



4 April 2025

NZ Automobile Association submission on:  
**Vehicle Standards Compliance  
Amendment 2025 Consultation**



**SUBMISSION TO:** New Zealand Transport Agency / Waka Kotahi  
**REGARDING:** Vehicle Standards Compliance Amendment 2025  
**DATE:** 4 April 2025

**EMAIL:** [rules@nzta.govt.nz](mailto:rules@nzta.govt.nz)

**SUBMISSION AUTHORISED BY:** Simon Douglas  
Chief Policy & Advocacy Officer  
New Zealand Automobile Association Incorporated (NZAA)  
PO Box 1, Wellington, 6140

**SUBMISSION AUTHOR:** Terry Collins

**AUTHOR E-MAIL:** [TJCollins@aa.co.nz](mailto:TJCollins@aa.co.nz)

**AUTHOR PHONE:** (04) 931 9986

**COPYRIGHT & PERMISSION TO REPRODUCE:**

The content of this submission is the property of the NZAA. Information in it is relevant at the time of authorship. The NZAA gives permission for content in it to be freely copied, cited and distributed, but not altered, subject to due care that content used does not misrepresent the NZAA.



## Executive summary

The New Zealand Automobile Association (AA) welcomes the opportunity to provide comment on the Vehicle Standards Compliance Amendment 2025.

The AA fully supports the proposal to extend the period for Warrant of Fitness (WoF) tests for vintage and veteran vehicles from 6 months to 12 months. We believe this will not compromise road safety while saving the owners of these vehicles unnecessary expense.

We support the extension of the period for Certificate of Fitness (CoF) tests for privately owned motorhomes, with some reservations. We are concerned about motorhomes that are parked for sustained periods in harsh environments that could cause corrosion to the brakes or critical safety structures. We recommend that an evaluation of CoF test failures be made after three years to determine if the failure rates have increased because of increasing the CoF period to 12 months.

We also recommend that the Ministry of Transport and NZTA begin exploration of moving the WoF and CoF regimes to one that is based on distant travelled. We believe that distance travelled by a vehicle is a better indicator of wear and tear than the age of a vehicle. A distance-based system would also align with the proposed changes to the Road User Charges regime that is targeted to commence in 2027.

## Comment

The answers below are to the questions asked in the consultation document.

### 1. Do you support reducing WoF check frequency for light vintage vehicles over 40 years old?

The AA fully supports the proposal to extend the period for Warrant of Fitness (WoF) tests for vintage and veteran vehicles from 6 months to 12 months. We believe this will not compromise road safety while saving the owners of these vehicles unnecessary expense. Vintage and veteran vehicles are usually only used as secondary transport and as such travel less distance than an owner's primary mode of transport. They are often prized possessions for their owners who maintain them and care for them usually better than their more modern primary transport option. Due to travelling less distance and the care and maintenance they receive it is appropriate that they only be inspected annually.

### 2. Would this proposed change have any positive or negative impacts for example, on people or businesses?

The change to an annual WoF inspection would halve the current biannual inspection costs for the owners of the affected vehicles. Collectors and enthusiasts usually own multiple vehicles so the inspection cost savings will be meaningful and welcome. Those costs are not just monetary they also include the time required to drive the vehicles to and from the inspection locations, and for commercial vehicle museums these cost savings could be substantial.

### **3. Do you support reducing CoF check frequency for privately owned heavy motorhomes?**

We support the extension of the period for Certificate of Fitness (CoF) tests for privately owned motorhomes, with some reservations, as outlined below.

### **4. Would this proposed change have any positive or negative impacts for example, on people or businesses?**

We are concerned about motorhomes that are parked for sustained periods in harsh environments that could cause corrosion to the brakes or critical structural elements of a motorhome. There are both pros and cons of a motorhome travelling on an occasional basis. Less distance travelled means less wear and tear on the vehicle so that results in less need for maintenance. However, if a motorhome is parked for an extended period in a corrosive environment like a beach, then the risk of brakes jamming or rust to the vehicle is higher. Private motorhome data related to CoF inspection pass rates per inspection year shows that the 'at first inspection' pass percentage steadily declines as motorhomes age. Once a motorhome is 40 or more years old, less than half pass their initial inspection. We acknowledge that this is variable at different age points but believe this is due to the decreasing number of old motorhomes as older ones leave the fleet.

Although this is hard to quantify, we recommend that an evaluation of CoF test failures be made after three years of the new regime being in place to determine if the failure rates have increased because of increasing the CoF period to 12 months.

### **5. Are there any implementation or compliance issues that need to be considered?**

The following suggestion does not relate to implementation or compliance issues related to this specific proposal, but instead is a comment on potential further changes to the whole WoF/CoF regime, which the AA believes merits consideration.

The Government has announced that it intends to transition all light vehicles currently paying Fuel Excise Duty to instead paying their road tax via the Road User Charges system as a way of ensuring enough money continues to be collected in an equitable way for future road building, other transport network upgrades and maintenance costs. One innovation that the AA believes would work in harmony with this change would be to also move the WoF and CoF regimes for all vehicles to be based on the distance they travel.

The consultation document states that:

*“Accounting for the difference in vehicle numbers, when compared to light vehicles under 40 years old, light vehicles over 40 years old:*

- *travel around half as many kilometres a year; and*
- *are half as likely to be involved in a crash involving a death or serious injury, where a vehicle fault contributed.”*

This supports the concept that distance travelled by a vehicle is a better indicator of risk. Distance travelled is also a very good indicator of wear and tear rather than the age of a vehicle. A distance-based system could be leveraged off the proposed changes to the Road User Charges regime that is currently proposed to commence in 2027. The mechanism recording the distance travelled for RUC could also be used to determine when a WoF or CoF was required. This would be much like the service periods used by vehicle manufacturers and possibly aligned. This could mean that servicing and WoF are done at the same time thereby saving time and expense.

Further innovations could also be found in moving the ACC Motoring Account to collect the ACC Levy by distance as well, as again distance travelled is a better proxy of risk of harm.

## About the New Zealand Automobile Association

The NZAA is an Incorporated Society with over 1.1 million individual Members, representing a large proportion of New Zealand's road users. The AA was founded in 1903 as an automobile users' advocacy group, but today our work reflects the wide range of interests of our large membership, many of whom are cyclists and public transport users as well as private motorists.

Across New Zealand, the motoring public regularly come into contact with the AA through our breakdown officers, 36 AA Centres and other AA businesses. Meanwhile, 18 volunteer AA District Councils around New Zealand meet each month to discuss local transport issues. Based in Wellington and Auckland, our professional policy and research team regularly survey our Members on transport issues, and Members frequently contact us unsolicited to share their views. Via the AA Research Foundation, we commission original research into current issues in transport and mobility. Collectively, these networks, combined with our professional resource, help to guide our advocacy work and enable the NZAA to develop a comprehensive view on mobility issues.

Motorists pay around \$5 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. This money is reinvested by the Government in our transport system, funding road building and maintenance, public transport services, road safety work including advertising, and Police enforcement activity. On behalf of AA Members, we advocate for sound and transparent use of this money in ways that improve transport networks, enhance safety and keep costs fair and reasonable.

Our advocacy takes the form of meetings with local and central government politicians and officials, publication of research and policy papers, contributing to media on topical issues, and submissions to select committees and local government hearings.

### **Total Membership**

1.8+ million Members

Over 1.1 million are personal Members

Over 0.7 million are business-based Memberships



**% of licenced drivers**

At least 29% of licensed drivers are AA Members

---

**Gender split**

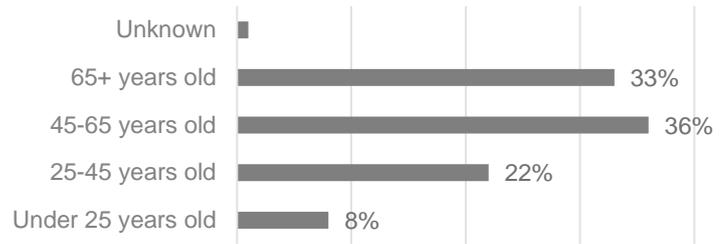
54% Female

46% Male

---

**Age range & Membership retention**

**Age of AA Members**



52% of AA Members have been with us for over 10 years.

---