



2 April 2026

OC260127

Hon James Meager

Action required by:

Associate Minister of Transport

Thursday, 9 April 2026

FINAL LAND TRANSPORT RULE: VEHICLE STANDARDS COMPLIANCE AMENDMENT 2026 - WARRANT OF FITNESS AND CERTIFICATE OF FITNESS A REQUIREMENTS

Purpose

This paper provides you with a draft Cabinet paper and final Land Transport Rule: Vehicle Standards Compliance Amendment 2026 (VSC Amendment Rule) for Ministerial and departmental consultation. It also provides you with advice on matters required under section 164(2) of the Land Transport Act 1998 to enable this Rule amendment.

Key points

- On 1 April 2026, Cabinet Economic Policy Committee agreed to a suite of changes related to the Land Transport Rules Reform Programme (ECO-26-MIN-0047 refers). This included changing Warrant of Fitness (WoF) and Certificate of Fitness A (CoF A) inspection requirements for light private vehicles and light rental vehicles, and complementary initiatives to mitigate safety risk.
- Land Transport Rule: Vehicle Standards Compliance 2002 (the VSC rule) sets out requirements to control the entry of vehicles into, and operation of vehicles in, the land transport system. The VSC Amendment Rule will amend the VSC Rule to reflect Cabinet's decisions related to light vehicle WoF and CoF A inspection frequency and scope.
- Before recommending the Governor-General sign the VSC Amendment Rule, you are required to have regard (and give such weight, as you consider appropriate in each case) to the various matters outlined in section 164(2) of the Land Transport Act 1998. This briefing includes our advice on these matters.
- The VSC Amendment Rule is scheduled to be signed on 28 April 2026 (subject to Cabinet confirmation of ECO agreement), after which you plan to publicly announce the changes. We will provide your office with communications material to support this announcement on 20 April 2026. The changes will come into effect on 1 November 2026.

Recommendations

We recommend you:

- 1 **note** that on 1 April 2026 the Cabinet Economic Policy Committee agreed to change Warrant of Fitness and Certificate of Fitness A requirements for light vehicles, including changes to inspection frequency and scope [ECO-26-MIN-0047].
- 2 **confirm** you have regard to, and give such weight as you consider appropriate in each case, Yes / No the matters set out in section 164(2) of the Land Transport Act 1998, as you are required to do so by section 152A(2) of the Act before making a recommendation to the Governor-General.
- 3 **note** Land Transport Rule: Vehicle Standards Compliance Amendment 2026 is compliant with the principles of the Treaty of Waitangi, the New Zealand Bill of Rights Act 1990, the Human Rights Act 1993, the principles and guidelines of the Privacy Act 2020, and the Legislation Guidelines.
- 4 **agree** to start departmental and Ministerial consultation on the draft Cabinet paper. Yes / No
- 5 **agree** to proactively release this briefing alongside the final Cabinet paper, following Cabinet’s consideration. Yes / No
- 6 **refer** this briefing to the Minister of Transport. Yes / No

s9(2)(a)


Katrina Quickenden
 Acting Deputy Chief Executive, Sector Strategy
 2 / 4 / 2026

Hon James Meager
 Associate Minister of Transport
 / /

- Minister’s office to complete:
- Approved
 - Declined
 - Seen by Minister
 - Not seen by Minister
 - Overtaken by events

Comments

Contacts

Name	Telephone	First contact
Laura Bender, Acting Manager, Regulatory Reform	s9(2)(a)	
Keegan Taylor, Principal Adviser, Regulatory Reform		✓

FINAL LAND TRANSPORT RULE: VEHICLE STANDARDS COMPLIANCE AMENDMENT - WARRANT OF FITNESS AND CERTIFICATE OF FITNESS A REQUIREMENTS

Cabinet has agreed to your proposed inspection changes for light vehicles

- 1 On 1 April 2026, the Cabinet Economic Policy Committee agreed to a suite of changes related to the Land Transport Rules Reform Programme (ECO-26-MIN-0047 refers).
- 2 This included extending Warrant of Fitness (WoF) and Certificate of Fitness A (CoF A) inspection intervals for light private vehicles and light rental vehicles, and expanding inspection scope to include modern safety features. Specifically, the Cabinet Committee agreed to:

	WoF	CoF A
Inspection Interval	Extend the period before a new light vehicle is required to undergo its second WoF inspection from three to four years. Introduce a two-yearly inspection interval for light vehicles less than fourteen years old (excluding motorcycles), and a yearly WoF inspection interval for motorcycles and light vehicles fourteen years or older.	Introduce 12-month default CoF A inspection frequency for all light rental service vehicles.
Inspection Scope	Maintain current WoF and CoF A inspection approach, with expanded testing of certain Advanced Driver Assistance Systems (ADAS) features.	

- 3 Cabinet's decisions related to increases in financial penalties for non-compliance are being progressed alongside other changes to infringements in the Rules Reform Programme, and will be implemented before 1 November 2026. The proposal to support increased local enforcement is subject to further advice to Ministers.
- 4 Land Transport Rule: Vehicle Standards Compliance 2002 (the VSC rule) sets out requirements to control the entry of vehicles into, and operation of vehicles in, the land transport system. Land Transport Rule: Vehicle Standards Compliance Amendment 2026 (VSC Amendment Rule) has been drafted to reflect Cabinet's decisions related to inspection frequency and scope.¹
- 5 There are several legislative requirements that you must fulfil before the VSC Amendment Rule can be signed.

You must consider matters under section 164(2) of the Land Transport Act 1998

- 6 Section 152A of the Land Transport Act 1998 (the Act) empowers the Governor-General, by Order in Council, on the recommendation of you (as the Associate Minister of Transport), to make, amend, or revoke an ordinary Land Transport Rule.

¹ The VSC Amendment Rule retains the carve-out for agricultural motor vehicles (e.g. trailer or tractor) that is already provided for in the VSC rule.

- 7 Before making a recommendation to the Governor General, section 152A(2) of the Act requires you to have regard (and give such weight, as you consider appropriate in each case) to the various matters outlined in section 164(2) of the Act.
- 8 We provided you with the final Regulatory Impact Analysis (RIA) as part of the recent Cabinet package (OC260146 refers). The following table summarises the key impacts discussed in the RIA and provides advice on other matters not covered by the RIA.

Matter to be considered	Comment
<p>Section 164(2)(a) The level of risk existing to land transport safety in each proposed activity or service</p>	<ul style="list-style-type: none"> • Vehicle condition is a factor in roadworthiness - a vehicle's ability to operate safely, ensuring it does not pose a danger to passengers or other road users. • Vehicles that are not well maintained are more likely to have defects and be involved in crashes that lead to injuries and deaths. • The main vehicle defect risks managed through WoF/CoF A are safety-critical components (e.g. tyres, brakes, steering, lighting) and electronic safety systems where fitted (e.g. warning indications, airbag system warning lights). • Vehicle-related defects were recorded in 3.7% of fatal crashes in 2023, and WoF non-compliance at any given time is estimated at 13–16%. • Evidence used to identify and assess these risks includes crash and vehicle datasets (Crash Analysis System and Motor Vehicle Register) and international comparisons.²
<p>Section 164(2)(b) The nature of the particular activity or service for which the rule is being established</p>	<ul style="list-style-type: none"> • VSC Amendment Rule regulates the periodic vehicle inspection services that support the land transport system by providing a minimum roadworthiness check for light vehicles (WoF) and light private rental service vehicles (CoF A). • VSC Amendment Rule specifies who must obtain an inspection, how often inspections must occur (frequency), and what must be checked at inspection (scope), including traditional mechanical items and specified modern safety features where fitted. • WoF requirements apply to most light vehicles in the fleet (including motorcycles and trailers), which are typically privately owned and have diverse use and maintenance patterns. • CoF A applies to light passenger vehicles used in passenger services (e.g., taxis and rideshare) and to rental service vehicles. CoF A is a more stringent inspection than WoF and is carried out at independent testing stations. • Key participants affected include vehicle owners and drivers (including owners of newly imported vehicles), rental operators, approved inspection organisations and individual inspectors, NZ Transport Agency (NZTA), and enforcement agencies (e.g., NZ Police).
<p>Section 164(2)(c) The level of risk existing to land transport safety in New Zealand in general</p>	<ul style="list-style-type: none"> • New Zealand's land transport system continues to experience material safety risk, reflected in ongoing deaths and serious injuries, although overall safety outcomes have improved over time.

² Jurisdictions compared included Japan, the United Kingdom, the Republic of Ireland, and Sweden.

	<ul style="list-style-type: none"> • Long run trends show improvement from the early 1990s, but deaths remain in the hundreds each year, and OECD comparisons show New Zealand remains a relatively high-risk country compared with leading jurisdictions. • Between 2015 and 2024, there were over 23,000 crashes resulting in death or serious injury. Of these, vehicle-related defects were identified in approximately 820 crashes (3.5 percent of death and serious injury crashes), far less than other factors like speed or alcohol and/or drugs at 23 percent and 34 percent respectively. • Motorcycles are over-represented in crash data. This may reflect a range of factors, including rider behaviour, the limited physical protection offered by motorcycles, and vehicle condition. • An ageing light-vehicle fleet (average around 15 years) increases the system-wide importance of ensuring older vehicles remain roadworthy. • The proposed changes are intended to better align inspection requirements to risk while ensuring inspection scope remains fit-for-purpose for an evolving fleet. This includes retaining checks on core safety-critical components and updating scope to include specified modern safety features/ADAS where fitted.
<p>Section 164(2)(d) The need to maintain and improve land transport safety and security, including (but not limited to) personal security</p>	<ul style="list-style-type: none"> • The VSC Amendment Rule slightly increases risk for lower-risk vehicles by extending inspection intervals, while preserving a safety net and delivering compliance cost savings. • Extending inspection intervals increases the likelihood that safety-critical defects develop and remain undetected for longer between inspection (estimated at 0.6% to 1.3% increase in defect-related crash risks over 30 years), with estimated additional crash costs of \$351m–\$776m across the system. • The risk increase is modest relative to the large net economic benefits (\$2.6b–\$4.1b over 30 years) from fewer inspections, reduced compliance time, and avoided unnecessary repairs. • The risk is higher for older vehicles and motorcycles, so the system is two-tiered: annual WoFs are retained for vehicles 14+ years and all motorcycles, while lower-risk vehicles move to longer intervals. • While risk increases between 10 and 14 years of vehicle age, modelling indicates the 14-year threshold delivers a positive net benefit overall. Data on vehicle safety risk shows an increase in crashes where vehicle factors were recorded for vehicles over 15 years of age. • Modelling for motorcycles is not definitive, but suggests the negative safety effects of longer inspection intervals may outweigh compliance savings. • There was only one rental vehicle crash with defect factor in ten years of crash data, demonstrating limited evidence of safety risk. The change to annual CoF A inspections reflects this. • The changes improve the effectiveness of the safety net by updating WoF and CoF A inspection scope to include checks of modern safety features/ADAS where fitted, however, we cannot quantify how big this impact will be.

	<ul style="list-style-type: none"> Results are based on conservative modelling assumptions, providing confidence that potential effects on safety have not been understated.
<p>Section 164(2)(da) The appropriate management of infrastructure, including (but not limited to) (i) the impact of vehicles on infrastructure; and (ii) whether the costs of the use of the infrastructure are greater than the economic value generated by its use</p>	<ul style="list-style-type: none"> The VSC Amendment Rule is not expected materially affect infrastructure.
<p>Section 164(2)(e)(i) Whether the proposed rule assists economic development</p>	<ul style="list-style-type: none"> The primary economic effect of the changes is reduced compliance cost and time for vehicle owners and businesses because fewer WoF/CoF A inspection events are required for lower-risk cohorts. Analysis identifies net benefits of approximately \$2.6 to \$4.1b (over 30 years). This reflects the balance of reduced inspection costs against a small forecast increase in defect-related crash costs from longer inspection intervals. The inspection cost savings are driven by fewer inspection fees paid by vehicle owners (\$1,867m to \$2,718m), reduced compliance time (e.g. booking, travelling, waiting for and completing inspections, \$623m to \$954m) and avoided unnecessary or premature repair costs (\$343 to \$1,319m). The changes are expected to reduce light vehicle inspection volumes over time, resulting in up to \$98 million less revenue per year for the inspection industry and an estimated 703 fewer full-time inspection staff. The phased rollout, continued annual inspections for higher-risk cohorts (older vehicles, motorcycles, and rental fleets), and expanded inspection scope are expected to partially offset impacts and support sector transition. The changes are intended to preserve a credible safety net so that economic benefits are not achieved at the expense of a disproportionate effect on safety.
<p>Section 164(2)(e)(ii) Whether the proposed rule improves access and mobility</p>	<ul style="list-style-type: none"> The VSC Amendment Rule is not expected to materially affect access and mobility.
<p>Section 164(2)(e)(iii) Whether the proposed rule protects and promotes public health</p>	<ul style="list-style-type: none"> The VSC Amendment Rule is not expected to materially affect public health beyond what is described above (in section 164(2)(d)).
<p>Section 164(2)(e)(iv) Whether the proposed rule ensures environmental sustainability</p>	<ul style="list-style-type: none"> The VSC Amendment Rule is not expected to materially affect environmental sustainability.

<p>Section 164(2)(ea) The costs of implementing measures for which the rule is being proposed</p>	<ul style="list-style-type: none"> • Implementation costs for agencies (primarily NZTA) are expected to be \$2.01m, comprising: \$0.93m for project management, business analysis and change management; \$0.79m for digital development; \$0.07m for information and education; and \$0.22m for contingency and other costs (e.g., WoF/CoF A book replacement). • Inspectors will need to update procedures, guidance and training (including for checks of modern safety features where fitted) and may need to make minor process or equipment changes to support consistent application. • NZTA will coordinate implementation with key stakeholders including enforcement entities and the inspection industry. NZTA will also work with enforcement partners (including NZ Police and local councils) to support implementation and enable effective compliance and monitoring. • Other options for changes to light vehicle inspection requirements were considered, (e.g. retaining the status quo; applying longer inspection frequency intervals to a narrower cohort; changing inspection frequency without expanding inspection scope). The recommended option was identified as having the lowest transition and ongoing costs.
<p>Section 164(2)(eb) New Zealand’s international obligations concerning land transport safety</p>	<ul style="list-style-type: none"> • We have not identified any binding international obligations that affect the settings proposed in this VSC Amendment Rule.
<p>Section 164(2)(f) The international circumstances in respect of land transport safety</p>	<ul style="list-style-type: none"> • Internationally, OECD-comparable jurisdictions inspection regimes typically use yearly or two-yearly in-service inspections for light vehicles, often with age-tiering. New Zealand’s current WoF requirements (6–12 monthly inspections depending on vehicle age) are more frequent than many OECD comparators, placing New Zealand out of step with common international practice. • Other countries typically require annual inspections once vehicles reach a set age³ or biennial inspections for some cohorts before moving to annual as vehicles age⁴. Australia varies by state, with some states relying on event-based inspections and others requiring annual inspections for older vehicles. • A common international issue is ensuring inspection regimes remain effective as the fleet changes (e.g. more vehicles with electronic safety systems). The scope change to include checks of modern safety features where fitted reflects that shift.
<p>Section 164(2)(g) Such other matters as you consider appropriate in the circumstances</p>	<ul style="list-style-type: none"> • We have not identified any other matters for you to consider.

There are other matters you must consider before recommending a rule change

9 We consider the VSC Amendment Rule is compliant with each of the following:

³ The United Kingdom requires annual inspections after a vehicles first three years.

⁴ For example, the Republic of Ireland requires a first test after four years, then biennial until 10 years, then annual.

- 9.1 the principles of the Treaty of Waitangi,
- 9.2 the rights and freedoms contained in the New Zealand Bill of Rights Act 1990 and the Human Rights Act 1993,
- 9.3 the principles and guidelines set out in the Privacy Act 2020,
- 9.4 relevant international standards and obligations, and
- 9.5 the Legislation Guidelines (2021 edition), which are maintained by the Legislation Design and Advisory Committee.

Timing and the 28-day rule

- 10 The VSC Amendment Rule will be notified in the Gazette in accordance with the Legislation Act 2019 and will be available on the NZTA website.⁵ It is intended to come into force on 1 November 2026. To minimise significant swings in inspection demand between years, implementation of two-yearly WoFs- will be phased: vehicles first registered after 1 November 2019 will be eligible from November 2026, with vehicles first registered after 1 November 2013 eligible from November 2027.
- 11 NZTA is engaging closely with industry and enforcement partners to support implementation requirements. Officials intend to monitor and report on the changes and will undertake an evaluation five years after the changes have been implemented.
- 12 In 2008, Cabinet agreed that Land Transport Rules should comply with the 28-day rule [CBC Min (08) 17/10 refers], a convention that legislative instruments do not come into force until at least 28 days after notification in the Gazette. As the VSC Amendment Rule is expected to come into force on 1 November 2026, no specific 28-day rule issues arise. Subject to Cabinet’s consideration, the updated VSC Amendment Rule will be made as an Order in Council by the Governor-General at the Executive Council following Cabinet on 28 April.

Next steps

- 13 Subject to your feedback and agreement, we will progress the attached Cabinet paper based on the following timeframes:

Stage	Indicative dates
Departmental consultation	7 April 2026 to 14 April 2026
Ministerial consultation	7 April 2026 to 14 April 2026
Cabinet paper lodged	16 April 2026
Legislation Cabinet Committee	22 April 2026

⁵ Can be found here: <https://www.nzta.govt.nz/resources/rules/vehicle-standards-compliance-2002-index>

Cabinet, Executive Council and public announcement	28 April 2026
Gazetting	30 April 2026
Signed VSC Amendment Rule	Returned by 4 May 2026

- 14 You have signalled the intention to announce the VSC Amendment Rule following Cabinet and after it has been signed by the Governor-General.
- 15 The Ministry of Transport and NZTA will provide communications material to support a public announcement to your office by 20 April 2026. This includes a Ministerial press release, reactive Q&A, and proposed emails to key stakeholders.

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

**ANNEX 1 DRAFT CABINET PAPER LAND TRANSPORT RULE:
VEHICLE STANDARDS COMPLIANCE AMENDMENT 2026
(WARRANT OF FITNESS AND CERTIFICATE OF FITNESS A
REQUIREMENTS)**

ANNEX 2 ADVICE SHEET FOR EXECUTIVE COUNCIL SUBMISSION

**ANNEX 3 DRAFT LAND TRANSPORT RULE: VEHICLE STANDARDS
COMPLIANCE AMENDMENT 2026**

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT