

Proactive Release

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Some information has been withheld on the basis that it would not, if requested under the Official Information Act 1982 (OIA), be released. Where that is the case, the relevant section of the OIA has been noted and no public interest has been identified that would outweigh the reasons for withholding it. *Note - N/A (see below)

Listed below are the most commonly used grounds from the OIA.

N/A - Document released in full. No information has been withheld for this proactive release

<u>Section</u>	<u>Description of ground</u>
6(a)	as release would be likely to prejudice the security or defence of New Zealand or the international relations of the New Zealand Government
6(b)	as release would be likely to prejudice the entrusting of information to the Government of New Zealand on a basis of confidence by (i) the Government of any other country or any agency of such a Government; or (ii) any international organisation
6(c)	prejudice the maintenance of the law, including the prevention, investigation, and detection of offences, and the right to a fair trial
9(2)(a)	to protect the privacy of natural persons
9(2)(b)(ii)	to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information
9(2)(ba)(i)	to protect information which is subject to an obligation of confidence or which any person has been or could be compelled to provide under the authority of any enactment, where the making available of the information would be likely to prejudice the supply of similar information, or information from the same source, and it is in the public
9(2)(ba)(ii)	to protect information which is subject to an obligation of confidence or which any person has been or could be compelled to provide under the authority of any enactment, where the making available of the information would be likely otherwise to damage the public interest
9(2)(f)(ii)	to maintain the constitutional conventions for the time being which protect collective and individual ministerial responsibility
9(2)(f)(iv)	to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials
9(2)(g)(i)	to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation or officers and employees of any public service agency or organisation in the course of their duty
9(2)(h)	to maintain legal professional privilege
9(2)(i)	to enable a Minister of the Crown or any public service agency or organisation holding the information to carry out, without prejudice or disadvantage, commercial activities
9(2)(j)	to enable a Minister of the Crown or any public service agency or organisation holding the information to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations)

Interim Regulatory Impact Statement: Simplifying the regulatory framework for heavy vehicles (phase one)

Decision sought	Approval to release a consultation document seeking views on phase one of proposals to simplify the regulatory framework for heavy vehicles
Agency responsible	Ministry of Transport and the New Zealand Transport Agency Waka Kotahi
Proposing Ministers	Minister of Transport
Date finalised	14 October 2025

Briefly describe the Minister's regulatory proposal

As part of the Land Transport Rules (Rules) Reform Programme announced by the Minister of Transport (the Minister) on 19 June 2025, the Minister wishes to consult in October 2025 on four initial proposals to simplify the regulatory framework for heavy vehicles:

- Removing the requirement for 50MAX trucks to operate under permits, instead, incorporating the requirements for 50MAX vehicles into the Land Transport Rule: Vehicle Dimensions and Mass 2016 (VDAM), and introducing a downloadable proforma for operators that includes the access restrictions for these vehicles.
- Removing the requirement for vehicles operating over 44 tonnes and overlength vehicles to display H plates by amending VDAM.
- Incorporating the Bolster Attachment Code (the Code) into the Land Transport Rule: Heavy Vehicles 2004 (the HV Rule) by reference, with updates being approved by the Director of Land Transport (the Director). The Code sets out the requirements for the safe attachment of log bolsters to heavy vehicles being used as logging trucks.
- Removing an unused definition of "low volume vehicle" from the HV Rule.

This interim Regulatory Impact Statement (interim RIS) provides an initial analysis of two of these proposals to support the release of the consultation document. The proposal to incorporate the Code by reference has been exempted from impact analysis requirements by the Ministry for Regulation, on the basis it would have no or only minor economic, social, or environmental impacts. The proposal to remove an unused definition from the HV Rule has been exempted from impact analysis requirements on the basis that this proposal is for the removal of an already redundant legislative provision.

These proposals form 'phase one' of work to simplify the regulatory framework for heavy vehicles. Phase two is intended for consultation in early 2026. Related documentation for phase two, including any RIS requirements, will be produced closer to this time.

Summary: Problem definition and options

What is the policy problem?

Road freight is a critical enabler of economic activity in New Zealand, with heavy vehicles transporting around 93 percent of freight volumes. Many sectors require road freight to support essential business activity, including the retail and wholesale, agriculture, forestry, dairy, manufacturing, and construction industries.

However, heavy vehicles are arguably subject to rules and regulations that have not kept pace with a changing transport system. Some of the current requirements may not always target regulatory effort to risk and can become obstacles to technological and safety advancements, change, and efficiency.

On 19 June 2025, the Minister announced a new programme of work to remove outdated and unfit for purpose regulatory requirements to increase productivity and efficiency. The work includes a commitment to consult on proposals to simplify the regulatory framework for heavy vehicles.

During informal consultation with subject matter experts, industry bodies, road controlling authorities (RCAs) and enforcement officers, the Ministry of Transport (the Ministry) and the New Zealand Transport Agency Waka Kotahi (NZTA) have identified several regulatory requirements that appear to impose compliance costs. In particular:

- 50MAX trucks require special 50MAX permits to operate on routes that have been approved for 50MAX vehicles. 50MAX vehicles are a type of High Productivity Motor Vehicle (HPMV) that can carry 6 more tonnes of freight than standard 44-tonne trucks by having an extra axle (totalling 9) to better distribute the additional load weight.
- Vehicles operating over 44 tonnes and/or overlength are required to display H plates. These plates were originally introduced when HPMVs were uncommon, to indicate the vehicle is operating under special permit conditions.

Without regulatory changes, these issues are expected to continue to impose compliance and administrative costs on the sector and government agencies.

What is the policy objective?

The intended outcomes of the changes are to:

- Reduce regulatory compliance costs
- Manage safety risks
- Manage wear on the road network
- Take a risk-based approach to enforcement, and
- Enable productivity improvements in the heavy vehicle sector.

The success of the changes will be determined by their effects on:

- Compliance costs
- Road safety outcomes
- Road network condition
- RCA and New Zealand Police (Police) ability to enforce heavy vehicle requirements, and
- Removal of barriers to productivity in the heavy vehicle sector.

What policy options have been considered, including any alternatives to regulation?

NZTA has considered temporary operational solutions to the 50MAX permitting and H plate issues. However, as the policy problems identified arise from current legislative settings,

legislative change is a more appropriate solution. Operational changes cannot fully eliminate current compliance costs and may create more burden for industry and government.

The 'status quo' option would retain regulatory requirements that may be unfit for purpose, ineffective, and burdensome for industry and government, including NZTA, Police, and local RCAs.

What consultation has been undertaken?

This interim RIS supports the release of a consultation document seeking views from the public and industry organisations on the proposals.

The Ministry and NZTA have consulted with each other, Ministers, and representatives of the heavy vehicle sector on options to reform the heavy vehicle regulatory framework over several years. These discussions and subsequent Ministerial decisions informed the initial identification, longlisting, and prioritisation of potential interventions.

During September 2025, the Ministry and NZTA undertook further targeted consultation with the heavy vehicle sector and other government agencies about the proposals in this interim RIS. These discussions involved a range of internal NZTA subject matter experts, key bodies representing the heavy vehicle sector, Police, and RCAs. The heavy vehicle sector and Police were broadly supportive of the proposals. Feedback from RCAs was mixed, with some RCAs concerned about maintaining compliance with restrictions, while others felt any risks could be managed through current or new processes.

Through consultation, we expect to receive further feedback from RCAs, the heavy vehicle sector and any other stakeholders.

Is the preferred option in the Cabinet paper the same as preferred option in the RIS?

This interim RIS does not accompany a Cabinet paper, as the Minister has been delegated authority from Cabinet to approve the release of the consultation document that this interim RIS relates to. The proposals set out in this interim RIS and consultation document align with the high-level proposals approved by Cabinet on 4 June 2024 [ECO-MIN-0083 refers]. This section will be updated in the final RIS.

Summary: Minister's preferred option

Costs (Core information)

The proposals aim to reduce regulatory burden and are therefore expected to have low costs. NZTA may face small up-front costs to develop proformas for 50MAX vehicles to include vehicle requirements and access restrictions. There will be a very small loss of revenue for retailers that sell H plates. These proposals are not expected to directly affect the condition of the state highways or the local road network managed by RCAs.

Benefits (Core information)

The proposal to remove 50MAX permits will mostly benefit heavy vehicle operators by reducing the time spent applying for and renewing these permits. 50MAX operators with multiple vehicle types will also have more flexibility to mix vehicle loads. This proposal will also benefit NZTA by reducing administration time for a low-risk process, as 95 percent of which are approved.

The proposal to remove the H plate requirement will mostly benefit operators by eliminating the monetary costs and staff time spent purchasing, attaching, and maintaining these plates. It may also have a small benefit to Police, by reducing the amount of time spent enforcing and administering offences (the incorrect or non-display of H plates) with a high rate of successful appeals.

Balance of benefits and costs (Core information)

Does the RIS indicate that the benefits of the Minister's preferred option are likely to outweigh the costs?

The current view of Ministry and NZTA officials is that the benefits of removing these regulatory requirements are likely to outweigh the costs. Any operational changes from NZTA or Police to adjust to the new proforma system are expected to be an improvement from the status quo.

Implementation

How will the proposal be implemented, who will implement it, and what are the risks?

Subject to Ministerial approval, the Ministry anticipates that final Rule amendments will be signed by the Minister in May 2026.

NZTA will be responsible for the implementation and ongoing operation of the changes for the roads it controls, and the RCAs it provides permitting services for. RCAs who provide their own permitting services (i.e. who don't outsource this function to NZTA) will be responsible for some implementation changes and the ongoing operation of the changes for the roads they control.

NZTA will develop a communications plan and consult with all RCAs, industry, and Police to ensure an understanding of and compliance with the new requirements. Implementation costs are still being confirmed but will be determined prior to confirmation of final Rule amendments.

Officials do not expect any changes in compliance from making the changes.

Limitations and Constraints on Interim Analysis

Options were limited by previous Cabinet and Ministerial policy decisions. As such, the options considered are the status quo and a regulatory change option.

Interim options analysis is based on administrative data held by NZTA, existing Australian research, and consultation with the heavy vehicle industry, RCAs, Police, and NZTA subject matter experts.

Time constraints limited the opportunity for specific research.

NZTA estimates of implementation timeframes and cost will depend on final policy decisions, and we will be seeking indications from other RCAs about potential impacts during public consultation.

I have read the interim Regulatory Impact Statement and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the preferred option.



Responsible Manager(s) signature: _____

Katrina Quickenden

Manager, Regulatory Reform

14 / 10 / 2025

Quality Assurance Statement

Reviewing Agency: Ministry of Transport

QA rating: Meets

Panel Comment: This Interim Regulatory Impact Statement is complete, convincing, clear, and shows evidence of appropriate consultation. It meets the QA panel's expectations.

Section 1: Diagnosing the policy problem

What is the context behind the policy problem and how is the status quo expected to develop?

Road freight plays a vital role in New Zealand's economic productivity. However, heavy vehicles are subject to rules and regulations that arguably have not kept pace with modern regulation. These regulatory requirements may limit economic efficiency and productivity in the transport sector and to the wider economy.

Over the last year, Ministry and NZTA officials have consulted with heavy vehicle sector representatives, the Police and RCAs to identify potentially burdensome and unfit for purpose regulatory requirements. Officials assessed these requirements and provided advice to Ministers on options to reduce regulatory burden and enable a more productive heavy vehicle sector.

What is the policy problem or opportunity?

On 19 June 2025, the Minister announced a new programme of work to reform the Land Transport Rules (the Rules Reform programme), intended to remove outdated and unfit for purpose regulatory requirements, with the aim of increasing productivity and efficiency. The programme includes a commitment to consult on proposals to simplify the regulatory framework for heavy vehicles.

Without regulatory changes, these requirements will continue to impose unnecessary compliance costs on the sector and administrative burden on government agencies. There is an opportunity to reduce requirements and improve the system for all parties. The proposals in this interim RIS comprise phase one of the Government's work to simplify the regulatory framework for heavy vehicles.

50MAX permits

Since 2013, 50MAX vehicles have been an option for approved heavy vehicles to carry increased payloads on parts of the network that are economically important to New Zealand but cannot support the higher volume of freight on a conventional vehicle combination.

50MAX vehicles exceed the combination mass limits for general access to the network. However, they have one more axle than a conventional 8 axle 44 tonne combination. This extra axle means the overall truck load is spread further with either less or no additional wear on the road per tonne of freight than a conventional combination.

50MAX vehicles have better safety outcomes

50MAX vehicles operate under New Zealand's Performance Based Standards (PBS) framework, allowing them to exceed the standard 44-tonne weight limit by meeting specific performance and safety criteria. A 2025 Australian operation found that vehicles meeting the PBS framework were involved in 46 percent fewer major crashes per kilometre travelled than conventional heavy vehicles.¹ Another Australian study found that, from 2015 to 2019, PBS vehicles were involved in 60 percent fewer major crashes per 100 million kilometres travelled and 30 percent fewer major

¹ National Heavy Vehicle Regulator. 2021. Report reveals PBS vehicles involved in fewer major crashes. Available at: <https://www.nhvr.gov.au/news/2021/05/28/report-reveals-pbs-vehicles-involved-in-fewer-major-crashes>

crashes per 10,000 vehicles than conventional heavy vehicles.² As 50MAX vehicles can carry more freight per trip, they may also decrease crash risk by reducing the number of heavy vehicle trips.

Although 50MAX vehicles outperform standard heavy vehicles, they are subject to more requirements

Despite the equal or better outcomes for safety and road wear, the VDAM Rule requires 50MAX operators to obtain a permit for their vehicles to operate on the network. These permits restrict 50MAX vehicle access to parts of the roading network where the infrastructure can support these vehicles.

Operators are required to apply for and obtain a 50MAX permit renewal every two years, and before their current permit expires. 50MAX vehicles also often require overlength permits and must display an H plate.

There is an opportunity to remove the permit requirement for 50MAX vehicles and adopt more efficient regulatory practice

The heavy vehicle sector believes there is no longer a need for 50MAX permits, and that the requirement to obtain and renew a permit creates a significant administrative and cost burden to the sector and government agencies. From August 2022 to July 2024, NZTA processed 13,503 permit applications from 1,486 operators. NZTA also considers that 50MAX permits could be removed but notes that the current risk of losing a permit may incentivise compliance with access restrictions.

Given not all parts of New Zealand's roading network can support 50MAX vehicles, officials are proposing to amend the VDAM Rule to enable the Director to publish a list of standard proformas. These would specify vehicle design requirements and necessary safety features for these vehicles (e.g. lighting and markings for visibility and electronic braking) for these vehicles, as well as approved network maps, indicating where 50MAX vehicles can and cannot go. Under these proposals, 50MAX operators must still comply with all relevant vehicle and route restrictions.

Officials consider that this option reduces administrative burden, protects the road network, and provides flexibility and responsiveness by giving the Director discretion to enable regulatory responses without a Rule change each time.

As 50MAX vehicles would not be a permit vehicle under the Rule, RCAs could not require them to obtain permits other than the HPMV permit. However, RCAs can still determine access restrictions for these vehicles.

H plates

H plates were intended to help police officers identify larger and heavier trucks operating on permits



Under current Rules, H plates (pictured) must be affixed to any HPMV operating under a permit.³ H plates were intended to help police officers identify HPMVs operating under a permit, enabling Police to target HPMV permit enforcement to the right vehicles. When these display requirements were introduced in 2010, HPMVs were a relatively new and rare part of New Zealand's heavy vehicle fleet.

2. *Review of Major Crash Rates for Australian Higher Productivity Vehicles: 2015 – 2019*. The Chartered Institute of Logistics and Transport

³ HPMVs are heavy vehicles that exceed a mass of 44,000kg and/or the maximum length of 19m for semi-trailers, 20m for full trailers and b-trains, or 22m for truck and trailers.

The proportion of HPMVs in the New Zealand fleet has significantly increased since 2010. Between October 2022 to October 2024, NZTA had an estimated 43,530 successful HPMV permit applications that were subject to H plate requirements.⁴

The meaning of an H plate has become unclear

Considering the growth in HPMVs, it is unclear whether H plates still serve a purpose. Police have indicated these plates now have negligible value for their enforcement activities. RCAs have indicated that H plates provide them with some visibility of the vehicles on their network that may be operating under a permit. However, they also noted that H plates do not indicate whether the vehicle is carrying a load.

Officials also received feedback regarding confusion about the meaning of H plates, and where and when they must be displayed. HPMVs may have H plates displayed permanently on their vehicle, including during travel where the vehicle is not carrying a load and therefore not subject to a permit. In some cases, police officers and members of the public have assumed the presence of an H plate on an HPMV meant the vehicle was not allowed to be operating on that road. However, on further investigation, these HPMVs were often found to be compliant. From 2010 to mid-2025, 60 percent of H plate violations were waived or withdrawn and did not result in punitive action. While the reason behind their waiver or withdrawal is not available, these figures indicate significant confusion about H plate requirements.

In practice, it is difficult and inefficient for vehicle operators to remove and re-attach H plates every time their vehicles are loaded, unloaded, partially loaded, and/or combined with trailers. This is particularly burdensome for operators with larger, more diverse vehicle fleets, who may be swapping trailers frequently to carry out different tasks.

To address these issues, we propose amending the VDAM Rule to remove the requirement for HPMVs to display H plates.

Removing the requirements would also remove the associated offences, penalties and fees

Removing the H plate and 50MAX permit requirements would also remove the associated offences, penalties, and fees from any non-compliance. Officials consider that these changes are simple and administrative in nature and any effects of this would be limited or negligible.

We anticipate consequential amendments to fees, offences and penalties will be required as part of this proposal

Removing the permit requirement for 50MAX vehicles will mean that permit application fees will also be removed from the Land Transport (Regulatory Fees) Regulations 2023. Removing the H plate requirement will not require any changes to the Regulations as H plates are sold by independent retailers.

With the removal of 50MAX permits, offences and penalties in the Land Transport (Offences and Penalties) Regulations 1999 relating to permit breaches will no longer apply. Officials are determining whether requirements to present information to an enforcement officer on request will need to be introduced in the Rule.

What objectives are sought in relation to the policy problem?

⁴ As permits are issued with a term of 2 years, this is a good indicator for the number of HPMVs required to display H plates.

The proposals to remove permitting requirements respond to one of the Government's objectives for the Rules Reform programme, which is to reduce regulatory compliance costs and enable productivity in the heavy vehicle sector. These specific proposals also aim to transition to a more risk-based approach to enforcement, while preventing safety risks and wear on the road network.

What consultation has been undertaken?

In September 2025, the Ministry and NZTA undertook targeted consultation on the proposals in this interim RIS with:

- Police
- RCAs
- Accident Compensation Corporation
- Heavy vehicle sector representatives, including
 - National Road Carriers
 - Iā Ara Aotearoa Transporting New Zealand
 - Heavy Haulage Association
 - Crane Association of New Zealand
- ShopCare Charitable Trust, and
- American International Group (AIG) New Zealand.

Stakeholders were largely supportive of the proposals. RCA feedback was mixed:

- For 50MAX, some RCAs noted existing network infrastructure limitations, particularly with bridges, and the need for funding to better maintain these assets to accommodate 50MAX vehicles. Other RCAs did not view these limits as prohibitive, noting the relatively small number of declined applications for 50MAX permits, and the cost-efficiencies and stability that gravel roads offer these vehicles. Supportive RCAs also suggested mitigating network limitation breaches through regularly updated and communicated network limitation maps. Most RCAs called for stronger enforcement against heavy vehicles operating in breach of permits.
- For H plates, some RCAs noted that removal of this signage may reduce their visibility of the different types of heavy vehicles on their road network. RCAs supportive of the proposal expressed views about H plates being confusing and of limited value i.e. not indicative of whether a 50MAX vehicle is fully/partially laden etc.

Through consultation, we expect to receive further feedback from more organisations and individuals.

More broadly, the Ministry and NZTA have consulted with the heavy vehicles sector on options to reform the regulatory framework for heavy vehicles over several years. Those discussions (combined with discussions between NZTA and the Ministry, and Ministerial decisions) informed our initial identification, longlisting, and prioritisation of potential interventions.

Officials will use consultation feedback to develop final recommendations and a final amendment Rule for the Minister.

Section 2: Assessing options to address the policy problem

What criteria will be used to compare options to the status quo?

The Government sets requirements for heavy vehicles to maintain road safety and the condition of the road network. The regulatory system should balance these matters with the need for heavy

vehicle operators to operate efficiently and be productive. Therefore, these factors have shaped the following assessment criteria:

1. **Efficiency** – the effect on compliance costs for operators, NZTA, Police, and RCAs
2. **Sustainability** – the effect on wear to road network infrastructure, including Police’s ability to enforce the requirements
3. **Safety** – the effect on the safety of road users
4. **Productivity** – the effect of removing regulatory barriers that may be inhibiting operators from increasing their productivity.

What scope will options be considered within?

The Government Policy Statement on land transport 2024 includes a commitment to review the vehicle regulatory system to reduce regulatory burden and ensure that rules are fit-for-purpose. In June 2025, Cabinet agreed to the direction for the Rules Reform programme [ECO-25-MIN-0083 refers]. The Minister directed officials to explore the specific proposals in this interim RIS, as phase one of the wider Rules Reform programme. These proposals have been informed by sector engagement and discussions with Ministry and NZTA officials.

As the policy problems identified arise from current legislation, legislative change is deemed a more appropriate solution than operational changes. The proposals are limited to changes that can be made through amendments to VDAM Rule, the Land Transport Rule: Heavy Vehicles 2004, and the Land Transport (Offences and Penalties) Regulations 1999.

NZTA is also exploring operational changes to digitise the heavy vehicle permitting system, which may complement some proposals in the Rules Reform programme.

What options are being considered?

Option One – Status Quo

- 50MAX vehicles will require permits.
- HPMVs will be required to display H plates.

Option Two – Legislative change

This option would:

- remove the requirement for 50MAX vehicles to have permits.
- remove the requirement for HPMVs to display H plates.

How do the options compare to the status quo?

	Option One – <i>Status Quo</i>	Option Two – <i>Regulatory Option</i>
Efficiency	0	++
Sustainability	0	0
Safety	0	0
Productivity	0	+
Overall	0	3

Removing the H plate and 50MAX permit requirements is the highest-ranking option. If implemented, this indicates the likely realisation of efficiency improvements for industry, NZTA, and Police. Officials expect the removal of 50MAX permits and H plate requirements to contribute to a more permissive, outcomes-focussed regulatory environment for road transport.

Option One – Status Quo

	50MAX permits	H plate requirement
Efficiency	The 50MAX permit requirement poses administration costs to NZTA, operators, and RCAs, but 95 percent of applications are approved. From August 2022 to July 2024, NZTA processed 13,503 permit applications from 1,486 operators. From September 2023 to 2024, NZTA's average application processing time was 7 working days. Around 95 percent of these applications were approved. Permit requirements also impose a cost to the sector: - The fee for new permit applications is \$32.13 and the permit renewal application fee is \$16.31. - From August 2022 to July 2024, there were 8,003 new applications and 5,500 renewals. - This amounts to a cost to the sector of \$346,841.39 over the 2-year period. - In addition to application fees, operators face additional costs, for example, the time cost of administrators.	From October 2022 to October 2024, an estimated 43,530 vehicles had successful HPMV permit applications, making them subject to H plate requirements. Of these successful applications: - around 14,300 were new - assuming these applicants had to purchase new plates, at a cost of \$30 each with two required to be displayed on the vehicle, this is an annual cost to the sector of about \$429,000. This does not include the costs for existing HPMVs to replace damaged H plates. Operators also bear costs from inappropriate enforcement: - A total of 433 H plate offences were recorded between mid-2010 to late-2025. Of these, 257 offences (60 percent) were either waived or withdrawn. - H plates only indicate that a vehicle may be used as an HPMV and does not reflect its current load characteristics. Most vehicles have the H plate permanently attached to the vehicle as a sticker, so is often displayed even when the vehicle is operating without a load. - NZTA has received anecdotal information from industry about incorrect enforcement of H plates. For example, when a HPMV is driving on a road not normally available for general access, but is allowed to as it is not carrying a load and thereby not operating under a permit. Without removing the requirement to display H plates, we would expect continued cases of incorrect enforcement into the future. This imposes avoidable costs on operators who are compliant.
Sustainability	50MAX vehicles that meet existing proforma designs are intended to have no more wear on the road per tonne of freight than other HPMVs. The permit requirement for 50MAX vehicles enables RCAs to impose conditions on where these vehicles can travel, preventing their use on infrastructure that may not be able to support the heavier overall vehicle weight.	Police considers that H plates do not serve their intended purpose of helping to enforce the requirements for HPMVs to prevent road damage or crashes.
Safety	50MAX permits are not road safety tools. There is no evidence that they have any effect on road safety outcomes.	H plates are not road safety tools. There is no evidence that they have any effect on road safety outcomes.
Productivity	50MAX permit requirements may have a small cost to productivity as operators spend time and money applying for permits. Time delays between applying for a 50MAX permit and it being granted may also limit productivity for operators, as they cannot operate a vehicle at mass during this period.	The H plate requirement may have a small cost to productivity as operators spend time and money ensuring they comply with requirements. A 2015 Castalia report prepared for the Ministry estimated the HPMV regime could deliver \$502 million in net benefits between 2015 and 2045. There is room to deliver additional benefits, considering that options to increase HPMV and 50MAX uptake could see benefits totaling over \$1.1 billion.⁵ However, the proposals addressed in this RIS as phase one of heavy vehicles Rules Reform are unlikely to see such benefits on their own.

⁵ Vehicle Dimensions and Mass Review: Framework for Options Assessment & Draft Rule Change Cost Benefit Analysis Report to the Ministry of Transport November 2015. <https://www.transport.govt.nz/assets/Uploads/Report/VDAM-Review-CBA-Castalia.pdf>

Option Two – Regulatory Option

	50MAX permits	H plate requirement
Efficiency	Removing the 50MAX permit would remove annual direct costs to the sector of around \$173,420. It would also allow operators more flexibility with their vehicle fleet. For example, in the case of a breakdown, a vehicle’s load could be redistributed onto other vehicles. Removing 50MAX permits would reduce administration burdens for NZTA, allowing it to focus administrative work on higher-risk heavy vehicle operators. The Castalia report found a benefit to cost ratio of 17.4:1 from removing 50MAX permitting but retaining route restrictions and proforma requirements (as proposed in this interim RIS). The report assumed that permitting would still be required on 50MAX trucks using rural roads.	Removing the H plate requirement would save a minimum of \$429,000 to the sector annually in H plate costs. The sector would also not have to spend time purchasing, attaching, or maintaining the plates.
Sustainability	The requirements for 50MAX vehicles would still be enforced to prevent damage to the road network. Access restrictions on certain roads would still apply, as specified by the Director. The VDAM Rule would require operators to keep a copy of a proforma specifying the requirements and access restrictions for their specific vehicle. This would remove the need for a 50MAX permit while still providing advice, deterrence and enforceability to minimise infrastructure damage.	Officials consider there would be no impact on the road network from the H plate change. Analysis in the above table suggests that enforcement of the requirements for HPMVs is not currently reliable. Through consultation, we expect to receive feedback on options that may improve the reliability of enforcement of access restrictions for HPMVs.
Safety	50MAX permits are not road safety tools. Officials are not aware of any evidence that indicates removing them could affect road safety outcomes. 50MAX trucks must meet the same high safety standards as other HPMVs, including increased resistance to roll over and the inclusion of electronic braking systems.	Officials are not aware of any evidence that suggests removing H plates would affect the road network or road safety. HPMVs would still be subject to the access requirements for their permit or as specified by the Director.
Productivity	Compliance costs for higher productivity 50MAX vehicles will be reduced. Removing 50MAX permits will free up industry and government time to pursue more productive work.	Removing H plate requirements reduce compliance costs for industry, enabling them to pursue more productive work.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

Option Two: Regulatory Option would best address the policy problem and meet the objectives. The effects of the changes are likely to have the greatest benefits for operators and for NZTA. The regulatory system will be more fit-for-purpose and compliance costs will be reduced. As permit fees are set on a cost-recovery basis, the loss of revenue is unlikely to affect NZTA.

Removing the H plate requirement will simplify the requirements for HPMVs and Police, and operators may find that inappropriate enforcement activity is reduced.

The ratio of benefits to costs is not expected to change over time.

Is the Minister's preferred option in the Cabinet paper the same as the agency's preferred option in the RIS?

The proposals set out in this interim RIS and consultation document align with the high-level proposals approved by Cabinet in June 2025. This interim RIS does not accompany a Cabinet paper as Cabinet has delegated the Minister of Transport authority to approve the release of the consultation document. This section will be updated in the final RIS.

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MINISTRY OF TRANSPORT TE MANATU WAKA

What are the direct marginal costs and benefits of the preferred option?

Affected groups	Comment	Impact	Evidence Certainty
Direct costs of the preferred option			
Heavy vehicle operators	None	None	High
NZTA as a regulator	NZTA as a regulator may have to scale their existing online proforma regime to include the requirements and access restrictions for 50MAX vehicles. Technology for commercial vehicle safety testing like weigh-in-motion may need updates to reflect removal of permitting requirements for 50MAX.	Low/Medium – NZTA already provides proforma designs online.	High
NZTA as an RCA	NZTA as an RCA may need to change current methods of monitoring HPMVs using the network, following the removal of H plates. These changes may also be needed in relation to 50MAX vehicles with the removal of 50MAX permitting requirements. As an RCA, NZTA may need to work to establish regular updates to its approved network for 50MAX vehicles, to enable faster notification of any route restrictions for 50MAX operators.	Medium – some changes to existing monitoring systems and processes may be required to support the changes to permit requirements for 50MAX and H plates.	Medium
Other RCAs	RCAs may need to change current methods of monitoring 50MAX and other HPMV vehicles using the network, following the removal of permitting and H plate requirements. RCAs may need to work with NZTA as a regulator to establish regular updates to the approved network for 50MAX, to enable faster notification of any route restrictions for 50MAX operators.	Medium – some changes to existing monitoring systems and processes may be required to support the changes.	Low
Police	Police may need to work with RCAs and NZTA as a regulator and RCA to support changes to enforcement needed as a result of the proposed changes for 50MAX permitting and H plates.	Medium/Low – some changes to the approach to enforcing access restrictions for heavy vehicles may be required with the removal of H plates. The proposed changes to permitting requirements for 50MAX would see Police still referring to currently used documentation. However, extra training may be needed for any additional information that is incorporated into the proforma documentation but not necessarily relevant for enforcement purposes.	High
Retailers	There will be a negligible loss of revenue for retailers who sell H plates.	Low – retailers are generally large and sell other products. H plates are relatively inexpensive at around \$30 each.	Medium
Total monetised costs		—	—
Non-monetised costs		Low	High

Direct benefits of the preferred option			
Affected groups	Comment	Impact	Evidence Certainty
Heavy vehicle operators	Operators will see reduced compliance costs from the removal of H plate and 50MAX permit requirements. Inappropriate enforcement may be reduced.	Medium - H plates and 50MAX permit fees have an annual monetary cost to the sector of approximately \$550,420 or higher. Low - a total of 433 H plate offences were recorded from 2010 to mid-2025.	High Low
NZTA as a regulator	Changes to permitting requirements will reduce administrative burden to NZTA.	High – from August 2022 to July 2024, NZTA processed 13,503 permit applications. From September 2023 to 2024, the average application processing time was 7 working days.	High
NZTA as an RCA	Reduced confusion from members of the public regarding the meaning of H plates, and less time spent resolving possible non-compliance with display requirements.	Low – NZTA is aware of confusion from the public about the meaning of H plates.	Medium – it is unclear how significant an issue this is and how much resource is spent following up with H plate vehicles who are the subject of public queries.
Other RCAs	Reduced confusion from members of the public regarding the meaning of H plates	Low – we have had some indications from RCAs of confusion from the public about the meaning of H plates.	Medium – it is unclear how significant an issue this is and how much resource is spent following up with H plate vehicles who are the subject of public queries.
Police	Simplified permitting requirements may be easier for Police to enforce.	Low – enforcement of H plates is infrequent. In a 15-year period, only 433 infringements were issued, and 60 percent were waived or overturned.	High
Total monetised benefits		\$550,420	High
Non-monetised benefits		Medium	High

Section 3: Delivering an option

How will the proposal be implemented?

Subject to Ministerial approval, the Ministry anticipates that final Rule amendments will be signed by the Minister in May 2026.

NZTA will be responsible for the implementation and ongoing operation of the changes impacting its role as road transport regulator, and RCA for state highways.

RCAs who provide their own permit services will remain responsible for changes such as communicating the changes to local operators and internal operational policy changes.

Police will retain responsibility for roadside enforcement.

NZTA will develop a communications plan to support implementation. This will include:

- notifying RCAs and the industry of any changes through normal channels, including its website, media releases, email list and industry newsletters
- updating existing information on the NZTA website and Vehicle Inspection Requirements Manuals to reflect any changes to permitting requirements for 50MAX, and
- supporting the provision of internal training for compliance officers, and external training for Police involved in commercial vehicle safety testing.

There is a risk that changing the regulations may affect compliance

There is the potential for increased infrastructure damage with these proposals. This is if the removal of 50MAX permits and H plate display requirements decreases compliance and more 50MAX vehicles and other HPMVs operate outside the approved network.

There is a risk that the removal of 50MAX permitting could see an increase in non-compliance by 50MAX operators. Clause 5.2(4) of the VDAM Rule allows RCAs to consider the applying operator's previous breaches of permit conditions and other 'traffic offending' history when deciding whether to issue an operator with a permit. Removing the permit requirement for 50MAX could reduce the ability for RCAs to prevent operators with previous breaches or a history of other traffic offences from operating on their network.

Officials are investigating possible mitigations to this risk, such as using NZTAs Transport Service Licence (TSL) regime as an enforcement tool. Under the TSL option, NZTA could revoke the TSL of non-compliant operators. As this is a harsher penalty than losing a permit, operators may improve their compliance. Officials are also investigating possible amendments to the Land Transport (Offences and Penalties) Regulations 1999 to encourage compliance.

How will the proposal be monitored, evaluated, and reviewed?

Regulated parties and other stakeholders will be able to raise concerns with NZTA and the Ministry through existing channels.

The Ministry and NZTA will establish a monitoring and evaluation plan for these proposals, to track and assess intended and potential unintended effects.