



24 June 2026

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Hon Chris Bishop

Action required by:

Minister of Transport

Thursday, 9 July 2026

Hon Louise Upston

Minister for Disability Issues

ADVICE ON TOTAL MOBILITY PROPOSALS AFTER PUBLIC CONSULTATION

Purpose

Seek your decisions on which Total Mobility proposals to progress following public consultation.

Key points

- From 1 July 2026, previously agreed Total Mobility funding changes will take effect to help stabilise scheme costs and substantially reduce the forecast funding gap through to 2030.
- The Ministry of Transport publicly consulted on six proposals to strengthen the Total Mobility scheme for funders and users between 16 December 2025 and 22 March 2026. A total of 564 submissions were received, and we met with around 200 people to listen to their feedback.
- Following public consultation, we recommend progressing four proposals: adopting a clear purpose statement; strengthening incentives to provide wheelchair accessible vehicles (WAVs); progressing design work on a Crown-funded national public transport concession for Total Mobility users with a companion fare; and reviewing standards and safeguards to enable new Total Mobility providers, including ride-hail services, to participate.
- Collectively, this package would improve national consistency, expand transport choice for some disabled people, and support access to mainstream public transport when appropriate. This approach supports the Government's obligations under the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD), particularly Article 3, which emphasises dignity, autonomy, participation, inclusion, equality of opportunity, and accessibility.
- We recommend you do not progress the proposals on universal documentary evidence requirements, mandatory periodic reassessments, or nationally-mandated trip caps. These options would add new costs and administrative burden for disabled people and scheme

administrators, be challenging to implement, or apply a common limit to users with very different levels of need in a way that could result in those with higher needs missing out.

- There are some trade-offs. Strengthening incentives for WAVs and introducing a national public transport concession for Total Mobility users could create modest fiscal pressure for the National Land Transport Fund (NLTF) or the Crown. Enabling ride-hail could also weaken existing efforts to stabilise costs if lower fares increase demand, although public transport authorities (PTAs) would still retain discretion over whether to contract these providers in their region.
- The recommended package would not fully resolve inconsistency in assessments or tightly target support to those with the greatest need, which were the other objectives of the consultation. However, the NZ Transport Agency (NZTA) has work underway to update requirements for PTAs, which is likely a more proportionate way to achieve these objectives.
- We therefore also recommend a complementary workstream in addition to consultation proposals: asking NZTA to further update its Total Mobility requirements for PTAs to support more consistent assessment practice.
- Cabinet previously agreed to a report-back on Total Mobility in late 2026. Officials consider this would not be necessary for the recommended package, which would be uncontroversial and most follow-up work can proceed through existing processes. Cabinet approval would only be sought if future funding or policy decisions are needed. We recommend you agree this approach with the Cabinet Office.

Recommendations

We recommend you agree to:

	Minister of Transport	Minister for Disability Issues
1. adopt the following proposed purpose statement for Total Mobility: <i>To provide subsidised, accessible transport options to disabled people, and people living with long-term impairments, who are unable to access public transport, to live their lives and participate in work, education, and their community</i>	Yes / No	Yes / No
2. set expectations of NZTA to review the supply and demand of WAVs providing Total Mobility services, including whether existing requirements and incentives are adequate to meet current and future needs AND direct officials to provide further advice on whether to use Crown funding for WAVs as a longer-term alternative to NLTF funding, including considering opportunities for coordination across other Crown-funded accessible transport supports	Yes / No	Yes / No
3. progress design work on a Crown-funded national public transport concession for Total Mobility users with a companion fare	Yes / No	Yes / No
4. set expectations of NZTA to review standards and safeguards for Total Mobility providers, with a view to enabling new providers, including ride-hail services, to participate where appropriate	Yes / No	Yes / No

- | | | |
|--|----------|----------|
| 5. set expectations of NZTA to further update its Total Mobility requirements for PTAs to improve the consistency of assessments | Yes / No | Yes / No |
| 6. take no further action on the following proposals: | | |
| a. mandatory documentary evidence requirements for all new applicants | Yes / No | Yes / No |
| b. mandatory periodic reassessments for all Total Mobility users | Yes / No | Yes / No |
| c. nationally-mandated trip caps for Total Mobility users | Yes / No | Yes / No |
| 7. close the Total Mobility review | Yes / No | Yes / No |
| 8. confirm with the Cabinet Office to not report back to Cabinet unless and until policy or funding decisions are sought | Yes / No | Yes / No |
| 9. announce your decisions in a press release. | Yes / No | Yes / No |



Ruth Fairhall
Deputy Chief Executive, Policy Group,
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23/06/2026



Rebecca Elvy
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23/06/2026

Hon Chris Bishop
Minister of Transport

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Hon Louise Upston
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Minister's office to complete:

☐ Approved

☐ Declined

☐ Seen by Minister

☐ Not seen by Minister

☐ Overtaken by events

Comments

Contacts

Name	Telephone	First contact
Marian Willberg, Manager Maritime, Freight and Access, Ministry of Transport	s 9(2)(a)	
Danny Eyre, Principal Adviser, Ministry of Transport		✓
Diana Cook, Manager Policy and Insights, Ministry of Disabled People		

ADVICE ON TOTAL MOBILITY PROPOSALS AFTER PUBLIC CONSULTATION

We seek your decisions on which Total Mobility proposals to progress following public consultation

- 1 You jointly announced funding changes on 16 December 2025 to substantially stabilise cost pressures for the Total Mobility scheme (Total Mobility) to 2030. These changes include reducing subsidies for Total Mobility users from 75 percent to 65 percent and reducing regional fare caps by approximately 10 percent from 1 July 2026. The Ministry of Transport will closely monitor the impact of these changes on demand, costs and user access against forecasts and provide updates on how costs are tracking once available.
- 2 Following the funding announcement, the Ministry of Transport publicly consulted on six proposals to strengthen Total Mobility for users and funders in the longer term. The proposals sought to provide fair, consistent and more sustainable access to Total Mobility for people with the greatest need. Consultation ran from 16 December 2025 to 22 March 2026.
- 3 This briefing seeks your decisions on which Total Mobility proposals to progress following public consultation. We assessed the proposals against four criteria: consistency, financial sustainability, enabling disabled people to go about their daily lives, and ease of implementation.

We recommend progressing four of the six Total Mobility proposals that were publicly consulted on

- 4 The Ministry of Transport and the Ministry of Disabled People recommend a package of policy changes that will improve national consistency, expand transport choice where practical, and provide access to mainstream public transport where it is a realistic substitute for some trips. The package would avoid broad new assessment or trip-control requirements as costs would be disproportionate to the likely benefits.
- 5 The principal trade-offs are that some proposals could create modest fiscal pressure, and the recommended package may not fully resolve inconsistent assessments or tightly target support to those with the greatest need. The high-level rationale for these recommendations is set out in Table 1, with detailed proposal analysis in Annex 1 and a summary of consultation themes in Annex 2.

Our recommended package is informed by feedback from public consultation

- 6 We received 564 submissions and met with about 200 people, through which we received constructive, informed and robust feedback from Total Mobility users and providers, carers and whānau of disabled people, public transport authorities, and organisations who represent or advocate for disabled people and seniors.
- 7 Broadly, consultation supported the direction of most proposals we recommend progressing. There was support for a clear national purpose statement, although concern over the specific drafting. We have redrafted the purpose statement to mostly address these concerns. Introducing ride-hail providers was polarising, with nuanced comments reflecting concern

about implementation, such as maintaining appropriate standards. This would be considered further by reviewing standards and safeguards.

- 8 Proposals relating to assessments – documentary evidence of impairment and mandatory reassessment – as well as introducing nationally-mandated trip caps were contentious and widely opposed. The disability community viewed these proposals as administratively burdensome, costly and likely to undermine community participation.

Table 1: High-level decision summary

Proposal	Recommendation	Main reason	Cost / implementation notes
Adopt a clear, national purpose statement	Progress	Provides clearer policy direction and a stronger basis for national consistency.	No direct Crown cost. Low implementation effort.
Strengthen WAV incentives	Progress	Could improve the supply and availability of wheelchair accessible vehicles.	Could create modest NLTF or Crown pressure depending on design. Medium implementation effort.
Progress design work on a Crown-funded national public transport concession for Total Mobility users with a companion fare	Progress	Would improve national consistency and address a practical barrier for some Total Mobility users.	Could require low to modest Crown funding but could reduce Total Mobility costs. Medium implementation effort.
Review standards and safeguards for Total Mobility providers, with a view to enabling new providers	Progress	Could expand user choice and improve competition where safety and quality standards are maintained.	May increase demand if fares are lower, which could undermine cost stabilisation. Medium implementation effort.
Introduce universal documentary evidence requirements and mandatory reassessments	Do not progress	Would add burden and cost for users, assessors and PTAs, with limited likely targeting of high need or changes in fiscal savings.	No direct Crown cost. Minimal savings if progressed (administrative costs likely to offset savings).
Introduce nationally-mandated trip caps	Do not progress	Fiscal savings would be modest relative to the complexity and equity trade-offs.	Would require further system design and substantial administrative effort.

The recommended package of proposals would improve clarity, transport choice, and national consistency

- 9 The recommended package would largely complement the funding changes already agreed from 1 July 2026.

Recommendation 1: Adopt a clear, national purpose statement

- 10 A clear purpose statement would improve national consistency and would be low-cost to implement. It would provide a stronger policy anchor for Total Mobility and help align national guidance, public expectations, and regional decision-making. It would not, by itself, resolve variation in assessment practice, but it would provide a clearer foundation for NZTA's operational requirements of PTAs and any future scheme decisions.

- 11 We consulted on the following purpose statement:

to provide subsidised mobility services to disabled people who are unable to access public transport because of an impairment, to support them to live their lives.

- 12 In response to consultation feedback, we propose Total Mobility's purpose statement to be:

To provide subsidised, accessible transport options to disabled people, and people living with long-term impairments, who are unable to access public transport, to live their lives and participate in work, education, and their community.

- 13 Alignment of Total Mobility's purpose with the UNCRPD was referenced frequently by the disability community during public consultation. Broadly, the revised purpose statement better supports some of the UNCRPD's core principles of accessibility and independence. It also recognises that transport access enables disabled people to participate in society.

Recommendation 2: Strengthen WAV incentives

- 14 Limited availability of WAVs remains a barrier for some Total Mobility users. WAV supply has not materially improved, implying the current incentive settings are not sufficient to increase the number and availability of accessible vehicles, particularly outside standard hours.
- 15 The issue is not simply the total amount of funding available. Grant funding for WAV hoist purchase and installation has generally been underspent. Under the NLTF 2024–27, \$3.33 million was approved but only around \$865,000 has been claimed after two years, and only \$795,000 was claimed under NLTF 2021–23.
- 16 Consultation feedback reinforced that the current grant settings are not sufficiently attractive or consistent across regions to materially increase WAV supply. The NLTF currently funds 60 percent of eligible grant costs, with PTAs funding the remaining 40 percent. This means smaller PTAs may offer lower grants than are needed to materially change the economics of WAV purchases.
- 17 The existing payment to providers of each WAV trip is \$10+GST and has not been updated since it was introduced in 2005. This means the real value of the payment has declined significantly, reducing its effectiveness as an incentive for operators to provide and prioritise accessible services. Increasing the payment to around \$15 per trip, broadly in line with inflation since 2005, would add an estimated \$4.2 million over three years to current NLTF costs. By comparison, increasing the payment to \$20 or \$25 per trip would add an estimated \$8.7 million or \$12.9 million respectively over three years.
- 18 Two options are available to strengthen WAV incentives: use existing NLTF mechanisms or develop a direct Crown-funded incentive. The NLTF option would use established mechanisms, but NZTA has independence over NLTF investment decisions. The Minister of Transport can, however, set expectations of NZTA to review the incentives and provide criteria for setting Funding Assistance Rates (FAR). This is our recommended approach as it will enable more timely increases to WAV incentives.
- 19 Alternatively, or over a longer timeframe, Ministers could seek to use Crown funding to direct incentive levels. This may be a more principled approach given that there is a weak link between increasing WAVs and the user-pays principle underlying the NLTF, although the overall funding is small relative to the overall NLTF. It could also be an opportunity to better

coordinate Crown support across related systems (for example, Total Mobility, MSD, ACC and the Specialised School Transport Assistance schemes).

- 20 While this could be an alternative to reviewing NZTA mechanisms, we recommend progressing consideration of direct Crown funding as a second, complementary step.

Recommendation 3: Progress design work on a Crown-funded national public transport concession for Total Mobility users with a companion fare

- 21 A Crown-funded national public transport concession for Total Mobility users with a companion fare would improve national consistency as currently only five PTAs offer this type of concession. It may also help manage rising demand for Total Mobility services if it encourages users with fluctuating needs to use public transport more often. Consultation feedback was clear that the main rationale is not fare affordability alone, however. Our recommendation includes a free companion fare to address a practical barrier for some Total Mobility users who cannot use public transport independently but could with support.
- 22 NZTA's current high-level estimate is that such a concession would cost approximately \$1.4 million to \$2.7 million per year, depending on the level of concession and final eligibility settings. This cost is relatively modest as the newly benefited cohort would be only a subset of Total Mobility users, given many already qualify for other concessions¹ and only a subset of users is likely to shift some trips from Total Mobility to scheduled public transport with companion support.
- 23 It is likely that this would require new Crown funding, depending on any financial headroom created from last year's funding decisions. Further work would be needed to design eligibility, delivery, funding, and how it would interact with existing PTA concessions.

Recommendation 4: Review standards and safeguards for Total Mobility providers, with a view to enabling new providers

- 24 If ride-hail services became Total Mobility providers, it could expand choice for users who are able to use these services, improve availability in some areas, and reduce fares for some trips. However, lower fares could increase demand and overall scheme costs, weakening the cost-stabilising effect of the funding changes already agreed.
- 25 There are also concerns that ride-hail services may not be suitable for all Total Mobility users, particularly people who are more vulnerable or need a higher level of assistance. Consultation feedback and operational experience point to issues such as higher complaint rates, service refusals, and opposition from parts of the disability community. Some PTAs are also reluctant to include ride-hail providers, citing possible increased demand and cost, as well as safety concerns.
- 26 While ride-hail services may be a cheaper alternative for those who can use them, there is a risk that their inclusion would reduce the commercial viability of the taxi firms that are more likely to provide WAVs and other supports for high need users. However, available evidence from the Australian state of Victoria found that around 10 percent of trips are now provided

¹ Total Mobility users over 65 qualify for free off-peak public transport through the SuperGold Card and those on limited incomes may qualify for a 50 percent concession through the Community Services Card.

by ride-hail services since its introduction to its equivalent scheme in 2019, with traditional taxis still providing around 90 percent of trips.

- 27 Enabling ride-hail is a more finely balanced judgement between managing costs, broadening options for some users, and maintaining appropriate standards. On balance, we recommend asking NZTA to review the existing Total Mobility provider standards, safeguards and procurement guidelines to ensure they are fit for purpose for a wider range of providers, including ride-hail services. This would not in itself enable ride-hail participation across all regions but would create a pathway for participation where providers meet safety standards and PTAs choose to contract them.

We recommend avoiding broad controls that would add cost and complexity

- 28 We recommend not progressing the following proposals following consultation:

- 28.1 **Universal documentary evidence requirements** would add cost and complexity for applicants and could create additional barriers for people with low incomes or limited access to health professionals. A medical assessment may not reflect a person's ability to use public transport, particularly for those with invisible or fluctuating conditions, such as cognitive impairments, autism or mental health conditions. Because eligibility for Total Mobility is fundamentally a functional assessment, a blanket documentary threshold is unlikely to improve decision quality sufficiently to justify the burden it would create for individuals and the health system. Updated NZTA requirements for PTAs provide that assessors can request documentary evidence where the assessor considers it necessary.
- 28.2 **Mandatory periodic reassessments** for all Total Mobility users would require many people to repeatedly demonstrate an ongoing need even where their impairment is lifelong, degenerative, or unlikely to improve. Given the scale of the existing user base (120,000 existing users) and expected growth from an aging population, a universal requirement would impose substantial workload on assessors and PTAs while likely delivering only small savings. A more proportionate approach is to continue targeted reassessments where an impairment is temporary, fluctuating, or otherwise expected to change.
- 28.3 **Nationally-mandated trip caps** would modestly improve budget predictability (previous modelling indicated a monthly cap of 40 trips would reduce the fare subsidy by 1.4 percent) but would also move Total Mobility away from a needs-based model and risk limiting essential travel for users with high needs. Of the two models consulted on, a flat trip cap would apply a common limit to users with very different levels of need, while a personalised cap based on need would be very challenging to implement.

Recommendation 5: Better operational practice can support targeting and reduce misuse

- 29 Taking forward the recommended four of the six proposals consulted on would improve clarity and expand transport choice for Total Mobility users. However, it may not fully resolve inconsistency in assessments or tightly target support to those with the greatest need. Therefore, we also recommend setting expectations of NZTA to further update its *Total*

Mobility Requirements for Public Transport Authorities to support better assessment consistency and targeting. Enabling the consistent application of operational rules would be a more proportionate approach to improving eligibility consistency and targeting than increasing evidence requirements, mandating re-assessments or introducing fare caps.

30

s 9(2)(f)(iv)

The recommended package has limited immediate costs but needs further design work

- 31 The recommended package has limited immediate financial implications. Adopting a purpose statement would not create direct Crown costs. Strengthening WAV incentives through existing NLTF settings could create modest NLTF pressure depending on NZTA's final investment decisions. For example, increasing the \$10 WAV trip payment to \$15 could cost \$4.2 million over three years. A national public transport concession for Total Mobility users with companion fare would likely require low to modest Crown funding, currently estimated at \$1.4 million to \$2.7 million per year.
- 32 Most recommendations would require further design before implementation. The purpose statement could be implemented through updated national guidance with low effort, but WAV incentives, the national public transport concession for Total Mobility users, and standards and safeguards for new providers, including ride-hail services would require further work by the Ministry of Transport, NZTA and the Ministry of Disabled People.
- 33 The disability community and PTAs are likely to view the recommended package positively, though there could be apprehension around implementation, particularly the timing of further work. The disability community is likely to be pleased if you agree with our recommendation not to progress proposals on assessments and nationally-mandated trip caps. Current Total Mobility providers may be concerned that enabling new providers could affect service volumes and commercial viability.
- 34 NZTA supports the proposed approach, noting that delivery will need to be resourced and sequenced alongside existing Public Transport work programme commitments and available capacity. The Ministry for Social Development (MSD) supports the recommended package and notes that it would benefit disabled people including those with age-related disabilities.

Further work is not reliant on the Total Mobility review remaining open

- 35 The current review of Total Mobility (the Review) has been ongoing since 2023, and its delayed completion has caused uncertainty for the disability community and PTAs. The purpose of the review is to establish how Total Mobility operates and how it can be improved to create better outcomes for disabled people.
- 36 Following your decisions on which proposals to progress, and alongside the funding changes taking effect from 1 July 2026, we are comfortable that the terms of reference of the Review have been addressed, and any further work or monitoring resulting from your decisions can be progressed as business as usual. We recommend closing the Review.

Next steps

- 37 If you agree, officials will finalise the Total Mobility purpose statement and NZTA will update national guidance to reflect it. We then propose to sequence implementation in tranches, recognising existing resourcing constraints and the different levels of design work required. We propose:
- 37.1 Tranche 1: Strengthen WAV incentives, given the strong consultation support and clear implementation pathway through NZTA.
 - 37.2 Tranche 2: Progress further design of a national public transport concession for Total Mobility users with a companion fare. This will include refined costings, eligibility and delivery options, implementation requirements, and whether the concession could reduce some Total Mobility demand over time.
 - 37.3 Tranche 3: Ministry of Transport and Ministry of Disabled People officials to provide further advice on whether to use Crown funding for WAVs as a longer-term alternative to NLTF funding, including considering consolidating other Crown disability supports.
 - 37.4 Tranche 4: NZTA to review provider standards and safeguards for new Total Mobility providers, including ride-hail services, given the more finely balanced safety, quality and cost considerations.
- 38 Officials will not progress the proposals that are not recommended in this paper unless Ministers request further advice.
- 39 The Cabinet minute (SOU-25-MIN-0159 refers) noted that Ministers would report back to Cabinet in the second half of 2026, including for any additional policy approvals. If you agree to the proposed recommendations, officials' assessment is that most agreed follow-up work can proceed through ministerial direction, updated guidance, NZTA processes, or further design work. Cabinet approval would only be required if future funding or policy decisions are needed. We recommend you agree this approach with the Cabinet Office. We can support you to advise your colleagues of your decisions, if needed.
- 40 Once decisions on these proposals are made, we recommend closing the Review, with any agreed follow-up work delivered through standard work programmes. Officials can draft a press release to announce your decisions on the proposals to take forward and the closing of the Review. We can work with your office on timing for releasing this. Officials will also release a departmental summary of submissions, based on Annex 2, on the Ministry of Transport website.

ANNEX 1: DETAILED ANALYSIS OF TOTAL MOBILITY PROPOSALS

Annex 1 provides detailed information on each proposal considered during public consultation. It supports the main briefing by outlining the issue, our recommended approach and key rationale, and the financial or implementation implications. Table 1 presents the proposals we recommend for progression while Table 2 presents those we do not recommend progressing.

Annex 1 Table 1: Recommended proposals to progress

Proposal	Context and issue	Options and recommendation	Costs, resourcing and implementation
Introduce a clear, national purpose statement	Total Mobility does not have a clear national statement of purpose endorsed by Cabinet. We consulted on the following purpose statement: <i>to provide subsidised mobility services to disabled people who are unable to access public transport because of an impairment, to support them to live their lives.</i> Consultation and operational feedback suggest this contributes to variation in how Total Mobility is understood and applied across regions, including differences in expectations about who Total Mobility is for, what outcomes it is intended to support, and how it should relate to other parts of the transport system. Consultation feedback indicated broad support for greater clarity about the purpose and role of Total Mobility.	Options are to retain the current position or adopt a clear purpose statement through national guidance to PTAs. Reflecting on consultation feedback, we recommend adopting the following purpose statement: <i>To provide subsidised, accessible transport options to disabled people, and people living with long-term impairments, who are unable to access public transport, to live their lives and participate in work, education, and their community.</i> This revised purpose statement has added a focus on economic and social participation relative to the purpose statement included in the consultation document. This reflected strong feedback on the importance of enabling participation in the consultation process and is consistent with Article 19 of the UNCRPD, which recognises the equal right of disabled people to live independently and be included in the community. The wording links Total Mobility to public transport, recognises that some eligible users may have long-term impairments but not identify as disabled, and frames Total Mobility as supporting participation in work, education, and community life rather than simply subsidising trips.	No direct Crown cost is expected. Implementation can occur through updated national guidance and communications, with low administrative effort for the Ministry of Transport and NZTA.

Proposal	Context and issue	Options and recommendation	Costs, resourcing and implementation										
		This would provide clearer policy direction, support greater national consistency, and improve transparency for users, assessors, public transport authorities, and Total Mobility providers. It would not, by itself, resolve inconsistency in assessment practice, but it would provide a clearer basis for further operational improvement over time.											
Strengthen WAV incentives	Limited availability of WAVs remains a significant barrier for some Total Mobility users. New Zealand has a lower share of WAVs (~3 percent) than some comparable countries. Per capita, WAVs in New Zealand declined from 1 per 10,000 people in 2011 to 1 per 12,000 people in 2025. Wait times and reliability can also be poor, particularly outside of standard operating hours. This is relevant to Article 20 of the UNCRPD on personal mobility, which supports measures that improve disabled people’s ability to move with the greatest possible independence. Currently, the NLTF offers two incentives to support WAV supply: - grant funding to purchase or convert WAVs that is administered by PTAs (and supplemented with local share funding) - a payment per trip to the WAV operator to compensate for time to load and unload the WAV passenger. Grant funding receives a 60 percent Funding Assistance Rate (FAR), meaning that for a given amount of grants offered in a region, the PTA will fund 40 percent and the NLTF will fund 60 percent. In practice, PTAs choose to offer	Options are to retain current incentive settings, direct NZTA to strengthen incentives within the NLTF, or shift WAV incentives out of the NLTF to Crown funding. We recommend the Minister of Transport write to NZTA setting an expectation to review the effectiveness of existing WAV incentives and whether they are adequate to meet current and future needs. With appropriate caveats, a letter could set expectations for NZTA to review the effectiveness of existing incentives, including considering: - increasing the FAR rate for grant payments or standardising the grant levels - increasing the \$10 payment set in 2005 to a more effective contemporary level, and considering whether the FAR should be reduced to shift some cost to PTAs - considering a higher payment for after-hours use. This option would be relatively straightforward and the most expedient, although it gives ministers less direct control and would ultimately be dependent on NZTA’s Board. We also recommend further advice on whether direct Crown funding should be used for WAV incentives as a longer-term alternative to NLTF funding. This would be a	This proposal could create modest additional pressure on the NLTF if progressed through existing mechanisms. For example, NLTF 2024-27 has allocated \$3.3m for grant funding and \$10.5m for WAV use payments based on a \$10 fee. Increasing the FAR rate for grant payments is, in the first instance, likely to see more of the allocated funding used but may ultimately result in higher NLTF costs over time. <table><tr><th>Payment per trip</th><th>Additional cost over 3 years</th></tr><tr><td>\$10 (since 2005)</td><td>-</td></tr><tr><td>\$15</td><td>\$4.2m</td></tr><tr><td>\$20</td><td>\$8.7m</td></tr><tr><td>\$25</td><td>\$12.9m</td></tr></table> Direct Crown funding for WAV incentives would likely require similar funding to an equivalent NLTF-funded approach, although it could release some funding back to the NLTF. Further advice would be	Payment per trip	Additional cost over 3 years	\$10 (since 2005)	-	\$15	\$4.2m	\$20	\$8.7m	\$25	\$12.9m
Payment per trip	Additional cost over 3 years												
\$10 (since 2005)	-												
\$15	\$4.2m												
\$20	\$8.7m												
\$25	\$12.9m												

Proposal	Context and issue	Options and recommendation	Costs, resourcing and implementation
	different grant levels depending on how much budget they choose to commit. This creates inconsistency and consultation feedback suggested that grant levels are too low in some regions to effectively incentivise WAV uptake. The FAR for the use payment is set at 100 percent (meaning it is all funded from the NLTF). Decisions on these incentives fall with the NZTA's independence over NLTF investment decisions, although the Minister of Transport can set criteria that NZTA must consider under section 20C of the Land Transport Management Act 2003.	second, complementary step to NZTA's review and could consider whether related Crown disability transport supports, including MSD, ACC and the Specialised School Transport Assistance scheme, could be better coordinated. This would be a more principled approach given there is a weak link between incentivising WAV supply and the user-pays principle underpinning the NLTF and would give Ministers more control over incentive settings.	needed on funding source, incentive design, implementation responsibilities, and alignment with related Crown disability transport supports. This work should follow, rather than delay, NZTA's review of existing incentive settings.
Progress design work on a Crown-funded national public transport concession for Total Mobility users with a companion fare	Five PTAs currently fund a public transport concession for Total Mobility users that includes a free companion fare (Auckland, Wellington, Canterbury, Waikato and Bay of Plenty). This creates national inconsistency. Consultation feedback was clear that cost is not the primary barrier preventing many Total Mobility users from using scheduled public transport (given that Total Mobility eligibility is based on functional difficulty using those services). A fare discount on its own would therefore have limited effect on access. However, a nationally consistent concession for Total Mobility users with a companion fare would address the functional barrier to using public transport for some Total Mobility users. s 9(2)(f)(iv)	Options are to retain the current regional approach, introduce a national concession without a companion fare, or progress further work on a Crown-funded nationally consistent concession that includes a companion fare. We recommend the third option: progress further design work on a Crown-funded national concession with a companion fare. This would improve national consistency and address a practical barrier for some users, and, to the extent this diverts Total Mobility trips to public transport, it could also stabilise costs. The size of the newly benefited cohort is likely to be modest as 75 percent of Total Mobility users are over 65 and already eligible for the SuperGold Card and some users under 65 will qualify for Community Services Card concessions. The main rationale is therefore companion support and consistency, rather than broad fare affordability.	A national concession with companion fare would likely require low to modest Crown funding. NZTA's current high-level estimate is approximately \$1.4 million to \$2.7 million per year, depending on the level of concession. Further policy, costing, and implementation work would be required with NZTA and the Ministry of Disabled People. Further work is needed on eligibility, delivery, funding, and any relationship with existing local concessions. There is a risk that linking a concession to Total Mobility eligibility would increase demand for Total Mobility.

Proposal	Context and issue	Options and recommendation	Costs, resourcing and implementation
Review standards and safeguards for new providers, including ride-hail services	Total Mobility is currently delivered mainly through contracted taxi and specialist transport providers. These providers must meet minimum standards set by NZTA, such as driver training standards for assisting people with disabilities, as well as any additional standards set regionally. For example, each new Total Mobility driver needs to have been trained in: • NZQA unit standard 1748 (Passenger service: demonstrate skills required to assist passengers with special needs), and/or • an equivalent council-approved training course. Drivers of WAVs must also be trained in: • NZQA Unit Standard 15165 (Transport passengers in wheelchairs using Total Mobility vehicles equipped with hoist), or • an equivalent council-approved course. Enabling new providers, including ride-hail services, to participate could increase choice, improve availability in some areas, and reduce fares for users who are comfortable using those services. However, ride-hail may not be suitable for all Total Mobility users, particularly people who need a higher level of assistance. Consultation feedback and operational experience also point to concerns about safety, service quality, complaint procedures, and service refusals.	Options are to retain the current provider model, open Total Mobility to a wider range of providers under existing rules, or review standards and safeguards so that new Total Mobility providers, including ride-hail, can participate where appropriate. This is a more finely balanced judgement than the other proposals. On balance, we recommend further work is progressed to review whether current quality and safety standards and procurement guidelines are fit for purpose for a wider range of providers. This should be treated as an enabling proposal, rather than a decision that guarantees ride-hail participation across regions. In practice, PTAs would still decide which providers to contract with, and there is no clear mechanism to require them to admit ride-hail providers even if national standards are met. Implementation effort is therefore medium, and actual uptake may vary across regions.	Implementation would require NZTA to review provider requirements, accreditation settings, complaints processes, service obligations, and any additional safeguards needed for ride-hail participation. There may also be indirect fiscal costs if lower fares increase demand, which could reduce the cost-stabilising effect of the funding changes already agreed.

Annex 1 Table 2: Proposals not recommended to progress

Proposal	Context and issue	Options and recommendation	Costs, resourcing and implementation implications
Documentary evidence requirements	One option consulted on was requiring all new Total Mobility applicants to provide documentary evidence, such as medical certification, to support eligibility decisions. This was intended to strengthen consistency and confidence in assessment decisions. However, Total Mobility eligibility is fundamentally based on <i>functional</i> transport impairment rather than <i>diagnosis</i> alone. For example, a diagnosis of Parkinson's Disease would not necessarily qualify for Total Mobility, until it functionally affected the ability to use public transport. Consultation feedback also suggested a universal documentary requirement could create barriers for some users by adding cost, particularly for people on low incomes or with limited access to health professionals.	Options are to introduce a universal documentary evidence requirement or retain the current approach to apply documentary requirements only in limited cases. We recommend not progressing a universal requirement. A blanket, national threshold would add cost, delay, and complexity for applicants and administrators, while offering limited likely benefit in improving decision quality. If further consistency is needed, it would be more proportionate to strengthen assessor guidance and operational practice rather than introduce a general evidential threshold.	No direct Crown cost arises from not progressing this proposal. If introduced, costs would likely fall on users, health professionals, assessors, and public transport authorities through additional administrative steps. Any fiscal benefit is likely to be small and uncertain.
Mandatory periodic reassessments	A further proposal was to introduce mandatory reassessments at regular intervals for all users (for example, after 3 or 5 years). This was intended to ensure that eligibility remains current and to improve targeting over time. While reassessment can be appropriate where an impairment is temporary, fluctuating, or expected to improve, most Total Mobility users have lifelong, degenerative, or otherwise long-term impairments. Consultation feedback highlighted concern that a universal reassessment requirement would be burdensome, traumatic and unnecessary for many people, especially for those with greatest need.	Options are to introduce mandatory reassessments for all users or continue with targeted reassessments under current operational settings. We recommend not introducing universal mandatory reassessments. This would be disproportionate to the problem being addressed and would likely deliver only small fare subsidy savings. In contrast it would add substantial cost and workload to current assessors. A more proportionate approach is to continue targeted reassessments where there is a reasonable expectation that a person's transport needs may change over time.	Not progressing this proposal avoids a potentially significant operational burden for assessors, public transport authorities, and users. If introduced universally, reassessments would require additional administrative capacity and could create delays, while likely yielding only limited fiscal benefit.

Proposal	Context and issue	Options and recommendation	Costs, resourcing and implementation implications
Nationally-mandated trip caps	Trip caps would put a clearer upper limit on subsidy exposure across the country, but they would also ration access to a scheme that users rely on for essential travel and to participate in their community. Travel needs vary significantly by impairment, location, income, employment, caring responsibilities, and access to other transport options, so a simple flat cap would be poorly targeted. A more personalised allocation could better reflect need, but would require a new assessment framework, regular reviews, and likely appeal pathways. As trip caps could limit economic and social participation of some disabled people, proceeding with them could be seen as inconsistent with Article 9 and 19 of the UNCRPD, both of which emphasise enabling persons with disabilities to live independently and participate fully in all aspects of life. Consultation feedback indicated strong concern about the equity and practical implications of limiting access to essential travel.	Options are to introduce a universal cap, introduce a more targeted cap, or retain the current uncapped approach. We recommend not progressing nationally-mandated trip caps. Although trip caps could improve budget control, they would move Total Mobility away from a needs-based model and risk limiting essential travel for users with the greatest reliance on the scheme. Previous modelling suggests likely savings would be modest relative to the complexity, administrative effort, and equity trade-offs involved. NZTA estimated that a monthly cap of 40 trips per month would reduce overall trips by 1 percent and the fare subsidy by 1.4 percent; 30 trips per month would reduce 2.3 percent of trips and 2.8 percent of subsidy.	Not progressing nationally-mandated trip caps avoids the need for further system design, policy settings, and administrative processes to define cap levels, exemptions, and appeal pathways. If pursued in future, this would require a clearer framework for assessing and prioritising need.

ANNEX 2: SUMMARY OF THE MAIN THEMES FROM THE TOTAL MOBILITY PUBLIC CONSULTATION

Annex 2 provides an overview of the public consultation on proposals to strengthen Total Mobility, including how it was run, who responded, and high-level feedback themes used to inform our recommendations in Annex 1. Proposals are presented as described in the discussion document. Percentage results indicate the views of survey submitters only.

Overview of the public consultation

The Ministry of Transport consulted on six proposals to strengthen the Total Mobility scheme for users and funders.

- Consultation ran between 16 December 2025 and 22 March 2026. Proposals were outlined in a short discussion document.

The Ministry of Transport led an accessible public consultation

- Consultation material was made available in alternate formats from mid-January 2026 (Easy Read, Braille, New Zealand Sign Language, audio, and large print).
- Several options were available to provide feedback in accessible formats, and online and in-person meetings were adapted to meet accessibility needs.
- The consultation was promoted in multiple forums including the Ministry of Transport website and social media, Office for Seniors newsletter, the Ministry of Disabled People and Office for Seniors social media, and a radio interview on Wellington Access Radio (community radio station).

There was a good level of participation in the public consultation

- A total of 564 submissions were received. Of those, 408 submissions were received via an online survey (also available in alternate formats), 155 submissions were received via email, and one submission was received via post.
- The Ministry of Transport also met with about 200 people between January and March 2026, in-person and online, as follows:
 - two online sessions open to the public. New Zealand Sign Language interpretation was provided at both sessions
 - seven targeted stakeholder meetings with groups and organisations representing disabled people and seniors. These included the Disabled People's Organisations Coalition; tāngata whaikaha Māori; four seniors' advocacy groups; a seniors' disability network group; a Parents, Family and Whānau group (carers and family of disabled people); Association of Blind Citizens of New Zealand; and an in-person session with People First members (learning disabilities)
 - five targeted sessions with current or potential Total Mobility providers and organisations including Driving Miss Daisy, Uber, Waka Eastern Bay, Aspire Canterbury and ESL Limited
 - a joint session with Total Mobility coordinators from each public transport authority.

Feedback was received from a wide range of people who use, provide and fund Total Mobility

- About half of the respondents to the online survey were Total Mobility users and identified as disabled. Of these, respondents identified mainly as New Zealand European, and there was a high proportion of women, and people aged between 30-64 years. There were 28 people who identified as tangata whaikaha Māori. The main impairment types that people reported were physical, learning, cognitive or neurological, and visual. Many people had more than one impairment type.
- The other half of respondents to the online survey were a mix of Total Mobility providers, disability advocacy organisations, industry associations, non-profit organisations, and two central government respondents (Chief Ombudsman and Human Rights Commission).

Summary of main themes from public consultation

Proposal 1: Set a clear purpose statement for Total Mobility

The discussion document proposed this revised purpose statement to clarify why Total Mobility exists and who the scheme is intended to support: “to provide subsidised mobility services to disabled people who are unable to access public transport because of an impairment, to support them to live their lives”

In the survey, **47 percent supported** and **39 percent opposed** the draft purpose statement. Comments revealed that support was often partial or conditional. This was consistent with what we heard in our meetings.

- **Terminology on who Total Mobility is intended to support:** There were mixed views on whether the purpose statement should use the term ‘disabled person’, which aligns with the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), or the term ‘long-term impairments’, which is clearer and more explicit about who Total Mobility is intended to support. Some submitters raised that using ‘disabled person’ may send a signal that excludes people with age-related impairments who may not identify as disabled but still meet the eligibility criteria. The language may also exclude fluctuating impairments.
- **Link to public transport:** Many respondents opposed linking Total Mobility to public transport, citing grounds such as Total Mobility being available in places there is no public transport or arguing that loss of a driver’s licence should be qualifying grounds. Respondents said linking to public transport was limiting as services could be unreliable, infrequent, not always clean, safe, comfortable, or dignified, and cited a lack of network reach. Conversely, many PTAs supported the link with public transport.
- **Supporting daily lives of disabled people:** Respondents said ‘to live their lives’ was too limited and did not reflect the significance of Total Mobility to many users. There were requests to reference ‘daily needs’, ‘community participation’, social engagement, independence and choice.

Proposal 2A: Introducing evidence requirements as part of the assessment process

The discussion document proposed introducing a requirement for all new Total Mobility users to provide evidence of impairment which prevents public transport use.

In the survey, **50 percent supported** and **36 percent opposed** the proposal. This differed from what we heard in our meetings, particularly from the disability community, where there was stronger opposition to the proposal.

- **Trauma of needing to ‘prove’ disability:** Many respondents raised the trauma of “re-proving” permanent disability many times across government services and the stress and instability of having to reapply for support. It was also seen as a move away from the UNCRPD social model of disability to a more medicalised approach.
- **Cost and availability of health professionals:** Respondents said that introducing evidence requirements would add cost to the applicant and a barrier when health professionals were already under pressure. This could be amplified for those with multiple impairments.
- **Less individualised assessments:** The proposal was intended as an additional requirement to the existing eligibility criteria; however, many thought it was meant to replace the existing system – i.e., be the sole determinant of eligibility. This raised concerns that General Practitioners were not well placed to assess eligibility and Total Mobility assessors would be

less able to do personalised assessment. It may also be more challenging for an assessor to decline an applicant that presented medical evidence.

- **Privacy concerns:** Concerns were raised about privacy, specifically who would retain the medical evidence and how would it be protected.

Proposal 2B: Introducing periodic reassessments to keep receiving Total Mobility support

The discussion document proposed introducing a requirement for periodic reassessments of Total Mobility users.

In the survey, **25 percent supported** and **62 percent opposed** the proposal. This is broadly consistent with what we heard in our meetings, particularly from the disability community.

- ***Permanent impairments should not need to be reassessed:*** Like Proposal 2A, respondents reiterated the trauma experienced by some disabled people of re-proving disability, especially if the disability is permanent.
- ***Increased administration and costs to Total Mobility users, assessors and PTAs:*** For Total Mobility users, costs can be direct when there is a fee for the assessment, or indirect, such as extra time, transport to appointments, and potentially missed work; these people are frequently already on fixed or low incomes. For assessor organisations, there would also be a direct cost as the workload would have a step-change. PTAs noted they expected to be funded for this additional requirement.
- ***There was some support for an administrative review:*** Public transport authorities in particular supported ongoing reviews of Total Mobility user details and whether participants are still using the cards, as opposed to a full reassessment of eligibility.
- ***Improvements to public transport accessibility were unlikely to overcome most permanent disabilities:*** many respondents suggested public transport improvements were too slow to overcome most permanent impairments. But if required, Proposal 2B should not apply to permanent conditions.
- ***Compounding impacts on disabled people if implementing both the requirement to provide evidence and periodic reassessments (Proposals 2A and 2B).***

Proposal 3: Introduce caps on trips based on level of need and circumstances

The discussion document proposed introducing caps on the number of trips available to Total Mobility users. The trip caps were proposed to be implemented nationally in two ways: a flat trip cap for all Total Mobility users, or a set number of trips based on a Total Mobility user's circumstances and trip purposes.

In the survey, **15 percent supported** and **76 percent opposed** the introduction of trip caps. This is broadly consistent with what we heard in our meetings, particularly from the disability community.

- ***Nationally-mandated trip caps would undermine community participation, and access to healthcare and other essential services:*** Nationally-mandated trip caps were seen as a regression from Article 9 of the UNCRPD, which includes the obligation to "ensure that disabled people have access on an equal basis inter alia to facilities and services, including transportation". It would also not be on an equal basis with scheduled public transport, which has no caps on trips but is also a subsidised transport service.

- **Major implementation challenges:** major administrative and implementation challenges were raised. The assessment process for trip caps would become more critical, complicated, and litigated. There would need to be a specific review/challenge process and a process to adjust allocations if need changed. Assessors would need substantially more training.
- **Flat caps would entrench existing inequalities:** The Chief Ombudsman noted, “a flat cap on trips would effectively create a “one size fits all approach” to funding. This disregards the broad spectrum of disability experience and the range of ways that disability impacts people and could have a disproportionate impact on those with more complex needs.”

Proposal 4: Incentivise Total Mobility providers to provide more wheelchair accessible vehicle trips

The discussion document proposed more incentives for Total Mobility providers to provide more wheelchair accessible vehicle (WAV) trips.

In the survey, **84 percent supported** incentivising Total Mobility providers to provide more WAV trips. This was consistent with what we heard in our in-person meetings with groups who represent disabled people and seniors. Of the six proposals, this attracted very strong support.

- **Strong support for enabling more WAV trips:** Overwhelmingly, people supported increasing funding for WAVs.

Specific challenges for Total Mobility providers:

- **The cost of modifying or purchasing WAVs is increasingly too expensive for Total Mobility providers:** Respondents shared that it is increasingly not commercially viable to modify or purchase new WAVs. Funding allocations available to Total Mobility providers differ regionally; for example, some PTAs offer a higher grant level than others, which is also a challenge for Total Mobility providers.
- **The current payment of \$10+GST for a WAV trip is not enough of an incentive to provide WAV trips:** There was wide support for increasing the WAV trip payment. The payment has not increased since at least 2005 and has not kept up with inflation. There were specific requests to consider associated costs, including labour and time, training, ongoing maintenance, and the running costs of WAVs.

Proposal 5: Enabling new Total Mobility service providers to enter the scheme

Total Mobility is mainly delivered by taxi companies. The discussion document proposed enabling new Total Mobility service providers to enter the scheme, such as ride-hail, volunteer community transport and on-demand transport.

In the survey, **61 percent supported** enabling new Total Mobility providers to enter the scheme (although this considered ride-hail, on-demand public transport and community transport), 17 percent neither supported nor opposed the proposal, and **19 percent opposed** it. This differed from what we heard in our meetings, particularly from the disability community, where there was stronger opposition to the proposal.

- **Personal safety of Total Mobility users when using ride-hail providers:** Most respondents raised concerns about the personal safety of Total Mobility users, particularly in relation to ride-hail providers. Some respondents raised concerns about reports of poor personal safety and alleged discrimination in other jurisdictions. Respondents stressed that if ride-hail providers were introduced to Total Mobility, they would need to obtain a certain level of training (and maintain it), particularly to support people with higher support needs.

- **Strong support for community transport providers to join Total Mobility, especially in rural communities:** Enabling community transport had support from many respondents. Community transport operates a not-for-profit model and does not have the same incentive as a for-profit provider to provide Total Mobility services. One current Total Mobility community transport provider described the cost and administrative hurdles to provide Total Mobility services as challenging for a not-for-profit organisation.

Proposal 6: Introduce a national public transport concession for people with disabilities

The discussion document proposed introducing a national public transport concession for people with disabilities. This would be separate from Total Mobility services to give people more choice and encourage people to use public transport if that is an option for them.

In the survey, **84 percent supported** and **4 percent opposed** introducing a public transport accessibility concession. All PTAs supported this proposal in their submissions (with the West Coast neutral given there is no public transport there). Of the six proposals, this attracted very strong support.

- **Cost was not the main barrier to using public transport, but a free companion fare could be effective in improving access:** Respondents noted that cost was not the main barrier to people with impairments using public transport independently. Lower or free fares by themselves would therefore not result in much additional use. Enabling a free companion fare to support the primary user was considered vital to make it effective.
- **Regional inconsistency (postcode lottery) would be addressed by a funded national concession:** Currently, public transport accessibility concessions are piecemeal across New Zealand, adding further regional inconsistency in disability support. Several respondents noted that encouraging public transport use where possible supports confidence-building and a sense of participation in mainstream community life.
- **Disabled people faced higher costs across the board, including for transport:** Many disabled people had lower socio-economic status and faced higher costs to access many essential services, including transport. A concession could reduce one portion of this for those who were able to use public transport some or all the time.