



Total Mobility: Public consultation on proposals to strengthen the scheme for users and funders

Summary of submissions – August 2026

The Ministry of Transport* consulted on six proposals to strengthen the Total Mobility scheme for those who use it and those who fund it.

Public consultation ran between 16 December 2025 and 22 March 2026. Consultation started on the same day as Ministers announced changes to Total Mobility's funding settings to stabilise cost pressures.

Consultation proposals were outlined in a discussion document, which identified some of the ways that Total Mobility could be changed to make it fairer and more consistent, more targeted and more innovative.

The proposals were:

- Proposal 1: Set a clear purpose statement for Total Mobility
- Proposal 2: Introduce new requirements to the Total Mobility assessment process
- Proposal 3: Introduce caps on trips based on level of need and circumstances
- Proposal 4: Incentivise Total Mobility providers to provide more wheelchair accessible vehicle trips
- Proposal 5: Enabling new Total Mobility service providers to enter the scheme
- Proposal 6: Introduce a national public transport concession for people with disabilities.

Feedback was gathered through accessible feedback forms, including in alternate formats, email, and online and in-person meetings hosted by the Ministry of Transport.

This document provides a summary of submissions on the proposals. The feedback was used to guide advice to Ministers and the decisions made on which proposals to take forward to strengthen Total Mobility for those who use it, and those who fund it.

The Ministers' announcement outlining decisions on proposals to progress following public consultation can be found on the Beehive website: www.beehive.govt.nz.

The Ministry of Transport would like to thank those who took the time to provide feedback on the proposals. Your knowledge and lived experiences shared through the feedback are appreciated.

* On 1 July 2026, the Ministry of Transport was merged into the Ministry for Cities, Environment, Regions and Transport (MCERT). For simplicity, the Ministry of Transport will be referred to in this document.

Purpose of the consultation

The purpose of the consultation was to gather feedback on proposals aimed at strengthening the long-term sustainability of Total Mobility for users and funders. The consultation followed Ministers' decisions to change Total Mobility's funding settings to help manage immediate cost pressures in the short term.

Approach to the consultation

- A discussion document set out six proposals to strengthen Total Mobility for users and funders. The discussion document can be found at: www.transport.govt.nz/consultations/proposals-to-strengthen-total-mobility.
- The consultation was aimed at Total Mobility users, their caregivers and whānau, public transport authorities (PTAs), and existing and prospective Total Mobility providers.
- The discussion document, or in some cases a summary of the discussion document, was made available in alternate formats on the Ministry of Transport's website from mid-January 2026. Alternate formats of the discussion document included Easy Read, Braille, New Zealand Sign Language (NZSL), audio, and large print.
- Several options were made available to provide feedback in accessible formats, including an Easy Read feedback form via email and an online survey that could be accessed using audio, large print, NZSL and Easy Read.
- Online and in-person meetings were adapted to meet accessibility needs.

Who contributed feedback

- Annex 1 summarises the people and organisations who participated in the consultation.

Approach to analysing the feedback

- Feedback on the proposals was received and considered by the Ministry of Transport over the course of the public consultation.
- At the end of the consultation, the Ministry of Transport identified broad feedback themes for each of the six proposals. The feedback themes were informed by feedback received in the online and in-person meetings, as well as the written feedback from the online survey.
- Feedback themes were identified by the Ministry of Transport team, who were present at the online and in-person meetings and who also read the submissions. Artificial Intelligence was used to complement the analysis of feedback by Ministry staff.

Main feedback themes from public consultation

Feedback shared with the Ministry of Transport on the Total Mobility proposals was constructive and informed. Clear feedback themes emerged through the consultation, with feedback shared in meetings broadly mirroring the feedback received through written submissions.

Percentage results in this summary indicate the views of survey submitters only.

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 was heard in the meetings.

The main themes that emerged from the consultation were:

- **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 said 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 for Total Mobility. The language could also be interpreted as excluding 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 that making a link 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 that prevents public transport use.

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

The main themes that emerged from the consultation were:

- **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 to complement the existing eligibility criteria, not replace them. However, many respondents understood it as a replacement for the current assessment process and were concerned that it would become the sole basis for determining eligibility. This raised concerns that General Practitioners were not necessarily well placed to assess eligibility and Total Mobility assessors would be less able to do a 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 it would be protected.

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

The discussion document proposed introducing a requirement for periodic reassessments of all 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.

The main themes that emerged from the consultation were:

- **Permanent impairments should not need to be reassessed:** Consistent with Proposal 2A, respondents emphasised that people with permanent impairments should not be required to repeatedly prove their disability. Respondents highlighted that reassessment processes can be distressing and retraumatising, particularly when an individual’s

impairment is permanent and unlikely to change over time.

- **Increased administration burdens and costs to Total Mobility users, assessors and PTAs:** Respondents raised concerns that introducing reassessments could increase administrative burden and cost across the system. For Total Mobility users, costs may be direct, such as assessment fees, or indirect, including travel to appointments, time spent completing assessment processes, and potential loss of income from taking time off work. Respondents noted that many Total Mobility users are on fixed or low incomes, meaning these additional costs could create a significant barrier to accessing Total Mobility. There would also be a significant increase in work for assessor organisations. PTAs noted they expected to be funded for this additional requirement.
- **There was some support for an administrative review:** PTAs 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 both evidence requirements and periodic reassessments were implemented:** Respondents were concerned that implementing both proposals 2A and 2B would compound the burden on disabled people.

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. Two options to implement trip caps were proposed: 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 was heard in the meetings, particularly from the disability community.

The main themes that emerged from the consultation were:

- **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 needs 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.

The main themes that emerged from the consultation were:

- **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 reported that it is becoming increasingly difficult for providers to justify the cost of modifying existing vehicles or purchasing new wheelchair-accessible vehicles. They also noted that funding support varies across regions, with some PTAs offering higher grant levels than others. Respondents considered these regional differences an additional challenge, creating inconsistencies in support and affecting the commercial viability of operating WAV services.
 - **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.

The main themes that emerged from the consultation were:

- **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 services offered there). Of the six proposals, this attracted very strong support.

The main themes that emerged from the consultation were:

- **Cost was not the main barrier to using public transport, and 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 experience financial hardship and face higher costs when accessing essential services, including transport. Respondents noted that a concession could help reduce these costs for disabled people who are able to use public transport some or all of the time, making travel more affordable and accessible.



Impact of submissions on the decisions made to strengthen Total Mobility

The submissions received from public consultation informed the final decisions on which Total Mobility proposals to take forward. Specifically:

- **Total Mobility's purpose statement was revised** (Proposal 1) – the purpose statement was revised to refer to both disabled people and long-term impairments, as well as to elaborate on how Total Mobility supports the daily lives of disabled people. These changes reflect respondents' feedback about how the scheme operates and what it supports.

The revised purpose statement is:

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.

- **Nationally mandated assessment requirements and trip cap proposals were not taken further** (Proposals 2A, 2B and 3) – Ministers decided not to take forward the proposals to introduce mandatory documentary evidence for new Total Mobility users, mandatory periodic reassessment for existing Total Mobility users, and nationally mandated trip caps. Feedback on the additional cost and administrative burden, as well as the impact on disabled people, was considered in this decision.
- **Further design work will now be progressed on WAV incentives and a national public transport concession for Total Mobility users, and standards and safeguards for new Total Mobility providers will be reviewed** (Proposals 4, 5 and 6) – supporting more WAVs and a national public transport concession received strong support. Detailed work will commence on these. Enabling a companion fare with the national public transport concession for Total Mobility users will also be considered, as a result of feedback received. Feedback on the safety of Total Mobility users and the enabling of ride-hail will be further considered in the review of standards and safeguards for new Total Mobility providers.

Next steps

The proposals that will be taken further, together with the funding changes on 1 July 2026, will now form a package of improvements designed to strengthen Total Mobility for users and funders. This brings the Total Mobility review to a close.

The Ministry for Cities, Environment, Regions and Transport (MCERT), which is responsible for transport policy, will now work with the NZTA and the Ministry for Disabled People – Whaikaha to implement the agreed package of improvements.



Annex 1: Who responded to the consultation

This annex summarises who provided feedback on the proposals and how that feedback was received.

A range of people and organisations participated in the consultation

Written submissions

- The consultation received 564 written submissions. These included:
 - 408 submissions received via an online survey
 - 155 submissions received via email
 - one submission received via post.
- Submissions were received from Total Mobility users, carers or whānau of Total Mobility users, Total Mobility providers, disability advocacy organisations, industry associations, non-profit organisations, and two government agency respondents (Chief Ombudsman and Human Rights Commission).

Online and in-person meetings

- The Ministry of Transport met with around 200 people between January and March 2026, in-person and online, as follows:
 - **two online sessions open to the public.** One session was held during the day, and one session was held in the evening to enable as many people as possible to attend. New Zealand Sign Language interpretation was provided at both sessions
 - **seven meetings with specific groups and organisations representing disabled people and seniors.** These included the Disabled People's Organisations Coalition; tāngata whaikaha Māori; four seniors' advocacy organisations; a seniors' disability network; 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**
 - **a joint session with Total Mobility coordinators from each PTA.**

Most survey submissions were from Total Mobility users or representatives of Total Mobility users

- Around 72 percent of the overall written feedback was received through the online survey and survey forms emailed to us. The following section summarises information gathered from the survey only. While not representative of all respondents, it provides some understanding of the groups of people who provided feedback and their connection with Total Mobility.

- About half of the respondents to the survey were Total Mobility users (53 percent). About 21 percent identified as a person who helps a Total Mobility user.
- Respondents were asked who they were providing feedback on behalf of (themselves, another person, a group or an organisation). Demographic information was collected for individuals, including ethnicity, gender, age, and impairment type. These questions were optional.
- Of those who responded to demographic questions in the online and emailed surveys:
 - Most were New Zealand European (65%), followed by respondents who left the answer blank (18%), and 'Other' (5.6%).
 - About 7% identified as tāngata whaikaha Māori.
 - Around 55% identified as female, with a high proportion of these women aged between 30 and 64 years old (47%). There was a particularly high proportion of respondents aged 75 years and over who identified as female (9%), when compared with those aged 75 years and over who identified as male (2%).
 - The main impairment types that people reported were physical (48%), learning (25%), cognitive or neurological (25%), visual (16%), and hearing or auditory impairments (11%). Many respondents reported more than one type of impairment.
- About a quarter of the respondents to the online survey identified as mainly living in the Auckland region (24%), followed by respondents who left the answer blank (18%), Wellington (11%), Canterbury (11%), Northland (8%) and Waikato (8%).