This submission is from:

Motor Trade Association (MTA)

The contact person in respect of this submission is:

Name: James McDowall

Title: Head of Advocacy, MTA

Phone: (+64) 021 838 236

Email: James.McDowall@mta.org.nz

Kind regards,

James McDowall

Head of Advocacy

About MTA

The Motor Trade Association (MTA) was founded in 1917 and has maintained over 100 years of trust with the New Zealand motoring community. MTA represents over 4,000 businesses across the automotive sector and its allied services. Our members include general repairers (light and heavy), collision repairers, service stations, vehicle inspectors, and new and used vehicle importers, distributors and dealers. The automotive industry employs over 65,000 New Zealanders and contributes around $6.8 billion to the New Zealand economy.

Submission overview

MTA appreciates the opportunity to provide feedback on NZTA's proposed safety requirements for vehicles entering the New Zealand fleet. We support initiatives that improve road safety and reduce deaths and serious injuries. Our focus in this submission is on settings that are practical, enforceable, and aligned with real-world supply and servicing capability – so the safety benefits are realised in practice, not just on paper.

Summary of MTA's key points

- Support the proposed safety feature requirements for new light vehicles and new heavy vehicles (AEB; lane departure warning / lane support functions as applicable; ESC where applicable; and AVAS for BEVs and hybrids), with lead-in periods that take account of model-cycle and compliance implementation realities.
- We seek to confirm that motorcycles and mopeds are excluded from AEB and lane support requirements (as these systems are not currently practicable for two-wheeled vehicles).
- For used imported light vehicles (including used imported vans within the light-vehicle classes), adopt an accelerated, safety-focused transition that is simple to administer. We are proposing staged reductions over five years to achieve a maximum import age of 10 years by 2030 (with targeted exemptions). This is offered as a practical safety proxy where feature-by-feature verification is difficult and inconsistent. We note that this transition could be implemented with a shorter timeframe.
- For ADAS integrity, avoid relying on border 'presence checks' alone. Build on existing NZTA entry-certification tools (including diagnostic declaration requirements when safety-system warning lamps are present) and strengthen in-service settings so mandated systems remain functional across the life of the vehicle.

- Support public education and implementation mitigations to ensure drivers understand ADAS functions, limitations, and safe use.

Safety features (AEB, lane support functions, ESC, AVAS)

MTA supports the broader direction of strengthening safety feature requirements for vehicles entering the fleet. We do not repeat the technical case for each technology here – instead, we focus on how to set requirements so they are clear, enforceable, and deliver real-world benefit in New Zealand conditions.

New light vehicles

MTA supports the proposed safety requirements for new light vehicles. Most new vehicles supplied to New Zealand already include these technologies, given our reliance on global platforms designed to meet international safety expectations.

Lead-in period: MTA recommends a pragmatic lead-in for new light vehicles. This provides time for regulatory guidance, systems updates, and supply-chain/run-out management for the minority of non-compliant variants. Where NZTA identifies cohorts with genuine compliance constraints (for example, low-volume variants or specialist vehicles), NZTA should retain discretion for time-limited, tightly defined transitional relief.

Motorcycles and mopeds

For clarity, MTA recommends that motorcycles and mopeds are explicitly excluded from any AEB or lane support requirements. Two-wheeled vehicles differ materially from light passenger vehicles, and these systems are not currently practicable for motorcycles or mopeds.

New heavy vehicles and trailers

MTA supports the proposed new safety requirements for heavy vehicles. New heavy vehicles entering New Zealand are generally supplied by manufacturers that already design to global safety standards, so requirements such as AEB and lane departure warning should be feasible with appropriate lead-in and clear definitions.

Trailers under 10 tonnes: If NZTA proposes to apply ESC requirements to trailers, MTA recommends excluding trailers designed and manufactured for payloads under 10 tonnes at this stage. In practice, technology availability and integration on lighter trailers is variable, and immediate application risks disproportionate compliance cost

and supply disruption. NZTA could instead signal future intent, focus first on higher-risk trailer categories and applications, and work with industry on a pathway that reflects technology readiness and measurable safety benefit.

Used imported light vehicles – a safety-focused transition

MTA supports the intent to lift the safety baseline of vehicles entering the fleet. For used imports, the key implementation challenge is that feature-by-feature verification at sourcing and at the border can be inconsistent, particularly for older vehicles and trim-dependent features. If compliance settings are too complex or are set ahead of practical availability, the risk is reduced turnover and unintended fleet-aging effects.

Why an age-based transition is proposed

MTA proposes a simple, enforceable transition for used imported light vehicles: staged reductions over five years to reach a maximum import age of 10 years by 2030 (measured from first overseas registration). This approach acts as a safety proxy: newer vehicles are materially more likely to include modern crash-avoidance and occupant-protection technologies, and the rule is straightforward to administer without relying on non-standardised feature fields.

Why *10 years by 2030*: MTA considers this a balanced endpoint that is ambitious enough to materially shift the safety baseline of vehicles entering the fleet, while remaining more feasible than very tight thresholds that would risk sudden supply contraction and affordability impacts. In our view, this transition could be faster. NZTA should review the endpoint and the staging settings in light of observed supply and price effects and adjust if evidence supports a faster (or slower) pathway.

Possible step-down schedule

- From 1 July 2027: used imports must be no more than 13 years old.
- From 1 July 2028: used imports must be no more than 12 years old.
- From 1 July 2029: used imports must be no more than 11 years old.
- From 1 July 2030: used imports must be no more than 10 years old.

Targeted exemptions

MTA recommends maintaining targeted exemptions for: (a) low-volume classic and enthusiast vehicles; and (b) vehicles imported for disability and mobility use, consistent with existing provisions under the Land Transport Rule: Vehicle Standards Compliance 2002. Exemptions should be narrowly defined, time-limited where appropriate, and

subject to periodic review.

ADAS integrity and practicable compliance settings

Mandating ADAS features only improves safety if systems are maintainable and verifiable throughout the life of the vehicle. Settings should therefore prioritise practicable verification pathways (especially for higher-risk cases) rather than relying on simple 'presence' checks.

What is practical at entry (including at the border)

MTA agrees that a simple dashboard 'tell-tale' presence check is not a reliable proxy for whether ADAS and related safety systems are functioning correctly. However, universal functional testing or calibration of every used import at the border is not practicable. Instead, NZTA can build on existing entry-certification tools to target higher-risk cases without creating an unworkable universal regime.

Use existing diagnostic declaration tools where warning lamps are present: NZTA already requires diagnostic checks and declarations for safety systems (including ADAS) when warning lamps indicate a fault, and this can be used to address vehicles flagged at entry for safety-system faults.

Define higher-risk triggers for additional scrutiny: for example, vehicles identified as repaired/accident-repaired in source-market documentation, or vehicles with evidence of front-end structural repair. Where such triggers exist, NZTA should require stronger evidence of system integrity than a simple presence check.

Allow multiple evidence pathways where appropriate: where feature verification is uncertain, NZTA should use standards-based evidence and recognised safety ratings/equivalency evidence to streamline compliance decisions for common models, while keeping administrative burden proportionate.

In-service integrity: keep the mandate 'real' over time

ADAS integrity risk is elevated where a vehicle has had prior collision repair (including minor front-end impacts), windscreen replacement, bumper removal/replacement, sensor replacement, or work affecting steering/suspension geometry – all of which can disturb camera and radar alignment and may require OEM-specified recalibration.

Strengthen WoF/CoF settings for mandated systems: ensure inspection processes can verify warning lamps are not illuminated and, where feasible, apply diagnostic interrogation for mandated systems consistent with NZTA's existing approach to electronic safety systems.

Calibration and repair standards: endorse minimum standards for ADAS calibration after common disturbance events (windscreen, bumper, collision repair, steering/suspension work) and ensure consumers are informed when calibration is required.

Capability and accreditation: work with industry on training pathways, equipment expectations and an accreditation framework for ADAS calibration providers, to reduce the risk of poor-quality calibration outcomes.

Repair information and maintainability: NZTA should ensure the regulatory settings do not mandate systems that cannot realistically be verified, recalibrated, or repaired in New Zealand over time. Where access to OEM specifications, calibration targets or software is a barrier, NZTA should work with other agencies and industry on practical solutions, so the safety benefit is durable.

Risk-based audit approach

Where NZTA needs stronger assurance than presence checks but universal testing is impractical, a risk-based audit approach is a workable middle ground. This means NZTA (or its delegated agents) targets a small number of higher-risk cohorts for deeper verification, rather than imposing a universal border test.

Target cohorts: repaired/accident-repaired vehicles, vehicles flagged for structural damage and repeat non-compliance patterns among importers or compliance providers.

Audit tools: review of documentation, diagnostic interrogation where available, and follow-up inspection requirements where indicators suggest compromised system integrity.

Feedback loop: use audit results to refine guidance, improve compliance, and calibrate the balance between safety assurance and administrative burden.

Conclusion

MTA supports the objective of materially improving road safety through the adoption of advanced vehicle safety technologies. To succeed, the rule settings must be practical, enforceable, and aligned with supply and servicing realities.

MTA supports the proposed requirements for new light and heavy vehicles, with a pragmatic but firm lead-in for new light vehicles and clear definitions for lane functions and other features. MTA also recommends motorcycles and mopeds be explicitly excluded from AEB and lane support requirements.

For used imported light vehicles, MTA recommends a simple safety-focused transition pathway: staged reductions over five years to reach a maximum import age of 10 years by 2030, with targeted exemptions for low-volume classics and disability/mobility vehicles. As discussed, a more ambitious timeframe should be considered, weighing up feedback from all affected stakeholders.

For ADAS integrity, NZTA should avoid over-reliance on border presence checks. A better approach is to build on existing diagnostic declaration tools at entry, define higher-risk triggers for additional scrutiny, and strengthen in-service settings so mandated systems remain functional and maintainable over the life of the vehicle. This balanced package will lift the safety baseline of vehicles entering the fleet while remaining workable for consumers and industry.