



Consistency Accountability Statement: Land Transport (Driver Licensing) Amendment Rule (No 2) 2026 and Land Transport (Regulatory Fees) Amendment Regulations 2026

Agency responsible	Ministry for Cities, Environment, Regions and Transport
Portfolio	Transport
Date finalised	3 September 2026
Identification number	REG-2258 and REG-2004

Statement of Review

I confirm that the Ministry for Cities, Environment, Regions and Transport has assessed the above legislation, and the process for developing it, for consistency with the principles of responsible regulation as set out in section 9 of the Regulatory Standards Act 2025.

This assessment identified no inconsistencies with the principles of responsible regulation.

s 9(2)(a)



s 9(2)(a)



Ministry for Cities, Environment, Regions and Transport



Summary of Underpinning Analysis: Land Transport (Driver Licensing) Amendment Rule (No 2) 2026 and Land Transport (Regulatory Fees) Amendment Regulations 2026

Agency responsible	Ministry for Cities, Environment, Regions and Transport
Portfolio	Transport
Date finalised	19 August 2026
Identification Number	REG-2258 and REG-2004

Good law-making: 9(i)

The importance of consulting, to the extent that is reasonably practicable, the persons or representatives of the persons that the responsible agency considers will be directly and materially affected by the legislation

Inconsistency identified? NO

Summary of agency analysis

Public consultation on the service modernisation proposals, including enabling digital driver licences, took place from 16 July to 12 August 2026. A total of 14,369 submissions were received.

Submitters provided mixed feedback on the proposals. Some submitters were supportive of the changes and noted expected benefits, such as convenience, ease of use and simpler, more efficient processes. Other submitters noted potential problems, including privacy and security risks and accessibility issues, and were concerned about whether physical driver licences would be retained. A summary of consultation feedback is provided in the Cabinet paper.



For the Heavy Vehicle productivity changes made through this Rule, NZ Transport Agency Waka Kotahi (NZTA) consulted the public in 2019. In late 2025, officials consulted a targeted group of industry stakeholders, which confirmed that views had not materially changed since consultation.

The Graduated Driver Licence System (GDLS) changes reinstate an existing testing fee for renewing a Class 2-6 full licence that has been expired for more than five years. This was removed in error during drafting of the Land Transport (Driver Licensing) Amendment Rule 2026 and reinstatement did not require further consultation.

Good law-making: 9(j)

The importance of carefully evaluating—

- the issue concerned; and
- the effectiveness of any relevant existing legislation and common law; and
- whether the public interest requires that the issue be addressed; and
- any options (including non-legislative options) that are reasonably available for addressing the issue; and
- who is likely to benefit, and who is likely to suffer a detriment, from the legislation

Inconsistency identified?

NO

Summary of agency analysis

The Rule supports implementation of amendments made to the Land Transport Act 1998 through the Regulatory Systems (Transport) Amendment Act 2026. Amendments to secondary legislation are required to establish the detailed regulatory settings necessary to support digital driver licences and modernised driver licensing processes.

Officials considered the detailed settings needed to give effect to the framework established through the Act, including settings relating to driver licence applications, identity verification, temporary licences, theory testing, digital driver licences, and overseas driver licence conversions. Officials also considered the appropriate balance between legislative certainty and operational flexibility.

The amendments are expected to benefit driver licence applicants, driver licence holders, NZ Transport Agency Waka Kotahi, enforcement agencies and businesses that rely on driver licence information. Benefits include expanding access to digital services, reducing administrative burden, improving the efficiency of licensing processes, and supporting the use of digital credentials. Potential risks relating to privacy, security and digital exclusion are mitigated through privacy safeguards, consultation requirements, and the continued availability of physical and in-person service channels.

A regulatory analysis summary was prepared for the rule amendments to enable the digital driver licence rule.



For the Heavy Vehicle Productivity changes, officials carefully considered the existing law and found it was not effective or beneficial to the public interest. The changes better address the issues than other available options would, and are expected to have positive effects without disadvantaging certain groups.

The GDLS changes reinstate an existing testing fee for renewing a Class 2-6 full licence that has been expired for more than five years. This was removed in error during drafting of the Land Transport (Driver Licensing) Amendment Rule 2026. Officials carefully considered reinstating the fees and found that this was necessary to support an efficient testing system.

Good law-making: 9(k)

The importance of the responsible agency identifying and developing effective arrangements for implementing the legislation

Inconsistency identified? NO

Summary of agency analysis

Some service modernisation amendments will have practical effect only when supporting services or operational arrangements are introduced by NZTA. The Rule allows those reforms to be implemented as services become available.

NZTA has developed a plan to implement Heavy Vehicle Productivity changes, including key risks, roles and responsibilities, and resourcing needs.

The GDLS changes ensure that the current system can continue to function efficiently and therefore no implementation actions are required.

Good law-making: 9(l)

Legislation should be expected to produce benefits that exceed the costs of the legislation to the public or persons

Inconsistency identified? NO

Summary of agency analysis

The Regulatory Systems (Transport) Amendment Act 2026 has already provided for digital driver licences to be recognised in law, alongside the physical licence.

The service modernisation amendments are expected to produce benefits for driver licence applicants, driver licence holders, NZ Transport Agency Waka Kotahi, enforcement agencies and businesses that rely on driver licence information. Expected benefits include more flexible service delivery, reduced administrative burden, more efficient licensing processes, and support for digital credentials and other modern service options.



The amendments may result in implementation and system-development costs. There are also potential risks relating to privacy, security and digital exclusion. However, the Rule includes safeguards to support, privacy secure implementation and retains physical and in-person options where appropriate. Officials expect the benefits of the amendments to outweigh the associated costs and risks.

The Heavy Vehicle Productivity amendments are expected to benefit tractor operators and Police by making the rules easier to understand, comply with, and enforce. They will also benefit road users travelling behind tractors by reducing the speed differential. The change to remove the ALP is not expected to have benefits other than removing redundant provisions from the rule. Officials do not expect material costs from either of these changes.

The GDLS changes will benefit the long-term sustainability of the driver testing system and align with the principle that costs should be met by those members of the public that benefit from the activity.

Good law-making: 9(m)

Legislation should be the most effective, efficient, and proportionate response to the issue concerned that is available

Inconsistency identified?

NO

Summary of agency analysis

The service modernisation amendments update the Driver Licensing Rule to support modern service delivery and provide the detailed regulatory settings necessary for the effective operation of the driver licensing system. The amendments retain core legislative requirements while providing flexibility for specified operational and technical matters to be managed through transport instruments when appropriate.

The Rule is proportionate to the issues being addressed. It supports more efficient and flexible service delivery while maintaining safeguards relating to identity verification, privacy, enforcement and accountability. The amendments also retain physical and in-person options where appropriate, ensuring services remain available to people who are unable or unwilling to use digital channels.

Officials also consider that the Heavy Vehicle Productivity amendments are an effective, efficient and proportionate means of ensuring driver licensing services are modern and fit for purpose.

For the GDLS changes, officials consider that the amendments are an effective, efficient and proportionate means of ensuring the costs of the driver testing system can be met in the long-term.



Rule of Law: 9(a)(i)

The law should be clear and accessible

Inconsistency identified? NO

Summary of agency analysis

The Rule will be publicly available through the legislation website. The amendments have been drafted to clearly set out the legislative framework for driver licensing processes and requirements and electronic driver licences.

For Service Modernisation, the Rule enables certain technical and operational requirements relating to identity verification and temporary driver licences to be specified in transport instruments. Transport instruments made under the Rule are secondary legislation and are subject to publication requirements. This helps ensure that applicable requirements remain publicly accessible and can be updated without requiring further amendments to the Rule.

Officials consider that the amendments provide a clear and accessible legislative framework, while ensuring detailed operational requirements can be maintained and updated as needed.

Rule of Law: 9(a)(ii)

The law should not adversely affect rights and liberties, or impose obligations, retrospectively

Inconsistency identified? NO

Summary of agency analysis

The Rule does not impose obligations retrospectively or alter existing rights, liabilities or entitlements with retrospective effect.

Rule of Law: 9(a)(iii)

Every person is equal before the law

Inconsistency identified? NO

Summary of agency analysis

The Rule applies generally to persons who apply for, hold, or are required to produce a driver licence. The amendments apply consistently to all persons within the relevant classes of licence holder or applicant.

The amendments do not create exemptions, immunities or special treatment that would result in the law being administered unequally. Officials do not consider that the amendments could result in the law being applied unequally to the degree that it would be inconsistent with the principle that every person is equal before the law.



Rule of Law: 9(a)(iv)

There should be an independent impartial judiciary

Inconsistency identified? NOT APPLICABLE

Summary of agency analysis

Rule of Law: 9(a)(v)

Issues of legal right and liability should be resolved by the application of law, rather than the exercise of administrative discretion

Inconsistency identified? NO

Summary of agency analysis

The Rule establishes the legal framework governing driver licensing requirements and the circumstances in which specified powers may be exercised by the Director of Land Transport. For Service modernisation, these powers relate primarily to operational and technical matters, including identity-verification requirements, the form and content of temporary driver licences, approvals relating to electronic driver licences, and requests for further information when assessing overseas driver licence conversion applications. For Heavy Vehicle Productivity, they relate to driver licensing processes for heavy vehicles and speed limits for tractors.

The amendments do not transfer the determination of legal rights and liabilities from the law to unrestricted administrative discretion. The powers conferred on the Director are defined and constrained by the Rule and the Land Transport Act 1998. Officials therefore consider that issues of legal right and liability continue to be resolved principally through the application of law rather than the exercise of administrative discretion.

Liberties: 9(b)

Legislation should not unduly diminish a person's liberty, personal security, freedom of choice or action, or rights to own, use, and dispose of property, except as is necessary to provide for, or protect, any such liberty, freedom, or right of another person

Inconsistency identified? NO

Summary of agency analysis



The Service Modernisation amendments support increased use of digital service delivery and digital credentials. This may engage privacy interests because additional personal information may be collected, stored, verified or disclosed through digital processes and identity-verification systems.

Officials consider these impacts are justified and proportionate to the objectives of improving service delivery, strengthening identity verification, and enabling secure digital credentials. The Rule also retains physical and in-person service options, ensuring that people are not required to use digital services if they are unable or unwilling to do so.

NZ Transport Agency Waka Kotahi undertook a Privacy Impact Assessment and engaged with the Office of the Privacy Commissioner during development of the digital driver licence to identify and address privacy risks. Officials do not consider that the amendments unduly diminish personal liberty, freedom of choice or action, personal security, or property rights.

The Heavy Vehicle Productivity amendments do not relate to this principle other than limiting the speed of tractors being driven on the road. This is necessary to ensure a safe transport system for other road users.

The GDLS amendments do not relate to this principle.

Taking of property: 9(c)

Legislation should not take or severely impair, or authorise the taking or severe impairment of, property without the consent of the owner unless-

- **there is a good justification for the taking or severe impairment; and**
- **fair compensation for the taking or severe impairment is provided to the owner; and**
- **the compensation is provided, to the extent practicable, by or on behalf of the persons who obtain the benefit of the taking or severe impairment**

Inconsistency identified?

NOT APPLICABLE

Summary of agency analysis

Taxes, fees and levies: 9(d)

The importance of maintaining consistency with section 22(a) of the Constitution Act 1996 (Parliamentary control of taxation)

Inconsistency identified?

NOT APPLICABLE

Summary of agency analysis



Taxes, fees and levies: 9(e)

Legislation should impose, or authorise the imposition of, a fee for goods or services only if the amount of the fee bears a proper relation to the cost of providing the good or service to which it relates

Inconsistency identified? NO

Summary of agency analysis

The Land Transport (Regulatory Fees) Amendment Regulations 2026 make a consequential amendment to remove the fee associated with the ALP, to reflect that the service is no longer provided.

The GDLS changes reinstate an existing fee for full licence testing. This fee is based on a reasonable recovery for the costs of delivering the test.

Taxes, fees and levies: 9(f)

Legislation should impose, or authorise the imposition of, a levy to fund an objective or a function only if the amount of the levy is reasonable in relation to both—

- the benefits that the class of payers is likely to derive, or the risks attributable to the class, in connection with the objective or function; and
- the costs of efficiently achieving the objective or providing the function

Inconsistency identified? NOT APPLICABLE

Summary of agency analysis

Role of courts: 9(g)

Legislation should preserve the courts' constitutional role of ascertaining the meaning of legislation

Inconsistency identified? NO

Summary of agency analysis

The amendments do not affect the courts' constitutional role of interpreting and applying legislation. The Rule does not restrict the courts' ability to determine the meaning of the Rule, the Land Transport Act 1998, or any transport instrument made under the Rule.

Officials do not consider that the amendments are inconsistent with the principle that legislation should preserve the courts' constitutional role of ascertaining the meaning of legislation.



Role of courts: 9(h)

Legislation should make rights and liberties, or obligations, dependent on administrative power only if the power is sufficiently defined and subject to appropriate review

Inconsistency identified?

NO

Summary of agency analysis

For Service Modernisation, the Rule confers powers on the Director of Land Transport relating to the administration of the driver licensing system. These include powers relating to identity-verification requirements, temporary driver licence requirements, approvals of electronic driver licences and facilitation services, and requests for further information when assessing overseas driver licence conversion applications.

Officials consider these powers are sufficiently defined and constrained. The Rule specifies the matters for which the powers may be exercised and, in some cases, the matters that must be considered before decisions are made. Transport instruments made under the Rule are secondary legislation and are subject to publication requirements.

The amendments do not limit existing rights of review. Decisions made under the Rule remain subject to ordinary administrative law principles and judicial review. Officials therefore consider that rights, liberties and obligations are dependent on administrative powers only where those powers are appropriately defined and subject to appropriate safeguards and review mechanisms.

The Heavy Vehicle Productivity amendments do not relate to this principle.

Relevant international treaties, standards and obligations

The Rule enables the Director of Land Transport to approve electronic driver licences and facilitation services that comply with ISO/IEC 18013-5, the international standard for mobile driving licences. This supports interoperability and alignment with internationally recognised digital credential standards.

Departures from the Legislation Guidelines

Other unusual provisions or features

[IN-CONFIDENCE]



**Ministry for Cities, Environment,
Regions & Transport**

[IN-CONFIDENCE]



Consistency Accountability Statement: Land Transport Rule: Regulatory Systems Amendment 2026

Agency responsible	Ministry for Cities, Environment, Regions and Transport
Portfolio	Transport
Date finalised	19 August 2026
Identification number	

Statement of Review

I confirm that the Ministry for Cities, Environment, Regions and Transport has assessed the above legislation, and the process for developing it, for consistency with the principles of responsible regulation as set out in section 9 of the Regulatory Standards Act 2025.

This assessment identified no inconsistencies with the principles of responsible regulation.

s 9(2)(a)



s 9(2)(a)



Ministry for Cities, Environment, Regions and Transport



Summary of Underpinning Analysis: Land Transport Rule: Regulatory Systems Amendment 2026

Agency responsible	Ministry for Cities, Environment, Regions and Transport
Portfolio	Transport
Date finalised	19 August 2026
Identification Number	

Good law-making: 9(i)

The importance of consulting, to the extent that is reasonably practicable, the persons or representatives of the persons that the responsible agency considers will be directly and materially affected by the legislation

Inconsistency identified? NO

Summary of agency analysis

The amendments are consequential to the Regulatory Systems (Transport) Amendment Act 2026 and give effect to policy changes consulted on during development of that Act. Officials consider that affected persons and organisations had a reasonable opportunity to provide feedback on the matters addressed by these amendments.

Good law-making: 9(j)

The importance of carefully evaluating—

- the issue concerned; and
- the effectiveness of any relevant existing legislation and common law; and
- whether the public interest requires that the issue be addressed; and
- any options (including non-legislative options) that are reasonably available for addressing the issue; and
- who is likely to benefit, and who is likely to suffer a detriment, from the legislation

Inconsistency identified? NO

Summary of agency analysis

The amendments are consequential to the Regulatory Systems (Transport) Amendment Act 2026 and make the changes necessary to align existing land transport rules with the Act.



The amendments support the use of electronic addresses and electronic communications where these are available.

The amendments are limited in scope and are primarily administrative in nature. Benefits include more efficient communication and service delivery for regulated persons and NZ Transport Agency Waka Kotahi. Any additional obligations are limited, as electronic addresses are generally only required where a person has one.

Good law-making: 9(k)

The importance of the responsible agency identifying and developing effective arrangements for implementing the legislation

Inconsistency identified? NO

Summary of agency analysis

The amendments are administrative in nature and can be implemented through existing operational processes. No significant implementation issues are expected to arise from the amendments.

Good law-making: 9(l)

Legislation should be expected to produce benefits that exceed the costs of the legislation to the public or persons

Inconsistency identified? NO

Summary of agency analysis

The amendments are expected to improve administrative efficiency by supporting the use of electronic communications and electronic addresses. Benefits include more efficient communication and reduced administrative burden for regulated persons and NZ Transport Agency Waka Kotahi. Any additional costs associated with the amendments are expected to be minor. The benefits of the amendments are therefore expected to outweigh any associated costs.

Good law-making: 9(m)

Legislation should be the most effective, efficient, and proportionate response to the issue concerned that is available

Inconsistency identified? NO

Summary of agency analysis

The amendments are limited to changes necessary to support electronic communications and related administrative processes. They are expected to improve



efficiency while imposing only minor additional obligations. The amendments are therefore considered to be effective, efficient and proportionate.

Rule of Law: 9(a)(i)

The law should be clear and accessible

Inconsistency identified? NO

Summary of agency analysis

The amendments have been drafted to clearly set out requirements relating to electronic addresses and electronic communications in the relevant land transport Rules. The Ministry considers the amendments are clear and accessible.

Rule of Law: 9(a)(ii)

The law should not adversely affect rights and liberties, or impose obligations, retrospectively

Inconsistency identified? NO

Summary of agency analysis

The amendments do not impose obligations retrospectively or alter existing rights, liabilities or entitlements with retrospective effect.

Rule of Law: 9(a)(iii)

Every person is equal before the law

Inconsistency identified? NO

Summary of agency analysis

The amendments apply consistently to all persons affected by the amended Rules.

Rule of Law: 9(a)(iv)

There should be an independent impartial judiciary

Inconsistency identified? NO

Summary of agency analysis

The amendments do not affect the role, independence or impartiality of the judiciary.



Rule of Law: 9(a)(v)

Issues of legal right and liability should be resolved by the application of law, rather than the exercise of administrative discretion

Inconsistency identified? NO

Summary of agency analysis

The amendments do not confer significant new discretionary powers and do not alter the manner in which legal rights and liabilities are determined.

Liberties: 9(b)

Legislation should not unduly diminish a person's liberty, personal security, freedom of choice or action, or rights to own, use, and dispose of property, except as is necessary to provide for, or protect, any such liberty, freedom, or right of another person

Inconsistency identified? NO

Summary of agency analysis

The amendments support the use of electronic addresses for administrative purposes and generally require an electronic address only where a person has one. The amendments do not unduly diminish personal liberty, freedom of choice or action.

Taking of property: 9(c)

Legislation should not take or severely impair, or authorise the taking or severe impairment of, property without the consent of the owner unless-

- **there is a good justification for the taking or severe impairment; and**
- **fair compensation for the taking or severe impairment is provided to the owner; and**
- **the compensation is provided, to the extent practicable, by or on behalf of the persons who obtain the benefit of the taking or severe impairment**

Inconsistency identified? NOT APPLICABLE

Summary of agency analysis

Taxes, fees and levies: 9(d)

The importance of maintaining consistency with section 22(a) of the Constitution Act 1996 (Parliamentary control of taxation)

Inconsistency identified? NOT APPLICABLE



Summary of agency analysis

Taxes, fees and levies: 9(e)

Legislation should impose, or authorise the imposition of, a fee for goods or services only if the amount of the fee bears a proper relation to the cost of providing the good or service to which it relates

Inconsistency identified? NOT APPLICABLE

Summary of agency analysis

Taxes, fees and levies: 9(f)

Legislation should impose, or authorise the imposition of, a levy to fund an objective or a function only if the amount of the levy is reasonable in relation to both—

- the benefits that the class of payers is likely to derive, or the risks attributable to the class, in connection with the objective or function; and
- the costs of efficiently achieving the objective or providing the function

Inconsistency identified? NOT APPLICABLE

Summary of agency analysis

Role of courts: 9(g)

Legislation should preserve the courts' constitutional role of ascertaining the meaning of legislation

Inconsistency identified? NO

Summary of agency analysis

The amendments do not affect the courts' constitutional role of interpreting and applying legislation.

Role of courts: 9(h)

Legislation should make rights and liberties, or obligations, dependent on administrative power only if the power is sufficiently defined and subject to appropriate review

Inconsistency identified? NO



Summary of agency analysis

The amendments do not confer significant new administrative powers. They primarily update existing information and notification requirements to support the use of electronic addresses and electronic communications. The Ministry considers the amendments are consistent with this principle.

Relevant international treaties, standards and obligations

Departures from the Legislation Guidelines

Other unusual provisions or features



Consistency Accountability Statement: Land Transport (Motor Vehicle Registration and Licensing) Amendment Regulations 2026 and Land Transport (Road User) Amendment Rule (No 2) 2026

Agency responsible	Ministry for Cities, Environment, Regions and Transport
Portfolio	Transport
Date finalised	19 August 2026
Identification number	REG-2258

Statement of Review

I confirm that the Ministry for Cities, Environment, Regions and Transport has assessed the above legislation, and the process for developing it, for consistency with the principles of responsible regulation as set out in section 9 of the Regulatory Standards Act 2025.

This assessment identified no inconsistencies with the principles of responsible regulation.

s 9(2)(a)

s 9(2)(a)

Ministry for Cities, Environment, Regions and Transport



Summary of Underpinning Analysis: Land Transport (Motor Vehicle Registration and Licensing) Amendment Regulations 2026 and Land Transport (Road User) Amendment Rule (No 2) 2026

Agency responsible	Ministry for Cities, Environment, Regions and Transport
Portfolio	Transport
Date finalised	19 August 2026
Identification Number	REG-2258

Good law-making: 9(i)

The importance of consulting, to the extent that is reasonably practicable, the persons or representatives of the persons that the responsible agency considers will be directly and materially affected by the legislation

Inconsistency identified? NO

Summary of agency analysis

Public consultation on the service modernisation proposals, including enabling electronic alternatives to physical licences and labels, took place from 16 July to 12 August 2026. A total of 14,369 submissions were received.

Submitters provided mixed feedback on the proposals. Some submitters were supportive of the changes and noted expected benefits, such as convenience, ease of use and simpler, more efficient processes. Other submitters noted potential problems, including privacy and security risks and accessibility issues, and were concerned about whether physical driver licences would be retained. A summary of consultation feedback is provided in the Cabinet paper.

Good law-making: 9(j)

The importance of carefully evaluating—



- the issue concerned; and
- the effectiveness of any relevant existing legislation and common law; and
- whether the public interest requires that the issue be addressed; and
- any options (including non-legislative options) that are reasonably available for addressing the issue; and
- who is likely to benefit, and who is likely to suffer a detriment, from the legislation

Inconsistency identified?

NO

Summary of agency analysis

The amendments are required to give effect to amendments made by the Regulatory Systems (Transport) Amendment Act 2026 relating to electronic alternatives to physical licences and labels. Additional amendments to secondary legislation are required to operationalise those changes and update existing provisions that rely on physical display requirements. This includes a consequential amendment to the Land Transport (Road User) Rule to remove references requiring evidence of licensing to be "affixed to the vehicle", aligning the Rule with amendments to the Land Transport (Motor Vehicle Registration and Licensing) Regulations that enable electronic confirmation of vehicle licensing. The amendments are expected to improve the efficiency of licensing, inspection and enforcement processes while reducing compliance and administrative burden.

Good law-making: 9(k)**The importance of the responsible agency identifying and developing effective arrangements for implementing the legislation**

Inconsistency identified?

NO

Summary of agency analysis

The amendments support implementation of electronic alternatives to physical licences and labels. Implementation will require operational and system changes by NZ Transport Agency Waka Kotahi and other parties responsible for administering, verifying or enforcing the affected requirements. The amendments are intended to commence on 1 March 2027.

Good law-making: 9(l)**Legislation should be expected to produce benefits that exceed the costs of the legislation to the public or persons**

Inconsistency identified?

NO

Summary of agency analysis

The amendments are expected to produce benefits by supporting electronic alternatives to physical licences and labels, reducing compliance costs, and reducing administrative burden. The amendments also support more efficient inspection and enforcement



processes. The Ministry considers the benefits of the amendments outweigh the associated costs.

Good law-making: 9(m)

Legislation should be the most effective, efficient, and proportionate response to the issue concerned that is available

Inconsistency identified? NO

Summary of agency analysis

The amendments are limited to changes necessary to support electronic alternatives to physical licences and labels and to update related provisions. The amendments are targeted in scope and are intended to reduce compliance costs and administrative burden while supporting implementation of the new licensing and compliance arrangements. The Ministry considers the amendments to be an effective, efficient and proportionate response.

Rule of Law: 9(a)(i)

The law should be clear and accessible

Inconsistency identified? NO

Summary of agency analysis

The amendments update existing provisions relating to licensing and compliance requirements to reflect electronic alternatives to physical licences and labels. The Ministry considers that the amendments are clear and accessible.

Rule of Law: 9(a)(ii)

The law should not adversely affect rights and liberties, or impose obligations, retrospectively

Inconsistency identified? NO

Summary of agency analysis

The amendments do not impose obligations retrospectively or alter existing rights, liabilities or entitlements with retrospective effect. The amendments apply prospectively from their commencement date.

Rule of Law: 9(a)(iii)

Every person is equal before the law



Inconsistency identified? NO

Summary of agency analysis

The amendments apply consistently to all persons affected by the amended legislation.

Rule of Law: 9(a)(iv)

There should be an independent impartial judiciary

Inconsistency identified? NO

Summary of agency analysis

The amendments do not affect the role, independence or impartiality of the judiciary.

Rule of Law: 9(a)(v)

Issues of legal right and liability should be resolved by the application of law, rather than the exercise of administrative discretion

Inconsistency identified? NO

Summary of agency analysis

The amendments do not confer significant new discretionary powers. Issues of legal right and liability continue to be determined by the application of law.

Liberties: 9(b)

Legislation should not unduly diminish a person's liberty, personal security, freedom of choice or action, or rights to own, use, and dispose of property, except as is necessary to provide for, or protect, any such liberty, freedom, or right of another person

Inconsistency identified? NO

Summary of agency analysis

The amendments do not unduly diminish a person's liberty, personal security, freedom of choice or action, or property rights.



Taking of property: 9(c)

Legislation should not take or severely impair, or authorise the taking or severe impairment of, property without the consent of the owner unless-

- there is a good justification for the taking or severe impairment; and
- fair compensation for the taking or severe impairment is provided to the owner; and
- the compensation is provided, to the extent practicable, by or on behalf of the persons who obtain the benefit of the taking or severe impairment

Inconsistency identified?

NOT APPLICABLE

Summary of agency analysis

Taxes, fees and levies: 9(d)

The importance of maintaining consistency with section 22(a) of the Constitution Act 1996 (Parliamentary control of taxation)

Inconsistency identified?

NOT APPLICABLE

Summary of agency analysis

Taxes, fees and levies: 9(e)

Legislation should impose, or authorise the imposition of, a fee for goods or services only if the amount of the fee bears a proper relation to the cost of providing the good or service to which it relates

Inconsistency identified?

NOT APPLICABLE

Summary of agency analysis

Taxes, fees and levies: 9(f)

Legislation should impose, or authorise the imposition of, a levy to fund an objective or a function only if the amount of the levy is reasonable in relation to both—

- the benefits that the class of payers is likely to derive, or the risks attributable to the class, in connection with the objective or function; and
- the costs of efficiently achieving the objective or providing the function

Inconsistency identified?

NOT APPLICABLE



Summary of agency analysis

Role of courts: 9(g)

Legislation should preserve the courts' constitutional role of ascertaining the meaning of legislation

Inconsistency identified? NO

Summary of agency analysis

The amendments do not affect the courts' constitutional role of interpreting and applying legislation.

Role of courts: 9(h)

Legislation should make rights and liberties, or obligations, dependent on administrative power only if the power is sufficiently defined and subject to appropriate review

Inconsistency identified? NO

Summary of agency analysis

The amendments do not confer significant new administrative powers. The Ministry considers the amendments are consistent with this principle.

Relevant international treaties, standards and obligations

Departures from the Legislation Guidelines

Other unusual provisions or features



Consistency Accountability Statement: Land Transport Rule: Vehicle Standards Compliance Amendment (No 2)

Agency responsible

Ministry for Cities, Environment, Regions and Transport

Portfolio

Transport

Date finalised

19 August 2026

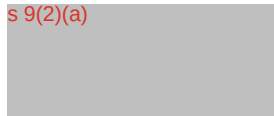
Identification number

Statement of Review

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This assessment identified no inconsistencies with the principles of responsible regulation.

s 9(2)(a)



s 9(2)(a)



Ministry for Cities, Environment, Regions and Transport



Summary of Underpinning Analysis: Land Transport Rule: Vehicle Standards Compliance Amendment (No 2)

Agency responsible	Ministry for Cities, Environment, Regions and Transport
Portfolio	Transport
Date finalised	19 August 2026
Identification Number	

Good law-making: 9(i)

The importance of consulting, to the extent that is reasonably practicable, the persons or representatives of the persons that the responsible agency considers will be directly and materially affected by the legislation

Inconsistency identified? NO

Summary of agency analysis

Public consultation on the service modernisation proposals, including enabling electronic alternatives to physical licences and labels, took place from 16 July to 12 August 2026. A total of 14,369 submissions were received.

Submitters provided mixed feedback on the proposals. Some submitters were supportive of the changes and noted expected benefits, such as convenience, ease of use and simpler, more efficient processes. Other submitters noted potential problems, including privacy and security risks and accessibility issues, and were concerned about whether physical driver licences would be retained. A summary of consultation feedback is provided in the Cabinet paper.

Good law-making: 9(j)

The importance of carefully evaluating—

- the issue concerned; and
- the effectiveness of any relevant existing legislation and common law; and
- whether the public interest requires that the issue be addressed; and
- any options (including non-legislative options) that are reasonably available for addressing the issue; and
- who is likely to benefit, and who is likely to suffer a detriment, from the legislation


Inconsistency identified?

NO

Summary of agency analysis

The amendments are required to give effect to amendments made to the Land Transport Act 1998 by the Regulatory Systems (Transport) Amendment Act 2026 relating to electronic alternatives to physical licences and labels. Additional amendments to secondary legislation are required to operationalise those changes and update existing provisions that rely on physical display requirements. The amendments are expected to improve the efficiency of inspection and enforcement processes while reducing compliance and administrative burden.

Good law-making: 9(k)
The importance of the responsible agency identifying and developing effective arrangements for implementing the legislation
Inconsistency identified?

NO

Summary of agency analysis

The amendments support implementation of electronic alternatives to the display of physical licences and labels. Implementation will require operational and system changes by NZ Transport Agency Waka Kotahi and other parties responsible for administering, verifying or enforcing the affected requirements. The amendments are intended to commence on 1 July 2027.

Good law-making: 9(l)
Legislation should be expected to produce benefits that exceed the costs of the legislation to the public or persons
Inconsistency identified?

NO

Summary of agency analysis

The amendments are expected to produce benefits by supporting electronic alternatives to the display of physical licences and labels, reducing compliance costs, and reducing administrative burden. The Ministry considers the benefits of the amendments outweigh the associated costs.



Good law-making: 9(m)

Legislation should be the most effective, efficient, and proportionate response to the issue concerned that is available

Inconsistency identified? NO

Summary of agency analysis

The amendments are limited to changes necessary to support electronic alternatives to the display of physical licences and labels and to update related provisions. The amendments are targeted in scope and are intended to reduce compliance costs and administrative burden. The Ministry considers the amendments are an effective, efficient and proportionate response.

Rule of Law: 9(a)(i)

The law should be clear and accessible

Inconsistency identified? NO

Summary of agency analysis

The amendments update existing provisions relating to licensing and compliance requirements to reflect the availability of electronic alternatives to the display of physical licences and labels. The Ministry considers the amendments are clear and accessible.

Rule of Law: 9(a)(ii)

The law should not adversely affect rights and liberties, or impose obligations, retrospectively

Inconsistency identified? NO

Summary of agency analysis

The amendments do not impose obligations retrospectively or alter existing rights, liabilities or entitlements with retrospective effect. The amendments apply prospectively from their commencement date.

Rule of Law: 9(a)(iii)

Every person is equal before the law

Inconsistency identified? NO

Summary of agency analysis



The amendments apply consistently to all persons affected by the amended legislation.

Rule of Law: 9(a)(iv)

There should be an independent impartial judiciary

Inconsistency identified? NO

Summary of agency analysis

The amendments do not affect the role, independence or impartiality of the judiciary.

Rule of Law: 9(a)(v)

Issues of legal right and liability should be resolved by the application of law, rather than the exercise of administrative discretion

Inconsistency identified? NO

Summary of agency analysis

Liberties: 9(b)

Legislation should not unduly diminish a person's liberty, personal security, freedom of choice or action, or rights to own, use, and dispose of property, except as is necessary to provide for, or protect, any such liberty, freedom, or right of another person

Inconsistency identified? NO

Summary of agency analysis

The amendments do not unduly diminish a person's liberty, personal security, freedom of choice or action, or property rights.

Taking of property: 9(c)

Legislation should not take or severely impair, or authorise the taking or severe impairment of, property without the consent of the owner unless-

- **there is a good justification for the taking or severe impairment; and**
- **fair compensation for the taking or severe impairment is provided to the owner; and**
- **the compensation is provided, to the extent practicable, by or on behalf of the persons who obtain the benefit of the taking or severe impairment**



Inconsistency identified? NOT APPLICABLE

Summary of agency analysis

Taxes, fees and levies: 9(d)

The importance of maintaining consistency with section 22(a) of the Constitution Act 1996 (Parliamentary control of taxation)

Inconsistency identified? NOT APPLICABLE

Summary of agency analysis

Taxes, fees and levies: 9(e)

Legislation should impose, or authorise the imposition of, a fee for goods or services only if the amount of the fee bears a proper relation to the cost of providing the good or service to which it relates

Inconsistency identified? NOT APPLICABLE

Summary of agency analysis

Taxes, fees and levies: 9(f)

Legislation should impose, or authorise the imposition of, a levy to fund an objective or a function only if the amount of the levy is reasonable in relation to both—

- the benefits that the class of payers is likely to derive, or the risks attributable to the class, in connection with the objective or function; and
- the costs of efficiently achieving the objective or providing the function

Inconsistency identified? NOT APPLICABLE

Summary of agency analysis

Role of courts: 9(g)

Legislation should preserve the courts' constitutional role of ascertaining the meaning of legislation

Inconsistency identified? NO



Summary of agency analysis

The amendments do not affect the courts' constitutional role of interpreting and applying legislation.

Role of courts: 9(h)

Legislation should make rights and liberties, or obligations, dependent on administrative power only if the power is sufficiently defined and subject to appropriate review

Inconsistency identified?

NO

Summary of agency analysis

The amendments do not confer significant new administrative powers. The Ministry considers the amendments are consistent with this principle.

Relevant international treaties, standards and obligations

Departures from the Legislation Guidelines

Other unusual provisions or features