



Consistency Accountability Statement: Land Transport Rule Vehicle Standard Compliance Amendment (No.3) 2026

Agency responsible	Ministry for Cities, Environment, Regions and Transport
Portfolio	Transport
Date finalised	16 September 2026
Identification number	REG-1932

Statement of Review

I confirm that Ministries 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 Vehicle Standards Compliance Amendment (No.3) 2026

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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 substantive policy on Advanced Driver Assistance Systems (ADAS) underlying the Land Transport Rule: Vehicle Standards Compliance Amendment 2026 (the VSC Amendment Rule) was informed by public consultation that ran from October 2025 to December 2025. A total of 5,215 submissions were received with 69% expressing broad support for the package of reforms. Two Regulatory Impact Statements (RIS) were prepared for the Amendment Rule, both outlining public consultation.

The proposed amendment is a minor technical correction identified by the New Zealand Transport Agency (NZTA), which uses the term “light vehicles” in the relevant clause so that the VSC Amendment Rule expressly limits the application of ADAS provisions to light vehicles. This is consistent with Cabinet's April 2026 policy decision [CAB-26-MIN-0148 refers]. It does not change the substance of the policy that was previously consulted on.

In 2025, NZTA consulted publicly on 41 minor and technical rule change proposals under the Regulatory Systems Rule Amendment 2025 and received 75 submissions. NZTA carried out follow-up targeted engagement with experts and industry, with minor changes suggested and incorporated. The summary of submissions can be found here: <https://www.nzta.govt.nz/assets/resources/rules/docs/regulatory-systems-rule-amendment-2025-summary-of-submissions.pdf>.

The policy to standardise speed limits for special-type vehicles to 40km/h align with those for agricultural vehicles was originally consulted on in 2019 and received majority support,



but was not progressed prior to the 2020 general election. This has now been progressed through the Land Transport Rules Reform programme. Officials undertook targeted engagement with industry to ensure that views had not changed since then. A link to the final RIS is included in the Phase Two heavy vehicle productivity RIS.

A two-week shortened consultation was carried out on these proposals as required by section 161(2) of the Land Transport Act 1998 from 31 August to 14 September 2026. We consider this justified given that consultation on the substantive policy has already been carried out. No submissions were received during those two weeks.

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 problem, options and evidence underpinning the Warrant of Fitness (WoF)/Certificate of Fitness A (CoF A) inspection frequency and scope changes were evaluated through the Land Transport Rules Reform Programme, including two RISs and public consultation (see <https://www.transport.govt.nz/assets/Uploads/RIA/Regulatory-Impact-Statement-Review-of-Warrant-of-Fitness-and-Certificate-of-Fitness-A-requirements-for-light-vehicles.pdf>). If the amendment was not made, there would be a risk that the VSC Amendment Rule as currently drafted could be interpreted as also applying heavy vehicles. There were no non-legislative options available. While NZTA could issue guidance on the VSC Amendment Rule clarifying that it only applies to light vehicles, we consider that updating the VSC Amendment Rule to reflect the policy intent is the most straightforward way to ensure that the policy proposals are implemented correctly. The benefits and detriment are considered in the previous RIS, see here: <https://www.transport.govt.nz/assets/Uploads/Interim-Regulatory-Impact-Statement-Review-of-Warrant-of-Fitness-and-Certificate-of-Fitness-A-requirements-for-light-vehicles.pdf>

The proposed update to the Land Transport Rule Vehicle Standards Compliance Amendment (No.3) 2026 (Amendment Rule) does not reflect a new policy decision. It is a technical drafting correction that ensures the VSC Amendment Rule accurately reflects the scope Cabinet already agreed to (ADAS checks applying to light vehicles only). As drafted, the VSC Amendment Rule is not fully effective in meeting the policy intent.



The rule change proposals under the Regulatory Systems Rule Amendment 2025 were exempt from the requirement to provide a RIS, on the grounds of being minor or technical changes. NZTA carried out analysis to assess the problems with existing legislation, possible solutions and the expected costs and benefits of each proposed change. Given the minor nature of this proposal, the analysis is relatively limited but is sufficient to assess the principles under section 9(j).

The proposed Amendment Rule does not reflect new policy decisions. The Regulatory System Rule Amendment 2025 change is technical, reinstating the needed emergency services exemptions, which was unintentionally removed as part of this change.

The Amendment Rule makes a consequential amendment to prevent non-agricultural tractor operators from being required to obtain a WoF to drive at the new speed limit of 40km/h. The link to the RIS is included in Phase Two heavy vehicle productivity final policy decisions (see <https://www.transport.govt.nz/assets/Uploads/Final-Decisions-on-Heavy-Vehicle-Productivity.pdf>).

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

Implementation arrangements for the VSC Amendment Rule, including NZTA's phased rollout, inspector training, and public communications, have already been developed and are unaffected by this technical correction (see <https://www.transport.govt.nz/assets/Uploads/Briefing-Final-Land-Transport-Rule-Vehicle-Standards-Compliance-Amendment-2026.pdf>).

The scope clarification can be made through a minor drafting amendment ahead of the VSC Amendment Rule's commencement on 1 November 2026, without requiring any change to planned implementation arrangements, resourcing, or timing.

Given that the rule changes fulfil previous policy decisions from other work, the implementation of the rules will be managed through NZTA's existing Rules Reform workstreams. This Rule change will already be streamlined with current industry practices.

Subject to Ministerial approval, the Ministry anticipates that the final Rule amendments will be signed by the Minister and notified in the *Gazette* in September 2026, and will come into force on 30 October 2026, whereas the rule amendment regarding ADAS will come into force on 1 November 2026.



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 expected costs and benefits of the WoF/CoF A changes are expected to deliver net benefits of between \$2.6 billion and \$4.1 billion over 30 years through reduced inspection fees, less time spent on compliance, and fewer unnecessary repairs (see <https://www.transport.govt.nz/assets/Uploads/RIA/Regulatory-Impact-Statement-Review-of-Warrant-of-Fitness-and-Certificate-of-Fitness-A-requirements-for-light-vehicles.pdf>). This amendment does not alter that cost-benefit assessment.

The Regulatory System Rule Amendment 2025 is expected to encourage economic development by clarifying the Rules and simplifying legislation and, in turn, reducing compliance and enforcement costs. Reinstating a class of vehicles to existing exemptions is technical but will not be expected to increase compliance or enforcement costs.

Standardising speed limits for special-type vehicles is expected to make land transport rules easier to understand, comply with, and enforce. It also reduces the speed differential between faster-moving traffic on rural roads, which could improve road safety and travel times. Any increases to road wear from the increased speed of these vehicles is expected to be negligible due to their still relatively low speed and small cohort size.

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

Drafting corrections to align the VSC Amendment Rule with Cabinet's agreed policy scope is the most effective, efficient and proportionate way to address the identified drafting gaps. It avoids the uncertainty of leaving an unintended scope ambiguity in place. In the case of non-agricultural tractors, it ensures that benefits from the change will be realized. Drafting corrections through a rule change process was chosen to ensure that all these minor issues picked up by NZTA were more efficiently dealt with at once. Using the Ministerial rulemaking process takes away burden from Cabinet and is proportionate to the significance of the issues.

In the case of the unintended removal exemptions for modified emergency vehicles, rule changes were exempt from the requirement to provide a RIS because they are only minor or technical changes. The proposed rule change to reinstate these exemptions was assessed



via expert assessments by NZTA. This is the most effective, efficient and proportionate way to address this change.

Rule of Law: 9(a)(i)

The law should be clear and accessible

Inconsistency identified? NO

Summary of agency analysis

As currently drafted, the VSC Amendment Rule does not expressly limit the application of Advanced Driver Assistance Systems (ADAS) provisions to light vehicles. This creates a risk that the clause could be read more broadly than Cabinet intended when it agreed, on 7 April 2026, to expand WoF and CoF A inspection scope for light vehicles only [CAB-26-MIN-0148 refers].

As the Regulatory System Rule Amendment 2025 is drafted, it is meant to clarify that specialist certification requirements still apply to both light and heavy vehicles even where an in-service certification is mistakenly issued. During the rule change process, this was unintentionally removed through the current wording in the clause. The proposed amendment is technical, adding back a class of vehicles to existing exemptions within the VSC Rule will align the rule with the policy intent which makes the law clearer.

Once the Amendment Rule has been signed, it will be accessible on NZTA's website. The Amendment Rule has been drafted so that it is clear to the public and the New Zealand Legislation website. The Amendment Rule will also remove ambiguity and improve the clarity and accessibility of the VSC Amendment Rule.

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 VSC Amendment Rule does not impose any obligations retrospectively.

Rule of Law: 9(a)(iii)

Every person is equal before the law

Inconsistency identified? NO

Summary of agency analysis



The Amendment Rule binds the Crown and applies to all people equally. The Crown has no immunity or limitations on civil liability. The Crown has no immunity from criminal liability under this Amendment Rule.

Rule of Law: 9(a)(iv)

There should be an independent impartial judiciary

Inconsistency identified? NO

Summary of agency analysis

The Amendment Rule does not affect or change the impartiality of the judiciary. The Amendment Rule does not increase executive or legislative influence on the judiciary. The Amendment Rule does not delegate binding rulings that a court cannot review.

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 Amendment Rule does not confer any new administrative discretion. It clarifies the class of vehicles to which existing ADAS inspection criteria apply and does not affect how any decision-maker resolves questions of legal right or liability

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 Amendment Rule narrows, rather than widens, the class of vehicles subject to ADAS inspection requirements, by confirming that these requirements apply only to light vehicles as Cabinet intended.

Reinstating existing exemptions within the VSC Rule for modified emergency vehicles does not diminish liberty. The amendment to non-agricultural tractors change narrows the class of vehicles subject to WoF requirements, as it prevents non-agricultural tractors from being required to obtain a WoF to drive at the new speed limit of 40km/h.



Overall, these changes do not significantly alter a person's liberty, as they are largely minor or technical.

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? NO

Summary of agency analysis

The amendments do not take or impair any person's property.

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? NO

Summary of agency analysis

The amendments do not impose or authorise the imposition of any charge.

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 amendment do not affect fees.

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? NO

Summary of agency analysis

The amendment does not impose or authorise any levy.

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' role in interpreting legislation, and does not create or amend any binding determination, review, or appeal mechanism.

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? [YES/NO/NOT APPLICABLE]

Summary of agency analysis

The amendments do not create or amend any administrative power affecting rights, liberties or obligations. It clarifies the scope of vehicles to which an existing inspection requirement applies.

Additional information

Relevant publicly available inquiry, review, or evaluation reports

Regulatory Impact Statement:

<https://www.transport.govt.nz/assets/Uploads/RIA/Regulatory-Impact-Statement-Review-of-Warrant-of-Fitness-and-Certificate-of-Fitness-A-requirements-for-light-vehicles.pdf>

Regulatory Impact Statement:

<https://www.transport.govt.nz/assets/Uploads/RIA/Regulatory-Impact-Statement-Increased-penalties-for-Warrant-of-Fitness-non-compliance.pdf>

Section 164 Land Transport Act Analysis:

<https://www.transport.govt.nz/assets/Uploads/Briefing-Final-Land-Transport-Rule-Vehicle-Standards-Compliance-Amendment-2026.pdf>



Final LEG Cabinet paper: <https://www.transport.govt.nz/assets/Uploads/LEG-Cabinet-paper-Land-Transport-Rule-Vehicle-Standards-Compliance-Amendment-2026.pdf>

Relevant international treaties, standards and obligations

NOT APPLICABLE

Departures from the Legislation Guidelines

NOT APPLICABLE

Other unusual provisions or features

NOT APPLICABLE