



Protecting our heritage into the future

3 April 2025

Vehicle Standards Compliance Amendment (2025)
Rules Team
NZ Transport Agency (Waka Kotahi)
Email: rules@nzta.govt.nz

Please find below the NZ Federation of Motoring Clubs Inc. (FOMC) submission on the Vehicle Standards Compliance Amendment (2025). The FOMC is supportive of both the proposals in the draft Rule, something the FOMC has lobbied for, for some time. We believe these proposals will have transformative benefits for the owners of light vehicles aged over 40 years – the majority of which could be considered enthusiast vehicles – and privately-owned heavy motorhomes, primarily through reduced costs and meaningful time savings, without compromising road safety. We provide detailed evidence and arguments in support below.

Note the FOMC submission primarily focuses on the WoF proposal, but supports the submission provided by our member club, the NZ Motor Caravan Association on the CoF proposal. (Proposal 2 as below).

Background

The FOMC was established in 1994 by a small group of clubs interested in the preservation of their vehicles and the right to use them on public roads without undue restrictions. Over the years since 1994, the FOMC has maintained close communication with Government and transport authorities across many fronts, including Special Interest Vehicles, the LHD permit system for selected vehicles, submissions across a range of Government subjects, and discussions in recent years regarding warrants of fitness regulations.

Today the FOMC comprises 146 clubs, including three particularly large members: the Vintage Car Club of NZ (37 branches and 8,450 members); the NZ Hot Rod Association (109 associate clubs and 4,015 members); and the NZ Motor Caravan Association (112,738 members). The total reach of the FOMC is almost 300 clubs and branches, comprising 142,895 members and 126,095 vehicles.

Proposal 1: Reduce WoF frequency for light vehicles over 40 years old from every 6 months to once a year

The FOMC is supportive of the proposal to reduce the WoF check frequency for light vehicles aged over 40 years old from six monthly to annually.

This would have a transformative positive impact on the owners of the some 128,000 light vehicles aged of 40 years old in the NZ fleet, most of which could be considered heritage vehicles, and whose owners likely also own more modern vehicles which are already subject to annual WoFs (if manufactured from 2000-on).

In addition, there will be negligible safety risks from this proposal because of the low annual mileage vehicles aged over 40 years travel, their low contribution of safety faults in death and serious injury crashes, and their relatively high WoF pass rate.

The Ministry of Transport annual fleet statistics 2023¹ show that the average distance travelled by light passenger vehicles aged 40 years and older is 2,852km per annum. This contrasts with an average mileage of 10,136km p.a. for vehicles manufactured from the year 2000-on, which are subject to annual WoFs. This is consistent with the average annual mileage of 3,700km from the FOMC 2024 survey of club members' vehicles summarised in Appendix 1 (which covers all sectors including more modern classic and Special Interest Vehicles, so it is likely that the average for 40+ year vehicles is less than 3,700 km p.a.).

FOMC analysis of death and serious injury (DSI) crashes from the NZTA's Crash Analysis System (CAS) in Appendix 2 shows that over the ten years from 2013 to 2023, there were just 13 DSI crashes for light vehicles aged 40 years or older (pre-1984), representing just 1.85% of all DSI crashes over that period *where vehicle condition was a contributing factor*. These same 13 DSI crashes represent a miniscule 0.06% of all DSI crashes over the ten-year period.

Further analysis of each of the 13 DSI crashes for 40+ year vehicles revealed that the supporting data indicates that for eight of the crashes, other (non-vehicle) issues were contributing factors. *Therefore the resultant five DSI crashes for 40+ year vehicles attributable to vehicle condition represent just 0.71% of all DSI crashes where vehicle condition was a factor.*

FOMC analysis of WoF data for 2023 in Appendix 3 shows that across 109,531 inspections, vehicles 40+ years have a failure rate of 23%, lower than the national vehicle failure rate of 32% – and the same as vehicles less than 10 years old (23%).

The FOMC 2024 vehicle survey identified that owners of pre-WW2 vehicles spend an average of \$3,000 per vehicle annually on maintenance and servicing, whilst \$7,200 per vehicle is spent on classic vehicles post-WW2 through to 1980.

Over and above the evidence above that supports this proposal for 12-month WoFs for vehicles 40 years and older, there is a strong personal frustration factor that underpins the need for change.

This issue is driven by the fact on-road mileages are very low, with little opportunity for wear and tear between the 6 monthly inspections, adding to the frustrations of owners as nothing had changed. In some cases the only mileage driven is the journey to the testing station and back.

¹ [Ministry of Transport Annual Fleet Statistics \(2023\)](#)

Every WoF inspection involves levels of inconvenience and unproductive time for owners travelling to inspections. Some owners may have to travel considerable distances if their vehicles are stored elsewhere, or they live remotely with limited choice of inspection agents who are familiar with older vehicles. This frustration is further exacerbated by their realisation they already spend far more time and personal expertise than most other motorists on in-house maintenance, regular checks, detailed inspection and vehicle housekeeping, and more.

Many owners have multiple vehicles requiring 6-month WoFs (the national average is 2.8 vehicles per owner for vintage and veteran cars), thereby compounding the “frustration factor” that thousands of the FOMC members and other historic vehicle owners feel and experience with the present 6-month WoF requirements. Quantitatively the issue is even more serious, given the extra compliance costs being faced, and the loss of productive time and contribution to NZ’s economy.

Veteran vehicles

Whilst the FOMC is supportive of the proposal to reduce the WoF frequency for vehicles aged over 40 years to annual, we consider that veteran vehicles (specifically defined as light vehicles manufactured prior to 1919) should be exempted from periodic WoFs because of their even more limited annual mileage, and additional complications with obtaining WoFs.

WoF inspectors are not familiar with the unique (and varied) starting and driving characteristics and peculiarities of veteran cars and motorcycles. In many if not most instances, the vehicle owner (twice yearly) is required to be present throughout the inspection to undertake all dynamic aspects of the process to enable the WoF to be issued. Suspension, braking and steering tolerances are unknown and different and modern regulations are not applicable. This also includes vehicle lighting. Veteran vehicle owners find it difficult to locate WoF inspectors who are familiar with veteran vehicles, and this can add further time cost and inconvenience to owners to take vehicles to such inspectors.

NZTA fleet data shows there are just 650 registered veteran vehicles in NZ. The youngest of these vehicles would now be 106 years of age, and in practice these vehicles are rarely driven on the road, often being trailered to special events and driven short distances on controlled rallies. Due to their age, value and in some cases rarity most owners, through necessity, have become very particular about their condition and are fastidious in their maintenance, often doing the work themselves.

Further, DSI crash data for veteran vehicles (1918 and earlier) in Appendix 2 shows zero crashes over the 20-year period 2003 – 2023.

The low number of veteran vehicles, which are carefully maintained by their enthusiast owners and sparingly used, and the associated negligible crash risk suggest that a lifetime WoF (exemption from periodic inspections) can be supported. We note there is already a precedent for a lifetime WoF, with mopeds under 50cc exempt from periodic inspections, yet these vehicles are more numerous and likely in more regular use than veteran vehicles.

At the very least, given that new cars are not subject to WoFs until age 3, the Federation recommends that the minimum of a 3-year frequency for veteran vehicles should be applied (although this would not wholly address the peculiar challenges outlined above). This initiative would be reinforce the very high historic and heritage values of these special vehicles.

Proposal 2: Reduce CoF frequency for privately owned heavy motorhomes from every six months to once a year

The FOMC also supports the proposal to reduce the CoF frequency for privately owned heavy motorhomes. Similar arguments for reducing the WoF frequency for 'classic vehicles' also applies to private motorhomes; they do modest annual mileages and thus travel limited mileages in between 6-monthly inspections. In addition, there will be significant time and costs savings from this proposal. Heavy vehicles on CoFs have to be taken to specialist testing stations, unlike light vehicles, and so there is less choice for motorhome owners and this may involve travelling greater distances to obtain a CoF, adding time and cost. Further, owners must remain with the vehicle (unlike owners of cars or motorcycles who can leave them and return later), adding waiting time, and in addition the more complex CoF inspection takes longer to perform. For some owners, a CoF inspection could take over half a day to obtain including travel, a time cost currently incurred twice a year.

For further commentary on supporting the proposal, the FOMC endorses the submission by our member club, the NZ Motor Caravan Association.

Additional comment from the Federation: Heavy heritage vehicles

As with vintage vehicles and private motorhomes, similar arguments for an annual CoF frequency could also be applied to heavy heritage vehicles, such as military vehicles and classic trucks, say over 40 years old (as for vintage cars and motorcycles).

Because these vehicles (over 3,500kg GVM) are subject to CoFs, there is less inspector choice in obtaining these, and there is additional cost to owners in terms of both time and CoF fee.

While a 40-year age cut-off may seem reasonable, we understand that an annual CoF should not apply to older heavy vehicles that are be in commercial service, such as some older trucks or buses. Analysis of the Motor Vehicle Register shows there are currently (as at 14 March 2025) just 3,923 registered heavy vehicles (irrespective of age) that do not operate with Transport Service Licences (TSLs), suggesting that these vehicles are not in commercial service. These cover a range of vehicle usage types, including 'Exempt Class A and B', 'Other (Standard) Goods', and 'Private Passenger'. It is likely these usage types will include heritage trucks, buses, as well as military vehicles like tanks, low-loaders and troop carriers.

Therefore the FOMC would support NZTA undertaking further analysis into considering introducing an annual CoF frequency for heavy vehicles that:

- do not have a TSL; and
- are aged over 40 years.

We are using this submission opportunity to "flag" this subject, especially given the significant heritage values of NZ's vintage military vehicles and their importance in significant occasions such as ANZAC day services. The Federation will provide a specific and more detailed proposal to the Minister and the Agency in the near future

Yours sincerely,



Garry Jackson, FOMC President

Appendices:

1. Summary Report of the NZ Historic and Classic Vehicle Research Survey 2024
2. Death and Serious Injury (DSI) statistical analysis of vehicles 40 years and older and veterans from the NZTA Crash Analysis System (CAS)
3. WoF failure rate data

Appendix 1: Summary Report of the NZ Historic and Classic Vehicle Research Survey 2024

The Summary Report of the NZ Historic and Classic Vehicle survey is available here: https://fomc.nz/wp-content/uploads/NZHCVS_Summary_Report_Feb_2024_Small.pdf

The headline outcomes are:



Appendix 2: Crash data for Heritage and Classic Vehicles

This appendix presents Death and Serious Injury (DSI) data from the NZ Transport Agency Waka Kotahi Crash Analysis System (CAS) for vehicles manufactured prior to 1982 (being 40 years and older), being the group mostly represented by the NZ Federation of Motoring Clubs Inc.

Purpose

Report on DSI (Death and Serious Injury) crashes where “the vehicle” was the contributing factor for:

1. All light vehicles manufactured prior to 1984 for the 10-year period 2013 to 2023
2. Veteran vehicles (manufactured prior to 1919) for the 20-year period 2003 to 2023

Data Sources

1. The NZ Transport Agency (Waka Kotahi) Crash Analysis System was used to prepare these reports using the NZ Federation Of Motoring Clubs subscription: <https://cas.nzta.govt.nz>
2. Crash “Causative and contributory factors”: <https://www.nzta.govt.nz/assets/Safety/docs/cas-factor-codes.pdf>

CAS Query Details

The following queries were used to prepare the report on 11 April 2024:

- Crash Severity: Fatal Crash & Serious Crash
- Vehicle Type: Car/Wagon, Van, Ute & Motorcycle
- “Vehicle” causative and contributory factors:

Factor Code	Factor Description
610	Brakes (other)
615	Jack-knifed – uneven braking
620	Steering (other)
621	Defective steering
622	Steering failed suddenly
630	Tyres (other)
632	Worn tread on tyre
633	Incorrect tyre type
634	Mixed tyre types (tread) / space savers
650	Mechanical (other)
651	Engine failure
652	Transmission failure / broken axle
653	Accelerator or throttle jammed
660	Chassis/ gear (other)
661	Body, chassis or frame (cycle / motorcycle) failure
662	Suspension failure
664	Door/Body (other)

667	Door / bonnet catch failed, defective or not shut
668	Wheel off
690	Vehicle (other)
692	Vehicle caught fire

And:

Vehicles manufactured prior to 1984:

- Crash Year: 2013-2023
- Manufacturing Year: 1901-1984

Veteran vehicles:

- Crash Year: 2003-2023
- Manufacturing Year: 1901-1918
- Results

Table 1: DSI's for vehicles manufactured prior to 1984. vs. all vehicles for 10 year period 2013-2023

DSI's (Vehicles > 1984)	DSI's (All vehicles with "defects")	Ratio	DSI (All vehicles)	Ratio
13	702	1.85%	22,496	0.06%

Table 2: Detail of DSI's for vehicles manufactured prior to 1984

This table contains further detail of the 13 DSI's from Table 1 (DSI Crashes for Vehicles manufactured prior to 1984 over the last 10 years).

It appears not all crashes may be primarily due to the vehicle contributing to the crash (they are highlighted grey in the table).

Therefore, if "Vehicle" was not the primary contributory factor for the crash, the figure could potentially be reduced from 13 to 5 DSI crashes, dropping the ratio from 1.85% to 0.71%

Crash road	Side road	Date	Description of events	Crash factors	Surface condition	Natural light	Weather	Casualty count fatal	Casualty count serious	Social Cost \$(m)
005-0008	WAIHOTO ROAD	11/08/2015	Van1 EDB on SH 5 lost control; went off road to right, Van1 hit bank, tree	VAN1, alcohol test above limit or test refused, speed on straight, too far right, worn tread on tyre, ENV:	Dry	Dark	Fine	1	0	16.64

Crash road	Side road	Date	Description of events	Crash factors	Surface condition	Natural light	Weather	Casualty count fatal	Casualty count serious	Social Cost \$(m)
				road surface potholed						
AYRSHIRE DRIVE	ANGUS ST	14/06/2018	Car/Wagon1 NDB on AYRSHIRE DRIVE, GRANDVIEW HEIGHTS, HAMILTON lost control turning left	CAR/WAGON1, accelerator or throttle jammed, lost control - vehicle fault	Dry	Bright sun	Fine	0	1	1.01
HYDERABAD ROAD	TARADALE ROAD	21/01/2023	Motorcycle1 EDB on HYDERABAD ROAD lost control turning right but did not leave the road	MOTORCYCLE1, lost control - vehicle fault, other tyres	Dry	Overcast	Fine	0	1	2.55
PUKEPAPA ROAD	WHALES LINE	11/02/2014	Car/Wagon1 SDB on PUKEPAPA ROAD lost control; went off road to left, Car/Wagon1 hit non specific fence	CAR/WAGON1, other lost control, steering failed suddenly	Dry	Overcast	Fine	0	1	1.1
RAWENE ROAD	MANNING STREET	17/12/2022	Car/Wagon1 SDB on RAWENE ROAD lost control on curve and hit Car/Wagon2 head on	CAR/WAGON1, alcohol test below limit, lost control when turning, other inattentive, speed entering corner/curve, vehicle caught fire CAR/WAGON2, alcohol test below limit	Wet	Overcast	Light rain	0	3	2.02
SH 1S	SANDS ROAD	02/09/2017	Car/Wagon1 SDB on Timaru - Pareora Highway hit Car/Wagon2 headon on straight	CAR/WAGON1, alcohol test below limit, drugs suspected, incorrect tyre type, service brake defective, too far right	Dry	Overcast	Fine	1	3	16.28
SH 2	FERMAH ROAD	29/10/2014	Motorcycle1 EDB on SH 2 swinging wide	MOTORCYCLE1, speed entering corner/curve, swung wide on	Dry	Overcast	Fine	1	0	15.26

Crash road	Side road	Date	Description of events	Crash factors	Surface condition	Natural light	Weather	Casualty count fatal	Casualty count serious	Social Cost \$(m)
			hit Car/Wagon2 head on	bend, vehicle caught fire						
SH 2	PURIRI CRESCENT	02/09/2016	Car/Wagon1 EDB on Matata Road lost control; went off road to left, Car/Wagon1 hit non specific pole	CAR/WAGON1, accelerator or throttle jammed, alcohol test below limit, lost control under acceleration, speed on straight	Dry	Dark	Fine	0	1	2.37
SH 24	STOPFORD ROAD	16/04/2016	Van1 EDB on SH 24 miscellaneous, Van1 hit non specific cliff	VAN1, cutting corner on bend, vehicle caught fire	Dry	Bright sun	Fine	2	1	16.7
SH 3	OROUA ROAD	29/09/2014	Motorcycle1 NDB on SH 3 hit Car/Wagon2 turning right onto AXROAD from the left	CAR/WAGON2, did not check/notice another party from other dirn, failed to give way at priority traffic control MOTORCYCLE1, vehicle caught fire	Dry	Bright sun	Fine	0	1	1.1
SH 6	SH 98	08/04/2016	Car/Wagon1 SDB on SH 6 hit rear end of Car/Wagon2 stopped/moving slowly, Car/Wagon1 hit non specific pole, Car/Wagon2 hit non specific pole	CAR/WAGON1, alcohol test above limit or test refused, did not check/notice another party from other dirn, over the speed limit, speed on straight CAR/WAGON2, vehicle caught fire	Wet	Dark	Light rain	0	4	2.1
THOMPSONS TRACK	BRAEMAR ROAD	12/07/2017	Car/Wagon1 WDB on Thompsons Track lost control; went off road to right, Car/Wagon1 hit non specific pole	CAR/WAGON1, other fatigue, too far right, vehicle caught fire, ENV: snow, sleet or hail	Ice or Snow	Dark	Snow	0	1	1.95
TUNNEL ROAD		30/12/2023	Car/Wagon1 NDB on TUNNEL ROAD	CAR/WAGON3, vehicle caught fire	Dry	Dark	Fine	2	3	17.48

Crash road	Side road	Date	Description of events	Crash factors	Surface condition	Natural light	Weather	Casualty count fatal	Casualty count serious	Social Cost \$(m)
			cutting corner hit Motorcycle2 head on	MOTORCYCLE2, alcohol suspected, vehicle caught fire CAR/WAGON1, speed entering corner/curve, wrong way in one way street, motorway or roundabout						

Table 3: DSI's for Veteran vehicles (pre-1918) for 20 year period 2003-2023

Over the past 20 years, there have been no DSI's for Veteran vehicles, manufactured prior to 1/1/1919.

DSI's (Veteran Vehicles Pre-1920)	DSI's (All vehicles with "defects")	Ratio	DSI (All vehicles)	Ratio
0	702	0%	22,496	0%

Appendix 3: WoF Failure Data Analysis

Data extracted from Motor Vehicle Register (MVR) on 13 May 2024 and is current as at 12 May 2024

Light Vehicle Warrant of Fitness (WoF) Inspections by Vehicle Age for inspection year 2023				
Vehicle age group	Total Insp'ns	Failed Insp'ns	Passed Insp'ns	Fail rate
Up to 10 years old	2,004,223	457,589	1,546,634	23%
10 years up to 20 yrs old	2,574,054	970,289	1,603,765	38%
20 years up to 30 yrs old	873,468	339,863	533,605	39%
30 years up to 40 yrs old	137,593	48,610	88,983	35%
over 40 years old	109,531	25,385	84,146	23%
Total	5,698,869	1,841,736	3,857,133	32%

Total active registered light fleet* as at 31 December 2023				
Vehicle age group	Current Licence	Expired Licence	Licence on exemption	Total
Up to 10 years old	1,813,007	34,156	18,101	1,865,264
10 years up to 20 yrs old	1,648,858	113,740	79,539	1,842,137
20 years up to 30 yrs old	391,405	72,361	110,143	573,909
30 years up to 40 yrs old	58,280	14,343	75,023	147,646
over 40 years old	56,989	16,407	85,672	159,068
Total	3,968,539	251,007	368,478	4,588,024

* includes all light vehicles subject to either WOF or COF