Vehicle Standards Compliance Amendment 2025

Rules Team

NZ Transport Agency

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1. We are writing to support the proposal to reduce the WoF check frequency for light vintage vehicles aged over 40 years old from six monthly to annually, as proposed in the Vehicle Standards Compliance Amendment 2025.

Our club has [NUMBER OF MEMBERS] members, representing [NUMBER OF VEHICLES] vehicles, of which [PERCENT] of vehicles are aged over 40 years.

[PROVIDE ANECDOTES ABOUT HOW THESE VEHICLES ARE USED. e.g. primarily for club events, and that the owners all own more modern vehicles that are used regularly and do higher mileages but are only subject to annual WoFs].

This proposed change would have a positive impact on our members because [ADD REASON, e.g. net social and financial cost savings by reducing the WoF frequency].

[ADD ANY ADDITIONAL COMMENTS, ANECDOTES ABOUT HOW THE VEHICLES ARE USED, EVIDENCE AND OTHER STORIES AS YOU WISH]

1. 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. This is supported by research by the Federation of Motoring Clubs:

* The *MoT fleet Statistics 2023*[[1]](#footnote-1)state that the average distance travelled by light passenger vehicles aged 40 years and older is 2,852km per year. 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[[2]](#footnote-2) (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 3,700km p.a.)
* FOMC analysis of death and serious injury (DSI) crashes from the NZTA’s Crash Analysis System (CAS)[[3]](#footnote-3) shows that over the ten years 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[[4]](#footnote-4) 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 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

[YOUR NAME]  
[YOUR TITLE e.g. President, Chair]

[YOUR CLUB NAME]

[DATE]

1. [*Ministry of Transport Annual Fleet Statistics (2023)*](https://www.transport.govt.nz/statistics-and-insights/fleet-statistics/annual-fleet-statistics/) [↑](#footnote-ref-1)
2. [*FoMC Historic and Classic Vehicle Survey (2024)*](https://fomc.nz/nzhcvs/) [↑](#footnote-ref-2)
3. [*FoMC NZTA WoF proposal May (2024)*](https://fomc.nz/wp-content/uploads/FoMC-NZTA-WOF-Proposal%20Paper-2024-05-20.pdf) [↑](#footnote-ref-3)
4. *Data extracted from Motor Vehicle Register (MVR) on 13 May 2024 and current as at 12 May 2024* [↑](#footnote-ref-4)