

13 March 2023

Matt Tagg  
fyi-request-21816-46adb38a@requests.fyi.org.nz

REF: OIA-12027

Dear Matt

**Request made under the Official Information Act 1982**

Thank you for your email of 13 February 2023 requesting the following information under the Official Information Act 1982 (the Act):

- 1. The full policy wording for auto renewal of vehicle licenses.*
- 2. The reasoning behind the 25 vehicle limit and why this restriction was put in.*
- 3. Any study of the effects that such a limit has on increased compliance costs for regular citizens and small businesses who fall under the 25 vehicle limit.*
- 4. The process for requesting a review/change of the 25 vehicle limit for auto-renewals.*

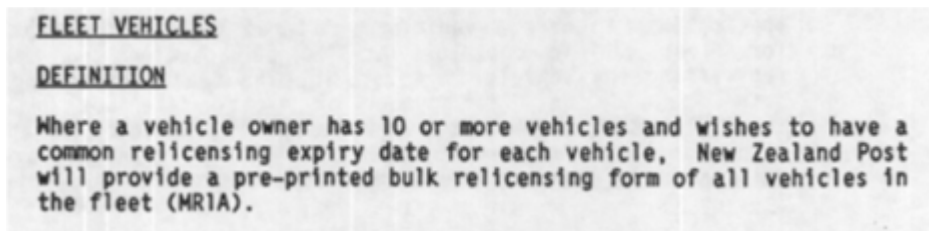
Responses to each part of your request are set out below:

**1. The full policy wording for auto renewal of vehicle licenses.**

To provide clarification, Waka Kotahi NZ Transport Agency does not have an automatic licensing facility. While the actual licensing renewal is automated from the customer's perspective, the fleet licensing service is a manual process carried out by Waka Kotahi staff. The administrative tasks actioned by Waka Kotahi include, but are not limited to, setting customers up with a direct debit authority, updating vehicles which have been sold, additions to fleets, correcting customer errors and arranging refunds.

With regard to this part of your request, Waka Kotahi does not have a policy for fleet licensing; rather it is a business facility specifically for fleet owners that was implemented prior to the inception of the Land Transport Safety Authority (the predecessor of Waka Kotahi).

At the time of its implementation, the Motor Registration Centre, (which formed part of the Post Office), had a process in place for fleet owners. The following is an excerpt from old records (circa 1991) regarding bulk relicensing for fleet vehicles:



As there is no policy document, in lieu of this, a copy of the internal process used by Waka Kotahi for fleet licensing is provided in the following attachment:

- OIA-12027 – Fleet licensing process.pdf

**2. The reasoning behind the 25-vehicle limit and why this restriction was put in.**

The 25-vehicle limit was implemented prior to 2004. Due to the time elapsed, Waka Kotahi does not hold documentation which confirms why the limit increased from 10 to 25 vehicles (see excerpt provided in response to question 1). However, it is expected that the decision made to not only have a limit, but to also increase that limit, was based on the cost of providing this service.

As advised in the response to question 1, these are manual administrative tasks carried out by staff, which comes at a cost to Waka Kotahi. There is no additional administration fee which fleet licensing customers are subject to in order to cover the costs to carry out these administrative processes.

However, it would be considered unreasonable for customers/companies who have large amounts of vehicles in their fleet (often with 100 or more) to complete manual transactions for each individual vehicle. Hence, the continuation of the fleet licensing facility implemented by the Motor Registration Centre.

**3. Any study of the effects that such a limit has on increased compliance costs for regular citizens and small businesses who fall under the 25-vehicle limit.**

In 2012, a review of the vehicle licensing system was carried out as part of the Vehicle Licensing Reform Project (the Project). At that time, there was consideration for customers with multiple vehicles. The below is an excerpt from a Cabinet paper regarding a proposal to modernise vehicle licensing business processes:

**23.3. making online payment more attractive, intuitive, and easy to access, and introducing mobile device capability. Owners of multiple vehicles will also be able to align the expiry dates for their vehicles and relicense them in one transaction. Commercial operators will be able to manage their vehicle fleets online, instead of through the current manual process**

At the time, the idea was to provide a type of self-service and extensive investigative work was undertaken into implementing such a facility. There were two considerations, one for private vehicle owners with multiple vehicles and also commercial vehicle owners with multiple vehicles.

During the Project, a customer research report was put together and referred to as the Providence report. This document was likely to have included research on the multiple vehicle issue, such as

compliance issues with renewing multiple vehicle licences. Unfortunately, due to changes in record keeping systems over the years, Waka Kotahi is unable to locate a copy of this report.

Therefore, I am refusing this part of your request under section 18(e) of the Act, as the document alleged to contain the information requested, despite reasonable efforts to locate it, cannot be found.

With that said, we have located a customer research and data analysis document. This is a document that gathered conclusions from the data analysis that was performed and the results of the second stage of customer research. The purpose of the document was to present a rounded view of the current state of vehicle licensing in New Zealand at the time.

This document is provided in the following attachment:

- OIA-12027 – Customer research and data analytics.pdf

**4. The process for requesting a review/change of the 25-vehicle limit for auto-renewals.**

As advised above, due to the costs in managing the fleet system as well as the online vehicle licensing service providing customers with a more convenient and cheaper way to license their vehicle, it is unlikely Waka Kotahi will be able to consider making changes to lower the 25-vehicle limit.

However, should you still wish to request a review, you are welcome to email [fleet@nzta.govt.nz](mailto:fleet@nzta.govt.nz). The fleet licensing team and their respective manager will review and provide a response accordingly.

Furthermore, you may be interested to know that if you have multiple vehicles, you can align all of the licence expiry dates by completing an '*Application to Change Licence Expiry Date (MR27 form)*', which allows you to nominate a specific date for the new licence to expire on. This way, all of your vehicle licences can be renewed in one day, preventing you from needing to keep track of multiple expiry dates.

If you would like to discuss this reply with Waka Kotahi, please contact Ministerial Services by email at [official.correspondence@nzta.govt.nz](mailto:official.correspondence@nzta.govt.nz).

Yours sincerely



**Emma Bevin**  
Manager Customer Services