



Submission to the NZ Transport Agency Waka Kotahi on the Vehicle Standards Compliance Amendment 2025

April 2025



This submission is from:

Motor Trade Association (MTA)

Vehicle Testing New Zealand (VTNZ)

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Kind regards,

A handwritten signature in black ink, appearing to read 'James McDowall', written in a cursive style.

James McDowall

Head of Advocacy

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1. About the submitters

This is a joint submission by the Motor Trade Association (MTA) and Vehicle Testing New Zealand (VTNZ).

MTA is the peak body for New Zealand's automotive industry, and represents more than 4,200 businesses that fix, fuel, buy, sell, and inspect the country's vehicle fleet – helping families and communities travel and connect safely. Members work in general and specialist automotive repair, service stations, parts and accessories, auto electrical, new and used vehicle importers and dealers, inspection, collision repair, and vehicle recovery. MTA is recognised as an authority on matters relating to the industry.

Around 3,000 of MTA members are workshops which conduct Warrant of Fitness (WoF) and Certificate of Fitness (CoF) inspections and repairs. MTA is also a shareholder in VTNZ.

VTNZ is the largest vehicle inspection business in New Zealand and the only inspection organisation operating nationwide, with more than 75 locations from Kaitaia to Invercargill. VTNZ completes approximately one million vehicle inspections and as independent examiner, there is no conflict of interest between inspection and repair. VTNZ is also part of the DEKRA Group which is the largest vehicle inspection company globally, completing more than 28 million vehicle safety inspections.

The two organisations, and by extension this submission, represents approximately 90 percent of vehicle inspectors in New Zealand.

2. About this submission

In preparing this submission, VTNZ has drawn on its extensive inspection database to provide the regulator insight into the current state of private motorhomes that require CoF B inspections, i.e. >3,500kgs, to inform the decision-making process.

VTNZ completes approximately 20,000 inspections on private motorhomes across the country each year – approximately 50% of all inspections for this category.

MTA has canvassed members involved in the inspection of motorhomes and vintage cars and included some verbatim comments in this submission.

3. Position summary

MTA and VTNZ are unable to support the proposed changes to CoF B for motorhomes. If the change to 12-monthly inspections were to nonetheless proceed, we strongly recommend that it only apply to motorhomes that are less than 20 years old.

Motorhomes are sizeable vehicles that make up a significant portion of the country's fleet. The consequences of an accident involving a motorhome can be catastrophic, not only for the occupants but also for other road users, who must be the primary consideration.

In our view, the need to recognise and manage safety concerns appropriately outweighs any inconvenience to motorhome owners. A CoF B fail rate of 26-29% does not suggest a safe overall fleet. Even more alarming, for motorhomes more than 20 years old, the fail rate increases to 47.85%.

Of particular and pressing concern is the obvious deterioration in motorhome condition with age. The data does not support a move to 12-monthly inspections, especially for any vehicle older than 20 years, given that fail rates and the number of fail items increase as the vehicle ages.

The overall data suggests that there is no real difference between motorhomes and the total CoF B market – many of which are commercial vehicles used and maintained regularly to maximise their availability for business.

We therefore advise against any reduction in the frequency of CoF inspections on privately-owned heavy motorhomes aged 20 years or older. This should be applied by a rolling age, as opposed to a start year (i.e. the WOF regime).

MTA and VTNZ understand the rationale behind the vintage vehicle proposal, and have no opposition to the shift to a 12-monthly WoF inspection cycle. Based on member feedback and data, we accept that vintage vehicles are usually well-maintained, and there is no evidence that changing their WoF frequency raises safety concerns.

4. Data and evidence

Data from inspections tells a compelling story.

The overall failure rate for the last three years of motorhomes inspected by VTNZ is 27.85% (see Table 1).

When the data is split between modern and older motorhomes the results differ significantly. For older motorhomes (older than 20 years) the fail rate increases to 47.85%, while modern (under 20 years old) drops to 25.91%.

This clear demarcation based on vehicle age makes a strong case suggesting that the ‘one size fits all’ approach proposed raises significant safety concerns.

As one MTA member wrote: *“You CAN NOT put a blanket time frame across all vehicles when all the vehicles cover drastically different kms per year over all sorts of terrain.”*

The main reasons for failure are Underbody, Exterior and Brakes (Table 2). Underbody and Exterior typically relates to rust, although it can apply to many other failures.

An MTA member: *“Last week we saw a Fiat Ducato 2017 with a completely rusted through front bumper support. We commonly see mid 2000 Merc sprinters and Ford Transit with severe rust needed repairs every 6 months.”*

Brakes failure or poor performance can also be the result of many reasons, but lack of use is a significant cause.

An MTA member: *“Campervans don’t get the luxury of being garaged over the winter, if lucky they get a car port! My concern with campers is that they sit outside all winter, then used to cover quite large KMs... campervans should stick to the six-month rule.”*

As motorhomes are often driven under heavy loading, brake quality is of paramount importance.

Deterioration in the condition of the body and/or brakes of a motorhome raises significant safety concerns, particularly in older vehicles.

We strongly recommend that these safety concerns are given due weight in the decision-making process.

As an aside, it is noted that members of the Motor Caravan Association typically have lower fail rates, averaging at 24%, suggesting that this organisation is performing an excellent advisory and support service to its membership. VTNZ maintains a healthy relationship with the Motor Caravan Association meeting regularly to assist this.

5. The link between age and failure

Vehicle condition typically declines with age. The trend in fail rate compared to age is clear and linear (Table 3). Of concern, as fail rates increase with age, the number of fail items also increases (Table 4). This doubling effect underpins the argument for older motorhomes to be inspected at shorter intervals than 12 months, particularly as they age.

6. About CoF B

The requirements of a CoF B inspection are more robust than a WoF. CoF B inspections require a certified load weighing roller brake machine to perform brake inspections that require regular calibration. In addition, all vehicles are required to be tested at a specified weights according to the vehicles attributes and load carrying capacity.

Where a vehicle is not able to meet the specified weight, VTNZ has machines that can simulate the required weight. WoF brakes are not required to be tested to this extent, often only having a decelerometer placed in the vehicle while being tested. Any consideration of changing motor homes currently categorised as CoF B would result in a reduction of brake testing integrity, a significant concern for any heavy vehicle.

When compared to all heavy vehicles, private motorhomes have a failure rate of 27.8% vs a total CoF B failure rate of 26%

Motorhomes from 2005 onwards perform at or slightly better than the wider CoF B. However, motorhomes 20 years or older are failing more than CoF B. Motorhomes older than 30 years are failing 10% more often than the wider CoF B fleet. This suggests that motorhomes should not be treated any differently than the total market.

7. Concluding remarks

MTA and VTNZ submit that the current CoF B frequency for motorhomes is appropriate to address safety concerns and presents a safer alternative to that proposed. While we appreciate that some motorhome owners are scrupulous in maintaining the condition of their vehicle, it is clear from inspection data that the deterioration in the integrity of the vehicle as it ages poses a threat to safety that can only be managed by maintaining the status quo. If the Government proceeds with the shift to 12-monthly inspections, it should only be applied to motorhomes less than 20 years old.

Appendix - Tables

Table 1 – Failure Rate for Motorhomes

Year	Inspections Per Year	Year	Failure Rate Per Year
2023	20062	2023	29.48%
2024	19700	2024	26.46%
2025	4385	2025	26.64%

27.85%

Overall Failure Rate

Modern 25.91% Overall Failure Rate	Modern 40,045 Total Unique Inspections
Old 46.78% Overall Failure Rate	Old 4,102 Total Unique Inspections

Table 2 – Reasons for Failure



Table 3 – Failure by Age

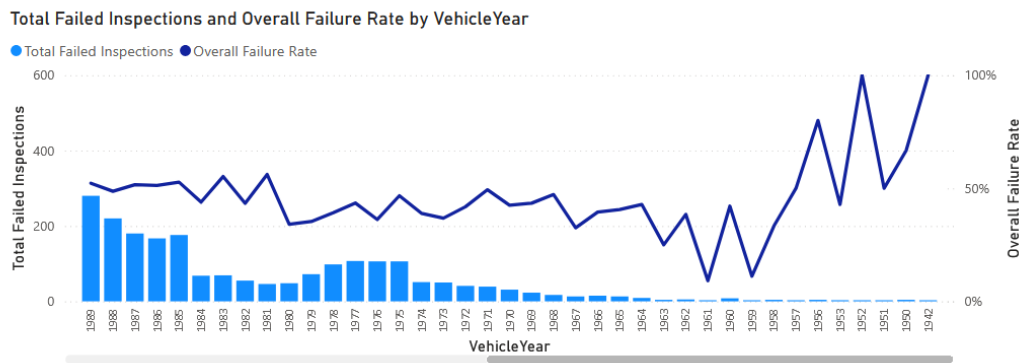
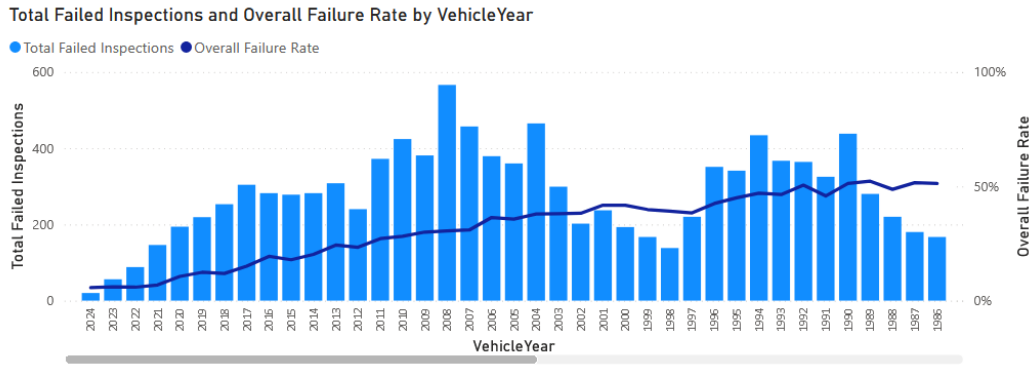
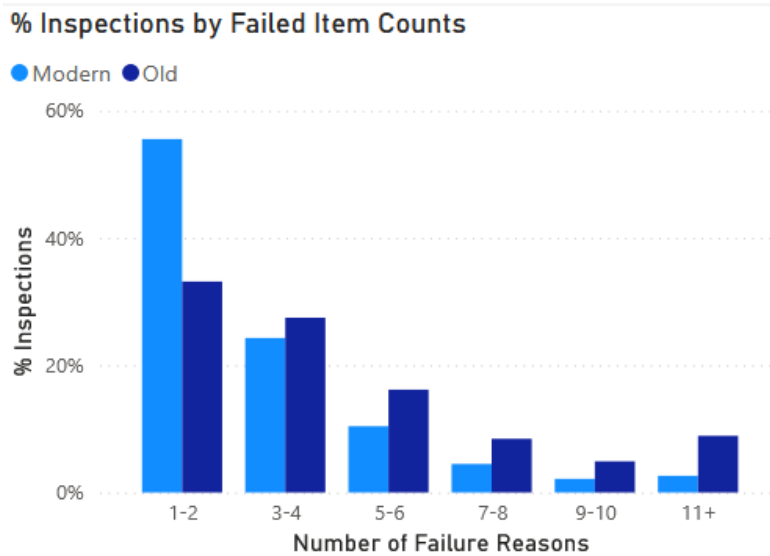


Table 4 – Number of reasons for failure



Number of Failures By Vehicle Age (12 or less)

● 1-2 ● 3-4 ● 5-6 ● 7-8 ● 9-10 ● 11+

