

15 December 2025

Rules Team
New Zealand Transport Agency Waka Kotahi
Wellington

By email: rules@nzta.govt.nz

ICNZ Submission on the Consideration of New Safety Requirements for Vehicles Entering the New Zealand Fleet.

Thank you for the opportunity to provide feedback on the consideration of new safety requirements for vehicles entering the New Zealand fleet as outlined in the NZTA discussion document 29 October 2025.

Te Kahui Inihua o Aotearoa | The Insurance Council of New Zealand (ICNZ) represents general insurers. Our members accept the risks of over NZ\$2 trillion of New Zealand's assets and liabilities. ICNZ's members provide insurance products ranging from those usually purchased by individuals (such as home and contents insurance, travel insurance, and motor vehicle insurance) to those purchased by small businesses and larger organisations (such as product and public liability insurance, professional indemnity insurance, cyber insurance, forestry & horticulture insurance, livestock insurance, commercial property insurance, and directors' and officers' insurance).

The Insurance Council has consulted with its member insurers that provide motor insurance products on the proposed changes.

1. Automatic emergency braking for light and heavy vehicles.

ICNZ and its members generally supports that mandating of automatic emergency braking for both light and heavy vehicles entering the New Zealand fleet as it will likely reduce collision accident rates and cost of insurance claims.

The cost of repairing and recalibrating Advanced Driver Assistance Systems (ADAS) that normally incorporates the automatic emergency braking feature.

Insurers are finding that as the costs rise for replacing damaged windscreens and camera systems due to the inability to repair them, they are writing a greater percentage of vehicles off now that are equipped with ADAS. This is one of the reasons that motor insurance premiums have risen over the last 5 to 6 years.

ICNZ would like to see the progression of the Right to Repair legislation that could help keep repairs costs down for these technology based safety systems.

2. Lane keep support systems for light and heavy vehicles

As with automatic emergency braking for both light and heavy vehicles, ICNZ and its members generally supports this safety technology being mandated for new and used vehicle entering the New Zealand fleet as it should improve road safety by reducing collisions and cost of insurance claims. We do need to raise the issue of repair cost as we have with automatic emergency braking since lane keep support systems are part of ADAS and require windscreens and camera systems to be undamaged and be in factory calibration. Cost for repairing ADAS systems is high.

3. Electronic stability control for heavy vehicles.

ICNZ and its members do support electronic stability control for heavy vehicles to be mandated for new and used heavy vehicles entering the New Zealand fleet. Electronic stability control should reduce heavy vehicle collisions and rollovers that are costly to the economy and increase claims costs significantly. New Zealand's variable roading terrain weather conditions certainly allows for electronic stability control systems on heavy vehicle make sense.

4. Anti-lock braking systems for heavy vehicles

ICNZ and its members do support Anti-lock braking systems being mandated for heavy vehicles new or used entering the New Zealand fleet for the same reasons we support electronic stability control systems in heavy vehicles.

Anti-lock braking systems are the basis for more advanced electronic stability control systems in heavy vehicles. We would support anti-lock braking systems being mandated for truck trailers as this will add to the braking safety of the entire heavy vehicle combination (the prime mover and its trailers)

5. Acoustic vehicle alerting systems for "quiet" (electric and hybrid) light and heavy vehicles

ICNZ and its members do support the mandating of Acoustic vehicle alerting systems for "quiet" (electric and hybrid) light and heavy vehicles for new or used vehicles entering the New Zealand fleet because of the safety benefits for pedestrians, cyclists and other road users.

ICNZ and its members do support the mandating of these vehicle safety systems for vehicles entering the New Zealand fleet in the near future. The positive outcomes will be less vehicle collisions and roll overs and reduction in injuries and deaths on New Zealand roads.

We do point out that ADAS systems such as Automatic emergency braking and Lane keep support systems that currently use camera systems and require a windscreens free of damage can add costs to insurance repairs that will likely lead to higher premiums, unless we can reduce the cost of these repairs to these ADAS systems.

We strongly recommend that when second-hand motor vehicles are imported into New Zealand, that the ADAS systems are verified as operational (working with out faults) and that the ADAS systems can be recalibrated in New Zealand for the ongoing service life of the vehicle.

Please contact me if you do have any questions concerning our feedback.

Ngā mihi,

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name 'John Lucas'.

John Lucas

Insurance Manager

Insurance Council of New Zealand – Te Kāhui Inihua o Aotearoa