



Vehicle Licensing Reform

- > Annual vehicle licensing
- > Warrant of fitness/certificate of fitness
- > Transport services licensing

Conversation paper

Vehicle Licensing Reform opportunities

May 2012



Not Government Policy

This is a paper produced specifically for a stakeholder workshop held on May 10, 2012. No general public reply to the questions listed in this document is expected as these were formulated for the purposes of the workshop and gathering feedback from workshop attendees on that day. Public consultation will be undertaken later in the year.

FOREWORD

The current transport regulatory model has now been in place for 30 years or more. Revisiting this model can help us with New Zealand's economic, environmental and social challenges, allow for technological advances, and deliver for a government strongly focused on economic growth.

Transport regulation has a large impact on the economy and society. Well designed regulation can enhance innovation, reduce unnecessary burdens on business and promote economic growth.

With transport making up around five percent of Gross Domestic Product, even small productivity improvements could have significant benefits for households and businesses over time.

The Ministry of Transport and transport agencies have started a programme to improve the way transport is regulated. On 28 March 2012, the Minister of Transport, Hon Gerry Brownlee, announced that three regulatory systems in the land transport sector deserved a fresh look. Collectively, the annual vehicle licensing, warrant of fitness and certificate of fitness and transport services licensing systems involve significant time and cost for many New Zealanders. The challenge that the government

has set is to explore opportunities to lower compliance costs while achieving similar or improved safety and environmental outcomes.

No decisions have been made about the future of these systems. The upcoming Vehicle Licensing Reform stakeholder workshop is an opportunity for shared discussions about the strengths and weaknesses of the existing systems, and a chance to reflect on what they might look like in the future. This will give us a base to develop options for delivering on the government's challenge. This conversation paper is an important early milestone in this process.

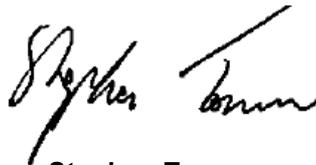
In the coming weeks and months, we need to ask some hard questions about these three systems. Why were they introduced? Are they still relevant? If so, are there better ways to achieve the desired outcomes?

These questions are not going to be easy for us, especially as the current arrangements have been in place for a long time. However, answering these questions will allow us to do some innovative thinking to identify significant opportunities for reform of these systems.

We know you are busy, so we appreciate your willingness to give us your time and help in this process.



Martin Matthews
Chief Executive
Ministry of Transport



Stephen Town
Acting Chief Executive
NZ Transport Agency

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VEHICLE LICENSING REFORM

“... ineffective regulation is of no value, though it may provide some symbolic, political or emotional comfort to some actors in the regulatory space. Effective but inefficient regulation may be a waste of public resources.”

The Tools of Regulation, p.23, Arie Freiberg, Sydney: The Federation Press, 2010

New Zealand faces a number of economic, social and environmental challenges, and a rapidly changing technological environment. These challenges imply a need to take a very different approach to regulation.

Vehicle Licensing Reform responds to the government's goals for better and less regulation, and aims to improve the performance of these important systems.

Regulation that will deliver the outcomes society wants effectively and efficiently will most likely help the government achieve its economic and social priorities. Regulation also needs to be fair, flexible and transparent. It needs to take account of risks of potential harms. In other words, our regulatory systems need to be ‘fit for purpose’.

The aim of this paper is to ask some questions to help start a conversation at the stakeholder workshop about the annual vehicle licensing, the warrant of fitness and certificate of fitness, and transport services licensing systems and how they might look in the future.

The conversation paper is split into several sections.

- Taking a new approach to regulation.
- Annual vehicle licensing.
- Warrant of fitness and certificate of fitness.
- Transport services licensing.

The questions asked in this paper are conversation starters – they are not intended to limit it.

Vehicle Licensing Reform is a joint Ministry of Transport and NZ Transport Agency review and is part of a wider regulatory reform programme.

Information on Vehicle Licensing Reform can be found at www.transport.govt.nz

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TAKING A NEW APPROACH TO REGULATION

Encouraging economic growth through reduced regulatory burdens

“We believe that better regulation, and less regulation, is essential to assist New Zealand to become more internationally competitive and a more attractive place to live and do business.”

Hon Bill English and Hon Rodney Hide, Better Regulation, Less Regulation, August 2009

The ‘transport and storage’ sector accounts for around five percent of Gross Domestic Product (GDP) and around five percent of the total employment in New Zealand. Because transport industries and transport infrastructure work together to support the economy, they also play a critical role in New Zealand’s global competitiveness by increasing productivity and facilitating growth. As an exporting country, we need to reduce the cost of moving our goods from our farms and factories to the markets in which they are sold. New Zealand exports about \$43 billion of goods per annum.

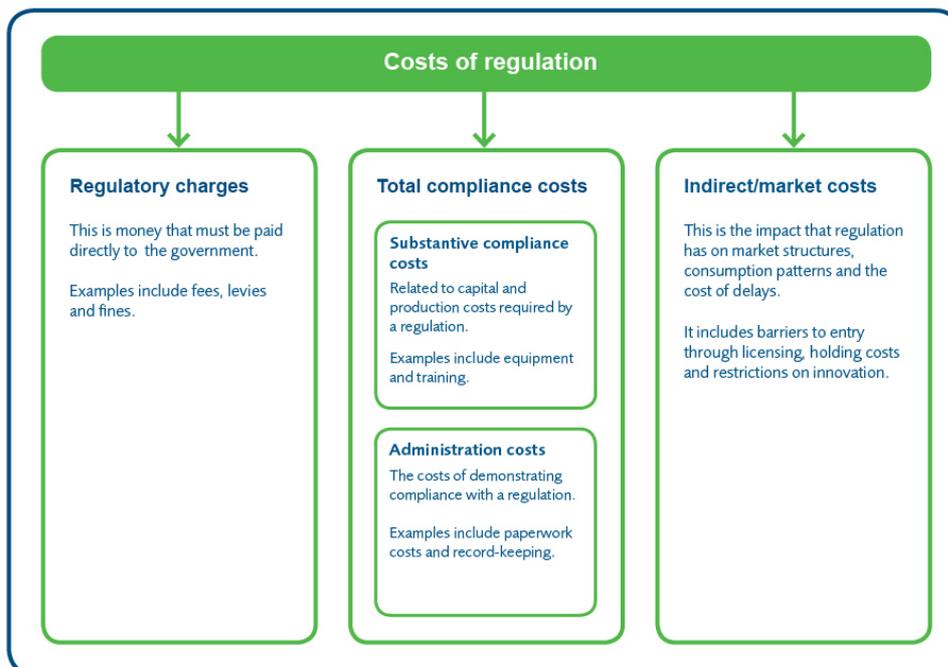
Studies generally confirm that regulatory settings impact on economic growth¹ because they can affect productivity growth.

Reducing business costs will enhance productivity growth, so tackling these costs is a priority for the government. To achieve this, the government wants to “cut red tape”. Figure 1 describes the costs that follow from regulatory intervention.

Annual vehicle licensing, warrant of fitness and certificate of fitness and transport services licensing systems place significant costs on individuals, families and businesses. Because there are over 14 million transactions involved each year, there is likely to be scope to find ways of reducing these costs, without significantly compromising intended outcomes.

Figure 1: The costs of regulation

(Diagram reproduced from Measuring the Costs of Regulation, New South Wales Government, June 2008)



¹ Casey, Anthony and Hall, Julia, *International Comparative Surveys of Regulatory Impact*, New Zealand Treasury, July 2006: P.3

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“Smart regulation aims at regulating where there is a need to do so while keeping costs to a minimum.”

European Commission. European Commission – Better Regulation. ec.europa.eu. 2011. 22 June 2011.
http://ec.europa.eu/governance/better_regulation/index_en.htm

Regulatory best practice

Regulatory authorities around the world have been developing best practice regulatory principles to lift the quality of regulation by changing the way it is made. These often cover matters such as:

- proving the case for government intervention is warranted
- making sure regulation is risk-based and focusing enforcement on what matters
- encouraging positive behaviour to achieve compliance or to avoid regulation altogether
- ensuring interventions are proportional and set at the minimum level needed
- promoting the flexibility and durability of regulation
- providing certainty for business and households
- ensuring transparency and accountability

Vehicle Licensing Reform is about using these kinds of principles to pose questions around annual vehicle licensing, warrant of fitness and certificate of fitness and transport services licensing systems. We need to look back to consider whether we need to intervene and, if so, whether these interventions remain the best or only way to achieve the outcomes sought. This could involve considering any overlaps with other systems, such as the health and safety system. We need to critically question why we do what we currently do, whether it is still needed, or whether there is something more effective we can do. Thinking about the impacts that such regulation is having on businesses and individuals is part of the review process.

Safer Journeys

Vehicle Licensing Reform is focused on exploring opportunities to lower compliance costs while maintaining or improving road safety within the context of a Safe System.

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We are working to understand safety performance across all aspects of the system and how regulatory reform can contribute to Safer Journeys: New Zealand’s road safety strategy 2010-2020. Safer Journeys sets the strategic direction for road safety in New Zealand, identifies priority areas to be addressed, and adopts the Safe System approach.

Encouraging innovation

We face unprecedented levels of technological change, for example, the development of safety technology employed in motor vehicles. In addition, we are seeing considerable change in the way that people purchase goods and services. Credit card payment, direct debit schemes, internet banking and points-based incentive schemes are all being used in bill payment processes. Such payment arrangements can make it easier for people to pay. We need to make sure that we do not stifle these sorts of innovation, but rather take advantage of them in delivering outcomes sought by regulation.

What is the Safe System approach?

This approach aims to create a forgiving road system where a mistake does not result in death or serious injury. Instead of focusing primarily on the road user, improving crash outcomes is also a responsibility for system designers who need to work in partnership to reduce deaths and serious injuries on the roads. The guiding Safe System principles are:

- People make mistakes and crashes are inevitable.
- The human body has a limited ability to withstand crash forces.
- System designers and system users must all share responsibility for managing crash forces to a level that does not result in death or serious injury.

It will take a whole-of-system approach to strengthen all parts of the system.

Regulators might need to give consideration to client-centric compliance approaches. One of the reasons these three systems are being reviewed together is that it may be possible to merge or combine transactions, which would reduce the number of separate transactions individuals and businesses face to make the whole process easier. Would it be possible, for example, to combine the warrant of fitness transaction and the annual vehicle licensing transaction together? This could represent a

much simpler process for vehicle owners, and would lower the compliance costs they face.

We may also be able to assist businesses to make productivity gains. We rarely give businesses the choice about how they should comply with a regulatory requirement. The circumstances of each of the regulated entities can be quite different. Larger trucking businesses may be well placed to self-certify compliance with certificate of fitness requirements because they carry suitably qualified maintenance staff. Smaller businesses are likely to prefer the current system of taking vehicles for regular inspections.

Compliance and enforcement

“One of the central findings from behavioural science is that if you want somebody to do something you should start by making it easy for them to do it. If you want to get people to recycle their household waste, provide them with recycling bins and arrange regular collections. If you want people to pay their tax or fines on time, make it easy for them to do so.”

Applying Behavioural Insights to Reduce Fraud, Error and Debt, p.8., Behavioural Insights Team of the British Cabinet Office, 2012.

We have continued to rely on traditional models of enforcement. For example, the annual vehicle licensing and the warrant of fitness and certificate of fitness systems involve infringement penalties in the event of non-payment. A large number of these are issued every year. The draw back of this approach is that it may be disproportionate in some cases and draws justice sector attention and resources away from crimes against people and property. There is a considerable infrastructure needed to support this enforcement regime and that cost is being largely borne by society as a whole. Once non-payment moves into the infringement penalty regime, the cost is no longer picked up by transport agencies or users, which may weaken the incentives on them for finding more innovative ways of achieving compliance.

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The private sector does not have access to such tools. A commercial approach uses reminders, access to a number of methods of payment, such as direct debit arrangements, and incentives for early payment. There may be room to use more of these techniques to encourage compliance with systems, such as annual vehicle licensing, which involve revenue collection. Of course, even in the private sector, continued non-payment eventually requires court processes.

Questions

1. What is the scope to encourage economic growth by reducing the regulatory burden associated with annual vehicle licensing, warrant of fitness and certificate of fitness and transport services licensing systems?
2. How do these systems stack up against modern views of good regulation?
3. What are the opportunities for innovation? If we were designing these systems from scratch, what might they look like?
4. Do we have the balance right between compliance and enforcement strategies as a way of achieving compliance?

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ANNUAL VEHICLE LICENSING

Current state

The difference between registration and licensing

Registration is a one-off process that identifies a person as legally responsible for a vehicle.

Licensing is the regular (at least) annual process through which revenue is collected, including a payment that contributes to building and maintaining the New Zealand land transport system (through the National Land Transport Fund).

Annual vehicle licensing, commonly known as 'rego', is the process where people who have registered a vehicle under their name pay a number of fees and levies.

The objectives for vehicle licensing (and the initial registration of a vehicle) have evolved over time. The original objective of vehicle registration from the 1900s was to identify the person responsible for a vehicle. It was also used to collect a fee that contributed to the building and maintenance of the roading network. Since 1973, vehicle licensing has been used to collect an ACC levy (see below for details).

At present, the main rationale for vehicle registration is still to identify the person responsible for the vehicle under transport law (the registered person), and the collection of vehicle related data. The main rationale for annual vehicle licensing can be described as:

- using the registered person and vehicle data to collect revenue for transport related expenses and ACC
- providing an opportunity to maintain the contact details of registered persons

Most vehicles are required to be licensed continuously. Continuous licensing means that any unpaid licence fees are recovered when the vehicle is next licensed.

The annual vehicle licensing fee contributes about six to seven percent of the National Land Transport Fund and provides an additional revenue stream beside fuel excise duty and road user charges. The National Land Transport Fund is used to build and maintain New Zealand's land transport system.

The safety standards levy provides for the NZ Transport Agency's work on vehicle-related standards and for the monitoring of standards.

The ACC Motor Vehicle Account levy is the largest proportion of the payment. The account covers claims for injuries involving motor vehicles on public roads in New Zealand. Petrol powered vehicles pay a lower annual ACC levy because ACC is also payable on each litre of petrol.

Registered persons are legally required to inform the NZ Transport Agency about a change of address independently of annual vehicle licensing but the licensing process acts as a reminder for people to check that their address is still correctly recorded in the Motor Vehicle Register. It is important that this information is correct, as it is used for enforcement purposes.

Representative current annual vehicle licensing costs for a passenger car

Cost components	Petrol powered vehicles \$	Diesel powered vehicles \$
Vehicle licensing	43.50	43.50
Safety standards levy	1.64	1.64
Licence label	0.22	0.22
ACC levy	198.46	311.38
Administration & label	6.40	6.40
GST	37.53	54.47
Total	287.75	417.61

* Current as of May 2012

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Strengths and opportunities for improvements

We have identified the following strengths of the annual vehicle licensing system.

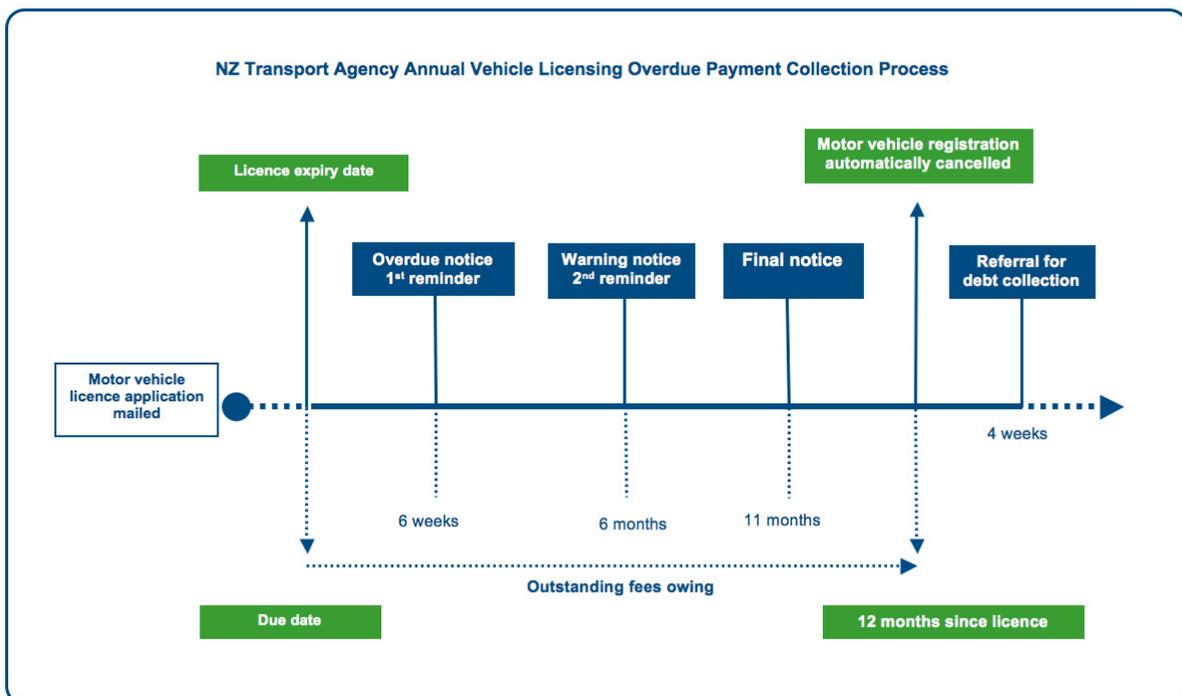
- It is a convenient channel to collect other small levies that benefit road users, ie the vehicle safety standards levy and the transport services licensing fee.
- Revenue compliance of registered vehicles is high at about 98 percent. Revenue compliance means the percentage of licence fees collected within 12 months of the amount being due (ie a vehicle may not have a current licence at any given point but the overdue licence fees are collected within 12 months).
- The process provides a regular contact point with registered persons prompting updates to contact details.

However, we have also identified opportunities for possible improvement, based on our work so far.

- There are a large number of infringement notices issued for unlicensed vehicles even though most vehicle owners end up paying their outstanding licence fees. A significant number of infringement notices are not paid on time and these place a large administrative and cost burden on the justice system. The number of infringements and (eventual) high level of compliance suggests we could do more to encourage vehicle owners to pay on

time. This would reduce their exposure to enforcement action.

- The re-licensing process allows some opportunities for avoidance. For example, a temporary exemption from the annual licensing requirement can be gained when a vehicle owner is not intending to use their vehicle for a continuous period of three months or more. During this time the owner is not required to pay licence fees. However, some vehicle owners may exploit the exemption process to deliberately avoid fee and levy payments, while still using the vehicle on public roads. As roadside inspection rates particularly in more rural areas are low, the risk of being caught are also relatively low.
- The current system could make better use of technology and more efficient processes, which could make them more convenient for customers and less cost-intensive for the NZ Transport Agency (and ultimately the customer).
- There is little public understanding about what the revenue is used for. Feedback suggests that people do not realise they are contributing to the land transport system, and pay for personal injury insurance through vehicle licensing.
- Each fee and levy collected through annual licensing is based on a different set of criteria, which makes the system (and changes to it) complex.



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Questions

- From your perspective (ie agent/customer/etc), what are your views on the annual vehicle licensing process?
- Does the current system work for you, ie is it easy to use?
- What could be done to make the vehicle licensing system and process simpler and easier to use, and encourage customers to comply?
- How could the compliance and enforcement regimes be improved, eg what could be done to increase the number of people paying on time?
- What penalties should apply for non-compliance? Do you think the current infringement fine (up to \$200) for not displaying a current and valid vehicle licence label is appropriate?
- How important is it to maintain a high quality database, particularly for enforcement purposes and how could this be done?

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WARRANT OF FITNESS AND CERTIFICATE OF FITNESS

Current state

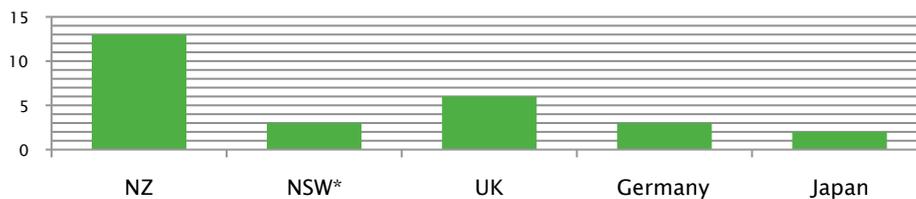
Early analysis of New Zealand's vehicle roadworthiness inspection system suggests that it may not be delivering the best balance between compliance costs and safety benefits. We are taking a system-wide approach to understanding roadworthiness, risk and compliance. A number of levers are available to manage vehicle roadworthiness that need to be explored. There may be an opportunity to reduce costs and inconvenience for vehicle owners and operators while maintaining or improving safety and environmental outcomes.

In New Zealand, we currently have around 7.6 million warrant of fitness and 470,000 certificate of fitness transactions each year. Ours is one of the most frequent vehicle inspection regimes in the OECD.

We think the current system serves the following objectives:

- To help ensure vehicles are operated within minimum safety and environmental roadworthiness standards.
- To give the public confidence that vehicles are safe.
- To provide data for the road user charges regime, the operator rating system and road safety research.
- By default, to provide a benchmark for exiting vehicles from the fleet, ie when repairs become uneconomical.
- By default, to provide a minimum level of consumer protection at time of sale (value).

Comparative roadworthiness inspection frequencies on average over eight years



*NSW requires an e-safety check to vehicles over 5 years of age prior to registration renewal

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Strengths and opportunities for improvements

We have identified the following strengths for the current vehicle certification regime.

- It is well understood by the public.
- The warrant/certificate of fitness label provides a clear point in time compliance check for enforcement.
- It provides a relatively consistent minimum safety check across the vehicle fleet.

Based on our work so far, we have identified the following opportunities for improvement.

- Inspection rigour and frequency could be better matched to risk – there may be an opportunity to decrease compliance costs by better matching inspection frequency, rigour and enforcement to roadworthiness risk.
- Non-compliance could be reduced – there are a large number of vehicles that, at some time, operate outside of the system (ie without WoFs). There may be a number of reasons for this, including, people being unable to afford repairs, complacency, or not understanding their obligations. There is an opportunity to improve compliance by making certification easier, better targeted to risk and better value for money.
- Vehicle maintenance behaviour could be improved – vehicle owners rely too much on having a WoF or CoF instead of taking responsibility for keeping their vehicles in an ongoing roadworthy state. Vehicle owners could be encouraged to maintain the roadworthiness of their vehicles between inspections through targeted advertising, advice and on-road enforcement focused on visible high risk faults such as tyre condition, lights, glazing and modifications – with a greater focus on encouraging spending on maintenance rather than fines.
- Heavy and commercial vehicle compliance may be too one-size-fits-all. It may not sufficiently account for different vehicle types and operations. Allowing a more scalable regime, possibly with variable frequency and self-inspection options for accredited operators could decrease compliance costs and allow possible productivity improvements.

Questions

- Would introducing a simpler inspection test for younger vehicles and a more rigorous test for older vehicles help with better matching inspection rigour to risk?
- How important is vehicle age in inspection frequency?
- How workable is on-road enforcement targeted at visible high risk faults – tyre condition, lights, glazing and modifications?
- How can we best encourage greater owner/operator responsibility and safe vehicle maintenance behaviour? Would introducing re-test fees and making greater use of infringement waivers help?
- Do new vehicles being serviced under manufacturer warranties need a warrant of fitness? Could something other than a warrant of fitness be applied to vehicles being serviced under approved maintenance contracts?
- How can commercial vehicle productivity be improved? What are the possible benefits and risks of allowing variable frequency self-inspection for accredited commercial operators?

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CASE STUDY: National Heavy Vehicle Accreditation Scheme (NHVAS), Australia

In the road transport context, traditional regulatory responses have been enforcement, rather than compliance orientated. They have also tended to be almost exclusively reliant on the physical detection and prosecution of offenders and on increasing the maximum fines.

Accreditation has evolved as a formal process for recognising operators who have good safety and other management systems in place.

NHVAS was first offered to industry in 1999 as an alternative compliance scheme. Accredited participants in NHVAS who can demonstrate that they are meeting systems management standards are subject to less enforcement activity, and have access to other benefits. At present, there are four modules for which accreditation can be granted, and for which there are corresponding benefits. Examples follow.

- **Mass Management** which provides access to additional mass concessions, allowing vehicles to operate at Concessional Mass Limits for general access to the road network.
- **Basic Fatigue Management** which offers more flexible hours and provides operators a greater say in when they can work and rest, providing the risks of working long and night hours are properly managed.
- **Maintenance Management** which consists of vehicle component maintenance standards and an audit matrix that provides regulatory flexibility for providing compliance with an operator's work programme.

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TRANSPORT SERVICES LICENSING

Current state

In New Zealand, many transport services are required to be licensed before they can operate.

The transport services licensing (TSL) system originated in the 1930s, and was initially a means of economic control and railway business protection. Changes in the 1980s removed the rail protection requirements and initiated a qualitative basis for licensing.

In its current form, the TSL system serves to provide a framework that supports a range of outcomes. These outcomes include road safety, personal security, fair competition between commercial transport operators, consumer protection and driver security. The mechanisms by which these outcomes are supported vary considerably across the various transport services that are regulated.

Transport services licensing in New Zealand

- There are now four types of transport service that must be licensed.
 - Goods Services (eg trucks)
 - Passenger Services (Large Passenger eg buses, Small Passenger eg taxis, shuttles)
 - Vehicle Recovery Services eg tow-trucks
 - Vehicle Rental Services
- There are around 37,000 active licences, the holders of which operate around 150,000 vehicles.
- There are 2500 applications per annum for transport services licences.

Strengths and opportunities for improvements

We have identified the following strengths with the current transport services licensing system.

- The system provides a way to manage entry into various transport industries.
- It provides a mechanism to target requirements to specific segments of the transport industry.
- It is (generally) well understood by the industry.

“In most OECD countries, operator licences are required for hire and reward operators [of freight services]...However in the United Kingdom, Spain, Canada and New Zealand, [non-hire and reward] operators must also obtain a licence or permit to operate their fleet.”

Moving Freight with Better Trucks, OECD/ITF 2011

However, we have also identified opportunities for possible improvement, based on our work so far.

- The effectiveness of the TSL system is difficult to measure and it may only be partially effective in achieving its original objectives.
- While the system is designed to regulate participation in the industry, it is difficult and costly to remove bad operators and ensure they do not re-enter the industry.
- Compliance costs are not aligned with either the harms or risks. That is, the system imposes a largely generic cost structure on all participants. However, not all participants represent the same levels of harm or risk to the public or the transport system.
- Some requirements, such as those that relate to small passenger vehicles, may restrict innovation or dissuade some parties from participating.
- There may be areas of duplication between the TSL system and other regulatory regimes such as the driver licensing system, or in other areas of regulation such as consumer protection, workplace safety and health and crime.

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Questions

- What issues led government to impose the transport services licensing (TSL) system on the commercial transport sector?
- To what extent are those reasons still relevant? What should be the primary goal of the TSL system be?
- What benefit does the current TSL system provide for your sector?
- What issues do you think exist with the current TSL system?
- Are there any unnecessary overlaps between the TSL system and other regulatory requirements such as the requirement for certificates of fitness?
- How can transport industry sectors play a role in managing their own sector?
- How can compliance be encouraged rather than penalising non-compliance?

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