

Submission on the Land Transport Rule: Seatbelts and Seatbelt Anchorages 2002

Proposed rule change to permit seatbelt re-webbing by approved specialist companies

Date: September 2026

Subject: Amendment of the Seatbelts and Seatbelt Anchorages Rule to recognise approved seatbelt re-webbing

Executive summary

VIA submits that the Land Transport Rule: Seatbelts and Seatbelt Anchorages 2002 should be amended to permit the re-webbing of seatbelts by companies specifically approved by NZTA for that purpose. The present Rule treats re-webbing as a repair that may be undertaken only by the original seatbelt manufacturer or its authorised agent. Because there are no mass-manufacturers or their agents undertaking such repairs in New Zealand, NZTA has established an exemption regime under which specialist companies may re-web seatbelts manufactured by others, subject to strict conditions.

The exemption regime has operated for several years and indicates that safe, traceable and verifiable re-webbing can be delivered by approved specialists under controlled conditions. Industry participants report that exemption numbers are issued in limited parcels of no more than 500 at a time and that, for some providers, a parcel may last only about five weeks. VIA submits that this recurring administration does not add a corresponding safety benefit. Where NZTA has repeatedly authorised the same activity under controlled conditions, the Rule should be aligned with that regulatory practice.

VIA therefore recommends a permanent approval pathway in the Rule for competent seatbelt re-webbing companies, supported by auditable technical, quality-assurance, identification and record-keeping requirements. This would retain NZTA oversight, preserve safety outcomes and remove the need for repetitive transaction-level exemptions.

1. Purpose of this submission

This submission seeks an amendment to the Rule so that re-webbing performed by an NZTA-approved specialist provider is expressly lawful without a separate exemption for each seatbelt or finite batch of seatbelts.

2. Current regulatory position

The Rule is intended to ensure that seatbelts are safely fitted, maintained and anchored so that they function effectively in a crash. Its modification and repair provisions have the practical effect that a seatbelt may be repaired only by its manufacturer or an authorised agent. NZTA guidance treats re-webbing as a repair and states that no mass manufacturers or their agents currently repair seatbelts in New Zealand.

To address that market reality, NZTA has granted exemptions under strict conditions to specialist providers. Current NZTA guidance lists:

- APV Australia, Autosafe Ltd, Belt Tech NZ Ltd, Seatbelts NZ Ltd and Seatbelt Manufacturers NZ Ltd,

while noting that further companies may be added as approved. A compliant re-webbed belt must carry an exemption-number label and be supported by an exemption letter or an approved electronic verification method.

3. The problem with the present approach

- **The Rule does not reflect established practice.** NZTA has repeatedly sanctioned re-webbing by approved specialist companies, demonstrating that the activity can be carried out safely outside the original manufacturer or authorised-agent model.
- **The exemption process is repetitive rather than risk based.** Industry participants report that exemption numbers must be obtained in parcels of no more than 500. For a busy provider, a parcel may last approximately five weeks, requiring frequent repeat applications or purchases.
- **The burden does not appear proportionate to the risk.** Once a business, its processes and its quality controls have been assessed and approved, repeatedly issuing limited blocks of numbers does not materially strengthen the technical integrity of each repair.
- **The regime creates avoidable cost and delay.** Administration is imposed on approved businesses and NZTA alike, with the potential for interruptions when a number allocation is exhausted.
- **The present drafting may discourage lawful repair.** An unnecessarily cumbersome approval mechanism can make compliant repair less accessible and may encourage vehicle owners to source second-hand or unverified alternatives.

4. Proposed rule amendment

VIA recommends that the Rule's repair and modification provisions be amended in substance as follows:

Proposed provision

A seatbelt may be re-webbed by a person or organisation approved by the Director for that purpose, provided that the re-webbing is performed in accordance with the conditions of approval, applicable technical specifications, quality-assurance requirements, identification and traceability requirements, and any inspection or record-keeping requirements specified by the Director.

A seatbelt re-webbed in accordance with this provision is treated as complying with the repair and replacement requirements of this Rule and does not require a separate vehicle-specific or seatbelt-specific exemption.

Consequential definitions should be added for “approved seatbelt re-webber” and “re-webbing”, and section 5 should make each approved provider responsible for compliance with its approval conditions. The final drafting should be settled by NZTA's legal team while preserving the policy effect above.

5. Recommended approval framework

- Initial technical assessment and approval by NZTA, with approval attached to the provider rather than to finite parcels of individual transactions.
- Documented competency requirements for staff performing re-webbing and final inspection.
- Use of webbing, thread, hardware and stitching specifications shown to be suitable for the relevant belt design and performance requirements.
- A controlled quality-management system covering incoming inspection, repair instructions, equipment calibration, final inspection and release.
- Unique, durable identification on every re-webbed belt, including the approved provider and a serial or job number.
- A searchable electronic record linked to the vehicle registration or VIN where available, supported by an exemption or compliance letter where electronic verification is unavailable.
- Retention of repair records for a specified period and ready access for NZTA audit.

- Periodic audit, renewal or surveillance proportionate to provider performance, together with powers to impose conditions, suspend or revoke approval, and require corrective action.
- Clear exclusions for assemblies that cannot be safely re-webbed, including components whose pretensioners, load limiters, retractors, buckles or other safety-critical parts are damaged or outside approved repair scope.

6. Safety case

The proposal does not seek to relax safety standards or permit unrestricted repair. It seeks to replace repeated exemptions with a transparent approval regime that embeds the same or stronger controls in the Rule. NZTA's existing guidance already distinguishes compliant re-webbing by approved providers from unapproved activity and provides inspection staff with methods for verifying the work.

The sustained use of exemptions indicates that NZTA considers re-webbing potentially acceptable when carried out by assessed providers under strict conditions. VIA recommends that NZTA review its exemption, audit, complaint, failure and enforcement records to establish the safety performance of approved providers and publish the resulting evidence alongside any rule proposal. If those records identify shortcomings, the approval conditions can be strengthened directly rather than retaining an administratively inefficient exemption mechanism.

7. Benefits of the proposed change

- **Improved regulatory coherence:** the Rule would match the activity NZTA already authorises.
- **Maintained or enhanced safety:** formal provider approval, traceability and audit requirements would continue to protect vehicle occupants.
- **Reduced administrative cost:** approved providers and NZTA would no longer need to process repeated blocks of exemption numbers.
- **Better service continuity:** compliant re-webbing would not be interrupted by exhaustion of a finite number allocation.
- **Consumer benefit:** safe repair can be more affordable and practical than replacement with a new original-equipment assembly, where available.
- **Waste reduction:** serviceable mechanisms and hardware can remain in use where they pass inspection, avoiding unnecessary disposal while ensuring worn or damaged webbing is replaced.

8. Implementation and transition

Existing exempted providers should be deemed provisionally approved for a defined transition period, subject to confirmation that they continue to meet their current conditions. During that period, NZTA should finalise approval criteria, audit arrangements, a public register and VIRM changes. Existing exemption labels and records should remain valid, and inspection guidance should clearly explain how belts completed before and after commencement are verified.

9. Requested action

VIA asks NZTA to:

1. agree in principle that approved re-webbing should be expressly provided for in the Rule;
2. commence a targeted rule amendment and associated VIRM update;
3. consult current approved providers, vehicle inspectors, low volume vehicle specialists and affected industry bodies on the technical approval criteria;
4. replace finite exemption-number parcels with a provider-based approval and unique traceability system; and
5. publish the evidence and risk assessment supporting the final framework.

10. Conclusion

The need for repeated exemptions is a sign that the Rule has not kept pace with a safe and established specialist service. NZTA has already recognised that approved re-webbing can be undertaken safely under controlled conditions. The appropriate response is now to place that approval pathway in the Rule, preserve robust oversight and remove an unnecessary recurring administrative process. VIA would welcome the opportunity to work with NZTA and current providers on the detailed drafting and implementation requirements.