



# Special Interest Vehicle Entry Reform

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*Recognising commercially manufactured low-volume vehicles and modernising the Special Interest Vehicle regime*

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Imported Motor Vehicle Industry Association (VIA)  
Submission to the New Zealand Transport Agency  
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- **Recognise credible regulatory approval where it exists.**
- **Reserve exemptions for vehicles that genuinely cannot demonstrate compliance.**
- **Ensure that the Special Interest Vehicle regime remains proportionate and fit for purpose.**

## Executive summary

VIA began this work after an industry member asked it to examine New Zealand's treatment of commercially manufactured specialist vehicles produced in low volumes. The proposal is deliberately manufacturer neutral. Morgan vehicles are used only as an illustrative case study because they provide a practical example of the evidential and regulatory issues involved. The proposed framework must apply consistently across the Morgan Plus Four, Morgan Plus Six, and other current or future models, as well as to vehicles produced by other low-volume manufacturers.

The relevant distinction is not between particular brands or model names. It is between vehicles manufactured commercially to repeatable specifications, with professional engineering, controlled factory processes, technical documentation, and recognised overseas approval, and one-off scratch-built vehicles, privately assembled kit cars, hobby constructions, or other vehicles outside recognised commercial manufacturing systems. References to different Morgan models illustrate the consistency of factory manufacture and professional standards across a model range; they do not form the basis for a manufacturer-specific concession.



Figure 1: Morgan Plus Six (source: [morgan-motor.com](https://morgan-motor.com))

The investigation identified two related but separate issues. First, New Zealand does not appear to have a clear, published process for translating credible overseas whole-vehicle approval into findings against each applicable New Zealand Rule. A 2026 Morgan Certificate of Conformity provides a practical illustration. It links a specific M1 vehicle and VIN to an EC small-series type approval and records detailed construction, mass, powertrain, emissions, noise, and equipment information. It therefore provides strong evidence of vehicle identity and conformity with an approved type, although the approval certificate, information package, and supporting technical material remain necessary to determine precisely which New Zealand requirements have been demonstrated.

Second, VIA's review of the Special Interest Vehicle, or SIV, regime identified questions about whether some inherited controls remain necessary, proportionate, and well targeted. The available historical, Official Information Act, and operational material does not establish every original policy rationale conclusively. It does, however, provide a sound basis for reviewing settings that have not been substantively revisited since their introduction and for ensuring that present controls are directed to demonstrable safety, environmental, and scheme-integrity risks.

Two questions should therefore be considered separately:

1. Should a commercially manufactured low-volume vehicle require an SIV exemption where credible overseas approval evidence can demonstrate compliance or an acceptable equivalent outcome?
2. Where an SIV exemption is genuinely required, are the current SIV settings proportionate, transparent, and fit for purpose?

VIA recommends two coordinated but independent workstreams:

- **Workstream 1 — Overseas Low-Volume Approval Recognition:** Establish a formal process for assessing and recognising credible overseas approval systems that apply to commercially manufactured low-volume vehicles.
- **Workstream 2 — SIV Modernisation:** Retain SIV as a controlled standards-exemption pathway, while reviewing the four-year ownership restriction, permit frequency, transfer and hardship arrangements, the age-20 anomaly, and administrative transparency.

The workstreams should not be contingent on one another. Recognition of credible overseas approval should proceed wherever the evidence supports it, without waiting for a full SIV review. Equally, the SIV regime should be modernised for vehicles that genuinely continue to require an exemption, regardless of the outcome of the recognition workstream.

What VIA is asking NZTA to do

1. Agree in principle that, where a commercially manufactured low-volume vehicle is covered by credible overseas governmental or government-recognised whole-vehicle approval, NZTA should identify what that approval demonstrably proves, map the evidence to the corresponding New Zealand requirements, and seek additional evidence, targeted certification, or an exemption only for a genuine residual gap.
2. Establish a joint policy and technical workstream with VIA and relevant technical stakeholders to design an Overseas Low-Volume Approval Recognition Framework and a register of recognised approval systems or approval categories.
3. Use a UK or EU low-volume type-approval pathway, with a Morgan vehicle as an initial illustrative case study, while ensuring that the resulting framework is manufacturer-neutral and capable of applying to other recognised systems and manufacturers.
4. Undertake a targeted review of the SIV regime (see Appendix A).
5. As part of that review, evaluate the impact of a two-year ownership-retention period (noting the background documents refer to a two or three year option, not four).
6. Review the current two-year restriction between individuals applying for SIV permits and identify the evidence and policy basis for that restriction, including whether a less restrictive frequency control would adequately manage scheme-integrity risk.
7. Test ownership, permit-frequency, quota, one-at-a-time ownership, and transfer controls against the actual integrity risks of scale, arbitrage, and circumvention of ordinary standards requirements, rather than simply treating commercial activity as the harm to be avoided.
8. Consider an age-20 taper, a transparent transfer and hardship pathway, and improved publication of eligibility and administrative guidance.

9. Confirm which changes can be implemented administratively, and which require amendments to Land Transport Rules or other legislation.
10. Frame both workstreams as regulatory-stewardship exercises that preserve safety and environmental outcomes while avoiding unnecessary duplication, recognising credible international systems, supporting competition, and reviewing inherited controls that may no longer be justified.

## What VIA is not asking for

- Automatic acceptance of every overseas low-volume or individual approval.
- A blanket exemption from New Zealand entry certification, condition, registration, biosecurity, Customs, left-hand-drive or other applicable requirements.
- Automatic extension of system-level recognition to individual or IVA-style approvals; these remain vehicle-specific and should continue through the appropriate individual assessment or LVV pathway.
- A new pathway for amateur-built vehicles, privately assembled kit cars, hobby constructions or replicas outside recognised commercial manufacturing systems.
- A lowering of New Zealand safety or environmental outcomes.
- Abolition of the SIV regime. VIA considers that SIV remains necessary where compliance cannot otherwise be demonstrated and an exemption is justified.

## 1. How this issue arose

**The starting question was practical rather than theoretical.** An industry member asked VIA to examine the regulatory treatment of commercially manufactured specialist vehicles produced in low volumes. The concern was that a vehicle can be designed and manufactured by an established commercial producer, built repeatedly to a controlled specification, supported by professional engineering and formal overseas approval, yet still fall outside the conventional New Zealand evidence pathways used for mass-produced vehicles.

The background work was deliberately narrowed to commercially manufactured vehicles. It does not seek to change the treatment of amateur-built or scratch-built vehicles, privately assembled kit cars, or replicas produced outside recognised manufacturing systems. That distinction was confirmed during VIA's internal technical work.

**Morgan provides a useful illustration, but the issue is not manufacturer specific.** The background material identifies a broader class of commercially manufactured low-volume vehicles, including models produced by Caterham, BAC, Ariel, Radical, Ginetta, Donkervoort, Koenigsegg, Pagani, and Morgan. The relevant feature is not the brand or model designation. It is professional manufacture to repeatable specifications, supported by technical documentation, consistent factory processes, and approval through a recognised regulatory system. References in this paper to the Morgan Plus Four and Morgan Plus Six illustrate the same regulatory issue across vehicles produced to consistent professional and factory standards. They do not confine the proposed framework to either model or to Morgan.

## 2. What the investigation found

The investigation identified two connected but distinct policy questions. The first concerns the treatment of credible overseas approval evidence for commercially manufactured low-volume vehicles. The second concerns the design of the SIV regime where an exemption remains necessary. Keeping those questions separate is important: a vehicle should not be directed into SIV merely because its approval pathway is unfamiliar, and the continuing need for SIV does not remove the case for reviewing its inherited settings.

## 2.1 Path one – a recognition gap for commercial low-volume vehicles

The current framework can create an awkward outcome. A scratch-built or substantially modified vehicle may be able to demonstrate its acceptability through New Zealand's LVV framework. A mass-produced vehicle may rely on recognised standards and conventional type-approval evidence. But a vehicle sitting between those categories – commercially manufactured in small numbers under a recognised overseas low-volume approval system – may have no clear equivalent recognition pathway.

The draft low-volume work identifies the result as a regulatory distinction based more on the form and jurisdiction of the approval pathway than on the engineering outcome. VIA considers that this is the wrong starting point. The first question should be whether credible evidence already demonstrates compliance or an equivalent regulatory outcome.

**A vehicle should not require an exemption merely because its approval pathway is unfamiliar. The regulator should first ask what the overseas approval proves.**

## 2.2 Path two – the SIV regime itself warrants review

While considering why these vehicles were being directed into SIV, VIA reviewed the history and operation of the SIV regime itself. That work found a separate set of issues.

- The Ministry's response OC260612 shows that the original drafting instructions contemplated ownership retention without specifying a duration, later policy material proposed three years, and the final 2008 Rule adopted four years. The Ministry located no document explaining that final change and confirmed it has not reviewed the requirement since introduction. Some historical records may have been lost after the 2016 Statistics House collapse, so the correct conclusion is that no rationale was located—not that none ever existed.
- The Ministry advised through the OIA material summarised in VIA's research that it had not reviewed the four-year requirement since its introduction in 2008.
- NZTA reported no records of investigations, warnings, prosecutions or other enforcement activity concerning SIV conditions. It also identified 54 SIV vehicles first registered from 1 January 2021 that changed registered person within four years. NZTA could not determine from the extracted data whether those changes were lawful, approved, administrative or breaches. The figure therefore identifies an evidence gap; it is not proof of widespread non-compliance.
- The annual quota of 200 permits has never been reached. Grants fell from 99 in 2021 to 48 in 2025; 7 permits had been granted by 9 July 2026. Applications, grants and declines should be reported together because grant figures alone do not distinguish falling demand from tighter eligibility decisions.
- The closely related Category A left-hand-drive regime contains an age-20 taper that the SIV regime lacks.
- The current two-year restriction between SIV permits appears materially more restrictive than an earlier policy-development formulation based on imports during the preceding 12 months, and the rationale for the present setting has not been identified in the material reviewed.

Those findings do not support abolishing SIV. They support a narrower proposition: where SIV is genuinely required, its controls should be evidence-based, proportionate and directed at the risks the regime is intended to manage. This is also a regulatory-stewardship issue. Current government expectations require agencies to monitor and review regulatory systems rather than adopt a "set and forget" approach, and the Regulatory Standards Act 2025 now places proactive stewardship and review responsibilities on agencies. VIA's proposed review therefore aligns with contemporary expectations of proportionate, efficient and regularly reviewed regulation.

### 3. A clearer regulatory model

VIA proposes that the entry framework distinguish three materially different situations:

| Vehicle circumstance                                                                           | Appropriate regulatory response                                                                                                                                                      |
|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Conventional mass-production vehicle with recognised compliance evidence                       | Normal entry certification using recognised standards and approval evidence.                                                                                                         |
| Commercially manufactured low-volume vehicle with credible overseas regulatory approval        | Assess and recognise the overseas approval where it demonstrates equivalent or acceptable outcomes <sup>1</sup> ; require only targeted evidence for any identified New Zealand gap. |
| Individually constructed, substantially modified or genuinely non-compliant specialist vehicle | Use the appropriate New Zealand certification or exemption pathway, including LVV or SIV where applicable.                                                                           |

This model does not create a hierarchy of “better” or “worse” vehicles. It matches the regulatory response to the evidence available. Where credible compliance evidence exists, it should be assessed. Where a technical difference is identified that difference should be addressed. Where compliance cannot be demonstrated, an exemption remains available as the exceptional mechanism.

**Recognised evidence → equivalence assessment where necessary → targeted assessment of identified gaps → exemption only where compliance cannot otherwise be demonstrated.**

### 4. Workstream 1 – Overseas Low-Volume Approval Recognition

VIA recommends that NZTA establish a formal framework for assessing overseas low-volume approval systems applying to commercially manufactured vehicles. Recognition should attach to an assessed approval system and category, with vehicle-level proof that the individual vehicle falls within that approval. The framework should distinguish overseas approval, acceptable evidence, equivalence and exemption: an approval identifies the regulatory assessment undertaken; evidence connects that assessment to the vehicle and New Zealand requirement; equivalence addresses any materially different requirement; and an exemption remains necessary only where compliance cannot otherwise be demonstrated. Individual or IVA-style approvals should not receive automatic system-level recognition because their evidential scope is vehicle-specific.

#### 4.1 Proposed recognition criteria

An overseas approval should be capable of recognition where NZTA is satisfied that the relevant system provides an adequate combination of:

- governmental or government-recognised regulatory authority;
- defined technical requirements;

<sup>1</sup> For some commercially manufactured low-volume vehicles, direct compliance testing against a requirement such as frontal impact may be disproportionately costly because it requires a vehicle-destroying test. That does not remove the need for regulatory assurance. It means that the relevant assessment may depend on the approval system's engineering requirements, design controls, technical evidence, and any alternative provisions accepted by the overseas approval authority. NZTA's task is to assess whether that evidence provides an acceptable basis for the corresponding New Zealand requirement.

- professional engineering assessment;
- inspection, testing or verification appropriate to the approval category;
- vehicle and approval traceability, including VIN or approval-number linkage;
- formal approval documentation, including the approval certificate and a Certificate of Conformity or equivalent construction-conformity document containing the jurisdictional approval number;
- production controls or other mechanisms that provide confidence that vehicles presented for entry conform to the approved specification;
- a means of identifying material differences between the overseas requirements and the corresponding New Zealand requirements.

Recognition need not be binary. Some approval categories may be capable of direct recognition once their technical basis is established. Others may require an equivalence assessment, additional evidence, or targeted certification against a specific New Zealand requirement.

## 4.2 Safeguards

- Recognition should apply only where the vehicle can be positively linked to the approval documentation.
- The vehicle must remain materially consistent with the approved specification.
- NZTA should retain discretion to seek further evidence where documents are incomplete or where significant post-approval modification has occurred.
- Recognition of the overseas approval would not remove unrelated New Zealand requirements such as entry certification, condition requirements, registration, biosecurity, Customs or left-hand-drive requirements.
- The recognition register should be reviewable so approval systems can be added, amended, suspended or removed as overseas frameworks change.
- Independent importers should not be required to obtain discretionary manufacturer confirmation where the same matter can be reliably proved through approval-authority records, approval certificates, Certificates of Conformity, VIN-linked data, component markings or technical-service reports.

## 4.3 Proposed pilot

VIA suggests developing the framework through one or more concrete case studies. A current EC small-series approval and an actual Morgan vehicle provide a practical starting point because they turn the recognition question into a testable evidential record. The 2026 Certificate of Conformity reviewed for a Morgan Plus Six SuperSport demonstrates the documentary architecture available for a commercially manufactured low-volume vehicle.

The pilot should place side by side the approval number and certificate, Certificate of Conformity, VIN connection, applicable overseas requirements, corresponding New Zealand Rules, and NZTA's assessment of each item. Each requirement should then be classified as fully evidenced, technically aligned but requiring further documentary proof, subject to a materially different alternative requirement, or a genuine New Zealand-specific gap. Additional evidence, testing, or exemption should be confined to any residual gap.

The same method should be capable of application to the Morgan Plus Four, the Morgan Plus Six, or another commercially manufactured low-volume model where equivalent professional manufacturing controls and regulatory evidence are available. The case study is therefore a means of testing the framework, not a proposal for model-specific treatment.

#### 4.4 What the supplied Morgan Certificate of Conformity establishes

The supplied document is an EC Certificate of Conformity for a complete vehicle type-approved in small series. It identifies a Morgan Plus Six SuperSport, type LP23, variant B, version CA19SPC, vehicle category M1, manufactured on 20 January 2026, and links its VIN to approval e9\*KS18/858\*11350\*06, granted on 30 July 2025. It states that the vehicle conforms in all respects to the approved type and may be permanently registered in EU Member States, subject to the traffic-side and instrument-unit entries shown on the certificate.

The certificate also records substantial vehicle-level data, including dimensions, axle and laden masses, BMW B58B30C powertrain, tyre configurations, ECE R51.03 sound results, Euro 6e-bis-FCM emissions status, the applicable emissions regulatory act, WLTP fuel-consumption and CO2 results, and equipment declarations. This materially advances the identity, traceability and construction-conformity parts of the proposed recognition test.

The Certificate of Conformity establishes a strong vehicle-to-approved-type evidence chain. It does not reproduce the full approval certificate, information package, standards matrix, alternative requirements, or supporting test material. A complete New Zealand equivalence decision would therefore require those documents. This limitation does not weaken the case for recognition; it identifies the focused evidence needed to assess the approval properly and to isolate any genuine New Zealand-specific gap.

The Certificate of Conformity records that the vehicle was not certified under UN Regulations 155 and 156. That entry should be read in the context of the staged and scope-dependent application of cybersecurity and software-update requirements to small-series vehicles. The vehicle was manufactured on 20 January 2026 under an approval granted on 30 July 2025. The record therefore does not, by itself, establish a deficiency in the vehicle's approval. Any New Zealand relevance should be assessed against the applicable approval scope, dates, and corresponding domestic requirements.

**Relevant prior NZTA material supports the proposed pilot.** Correspondence dated 22 September 2021 concerning Morgan vehicles described the potentially outstanding matters as generally minor or administrative, including interior impact, steering, brakes, seatbelt anchorages, door retention and, depending on the evidence and vehicle configuration, frontal impact. The correspondence also indicated that an exemption would not be required where compliance could be demonstrated by other documentation; that approval markings could be inspected for lamps, mirrors, tyres, glazing and seatbelts; and that LVV certification would not be required unless the vehicle had been modified. Although the original record should remain the authoritative source for any detailed technical conclusion, the material supports an evidence-translation pilot rather than blanket acceptance or rejection.

## 5. Workstream 2 – Modernise the SIV regime

The SIV pathway should remain available as a controlled exemption mechanism. The objective of reform should be to improve its calibration, transparency and internal coherence, not to turn it into a general alternative import pathway. Commercial activity is not itself the policy harm; the relevant risks are scale, arbitrage and use of the concession to bypass normal standards. Ownership retention, permit frequency, quota and transfer restrictions should therefore be assessed against those risks.

VIA's OIA request produced substantial historical material on the development of the policy. The available record is not necessarily complete because some Ministry of Transport files may have been lost following damage to Statistics House in the 2016 Kaikōura earthquake. The submission therefore distinguishes between the absence of a located rationale and proof that no rationale ever existed.

## 5.1 Ownership retention

The available historical material shows that early drafting instructions contemplated ownership retention without specifying a period, January 2006 policy material proposed three years, and the final 2008 Rule adopted four years. The Ministry did not locate material explaining the final change and noted that some historical records may have been lost after the 2016 Statistics House collapse. The appropriate conclusion is not that a rationale never existed, but that the currently available record does not establish one. That is sufficient reason to review whether the present four-year period remains proportionate in light of the regime's current objectives and evidence.

VIA considers two years the preferred option for formal evaluation. It would still deter immediate import-and-resale activity while materially reducing the period during which a legitimate owner is locked into ownership. This is a policy judgement, not an empirically proven optimum. NZTA should compare the status quo, three years (the strongest documented historical comparator), two years, and a shorter period or taper, using transfer outcomes and evidence of actual circumvention. Any retention control should also include an approval-based transfer and hardship mechanism.

## 5.2 Permit frequency

Current NZTA guidance requires an applicant not to have received an SIV permit in the previous two years and not to have another SIV registered in their name. Historical material released under OC260612 proposed a different formulation: no more than one qualifying import during the preceding 12 months. The available record does not explain the move to the present, more restrictive combination. That evidential gap supports a review of whether the controls remain necessary and proportionate when considered alongside the annual quota, individual assessment and ownership-retention requirements.

Permit frequency and the one-at-a-time ownership condition directly manage repeated access to the concession. NZTA should assess them as a package with the annual quota and retention period. The policy question is whether all controls remain necessary at their present settings when applications are individually assessed and utilisation is well below the cap. VIA recommends testing an annual permit limit, supported by the one-at-a-time condition, against the current two-year bar.

## 5.3 Other priority SIV reforms

- Age-20 taper: align SIV with the operational approach used for Category A left-hand-drive vehicles, so the registration restriction ends after four years or when the vehicle reaches 20 years of age, whichever occurs first. The legal mechanism and interaction with each standards exemption must be confirmed before lodgement.
- Transfer mechanism: allow transfer during the restricted period to a person who independently meets the relevant eligibility requirements and accepts the remaining permit conditions.
- Hardship and variation pathway: publish clear criteria for circumstances such as death, estate administration, incapacity, emigration, relationship-property settlement, trust or company restructuring, and demonstrated financial hardship.
- Eligibility transparency: revisit the model-level eligibility register contemplated during the original policy development, or otherwise improve published guidance and predictability.
- Administrative transparency: publish permit statistics, exemption and review pathways, and consistent current guidance.

## 6. How the two workstreams fit together

The workstreams solve different problems and should be kept conceptually separate.

| Question                                                               | Workstream                               | Policy outcome                                                                |
|------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------------------------|
| Does credible overseas approval evidence already exist?                | Overseas Low-Volume Approval Recognition | Use recognised evidence where it is adequate; certify only identified gaps.   |
| If compliance still cannot be demonstrated, is an exemption justified? | SIV pathway                              | SIV remains available as the exceptional entry mechanism.                     |
| If SIV is used, are its conditions proportionate and well targeted?    | SIV Modernisation                        | Modernise ownership, frequency, transfer, hardship and transparency settings. |

VIA is not seeking easier access for specialist vehicles. The recognition workstream is intended to ensure that credible evidence is assessed efficiently and consistently. The SIV modernisation workstream is intended to preserve a controlled exemption pathway for cases in which an exemption remains justified, while ensuring that its conditions remain proportionate, transparent, and directed to genuine scheme-integrity risks.

## 7. Proposed next steps with NZTA

1. Hold an initial policy/technical workshop with VIA to confirm the problem definition and identify the relevant NZTA teams.
2. Select one or two overseas approval categories and real vehicles for a structured equivalence pilot.
3. Map the overseas approval evidence against the specific New Zealand prescribed standards that currently create an entry barrier.
4. Identify the legal mechanism required for recognition: acceptable evidence guidance, VIRM changes, Rule amendments, or a combination.
5. In parallel, commence a targeted SIV settings review using the OIA evidence and reform options in Appendix A.
6. Agree a short work programme, with issues separated into administrative improvements that can be delivered quickly and policy/Rule changes requiring a longer process.

VIA is willing to provide industry examples, technical documentation and access to specialist importers and manufacturers to support both workstreams.

## 8. Conclusion

The work that began with a question about commercially manufactured specialist vehicles has identified two practical opportunities for regulatory improvement. New Zealand can make better use of credible overseas approval evidence for professionally manufactured low-volume vehicles while retaining SIV as a genuine exemption pathway for vehicles that cannot otherwise demonstrate compliance. At the same time, the SIV settings can be reviewed so that inherited controls remain proportionate, transparent, and directed to demonstrable risks.

VIA proposes that NZTA progress the two workstreams in parallel. Neither requires New Zealand to lower its standards. Together, they would support a more coherent and efficient application of those standards: recognising credible evidence where it exists, addressing genuine gaps where they arise, and retaining exemptions only where they remain necessary.



## Appendix A – SIV regime: evidence and reform case

### A.1 Purpose

This appendix is based on a longer research paper that can be made available on request.

### A.2 Current SIV controls relevant to this review

| Control               | Current setting identified in VIA research                                                                                                                                                                                                                                                                       |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Annual quota          | Up to 200 SIV permits per calendar year.                                                                                                                                                                                                                                                                         |
| Vehicle age           | The pathway primarily concerns eligible vehicles under 20 years old; separate age-based exemptions apply at 20 years for relevant standards.                                                                                                                                                                     |
| Applicant frequency   | Applicant must not have received an SIV permit within the preceding two years and must not have another SIV registered in their name.                                                                                                                                                                            |
| Ownership             | Current operational guidance requires the vehicle to remain registered in the permit holder's name for at least four years after first New Zealand registration where the permit addresses frontal impact, emissions and/or ESC. Exact Rule, exemption and permit wording must be mapped before final lodgement. |
| Personal-use controls | Applicant requirements include personal ownership/use and access to another vehicle for ordinary transport.                                                                                                                                                                                                      |

### A.3 Original policy problem

A review of historical Ministry and Agency material indicates that the original concern was to provide access for genuine enthusiast and collectable vehicles while preventing the concession from becoming a high-volume bypass for cheaper non-complying vehicles. Commercialisation was understandably seen as relevant because it could drive scale, arbitrage and circumvention of normal standards requirements.

An unduly broad focus on “anti-commercialisation” risks treating legitimate business activity as a policy harm in itself. The Ministry and NZTA should instead focus on vehicle standards, road safety and the integrity of the concession. Commercial activity is relevant only where it creates scale, arbitrage or circumvention risks that the regulatory settings are intended to address.

Any revised policy should not treat commercial motive as a harm in itself. The relevant risks are whether use of the pathway undermines vehicle eligibility, permit-frequency controls, fleet-volume limits, transparency or the integrity of the standards framework.

### A.4 Four-year ownership period

- Initial drafting instructions contemplated an ownership-retention condition but did not specify a duration.
- January 2006 policy-development material proposed a three-year ownership-retention period.
- The final 2008 rule used four years.
- The Ministry located no document explaining the change from three years to four years; it cautioned that some historic records may have been lost after the 2016 Statistics House collapse.
- The Ministry advised that it had not reviewed the requirement since 2008.

VIA's policy conclusion is that four years should not be preserved solely by inertia. A two-year period should be evaluated as the preferred middle-ground option, alongside the status quo, the documented three-year comparator and any shorter option supported by risk evidence. The evaluation should measure actual transfers, attempted circumvention, administrative cost and hardship—not commercial motive in the abstract.

### A.5 Permit-frequency restriction

Historical material released under OC260612 proposed that an applicant must not have imported more than one qualifying vehicle in the preceding 12 months. Current NZTA guidance instead combines a two-year bar on receiving another permit with a requirement that the applicant have no other SIV registered in their name. The available material does not explain the change. NZTA should therefore review the combined effect of these controls rather than considering permit frequency in isolation.

### A.6 Scheme utilisation and enforcement

VIA's internal compliance-data extract provides a separate operational view of the pathway. It identifies the following numbers of vehicles first observed with an SIV code:

- 8 from the regime's commencement on 8 May 2008,
- 20 in 2009,
- 58 in 2010,
- 148 in 2011,
- 162 in 2012,
- 161 in 2013,
- 124 in 2014,
- 139 in 2015,
- 122 in 2016,
- 125 in 2017,
- 115 in 2018,
- 83 in 2019,
- 60 in 2020,
- 71 in 2021,
- 89 in 2022,
- 98 in 2023,
- 85 in 2024 and
- 60 in 2025.

These are first-observed compliance records, not permit-grant figures. The dataset owner has not independently verified the extraction, so the series should be treated as provisional pending reconciliation with source definitions and NZTA records.

For 2011–2018, the extract contains 1,096 SIV-coded vehicles and indicates that the pathway was used mainly for relatively recent enthusiast and performance vehicles rather than only classic or vintage vehicles. The largest groups reported for that period were 229 Corvettes, 226 Mustangs, 95 Camaros and 68 Skylines, together exceeding half of the period total. It also identified 38 TVRs and one Morgan, with smaller numbers of Aston Martin, Ferrari, Maserati, Caterham and Lotus vehicles. The median difference between vehicle year and compliance year was about 15 years; 78 vehicles had a difference of at least 20 years, and none had a difference of 25 years or more. This evidence cautions against defining the pathway by subjective perceptions of rarity or prestige. It supports focusing on objective eligibility, safety risk and scheme-integrity controls.

A broader make/model extraction reported 309 Chevrolet Corvettes, 305 Ford Mustangs, 143 Mitsubishi Lancers, 112 Chevrolet Camaros, 93 Nissan Skylines, 80 Jaguar XKRs, 50 Subaru Imprezas, 46 Jaguar XK8s, 28 Ford F150s, 24 TVR Chimaeras, 21 MG RV8s and 21 Porsche 911s.



The broader make and model extraction is indicative only and should not be relied on for precise quantitative conclusions because its time coverage and code mapping have not been independently reconciled. Its relevance is qualitative: the vehicles appearing in SIV-related records are diverse, and production volume alone does not determine the appropriate regulatory pathway. A standards-compliant production model may require an exemption for a discrete gap, while a commercially manufactured low-volume vehicle may raise a different question about the recognition of overseas approval evidence.

The extract also confirms that the underlying database contains multiple special-permit codes. Non-left-hand-drive codes include IM (immigrant's vehicle), MS (motorsport), SP (special interest) and DV (disability), with probable SIMC records still unresolved. Left-hand-drive codes include A, B, C1–C5 and D–G, together with legacy generic, Category C and motorsport values. Any further analytics should filter and document these codes explicitly so that SIV, other non-LHD pathways and left-hand-drive concessions are not conflated.

NZTA OIA-22837 confirms that the annual quota has never been reached. The 2026 decision figures do not reconcile to applications because two applications were still pending or otherwise not captured as grants/declines at the extraction date. These permit statistics should not be conflated with VIA's separate compliance-record extract of vehicles first observed with SIV coding.

| Year           | Applications | Granted | Declined |
|----------------|--------------|---------|----------|
| 2021           | 102          | 99      | 3        |
| 2022           | 94           | 94      | 0        |
| 2023           | 80           | 72      | 8        |
| 2024           | 65           | 57      | 8        |
| 2025           | 57           | 48      | 9        |
| 2026 to 9 July | 11           | 7       | 2        |

NZTA reported no records of investigations, warnings, prosecutions, or other enforcement activity concerning SIV conditions. It also identified 54 SIV vehicles first registered from 1 January 2021 that changed registered person within four years. The extracted data does not establish whether those changes were authorised transfers, lawful successions, administrative changes, or breaches. The figure should therefore be treated as evidence that transfer outcomes are not transparent in the available data, rather than as proof of widespread non-compliance. This supports the case for clearer published transfer, hardship, and variation arrangements, as well as better reporting of the basis on which transfers are approved or recorded.

## A.7 Domestic and international comparison

| Scheme                               | Retention / transfer feature              | Nature                        |
|--------------------------------------|-------------------------------------------|-------------------------------|
| NZ SIV                               | 4 years                                   | Standards exemption           |
| NZ Category A LHD                    | 4 years or age 20, whichever occurs first | RHD conversion exemption      |
| NZ immigrant/personal import pathway | 1 year                                    | Standards/personal concession |
| NZ Customs Concession 80             | 2-year clawback                           | Duty/GST concession           |
| UK Transfer of Residence Relief      | 12 months                                 | Customs/VAT relief            |

| Scheme                               | Retention / transfer feature     | Nature                          |
|--------------------------------------|----------------------------------|---------------------------------|
| Ireland Transfer of Residence Relief | 12 months                        | Vehicle registration tax relief |
| US Show or Display                   | Transfer permitted with approval | FMVSS exemption                 |

These regimes are not identical and should not be treated as proving a particular SIV retention period. They are relevant because they show that different jurisdictions manage concession integrity through combinations of ownership, transfer, age, use and eligibility controls rather than a single four-year ownership lock.

### A.8 Preferred SIV reform package

- Introduce an age-20 taper equivalent to the Category A LHD framework.
- Introduce a controlled transfer mechanism and formal hardship/variation process.
- Reduce or formally review the four-year ownership period, with two years as VIA's preferred middle-ground option and three years as the strongest historical comparator.
- Review the two-year permit-frequency restriction and the case for an annual or other less restrictive control.
- Improve eligibility transparency, including consideration of a published model-level eligibility register.
- Publish current permit statistics, exemption/review pathways and consistent administrative guidance.

## Appendix B – Proposed Overseas Low-Volume Approval Recognition Framework

### B.1 Scope

This proposal is limited to commercially manufactured vehicles produced under recognised overseas low-volume approval systems. It is not intended to provide a new recognition route for amateur-built vehicles, individually constructed hobby vehicles, privately assembled kit cars or replicas produced outside recognised manufacturing systems.

### B.2 Core recognition principle

**The test should be equivalent regulatory outcome and credible evidence, not identical process or jurisdiction of origin.**

**Operational formulation.** Recognise what the overseas approval demonstrably proves; map that proof to the corresponding New Zealand Rule; identify any residual gap; and limit further evidence, testing or exemption to that gap. Where authoritative regulator or approval records already establish the matter, an independent importer should not be made dependent on discretionary OEM confirmation.

Where an overseas approval system is recognised, the approval should be capable of being used as evidence toward normal New Zealand entry certification. NZTA should identify any genuine difference between the overseas approval and the applicable New Zealand requirement and require additional evidence only for that gap.

### B.3 Candidate recognition criteria

| Criterion                 | What NZTA would need to be satisfied about                                                                                                                                                                                                                        |
|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Regulatory authority      | Approval is issued by, or under the authority of, a recognised government or regional approval authority.                                                                                                                                                         |
| Technical basis           | The approval category has defined technical requirements capable of comparison with corresponding New Zealand requirements.                                                                                                                                       |
| Engineering assessment    | Competent engineering or technical assessment forms part of the approval process.                                                                                                                                                                                 |
| Inspection/testing        | The system includes inspection, testing or verification appropriate to the approval type.                                                                                                                                                                         |
| Traceability              | The individual vehicle can be linked to the approval through VIN, approval number or equivalent records.                                                                                                                                                          |
| Documentation             | Formal approval documents are available and verifiable.                                                                                                                                                                                                           |
| Production assurance      | For series production, the system provides confidence that production vehicles conform to the approved specification.                                                                                                                                             |
| Change control            | Material post-approval modifications can be identified and addressed.                                                                                                                                                                                             |
| Independent-import access | Regulator records, approval certificates, Certificates of Conformity, VIN-linked information, component markings and technical-service reports can be used where reliable; OEM confirmation is not required merely because the vehicle is independently imported. |

| Criterion | What NZTA would need to be satisfied about                                                                |
|-----------|-----------------------------------------------------------------------------------------------------------|
| NZ gaps   | Any New Zealand-specific or materially different requirement can be identified and dealt with separately. |

#### B.4 Recognition process

1. NZTA evaluates an overseas approval system or approval category against published criteria.
2. If acceptable, NZTA creates a file in the MVR to record the system/category on a Recognised Overseas Low-Volume Approval Register together with any conditions or limitations.
3. An importer presents the prescribed approval evidence linking the individual vehicle to the recognised system.
4. Entry certification confirms vehicle identity, condition and conformity with the approved specification.
5. Any identified New Zealand-specific gap is addressed through targeted evidence or certification.
6. If compliance cannot be established despite that process, the vehicle may still be considered under SIV or another appropriate exemption pathway.

#### B.5 Emissions and Clean Vehicle treatment

The proposed recognition framework is intended to support normal entry certification by making better use of credible overseas evidence. The precise legal mechanism may involve acceptable-evidence guidance, VIRM changes, Rule amendments, or a combination of these measures. Similarly, any consequential treatment under emissions or Clean Vehicle provisions should be determined through the applicable statutory and regulatory framework once NZTA has defined the recognition approach. These questions do not detract from the policy case for a structured recognition process; they identify the implementation work required.

## Appendix C – Comparative assessment of candidate overseas systems

Japan's Type Designation, Preferential Handling Procedure, and individual approval pathways may warrant further consideration as possible comparators. The available material indicates that these pathways serve different vehicle categories and evidential purposes. Their detailed operation, volume thresholds, and implications for New Zealand recognition require primary-source verification before they are treated as a basis for a formal equivalence conclusion. Japan should therefore be identified as a candidate research stream rather than a concluded recognition example.

UK-issued EC small-series approvals under the former Directive 2007/46/EC remain useful as a historical and evidential comparator where a selected vehicle is demonstrably covered by the relevant approval. The pilot should focus on the approval documentation for the individual vehicle and approval category, rather than implying that every historical UK-issued approval remains an available route for current production. This is consistent with the submission's central approach: assess what the approval demonstrably proves in the case at hand.

Australia's Specialist and Enthusiast Vehicle framework is a useful comparator because it distinguishes model eligibility from vehicle-specific entry processes. Public material supports the proposition that a model may be eligible for the framework, but it does not itself establish completion of every subsequent vehicle-specific approval and entry step. The comparison should therefore be used to illustrate regulatory structure, not to make a conclusive claim about the entry status of a particular Morgan vehicle.

The following table is a working assessment derived from VIA's existing comparative material. It is not a final equivalence determination. Primary-source verification is required before lodgement, particularly where different approval pathways sit within the same jurisdiction.

| Jurisdiction / pathway                                                  | Vehicle scope identified in VIA material                                                                  | Key features identified                                                                                                                                                                                               | Provisional relevance                                                                                                                                                                         |
|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| New Zealand LVV certification                                           | Modified, scratch-built and low-volume vehicles                                                           | Vehicle-by-vehicle inspection and certification; LVV plate and records                                                                                                                                                | Domestic benchmark for certain individually assessed vehicles; not necessarily the correct sole comparator for commercial series production.                                                  |
| United Kingdom: VCA type-approval pathways and DVSA individual approval | Individual and low-volume vehicles                                                                        | VCA is the UK type-approval authority for whole-vehicle and small-series type approvals. DVSA administers IVA and MSVA for individual vehicles. DVLA registration records do not themselves constitute type approval. | Strong candidate for structured equivalence review, provided the paper keeps type approval and individual approval distinct and verifies the approval documentation for the selected vehicle. |
| Japan: Type Designation, Preferential Handling Procedure and            | Potentially distinct pathways for mass-market types, lower-volume/imported models and individual vehicles | Reviewer-supplied research suggests the Preferential Handling Procedure may provide an intermediate low-volume analogue, while individual approval remains vehicle-specific. The reported                             | Include as a candidate research stream only. Do not rely on volume thresholds, "unknown" registration treatment or evidential equivalence until verified from                                 |

| <b>Jurisdiction / pathway</b>                                                        | <b>Vehicle scope identified in VIA material</b>                                                                                                                      | <b>Key features identified</b>                                                                                                                                                                                                                                                                                                                           | <b>Provisional relevance</b>                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| individual approval                                                                  |                                                                                                                                                                      | numbering and registration consequences are not yet supported by sufficient primary MLIT/JASIC material.                                                                                                                                                                                                                                                 | current primary Japanese sources.                                                                                                                                                                                                                                             |
| UK-issued EC small-series approvals under Directive 2007/46/EC (“KS07/46” approvals) | Commercial low-volume production vehicles approved under the historical EC small-series category                                                                     | “KS07/46” is an approval-number identifier, not the name of a standalone UK scheme. An e11 prefix identifies a UK-issued approval. The category was legally distinct from UK national small-series approval, which used NKS characters, and incorporated formal type-approval documentation and production-conformity requirements.                      | Strong pilot candidate. Before lodgement, confirm the selected vehicle’s approval certificate, scope, historic production ceiling and present legal relevance. Do not imply that every historic e11 approval remains a live route for current GB production.                  |
| European Union Small Series Type Approval                                            | Commercially manufactured low-volume vehicles approved under EU whole-vehicle small-series provisions; distinct from national small-series and individual approvals. | Approval authority and approval number; defined type/variant/version; vehicle-specific Certificate of Conformity; conformity-of-production controls; technical requirements and alternative provisions under Regulation (EU) 2018/858 and amending legislation. Requirements, including R155/R156, may be subject to scope and staged application dates. | Strong recognition candidate. The supplied Morgan COC proves VIN-to-approved-type traceability and provides detailed vehicle data, but the underlying approval certificate, information package and standards matrix remain necessary for a New Zealand equivalence decision. |
| Germany individual/TÜV approval                                                      | Individual/specialist vehicles                                                                                                                                       | Technical assessment and vehicle-specific approval                                                                                                                                                                                                                                                                                                       | May be relevant for particular vehicles but requires careful distinction from commercial small-series type approval.                                                                                                                                                          |
| Australia: federal SEV eligibility and concessional RAV-entry pathway                | Commercially manufactured specialist and enthusiast vehicles eligible under the Commonwealth framework; state and territory ICV processes are separate.              | The model’s SEV entry is the first step only. Vehicle-specific progression may require concessional RAV-entry approval, an applicable approved Model Report, approved RAW work or verification, and individual RAV entry. ROVER is the                                                                                                                   | Useful recognition comparator. Public material supports model eligibility, not completion of the pathway by a particular Morgan; obtain vehicle-specific approval and                                                                                                         |

| Jurisdiction / pathway | Vehicle scope identified in VIA material | Key features identified                          | Provisional relevance                 |
|------------------------|------------------------------------------|--------------------------------------------------|---------------------------------------|
|                        |                                          | administration portal, not an approval category. | RAV records before making that claim. |

### C.1 Important distinction – EU-wide versus national small-series approval

EU Small Series Type Approval and an individual Member State's national small-series approval are not necessarily equivalent in territorial effect or recognition mechanism. The proposed framework should therefore assess the evidential and regulatory effect of each approval category rather than assume blanket recognition across all small-series pathways.

## Appendix D – Illustrative Morgan case study and supplied Plus Six Certificate of Conformity

### D.1 Why use a case study?

The policy proposal is manufacturer-neutral, but an actual vehicle is useful for demonstrating where the present framework may create duplication or a classification gap. Morgan vehicles provide a suitable illustration because they are commercially manufactured to repeatable specifications, supported by modern engineering, controlled factory processes, and recognised overseas approval pathways. The available Certificate of Conformity relates to a Morgan Plus Six SuperSport. References elsewhere to the Morgan Plus Four or Morgan Plus Six illustrate the same underlying proposition: vehicles from a professionally manufactured low-volume model range should be assessed according to the evidence available for the relevant vehicle and approval category, rather than being assumed to be equivalent to one-off or unassessed vehicles.

### D.2 Characteristics identified for the Plus Six policy example

- Commercial manufacture rather than amateur or hobby construction.
- Repeatable production specification.
- Bonded aluminium CX platform.
- Contemporary BMW powertrain and associated electronic systems.
- Use of numerous UNECE-approved components.
- Publicly identified eligibility under Australia's federal Specialist and Enthusiast Vehicle framework; completion of the vehicle-specific concessional RAV-entry pathway remains to be demonstrated for the selected vehicle.

These features do not prove New Zealand compliance on their own. They demonstrate why the vehicle should be assessed as a professionally manufactured low-volume product rather than assumed to be equivalent to a one-off or unassessed vehicle.

### D.3 Supplied Plus Six SuperSport Certificate of Conformity

- The supplied Certificate of Conformity is for a Plus Six SuperSport and can be used to demonstrate the evidence chain available under an EC small-series approval, not as proof of the Plus Six's approval or New Zealand compliance.
- Vehicle and approval linkage: Morgan; type LP23; variant B; version CA19SPC; M1; VIN SA9LPS58A0TP004028; manufacture date 20 January 2026; approval e9\*KS18/858\*11350\*06, granted 30 July 2025.
- Technical content: dimensions and masses; BMW engine and drivetrain identifiers; braking-related and tyre data; ECE R51.03 noise information; Euro 6e-bis-FCM emissions information; WLTP CO2 and fuel-consumption values; and stated equipment fitment.
- Evidential effect: the COC is strong evidence that the individual vehicle conforms to a defined approved type. It is not the approval certificate or technical information package, and it does not disclose the complete standards matrix, alternative requirements, exemptions or supporting tests.
- Immediate next step: obtain the approval certificate and information package for e9\*KS18/858\*11350\*06 and map each approval requirement to the corresponding New Zealand Rule and acceptable-evidence provision.

#### D.4 The case-study question for NZTA

**What evidence would NZTA need to recognise the vehicle's overseas low-volume approval as proof of compliance, or to identify only the specific New Zealand requirements that remain unmet?**

#### D.5 Proposed pilot method

1. Select one actual Morgan vehicle proposed for New Zealand entry and obtain authority to use its records as the pilot file.
2. Compile the complete overseas approval and vehicle-identity dossier.
3. Identify each New Zealand standard presently requiring SIV or another exemption.
4. Map the overseas approval evidence against those New Zealand requirements.
5. Classify each requirement as fully evidenced; technically aligned but lacking accepted documentary proof; subject to a materially different overseas alternative requiring an equivalence decision; a genuine New Zealand-specific gap needing targeted certification or exemption; or not evidenced.
6. Record NZTA's decision and evidence expectations so the conclusion can be reused for later vehicles under the same approval category where appropriate.
7. Validate the pilot against NZTA's 22 September 2021 Morgan advice, including which matters were accepted from markings or documents, which exemptions remained possible, and whether modification, rather than overseas approval status, was the trigger for LVV certification.

## Appendix F – Sources relied upon in this revision

- NZ Transport Agency, OIA-22837 response, 18 August 2026.
- Ministry for Cities, Environment, Regions and Transport, response OC260612, 18 August 2026, including released historical policy documents.
- NZ Transport Agency, OIA-22837 SIV application-process and operational material, released August 2026.
- NZ Transport Agency, “Special interest vehicles”, current public guidance checked 7 September 2026.
- NZ Transport Agency Vehicle Inspection Portal, Technical bulletin 26: Special interest vehicles, current guidance checked 7 September 2026.
- NZ Transport Agency Vehicle Inspection Portal, Category A left-hand-drive vehicle instructions, current guidance checked 7 September 2026.
- Morgan Motor Company, EC Certificate of Conformity – Complete Vehicles Type-Approved in Small Series, 2026 sequential number 0028, Plus Six Supersport, VIN ending 004028.
- “Small-Series Vehicle Safety Standards and the Role of UN Regulations 155 and 156”, VIA internal working note, reviewed 8 September 2026; treated as secondary material and qualified against the COC and primary EU law.
- Commission Delegated Regulation (EU) 2022/2236 of 20 June 2022, amending Regulation (EU) 2018/858, including staged requirements for small-series vehicles and software updates.