

16 August 2023

[REDACTED]

REF: OIA-13136

Dear [REDACTED]

**Request made under the Official Information Act 1982**

Thank you for your email of 19 July 2023 requesting the following information under the Official Information Act 1982 (the Act):

*White lettering on a black background license plates have recently been introduced. I have noted that at some lighting angles and in certain conditions it is almost impossible to read these plates. The black background in particular seems to simply wash out to a low contrast sheen obscuring the white letters.*

*Information Sought*

- Prior to adopting these plates was any research conducted about their readability in varying lighting conditions or do you hold any information about this, if so may I have an electronic copy of the investigation, information and report please*
- Do these plates conform to any standards relating to their reflecting properties and if so what are these, a link to any relevant published standard would be helpful. (for clarity I do not seek information on sizes and lettering fonts or the like)*

I can confirm that black background plates were tested with multiple enforcement cameras before being approved for release. Waka Kotahi NZ Transport Agency gave approval based on photos and readings from these cameras, and consultation with the New Zealand Police, which did not include any reports being produced. Therefore, I am required to refuse the first part of your request, seeking copies of any research or reports produced prior to the adoption of the black background plates, under section 18(e) of the Act, as the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

I can confirm, however, that Waka Kotahi is currently undertaking further investigation into the visibility of these numberplates, following their introduction.

In relation to the second part of your request, reflective sheeting must comply with the applicable New Zealand standards and specifications:

- **AS 1906.1 2017** Retroreflective materials and devices for road traffic control purposes, Part 1; Retroreflective sheeting, Section 3; Sheetings for Motor Vehicle Number Plates Class NP090(EMB) sheeting
- **NZTA M25 Retroreflective sheeting** – Specification with confirmation of compliance being listed in NZTA M25: Listing of approved registration plate sheetings.

The *AS 1906.1 2017* is a New Zealand standard that outlines the performance requirements for retroreflective sheeting, providing road authorities, manufacturers and testing authorities with consistent or uniform specifications that must be met. The *NZTA M25 Retroreflective sheeting* is Waka Kotahi guidance provided to manufacturers wishing to market their retroreflective sheeting in New Zealand. The guidance covers the requirements that manufacturers and suppliers must comply with before the product can be approved for use in New Zealand.

Further information regarding *NZTA M25 Retroreflective sheeting* is available on the Waka Kotahi website at: <https://www.nzta.govt.nz/resources/retroreflective-sheeting/>

Under section 28 of the Act, you have the right to ask the Ombudsman to review my decision to refuse part of this request. The contact details for the Ombudsman can be located at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz).

In line with Waka Kotahi policy, this response will soon be published on our website, with personal information removed.

If you would like to discuss this reply with Waka Kotahi, please contact Ministerial Services by email to [official.correspondence@nzta.govt.nz](mailto:official.correspondence@nzta.govt.nz)

Yours sincerely

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

**Chris Rodley**  
National Manager Regulatory System Design