

4 November 2024

[REDACTED]

Radio NZ

[REDACTED]

REF: OIA-16393

Dear [REDACTED]

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

Thank you for your email of 10 September 2024 requesting the following information under the Official Information Act 1982 (the Act):

*Could you pls forthwith provide RNZ a link to the PIA done on this.*

The following document is in scope of your request and is enclosed:

- Privacy Threshold Assessment – Transmission Gully ITS Implementation

Certain information has been withheld under the following sections of the Act:

- section 9(2)(a) – to protect the privacy of natural persons;
- section 9(2)(b)(ii) - to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied of who is the subject of the information; and
- section 9(2)(c) – to avoid prejudice to measures protecting the health of safety of members of the public.

With respect to the information that has been withheld, I do not consider there are any other factors which would render it desirable, in the public interest, to make the information available.

As per our previous responses to you on this matter, the Te Aranui o Te Rangihaeata – the Transmission Gully motorway (including its operation and maintenance) is being delivered under a Public Private Partnership (PPP). As part of this arrangement, contract payments are linked to a range of key performance indicators (KPIs).

The ANPR cameras are intended to be part of the motorway's traffic data collection infrastructure and Intelligent Transport Systems (ITS). When installed, they will 'read' the number plates of vehicles at each end to calculate average travel times along the motorway. They will be used to determine if the performance standards of our PPP contractors are being delivered. A high degree of accuracy is required, and this can only be achieved using ANPR technology.

They **will not be used** for recording individual vehicle speeds or for traffic enforcement purposes. Nor is there any intention to identify the owner or driver of vehicles.

Privacy protections are in place as well as strict measures to restrict access to collected data. Once the relevant travel data required has been measured, all images and registration numbers will be deleted in accordance with NZ Transport Agency Waka Kotahi (NZTA) privacy principles and rules.

Please note the cameras have not yet been installed – before any installation or use is implemented, due process will be followed. This includes consideration and mitigation of privacy risks, as well as any declarations required to be made.

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

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

If you would like to discuss this reply with NZTA, please contact Felix Marwick, Media Manager, by email to [felix.marwick@nzta.govt.nz](mailto:felix.marwick@nzta.govt.nz).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Andrew Robertson', with a long horizontal flourish extending to the right.

**Andrew Robertson**  
National Manager – Commercial Delivery