



12 February 2026

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Kia ora Richard

**Your Official Information Act request, reference: GOV-045355**

Thank you for your email of 3 January 2026, asking for *information relating to the justification for higher ACC levies applied to motorcycles of 601cc and above* under the Official Information Act 1982 (the Act). Our responses to your questions are below.

**1. Risk Modelling and Assumptions**

*Please provide all actuarial models, risk assessments, or analytical frameworks currently or previously used to justify differential levy rates based on motorcycle engine capacity, including:*

- *All variables included in those models*
- *The weighting applied to engine capacity relative to other variables*
- *Any assumptions explicitly linking engine size to crash likelihood or injury severity*

Information on the process for how we price the levies for each account can be found in our pricing reports. There is one report per account, and all are made publicly available at consultation. You can view the 2024 Motor Vehicle Account pricing report here: [www.shapeyouracc.co.nz/assets/Consult-docs/2024/20240630-Pricing-Report-2026-2028-Motor-Vehicles-Account-final.pdf](http://www.shapeyouracc.co.nz/assets/Consult-docs/2024/20240630-Pricing-Report-2026-2028-Motor-Vehicles-Account-final.pdf). Please refer to Appendix J (pages 33 - 41) for information on Classification of Risk.

**2. Evidence Basis**

*Please provide copies of all internal or external studies, reports, datasets, or literature reviews relied upon to support the claim that motorcycles over 601cc represent materially higher risk than smaller-capacity motorcycles, including publication dates and authors.*

Levy setting is based on ACC's claims data, as outlined in the pricing report and consultation document, rather than on research or literature. When assessing risk, ACC considers both the frequency of claims and the cost per claim, providing a view of both frequency and severity. It is within the severity dimension that a relationship between engine capacity and risk becomes evident, as shown in the higher average cost per vehicle and average cost per claim for larger-capacity motorcycles.

The following paper was developed to seek internal decisions on ACC's recommendations about levies for motorcyclists. This analysis was completed prior to the 2024 consultation. The levy rate impacts in the paper assume that total revenue collected from motorcycles was unchanged from the 2024/25 levy year and there was no change in the cross subsidy. Each proposal within the consultation was analysed independently, and therefore the total change in registration fees may differ significantly to that indicated in the paper. Please find a copy of this attached:

- Motorcycle Risk Relativities Advice

Further information on the data that was used on motorcycle claims frequencies per CC rating to determine the levy changes can be viewed on page 5 of the ACC levy system change proposals 2024 consultation document here: [www.shapeyouracc.co.nz/assets/Consult-docs/2024/ACC\\_Levy-system-change-proposals\\_FINAL.pdf](http://www.shapeyouracc.co.nz/assets/Consult-docs/2024/ACC_Levy-system-change-proposals_FINAL.pdf).

### **3. Kilometres Travelled / Exposure Data**

*Please confirm whether kilometres travelled, usage frequency, or exposure metrics are included in levy-setting models.*

*If not included, please provide:*

- *Any analysis explaining why exposure-based risk was excluded*
- *Any modelling that assessed kilometres travelled and was rejected*

Please refer to pages 39 to 40 of the 2024 Motor Vehicle Account pricing report for information on exposure related pricing of the Motor Vehicle account.

### **4. Rider Experience Consideration**

*Please provide documentation showing whether rider experience (e.g. years licensed, licence class, age, prior claims history) is intentionally incorporated into motorcycle levy calculations.*

*If rider experience is not explicitly accounted for, please provide the rationale for its exclusion.*

ACC has no legal basis to apply a levy discount based on the claims experience of an individual within the Motor Vehicle Account.

Part of ACC's 2024 levy proposal however was focused on recognising safer riders with lower levies. From 1 July 2026, a 25% levy discount for riders who have successfully completed advanced rider training will be introduced. This lower levy rate was introduced to recognise the lower risk of injury to riders who have advanced rider training, and to incentivise other riders to do the training.

You can view further information on this discount on page 6 of the ACC levy system change proposals 2024 consultation document and on the RideForever website here: [www.rideforever.co.nz/improve-your-skills/course-discounts/motorcycle-rego-cashback-programme](http://www.rideforever.co.nz/improve-your-skills/course-discounts/motorcycle-rego-cashback-programme).

### **5. Crash Causation vs Injury Cost**

*Please provide any analysis distinguishing between crash responsibility/fault and injury cost in motorcycle claims data.*

*If injury cost is used as a proxy for risk, please provide documentation explaining why causation was not considered necessary.*

In setting the relativities for different classes of vehicle ACC matches claims data to the Police/NZTA Crash Analysis System. Although this dataset includes information on crash responsibility, ACC does not use causation in setting of levy relativities.

Actions contributing to the cause of the accident was considered however to suggest a level of cross-subsidisation of motorcycle injury costs to be borne by other vehicle owners.

Please refer to the following documents for information relating to crash causation:

- Motorcycle Risk Relativities Advice
- ACC levy system change proposals 2024 consultation document (page 4)
- 2024 Motor Vehicle Account pricing report (page 38)

Please also find attached a spreadsheet which provides the data behind the statistics referred to in the change proposal and MVA pricing report documents.

Some values in the table provided only indicate that the claim count is fewer than four (denoted as <4). This limits the potential for individuals or matters specific to certain individuals from being identified. This decision has been made under section 9(2)(a) of the Act. In making this decision, we have considered the public interest in making the information available and have determined that it does not outweigh the need to protect our clients' privacy.

**6. Technology and Safety Adjustments**

*Please provide any analysis assessing the impact of modern motorcycle safety technology (e.g. ABS, traction control, stability systems) and modern protective gear on injury severity and levy justification. If no such analysis exists, please confirm this.*

**7. Revenue Impact Analysis**

*Please provide any internal documents, memos, or briefings discussing:*

- *Revenue dependence on higher-capacity motorcycle levies*
- *Financial impacts if a rider-based or exposure-based levy model were adopted*

**8. Alternative Models Considered**

*Please provide records of any consideration given to:*

- *Rider-based levies*
  - *Per-kilometre levies*
  - *Experience-weighted levies*
- including reasons these models were not adopted.*

ACC does not hold analysis on the topics above. As such, we are refusing to respond to this part of the request as the information is not held by ACC and we do not believe the information is held by another agency. This decision has been made under section 18(g)(i) of the Act.

**As this information may be of interest to other members of the public**

ACC may publish a copy of this response on ACC's website. All requester data, including your name and contact details, will be removed prior to release. The released response will be made available [www.acc.co.nz/resources/#/category/12](http://www.acc.co.nz/resources/#/category/12). Please also view this page about making requests and our published responses <https://www.acc.co.nz/contact/official-information-act-requests>.

**If you have any questions about this response, please get in touch**

You can email me at [GovernmentServices@acc.co.nz](mailto:GovernmentServices@acc.co.nz). If you are not happy with this response, you can also contact the Ombudsman via [info@ombudsman.parliament.nz](mailto:info@ombudsman.parliament.nz) or by phoning 0800 802 602. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz).

Ngā mihi



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