

14 November 2025

File Ref: OIAPR-1274023063-42861

By email: [REDACTED]@requests.fyi.org.nz

Tēnā koe [REDACTED]

## Request for information 2025-360

I refer to your request for information dated 16 October 2025, which was received by Greater Wellington Regional Council (Greater Wellington) on 16 October 2025. You have requested the following:

- *“What is the estimate in lost revenue from fare evasion on public transport each year?”*
- *What is the forecast revenue from fines issued by Transport Officers?*
- *What is the forecast rate of collection (i.e. what percentage of fines are expected to actually be paid)?*
- *What are the administrative costs involved in issuing and following up on fines, specifically costs including debt collection or enforcement costs*
- *Access to reports the GWRC has done on internal analysis of cost-benefit or effectiveness*
- *What is the total cost of this team since this role was created, per year? Including wages, training, uniforms, management and admin overhead, department setup if it's a separate unit.”*

## Greater Wellington's response follows:

Your request for information has been broken down and numbered below for ease of reference.

### Context

Penalties for failure to pay passenger service fares, and the powers of enforcement officers in relation to public transport service fares, are set out in sections 79M and 128F of the Land Transport Act 1998 (the LTA). The appointment of enforcement officers for the purposes of the LTA is set out in section 208 of the LTA. Infringement penalties are not set by agencies (for example Metlink/Greater Wellington); they are set at \$150 under the Land Transport (Offences and Penalties) Regulations 1999.

To date, Greater Wellington enforcement officers have been conducting an education and awareness approach with the intent of creating a positive customer experience while encouraging those catching public transport to pay the correct fare.

**Attachment 1** contains a copy of the paper that was used to establish the Revenue Protection team.

*1. What is the estimate in lost revenue from fare evasion on public transport each year?*

Please refer to **attachment 2**, which contains a copy of the presentation provided to the Greater Wellington Regional Council on 14 August 2025. Slide 4 includes some context regarding fare evasion. The range of 5–7% non-payment represents an indicative estimate derived from a review of multiple fare data sources and internal analysis undertaken to understand potential levels of fare evasion across the network.

We note it is challenging to obtain a complete and accurate picture of fare evasion. At present, there is no system in place that provides a definitive measure of fare evasion across all modes and services. The figures provided should therefore be viewed as a broad indication based on the available data and operational understanding of the network.

*2. What is the forecast revenue from fines issued by Transport Officers?*

We have not completed any forecasting on revenue from fines issued by Transport Officers. Greater Wellington would like to emphasise our use of fare enforcement measures under the LTA is driven by our desire for all passengers to pay their correct fare. Fare enforcement measures are not treated as a revenue generation activity by our Council, and our Transport Officers are not set any 'performance targets' or similar for the issuance of infringement notices.

We are refusing this part of your request under section 17(g) of the Local Government Official Information and Meetings Act 1987 (the Act) on the basis that the information requested is not held by Greater Wellington and we no grounds for believing that that the information is either –

- (i) held by another local authority or a department or Minister of the Crown or organisation; or
- (ii) connected more closely with the functions of another local authority, or a department or Minister of the Crown or organisation.

*3. What is the forecast rate of collection (i.e. what percentage of fines are expected to actually be paid)?*

There is no forecasted rate of collection. All passengers who are unable to provide the correct fare evidence are requested to make the correct fare payment at the time of the Transport Officer interaction. We typically find most passengers make payment after being requested to pay their fare.

Therefore, we are refusing this part of your request under section 17(g) of the Act on the basis that the information requested is not held by Greater Wellington and we have no grounds for believing that the information is either –

- (i) held by another local authority or a department or Minister of the Crown or organisation; or
- (ii) connected more closely with the functions of another local authority, or a department or Minister of the Crown or organisation.

*4. What are the administrative costs involved in issuing and following up on fines, specifically costs including debt collection or enforcement costs*

To date, no infringements have been issued, so no administrative costs have been incurred related to following up on infringement notices, debt collection, or enforcement costs.

We note administrative costs for issuing an infringement notice are included within our standard operating costs. For example, if our Warranted Transport Officers issue an infringement notice in the course of their duties, we have a coordinator supporting infringement / enforcement administration as part of their role. Any further costs related to Court or debt collection are planned to be passed onto the customer who the infringement notice is issued to where this does occur.

*5. Access to reports the GWRC has done on internal analysis of cost-benefit or effectiveness*

We have not completed any internal cost-benefit analysis or effectiveness relating to this revenue protection function.

We are refusing this part of your request under section 17(e) of the Act in that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

When refusing under this section of the Act, we are required to consider consulting the requester. We have considered this and do not believe consulting with you would change our decision to refuse this aspect of your request under this section.

6. What is the total cost of this team since this role was created, per year? Including wages, training, uniforms, management and admin overhead, department setup if it's a separate unit.

|                                                                                 | FY21/22  | FY22/23     | FY23/24   | FY24/25   | FY25/26 (to Nov 25) | Total       |
|---------------------------------------------------------------------------------|----------|-------------|-----------|-----------|---------------------|-------------|
| Salaries, legal fees, temp staff, training, uniforms, and all other expenditure | \$90,840 | \$1,309,990 | \$778,728 | \$825,328 | \$207,052           | \$3,121,098 |

If you have any concerns with the decision(s) referred to in this letter, you have the right to request an investigation and review by the Ombudsman under section 27(3) of the Act.

Please note that it is our policy to proactively release our responses to official information requests where appropriate. Our response to your request will be published shortly on Greater Wellington's website with your personal information removed.

Nāku iti noa, nā

**Tamsin Evans**

Kaiwhakahaere Matua Waka-ā-atea | Group Manager Metlink (Acting)

From: Christine Bulmer, Manager Revenue Protection

To: Nigel Corry, Chief Executive

Through: Samantha Gain, General Manager Metlink  
Melissa Anderson, Manager Operations & Partnerships  
Donna Hickey, Acting General Manager People & Customer

Date: 11 May 2023

## **For Approval: Establishment of a permanent Revenue Protection Team in Metlink**

---

### **Purpose**

This business case is proposing the establishment of a new permanent Revenue Protection Team – Metlink with an FTE of 10.

The purpose of this team is to work across all modes, both onboard and offboard rail, ferry and bus services and facilities, on our regional public transport network. This aims to ensure, amongst other functions, that our revenue is protected by supporting customers in ensuring they have the correct ticket and information for their journey.

This business case proposes and seeks approval for the establishment of:

- Team Leader, Revenue Protection (permanent);
- 2 Senior Transport Officers (permanent);
- 6 Transport Officers (permanent);
- Revenue Protection Co-ordinator (permanent)

Initial thoughts, as included in the endorsed business case (attached), are that eight front line team members with support (Team Leader and Co-ordinator) is sufficient as we build the team after a large contractor focus of engagement and education. This will be continuously reviewed and reassessed as the team, and electronic ticketing progresses.

Position descriptions for the above positions have been developed and the positions have been evaluated through GW's job evaluation process.

### **Background**

In a normal non-COVID world our Metlink public transport network operates from ~5am until after midnight five days per week and then 24/7 Saturday to Sunday. It operates ~4100 trips daily on bus, train, and harbour ferry, and carries ~750,000 customers per week.

In 2021 Snapper was introduced as a method of payment on the Johnsonville rail line. In 2022 Council approved a plan to roll out Snapper as a method of payment across all our rail lines on the pathway to the National Ticketing Solution.

Revenue protection has been a significant focus in the pilot project to trial Snapper ticketing on the rail network. Under the current pilot project, Metlink agreed a temporary revenue protection model for the Johnsonville line with Transdev where the operator's staff continued to check and validate paper tickets and take cash payments, and a team of agency-contracted Metlink 'Transport Officers' checked Snapper tag-ons.

Currently on the Metlink Regional public transport network there is no permanent on transport support to our frontline team and customers to ensure they have the correct information and ticket for their journey, thus protecting revenue. Attached is a copy of the full business case which has been endorsed through the PMO process.

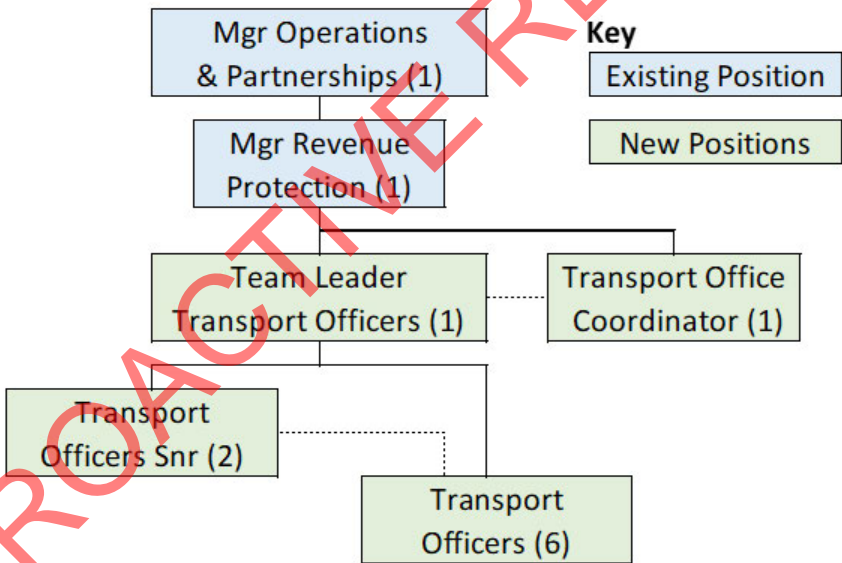
**Proposed structure**

Key aspects of the Metlink Transport Officers will be to:

- Proactively work across all public transport modes in our region to ensure customers are encouraged, engaged and educated to hold the correct ticket for their journey
- Proactively support our Metlink front line teams in any ticketing or behaviour issues on the network
- Hold and maintain warranted authority under delegation from NZ Police to issue infringement notices and apply enforcement measures as detailed in the warranted authority under the Land Transport Amendment Act 2017.

The proposed structure is:

**Proposed Transport Officer Team Structure & Headcount**



**Warranted Authority**

GW Legal have been consulted on the development and signing of the Letter of Agreement between NZ Police and GW which sets out the legal framework through which GW and its relevant officers will hold and maintain warranted authority under delegation from NZ Police to issue infringement notices and apply enforcement measures under the Land Transport Amendment Act 2017.

Further work will continue to set up an internal mechanism to issue and manage infringement notices.

## **Recruitment and Training Curriculum**

The intent is to undertake general recruitment for these positions. Upskilling would involve developing and delivering a suite of training modules including:

- National Certificate in Regulatory and Compliance Management Level 3;
- First Aid Certificate;
- Safety training relevant to all transport modes; and
- Dimensions critical to the TAA warranting requirements.

Careful and thorough candidate vetting will be required, including initial and ongoing vetting requirements under the Children's Act 2014 for non-core Children's Worker and the obligations for retaining the TAA warrant as a condition of ongoing employment.

The team, based out of 100 Cuba Street, would also require tools of the trade such as, uniforms, two-way radios, cellular devices, access to laptops, and locker space. Recruitment, training and warranting is envisaged to take place in Q1 and Q2 for FY23/24.

## **Proposed hours of work**

The intention is that Transport Officers will work in autonomous teams of two while deployed out on the network. The ideal operation coverage would be from 5.00am to 10.00pm. seven days per week, within a rotating roster with flexibility for acute event deployment (concerts, festivals etc.).

These hours of work are outside of GW's standard hours of work. HR has engaged with our Unions to seek a variation to the Multi Unions Collective Agreement (MUCA). The proposal is to align the hours of work for the Transport Officers with the current Contact Centre staff clause which allows for rostered shifts between the hours of 6.00am and midnight, Monday to Sunday.

## **Budget**

The Snapper on Rail Project budget has allocated \$3.4m for FY23 to FY25 which meets all planned costs for this business case in those periods. Transport Officers would fall within the overall funding of the rail contract. We are working with Waka Kotahi to determine if these resources could form part of Public Transport continuous programme funding in the future. The budget for FY26 and onward will be funded from Operations and Partnerships operational budgets.

## **Sundry Equipment**

The Transport Officers will require uniforms, radios, cell phones, and possibly body cameras. These costs are budgeted to be \$55k in FY 23 and \$6k thereafter and are included in the provided funding described above.

No third-party funding is required. However, we are working with Waka Kotahi to determine if these resources could form part of Public Transport continuous programme funding in the future.

## **HR Partner**

Our HR Partners Laura Irwin and Sonia Smith have reviewed and endorse this business case.

## Recommendations

It is recommended that you:

- a. **Note** the funding model required to establish this function
- b. **Note** the rationale for setting up the Revenue Protection team on a permanent basis
- c. **Note** that the Transport Officers will be required to be vetted under the Vulnerable Children's Act and be required to obtain and maintain TAA warrant authority
- d. **Approve** to proceed with the proposal to work with the Unions to align the hours of work for the Transport Officers with the current Contact Centre staff clause which allows for rostered shifts between the hours of 6.00am and midnight, Monday to Sunday.
- e. **Approve** the establishment of the permanent Revenue Protection team (10 FTE) including: Team Leader, 2 x Senior Transport Officer, 8 Transport Officer and Revenue Protection Co-ordinator

Endorsed by:



Luke Baron  
Strategic Finance Business Partner, Metlink

Date: 18 May 2023

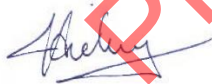
Endorsed by:



Samantha Gain  
General Manager, Metlink

Date: 18 May 2023

Endorsed by:



Donna Hickey  
General Manager, People and Customer

Date: 19/5/2023

Approved by:

Nigel Corry  
Chief Executive

Date: \_\_\_\_\_

# Towards a Revenue Protection Action Plan

INTEGRATED ACTION TO IMPROVE FARE COMPLIANCE

14 AUGUST 2025 - COUNCIL WORKSHOP

Christine Bulmer – Manager, Revenue Protection

Paul Tawharu - Senior Manager, Operations



# Purpose

To propose a revenue protection action plan which takes an integrated approach to improving fare payment behaviour.

## AGENDA

1. Background
2. Principles informing proposed approach
3. Intervention approach
4. Proposed intervention spectrum
5. Update on infringement notices and default fares
6. Recommended next steps

# Recap of previous engagement

- At Transport Committee Workshop on June 12 2025, Councillors requested supporting information about issuing infringement notices on the Metlink network, and providing equivalent default fares across the network.
- Councillor questions pointed to a need to contextualise these enforcement actions within an integrated plan of wider interventions. Referring to approaches taken by other public transport authorities – and considering the customer experience of fare compliance measures – officers have designed an integrated approach to improving fare compliance.



# Rail - fare evasion

## HOW WIDESPREAD IS FARE EVASION?

- Anecdotal observation indicates an increasing rate of fare evasion that can become normalised if left unattended.
- Comparing rail patronage (head count and Automated Passenger Count) and ticketing data indicates a relatively big variation in data across different sources.
- Based on this level of aggregate information – current estimate is that the variation associated with the rate of non-payment is potentially in the range of **5% to 7%** - but could be higher\*.
- Every 1% fare evasion (non-payment) is estimated to be equivalent of about \$0.5m fare revenue foregone.

\* These estimates do not account for other types of fare evasion (e.g. ineligible concessions, over-riding ).



# Types of Fare Evasion



**CONCESSION INELIGIBILITY** - E.g. customer is not entitled to the concession (e.g. Accessible, Child, Tertiary) but has gained access to a card with that concession loaded or is still using a green child snapper when not at school



**NOT TAGGING ON AND OFF** - The customer is not tagging on and off at the station. This will only be picked up by onboard pass-ops staff when the Snapper card is checked. This typically sits between 1-2% of journeys and may be people simply forgetting. Full fare checking (all passengers, all services) is the only way of detecting the full extent of this issue.



**CASH PAYMENT ONBOARD AS A “BACKUP”** - Customer purchasing cash fare onboard after being “checked” or “prompted” by staff. May not pay or volunteer payment if not directly approach. The rate of cash use onboard has not been declining in recent months – suggesting this is a growing form of fare evasion



**NOT TAGGING OFF (INTENTIONAL DEFAULT FARE)** - Customer don't tag off and in extreme instances (outbound to Masterton) there maybe a small value saving to the normal fare



**NOT INTENDING TO PAY** - Customer board service/s with no ability or intention to pay – at times “avoiding” requests for payment from onboard staff or blatantly asking for a ‘slip’ or discretion instead of payment.

# Principles informing proposed approach

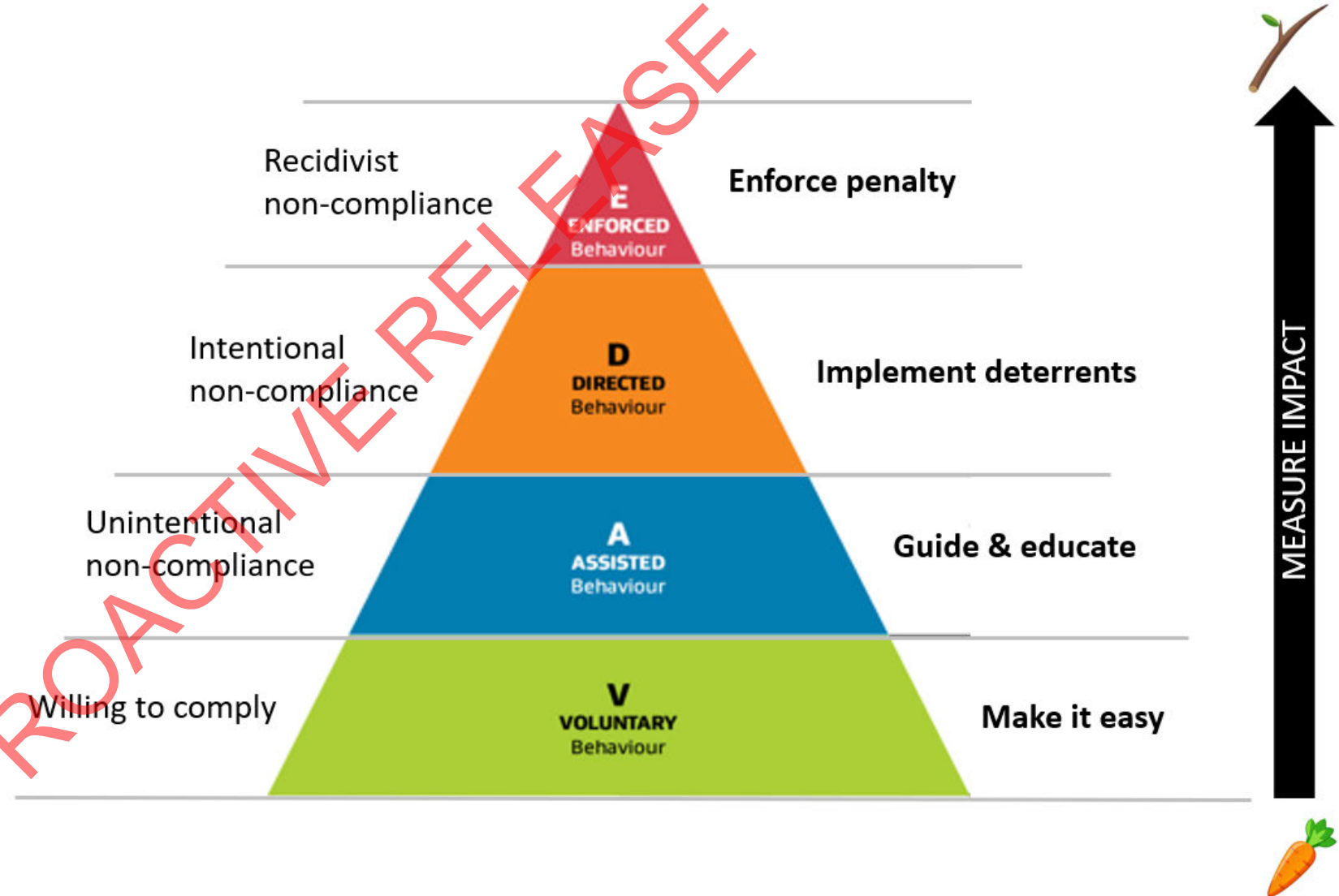
- **Start with rail fare compliance – the move to bus**  
Design for the most challenging payment compliance environment first.
- **Resolve a consolidated measure of fare compliance by rail line – and take a benchmark**  
Formalise data and reporting protocols using fare and passenger count data.
- **Be customer-centred in implementation of interventions**
  - Acknowledge there is a spectrum of fare payment behaviour – and that actions to curb fare evaders affect all passengers.
  - Explain why fare payment is important, and what we're doing to increase voluntary payment of fares.
- **Selectively use a range of action levers, and measure impact**  
Target different behaviours with appropriate interventions, monitor impact, and adjust actions
- **Apply actions consistently across the network**  
Plan and implement equivalent interventions across bus and ferry.

# Intervention approach

The VADE approach enables a community education and awareness approach to improving fare payment behaviour.

The intervention actions at the base of the triangle will generally be used to support those willing to comply, while those at the top of the triangle can be used in cases of active or intentional non-compliance.

The approach does not require intervention steps to be made sequentially over time. However there are impact measurement benefits by starting with certain interventions.



# Proposed intervention spectrum



Get the full payment compliance picture.

MEASURE

Make it easier to pay, for forgetful Snapper customers & those without cash.

MAKE IT EASY

Remind customers to pay – and why payment is important.

EDUCATE + DETER

Increase default fares; Ask all customers for payment.

DIRECT

Infringement notices

ENFORCE

## Objective

Establish integrated reporting; set a fare compliance benchmark.

Increase % customers paying on payment notices.

Increase levels of voluntary payment.

Deter passengers from gaming default fares; detect payment non-compliance and direct payment.

Detect and deter recidivist fare evaders.

## Intervention

Tighten Transdev and Metlink data gathering and reporting.

Make payment notices payable online.

Fare payment reminder campaign + Snapper validator patrols.

Sporadic checking of all passenger fares on all services.

WTOs issue infringement notices.

## Evidence

Consistent integrated measurement of fare compliance.

Increase in payment notices being paid.

Increase in Snapper scans; decrease in payment notices issued.

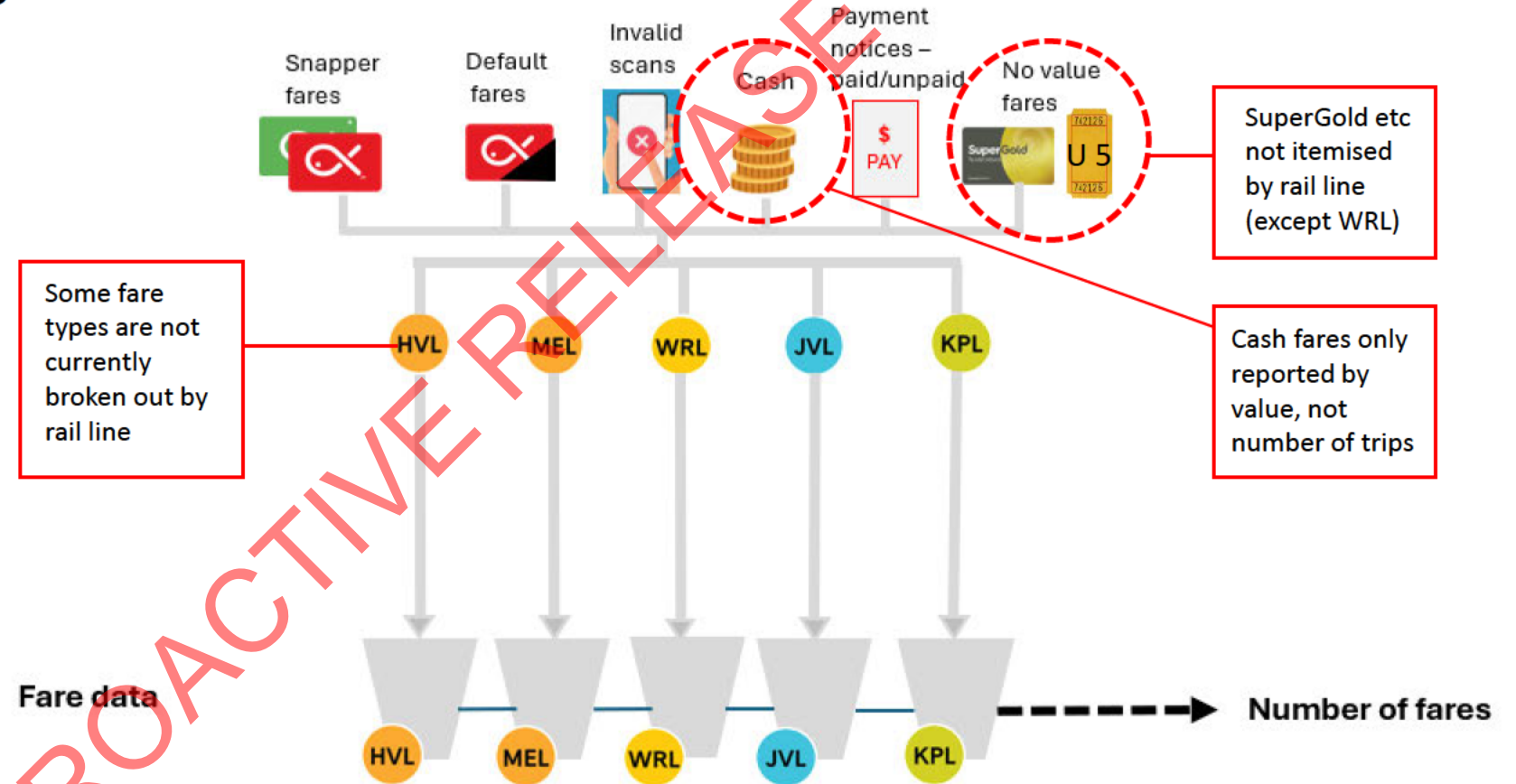
Increase in Snapper scans, cash fare payments and payment notices issued.

Increase in Snapper scans.

# Measuring and benchmarking fare compliance

## A. RESOLVE FARE DATA REPORTING

Metlink and Transdev are working to resolve an accurate consolidated measure of all fares paid, by rail line.



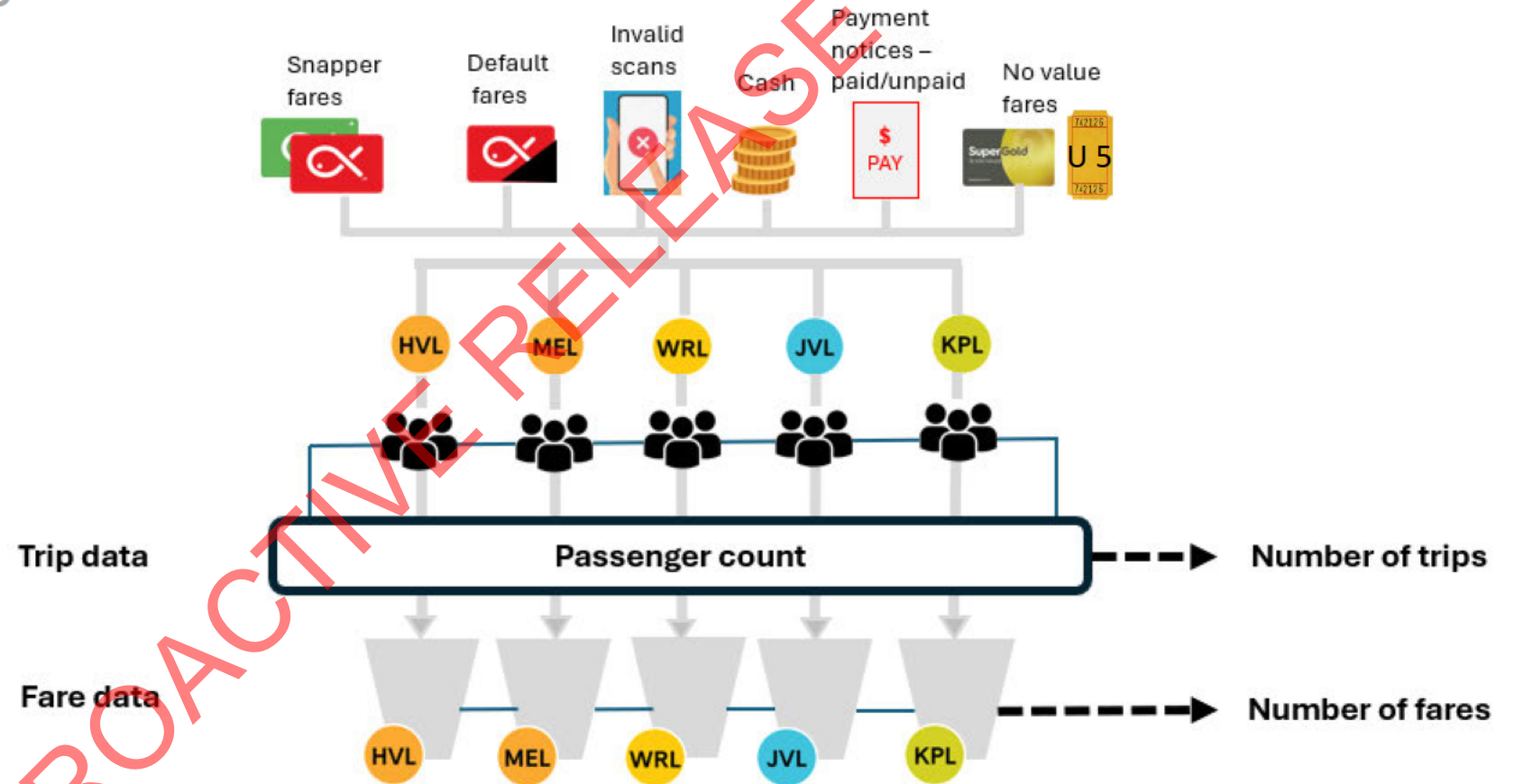
# Measuring and benchmarking fare compliance

## A. RESOLVE FARE DATA REPORTING

Metlink and Transdev are working to resolve an accurate consolidated measure of all fares paid, by rail line.

## B. RESOLVE THE MOST ACCEPTABLE MEASURE OF PASSENGER TRIPS

Address discrepancies, resolve the most accurate method – and lock in.



# Measuring and benchmarking fare compliance

## A. RESOLVE FARE DATA REPORTING

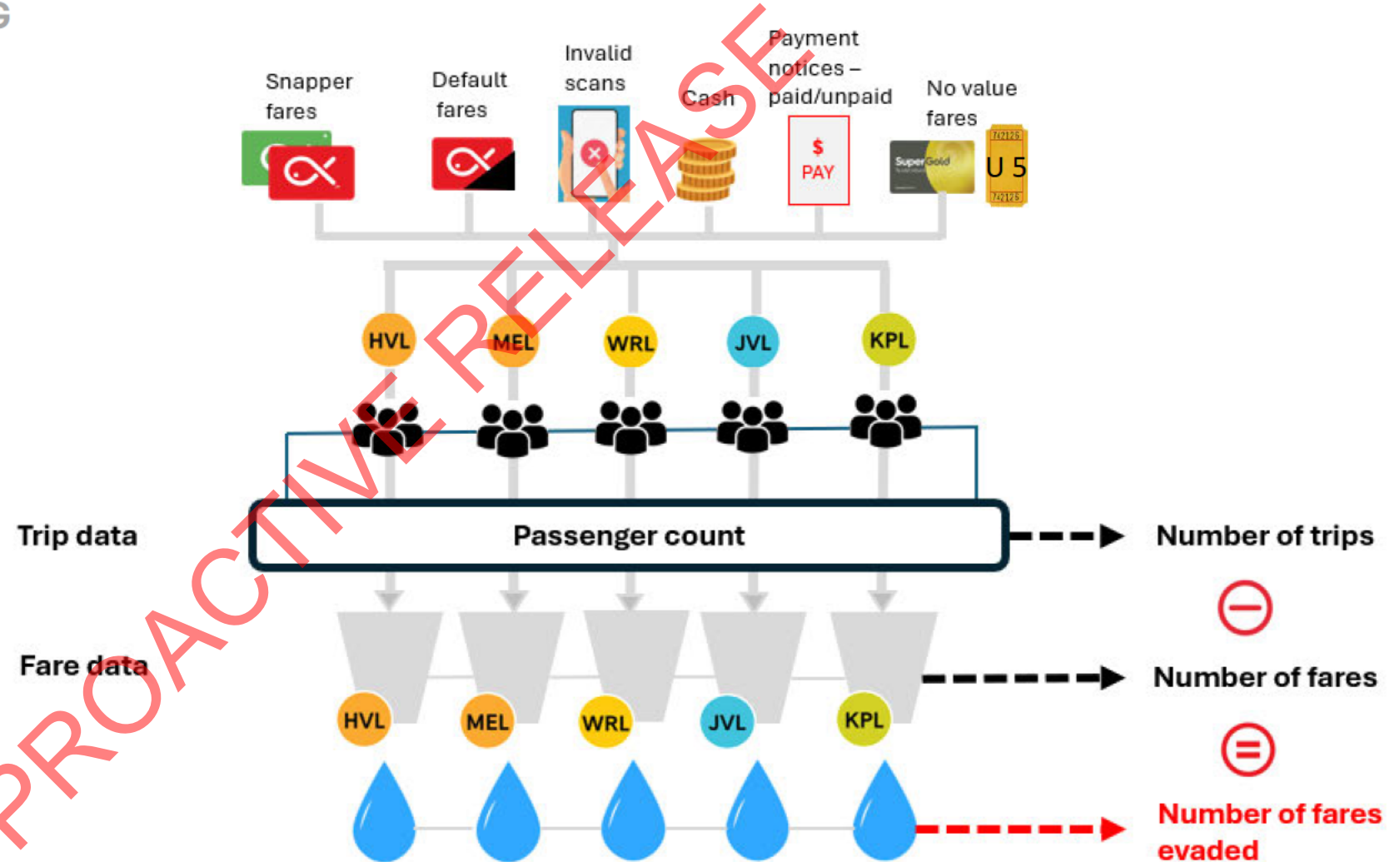
Metlink and Transdev are working to resolve an accurate consolidated measure of all fares paid, by rail line.

## B. RESOLVE THE MOST ACCEPTABLE MEASURE OF PASSENGER TRIPS

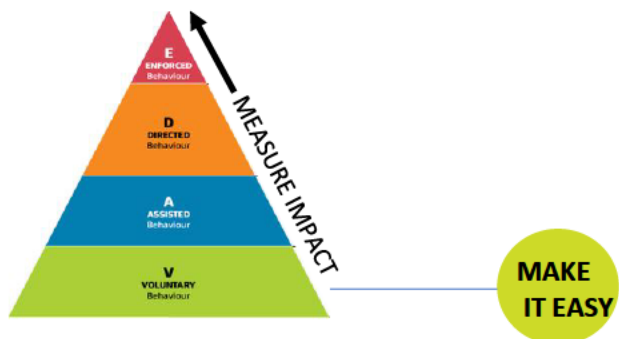
Address discrepancies, resolve the most accurate method – and lock in.

## C. BENCHMARK FARE LEAKAGE

Set a benchmark from which to measure impacts of compliance interventions. Additionally, set a benchmark of customer satisfaction with Metlink payment compliance actions.



# Make it easy – streamline payment



## OBJECTIVE

- Make it easier for forgetful Snapper customers and those without cash to pay their fare.

## EVIDENCE OF IMPACT

- Increased percentage of customers paying on payment notices.

## OPERATIONAL CONSIDERATIONS

1. Introduce digital payment options to payment notices (in progress)
2. Payment notice redesign will additionally make it easier and faster for train staff to process and issue.

**Note:** When NTS is available customers have the option of paying fare by debit or credit card.

**Metlink Payment Notice** metlink

You have not been able to pay a valid fare on the train today. This notice is to encourage you to pay at your earliest convenience, next time you're at the Wellington Railway Station Ticket Window. Our staff can ask you to leave our trains if you do not have a valid fare, but in this case have shown you discretion.  
Your co-operation is much appreciated.  
Thanks for travelling with Metlink.

**Fare Zones**

|         |         |
|---------|---------|
| Zone 1  | Zone 2  |
| Zone 3  | Zone 4  |
| Zone 5  | Zone 6  |
| Zone 7  | Zone 8  |
| Zone 9  | Zone 10 |
| Zone 11 | Zone 12 |
| Zone 13 | Zone 14 |

**Fare Type**

|       |       |
|-------|-------|
| Adult | Child |
|-------|-------|

**Line**

|     |     |
|-----|-----|
| JVL | HVL |
| MEL | KPL |
|     | WRL |

035175

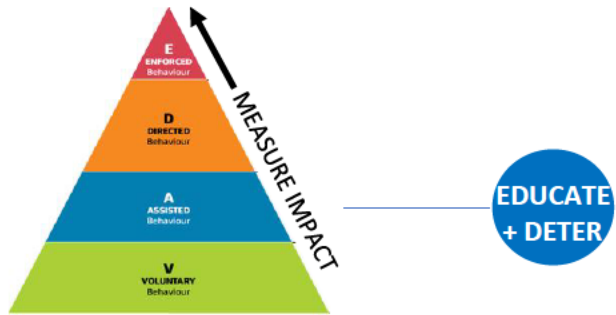
**Month of Issue**

|   |   |   |   |   |   |   |   |   |    |    |    |
|---|---|---|---|---|---|---|---|---|----|----|----|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
|---|---|---|---|---|---|---|---|---|----|----|----|

**Day of Issue**

|    |    |    |    |    |    |    |    |    |    |    |    |
|----|----|----|----|----|----|----|----|----|----|----|----|
| 1  | 2  | 3  | 4  | 5  | 6  | 7  | 8  | 9  | 10 | 11 | 12 |
| 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 |
| 25 | 26 | 27 | 28 | 29 | 30 | 31 |    |    |    |    |    |

# Guide and educate – remind and give the ‘why’



## OBJECTIVE

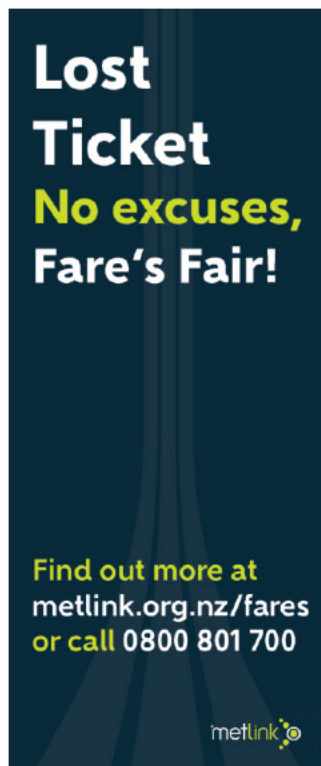
- Educate and remind customers that Metlink takes fare payment seriously, with the object of deterring intentional fare evasion.

## EVIDENCE OF IMPACT

- Lower numbers of payment notices issued.
- Lower total fares evaded
- Customer satisfaction with payment compliance actions.

## OPERATIONAL CONSIDERATIONS

1. Devise an onboard and online communications campaign reminding customers of the importance of paying.
2. Concurrently, devise joint Customer Service Ambassador/ Transport Officer campaigns of presence near card readers at key stations during peak hours, asking customers if they have forgotten to tag on/off.



Working title for upcoming Metlink fare payment awareness campaign

Draft Metlink marketing campaign material



# Implement deterrents – fare checking & default fares



DIRECT

## OBJECTIVES

- Deter fare evasion through higher scrutiny of payment and reviewed default fares.

## EVIDENCE OF IMPACT

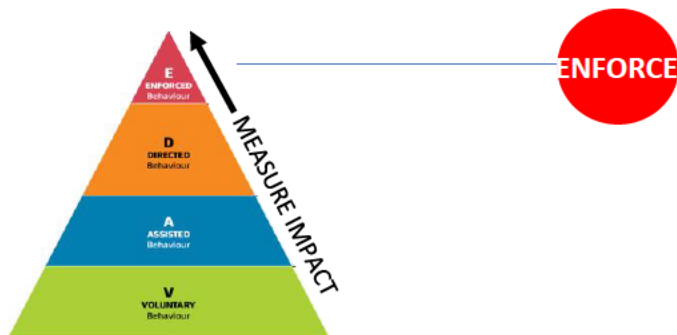
- Higher cash fare payments and numbers of payment notices issued; drop-off in default fares, esp. KPL & WRL
- Lower total fares evaded
- Customer satisfaction with payment compliance actions.

## OPERATIONAL CONSIDERATIONS

1. Implement campaigns of 100% fare checking on all services (where feasible for onboard staff – this is currently being trialed).
2. The default fare amount was increased as of 1 July 1 aiming to decrease suspected mis-use.
3. Continue onboard and platform comms explaining the importance of fare payment.
4. Continuously review default fare amounts reducing opportunistic misuse.



# Enforce penalties



## OBJECTIVES

- Promote fairness across the network
- Deter recidivist non-paying customers

## EVIDENCE OF IMPACT

- Lower default fares
- Lower total fares evaded

## OPERATIONAL CONSIDERATIONS

1. Only Metlink TOs are warranted to issue 'infringement notices'.
2. Transdev onboard staff can issue 'payment notices'.
3. Issuing infringement notices (is a last resort) to address persistent or intentional fare evasion.

**Greater Wellington**  
Te Pane Matua Taiao

Greater Wellington Regional Council  
PO Box 11646  
Manners Street  
WELLINGTON 6142

[Date]

Metlink Reference: [Ngatahi reference]

[Name First][Name Last]  
[Address Field 1]  
[Address Field 2]  
[City] and [Postcode]

Dear [First name only]

**Metlink fare payment**

To ensure we have the revenue to continue to deliver a comprehensive public transport network we need all passengers to pay their fares on our buses, trains and ferries. On [date] at [event time] on the [service details] one of our Warranted Transport Officers spoke with you because you were unable to show that you paid your correct fare for the service that you were using.

As it is an offence under section 79M(2) of the Land Transport Act 1998 if a person cannot provide evidence of having paid a fare that they are liable to have paid, we are sending you this Infringement Notice<sup>1</sup> for one hundred and fifty dollars (\$150.00) in accordance with section 4 of the Land Transport (Offences and Penalties) Regulations 1999.

**PUBLIC TRANSPORT SERVICE OFFENCE INFRINGEMENT NOTICE**  
(Issued under the Land Transport Act 1998)

Notice No:  
Enforcement authority: Wellington Regional Council  
Address for correspondence and payment: [insert]

To:  
Full name: [first name(s), family name]  
Full address:  
Electronic address:  
Occupation:  
Date of birth:  
Sex:  
Telephone number:  
**Alleged infringement offence(s) Details:**  
Date: [Date]

Wellington office PO Box 11646 Manners St, Wellington 6142  
Upper Hutt PO Box 40047 1056 Ferguson Drive  
Masterton office PO Box 42 Masterton 5840  
0800 556 734  
www.gw.govt.nz  
info@gw.govt.nz

# Recap of Warranted Authority

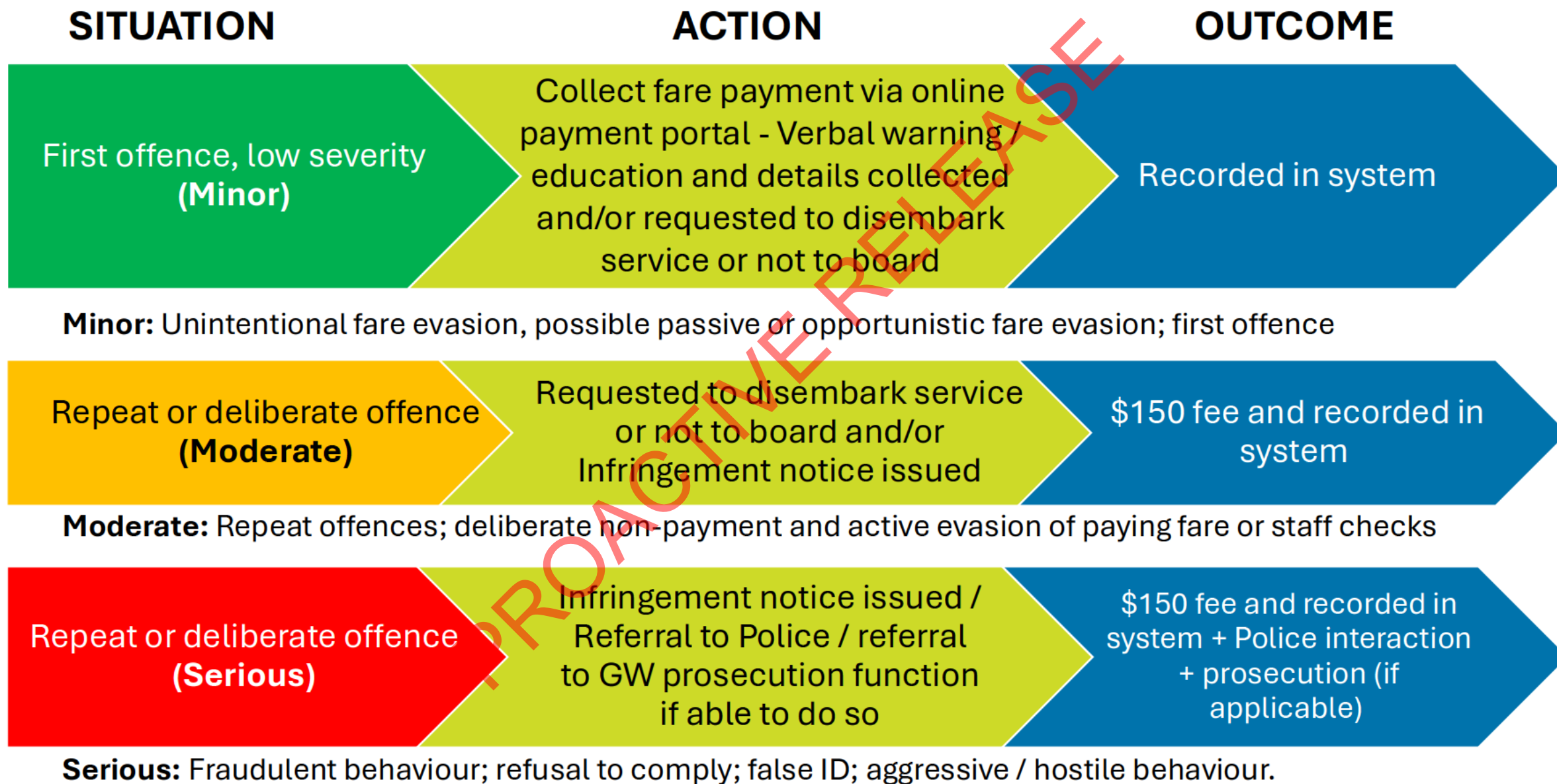
Under the Land Transport Act 1998, the Land Transport (Offences and Penalties) Regulations 1999, and the Land Transport Amendment Act 2017, WTOs are authorised to:

- Request proof of fare payment
- Request identification details
- Issue infringement notices
- Direct individuals to disembark or not board
- Refer serious or repeated offences for prosecution.

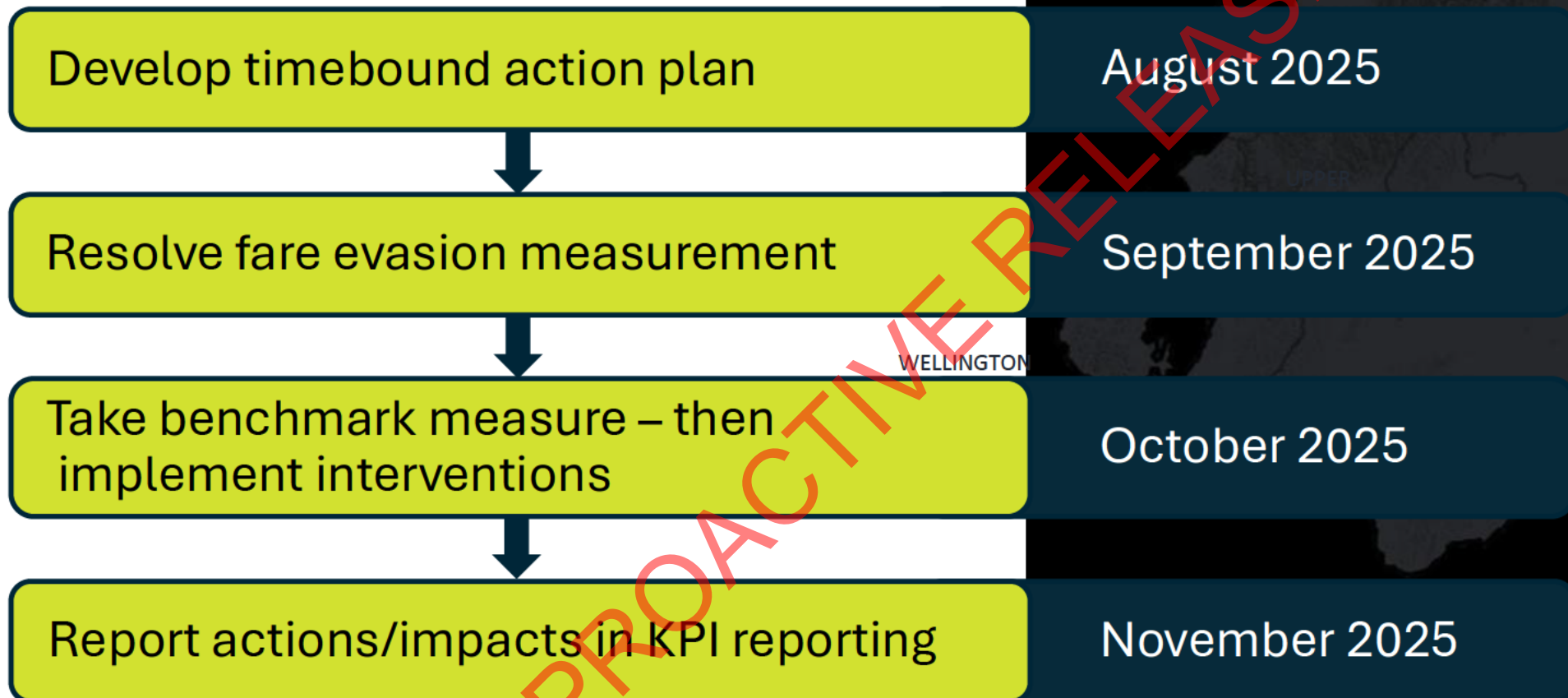
## **HOW FARE DETECTION IS IDENTIFIED?**

- Step 1: WTO boards vehicle or station and conducts checks.
- Step 2: Passenger asked to produce proof of payment.
- Step 3: Passenger refusal or inability to produce proof is recorded → offence detected

# Infringement Decision Tree



# Next Steps



# Question from Councillors

ANY QUESTIONS?

