

1 April 2026

File Ref: OIAPR-1274023063-48983

Miss M Quicken

By email: fyi-request-34173-d516ae28@requests.fyi.org.nz
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Tēnā koe Miss Quicken

Request for information 2026-117

I refer to your four requests for information dated 20 March 2026, which were received by Greater Wellington Regional Council (Greater Wellington) on 20 March 2026. You have requested the following:

“Please provide

A) the report / other document council has relating to SuperGold scheme funding gap from the previous financial year.

B) Projections from revenue loss due to SuperGold funding gap for current or next FY

C) Risk register identifying the shortfall on SuperGold funding gap as well as the inability to identify the shortfall in question acting as causation for revenue loss”

And

“A) Current training materials provided to the bus drivers on how to deal with SuperGold

B) Policy / strategy document that outlined why council chose the option of not requiring SuperGold users to register through snapper which then can be used to authenticate and verify the user

C) Briefing and any other material that formed the basis of treating SuperGold holders differently from the rest of the population, who both need a registered snapper and go through the process of tagging on and off.”

And

“A) The options document provided to council - on which basis the council made the decision was made to delay SuperGold registration requirement until the National Ticketing Solution (NTS) is deployed

B) The minutes or such document which documented both the decisionmaker/s and the decision itself to delay it for at least a year

C) Impact assessment of the decision adopted”

And

“Please provide the strategy document that outlined the revenue recovery options provided for the council to maintain the ticketing system in the bus network.

Also please provide the risk register & impact assessment documents which includes the item of not using transport officers in the bus networks and the financial risks associated of not applying fare enforcement.”

Greater Wellington’s response follows:

Your request has been assessed under the Local Government Official Information and Meetings Act 1987 (the Act).

The report / other document council has relating to SuperGold scheme funding gap from the previous financial year.

And;

Projections from revenue loss due to SuperGold funding gap for current or next FY

And;

Risk register identifying the shortfall on SuperGold funding gap as well as the inability to identify the shortfall in question acting as causation for revenue loss

Greater Wellington emailed you on 23 March 2026, requesting clarification on your phrase of “SuperGold Scheme Funding Gap”. As we received no response to our request for clarification we have interpreted these requests to the best of our ability.

As noted in our response to your information request 2026-056, the SuperGold concession is funded by central government and so therefore no revenue is lost by Greater Wellington through providing this concession.

As noted by yourself in your email titled “Official Information request - SuperGold bulk funding gap revenue loss from last FY & projection next FY” SuperGold funding switched to a bulk funding scheme, which occurred in 2016. Funding is provided by central government based on patronage projections and adjusted in the following year based on the difference between funding provided and recorded patronage. While we are aware of the possibility of some SuperGold passengers not being recorded properly in the Snapper system occasionally due to operators not manually recording every SuperGold passenger as required, we do not believe this is a significant amount and is unlikely to meaningfully affect funding received.

Additionally, the SuperGold concession is only available on off-peak travel, which is when services traditionally have available seating.

Greater Wellington does not consider that there is a SuperGold scheme funding gap, and as such the documents you have requested (report, other document, projections, and risk register) do not exist. Therefore, we are refusing these parts of your request under section 17(e) of the Act on the basis that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

In refusing these parts of your request under section 17(e) of the Act we have considered if consulting would assist you to make the request in a form that would remove the reason for the refusal. In attempting to consult with you on this request we have fulfilled our obligations under this section of the Act.

Current training materials provided to the bus drivers on how to deal with SuperGold

All bus drivers on the Metlink network are directly employed by the operators, who are contracted by Greater Wellington to provide public transport services across the network.

From an employment perspective, bus drivers are not considered employees of Greater Wellington. All training responsibilities and documentation for bus drivers is therefore owned and held by the operators.

Copies of training documentation for bus drivers is not held by Greater Wellington. As a result, 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

Greater Wellington is aware of instructions provided to Operators by Snapper on how to enter a SuperGold passenger into the system. We have provided this as **Attachment 1**. Please note, this document was created by Snapper and includes some incorrect information regarding SuperGold free travel periods being set by Greater Wellington. The periods where SuperGold funding is provided is set by central government. Councils can choose to fund any extension to those periods themselves, however, at this time Greater Wellington does not fund beyond the period set by central government.

Any other direction to operators on this matter is included in the contract between them and Greater Wellington. Greater Wellington has published our contracts with bus and rail operators on our website; you can access them through the following link: www.gw.govt.nz/transport/metlink-bus-train-and-ferry/public-transport-contracts/

Policy / strategy document that outlined why council chose the option of not requiring SuperGold users to register through snapper which then can be used to authenticate and verify the user

And;

Briefing and any other material that formed the basis of treating SuperGold holders differently from the rest of the population, who both need a registered snapper and go through the process of tagging on and off.

And;

The options document provided to council - on which basis the council made the decision was made to delay SuperGold registration requirement until the National Ticketing Solution (NTS) is deployed

The SuperGold concession predates the implementation of Snapper on the Metlink Network. SuperGold card was introduced in August 2007 while Snapper was introduced commercially by New Zealand Bus to its services in July 2008, and by Greater Wellington to the whole Metlink bus network in 2018.

Due to limitations from the Snapper system, dating back to its implementation, it is not possible for integration of SuperGold cards. While this limitation could now be remedied, the reprogramming necessary would be obsolete once the National Ticketing System (NTS) rollout is complete. Additionally, this would require passengers using SuperGold cards to register twice, once with Snapper and then again with NTS. To mitigate the effort and confusion for these customers, we have opted to wait until the rollout of NTS is complete.

The rollout of the NTS system across New Zealand is being led by NZ Transport Agency Waka Kotahi (NZTA). As a part of the NTS initiative, there is clear intention to permit for the cross registration between SuperGold card holders and NTS card holders, and the new system will be designed to accommodate this.

As the concession is funded by central government based on the quantity of concessions issued, it is a requirement that Greater Wellington track the number of concessions. As the integration with Snapper is not currently available this necessitates the current process of bus drivers manually entering SuperGold passengers.

Greater Wellington considers that the documents you have requested (strategy / policy document, briefing and other material, options document) do not exist. Therefore, we are refusing these parts of your request under section 17(e) of the Act on the basis that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

In refusing these parts of your request under section 17(e) of the Act, we have considered if consulting would assist you to make the request in a form that would remove the reason for the refusal. We have considered this and do not believe consulting with you would assist in relation to the material you have requested.

The minutes or such document which documented both the decisionmaker/s and the decision itself to delay it for at least a year

And;

Impact assessment of the decision adopted

The rollout of the NTS system across New Zealand is being led by NZTA. Greater Wellington considers that information on delays to the rollout of the NTS is held by, and is more closely connected to the functions of, NZTA.

As such pursuant to section 12 of the Act, Greater Wellington transferred these parts of your request to NZTA on 24 March 2026. A letter advising you of the transfer was provided to you on that same day.

The strategy document that outlined the revenue recovery options provided for the council to maintain the ticketing system in the bus network

And;

The risk register & impact assessment documents which includes the item of not using transport officers in the bus networks and the financial risks associated of not applying fare enforcement

Greater Wellington considers that the documents you have requested (strategy document, risk register and impact assessment documents including items outlined) do not exist. Therefore, we are refusing this part of your request under section 17(e) of the Act on the basis that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

In refusing these parts of your request under section 17(e) of the Act we have considered if consulting would assist you to make the request in a form that would remove the reason for the refusal. We have considered this and do not believe consulting with you would assist in relation to the material you have requested.

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

A handwritten signature in black ink, appearing to be 'PT' with a stylized flourish above the letters.

Paul Tawharu

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