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Ministry of Transport
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SUBMISSION ON –

REVIEW OF AGRICULTURAL TRANSPORT LEGISLATION

ON BEHALF OF THE N. Z. FEDERATION OF MOTORING CLUBS

The Federation of Motoring Clubs (FOMC) represents more than 125 member clubs covering tractors and farm machinery, commercial and military vehicles, motor caravans, traction engines, and heritage, collectors and recreational vehicles spanning all years of production. Thank you for the opportunity to comment on this review.

Within its membership the FOMC represents a number of vintage machinery clubs throughout New Zealand with farmer members. We would like to compliment the authors for what we consider to be a very practical discussion document. Rationalisation of unnecessarily complex rules makes for better compliance and improved productivity. Any change that reduces compliance costs without affecting safety has our full support, as it will have direct benefits for vehicle owners and trickle down benefits for consumers, exporters etc.

To exempt tractors with a 30 kph speed limit (hopefully to be changed to 40 kph) from a licence fee, safety inspection, road user charges, and the need to keep a logbook, and allow them to be driven with a Class 1 licence all have our full support.

The owners of the following tractors usually have no way of passing on compliance costs – heritage and collectors tractors, tractors used for launching recreational boats, those used on hobby farms and lifestyle blocks for maintenance, and lawn mowing and to mow roadside grass verges saving local authorities the job and reducing fire risk.

The Federation makes comments on the follow discussion points as numbered in the discussion document.

Driver licensing and work time rule.

[1] The Federation supports the increase in speed limit to 40kph as most modern tractors are capable of travelling at this speed. Experience by tractor drivers seems to confirm that when travelling at or below 30kph, cars attempt to pass rather than exercise caution, whereas at 40 kph, drivers are more tolerant and tend to wait for passing opportunities. This may have much to do with the gearing of modern cars. We believe this change will simplify the 30/40 kph rules and reduce the potential for rear end crashes and passing risks.

Representing the responsible special interest and heritage motoring enthusiast

[2 and 3] We support the driver licensing Class 1 change and the endorsement as practical given the limited use of tractors on road and their speed limits. The question for clarification arises as to when the endorsement can be gained.

[4] We endorse the work time rule exemption for Class 1 drivers as a change that makes good sense. This requirement has caused real difficulties within the farming sector and we believe that there are ample provisions in the Occupational Health and Safety requirements to manage this issue. The penalties for not complying with those OSH requirements are very punitive .

Inspection , Licensing, registration and RUC

[5,6,7 & 8] Support proposals. Many farmers' tractors are only used on road very infrequently. Those which exceed 40kph must comply with the requirements set out. Periodic inspection is covered by the Health and Safety Act requirements whereby all farm machinery must be maintained in a safe working condition. Few farmers today service their own tractors as they are now more complex machines. The growth of on farm service by trained service agents has vastly changed and simplified maintenance procedures. Such regular service procedures ensure Health & Safety compliance.

We endorse the amber beacon requirement. However we question the need for making it mandatory for a visible 40k sign to be displayed on all tractors. Such a sign, if required, would also need to be placed on all towed equipment, such as feedout wagons, fertiliser spreaders etc where such a sign would not be visible from behind a non cab tractor. We view this as adding to unnecessary compliance costs as the proposal makes it legal for all tractors to travel up to 40kph. Therefore Police need only detect agricultural vehicles exceeding 40kph for the purposes of compliance enforcement to ensure they comply with the requirements of the proposed plus 40 G class. We suspect that there will be relatively few such tractors registered in the G class, and most will be contractors, not the average farmer. We suggest that because tractors exceeding 40kph are required to pass a compliance test and display a class G sticker, it seems a more reasonable proposition to require those vehicles with G status to display their special class in the suggested visible manner. Police then would easily identify any tractor exceeding 40kph without a visible G sticker as committing an offence.

Overweight and dimension vehicle requirements

[9] There has been an issue with axle weights on some harvesters because the single tyres do not meet LT rule requirements. We trust this has been addressed as agricultural machinery used in New Zealand is manufactured overseas to international standards for an international market. Our requirements should not differ from accepted international standards.

[10] Hazard Panels. We assume these are for over dimensional vehicles. It is a complex issue as it is difficult to safely mount rigid panels as they can be easily impact damaged. The dimensions of a vehicle with a revolving hazard light are readily identified during daylight. However at night additional reflective signage is required. Black extension tyres pose a real hazard on dark nights as they are hard to identify. Therefore good hazard panels are a must at night for OD vehicles. These should be mounted on the rear of any vehicle or combination to clearly define the vehicle width. Most operators accept the need to be safe and seen. Consideration could be given to a daylight v night time Hazard Panel rule as few farmers ever operate on road at night.

[11] Support. The real issue remains the requirement to be able to stop in half the clear distance ahead of you. This is a fundamental driver training matter.

[12] Travel Time restrictions do not fit within the Agricultural sectors seasonal harvesting requirements.

[13] Best practice must be followed. There is a lack of awareness of good practice whereby forks must be carried in a vertical position etc. Again education is required and surely this forms part of the subject material examined for granting a licence endorsement.

A simplified safety inspection needs to be just that simplified. There are huge variations in design and specifications between different makes and even different models of the same make. The requirements need to be clear and not ambiguous, or open to different interpretations, and should be spelled out in an inspection manual (VIRM). As tractors that are exempt from safety inspections should be maintained in a safe standard owners need ready access to this manual as does anyone doing a roadside spot inspection. On behalf of our heritage collector tractor clubs we ask that you ensure requirements in the manual are those that were in vogue when the tractor was new i.e. not requiring retrospective changes. As very few heritage tractors have lights, indicators, hazard lights or stop lights an exemption must be included in the manual if the vehicle was manufactured that way or the tractor clubs could be given the option of exemptions similar to the Vintage Car Club's lighting exemption system which is already in the WOF VIRM.

Thank you for considering our submission.

Yours sincerely,
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