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SUBMISSION ON

2011/12 ACC MOTOR VEHICLE OWNERS CONSULTATION DOCUMENT.

ON BEHALF OF THE FEDERATION OF MOTORING CLUBS (FOMC)

The Federation of Motoring Clubs (FOMC) represents more than 125 member clubs covering heritage collector and recreational vehicles spanning all years of production and including cars, motorcycles, commercial and military vehicles, motor caravans, traction engines, tractors and farm machinery.

In our submission on ACC fees last year we supported collecting more of the levy through a petrol tax as it is an efficient means of ensuring cost to the user is proportionate to the accident risk incurred. So we support the proposed 3 cent a litre levy increase for the same reason. We also support the proposed distance based levy on diesel vehicles, as this will reduce the disproportionate cost imposed on our members owning military vehicles, motor homes, and other hobby and recreational vehicles which are a low accident risk as they cover minimal mileages each year.

However it is the collective view of FOMC delegates that linking fee scales to the ages of drivers and vehicles, or other characteristics such as engine size, will result in unfair or counterproductive anomalies. We would contend that there is no statistical evidence to support any presumption that older vehicles can be linked to excessive injury costs. Vehicles over thirty years old are generally owned by older more experienced drivers and are often better maintained and carefully used on only a limited basis. Nor can valid presumptions be made about the risk rating of youthful or inexperienced drivers. There is every chance that a person who has recently passed their driving test will drive more defensively and, although they don't have years of experience, they may in fact take more care than some experienced drivers. Rather than age or engine size more account should be taken of individual driving records. Alcohol impairment features in the more serious accident statistics, often involving repeat offenders. Is there any way these drivers could be charged a greater levy?

We are not aware of any statistics that prove vehicles with larger engines are more accident prone. If there are any that may suggest there is a link between engine size and frequency of accidents or severity of injuries they would need to be insightfully analysed. Using a mean average engine size for example is seriously flawed. If a large engined vehicle and two small vehicles have accidents on the same day the mean average engine size is somewhere in between. Vehicle safety lists can also distort the statistical picture. They are based on crash tests of modern vehicles and accident records, which are influenced by the type of use and the owners' characteristics. Safety conscious buyers are guided by the lists and in time further distort the listings. Some of the safest vehicles have large engines eg Volvo, Mercedes Benz, Cadillac, Rolls Royce, Jaguar, Ferrari, Maserati, Lamborghini. But the last four have attracted unfair adverse reputations because of the way they are driven by some owners, not any inherent safety risks.

It is drivers and riders that cause accidents not vehicles. Drivers with a competitive nature tend to own large motorcycles, sports cars and performance vehicles. But not all performance vehicles have large engines. Encouraging such drivers to own smaller vehicles with a lower ACC levy won't change their driving habits but will increase their vulnerability to death or injury.

Enthusiast and collector vehicles of any age generally travel lower annual mileages, are well maintained and driven carefully by their owners. We appreciate the ACC is clearly aware of this as a discount for vintage vehicles over 40 years old is already provided, and a further decrease in this fee is being proposed. The Vintage Car Club of New Zealand now accepts 30 year old vehicles and the age of the New Zealand vehicle fleet has reduced as most of the older vehicles registered for the road are no longer in everyday use. We submit it is now appropriate to consider changing the vintage/veteran class to vehicles over 30 years of age. Most insurance companies give considerable discounts for these vehicles because they have fewer claims, as the last thing their owners want is even a scratch on their prized heritage vehicle.

In light of the lack of evidence linking veteran/vintage/heritage vehicles to any significant higher level of accident costs or injury statistics we request that all over 30 year old vehicles be exempted from any increase in levies due to the lack of modern safety features or because of their engine size. Many older American vehicles for example do have larger capacity engines but nowhere near the power and performance of modern lightweight smaller engined vehicles. It is the view of the FOMC that in conducting any risk assessment it would be found that older collectable vehicles would match the overall risk category of newer vehicles.

Because a proportion of accidents resulting in injury to cyclists and motorcyclists are caused by other classes of vehicles subsidised defensive riding courses (a possible use of the motorcycle safety levy) and driver education could be a constructive option.

To summarise –

- 1-We support the proposed petrol levy increase and a distance based diesel levy.
- 2-Don't disadvantage new and inexperienced drivers simply because they don't have years of experience.
- 3-If possible target alcohol impaired drivers.
- 4-Don't impose a higher levy on vehicles with larger engines. It is drivers not cars that cause accidents.
- 5-Change the vintage class to 30 years and older (the modern fleet is much newer now than when the 40 year classification was introduced).
- 6-Exempt over 30 year old vehicles from any increased levy due to lack of modern safety features.
- 7-Exempt over 30 year old vehicles from any excess fee due to engine size (see note 4)

Thank you for considering our submission.

Yours sincerely,
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