

This correspondence from:
The Secretary
New Zealand Federation of Motoring Clubs Inc.
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9 April 2009

Dangerous Goods Amendment
Rules Team
NZ Transport Agency
PO Box 5084 Lambton Quay
WELLINGTON 6145
Email: info@nzta.govt.nz

Dear Sir/Madam,

Thank you for the opportunity to comment on the Dangerous Goods Amendment 45001/2.

The NZ Federation of Motoring Clubs (FOMC) represents over 110 clubs with individual membership of 20,000 enthusiasts, catering for cars, motorcycles, trucks and military vehicles, tractors and traction engines, and vintage machinery, covering heritage and collectors vehicles spanning all years of production.

Any rule that the public are not aware of or are tempted to ignore is a silly rule.

Schedule 2 lists dangerous goods in limited quantities, including petroleum distillates (petrol, diesel, kerosene etc.) with a maximum quantity per item of 5 litres (albeit this is an existing rule). Oil companies recommend service stations put no more than 20 litres in a customer's tin. A jerry can on the back of a army jeep holds 4 gallons (just under 20 litres) and the 2 gallon tins mounted to the running boards of many vintage cars hold approximately 9 litres. A partly filled container is more dangerous than a full one, there will be excessive pressure build up on a hot day. How does a boat owner get on filling the portable tank for an outboard motor? As the common use of these containers is contrary to the Rule we urge you to reconsider this proposal.

Regarding Proposal 4, would the requirement of the UN number in a diamond shaped border from December 2010 include all containers of goods in limited quantities including the previously mentioned jerry cans and 2 gallon containers (that often have the oil companies logo or Big Tree Motor Spirit or similar stamped into the metal). If so this will not be a popular requirement with heritage vehicle collectors and a rule they may be tempted to ignore. We strongly recommend an exemption in this situation for historic vehicles or indeed for any of the containers currently in use.

Yours sincerely,

Andrew McClintock
Submission Secretary
NZ Federation of Motoring Clubs