



## **Review of WoF and CoF requirements for Vintage Trucks and ex Military Vehicles**

### **A Submission to NZ Transport Authority (NZTA)**

Following the vehicle standards compliance (2025) consultation; this submission has been prepared by Malcolm Lumsden, military and vintage truck specialist and advisor to the NZ Federation of Motoring Clubs, with the support of the [Hon] Harry Duynhoven, [former Minister of Transport Safety]. Both are past Presidents of the Federation.

Technical advice has also been obtained from Allan Murray, with 50 years of experience as a workshop owner working with 5 vehicle inspection authorities, past President of the Waikato MTA, and past President of the MTA National Repairers Committee.

#### **Summary**

##### **Review of WoF and CoF matters.**

This submission applies to all vintage trucks, (both military and civilian vehicles) as many light military trucks were operated post war as commercial trucks with minor modifications. We acknowledge there is some material that may not be directly related to the proposed change, but we believe it is relevant to reforming the WoF and CoF compliance regime as related to Vintage trucks and Military vehicles.

There are several issues we wish to include in this submission regarding WoFs and CoFs.

1. Vintage trucks owners seek parity with Motorhomes that are now eligible for annual CoFs
2. WoF exemptions for vehicles under 3499kg tare weight and which are operated as unladen vehicles provides an increased safety incentive

#### **Other matters**

3. Simplifying re-entry rules where vehicles have dropped off the Motor Vehicle Register
4. Review of certain certification requirements which we believe are inappropriate
5. Double taxation on fuel
6. TSLs – we believe that these are not required for unladen vintage trucks that are not subject to “hire or reward”
7. Vehicle testing - quality of testers and service provisions
8. Vehicle testing – the interpretation of corrosion has become farcical in our view.

### **Additional information supporting the foregoing bullet points**

#### **1. CoF – 12 monthly**

Owners of Vintage trucks seek parity with Motorhomes that have recently been granted a 12-month CoF. A 12-month CoF should be granted to the small number of low distance use vehicles; most cover less than 500km per annum, which is far less than most motorhomes. This would create no safety issues that we can foresee.

#### **2. WoF exemption - Realignment of Gross Laden Weight vs Tare Weight for Vintage Trucks**

Most 1940s military trucks were operated on a WoF in the 50s to 90s. It is only in recent years this has changed for no good reason that we can see. Such vehicles are low HP petrol-powered trucks with limited road speeds. Today they travel very limited distances. Most are completely unsuitable for laden usage. Many were designed as troop transporters. Vintage Military vehicles that have a tare weight under 3499kg should qualify for a WoF provided their on-road weights never exceed 3499kg. Virtually all these vehicles have drum brakes and being operated unladen would enhance their braking capabilities and safety. There are sufficient penalties should anyone break the Tare weight rule.

#### **3. Simplifying Re-entry into the vehicle fleet – all vintage cars and trucks**

If an over 40-year-old vintage vehicle has fallen off the register, but still has historical records on NZTA's computer system, the original VIN (or manufacturers data plate) and number plates attached, and then passes a WoF or CoF, there should be no impediment to simple re-registration. Recently such a vehicle incurred collective costs of approx. \$3000 to the new owner to get it back on the road. The requirements were mind-numbing including cab and chassis re-certification, vehicle

weighing and a demand for a NZ chassis rating which the certifier refused to do. There were other requirements too numerous to list.

In our opinion, it appears NZTA's draconian interpretation and application of their rules are designed to deter anyone from re-registering a vintage vehicle. Where an owner passes away and the family overlook (or do not understand) the "registration-on-hold" requirement, such a vehicle is then seriously devalued due to the issue of the costly and onerous re-compliance and re-registration process, which discourages buyers from any interest in the vehicle. This matter needs a serious review.

#### **4. Review of justification of certain certification requirements**

Certification of Manufacturers drawbar ratings, pintle hooks on Military vintage vehicles, etc, far exceed the capabilities of the towing vehicles. The couplings do not match any modern linkages. The demand to remove them defaces the vehicle. Certification costs \$500 plus for a rating of 20% or less of the original manufacturer's specifications. This is an unjustified overreach. Certification demands for alterations such as replacement engines or gearboxes of the same make, that were often done many decades ago, are a nonsense as many older military vehicles had engines designed for finite and short term, and a low distance vehicle life.

#### **5. Double taxation on fuel**

Petrol powered vintage Military Vehicles with tare weights under 3499 kg, but GLW over 3500kg are required to both pay tax at the pump and run a hubometer. This is double taxation and an unjust anomaly which should be removed.

#### **6. Transport service licences**

Vintage Heavy Vehicle owners not using their vehicle for hire or reward, or laden for private business use, should be exempt from the requirement of having a TSL. Many owners have TSLs for other vehicles, but it is an expensive, onerous and unnecessary impost on vintage vehicle owners.

#### **7. Vehicle Testing – quality of testers and service provisions**

Serious and costly issues are arising from testers' lack of understanding of the VIRM in relation to knowledge of tolerances and also the construction of older vehicles. This has long been a concern raised by vintage vehicle owners. Vintage vehicles are a minor part of the fleet. The situation continues to be problematic with the retirement of many old-school qualified mechanic testers. Owners of vintage vehicles nowadays need to know the VIRM requirements. Matters will only deteriorate more unless Testers qualified in original technology are identified and appointed, and are available upon request.

#### **8. Vehicle testing – interpretation of Corrosion, previously known as rust**

Originally corrosion or rust failure was limited to structural areas of a vehicle. Today any area with even minimal observations of minor surface corrosion is used as grounds for rejection. Even a scratch on a panel qualifies, with cases where testers have required the area be repainted. A farmer had a wellside Ute, which had visible

paint damage from normal farming use.. He was required to get it sandblasted, inspected by an engineer and painted. It is very difficult to get such vehicle owners to put these matters onto paper. For older Military trucks minor corrosion can be an issue no matter how much effort is employed to maintain these vehicles. The new standards applied by testers are farcical and exceed the bounds of rational decision making and we believe contrast to the intent of the regulations. A review is sorely needed in our view.

## **Conclusion**

As you will see, this paper has been prepared with expert knowledge and experience and outlines a number of specific points and areas of regulatory rectification in a low volume but important vehicle sector .... vintage trucks and vintage military vehicles are a very important part of NZ's motoring and social heritage and fully deserve our collective support, thereby preserving the authentic stories and legends that they represent.

This submission has the full support of the NZ Federation of Motoring Clubs Inc, and its Executive Committee. I know that the authors of this paper, Malcom Lumsden and Harry Duynhoven, would be pleased to discuss these matters further with NZTA and Ministry officials if required, in person or by other means. Contact details for Harry are below.

In the interests of transparency and good relationships, I will also forward a copy of this paper to the Minister.

Thank you



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