SUBMISSION ON: FUEL CONSUMPTION INFORMATION RULE 33020

ON BEHALF OF THE FEDERATION OF MOTORING CLUBS (FOMC)

The Federation of Motoring Clubs (FOMC) represents approximately 100 member clubs ranging from cars to motorcycles, commercial and military vehicles, traction engines, tractors and farm machinery, covering heritage and collectors vehicles spanning all years of production.

At the bottom of page 11 and top of page 12 of the overview you ask if the database should record fuel consumption unknown if the owner has made a reasonable effort to obtain the information but it is not available. The FOMC thinks it is important that such a provision is made in the rule requirements on page 9, 3.9 (3). This is covered by the wording – if the vehicle is a low volume production vehicle and the owner demonstrates that fuel consumption information is unavailable the vehicle inspector or inspecting organisation may record fuel consumption information as unknown. However under definitions in part 2 you define low volume as being 200 units or less per annum, this is far too restrictive. There will be a number of other vehicles for which fuel consumption data is not available. We recommend 3.1 (3) should state – if the vehicle is a low volume production vehicle or a special interest vehicle or the manufacturer is no longer in business and the owner demonstrates that fuel consumption information is unavailable, the vehicle inspector or inspecting organisation should record fuel consumption information as unknown.

Test procedures – the vehicle speeds used in the Japanese 10-15 test cycles have little relevance to the NZ road conditions we are familiar with. There is no description of Canadian or US test procedures. The media and general public often refer to American gas guzzlers after reading US fuel consumption statistics, unfortunately they forget that a US gallon is only 3.78 litres. Modern American vehicles use no more fuel than similar sized vehicles from Europe or Japan.

Your proposal to quote litres per 100 kilometres as a standard is excellent and will create a level playing field.

None of the test methods mention fuel quality or octane, our fuel quality is not as high as that used in some parts of the world, vehicle owners may not get the quoted economy through no fault of their own unless they use the same fuel.

Fuel economy is not as simple as litres per 100 kilometres, a small economy vehicle with 1 occupant using 6 litres per 100 kilometres may sound efficient but a large car with 5 occupants using 8 litres per 100 kilometres equates to1.6 litres per 100 kilometres per person (little more than a powercycle).

On page 16 of the overview under safety and personal security you state – there are no safety and personal security issues associated with the proposed rule. However encouraging more people into smaller cars may compromise road safety, however we feel this is far outweighed by less congestion and less pressure on parking.

Yours sincerely,

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