

This correspondence from:
The Secretary
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SUBMISSION ON LAND TRANSPORT (ROAD USER) AMENDMENT RULE 2013 RULE 61001/8

The NZ Federation of Motoring Clubs represents approximately 130 member clubs catering for motor caravans and heritage and collectors vehicles including cars, trucks, military vehicles, tractors and motorcycles covering all years of manufacture. Our member clubs represent more than 60,000 individuals.

While we agree with any moves to reduce deaths and serious injury to child passengers and generally support the intention of this rule amendment, we suggest a cost/benefit analysis in your yellow draft would have been helpful. We would also be interested in statistics relating to goods service vehicles with an unladen weight exceeding 2,000kg as these are the vehicles the proposed new rules will apply to. The statistics you provide on page 5 relate to children in cars, vans and sports utility vehicles, and are not directly relevant to the rule changes being proposed.

Around the country some truck drivers/operators and heritage vehicle owners provide rides to under-privileged children in fund raising events for charity (Child Cancer in the case of the Canterbury events). Obviously the drivers won't want to buy booster seats for these occasions, and it would be a shame if such beneficial fund raising projects became impractical because of safety regulations.

On page 1 of your question and answer section under proposed changes

No 1, Extend the use of child restraints to passengers under 7 years if a child restraint is available

Comment – This means 6 year old and younger.

In the rule section

No 7 Amend – Drivers must ensure passengers under 5 years use child restraints

Replace 5 with 7

Comment – Again this would mean 6 year olds.

No 8 – Replace under 8 years with aged 7

Comment – This is exactly the same i.e. 7 year olds.

We find this confusing and presume the new rule will apply to all children without a medical exemption prior to their eighth birthday i.e. 7 year olds and under.

To summarise –

No 1 – Do the statistics for deaths or serious accidents for good service vehicles exceeding 2,000kg unladen warrant the proposed changes taking the cost/benefit analysis into account.

No 2 – Could exemptions be allowed for special events e.g. charity, fund raising, truck shows etc?

No 3 – We are not in favour of the proposed changes unless exemptions are provided as mentioned in No 2 above.

Thank you for considering our submission.

Yours sincerely,
Andrew McClintock.
Submissions secretary NZFOMC

Representing the responsible special interest and heritage motoring enthusiast