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Safer Journeys Road Safety Strategy 2020

Introduction

The NZ Federation of Motoring Clubs (FOMC) is an incorporated society representing over 120 clubs with individual membership of some 20,000 enthusiasts who collectively own approximately 30,000 special interest vehicles comprising cars, motorcycles, trucks and military vehicles, tractors and traction engines, and vintage machinery spanning all years of production.

Our comments on the relevant areas of concern in the discussion document follow.

Reducing the impact of alcohol/drug-impaired driving

The FOMC is not opposed to reducing the BAC limit to 50mg per 100ml with the appropriate penalties, and introducing a zero limit for drivers under 20 years. However, like other commentators, we believe reducing the BAC limit is a side issue and more emphasis must be given to addressing repeat offenders and hard-core drink drivers with alcohol interlocks, vehicle impoundment, licence cancellation, heftier fines and the like. The FOMC is also in favour of random drug testing for both illegal drugs and alcohol.

Increasing the safety of young drivers

The FOMC sees a number of 15 and 16 years olds driving classic and collectable cars and motorcycles. Some of these youngsters own such vehicles and are often seen driving their own vintage tractor to and in tractor trials. If the historic collectable vehicle fleet is going to survive these future collectors must be encouraged. We believe learner drivers start out cautious but after a year or two they get over confident. This happens regardless of the age they start driving. If the driving age was raised to 16 or 17 they would become over-confident at 18 or 19. We say leave the minimum driving age at 15 and increase road safety education at schools. This should be a mandatory component of the curriculum – after all, every pupil can be expected to graduate to become a road user, so it could be argued that road skills, and even obtaining a car (or motorbike) licence, is more important than some of the traditional subjects.

Mobility is important to New Zealanders, especially those in rural areas. We feel rural accident statistics may be misleading. Remember rural residents travel further and on open roads. Even if they drive more carefully the statistics won't be as good as the urban populace. A zero alcohol limit for under 20 year olds should help improve the statistics for young drivers.

Power restrictions for young drivers sounds sensible but defining power is difficult. Would it be power to weight, or cc rating, or engine horsepower, or acceleration or top speed? Small eco-friendly shopping cars are capable of over 150km/h. Some of our collector vehicle have large motors but are very docile. We had cc ratings on learner motorcyclists in recent times; we knew of an example of a young rider who was able to ride his modern 250cc Japanese bike but couldn't ride his newly restored classic 500cc Triumph with about half the speed and acceleration of the 250.

Safer roads and roadsides

We have serious reservations about turning traffic giving way to pedestrians. Could this mean pedestrians would be able to cross in front of a turning vehicle only to be trapped in the centre of the road waiting for the other straight ahead traffic to clear? Or will it cause left-turning traffic to stop suddenly and risk a rear-ender? This seems a dangerous proposal and should be rejected.

We support the concept of safer roads and roadside design, so that motorists receive subliminal signals to travel at the appropriate (safe) speed. The recent accident in Christchurch, in which three car passengers died in a single-vehicle crash at just 40km/h (despite wearing seatbelts and the car being fitted with airbags) could be less due to the drivers fatigue, and more due to the infrangible power pole they struck. Would they be alive if the power pole was designed to collapse upon impact? It's unacceptable with modern cars for roadside furniture to kill people at urban speeds. Perhaps, instead of the current focus of enforcement, blame and punishment for road crashes solely on the driver, we should adopt a 'shared responsibility' mentality where road controlling authorities are also prosecuted for unsafe road design that contributes to injuries and fatalities.

Safer speeds

We don't recommend introducing more speed limits. 40km/h school zones, 50km/h, 60km/h, 80km/h and 100kph should suit most if not all situations. The existing speed limits seem satisfactory at our present traffic levels. Different speed limits for different classes of vehicles is a mistake. Having all traffic travelling at a similar speed assists traffic flow. Introducing additional speed limits will only cause more confusion. Simply enforce the existing limits, and provide more education on driving to the conditions. Introducing additional speed limits is unnecessary at this time, with the exception of the 40km/h school zones. The FOMC also supports introducing higher demerit points and lower fines for excessive speeding.

Increasing the safety of motorcycling

As the FOMC represents a number of motorcycle clubs we are qualified to comment on this. Motorcycle use is increasing as are accident and injury related claims. The accident rate is higher than other vehicles but not all accidents are motorcyclists fault. Drivers don't see them. Let's face it people drive in front of trains that have their lights on and claim not to have seen the train. How can we expect them to see a motorcycle or cyclist? The FOMC believe motorcycle use should be encouraged. They save fuel, reduce emissions, reduce traffic congestion, free up parking spaces (and they are fun to ride). Making their use safer is important, and we support the new rule requiring daytime lights. However, you can legally ride a motorcycle in bare feet and shorts provided you wear a helmet – is this good enough? Protective clothing is a must, boots, leathers or suitable over-trousers and a suitable jacket and gloves are essential. High visibility clothing is a must for all cyclists and motorcyclists, and the FOMC would recommend requiring high visibility vests be worn at all times.

The description of motorcycle black spots is accurate and we encourage you to target these. We don't see the need for dedicated funding or concentrating on popular motorcycle routes. Repairing the hazards identified is in everybody's interest.

We endorse the power to weight ratio limit as opposed to a 250cc limit for learner riders. The FOMC endorses additional training for learners provided additional costs are not prohibitive.

The definition of a moped appears to have changed over the years. A moped was originally a bicycle with an auxiliary motor fitted hence the name moped (motor and pedals). In the 1950's pressed steel frame versions became available. They still had pedals as an alternative means of propulsion. Now any small motorcycle or scooter of less than 2 kilowatts is a moped. The skills required to ride a moped have little to do with driving a car, it has more in common with riding a bicycle. However having a car licence proves you have the knowledge of the road rules. Alternatively the Class 1 licence requirement for moped riders could be replaced with a full motorcycle (Class 6) licence.

WoF testing may be reasonable for these modern small motorcycles and scooters but would be totally impractical for the older mopeds described above. They have bicycle type stirrup brakes, bicycle lighting, a bell (not a horn), no stoplight (and no way to fit one) and new tyres would barely have 1.5mm of tread depth. Testing classic 'mopeds' for a warrant is impractical, and so there would need to be an age-based exemption if any such regime were imposed.

Improving the safety of the light vehicle fleet

The emission rules and the frontal impact rule prevents the import of older second-hand 'modern' cars, and no doubt ESC will become compulsory from a future date (provided it only applies to vehicles manufactured after a certain year). The average age of the domestic fleet will reduce without a cut-off date for mainstream imports being required. The FOMC has genuine concerns about compulsory scrapping and a blanket age restriction for all imports. Collectors vehicles and classics must be exempt from compulsory scrapping or any age-related ban. We now have a global market with the internet and classic and collectable vehicles change hands and are exported and imported worldwide.

On page 34 you refer to a possible relaxation of the WoF frequency for new vehicles. The FOMC has been lobbying for 12-month WoF's for collectors vehicles aged of 40 years. They are seldom used during the winter months, stored under cover, well maintained and travel very low mileages, so we would support moves to relax the 6-monthly requirement, especially for vehicles over a certain age, or those which travel minimum annual mileages.

Safer walking and cycling

We support initiatives to make pedestrians and cyclists safer by adding more 40km/h school zone speed limits, making drivers more aware of pedestrians and cyclists, and mandatory cycle and road rule skills training in schools, and safety around school buses.

Road safety education

The road code used to be free and it was common to find a copy in a vehicle glovebox. We wonder how many drivers really understand the road rules today? The only people who buy a road code are those about to sit their licence. We suggest the road code should be made available free even if it's a simplified glove box edition. More could also be done to advertise road rules, and especially when there are changes such as new pedestrian crossing and roundabout rules, and ban on hand-held cellphones etc.

Summary of proposed initiatives

As we represent a large number of diverse clubs it's difficult to prioritise the initiatives, however we would like to comment on other issues in your summary. On page 52, the FOMC believe the learner driver age should remain at 15, however this is not given as an option so the results from this survey will be misleading.

The suggestion of introducing different motorcycle ACC levies based on engine size would be unfair to collectors with 500cc and 650cc early English motorcycles, and those with classic 800cc to 1,000cc Harley Davidsons and Indians etc. All these older motorcycles are docile and slow by today's standards, and tend to be ridden infrequently by their owners. Instead we recommend the introduction of a power to weight ratio-based graduated fee (kilowatts per tonne), like that proposed for Learner and Restricted riders.

The FOMC also supports calls from road safety advocates to make driver education and advanced or refresher driver training a greater priority.

In terms of ranking, we would prioritise the areas of concern as follows:

1. (Alcohol) – address recidivism through a zero BAC for repeat offenders.
2. (Raising Awareness) – reinvigorate our education and advertising to improve understanding of the risks and consequences of speeding.
3. (Raising Awareness) – promote high visibility and protective clothing for motorcycles.
4. (Alcohol) – introduce a zero BAC limit for certain drivers (drivers under 20 years, adults without a full licence, commercial drivers).
5. (Road and Roadsides) – implement targeted programmes to address run off road, head-on and overtaking crashes on high volume high risk roads.
6. (Older Road Users) – focus road and roadside improvements on sites where there have been a high proportion of crashes involving older road users.
7. (Walking and Cycling) – support the roll-out of strongly enforced variable speeds around schools and address the issue of rural school bus safety.
8. (Walking and Cycling) – add specific walking and cycling questions into driver licence testing so drivers are more aware of pedestrians' and cyclists' safety needs.
9. (Walking and Cycling) – increase cyclist skill training in schools.
10. (Alcohol) – reduce the legal adult limit to 50mg per 100ml.
11. (Raising Awareness) – raise awareness of young driver crash risk and the reasons for the graduated driver licensing system.
12. (Raising Awareness) – inform New Zealanders about the impact of alcohol on driving.
13. (Raising Awareness) – have stronger promotion of road user education, including targeted messages and more national promotion, such as "share the road".
14. (Roads and Roadsides) – change the give way rules for turning traffic (*but not pedestrians*).
15. (Raising Awareness) – expand road safety education for older New Zealanders (e.g. greater availability of refresher driver training).
16. (Raising Awareness) – increase the benefit of school road safety education by developing a specific road safety education programme in secondary schools.
17. (Walking and Cycling) – investigate options to improve safety around rural schools and school buses.
18. (Raising Awareness) – encourage the use of safer vehicles by older drivers through a targeted campaign.
19. (Road and Roadsides) – support a targeted programme for high risk urban intersections.
20. (Motorcycling) – introduce a specific programme of treatments for motorcycle black spots.

Yours sincerely,

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NZ Federation of Motoring Clubs