

30 May 2013

Vehicle Standards Compliance Amendment (No 2) 2013
Rules Team
New Zealand Transport Agency
P O Box 2480
WELLINGTON 6140

**SUBMISSION on
Vehicle Standards Compliance Amendment (No 2) 2013**

Introduction

Thank you for the opportunity to make a submission on the Vehicle Standards Compliance Amendment (No 2) 2013.

This submission is from Consumer NZ, New Zealand's leading consumer organisation. It has an acknowledged and respected reputation for independence, and fairness as a provider of impartial, and comprehensive consumer information and advice.

Contact: Hamish Wilson
Consumer NZ
Private Bag 6996
Wellington 6141
Phone: 04 384 7963
Email: hamish@consumer.org.nz

1. Initial inspection for light vehicles and then no further WOF inspection for three years.

Consumer NZ supports this proposal.

2. Annual WOF for light vehicles over three years old, and first registered on or after January 1 2000.

Consumer NZ *does not support* this proposal. As previously submitted, we consider an *annual inspection for all vehicles* from three years of age is sufficient.

We suggest further measures to encourage safe vehicles could include:

- Improved checks on steering, suspension and anti-lock braking systems.
- A mandatory test drive for all WOF inspections.
- Increased effort by Land Transport NZ to ensure all WOF inspections are of a similarly high standard, without being overzealous and failing items that are still serviceable, such as tyres which still have adequate tread depth.

- Introducing a simple way for motorists to challenge any WOF decision that appears to be no more than an attempt to gain unjustifiable repair business.

Alternatively, six-monthly inspections for light vehicles aged 15 years to 40 years would be supported by Consumer NZ.

Consumer NZ agrees that it is correct to expect the number of defects will increase with age, and that it is appropriate to inspect more frequently where the risk is highest.

However, we do not agree that fixing a date is appropriate, as vehicles registered after 1 January 2000 will continue to age, to wear out and to rust, which increases the risk to motorists.

- Studies of the reasons for WOF inspection failures by the MTA and NZTA indicate that there are increasing failure rates due to suspension or steering defects, and structural /rust problems from 15 years of age.
- Suspension and steering defects are a factor of wear and tear from distance travelled which increases with age. Improvements in vehicle quality post 2000 are not as significant as those achieved in the two decades prior to the year 2000.
- While rust is no longer the issue it was in pre-1985 vehicles, the 2011 MTA/NZTA report shows 26,210 vehicles which were first registered between 1991 and 1995 failed due to rust/structural defects. These old vehicles, aged 16-20 years had the benefit of improved rust treatments introduced in the late 1980's. Rust in vehicles 15 years and older is inevitable in our largely coastal cities.
- Within three years of the proposed change, vehicles which are over 16 years old will only require an annual inspection, which means rust and suspension or steering defects have a full year to progress.
- Vehicles older than 15 years have low residual value, and are likely to be owned by people who have limited ability to afford full servicing, so safety defects will only be found at a WOF inspection.

3. Inspection frequency for veteran and vintage vehicles.

Consumer NZ agrees with the definitions:

- Veteran vehicles are those manufactured before 1 January 1919.
- Vintage vehicles are those manufactured after 1 January 1919, and which were manufactured or first ever registered 40 years before the most recent date of relicensing.
- **Consumer NZ supports annual WOF inspections for veteran and vintage vehicles.**

4. Certificate of Fitness; Heavy Vehicles.

Consumer NZ supports the proposal for variable inspection frequencies being changed from 3 – 9 months to 3 – 12 months.

5. Certificate of Fitness; Light rental vehicles.

- Consumer NZ supports annual inspections for the first two years from new, followed by 6-monthly inspections.
- A wider range of agencies should be authorised to issue COF to light vehicles.

6. Mitigation of safety risks:

- We support the concept of ongoing education programmes including advertising campaigns to encourage vehicle owners to ensure their vehicles are safe.
- Consumer NZ also supports increased enforcement, especially roadside inspections of tyre condition, lights and windscreen wiper operation.
- We suggest discretion be given to Police and Traffic Wardens to issue a Notice to Repair as an alternative to an infringement fee for items like worn tyres or faulty lights. Failure

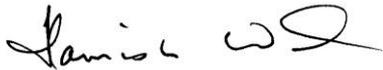
to provide evidence of a repair within 7 days would result in an infringement notice being issued.

7. Phasing in of the changes.

We have no opinion on this.

8. Agricultural Vehicles.

We support the inclusion of the recent changes for agricultural vehicles

A handwritten signature in black ink, appearing to read 'Hamish Wilson'.

Hamish Wilson

Research and Testing Manager

DDI 04 801 0412

Fax 04 385 8752