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Regulatory Stewardship (Omnibus) Amendment Rule 2020
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Introduction

The New Zealand Automobile Association (NZAA) welcomes the opportunity to provide comment on the Regulatory Stewardship (Omnibus) Amendment Rule 2020.

The NZAA is an incorporated society with over 1.7 million Members. It represents the interests of road users who collectively pay over \$3 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. The NZAA's advocacy and policy work mainly focuses on protecting the freedom of choice and rights of motorists, keeping the cost of motoring fair and reasonable, and enhancing the safety of all road users.

Comments on the relevant proposals for which we have feedback are provided below:

Land Transport Rule: Glazing, Windscreen Wipe and Wash, and Mirrors 1999

Proposal 2: Update the Glazing Rule to reflect that where the term 'mirror' is used, it can be substituted for a camera-monitor system provided the vehicle meets an approved safety standard.

The NZAA supports this proposed amendment which recognises that vehicle technology has evolved and that cameras are now substituting the use of mirrors, and indeed some cameras are being mounted on the wings and even look like mini wing mirrors. This will ensure the Glazing Rule is up-to-date and remains fit for purpose.

However, we do query the safety risks if vehicles only fitted with camera monitors suffer damage, malfunction or the cameras are otherwise obscured. A car or motorcycle can be driven without mirrors (provided the driver/rider turns their head) but this is not the case for trucks and buses. Such a scenario would mean the vehicle should not be driven if conventional mirrors were not fitted, which would put productive commercial vehicles out of service for some time, but would this happen in practice?

To minimise any safety risk we suggest that the change to the Rule relates to camera-monitor systems that have been fitted by the manufacturer, but not aftermarket or retro-fitted items (in which case the factory mirrors should be retained) (or is this ensured by s5.4(3) of the Glazing Rule?). This would ensure that such vehicles are likely to be fitted with an array of safety systems which will help compensate if a camera is damaged and so would be less likely to render the vehicle inoperable.

Land Transport Rule: Passenger Service Vehicles 1999 (PSV Rule)

Proposal 5: Update the PSV Rule to allow for the rear door emergency button on a Passenger Service Vehicle to be disabled while the vehicle is stationary during a driver's rest break.

While the NZAA supports this proposal, the draft wording of new clause 2.2(6A) of the PSV Rule does not meet the statement in the overview that “the door must be automatically activated as soon as the bus is in operation”, a requirement we support. The wording in the clause simply says that the bus must be stationary (and only occupied by the driver), but a stationary bus could still be in operation (i.e. travelling to a bus stop but stopped at intersection, and temporarily with no passengers). For safety reasons, we agree that the bus should not be in operation, i.e. the engine must be switched off, and this should be specified in the Rule (and the equivalent ‘drive’ not engaged for electric buses). Upon engaging the engine, all doors must be activated again.

Therefore we suggest new clause 2.2(6A), subclause (a) should be more explicit by specifying that the motor of the passenger vehicle is not engaged.

Yours sincerely



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