

**AA Submission: Steering Systems Amendment Rule
(20 Aug 2008)**

20 August 2008

Steering Systems Rule Amendment
Rules Team
Land Transport New Zealand
PO Box 2840
WELLINGTON
Email: info@nzta.govt.nz

Dear Sir/Madam

STEERING SYSTEMS AMENDMENT (Rule 32003/2)

Introduction

The New Zealand Automobile Association (NZAA) welcomes the opportunity to provide comment on the draft Steering Systems Amendment Rule.

As an organisation with a membership exceeding 1.2 million vehicle owners and drivers in New Zealand, close attention is given to any proposals that relate to vehicle compliance standards.

The NZAA is supportive of the proposals in the draft Rule. We consider the proposals to be relatively benign, and endorse the views of enthusiast groups like the Federation of Motoring Clubs and Left Hand Drive Enthusiasts Federation in seeking to ease the rules for registering less-than 20-year-old specialist LHD vehicles.

As with our comments on the Frontal Impact Rule Amendment Rule (32006/3), and subsequent post-consultation paper, the NZAA is supportive of the creation of the Special Interest Vehicle (SIV) category, and approves applying similar criteria to the Steering Systems Rule.

As we said at the time (20 September 2007): "It is the NZAA's view that the enthusiast market should not be unduly disadvantaged by rules that are targeted at the bulk of mass-market vehicles intended for daily use. The small numbers of non-compliant UCVs [SIVs] that might be imported, or indeed are already in service in NZ, tend to be driven sparingly and for that and other reasons do not pose an undue safety risk. We therefore support the LTNZ proposal for there to be some level of exemption for the import of non-compliant UCVs."

Our comments of specific sections of the draft Rule for which we have comment follows:

Comments on the draft Rule (Section 4)

PART 1

Category A: Special interest light vehicles less than 20 years old

We support the conditions listed in Category A in order to certify less-than 20-year-old LHDs for service into NZ, including not operating the vehicle for commercial purposes.

We do note that immigrants or returning citizens importing vehicles less than 20 years of age must also meet this criteria (i.e. the old 'baggage' vehicle clause is to be removed from the Rule), and we support this change. If immigrants' or returning citizens' vehicles do not meet the new SIV criteria, then they should not be able to be registered, just as a New Zealand resident

attempting to import the same vehicle would not be able to register it. LHD vehicles imported by immigrants or returning citizens are more likely to be used as primary vehicles, so they must either comply with the same Rules like all other NZ-new or used imports, or only be exempted if they meet the SIV criteria.

We also note the concerns of other submitters that the overview refers to the vehicle being imported for the “importer’s own personal use” when in fact the wording in the Rule refers to the “owner”. These may not be the same people, and it is entirely reasonable that the first NZ owner (i.e. SIV permit holder) may engage the services of a third party to assist with the import process. We suggest the reference to “owner” (including trustees) in the Rule is correct, but that any references to “importer” in associated guidelines or forms be replaced with “owner”.

Category B: Light vehicles that are 20 years old or more

The NZAA supports retaining the existing exemptions for LHD vehicles which are more than 20 years old, and we approve of removing the restriction on individuals only being able to import one such LHD car in a 12-month period. Similarly, we endorse the only condition of not operating the vehicle in a commercial transport service.

We have no comment on the other categories.

PART 2

Application for Category A Left-hand-drive Vehicle Permit:

We have no comment on this section but endorse the various conditions imposed.

Issue of Category A Left-hand-drive Vehicle Permit:

As we have previously noted, the NZAA supports the published definition of a Special Interest Vehicle, and likewise endorse the inclusion of the additional criteria for a Left-hand Drive Vehicle Permit, 3(a)(ii), that the vehicle “is a model that was not manufactured in right-hand drive...”

As for criteria 4(a) we are a little concerned that the list of magazines may be restrictive, and not particularly relevant for vehicles sourced from LHD markets. So we urge that not only in the Rule, but in associated documents, that it be made clear that this list is not exhaustive, and that applicants should be able to submit other legitimate, syndicated titles (or their websites) from other markets (including non-English titles) that identify the vehicle in question as being a collectors item. Alternatively, the list of titles in the Rule may need to be expanded to incorporate mainstream magazines from LHD markets.

Finally, under clause 5, the NZAA submits that the proposed annual quota for 500 Category A LHD permits is more than sufficient.

Yours sincerely

Mike Noon
General Manager Motoring Affairs
New Zealand Automobile Association Incorporated