

**AA Submission: Tyres & Wheels Amendment Rule 2009  
(9 April 2009)**

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Tyres and Wheels Amendment  
Rules Team  
NZ Transport Agency  
PO Box 5084 Lambton Quay  
WELLINGTON 6145

Dear Sir/Madam

### **TYRES and WHEELS AMENDMENT 2009 (Rule 32013/5)**

#### **Introduction**

The New Zealand Automobile Association (NZAA) welcomes the opportunity to provide comment on the Tyres and Wheels Amendment Rule.

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

We circulated the draft Rule for comment to our 17 District Councils. The NZAA District Councils are representative of the membership and deal with policy issues. Comments on the four proposals are provided below:

#### **Proposal 1: Requirements for winter tyres**

The NZAA supports this proposal. Along with other organisations, we have previously voiced our concerns about the safety of winter (or 'snow') tyres and called for their permitted use to be reviewed. The NZAA is persuaded by the evidence presented by the testing of mixed winter and summer (standard) tyres, and therefore we support the proposal to require any light vehicle fitted with snow tyres to have them fitted on all four wheels as this addresses the risks posed by mixing tyres.

However, the NZAA doesn't believe this proposal goes far enough, and we have some additional suggestions.

As part of the WoF inspection, where a car is correctly fitted with four snow tyres, the owner should be informed in case they are unaware, and advised of the requirement to match tyres in the event any need replacing, and the safety reasons for doing so. This could be through noting the WoF checksheet and referring them to advice on the Land Transport NZ website, but consideration should be given to producing a leaflet to hand out to owners on the safety risks of mismatching tyres, including owners of vehicles which fail WoFs due to mismatched winter and summer tyres. Likewise, we support the suggestion from the Independent Motor Vehicle Dealers Association that motor vehicle dealers be required to declare that a car is fitted with (four) winter tyres, with buyers acknowledging this by signing the CIN window card.

The NZAA is also concerned that the requirement to match snow tyres on all wheels could lead to a growth in demand for second-hand snow tyres, particularly when an owner is faced with replacing a worn pair (i.e. the front axle) of an otherwise complaint car, as this will be cheaper than purchasing four summer tyres. We are concerned that traction and handling may still be compromised by four old and used snow tyres, despite meeting minimum standards, compared

to the safety offered by summer tyres. To minimise this risk, we believe a minimum tread depth should be imposed for snow tyres which differs to that for summer tyres. We understand Japan imposes a minimum 50% wear (from new) for snow tyres (which equates to about 4mm versus 1.5mm for summer tyres in NZ) and we would support adopting similar standards here. This will reduce the availability of old and worn snow tyres (but legal at a 1.5mm tread depth), and therefore may encourage owners to fit replacement summer tyres which we believe should be the desired outcome of this Rule amendment. While the NZAA does not support a ban on (new or used) snow tyres outright, we consider the safety of the fleet will ultimately be improved if used snow tyres are progressively replaced with summer tyres, excepting those motorists who have a genuine need for snow tyres.

Additionally, we suggest this Rule change be supported by sufficient training of WoF inspectors so they can correctly identify what is, or is not, a snow tyre, and that this should include revising the Vehicle Inspection Requirements Manual to include photos of examples (i.e. tread pattern and symbols). If inspectors are unsure, we would support reference in the Rule to allow them to take into account advice from a tyre fleet serviceperson verifying the type of tyre, similar to that in Proposal 2.

**Proposal 2: Inspection requirements for visible cords in the tread area of heavy vehicle tyres**

The NZAA supports this proposal with reservations. We recognise that the current Rule does not permit heavy vehicles to have visible cords in the tread area, yet we understand heavy tyre specialists are able to verify the relative safety of such damage (particularly if only the outer cord is exposed). However, the 'tyre fleet service person' must be sufficiently qualified or experienced, the assessment should consider the likely distance the tyre will travel with an exposed cord between CoFs (and subsequent wear), and the CoF inspector should only seek expert opinion for guidance rather than defer the decision to the expert. Ultimately, the decision to pass or fail a heavy tyre must rest with the inspector.

Therefore we support the amended wording of Clause 2.3(5) as proposed.

**Proposal 3: Change to requirements relating to the sum of the load ratings of the tyres fitted to a vehicle axle**

The NZAA does not support this proposal as we believe it is a retrograde step in the interests of heavy vehicle safety.

In our view there is a risk that, in order to cut costs, heavy transport operators will take advantage of this relaxation by only specifying tyres that comply with the average loadings, and not the maximum loading that the vehicle may occasionally carry. For example, if a 44 tonne container truck usually only carries loads in the 30 tonne range, then the operator will specify tyres to suit. But on the few occasions it may carry a maximum 44 tonne load, it is unrealistic to expect the operator to replace the tyres for that occasion. We don't believe it is reasonable to only enforce this at the roadside, and we disagree with the assertion in the discussion document that there would, therefore, be 'no adverse safety implications' from changing this requirement. Safety can only be guaranteed if the tyres are specified up to the maximum Certificate of Loading for that vehicle at all times, as the current Rule requires. We believe if an operator never requires a truck to carry loads up to its maximum carrying capacity, then they will probably specify a truck and trailer axle combination to suit.

However, the NZAA recognises that motorhomes are a particular class of heavy vehicle that typically operates significantly below their maximum allowable load, and we concede that they could be specifically excluded from the current requirements of the Rule. Therefore, rather than

delete subclauses 2.3(10) and 2.3(11) as proposed, a subclause could be added that “Clause 2.3(10) does not apply to heavy motor vehicles constructed as motorhomes.”

**Proposal 4: Removal of requirement for space-saver tyre labels to be approved**

The NZAA supports this proposal on the proviso that instructions to WoF inspectors clearly specify the minimum label standard that is acceptable. For example, the Vehicle Inspection Requirements Manual presently illustrates the current approved label design, and we recommend that this be updated to include illustrations of typical (acceptable) labels from common markets such as Japan, Korea, Europe, Australia and the USA.

**Run flat tyres**

The NZAA has corresponded with the Motor Trade Association, and studied the technical bulletin from South Pacific Tyres, regarding the recommendation not to mix standard tyres with ‘run flat’ tyres on a vehicle. This appears to be similar to the snow tyres issue, that is, the different construction of run flat tyres means handling could be compromised when mixed with standard tyres on the same vehicle. Although we have not consulted our District Council’s on this issue, we believe a similar ‘non-mixing’ provision should be considered, and we would be prepared to support it. Similarly, this provision could include a requirement that run flat tyres shall only be fitted to vehicles with electronic tyre pressure monitoring systems.

Yours sincerely

**Mike Noon**  
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**NZ Automobile Association Incorporated**