

**AA Submission: Proposed Amendment to NZS 5413:1993  
– Code of practice for the manufacture and use of  
stockcrates on heavy vehicles  
(11 March 2010)**

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Dear Oliver

### **SUBMISSION ON THE PROPOSED AMENDMENT TO NZ STANDARD 5413:1993**

The New Zealand Automobile Association (AA) welcomes the opportunity to make a submission on the proposed amendment to NZ Standard 5413:1993 – Code of practice for the manufacture and use of stockcrates on heavy vehicles. Specifically the Ministry of Transport proposes banning the discharge of effluent through trucks' stopper tubes, and or, making it a requirement for vehicles with a gross vehicle mass of 6000kgs or greater, used for carrying livestock, to be fitted with effluent containment devices in accordance with the Standard.

The AA represents over 1.3 million Members on issues affecting motorists. Accordingly, we continue to have a particular interest in supporting measures that work to minimise the incidences and volumes of livestock effluent discharged onto the national roading network. The AA is, therefore, very supportive of both of these proposed changes being incorporated into the Standard.

The AA is a member of the National Stock Effluent Working Group and it is working collaboratively with industry groups to address all aspects of the problem. Industry compliance through regulation is an important component and the AA believes it is well overdue that livestock transporting trucks have the necessary tank storage capacity to contain the effluent of the livestock being transported.

Livestock effluent discharged onto the roads and roadside affects many groups and communities of New Zealand. It impacts on the environment, on public health, and it presents an unfavourable visual and sensory experience to international and domestic visitors. For motorists, it reduces skid resistance on the road surface and produces spray effects to motorists resulting in a loss of visibility and it causes a distraction.

Whilst the proposed amendments are unlikely to completely solve the entirety of the livestock effluent problem, it is important in going some way to encourage those engaged in this activity to take measures to reduce effluent spillage. These changes represent a good step in the right direction and will signal that there is decreasing tolerance for this kind of activity.

The AA acknowledges the large and important contribution to the New Zealand economy by the farming and transport sectors to produce and move goods around the country and abroad. However, we cannot see any good reason, for example, for trucks to have the ability to discharge effluent through their trucks' stopper tubes onto the road and roadside. And we

do not agree with the claim made by some in the industry that any change will result in high costs. Only a small minority of trucks (10 percent) do not have containment devices. It is important that all trucks transporting livestock are adequately equipped to perform business operations with minimal impacts to motorists, communities, and the natural environment.

Once again, thank you for the opportunity to make a submission on the proposed changes to NZ Standard 5413:1993. We look forward to seeing more positive developments in the sector, such as the ones proposed by the Ministry, and for the minimisation of livestock effluent on the national roading network.

Yours sincerely

**Mike Noon**  
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