



## PROPOSAL FEEDBACK

---

To: Waka Kotahi NZ Transport Agency (Waka Kotahi)

Submission: Tyre Standards – In-service inspection

Date: 24 February 2023

Sent to: [brent.downes@nzta.govt.nz](mailto:brent.downes@nzta.govt.nz) (Operations Advisor)

Contact: Dom Kalasih, General Manager Industry  
La Ara Aotearoa Transporting New Zealand Incorporated  
[dom@transporting.nz](mailto:dom@transporting.nz) 027 441 4309

Nick Leggett – CEO  
La Ara Aotearoa Transporting New Zealand Incorporated  
[nick@transporting.nz](mailto:nick@transporting.nz) 04 472 3877

## **Ia Ara Aotearoa Transporting New Zealand submission to Waka Kotahi: In-service inspection of tyre standards**

### **Introduction**

- 1 Ia Ara Aotearoa Transporting New Zealand Incorporated (Transporting New Zealand) welcomes the opportunity to provide feedback on Waka Kotahi's proposal that the confirmation of tyre standards is introduced to in-service inspection from 1 April 2024.
- 2 Compliance with tyre standards requirements is currently undertaken during entry certification. Other than checks for tread depth, tread consistency across an axle and a structural integrity check, the current in-service inspection procedure does not include confirmation that the tyre meets one of the approved tyre standards as required under the Land Transport Tyres and Wheels Rule 2001.
- 3 Waka Kotahi proposes that if tyre standards are not observed to be compliant with an approved standard during the in-service inspection then that will be a reason for rejection, in other words, heavy vehicles will fail their Certificate of Fitness.
- 4 Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) provides leadership, advisory and advocacy to the transport industry and believes we all need to operate in an environment where the following must be managed and co-exist:
  - The safety and wellbeing of our drivers and other road users, our drivers are our most valuable asset
  - The impacts of transport on our environment
  - The transport of goods by road is economically feasible and viable and it contributes the best way it can to benefit our economy.
- 5 The predominant lens and scope of our submission is the impacts and risks associated with commercial (road freight) traffic and the economy that traffic serves. Therefore our comments are focussed on Waka Kotahi's proposal applying at heavy vehicle in-service inspection, i.e. Certificate of Fitness.

### **Waka Kotahi rationale for change**

*Waka Kotahi claim that "Industry has noticed a strong uptake in the number of non-compliant and less safe tyres being fitted to vehicles."*

- 6 Transporting New Zealand request that Waka Kotahi provide quantitative data to support its claim that there has been strong uptake of non-compliant tyres. For example, please advise the numbers of non-compliant tyres identified compared to the number of compliant tyres for each of the calendar years over the last decade.

*Waka Kotahi claim that "Data from crash analysis shows that tyres are a large contributor to deaths and serious injuries (DSI) on the road"*

- 7 Transporting New Zealand understands that Waka Kotahi's analysis of DSI crashes over the ten year period 2012 to 2021 indicates that heavy vehicles contributed to 176 of the 2,538 DSI crashes, and that tyres were a factor in 24 of those 176 crashes. Despite it being extremely unlikely that all those 24 cases involved non-compliant tyres, taking the worse scenario, then non-compliant tyres would at very most be a factor in less than 1 percent of the DSI crashes over the 10 year period. Based on our analysis, Transporting

New Zealand do not agree with Waka Kotahi's claim that tyres are a large contributor to DSI and urge Waka Kotahi to provide evidence to show otherwise.

*Waka Kotahi claim that "...tyres that are not standards compliant are more likely to suffer from blow outs as the structure of these tyres is not controlled by a standard. Non-standards approved tyres are often lower quality and due to this may also wear faster and contribute to DSI's due to worn tread."*

- 8 Transporting New Zealand request that Waka Kotahi provide quantitative evidence to support its above claim. Over the last 2 years particularly, anecdotally we understand the number of tyre blow-out incidents have increased however, our understanding is that those events are due to the increasingly poor quality of the roading network and the increasing number of severe potholes rather than a tyre standards issue. Notwithstanding, we welcome Waka Kotahi to show otherwise.
- 9 Transporting New Zealand also believe that Waka Kotahi has not considered that typically, heavy vehicles have many more tyres and axles compared to light vehicles and therefore, there is inherently much more redundancy in terms of managing tyre blow-out risk. For example, loss of control due to a front tyre blow-out event is much less likely to occur on a twin steer truck than on car, and similarly a drive axle tyre blow-out on a truck or on a heavy trailer axle is much less likely to lead to loss of control because other tyres and axles are available on heavy vehicles to temporarily share the consequential load transfer.

### **Consultation questions from Waka Kotahi**

#### *General feedback on the changes and implementing the changes*

- 10 Transporting New Zealand understands that if Waka Kotahi were to proceed with this change, then putting aside exceptional cases, in essence tyres and retreads on heavy vehicles would be inspected at Certificate of Fitness for compliance with one of the following standards referred in the relevant part of section 2.7 of Land Transport Rule: Tyres and Wheels 2001 Rule 32013, and excerpt of which is copied below.

#### *Standards for new tyres*

*2.7(4) The approved vehicle standards for new tyres are:*

- (a) UN/ECE Regulation No. 30, Uniform provisions concerning the approval of pneumatic tyres for motor vehicles and their trailers (E/ECE324-E/ECE/TRANS/505/Rev. 1/Add.29);*
- (b) UN/ECE Regulation No. 54, Uniform provisions concerning the approval of pneumatic tyres for commercial vehicles and their trailers (E/ECE324-E/ECE/TRANS/505/Rev. 1/Add.53);*
- (c) UN/ECE Regulation No. 75, Uniform provisions concerning the approval of pneumatic tyres for motor cycles and mopeds (E/ECE324-E/ECE/TRANS/505/Rev. 1/Add.74);*
- (d) Council Directive 92/23/EEC of 31 March 1992 relating to tyres for motor vehicles and their trailers and to their fitting;*
- (e) Federal Motor Vehicle Safety Standard No. 109, New Pneumatic Tires -- Passenger Cars;*
- (f) Federal Motor Vehicle Safety Standard No. 119, New Pneumatic Tires for Vehicles Other Than Passenger Cars;*
- (g) The Standards of the Japan Automobile Tire Manufacturers' Association, Inc.;*
- (h) Japanese Industrial Standard D 4203, Tires for motorcycles and scooters;*

- (i) Japanese Industrial Standard D 4230, Tires for Automobiles;*
- (j) Australian Design Rule 23, Passenger Car Tyres;*
- (k) Australian/New Zealand Standard AS/NZS 2230, New pneumatic tyres for light trucks and trucks/buses;*
- (l) New Zealand Standard 5453, Specification for New Tyres for Passenger Vehicles.*

*Standards for retreads*

*2.7(5) The approved vehicle standards for retreads are:*

- (a) UN/ECE Regulation No. 108, Uniform provisions concerning the approval for the production of retreaded pneumatic tyres for motor vehicles and their trailers (E/ECE324-E/ECE/TRANS/505/Rev.2/Add.107);*
- (b) UN/ECE Regulation No. 109, Uniform provisions concerning the approval for the production of retreaded pneumatic tyres for commercial vehicles and their trailers (E/ECE324-E/ECE/TRANS/505/Rev.2/Add.108);*
- (c) Federal Motor Vehicle Safety Standard No. 117, Retreaded Pneumatic Tires;*
- (d) British Standard AU 144, Specification for retreaded car and commercial vehicle tyres;*
- (e) Australian Standard 1973, Pneumatic tyres -- Passenger car, light truck, and truck/bus -- Retreading and repair processes;*
- (f) New Zealand Standard 5423, Specification for Repairing and Retreading Car, Truck and Bus Tyres.*

- 11 Transporting New Zealand foresee considerable operational issues with inspectors identifying that each tyre is standards compliant. Firstly, in identifying the tyre marking that indicates that each tyre meets the relevant standard and secondly, the time taken for that assessment to occur. For example, two of the common vehicles in our fleet include twin steer trucks and 5 axle dog trailers, presuming there are twin tyred axles on the truck's drive set and the trailer, that involves identifying the relevant tyre markings on 12 and 20 tyres of those vehicles respectively. Waka Kotahi does not appear to have considered the additional time and cost associated with its proposal and Transporting New Zealand requests that Waka Kotahi provide that information prior to any further substantive progress on this proposal.
- 12 Further to point 11 above, our industry is already suffering considerable inconvenience associated with the availability of Certificate of Inspection services. It is not unusual for operators to be advised that inspections cannot be undertaken without a three week lead-time and our operators are regularly subjected to frustrating queuing delays at inspection sites, with the vehicle frequently needing to be placed out of service for a whole day. That associated downtime of the vehicle is a loss of productivity that we can ill afford. It appears to Transporting New Zealand that if this proposal proceeds then these current issues will be exacerbated.

*Our thoughts on "Communication to industry and public of intended change beginning 1 April 2023. Advised of future non-compliance at inspections, with a view to getting compliance at that time"*

- 13 Transporting New Zealand does not support Waka Kotahi communicating to industry and public about the intended change.

*Our thoughts on “Introduce and enforce date of 1 April 2024.”*

- 14 Transporting New Zealand does not support Waka Kotahi introducing the requirement that tyres on heavy vehicles be inspected for standards compliance at in-service inspection from 1 April 2024.

### *Summary*

- 15 Transporting New Zealand does not believe Waka Kotahi has made a case to demonstrate that its proposal is well considered. In fact, Transporting New Zealand is concerned that there will be significant perverse outcomes if this proposal proceeds without proper consideration.
- 16 Transporting New Zealand believes Waka Kotahi are obliged to demonstrate with a reasonable degree of rigour that its proposal has merit and we invite Waka Kotahi to seek our assistance in meeting that obligation.
- 17 Compliance that tyres meet approved standards is currently undertaken at entry certification. Waka Kotahi has not demonstrated that there is a justifiable case that additional compliance checking is necessary however, in the event that it did, then Transporting New Zealand recommends that standards compliance be primarily controlled at border entry which is how the majority of truck and heavy trailer tyres enter our country. It is our recommendation that standards compliance checking of the domestic supply of truck and heavy trailer tyres, be that manufactured and/or re-treaded in New Zealand, should also be undertaken at market entry level. Doing otherwise faces the inherent predicament aptly described by the time honoured proverb “trying to close the gate after the horse has bolted”.

### **About Ia Ara Aotearoa Transporting New Zealand**

Ia Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry. Our members operate urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand’s purpose is creating the environment where trucking operators can drive successful, safe, sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy
- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

New Zealand’s road freight transport industry employs 33,000 people (1.2% of the total workforce), and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people and contributes 4.8 percent of New Zealand’s GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

**END**