



24 February 2016

Ministry of Transport
VDAM Rule Review
Submissions
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Submission on “Review of the Vehicle Dimensions & Mass (VDAM) Rule”

Background

1. The New Zealand Forest Owners Association (FOA) welcomes the opportunity to provide a submission on the “Review of the Vehicle Dimensions & Mass Rule”. However, we are concerned about the relatively short consultation period allowed for such an important piece of work.
2. FOA would like the opportunity to present our submission in person to the review committee.

FOA

3. The FOA is the representative membership body for the commercial plantation forest growing industry.
4. FOA members are responsible for the management of approximately 1.2 million hectares of New Zealand’s plantation forests and over 80% of the annual harvest.
5. The New Zealand harvest is currently approximately 30 million tonnes per annum, with resource available to increase to over 35 million tonnes over the next five years.
6. FOA is submitting on behalf of its national membership.

Background

7. The intent in the Ministers foreword is welcomed in that it is heavily focused on the balance of safety and efficiency. Improved productivity, less trucks to reduce exposure for a signalled 75% increase in freight task.
8. This desire to see increased productivity from the existing fleet and a smooth transition to a newer safer fleet should not be derailed by spurious data that misrepresents a picture of current performance and compliance being a reasoned indication of what future performance and compliance might be which in turn might constrain efforts to deliver on the Ministers opportunities.
9. With the VDAM rules as they currently are, some of our members have actually reported a productivity loss. Although gross weights have increased through HPMV permitting, payloads have remained relatively static as a result of tare weights increasing, resulting in the same number of trucks on the road but just heavier.
10. Also we have observed stricter compliance to gross weight limits on the general access vehicles (at 44 tonne) due to reduced tolerances and RUC enforcement. Historically, general access vehicles aimed for 44 tonne plus the 1.5 weighing tolerance, now they are aiming for closer to 44 tonne to comply with RUC regulations. As a result most of the high mass vehicles working on general access are now less productive than they were under previous regulations.
11. The HPMV strict liability of weight enforcement already has elevated fines, increased burden of proof responsibilities, with implications for HPMV permits that in turn dictates a weight compliance performance significantly different from the past.
12. Also the recently announced reduction in offload amount from 4 tonne to 2 tonne with associated delays and costs will have serious ramifications for stricter compliance than has historically been seen.
13. The "precision" of weighing systems versus "an averages accuracy" needs to be very clearly understood. With low weight tolerances and very tight demands for specific weight precision on each and every load by axles & groups means there are significant demands of weighing technologies that cannot easily be met without making "substantial conservative allowances" on each and every trip to ensure compliance. This is particularly the case for the forest industry where trucks are not weighed on certified weighbridges until destination and trucks have to rely on on-board or in-forest vehicle mounted weigh systems used in challenging conditions that may



compromise accuracy.

14. Again the paradigm of the past weighbridges experiences with the loads that are weighed and with a larger tolerance is not a good indication of what is the future paradigm of more intensive enforcement with lower tolerance with more substantive consequence, is going to be.
15. Current permits require engagement with multiple councils that in turn delays and increases the costs for the issue of a workable permit. Regarding the current need to renew permits, the revocation of a permit once issued:
 - a. All of this goes away if some of the VDAM Rule changes are actually made
 - b. That is: if nothing under 50 tonne requires a permit then the workload for the permit agency, Operators and enforcement becomes substantially less and will only be focused at true HPMV or overweight
 - c. No end date to permits, Permit Auto Renewal, Bulk fleet pro forma permits. Unless significant changes are made means simple renewals are then not holding up true new applications or new gear or routes.
16. The interrelationship with weight and RUC needs to be challenged and clarified. The industry must acknowledge the necessity to pay for the weight that it in turn carts. Changes to the VDAM weight limits should be reflected in RUC weight bands that the operators can pay and utilize, whether it be in General Mass weight limits and RUC classes or in true actual HPMV operations.
17. The Performance Based Standards (PBS) Review work should have been allowed for in the detail of this VDAM review changes so the industry can sign off logically the detail of PBS into the Rule. The significance of what may or not be possible through PBS will again change the paradigm of what is needed or not in Rule or Regulation.
18. The operational suitability of a range of truck configurations must be traded off against perceptions of increased productivity with new 50 max and multi axle units going on the road. What needs to be understood is that with the extra length and axles, is increased tare weight combined with extra capital cost that means that any true productivity gain of the new units is marginal at best.
19. There are specific sectors that require a 7 axle combination for the ability of these units to perform in the sectors / conditions they operate. For example



the forestry, rural farming, rural aggregate & fertiliser, and construction sectors, require an ability to access, and manoeuvre in areas that maybe constrained, have poor traction and/or steep conditions, all of which dictates the 7 axle configuration as essential.

20. As examples, a 4 axle truck towing a 3 axle trailer has most of the weight on the truck with less weight on a trailer – down low and safe – and able to tow out of difficult conditions. A 3 axle truck towing 3 and 4 axle trailers are the mainstay to rural delivery, tipping & construction where weight over the drive axles is paramount to access & manoeuvring in marginal road conditions on and off road.
21. Notably the 9 axle or other multi axle combinations are, in a lot of circumstances completely unsuited to most of this task, regardless of the weight they are able to operate at – 44, 45, 48, 50 or more.
22. Even the new build of 7 and 8 axle combinations with new emission technologies and lengthened trailers, to attain long low and safe configurations have added tare weight, that has in turn decreased the productivity of these configurations compared to what was attainable in the past.
23. Combined with the fact that the weight of product is variable, or unable to be determined with any degree of precision until the point of destination, it makes precision of weight highly variable. Accordingly significant tolerance and conservatism is and will be required to ensure strict axle & gross weight compliance. On truck and in-field weighing systems are not yet accurate enough in all conditions encountered in forestry operations, such as sloping skids.
24. A serious omission from the consultation document, is a discussion about overall length. In the forestry sector, customers demand logs in many lengths, but in particular the ability to cart logs of 6.1m (nominal) length is critical to the industry. To do this safely we need to be able to cart 2 bays of up to 6.2 logs on a trailer (longer, lower, safer) and to do this, an overall length of a vehicle combination needs to be at least 23.8m.

Therefore and on the basis of the above context comments and with the feedback from FOA members and other industry representative groups, we make the following responses to the proposals outlined in the consultation document.



Axle Mass and Gross Mass

Proposal 1	Maintain current axle Mass & gross mass limits	No
Proposal 2	Revise Current Schedule 2 limits	Yes
Proposal 3	Increase 7 axle limit to 44 tonne	No, too low
	Increase 8 axle limit to 45 tonne	No, too low
Proposal 4	Remove permitting requirements for 50 max	Yes
Proposal 5	Increase axle mass limits for specific vehicles	Yes – available to all sector
Proposal 6	Amend tyre size categories for axle mass	Yes
Proposal 7	Reduce weighing tolerance from 1500 to 500kg	Yes - if General Mass limits are lifted to 7 axle @ 45t, 8 axle @ 47t No - if General Mass limits are not lifted beyond 7 axle @ 44t and 8 @ 45t

Width		
Option 1	Status Quo	No
Option 2	Increase width to 2.55m	No
Option 3	Increase width to 2.55 plus 50mm	Preferred
Option 4	Increase width to 2.60 plus 50mm	Yes



Height		
Option 1	Status Quo	No
Option2	4.275	No
Option 3	4.30	Preferred

Sector Specific Dispensations		
Option 1	Status Quo for all car transporters	No - they have argued a case for safety and productivity
Option2	Increase car transporters mass to 38,000kg	Yes – With similar logic for other sector specific dispensation



Permitting

5. Divisible loads

- Should RCA be allowed to grant overweight permits for divisible loads

Yes – with the proviso that they cannot restrict / impose weight limits less than General Mass limits

6. Indivisible loads

- List of equipment / items be defined in Rule – as indivisible load

List needs to be in Regulation so not awaiting Rule draft changes to add or delete specific item?

7. Crane Boom sections:

Option 1	Crane boom sections – status quo	-	No
Option 2	Provide exceptions for Crane boom sections	-	Yes

8. HPMV Bulk Fleet Permits

- Yes - "Support" bulk permit options

9. Management of OD loads

Proposal 1.

Proposal 2. Flags "should be" permitted to signal edge of loads

Proposal 3. All tractors "should be" required to use lights & panels

Proposal 4. Pilots "should be" able to use sound warnings

Proposal 5. Pilots "should be" allowed to be positioned on road in line with load extremity

Yours sincerely

Glen Mackie
 Technical Manager

