



MOTOR TRADE ASSOCIATION

Submission to

Ministry of Transport

On

Safer Journeys

Discussion Document

Motor Trade Association Inc
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Date

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2 October 2009

Safer Journeys
Ministry of Transport
P O Box 3175
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Dear Sir/Madam

Submission: Safer Journeys Discussion Document August 2009

This submission is from:

Motor Trade Association
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Thank you for the opportunity for MTA to provide comment on the *Safer Journeys* discussion document regarding the views of and its effect on the automotive industry.

Yours sincerely

A handwritten signature in black ink, appearing to be 'LJahnke', with a horizontal line extending to the right.

Liezel Jahnke for

Dougal Morrison
Advocacy and Training Manager

Ministry of Transport (MoT) Safer Journeys Discussion Document August 2009

Executive summary

Introduction

The Motor Trade Association (Inc) (MTA), which represents approximately 4,100 businesses within the automotive industry and allied services, take this opportunity to convey our views on New Zealand's road safety priorities and its effect across a wide range of our membership.

Members of our association operate businesses ranging from heavy and light general automotive repairers, vehicle importers and distributors, vehicle sales, vehicle entry and in-service inspection services, transport services including rental cars, vehicle recovery, vehicle ferrying services, agricultural equipment and service stations. In turn, our members employ in excess of 45,000 staff who are road and vehicle users in both their occupational and private lives.

Scope of submission

MTA commends MoT on this comprehensive discussion document on road safety in New Zealand. While fully supportive of initiatives to improve road safety through reducing alcohol and drug impaired driving, driver licensing, roads and driving speeds and acknowledging the importance of these areas from a road safety perspective, this submission has not focused on topics that fall outside our primary areas of interest.

We have mainly focused our comments on aspects of the discussion document affecting vehicles, MTA members and our association's core business. The submission broadly discusses MTA's position of support or opposition with respect to the relevant initiatives, without drilling down into great depth or detail on how initiatives could be implemented, although some examples or suggestions are provided. MTA anticipates that there will be future opportunities to provide further stakeholder input to any initiatives from the discussion document that MoT proceed with.

This submission has used the frame of reference set out in the discussion document to structure the position of MTA on the relevant topics and in each subject area, i.e. 'Improving the safety of young drivers', the submission discusses initiatives in order of priority for MTA. In addition, MTA have commented on a number of suggested areas or initiatives which we believe merit consideration and would be complementary to the initiatives in the discussion document.

MTA member engagement

MTA have promoted the Safer Journeys consultation to members through our monthly New Zealand Radiator magazine, the MTA website and various electronic communications. Our purpose was to prompt members to both provide comment to MTA for this submission and to promote the importance of individuals completing the questionnaires available on the MoT website to provide further feedback on wider priorities.

From the MTA's perspective an online survey sent to all members was a central tool in gauging MTA member opinion on key issues. This survey covered what we believe to be the most important topics affecting our members as vehicle dealers, repairers, fuel retailers and related trades. The questions were couched in terms requiring a simple yes or no answer and whilst simplistic, members' overall views on each issue became clear. Members also had an opportunity to provide general comments, the majority of which form part of our discussion of specific topics later in this submission. We received 238 replies to this member survey.

The discussion document was also considered by the MTA dealer, repairer and motorcycle sales sectors.

General comments

MTA is dedicated to better motoring and as part of this vision recognises the importance of road safety in ensuring the wellbeing of all New Zealanders. Our national road safety record is not nearly as good as it should be and road tolls have risen 14% over the past year. *Safer Journeys* provides an opportunity to bring about a clear national focus on road safety that is both enduring and effective. It provides an important catalyst for setting robust yet realistic priorities and achieving better coordination of road safety efforts.

MTA and its members have a strong interest in this area as we sell, service and inspect vehicles; assist in their refuelling, impounding, towage and storage and are exposed to risks as drivers and road users. As an organisation we understand the vehicles at the centre of all road safety initiatives better than most people and can make a valuable contribution in ensuring those vehicles are of sound quality; serviced and operated correctly. Some of the choices we need to make are related to driving behaviour and use of vehicles, while other relate to influencing consumer choice or compliance of vehicles. MTA believes a robust, holistic approach across these areas is required to ensure an overall improvement in road safety.

We strongly support the high priority MoT have assigned to the safety of young drivers and consider the fact that New Zealand's 15-17 year olds have the highest road death rate in the OECD demands serious and urgent action. MTA has a proud record of involvement in road safety initiatives such as through the Greg Murphy 'Eliminate the Risks' schools campaign, of which the most recent educational events took place in August 2009.

The ageing New Zealand vehicle fleet presents an inherent risk to road safety that should be reduced where possible. Since the year 2000, new technology in vehicles is contributing 4% per year to the safety of our light vehicle fleet. Unfortunately this growth rate is too slow and a range of initiatives can be implemented to accelerate the renewal and improved safety of the fleet. While the focus of *Safer Journeys* is on safety, MTA considers the associated fuel cost savings and environmental benefits of reducing the age of the fleet would be highly advantageous as well. Other OECD countries have recognised these benefits and have already made direct interventions to encourage the purchase of newer vehicles.

Summary table of initiatives

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1. Introduce mandatory alcohol interlocks for recidivist drunk drivers	Support
Increasing the safety of young drivers	
2. Impound vehicles of drivers who breach graduated driver licence conditions	Support
3. Introduce driving restrictions for young drivers based on vehicle power and level of modification	Support
4. Introduce compulsory third party insurance	Support

Increasing the safety of motorcycling	
5. Introduce rider competency-based training assessment	Support
6. Moped riders be required to hold a moped/motorcycle licence	Support
7. Introduce three-year validity period for learner licences	Support
8. Treatment programme to address motorcycle blackspots	Support
9. Promote high visibility clothing	Support
10. Introduce star rating system for protective clothing	Support
11. Replace current 250cc limitation for learner drivers with power to weight ratings	Support
12. Introduce a Warrant of Fitness (WoF) test requirement for mopeds	Support
13. Mandate all new motorcycles over 600cc have anti-lock brake systems by 2015	Oppose
14. Introduce a differential ACC levy for motorcycles with those over 600cc paying a higher ACC levy than smaller bikes	Oppose
Safer roads and road sides	
15. Introduce more wire rope median barriers	Support
AREAS OF MEDIUM CONCERN	
Improving the safety of the light vehicle fleet	
16. Increase police enforcement of WoF, Road User Charges (RUC) and Vehicle Licences*	Support
17. Introduce an eight-year rolling ban for used vehicle imports	Support
18. Include vehicle safety features on vehicle sales Consumer Information Notices (CIN)	Support
19. Combine the CIN card and Fuel Use data onto one consumer information sheet*	Support
20. Improve the safety of the light vehicle fleet through the introduction of a scrappage scheme	Support
21. Revise WoF Standards to ensure advanced vehicle safety systems are properly maintained and working effectively	Support
22. Mandate electronic stability control (ESC) for all light vehicles, new and used, entering the fleet	Oppose
23. Change the frequency of WoF for newer vehicles	Oppose
24. Change the frequency of WoF for older vehicles	Oppose
Improving the safety of heavy vehicles	
25. Publish heavy vehicle operator safety ratings	Support

*Initiatives raised by MTA additional to those in the *Safer Journeys* discussion document.

Discussion

AREAS OF HIGH CONCERN

Reducing the impact of alcohol/drug impaired driving

1. *Introduce mandatory alcohol interlocks for recidivist drunk drivers*

MTA supports the introduction of alcohol interlocks for recidivist drunk drivers to use for a pre-determined period after their licence is restored. There is some value in interlocks being used as a deterrent and preventative mechanism in this manner. This would, however, be expensive given the administrative requirements to manage the recidivist driver licence conditions and the lease, fitment, servicing and eventual removal of interlock equipment from vehicles, be this through drivers meeting behavioural requirements or vehicle sale. This cost would be beyond those on lower incomes so would need to be subsidised if it is to operate universally.

Increasing the safety of young drivers

2. *Impound vehicles of drivers who breach graduated driver licence conditions*

MTA supports impounding vehicles of drivers who repeatedly breach graduated driver licence (GDL) conditions. Members have also suggested that drivers who repeatedly breach conditions reach a point where they are automatically required to start the GDL process again. This would act as a further deterrent to recidivist behaviour. It is important to instil good driving habits and responsible behaviour in all drivers during these early stages of their driving experience.

There may be some practical issues around certain impacts that need to be considered carefully, such as for vehicle dealers providing financing for vehicles that are impounded.

3. *Introduce driving restrictions for young drivers based on vehicle power and level of modification*

MTA strongly supports the introduction of driving restriction for young drivers based on vehicle power and level of modification. Introducing this would not be without difficulties, such as where youths are using cars owned by family and friends. To work this initiative would need to be kept very simple with certain types of vehicles specified such as V8's, those with a supercharger, turbocharger or those modified to increase performance, and high performance vehicles based on manufacturer acceleration figures. It is noted that this type of restriction has been introduced in Australia, where licenced drivers cannot own or drive a super or turbo charged vehicle until they are aged 20, and a power limit is already in place for motorcycles in New Zealand.

4. *Introduce compulsory third party insurance*

MTA supports the introduction of third party insurance on the condition this is effectively enforced. We are well aware that the three current conditions of vehicle use, namely WoF, vehicle licence and RUC are not adhered to by a significant number of vehicle owners; and would not want to see third party insurance become a fourth factor on this list that is seen as meaningless by some due to lack of enforcement. Previously we have not supported third party insurance for reasons it could cause vehicle insurance costs to rise for all vehicle users and if it were not enforced, there would be no benefit.

Increasing the safety of motorcycling

5. *Introduce rider competency-based training assessment*

Riding a motorcycle is a much more complex task than driving a car. This aspect has been well reported in many studies into rider behaviour. Training is seen as the principal means of ensuring riders are informed of and understand the risks, and know to wear the right apparel. Linking or incentivising rider training with motorcycle licensing will encourage or mandate people to get training as many do not think they need it, or think they already know what to do, which in most cases are an inflated personal opinion.

6. *Moped riders be required to hold a moped/motorcycle licence*

MTA supports a moped-specific skills or competency test resulting in riders gaining a moped permit, as opposed to being required to gain a full motorcycle licence. A person holding a Class 1 drivers licence and who wants to buy a moped does not currently have to pass any competency test. MTA considers this is an aberration, which needs to be addressed. Many people are looking at mopeds and scooters as a low cost commuter transport alternative, but underestimate the different skills required to ride such a vehicle within normal urban traffic conditions. The dynamics involved in riding a two-wheeled machine are very different to those required to drive a car. A car driver will of course be familiar with road rules and traffic behaviour, however riding on the same roads on a moped requires significant additional knowledge and skill sets. Where to ride within traffic lanes, awareness of dangers, manhole covers and road markings, being visible to other road users, and wearing appropriate safety gear are all highly relevant in keeping safe and minimising accidents. These aspects are addressed within the existing Motorcycle Basic Handling Skills test and compulsory completion of this test should be a prerequisite for any person holding a Class 1 driver licence seeking to ride a moped.

For many people mopeds are an entry point to either the world of motorcycling or as a means of transportation for young drivers before they progress to cars. Some European countries recognise this and have lower age requirements for moped and small scooter users. That approach is believed to provide a very effective training stage for young drivers, before they advance to driving other vehicles. Studies show that people who progress through a moped stage will learn better driving and road-craft skills. This is based on the premise that the consequences of an accident can be more severe than those facing a car driver, so a moped rider must develop better skills at the outset. Being able to read road conditions and the intent of other drivers mean they learn a more defensive driving style. This is a key benefit of moped riding that should be promoted and MTA recommends that if the standard age for driving is increased, the minimum age requirement for mopeds should remain at the current level (15 years).

7. *Introduce three-year validity period for learner licences*

MTA supports the proposed initiative aimed at reducing the incidence of motorcyclists staying on learner licences for extended periods beyond what is reasonable for them to progress to a full licence. Currently there is no imperative to gain a full licence.

A person new to mopeds or motorcycles and who does not hold a licence for any vehicle category is currently required to attain a learner licence and pass a Motorcycle Basic Handling Skills test. MTA considers this process is adequate, but if learner licences are to have a maximum validity period (i.e. three years) introduced, mopeds may be unreasonably impacted. Mopeds are often seen as a half-way step between a bicycle and a motorcycle or car and it is within this context that the introduction of a moped permit has some merit. This could require following the existing learner licence test (confirming knowledge of road rules) and completing the Motorcycle Basic Handling Course to be awarded a moped permit. This distinction will remove a maximum validity limit for a learner licence applying to mopeds.

8. *Treatment programme to address motorcycle blackspots*

MTA supports the identification of significant road hazards to reduce future accidents. Resultant remedies can take several forms, from repairing the defined hazard, to the erection of warning signs where larger scale or longer term problems need to be confronted. Annual statistical reports tend to generalise and it is often very difficult to determine the unique characteristics associated with motorcycle crashes. This in turn makes it difficult to introduce remedial strategies aimed at preventing or reducing similar crashes in the future. Roadside structures such as barrier fences, signs, inspection covers and culverts need to be recognised and remedied where they have attributed to motorcycle accidents. Hazard identification also serves as a means by which traffic safety authorities can engage with individual riders, rider clubs, and organisations on a local level. This type of approach has been trialled in various regions around the country, including the Manawatu/Wanganui area.

9. *Promote high visibility clothing*

We are increasingly starting to see the more common use of high visibility clothing by motorcyclists. Many motorcyclists are beginning to recognise the relevance of doing all they can as individuals to ensure they are seen by other motorists. As this trend increases other riders will join the 'fashion' and will also be more likely to use high visibility clothing lines. MTA supports promotion that helps build such awareness and education further.

10. *Introduce star rating system for protective clothing*

This is a highly relevant idea as motorcyclists currently face a wide range of options when choosing protective clothing. Other than compliance with various safety standards and/or price there is little to differentiate good versus not so good. Helmets are a very good example where it is possible to buy one ranging in price from \$100 to \$800 or more. Other than the salesman's recommendation there is currently little data available which helps a consumer consider the relative merits of the options available. A star rating system would be an interesting and useful addition to support consumer choice, although it would be difficult to introduce and enforce.

11. *Replace current 250cc limitation for learner drivers with power to weight rating*

MTA has already indicated its support for this change in past consultations. The current restriction of 250cc for motorcyclists in their learner and restricted phase is outdated and international best practice recognised this many years ago. Most high performance machines of 250cc or less are capable of 200 kph (or more) and are thus known amongst riders as "pocket rockets". In recognition of this many OECD countries have adopted a power to weight ratio reflecting a more appropriate restriction for inexperienced riders. Learner drivers are then only be able to ride a predetermined list of suitable motorcycles that aligns with their inexperience.

12. *Introduce a WoF test requirement for mopeds*

MTA fully supports the proposal to introduce a WoF for mopeds. Mopeds are travelling on the roads, mixing with all other motorised traffic. Currently mopeds are the only motorised form of road traffic that is not required to pass through a periodic road worthiness inspection. That exemption is very clearly a modern disparity which needs to be remedied. They have tyres, brakes, lights, and indicators etc. all of which require periodic inspection to ensure they are still operating in an effective manner.

Modern mopeds are a very different machine to those that existed many years ago. It needs to be recognised that most mopeds are no longer a bicycle with an engine, or a very low powered scooter with pedals. These vehicles travel at normal road speeds within city environments and are fully capable of being ridden within the normal traffic flow, not to one side like a bicycle. This needs to be recognised with the inclusion of mopeds in existing road worthiness inspection processes.

13. *Mandate all new motorcycles over 600cc have anti-lock brake systems by 2015*

MTA does not support this proposed initiative. New Zealanders are technology takers in that we draw from what is available on the world market. As new features and technologies make their way into the market New Zealand buyers will pick up the technologies. It does not require Government regulation to achieve that result. Notwithstanding this position, many in the industry expect to see ABS available, either as standard or optional, in most larger road motorcycles around 2015.

Government, safety organisations, and the industry itself can promote uptake of new technologies through advertising and other initiatives. This will help build consumer interest and demand, which in turn helps stimulate importer action to bring in motorcycles with such features. This strategy has and is being employed to good effect in the case of ESC fitment in cars.

It should also be recognized that use of ABS on motorcycles is a more complex issue than it is on cars. Specific training is required for motorcyclists to gain a good understanding of the feature. Front wheel lock-up has disastrous effects on a motorcycle, and given the natural aversion to the risk of that occurring, riders need to be trained to use the feature. Such training is not required in the case of ABS in a car.

14. *Introduce a differential ACC levy for motorcycles with those over 600cc paying a higher ACC levy than smaller bikes*

MTA does not support this proposed initiative. There are many experienced riders of larger motorcycles who have not been involved in serious accidents. To segregate them purely on the basis of the size of motorcycle they ride is an inaccurate and poorly designed strategy. If certain groups are to be isolated and targeted for higher fees it would make more sense that the individual records of drivers/riders be the basis of such direction. But that will demand a much more sophisticated tracking mechanism.

This initiative to differentiate levies would contradict the ACC principle of universal cover, and if one starts to differentiate for motorcycles it would be unfair not to do it on other grounds as well, such as for larger, powerful cars; particular at-risk driver groups such as youth and older drivers and so on.

Safer roads and road sides

15. *Introduction of more wire rope median barriers*

MTA support the introduction of more wire rope median barriers as the most cost-effective way to keep opposing traffic separated and reducing head-on crashes. While the motorcycle sector has expressed concern over the use of wire rope barriers the benefit of these measures is to the greater good of all road users and needs to prevail. There are dangers posed to motorcyclists by all types of median barriers, as there are dangers on roads where no barriers exist. The high cost of concrete barriers as an alternative mean less are built and wire rope barriers are seen as a more cost-effective solution to make greater safety gains.

AREAS OF MEDIUM CONCERN

Improving the safety of the light vehicle fleet

16. *Increase police enforcement of WoF, RUC and Vehicle Licences*

Note that this item is not included in the original MoT safety proposals but is one MTA considers to be a high priority. MTA proposes that there should be more active enforcement of existing road safety rules and regulations at all levels.

Robust enforcement of all existing vehicle and driver requirements is necessary otherwise they are ineffective. In the main people abide by requirements, however, there is a significant minority that persistently do not get a WoF, renew and pay their vehicle licence or pay RUC. Not only does this result in motorists not paying their share and driving a vehicle which is a potential hazard to themselves and others, but also allows bad attitudes to develop, promoted by 'getting away' with requirements at this level which can flow on to other areas of road safety and life in general.

MTA considers there is little value introducing various new rules and regulations if existing requirements are not being enforced to be effective in the first place.

17. *Introduction of an eight-year rolling ban for used vehicle imports*

MTA fully supports the introduction of an eight year rolling ban on used import vehicles. This was our preferred position during the initial consultation phase when exhaust emission standards were first considered for application on the used import trade. The standards-based approach adopted imposes significant periods of market disruption on the used import industry as they take effect. For example in 2012, when the next level of exhaust emissions standards come into effect used import volumes are likely to halve overnight. This causes capacity problems in all areas of the industry including; bio-security inspection services, shipping capacity, vehicle certification services, and lastly vehicle retailing. No industry can operate under such arbitrary and periodic change points.

A rolling age ban avoids such dramatic impacts on the industry, yet still ensures vehicles imported are of a progressively better technological standard overall. It is self-renewing, negating the need for vehicle standards to be continually or periodically revisited as a means of controlling industry activity. A rolling age ban is a defined, consistent and easy to understand approach, allowing all industry participants to better plan their business activities. MTA considers an eight-year rolling ban will contribute significantly to reducing the average age of the New Zealand fleet.

18. *Include vehicle safety features on vehicle sales Consumer Information Notices (CIN)*

MTA supports the inclusion of a vehicle's safety star rating on the CIN, such as through the NCAP or ANCAP systems. We do not believe it is practical to include a whole list of features. These would take up too much space, and complicate the information presented to customers as it can be quite technical and meaningless to non-technicians. Manufacturers often use different terminology to describe the same feature, which can cause further confusion.

19. *Combine the CIN card and Fuel Uses data onto one consumer information sheet*

Note that this item is not included in the original MoT safety proposals but is one MTA considers merits consideration.

Currently these two items are individually prescribed under government regulations. Both devices prescribe data which must be accessible to a consumer prior to purchase, but the forms are treated in different ways. CIN cards must be displayed on all second-hand vehicles offered for sale, the customer must be given a copy if they buy the vehicle and the dealer must retain a copy signed by the customer. The fuel use data must be provided on all new or used vehicles on display, but neither the customer nor the dealer is required to retain a copy. There is relevance in looking into whether the two devices can be included on a single point of sale device, which could also incorporate the proposed safety rating information as discussed above. This will reduce business compliance costs and provide a user-friendly single reference document for consumers.

20. *Improve the safety of the light vehicle fleet through the introduction of a scrappage scheme*

MTA supports the introduction of a consistent process to ensure the fleet is efficiently scrapped. This should be aimed at two levels. Owners of vehicles that have become uneconomic to repair should have immediate and easy access to a process that sees their vehicle handed in and broken down in an environmentally friendly way, with components recycled wherever possible and minimum waste produced.

At a secondary level are vehicles that may have some 'economic life' left, can get a WoF but none the less are old, do not have any modern safety features and are getting mechanically unsound. Removing these vehicles from the fleet in favour of more modern safer vehicles would improve vehicle safety and address other impacts such as poor fuel efficiency and environmental impacts, however there would need to be an incentive for owners to upgrade. MTA have previously put forward ideas on developing a product stewardship scheme initiative and request we be part of developing this initiative in the future.

21. *Revise WoF Standards to ensure advanced vehicle safety systems are properly maintained and working effectively*

MTA supports the proposal that the WoF continue to be updated to review the continued operation of new technology and safety features as they are introduced into legislation. This is however limited to the extent that a WoF is primarily a visual inspection and the regime's restrictions of practicality, time and keeping costs to consumers at acceptable levels.

22. *Mandate electronic stability control (ESC) for all light vehicles, new and used, entering the fleet*

MTA does not support that electronic stability control be mandatorily introduced into New Zealand. We are a technology taker and so are reliant on markets offshore introducing technology, then for that technology to be taken up here as the market demands. We are also in a period of major change where the industry is being required to produce cars that are safer, operate more efficiently and potentially use alternative fuels in the not too distant future. Requiring vehicles to comply with complex and sophisticated safety technology requirements may interfere with the introduction of other fuel efficiency and alternative fuel initiatives. This initiative would not only impact on entry of used imported vehicles but also new small, budget vehicles that may not have such advanced features available. An example may be micro vehicles that could be produced at very low cost, but with very basic features. These are getting closer to becoming a reality but may not include sophisticated technology such as ESC.

The Government is already heavily promoting ESC to fleet users who purchase a very high proportion of new vehicles entering the fleet, including use in the Government's own fleet. MTA supports this promotion and believe this will achieve the required outcome to improve the safety of the fleet over a relatively short time. Around 70% of new cars are purchased by business and Government buyers and these vehicles will progress on to other users. Efforts to influence corporate buyers have a significant flow-on effect to the wider consumer market.

We acknowledge that, once introduced into a vehicle, safety features need to continue to operate effectively. We support the approach that if ESC were to become a standard fleet-wide feature then mandating checks on continued in-service operation would need to be considered.

23. *Change the frequency of WoF for newer vehicles*

MTA does not support a change of WoF frequency for new vehicles. There is little evidence to indicate the motoring public are taking more responsibility for the maintenance of their vehicles, regardless of its age. There is a reliance by motorists on the WoF regime providing an important check mechanism to ensure roadworthiness and vehicle safety, both for their own vehicles and those of other road users. Until there is a significant improvement in New Zealand's road safety record, as well as a paradigm shift to drivers taking more responsibility for vehicle safety, there are no grounds or justification for changing this regime. These comments also apply to the WoF frequency for older vehicles, discussed below.

While we agree new vehicles are becoming more sophisticated and safer, the basic areas affecting safety such as tyres, wipers, brakes, lights, steering and suspension are still subject to wear and tear. When they are new, vehicles often travel far greater distances per year than older vehicles, consequently these basic components can wear out more frequently on newer vehicles.

MTA supports that a one year WoF for vehicles up to six years old continues.

24. *Change the frequency of WoF for older vehicles*

MTA does not support a change of WoF frequency for older vehicles. Pass fail statistics show that many motorists are not aware that faults that could lead to accidents are developing in their vehicle. People are also not getting their vehicle extensively serviced at regular intervals. A simple but frequent WoF inspection generally manages to find key faults that are developing in a vehicle before they cause an accident. At the moment vehicle faults do not feature highly as accident causal factors and we believe frequent WoFs are the reason.

MTA supports that a six month WoF for vehicles older than six years continues.

Improving the safety of heavy vehicles

25. *Publish heavy vehicle operator safety ratings*

MTA supports the Operator Safety Rating Rule that allows the publication of an operators safety rating based on their vehicle fleet safety record. A heavy vehicle involved in an accident can have a devastating effect on property and human life. Providing very direct incentives to fleet operators to minimise the reasons for their vehicles to cause accidents will improve vehicle safety.

MTA is also aware that for this initiative to be effective relationships between transport operators and the network of repairers and agencies they deal with to assist with vehicle and driver safety needs to be effective. Steps to ensure these relationships are positive are also essential if this initiative is to work.