

24 July 2009

Vehicle Dimensions and Mass Amendment
Rules Team
NZ Transport Agency
PO Box 5084
Wellington 6145

Dear Sir/Madam

SUBMISSION TO DRAFT LAND TRANSPORT RULE: VEHICLE DIMENSIONS AND MASS AMENDMENT [(No 2) 2009] - RULE 41001/5

1.0 Introduction

1.1 Hamilton City Council (HCC) welcomes the opportunity to make a submission to the NZ Transport Agency (NZTA) on the draft Land Transport Rule: Vehicle Dimensions and Mass Amendment [(No 2) 2009] - Rule 41001/05 (referred to throughout this submission as the 'Draft Amendment').

The submission is structured according to the following sections:

- 1.0 Introduction
- 2.0 Safety Implications
- 3.0 Process of Defining Designated Heavy Freight Routes
- 4.0 Increased Financial Assistance Required for Introduction of the Draft Amendment
- 5.0 Investment into Rail
- 6.0 Impact of the Draft Amendment on Hamilton's Transport Strategies
- 7.0 Concluding Comments.

1.2 The NZTA's Overview of the Draft Amendment proposes Rule changes that will broaden the grounds on which a heavy motor vehicle can operate in terms of weight and, in some cases, length. HCC notes that three changes are proposed through the Draft Amendment:

- To increase the maximum mass and certain dimension limits for vehicles operating up to 44 tonnes without the need for a permit.
- To allow road controlling authorities (RCAs) to issue permits (i.e. 'high-productivity motor vehicle' permits) for standard size vehicles to operate above 44 tonnes and up to 53 tonnes on specified routes that have been assessed by the RCAs, with conditions of operation specified in the permits.

- To allow the NZTA to issue high-productivity motor vehicle permits for increased overall vehicle length and associated dimensions for vehicles to operate above or below 53 tonnes gross mass on specified routes assessed by the NZTA, with conditions of operation specified in the permits.
- 1.3 The Ministry of Transport (MOT) state that information from trials and other studies shows that significant productivity benefits will accrue from an increase in the heavy vehicle limit from 44 tonnes to around 50 tonnes (and some length adjustments). They also state that as of early 2009 no further trials are being initiated.
- 1.4 The MOT claim that the proposed changes through introduction of the Draft Amendment will result in:
- Improved vehicle productivity (by 10 to 20%) by consolidating loads.
 - A reduction in the number of vehicle movements required to distribute freight (by up to 16%).
 - A reduction in fuel consumption (by up to 20 %).
 - A reduction in vehicle emissions.
 - Improved safety.
 - Increases to the nation's GDP (with estimates in the range of \$250-\$500 million per annum).
- 1.5 As a general comment, there appears to be no hard evidence from either the MOT or the NZTA that substantiates these claims. Provision of such information at an early stage would have enabled the public submission process to be considerably more informed and meaningful. HCC would appreciate the MOT and the NZTA making this information readily available to all affected parties.
- 1.6 The Minister has in fact stated in some recent media releases that *"trials showed the emissions, noise and vibration effects of heavier vehicles did not show 'measurable' increases"*. This statement appears to be in conflict with some of the claims outlined by the MOT in Section 1.4 of this submission.
- 1.7 HCC notes that trucks operating on New Zealand roads currently have the most generous weight limits outside of Australia.
- 1.8 Given the potential ramification that this Draft Amendment may have on the condition and safety of New Zealand's roads, HCC is very concerned over the relative short timeframe that the Bill has been developed in - almost appearing as if the Draft Amendment is a fait accompli. The Draft Amendment appears to have been fast-tracked at the expense of other legislation that could provide significant benefits for various travel modes e.g. development of legislation enabling bike racks to be installed on buses. Although this proposed change commenced at an earlier stage than the Draft Amendment it appears unlikely that the final legislation for 'bikes on buses' will be in place before 2011.

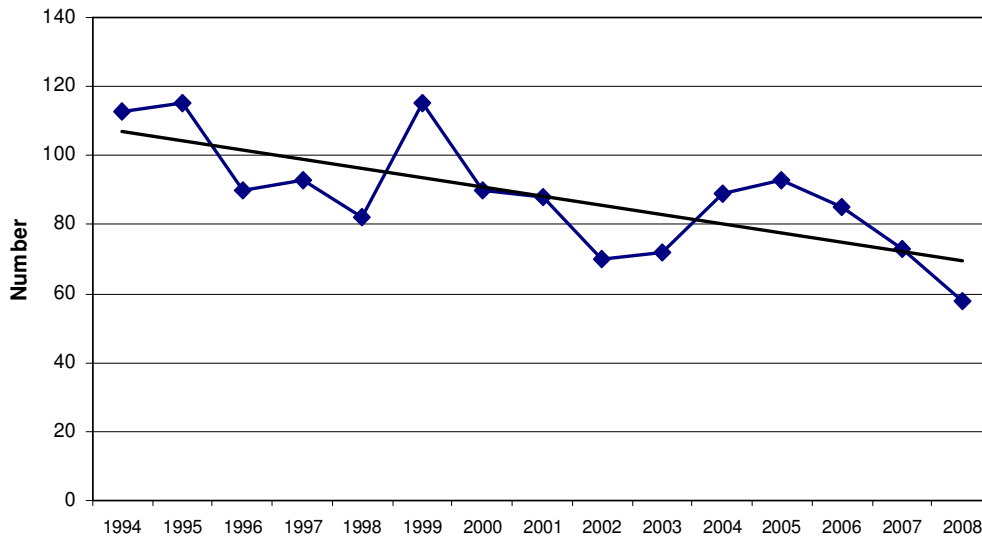
2.0 Safety Implications

- 2.1 HCC is concerned that the safety implications resultant from the Draft Amendment to the base 2002 Rule around Vehicle Dimensions and Mass (at both a regional and local level) have not been fully investigated and considered.
- 2.2 One of the key objectives of the base 2002 Rule around Vehicle Dimensions and Mass (Rule 41001) is that:

"The rule sets in place a regulatory regime so that vehicles, in particular, heavy truck and trailer combinations, are operated safely.....The rule includes new requirements aimed at improving vehicle stability and, thereby, reducing the incidence of rollover and loss-of-control crashes among heavy vehicles... The rule reduces the trailer: truck mass ratio so as to address the tendency of heavy vehicles with trailers to jack-knife while undertaking emergency manoeuvres, in particular, when braking into corners....The rule's provisions take into account recommendations of the 1996 Parliamentary Inquiry into Truck Crashes."

- 2.3 HCC notes that the 1996 Parliamentary Inquiry found that there was a widespread level of offending by truck drivers and trucking companies. A survey of 300 trucks stopped at random and checked for faults showed that an estimated 30% were being operated unsafely. High among the safety risks were:
- Inadequate brakes.
 - Steering faults.
 - Worn tyres.
 - Driver fatigue.
- 2.4 Appendix 1 of this submission contains a summary of the report from the Office of the Auditor General (OAG) that was released in March 2005 on progress in implementing key recommendations of the 1996 Transport Committee Inquiry into truck crashes. The Transport Committee made 67 recommendations on ways to improve the safety of trucking operations, with 7 key recommendations to be implemented immediately.
- 2.5 The introductory section of the March 2005 OAG report notes that *"All New Zealanders should be concerned about truck safety. Truck crashes currently account for about 20% of all road deaths and 7.5% of all road injuries. Truck drivers are not at fault in two-thirds of these crashes, but their impact can be more severe than other types of crashes, so it is important that trucks operate within acceptable speed limits and in a safe condition....Truck safety, however, is improving and the rate of fatal truck crashes is falling....but there is no room for complacency - the number of trucks on our roads is increasing, as well as total kilometres travelled, and the standard of truck brakes throughout the country is poor....Truck safety will continue to demand close attention."*
- 2.6 Recommendation 6 of the 7 key recommendations outlined in the OAG report (Appendix 1 of this submission) states that *"The Ministry of Transport should oversee our recommendations and develop an action plan for considering and implementing the recommendations. There should be a review at the end of six months on what short-term recommendations have been implemented and on the action plan for the other recommendations."* HCC would like to be informed of what progress the MOT has made in regard to this recommendation.
- 2.7 Clearly the safety of heavy vehicles operating on New Zealand's roads is of paramount concern to all parties when considering any amendment to the base 2002 Rule around Vehicle Dimensions and Mass.
- 2.8 Statistics from the MOT indicate that nationally the number of fatal crashes that involve a truck (for every 100 million kilometres driven by trucks) has on average continued to decline since the mid 1990's. The overall number of fatalities involving trucks has also decreased (refer figure below).

National Truck Fatalities (Year ending 31 December)



Source: NZ Transport Authority.

- 2.9 As the NZTA will be aware, the Waikato Region accounts for 9.4% of New Zealand's population almost 20% of the nation's freight passes through the region. Much of this movement is from goods being delivered to and from the country's two busiest ports - Auckland and Tauranga. Up to 28,000 vehicles travel on State Highway 1 through the Waikato on any given day. Of these vehicles up to 4,000 are heavy commercial vehicles, which often results in a number of negative effects for the city and region's transportation network. This issue will compound with traffic volumes on the Waikato's roads predicted to grow at an average rate of 3% per annum over the next 10 years. Road freight in the Waikato is also projected to almost double between 2006 and 2031.¹
- 2.10 This heavy usage of the road network corresponds to the Waikato Region accounting for the highest number of road fatalities, as well as the highest number of fatalities involving heavy vehicles.
- 2.11 The following table shows the number of road fatalities involving trucks (irrespective of who was at fault) for the whole country and the Waikato Region. Clearly the proportion of road fatalities involving trucks is significantly higher for the Waikato Region when compared with the national figures. For example, in 2008 the proportion for New Zealand was 15.85% compared to 22.67% for the Waikato Region. The difference in proportions between New Zealand and Waikato Region was particularly marked in 1996 (13.95%), 1997 (11.45%), 2002 (10.18%) and 2007 (12.45%) - refer column on the far right of the following table.

¹ The Ministry of Transport, Ministry of Economic Development and Land Transport New Zealand (now part of the New Zealand Transport Agency) - 'National Freight Demand Study' (September 2008).

**Road Fatalities Involving Trucks - Comparison between Waikato and New Zealand
1994-2008**

Year	Total Waikato Road Toll	Waikato Road Toll Involving Trucks	Percentage Share (%)	New Zealand Road Toll	New Zealand Road Toll Involving Trucks	Percentage Share (%)	Percentage Share Difference between Waikato and NZ (%)
1994	108	23	21.30	580	113	19.48	1.81
1995	108	21	19.44	582	115	19.76	-0.32
1996	89	28	31.46	514	90	17.51	13.95
1997	108	31	28.70	539	93	17.25	11.45
1998	85	21	24.71	501	82	16.37	8.34
1999	97	28	28.87	509	115	22.59	6.27
2000	107	30	28.04	462	90	19.48	8.56
2001	93	20	21.51	455	88	19.34	2.16
2002	65	16	24.62	485	70	14.43	10.18
2003	81	18	22.22	461	72	15.62	6.60
2004	84	23	27.38	435	89	20.46	6.92
2005	98	30	30.61	405	93	22.96	7.65
2006	68	12	17.65	393	85	21.63	-3.98
2007	94	28	29.79	421	73	17.34	12.45
2008	75	17	22.67	366	58	15.85	6.82

Source: NZ Transport Authority

- 2.12 As noted in Section 1.0 of this submission, the MOT claim that introduction of the Draft Amendment will result in improved safety. The Minister has stated in various recent press releases that *“Allowing some trucks on some roads to carry heavier loads would mean fewer trucks on the roads, reducing congestion and frustration for other motorists”*.
- 2.13 HCC has serious reservations about the MOT claim that increased safety will result primarily through less heavy vehicle movements on New Zealand’s roads i.e. in simple terms, the more freight tonnage that is allowed on a single truck will in theory equate to less vehicle movements. HCC would like the MOT to substantiate their claims around predictions of increased safety through introduction of the Draft Amendment. HCC does not wish to see a reversal of the decreasing truck fatality trend in the above figure.
- 2.14 Given that there is a 20.5% weight increase between a 44 tonne truck and a 53 tonne truck ,there is a corresponding 20.5% increase in braking distance required for the latter vehicle to come to a complete stop (assuming the same variables e.g. vehicle configuration, roading/driving conditions, driver behaviour/skill). This factor alone has the potential to impact negatively on the safety of all road users.
- 2.15 While the road freight sector has made a number of improvements towards increased vehicle safety, trucks still account for around 16% of all road deaths (refer table above). Most of these deaths occur on main roads between urban centres. This again supports the view better complementary use can be made of rail (as well as coastal shipping).

- 2.16 Although the Draft Amendment does not allow heavy vehicles to be wider or higher it does allow for longer vehicles. HCC has concerns around this as it will impact on a vehicle's turning ability and potentially compromise the safe operation of a vehicle, particularly on winding roads. In addition HCC is of the view that many parts of the potential designated routes were not designed to accommodate the types of vehicles allowed under the Draft Amendment.
- 2.17 There is also much anecdotal evidence suggesting that many heavy trucks often exceed the legal 90km/hour open road speed limit. Strict and ongoing enforcement of speed limits by the MOT (and other key factors such as ensuring that loads are secure) is paramount for the safety of all road users. In regard to enforcing legal speed limits, HCC would like to see greater use of speed limiters by trucking companies.
- 2.18 It is also worth noting that any compromises to vehicle and road safety that may result in more crashes would soon negate any of the MOT's claimed benefits around increases in vehicle productivity and the nation's GDP (as outlined in Section 1.4 of this submission).

3.0 Process of Defining Designated Heavy Freight Routes

- 3.1 HCC has concerns about the apparent lack of clarity regarding the process that the NZTA intends to use when defining heavy freight routes.
- 3.2 HCC assumes that State Highway 1 will form the backbone of this network. However, it is obvious that some of the smaller state highways that lead into main urban areas will also need to form part of the designated heavy freight route. In addition to the safety concerns outlined in Section 2.0 of this submission, HCC is also of the view that these types of routes may not be able to withstand the additional loads placed on them in their current state if trucks larger than 44 tonnes start using these routes on a frequent basis.
- 3.3 For example, in Hamilton's case State Highway 39 (which runs between Ngaruawahia and Otorohanga) is currently used as a bypass for heavy vehicles moving freight from Auckland through to Te Kuiti and then onto New Plymouth. Introduction of heavier traffic is likely to compromise the safety, condition, longevity and maintenance programme of such roads.
- 3.4 In addition, certain parts of the designated heavy freight road network may not be capable of accommodating trucks over 44 tonnes.
- 3.5 Given the implications of the finalised designated route for heavy vehicles, HCC would like the opportunity to work with NZTA in the identification and designation process.

4.0 Increased Financial Assistance Required for Introduction of the Draft Amendment

- 4.1 HCC is aware that a Funding Assistance Rate will be made available for the designated heavy traffic routes. However, trucks delivering goods at their destination will, in most cases, need to go off the designated routes and use a number of arterial/local roads to deliver their freight within a city or district.
- 4.2 HCC is particularly concerned about the potential damage that heavier trucks may have on these arterial/local roads. In Hamilton's case, these vehicles will use a large number of such roads in Hamilton due to the spread of the city's

industrial areas (meaning that HCC will be unable to determine such routes once the trucks have arrived at the city's boundary).

- 4.3 Given the above HCC requests that NZTA provide a substantial increase to the local authority Funding Assistance Rate. In Hamilton's case this would be used to maintain all arterial and collector roads in the city.
- 4.4 The Draft Amendment appears to make no provision for situations where vehicles above 44 tonnes fail to use designated routes. Clear enforcement provisions for non-complying heavy vehicles need to be established and implemented by the MOT.
- 4.5 This situation will vary considerably between regions. For example, as noted in Section 2.7 of this submission, although the Waikato accounts for 9.4% of New Zealand's population, almost 20% of the nation's freight passes through the region, with up to 28,000 vehicles travelling on State Highway 1 through the Waikato on any given day (4,000 of these being heavy commercial vehicles). Traffic volumes on Waikato's roads is predicted to grow at an average rate of 3% per annum over the next 10 years, with road freight in the region projected to almost double between 2006 and 2031.²
- 4.6 The doubling of road freight on Waikato roads will in itself place considerable extra 'wear and tear' on the region's road network. This 'wear and tear' is likely to occur considerably sooner if heavier trucks are permitted to use designated parts of the region's roading network. Information from the New Zealand Institute of Professional Engineers (IPENZ) states that an increase in a truck's axle weight from 8 tonnes to 9 tonnes results in a corresponding increase in pavement wear of 60%. It is apparent then that increasing the freight load a truck can carry (from 44 tonnes through to 53 tonnes) will have significant ramifications on the longevity of New Zealand's roading system.
- 4.7 There are numerous international studies that clearly document the damage to roads caused by the ongoing movement of heavy trucks, that utilise the fourth power rule with respect to axle loading weight. The origin of this rule is the AASHO Road Test undertaken by the American Association of State Highway Officials in 1958. Despite its age, this \$27 million test (1960 dollars) is still the most internationally accepted and quoted study and is regarded as the 'benchmark' of such tests and its findings have been updated several times in AASHO pavement design guides. The AASHO Road Test introduced many concepts in pavement engineering, including the load equivalency factor. This test concluded that heavier vehicles reduced pavement serviceability in a much shorter time than light vehicles, and that the relationship between heavier axle loads to weight damage is an exponential rather than linear compound relationship. This forms the current basis of the Road User Charge regime used in New Zealand for heavy freight vehicles.
- 4.8 The funding provision over the next 10 years for maintenance of roads in the Waikato Region is based on considerable research and analysis which is reflected in programmes contained in:
 - The 2009-19 Waikato Regional Land Transport Strategy.
 - Environment Waikato's 2009-19 LTCCP.

² The Ministry of Transport, Ministry of Economic Development and Land Transport New Zealand (now part of the New Zealand Transport Agency) - 'National Freight Demand Study' (September 2008).

- The 2009-19 LTCCPs of the region's constituent district councils and Hamilton City Council.
- 4.9 The road maintenance programmes outlined in these documents have taken no account of the potential implications resultant from the introduction of the Draft Amendment.
- 4.10 HCC is of the view that additional funding requirements for increased road maintenance should be provided from a combination of an increase in road user charges (which at best recovers 56% of attributable costs imposed by heavy trucks³) as well as through additional funding from the NZTA. However, HCC recognises that there is a limit to the costs that can be recovered from trucking firms (through increases to road user charges) without compromising the viability of this industry i.e. a level of subsidy will always be required.
- 4.11 If additional funding were to be provided by the NZTA, HCC would be concerned if this resulted in a reduction of funding for other roading projects.
- 4.12 Introduction of additional funding from the NZTA could be established by way of a new Activity Class (to be added to the table outlined in Section 5.3 of this submission) that specifically addresses road maintenance resultant from introduction of the Draft Amendment.
- 4.13 HCC endorses the point raised about ongoing monitoring of key sites along designated heavy vehicle routes made in the Regional Advisory Group submission on behalf of the Waikato Regional Transport Committee i.e. Introduction of such a monitoring system would provide evidence of the impacts of permitted routes on infrastructure which could then be used to support appropriate NZTA funding policies.

5.0 Investment into Rail

- 5.1 The country's roading network currently accounts for almost 70% of all freight movements. HCC supports getting more freight currently carried by trucks onto rail, particularly as in many instances freight trains are running under capacity. In most cases it is likely that the country's existing rail corridors will be in reasonably close alignment with the proposed designated heavy freight routes.
- 5.2 It is suggested that rail provides better opportunities for improved payload, fuel, social, environmental and operational economies of scale over the long term, with the potential added benefit of reducing the number of heavy vehicle movements on the country's roads - leading to greater safety as well as less 'wear and tear' on the country's roading system. HCC is committed to seeing more investment placed into the North Island Main Trunk and East Coast Main Trunk lines.
- 5.3 This increased use of rail supports the 2008 New Zealand Transport Strategy's vision that by 2040 *"People and freight in New Zealand have access to an affordable, integrated, safe, responsive and sustainable transport system."*
- 5.4 HCC is of the view that there is a lack of funding from central government in the May 2009 Government Policy Statement (GPS) on Land Transport Funding (2009/10 - 2018/19) to assist initiatives that allow the New Zealand Transport Strategy 2008 projected 2040 mode shift targets to be met (particularly given

³ Surface Transport Costs and Charges: Main Report (Ministry of Transport, March 2005).

that MOT predictions are for a doubling of freight volumes between 2006 and 2031).

- 5.5 The following table (reproduced from the May 2009 GPS on Land Transport Funding - 2009/10-2018/19)) clearly shows the relative shortfall in the \$2 million funding allocated to rail and sea freight compared to other activity classes.

Indicative National Three Year Activity Class Funding Allocations for the Period 2009/10 - 2011/12

Activity Class	Indicative Three Year Allocations (\$ Million)
New and Improved infrastructure for State highways	3,055
Renewal of State highways	645
Maintenance and operation of State highways	885
New and improved infrastructure for local roads	550
Renewal of local roads	685
Maintenance and operation of local roads	755
Road policing	900
Public transport service	635
Public transport infrastructure	135
Demand management and community programmes	145
Walking and cycling facilities	50
Sector training and research	18
Domestic sea freight development	3
Rail and sea freight	2
Transport planning	105
Management of the funding allocation system	100

Source: Government Policy Statement on Land Transport Funding 2009/10 - 2018/19 (May 2009)

- 5.6 KiwiRail has stated that at least one ferry will need replacing by 2016 and that around 200 kilometres of existing track is nearing the end of its life. In addition to ongoing maintenance and upgrading requirements of the rail network, a number of bridges need repairs, many of the current locomotives are underpowered and bigger wagons are needed.
- 5.7 HCC notes that central government has recently funded 20 new locomotives for key freight routes, 100 new wagons for heavier loads and 17 new carriages for the Tranz Scenic tourist business. While these improvements are welcomed, KiwiRail is of the view that it still requires a \$2 billion injection over the next five years, half of which it can raise but for the rest it is still reliant on central government.
- 5.8 HCC supports improving modernity of tracks, rolling stock and associated infrastructure and would like to add that motive power and signalling upgrades are also critical.
- 5.9 HCC also considers there is a need for increased regional/local authority influence over rail corridors, through statutory jurisdiction/partnership with key stakeholder organisations. This would help to assist rail development and

associated road and rail transport corridor decisions that work towards the clear government objective of having an integrated transport system.

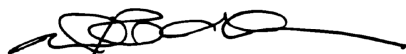
6.0 Impact of the Draft Amendment on Hamilton's Transport Strategies

- 6.1 HCC is currently reviewing its transportation strategy for the city known as Access Hamilton. This Strategy commits the city to integrated transport and land use planning and making greater travel choices a reality. The final Strategy will also incorporate a Network Action Plan which is one of seven action plans that coordinates and prioritises the various activities developed to implement the Access Hamilton Strategy.
- 6.2 HCC has concerns about the potential impacts that the Draft Amendment may have on both Access Hamilton and its associated Strategic Network Action Plan.

7.0 Concluding Comments

- 7.1 HCC trusts that the points made in this submission are helpful to the NZ Transport Agency when considering all submissions to the proposed Vehicle Dimensions and Mass Amendment rule change.
- 7.2 HCC **does wish to be heard** at any hearings to be held by the NZ Transport Agency in support of this submission.
- 7.3 If you require clarification of the points raised in this submission, or additional information, please contact Philip King (Council's Transport Services Manager) on 07 838 6991 or email philip.king@hcc.govt.nz

Yours faithfully



Michael Redman
CHIEF EXECUTIVE

APPENDIX 1

Summary Report from the Office of the Auditor General on Progress in Implementing Key Recommendations of the 1996 Transport Committee Inquiry into Truck Crashes (May 2005)

In 1996, Parliament's Transport Committee (the Committee) conducted an inquiry into the causes of fatal truck crashes on New Zealand roads. The Committee's inquiry resulted from public and industry concern at the growing number of fatal truck crashes on New Zealand roads at a time when deaths from car accidents were declining significantly. In 1995, 118 people died in 105 fatal crashes involving at least one truck. As a percentage of all road fatalities, truck crash deaths were then at their highest level for 25 years.

The OAG assisted with the Committee's 1996 report.⁴ In their *Annual Plan 2003-04*⁵ the OAG signalled its intention to undertake a follow-up audit of progress in implementing the Committee's recommendations.

Their follow-up audit looked at:

- The extent to which Government agencies have implemented the 7 recommendations in the 1996 report aimed at improving truck safety, which the Transport Committee believed could be quickly implemented.
- The action taken on other truck safety initiatives.
- Whether the number of fatal truck crashes has fallen since 1996.

Reference in this report to a truck means a heavy motor vehicle with an unladen weight of more than 3.5 tonnes. There are currently more than 85,000 trucks on New Zealand's roads.

The OAG's audit involved:

- Seeking the comments of relevant Government agencies on the action taken since 1996 to implement the Committee's recommendations.
- Obtaining accident trend and enforcement statistics from the LTSA and the Police.
- Analysing the information obtained to show the extent to which the Committee's recommendations had been implemented and truck crash statistics improved.

In 1996 the Committee identified a number of underlying causes for the high number of truck crashes, including:

1. A widespread level of offending by truck drivers and trucking companies. A survey of 300 trucks stopped at random and checked for faults showed that an estimated 30% were being operated unsafely. High among the safety risks were:
 - Inadequate brakes.
 - Steering faults.
 - Worn tyres.

⁴ *Report of the Transport Committee on the Inquiry Into Truck Crashes*, parliamentary paper I. 13B.

⁵ B.28AP(03), page 56.

- Driver fatigue.
2. The poor attitude to road safety of some trucking companies. Bad practices included:
 - Signing up owner-drivers to contracts that effectively required them to set work schedules that encouraged driving at excessive speeds.
 - Requiring drivers to work excessive hours.
 3. Inadequate enforcement of laws designed to ensure greater safety on the roads; in particular:
 - Lack of police enforcement of truck speed limits.
 - Lack of specialist police to effectively enforce laws to prevent overloading and ensure mechanical safety.
 - Lack of enforcement within the trucking industry of legal provisions designed to improve workplace safety.

The Committee made 67 recommendations on ways to improve the safety of trucking operations, naming 7 to be implemented immediately. These recommendations are listed below. The Committee asked the Ministry of Transport to coordinate action on the recommendations. The Ministry reported 3 times to the Committee, and relevant extracts from the 3 reports have been included in the full OAG report.

The 1996 Transport Committee's 7 key Recommendations

Recommendation 1	<i>Truck speeds must be reduced to their legal limits. We have found that, currently, there is effectively no enforcement of the truck speed limits. The Police must give priority to enforcing truck speeds. The Police have taken delivery of new laser speed guns and, as part of the Police Speed Control Project, need to direct more of these resources into enforcing truck speeds.</i>
Recommendation 2	<i>The Police should place less emphasis on issuing offence notices and instead should make more use of their existing powers to order the removal of trucks from the road that are a risk to safety of other road users. The Commissioner of Police should issue a directive to staff reminding them of the need to take such action.</i>
Recommendation 3	<i>The roadside weigh stations operated by the Police to check trucks should on occasion be operated for 24-hour periods rather than the current average of 6 to 7 hours. The current opening times of weigh stations mean that not all trucks can be checked.</i>
Recommendation 4	<i>The Commercial Vehicle Investigation Unit (CVIU) should be allocated a substantial proportion of the truck enforcement hours that have been allocated to the other Police staff, but which are not being used on a routine basis. This unused resource, if allocated to the CVIU, currently equates to 4.7 extra staff for the first eight months of the year. This is the equivalent of seven extra staff per annum, who could be used to provide additional enforcement in particular problem areas, such as the Auckland motorway system.</i>
Recommendation 5	<i>The Commercial Vehicle Investigation Unit should operate on the basis of being one national unit to enhance co-ordination of staff and improve enforcement.</i>

Recommendation 6	The Ministry of Transport should oversee our recommendations and develop an action plan for considering and implementing the recommendations. There should be a review at the end of six months on what short-term recommendations have been implemented and on the action plan for the other recommendations.
Recommendation 7	The Health and Safety in Employment Act 1992 should be applied immediately to truck operations by the Occupational Safety and Health Service, in conjunction with the Police, especially for serious offending where the full force of the Act is justifiable.