



**ROAD TRANSPORT FORUM NEW ZEALAND INC  
SUBMISSION TO THE NZTA  
ON THE  
Agricultural Vehicles Omnibus Rule**

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## **SUBMISSION BY ROAD TRANSPORT FORUM NEW ZEALAND TO THE NZTA ON THE AGRICULTURAL VEHICLE OMNIBUS RULE**

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### **1.0 Comment**

- 1.1 We welcome the opportunity to comment on the draft rule. In May 2012 we stated that the road freight industry did not support the majority of proposals that were being discussed in the Agricultural Vehicles Discussion paper. Since then our serious concerns have not been assuaged.
- 1.2 The road freight industry is fundamentally opposed to creating an environment which provides significant dispensations from the strict vehicle and occupational compliance regimes designed to promote on-going occupational and road safety.
- 1.3 The draft rule has built on the unsafe and anticompetitive practices that were proposed in the discussion paper and has presented them in a way that implies that there would be no adverse effects if they are adopted.
- 1.4 If as suggested agricultural machinery is to be driven at higher speeds on the open road, by comparatively less experienced drivers and with lower compliance thresholds it is essential that they meet at least the same standards imposed on other road users transporting loads at similar mass and speed otherwise safety will be compromised.
- 1.5 Representatives of the agricultural contracting industry have commented that a number of legislative requirements constrain their industry and that relaxations are required to enable greater efficiencies. Part of that increased efficiency will be created through the exemptions that have been given from road user charges and compliance requirements.

- 1.6 No acknowledgement has been given to the unacceptably high rate of accidents in the agricultural sector and the Government's desire to reduce those rates. Permitting potentially unskilled agricultural workers to operate agricultural machinery in the public domain at higher speeds for longer periods (far in excess of the 14 hours per day provided by the work time rule) of time with lower compliance thresholds is seriously inconsistent with both worker and public sector objectives.
- 1.7 The road freight industry is also under constant pressure to improve efficiencies but this has to be achieved by working within understandably strict mandatory requirements that the regulator regards as "bottom lines". The inefficiencies that the agricultural sector complains about are not so much a result of inept legislation but rather the agricultural industry's reluctance to be similarly constrained. Amending legislation as suggested will not lead to the agricultural sector performing more efficiently and may well prove counterproductive.
- 1.8 We also question the penalties for people operating agricultural equipment outside of the relaxed bounds set by the proposed rule. No indication is given of penalty for non-compliance with the rule. The HSE Act is quoted within the rule in regard to occupational safety but there is no mention of penalties for not complying with land transport legislation. Providing advice of the magnitude of these penalties would reinforce the rule.
- 1.9 Proposal 1 seeks to exempt "agricultural vehicles" from a range of requirements that apply to other transport modes by redefining "agricultural motor vehicle, agricultural tractor, agricultural purpose, and agricultural trailer".
- 1.10 The definitions are predicated on the basis that they relate specifically to vehicles that are designed and predominately dedicated to performing agricultural tasks. Vehicles that are designed or constructed for general road use, land management operations, or

trailers that are designed for the carriage of goods are not included in these definitions and are therefore considered differently.

- 1.11 The problem we see is that a number of "agricultural vehicles" (trailers included) have been designed with dual purpose capability. This is where the rule's purpose becomes hazy as there are dedicated agricultural vehicles that are being operated with a singular purpose while there are other agricultural vehicles with dual purpose capability that makes them equally at home on the road or off road.
- 1.12 The rule defines "agricultural purpose" yet that definition enables dual purpose vehicles to perform functions under the guise of being dedicated agricultural vehicles (for example agricultural tractors and trailers) that are serving agricultural needs but which are not strictly of an agricultural nature.
- 1.13 For example, below is a photograph of a pair of vehicles in combination that the proposed amendments would encapsulate. According to the rule these vehicles would be deemed to be an "agricultural vehicle" and "agricultural trailer" but their use at the point of time of being photographed is not purely for an "agricultural purpose". Both vehicles are being used to transport goods.
- 1.14 Being operated in this way takes each of the vehicles beyond the defined terms suggested by the rule and as such they should be treated as any other vehicle would. Other vehicles are required to meet a range of requirements including Road User Charges, periodic inspections and mass limitations (to name a few).
- 1.15 During the course of our submission we will refer back to this picture. Incidentally, this is one of a range of pictures that are typically sent to us by our members and other road users. The casual observer would recognise this scene as fairly typical for any rural/semi rural setting in New Zealand.

1.16 The picture shows a total lack of compliance with even the most basic of road safety rules. The rear of the trailer lacks lighting and parts of the load are unrestrained. As an overwidth load, approved OD hazard panels would be required. None are fitted to either tractor or trailer.

1.17 An experienced observer would notice that the trailer is a retiree from the road freight industry that has been significantly modified to transport greater payloads than road transport legislation allows. The significant modifications include excess front and rear overhang and lack of rearward under run protection. The trailer is also un-braked.

1.18 We doubt that the changes proposed in the rule will encourage greater compliance from the agricultural sector. The rule will set in place further relaxations that only encourage agricultural contractors and agricultural vehicle users to flout the law with impunity.



## **RESPONSE TO PROPOSALS**

### **2.0 Proposal 1**

From the outset **Proposal 1** broadcasts the policy divergence between agricultural vehicles and other heavy vehicles. For example, heavy trailers that are towed behind commercially operated trucks are required to have annual safety inspections and pay road user charges. Agricultural vehicles are exempted from these requirements.

2.1 The picture above clearly highlights the divergence between agricultural and road freight vehicles. Road freight vehicles could not legally be operated in the manner pictured. Neither should agricultural vehicles be allowed to.

2.2 Clearly there is a need to have these vehicles inspected more rigorously than as proposed. The inherent faults in the combination pictured (or for any other agricultural vehicle being operated on the public road) clearly display that regardless of travel speed these vehicles present a safety concern.

2.3 The suggestions for amendment to the Road User Rule therefore require fine tuning by precluding agricultural vehicles that might be used to transport goods on road. This could be achieved by widening the definition of "agricultural purpose" to include loads transported for hire or reward or for other parties. Nor should these vehicles be operated for commercial gain beyond 5 km's of the farms main gate.

2.4 Non-dedicated agricultural trailers should also be included. Doing so would ring fence towed dedicated agricultural equipment like harrows, ploughs and harvester trailers but leave trailers that are clearly not being used for agricultural purposes to comply with non-agricultural requirements.

- 2.5 On the majority of New Zealand's rural roads commercially operated trucks (and trailers) can only be operated at speeds approximate to those of agricultural vehicles. Rural road design and its effect on vehicle speed and safety has been recognised by NZTA's speed setting group who are considering lowering speed limits in rural environments. There is no reason that the same exemptions that are being offered to agricultural vehicles can't be offered to commercial transport operators that are operating in rural environments.
- 2.6 The rule's developers should also be careful in this respect as there is a growing number of disgruntled transport operators who are considering becoming agricultural contractors to take advantage of the relaxed operating conditions being offered. Doing so will do away with the extra burden of having to gain a Transport Service Licence to operate and will reduce RUC burden. Operators would also be able to hire less qualified drivers who would also be exempted from work time and logbook requirements while also being able to take advantage of relaxed fatigue management regimes.
- 3.0 **Proposals 2 to 7:** Are intended to address work time and fatigue issues by making changes to the Land Transport (Driver Licensing) Rule 1999 (the Driver Licensing Rule) and Land Transport Rule: Work Time and Logbooks 2007 (the Work Time and Logbooks Rule).
- 3.1 None of these proposals match the policy that applies to heavy vehicle operators. Safety policy is being relaxed for a group of comparatively less skilled and less competent agricultural vehicle operators. Doing so will also create unreasonable inequities between road freight transport and agricultural vehicle drivers.
- 3.2 On one hand we have skilled professional truck drivers that are heavily regulated to reduce fatigue risk yet on the other hand we have comparatively less skilled/qualified agricultural vehicle operators working on the same public thoroughfares at similar times as

commercial truck drivers and being offered relaxations from requirements that should apply to both. This is a recipe for disaster.

- 3.3 The agricultural industry already has a high injury rate. Allowing workers in this sector to reduce rest time and to work longer can only increase injury exposure.
- 3.4 Within the rule consideration has been given to road safety related issues but no thought has been given to the consequences of allowing people to fatigue themselves for agricultural purposes and then continue on to work immediately afterwards in alternative employment.
- 3.5 To maximise earning potential people temporarily (or permanently) engaged in agricultural activities will attempt to work for as long as they can in those roles and then immediately afterwards return to their principal employment. There is a distinct probability that people taking advantage of the fatigue related relaxations will extend work time beyond reasonable expectations.
- 3.6 The rule mentions that HSE regulations would apply to these people but it is naïve to expect that employees that are seeking to increase earnings potential will self-regulate and limit that earning potential. The work time and logbook rule requisites and alternative fatigue management programmes manage these concerns. Diluting them as suggested can only exacerbate fatigue concerns in the agricultural sector.
- 3.7 **Proposal 4:** Extends the range of agricultural vehicles that can be operated by the holder of a Class 1 driver licence.
- 3.8 The proposal to allow younger and less skilled drivers take control of larger agricultural equipment on New Zealand's roads is reckless. Crash data shows that the most vulnerable drivers on the road are males aged between 16 and 24. These are the same drivers that agricultural safety relaxations are being provided for. Statistically this

group are already high risk. Providing this group of drivers with safety relaxations will only compound their already poor risk profile.

3.9 To ensure equity between the agricultural sector and road freight vehicles the Class 2 licence threshold must be revised to 25 tonnes laden or unladen (tare).

3.10 **Agricultural licence endorsement**

The suggestion to create an agricultural licence endorsement seems sensible. We see no reason why the same vehicle mass threshold opportunity shouldn't be offered to aspiring and currently employed truck drivers also.

3.11 **Proposal 7:** Suggests incorporating in the rule the principal features of the current Work Time Variation for Critical Agricultural Operations to provide for an agricultural variation that applies to the sector as a whole.

3.12 We are very dubious about the safety outcomes of (or need for) this proposal. The discussion relating to agricultural variations raises three main issues of apparent concern. They are that:

- the current requirements are not responsive to the needs of the agricultural sector, for example, in addressing the shortage of agricultural motor vehicle drivers, particularly those who hold Class 2 licences;
- the speed to which agricultural motor vehicles are restricted presents a safety risk to those vehicles and other road users when travelling with other vehicles on the road;
- work time restrictions are poorly aligned with the seasonal and weather driven demands on the industry.

3.13 We share the agricultural sector's distress at the lack of adequately skilled and licensed drivers available to operate machinery. The road freight industry is in constant demand for adequately skilled and licensed drivers.

- 3.14 The seasonal concerns that affect the agricultural industry also affect the road freight industry- but to a greater degree. Seasonal herd shifts, festive seasons, milk harvest demands and deliveries to coastal and international shipping being just a few examples of the time sensitive and cyclical nature of activity which constantly stretches the road freight industry's resources.
- 3.15 Transport operators are mandated to compensate for driver shortfall through more traditional mechanisms such as employing additional staff or putting on extra vehicles. They must also do so to fit within employment and fatigue related regulations. Extreme labour shortages may also be met by employing migrant drivers. The road transport industry is also able to take advantage of short term work time variations.
- 3.16 We are unsure why the agricultural sector is unable to utilise these opportunities in the same manner that the road freight industry does as similar options are also being offered to the agricultural sector. The work time variations being sought by the agricultural sector are to cater for the same predicaments that the road freight industry constantly confronts.
- 4.0 **Proposal 8:** Introduces the concept of updating the Heavy Vehicles Rule to reflect the current practice for towing connections between heavy agricultural motor vehicles.
- 4.1 The clauses that are being replaced in the Heavy Vehicles Rule currently ensure that towing connection safety information is placed in readily visible positions on machinery. This provides valuable advice to machinery owners without having to consult rules or other documents. This is an uncomplicated approach to safety.
- 4.2 The proposal is to remove the requirement to place actual safety information on machinery and instead to place towing connection

information within the Heavy Vehicles Rule. This would create complications for machinery users.

- 4.3 Commercial transport operators are familiar with this rule. The towing devices on commercial transport operators' vehicles are also subject to independent design, certification and inspection. None of these situations apply to agricultural contractors or agricultural vehicle users.
- 4.4 To attempt to recreate similar criteria for agricultural vehicle use is misguided. If information is to be provided to the agricultural sector it seems sensible to place it within documents that that industry is familiar with. These requirements should be placed within the Agricultural Vehicles Guide.
- 4.5 The quality of engineering modification on the trailer that is being towed in the picture above is questionable.
- 4.6 The trailer is obviously a modified heavy road freight trailer that has been retired from service. These vehicles are usually retired from use when maintenance costs exceed the residual value of the vehicle. Unquestionably the trailer would have had a number of faults that lead to its retirement from road freight operations.
- 4.7 The agricultural sector operates a large number of retired road freight vehicles. Few of these vehicles enter the agricultural sector without being modified afterwards. The quality of those modifications is seldom checked.
- 4.8 If this trailer was to be towed by a truck its primary structural components would be required to be certified- regardless of operating speed, distance travel or load mass. It would also be required to be periodically inspected. However, it is not being towed by a heavy vehicle and is therefore wrongly being deemed to be safer in the hands of agricultural operators.

- 4.9 While on the topic of periodic inspection, obviously the front and rear of the trailer have been extended. It is doubtful (given the excess amount of overhang) that these modifications have been carried out according to Land Transport regulations, specifically the Repair rule and the Vehicle Dimensions and Mass rule. Yet this vehicle will be allowed to transport exactly the same loads as road freight vehicles without the same compliance or safety requirements.
- 4.10 The Heavy Vehicle Brakes Rule also exempts the trailer being towed from having to be fitted with operable brakes because it is considered to fit within the range of vehicles referred to within clause 2.2(2) of that rule. The brake rule's developers could never have envisaged that brake exemptions would cover trailers such as those in the picture above.
- 4.11 The trailer shown is transporting loads of similar mass to those transported by road freight vehicles in an un-braked condition. The vehicle towing the trailer would also have substantially less braking capacity than a similarly sized heavy vehicle. This vehicle combination is patently unsafe and is not an isolated case.
- 4.12 While the discussion document takes care to mention that agricultural vehicles are involved in a minimum of crashes, enabling vehicle combinations to be operated in the manner shown significantly increases safety risk. For that reason vehicles of this type and use should be subjected to requirements similar to those that apply to road freight vehicles.
- 5.0 **Proposal 13:** Require amber beacons to be displayed and operated on agricultural motor vehicles.
- 5.1 The suggestion to make agricultural vehicles more visible to oncoming traffic is sensible. However, recommending the use of

beacons only is too limiting. Other very efficient light sources are available and are affordable.

5.2 We suggest also encouraging the use of light sources that have similar intensity and stroboscopic affect as beacons.

5.3 This requirement should be applied retrospectively. Fitting beacons (or similar devices) to all agricultural powered vehicles will provide necessary consistency for other road users. To improve consistency beacons or similar devices should be of similar colour.

5.4 A number of agricultural vehicles are already fitted with amber flashing beacons. It is sensible to ensure that future requirements insist that beacons or their alternatives project amber coloured light.

6.0 **Proposal 14:** Amend the Rule to allow for:

(a) The removal of the periodic (warrant of fitness/certificate of fitness (WoF/CoF)) inspection requirement for agricultural motor vehicles that are operated at speeds not exceeding 40 km/h

(b) A revised and simplified WoF inspection for agricultural motor vehicles that are operated at speeds exceeding 40 km/h, with no CoF requirement

(c) Annual vehicle inspections for vehicles that are operated at speeds exceeding 40 km/h, rather than six monthly

6.1 The situation in the photo above is fairly typical of agricultural machinery which highlights another of our concerns- that the rule amendments will be put in place, but given the lack of enforcement in rural areas, compliance will be minimal. If enforcement is minimal safety must be ensured by ensuring that vehicles are inspected regularly and competently.

6.2 While the 40kph demarcation sets a useful reference point for licensing and some vehicle operating requirements it is totally

irrelevant and unrelated to vehicle safety system maintenance. Although it is proposed that there will be no periodic inspection (WoF/CoF) for agricultural vehicles licensed to operate up to 40 km/h, operators will still be subject to a duty to keep their vehicles in a road worthy condition when operating on road, including meeting legislated requirements.

- 6.3 If operators are to be subject to a duty of care then audits should be performed to monitor compliance. This is especially so if vehicles are not inspected by independent inspectors.
- 6.4 The condition of the vehicles in the photograph above shows that these requirements are not currently being met by agricultural vehicle operators. Further relaxing their obligations won't address this.
- 6.5 Either way, if vehicles are to be self inspected or inspected by independent personnel the audit process should be completed by declaratory documentation. The MBIE (Labour) Approved Code of Practice for Cranes<sup>1</sup> is a useful reference for developing this documentation as numerous crane types are subject to self and independent maintenance and inspection.
- 6.6 The 40 kph demarcation does not take into account an agricultural vehicle's primary function. For example, dedicated seasonal harvesting equipment is utilised differently than agricultural contracting tractors or similar vehicles that have dual purpose roles. Vehicles with dual purpose roles should be treated differently than dedicated purpose vehicles, especially if part of that dual purpose is to operate on roads.
- 6.7 If vehicles are to transport goods or be used for a non-agricultural purpose on road (refer to para's 2.3 & 2.4 above) they should be

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<sup>1</sup> Page 73 and appendices  
[www.osh.dol.govt.nz/order/catalogue/pdf/cranes-acop-2009.pdf](http://www.osh.dol.govt.nz/order/catalogue/pdf/cranes-acop-2009.pdf)

subject to safety inspections. Dual purpose vehicles spend considerable amounts of time travelling on roads and should have more regular and in depth inspections.

6.8 Inspection regimes for cars currently enable annual inspections until they are 6 years old after which inspections are required to be carried out 6 monthly. The same could be applied to new agricultural vehicles. Once six years has been reached inspection periods could be conducted six monthly or according to any other regular occurrence. This concept also fits with other maintenance and inspection rationale which is discussed later in our submission.

6.9 It would also be appropriate to base agricultural vehicle inspections according to hours of service. Hours of service more closely reflect component deterioration. A maximum period of 2000 hours service life between inspections would be appropriate.

6.10 Basing vehicle maintenance regimes around a vehicle's supposed operating speed is problematic. The speed at which a vehicle may be operated provides little indication of its operational safety.

6.11 It seems more sensible to base vehicle inspections and maintenance regimes on vehicle mass capability rather than speed. In terms of engineering longevity vehicle structures and components are more likely to suffer accelerated wear through increased mass imposition rather than marginal speed increases (40 kph as opposed to 30 kph).

6.12 For example, the kinetic energy of the vehicle combination pictured above being operated at 30 kph is similar to that of a midsized car being driven at 120 kph.

6.13 Kinetic energy defines the amount of work required to accelerate (or decelerate) a body of mass. Disregarding reaction time and distance we would expect that the combination shown above operating at 30 kph would take longer (and would be less safe) decelerating to a stop than a midsized car travelling at 120 kph.

6.14 This highlights another fundamental flaw in the supposed safety perceptions accompanying the rule's proposals and leads us into the topic of brakes and brake inspection.

## 7.0 **Additional Comments**

### **Brakes**

7.1 As mentioned earlier the brake rule exempts "agricultural vehicles" from having to comply with heavy vehicle brake requirements and as discussed we believe that doing so increases risk.

7.2 There are an array of land transport and related rules that require that vehicles (road based or otherwise) are safe and operated in a safe manner. The current Vehicle Licensing Reform has highlighted that brake faults are one of the three main mechanical faults that cause crashes.

7.3 Brakes should therefore be prioritised in agricultural vehicle safety inspections. The difficulty is that a large number of powered agricultural vehicles would not be able to be inspected on regular/standard brake test machines or by existing methods.

7.4 Alternative test methods do exist and they have been rigorously evaluated by respected overseas organisations. We recommend that the contents of the EPIC and OPERC guidance document: Brake Testing for Rubber-tyred Vehicles be given consideration for testing agricultural brake systems in New Zealand.

7.5 The guidance document has been a useful resource overseas and provides valuable information that would enhance agricultural vehicle brake safety in New Zealand<sup>2</sup>.

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<sup>2</sup> The document is available at the following web site:  
[http://www.operc.com/bs\\_itemdetails.asp?type=pub&prod=38](http://www.operc.com/bs_itemdetails.asp?type=pub&prod=38)

- 7.6 Naturally these requirements shouldn't be applied to dedicated agricultural trailers or towed agricultural equipment that are not designed to carry goods. The guide covers a range of situations but of most value are discussions on test sites and frequency of testing.
- 7.7 Testing frequency discussions in the guide are based on risk assessment and it is pointed out that older vehicles (which typically have less efficient brake systems) may require more frequent testing than more modern vehicles. Although un-powered vehicles are not specifically covered in the guide similar principles should apply.
- 7.8 The draft rules contradict this and similar advice.
- 7.9 Although this current discussion is dedicated to brake performance and inspection the same inspection protocols being discussed here apply equally to other agricultural vehicle safety systems.
- 7.10 **Queuing behind slow and/or overwidth vehicles**  
The overall purpose of the omnibus rule changes is to create a safer environment around agricultural vehicles operating on public roads. Impeded traffic flow is often created by slower agricultural vehicle speeds and over-dimensional characteristics. This in turn leads to poor decision making when attempting to overtake these vehicles.
- 7.11 Greater focus on 2.1(2)<sup>3</sup> of the Road User Rule by agricultural vehicle drivers is necessary to reduce incidence of traffic queuing around (most specifically behind) agricultural vehicles. We would expect enforcement personnel to become more pro-active in this area also.
- 7.12 It would be beneficial to create a policy for agricultural vehicle drivers to restrict queuing to a limited number of vehicles. We are well aware

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<sup>3</sup> 2.1(2) If a driver's speed, when driving, is such as to impede the normal and reasonable flow of traffic, that driver must, as soon as is reasonably practicable, move the vehicle as far as practicable to the left side of the roadway when this is necessary to allow following traffic to pass.

of the consideration that is often shown by agricultural vehicle drivers to other road users to limit queuing. Providing those drivers with a queuing limit would create much needed nationwide consistency.

7.13 A maximum queuing number of five vehicles would be acceptable. Once this limit is reached agricultural vehicle operators should be required to reduce vehicle speed and pull off the road safely to facilitate safe over taking manoeuvres.

7.14 The respective options of slowing down and pulling off the road should not be conducted in isolation of each other as doing so might not be conducive to facilitating safe overtaking movements.

#### **Pavement wear recovery**

7.15 Agricultural vehicles have been exempted road user charges by recent amendments to the road user charges act. Encouraging agricultural vehicles to operate on New Zealand's roads without recovering pavement consumption costs will have an adverse effect on road maintenance budgets.

7.16 This also presents the proposition that pavement consumption, as a result of agricultural activity, will be paid by other road users.

7.17 Dual purpose agricultural vehicles that are being operated on road for hire or reward should contribute to their share of pavement wear costs. It is not practicable to expect the same of dedicated agricultural vehicles. Those vehicles that are transporting or towing vehicles and loads that meet our suggestion earlier in (2.3 or 2.4) should contribute to pavement wear costs.

7.18 It should also be noted that consumption calculations are independent of speed. Regardless of whether a vehicle is capable of travelling above or below 40 kph forces applied to pavement surfaces remain the same.

- 7.19 The new RUC act makes no provision for time licences which makes agricultural vehicle road wear collection a difficult task.
- 7.20 The registration system for agricultural vehicles (agricultural trailers included) should be retained to enable pavement wear collection. The picture above demonstrates this need. The RUC act now imposes costs according to the weight band that a vehicle operates in. Similar weight bands could be applied to agricultural powered and non-powered vehicles.
- 7.21 Bands could be put in place to collect revenue for vehicles with mass capability:
- 3,500 kg – 10,000 kg
  - 10,001 kg – 20,000 kg
  - 20,001 kg and above
- 7.22 We estimate that the mass of the trailer shown is similar to that of similar sized truck drawn trailers. Our calculations are also that the mass on the front axle of the trailer exceeds the allowable maximum mass for its axle configuration. Even if mass limits were not being exceeded the trailer and load still impose pavement wear that must be compensated for.

## **Conclusion**

We are not convinced of the validity of the reasoning for amending some of the rules as proposed.

There are proposals in the Agricultural Vehicles Omnibus rule which will provide agricultural vehicle operators and employees with significant dispensations from existing vehicle and occupational compliance regimes.

The notion of amending compliance regimes to enable agricultural vehicles to be driven at higher speeds on the open road by inexperienced and fatigued drivers is egregious.

The suggestion to create a vehicle demarcation point around a notional (40 kph) speed limit displays a fundamental lack of understanding of vehicle dynamics. A viable alternative to the proposed speed limits would to introduce operating mass demarcations.

Doing so would be consistent with other current land transport policies.

Agricultural vehicles should be required to compensate for pavement wear. The licensing regime should be retained.

It will be necessary to recognise vehicles according to their design usage. It is sensible to differentiate between dedicated and non-dedicated (multi-function) agricultural vehicles.

Doing so would also provide the demarcation for vehicle inspection criteria rather than being based on speed capability.