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Traction Engines Rule  
Rules Team  
Land Transport New Zealand  
PO Box 2840  
WELLINGTON

### **TRACTION ENGINES (2008): Rule 63001**

Dear Sir/Madam,

Thank you for the opportunity to comment on the Traction Engines (2008) draft Rule.

The NZ Federation of Motoring Clubs (FOMC) represents over 100 member clubs catering for cars, motorcycles, trucks and military vehicles, tractors and traction engines, covering heritage and collectors vehicles spanning all years of production.

Proposal 1 in the overview recommends having traction engine pressure equipment tested and certified every two years instead of annually. As traction engines are only used a few times a year whereas an industrial boiler is often used daily or weekly, the FOMC are confident an inspection every two years will be more than adequate.

On page 9 of the overview, under Vehicles in Motion, it states that in most situations a traction engine will have 2 crew, however steam enthusiasts tell us it's not unusual for a traction engine or steam lorry (truck) to have only 1 operator, he or she should have the appropriate engine driver qualification and a Class 1 driver licence. Also on page 9 you propose that the person in charge of a stationary vehicle should be required to hold a full Class 1 driver licence – why? We are sure that retired railway engine drivers and boiler attendants could operate the stationary machine safely without a car licence.

Finally, on page 11 of the overview (Risk to land transport safety) you state the primary risk associated with traction engines is a boiler malfunction and explosion. You give an example in Ohio, USA and we also heard of an example in the UK. We have it on good authority that neither incident was equipment failure but in fact operator error.

Our answers to specific questions in the draft rule follow.

#### **Proposal 1**

Riveted boilers as fitted to traction engines and steam trains are quite different to modern welded industrial boilers. The authorities that have been testing them on behalf of the Maritime NZ, firms such as SGS and Lloyds understand the difference and test accordingly. The testing that is done now is more than adequate but if new authorities were to be appointed without knowledge of the existing tests or an understanding of riveted boilers problems could occur. We are not familiar with the Health & Safety in Employment (pressure equipment, cranes and passenger ropeways) regulations 1999 as mentioned in 6.1(1)(b) perhaps this specifies the

test requirement, if not perhaps it should be specified. We recommend consultation with the interested groups if required.

## **Proposal 2**

The FOMC recommends the driver of a traction engine, steam truck or steam lorry in motion should have a Class 1 (car) licence and a NZQA unit standard 21754, 21755 engine drivers qualification or equivalent. If a different person is steering they should have a valid driver licence of any class. There is absolutely no need for them to have NZQA unit standard 11157 or any other qualification. Driving and steering a traction engine has little in common with driving a car or a truck for that matter, but having a Class 1 driver licence or any licence is all that is required, it proves a knowledge of the road rules.

There is however no need for a person in charge of a stationary traction engine to hold a Class 1 licence, also there is no need for a steerer to have a unit qualification. We recommend the wording in the rules section be changed as follows:

### *3.1 Licence and qualifications*

There must at all times be a person in charge of a traction engine who has an approved engine driver qualification or steerer qualification.

### Section 4: Vehicle in Motion (delete 'or under power')

#### *4.1 Licence and qualifications*

When a traction engine is in motion:

- (a) the engine driver must hold a full New Zealand Class 1 driver licence and an approved engine driver qualification; and
- (b) the steerer must hold a full New Zealand Class 1 driver licence.

#### *4.2 Person under supervision*

delete (c).

Yours sincerely,

Andrew McClintock  
Submission Secretary  
NZ Federation of Motoring Clubs

***Representing the responsible special interest and heritage motoring enthusiast***