

# Consultation on the Maximum Speed limit for Tractors on Public Roads

IOSH response to the Department for Transport consultation



Submission

27.01.14



## Introduction

IOSH welcomes the opportunity to respond to this important consultation on the Department for Transport (DfT) proposal to revise the maximum speed limit of Tractors on Public Roads.

In compiling our response we circulated the above consultation to our members and to our Rural Industries Group. The IOSH Rural Industries Group covers agriculture, horticulture, forestry, fisheries, waterways, conservation, equine activities, rural estate management, visitor access to the countryside, rural recreation, and other businesses which get their income from the rural economy.

IOSH believes that both the consultations on the maximum speed limit of tractors on public roads and the maximum weight limit of agricultural trailers and combinations should have been presented in one consultation document as the two issues are interdependent. However, if the changes are to go ahead, and we raise a number of important precursors to this, we suggest it would be prudent to introduce one change first and assess its impact, before considering introducing the other. For example, safely introduce the increased weight, then, if no problems arise, consider increasing the speed limit.

The IOSH Rural Industries Group received a presentation based on an article in Farmers Weekly<sup>1</sup> from the British Agricultural and Garden Machinery Association (BAGMA). In this, they said 78% of 170 trailers tested as found on the farm with air braking systems in 2010/11, by BAGMA approved dealers, failed to achieve minimum braking performance of 45% for a commercial specification braking system and 10% of trailers tested had no brakes. In the presentation, the BAGMA also said 61% of 140 trailers tested as found on the farm with hydraulic braking systems in 2010/11, by BAGMA approved dealers, failed to achieve minimum braking performance of 25% required for agricultural specification and 24% of trailers tested had no brakes. These findings help inform our submission.

In the response that follows we provide an IOSH summary position; responses to the consultation questions; a reference; and an information page about IOSH.

## IOSH summary position

IOSH does not agree with the proposal to increase the maximum speed limit of tractors on the public roads without a robust procedure in place to ensure the adequate roadworthiness and proper maintenance of such equipment. Such a procedure should be compulsory and not voluntary. IOSH would also want a system in place to ensure that operators received training for the safe operation of such equipment on the public roads and an understanding of the effect on braking and control of such vehicles during different weather / road conditions including conducting basic roadworthiness checks.

## Response to consultation questions

### ***1. Option 1: Do nothing – this means not changing the speed limit of 20mph.***

IOSH believes the speed limit should not be changed and that more robust systems should be in place to check the roadworthiness of agricultural equipment and training improved to ensure the competency of drivers of agricultural equipment.

### ***2. Option 2: Increase the speed limit to 25mph (40km/h). This is currently the speed limit in some other EU countries.***

IOSH does not believe that the speed limit should be increased without a robust procedure in place to ensure the adequate roadworthiness and proper maintenance of such equipment. Such a procedure should be compulsory and not voluntary. IOSH would also want a system in place to ensure that operators received training for the safe operation of such equipment on the public roads and an understanding of the effect on braking and control of such vehicles during different weather/road conditions including basic roadworthiness checks.

### ***3. Would you suggest a different speed limit?***

IOSH believes the speed limit should not be changed until the recommendations made in our response to question 1 and 2 are addressed.

### ***4. Do you have any experience or expectations of the balance of savings and costs of different the different speed limits.***

IOSH believes that any balance of saving and cost should take into consideration the cost of accidents and fatalities caused by agricultural vehicles on the public road without the precautions mentioned in our response to questions 1 and 2.

### ***5. Please provide any evidence on the frequency or severity of collisions on public roads involving conventional tractors which can only be driven at 20mph or less because they do not comply with the necessary regulations to drive any quicker, and whether an increase in this restricted speed on these roads would have an effect on road safety and other road users.***

IOSH does not have evidence on the frequency or severity of collisions involving conventional tractors, but suggest the Police or insurers may be able to provide this. IOSH believes that there should be a compulsory process to verify the performance of braking systems of agricultural vehicles before any increase in speed is considered. Also, a training requirement to ensure the competence of those driving agricultural vehicles.

The IOSH Rural Industries Group received a presentation from the British Agricultural and Garden Machinery Association (BAGMA), which showed that 78% of 170 trailers tested as found on the farm with air braking systems in 2010/11, by BAGMA approved dealers, failed to achieve minimum braking performance of 45% for a commercial specification braking system and 10% of trailers tested had no brakes. In the presentation, the BAGMA also said 61% of 140 trailers tested as found on the farm with hydraulic braking systems in 2010/11, by BAGMA approved dealers, failed to achieve minimum braking performance of 25% required for agricultural specification and 24% of trailers tested had no brakes.

***6. Please provide any evidence on what effects if any the policy will have on road wear and tear and road maintenance requirements.***

IOSH does not have any comment on the wear and tear and road maintenance. We suggest data on this may be available from The Highways Agency or the Transport Research Laboratory.

***7. Do you think there will be a direct transition cost of implementation which government or the private sector will incur as a result of the change to the speed restriction? Please provide any evidence or figures you may have.***

IOSH is aware that a compulsory scheme to check the road worthiness of agricultural vehicles allowed on the public roads would have cost implications, but this should be balanced against the cost of road traffic accidents involving such vehicles.

***8. Please provide any evidence on the impact of this proposal on fuel consumption.***

IOSH does not have a comment on the effect on fuel consumption, but we would suggest that the tractor manufacturers would be in a position to provide such information.

***9. How do you think the proposals will impact on small firms?***

IOSH believes that roadworthiness testing could be incorporated into the maintenance scheduling and insurance requirements, similar to an MOT for other road users, which is a negligible fraction of the cost of running a vehicle used on the public road.

**10. *Do you think that an increased speed limit would lead to a shift from other modes of haulage into agricultural haulage?***

IOSH does not have a comment on this question.

**11. *Please provide any evidence you may have on the number of drivers of conventional tractors who fail to comply with the 20mph speed limit.***

IOSH does not have evidence on speed limit infringements, but please see our response to question 5 above.

**12. *Do you think that all of the potential costs and benefits of the policy options have been considered in the Impact Assessment? Please provide details if you think costs or benefits have not been included.***

IOSH believes that an impact assessment of the costs or benefits should include the cost of accidents involving agricultural vehicles on public roads.

**13. *Do you think there is any need to review the speeds that agricultural motor vehicles other than tractors (e.g. combine harvesters) are subject to? If so, please provide you suggestions or comments.***

IOSH believes that any agricultural vehicles used on the public roads should have compulsory road worthiness testing and competency training for drivers.

## **References**

1. Trailer Braking Special article provided by Farmers Weekly, issue March 30th 2012.

## About IOSH

Founded in 1945, the Institution of Occupational Safety and Health (IOSH) is the largest body for health and safety professionals in the world, with more than 43,000 members in over 100 countries, including over 13,000 Chartered Safety and Health Practitioners. Incorporated by Royal Charter, IOSH is a registered charity, and an ILO international NGO and CIS collaborating centre. The Institution is independent and regulates and steers the profession, maintaining standards and providing impartial, authoritative guidance on occupational safety and health issues. The IOSH vision is:

**“A world of work which is safe, healthy and sustainable”**

The Institution steers the profession, providing impartial, authoritative, free guidance. Regularly consulted by government and other bodies, IOSH is the founding member to UK, European and International professional body networks. IOSH has an active research and development fund and programme, helping develop the evidence-base for health and safety policy and practice. Summary and full reports are freely accessible from our website. IOSH publishes an international peer-reviewed journal of academic papers twice a year titled *Policy and practice in health and safety*. We have also developed a unique UK resource providing free access to a health and safety research database, as well other free on-line tools and guides, including award-winning websites for business start-ups and young people; an occupational health toolkit; and a risk management tool for small firms

IOSH has 33 **Branches** worldwide, including the Caribbean, Hong Kong, Isle of Man, Middle East, Oman, Qatar, the Republic of Ireland and Singapore, 17 special interest groups covering aviation and aerospace; communications and media; construction; consultancy; education; environment; fire risk management; food and drink; hazardous industries; healthcare; international; offshore; public services; railways; retail and distribution; rural industries; and sports grounds and events. IOSH members work at both strategic and operational levels across all employment sectors. IOSH accredited trainers deliver health and safety awareness training to all levels of the workforce from shop floor to managers and directors, through a professional training network of more than 1,600 organisations. We issue around 100,000 certificates per year.

For more about IOSH, our members and our work please visit our website at [www.iosh.co.uk](http://www.iosh.co.uk).

### **Please direct enquiries about this response to:**

Phil Bates, Senior Policy and Technical Advisor  
Alka Joshi, Administrator  
The Grange,  
Highfield Drive  
Wigston,  
Leicestershire  
LE18 1NN  
Tel: 0116 257 3100  
Email: [consultation@iosh.co.uk](mailto:consultation@iosh.co.uk)