

## Out of scope

**From:** Out of scope  
**Sent:** Monday, 3 October 2022 12:28 pm  
**To:** s 9(2)(a) s 9(2)(a)@tsvconsultants.co.nz  
**Subject:** Action Manufacturing DHB - Dental Trailers.

**Importance:** High

Hi s 9(2)(a)

Just following up to see how you are going with the work you were doing into the root cause analysis and possible solutions.

Not sure if you are aware of this. <https://www.rnz.co.nz/news/national/475814/health-nz-urges-vigilance-after-wheels-hurtle-off-school-mobile-dental-clinics>

Thank you

Ngā mihi / Kind regards

## Out of scope

### Manager Heavy Vehicle Certification

Te Roopu Waeture | Regulatory Services

Email: Out of scope [nzta.govt.nz](mailto:s 9(2)(a)@nzta.govt.nz)

Phone: s 9(2)(a)

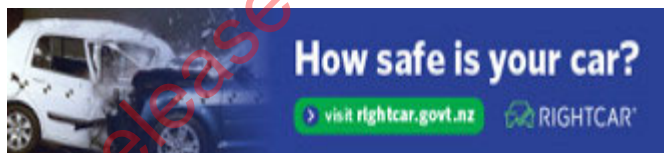
Mobile: s 9(2)(a)

### Waka Kotahi NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

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## Out of scope

**From:** Out of scope  
**Sent:** Monday, 16 January 2023 4:10 pm  
**To:** s 9(2)(a)  
**Cc:** s 9(2)(a)  
**Subject:** FW: Request for information on mobile dental trailers used by DHB's  
**Attachments:** LANDATA Details.xlsx

Hi s 9(2)(a)

Highlighted below. I acknowledge that I may have mis interpreted this and am happy to review as discussed.

Thank you

Ngā mihi / Kind regards

## Out of scope

### Manager Heavy Vehicle Certification

Te Roopu Waeture | Regulatory Services

Email: Out of scope [nzta.govt.nz](mailto:nzta.govt.nz)

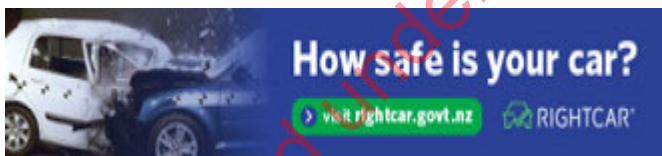
Phone: s 9(2)(a)

Mobile: s 9(2)(a)

**Waka Kotahi** NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade  
PO Box 973, Waikato Mail Centre, Hamilton 3240 New Zealand

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---

**From:** s 9(2)(a) s 9(2)(a) @actionmanufacturing.co.nz>  
**Sent:** Thursday, 24 June 2021 9:12 AM  
**To:** Out of scope <Out of scope@nzta.govt.nz>  
**Cc:** s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>  
**Subject:** RE: Request for information on mobile dental trailers used by DHB's

Good Morning s 9(2)(a)

Thank you for your email.

Firstly, can you please share with us, the details of the most recent complaint?

I have compiled a file of info, which it's easier to send a one-drive link.

In this file you will find:

- Sub folder – with all available component information
- 2390 Preliminary comment – s 9(2)(a) – Certifying Engineer – review of first incident.
- s 9(2)(b)(ii)
- s 9(2)(b)(ii)
- s 9(2)(b)(ii)
- Weight analysis relative to drawbar height
- s 9(2)(b)(ii)
- Landata details (also attached) - this was compiled last year, so the hubo readings, will have changed since.
- Summary document of the wheel and hub components and specs
- Dental trailer review – s 9(2)(a) (TSV Consultants)
- Wheel nut torque chart (supplied by CM Trailer Parts)

At the time of the last incident (2020) there was some correspondence with Waikato DHB, BOP DHB (including Lakes DHB) and Southern DHB which I will try to get my hands on.

To start with, I understand there have been two instances of wheel separating from trailer, understandably this has caused considerable concern.

- 2017 (Cromwell area)
- 2020 (Tauranga)

We share your concern, that there is regular maintenance required, and that mechanics are not following a torque requirement.

- This may be likely around the country, but locally our checks with service agents and the DHB's are correctly following the requirements. I have personally had several phone calls requesting the correct torque setting.

These axles and components have been supplied to us from BNT, as a dealer for CM Trailer Parts.

- General note – we had incredible difficulty gathering any technical (or any) information through BNT and CMTP, we found this incredibly frustrating and discouraging to be told that there is no technical information available. If this was a heavy trailer axle, this simply would not stand.
- The supplier has not been able to confirm to us, that these exacting rims have been purchased consistently, and the attached information, is to the absolute best of our understanding.

These axles are a heavy duty, light-trailer axle, that is they are supplied as hub assemblies, not as a completed axle, as a note, we no longer use these axles, and are eagerly awaiting our new axles coming from Australia as we speak, these are a rogers willex axle.

We have three main concerns with the way that these vehicles are operated:

1. Vehicles being towed outside of the specified coupling range.
  - We conducted an experiment with a Waikato DHB vehicle, which was in its full operational layout, to measure the axle loadings, when subjected to higher coupling positions.
  - We noted that the rear axle is subjected to considerably higher loadings, when the trailer elevation is increased. Additionally we noticed witness marks on the underside of the chassis, that shows the rocker had been bottoming out during the vehicles life, demonstrating an increase of rear axle load.
2. These vehicle are operated in tight locations, and are subjected to excessive lateral loading when being positioned and manoeuvred.
  - I have no doubt this caused damage to wheel studs, and cause them to lose tension
  - We have expressly discussed this with the DHB's
3. Regular maintenance and not adhering to torque settings
  - Regular tyre changing and brake maintenance due to frequency of use, as previously discussed.

As a result of the last incident, we were requested by Waikato DHB, to replace all the wheel studs, I have a couple of the studs/nuts removed that have been well and truly stripped of their thread, which I think you may have seen.

I wish to be clear, as this discussion topic has been thrown around a lot, these hubs are not designed to be hub centring, the hub spigot is not designed to take the load of the wheel. The rims themselves, are designed in such a way that is appropriate for a lug centered style hub – given the correct wheel nuts.

- These rims act as a type of spring washer
- This is incredibly common amongst trailers, if there is a problem with this type of hub-rim connection, then there is a problem amongst thousands of trailers on the road – without sounding overly dramatic.


I hope that info helps.

If you have any other questions or queries please don't hesitate to call, or come down if you would like 😊

I have copied in **s 9(2)(a)**, Action manufacturing **s 9(2)(a)**

I look forward to hearing from you soon.



---



**s 9(2)(a)**  
**s 9(2)(a)**

---

Action Manufacturing LP **s 9(2)(a)** DIRECT  
37 Kaimiro St, Te Rapa, 3200 **s 9(2)(a)** MOBILE  
PO Box 10168, Te Rapa, 3241  
Hamilton, New Zealand  
Member of the thl group [actionmanufacturing.co.nz](http://actionmanufacturing.co.nz)  
**YOUR AMBITION DRIVES US.**



---

From: **Out of scope** <**Out of scope** [nzta.govt.nz](mailto:nzta.govt.nz)>  
Sent: Wednesday, 23 June 2021 5:08 PM  
To: **s 9(2)(a)** **s 9(2)(a)** [@actionmanufacturing.co.nz](mailto:@actionmanufacturing.co.nz)>  
Subject: Request for information on mobile dental trailers used by DHB's

Hi **s 9(2)(a)**

Thanks for you time to talk on the phone earlier.

As discussed, can you please send me information re: mobile dental type trailers used by DHB's like the ones that had wheels separate from the hubs.

I would like information on

- The wheels used (ratings, specs, uses etc).
- The axles and hubs (ratings, specs, uses etc).
- A list of VIN's of trailers with the same fitted.

- Details of any investigations carried out by Action Manufacturing or independents as a result, into the cause of these incidents.
- Follow up advice to owners re wheel torque warnings and/or instructions.

Your cooperation is appreciated in this matter.  
Please don't hesitate to call should you want to discuss further.

Thank you

Ngā mihi / Kind regards

**Out of scope** / Manager Heavy Vehicle Certification

Te Roopu Waeture / Regulatory Group

DDI **s 9(2)(a)** / M **s 9(2)(a)**

E **Out of scope** [nzta.govt.nz](http://nzta.govt.nz) / w [nzta.govt.nz](http://nzta.govt.nz)

Waka Kotahi NZ Transport Agency

**Hamilton Office** / Level 1, Deloitte Building

24 Anzac Parade, PO Box 973, Hamilton 3240, New Zealand



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Production	Item number	Name	Serial number	Reference number	Last Inspection	Pass/Fail	Last Hubo Reading	As of Aug 2020
JOB013234	65002003	DUL2 1 Chair Tow #1 West Coast	SO15718 No1	P849F 7A8KG040209093407	8/10/2019	P		8524
JOB015359	65002003	DUL2 1 Chair Tow #2 West Coast	SO15718 No2	SO15718 P104M 7A8KG040209093409	11/02/2020	P		8302
JOB016174	65002003	DUL2,1chair Tow #3 Mid Central	093411	SO15859 P557S 7AT0KG02X09093411	16/09/2019	P		3562
JOB018753	65002003	DUL2,1chair Tow #4 Canterbury	093418	SO17045 Q347R 7AT0KG02X10103418	13/07/2020	P		5301
JOB020527	65002003	Dental Unit Level 2,1chair Tow #5 Canterbury	103421	SO17197 Q806U 7AT0KG02X10103421	8/06/2020	P		6620
JOB021985	65002003	Dental Unit Level 2,1chair Tow #6 Hawkes Bay	103429	SO17285 R469D 7AT0KG02X10103429	1/07/2020	P	1/07/2020 F	1262
JOB023129	65002003	Dental Unit Level 2-1 Chair Tow #7 Waikato	103430	SO17286 R552M 7AT0KG02X11103430	25/06/2020	P	23/06/2020 F	6332
JOB023828	65002003	Dental Unit Level 2-1 Chair Tow #8 Waikato	AMB005	SO17287 R58U 7AT0H900X11013706	5/02/2020	P	5/02/2020 F	4103
JOB025052	65002003	Dental Unit Level 2-1 Chair Tow #9 Waikato	AMB008	SO17288 S574A 7AT0H900X11347033	1/02/2020	P	29/01/2020 F	6869
JOB029039	65002003	Dental Unit Level 2-1 Chair Tow Whanganui #10	AMB0017	SO18372 S113U 7AT0H900X11845530	6/07/2020	P		3999 MSV010
JOB029344	65002003	Dental Unit Level 2-1 Chair Tow Wanganui #11	AMB021	SO18373 T251B 7AT0H900X11253942	6/07/2020	P		6248
JOB030470	65002003	Dental Unit Level 2-1 Chair Tow #12	MSV024	SO18374 T350J 7AT0H900X12958655	9/07/2020	P		1988
JOB031220	65002003	Dental Unit Level 2-1 Chair Tow #13	AMB026	SO18375 T806P 7AT0H900X12566260	15/04/2020	P		1793
JOB031808	65002003	Dental Unit Level 2-1 Chair Tow #14 MidCentral	AMB027	SO18376 T355Y 7AT0H900X12029707	1/10/2019	P		1859
JOB032361	65002003	Dental Unit Level 2-1 Chair Tow #15 Mid Central	AMB029	SO18377 U36F 7AT0H900X12837531	14/05/2020	P		1817
JOB032702	65002003	Dental Unit Level 2-1 Chair Tow #16 Southern	AMB030	SO19609 U498L 7AT0H900X12042723	19/12/2019	P	10/12/2019 F	2236
JOB032870	65002003	Dental Unit Level 2-1 Chair Tow # 17 Southern	AMB031	SO20051 U729P 7AT0H900X12677372	17/06/2020	P		2489
JOB033343	65002003	Dental Unit Level 2-1 Chair Tow #18 BOP	AMB032	SO20127 U842Y 7AT0H900X13371061	7/07/2020	F		1246
JOB033812	65002003	Dental Unit Level 2-1 Chair Tow #19 BOP	AMB033	SO20128 W672B 7AT0H900X13551232	10/07/2020	P		1749
JOB034361	65002003	Dental Unit Level 2-1 Chair Tow #20 Lakes DHB	AMB034	SO20129 W538G 7AT0H900X13149840	9/10/2019	P		1061
JOB034805	65002003	Dental Unit Level 2-1 Chair Tow #21 Lakes DHB	AMB035	SO20130				
JOB046133	65002008	Dental Unit Level 2-1 Chair Tow Midcentral DHB	AMH042	SO24883				
JOB060824	65002008	Dental Unit Level 2-1 Chair Tow Midcentral DHB	AMH047	SO28482 38T95 7AT0H900X19355056	31/01/2020	P		58

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Number	Build	Chassis	Ref	Product	Name	RegNo	VIN
	Purchased Chassis			65002003	DUL2 1 Chair Tow #1 West Coast		7A8K9040209093407
	Purchased Chassis			65002003	DUL2 1 Chair Tow #2 West Coast		7A8K9040209093409
	Purchased Chassis			65002003	DUL2,1chair Tow #3 Mid Central	P557S	
	Purchased Chassis			65002003	DUL2,1chair Tow #4 Canterbury		7AT0K902X10103418
	Purchased Chassis			65002003	Dental Unit Level 2,1chair Tow #5 Canterbury		7AT0K602X10103421
	Purchased Chassis			65002003	Dental Unit Level 2,1chair Tow #6 Hawkes Bay	R469D	
	Purchased Chassis			65002003	Dental Unit Level 2-1 Chair Tow #7 Waikato	R552M	
JOB023830	DHB Semi-trailer AMB chassis 7.3m #8	29006102	JOB023828	65002003	Dental Unit Level 2-1 Chair Tow #8 Waikato		7AT0H900X11012706
JOB025058	DHB Semi-trailer AMB chassis 7.3m #9	29006102	JOB025052	65002003	Dental Unit Level 2 1 Chair Tow #9 Waikato		7AT0H900X11347033
JOB029041	Simple Trailer AMB Chassis 7.3m 4600kg Whanganui #10	29006102	JOB029039	65002003	Dental Unit Level 2 1 Chair Tow Whanganui #10		7AT0H900X11845530
JOB029350	DHB Simple Trailer AMB Chassis 7.3m 4600kg Wanganui #11	29006102	JOB029344	65002003	Dental Unit Level 2-1 Chair Tow Wanganui #11	T251B	
JOB030472	DHB Simple Trailer AMB Chassis 7.3m 4600kg #12	29006102	JOB030470	65002003	Dental Unit Level 2-1 Chair Tow #12 (Canterbury)	T350J	
JOB031222	DHB Simple Trailer AMB Chassis 7.3m 4600kg #13	29006102	JOB031220	65002003	Dental Unit Level 2-1 Chair Tow #13 (Canterbury)	T806P	
JOB031810	DHB Simple Trailer AMB Chassis 7.3m 4600kg #14	29006102	JOB031808	65002003	Dental Unit Level 2-1 Chair Tow #14 MidCentral		
JOB032363	DHB Simple Trailer AMB Chassis 7.3m 4600kg #15 Mid Central	29006102	JOB032361	65002003	Dental Unit Level 2-1 Chair Tow #15 Mid Central		
JOB032704	DHB Simple Trailer AMB Chassis 7.3m 4600kg #16	29006102	JOB032702	65002003	Dental Unit Level 2-1 Chair Tow #16 Southern		
JOB032872	DHB Simple Trailer AMB Chassis 7.3m 4600kg #17	29006102	JOB032870	65002003	Dental Unit Level 2-1 Chair Tow # 17 Southern		
JOB033345	DHB Simple Trailer AMB Chassis 7.3m 4600kg #18 BOP	29006102	JOB033343	65002003	Dental Unit Level 2-1 Chair Tow #18 BOP		
JOB033815	DHB Simple Trailer AMB Chassis 7.3m 4600kg #19 BOP	29006102	JOB033812	65002003	Dental Unit Level 2-1 Chair Tow #19 BOP		
JOB034363	DHB Simple Trailer AMB Chassis 7.3m 4600kg #20 Lakes DHB	29006102	JOB034361	65002003	Dental Unit Level 2-1 Chair Tow #20 Lakes DHB		
JOB034807	DHB Simple Trailer AMB Chassis 7.3m 4600kg #21	29006102	JOB034805	65002003	Dental Unit Level 2-1 Chair Tow #21 Lakes DHB		
JOB046133	Dental Unit Level 2-1 Chair Tow Midcentral DHB	29006102	JOB046133	65002008	Dental Unit Level 2-1 Chair Tow Midcentral DHB		
	Dental Unit Level 2-1 Chair Tow Midcentral DHB	29006102	JOB060824	65002008	Dental Unit Level 2-1 Chair Tow Midcentral DHB		

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## Out of scope

**From:** s 9(2)(a) s 9(2)(a)@tsvconsultants.co.nz>  
**Sent:** Friday, 16 December 2022 3:15 pm  
**To:** s 9(2)(a)  
**Cc:** Out of scopes 9(2)(a)  
**Subject:** o

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Hi s 9(2)(a),

We have a solution for the Dental trailers which involves the following:

- Replace the wheel studs
- Fit a stepped spacer (to cover the hub recesses and provide an improved mating surface)
- Fit the thicker higher rated rim option (still stud centric but with far less flexibility)

The result of this based on our analysis improves the stud life from 2996kms to 409,000kms. Some failures occurred at around 1500kms, being 1/2 of what the analysis shows, but the relationship between the two should hold true. This would give the new design a life 205,000kms. I would recommend a stud replacement requirements far sooner, but these units wont get anywhere near this anyway.

I'll get the spacer detail to you shortly.

Regards,

s 9(2)(a) N.Z.C.E., B.E. Mech (Hons)

*Senior Engineer / Manager*

**TSV Consultants**

[www.tsvconsultants.co.nz](http://www.tsvconsultants.co.nz)

12A Albert St, Cambridge

Mobile s 9(2)(a)

Office s 9(2)(a) Ext s 9(2)(a)



## Out of scope

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**From:** Terry MedWorx (new) <medworx@xtra.co.nz>  
**Sent:** Monday, 7 November 2022 12:42 pm  
**To:** Out of scope  
**Subject:** Meeting with Terry - Medworx

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Hi [redacted],

Thank you for keeping me updated and my condolences for the events of the last few weeks.

When you are back at work can you let me know when we able to meet please, I can either come to Hamilton or you can come over to Tauranga.

Thanks,

**Terry Williams**

M: 027 3266 123 | P: 07 985 6280 | A: 182 Fraser Street, Tauranga | [www.medworx.co.nz](http://www.medworx.co.nz)

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# Out of scope

**From:** s 9(2)(a) s 9(2)(a) @actionmanufacturing.co.nz>  
**Sent:** Tuesday, 25 October 2022 6:34 am  
**To:** Out of scope  
**Cc:** s 9(2)(a)  
**Subject:** NZTA Report

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Good Morning s 9(2)(a)

Hope you had a great long weekend!

We will be making a response to the report this week, but we would like to discuss in person first.

Are you free at all wed/thurs?

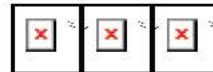
Thank you!

s 9(2)(a)  
s 9(2)(a)

M:+s 9(2)(a)



32 Kaimiro Street, Te Rapa, 3200  
PO Box 10168, Te Rapa, 3241  
Hamilton, New Zealand



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## Out of scope

**From:** Out of scope  
**Sent:** Monday, 3 October 2022 3:23 pm  
**To:** s 9(2)(a)  
**Cc:** s 9(2)(a)  
**Subject:** RE: Action Manufacturing DHB - Dental Trailers.

Hi s 9(2)(a)

Appreciate your response. Thanks for the update.

Thank you

Ngā mihi / Kind regards

## Out of scope

### Manager Heavy Vehicle Certification

Te Roopu Waeture | Regulatory Services

Email: Out of scope [nzta.govt.nz](mailto:nzta.govt.nz)

Phone: s 9(2)(a)

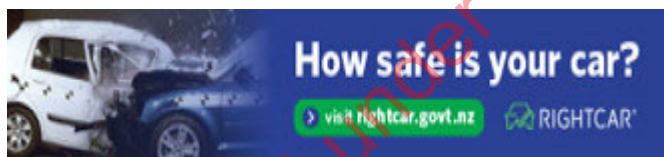
Mobile: s 9(2)(a)

**Waka Kotahi** NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

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**From:** s 9(2)(a) <s 9(2)(a)@tsvconsultants.co.nz>  
**Sent:** Monday, 3 October 2022 3:09 PM  
**To:** Out of scope <Out of scope@nzta.govt.nz>  
**Cc:** s 9(2)(a) <s 9(2)(a)@tsvconsultants.co.nz>  
**Subject:** RE: Action Manufacturing DHB - Dental Trailers.

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Hi Out of scope

Yes I was made aware of this although haven't listened to it yet. The chap who towed them around has been making a bit of noise about them. In his opinion its to heavy to use stud centric rims rather than hub centric. Most people think they are better because the center spigot takes the weight, but the don't, the bolt friction does. It just aids in the centering of the rims.

We are still working on it as its takes a bit of analysis power to get it to run through a full revolution on the wheel. Since hearing about RNZ we are trying a slightly simplified approach so we can get some answers quicker.

To this point we have been carrying the cost also so haven't been able to commit all we have to it, but as soon as we have something of substance, you'll be the first to know.

Regards,

s 9(2)(a)

---

**From:** Out of scope <Out of scope@nzta.govt.nz>

**Sent:** Monday, 3 October 2022 12:28 pm

**To:** s 9(2)(a) <s 9(2)(a)@tsvconsultants.co.nz>

**Subject:** Action Manufacturing DHB - Dental Trailers.

**Importance:** High

Hi s 9(2)(a)

Just following up to see how you are going with the work you were doing into the root cause analysis and possible solutions.

Not sure if you are aware of this. <https://www.rnz.co.nz/news/national/475814/health-nz-urges-vigilance-after-wheels-hurtle-off-school-mobile-dental-clinics>

Thank you

Ngā mihi / Kind regards

**Out of scope**

**Manager Heavy Vehicle Certification**

Te Roopu Waeture | Regulatory Services

Email: Out of scope@nzta.govt.nz

Phone: s 9(2)(a)

Mobile: s 9(2)(a)

**Waka Kotahi** NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

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**From:** s 9(2)(a) s 9(2)(a)@tsvconsultants.co.nz>  
**Sent:** Monday, 7 November 2022 6:02 pm  
**To:** Out of scope  
**Cc:** s 9(2)(a) s 9(2)(a)  
**Subject:** RE: Failure Investigation report

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Hi [redacted]

I had a meeting with Action Manufacturing where I was able to read the report in detail. Removing all the distractions around stuff largely irrelevant, (ie... s 9(2)(a) reuse of documentation as file content was abnormal ???), it comes down to the hub and rim compatibility rim, poor fitment of rims or a combination of both.

The comment around not having assessed the GVM robustly I think is unfair. These items were used at or within their max safe rating, and are a very low kms vehicle. A small allowance was made for additional equipment, but the trailer that the weight test was done on was 400kg heavier than its tare, more than could be reasonably expected. Even still this only brings it up to the max safe rating of the lowest rated component.

The report also uses information that Action and myself introduced as precautionary measures, unfairly. The height range came about as a result of the failures that occurred and testing we did to try and figure out what was going on. We heard that the units were being towed with excessively high coupling heights which combined with witness marks on the center rocker showing it had been bottoming out, figured some testing should be done to see if we could replicate this. Even with a 900mm coupling height the rocker rotation was not adequate to provide conclusive answers. Since we couldn't simulate dynamic loads we thought introducing the height range would remove this risk. This is also why it wasn't marked on the units as it was years after there build. It was relayed to the DHB however.

As your aware, we are currently doing an analysis of the rim and hub combination. What we are quite clearly seeing is that rim flex is inducing a fatigue load into the bolts. This is around 50% higher in the bolts at the hub slots, which reduces the stud life by a factor of 3 over the remaining bolts. Where it all gets really scary is when a side load is applied to the rim simulating cornering. This increases the rim flex considerably and therefore fatigue into the studs giving a very short life as was seen by the in service units.

Action Manufacturing are currently in contact with TRS rims about the supply of rims with a flat bolt face centre which will remove almost all of the fatigue component from the studs and should solve the issue. Action seems prepared to wear this cost even though I feel the fault in with the components.

The DHB have also been instructed that they can only trailer the units around until such time and this has been resolved.

s 9(2)(g)(i)

Regards,

s 9(2)(a) N.Z.C.E., B.E. Mech (Hons)

s 9(2)(a) / s 9(2)(a)

**TSV Consultants**

[www.tsvconsultants.co.nz](http://www.tsvconsultants.co.nz)

12A Albert St, Cambridge

Mobile s 9(2)(a)

Office s 9(2)(a) Ext s 9(2)(a)

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Out of scope

**From:** Out of scope  
**Sent:** Monday, 19 December 2022 1:53 pm  
**To:** s 9(2)(a)  
**Subject:** RE: Hub / Rim solution

Hi s 9(2)(a), s 9(2)(a)

Thanks for the update.

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Thank you

Ngā mihi / Kind regards

Out of scope

**Manager Heavy Vehicle Certification**

Te Roopu Waeture | Regulatory Services

Email: Out of scope [nzta.govt.nz](mailto:nzta.govt.nz)

Phone: s 9(2)(a)

Mobile: s 9(2)(a)

**Waka Kotahi** NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

[Facebook](#) | [Twitter](#) | [LinkedIn](#)



---

**From:** s 9(2)(a) s 9(2)(a) @actionmanufacturing.co.nz>  
**Sent:** Monday, 19 December 2022 11:04 AM  
**To:** s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>; s 9(2)(a) <s 9(2)(a)@tsvconsultants.co.nz>  
**Cc:** Out of scope <Out of scope@nzta.govt.nz>  
**Subject:** RE: Hub / Rim solution

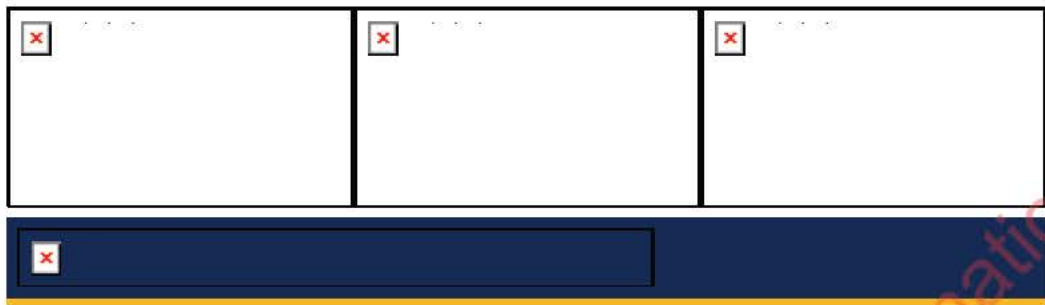
**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Good Morning s 9(2)(a) and Out of scope

Confirming that we have placed an order for all 21 vehicles worth of rims from Rogers Willex in Australia.

Thank you

s 9(2)(a)  
s 9(2)(a)  
M: s 9(2)(a)



32 Kaimiro Street, Te Rapa, 3200  
PO Box 10168, Te Rapa, 3241  
Hamilton, New Zealand



---

From: s 9(2)(a) <[s 9\(2\)\(a\)@actionmanufacturing.co.nz](mailto:s 9(2)(a)@actionmanufacturing.co.nz)>  
Sent: Monday, 19 December 2022 8:24 AM  
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Thanks for confirming s 9(2)(a)

We'll get the rims on order, and space into work as soon as the details are confirmed.

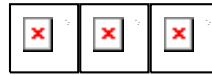
Kind Regards

s 9(2)(a)  
s 9(2)(a)  
T: s 9(2)(a)  
M: s 9(2)(a)





32 Kaimiro Street, Te Rapa, 3200  
PO Box 10168, Te Rapa, 3241  
Hamilton, New Zealand



---

**From:** s 9(2)(a) <s 9(2)(a)@tsvconsultants.co.nz>  
**Sent:** Friday, 16 December 2022 3:15 pm  
**To:** s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>  
**Cc:** Out of scope <Out of scope@nzt.govt.nz>; s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>  
**Subject:** Hub / Rim solution

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Regards,

s 9(2)(a) N.Z.C.E., B.E. Mech (Hons)

s 9(2)(a) / s 9(2)(a)

**TSV Consultants**

[www.tsvconsultants.co.nz](http://www.tsvconsultants.co.nz)

12A Albert St, Cambridge

Mobile s 9(2)(a)

Office s 9(2)(a) Ext s 9(2)(a)

# Out of scope

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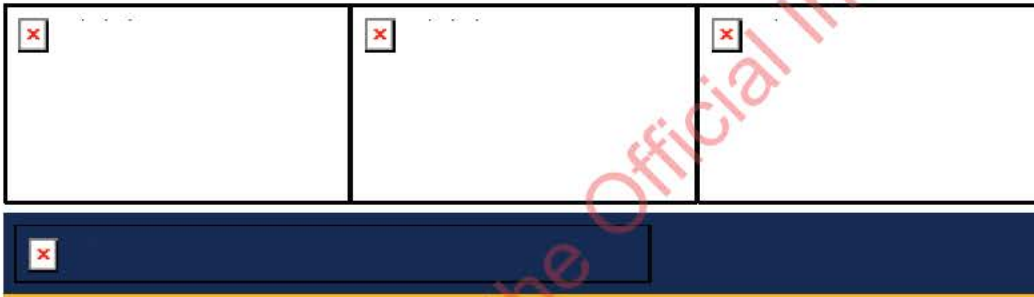
Thanks for confirming s 9(2)(a)

We'll get the rims on order, and space into work as soon as the details are confirmed.

Kind Regards

s 9(2)(a)  
s 9(2)(a)

T: s 9(2)(a)  
M: +s 9(2)(a)



32 Kaimiro Street, Te Rapa, 3200  
PO Box 10168, Te Rapa, 3241  
Hamilton, New Zealand



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**From:** s 9(2)(a) s 9(2)(a)@tsvconsultants.co.nz>  
**Sent:** Friday, 16 December 2022 3:15 pm  
**To:** s 9(2)(a) s 9(2)(a)@actionmanufacturing.co.nz>  
**Cc:** Out of scope <Out of scope nzta.govt.nz>; s 9(2)(a) s 9(2)(a)@actionmanufacturing.co.nz>  
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12A Albert St, Cambridge

Mobile s 9(2)(a)

Office s 9(2)(a) Ext s 9(2)(a)

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# Out of scope

**From:** s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>  
**Sent:** Tuesday, 20 December 2022 7:15 am  
**To:** Out of scope s 9(2)(a) s 9(2)(a)  
**Subject:** olution

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Morning s 9(2)(a)

We will be releasing some correspondence to NZ Health Partnerships today.

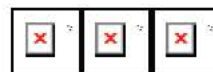
We expect the stock to arrive end of January, so we will send the components out to the DHB's as soon as possible, likely early February. I will keep you in the loop with delivery dates etc.

Thank you

s 9(2)(a)  
s 9(2)(a)  
M: +s 9(2)(a)



32 Kaimiro Street, Te Rapa, 3200  
PO Box 10168, Te Rapa, 3241  
Hamilton, New Zealand



---

**From:** Out of scope <Out of scope@nzta.govt.nz>  
**Sent:** Monday, 19 December 2022 1:53 PM  
**To:** s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>; s 9(2)(a) s 9(2)(a)@actionmanufacturing.co.nz; s 9(2)(a) <s 9(2)(a)@tsvconsultants.co.nz>  
**Subject:** RE: Hub / Rim solution

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Ngā mihi / Kind regards

## Out of scope

### Manager Heavy Vehicle Certification

Te Roopu Waeture | Regulatory Services

Email: **Out of scope** [nzta.govt.nz](mailto:outofscope@nzta.govt.nz)

Phone: **s 9(2)(a)**

Mobile: **s 9(2)(a)**

### Waka Kotahi NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

[Facebook](#) | [Twitter](#) | [LinkedIn](#)



From: **s 9(2)(a)** <**s 9(2)(a)** [@actionmanufacturing.co.nz](mailto:s9(2)(a)@actionmanufacturing.co.nz)>

Sent: Monday, 19 December 2022 11:04 AM

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Cc: **Out of scope** <**Out of scope** [@nzta.govt.nz](mailto:outofscope@nzta.govt.nz)>

Subject: RE: Hub / Rim solution

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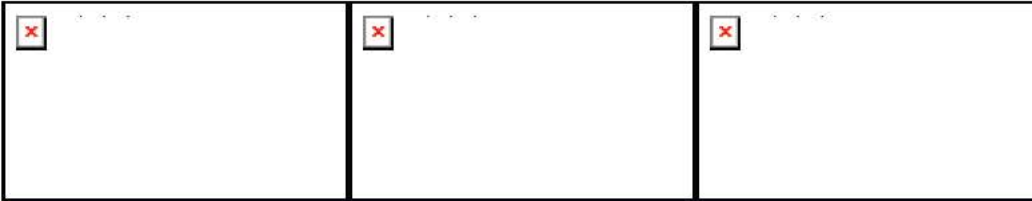
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**s 9(2)(a)**  
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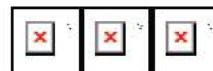
Kind Regards

s 9(2)(a)  
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T: s 9(2)(a)  
M: +s 9(2)(a)



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From: s 9(2)(a) <s 9(2)(a)@tsvconsultants.co.nz>  
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# Out of scope

**From:** s 9(2)(a) s 9(2)(a) @actionmanufacturing.co.nz>  
**Sent:** Wednesday, 21 December 2022 7:21 am  
**To:** Out of scope s 9(2)(a); s 9(2)(a)  
**Subject:** RE: Hub / Rim solution  
**Attachments:** Dental Unit Investigation Response 20.12.22.pdf

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Good Morning <sup>Out of scope</sup>

Hope you are doing well, in the last week!

Please find attached our feedback to NZTA and our offer of rectification!

If you have any questions or queries please let us know.

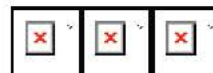
We would love to see a copy of your final report when you have it available also.

Thank you very much, talk soon

s 9(2)(a)  
s 9(2)(a)  
M:+s 9(2)(a)



32 Kaimiro Street, Te Rapa, 3200  
PO Box 10168, Te Rapa, 3241  
Hamilton New Zealand



---

**From:** Out of scope <Out of scope nzta.govt.nz>  
**Sent:** Monday, 19 December 2022 1:53 PM  
**To:** s 9(2)(a) s 9(2)(a) @actionmanufacturing.co.nz>; s 9(2)(a) s 9(2)(a) @actionmanufacturing.co.nz>; s 9(2)(a) s 9(2)(a) @tsvconsultants.co.nz>  
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## Out of scope

### Manager Heavy Vehicle Certification

Te Roopu Waeture | Regulatory Services

Email: **Out of scope** [nzta.govt.nz](mailto:outofscope@nzta.govt.nz)

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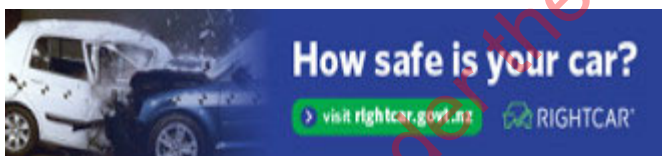
Mobile: **s 9(2)(a)**

### Waka Kotahi NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

[Facebook](#) | [Twitter](#) | [LinkedIn](#)



From: **s 9(2)(a)** <**s 9(2)(a)** [@actionmanufacturing.co.nz](mailto:s92a@actionmanufacturing.co.nz)>

Sent: Monday, 19 December 2022 11:04 AM

To: **s 9(2)(a)** <**s 9(2)(a)** [@actionmanufacturing.co.nz](mailto:s92a@actionmanufacturing.co.nz)>; **s 9(2)(a)** <**s 9(2)(a)** [@tsvconsultants.co.nz](mailto:s92a@tsvconsultants.co.nz)>

Cc: **Out of scope** **Out of scope** [@nzta.govt.nz](mailto:outofscope@nzta.govt.nz)>

Subject: RE: Hub / Rim solution

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s 9(2)(a)  
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T: s 9(2)(a)  
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32 Kaimiro Street, Te Rapa, 3200  
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 Hamilton, New Zealand



From: s 9(2)(a) <s 9(2)(a)@tsvconsultants.co.nz>  
 Sent: Friday, 16 December 2022 3:15 pm  
 To: s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>

Cc: Out of scope <Out of scope [redacted] nztta.govt.nz>; s 9(2)(a) <s 9(2)(a) [redacted] @actionmanufacturing.co.nz>  
Subject: Hub / Rim solution

Hi [redacted],

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s 9(2)(a) [redacted] / s 9(2)(a) [redacted]

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12A Albert St, Cambridge

Mobile s 9(2)(a) [redacted]

Office s 9(2)(a) [redacted] Ext s 9(2)(a) [redacted]

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20 December 2022

NZ Health Partnerships – Hono Oranga Aotearoa  
Te Whatu Ora – Health New Zealand

**Action Manufacturing LP**  
37 Kaimiro St, Te Rapa, 3200  
PO Box 10168, Te Rapa, 3241  
Hamilton, New Zealand  
+64 7 850 2410 PHONE  
[actionmanufacturing.co.nz](http://actionmanufacturing.co.nz)

Without Prejudice: NZ Health Partnerships/Te Whatu Ora

Dear s 9(2)(a)

In relation to the safety notice issued 27<sup>th</sup> September 2022, we have completed an extensive investigation of your Mobile Dental Unit Trailers particularly the DUL2T1 as agreed which has involved NZTA and TSV. We are satisfied with the independent recommendations and that the following design enhancements will extend the safe operating lifecycle of the components in question to over 200,000km.

During the investigation, multiple contributing factors were identified, and reviewed. The final agreed solution involves.

- Replacing all existing wheel studs
- Fitting a specifically designed hub spacer (to eliminate the void)
- Supply of new heavier duty steel rims (existing tyres will need to be transferred)

Action has sourced heavier duty rims from an alternative supplier, as we were not satisfied with the existing suppliers' responses and will supply these along with the spaces at its cost even though the vehicles are well outside of their manufacturer's warranty period. Action Manufacturing will also supply all the necessary procedure documents affected vehicles, for customers to fit at their expense.

We are looking to roll out this solution early in the new year once we have confirmed shipping dates of items from Australia.

Please note, this does not mitigate the ongoing responsibility of the owner to ensure the trailers are serviced and maintained to the manufacturer's guidelines. We will be supplying a maintenance document to accompany the vehicle to any service agents for future works to ensure procedures are adhered to accurately.

We thank you for your patience and cooperation and allowing the matter to take the proper course, NZTA will be releasing their findings in the next few days also.

Please respond (to this without prejudice offer) in writing by 11:00am on Friday 23<sup>rd</sup> Dec 2023.

If you have any questions, please do not hesitate to contact us directly.

s 9(2)(a)

s 9(2)(a), Action Manufacturing s 9(2)(a)

# Out of scope

**From:** s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>  
**Sent:** Tuesday, 25 October 2022 3:15 pm  
**To:** Out of scope  
**Cc:** s 9(2)(a)  
**Subject:** RE: NZTA Report

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Hi 

s 9(2)(a)

Talking internally, we would actually prefer to talk with yourself, mainly as we want to discuss the report structure.

We are happy to wait until next week.

Talk to you soon!

Take care

s 9(2)(a)  
s 9(2)(a)

M: +s 9(2)(a)



32 Kaimiro Street, Te Rapa, 3200  
PO Box 10168, Te Rapa, 3241  
Hamilton, New Zealand




---

**From:** Out of scope <Out of scope@nzta.govt.nz>  
**Sent:** Tuesday, 25 October 2022 6:57 AM  
**To:** s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>  
**Cc:** s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>; Out of scope <Out of scope@nzta.govt.nz>  
**Subject:** RE: NZTA Report

Hi 

s 9(2)(a)

Can you please make contact with  to discuss.

Thank you

Ngā mihi / Kind regards

## Out of scope

### Manager Heavy Vehicle Certification

Te Roopu Waeture | Regulatory Services

Email: [Out of scope@nzta.govt.nz](mailto:Out of scope@nzta.govt.nz)

Phone: s 9(2)(a)

Mobile: s 9(2)(a)

### Waka Kotahi NZ Transport Agency

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PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

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From: s 9(2)(a) s 9(2)(a) <[s 9\(2\)\(a\)@actionmanufacturing.co.nz](mailto:s 9(2)(a)@actionmanufacturing.co.nz)>  
Sent: Tuesday, 25 October 2022 6:34 AM  
To: [Out of scope@nzta.govt.nz](mailto:Out of scope@nzta.govt.nz) <Out of scope@nzta.govt.nz>  
Cc: s 9(2)(a) s 9(2)(a) <[s 9\(2\)\(a\)@actionmanufacturing.co.nz](mailto:s 9(2)(a)@actionmanufacturing.co.nz)>  
Subject: NZTA Report

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Good Morning s 9(2)(a)

Hope you had a great long weekend!

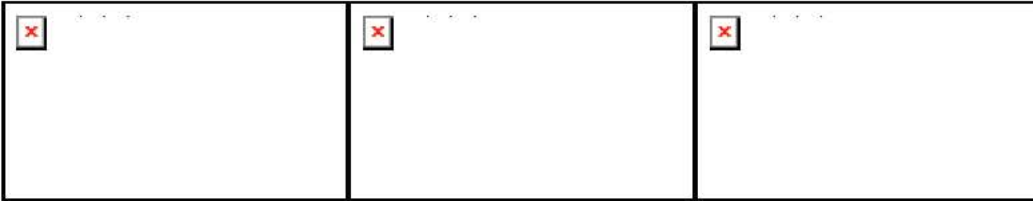
We will be making a response to the report this week, but we would like to discuss in person first.

Are you free at all wed/thurs?

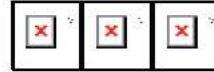
Thank you!

s 9(2)(a)  
s 9(2)(a)

M: +s 9(2)(a)



32 Kaimiro Street, Te Rapa, 3200  
PO Box 10168, Te Rapa, 3241  
Hamilton, New Zealand



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Released under the Official Information Act 1982

Out of scope

**From:** s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>  
**Sent:** Tuesday, 17 January 2023 6:47 am  
**To:** Out of scope s 9(2)(a)  
**Subject:** RE: Request for information on mobile dental trailers used by DHB's

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Thanks [redacted]

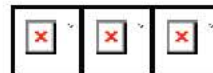
Good to get that clarified.

Kind Regards

s 9(2)(a)  
s 9(2)(a)  
T: s 9(2)(a)  
M: +s 9(2)(a)



32 Kaimiro Street, Te Rapa, 3200  
PO Box 10168, Te Rapa, 3241  
Hamilton, New Zealand



**From:** Out of scope <Out of scope@nzta.govt.nz>  
**Sent:** Monday, 16 January 2023 4:10 pm  
**To:** s 9(2)(a) s 9(2)(a)@actionmanufacturing.co.nz  
**Cc:** s 9(2)(a) s 9(2)(a)@actionmanufacturing.co.nz  
**Subject:** FW: Request for information on mobile dental trailers used by DHB's

Hi [redacted]

Highlighted below. I acknowledge that I may have mis interpreted this and am happy to review as discussed.

Thank you

Ngā mihi / Kind regards

Out of scope

Manager Heavy Vehicle Certification



Te Roopu Waeture | Regulatory Services

Email: **Out of scope** [nzta.govt.nz](mailto:nzta.govt.nz)

Phone: **s 9(2)(a)**

Mobile: **s 9(2)(a)**

Waka Kotahi NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

[Facebook](#) | [Twitter](#) | [LinkedIn](#)



From: **s 9(2)(a)** **s 9(2)(a)** [<@actionmanufacturing.co.nz>](mailto:@actionmanufacturing.co.nz)  
Sent: Thursday, 24 June 2021 9:12 AM  
To: **Out of scope** [<Out of scope@nzta.govt.nz>](mailto:Out of scope@nzta.govt.nz)  
Cc: **s 9(2)(a)** **s 9(2)(a)** [<@actionmanufacturing.co.nz>](mailto:@actionmanufacturing.co.nz)  
Subject: RE: Request for information on mobile dental trailers used by DHB's

Good Morning **s 9(2)(a)**

Thank you for your email.

Firstly, can you please share with us, the details of the most recent complaint?

I have compiled a file of info, which it's easier to send a one-drive link.

**Link to documents provided to you in OIA-11264 - pages 8-37 of attachment 1**

In this file you will find:

- Sub folder – with all available component information
- 2390 Preliminary comment – **s 9(2)(a)** – Certifying Engineer – review of first incident.
- **s 9(2)(b)(ii)**
- **s 9(2)(b)(ii)**
- **s 9(2)(b)(ii)**
- Weight analysis relative to drawbar height
- **s 9(2)(b)(ii)**
- Landata details (also attached) - this was compiled last year, so the hubo readings, will have changed since.
- Summary document of the wheel and hub components and specs
- Dental trailer review – **s 9(2)(a)** (TSV Consultants)
- Wheel nut torque chart (supplied by CM Trailer Parts)

At the time of the last incident (2020) there was some correspondence with Waikato DHB, BOP DHB (including Lakes DHB) and Southern DHB which I will try to get my hands on.

To start with, I understand there have been two instances of wheel separating from trailer, understandably this has caused considerable concern.

- 2017 (Cromwell area)
- 2020 (Tauranga)

We share your concern, that there is regular maintenance required, and that mechanics are not following a torque requirement.

- This may be likely around the country, but locally our checks with service agents and the DHB's are correctly following the requirements. I have personally had several phone calls requesting the correct torque setting.

These axles and components have been supplied to us from BNT, as a dealer for CM Trailer Parts.

- General note – we had incredible difficulty gathering any technical (or any) information through BNT and CMT, we found this incredibly frustrating and discouraging to be told that there is no technical information available. If this was a heavy trailer axle, this simply would not stand.
- The supplier has not been able to confirm to us, that these exacting rims have been purchased consistently, and the attached information, is to the absolute best of our understanding.

These axles are a heavy duty, light-trailer axle, **that is they are supplied as hub assemblies not as a completed axle**, as a note, we no longer use these axles, and are eagerly awaiting our new axles coming from Australia as we speak, these are a rogers willex axle.

We have three main concerns with the way that these vehicles are operated:

1. Vehicles being towed outside of the specified coupling range.
  - We conducted an experiment with a Waikato DHB vehicle, which was in its full operational layout, to measure the axle loadings, when subjected to higher coupling positions.
  - We noted that the rear axle is subjected to considerably higher loadings, when the trailer elevation is increased. Additionally we noticed witness marks on the underside of the chassis, that shows the rocker had been bottoming out during the vehicles life, demonstrating an increase of rear axle load.
2. These vehicle are operated in tight locations, and are subjected to excessive lateral loading when being positioned and manoeuvred.
  - I have no doubt this caused damage to wheel studs, and cause them to lose tension
  - We have expressly discussed this with the DHB's
3. Regular maintenance and not adhering to torque settings
  - Regular tyre changing and brake maintenance due to frequency of use, as previously discussed.

As a result of the last incident, we were requested by Waikato DHB, to replace all the wheel studs, I have a couple of the studs/nuts removed that have been well and truly stripped of their thread, which I think you may have seen.

I wish to be clear, as this discussion topic has been thrown around a lot, these hubs are not designed to be hub centring, the hub spigot is not designed to take the load of the wheel. The rims themselves, are designed in such a way that is appropriate for a lug centered style hub – given the correct wheel nuts.

- These rims act as a type of spring washer
- This is incredibly common amongst trailers, if there is a problem with this type of hub-rim connection, then there is a problem amongst thousands of trailers on the road – without sounding overly dramatic.

I hope that info helps.

If you have any other questions or queries please don't hesitate to call, or come down if you would like ☺

I have copied in **s 9(2)(a)**, Action manufacturing **s 9(2)(a)**

I look forward to hearing from you soon.

[Redacted]	[Redacted]		
[Redacted]			
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]		[Redacted]	
[Redacted]	[Redacted]		[Redacted]

From: Out of scope <Out of scope@nzta.govt.nz>  
 Sent: Wednesday, 23 June 2021 5:08 PM  
 To: s 9(2)(a) s 9(2)(a) @actionmanufacturing.co.nz>  
 Subject: Request for information on mobile dental trailers used by DHB's

Hi [Redacted]

Thanks for you time to talk on the phone earlier.

As discussed, can you please send me information re: mobile dental type trailers used by DHB's like the ones that had wheels separate from the hubs.

I would like information on

- The wheels used (ratings, specs, uses etc).
- The axles and hubs (ratings, specs, uses etc).
- A list of VIN's of trailers with the same fitted.
- Details of any investigations carried out by Action Manufacturing or independents as a result, into the cause of these incidents.
- Follow up advice to owners re wheel torque warnings and/or instructions.

Your cooperation is appreciated in this matter.  
 Please don't hesitate to call should you want to discuss further.

Thank you

Ngā mihi / Kind regards

Out of scope / Manager Heavy Vehicle Certification  
 Te Roopu Waeture / Regulatory Group

DDI s 9(2)(a) / M s 9(2)(a)  
 E Out of scope @nzta.govt.nz / w nzta.govt.nz

Waka Kotahi NZ Transport Agency  
 Hamilton Office / Level 1, Deloitte Building  
 24 Anzac Parade, PO Box 973, Hamilton 3240, New Zealand



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Released under the Official Information Act 1982

# Out of scope

**From:** s 9(2)(a) <s 9(2)(a)@actionmanufacturing.co.nz>  
**Sent:** Tuesday, 17 January 2023 6:49 am  
**To:** Out of scope  
**Cc:** s 9(2)(a)  
**Subject:** RE: Request for information on mobile dental trailers used by DHB's

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Good Morning s 9(2)(a)

Thank you for sending that through.

We appreciate your help, and look forward to putting this issue to rest.

Have a good day.

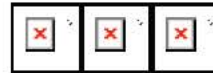
Talk soon

s 9(2)(a)  
s 9(2)(a)

M: +s 9(2)(a)



32 Kaimiro Street, Te Rapa, 3200  
PO Box 10168, Te Rapa, 3241  
Hamilton, New Zealand



---

**From:** Out of scope <Out of scope@nzta.govt.nz>  
**Sent:** Monday, 16 January 2023 4:10 PM  
**To:** s 9(2)(a) s 9(2)(a)@actionmanufacturing.co.nz>  
**Cc:** s 9(2)(a) s 9(2)(a)@actionmanufacturing.co.nz>  
**Subject:** FW: Request for information on mobile dental trailers used by DHB's

Hi s 9(2)(a)

Highlighted below. I acknowledge that I may have mis interpreted this and am happy to review as discussed.

Thank you

Ngā mihi / Kind regards

## Out of scope

### Manager Heavy Vehicle Certification

Te Roopu Waeture | Regulatory Services

Email: **Out of scope** [nzta.govt.nz](mailto:nzta.govt.nz)

Phone: **s 9(2)(a)**

Mobile: **s 9(2)(a)**

**Waka Kotahi** NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

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---

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**Sent:** Thursday, 24 June 2021 9:12 AM  
**To:** **Out of scope** <**Out of scope** [nzta.govt.nz](mailto:nzta.govt.nz)>  
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I look forward to hearing from you soon.

[Redacted]		[Redacted]
[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]
[Redacted]		[Redacted]

**From:** **Out of scope** <**Out of scope** nza.govt.nz>  
**Sent:** Wednesday, 23 June 2021 5:08 PM

**To:** **s 9(2)(a)** **s 9(2)(a)** <[actionmanufacturing.co.nz](mailto:actionmanufacturing.co.nz)>

**Subject:** Request for information on mobile dental trailers used by DHB's

Hi!

Thanks for you time to talk on the phone earlier.

As discussed, can you please send me information re: mobile dental type trailers used by DHB's like the ones that had wheels separate from the hubs. I would like information on

- The wheels used (ratings, specs, uses etc).
- The axles and hubs (ratings, specs, uses etc).
- A list of VIN's of trailers with the same fitted.
- Details of any investigations carried out by Action Manufacturing or independents as a result, into the cause of these incidents.
- Follow up advice to owners re wheel torque warnings and/or instructions.

Your cooperation is appreciated in this matter.

Please don't hesitate to call should you want to discuss further.

Thank you

Nga mihi / Kind regards

**Out of scope** / Manager Heavy Vehicle Certification

Te Roopu Waeture / Regulatory Group

**DI S 9(2)(a)** / **M S 9(2)(a)**

**Out of scope** nza.govt.nz / [nza.govt.nz](http://nza.govt.nz)

Waka Kotahi NZ Transport Agency





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Out of scope

**From:** Out of scope  
**Sent:** Tuesday, 25 October 2022 7:28 am  
**To:** 'Terry MedWorx (new)'; Out of scope  
**Cc:** Out of scope  
**Subject:** RE: Wheel Detachments - Te WHatu Ora Safety Alert Release

Hi Terry

s 9(2)(a)

I will be in contact when I return to the office.

I appreciate your understanding.

Thank you

Ngā mihi / Kind regards

Out of scope

**Manager Heavy Vehicle Certification**

Te Roopu Waeture | Regulatory Services

Email: Out of scope [nzta.govt.nz](mailto:nzta.govt.nz)

Phone: s 9(2)(a)

Mobile: s 9(2)(a)

**Waka Kotahi** NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

[Facebook](#) | [Twitter](#) | [LinkedIn](#)



**From:** Out of scope  
**Sent:** Friday, 21 October 2022 8:03 AM  
**To:** Terry MedWorx (new) <medworx@xtra.co.nz>; Out of scope Out of scope @nzta.govt.nz>  
**Cc:** Out of scope Out of scope @nzta.govt.nz>  
**Subject:** RE: Wheel Detachments - Te WHatu Ora Safety Alert Release

Hi Terry

I am not going to be able to make contact today to arrange meeting.

s 9(2)(a)

I will be in contact with you next week.

I appreciate your understanding.

Thank you

Ngā mihi / Kind regards

## Out of scope

### Manager Heavy Vehicle Certification

Te Roopu Waeture | Regulatory Services

Email: **Out of scope** [nzta.govt.nz](mailto:outofscope@nzta.govt.nz)

Phone: **s 9(2)(a)**

Mobile: **s 9(2)(a)**

**Waka Kotahi** NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

[Facebook](#) | [Twitter](#) | [LinkedIn](#)



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**From:** **Out of scope** <**Out of scope** [nzta.govt.nz](mailto:outofscope@nzta.govt.nz)>  
**Sent:** Tuesday, 18 October 2022 3:56 PM  
**To:** Terry MedWorx (new) <[medworx@xtra.co.nz](mailto:medworx@xtra.co.nz)>; **Out of scope** <**Out of scope** [@nzta.govt.nz](mailto:outofscope@nzta.govt.nz)>  
**Cc:** **Out of scope** **Out of scope** [@nzta.govt.nz](mailto:outofscope@nzta.govt.nz)>  
**Subject:** Re: Wheel Detachments - Te WHatu Ora Safety Alert Release

Hi Terry

I am back in the office on Friday.  
I will make contact then to arrange a catch up.

Thank you

**Out of scope**

Get [Outlook for Android](#)

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**From:** Terry MedWorx (new) <[medworx@xtra.co.nz](mailto:medworx@xtra.co.nz)>  
**Sent:** Monday, October 17, 2022 11:10:14 AM  
**To:** **Out of scope** <**Out of scope** [nzta.govt.nz](mailto:outofscope@nzta.govt.nz)>; **Out of scope** <**Out of scope** [@nzta.govt.nz](mailto:outofscope@nzta.govt.nz)>  
**Cc:** **Out of scope** **Out of scope** [@nzta.govt.nz](mailto:outofscope@nzta.govt.nz)>  
**Subject:** Wheel Detachments - Te WHatu Ora Safety Alert Release

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Good morning **Out of scope** and **Out of scope**

I am aware of the recent NZTA media statement in regards to the wheel detachments that has been quoted both in news broadcasts and published on line by Radio New Zealand.

The clear implication is that the transport operators (me !) 'may have' been largely if not solely responsible for these wheel detachments, yet NZTA provided not one statement of proof of these allegations.

Using the word '*may have*' does not absolve NZTA from the associated implications.

Attached is the most recent Te Whatu Ora Health New Zealand Safety Alert dated 27/09/2022. This is the latest of many safety alerts published since the first detachment in 2017. Te Whatu Ora is clearly focussing on the engineering aspects of the design, not the transport operators. They raise no concerns about the actions of the transport operators and include statements such as:

**" Enquires and subsequent incident investigations concluded that the incorrect wheel assemble was attached to the hub resulting in the sheering of the wheel studs while being towed, leading to the wheel coming adrift from the MDU trailer "**

**And:**

**" NZTA & NZ Police were both notified, and the Police conducted an assessment of the wheel assembly and concluded there was a "design issue". However, the original manufacturer refutes there is a design issue and rather cites a towing operator error. This hypothesis has been refuted by several engineering reports and the NZ Police report. "**

This is a public document and Te Whatu Ora Health New Zealand released Action Manufacturing's name.

There is a Facebook group "**Unofficial NZ WoF/CoF Standard Advice Group**" It has 3,200 member and the majority of members are NZTA WoF/CoF Inspectors, NZTA certifiers, engineers and mechanics. I have published extensively on this forum, in most parts I have redacted personal details.

I am not even a mechanic, I walked into a lions den of engineering expertise. This forum has proven to be the ultimate peer review, 3,200 potential engineering specialists reviewing a mere transport operators description of a complex engineering situation.

Without exception everyone is in agreement that this is an engineering and manufacturing situation and that the transport operator had nothing to do with these detachments.

Topics covered include technical discussions on the rims and hubs, in-depth technical detail on wheel torque, etc, it is interesting that the recommended nut torques on these wheels are the same torque as almost every domestic car. There are technical explanations as to why only 2 out of 23 trailers have so far suffered detachments, the answer as you can see in the forum is because of 'chewing gum'.

I invite anyone from NZTA to at least temporarily join this group, there is a substantial amount of technical information, like all groups you remain anonymous unless you post something.

NZTA's comment that the detachments "**may have been impacted by other contributing factors, including.... how the vehicle is maneuvered into location**" is without foundation and as someone who takes moving these clinics seriously, I cannot be anything but offended.

I have moved 25 mobile clinics for over 12 years, we undertake 100-120 clinic moves per year, that is over 1,200 mobile clinic moves, we have never once incurred any damage to these clinics. Maybe other operators do ?, we don't, and if you review the forum, you'll see a detailed description of exactly why we don't damage these units.

Action Manufacturing are aware of the Facebook Forum and have asked me to delete it, this is the email from [redacted], AMB s 9(2)(a), you will note even [redacted] says " a supplier/component issue has been recorded as the issue."

[redacted] is a gentleman, I communicate with him on other matters, I have not (yet) posted a redacted copy of his email on Facebook as I do not want to compromise his employment.

----- Original Message -----

From: s 9(2)(a) s 9(2)(a) <[s 9\(2\)\(a\) s 9\(2\)\(a\)@actionmanufacturing.co.nz](mailto:s 9(2)(a) s 9(2)(a)@actionmanufacturing.co.nz)>  
To: "Terry MedWorx (new)" <[medworx@xtra.co.nz](mailto:medworx@xtra.co.nz)>  
CC: s 9(2)(a) s 9(2)(a) <[s 9\(2\)\(a\) s 9\(2\)\(a\)@actionmanufacturing.co.nz](mailto:s 9(2)(a) s 9(2)(a)@actionmanufacturing.co.nz)>  
Date: 06/09/2022 1:34 PM  
Subject: Facebook Post

**Hi Terry**

***I'd like to request you take down this facebook post please.***

***There are some comments and misinformation within this post that could be viewed as harmful***

***Please note, there IS currently an ongoing investigation with NZTA, and without elaborating much here, because there is final report to come, a supplier/component issue has been recorded as the issue***

***I'll keep you updated as soon as a formal report has been released.***

**Thank you**

[redacted]

[redacted], I thought that you and Joshua were based in Wellington or the South Island, I found out last week you are in Hamilton, a mere 1 hour drive from my office, yet you have not been to interview me, inspect our trailer or tow truck, nor even sent a meeting request which I would have attended

**How can NZTA imply those thing about my business operation when you have not even met or interviewed me !** I remain open to a meeting invite, AMB and TSV are welcome to attend the same.

Lastly I have included another photo from file which shows just how poorly these rims sit on the hub faces, you will note the outer flange of the rim goes over the recessed embossing, providing no clamping effect. You'll also see red 'rust dust' trailing away from the studs, something even NZTA produced an information sheet warning this is an indication of something is very wrong.

Other than bewilderment, my premise for this email is that, before responding to my OIA requests, there is a lot more technical information available for NZTA's review.

Terry Williams  
Director

027 3266 123 | P: 07 985 6280 | A: 182 Fraser Street, Tauranga | [www.medworx.co.nz](http://www.medworx.co.nz)

Out of scope

**From:** Out of scope  
**Sent:** Friday, 25 November 2022 12:13 pm  
**To:** 'Terry MedWorx (new)'  
**Subject:** RE: Wheel Detachments - Te WHatu Ora Safety Alert Release

Hi Terry

s 9(2)(a)

I have checked my availability to meet with you. I am available either Monday after 1pm on the 5<sup>th</sup> December or anytime Tuesday 6<sup>th</sup> December.

If you let me know your availability I will send a meeting invite. I am happy to travel and meet at the Waka Kotahi Tauranga office.

I do appreciate your patience waiting for me to organise this.

Thank you

Ngā mihi / Kind regards

Out of scope

### Manager Heavy Vehicle Certification

Te Roopu Waeture | Regulatory Services

Email: Out of scope [nzta.govt.nz](mailto:nzta.govt.nz)

Phone: s 9(2)(a)

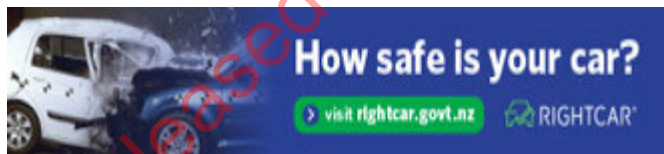
Mobile: s 9(2)(a)

**Waka Kotahi** NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

[Facebook](#) | [Twitter](#) | [LinkedIn](#)



---

**From:** Terry MedWorx (new) <medworx@xtra.co.nz>  
**Sent:** Tuesday, 18 October 2022 8:52 PM  
**To:** Out of scope <Out of scope@nzta.govt.nz>; Out of scope Out of scope@nzta.govt.nz>  
**Cc:** Out of scope Out of scope@nzta.govt.nz>  
**Subject:** Re: Wheel Detachments - Te WHatu Ora Safety Alert Release

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Thank you Out of scope

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On 18/10/2022 3:56 PM Out of scope <Out of scope@nzta.govt.nz> wrote:

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Director

027 3266 123 | P: 07 985 6280 | A: 182 Fraser Street, Tauranga | [www.medworx.co.nz](http://www.medworx.co.nz)

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**Cc:** Out of scope  
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Sent: Monday, October 17, 2022 11:10:14 AM  
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Out of scope

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**Sent:** Sunday, 27 November 2022 6:12 pm  
**To:** Out of scope  
**Subject:** RE: Wheel Detachments - Te WHatu Ora Safety Alert Release

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Hi [redacted]

it sounds like you've had a couple of full on months.

Anytime Tuesday 6th will work for me, send a request that works for you and I'll accept..

Cheers,  
Terry

On 25/11/2022 12:13 PM NZDT [redacted] <[redacted]@nzta.govt.nz> wrote:

Hi Terry

s 9(2)(a)

I have checked my availability to meet with you. I am available either Monday after 1pm on the 5<sup>th</sup> December or anytime Tuesday 6<sup>th</sup> December.

If you let me know your availability I will send a meeting invite. I am happy to travel and meet at the Waka Kotahi Tauranga office

I do appreciate your patience waiting for me to organise this.

Thank you

Ngā mihi / Kind regards

Out of scope

**Manager Heavy Vehicle Certification**

Te Roopu Waeture | Regulatory Services

Email: **Out of scope** [nzta.govt.nz](mailto:nzta.govt.nz)

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## Out of scope

**From:** Out of scope  
**Sent:** Friday, 3 February 2023 10:53 am  
**To:** Out of scope  
**Cc:** Out of scope  
**Subject:** RE: Dental Trailer wheel loss issue.

Thanks [redacted]

I can look at this on Tues, so how about book a meeting with me for Tues afternoon or Wed. I'm tied up looking at some Clean Truck requirements today.

Regards

[redacted]

Out of scope (he/him)

**Principal Engineer – Technical Regulatory Team**  
Regulatory Standards and Implementation

Te Roopu Waeture | Regulatory

Email: Out of scope@nzta.govt.nz

Phone: s 9(2)(a)

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40 Years of service

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**Cc:** Out of scope <Out of scope@nzta.govt.nz>  
**Subject:** Dental Trailer wheel loss issue.  
**Importance:** High

Hi [redacted]

Cc - fyi

Please see the attached Investigation report for Action Manufacturing dental trailers and the two wheel loss incidents that have occurred on two of these trailers in 2017 and 2020.

We are going to be releasing this on our website.

Action manufacturing have ordered parts and have spacers being machined. Parts are due to arrive etc by the 11<sup>th</sup> Feb and further correspondence to the DHB's will occur with further instruction from there.

They (Action) have been made aware that this is urgent.

The DHB are sending me emails wanting answers and asking what we are doing about this. This is impacting child oral health.

Can you please read this report and let me know when you are available to discuss.

Is there any regulatory levers we should be pulling in this instance?

Really appreciate your urgent response.

Thank you

Ngā mihi / Kind regards

## Out of scope

### Manager Heavy Vehicle Certification

Te Roopu Waeture | Regulatory Services

Email: **Out of scope** [nzta.govt.nz](mailto:nzta.govt.nz)

Phone: **s 9(2)(a)**

Mobile: **s 9(2)(a)**

### Waka Kotahi NZ Transport Agency

Hamilton, Level 1, Deloitte Building, 24 Anzac Parade

PO Box 973, Waikato Mail Centre, Hamilton 3240, New Zealand

[Facebook](#) | [Twitter](#) | [LinkedIn](#)



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## Out of scope

**From:** Terry MedWorx (new) <medworx@xtra.co.nz>  
**Sent:** Saturday, 17 December 2022 11:59 am  
**To:** Out of scope  
**Subject:** Update information please.

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Hi [redacted]

LakesDHB have a dental trailer they need to move ASAP, it has been sitting unused at the same rural school for almost 6 months and the school want it gone, the low load recovery truck is out of service. Please advise if you have any updated information.

Please also find below an email from [redacted] s 9(2)(a) the Cromwell transport operator, [redacted] s 9(2)(a) sent it in 2020 after our detachment and is lamenting that in 2017 AMB were being uncooperative and even obstructive in trying to determine the cause and instead putting the blame on him, (my text highlighting)

[redacted] s 9(2)(a) indicates AMB or BNT took possession of the other wheels from the trailer in 2017 and he never heard back, [redacted] s 9(2)(a) note this as this suspicious.

[redacted] s 9(2)(a) and [redacted] s 9(2)(a) knew full well about the 2017 detachment and saying they did not and then trying to put the blame on me is a deliberate and deceitful attempt to deflect blame from themselves.

[redacted] s 9(2)(a) alludes to other issues with these trailers, notably tyre blow outs and I know several Waikato trailers had the same problem.

There have also been numerous incidences of the main doors blowing open and snapping off in transit and flying into oncoming traffic.

[redacted] s 9(2)(a) says in another email he has had 7 doors blow open and snap off in transit and in the BoP we have had 2 doors blow off. [redacted] s 9(2)(a) is fully aware of this, I sent him photos, ironically AMB advised me 'I'm the only one that has had this problem, so I must be doing something wrong "

AMB have made over 100 different types of dental trailers fitted with the same type of doors, yet they have not made any improvements to the doors, if you think doors blowing off and flying into oncoming traffic is of concern to NZTA then I can provide more information,

AMB and TSV may say ' safety is the forefront of everything they do ' but evidence would indicate otherwise.

Please advise on the LaksDHB situation ASAP.

Thank you,

Terry

From: [redacted] s 9(2)(a) [redacted] s 9(2)(a)@dentmed.co.nz> 14/7/2020 9:02 PM  
Re: Wheel off the mobile.  
To Terry MedWorx (new) [medworx@xtra.co.nz](mailto:medworx@xtra.co.nz)

Hi Terry,

Our engineers found there was not a good flat surface evenly around the hub . I will trawl out the photos .

**I got no support from either AMB or BNT .They were very keen to get the hubs of the other wheels which our mechanics felt suspect . Never saw them again !!!**

Same as your incident I had checked visually the wheel nuts and only travelled about 5 km out of Cromwell. Our mobile had less than 1500Kms.

I hope you can keep this alive and make sure you ask them to review with reference to our accident . Ours caused extensive damage to the body behind wheel . It was the same wheel as yours.

Our incident occurred at about 70kph on the highway with catastrophic explosion as the wheel broke off and ripped all the body skirt off and piping from the tank .The wheel shot across in front of a car travelling at 100Kph and bounced into the lake.

**The engineers & mechanics supported me but AMB & BNT representing CME accused me of allowing the wheel nuts to come loose .**

Recently we have been having tyres blow out on these trailers , it has proven to have not the best tyres and we are replacing all tyres.

Good luck ,  
Thanks s 9(2)(a)

M: 027 3266 123 | P: 07 985 6280 | A: 182 Fraser Street, Tauranga | [www.medworx.co.nz](http://www.medworx.co.nz)

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**From:** Out of scope  
**To:** [Terry MedWorx \(new\)](#)  
**Subject:** Waka Kotahi - Medworx Meeting

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Hi Terry

Hope this time works ok for you.

Our reception is on Level 3.

Thank you

Out of scope

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## Out of scope

**From:** Terry MedWorx (new) <medworx@xtra.co.nz>  
**Sent:** Monday, 17 October 2022 11:10 am  
**To:** Out of scope Out of scope  
**Cc:** Out of scope  
**Subject:** Wheel Detachments - Te WHatu Ora Safety Alert Release  
**Attachments:** Memo Health and Safety Alert - Mobile Dental Unit Trailer Wheel Failure.pdf; Kodiak Rim Embossing.JPG

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Good morning Out of scope and Out of scope

I am aware of the recent NZTA media statement in regards to the wheel detachments that has been quoted both in news broadcasts and published on line by Radio New Zealand.

The clear implication is that the transport operators (me !) 'may have' been largely if not solely responsible for these wheel detachments, yet NZTA provided not one statement of proof of these allegations.

Using the word '*may have*' does not absolve NZTA from the associated implications.

Attached is the most recent Te Whatu Ora Health New Zealand Safety Alert dated 27/09/2022. This is the latest of many safety alerts published since the first detachment in 2017. Te Whatu Ora is clearly focussing on the engineering aspects of the design, not the transport operators. They raise no concerns about the actions of the transport operators and include statements such as:

**" Enquires and subsequent incident investigations concluded that the incorrect wheel assemble was attached to the hub resulting in the sheering of the wheel studs while being towed, leading to the wheel coming adrift from the MDU trailer "**

**And:**

**" NZTA & NZ Police were both notified, and the Police conducted an assessment of the wheel assembly and concluded there was a "design issue". However, the original manufacturer refutes there is a design issue and rather cites a towing operator error. This hypothesis has been refuted by several engineering reports and the NZ Police report. "**

This is a public document and Te Whatu Ora Health New Zealand released Action Manufacturing's name.

There is a Facebook group "**Unofficial NZ WoF/CoF Standard Advice Group**" It has 3,200 member and the majority of members are NZTA WoF/CoF Inspectors, NZTA certifiers, engineers and mechanics. I have published extensively on this forum, in most parts I have redacted personal details.

I am not even a mechanic, I walked into a lions den of engineering expertise. This forum has proven to be the ultimate peer review, 3,200 potential engineering specialists reviewing a mere transport operators description of a complex engineering situation.

Without exception everyone is in agreement that this is an engineering and manufacturing situation and that the transport operator had nothing to do with these detachments.

Topics covered include technical discussions on the rims and hubs, in-depth technical detail on wheel torque, etc, it is interesting that the recommended nut torques on these wheels are the same torque as almost every domestic

car. There are technical explanations as to why only 2 out of 23 trailers have so far suffered detachments, the answer as you can see in the forum is because of 'chewing gum'.

I invite anyone from NZTA to at least temporarily join this group, there is a substantial amount of technical information, like all groups you remain anonymous unless you post something.

NZTA's comment that the detachments "**may have been impacted by other contributing factors, including.... how the vehicle is maneuvered into location**" is without foundation and as someone who takes moving these clinics seriously, I cannot be anything but offended.

I have moved 25 mobile clinics for over 12 years, we undertake 100-120 clinic moves per year, that is over 1,200 mobile clinic moves, we have never once incurred any damage to these clinics. Maybe other operators do ?, we don't, and if you review the forum, you'll see a detailed description of exactly why we don't damage these units.

Action Manufacturing are aware of the Facebook Forum and have asked me to delete it, this is the email from [redacted], AMB [redacted], you will note even [redacted] says "**a supplier/component issue has been recorded as the issue.**"

[redacted] is a gentleman, I communicate with him on other matters, I have not (yet) posted a redacted copy of his email on Facebook as I do not want to compromise his employment.

----- Original Message -----

From: [redacted] [redacted]@actionmanufacturing.co.nz>  
To: "Terry MedWorx (new)" <medworx@xtra.co.nz>  
CC: [redacted] <[redacted]@actionmanufacturing.co.nz>  
Date: 06/09/2022 1:34 PM  
Subject: Facebook Post

**Hi Terry**

***I'd like to request you take down this facebook post please.***

***There are some comments and misinformation within this post that could be viewed as harmful.***

***Please note, there IS currently an ongoing investigation with NZTA, and without elaborating much here, because there is final report to come, a supplier/component issue has been recorded as the issue.***

***I'll keep you updated as soon as a formal report has been released.***

**Thank you**

[redacted]

[redacted] I thought that you and Joshua were based in Wellington or the South Island, I found out last week you are in Hamilton, a mere 1 hour drive from my office, yet you have not been to interview me, inspect our trailer or tow truck, nor even sent a meeting request which I would have attended.

**How can NZTA imply those thing about my business operation when you have not even met or interviewed me !** I remain open to a meeting invite, AMB and TSV are welcome to attend the same.

Lastly I have included another photo from file which shows just how poorly these rims sit on the hub faces, you will note the outer flange of the rim goes over the recessed embossing, providing no clamping effect. You'll also see red 'rust dust' trailing away from the studs, something even NZTA produced an information sheet warning this is an indication of something is very wrong.

Other than bewilderment, my premise for this email is that, before responding to my OIA requests, there is a lot more technical information available for NZTA's review.

Terry Williams  
Director

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## Memorandum: Health and Safety Alert

### Trailer Wheel Assembly Failure of Mobile Dental Unit (MDU)

27 September 2022

From Kate Coley, Interim Health and Safety Lead

Over the past few of years there have been a number of incidents relating to dental trailers, used for providing dental clinic services to schools. These incidents related to the wheel assembly and the “sheering off” of the wheel mount while being towed on an open highway. No injuries were reported in both incidents.

Enquires and subsequent incident investigations concluded that the incorrect wheel assemble was attached to the hub resulting in the sheering of the wheel studs while being towed, leading to the wheel coming adrift from the MDU trailer.



#### Background Information

1. Around 2013 under a Ministry of Health (MoH) procurement process approximately 23 Dental trailers (MDU s) were obtained and distributed to various DHBs nationally.
2. Southern, Lakes & BOP districts have all undertaken remedial actions including, re-engineering the trailer and transporting trailers on flat bed trucks until trailers were deemed safe for towage. All vehicles involved in these incidents had low mileage.
3. NZTA & NZ Police were both notified, and the Police conducted an assessment of the wheel assembly and concluded there was a “design issue”. However, the original manufacturer refutes there is a design issue and rather cites a towing operator error. This hypothesis has been refuted by several engineering reports and the NZ Police report.

#### Recommended actions to mitigate potential risk of harm and or injury

1. **Review all dental trailers.** Review all trailers currently owned and operated in all health districts. This alert is in particular reference to trailers manufactured by Action Manufacturing and delivered to DHBs around 2013 under the MoH procurement initiative.
2. **Out of Service.** Consider the removal from service of all dental trailers manufactured by Action Manufacturing until the wheel assemblies have been assessed by an independent third party engineering firm. Advise the third party

that you are looking to investigate the axel/hub and rim combination. The assessment should look to ensure that the wheel is correctly spigoted onto the hub, assess that the correct stud points are centred appropriately and investigate any manufacturing or design flaws that may result in a failure of the wheel assembly.

3. **Maintain situational awareness.** All teams operating these vans should be vigilant when towing. Detailed pre-start inspections on vehicles prior to use, with particular attention to be emphasised on the wheel assemblies are recommended.
4. **Report.** Any wear & tear identified or concerns about the vehicles warrant of fitness should be raised via line managers and fleet management as per local protocols. If you have any questions or queries please raise with your respective Te Whatu Ora District Health & Safety Manager, in the first instance

**Kate Coley**

**Change & Workforce Transition Lead**

waea pūkoro: +64 27 234 0013 | Īmēra: [kate.coley@health.govt.nz](mailto:kate.coley@health.govt.nz)



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