

Automated Vehicle Safety Reforms

ITS Australia Submission

June 2024



ITS Australia sincerely appreciates the opportunity the Commonwealth Government and National Transport Commission has provided to make a submission on this important topic. Following the NTC 2018 consultation on safety assurance for automated vehicles we value the continuation of this necessary work to determine best approaches to ensuring end-to-end safety for automated vehicles in Australia.

ITS Australia is the peak body for the transport technology sector and many of our 150+ member organisations play a role at the leading edge of new and emerging technologies to improve safety and efficiency on our transport networks.

With more than 1,200 people dying and over 30,000 people being seriously injured each year on Australia's roads, the only long-term goal we can have is for zero fatal and serious injuries. To that end, we believe automated vehicles are one of the technologies available to support achieving that target.

As noted in the draft National Road Transport Technology Strategy, new road transport technologies like connected and automated vehicles (CAVs) are coming and ITS Australia commend the government on developing necessary reforms that consider the issues and opportunities to be addressed and leveraged in the immediate future for the benefit of Australia and Australians.

ITS Australia supports the advancement of connected and automated vehicles and cooperative ITS technology and see the appropriate deployment as a pathway to provide safer, more efficient and more sustainable transport. With the background of these promising developments both nationally and internationally, we also appreciate that these new technologies come with the need for necessary changes to how vehicles operate on our networks and how manufacturers and drivers responsibilities may therefore change, and very much support the need for collaboration across the sector that is required to realise these critical safety benefits for our industry and the communities they serve.

ITS Australia strongly endorse the objective for Australian governments to take a nationally consistent approach to automated vehicle technology and focusing on harmonisation while recognising jurisdictional differences is a key requirement for both industry confidence and government investment and effective deployment across our networks.

Existing road laws in Australia apply to human drivers and do not address the unique challenges posed by automated vehicles and new laws will be necessary to allocate responsibility for the safe operation of automated driving systems (ADS) and to hold the appropriate parties accountable.

Nationally consistent laws are necessary to access the potential benefits of automated vehicles and avoid unnecessary difficulties for companies bringing their vehicles to the market. Automated vehicles should follow a safety first principle. Clearly defined capability and operational constraints of the systems to ensure users understand their roles and responsibilities when using and/or owning such a vehicle.

Building on the existing regulatory frameworks that have been developed over the past five years by state and federal governments, ITS Australia strongly endorse a harmonised approach and alignment with the EU and international design rules and safety metrics to minimise barriers to entry and deployment of these important vehicle technologies while acknowledging and responding to any unique Australian characteristics.

ITS Australia strongly support alignment with EU and other international design rules and safety interventions and support additional Advanced Driver Assistance System (ADAS) and automated driving system (ADS) functionalities as international vehicle regulations are developed foster collaboration across the Commonwealth, states and territories to deliver an integrated national AV regulatory framework.

ITS Australia undertake to continue to provide any necessary support to NTC's work on end-to-end AV regulatory framework, including essential industry engagement and international knowledge sharing, and strongly endorse the development of national policy positions/model law to support the states and territories to implement the complementary law changes.

These technologies are saving lives now and will only become more effective in the future – but to ensure the widespread application of these technologies, consumers need to appreciate, fully accept and even encourage their deployment ITS Australia is extremely supportive of the development of a repository of education and training materials for ADAS and ADS that can facilitate the dissemination of consistent messaging for vehicle users by government and industry to customers and the Australian public.

This includes educating industry and the public about user and entity responsibilities under the national AVSL, and supporting the AV in-service safety regulator, once established, in their educative role in relation to AV regulation for industry and vehicle users.

Conclusion

ITS Australia commends the Federal Government and the Department of Infrastructure, Transport, regional Development, Communications and the Arts, in undertaking this important work to better understand the impacts and opportunities connected and automated vehicles offers and is supportive of nationally harmonising safety laws under which these vehicles will operate, whilst ensuring our regulations are in keeping with our international peers and in partnership with industry stakeholders.

There are a number of assumptions made of the potential benefits automated vehicles could offer; safer roads, more sustainable networks and emissions reductions included. There is real opportunity to leverage international partnerships and test these assumptions in real world environments, offering a centralised and streamlined approach to support trials would be a positive step towards understanding both the impacts of these technologies on our networks as well as the regulatory impacts.

The safety of our citizens is paramount and driver assistance technologies are clearly saving lives on our roads now. Emerging and future technologies will provide enhanced in-vehicle and network safety and efficiency; however the deployment of these technologies needs government consideration and oversight. Industry is keen to work with government to best deliver these life-saving technologies, and ITS Australia is well placed to facilitate these discussions and activities.

To facilitate any future engagement, ITS Australia Policy Manager Stacey Ryan can be contacted 



Yours sincerely,



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