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**Proposed Acoustic Vehicle Alerting Systems for Electric Vehicles**

The Electric Vehicle Council (EVC) welcomes the opportunity to provide input on the introduction of an Acoustic Vehicle Alerting Systems (AVAS) mandate for Electric Vehicles (EVs).

The EVC is the national peak body for the EV industry in Australia. Our mission is to accelerate the electrification of transport for a sustainable and prosperous future. We represent members across the EV value chain, including car, bus and truck manufacturers, importers, operators, charging infrastructure suppliers, battery reuse and recycling companies, financiers, and network providers.

**Introduction of mandated AVAS for new light EVs**

The EVC is supportive of measures taken by the Australian Government to harmonise Australian Design Rules (ADRs) with international standards. International alignment is necessary to reduce the cost burden for manufacturers supplying new vehicles to the Australian market. Accordingly, we welcome the proposed adoption of United Nations Regulation 138/01 (UN R138/01) as a new ADR under the *Road Vehicle Standards Act 2018* (Cth) (RVSA), to avoid unnecessary duplication in the form of a unique Australian standard.

We note that as many OEMs have already incorporated AVAS into their light EV offerings on the Australian market, this new regulation will largely formalise the existing inclusion of AVAS in many available vehicles. The adoption of UN R138/01 will serve to ensure a consistent approach to new vehicles being introduced to the market in the future.

**Scope of regulation**

The EVC supports the government's commitment to enhancing pedestrian safety through the introduction of AVAS for light EVs. We believe that aligning with international standards will facilitate interoperability for OEMs and improve overall road safety for pedestrians and other

road users. While we understand the scope of the regulation will be restricted to new vehicles, it may also be necessary for the Government to clarify how the proposed ADR changes apply to parallel imports, which represent a small portion of imported EVs in the Australian market. To achieve the desired outcome of reducing harm to pedestrians and other road users, the Government should emphasise the consistent application of AVAS requirements across all light EVs entering Australia. This will ensure that the safety benefits of AVAS are extended to all EVs regardless of importation method, fostering a comprehensive and standardised safety framework for the entire EV market.

While the current proposal confines the new requirements to light EVs, we recognise the importance of considering the mandating of AVAS for heavy EVs in future, subject to international developments. We note that while UN R138/01 standards are applicable to heavy vehicles, these have not yet been extended to apply to heavy EVs in major markets including the US. As the EV industry continues to evolve and heavy EVs become more prevalent, further research and data collection will assist with assessing the costs, benefits, and feasibility of implementing AVAS mandates beyond light vehicles. It is also important that the development of any requirements for heavy vehicles are aligned with international developments, to avoid the implementation of a unique Australian standard that introduces an unnecessary cost burden for OEMs supplying the Australian market. The EVC remains committed to actively engaging with the Government and relevant stakeholders, including heavy vehicle OEMs, to provide necessary information to support evidence-based decision-making on AVAS requirements for heavy EVs.

## **Implementation timeframe**

We recommend the Government considers an appropriate 18 to 24-month transition period to reduce the regulatory burden on manufacturers. The proposed timeframes of 1 January 2025 for newly approved models and 1 January 2026 for all newly manufactured vehicles appear to be reasonable, particularly if the ADR changes are legislated in mid-2023. By allowing sufficient time for manufacturers to adjust their production processes and incorporate AVAS into their vehicles where necessary, the industry can effectively manage the associated costs while ensuring compliance with the new ADRs.

## **Ongoing data collection and analysis**

Beyond the implementation of AVAS, the EVC recommends the Government work with State and Territory counterparts to establish a national reporting system that captures comprehensive data on all vehicles involved in road incidents. A comprehensive approach to data collection should encompass information including accidents, malfunctions and other safety-related concerns for both internal combustion engine and electric vehicles to identify patterns and areas for improvement. Establishing a robust national data collection framework will allow for effective monitoring of all road incidents and facilitate the development of appropriate evidence-based responses to enhance overall safety.

## **Summary**

The EVC supports the introduction of AVAS for light EVs to enhance road safety through the alignment of ADRs with international standards. Harmonisation with international approaches promotes interoperability within the global automotive industry and enhances Australia's position in the evolving EV market.

While beyond the scope of the current consultation, the EVC recommends further measures to promote international harmonisation, including the revision of ADRs for heavy vehicles. Urgent updates to align ADRs with international standards would enable the importation of a wider range of electric heavy vehicles to Australia, promoting the sustainability of the freight sector. This includes increasing the minimum truck width from 2.5 to 2.55 meters and providing at least a one-tonne mass concession to zero-emission/electric trucks. The EVC welcomes the opportunity to discuss these recommendations further with the Department as needed.

If you have any questions on this submission, please contact Natalie Thompson, Senior Policy Officer at: [office@evc.org.au](mailto:office@evc.org.au).

Thank you for your consideration of our submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B Jafari'.

Behyad Jafari

Chief Executive Officer

Electric Vehicle Council