



**CONSERVATION
COUNCIL** ACT REGION

Submission to National Transport Commission

Automated vehicle safety reforms

June 2024

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

For further information please contact:

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Introduction

The Conservation Council ACT Region appreciates the opportunity to provide comments to the National Transport Commission regarding automated vehicle safety reforms.

Automated vehicle technology should be strategically implemented as part of an integrated transport system with the goal of moving people and goods (rather than moving cars). Doing so could shift our entire mindset from cars as individual property to transport/mobility as a service. This could have enormous co-benefits, from reducing greenhouse gas emissions to reducing traffic congestion on roads, reducing road accidents and the consequent public health costs, freeing land from car parking for other more valuable uses, improving transport accessibility for vulnerable passengers, reducing transport costs for households and businesses, reducing material resource extraction, and so on. To maximise these potential benefits, autonomous vehicles must be electrically powered and predominantly deployed as part of fleets of shared vehicles that gradually displace privately owned fossil fuel vehicles.

The Conservation Council largely supports the proposed legislative inclusions, such as corporate responsibility for the safe operation of vehicles. However, the Council recommends placing a much greater explicit emphasis on the safety of non-vehicular road users and the safety, accessibility and equitability of autonomous vehicles for passengers with disabilities or vulnerabilities. This could include measures such as requiring vehicles to be designed for wheelchair access, and installing adequate lighting and closed-circuit video recording (inside and outwards-facing). Operation of autonomous vehicles must improve, not reduce, priority and space allocation for people walking, cycling and using public transport services. Automated vehicle services should displace private vehicles, not active travel and public transport.

Transport planners should complement automated vehicle legislation with measures to drive the replacement of private vehicle usage with shared-vehicle fleet services. This could include fees or restrictions on private vehicles in town centres, subsidised fares for fleet services (particularly focused on equitable access), access to rapid transit lanes for shared fleet vehicles, and tax credits for relinquishing a private vehicle. Urban planners should collaborate with transport and fleet planners to convert existing car parks to high-quality, biodiverse green spaces. Transport planners should establish a clear hierarchy of road users that places active travel and public transport as the highest priority for safety and flow, then public transport, then shared fleet vehicles (autonomous or otherwise) then private vehicles (automated or otherwise).

The adoption of autonomous vehicles will require investment in urban and rural road infrastructure, such as clearer signage, more consistent road markings, and better maintenance of surfaces. These upgrades should be undertaken so as to improve road utility and safety for all road users, such as implementing lower speed zones through residential and high-pedestrian activity areas, building connected footpaths and separated cycle lanes so that people have efficient and safe alternatives to walking or cycling on streets. Data collected from automated vehicles would be extremely valuable in designing these improvements so must be accessible to a variety of Government and non-government users.

New legislation for automated vehicles is also an opportunity to improve the environmental sustainability of Australia's vehicle fleet. Iterative improvements in (recycled) resource use and greenhouse gas emissions reductions should be factored into manufacturing standards, along with requirements for operating entities to take responsibility for recycling vehicles.

Recommendations

The Conservation Council supports the recommendations submitted by Better Streets and Living Streets Canberra. In particular, the Council recommends:

1. Legislation governing automated vehicles must prioritise the safety of non-vehicular road users regardless of any illegality or unpredictability of their actions, without any erosion of the rights or increase in the restrictions or responsibilities of people using streets.
2. Legislation governing automated vehicles must prioritise the safety, accessibility and equitability of autonomous vehicles for passengers with vulnerabilities.
3. Operation of autonomous vehicles must improve, not reduce, priority and space allocation for people walking, cycling and using public transport services.
4. Automated vehicle technology should be deployed primarily in fleet services to displace private vehicles.
5. All autonomous vehicles should be zero-emissions vehicles (ie electrically powered).
6. Autonomous vehicles must be able to respond to avoid animals (domestic pets, agricultural livestock, wildlife) without putting people at risk.
7. The compliance framework must be consistently enforced with fines high enough to drive safety compliance and improvements in the first instance (rather than preferring to pay fines). Operating entities must demonstrate financial capacity for maintenance and reparations before deploying vehicles, such as through a substantial bond held by the Australian Government (ie no voluntary administration/bankruptcy cop-outs).
8. Corporate entities must demonstrate environmental responsibility, such as minimising the materials and energy footprint during manufacture and for recycling vehicle materials at the end of a vehicle's on-road usage.
9. Data must be shared to enable constant improvement in road safety and transport efficiency by all road users, transport system operators and urban planners.