

Department of State Growth

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Dr Geoff Allen
Acting Chief Executive
National Transport Commission
3/600 Bourke Street
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By email: htsirlina@ntc.gov.au

Dear Dr Allen,

Thank you for your letter of 27 September 2018 and the opportunity to provide a submission in response to the National Transport Commission's (NTC) discussion paper *Regulating government access to C-ITS and automated vehicle data* (the Discussion Paper). The Department of State Growth is supportive of the NTC's broader automated vehicle program and the aim of creating a national regulatory framework that supports the safe commercial introduction of automated vehicles on Australia's roads.

I note the issues detailed in the Discussion Paper around potential challenges faced by governments in accessing data generated by automated vehicles and connected intelligent transport systems (C-ITS). State Growth, like most other transport agencies, is already faced with addressing these issues, for example when implementing roadside C-ITS and in-vehicle technology such as security cameras in taxis and alcohol interlock devices.

Tasmania currently has an information protection framework underpinned by the *Personal Information Protection Act 2004*. This Act focuses on regulating the collection, maintenance, use, correction and disclosure of personal and sensitive information by government agencies, no matter where the information may have originated from. When considering the potential privacy challenges presented in the Discussion Paper, State Growth's view is that these would all be adequately covered by our existing vehicle and traffic legislation and obligations under the *Personal Information Protection Act 2004*.

Given the suitability of our existing regulatory framework, State Growth is not a strong proponent of a legislative approach to addressing data access and privacy issues. However, there is recognition that there may be a need for a nationally consistent approach to the issues raised in the Discussion Paper given that each jurisdiction takes a different approach to data access and privacy.

In considering any national approach, it is important to aim for a balance between restricting government access to protect privacy while also ensuring that governments can effectively utilise available data collected from C-ITS and automated vehicles technologies in order to deliver safer and more efficient outcomes on our roads.

Please contact Penny Nicholls, General Manager Road User Services, by email at penny.nicholls@stategrowth.tas.gov.au or telephone on (03) 6166 3255 for more information.

Yours sincerely



Kim Evans
Secretary

3 December 2018