



28 July 2017

Automated Vehicle Team  
National Transport Commission  
Via email: [jwilliams@ntc.gov.au](mailto:jwilliams@ntc.gov.au)

Dear Commissioner

***Regulatory options to assure automated vehicle safety in Australia – Discussion Paper***

I write in response to the discussion paper entitled *Regulatory options to assure automated vehicle safety in Australia*. The NRMA contends that regulations pertaining to automated vehicles and their operations should be consistent with international best practice.

Given the rapid onset of autonomous technologies and the myriad of benefits these technologies can provide the community, the NRMA gives in principle support to the National Transport Commission's self-certification option for the safety assurance of automated vehicle functions:

*Self-certification – manufacturers make a statement of compliance against high-level safety criteria developed by government. This could be supported by a primary safety duty to provide safe automated vehicles.*

The NRMA supports the self-certification model due to its flexibility, efficiency and consistency. Self-certification also supports innovation and can be implemented in a short timeframe.

The NRMA believes that self-certification should be mandatory – this approach would provide government with control over safety demonstrations and improve the National Transport Commission's evaluation criteria pertaining to self-certification.

While mandatory self-certification is supported as the most appropriate model, the NRMA believes that a transitional approach to the development of a safety assurance system should be adopted. If automated vehicles eventually become concentrated in fleets, accreditation may be the most appropriate safety assurance system in the longer term.

The NRMA thanks the National Transport Commission for the opportunity to comment on the discussion paper. Should any further information be required, please contact NRMA Senior Policy and Public Affairs Advisor, Robert Giltinan, on (02) 9276 7214 or [Robert.Giltinan@mynrma.com.au](mailto:Robert.Giltinan@mynrma.com.au).

Yours faithfully

A handwritten signature in black ink, which appears to read "Matt Gijselman". The signature is fluid and cursive, with a long horizontal stroke at the end.

**MATT GIJSELMAN**  
**General Manager – Public Affairs**