



13 July 2018

Automated Vehicle Team
National Transport Commission
Level 3, 600 Bourke Street
Melbourne VIC 3000

To the Automated Vehicle Team,

RE: Safety Assurance for Automated Driving Systems

The NRMA welcomes the opportunity to provide comment to the *Safety Assurance for Automated Driving Systems* consultation paper. The NRMA strongly supports the introduction of connected and automated vehicle technology in Australia based on the potential benefits to road and transport safety.

A safety assurance system based on mandatory self-certification to enable the introduction of this technology to the Australian market is the preferred approach of the NRMA.

While the NRMA seeks to encourage the accelerated adoption of connected and automated vehicles in Australia, the transition to this new technology must be considered alongside an emphasis on safety to build consumer confidence and road safety outcomes.

Given our unwavering position and commitment to road safety, the NRMA offers its in principle support for the National Transport Commission's preferred safety assurance system option (Option 4): *Legislative Safety Assurance System, including a Primary Safety Duty*.

This approach to safety assurance provides the greatest consideration to road safety when introducing connected and automated vehicle technology to Australian roadways.

A Legislative Safety Assurance System, including a Primary Safety Duty will:

- Establish a dedicated automated vehicle safety agency to oversee safety-related issues pertaining to the operation of automated driving systems and vehicles;
- Put in place ongoing measures to ensure the highest level of automated vehicle safety by accommodating future technological advances through the provision of a non-prescriptive duty on manufacturers or suppliers to proactively manage unforeseen safety risks as they arise;
- Ensure that necessary software updates and critical safety amendments or upgrades are provided to support the safe operation of automated vehicles through transparent data awareness and practices;
- Provide the community with confidence that the Australian certification and safety assurance system is sufficiently robust to actively manage risks as they arise and provide appropriate enforcements through government when necessary to maintain the highest safety standards possible; and
- Support high levels of automated vehicle adoption by providing surety to automated vehicle manufacturers and suppliers.

The NRMA does not anticipate this assurance system discouraging potential manufacturers or suppliers from entering the Australian market, provided that highly onerous or overprotective regulations are not put in place.



To ensure that automated driving vehicle and system manufacturers or suppliers are not disadvantaged or discouraged, the NRMA submits that the proposed government agency with responsibility for administering the safety assurance system under Option 4 should have a clearly defined remit.

Where possible, regulatory costs to industry should be negated or minimised to provide certainty and encourage supply.

While this preferred approach to safety assurance is supported in principle, the NRMA contends that the system must be implemented by 2020 to accommodate SAE Level 4 automated technology.

In addition, the NRMA recommends reviewing this approach to safety assurance periodically to ensure that it provides the right framework for managing risk as more automated vehicles enter the Australian fleet. The constant objective should be to ensure that consumers have access to proven vehicle technology at the lowest possible price point while maintaining stringent safety standards.

As connected and automated technology develops and its impacts on productivity, safety and industry become clearer, an alternative approach (such as accreditation) may be most appropriate in the longer term.

The NRMA thanks the National Transport Commission for the opportunity to comment on the *Safety Assurance for Automated Driving Systems* consultation paper.

Should any further information be required, please do not hesitate to contact NRMA Senior Policy and Public Affairs Advisor Robert Giltinan on (02) 9276 7214 or Robert.Giltinan@mynrma.com.au.

Yours faithfully,

A handwritten signature in dark ink, consisting of a series of loops and a long horizontal stroke extending to the right.

RACHEL WISEMAN
Chief Investment Officer