

## AAA Submission on the draft *National Road Transport Technology Strategy* and the draft *2024-27 National Connected and Automated Vehicle (CAV) Action Plan*

### Introduction

The Australian Automobile Association (AAA) is the peak organisation for Australia's motoring clubs and their 8.9 million members. Its constituent clubs are the NRMA, RACV, RACQ, RAA, RAC, RACT and the AANT and the clubs have relevant experience, having been involved with a number of CAV trials in their jurisdictions. The AAA regularly commissions research and develops in-depth analysis of issues affecting transport systems, including affordability, road safety and vehicle emissions.

The AAA is pleased to provide feedback on the draft *National Road Transport Technology Strategy* (Strategy) and the draft *2024-27 National Connected and Automated Vehicle (CAV) Action Plan* (Action Plan).

The AAA supports the objectives of the Strategy and Action Plan in wanting a nationally consistent approach to technology deployment. Automated vehicles have the potential to provide significant benefits to road safety, alongside improvements to transport efficiency, productivity, accessibility and sustainability. However, it is important that new advanced technologies are deployed with a full understanding of their operation and that potential risks are managed appropriately.

The AAA would like to see appropriate regulation in place to build consumer confidence in automated driving technology, without adding unnecessary regulatory costs – as these will ultimately be borne by the consumer. Regulation should be harmonised with that in international markets from which Australian market vehicles are sourced.

Consumer confidence in the regulatory system will impact the degree to which consumers want to invest in new automated technology. Of particular concern to the AAA is ensuring the regulatory environment balances technology deployment with consumer expectations around safety, security and privacy.

The AAA thanks the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) for the opportunity to provide a submission.

### Response to the Consultation Questions

#### ***How can the role of governments and the principles guiding government action in the draft strategy be improved?***

#### **Principles**

The AAA notes the nine draft policy principles in the draft *National Road Transport Technology Strategy* which will guide nationally consistent decision-making across all jurisdictions to support deployment of new road transport technologies. Improving transport outcomes including safety is paramount.

Australia's road toll increased 6.5 per cent through the 12 months to 31 October 2023, with 1,247 people killed. Cyclist deaths increased 24.2 per cent over this period, pedestrian deaths by 8.5 per cent; and motorcyclist deaths by 1.7 per cent.

As stated in the *National Road Transport Technology Strategy*, vehicle technologies could reduce the likelihood and impact of human mistakes. Connected and automated vehicles (CAVs) could improve human decision-making by providing warning messages and alerts, and assistive technologies. Vehicles in the future with an Automated Driving System (ADS) are expected to further improve safety by reducing the ability for human mistakes to contribute to crashes. However, ADS are expected to rely on a complex integration of software and hardware to safely drive the vehicle. This may introduce new risks such as system related errors/decisions and potential human/machine interaction issues that may lead to crashes. The timing of and extent to which CAVs can deliver safety, efficiency, productivity, sustainability or accessibility benefits remains to be seen.

The development of a fit-for-purpose national regulatory framework for Automated Vehicles (AVs) to safely operate on Australia's roads is vital to mitigate risks while ensuring the safety of motorists. However, this is made difficult by the fact that much of the technology to be regulated has not yet been developed.

### **Role of governments**

The AAA recommends that state and territory strategies and roadmaps (which set out the activities they are undertaking within their own jurisdictions to facilitate technology deployment) be consistent with the draft *National Road Transport Technology Strategy* to ensure the benefits of new road transport technologies are realised for motorists through national consistency. As stated in the draft *National Road Transport Technology Strategy*, deployment and uptake of road transport technologies can make transport safer and more efficient, productive, sustainable and accessible, which in turn enhances economic, environmental and societal well-being.

Whilst the draft Strategy notes that all jurisdictions have agreed to develop an end-to-end regulatory framework for the safe commercial deployment of automated vehicles in Australia, expected to commence by 2026, the AAA notes that there is a degree of uncertainty regarding the timing for deployment of such technology. Further, the AAA is concerned personal data collected may present privacy risks to motorists and this will need to be addressed.

The AAA also acknowledges that new road transport technologies, including vehicles and surrounding infrastructure, are expected to generate large amounts of data which could be shared and used for a range of beneficial purposes including in real-time to enable better responses to incidents and manage road network demand, as well as over the longer term to improve transport planning, investment and maintenance decision-making. The collection and/or dissemination of data will need to ensure the privacy of motorists is maintained and cybersecurity preserved.

The AAA notes the regulatory stewardship roles that Australian governments may undertake. This will involve developing and maintaining a regulatory environment that balances enabling technology deployment with community expectations, including in relation to safety, security, privacy and accessibility. These issues are a key concern to AAA and constituent clubs.

***Are the actions in the draft action plan the right ones? Do you disagree with any proposed actions?  
Are there any actions missing?***

The AAA notes the proposed actions in the draft action plan. In particular, the AAA is keen to see an appropriate regulatory framework implemented to ensure consumer safety, security and privacy while using this new technology. Ensuring Actions 1.1 to 1.5 are implemented in a considered, timely and nationally consistent manner will be necessary to secure consumer confidence in the technology and therefore consumer uptake. Harmonisation across jurisdictions – which in the past has proven to be difficult in the transport space - will be vital to ensure interoperability of AV technology.

The AAA welcomes action items to monitor and harmonise Australian Design Rules (ADRs) as necessary to provide for connected and automated functionality as international vehicle regulations are developed.

The AAA is focused on protecting consumer data rights. There are no regulations or agreed processes for vehicle manufacturers to share vehicle data in a consistent format. However, the ownership of data is unclear and there are uncertainties regarding who can agree to sharing of data.

Data needs to be nationally consistent, reliable, accurate, high quality (including in its raw format) and secure. Data must be provided in real time for Cooperative Intelligent Transport Systems (C-ITS) to function effectively and to realise benefits. A national data exchange with a standard interface between central systems to rapidly utilise data across various systems is needed<sup>1</sup>.

As stated earlier, the AAA's constituent clubs NRMA, RACV, RACQ, RAA, RAC, RACT and the AANT have 8.9 million members. These clubs could assist with Action Items 1.6 and 1.7 in educating motorists about: the operation and use of vehicle ADAS and ADS; and user and entity responsibilities under the national automated vehicle safety law.

***What other changes should be made to the draft strategy and action plan?***

The AAA notes that particular actions will need to be completed to support the deployment of CAVs in the Australian market. Thus, the timing for completion of these activities will be determined by the timing of commercial availability of such vehicles, which will need to be monitored and timelines adjusted accordingly.

The AAA also recommends that DITRDCA reports annually on the progress of the Strategy and Action Plan. This will enable transparent monitoring of progress against the agreed Actions and ensure timelines can be met.

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<sup>1</sup> As per European regulations, known as National Access Point (NAP).