
FCAI response to:
DIRTDCA – Draft National Road
Transport Technology Strategy
and 2024-2027 CAV Action plan
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Federal Chamber of Automotive
Industries



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1.0 INTRODUCTION

The Federal Chamber of Automotive Industries (FCAI) welcomes the opportunity to provide its views on the [draft National Road Transport Technology Strategy and 2024-2027 CAV Action plan](#).

We understand that this round of consultation aims at collecting and considering broad industry feedback on the Strategy and Action Plan with the objective to submit the final documents to the Infrastructure Transport Ministers in the first half of 2024 for their approval by mid-2024. The Strategy is to ensure a nationally consistent approach to new road transport technologies – like connected and automated vehicles (CAVs) and including Cooperative ITS (C-ITS) – over the longer term while the Action Plan sets out the national priority actions that the Commonwealth, states, and territories intend to implement in the next 3 years to 2027.

The FCAI is the peak Australian industry organisation representing over 60 global automotive brands who design, manufacture, import and sell light duty passenger vehicles, light commercial vehicles, and motorcycles in Australia.

Connected, cooperative and automated vehicles can deliver significant safety and efficiency benefits for all road users, improve the overall vehicle drivers' experience, and provide valuable data insights for the management and planning of the road and broader transport infrastructure. Through their various roles at a global level as purchasers / developers, integrators / manufacturers, and distributors, the FCAI members play a key role in the planning and deployment of these new technologies. Coordination between the transport infrastructure and automotive industries is key to ensure an efficient and effective deployment in Australia and we look forward to our on-going participation in the various forums that support the Strategy and Action plan.

FCAI supports the objective of both the Strategy and Action plan for Australian governments to take a nationally consistent approach to technology deployment and particularly agree on:

- the need for certainty about the policy environment for technology deployment.
- the need for effort prioritisation in such a complex technology environment while keeping in mind the size of our market (approx. 1% of the global automotive market) and the fact Australia is a technology importer / adopter.
- the importance of the public sector providing policy leadership, regulatory stewardship, and targeted and coordinated investment where there is market failure or a clear public benefit.
- the 9 proposed principles governing the Strategy.

However, FCAI is of the view that the Strategy and its associated 2024-2027 Action plan could be more ambitious, committal, and further looking than 2027.

The following section provides feedback from FCAI and its members.

Calling for a stronger level of commitment and ambition towards Connected, Cooperative and Automated Vehicles

As stated in the draft Strategy, “by 2050, CAVs are estimated to reduce crash costs Australia-wide by approximately \$15 billion (this increases to \$152 billion by 2070, with 8,000 lives saved). CAVs are estimated to result in fuel use reductions worth \$6 billion and greenhouse gas emissions reductions worth \$1 billion by 2050”. If we accept that around 80% of road accidents are caused by human error, then prioritising connected, cooperative, and automated vehicle technologies becomes imperative to achieve our goal of zero harm. These technologies should also be recognised as a core priority in the National Road Safety Strategy and its associated action plans.

We acknowledge the criticality of Australia having a sound legal framework for the introductions of automated vehicles; however, we feel the current draft documents may not be taking all the opportunities at reach if any introduction is conditional on the AV safety legislation being in place by some time in 2026 at the earliest. While responding resolutely to the imperative of road safety, the Strategy would greatly benefit from striking a more effective balance between ensuring the safety of new technology solutions and creating the environment for such solutions to be tested and deployed in Australia. There are opportunities to reflect on from other jurisdictions: for instance, Europe has authorised Level 3 autonomous driving since [14 July 2022](#).

The draft Action Plan to 2027 provides valuable insights as to the key focus areas of the Australian public sector to support connected, cooperative, and automated vehicles and affirms the intention to coordinate actions across federal, state and territory agencies.

FCAI appreciates the distribution of roles and responsibilities between federal and state / territory agencies but would welcome a stronger and more practical coordination of decisions and investments between these entities. More specifically, funding to support the action plan should be centrally managed by the Office of Future Transport Technology at DITRDCA. This would help build up industry’s confidence that the plan will be delivered as stated in terms of scope and timeframes and that consistency of functionalities across geography and time will be guaranteed.

In addition, the Strategy and its associated Action plans should factor in that vehicle planning processes are in place 2-3 years before vehicle release to market. Vehicle requirements arising from the proposed draft action plan to 2027 may take years to be applied to production vehicles. This underscores the need for certainty in the effective delivery of the proposed plan and calls for the Strategy to provide a more tangible vision beyond 2027. A forward-looking approach will not only ensure the seamless integration of advancements into production vehicles but will also foster a sustainable and innovative automotive landscape in Australia.

Additional feedback for consideration

With regard to the draft Strategy:

- Consideration should be given to referring to connected, cooperative and automated vehicles rather than “CAVs” for clearer acknowledgment of the different technologies in scope and for closer alignment with the European efforts under the [CCAM](#) umbrella.
- The various technology solutions covered by the strategy will attract costs on end consumers. Policy principle #1 “*Improving transport outcomes*” should include explicit consideration for affordability / economic impact on end consumers. Other major industry transformations such as electrification should also be appreciated in this context.
- Policy principle #8 “*User-centric implementation*” focuses on ensuring technology solutions consider the diverse needs of the users. Further, the choice that consumers have of either using or not any technology solutions should be emphasised. If customers do not see a compelling value or cost benefit ratio for a given technology solution, they are less likely to purchase it, use it and therefore enable the broader benefits the technology promise.
- Possibly in Policy principle #9 “*Adapting to future change*”, the Strategy could include consideration for the on-going support and maintenance of the road and ITS infrastructure the agencies may deploy to support connected, cooperative, and automated vehicles. A set-and-forget approach would obviously be undesirable as the long-term targeted benefits rely on consistent and performing infrastructure.
- The draft Strategy could include consideration for the role of technology in future road funding / road user charging, particularly relevant in the context of electrification of the Australian fleet but also as vehicle ownership models evolve driven by connected, cooperative and automated vehicles.
- The section on Data and privacy states that “*vehicle manufacturers collect vehicle data to improve the features and services they offer*”. It is indeed necessary to appreciate what drives the vehicle manufacturers to collect vehicle-generated data: it provides promising opportunities to enhance the customer/OEM relationship and support new value-added services such as recall notification and predictive management. It is worth noting however that each vehicle manufacturer will have its own vehicle data strategy and capabilities: vehicle-generated data developments may not be consistent across OEMs outside of relevant standards and data sharing requirements that may apply.
- The section on Supporting infrastructure states that “*CAVs may need accurate satellite positioning information to maintain awareness of their location on the road*”. Based on experience to date, there is little doubt that accurate positioning will be needed to enable connected, cooperative, and automated vehicles.
- The Strategy would benefit from specific actions that engage local governments in the planning for supporting CAV infrastructure considering locally controlled roads account for approximately 77% of total road length in Australia and their current conditions is less likely to be “CAV ready” today.

With regard to Workstream #1 “*Vehicle automation*” of the 2024-27 Action plan:

- FCAI encourages actions relating to Advanced Driver Assistance System (ADAS) on the basis that these technology solutions are largely available in the market and provide clear safety benefits today. FCAI and its members would welcome the opportunity to participate in any efforts to develop education and training materials for ADAS (as per proposed action 1.6).

- As stated previously, action 1.1 could include more emphasis on how to efficiently introduce technology solutions that other markets are authorising (e.g. level 3).
- In relation to action 1.3, it is understood that the AV in-service safety regulator will be working very closely and efficiently with vehicle standards / ADRs to avoid duplication and unnecessary administrative burden on OEM's vehicle approval processes.
- In relation to monitoring and harmonisation of Australian Design Rules (ADRs) covered by actions 1.1 for ADAS and AVs and 2.6 for C-ITS, FCAI supports alignment of any future connected, cooperative, and automated vehicle regulation with relevant international standards. Regarding "*cybersecurity risks associated to CAVs*", FCAI members are open to the Australian Commonwealth considering the case for mandating UN R 155 on cybersecurity and UN R 156 on software updates as Australian Design Rules through impact analysis and with appropriate lead times.

With regard to Workstream #2 "*Vehicle connectivity*" of the 2024-27 Action plan:

- FCAI supports a national plan for implementing C-ITS in Australia and commend the State agencies that have shown leadership in this space to date, especially Queensland Transport and Main Roads through their CAVI program and the Victorian Department of Transport and Planning through their recently announced nationally coordinated C-ITS project.
- The national plan should leverage research and directions taken in other markets with a clear focus on how to adopt and deploy rather than repeating the research and reflexion undertaken in other markets.
- For transparency, it should be noted that C-ITS short-range communications is valued in the automotive industry, but it is considered in the context of the many competing challenges and priorities that the industry is facing (e.g. electrification, automation). The level of practical involvement of Australian OEMs in C-ITS short-range deployments may remain limited until such time as technology directions and infrastructure deployment plans are firmed up. This highlights the importance of a clear, detailed, committed national plan as proposed under action 2.1.
- Enabling long-range communications and making secure and quality data available from state and territory agencies to OEMs is a key opportunity to bring in the FCAI members in the C-ITS discussion. Particularly, it allows OEMs to leverage off the connected vehicle services they are already introducing to the market prior to considering further investments to support short-range use cases.
- The fact that the Principles for a National Approach to C-ITS in Australia released in draft in late 2022 are still not finalised raises questions as to the true level of alignment between the state jurisdictions. It is hoped that this doubt is unfounded and that the principles will be published very shortly.
- FCAI and its members reaffirm their support for radiofrequency spectrum reservations for C-ITS to remain in place as per action 2.4.

With regard to Workstream #3 "*Cross-cutting actions supporting CAVs*" of the 2024-27 Action plan:

- In relation to action 3.1, note that FCAI is responding to DITRDCA's discussion paper on Telecommunications Legislation and Connected Vehicles. FCAI suggests vehicles are made exempt of telecommunications carriage service provider (CSP) obligations.

- In relation to action 3.2, FCAI reaffirms its support to the NTC-facilitated Vehicle-generated data working group. It is understood that to date the working group has been considering the opportunities of vehicle-generated data to support road agencies in their functions (e.g. safety, planning, operations) and not only or specifically for the purpose of supporting “CAVs”. The working group’s scope and objectives will need to be confirmed to ensure alignment of intents.
- In relation to action 3.9 to identify the workforce impacts of “CAVs” over the next 5-10 years, it is recommended DITRDCA involves the newly-created Mining and Automotive Skills Alliance ([AUSMASA](#)) in light of its role in workforce planning and training product development. As FCAI is currently represented on the Board of Directors of AUSMASA, we would be pleased to facilitate any connection.

END OF FCAI SUBMISSION