

Director  
Fuel Efficiency Standards—Reducing Surface Transport Emissions Division  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts  
GPO Box 2154  
Canberra ACT 2601

Dear Director

ANCAP SAFETY welcomes the opportunity to provide a brief submission to the consultation into the proposed New Vehicle Efficiency Standard (NVES).

ANCAP is Australasia's independent vehicle safety authority. It exists to reduce road trauma through the testing and promotion of safer vehicles and provides consumers with transparent advice through a safety rating system between 0 and 5 stars. ANCAP's role is to encourage vehicle brands to design and build, and consumers to purchase and use, the safest vehicles possible. We set the benchmark to encourage vehicle brands to strive for the highest level of safety. We acknowledge those that meet or exceed top performance, and bring awareness to those that can improve.

ANCAP is complementary to, and supports, the Australian Government's regulatory requirements for new motor vehicles (the Australian Design Rules). ANCAP rates both categories of vehicles covered by the proposed NVES – light passenger vehicles and light commercial vehicles.

The transition to low-emission vehicles is a once in a lifetime opportunity to improve the safety of the Australian vehicle fleet. ANCAP has tested and rated over 135 vehicles with battery electric, hybrid electric, or hydrogen powertrains. The majority of these vehicles have scored the maximum five-star safety rating from ANCAP, indicating a high and balanced level of safety performance across the four assessment pillars of adult occupant protection, child occupant protection, vulnerable road user protection, and safety assistant.

ANCAP supports the recommendation made in the consultation impact analysis paper which indicates that the availability of vehicles with the best emissions and safety technology should be considered a key principle of the scheme. Safety must always be a priority in the delivery of any regulation or policy in the road vehicle space.

ANCAP notes the use of "average age of the vehicle fleet" as a success measure against this principle. However, ANCAP further notes that there is no guarantee that newer vehicles will meet the high safety standards that Australian expect from vehicle manufacturers. While most new vehicles sold in Australia do meet the high safety standards set by ANCAP, some new vehicles meet only the bare minimum legal requirements of the Australian Design Rules. In 2023, ANCAP tested and identified two brand new passenger vehicle models which scored zero stars – the lowest possible score under ANCAP's testing and rating protocol. These vehicles are currently on sale in Australia.

Australians expect a high degree of safety from new road vehicles. It is unfortunate that not all manufacturers are meeting those expectations. There is no guarantee that manufacturers will improve their safety performance in the future, even if they succeed in delivering vehicles that meet new emissions standards.

**ANCAP recommends that the Government consider whether a further success measure for this principle under the NVES should consider the proportion of vehicles sold in Australia with a current five-star safety rating from ANCAP, rather than simply considering vehicle age.**

Adopting this recommendation would align with the *National Road Safety Strategy 2021-2030*, which identifies “share of light vehicle fleet that has an ANCAP 5-star rating within a 6-year date stamp” as the key safety performance indicator in the “safer vehicles” pillar.

If there is further information ANCAP can provide, please get in touch with our [REDACTED] at [REDACTED] or [REDACTED]

Yours sincerely

[REDACTED]  
[REDACTED]  
4 March 2024



# Organisation questionnaire response

**Privacy Setting:** I agree for my response to be published with my name and position withheld.

<b>What organisation do you represent?</b>  (required)	ANCAP Safety
<b>Please rank the proposed options in order of preference.</b>  (optional)	Option A - 0th, Option B - 0th, Option C - 0th
<b>Briefly, what are your reasons for your choice?</b>  (optional, 3000 character limit)	N/A
<b>Do you support the Government's preferred option (Option B)?</b>  (optional)	NULL
<b>Do you have any feedback on the analysis approach and key assumptions used?</b>  (optional, 3000 character limit)	<p>ANCAP supports the recommendation made in the consultation impact analysis paper which indicates that the availability of vehicles with the best emissions and safety technology should be considered a key principle of the scheme. Safety must always be a priority in the delivery of any regulation or policy in the road vehicle space. ANCAP notes the use of “average age of the vehicle fleet” as a success measure against this principle. However, ANCAP further notes that there is no guarantee that newer vehicles will meet the high safety standards that Australian expect from vehicle manufacturers. While most new vehicles sold in Australia do meet the high safety standards set by ANCAP, some new vehicles meet only the bare minimum legal requirements of the Australian Design Rules. In 2023, ANCAP tested and identified two brand new passenger vehicle models which scored zero stars – the lowest possible score under ANCAP’s testing and rating protocol. These vehicles are currently on sale in Australia. Australians expect a high degree of safety from new road vehicles. It is unfortunate that not all manufacturers are meeting those expectations. There is no guarantee that manufacturers will improve their safety performance in the future, even if they succeed in delivering vehicles that meet new emissions standards. ANCAP recommends that the Government consider whether a further success measure for this principle under the NVES should consider the proportion of vehicles sold in Australia with a current five-star safety rating from ANCAP, rather than simply considering vehicle age. Adopting this recommendation would align with the National Road Safety Strategy 2021-2030, which identifies “share of light vehicle fleet</p>



	that has an ANCAP 5-star rating within a 6-year date stamp” as the key safety performance indicator in the “safer vehicles” pillar.
<b>Briefly, describe how the NVES might impact your organisation</b>  (optional, 3000 character limit)	ANCAP is Australasia’s independent vehicle safety authority. It exists to reduce road trauma through the testing and promotion of safer vehicles and provides consumers with transparent advice through a safety rating system between 0 and 5 stars. ANCAP’s role is to encourage vehicle brands to design and build, and consumers to purchase and use, the safest vehicles possible. We set the benchmark to encourage vehicle brands to strive for the highest level of safety. We acknowledge those that meet or exceed top performance, and bring awareness to those that can improve. ANCAP is complementary to, and supports, the Australian Government’s regulatory requirements for new motor vehicles (the Australian Design Rules). ANCAP rates both categories of vehicles covered by the proposed NVES – light passenger vehicles and light commercial vehicles. The transition to low-emission vehicles is a once in a lifetime opportunity to improve the safety of the Australian vehicle fleet. ANCAP has tested and rated over 135 vehicles with battery electric, hybrid electric, or hydrogen powertrains. The majority of these vehicles have scored the maximum five-star safety rating from ANCAP, indicating a high and balanced level of safety performance across the four assessment pillars of adult occupant protection, child occupant protection, vulnerable road user protection, and safety assistant.
<b>Who should the regulated entity be?</b>  (optional, 3000 character limit)	N/A