

Better Streets

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[REDACTED]

8 October 2024

Department of Infrastructure, Transport, Regional Development,
Communications and the Arts

By email: CleanerCars@infrastructure.gov.au

To whom it may concern,

**RE: Proposed New Vehicle Efficiency Standard
(Exempt Vehicles) Determination 2024**

Better Streets is the peak body for accelerating the adoption of safe, healthy, people-friendly, climate-friendly streets, across the country. Our organisation is a registered charity, run by volunteers, experts, educators and advocates.

Better Streets is very concerned about the proposed exemption of Light NB1 Vehicles from the New Vehicle Efficiency Standard.

Recommendation:
Light NB1 vehicles (oversized utes) should be included in the NVES immediately without a transitional exemption period.

Any exemption creates a perverse economic incentive to sell more oversized utes at an increased rate during the transitional period and will create political pressure for that period to be extended indefinitely.

Taxation, profitability for manufacturers, and perceptions of safety for occupants, are leading to more people inappropriately purchasing oversized utes when lighter, less dangerous, less polluting vehicles could easily have been substituted.

Oversized utes kill and seriously injure more people.

Three recent studies highlight the substantial increased risk oversized utes create to other road users particularly people walking and cycling. In summary

- Justin Tyndall in his 2024 study “The effect of front-end vehicle height on pedestrian death risk” published in *Economics of Transportation*, Volume 37, March 2024, 100342 found that pedestrian deaths in the US have risen in recent years. Concurrently, US vehicles have increased in size, which may pose a safety risk for pedestrians. In particular, the increased height of vehicle front-ends may present a danger for pedestrians in a crash, as the point of vehicle contact is more likely to occur at the pedestrian’s chest or head. This study merges US crash data with a public data set on vehicle dimensions to test for the impact of vehicle height on the likelihood that a struck pedestrian dies. After controlling for crash characteristics, the study found that a 10 cm increase in the vehicle’s front-end height is associated with a 22% increase in fatality risk.
- The 2023 VIAS Institute study from France titled “Heavier, taller and more powerful cars for two-speed road safety?” (summary accessible at vias.be/fr/newsroom/des-voitures-plus-lourdes-plus-hautes-et-plus-puissantes-pour-une-securite-routiere-a-deux-vitesses-/) which examined all accidents that occurred between 2017 and 2021 concluded that while passengers on board larger vehicles are increasingly safe in the event of an accident, the opposite is the outcome for passengers in smaller vehicles and vulnerable road users. For example, in a collision between two cars, one of which weighs at least twice as much as the other, the occupants of the light vehicle are three times more likely to suffer serious injuries than when the two vehicles have a similar mass. Similarly, the risk of fatal injuries for a pedestrian or cyclist hit by a car with a bonnet 10 cm higher than average increases by 30%.
- Mickey Edwards and Daniel Leonard in their 2022 study “Effects of large vehicles on pedestrian and pedal cyclist injury severity” published in *Journal of Safety Research* Volume 82, September 2022, Pages 275-282 found fatal pedestrian and pedal cyclist crashes have been on the rise in the United States since 2009. This rise in fatalities coincides with the rise of large

vehicles on American roadways. Their results show that children are eight times more likely to die when struck by a SUV compared to those struck by a passenger car.

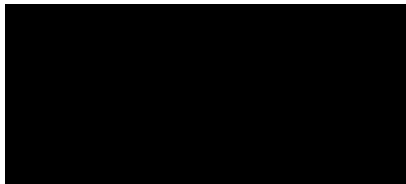
The exclusion of oversized utes is inconsistent with the NVES Principles

The principle of equity includes the requirement to “not unduly negatively impact any particular group of people or part of Australia”.

Creating an economic incentive for the continued or increased sale of oversized utes will negatively impact people who walk and cycle and other road users in smaller vehicles. For this reason the exemption should not proceed.

We look forward to hearing the result of your consultation. Please contact me if there is any aspect of this submission that you wish to discuss.

Sincerely,



Sara Stace

President of Better Streets

