Living Streets Canberra

Proposed New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024

SUBMISSION FROM LIVING STREETS CANBERRA

via email to CleanerCars@infrastructure.gov.au

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Living Streets Canberra

Living Streets Canberra is a grassroots organisation that works for everyone to be able to enjoy public spaces and walk* easily, safely and conveniently. We work for everyone – whether young or old, fast or slow; walking, sitting, commuting, shopping, between appointments, or out on the streets for exercise, leisure or pleasure.

Our work includes advocating for:

- ***all*** environs where people may use active transport (that is, human-powered transport such as walking, rolling or riding) to ***be*** – *and* ***feel*** – ***safe, accessible, comfortable and convenient*** – for ***everyone*** to use regardless of age, ability, gender, sexual orientation, race, culture, socioeconomic status or mode of transport. (The environs include the infrastructure, vehicles (particularly motor vehicles), and other people's behaviour.)

- mobility options – including all streets, paths, crossings, and public transport stops – to comply with or exceed anti-discrimination legislation and accessibility standards.

We want to see:

1. walking as the natural choice for everyday local journeys
2. Australia as an inviting, safe and comfortable place for people to be out and about, walking* and being in public spaces full of walking-friendly communities
3. people being supported and encouraged to choose to walk*, particularly for transport.

Living Streets Canberra works with various organisations and allies locally, nationally and internationally. Locally, these include Advocacy for Inclusion, Council on the Ageing ACT, ACT Council of Social Service, Pedal Power, Public Transport Association of Canberra, SEE-Change and Conservation Council ACT Region. Nationally, these include Better Streets and Climate Action Network Australia. Internationally, these include the International Federation of Pedestrians.

- Walking is natural...so walking should be a natural right.
- Every journey involves some walking.*
- Walking* is a legitimate use of public space.
- Walking* is an essential part of sustainable mobility.
- Walking* improves the health and liveability of communities.

* We focus on people who get about without a vehicle. When we use the term ‘walking’, we include any form of human-powered mobility that is not a bicycle: walking; using a wheelchair or other personal mobility device, including those with motors that can travel up to 10 km/h); pushing a pram; wheeling luggage; riding a scooter, skateboard, tricycle or rollerblades.

Introduction

Living Streets Canberra welcomes this opportunity to comment on the Proposed New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024.

Because every journey involves some walking,* this submission represents the interests of everyone who lives in or visits Australia. As at April 2024, this is over 26.7 million residents and 7.8 million visitors per year, a total of over 34.5 million people.

This proposal is of particular interest to us because the increasing use of large vehicles (as a result of incentives and fashion) undermines the efforts to reduce damage to the climate and increase road safety and active transport. Instead, it increases the problems.

This submission explains why the proposed exemption of Light NB1 Vehicles from the New Vehicle Efficiency Standard (NVES) would further exacerbate this situation and should therefore not proceed. We consider that vehicles with a gross weight of 3.5 to 4.5 tonnes should not be exempt from the NVES nor their inclusion in the NVES be delayed. Instead, this class should be included in emissions testing with a testing regime to be implemented over time. It is vital that Australia is able to effectively reduce and account for all vehicle emissions by including for this vehicle class in national vehicle efficiency measures.

We would also welcome the opportunity to discuss this submission further.

Context

Our views take account of, amongst other things, the broader context in which the NVES will work. These include:

- International, business and Australian (Commonwealth, State, Territory), New Zealand and Local Government commitments, policies and needs for:
  - reductions in air and water pollution
  - increasing road safety for all road users (particularly vulnerable road users), not just those in large vehicles
  - increasing health of people
  - reductions in and efficiency of use of natural resources
  - Increasing efficiency of land-use and health goals and improving safety

  (all of which will require significant shifts from private car use to active and public transport);

- International moves to safe, efficient and climate-neutral transport solutions;
- State, Territory and local government commitments to active travel and achieving zero net greenhouse gas emissions - noting that reducing greenhouse gas emissions from transport is a key component of achieving that and that Sydney, Canberra and Melbourne have all stated they want to be Australia's most walkable city;
- Australian commitments to road safety. These include national adoption of the Safe System approach and Vision Zero (zero road deaths) goal for transport, and the Commonwealth and other Australian jurisdictions working to give effect to it and other elements of the National Road Safety Strategy 2021-30 (which includes paths);
- Commitments, pressures and desires to improve health of individual people and to reduce demands on the health costs and systems; and
- Concerns about costs of living.

Focus on the biggest problems

The NVES must maintain its integrity in order to ensure that the above commitments are delivered.

As currently legislated, the NVES will deliver vital reductions in greenhouse gas emissions, healthier air quality, and more liveable streets as well as cost savings for Australian households, business and other organisations.

Climate

Overall, transport is Australia's third largest source of greenhouse gas emissions[1] and growing and is a major source of air, noise and water pollution and a major cause of trauma and poor health.

As Australia's greenhouse gas emissions from transport overwhelmingly come from road transport, and the vast majority of them from light [and increasingly medium] vehicles and in urban areas (in line with the population there) and

[1] Commonwealth of Australia (Climate Change Authority) [CCA] (2024) *2024 Issues paper: Targets, Pathways and Progress*, p25, https://storage.googleapis.com/files-au-climate/cca/p/prj2d3336e5a90d264a70605/page/Issues%20paper%20-%20Targets,%20Pathways%20and%20Progress.pdf, accessed on 21 July 2024.

growing,[2,3] it is clear that Australia's first and greatest effort needs to be in stemming these emissions.

Mode shift to active and public transport is the fastest and cheapest way to transport emissions than any other intervention - and Australia and Australians can reap the co-benefits of doing so.[4]

> *Facilitating greater use of active, shared and public transport can cut climate pollution further and faster [than electrifying vehicles] - and do so this decade - because the effects are seen immediately through reduced use of private motor vehicle travel.*
>
> *Living Streets Canberra submission, 2024*
> as cited by the Climate Change Authority[5]

The increase in vehicle size is reducing gains that have been made in fuel efficiency and emissions reduction and is discouraging mode shift for further emissions reduction.

Road safety

Getting more people to travel actively, more often, requires overcoming numerous barriers and consistently addressing several key issues in broader legal, policy and real-world contexts.

One of those key issues is safety.

Real and perceived danger is one of the biggest barriers to people choosing not to drive. All environs where people may use active travel (that is, human-powered transport such as walking, rolling or riding) should *be safe* – not safer – and *feel safe* – for everyone to use active travel, regardless of their age, ability, gender, culture,

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[2] 'Commonwealth of Australia (2024a) *Transport and Infrastructure Net Zero Consultation Roadmap*, Department of Infrastructure, Transport, Regional Development, Communications and the Arts [DITRDCA], May 2024, pp 3, 17, 18, 20, 34, https://www.infrastructure.gov.au/department/media/publications/transport-and-infrastructure-net-zero-consultation-roadmap, accessed 23 July 2024.

[3] Australian Bureau of Statistics (2024), *Historical population*, ABS website, 16 July 2024, https://www.abs.gov.au/statistics/people/population/historical-population/latest-release, accessed 5 August 2024.

[4] Living Streets Canberra (2024a) 'Transport & Infrastructure Net Zero Roadmap - Submission from Living Streets Canberra', 6 August 2024, https://drive.google.com/file/d/1j7R-gButhg8rsBy04_ICAfJGwZvygNyN/view

[5] Commonwealth of Australia (Climate Change Authority) (2024), *Sector Pathways Review*, p48, https://www.climatechangeauthority.gov.au/sites/default/files/documents/2024-09/2024SectorPathwaysReview.pdf, accessed 11 October 2024.

socio-economic status or mode of travel. The environs includes vehicles (particularly motor vehicles) as well as the infrastructure and other people's behaviour.[6]

Unfortunately, trauma and deaths from transport collisions are growing alongside climate damage from transport - in line with the increasing size of motor vehicles used for private personal transport.[7] The situation is particularly grim for people walking[8] and children under 5.

A substantial part of this increasing size comes from a shift from light passenger vehicles to light and medium commercial (goods) vehicles, which are in turn also increasing in size.

As researchers at the University of New South Wales point out:

> *[Larger] vehicles such as pickup trucks, large utes, minivans and SUVs tend to offer more protection to their occupants than smaller cars…[yet the attributes that provide that safety] increase the risks to occupants of smaller vehicles , pedestrians and cyclists…*
>
> *[Furthermore] surveys show drivers believe larger vehicles are safer. This has a major influence on deciding which car to buy'* [9]

An October 2024 (and possibly the first) aggregation of academic and available research on why the phenomenon of car bloat is so bad confirms that the increased size of vehicles driven around our streets reduces road safety because of their size and design leads to dangerous outcomes when they collide with people not in cars and with small cars:

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[6] Living Streets Canberra (2024b) 'Pathways to net zero emissions - Living Streets Canberra submission to Climate Change Authority', May 2024, https://drive.google.com/file/d/1ji6ApFNKBNIECuphnEc3_wYjShQgoAsS/view?usp=sharing

[7] DCCEEW (2022) *Australia's emissions projections 2022*, Department of Climate Change, Energy, the Environment and Water, Canberra, December, p35, CC BY 4.0, https://www.dcceew.gov.au/sites/default/files/documents/australias-emissions-projections-2022.pdf, accessed 21 July 2024.

[8] Davis, S. 2021. Bigger vehicles are directly resulting in more deaths of people walking. Smart Growth America, 12 April 2021, https://smartgrowthamerica.org/bigger-vehicles-are-directly-resulting-in-more-deaths-of-people-walking/, accessed 8 November 2023.

[9] Haghani, M and Ghaderi, H (2024) 'Big cars might make you feel safer. But here's how vehicle size impacts others in a crash', UNSW Newsroom, 21 June 2024, https://www.unsw.edu.au/newsroom/news/2024/06/big-cars-feel-safer-how-vehicle-size-impacts-others-crash, accessed 4 October 2024.

- Their height and weight relative to pedestrians
- Crash incompatibility with smaller cars
- Unique front-end geometry and stiffness [‘battering ram’ front design]
- Large blind zones [for drivers]
- Compounding impacts of speed and acceleration[10,11]

The increase in vehicle size is reducing gains that have been made in road safety.

Financial costs

When the NVES was introduced, the Government highlighted the huge financial savings it would bring to drivers.[12]

Larger vehicles cost more to buy and to run - particularly if they use climate-damaging and polluting fossil fuels. This adds to cost-of-living pressures.

Vehicles larger than necessary transfer extra costs to the rest of the community. Contrast this with smaller vehicles:

1. Fuel Efficiency and Environmental Impact

- **Smaller cars consume less fuel**: Due to their lighter weight and smaller engines, compact cars are generally more fuel-efficient, reducing overall fuel consumption. This means fewer greenhouse gas emissions, which helps combat climate change.
- **Lower carbon footprint**: Studies show that small cars' average carbon emissions per kilometre are significantly lower than larger SUVs or trucks. Encouraging more people to drive smaller cars can reduce a community's overall carbon footprint.

2. Congestion

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[10] See, for example, National Safety Commission (2024) ‘Massive Hazards: New RTZ Report on Light Trucks’, https://www.nsc.org/road/resources/road-to-zero/massive-hazards-new-rtz-report-on-light-trucks, accessed 9 October 2024

[11] Wilson, K (2024) ‘Six Reasons Why a Big Truck, SUV or Van is More Likely to Kill You in a Crash, *Streetsblog USA*, 8 October 2024, https://usa.streetsblog.org/2024/10/08/six-reasons-why-a-big-truck-suv-or-van-is-more-likely-to-kill-you-in-a-crash?, accessed 9 October 2024.

[12] See, for example, Belot, H (2024) ‘Fuel efficiency standards: Labor unveils proposal, highlighting petrol savings of $1,000 a year for motorists’, *The Guardian*, 4 February 2024, https://www.theguardian.com/australia-news/2024/feb/04/fuel-efficiency-standards-labor-unveils-proposal-highlighting-petrol-savings-of-1000-a-year-for-motorists, accessed 12 October 2024.

- **Smaller cars take up less road space**: Large vehicles contribute more to traffic congestion because they occupy more road space. Smaller cars help ease traffic flow, especially in urban areas with limited road infrastructure.
- **Parking efficiency**: Smaller cars also require less parking space. More cars can fit in the same parking area, reducing the need for expanded parking lots, which contributes to urban sprawl and land use challenges.

3. People walking, wheeling and riding

- **Lower risk of severe accidents**: Smaller cars are less likely to cause severe injury to pedestrians and cyclists in a collision. Larger vehicles, particularly SUVs and trucks, have higher front-end designs, increasing the risk of fatal head injuries in collisions with pedestrians.
- **Better driver visibility**: The lower height of smaller cars improves drivers' visibility, making it easier to see pedestrians and cyclists, particularly in busy urban environments.

4. Economic Efficiency

- **Lower vehicle costs**: Smaller cars are typically less expensive to purchase, maintain, and repair. This makes car ownership more accessible to a broader segment of the population, encouraging responsible vehicle ownership and reducing the economic burden on individuals.
- **Lower infrastructure wear and tear**: Large, heavy vehicles cause more wear and tear on roads, requiring more frequent repairs and maintenance. Smaller cars place less strain on road infrastructure, reducing the community's costs for road maintenance.

5. Energy Resource Conservation

- **Less fuel dependency**: Since smaller cars use less fuel, promoting them over larger vehicles reduces the community's reliance on fossil fuels. This contributes to energy security and lowers the impact of fuel price fluctuations.
- **Supports renewable energy transition**: Smaller electric vehicles (EVs) are more efficient and easier to integrate with renewable energy sources such as solar power. Smaller EVs can better utilise these resources as the community transitions to cleaner energy.

6. Improved Air Quality and Public Health

- **Fewer pollutants**: Smaller cars produce fewer pollutants, such as nitrogen oxides (NOx) and particulate matter (PM), which harm human health. Better air quality leads to lower rates of respiratory diseases and other pollution-related health issues.
- **Community health benefits**: Encouraging the use of smaller cars improves overall public health outcomes, reducing healthcare costs related to pollution-induced illnesses, particularly in densely populated areas.

7. Promotes Sustainable Urban Planning

- **Reduces sprawl**: Smaller cars, by requiring less space for driving and parking, contribute to more compact and efficient city layouts. This supports walkable cities, reduces sprawl, and encourages public transportation and cycling, leading to a more sustainable community design.

Increasing size and reducing aerodynamics of motor vehicles is bad for climate and people

The Transport and Infrastructure Net Zero Consultation Roadmap notes the increasing size of vehicles on our roads and streets as 'a potential challenge to decarbonising light vehicles…[because these larger] vehicles consume more energy and fuel per kilometre than smaller vehicles, resulting in higher emissions'.[13] Furthermore, current measurement standards used in Australia may be underestimating emissions.[14,15]

[13] Commonwealth of Australia (2024a) *Transport and Infrastructure Net Zero Consultation Roadmap*, Department of Infrastructure, Transport, Regional Development, Communications and the Arts [DITRDCA], May 2024, p38, https://www.infrastructure.gov.au/department/media/publications/transport-and-infrastructure-net-zero-consultation-roadmap, accessed 23 July 2024.
[14] Smit, R and Surawski, N (2022) 'We may be underestimating just how bad carbon-belching SUVs are for the climate – and for our health', *The Conversation*, 16 September 2022, https://theconversation.com/we-may-be-underestimating-just-how-bad-carbon-belching-suvs-are-for-the-climate-and-for-our-health-190743, accessed 12 October 2024.
[15] Smit, R (2024) 'At last, Australia has fuel efficiency standards – but they're weaker than they could have been', *The Conversation*, 21 May 2024, https://theconversation.com/at-last-australia-has-fuel-efficiency-standards-but-theyre-weaker-than-they-could-have-been-230302, accessed 12 October 2024.

Despite what the document says,[16] this is not simply an increasing preference. The drivers to bigger vehicles include financial incentives, heavy marketing (as the document notes) and a desire for protection of occupants in case of collision with other vehicles that are increasingly large (a vicious circle). The financial incentives include those provided by government directly (such as through taxation system[17], such as the instant asset write-off and fringe benefits tax) and indirectly (such as, in seeking passage of the NVES through Parliament, re-classifying large (heavier) vehicles primarily used for private personal transport as commercial (goods) vehicles - which reduces the pressure to quickly change the fuel efficiency of such vehicles, in turn reducing the costs of such changes being passed on to the buyers of those vehicles).

The proposed determination will further encourage use of these large vehicles. As at least one journalist has pointed out, 'Exemptions [of vehicles with a gross weight of more than 3.5 tonnes and less than 4.5 tonnes] may give consumers an incentive to purchase larger vehicles than they might otherwise have done'.[18]

Furthermore, **in light of the Context given at the start of this submission, there is no justification for excluding large vehicles (such as light NB1) from the NVES beyond the current adjustment period. Excluding these vehicles (which are some of the least efficient vehicles in Australia) counteracts the intended purposes of the NVES as well as the other commitments outlined above in Context.**

Emissions Standards should reduce emissions and can help reduce vehicle sizes and thus increase health, road safety, transport mode shift and liveability of urban areas.

Exempting vehicles, particularly those over 3.5 tonnes, from the NVES even temporarily is counterproductive to reducing emissions and costs and will continue to shift costs from drivers of larger vehicles to pedestrians, cyclists, and drivers of smaller vehicles.

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[16] Commonwealth of Australia (2024a) *Transport and Infrastructure Net Zero Consultation Roadmap*, Department of Infrastructure, Transport, Regional Development, Communications and the Arts [DITRDCA], May 2024, p38, https://www.infrastructure.gov.au/department/media/publications/transport-and-infrastructure-net-zero-consultation-roadmap, accessed 23 July 2024.

[17] See, for example, Thrower, J (2024) 'SUVs and utes are no longer just work vehicles, but tax-subsidised behemoths', The Australia Institute, 12 January 2024, https://australiainstitute.org.au/post/suvs-and-utes-are-no-longer-just-work-vehicles-but-tax-subsidised-behemoths/, accessed 12 October 2024.

[18] Hannam, P (2024) 'Gap in Albanese government's new fuel efficiency rules means 'biggest, dirtiest polluters' exempt', *The Guardian*, 4 October 2024, https://www.theguardian.com/australia-news/2024/oct/04/fuel-efficiency-standard-laws-nves-albanese-government-exemptions, accessed 7 October 2024.

We agree with Better Streets that there should be no exemptions from emissions standards.

<u>Recommendation 1</u>: The Australian Government ensure that policy-making for transport and vehicles is based on commitments and evidence aligned with maximising health of people and environment in a changing climate, safety and inclusion of the most vulnerable people, and limiting global warming to 1.5˚C. Do not entertain pressure from the motor vehicle industry for exemptions and delays to further action towards these goals.

<u>Recommendation 2</u>: At very least, the Australian Government keep the NVES as it is and preferably increase its ambition (such as by removing the transition period for light NB1 vehicles) in line with the climate necessity and to catch up with other developed countries.

The increasing size of vehicles being used for personal passenger transport has implications for emissions reduction beyond the direct emissions from those vehicles.

The size and design of those vehicles:

- is making our streets and roads more dangerous for people not in the vehicles (particularly people walking, wheeling, riding) as well as those in smaller, more aerodynamic and energy-efficient vehicles,[19]
- increases the wear and tear on road surfaces
- increases demand for hard surfaces and for stronger buildings to accommodate them.

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[19] See, for example:
Krizek, KJ (2023) 'Ever-larger cars and trucks are causing a safety crisis on US streets – here's how communities can fight back', *The Conversation,* 2 August 2023, https://theconversation.com/ever-larger-cars-and-trucks-are-causing-a-safety-crisis-on-us-streets-heres-how-communities-can-fight-back-206382, accessed 5 August 2024;
Newstead, S and Logan, D (2018) 'I've always wondered: are SUVs and 4WDs safer than other cars?', *The Conversation,* 24 September 2018, https://theconversation.com/ive-always-wondered-are-suvs-and-4wds-safer-than-other-cars-98559, accessed 5 August 2024;
Nicholas, J (2023) 'SUVs are more popular than ever in Australia – but there is a downside', *The Guardian* (Australian ed.), 19 March 2023, https://www.theguardian.com/news/datablog/2023/mar/19/suvs-are-more-popular-than-ever-in-australia-but-there-is-a-downside, accessed 5 August 2024.
SGFleet (n.d.) 'Are bigger cars making us less safe?', https://drivinginsights.com.au/novated-leasing/are-bigger-cars-making-us-less-safe/, accessed 5 August 2024; and
Tyndall, J (2021) 'Pedestrian deaths and large vehicles', *Economics of Transportation*, 26–27:100219, https://doi.org/10.1016/j.ecotra.2021.100219, (https://www.sciencedirect.com/science/article/pii/S2212012221000241) accessed 5 August 2024.

These all work against reducing emissions.

The increased danger to people not inside these large vehicles is a potent disincentive to walking, wheeling and riding to get around; that is, to shift transport modes. (It is also a disincentive to people buying smaller, more efficient and climate-neutral cars.)

A recent, large study by a major Belgian road safety institute (VIAS Institute) explains causes of the problem as follows:

> ‘*In recent years, cars have become heavier, taller and more powerful. While passengers on board are increasingly safe in the event of an accident, the same does not apply to passengers of smaller vehicles and vulnerable users. Thus, in a collision between two cars, one of which weighs at least twice the other, the occupants of the light vehicle are 3 times more likely to suffer serious injuries than when both vehicles have a similar mass. Similarly, the risk of fatal injuries to a pedestrian or cyclist hit by a car whose bonnet is 10 cm higher than the average, increases by 30%. These are the findings of a new study by the Vias Institute that screened all accidents between 2017 and 2021.’*
>
> ***‘Characteristics of vehicles that have an impact on the severity of injuries in the event of an accident [*include*]:***
>
> - *Mass of vehicle*
>
> *The mass of the vehicle has both a protective and “aggressive” effect: the occupants of heavier vehicles are less likely to be seriously or fatally injured, while their opponents are more likely to suffer serious or fatal injuries.*
>
> - *Height of bonnet*
>
> *The risk of fatal injuries among vulnerable users is greater as the bonnet height of the vehicle hitting them increases. Thus, a pedestrian or a cyclist hit by a car with a bonnet 90 cm high runs a risk of 30% higher fatal injury than if struck by a vehicle with a hood 10 cm lower.*
>
> - *Pick-up*
>
> *The occupants of a pick-up truck are less likely to be serious or fatally injured than the occupants of a car, while their opponents are more likely to be seriously injured or fatally injured than those hit by a car. Thus, the risk of serious injury:*

- *decreases by 65% for the occupants of a pick-up truck;*
- *increases by 50% for the occupants of a car involved in an accident with a pick-up truck.*

For a pedestrian or cyclist hit by a pickup truck, the risk of serious injury increases by 90%; the risk of fatal injuries by almost 200%.

- *SUV*

The occupants of an SUV are less likely to be serious or fatal injury than the occupants of a car. The occupants of a car involved in an accident with an SUV have a higher risk of serious injuries. Thus, the risk of serious injury:

- *decreases by 25% for the occupants of an SUV;*
- *increases by 20% for the occupants of a car involved in an accident with an SUV.*

Evolution of vehicle characteristics

Over the last 20 years, the characteristics of cars have evolved increasingly to the advantage of the occupants and to the detriment of the opponents. Thus:

- *the average mass of cars increased by almost 30% (from 1186 kg in 2000 to 1521 kg in 2021);*
- *the average power of cars increased by 60% (from 65 kW in 2000 to 103 kW in 2021);*
- *the average height of the car hood increased by 15% (from 73 cm to 83 cm).*[20]

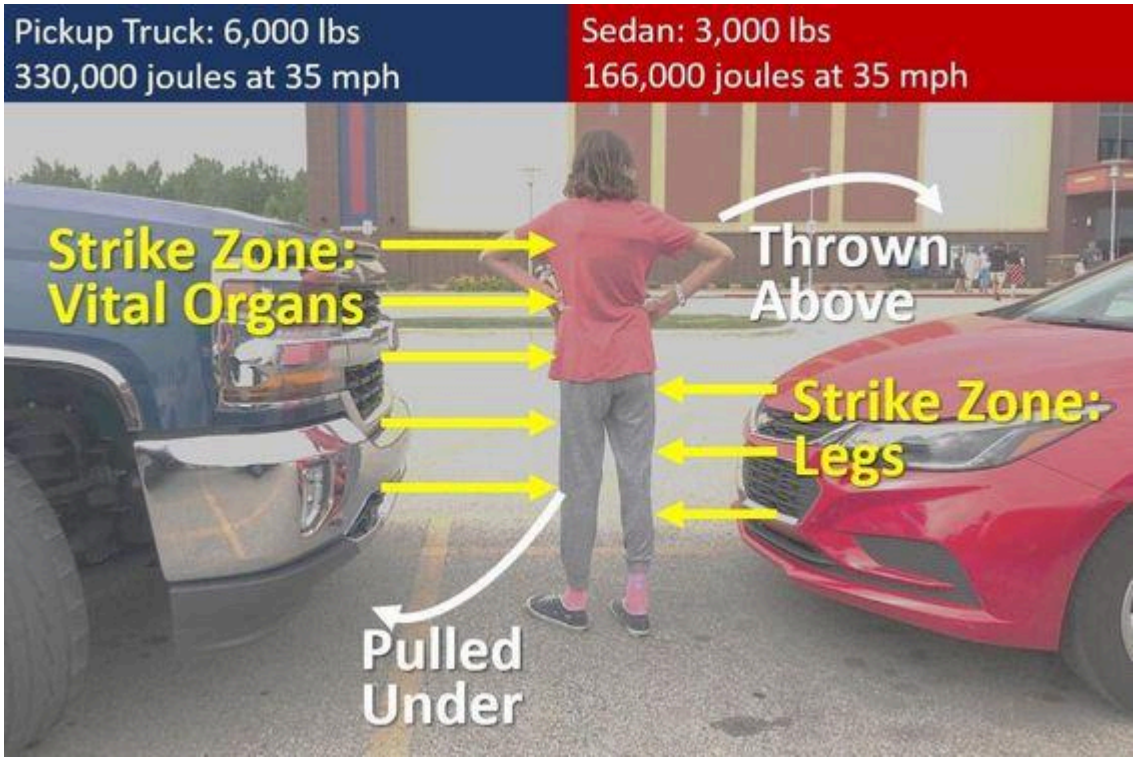
Vehicle design needs to be safer for the climate and people outside vehicles

The Australian New Car Assessment Program (ANCAP) says that protection of people outside the vehicle is one of the four key areas of assessment.[21]

[20] Godart, B (2023) *Des voitures plus lourdes, plus hautes et plus puissantes pour une sécurité routière à deux vitesses? [Heavier, taller and more powerful cars for two-speed road safety?]*, 30 August 2023, VIAS Institute, https://www.vias.be/fr/newsroom/des-voitures-plus-lourdes-plus-hautes-et-plus-puissantes-pour-une-securite-routiere-a-deux-vitesses-/, accessed 17 June 2024.

[21] ANCAP (n.d.) *How are cars tested for safety?*, ANCAP website, https://www.ancap.com.au/how-are-cars-tested-for-safety, accessed 4 August 2024.

However, it is clear from vehicles on the road, ANCAP ratings, crash results, safety experts, local governments, and advocates from around the world that the new car ratings systems and vehicle design standards in Australia and other countries need to be updated so that they do not continue to give 'misleadingly high safety ratings to the most dangerous vehicles'.[22]



For everyone's safety, and to encourage more people to change to more benign and climate-, environmentally- and socially-friendly modes of transport, the design of at least the majority of vehicles on our streets and roads needs to change.

As America Walks says:

> *[We need] safer vehicle design standards that tackle directly why so many people outside of cars are hurt or killed on our streets. We've required safety features that protect vehicle occupants for decades. It's time to put similar protections into place that save the lives of people outside cars.*

[22] National Association of City Transportation Officials (n.d.) *Vehicle design,* NACTO website, https://nacto.org/program/vehicle-design/, accessed 3 August 2024

What needs to change? We know that excessive vehicle size, poor visibility from the driver's seat, and driving over the speed limit all contribute to dangerous conditions. SUVs and pickup trucks when they hit a pedestrian are two to three times more likely to kill that person than a passenger car, especially when driving over the speed limit. And the blind spots of SUVs and pickup trucks make their drivers three to four times more likely to hit a pedestrian when turning.

Creating safer vehicles requires a comprehensive approach. Technologies like pedestrian automatic emergency braking and intelligent speed assistance can mitigate the danger caused by vehicle design flaws, but the flaws themselves must be addressed as well. We call for smaller and safer hoods and bumpers that reduce the impact of being struck and direct visibility requirements that allow drivers to see people outside of vehicles, without having to monitor a separate screen.[23]

Such work is not starting from scratch, thanks to researchers such as those at the Monash University Accident Research Centre.[24]

<u>Recommendation 3</u>: The Australian Government replace with disincentives (or at least remove) the incentives, marketing and loopholes that encourage people to choose (particularly for personal passenger travel) larger cars, SUVs and light and medium commercial vehicles that are (increasingly) large and less aerodynamic and so are unsafe for people outside motor vehicles (and in small vehicles) as well as bad for the climate and the liveability of our cities.

<u>Recommendation 4</u>: The Australian Government work with government transport and industry officials and researchers, community organisations, unions, heavy vehicle manufacturers and others to revise design standards for vehicles, particularly light and medium vehicles, in Australia so that they protect people outside of vehicles and in smaller vehicles, as well as those inside vehicles.

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[23] America Walks (2008-2024) *Safer Vehicles for Pedestrians*, America Walks website, https://americawalks.org/campaigns/safer-vehicles-for-pedestrians/,

[24] Newstead, S and Logan, D (2018) 'I've always wondered: are SUVs and 4WDs safer than other cars?', *The Conversation,* 24 September 2018, https://theconversation.com/ive-always-wondered-are-suvs-and-4wds-safer-than-other-cars-98559, accessed 5 August 2024.