



Australian Federation of
Disability Organisations

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

Lodged via: <https://www.infrastructure.gov.au/have-your-say/acoustic-vehicle-alerting-systems-electric-vehicles>

To whom it may concern

Re: Acoustic Vehicle Alerting Systems for Electric Vehicles

The Australian Federation of Disability Organisations (AFDO) has been the recognised national peak organisation representing people with lived experience of disability since 2003. Our mission is to champion the rights of people with disability in Australia and support them to participate fully in all aspects of Australian life.

We are writing in response to the Consultation Impact Analysis pertaining to Acoustic Vehicle Alerting Systems (AVAS), published by the Department in March 2023. AFDO strongly recommends AVAS be mandated for all electric, hydrogen fuel cell and hybrid vehicles in Australia – acknowledging that these systems have already been mandated for major overseas markets including the European Union, the United Kingdom, the United States, Japan, South Korea and China for many years. Bringing Australia up to the same standard will ensure we are meeting our obligations under Article 9 of the Convention on the Rights of Persons with Disabilities, which requires people with disability to be able to access the physical environment, including roads and pedestrian areas, on an equal basis with others.

While quiet electric, hydrogen fuel cell and hybrid vehicles can create a safety risk for many of the 4.4 million Australians with disability, those who are blind or vision impaired are disproportionately impacted. As such, we recognise our colleagues at Blind Citizens Australia as the experts on this topic – particularly given they have been advocating around this issue for an extended period of time. We have reviewed Blind Citizens Australia's submission to this consultation process and endorse the views and recommendations contained throughout. We have provided the recommendations from Blind Citizens Australia's submission again below for ease of reference, noting that they have our full support:

1. *All electric, hydrogen fuel cell and hybrid vehicles registered in Australia be installed with an Acoustic Vehicle Altering System (AVAS), without a pause function or off-switch.*
2. *AVAS be operational at the range of greater than 0 km/h up to and inclusive 30 km/h, as well as when the vehicle is reversing, stationary or idling.*
3. *AVAS produce sounds similar to those of a vehicle with an internal combustion engine (ICE).*
4. *If a national AVAS framework permits non-traditional sounds, the Department must fund and collaborate with state and territory road safety commissions on an extensive awareness campaign.*
5. *Banning external speakers and customisable sounds capable of obscuring audible warnings for pedestrians.*
6. *Recognition of the immense benefits of AVAS in human, economic, health and social terms; that the costs of AVAS are reasonable and worth paying to save lives; and that the mandatory fitment of AVAS is therefore sensible and compassionate public policy.*
7. *All electric trucks and buses registered in Australia be installed with an AVAS, without a pause function or off-switch.*
8. *All e-scooters and other Personal Mobility Devices (PMDs) sold in Australia be installed with an AVAS, without a pause function or off-switch.*

Thank you for taking the time to review our letter. We hope this consultation process will lead to changes that will make Australian roads safer for all pedestrians – including those with disability. Should you require any further information in relation to the content of this letter, please do not hesitate to get in touch.

Yours Sincerely

Insert signature

Ross Joyce
Chief Executive Officer