

Director
Vehicle Standards
DITRDCSA
Standards@infrastructure.gov.au

Dear Director,

RE: Advanced Emergency Braking for Passenger Vehicles and Light Goods Vehicles –
Australian Design Rule 98/02

The Australasian College of Road Safety (ACRS) is the region's peak membership association for road safety with a vision of eliminating death and serious injury on the road. Our members include experts from all areas of road safety including policy makers, health and transport professionals, academics, community organisations, researchers, federal, state and local government agencies, private companies and members of the public. The purpose of the College is to support our members in their efforts to eliminate serious road trauma through knowledge sharing, professional development, networking and advocacy.

ACRS believes that we should prevent all fatal and serious injuries on our roads; the road traffic system must be made safe for all road users; system designers should aim to prevent human error and mitigate its consequences; life and health are not exchangeable for other benefits in society; and that all ACRS policy positions must be evidence based.

The consultation seeks feedback on the proposal to introduce Australian Design Rule (ADR) 98/02 mandating the fitment of Advanced Emergency Braking Systems (AEBS) in passenger vehicles and light goods vehicles entering the Australian market. The AEBS automatically detects an imminent forward collision and activates the vehicle braking system to decelerate the vehicle with the purpose of avoiding or mitigating a collision. This safety measure can mitigate the severity of a collision with a bicycle.

The consultation notes that ADR 98/02 seeks to harmonise with the technical requirements of the 02 series of amendments to the United Nations (UN) Regulation No. 152 – Uniform provisions concerning the approval of motor vehicles with regard to the AEBS.

The ACRS welcome this consultation and strongly supports the implementation of ADR 98/02.

However, we are concerned that the proposal does not include key elements which would further improve road safety.

- All light goods vehicles should be included – UN Regulation No. 152 only requires passenger cars to meet the requirements for in-lane forward collision
- Impacts with more rigid and heavier vehicles including light and heavy commercial vehicles should be included in the performance requirements which currently would be restricted to passenger vehicles

- Best practice currently includes the ability to address the risk of impacts across the entire front of the vehicle and when turning or following a curve. This should be included rather than restricting to travelling straight on with impacts not more than 0.2m either side of the vehicle longitudinal centre plane.
- Best practice currently includes the ability to detect and mitigate crashes with bicycles travelling in the same lane as the test vehicle. This should be included rather than restricting to bicycles crossing at 90 degrees to the direction of vehicle travel.
- Pedestrian safety should be considered equally alongside cyclist safety.

ACRS recommends that the above enhancements be implemented and there be automatic adoption of further enhancements to safety performant requirements for this ADR.

ACRS is grateful for the opportunity to comment on this consultation and contribute to improving road safety in Australia. Please contact me if you need any further information.

Yours sincerely,



Dr Ingrid Johnston
CEO
Australasian College of Road Safety

27 November 2025