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27 March 2023

Dear Consultation Team,

Re: Consultation on National Safety Standards for Electric and Hydrogen-Fuelled Vehicles

According to the consultation website, the proposed Australian Design Rules (ADRs) 109/00 and 110/00 are designed to prescribe “safety requirements for electric vehicles (EVs) and hydrogen-fuelled cell vehicles (HFCVs) across the majority of road vehicles, such as cars, SUVs, utility vehicles, commercial vehicles and buses, but excluding motorcycles and trikes”<sup>1</sup>.

The exclusion of motorcycles and trikes is not further explained in the documentation available, and yet to the best of our knowledge, there is no similar ADR for electric motorcycles and safety standards.

In 2021 there were 913,803 motorcycles registered throughout Australia<sup>2</sup>. Interest in electric motorcycles is evident in Australia and globally. Several models of electric motorbikes are currently available in Australia<sup>3</sup>, and at least one local company assembling them here from parts manufactured overseas<sup>4</sup>. An international consortium has been formed for swappable batteries for electric motorcycles.<sup>5</sup>

Electric motorcycles are a reality in Australia, and their safety needs to be considered.

The Australasian College of Road Safety 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.

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<sup>1</sup> <https://www.infrastructure.gov.au/have-your-say/national-safety-standards-electric-and-hydrogen-fuelled-vehicles>

<sup>2</sup> <https://www.abs.gov.au/statistics/industry/tourism-and-transport/motor-vehicle-census-australia/latest-release>

<sup>3</sup> <https://australianelectricmotorco.com/electric-motorcycles-coming-to-australia/>

<sup>4</sup> <https://www.savicmotorcycles.com>

<sup>5</sup> <https://www.sb-mc.net>

Our objectives include the promotion of road safety as a critical organisational objective within government, business and the community; the promotion and advocacy of policies and practices that support harm elimination; the improvement of relative safety outcomes for vulnerable demographic and user groups within the community; the promotion of post-crash policies and practices; and the promotion of a collegiate climate among all those with responsibilities for and working in road safety.

The College believes 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 College policy positions must be evidence based.

ACRS appreciates the opportunity to make this submission and contribute to improving road safety. Please contact me should you require any further information.

Yours sincerely,



Dr Ingrid Johnston  
CEO  
Australasian College of Road Safety