



EXPOSURE DRAFT ADRs 97/00 AND 35/07

AUSTRALIAN TRUCKING ASSOCIATION SUBMISSION 25 SEPTEMBER 2020

About the Australian Trucking Association

1. The Australian Trucking Association and its member associations collectively represent 50,000 businesses and 200,000 people in the Australian trucking industry. Together we are committed to safety, professionalism and viability.

Introduction

2. On 19 August 2020, the Department of Infrastructure, Transport, Regional Development and Cities released exposure drafts of proposed ADRs 97/00 and 35/07.
3. Draft ADR 97/00 would mandate advanced emergency braking for new medium and heavy trucks. Draft ADR 35/07 would extend the existing ESC requirements in ADR 35/06 to cover new rigid trucks.
4. To develop this response, the ATA obtained independent engineering advice from Smedley's Engineers and held member meetings on Monday 21 September and Friday 25 September 2020.

Rigid trucks

5. The provisions of the exposure draft of ADR 97/00 relating to mandatory AEB for new rigid trucks and the exposure draft of ADR 35/07 do not in the ATA's view require amendment.

Prime movers

6. The provisions of the exposure draft of ADR 97/00 relating to mandatory AEB for new prime movers should be amended to add a performance-based requirement for the application of the service brake control line for non-ABS equipped trailers.
7. The proposed requirement would create uniformity in the performance outcomes from AEBS when towing non-ABS trailers. The broad approach implemented by truck OEMs could cause confusion or safety issues with drivers becoming familiar with one AEBS functionality and then changing to vehicles with a different AEBS functionality.
8. The ATA would seek to work with manufacturers and other interest groups to provide a proposed standard for Government consideration.

9. The Government should further develop and publish an indicative timeframe for requiring integrated camera and other technology in any AEB mandate, following the resolution of [6]-[8].

Industry and enforcement agency communications

10. AEB is one of the least understood heavy vehicle safety technologies. 38 per cent of the respondents to the NHVR's 2020 heavy vehicle industry safety survey said they did not understand the technology.¹
11. The Government should work with industry to develop a wide-ranging communication campaign, including videos, driver demonstration days and/or driver training events, to support the dissemination of information about:
 - a. warning cascades
 - b. how AEBS strategies minimise false warnings or brake interventions
 - c. driver override functionality of AEBS intervention
 - d. added functionality of AEBS available in addition to ADR 97/00 such as pedestrian and/or object recognition
 - e. the compatibility of bullbars with AEB sensors
 - f. the operation of AEBS in rural environments.
12. The information campaign should include liaison with enforcement agencies.

ATA contact

13. The ATA contact for this submission is Bob Woodward, Chief Engineer, at bob.woodward@truck.net.au or 02 6253 6904.

¹ NHVR, [Heavy vehicle industry safety survey 2020](#). Fact sheet.