



Date: 26th May 2023

To: Department of Infrastructure, Transport, Regional Development, Communications and the Arts

Re: Acoustic vehicle alerting systems for electric vehicles

To whom it concerns,

The Australian Electric Vehicle Association Ltd (AEVA) is a volunteer-run, not-for-profit organisation dedicated to advancing the case for full electrification of Australia's transport networks. We primarily represent current and aspiring EV drivers and riders and assist with the dissemination of knowledge through lived experience. We thank the commonwealth government for the opportunity to contribute to this discussion about acoustic warning systems for EVs.

The AEVA recognizes the concerns held by vision impaired pedestrians, and that not everyone is able to make use of audio cues normally used to enhance one's awareness of their surroundings, particularly in an urban environment. We also recognize that electric cars and motorcycles are by their nature, substantially quieter in operation, and produce very little noise at speeds lower than 20 km/h. At higher road speeds, the wind rush and road noise are more obvious.

We believe that the reduction in urban noise through increased use of electric cars, busses, bikes and motorcycles *is a net benefit to society*, so efforts to add noise to these transport solutions seems somewhat ironic. There has been a trend in recent public discourse where vulnerable victims of road crashes are blamed for their own predicaments – cyclists are chided for not wearing high-visibility clothing, and pedestrians are scorned for not looking up from their phone. When really, the driver of the more harm-inflicting vehicle (typically a car) is ultimately responsible for not driving in such a way that puts cyclists and pedestrians at risk.

With this in mind, we feel that the driver of an EV, or any vehicles for that matter, has a responsibility to drive in a careful, predictable manner, fully aware of their surroundings. If a pedestrian should cross their path unaware of the vehicle, the driver is obliged to avoid them regardless of whether the pedestrian noticed the vehicle or not.

Many new EVs come with an acoustic warning which activates upon start-up and sounds at low speeds – generally a low frequency 'wooshy' noise discernable by most age groups. In some models, the driver can disable this noise after starting the vehicle but may reactivate it later. We feel that this is the best arrangement, as the driver may then choose to enable it if the conditions make sense (say in a busy shared zone or mall) or not (in a vacant laneway).

AEVA would be happy with an ADR mandating that all new light vehicles to come with an acoustic warning system for low-speed driving, but that this warning system may be activated, or de-activated by the driver whenever the conditions make sense.

If you have any further queries or concerns, please feel free to contact us.

Sincerely,



Chris Jones,

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