

APPENDIX 16 — TECHNICAL LIAISON GROUP (TLG)

Organisation

Manufacturer Representatives

Australian Road Transport Suppliers Association
Bus Industry Confederation
Caravan Industry Association of Australia Ltd
Commercial Vehicle Industry Association of Australia
Federal Chamber of Automotive Industries
Federation of Automotive Product Manufacturers
Heavy Vehicle Industry Association
Truck Industry Council

Consumer Representatives

Australian Automobile Association
Australian Automotive Aftermarket Association
Australian Motorcycle Council
Australian Trucking Association

Government Representatives

Department of Infrastructure, Regional Development and Cities, Australian Government
Department of Infrastructure, Energy and Resources, Tasmania
Department of Infrastructure, Planning and Logistics, Northern Territory
Department of Planning, Transport and Infrastructure, South Australia
Department of Transport, Western Australia
Department of Transport and Main Roads, Queensland
National Heavy Vehicle Regulator
New Zealand Transport Agency
Roads and Maritime Services, New South Wales
Transport for NSW, Centre for Road Safety, New South Wales
Transport Regulation, Justice & Community Safety, Australian Capital Territory
VicRoads, Victoria

Inter Governmental Agency

National Transport Commission

APPENDIX 17 — NHVBS PHASE II INDUSTRY REFERENCE GROUP (IRG)

NHVBS Phase II IRG Member Organisations

Industry (manufacturer) Representatives

Australian Road Transport Suppliers Association
Bus Industry Confederation
Commercial Vehicle Industry Association of Australia
Truck Industry Council
Heavy Vehicle Industry Australia

Operator Representatives

Australian Livestock and Rural Transporters' Association
Australian Trucking Association

Government Representatives

Department of Infrastructure, Regional Development and Cities, Australian Government
National Heavy Vehicle Regulator

APPENDIX 18 — SUMMARY OF PUBLIC COMMENTS

Correspondent	Comment Summary	Departmental Response
Air Brake Systems Pty Ltd	<ol style="list-style-type: none">1. Supports Option 6c in the consultation RIS.2. Supports mandating of automatic slack adjusters on all trailer brake systems.3. Notes LPV and standard brake systems are often upgraded to electronic brake systems.4. Understands practicalities of the proposal to exempt converter dollies from mandatory fitment of ABS and RSC. Notes that there is a much better safety outcome when converter dollies are also controlled by an electronic brake system.5. Supports the proposed timeline for the implementation of ADR 38/05.	<ol style="list-style-type: none">1. Agreed.2. Agreed.3. Noted.4. Noted.5. Agreed.
Australian Livestock and Rural Transporters' Association (ALRTA)	<ol style="list-style-type: none">1. Considers that the ATA submission represents the ALRTA position on the consultation RIS proposals.	<ol style="list-style-type: none">1. Noted.

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	<p>2. In summary, supports:</p> <ul style="list-style-type: none"> a. mandating ESC for trucks and RSC for trailers (including on spring suspension); b. a specific exemption for converter dollies (with a requirement for through wiring); c. a requirement for road train rated equipment to supply 24V; d. a manual off-switch that re-engages at speeds above 40 km/h; and e. automatic slack adjusters. 	<p>2. Notes the responses to the RIS questions and support for these changes.</p>
	<p>3. Recommends that the Australian Government adopt Option 6a, rather than the option recommended in the consultation RIS (Option 6c). Option 6a will deliver the safest outcome, with a very reasonable BCR of 1.99 and expected net benefits of \$167m.</p>	<p>3. Acknowledges the decrease in trauma under Option 6a relative to Options 6b and 6c. However, under the Australian Government Guide to Regulation, the policy option offering the greatest net benefit should always be the recommended option.</p> <p>Further analysis and consultation was conducted to extend to short wheelbase NC rigid (see Appendix 19).</p> <p>ESC on heavy rigid vehicles may be included as part of a package when AEBs on heavy vehicles is considered (proposed action item under the 2018-2020 NRSAP).</p>
<p>Australian Trucking Association (ATA)</p>	<p>1. Supports Option 6a in the consultation RIS, because it is the option that would save the greatest number of lives and avoid the greatest number of accidents, and would do so at a reasonable cost.</p>	<p>1. Acknowledges the decrease in trauma under Option 6a relative to Options 6b and 6c. However, under the Australian Government Guide to Regulation, the policy option offering the greatest net benefit should always be the recommended option.</p>

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2.	Would accept a reasonable extension of the implementation timetable for category NB2 vehicles.	2. Further analysis and consultation was conducted to extend to short wheelbase NC rigid (see Appendix 19).
3.	Recommends the final version of the RIS, value the cost of a serious injury at \$392,967, consistent with the willingness-to-pay based approach endorsed by governments.	ESC on heavy rigid vehicles may be included as part of a package when AEBs on heavy vehicles is considered (proposed action item under the 2018-2020 National Road Safety Action Plan (NRSAP)). 3. The approach to cost of life and injury values used has been established through previous RISs including acceptance of these figures and methodology by OBPR. This is reviewed during each RIS. For this RIS, additional consideration was given to assessing the cost of heavy vehicles.
4.	Recommends the Government, if it were to decide to go ahead with Options 6b or 6c, put in place controls to reduce the risk of loss of control/rollover crashes involving new trucks not covered by the mandate. This could, for example, include the awareness campaign envisaged in Option 2 in the consultation RIS.	The suggested change in serious injury value is based on the sensitivity analysis in BITRE (2009). Further analysis was conducted using this value in Appendix 19. This change does not affect the ranking of Option 6a, which remains the value with the lowest net benefit. 4. Noted. Item 9 of the NRSAP 2015-2017 is to promote the uptake of new vehicle technologies with high safety potential. This is likely to be continued in the next action plan, with action from relevant stakeholders required to maximise the potential of this item.

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5.	<p>Notes that Australia's work health and safety laws generally require businesses to eliminate or minimise risk in so far as is reasonably practicable, that the Heavy Vehicle National Law will include a comparable requirement from mid-2018, and that cost must be grossly disproportionate to the risk for a control measure to be regarded as not reasonably practicable.</p>	5. Noted.
6.	<p>Considers that a typical work health and safety risk assessment, as well as the UK treasury framework for assessing proposals that affect public safety, would suggest that the risk of a rollover/loss of control crash involving a rigid truck is sufficiently high to warrant control measures to reduce it in so far as is reasonably practicable. Acknowledges that regulatory decisions are not within the ambit of work health and safety law, but considers that this approach can support government decision making.</p>	6. Noted. As with the requirements under the NHVL, vehicle/fleet owners should assess the risks of operating a vehicle and their duties under legislation. This would include, where necessary, to introduce engineering solutions regardless of whether a particular technology is mandated.
7.	<p>Recommends the National Heavy Vehicle Inspection Manual be amended before ADRs 35/06 and 38/05 come into force, to provide inspectors and the industry with guidance that:</p> <ul style="list-style-type: none">a. new trucks and trailers used in road train combinations must be wired for 24V power; and	7. This would be a consideration for the NHVR. It has been involved in the IRG, and is consulted through SVSEG/SVTG and TLG/AMVCB on ADR changes.

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	<p>b. the power cables connecting new trucks and trailers in road train combinations must be configured and connected to supply 24V power.</p>	
	<p>8. Supports exemption from mandatory fitment of RSC for converter dollies. Suggests there is a safety case for requiring all of the units in PBS A-Doubles to be fitted with ABS/RSC, including converter dollies. The risk of a rollover or a loss of control crash faced by these A-Doubles could be treated by amending the PBS rules for new designs and new vehicles built under existing designs rather than altering the exemption in draft ADR 38/05.</p>	<p>8. Noted. This would be a consideration for the PBS authorities. Agree with leaving the exemption as is, until further work can be done on assessing braking for converter dollies.</p>
	<p>9. Supports mandating of RSC on trailers with air suspension as well as trailers with steel spring suspension. Notes there are steel spring trailers with stability control systems operating successfully in Australia already.</p>	<p>9. Notes the response to the RIS question. This acknowledges that there is a need for RSC on steel sprung trailers in Australia.</p>
	<p>10. Supports mandating automatic slack adjusters on all trailers.</p>	<p>10. Notes the response to the RIS question and support for this change.</p>
	<p>11. Supports the allowance provided in the draft ADRs for a manual ESC off-switch that re-engages at speeds above 40 km/h. Considers this function will help truck drivers negotiate creeks, paddocks and tight turns through farm gates.</p>	<p>11. Notes the response to the RIS questions and support for the inclusion of switch to aid operators in certain low speed manoeuvres.</p>

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Department of Planning, Transport and Infrastructure, South Australia	<ol style="list-style-type: none"> Supports adoption of Option 6c in the consultation RIS. Although Option 6a, which provides the greatest road safety benefit, would ultimately be the preferred option, understands and supports the reasoning behind the recommendation for Option 6c. Supports the proposal to require RSC on trailers with air suspension as well as other types of suspension (such as steel springs). Notes trailers are a common initiator of heavy vehicle rollovers. Does not believe there are any significant barriers to fitting RSC to new trailers, including those with steel springs. Supports the proposal to extend the requirement for automatic slack adjusters to all category TC and TD trailers. Advises that Vehicle Inspectors regularly report occurrences of poor manual brake adjustment on heavy trailers. Notes that 'prime mover' is not an ADR vehicle category. Would prefer requirements to cover all category NC vehicles. 	<ol style="list-style-type: none"> Agreed Notes the response to the RIS question. This acknowledges that there is a need for RSC on steel sprung trailers in Australia. Notes the response to the RIS question and support for this change. Noted. This would be similar to the Option 6b scenario. Further analysis and consultation was conducted to extend to short wheelbase NC rigids (see Appendix 19). ESC on heavy rigid vehicles may be included as part of a package when AEBS on heavy vehicles is

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		considered (proposed action item under the 2018-2020 NRSAP).
	5. Proposes common applicability dates of 1 July 2019 for new model vehicles and 1 July 2020 for all new vehicles, for both ADR 35/06 and ADR 38/05.	5. Noted. Trailer RSC is already able to be equipped to existing trailer models without the lead time needed to develop ESC systems for motorised vehicles. The brake kits are designed to fit a range of models with adjustments made to suit the specific model of trailer. This is why an earlier implementation date has been set for trailers than for motorised vehicles.
Department of Transport and Main Roads, Queensland	1. Supports adoption of Option 6b in the consultation RIS, varied to expand the proposed requirements for RSC on trailers, to apply to both category TC trailers with a GTM greater than 4.5 tonnes and category TD trailers.	1. Noted. This proposed extension would fall between options 6a and 6b, with net benefits also reducing below those of 6b but remaining higher than 6a. This is still below the recommended Option 6c.
	2. Would prefer ESC to be mandated for ADR category NC vehicles (as per UN R13), rather than just 'prime movers (like the US). Notes that 'prime mover' is not an ADR category.	2. Noted. This would be similar to Option 6b. Refer to response 1 above.
	3. Would prefer that RSC also be required for category TC trailers above 4.5 tonnes GTM.	3. Refer to response 1 above.

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	<p>4. Believes the readiness of manufacturers is likely to be high, considering that category NC vehicles in Australia are largely sourced from three markets (Europe, North America and Japan) or are locally assembled based on their overall design/origin from those three markets, and bus subassemblies in Australia are largely of European design/origin.</p>	<p>4. This has been considered in the benefit-cost analysis. Although chassis models are often sourced from both Europe and the US, there are still differences in the final Australian supplied configurations. The Department has consulted further with industry and believe the revised implementation times are the most appropriate.</p>
	<p>5. Proposes common applicability dates of 1 July 2019 for new model vehicles and 1 July 2020 for all new vehicles, for both ADR 35/06 and ADR 38/05.</p>	<p>5. Noted. Trailer RSC is already able to be equipped to existing trailer models without the lead time needed to develop ESC systems for motorised vehicles. The brake kits are designed to fit a range of models with adjustments made to suit the specific model of trailer. This is why an earlier implementation date has been set for trailers than for motorised vehicles.</p>
McLean Technical Services	<p>1. Considers that the Australian road network is third world compared to Europe and the US, and that mandating of ABS, EBS or ESC should not be considered until the quality and consistency of Australian roads improves by several orders of magnitude.</p> <p>2. Suggests the activation trigger level of stability control systems is typically set too low/conservative (around 0.25g), which can cause premature brake wear and subsequently reduce brake performance.</p>	<p>1. Technical issues of the technology has been informed by the IRG which includes technical professionals involved in the heavy vehicle industry (refer to section 7.2). There has been no road issues raised that would prevent the use of these technologies and they have been used successfully for a number of years on a voluntary basis.</p> <p>2. ESC systems that comply with the testing requirements suggested in this RIS are based on an ESC activation of around 0.4g.</p>

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	<p>3. Considers ABS, EBS and ESC are complex, delicate and expensive components, completely incompatible with mud, bull dust, and other harsh/adverse road conditions in Australia.</p>	<p>3. There are a variety of ways to protect the sensitive components of a brake system using these technologies. This includes shielding and proper wiring of the system. This issue was explored in the NHVBS Operator/Maintenance Survey (Appendix 15).</p>
	<p>4. Believes mandating of ABS, EBS and ESC on heavy vehicles will promote the continued operation of older vehicles and ageing of the heavy vehicle fleet due to the cost, complexity and adverse characteristics of newer vehicles.</p>	<p>4. Noted. However the systems being considered are a relatively small part of the overall purchase cost of a heavy vehicle and owners/operators increasingly recognise the benefits in terms of reduced crashes.</p>
	<p>5. Is concerned that breakdowns due to ABS, EBS or ESC malfunction in remote locations will result in the loss of perishable, high value or dangerous freight. Is also concerned freight insurance costs will skyrocket and drivers will lose income for failing to complete haulage tasks.</p>	<p>5. These systems are already in use across Australia. The NHVBS Operator/Maintenance Survey (Appendix 15) included operators such as meat haulage which were using the technology. Despite some technical issues, overall the responses were positive to the technology.</p>
	<p>6. Recommends mandating that all air suspended axle groups be fitted with dynamic load sharing inherently damped fractional feedback unitary ride height controlled suspension systems.</p>	<p>6. This technology has not been supported by any of the general or specialised consultative forums as a viable technical solution to the safety issues being considered by this RIS.</p>
(NatRoad)	<p>1. Supports adoption of Option 6a in the consultation RIS.</p>	<p>1. Acknowledges the decrease in trauma under Option 6a relative to Options 6b and 6c. However, under the Australian Government Guide to Regulation, the</p>

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		<p>policy option offering the greatest net benefit should always be the recommended option.</p> <p>Further analysis and consultation was conducted to extend to short wheelbase NC rigids (see Appendix 19).</p> <p>ESC on heavy rigid vehicles may be included as part of a package when AEBS on heavy vehicles is considered (proposed action item under the 2018-2020 NRSAP).</p>
	<p>2. States that changes to the law relating to heavy vehicle safety should not focus primarily on changes to regulations relating to heavy vehicles, as heavy vehicles are usually not at fault. However, is supportive of measures which, on the evidence, are likely to reduce the incidence of heavy vehicle crashes.</p>	<p>2. Noted. However, a significant proportion of heavy vehicle rollover or loss of control crashes are single vehicle accidents. ESC and RSC will aid in reducing the severity of or preventing these crashes.</p>
	<p>3. Supports the use of engineering controls to regulate risk. Believes these are far more effective than administrative controls.</p>	<p>3. Noted.</p>
	<p>4. Agrees that ESC and RSC substantially reduce rollover and loss of control crashes.</p>	<p>4. Agreed.</p>
	<p>5. Agrees that the take up of ESC and RSC for heavy vehicles in Australia has been limited to date and that Government action is needed to accelerate the process.</p>	<p>5. Noted.</p>

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	<p>6. Supports conformity with overseas standards in jurisdictions where ESC and RSC have been mandated, as well as greater conformity with international standards.</p>	<p>6. Agreed.</p>
	<p>7. Believes the additional cost of Option 6a is not disproportionate to the benefits, and that this option would be more consistent with international standards.</p>	<p>7. Noted. An issue with exclusive use of international standards is the lack of defined performance requirements in UN R13. This make it difficult to implement in countries such as Australia where there are no UN recognised Technical Services. This is why the US based FMVSS 136 standard has been incorporated as an option in ADR 35. The requirements target prime movers which are most at risk of rollover or loss of control and to heavy buses (exceeding 5 tonnes) which have a high potential for loss of life in the event of a rollover or loss of control crash.</p>
	<p>8. Suggests the Department further examine engineering issues associated with including converter dollies within the scope of the proposal.</p>	<p>8. Noted. The Department will look at dolly converters in the future through continued work to improve heavy vehicle safety under the ADRs.</p>
<p>Heavy Vehicle Industry Australia (HVIA)</p>	<p>1. Supports adoption of Option 6a in the consultation RIS. Although Option 6a is the HVIA's preferred option, which provides the greatest road safety benefit, it accepts the reasoning behind the recommendation for Option 6c.</p>	<p>1. Acknowledges the decrease in trauma under Option 6a relative to Options 6b and 6c. However, under the Australian Government Guide to Regulation, the</p>

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		<p>policy option offering the greatest net benefit should always be the recommended option.</p> <p>Further analysis and consultation was conducted to extend to short wheelbase NC rigids (see Appendix 19).</p> <p>ESC on heavy rigid vehicles may be included as part of a package when AEBS on heavy vehicles is considered (proposed action item under the 2018-2020 NRSAP).</p>
2.	<p>Suggests that the stated benefits of Option 6 are underestimated. Explains that other technologies that are packaged with ABS/ESC/RSC should have also been included in the analysis. Notes that beyond the safety benefits, that the RIS does not consider benefits such as reduced wear and tear, and operational and vehicle information available through these systems.</p>	2. Noted. Although there are often extra benefits reported when using ESC (reduced tyre and brake wear, etc.), these have not been quantified and are unable to be included in the benefit-cost analysis. Additional systems that are packaged with ESC are also difficult to quantify as there is no guarantee that a manufacturer will include these options alongside the inclusion of ABS or ESC. For example, ABS has been mandated on all heavy vehicles since the start of 2015, however there has been a low uptake of ESC despite also being available.

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	<p>3. Believes that Option 3, which looks at fleet purchasing policy, should be pursued in parallel with Option 6, and that further analysis should be done on this option. Suggests that this would reduce the fleet age and therefore increase the fitment of safety technologies. Acknowledges that requiring the Government heavy vehicle fleet be fitted with ESC would only affect a minor segment of the Australian fleet, believes that this could be extended to be a contractual requirement for heavy vehicles to work on federal, state and territory infrastructure projects.</p>	<p>3. Noted. Item 9 of the NRSAP 2015-2017 is to promote the uptake of new vehicle technologies with high safety potential. This is likely to be continued in the next action plan, with action from relevant stakeholders required to maximise the potential of this item.</p>
	<p>4. Supports proposal to make fitting automatic slack adjusters a requirement. Notes that there has been feedback from infield use that there can be problems with automatic slack adjusters, but believes this is not a wide spread issue.</p>	<p>4. Notes the response to the RIS question and support for this change.</p>
	<p>5. Supports the proposal of fitment of RSC to non-air suspension trailers. Consulted HVIA members who supply brake systems, and they indicated that there are systems for use on trailers with steel sprung suspension.</p>	<p>5. Notes the response to the RIS question. This acknowledges that there is a need for RSC on steel sprung trailers in Australia.</p>

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6.	Supports the proposal to exempt ESC from prime movers with 4 or more axles. Notes that the number of vehicles affected would be small, and that new brake systems would need to be developed for these vehicles. It is not required in other overseas markets and would be a unique Australian requirement.	6. Notes the response to the RJS question.
Truck Industry Council (TIC)	<ol style="list-style-type: none"> <li data-bbox="403 757 435 1447">1. Supports adoption of Option 6c in the consultation RJS, subject to some recommendations for change [as listed below]. <li data-bbox="403 1447 435 1937">2. Proposes applicability dates for Option 6c of 1 November 2020 for new model trucks and 1 January 2022 for all new trucks. Considers this is a significant ADR change that will require more time for new models, and would prefer at least a 1 January all vehicles date to simplify enforcement, vehicle finance and insurance arrangements. Requests close alignment with the introduction of Euro VI (or equivalent) emissions requirements, as advanced safety features (including ESC) are only being fitted to Euro VI (or equivalent) trucks in other markets. <li data-bbox="403 1937 435 2018">3. Requests Government assist industry with the support and development of a test facility within Australia that is capable of undertaking the J-turn test in the draft ADR 35/06. Notes there is currently no facility capable of performing this test in Australia. 	<ol style="list-style-type: none"> <li data-bbox="403 1447 435 1937">1. Agreed. Further consultation was conducted with TIC after this submission on the items raised below. <li data-bbox="403 1937 435 2018">2. Agreed. Due to adjustments in timing to this phase of the NHVBS, it was agreed to reflect this by extending the new models date out to 1 November 2020. For the all models date, the small shift of 2 months from 1 November 2021 to 1 January 2022 was also agreed to assist with the financing and insurance concerns reported by TIC which would disincentivise purchases of those models with the previous year build date. This would be a relatively small shift in the implementation timing consulted on. <li data-bbox="403 2018 435 2121">3. Noted. The draft ADR 35/06 test procedures have been revised to provide more opportunities to identify suitable test facilities and/or to allow for partial simulation testing instead.

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	<p>4. Suggests adding an optional rigid truck test method for the J-turn test in the draft ADR 35/06. This would allow other standards used in particular industries, for example AS 2809 (Dangerous Goods Vehicles), to refer directly to the ADR. Without this, other standards will likely refer directly to UN R13, which would disadvantage local manufacturers not accessing the UN testing/certification process.</p>	<p>4. Noted. Although rigids aren't included in the FMVSS 136 test, as buses are and there is a similarity in mass in dimensions, a clause allowing rigids to optionally test to this standard could be included in ADR 35/06.</p>
	<p>5. Requests as a matter of priority, a review of ADR 35 selection of test fleet criteria for trucks, including the types of simulation testing that would be acceptable. Considers manufacturers will need this detail to estimate the type and physical quantity of tests required, before they can commence any commercial negotiations to develop a local test facility.</p>	<p>5. Noted. An updated draft ADR 35/06 with provisions for simulation testing of the ESC system based on physical testing has been provided to TIC following further consultation. This is based on the requirements in UN R13.</p>
	<p>6. Requests Government consider measures, including incentives (e.g. rebates, increased depreciation, stamp duty concessions, reduced registration, increased axle mass limits), to accelerate the take-up of new trucks fitted with ESC systems. Notes, given the current average age of the truck fleet, that only 50 per cent of category NC prime movers on Australian roads in 2035 will have ESC.</p>	<p>6. Noted. Item 9 of the NRSAP 2015-2017 is to promote the uptake of new vehicle technologies with high safety potential. This is likely to be continued in the next action plan, with action from relevant stakeholders required to maximise the potential of this item.</p>

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	<p>7. Suggests Government revisit adoption of Option 6a, as part of a future review of ADR 35, conducted in consultation with TIC and industry, and allowing for suitable introduction timelines. Considers as ESC is voluntarily fitted to more rigid trucks to meet customer/market demand, the cost of the systems will decrease, which would in-turn, make the outcome of any future benefit-cost analysis to mandate ESC on all trucks, more favourable.</p>	<p>7. Noted. As a number of correspondents supported Option 6a, further analysis was conducted (see Appendix 19) to consider including short wheelbase rigid – those that are often variants of prime movers. This would set a fitment and functional requirement only, with no physical testing of the ESC system required.</p> <p>Through further consultation with TIC, this was developed to cover short wheelbase rigid with a definition from UN Regulation 29 used to define the relevant wheelbase length for both cab-over engine vehicles and conventional bonneted vehicles.</p> <p>Further fitment of ESC on heavy rigid vehicles may be included as part of a package when AEBS on heavy vehicles is considered (proposed action item under the 2018-2020 NRSAP).</p>
<p>Roads and Maritime Services, NSW Government</p>	<p>1. Supports adoption of Option 6a in the consultation RIS.</p>	<p>1. Acknowledges the decrease in trauma under Option 6a relative to Options 6b and 6c. However, under the Australian Government Guide to Regulation, the policy option offering the greatest net benefit should always be the recommended option.</p> <p>Further analysis and consultation was conducted to extend to short wheelbase NC rigid (see Appendix 19).</p> <p>ESC on heavy rigid vehicles may be included as part of a package when AEBS on heavy vehicles is considered (proposed action item under the 2018-2020 NRSAP).</p>

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	<p>2. Feedback was provided by way of suggested changes to the draft ADRs 35 and 38. The suggested changes included those that would align the ADRs with Option 6a. In addition to changes relating to the RIS, NSW RMS made suggestions for ADR changes to requirements for light trailers (up to 4.5 tonnes).</p>	<p>2. Refer to response 1 above regarding changes to the draft ADRs that align with Option 6a.</p> <p>Suggested changes to ADR 38 for light trailers will be considered in the next phase of work to ADR 38. This will progress other issues that have been raised by industry such as dynamometer foundation brake testing and dolly converters.</p>
Tyre Safe Australia	<p>1. Supports adoption of Option 6a in the consultation RIS.</p>	<p>1. Acknowledges the decrease in trauma under Option 6a relative to Options 6b and 6c. However, under the Australian Government Guide to Regulation, the policy option offering the greatest net benefit should always be the recommended option.</p> <p>Further analysis and consultation was conducted to extend to short wheelbase NC rigid vehicles (see Appendix 19).</p> <p>ESC on heavy rigid vehicles may be included as part of a package when AEBs on heavy vehicles is considered (proposed action item under the 2018-2020 NRSAP).</p>
	<p>2. Suggests that in addition to technologies such as ABS and ESC, that tyre inflation should be considered important due to these technologies performing better when tyres are at the right inflation pressure. Believes that this can be addressed with tyre pressure monitoring systems.</p>	<p>2. Noted. In developing the NRSS, there were a number of rounds of consultation with road and vehicle safety professionals, the light and heavy vehicle industry, as well as with motoring and consumer groups. Particular emphasis was placed on the highest priority action items in terms of overall benefit to the community. In accordance with this approach, ESC for heavy vehicles was identified as a</p>

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	<p data-bbox="300 235 406 1473">Departmental Response</p> <p data-bbox="422 235 917 1473">priority vehicle regulatory initiative for implementation under the National Road Safety Action Plan 2015-2017.</p> <p data-bbox="422 235 917 1473">The effectiveness of ESC systems for heavy vehicles is expected to vary according to the condition of each vehicles foundation brakes (including brake pads/shoes and rotors/drums) and tyres (including inflation pressures). This has been accounted for in the RIS by estimating all benefits relative to the BAU scenario. The RIS therefore provides an estimate of the overall benefit expected across the entire heavy vehicle fleet (for which the conditions of both brakes and tyres on individual vehicles vary). Maintenance practices that improve the BAU condition of the foundation brakes and/or tyres fitted to heavy vehicles in service would likely increase the average overall effectiveness of ESC for these vehicles.</p>