

Vision Australia Submission

Response to the Inquiry into the National Road Safety Strategy 2011-20

Submission to: Department of Infrastructure and Regional Development

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Vision Australia Response

Vision Australia appreciates the opportunity to respond to the Inquiry into the National Road Safety Strategy 2011-20.

While the Terms of Reference for this Inquiry do not specifically mention road safety issues concerning pedestrians, we believe that the impact of quiet vehicles has the potential to cause such a major level of danger and harm to pedestrians who are blind or have low vision that we felt compelled to bring the relevant issues to the attention of this Inquiry.

Specifically, we are concerned about ‘quiet vehicles’, that is, vehicles that use electric power, or a combination of gasoline and electric power, making much less noise than conventional vehicles powered by gasoline alone.

Recommendation 1

We recommend that the Australian Government introduce a legislative mandate that noise-making devices (enabling pedestrians to detect the presence, direction, location and operation of quiet vehicles) be fitted to all electric and hybrid vehicles.

Quiet vehicle legislation internationally

In 2016, the US National Highway Traffic Safety Administration issued safety standards (pursuant to the *Pedestrian Safety Enhancement Act 2010*) for newly manufactured hybrid and electric light-duty vehicles. These standards (Federal Motor Vehicle Safety Standard No. 141) require these vehicles to make audible noise when traveling at speeds up to 30 kilometres per hour and when backing up so that pedestrians can detect their presence, direction and location. At higher speeds, the sound alert is not required because other factors, such as tire and wind noise, provide audible warnings to pedestrians. These guidelines also require that such sounds be emitted even when a vehicle is stationary.

The European Union “Regulation on the Sound Level of Motor Vehicle” (EU 540 / 2014) legally prescribes the mandatory installation of an AVAS (Acoustic Vehicle Alerting System) into electric- and hybrid-electric vehicles. However, the EU Regulation allows for a driver-controlled pause

switch and the voluntary introduction of a stationary sound. Therefore, the EU regulation in its current form fails to ensure maximum independence and safety for blind and low vision pedestrians.

The European Blind Union and World Blind Union continue to lobby for stronger requirements to be introduced. See: [EBU website for campaigning about 'silent cars'](#)

Recommendation 2

We recommend that the Australian Government mandate 'in-vehicle audio-visual signalling systems' as a minimum standard in the design of new vehicles.

Risks associated with quiet vehicles

Quiet vehicles pose safety risks to people who are blind or have low vision, as they often cannot be heard, especially when they are idling or changing speed. Consequently, quiet vehicles can compromise the independence and mobility of people who are blind or have low vision. Independence and mobility are human rights enshrined in Article 20 of the United Nations Convention on the Rights of Persons with Disabilities.

People who are blind or have low vision rely on environmental cues, including traffic noise, to travel and cross roads independently and safely. Quiet vehicles make it much more difficult and in some cases, impossible to:

- Accurately judge the amount and movement of traffic at signalled intersections and other complex crossing types, for example multiple road intersections, shopping centre entrances and roundabouts;
- Assess whether it is safe to cross a road when there are no audio-tactile traffic signals;
- Safely negotiate traffic in carparks;
- Identify and locate stationary vehicles, for example, taxis in waiting with taxi companies increasingly employing quiet cars for their fleet and taxis are a common form of transport for people who are blind or have low vision;
- Receive adequate warning of reversing cars.

We note that noise-making devices are a necessary, but not sufficient condition, of quiet vehicle safety. The popularity of audio-tactile traffic signals since their introduction in Australia more than thirty years ago attests to the importance of having both audio and visual information about the environment. The ability to both hear and see vehicles significantly reduces the risk of accident, whilst having to rely almost exclusively on only one sense greatly increases the risk of accidents.

Drivers need to be alerted to the presence of pedestrians as much as pedestrians need to be alerted to the presence of vehicles. The safety of blind and low vision pedestrians would be greatly enhanced by the inclusion of 'in-vehicle audio-visual signalling systems', as these systems can alert drivers to the presence of nearby pedestrians.

Quiet vehicle research

Research conducted in the UK highlights the hazard potential posed by quiet vehicles, concluding that quiet vehicles are more likely to be involved in accidents where pedestrians are injured or killed than internal combustion engine vehicles. See [EBU website which refers to this research](#)

In Australia, the dangers of quiet vehicles to people who are blind or have low vision were highlighted in a study conducted by Vision Australia and the Monash University Accident Research Centre. The study found that one in 12 Victorians who are blind or have low vision reported having been hit by a vehicle or bicycle in the past 5 years. The majority of respondents also reported that they were least confident when interacting with Quiet Vehicles and cyclists due to the limited noise they emit. See Oxley, J., Liu, S., Langford, J., Bleechmore, M. & Guaglio, A. (2012). Road safety for pedestrians who are blind or have low vision. Vision Australia & Monash University Accident Research Centre, Melbourne.

Vision Australia and Monash University are undertaking further road safety research this year, with a focus on the physical and emotional impact of quiet vehicles and bicycles on the blindness and low vision community.

Our above recommendations are based on the US safety standards which we consider to be international best practice. Failure to align Australian safety standards with international best practice exposes Australia to the risk of becoming a 'dumping ground' for vehicles manufactured overseas that do not comply with that country's safety standards.

We urge this Inquiry to recommend that action be taken, in line with our recommendations, to provide a policy solution to the dangers posed by quiet vehicles to blind and low vision pedestrians.

We would be happy to speak further to our submission should you require further information.

About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia's most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include:

- Registered provider of specialist supports for the NDIS and My Aged Care
- Aids and Equipment, and Assistive/Adaptive Technology training and support
- Seeing Eye Dogs
- National Library Services
- Early childhood and education services, and Felix Library for 0-7 year olds
- Services to blind and low vision children in schools to maximise educational outcomes
- Employment services, including national Disability Employment Services provider
- Accessible information, and Alternate Format Production
- Vision Australia Radio network, and national partnership with Radio for the Print Handicapped
- Spectacles Program for the NSW Government
- Advocacy and Engagement, working collaboratively with Government, business and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Knowledge and experience

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 26,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of the Organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of the Organisation to the Board and Management. Vision Australia is also a significant employer of people who are blind or have low vision, with 15%

of total staff having vision impairment. Vision Australia also has a Memorandum of Understanding with, and provides funds to, Blind Citizens Australia (BCA), to strengthen the voice of the blind community.