



National safety standards for electric and hydrogen-fuelled vehicles

Australian Hydrogen Council

27 March 2023

Submission to the Department of Infrastructure Transport, Regional Development, Communications and the Arts

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Introduction

The Australian Hydrogen Council (AHC) is the peak body for the hydrogen industry, with over 100 members from across the hydrogen value chain. Our members are at the forefront of Australia's hydrogen industry, developing the technology, skills and partnerships necessary to ensure that hydrogen plays a meaningful role in decarbonising Australian industry.

AHC welcomes a discussion on the Australian Design Rules (ADRs) for electric vehicles, including hydrogen fuel cell vehicles, to ensure their safe operation on Australian roads.

As more battery and fuel cell electric vehicles appear on Australian roads, it is critical that appropriate safety standards are established and that the new generation of vehicles are at least as safe as the vehicles with internal combustion engines they will replace.

We consider however that a more holistic conversation around ADRs should be had to address issues which may restrict the supply of heavy electric vehicles in Australia. Imposing new ADRs without thorough examination of existing requirements may serve to further constrain imports and hamper the road transport sector's progress toward net zero emissions.

While light battery electric vehicles have an increasing presence on Australian roads, Fuel Cell Electric Vehicles, which are likely to play a greater role in heavy transport, face a significant barrier in the form of current ADRs relating to width and steer axle load weight. A number of submissions in response to the National Electric Vehicle Strategy have highlighted this barrier, and AHC supports calls for the ADRs to be reviewed more broadly to allow greater uptake of zero emissions vehicles.

With the costs of redesigning trucks to meet Australian requirements estimated at \$15-\$30 million per year¹, consideration of this element of the ADRs could be instrumental in reducing barriers to the manufacture and import of heavy zero emissions heavy vehicles.

Recommendation 1:

That the development of ADR 109/00 and ADR 110/00 be undertaken as part of a broader review of the ADRs based on feedback provided by industry in the development of the National Electric Vehicle Strategy.

With specific regard to the ADRs 109/00 and 110/00, we consider the proposed rules to be generally fit for purpose. However, we note that the requirements for destructive testing may restrict the ability for participants in Australia's developing electric vehicle industry to compete with established original equipment manufacturers.

The Australian Hydrogen Council has a number of members seeking to reinvigorate the onshore motor vehicle manufacturing industry. While we understand that the ADR requirement for destructive testing is based on international safety best practice, we note that this requirement may hamper the development of a zero emissions heavy vehicle manufacturing sector in Australia. We

¹ Australian Trucking Association submission to the National Electric Vehicle Strategy, 31 October 2022

urge government to engage with new entrant manufacturers to establish support mechanisms to allow them to meet the costs of testing to the necessary safety standard.

Conclusion

AHC supports the Australian Government's approach to the ensuring the safety of Australian road vehicles.

We consider that the proposed ADRs 109/00 and 110/00 are an important piece of the regulatory framework however we contend that a broader review is required in order to allow Australia to move forward in pursuit of its National Electric Vehicle Strategy. This approach will facilitate not only the deployment of electric vehicles from incumbent manufacturers, but is also consistent with the objectives of the Modern Manufacturing Strategy which seeks to 'build scale and capture income in high-value areas of manufacturing where Australia either has established competitive strength or emerging priorities'.

If you wish to discuss any element of this submission in further detail, please contact Natasha Cerexhe at ncerexhe@h2council.com.au.