



Feedback Form – Public Consultation

Regulation Impact Statement and Australian Design Rule 108/00 • Vehicle Reversing Aid Technologies

Closing date for comments, 11 May 2022

Send feedback to Linda Rasmussen, Director of Vehicle Standards • standards@infrastructure.gov.au

Contact details

Contact Person	
Name of Organisation	Queensland Family and Child Commission
Position	Manager Child Death Prevention
Contact Details	email: child_death_prevention@qfcc.qld.gov.au phone: 07 3900 6030

Please indicate which option you support

	Yes	No
Option 1 – No intervention	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Option 2* – Introduce new Australian Design Rule aligned with United Nations Regulation No. 158	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*This is the recommended option in the Regulation Impact Statement

Please indicate your support for...

	Not supported	Supported if amended	Supported
The scope and purpose of ADR 108/00	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The level of detail provided in ADR 108/00	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Completeness of themes covered by ADR 108/00	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The general levels of stringency adopted	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Suitability of external standards and regulations referenced	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The provision of alternate/harmonised pathways (such as meeting UN Regulations in lieu of some requirements)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comments

The Queensland Family and Child Commission reports annually on causes of child deaths in Queensland. Sixteen child deaths from low speed vehicle run-overs have occurred in the last five years, as reported in the most recent annual report for 2020-21 (available <https://www.qfcc.qld.gov.au/keeping-kids-more-safe/preventing-child-injury-death>).

I am supportive of Option 2 to introduce a new Australian Design Rule for reversing aid technologies, as the interventions offer improved levels of protection for young children and other vulnerable persons.