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25th September 2019

To: Head of Legislative Reform, National Transport Commission, Melbourne, Victoria.

Re: Australian Road Rules, 13th Amendment Package

To whom it concerns,

The Australian Electric Vehicle Association (AEVA) is a not-for-profit, volunteer-run association dedicated to promoting electric vehicle (EV) technology. Established in 1973, we seek to educate, promote and inform the public about all forms of electric mobility including cars, bikes, buses, boats, trucks, trains and aeroplanes.

In response to the Australian Road Rules, 13th Amendment Package, section 1.1.8, the AEVA would like to offer the following comments in regards to electric vehicle parking, charging, and related signage.

1.1.8 Electric-powered vehicle parking

To encourage the use of electric-powered vehicles, councils (and others such as shopping centre operators) are increasingly designating parking spaces to be for exclusive use by such vehicles – including electric-powered vehicles being charged.

However, the Rules do not currently provide for parking areas that are for the exclusive use of electric-powered vehicles.

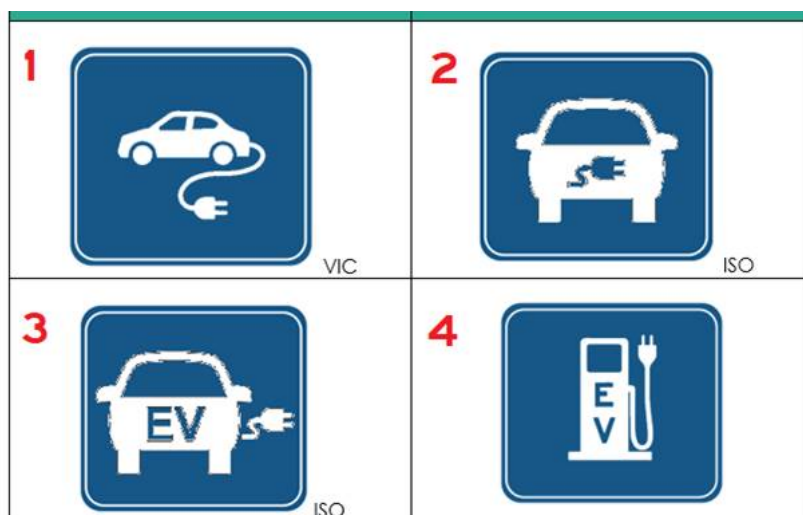
The amendments set out in Clause 22 (new Rules 203B and 203C) provide for electric-powered vehicle only parking areas and electric-powered vehicle being charged parking areas.

The amendments provide that an electric-powered vehicle is one that is powered by 1 or more electric motors or traction motors (whether or not there is another form of propulsion) and that can be recharged from an external source of electricity.

The new parking Rules require new signage.

One option is to base these new signs on existing International Standard Organisation (ISO) signs relating to electric vehicle charging station location. These signs are depicted in boxes 2 and 3 (below). Although these are ISO approved, these signs are not yet approved by Standards Australia for inclusion in the Australian Standards Specification for road signs/symbols AS 1743.

The sign in box 1 is one currently in use in Victoria. The sign in box 4 is another alternative which is currently in use in Western Australia.



The NTC seeks comment from stakeholders on which (if any) of these signs should be included in the Rules, or whether the proposal regarding electric-powered vehicle parking should be deferred pending approval of relevant signs by Standards Australia.

The relevant rules are as follows:

203B Stopping in a parking area for electric-powered vehicles

- 1) A driver of a vehicle that is not an electric-powered vehicle must not stop in a parking area for electric-powered vehicles.

Offence provision.

- 2) A parking area for electric-powered vehicles is a length or area of a road:
 - a) to which a *permissive parking sign* displaying an electric-powered vehicle symbol applies; or
 - b) to which an *electric-powered vehicle parking sign* applies; or
 - c) indicated by a road marking that consists of, or includes, an electric-powered vehicle symbol.

Note: *Road marking* is defined in the dictionary.

- 3) An electric-powered vehicle means a vehicle that:
 - a) is powered by 1 or more electric motors or traction motors, regardless
 - b) of whether the vehicle is also powered by another form of propulsion; and
 - c) can be recharged from an external source of electricity.

203C Stopping in a parking area for the charging of an electric-powered vehicles

- (1) A driver not must not stop in a parking area for the charging of electric-powered vehicles unless:
 - a) the driver's vehicle is an electric-powered vehicle; and
 - b) the electric-powered vehicle is plugged in to an external source of electricity.

Offence provision.

Note. *Electric-powered vehicle* is defined in rule 203B.

- (2) A parking area for the charging of an electric-powered vehicle is a length or area of a road:
- a) to which a *permissive parking sign* displaying an electric-powered vehicle charging symbol applies; or
 - b) to which an *electric-powered vehicle charging parking sign* applies; or
 - c) indicated by a road marking that consists of, or includes, an electric-powered vehicle charging symbol.

1.1 Parking or charging?

Given there are two distinct rules, one for parking and one for charging, signs adopted would need to make clear which apply in any given situation, or supplemented by wording on the signs that specifies this. In the absence of this, it may be that rule 203C states that it automatically applies if there is a sign and any charger is present.

1.2 PHEV/BEV distinction?

The definition includes both plug in hybrid vehicles and battery electric vehicles. At this time this is desirable. There may come a time when PHEVs are not offered the same status, or at least, some chargers or parking may be reserved specifically for BEVs. I believe this has happened overseas. Do we need to anticipate this?

1.3 Plugging in to park but not charge?

The rule 203C specifies:

203C Stopping in a parking area for the charging of an electric-powered vehicles

A driver not must not stop in a parking area for the charging of electric-powered vehicles unless:

- a) the driver's vehicle is an electric-powered vehicle; **and**
- b) the electric-powered vehicle is plugged in to an external source of electricity.

This does not specify that a car cannot be plugged in but not activated (i.e. it seeks to park there without charging). This may hamper the ability to enforce overstays or parking without charging which does occur and the looseness of the rule may be taken advantage of by repeat offenders that know the wording of the rule.

1.4 Permitting variation

The rule as written are absolute. Some sites have discretionary conditions e.g. '5 minute parking unless charging' that allows the use of the parking place for short periods particularly in high demand areas. The rule(s) might allow for local variations 'where signposted conditions permit'.

1.5 Choice of symbol.

Three of the four symbols shown could be taken to imply charging with a cord 'hanging out'. These may cause some confusion if used for parking only.

Symbol 2 or Symbol 3 with the letters EV but no cord accompanied by a capital P could be used to indicate EV parking. Symbol 4 is unambiguously for charging only and while having no official status in Australia, is used in the USA. Symbol 4 has also been used nationally by AEVA charge

sites for several years now around Australia, and is supplemented by explicit wording. An electric vehicle which is charging, is necessarily and unambiguously parked.

Sincerely,

A handwritten signature in black ink, appearing to read 'C Attwater', with a stylized, cursive script.

Clive Attwater, AEVA acting President