

23 December 2021

To:

The Hon. Kevin Anderson MP
Minister for Better Regulation and Innovation
GPO Box 5341
SYDNEY NSW 2001

CC: Stuart Charity CEO Australian Automotive Aftermarket Association, John Tansey; Executive Director Policy & Strategy, Better Regulation Division at NSW Department of Customer Service; Motor Dealers and Repairers Team Policy and Strategy Branch E:
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RE: ADAS and the Auto Glass Class of Repair work in NSW.

ADAS Calibration worldwide has been a "hot topic" for our industry, it has been one of the fastest growing automotive electronic segments, it is estimated that ADAS technologies will be featured in nearly every vehicle sold worldwide by 2025.

A once-simple glass replacement now requires the recalibration of the front facing camera per the manufacturer specification to ensure the correct functioning of a range of safety related features, like lane-keeping alerts and automatic high-low beams. If the glass installer lacks the training, equipment, and capability to initiate the recalibration of the system, they are putting the customer's and others life at risk and could be returning the vehicle to the customer in a state not aligned with the manufacturer's guidelines.

While increasing safety and reducing accidents, ADAS-related repairs are more expensive. This is being seen in not just glass replacement activity but also in general smash repairs.

In NSW following a review of the 'Motor Dealers and Repairs Act 2013' it has been recommended to define the repair work associated with ADAS Calibration of forward-facing cameras on a motor vehicle under the Classes of Repair Works of "Motor Mechanic and "Automotive Electrician".

This will mean that Automotive Glaziers will not be able to complete this repair work as part of the windscreen repair process in the future, potentially returning vehicles to customers with replaced/new windscreen glass, but without a recalibrated ADAS system (to manufacturer guidelines) as it must then be performed in another step by a "Motor Mechanic and "Automotive Electrician" generally at other premises or location. We firmly believe this poses a significant risk to the motoring and pedestrian population. Challenges in manufacturing booking capacity and processes as well as the logistics of a potentially two-staged windscreen replacement process will be a deterrent to have the 2nd key step of recalibrating the ADAS system skipped in many instances.

As 'Peak Industry Body' for the Auto Glass industry the Auto Glass Association (AGA) raises the following key points for consideration.

If this recommendation succeeds it will be a substantial blow to our industry given that many have made investment decisions in the interests of motorist safety to eradicate this high-risk potential of uncalibrated cars being sent back on the road post glass replacement. It is our view this recommendation has been made without full consideration of.

- the differences between scanning and calibration confusing mechanical fault diagnostics with recalibration initiation
- calibration equipment (manufacturers training) from recognised businesses of high market repute
- Inherent skills and knowledge
- OEM and technical data
- industry investment and training
- the place of calibration within the windscreen replacement process as seen in the appendix
- types of calibration (static/dynamic)
- consumers (safety, convenience, cost)
- insurers (customer satisfaction - Net Promoter Score (NPS), claims costs, investment)
- full risk analysis
- equipment, training, and resources outside of the auto glass industry

These questions have been raised worldwide, European studies focused on the links between windscreens and road safety across the UK, USA and Canada have concluded that Auto glass repairers are the best prepared to handle windscreen replacements and forward-facing digital camera recalibrations than any other service option. As auto glass is their business, they have invested in purchasing equipment and upskilling staff to meet the demands of these new technologies so are more likely to have the tools and resources available for forward-facing digital camera recalibrations and they are more likely to have the basic training and frequent experience in calibrations to do a precise job and they are aware of the need for calibration when replacing windscreens and equipped to guarantee their work and issue calibration certificates.

Forward/Front Facing-Cameras

Today many vehicles are equipped with front-facing camera (and sensors). These cameras (sensors) are commonly used to assist in the functioning of automatic emergency braking, adaptive cruise control, lane departure warning, lane keeping assist and automatic headlight high-beam activation and dimming.

Calibration (What is the difference between Dynamic and Static ADAS Calibration?)

There are two distinct branches of ADAS Calibration. Depending on the nature of your windscreen technologies, you will require either:

Dynamic Recalibration

This applies to the dynamic ADAS recalibration. A re-Calibration is carried out with the use of a device plugged directly into the car. In most cases, the vehicle will then need to be driven at a prescribed speed over a certain distance in optimum weather conditions so the system can become accustomed to certain road features. Often the vehicle manufacturer will stipulate specific parameters for calibration of their dynamic ADAS. The device initiates the recalibration of the ADAS system.

Static Recalibration

This applies to static ADAS recalibration. A recalibration is carried out in a prescribed and controlled workshop environment. This form of recalibration requires a specialist Camera and Sensor Calibration Tool utilizing target boards recalibration settings due to the particulars for their Static ADAS requirements.

Under both the dynamic and static recalibration methods for cameras the vehicle's electronic control unit (ECU) does the recalibration therefore the technician performing the task does not need to make any changes to the vehicles settings or go through a fault-finding process to identify and rectify issues.

Pre and Post Scan: (What is a pre and post scan?)

Pre-scanning either proves a vehicle system is undamaged or identifies what is damaged and what needs to be repaired.

Post-scanning proves the system is operational once repaired (to the specification of the vehicle manufacturer) and gives proof of proper performance at time of completion.

Calibration Equipment

The equipment used for this process is specifically designed for recalibration of forward-facing cameras and all technicians regardless of employment stream are provided the same level of training and ongoing professional development directly from the recalibration Equipment providers.

Moving this repair work away from the Automotive Glazier will create inherent pressures within the Automotive Mechanical and Electrical Fields due to the additional investment that will be required by them in equipment and training to meet the volumes of repair work our industry are currently managing. This may also lead to vehicles being returned to customer and road without a recalibration being performed on the ADAS systems, posing a significant safety risk.

This will also impact the level of service to consumers and vehicle safety as a result of delays caused when repairers outside of the Auto Glass industry do not have the availability or resources to complete repair work at the initial time of the windscreen replacement.

A vehicle is considered unroadworthy when it has a cracked windscreen and delays in repairs will place consumers and insurance providers at risk.

The experts who have developed and market the equipment required of both Static and Dynamic ADAS recalibration repair work have put significant investment into the Auto Glass industry by supporting Auto Glass repair businesses to understand and complete these repairs at no risk.

They have also in some instances and in conjunction with major insurance companies completed the relevant testing of their repair equipment to ensure it meets all requirements and supports both the OEM and the aftermarket industries. These companies provide the ongoing technology updates in accordance with the Automotive manufactures recommendations to our industry.

The ADAS recalibration repair is a specialised class of repair work within our industry and as such has the required level of autonomy to ensure that the overall safety of a vehicle is no way compromised, this level and detail of attention to the windscreen and its ADAS features would not be evident outside of our industry.

Other classes of Repair Work impacted by ADAS technologies not identified or under question may include:

- Tyre Fitters
- Vehicle Accessories Fitters

The Windscreen Replacement Process (with ADAS)

(Refer: Annexure A)

Training (Is training the question or answer?)

At present Training for anyone completing the recalibration process for Forward - facing cameras on a vehicle is provided by the recalibration equipment manufacturers. The primary providers of this equipment in Australia are.

- Bosch (Automotive Aftermarket in Australia and New Zealand)
- Hella Australia Pty Ltd
- Multibrand Diagnostic Solutions (TEXA)
- Autel

In November 2021 the Auto Glass of Repair work was introduced. As a result, the minimum qualification for a tradesperson certificate in "Auto Glass Class of Repair Work ' under NSW regulation is a Certificate II in Automotive Body Repair Technology (AUR20920).

As a peak representative of the industry, we believe the minimum required qualification for the Auto Glass Class of Repair work should be the Cert III in Automotive Glazing Technology (AUR32216)

In 2020 PwC within the Automotive Projects framework completed a review of the skills required to service, repair, and calibrate a range of advanced driver assistance systems (ADAS) on a number of vehicles and considered whether these skills constituted the introduction of a new job role within the Automotive industry.

Following consultation with the automotive industry and recommendations in October 2020 PwC skills for Australia released the new unit of competency (**AURETR149) Apply knowledge of ADAS technology in vehicle pre-repair scans**. This was added to the Automotive Retail, Service and Repair Training Package as an elective unit for the following qualifications.

- AUR30620 Certificate III in Light Vehicle Mechanical Technology
- AUR32120 Certificate III in Automotive Body Repair Technology
- AUR30320 Certificate III in Automotive Electrical Technology

Prior to this The Cert III Automotive Electric Technology or Cert III in Light Vehicle Mechanical Technology did not have specific units of competency that addressed the ADAS Calibration repair work procedures.

PwC Skills for Australia have confirmed that this unit of competency can be completed as part of AUR20916 Cert II and AUR3220 Cert III by way of packaging rules which allows learners to select a certain number of units in the AUR Training Package or another Training Package or accredited course:

It would be advantages for all parties to discuss further training solutions available to support the Auto Glass industry, working together with an authorised registered training organisation such as TAFE NSW and recalibration Equipment manufactures to develop and deliver relevant training programs that address the concerns being raised under the Current Automotive Repair legislation.

Microcredentials (Are they the answer?)

TAFE NSW's has introduced a new training path way called "microcredentials".

Microcredentials are industry recognised, skill-specific certifications that offer a new approach to learning, made up of one or more subjects from a TAFE NSW qualification

Microcredentials enable the learner to develop specific industry recognised skills that address their workplace needs without the requirement to complete a full qualification.

Impacts:

Impact of enforcing these changes on our industry members:

- Unemployment
- Mental health Issues of our industry members (auto glaziers & suppliers) and their families
- Economic and Financial
- Consumer safety and convenience of service
- Transport (school & public buses, coaches, taxis)
- Motor Mechanics and Auto Electricians ability to meet demands and financial costs of new equipment.
- Essential services (Police, Fire, Ambulance)
- Essential workers (doctors, nurses " in the words of COVID anyone who has a job to go to")

Recommendations:

We seek endorsement from NSW Department of Fair Trade that repair work associated with the replacement of an automotive vehicle windscreens with forward-facing Cameras (ADAS) can be completed by one of the following Classes of Repair Work subject to manufacturers and industry training requirements being met.

- Automotive Glazier (Cert III minimum qualification or equivalent)
- Automotive Electrician
- Automotive Mechanic

Regards

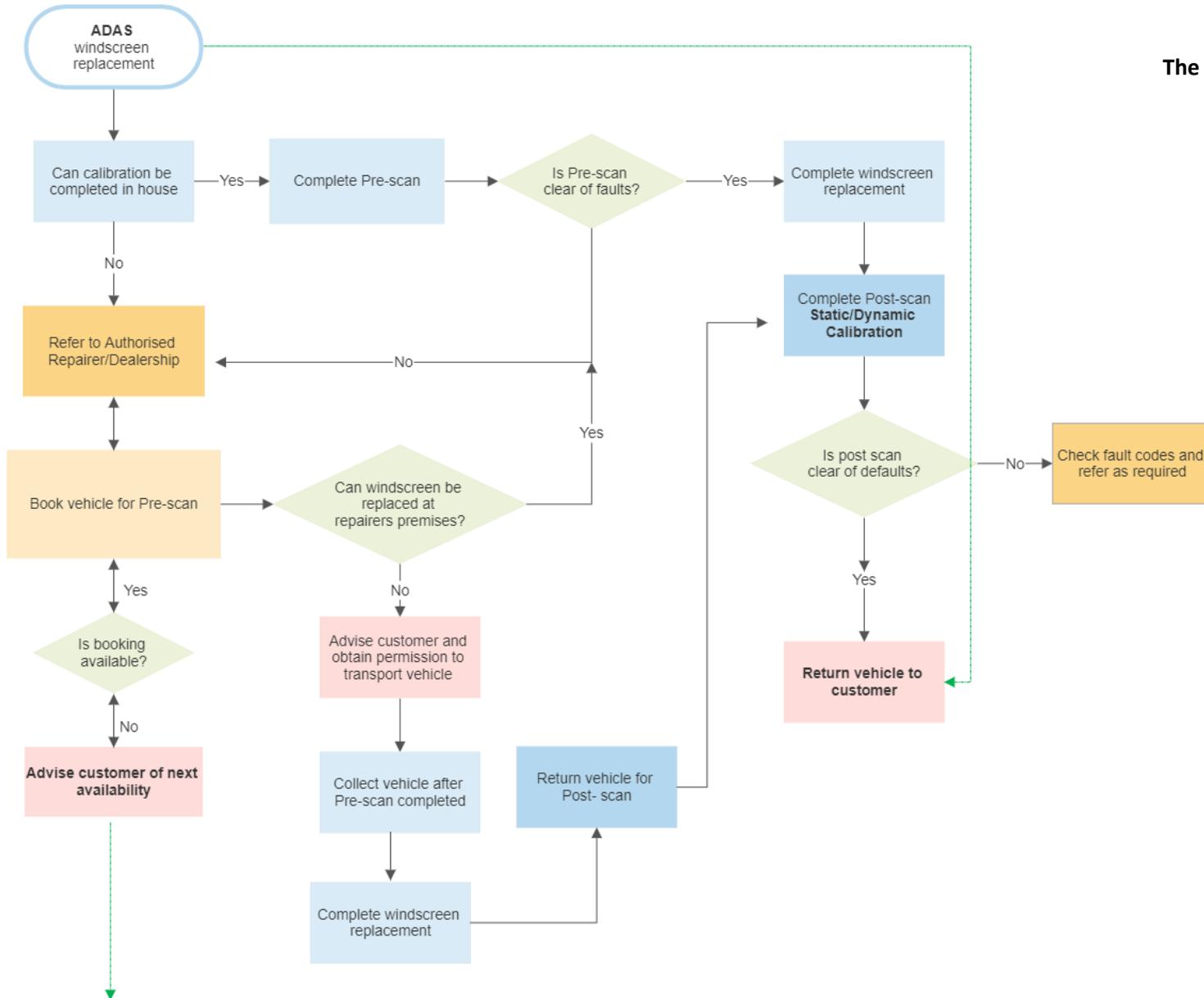
A handwritten signature in blue ink, appearing to be 'Rick Janssen', written over a horizontal line.

Rick Janssen

President

Auto Glass Association

The Windscreen Replacement Process (with ADAS)



NB: Even when a replacement windscreen may be available the authorised repairer or dealerships can be booked out for up to 4 to 6 weeks in advance causing delays & inconvenience for the consumer.

Risks!

- Consumer continues to drive unroadworthy vehicle
- Consumer has an accident whilst vehicle is deemed unroadworthy
- Repairer not available for post scan after windscreen replacement - customer drives vehicle at "own risk" without calibration being completed
- 3rd party damage to vehicle during transport from windscreen replacement to repairer/dealership