28 September 2012

Safe Work Australia
GPO Box 641
CANBERRA ACT 2601

By email quadbikesafety@safeworkaustralia.gov.au

Dear Sir/Madam

RE: REVIEW OF DESIGN AND ENGINEERING CONTROLS FOR IMPROVING QUAD BIKE SAFETY

I refer to the Review of Design and Engineering Controls for Improving Quad Bike Safety discussion paper (the Discussion Paper) recently released for public consultation. Suncorp welcomes the opportunity to contribute to the discussion.

Suncorp Group Limited and its related bodies corporate and subsidiaries (collectively ‘Suncorp’) offers a range of financial products and services in banking (Suncorp Bank), general insurance, life insurance and superannuation (Suncorp Life) across Australia and New Zealand. Suncorp has around 16,000 employees and relationships with over nine million customers nationally.

As the largest national personal injury insurer, Suncorp offers statutory classes of insurance predominately through the GIO brand for workers compensation, AAMI, GIO and Suncorp brands for compulsory third party insurance. Suncorp also offers limited commercial insurance liability cover through the Vero brand.

This submission is made on behalf of the Suncorp Commercial Insurance Division.

Whilst Suncorp does not profess to have expertise in relation to the general design solutions or engineering controls of quad bikes, we are in a position to make some general observations in reducing the risk of accidents and we provide our comments below.

General Comments

Health and Safety Authorities in all Australian jurisdictions have posted fact sheets on the safe use of quad bikes. For clarity, all-terrain vehicles (ATV) are referred to in all current safety literature as quad bikes. ATV is widely considered to be a misnomer, as experience and research suggests these vehicles are not suited to all terrain due to stability design flaws.

The discussion should also include the design flaws of utility terrain vehicles (UTV), also known as ‘side by side.’ They are similar to ATVs but usually have a bench seat (for a passenger) whereas ATVs require the rider to sit astride, much like a motorcycle. It is suggested that design solutions and/or engineering controls to meet the unique safety challenges for both quad bikes and UTVs should be considered separately.

Suncorp supports the nine recommendations made by the Mount Isa Centre for Rural and Remote Health\(^1\) to enhance the safety of quad bikes and suggests that some of these recommendations be considered for UTVs where appropriate, namely:

- safety equipment be mandated for all quad bikes and UTVs and be included at point of sale;
- an Australian design rule be developed to cover quad bikes and UTVs;

\(^1\) [Mount Isa Statement on Quad Bike Safety – 2012 – Media Release 3-8-2012](http://example.com)
prohibiting children under the age of 16 from riding quad bikes or UTVs of any size and designing these vehicles to prevent them from doing so;
prohibiting passengers and/or inappropriate loads being carried on quad bikes or UTVs under any circumstance and these vehicles being designed to prevent this; and
a campaign targeting employers and parents to increase their understanding of the risks associated with the use of these vehicles.

Investigating design features which could be incorporated into the quad bike or UTV to enhance safety should include:

- the inability to start up these vehicles until all safety features such as seat belts, helmets, approved crush protection devices and the like are properly utilised by the driver;
- the inability to start up these vehicles where it is inappropriately loaded (including the load of passengers) or where the centre of gravity has changed making the vehicle unstable;
- devices that advise the driver the stability rating of the vehicle whilst in use;
- considering, and where appropriate adopting technologies currently employed in modern road vehicles to enhance safety features; and
- an automatic shut off function (similar to a jet ski) when the driver falls from the vehicle.

**Conclusion**

Suncorp commends the attempts of Safe Work Australia to arrest the increasing rates of fatalities and serious injuries arising from the use of quad bikes and UTVs by examining safety design flaws in these vehicles. Whilst Suncorp is not in a position to offer design solutions and/or engineering controls to enhance the safety of these vehicles, examining technologies that prevent the start up of these vehicles when key safety equipment are not being utilised or where the stability of these vehicles are compromised should be explored. Technologies used in modern road vehicles might be useful for adaptation to achieve these outcomes. Improving awareness, compliance and safety in the usage of these vehicles needs to be part of this initiative.