



**FEDERAL
CHAMBER OF
AUTOMOTIVE
INDUSTRIES**

7 July 2026

Australasian New Car Assessment Program (ANCAP)
Level 3, 55 Blackall Street
Barton, ACT 2600

Sent by email: john.ryan@ancap.com.au

Dear John,

RE: ANCAP Consultation - Commercial Van Safety Assessment Program

With reference to your email of 4 June 2026, the FCAI have reviewed ANCAP's proposal to adopt EuroNCAP's 2026 Commercial Van's protocols and are pleased to provide our responses to ANCAP's consultation questions.

Should ANCAP proceed with this proposal, it will mark a significant change from the present medallion-based scheme to a star rating program, existing in parallel with ANCAP's core star rating program.

With the change in program proposed to commence during the second half of 2026, the lead time is quite short, particularly considering the addition of frontal crash testing requirement, pedestrian testing requirements and additional ADAS tests. Consequently, within the answers to ANCAP's consultation questions you will note we make some specific recommendations in relation to transitional provisions, grace period, protocol update periods and rating validity periods.

FCAI's Responses to ANCAP's Commercial Van's proposal consultation questions:

1. Timing and implementation:

a. Will the proposed transition timeline affect the launch of any specific van models or facelifts in Australia or New Zealand in the second half of 2026?

Considering the confidential nature of vehicle launch schedules, we would not normally receive advice from members regarding specific model launch timeframes.

The FCAI notes that ANCAP have approached commercial van OEMs directly and may have been advised of specific cases confidentially.

More generally, provision of appropriate lead times and transition periods is a critical matter. Protocol finalisation and release within a year of a rating period commencing is not reasonable, however this situation has become normalised by both ANCAP and EuroNCAP.



The minimum lead time FCAI expects in relation to new regulation implementation is 2 years from final publication date, longer for more complex changes, and this expectation is no different with respect to ANCAP protocols. The impact on development programs is no different. In our responses to the related questions below we will outline our proposals regarding appropriate transition period and protocol update cycle timing.

b. Are there any specific barriers that would affect ANCAP in implementing the new commercial van protocols in the second half of 2026?

Automotive programs operate on long development cycles [~4-5+ years for a full platform] and Commercial Vans (CVs) tend to have longer product lifecycles than passenger vehicles, with CV life often extending to 10+ years.

Considering this, to provide OEMs with time to consider the CV protocols and potentially incorporate them into their model cycle programs the following provisions are proposed:

- Protocol cycle update: Ideally adopt a longer review cycle for CV protocols—extend updates to every 5 years instead of 3.
- CV Rating validity: Align CV rating validity accordingly to a minimum of 10 years (covering two protocol cycles), compared to the current min 6-year validity (two protocol updates) for core/passenger ratings.
- Provide a grace period equivalent to one protocol period during which ANCAP will not select a particular model for a CV star rating. This does not prevent an OEM from volunteering to undertake a CV star rating during the grace period
- Whilst a CV holds a valid medallion rating, it will be ineligible for selection by ANCAP for a CV star rating. This does not prevent the OEM from volunteering to submit a medallion rated model to a CV star rating prior to the medallion rating expiry date.

2. Transitional arrangements for existing medallion gradings:

a. What would be an appropriate transition validity period for the continued maintenance of commercial van medallion gradings?

The FCAI proposes a 6-year validity period, consistent with core ratings, be applied to existing medallion ratings. This would not prevent an OEM from voluntarily submitting a van for a CV star rating whilst a valid medallion rating is in place.

b. Would OEMs consider pursuing optional retesting for medallion graded vans to receive a van-specific star rating? What barriers would affect that decision?

The decision to voluntarily submit a vehicle for star rating is a matter for individual OEMs. Typically, the following considerations would contribute to an OEM's decision-making process:

- Life stage of the product
- Development cost and timing



- Rating costs (Sponsored ratings are now very costly considering test vehicle costs, sponsorship costs and in-house testing costs)
- Protocol uncertainty (where protocols are not issued in a timely manner)
- The ratings value/standing. (is a rating important to the customer)

3. Treatment of existing star ratings:

a. Are the proposed arrangements to retain existing core program star ratings to the end of their validity period appropriate, or would an alternate approach be more appropriate?

Considering the significant investment made to undertake a core rating, it is entirely appropriate that the core rating remain valid to the end of the core ratings validity period.

Should ANCAP adopt the FCAI's proposal to align the CV star rating validity period to a minimum of 10 years, it would be fair and reasonable to apply the same validity period to an existing van that has a core program star rating.

4. Market-specific protocol considerations:

a. Are there any details of the Euro NCAP 2026 commercial van protocols that need consideration or clarification for Australian or New Zealand market context?

In relation to Side Impact protocol. The FCAI's understanding is that Head Protection Device (HPD) assessments are completed after a Pole test. We request ANCAP clarify the methodology with regards to HPD, and specifically whether an official and/or in-house pole test is required to support the CV star rating assessment. Noting that ANCAP have previously indicated only Mobile Progressive Deformable Barrier (MPDB) crash testing would be required for the CV star rating program.

Where it has been necessary to apply local variations to the core rating protocols from which the CV protocols have been based, these must be replicated in the CV protocols. The FCAI have not completed a clause-by-clause comparison to identify where all such adjustments are required, this is work ANCAP need to do to progress this program.

While alignment with Euro NCAP supports consistency and efficiency, ANCAP should ensure that the protocols align with regional conditions to ensure the protocols remain representative of the Australian and New Zealand operating environment and market requirements. Some points we recommend ANCAP consider are:

- Commercial van operating conditions differ from Europe, particularly in urban delivery, mixed traffic, and rural environments.
- The ANZ market is heavily fleet-focused, and protocols should remain relevant to volume-selling fleet specifications.
- Differences in road infrastructure, signage, lane markings, and road quality may affect the applicability and performance of safety technologies.
- Alignment with local regulatory requirements should be clearly defined (e.g. eCall).



- Validation conditions should reflect local operating environments where appropriate.

5. Customer information and product launches:

a. What information would OEMs need in relation to managing product launches and customer communications during the transition from medallion gradings to star ratings?

OEMs need early, consistent communication guidelines and timelines to ensure aligned messaging and avoid customer confusion during the transition. We request ANCAP consider the following points:

- Confirmed timelines: Transition dates and rating validity periods.
- Co-existence rules: How medallion gradings and star ratings are displayed together.
- Labelling guidance: Standard wording for marketing and customer materials.
- Comparison rules: How to explain differences between core and CV ratings, and old vs new ratings.
- Publication timing: When ANCAP ratings will be released relative to product launches
- Version clarity: How protocol year/criteria must be communicated.
- Unified information platform: To explain differences between various evaluation schemes.

b. How should ANCAP communicate the difference between core program star ratings and commercial van star ratings to customers and fleet buyers?

There needs to be clear differentiation, such that a core star rating will not be confused as a CV rating and vice versa.

This is particularly important when it comes to any risk that core star ratings and CV star ratings are directly compared. For example, where a sub 5-star core rating is compared with a 5-star CV rating, whereby it could be incorrectly inferred that the sub 5-star core rating may be deficient compared with the CV rating.

In the fleet space, where a fleet company may be purchasing a range of commercial vehicles, such as pickups with core ratings and vans with CV ratings, clear and unambiguous differentiation between the different star rating schemes must be present. The FCAI recommends that ANCAP:

- Use clear and distinct naming for each rating scheme.
- Clearly explain the purpose and scope of each assessment.
- Use distinct visual branding and presentation formats.
- Explain that Commercial Van ratings are based on commercial vehicle-specific criteria.
- Avoid direct comparisons between ratings issued under different assessment frameworks.
- Provide targeted guidance for fleet customers and operators.

The FCAI requests ANCAP's advise their intended messaging/recommendations to fleets in relation to fleet purchasing policies.



6. Future protocol updates:

a. How should ANCAP communicate and engage with van manufacturers on future changes to the Commercial Van protocols following the 2026 update?

Ongoing structured and early engagement is critical. In this respect, the CV program is no different to the core program with respect to communication and engagement with the FCAI.

As ANCAP are increasing their scope across multiple product categories with differing requirements, we would like to see a clear roadmap that ensures changes can be tracked and understood across categories.

Timely release of protocols is critical. Protocol finalisation and release within a year of a rating period commencing is unreasonable, however this has become normalised. The minimum lead time FCAI expects in relation to regulation implementation is 2 years from publication date, longer for more complex changes, and this expectation is no different with respect to ANCAP protocols. The impact on launch cycle plans and development programs is no different.

Protocol changes need to be technically feasible, globally aligned, and aligned with vehicle development cycles.

The FCAI recommends ANCAP consider the following points:

- Protocol publication: Minimum 2 years before commencement.
- Provide early visibility of proposed protocol changes.
- Continue regular technical engagement forums with industry.
- Publish a clear roadmap for future updates.
- Continue staged consultation processes from concept through to final protocol release.
- Provide early access to technical requirements and performance targets.
- Allow sufficient opportunity for industry feedback and validation.
- Maintain alignment with Euro NCAP wherever practical.

b. What information should ANCAP provide to manufacturers ahead of future protocol changes to support product planning and local launch decisions?

The answer to this question is a progression of the answer provided to the above question. ANCAP protocols are now highly complex and require integration into product development cycles. The development timelines already described require advanced warning, measured in years not months.

The improvements and benefits in terms of safety outcomes are increasingly incremental, rather than significant, and may not necessarily reflect a net positive cost benefit and negatively impact affordability. Increased effort is needed to ensure the trajectory of future protocol changes deliver value to the consumer.



ANCAP should provide early, detailed, and stable information to support OEM product planning and launch decisions, supported by identified positive net cost benefit to the consumer. In support of this, the following information would be beneficial:

- Forward roadmap: Clear timing of future protocol changes ($\geq 5-7$ years ahead).
- Evidence based justifications with cost benefit analysis supporting proposed changes. Including impacts on vehicle affordability.
- Vehicle scope and applicability requirements.
- Draft test procedures, scenarios, and performance thresholds.
- Future scoring methodologies and performance targets.
- Expected safety system and ADAS requirements.
- Transition arrangements and rating validity provisions.
- Test and validation conditions.
- Planned alignment with Euro NCAP and any ANZ-specific requirements.

Should ANCAP wish to discuss the FCAI's response to the commercial vans' consultation, please do not hesitate to contact me via phone or email, with my contact information shown below.

Yours sincerely,

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