Inquiry into the safety, regulation and penalties associated with the use of eRideables

RAC response to the WA Parliament's Community Development and Justice Standing Committee

July 2025

RAC

For the better

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Community Development and Justice Standing Committee
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RAC response to the *Inquiry into the safety, regulation and penalties associated with the use of eRideables*

We thank the Community Development and Justice Standing Committee (the Committee) for the opportunity to provide feedback into the *Inquiry into the safety, regulation and penalties associated with the use of eRideables* (the Inquiry).

Summary of key recommendations

1. The focus of eRideable reforms should be on optimising safety standards, regulations, policies and infrastructure for eRideables so that the benefits they offer can be realised safely.
2. Shared 'for-hire' eRideable schemes should be encouraged in suitable locations but must be underpinned by detailed planning and strong governance, and supported by appropriate infrastructure, education and enforcement.
3. Comprehensive safety features should be required for all shared 'for-hire' eRideable schemes in WA, including helmet verification, alcohol impairment detection in high-risk contexts, tandem riding detection, age verification, post-trip rider telematics ratings/feedback and utilisation of geofencing technology to support no-go zones, slow zones and designating parking areas.
4. Protected on-road bike lanes should be rolled out in highly used pedestrianised areas like the Perth CBD, enabling eRiders to complete their journeys safely and efficiently.
5. The *Road Traffic Code 2000* (WA) should be amended to allow eRideables to travel on roads up to 40km/h that have a dividing line or median strip. In highly used pedestrianised areas, this should be complemented by reducing the speed limit below 50km/h where this is not already implemented.
6. The WA Government should work with the Australian Government and other states and territories on a national solution to the use of illegal devices. This should consider restrictions on who is permitted to import eRideables, regulations at point of sale, improved information at point of sale, creating an offence for modifying devices, and requiring devices to have tamper-proof seals.
7. Rules around eRideable use must be enforced on an ongoing basis by WA Police as part of their broader traffic enforcement activities. This should include providing community education, issuing infringements in relation to road rule breaches and impounding unsafe illegal devices.
8. Data collection and reporting needs to be improved in relation to eRideable traffic volumes, speeds, crashes and near misses across the road and path networks.

About RAC

RAC is a purpose-led member organisation. Since our foundation in 1905, RAC has existed to be a driving force for a Better WA – this is our purpose. We act as a voice for more than 1.3 million members in more than 60 per cent of Western Australian households. We work collaboratively with government, industry, our members and

all Western Australians to champion change that will deliver safer, sustainable, and connected communities – this is our 2030 vision:

- **Safe** – We want fewer people killed or seriously injured on our roads;
- **Sustainable** – We want to reduce harmful vehicle emissions for cleaner, healthier air; and
- **Connected** – We want well-planned communities and transport that better connect people and places (enabling a reduction in car vehicle kilometres travelled).

RAC's Vision 2030 end states describe the future our social and community impact activities and initiatives are working towards. Of relevance to this Inquiry, our end states include:

- The rate of road deaths and serious injuries in Western Australia is approaching zero;
- West Australians feel safe using all modes of transport;
- Road users are taking responsibility for themselves and other road users;
- Low emission vehicles are widely available, affordable and a popular choice;
- Harmful emissions from passenger vehicles are reduced in line with international benchmarks;
- People are seamlessly connected by a flexible range of private, public and shared transport options, infrastructure, services and technology;
- Congestion has been managed to protect the liveability and productivity of the state;
- Transport is affordable and accessible.

RAC has undertaken a range of activities to support the safe use of eRideables:

- Engaging with government to draw attention to the key issues associated with eRideables, including providing input into the Road Safety Commission's Review of the eRideable Road Rules[1] (the eRideable Review);
- Sharing educational content to enhance understanding and empower action, such as through our Horizons magazine, social media and podcasts;
- Delivering community and school programs and workshops on the safe use of eRideables; and
- Developing evidence-based policy and advocacy activities through research, analysis and undertaking member surveys that have explored attitudes towards and usage of eRideables.

Introduction

RAC recognises the growing importance of eRideables as a transport mode, and the important contribution they could make towards our 2030 Vision. This is discussed in more detail later in this submission.

We also recognise the need to ensure the benefits of eRideables are realised safely so that both riders and other road users are making responsible choices, feel safe when travelling, and are not being killed or seriously injured. According to RAC's Member Priorities Tracker[2], only 29 per cent of members feel confident as drivers when interacting with eRideables, and just 17 per cent of members report feeling safe walking on paths shared with eRideables. Alongside the recent increase in fatalities involving eRideables, data suggests that when eRideable and bicycle usage volumes are compared to the number of fatalities and serious injuries, eRideables are disproportionately involved in serious crashes compared to bicycles. These findings highlight the need for interventions to improve safety and confidence for all road and path users.

While community safety is a key concern, it is important to consider the broader context and available data. While the prevalence of modified eRideables compared to legal eRideable involvement in crashes is unclear, anecdotal evidence indicates that most crashes involving eRideables stem from rule-breaking behaviour rather than inherent flaws in legally compliant devices. Data from shared scheme providers further supports this,

[1] Road Safety Commission (2025). Western Australian Road Fatalities and Serious Injuries 2023. Retrieved from: https://www.wa.gov.au/government/publications/review-of-the-erideable-road-rules-may-2025 (accessed 11 July 2025).
[2] RAC (2025). Member Priority Tracker: Road Safety (unpublished). Results based off 310 responses. Data has been post-weighted to be representative of RAC's membership which is broadly consistent with the WA population profile.

showing that crash rates remain relatively low – throughout the City of Perth's two-year E-Scooter Share Scheme[3], only 0.02 per cent of the total rides taken as part of the trial resulted in an incident; further, the Town of Cambridge[4] reported that there were no recorded injuries or damage during the first year of its eScooter trial.

To effectively minimise risk and reduce conflict between different road users, the most constructive approach is to invest in separate infrastructure or, where that's not feasible, to harmonise travel speeds across modes. Ultimately, the greatest safety threat to both eRiders and pedestrians continues to be posed by larger, heavier, and faster motor vehicles such as cars.

In line with WA's road safety strategy, we must align to the Safe System approach which seeks safe road use, safe roads and roadsides, safe speeds, safe vehicles, and post-crash response. eRideables have a clear role in enabling a sustainable, connected, and inclusive urban transport network, but safety standards, regulations, policies and infrastructure need to be optimised to support their safe integration. We need layers of protection so that if one layer of the system fails, other layers will still protect the road user from death or serious injury. All of us have a responsibility to ensure our roads and transport system are safe for everyone.

The regulatory framework governing 'for hire' eRideable devices and current compliance of existing regulations

RAC supports the continued availability of shared schemes – these schemes have benefits over and above private ownership such as providing an effective and convenient first/last mile solution, enabling people to trial and/or use eRideables without needing to purchase their own, having the ability to incorporate more safety features than a typical privately owned device, higher rates of device utilisation (since one device can meet the needs of multiple users in any one day), and supporting recreation and tourism.

Despite these benefits, research has highlighted concerning trends in rider behaviour. An observational study conducted by the University of Western Australia[5] in 2022 and then again in 2023, found that while the majority of eRiders were observed to be compliant with regulations, riders of hire devices were found to exhibit more risky behaviour than riders of private devices. This aligns with findings from the eRideable Review which revealed stakeholder dissatisfaction with the current level of rule enforcement, and that better enforcement was particularly necessary on popular routes where there is often a crowded mix of pedestrians, eRiders and cyclists.

There are opportunities to improve the safety of shared schemes through strengthening scheme governance, planning and supporting infrastructure; supporting innovation in safety technologies; and with ongoing education and enforcement activities.

Shared schemes must be underpinned by strong governance, detailed planning, and appropriate infrastructure. Collaboration with key stakeholders, including law enforcement, is essential to ensure effective oversight and that the scheme is appropriately integrated into the road and path environment. Regulatory requirements should mandate comprehensive safety features in all shared devices, in recognition that the level of experience in the users will vary greatly, shared schemes are typically available in highly trafficked areas, and there is the potential for people to attempt to illegally use them. Physical infrastructure improvements - such as dedicated on-road parking bays, kerb ramps at transition points, and footpath advisory signage - can help integrate eRideables more safely into the urban environment. Virtual infrastructure, including geofencing for exclusion zones and go-slow areas, should be used to manage rider behaviour and protect vulnerable road users – these restrictions should also be considered in the context of the time of day or day of week e.g. weekend nights. Furthermore, operators should be required to monitor and publish high-level data on usage, risky behaviour, and crash incidents to inform policy and public awareness.

[3] City of Perth (2025). Ordinary Council Meeting Minutes – 29 April 2025. Retrieved from: https://perth.wa.gov.au/council/council-meetings/ordinary-council-meeting-29-apr-2025 (accessed 11 July 2025).
[4] Town of Cambridge (2025). Ordinary Council Meeting Minutes – Tuesday 25 March 2025. Retrieved from: https://www.cambridge.wa.gov.au/About/Town-Council/Agendas-Minutes (accessed 11 July 2025).
[5] Roberts, P., Yan, A. & Hasan, R. (2025). Risky Behaviour and Regulation Compliance in eRiders and Cyclists in Metropolitan Perth Western Australia. Retrieved from: https://www.sciencedirect.com/science/article/pii/S1369847825002207?via%3Dihub (accessed 14 July 2025).

Operators of shared schemes need to promote legislative compliance among users and ensure devices do not become hazards. There are a range of device safety features available to operators, which have been utilised to varying degrees in WA share schemes. WA local governments should require that these technologies are implemented as part of their agreement with operators:

- geofencing technology can be used to control where devices can be ridden, parked, and how fast they can travel in specific zones, as well as context aware restrictions at higher risk times (e.g. after dark or in certain areas on Friday and Saturday night)[6];
- the requirement to verify helmet use by submitting a photo before unlocking the device[7];
- in-app education on road rules and safe riding to help rider behaviour[8];
- collecting telematics data from journeys to monitor speeding, harsh acceleration or braking, and distracted riding, and then providing post-trip feedback to riders to encourage safer riding habits[9].
- age verification systems that require first time users to take a photo of a suitable form of ID to prevent underage use[10];
- free ride credits for undertaking online safety training[11];
- in-vehicle sensors that can detect tandem riding and prevent riders from continuing[12];
- app-based cognitive tests prior to commencing a ride in high-risk locations and times of day to detect alcohol impairment, restricting access when unsafe behaviour is identified[13]; and
- emerging technologies such as automatic emergency braking, unsteady movement detection, and inappropriate parking alerts[14].

Finally, public education and enforcement are critical to fostering a culture of safe eRideable use. Awareness campaigns should highlight the importance of responsible riding, while enforcement activities must reinforce the message that breaking road rules is dangerous and unacceptable. Penalties should be proportionate and visible, and reinforce the message that breaking the road rules is dangerous and should be reviewed every two years.

The usage and policing of eRideables in entertainment precincts and other highly used pedestrian areas

Entertainment precincts and other pedestrian-heavy zones are vibrant hubs of activity, but they also present unique challenges for transport and public safety. In these areas, eRideables offer a valuable transport alternative that can reduce car dependency – which contributes to traffic congestion, safety risks and poor air quality – and can support the creation of additional vibrant public spaces. In contrast, eRideables are compact, relatively low speed and have zero tailpipe emissions.

However, in highly pedestrianised areas, current regulations generally require eRideables to travel on congested footpaths at a maximum speed of 10km/h, due to the presence of dividing lines or median strips on most roads. This setup creates potential conflict between pedestrians and eRideables, while also making eRideable journeys less efficient and appealing. To address these issues, the RAC supports the separation of riding and walking environments, ensuring the safety and comfort of all user groups. The primary focus should be on the

[6] City of Perth (n.d.). E-Scooter Share Scheme (ESS) – FAQs). Retrieved from: https://engage.perth.wa.gov.au/e-scooter-share-scheme/widgets/396200/faqs#question98599 (accessed 16 July 2025).
[7] Voi (2020). Wear a helmet, get rewarded: Voi launches new Helmet Selfie feature to our app. Retrieved from: https://www.voi.com/blog/helmet-selfie (accessed 16 July 2025).
[8] City of Vincent (2025). E-Scooter Trial. Retrieved from: https://www.vincent.wa.gov.au/our-neighbourhood/parking-getting-around/transport/e-scooter-trial.aspx (accessed 16 July 2025).
[9] Bolt (2024). Keeping riders and pedestrians safe with Bolt's AMIS. Retrieved from: https://bolt.eu/en/blog/bolt-amis-keeping-road-users-safe/ (accessed 16 July 2025).
[10] Transport for London (n.d.). Appendix: London Rental E-Scooter Safety Features. Retrieved from: https://content.tfl.gov.uk/london-e-scooter-trial-safety-mitigations.pdf (accessed 16 July 2025).
[11] Ibid.
[12] Bolt (2024). Bolt introduces world exclusive tandem riding prevention system. Retrieved from: https://bolt.eu/en/blog/bolt-introduces-tandem-riding-prevention/ (accessed 16 July 2025).
[13] Beam (2024). Beam's 'Rider Check': A Cognitive Test for Enhanced Safety. Retrieved from: https://www.ridebeam.com/highlight/beam-introduces-rider-check-a-cognitive-test-for-enhanced-safety (accessed 16 July 2025).
[14] Veo (2024). Veo and Captur Bring AI-Powered Parking to 50+ U.S. Markets. Retrieved from: https://www.veoride.com/captur-brings-ai-powered-parking-to-50-us-markets-with-veo/ (accessed 16 July 2025).

provision of safe, protected on-road bike lanes in areas like the Perth CBD, enabling cyclists and eRiders to complete their journeys safely and efficiently. Encouragingly, new routes for the Perth CBD have already been identified in both the City of Perth Bike Plan 2025–2035[15] and the Department of Transport's Perth Greater CBD Transport Plan[16], offering a clear roadmap for infrastructure improvements.

Where full separation of modes is not feasible, the on-road environment must better accommodate eRideables. One practical solution, as identified in the Road Safety Commission's eRideables review, is to amend the *Road Traffic Code 2000* (WA) to allow eRideables to travel on roads that have a dividing line or median strip, as this will help reduce pedestrian conflict in highly pedestrianised areas. Given that roads with dividing lines or median strips typically carry fairly high volumes of traffic, it is desirable for these roads to have a speed limit of less than 50km/h to reduce the gap between vehicle speeds and to reduce the risk of eRiders being killed or seriously injured in collisions with cars. Consideration should therefore be given to only permitting eRideables to ride on these roads where the speed limit is 40km/h or lower. Many roads in pedestrianised areas already have a 40km/h limit (and a small number have a 30km/h limit), and the Perth Inner City Group is proposing to extend this 40km/h limit across all local streets within their local government areas, further supporting safer on-road riding.

The Perth Parking Licensing Account raises revenue to promote a balanced transport system to gain access to central Perth and to limit the growth of traffic congestion and deterioration of air quality in the central area[17]. This account currently holds $173 million and is forecast to nearly double over the next four years[18], presenting a significant opportunity to invest in protected bike lanes, speed limit reductions, and other infrastructure improvements that support safe and efficient eRideable use.

As discussed in the previous section, app-based cognitive tests should be utilised in entertainment precincts at high-risk times of day to restrict people who are impaired by alcohol from using a 'for-hire' eRideable.

A consistent police presence in entertainment precincts and other highly used pedestrian areas also plays a vital role in promoting public safety and addressing unsafe road use and other illegal behaviours. This police activity should take a holistic approach to helping everyone feel safe, rather than only targeting one road user type or illegal behaviour. As eRideables become increasingly popular in these zones, it is essential that proactive policing encompasses eRideables to ensure that riders adhere to speed limits, designated riding areas and other legal requirements and that likewise other road user behaviour does not endanger eRiders. These environments often involve interactions between different transport modes, making enforcement critical to preventing incidents and maintaining order. Visible and responsive policing not only deters risky behaviour but also reinforces community confidence in the safe integration of eRideables into shared public spaces.

Compliance and classification of devices, including illegal modifications and importation

Currently, no national vehicle standards govern the importation of eRideables. Under the *Road Vehicle Standards Act 2018*, road vehicles requiring registration must be listed on the Register of Approved Vehicles before they can be provided to the market for the first time in Australia. However, since devices that meet the legal definition of an eRideable have been excluded from the *Road Vehicle Standards Act 2018*, there is no existing mechanism for requiring devices to meet certain importation standards. This regulatory gap allows for the importation of high-powered, high-speed non-compliant devices, often under the premise that they will be used exclusively off-road. Adding to the complexity is each Australian jurisdiction defines eRideables differently, meaning a device that is compliant in one state may not be compliant in another. To address these inconsistencies and safety risks, states and territories should work collaboratively with the Australian

[15] City of Perth (2025). Bike Plan 2025-2035. Retrieved from: https://perth.wa.gov.au/-/media/Project/COP/COP/COP/Documents-and-Forms/Council/Documents/Plans/Bike-Plan-2025-2035.pdf (accessed 14 July 2025).
[16] Department of Transport and Major Infrastructure (2025). Perth Greater CBD Transport Plan. Retrieved from: https://www.transport.wa.gov.au/projects-planning/perth-greater-cbd-transport-plan (accessed 14 July 2025).
[17] Government of Western Australia Department of Transport and Major Infrastructure (2025). Perth parking management. Retrieved from: https://www.transport.wa.gov.au/projects-planning/perth-parking-management (accessed 15 July 2025).
[18] Government of Western Australia (2025). WA State Budget 2025-26 – Budget Paper No. 3 Economic and Fiscal Outlook. Retrieved from: https://www.ourstatebudget.wa.gov.au/2025-26/budget-papers/bp3/2025-26-wa-state-budget-bp3.pdf (accessed 15 July 2025).

Government to develop a coordinated solution to this issue. RAC has identified some potential solutions that are worthy of further exploration.

The NSW Government[19] recently decided to classify e-micromobility devices and their lithium-ion batteries as 'declared electrical articles' under the *Gas and Electricity (Consumer Safety) Act 2017*, meaning all lithium-ion powered e-micromobility devices sold in NSW must comply with prescribed electrical safety standards. This ensures that only products that meet rigorous testing and certification requirements can enter the market, significantly reducing the risk of battery-related fires and malfunctions. These standards also require suppliers to provide specific safety information to consumers at the point of sale. By mandating compliance and safety disclosures, NSW is proactively addressing these risks and discouraging the sale of non-compliant or illegally modified devices. The standards referenced by the NSW Regulation could form the basis for national regulation at point of sale, potentially administered through a body such as the Australian Competition and Consumer Commission. A consistent national approach would help harmonise safety standards across jurisdictions and reduce confusion for consumers and suppliers.

Further regulatory measures could include restricting who is permitted to import eRideables, such as limiting this to licensed motor dealers with appropriate accreditation and training. This would help ensure that only compliant and safe devices enter the market. However, prior to any changes being made, it is important to consider any potential externalities such as the impact on device prices. A key benefit of eRideables is that they are a lower cost and more accessible alternative to vehicles, therefore any costs associated with tighter regulations may be passed onto consumers through dealers.

Compounding the issue is the easy availability of online information that enables users to remove the 25km/h speed limiter on compliant devices, allowing them to operate at much higher, and far less safe, speeds. These modifications not only increase the risk of injury but also undermine the intent of existing safety regulations.

Suggestions from the eRideable Review consultation also include creating an offence for modifying devices, which could deter tampering and improve compliance. This could be supported by requiring devices to have tamper-proof seals – while the seals may be easily breakable, the ability for an enforcement officer to see the seal has been broken would reduce a level of complexity in determining if the device had been modified. Additionally, enforcement blitzes, the issuance of defective notices, and the impounding of illegal devices could have an immediate impact by raising public awareness and reinforcing the seriousness of non-compliance.

Acknowledging the complexities related to national harmonisation, tighter measures on the importation and sale of these devices, and additional enforcement, a key area for improvement is consumer awareness. Buyers should have access to clear, easy-to-understand information about device specifications and relevant regulations at the point of sale, on the device itself, and in associated promotional materials. This would help consumers make informed purchasing decisions and reduce the likelihood of non-compliant use.

Injuries as well as insurance claim submissions related to eRideables including: frequency, severity, location and time of day

As eRideables become more popular across Western Australia, there is growing concern about the frequency and severity of injuries associated with their use. Locally, data from Royal Perth Hospital shows that between 2017 and 2022, 74 people were admitted with fatal or serious injuries related to eRideables. More than half were not wearing a helmet and 39 per cent had consumed alcohol and/or drugs, and the majority were males aged 31-45 years old. International research from the International Transport Forum[20] reveals that eScooter crash injuries are distributed across various parts of the body: 25-55 per cent of eScooter crash injuries occur in the upper body, 23-45 per cent lower body, 18-41 per cent head region and 30-60 per cent face region.

[19] NSW Government (2025). Requirements for manufacturers and suppliers of e-micromobility products. Retrieved from: https://www.nsw.gov.au/housing-and-construction/safety-home/electrical-safety/lithium-ion-battery-safety/new-standards-for-lithium-ion-batteries-e-micromobility-devices (accessed 14 July 2025).

[20] International Transport Forum (2024). Safer Micromobility. Retrieved from: https://www.itf-oecd.org/safer-micromobility (accessed 11 July 2025).

These figures suggest that head, face, and upper body injuries are particularly common, often resulting from riders making face- or head-first contact with the ground before they can brace themselves.

However, the availability of comprehensive data remains limited, making it difficult to fully understand the risks and develop effective safety interventions. The recent eRideable Review noted that there is limited research and data on crash rates, risk factors, and other safety issues. To address this, there is a pressing need for improved data collection, reporting, and sharing mechanisms to ensure we can make evidence-based decisions to improve safety for all road and path users. In particular, there is a need for better data collection and publication relating to active travel modes, covering pedestrian, cyclist and eRideable traffic volumes, speeds, crashes and near misses across the road and path networks.

Although eRiders are currently classified as pedestrians under the *Road Traffic Code 2000* (WA), this classification within crash data obscures the true scale and nature of eRideable-related incidents. For greater transparency and more targeted safety responses, eRideable users should be reported as a distinct category in transport and injury data systems.

Even with limited data, existing state, national, and international injury statistics can be used to develop evidence-based safety measures aimed at preventing death and serious injury. By investing in better data and targeted safety initiatives, we can facilitate eRideables becoming a safe and sustainable transport option.

Benefits and opportunities created by eRideables for urban mobility and active transport

The benefits of integrating eRideables with our transport system are widely recognised - RAC supports the promotion of legal eRideables, such as electric scooters, which help make personal mobility an attractive and practical option for more people and reduce reliance on private vehicle use.

eRideables present a significant opportunity to enhance urban mobility by offering an affordable and accessible alternative to private vehicle use, in line with RAC's 2030 Vision. Their comparatively lower cost purchase and ease of use make them particularly valuable for individuals who do not have access to a driver's licence or personal vehicle, including young people (over the age of 16), those who are unable to drive, and those on lower incomes. By improving access to employment, education, and essential services, eRideables support greater social and economic inclusion across diverse communities.

These devices also play a key role in improving connectivity within the transport network, particularly by bridging the first and last mile gap to public transport. This integration helps make the broader transport system more efficient and attractive, encouraging multimodal travel and reducing reliance on cars for short trips. In doing so, eRideables contribute to a more equitable and flexible transport system that meets the needs of a wider range of users.

From a planning and urban design perspective, eRideables support the development of safe, vibrant, and liveable neighbourhoods. Their compact size and quiet operation reduce the environmental and spatial footprint of urban transport. By substituting private vehicle trips, eRideables can help manage congestion and improve space efficiency.

eRideables offer clear environmental benefits. Compared to internal combustion engine motor vehicles, and even compared to electric vehicles, they produce significantly lower emissions and pollutants, including noise and particulate matter. They improve the availability and affordability of low emission vehicles which can reduce harmful emissions in line with RAC's 2030 Vision. As cities strive to meet climate and air quality targets, integrating eRideables into the transport mix can support broader sustainability goals.

Finally, if supported by the right safety standards, regulations, policies and infrastructure, eRideables can contribute to a safer transport system in urban areas by replacing car journeys, which pose a greater danger to vulnerable road users such as pedestrians due to their larger size and mass and their faster travel speeds.

Conclusion – Building on the eRideable Review

RAC acknowledges the recent and planned actions to improve the safety of eRideables as identified in the eRideable Review. RAC was grateful to be a consulted stakeholder and broadly supports the recommendations from the review including: removing the prohibition on eRideables travelling on low speed roads that have a dividing line or median strip; providing alternatives to giving hand signals where it is unsafe for the rider to do so; conduct targeted education/awareness for school aged children and their parents about buying eRideables, the rules, rider courtesy and safe riding behaviour; and examining solutions to increase clarity on what constitutes a footpath versus a shared path, and to address issues with the signage/road markings of bicycle lanes.

RAC welcomes the Inquiry as an opportunity to build on the eRideable Review so that these devices can be used safely, enabling a range of transport and social benefits to be achieved.