



31 January 2020

The Committee Secretariat
Department of the Senate
PO Box 6100
Parliament House
CANBERRA ACT 2600

To the Committee Secretariat,

Road Safety Inquiry

RACV welcomes the opportunity to provide comment on the *Road Safety* Inquiry about the steps that can be taken to reduce Australia's road accident rates, trauma and deaths on our roads.

RACV supports the submission made by the AAA to this federal inquiry about road safety, and as such this submission echoes the general sentiment of the AAA submission and expound further on certain issues.

With more than 2.2 million members, RACV is a household name in Victoria and a highly trusted organisation. We have long represented our members on motoring and transport issues, advocating on their behalf, and expressing their views to both government and stakeholders.

How Victorians move around their state in the future is of vital importance to the good functioning of our state, and our submission outlines our feedback on the proposed changes.

Yours sincerely

BRYCE PROSSER
GENERAL MANAGER, CORPORATE AFFAIRS & COMMUNICATIONS



Submission to

Road Safety Inquiry

to Joint Select Committee on Road Safety,
Parliament of Australia

January 2020

RACV Submission to the Joint Select Committee on Road Safety, Parliament of Australia

As a member of the Australian Automobile Association (AAA) – the peak organisation for Australia’s motoring clubs and their eight million members – RACV supports the submission made by the AAA to this federal inquiry about road safety, and as such this submission will echo the general sentiment of the AAA submission and expound further on certain issues.

The AAA, in conjunction with its member clubs and 15 stakeholder groups, developed the *Reviving Road Safety*¹ report which outlines a series of federal policy priorities that can help reduce road trauma. RACV strongly encourages the Committee to consider the full report as part of this inquiry and also of the development of the next National Road Safety Strategy (NRSS).

We have attached our recent submission to the Parliamentary Inquiry into the Increase in Victoria’s Road Toll, as it provides further detail into the road safety issues facing Victoria.² See Attachment A document for this submission.

We have the following additional points we would like to highlight to this Inquiry.

(A) The effectiveness of existing road safety support services and programs, including opportunities to integrate Safe System principles into health, education, industry and transport policy.

From 2015, Australia has failed to be on track to meet the NRSS target of 30% reduction in fatalities on the pre-strategy baseline by 2020, as shown in Figure 1 below. Even then, fatalities are only a portion of the true scale of road trauma on Australian roads.

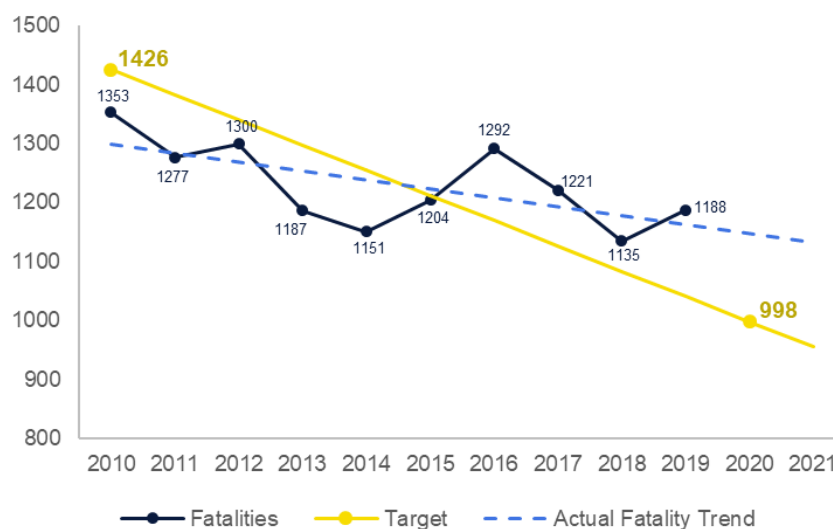


Figure 1. Road fatality trend in Australia and targeted trend, 2010-2021.³

¹ AAA, [Reviving Road Safety: Federal Priorities to Reduce Crashes and Save Lives](#) (Canberra: AAA, September 2019).

² Parliament of Victoria, [Inquiry into the Increase in Victoria's road toll submissions](#), accessed 31 January 2020.

³ BITRE, [Australian Road Deaths Database](#), accessed 22 January 2020.

For every person that dies on the road, approximately 30 others are hospitalised, about 7 of whom will sustain life-threatening injuries. In 2016, there were 38,945 hospitalised injuries; 9,605 of them suffered life-threatening injuries⁴.

We would expect the number of injuries on our roads to be under-reported due to the existing inadequacies of current data collection and coordination for injury data.

Multiple reports over the decade have stressed the need for strong leadership. The latest report, the 2019 Review of National Road Safety Governance Arrangements, found that “The Australian Government has not provided sufficiently strong leadership, coordination, or advocacy on road safety to drive national trauma reductions” even though it is best placed to do so.

As we come to the end of NRSS 2011-2020, there has yet to be a single national road safety agency that successfully spearheads and coordinates road safety best practice across jurisdictions. It is promising that the Office of Road Safety was established in July 2019 to provide greater national leadership to reduce road trauma and coordinate road safety efforts across Australia, but its capacity and authority is still unclear. The Office must be empowered and well-resourced to ensure that road safety is a priority and remains on the agenda of all levels of government.

A strong focus in the 2019 Review of National Road Safety Governance Arrangements was that while the Safe Systems approach is used as a guide from federal to local government, it is “not entrenched and mandated for consideration”. For Safe Systems principles to be well-integrated into health, education, industry and transport policy, there must be a clear understanding of it and a commitment towards making our roads safer from all levels of government. More detail on this is available under term of reference (D).

(B) The impact of road trauma on the nation, including the importance of achieving zero deaths and serious injuries in remote and regional areas.

Road trauma has been estimated to cost the national economy about \$30 billion (in 2015 dollars) and costs our governments \$3.7 billion (in 2015 dollars) each year. With poor and inconsistent data collection across jurisdictions especially for serious injuries, it would not be surprising if these numbers are conservative estimates of the impact of road trauma on the nation.

Beyond the numbers, the impact of road trauma is felt daily by the survivors of road crashes, whose injuries could have been prevented by more successful implementations of the Safe Systems on our roads. For those who do not survive, the ripple effect of road trauma is felt emotionally and monetarily by family and friends who have lost loved ones.

Statistics show that road trauma in regional areas is constantly over-represented each year. Across Australia, from 2011-2017 (the latest year for which complete statistics are available),

⁴ National Injury Surveillance Unit, [Hospitalised Injury](#), BITRE, accessed 22 January 2020.

65 per cent of road fatalities happened on regional and remote roads.⁵ Only 28 per cent of Australia's population live in regional and remote areas.⁶ This is shown in Figure 2, below.

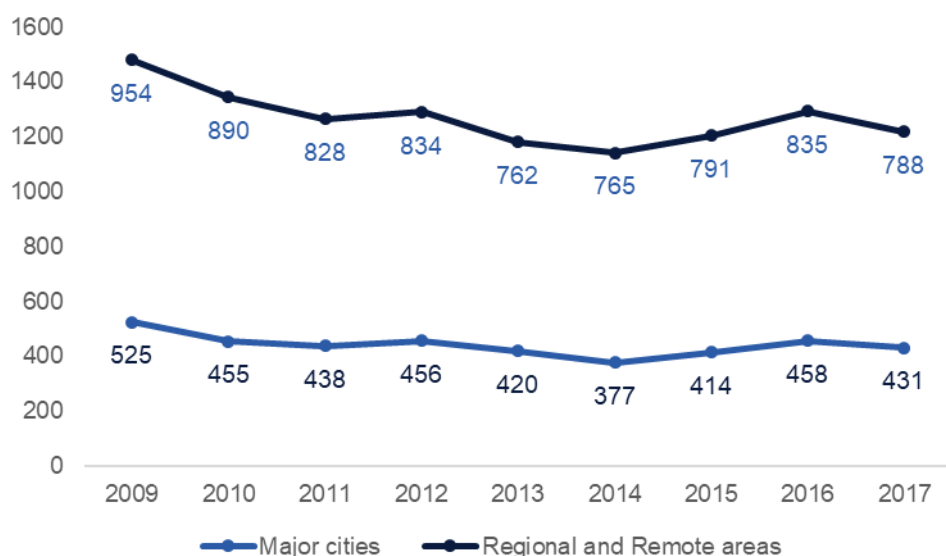


Figure 2. Number of road fatalities across Australia by remoteness areas, 2009-2017.⁷

While many people travel through regional areas, evidence shows it is largely locals who are dying on regional roads. In 2019, around 73 per cent of the 146 deaths in regional Victoria alone were people driving in their local region close to their home addresses, with run-off road and head-on crashes resulting in 94 fatalities, while 101 people died in high-speed zones⁸.

Not improving our road safety performance through the integration of Safe Systems into our approach to road safety and transport will be felt by all communities across Australia. The over-representation of regional and remote areas in road trauma means that this failure is felt more strongly in regional communities.

(C) The possible establishment of a future parliamentary Standing Committee on Road Safety and its functions.

RACV strongly supports the establishment of a future parliamentary Standing Committee on Road Safety and its functions. This will help road safety to continue being a parliamentary priority despite routine changes to government. To ensure the prospective Standing Committee is able to make a real impact on road safety, they must collaborate and communicate openly, consistently and transparently with the Office of Road Safety, the related government bodies and non-government stakeholders.

⁵ BITRE, [Road trauma Australia 2018 statistical summary](#) (Canberra: Commonwealth of Australia, 2019).

⁶ Australian Bureau of Statistics, [3218.0 – Regional Population Growth, Australia, 2017-18. Population Estimates by Remoteness Area \(ASGS 2016\)](#), 2008 to 2018, accessed 22 January 2020.

⁷ BITRE, [Road trauma Australia 2018 statistical summary](#) (2019).

⁸ <https://www.premier.vic.gov.au/too-many-locals-losing-their-lives-on-regional-roads/>

(D) Measures to ensure state, territory and local government road infrastructure investment incorporates the Safe System principles.

As quoted from the Inquiry into the NRSS, “we accept making the roads, vehicles and users safer, but frequently miss the opportunity to make them “SAFE” outright. The distinction is subtle but vitally important”⁹.

The consideration for the safety of all road users is not an option. Safety benefits must be prioritised in all infrastructure projects and programs and must be a significant selection criterion to meet for any project to attain funding.

More importantly, all levels of government must be engaged in this road safety vision. A strong focus in the 2019 Review of National Road Safety Governance Arrangements was that while the Safe Systems approach is used as a guide from federal to local government, it is “not entrenched and mandated for consideration”.

The review also highlighted that local government should be empowered to adopt the national vision and plan for road safety. Doing this instead of the current approach where local governments each have their individual long-term goals allows for a more consistent implementation of the Safe Systems approach state and nation-wide.

Local governments are the most direct link to the community and are indispensable for the adaptation of road safety consciousness at the individual and community levels. Despite this, they remain insufficiently resourced and engaged with higher levels of government in the road safety discourse.

Consultation with local governments in all 79 Victorian municipalities conducted by the Transport Accident Commission (TAC) identified that most local governments are already delivering their own road safety initiatives. However, among other barriers, they lacked resources, had poor understanding of Safe System principles, and were restricted by legacy infrastructure when implementing the Safe System. Local government representatives also highlighted the value of training, resource support, and better government funding approaches.

There must be greater leadership and political will at the federal and state levels to support and guide the integration of Safety Systems principles into all road infrastructure investment.

Without proper training, education and resources, local governments may not have the expertise and support to plan and request funding for infrastructure that incorporates the Safe System principles. Systematic education and training across all levels of government – under the leadership of the Office of Road Safety – will not only educate, but engage and empower state, territory and local governments to plan and invest in road infrastructure that is outrightly *safe*.

⁹ J. Woolley, J. Crozier, L. McIntosh & R. McInerney, [Inquiry into the National Road Safety Strategy 2011-2020](#) (Department of Infrastructure, Regional Development and Cities, September 2018), p. 5.

Appropriate infrastructure and speed limits

The *Inquiry into the NRSS* states that “many speed limits currently across the Australian road network are not conducive to eliminating harm. Many local streets which are often used by pedestrians and cyclists have speed limits of 50km/hour, a limit well in excess of the biomechanical tolerances of pedestrians and cyclists of around 30km/hour. Similarly, a regional back road with no shoulders, narrow profile, and no line markings share the same 100km/hour limit with a high volume, multi-lane highway, with protective barriers. These anomalies need to be rectified and speeds better aligned with the road infrastructure.”¹⁰

In many instances, such as the Victorian country roads over the page in Figures 1-3,¹¹ it is not possible to drive safely at the 100km/hour speed limit along these types of roads. However, these roads share the same limit as the Geelong Ring Road (Figure 3), parts of which are rated 5-star for safety as it is sealed, divided and with multiple lanes in each direction.



Figure 1. C229, Jeparit west of Warracknabeal



Figure 2. C511, Woods Point



Figure 3. Geelong Ring Rd

The *Inquiry into the NRSS* highlighted that there “is a vast network of 100km/h roads that offer no protection from the severe “head-on” or “run-off-road hit fixed object” crashes. Maintaining the current speed setting on this road type is unacceptable; governments have a responsibility to advise drivers of the appropriate travel speeds on these roads – a setting of 70 or 80km/h will save lives.”¹²

¹⁰ Ibid, p. 58

¹¹ Fig. 4-5 from Google Maps, Figure 6 from RACV.

¹² Woolley et al., *Inquiry into the NRSS 2011-2020*, p. 60

We are already seeing pushes for this to occur in Victoria, with Councils such as Mornington Peninsula calling for speed limits to be cut in their region as part of a two-year trial.¹³

The recent Side Road Activated Rural Speeds initiative rolled out by the Department of Transport is a good example of targeted speed limit reductions where risk is high. The new variable speed-limit system on highways is triggered by sensors that detect cars approaching from side roads and temporarily reduce the highway speed from 100km/hour to 70km/hour. A similar program in New Zealand has reduced serious and fatal crashes at intersections by 89 per cent since 2012.¹⁴

Speed management on country roads

RACV estimates there are over 180,000 kilometres of regional roads with 100km/hour speed limits in Victoria. We have estimated that upgrading these roads to a minimum 3-star safety standard would likely take around 1,000 years at the current rate of funding. Even if funding were to be doubled, this timeline is clearly not acceptable, and many thousands of people will have lost their lives due to road trauma in Victoria.

Therefore, RACV calls for an urgent review of speed limits on Victorian country and outer urban roads, prioritising roads where crashes are occurring, or are most likely to occur. Data on road crashes shows this is often secondary roads (such as local and C class roads) with lower traffic volumes. We note that the current *VicRoads Speed Zoning Guidelines* allow for a reduction in the posted speed limit from 100km/hour to 80km/hour where the road is rural (typically B or C class or local roads), carries a low volume of traffic, has a low safety standard and has a high crash rate or risk but is unlikely to attract funding.¹⁵ However, historically these roads have been sign posted at 100 km/hour, and there has been trepidation in reducing these limits.

(E) Road trauma and incident data collection and coordinates across Australia.

The road collision data currently collected is inadequate, and lacks detail, reliability and consistency within and across jurisdictions. The current state of data collection and coordination does not allow us to track road trauma trends, track progress against our targets, identify reasons for failure, or set evidence-based priorities.

Analysis presented in the NRSS Statistical Progress Measures show that irresponsible road use, safe speeds and safe vehicles are not adequately measurable.¹⁶ The *Inquiry into the NRSS* recommended to “Establish and commit to key performance indicators in time for the next strategy that measure and report on how harm can be eliminated in the system, and publish these annually”.¹⁷

The current state of road safety data has led us to be overly reliant rely on fatality data, as jurisdictional differences in injury definitions and reporting arrangements mean that there is

¹³ B. Preiss, ‘[“We Want to See Change”: Calls to Slash Speed on Mornington Peninsula](#)’, *The Age*, November 8, 2019.

¹⁴ S. Hewitt, ‘[New Tech to Cut Country Road Crashes](#)’, *RACV Royal Auto*, June 26, 2019.

¹⁵ Vicroads, [Traffic Engineering Manual, Volume 3 – Additional Network Standards & Guidelines. Edition 1](#). (June 2017).

¹⁶ ‘[Road Safety Performance](#)’, NRSS, updated November 2019.

¹⁷ Woolley et al., *Inquiry into the NRSS 2011-2020*, p. 8.

no reliable national collection of serious injury data. Consequentially, we are unable to effectively manage the serious injury problem and cannot calculate the true human cost and monetary cost of road trauma on our nation.

In the June 2019 *Review of National Road Safety Governance Arrangements*, one of the eight key findings, was that road safety data remains an issue as there is “no agreed national framework for road safety performance information. Development of better performance information and a national framework for monitoring and evaluation to better measure, target, monitor and evaluate data performance will provide a results framework and support the objectives of the next NRSS”¹⁸.

Furthermore, the *Inquiry into the National Road Safety Strategy* states that “There are many gaps in knowledge regarding injury numbers to the point that different sources contradict each other in relation to an increasing or decreasing trend... [and] alternative databases provide quite different snapshots of the injury situation.”¹⁹

These data issues are not new, and have been highlighted many times over the years.

Through the *Reviving Road Safety Report*, the AAA emphasises that the Office of Road Safety must work with state and territory governments to:

- Agree on consistent metrics and reporting formats for data
- Share all data sets, including a full picture on crash causes
- Integrate data sets – overlaying road crash information with geospatial, road network and health data; and
- Share these data sets in an open source platform and produce up-to-date reports on performance against NRSS targets.

(F) Recommending strategies, performance measures and targets for the next National Road Safety Strategy.

For targets in the current NRSS that have been met, the next NRSS is an opportunity to be more ambitious and set higher targets for reduction of road trauma to maintain and improve road safety initiatives that are working. It is not the time to become complacent and think that focus is no longer needed on the issue.

For the considerable number of targets that we have failed to reach and the actions we have failed to act upon, the next NRSS should be used to improve on our performance measures, strategies, and targets. All strategy and targets must be quantifiable, assessable and have clear measures of what success looks like.

It is critical that the next NRSS is developed in open consultation with road safety experts and stakeholders in various industries (e.g. motoring, transport, infrastructure, health). Our success in improving road safety relies strongly on collaborative effort between many agencies, yet to date, the development of the next Strategy has not been transparent.

¹⁸ Road Safety Taskforce, *Review of NRSS Governance Arrangements*, p. 4.

¹⁹ Woolley et al., *Inquiry into the NRSS 2011-2020*, p. 26.

RACV is concerned that this hinders engagement and consideration of the insights and wisdom that the relevant experts and stakeholders can contribute to make major changes in the way we approach road safety and road trauma in the next decade and beyond.

Strong leadership from the federal government will be essential to ensure the states, territories and local governments are empowered and incentivised to strive towards using a Safe Systems approach to meet NRSS targets. All levels of government must be committed to remain accountable for the planning, achievement, and evaluation of specified measurable performance indicators and deliverables.

(G) Recommendations for the role of the newly established Office of Road Safety.

RACV supports the recommendations provided in the AAA's *Reviving Road Safety* report regarding the role of the newly established Office of Road Safety.

The recommendations made were for the Office of Road Safety to provide national leadership and coordinate road safety efforts across jurisdictions by:

- Developing a whole-of-government approach to road safety, fostering communication and collaboration between federal departments and statutory authorities to deliver better, more cost-effective outcomes
- Identifying best practice to assist policy harmonisation between state and territories
- Overseeing a national road safety research program that informs evidence-based policy, infrastructure and vehicle design
- Overseeing the development and implementation of the next NRSS, ensuring it is well resourced and guided by robust and transparent data and well-defined metrics and targets
- Ensuring accountability by being responsible for translating the targets in the NRSS into the required actions
- Coordinating Australia's road safety data collection, analysis and reporting capabilities. Robust data must be used to inform road safety; interventions and this data must underpin measurable targets, transparent reporting and real accountability
- Administering a national AusRAP hub to maximise the life-saving potential of Australian Government infrastructure investment and meet the agreed policy target for 3-star and better roads across Australia; and
- Working with state and territory governments to invest in safety-focused transport infrastructure and upgrades to high-risk roads.

(H) Other measures to support the Australian Parliament's ongoing resolve to reduce incidents on our roads, with a focus on the recommendations from the Inquiry into the effectiveness of the National Road Safety Strategy 2011-2020.

There have been several reports relating to the NRSS 2011-2020 across in recent years, including:

- *National Road Safety Strategy 2011-2020*²⁰ (NRSS)
- *National Road Safety Strategy Action Plan 2015-2017*²¹
- *National Road Safety Strategy Action Plan 2018-2020*²²
- *2018 Inquiry into the National Road Safety Strategy 2011-2020*²³
- Australian Automobile Association's (AAA) *Reviving Road Safety* report²⁴
- *2019 Review of the National Road Safety Governance Arrangements*²⁵

Each of these reports sets out actions that should be implemented to achieve the next step change in road safety and avoid failure to meet our Strategy's targets. The recommended actions are known, but there must be political will to accelerate the adoption of all recommendations.

In particular, the 2018 Inquiry and 2019 Governance Review identified important high-level overarching issues that have led to our failure to implement the recommended actions and meet the targets outlined in the NRSS and Action Plans.

Key issues include nationally integrated data collection, analysis and reporting platforms and methods, embedding the Safe System approach in all road safety and infrastructure projects and funding across all levels of government, committing to road safety goals with clear key performance indicators and good measurement and reporting methods, safety of vehicles in the market.

These issues are not new, and have been raised previously, though they tended to not have been prioritised in the NRSS and Action Plans as key recommendations. Without proper execution of the aforementioned key issues, there is no clear way to measure our success in attaining the goals set out through the NRSS and Action Plans. As the *2018 Inquiry* found, "Failing to improve our current situation will result in 12,000 people killed and 360,000 admitted to hospital at a cost of \$300 billion [nationally] over the next decade"²⁶.

Inquiries into road safety are only useful when their recommended solutions are taken seriously and fully implemented. Continued inaction and failure to adopt the recommendations repeatedly outlined in past reports will cause our inevitable failure to reduce road trauma.

²⁰ Australia Transport Council, [National Road Safety Strategy 2011-2020](#) (Department of Infrastructure, Transport, Cities and Regional Development, 2011).

²¹ Transport and Infrastructure Council, [National Road Safety Action Plan 2015-2017](#) (Canberra: Commonwealth of Australia, 2014).

²² Transport and Infrastructure Council, [National Road Safety Action Plan 2018-2020](#) (Canberra: Commonwealth of Australia, 2018).

²³ Woolley et al., *Inquiry into the NRSS 2011-2020*.

²⁴ AAA, [Reviving Road Safety: Federal Priorities to Reduce Crashes and Save Lives](#) (Canberra: AAA, September 2019).

²⁵ Road Safety Taskforce, [Review of National Road Safety Governance Arrangements](#) (Canberra: Commonwealth of Australia, June 2019).

²⁶ Woolley et al., *Inquiry into the NRSS 2011-2020*, p. 5.

Therefore, RACV strongly encourages this Joint Select Committee to thoroughly review all National Road Safety Strategy documents listed, with close attention given to the 2018 Inquiry, 2019 Governance Review and AAA's *Reviving Road Safety Report*.

RACV further insists that past actions recommended in previous inquiries and reports, particularly the three key documents highlighted above, are implemented in full.

The Australian Government's efforts to reduce road trauma will be a marathon, not a sprint. The only way for the nation to more effectively reduce road trauma is to start planning and making improvements for the future now.