

Monday, March 12, 2018

Drs Jeremy Woolley & John Crozier  
National Road Safety Inquiry

Dear Drs Woolley and Crozier

## **National Road Safety Inquiry**

Martin Small Consulting is committed to the elimination of fatal and serious injury on Australia's roads. A national road safety strategy is essential, and we put forward for consideration some thoughts in response to the national inquiry commissioned by Hon Darren Chester.

Our contribution is not intended to be comprehensive or conclusive. Our contribution is put forward in the spirit of stimulating new ideas and approaches for how this major public health issue is tackled in Australia.

No criticisms of particular people or institutions are implied or intended. We can and must do better. Martin Small Consulting welcomes the inquiry, and would be pleased to support the implementation of its findings.

## **Key factors influencing Australia's road safety results**

The national inquiry seeks to identify the key factors involved in the road crash death and serious injury trends including recent increases in 2015 and 2016. We discuss five key factors that have been relevant to date and will continue to be relevant in the future.

We have not tried to deal with every factor, and have faith that the enquiry will address some of the obvious gaps that we have not touched. An example of this is the compliance and enforcement environment, which needs major attention, but can only be as effective as the standards which are set. Though recognised internationally for our contributions, Australia is currently punching well below our weight in road safety. We need to systematically lift our sights, and the safety standards which we hold ourselves to.

*i) The priority given to the prevention of road trauma by governments, parliaments, and public agencies with responsibilities in the area*

While it is desirable in the future for community or market influences to lead safety improvement, the influence that governmental and parliamentary institutions have on public safety on the road is likely to dominate for some time yet. We know what needs to be done to reduce the enormous social and economic burden of road crashes on society. Some things are not being done, such as requiring a technology fix to reduce the impact of distraction in motor vehicles. Some things are being done, but not nearly enough, such as reducing motor vehicle speed on the road.

One aspect of the priority required is to clearly nominate an agency to lead the national road safety effort. This is the very first recommendation of the World Health Organisation for countries wishing to tackle their road safety problem, yet it does not exist in Australia. This issue is real in Australia. Our experience, and the growing literature, shows that it cannot be addressed through committees or roundtables. It requires a strong governance structure, and a dedicated work group of road safety professionals charged with achieving results.

Effective national lead agencies can take a wide variety of forms, but they always hold a clear political mandate, and are resourced to lead the national effort, making the most of the many contributions made by stakeholders. In Australia, “stakeholders” include the Commonwealth, States and Territories, major user representatives, professions, community and business.

*ii) The extent to which road infrastructure investment is directed to the safety of the existing network*

The Victorian Safer Roads Infrastructure Program stands out as a systematic safety investment program, funded at a State level through its regulation of the injury insurance market, allowing road safety benefits to flow through to reduced insurance costs, creating a virtuous cycle for re-investment. There are other effective road infrastructure safety programs but they are generally under-resourced compared with the scale of the problem, and certainly in comparison with the generic road infrastructure investment in the State or Territory.

This is reflected in the interaction with the Commonwealth as it considers infrastructure investment. Typically, State and Territory proposals are for very big single infrastructure works, and not for safety projects along a nominated corridor. A strategic, transformative approach is needed, including a much stronger safety focus from the Commonwealth that breaks away from the small and piecemeal blackspot programs, and is a conditional part of new road infrastructure investment. At the very least, States and Territories seeking Commonwealth investment should be required to publish a national safety star rating assessment of their part of the national highway network.

*iii) The speed limits which motorists are advised to drive within*

While compliance with current speed limits still needs to be improved, and further investment in this required, current speed limits are almost uniformly too high for the prevailing design, function and use of the road. The result is many hundreds of fatalities and thousands of serious injuries each year.

The vast bulk of motor vehicle drivers have no intention or desire to break the law, and in many different actions in each trip demonstrate their willingness to contribute to their own safety and the safety of others. Regrettably, in regard to the single biggest safety issue on our roads, speed limit signs repeatedly give false and/or misleading information, suggesting for example that it may be safe to drive up to 100 km/h or even 110 km/h on a two lane undivided road between two rural centres.

In rural Australia, some limited introduction of lower speeds on roads with poor safety is welcome, but it would appear that road agencies have not sufficiently internalized this agenda to the extent that the community believes them. In urban Australia, the devastating impact of speed on non-motorised users is compounded by the ongoing reticence by governments to implement 50 km/h as the default urban limit on all roads where that is clearly the safe limit.

*iv) The safety quality of the vehicles which are allowed into, and remain in, Australia's national fleet*

For new light vehicles, this is perhaps the area in which Australia is, relatively speaking, performing at its best. But there is room to improve. A sustained consumer focus by the Australasian New Car Assessment Program, with State, Commonwealth and other support, has significantly lifted the safety of our new vehicle purchases. And lifting the bar of the five star safety standard will maintain this momentum for the light vehicle fleet.

As in all high-income countries, this is underpinned by the regulatory framework, and this needs constant attention. In particular, outside of the light vehicle fleet, we should be concerned about the length of time it has taken to regulate for ABS on motorcycles (beaten by India), and ESC and other technologies for trucks.

Looking well further forward, the nature of vehicle safety regulation needs to be fundamentally transformed to ensure autonomous vehicles are fail safe upon encountering a threat to life or health. Whichever way it is considered, much more investment and a new approach is needed in vehicle regulation. The old paradigm of regulate, check and enforce will not deliver the safety assurance needed with future technologies.

v) *The extent to which work-related vehicle use is being managed as the number one trauma issue by organisations*

Notwithstanding the systemic under-reporting of work related fatalities on the road, the scale of Australians' exposure to serious injury on the road while at work is significant, and its profile as an organizational issue will only continue to rise. In cooperation with Austroads, work health and safety regulators appear closer than ever to producing Australasia's first comprehensive guidance for WHS duty holders in this critical area. Around one in three light vehicle trips are work related (excluding commuting). Just as consumer information has been critical in extracting road safety value from vehicle safety regulation, it will be interesting to observe the extent to which duty holder information will extract road safety value from WHS regulation.

We also need to address organisational safety practices more widely. No-one catches a plane, train or ferry operated without a safety management system, but we scarcely think twice about this when it comes to the road – the most dangerous transport system. ISO 39001 Road Traffic Safety Management Systems provides organisations with the means to publicly demonstrate their safety credentials in the market place, yet no steps are being taken to incorporate this standard into public procurement systems. For example, ISO quality management systems and environmental management systems are required for every major road contract in Australia, but not a road safety management system – why is that? Public expectation of safety will only increase over time, and we need to start getting ahead of this ever-present and under-addressed risk in daily life.

### **Effectiveness of the National Road Safety Strategy**

The specific actions necessary to achieve significant improvements in road safety outcomes are largely known. These are dependent on leadership, commitment and resourcing that are currently at a level insufficient to achieve significant change. A national strategy is essential to support this but requires fundamental change to its scope and development process to achieve this.

Above all, a national strategy should provide a mechanism for individual jurisdictions and agencies to undertake joint development of strategy that can be implemented by all.

The effectiveness of a road safety strategy can be considered against quite generic principles of effective strategy management. These can be summarised as:

- Focus on the few things
- Clearly define actions
- Create unambiguous accountabilities
- Measure, review and adjust

The National Road Safety Strategy 2011-2020 (NRSS) demonstrates some elements of these but improvement is possible in all areas.

### ***Focus on the few things***

Effective strategies focus on the few things that matter most. The NRSS seeks to address the main road safety issues but tries not to leave anything out. Rather than achieve a few things well, the risk of this approach is that many things are only partially addressed. An alternative approach could be to agree a few high priority issues – for example, urban speed management, or heavy vehicle safety – put all efforts towards achieving substantial and sustainable improvements in these areas, and then move on.

This weakness was identified in the 2014 review of the national strategy and a focus was put on issues that “*warrant national attention*”. While understandable, this restricts the opportunity for the strategy to be a “*a blueprint to reduce deaths and serious injuries on the nation's roads*”, as described by Minister Chester in announcing the current inquiry, since most of the required actions in such a blueprint will not be national.

### ***Clearly define actions***

Actions that are not clearly defined may not be effective, may not be implemented to the extent envisaged at the start and are unlikely to represent an effective call to action. This has been a particularly problematic area for road safety in Australia. Many actions in the NRSS do not define a clear deliverable that allows progress or completion to be assessed.

For example, Action 24 in the original strategy document “*Investigate technology-based options to minimise driver distraction from in-vehicle devices*” does not define an output and provides no guidance about the scale of effort required. An alternative action such as “*Develop and implement standards for vehicles, nomadic devices and their interfaces to eliminate undue driver distraction from in-vehicle devices*” would be a more measurable, and ambitious, action. Some may rightly argue that the investigation has to come first but to make this the end point of a national strategy is weak. Strategies need some flexibility if initial investigations highlight the need for adjustment.

### ***Create unambiguous accountabilities***

Some actions, where they are clearly the responsibility of a single jurisdiction or agency, have a clearly defined accountability. These were lacking in the original published strategy in 2011 but are now present in the action plan prepared following the 2014 review. However, many are shown as joint responsibilities among states and territories. This reflects the current responsibilities for road management and road safety but joint responsibilities inevitably weaken any accountability to deliver.

This arises from the undefined expectations on each party and an inability for objective assessment as to the extent and success of any action.

Actions that define a single responsible entity oblige that entity to respond in terms of the proposed objective and their achievement of that objective. This must be a feature of any new national strategies, plans or agreements in road safety.

### ***Measure, review and adjust***

The NRSS provides a significant set of safety performance indicators. These are generally disaggregated final outcome measures – for example, different users killed, or crashes on road types. There are very few intermediate outcome measures – for example percentage of new vehicles purchased with five star ANCAP ratings – which can be more directly linked to specific actions and final outcomes. It is therefore unclear whether current adverse trends are due to the strategic actions not being achieved or whether the actions are being achieved but they are either ineffective or insufficient.

All measures should be able to be linked to strategies and actions that will drive a change in that area. However, not all do this. For example, the average age of the Australian vehicle fleet is shown as currently 10.1 years. While this is a key metric in determining the speed at which technological improvements can influence the greatest number of crashes, the NRSS contains no actions to reduce this. The Strategy states that there is an expected “*reduction in the average fleet age in Australia*” and the original document stated that incentives for faster fleet turnover would be investigated. However, there are currently no further actions to address this.

### **Possible improvements in preparation of a new national strategy**

There is no single or pre-determined solution or path for Australia to now follow in response to the road safety situation we find ourselves in. We have not tried to address every issue in this response to the national inquiry, and we don't pretend to have a better analysis or response than others.

In that spirit, we conclude by putting forward for consideration an alternative model for preparing and managing a new national road safety strategy in Australia.

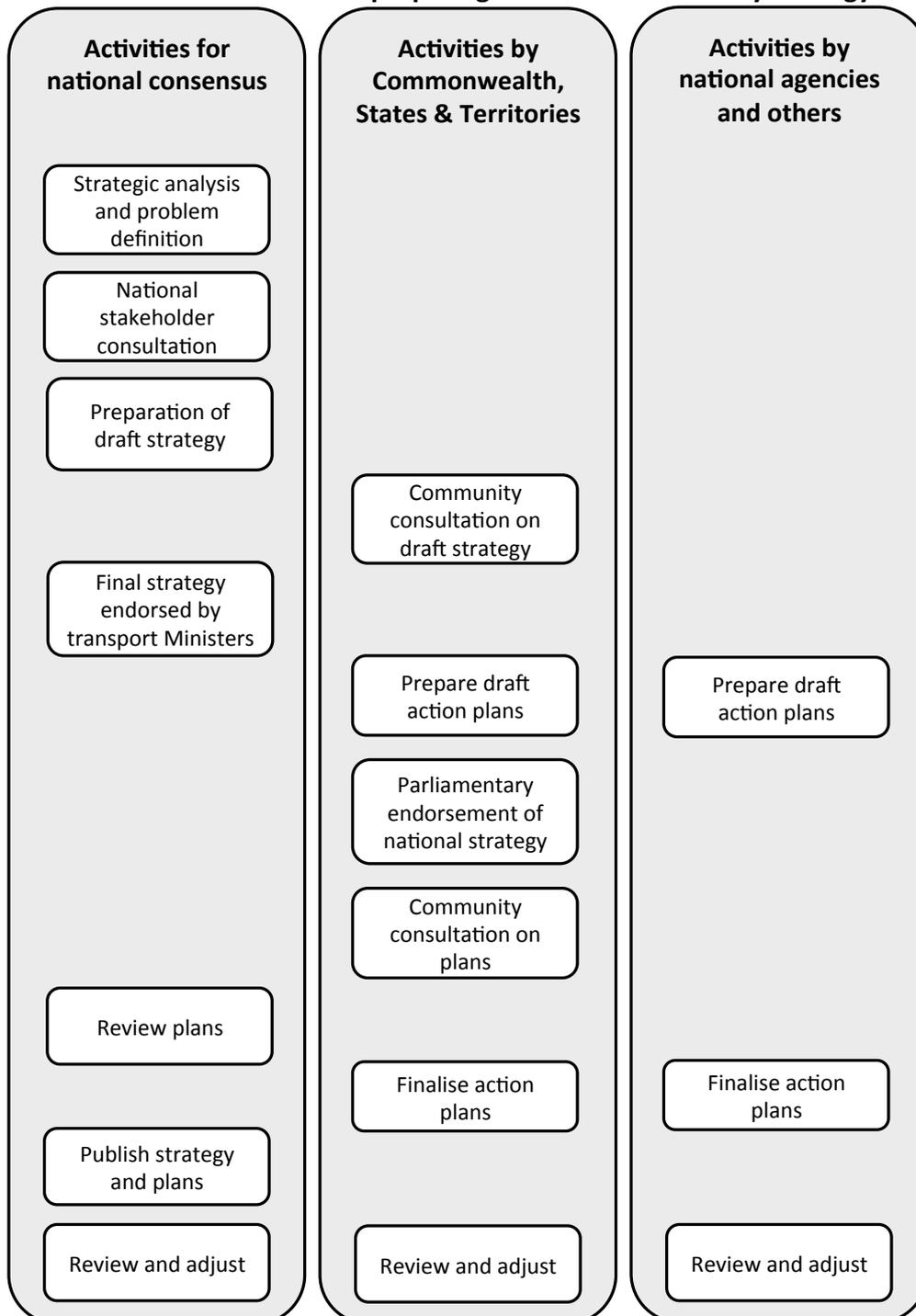
One of the significant issues raised previously is the need to create unambiguous accountability for action. Accountability can be improved by ensuring all actions have a single responsible jurisdiction or agency. These can also be structured in a way that captures all actions, not just those requiring national attention.

There is currently significant overlap and duplication between the National Road Safety Strategy 2011-2020 (NRSS) and the strategies plans of individual states and territories. Two recently announced (and valuable) strategic documents, from Victoria and New South Wales, provide similar high-level messages to the NRSS yet

make no reference to it. An alternative model could strengthen both national and jurisdictional plans.

In this model, the national strategy would articulate the vision of a safe road traffic system in Australia, interim national targets to that ultimate goal, strategic directions, intermediate outcomes which will be pursued, and ongoing management arrangements. Jurisdictions and national agencies would be left to define their own individual actions that indicate their commitment to these national directions.

**An alternative model for preparing a national road safety strategy**



The various plans prepared by jurisdictions and national agencies could define single accountabilities for each action and be capable of objective monitoring. This monitoring would hold all parties accountable for two aspects:

- that their actions represent a proportionate response to ambitious strategic goals, and
- that they are delivering these actions, through the use of relevant output measures.

An important feature of this model is that it more clearly defines the national tasks in strategy setting and review, the Commonwealth State and Territory tasks, and facilitates incorporation of the tasks that may be contributed by others.

It would more directly allow national agencies, and major stakeholders in the community or business sectors to connect with and support achievement of the national strategy. Rather than standing outside, the Australian Automobile Association, the Australian Trucking Association, local governments, business groups – any organisation committed to a safe road transport system in Australia – could submit their plans as a demonstration of support and commitment to the strategy.

Published together, this jointly developed document could provide the powerful blueprint that the NRSS is expected to provide. As the overarching strategy itself may contain no detail actions dependent on individual political or resource priorities, there may be an opportunity for this to be presented to parliament to seek broad cross-party support and commitment.

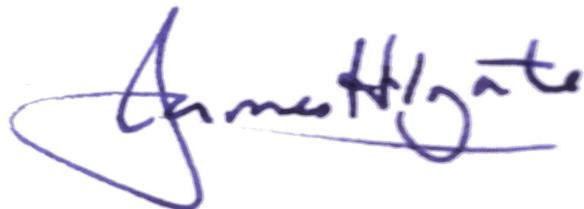
A key question in this model is who would develop the national strategy. The Austroads Safety Task Force has taken over some of this role from the former, policy-focused, National Road Safety Executive Group. However, with a number of jurisdictional lead agencies not members of Austroads, the need for a broader group could be considered. The short answer is the strategy should be developed by a work group resourced and mandated to lead Australia's national road safety effort.

Whatever the answer, the development must be an iterative process with opportunities for stakeholder input that carries through into stakeholder commitment to implementation.

Yours sincerely



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