

Australasian College of Road Safety Inc.

Submission to the Review of 2021-30 Draft National Road Safety Strategy

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Introduction

The Australasian College of Road Safety ('ACRS') is an independent not-for-profit incorporated association. It is the Asia-Pacific's peak membership association for road safety professionals, practitioners, researchers, advocates and members of the public who are focused on saving lives and serious injuries on our roads

In this connection we are ideally placed to provide expert comments on the National Road Safety Strategy 2021-30 (Consultation Draft – February 2021) ('NRSS'). In doing so the ACRS recognises the difficulties that arise when developing such a document and in particular securing common positions notwithstanding the vast array of interested parties. While concerns have been expressed among the ACRS membership that the NRSS has some significant weaknesses, it is important that the process of review and development continues. The ACRS offers this submission in the interests of continuing that process and finalising a NRSS that is appropriate, complete, readily understood and clearly sets out how road trauma will be reduced over the next decade and beyond. Our hope is that the final NRSS provides a strong platform that we can promote and use to drive our own activity, and achieve our common goals of eliminating serious road trauma.

Background

Australia's National Road Safety Strategy 2011-2020 achieved mixed results and overall fell well short of its targets. In recognition of this, in 2017 the then federal transport minister commissioned a comprehensive Inquiry into that Strategy. The Inquiry's 2018 report identified a range of issues, some specific failures and set out 12 recommendations. (attachment 1)

Following the Woolley/Crozier report the Government commissioned a Review of Road Safety Governance Arrangements, which set out 8 findings. (attachment 2)

These inquiries were important in terms of formulating new strategies particularly in relation to the avoidance of previous mistakes and dealing with the causes of previous failures. Given the extensive nature of this work, it is surprising some recommendations arising from these inquiries appear to have been overlooked in the draft NRSS.

ACRS Key Elements

In our letter to the Deputy Prime Minister in May 2020 (copied to State and Territory Ministers), and the College's subsequent response to initial engagement from the Office of Road Safety in September 2020, ACRS set out 6 key elements that the NRSS needs to incorporate. These and their status in the draft NRSS are set out in the following table:

Key Elements Proposed by ACRS	Status in the draft NRSS
<i>Ministers' 2050 vision for the elimination of fatalities on the road extended to serious injuries</i>	The long-term vision of zero deaths and serious injuries by 2050 is welcomed and sets the clock on an ambitious new safety agenda.
<i>2030 targets to reduce fatal and serious injuries by 50% (both raw numbers and as a population rate), backed by related performance and delivery targets</i>	We understand that the 2030 targets have been approved, and won't change. They fall short of the ACRS preferred targets. They are not supported in the draft strategy with reference to performance and delivery targets, which reduces the likelihood of being met.
<i>Publication in easily consumable form, for the public, of infrastructure safety star ratings for all road users</i>	This is not included in the draft NRSS. Having been included as a 2020 outcome measure in the last National Road Safety Action Plan, all reference to safety star ratings has been removed. This is a critical performance target defined by the United Nations and is a major gap in the strategy. ACRS recommends: Insert a new action in

	Infrastructure Planning and Investment “Publish safety star ratings of State and Territory road networks”
<i>Safety investment plans and budgets to achieve targeted improvements in safety star ratings</i>	We recognise the planning and investment intentions in the strategy. However, the lack of reference to safety star ratings hinders long term accountability for the delivery of safe roads, and there is no reference to the funding required to achieve 2030 targets or, indeed, how this funding gap will be identified.
<i>National Regulatory Impact Statement for lowering the speed limits for urban roads and for rural roads</i>	The inclusion of a RIS action regarding the rural default speed limit (regional roads) is welcomed, and will enable significant safety improvements. We urge the same for the urban environment to improve the safety of vulnerable users and support targets for serious injury reduction. ACRS recommends: Insert a new action in Vulnerable Road Users: “Development of a Regulation Impact Statement on reducing the urban default speed limit”
<i>Keep pace with European vehicle safety regulation that encourages evidence-based driver assistive technologies, especially intelligent speed assist and autonomous emergency braking.</i>	As there is no consultation on the action plans, the listing of priority technologies for ADRs listed in the vehicle factsheets needs to be included in the strategy, and be amended to add “intelligent speed assist”. ACRS recommends: Amend first action under Vehicle Safety to read “systems assisting drivers to stay <i>within the speed limit and</i> in their lane ...”

Given the focused nature of the proposals which we have consistently put forward, which are each consistent with the national perspective of this strategy, it is of concern that no reference has been made to several of them. The ACRS reaffirms its commitment to these 6 elements and encourages the Government to include them in the final version of the NRSS.

Star Ratings

For some years the ACRS has called for the publication of safety star ratings on the roads as a condition for any Commonwealth investment in the network. We continue that call.

There have been significant achievements globally by the International Road Assessment Program (iRAP), EuroRAP and previously, AusRAP. However, progress in Australia has been slow following the sidelining of AusRAP and, while some road authorities are using this assessment process, consumers still have no objective, easily understood, uniform public information about the safety of the roads they use. There is abundant evidence to support non-regulatory assessments of road safety with a highlight being the success of NCAP programs around the world and ANCAP in Australia and New Zealand.

These programs make essential public safety information transparent. This same approach will be particularly valuable for roads in regional communities where the fatality rates are so high. Respectful, strategic conversations are needed in regional communities about the inherent safety of the current infrastructure, the safety of the speeds that are being travelled, and the options and costs associated with providing a safe road environment.

Parliamentary Standing Committee on Road Safety

The ACRS also repeats our call for the establishment of a parliamentary Standing Committee on Road Safety.

The Australian Parliament is a vital part of our Federation, and the Standing Committee should assume a national leadership role for road safety in its own right. Parliament clearly sees a national role for itself, given the detailed Inquiry undertaken by the Parliamentary Joint Select Committee on Road Safety. The ACRS generally supported the 22 recommendations of that Inquiry and has identified four that it considers should be given priority consideration in the development of the NRSS.

- *The committee supports the findings of the NRSS Inquiry Report which recommended that the Australian government commit more funding to road safety.*
- *The committee recommends the establishment of a Parliamentary Standing Committee on Road Safety.*
- *The committee recommends that Australian Government identify priority roads for dedicated and targeted road funding partnerships with the relevant jurisdictions to improve the star rating performance of road infrastructure for all road users.*
- *The committee recommends the Australian Government review current timeframes for the mandatory introduction of safety features likely to have the greatest impact on reducing road trauma in Australia.*

Excerpt from: Joint Select Committee on Road Safety Report: Improving Road Safety in Australia 2020

The Australian Parliament has a vital oversight role to play in Australia's National Road Safety Strategy. We note, for example, its reference to the NRSS Inquiry, to the commitment of more funding, to its own role through a Standing Committee, to the critical linkage between funding and safety star ratings, and to those vehicle safety features with the greatest safety potential (eg intelligent speed assist). The NRSS should directly welcome this potential involvement and create and integrate a future Parliamentary Standing Committee into the Australia's national governance and accountability system for road safety. This would facilitate an entirely appropriate response from the Australian Parliament to ensure that implementation of the recommendations from the various inquiries is closely monitored and a high level of accountability is maintained.

NRSS Value

ACRS recognises many essential elements in the draft strategy. The College strongly supports:

- the establishment of a National Road Safety Strategy
- the commitment to the elimination of fatal and serious injury on the road by 2050
- the establishment of interim targets to 2030
- the inclusion of workplace road safety as a priority issue, which reflects the primacy of organisational delivery to the achievement of our ultimate road safety goals
- the inclusion of Indigenous Australians as a priority issue, which reflects the wider responsibilities our society has for our First Peoples
- the recognition of the vital role that local government will play in achieving our ultimate goals.

The ACRS also recognises the ongoing importance of the establishment of the Office of Road Safety within the Commonwealth Government – we continue to maintain this should be a statutory office. The ACRS also recognises the very significant recent allocation of Commonwealth resources to road safety – we see this as an indication of the annual investment required over the course of this strategy, not just in infrastructure safety focused projects, but in non-infrastructure safety projects that build the systems and required capacity to achieve our common goals of eliminating serious road trauma.

NRSS Improvements

ACRS also recognises areas where improvements could be made to the draft strategy:

Accountability

A significant weakness of the 2011-2020 national strategy was the lack of regular review, accurate performance measurement and clear responsibility for achieving targets. Accountability would be greatly improved with the addition of specific safety performance or intermediate targets in the NRSS associated with clear delivery expectations.

In regards to accountability arrangements, the ACRS recommends that:

- reference is made to the “national leadership role” of the Office of Road Safety
- an executive road safety leadership group is established amongst State and Territory governments to provide advice to relevant chief executives and ministers, and that one of the chief executives chairs this group
- an ongoing national stakeholder engagement process is established by the Office of Road Safety.

In the context of improved accountability, and alongside the establishment of a Parliamentary Standing Committee, the establishment of an independent external advisory group to monitor progress and provide advice to government is welcomed. This should be fully funded over the life of the Strategy at an annual rate at least similar to that expended on the Commonwealth Government’s recent Governance Review. This will allow it to perform an independent oversight and advisory role, and can support continued advancement towards our common 2050 elimination goals. It should comprise road safety experts (practitioners and researchers) from a range of disciplines, and provide a direct and independent line of advice to Ministers.

Post-Crash Care

The NRSS has included post-crash care only in relation to rural and remote road safety. Post-crash care is an important pillar in the safe systems approach and while urban performance outshines rural and remote performance there are still many technology and other improvements that can be made. The ACRS would like to see post-crash care elevated to an appropriate level in the NRSS.

Capacity Review

In the Final Report of the Review of Road Safety Governance Arrangements it was assumed that a road safety capacity review would be undertaken.

“Road safety management capacity reviews are planned at national and state levels and these will allow detailed exploration of the complex machinery of governmental and inter-governmental workings. These reviews will assess the readiness for action (including at the local level) against a good practice road safety management framework, to more fully address the governance review’s aims and findings.” (Page V of the Report – Statement from the Independent Reviewers)

The lack of any systematic assessment of road safety management capacity across Australia, and the delivery of plans to address identified capacity gaps, will undermine the prospect of success of the NRSS.

Social Model

The draft NRSS includes a range of points set out within a social model, where responsibility for road safety is vested in the entire community, individually and collectively. Some concern has been expressed about the prospect of the social model allowing for the return of a ‘blame the driver’ individual responsibility approach. While this may not be the intention it is unclear how the social model will work and how it is to be applied to

road safety. More detail is required on the social model approach and how it is to be applied to avoid this unintended side-effect.

Movement and Place

The Movement and Place town planning framework emphasises good design as essential for creating better places and environments for people and communities, but it does not mention safety. Good design may not actually incorporate safe design. In this regard the inclusion of movement and place appears to be too prominent in the draft NRSS and would be better placed at an action plan level. Notwithstanding, it is difficult to determine from the Draft exactly what impact movement and planning has or will have on the NRSS – more information is needed.

Action Plans

The ACRS is concerned that with the NRSS still under development and open for comment, there has been no opportunity to review the associated Action Plans. The completion of the NRSS would be significantly boosted by the release and review of the draft Action Plans and the opportunity for the road safety community to provide comment.

NRSS Funding

The Federal Government committed to a significant increase in road safety funding in 2020. An important element of the management of and accountability for this and other funding is the proper allocation of funds against NRSS priorities. The NRSS is largely silent on how funding might be applied. A lack of information on how actions are to be funded is a significant omission from the NRSS.

Integration of State/Territory Road Safety Strategies

The ACRS is aware that many of the state/territory jurisdictions have produced local road safety strategies. It is unclear how the NRSS might enmesh with those local strategies and where common ground, compatible performance measurement and appropriate accountability might be found. There is a risk here in that the lack of integration might result in mistakes apparent in the 2011-2020 National Strategy being revisited. The ACRS believes that this requires more work and greater clarity if the NRSS is to succeed.

Evidence-Based Research

The draft NRSS includes brief references to future focussed research and development but does not articulate what the focussed research and development needs are. An evidence-based approach to the management of road safety depends critically on research. Coordination of research efforts is also invaluable. There needs to be greater emphasis on these points in the draft NRSS.

Road Safety Management

As noted, we welcome the inclusion of workplace safety as a key element of reform great steps have been taken in this field in recent times, but there is still much more that can be achieved. The enhancement of the safe systems approach should also be a high priority in the NRSS. This extends beyond workplace safety to the development of safe systems across industries. The safe system approach in aviation is an excellent example. Its aim is to prevent errors occurring due to the system rather than focusing only on reducing the consequences of errors. Projecting forward to our common goals of elimination by 2050, we must revise our current conceptualisation of safe systems in road traffic to emphasise more human user-centric design of the system to prevent errors, and not simply accommodate the errors which currently occur.

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Recommendations from the Inquiry into the National Road Safety Strategy 2018

1. *Create strong national leadership by appointing a Cabinet minister with specific multi-agency responsibility to address the hidden epidemic of road trauma including its impact on the health system.*
2. *Establish a national road safety entity reporting to the Cabinet minister with responsibility for road safety.*
3. *Commit to a minimum \$3 billion a year road safety fund.*
4. *Set a vision zero target for 2050 with an interim target of vision zero for all major capital city CBD areas, and high-volume highways by 2030.*
5. *Establish and commit to key performance indicators in time for the next strategy that measure and report how harm can be eliminated in the system, and that are published annually.*
6. *Undertake a National Road Safety Governance Review by March 2019.*
7. *Implement rapid deployment and accelerated uptake of proven vehicle safety technologies and innovation.*
8. *Accelerate the adoption of speed management initiatives that support harm elimination.*
9. *Invest in road safety focused infrastructure, safe system and mobility partnerships with state, territory and local governments that accelerate the elimination of high-risk roads.*
10. *Make road safety a genuine part of business as usual within Commonwealth, state, territory and local government.*
11. *Resource key road safety enablers and road safety innovation initiatives.*
12. *Implement life-saving partnerships with countries in the Indo-Pacific and globally as appropriate to reduce road trauma.*

Recommendations from the Review of National Road Safety Governance Arrangements 2019

1. *The Australian Government has not provided sufficiently strong leadership, coordination or advocacy on road safety to drive national trauma reductions. The Transport and Infrastructure Council (TIC) has not been used to enable cross-jurisdiction decision-making to drive the national harm elimination agenda.*
2. *The Safe System approach has been adopted but not ingrained or mainstreamed within government business by federal, state, territory or local governments. TIC is the ideal forum to drive meaningful mainstreaming of road safety and integrate Safe System principles. Work to mainstream the Safe System approach could be led through the Road Safety Strategy Working Group which all TIC members directed to be instituted in November 2018.*
3. *A fundamental and critical finding of the review is that road safety teams at all levels of government lack influence across the Safe System pillars and within their own organisation. For example, road safety teams lack influence over transport infrastructure design; planning; operation; maintenance and funding teams; and road transport infrastructure investment decisions, which do not include or retain Safe System treatments. Better integration of road safety teams into these decisions is essential if Safe System principles are to be embedded in road safety decisions. The Australian Government can play a significant role in driving these connections through its partnership agreements with states and territories.*
4. *Road infrastructure funding is not conditional on the inclusion of Safe System treatments in every project. Adding this condition would save lives and prevent expensive retrofitting of measures after projects are completed. This is critical in order to achieve a step change in embedding Safe System principles.*
5. *Local government, despite owning the majority of all Australian roads, is not sufficiently engaged or resourced to deliver road safety. Local government is in an unenviable position, being dependent on state legislation for its authority and revenue; limited in its ability to commit to sustained road safety outcomes in its areas; and with a significant proportion of fatalities occurring on its roads.*
6. *The speed of legislative change to incorporate safety features into vehicle design is under increasing pressure from new technology. This poses challenges for road users and for regulators across all levels of government who need to ensure vehicles meet community and government safety expectations. The Australian Government is responsible for leadership in this area and must lift its efforts to improve the uptake of new safety technology in the Australian new vehicle fleet.*
7. *Road safety data is one source of performance information, but 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 and performance will provide a results framework and support the objectives of the next NRSS. This is where the Australian Government could lead through the Office of Road Safety.*
8. *Further work, with all jurisdictions, is necessary to explore the utility of a national no-blame investigator for heavy vehicle crashes and determine the viability and likely effectiveness of a program to identify trends or systemic failings.*

