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Dear Ms O'Neill

RE: NATIONAL ROAD SAFETY STRATEGY – RESPONSE TO THE CONSULTATION DRAFT

Transurban is pleased to provide a submission in response to the draft National Road Safety Strategy 2021-2030.

Transurban is an active contributor in Australia's road safety efforts, committed to achieving a transport system free from fatalities and life changing injuries. Our mission is to strengthen communities through transport. To that extent, we have adopted the safe system approach to underpin our health, safety and environment strategy, with our road safety activities focused on the design, construction, operations, maintenance and support for users of our networks and how we interface with the broader transport system. We report on our performance against the United Nation's Sustainable Development Goals in our [Corporate Report](#) and [Sustainability Supplement](#).

We have made submissions to the Inquiry into the National Road Safety Strategy, co-chaired by Associate Professor Jeremy Woolley and Dr John Crozier in 2018, and the Joint Select Committee Inquiry on Road Safety in January 2020. These submissions provided an overview of our road safety strategic framework, examples of our work to support the previous national strategy and those of our state partners, and priorities for consideration in the next strategy and action plans. Since our response to these inquiries, Transurban has progressed several road safety initiatives that support the draft strategy and its action plans, as outlined below.

We have also identified opportunities to strengthen Australia's road safety response, which are generally reflected in the draft National Road Safety Strategy 2021-2030. Additional recommendations for consideration are included in this letter.

Transurban road safety initiatives

1. *Research*

Transurban Road Safety Centre at NeuRA

Transurban has entered into a second three-year partnership with [Neuroscience Research Australia \(NeuRA\)](#) to undertake a research program focusing on eliminating motorcyclist pelvic injuries, addressing child safety in cars, and improving older driver and passenger protection.

This research has already found potential improvements in child seats, which the Australian Standards Committee is in the process of reviewing, while new protective equipment for motorcyclists may help improve rider safety.

Research findings from these projects will inform policy, regulation and standards as our transport system transforms through technology aimed at improving the safety of all road users, but which also presents risks in human interaction and reliance.

Industry engagement, support, and sponsorship for road safety research, such as our partnership with NeuRA, is critical to the safe system approach and the social model outlined in the draft strategy.

On road trials

Transurban has conducted a number of on road studies and trials aimed at improving the safety and performance of road infrastructure.

Transurban has shared its findings of '[Connected and Autonomous Vehicle \(CAVS\) Trials](#)' undertaken in 2018 and 2019. The trials provided insights into the behaviour of vehicle technologies and road infrastructure to ensure network readiness as the vehicle fleet renews with driver support and automation features such as lane keep assist, autonomous emergency braking and adaptive cruise control. Video footage from our ausRAP assessments has also been shared with [Austroads](#) for its project to rate road markings for a network of connected and autonomous vehicles.

Transurban continues its program of on road trials including:

- evaluating the benefits and challenges of speed harmonisation to manage congestion and safety
- 'green' or eco driving to reduce fuel consumption, road wear and tear, and improve driver behaviour (such as reducing tail-gating), and
- assessing driver behaviour in tunnels using virtual reality to inform countermeasures to improve safety.

The outcomes of these trials can inform policy, regulation and standards in how we design, construct, operate and manage our road network.

Scientific research, data and analysis

Transurban continues to utilise road safety experts to understand the safety issues on our roads and interfacing networks to ensure a clear evidence base to reduce or eliminate the risk to road users. For example, Monash University Accident Research Centre (MUARC) undertakes a crash analysis of Transurban's Australian assets and compares the rate per 100 million vehicle kilometres travelled (VKT) with comparable roads. Understanding the attributes of our road network that result in a safer performance can support decision making by governments on the measures that can be implemented system-wide to create a safe network.

Transurban has access to rich datasets including speed, lane compliance, near misses and vehicle profiles (passenger, commercial and heavy vehicles). A good example of the benefits derived from this, is how we combine the experience of the Traffic Control Room Operators with our rich datasets to observe trends and help change behaviour; most recently through the work with the food delivery industry to change the training and onboarding of delivery partners to help reduce the number of delivery riders using our tunnels.

Analysing this data informs and supports traffic and safety interventions including infrastructure, technology, enforcement, communication and behaviour change programs to support safe use of the network.

Transurban works with research institutes and industry associations to understand the safety benefits derived through dynamic road environments using lane use management systems (LUMS) and intelligent transport systems (ITS) that can inform new and contemporary standards to ensure the safety of all those who use and work on the road.

Engaging with scientific experts, partnering with industry and seeking out 'real time' datasets will inform the national road safety strategy and ensure action plans are evidence based with the best opportunity of achieving targets.

2. Embedding safe system into the Transurban business

Building safe system capacity

Transurban has recently delivered a bespoke safe system professional development program for its employees. The program was a co-design process led by Associate Professor Jeremy Woolley with employees across our operations, major projects, safety, technology and corporate functions. Owing to COVID-19, the program was delivered to 150 employees through webinars and is now available to all employees through an eLearning module.

Since 2017, Transurban has conducted a road safety community of practice that aims to harness road safety ideas and build capability in the safe system approach. We also have quarterly speakers presenting research and programs that align with the safe system approach. Examples include cyclist safety, human factors, heavy vehicle technologies, road policing and road worker safety.

Building capacity in the safe system is critical to embedding road safety in government and industry, the sectors that have the primary responsibility for road safety. Scientific and evidence based research programs must underpin capability development to ensure the focus and funding is allocated to what we know works in road safety. Transurban would be happy to share our program to support industry to understand and embed the safe system approach in their businesses.

Road worker safety

Transurban's greatest risk is our employees and contractors who work on the network providing incident response, maintenance, road works, intelligent transport systems (ITS) and construction.

Transurban is at the forefront in traffic management requirements that are established through procurement utilising tools such as:

- safe system assessments and road safety audits
- innovation in traffic management and road worker safety, such as our ongoing investigations and developments in self-deploying robotic traffic cones ([robocones](#)) and [automated truck mounted attenuators](#), and
- participation in industry working groups to share data, expertise and support the development of interventions that will eliminate injury risk to road workers and create an environment for safe driver behaviour.

Partnering with industry is critical to addressing the greatest risk for road workers and those whose workplace is a motor vehicle. Industry has a wealth of knowledge and data to inform the strategy and its action plans.

Vehicle safety

Monash University Accident Research Centre (MUARC) has analysed crashes on Transurban's roads and compared our safety performance to 'like roads'. The analysis shows the predominant crash types on Transurban's road are rear-end crashes and incidents involving lane change/swiping. These crashes are consistent with distracted/inattentive driving. Further, given our roads are well suited to the freight task, crashes involving heavy vehicles are also a key area of focus.

Technologies including autonomous emergency braking, lane keep assist (and lane departure warning or blind spot detection) reduce crash risk and the severity of crashes when they do happen.

Transurban has engaged with ANCAP Safety to promote the benefits of safer vehicles, most recently sharing its key messages about the poor safety ratings of light commercial vehicles, specifically vans. Promoting these results and messaging to our key account customers contributes to influencing a safer vehicle fleet across the whole network.

We also work closely with trucking associations on key messages to the community about how to safely interact with heavy vehicles. Our most recent activity relates to truck blind spots and was promoted in conjunction with state trucking associations via social media, direct customer communications and roadside billboard signage.

Significant reductions in injury crashes will rely on the uptake of safe vehicles, removing unsafe vehicles from the network and establishing an evidence based strategy for connected and autonomous vehicles. It is critical that industry experience and expertise informs the strategy and contributes to the action plans.

Risky behaviours

Transurban works with our state partners, policing agencies and the media to address risky behaviours on our roads and the broader network. Transurban's 5.5 million Australian customers collectively make around two million trips on our roads every day, allowing us to gain insights through our rich data and on road technologies to raise awareness and opportunities for behaviour change for a range of issues including truck over heights, pedestrians, distracted drivers, and use of emergency lanes. Our road safety messages are promoted through our customer communications, social media and have been watched millions of time on mainstream media.

A good example of how we engaged with the community on risky behaviours was during COVID-19 restrictions, where increased speeding was observed across the whole network and incidents involving lost loads spiked, possibly as the result of a boom in DIY home renovations. During this time Transurban arranged for stories discouraging these behaviours to air on prime time television in Melbourne, Sydney and Brisbane. This was supported by promoted social media posts and stories in quarterly customer newsletters.

Partnering with industry on evidence based road safety information educates motorists, the broader community and contributes to behaviour change.

Response to Draft National Road Safety Strategy 2021-30

To ensure the new strategy has the best opportunity to reach the interim 2030 targets and the ultimate result of zero serious injuries and fatalities by 2050, Transurban submits recommendations relating to the following themes:

Governance and accountability

The draft strategy references the role of levels of government and their agencies and identifies a potential external advisory group.

Transurban fully supports an independent advisory group that is made up of road safety experts. This group would support the refinement of the strategy over time (given the statement indicating a need to review and potentially adjust priorities and actions under 'data' on page 19), support the development of the action plans and establish the scientific basis for interventions and an evaluation framework.

Although not included in the draft strategy, previous reviews of Australia's road safety performance have recommended the establishment of a Joint Select Committee. Transurban supports this and recommends establishing such a committee to ensure the strategy and action plans remain bipartisan.

Roles and responsibilities

Throughout this submission, we have highlighted the need to engage with industry and utilise scientific and road safety experts to ensure the strategy has the best chance of achieving its objectives and targets.

Given the diversity at local and state government level, the Australian Government's role in ensuring that infrastructure standards respond to contemporary research and evidence is of the highest priority so that roads, cycle lanes and pedestrian facilities eliminate the risk of serious injury and death.

This includes human centred design, funding tied to safety and the requirement for tools such as safe system assessments and human factors integration plans to be fundamental throughout the life cycle of transport infrastructure.

The Australian Government's role in ensuring the early adoption of vehicle safety features and performance-based principles for heavy vehicles is critical for meeting the targets.

Data

As previously mentioned, Transurban has a rich source of data from our tolling and monitoring systems. There are also new sets of 'real time' data available such as near miss, vehicle type and age and road usage. Ensuring these are accessible is critical to understanding safety issues that have been 'unseen' until a crash occurs and the best opportunity to allocate resources and efforts to eliminating the risk.

These new data sources will also inform reviews of standards, evidence for procurement of maintenance and construction requirements and can be modelled in cost effective ways to determine the most effective intervention to eliminate the crash risk.

Partnering with industry on research programs, data access and trials of road safety interventions is a clear demonstration of the safe system approach and the social model adopted that underpins the draft strategy. Ensuring industry's engagement in the strategy and action plans will be an important step in realising the social model as intended.

Movement and place

Much work has been undertaken with communities to improve safety through speed management and this directly reflects the movement and place focus of the strategy.

However, speed limit setting across the network remains inconsistent and creates confusion with road users. For example, speed limits on rural roads are unsafe where there is poor line marking, no shoulders or safety barriers when compared to the same speed limit on multi lane separated and barriered motorways such as those operated by Transurban. Another example is in urban environments, where cyclists and pedestrians are the predominant users. Speed limits should be no higher than 40 km/h, yet many streets have 60 km/h limits.

Transurban operates urban motorways that alleviate congestion on the arterial network, particularly during peak hours, and are well suited to the freight task, providing critical transport routes and links. We are also committed to creating community amenity for cycling and walking, as demonstrated through our current and recent projects in the 'bike parks' as part of the Logan Enhancement Project in Brisbane, WestConnex St Peters Interchange in Sydney and the West Gate Tunnel veloway and cycling paths in Melbourne.

Using examples such as those described above supports community understanding of speed management and speed limit setting as part of the movement and place focus of the draft strategy.

Cultural change

Throughout this submission, Transurban has provided many examples of how we engage with the community, our customers, partners and key stakeholders.

Partnering with and utilising the reach of industry in the community will accelerate cultural change, where real world examples are in abundance. Examples include:

- road worker safety risk
- infrastructure suited to high speeds such as motorways and for low speeds such as local neighbourhoods, and
- the expectation and understanding of the safe system approach – the forgiving nature to accommodate human mistakes – and that primary responsibility for this remains a shared responsibility.

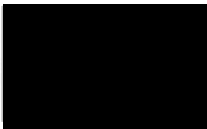
The interpretation risk of the social model is to revert to ‘blaming’ the road user.

The Australian Government has a significant role in ensuring the appropriate governance, funding and bipartisan commitment to this long term strategy that will result in achieving the 2030 target and zero serious injuries and fatalities by 2050.

Transurban looks forward to actively participating in the National Road Safety Strategy 2021-30 and the associated action plans.

Please do not hesitate to contact me if you would like to discuss this submission or require further information.

Yours sincerely



Elizabeth Waller
Road Safety Manager

