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Submission to: National Road Safety Strategy 2021-30 – Consultation Draft

Introducing Roads Australia

Roads Australia (RA) is the peak body for roads within an integrated transport system, representing an industry that contributes \$207 billion annually to the economy and supports 1.3 million jobs. RA has over 150 members and brings industry, government, and communities together to lead the evolution of Australia's roads, integrated transport and mobility.

Roads Australia and road safety

Roads Australia welcomes the opportunity to make a submission on the National Road Safety Strategy 2021-30. RA and our members were involved in the earlier consultation work and it is pleasing to see several matters that we have been raising for some time being addressed in this consultation draft.

RA's comments in this submission focus on key priorities outlined in the consultation draft, namely infrastructure, planning and investment, regional roads, remote roads, heavy vehicle safety and workplace road safety.

Infrastructure, planning and investment

RA has been a consistent supporter of increased investment in road infrastructure to deliver improved road safety outcomes. This can be achieved through programs like the Commonwealth Government's \$2 billion Road Safety Program, which is delivering low-cost road safety improvements such as better road markings, shoulder sealing, new barriers, better signage and other works. It can also be achieved by improving road quality and ensuring that the safe system approach is embedded into all new road projects and upgrades.

As outlined by the International Road Assessment Program (iRAP) improving the standard of our roads can lead to significant improvements in safety outcomes, with a person's risk of serious injury or death approximately halved for each additional star in a road's rating.¹ Investing in our roads, especially regional and remote roads, to lift their standard will save lives and reduce the economic and social cost of road trauma in our communities.

¹ <https://www.irap.org/3-star-or-better/>

The Australian Automobile Association's (AAA) 2013 assessment of Australia's major highways, while dated, indicates investment of approximately \$4.7 billion would bring 85 per cent of the national highway network to a standard of 3-star or above² for car occupants. These improvements alone are estimated to prevent more than 36,000 fatalities and serious injuries nationally over a 20-year period, highlighting the benefit of investing in road safety.

RA supports the continued investment by all Australian governments in lifting the safety standard of Australian roads and the delivery of other road safety improvements.

Given record levels of funding are now flowing into new road projects in the wake of the COVID-19 pandemic, it is imperative that governments use this opportunity to embed and elevate enhanced safety - not only for all of the users of a new road (e.g., pedestrians, cyclists, light and heavy vehicle drivers) but also for those engaged in the design, construction and continuing maintenance of road infrastructure. There is more detail around this particular aspect (road worker safety) in the section on **workplace road safety** below.

Apart from stipulating road safety targets in the development of new road design, there are other ways governments can enhance safety. One of the simpler ways is to allow more time in the design phase of new infrastructure, which permits engineering firms to innovate and determine how they might be able to deliver improved project outcomes, such as safety. As a part of the development of our *Procurement Reform Report*³, RA members reported that the design phase is frequently not long enough for innovative options to be fully considered in the development of new roads. A longer design phase would enable a fuller exploration of these options and promote more positive outcomes for industry and the community.

In light of the focus on major and regional roads infrastructure delivery over the next 5 to 10 years, government and industry should be using this opportunity to improve the safety of the workforce delivering transport infrastructure, and the safety of road users, including as a result of the traffic management plan implemented during construction activities.

RA recommends that government procurement practices for major and regional transport infrastructure should require construction bidders to identify opportunities for additional safety enhancements in their bid document and provide them with the time in the design phase to allow for the development of these innovative safety measures.

There are also new technological aspects that will assist in the reduction of road trauma now and into the future. Digital engineering is being embraced in road projects across Australia. By interrogating the data produced through the use of digital engineering and linking this to safety outcomes on our roads, safer design decisions and products will be able to be made in the future.

² Australian Automobile Association, Star Rating Australia's National Network of Highways, 2013 <http://ausrap-data.flywheelsites.com/wp-content/uploads/2016/12/AusRAP-Star-Rating-Report-2013.pdf>

³ Roads Australia, Procurement Reform Report: Recommendations & Strategies, September 2020 https://roads.org.au/LinkClick.aspx?fileticket=1iZ4QL_itcc%3d&portalid=3×tamp=1600849620248

Additionally, given the continued development of automated vehicles (which will significantly reduce human error and resulting trauma on our roads) now is an appropriate time to ensure that regulations, standards and other matters are being implemented so that our roads can accommodate automated vehicles. Work already undertaken has pointed out that some road designs, and lack of (or poor) maintenance of features such as linemarking, can create issues with the technology used to guide automated vehicles⁴. By being aware of these issues we can make sure that our roads are ready for these vehicles as soon as they become available, rather than waiting for rectification works to occur later.

Regional and remote roads

With the majority of road related fatalities occurring on regional and remote communities, it is imperative action is taken to improve the safety of these roads.

Under the United Nations Global Road Safety Performance Targets⁵, international consensus was reached on delivering new roads and improving existing roads to meet certain road safety criteria. This was reflected in the National Road Safety Action Plan 2018-19⁶ which targeted improvements to achieve 3-star AusRAP ratings or better for 80% of travel on state roads and 90% of travel on national highways.

As mentioned above in the **infrastructure, planning and investment** section, improving the standard of regional and remote roads will have a significant positive impact on the road toll. According to data from iRAP's Big Data Tool⁷, around 35% of travel on the assessed Australian road network still occurs on roads rated at either 1 or 2 stars. Greater efforts should be made to reduce this percentage as quickly as possible by improving the safety of regional and remote roads.

Evidence of improved safety outcomes from the upgrade of regional roads is clear from projects such as the Bruce Highway upgrade in Queensland⁸ and the Midland Highway in Tasmania. While these state managed roads are being addressed, more work needs to occur with local governments, who are the custodians of the largest part of the road network, to assist them in improving the quality of roads under their management.

Where significant work to upgrade a road is not likely to occur in the short-term, attention should then be focussed on the installation of low-cost road treatments (as mentioned previously) and the use of new technological solutions, such as Side Road Activated Speed Signs⁹ to deliver improved safety outcomes.

Additionally, fatigue is an issue on Australian roads, especially on our regional and remote roads. Increasing the number of adequate and attractive rest sites designed to be suitable for use by light and heavy vehicle drivers will reduce fatigue related crashes.

⁴ <https://www.arup.com/projects/connected-and-automated-vehicle-trials-program-vic>

⁵ https://www.who.int/violence_injury_prevention/road_traffic/12GlobalRoadSafetyTargets.pdf

⁶ Transport and Infrastructure Council, National Road Safety Action Plan 2018-19, May 2018 https://www.roadsafety.gov.au/sites/default/files/2019-11/national_road_safety_action_plan_2018_2020.pdf

⁷ <https://www.vaccinesforroads.org/irap-big-data-tool/>

⁸ <https://www.irap.org/2018/02/bruce-highway-queensland-australia-upgrade-given-top-marks-for-safety/>

⁹ <https://www.arrb.com.au/news/side-road-activated-speed-signs>

The Office of the National Rail Safety Regulator (ONRSR) is currently developing a National Level Crossing Portal that will provide a significant data set for making decision around safety investment. RA recommends that this data should be used by Australian government to prioritise the removal of high-risk level crossings, particularly in regional areas. This will improve safety on both the road and rail networks.

RA supports funding to remove high-risk level crossings in regional areas.

The development of a Regulatory Impact Statement on reducing the open road default speed limit on regional roads is welcome and should be extended to examine remote roads and unsealed roads. While that process takes place, a continuing effort should be made to educate all road users, no matter their home location, to drive at a speed that best matches the variety of conditions they may face in regional and remote areas. In particular, it is important that such efforts emphasise that the speed limit is an upper guide, not a target.

The safety benefits of a reduction in speed limits will only be achieved if the community complies with the posted limit. This compliance is more likely if the community better understands the rationale for reducing speed limits and their role as part of a broader Safe System approach (for example school speed zones, strip shopping centres).

RA encourages the Office of Road Safety to ensure remote roads and unsealed roads are included as part of any Regulatory Impact Statement development into the open road default speed limit.

There also exists a need in regional and remote areas to improve the response time to crashes on the network, which was raised in the stakeholder engagement sessions for the Strategy, but doesn't appear to have been picked up in the current draft.

Quick and responsive first aid at a crash scene can save lives, but in regional and remote areas of Australia professional emergency services response times can understandably be much higher than in urban areas. RA understands the Northern Territory government is working with members of the public and the transport industry, for example through St John NT's *First@Scene* training courses, to train people so they are able to provide appropriate first aid, call in paramedic services and control and secure a crash site.

Innovative ideas such as this should be recommended in the Strategy, to deliver improved survivability for when crashes do occur on in regional and remote Australia.

RA encourages the Office of Road Safety to include actions to improve post-crash response in regional and remote areas to deliver improved survivability.

Heavy vehicle safety

Transport for London developed the Construction Logistics and Community Safety (CLOCS) standard for construction logistics, as their research showed that trucks were involved in a high number of cyclist and pedestrian fatalities in London. The standard, which was taken up by the UK construction industry, provides a framework to help eliminate road fatalities involving trucks and plant equipment involved in construction projects.

RA recommends the government infrastructure delivery procurement practices should include extended design time to allow for the development of innovative safety enhancements.

Australia has since seen a similar program¹⁰ (called CLOCS-A) established based on this UK experience.

With the increased number of transport infrastructure projects underway in Australia accompanied by an increase in the number of related truck and plant movements, it is important that work continues to deploy these standards, and enhance them where necessary, to protect all road users from the associated safety risks.

Workplace road safety

As mentioned earlier, recent years have seen a large increase in the size of the transport infrastructure construction and maintenance, with more expected due to the stimulus response to COVID-19. RA has set up a Road Worker Safety Working Group to develop new and enhanced measures to improve the safety of workers on these transport infrastructure sites, especially where they interact with the general public.

Importantly, RA believes that there needs to be better data collection around incidents involving road workers, and that the new Data Hub in the Office of Road Safety should collect and analyse this information. While RA has been made aware of at least 3 fatalities of road workers in the last 9 months from conversations with our members, there is no centralised repository or formalised reporting of this information. In the collection and analysis of this data, the Office of Road Safety may wish to consult with Safe Work Australia as well as relevant government, industry and insurance bodies.

RA recommends the collection and formalised reporting of safety incidents involving road workers on Australian roads.

In addition to the recommendations made in the **infrastructure, planning and investment** section of this submission, one other measure RA is currently working on with Australian governments is to amend the procurement assessment process for projects by separating out the safety aspects, and the associated costs, for project bids. In this way, applicants who wish to provide a higher safety standard on a project will not find themselves unnecessarily disadvantaged if they provide a higher cost due to those enhanced safety measures.

¹⁰ <https://www.clocs-a.com.au/>

A technology-based response that has been deployed with some success internationally is to increase the use of digital engineering on transport infrastructure projects and to deploy sensors that monitor real-time movement and speed in and around work sites.

Using digital engineering principles, a detailed 3D map (and 4D which allows changes over time to be animated) of a site can be made and adjusted in a virtual environment. Having access to these “digital twins” reduces the workers exposure to safety risks on sites as this work can occur in an office away from traffic flows.

Continued community education needs to occur regarding temporary speed limit reductions in and around work sites. The reasons for these speed limit reductions may not always be obvious to passing drivers, who then may then decide it is “safe” to travel beyond the posted speed limit because they are not aware of any reason not to. Research shows that, broadly speaking, when people understand the risks, and understand why a lower limit is in place, they are more likely to accept it.

Other items

In 2019, the Australian Automobile Association (AAA) brought together twenty-three national and state organisations to develop the Reviving Road Safety¹¹ policy priorities document, calling for urgent Federal Government action to combat Australia’s rising road toll.

The four broad policy areas in the AAA report are:

1. Develop a national road safety data hub.
2. Link federal infrastructure funding to road safety outcomes.
3. Enhance vehicle safety standards and encourage the uptake of safer vehicles.
4. Assign the Office of Road Safety a leadership role and genuine authority.

While there has been some work on these policy priorities, RA recommends that efforts continue in these areas to improve road safety outcomes.

RA recommends the Office of Road Safety continue to work on the delivery of the policy priorities highlighted in the AAA report, Reviving Road Safety.

The Victorian Auditor-General’s Office recently released an audit Maintaining Local Roads¹². This report, although limited to Victorian local government areas, did include metropolitan, outer metropolitan, regional city and regional local councils. This is another report that highlights the need for local governments to improve their skills and capabilities around road asset management. Given limited local government resources they should be supported by federal and state and territory governments to upskill in this area.

On data collection and reporting there is a need for the Office of Road Safety and other government data collection bodies to develop a richer, more comprehensive database. In the case of heavy vehicle data, it has been the information gathered by insurance companies that

¹¹ Australian Automobile Association, Reviving Road Safety, 2019, <https://www.aaa.asn.au/wp-content/uploads/2019/09/AAA-Reviving-Road-Safety-2019.pdf>

¹² Victorian Auditor-General’s Office, Maintaining Local Roads, March 2021, <https://www.audit.vic.gov.au/sites/default/files/2021-03/20210317-Local-Roads-report.pdf>

has been able to provide evidence to support policy changes. This richer dataset is important as it can provide indicators around issues well before serious injuries or fatalities occur. The commencement of the National Road Safety Data Hub is an ideal time to commence collecting and analysing this extra information.

RA has previously offered to work with the Office of Road Safety on stakeholder workshops to standardise and enhance road safety data. This offer of support still stands.

RA believes the advent of the National Road Safety Data Hub should allow KPIs from the next National Road Safety Strategy to be captured and reported.

This will help facilitate a better understanding of the relevant factors impacting crashes across Australia, enabling actions to be better targeted and increasing their likelihood of success.

In relation to targets and KPIs, RA recommends these should be reported and tracked in total numbers, as well as a share of population. Reporting on actual numbers helps to reinforce that these statistics represent real people being impacted. This will add to the transparency and accountability in delivering the Strategy, especially when the real target we would like to achieve in the long-term is zero.

The Office of Road Safety should also ensure that reporting is consistent with the second Global Decade of Action for Road Safety, to reinforce and measure progress against the [12 Global Road Safety Performance Targets](#)¹³. This will allow our progress to be tracked on a global scale.

Education programs need to be continued and reviewed to respond to data and issues. For example, advertising in the 1980s made drink driving socially unacceptable. Similar outcomes could be sought to increase the social cost of engaging in other risky road behaviours.

One area particularly needing stronger awareness education is the requirement to have children aged 4-10 sufficiently restrained when traveling in a vehicle. While many guardians believe, incorrectly, that their child is no longer required to travel in a child restraint once they turn 7 years of age, in fact the law allows children aged 7 years to under 16 years to travel in either an approved booster seat or an adult seatbelt with the most appropriate type of restraint depending on the child's size, not their age or weight.

The adoption of a social model in delivering the Strategy is pleasing. The cost of road trauma goes well beyond the immediate impacts and by applying a whole-of-society model to addressing the issues, the Strategy is also recognising the community-wide benefits that result from reducing road trauma.

In concluding, RA notes that while there is more to be done, Australia has made some significant strides in improving safety on our roads. RA would encourage the Federal Government to share that expertise with neighbouring nations who have not achieved similar progress over recent years, in the interests of enhanced regional and global road safety outcomes.

¹³ https://www.who.int/violence_injury_prevention/road_traffic/12GlobalRoadSafetyTargets.pdf

Conclusion

1. RA supports the continued investment by all Australian governments in lifting the safety standard of Australian roads and the delivery of other road safety improvements.
2. RA recommends that government procurement practices for major and regional transport infrastructure should require construction bidders to identify opportunities for additional safety enhancements in their bid document and provide them with the time in the design phase to allow for the development of these innovative safety measures.
3. RA supports funding to remove high-risk level crossings in regional areas.
4. RA encourages the Office of Road Safety to ensure remote roads and unsealed roads are included as part of any Regulatory Impact Statement development into the open road default speed limit.
5. RA encourages the Office of Road Safety to include actions to improve post-crash response in regional and remote areas to deliver improved survivability.
6. RA recommends the collection and formalised reporting of safety incidents involving road workers on Australian roads.
7. RA recommends the Office of Road Safety continue to work on the delivery of the policy priorities highlighted in the AAA report, Reviving Road Safety.

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Yours sincerely



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