

ACRS Submission



About the Australasian College of Road Safety

The Australasian College of Road Safety was established in 1988 and is the region's peak organisation for road safety professionals and members of the public who are focused on saving lives and serious injuries on our roads.

The College Patron is His Excellency General the Honourable David John Hurley AC DSC (Retd), Governor-General of the Commonwealth of Australia.

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Introduction

The Australasian College of Road Safety (ACRS) is the region's peak membership association for road safety with a vision of eliminating death and serious injury on the road. Our members include experts from all areas of road safety including policy makers, health and transport professionals, academics, community organisations, researchers, federal, state and local government agencies, private companies and members of the public. The purpose of the College is to support our members in their efforts to eliminate serious road trauma through knowledge sharing, professional development, networking and advocacy. Our objectives include the promotion of a collegiate climate amongst all those with responsibilities for and working in road safety; the improvement of relative safety outcomes for vulnerable demographic and user groups within the community; the promotion of post-crash policies and practices; the promotion of road safety as a critical organisational objective within government, business and the community; and the promotion and advocacy of policies and practices that support harm elimination.

The ACRS welcomes the opportunity to comment on the draft National Road Safety Action Plan 2021-2025 and are grateful to be part of the targeted consultation process. With the missed targets from the previous National Strategy, there is a strong awareness within the sector of the importance of the new National Strategy, and the vital role played in the translation of that into action, through the Action Plan. A Strategy Action Plan should provide an outline of how, when and by whom the Strategy objectives will be operationalised and how their success will be measured.

Key Points

ACRS is pleased to see the Strategy's 2050 elimination vision is now supported by a target to reduce the number of fatalities by 50% by 2030, and accept that the rise in serious injuries needs to be halted before a more ambitious reduction target can be set for them.

ACRS is pleased that the Strategy specifies performance indicators, but is very concerned about the disconnect between these and the actions that will impact positively on them and the funding and implementation arrangements to deliver those actions. Targets should be set for the performance indicators.

ACRS is pleased that the Regulatory Impact Statement path for addressing Australia's speed limit problem has been cemented into the Strategy. The RIS process should be used to address the primary problem which is the dangerously high default speed limits, as ACRS has consistently sought, rather than to address secondary problems like unsealed roads and high pedestrian areas (which may prove useful in implementing change). The RIS process can then lead to analytically rigorous options and informed decisions to significantly reduce serious road trauma. The Action Plan text (Item 6) should be clarified to specify that the RIS process **will** be applied to urban and rural default speed limits. Reference to "national best practice guidelines" is inappropriate. Amendments to the Australian Road Rules will be required to implement change.

ACRS is pleased that the Action Plan refers directly to Intelligent Speed Adaptation. The Action Plan text (Item 9) should be clarified to indicate that the RIS process will be applied to this technology, and this should be elevated to a Priority Action.

ACRS welcomes the recognition in the Strategy and Action Plan of “implementation failure” in the past. Notwithstanding the safety intentions it contains, we are therefore very concerned that the Action Plan does not include any timelines or any funding or investment details. To guard against future implementation failure, ACRS urges inclusion of a commitment to commissioning a full and independent review of the first 18-24 months implementation of the Strategy and Action Plan. The review report would be reported directly to the Transport and Infrastructure Council and be published by the Council.

ACRS also urges the inclusion of a commitment within the Action Plan to undertake an analysis of the current investment gap – what investment is required within Australia to achieve the national 2030 road safety targets, and what is the gap between the current investment profile and the required investment?

ACRS welcomes the statement of roles and responsibilities in the Strategy. To reflect and reinforce the critical role it plays, we urge the inclusion of an action for the Commonwealth Government to prepare and publish its own Commonwealth Road Safety Action Plan.

We welcome the decision by the Commonwealth to apply specific safety standards to construction projects/programs which it funds, and note the application of CLOCS – a prescriptive standard developed for construction and logistics. Action Item 12 needs to be widened to also specify ISO 39001 Road Traffic Safety (RTS) Management Systems (the United Nations’ gold standard for road traffic safety management systems) as a means of demonstrating compliance with the Commonwealth’s procurement requirements.(1) Excluding ISO 39001 may create unnecessary compliance costs. Action Item 12 can also be widened by states and territories including ISO 39001 in Austroads’ National Pre-qualification Framework, in a manner consistent with ISO 9001 (Quality) and ISO 14001 (Environmental) requirements.(2, 3)

ACRS response to the Consultation Draft

a) General comments

The Action Plan outlines some positive new directions and initiatives for national road safety policy in Australia and takes on board lessons from the previous strategy. The enabling actions are important and we are pleased to note the inclusion of establishing a Commonwealth Parliamentary Joint Standing Committee on Road Safety, improved data, support to local governments, and increased uptake of technologies. The safety performance indicators are particularly welcome, with their ambitious nature, envisaging and promoting improved national data collection and reporting, rather than seeking only to report on data currently available.

However, the Action Plan is timed to end halfway through the new Strategy period but does not seem to embed concrete and demonstrable progress to that halfway point, towards achieving the overall aims and targets of the Strategy in terms of reduced fatalities and serious injury from road trauma. There are areas where the Action Plan should be strengthened, particularly in relation to clear and concrete wording, and the inclusion of timeframes and indications of funding. Throughout the draft Action Plan, words such as ‘support’, ‘improve’ and ‘increase’ are not specific and do not provide a reference point for where we are now, or where we want to get to in each area. Apparent success may be achieved with little or no real change occurring.

If we recognise that doing the same things as we have done before will not achieve the significant shift in road trauma that Australia needs, we need to clearly outline a significant shift in the actions we will take to get there. The Draft Action Plan makes good progress in this through the inclusion of current and emerging issues such as connected and autonomous vehicles. It would be improved through the strengthening of language and ensuring there are specific actions leading to significant and demonstrable progress towards the goals of the Strategy by the time this Action Plan ends. The lack of provision of these half-way point goal posts risks the efforts during this time losing sight of the end goals and leaving too much work still to be done in the second half of the Strategy.

The links between the various elements of the Strategy and Action Plan are not clear, making it difficult to see how the proposed actions will lead to be stated objectives, and how the indicators will measure this. Mapping of the Priority Actions to the Strategic Areas and the Safety Performance Indicators is essential. For example, the only proposed action to reduce the age of the fleet is in research. While this is an important element in guiding actions, it will not by itself lead to change. The links between the proposed indicators and the 3 headline targets for 2030 in the Strategy, to demonstrate success are not apparent. For example, one of those targets is zero deaths of children 7 years and under. However, there are no proposed indicators relating to actions to achieve this, with nothing directly referencing children in that age group, and no baseline data provided to guide action on the target. If the indicators are to be the main measurement of success of the strategy, these links should be made more clearly and definitively.

Funding is mentioned for only half of the priority action areas (4 - infrastructure, 5 - road safety programs, 7 - driver licensing in remote areas, 10 – Australasian New Car Assessment Program (ANCAP) and Used Car Safety Ratings (UCSR), 11 - Heavy Vehicles Safety Initiatives Program, 13 - speed and infrastructure programs for vulnerable road users, 14 - National Road Safety Partnership Program and other road safety awareness programs, and 15 - targeted innovative research).

While the core accountability for the remaining priority action areas may lie with the Commonwealth and be enacted through existing funding of the Office for Road Safety, each will require action from all levels of government, which is reflected in the proposed accountability. ACRS notes that funding may be required for each of the priority action areas.

The only priority action area with a specification of timeframes is 3 – supporting local governments to develop road safety network plans primarily in the first 12-18 months of this Action Plan. This timing specification is welcome, and ACRS recommends the inclusion of timelines across each of the remaining Priority Action areas.

b) Specific comments

Introduction

The last sentence in the opening page says that the Action Plan was endorsed by Infrastructure and Transport Ministers in May 2021. It may be that this is referring to the Strategy rather than the Action Plan. However, if it does indeed refer to the Action Plan, it may suggest limited potential for changes arising from this consultation process. This should be clarified with wording such as “...will be endorsed by...”.

Enabling Actions

In line with our recommendations to the National Strategy, ACRS recommends that the Enabling Actions include keeping pace with European vehicle safety regulation that encourages evidence-based driver assistive technologies, especially intelligent speed assist and autonomous emergency braking.

Priority Actions

The wording of the priority actions should be strengthened and made more specific to enable proper accountability against performance. The current list is driven by wording such as “lift”, “improve”, “promote”, “reduce” and “work with”. ACRS recommends the actions include targets and timelines.

Safety performance indicators

ACRS welcomes the inclusion of the list of specific safety performance indicators, and the annual reporting of them. The ambitious nature of the list is particularly welcome, as it will facilitate national data development and allow the national reporting of these indicators for the first time. Reliance on currently available data, while simpler to achieve, would have severely restricted the potential benefits of having these indicators.

However, the wording of them is inconsistent, with only the first specifying the direction of change required for success (“increased”) and leaving this vague and without enumeration. While we acknowledge that “in many cases definitions and scope for measurement will need to be established”, the indicators listed under Safe System are particularly vague and ill-defined currently. It is not clear how ‘capacity and capability across all levels of government’ or “support by Indigenous communities” would be translated into something measurable. Similarly, ‘share’ is not defined, and would be improved through the use of more specific terms such as percentage or proportion. Performance indicators should determine the level of performance required for success. The current list of proposed indicators does not determine any levels, because they are not enumerated. In order to be informative of the relative success or not of the Strategy and Action Plan, the indicators need to shift from being statistical indicators to being actual performance indicators – with baselines and targets, to enable measurement towards the intended result. ACRS recommends specification of what would be considered success for change over time in each of the indicators.

ACRS particularly welcomes the inclusion of road network safety ratings in the indicators. We note the allowance for “3-stars (or equivalent risk rating)”. The reliability and validity of these data will be highly dependent upon the definition of ‘equivalent’ and ACRS cautions against any lowering from the internationally accepted iRAP standards.

Given that many of the proposed indicators require new national data collection, the Action Plan needs to outline how this will be achieved. What incentives will be in place for the owners of these data to provide them to a national collection? Further, we note that no reference is made in Action Item 16 to the need for research on the stated performance indicators, which is necessary to establish baseline performance and future targets.

Accountability

The draft Action Plan notes that the proposed safety performance indicators “will be monitored and reported annually”. From the information available in the draft, it is not clear what level of independence there will be in the reporting, to whom the reports will be made, whether or not they will be made publicly

available, and whether or not there is any response from government required to the reports. ACRS recommends the Action Plan include specific reference to independence of reporting, that the reports will be available to the public, timing of reporting being within 12 months of the reporting period, and requirements for response from government.

Priority Action 1

ACRS notes and welcomes the inclusion of establishing a Joint Standing Committee on Road Safety under this Priority Action. However, ACRS strongly recommends establishing an independent, external body for oversight and review, in order to embed strong accountability and governance mechanisms. This body should conduct a review of the first 18-24 months of implementation, with reporting publicly available.

This Action area includes reference to supporting states and territories to implement data linkage projects and processes. ACRS suggests that it may be beneficial to seek advice from accredited Integrating Authority, such as the Australian Institute of Health and Welfare, regarding methods and processes for data linkage in a national data collection. The action should also reference analysis of the data, including availability of linked data to researchers for more detailed and sophisticated analysis than is practicable in annual reporting.

Priority Action 2

ACRS notes and welcomes the inclusion of the collection and sharing of road safety data on Indigenous representation in fatalities and serious injuries. We recommend that the Action Plan clearly articulate that all performance indicators with people as the unit of measurement, will be disaggregated by Indigenous status where possible. It would also be helpful for this priority action area to specify the inclusion of Aboriginal and Torres Strait Islander peoples in both regional/remote and also urban areas, to ensure the issues in both settings are addressed.(4, 5)

Priority Action 3

ACRS notes and welcomes the inclusion of a timeline in this Action area, for the development of local government road safety network plans. We recommend that all priority action areas include timelines. It would also be helpful to clarify that local government risk assessments data will be included in the national data hub.

Priority Action 4

ACRS notes and welcomes the inclusion of an assessment and evaluation framework for road safety infrastructure investment. However, the specific actions and responsibilities in this priority area are not clear from the draft, which should have the wording clarified and strengthened. The failure to address the lack of essential public safety information on the safety of the road network through the United Nations recognised and promoted safety star rating system is a major gap in the Strategy, representing a public policy failure. The Action Plan must at the very least recognise the need for a future pathway to publishing this essential public safety information on the safety of the road network.

Priority Action 5

This action area includes reference to 'popular motorcycle routes'. ACRS recommends this be extended to 'popular motorcycle and cycling routes' to reflect the continuing trauma rates for cyclists.(6, 7) The

description and actions in this priority area should clarify if they are designed to target run-off road and head-on crashes specifically.

Priority Action 6

The actions included in this priority area would be improved by the inclusion of clearer justification of how and why they have been chosen. For example, technologies supported should be specified as being evidence-based technologies. The speed management action would be improved through better alignment with the Strategy in regard to the development of a Regional Impact Statement on reducing speed limits. The Action Plan text (Item 6) should be clarified to specify that the RIS process **will** be applied to urban and rural default speed limits. Reference to “national best practice guidelines” is inappropriate. Amendments to the Australian Road Rules will be required to implement change.

Priority Action 7

One of the specific actions in this priority action area is to ‘increase understanding and availability of safer vehicle choices’ for Aboriginal and Torres Strait Islander people in remote areas. However, in order for such understanding and availability to translate into a reduction in the age of the fleet in remote areas, affordability will also need to be addressed. It is not clear from the proposed actions how this would be achieved. This action area should also be extended to include non-Indigenous people, to reflect road safety issues in remote areas of Australia generally, as well as specifically for Indigenous people.(8)

Priority Action 8

ACRS notes and welcomes the action to improve best practice and enforcement of minimum passing distance. We recommend driver fatigue be added as a high-risk behaviour to this priority area. Driver fatigue is complex, with limits to the effectiveness of technological solutions.(9, 10)

Priority Action 9

The listed actions under this area prioritise lane keep assist and driver drowsiness and inattention warnings over intelligent speed assistance, eCall, enhanced vision systems and reversing detection. The Action Plan would be improved through a clarification and justification of how these prioritisations were chosen, and specifying that all technological solutions would be evidence-based. The Action Plan text (Item 9) should be clarified to indicate that the RIS process will be applied to Intelligent Speed Assist, and this should be elevated to a Priority Action.

Priority Action 10

This priority action area includes the promotion of published safety ratings for MotoCAP safety ratings of motorcycle protective clothing, CRASH ratings of motorcycle helmets, and the Child Restraints Evaluation Program, as well as the ANCAP and UCSR. ACRS recommends that the publication and promotion of infrastructure safety star ratings through iRAP be added included.

A specific action to promote vehicle technology and safety equipment with high safety benefits is welcomed. ACRS recommends that this specify ‘evidence-based’ technologies to ensure well designed and functionally useable technologies are adopted.

Priority Action 11

ACRS notes and welcomes the action to provide safe bike paths and alternative routes for vulnerable road users where the risk of heavy vehicle conflict with vulnerable road users is high.

Priority Action 12

ACRS supports the use of procurement processes to improve the safety of the road traffic system, and has questioned over the course of this strategy setting process whether this will be addressed by Austroads, and whether SafeWork Australia will assume responsibility for the number one fatal injury issue in Australian workplaces. We welcome the decision by the Commonwealth to apply specific safety standards to construction projects/programs which it funds, and note the proposed application of CLOCS – a prescriptive standard developed for construction and logistics. Action Item 12 needs to be widened to also specify ISO 39001 Road Traffic Safety Management Systems as a means of demonstrating compliance with the Commonwealth's procurement requirements.(1) Action Item 12 can also be widened by States and territories including ISO 39001 in Austroads' National Pre-qualification Framework, in a manner consistent with ISO 9001 (Quality) and ISO 14001 (Environmental) requirements.(2, 3) Reference to safety of road construction sites or to generic work health and safety requirements are insufficient and do not meet the need to demonstrate commitment to Australia's national road safety vision.

ISO 39001 was developed within the United Nations system (the International Standards Organization) and is recognised internationally as the gold standard for road traffic safety management systems. It is directly linked with a globally recognised auditing and certification system, is non-prescriptive, and was prepared in a manner that is relevant to all organisations wishing to support Australia's vision of eliminating fatal and serious injury on the road. Thousands of Australian organisations are certified to ISO 9001 Quality Management Systems, making it easier for ISO 9001 certified companies in the construction industry to achieve meaningful compliance with the Commonwealth's procurement requirements for road traffic safety. Not accepting ISO 39001 certification as demonstration of compliance may add unnecessary compliance costs.

Priority Action 13

It may be helpful to clarify that funding to local government for off-road cycling routes is included, to prevent confusion with funding for on-road infrastructure.

Priority Action 14

ACRS supports inclusion of work-related road trauma in the Strategy and Action Plan. It is important to recognise in the text that Vehicles as a Workplace is published **jointly** by Austroads and Work Health and Safety (WHS) regulators as a national guide,(11) hence WHS regulators have primary operational responsibility, not roads and traffic authorities. SafeWork Australia, as the lead national body in work health and safety, has provided no guidance on this subject. An action could be included for SafeWork Australia to go through the process of developing comprehensive guidance on this number one fatal injury issue in Australian workplaces.(12) The primary data issue in this area is the lack of data on the purpose of journey. An action could be included for State and Territory crash data to include a field specifying whether the journey was work-related.

Priority Action 15

This priority action area includes reference to 'cultural change'. The Action Plan may benefit from inclusion of a definition of cultural change, as the actions also include reference to speed management and risky driving behaviours, which may lead the reader to assume that cultural change focuses on individual responsibility. The role of human-user centred road system design in preventing road trauma and enabling cultural change should be recognised and explicitly stated.⁽¹³⁾ Where the action references engaging with a 'broader range of government agencies to develop a whole-of-government approach to road safety', it would be helpful to list some examples of portfolios outside transport and infrastructure, which would be included in such engagement.

Priority Action 16

This priority action area includes a list of possible research topics. It would be helpful to include information on how the final list of priority research topics for funding will be determined.

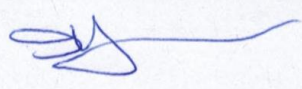
Conclusion and Recommendations

The ACRS welcomes the draft Action Plan 2021-2025 to accompany the National Road Safety Strategy 2021-2030. We are pleased to see the inclusion of several key elements, including improved data, support to local governments, a Parliamentary Joint Standing Committee on Road Safety, the prioritisation of vulnerable road users and uptake of evidence-based technologies.

However, we would like to emphasise the following points:

- Accountability must be strengthened through an independent, external oversight body conducting a review of the first 18-24 months of implementation with public reporting;
- Timeframes, funding and responsibilities must be included in the Action Plan
- Linkages between the Strategy, Priority Action and Safety Performance Indicators should be clarified
- A Commonwealth Road Safety Action Plan should be included

ACRS appreciates the opportunity to provide these comments. Please do not hesitate to contact us should you require any additional information or have any queries about this submission.



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