

ACRS Submission to Mid-Term Review of the National Road Safety Strategy 2021-2030



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 Her Excellency the Honourable Sam Mostyn AC, Governor-General of the Commonwealth of Australia.

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Introduction

The Australasian College of Road Safety 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 road safety as a critical organisational objective within government, business and the community; the promotion and advocacy of policies and practices that support harm elimination; the improvement of relative safety outcomes for vulnerable demographic and user groups within the community; the promotion of post-crash policies and practices; and the promotion of a collegiate climate amongst all those with responsibilities for and working in road safety.

The College believes that we should prevent all fatal and serious injuries on our roads; the road traffic system must be made safe for all road users; system designers should aim to prevent human error and mitigate its consequences; life and health are not exchangeable for other benefits in society; and that all College policy positions must be evidence based.

The College welcomes this mid-term review into the National Road Safety Strategy (NRSS) 2021-2030.

ACRS response to the Consultation

a) What aspects of the NRSS 2021-2030 are working well

The ACRS welcomes and strongly supports the continued commitment to 2030 targets and Vision Zero for 2050. It's important that we have these markers of where we want to be going and what we are aiming to achieve.

b) What aspects of the NRSS 2021-2030 could be improved

Commitment to actually achieving the targets and following evidence-based interventions needs to be improved. The 2018 inquiry report into the failure of the previous NRSS found that one of the major failures was in implementation.⁽¹⁾ It seems we have not learnt the required lessons from that report, as implementation failures continue.

A recent example is the Regulatory Impact Assessment consultation into the review of default speed limits outside built up areas. The recommendation to review these speed limits has been around for years, and we commend the Australian Government on finally acting on that recommendation. However, this was always going to be a sensitive issue, requiring groundwork with the community to explain what was under review and why. That was not done. Instead, the review was conducted with undue haste as the end of the current Action Plan looms. There was significant confusion regarding which roads would potentially be affected by any change, no community education about the risks associated with speed and the actual implications of the proposed change, and the road safety sector (many of whom are small charities) was left to scramble to try to respond.

The evidence is clear that the chances of surviving a head on crash plummet once the speed is more than about 70 km/h.(2, 3) Yet in response to this knowledge we paint a white line down the middle of the road and say – be careful. Or don't even paint a line. It is difficult to think of any other areas of society where that risk assessment would be acceptable. But that reality of physics was not explained to the Australian community. Nor was the fact that roads which can support higher speed limits could still have them. Instead, the confusion and misinformation abounded, and the Infrastructure and Transport Ministers' Meeting responded by making the political rather than evidence-based decision that 'no further work is being undertaken'(4) before the results of the consultation had even been released. The lack of leadership on the issue from the Australian Government and apparent rush to tick off the action before its due date came at the expense of actually giving this important opportunity for road safety(5) the implementation process it deserved.

c) Why are the number of deaths and serious injuries on Australian roads increasing

Road safety is a complex system and there are multiple factors involved.(6) If we had more information such as the 2024 National Road Safety Annual Progress Report (which at the time of writing still has not been released); better data on serious injuries; and regular, national, systematic no-blame investigations of road trauma (the way we do for air, marine and rail transport), we would be in a much better position to answer this question. In the meantime, there are still many evidence-based measures we could be introducing that we know will save lives, but that there does not seem to be the political will to enable.

d) View on the NRSS 2021-2030's themes, priorities and enabling actions

The current NRSS clearly has not created the national commitment and sense of urgency required to address the road safety crisis. Governments must be accountable for the trauma on our roads and their actions or inactions to reduce it.

e) Actions or initiatives that would better support the implementation of the themes, priorities, and enabling actions of the NRSS 2021-2030

The NRSS outlines a framework for achieving substantial reductions in road trauma, but Australia is failing to achieve the implementation standards set out in the strategy itself. Several critical elements – governance, transparency, data quality and lead-indicator monitoring – have not been delivered as promised, leaving jurisdictions and stakeholders unable to assess progress or intervene effectively where performance is deteriorating.

The Movement and Place approach has been inconsistently implemented across jurisdictions, often limited to pilot projects. Despite the clear benefits of lower urban speed limits, pedestrian-centred street design and protected cycling infrastructure for improving liveability as well as reducing road trauma, widespread adoption has not occurred. This would have been supported by a review of the urban default speed limits. The evidence of the benefits of reduced urban default speed limits is very clear,(3, 7, 8) but there is no national leadership for this to occur in Australia.

Recommendations from inquiries into road safety in Australia that remain unimplemented but still relevant are numerous.

From the 2022 report of the Joint Select Committee Inquiry into Road Safety:

- *Recommendation 1 – The committee recommends that a cabinet minister for road safety be appointed. A key responsibility of the minister should be reporting to the Parliament on an annual basis in relation to the performance indicators in the NRSS 2021-2030 and on progress in relation to the goals and priority actions in the NRSS 2021-2030 and associated Action Plans.*
 - The College notes that despite the apparent attempt to increase accountability and transparency in this NRSS 2021-2030, the current mid-term review is being conducted in the absence of a publicly available 2024 National Road Safety Annual Progress Report. This is basic information which should be available to inform this review. The only annual progress report available to the public is from 2023, and the content and format of that report was opaque and difficult to usefully interpret in terms of monitoring progress. The result is that we are being asked to contribute to a mid-term review without any useful information on the safety performance indicators since the NRSS 2021-2030 began.
 - Had the above recommendation to appoint a cabinet minister for road safety with responsibility for annual reporting to the Parliament been implemented, the sector is likely to have been in a better position to contribute to this review.
- *Recommendation 2 – The committee recommends that the Australian Government investigate options to establish an advisory body for the Office of Road Safety, comprising road safety experts and professional organisations*
 - The College notes that the Australian Government’s response to this recommendation included that “At the September 2022 ITMM, ministers agreed that ITSOC will engage with industry stakeholders twice a year on behalf of ITMM to ensure ministers have access to quality advice from industry. The Australian Government will also hold two Ministerial Roundtables on Road Safety each year”.
 - The College notes that advice to ministers and advice to the Office of Road Safety are related, but different. It is also not apparent whether or not the twice yearly engagements from ITSOC to industry have occurred. The College is the peak membership association for road safety in the region and should therefore be involved in such engagements.
- *Recommendation 4 - The committee recommends that the Australian Government investigate options to encourage fitment of event data recorders across the Australian vehicle fleet, and to enable access to the data by police.*
 - A search of the Federal Register of Legislation reveals no apparent changes to the Australian Design Rules on the topic of event data recorders; and similarly, a search of completed consultations from the DITRDCA consultations webpage reveals no open or completed consultations on the topic of event data recorders.
- *Recommendation 7 – The committee recommends that the Australian Government work with state and territory governments and research institutions to develop and implement a national road safety research strategy.*
 - The College notes that this is an action on the 2023-25 Action Plan, to be completed by late 2024. As of now, we are not aware of any such national road safety research strategy having been completed and implemented, and without the 2024 national progress report, have no information about any progress on this action.

- Recommendation 15 – *The committee recommends that the Australian Government investigate the feasibility of developing a tool to allow road users to plan journeys according to safety, using star ratings as a basis.*
 - The College notes that the government response was non-committal and is not aware of any work under the NRSS 2021-2030 progressing this recommendation.
- Recommendation 18 – *The committee recommends that the Australian Government develop, publish, and implement a roadmap for mandating proven vehicle safety features by regulation.*
 - The College notes that several ADRs are included in the Action Plan. However, few of these have been implemented, and many have not even progressed to a consultation draft. Again, in the absence of a 2024 national progress report, there is little information available to the public about the progress on these actions.
- Recommendation 22 – *The committee recommends that the Australian Government work with state and territory governments to: identify and remove tax-based barriers to the purchase of newer, safer vehicles; and investigate opportunities to provide incentives for the purchase of newer, safer vehicles, with a focus on supporting lower-income road users and people in regional, rural and remote areas.*
 - The College notes that the most significant tax incentives related to vehicle purchases in Australia are encouraging larger, less safe vehicles on our roads. The loophole whereby large, imported utes are considered to be a commercial vehicle and therefore exempt from the luxury car tax, combined with the instant asset write-off for businesses and fringe benefits tax advantages have contributed to a proliferation of oversized, American-style utes and SUVs entering the Australian market, with almost 80% of new vehicles being sold today in Australia being an SUV, ute, van or light truck.(9)
 - The largest of these vehicles have known safety issues, placing pedestrians, cyclists and smaller vehicles at increased risk.(10) The tax advantages are being realised by business owners and those who can afford these expensive vehicles, which is the opposite of the intention of the recommendation to support lower-income road users.
- Recommendation 37 – *The committee recommends that the Australian Government work with state and territory governments and research organisations to develop and implement a national framework for evaluating the effectiveness of road safety campaigns.*
 - The College notes that the government response indicated this would form part of the development of a National Research Framework for road safety, and the review of road safety research being undertaken or commissioned by Australian, state and territory governments, both under the Action Plan. Without a 2024 National Road Safety Progress Report, there is little available public information on any progress on these actions.

From the 2018 Inquiry into the National Road Safety Strategy:

Similarly, there are several recommendations from this inquiry report which remain unimplemented. For example:

- Recommendation 3 – Commit to a minimum \$3 billion a year road safety fund
 - Funding to build roads is not road safety funding. As far as the ACRS is aware, the only time there has been a commitment of \$3 billion in a year for road safety was as a one-off stimulus measure as a COVID response. Governments at all levels and non-government organisations, need funding certainty in order to enable consistent long-term planning and implementation of evidence-based road safety measures.

- Recommendation 7 – Implement rapid deployment and accelerated uptake of proven vehicle safety technologies and innovation
 - There are several actions in the current plan relating to this, and without a 2024 annual report it is unknown what progress has been made.
 - The Australian Government retains vehicle importation standards that are so minimal that zero star ANCAP rated vehicles can be sold in Australia(11).
- Recommendation 8 – accelerate the adoption of speed management initiatives that support harm elimination
 - The action in the current action plan to review open road default speed limits has been on the ‘to do’ list since 2018. It was finally ticked off in the last couple of months of this action plan, in a hasty and poorly implemented manner. The ACRS does not see this aligning the recommendation to with ‘accelerate’.
- Recommendation 11 – resource key road safety enablers and road safety innovation initiatives
 - This recommendation resulted in the establishment of the Road Safety Awareness and Enablers Fund in 2019, but funding for these key enabler and innovation initiatives has been intermittent, with current projects nearing completion (January 2026) and no confirmed future rounds. The lack of continuity between funding rounds has created gaps in program delivery, risking loss of momentum in national capacity-building and innovation efforts.

f) What new or innovative road safety actions are needed across Australia to reduce road trauma

The needed actions have been discussed for years but not implemented, and include:

- Federal and State/Territory Ministers for Road Safety
- Legislated targets for road trauma reduction with Parliamentary oversight and accountability
- Creation of a National Road Crash Investigation Agency – an equivalent of the Australian Transport Safety Bureau to conduct regular, systematic, no-blame investigations into road trauma
- A Joint Standing Committee on Road Safety in the Federal Parliament

g) International approaches to road safety Australia should consider

The latest available international comparisons on road trauma make it clear that Australia is falling behind in relation to many comparable countries in the OECD that have better road trauma rates than ours.(12) We should be looking to each of them, and well as looking at which countries are improving the most in recent years, and see what can be learned from their examples. This may require strong leadership.

h) Specific road user groups, regions, emerging issues or challenges that require more attention

There are many new and emerging issues in road safety that warrant more attention. For example, e-mobility is a very fast moving area with regulation failing to keep up with changes and new technologies; increasing vehicle size and weight being incentivised by tax breaks and increasing risk to those outside vehicles and in smaller vehicles(10); the impacts of the gig economy; equity in road safety; health, environmental, liveability, sustainability etc co-benefits of improving road safety.

Conclusion and Recommendations

The ACRS supports the mid-term review of the NRSS. It is important that we monitor and review national strategies, understand where they are succeeding and where they are failing, and respond to those understandings. As we are ending our fifth year of consecutive increases in road trauma numbers and rates, it is clear that the current NRSS is failing, as the previous ones did.

To improve accountability and transparency in road safety, and more clearly focus government and political attention on this crisis, ACRS recommends:

- Federal and State/Territory Ministers for Road Safety
- Legislated targets for road trauma reduction with Parliamentary oversight and accountability
- Creation of a National Road Crash Investigation Agency – an equivalent of the Australian Transport Safety Bureau to conduct regular, systematic, no-blame investigations into road trauma.
- A Joint Standing Committee on Road Safety in the Federal Parliament.

ACRS appreciates the opportunity to contribute to the mid-term review of the NRSS, and to contribute to improving road safety in Australia.

Please let me know if you need any further details.



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