



27.06.24

**Hon Simeon Brown,  
Minister for Transport,  
Wellington,  
New Zealand**

***An Open letter to the New Zealand Minister for Transport***

**THE LOOMING CRISIS IN ROAD SAFETY FOR NEW ZEALANDERS.**

Dear Minister,

We write to express great concern at the major threats to the lives of New Zealanders being pursued under the guise of improved government and transport efficiency. We both have a long involvement in New Zealand road safety, are alarmed by recent and proposed developments and see the need for some facts to be put before the public.

The Government and Minister have ultimate responsibility to reduce death and serious injury on New Zealand's roads. Successive NZ governments have put in place measures to improve road safety performance over many years now. Eric Howard provided some advice to NZTA in the period from 2010 to 2018. Then Transport Minister Stephen Joyce supported critical road safety reforms including the increase in the licensing age to 16, reducing the legal BAC limit from 0.08% to 0.05% and launching the Safer Journeys strategy and action plans based on the safe system cornerstone, from 2010. These have reduced deaths and serious injury.

It is evident in the most recently available data that positive change is being achieved through the work of the national and local road safety agencies. Results in 2023 were encouraging with NZ reducing the fatalities per population rate to 6.5 per 100,000 population and for example, closing the gap on Victoria, Australia, from twice its rate a few years ago to 1.5 times in 2023. Further reductions in 2024 to date are most welcome, but the rate of death in New Zealand remains unacceptably high among developed countries (some 33<sup>rd</sup> of 38 OECD countries).

However, the Government currently appears to be taking extreme positions on road safety management, speed limits and a singular focus for infrastructure safety investment action. These are certain to have major negative impacts upon road safety outcomes in NZ, with little positive impact on productivity.

The greatest concern is the proposed dismantling of the structured approach necessary to advance government road safety policy development, coordination and delivery, including:

- the abolition of any documented strategy or detailed action plan and of targets to reduce deaths and serious injuries (DSI) across NZ to 2030 and beyond
- recent proposals to gut core road safety expertise at NZTA. If followed through it will likely take half a generation to reestablish expertise. This expertise and advice is an important system protection for Ministers and New Zealanders.

When governments abandon targets altogether (in this case the 2030 New Zealand road safety target) they avoid the challenge of leadership required to force their attention to the job at hand.

Targets are imperative to getting things done. Every successful business sets targets, but the government has recently abandoned this approach for road safety, which has proven successful in countries around the world. This does not meet good governance standards. It does not set ambition for achievement and it does not provide for accountability.

A second major concern is the proposed increase in those speed limits which have been reduced in the past 4 to 5 years right across NZ, (for which a new draft speed limit rule was released for consultation on 13<sup>th</sup> June). This step will increase future deaths and serious injuries.

The proposed blanket reversal of the 30 km/h urban speed limit across New Zealand is likely the first time in the world this has occurred. A recent Ministerial commitment to only reversing speed limits 'where it is safe to do so' is not reflected in the draft Rule. Surely, consideration has to be given to death and serious injury impacts of any reversal? Lower urban speeds are also necessary in many cases to protect pedestrians and cyclists. Lower limits in other countries have not only reduced severe injuries, they have been highly popular with local communities for their wider benefits, including creation of more liveable environments.

Recent independent evaluation of the safety impacts of posted speed limit reductions from 100km/h to 80km/h on a number of state highway corridors, identified substantial reductions of deaths and serious injuries. Very small increases in journey time per vehicle (of a few seconds per kilometre) were measured for those corridors, resulting in crash costs savings far outweighing the travel time disbenefits, resulting in positive economic benefit cost ratios. There were likely other savings not accounted for, including in fuel costs for the transport sector and private vehicles. The argument that reduced speed limits on inadequately safe roads increases costs is incorrect. It actually decreases costs, as well as reducing death and serious injury. Quantified numbers of people are alive and uninjured today as a result of the reduced speed limits on those roads. This encouraging result is highly consistent with the experience from countries around the world.

The focus on investment in upgrading the levels of infrastructure safety on major highways (Roads of National Significance or RoNS) to support safe higher operating speeds is supported in principle. But what about the other 90% or more of the network from which investment will be diverted? Given this reality, lower safe limits than the current 100 km/h are necessary for much of the balance of the regional network. This would deliver major DSI reductions and economic benefits.

The push to reverse speed limit reductions is contrary to the available evidence. This backtracking action you have flagged will increase deaths and serious injuries, and deny New Zealanders increased safety on their roads, while delivering economic disbenefits. Speed limits which respond to the inherent safety of infrastructure in place on a road or street are an essential component of a 'forgiving road system'.

New Zealand transport agencies have worked in close consultation with local communities over a long period of time to improve safety levels on their roads, including with lower speed limits. However, these communities now find they will have little say in a reversal of these changes which will adversely impact the wellbeing of their citizens and the amenity of their towns and suburbs. Lack of consultation with local communities shows not only a lack of respect for local voices, but has also proven very unpopular and unsuccessful internationally.

Every opportunity to reduce death and serious injury based on evidence should be seized by government, particularly where it will bring net economic benefit at low outlay cost. Communities are entitled to expect travel speeds which deliver acceptably safe travel, to be achieved by

appropriate speed limits which accurately reflect the inherent safety of the infrastructure features, vehicle volumes and mix (and pedestrian and cyclist activity in urban areas).

The greater emphasis by the NZ government on police enforcement is a welcome initiative to tackle reckless driving, but it is simplistic to think that it will be enough to comprehensively offset the broader system wide safety gaps that exist, let alone substantially reduce deaths and serious injuries overall in the medium term. The majority of fatal and serious injury road crashes do not involve illegal behaviours, but are the result of unsafe system features.

Governments are often under the misperception that providing safer speeds will be unpopular with the public. This is often based on feedback from a vocal minority. However, when we conduct surveys with local communities and those who use their roads, we typically find strong support for this change.

A tragedy is in prospect from the foreshadowed Government actions, with an abandonment of any strategy, no targets being proposed, staffing capability in government potentially being degraded, road safety coordination likely to be compromised, funding to be diverted away from efficient safety retrofitting of roads, and crucial successful lifesaving speed reforms to be reversed.

A deterioration in NZ's improving road safety performance is inevitable if these changes, now in prospect, are fully implemented. The changes are actually predicted to increase economic costs through higher trauma burden and other disbenefits. The burning question is WHY?

These are unnecessary actions you are looking to introduce Minister. It is occasionally encountered in third world countries where Ministers may not be advised about the evidence, but it is rare in a first world country where an evidence-based commitment to identifying and implementing trauma reduction measures could usually be expected.

You have a heavy responsibility to reduce death and serious injury on New Zealand's roads. The road safety world will be watching the impact of your time as Minister for Transport, and in the years beyond, on road safety outcomes.

Sincerely,



**Eric Howard AM**



**Dr. Blair Turner**

**June 27 2024**

**Eric Howard**

Eric Howard AM is a road safety expert based in Melbourne, and provided occasional advice to NZTA in the years from 2010 to 2018. The governments of the day were engaged with their staff and actively looking for ways to reduce death and serious injuries. In the 7 years prior to 2006, he was GM Road Safety for Victoria, advising the Victorian government on their road safety approach and managing with other agencies what is in any country a tough task, all in a long haul effort to reduce deaths and serious injuries. Every lever available needs to be drawn upon to deliver improved performance. Since then he has operated his own consultancy, working with many governments internationally in many countries and in Australia and New Zealand to support improved road safety performance, (to reduce deaths and serious injuries) particularly on how governments can organise themselves and their agencies to be more effective. Eric was made a Member of the Order of Australia in 2018 for his services to road transport safety consultancy and the community.

**Blair Turner**

Dr Blair Turner is a road safety expert, with almost 30 years experience both in New Zealand and internationally. He started his career with the Land Transport Safety Authority in New Zealand, and since then has held senior roles within the UK government; as Chief Scientist (Road Safety) with the Australian Road Research Board; and as road safety expert at the World Bank, in Washington DC. He is now based in Australia, and continues advising Australian and New Zealand road agencies on road safety. He has provided advice to governments in more than 45 countries on road safety issues, including on road safety management and capacity, and is the author of several global guides on road safety, including one published recently by the World Bank on speed management.