

## 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.

To:

**Joint Select Committee on Road Safety**

PO Box 6021, Parliament House

Canberra ACT 2600

e: [Road.Safety.reps@aph.gov.au](mailto:Road.Safety.reps@aph.gov.au)

p: 02 6277 4707

For further information please contact:

**Mr Martin Small:** President, Australasian College of Road Safety

**Dr Ingrid Johnston:** Chief Executive Officer, Australasian College of Road Safety

Australasian College of Road Safety

PO Box 198 Mawson ACT 2607

e: [ceo@acrs.org.au](mailto:ceo@acrs.org.au)

p: (02) 6290 2509

w: [www.acrs.org.au](http://www.acrs.org.au)

**24 August 2021**

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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 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 this inquiry into road safety in Australia. We note that this Select Committee is essentially a continuation of the previous Joint Select Committee which conducted an inquiry in 2020. We fully support the important step towards, and an indication of commitment to, a Joint Standing Committee being established in the new Parliament, in line with the recommendation of the 2020 Inquiry.(1) The Joint Standing Committee will be a key element of improving governance, accountability and oversight of the next National Road Safety Strategy (NRSS) 2021-2030 to ensure its goals and targets to reduce road trauma are met. The College strongly endorses the establishment of a Joint Standing Committee focusing on road safety and would be delighted to discuss its terms of reference.

## ACRS response to the Terms of Reference

### **a) Measures to support the Australian Parliament's ongoing resolve to eliminate road crash fatal and serious injuries with a focus on ways to achieving Vision Zero by 2050**

The question of how to support eliminating road crash fatal and serious injuries is not a new one. It is worth then, considering recommendations which have been made previously in this regard.

It is important to ensure that the focus of efforts to eliminate fatal and serious injuries is proportionate with the factors contributing to those injuries. Too often, the focus is on attempting to control the behaviour of individuals engaging in high-risk behaviours such as speeding, drink-driving and drug-driving. However, a recent analysis from the Transport Accident Commission found that 70% of road deaths since 2017 involved basic errors rather than high-risk behaviours.(2) While high-risk behaviours must not be ignored, it is important to consider the role played by simple human errors such as misjudging the speed of a closing vehicle, taking a corner too wide, and lapses in concentration, and the failure of the system (ie the roads and vehicles) to be forgiving. As noted in the World Bank Good Practice Note on Road Safety – people should not die because of a mistake.(3)

The recommendations of the Academic Expert Group to the 3<sup>rd</sup> Global Ministerial Conference on Road Safety in Stockholm, Sweden in 2020 summarise the efforts required to address the complexities of road safety globally:(4)

- Sustainable practices and reporting: including road safety interventions across sectors as part of SDG contributions

- Safe vehicles across the globe: adopting a minimum set of safety standards for motor vehicles
- Procurement: utilising the buying power of public and private organisations across their value chains
- Zero speeding: protecting road users from crash forces beyond the limits of human injury tolerance
- Modal shift: moving from personal motor vehicles towards safer and more active forms of mobility
- 30km/hr: mandating a 30km/hr speed limit in urban areas to prevent serious injuries and deaths to vulnerable road users when human errors occur
- Child and youth health: encouraging active mobility by building safer roads and walkways
- Technology: bringing the benefits of safer vehicles and infrastructure to low- and middle-income countries
- Infrastructure: realising the value of the Safe System design as quickly as possible

Bringing this into the Australian context, the ACRS has made the following recommendations:(5)

- 2030 targets to reduce fatal and serious injuries by 50% (both raw numbers and as a population rate) backed by related performance and delivery targets
- Publication in easily consumable form, for the public, of infrastructure star ratings for all road users
- Safety investment plans and budgets to achieve targeted improvements in safety star ratings
- National Regulatory Impact Statement for lowering the speed limits for urban roads and for rural roads
- Keep pace with European vehicle safety regulation that encourages evidence-based driver assistive technologies, especially intelligent speed assist and autonomous emergency braking for all vehicles

These issues have been supported in recommendations from other inquiries recently.

### *Infrastructure Star Ratings*

Calls for the Infrastructure Star Ratings of Australia's roads to be the subject of regular, public reporting, have been made over many years since the introduction of the ratings in 2006. The Australian Automobile Association and AusRAP have published some early reports on this,(6-8) but there has not been any regular public reporting before or since. Some Federal Government funding for roads has been occasionally linked to improving the star ratings of roads, but not consistently. Safety star ratings provide an important opportunity to engage with the community on road safety issues. They are easily understood, easy to explain, and can be used to guide policy and decisions about infrastructure investments. Open data should be embraced to facilitate research and raise awareness. The community want to know about the safety of our roads, and to know that their taxes are making real improvements to the safety of those roads.

The publication of the AusRAP ratings has been recommended by multiple Parliamentary Inquiries. A key finding from the Victorian Parliamentary Inquiry into the Increase in Victoria's Road Toll this year, was that there is no legislative obligation for roads to be built or maintained to a certain standard to increase safety for road users. The report recommended "That the Victorian Government publish an annual report on the road standards that state the star ratings for highways, arterial roads and other roads of significance, such as urban roads with high pedestrian and cyclist activity, in Victoria".(9)

This follows from the publication of infrastructure star ratings being one of several related recommendations of the 2020 Federal Joint Select Committee "the Australian Government work with the states and territories to develop a plan and timeline for the harmonisation of data, including definitions, relating to casualty crashes, road safety ratings, and speeding across the network. Such data should be published regularly".(1)

The EuroRAP (European Road Assessment Programme) publishes their ratings, and transparently uses the information to underpin road infrastructure investment. For Britain they recently reported that the 10 most significantly improved routes from 2014-16 to 2017-19 reduced risk, fatal and serious crashes by a factor of 3, saving more than GBP110,000 per km of improved road.(10)

### *Road Safety Investment Plans and Budgets*

The publication of AusRAP ratings would significantly increase accountability and transparency of road safety investment and budgets in Australia. From an accountability perspective, the previous National Road Safety Strategy (NRSS) Action Plan included a reference to 3-star AusRAP ratings or better for 80% of travel on state roads and 90% of travel on national highways, and infrastructure planning and investment is a priority area nominated in the draft of the next NRSS 2021-2030. Safety star ratings are part of the 12 voluntary road targets set by the United Nations,(11) and provides governments with simple accountability and performance management tools to support safer road investment plans into the future.

In the absence of voluntary publication of these vital data, Federal funding of road infrastructure could be made dependent upon AusRAP publication, to improve governance, accountability and transparency. Real lives and injuries can be saved.

A key recommendation from the Victorian Parliamentary Inquiry into the Increase in Victoria's Road Toll (2021) was that the Victorian Government report on the predicted road standard rating for all road projects, including the expected lifespan and projections. Projections should take into account population growth and ensure roads meet the needs of all road users.(9)

The 2020 Joint Select Committee included recommendations relating to investment plans and budgets:(1)

- that the Australian Government work with state, territory and local governments to collect accurate data on the current condition and rate of change of Australian roads
- that the Australian Government identify priority roads for dedicated and targeted road funding partnerships with the relevant jurisdictions to improve the star rating performance of road infrastructure for all road users.
- that the Australian Government support and fund research into the effectiveness of varying road treatments in a wide range of circumstances, with a view to improving the road safety outcomes of infrastructure investment

The need for focussed infrastructure investment planning was recognised as one of the key areas for improvement from the previous NRSS. The inquiry into the NRSS 2011-2020 also recommended investment in road safety focused infrastructure, safe system and mobility partnerships with state, territory and local governments, that accelerate the elimination of high-risk roads.(12) This inquiry report went on to recommend a minimum \$3 billion a year road safety fund. In response, the Transport and Infrastructure Council committed the Government to investing “an average of \$3 billion per year to road infrastructure that will have a safety benefit. Commonwealth will continue to work with other jurisdictions to identify priorities for investment and ensure that investment has regard to the safe system principles in accordance with the recently signed National Partnership Agreement”.(13) Support for a national road safety fund was one of the key recommendations of the recent NSW StaySafe Committee inquiry into reducing trauma on NSW local roads.(14)

The Black Spot Program, which has played a key role in Federal road safety infrastructure spending over a number of years must be reviewed to ensure it is enabling strategic and planned safety upgrades where they are most needed. The 2020 Joint Select Committee recommended:(1)

- that the Australian Government review its Black Spot Program funding conditions and site eligibility, with a view to making it more effective in proactively detecting and treating deficiencies in road infrastructure
- that the Australian Government increase funding to the Black Spot Program and increase the percentage allocated to regional and remote areas

The role of state and territory governments and local councils in road infrastructure has been the subject of several recommendations. The 2020 Joint Select Committee recommended that the Commonwealth works with states and territories to ensure that funding avenues are identified that specifically support local councils to attract and retain the relevant skills and expertise required for development of all aspects of road safety policy, infrastructure and maintenance.(1) The NSW report from this year noted that local councils often have insufficient funding to adequately address local road infrastructure needs.(14) They recommended that the NSW Government should consider whether local government should have a legislated role and responsibility for road safety.

Infrastructure development or redevelopment needs to be funded to enable autonomous vehicles (AVs). Regulations controlled by the Australian Government need to be redeveloped with AVs in mind ahead of the technology being available in the marketplace, and state and territory jurisdictions need to have a harmonised approach to laws that impact upon AVs.

Funding rounds also need to recognise that short time frames come at the detriment of proper planning and procurement required for infrastructure. ACRS suggested that funding for 3-5 years is more appropriate.

### *Vehicle Safety Regulation*

The 2020 Joint Select Committee recommendations included “that the Australian Government review current timeframes for the mandatory introduction of safety features likely to have the greatest impact on reducing road trauma in Australia”; and “that Office of Road Safety liaise with the Transport and Infrastructure Council with a view to conducting further research into the potential benefits to be gained from various emerging driver assistance technologies”.(1)

The report of the Inquiry into the NRSS 2011-2020 included a recommendation to implement rapid deployment and accelerated uptake of proven vehicle safety technologies and innovation.(12) In responding to this recommendation, the Transport and Infrastructure Council meeting on 22 November 2019, committed to investigating options to streamline regulatory processes, to be embedded in the next NRSS.(13)

Another important inhibitor to the uptake of safer vehicles in Australia is cost. This was directly addressed in a recent recommendation from the Victorian Parliamentary Inquiry into the Increase in Victoria’s Road Toll which recommended the Federal Government’s Luxury Car Tax be abolished.(9) The report notes that the tax was introduced to protect the domestic car manufacturing industry which no longer exists.

There is great enthusiasm to remove the errant driver from the task and move to autonomous vehicles. Each State with some Federal support has suddenly had a surge of interest in spending to test autonomous

vehicles. However, adoption of the technology will take time, with a lengthy transition period. In the meantime, there are real benefits to be gained in terms of road safety, from the evidence-based technologies already available. The Insurance Institute for Highway Safety in the US compares rates of police-reported and insurance claims for vehicles with and without adaptive cruise control, lane-departure warning and head on collision avoidance systems and found road deaths could be reduced by up to one-third if these were available on every car.(15)

While the current vehicle safety regulatory process is linked to United Nations harmonisation of regulations, this results in Australian standards being less than world's best and hence safest practice. A situation where something can meet Australian standards and not actually be safe design is unacceptable. ANCAP has shown how manufacturers and importers can provide best safety practice for light vehicles in Australia ahead of the complex and slow regulatory practices. ANCAP must continue to be supported and resourced. It may require additional resourcing to ensure it is able to evaluate the new technologies, not only for cars but other vehicles. The Australian Design Rules and safe product importation laws could be amended in a more timely manner and be a more effective mechanism to establish a safe fleet of vehicles and other mode of transport, such as personal mobility devices. The current practices must be urgently disrupted to encourage the safest vehicles (cars, trucks, motorcycles) into the Australian vehicle fleet. Regulation to mandate well proven technologies (such as autonomous emergency braking AEB) can currently take almost a decade.

### *Culture of speeding*

In the absence of significant infrastructure upgrades throughout the country, lowering the speed limits to match the safety ratings of the roads is required. Better speed management, including lowering speeds, and implementing uniform speeds to reduce speed differential on open roads.

Grass roots community engagement and support is required for cultural change and a new 'normal'. Road safety has a good history with achieving this, for example with seatbelts. We need to now recognise and understand the culture of speeding in Australia, and work towards change.

Community and school-based education and awareness may be useful in this regard, with greater incorporation into the school curriculum. For example, kinetic energy could be taught with travel speed and road users as the basis for the lesson. This may help to bring about generational cultural change.

### **b) The effectiveness of existing road safety programs across Australia; opportunities to improve them and encourage broader take-up of effective approaches**

Recommendations from the recent inquiries in both Victoria and NSW are relevant to road safety programs, particularly in relation to the road safety expertise and capacities of jurisdictional and local governments. The Victorian inquiry recommended that the Victorian Government review the skill base of managers in the Department of Transport. Required skills include but are not limited to: engineering and infrastructure; road safety policy; and vehicle safety technology.(9) The NSW inquiry recommendations focused on local government:(14)

- consider funding specific road safety officer roles for local government joint organisations under the Local Government Road Safety Program, in addition to the funding available to each council for a road safety officer.
- review the induction, training and ongoing support opportunities provided to road safety officers, and examine ways to improve networking between road safety officers across NSW

Building and resourcing capacity in managing the current pandemic has been essential. In the 18 months since the COVID-19 virus was identified in Australia, thousands of people have been killed and seriously injured from road crashes, and no new national effort has been made to build and resource the capacity needed to manage that road trauma with the urgency necessary.

Greater accountability needs to be adopted by funding organisations to require, fund, monitor and report the achievement and effectiveness of road safety investments and related initiatives. Infrastructure builders and owners should perform critical assessments of major projects' road safety performance, including comparisons to anticipated benefits and taking action to continue to improve performance. Currently, this type of continuous improvement is lacking, with lessons learnt not always being used to inform future projects. Guideline for program evaluation, providing consistent data for comparison, ways of measuring performance and data analysis would enable better comparisons, sharing of results and a common understanding of the road safety performance, particularly using a common evaluation approach based on the safe system.

The Office of Road Safety should conduct research to evaluate existing and recent major programs across jurisdictions to develop a greater evidence base and enable Australian Government funding decisions to be based on independent assessment and evidence. These evaluations must be systems focused, rather than being infrastructure centric, which can lead to overlooking levers such as lowering speed limits. The inclusion of crash records and comparison among similar sites can help support projects which are a priority at an area or network level.

### **c) Opportunities for government policy in health, education, industry, transport and other areas to contribute to road trauma elimination, integrating Safe System principles**

The Safe System principles have been interpreted and implemented in different ways in different places.(16) The Office of Road Safety in Australia outlines our approach, noting the following guiding principles:(17)

- People make mistakes. Humans will continue to make mistakes, and the transport system must accommodate these. The transport system should not result in death or serious injury as a consequence or errors on the roads.
- Human physical frailty. There are known physical limits to the amount of force our bodies can take before we are injured.
- A 'forgiving' road transport system. A Safe System ensures that the forces in collisions do not exceed the limits of human tolerance. Speeds must be managed so that humans are not exposed to impact forces beyond their physical tolerance. System designers and operators need to take into account the limits of the human body in designing and maintaining roads, vehicles and speeds

The ORS outlines a number of key inputs to the Safe System:

- Using data, research and evaluation to understand crashes and risks
- Developing road rules and enforcement strategies to encourage compliance and manage non-compliance with the road rules
- Managing access to the road through licensing drivers and riders and registering vehicles
- Providing education and information
- Being open to and seeking innovation
- Developing standards for safe vehicles, roads and equipment
- Good management and coordination

The implementation of those key inputs requires that government portfolios outside Transport and Infrastructure are involved, placing road safety as a public health issue. For example, an understanding of crashes and risks cannot be complete without detailed data, research, analysis and evaluation including from the health sector. Developing road rules and enforcement strategies to encourage compliance with road rules requires contributions from human behaviour, design, communication and policing sectors. Managing non-compliance with the road rules, means addressing the complexities of contributing factors which may be as wide ranging as education, employment, housing, health and mental health, language, access to services, technological capacity, enforcement techniques and many more.(18) The provision of education and information requires key contribution from the education and communications sectors. Improved telecommunications networks are required for post-crash care, especially in rural and remote areas without access to mobile phone coverage or public telephones. Opportunities for government policy across a range of portfolios to contribute to road trauma elimination not only exist but are essential.

The Office of Road Safety should play a central role in assisting other portfolios to recognise opportunities to improve road safety. Guidelines, checklists and minimum requirements that support and demonstrate the extent to which road safety is incorporated could be developed. This may include increasing active transport for schools, requirements for land developers and precinct designs, regional development and the allocation of funding.

We have no national road safety research strategy in Australia. For example, the mechanisms to encourage the establishment of a safe fleet, increasing four- and five-star vehicles either through primary uptake or retrofitting safety features needs to be better researched, monitored and evaluated. More research is also required on vehicles as a workplace, the related occupational safety and health laws, chains of responsibility and owner onus. A National Road Safety Research Framework was proposed by the National Health and Medical Research Council (NHMRC) and the College in 2013 to Austroads, but the concept has languished. More work on the Framework is needed. We need to link more with the automotive research of manufacturers and suppliers (eg Bosch), the IT and communications sector (eg NICTA) and perhaps build a more specific program as has been done in the Swedish road safety research collaboration. Current road safety research in Australia, while somewhat cooperative, could benefit from a bigger canvas.

The National Transport Commission identified several structural changes affecting transport including changing preferences of personal travel, changing business models, and new technologies.(19) These result in our futures being more unpredictable than ever before, and therefore more difficult to manage. They have been occurring for many years but are poorly addressed by government and often ignored completely. Road safety management needs to develop capabilities to address emerging future issues, such as e-mobility and freight supply chain innovations. New data, analytical techniques and professional capabilities will all need to be developed and applied if we are going to move from a historical perspective to proving what we need in the future. Each of these have implications for road safety and the implementation of the safe systems approach and require contributions outside the transport sector.

The NSW Staysafe Committee recommended this year:

- that Transport for NSW and the Department of Education explore opportunities for road safety officers to support the Road Safety Education Program in the wider community, particularly in rural and regional areas

- that Transport for NSW examine additional ways to support local council staff, particularly engineering staff, to develop their knowledge and expertise about the Safe System approach
- that Transport for NSW develop additional guidelines and resources for local council staff involved in the planning, delivery and maintenance of road assets, particularly for conducting road safety audits

However, within the transport sector, there is still much work to be done. This is highlighted by a key recommendation from the Victorian inquiry which recommended that road safety be a part of all transport projects.(9) Clearly, the profile and prioritisation of road safety even within its ‘home’ sector of transport needs to be dramatically increased if the significant changes require to set to vision zero are to be achieved.

The societal and economic benefits of infrastructure and safety that are not about efficient transport are grossly underestimated, calculated or incorporated into evaluations and funding decisions. Road, road-side and any infrastructure for vulnerable road users should be recognised as more than an economic benefit or burden for transport and the efficiency of transporting people or goods on a ‘time is money’ basis. The benefits of such infrastructure should be considered in relation to community resilience, health, wellbeing and amenity.

#### **d) Opportunities to embed road trauma prevention across Australian Government portfolios and agencies**

Better alignment of national, state/territory and local government policy and road safety strategies would promote and enable a more holistic approach with multi-jurisdictional and multi-agency planning, performance management and reporting. This represents a genuinely national road trauma elimination objective. The National Office for Road Safety, in collaboration with lead agencies from each jurisdiction, should develop and coordinate an integration approach for road safety as a public health issue, including research on best practice in Australia and how to implement it.

Clear identification of road safety as a public health issue may assist in bringing about cultural change within the community and allow contentious issues such as speeding to be addressed.

The Australian Government uses the “Best Practice Guide to using standards and risk assessments in policy and regulation” to assist policy officers in assessing the suitability of standards or risk assessments in policy and programs.(20) Whilst there are several areas that are specific regarding safety, including vehicles, the guide is inadequate to promote road safety and contribute to the reduction of road trauma in Australia.

The NSW StaySafe committee inquiry into reducing trauma on NSW local roads found that better planning and coordination about road safety issues, campaigns, and projects is needed across all levels of government.(14)

A key action for road trauma prevention which is sometimes forgotten, and often neglected, is to enable and encourage alternative forms of transport. Providing appropriate infrastructure for non-vehicle occupants, encouraging public and active transport, and reducing car and truck traffic volumes both requires input from, and has benefits for multiple portfolios.

Designing cities which facilitate local living and walkable communities will help to reduce road congestion and pollution, and increase active transport, with flow on benefits to health and the environment.(21, 22) This may include the introduction of dedicated lanes for motorcyclists, cyclists, personal mobility devices and

pedestrians, as well as ensuring that the services and facilities people need in their daily lives are within their local communities, reducing the need for lengthy daily commutes.

With the disruption caused by the pandemic, there has been and will be a long term shift in the usage of transport. Work from home, retail shopping from home, education and online logistic services have been dramatically changed not just as a result of health advice but the availability of efficient, low cost electronic communications, data and artificial intelligence. This shift in transport has impacted on reductions in road trauma with lower traffic volumes in some central urban areas although there have been increases in road trauma perhaps due to higher traffic speeds in other areas. This disruption will require considerable rethinking of road traffic planning and the subsequent impact on road safety results.

### **e) Opportunities to reduce road trauma in the workplace, working with Work Health and Safety agencies and employers across Australia; including a focus on heavy vehicles and the gig economy**

The issue of workplace safety around vehicles is increasing in profile in Australia and around the work as the gig economy reduces regulation and increases risk. SafeWork Australia have found that 64% of worker traumatic injury fatalities since 2003 involved a vehicle.(23) However, reporting is inconsistent, and significantly underestimates the scale of work-related fatalities in road traffic.(24) There is no doubt that road traffic is the number one setting for work related fatal injuries in Australia.

Changes are required at both system and workplace levels.

In 2012, a report on work-related road safety noted that under Occupational Health and Safety legislation in Australia, vehicles used for work purposes are considered a workplace, therefore employers have an obligation (duty of care) to provide a safe place and safe system or work. Likewise, employees have an obligation to perform work (including driving) safely and comply with legislation, policies and procedures to minimise safety risks.(25) The huge increase in the gig economy since that time has highlighted the weaknesses of the existing system, with the deaths of 5 on demand delivery drivers in a 2-month period during 2020. It will be important to better understand the relative contribution of the gig economy to overall road trauma, analysing the extent and nature of the problem, and identifying the root causes. The gig economy may operate as a loophole for unsafe work practices, which is unacceptable. Any such loopholes in the road safety role and responsibility of work safe agencies must be identified and closed.

Proposals to address the current inadequacy in regulation have included establishing a new Federal standard-setting body for all Australian road transport industry which would provide for minimum rates and safe conditions for all workers, regardless of their formal work status.(26)

The Victorian inquiry this year recommended that the Victorian Government consider expanding WorkSafe Victoria's role in relation to road safety, including:(9)

- Making WorkSafe Victoria a road safety partner
- Amending the Occupational Health and Safety Act 2004 (Vic) (and other relevant legislation and regulations) in relation to WorkSafe's role in workplace road safety
- Increased collaboration between WorkSafe and current road safety partners to better address safety issues and improve outcomes in the context of workplace road safety

Legislation, regulations and government policy needs to either be agile and timely enough to keep up with technology developments, or to focus on the safety requirements and outcomes to be achieved, rather than how they will be achieved from a mechanical perspective. Occupational health and safety training and competency requirements should include road safety, for all transport based and road travel inclusive occupations.

Fleet owners and operators should be required to invest and provide technology and practices to improve road safety. Technology and practices such as drive/vehicle monitoring to detect fatigue, poor driving habits and near miss incidents, should be considered the same as personal protective equipment to be mandatorily supplied by the employer or fleet owner.

The National Freight and Supply Chain Strategy has important connections with workplace health and safety for heavy vehicles.(27) Road safety must be a key element of the implementation and monitoring and evaluation of that strategy.

At a workplace level, the National Road Safety Partnership Program found that effective safety – starts from the top, is an ongoing process, is good business, prioritises employee protection and takes advantage of technology.(28) A 2017 study interviewing managers from small, medium and large organisations found a need to build accountability within organisations, improve communication practices, improve journey management, reduce vehicle-related risk, improve driver competency through effective workplace road safety management program, review organisational incident and infringement management.(29)

Several guides for workplaces have been developed both in Australia and elsewhere globally. The US based National Institute for Occupational Health and Safety lists 10 actions to protect drivers at work:(30)

1. Create a culture of motor vehicle safety
2. Develop policies and procedures
3. Select, train and periodically assess drivers
4. Use in-vehicle monitoring systems (IVMS)
5. Reduce distracted driving
6. Prevent fatigued driving
7. Prevent impaired driving
8. Ensure safe speeds
9. Select and maintain safe vehicles
10. Use data to drive program decisions

The national WHS guide published by all Australian regulators currently aligned with the national model law “Vehicles as a Workplace” notes that the adoption of safe systems principles has brought road safety into closer alignment with traditional work health and safety thinking – fatalities and serious injuries are unacceptable and preventable.(24) The Guide translates a WHS risk analysis for vehicles as a work places and notes:

- The likelihood of exposure to the hazard is extremely high
- The degree of harm that can arise is extremely high
- The hazards and risks commonly experienced in road traffic are well known
- There are numerous, proven controls to minimise risks
- Analyses have shown that the benefits of controls (prevention) can far exceed the costs

Road traffic is the number one setting for fatal injury in Australian workplaces, and seven State and Territory WHS regulators have published the first comprehensive WHS guide to duty holders regarding the prevention of workplace injury in road traffic. The ACRS cannot understand why SafeWork Australia has not provided all WHS duty holders across Australia with comprehensive guidance about this critical WHS issue. What signal does this send about SafeWork Australia's priorities?

## Conclusion and Recommendations

The ACRS supports the inquiry into road safety, and the continuation of the Joint Select Committee as a sign of commitment to a Joint Standing Committee in the next Parliament. In order to achieve the goal of the elimination of fatal and serious injury on our roads, significant changes are needed, and the prioritisation of all governments to the issue is fundamental.

ACRS recommends:

- Publication in easily consumable form, for the public, of infrastructure star ratings for all road users – the community should know about the safety of the roads they travel on, as they do the vehicles they travel in
- Safety investment plans and budgets to achieve targeted improvements in safety star ratings – required for transparency and accountability in monitoring and evaluating progress in achieving our stated goals
- National Regulatory Impact Statement for lowering the speed limits for urban roads and for rural roads – to both match the safety of our infrastructure to the speed limits, and to address the culture of speeding
- Keep pace with European vehicle safety regulation and continue to resource ANCAP to encourage evidence-based driver assistive technologies, especially intelligent speed assist and autonomous emergency braking for all vehicles – to ensure we make the most of the opportunities provided by evidence-based technology developments
- Support and resourcing of research, non-government professional and business organisations to build the capacity needed to embolden all the community to adopt a safe system for our personal mobility.

We are grateful for the opportunity to comment and contribute to improving road safety in Australia. Please let us know if you would like further information.



Dr Ingrid Johnston  
CEO  
Australasian College of Road Safety



Martin Small  
President  
Australasian College of Road Safety

24 August 2021

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