

# ACRS Submission

## DRAFT SOUTH AUSTRALIA'S ROAD SAFETY STRATEGY TO 2031



### ***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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**1 Sept 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.

ACRS welcomes the draft South Australian Road Safety Strategy to 2031 and appreciates the opportunity to comment.

## ACRS response to the Terms of Reference/Consultation Draft

### a) Responses to ACRS November submission

In November 2020 the ACRS South Australian Chapter provided a submission on the paper that accompanied the yourSAy survey.(1) The following key elements were recommended to be strongly stated in the strategy. Shown to the right of these is the status of these recommended key elements that ACRS perceive within the draft strategy.

<b>ACRS recommended key elements in strategy</b>	<b>Status in the draft strategy</b>
<i>The current 2050 vision for the elimination of fatalities on the road extended to serious injuries.</i>	Vision remains only in terms of lives lost / fatalities.
<i>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.</i>	Targets are in per capita terms. Serious injury target is 30% rather than a 50% reduction.
<i>Publication in easily consumable form for the public of infrastructure safety star ratings for all road users.</i>	No commitment to publish is apparent.
<i>Safety investment plans and budgets to achieve targeted improvements in safety star ratings.</i>	Broad principles are outlined, which are welcomed, however any funding indications are absent.
<i>Regulatory Impact Statements for lowering the speed limits for both urban roads and rural roads.</i>	Recognition of reducing urban speed limits as a treatment is welcome, however there is no commitment to any regulatory impact statements.
<i>Proactive involvement with the Federal Government to keep pace with European vehicle safety regulation that encourages evidence-based driver assistive technologies, especially intelligent speed assist and autonomous emergency braking.</i>	ACRS welcomes the strategies within the Vehicles Focus Area to work closely with the Federal Government on greater adoption of driver assistive technologies. New innovative ways to drive greater technology uptake and significantly decrease the average age of the state’s vehicles are lacking.

## **b) Vision, targets and overall approach**

The proposed vision completely ignores the plight of people seriously injured in road traffic crashes by focussing on deaths only. The College strongly recommends that the vision be for zero deaths and zero serious injuries by 2050.

The College notes that the proposed targets are in line with the draft National Road Safety Strategy 2021 – 2030 and is disappointed that the target for serious injuries is limited to a 30% reduction, and then in per-capita terms only. Internationally the interim target for reaching zero serious injuries at 2050 is widely recognised as needing to be a 50% minimum reduction by 2030, in absolute terms.(2, 3) The College strongly recommends a 2030 target of 50% reduction in deaths and serious injuries, with both measures being in simple absolute terms.

The fatality and serious injury trend graphs on page 19 tell a different story to the description provided immediately above them: *The number of lives lost and serious injuries in South Australia is decreasing over time*. This is true over the long term for the whole state, however the short / medium term trends are the opposite and showing increases. Furthermore there is no reference to the previous state road safety strategy Towards Zero Together. The 2020 strategy targets were not met and yet there is no discussion on why this implementation failure occurred and what needs to change. Adding commentary on the graphs' short / medium term trends will far better acknowledge the need to address harm with more funding and resources.

Including the third and fourth graphs (page 20) showing trends for regional and remote deaths and metropolitan serious injuries is useful as they are both of serious concern in the long term and short term. Some commentary on these two latter graphs would be a useful addition to the strategy document.

Overall ACRS considers that there is a distinct lack of linkages between the vision and targets on the one hand, and the Key Strategies within each Key Focus Area on the other hand. It is disappointing that some key performance indicators are not yet developed. Without key performance indicators (both lead and lag) to show progress towards target achievement, it is not clear how the 78 Key Strategies could be prioritised for limited funding. Nor is it clear whether they will be sufficient to meet the vision of the Strategy.

Consistent with best practice, a series of more specific outcome indicators track changes in trauma levels across road user type, crash types, urbanisation, and other categories. While decreases in these measures are the desired outcome, they do not help inform how components of the system are performing, optimised or best coordinated.

Intermediate or safety performance indicators allow assessment of the effectiveness of road safety interventions and understanding of gaps. The aim is to show the level of road safety that exists: the state of the system. This is different and complementary to measuring outcomes, and the level of implementation or interventions (outputs). Safety performance indicators measure the influence of the interventions rather than the quantum of the interventions.

The development and reporting of safety performance indicators can assist in understanding progress against objectives and measuring interventions. This approach is adopted by the best performing road safety countries and is being progressed as part of the National Road Safety Strategy 2021-2030 (4).

Examples of safety performance indicators include:

- Share of travel on high-speed rural roads with nominated infrastructure standards
- Share of sober drivers
- Share of road length of designated motorcycle routes with crash barriers with motorcycle protection
- Average age of the light vehicle fleet
- Share of new light vehicles sold with Lane Keep Assist Systems; Autonomous Emergency Braking Systems; adaptive cruise control; automatic emergency services notification

### **c) Principles to inform decisions making and investment**

The College notes and applauds the inclusion of the following principle:

*When designing, building and upgrading road infrastructure, and planning maintenance, safety requirements and safety outcomes will be given priority.*

For this principle to be effective it is important that it is fully adopted within the Department for Infrastructure and Transport, and particularly by local government councils. Furthermore the College considers that the principle needs to better recognise that road transport operates as a complex system, and as such, the scope should extend to the operation of road infrastructure. This includes the phasing and sequencing design and operation of traffic signals, operation of intelligent transport systems including variable speed limits, as well as changes to static speed limits, parking controls and on-road communication of other road rules more generally.

### **d) Strategic focus areas**

ACRS notes the nine Key Focus Areas of: Road user behaviour; Aboriginal road safety; Vehicles; Older road users; Roads; Walking, cycling and public transport; Regional and remote areas; Younger road users, with a focus on those living in regional or remote areas; and Workplaces. The broad coverage of the Key Focus Areas is commended. While covered in various places, particularly under road user behaviour, speed is such a significant road safety issue that ACRS considers it should be a key focus area in its own right.

#### ***Road User Behaviour***

The draft Strategy states: *Most people who use the roads in our State obey the road rules and use roads safely most of the time.* This statement is disputed as it does NOT follow that people obeying the road rules means they are using the roads safely; if they were there would be far fewer serious crashes. A key point is speed, with the increasing recognition that the 100 km/h default speed limit is too high on undivided and unprotected roads.(5)

#### Social Model Approach

The draft National Road Safety Strategy 2021 – 2030 introduces the Social Model Approach as a new approach for the delivery of that strategy.(4) The Fact Sheet accompanying the draft National Strategy provides a comprehensive overview of the Social Model Approach, describing a multi-layered framework with essential grassroots elements to bring about sustainable cultural change. While in the end aiming to change individual attitudes and behaviours, the Social Model Approach is much wider in scope than outlined in the draft South Australia Road Safety Strategy. ACRS suggests the description of the Social Model Approach be separated and elevated from within the Road User Behaviour area, and that the Australian ORS Fact Sheet be referenced.

ACRS sees much potential in the full application of the Social Model Approach to bring about cultural change. Crucial to success will be the avoidance of victim blaming; indeed this is considered a key part of the cultural change needed to achieve the Strategy's targets.

The draft Strategy states that: *we need to progress a whole-of-community road safety agenda that assists people to do the right thing.* ACRS agrees that a whole-of-community agenda is needed - that agenda which will be crucial and the Social Model Approach would appear to be a principle way forward. The agenda needs to be more ambitious than assisting people to do the right thing; rather it should be aiming for significant cultural change so more difficult treatments are accepted within the community.

### Mass Media Campaigns

Mass media campaigns are one of many elements in just one layer of the Social Model Approach, so should remain under the Road User Behaviour heading, separated from the description of the Social Model Approach. ACRS considers that implementing mass media campaigns in and of itself would not be an adoption of the Social Model Approach.

### **Vehicles**

ACRS is encouraged by the continued engagement with the Australian Government and ANCAP in advancing vehicle safety work nationally to influence the Australian Design Rules and ANCAP Star ratings. The Strategy however makes no mention of moving vehicle standards to align with those in Europe. While this is implied as it is a national position, the Strategy should make this direction clear, highlighting the move as a way to encourage safer vehicles and driver assistance technologies.

Nevertheless, ACRS considers the Vehicles Key Focus Area lacks any real cut-through initiatives which aim to encourage the removal of older vehicles from the road network. Given the age of the South Australian vehicle fleet, further strategies are needed to significantly increase to portion of the State's fleet with a 5 Star ANCAP rating and increase the prevalence of driver assist technologies such as automatic emergency braking, lane keeping assistance, adaptive cruise control and blind spot warning. This is particularly critical in regional and remote areas where vehicles are older and serious casualty crash rates higher.

The focus area lacks any specific Key Strategies aimed at reducing the average age of, and improving safety technology take-up in, the heavy vehicle fleet.

### **Roads**

The College agrees that there is a need for the transformation of the road system. The statement for the Roads Strategic Focus Area focuses on future transport needs, future vehicles, and the long term. The College argues that the transformation should focus on road safety through the application of the safe system principles and be across the short / medium term as much as possible. This approach would focus on the 2030 targets in addition to 2050. Future transport needs and the requirements of future vehicles such as vehicle automation would be significant considerations for safe travel.

*Operation* of road infrastructure should be added to the Roads strategic focus area, along with *design, construction and maintenance*.

### Urban areas including walking, cycling and public transport

The College commends the inclusion of lower speed limits and the application of the Movement and Place concepts as treatments in urban areas. Using the Movement and Place Framework could dovetail well with the Social Model Approach given both involve significant collaboration to successfully implement sustainable changes.

In the College's view, a major activity to significantly reduce deaths and serious injuries in urban areas, particularly for vulnerable road users, is to undertake a Regulatory Impact Statement on reducing the 50 km/h urban default speed limit.

### Regional and remote areas

The College considers the strategy weak in addressing the safety of regional road infrastructure. All regional treatments are locally based. There is no system-wide treatment, such as reducing speed limits where the local treatments are not implemented. In the Fact Sheet on Movement and Place and Speed Management that accompanied the draft National Road Safety Strategy 2021-2030,(4) it clearly states: *There are roads in Australia which are subject to the default speed limit (i.e. 100 km/h) that are not safe for a speed limit that high. For example, a number of roads in regional and remote areas are undivided, single carriageways where the default speed limit typically applies and these roads have been found to consistently have a much higher proportion of crash deaths than other roads.* The fact sheet also usefully states: *To succeed in reducing speed limits, greater understanding of risks associated with speeding is needed, creating community acceptance leading to a social license to support speed limit reductions as a credible road safety solution.* This transformation should be a major application of the full use of the Social Model Approach.

In the College's view, a major activity to progress system-wide change is to undertake a Regulatory Impact Statement on reducing the 100 km/h rural default speed limit.

The College considers that the targets for harm reduction are simply not attainable in regional areas without a system-wide intervention.

By significantly reducing the default rural speed limit, proposed road infrastructure improvements that allow a safe increase in the speed limit can be justified on the basis of travel time benefits.

### Star ratings for road infrastructure

The College notes Key Strategy 53: *Improve the star rating of our road network, with a particular focus on high speed, high volume roads*, and is encouraged by the use of star ratings. The College has a national level position that star ratings of roads should be made public as important road user consumer information, and requests that star ratings measured periodically by South Australian road authorities are indeed made public in a proactive manner, and not held as data for only internal use. Furthermore, it is considered the measurement and public reporting of star ratings should extend much more widely than the high speed high volume portion of the road system.

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".(6)

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".(7)

### **Workplaces**

The opening statement highlights a tragic fact; that more workers lose their lives as a result of vehicle-related incidents than any other cause of work-related death. What is not stated, but is an obvious implication, is that this situation is due to the road system being inherently dangerous; a situation that should not be tolerable. On regional and remote roads, the lack of any system-wide road network treatment is not tenable under modern work health and safety principles and law.

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.(8) 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.

The Victorian Inquiry this year recommended that the Victorian Government consider expanding WorkSafe Victoria's role in relation to road safety, including:(6)

- 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

These recommendations are also relevant for South Australia.

There is a significant gap in the Workplaces Key Focus Area where there is no linkage to SafeWork SA, which has responsibility for, inter alia, enforcement of work health and safety laws in South Australia. SafeWork SA has a crucial role in communicating with, advising, and regulating work health and safety duty holders - roles critical to the elimination of vehicle workplace deaths and serious injuries. ACRS considers that this inter-relationship should be a feature of the Workplaces Key Focus Area.

## **e) Effective implementation**

### **Action Plan**

The concept of a three year Action Plan that is updated annually is welcomed by the ACRS. It is strongly advocated that the Action Plan contains clear funding commitments, with clear linkages among the Strategy's Targets, Key Focus Areas and the status of key performance indicators during the life of the Strategy. Furthermore, it is suggested that the Strategy indicates clearly the intention for such funding with its linkages to be a key part of the Action Plan.

### **Network Safety Plans**

ACRS is encouraged by the intention to develop Network Safety Plans. Including use of such plans by local government is welcome. The description of such plans is in terms of investment with a focus on planning and prioritising. It is recommended that the scope of Network Safety Plans not be limited to improvement projects and be extended to wider treatments, such as speed limit reductions.

### **Leadership**

Increasing local government's involvement in road safety is crucial to the success of the Strategy, as is continuing to improve data and information. Road safety research remains vital and ACRS encourages strong linkages with research institutions. These elements of the Strategy are welcome.

The Strategy is silent on leadership more broadly which implies a status quo of governance arrangements. In our view, there needs to be a much more robust leadership and governance framework for road safety in South Australia. This should consist of three fundamental elements:

- A statutory office, or at a minimum, statutory office holder, with responsibilities including:
  - Road safety strategy, planning and policy development;
  - Monitoring, evaluating and reporting on road safety performance, and commissioning research and development projects;
  - Allocating, or directly recommending allocation to Ministers, a road safety fund which comprises at least the traffic fines paid by motorists; and
  - Promoting and communicating road safety and a systems based response to road traffic injury.
- A properly constituted governing council in legislation which includes the Commissioner of Police and the Chief Executive of the Department for Infrastructure and Transport, acting as the governing council or board of the above office, along with independent members appointed by the Governor.
- A stakeholder forum.

## Conclusion

The ACRS welcomes the draft road safety strategy for South Australia. The previous Towards Zero Together road safety strategy is marked by missing its targets as a result of implementation failures. This is not unique to South Australia and was a major finding of the 2018 Inquiry into the National Road Safety Strategy 2011 – 2020.<sup>(9)</sup> It is an imperative, in terms of unnecessary human suffering, to ensure this implementation failure is not repeated.

ACRS recommends:

- Strong leadership and governance with a statutory office/holder, governing council and stakeholder forum;
- Stronger linkages between the vision, targets, key focus areas, and key strategies with additional key performance indicators;
- The vision include the elimination of serious injuries;
- A Regulatory Impact Statement on reducing speed limits; and
- Publication of infrastructure star ratings

We are grateful for the opportunity to comment and contribute to the SA Road Safety Strategy. Please let us know if you need any further information.



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1 September 2021

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