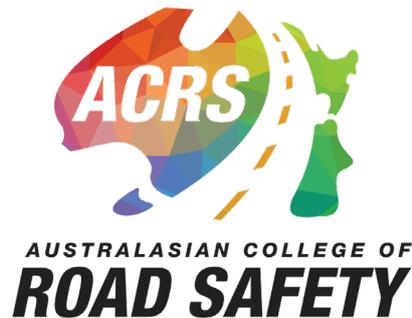


# ACRS Submission



## ***About the Australasian College of Road Safety***

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

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

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**23 September 2022**

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

## ACRS response to the Consultation Draft

### a) Background and context

The RSAC sponsored review seeks to identify potential enhancements to the Tasmanian motorcyclist Graduated Licensing System (GLS) to reduce road trauma among young and novice riders. As an outcome of the review a total of nine changes to the Tasmanian motorcyclist GLS have been recommended with the intent to improve safety outcomes for young and novice riders.

The report presents Matthew Baldock as 'independent'. However, since he led a 2018 review of the South Australian motorcyclist GLS that resulted in amendments being introduced in 2021 and a similar review in Victoria, he should be presented as a Subject Matter Expert (SME).

The evidence presented in the paper *Recommendations for a Graduated Licensing System for motorcyclists in Tasmania* focuses on the "why" we should amend the GLS but does not refer to evidence from previous interventions to confirm the effectiveness of the changes. It is our understanding that no evaluation of the SA and Vic enhanced GLS implementation has been completed and made available to the public. In the absence of this, it may be premature to recommend alignment with these changes.

Further, it should be noted that the changes to the Tasmanian training program have been introduced mid-stream to the data under consideration.

### Motorcycle riding in Tasmania

The decline in learner licence holders since 2017 referred to in the report may be in part because the cost to obtain a licence has grown quite substantially. It now costs \$704.00, which is more than double the previous cost. The learner must continue on with a Check Ride that costs \$253.00 then progress to Pre provisional

assessment at a further cost of \$198.00. A total cost to the candidate of \$1155.00. Inflationary costs associated with motor vehicles should also be considered in an interpretation of learner licence numbers.(1)

### **Motorcycle Crashes Tasmania**

Motor Accident Insurance Board (MAIB) data excludes all claims for unlicensed riders and uninsured motorcycles, which will affect the comparability with other jurisdictions.(2) Within the Tasmanian data, there has been a noteworthy decline in MAIB claims from motorcyclists.

### **Novice and young rider safety**

It is unclear from the review whether consideration has been given to several factors important in interpretation of the data. For example, a learner car driver being supervised, improvements in rider training, differences between qualified and trained riders and those without the benefit of training, and the purpose and timing of trips (shift workers riding at night, gig economy riders etc).

### **Lack of protection relative to other vehicles**

There are ongoing improvements to rider PPE (Personal Protective Equipment) such as motorcycle and rider airbags, materials and the testing of same.

### **Vehicle and road factors**

Licensed motorcyclists are professionally trained to deal with the aspects identified in the report however, the quality and quantity of such training will vary among riders.

### **Motorcyclist visibility**

Novice riders are taught techniques to make themselves more visible. For example, the Roadcraft principles look (to identify danger) and slow down, move away, to build and provide a mobile safety buffer, emphasises behaviour, attitude and mental skills which may compensate for the riders' vulnerabilities.(3)

Visibility is often put forward as a reason for a car to motorcycle crash as the motorcycle presents a smaller profile to that of other vehicles. A comparison with the visibility of motorcyclists to each other may be useful in identifying the potential role of factors such as viewer interest, perceived threat and hierarchy bias.

Even more than the cyclist, the motorcyclist is directly involved with other larger powered vehicles. Harm to any vulnerable road users may be a "canary in the coalmine" to broader transport system safety issues.

### **Graduated Licensing**

We acknowledge and support the overarching principle to ensure that new drivers/riders gain experience under low risk conditions before progressing to an unrestricted licence. It should be noted that it is difficult to quantify what effect "poor" over "good" GLS has or to isolate the effect of individual elements.

### **a) Age of entry**

The training statistics for 2022 show that approximately 85% of novice riders trained so far this year were over the age of 20 years.(4) This suggests that only a small proportion of new riders are in the age group targeted by the suggested changes.

Evidence of the benefit arising from the changes made in Victoria and South Australia would be beneficial in supporting alignment with them. Of interest is that the 9 fatalities that we are aware of for the current year 2022 are of an average age of 35, with only one of this group being within the “novice” age band. This individual had crashed following a police chase.(5) The majority of these fatalities are outside of the novice age that these interventions are intended to address.

Alternative forms of transport including affordable and reliable active and public transport must be available to support the proposed measures and improve safety. Concessions may be required such as time of day restrictions, and in regional areas with limited transport options.

**Not fully supported; concessions will be required**

### **b) Minimum tenure during learner licensing phase**

This recommendation would simplify the tenure arrangement; however, the report should elaborate on how or why it will reduce novice motorcycle crashes. ACRS supports skills refresher courses for those who have let their licence lapse for 5 years or more (any expired licence o/s or otherwise) (ie the ACT has the MASTER program).(6) A Tasmanian process has been developed for the conversion of overseas motorcycle licenses which would also be suitable.

**Agreed**

### **c) Hazard perception test**

ACRS supports a hazard perception test, which should be aligned and integrated with the Learner Course content. However, it may be more beneficial when considered as a training or coaching opportunity rather than simply an assessment. The Pre- Learner and Check Ride are opportunities to assist the student interpret the appreciation of hazards.

**Agree – supported.**

### **d) Carriage of pillion passengers**

ACRS notes that the same risks associated with being pillioned by a learner are multiplied by the unique skillset required for a sidecar.

**Agreed - supported**

### **e) Night-time curfew**

With the current lack of affordable public transport in many areas of Tasmania, particularly out of business hours, exemptions may be required for work related travel. It is noted that there are concessions applied for riders in SA and WA. Data should be provided as to the safety outcomes of these concessions.

The report notes that 43% of the 12-5am crashes involve younger riders. It would be helpful to assess the rider conspicuity, behaviour, fatigue, alcohol and other drug impairment, season and time of day, as well as age in terms of contribution to this over-representation.

#### **Supported with consideration of possible concessions**

##### **f) Towing**

The CASR recommendation notes that there is no evidence that towing as contributory factor in novice motorcycle crashes in Tasmania. The existing training syllabus advises Pre learner, Check Ride and Pre Provisional students that towing is not permitted as part of their novice restrictions, as per the curriculum in other jurisdictions such as the ACT and NSW.

The legislation may require updating to clarify this practice; however, it is unlikely to contribute to the intended review outcome.

#### **Agreed - however this recommendation is unlikely to have any effect on novice crashes**

##### **g) Use of mobile phones or other communication devices**

Novice driver/ rider distractions should be limited wherever possible. Unfortunately, the use of Bluetooth connectivity by motorcyclists would be difficult to enforce especially as many brands of helmet incorporate support for Bluetooth devices. It should be noted that GPS and music may also contribute to distraction. Any concession of this nature is inappropriate outside the training role.

#### **Agreed**

##### **h) Maximum speed restrictions**

It is important to make a significant distinction between motorcycling and operating other road vehicles. A relatively modern car is equipped with a protective passenger cell, seat belts, seat belt pretensioners, airbags and other equipment designed to protect the occupants of a vehicle in the event of a crash. Anti-lock braking systems and traction control systems are already common in vehicles, having been mandated in new vehicles in 2003 and 2013 respectively.(7, 8)

A modern motorcycle may be fitted with anti-lock braking system and traction control systems, but as mandating these safety features is so far behind cars, the vast majority of motorcycles do not have them. Motorcycles that can be utilised by novice riders do not have any feature that can assist in preventing injury if the rider is involved in a crash.

Speed has been identified as an injury risk for motorcyclists in Australia.(9, 10) Research suggests that the human body cannot react well to impact speeds when terminal collision occurs at more than 40 km/h.(11, 12) Novice riders may well have skills to reduce speed from a maximum of 80 km/h down to 40 km/h prior to coming into contact with an object. However, if there is an increase of 10 km/h for learners and 20 km/h for P1 riders then it is likely that they will not have the skills to reduce impact speeds to 40 km/h or less, this will have a consequential effect on serious injuries and fatalities.

Equity between drivers and motorcyclists is problematic since there are significant differences by definition.

The report notes “Nevertheless, the Framework acknowledges that a lack of evidence does not necessarily mean that a countermeasure is ineffective.” (p26) In striving for an evidenced based policy and intervention, obtaining such evidence should be prioritised.

It also should be noted that in the speed comparison table (page 27) for the states and territories, the ACT speed data is omitted. The ACT novice is limited to the posted speed limits of which the maximum is 100kph (there are no 110kph zones). The ACT has the benefit of a well-designed built environment where infrastructure and road conditions are more forgiving to error than that in other jurisdictions such as Tasmania.

**Disagree - The current speed limits adequately address the issues and should not be changed.**

### **i) Learner Approved Motorcycle Scheme**

The Learner Approved Motorcycle Scheme (LAMS) is a valid restriction. There is no clear evidence that restricting P2 licence holders to LAMS motorcycles will play any role in reducing crashes. A correlation was identified between high-powered motorcycles and both crash rates and injury severity, but no over-representation of Tasmanian P2 riders was noted.

**Disagree unless P2 crash data supports.**

## **Conclusion and Recommendations**

The following table details the recommendations and ACRS Tasmania support and notes an expectation of effectiveness, however this is difficult to estimate without data regarding the efficacy of these recommendations in Vic and SA.

Recommendation		Support of intervention	Expectation of effectiveness
(a)	Age of entry	Not fully supported – concessions will be required	Some effect
(b)	Minimum tenure during learner licensing phase	Agreed	Minimal
(c)	Hazard perception test	Agreed – seek alignment with Driver and with Novice syllabus	Useful
(d)	Carriage of pillion passengers	Agreed	Nil effect
(e)	Night-time curfew	Supported with concessions and an understanding why the previous curfew was abandoned.	Some effect.
(f)	Towing	Agreed - however this recommendation is unlikely to	Nil effect

		have any effect on novice crashes	
(g)	Use of mobile phones or other communication devices	Agreed – training concessions only	Some
(h)	Maximum speed restrictions	Disagree -The current speed limits adequately address the issues and should not be changed.	Minimal, reduces benefit to Novice
(i)	Learner Approved Motorcycle Scheme	Disagree unless P2 crash data supports.	Not certain.

ACRS appreciates the opportunity to comment on these proposed changes, to improve motorcycle safety in Tasmania. Please do not hesitate to contact us should you require any further information.



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