

**From:** roadsafetystrategy@infrastructure.gov.au on behalf of Office of Road Safety <roadsafetystrategy@infrastructure.gov.au>  
**Sent:** Tuesday, 23 March 2021 5:51 PM  
**To:** RoadSafetyStrategy  
**Subject:** National Road Safety Strategy 2021-30 - have your say submission - Prof Narelle Haworth [SEC=OFFICIAL]  
**Attachments:** carrsq-nrss-submission.pdf

Submitted on Tue, 2021-03-23 17:49

Submitted values are:

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**Which area/s of the draft Strategy are you commenting on (select all that apply):**

Targets for reducing deaths and serious injuries , The themes – safe roads, safe road use, safe vehicles and speed management , Movement and place, The social model , Governance, Infrastructure planning and investment , Regional roads , Remote areas, Vehicle safety , Workplace road safety, Indigenous Australians, Vulnerable road users , Other/not listed

**What is your primary area of interest in road safety?**

See attached file

**What road safety issues are the most important to address?**

See attached file

**What do you believe are the strengths of this draft Strategy?**

See attached file

**Is there anything important that you think is missing from this draft Strategy?**

See attached file

**Do you give permission for your submission to be published on this website following the end of the consultation period?**

Yes

## RESPONSE TO THE CONSULTATION DRAFT NATIONAL ROAD SAFETY STRATEGY 2021-30

The Centre for Accident Research and Road Safety - Queensland (CARRS-Q) is one of the leading centres in the world dedicated to research, education and outreach activities in road safety. Its vision is for a safer world in which injury-related harm is uncommon and unacceptable. CARRS-Q was established in 1996 as a joint initiative of Queensland University of Technology (QUT) and the Motor Accident Insurance Commission (MAIC). CARRS-Q builds new scientific understanding that enables regulatory authorities, policy makers, educators and communities to frame strategic choices about applied future actions. This background informs our response to the Consultation Draft of the National Road Safety Strategy 2021-30 (the Draft Strategy).

**CARRS-Q has contributed to and supports the submission made by the Australasian College of Road Safety (ACRS). We join with the ACRS in urging that there be opportunities for genuine consultation regarding the Action Plan.**

We share the concerns raised by the ACRS regarding:

- Overlooking/neglecting recommendations of the Inquiry into the NRSS (which specific points)
- The target for reduction in serious injuries being unambitious
- The lack of incorporation of publication of star ratings for infrastructure safety
- The need for a development of a Regulatory Impact Statement on reducing the urban speed limit
- The need to include intelligent speed assist in the priority technologies for ADRs
- The need for a Parliamentary Standing Committee on Road Safety
- The crucial importance of robust accountability mechanisms, particularly a fully funded independent external advisory group to monitor performance on the NRSS and provide advice to government
- The potential for the Social Model to result in a return to a 'blame the driver' approach to road safety

CARRS-Q is pleased that the Draft Strategy:

- Includes the goal of zero deaths and serious injuries resulting from use of the roads transport system by 2050.
- Includes Workplace Road Safety as a priority
- Recognises the risks associated with 'gig economy' delivery work

**However, we would propose the following improvements to the Draft Strategy:**

1. A clearer presentation of the absolute numbers associated with the per capita targets for reductions in fatalities and serious injuries. They are currently hidden in paragraphs of text. If they are not well-known and publicised, then politicians and community members may be hampered in understanding whether we are on track to achieving those goals or not.
2. A clearer explanation of why the serious injury reduction target is less ambitious than that for fatalities.
3. While the failure to reach the 2011-20 target for fatality reductions is acknowledged on page 5, there is no explanation about why this happened and how the new strategy will avoid this happening again.
4. A progression from the current compartmentalised “Safe Silos” approach to road safety that is prevalent across Australian jurisdictions to the more integrated systems approach that Vision Zero spells out. For example, whether roads are safe or not depends on an interaction between the infrastructure characteristics and the travel speed. The prevalence and severity of the crashes are those which the infrastructure promotes or allows, and that the vehicle cannot prevent or mitigate. While the “Safe Silos” is a common approach, it is a poor reflection of the interrelationships in the underlying vision and will hamper our ability to achieve that vision.
5. While there have been recent efforts to incorporate the concepts of Movement and Place into road safety, we feel that the draft Strategy fails to integrate the two in a comprehensive and effective manner.
6. Better recognition of current and near-future trends that will influence the road safety task within the lifetime of the Strategy. These include:
  - a. Population movements to the edges of metropolitan areas and nearby regional areas. We have already seen high crash rates in areas where minor country roads now serve larger populations who are commuting and attempting to move around as vulnerable road users.
  - b. Promotion of walking. Greater pedestrian activity is being advocated for reasons of health and sustainability. Much pedestrian infrastructure in cities and towns is old, often not well maintained, and not designed with the interaction of pedestrians with cyclists and other users (e-mobility, assistive devices) in mind. While official crash statistics do not include most infrastructure-related pedestrian injuries, promotion of walking is unlikely to be successful if safety across the whole of the walking journey is not addressed. Notably, some safety issues for pedestrians overlap with issues of personal safety, especially for women, that are becoming more prominent in Australian society and politics.
  - c. Increases in cycling. We have already seen increases in numbers of serious injuries and fatalities to bicycle riders. There was a large uptick in numbers of people cycling during COVID restrictions, which governments are keen to encourage, but this will fuel further increases in trauma unless priority is given to dealing with this. The Strategy needs to prioritise this area, not simply to bring about injury reductions from current levels, but to prevent future growth in road trauma.
  - d. Increases in motorcycling. Motorcycling provides an alternative mode for commuting in the current climate where concerns regarding the health aspects of using public

transport have led to large increases in congestion, as demonstrated by recent increases in motorcycle sales and registrations and in motorcycle crashes. As more and more commuters return to workplaces in cities, this trend is likely to exacerbate. There is a huge reservoir of potential increases in the amount of travel by motorcycles because of riders who decide to ride to work using the motorcycle they have been infrequently using for leisure. In addition, there are large numbers of motorcycle licence holders who are not active riders, who are able to become active riders almost immediately. Motorcycling also has the appeal of being a COVID-friendly form of recreation.

7. The section on Vehicle Safety describes technological improvements and mentions the roles of Australian Design Rules (ADRs) and the Australasian New Car Assessment Program (ANCAP). However, it fails to address the policy failure in which the ADRs allow the sale of vehicles which are manifestly unsafe according to ANCAP (i.e., rating as 1 or 2 stars). Thus, the draft Strategy continues to appear lukewarm in its commitment to improving vehicle safety, particularly for disadvantaged groups who may be attracted by lower-priced unsafe vehicles.
8. The section on Vehicle Safety neglects to mention Autonomous Emergency Braking which holds considerable promise, especially with effective detection of vulnerable road users. While there is mention of “automated vehicles” in this section, the assessment of potential benefits of Cooperative Automated Vehicle (CAV) systems is not mentioned, and in particular the improvements to road infrastructure which will be required to support their implementation. It is not realistic to expect local government to fund CAV infrastructure.
9. Need to extend consideration of vehicle safety beyond cars and trucks to also include growing use of e-micromobility. Current discrepancies between vehicle standards and import regulations allow the import of vehicles/devices which are illegal to be used on public roads. For example, high-powered e-bikes are being imported and sold as “e-mountain bikes” which are not legal for use on roads and bicycle infrastructure. This is not clear to purchasers or to enforcement authorities. Australia should examine the suitability of approaches to this problem that are being developed internationally. The technical characteristics of cargo-bikes and small electric vehicles for delivery purposes need to be regulated well to allow them to achieve their potential in terms of congestion and environmental benefits.
10. The draft Strategy uses the term “Indigenous Australians”. Consideration should be given to the appropriateness of this term because some groups find it offensive because of the link between “Australians” and colonisation (see [First Nations, Aboriginal and Torres Strait Islander, Indigenous or Indigenous Australians? \(commonground.org.au\)](https://www.commonground.org.au/)). “Indigenous road users” might be preferred in the Strategy.
11. The title on Page 19 refers to three broad enabling actions, but it is unclear how this relates to the six headings in that section.
12. The roles and responsibilities of each of the three levels of government are described in pp.26-27 of the draft Strategy, but there is little explanation of what is the role/remit of the NRSS, overall, and in each of the priority areas. Could this be included in the Foreword?
13. The use of the term “social model”, in comparison with the use of the same term over many years in disability advocacy, is confusing in the NRSS and concerning in its apparent implications. In the disability area the social model asserts that it is society that creates disability through infrastructure, policies, etc, thus placing the onus on government in

particular to lead change through legislation, standards, guidelines and infrastructure provision. The potential exists for the social model concept expressed in the NRSS to be mis-used as a way to shift responsibility from the government to the community, and shift the emphasis from change in the ecology of road use to changes in attitudes, a weak approach that lacks evidence of effectiveness. It would be useful if further guidance was provided in the draft strategy as to how it is proposed to apply the social model to road safety.

14. There is currently limited coordination of road safety research efforts across the country. While Austroads provides a means for the States and Territories to pursue their specific research needs, little other specific direction and support is provided to the many university-based centres and other groups involved in road safety research. Consideration needs to be given to how to better coordinate and support research efforts at the national level, in order to avoid duplication and to promote ongoing capacity-building.