

From: roadsafetystategy@infrastructure.gov.au on behalf of Office of Road Safety <roadsafetystategy@infrastructure.gov.au>
Sent: Sunday, 21 March 2021 3:01 PM
To: RoadSafetyStrategy
Subject: National Road Safety Strategy 2021-30 - have your say submission - Dr Ray Shuey APM [SEC=OFFICIAL]
Attachments: isf-nrss-submission.docx

Submitted on Sun, 2021-03-21 14:59

Submitted values are:

Name

Dr Ray Shuey APM

Organisation

International Safety Foundation Inc

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State

Vic

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

The social model , Data and performance management, Governance, Infrastructure planning and investment , Risky road use , Other/not listed

What is your primary area of interest in road safety?

Saving lives using an evidence-based approach

What road safety issues are the most important to address?

The evidence-base.
Driver Licensing Systems
Crash Investigation
The drug driving epidemic
The mobile phone epidemic
Community engagement
Integrated programs

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

The social model - If it reaches community engagement

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

1. The evidence-base and governance to see the evidence-base is improved.
2. Driver Licensing
3. Crash investigation
4. The drug driving epidemic
5. The mobile phone epidemic
6. Holistic community engagement

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

Yes



INTERNATIONAL SAFETY FOUNDATION INC.

RE: Response to the consultation process: National Road Safety Strategy 2021-2030

“A 5-star driver can drive safely on a 1-star road. A 1-star driver can drive unsafe on a 5-star road”

It is disappointing to see the same old strategies reincarnated under different themes. While a holistic approach to road safety is essential, the strategy does not acknowledge or follow the evidence-base as it purports to do.

Critical issue: If you don't follow the evidence-base for the problem, how can you possibly identify and achieve evidence-based reforms? Tinkering around the edges for the next ten years will achieve about the same results as for the last ten years! Not much! QED.

Evidence-base? This is clearly lip service and baseless in the strategy. Evidence must be based on facts, science, or research. **Over the last fifty years the evidence-base from research and statistics is that 90% + of all fatal and serious injury crashes are caused by careless or deliberate human behaviours.** This evidence is confirmed annually from the statistics produced from every State and Territory. **Every year, every state!** If you have the best roads and the best cars over the next ten years, the maximum gains you will achieve is 10% reduction in road trauma! (Road building does not = road safety – check the data on any five-star roads in Melbourne, Sydney and Brisbane. If the proposition was true, you would have zero trauma on these roads).

The main stimulus to achieve road safety reform for the foreseeable future must be focused on the driver and address human behaviours. This is a psychology/education solution **not an engineering solution**. Attitudes, behaviours, and a road safety culture. i.e. education/awareness programs combined with road user discipline provided by effective laws and strong road policing through highly visible and active enforcement.

The disproportionate emphasis on roads and infrastructure is clearly demonstrated in the current draft strategy. You cannot **engineer out** human behaviours- illegal, careless, and dangerous driving. (Politicians and senior bureaucrats are overly influenced by engineering not psychology).

NB 1: The nine listed priorities. How do they address the evidence-base? And the priority order? Even in the last category, “Risky road use” (bottom of the pecking order) and ----with irresponsible statements “largely unintentional and unconscious actions that are normalised” – What rot! Drink and drug driving is premeditated, high risk behaviours are premeditated, high speed is premeditated, mobile phone use is premeditated. These are components of the “fatal five”. The draft strategy is providing excuses for high-risk behaviours. **This acceptance is negative reinforcement of bad driver behaviours, which fosters (maybe guarantees) its continuance.**

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NB 2: The Actions documented on Risky road use are **clearly impotent** “increase community understanding” –current surveys will tell you the community understands the risks of drinking, texting, and speed related actions, but chose to ignore them. “Road treatments” should not be categorised under road user behaviours – i.e. here the strategy is not tackling road user behaviours, the perception is you are trying to fix behaviours by road treatments. Likewise, “self-explaining roads,” while an admirable strategy, should not be under actions for Risky road use. (Where is the education to “explain” - self-explaining roads?)

NB 3: if this is an evidence-base strategy why quote statistics from 2017 for a 2021 commencing strategy? **This clearly highlights a lack of currency in the statistics and data analysis which should have a higher priority to ensure the data is accurate and current. This lack of currency in data is an indictment on Australia as a high-income country with over 70 years in road safety reform.**

Community-led programs: This only rates with Indigenous Australians. Why? There is **strong evidence** internationally that success in road safety is achieved through:

- Community engagement
- Community-led programs
- Local solutions for local problems
- Think globally, act locally.

In Australia there are hundreds of highly-committed individuals and road safety groups chipping away with feel good programs but without state or national measurable results. They are often funded by government grants with no clear direction or required to achieve coordinated outcomes. Yet, the strategy does not acknowledge or reference any collective use of the commitment and dedication of these groups or combining their efforts as community-led organisations/initiatives. The mums and dads of our community are the foundation of our nation and endeavours should be made to harness their commitment. **Instead, the Governments are spending billions of dollars on infrastructure and calling this “road safety”. (and now promotes a draft 10-year strategy strongly focused on infrastructure as the “priority” – pretty photos – depicting road upgrades as the magic answer).**

TWO CRITICAL OMISSIONS

- 1. Novice drivers:** The data from all states and territories clearly identify novice drivers as an extremely high-risk category in the **first six months of solo driving**. What other system of training/education has a guaranteed **30% failure rate** – i.e. 30% rating of crashing within the first six months of solo driving. There is **no** standard curriculum, **no** driver coaching programs, **no** competency-based systems, fragmented driver training programs and **no** assistance or guidance to parents/carers who are the bulk of the “trainers”. Yet, the jurisdictions boast the “Graduated Licensing System” (GLS) with 120/110 hours as the best international model. Driver training schools provide focus on “passing the test” many with short-lived **tips and tricks**. The status and method of actual “training” has not changed over 50 years. GLS even promotes the concept that you “learn as you go.” What other system promotes that type of philosophy after you are licensed? **Critically, the driver**



licensing/testing programs do not test against crash causality i.e. any of the five major crash categories. In fact, you can pass your driving licence test without any other road user interaction. Driver trainers can be qualified with as little as two hours on-road training and then transfer this inadequacy of two hours to many learners to show them how to pass a test. This is abysmal. Australians deserve a complete overhaul of the system to a competency-based “**Graduated Education System**”. **The licensing system doesn’t even rate a mention in the draft strategy, yet it is a core problem and importantly the foundation of attitudes, behaviours and the road safety culture to which we aspire. Check any statistics for the evidence-base.**

Crash Investigation: The identified outcomes of any crash investigation must answer the question “*How can the risk of a crash of this nature be prevented in the future?*” as per the Safe System Approach and common logic. The same principles should be used as for aircraft crashes. i.e. learn from every crash and implement reform interventions immediately and strategically.

This draft strategy does nothing to enhance/challenge the current crash investigation process or indeed any development of a “contributory factor data-base” and improve data collection, analysis and actionable reform. **The acceptance and reliance** on outdated data is clearly evident within the draft. **An action to improve the quality of crash investigations and resultant data doesn’t even rate a mention in the strategy.**

OTHER ISSUES

The drug driving epidemic: Clearly an emerging and current road safety issue over the past five years. Where are the strategies to address this in a holistic manner?

Mobile phone epidemic: Research shows mobile phone use is an automated behaviour which transfers to all parts of life including the car. Advertising or telling someone not to do something and expecting a behavioural change is a waste of energy. Everyone knows not to use the phone but chose to do so. In particular “texting” – the technological solution **was available yesterday** on mobile phones to disable texting if the vehicle is mobile, yet governments choose not to impose this restriction.

“**Provide best practice coordinated enforcement**” – statements such as these are meaningless. This is an “upgraded” version of the last 50 years of nonsensical statements “**provide more enforcement**” “**provide better enforcement**”. Rather than bland or generic statements, advice and strategies must be part of any 10-year plan.

“**Strategic focus on the next ten years**” – great concept. However, what have we learned over the last ten years? Why didn’t the past ten years provide a positive road safety return on investment for the money and commitment expended? A complete “no blame” analysis must be undertaken to provide a clear focus on “what works?” and “what doesn’t work?”. The foundation strategy must be right before any continuous improvement through clear accountability, monitoring and evaluation can be undertaken.



Cynical comment:

In accord with past consultation programs, strategies end up as an upgraded version from the year before (or in this case 10 years before) and credence given to those with big-ticket items such as driverless cars and five-star road infrastructure all aimed to excuse and “engineer out” the sins and errors of human behaviours. Notably, the program appears to be driven by Transport & Infrastructure. Follow the money trail for the grants and reform dollars! It is well accepted that highly attuned coordination of Safe Roads, Safe Vehicles and Safe Road Users is mandated under the Safe Systems Approach. All must have a focus on speed management.

Currently the proportionality of effort and funding is skewed which is not maximising the most productive return on investment. Saving lives requires a mindset change of politicians and bureaucrats to engage the community in evidence-based reform!

“You can drive safely on a 1-star road unsafe road or you can drive unsafe on a 5-star road as demonstrated by millions of drivers daily. 1,2,3 star drivers are and will continue to be a danger on our new infrastructure and 5 -star roads.

I am happy to discuss and substantiate any of the afore-mentioned issues.

Yours sincerely,



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