

From: roadsafetystrategy@infrastructure.gov.au on behalf of Office of Road Safety <roadsafetystrategy@infrastructure.gov.au>
Sent: Tuesday, 23 March 2021 10:30 AM
To: RoadSafetyStrategy
Subject: National Road Safety Strategy 2021-30 - have your say submission - Rob Langridge [SEC=OFFICIAL]
Attachments: fcail-response---a-national-road-safety-strategy---consultation-draft-february-2021.pdf

Submitted on Tue, 2021-03-23 10:28

Submitted values are:

Name

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State

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

The themes – safe roads, safe road use, safe vehicles and speed management , Infrastructure planning and investment , Regional roads , Vehicle safety , Workplace road safety, Vulnerable road users , Risky road use

What is your primary area of interest in road safety?

The FCAI is the peak Australian industry organisation representing over 50 global automotive brands who design, manufacture, and sell light duty passenger vehicles, light commercial vehicles, and motorcycles around the world.

What road safety issues are the most important to address?

Please refer to the attached written response

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

Please refer to the attached written response

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

Please refer to the attached written response

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

Yes

FCAI Submission to The Office of Road Safety - New National Road Safety Strategy – Consultation Draft 2021 to 2030.



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INTRODUCTION

The Federal Chamber of Automotive Industries (FCAI) welcomes the opportunity to provide input into the Office of Road Safety concerning the new **National Road Safety Strategy (NRSS) 2021 to 2030 – Consultation Draft – February 2021**.

FCAI commentary will only be specific to certain elements of the proposed road safety strategy as it pertains to light duty motor vehicles (passenger cars and light commercial vehicles) and motorcycles.

The FCAI is the peak Australian industry organisation representing over 50 global automotive brands who design, manufacture, and sell light duty passenger vehicles, light commercial vehicles, and motorcycles around the world.

The automotive industry in general, and the FCAI membership specifically has and continues to make significant contributions towards improved vehicle safety in Australia providing advanced technologies and innovations to market in advance of and exceeding minimum regulatory standards or non-regulatory processes. It is most often this industry driven innovation that provides technologies driving regulation rather than vice versa.

FCAI strongly supports a Safe Systems approach for road safety in general and the NRSS specifically. This integrated approach involves all factors including road safety management, road infrastructure, road user behaviour, traffic rules' enforcement, and safer vehicles. Such an approach is essential and must not be contradicted by attempts to single out individual factors in isolation and applies to all users of the road including non-traditional such as pedestrians and cyclists.

Education, particularly long-term education programs across the community, have been shown both domestically and internationally to improve road safety outcomes across all user groups. From the FCAI's review of the strategy, there is an insufficient reference to community education in all the specific focus areas.

Following the video consultation undertaken on 12th March, we are concerned that the NRSS is intending to only consult on the strategy document and referred to action plans that are yet to be developed. These action plans are an integral component of any road safety strategy and FCAI urges NRSS to consult appropriately on these action plans as they are being developed. With so many advances in the vehicle design FCAI recommends that:

NRSS engages with the road safety community and consults appropriately on the action plans. NRSS needs to consider technology advances appropriately along with the infrastructure requirements to realise the highest benefit.

Speed Management is Critical

The NRSS places speed management as a critical element of the strategy and uses Wramborg's model as the justification for such an approach.

Wramborg's model was released in 2005 and it was based largely on Scandinavian crash and fatality data from the preceding years – typically 10 years; there have been numerous advances in vehicle

design since 1995-2005 and any reliance on this model or the underlying data may be well outdated and not particularly relevant to the Australian context.

Austrroads in their 2015 report “**Improving the Performance of Safe System Infrastructure**” recommended: *“Given that more than a decade has passed since, and much new research has been published, the relationship between speed and injury severity may be due for review and discussion. This would be prudent given the 2021 horizon for the development of the new National Road Safety Strategy in Australia.”* And we are now discussing the next stage of the road safety strategy encompassing 2021-2030.

Whilst FCAI considers speed management to be an essential component, as the safety of both vehicles and infrastructure design have been substantially improved and will continue to do so over the decade life of this strategy, an over-weighted emphasis on speed management may preclude other initiatives being realised in the context of increasingly advanced vehicle designs and the infrastructure required.

Vehicle manufacturers recognise the critical nature of speed management in their vehicle designs and are increasingly fitting in-vehicle speed alerts and advanced systems that can read ISO standard speed limit signs – again these systems require standardised road signs that are maintained to ensure clear camera sight lines.

FCAI recommends that a greater emphasis be placed on developing plans based on current research and facilitating the development of research that is required to base strategies and actions on data that is current.

The following commentary is provided specifically into the Key Priority areas that are relevant to FCAI’s members.

INFRASTRUCTURE PLANNING AND INVESTMENT

FCAI strongly supports development of infrastructure that is focused on safe system design and is future focused. Modern vehicles are increasingly being fitted with Advanced Driver Assistance Systems (ADAS) as well as being increasingly connected allowing Connected Intelligent Transport Systems (C-ITS) to be able to be deployed.

To gain the maximum benefit of these systems the roadside infrastructure needs to be developed to support the operation. Currently, Lane Departure Warnings such as Lane Keep Warnings (LKW) and Lane Keep Assistance (LKA) are being fitted to vehicles and simply, this requires appropriate lane markings (at least a centre line and edge of road line) to be installed on all roads. This simple level of infrastructure development can avert a substantial number of “run off road” and “cross centre line” events for vehicles increasingly being fitted with these systems.

In C-ITS applications, the development of roadside infrastructure that allows vehicle to infrastructure and vehicle to vehicle communications to occur, is critical in reducing intersection collisions particularly in CBD and metropolitan areas along with the associated benefits of fatality and serious injury reductions.

FCAI recommends: A stronger emphasis on Infrastructure planning and development that acknowledges the development requirements necessary to realise the road safety benefits of emerging vehicle technologies such as ADAS and C-ITS systems.

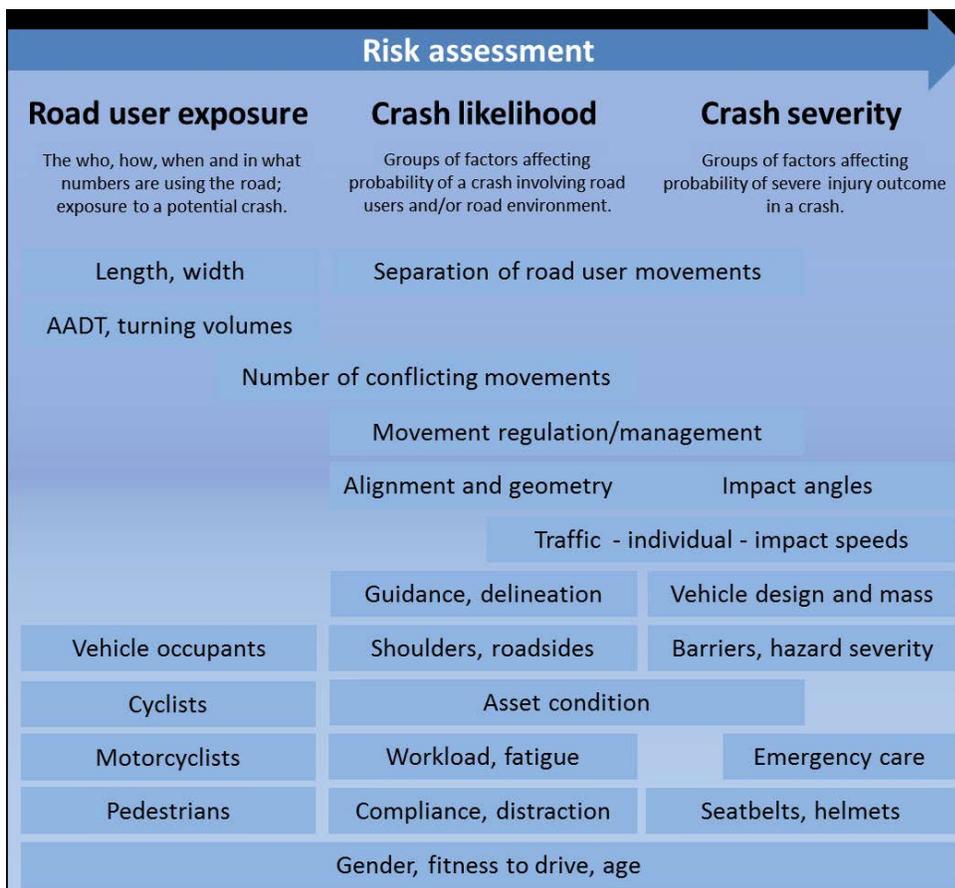
REGIONAL AND REMOTE ROADS

With lane departure crashes being the most common causes of road crash deaths (and by extension serious road trauma) in inner and outer regional areas, the emphasis on the development of network safety plans that include as a priority:

- At least lane line marking treatments for the left roadside and the centreline of the road – this would enable in-vehicle LKW and LKA systems to operate correctly.
- Audio-tactile markings, FCAI supports this initiative which would benefit all vehicles.

We note the intention to undertake a Regulatory Impact Statement (RIS) on reducing the open road speed limit. Before such an approach is embarked on, it is necessary to review many of the other factors involved. A singular focus on speed management risks masking and potentially ignoring the other factors that lead to potential collisions in the first place.

The Austroads 2015 report “**Improving the Performance of Safe System Infrastructure**” identified and proposed a risk assessment model that considered many elements inclusive of speed.



Vehicle safety systems have advanced substantially both in terms of crash avoidance technologies as well as crash mitigation and passenger safety cell protection in the event of an accident and therefore all aspects need rigorous consideration without singling out an individual factor such as speed alone.

VEHICLE SAFETY

FCAI is generally very supportive of pursuing technological improvements and uptake of safer vehicles. In the actions area we recommend the following amendments:

- Prioritise and adopt proven technological improvements for all vehicle types through new Australian Design Rules as quickly as possible (e.g., systems assisting drivers to stay in their lane, and systems that provide warnings when drivers are drowsy or distracted) **as well as the infrastructure required to realise the full road safety benefits from these systems.**
- Encourage and promote voluntary uptake of vehicle safety technologies ahead of regulation, including through ongoing support of the Australasian New Car Assessment Program (ANCAP) **where an appropriate Cost Benefit Analysis confirms application** as well as through fleet purchasing policies **that recognise the inherent safety features of 4- and 5-star vehicles consistent with NCAP in Europe.**

WORKPLACE ROAD SAFETY

FCAI is supportive of the actions identified by the NRSS.

VULNERABLE ROAD USERS AND MOTORCYCLISTS

The FCAI is concerned with the overall grouping of Motorcycles in the Vulnerable Road User (VRU) category which includes pedestrians and bicycle riders along with numerous others. For the majority of VRUs such as pedestrians or bicycle riders there are several unique strategies usually focused on separation from vehicles wherever possible and involving speed reduction where interaction with other vehicles is likely.

In the case of motorcycles, they are rarely, if ever, separated from mainstream traffic and speed management principles do not apply in the same manner. Motorcycles are vulnerable road users; however, they deserve their own grouping given the unique circumstances of operation and should never be grouped with pedestrians or bicycles.

In terms of Pedestrians and bicycle riders, no doubt the movement and place framework will assist developing safe speeds and tailored road treatments.

However, we do not consider that enough attention is being paid to education or the responsibilities of VRUs when using roadways – how do we deal with distracted pedestrians for example?

VRU behaviour is a key issue that needs addressing in conjunction with all the other mitigation strategies to minimise the result of vehicle to VRU impacts.

FCAI supports the graduated licensing system for motorcycle users although costs to undertake this across the states and territories varies significantly with some costs becoming prohibitively expensive.

FCAI agrees that a strategy of providing consumers with objective independent information on the injury protection and thermal management of motorcycle protective jackets, pants and gloves should be included and could be improved with an expansion of this information to include other forms of PPE used by motorcyclists including but not limited to full leathers, boots, back protectors, chest protectors, where appropriate.

FCAI recommends separation of the Vulnerable Road User Groups to identify appropriate actions necessary more clearly.

RISKY ROAD USE

FCAI agrees with the general concept of generally improving community understanding of risky road use and addressing these matters through education and enforcement.

Vehicle manufacturers go to great efforts to minimise risky road use by motorists, utilising technological solutions to ensure:

- messaging to drivers is controlled
- speeding through inattention or fatigue is being alerted to with overspeed warnings using traffic sign recognition.
- Lane Keep Warning and Lane Keep Assistance to name a few.

However, we are concerned that there is insufficient focus on non-traditional road users such as pedestrians and cyclists who do use roads and are often distracted especially by technology in various forms.

FCAI recommends that there needs to be a more significant focus on all road users to effectively reduce the road toll.

REDUCTION IN AGE OF THE FLEET

As the NRSS has noted the average age of the Australian fleet has not reduced and in some jurisdictions has increased.

Modern vehicles have far greater safety features than older vehicles and older vehicles whilst representing a smaller share of the fleet are represented in a larger disproportionate share of fatalities according to ANCAP analysis.

FCAI recommends stronger emphasis on a range of initiatives to reduce the average age of the fleet to reduce fatalities and serious injuries.

FCAI recommends that the first place to start is set a target reduction.

Additionally, a well-designed road user charge in conjunction with wholesale tax reform can reduce significant upfront cost from motor vehicles making vehicles more affordable.

NOVICE DRIVERS

FCAI recognises that the NRSS provides a specific priority on Indigenous Australians due to their unique vulnerability in the transport system and their overrepresentation in road trauma. FCAI supports this priority however, FCAI believes that priorities should be expanded to include the young and inexperienced sector of the driving population due to their over-representation in fatality and serious injury accidents. This over-representation has proven difficult to address in previous road safety action plans but represents a large opportunity for success in the new National Road Safety Strategy.

Targeted approaches using existing and expanded education streams within the NRSS's social model could be used to reduce risk taking behaviours prevalent in this vulnerable group of road users. Programs to move this group of users into safer vehicles and to increase their safer usage should be considered in the NRSS.

FCAI recommends that the NRSS provides a specific priority aimed at young and inexperienced drivers who are generally overrepresented in road trauma statistics.