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Sent: Tuesday, 23 March 2021 4:20 PM
To: RoadSafetyStrategy
Subject: National Road Safety Strategy 2021-30 - have your say submission - Bill McKinley [SEC=OFFICIAL]
Attachments: 20210323atanrssssubmissionfinal.pdf

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Submitted values are:

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Australian Trucking Association

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State

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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 , Remote areas, Vehicle safety , Heavy vehicle safety , Workplace road safety, Vulnerable road users , Risky road use

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

Yes



DRAFT 2021-2030 NATIONAL ROAD SAFETY STRATEGY

AUSTRALIAN TRUCKING ASSOCIATION SUBMISSION 23 MARCH 2021

1. About the Australian Trucking Association

The Australian Trucking Association and its member associations collectively represent 50,000 businesses and 200,000 people in the Australian trucking industry. Together, we are committed to safety, professionalism and viability.

2. Introduction and summary

Australia's infrastructure and transport ministers released the draft 2021-2030 National Road Safety Strategy on 23 February 2021.¹

The release of the draft followed an inquiry into the 2011-2020 National Road Safety Strategy,² as well as a review of road safety governance.³

This submission sets out the ATA's views on some of the key issues raised by the draft.

3. Targets in the draft strategy

The draft strategy proposes that governments set, as targets—

- a 50 per cent reduction in fatalities per capita by 2030
- a 30 per cent reduction in serious injuries per capita by 2030.⁴

The ATA welcomes the targets, but recommends that the strategy, or at least its first action plan, should **include five year as well as 10 year targets** to focus attention on the need to act now.

In addition, the ATA considers that the strategy should include **subtargets for each of its major themes and priorities**. It is not possible to determine the resourcing required for, say, safer roads without understanding the contribution that safer roads are expected to make toward the overall targets.

¹ Infrastructure and transport ministers, [National road safety strategy 2021-30: consultation draft](#). February 2021.

² Woolley, J and J Crozier, [Inquiry into the national road safety strategy 2011-2020](#). September 2018.

³ Road safety taskforce, [Review of national road safety governance arrangements: final report](#). June 2019.

⁴ Infrastructure and transport ministers, 2021, 2.

4. A stronger adoption of the safe systems approach

As figure 1 shows, the draft strategy proposes that governments adopt an abbreviated version of the safe system approach.

Figure 1: Two versions of the safe systems approach

Safe systems approach	Draft strategy
Safe speeds	
Safe roads	Safe roads
Safe vehicles	Safe vehicles
Safe people	Safe road use
Better post-crash care	

The draft strategy argues that speed management, supported by the movement and place approach, is critically important.⁵ The ATA agrees: that's why **speed management should remain one of the key themes or pillars of the strategy.**

One advantage of designating speed management as a theme would be that **the use of the movement and place approach could become an action under this theme.** The draft places too much emphasis on this uncontroversial, but essential, urban planning concept.

The adoption of the movement and place approach must not be used to restrict delivery truck access to streets designated as 'places.' As the success of removing freight curfews in the pandemic shows, increased mobility can – when carefully handled – work for all.

Better post-crash care should also be included in the strategy.

The supporting material for the draft highlights enhanced post-crash response as an important way to improve road safety in remote areas.⁶ The strategy rightly identifies remote area safety as a priority.⁷

The ATA's member associations are already taking action. With the support of the Australian Government's Heavy Vehicle Safety Initiative and the NHVR, two ATA member associations – the Western Roads Federation and the Northern Territory Road Transport Association – are delivering a course for truck drivers in remote areas about—

- how to communicate directly with emergency services, including the RFDS
- maintaining safety at the scene for both the driver and others
- conducting a more detailed casualty assessment (once critical life-saving techniques have been applied) to look for and identify any other injuries that may require treatment or management
- dealing with trauma victims for extended periods before the arrival of emergency services personnel and improvising when needed.⁸

⁵ Infrastructure and transport ministers, 2021, 14.

⁶ Office of Road Safety, [Remote road safety](#). Fact sheet.

⁷ Infrastructure and transport ministers, 2021, 16.

⁸ [Industry shines light on remote transport 'hidden tragedy'](#), ATN, 22 July 2019.

5. Proposed actions under the plan

Pages 15-18 of the draft strategy list 30 actions to be taken on nine priority areas.

The strategy does not attempt to quantify whether the listed actions would achieve the proposed 2030 targets.

Table 2 examines the proposed actions that are particularly relevant to trucking operations (whether listed in the heavy vehicle section or not).

Table 2: Proposed heavy vehicle actions

Proposed action	ATA recommendation
Infrastructure funding at all levels will be linked to measurable improvements in safety	Infrastructure funding must be linked with planning for and investment in truck rest areas on a corridor basis.
Deliver systematic safety improvements on a corridor basis	<p>This should apply to all road infrastructure investment and be aligned with the Austroads guidelines for the provision of heavy vehicle rest area facilities.</p> <p>Infrastructure planning and funding must also seek to reduce congestion, which leads to driver frustration and risky road use.</p>
Development of network safety plans, to prioritise road safety treatments where they will have the most impact	These actions should be integrated with the development of the National Service Level Standards Framework.
Implementation of staged safe system treatments (depending on road traffic volumes)	The proposed NSLSF should incorporate safe system treatments and be used to prioritise infrastructure investment.
Regulate for and promote heavy vehicle safety technologies	<p>The proposed action should specify how the government would accelerate the ADR development process and the specific technologies that would be promoted.</p> <p>Alternatively, the strategy could specify that the detailed work program will be set out in the action plans under the strategy.</p>
Strengthen national heavy vehicle operational regulation	<p>The Heavy Vehicle National Law (HVNL) is being reviewed. Accordingly, the proposed action should be rewritten to read—</p> <p>Through the HVNL review, recast heavy vehicle regulation and enforcement so they—</p> <ul style="list-style-type: none"> • are risk-based • incorporate just culture principles • improve the safety focus of all parties in the chain of responsibility.

Proposed action	ATA recommendation
Protect all road users from conflict with construction vehicles through state/territory government construction contract requirements such as requiring inclusion of safety technologies	<p>The proposed action should reference the work being undertaken by the Construction Logistics and Community Safety – Australia (CLOCS-A) Steering Group. A project to support the development of CLOCS-A was funded through HVSI.</p> <p>The action should commit the Australian Government to requiring CLOCS-A participation as a condition of funding state infrastructure projects.</p>
Encourage and support organisations to take responsibility for road and vehicle safety across their operation by taking actions and setting policies that support and enhance the individual responsibility of workers and create a road safety culture	<p>The strategy should do more than encourage and support organisations.</p> <p>The proposed action should be rewritten to read—</p> <p>Support organisations to build a stronger road safety culture, including through amendments to the HVNL and road transport enforcement policy.</p>

In addition, the ATA considers that the actions under the strategy should include—

- strengthening truck driver licensing and training
- training for novice car drivers in how to share the road safely with trucks, as the Productivity Commission has recommended.⁹

6. Use of the social model of road safety

The ATA does not support the social model of road safety proposed in the strategy¹⁰ and its supporting fact sheets.¹¹

The inquiry into the 2011-2020 strategy found that it did not succeed because of implementation, governance and accountability failures.¹²

The proposed social model would not help to address these failures. The model would assign responsibility for road safety outcomes to individuals, community groups and organisations – and dilute the responsibility of governments to act themselves.

The heart of the proposed social model would be individuals taking responsibility for their own actions. But that approach would be inconsistent with the overarching principle of the safe systems approach to road safety – which is that people make mistakes.

⁹ Productivity Commission, [National transport regulatory reform](#). Report 94, 7 April 2020 (released 1 October 2020). 151.

¹⁰ Infrastructure and transport ministers, 2021, 19.

¹¹ Office of Road Safety, [What is a social model approach to road safety?](#) Fact sheet.

¹² Woolley, J and J Crozier, 2018, 6-7.

The ATA is also concerned about the planned implementation of the model. As an example of how the social model could work in practice, the strategy states that—

A starting point [for the social model] could be to work with a high-profile sporting club to establish a strong road safety policy across all of its operations and be a champion for cultural change.¹³

The Australian Government adopted this approach in 2009, when it appointed four high profile road safety ambassadors to communicate road safety messages to the broader community.¹⁴ The approach was not successful.

The ATA recommends that the references to the social model be removed.

As alternatives, the strategy should emphasise the need for governments to—

- build stronger partnerships with industry and the community
- develop policies to build stronger safety cultures in government agencies, regulators and industry, instead of the social model's emphasis on individual behaviour. This alternative approach, which is most fully implemented in aviation, recognises that a safe system must accommodate human error and deal with mistakes justly.

7. Governance and accountability

The success of the 2021-2030 strategy will depend on its governance and accountability arrangements. Unfortunately, the draft strategy does not go far enough.

At the ATA's urging, the 2018 inquiry¹⁵ and the Productivity Commission¹⁶ both recommended the adoption of no-blame road safety investigations as a supplement to the current work undertaken by the police and state coroners.

Accordingly, the ATA considers that the strategy should **include extending the ATSB's existing role to include no-blame investigations of crashes involving trucks.**

The ATSB's work would provide valuable insights and recommendations for improving safety.

The ATA considers that this approach would be superior to appointing a formal external advisory group, as raised for consideration in the strategy.¹⁷

¹³ Infrastructure and transport ministers, 2021, 19.

¹⁴ Albanese, A (Minister for Infrastructure, Transport, Regional Development and Local Government). [A new national voice on road safety](#). Media release, 6 November 2009.

¹⁵ Woolley, J and J Crozier, 2018, 36.

¹⁶ Productivity Commission, 2020, 291.

¹⁷ Infrastructure and transport ministers, 2021, 11.