

Gabby O'Neill
Office of Road Safety
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Dear Gabby

National Road Safety Strategy Feedback

I am very disappointed to see a national target that is out of step with the global targets agreed in Sweden and promoted by the World Health Organisation. The targets to halve the absolute number of road deaths and injuries by 2030 will form the basis of a Heads of Government meeting at the UN General Assembly in 2022. Our leaders will be embarrassed to stand alongside other world leaders' with a target that will ensure we go backwards against every other EU and OECD nation. The respect we have gained for brave and courageous leadership in our response to COVID19 will be forgotten as our approach to the road safety pandemic limps to an unambitious target.

With 400,000+ deaths and injuries projected over the next 10 years in Australia this is unacceptable, and we must, at the very least, align our targets with the global agenda. Are the 89 people who would otherwise die in 2030 worth it? Are the 60,000+ extra people injured with brain and spinal injuries, limb fractures and internal injuries over the next ten years' worth it? Are the \$45 billion+ in extra trauma cost savings possible over the Decade worth aligning with the global target? If we retain the current targets we will need to reword the section on "where we want to be" to say Australia would like to move from 15th best in the OECD to worse than 25th by 2030¹.

Please update the targets to "Fatalities reduced by 50%" and "Serious injury reduced by 50%" based on actual numbers. Why not? Can that difference be justified? In simple terms achieving these targets will save at least \$75 billion over the Decade and would be a great starting budget to achieve the outcome with a BCR of 1 or greater. No trade-off between health and the economy – just a pure good investment. Adoption of annual Federal investment / road safety fund of \$3 billion a year as recommended in the National Inquiry Recommendations is a proportionate contribution that must be stated.

As highlighted in the Inquiry report if we want the stated Vision Zero by 2050 we must be looking at Vision Zero in CBDs and major highways by 2030. Our strategy and action plan must change the status quo and deliver step-change results in these and other key areas. A 41% reduction in deaths and 18% reduction in serious injuries by 2030 is simply not good enough.

¹ https://www.itf-oecd.org/sites/default/files/docs/irtad-road-safety-annual-report-2020_0.pdf

National Road Safety Strategy 20201-2030 Consultation Draft Feb 2021

To review the strategy without the action plan is difficult. I accept that many of my comments may be addressed by a well-formed action plan that has taken account of the Inquiry recommendations, many roundtables, existing data, consultations and submissions already provided and provide defined and measurable targets with associated funding and accountabilities documented. I look forward to reviewing the action plan document that captures the efforts and inputs already provided and updated to ensure the 50% reduction targets aligned with the rest of the world will be met.

In relation to AusRAP activity it has now been agreed in principle and fully supported that Austroads will formally take over the national programme licence and national programme leadership role in Australia. This reflects the large scale of assessments and data already collected to the iRAP global standard (200,000km+) by state and local government jurisdictions and other AusRAP activity including:

- integration with State road agency asset management systems,
- establishment of standard KPIs for infrastructure safety performance²,
- innovative AiRAP approaches to data collection underway,
- integration of Star Rating assessments with claim and injury data,
- specification of 3-star or better outcomes at the project³ and corridor level⁴ in support of the Global Road Safety Performance Targets⁵ agreed by UN Member States including Australia,
- establishment of a joint infrastructure risk rating technical working group covering iRAP and Austroads partnerships,
- integrated product management and system support around the iRAP and Austroads tools used by jurisdictions across Australia.

Key comments on the Strategy document:

- the disappointing targets have been discussed in my introductory comments,
- resourcing, capacity, budgets and expected contributions to the desired reduction in deaths and injuries have not been quantified and the lack of resourcing commitments and targets in the strategy document is noticeable,
- the role of the proposed Permanent Standing Committee on Road Safety is not stated or detailed in the document or the chart on page 25,
- while the roles of the Australian Government in playing a national coordination role in relation to the health system is stated, post-crash care is missing from the whole strategy and the opportunity to ensure a COVID-style response to data coordination and speed of reporting and response is missing,
- a strategy with use of the word “may” does not support the intent for accountability and ensuring implementation,

² <https://www.irap.org/2020/09/are-you-developing-your-next-road-safety-action-plan/>

³ <https://www.rms.nsw.gov.au/projects/01documents/princes-highway/jervis-bay-road-to-sussex-inlet-upgrade-strategic-corridor-option-report-2020-11.pdf>

⁴ <https://www.midlandhighway.tas.gov.au/about-the-action-plan>

⁵ https://www.who.int/violence_injury_prevention/road_traffic/12GlobalRoadSafetyTargets.pdf

- safe roads (3-star or better for all road users / safe system / movement and place) are a key part of providing for vulnerable road users and the diagram on page 13 should capture that link between vulnerable road users and safe roads,
- upskilling local government captures key points except for the fact that in many cases their available resources are insufficient to drive real change and impact on the road trauma levels. Working within “available resources” at a LGA level will not achieve the desired result and both upskilling and resourcing of local government needs to be addressed,
- the roles and responsibilities are well-stated and these must flow through to the action plan. In noting the Federal Government role in investing in road infrastructure there remains the opportunity for the Federal Government to formally support Austroads in their programme leadership of AusRAP activity Australia-wide in the same way the ANCAP programme is supported. This will ensure the efficient flow of AusRAP-related KPI data to support the National Data Hub can be enabled.

Infrastructure Planning and Investment Fact Sheet

- Important opportunity to connect the global 30km/h speed limit movement, with the Wramborg chart, AusRAP and the movement and place categories (e.g. at the very least “City Places”) that contribute to vision zero 5-star cities by 2030⁶,
- as highlighted in the opening discussion, the application of the iRAP global standard by governments in more than 100 countries worldwide and here in Australia via Austroads and the state agencies is not stated. Given the sheer scale and application of the free global tools by Government here in Australia this is a surprising and disappointing omission.

Performance Monitoring Fact Sheet

- The use of population targets is not supported. The transparency of showing the expected 41% reduction in actual deaths and 18% reduction in actual injuries is applauded but it sadly demonstrates clearly how far backwards from the global targets we are willing to go,
- the European Union is using RAP Risk Maps⁷ for standardised geographic reporting of fatal and serious injury crash rates per kilometres, per kilometre travelled and by road user and other sub-categories and can be easily included in the performance monitoring framework in Australia as is required by the EU RISM Directive,
- the inclusion of reporting by crash types is supported and can be further expanded to capture key road attributes and the star rating performance of the road where the crash occurred in the longer term. Preliminary work in this area has already occurred in a number of jurisdictions.
- the safety performance indicators can build on the existing AusRAP data⁸ and related Austroads network safety plan / light star rating data approaches as required. There is already 200,000km of existing data and innovative approaches by MRWA and Transport for NSW that will scale the availability of this iRAP global standard data very quickly,
- output measures that report the Star Rating of implemented upgrades (km and per km travelled) can be easily facilitated by regular data collection as legislated by the European Commission in Europe. Likewise progress towards the 2018-2020 Minister-agreed National Road Safety Action Plan targets for 80% (state highways) and 90% (national highways) of travel on 3-star or better roads can be easily tracked. Predicted lives and injuries saved can also be reported based on the integrated FSI estimates.

⁶ <https://www.irap.org/2020/10/new-irap-star-ratings-of-nacto-gdcis-global-street-design-guide-resource/>

⁷ <https://eurorap.org/slain-project/>

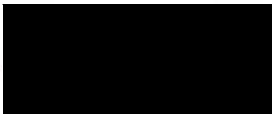
⁸ <https://resources.irap.org/General/Road Infrastructure KPIs using the iRAP Global Standard.pdf>

Top safety performance indicators – tracking performance Fact Sheet

- The AusRAP Risk Maps, Star Ratings and Fatality and Serious Injury estimates provide ready to use performance indicators that can also support global benchmarking,
- the new metrics proposed for road attributes ignores the great work being undertaken by jurisdictions now. Introducing new unspecified attributes will create major issues around harmonisation of data that is already the case with serious injury data in this country,
- given the availability of 200,000km+ of existing data and widespread use by road agencies across Australia, the use of the iRAP global standard for definition and coding of road attributes provides an established and cost-efficient way to leverage existing investment by road agencies across the country. Refer “Road Infrastructure KPIs using the iRAP Global Standard”⁹ for further details noting their use will be overseen by Austroads as part of deployment of AusRAP in Australia.

In closing, I reiterate my support for improved road safety outcomes in my home country of Australia. I am concerned though by our non-ambitious targets, lack of resourcing commitments and lack of specific accountable KPIs in the strategy document. Leadership is evident in many other countries globally and this strategy is an essential component of returning Australia to global leadership in road safety. Unfortunately, in comparison with other initiatives globally, I do not believe the strategy in its current form will inspire and create the environment for that to happen in Australia. While I acknowledge the Action Plans may address some of my concerns there is some fundamental changes needed to the current strategy to truly return Australia to a trajectory of zero road deaths and injuries by 2050.

Yours sincerely



Rob McInerney
CEO, iRAP

For further details please refer to:

- [National Inquiry Recommendations](#)
- [Joint Select Committee on Road Safety submission](#)
- [Victorian Government Parliamentary Inquiry submission](#)

⁹ <https://resources.irap.org/General/Road Infrastructure KPIs using the iRAP Global Standard.pdf>

iRAP Projections of Annual Death and Injury in Australia and costs based on TAC claim data

The Human Impact of Road Injuries every year		
NEW VICTIMS EVERY YEAR	HUMAN IMPACT	NEW COSTS EVERY YEAR
1,351	Lives Lost	\$ 4.9 billion
299	Severe Acquired Brain Injury	\$ 3.3 billion
5,923	Fractures - Limb	\$ 2.1 billion
3,599	Internal Injuries	\$ 1.7 billion
2,484	Brain Injury (Mild) / Head Injury	\$ 1.3 billion
10,349	Soft Tissue (Neck / Back) / Whiplash	\$ 974 million
19	Quadriplegia	\$ 599 million
2,632	Fractures - Other	\$ 591 million
7,500	Contusion / Abrasion Laceration	\$ 341 million
827	Dislocations	\$ 307 million
447	Other Spinal	\$ 279 million
29	Paraplegia	\$ 257 million
3,642	Other Injuries	\$ 178 million
321	Degloving	\$ 162 million
1,449	Sprains / Strains	\$ 109 million
894	Concussion	\$ 68 million
43	Amputations	\$ 40 million
55	Burns (Severe / Moderate)	\$ 16 million
13	Nerve Damage	\$ 4 million
5	Lost Of Sight / Eyes	\$ 1 million
41,881	TOTAL	\$ 17.2 billion

Refer <https://www.vaccinesforroads.org/> for further details.