



## **INQUIRY INTO ROAD SAFETY JOINT SELECT COMMITTEE ON ROAD SAFETY**

### **JOINT SUBMISSION 7 SEPTEMBER 2021**

#### **1. About the Australian Trucking Association and National Road Transport Association (NatRoad)**

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.

NatRoad is Australia's largest national representative road freight transport operators' association. NatRoad represents road freight operators, from owner-drivers to large fleet operators, general freight, road trains, livestock, tippers, car carriers, as well as tankers and refrigerated freight operators.

NatRoad is an ATA member association.

#### **2. Summary of recommendations**

##### **Recommendation 1**

The Joint Select Committee on Road Safety should recommend that the Australian Government take immediate action to extend ATSB safety investigations to heavy vehicle crashes.

##### **Recommendation 2**

The Australian Government should require all infrastructure funding projects to apply the Austroads rest area guidelines to the planning, design and delivery of road infrastructure.

##### **Recommendation 3**

The *National Land Transport Act 2014* should be amended to include safety as a focus.

##### **Recommendation 4**

The Australian Government should change its approach to funding road projects to:

- require project assessments to use the willingness to pay approach in valuing the lives saved and injuries avoided from safety improvements
- prioritise funding for projects aimed at minimising road safety risks
- prioritise funding for projects which address infrastructure gaps identified by the National Service Level Standards Framework
- require the adoption of safe system principles for project design
- specifically target funding for upgrading unsafe remote and rural roads.

### **Recommendation 5**

The Conran regulatory impact assessment reforms should be extended to the Commonwealth, to allow agencies to select the option which saves the greatest number of lives/prevents the greatest number of serious injuries.

## **3. Introduction**

The ATA and NatRoad support Vision Zero and commend the joint select committee and the Australian Parliament for their ongoing resolve to eliminate road crash fatalities by 2050.

This submission raises some key priorities which should be fast tracked by the Australian Parliament but does not represent the full extent of safety policies of the ATA and NatRoad.<sup>1</sup> Rather, this submission targets five key areas where immediate reform is sought.

## **4. Safety focused crash investigation**

The need for no-blame safety investigations of heavy vehicle crashes has been recommended by both the independent review of the National Road Safety Strategy<sup>2</sup> and by the Productivity Commission.<sup>3</sup>

Presently, road crashes are investigated by the police and the coronial system. While this system may meet the needs of the legal and insurance systems, it is not achieving the reduction in road crashes that governments should be seeking. In addition, there is a dearth of material on heavy vehicle crash causation analysis so that targeted action is more difficult to take.

In contrast, the Australian Transport Safety Bureau (ATSB) conducts independent investigations of transport crashes and other safety occurrences in the aviation, marine and rail modes of transport. Lessons arising from ATSB investigations are used to reduce the risk of future accidents and incidents through the implementation of safety action by industry and the Government.

The ATSB also seeks to improve safety and public confidence in those transport modes by pursuing excellence in safety data and research and fostering safety awareness, in addition to independent investigation of accidents.

The ATSB is an independent statutory agency that is separated from transport regulators, policy makers and service providers. It is not a function of the ATSB to apportion blame or to provide a means for determining liability and that perspective must be maintained in any heavy vehicle investigations.

---

<sup>1</sup> Additional road safety recommendations were made in submissions to the first Joint Select Committee on Road Safety of the 46<sup>th</sup> Parliament, in addition to recent consultations on the National Road Safety Strategy and the National Heavy Vehicle Regulator's Heavy Vehicle Safety Strategy.

<sup>2</sup> Woolley, J. & Crozier, J., September 2018. [National Road Safety Strategy Inquiry Report 2011-2020](#). 35, 36.

<sup>3</sup> Productivity Commission, April 2020. [National Transport Regulatory Reform Inquiry Report](#). 35.

As stated by the ATSB, no blame does not mean no responsibility. It means that disciplinary action and criminal or liability assessment are not part of an ATSB safety investigation and should, if necessary, be progressed through separate parallel processes.

Introducing ATSB investigations of road crashes involving trucks would supplement, not replace, existing police and coronial investigations and would provide valuable insights and recommendations for improving safety. The introduction of the ATSB investigative process could be facilitated by phasing in its involvement, for example by limiting its initial investigations to multi-vehicle fatalities. The fundamental point is, however, that without a better focus on the causes of crashes, reaching zero road fatalities will be difficult if not impossible. Measures to reduce road incidents must be targeted to their cause and it is therefore axiomatic that more needs to be understood about causation.

The ATA and NatRoad strongly recommend that the committee prioritise this necessary reform.

### **Recommendation 1**

The Joint Select Committee on Road Safety should recommend that the Australian Government take immediate action to extend ATSB safety investigations to heavy vehicle crashes.

## **5. Rest areas and safer roads**

### **Rest areas**

Truck rest areas enable drivers to rest so they are more alert and safer when driving.<sup>4</sup>

Austrroads released new truck rest area guidelines in January 2019. The guidelines specify that:

- detailed heavy vehicle rest areas strategies should be developed for major highways and significant freight routes
- class 1 and 2 rest areas should be 70-100 kilometres apart; class 3 and 4 rest areas should be 35-50 kilometres apart, and class 5 rest areas should be 15-25 kilometres apart.

The guidelines also set out detailed considerations for the services that should be provided at each class of rest area.

Despite this sensible approach, the rest area guidelines are not linked to funding decisions. There is no requirement for Australian Government infrastructure funding to require the construction of rest areas when funding the planning, design and delivery of road and corridor infrastructure upgrades. ATA and NatRoad submit that transport ministers should agree as soon as possible that the Austrroads guidance on this subject should be mandated in new and upgraded road funding proposals.

---

<sup>4</sup> Austrroads, [Guidelines for the provision of heavy vehicle rest area facilities](#), 2019, 7.

## Recommendation 2

The Australian Government should require all infrastructure funding projects to apply the Austroads rest area guidelines to the planning, design and delivery of road infrastructure.

### Safer roads

The road condition is a causation factor in about 30 per cent of all crashes and is a factor in the severity of 100 per cent of crashes.<sup>5</sup>

The Australian Government invests in roads under the *National Land Transport Act 2014*; however, safety is not a specific object of the Act.

Similarly, safety is not sufficiently prioritised in road spending. In its 2019 infrastructure audit, Infrastructure Australia called for:

- the identification, assessment and prioritisation of upgrades to high-risk sections of the transport network
- safety improvements to high-risk regional roads across Australia as a high priority initiative.<sup>6</sup>

Infrastructure and Transport Ministers are currently developing the National Service Level Standards Framework for Roads as part of the ongoing work for the Heavy Vehicle Road Reform (HVRR) process. The development of this framework currently includes metrics for measuring the safety of road corridors including:

- measuring the number of fatal and serious injuries
- provision and access to rest areas
- safety of the road design
- provision of safe overtaking lanes and distances for overtaking.

It is critical that this framework is finalised and implemented, utilised to prioritise road funding decisions and transitioned to a mandatory minimum level of service.

Additionally, the quality and safety of rural and remote roads can be very poor and dangerous. The NT Road Transport Association, an ATA member association, reports that poor road infrastructure quality is a significant safety concern for trucking companies.

The following images illustrates the challenge of remote road infrastructure, including narrow and washed-out roads.

---

<sup>5</sup> Austroads, [Road geometry for improved rural safety](#). Report AP-T295-15, 2015. 1.

<sup>6</sup> Infrastructure Australia, [An assessment of Australia's future infrastructure needs: the Australian infrastructure audit 2019](#). June 2019. 310-311.

**Figure 1: Remote road safety challenges for trucking operators**



Source: NTRTA

### **Recommendation 3**

The *National Land Transport Act 2014* should be amended to include safety as a focus.

### **Recommendation 4**

The Australian Government should change its approach to funding road projects to:

- require project assessments to use the willingness to pay approach in valuing the lives saved and injuries avoided from safety improvements
- prioritise funding for projects aimed at minimising road safety risks
- prioritise funding for projects which address infrastructure gaps identified by the National Service Level Standards Framework
- require the adoption of safe system principles for project design
- specifically target funding for upgrading unsafe remote and rural roads.

## **6. Other safety measures**

### **Conran review**

The Conran regulatory impact assessment reforms should be extended to the Commonwealth. At present, these reforms apply only to ministerial council and national standard setting body regulatory impact assessments.<sup>7</sup>

Adopting the Conran reforms would address a serious issue with the Commonwealth RIS process. At present, agencies are required to recommend the option with the highest BCR. But the option with the highest BCR may not be the option that saves the greatest number of lives/prevents the greatest number of serious injuries, as the ATA has shown.<sup>8</sup>

### **Recommendation 5**

The Conran regulatory impact assessment reforms should be extended to the Commonwealth, to allow agencies to select the option which saves the greatest number of lives/prevents the greatest number of serious injuries.

<sup>7</sup> Department of the Prime Minister and Cabinet, [Revised guidance on regulatory impact analysis for ministerial forums and national standard setting bodies](#). Viewed 23 June 2021.

<sup>8</sup> ATA, [Improving the stability and control of heavy vehicles](#). February 2018.

## Post-crash care

Enhanced post-crash response is an important way to improve road safety in remote areas.<sup>9</sup>

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 Royal Flying Doctor Service (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.<sup>10</sup>

WRF and the NTRTA have their own submission and recommendations to this inquiry.<sup>11</sup> **The ATA and NatRoad strongly encourage the committee to consider the WRF/NTRTA recommendations to:**

- consider including an additional method of reducing post-accident response times, by training truck drivers and other frequent travellers in remote in the NT/WA pilot training program for first responders
- consider providing incentives for remote area transport operators to install two-way messaging via the Iridium network option, as set out in the WRF/NTRTA submission.

## Sharing the road safely with heavy vehicles

Improving the interactions between heavy vehicles and other road users is critical to improve road safety. Other road users often fail to give trucks enough space and do not consider the additional blind spot and stopping distances for heavy vehicles. This reinforces the point made earlier about the need to focus on the quality of roads. In the words of one NatRoad member: “The better the roads, the safer the interaction.”

The Australian Government should:

- provide information about sharing the road safely with heavy vehicles through its safety programs
- continue funding the Heavy Vehicle Safety Initiatives program, with a view to the continued funding of sharing the road safely programs.

---

<sup>9</sup> Office of Road Safety, [Remote road safety](#). Fact sheet.

<sup>10</sup> [Industry shines light on remote transport 'hidden tragedy'](#), ATN, 22 July 2019.

<sup>11</sup> Submission 20 to the inquiry into road safety.

States and territories should provide information about sharing the road safely with heavy vehicles through driver education programs and licensing testing. We note in this context that the Government has accepted recommendation 20 of this committee's prior report entitled *Improving Road Safety in Australia*.<sup>12</sup> This recommendation is that:

The committee recommends that the Australian Government support future driver education campaigns with an emphasis on the development and demonstration of safe driving attitudes that address the following topics:

- road sharing and pedestrian, motorcycle, bicycle and heavy vehicle awareness;
- safe driving in different environments, with an emphasis on regional and rural roads; and
- the dangers of distracted driving and the need to remain alert to the driving task.

NatRoad has publicly supported this recommendation.<sup>13</sup>

The ATA runs the SafeT360 program – a road safety exhibition which educates young road users on how to share the road safely with heavy vehicles. SafeT360 is backed by research and puts young road users in the driver's seat to experience real-life road events through immersive virtual reality technology. Installation of real truck seats within the exhibition support the hands-on learning experience. This provides the hands-on experience and knowledge that is not offered by learner driver programs.

## 7. Submission contact

Samuel Marks	ATA	Transport and Infrastructure Adviser	<a href="mailto:samuel.marks@truck.net.au">samuel.marks@truck.net.au</a>
Richard Calver	NatRoad	Adviser, Compliance and Workplace Relations	<a href="mailto:richard.calver@natroad.com.au">richard.calver@natroad.com.au</a>

---

<sup>12</sup> Joint Select Committee on Road Safety, October 2020. [Improving Road Safety in Australia](#). 114.

<sup>13</sup> NatRoad, 3 September 2021. [NatRoad calls for on-road culture change following latest safety report](#).