

RAC response to the Australian Senate Inquiry into Aspects of Road Safety



For the better

Introduction

RAC has a long and proud history as an active advocate for road safety in Western Australia (WA) and we thank the Senate Standing Committee on Rural and Regional Affairs and Transport References (Committee) for the opportunity to provide this submission on Aspects of Road Safety.

At a number of points in the past 25 years, WA's fatality rate¹ was better than the national rate. Today, many Western Australian lives are needlessly lost each year because WA's fatality rate, which was once the best State when it comes to its road safety record, is now the worst. This situation is unacceptable. All States are equally capable of, and should be held accountable for, achieving a continuing and significant reduction in the number of people killed and seriously injured on our roads. It follows that if we are to achieve "vision zero" where no lives are lost on Australian roads, the Federal Government must take the lead on bolder and more decisive road safety regulation and policy. In essence, State and Federal governments need to do more.

RAC, a member organisation, represents the interests of more than 800,000 Western Australians and is a leading advocate on the mobility issues and challenges facing our State. Drawing on our heritage, a primary role for the RAC is to act as a voice for our members and to be a strong public advocate about the road safety issues that affect WA.

RAC collaborates with Government and other organisations to ensure safe, accessible and sustainable mobility options are available for our members and the community. Aligned with the themes of safety, accessibility and sustainability, the RAC is an active participant in the WA Road Safety Council, as a representative of all road users.

RAC aligns its activities with the following three themes:

- *Safety* – A safe mobility system can be defined as a system that outperforms national and international safety benchmarks. It encompasses safer drivers in safer cars on safer roads.
- *Accessibility* – To have a cost efficient, convenient and reliable commuter network is an essential part of personal mobility.
- *Sustainability* – Sustainable mobility is broader than the environmental aspects of mobility: it encompasses the mobility needs of current and future generations.

Our submission has been structured according to the Committee's terms of reference:

- a. Road-related injury and death;
- b. Vehicle design standards;
- c. New technologies and advancements in vehicle design and road safety;
- d. Road safety in urban, regional and rural areas; and
- e. Road safety funding.

¹ Expressed in terms of fatalities per 100,000 persons

a. Road-related injury and fatalities in Western Australia

Background

Safe Road Use, Safe Roads and Roadsides, Safe Vehicles and Safe Speeds are the four cornerstones of the Safe Systems approach to road safety. Safe Systems is the foundation of *Towards Zero*, WA's Road Safety Strategy. If fully implemented, *Towards Zero*, which has been adopted by successive WA State Governments, and to which the RAC is a signatory, could see up to 11,000 fewer people killed or seriously injured on Western Australian roads between 2008 and 2020, a reduction of up to 40 per cent on the average number of people killed and seriously injured. The cost savings to WA's health services, business and community would be enormous, at around \$6.6 billion.

Crash statistics

As discussed, in recent decades, WA has not succeeded in progressing the programs and initiatives that will help keep road users safe as effectively as most other Australian jurisdictions. At certain points over the last two or so decades, WA has had a fatality rate² better than the national rate, yet it is currently higher and has been since mid-2002. WA, which was once the best State when it comes to its road safety record, is now the worst.

Figure one shows the WA and National fatality rate since 1990. While the trend downwards in fatality rates has occurred both nationally and in WA, the WA fatality rate has some distinctly different features.

At the end of 2014, the national fatality rate was 5.0, while WA was 7.2. If WA shared the national fatality rate, an additional 56 lives would have been saved. The gap between WA and the national road safety leaders, such as Victoria, is even greater. If WA had the 2014 Victorian fatality rate (4.3), 74 fewer lives would be lost.

² Expressed in terms of fatalities per 100,000 persons

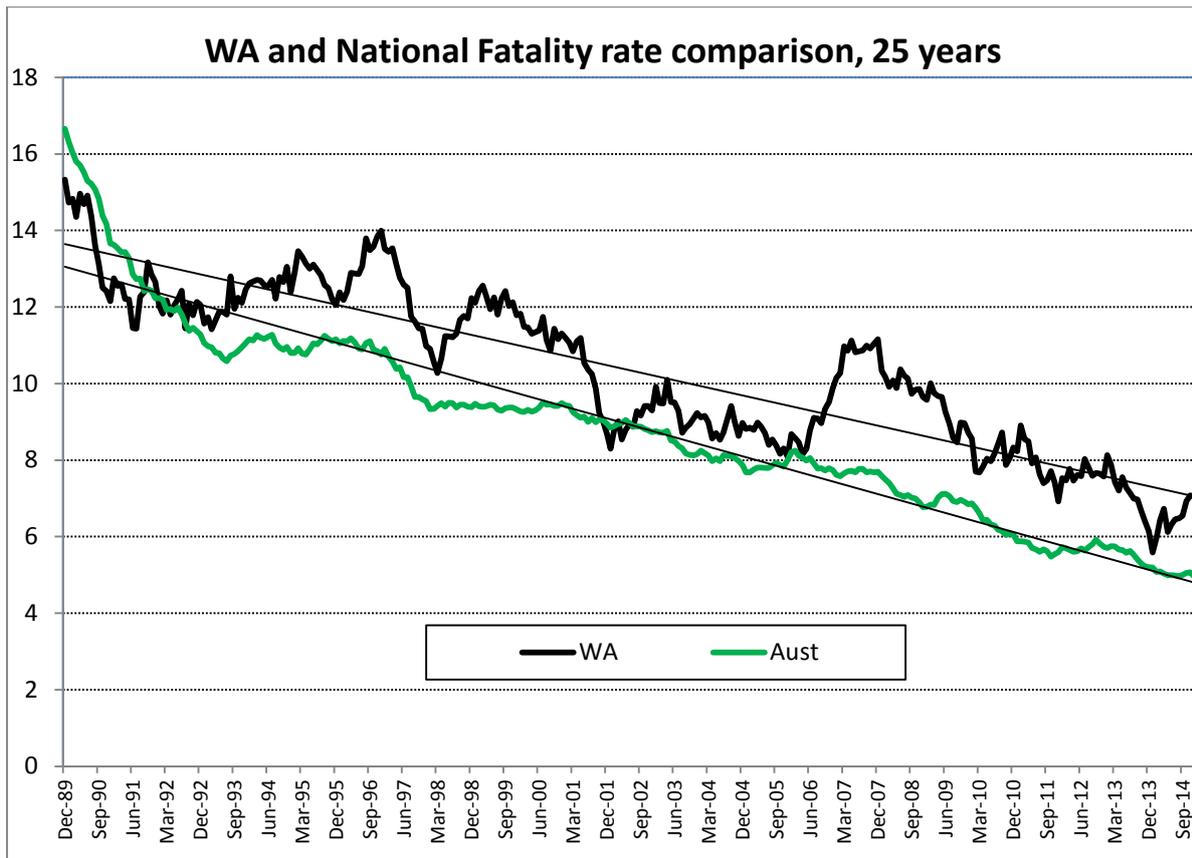


Figure 1 Western Australian and National Fatality Rate Comparison over a 25 year period

One of the relevant features of fatalities is the geographic distribution of crashes, 56 per cent of fatalities occurred outside the Greater Perth area, despite only 22 per cent of the population residing there. The fatality rate in Greater Perth is approximately 4.4 whilst the fatality rate for the population outside Greater Perth is approximately 20.³

RAC analysis indicates that fatality rates are inconsistently distributed between rural and remote areas. For instance, the highest fatality rates occur in Wheatbelt (rural), the Wheatbelt rate being almost triple the rate in the Kimberley (remote) and four times the rate in Pilbara (remote). Last year, fatal crashes in WA were dominated by single vehicle run off road type crashes. Across the whole state 62 per cent⁴ of fatalities occurred in crashes of this type, and the rate was higher in Regional WA (72 per cent) than in metropolitan Perth (48 per cent).

In 2014, vulnerable road users dominated in metropolitan Perth, 60 per cent of fatalities were in these vulnerable road user groups, that is, motorcyclists, pedestrians and cyclists. Motorcycle riders in particular, are a cause for serious concern. This group accounted for a third of fatalities in metropolitan Perth and in 17 per cent of fatalities in regional WA, substantially above their share of licensed motorised vehicles (approximately 5.5 per cent). The disproportionate involvement of motorcycles is even more marked when the relatively low kilometres travelled by motorcycles is considered.

³ Preliminary calculations, subject to change.

⁴ Pedestrian crashes have been excluded from this analysis.

This Inquiry is an opportunity to understand and appreciate that too many Western Australians are needlessly losing their lives. Strong action is required from both State and Federal Governments to counter this.

b. Vehicle design standards

As noted, Safe Vehicles is one of the four cornerstones of *Towards Zero*, WA's Road Safety Strategy which, over the life of the Strategy from 2008 and 2020, will account for more than a quarter of the projected injury savings. Vehicle design standards are a critical road safety strategy aimed at both encouraging the development of safer and more efficient vehicle technologies and, by setting minimum standards, assuring the safety credentials of imported vehicles. A majority of the nation's vehicles are now imported from international markets and as such, Australia's vehicle design standards in the form of Australian Design Rules (ADRs) perform a vital regulatory function.

The process for setting standards must be flexible and dynamic enough to accommodate and encourage rapid technical change and strategic enough to progressively facilitate a lifting of the baseline vehicle safety standards and ultimately vehicle safety features over time. However, the time currently taken to examine new regulatory proposals and implement them as ADRs remains far too protracted.

The result is that Australian road users are not receiving the full benefit of already existing safer vehicle technology which is widely accessible in other international markets. The Federal Government must take action to ensure ADRs are updated more effectively and efficiently than it currently occurs. The sooner new safety technologies are brought into the Australian market, the sooner the road safety benefits of technology can be realised.

An example of the ADRs' poor rate of responsiveness is the current guidelines for Specialist and Enthusiast Vehicles (SEV). In a recent submission by the Australian Automotive Association (AAA) in consultation with RAC, it was highlighted that the current eligibility requirements can and have allowed large-scale importation of particular vehicle models which do not meet vehicle standards, such as the London taxi. One of the four criteria for eligibility as a SEV, is that the vehicle be featured in specialist publications. These days it is relatively easy to create feature articles in digital or print media that would facilitate a vehicle model's eligibility. In a supplementary response to the Government's Review of the *Motor Vehicle Standards Act 1989*, it was recommended that an annual cap on the number of vehicles of a particular model, or the number of vehicles per individual per year that is imported be imposed to prevent future occurrences which relegate safety standards.

To some extent the role of, and lag in updating, the ADRs is supplemented by the Australasian New Car Assessment Program (ANCAP) and to a lesser extent the Used Car Safety Ratings (UCSR) program. ANCAP is an independent vehicle safety advocate which crash tests and rates new vehicles to provide consumers with transparent advice on vehicle safety. According to ANCAP vehicle occupants have twice the chance of being killed or seriously injured in a vehicle rated 1 star compared to a 5 star rated vehicle.

Both ANCAP and UCSR are supported with funding from RAC and the Australian Government as well as a range of other stakeholders. ANCAP encourages vehicle manufacturers to incorporate safety features into new car design and educates consumers to prioritise safety when they are purchasing a

new car. To demonstrate RAC's own commitment to vehicle safety, we will not insure or finance any 2012 and beyond manufactured vehicles which have not been rated by ANCAP or do not achieve safety ratings of 4 or 5 stars.

ANCAP currently publishes star safety ratings online. However, vehicles safety ratings are not always visible on cars at the point of sale, and as such, consumers do not have easy access to vital safety information when purchasing their new car.

Consumer goods such as refrigerators and washing machines are already required to display energy consumption labels at the point of sale. Even cars are legally required to display fuel consumption and emissions information at the point of sale. Yet, in what would be a low-cost measure, there is no mandatory requirement for vehicle safety ratings to be disclosed on new cars at the point of sale.

In a move RAC considers does not go far enough, the WA Government recently announced that 5-Star Safety Ratings would be displayed, on a voluntary basis, at some dealerships. To ensure consumers have access to the vehicle safety information which might one day save their life, the Federal Government must move to make the display of ANCAP star ratings at the point of sale mandatory across all Australian States.

In acknowledging the significant national role of ANCAP in boosting vehicle safety credentials, there is a need to increase funding to enable ANCAP to operate more effectively including through the delivery of a greater number of vehicles tested and increased opportunities for international coordination. Currently, ANCAP is funded from a range of disparate sources within both the public and private sector. The Federal Government plays a vital and welcome role in supporting ANCAP but a consolidation of funding sources, as well as more funding support, is needed to enhance the deliverability of the program.

c. New technologies and advancements in vehicle design and road safety

One of the more significant issues on the safety and mobility horizon is the progression towards Intelligent Transport Systems (ITS) particularly, autonomous vehicle technology. ITS is a collective term for a broad range of information and communications technology solutions (integrated into road infrastructure, vehicles and public transport networks) to help reduce congestion, improve mobility, save lives and optimise the value of existing infrastructure.

From a safety perspective ITS has the potential to fundamentally change the road safety landscape, thought to be responsible for "as close to Vision Zero and Safe System" as can reasonably be achieved"⁵. However, insufficient funding will be an impediment to the successful roll-out and use of road network technologies in WA and RAC has identified the timely provision of funding for Road Network Management Technologies as one of its "top-five" federal priorities in the AAA's Pre-Budget Submission.

A survey of public opinion about autonomous vehicles in Australia, the United Kingdom (UK) and the United States (US) found that Australians were least likely to have heard about autonomous and self-driving vehicles (39 per cent, compared to 34 per cent UK, and 29.1 per cent in the US) but that

⁵ Hillier, P., Wright, B., and Damen. P., (2015), *Readiness for Self-Driving Vehicles in Australia*, ARRB Group Ltd, Vermont South, Victoria, Australia.

Australians are the most positive about autonomous and self-driving vehicles (61.9 per cent, compared to 56.3 per cent in the US, and 52.2 per cent in the UK)⁶.

The development of ITS will demand leadership from the Federal Government in relation to funding and coordinating the national framework needed to support the successful rollout of ITS. This includes inter-operability standards of both vehicles and infrastructure and building effective relationships across all levels of government, vehicle manufacturers, technology and information suppliers, road user representatives and a host of other stakeholder groups. The Federal Government must be responsive and timely to this need, as ITS technologies are already within the Australian vehicle fleet and more will flow quickly as they gain market acceptance.

It is important to note ITS and the movement toward autonomous vehicles offer most promise in infrastructure and vehicle-rich environments. The low density infrastructure and vehicle environments of rural and remote WA may therefore gain relatively fewer benefits. With this in mind it is critical to ensure that there is appropriate investment and strategies in place to target rural and remote populations. This should ensure that the disadvantaged communities in road safety terms do not become further marginalised by a growing focus on ITS and autonomous vehicles.

d. Road safety in urban, regional and rural areas

The road safety response in rural and remote environments poses a unique set of challenges. In WA, fatal crashes in regional areas are dominated by single vehicle run off road crashes and are distributed across a large network and on a relatively high proportion of lower volume roads.

Black spot treatments are one way to address identified problem locations and such project are supported with funding through both the State and Federal Government Blackspot Programs. Both programs have yielded good results, however the funding WA receives compared to other states has been disproportionate. An ongoing RAC study examining road safety measures in WA and Victoria specifically, found that in 2009/2010, Victoria received \$27.2 million in Black Spot funding compared to \$13.1 million in WA. Given that the two states have similar lengths of State managed and Local Government managed roads, the disparity in funding levels inversely reflect the rate of fatality and serious injuries in the two states.

Whilst targeting Black Spot is one way of addressing road safety issues, an alternate approach is to assess the collective risk or exposure by undertaking a structured multi-criteria assessment of existing road environments. RAC partners with other Australian Automobile Clubs and the Australian Government to star rate the National Highway Network and key State roads through the Australian Road Assessment Program (AusRAP) program.

Safe roads with design elements such as dual lane divided carriageways, good line marking and wide lanes have a higher star rating. Lower-rated roads are likely to have single-lanes and be undivided with poor line marking and hazards such as trees, poles and steep embankments close to the edge of the road.

⁶ Transportation Research Institute, (2014), *A survey of public opinion about autonomous and self-driving vehicles in the US, the UK and Australia*, University of Michigan, Report No. UMTRI-2014-21

In 2013, the Star Rating process covered 4,671 kilometres of WA's National Highways. Five per cent of the network was rated as 1-star and 22 per cent was rated as 2-star. The majority (57 per cent) of road links in the State were rated as 3-star and 16 per cent were rated as 4-star. No highways were rated as 5-star.

A Safer Roads Investment Plan which was developed for WA identifies that with the implementation of selected road safety treatments, WA would save approximately 4,150 lives and serious injuries. If fully implemented, this would cost almost \$450 million with a high benefit-cost ratio of 4.18. Fully implementing the Investment Plan would reduce the proportion of 1-star rated roads from five per cent to one per cent. Two-star rated roads would decrease from 22 per cent to 14 per cent. The proportion of 3-star (66 per cent) and 4-star (19 per cent) roads would increase to 85 per cent.

It is an alarming revelation and significant risk to the road users of WA that 27 per cent of WA's National Highway Network recorded an AusRAP star rating of just one or two stars and an immediate and appropriate funding commitment is required from the Australian Government to address the area-wide implementation of treatments such as roadside barriers, audible edge lines and seal shoulders.

The report, *Star Rating Australia's National Network of Highways* is attached to this submission.

e. Road safety funding

In 2009, the Western Australian Auditor General identified that WA was facing an \$800 million maintenance backlog and it is widely recognised that across the State, the condition of the regional road network is in decline. Narrow seal, poor surface condition and hazardous roadsides are common complaints from regional road users. The 2014 RAC Risky Roads campaign also received more than 5,000 nominations from across the State highlighting the poor condition of metropolitan and regional roads.

Under the existing system road users pay for access to roads by delivering revenue to governments through a number of State and Federal taxes or charges. State Governments acquire revenue by imposing an access charge on vehicle owners in the form of vehicle registration. Other forms of revenue State Governments derive from motorists include stamp duty and license fees. These charges vary across jurisdictions.

The Federal Government acquires revenue from motorists predominately by imposing an excise tax on fuel and motorists therefore make a significant contribution to the Federal Government's revenue base. However, only a portion of this revenue flows back into public spending on transport infrastructure and currently there is no link between the taxes motorists pay and public investment in transport infrastructure. The fuel excise revenue the Federal Government receives from road users is not earmarked for expenditure on the transport network and instead flows through to consolidated revenue, where the process of directing funding to land transport is lacking in transparency.

RAC has documented⁷ the payment of taxation by motorists and expenditure on roads by the State and Federal Governments. The 2014 Review found that, on top of fees and charges on motorists by the State Government, the Commonwealth Government collected approximately \$2.3 billion from motor vehicle related taxes but returned just 41 cents in every dollar to the State for spending on WA roads. Conversely, the Western Australian State Government spends more on transport than it collects through road user charges such as registration fees. To ease the burden of transport funding on the State, a greater portion of the Federal Government's motoring-related revenue should be dedicated to improving WA's road network.

The report, *Motorist Taxation Revenue and Road Spending Review* is also attached to this submission.

Conclusion

The contributions made by the Federal government to road safety programs in WA are welcomed, however our road fatality rate, the worst of any State in Australia, is a tragic indicator that action on road safety is urgently needed and Western Australians need assurance that Government is doing all that can be done to and bring WA into line with other states.

The Federal Government must signal its commitment to the essential programs and projects which will help keep Australian road users safe. Having passed the half way mark into the State's 12 year road safety strategy, *Towards Zero*, WA is behind on its target to reduce death and serious injuries by 40 per cent by 2020. With just over five years left, action must be taken now, with renewed and increased focus on the following:

- The time taken to examine new regulatory proposals and implement these as ADRs is too protracted. The result is that Australian road users are not receiving the full benefit of safer vehicle technology which is not only in existence, but widely available in other, international, markets. The Federal Government must take action to ensure ADRs are updated more effectively and efficiently.
- To ensure consumers have access to the vehicle safety information which might one day save their life, the Federal Government must move to make the display of ANCAP star ratings at the point of sale mandatory across all Australian States.
- According to ANCAP vehicle occupants have twice the chance of being killed or seriously injured in a vehicle rated 1 star compared to a 5 star rated vehicle. Currently, ANCAP is funded from a range of disparate sources within both the public and private sector. The Federal Government plays a vital and welcome role in supporting ANCAP but a consolidation of funding sources, as well as more funding support, is needed to enhance the deliverability of the program.

⁷ ACIL Allen Consulting, (2014), *Report to RAC WA: Motorist Taxation Revenue and Road Spending*, http://rac.com.au/cs/idcplg?IdcService=GET_FILE&dDocName=racstg057926&allowInterrupt=1&RevisionSelectionMethod=LatestReleased&noSaveAs=1

- From a safety perspective ITS have the potential to fundamentally change the road safety landscape, thought to be responsible for “as close to Vision Zero and Safe System” as can reasonably be achieved. However, insufficient funding will be an impediment to the successful roll-out and use of road network technologies in WA. The development of ITS will demand leadership from the Federal Government in relation to funding and coordinating the national framework needed to support the successful rollout of ITS.
- It is an alarming revelation and significant and risk to the road users of WA that 27 per cent of WA’s National Highway Network recorded an AusRAP star rating of just one or two stars and an immediate and appropriate funding commitment is required from the Federal Government to address the area-wide implementation of treatments such as roadside barriers, audible edge lines and seal shoulders.
- The Federal Government collected approximately \$2.3 billion from motor vehicle related taxes but returns just 41 cents in every dollar to the State for spending on WA roads. To ease the burden of transport funding on the State, a greater portion of the Federal Government’s motoring-related revenue should be dedicated to improving WA’s road network.

In support of our submission we also attach the following:

- *Review of the Motor Vehicle Standards Act 1989 -Submission by the Australian Automobile Association*
- *Star Rating Australia’s National Network of Highways*
- *2015-16 pre-budget submission- Submission by the Australian Automobile Association.*
- *Motorist Taxation Revenue and Road Spending Review.*