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South Australia's Road Safety Strategy to 2031
Via email: DIT.RoadSafety@sa.gov.au

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Dear Sir/Madam,

Re: South Australia's Road Safety Strategy to 2031

As the leading advocate for surgical standards, professionalism in surgery and surgical education in Australia and New Zealand, the Royal Australasian College of Surgeons (RACS) is committed to taking informed and principled positions on issues of public health at both state and federal levels.

RACS has long recognised that road trauma is a serious public health problem of epidemic proportions. Many Fellows of the College see the effects of road safety issues on a regular basis and in the case of trauma surgeons, almost daily. In the 1960s surgeons identified that they could be influential in this area with policy makers and legislators. RACS has been a major contributor and advocate for mandatory seatbelt wearing (1970s), drink driving countermeasures and the compulsory wearing of helmets by cyclists (1980s to 1990s).

RACS acknowledges the ongoing efforts of the South Australian Government to improve the safety of our roads, which have resulted in significant reductions in road injuries and deaths over successive decades. Sadly, in recent years progress has plateaued and in 2019 South Australia recorded its worst year on the roads in almost a decade. ⁱ

The 2020-2031 Road Safety Strategy represents a pivotal moment for South Australia. We cannot afford to allow the progress of recent decades to stagnate or to go backwards. It is critical that the new strategy sets ambitious targets and dedicates the necessary resources to achieving them.

The Safe Systems approach and achieving 'Vision Zero'

At its core, Vision Zero starts with the ethical belief that everyone has the right to move safely in their communities, and that system designers and policy makers share the responsibility to ensure safe systems for travel. Importantly, it recognises that people will sometimes make mistakes, so the road system and related policies should be designed to ensure those inevitable mistakes do not result in severe injuries or fatalities. It takes a safe systems approach, which recognises this human frailty and puts in layers of protection in the form of safe speeds, safe roads, safe vehicles, and safe people. ⁱⁱ

In 2018 a Review of the National Road Safety Strategy (NRSS) Set a target of zero Australian road deaths for Australia by 2050, with an interim target of zero deaths for all major capital city CBD areas, and high-volume highways by 2030ⁱⁱⁱ. While Vision Zero may seem an ambitious and even an unattainable target, cities around the world are demonstrating that the likelihood of achieving this is becoming increasingly possible.

As an example, in 2019 the Norwegian Capital of Oslo achieved the feat of zero fatalities for cyclists, pedestrians or children. Across the entire Oslo



region there was only one road fatality when a motorist crashed into a fence in an accident that did not involve any other road users.^{iv}

According to city officials and road safety experts, the city implemented a range of measures to improve safety. These included lowering speeds, significant investment in infrastructure, a mix of policies that specifically targeted separating different road groups as much as possible. This was backed by a national policy that demanded significantly improved vehicle standards. Norwegian officials particularly highlighted that the success was largely due to a consistent and intense focus on road safety by successive Governments, regardless of their political persuasion.^v

There are some obvious differences between Adelaide and Oslo, such as Adelaide's larger geographical area and arterial road network. However, there are also many similarities^{vi} including similar population sizes, standards of living and capacity of Government's to fund and invest in infrastructure projects.

The South Australian Government is to be commended for the way in which it has responded to the challenges posed by the Covid-19 pandemic, and the leadership it has demonstrated. A similar response is required to the epidemic that is road trauma. Eliminating road deaths and serious injuries will not be realised unless there is a long-term commitment to achieving it which is supported by the investment and level of resources required, and therefore a 'Vision Zero' target must be at the heart of the strategy.

Safe Roads

RACS encourages a holistic approach to road maintenance and improvement programs. Any strategy to improve road conditions must include road quality, visibility, driver distraction, safety barriers, emergency stopping areas, rest areas and any other aspects that may impact on safe driving.

Regional Roads

Earlier this year the RAA released its third [Risky Road Survey](#). A notable finding in this report was that rural and regional roads accounted for ten of South Australia's fifteen worst roads. Poor road maintenance was the major cause for concern on almost all the nominated roads, with uneven surfaces, crumbling road edges, potholes and a lack of overtaking opportunities also commonly cited as key safety issues.^{vii}

According to the Australian Road Assessment Program (AusRAP) approximately 37 per cent of South Australia's road network was rated as one to two-star quality when they were last rated in 2013.^{viii} While there have been some infrastructure upgrades since the AusRAP ratings were released, the RAA findings would indicate that there is still much more work to do.

A key action in the National Road Safety Action Plan 2018-2020 was that Governments; collectively aim to improve the star ratings across the whole road network, with the aim to achieve 3-star AusRAP ratings or better for 80 per cent of travel on state roads, including a minimum of 90 per cent of travel on national highways.^{ix} RACS urges the South Australian Government to prioritise this action, and we cite the below example from the recent Review of the NRSS as an example of the significant potential benefits that can be achieved by committing to this action.

The Cooroy to Curra section of Queensland's Bruce Highway used to be one of the deadliest stretches in the country. It is now one of the safest, moving from a 2-star safety rating to 4 and 5-star following a state and Australian Government funded upgrade. Road infrastructure improvements have enhanced safety and efficiency on this important transit and freight corridor, with long distance traffic now separated from the locals. The project has delivered both safety and efficiency outcomes: the speed limit has been raised to 110km an hour and an 82% reduction in

fatal and serious injuries was achieved in the three years after opening when compared to the Old Bruce Highway before 2010.^x

Metropolitan roads

Separation is essential to ensure the safety of our most vulnerable road users, particularly pedestrians and cyclists. Statistics show that the highest levels of crashes involving these types of vulnerable road users occur in metropolitan Adelaide, largely due to the higher volumes of both pedestrians and cyclists in these areas.

Increases in our population will only exacerbate this vulnerability, as people seek alternative, inexpensive and efficient forms of transport, while seeking to improve their health and wellbeing. Where separation is not feasible, it is vital that efforts are made to control the speed environment. Roadway design is an important factor that must be carefully considered to maximise the safety of all road users.

Safe Speeds

As speed goes up people die, and as speed goes down people live. Although there is a very robust evidence base to support this, and numerous 'confronting' public education campaigns, unfortunately it is still a very hard public sell.

RACS supports appropriate speed limits when there are people about, particularly school zones and we applaud the South Australian Government for taking a leadership role and being the only Australian Government to implement speeds as low as 25-kilometres per hour. Many South Australian Councils have introduced 40 kilometres per hour speed limits in side streets, which have proven effective in reducing road trauma^{xi}. RACS encourages the State Government to work with Councils to extend this policy across all Council areas.

The College also supports the 30-kilometre speed limits being trialled in Hindley Street West, which services a large pedestrian population with its high student and visitor population during the day and is one of Adelaide's busiest night precincts. If, as expected, this trial results in safer environment for road users, we encourage the South Australian Governments to consider further rollouts of restricted speeds across targeted areas of the CBD area.

Point-to-point speed enforcement

Point-to-point speed cameras involve measuring the average speed of vehicles over long distances and are an effective way of encouraging safe driving speeds. This is particularly relevant in the South Australian context given the long stretches of isolated roads, and the difficulties involved in enforcing safe speed limits in these areas. Point-to-point enforcement promotes area-wide suppression of speeding because speed enforcement is sustained over a length of road rather than just a single spot.

The College believes that this proven technology is significantly underutilised. Research conducted in Europe has shown a 33 – 85 per cent reduction in fatal and serious crashes after point to-point enforcement was installed^{xii}. Furthermore, the NRSS states that point-to-point speed enforcement has a high level of public support. It has been described as fairer than spot speed enforcement because speeding is detected over a greater distance, demonstrating the behaviour may be intentional and not due to a momentary lapse of concentration.^{xiii} This infrastructure should encompass major whole of road corridor, not just black spots.

Safe Drivers

Driver distraction (any activity that could divert a person's attention away from the primary task of driving or walking safely) is a serious and growing challenge to road safety, and it is increasingly emerging as a factor in fatal road accidents over the past decade. While laws targeting mobile phone use while driving can act as a deterrent, as evidenced by the last decade, technological innovation and advancement can be rapid. As an example, many devices, such as smart watches, can now operate independently of a phone so send and receive messages, make phone calls or check other Apps. These are just as distracting and dangerous as mobile phone use. It is important that the new strategy recognises the importance of a strong regulatory system that is adaptive and agile enough to keep pace with the rapidly changing technological landscape.

A strong signal is needed to raise the awareness of the danger of distraction on roads. The real effect and implications of road trauma and serious injury could be more comprehensively understood through collection of relevant data. This data is crucial in determining the effectiveness of implemented programs and developing appropriate policies. (see below for more information on data collection and linkages).

RACS also sees opportunity to lead the change in acceptable blood alcohol content (BAC) limits for all road user groups with a strong view to reducing road trauma and serious injury statistics. As an example, motorcyclists are constantly over-represented in road statistics. Research shows increasing BAC increases the risk of motorcycle crash, injury and fatality rates, with riders at 0.05 per cent BAC having 165 times the fatal crash risk than a car or van driver at the same BAC level.^{xiv}

As well as setting and maintaining appropriate penalties for dangerous driving behaviours, the Government should consider an appropriate rewards system for drivers who do not receive demerit points or fines for a given period. The cost of registration and licence renewal is increasing and is often a source of frustration for many people. Appropriate discounts on these costs could act as a significant incentive to do the right thing.

Older Drivers

Anecdotally, surgeons have reported a growing proportion of patients involved in motor vehicle crashes admitted to hospital as being drivers over the age of 70. This is supported by statistics from the National Road Safety Action Plan 2018–2020.^{xv}

While elderly road users are not the only vulnerable road user group, this population typically has the added complexity of reduced physiological reserve, frailty, co-morbidities, and therefore reduced baseline health and mobility^{xvi}. These factors are compounded by medications, age related cognitive impairment and potentially unsafe driving environments.

Much of the historic approach to addressing safety for this older group of road users has relied on monitoring of driving performance, and removal of licence when performance falls below a threshold level. Although assessment of fitness to drive will remain an important approach to managing older road user safety^{xvii}, statistics show that the majority of older drivers are safe drivers, and their continued on-road mobility should be encouraged and facilitated. Many older drivers are adept at self-regulating their driving (e.g., daylight hours, lower speeds) to avoid problems.^{xviii}

As the South Australian population ages, a targeted strategy for improving safety for older road users while also maintaining independence is needed. An example of a successful model is the Older Drivers Project, created by the American Medical Association in partnership with the National Highway Traffic Safety Administration.

The Project highlights that too often, the medically at-risk driver is not recognised as such until after a crash, or other on-road incidents has occurred. It would be ideal to detect relevant conditions as they emerge and *before* driving safety may be compromised. The responsibility for action extends more broadly than healthcare providers, and includes older patients themselves, their family, licensing regulators, law enforcement, and other community stakeholders.”^{xix}

The primary objective of this approach involves helping older drivers stay on the road safely to preserve their mobility and independence. It focusses on three main methods; optimising the driver, optimising the driving environment, and optimising the vehicle. In this approach, driving cessation is recommended only after the safety of the driver cannot be secured through any other means^{xx}.

Safe Vehicles

Road accidents involving older vehicles are far more likely to result in death or serious injury. According to the latest figures from the Department of Infrastructure and Planning in 2018, 26 per cent of passenger vehicles in the South Australia fleet were aged 15 plus years, yet 37 per cent of passenger vehicles involved in serious casualty crashes were in that range. The same report found that between 2011 and 2018 the average age of South Australia’s vehicle fleet increased from 10.5 years to 12.3^{xxi}.

Since 1993, Australasian New Car Assessment Program (ANCAP) has published independent safety ratings for thousands of new vehicle makes, models and variants. These independent safety ratings provide a rating of between zero and five stars and are used to compare the relative safety between vehicles of similar size. In 2018 ANCAP provided evidence that 68 per cent of vehicle owners were not aware of the safety rating of their car, including 39 per cent of those who have just purchased a new vehicle^{xxii}. RACS believe that greater information on a vehicle’s ANCAP safety rating should be mandated both at the point of sale and when advertising. In addition to this, RACS believes that the South Australian Government should pursue policies that actively promote the implementation of life-saving technologies in newer vehicles wherever possible and discourages the sale of vehicles that do not meet this criteria.

Data collection and linkages

RACS recently co-signed a [submission to the Senate Joint Select Committee on Road Safety](#). This submission highlighted how the collection and linkage of data throughout the Covid-19 pandemic has greatly assisted Australian Governments in their response to mitigating the virus. Below is an excerpt from this submission.

COVID-19 (has provided) positive lessons and opportunities that have occurred including:

- *precise, consistent, and timely data collection and reporting*
- *cooperation by all levels of government driven by national leadership and coordination*
- *consistent and ongoing public focus driven by all political leaders and senior bureaucrats*
- *success at changing social behaviour and engaging media and other communications channels.*

The submission also contains the following comments and recommendations:

Australia has placed timely data collection, aggregation and reporting at the forefront of its response to the COVID-19 pandemic. We believe there are some fundamental principles which

have guided Australia's COVID-19 data response which should be applied to road safety and embedded in the next National Road Safety Strategy:

- *Governments are unambiguous that the data is essential to respond to the situation.*
- *Governments release data and modelling to the public for transparency.*
- *There is strong communication on the link between the data and decision-making.*
- *The Commonwealth continues to paint and explain an overall picture even if there are gaps*
- *from jurisdictions and does not cease reporting on something because not all data is present.*
- *Government decision-makers keep an open mind to evolving knowledge on the situation – they*
- *admit they don't have all the answers yet and have an expectation that the data will continue to*
- *improve over time to assist with management of the situation.*
- *Transparent reporting means that jurisdictions can be benchmarked, creating an expectation*
- *that they will participate or become a stand-out that must be explained.*

National approach

Each year across Australia more than 1,200 people are killed and 44,000 are hospitalised. ^{xxiii}This can only be described as a national epidemic which demands real leadership and close collaboration from all levels of Government and within our communities.

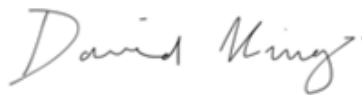
While RACS welcomes this review, many of the solutions to reducing Australia's devastating road toll and creating safer roads have already been identified, and there is a growing sense of frustration at the delays taken to implement proven life-saving initiatives. This was highlighted in the Inquiry into the [National Road Safety Strategy 2011-2020](#), as well as the recently released report in to [Reviving Road Safety Report](#) developed by the Australian Automobile Association (AAA). The Reviving Road Safety report outlines several solutions that can be implemented to deliver better outcomes and significantly improve road safety. RACS endorses this report in full, and we ask that the recommendations from this report, as well as our established position on [Road Trauma Prevention](#) are taken into consideration as part of this review.

Conclusion

In summary, RACS urges the government to take a strong, bipartisan stand to enact new legislation to prevent further deaths and serious injuries on our roads. Vision Zero must be at the heart of South Australia's next road safety strategy and will only be achieved if it is supported the appropriate investment and targeted policies that make vehicles, roads, people and speeds safer. Improved data collection and linkage is also essential in allowing for effective crash analysis and further policy development.

RACS is proud of its history of championing road safety initiatives that saves lives. We are committed and ready to work with the government to implement the changes needed for safer roads.

Yours sincerely,



Mr David King
Chair, RACS SA State Committee



Mr Peter Bautz
Chair, RACS SA Trauma Committee

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- ⁱ South Australia Police, 'Traffic Statistics' <https://www.police.sa.gov.au/about-us/traffic-statistics>, accessed 28 October 2020.
- ⁱⁱ The Vision Zero Network, 'What is Vision Zero' <https://visionzeronetwork.org/about/what-is-vision-zero/> accessed 28 October 2020.
- ⁱⁱⁱ Crozier J. and Woolley, J. 'Inquiry Into the National Road Safety Strategy 2011-2020' *Department of Infrastructure, Transport, Regional Development and Communications* https://www.roadsafety.gov.au/sites/default/files/2019-11/nrss_inquiry_final_report_september_2018_v2.pdf, September 2018
- ^{iv} Hartmann A. and Abel, S. 'How Oslo Achieved Zero Pedestrian and Bicycle Fatalities, and How Others Can Apply What Worked' *WRI Ross Centre*, <https://thecityfix.com/blog/how-oslo-achieved-zero-pedestrian-and-bicycle-fatalities-and-how-others-can-apply-what-worked/>, 13 October 2020.
- ^v *Ibid*
- ^{vi} Infrastructure Australia, 'Australian Cities in an International Context, Chapter 2' p. 16 *Major Cities Unit*, https://www.infrastructure.gov.au/infrastructure/pab/soac/files/SOAC_Chapter_2.pdf, undated, accessed 28 October 2020.
- ^{vii} Royal Automobile Association of South Australia, 'Risky Roads: 2019 Survey Results' available for download from: <https://our.raa.com.au/about-raa/risky-roads>, accessed: 28 October 2020.
- ^{viii} Australian Road Assessment Program, 'Star Rating: Australia's National Network of Highways' p.26, *Department of Infrastructure, Transport, Regional Development and Communications*, 2013.
- ^{ix} Transport and Infrastructure Council, 'National Road Safety Action Plan 2018-2020' p.6, https://www.roadsafety.gov.au/sites/default/files/2019-11/national_road_safety_action_plan_2018_2020.pdf May 2018.
- ^x Crozier J. and Woolley, J. 'Inquiry Into the National Road Safety Strategy 2011-2020' *Department of Infrastructure, Transport, Regional Development and Communications* https://www.roadsafety.gov.au/sites/default/files/2019-11/nrss_inquiry_final_report_september_2018_v2.pdf, September 2018
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- ^{xii} Austroads 'Point-to-point speed enforcement' from: <https://www.onlinepublications.austroads.com.au/> 2012
- ^{xiii} Australian Transport Council, 'National Road Safety Strategy 2011-2020' p.62 https://www.roadsafety.gov.au/sites/default/files/2019-11/nrss_2011_2020.pdf accessed 28 October 2020

^{xiv}Transport and Road Safety Research Centre. Motorcycle Safety in NSW. 2015. From <https://www.parliament.nsw.gov.au/ladocs/submissions/46271/Submission%2022%20-%20Inquiry%20into%20Motorcycle%20Safety%20in%20NSW.PDF> Accessed: 28 October 2020.

^{xv} Transport and Infrastructure Council, 'National Road Safety Action Plan 2018-2020' p.22, https://www.roadsafety.gov.au/sites/default/files/2019-11/national_road_safety_action_plan_2018_2020.pdf May 2018.

^{xvi} *Ibid*

^{xvii} *Ibid*

^{xviii}

^{xix} US Department of Transportation and the American Medical Association 'Physician's Guide to Assessing and Counselling Older Drivers 2nd edition' 2010.

^{xx} Meuser T., et al. 'The American Medical Association Older Driver Curriculum for Health Professionals: Changes in Trainee Confidence, Attitudes & Practice Behavior' From <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3074473/> October 2011.

^{xxi} Department of Planning, Transport and Infrastructure, 'South Australia's Road Safety Strategy Annual Progress Report 2018'

https://dpti.sa.gov.au/_data/assets/pdf_file/0007/613960/South_Australias_Road_Safety_Annual_Report_2018.pdf accessed 28 October 2020

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^{xxiii} Crozier J. and Woolley, J. 'Inquiry Into the National Road Safety Strategy 2011-2020' *Department of Infrastructure, Transport, Regional Development and Communications* https://www.roadsafety.gov.au/sites/default/files/2019-11/nrss_inquiry_final_report_september_2018_v2.pdf, September 2018