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Road Safety Tasmania
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Hon. Rosemary Armitage MLC Chair
Mr Tim Mills Secretary

Dear Rosemary and Tim,

Re: Tasmanian Road Safety Inquiry

As the leading advocate for surgical standards, professionalism in surgery and surgical education in Australia and Aotearoa 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 Tasmanian 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 2020 Tasmania recorded its equal highest number of fatalities on the roads in the last decade, even despite the restricted travel during the initial stages of the Covid-19 pandemic. [i]

The Road Safety Inquiry represents a pivotal moment for Tasmania. We cannot afford to allow the progress of recent decades to stagnate or to go backwards. This is an important opportunity to set a new direction for Tasmania and to reduce the devastating consequences f deaths and serious injuries on our roads.

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 2030[iii]. 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 a crash 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 similarities[vi] between Oslo and Tasmania's larger population centres, such as similar standards of living and capacity of Governments to fund and invest in infrastructure projects. The Tasmanian 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

According to the Australian Road Assessment Program (AusRAP) approximately two-thirds of Tasmania's road network was rated as one to two-star quality when they were last rated in 2013. Following this, a 2016 AusRAP found that Tasmanian Highways made up two of the top five, and three of the top ten worst stretches of Australia's highway network.

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.[vii]

There have been some notable infrastructure upgrades since the AusRAP ratings, and the 2016 report were released. However, as highlighted by the Royal Automobile Club of Tasmania (RACT), on current projections it will be many years before all Tasmanian roads are rated three-stars or higher, well after the 2030 target set by the RACT.

RACS urges the Tasmanian 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.[viii]

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 built up areas, 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 Tasmanian Government and the City of Hobart for their initiative in reducing speed limits to 40km/h across the Hobart CBD. These types of policies have proven effective in reducing road trauma in built up areas across other jurisdictions[ix]. RACS encourages the State Government to work with Councils to extend this policy across other suburban and retail precincts across Tasmania.

Additionally, in a recent submission to the South Australia Government, RACS highlighted that state's leadership in its longstanding state-wide policy of 25km/h in school zones. The College urges the Tasmanian Government to adopt similar policies.

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. 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 should apply to all road users and 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[x]. 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.[xi] 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 crashes 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).

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.

Motorcyclists

Motorcyclists are constantly over-represented in road statistics. Studies suggest that motorcyclists are 30 times more likely to be killed and 41 times more likely to be seriously injured than car occupants per distance travelled. According to this year's figures from the Tasmanian Government, up until 30 June 2021, the number of serious injuries involving motorcyclists was almost equal to the number of serious injuries involving car drivers (47 compared to 48). This is despite motorcyclists accounting for a significantly lower proportion of registered road users.

Riding a motorcycle requires exceptional perception reaction skills to avoid becoming involved in a crash. It is therefore not surprising that the use of alcohol and/or drugs impair riding skills significantly. Studies suggest that consuming even modest amounts of alcohol were associated with significantly increased levels of risk for motorcyclists.

As an example, motorcyclists with a blood alcohol concentration (BAC) of 0.03 have been found to have around three times the (already much higher) fatality risk of sober motorcyclists, and twenty times the fatality risk with a BAC of 0.08. To address this, the College supports lowering the accepted BAC for motorcyclists.

In addition to this recommendation RACS also has existing position paper of Road Trauma Prevention. This paper includes a number of other recommendations in relation to motorcyclists which we ask are taken into consideration as part of this submission.

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.[xii]

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[xiii]. 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[xiv], 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.[xv]

As the Tasmanian 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 have 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."[xvi]

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[xvii].

Safe Vehicles

Enhanced safety features: RACS advocates for the Australian Design Rules to mandate safety features, such as Autonomous Emergency Braking (AEB), on all new vehicles imported into Australia, particularly heavy vehicles. Safety benefits would also result from measures such as the removal of tariffs on all imported vehicles with enhanced safety features including AEB; adoption of fiscal factors encouraging purchase of safer vehicles; subsidised purchase price of contemporary five-star safety-rated vehicles and reduction in registration costs on vehicles incorporating AEB and other contemporary safety technologies.

Road crashes involving older vehicles are far more likely to result in death or serious injury. This is a particularly worrying trend for Tasmania, given that the State has the oldest car fleet in the country. According to figures from the Australian Bureau of Statistics the average age of Tasmanian vehicles is 13.3 years. This is not only well above the national average of 10.6 years but is also an increase from the 2019 Census when the average age was 12.9 years.

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[xviii].

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 Tasmanian 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 these 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.*

Surgeons in Tasmania have highlighted the need for a functioning trauma registry over many years. Partly as a result of this advocacy, the Tasmanian Trauma Registry was commissioned in April 2020 and Tasmanian data is now submitted to the Australian Trauma Registry quarterly. The ATR collects data on severely injured patients presenting to major trauma centres and is critical in analysing trauma trends as well as guiding public policy and resourcing requirements.

At present, the Tasmanian Trauma Registry only captures data for patients admitted to the State's major trauma centre, Royal Hobart Hospital. This means that care of patients presenting to other hospitals following transport injury cannot be readily analysed. This Inquiry presents an opportunity to capitalise on the early successes of the Tasmanian Trauma Registry by committing to recurrent registry funding, as well as expanded staffing to achieve state-wide data capture across Tasmania.

National approach

Each year across Australia more than 1,200 people are killed and 44,000 are hospitalised. [xix]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 Tasmania'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,

Dr Peter Moore (FRACS)

Chair State Committee Tasmania

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