



ROAD TRANSPORT FORUM NEW ZEALAND INC

SUBMISSION ON NZ GOVERNMENT COSULTATION DOCUMENT ON THE 2020-2030 ROAD SAFETY STRATEGY *ROAD TO ZERO* RELEASED BY MINISTRY OF TRANSPORT 17 JULY 2019

Contact: **Kerry Arnold**
Technical Manager
Road Transport Forum NZ
PO Box 1778
Wellington
Ph: (04) 471 8281
Email: kerry@rtf.nz

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Road transport Forum Submission on NZ Government Consultation Document on the 2020-2030 Road Safety Strategy *ROAD TO ZERO* released by Ministry of Transport 17 July 2019

1.0 Representation - Road Transport Forum New Zealand

1.1 Road Transport Forum New Zealand (RTF) is a nationwide organisation representing the road transport industry. RTF provides services to and public policy advocacy for its affiliated members who comprise owner-drivers, fleet operators and international corporates engaged in freight and logistics.

1.2 RTF's Constituent Associations include:

- National Road Carriers (Inc)
- Road Transport Associations NZ (Inc)
- NZ Trucking Association

1.3 RTF's member associations have in excess of 3,000 members and associate members who operate 16-18,000 trucks over 3,500 kg.

1.4 RTF is the authoritative voice of New Zealand's road transport industry which employs 22,600 people (3.0% of the workforce), has a gross annual turnover of \$6 billion and carts over 70% of New Zealand's land-based freight on a tonnes/kilometre basis.

2.0 Introduction

2.1 This submission responds to the Ministry of Transport's *Road To Zero, Consultation on the 2020-2030 Road Safety Strategy* (17 July 2019) (**Road To Zero**).

2.2 The submission is made by the Road Transport Forum New Zealand Inc (**RTF**).

3.0 Summary of the RTF's response

3.1 Page 7 of the consultation document poses a series of questions for commentators to consider. In our response we answer the questions most relevant to the trucking sector. We also make some general comments.

3.2 The road network is the trucking industry's primary place of work and as such, the sector is committed to improving road safety.

3.3 RTF contends that without community buy in, the strategy's objectives may remain elusive. The strategy is at times confusing, which will hamper community engagement. On one hand there is a passion to make roads safer, but on the other there is the Government's relaxed attitude to recreational

drug use, including plans to decriminalise marijuana. Drugged drivers are responsible for more deaths on our roads than those over the legal alcohol limit. There is a strong emphasis on road trimmings to create safer roads, but not enough focus on driver behaviour and distractions, which are the main causes of accidents. Changing driver behaviour is a long-term game which requires extensive social marketing, as well as an in-depth look at licencing and ongoing driver education.

- 3.4 Drug driving is one of the RTF's key concerns when it comes to road user choices, mainly because of the Government's confusing messages around this. We support a full road side drug impairment initiative – road side testing, followed by evidential testing.
- 3.5 RTF believes the consultation document presents crash data in an incoherent way, at least from the heavy vehicle users' perspective. Policy settings should come from granulated data and information on crash liability.
- 3.6 There is general agreement the roads need improving, but simply adding longitudinal median barriers and acoustic edge treatments do not compare to investing in more foundational road design improvements. Often, it is better to invest in new roads than in aftermarket treatments, especially on a section of road where the carriageway and wearing surface might have a limited life. Patching techniques used on some State Highways have the potential to disturb the trajectory of trucks and cars, leading to possible run-off-the-road accidents. We fear inadequate carriageway repairs will continue as more money is fed into the median crash barrier policy objective. Safety treatments must be suitable to the road environment and based on evidence (accident history).
- 3.7 Old roads don't have the performance reliability, in-built safety design characteristics, or the structural integrity of newly designed and commissioned roads. Roads wear out, subgrades deteriorate, and rutting and lateral cracking eventually occur, so another assumption that roads are "build and forget" is far from reality.
- 3.8 RTF does not support reducing speeds in a wholesale way without proper contextual analysis of the problem. This will just irritate all road users and likely cause more poor decision making on the roads.
- 3.9 Professional drivers are held to a higher account than other drivers in that their compliance and enforcement history can result in job loss and prohibition from driving heavy vehicles. There are three pieces of legislation covering their work. RTF believes this consultation document is not cognisant of how a commercial supply chain operates, the adequacy of the laws governing professional drivers, or the improvements in performance and safety systems in modern trucks.

- 3.10 The strategy must have measurable targets that are reported on. We hope that implementation of the strategy's components is agile enough to detect when something is not achieving the desired outcome, so any reaction is independent of political interference.

4.0 The RTF submission context

- 4.1 The commercial trucking industry is entirely reliant on a safe, reliable and resilient roading environment to conduct its business in harmony with other road users. The road network is the sector's primary place of work. This means the trucking sector has an inherent interest in programmes and strategies that enhance road safety. These need to be shaped in such a way that they don't detract from other community aspirations (such as reducing emissions), or lead to perverse outcomes and behaviours. A typical example is, suggestions that urban freight deliveries take place at night, or only with the use of small trucks. Both of these suggestions amplify negative community perceptions toward trucks and the latter doubles the emissions per tonne of payload delivered.

5.0 RTF's participation in the strategy

- 5.1 RTF's comments are largely confined to the *Road to Zero* focus aspects and the relevance of these to the trucking sector. As Ministry of Transport (MOT) officials will be aware, the RTF participated in two of the strategy workstreams (speed, and the vehicle as a place of work). Both workstream groups were made up of varied mix of interests.
- 5.2 One point we want to make from participating in the process is the difficulty that vehicle users had in getting their perspective acknowledged within a group situation where most participants were not particularly enamoured by vehicle users. This potentially meant the revised safety policy direction impact on commercial vehicle users was considered somewhat irrelevant, which in our view, was disappointing.
- 5.3 The conclusions that resulted from the initial discussions seemed to be largely an endorsement (although not entirely unreasonable) of some undisclosed policy objectives. From our observation, the approach used was not an entirely greenfield or blue-sky approach, but to be realistic, the options to improve safety responsiveness on the network had to be framed within some discernible context or backdrop.

6.0 The target

- 6.1 The case for some sort of change is well established by the raw evidence of the crash, fatal and serious injury accidents. However, on the term *Road to Zero*, with the best will in the world, zero negative outcomes on an infrastructure as complex and geometrically tortuous as New Zealand's is totally unrealistic. Arguably, even the stated target reduction in death and injury of 40% over 10 years is only marginally likely. But it is not entirely out of reach, as significant reductions in fatalities and trauma have occurred before. Most of the reductions in trauma and deaths during the period 2009 and 2016 (compared to previous years) were the result of road engineering and total system improvements, plus vehicle safety improvements. In other words, the low hanging opportunities have now been fully harvested, a point made during a subsequent discussion on the strategy following its release. Even in this period the fatality rates were inconsistent.
- 6.2 If there is no target then there is nothing to aim for, but overly optimistic targets can also lead to frustration for safety advocates as they remain beyond reach, often due to external abnormalities that officials have little influence over.

7.0 Social conscience and community buy in

- 7.1 One of the biggest hurdles facing the outcome of the strategy is community buy in. Without cross community support for the strategy's objectives, the reduction in road trauma may remain elusive.
- 7.2 The strategy's components must be evidence-based and immutable and the strategy states that is the approach being used. However, it then presents the crash data in an incoherent way, at least from the heavy vehicle users' perspective. Policy settings should come from granulated data and information on crash liability. Using inadequate "headline" data undermines confidence in "fairness" and weakens the desire to be part of the solution.
- 7.3 From a broader perspective, externality effects on crash propensity cannot be totally ignored. An example is that in a declining trajectory of economic confidence and a possibility of global economic hesitation occurring over the next few years, or alternatively rising fuel prices, there is every likelihood there will be some reduction in road deaths and injuries because the population adjusts its travel activity accordingly to stay within household expenditure constraints. Likewise, when economic activity improves people elect to become more mobile and on road activity rises, often being accompanied by increases in accidents. No Government has the ability to manage these variances in a road safety context.
- 7.4 Nor does any government initiative have the ability to counter the changes in social and ethical responses of the road users to other users of the network. There are abundant examples of selfish and self-absorbed road user behaviour.

- 7.5 Typical examples are driving under the influence of drugs and the ongoing use of cell phones while driving (*see NZ Herald Article: One driver in every three minutes caught using their cell phone in Wellington, 21 July, 2019 6:29pm*), together resulting in a considerable number of deaths and serious injuries on New Zealand roads.
- 7.6 RTF, along with the other road safety aspirants participating in the road safety strategy work stream, can postulate on the best outcomes in various working groups, but without a significant shift in the public's social perspectives and individual sensitivities toward road trauma, any change may only be marginal.

8.0 Government policy, or not?

- 8.1 The document is headed with *New Zealand Government* on the front page and then the footer on this page it states: *consultation document not government policy*. The Associate Transport Minister's foreword almost certainly confirms that in many respects, the safety aspirations contained in the document are beyond talking points. This seems to suggest the government intention to move in the policy direction as outlined in the document, and we are already seeing evidence of this.

9.0 To what extent does RTF support the proposed vision?

- 9.1 We have already commented that the vision is ambitious and aspirational and the case for change is well documented.
- 9.2 One of the problems with the consultation document is the lack of detail around the statistical evidence, including the lack of granularity around car and truck involved accidents such as fault, event characteristics, and liability. The document relies on presenting an emotive text-based analysis of the severity of safety issues and presenting what we believe, are vague broad-based data sets to support the document's policy aspirations.
- 9.3 The document consists of considerable text to explain the MOT's position of why it wants to take certain steps, some possibly not particularly palatable to certain road users, and others, with doubtful likelihood of making the impact needed. We will expand on this comment in the focus areas we have selected to comment on.
- 9.4 This vagueness of the data may appeal to the wider public who have no real interest in lifting the lid on the background of the crash data, but this doesn't work well for professional road users. Unfortunately, crash liability numbers are difficult to find on MOT's website and the consultation document provides no direct web link to this information. Interestingly, the historical crash reporting publications run out in 2016 and the last time that page was updated was 2017. Monthly crash reports run out in December 2018. This fragmented approach allows, or enables, coarse statistical data to be used to amplify the tone of the document and support the preferred policy solutions.

Disappointingly, it doesn't equip the objective commentator to validate what is proposed within a clearly framed context.

10.0 To what extent do you support the proposed decision-making principles?

10.1 **Principle 1 – we plan for people's mistakes:** This seems to be a benign, no-blame description of how things should be managed. We accept people make mistakes but more often than not, vehicle crashes are the result of some failure to exercise appropriate judgement or alternatively, wilfully errant behaviour. Neither of the aforementioned can be qualified as mistakes.

10.2 **Principle 2 – we design for human vulnerability; and 3 – we strengthen all parts of the road transport system:** Designing for human vulnerability and strengthening the system is a sort of collective aspiration somewhat indefinable unless it's broken down in to its individual operational and end application components. This approach typically requires network safety improvements.

10.3 **Principle 4 – we have a shared responsibility for improving road safety:** The shared responsibility for improving road safety is a laudable community and individual objective and must be part of the strategy, but we suspect it is the most hypothetical and elusive for the reasons explained above. If it was achievable, alcohol and drug impaired driving and mobile phone use while driving would have diminished dramatically in the past 10 years, but they haven't.

10.4 Principle 5 – our actions are grounded in evidence and evaluated:

- a) In our view, the evidence-based approach demands more accurate reporting of crash causation factors and attribution of liability. Statistics for crashes need to be set out in real terms, that take into account population growth, and light and heavy vehicle number growth, otherwise a proportionate understanding of accident rates will be unable to be reached.
- b) We know that international conventions for crash reporting demands it be done in a certain way to allow reasonable cross comparisons with different jurisdictions. Unfortunately, no matter how the crash and fatality information is stratified, cross comparisons are always fraught with risk. They are imprecise, as different jurisdictions have different contextual characteristics for example, Australia's straight roads compared to New Zealand's, with a bend or bridge every two kilometres.
- c) The common approach to comparing New Zealand fatality and serious injury rate with countries in Scandinavia, such as Sweden, only has merit in the broadest sense. In a definitive context comparing Scandinavia to New Zealand is like comparing apples and pears, due to the different political, regulatory, climate and roading environments.

- d) RTF has had access to international road safety statistics (year 2013) from a number of European countries (IRU document CSR/GE 1584/JHU) and its clear the different reporting approaches make cross comparisons difficult. However, the trend analysis approach suggests crash reductions of something in the order of 40% over the previous five years from 2008. The Belgium authorities attributed their significant reduction in fatal and significant injury crashes partially to weather conditions, but stated weather alone cannot justify the significant decrease in the number of accidents and fatalities. *"There could be a structural downward trend (brought on by improvements to vehicles and infrastructure and by a progressive change in road user behaviour) which, from one year to the other, could be either impaired or strengthened by various specific events, such as the weather. Indeed, the year 2012 is in line with a trend which, since 2005, has alternately seen a succession of "decrease years" and "stabilisation years" in relation to the number of fatalities."*

10.5 **Principle 6 – our road safety actions support health, wellbeing and liveable places:** This is largely an appeasement statement to those aspiring to support alternatives to road transport. Road safety expenditure should be agnostic.

10.6 **Principle 7 – we make safety a critical decision-making priority:** Safe roads reduce the severity of accidents, but some of the recently heralded safety treatments are not entirely without compromise, particularly where heavy vehicles are concerned. We explain this further under Focus Area 1.

11.0 To what extent do you support the focus areas?

11.1 Focus Area 1 – Infrastructure improvements and speed management

- a) There is general agreement the roads need improving, but simply adding longitudinal median barriers and acoustic edge treatments do not compare to investing in more foundational road design improvements.
- b) New Zealand has a road hierarchy under the New Zealand Transport Agency's (NZTA) one network road classification (ONRC), where roads are characterised by four levels of service and performance. Recent decisions to cancel major road and network investments and fund median barriers and acoustic edge marking, coupled with speed reductions, is a poor substitute. Old roads don't have the performance reliability, in-built safety design characteristics, or the structural integrity of newly designed and commissioned roads. Roads wear out, subgrades deteriorate, and rutting and lateral cracking eventually occur, so another assumption that roads are "build and forget" is far from reality.
- c) Often it is better to invest in totally new roads than in aftermarket treatments, especially on a section of road where the carriageway and wearing surface might have a limited life. On both SH3 and SH2 in the North Island, abysmal repair and carriageway patching techniques have been used. These have the potential to disturb the trajectory of trucks and cars, leading to possible run-off-the-road accidents. Poor repairs to edge breaks also result in tramlining of

heavy vehicle trailers. In these situations, the trailer being captured by the tramlining effect can drag the towing vehicle off the road. We fear these sorts of inadequate carriageway repairs will continue as more money is fed into the median crash barrier policy objective.

- d) While median barriers reduce, or inhibit, the likelihood of head on crashes, this approach is somewhat after the event. The poor decision, such as excess speed, impaired behaviour, and/or distraction, has already occurred. The median barriers have the potential to mitigate the injury trauma, but they have no capacity to prevent some forms of crash actually unfolding.
- e) The down side to median barriers is that where they are placed can lead to compromises, such as reducing the ability to safely pass broken down or stranded vehicles. Sometimes we see the situation where emergency services trying to get through heavily congested traffic are hampered by both a vehicle break down on the road partially blocking the way, and closeness of the barrier to the traffic stream, reducing both the traffic and emergency vehicles progressing past the stranded vehicle. This is reasonably common on coast road out of Wellington. On this stretch of road, the median barriers have been an extremely positive contributor to reducing trauma and crash deaths but interestingly, this barrier is struck so frequently you have to question the skill level of New Zealand drivers.
- f) RTF's position is that safety treatments must be of the correct type to fit the road environment. The safety treatment must be based on evidence (accident history) and result in the best outcome for the committed expenditure, using a probability analysis.
- g) Any exercise to reduce speeds in a wholesale way without a proper contextual analysis of the problem, with an accompanying safety performance evaluation, will simply irritate road users and compliance will be jeopardised, because the reduced speed won't be viewed as creditable.
- h) In a wider open road context, reducing the speed limit from 100kph to 90kph will remove the speed differential between light and heavy vehicles. The 10kph differential cushion at least provides a limited speed window for light vehicles to pass heavy vehicles. RTF certainly wouldn't support a heavy vehicle reduction in speed to 80kph as a compensatory measure to main the speed differential.
- i) There is a risk that the speed reduction/speed management and road safety treatments in this focus area might be applied in an unrefined manner to simply demonstrate change has been made. This would leave the critical infrastructure part of this focus area exposed.

11.2 RTF support for focus area 1

RTF's overall position is that it supports in principle infrastructure improvements and speed management, and is generally supportive of improved safety treatments. However, without any knowledge of the standards and processes applicable to the implementation of either, we reserve our position until such detail is available.

11.3 Focus Area 2 – Vehicle safety

- a) Safety technologies, both vehicle and driver related, are becoming more attractive to transport operators as they try to mitigate their risk, improve health and safety, and reduce insurance liabilities. Many of the newly adopted technological safety systems have a collateral health and safety benefit, assisting in deployment of the truck and being able to better manage driver work and shift obligations.
- b) New generation trucks are expected to have fully integrated original equipment manufacturer (OEM) fitted safety systems. These systems tend to be more reliable than those fitted after market. Interestingly, the frequency of truck replacements in the heavy-duty truck section of the New Zealand fleet will take place at a significantly faster pace than the replacement of light vehicles, meaning these new safety technologies will actually be in place reasonably quickly.

11.4 RTF support for Focus Area 2

RTF has no particular view on the raising of safety standards for light vehicles, but expects this initiative should go some way toward mitigating the likelihood of cars crashing into trucks which is borne out by the historical crash liability data on MOT's website, showing between 2012 and 2016 truck responsibility in fatal crashes involving another vehicle at 25% and in injury accidents at 38%.

11.5 Focus Area 3 - Work related road safety

- a) This section of the consultation document proposes improving the data and knowledge around the WorkSafe provisions and the transport legislation that applies to transport businesses, and seeks to encourage best practice safety standards in the supply chain. The latter aspect is encouraging, but the focus seems to be on the commercial transport operator and largely ignores the fact that customers dictate the work day programme. We have taken this view because, in the **immediate actions** section under *Strengthening commercial transport legislation*, it states the outcomes of a review of the regulatory system under which NZTA manages the sector will be implemented, and there will be a review of the log book work time requirements. It also touches on improving fatigue management.

- b) For the record, the work time provisions in New Zealand and the fatigue management option incorporated in legislation were designed taking into account best international practice and rest and recovery guidance, and the advice of academics with extensive international experience in fatigue management.
- c) RTF is concerned that what is suggested lacks detail and fails to recognise how the supply chain operates. We are concerned the industry will be held accountable for the lack of accountability in parts of the supply chain that are beyond the operators' scope of influence.
- d) Professional commercial drivers are held to higher level of account than other drivers in that their compliance and enforcement history can result in job loss and prohibition from driving heavy vehicles under the "fit and proper person" criteria of the Land Transport Act 1998. In fact, the trucking sector can be held account under the Health and Safety at Work Act 2015, the fit and proper person provisions of the Land Transport Act, and any safety oversights where injury results can lead to reparation orders awarded to the injured party under the Sentencing Act 2002.
- e) This section of the strategy appears to rely heavily on the 2018 Clare George thesis which is cited in the references. This work has a number of short comings, one being the sample size for the interviews. This was not a statistically reliable survey, but more of the anecdotal variety, as it was a series of self-selecting interviews. It ignores the significant investment in driver training and health and wellbeing, including driver performance monitoring, that's taking place across all sectors. Using this single reference work as being indicative of the safety performance of the sector as a whole is totally unacceptable.

11.6 RTF Support for Focus Area 3

- a) RTF supports aspects of this focus area, but believes the provision of the chain of responsibility (COR) must be updated to bring the supply chain into some order of capability for drivers' rest and work time compliance.
- b) In the USA, the flexible approach that the paper-based recording system allowed has become a casualty of the new electronic time signature process. US authorities have recognised this and are currently seeking to address driver detention times. This is a parallel issue in New Zealand, where truck drivers are held up for loading and unloading for extraordinarily long periods at wharves, timber yards, and client premises.

- c) While the research into the impact of driver detention is only in the exploratory stage by the Federal Motor Carrier Safety Authority (FMSCA) in the United States, RTF believes New Zealand authorities should explore how this might be rolled into the New Zealand chain of responsibility provisions. In many cases, driver or vehicle detention times in New Zealand are too long. These delays are compromising the driver's daily duties and the opportunity to take their prescribed rests.
- d) At present, the COR provisions are too coarse and rely heavily of the transport operator to implicate their customer.
- e) This aspect of the legislation needs to be reframed to be effective in terms of supply chain management.

11.7 **Focus Area 4 - Road user choices**

Our preliminary comments highlight the difficulties of achieving broad community support. Driver impairment arising from consumption of drugs and alcohol is set out in this section and the RTF's position and support for road side drug testing, followed by evidential testing, is well documented. We also support the need for a central repository of driver information where drivers have failed drug tests. This is so that those individuals cannot move from employer to employer without a mandatory check by a prospective new employer. Given that deaths from drug impaired drivers now exceed those from alcohol impaired drivers, it is clear there is a need for a full road side drug impairment initiative. What is disturbing when contrasted with the road safety agenda, is the well-publicised desire from this Government to support recreational marijuana use.

11.8 **RTF support for Focus Area 4**

- a) We believe this section stands alone as deserving more in-depth analysis, due to the complexity of the issues.
- b) To adjust road safety solutions to a simple binary approach does the complexity of the problems an injustice. While many decry the education option, it seems things won't really change until road safety and cooperative public responsibility of road users for one another becomes the newly defined cultural position.
- c) This section also takes on the issue of driver drug testing, a factor that has already been the subject of both public and [RTF submissions](#). We believe the Government's position on road safety is incongruous with its liberal approach to recreational drug use. The confusing, or arguably inconsistent approach, we see in the road safety vision document taking a more hard-line approach to minimising the impact of drug related driver impairment. But the drug driver testing document appeared more relaxed, offering all sorts of caveats on what action should be taken to inhibit drug impairment among road users.

11.9 Focus Area 5 - System management

The reality and success of this focus area will only become clear when individual experiences of the coordination and accountability of this aspect of the strategy are documented and reported on, against some form of base line. The standards for the infrastructure are well established in present network designs, but trying to incorporate opportunities for all user groups is not feasible. This “everything fits” approach adds dead weight costs to any road investment and often lacks sufficient financial rigour. What road user organisations who actually fund the land transport fund see is the roading investment budget further compromised by “nice-to-haves”. This is a woeful approach in the current climate where government has already elected to draw money from the Land Transport Fund to a feed rail operational and capital works funding.

11.10 RTF support for Focus Area 5

The RTF supports better collaboration between all the parties who have an interest in road safety, but the approach to decisions and desired solutions must be evaluated with consistency and rigour. The wording in the immediate actions section reads well, predicting an aspirational approach, but RTF is not convinced the community of parties can achieve the objectives. The fact that so little is actually nailed down in this section makes it difficult to gauge what we are supporting.

11.11 Focus Area 6 - Measuring success

- a) Many of the indicators are points (pages 58/60) we would have expected MOT and NZTA to monitor already, so in most part, there is nothing new here. RTF would argue that proportions of the road network with various speed reductions and contextual speed changes is not a measure of success, but a measure of the Crown agencies’ influence over road controlling authorities. Furthermore, measuring the number of vehicle users caught over the speed limits is not a very convincing measure of road safety performance. It’s too context variable.
- b) The base reference year is 2018 and the forward reference year is 2030 for both over-arching outcome measures and indicator ratios. This same period applies to the proposed reduction in fatalities and serious injury crashes (outcome measures) as identified in the document.
- c) The indicator data sets are to measure various aspects of vehicle safety and vehicle standards as contributing factors, which is probably useful from a broad vehicle policy perspective. This approach appears to be underpinned by the need to demonstrate a clear policy objective around the importance of safer vehicles, because intentionally over emphasising this aspect impacts on the groups in society who can least afford the more recent vehicles with their modern safety attributes.

- d) Conversely, looking at liability, there is a reluctance in respect of heavy vehicle involved accidents to attribute liability. The data sets on MOT's website (YR 2017) show a relative consistency of the heavy vehicles being primarily liable in some 25% to 40% of cases (depending on whether it's a fatal or serious injury accident). The concern RTF has with the present approach is the broad data presents heavy vehicles (trucks) negatively in terms of the accident statistics. For example, citing truck involvement as a percentage of all fatalities unnecessarily stigmatises the industry in that the percentage of all fatal accidents points toward greater liability than is actually the case.

11.12 RTF support for Focus Area 6

In the past, RTF received the truck fatality data two-monthly, with simple short paragraph explanations of the circumstances relevant to each. We also received quarterly Commercial Vehicle Safety Team (CVST) reports called *The heavy truck and bus crash reports*, which provided information about compliance, loadings, load safety, drug or alcohol impairment, and worktime non-compliance, that may have influenced the crash. Without these two important sources of data, the RTF is in no position to argue its safety case when the media takes an anti-trucking position. We are unsure why the reporting stopped, though we are aware weekly reports of this data exist. The importance of accurate and sufficiently granulated crash event data cannot be ignored, especially in an environment where Ministers make unsubstantiated statements about dangers of trucks on the roads.

12.0 Concluding comments

- 12.1 The *Road to Zero* is an interesting, but sometimes unconvincing commentary on New Zealand's approach to road safety. Much of what is in the document is relatively high level and arguably, business as usual, except that a range of safety related road-use principles have been codified in one place to form the strategy.
- 12.2 The solutions to reducing the road toll and improving safety are inherently complex. Distilling them down to one-line objectives presents ideas that sound nice, but risk failing to catch public commitment and imagination to support the focus outcomes. There is always the possibility of a disconnect between what people say they want and what they are actually prepared to accept. Inevitably, policies that impede traffic flow and impact travel times (the coarse speed reduction policy, for example) for no measurable benefit are the ones that will generate the most opposition.
- 12.3 We acknowledge that without targets there is nothing to aim for, so in that respect the document sets some specific goals. We hope implementation of the strategy's components is agile enough to detect when something is not achieving the desired outcome, so it is independent of political interference.

12.4 As final comment, while the strategy is subject to formal consultation, Ministers are making decisions about additional safety expenditure and cycling infrastructure improvements on another 2400km of road, over the initial 870km, citing the benefits of barriers on SH3 as the reason for this latest decision (Ministerial media release, 25 July 2019). Making pre-emptive decisions that are aligned to the consultation phase (around the *Road to Zero* proposals outlined in the document) brings its whole purpose into question.