



25 September 2026

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Office of Road Safety and Programs
Via: officeofroadsafety@infrastructure.gov.au

Dear ██████████

Mid-term Review of the National Road Safety Strategy 2021-2030

The Livestock, Bulk and Rural Carriers Association (LBRCA) represents rural carriers performing some of Australia's most essential and challenging freight tasks, including the movement of livestock, grain, agricultural inputs, bulk commodities and other freight throughout remote, rural and regional Australia.

Our members operate at the first and last mile of regional supply chains and, in many cases, across the entire freight journey. They depend on safe, reliable and productive road networks and interact extensively with railheads, ports, saleyards, processors, farms, feedlots, grain facilities, other road users and intermodal terminals. We are positioned to provide the unique perspective of rural carriers operating in some of the toughest road conditions in Australia. They face poor road design, bridge limits, increasing interaction with OSOM movements, long distances, fatigue management and challenging loads such as livestock and liquids. Although the heavy vehicle fatality rate has risen from its 2021–22 low of 7.91, the latest rate remains slightly below the 2019–20 rate despite considerably more truck movements.

There are few tangible heavy vehicle related measures, a historically consistent approach of the NRSAP. The heavy vehicle sector is already subject to numerous regulatory systems, which fragment the road safety approach and reduces the ability to develop new, non-regulatory or mandated actions that do not adversely affect the sector. The road safety implications of heavy vehicles need to be considered in the broader scope of the task.

The LBRCA has considered EY's Mid-term Review of the National Road Safety Strategy 2021-2030 and submits the following for consideration. Scott O'Connell, LBRCA's General Manager of Policy and Advocacy and can be contacted on 0413 424 384 or scott.oconnel@lbrca.org.au to discuss further.

Yours sincerely,

Wade Lewis
President
Livestock, Bulk and Rural Carriers Association Inc.



LBRCA response to the Mid-term Review of the National Road Safety Strategy 2021–2030

The Livestock, Bulk and Rural Carriers Association (LBRCA) welcomes the publication of the Mid-term Review of the National Road Safety Strategy 2021–2030. We support its call for clearer national priorities, consistent data and actions tied to measurable safety outcomes. Noting that the expectation is that the next National Road Safety Action Plan will be released later in 2026, it would be beneficial if the department further considered industry feedback before finalising the heavy vehicle and regional road actions.

We propose deliverable commitments to be considered as part of the revised plan and actions to support improved heavy vehicle related safety outcomes.



Recommendation Actions for the updated National Road Safety Action Plan

LBRCA supports a stronger national focus on heavy vehicle and road safety. However, the next National Road Safety Action Plan should target the causes of road trauma, recognise the operating realities of regional freight, and ensure any new interventions are supported by evidence and measurable safety outcomes

1. Improve heavy vehicle crash and serious injury data and distinguish heavy vehicle involvement from causation. A crash involving a truck should not automatically be treated as a crash caused by the truck or its driver.
 - a. Publish disaggregated crash and serious-injury data. Data should identify causation, road type, vehicle configuration, location, operating environment and other relevant factors so policy is based on the actual source of risk.
2. Prioritise regional road condition and infrastructure. Greater emphasis should be placed on regional freight routes, road surfaces, shoulders, overtaking opportunities, intersections, heavy vehicle rest areas and safe livestock loading infrastructure, as opposed to simplistic approaches such as speed limit reductions.
3. Link competency based licensing reform to improve road safety. A nationally consistent competency based framework should provide safer entry and progression pathways for young drivers and mature age entrants, with advancement based on demonstrated competence rather than elapsed licence holding periods.
4. Recognise the safety benefits of modern vehicles. The Action Plan should acknowledge the improved stability, braking, tracking and reduced vehicle movements that well designed PBS and higher productivity/higher mass combinations can provide, with proven operating conditions applied.
5. Avoid treating enforcement as a substitute for infrastructure investment. Enforcement should target genuinely unsafe behaviour, but additional compliance activity cannot compensate for deficient roads, inadequate rest facilities, poor infrastructure or lack of regulatory education.
6. Recognise and reward voluntary industry safety initiatives. Heavy vehicle safety is not delivered by regulation alone. Industry already invests significant time and resources in voluntary programs, accreditation schemes, codes of practice and training initiatives that go beyond minimum legal requirements.



Improve heavy vehicle crash and serious injury data

The Mid-term Review reports a heavy-vehicle fatality rate of 9.27 fatalities per billion vehicle kilometres travelled in 2023–24, compared with 4.18 for passenger vehicles (Table 4, pp. 26–27). These figures are useful measures of exposure, but they do not establish which road user caused or materially contributed to an individual crash. Treating heavy vehicle involvement as equivalent to heavy vehicle causation risks producing poorly targeted policy and enforcement, as well as headline grabbing statistics that do not inform good decision making. However, these do demonise heavy vehicle drivers and suggest they are operating unsafely.

The 9.27 VKT statistic measures fatalities relative to heavy vehicle kilometres travelled, but heavy vehicles perform a different transport task from passenger cars. A truck can carry many times more people or tonnes of freight per trip, so vehicle-kilometres alone can be a misleading basis for comparing transport modes. Furthermore, the statistic can reflect the vulnerability of *other vehicles' occupants*, rather than indicating that travelling in a heavy vehicle itself is more dangerous.

Heavy vehicles spend substantial time on highways and major freight routes and have different driving patterns, distances, and operating conditions from passenger vehicles. A per-kilometre comparison does not automatically control for those differences.

The Review also identifies ongoing weaknesses in nationally consistent definitions and in the integration of police, health, and transport data (pp. 38–39). Serious injury data remains particularly difficult to compare consistently across jurisdictions.

Requested action

The Australian Government, through the Office of Road Safety and in partnership with states and territories, should establish and progressively publish a nationally consistent fatal and serious injury crash dataset that:

- distinguishes heavy vehicle involvement from assessed crash causation and contributing factors
- identifies factors such as vehicle configuration, road type, remoteness and speed environment
- records relevant freight task information where practicable
- adopts a nationally agreed serious injury definition
- reports data completeness and jurisdictional consistency
- protects personal and commercially sensitive information.

Until this framework is established, governments should avoid using fleet level involvement rates as a proxy for driver fault or as the sole basis for regulatory intervention.



Prioritise safer regional freight corridors, rest areas and supporting infrastructure

The Review records substantially higher fatality rates in regional and very remote Australia and identifies road conditions, long travel distances, and the road environment as important contributors to the road safety risk in these regions (pp. 22–23).

For rural carriers, safety is directly affected by the network's condition and design. Narrow roadways, degraded pavements, weak shoulders, deficient bridges, unsafe intersections, inadequate overtaking opportunities, disaster prone links and poorly located rest areas can materially increase risk.

The findings are consistent with the NSW Parliament Joint Standing Committee on Road Safety inquiry¹ into regional road trauma, which also examined the interaction between road conditions, fatigue, speed and driver behaviour.

Requested action

Governments should establish, expand and prioritise funding pathways for regional heavy vehicle infrastructure programs with transparent project selection criteria based on crash risk, freight importance, and network deficiencies.

As part of this program, governments should:

- identify and treat priority regional heavy vehicle crash corridors
- avoid kneejerk reactions and broad speed reductions
- audit heavy vehicle rest area spacing, capacity and suitability against actual freight routes and fatigue requirements
- publish a staged plan to close identified rest area gaps
- measure usable heavy vehicle bays and safe stopping opportunities, rather than simply counting rest area sites
- provide appropriate livestock parking and animal welfare facilities where required, including support for complementary infrastructure such as truck wash facilities, decoupling areas, inspection facilities and heavy vehicle recharging sites.

LBRCA recommends reinstating a standalone Heavy Vehicle Safety and Productivity Program, with simpler access arrangements and broader eligibility. The program should be available to state and local governments and, where appropriate, cooperatives and private heavy vehicle businesses or delivery partners, where they can provide infrastructure that provides a demonstrable public benefit.

¹Interventions to reduce road trauma in regional NSW caused by speeding, fatigue, drink and drug driving
<https://www.parliament.nsw.gov.au/parliamentary-business/committees/inquiry-details?committeeInquiryId=3102>



Link competency-based licensing reform to road safety

Heavy vehicle licensing remains inconsistent across jurisdictions, and progression still depends heavily on minimum licence holding periods rather than demonstrated competence. This can delay capable drivers from progressing safely while doing little to guarantee that time served translates into competence on the vehicle combination or operating task ultimately performed.

Experience makes a difference in heavy vehicle operating environments and South Australia's recent reforms are an example of improvement. The issue is particularly acute in regional Australia, where access to trainers, assessors and testing can be limited and where the freight task often involves complex vehicle combinations, long-distance driving, livestock or bulk handling and operation on lower-standard roads.

A nationally consistent competency-based framework would allow governments to improve safety at the point of workforce entry and progression by ensuring drivers are assessed against the skills, vehicle types and operating conditions relevant to the work they will undertake. It also addresses the gap between when formal training takes place and when a person can commence driving various combinations.

Requested action

The next National Road Safety Action Plan should support existing reforms to competency-based heavy vehicle licensing as a national road safety priority and encourage jurisdictions to work toward a harmonised framework. The framework should:

- replace unnecessary elapsed time progression requirements with demonstrated competency where appropriate
- provide structured pathways for young entrants and mature-age drivers
- require supervised progression and practical assessment on relevant vehicle combinations
- establish nationally consistent competency, training and assessment standards
- improve access to trainers, assessors and testing in regional areas
- provide for recognition of prior experience and demonstrated competence
- publish measurable safety outcomes from licensing reforms and trials.

We are not proposing a new stream of reform work. LBRCA encourages the NRSS, through the Action Plan, to support the benefits of licensing harmonisation and competency reforms underway. There are material safety benefits to having a consistent competency based licensing system, including across borders, overseas licensing assurance and ensuring all drivers operate within the Australian condition and regulatory environment.



Recognise the safety benefits of modern vehicles

Road safety policy should assess heavy vehicles according to their demonstrated safety performance, the performance of the network and total freight task, not simply vehicle length, mass or configuration.

Modern heavy vehicles, including Performance Based Standards (PBS), higher mass and higher productivity freight vehicles are engineered and assessed against defined safety and performance criteria, including stability, braking, tracking and manoeuvrability. In addition to other regulatory requirements and compliance procedures. This is supported by recent changes to general access vehicle length and mass in the Heavy Vehicle National Law.

Higher productivity and higher-mass combinations can also reduce the number of vehicle movements required to move a given volume of freight. Existing network access arrangements also provide additional conditions to improve safety and measure performance, including smart on board mass and telematics.

Fewer trips can reduce total exposure to crash risk, including VKT, while modern vehicle design can improve dynamic performance compared with conventional combinations, as well as deliver new safety technologies into the national fleet. The LBRCA maintains a position that higher productivity vehicles can aid in 'right mode for the right load' and should be applied where safe to do so, considering infrastructure, road condition, access requirements and with skilled drivers. However, these safety and exposure benefits are not always reflected consistently in road safety policy or access decision making.

Requested action

The next National Road Safety Action Plan should explicitly recognise the PBS framework and appropriately supported regulatory changes for higher mass vehicles, including recent changes to General Mass and Length. These may offer potential road-safety measures where their benefits are demonstrated. Governments should adopt a nationally consistent evaluation high performance framework that considers:

- vehicle stability, braking, tracking and manoeuvrability
- crash and serious-injury performance by vehicle configuration
- total vehicle kilometres travelled for an equivalent freight task
- the number of vehicle movements replaced
- compatibility with road and bridge infrastructure
- the contribution of newer vehicle and trailer technologies.

Road agencies should be required to consider these demonstrated safety benefits when assessing access and network suitability. Where a higher productivity combination can demonstrate equivalent or superior safety performance and reduce total freight movements, the access policy should facilitate its use on suitable roads rather than rely solely on conventional length, mass or configuration thresholds.



Avoid treating enforcement as a substitute for infrastructure investment

Enforcement is an important part of the road safety system and should target behaviour that is genuinely high risk, and demonstrably linked to fatal and serious injury risk. Enforcement cannot compensate for deficiencies in the road network or supporting heavy vehicle infrastructure.

Additional roadside inspections, infringements or compliance activity will not correct narrow pavements, weak shoulders, unsafe intersections, deficient bridges, poor road surfaces, inadequate overtaking opportunities or a lack of suitable heavy vehicle rest areas. Neither will it educate drivers and operators in areas they may require further training or information.

There is a risk that enforcement becomes the default response because it is easier to implement and count than infrastructure improvement. Enforcement statistics such as inspections, interceptions and infringements measure activity. They do not, by themselves, demonstrate improved safety.

Requested action

The next National Road Safety Action Plan should require enforcement initiatives to be linked directly to identified safety risks and assessed against actual safety outcomes. For new or expanded heavy vehicle enforcement measures, governments should identify:

- the unsafe behaviour or risk being targeted
- the evidence linking that behaviour to fatalities or serious injuries
- whether infrastructure deficiencies contribute to the risk
- the expected safety benefit of the proposed enforcement response
- any complementary infrastructure, education or regulatory measures required
- the indicators that will be used to determine whether the intervention reduces harm.

The Action Plan should also distinguish between enforcement of genuinely safety critical behaviour and technical or administrative noncompliance that has little demonstrated relationship with fatal or serious-injury risk.

Annual reporting should assess whether enforcement initiatives have reduced fatalities, serious injuries or identified risk behaviours, rather than treating higher infringement or inspection numbers as a safety outcome.



Recognise and reward voluntary industry safety initiatives

Heavy vehicle safety is not delivered by regulation alone. Industry already invests significant time and resources in

voluntary programs, accreditation schemes, codes of practice and training initiatives that go beyond minimum legal requirements.

Examples include the Heavy Vehicle Rollover Awareness Program (HVRAP), animal welfare best practice, accreditation, operator safety management systems, industry codes of practice and commodity specific training.

HVRAP, developed by LBRCA with support from the NHVR Heavy Vehicle Safety Initiative and other industry partners, is specifically aimed at reducing heavy-vehicle rollovers and serious crashes. Its evaluation found that participants reported increased knowledge and adoption of new safety practices, and the program has subsequently been incorporated into industry training and accreditation arrangements.

The broader heavy vehicle accreditation framework also recognises the value of operators voluntarily demonstrating stronger safety management capability and moving beyond prescriptive compliance toward evidence based safety assurance.

Despite this, voluntary industry investment is not always recognised in road safety policy, regulatory treatment or government procurement. The National Road Safety Action Plan should therefore recognise credible voluntary safety initiatives undertaken by the heavy vehicle sector, as part of the national safety system.

Requested action

The next National Road Safety Action Plan should establish a framework for recognising credible voluntary industry safety programs, accreditation and codes of practice that demonstrably exceed minimum regulatory requirements. The framework should:

- identify recognised industry led safety programs, accreditation schemes and codes of practice
- recognise programs such as HVRAP and relevant industry codes
- allow demonstrated participation in recognised programs to inform risk based regulatory and enforcement approaches
- consider recognised safety accreditation in government procurement, contracting and access arrangements where relevant
- encourage insurers, customers and supply chain parties to recognise credible voluntary safety investments
- provide a pathway for successful industry-led initiatives to be expanded nationally where evaluation demonstrates improved safety outcomes.

Recognition should not amount to an exemption from core safety duties or provide automatic immunity from enforcement. It should allow regulators to distinguish between operators that can demonstrate mature, independently verifiable approaches to proactive safety efforts.



Conclusion

LBRCA supports the call for a National Road Safety Action Plan that has clear national priorities, stronger performance monitoring and a greater focus on fatality and serious injury outcomes.

For the next Action Plan to be effective, accountability must be built into its design. Heavy vehicle and regional road actions should have clear ownership, identified delivery partners, implementation milestones, funding pathways, baseline data and defined evaluation periods. Progress should be reported consistently across jurisdictions and, where appropriate, distinguish between regional and remote outcomes.

Measures that demonstrate measurable safety benefits should be expanded. Measures that do not should be revised, replaced or discontinued.

Industry must also have a formal role in this process. Rural carriers bring practical knowledge of road conditions, vehicle performance, fatigue constraints, loading environments and emergency response requirements that cannot be replicated through administrative data alone.

LBRCA continues to play a proactive role in responding to government consultations and advocating for rural carriers.

Ultimately, the next National Road Safety Action Plan should deliver safer roads, safer vehicles, safer drivers and fewer deaths and serious injuries.