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Road Safety Strategy 2020-2030: *Road to Zero*

NZAA submission

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Background on the New Zealand Automobile Association

The New Zealand Automobile Association (NZAA) is an incorporated society with over 1.7 million Members. Originally founded in 1903 as an automobile users advocacy group today it represents the interests of road users who collectively pay over \$3 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. The NZAA's advocacy and policy work mainly focuses on protecting the freedom of choice and rights of motorists, keeping the cost of motoring fair and reasonable, and enhancing the safety of all road users.

Content of this Submission

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Executive Summary

The *Road to Zero* discussion document tells a compelling story and outlines a strong vision for improvement. It builds on a *Safe System* approach, which is very similar to the approach used for the previous *Safer Journeys* strategies. None of the principles, focus areas, or immediate actions would be out of place in a *Safer Journeys* strategy.

What is new is the inclusion of a very ambitious target of a 40 percent reduction in deaths and serious injuries within a decade. The discussion document says that modelling suggests this is achievable, based on a substantial programme of road safety improvements. But the draft strategy itself is short on detail or concrete actions, including trade-offs that will need to be made, by decision-makers and the community at large. If we are to achieve similar reductions in deaths and serious injuries as in other countries that have adopted the "Vision Zero" approach, then we will need comparable levels of investment in all pillars of the *Safe System*. The final strategy needs to explicitly set out what resourcing and money is going to sit behind it in order to achieve the target, and how this is going to be rolled out.

Road Safety Strategy 2020-2030: *Road to Zero*

The NZAA's submission comments on each of the sections of the draft strategy: vision, target, principles and focus areas.

1. Vision

The *Road to Zero* strategy sets out a proposed vision of “a New Zealand where no one is killed or seriously injured in road crashes.” This vision is based on the Vision Zero approach that is accepted as a world leading approach to road safety.

When implemented as intended, a Vision Zero approach puts safety as the highest priority in all transport decisions, giving it precedence over other relevant issues, such as those included in the New Zealand Government Policy Statement on Land Transport including access and value for money. Two (related) issues stand out to the NZAA as needing to be clearly addressed if we are to implement a vision zero approach in a meaningful way, and avoid it becoming a ‘tag line’ to the latest road safety campaign. We don't see these issues addressed adequately in the draft strategy.

The first is that decision makers in the transport system, from senior officials through to local and central government politicians, need to be supported in making decisions that will require considerable trade-offs, many of which will not be understood or supported by the travelling (and voting) public. We already see this in simple cases such as the installation of median barriers and rumble strips, where local residents push back against their installation as it is perceived to restrict their access, or create noise issues. More complex examples such as allowing the importation of cars that have 1- or 2-star safety ratings, are clearly challenging and will force local and central decision makers into uncomfortable public positions. If we are to meaningfully implement a vision zero approach, we need to ensure that decision makers understand the inevitable difficult decisions and trade-offs they will need to make.

The second issue relates to the availability of funding to support a new vision (and an ambitious target). Trade-offs are made easier where resources are available to “ease the pain” and provide something to both sides of the deal. Simplistically, for example, the addition of protected turn-around bays, or high quality separated cycle ways, help to address some of the trade-off issues noted above – but these will require considerable funding input.

Furthermore, we know that certain road safety treatments such as the installation of barriers and roundabouts have proven safety benefits, yet as we are seeing in examples such as State Highway 58 in Wellington, there are currently not sufficient resources available to allow the NZTA to fully commit to providing these safety infrastructure improvements. This on a road that is in the flagship Safe Network Programme and is clearly under considerable and growing pressure.

As pointed out elsewhere in our submission, many countries that have implemented a vision zero approach have invested considerably more into road safety infrastructure than New Zealand historically has. Our length of median barriers is less than a fifth of that found in Sweden, a country we look to as a model of vision zero. As currently drafted, there is no information in the draft Strategy to show what new resource will be made available to support a change to a vision zero-based approach and achieve the ambitious target that has been set.

While the NZAA strongly supports an ambitious approach to improving road safety, including putting safety as a leading priority, we would like to see considerably more detail on the funding and resources that are being dedicated to safety, to ensure that there is real and meaningful progress. Without a noticeable increase in funds, the risk is that no arrest in the current trend will result from the *Road to Zero* approach, and it will simply be seen as a new 'tag line'. We expand on this point below.

2. Where do we want to be by 2030?

The NZAA is a long-time advocate for better road safety and there is no doubt that New Zealand can and needs to do much better than we currently are.

Setting targets for reductions in deaths and serious injuries on our roads will create a clear measure for whether the strategy is succeeding. The 40% reduction that is being aimed for by 2030 is an ambitious goal and one that everyone connected to road safety would love to see happen.

Setting a target and achieving it are two different things however, and as noted previously, the NZAA has concerns that the immediate actions in the strategy consultation do not show a clear path to the end goal. In many cases the proposed actions are still light on detail and the document gives no insight into any modelling or analysis that had been done as to what impact different actions may have.

The NZAA looked at Europe and Australia to see what other countries and states have achieved in road safety over similar time periods. Appendix 1 shows that while a number of countries and states achieved 30%+ reductions in road deaths in a decade, doing so for serious injuries has proved harder.

We took Statistics NZ's mid-point population forecast for NZ in 2030 and combined that with three possible trends in vehicle kilometres travelled over the upcoming decade. These all are in line with projections from the Ministry of Transport's 2017 *Transport Outlook: Future State* report. These calculations (Appendix 2) show that achieving the desired reduction in road deaths will require New Zealand in 2030 to have the same rate of road deaths per billion kilometres travelled as the Netherlands and Germany currently do.

Delivering this will require commitment and investment from the Government at a vastly greater scale than has ever happened before.

If we look at one of the global road safety leaders, Sweden, for example, they have invested enormously in upgrading highways under their Vision Zero strategy and now have more than 5000km of median divided highway (approximately 5% of their road network). This compares to less than 700km that New Zealand is on track to have by 2021 (less than 1% of New Zealand's road network). If we had even half the length of divided highway that Sweden does it would equate to median barriers all the way from Cape Reinga to Bluff on SH1, plus a divided highway from New Plymouth across to Gisborne. The strategy does not give any indication that this scale of investment in infrastructure is likely, yet these are the types of measures that will be needed to reach the stated targets.

3. Principles

The NZAA supports the seven principles, which follow the internationally-recognised *Safe System* approach.

In respect of Principle 3 'We strengthen all parts of the transport system', we support the principle, but fear there is not a balanced commitment on strengthening all pillars of the *Safe System* equally. The NZAA is concerned that not enough investment is being made in engineering up roads and roadsides, and instead only reducing the speed limits.

With Principle 5 'our actions are grounded in evidence and evaluated', we believe more research is needed to develop a solid evidence-base to inform the actions that will have the most impact on reducing fatal and serious crashes.

4. Focus Areas

We comment on each of the focus areas, and proposed immediate actions below.

4.1 Focus Area 1: Infrastructure improvements and speed management

The *Road to Zero* strategy has set out four immediate actions in the infrastructure improvement and safe speeds area. Their high level nature and general alignment with a *Safe System* approach, means they are generally well aligned with the NZAAs own [Election Calls](#). However, the lack of detail in terms of what is proposed (how much, where, when and at what cost) means that we are unable to assess how these actions may contribute to improved road safety or impact on motorists.

Below are our specific comments on the proposed immediate actions:

Further investment in safety treatments and infrastructure improvements

While we support this action, a great deal more clarity is needed on the funding levels being provided (even now we are unsure of how local government's contribution is being accounted for) in terms of infrastructure that will be provided. There is not a clear picture of this which means it is not possible to benchmark and track progress.

The NZAA contends that infrastructure investment is required to be considered in conjunction with speed limit changes and that it should not be an either/or scenario.

Of considerable concern is the lack of intermediate indicators in the draft strategy around the level of investment into infrastructure. All but two of the indicators in the infrastructure and speed section of the outcome framework relate to speeds, speed limits or speed enforcement. One indicator references the common crash types that safe infrastructure would prevent, and one references the IRR. While we agree these are important outcomes, given the emphasis on infrastructure investment, we would expect to see some intermediate measures to drive investment in infrastructure.

Review infrastructure standards and guidelines

Consistent design and having "self-explaining roads" is an area that we have been advocating for (and researching through the AA Research Foundation) for a number of years. We support the intent of this action. However, rather than focus on urban street design guidance (which we interpret as potentially more about liveable streets and urban spaces) we consider that this

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action must focus on highest risk areas of the network, and use risk to define what standards are the highest priority for action. It may be that this includes urban streets, but we know from feedback from our NZAA Districts that rumble strips and median barriers are being installed inconsistently – that must be the focus of a safety strategy.

A new approach to tackling unsafe speeds

The NZAA tentatively supports a reform of the process for the setting of speed limits by RCAs and the consultation processes around this, but as there is no detail around this yet, we'll reserve our position until this new process is consulted on. However we do have some observations on the speed limit setting process to date.

We are concerned that such reforms do not remove the opportunity for proper consultation on speed limit changes with communities and users. The NZAA sees such consultation as vital to ensure public support for speed limit changes. We have seen very mixed performance by RCAs and we would be very reticent to see changes made that simply endorsed poor practice and allowed RCAs to push through changes based on poor or inconsistent processes.

The NZAA supports the Speed Management Guide (SMG) focussing on the top 10% of the roading network, so for consistency and public acceptance of the programme individual RCAs should be discouraged from reviewing more than 10% of their networks until an initial national 10% rollout has been achieved.

The NZAA is also concerned that although the SMG strongly recommends “engineering up” be considered where this is desirable to maintain appropriate travel speeds on roads with high classifications under the One Network Road Classification (ONRC), this has not been the practice to date. Thus far there have been no examples of roads reviewed under the SMG being engineered up, but instead all the roads reviewed have only had speed limit reductions. Where there has been engineering up, such as on SH1 Picton-Christchurch, speed limits have also been reduced. That leads us to the conclusion that the SMG is not being implemented in line with its stated intent. If this lack of engineering up to retain current speed limits on high volume roads, or investment to make roads self-explaining continues then we are concerned that more people will be caught out when not intentionally speeding, and thus support for the programme will erode.

The NZAA contends that major roads like SH1 at the top of the ORNC system hierarchy should not have speed limits reduced from 100km/h to 60km/h (as in the Hunderlees section of SH1 Picton-Christchurch) as this makes no sense to the public or users, and this will also undermine public support for the SMG programme.

We are also concerned with the mismatch of the public conversation in which politicians have said that there will be “lower speed limits on some roads with lower volumes of traffic”. In reality the top 10% of the network equates to 9,600km of roads and, as the collective risk is associated with high traffic volumes, these will in fact be our busiest roads. We do not think that the public understands this and the current communication as to the extent of the programme is unhelpful.

In principle the NZAA supports slower speeds around schools, provided the changes are well executed and based on good local engagement.

The NZAA supports the move to an overt and transparent speed camera enforcement programme following the Swedish model, where they are located in high risk locations, are

clearly signed and promoted, but do not operate full-time. However, we have seen a very poor response to our long-term calls for signage to date and so our support here will be entirely conditional on the cameras being located to risk, and well signed. The NZAA strongly suggests that the standard international signage be used warning road users of the safety cameras, and including a symbol of a camera. The use of esoteric signage such as “high crash risk” does not inform the public of enforcement or maximise compliance. Such signage also is inadequate to advise visiting drivers who will not have learned the local hidden meaning of such signage. An overt approach means overt signage and wording and images need to reflect this.

To support adopting the Swedish model, the NZAA calls for the urgent upgrading of the Motor Vehicle Register to collect owner email and cellphone details so that enforcement notices can be more quickly and accurately issued. The current system can take 6 weeks or more to issue an infringement notice. This removes any immediacy effect and can lead to multiple infringements especially when new cameras are first installed.

Speed camera sites need to be audited at least annually and managed closely for ticketing rates when first installed to address excess ticketing and to identify if other infrastructure work is needed to better explain the speed limit to users.

The NZAA also encourages greater use of electronic roadside speed advisory signs in high risk areas. These are proven to manage speeds and come without enforcement cost. These signs could also include positive messages to acknowledge motorists driving at or below the speed limit.

The NZAA is supportive of trialling ‘point to point’ or average speed cameras where this is the most appropriate option for speed management e.g. 110km/h expressways, tunnels and possibly long-term roadworks sites.

4.2 Focus Area 2: Vehicle Safety

In terms of the four pillars of the *Safe System*, we consider the ‘safer vehicles’ pillar is one area that has not had enough focus in New Zealand under the last *Safer Journeys* strategy. The NZAA believes there is more that can be done to improve the safety of the vehicle fleet, which in turn will help achieve the ambitious target.

The *Road to Zero* strategy briefly mentions reviewing the Warrant of Fitness and Certificate of Fitness systems to ensure that the current vehicle fleet is as safe they can be. The NZAA supports this as vehicle safety technology has changed significantly since the current inspection system was designed.

As above, the NZAA also recommends that investment is made in upgrading the Motor Vehicle Register, to also record comprehensive details of vehicle features (including safety equipment) so that we have much better data about the fleet and vehicles involved in crashes, and also to collect owner email and cellphone details so they can be targeted for safety interventions e.g. recalls (amongst other things).

Below are our specific comments on the proposed immediate actions:

Raise safety standards for vehicles entering the fleet

The NZAA supports initiatives to improve the safety standard of vehicles entering the fleet, but it is not as straight-forward as simply banning 1- or 2-star vehicles as not all cars have safety ratings, or comparable ratings. Close consultation with the vehicle industry is needed to develop an effective policy. An alternative approach, whilst developing a credible system that would facilitate banning unsafe vehicles from entering the NZ fleet, might be to impose minimum safety features, such as the ESC standard, and work should be underway to consider what is the next feature to mandate, such as AEB. Another approach could be a rolling age ban, although this does not guarantee vehicles would have all the desirable safety equipment – whilst prohibiting high-specification older cars. All these options should be investigated and modelled, with specific focus on the Japanese new and used car market, which dominate NZ vehicle imports.

Promote the availability of vehicle safety information

The NZAA fully supports this proposal – we have been advocating for the mandatory display of safety ratings at the point of sale (and at vehicle rental companies).

We also recommend that MoT work with websites like TradeMe to develop a tool so that people looking to buy a car can identify the safest vehicle for their specific needs. Currently, it is not possible for users to easily compare the safety ratings of cars listed under their chosen criteria (e.g. price or age), and nor can they specify safety ratings as one of the search parameters.

The biggest challenge for this is the current safety ratings available are confusing for consumers and are often in conflict with one another e.g. Suzuki Swift 5-star ANCAP vs. 1- or 2-star UCSR depending on year. However, this was effectively resolved through the development of ACC's Vehicle Risk Rating (VRR) scheme which was a merger of both, but is now scrapped. We suggest investigating the suitability of remodelling the VRR scheme to develop a user-friendly credible system for educating motorists about the safety of their vehicle including at POS.

Further, there are two options to consider in how to display ratings at the POS: either a dedicated star-rating label like the EECA fuel economy label, or a revision of the Consumer Information Notice (CIN). The CIN could contain additional details such as specific safety equipment like ESC or side-curtain airbags. A review of the CIN is overdue and we encourage this to be undertaken as part of this action.

4.3 Focus Area 3: Work-related road safety

Support best practice for work-related road safety

The NZAA supports these initiatives, including improving the collection data around work-related driving, and recording work purpose in CAS. Where possible, and particularly in respect of Serious Crash Unit-investigated crashes, it would be valuable to record additional data like length of time the driver had been driving and working prior to the crash, and whether it was a company-owned vehicle.

The NZAA would support initiatives to encourage more businesses to adopt vehicle telematics as part of “best practice” work-related road safety management, along with electronic logbooks.

We also think there is scope for more emphasis on contracting rules and safety practices for delivery vehicles and vehicle choice for tradespeople and small businesses.

Encouraging private sector initiatives to establish best practice road safety in the supply chain also needs to be supported through legislation and enforcement. For example, the 'chain of responsibility' regulations which apply in Australia and the United Kingdom.

Strengthen commercial transport regulation

The NZAA supports this initiative, but a key is not just strengthening regulatory settings, but to strengthen *enforcement*. Currently there are far too many grey areas in the legislation that hinder the success of prosecution of non-compliant commercial operators, and more clarity is needed along with more resources for enforcement of commercial operators and drivers.

4.4 Focus Area 4: Road user choices

NZAA Members see this area as the most critical for improving road safety.

Almost every fatal or serious crash involves a shortcoming of some type by the people involved – whether through reckless and extreme behaviour or people simply making mistakes – and getting more people to make better choices on the roads would significantly reduce crashes.

Yet the *Road to Zero* strategy has little focus on driver education, making safe choices, or up-skilling, instead focussing on strengthening the other pillars of the *Safe System*, to either prevent a serious crash, or minimise the injuries in the event of one. While the NZAA accepts this approach, the lack of driver interventions in this strategy is at odds with what the public expect to see the new strategy focus on. Failing to address this will simply see the public clamour to address the driver problem grow, especially if there is no measurable reduction in the road toll in the short term. The strategy's statement that "even if everyone obeyed the road rules *all the time*, it would only reduce road deaths by 50%", shows just how many lives could be saved by focusing on ensuring better compliance from drivers.

The NZAA suggests that as part of the *Road to Zero* strategy, there needs to be education to inform the public why it focusses on the other pillars of the safe system – and why not investing in skill and behaviour will deliver better value for money in terms of meeting the strategy target.

While the NZAA strongly supports this focus area and the immediate actions that it proposes, we believe there is the need to do significantly more in this space. The action to enhance drug driver testing has its own consultation process underway so we do not need to comment further. The NZAA supports the general focus of the other three immediate actions of prioritising road policing, supporting motorcycle safety and reviewing financial penalties and remedies. Like elsewhere in the strategy, we found there was a lack of detail about what the actions could involve that makes it difficult to provide specific feedback.

Prioritise road policing

The AA supports highly-visible road policing as a key component of road safety and agrees with having a clear programme focused on the areas of highest risk but it is concerning that there is no commitment to increase the amount of road policing above current levels. Achieving the strategy's ambitious targets without substantially increased investment in road policing would seem difficult.

Review of financial penalties and remedies

The NZAA supports a thorough evaluation of the fines and financial penalties to ensure they are fit-for-purpose, consistent, reflect risk and act as an effective deterrent. Currently there are

penalties for non-safety offences like bus lane infringements or parking in a disabled carpark that are the same as safety offences like running a red light. These inconsistencies do not clearly signal to motorists the safety risks of some offences and may instead be perceived as revenue gathering.

More research is also needed to understand who is receiving the traffic infringements – are most being issued to a large number of individuals making occasional mistakes, or a small cohort of recidivist offenders?

The NZAA also supports investigating alternative penalties for recidivist speeders including trialling speed awareness courses such as are run in the UK.

Support motorcycle safety

The NZAA supports initiatives to improve motorcycle safety, including making roads motorcycle-friendly, and we also support expanding the reach of ACC's *Rider Forever* programme to upskill riders of all abilities.

One initiative we would like the MoT to investigate is introducing clear guidelines in the Land Transport (Road User) Rule permitting lane-splitting (aka lane filtering) on congested multi-lane roads, such as has been introduced in NSW and in the UK. In NZ the rules on lane splitting are unclear and not specifically referenced in the Road User Rule, yet motorcyclists carry out this practice. From their perspective, it makes sense to lane split in slow-moving or stationary traffic to reduce travel time, but without clear guidelines this behaviour is not practiced consistently, and not all road users are aware of it or understand it, which could risk rider safety. Clear guidelines in the Road User Rule could then be properly promoted to all road users – so that motorcyclists can be educated on safe filtering practice, and so drivers know when to expect it – and properly enforced. We think there are safety merits in exploring this and would like this to be added to the MoT's work programme and considered for inclusion in the first action plan under the new strategy.

Additional actions

Alongside the four immediate actions listed in the consultation documents, we urge the Government to do more in the road user choices area through more actions targeting impaired driving, restraint use, driver training and cellphones.

Some of the additional actions the NZAA would like to see included in the *Road to Zero* strategy under this focus area are:

- Delivering on the Government's promise to provide professional driver training and education for all secondary school students
- Returning the amount of alcohol testing to previous levels
- Increasing assessment and rehabilitation for drunk or drugged drivers through the justice system to address substance abuse problems
- Develop clear and comprehensive data on speeding offences. In particular, what proportion of tickets are being issued to recidivist offenders
- Create a comprehensive plan to target cellphone distraction

4.5 Focus Area 5: System management

While this area does not contain the direct actions that people think of in terms of preventing crashes it is the essential engine that enables everything else to take place. Without effective system management, leadership and coordination it will be difficult to achieve significant progress, so the NZAA agrees with the focus area being included in the strategy.

The NZAA supports the action to strengthen system leadership, support and coordination and endorses the range of aspects it includes but we believe there are some other measures that need to be part of the strategy.

As noted before, New Zealand's outdated Motor Vehicle Register database has been a drag on the sector for some time and this can hamper many initiatives to improve safety. We need to replace this system with a modern one that will allow better information capture and data sharing.

It has been a concern to the NZAA to see the MoT ending some long-running surveys in recent times, like the previously annual speed survey and seatbelt wearing observational survey. Reporting of data and information has also become slower and lessened from what it was in the past, precisely at a time when it would seem to be needed more.

One of the key concepts of a Vision Zero approach is having excellent data, research and analysis to be able to target measures most effectively and measure how well they are working. There is great room for improvement here but it also needs adequate resourcing from the Government to take place.

Whilst the proposed target is ambitious, the NZAA supports having a target and regular monitoring. Whereas other countries that have adopted the 'Vision Zero' principle have not actually met their interim targets, they have had meaningful reductions in their crash rates, particularly fatalities, and regular monitoring enables them to review and adjust their strategies as appropriate.

The NZAA saw post-crash care as a glaring omission from the last road safety strategy so it is very welcome to see it included this time and we would support it having even more emphasis. There is a huge opportunity for better coordination and sharing of information to help ensure people involved in a crash get rapid, expert care that can make a major difference to their chances of surviving and recovering.

Conclusions

The *Road to Zero* strategy has an ambitious target, and the NZAA is supportive of the principles and general objective of the strategy. However it is short on detail and the immediate actions are neither a surprise nor significant. We await the subsequent action plan which we will need to be more comprehensive. The draft strategy also lacks detail on the level of resourcing and funding needed to achieve the target, despite modelling having been done to show how the target can be achieved over a decade. If we are to achieve similar reductions in fatal and serious injuries as in other leading road safety countries, then we will need to see similar levels of investment in all pillars of the *Safe System* as they have done. We suggest the final strategy, along with the subsequent action plans, should be explicit as to how much resources, and where and when they will be applied, will be needed to achieve the target.

Appendix 1: International comparisons

Road deaths

Green cells indicate reductions of 30%+.
Red cells indicate increases.

Change in numbers of road deaths for EU nations vs NZ		
	2001-2010	2010-18
Greece	-33%	-45%
Cyprus	-39%	-18%
Belgium	-43%	-31%
Denmark	-41%	-31%
Switzerland	-40%	-29%
Norway	-24%	-49%
Sweden	-50%	+22%
UK	-47%	-4%
Ireland	-48%	-31%
Netherlands	-41%	+6%
NZ	-18%	0%

- <https://etsc.eu/projects/pin/>

Many European nations (where the world's road safety leaders are found) have achieved reductions in road deaths of 40%+ inside a decade so far this century, so it is achievable. It must be acknowledged though that, compared to NZ, most of the EU nations have more high-standard highways, more modern vehicles, more intense driver training and a slightly older driving age.

Change in number of road deaths, Australian states vs NZ		
	2001-10	2010-18
Victoria	-35%	-26%
South Australia	-23%	-32%
Tasmania	-49%	+6%
ACT	+19%	-53%
NSW	-23%	-12%
Queensland	-23%	-2%
West Australia	+17%	-18%
Northern Territory	0%	0%
NZ	-18%	0%

- <https://www.bitre.gov.au/statistics/safety/>

Australian states have not achieved as large reductions in road deaths as the European leaders but Victoria, South Australia, Tasmania and ACT have had 30+% drops within a decade.

New Zealand's poor performance from 2013 onwards means it lags behind every Australian state apart from the Northern Territory and West Australia.

Serious injuries

Change in numbers of serious injuries for EU nations vs NZ		
	2001-2010	2010-17
Greece	-47%	-59%
Cyprus	-42%	-34%
Belgium	-37%	-33%
Denmark	-48%	-15%
Switzerland	-28%	-18%
Norway	-32%	-7%
Sweden	n/a	-6%
UK	-39%	+9%
Ireland	-60%	+72% (up til 2016)
Netherlands	+19%	+9%
NZ	-6%	+22%

Progress in reducing serious injuries has diminished in Europe this decade, with only three countries achieving drops of 30%+ and two of those having been hit hard by the global financial crisis.

If we go back to the previous decade however, seven of the nations listed managed reductions of 30%+ and an argument could be made that New Zealand is in a similar place now to where some of those nations were in the early 2000s.

In absolute terms, New Zealand has made no progress on reducing the number of serious injuries since 2001 but, considering the 32% increase in vehicle kilometres travelled over that period, there has been a slight reduction in relative terms.

Change in number of hospitalisations, Australian states vs NZ	
	2008-16
Victoria (TAC hospitalisation claims)	+27%
NSW	+9%
NZ	+ 7%

- <https://www.tac.vic.gov.au/road-safety/statistics/tac-hospitalisation-reports>
- <https://roadsafety.transport.nsw.gov.au/index.html>

Different jurisdictions categorise serious injuries differently so direct comparisons between New Zealand and elsewhere are imperfect and not all Australian states have data easily accessible. While Victoria and New South Wales have reduced road deaths, hospitalisation figures from road crashes over the most recent comparable decade show they have struggled to make progress in this area.

Appendix 2: Population and VKT trends

The projected population in 2030 by Statistics NZ is 5.475m and the three scenarios below are based on what would be required to achieve the targeted road deaths of 230 per annum depending on different levels of VKT.

	BAU VKT <i>Per capita VKT in 2030 at the same level as 2017</i>	Low VKT <i>Per capita VKT in 2030 at avg of 2013-17</i>	Extra low VKT <i>Per capita VKT in 2030 at 2012 levels (lowest point this century)</i>
2030 Population	5.475m	5.475m	5.475m
Road deaths	230	230	230
Total VKT	55b	52.2b	49.9b
Road deaths per billion km	4.2	4.4	4.6

Not all countries capture the data to calculate road deaths per billion km travelled but, of those that do, there were nine nations with a rate of death below 5 in 2016.

Barring New Zealand's population growth stalling or a massive reduction in VKT, achieving the number of road deaths aimed for in the strategy will require New Zealand to have the level of road safety in 2030 that Germany or the Netherlands currently has.

In recent times New Zealand's rate of road deaths per billion VKT has only been below 7 once. That was in 2013 when it reached a level of 6.2.

These calculations illustrate how big a task achieving the strategy's target will be for road deaths (let alone serious injuries), and that it will require much, much greater commitment and actions than the country has ever done before.

- <https://www.stats.govt.nz/tools/interactive-population-pyramid-for-new-zealand>
- <https://transport.govt.nz/mot-resources/transport-dashboard/2-road-transport/rd086-vehicle-kilometres-travelled-by-region-billion-km/rd015-vehicle-kilometres-travelled-by-all-vehicles-billion-km-and-per-capita-km/>