

# **SUBMISSION BY THE CHARTERED INSTITUTE OF LOGISTICS AND TRANSPORT IN IRELAND ON THE ROAD SAFETY STRATEGY 2013-2020**

## **Introduction**

The Chartered Institute of Logistics and Transport in Ireland (“the Institute”) is the independent professional body for people engaged in logistics and all modes of transport. The Institute has some 900 members in Ireland and is part of an international body with 30,000 members worldwide. As a professional body, the Institute does not lobby on behalf of any sectoral interest, but seeks to take an independent, objective and considered view on matters of public policy.

The Institute welcomes the opportunity to respond to the consultation on the Road Safety Strategy for the period 2013 to 2020.

## **Well Done**

At the outset it is important to acknowledge the major progress that has been made in reducing road deaths during recent years. The fatality reduction targets set in the current Strategy have been more than achieved and the Road Safety Authority, the Gardai, local authorities, State agencies and road users themselves deserve to be congratulated on this singular achievement.

## **The Challenges Ahead**

There are many challenges ahead:

- We risk becoming victims of our own success. Having made so much progress in a short time, we may become complacent. The recent increase in road deaths is a timely warning of how easily and quickly trends can reverse.
- We may have done the easy part (“the low hanging fruit”) and achieving further reductions in casualty numbers may be more difficult and less culturally acceptable.
- There are continuing constraints in both public and personal finances. Less public funding is available to the RSA, the Gardai and road authorities to finance road safety activities. Household and company budgets are also tighter and this could result in slower vehicle renewal and reduced maintenance expenditure.
- We have yet to create an embedded road safety culture where actions like drink driving and speeding are wholly socially unacceptable.

## **The Targets**

The new strategy should continue to set challenging targets for the reduction of road deaths. We achieved the reduction target of 60 deaths per million population in 2009, three years ahead of plan. We have already reached the longer term target of 50 deaths per million. A lower target should therefore be set for the new Strategy and consideration should be given to other approaches to targets. Some countries have set themselves the goal of reducing road deaths by 50% over a particular period. This may be worth considering because of the longer timeframe proposed for the new Strategy. Another option that should be considered is a long strategic aim such as the Vision Zero as adopted by Sweden. This has an important psychological value in saying that killing people on our roads is not acceptable and any death is a societal failure. Another approach which might be considered is a target which relates to our safety performance vis-à-vis other countries. It is already used very effectively to assess Ireland's international competitiveness. For example we could aim to be in the top 10% of IRTAD countries. Benchmarking ourselves against countries which have been most successful in improving road safety may also be helpful.

Progress on reducing serious injuries has been less impressive and the new Strategy should adopt a specific and challenging target in this regard. There should be a particular emphasis on this injury target in the new Strategy, drawing attention to the impact of car crash injuries on individuals, their families, the economy and society, something which is less well understood by the public. A greater focus on reducing injuries may also have benefits in relation to road deaths.

### **More of the Same and Some Game Changers**

The current strategy has been very successful and we are clearly doing something right. We should build on this success by doing "more of the same". This term is often used in a disparaging way, but it is the bedrock that keeps many systems safe and reliable. If the measures we have pursued have worked, we should retain them and embed them for the longer term. We need to guard against complacency. Messages will need to be constantly repeated and reinforced. Resourcing will need to be maintained. Enforcement will need to be retained at a high level and suitably targeted. Updating of practices will be necessary in some cases.

We should also consider a small number of "game changers", measures which have a major impact on public attitudes and behaviour. An example of this was the introduction of penalty points or in other sectors the ban on smoking in workplaces and the plastic bag levy. For example, more effective action in relation to driving under the influence of drugs might be a potential game changer in the new Strategy.

### **Importance of Direct Language**

We need to continue and enhance the use of direct language and avoid the use of euphemisms when we talk about road safety. We should speak about road crashes rather than accidents, deaths and serious injuries rather than fatalities and casualties. We also need to work to banish terms such as joyriding and boyracers from our lexicon. They are more appropriately called deathriding and deathracers.

The trend towards more direct unambiguous messages in advertising and promotional activities is welcomed and encouraged by the Institute.

### **Priorities for the New Strategy**

There should be a continuing high level of priority for measures to reduce **speeding** and **drink driving**. The focus should be on promotion, education and above all targeted enforcement rather than new legislative measures.

Increased attention needs to be given to tackling driving while under the influence of **drugs**, whether prescription or illegal. Some countries have adopted a zero tolerance approach, particularly to the presence of illicit drugs. Since our resources are limited, continuing cooperation with international efforts to find better ways of testing for drugs will be of major importance.

There should be a greater focus on **commercial drivers and vehicles** (buses and goods vehicles). One in five crashes involve commercial vehicles and the consequences can be catastrophic, as in the case of a major bus crash. We welcome the publication of legislation to reform road worthiness testing for commercial vehicles and the publication of the joint RSA/HSA guidelines on driving for work. However we note with concern that commercial vehicle compliance with speed limits is poor and that almost half of all vehicles checked have defects, many of them so serious that they warrant immediate action. The current difficult economic and trading conditions may tempt some operators to defer vehicle replacement or skimp on maintenance. The Institute recommends:

- promotion of a comprehensive approach to safety by commercial vehicle operators, based on better systems, processes and staff training leading to the development over time of a robust safety culture;
- early and full implementation of the new commercial vehicle testing arrangements;
- a substantial increase in the number and intensity of roadside checks of vehicles and drivers;
- continuing review of vehicle and driver standards in cooperation with our EU partners;
- promotion of improved training of drivers and vehicle maintenance staff and encouragement of companies to take a greater interest in safety: those companies which have developed and implemented inhouse safety programmes for their employees have obtained significant economic benefits as well as the wider social and reputational benefits;

- improved record keeping relating to both driver and vehicle safety, including staff training, vehicle maintenance and incident reporting;
- effective systems to monitor driver and vehicle performance to provide early warning of emerging issues and as a way of promoting continuous improvement;
- linking a driver's PPS number to the tachograph as a way of addressing safety concerns about excessive driving time.

The Institute suggests that consideration be given to the introduction of mandatory inhouse testing of safety critical employees for alcohol and drugs. There is already a statutory obligation on railway undertakings to undertake such testing and it is a legitimate to ask why it does not also apply to road passenger transport. We accept that there may be practical difficulties in implementing such a regime in small companies, but that is not sufficient reason for declining to consider it.

**Distracted driving** requires continuing attention. Surveys have shown that mobile phone use while driving is a problem. It is likely to increase as mobile devices are now in universal use and their applications are becoming more extensive and sophisticated. Stronger promotional activities are needed to highlight the dangers and higher penalties to reinforce the message. Consideration should be given to stronger penalties for learner drivers and for drivers of passenger vehicles, possibly extending to mandatory disqualification in serious cases. It is truly terrifying to see a bus driver or a parent with children in the car using a mobile phone while driving. The consequences of even a moment's inattention could be catastrophic. People should be encouraged to use their own mobile devices to record and report serious incidents that they observe.

The Institute would support an increased emphasis on **vulnerable road users**. We welcome the work that has already been undertaken and would encourage an intensified effort. We recommend the following:

- greater promotional, educational and advertising efforts to draw attention of all road users to the risks to both pedestrians and cyclists on our roads;
- measures to emphasise that roads are shared spaces for all road users not just vehicles – this is particularly important in residential areas, shopping streets, city and town centres and especially on rural roads which have no segregated provision for cyclists and pedestrians;
- implementation of better cycle priority measures, involving physical segregation from mechanised and pedestrian traffic as far as possible;
- tackling increasing encroachment by cyclists and parked vehicles on footpaths through better enforcement and information campaigns – it is sharply reducing safety and convenience for older and mobility impaired pedestrians;

- information and education activities emphasising that pedestrians and cyclists have responsibilities as well as rights, for example not jaywalking, not cycling on footpaths or through traffic signals, ensuring high visibility.

Investment in low and medium cost **engineering counter-measures** and on **road maintenance** needs to be sustained. The Institute has a real concern that spending on these measures will be reduced as roads budgets decline because of the continuing constraints on public expenditure. It is Institute policy that, in the current difficult circumstances, public expenditure should be focussed on the maintenance and renewal of existing transport infrastructure and on getting the best use out of existing infrastructural assets. This has a resonance for road safety also. Attention to the maintenance and renewal of roads will undoubtedly have safety benefits. The returns from engineering counter-measures are generally very high and this investment therefore provides good value for money as well as reducing deaths and injuries at a low financial cost. A continuing programme of **measurement of road condition** is very important and facilitates the identification of potential accident locations and the prioritisation of remedial measures.

Good **signposting and marking of roads** has both safety and traffic benefits and needs to be well maintained and enhanced where possible. Signposting and marking provide vital driver information and guidance, as well as being a critical component of law enforcement. Signposting and marking needs to be approached from both an engineering and a psychological perspective. Greater consideration should be given to using signing and marking effectively to influence driver behaviour, for example the low speed zones through villages and small settlements on major roads or by using signs to warn drivers of the transition from urban roads to rural hinterland roads which they share with cyclists, pedestrians and slow moving agricultural traffic. Signposting of **speed limits** should be regularly reviewed to make sure that the limits accurately reflect the classification, location and physical characteristics of the particular road. Special consideration should be given to the deployment of temporary speed limits during roadworks or where abnormal road conditions prevail.

The **motorway service areas** programme should be completed without delay. Good rest facilities help to reduce driver fatigue on long journeys.

**Technical standards for roads** should be reviewed at regular intervals to ensure that they are satisfactory from a safety perspective, as should the guidelines relating to traffic and safety arrangements at roadworks. These reviews should take particular account of road crash reports and relevant local and international experience and research. Safety arrangements at roadworks and other activities carried out on public roads by third parties need to be effectively overseen and enforced by local authorities.

The maximum possible use should be made of appropriate **technology** to enforce and encourage road safety. **Speed cameras** should be increasingly deployed as they are an effective enforcement tool and they represent a way of releasing Garda resources for other enforcement work. Camera detection at dangerous junctions or coupled with low speed zones in villages should be considered. The digital **tachograph** should be seen as a valuable law enforcement tool and employers should also be encouraged to make better use of tachograph data in their own internal safety strategies. The role of **alcolocks** should be considered. Some jurisdictions require them to be fitted to certain categories of vehicle, for example school buses. Others use them as a sentencing option where a driver is convicted of drunk driving, requiring a person to fit one to their vehicle or offering it as an alternative to a driving disqualification. Electronic devices are also available which monitor driver performance which could have particular applications for young drivers or commercial drivers. Consideration should be given to their potential as tools to influence behaviour, for example some insurance companies may be prepared to consider premium reductions or they may be of value as part of a company safety strategy.

The Institute supports and encourages the excellent **educational initiatives** targeted at schools from primary through to third level, such as the back to school campaign each Autumn, the Streetwise module in CSPE and wrecked.ie aimed at 17-24 year olds. This work should be continued and intensified as it influences future drivers at a critical point in their development.

Consideration should be given to the establishment of an **independent crash investigation function** as recommended as far back as 2006 by the EU Expert Group on Accidents in the Transport Sector. The purpose of such investigations should be to establish the cause of crashes and to learn lessons, not to attribute blame. These investigations should not only look at the immediate causes of crashes but also at the underlying factors, thereby hopefully getting a greater insight into the design, social engineering and deterrence measures likely to prevent a recurrence. There is ample precedent for this type of investigation in the aviation, maritime and railway sectors. There is a notable contrast between the approach to crash investigation in these other sectors and in road transport, yet many more people are killed on our roads every year than in the other three sectors combined. There is also a contrast with the approach to occupational accidents which are routinely investigated by the HSA.

It is not practical to investigate all road crashes in this way, but we can look to the approaches taken by the relevant agencies in other countries such as the National Transportation Board in the United States, BEA-TT in France and the Swedish Accident Investigation Authority. For example, the NTSB investigates those incidents which “*have a significant impact on the public’s confidence in highway safety, generate high public interest and media attention or highlight national safety issues*”. As well as investigating incidents with wide ranging safety significance, it

also carries studies based on accident trends. This type of approach need not have major resource requirements and it may even be possible to avail of the services of some recently retired people with the necessary skills. The results of these investigations, coupled with some modest research and relevant international studies, would help better target our road safety effort and ensure better value for money from safety-related expenditure. It would also be useful to encourage our third level educational institutions to increase their research effort in road safety. This could include modest research commissions or financial support for relevant post-graduate work.

The **deathracing** problem (formerly known as boyracing) requires continuing attention through a combination of effective enforcement and deterrence, education and outreach and by finding alternative leisure activities for the young people involved.

### **A Constant Learning Experience**

There is no single right way of improving road safety; it is a constant learning experience. Here are a number of suggestions, some of them obvious:

- As a small country we have a limited capacity to conduct or support major safety research and development. We should therefore beg, borrow and steal from others, learning from both their successes and failures. We should continue actively to participate in the relevant international fora. We can derive major benefits from the modest costs involved in active participation.
- Examine why the successful countries are doing well and learn from their experience. It is also important to learn from poor performers who have started to improve.
- Be prepared to experiment. We are often slow to try new things because of a fear of failure. But failure is an important part of the learning process.
- Establish professional fora on particular topics and themes. These fora could bring together experts in a particular area to share their experiences, successes and failures. They could operate under the Chatham House Rule, thereby encouraging people to be open and frank. They could be face to face or web-based.

There is a lot of expertise in the Institute in Ireland and worldwide. If there are any issues on which the RSA wants an input, we will do what we can to help.

### **A Cultural Change**

An overarching theme for the new Strategy might be how to achieve a cultural change in attitudes to road safety. A number of such changes have been achieved in other dimensions of Irish society. For example, attitudes to smoking, particularly in shared spaces, have changed enormously in recent years. Our approach to

domestic waste has also changed and we now happily recycle, reuse and segregate our rubbish, though we still have some way to go with respect to litter. Is it possible to achieve a similar change in respect of road safety? By the end of the decade will drunk driving and speeding be seen as socially unacceptable activities? There is probably no single “silver bullet” answer to this; it is just a case of continuing with a combination of educational, promotional and enforcement activities which in time will lead from grudging compliance to acceptance and active endorsement.

### **Political Consensus**

The Irish political system tends to be very adversarial. When you reach a target, the Government claims credit for it. When you fail, the Opposition criticises the Government. Road safety is too important to be treated in this way. When preparing the new Strategy, the RSA should work to create a supporting political consensus. It should engage with Oireachtas Committee on Transport and Communications, and perhaps more widely with members of the Oireachtas, during the preparatory process. It should also engage with the representative associations of local authorities and local authority members. The opportunity for input must be real and politicians need to feel they are having an influence, thereby hopefully creating a greater sense of ownership. The RSA might also propose to Government that the new Strategy be formally endorsed in each House, following a debate.

### **Chartered Institute of Logistics and Transport in Ireland**

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