

Transport Professionals Association response to the Federal Government's Consultation Regulatory Impact Analysis (RIA)

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About Transport Professionals Association

Transport Professionals Association is the peak industry body for transport professionals spanning multiple disciplines, including planning, engineering, modelling, economists, policy specialists, and researchers who work across government, consultancy, industry and academia. We have close to 3,500 members and serve a wider transport professional community of more than 6,000 professionals across the country.

Transport Professionals Association supports members through professional development, networking, advocacy, and knowledge sharing as they deliver safe, sustainable, and thriving transport systems.

To assist with this, Transport Professionals Association has adopted a Policy and Principles Platform that addresses how we will advocate on behalf of the broader transport community for the creation of successful transport systems. The Transport Professionals Association Policy and Principles Platform is provided as Attachment 1 to this submission. See transportprofessionals.com.au for further information.

Introduction to submission

The Transport Professionals Association (TPA) welcomes the opportunity to make this submission in response to the Federal Government's Consultation on Regulatory Impact Analysis (RIA) regarding the proposal to reduce default speed limits outside of built-up areas. This submission is made in alignment with the TPA's Policy and Principles Platform (PPP), which commits our members to advancing evidence-based, integrated, and equitable transport solutions that support healthy people, communities, and economies across Australia.

The TPA asked for submissions and interest from its members to form a small working group to respond to this consultation request. This response is the culmination of the discussion and review of the document by approximately ten of the TPA's members, who represented the broad industry that TPA serves from local and state government through to private consultants and academics, across multiple jurisdictions.

As can be seen from the discussion points in the subsequent sections there is a broad range of opinions and thus the discussion points are intended to summarise the key issues raised. The TPA group has responded to the RIA by grouping our responses according to the eight questions posed by the RIA:

- Does the RIA adequately identify and define the problem?
- Are there any other problems not considered by this RIA?
- Does the RIA establish a case for amending the default speed limits in the ARR?
- Does the RIA present clear, well differentiated options that can achieve the stated policy objective?
- Which of the options analysed have the ability to meet the stated objectives? How could these be enhanced?
- Are there any other feasible options to address the problems identified in the previous chapter that have not been assessed in the RIA and should be considered?
- Of the options discussed in this chapter which would be the most effective at achieving the stated objectives and why?
- Which is your preferred option and why?

The overall findings from the group's discussion is that the proposed changes to default speed limits may have significant implications for transport system outcomes across Australia. These include impacts on the following key topics of concern for TPA:

- Safety (by aiming to reduce road trauma),
- Sustainability (through potential changes in emissions and fuel consumption),
- Efficiency (affecting travel times for people and freight),
- Inclusivity (influencing access for regional, rural, and remote communities),
- Resilience (the ability of the network to adapt to new rules and conditions), and
- Impact on place (shaping the character and economic vitality of regional, rural, and remote areas).

While the RIA's proposals may support improved safety and environmental outcomes, they also present challenges. If not carefully designed and implemented, changes to speed limits could reduce mobility, economic opportunity, and social inclusion, particularly in remote and regional areas. Conversely, well-targeted reforms have the potential to make it easier for transport systems to deliver on the TPA's vision of 'healthy people, communities, and economies' by balancing safety, accessibility, and efficiency for all Australians.

The following sections summarise the findings of our group's discussion.

1. Does the RIA adequately identify and define the problem?

- While the RIA provides a comprehensive overview of road safety trends and the rationale for government intervention, many team members felt that the problem is not fully defined.
- There was concern that the statistics and modelling lack the precision needed to isolate where non-urban accidents occur and whether there is a specific crash problem on rural roads with default speed limits (sealed or unsealed).
- Several of the group noted the need for more granular analysis of crash data by road type and distance traveled, as well as consideration of factors such as road geometry, traffic volumes, and local conditions.
- Some members acknowledged that the RIA identifies a fundamental mismatch between road design, operating speed, and survivable crash forces, but others felt the analysis is too generic and does not sufficiently address regional variations or the broader social and economic context.

2. Are there any other problems not considered by this RIA?

The team identified several additional issues not fully addressed in the RIA:

- The RIA's reliance on scenario-based modelling rather than real-world data.
- The potential for decreased driver skill post-lockdown and the impact of urban drivers driving in unfamiliar rural environments.
- The lack of discussion on enforcement challenges and the behavioral aspects of compliance.
- The omission of broader road safety factors such as road maintenance, signage, and medical facilities in remote areas.
- The impact of reduced speed limits on mobility, especially in remote areas where focal points (towns, rest stops, etc.) are far apart, potentially increasing travel times to the point where some journeys become impractical.
- Economic effects on local communities and tourism due to increased travel times.
- The need for research into typical journey types (e.g., deliveries, itinerant work) and their sensitivity to speed limit changes.

3. Does the RIA establish a case for amending the default speed limits in the ARR?

There was a divergence of views within the team.

- Some members believed the RIA makes a strong case for aligning default speed limits with Safe System principles, citing the positive benefit-cost ratios and international evidence.
- Others argued that the modelling and economic analysis are not sufficiently connected to real-world scenarios, and that the social and economic impacts, particularly for regional and remote communities, are not analysed closely enough. The consensus is that more research and direct consultation with affected communities are needed as part of the implementation of the amendment of the default speed limits.

4. Does the RIA present clear, well differentiated options that can achieve the stated policy objective?

The RIA presents distinct options for sealed and unsealed roads, with varying degrees of speed reduction. However, several team members felt that the options are not sufficiently contextualized to account for local conditions, and that the rationale for preferring intermediate options is not well explained. There were also concern that the options are not linked to a broader system of road improvements or regionalisation, and that the potential for tailored, locally appropriate solutions is not fully explored.

5. Which of the options analysed have the ability to meet the stated objectives? How could these be enhanced?

Most team members agreed that, in theory, all options could contribute to improved safety outcomes. However, the effectiveness of any option depends on its implementation, including public education, enforcement, and improved data collection. Complimentary enhancements measures suggested include:

- Direct consultation and surveys with affected communities, businesses, and tourists.

- Targeted infrastructure upgrades and signage improvements.
- Consideration of regional differences and the acceptability of risk in different social contexts.
- Complementary non-regulatory measures such as communication campaigns.

6. Are there any other feasible options to address the problems identified in the previous chapter that have not been assessed in the RIA and should be considered?

The team proposed several additional options:

- A more targeted system of road improvements, including better data collection on vehicle kilometres travelled and crash numbers for default speed limited rural roads.
- Broader use of signage to tailor speed restrictions to local conditions.
- Comprehensive assessment of rural roads with posted speed limits based on clear criteria.
- Non-regulatory options such as infrastructure upgrades and behavioural interventions.

7. Of the options discussed in this chapter which would be the most effective at achieving the stated objectives and why?

There was no single consensus, but several members favoured an initial reduction to 80 km/h for sealed roads, as it balances safety benefits with efficiency and is likely to be more socially and politically feasible. Others argued for retaining the current 100 km/h default until more thorough research and consultation are conducted. The effectiveness of any option is seen as contingent on its alignment with local conditions, community acceptance, and the integration of supporting measures such as enforcement and education.

8. Which is your preferred option and why?

Preferences varied amongst the group:

- Some members support an 80 km/h default for sealed roads, citing safety and efficiency.
- Others prefer maintaining the 100 km/h default until more detailed research and direct community consultation are completed.
- For unsealed roads, there is support for a lower default (e.g., 70 or 80 km/h), with some advocating for the Queensland approach of not setting a default but allowing drivers to “drive to conditions.”
- There is a strong consensus that any change should be preceded by robust research, direct engagement with affected communities, and a staged, evidence-based implementation.

9. Are the objectives as expressed above appropriate?

Most team members agree that the objectives of improving road safety and aligning speed limits with Safe System principles are appropriate. However, some responses suggest that the objectives could be broadened to include considerations of regional equity, economic impact, and community acceptability. There were also notes that the objectives should also reflect the need for practical implementation and enforcement strategies.

10. Are the lists of costs and benefits considered in this methodology sufficient to capture the costs and benefits of the proposed change?

The team expressed concern that the methodology may not fully capture all relevant costs and benefits. In particular, the economic and social costs of reduced mobility in remote areas, potential impacts on tourism, and enforcement costs were seen as underrepresented. Some members suggested that the benefits of improved safety are well articulated, but the broader economic and social dimensions require more detailed analysis.

11. Do the scenarios considered capture the full range of uncertainty about the costs and benefits of the policy?

Several responses noted that while the scenarios provide a useful framework, they do not fully capture the uncertainty inherent in real-world implementation. The reliance on modelling rather than empirical data was highlighted as a limitation. Members suggested that additional sensitivity analyses and alternative scenarios such as staged implementation or region-specific approaches could improve the robustness of the findings.

12. Are there any additional data that ought to have been considered when constructing the baseline FSI, VKT, efficiency and fuel costs?

The team identified several data gaps, including more granular crash data by road type, regional travel patterns, and

vehicle usage in remote areas. Some members recommended incorporating data on freight movements, tourism travel, and seasonal variations. There was also a call for better integration of local government data and community feedback into the baseline assumptions.

13. Is the approach to measuring the impact of policy change appropriate? Where assumptions have been made, do you have any specific alternative assumptions that ought to have been considered?

While the general approach is methodologically sound, many members felt that the assumptions used particularly around compliance rates, travel behaviour, and economic impacts require further scrutiny. Alternative assumptions are suggested including lower compliance in remote areas, greater sensitivity of travel times for essential services, and differentiated impacts by region. Members also recommended validating assumptions through pilot studies or real-world trials.

14. Are there any additional regulatory burdens that have not been considered?

The team highlighted potential regulatory burdens related to enforcement, signage updates, and community education. Some members noted that local governments may face increased administrative and financial responsibilities. There was also concern about the burden on regional police and transport agencies to monitor and enforce new limits effectively.

15. Are there any additional impacts on competition that have not been considered?

A few responses raised the issue of competitive disadvantage for regional businesses that rely on efficient transport. Reduced speed limits could affect delivery times, logistics costs, and access to markets. Members suggested that the RIA should consider how changes might influence competition between urban and regional operators, and whether mitigation strategies are needed.

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Attachment 1: Transport Professionals Association Policy and Principles Platform