

SUMMARY OF SUBMISSIONS

NOVEMBER 2009



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EXECUTIVE SUMMARY

This document summarises the submissions received from general public and stakeholders on the Safer Journeys discussion document.

More than 1,500 submissions were received on the Safer Journeys discussion document (general public about 1,400 and stakeholders almost 130). In addition, more than 1,200 members of the general public and almost 20 key stakeholders have ranked the 62 initiatives outlined in the discussion document. This is a much higher number of submissions than was received on the Road Safety to 2010 strategy (about 800).

Ranking of initiatives

Some of the most controversial initiatives received strong support from submitters (ie they were highly ranked), including initiatives about lowering the legal Blood Alcohol Concentration (BAC) limit, raising the driving age and changing the give way rule. A few initiatives gained high support from submitters but are not strongly supported by policy and research, like the introduction of compulsory third party insurance (ranked 1st).

In general, submitters placed more emphasis on initiatives that fall within the dimension of Safe Road Use than on roading, vehicle, or speed initiatives. This might indicate that submitters are more focussed on the driver, rather than the other three elements of the safe system.

General comment on the discussion document

The following comments were made:

- Vision: The vision for road safety is not strong enough; there should be a more ambitious long-term vision and road safety targets.
- Safe system: Strong support from stakeholders for a safe system approach.
- Priority areas: Walking/cycling and fatigue should be areas of high priority.
- Funding: For the proposed initiatives to be successful, the government will need to ensure that the necessary resources, including funding, be made available.
- Focus on motorised road transport: The discussion document is too focussed on a "roading business as usual approach." It "fails to consider cycling, walking and passenger transport as being integral parts of the system."
- Focus on the driver: We need to raise the competence of drivers and change New Zealand's negative driving culture through enhanced training. Education programmes were also requested: "[The driver] is where all road safety programmes must start. A competent driver will always adjust their driving according to the vehicle they are driving and to the standard of the road they are driving on."
- Enforcement and compliance: A lack of focus on enforcement and compliance was mentioned throughout the different priority areas. Submitters thought that repeat offenders especially should be penalised more rigorously.

Comment on the discussion document initiatives

- Alcohol and drugs: A significant number of general public submitters emphasised the wider problems caused by alcohol and drugs and wanted actions such as restricting access to alcohol and drugs, placing more responsibility on people or organisations that supply alcohol, and providing treatment for alcoholics and addicts.
- Young drivers: There was strong support for raising the driving age, extending the learner licence period and making the restricted licence test harder to encourage more supervised driving practice.
- Roads and roadsides: There was strong support in the submissions for changing the give way rule for turning traffic. Submitters were also particularly concerned about high risk rural roads.
- Speed: Many general public submitters commented that speed is not the underlying problem: "There is too much focus on speeding and not enough on good driving." Training, education and driving to the conditions were mentioned as more important than lowering speed limits.
- Motorcycling: The most popular initiative overall was improved rider training and licensing, with many additional comments regarding making professional training more widely available or even compulsory.
- Vehicles: Submitters commented that the focus needs to be on the driver rather than the vehicle. Too much technology or other insulating factors would mean greater risk taking by drivers.
- Walking and cycling: Improving the walking and cycling infrastructure was mentioned frequently.
- Fatigue: There was support for this priority area with the roadside stopping places and information initiatives receiving the most support.
- Distraction: Although there was strong support for this priority area, submitters were concerned about enforcement as a response.
- Restraints: There was strong support for bringing the New Zealand child restraint laws in line with international best practice.
- Older New Zealanders: All initiatives were supported, though the education and engineering approaches were especially popular.
- Education: A majority of general public submitters thought that there is not enough emphasis on road safety education.

INTRODUCTION

This document summarises the submissions received from the general public and stakeholders on the Safer Journeys discussion document.

Consultation process

The Safer Journeys discussion document was launched on 18 August 2009. The consultation period closed on 2 October 2009.

During the consultation period, Ministry of Transport (Ministry) officials attended over 40 meetings across New Zealand, including Regional Transport Committee meetings and meetings with road safety coordinators and specific interest groups like walking and cycling advocates. Ministry officials attended and the Minister of Transport presented on Safer Journeys at the NZ Traffic Institute (Trafinz) conference in Auckland on 7–10 September 2009.

The Safer Journeys website contained an online forum, where people could exchange their views on the different priority areas and Safer Journeys in general. Almost 400 people joined the forum and posted more than 1,000 notes. The Ministry did not actively participate in the forum but acted as a moderator, to ensure that no inappropriate information was posted.

How we raised awareness

Both a full and a summary version of the Safer Journeys discussion document were made available throughout the consultation period (printed and online). They were also handed out to stakeholders at the launch of the document, and available at meetings and presentations held during this time.

Key road safety stakeholders were consulted with before the development of the discussion document, and they received copies of the discussion document as soon as it was released. The Ministry's stakeholder engagement team worked with stakeholders across the country to highlight the consultation to ensure they were aware and prepared, should they want to make a submission.

The consultation was promoted on the Ministry of Transport website both before and during the consultation period. A highly visible logo on the homepage of the website, as well as a simple web address (www.saferjourneys.govt.nz), was designed to make the web pages easy to find.

To help promote the consultation, the Ministry worked with its road safety partners, the NZ Transport Agency, Local Government New Zealand, ACC and the New Zealand Police (Police). This involved having links from their websites to the Ministry's; including updates in their regular newsletters; and continuously sending out strong messages for the New Zealand public to take part and have their say in road safety. The Ministry also worked closely with the Ministry of Youth Development to ensure engagement with young people. As a result, a youth version of the Safer Journeys discussion document was developed and focus groups were held with a variety of young people. The Ministry of Youth Development submitted a report on behalf of all the young people it engaged with.

Police, the New Zealand Transport Agency and ACC were keen to promote the consultation, and as a result 40,000 flyers were distributed with the Safer Journeys web address highly visible.

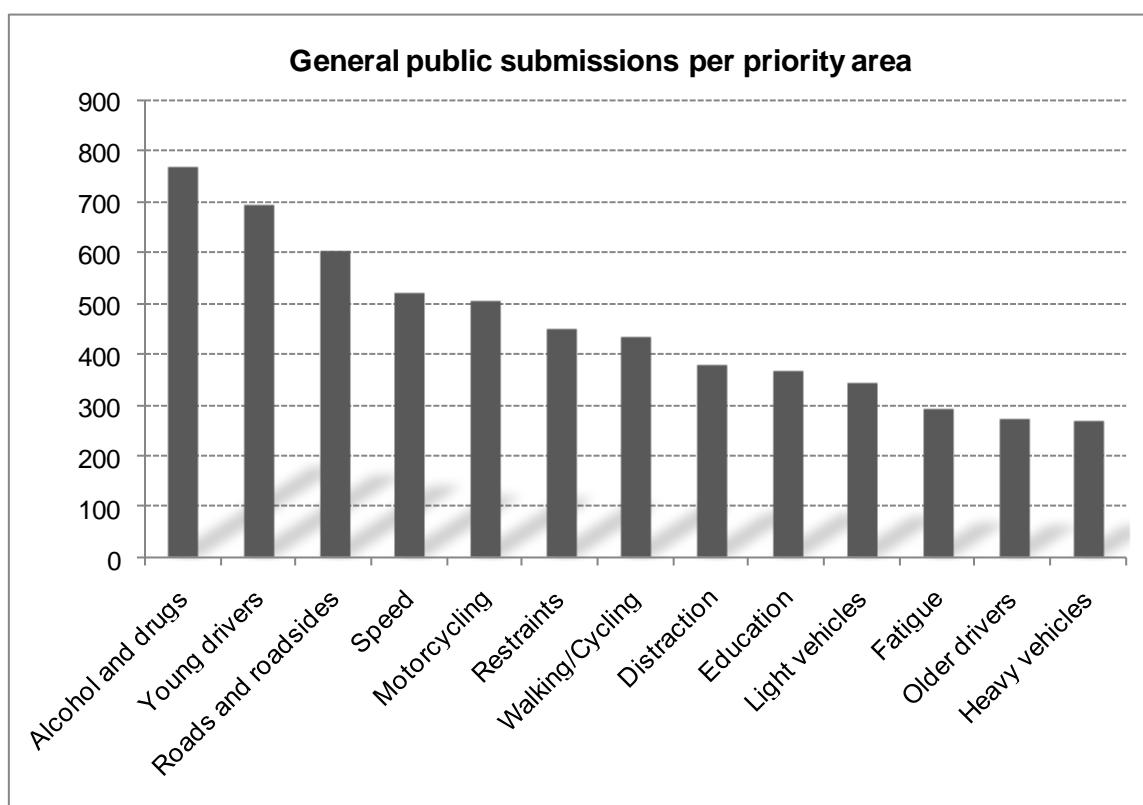
To further promote the consultation to the wider public, a national and local advertising campaign started shortly after the consultation began. National newspaper advertisements ran in three Sunday papers, as well as the Christchurch Press and Otago Daily Times. In Wellington and Auckland advertisements ran in key community newspapers. Regional newspapers were also used, with advertisements running in Northland, Waikato, Rotorua, Taranaki, Bay of Plenty, Gisborne, Hawke's Bay, Manawatu, Nelson, Marlborough, Greymouth and Southland. An online advertising campaign was also run in conjunction with the print advertisements, on both www.stuff.co.nz and www.nzherald.co.nz.

SUBMISSION PROCESS

New Zealanders are concerned about road safety and have made an effort to submit their views as part of the Safer Journeys consultation process. Many of the submitters have quoted personal experience in their submissions, like the loss of a family member in a road crash or being involved in a dangerous situation as a car driver or cyclist. More than 1,500 submissions were received from a wide range of individuals and organisations. More than 1,400 members of the general public submitted their views on the discussion document, either via the Safer Journeys website or via email and mail¹. Almost 130 key stakeholders and other (bigger) organisations² have given their feedback.

General public submissions

The graph below shows the number of general public submissions received for each priority area:



¹ The Safer Journey website allowed partial submissions on specific areas of the discussion document. Because of this, the total number of general public submissions is higher than the number of submitters (1,404 members of the general public made a total of 1,536 submissions). For this summary all submissions made by one person or organisation are treated as one submission.

² Some organisations have been treated as general public rather than key stakeholders.

In addition the following feedback was received:

- More than 1,200 submissions were made to the Law Commission on Alcohol and Drugs initiatives³
- 35 submissions received from the Children's Commissioner
- Input from Ministry of Youth Development (MYD), which carried out a specific youth consultation. A total of 786 individuals participated in the consultation and 17 groups with an unknown number of participants.⁴

Stakeholder submissions

The submissions received from stakeholders include those received from:

- Local Government NZ (LGNZ) and almost 50 councils (city, district and regional) and regional transport committees
- 15 road safety committees and other safety related organisations
- the NZ Automobile Association (AA) at national level plus some regional AA groups
- more than 10 district health boards and other health-related organisations (eg the Alcohol Advisory Council (ALAC) and New Zealand Drug Foundation)
- more than 10 representatives of specific parts of society (including Age Concern and Rural Women New Zealand)
- walking and cycling organisations
- organisations representing the motor industry and trade organisations (including Motor Industry Association, Road Transport Forum New Zealand and the Federation of Motoring Clubs)
- different research and engineer organisations (including the Institution of Professional Engineers New Zealand (IPENZ) and New Zealand Traffic Institute (Trafinz))
- other organisations (including the Bus and Coach Association, KiwiRail and Tourism New Zealand).

Ranking of initiatives

A total of 1,219 members of the general public and 18 stakeholders ranked the 62 initiatives outlined in the discussion document. To get an indication of whether the results of this ranking are representative of the total population, the NZ Transport Agency (NZTA) commissioned an additional survey⁵ (see Appendix 1 for the results

³ The submissions made to the Law Commission were made during its consultation period on the Review of Regulatory Framework for the Sale and Supply of Liquor. At the time of preparing this summary of submissions on Safer Journeys, the results of the Law Commission consultation were not final, thus preliminary results have been used here.

⁴ MYD received 310 submissions in total: 264 from individuals and 46 from groups. There were 522 individuals who took part in 29 group submissions. The remaining 17 groups did not respond to the question regarding the number of individuals in their group.

⁵ The survey was conducted by Research International Ltd using an online method with a nationally representative sample of 1008 respondents during the last week of September 2009. Respondents were asked to rank the 62 initiatives firstly as of high, medium or low

of the rankings and the NZTA survey). This section summarizes the main results of the ranking done by members of the general public and compares these with the main results of the NZTA survey.

The main results of the ranking as part of the submission process

Some of the most controversial initiatives of the discussion document gained high support from submitters who ranked the initiatives. These include:

- “Introduce a zero BAC limit for certain drivers” (2nd)
- “Raise the driving age to 17” (3rd)⁶
- “Address recidivism through a zero BAC for repeat offenders and move towards mandatory alcohol interlocks for drink drive offenders” (5th)
- “Reduce the legal blood alcohol limit to 50 mg per 100 ml” (6th)
- “Change the give way rules for turning traffic and pedestrians” (10th).

A few initiatives gained high public support but are not strongly supported by policy and research, including:

- “Introduce compulsory third party insurance” (ranked 1st) and
- “Increase vehicle restrictions for young drivers (eg based on power, modified vehicles)” (4th).

In general, submitters placed more emphasis on initiatives that fall within the dimension of Safe Road Use than on roading, vehicle, or speed initiatives. Nine out of the public’s top ten initiatives concern alcohol/drugs and young drivers. Only seven of the public’s top twenty five initiatives were roading, vehicle or speed initiatives. These included:

- Safer Roads and Roadsides: “Change the give way rules for turning traffic and pedestrians” (10th)
- Safer Speeds: “Create more speed zones (80 km/h, 90 km/h) on high risk rural roads” (16th)
- Safer Roads and Roadsides: “Implement targeted programmes to address run off road, head-on and overtaking crashes on high volume high risk rural roads” (17th)
- Safer Speeds: “Change penalty system to deter speeding” (18th).

The emphasis on Safe Road Use in the rankings might indicate that submitters are more focussed on the driver rather than the other three elements of the safe system.

importance. On the respondent's screen, each of the initiatives appeared with a short explanation and with a reference to the appropriate section of the main Safer Journeys document for a fuller explanation, if it was needed. Up to 20 of the initiatives could be ranked as of high importance, and the respondents were then asked to further rank their high-ranked initiatives in order from 1 to 20. The rankings for all 62 initiatives from all respondents were used to produce an overall list in order of public preference.

⁶ Overall the proposal to raise the driving age to 17 was strongly supported and it ranked third overall. The proposal to increase the driving age to 16 was ranked at 26. If these two categories were combined, raising the driving age would have been the highest ranked initiative overall.

This suggestion is supported by the fact that there was strong support for initiatives relating to education, driver testing and training. Three initiatives in these areas ranked seventh to ninth:

- “Introduce random roadside drug testing” (7th)
- “Extend the learner licence period to 12 months” (8th)
- “Strengthen the restricted licence test to encourage 120 hours of supervised driving practice” (9th).

Two educational initiatives in the top 20 belong to the walking and cycling area:

- “Add specific walking and cycling questions into driver licence testing so drivers are more aware of pedestrians’ and cyclists’ needs” (13th)
- “Increase cyclist skills training in schools” (14th).

These rankings reflect a lot of interest and support from submitters in the walking and cycling area.

Comparison of the main results of the ranking with the NZTA survey

The results of the ranking completed as part of the submission process and the results of the NZTA survey are very consistent. The top 5 initiatives and 13 of the top 20 initiatives are the same, even if the specific rankings differ. The most striking differences between submissions and the NZTA survey results are:

- In the NZTA survey the initiatives related to children ranked higher than those ranked as part of the submission process. For example, “Bring our child restraint laws in line with best practice” ranked eighth in the NZTA survey, and was not in the top 20 of the submission rankings.
- In the NZTA survey, initiatives aimed at raising awareness ranked higher. For example, “Inform New Zealanders about the impact of alcohol on driving” ranked ninth.

GENERAL COMMENT ON THE DISCUSSION DOCUMENT

The priorities

General public

Over 900 submitters made comments not specifically related to the initiatives but about issues important to them such as the vision, and other ideas or initiatives.

Numerous submitters expressed concern over issues such as alcohol, speed, distraction, fatigue and young drivers.

There was not much comment on priority levels for the different areas (eg high or medium). The exception being a large number of comments suggesting that either fatigue or walking and cycling should be raised to a higher priority:

“Fatigue in particular is a key concern given New Zealanders’ long distance driving culture, and the issues with rest areas along key routes. We therefore suggest that consideration be given to elevating the priority for initiatives that address fatigue related crashes.”

A few submitters believed that there were risks associated with identifying too few initiatives. For example, if only 10 or 15 initiatives from a list of 60 or more were adopted, there would be a danger of overlooking the remaining 45 or 50 when they could possibly be achieved for very little cost and be more effective than some of the more popular high profile ideas.

Some submitters identified other priorities not included in the 13 proposed areas. A number of child advocate groups submitted similar or identical submissions, urging the NZTA and the Ministry to adopt best practice, evidence-based road safety measures to reduce the death and injury of children on the roads. Similarly, a number of submitters called for greater recognition of road safety for horse riders.

Stakeholders

Overall, the majority of stakeholders were in broad agreement with the identified priorities. However, as with the general public submissions, there were calls to elevate the areas of walking and cycling, fatigue and distraction to the high area of concern; and child restraints to the medium or higher area of concern. A number of stakeholders also urged for more emphasis to be placed on the importance of education and community programmes within the final strategy.

The vision

General public

A number of submitters considered that the proposed vision for road safety was not strong enough. In particular, the vision’s lack of target figures for reducing deaths and injuries attracted significant adverse comment. For example, it was submitted, that targets are a crucial part of strategy implementation and priority setting and, by contrast, it is not possible to measure performance or have any accountability without targets.

“International best practice (OECD: Towards Zero 2008) recommends bold visionary, ambitious vision statements and robust interim targets based on an agreed strategy. I am personally concerned that the vision statement “A safe

road system that is increasingly free of deaths and serious injuries” is not bold, ambitious and visionary.”

“The inclusion of targets and an accompanying action plan for set time periods during the life of the strategy will provide a measurement and incentive to work towards a goal. As the vision stands now, a reduction of just one death could be classed as contributing towards ‘a safe road system that is increasingly free of road deaths and serious injuries’. The fact that the targets included in the 2010 road safety strategy were not met is not a reason to exclude them from the next strategy.”

Some submitters urged that New Zealand should aspire to a more radical ‘Vision Zero’ strategy of the kind adopted in jurisdictions such as Sweden, Norway and Western Australia. The proposed vision was criticised for its lack of ambition and its acceptance of the inevitability of deaths and trauma on the roads.

“Whilst accepting that at a practical level crashes and therefore trauma are inevitable, we reject this as being acceptable at an aspirational vision level. That is, as an aspiration the vision should be focussed on eliminating death and trauma rather than accepting its inevitability. Zero is not a target to be achieved by a certain date. It is a change from an emphasis on current problems and possible ways of reducing these to being guided by what the optimum state of the road system should be” (p.1. Tingvall and Haworth, 1999).

A few submitters considered that the scope of the vision was too narrow and made no mention of wider safety issues, in particular vehicle emissions. It was argued that vehicle emissions cause more deaths every year than the road toll, and transport is a significant contributor to New Zealand’s greenhouse gas emissions.

“The omission of the costs of vehicle emissions, greenhouse gas emissions, and future energy price rises from the strategy is striking for a document so concerned with economic efficiency. We submit that “safety” be broadened to include vehicle emissions, including greenhouse gas emissions.”

A few submitters considered that any safety benefits from the proposed vision risked being accompanied by increased costs and diminishing marginal returns. It was proposed that further resources directed at road safety should be subject to a rigorous cost/benefit analysis.

Stakeholders

Although the general idea of the vision was supported by stakeholders, many stakeholders did not believe the vision was strong enough, often requesting a more ambitious long-term vision. Many argued that the vision lacked strong direction, a means to show progress or an implementation framework to back it up. It was submitted that a single reduction each year in road deaths can be considered as ‘increasingly free’. It was also submitted that the vision does not indicate the urgency for change or a proposed rate of change.

LGNZ argued that the current vision was not strong enough as it appears to accept some level of trauma, which LGNZ said was not acceptable at an aspirational level. LGNZ argued that a strong message is needed to show that deaths and serious injuries are no longer acceptable within the New Zealand road transport system.

The AA suggested that the vision should be inspirational and include targets and performance measures.

Safe System

General public

There were several submissions which endorsed the safe system approach.

“Too many people die on New Zealand roads and it is great to see the Government leading by example by making positive and practical suggestions about what can be done to make New Zealand roads, riders, pedestrians, drivers and passengers safer. I am encouraged by what has been proposed and there are many initiatives in the Safer Journeys document that I believe will have a real and lasting impact on New Zealand as a whole.”

Although supported, there were requests that the safe system approach be integrated with engineering, enforcement and education solutions or aligned with other government policies that may impact on road safety.

However, some aspects of the safe system approach came under criticism. For example, a few submitters took issue with the notion of having ‘five-star users in five-star vehicles on five-star roads at five-star speeds’. It was argued, for example, that five-star roads would encourage higher speeds, while features of five-star cars such as electronic stability control could lead to drivers having a false sense of security.

A few submitters believed the systems approach to road safety treats priority areas as stand-alone issues when these cannot be dealt with in isolation from other societal factors. For example, it was submitted that drink driving cannot be dealt with by the transport sector alone, and that addressing the underlying social problems such as alcohol abuse, would be likely have more benefits than more enforcement.

Stakeholders

The safe system approach was generally supported, although some stakeholders questioned not using the three Es (education, enforcement and engineering) approach. Largely, the safe system approach was welcomed for encouraging the whole community to view road safety as a high priority. There were a lot of comments on how the proposed safe system approach was described, and it was suggested it should be closer to that described and used internationally, and considered best practice.

LGNZ argued that the proposed system approach differs to that used internationally (which identifies human tolerance to physical force as central to the safe system). LGNZ recommended modifying the safe system to that of international best practice, and to reflect the ongoing importance of three Es.

The AA suggests New Zealand currently has an enforcement based paradigm or focus, and believes we need a new information paradigm for a long-term safety strategy. This paradigm would be based on clear injury reduction aims; would be research led and evidence based, with clear funding following research, and would assume road safety is everyone’s responsibility, and that the more everyone knows about road safety the better.

Other comment general public

Focus on motorised road transport

One of the most commonly made criticisms of the safe system approach was its focus on cars and trucks and its lack of emphasis on public transport; sustainable forms of transport such as walking and cycling; and other modes of freight transport, in particular rail and sea. Those submitters argued that the strategy is based on the premise that that road use will increase when they believed it should aim to reduce the current number of vehicle trips made.

“A further weakness of the “systems approach”... is that it fails to consider cycling, walking, and passenger transport as being integral parts of the system. They appear as add-ons – in fact the safety of passenger transport users makes no appearance at all. A “transport system” includes non-vehicle modes of transport and passenger transport. “

More focus on the driver

One theme that came across strongly in submissions was that there should be more focus on the driver. It was argued that driver error featured overwhelmingly in crash statistics.

“We begin our recommendations with emphasis on the driver as this is where all road safety programmes must start. A safe competent driver will always adjust their driving according to the vehicle they are driving and to the standard of the road they are driving on.”

“In essence, [the safe system approach] diminishes the responsibility of drivers and signals that it is the job of others to implement systems that compensate for poor driving habits.”

There were numerous references to the culture and attitudes of New Zealand drivers. It was noted, for example, that driving should be ‘a privilege not a right’.

“The ... important topic of developing a positive road safety culture is not mentioned. We need to develop a society where driving is taken seriously, where people want to be safe and do not want to risk the lives of other people, both inside and outside their vehicle, by their driving. Much of this comes down to simple consideration and thoughtfulness.”

“Using public roads is a responsibility – too many people have a cavalier attitude when using public roads – they think they have a right to drive and ride as they see fit, observe or not observe road rules as they see fit, and forget about their responsibilities to other road users and the community in general.”

With a view to raising the competence of drivers and changing the driving culture, a number of submissions placed considerable emphasis on driver education and training. Some called for ‘continuous driver improvement’, ‘whole-of-life education’ and a focus on ‘upgrading the driver’.

Several submissions called for more rigorous driver training and testing. Measures suggested included:

- requiring all learner drivers to undergo a minimum number of hours of practical experience with a qualified instructor
- psychological testing
- compulsory AA driving assessments every 10 years
- restricting motorcycle riders to the type of machine they can drive until they have logged 100+ hours of incident-free driving
- improvements in the road code to include more safety information and a greater emphasis on courteous/cooperative driving practice.

Others expressed concern about the driving standards of 'foreign', 'tourist' or 'international' drivers. This was partly based on a perception that overseas drivers had inferior driving standards and should therefore be subject to testing or refresher courses. However, there was also recognition that overseas drivers might be unfamiliar with New Zealand road rules.

Enforcement and compliance

Another criticism of the safe system approach raised by many submitters is that it does not have enough focus on enforcement and compliance. Some submitters expressed concerns about inadequate policing. Measures suggested included:

- the Police should take a 'zero tolerance' approach
- a nationally coordinated programme should be established that improves targeting of road safety enforcement to risks identified by road authorities, communities and police
- more unmarked Police presence
- allowing the public to submit evidence of illegal behaviour (video evidence of speeding, running red lights, dangerous driving) for Police to carry out a prosecution
- stricter enforcement of the rules in relation to keeping left when travelling slowly
- more enforcement targeted at drivers crossing the centre line.

A number of submitters proposed changes in penalties and sanctions to encourage compliance. These included stronger penalties for drink drive offences, repeat offenders and illegal street racers, including confiscation and crushing of vehicles.

Other comments by stakeholders

Funding

A common thread within the stakeholder submissions was a request that, for the proposed initiatives to be successful, the government ensures the necessary resources (including funding) be made available. This acknowledgement was particularly prevalent in the council submissions. The need for adequate resourcing was identified for areas such as enforcement, community programmes, Travel Demand Management schemes, Road Safety Coordinator work programmes, education, renewal and maintenance, and tailoring national campaigns to the regional level.

SUBMISSIONS ON THE DISCUSSION DOCUMENT INITIATIVES

The following section gives feedback on the initiatives in the discussion document. For each initiative a summary of general public and stakeholder feedback is given, as well as a summary of other initiatives suggested in submissions.

Please note when reading these summaries:

- The ranking of the initiatives was used as the primary source for support for initiatives. This was because many submitters did not answer 'yes' or 'no' but made comments instead.
- Where submitters did clearly support or oppose an initiative, they often did not provide reasons why. When comments were provided, it was often to explain why they did not support the initiative.
- In many cases submitters from the general public did not comment on all initiatives or questions asked in the discussion document. Submitters often concentrated on specific priority areas or specific questions within an area.

Not all stakeholders submitted on all priority areas or all initiatives. It was common for stakeholders to make most of their comments on specific priority areas. This was because organisations acknowledged their respective area of expertise. The tables below provide specific stakeholder comment when their view either differs from the general stakeholder view or adds value to the general comment. Therefore not all stakeholder views are mentioned under the "Specific comment" heading.

The LGNZ submission represents the interests of all local authorities of New Zealand. While almost 50 individual councils or regional transport committees made separate submissions, the intention of the LGNZ submission is to present a "whole of local government view".

Alcohol/Drugs

(487 online + 282 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
<p>Reduce the legal adult blood alcohol limit to 50 mg per 100 ml (BAC 0.05) (ranked #6)</p>	<ul style="list-style-type: none"> • This initiative received the most comment from submitters. • The majority of submitters supported lowering the BAC. About 1 in 10 submitters suggested that the BAC should be zero for all drivers. • About one quarter of submitters who commented on Alcohol/ Drugs opposed lowering the BAC and would like it retained at the current level. Some of this opposition appears to have come from organised groups, including the hospitality industry. • Some common themes in submissions supporting this initiative included better alignment with Australia and other international jurisdictions and that the current limit allows people who are significantly impaired to drive legally. • Arguments against the lower BAC were that it penalised responsible drivers rather than focussing on the issue of repeat offenders who drive while well above existing limits. • A number of submitters also questioned what evidence there was to support lowering the BAC, suggesting that very few crashes were caused by those with BACs between 0.05 and 0.079. • Some submitters also suggested that there was a 	<p>General</p> <ul style="list-style-type: none"> • Strong support from majority of stakeholders to reduce BAC to 0.05. • Where there was not support, it was largely due to a perceived need for more research in this area. <p>Specific comment</p> <ul style="list-style-type: none"> • LGNZ: Although there was support from the majority of members, several rural members were strongly opposed. They argued that lowering the BAC without providing alternative transport choices would result in a reduction of mobility and social connectedness for members in rural communities. • AA: Opposed reducing BAC without a review and further evidence. • ALAC: Strongly supported this initiative. A legal BAC of 0.08 sends a message that it is okay to drink and drive, even at relatively low levels. • Candor⁷: Opposed lowering BAC because of lack of evidence. Suggested that a more objective analysis would lead to a different policy response. • Law Commission: Of the more than 1,000 submissions received, there was almost unanimous support for lowering the BAC to 0.05.

⁷ According to its website, Candor is a registered charity active in road safety since 2005. It has been started by the families of two women who died in drug related crashes. Its “overarching objective is to reduce the high occurrence of impaired driving in NZ”.

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
	poor understanding of current limits.	
If the legal blood alcohol limit is lowered, then introduce infringement penalties for offences between BAC 0.05 and BAC 0.079 (ranked #22)	<ul style="list-style-type: none"> This initiative received a low level of response from submitters. Of those who responded, it was strongly supported. Reasons for supporting it were that it would provide a “wake up call” or second chance. 	<p>General</p> <ul style="list-style-type: none"> Support <p>Specific comment</p> <ul style="list-style-type: none"> ALAC: Supported introducing infringement penalties for offences between old BAC levels and the proposed new BAC, so as to not impose an additional workload and costs on New Zealand Courts.
Maintain the legal blood alcohol limit at BAC 0.08 and increase the severity of penalties (this is an alternative to lowering the BAC to 0.05) (ranked #15)	<ul style="list-style-type: none"> A low number of submitters commented on this initiative. Of those that did, the initiative was strongly supported. 	<p>General</p> <ul style="list-style-type: none"> Only a small number of stakeholders supported this initiative, preferring it to lowering the BAC to 0.05. <p>Specific comment</p> <ul style="list-style-type: none"> ALAC: Did not support the initiative as it ignores the international body of evidence and research that supports a lower BAC.
Introduce a zero BAC limit for certain drivers (drivers under 20 years, adults without a full licence, commercial drivers) (ranked #2)	<ul style="list-style-type: none"> Nearly all the submitters who commented on this initiative supported it. Comments varied as some submitters wanted the zero limit to apply to some but not all of the suggested groups. The most support was for a zero limit for under 20 year olds. Among those who opposed this initiative the main reason was the belief that a zero limit was impractical. 	<p>General</p> <ul style="list-style-type: none"> Largely supported. <p>Specific comment</p> <ul style="list-style-type: none"> AA: Supported, but called for a 0.02 tolerance to cover testing errors and an administrative penalty for a BAC between 0.02 - 0.05. Candor: Supported retaining the current limit for under 20 year olds but suggested that this should be extended to include all drivers lacking a full license and first offenders.
Address recidivism through a zero BAC for repeat offenders and move towards mandatory alcohol interlocks for drink drive offenders	<ul style="list-style-type: none"> This initiative was strongly supported by those submitters who commented on it. Most of the comment related to alcohol interlocks. Submitters felt that these are the best way to deal with recidivists, although some were concerned that these could be bypassed and would be expensive to implement. 	<p>General</p> <ul style="list-style-type: none"> Largely supported. <p>Specific comment</p> <ul style="list-style-type: none"> NZ Drug Foundation: Argued that providing treatment to recidivist drink drivers should be priority for government. Argued that additional funding for assessment and treatment services is urgently required.

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
(ranked #5)		Supported interlocks, but felt more testing was needed before implementation.
Introduce random roadside drug testing (as technology allows) (ranked #7)	<ul style="list-style-type: none"> • This initiative received the second greatest number of comments in this area. • The introduction of roadside drug testing was strongly supported by submitters. • Reasons included that drugs are as dangerous as alcohol and readily available. • Those who opposed or were not sure about random drug testing were mostly concerned about the accuracy and methods that would be used. Some submitters felt that it would be an infringement of their civil liberties. 	<p>General</p> <ul style="list-style-type: none"> • Largely supported. <p>Specific comment</p> <ul style="list-style-type: none"> • NZ Drug Foundation: Supported but depending on technology available. However, the detection of drug use at any level (essentially zero tolerance) rather than drug impairment could result in charges for unimpaired drivers. • MYD consultation findings: There were concerns from youth about how people would be randomly tested for drugs and the degree to which a person might be 'violated' (eg would it require a urine or blood sample on the spot?). The details would need to be made clear.
Inform New Zealanders about the impact of alcohol on driving (ranked #47)	<ul style="list-style-type: none"> • More education and advertising regarding the effect of drugs and alcohol on driving was strongly supported by submitters. • There were significant differences in how people thought this should be achieved with some submitters supporting education targeted at particular groups, and many supporting greater education through schools or at licensing. 	<p>General</p> <ul style="list-style-type: none"> • Largely supported. <p>Specific comment</p> <ul style="list-style-type: none"> • AA: Significantly expand funding to make early alcohol and drug intervention (ie assessment, education, rehabilitation and treatment) more readily available to the Courts.
Promote the use of alcohol interlocks, particularly to commercial drivers, employers and the parents of young drivers (ranked #42)	<ul style="list-style-type: none"> • See comments above for the initiative "Address recidivism through a zero BAC for repeat offenders and move towards mandatory alcohol interlocks for drink drive offenders". • Although largely supported, there were some concerns about the possibility that people could tamper with the devices. 	<p>General</p> <ul style="list-style-type: none"> • Largely supported, particularly for recidivist drivers as it will help in improve enforcement. • When this initiative was not supported, a lack of evidence to justify the cost was often the reason given. <p>Specific comment</p> <ul style="list-style-type: none"> • NZ Drug Foundation:

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
		Supported, but wants more testing before implementation.

Other suggested initiatives frequently mentioned

General public

- A significant number of submitters focussed on the wider problems caused by alcohol and drugs. They wanted moves to restrict access to alcohol and drugs, place more responsibility on people or organisations supplying alcohol, and to provide treatment for alcoholics and addicts involved in driving offences.
- A large number of submitters wanted improvements in enforcement and strongly supported increasing penalties, particularly for repeat offenders. Many felt that recidivists' cars should be confiscated or crushed.
- About one in ten submissions suggested that some form of alternative transport was needed to prevent drink driving. This included suggestions of improving public transport, subsidising taxis and courtesy vans, or making it a requirement for pubs (especially in rural areas) to provide transport for patrons.
- A number of submitters suggested that people needed to know when they were over the limit. The provision of breathalysers in pubs was seen as one solution to this.

Stakeholders

- AA: Saw a need to increase enforcement of unlicensed drivers to ensure it is an effective sanction. Called for increased police power to confiscate, impound or wheel clamp vehicles or invalidate licence plates of those who reoffend.
- NZ Drug Foundation: Requested that providing treatment to recidivist drink drivers should be a priority.
- Candor: Generally wanted stronger sentencing provisions.

Young Drivers

(463 online + 233 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
<p>Raise the driving age to 16 (ranked #26) or Raise the driving age to 17 (ranked #3)</p>	<ul style="list-style-type: none"> • These were the most commented on initiatives. Respondents strongly supported raising the driving age. There was greater support for raising the driving age to 17 than to 16 years. • Reasons for supporting an increase to the driving age were that people at 16 or 17 would have more maturity for correct decision making, 15 and 16 year olds were too young to be driving a car, 17 year olds were at a better stage of brain development and the differences between risk-taking in young men and women. • Many submitters who opposed raising the driving age were concerned that increasing the age would reduce the ability of parents to influence driving behaviour, particularly if combined with longer periods in licensing. This was reinforced by the comment that parents make better driving models than university flatmates. • Comments were also made about synchronising the driving age with the school leaving age to allow those participating in work/apprenticeships not to be unduly effected. • The importance of mobility was raised by a large number of submitters. • Comments were made on the need to support the rural community if these changes were made. 	<p>General</p> <ul style="list-style-type: none"> • Majority support for raising the driving age to 16 or 17 years. Aligning with school leaving age was the most popular reasoning. <p>Specific comment</p> <ul style="list-style-type: none"> • LGNZ: although receiving some support from rural areas, the majority of rural members were opposed (due to long distances between residences, employment opportunities and the dangers of walking and cycling). • NZ Institute of Driver Educators: Requested that the learners driving age remain at 15 years, but to increase the time period for learner licences to 12 months.

<p>Extend the learner licence period to 12 months (ranked #8)</p>	<ul style="list-style-type: none"> • A majority of submitters supported this initiative. About 1 in 4 submitters who commented were opposed. • Reasons for supporting the initiative included suggestions that this was a way to get the experience needed particularly when combined with more professional training. • Other submitters felt that stronger testing in this area combined with greater enforcement/punishment would bring about change. 	<p>General</p> <ul style="list-style-type: none"> • Majority support.
<p>Strengthen the restricted licence test to encourage 120 hours of supervised driving practice (ranked #9)</p>	<ul style="list-style-type: none"> • Fourth equal in popularity. • Experience partnered with professional training received significant support from submitters. 	<p>General</p> <ul style="list-style-type: none"> • Support, although some questioned the expense this may impose on young drivers. <p>Specific comment</p> <ul style="list-style-type: none"> • LGNZ: Supported increasing the hours of supervised practice before one can obtain a restricted licence.
<p>Increase the benefit of approved professional driver training courses (eg allow these to be taken in the learner licence phase and replace the time reduction for completion with another incentive) (ranked #12)</p>	<ul style="list-style-type: none"> • While widely supported, cost was seen as a significant limiting factor in this area, which would need to be addressed. • Some suggested free training would have benefits later. • Others suggested professional driver training would break “genealogical” bad habits. 	<p>General</p> <ul style="list-style-type: none"> • Strong support, although stakeholders often added that the New Zealand school curriculum is already at capacity. <p>Specific comment</p> <ul style="list-style-type: none"> • AA: Supported promoting and encouraging the importance of professional instruction. • TERNZ: Supported, but argued more research is needed to develop best practice driver education and training in New Zealand, that supports the development of driving skills, knowledge and attitudes.
<p>Impound vehicles of those who breach Graduated Driver Licence System (GDLS)</p>	<ul style="list-style-type: none"> • Mixed support. • The only major concern was impoundment of other cars not owned by the offender eg the family car. 	<p>General</p> <ul style="list-style-type: none"> • Mixed support from those who commented on this initiative.

license conditions (ranked #11)		
Increase vehicle restrictions for young drivers (eg based on power, modified vehicles) (ranked #4)	<ul style="list-style-type: none"> • The majority of submitters who commented on this initiative supported it. • Reasons for opposition included concerns about difficulty in administering and enforcing restrictions, the impact on single car families and a preference for better driver training. 	<p>General</p> <ul style="list-style-type: none"> • Mixed support.
Introduce compulsory third party insurance (ranked #1)	<ul style="list-style-type: none"> • When asked directly, there was almost unanimous support for this suggestion, with many seeing it as a way of modifying poor driving behaviours. • Minority dissent, mostly based around cost, and the belief that the insurance cover would insulate drivers from the 'real cost' of road crashes. 	<p>General</p> <ul style="list-style-type: none"> • Mixed support. • Some suggested that the discussion document did not provide enough information on the benefits and costs and enough proof that it would have an impact on youth driver behaviour. <p>Specific comment</p> <ul style="list-style-type: none"> • AA: Remain convinced that this will add cost, duplicate existing mechanisms, and be impractical and ineffective in New Zealand. Recommended progress be made by working with the insurance and vehicle finance industries.
Increase the benefit of school road safety education by developing a specific road safety education programme in secondary schools (ranked #19)	<ul style="list-style-type: none"> • Education was a consistently popular solution across all initiatives including education for younger drivers. • Many suggested the need for hands-on skills, while others suggested greater school/State/curriculum involvement. 	<p>General</p> <ul style="list-style-type: none"> • Strong support.
Raise awareness of young driver crash risk and the need for the Graduated Driver Licensing	<ul style="list-style-type: none"> • This initiative did not receive widespread comment, most likely due to the specific questions around education. • Many considered that younger drivers are risk takers and suggested methods to prevent risky behaviour, rather than 	<p>General</p> <ul style="list-style-type: none"> • Strong support. <p>Specific Comment:</p> <ul style="list-style-type: none"> • MYD consultation findings: Emphasised the need to teach people about the 'machine' they drive and how

System (ranked #31)	educating.	it works in order to stress the importance of safety.
If the driving age were raised and the learner period extended, do you think there should be an exemption for rural youth who can demonstrate, by way of a practical test, that they have the skills and attitudes to drive safely and competently	<ul style="list-style-type: none"> • There was approximately two-to-one voting against this suggestion. • Concerns were over natural justice, enforceability and consistency. • Some commented that if this was a preferred option then it would have to be used judiciously, with strong guidelines and training. • There was general sympathy for the needs of rural families in this situation, and it was suggested that travel alternatives would need to be developed before raising the driving age could be implemented appropriately. • Some thought that it could have work/cultural/social impacts for the whole rural community. 	<p>General</p> <ul style="list-style-type: none"> • Majority against. • Those in support were mostly rural based organisations and/or Councils in rural areas. Reasons for support included social interaction, sporting activities, lack of employment opportunities, and limited alternative transport options. <p>Specific Comment:</p> <ul style="list-style-type: none"> • MYD consultation findings: Questions were raised regarding how 'rural youth' would be defined. There was concern that some young people might use false addresses to obtain such an exemption.

Other suggested initiatives frequently mentioned

General public

- Harder and wider testing: There was strong support for a wider or harder testing programme. Many people felt that the current approach, sometimes described in submissions as 'scratch and win', was inappropriate. They argued that only with a short test was impossible to adequately assess skills, and that drivers should consider and practise a wide variety of scenarios including rush-hour driving, night, and wet or icy conditions. Related suggestions included:
 - follow up assessment after 12 months to correct bad habits
 - continual retesting throughout the lifetime of the driver.
- The use of drugs and alcohol by young drivers also received wide comment, including the suggestion of returning the drinking age to 20 years; and the need for stronger education.

Stakeholders

- AA: Suggested compulsory attitudinal education courses before drivers can progress to a restricted licence, and that a full driver licence be automatically granted after a set period of time to drivers with no demerit points against their name.

Roads and Roadsides

(432 online + 263 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
<p>Implement targeted programmes to address run off-road, head-on and overtaking crashes on high volume high risk rural roads (ranked #17)</p>	<ul style="list-style-type: none"> • This initiative received the second highest number of submissions in this priority area. • Submitters strongly supported constructing more and longer passing lanes, widening of roads and installation of more 'rumble strips'. Submitters believe this will reduce head-on and overtaking crashes. • Submitters consistently argued that median barriers are needed on roads to keep vehicles travelling in opposite directions apart. • About one in ten submissions that commented on this initiative supported removing roadside objects. Submitters believed that these provide distraction and could be dangerous if hit at speed. • Submitters supported a better quality roading network. Support was especially strong for better bitumen, paint and drainage systems to stop surface flooding. Other ideas included better road edge design and additional slow vehicle passing bays. 	<p>General</p> <ul style="list-style-type: none"> • Strong support, although the lack of funding for local roads, as opposed to State highways, was referred to. <p>Specific comment</p> <ul style="list-style-type: none"> • LGNZ: The support for this initiative was predictably split between rural and urban members. Rural members focussed on improving high risk/volume rural roads while urban members focussed on improving high risk urban roads.
<p>Support a targeted programme for high risk urban intersections (ranked #21)</p>	<ul style="list-style-type: none"> • Of those who responded, the need for speed controls such as traffic lights and roundabouts was strongly supported by submitters. • Submissions supported the introduction of more controlled intersections (linked to intersection design). • One in four submitters who submitted on this initiative believed that greater emphasis on walking and cycling and intersection education (road code) would 	<p>General</p> <ul style="list-style-type: none"> • Strong support. <p>Specific Comment</p> <ul style="list-style-type: none"> • LGNZ: As above, this initiative was supported by urban members.

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
	<p>assist in improving safety at urban intersections.</p>	
<p>Change the give way rules for turning traffic and pedestrians (ranked #10)</p>	<ul style="list-style-type: none"> • There was strong support from submitters for changing the give way law for turning traffic. Many believed change is overdue. • Submitters believed that the law is confusing, people are not following the law at the moment due to ignorance or bad driving, and the rule can cause confusion with tourists. • Where there was no support, submitters saw the current law as already being easy to understand, and therefore a waste of resources to change. • There was support not to change the give way rule in regard to pedestrians — particularly as changing the law could lead to complacency amongst pedestrians. 	<p>General</p> <ul style="list-style-type: none"> • Strong support. Some requested that this change not be extended to pedestrians. <p>Specific Comment</p> <ul style="list-style-type: none"> • IPENZ: Overall, a change to the rule would improve safety and intersection efficiency at little cost. But it was recommended that before change occurs, a thorough assessment of the possible operational side effects, particularly on traffic flows, be undertaken.
<p>Develop and support new approaches to safety on mixed-use arterials (ranked #36)</p>	<ul style="list-style-type: none"> • Of those submitters who responded, the need for roundabouts, limited speed zones, traffic calming mechanisms and intersection improvements was strongly supported. • Submissions also supported the reallocation of road space to include specific areas for buses and cyclists to use as well as a safe and maintained footpath network. • The general theme from the submissions was that a safe environment for all road users is very important. 	<p>General</p> <ul style="list-style-type: none"> • Strong support. <p>Specific comment</p> <ul style="list-style-type: none"> • LGNZ: Within the latest National Land Transport Programme, local government will not have the \$2.4 million indicated to build demonstration projects on urban/mixed use arterials. Relevant legislation must be amended.
<p>Implement treatments to make high risks roads more self-explaining (ranked #33)</p>	<ul style="list-style-type: none"> • There were no negative comments from submitters on this initiative. • Submissions supported the need for better road design, speed limits that better reflect the road, increased road width and better signage (a small number of submissions believed that road signs are 	<p>General</p> <ul style="list-style-type: none"> • Strong support.

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
	too reflective).	
Carry out more crash reduction studies and make these more targeted (ranked #53)	<ul style="list-style-type: none"> • A low number of submitters commented on this initiative. • Unanimous support for this initiative from all submitters. • Submitters believed that studies can help improve road design, and car technology. They believed the results would mean less crashes and fatalities. • There were no negative comments to this submission. 	<p>General</p> <ul style="list-style-type: none"> • Support.

Other suggested initiatives frequently mentioned

General public

- Submissions, particularly those from motorcyclists, supported the replacement of wire rope median barriers with barriers more suitable for motorcyclists.
- Submissions supported further investment into the local road and State highway network.
- Submissions believed that funding should target “black spot” areas first.

Stakeholders

- Additional funding is required through an increase in Funding Allocation Rates.
- Trafanz: there is a need for a well funded engineering programme focussed on improving safety.

Speed

(360 online + 161 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
<p>Increase the number of road safety cameras (ranked #45)</p>	<ul style="list-style-type: none"> The majority of submitters supported this initiative. Some submitters restricted their support, for example saying they only support cameras if they are highly visible, focus on dangerous speeds only or if they are installed at high risk locations. Submitters against this initiative argued that cameras would not have impact or are seen as a way of making money. The view was expressed that cameras target already safe roads. Another comment made was that speed should always relate to the conditions and that speed cameras do not consider the conditions. 	<p>General</p> <ul style="list-style-type: none"> Support. <p>Specific comment</p> <ul style="list-style-type: none"> AA: The AA argues that the attention speed receives from Safer Journeys is not warranted in terms of addressing road safety. Other issues such as distraction are more important. Speed enforcement must always be about road safety – never for revenue collection or simply to meet performance targets.
<p>Change penalty system to deter speeding (higher demerit points and lower fines) (ranked #18)</p>	<ul style="list-style-type: none"> Supporters and non-supporters were almost equal on this question, with a slight majority of submitters in support of the initiative. Submitters who supported this initiative thought that demerit points might be a greater threat and mean more to drivers than dollars. Some opponents thought that the current system works well, or that existing rules are harsh enough. There was also some support for higher demerit points and higher fines. 	<p>General</p> <ul style="list-style-type: none"> Support, largely because of the long-term effects of demerit points as opposed to financial fines. <p>Specific comment</p> <ul style="list-style-type: none"> LGNZ: Strongly supported reducing speed as a priority and suggest emphasis should be on improving the effectiveness of enforcement. MYD consultation findings: Concern was expressed by youth about the use of demerit points for speeding. They believed the person caught speeding may not be the car owner, therefore the car owner may be unduly punished.
<p>Create more speed zones (80 km/h, 90 km/h) on high</p>	<ul style="list-style-type: none"> The majority of submitters supported this initiative. Only a few submitters commented on why they 	<p>General</p> <ul style="list-style-type: none"> Mixed support. Some thought it was more effective to have a limited number of speed

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
risk rural roads (ranked #16)	<p>supported this initiative. Comments included that the roads are not made for the current speed limits or that current speed limits are too high.</p> <ul style="list-style-type: none"> • Reasons given for not supporting the initiative were too many different speed zones confuse drivers, and that drivers should focus on driving instead of keeping an eye on the speedometer. 	<p>zones with clear guidelines to where they apply.</p>
Review speed limits on mixed-use urban arterials (ranked #34)	<ul style="list-style-type: none"> • The majority of submitters supported this initiative. • Reasons for supporting this initiative were that speed limits on urban arterials should recognise the presence of more vulnerable road users. Large volumes of cars make arterials life threatening for road users. • There were not a lot of arguments specifically against this initiative. Most arguments were general comments against lower speed limits. 	<p>General</p> <ul style="list-style-type: none"> • Mixed support. The current processes for setting speed limits were questioned.
Increase the adoption of lower speed limits in urban areas (ranked #27)	<ul style="list-style-type: none"> • The majority of submitters supported this initiative. • Some submitters explicitly mentioned the importance of lower speed limits around schools, shops and where people walk to bus stops. • Some submitters argued this initiative is vital to protect vulnerable road users. • An argument against lower speed limits in urban areas was that the traffic is already too slow and congested. 	<p>General</p> <ul style="list-style-type: none"> • Strong support. <p>Specific comment</p> <ul style="list-style-type: none"> • LGNZ: The current process for local authorities to set speed limits is expensive and time consuming. • AA: Roads should be assessed for engineering improvements before considering changes to the speed limit.
Investigate the requirements needed to support Intelligent Speed Assistance (ISA) (ranked #62)	<ul style="list-style-type: none"> • The majority of submitters supported this initiative but with less submitters commenting on this initiative. • Submitters in favour thought it could help absent-minded or tired drivers. • Submitters against thought it would be extremely unpopular. They questioned 	<p>General</p> <ul style="list-style-type: none"> • Mixed support. • One reason for this initiative not being supported was that more research is required.

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
	the legality of tracking people.	
Reinvigorate our education and advertising to improve understanding of the risks and consequences of speeding (ranked #50)	<ul style="list-style-type: none"> • There was strong support from submitters for this initiative. • Supporters made the more general comment that a change of attitude is required. Education and advertising can contribute to this change. • A few submitters thought that the advertising campaigns were simplistic, inaccurate or gruesome. 	<p>General</p> <ul style="list-style-type: none"> • Strong support, particularly as it was thought by some stakeholders that the 'shock factor' had diminished from television advertising campaigns – a new angle is needed.

General comment

A lot of submitters from the general public commented that speed is not the underlying problem: "There is too much focus on speeding and not enough on good driving." Training, education and driving to the conditions were mentioned as more important than lowering speed limits. Some submitters questioned the facts and evidence presented in the discussion document.

Other suggested initiatives frequently mentioned

General public

- Driver education and training was the most frequently mentioned area. The ideas suggested were further reaching than in the initiatives included in the discussion document (eg compulsory re-training for drivers every five or ten years).
- Better roading infrastructure, including more median barriers, was the second most popular area in the speed section.
- There were also a lot of ideas around speed limits that did not fit into the initiatives as described in the discussion document. Some people argued that speed limits should sometimes be lower, but also sometimes be higher, depending on the situation. There was also mention of a more flexible approach (ie flexible speed limits according to the weather conditions or the time of the day): "People will respect flexibility more than the nanny state approach."
- Another frequent comment was the frustration caused by slow drivers. There were different ideas on how to deal with this issue, including penalties for not pulling over when travelling slowly.

Stakeholders

- AA: Recommended that a speed strategy be designed that recognises that the majority of speed crashes occur **below speed** limits but are 'too fast for the conditions'– self responsibility and self explaining roads need to be encouraged.

Motorcycling

(303 online + 202 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
<p>Improve rider training and licensing regime for new motorcycle riders (ranked #28)</p>	<ul style="list-style-type: none"> • Most popular initiative in the motorcycling area. • Many submitters mentioned encouraging, subsidising or requiring professional training, including track days. • A number of submitters also mentioned using a 'learner approved motorcycle' (LAM) approach (list of approved motorcycles, used in Australia) and also removing the 70 km/h speed limit for learner riders. • Some thought moped/ motorcycle training should be compulsory for all drivers before getting a car licence. 	<p>General</p> <ul style="list-style-type: none"> • Majority support. • Stakeholders saw this initiative as the best way to make the most safety gains in this area.
<p>Introduce a specific programme of treatments for motorcycle black spots (ranked # 38)</p>	<ul style="list-style-type: none"> • There was strong support from those submitters who commented on this initiative. • Many submitters supported either a black spot programme, forgiving roads or generally 'better roads'. • Some submitters mentioned temporary hazards as being a particular problem (loose gravel, roadwork signage, 'tar melt'). • Paint markings, man hole covers and 'cat's eyes' were also highlighted as an issue, as they are slippery and thus dangerous to motorcycles in particular. • Getting rid of 'cheese cutter' (wire) barriers was also mentioned several times. 	<p>General</p> <ul style="list-style-type: none"> • Majority support.
<p>Require all new motorcycles to have anti-lock brake (ABS) systems by 2015</p>	<ul style="list-style-type: none"> • There was some support, though more against than for this initiative. • Those opposed were more vocal, stating: they are not safe for all motorcycles, it should be consumer choice, 	<p>General</p> <ul style="list-style-type: none"> • Majority did not support. The safety difference of ABS on bikes compared to cars was often raised. <p>Specific comment</p>

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
(ranked #58)	<p>the cost is too prohibitive, education on bike handling would be better than creating a false sense of security, the cc rating is not a good indicator of bike size.</p> <ul style="list-style-type: none"> Some mentioned reducing ACC levies as an incentive to take up ABS and other safety features. 	<ul style="list-style-type: none"> ACC Motorcycle Reference group: rejected the proposed mandating of ABS for motorcycles over 600cc.
<p>Introduce a differential ACC levy based on engine size (ie bikes over 600cc pay a higher ACC levy than smaller bikes) (ranked #46)</p>	<ul style="list-style-type: none"> More submitters were against this initiative than for it, by a ratio of about two to one. Reasons were: the cc rating is not a good indicator of risk or bike size, it discriminates against safe experienced riders with big bikes, it is unfair to people with more than one bike or who do not travel many kilometres per year, and it would not make a difference in terms of safety (ie would not make riders safer). Alternatives suggested included: basing levies on power-to-weight ratio or horsepower rating instead of cc rating, base levy on past performance (crash and infringement history), registering the rider instead of the bike (for those with multiple bikes, and would also assist in identifying 'born again' riders for targeted training), base the levy on kilometres travelled (like Road User Charges), offer discounts for safety gear/safety features. 	<p>General</p> <ul style="list-style-type: none"> Majority did not support. <p>Specific comment</p> <ul style="list-style-type: none"> ACC Motorcycle Reference group: The group rejected the introduction of higher ACC levies for motorcycles over 600cc. AA: Suggested that if differential ACC levies are implemented, a power-to-weight ratio may be a better tool.
<p>License moped riders and require warrant of fitness (WOF) tests for mopeds (ranked #37)</p>	<ul style="list-style-type: none"> There was strong support from those submitters who commented on this initiative. This was the third most popular initiative in the motorcycling area, though most did not elaborate on why. Comments included: mopeds require a different set of skills 	<p>General</p> <ul style="list-style-type: none"> Mixed support. <p>Specific comment</p> <ul style="list-style-type: none"> AA: Supported requiring moped riders to pass a basic practical and theory test, but do not believe that mandatory WOF checks for mopeds are necessary.

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
	<p>to car driving, so of course a specific or motorcycle licence should be required.</p> <ul style="list-style-type: none"> • Conversely, others thought that people should not be discouraged from this cheap and efficient form of transport with prohibitive licensing costs. • Some supported use of the current motorcycle licence, while others supported a separate moped licence. 	<ul style="list-style-type: none"> • ACC Motorcycle Reference group: Submitted that if moped WOFs were to be introduced, the implementation would need to be a stepped approach.
<p>Promote high visibility and protective clothing for motorcyclists (ranked #39)</p>	<ul style="list-style-type: none"> • There was strong support from those submitters who commented on this initiative, though many mentioned protective clothing was more important than high visibility gear (a small number, however, mentioned that high visibility vests should be compulsory). • Others thought the onus should be on the rider to wear the appropriate gear, or that the government should only encourage and not make it mandatory. • With regards to visibility, many thought driver education to increase awareness of motorcycle presence would be better. • Some mentioned ACC subsidies for helmets and other gear, or giving a discount on levies for those with the appropriate gear. • WOF requirements for helmets were also mentioned. 	<p>General</p> <ul style="list-style-type: none"> • Majority support; although making protective clothing mandatory was not supported.

General comment

In addition, 63 people submitted the following standard submission:

“I do not support ABS brakes to new large motorcycles. If they are not factory fitted it could be very difficult for some machines to fit them and I am not convinced that if a rider lacking experience will benefit from them. I feel that the present ACC levy is disproportionate for motorcycles as opposed to other vehicles and oppose an increase.

Generally speaking the riders of larger motorcycles are more experienced riders that 'cruise'. The sports type machines of varying displacement under and over 600cc are possibly more the target for new riders who may not have the experience or skills to handle them initially. Could the ratio of mopeds be pushing up the overall accident figures for motorcycles? Increase the awareness of motorcycles amongst drivers, expand the look for bikes campaign."

Other suggested initiatives frequently mentioned.

General public

- A large number of submitters mentioned targeting other motorists for education, for example many mentioned the 'look for bikes' campaign as being effective. Some mentioned there should be more emphasis on other, more vulnerable road users in the licensing/testing regime for car drivers.
- Many supported mandatory, subsidised or encouraged professional rider training for those returning to motorcycling after a number of years of non-riding.
- A number of submitters believed better policing of motorcyclists was needed, particularly for speed and weaving in and out of traffic.
- Several mentioned providing motorcycle lanes or allowing motorcycles to use bus or high occupancy vehicle lanes (to encourage this more efficient form of transport and reduce congestion).
- Some people also thought motorcycling should be discouraged altogether, or more information should be provided on how dangerous it is.

Stakeholders

- There was a request to give more attention to people who have returned to riding in middle age, for example, by providing incentives for retraining.

Light vehicles

(254 online + 91 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
Mandate electronic stability control (ESC) on all vehicles entering the fleet (ranked #41)	<ul style="list-style-type: none"> This was the most popular initiative or suggestion in this area. Those opposed argued that there would be too much reliance on technology for safety. 	<p>General</p> <ul style="list-style-type: none"> Mixed support. <p>Specific comment</p> <ul style="list-style-type: none"> Motor Trade Association: Not in support of ESC. AA: Supported mandating the fitment of ESC.
Reduce the average age of the light vehicle fleet through the introduction of an import age ban and / or scrappage scheme (ranked #48)	<ul style="list-style-type: none"> There was support for reducing the average vehicle age. Commentators suggested a number of ways of doing this, including the various import controls or scrappage schemes in different formats. Some thought, however, that a well driven older car is safer than a badly driven new car. Other submitters also suggested we need to consider cost and cost effectiveness. 	<p>General</p> <ul style="list-style-type: none"> Strong support. <p>Specific Comment</p> <ul style="list-style-type: none"> Imported Motor Vehicle Industry Association: Opposed to placing limitations on the vehicles that may be imported and introduced into the fleet (eg insisting on standards and specifications). Asserted that research has shown such limitations have the perverse effect of exacerbating the situation.
Revise WOF standards to ensure that advanced vehicle safety systems are properly maintained and working effectively (ranked #54)	<ul style="list-style-type: none"> The majority of those who commented on this initiative supported it. Many suggested that this idea would need to be partnered with greater enforcement and punishment to ensure change in this area, as some felt that many people drove without registration or warrants. Other suggested additions were testing for noise and emissions, especially from diesel/light commercial vehicles. Among those opposed to this idea, or as a passing commentary, many considered that this could drive up the cost for many individuals. 	<p>General</p> <ul style="list-style-type: none"> Mixed support. Some stakeholders did not believe results of a revision would justify the cost. <p>Specific comment</p> <ul style="list-style-type: none"> Motor Trade Association: Not in support of changing the frequency of WOF for either newer vehicles or older vehicles. AA: Support review of WOF system to incorporate checks for advanced safety systems.
Promote the rapid uptake of	<ul style="list-style-type: none"> Of the four initiatives proposed in this area, this 	<p>General</p> <ul style="list-style-type: none"> Mixed support.

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
advanced vehicle safety systems by expanding consumer awareness programmes and developing incentives for safer vehicle purchase (ranked #57)	<p>was the least popular.</p> <ul style="list-style-type: none"> • Many commented on the need for specific things (ABS, ESC etc) rather than the wider topic. • Commentary included references to cost, and ability to effect change. 	<p>Specific comment</p> <ul style="list-style-type: none"> • AA: Supported promoting the uptake of advanced vehicle safety systems for both new and used vehicles.

Other suggested initiatives frequently mentioned

General public

- There were a significant number of submitters who suggested that no change was necessary. This often linked to the point below.
- The other most frequent comment made was that the focus needed to be on the driver rather than the vehicle. Many submitters felt that too much technology would insulate drivers from dangers and would mean greater risk-taking. Other contributors argued that crashes caused by vehicle failure were in the minority of cases, and that a competitive car sales industry will lead to fast adoption and standardisation of these features.

Stakeholders

- A number of stakeholders emphasised the importance of government working closely with vehicle manufacturers and importers to further highlight the importance of 'choosing safety' in vehicle purchase.

Walking and Cycling

(297 online + 139 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
<p>Improve techniques to integrate safety into land use planning (ranked #30)</p>	<ul style="list-style-type: none"> • There was strong support from submitters for this initiative. • A few submitters explicitly supported neighbourhood accessibility plans as a way to ensure better walking and cycling design. 	<p>General</p> <ul style="list-style-type: none"> • Support. • There was a call for the initiative to be backed up with the road user hierarchy – with cyclists/pedestrians at the top as the most vulnerable. This was linked to the importance of social considerations. <p>Specific Comment</p> <ul style="list-style-type: none"> • IPENZ: Questioned why there was no mention of strengthening councils' and consultants' design expertise.
<p>Add specific walking and cycling questions into driver licence testing so drivers are more aware of pedestrians' and cyclists' safety needs (ranked #13)</p>	<ul style="list-style-type: none"> • There was strong support from submitters for this initiative. No additional reasons provided. 	<p>General</p> <ul style="list-style-type: none"> • Support.
<p>Increase cyclist skills training in schools (ranked #14)</p>	<ul style="list-style-type: none"> • There was strong support for this initiative. It was largely thought that it is useful to start learning cycle safety early. 	<p>General</p> <ul style="list-style-type: none"> • Support, although it was often requested that this also be extended to pedestrian safety skills as well.
<p>Support the roll-out of strongly enforced variable speed limits around schools and address the issue of rural school bus safety (ranked #23)</p>	<ul style="list-style-type: none"> • There was strong support for this initiative. Some supporters commented that this initiative should be expanded (eg for longer periods when there is activity around schools, or not only around schools). 	<p>General</p> <ul style="list-style-type: none"> • Strong support.

<p>Investigate options to improve safety around rural schools and school buses (ranked #35)</p>	<ul style="list-style-type: none"> • There was less interest in this question, but of those submitters who commented, there was strong support. • One reason in support of this initiative was that many drivers do not know the rules around school buses. 	<p>General</p> <ul style="list-style-type: none"> • Support. <p>Specific Comment</p> <ul style="list-style-type: none"> • Rural Women NZ: considered that school buses should have 'active' signage, showing the 20 km/h speed limit, which operates when buses slow down, stop and pull away. • MYD consultation findings: Requested better signage (speed and warning signs) and visibility on school buses around schools.
<p>Have stronger promotion of road user education, including targeted messages and more national promotion, such as 'share the road' (ranked #20)</p>	<ul style="list-style-type: none"> • There was strong support for this initiative; it gained the highest support in this area. • Comment was made that training and more awareness is required for both drivers and cyclists/pedestrians. There is thought to be too much conflict between the different road users, instead of accepting that the other also has a right to be there. 	<p>General</p> <ul style="list-style-type: none"> • Strong support; it was also submitted that messages would have to be regionalised. National promotions need to be resourced appropriately so they can be delivered at the local level. • There was a call for programmes that encourage people of all ages to choose walking as their first travel option.

General comment

A lot of submitters from the general public thought that walking and cycling should be a high priority area, rather than medium. One reason mentioned is that everyone is a pedestrian at some point of a journey. Another is the high number of cyclists and pedestrian involved in (fatal) crashes, because they are vulnerable road users. Submitters referred to other countries and cities as positive examples for good walking and cycling conditions (eg the Netherlands and Denmark/Copenhagen). A high proportion of submitters supported 'all' initiatives in this priority area.

Other suggested initiatives frequently mentioned

General public

- In general, there were a lot of other ideas and initiatives mentioned in the walking and cycling section.
- Infrastructure: More and better cycle and/or walking infrastructure was mentioned more often than any of the proposed initiatives from the discussion document. Many submitters believed that pedestrians and cyclists should be separated from cars. Specific suggestions relating to infrastructure included: clip-ons on bridges, better surface for cycling (no gravel, no broken glass on the cycle path) or 'rumble strips' on the road edge lines to protect cyclists travelling on the shoulder from cars, especially when going around corners.

- Enforcement was the second highest ranking idea, but it was mentioned much less frequently than infrastructure. Submitters commented on enforcement of cyclists that do not follow the rules, but also on car drivers.
- More or better driver training and more emphasis on driver awareness ranked third.
- Improving the visibility of cyclists and pedestrians ranked fourth.
- Some responses expressed the view that cyclists are a hazard, and that there should be more cycling road rules.

Stakeholders

- Many stakeholders (including the Cycling Advocates Network) raised the importance of improving techniques to integrate safety into land use planning. It was submitted that local government should play an important role with this integration.
- The idea of separating transport modes on the roads as much as possible was raised.
- The need to increase the provision of footpaths and cycle lanes was also raised.

Heavy Vehicles

(191 online + 79 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
Publish operators' safety ratings based on their safety performance (ranked #55)	<ul style="list-style-type: none"> • Most submitters who commented on this initiative supported it. • Those who opposed it were often from the industry and felt that it would not add much value as they already have systems in place. 	<p>General</p> <ul style="list-style-type: none"> • Support. <p>Specific Comment</p> <ul style="list-style-type: none"> • Bus and Coach Association New Zealand: Supported, as operators will be forced to increase their safety standards to compete in the market.
Assist companies to reduce work-related road risk by implementing the commercial driver programme nationally (ranked #49)	<ul style="list-style-type: none"> • This initiative received the most support in this area. • Most submitters did not provide reasons for their support, though some mentioned that operators were thought to have a poor understanding of risk and that there needs to be a focus on fatigue. • Those who opposed this initiative did so because they were not clear where it added value. 	<p>General</p> <ul style="list-style-type: none"> • Support.
Encourage the uptake of electronic stability control (ESC) in heavy vehicles through a promotion campaign targeting commercial fleet buyers (ranked #60)	<ul style="list-style-type: none"> • Most submitters who commented on this supported it. • Many felt that it should be made compulsory for all heavy vehicles. 	<p>General</p> <ul style="list-style-type: none"> • Support. <p>Specific Comment</p> <ul style="list-style-type: none"> • IPENZ: Submitted that ESC on heavy vehicles should be encouraged, but is not a major safety issue. IPENZ argued that it is not practical or economical to require ESC to be installed retrospectively on used vehicles. In terms of a mandatory requirement, New Zealand should follow the lead of Australia.
Encourage companies to adopt the 'safe and fuel efficient' driving programme	<ul style="list-style-type: none"> • Most submitters who commented on this supported it. • Some of the submitters thought greater emphasis should be placed on efficiency; others thought 	<p>General</p> <ul style="list-style-type: none"> • Support.

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
(ranked #56)	safety should be the key focus.	

General comment

Some stakeholders argued that the Heavy Vehicles area does not need high attention as heavy vehicle manufacturers are coming up with their own safety initiatives, which have been successful.

Other suggested initiatives frequently mentioned

General public

- Many submitters supported shifting freight to rail or shipping. This received greater support than some of the proposed initiatives in the discussion document.
- A significant number of submitters specifically commented that they opposed recent government decisions to increase the allowable mass and dimension of heavy vehicles as they felt heavy vehicles are already too large.
- A number of submitters commented on speed. Some wanted the speed limits increased to align with general traffic. Others thought that current speeds were too high, or that limits should be better enforced.
- A number of submitters commented on log books and driving hours. It was felt that there should be greater enforcement of these and that some companies scheduling makes it difficult for drivers to stay within these.
- There was support for better enforcement and higher penalties for the current rules, including suggestions that the company should be liable, not just the driver.
- Other suggestions received from a number of submitters were:
 - Improved design of vehicles, especially by requiring the fitting of under run side protection to help protect cyclists and reduce spray during wet conditions.
 - Improved driver training through tougher testing and ongoing training.
 - Improved training of other road users, as risky overtaking of trucks was common and light vehicles users cause most of the crashes involving heavy vehicles.
 - Improved road design and construction to better cope with current volumes/vehicle sizes.
 - Addressing fatigue.
 - Requiring trucks to keep to the left lane on multi-lane roads.
 - Introducing new technology like GPS, hub odometers.
 - Improving alcohol and drug testing of commercial drivers.
 - Strengthening/changing Certificate of Fitness requirements.
 - Restricting hours when heavy vehicles can use the roads to off-peak times.

Stakeholders

- Introduce random roadside drug testing specifically for commercial operators. Some stakeholders requested the development and implementation of a "root cause" investigation system for heavy vehicle crashes.

Fatigue

(212 online + 81 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
<p>Promote the use of roadside stopping places and review their adequacy (ranked #32)</p>	<ul style="list-style-type: none"> • There was strong support from submitters for this initiative. • Submitters believed that rest stops are required and should be emphasised. • Submissions consistently stated that rest stops should be safe and clean with hygienic facilities. • Submissions also supported the set-up of businesses such as cafes/petrol stations that offer food and beverages. • A small number of submissions, while supporting this initiative, questioned what proportion of drivers would actually use the facilities. 	<p>General</p> <ul style="list-style-type: none"> • Support. <p>Specific comment</p> <ul style="list-style-type: none"> • LGNZ: recommended that adequate roadside stopping places be promoted as a priority in the final strategy.
<p>Make driving while fatigued an offence (ranked #51)</p>	<ul style="list-style-type: none"> • There was strong support from those who commented on this initiative. Submitters tended not to advise why they support making fatigue an offence. Often it was a case of “support all” (initiatives) or “make it an offence”. • One submission stated: “Many people drive far too long without a break. If a person is caught and has not taken a break for many hours they are endangering others—just as if they have been drinking”. • A number of submitters raised concerns about how you would police this law, particularly as there is no discernable manner to determine if someone is too fatigued to drive. • Submitters also made the comment that people can be already be charged under current transport ‘Dangerous and Careless Driving’ laws. 	<p>General</p> <ul style="list-style-type: none"> • Support, although it would be difficult to objectively enforce. <p>Specific comment</p> <ul style="list-style-type: none"> • LGNZ: Many members would have ranked making fatigue an offence if they thought it could be practically enforced.

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
Increase the range of information on fatigue (ranked #43)	<ul style="list-style-type: none"> The majority of submitters who commented on this area believed that additional information and/or education should be provided about fatigue. The majority of submitters did not give reasons why they supported increasing the range of information. 	<p>General</p> <ul style="list-style-type: none"> Support. <p>Specific comment</p> <ul style="list-style-type: none"> New Zealand Sleep Safety: Submitted that there needs to be a “Drowsy Driving” educational campaign, specifically for older drivers, and that there is also a need for public education on the combined effects of alcohol, drugs and fatigue etc.

Other suggested initiatives frequently mentioned

General public

- Submissions supported the increased use of fatigue advertising.

Stakeholders

- New Zealand Sleep Safety: Requested that the current 'Driver Fatigue Strategy' be implemented and the Driver Fatigue Working Group be re-established. Also called for improved reporting of drowsy driving and better Drowsy Driving road signs throughout New Zealand.

Distraction

(292 online + 88 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
Raise public awareness and improve education on the dangers of being distracted while driving (ranked #25)	<ul style="list-style-type: none"> • There was strong support for this initiative from submitters. When there was not support, reasoning included enforcement potentially being overly intrusive; risk of producing too much of a 'nanny state' scenario; and the problem being more to do with individual responsibility than State enforcement. • Some thought more research and development of technology would need to take place in order for this initiative to be effective. 	<p>General</p> <ul style="list-style-type: none"> • Large support. <p>Specific comment</p> <ul style="list-style-type: none"> • AA: Requested that 'distraction' is referred to as 'inattention' because 'distraction' alludes to an outside force. Stated that there is a need to include inattention as the largest risk factor in driver education courses and driver licensing processes.

General comment

Although there was strong support for this priority area from a large number of stakeholders, their comments rarely expanded on the proposed initiative. Rather, there was concern that distraction would become an offence, with stakeholders questioning the practicality of enforcement.

Other suggested initiatives frequently mentioned

General public

- A focus on driver training was considered to be more important.

Stakeholders

- AA: Requested that more reliance be placed on rumble strips, and visual threshold treatments.

Restraints

(253 online + 197 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
Bring our child restraint laws in line with best-practice (eg allow children over five years of age to use adult seat belts only when the child reaches 150cm in height. Before that require the use of an appropriate child restraint eg a booster seat) (ranked #24)	<ul style="list-style-type: none"> • There was strong support from submitters for this initiative. • A lot of submitters thought that New Zealand should follow international best practice to protect the most vulnerable members of society. • Submitters thought that changing the law is vital, as parents need to be able to rely on the law for guidance. They argued that currently they are getting the wrong information from the law. • Submitters that did not support this initiative argued that the first step should be to better enforce the existing law. Others thought that this decision should be left to the parents. 	<p>General</p> <ul style="list-style-type: none"> • Support. <p>Specific comment</p> <ul style="list-style-type: none"> • LGNZ: supported bringing in line with international best practice.
Ensure correct use of child restraints (eg by supporting programmes such as Plunket) (ranked #29)	<ul style="list-style-type: none"> • Some general comment was made about education on child restraints. • The correct use of child restraints was mentioned frequently as an important initiative. • Some submitters made specific comments about education for communities that have different values. 	<p>General</p> <ul style="list-style-type: none"> • Support.
Conduct a targeted programme to improve wearing rates for commercial drivers (ranked #61)	<ul style="list-style-type: none"> • Strengthening penalties, more enforcement and policing gained the most support in this area. • A lot of submitters also thought that employers should take more responsibility. This could be linked to health and safety regulations. 	<p>General</p> <ul style="list-style-type: none"> • Support.
Conduct a targeted programme to	<ul style="list-style-type: none"> • No relevant comment received. 	<p>General</p> <ul style="list-style-type: none"> • Support.

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
improve rear seatbelt use in regions below the national average (ranked #52)		

Other suggested child restraint initiatives frequently mentioned

General public

- The most popular suggested initiative was supporting the effective distribution of child car restraints to high needs families and communities with high Maori populations.
- More than 75 (almost) identical submissions suggested a range of additional initiatives, including:
 - the introduction of a national system through which the actual fitting and use of restraints can be checked, subsidies for car restraints are provided to high needs families
 - an addition to the WOF inspection to check that there are upper tether mounting points in all vehicles and that child restraint anchorages are robust
 - gathering information about restraints in the crash report forms completed by police at crash sites
 - conducting a national survey to collect data, as the current survey does not show a true picture of correct installations of car restraints
 - making it compulsory for car manufacturers to install upper tether mounting points in all vehicles
 - regulating car restraints coming into New Zealand (especially restraints that resemble European standards R44)
 - identifying a lead agency to co-ordinate car restraints/issues and education.

Other suggested initiatives commercial drivers

General public

- Ideas about education, creating awareness and creating a culture change amongst drivers were frequently suggested.
- Submitters also thought that wearing a seat belt should be compulsory for all drivers, and that no exemptions should be made.

Stakeholders

- Some stakeholders thought that more research was required in this area before any initiatives are progressed.

Older New Zealanders

(199 online + 75 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
Focus road and roadside improvements on sites where there have been a high proportion of crashes involving older New Zealanders (ranked #44)	<ul style="list-style-type: none"> • Support for greater improvements in this area. Suggestions included bigger signs, rumble strips and other features that would assist older drivers. • Many felt this could be partnered with greater research on 'older black spots' including looking for wider reasons for these crashes, as well as more general research in this area. • There were few dissenting comments. 	General <ul style="list-style-type: none"> • Support.
Encourage the use of safer vehicles by older drivers through a targeted campaign (ranked #59)	<ul style="list-style-type: none"> • While popular, this was the least popular of the three proposed initiatives. • Submitters suggested it could be expanded to include a recommended features list, or perhaps 'car fit' programmes to allow appropriate modifications and adjustments to be made. 	General <ul style="list-style-type: none"> • Support.
Expand road safety education for older New Zealanders (eg greater availability of refresher driver training) (ranked #40)	<ul style="list-style-type: none"> • This was the most popular initiative in this section. • There were a number of suggested ways to carry out this education, including through community and family groups. 	General <ul style="list-style-type: none"> • Support.

Other suggested initiatives frequently mentioned

General public

- There was significant support for the return of the 'Safe with Age' programme and many comments expressing surprise at its discontinuance.
- Age-linked retesting was the second most popular suggested initiative, with many suggesting that this should relate both to medical reaction time and practical components of testing. Others also suggested that this testing should apply to all drivers at regular renewal intervals.

- There was much comment on the need to provide suitable transport alternatives because mobility is a major factor in the quality of life for older New Zealanders. There was some support for SuperGold cards, and their wider applications.
- Providing all drivers with an updated list of recent rule changes at the time of licence renewal was also suggested.

Stakeholders

- AA: Requested that the government progress a nationwide implementation and funding of an accredited system of independent driver assessment and monitoring for older/medically impaired drivers.
- Many stakeholders believed general practitioners were too reluctant to remove licences and were therefore reissuing the older driver's licence too freely.

Education

(276 online + 93 hardcopy/email submissions)

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
<p>Are we putting enough emphasis on road safety education?</p>	<ul style="list-style-type: none"> • A large number of submitters thought that there is not enough emphasis on road safety education. • Some submitters thought that further education should be broad ranging, and use a variety of mediums. 	<p>General</p> <ul style="list-style-type: none"> • Not enough emphasis has been placed on road safety education. • Need to focus on education at an early age to create generational change. • Education should not be limited to technical skills/ability, but changing attitudes that will ultimately change New Zealand's driving culture. • Educators are currently sending out mixed messages. • Proposed reduction in National Land Transport Programme shows a lack of government support for road safety initiatives. • Legislation alone is not working – need to utilise education as an empowering model for young people. <p>Specific comment</p> <ul style="list-style-type: none"> • LGNZ argued that education initiatives are significantly cheaper to implement than almost any alternative engineering or enforcement solutions. • NZ Driver Educators: Believed there is a need to work closely with the driver education industry to create better alignment and coordination, based around the premise of one standardised baseline curriculum. • AA: Recommended that government needs to accept that a paradigm shift has occurred in road safety education. Need to take an injury prevention approach to road safety education rather

INITIATIVE	GENERAL PUBLIC	STAKEHOLDERS
		than linking it solely to enforcement.
In your opinion does our current road safety advertising work well?	<ul style="list-style-type: none"> • The majority of submitters believed the current campaign (graphic advertisements) is not working and that people have become desensitised to it. • Submitters wanted educational advertisements that focus on key competencies required for driving. • Submitters believed the focus needs to be on education and more positive pro-active advertising (such as particular road rules ie intersections). 	<p>General</p> <ul style="list-style-type: none"> • Suggested that the shock factor in advertising no longer exists and needs to be reconsidered. • Saw a need to tailor advertising to the specific regions (difference between rural driving and urban driving).
How can we better link our education efforts with other road initiatives?	<ul style="list-style-type: none"> • A large number of submitters believed that driver/road safety training should be a compulsory subject at school from primary level onwards, and with the option of being linked to secondary school qualifications. • A large number of submitters believed that training programmes should be created that target dangerous habits – speeding, inability to drive to conditions, safety etc. A significant portion of submissions believed that this should be developed with relevant non government organisations. • There was support for positive advertisements (educational advertisements that reinforce current laws, how to handle distraction and fatigue, how to use indicators and specific intersection rules). 	<p>General</p> <ul style="list-style-type: none"> • The need for improved resources to back up education was referred to.

Other suggested initiatives frequently mentioned

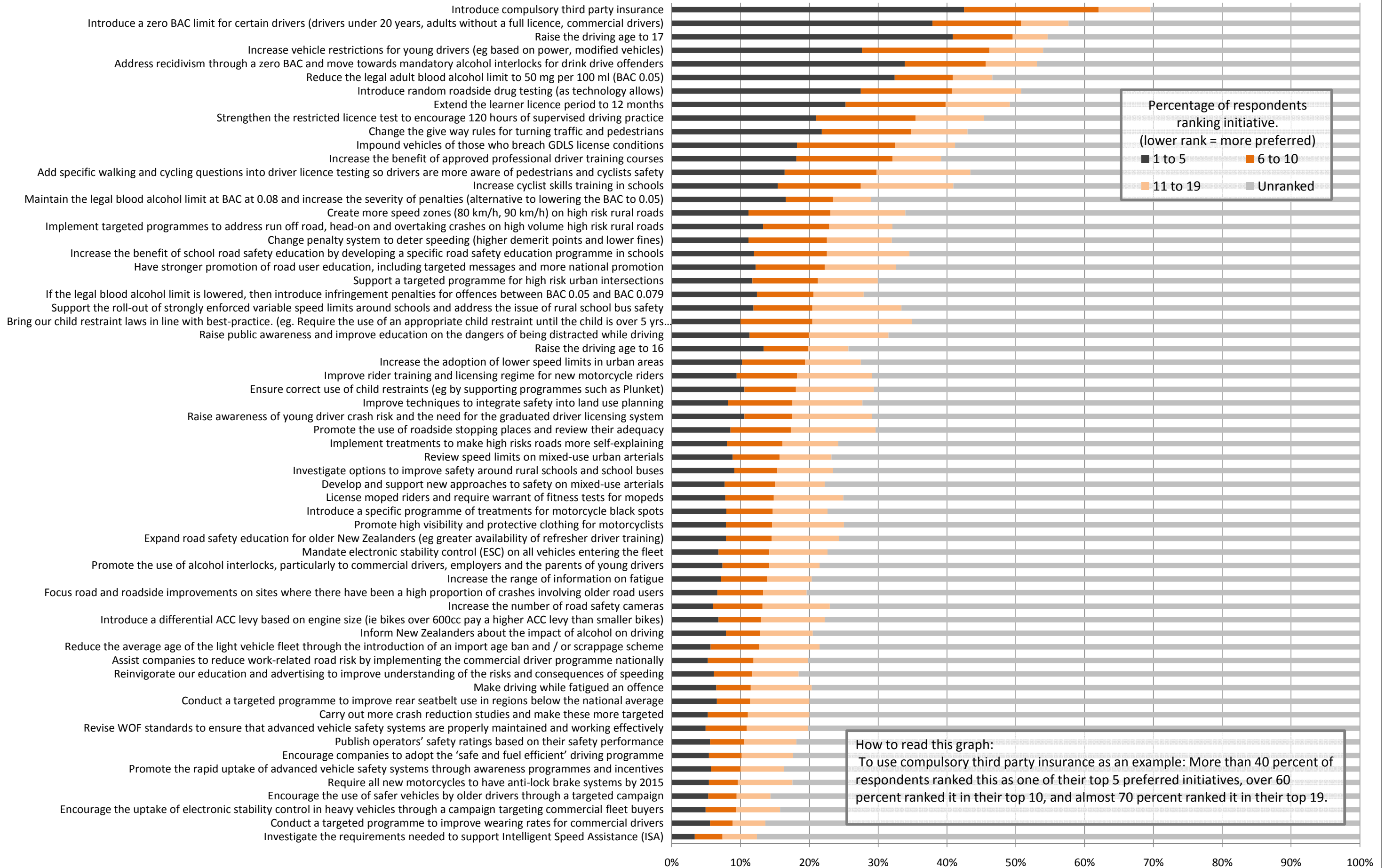
General public

- There is a need to convey the human cost of crashes through advertisements with victims and perpetrators of crashes, and seminars with victims.
- Re-sitting of licences after a period of time.
- More collaboration between central and local government and non-governmental organisations.

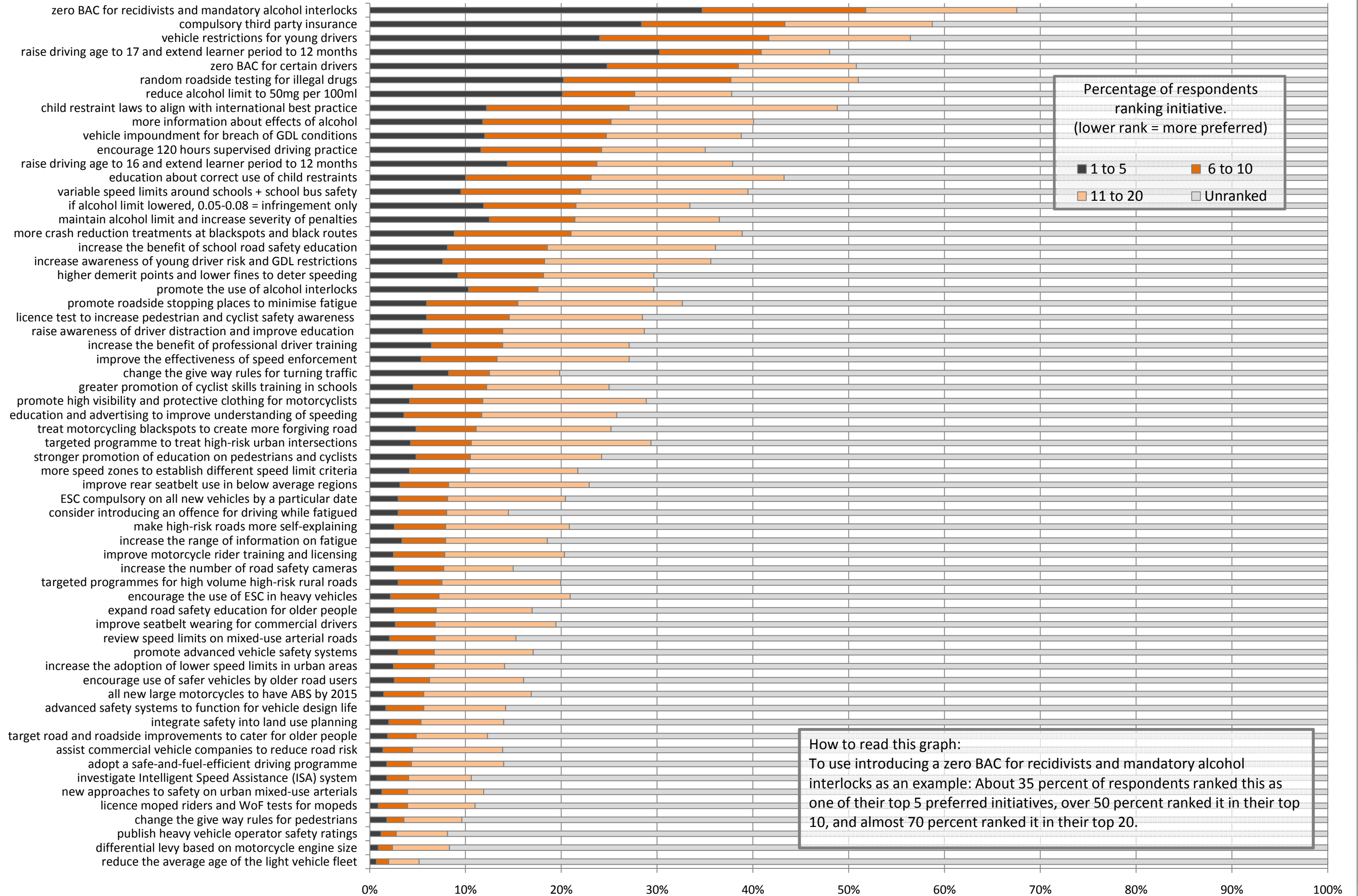
Stakeholders

- The AA recommended establishing an interagency education working group.

Rankings of road safety initiatives in the discussion document web and general public submissions, 1219 respondents



Rankings of road safety initiatives in the NZTA survey, 1008 respondents



How to read this graph:
 To use introducing a zero BAC for recidivists and mandatory alcohol interlocks as an example: About 35 percent of respondents ranked this as one of their top 5 preferred initiatives, over 50 percent ranked it in their top 10, and almost 70 percent ranked it in their top 20.