

OC230530

12 July 2023

Tēnā koe

I refer to your email dated 14 June 2023, requesting the following under the Official Information Act 1982 (the Act):

“all submissions made by organisations to the public consultation on the Road to Zero strategy which was taking feedback in 2019”.

Your request was rescoped on 27 June 2023 to focus on submissions from the following organisations:

- The Motor Trade Association
- Transporting New Zealand (now known as Ia Ara Aotearoa)
- National Road Carriers
- Bus and Coach Association
- The Trucking Association

One document falls within the scope of your request and is enclosed. This document contains the submissions from the Motor Trade Association and the Bus and Coach Association.

Certain information is withheld under the following sections of the Act:

9(2)(a) to protect the privacy of natural persons

With regard to the information that has been withheld under section 9 of the Act, I am satisfied that the reasons for withholding the information at this time are not outweighed by public interest considerations that would make it desirable to make the information available.

With regard to the other submissions requested, I am refusing your request under the following section of the Act:

18(e) that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found

The survey responses collected in 2019 informed the policy development and finalisation of the Road to Zero Strategy. The Ministry of Transport published a summary of the submissions received. *Road to Zero: Summary of Submissions* outlines the themes of responses and can be found on the Ministry of Transport’s website here:

<https://www.transport.govt.nz/assets/Uploads/Submission/RSS-Summary-of-Submissions-FINAL-v2.docx.pdf>.

The Ministry no longer holds the majority of the Road to Zero survey responses and supporting material. However, we have provided the information we have retained that is within the scope of your request.

You have the right to seek an investigation and review of this response by the Ombudsman, in accordance with section 28(3) of the Act. The relevant details can be found on the Ombudsman's website www.ombudsman.parliament.nz

The Ministry publishes our Official Information Act responses and the information contained in our reply to you may be published on the Ministry website. Before publishing we will remove any personal or identifiable information.

Nāku noa, nā

A handwritten signature in blue ink, appearing to read 'Helen White', with a stylized flourish at the end.

Helen White
Manager, Mobility and Safety

#22

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, August 16, 2019 10:36:49 AM
Last Modified: Friday, August 16, 2019 10:55:27 AM
Time Spent: 00:18:38
IP Address: 122.58.226.183

Page 2: Online submission, page 1

Q1

VISION Our proposed vision for road safety is: 'a New Zealand where no one is killed or seriously injured in road crashes'. To what extent do you support the proposed vision?

(no label)

What was the reason for your rating? Do you have any other comments on the proposed vision?:

Strongly support

Support vision intent MTA has always believed in safety first and always. Even though the vision is aspirational, that is not a reason to not strive towards it. See also our supporting document.

Q2

TARGET As a step towards achieving this vision, we propose a target of a 40 percent reduction in deaths and serious injuries by 2030. What do you think about this target?

(no label)

What was the reason for your response? Do you have any other comments on our proposed target?:

That target seems about right

reasonable target The target may be too high or it may be too low - we won't know until we start taking actions and measuring. A target does need to be set and it might as well be a stretch target. See the MTA submission in support of our comments.

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Q3

Principle 1: We plan for people's mistakes We accept that people will make mistakes and take risks but that these mistakes should not result in people dying or suffering serious injuries on our roads. Our first principle is: 'We plan for people's mistakes'. To what extent do you support this principle?

(no label)

Do you have any further comments about this principle?:

Somewhat support

implementation concern This principle must be applied in conjunction with Principle 4 on shared responsibility.

Q4

Principle 2: We design for human vulnerability There are physical limits to the amount of force our bodies can take before we are injured in a crash and we will design our road system to acknowledge this. Our second principle is: 'We design for human vulnerability'. To what extent do you support this principle?

(no label)

Strongly support

Q5

Principle 3: We strengthen all parts of the road transport system We will improve the safety of all parts of the system – roads and roadsides, speeds, vehicles, and road use – so that if one part fails, other parts will still protect the people involved. We will make roads and streets safer for more vulnerable road users such as pedestrians, cyclists, motorcyclists and scooter riders. Our third principle is: 'We strengthen all parts of the road transport system'. To what extent do you support this principle?

(no label)

Strongly support

Do you have any further comments about this principle?:

focus on vehicles MTA is pleased to see vehicle safety and condition receive more emphasis in this strategy. See our supporting submission for more information.

Q6

Principle 4: We have a shared responsibility for improving road safety The people who design, build and manage the road transport system, as well as the individuals and communities who use it, all have a part to play in making our roads safe. Our fourth principle is: 'We have a shared responsibility for improving road safety'. To what extent do you support this principle?

(no label)

Strongly support

Do you have any further comments about this principle?:

focus on enforcement **focus on drivers, education** While planning for mistakes, we must encourage people to take responsibility for the safe operation of their vehicle. Government has a role to play here through its enforcement and compliance activities. See our supporting submission for more information.

Q7

Principle 5: Our actions are grounded in evidence and evaluated We will strengthen our road safety research so that we can base our decisions on the best evidence available. We will evaluate the changes we make so that we see what works, what doesn't work and what needs to be altered. Our fifth principle is: 'Our actions are grounded in evidence and evaluated'. To what extent do you support this principle?

(no label)

Strongly support

Do you have any further comments about this principle?:

suggestion MTA would urge this approach when considering the use of safety ratings for import standards. The "best evidence" approach does seem lacking in the concurrent consultation on low emissions standards (Clean Car).

Q8

Principle 6: Our road safety actions support health, wellbeing and liveable places Our roads are not just used for getting from A to B. In urban areas in particular, they are often places where people meet, shop and where children play. We will acknowledge this in our decision-making process to support healthier and more liveable places. Our sixth principle is: 'Our road safety actions support health, wellbeing and liveable places'. To what extent do you support this principle?

(no label)

Strongly support

Q9

Principle 7: We make safety a critical decision-making priority We will treat safety as a higher priority in the way we make decisions. This does not mean that other objectives, such as efficiency, are no longer important, but that they should not be achieved at the cost of safety. Our seventh principle is: 'We make safety a critical decision making priority'. To what extent do you support this principle?

(no label)

Strongly support

Do you have any further comments about this principle?:

Support MTA agrees that safety should be critical and we hope to see consideration of this element in the Clean Car consultation currently underway.

Q10

Respondent skipped this question

Do you have any final comments about our principles?

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Q11

Focus Area 1: Infrastructure and Speed Our roads and streets reflect our natural landscape and changing communities: our roads are winding, hilly and often narrow, and our streets can be full of people, and bustling retail areas. Not all risks are visible, and the wrong speed can result in an unforeseen tragedy. Improving our road infrastructure and setting and enforcing safe speed limits are some of the most powerful ways we can create a road system that is forgiving of human mistakes. Our first focus area is: 'Improve the safety of our cities and regions through infrastructure improvements and speed management.' To what extent do you support this focus area?

(no label)

Don't know

What was your reason for this rating? Do you have any further comments about this focus area?

MTA's focus is on in-service vehicle safety. See our supporting submission.

Q12

Focus Area 2: Vehicle safety The design and safety features of our vehicles matter. Safer vehicles not only help drivers avoid crashes, but also protect occupants and other road users when crashes do happen. Our second focus area is: 'Significantly improve the safety performance of the vehicle fleet'. To what extent do you support this focus area?

(no label)

Strongly support

What was your reason for this rating? Do you have any further comments about this focus area?:

Other See our submission document for more information.

Q13

Focus Area 3: Work-related road safety Employers have a responsibility to ensure that work-related road travel is safe for their staff and the public. About 25 percent of the deaths on our roads involve someone driving for work, whether as a commercial driver or as a secondary part of their main role. Ensuring that road safety is treated as a critical health and safety at work issue has the potential to significantly reduce this harm. Our third focus area is: 'Ensure that businesses and other organisations treat road safety as a critical health and safety issue'. To what extent do you support this focus area?

(no label)

Strongly support

Q14

Focus Area 4: Road user choices Everyone has a responsibility to act with care and consideration on our roads. We need to continue to shift public attitudes and behaviour through road safety education and promotion, ensure that our training and licensing systems equip people with the skills required to be safe, alert and compliant, and deliver effective enforcement targeted towards risk. Our fourth focus area is: 'Encourage safer choices and safer behaviour on our roads.' To what extent do you support this focus area?

(no label)

Strongly support

What was your reason for this rating? Do you have any further comments about this focus area?:

Focus on vehicles We believe behavioural change includes changing attitudes to ongoing maintenance of vehicles.

Q15

Focus Area 5: System management Everyone who uses, designs, manages and maintains our roads, streets and footpaths has an important role to play. Leadership, co-ordination, engagement, and accountability will therefore be critical if we are to achieve our road safety ambitions. Our fifth focus area is: 'Develop a management system that reflects international best practice.' To what extent do you support this focus area?

(no label)

Strongly support

Q16

Respondent skipped this question

Do you have any final comments about our focus areas?

Page 5: Online submission, page 4

Q17

ACTION PLAN PRIORITIES We have proposed a list of 14 priority actions under our five focus areas. Please tick your top three priorities from the list below.

Raise safety standards for vehicles entering the fleet,

Prioritise road policing,

Promote the availability of vehicle safety information,

Do you have any comments about these priority actions?:

Suggestion It is hard to pick 3 - motorcycle safety is also important, as is system leadership.

Q18

ADDITIONAL ACTIONS Do you have any suggestions about other actions we could consider for future action plans?

Other See our submission for further information and recommendations.

Q19

MEASURING SUCCESS The Road to Zero consultation document provides a draft outcomes framework, which provides a list of key measures that can help us track progress and performance indicators to help us meet our targets. This outcomes framework will help us monitor how the road safety system is performing, drive action and hold agencies publicly accountable for delivering the strategy. The framework will continue to evolve as we develop the final strategy. Do you have comments about the way we intend to monitor our performance?

Suggestion MTA recommends an independent review of strategy progress.

Q20

Additional supporting material

MTA submission on Road to Zero 160819.pdf

Page 6: Online submission, page 5

Q21

A little bit about you:

Name

s 9(2)(a)

Organisation (optional)

Motor Trade Association Inc

Email Address

s 9(2)(a)

Q22

Who are you submitting on behalf of?

NGO / advocacy group

Q23

What region do you live in, or most often travel in?

Wellington

Q24

Do you consider your perspectives urban, rural or both?

Both

Q25

Respondent skipped this question

Ongoing partnership with Māori will be a focus in our road safety efforts so we can build a shared understanding and road safety responses that appropriately meet the needs of tangata whenua in New Zealand.

Q26

No

USE AND PUBLIC RELEASE OF INFORMATIONThe Ministry of Transport will publish a summary of submissions, which may include quotes from individual submitters. Do you want your submission to be anonymous and your name or organisation's name to be withheld from any information that the Ministry of Transport publishes?

Q27

Your submission is also subject to the Official Information Act 1982 (OIA). This means people will be able to obtain copies of submissions by making a request under the OIA.

I understand that this submission will be classified as Official Information and may be subject to public release under the Official Information Act 1982 if requested.

Q28

Respondent skipped this question

If you want us to keep some sections of your submission confidential, please let us know your reasons below. We will take your reasons into account and may consult with you when responding to requests under the OIA.

#33

COMPLETE

Collector: Web Link 1 (Web Link)
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Page 2: Online submission, page 1

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Q16

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Q20

Additional supporting material

BCA Submission on Road Safety Strategy 2019.pdf

Page 6: Online submission, page 5

Q21

A little bit about you:

Name

s 9(2)(a)

Organisation (optional)

Bus and Coach Association

Email Address

s 9(2)(a)

Q22

Who are you submitting on behalf of?

NGO / advocacy group,

Other (please specify):

Industry Association

Q23

What region do you live in, or most often travel in?

Wellington

Q24

Both

Do you consider your perspectives urban, rural or both?

Q25

Respondent skipped this question

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Q26

No

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