Public Health Association of Australia submission on Towards Zero – Road Safety in the Northern Territory

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Introduction

The Public Health Association of Australia

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public’s health in Australia. The PHAA works to ensure that the public’s health is improved through sustained and determined efforts of the Board, the National Office, the State and Territory Branches, the Special Interest Groups and members.

The efforts of the PHAA are enhanced by our vision for a healthy Australia and by engaging with like-minded stakeholders in order to build coalitions of interest that influence public opinion, the media, political parties and governments.

Health is a human right, a vital resource for everyday life, and key factor in sustainability. Health equity and inequity do not exist in isolation from the conditions that underpin people’s health. The health status of all people is impacted by the social, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the unfair and unjust effects of conditions of living that cause poor health and disease. These determinants underpin the strategic direction of the Association.

All members of the Association are committed to better health outcomes based on these principles.

Vision for a healthy population

A healthy region, a healthy nation, healthy people: living in an equitable society underpinned by a well-functioning ecosystem and a healthy environment, improving and promoting health for all.

Mission for the Public Health Association of Australia

As the leading national peak body for public health representation and advocacy, to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

Preamble

PHAA welcomes the opportunity to provide input to the consultation on a new Road Safety Action Plan in the Northern Territory. The reduction of social and health inequities should be an over-arching goal of national policy and recognised as a key measure of our progress as a society. The Australian Government, in collaboration with the States/Territories, should outline a comprehensive national cross-government framework on reducing health inequities. All public health activities and related government policy should be directed towards reducing social and health inequity nationally and, where possible, internationally.

In the spirit of a focus on health and social equity PHAA would consider that the issues to be addressed in this consultation are those of mobility, equity and sustainability, rather than road safety in isolation. NT and Australia generally have developed around cars. As a result, road safety is a public health, economic and wellbeing concern. Besides the road toll, other adverse effects of the dominance of cars in NT are inequity of access to transport options, few people achieving adequate physical activity because few people use active transport, significant carbon emissions from road travel, and congested urban centres even in a city as small as Darwin. Road safety is one of many issues that will be addressed by a forward looking transport and access plan, with a focus on active and public transport, with optimal use of telecommunications to avoid the need for unnecessary travel.
PHAA Response to the discussion paper

Alcohol and drugs

How can people be discouraged/deterred/prevented from drink/drug driving?

From the perspective of road safety, alcohol is the overwhelming issue rather than other drugs, particularly in NT (1). Road trauma is one of many health, social, and economic problems caused by alcohol. However, focus on road safety provides an opportunity for alcohol-related harm to be discussed that may be less fraught than other alcohol-related health issues.

The concurrent inquiry into alcohol legislation in NT should provide additional input to this question, and road safety should be considered as one of many benefits of effective alcohol legislation. Effective policies to reduce alcohol related harm are: increasing alcohol taxation, setting a minimum unit alcohol price, and reducing alcohol availability. These policies are most effective against those that drink the most alcohol, suffer the greatest harm and those of lower socio-economic status. That is, they are highly effective among the poorest people and young and heavy drinkers. Governments need to counter anecdotal stories that suggest otherwise, and build a strong community voice for better alcohol control in NT (2).

NT based strategies, including the Alcohol Mandatory Treatment program, Banned Drinkers Register and Temporary Beat Locations should be evaluated and refined to optimise their effectiveness and cost-effectiveness in relation to all alcohol-related harm. In a jurisdiction as small as NT it may be possible to individualise deterrence measures to address individuals’ vulnerabilities and provide safety for both people at risk of drink-driving and the community. One of the strengths of the Banned Drinkers Register was that it considered alcohol-related offences, including traffic offences, as health issues rather than as criminal or police issues. This gave people an option to seek care and reduce the duration of their alcohol ban. Such a strategy is consistent with evidence that people who commit alcohol-related offences often suffer from alcohol-related health issues. Similarly, the Alcohol Mandatory Treatment program identified people who had previously been outside of the reach of health services and provided an opportunity for them to access health care.

Unlike in other states of Australia, many people in NT who are involved in road crashes related to alcohol are travelling long distances on rural roads, rather than between city and home. Better public transport including inter-urban transport is one strategy to provide alternative and safe means for people to travel. In line with strategies from other jurisdictions, random breath testing, campaigns targeting alcohol and driving, education programs, and enforcement of driving under the influence of alcohol laws should all be part of the overall strategy.

Are the penalties for drink/drug driving adequate?

Evidence based on high levels of recidivism suggests that penalties in NT do not deter people from drink driving, relative to the strength of factors that lead to repeated drink driving. Furthermore, our high Indigenous imprisonment rates also point to failure of incarceration to deter drink driving. It is likely that local research is needed to determine effective interventions in NT.

With the increasing mobility of Australians, and noting the high road toll in NT, the penalties in other jurisdictions provide a guide to appropriate levels for NT.

Should we clamp or seize vehicles for repeat offenders?

Clamping and seizing vehicles and other strategies can be conceived as health interventions to protect the community from people who are at risk of driving while intoxicated, rather than as punitive measures. Local research, both quantitative and qualitative is needed to determine effective interventions for the situation in the NT, recognising both costs and benefits of different strategies, where the primary aims are mobility,
equity and sustainability as well as public safety. Other measure may also include the use of interlock devices which do not allow the car to start if a person is intoxicated (3).

**Should we have a lower blood alcohol limit?**
Relative risks of crashing at different blood alcohol levels are known, with significant risk observed even at a level of 0.02%(4). The risk increases at any level above zero, rising exponentially as the blood alcohol content rises, and is associated with other risky behaviour such as speeding and not wearing seatbelts(5). Given the high levels of alcohol consumption in NT, and high road toll, NT should take a leadership role in reducing the blood alcohol limit, with a view to considering the merits of a zero blood alcohol limit for all drivers in the longer term. This could be initiated for probationary drivers, as is the case in most other Australian jurisdictions, so that the upcoming generation of drivers can teach older drivers that alcohol and driving are always separate (6,7,8).

**Do you think random testing will reduce drink/drug driving?**
Yes, there is consistent and high quality evidence that random breath testing with adequate frequency and penalty is an effective deterrent to drink driving. To be effective RBT relies on both education of drivers about effectiveness of RBT in increasing safety, and the perception that RBT is truly random and ubiquitous. People need to believe that all drivers are always at risk, with severe, certain and swift enough punishments to act as deterrent (9).
It is important to use targeted advertising to forestall community resistance to RBT from the perception that its purpose is to raise money for government. If random breath testing is perceived to be limited to particular people or particular events its effectiveness will be limited, and NT will continue with our high rate of tragic events on the roads. Alcohol still contributes to 43% of road fatalities in NT, compared with 17% in Victoria - which has less than 1/4 the NT road toll per person. RBT should be promoted as a commitment to community wellbeing, and a deterrent to driving after drinking.

**Do you think drink/drug driving education and enforcement campaigns make a difference?**
Yes. Education and enforcement are complementary. They should be locally developed and subject to ongoing evaluation. They should not be considered an end in themselves. Neither will work as effectively in isolation as they will when linked.
Road safety education campaigns for children should also be critically evaluated for effectiveness and cost-effectiveness.

**Seatbelts and child restraints**

**How can we make sure everyone wears a seatbelt?**
Education and enforcement: Anecdotal experience and observation complements road crash data suggesting that people in NT do not believe that they are likely to be fined for not wearing seatbelts, even in urban centres. Sensitive involvement of road crash victims as educators may enhance education programs.
It is likely that a better public transport service for remote Aboriginal communities would ensure more access to safe travel. Public transport can ensure that people are travelling in vehicles that are in road-worthy condition, have adequate seating and appropriate child restraints.
Campaigns focusing on this issue linked to police enforcement will also help increase compliance rates. Targeting children to influence their parents is another strategy that ought to be deployed.
What can we do to better support/encourage the use of child restraints, especially in our regional and remote areas?

A better understanding of why seat belts and child restraints are not used, and how people can be encouraged to use them, is needed to respond to this question. The research project itself would be an important intervention, raising awareness and potentially employing Aboriginal people from remote communities to be conducting the research. Extrapolating from other jurisdictions has a place. However, there are unique circumstances in the NT that warrant specific research.

Child restraint programs in partnership with community organisation (e.g. Kidsafe) where they provide the restraint and fit it properly are essential to ensure they are available in the community. Making sure that when parents leave the hospital there is an appropriately fitted restraint in the car will also increase use. Arrangements for this to be purchased through parental benefits rather than a one-off up-front payment may enhance capacity to pay. Schemes for donating used capsules as families move to beyond baby stage, capsules and child restraints to be hired are important alternatives which spread the cost over time, making them more affordable.

Should we invest in a community awareness seatbelt campaign?

Community awareness seatbelt campaigns should ideally be in conjunction with a wider program that includes enforcement. It is likely that an effective campaign would save far more in health, emergency services and lives than it would cost. However, evaluation and development of awareness campaigns is needed as part of an overall strategy rather than standalone interventions. Better inter-urban public transport may reduce the numbers of overloaded private cars, with more people than seat belts, driving to remote communities.

Speed and driving to conditions

How can we stop people speeding and driving dangerously?

Surveys internationally show that to up 90% of drivers believe that their driving ability is above average (16) so a comprehensive approach is needed, rather than focusing only on individual people speeding and driving dangerously.

Social media through the period of speed limit removal and then re-implementation of speed limits revealed that many people today believe that modern vehicles are safe at any speed. Thus, education must be complemented by policing and enforcement. Sensitive involvement of road crash injury victims may increase effectiveness of education campaigns.

Targeting blackspots as well as areas where lower speed are required (such as residential areas) with speed cameras, speed humps, and revised speed zones will help reduce speeding as part of an overall strategy which looks at travel patterns, environmental modifications (e.g. divided roads, barriers, etc).

Introduction of driverless vehicles may reduce speeding, and provide a source of awareness about safe speeds.

What can be done to stop people holding and using their phones while driving?

Education and enforcement: Investigate the possibility of devices that can prevent mobile phones functioning by a driver in a moving vehicle, or stall a vehicle in which there is a mobile phone being used by a driver, analogous to alcohol-interlocks.

Penalties for using mobile phone while driving must be high enough to be effective. Queensland has a cascading system, with a fine of $365 and 3 demerit points for the first offence and subsequent offences incur double demerit points (11). A system like this may be effective in NT.
Are the penalties for speeding adequate?
Penalties must be adequate to deter offending, and especially repeated offending. There may be a need to individualise penalties to be effective for individuals at a high risk of re-offending. This needs to be complemented by strategies to ensure that people’s access needs are met, particularly travel to work. The penalties should be in line with other jurisdictions.

Public transport and active transport strategies may contribute to reducing speeding offences, and these options highlight the overall goals of transport policy, particularly mobility and equity.

Should penalties be increased for mobile phone use while driving?
Using mobile phones while driving is dangerous, and both likelihood of being apprehended and penalties should be increased. However, this should be complemented by education to increase community awareness that even using mobile phones hands-free is not safe (12), because they are qualitatively different from and more distracting than conversations with passengers (13). Encouraging drivers to give their phones to passengers, or turn them off, would ensure that people do not feel disadvantaged by not using the phone while driving.

Should we review and reduce some of our speed limits?
Yes, the failure of Alice Springs to reduce speed limit to 50km per hour for built up areas as in the National Road Rules is an example of NT exceptionalism. This can be countered by incentives such as increased road funding.

Likewise the maximum limit in NT of 130km per hour is considerably higher than maximum speeds in other jurisdictions and contributes to NT’s road toll, and the culture of risk-taking. The connection between speed and crashes is complex, and there are many other factors involved in fatalities. However, some of those key factors are not in NT’s favour – light traffic on highways meaning that victims are less likely to be found immediately than in more populated areas; long distances to hospitals and for ambulances to travel; predominately single lane, unseparated roads; many unsealed roads. All of these issues mean that potentially life-saving intervention immediately following road trauma is less likely to occur in the NT. It is therefore imperative to reduce the risk of crashes occurring, and Australian and international studies have shown that reducing the speed limit by 10 km/h on rural roads decreases the risk of crashing by 20-25% (14). However people’s voices must be listened to, and perhaps using a victim of high speed crash to raise awareness of the risk of speed would be more effective than a top down approach that addresses Territorians as if they are careless or poor drivers.

Should we install more speed, red-light or point to point cameras?
Yes, each of these are likely to be cost effective means to save lives. A campaign based on freedom from accidents and disability should complement such a policy to avoid accusations of nanny-state government.

Should we invest in mobile phone distraction community awareness campaigns?
Yes, this is likely to be a cost-effective means to reduce crashes; however key risk factors for crashes in NT remain alcohol, speed, not wearing seat belts, and fatigue. Such a campaign needs to be combined with appropriate enforcement strategies.

How can we educate people about the risks and outcomes of speeding?
Greater enforcement of speed limits, using cameras to reduce police workload may contribute to education. The most likely outcome of speeding is a fine and demerit points, rather than a crash, so education must be complemented by penalties that are high enough to deter speeding.

Victims of road crashes may contribute to an education campaign to assist in overcoming the notion that crashes happen to other people.
How can we stop people driving on flooded and damaged roads?
Inappropriate media sensationalism and glorification of people driving on flooded roads should be brought to the attention of media operators. Drivers should be encouraged to plan so that the need to continue a journey on flooded roads is not so urgent.

Road safety authorities need to provide clear communication about flooded roads and alternative travel routes.

In the longer term building of bridges should be considered. There should be signage at decision points as well as immediately prior to the flooded area. Advice and support for people stranded in flooded areas, including work safety advocacy may also reduce the tendency to drive in flooded and damaged roads. This can complement penalties for breaching road closure signs.

Roads and roadsides

How can we make our roads and roadsides safer?
Very narrow road shoulders and verges, and few audible markers to alert drivers when they are crossing lanes are current hazards. Mechanisms to make roads safer are well-established, and government should work with community to ensure that NT roads are raised to national standards.

Should we use more innovative technology to provide up to date road safety information to road users?
Where there is clear evidence that the use of these technologies improve road safety, they should be considered. However, the possibility that they are a distraction while driving needs to be included in analysis of their effectiveness.

Vulnerable road users – Indigenous people

How can we reduce the over representation of Indigenous people in our crash statistics?
Indigenous people themselves are the key stakeholders in this discussion. Increasing interurban public transport would likely reduce the numbers of Indigenous people driving, particularly on remote roads. Subsidising the cost may ensure they are more affordable for community members. Compared to the cost of treatment, attendance at crashes and policing time there may well be savings to be made by subsidising such transport.

Alternatively, subsidising flights that are used by both service providers and community members may reduce overall costs and also crash risk on roads to isolated communities. I note that WA government subsidises flights from Alice Springs to WA communities near the NT border. These are not much more expensive than the bush bus and are often booked out. Meanwhile in NT, each government and non-government service agency charters flights to meet their own needs, while the bush bus is often unaffordable for community members. Sometimes there are multiple charter planes for different agencies to the same place on the same day. The cost of this to governments, whether directly for government agencies, or indirectly if services are provided by NGOs is likely to be significantly greater than the cost of subsidising a regular passenger service to communities. There may also be wider benefits to tourism in the NT with this approach.

How can we better support Indigenous communities in the development of appropriate initiatives to help keep their people safe?
Facilitate Indigenous leadership. Road safety may not be a current priority for Indigenous peoples who experience a lack of safety in many aspects of their lives. Engaging with them, building understanding of motivations and behaviours, and having Aboriginal people themselves develop locally relevant messaging and programs is needed.
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Should we invest more in targeted culturally appropriate campaigns and educational campaigns?
Yes, and this would have benefits in both the development and implementation of the campaigns. Aboriginal leadership and employment of Aboriginal people in educational campaigns, and increasing the visibility of Aboriginal people in positive news would have manifold benefits.

Vulnerable road users – young drivers

How can we keep our young and novice drivers safe on our roads?
Reducing the need for travel, particularly high risk travel, will enhance the safety of young people. This includes promoting and incentivising active and public transport. Promoting both urban and inter-urban public transport as exciting for young people may reduce the pressure on them as drivers. Basic strategies established in other states and territories include encouraging the purchase of safer vehicles, reducing night driving, reducing distracted driving with a number of friends in cars, targeting alcohol, speeding, fatigue, and risk taking.

Do the current driver training programs make a difference and how can we increase participation?
Active transport and other options for young people may reduce their need to drive. Considering transport, mobility and equity as goals alongside safer roads may lead to better overall outcomes than focussing on road safety or driver training in isolation.

Should we strengthen our licensing system to reduce the risk of crashing? For example – impost night driving or peer passenger restrictions
Yes, targeted strategies to reduce the vulnerability of young and novice drivers are needed. These should be promoted as liberating people from risks of trauma and life-shortening injury to avoid accusations of nanny state or ageism. Lengthening probationary periods, reducing speed for probationary drivers, restricting night time driving and peer-age passengers can all be effective, and have been successfully implemented in other Australian jurisdictions.

These strategies should be complemented by improved public transport systems and promotion of active transport so that young people’s needs are met.

Should we invest more in our education programs and online tools?
Yes. Education and enforcement are complementary. Education programs and online tools should be locally developed and subject to on-going evaluation. They should not be considered an end in themselves. Road safety education campaigns for children should also be critically evaluated for effectiveness and cost-effectiveness. Education programs aimed at increasing active transport and encouraging use of public transport may also benefit for the community.

Vulnerable road users – motorcyclists

How can we reduce motorcycle crashes on our roads?
Public awareness campaigns around identifying and looking out for motorcyclists, ensuring they are wearing the appropriate safety gears, targeting alcohol, speeding and fatigue, appropriate training.

Should we introduce lane filtering to keep motorcycle riders safer in low speed traffic? (Land filtering is the practice of motorcycles moving between stopped or slow moving cars)
Further research is needed to determine the effectiveness of this strategy in improving road safety. As this has been introduced relatively recently in other jurisdictions such as NSW it would be appropriate to seek outcomes of any evaluation.
Should we strengthen the licensing system to reduce the risk for novice riders?
Yes, this should be the same as the rest of Australia.

Should we invest in a community education and awareness campaign?
Yes

Should we mandate rider training courses?
Yes

**Heavy vehicle and cycling safety and other key actions**

Does the heavy vehicle licensing system in the NT need to change?
Yes, there should be much greater use of the railway, which is much more cost-effective and environmentally sound, in addition to being safer than road transport. Significant increases in licensing costs could provide an incentive for businesses to use the railway rather than road for freight.

Should we introduce laws for a minimum passing distance for vehicles overtaking cyclists?
Yes, many strategies are needed to increase the perception of and actual safety to cyclists. Environmental modifications should also be considered which take cyclists off the road and onto cycle paths; road verges should be made wider to allow for cyclists and be kept clean and tidy.

Cyclist deaths reduce as the proportion of journeys by cycle increases (15), so a strong emphasis on all aspects of promotion of cycling as fast, healthy, affordable; reducing congestion so of benefit to all road users; and reducing air pollution so of benefit to everyone. Despite the deaths of cyclists on the road, overall mortality of cyclists is lower than non-cyclists(16), and will continue to fall as more people cycle.

There are benefits for younger people of cycling, so changing aspirations from car ownership and driving, to bike ownership and cycling will have short and long term healthy, mobility and environmental benefits.

How can we better support community groups and organisations to help keep their people safe?
A significant increase in the proportion of trips made by cycle would increase safety. Providing priority road use for cyclists; reducing urban speed limits; ensuring adequate, weather-protected facilities for bike storage and changing clothes would all increase the appeal of cycling. The lack of hills and small size of NT communities are additional incentives for cycling.

Should we invest in the education and awareness of driving safer vehicles?
Better investment in public transport and active transport infrastructure to reduce road use may be a better overall health investment than driving safer vehicles. Helping people to move from older and poorly maintained vehicles is also of value. Each cyclist and pedestrian reduces vehicles and emissions, normalises active transport, and reduces health burden related to lack of physical activity, exhausts, and ultimately climate change.

Should we invest in research to greater understand attitudes and behaviours of our road users?
Yes, this should be considered over a long timeframe with good financial support to grow local research relevant to the NT. Importantly, the strategy highlights the over-representation (ratio 5:3) of Aboriginal people in road fatality statistics, and presents a range of strategies to address these. However the even greater over-representation of males (ratio 2:1) in road fatality statistics is understated. This may highlight a psychological distancing of road trauma by non-Aboriginal people, while men are unable to wholly acknowledge that maleness is an even greater risk. Aboriginal males are in both groups, and strategies targeting Aboriginal men are particularly needed. We note also the extraordinary rate of imprisonment of Aboriginal men – 14% of men in the age group 20 to 34 are in prison(17), and that punitive approaches that
lead to imprisonment of Aboriginal people are not contributing to overall strengthening of NT population. Further sanctions unlikely to be of overall benefit to the Aboriginal or broader communities; community development approaches that empower, and provide accessibility and transport options are required.

**What else could we be doing to reduce the death and injury on our roads?**

Rather than consider road safety and reducing death and injury on our roads as an issue in isolation, PHAA suggests broader review of accessibility and transport.

With improved telecommunications, there may be less need for travel. With options for shift work and flexible hours there may be opportunities to spread the transport over a longer period so there are less vehicles on the road during peak periods.

Active transport has innumerable benefits over private motor vehicle transport. These include both individual and community health through increased physical activity and reduced air pollution. Less vehicles on the road will increase amenity, reduce cost of road maintenance, reduce the need for provision of parking, reduce congestion, reduce noise and increase safety of pedestrians.

Walking can be increased through enhancing infrastructure (walkways, traffic indicators, Green spaces and car free zones), public education linking multiple benefits of walking; prioritisation of pedestrian ways; and provision of water fountains including water-bottle filling stations. People who usually walk to and from work each day experience considerable health benefits, including 25% lower death rates than people who drive\(^\text{16}\). However pedestrian safety is an important consideration.

Pedestrians have been neglected in this consultation despite them being disproportionately represented in NT road toll. Australia-wide, pedestrians have benefited less from increasing road safety over recent decades. Pedestrian safety can be enhanced through reducing alcohol consumption, reducing cars and speed on roads, enhancing pedestrian infrastructure, and greater public awareness.

Cycling can be increased through bike hire schemes, bike carriage capacity on buses, education and awareness. Cyclist mortality is about 40% lower than that of drivers, including risks associated with cycling. Rather than educating about safer car use, education about avoiding car use altogether will achieve many co-benefits\(^\text{16}\). Building cycle ways are also part of the solution and also encourage tourists to move off roads.

Better public transport will also increase road safety, and this includes both urban and inter-urban travel. The Ghan railway has never been considered as the backbone of transport in NT, and since the rail was constructed there have been new opportunities to increase the frequency and possibly speed of trains. Regular 24 hour services between Darwin and Alice Springs, going through Tennant Creek and Katherine could be a major cost saving for government employees. If telecommunications were installed on the train then travel time could be profitably used.

Increasing the frequency of public transport to remote communities, including both buses and subsidised flights will increase safety, and reduce vehicles on remote roads, including reducing costs and emissions, and reduce the need for road upgrades.

Fatigue has been widely considered a contributor to road crashes, often in combination with other factors such as youth, alcohol, long-haul driving and unfamiliar routes. Interventions to reduce fatigue include education around better journey planning, sharing driving responsibilities and breaking up the journey. These may be particularly relevant for visitors. The government funded free-coffee for driver intervention may have been effective but was ended without evaluation, despite evidence that caffeinated beverages can reduce crash risk\(^\text{18,19}\).
Conclusion

PHAA supports the broad directions of the Towards Zero Consultation. However, we are keen to point to a much broader consultation than road safety in isolation, in line with this submission. We are particularly keen that the following points are highlighted:

- Focus beyond road safety on access and reducing the need for motorised travel will have benefits in many sectors. The concurrent inquiry into alcohol legislation is an example of how mutually supporting policy to reduce alcohol consumption overall will increase road safety for all road users. The overarching goals of mobility, equity and sustainability should be borne in mind.
- Investment in active travel infrastructure will achieve reduced road deaths, complemented by benefits in reduced rates of cancer and cardiovascular disease, safer roads, less air pollution, greater urban amenity, greater equity and reduced crime.
- Investment in public transport, including inter-urban transport will enhance the safety and wellbeing of Aboriginal people. While there may be an initial outlay, this initiative will increase employment, particularly for unskilled and semi-skilled people, and driving may be a particularly attractive employment opportunity for Aboriginal people whose employment opportunities are so limited.
- The Adelaide to Darwin railway is already built and there could be much greater use of this investment.
- Investment into local research over a long term to support road safety in the NT

The PHAA appreciates the opportunity to make this submission and the opportunity, and we look forward to participating in further discussions on this issue.

Please do not hesitate to contact us should you require additional information or have any queries in relation to this submission.

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References