



## REDUCING DEFAULT SPEED LIMITS OUTSIDE OF BUILT-UP AREAS CONSULTATION REGULATORY IMPACT ANALYSIS

### AUSTRALIAN TRUCKING ASSOCIATION SUBMISSION 10 NOVEMBER 2025

#### 1. About the Australian Trucking Association

The Australian Trucking Association is a united voice for our members on trucking issues of national importance. Through our eleven member associations, we represent the 60,000 businesses and 200,000 people who make up the Australian trucking industry.

#### 2. Introduction and summary

In September 2025, the Australian Government Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCSA) opened consultations on its consultation regulatory impact analysis (C-RIA) on reducing default speed limits outside urban areas.<sup>1</sup>

Table 1 sets out the options that were considered.

**Table 1: Options considered in the C-RIA<sup>2</sup>**

| Number                | Option description                                 |
|-----------------------|--|
| <i>Sealed roads</i>   |  |
| 1                     | 90 km/h default speed limit outside built up areas |
| 2                     | 80 km/h default speed limit outside built up areas |
| 3                     | 70 km/h default speed limit outside built up areas |
| <i>Unsealed roads</i> |  |
| 1                     | 80 km/h default speed limit outside built up areas |
| 2                     | 70 km/h default speed limit outside built up areas |

In the ATA's view, **governments should not reduce default speed limits**. They should not go ahead with any of the C-RIA options.

Speed management is a critical road safety issue, but the RIA does not examine the expected safety benefits of speed reductions in sufficient detail (section 3). It does not capture all the cost and productivity impacts of reducing speed limits across the whole of the non-signed road network (section 4).

<sup>1</sup> DITRDCSA, [Reducing default speed limits outside of built-up areas](#). 29 September 2025.

<sup>2</sup> *ibid*, table 1. 9.

Instead of the RIA options, the ATA recommends that governments—

- implement targeted speed reductions and treatments through a \$50 million per year increase in National Black Spot program funding. Table 2 in this submission shows that treating road safety black spots can deliver a benefit cost ratio of 9.6, compared to the 2.2 BCR of the preferred option in the RIA
- invest another \$500 million per year in local road maintenance through the Roads to Recovery program
- carry out an ongoing public education campaign about speeding.

The options we are proposing would improve safety without the productivity cost of increasing travel times across Australia’s regional, rural and remote roads.

### **3. The analysis of the expected safety benefits of speed reductions is not detailed enough**

Speed management is a key road safety issue. The ATA was an early advocate of mandatory truck speed limiters<sup>3</sup> and campaigned for average speed cameras in New South Wales to be used to enforce speed limits for cars as well as trucks.<sup>4</sup>

Higher speeds increase both the likelihood of a crash and the severity of crashes that occur, as the RIA notes.<sup>5</sup> Small increases in speed have a big impact, because the kinetic energy that needs to be dissipated in a crash increases with the square of the vehicle’s speed.

Although the science of speed related crashes cannot be disputed, it is difficult to assess the impact of a widespread change in speed limits. The RIA’s approach to the assessment is very high level and is not sufficiently detailed.

#### **The existing road and road safety datasets have significant limitations**

The RIA emphasises the critical importance of only including vehicle kilometres travelled (VKTs) on roads with default speed limits, to avoid overestimating the costs and benefits associated with the proposed change.

It then goes on to state that—

data in this area is scarce to non-existent, as most traffic counts and speed data are collected from locations where speed limit signs are present, creating a bias that underrepresents travel on default roads.<sup>6</sup>

There are similar issues with calculating the proportion of fatal and serious injuries that occur on sealed roads with default speed limits. The data is not available from police reports, so

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<sup>3</sup> Rocke, P. et al, *Putting safety first: a history of the Australian Trucking Association*. Focus, 2011. 31.

<sup>4</sup> Watson, N. [NSW point-to-point speed cameras must apply to all vehicles](#). Media release, 4 November 2016.

<sup>5</sup> DITRDCSA, 2025. 23.

<sup>6</sup> *ibid*, 45.

the RIA analysis used state government estimates. The Queensland estimate covered a range from three to 25 per cent.<sup>7</sup>

### **Truck drivers are trained to drive to the conditions**

The RIA argues that its modelled options would lead to a reduction in travel speeds on unsealed roads, on the grounds that—

- high speeds are likely on a substantial proportion of unsealed roads with default speed limits
- the associated national publicity campaigns that would necessarily accompany any future changes would increase speed awareness and likely lead to lower speed choices by drivers.<sup>8</sup>

ATA members question these arguments, because truck drivers operating in remote areas are trained to drive to the road conditions.<sup>9</sup> For example—

- On 9 September 2025, a B-double operated by an NTRTA member travelled at an average speed of 28.1 km/h during the 197 kilometre journey from Beswick to Bullman on the unsealed Central Arnhem Road. Changing the speed limit on the road would not have affected the driver's speed choices
- On corrugated unsealed roads, one ATA member recommends choosing a legal speed that synchronises with the road corrugations to minimise driver discomfort. Changing the default speed limit would not affect the characteristics of the road or the speed that works best for its condition.

### **The modelling approach does not consider driver fatigue**

The RIA models potential reductions in fatal and serious injuries using Nillson's power law, which applies a power factor to mean travel speeds before and after a proposed speed change.<sup>10</sup>

The p factors used in modelling – 5.493 for fatalities and 3.951 for serious injuries – are drawn from a 2019 meta-analysis of 49 studies.<sup>11</sup> These included five studies from Australia, but—

- two were about the introduction of speed cameras
- another two dealt with the reduction of urban speed limits from 60 km/h to 50 km/h, and are not relevant to considering non-urban speed limits, and

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<sup>7</sup> *ibid*, 51.

<sup>8</sup> *ibid*, 53.

<sup>9</sup> Northern Territory Road Transport Association (NTRTA), *Consultation regulatory impact analysis – default speed limits*. Submission to DITRDCA, 21 October 2025. 2.

<sup>10</sup> DITRDCA, 2025. 49.

<sup>11</sup> *Ibid*.

- the final study evaluated the reduction in the speed limit on some South Australian roads from 110 km/h to 100 km/h.<sup>12</sup> Trucks are already speed limited at 100 km/h.

None of the studies considered the effect of extending the time required to complete long trips on driver fatigue and fatigue related crashes.

#### **4. The RIA does not fully consider the cost and productivity impacts of reducing default speed limits**

Responds to C-RIA questions:

- **Does the RIA establish a case for amending the default speed limits in the ARR?**
- **Are there any additional data that ought to have been considered when constructing the baseline FSI, VKT, efficiency and fuel costs?**
- **Is the approach to measuring the impact of policy change appropriate? Where assumptions have been made, do you have any specific alternative assumptions that ought to have been considered?**

After the publication of the RIA, it was noted that the proposed reduction in default speed limits would increase the length of a 30 minute transit by around the duration of a Taylor Swift track.<sup>13</sup>

There aren't many 30 minute transits on non-signed roads in rural and remote Australia, and in any case trucking businesses operate trucks all day.

ATA members have raised significant concerns about the impact of the options on productivity. The Livestock and Rural Transporters Association of SA noted that—

(...) long haul drivers are already restricted by fatigue management rules limiting them to 12 or 14 hours behind the wheel each day. Speed limits will cut those hours reducing total distances and thereby creating a notable loss of productivity and further increases in cost if additional drivers need to be employed in an industry of shortage.<sup>14</sup>

Western Australian trucking operators raised similar productivity concerns, including that—

- delivery delays through lower speeds may cause delays in meeting delivery curfews or deadlines, which could have significant consequences for time-sensitive freight like livestock
- livestock vehicles would need to transport additional feed and water

<sup>12</sup> Elvik, R. et al, "Updated estimates of the relationship between speed and road safety at the aggregate and individual levels," in *Accident Analysis and Prevention* 123. 2019, 114–122.

<sup>13</sup> Power, J. and N Gladstone, "[How an extra Taylor Swift track on open roads could save your life](#)," in *Sydney Morning Herald*, 4 October 2025. Viewed 24 October 2025.

<sup>14</sup> Edmonds, P. *Submission for status quo for rural speed limits*. LRTASA submission, 22 October 2025.

- there are not enough layover areas for drivers to park up now. More would be needed, given that they would need more time-based breaks to complete each trip. These costs need to be included.<sup>15</sup>

In addition to these issues, the ATA has technical concerns about the RIA's approach to modelling travel time costs.

### **The modelling should include multi-combination vehicles**

The largest vehicle type used in the time value assessment is a six-axle articulated truck,<sup>16</sup> even though many operations on rural and remote roads involve multi-combination vehicles.

The ATA understands that the scope of the analysis was restricted to rigid/articulated trucks because of data limitations. These should be addressed by adopting the detailed VKT figures from the National Transport Commission's PAYGO model.<sup>17</sup>

### **The travel time parameter values should be reconsidered**

The RIA models the cost of increased travel times using the standard travel time parameters in the Australian Transport Assessment and Planning (ATAP) Guidelines, adjusted from 2013 to 2025 dollars<sup>18</sup>

While the ATAP parameters offer a consistent approach to assessing transport proposals, the values used in the RIA need to be reconsidered. This is because—

- the ATAP travel time values for commercial vehicle crews are based on the *Road Transport and Distribution Award* as it stood in 2013.<sup>19</sup> Wage rates under the award have increased 47 per cent since 2013<sup>20</sup> against a CPI increase of 38 per cent<sup>21</sup>
- the crew values use the 2013 super guarantee rate, 9.25 per cent.<sup>22</sup> It is now 12 per cent<sup>23</sup>
- given the distances involved and the need to include multi-combination vehicles in the modelling, it would be appropriate to incorporate the relevant wage rates from the *Road Transport (Long Distance Operations) Award* into the crew values as well
- the freight travel time values were ultimately derived from a survey that looked at three consignment types: inter-capital full truck loads, metropolitan full truck loads

<sup>15</sup> Information provided by WRF.

<sup>16</sup> DITRDCSA, 2025. Table 36. 63.

<sup>17</sup> NTC, [PAYGO heavy vehicle charges model](#). MS Excel workbook, June 2021. Table I.3.5.

<sup>18</sup> DITRDCSA, 2025. 63.

<sup>19</sup> ATAP Guidelines, [Value of travel for commercial vehicle occupants](#). s 3.1.3. Viewed 22 October 2025.

<sup>20</sup> *Road Transport and Distribution Award 2020*, s 17.1(a).

<sup>21</sup> ABS, [Consumer price index, Australia](#). Calculated using All groups CPI, Australia, June qtr 2013 and 2025.

<sup>22</sup> ATAP Guidelines, s 3.1.3.

<sup>23</sup> Australian Taxation office, [Super guarantee](#). Viewed 22 October 2025.

and metropolitan multi-drop services.<sup>24</sup> These are not relevant to rural freight operations.

## 5. There are other feasible options that have not been considered

Responds to C-RIA questions:

- Does the RIA present clear, well differentiated options that can achieve the stated policy objective?
- Are there any other feasible options to address the problems identified in the previous chapter that have not been assessed in the RIA and should be considered?

The regulatory impact analysis guide requires that analyses identify a range of genuine and viable alternative policy options.<sup>25</sup>

The RIA cites this requirement and then concedes that it does not comply with it—

The OIA Guidelines require that a RIA identifies a range of viable options, including, as appropriate, non-regulatory, self-regulatory and co-regulatory options. As noted above, this RIA will focus the discussion of alternative approaches to options that relate to managing default speed limits outside built-up areas.<sup>26</sup>

The ATA considers that the RIA should examine three further options in detail—

- targeted speed reductions and safety treatments where necessary (ATA option 1)
- increased investment in road upgrades and maintenance (ATA option 2)
- an ongoing public education campaign about speeding (ATA option 3).

### ATA option 1: targeted speed reductions and safety treatments

The options modelled in the RIA would reduce speed limits on every non-signed non-urban road, including on well built and maintained roads where a speed limit reduction may not be warranted. The cost of the increased travel time and lost productivity involved in the options would be far higher than necessary.

ATA option 1 proposes targeting speed limit reductions and treatments at well-defined locations where the measures would deliver large safety benefits.

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<sup>24</sup> Austroads, [Economic evaluation of road investment proposals: valuing travel time savings for freight](#). AP-R230/03, 2003. i.

<sup>25</sup> Office of Impact Analysis (OIA), [Regulatory impact analysis guide for ministers' meetings and national standard setting bodies](#). June 2023. 18.

<sup>26</sup> DITRDCA, 2025. 34.

The RIA briefly considers, and dismisses, targeted safety treatments.<sup>27</sup> But as table 2 shows, they can have higher benefit-cost ratios than the default speed limit changes examined in the RIA.

**Table 2: BCRs of selected safety treatments on rural roads, 7 per cent discount rate**

| Treatment  | BCR |
|--|-----|
| Barriers   | 2.5 |
| Warning signs  | 9.6 |
| Line marking   | 6.6 |
| <i>Preferred RIA option: 80 km/h default speed limit</i> | 2.2 |

Sources: BITRE, [Evaluation of the National Black Spot Program](#). Report 126, 2012. V 1, 145; DITRDCSA 2025, 13.

The safety treatments would be delivered by expanding the National Black Spot program.

In 2023, the Australian Government announced that Black Spot funding would increase progressively from \$110 million per year to \$150 million per year.<sup>28</sup> The ATA proposes that funding be increased to \$200 million per year.

## ATA option 2: increase spending on road upgrades and maintenance

In its submission on the RIA, the Northern Territory Road Transport Association (NTRTA) pointed out that—

Reducing default speed limits does not address a critical underlying issue; that of poorly maintained roads due to insufficient or inadequate maintenance funding. Poorly maintained roads pose a far greater risk to safety than speed itself. In the NT to reduce the risk of fatalities and serious injuries priority must be given to increase funding for repairs and maintenance of severely degraded road infrastructure.<sup>29</sup>

The Grattan Institute reported in 2023 that governments were underspending on road maintenance by at least \$1 billion dollars per year.<sup>30</sup> Its analysis concluded that a typical regional council underspent its budget by 42 per cent. The underspend in remote areas was more than 75 per cent.<sup>31</sup>

In the same announcement as its increase in Black Spot funding, the Government announced that it would increase Roads to Recovery funding from \$500 million per year to \$1 billion per year.<sup>32</sup>

<sup>27</sup> *ibid*, 34-35.

<sup>28</sup> King, C et al. [Significant boost for road safety](#). Joint media release, 19 November 2023.

<sup>29</sup> NTRTA, 2025. 1.

<sup>30</sup> Terrill, M. et al. [Potholes and pitfalls: how to fix local roads](#). Grattan Institute, November 2023. 16.

<sup>31</sup> *ibid*, 8.

<sup>32</sup> King, 2023.

While the ATA welcomes this funding increase, it does not go far enough. In addition to the safety benefits, maintaining non-urban roads better and upgrading them would—

- support the trucking industry’s productivity by enabling the increased use of longer, heavier trucks. In 2019, modelling conducted for the ATA showed that increasing high productivity vehicle access to the road system could reduce the industry’s operating costs by \$13.6 billion in NPV terms over the years to 2050 and save a typical Australian household more than \$400 per year on their everyday purchases<sup>33</sup>
- reduce the cost of truck maintenance and repair. Businesses quoting on remote contracts commonly multiply their usual maintenance and tyre costs by 2.5 to get a workable estimate<sup>34</sup>
- improve the resilience of the road system and freight networks as Australia’s climate gets worse. The 2022 floods caused extensive disruption and an estimated \$3.8 billion in damage to the road system.<sup>35</sup> Building better roads, now, would reduce the cost and disruption of future natural disasters.

To get these results, the Government should increase Roads to Recovery spending by a further \$500 million per year.

### **ATA option 3: a strong public education campaign about speeding**

The RIA dismisses the effectiveness of educational campaigns on the grounds that—

Alternative non-regulatory approaches (including infrastructure upgrades and education campaigns) remain important but typically deliver lower safety returns per dollar invested and prove insufficient without complementary speed guidance.<sup>36</sup>

The RIA later argues that reducing speed limits would necessarily require a national publicity campaign to increase speed awareness,<sup>37</sup> with the campaign needing to be on the same scale as the Government’s 2024-25 national road safety education and awareness campaign.<sup>38</sup>

Since the options examined in the RIA include a requirement for a publicity campaign, the ATA considers that this should be modelled as a separate option.

The assessment of the option should in our view be based on the success of the NSW RTA’s award-winning ‘Pinkie’ campaign. A comparison of NSW road fatalities before and

<sup>33</sup> Deloitte Access Economics, [Economic benefits of improved regulation in the Australian trucking industry](#). March 2019. vi, 46.

<sup>34</sup> Information provided by NTRTA.

<sup>35</sup> Australian Local Government Association (ALGA), [Building better roads will prevent another \\$3.8 billion blowout](#). Media release, 8 December 2022.

<sup>36</sup> DITRDCSA, 2025. 31.

<sup>37</sup> *ibid*, 53.

<sup>38</sup> *ibid*, 64.

after the campaign showed a 32 per cent decrease in speed related fatalities, a 30 per cent decrease in fatalities from young driver crashes and a 45 per cent decrease in fatalities from speeding young driver crashes.<sup>39</sup>

## 6. ATA recommendation

**Responds to C-RIA question: which is your preferred option and why?**

The ATA recommends that governments implement **ATA options 1-3**, to deliver—

- targeted speed reductions and treatments, but only where they are necessary
- increased investment in regional and remote road upgrades and maintenance
- an ongoing public education campaign about speeding.

Implementing these options would deliver safety benefits without the travel time and productivity cost of reducing speed limits across vast swathes of regional, rural and remote Australia.

In addition to the safety benefits, ATA option 2 would deliver increased productivity, lower maintenance costs for operators and increase the resilience of the road network to natural disasters.

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<sup>39</sup> Watsford, R. "The success of the 'Pinkie' campaign – Speeding. No one thinks big of you: a new approach to road safety marketing," in *2008 Joint ACRS-Travelsafe National Conference – non-peer reviewed papers*. 390-395.