GLOBAL
ROAD SAFETY
PARTNERSHIP

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Attention: speedrule@transport.govt.nz

New Zealand draft Land Transport Rule: Setting of Speed Limits 2024 Submissions – Global Road Safety Partnership (GRSP)

These submissions are made by the Global Road Safety Partnership (GRSP), a hosted programme of the International Federation of Red Cross and Red Crescent Societies (IFRC). The work of the GRSP has been repeatedly acknowledged and welcomed within successive UN resolutions and political declarations[1]. GRSP has been active in improving global road safety for over 25 years (refer link).

These submissions are made with the knowledge that they may be made public. They are not commercially sensitive.

Before providing specific comment on the draft Rule, the following broader context is provided. Document links or footnotes to referenced documents have been included.

New Zealand, as a member country of the United Nations (UN), has commitments to UN Resolutions, Political Declarations, and the Sustainable Development Goals (SDGs). This submission references several UN commitments relevant to the draft Rule and explains relevant global best practice speed related publications that have recently been released.

1. International Road Safety Commitments

Commitment to UN Resolutions and Political Declarations signifies a country's dedication to adhering to the principles, guidelines, and objectives established by the international

[1] UN Resolution adopted by the General Assembly on 31 August 2020 – A/RES/74/299 - Clause 34 and Political Declaration of the High-Level Meeting on Improving Global Road Safety "The 2030 horizon for road safety: securing a decade of action and delivery" – Clause 16

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community through the UN. When a country commits to these, it is pledging to align its policies and actions with agreed-upon standards and to cooperate in implementing them.

Committing to UN resolutions and declarations indicates respect for international norms and the rule of law. It shows a willingness to participate in the global governance system and to contribute to collective efforts to address global challenges.

Such commitment underscores a country's readiness to engage in multilateralism and cooperate with other nations to achieve common goals. It helps in fostering diplomatic relations and collaborative efforts.

It requires the country to adjust its national policies and practices in accordance with the principles and objectives outlined in the resolutions and declarations. This might involve legislative changes, administrative actions, and other measures to ensure compliance.

Committing to these documents often involves mechanisms for reporting and accountability, where countries are expected to report on their progress and implementation efforts. As examples, countries commit to providing road safety related data to the World Heath Organisation (WHO) for the purposes of preparing the Global Status Report on Road Safety and monitoring achievements toward the 12 Voluntary Global Targets for Road Safety.

When a country fails to act on UN resolutions and political declarations, several forms of reputational damage can occur. For example, there can be a loss of credibility as non-compliance can lead to a loss of reputation on the international stage. Other countries may perceive the non-compliant country as unreliable or untrustworthy, affecting its ability to negotiate and form alliances. There can also be negative public perceptions domestically and internationally and the country's image can suffer. Citizens may lose trust in their government, and international public opinion might view the country negatively,

In summary, commitment to UN resolutions and political declarations are important and essential for a nation to maintain its international reputation and standing. The consultation document incorrectly states that:

> *"The new Rule will have no direct impact on our international circumstances or obligations in respect of land transport safety."*

1.1 Stockholm Declaration - Third Global Ministerial Conference on Road Safety: Achieving Global Goals 2030 Stockholm, 19–20 February 2020

The Stockholm Declaration was prepared in close collaboration with the conference's steering group. The Declaration went through extensive consultation with WHO Member States through their permanent representations in Geneva, and transparent and inclusive public consultation open to everybody around the world.

Building on the Moscow Declaration of 2009 and the Brasilia Declaration of 2015, UN General Assembly and World Health Assembly resolutions, the Stockholm Declaration is ambitious and forward-looking and connects road safety to the implementation of the 2030 Agenda for Sustainable Development.

This Declaration includes clear commitments to the goal of halving global road crash deaths and injuries between 2011 and 2030.

Clause 11 of the Declaration includes the commitment to:

> *"Focus on speed management, including the strengthening of law enforcement to prevent speeding and mandate a maximum road travel speed of 30 km/h in areas where vulnerable road users and vehicles mix in a frequent and planned manner, except where strong evidence exists that higher speeds are safe, noting that efforts to reduce speed in general will have a beneficial impact on air quality and climate change as well as being vital to reduce road traffic deaths and injuries;"*

Lowering speed limits brings an array of direct and indirect benefits, not only for safety, but for public health, environmental protection, transport efficiency, equity, economic growth and well-being, as well as community livability. The 2020 Stockholm Declaration highlights the link between road safety and more comprehensive societal benefits and connects it to the SDGs.

The Stockholm Declaration reflects the recommendations of the conference's Academic Expert Group and its independent and scientific assessments of progress made during the Decade of Action for Road Safety 2011-2020 and its proposals for a way forward.

The Academic Expert Panel produced, *'Saving Lives Beyond 2020: The Next Steps Recommendations of the Academic Expert Group for the 3rd Global Ministerial Conference on Road Safety (2019)'* (link).

The report provides a range of important recommendations that relate directly to issues of effective speed management. These include:

> *"…road safety is no longer a need that can be compromised or traded-off in order to achieve other social needs. It implies, for example, that the safety risks inherent in raising speed limits should not be tolerated in order to realize economic benefits of faster traffic, and that investments necessary to improve road safety should not be diverted for other needs (Page 20); and*
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> *Speeds in a Safe System are set so that vehicle and road design features can limit crash forces to human injury tolerance limits. For example, vehicles that meet UN or equivalent national standards are designed to limit crash forces to their occupants to survivable levels in side impacts up to collision speeds of 50 km/h. Therefore, a Safe System would limit speeds to 50 km/h or less on roads with intersections where side impacts can be expected.*
>
> *Standards require that vehicles limit crash forces to their occupants to survivable levels in frontal crashes up to 70 km/h. Consequently, speed limits should be set to 70 km/h or less on roads where there is no centre barrier and head-on collisions are possible and where no pedestrians or other types of vulnerable road users are present.* (Pages 52 and 53): and
>
> *The relationship between speed and the probability and severity of crashes has been well researched both in theory and practice. In general, higher speeds increase both the likelihood of crashing and the severity, though the magnitude of the effect varies according to the absolute speed and environmental circumstances. Studies have shown that relatively small changes in travel speeds can result in substantial changes in death or injury in crashes. A review of empirical*

studies from ten countries by the International Transport Forum confirms the theoretical relationship and demonstrates that:

- *Reducing travel speeds by just a few km/h can greatly reduce the risks and severity of crashes.*
- *Conversely, a study of speed limit increases over a 25-year period in the United States published by the Insurance Institute for Highway Safety found that speed limit increases between 1993 and 2017 were responsible for 36,760 deaths (3.8 percent of the total), with 1,900 lives (5.2 percent) lost in 2017.*

Vehicle speeds are directly linked to a number of SDGs and this opens the potential for new partners to support the implementation of speed management methods. While the most direct link to speed would be the road safety targets 3.6 and 11.2, there are also strong links to Goal 5, Gender Equality and Goal 10, Reduced Inequalities due to the improved perception of safety for vulnerable road users that is associated with lower road speeds in populated areas. A higher level of perceived safety is likely to lead to greater mobility and expanded opportunities for social needs including education (Goal 4) and employment (Goal 8).

Vehicle speeds are also related to environmental noise levels. A 2017 study used a comprehensive national noise measuring campaign in the UK and a refined methodology to measure traffic noise and found that 30 km/h road speeds reduced acoustic energy levels by about half. Environmental noise has been linked to sleep disorders, heart disease, stress and, among children, decreased school performance, including decreased learning, lower reading comprehension and concentration deficits. "

Under, 'Actions and responsibilities' recommendation seven specifies (Page 54):

"Speed limits in a Safe System need to be determined according to the principles described above, and system owners – the officials who set the standards for road design and vehicle safety – must take responsibility for integrating effective speed management methods to ensure that vehicles remain in compliance. A variety of methods can be used to control speeds, including:

- *appropriate speed limits determined according to a Safe System approach."*

GRSP particularly highlight this important recommendation:

"The best approaches for ensuring compliance with safe speeds will be consistent with Safe System principles." (Page 54)

1.2 UN General Assembly Resolution – Improving global road safety (Resolution Link)

On 31 August 2020, the UN General Assembly adopted resolution A/RES/74/299 on *Improving Global Road Safety*. The resolution was based on the Stockholm Declaration agreed at the 3rd Global Ministerial Conference on Road Safety in February 2020.

The key elements included proclaiming a Second Decade of Action for Road Safety 2021 – 2030 with a new target to reduce road deaths and injuries by 50% by 2030, It encourages Member States to take a "safe system" and vision zero approach promoting an evidence-based, data-led approach as well as a wide range of other recommendations.

1.3 Political Declaration of the UN High-Level Meeting on Improving Global Road Safety (Declaration Link)

A sweeping political declaration on global road safety was unanimously adopted by the UN General Assembly on 30 June 2022 which committed to a range of actions aimed at reducing road traffic deaths by at least 50 per cent by the year 2030 (UN Link).

The 193-member Assembly committed to both implement a "safe system" approach and drive the implementation of the Global Plan for the Decade of Action for Road Safety 2021–2030 (Global Plan Link).

The Global Plan provides specific recommendations with respect to speed management that are consistent with "safe system" principles as follows:

- Implement policies that lower speeds, and prioritize the needs of pedestrians, cyclists, and public transport users (Page 11)
- Implement infrastructure treatments that ensure logical and intuitive compliance with the desired speed environment (e.g. 30 km/h urban centres; ≤ 80 km/h undivided rural roads; 100 km/h expressways). (Page 13)
- In densely populated urban areas, there is strong evidence that even the best road and vehicle design features are unable to adequately guarantee the safety of all road users when speeds are above the known safe level of 30 km/h. For this reason, in urban areas where there is a typical, predictable mix of road users (cars, cyclists, motorcyclists, and pedestrians), a maximum speed limit of 30 km/h (20 mph) should be established, unless strong evidence exists to support higher limit. (Page 20)

The unanimous adoption of the Political Declaration and the Global Plan commits countries to policies that 'lower speeds' and speed limit setting principles as described above.

2. Recent Globally Recognised Publications

2.1 Speed Management Manual

The *'Speed Management Manual – a road safety manual for decision makers and practitioners'* was jointly published by the GRSP, the WHO, the World Bank and the FIA Foundation in 2023. The manual sets out the evidence as it relates to 'survivable' impact speeds and setting speed limits that are consistent with "safe system" principles as follows:

Table 1 Survivable impact speeds for different crash scenarios

Type of road/road section	Safe System speed
Roads/road sections with possible crashes between cars and vulnerable road users	Max. 30 km/h
Roads/road sections with intersections with possible side-on crashes between cars	Max. 50 km/h
Roads/road sections with possible frontal (head-on) crashes between cars	Max. 70 km/h
Roads/road sections with no likelihood of side-on or frontal crashes between cars	Max. 100 km/h

2.2 Guide for Safe Speeds - Managing Traffic Speeds to Save Lives and Improve Livability (2023)

The Guide (refer link), published by the World Bank comprehensively explains the economic benefits of effective speed management and also counters claims that higher speeds equate with economic benefits. The World Bank plays a critical role in advancing economic development through various means and the production of the Guide provides detailed technical advice on effective speed management.

In summarising the broader benefits of lowering speed limits (Page 14), the World Bank report that lowering speed limits brings an array of direct and indirect benefits, not only for safety, but for public health, environmental protection, transport efficiency, equity, economic growth, and well-being, as well as community livability. Referencing the 2020 Stockholm Declaration, it highlights the link between road safety and more comprehensive societal benefits and connects it to the UN SDGs.

3. Comments on Specific Proposals

Proposal 1 – Require cost benefit analysis for speed limit changes

Following accepted "safe system" methodoloy, the philosophy that should be applied is that no death or serious injury is acceptable. Therefore, the Rule should preclude any changes that would increase the numbers of deaths or serious injuries. There is abundant evidence that shows the correlation between higher mean travel speeds and higher rates of road trauma. To apply a methodoloy that trades off lives and serious injuries would be unacceptable and jeopardise the commitments that New Zealand has made.

Proposal 2 – Strengthen consultation requirements

While consultation is important, the process must be considered within the context of "safe system" based speed limit setting principles. Further, to meet New Zealand's Treaty of Waitangi obligations, consultation must specifically include relevant iwi.

Proposal 3 – Require variable speed limits outside school gates

The speed limits as proposed are supported. The time periods as proposed do not take account of the realities that schools frequently have children arriving and departing outside the stated times. Schools are often used for out of school hour and non-school day activities and children may arrive or depart at a wide variety of times. Schools should have the discretion to activate lower speed limits at any other times and days of the week that are relevant to the use of school grounds. Many urban schools are in locations that require 30 km/h speed limits to comply with "safe system" principles and these should be permanent rather than variable.

Proposal 4 – Introduce a Ministerial Speed Objective

This proposal could be supported, provided there is a clear explanation of how Ministerial speed objectives would directly align with "safe system" principles and New Zealand's commitments to relevant Resolutions, the Political Declaration, the Global Plan and evidence-based speed limit setting principles.

New Zealand's international commitments include reducing speed to reduce road trauma. The only exception to this would be where road infrastructure has been upgraded that

would allow for a speed limit to be safely raised. As an example, where a non-median divided rural connector road is upgraded to 'expressway' standards (e.g. median divided, side barriers, no presence of pedestrians or cyclist and other essential safety criteria), increasing a speed limit to a maximum of 100 km/h could be envisaged.

Proposal 5 – Changes to speed limits classification

This proposal is strongly opposed and is not consistent with good international practice that sets 'survivable' speed limits that meet "safe system" principles.

Please refer to (Annex A)*'Guide for Safe Speeds - Managing Traffic Speeds to Save Lives'* produced by the Global Road Safety Facility of the World Bank and published in 2024 (World Bank Manual). This manual provides internationally recognised up to date and robust information to inform evidence-based speed limits. Changes to speed limit classification are strongly recommended as provided in Annex A.

This proposal would result in New Zealand significantly deviating from good practice speed management which would result in increasing numbers killed and seriously injured in crashes. To put aside the evidence, good practice and globally applicable recommendations would be irresponsible and work against New Zealand's international commitments. The proposal sets out a series of speed limits that are generally not evidence based and would, if implemented, result in increased levels of road trauma.

Proposal 6 – Update the Director's criteria for assessing speed management plans and certification

As per responses provided, the proposal is not supported as Proposals 1 to 5 are not consistent with accepted good practice.

The proposal could be supported if each of the elements as per submissions provided to Proposals 1 to 5 were aligned with accepted "safe system" practices.

Proposal 7 - Reverse recent speed limit reductions

New Zealand has demonstrated excellent recent progress in reducing speed limits to those closer to internationally recognised good practice. There are a number of examples that have demonstrated the lifesaving impact and injury reduction benefits of these speed limit reductions.

The Auckland Safe Speeds Programme[2] has set speed limits more aligned to "Safe System" speeds on more than 2900km of rural and urban roads. Two years later, results from Phase One show a 30% decrease in deaths and serious injuries, compared to a 9% increase in deaths and serious injuries on roads where speed limits were not changed.

Further, the Speed Monitoring Economic Assessment (2024)[3] conducted on behalf of Waka Kotahi NZTA (NZTA) by WSP details the economic evaluation of posted speed limit changes on 11 state highway corridors identified by the NZTA. Nine corridors had a decrease in the posted speed limit (PSL), typically 100km/h to 80km/h, and two corridors

[2] Auckland Transport (AT) sourced at https://at.govt.nz/projects-roadworks/vision-zero-for-the-greater-good/safe-speeds-programme/safe-speed-programme-to-date

[3] New Zealand Transport Agency Waka Kotahi, Speed Monitoring Economic Assessment (2024), WSP Wellington L9 Majestic Centre 100 Willis Street Wellington 6011, New Zealand

had an increase. One site was urban while the other 10 were rural. Nine of these corridors had speed limits changed within the last five years.

In terms of key findings for changes in mean speeds, crash, and risk outcomes:

- In most cases where the posted speed limit was lowered, there was a reduction in mean speeds of between 5% and 9%.
- The actual DSI (Death and Serious Injury) change from the speed limit changes was greater than the predicted DSI change.
- For corridors where there was a reduction in posted speed limit, there was a saving of almost 27 DSIs/year (between 0.7 and 9.0 DSI/year/corridor). For corridors where there was an increase in the posted speed limit, there was an additional 1.3 DSIs/year (between 0.5 and 0.8 DSI/year/corridor).
- There are very small increases in journey time per vehicle for corridors which have a reduced posted speed limit. Overall travel time increases between 12s to 4m 04s (2.3 to 5.5 s/km time lost) for these corridors. Where posted speed limits have increased, there were travel time savings of between 24s and 1m 3s (between 1.7 and 2.8 s/km time saved).

In summary, for most of the corridors, a reduction in posted speed and mean speeds shows that the crash costs savings far outweighed the travel time disbenefits, resulting in positive BCR's. For most of the corridors with a speed limit reduction, vehicle operating costs and emissions costs made up 2% to 8% of the net benefits. For the corridors that had an increase in the posted speed limit, it is not currently clear if benefits resulting from the increases in mean speeds outweigh the increase in crash, vehicle operating, and emissions costs.

These evaluations have demonstrated outstanding life and injury saving benefits of recent speed reduction initiatives undertaken in New Zealand. To reverse these in the face of such compelling evidence would be insupportable. This proposal is strongly opposed.

Higher speed limits on certain roads

The proposal to enable 120 km/h speed limits is strongly opposed. The evidence provided clearly demonstrates that higher speeds would cause increases in deaths and serious injuries. Further, fuel use and CO2 emissions would also significantly increase and work against New Zealand's commitments to lower transport emissions.

4. Ministerial and Agency Obligations

The Land Transport Act 1998, Section 164(2) requires that the Minister, in making or recommending a rule, or the Agency in making a rule, must have regard to, and give such weight as the Minister or the Agency (as the case may be) considers appropriate in each case to a series of factors. Submission on relevant sub-sections are provided as follows:

(a) the level of risk existing to land transport safety in each proposed activity or service:

Submission: Increasing speeds is proven to substantially increase road crash death and injury and the evidence to demonstrate this has been explained.

(b) the level of risk existing to land transport safety in New Zealand in general:

Submission: New Zealand's road safety performance is currently worse than that of the world's best-performing countries. The Global Status Report 2023[4] indicates that in 2021, New Zealand had a road crash fatality rate of 7 deaths per 100,000 people. In contrast, top-performing countries like Switzerland, Sweden, and the UK had rates of only 2 deaths per 100,000 people. Australia's rate was 5 deaths per 100,000. New Zealand's road safety performance significantly lags behind other high-income countries. If implemented, the draft Rule will further worsen New Zealand's road safety performance.

(c) the need to maintain and improve land transport safety and security, including (but not limited to) personal security:

Submission: The implementation of this Rule will not maintain or improve land transport safety and will result in increasing levels of road trauma.

(e) whether the proposed rule—
(i) assists economic development:

Submission: No evidence has been provided that the proposed Rule will assist economic development. In contrast, these submissions have provided evidence and references from both an Expert Advisory Panel convened by the Swedish government and the World Bank that increasing speeds in the manner described in the draft Rule does not assist economic development.

(iii) protects and promotes public health:

Submission: Evidence has been provided to show that the proposed rule will increase road crash deaths and injuries. Not only will it fail to promote public health, but it will also lead to more serious crash casualties and negative public health effects.

(iv) ensures environmental sustainability:

Submission: Evidence has been provided that demonstrates that the proposed Rule in increasing speeds will increase CO2 emissions and will work to undermine New Zealand's commitments to reduce transport emissions.

(ea) the costs of implementing measures for which the rule is being proposed:

Submissions: Implementing these measures will incur substantial costs, including social costs from road crashes, direct costs for health, rehabilitation, and emergency services, and increased fuel expenses. Higher traffic speeds on rural roads will result in higher fuel consumption for road users and additional environmental costs due to increased vehicle emissions.

(eb) New Zealand's international obligations concerning land transport safety:

[4] Global Status Report on Road Safety (2023) World Health Organisation - https://www.who.int/publications/i/item/9789240086517

Submissions: New Zealand has clear international obligations concerning land transport safety as comprehensively explained and the draft Rule directly contradicts New Zealand's commitments.

(f) the international circumstances in respect of land transport safety:

Submissions: New Zealand, as a member of the UN has clear commitments to the goals of the UN Second Decade of Action for Road Safety as has been explained. The proposed Rule directly works in opposition to the stated commitment to halve global road crash deaths and injuries by 2030.

5. Submission Summary

Successive New Zealand governments have made commitments to implement measures that will reduce road trauma and apply the "safe system" approach. These commitments include applying speed limits that are consistent with "safe system" principles and which are evidence based. A selection of highly reputable organisational publications have been referenced that provide compelling evidence of the benefits of lowering speed limits and broad disbenefits of increasing speed limits.

The draft Land Transport Rule: Setting of Speed Limits 2024, if implemented, would directly work against the implementation of speed limits that are consistent with internationally recognised "safe system" principles.

The proposal, if implemented, would result in a major increase in lives being needlessly lost in road crashes and badly injured survivors condemned to live with lifelong disabilities.

Using crash data for the years: 2019-2021, the Ministry of Transport reported that the social costs of crashes in New Zealand for 2021 was $9.77 billion. The following average cost per crash for all roads was reported:

Average cost per crash for all roads ($)				
Component	**Fatal crash**	**Serious injury crash**	**Minor injury crash**	**Non-injury crash**
Loss of life/permanent disability	15,315,400	795,100	88,300	0
Loss of output	1,000	2,500	500	0
Medical	16,200	19,500	1,300	0
Legal and court	46,400	5,300	1,500	100
Vehicle damage	13,700	8,700	7,000	3,500
Total	15,392,800	831,100	98,500	3,600

The proposed speed limit increases would result in New Zealand substantially increasing road crash social costs. These costs would be borne by families as well as inflicting additional direct costs on health, rehabilitation, and emergency services.

The World Bank report[5] that there is clear evidence that high speeds (above 80 kph) increase both fuel consumption and CO2 emissions and that speed reduction can be a highly effective solution for cutting CO2 emissions on high-speed urban arterials as well as inter-urban roads. This proposal would additionally compromise New Zealand's commitments to the reduction of transport related emissions. Countries have agreed to reduce CO2 emissions from transport by a minimum of 50% by 2050.[6]

The implementation of the proposal would result in New Zealand failing to meet its international commitments to road safety related UN resolutions, a political declaration and the SDGs.

The draft Rule lacks a reasoned rationale and contradicts both "safe system" principles and evidence-based road safety practices.

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Chief Executive Officer

Appendix A – *'Guide for Safe Streets - Managing Traffic Speeds to Save Lives and Improve Liveability (2024)`* , World Bank – Pages 26 to 35 – sourced at Guide for Safe Speeds - Managing Traffic Speeds to Save Lives.pdf (globalroadsafetyfacility.org) attached as a separate document.

[5] Guide for safe Speeds - Managing Traffic Speeds to Save Lives and Improve Livability (2024), Global Road Safety Facility, World Bank, Page 15 – sourced at https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099032224020526401/p175107129f9b401c19e411b9abd824cfd7

[6] UNECE (United Nations Economic Commission for Europe). Climate Change and Sustainable Transport. Geneva.