Submission No 36

# INTERVENTIONS TO REDUCE ROAD TRAUMA IN REGIONAL **NSW** CAUSED BY SPEEDING, FATIGUE, DRINK AND DRUG DRIVING

**Organisation:** Bus NSW

Date Received: 25 July 2025



# Inquiry into Interventions to Reduce Road Trauma in Regional NSW Caused by Speeding, Fatigue, Drink and Drug Driving

# BusNSW Submission to the Joint Standing Committee on Road Safety - 25 July 2025

## Introduction

BusNSW is the peak body for the NSW private bus and coach industry. Our members provide essential services and provide a key interface with the travelling public. BusNSW's mission is to foster the efficient and sustainable growth of public transport in NSW and so promote the benefits of bus travel.

Buses play a vital role in delivering public transport in NSW and carry more than 300 million passengers per year, including almost 580,000 students travelling to and from school each day. BusNSW members provide bus services under Transport for NSW contracts in Sydney metropolitan and outer-metropolitan areas, and in NSW rural and regional areas. They also provide "non-contracted" services in the long distance, tourist and charter sector throughout NSW and Australia.

BusNSW supports the principles of Towards Zero, an integrated 'safe system' approach that promotes the concurrent implementation of initiatives to improve road safety through safer roads, safer speeds, safer vehicles, and safer people. BusNSW collaborates with *Transport for NSW* (TfNSW) and the *Centre for Road Safety* to develop and disseminate information to bus and coach operators, with the shared goal of reducing deaths and serious injuries on NSW roads.

BusNSW actively promotes the annual "Bus Safety Week" and "Be Bus Aware" campaigns, encouraging its members to share key safety messages with drivers, passengers, and the wider community. The association also supports the "Slow Down to 40 when Lights Flash" campaign, which raises awareness of local road safety around school zones. At the national level, BusNSW supports National Road Safety Week, an initiative of the Safer Australian Roads and Highways (SARAH) Group, aimed at reducing road trauma and fostering a culture of safety on Australian roads.

BusNSW welcomes the opportunity to contribute to this inquiry and outlines its submission in response to the Terms of Reference.

# a) Research and data on regional NSW-specific factors, characteristics and demographics of road crashes

Regional NSW accounts for a disproportionate number of serious and fatal road crashes, often due to high-speed environments, long travel distances, and reduced infrastructure quality. While heavy vehicles such as buses are highly regulated, much of the trauma is caused by other road users engaging in risky behaviour.

BusNSW highlights the need for better access to and sharing of granular crash data across agencies and stakeholders, particularly at the local government level. This data could help identify high-risk locations, behaviours (e.g. speeding past stationary school buses), and demographic groups for targeted interventions.

Additionally, bus and coach operators record safety incidents with TfNSW through the *Bus Incident Management Database*. Operators are also required to report certain significant safety occurrences immediately to the *Office of Transport Safety Investigations* (OTSI) Duty Officer via the 24-hour hotline. To enhance safety outcomes, it is important that insights and lessons from this data are made accessible to local councils and enforcement agencies. Improving the transparency and availability of incident data can support more informed planning and targeted responses in high-risk regional areas.

# b) Effectiveness of current strategies and programs to reduce speeding, fatigue, drink and drug driving in regional NSW

### 1. Speeding and School Bus Safety

BusNSW remains concerned about motorist behaviour around stationary school buses, particularly in rural and regional areas where vehicles often pass at or near highway speeds. Despite the presence of flashing "wig wag" lights and road rules requiring motorists to slow to 40km/h, compliance remains low and enforcement limited. Between 2015 and 2020, 74 crashes occurred involving child pedestrians and buses, many in regional areas and often after the child had alighted.

Current strategies such as *Bus Safety Week* and awareness campaigns have been valuable but must be supported by ongoing targeted enforcement and public education to change motorist culture. This represents a clear gap in current road safety efforts.

#### 2. Fatigue Management

Fatigue is a leading contributor to road trauma in NSW and is particularly prevalent on regional roads. In 2024 alone, 69 of the 78 fatigue-related fatalities occurred in regional communities, demonstrating the urgent need for targeted fatigue management strategies outside metropolitan areas.

Accredited bus operators in NSW are subject to the fatigue management provisions of the *Heavy Vehicle National Law* (HVNL), which are designed to prevent drivers of fatigue-regulated heavy vehicles from operating while impaired by fatigue. In addition, bus and coach operators must implement comprehensive *Safety Management Systems* (SMS) in accordance with NSW passenger transport legislation. These systems include requirements for fatigue record-keeping, driver fitness assessments, and vehicle monitoring. Driver shifts and rosters must be scheduled in compliance with fatigue management regulations to ensure adequate rest periods and minimise safety risks.

Given that regional and country roads are a primary workplace for NSW transport workers, including bus drivers, there is a clear need to strengthen and expand fatigue-reduction measures for all road users in these areas. The NSW Government has made progress through initiatives such as:

- Investing \$1 billion in lifesaving infrastructure upgrades under the Towards Zero and Road Safety Program;
- Installing 2,700 kilometres of rumble strips to alert fatigued drivers;
- Maintaining and upgrading rest areas, including through the \$11.9 million *Heavy Vehicle* Rest Stop Minor Works program;
- Supporting Driver Reviver sites to provide free refreshments and rest opportunities;
- Promoting the "Don't Trust Your Tired Self" campaign to raise awareness about early warning signs of fatigue.

BusNSW supports these initiatives and recommends ongoing investment in well-equipped, accessible rest stops, particularly along long-distance and remote bus routes. Consideration should also be given to mobile rest facilities or designated layover zones for bus and coach drivers operating in areas with limited roadside infrastructure. Addressing fatigue through both regulatory measures and targeted infrastructure improvements will help reduce the risk of serious incidents on regional roads.

# 3. Drink and Drug Driving

Bus operators in NSW are required to ensure that bus safety employees are not under the influence of drugs or alcohol while on duty. To meet this obligation, operators must implement a *Drug and Alcohol Program* tailored to their bus safety workforce.

BusNSW has long advocated for an amendment to the *Passenger Transport (General) Regulation 2017* to allow test supervisors to request oral fluid (saliva) samples from transport safety workers for drug testing, rather than relying solely on urine samples. The current regulatory requirement acts as a disincentive for operators to conduct drug testing, particularly in regional areas where access to urine testing facilities is limited. Allowing oral fluid testing would enhance the practicality and effectiveness of drug testing across the bus industry.

# c) Proposed Measures to Reduce Road Trauma

BusNSW proposes the following measures:

# 1. Increased Enforcement of "40km/h When Lights Flash" Rule

- a. Targeted campaigns in regional areas.
- b. Greater police presence on school bus routes.
- c. Technology-based enforcement (e.g. vehicle cameras or mobile detection units).

## 2. Local Government Road Safety Planning

- a. Require formal consultation with local bus operators during road planning.
- b. Audit all informal and formal bus stops in regional NSW to assess safety risks and upgrade needs (shelters, lighting, indented stops, signage).

#### 3. Infrastructure Investment

- a. Improve road surfaces and markings on regional bus routes.
- b. Invest in safer bus stops and school interchange zones.
- c. Improve delineation of bus-only areas and "kiss and ride" zones near schools.

### 4. Modernising the Bus Fleet

- a. Reduce the maximum bus age for contracted services from 26 to 18 years to ensure modern safety features.
- b. Fast-track incentives for *Autonomous Emergency Braking* (AEB) for certain buses and coaches, and telematics systems.
- c. Develop safety standards and community education for electric buses to address emerging hazards such as quieter vehicles in rural settings.

#### 5. Improved Fatigue Facilities

- a. Expand investment in rest stops in rural and remote regions.
- b. Consider mobile rest facilities for remote or long-distance coach routes.

#### 6. National and Local Public Education Campaigns

a. Coordinate campaigns with localised, culturally relevant messages for regional NSW. Include topics such as child pedestrian safety and overtaking school buses.

# d) Implementation of relevant recommendations from the 2023 Performance Audit Report of the Auditor-General, entitled 'Regional Road Safety', dated 30 November 2023

The 2023 Performance Audit recommended better coordination, accountability, and local ownership of road safety initiatives. BusNSW supports these goals, particularly:

- Involving local councils more meaningfully in safety planning and funding.
- Embedding consultation with key public transport stakeholders (including bus operators) in all stages of infrastructure projects.
- Using performance-based metrics, including reductions in school-related incidents, to measure success.

#### e) Any other related matters

#### 1. Roadside Bus Breakdowns

One of the most common and serious safety hazards in the bus and coach industry is the onroad risk presented by vehicle breakdowns, particularly in regional areas. While breakdowns can occur in all motor vehicles, buses carry public passengers, often including schoolchildren, which significantly heightens the potential consequences of an incident.

Data from across the industry shows that the majority of serious injuries and fatalities during breakdown incidents occur outside the bus, typically when passengers are alighting or moving around the vehicle on the roadside. The presence of children in these situations adds to the risk, particularly on high-speed regional roads where visibility, road geometry, or weather conditions (e.g. fog, wet surfaces) can exacerbate danger.

In regional NSW, these risks are compounded by:

- Narrow single-lane roads with minimal shoulders or stopping space
- Higher traffic speeds and heavy vehicle volumes
- Poorer road infrastructure, including inadequate signage and road surfaces
- Limited access to emergency or mechanical support services in remote locations

There is also the real risk of secondary collisions, where a moving vehicle strikes a stationary bus or a roadside repair vehicle. On high-speed roads, these impacts can be catastrophic and result in multiple casualties.

In response to these issues, BusNSW, through funding from the National Heavy Vehicle Regulator's *Heavy Vehicle Safety Initiative* (HVSI), developed a Bus Breakdown Guide. The Guide outlines industry best practice for managing roadside breakdowns, with a focus on minimising risk to drivers, passengers, maintenance staff, and emergency responders.

While this resource is a significant step forward, BusNSW believes that further action is required beyond the industry level, including:

- Broader public awareness campaigns to educate motorists on how to safely pass a broken-down bus, especially in rural and high-speed zones
- Enhanced roadside infrastructure, such as dedicated pull-over bays and clearer hazard signage along known bus routes
- Improved communication protocols between operators, emergency services, and TfNSW to ensure rapid and coordinated responses
- Formal integration of bus breakdown risks into local road safety planning, especially in areas with high student transport volume

#### 2. Seatbelts on Buses and Coaches

The use of seatbelts on buses and coaches is a critical safety measure, particularly in regional and rural areas of NSW where there are higher travel speeds and long-distance routes.

In 2024, regional bus passengers were reminded to "Buckle up on the bus" through a Transport for NSW advertising campaign delivered across television, radio, digital platforms, social media, and regional print newspapers. As part of the first phase of the campaign, operators installed posters, stickers, and decals on more than 2,500 buses throughout regional NSW.

The rollout of this seatbelt campaign followed recommendations from the NSW Bus Industry Taskforce, established in 2023 to identify ways to improve bus services and enhance passenger safety. In addition, recent amendments to *Australian Design Rule (ADR) 68* will introduce mandatory visual and audible seatbelt warnings to further reinforce passenger compliance.

BusNSW urges the NSW Government to commit funding for ongoing public education campaigns that promote seatbelt use on buses and coaches, particularly in high-risk regional areas. Consistent messaging is essential to driving behavioural change and improving passenger safety outcomes.

#### 3. Zero Emission Bus Transition

The NSW Government's transition to a zero-emissions bus fleet is underway, with regional NSW scheduled to complete the shift by 2047. While this supports environmental and operational objectives, it also introduces new safety challenges for road users, pedestrians, mechanics, and emergency services personnel.

Zero Emission Buses (ZEBs), including battery electric and hydrogen fuel cell vehicles, differ from traditional diesel buses in key ways. Their quieter operation increases risks in low-speed, pedestrian-heavy areas, particularly near schools, where they may not be heard.

Additionally, limited experience in managing high-voltage systems presents challenges for first responders and maintenance staff. To assist address these risks, the NSW Government introduced mandatory safety labels for electric, hybrid, and hydrogen vehicles in 2019 to assist emergency services in crash scenarios.

BusNSW seeks NSW Government support for the continued development of targeted training programs for drivers, depot staff, and mechanics to ensure the safe and effective operation of zero emission buses. These programs should be developed in collaboration with the bus industry, vehicle manufacturers, and emergency service agencies, and reflect the practical operating conditions across both urban and regional NSW.

#### Conclusion

Reducing road trauma in regional NSW requires a coordinated, multifaceted approach that responds to the unique and complex challenges faced by road users, transport workers, and local communities. As outlined in this submission, buses and coaches provide an essential service, connecting regional and rural populations and facilitating the safe daily transport of thousands of school children. However, these services are exposed to elevated risks from factors such as speeding, fatigue, drug and alcohol use, and infrastructure deficiencies.

BusNSW supports the NSW Government's Towards Zero vision and is committed to working collaboratively with government agencies, local councils, and other stakeholders to implement evidence-based safety measures. This includes enhanced enforcement, smarter infrastructure investment, improved fatigue facilities, ongoing public education campaigns, and regulatory reforms that reflect the realities of operating in regional areas. By embedding the needs of bus and coach services into broader road safety strategies, the NSW Government can not only reduce fatalities and serious injuries but also strengthen the safety, resilience, and sustainability of public transport across the state.

BusNSW thanks the Committee for the opportunity to contribute to this important inquiry and would welcome the chance to provide further input as required.