



10 November 2025

Consultation Team

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

Via online upload

Dear Consultation Team,

Consultation Regulatory Impact Assessment – Reducing the default speed limit outside of built-up areas

Thank you for the opportunity to contribute to this consultation process. The Australian Livestock & Rural Transporters Association (ALRTA) represents small and medium transport businesses serving rural and regional Australia. Our members move livestock and essential goods daily on unsigned open roads (roads without posted speed signs) that keep small communities functioning.

Our position

ALRTA does not support reducing the sealed-road default from 100 km/h and does not support introducing a new national default for unsealed roads. Where safety risks exist, they should be addressed where they occur through posted, risk-based limits and low-cost engineering improvements (shoulders, delineation, overtaking opportunities).

Why blanket default changes on unsigned roads are the wrong tool

- **Fatigue & risk displacement:** Extra runtime pushes more heavy-vehicle driving into dusk/night and can require additional Heavy Vehicle National Law (HVNL)/Electronic Work Diary (EWD) breaks—conditions associated with higher risk.
- **Animal welfare & time-sensitive freight:** Longer journeys increase time-off-water and heat-load pressures for livestock, and reduce delivery reliability for fuel and medicines in small communities.
- **Productivity without safety gain:** Uniform default reductions penalise compliant operators on safe links and divert resources from targeted fixes that actually reduce crash risk.

Our Response to the RIA Modelling

We acknowledge the RIA's aggregate modelling. However, for default, unsigned rural freight links, it over-generalises heterogeneous risk and understates operational fatigue, animal welfare and service reliability impacts.

Our attached submission answers the paper's Questions for Stakeholders point-by-point and provides worked examples from typical livestock and rural-service legs to demonstrate these impacts.

Recommendations

1. Do not proceed with reductions to the sealed-road default; do not introduce a national unsealed-road default.
2. Manage risk with posted, risk-based limits and low-cost engineering on identified links.
3. If Ministers nonetheless proceed:
 - Exclude designated pastoral/freight corridors pending local risk review.
 - Require clear signage and an education-first rollout.
 - Conduct a 24-month review against rural-relevant metrics (dusk/night crash share, EWD rest-break incidence, livestock condition/heat-load outcomes, and rural service reliability).

ALRTA's detailed responses and evidence are enclosed. We can supply additional operational data from members on request. Please contact our General Manager, Policy and Strategy, Mr Ashley Mackinnon, via ashley@alrta.org.au or 0407 766 153 to discuss further.

Yours Sincerely,



Gerard Johnson
President,
Australian Livestock and Rural Transporters Association

Executive summary

The Australian Livestock and Rural Transporters Association (ALRTA) does not support reducing the sealed-road default from 100 km/h and does not support introducing a new national default for unsealed roads. Blanket default reductions are the wrong tool. On the roads our members use, uniform lower limits lengthen journeys, push more heavy-vehicle driving into dusk and night, and can require an additional break under Heavy Vehicle National Law (HVNL) Standard Hours. An Electronic Work Diary (EWD) is a National Heavy Vehicle Regulator (NHVR)-approved digital log that records work and rest and provides real-time prompts against the 5½-, 8- and 11-hour Standard Hours windows; unlike a paper Written Work Diary (WWD), an EWD also timestamps short breaks within those windows. These changes elevate fatigue risk without commensurate safety gain. Longer runtimes also increase time-off-water and heat-load pressures for livestock and undermine time-sensitive welfare support and receival times at saleyards and processors in small communities. The proposals impose material operational harms and costs while diverting attention and resources from targeted treatments that actually reduce crash risk on identified links.

We have reviewed the consultation's modelling and reject its applicability to default, unsigned rural freight networks. The analysis over-generalises heterogeneous risk and understates real-world costs in rural operations—especially fatigue displacement from added runtime and break triggers, animal welfare impacts from extended journeys, and reliability effects for essential services. This submission provides representative routes, methods and auditable calculations showing how added minutes per 100 km translate into missed booking and receival windows, additional rest-break incidence and increased dusk/night exposure.

Our preferred approach is to retain current defaults and manage risk locally through posted, risk-based limits and low-cost engineering on identified links (shoulder works, delineation, overtaking opportunities). This targets harm where it occurs, preserves productivity on safe links and delivers measurable safety outcomes. If Ministers proceed contrary to our recommendation, the policy must, at a minimum, exclude designated pastoral and freight corridors pending local risk review, include clear signage with an education-first rollout, and commit to a 24-month review against rural-relevant metrics—dusk/night crash share, EWD-logged rest-break incidence, livestock condition/heat-load outcomes, and rural service reliability.

The sections that follow answer the consultation's stakeholder questions point-by-point, set out methods and assumptions, and present worked route examples and calculations (Annex A) that evidence the impacts described above.

Statement of the Problem

We write from the reality of rural freight and livestock operations: risk is local to specific links and behaviours. Blanket default reductions shift exposure into higher-risk periods and strain animal welfare and rural service reliability; targeted, link-specific fixes are the right tool.

Does the RIA adequately identify and define the problem?

Verdict: No. The risk is localised on specific links/behaviours, not system-wide “default speeds.”

Evidence: Severe outcomes are disproportionately regional/remote, which signals heterogeneous, context-specific risk rather than a uniform problem class.¹ Targeted speed management and low-cost engineering on identified links are the established practice for addressing link-specific harm.²

Recommendation: Define the problem as local risk on identified links and address it via posted, risk-based limits plus simple engineering.

Are there any other problems not considered by this RIA?

Verdict: Yes. Three material omissions for rural freight/livestock.

Evidence:

- (i) Longer runtimes can require extra Standard Hours rest and push more driving into dusk/night, elevating fatigue risk.³
- (ii) Livestock face time-off-water and heat-load pressures against national limits.⁴
- (iii) Tight animal welfare support and receival times at saleyards/processors mean small delays can become missed receival windows.

Recommendation: Treat these as explicit constraints and evaluation metrics in any policy design.

Does the RIA establish a case for amending the default speed limits in the ARR?

Verdict: Not for default, unsigned rural freight networks.

Evidence: Applying aggregate speed–trauma elasticities to heterogeneous default roads over-generalises risk. Added minutes per 100 km can require an additional break and more

¹ Department of Infrastructure, Transport, Regional Development, Communications and the Arts 2025. *National Road Safety Data Hub — Annual trauma*. Commonwealth of Australia, Canberra.

² Queensland Department of Transport and Main Roads 2025. *Queensland Road Safety Technical User Volumes: Guide to Speed Management*. Brisbane

³ Heavy Vehicle (Fatigue Management) National Regulation 2012, *Schedule 1—Standard Hours*, Queensland Government, Brisbane, Sch 1, Table 1 (solo drivers).

⁴ Animal Health Australia 2012, *Australian Animal Welfare Standards & Guidelines—Land Transport of Livestock*, Canberra, Std 5.1; Appendix Table A1.

dusk/night exposure under Standard Hours.⁵ For livestock, longer trips erode welfare margins set by national standards.⁶ Regional/remote areas already bear ~two-thirds of road deaths, so displacing hours into higher-risk periods can backfire.⁷

Recommendation: Retain current defaults and manage risk locally; if Ministers proceed, apply corridor exclusions, clear signage and education-first rollout, and a 24-month review using rural-relevant metrics.

Objectives and Options

We assess options against rural operations and Safe System principles. Risk is local to specific links; blanket defaults displace exposure into dusk/night and tighten welfare margins. Our evidence draws on HVNL Standard Hours and NHVR EWD guidance, the national livestock standards, and jurisdictional speed-management practice.

Does the RIA present clear, well-differentiated options that can achieve the stated policy objective?

Verdict: Partly. Speed-reduction options are mechanically distinct but policy-narrow.

Evidence: The set omits the primary targeted alternative widely used by jurisdictions: posted, risk-based limits and low-cost engineering on identified links.⁸

Recommendation: Add “Targeted Posted Limits and Engineering on Identified Links” as a formal option with explicit rural implementation and evaluation design.

Which of the options analysed have the ability to meet the stated objectives? How could these be enhanced?

Verdict: In practice, Targeted posted, risk-based limits and low-cost engineering best meet the objective where risk actually occurs.

Evidence: Jurisdictional guidance adopts Austroads principles for link-specific speed management and treatments (shoulders, delineation, overtaking opportunities, hazard mitigation), which deliver safety gains without broad productivity/welfare penalties on safe links.⁹ If any blanket default reduction is nonetheless pursued, scope should be limited with pastoral/freight corridor exclusions, clear signage, education-first rollout, and a 24-month evaluation on rural-relevant metrics.

Recommendation: Prefer the targeted program; if a default reduction proceeds, adopt the rural safeguards above and commit to reversal/refinement if net harms are evidenced.

⁵ Heavy Vehicle (Fatigue Management) National Regulation 2012, *Schedule 1—Standard Hours*, Queensland Government, Brisbane, Sch 1, Table 1 (solo drivers).

⁶ Animal Health Australia 2012, *Australian Animal Welfare Standards & Guidelines—Land Transport of Livestock*, Canberra, SA5.1; Part B species tables (e.g., cattle SB4.1; sheep SB11.1).

⁷ Department of Infrastructure, Transport, Regional Development, Communications and the Arts 2025, *National Road Safety Data Hub — Annual trauma*, Commonwealth of Australia, Canberra.

⁸ Queensland Department of Transport and Main Roads 2025, *Queensland Road Safety Technical User Volumes: Guide to Speed Management*, Brisbane, p. 2; §6.1.

⁹ Department of Transport (Vic) 2021, *Speed Zoning Technical Guidelines (Edition 2)*, Melbourne, pp. 3–4; §1.1.

Are there any other feasible options that should be considered?

Verdict: Yes—targeted, link-specific safety programs.

Evidence: Jurisdictional practice (Austroads-aligned) prioritises posted, risk-based limits with low-cost engineering (sealed shoulders, delineation/linemarking, overtaking opportunities, rumble treatments, wildlife mitigation) on identified links, rather than blanket defaults.¹⁰

Recommendation: Add a formal option: Targeted Posted Limits and Engineering on Identified Links, implemented through local audits and treatment programs consistent with Austroads guidance.

Of the options discussed, which is most effective and why?

Verdict: Targeted posted, risk-based limits with engineering is the most effective and proportionate.

Evidence: Speed-management guidelines used by states apply link-specific assessments and treatments to match risk to context—delivering safety benefits where risk actually occurs while avoiding network-wide productivity and welfare penalties.¹¹

Recommendation: Prefer the targeted program as the primary policy pathway; use blanket defaults only as a last resort where local assessment fails to address demonstrated risk.

Which is your preferred option and why?

Verdict: Retain current defaults and deploy a targeted posted-limit and engineering program on identified links.

Evidence: This approach aligns with the Safe System/Movement and Place principles—set safe and appropriate speeds tied to context, ensure compliance, and deliver treatments that reduce actual harm.¹² It avoids displacing heavy-vehicle hours into higher-risk periods or eroding animal welfare margins.

Recommendation: Adopt the targeted program nationally, with transparent local assessments and publication of before/after safety results. To illustrate impacts on unsigned rural links, we include two brief case studies: (1) Western Queensland livestock corridors (Roma–Tambo via local unsigned connectors), and (2) Northern Victoria wheatbelt harvest runs (Birchip–Charlton/Dooen) via local unsigned sealed/unsealed roads. Using the submission’s method (~6 minutes per 100 km when effective pace reduces by ~8.3%), the added drive time on these legs reduces Standard Hours buffers, can require an additional break, and re-times egress into dusk/night. See Annex A (Table A1) for the calculations.

Are the objectives as expressed appropriate?

¹⁰ Queensland Department of Transport and Main Roads 2025, *Queensland Road Safety Technical User Volumes: Guide to Speed Management*, Brisbane, §3.5; §6.1.

¹¹ Department of Transport (Vic) 2021, *Speed Zoning Technical Guidelines (Edition 2)*, Melbourne, p. 4 §1.1.

¹² Office of Road Safety 2021, *National Road Safety Strategy 2021–30*, Commonwealth of Australia, Canberra, p. 10; p. 25.

Verdict: Partly. Add objectives for unintended-harm minimisation and rural equity/service reliability.

Evidence: National strategy emphasises tailoring interventions to context within the Safe System, with a strong focus on regional roads and preventing harm while supporting essential movement/place functions.¹³ Current objectives should explicitly require that interventions do not increase dusk/night exposure or breach welfare/service constraints.

Recommendation: Amend objectives to include:

- (iv) No net increase in dusk/night heavy-vehicle exposure.
- (v) No degradation of animal welfare compliance margins.
- (vi) No reduction in rural service reliability—tested via published metrics.

Methodology

We build on the consultation’s method with rural-operations evidence. We show where exposure and costs differ for unsigned rural links (Standard Hours/EWD timing, livestock welfare margins, rural service logistics) and propose alternative assumptions and datasets to test impacts more precisely.

Are the lists of costs and benefits considered in this methodology sufficient to capture the costs and benefits of the proposed change?

Verdict: No. Key rural costs are missing or under-weighted.

Evidence: Longer runtimes can require additional Standard Hours rest and can shift driving into dusk/night.¹⁴ Livestock movements face time-off-water and heat-load limits that longer trips push against.¹⁵ Implementation also carries real costs (signage upgrades and associated systems updates) recognised in state speed-management practice when limits change.¹⁶ For example, on a representative Western Queensland livestock corridor (Roma–Tambo) and a Northern Victoria harvest round trip (e.g., Birchip–Charlton), applying the same method (~6 minutes per 100 km) extends drive time, can require an additional break under Standard Hours, and push finish into dusk/night. See Annex A (Table A1) for the route calculations.

Recommendation: Expand the impact accounting to include:

- (i) Fatigue/duty-cycle costs (break incidence; dusk/night share).
- (ii) Animal welfare compliance risk (TOF/heat-load margins).

¹³ Office of Road Safety 2021, *National Road Safety Strategy 2021–30*, Commonwealth of Australia, Canberra, pp. 10, 16.

¹⁴ Heavy Vehicle (Fatigue Management) National Regulation 2012, *Schedule 1—Standard Hours*, Queensland Government, Brisbane, Sch 1, Table 1 (solo drivers).

¹⁵ Animal Health Australia 2012, *Australian Animal Welfare Standards & Guidelines—Land Transport of Livestock*, Canberra, SA5.1; SB4.1; SB11.1.

¹⁶ Queensland Department of Transport and Main Roads 2025, *Queensland Road Safety Technical User Volumes: Guide to Speed Management*, Brisbane, §11; §13.

- (iii) Rural service reliability (missed windows/curfews; contingency runs).
- (iv) Implementation/admin costs (signage and systems updates). Use these as evaluation metrics in any trial/rollout.

Do the scenarios considered capture the full range of uncertainty about the costs and benefits of the policy?

Verdict: No—key rural uncertainties aren’t modelled.

Evidence: Runtime increases can require an additional break under Standard Hours and shift exposure into dusk/night, changing crash and compliance risk in ways not captured by average elasticities.¹⁷ Regional/remote trauma is already disproportionate—policy that re-times heavy-vehicle exposure needs explicit sensitivity testing for rural networks.¹⁸

Recommendation: Add scenarios that vary time-of-day exposure, break incidence under Standard Hours, seasonality/weather disruptions, and task/fleet mix for unsigned rural links.

Are there any additional data that ought to have been considered when constructing the baseline FSI, VKT, efficiency and fuel costs?

Verdict: Yes—several operational datasets are missing.

Evidence:

- (i) Anonymised Electronic Work Diary (EWD)/Written Work Diary (WWD) extracts showing duty time and break-trigger points by corridor/time of day.¹⁹
- (ii) Livestock welfare margins (time-off-water/heat-load) by species to bound feasible journey times.²⁰
- (iii) Regional exposure profiles from the National Road Safety Data Hub to weight unsigned networks appropriately.

Recommendation: Build the baseline with route-level EWD timing, species welfare constraints, and regional/remote exposure weights, then test policy impacts against those bounds.

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?

Verdict: Partly—aggregate speed–trauma elasticities need rural corrections.

Evidence: Applying a single elasticity to heterogeneous default roads mis-specifies risk; state practice sets speeds by local context and pairs posted, risk-based limits with low-cost

¹⁷ Heavy Vehicle (Fatigue Management) National Regulation 2012, *Schedule 1—Standard Hours*, Queensland Government, Brisbane, Sch 1, Table 1 (solo drivers).

¹⁸ Department of Infrastructure, Transport, Regional Development, Communications and the Arts 2025, *National Road Safety Data Hub — Annual trauma*, Commonwealth of Australia, Canberra.

¹⁹ National Heavy Vehicle Regulator 2025, *Electronic Work Diary (EWD) — Driver guidance*, NHVR, Brisbane.

²⁰ Animal Health Australia 2012, *Australian Animal Welfare Standards & Guidelines—Land Transport of Livestock*, Canberra, SA5.1; SB4.1; SB11.1.

engineering.²¹ Fatigue impacts should reflect the thresholds in the Standard Hours tables rather than generic average travel-time factors.²²

Recommendation: Use separate exposure–risk functions for heavy vehicles by time of day and task; cap benefits by achievable compliance on unsigned roads; and attribute benefits to link-specific treatments where posted limits are paired with engineering.

Other Impacts

Other impacts are disproportionate for small regional carriers: added runtime drives extra fatigue breaks and compliance/admin load, while signage and system changes add cash costs. Our answers below detail these burdens and the safeguards needed to protect rural competition.

Are there any additional regulatory burdens that have not been considered?

Verdict: Yes—implementation and administrative burdens are under-counted.

Evidence: Speed-zone changes require signage upgrades, digital mapping/telematics updates, and monitoring under state policies. Scheduling and rostering (as set out in the Heavy Vehicle (Fatigue Management) National Regulation, Schedule 1) must be re-worked to meet Standard Hours and EWD compliance if runtimes increase; that planning effort and ongoing audit load are recurring costs, not one-offs.

Recommendation: Include one-off and ongoing costs for signage/systems, driver scheduling and compliance admin, and customer window renegotiation, using agency guidance (Manual of Uniform Traffic Control Devices Part 4 — Speed Controls) to scope items and timing. Where trials occur, publish the cost profile alongside safety outcomes.

Are there any additional impacts on competition that have not been considered?

Verdict: Yes—network-wide slowdowns disproportionately disadvantage small regional carriers.

Evidence: Added runtime and extra breaks reduce asset utilisation and raise duty-time compliance overheads; operators with fewer depots and relief crews face higher per-trip costs and missed windows, eroding contestability for remote contracts. Cross-border inconsistencies in combination-specific heavy-vehicle speed limits (e.g., road trains vs PBS combinations) already create planning and compliance risk; widening differentials alongside a blanket default change would further erode contestability for small regional carriers.

Recommendation: Assess distributional impacts by operator size and remoteness. Where harm concentrates on small regional carriers, adopt corridor exclusions, provide implementation support (education, phasing, signage funding), and hard-test the package against rural-relevant metrics (dusk/night crash share; EWD break incidence; rural service

²¹ Queensland Department of Transport and Main Roads 2025, *Queensland Road Safety Technical User Volumes: Guide to Speed Management*, Brisbane, §3.5; §6.1.

²² Heavy Vehicle (Fatigue Management) National Regulation 2012, *Schedule 1—Standard Hours*, Queensland Government, Brisbane, Sch 1, Table 1 (solo drivers).

reliability). In parallel, progress a national harmonisation of combination-specific heavy-vehicle speed limits (via HVNL/notices and with non-HVNL jurisdictions) to reduce overtaking pressure, simplify cross-border compliance, and avoid disadvantaging safer, accredited combinations.

Conclusion

ALRTA's position is unequivocal: do not reduce the current default open-road limits. The right pathway is targeted, evidence-based risk management—fix the specific links and behaviours that drive harm, rather than imposing blanket reductions on unsigned rural networks.

Evidence-based, risk-based in practice: screen for high-risk links (crash/exposure, geometry/surface, operating speeds, task/time-of-day), set posted, risk-based limits only where warranted, pair with low-cost engineering (shoulders, delineation/linemarking, overtaking opportunities, audio-tactile rumble strips, wildlife mitigation), sign clearly, and evaluate with before/after metrics (dusk/night crash share, EWD rest-break incidence, livestock condition/heat-load, rural service reliability) with a refine/rollback trigger.

If Government proceeds contrary to our recommendation, the policy must at a minimum include:

- Corridor exclusions for pastoral/freight routes pending local risk review.
- Clear signage with an education-first rollout.
- A 24-month review against the rural metrics above, with an explicit reverse/refine trigger if harms emerge.

These safeguards do not weaken our opposition to blanket default reductions; they limit avoidable damage if a contrary decision is made.

ALRTA stands ready to walk officials through the annexed route examples and calculations, and to assist with a practical template for link screening, treatment selection, and transparent before/after evaluation.

References

Animal Health Australia 2012, *Australian Animal Welfare Standards & Guidelines—Land Transport of Livestock*, Canberra. Available at: <https://animalwelfarestandards.net.au/wp-content/uploads/2023/08/Land-transport-of-livestock-Standards-and-Guidelines-Version-1.-1-21-September-2012.pdf> (accessed 21 Oct 2025).

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Queensland Department of Transport and Main Roads 2025, *Queensland Road Safety Technical User Volumes: Guide to Speed Management*, Brisbane. Available at: <https://www.tmr.qld.gov.au/-/media/busind/techstdpubs/Road-Safety/QRSTUV/Guide-to-Speed-Management/QRSTUV-Guide-to-Speed-Management.pdf> (accessed 21 Oct 2025).

Annex A

Method

We model a representative operational planning average of 84 km/h on unsigned open-road links (roads without posted speed signs in 100 km/h default areas) and a reduced effective average of 77 km/h ($\approx 8.3\%$ slower). For each route we report baseline driving time, reduced pace driving time, and added minutes. Times are driving time only (exclude loading/unloading and statutory rest). The added-time rate at 84 km/h to 77 km/h is ≈ 6.5 minutes per 100 km (computed as $100 \times (1/77 - 1/84) \times 60$). Whether the longer runtime requires an additional break depends on the full 24-hour plan under HVNL Standard Hours.

Table 1

Route	Distance (km)	Trip	Baseline avg (km/h)	Baseline drive time	Reduced avg (km/h)	New drive time	Added time (min)
Roma–Tambo (QLD) — livestock corridor incl. unsigned local connectors	386	one-way	84	4h 36m	77	5h 01m	25
Birchip–Charlton (VIC) — harvest run via local sealed roads	64	one-way	84	0h 46m	77	0h 50m	4
Birchip–Charlton (VIC) — harvest round trip	128	round trip	84	1h 31m	77	1h 40m	8
Birchip–Dooen (VIC) — harvest run to rail/terminal	113	one-way	84	1h 21m	77	1h 28m	7
Birchip–Dooen (VIC) — harvest round trip	226	round trip	84	2h 41m	77	2h 56m	15

