

Dear Senator Leyonhjelm and others,

I wrote to you on 27th November alerting you to the likely line of response to expect from the Australasian College of Road Safety and others (submission 257) in response to questions on notice. This has now come to pass, as I expected.

Referring to their response, I would like to flag the following issues:

In response to the question as to the rate of cyclists' head injuries in Australia compared to the OECD average, they were unable to give an answer, as they openly acknowledge they do not have the relevant exposure data. They did however offer the comparison, showing that the death rate per 100,000 population from cycling is 5.5 times greater in the Netherlands than in Australia. This result is both meaningless and highly misleading without an inclusion of the base line showing how much cycling is actually done in these two countries. It is widely acknowledged that cycling is much much more widespread in the Netherlands than in Australia. I too am hampered by lack of hard data for a numerical comparison for adult cycling. I can however offer you the findings of Dr Jan Garrard, who's 2009 study "Active Transport: Children and Young People - An overview of recent evidence" found (p.7) that Dutch children cycled on average 84 times the distance cycled by children in Melbourne, on an annual basis. I will leave you to draw your own conclusion from that.

The response to the question seeking clarification of the cost comparison of a non-helmeted cycling head injury versus a helmeted head injury simply avoided the question, merely supplying conjectural comparisons from unpublished work. I understand this matter has been more objectively covered by Dr. Robinson in her response.

It is also disappointing that the combined group chose once more to criticise those who disagree with them - largely it seems on the basis that they are "individuals" rather than representatives of institutions. The response to questions on notice is not the appropriate forum for such last minute spruiking of an entrenched position.

I would also like to highlight a shortcoming in the VicRoads response. VicRoads were asked if there was data showing a decline in head injury rates following the introduction of steeper fines in 2009. Their response was that the connection was problematic. They did however supply head injury hospitalisation numbers obtained from the Victorian Injury Surveillance Unit. Unfortunately, they chose to start the sequence with numbers for 2009/10, *after* the introduction of the higher fines. This renders the data meaningless.

Thank you again for your consideration of this important matter.

Kind regards

Alan Todd  
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