



**AUSTRALIAN  
AUTOMOBILE  
ASSOCIATION**

**Constituent Members**



The Secretary  
Senate Rural and Regional Affairs and Transport Legislation Committee  
PO Box 6100  
Parliament House  
Canberra  
ACT 2600

Dear Sir/Madam

**Nation Building Program (National Land Transport) Amendment Bill  
2009**

We write in relation to the above Bill.

Australian Automobile Association (AAA) represents the interests of over six million motorists through its State and Territory motoring Clubs and associations.

The amendments to the Bill are therefore of interest to AAA, although we note that the main changes appear to relate to replacing references to AusLink with 'Nation Building Program'. Obviously, this is not a concern for us.

Our major concerns relate to the level of funding for the Program, the roads that should be included in the National Network, the criteria used to fund individual projects, the time frames to complete projects, the funding agreements between the Commonwealth and the States and the relative contributions that are made. Cost overruns and increases in costs of construction and maintenance are also of concern.

To this end, we note that these issues are more relevant to the *administrative processes* that need to be developed by way of MOUs between the Commonwealth and the States, the associated 'Notes of Administration' and Schedules to the Act.

From our understanding, the Act provides the overarching framework for these processes and hence there is little in the way of argument about the proposed changes to the Bill. Having said that, we consider that there ought to be transparency in the agreements that are struck between the jurisdictions and we would expect these – and the Notes of Administration - to be made available on a Departmental website in due course.

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WORLD WIDE AFFILIATION THROUGH THE AIT AND FIA



However, we do note that under proposed changes to the Bill, funding for Black Spots can now be allocated to projects on the National Network (Part 7 of the Principal Act). This is particularly welcome and is something that AAA has argued for over many years. We therefore support this amendment as it will definitely now allow treatment of high risk sections on the National Network. We would go further though and argue that in many cases, funding should not have to wait until a particular road has a Black Spot history. A large percentage (approximately 50 per cent) of fatalities on our roads occur on 'spots' where no fatality has occurred in the recent past and hence would not qualify as a Black Spot.

A highly relevant criterion for assessing where 'road safety', and/or Black Spot funding could be allocated is via the star rating criteria established under the Australian Road Assessment Program (AusRAP) developed by AAA. These star ratings take account of the *engineering features* (not crash history) of a road (e.g. duplication, lane and shoulder width, roadside hazards, intersections). By using this criterion, we do not need to wait for a crash to happen.

A very high percentage (55 per cent) of the National Network is only rated 3-stars (a maximum of five stars is achievable) and funding could be allocated to those links – and perhaps more importantly, those links that are only rated 2-stars (3 per cent of the National Network). A detailed listing of the star rating of links along the entire National Network can be found in an AusRAP report ('Safer Roads Save Lives', September 2007) at [www.ausrap.org](http://www.ausrap.org)

In relation to Part 6 of the Act, we note that amendments will allow funding for projects which are off the National Land Transport Network (off-network projects) and which are not in regional areas of Australia (as well as off-network projects that are in regional areas). It is our understanding that this amendment is designed to clarify what could always have been funded in the past. If so, this is not a concern for us. Rather our concern relates to the lack of any reference to the criteria for funding such off-network projects. In our view, this needs to be made more transparent, either by reference in the Act or in the supporting administrative arrangements. Benefit-cost criterion needs to be established to justify such investment in off-network projects – indeed all projects on the National Network.

We trust these comments on the Bill are of value to the Committee.

Yours sincerely



John Metcalfe  
**DIRECTOR, RESEARCH & POLICY**

