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Luis Gutiérrez  
National Transport Commission  
Level 3/600 Bourke  
Adelaide SA 5000

Via email: [enquiries@ntc.gov.au](mailto:enquiries@ntc.gov.au)

Dear Mr Gutiérrez,

**RE: Developing technology-neutral road rules for driver distraction**

As part of our commitment to standards and professionalism RACS strives to take informed and principled positions on issues associated with the delivery of health services. RACS has a long history of road safety advocacy. We regularly revise and update our positions in accordance with safety measures that undergo ongoing research and development by a large 'road safety' industry.

Distraction is a serious and growing challenge to road safety, and it is increasingly emerging as a factor in fatal road accidents over the past decade. A strong regulatory system that is adaptive and agile enough to keep pace with the rapidly changing technological landscape is needed. Of the four options proposed, RACS supports the hybrid option which combines elements of the prescriptive and performance-based approach.

While this option is the most favourable of those presented, one of the notable gaps in the consultation document was a lack of available evidence to determine the role that distractions play in road trauma. Without greater investment in data collection, this will continue to be a problem when reviewing the legislation in the future.

It is also important that legislation is not the only measure used to combat the risks of driver distraction. For example, ongoing awareness campaigns, as well as continued investment in research and innovation into vehicle safety both play a vital role in combating driver distraction.

Finally, RACS would like to endorse in full the submission provided to this consultation by the Transport and Road Safety (TARS) Research Centre. RACS has previously collaborated with TARS to advocate for road safety and, as the subject matter experts in this field, TARS are well placed to advise governments at all levels.

Yours Sincerely,



Dr John Crozier  
**RACS Trauma Chair**