



An Roinn Iompair
Department of Transport

**Call for Submissions:
Review of Road Safety Authority**

Consultation Response Document

March 2024

Introduction

The Department of Transport ('the Department') is currently undertaking a review of Ireland's Road Safety Authority (RSA). An independent third party, Indecon International Consultants, have been appointed to conduct this review on behalf of the Department.

Background to Review

Mission and functions of the RSA

The background to this review is that the RSA is a statutory organisation created by the Road Safety Authority Act 2006. The mission of the RSA is to save lives and prevent injuries by reducing the number and severity of collisions on the road. The RSA, in conjunction with other Road Safety Partners and the Department of Transport, is responsible for the preparation and implementation of the Government's Road Safety Strategy 2021-2030.¹

The RSA's functions are set out in Section 4 of the Road Safety Authority Act 2006, the Road Safety Authority (Conferral of Functions) Order 2006 (S.I. No. 477 of 2006), the Road Safety Authority (Commercial Vehicle Roadworthiness) Act 2012, and certain provisions of the Road Traffic Acts. Its key functions include:

- Road safety promotion, education, and awareness
- Road safety and collision research
- Primary responsibility as the lead agency for the governance and implementation of the government's Road Safety Strategy
- Driver testing and driver licensing
- Governance and supervision of the National Car Testing Service and Commercial Vehicle Roadworthiness Testing
- Enforcement of a range of road haulage industry and driver regulations
- Regulation of the driving instruction industry
- Development and monitoring of vehicle standards
- Advising the Department of Transport and the Minister for Transport on all aspects of road safety public policy.

Purpose of this Document

We wish to hear the views of the interested groups and the wider public. To facilitate this, the Department is inviting you to complete this consultation questionnaire and return it by email to RSAreview@transport.gov.ie by 11:59pm, Friday 5 April 2024. Please insert 'Public consultation on review of RSA' in the subject field of your email.

¹ [Ireland's Government Road Safety Strategy 2021 - 2030 \(rsa.ie\)](https://www.rsa.ie/road-safety-strategy-2021-2030)

Please be aware that Indecon will analyse responses to this consultation on behalf of the Department, and that your response may be subject to the provisions of the Freedom of Information Act 2014 (FOI).

Consultation Questions

Views on Services Provided by the RSA

Q 1. The RSA currently provide a range of services and functions, including Driver Testing and Licencing, NCT and CVRT Vehicle Testing, road safety advice, road safety promotional and media campaigns, and road safety education programmes, as well as working with other stakeholders to enhance road safety enforcement and inputs to road safety legislation. What do you believe to be the most important of these services and functions? And are there any other services or functions which the RSA should be undertaking that they are not undertaking currently?

At this stage in their development it has become apparent that the Road Safety Authority is no longer fit for purpose and should be wound down, another organisation formed and the services provided reassessed. Already this year (2024) we have experienced some of the worst numbers for road deaths recorded. Considering the Authority was formed in 2006 this is a damning indictment of the effectiveness of the RSA. It has become an organisation rooted in Ireland's car dependent culture to the detriment of all other street and road users.

Each year, pedestrians are among the most vulnerable road users, facing risks from speeding vehicles, distracted driving, impaired driving, and inadequate pedestrian infrastructure. While overall road traffic fatalities have decreased in recent decades, pedestrian fatalities have not seen a proportionate decline, indicating persistent challenges in addressing pedestrian safety. Demographic disparities exist in pedestrian fatalities, with certain groups facing higher risks than others. Vulnerable populations such as children, older adults, and individuals with disabilities are disproportionately affected by pedestrian accidents, often due to reduced mobility, sensory impairments, or cognitive limitations. Addressing the specific needs of these populations is essential for reducing pedestrian fatalities and promoting equitable road safety outcomes.

The RSA has notably failed to take a leadership role on issues that would actually lead to safer roads and streets such as red light camera based enforcement, the further implementation of average speed zones, increased enforcement of parking and road traffic violations, and policy support to local authorities in the provision of safety infrastructure.

The Road Safety Authority provides inadequate services to the following groups: rural areas in the provision of road safety strategies, centering the experience of vulnerable road users and those with

disabilities in the work of the RSA or tackling high risk groups and working in collaboration with relevant stakeholders to achieve the best outcomes.

Firstly rural road safety, with high speeds and dangerous overtaking a common occurrence, is one of the most complex and relevant areas for attention though the RSA continues to be largely silent on it. While urban areas benefit from better infrastructure, stricter enforcement, and higher levels of public awareness, rural regions often face unique challenges that demand tailored solutions. Narrow roads, inadequate lighting, and reduced access to emergency services as a result of the previously raised issues are just a few of the factors contributing to heightened risks. Despite the recognition of these issues, the RSA's initiatives predominantly focus on urban centres, leaving rural communities underserved and vulnerable.

Secondly there exists a gap in the RSA's outreach and engagement strategies, particularly concerning vulnerable road users. Pedestrians, cyclists, and motorcyclists are disproportionately affected by road accidents, yet initiatives targeting their safety remain insufficient. Educational campaigns, infrastructure improvements, and policy interventions tailored to these groups are crucial in mitigating risks and fostering a culture of road safety. However, the RSA's efforts in this regard have been inadequate, failing to address the specific needs and challenges faced by vulnerable road users. In fact the RSA consistently focuses on actions or changes in behaviour by the vulnerable road user rather than the source of the risk i.e. the vehicle driver. The continued promotion of high viz to school children is a particularly egregious example of this misguided and unhelpful policy position.

While the RSA has made strides in enhancing road safety awareness among the general population, there remains a gap in targeting high-risk demographics, such as young drivers and older adults. Young drivers, in particular, are overrepresented in road accidents, often due to factors like inexperience, peer pressure, and reckless behaviour. Tailored educational programs, stricter licensing requirements, and targeted enforcement measures are essential in addressing this issue.

Thirdly, the effectiveness of the RSA's enforcement measures is hampered by gaps in resources and coordination with other relevant agencies. While legislation and enforcement play a crucial role in deterring dangerous driving behaviours, resource constraints and inconsistencies in enforcement practices undermine their impact. Strengthening collaboration between the RSA, law enforcement agencies, and local authorities is essential in addressing these gaps and ensuring a more cohesive approach to road safety enforcement. Addressing the gaps in RSA services requires a multifaceted approach that encompasses policy reforms, resource allocation, community engagement, and

stakeholder collaboration. Investing in infrastructure improvements, particularly in rural areas, is paramount to mitigating risks and enhancing road safety outcomes. Moreover, targeted educational campaigns, outreach programs, and enforcement initiatives tailored to high-risk demographics and those road users who are actually a danger to others rather than vulnerable road users are imperative in closing the existing gaps in RSA services.

Q 2. Do you have any other views on the focus and balance of the Road Safety Authority's functions, between the driver and vehicles testing and licensing services it delivers to the public, on the one hand, and the road safety policy, promotion, education, and research functions it undertakes, on the other? (See: [Role of the RSA](#))

As previously stated the Road Safety Authority has significantly failed in reaching its own stated aims in a number of areas and it would be advisable to disband the Authority and form a new organisation with more relevant and effective structures.

On Safety Promotion

The primary role of the Road Safety Authority is to further road safety policy and education. The RSA has not previously or currently placed accessibility or the vulnerable road user at the centre of its education or policy work. The main source of injury or death on Irish roads is motorised vehicles. Rarely, through collision or accident, is any other road user permanently harmed without the involvement of a car, van or lorry. And while the use of scooters and electric bikes will need to be addressed in future policy and road strategies, very little data exists to suggest they represent a significant risk to those on our streets and roads. However the RSA continues to pursue strategies that seek behavioural change in pedestrians and vulnerable road users while largely ignoring driver behaviour. This 'educates' the public that even though one participant in a traffic accident may be operating a dangerous and heavy vehicle while another is simply walking they are both somehow culpable.

The most regrettable example of this is the RSA's continued commitment to 'educate' the small children of Ireland that they have some responsibility to wear high visibility clothing in order to protect themselves from being hit by a car/van/lorry. This is a hugely flawed and damaging approach for a number of reasons.

Relying solely on high visibility vests to mitigate the risk of children being hit by cars overlooks the root causes of pedestrian accidents. While visibility is undoubtedly important, it should not serve as

a substitute for addressing broader issues such as driver behaviour, road infrastructure, and safe crossing practices. Focusing exclusively on the visibility of pedestrians places undue responsibility on vulnerable road users while absolving drivers of their obligation to exercise caution and adhere to speed limits.

Moreover, the efficacy of high visibility vests in preventing accidents involving children has been called into question. Research suggests that the effectiveness of such vests in improving pedestrian visibility is limited, particularly in low-light conditions or when drivers are distracted. While high visibility clothing may make children more noticeable, it does not guarantee that drivers will react appropriately or in time to avoid a collision. Therefore, investing resources solely in high visibility vests may provide a false sense of security without addressing the underlying factors contributing to pedestrian accidents.

There are potential unintended consequences of promoting high visibility vests for children. Relying on this measure could inadvertently shift the burden of responsibility onto young pedestrians, reinforcing the notion that they are solely responsible for their safety on the roads. This undermines efforts to promote a culture of shared responsibility among all road users and could exacerbate victim blaming in the event of an accident.

While the idea of providing high visibility vests to school children as a means of enhancing road safety may seem well-intentioned, it is ultimately a flawed and insufficient approach. Addressing the complex issue of pedestrian safety requires a comprehensive strategy that encompasses a range of measures, including improved road infrastructure, enhanced driver education, and community engagement initiatives. Rather than placing the onus on children to make themselves more visible to drivers, policymakers should prioritise initiatives that address the underlying causes of pedestrian accidents and promote a culture of shared responsibility on the roads.

On the Provision of Driver Services

The RSA is responsible for a number of services around driving licences and tests that have continued to worsen in service provision over the last number of years. For many aspiring drivers, the prospect of facing months-long delays before being able to take their test is not only frustrating but can also have significant implications for their mobility and daily lives. Test centres seem often to operate at or near capacity, with a finite number of examiners available to conduct tests. This

bottleneck effect means that even minor disruptions, such as examiner shortages or inclement weather conditions, can have ripple effects throughout the system, further prolonging waiting times.

The consequences of long waiting lists for driving tests extend beyond mere inconvenience. For many individuals, particularly those living in rural areas with limited public transportation options, having a driver's licence is essential for accessing employment, education, and essential services. Prolonged waiting times can therefore have profound socioeconomic implications, exacerbating existing inequalities and hindering individuals' ability to fully participate in society.

Furthermore, the backlog in driving tests can also pose safety concerns. Without a valid licence, individuals may resort to driving without proper training or supervision, putting themselves and others at risk on the roads. This underscores the importance of addressing the underlying causes of the waiting list problem and implementing effective solutions to ensure that aspiring drivers can undergo testing in a timely manner.

There is a need for greater transparency and communication regarding waiting times, allowing individuals to better plan and manage their expectations.

Similarly the RSA is responsible for the provision of services to provide NCTs to private vehicles. The growing issue of long waiting times for NCT appointments has become a significant concern for car owners across the country. This gridlock in scheduling appointments not only inconveniences individuals but also poses potential risks to road safety and environmental standards.

While the RSA has reported average waiting times of 17.5 days in 2023 this data does not reflect the proportion of drivers who wait up to 5 months for appointments. One of the primary reasons for the backlog in NCT appointments seems to be inadequate infrastructure and resources allocated to the service. Despite efforts to expand testing centres and staff, the rapid growth in the number of vehicles on Irish roads has outpaced the capacity of the NCTS. This shortfall in resources has led to a bottleneck effect, with appointment slots filling up quickly and limited availability for new bookings. Moreover, the seasonal fluctuations in demand exacerbate the problem. During peak times, such as before the summer holidays or Christmas, the waiting times can stretch even longer, leaving car owners frustrated and struggling to secure timely inspections. The lack of flexibility in scheduling further compounds the issue, as individuals are often left with no choice but to endure prolonged waiting periods or risk driving without a valid NCT certificate.

The consequences of extended waiting times for NCT appointments extend beyond mere inconvenience. Firstly, it undermines road safety standards by allowing potentially unsafe vehicles to remain on the road for extended periods. Vehicles that have not undergone proper inspections may have defects or faults that compromise their ability to operate safely, posing risks to both the occupants of the vehicle and other road users.

Secondly, the delay in NCT inspections contributes to environmental degradation. Vehicles that do not meet emissions standards continue to emit pollutants into the atmosphere, exacerbating air quality issues and contributing to climate change. With Ireland committed to reducing its carbon footprint and meeting its environmental targets, ensuring timely NCT inspections is essential for upholding these objectives.

The long waiting times for NCT appointments also have economic implications. Car owners may face financial repercussions due to the inability to use their vehicles for work or other essential activities while awaiting inspection. Furthermore, businesses reliant on transportation, such as delivery services or taxi companies, may experience disruptions or increased costs as a result of vehicle downtime.

Views on the approach to funding of the RSA

Q 3. The RSA's functions and operations are mostly self-funded, from the fees it charges for the provision of services, including driver licensing and testing, and passenger and commercial vehicle roadworthiness testing services (the NCT and Commercial Vehicle Roadworthiness Testing), with little direct Exchequer/public funding received. What are your views on this self-funding model rather than an exchequer funded model or a mixed funding model?

Decoupling road safety funding from the profits of testing of motorised vehicles and licensing of drivers will be vital if we are to reduce the huge numbers of injury and death caused by motor vehicles in our society.

Similar to how the Health & Safety Authority is primarily funded directly by the Department of Enterprise, Trade and Employment and the Food Safety Authority of Ireland is funded directly by the Department of Health, the Road Safety Authority needs to be funded directly by the Department of Transport instead of relying on self-funding through motoring licensing and regulation.

Views on the future of the RSA

Q 4. Do you have any views on the future role of the Road Safety Authority?

If the RSA is to continue it must reassess its stated aim and objectives to place the experience of vulnerable road users, those with disabilities and non drivers at the centre of its policy work. Creating roads and streets that operate safely and that are accessible and inclusive for people with disabilities is not just a matter of compliance; it's a fundamental aspect of creating vibrant, equitable communities. The design of streets impacts the quality of life and mobility of individuals with disabilities, shaping their ability to participate fully in social, economic, and recreational activities.

One of the fundamental aspects of improving road and street safety for people with disabilities is ensuring that infrastructure is accessible to all. This includes installing curb ramps, tactile paving, and accessible pedestrian crossings at intersections to facilitate safe and independent travel for individuals with mobility impairments and visual impairments. Accessible infrastructure not only enhances safety but also promotes inclusivity and independence.

Clear and visible signage is essential for guiding individuals with disabilities safely through roadways and public spaces. High-contrast signage with large fonts and symbols can aid individuals with visual impairments or cognitive disabilities in navigating streets more effectively. Providing Braille translations and tactile maps at key locations further enhances accessibility and ensures that important information is accessible to everyone. Audible and tactile signals at pedestrian crossings are invaluable for individuals with visual impairments, allowing them to navigate intersections safely.

Improving road and street safety for families, those with mobility challenges and people with disabilities also involves ensuring that public transportation is safe, reliable, affordable and accessible. For the RSA this includes helping to develop accessible bus stops and train stations with level boarding platforms, ramps, and lifts for wheelchair users. Additionally, ensuring that public transportation vehicles are equipped with securement systems and priority seating for individuals with disabilities promotes safety and accessibility for all passengers. A focus on multi-modal transport strategies is sorely lacking from the RSA's policy work.

Improving road and street safety for everyone is an ongoing process that requires continuous evaluation and improvement. The RSA must work with all stakeholders to regularly assess the effectiveness of existing safety measures and solicit feedback from individuals with differing needs to identify areas for enhancement. By prioritising accessibility and safety in street design and maintenance, communities can create environments that are welcoming and inclusive for everyone.

Q 5. Do you think there are any functions currently undertaken by the RSA that would be better delivered by another body/agency or any functions completed by others that would be better undertaken by the RSA?

The RSA has consistently withheld important data on roads and road safety for an extended period of time and while the RSA should be disbanded more generally this function should be removed from the authority as a matter of urgency. For eight years, Ireland's Road Safety Authority (RSA) has held onto a crucial piece of information: crash location data.

The RSA's rationale for withholding crash location data remains ambiguous. Speculations suggest concerns over privacy, data security, or bureaucratic hurdles, yet no official statement has offered clarity. Regardless of the reasons, the consequences of this decision are profound. The lack of access to crash location data impedes evidence-based policymaking and targeted interventions. Local councils and transport bodies play pivotal roles in implementing safety measures and infrastructure improvements. Without accurate and up-to-date crash data, their ability to identify high-risk areas and prioritise resources effectively is severely compromised. By withholding this information, the RSA inadvertently hampers the very efforts aimed at reducing road accidents and fatalities. The absence of shared crash location data inhibits collaboration and coordination among stakeholders. Road safety demands a cohesive approach involving various agencies and organisations. Without access to comprehensive data, these entities are unable to align their strategies or pool resources efficiently. The RSA's decision thus undermines the potential for collective impact.

Data-driven insights are invaluable for identifying trends, patterns, and emerging risks. By restricting access to such data, the RSA stifles innovation and limits the potential for technological advancements that could save lives on Irish roads. By withholding crash location data, the RSA creates a veil of secrecy that erodes public trust and confidence. Citizens have a right to know about the safety of their roads and the efforts being made to address any shortcomings. The lack of transparency not only fosters scepticism but also limits public engagement in initiatives aimed at enhancing road safety.

The lack of shared crash location data also perpetuates inequalities in road safety outcomes. Vulnerable road users, such as pedestrians, cyclists, and motorcyclists, and those with mobility issues or disabilities are disproportionately affected by accidents. Access to comprehensive crash

data is essential for identifying and addressing disparities in safety outcomes across different demographic groups and geographical areas. Without this information, efforts to promote equity in road safety remain stunted

Efforts should be made to streamline data sharing processes and enhance collaboration among relevant agencies and organisations. Establishing a centralised platform for accessing crash data, while ensuring compliance with data protection regulations, could facilitate more effective coordination and resource allocation

Engagement with the RSA

Q6. Please indicate any involvement you may have with the work of the organisation and your views on their road safety information campaigns, education work or other services.

Other Comments

Q7. Finally, please provide any other comments which you feel may be of relevance to this review of the RSA.

The Road Safety Authority is no longer fit for purpose and should be wound down, another organisation formed and the services provided reassessed. Already this year we have experienced some of the worst numbers for road deaths recorded. Considering the Authority was formed in 2006 this is a damning indictment of the effectiveness of the RSA.