



Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts  
GPO Box 594  
Canberra ACT 2601

By email: [officeofroadsafety@infrastructure.gov.au](mailto:officeofroadsafety@infrastructure.gov.au)

Dear Sir/Madam

### **Regulatory Impact Analysis to reduce the open road default speed limit**

Thank you for the opportunity to provide feedback on proposed changes to the Australian Road Rules regarding the speed limits on sealed and unsealed roads outside of built-up areas where there are no sign-posted speed limits. The broader objective of the proposed changes is to improve safety.<sup>1</sup>

### **About the Animal Defenders Office**

The Animal Defenders Office (ADO) is a nationally accredited not-for-profit community legal centre specialising in animal law and providing free legal services to the community. The ADO is a member of Community Legal Centres Australia Inc., the national peak body representing community legal centres across Australia. The ADO does not receive government funding. Established in 2013, the ADO has been run by volunteers since that time.

Further information about the ADO can be found at [www.ado.org.au](http://www.ado.org.au).

### **Support for the proposed changes to default speed limits**

The ADO supports amending the Australian Road Rules<sup>2</sup> to reduce the open road default speed limit and to introduce a (low) default speed limit for unsealed roads to improve road safety for both human and non-human animals.

The ADO notes, however, that reducing or introducing speed limits will only achieve the broader safety objective if they are enforced.

### **Changing the Australian Road Rules**

The ADO acknowledges the complex framework for responsibility for roads and road safety in Australia, with all three levels of government (local, state and federal) playing a role. For example, the legal classification of, and government responsibility for, a single road in Australia can vary from section to section of the one road.<sup>3</sup>

<sup>1</sup> <https://www.infrastructure.gov.au/have-your-say/regulatory-impact-analysis-reduce-open-road-default-speed-limit>.

<sup>2</sup> [https://pcc.gov.au/uniform\\_legislation\\_official\\_versions.html](https://pcc.gov.au/uniform_legislation_official_versions.html).

<sup>3</sup> See for example the Roads Act 1993 (NSW) s 7.

The ADO is aware that the default speed limit for non-built-up areas is currently 100 kilometres per hour (**km/hr**).<sup>4</sup> This is specified in the Australian Road Rules, which are model rules on which states and territories base their own road rules.

The Australian Road Rules do not specify a default speed limit for unsealed roads.<sup>5</sup>

The ADO submits that amending the Australian Road Rules to reduce the default speed limit outside of built-up areas and to introduce a default speed limit for unsealed roads would provide clarity and certainty for governments and authorities about this important road safety issue.

### **Reducing speed limits helps all road users**

#### *Reducing speed limits protects humans*

The ADO agrees with the strong evidence in the *Consultation Regulatory Impact Analysis*<sup>6</sup> linking a reduction in speed limits to road safety and supporting the need for government action on this issue.<sup>7</sup> In particular the ADO notes recent road safety trends of an increase in fatalities (p 18), the cost of road trauma in terms of economic and social consequences (p 21), and emerging research pointing to speed as the largest individual factor in vehicle crashes (p 23).

Lower speed limits would also help states and territories achieve their own road safety objectives. For example, according to the NSW Government, speeding is the single biggest killer on NSW roads, contributing to approximately 40% of fatalities each year.<sup>8</sup> To help tackle this significant public safety issue, the NSW Government has released its ‘2026 Road Safety Action Plan’ which sets out ‘new targets to halve deaths and reduce serious injuries by 30 per cent on NSW roads by 2030’.<sup>9</sup>

#### *Reducing speed limits protects wildlife*

There is evidence to support the proposition that reducing speed limits not only protects humans but also non-human animals with whom vehicles often collide.

Collisions with wildlife lead to significant road safety hazards across Australia.<sup>10</sup> This is recognised by state and territory governments. For example, in August 2024 Victoria

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<sup>4</sup> Rule 25(3)(b).

<sup>5</sup> <https://www.infrastructure.gov.au/have-your-say/regulatory-impact-analysis-reduce-open-road-default-speed-limit>.

<sup>6</sup> Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, *Consultation Regulatory Impact Analysis. Reducing default speed limits outside of built-up areas*, September 2025.

<sup>7</sup> Ibid, Chapter 2 ‘Statement of the problem’.

<sup>8</sup> <https://www.transport.nsw.gov.au/roadsafety/topics-tips/speeding/enforcement-cameras/average-speed-cameras>.

<sup>9</sup> <https://towardszero.nsw.gov.au/roadsafetyplan>.

<sup>10</sup> <https://www.ecb.com.au/blogs/articles/animal-collision-hotspots-across-australia>,  
<https://www.wildlifevictoria.org.au/news/reducing-wildlife-road-toll>,  
<https://www.paintandpanel.com.au/news/news/animal-collisions-on-the-rise-in-wa-and-sa> (25/08/2025),  
<https://www.abc.net.au/news/2023-06-03/nt-katherine-named-worst-hotspot-animal-crash/102416132>,

established a parliamentary inquiry into wildlife roadstrike in Victoria.<sup>11</sup> Victoria's peak wildlife rescue organisation, Wildlife Victoria, has reported that calls for assistance related to wildlife vehicle collisions have increased by 288% in the last 10 years. In NSW the government agency Transport for NSW launched its 'Animals on country roads' public education initiative in 2025.<sup>12</sup> Tasmania is gaining the reputation of being the 'roadkill capital of the world'.<sup>13</sup>

When it comes to wildlife collisions in non-built-up areas, insurance companies are very aware of the 'costly consequences of wildlife collisions on our country roads'.<sup>14</sup> An AAMI Senior Executive recently stated that 2025's wildlife crash data is a sobering reminder 'to take care on country roads',<sup>15</sup> with kangaroos being the most hit animals.<sup>16</sup>

Recent research supports the proposition that reducing speed limits in rural and non-built-up areas improves wildlife protection and reduces fatalities and injuries to road users.<sup>17</sup>

However, despite the evidence, Governments have been slow to implement effective measures to enhance road safety and wildlife protection<sup>18</sup> such as wildlife corridors, overpasses<sup>19</sup>, and fencing (virtual and actual)<sup>20</sup>.

The ADO submits that the relatively low-cost measure of reducing (or introducing low) default speed limits could help governments avoid liability for the foreseeable risk of injuries from vehicle collisions with wildlife<sup>21</sup> while they implement more involved measures such as overpasses or other wildlife road crossing structures.<sup>22</sup>

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<https://www.racq.com.au/latest-news/news/2024/04/animal-collisions-up-by-25-percent-on-queensland-roads> (30/04/2024).

<sup>11</sup> <https://www.parliament.vic.gov.au/wildliferoadstrike>. The Inquiry's report is due by 30/11/2025.

<sup>12</sup> Transport for NSW media release 'Slow down and look out for animals on country roads' (19/05/2025):

<https://www.transport.nsw.gov.au/news-and-events/media-releases/slow-down-and-look-out-for-animals-on-country-roads>. See also <https://www.moffittsfarm.com.au/2025/03/22/connection-between-wildlife-and-road-casualties-unrecognised-in-vision-zero-2050/> (22/03/2025).

<sup>13</sup> <https://www.rspcatas.org.au/look-out-for-wildlife-in-national-road-safety-week-2/>.

<sup>14</sup> <https://www.suncorpgroup.com.au/news/news/aami-wildlife-crashes-hotspots-2025> (28/08/2025).

<sup>15</sup> Ibid.

<sup>16</sup> Ibid.

<sup>17</sup> [https://www.sydneybasinkoalanetwork.org.au/why\\_speed\\_matters\\_for\\_koalas](https://www.sydneybasinkoalanetwork.org.au/why_speed_matters_for_koalas) (18/12/2024); [https://www.chiefscientist.nsw.gov.au/\\_data/assets/pdf\\_file/0022/1489/Report-2\\_CPCP-and-principles-for-koalas\\_May-2021.pdf](https://www.chiefscientist.nsw.gov.au/_data/assets/pdf_file/0022/1489/Report-2_CPCP-and-principles-for-koalas_May-2021.pdf) (see esp. Appendix 2, p 36).

<sup>18</sup> For example, on 10 December 2024 Campbelltown City Council unanimously voted to write to NSW and Australian Ministers to encourage koala protection initiatives along roads including installing effective koala fencing and additional crossings (Campbelltown City Council, 'Minutes Summary', 10 December 2024, p 15).

<sup>19</sup> See for example Brisbane's successful Compton Road overpass: <https://gecko.org.au/wp-content/uploads/2024/06/Compton-Road-overpass-20240325.pdf>.

<sup>20</sup> For efforts to petition governments to install virtual wildlife fencing to help protect wildlife including kangaroos, see: <https://epetitions.parliament.act.gov.au/details/e-pet-031-25>.

<sup>21</sup> *Tait v Goondiwindi Regional Council* [2019] QDC 208 (Council found liable in negligence for failing to secure warning signs on rain-affected parts of the Leichhardt Highway).

<sup>22</sup> Campbelltown City Council's resolution regarding koala protection initiatives on roads in its local government area included seeking the commitment of NSW and Australian Ministers to 'reducing the speed limits at known koala crossing points on Appin Road from dusk to dawn' (Campbelltown City Council, 'Minutes Summary', 10 December 2024, p 15).

The ADO also submits that reducing speed limits to 40 km on known wildlife corridors outside of built-up areas could significantly increase the likelihood of avoiding collisions with wildlife on roads.<sup>23</sup> The research shows, for example, that if a wombat crosses a road 40 metres in front of a car travelling at 80 km/hr, there is no time to brake and the wombat would be killed. If the car is travelling at 60 km/hr, the car can start to brake which reduces the impact and the wombat may survive. At 40 km/hr, the car has time to stop and allow the wombat to cross, avoiding a collision with potentially fatal consequences to those in the car and to the wombat. This is extremely important not only from an animal welfare perspective but also from a conservation perspective when endangered and threatened animals such as koalas are killed on our roads.<sup>24</sup>

Reducing the likelihood of wildlife collisions in non-built-up areas is also important because it can be more difficult and takes more time for rangers and wildlife carers to attend collision sites in these areas to deal with injured animals who may be in extreme pain due to their injuries.

#### *Enforcement of speed limits*

The ADO notes that if default speed limits are lowered/introduced in rural and remote areas, enforcement measures such as speed cameras may be required to ensure the changes achieve their safety goals.

Research indicates a strong correlation between speed cameras and reduced accident rates, with an Australian study showing that areas with speed cameras experienced a 35% drop in serious injury accidents.<sup>25</sup>

The ADO submits that Governments will need to consider using more speed cameras outside built-up areas to enforce the new reduced speed limits.

In conclusion, the ADO supports the proposed changes to the Australian Road Rules to lower the default speed limit outside of built-up areas and to introduce a (low) default speed limit for unsealed roads, to save not only human lives but also individual wild animals and endangered native species. The ADO notes, however, that more enforcement mechanisms, such as speed cameras, will be required in these areas to ensure that the new speed limits achieve their broader policy goal of enhanced road safety.

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<sup>23</sup> [https://www.sydneybasinkoalanetwork.org.au/why\\_speed\\_matters\\_for\\_koalas](https://www.sydneybasinkoalanetwork.org.au/why_speed_matters_for_koalas);  
<https://www.nsw.gov.au/driving-boating-and-transport/roads-safety-and-rules/safe-driving/safe-stopping-distance>.

<sup>24</sup> See for example: <https://www.theguardian.com/world/2024/nov/13/nsw-housing-development-koala-deaths-appin-road-campbelltown>;  
[https://www.sydneybasinkoalanetwork.org.au/will\\_koalas\\_lose\\_this\\_corridor](https://www.sydneybasinkoalanetwork.org.au/will_koalas_lose_this_corridor);  
[https://www.sydneybasinkoalanetwork.org.au/appin\\_road\\_upgrade](https://www.sydneybasinkoalanetwork.org.au/appin_road_upgrade); <https://www.abc.net.au/news/2024-01-22/appin-road-upgrade-approval-koala-corridors/103373506>.

<sup>25</sup> <https://www.speedhumpsaustralia.com.au/speed-cameras-reducing-accidents/>.

Thank you for taking our submissions into consideration.

Yours sincerely

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Volunteer solicitors  
Animal Defenders Office

10 November 2025