



## Submission: Consultation Regulatory Impact Analysis – Reducing default speed limits outside of built-up areas

November 2025

**For Enquiries:**

**Keli McDonald**

CEO, NRWC

Phone: 02 6742 6831 | 0429 435 239

Email: [ceo@nrwc.com.au](mailto:ceo@nrwc.com.au)

Website: [www.nrwc.com.au](http://www.nrwc.com.au)

## Acknowledgement of Country

The National Rural Women's Coalition pays our respects to the ancestors, elders and especially the women that are a part of the longest living civilisation on earth, the First Nation peoples of Australia. We acknowledge their strength and resilience. They are the custodians of the land, and we celebrate together their right to continue with cultural practices on the land and water where they live.

## About the National Rural Women's Coalition

The National Rural Women's Coalition (NRWC) is a national advocacy organisation representing women in regional, rural and remote (RRR) Australia. We support policies that enhance gender equity, social inclusion, and economic participation, particularly for women and children in under-resourced areas.

We play a critical role in advancing gender equity in health, education, and economic opportunities for women and children in RRR Australia. The NRWC works to amplify the voices of RRR women, ensuring that their unique challenges, such as limited access to services, geographic isolation, and economic disparities are understood, highlighted and addressed through policy advocacy, emancipatory programs and initiatives. By focusing on intersectional barriers like gender, location, and socio-economic status, the NRWC strengthens RRR women's capacity to influence system change, advocating for gender-responsive policies, and economic empowerment initiatives. This work is crucial because RRR women often face greater inequities and have access to fewer resources than their urban counterparts. The NRWC therefore, engages in targeted action essential to achieving true gender equity and social inclusion across Australia.

The NRWC works tirelessly to address systemic disparities in all aspects of women's lives in RRR Australia. We advocate for women, their children, families and communities arguing that gender is not an incidental label which confines and erodes choice, but it is the result of entrenched power structures that marginalise certain people, especially in RRR communities. Addressing these inequities requires targeted policy interventions that actively dismantle structural oppression and promote meaningful inclusion, ensuring that all women in RRR communities, particularly those historically disadvantaged, have equitable access to resources and opportunities.

The NRWC's represents women, in all their diversity, living in rural, regional and remote Australia and is supported through peak member organisations, Australian Local Government Women's Association, Australian Women in Agriculture, National Rural Health Alliance, Women in Seafood and Transport Women Australia Limited.

## Introduction

The NRWC makes this submission to the consultation on the Regulatory Impact Analysis (RIA) for reducing default speed limits outside of built-up areas. While the NRWC understands and values the need to reduce road fatalities and injuries, we believe a reduction in default speed limits outside of built-up areas would unfairly impact rural women. The effects on rural women and associated costs need to be considered in the RIA methodology.

The NRWC thanks the Minister for Infrastructure, Transport, Regional Development and Local Government for the opportunity to provide a submission informed by the lived experience of rural, remote and regional women. We thank these women for sharing their expertise and lived experience to inform this submission.

## Questions for stakeholders

- **Does the RIA adequately identify and define the problem?**

The RIA adequately explains the current road safety policy position of governments in Australia, as well as the need for improving road safety to reduce fatalities.

However, the RIA does not explain why all aspects of the Safe Systems Approach are not being considered to reduce fatalities and injuries.<sup>1</sup> Other aspects are safe roads, safe vehicles, safe road users, and post-crash care. The RIA states all of these interventions 'work together to improve road safety', as the Safe System Approach (and the RIA) acknowledges the 'multiplicative' nature of road safety interventions, which require a 'coordinated, multi-faceted approach'. All roads are complex microcosms of activity, which provide for wide array of needs. In rural areas, roads are often the only method of accessing essential needs, medical services and education, as well as being fundamental to business. The importance and complexity of activity on rural roads highlights the need to consider all aspects of the Safe System Approach, not only speed reduction. As stated in the RIA, it is acknowledged that many of these policy options may not be under the control of the Australian Government and may fall under the jurisdiction of local and state governments. However, no policy should be considered in isolation and the Australian Government's influence, control and funds extend beyond speed limits.

All Safe System Approach interventions are essential for rural roads, as many of these interventions, such as bus stop signs, quality road maintenance, delineator posts and post-crash ambulance care, are non-existent or limited in rural areas. Rural women are experienced in driving to the conditions of the road to accommodate for many obstacles, including kangaroos, livestock, blinding sunsets, caravans and trucks. Most roads with default speed limits do not have overtaking lanes so it is important and safer to be able to legally pass these vehicles quickly to reduce the amount of time spent on the wrong side of the road. Reducing speed limits will increase frustration and fatigue, while decreasing autonomy, concentration and personal responsibility for driving behaviour. Further, it will reduce the urgency and necessity to maintain rural roads resulting in further danger for drivers and long-term costs government will have to endure in the future.

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<sup>1</sup> Austroads 2021, *Guide to Road Safety*. Sydney.

The RIA also does not explain what population group needs to be targeted for policy change. A study of road fatalities in rural and remote Australia found that 'females, children aged 0-12 and Aboriginal and Torres Strait Islander peoples in very remote areas were identified as high-risk demographic groups in comparison with their major city counterparts'.<sup>2</sup> Further, studies often conflate the driver's home residence with the crash location so it is difficult to determine if urban drivers with less experience on rural roads need to be targeted. A study of risk and safety perception on urban and rural roads showed 'that drivers perceive rural roads as less risky than urban roads, even when similar scenarios occur in both environments' demonstrating that driver education on rural road hazards' risk is important.<sup>3</sup>

The gaps in the methodology, which will be detailed further below, demonstrate an absence of lived experience insight in the analysis' design. ACIL Allen Consulting, the firm undertaking the RIA analysis, has no rural offices, and it is understood, no rural representation in their project team. It is widely acknowledged that at a minimum consideration of lived experience input is best practice in policy and program development.<sup>4</sup> The NRWC advocates for qualitative research with rural people through interviews and focus groups be included in the methodology to address this gap.

The NRWC believes all aspects of the Safe Systems Approach and policy target populations need to be considered in the RIA methodology, as well as the lived experience of rural people, particularly rural women.

- **Are there any other problems not considered by this RIA?**

Please see detail in other answers.

- **Does the RIA establish a case for amending the default speed limits in the ARR?**

No, due to the limited methodology used. Please see detail in other answers.

- **Does the RIA present clear, well differentiated options that can achieve the stated policy objective?**

The options presented are void due to the limited methodology upon which they were derived. Please see detail in other answers.

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<sup>2</sup> Mason, H. M., Leggat, P. A., Voaklander, D., & Franklin, R. C. (2022). Road traffic fatalities in rural and remote Australia from 2006 to 2017: The need for targeted action. *The Australian journal of rural health*, 30(2), 252–263.

<sup>3</sup> Cox, J. A., Beanland, V., & Filtness, A. J. (2017). Risk and safety perception on urban and rural roads: Effects of environmental features, driver age and risk sensitivity. *Traffic injury prevention*, 18(7), 703–710.

<sup>4</sup> Mintrom, M., Grocott, L., & Sumartojo, S. (2024). Advancing policy design through creative engagement with lived experience: the Tomorrow Party. *Policy Design and Practice*, 7(1), 33–47.

- **Are there any other feasible options to address the problems identified in the previous chapter that have not been assessed in the RIA and should be considered?**

As previously stated, all aspects of the Safe System Approach need to be considered.

- **Are the objectives as expressed above appropriate?**

The objectives presented are supported by NRWC, however, additional objectives need to be added to contextualise road safety in rural areas. An additional objective needs to be added, which focuses on not causing additional and unnecessary burden and harm to rural populations. This is important as rural populations are already disproportionately affected by poor social determinants of health, as they 'often have lower incomes, lower educational attainment, and significant challenges with homelessness and overcrowded housing'.<sup>5</sup> Further, rural women carry both the burden of remoteness and gendered barriers, which are often heightened in rural settings.<sup>6</sup> The RIA objectives need to ensure this disadvantage is not enhanced by any proposed policy.

- **Are the lists of costs and benefits considered in this methodology sufficient to capture the costs and benefits of the proposed change?**

Cost Benefit Analysis requires equal consideration of both costs and benefits. The RIA cost and benefits framework includes an in-depth consideration of benefits, such as noise pollution and traffic flow, which are relatively minor issues in rural contexts. Yet the framework comprises minimal costs, which are only listed as travel time, government costs, social acceptance and public opinion. 'Symmetrical treatment' of both costs and benefits is best practice when using Cost Benefit Analysis.<sup>7</sup>

The Australian Government's Office of Impact Analysis states in its Cost Benefit Analysis Guidance Note that Cost Benefit Analysis should consider 'all the effects on the community and economy'.<sup>8</sup> The current RIA analysis does not consider a wide range of relevant costs, which have large impacts on the rural community. Particular costs for rural women that need to be considered relate to increased travel times resulting in reduced access to social networks, essential services, education and work, which further entrench gender inequity.

A reduction in default speed limits will increase isolation from services and social networks experienced by women when living on rural properties due to increased travel time. This will have flow on mental and physical health impacts for a population already experiencing poorer health outcomes when compared to their city counterparts.<sup>9</sup> Rural people are already

<sup>5</sup> National Rural Health Alliance. (2024). *Social determinants of health in rural Australia, Fact Sheet*. Canberra.

<sup>6</sup> National Rural Women's Coalition. (2023). *Position statement: Gender equality in regional, rural and remote Australia*. (Prepared by Elisia Ramsey). NSW.

<sup>7</sup> Dudley S, Belzer R, Blomquist G, et al. Consumer's Guide to Regulatory Impact Analysis: Ten Tips for Being an Informed Policymaker. *Journal of Benefit-Cost Analysis*. 2017;8(2):187-204.

<sup>8</sup> Office of Impact Analysis. (2023, July). *Cost-benefit analysis: Guidance note* (Office of Impact Analysis). Department of the Prime Minister and Cabinet. Australian Government. Canberra.

<sup>9</sup> Australian Institute of Health and Welfare (AIHW). (2024). *Rural and remote health*. Retrieved from <https://www.aihw.gov.au/reports/rural-remote-australians/rural-and-remote-health>

willing to travel nearly double the distance than metropolitan people to access a GP yet as distance increases they become less willing to travel for non-emergency primary health care.<sup>10</sup> When populations do not access preventative care, it is shown to increase acute care costs for government.<sup>11</sup> Targeting rural and remote preventative care is an explicitly stated aim of the Australian Government Department of Health National Prevention Health Strategy.<sup>12</sup> Further, rural people often have to drive to access emergency medical care, while rural ambulances are not accessible in their area, too far away or on another job. Often there are no out-of-hours doctors, so women travel hours to get access after-hour care for themselves or their families. These personal and government costs need to be included in the RIA.

The mental health costs of making people more isolated, lonely and remote due to travel time needs to be accounted for in the RIA. Mental health and suicide rates increase with remoteness.<sup>13</sup> An issue compounded by poor access to mental health services in rural localities. The Australian Institute of Health and Welfare (AIHW) reports that the age-standardised suicide rate for residents of very remote areas was 2.1 times that of the rate for residents of major cities.<sup>14</sup> Young rural women are particularly vulnerable.<sup>15</sup> Additionally, loneliness in rural areas increases the effects of mental health and participation in social groups can 'ameliorate loneliness'.<sup>16</sup>

Additionally, increased commuting times are shown to be directly correlated with decreased wellbeing.<sup>17</sup> Many women and children in rural areas have to commute to their local town for school and work. The hours rural students spend travelling on school buses is shown to adversely impact wellbeing.<sup>18</sup> Women, as primary carers, will face longer travel when taking their children to pre-school and childcare. Increased travel times are shown to already be a key barrier to accessing pre-school in rural areas.<sup>19</sup> Limited access to early childhood education and care has 'adverse health impacts on children and their parents', further

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<sup>10</sup> McGrail, M. R., Humphreys, J. S., & Ward, B. (2015). Accessing doctors at times of need – Measuring the distance tolerance of rural residents for health-related travel. *BMC Health Services Research*, 15, 212.

<sup>11</sup> National Preventive Health Strategy 2021-2030. (2021). *The value of prevention: Preventable ill-health is putting enormous pressure on the Australian healthcare budget*. Australian Government Department of Health. Canberra.

<sup>12</sup> National Preventive Health Strategy 2021-2030. (2021). *The value of prevention: Preventable ill-health is putting enormous pressure on the Australian healthcare budget*. Australian Government Department of Health. Canberra.

<sup>13</sup> AIHW. (2025). *Regional and remote communities – Suicide & self-harm monitoring*. AIHW website. Accessed 7 November 2025 at <https://www.aihw.gov.au/suicide-self-harm-monitoring/population-groups/regional-remote-communities>

<sup>14</sup> AIHW. (2025)

<sup>15</sup> Australian Bureau of Statistics (ABS). (2024). *National Study of Mental Health and Wellbeing, 2020-22*. ABS website accessed on 7 November 2025 at <https://www.abs.gov.au/statistics/health/mental-health/national-study-mental-health-and-wellbeing/2020-2022>.

<sup>16</sup> Barton, J., Osuagwu, U. L., Cockrell-Reed, K., & Vines, R. (2024). Factors associated with loneliness in rural Australia: A web-based cross-sectional survey. *Social Sciences & Humanities Open*, 10, 101154.

<sup>17</sup> Clark, B., Chatterjee, K., Martin, A. et al. (2020). How commuting affects subjective wellbeing. *Transportation*. 47, 2777–2805.

<sup>18</sup> Stanley, J. (2021). The school bus: An opportunity for improving rural mobility. *Journal of Transport & Health*, 24, 101308.

<sup>19</sup> Rogers, M. (2025). How "childcare deserts" in rural Australia impact parent and child health and access. *Issues in Educational Research*, 35.

entrenches gender inequality and limits children's educational outcomes, all resulting increased costs to society.<sup>20</sup>

As a result of a decline in mental and physical health from increased travel times, the RIA needs to consider the increased unpaid care needs in rural areas and the flow on cost of contributing to gender inequity. Women are predominately primary carers for children and undertake the majority of unpaid care work in rural communities.<sup>21</sup> Worsening mental and physical health increases the caring burden on these women through increasing burnout, and mental and physical health issues, as well as reducing their ability to engage in paid employment.<sup>22</sup>

Further, the increased cost of freight due to increased travel times and workforce pressures will raise food costs for all Australians, particularly for rural families.<sup>23</sup> Trucking food in remote regions already costs 'four to five times more than to urban areas'.<sup>24</sup> Women, as the predominant primary carers, will endure greater cost of living pressures, as a result of reduced default speed limits, which will be compounded as many derive incomes from agricultural business facing increased freight costs. Many of these agricultural businesses, including seafood, are price takers so will have scant options to recoup the costs. Truck drivers will have stop more due to rest requirements dictated by time and not distance, which will result in freight companies having to higher more drivers. Freight costs and the flow on effects for rural families need to be considered in the Cost Benefit Analysis.

- **Is the approach to measuring the impact of policy change appropriate? Where assumptions have been made, do you have any specific alternative assumptions that ought to have been considered?**

The above discussion of costs demonstrates how reducing default speed limits outside of built-up areas has a disproportionate impact on rural populations. The Australian Government's Office of Impact Analysis states in its Distributional Analysis Guidance Note that Cost Benefit Analysis 'can fail to account for the distribution of costs and benefits in society' and specifically lists women and people living in regional and remote areas as segments of the population when a distributional analysis is important.<sup>25</sup> The NRWC advocates for the inclusion of a distributional analysis in the RIA methodology.

## Conclusion

Rural women live on the road. They already spend hours every week travelling just to buy groceries, go to work, visit the doctor and take their children to school, as well as nearly

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<sup>20</sup> Rogers, M. (2025).

<sup>21</sup> Workplace Gender Equality Agency (WGEA). (n.d.). *Gender equality and caring*. Australian Government. WGEA website accessed on 7 November at <https://www.wgea.gov.au/gender-equality-and-caring>; WGEA. (2016). *Unpaid care work and the labour market*. Australian Government. Canberra.

<sup>22</sup> Australian Women's Health Alliance. (2023). *Re-balancing care, work and health: Policy brief*. NSW.

<sup>23</sup> Parliament of Australia. (2024). *Second interim report: Chapter 2 – Costs of food and groceries, and travel and transport*. Senate Select Committee on the Cost of Living.

<sup>24</sup> Parliament of Australia. (2024).

<sup>25</sup> Office of Impact Analysis. (2023, July). *Distributional analysis: Guidance note*. Department of the Prime Minister and Cabinet. Australian Government. Canberra

every other activity they undertake. Increasing their travel burden, without full consideration of the health, wellbeing, education and economic impacts is alarming to an already disadvantaged community who show resilience and determination in navigating their already difficult logistics.

Every rural woman the NRWC speaks to about the proposed reduction to default speed limits is passionate about the impact it will have on their everyday lives and has an example of how it will affect them. For example, the CEO of the NRWC travels 75km to the office in town four days per week, all of which is unmarked with a speed sign, until she reaches town. If the speed limit was reduced to 70km per hour, this trip would result in her driving an extra 76.8 hours per year. If you drive seven hours per day, this results in nearly 11 more days of driving per year and does not include any other travel for social events, food and essential services.

The RIA needs to consider the great and varying impact a reduction in default speed limits would have on rural women. Increased freight costs would amplify cost of living pressures for all Australians, particularly those in rural areas through elevated food and business expenses. Increased travel times for already travel burdened communities will heighten road fatigue and frustration, as well as increase mental and physical health issues. Additionally, it will further entrench gender inequality through reducing access to education, work and paid care options. Rural women's voices need to be heard in any rural policy design.