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SUBMISSION

27 October 2025

Office of Road Safety

Department of Infrastructure, Transport, Regional Development, Communications, Sport & the Arts

GPO Box 594

CANBERRA ACT 2601

Dear Sir/Madam

Re: Regulatory Impact Analysis – Reducing default speed limits outside of built-up areas

Livestock SA is the peak industry organisation for South Australia’s red meat and wool producers. Representing over 5,200 sheep producers, 2,700 beef cattle producers and several hundred goat producers across the state, we work to secure a strong and sustainable livestock industry. Supporting over 21,000 jobs, South Australia’s \$4.3 billion livestock industry is a key economic contributor to the state and the nation.

Our members operate across diverse landscapes – high rainfall parts of the state, the cropping belts, and the extensive pastoral zones and remote outback communities. Livestock SA appreciates the opportunity to provide feedback on the proposed changes outlined in the *Consultation Regulatory Impact Statement (RIS): Reducing Default Speed Limits Outside of Built-Up Areas*.

We acknowledge and support the intent of the RIS to reduce serious injuries and fatalities on rural and remote roads. Road safety is of utmost importance to our producers, their families, transporters, and employees. However, we consider that the proposed changes, as currently framed, will have unintended consequences for South Australian livestock producers and regional communities. This submission outlines our key concerns, identifies gaps in the RIS, and proposes a constructive alternative path to achieve the shared objective of safer, more resilient rural roads.

Introduction

In South Australia, livestock production occurs on over 50 per cent of the state’s landmass and occupies over 80 per cent of our agricultural land. Due to its geographic footprint, the condition of the road network, particularly the unsealed road network, has a considerable impact on the productivity and profitability of the livestock industry. The SA Red Meat and Wool Blueprint 2030 outlines the priorities for our industry¹. Government investment in the road network has a direct and material impact on industry priority areas within the pillars of ‘Our Livestock’, ‘Our Market Access’, and ‘Our People’.

¹ SA Red Meat and Wool Blueprint 2030 <https://livestocksa.com.au/industry-development/industry-blueprint>

Implications for Livestock Transport and Regional Communities

The proposal to reduce default speed limits on unsigned rural roads, particularly unsealed roads, from 100 km/h to 70-80 km/h would have the following impacts:

- **Longer Travel Times and Higher Freight Costs:** Livestock transport journeys across SA's vast outback are already time- and cost-intensive. Lower speed limits would increase total travel time and reduce efficiency, especially for producers in remote zones where unsealed roads are often the only access routes.
- **Animal Welfare Risks:** Increased journey duration, particularly on rough roads, raises animal welfare concerns. Longer time in transit elevates livestock stress, bruising, and fatigue. Delays risk breaching Land Transport Standards² and diminish meat quality due to pre-slaughter stress. Better roads, not just lower speeds, are proven to improve welfare outcomes.
- **Reduced Community Access:** Regional residents and services rely on default-speed roads for everyday access to education, healthcare, and essentials. The proposed blanket reductions may disproportionately impact people in areas already underserved by infrastructure and services.
- **Undermining Industry Viability:** By reducing the competitiveness of freight and livestock supply chains, the policy could constrain the growth of SA's livestock industry – a major contributor to state exports and rural employment.

Key Weaknesses in the RIS

While we acknowledge the safety goals of the RIS, Livestock SA highlights the following shortcomings in the analysis:

- **No Location-Specific Crash Data:** The RIS does not provide crash statistics specific to unsigned default-speed rural roads. Instead, it relies on broad national or regional proxies. This limits the capacity to target actual high-risk areas and undermines the rationale for blanket speed reductions.
- **Lack of Exposure Context:** The increase in road fatalities cited is largely in raw numbers, without fully accounting for the rise in total vehicle kilometres travelled (VKT) and population growth. In real terms, fatality rates per VKT remain broadly stable. Comparing Australia to small OECD countries provides little insight and is misleading. However, it is useful to compare ourselves with other large land mass countries, such as the US and Canada, which both have a higher fatality rate per 100,000 population than Australia at 12.17 and 4.83 respectively.
- **Omission of Road Condition and Investment Analysis:** Critically, the RIS does not consider whether poor road maintenance, narrow shoulders, or surface degradation are contributing factors in rural road trauma. Nor does it evaluate road funding levels – a major gap given the proven safety benefits of sealed and properly maintained roads.
- **Disproportionate Impact on South Australia:** SA is uniquely exposed, with more than 10,000 km of state-managed outback roads – many unsealed and in deteriorating condition. The scale and remoteness of SA's road network far exceed that of other jurisdictions, meaning these reforms would disproportionately burden our producers and communities.

² Australian Animal Welfare Standards and Guidelines—Land Transport of Livestock

- **Behavioural and Compliance Challenges:** The RIS itself acknowledges that lower speed limits on remote, open roads may face compliance issues and community resistance. Without enforcement or infrastructure investment, the change may have limited real-world effect.

Empirical Evidence: Regional Road Investment and Safety

Between 2018 and 2022, South Australia’s road maintenance backlog grew from approximately \$750 million to nearly \$2 billion. Budget allocations have not kept pace with inflation, resulting in real-term funding declines and deteriorating road infrastructure. For example, the 2025–26 state budget allocated only \$7.5 million over three years to regional road upgrades – a fraction of the identified need.

Meanwhile, crash data from SAPOL and the Bureau of Infrastructure and Transport Research Economics (BITRE) indicates that fatal crashes in regional and remote areas are not disproportionately concentrated on default-speed unsealed roads. Rather, crash clusters often occur near intersections, town fringes, or where infrastructure is substandard; e.g. narrow pavements, lack of signage.

Moreover, industry experience and scientific studies confirm that road condition, not just speed, is a key determinant of livestock welfare outcomes. Rough, unmaintained roads cause greater vibration, animal fatigue, and higher risk of injury than well-maintained sealed surfaces.

The case for increasing regional roads funding is becoming critical. It is neither equitable nor strategic for metro works to so vastly outweigh regional investment. For example, regional South Australia’s roads carry the products – livestock, grains, minerals – that generate enormous wealth for the state. Despite their importance, maintenance funding for outback roads has not kept pace with needs. A \$2 billion maintenance backlog has been identified across SA’s roads, much of it in the regions, and current budgets are grossly inadequate to address this growing deficit.

A Constructive Alternative: Strategic Infrastructure Investment

Livestock SA recommends that any efforts to reduce rural road trauma be embedded in a broader strategy of regional infrastructure reinvestment. Specifically:

- **Invest in Upgrading Key Freight Corridors:** Prioritise sealing and strengthening high-traffic livestock and other heavy industry freight routes across South Australia, especially those prone to flood closures and corrugation.
- **Target Speed Reductions Where Risk is Proven:** Use localised crash and road use data to implement signed speed reductions in clearly identified danger zones; e.g. school zones, bends, narrow bridges.
- **Increase Road Maintenance Budgets:** Lift baseline funding for outback and regional road maintenance to match rising material and labour costs, avoiding further backlog growth.
- **Link Speed Reform to Infrastructure Condition:** Tie any default speed limit reductions to a clear, funded program to improve road condition – including better signage, shoulders, and surfaces.

This approach would deliver road safety outcomes while also boosting regional productivity, community resilience, animal welfare, and economic development.

Conclusion

Livestock SA shares the goal of reducing road trauma across South Australia. However, blanket speed limit reductions on default-speed rural roads, without supporting data or investment, risk doing more harm than good in remote and agricultural regions.

We urge governments to consider a more targeted, evidence-based and investment-driven approach. Funding strategic road upgrades and maintenance will do more to enhance safety than reducing speed limits alone – and will deliver co-benefits for freight, animal welfare, regional access, and long-term economic growth.

We welcome continued consultation and engagement on developing practical, regionally appropriate road safety reforms.

Please contact the Livestock SA office on (08) 8297 2299 or via email at admin@livestocksa.com.au if you would like to discuss this submission further.

Yours sincerely

Travis Tobin
Chief Executive Officer