



Victorian Farmers Federation

The voice of Victorian farmers.

27 October 2025

Department of Infrastructure, Transport, Regional Development,
Communications, Sport and the Arts
Office of Road Safety

Submitted via 'Have your say' portal

Cc the Minister for Infrastructure, Transport, Regional Development and Local Government, via email: Catherine.King.MP@aph.gov.au

Dear Road Safety Team,

Re: Consultation Regulatory Impact Analysis (CRIA) concerning proposed reductions to default speed limits on roads outside built-up areas

Introduction

The Victorian Farmers Federation (VFF) welcomes the opportunity to comment on the Consultation Regulatory Impact Analysis (CRIA) concerning proposed reductions to default speed limits on roads outside built-up areas.

The VFF acknowledges the importance of improving road safety and shares the national ambition of reducing fatalities and serious injuries under the *National Road Safety Strategy 2021–30* and *National Road Safety Action Plan 2023–25*.

However, the VFF does not support the proposed reduction in default speed limits for rural and regional roads. While road safety must remain a priority, this proposal risks imposing significant costs on farmers, regional businesses, and communities while failing to address the underlying causes of road accidents—namely, inadequate maintenance, poor infrastructure quality, and inconsistent investment in rural roads.

The Federation is concerned that the proposal represents a policy shortcut—a “cop out” for declining investment in the maintenance and upgrading of rural roads—rather than a credible safety reform. Rural communities deserve infrastructure that is safe and fit for purpose, not lower speed limits that institutionalise underinvestment and further disadvantage regional Victorians.

VFF's Analysis of the Proposal

The Consultation RIA proposes lowering the default 100 km/h speed limit on roads outside built-up areas to between 90 km/h and 70 km/h, depending on the surface type and road

classification. These changes would affect vast stretches of Victoria's rural road network, including many arterial and local roads critical to agricultural production and freight efficiency.

Redundancy of the Proposed Regulation

The VFF notes that existing road rules already require drivers to travel at a speed appropriate to road and traffic conditions. In effect, all roads are already “speed limited” by their physical state and by driver responsibility. For example, on many rural routes—including sections of the Loddon Valley Highway—motorists routinely reduce speed due to rough surfaces, potholes, or narrow shoulders.

These behavioural adjustments demonstrate that safe driving is already regulated by conditions and vehicle type, whether a car, truck, or agricultural vehicle. Introducing a lower default limit is therefore regulatory duplication that adds complexity without delivering measurable safety benefits.

Economic and Productivity Costs

Reducing default limits would slow the movement of agricultural produce, livestock, inputs, and machinery. These are not abstract impacts: they translate directly into increased fuel use, labour hours, and transport costs.

The slowing of transport from farm to market or processor is of particular concern for perishable or time-critical commodities.

On many farming enterprises, the cumulative impact of even a small increase in travel time per trip can materially affect operating costs and business efficiency. Moreover, the agricultural freight sector already bears higher transport costs due to distance and infrastructure limitations.

Farmers also tend to sell into highly competitive domestic and export markets. There is no scope for them to pass on the costs to consumers – the farmer incurs all costs. Any further regulatory burden risks undermining farm competitiveness and regional economic performance.

As well as the direct economic impact on farmers, regional industries and towns will also be adversely affected. It will impose costs on business and industries that directly employ large numbers of people.

Farmers rely on vibrant and strong regional economies, but so do other regional workers and residents – the whole local community will be affected by reducing the default speed limit.

The Social Contract and Government Accountability

When Victorians enter a vehicle, they effectively enter into a shared agreement with other motorists and with government.

Drivers agree to follow the road rules, maintain their vehicles to roadworthy standards, and drive according to conditions. In turn, governments—local, state, and federal—carry a responsibility to provide safe, vehicle worthy and properly signed roads.

By seeking to lower default limits rather than meet this infrastructure obligation, governments risk breaching that social contract. Restricting motorists instead of maintaining roads represents a transfer of accountability—from government performance to driver behaviour—without addressing the root cause of the problem.

Regional Fairness and policy integrity

A uniform national reduction would ignore local conditions and penalise jurisdictions, like Victoria, where many rural roads already operate safely at current limits. Rural communities should not be forced to absorb the cost of a one-size-fits-all policy designed to compensate for infrastructure shortfalls elsewhere.

Rural speed management should be based on local data, engineering assessments, and community consultation, not a national default setting that undermines regional autonomy. The proposal risks further widening the fairness gap between metropolitan and regional areas.

Perverse Incentives and Long-Term Planning

The VFF is concerned that lowering default limits could create perverse incentives for governments to accept declining maintenance standards. Once limits are reduced, there is little motivation to invest in proper upgrades, since roads are no longer expected to support higher speeds.

This creates a dangerous precedent: when maintenance again falls behind, will governments respond by lowering limits further? Such a policy trajectory effectively institutionalises decline, normalising the steady downgrading of rural infrastructure rather than addressing its causes.

Sound long-term planning requires governments to maintain and rehabilitate roads to a standard that safely supports existing limits—not to reduce expectations when budgets tighten.

Evidence Limitations

The CRIA acknowledges the absence of reliable national data on vehicle kilometres travelled and fatal and serious injuries on default rural roads. The CRIA notes that:

‘... in attempting to estimate the costs and benefits of a default speed reductions, there are too many uncertainties to be able to make a firm estimate. ... the vehicle-kilometres travelled (VKT) (that is to say, the amount of driving) and the share of fatal and serious injury (FSI) crashes that occur on default roads are unknown across jurisdictions.’¹

Without these metrics, claims of “net societal benefit” are speculative. The scenario modelling used cannot substitute for evidence-based analysis grounded in actual rural road conditions.

Before any regulatory change is considered, governments must invest in improving rural road safety data and transparency to ensure decisions are evidence-based and regionally relevant.

Possibility of perverse outcomes

The VFF is concerned that reducing speed limits will lead to longer journey times and this will have implications for driver fatigue and the number of vehicles on the road. For example, a three-hour journey when driving at 100 Km/hr will become an almost four-hour journey if the limit is reduced to 70 Km/hr for the full length of the trip.

This has implications for driver fatigue, a major factor leading to accidents and deaths and injuries on our roads.

Technology and Road Quality

¹ Consultation Regulatory Impact Analysis, Reducing default speed limits outside of built-up areas, p.10.

The VFF strongly maintains that *fit-for-purpose infrastructure*—not lower speed limits—is the key to improving road safety in rural areas. Many rural accidents are linked to inadequate road width, shoulder maintenance, drainage, visibility, and surface quality. Rather than reducing speed limits, governments should commit to ensuring rural roads are maintained and upgraded to a standard that safely supports existing limits.

A strategy focused on reducing speeds risks institutionalising under-investment in regional road maintenance. This approach effectively lowers expectations of road quality and service standards for regional communities—an outcome inconsistent with fairness, productivity and long-term economic efficiency.

The VFF's Position

The VFF opposes any reduction to the current 100 km/h default speed limit on rural roads, whether sealed or unsealed. The VFF supports evidence-based safety improvements but rejects measures that impose disproportionate costs on farmers, rural industries and residents without clear, verifiable benefits.

The VFF believes that:

- Road safety improvements should be achieved through better road maintenance, design, and enforcement, not through regulatory downgrades.
- Rural speed limits must remain fit for purpose, reflecting the needs of regional freight, agricultural production, and emergency services.
- Reducing limits would entrench underinvestment and signal acceptance of substandard regional infrastructure.
- Governments must meet their responsibility to maintain, not downgrade, rural transport networks. Much of the burden for local roads falls to local governments which are chronically underfunded in many regional areas.
- The integrity of the national road system depends on government upholding its end of the social contract—providing safe, well-maintained, and clearly signed roads for lawful motorists.

Recommendations

In relation to the matters discussed in the CRIA, the VFF recommends that Governments:

- Retain the 100 km/h default speed limit for all roads outside built-up areas.
- Commit to a rural road renewal program, prioritising maintenance, shoulder sealing, and surface rehabilitation.
- Collect and publish jurisdiction-specific data on rural crashes, road conditions, and traffic volumes to underpin evidence-based safety policy.
- Ensure meaningful consultation with rural road users, freight operators, and local governments before any future regulatory proposals.
- Adopt a “fit-for-purpose” performance standard for rural roads, ensuring that infrastructure is maintained to safely support existing speed limits.
- Commonwealth and State government should increase financial assistance to local government to enable them to better maintain local roads in order to safely support a 100 Km/hr speed limit.
- Develop a long-term rural infrastructure plan that prevents the incremental downgrading of road standards and speed limits over time.

Conclusion

The VFF supports the national objective of improving road safety but rejects the premise that lowering rural default speed limits is an appropriate or effective means to achieve it. Reducing speed limits across broad geographic areas would impose tangible costs on farmers, freight operators, and regional communities, while offering uncertain benefits.

Safe driving behaviour is already enforced under existing laws requiring motorists to travel according to conditions. The missing element is not new regulation, but renewed investment and accountability for maintaining rural roads to safe standards.

The path to safer rural roads lies in investment, not downgrades. Governments must uphold their obligation to maintain infrastructure that supports safe, efficient, and productive transport for regional Australia.

The Victorian Farmers Federation therefore urges the Department and the National Transport Commission to reject all proposed reductions to rural default speed limits and reaffirm the standard 100 km/h limit as the benchmark for fit-for-purpose rural roads.

The VFF thanks the Department for the opportunity to provide input into the Consultation Regulatory Impact Analysis concerning proposed reductions to default speed limits on roads outside built-up areas. The policy contact for this matter is Glen Hepburn, Director, Economics, via e-mail ghepburn@vff.org.au.

Yours sincerely,



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