



5 June 2017

Mr Randall Fletcher
Executive Director (Transport System Management)
Department of Transport and Main Roads
GPO Box 213
Brisbane QLD 4001

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Dear Randall

OMA Submission Roadside Advertising Guide Review

1. Introduction

Thank you for inviting the Outdoor Media Association (OMA) to be part of the Roadside Advertising Consultation Group (RACG) meeting on Monday 8 May 2017. The OMA's Chief Executive Officer, Charmaine Moldrich, was pleased to attend that meeting. We also note that several of the OMA's National and Queensland based members were present.

2. Principles of Roadside Advertising

The OMA is supportive of the Department of Transport and Main Road's (TMR) 'Principles of Roadside Advertising' in that roadside advertising shall not compromise:

- road safety
- traffic efficiency
- local amenity or visual amenity
- cultural, historic, conservation and environment areas

The OMA is also supportive of the DTMR's objective to provide a transparent state-wide framework for the management of roadside advertising devices that is equitable and consistent for all third parties that wish to access road corridors. We are concerned, however, about the change of name from the '*Roadside Advertising Guide*' to '*Roadside Advertising Manual*'. This suggests that TMR may be moving towards adoption of a set of fixed technical standards, with less flexibility for any merit based decisions to apply, when assessing roadside signage applications.

3. Roadside Advertising Guide Review Project

The Roadside Advertising Guide (RAG) Review project is very important for the Outdoor industry as it impacts upon key planning and operational standards for roadside advertising across Queensland.

We understand that that the Review project will restructure the format of the RAG into four modules, as follows:

- i. Roadside Advertising Policy
- ii. Administrative Volume (used by TMR to maintain consistent streamlined administrative processes)
- iii. Assessment Volume (used by TMR to determine permitted devices and set conditions)
- iv. Technical Volume (detailing the standards and rationale behind restrictions and limits to main road safety and network efficiency)

Further, we understand that the purpose of this stage of the consultation process is to provide comments only on the following:

- Assessment Volume
- Administration Volume
- Draft contents page for new Technical Volume

The OMA's comments on the Roadside Advertising Policy were provided to TMR in December 2016 (copy attached).

TMR has advised the OMA that that the content of the Assessment Volume and Administration Volume is broadly the same as in the current RAG, but 'pulled out' into a new format. With this in mind, our comments on the Draft Administrative and Assessment Volumes follow:

4. Draft Administrative Volume

- i. Clause 2: The OMA is supportive of the purpose of the Administrative Volume. The purpose being to maintain consistent and streamlined administrative processes for TMR district Administration Officers responsible for processing the collection of roadside advertising applications. It is understood that once an application is complete the Administration Officer will forward it to an Assessment Officer who will use the Assessment Volume and Technical Volume to assess the application.
- ii. Clause 3, sentence 5: The text should be amended to read '*...further assessment...*'
- iii. Clause 5: The heading should be change from '*Content review*' to '*Document review*'. Furthermore, all references to '*Content review*' should be changed to '*Document review*', including Appendix A. This is because the term '*content*' in Outdoor advertising refers to the media image displayed on the advertising device. At the RACG meeting on 14 November 2016, TMR acknowledged that the Outdoor industry has self-regulation codes for advertising content and does not see this to be a responsibility of TMR. This is also referred to later in the Administration Volume in Clause 13.2 and also in the Assessment Volume.
- iv. Page 28: The OMA notes that there are several references within the document

to the 'commercial opportunity' of sites, including the comment on page 28, as follows:

Commercial Opportunity

The application is assessed by SPM to determine if the site and device represents a commercial opportunity for the department. If it is determined that there could be commercial interest in the site, a tender process is undertaken to achieve the best possible return for the department. If the site has limited commercial value the site is listed as non-commercial and the site is returned to the district to continue the assessment process.

The OMA requests that further information is provided by DTR on the full details and purpose of this clause. As we have some concerns with this clause, we reserve the right to pass on any additional comments on this matter at a later date.

5. Draft Assessment Volume

- i. Clause 1: It is incorrect to say that TMR "...manage roadside advertising devices..." and it should be revised to say that TMR "manage the **approvals process** for roadside advertising devices." This is because the advertising device is managed by the owner of the sign or the media display company managing that sign.
- ii. Clause 1.1, paragraph 2: This paragraph, which reads "Outdoor advertising is a glance medium..." should be deleted. This is because the wording about driver behaviour around advertising signs is not consistent with the purpose of developing the Roadside Advertising Manual. The wording of Clause 1.1, paragraph 3 and Clause 1.2 clearly addresses road safety issues around advertising signs and makes paragraph 2 redundant and unnecessary.

6. Draft Content Page for new Technical Volume

- i. The OMA has been advised that this document is the template for the new Technical Guidelines that will be drafted later this year.
- ii. The OMA reserves the right to provide full comments on the new Technical Volume, including content page, once this is drafted over the coming months.

The OMA looks forward to TMR's review of our submission and to working closely with the RACG over the coming months to ensure that regulation of roadside advertising in Queensland is clearly understood, fair and equitable for all stakeholders.

If you would like to discuss the issues raised in this letter, please contact me on 02 9357 9922 or tess.phillips@oma.org.au.

Yours sincerely



Tess Phillips
Acting Chief Executive Officer

