



28 March 2025

The Hon John Graham MP  
Minister for Transport  
52 Martin Place  
SYDNEY NSW 2000

By: Lodgement via TransportNSW Submission Portal

Dear Minister

The Returned & Services League (RSL NSW) is a member-based charity comprising some 300 sub-Branches across New South Wales, providing support to veterans, and their families – and advocating for improved public policy outcomes.

The League seeks to work collaboratively and cooperatively with the NSW and Commonwealth Governments to advance issues raised by RSL NSW members. It's important to note RSL NSW does not profit from gaming or the sale or provision of alcohol in RSL and Service Clubs.

RSL NSW is a strong advocate for the continuation of local, community-based ANZAC Day and Remembrance Day services across the state, which are generally delivered by our sub-Branches.

However, it's becoming increasingly apparent the costs and administrative burden associated with the government permits and licencing required to put on these important commemorative events are weighing heavily on our sub-Branches. In many cases, sub-Branches are being forced to foot the bill for temporary local road closures, traffic management and crowd control measures.

I am sure you would agree that Anzac Day and Remembrance Day are two of the most important days on the Australian calendar. They provide Australians the opportunity to reflect on the unique sacrifices the men and women of our navy, army and air force, and their families, have made in service of our nation in war and peacetime.

We therefore believe it's highly inappropriate that a charitable organisation whose primary purpose is to provide support services to veterans in need is asked to divert funding to pay for road closures and traffic management.

RSL NSW believes that a Memorandum of Understanding (MOU) entered into by RSL NSW, the City of Sydney and the NSW Government provides clear delegated responsibility to each party to ensure the smooth operation of Anzac Day and other commemorative events in central Sydney.



Ideally, we would like to see our sub-Branches state-wide enter into similar agreements with their local councils and NSW Government agencies to ensure they can continue to deliver ANZAC Day and Remembrance Day events with minimal or no associated costs or administrative burden.

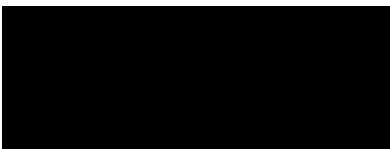
To ensure the continued delivery of these important community-based events, particularly in suburban, regional and rural areas, RSL NSW kindly asks the NSW Government for its assistance in developing a standardised MoU that can be used by sub-Branches, local council and NSW Government agencies to provide clarity around the roles and responsibilities of all parties – and to reduce as much as possible the administrative and financial burden on our volunteer-run sub-Branches.

RSL NSW is tremendously grateful to the NSW Government, NSW Police Force, local councils and other community organisations that have worked in close partnership with our sub-Branches to provide Australians the opportunity to remember the sacrifice of our veterans, and their families, in cities and towns across New South Wales.

We stand ready and willing to work with the NSW Government to ensure our sub-Branches can continue to deliver ANZAC Day and Remembrance Day events across NSW long into the future.

If you would like to discuss this matter further, please contact Troy Deighton, Head of Government Relations and Corporate Affairs, via email: [tdeighton@rslnsw.org.au](mailto:tdeighton@rslnsw.org.au).

Yours sincerely



**Isaac Ohlin**  
RSL NSW General Manager, Policy & Services



**RSL**  
**NSW**

## ***RSL NSW Submission to the Roads Act 1993 Review***

Traffic management associated with ANZAC Day  
and other commemorative events.



## CONTACT DETAILS

The contact details for the relevant team at RSL NSW are:

Isaac Ohlin – General Manager, Policy and Services

Email: [iohlin@rslnsw.org.au](mailto:iohlin@rslnsw.org.au)

Phone: 0499 441 291

Postal: PO Box 30, Campbell ACT 2612

Troy Deighton – Head of Government Relations and Corporate Affairs

Email: [tdeighton@rslnsw.org.au](mailto:tdeighton@rslnsw.org.au)

Phone: 0475 193 983

Postal: PO Box 30, Campbell ACT 2612

Ethaniel Corfield-Thompson

Email: [ethompson@rslnsw.org.au](mailto:ethompson@rslnsw.org.au)

Phone: 0413 184 039

Postal: PO Box 30, Campbell ACT 2612

## ABOUT RSL NSW

RSL NSW is the largest ex-service organisation (ESO) and leading voice for veterans, and their families, in New South Wales, with some 300 sub-Branches and more than 30,000 members state-wide. RSL NSW works closely and collaboratively with the Commonwealth and NSW Governments, other ESOs, community groups and our members to represent veterans and their families.

RSL NSW also seeks to improve community engagement through acknowledgment of service by organising, hosting and delivering on services such as ANZAC Day and Remembrance Day. As part its Charitable Purpose, RSL NSW aims to improve social connection between current and former-serving ADF personnel, and their families, whilst also advocating for improved public policy outcomes.

This submission has been guided by the Terms of Reference directing the *Roads Act 1993* Issue Paper with a specific focus on more contemporary uses for roads and streets that are safe and responsive to community needs; faster local decision making with appropriate mitigations to manage network risk and; a streamlined statute that keeps pace with change.

RSL NSW thanks the Department for extending this opportunity to make a submission, and does so on behalf of RSL NSW Giles Hurst, and RSL NSW President Mick Bainbridge.

RSL NSW wishes to note that it does not own or operate registered clubs, nor does RSL NSW benefit from proceeds arising from the sale of alcohol or gambling.

This submission will also highlight the Memorandum of Understanding entered into and agreed upon by the City of Sydney (City), the State of New South Wales (State); and the Returned and Services League (RSL NSW) and will only reference terms which are in the public domain, and not those which have been agreed upon as confidential.

## **CONTEMPORARY USES FOR ROADS AND STREETS THAT ARE SAFE AND RESPONSIVE TO COMMUNITY NEEDS**

Roads and streets are fundamental in promoting and fostering economic prosperity, efficient and safe travel, and community connection. The *Roads Act*<sup>1</sup> establishes the rights of members of the public to pass along public roads<sup>2</sup>; the procedures for opening and closing of a public road<sup>3</sup>; and to regulate the carrying out of various activities on public roads.<sup>4</sup>

The Memorandum of Understanding entered by RSL NSW, the City and the State provides a commitment between the parties to cooperate in the organisation, staging and delivery of ANZAC Day and Remembrance Day services.

These services have been acknowledged by all parties as significant events as part of the veteran landscape, and an appropriate way to commemorate and acknowledge ANZAC Day in Sydney. Whilst the NSW Government recognises the need to improve the contemporary use of roads, the Memorandum of Understanding highlights that contemporary measures have been taken to improve the safety of the event, with the City contributing up to:

*'one third of the actual cost, up to a maximum of \$70,000 (excluding GST), annually, towards the Hostile Vehicle Mitigation of ANZAC Day for the 2024 and 2025 events.'*<sup>5</sup>

As we continue to remember, reflect and recognise the service of our defence personnel, RSL NSW understands that there must be contemporary consideration to our changing city, and the ongoing development of infrastructure which has continued to evolve since our first commemoration on 25 April 1916.

RSL NSW suggests that a state-wide MOU be entered into between RSL NSW, the State and councils, county councils, administrators or any other name as outlined in the *Local Government Act*<sup>6</sup> to ensure contemporary measures can be undertaken, to acknowledge historically significant and enduring services that are fundamental to many communities across the State.

---

<sup>1</sup> *Roads Act 1993* (Cth).

<sup>2</sup> *Ibid*, s 3(a).

<sup>3</sup> *Ibid*, s 3(c).

<sup>4</sup> *Ibid*, s 3(h).

<sup>5</sup> ANZAC Day 2024-2025 (File No. X084995) between The City of Sydney, The State of New South Wales, The Returned and Services League of Australia (NSW Branch) 04 December 2023 (Memorandum of Understanding)

<sup>6</sup> *Local Government Act 1993* (Cth).



## **FASTER LOCAL DECISION-MAKING WITH APPROPRIATE MITIGATIONS TO MANAGE NETWORK RISK**

RSL NSW acknowledges the complexities of road closures and event management and seeks to ensure that ANZAC Day can be commemorated across all communities state-wide to appropriately reflect and recognise the contributions made by veterans and their families.

Local decision-making often takes time and resources which may delay final determination on any proposed closure. RSL NSW agrees that appropriate mitigations are undertaken to manage network risk.

RSL NSW understands that in the contemporary climate, significant resources must be deployed to minimise any harm from protests or threats which may impact the safety and delivery of these events. RSL NSW has previously sought an exemption to be made for State Emergency Services (SES) to manage road closures for the purposes of ANZAC Day and Remembrance Day services and continues to advocate for such reform.

Whilst RSL NSW is cognisant of s 36 of the *Roads Act* allowing 'any person to make submissions to the Minister with respect to the closing of the road' this is a burdensome requirement for many sub-Branches which may be unable to dedicate time to such submissions. It is noted that SafeWork NSW now approves Registered Training Organisations to ensure training and compliance with procedures for road closures. This is an additional administrative requirement for sub-Branches to comply with that may detract from their capacity to provide local on-the-ground support to veterans and their families.

In some cases, RSL NSW has been advised that sub-Branches have sought NSW Police assistance.

RSL NSW is cognisant of previous concerns raised by sub-Branches, with Bega, Tathra, Bemboka and Cobargo being faced with \$12,000 bill from a traffic management company for closures and permits, which were an additional cost to sub-Branches.

After successful advocacy and negotiations, Bega Valley Shire 'provided compliant traffic guidance schemes (TGS) pro-bono for the RSL sub-Branches for ANZAC Day, and if requested, will provide the equipment to implement the TGSs, such as barriers and signs.'

RSL NSW recommends that an ongoing and reviewable MOU entered into by RSL NSW, and councils across the State would greatly assist in faster local decision making, with the MOU to outline responsibilities, structures and financial contributions without the need to engage in negotiations each year, and instead limit such discussions to every two or three years.

## **STREAMLINED STATUTE RECOGNISING CHANGE**

As the Government has acknowledged, roads, streets and other public spaces have evolved, and the Act must continue to be ready and responsive to change and address future challenges.

As it stands, the *Roads Act* requires significant reform to better equip the State to deal with changing infrastructure, increased population growth and the ongoing concerns with event planning, management and risk mitigation.

RSL NSW proposes that a provision contained within the *Roads Act*, or a notice in the Gazette, could highlight the Government's ongoing support for yearly road closures to allow community reflection, recognition and observance of ANZAC Day and Remembrance Day services.

Work, Health and Safety legislation requires all PCBU's (Persons Conducting a Business or Undertaking) working on traffic control, traffic control plans or road closures to seek approval for licensing through Registered Training Organisations that have an agreement with SafeWork NSW. For Sub-Branches, ensuring adequate road traffic management strategies, permits, licensing and associated fees has been identified as an additional burden.

RSL NSW notes that an MOU between RSL NSW and Local Councils, assisted by the NSW Government, to promote ANZAC Day services, road closures and the ongoing need for planning would promote guiding principles for Councils through the *Local Government Act* that encourages:

*'Councils [to] work co-operatively with other councils and the State government to achieve desired outcomes for the local community.'*<sup>8</sup>

RSL NSW seeks the enactment of provisions to ensure state-wide streamlining of processes required for road closures and associated management of ANZAC Day and Remembrance Day services.

---

<sup>7</sup> ABC News, *RSL sub-Branches in NSW slapped with bill for ANZAC Day parade traffic control* (Article, 22 April 2022), < <https://amp.abc.net.au/article/101003270> >.

<sup>8</sup> *Local Government Act 1993* (NSW), s 8A(e).



## RECOMMENDATIONS



1. Develop a standardised Memorandum of Understanding that can be used by RSL NSW sub-Branches and Local Councils with the assistance of the State Government to ensure that RSL sub-Branches are able to organise, stage and deliver ANZAC Day and Remembrance Day services and formalise responsibilities of each party.



2. Encourage streamlined processes which minimise administrative burdens on RSL sub-Branches in relation to road closures, including the use of the State Emergency Service (SES) for temporary road closures and traffic management, as appropriate, in line with the *State Emergency and Rescue Management Act*.



3. Ensure the costs relating to road closures, traffic management plans, and crowd control measures are not absorbed by sub-Branches or other charitable organisations to ensure their funds can be used to provide much-needed veteran support services.



4. Provide exemptions to State Emergency Services to act as traffic managers and traffic control units to help assist in the organisation, delivery and staging of ANZAC Day and Remembrance Day services.