Reforms of the Disability Standards for Accessible Public Transport 2002

Joint Submission to Stage 2 Consultation Regulation Impact Statement

August 2022

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About AFDO

Since 2003, the Australian Federation of Disability Organisations (AFDO), a Disabled People's Organisation (DPO) and Disability Representative Organisation (DRO), has been the recognised national peak organisation in the disability sector, along with its disability specific members, representing people with disability. AFDO's mission is to champion the rights of people with disability in Australia and support them to participate fully in Australian life.

Our member organisations represent disability specific communities with a total reach of over 3.8 million Australians.

AFDO continues to provide a strong, trusted, independent voice for the disability sector on national policy, inquiries, submissions, systemic advocacy and advisory on government initiatives with the Federal and State/Territory governments.

We work to develop a community where people with disability can participate in all aspects of social, economic, political and cultural life. This includes genuine participation in mainstream community life, the development of respectful and valued relationships, social and economic participation, and the opportunity to contribute as valued citizens.

Our vision

That all people with disabilities must be involved equally in all aspects of social, economic, political and cultural life.

Our mission

Using the strength of our membership-based organisations to harness the collective power of uniting people with disability to change society into a community where everyone is equal.

Our strategic objectives

To represent the united voice of our members and people with disability in national initiatives and policy debate.

To enhance the profile, respect and reputation for AFDO through our members.

To build the capacity and sustainability of AFDO and our members.

To foster strong collaboration and engagement between our members and stakeholders.

To enhance AFDO's connection and influence in international disability initiatives, particularly in the Asia Pacific region, through policy, advocacy and engagement.

Our members

Full members:
- Arts Access Australia
- Autism Aspergers Advocacy Australia
- Blind Citizens Australia
- Brain Injury Australia
- Deaf Australia
- Deafblind Australia
- Deafness Forum of Australia
- Down Syndrome Australia
- Disability Advocacy Network Australia
- Disability Justice Australia
- Disability Resources Centre
- Enhanced Lifestyles
- National Mental Health Consumer and Carer Forum (NMHCCF)
- People with Disability WA
- People with Disabilities ACT
- Polio Australia
- Physical Disability Australia
- Women with Disabilities Victoria
- Women with Disabilities ACT

Associate members:
- AED Legal Centre
- All Means All
- Amaze
- Aspergers Victoria
- Disability Advocacy and Complaints Service of South Australia (DACSSA)
- Disability Law Queensland
- Leadership Plus
- National Organisation for Fetal Alcohol Spectrum Disorder (NOFASD)
- Star Victoria
- TASC National Limited
- YDAS – Youth Disability Advocacy Service

About NITAN

The National Inclusive Transport Advocacy Network (NITAN) represents a national voice of people with disability advocating for accessible and inclusive public transport systems across Australia.

http://www.nitan.org.au/

Background

NITAN was established and is under the auspice of the Australian Federation of Disability Organisations (AFDO). However, NITAN operates independently; it is an unfunded group of people who share a specific interest in public transport matters.

Members

NITAN was established with a core working group of members from the following organisations:

- All Aboard Network
- Australian Federation of Disability Organisations
- Council for Intellectual Disability
- Disability Justice Australia
- Disability Resources Centre
- First Peoples Disability Network
- Inclusion Moves
- National Ethnic Disability Alliance
- People with Disability Australia
- Physical Disability Council of NSW
- Victorian Legal Aid

NITAN has since grown to also be supported by other state-based advocacy organisations and individuals with expertise in legal, transport, and disability rights. Our focus is unashamedly on disabled people having access to the same transport options as the wider community, spanning the full spectrum from active transport to public transport and the ability to self-drive.

Purpose

We aim to be a voice of people with disability on transport matters; however, we recognise the disability community is made up of a diverse range of people with differing needs and priorities. We understand that to be effective, we need to engage with experts in their field. We are open to ideas on how this can occur and look forward to shaping our voice with the disabled communities' assistance.

Our Objectives:

1. Community Inclusion

   Promote the ethos that full, equal community integration of people with disability is not possible without a completely accessible 'whole of journey' public transport system Australia-wide, and advocate this position to all governments, industry, and community stakeholders.

2. Influence

   Ensure that the voices of people with disability are heard in the design and shaping of public transport systems across Australia and in their day-to-day operations. Support others with requisite experience and qualifications as they advocate on public transport issues encompassing a "nothing about us without us" approach.

3. Alliances

   Build a strong network of allies and rally the many voices of people with disability to speak as one national voice.

What does NITAN do?

NITAN aligns itself fully with the goals of Australia's Disability Strategy.

We provide a national voice and connection for people with disability and associated organisations that advocate for accessible and inclusive transport.

We work to educate people with disability on their transport rights. We also raise awareness of public transport issues facing people with disability.

We make sure that state and territory-based transport advocacy groups can feed into a national advocacy network that is independent and non-partisan.

Acknowledgements

AFDO and NITAN acknowledge Aboriginal and Torres Strait Islander people as the traditional custodians of the land on which we stand, recognising their continuing connection to land, waters, and community. From our head office in Melbourne, we pay our respects to the Bunurong Boon Wurrung and Wurundjeri Woi Wurrung peoples of the Eastern Kulin Nation and to their Elders past, present, and emerging. We also pay our respects to the traditional owners of all lands on which we operate or meet around the country.

AFDO and NITAN acknowledge people with disability, particularly those individuals that have experienced or are continuing to experience violence, abuse, neglect, and exploitation. We also acknowledge their families, supporters, and representative organisations and express our thanks for the continuing work we all do in their support.

This Submission has been compiled by the National Inclusive Transport Advocacy Network (NITAN) with the assistance of the Australian Federation of Disability Organisations (AFDO).

In addition, AFDO and NITAN fully endorse the Submission provided by the Public Interest Advocacy Centre (PIAC) and would refer the reader there for further explication of the issues raised within this document.

Executive Summary

AFDO and NITAN thank the Department of Infrastructure, Transport, Regional Development, Communication and the Arts for the opportunity to provide our submission to the review of the Disability Standards for Accessible Public Transport 2002 (DSAPT; the Standards). It is the position of AFDO and NITAN that access to a full range of safe and accessible public transport is a significant enabler of social inclusion. Accessible public transport is a necessity of life and provides the opportunity for equal participation of people with disability in society.

With this in mind, AFDO and NITAN are of the view that the regulatory options contained within the document "*Reforms of the Disability Standards for Accessible Public Transport 2002 Stage 2 Consultation Regulation Impact Statement – March 22'* are required to ensure a full range of safe, equitable public transport. This includes the provision of reporting and compliance mechanisms.

We have both invested heavily in the full DSAPT process, including participating in the consultations and taskforce, for the collective good of the disabled community. From these experiences, several important lessons have been learned, the most important being that we should and must consult with people with disability. It is critical that we maintain the principal of "nothing about us, without us", and continue to improve our methods of consultation and co-production. There are a number of issues still outstanding regarding implementation, decisions around compliance frameworks, and other matters. Discussion of these issues must include the disabled community and be publicly transparent.

It is our view that the regulatory mechanism is the only option that ensures compliance with the Standards and enables all stakeholders to be able to report effectively and move forward from the current situation. Furthermore, the regulatory option provides security for all stakeholders in terms of delivery of the Standards.

We endorse the regulatory options. Where different options have been provided, AFDO and NITAN have provided comment noting our preferred option within the regulatory framework.

Response to Stage 2 Reform Areas

Table 1: Summary of Stage 2 reform areas

1. Reporting	There are no requirements to report data on compliance within the Transport Standards and no nationally consistent compliance data currently exists. Without a nationally consistent reporting framework the lack of data to monitor compliance will continue. **Option: Regulatory** **Response:** In relation to the options raised, NITAN is of the view that option 2 is required.
2. Equivalent access	Public transport operators and providers may be reluctant to use equivalent access provisions—while they provide the flexibility to use innovative solutions to achieve an equivalent level of accessibility, operators don't have certainty the solution complies with the Transport Standards. Reviewing the current provisions aims to provide the assurance and flexibility to develop solutions that are fit for purpose and non-discriminatory. **Option: Regulatory** **Response:** NITAN's view is that the peer review process needs to be independent. The reviewer should be a person with an understanding of the access issues and be a person with a disability.
3. Rideshare	The Transport Standards are not clear whether rideshare is covered, leading to ambiguity in the obligations of rideshare providers. There is an opportunity to clearly define public transport services and conveyances so all forms of public transport are identified, and the obligations and responsibilities of operators and providers are made explicit in relation to the provision of public transport services. **Option: Regulatory**

4.	Dedicated school buses	Dedicated school bus services are exempt from certain physical access requirements in the Transport Standards, which may impact public transport accessibility for students with disability and their parents and carers. There is an opportunity to ensure discrimination against students with disability does not occur by amending or removing exemptions for dedicated school bus services. **Option: Regulatory** **Response:** NITAN is of the view that option 1, removal of the school bus exemption is appropriate. There should not be a distinction between a school bus and a 'regular' bus service.
5.	Better communication of accessibility features	There is no national consistency on the definition of accessibility and what accessibility amenities and features are available. This leads to accessibility meaning different things to a wide range of people, depending on their individual needs. There is an opportunity to develop nationally consistent terminology that can be applied across all modes of public transport, and a baseline list of accessible features. **Option: Regulatory**
6.	Timely provision of information	There is no requirement for accessible public transport information to be provided in a preferred format and in a timely manner. Timely and accessible information ensures people with disability have confidence to use public transport. There is an opportunity to clarify the requirements concerning the provision of accessible public transport information when a request is made for information in a preferred format. **Option: Regulatory** **Response:** NITAN is of the view that, whilst options listed in terms of guidance are technology based, it should be noted that face-to-face customer service should not be excluded. Furthermore, the term 'timely manner' lacks clarity, and more information should be given as to what timeframe it encompasses.

7.	Real time communication	There is no requirement for real time communication between operators and providers and people with disability. This leads to situations where passengers may not be able to communicate with staff or exchange information in real time. There is an opportunity to improve communication by including real time communication requirements.
		Option: Regulatory
		Response: It is imperative that real time information be available in all formats, not just technology based.
8.	Passenger location during journey	Arrival and next stop information is not always available or accessible to people with disability using public transport. There is an opportunity to ensure all public transport users are given access to the same level of information on their location during their journey, specifically arrival and next stop information.
		Option: Regulatory
		Response: NITAN is of the view that sub-option 2 is the preferred method. This enables greater inclusion and in instances where people with disability are facing away from the driver, they will have the opportunity to view and hear information about the next stop.
9.	Hearing augmentation on conveyances	Provisions in the Transport Standards do not provide equitable access to information to people who are Deaf or who use hearing aids and are on-board conveyances. Passengers with hearing impairments may be unable to see a visual display or miss or misunderstand system messages. There is an opportunity to provide improved hearing augmentation systems that cover a greater area of the interior space of a conveyance.
		Option: Regulatory
		Response: NITAN is of the view that Option 1 is preferred, with sub-option 2.

10. Print size and format	Existing requirements for large print are not best practice and do not meet the varying needs of people with low vision or other print disabilities. There is an opportunity to include specific font weight and text justification requirements for larger print where the legibility of products and services can be improved by increasing the size of the letters and layout of materials. **Option: Regulatory**
11. International symbol for access and deafness	The current reference is to an old Australian Standard. There is an opportunity to update and align requirements with contemporary Australian Standards for the provision of international symbols and lettering sizes for accessibility and Deafness. **Option: Regulatory** **Response:** NITAN is of the view that option 2 is preferred.
12. Letter heights and luminance contrast of signs	The Transport Standards lack clarity regarding font type and luminance contrast, and do not provide certainty that signage design will be consistent and accessible to people with disability. There is an opportunity to simplify and clarify requirements concerning letter heights and luminance contrast of static, non-braille or non-tactile signs. **Option: Regulatory** **Response:** NITAN is of the view is that Option 1 is preferred.
13. Location of signs	The reference to the Australian Standard is over 30 years old. While there is no evidence to suggest the requirements are not fit for purpose, there is an opportunity to update and simplify the requirements for signage location on conveyances and infrastructure and in premises to assist operators and providers in meeting their obligations to provide accessible public transport services. **Option: Regulatory** **Response:** NITAN is of the view that Option 1 is preferred.

14. Braille specifications	There is a lack of clarity on the standard of braille required for use in the provision of public transport information to people with vision impairment presents challenges to braille readers. There is an opportunity to clearly specify the requirement for use of braille, raised lettering or symbols. **Option: Regulatory**
15. Braille and tactile lettering for signage	The Transport Standards contain inconsistent braille requirements and this presents challenges to braille readers. There is an opportunity to clearly define the braille and tactile signage requirements and design standards to reflect braille best practice and align these with related requirements under the Premises Standards. **Option: Regulatory**
16. Hearing augmentation: infrastructure and premises	There is a reference to a dated standard on hearing augmentation in infrastructure and premises that is inferior to the requirements of the Premises Standards. There is an opportunity to improve the provision of hearing augmentation systems in premises and infrastructure, in line with the Premises Standards. **Option: Regulatory** **Response:** NITAN is of the view that Option 1 is preferred.
17. Lifts: Braille and tactile information at lift landings	There is inadequate provision of wayfinding information at lift landings which presents a barrier to independent travel for people with vision impairment and / or hearing impairment. There is an opportunity to ensure that people with disability can continue their journey by providing braille and tactile wayfinding information on lift landings and door frames. **Option: Regulatory**

18. Lifts: Audible wayfinding	People with vision or cognitive impairments are sometimes uncertain about which landing a lift car has arrived at and / or which way they need go to continue their journey. There is an opportunity to enhance lift accessibility by ensuring that audio announcements are provided at all lift levels and that directional audible wayfinding information is available at lift landings. **Option: Regulatory** **Response:** NITAN is of the view that Option 1 is preferred
19. Lifts: Emergency communication systems in lift cars	People who are Deaf, hard of hearing, speech impaired or non-verbal are at risk of being unable to communicate the need for assistance during an emergency. There is an opportunity to enhance lift accessibility through the provision of adequate emergency communications systems in lift cars. **Option: Regulatory**
20. Lifts: Reference for lift car communication and information systems	People who are hard of hearing—and particularly those who also have vision impairments—do not always receive equal access to information while travelling in lift cars when compared to other passengers. There is an opportunity to provide assistive listening systems in lifts and update technical references that deal with assistive listening systems to take into account technological advances. **Option: Regulatory**
21. Information and communication technologies (ICT) procurement	There are no technical requirements for ICT procurement, and existing measures to ensure procurement of accessible ICT products do not support best practice. There is an opportunity to establish a national minimum standard to ensure that websites, software and digital services meet the same level of consistency and provide a framework for developing and procuring a wide range of accessible ICT applications, products and services. **Option: Regulatory** **Response:** NITAN is of the view that Option 5 is preferred. This ensures that this standard is inclusive for the Deaf community.

22. Mobile web systems	Transport operators and service providers are increasingly using online systems such as applications (apps) and websites on mobile phone and tablet devices to communicate customer service information, however there are no minimum accessibility requirements for mobile web systems. There is an opportunity to ensure a minimum standard level of accessible information is available to passengers through mobile web systems.
	Option: Regulatory
	Response: NITAN is of the view that option 1 is preferred.
23. Accessible fare system elements	The Transport Standards do not adequately cover or support existing or future technologies used in fare payment and validation. As a result, current fare system requirements are not fit-for-purpose and customers with disabilities may be exposed to inaccessible or inconsistent fare systems. There is an opportunity to ensure that accessibility requirements for fare payment and validation systems are reflective of existing and future digital technologies and ensure that accessible fare payment options are equal in cost with other options.
	Option: Regulatory
	Response: NITAN is of the view that Option 3 with sub-option 2 is preferred.
24. Doors on access paths	Manual doors on access paths can be challenging for people with disability and their companions to use, creating a barrier for independent access to public transport. There is an opportunity to ensure people with disability and their companions do not encounter doors on access paths that present a barrier to entry, which other passengers would not encounter.
	Option: Regulatory
25. Continuous accessibility on access paths	The requirements for continuous accessibility reference a dated standard, and are not aligned with the Premises Standards. There is an opportunity to provide standalone requirements for continuous accessibility on access paths that are more closely aligned with the Premises Standards, whilst maintaining the rights of people with disability.
	Option: Regulatory

26. Flange Gaps	Flange gaps on access paths present a safety risk to the safe passage of people with disability, however there is a lack of certainty for operators and providers on their compliance obligations. There is an opportunity to recognise flange gaps within access paths at level crossings on train, light rail, and tram networks, ensuring the gap is safe for people with disability.
	Option: Regulatory
	Response: NITAN is of the view that Option 1 is preferred. NITAN maintains the view that any research conducted regarding flange gaps must have a completion date.
27. Resting points	There are no requirements to provide an allocated space for a wheelchair or similar mobility aid at a resting point, inhibiting the ability of people who use mobility aids to rest along access paths. There is an opportunity to ensure resting points are available for people who use mobility aids by providing an allocated space.
	Option: Regulatory
28. Requirement for handrails in overbridges and subways	Many overbridges and subways do not have continuous handrails, creating a barrier to using public transport for people who use handrails for wayfinding support. There is an opportunity to ensure that all passengers have continuous access to stair and ramp handrails in overbridges and subways.
	Option: Regulatory
29. Location of Fare System Elements	There is limited clarity regarding the specific location of fare system elements, which may lead to an inconsistent and potentially inaccessible travel experience that prevents some people travelling independently. There is an opportunity to clarify the accessibility requirements for the location of fare system elements by simplifying and co-locating these requirements in a new section.
	Option: Regulatory

30. Allocated Spaces and priority seating in waiting areas	The Transport Standards do not provide sufficient clarity on the proportion of allocated spaces and priority seating required in a waiting area that provides seats. This may lead to the proportion of allocated spaces and priority seating provided in each waiting area to be insufficient. There is an opportunity to provide clarity on the proportion of allocated spaces and priority seating required in a waiting area and specifically address uncertainty on how a single bench seat should be designated as priority, and to clarify the nature and extent of a waiting area. **Option: Regulatory**
31. Accessible toilets with equal proportion of left- and right-hand configurations	Accessible toilets are not always provided in equal proportion of left- and right-hand design, leaving some people with disability unable to use them. There is an opportunity to provide accessible toilets on conveyances with an equal or near equal proportion of left- and right-hand configurations to ensure people can choose an accessible toilet design that is best suited to their needs. **Option: Regulatory**
32. Emergency call buttons in accessible toilets	If emergency call buttons are installed in accessible toilets at currently compliant heights (greater than 900 millimetres above floor), they are not reachable by a passenger who has fallen to the floor. There is an opportunity to provide emergency call buttons in unisex accessible toilets at split level to ensure the buttons can be used by a person standing or sitting, or a person collapsed on the floor. **Option: Regulatory** **Response:** NITAN is of the view that Option 1 is preferred.
33. Ambulant toilets	There is no requirement for the provision of ambulant toilets, which may present a barrier to people with ambulant disabilities in using public transport. There is an opportunity to ensure that toilets are provided for people with ambulant disabilities and to align ambulant toilet requirements with the Premises Standards. **Option: Regulatory**

34. Lift specifications and enhancements	The existing lift accessibility requirements reference a dated standard that does not take into account technological advances in accessibility features that are increasingly being installed as standard practice. There is an opportunity to update the referenced standard to reflect technological advances and improvements in lift specifications and enhancements. **Option: Regulatory**
35. Specifications for escalators and inclined travelators	Escalators and inclined travelators are not always wide enough to be accessible to people with disability. There is an opportunity to clarify the technical specifications regarding the minimum unobstructed width for escalators and inclined travelators to promote safe and accessible egress and provide certainty to operators and providers on their obligations. **Option: Regulatory**
36. Poles, objects and luminance contrast	There is no specified point of reference for measuring or calculating luminance contrast in the Transport Standards. There is an opportunity to include a reference to the Australian Standards that provides a methodology for measuring and calculating luminance contrast and to identify surfaces that require sufficient luminance contrast with objects, in alignment with the Premises Standards. **Option: Regulatory** **Response:** NITAN is of the view that sub-option 2 is preferred.
37. Lighting	The Transport Standards requirements for lighting do not provide adequate guidance for lighting designers to deliver appropriate lighting solutions. Effective and functional lighting is critical to ensuring safe, comfortable and accessible journeys for all passengers. There is an opportunity to update lighting requirements to ensure public transport environments deliver effective and functional lighting solutions that are appropriate for the diverse and nuanced requirements of people with disability, while meeting the unique safety, contextual and operational requirements appropriate to their context. **Option: Regulatory** **Response:** NITAN is of the view that Option 3 is preferred.

38.	Signals and process for requesting boarding devices	Existing requirements for signals or other processes for requesting boarding assistance are not sufficiently explicit and the reference to the Australian Standard is dated. People who are hearing impaired or deaf are at a disadvantage when communication systems require verbal interaction. There is an opportunity to clarify the requirements for signals and other processes for requesting boarding assistance, and to update the reference to Australian Standards to reflect the use of modern technology. **Option: Regulatory** **Response:** NITAN is of the view that Option 1 is preferred.
39.	Notification by passenger of need for boarding device	There is no requirement specified for advanced notice or booking for passengers needing access to a boarding device, and the requirements for passengers requesting boarding devices at infrastructure and in premises are conflated with the requirements relating to on board conveyances. There is an opportunity to clarify the need for passengers to have flexible options when notifying operators and providers of a need for a boarding device and update the Australian Standards reference to reflect the use of modern technology. **Option: Regulatory** **Response:** NITAN is of the view that sub-Option 1, and with respect to call and control buttons, sub-Option 2, is the preferred method.
40.	Portable boarding ramp edge barriers	There is an absence of a clear requirement for portable boarding ramps to have edge barriers, which poses a risk to the safety and confidence of people who use mobility aids when travelling on public transport. There is an opportunity to provide a clear requirement for all portable boarding ramps to have edge barriers. **Option: Regulatory** **Response:** NITAN is of the view that Option 3 is the preferred method.

41. Boarding ramp and removable gangway definitions	Vehicle boarding ramps are operated in a static onshore environment and removable gangways for vessels are operated in a dynamic marine environment, however they do not have distinct accessibility requirements. There is an opportunity to clearly differentiate between vehicle boarding ramps and removable gangways to reflect the distinction between these operating environments. **Option: Regulatory**
42. Removable gangway design—ferries	As there is currently no differentiation between vehicle boarding ramps and removable gangways for vessels, the specifications for gangway design are not fit for purpose and do not reflect a dynamic operating marine environment. There is an opportunity to provide clarity for public transport operators and providers on the design specifications for removable gangways. **Option: Regulatory**
43. Nominated assistance boarding points	It can be difficult for people with disability to know where to seek direct boarding assistance, and public transport staff may experience trouble locating people with disability when they require direct assistance. There is an opportunity to provide clarity about where and how customers with disability can seek timely boarding assistance, provision of a boarding ramp and direction to accessible facilities. **Option: Regulatory** **Response:** NITAN is of the view that Option 1 is preferred, however more work is required in terms of clarifying the definition of what is an accessible door.
44. Mobility boarding points— identification of lead stops	Poorly identified lead stops create challenges for people with disability in service recognition, moving to the appropriate location on the platform and hailing the driver. There is an opportunity to provide technical specifications for the identification of lead stops to ensure people with disability can identify these at bus stations, bus interchanges and in bus zones. **Option: Regulatory**

45. Pontoon boarding points on infrastructure	Boarding points are required to have a firm and level surface where boarding devices can be deployed, however there is uncertainty on the definition of firm and level in relation to pontoon boarding points as these are affected by wash, wave and wind action. There is an opportunity to acknowledge that pontoons are located in a dynamic marine environment, and their design must allow for maximum stability to ensure people with disability can board and alight ferries safely. **Option: Regulatory**
46. Bus, tram and light rail boarding points on infrastructure	Large gradient and cross fall changes between bus stops and roads can reduce accessibility for people with disability, and make boarding and alighting from conveyances unsafe. There is an opportunity to ensure that wherever possible, boarding points on buses, light rail and trams are made accessible by including clear gradient and cross fall specifications. **Option: Regulatory** **Response:** NITAN is the view that Option 2 is the preferred method.
47. Hail-and-ride boarding points on infrastructure	People with disability may be unable to access hail-and-ride services due to a lack of accessible boarding points for these services. There is an opportunity to ensure that hail-and-ride services offer maximum opportunity for people with disability to board and alight and ensure that accessible hail-and-ride pick up locations can be clearly identified and understood as accessible. **Option: Regulatory**
48. Accessible taxi ranks	There are no specific requirements for accessible taxi ranks, which creates challenges for people who use wheelchairs and drivers of wheelchair accessible taxis when using taxi ranks. There is an opportunity to include accessibility requirements for taxi ranks to ensure they are fit-for-purpose and accessible to mobility aid users. **Option: Regulatory** **Response:** NITAN is of the view that sub-Option 3 is preferred.

49.	Accessible passenger loading zones on-street	Many passenger loading zones are not fit-for-purpose as boarding points for wheelchair accessible taxis and small conveyances, as they are inaccessible to people using wheelchairs or other mobility aids. There is an opportunity to recognise on-street passenger loading zones as boarding points to assist rear loading of wheelchair accessible taxis and ensure people with disability using wheelchairs or other mobility aids can safely traverse over a kerb onto the footpath. **Option: Regulatory** **Response:** NITAN is of the view that sub-Option 3 is preferred.
50.	Accessible parking spaces in infrastructure off-street carparks	There are no requirements for off-street parking areas associated with public transport infrastructure, or specifications for accessible parking spaces or the access paths connecting them to accessible entrances. There is an opportunity to set requirements for off-street parking areas to provide accessible parking spaces that are in close proximity to building entrances with room to manoeuvre, load and unload, and are clearly identified as accessible. **Option: Regulatory** **Response:** NITAN is of the view that sub-Option 2 is preferred.
51.	Grab-rails on access paths	There is no requirement or guidance to provide grab-rails along access paths on board conveyances, which poses a risk to the safety of people with ambulant disabilities using public transport. There is an opportunity to improve accessibility along conveyance access paths by providing grab-rails that have sufficient luminance contrast. **Option: Regulatory**

52. Grab-rails in allocated spaces	There is insufficient guidance and clarity on the layout of grab-rails in allocated spaces, and no requirement for grab-rails to have sufficient luminance contrast, which poses a safety risk to people with vision impairment using public transport. There is an opportunity to provide clarity on the layout of allocated spaces across different modes of transport to allow for differences in position, and include requirements on the minimum luminance contrast for grab-rails. **Option: Regulatory**
53. Mobility aid movement in allocated spaces: Passive restraints	Requirements to contain the movement of mobility devices in allocated spaces are currently inadequate, which presents a risk to the safety of people travelling with mobility aids as these can topple or slide due to displacement forces that occur during transit. There is an opportunity to provide more defined requirements for the containment of mobility aids in allocated spaces on conveyances. **Option: Regulatory**
54. Mobility aid movement in allocated spaces: Active restraints	There is a lack of clarity on the technical requirements for active restraints, and when and where the provision of active restraints is required. There is an opportunity to prescribe a national standard for a minimum level of safety and amenity for active restraints for mobility aids in allocated spaces on conveyances. This includes mandatory safety belts, and to provide a definition for active restraining systems. **Option: Regulatory**
55. Appropriate seats on booked services	The requirements for booking accessible seats are no longer fit-for-purpose as they do not account for modern booking systems or adequately consider requirements to book seats appropriate for the diverse and nuanced needs of people with disability. There is an opportunity to update the accessibility requirements for booking appropriate seats to accommodate contemporary and future booking technology. **Option: Regulatory**

56. Conveyance dwell times at stops	Safety issues arise when a conveyance departs before people with disability are appropriately seated, which may discourage people with disability from using certain public transport modalities. There is an opportunity to include requirements on safe dwell times to ensure there is adequate time to allow people with disability to safely reach or leave their seats or allocated spaces when boarding or alighting. **Option: Regulatory**
57. Stairs on trains	The requirements for stairs are not specific to each type of public transport conveyance, and as a result they are not fit-for-purpose for trains as the provision of internal stairs on rail cars is not always achievable. There is an opportunity to update references to Australian Standards and set requirements for stairs specific to trains which provide greater accessibility features. **Option: Regulatory** **Response:** NITAN is of the view that sub-Option 3 is preferred.
58. Stairs on ferries	There are no specific requirements for internal ferry stairs, posing a safety risk to people with disability who may not be able to traverse stairs safely. There is an opportunity to update references to Australian Standards for stairs on ferries to provide modality specific requirements that are aligned with industry standards and have additional accessibility features. **Option: Regulatory** **Response:** NITAN is of the view that sub-Option 3 is preferred.
59. Stairs on buses	There are no specific requirements for stairs on buses, and the existing requirements are lacking accessibility features for people with disability to be able to use stairs on buses. There is an opportunity to update references to Australian Standards and provide specific requirements for stairs on buses which are aligned with industry standards and are accessible to people with disability. **Option: Regulatory**

| 60. | Doorway contrast and height | There are no set requirements for the minimum safe height and luminance contrast of doorways on conveyances, which poses a safety risk for head strikes. There is an opportunity to set minimum safe height and luminance contrast requirements for solid and glazed doors, and to harmonise these requirements with the Premises Standards.

Option: Regulatory |
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| 61. | Implementation approach | Any agreed regulatory changes to the Transport Standards will require an implementation approach so stakeholders have certainty on the compliance obligations of public transport operators and providers. There is an opportunity to develop a compliance plan for implementing any revised Transport Standards with fit-for-purpose provisions and mechanisms to manage the compliance of existing assets.

Option: Regulatory

Response: NITAN is of the view that any implementation process must include people with disability. A co-design approach that enables active participation that ensures positive outcomes for all is key to successful implementation. Once decided, this plan must be legislatively enforced. |