



RAAA SUBMISSION

Draft Report

Review of the Disability Standards for Accessible Public Transport 2002

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Serving regional aviation, and through it, the people and businesses of regional Australia

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11 July 2014

Disabilities Transport Access Secretariat
Road Safety Transport Access Branch
Department of Infrastructure and Regional Development
GPO Box 594
CANBERRA ACT 2601

Dear Sir,

RAAA SUBMISSION

Draft Report Review of the Disability Standards for Accessible Public Transport 2002

The RAAA is pleased to provide this submission in response to the Draft Report - Review of the Disability Standards for Accessible Public Transport 2002.

I. RAAA Background

The RAAA and its Members

The Regional Aviation Association of Australia (RAAA) is a not-for-profit organisation formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia (RAAA) and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 28 Ordinary Members (AOC holders) and 69 Associate/Affiliate Members. The RAAA's AOC members directly employ over 2,500 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1.5b, carry well in excess of 2million passengers and move over 23 million kilograms of freight.

RAAA members operate in all States and Territories and include airlines, airports, freight companies, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional and remote areas of Australia.

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RAAA Charter

The RAAA's Charter is to promote a safe and viable regional aviation industry. To meet this goal the RAAA:

- promotes the regional aviation industry and its benefits to Australian transport, tourism and the economy among government and regulatory policy makers;
- lobbies on behalf of the regional aviation industry and its members;
- contributes to government and regulatory authority policy processes and formulation to enable its members to have input into policies and decisions that may affect their businesses;
- encourages high standards of professional conduct by its members; and
- provides a forum for formal and informal professional development and information sharing.

The RAAA provides wide representation for the regional aviation industry by direct lobbying of Ministers and senior officials, through parliamentary submissions, personal contact and by ongoing, active participation in a number of consultative forums.

II. INTRODUCTION

The RAAA welcomes the Draft Report for the Review of the Disability Standards for Accessible Public Transport 2002. The RAAA would also like to acknowledge the extensive consultation process undertaken by the Department of Infrastructure and Regional Development for this review. We understand that many of our Member's took the opportunity to attend the public consultation sessions around Australia.

As indicated in our response last year, it is important to our Member's that people living with a disability have an equal opportunity to travel by air and that in undertaking their travel their rights and dignity are not impaired.

As we have previously highlighted in our response to this review, and also at the public consultations we attended, it is important that a "one hat fits all" approach is avoided. In relation to aviation there is an array of different sized aircraft and aircraft capability being used to provide services to the travelling public, a large difference in the size and capabilities of the operators providing these services, a multitude of business models being used to ensure the viability of operations, and a large difference between the airport infrastructure found at different locations around Australia.

Our responses to the recommendations made in the Draft Report for the Review of the Disability Standards for Accessible Public Transport 2002 are aimed at meeting the key points in the preceeding two paragraphs.

III. RAAA RESPONSE TO THE REPORT RECOMMENDATIONS

	ASRR Recommendation	RAAA Position
1.	National reporting on compliance That the Australian Government, jointly with state and territory governments, establish a national framework for reporting on compliance by 30 June 2016.	Support with qualification
2.	Modernise the Transport Standards That the Australian Government, jointly with state and territory governments, commence a process for updating and modernising the Transport Standards. This work should be undertaken in close consultation with local government, industry and the disability sector, and include research on the technical issues raised in this review, the development of options, and assessment of the impact of any proposed changes to the standards, with this work to be completed by 30 June 2016.	Support
3.	The complaints process That the Australian Government considers the concerns raised about the complaints process.	Support with qualification
4.	Whole-of-journey accessibility That the Australian Government, jointly with state, territory and local governments, develop accessibility guidelines for a whole-of-journey approach to public transport planning by 31 December 2015.	Support with qualification
5.	National motorised mobility aid labelling scheme That the Australian Government in collaboration with state and territory governments to develop and implement a national motorised mobility aid labelling scheme.	Support Strongly
6.	National wheelchair accessible taxi compliance milestones That the Australian Government, jointly with industry, state and territory governments, develop consistent national compliance milestones and response times for wheelchair accessible taxis by 30 June 2016.	No Response
7.	Review of Disability Access Facilitation Plan That the Department of Infrastructure and Regional Development, in close consultation with the Aviation Access Forum, undertake a review of the Disability Access Facilitation Plan initiative by 30 June 2015, with the aim of improving the overall effectiveness and accessibility of the plans.	Support

Recommendation 1: Support with qualification

Aviation in Australia is comprised of a wide variety of different operators from large to small operating within multiple government jurisdictions. Of concern to the RAAA are excessive obligations on industry, especially on smaller operations, and duplication of reporting. Smaller operations have limited personnel and other resources with concentration primarily on the day to day operation/survival of their business.

To take the above into consideration it is felt that any national framework for reporting on compliance needs to:

- (a) ensure that duplication in reporting is not created taking into consideration any current and intended future obligation/s.
- (b) be tiered with the required obligation appropriate for the size of the operation in question.
- (c) provide reporting templates and guides (with real world examples) – especially for smaller operations.

Recommendation 2: Support

Although we agree with this recommendation it is felt that the recommended intended completion date of 30 June 2016 may be optimistic taking into consideration the width of consultation required and subsequent diversity of agreement required.

Recommendation 3: Support with qualification

The RAAA supports any streamlining of the complaints process. However, any use of legal resource should be a last means of resort to minimise not only costs to the complainant but also to the service provider, especially smaller service providers. Any robust system of complaint should involve at least three tiers incorporating:

- direct discussion between the complainant and the service provider; and if this fails
- through mediation; and only if this fails then
- through a court for determination/ruling.

Based on the above the RAAA supports the implementation of the second option of the 2007 Review with the *"AHRC to provide greater facilitation of representation of representative complaints where conciliation does not produce an outcome"*.

Recommendation 4: Support with qualification

It is important that any “whole of journey” approach needs to take into consideration the magnitude of difference associated with different aircraft, operator resources, business models used and also the vast difference in airport infrastructure and resources located at different airports around Australia. The RAAA opposes any requirement which would place the responsibility solely on the aircraft operator. Accordingly, the RAAA supports standards that are outcome based and allows an aircraft operator to include in their Disability Access Facilitation Plan (DAFP) implications for the different aircraft in their fleet and also the different locations around Australia they service. As outlined in our submission to the review aircraft operators should be able to consult with the AHRC, at no cost, in relation to their DAFP. This will provide the opportunity, prior to plans being published/updated, of ensuring DAFP’s meet the requirements of the Disability Standards for Accessible Public Transport 2002 whilst taking into consideration real world practicalities of providing services to the general public.

Recommendation 5: Support strongly

The RAAA strongly supports a standardised labelling scheme for electronic mobility devices that provides weight and dimensions to assist storage implications in the aircraft. A natural progression of this, that should be of benefit to consumers of these products, is a simple code they can use to ascertain at purchase in what public transport circumstances the electronic mobility device can be used. Any criteria for potential codes should ultimately, in relation to aviation, be vetted through and agreed by the members of the Aviation Access Forum.

Recommendation 6: No Response


Recommendation 7: Support

As a member of the Aviation Access Forum the RAAA supports the Disability Access Facilitation Plan (DAFP) initiative and also a review of the initiative. A review process is important to ensure that operators have constructive feedback on how their plans are achieving desired outcomes.

IV. CONCLUSION

The RAAA is grateful for the opportunity to provide our views on the Draft Report for the Review of the *Disability Standards for Accessible Public Transport 2002*. If you would like further information about the items contained in this submission, or clarification on any of the points we make, the RAAA would be more than happy to assist.

Regards,

A handwritten signature in dark ink, reading "Paul Tyrrell", is positioned above the printed name.

Paul Tyrrell
Chief Executive Officer