



**FAR NORTH QUEENSLAND TOUR OPERATORS ASSOCIATION**

**Submission on the Review of the Disability Standards  
for Accessible Public Transport 2002**

**August 2007**

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## 1. EXECUTIVE SUMMARY

The FNQ Tour Operators Association ("FNQTOA") acknowledges the objectives of the Disability Discrimination Act 1992 (the "Act") and the need to translate those objectives into action within all aspects of our community.

FNQTOA commends the Commonwealth Government on the development and implementation of the Disability Standards for Accessible Public Transport 2002 (the "Standards") as well as honouring its commitment to a review process.

Clearly, there is a balancing act that must be undertaken in relation to the cost of compliance and the benefits to the community. This balancing act is acknowledged and considered in detail in the Regulatory Impact Statement on the Draft Disability Standards for Accessible Public Transport 1999 (the "RIS") in the broader context of regular public transport.

FNQTOA's main concern with the Standards is with compliance with those parts of the Standards designed to accommodate the needs of those persons with a moderate to severe mobility impairment in the context of road and water based regional tourism operations.

FNQTOA submits that the cost benefit analysis that was deemed acceptable for the purpose of promulgating the Standards does not accurately reflect the true position of regional tourism operations where the likely demand for access is significantly lower and the cost of compliance is considerably higher.

Given that regional tourism operators are a discrete group and the impacts of compliance are likely to have universal effect on them, regional tourism operators such as the members of FNQTOA should be excluded from the scope of application of the Standards dealing with the mobility impaired. The alternative is to expose operators to the uncertainty, risk and cost involved in the ad hoc process of applying for exemptions and/or unjustifiable hardship either via applications to the Commission and/or appeals by way of review or alternatively wait for tribunal / court hearings and the expense, stress and uncertainty that they entail.

## 2. BACKGROUND

In 2002, the Standards were issued pursuant to the Act. The Standards prescribe a variety of measures that are required to be put in place by operators of public transport services, with the first round of measures required to be in place by 31 December 2007 (the "Initial Compliance Date").

The Federal Government has commissioned a review of the Standards leading up to the Initial Compliance Date, with a view to ascertaining the effectiveness or otherwise of the Standards in the five year period since they were introduced.

The Government has called on submissions from stakeholders affected by the Standards as part of the review process. FNQTOA has compiled this submission to Government to put forward the concerns of its members on the Standards as they currently stand.

## 3. FAR NORTH QUEENSLAND TOUR OPERATORS ASSOCIATION

The Far North Queensland Tour Operators Association is, as the name suggests, an association of tour operators operating in and around the Cairns region. FNQTOA has some 23 active members providing a diverse range of tours from 4wd adventure tours to Cape York and into the Gulf Savannah, to coach services in and around Cairns, to a Crocodile Adventure Park, to the Cairns Skyrail.

In preparing this submission, FNQTOA commissioned The 20/20 Group, a business and marketing consultancy based in Cairns, to interview its members to gather information and members' concerns for inclusion in the submission. Appendix 1 details the methodology employed by The 20/20 Group in carrying out their research.

## 4. OUTLINE OF SUBMISSION

As outlined above, the focus of FNQTOA's members' concerns relates to compliance with those parts of the Standards designed to accommodate the needs of those persons with a moderate to severe mobility impairment in the context of road and water based regional tourism operations.

In particular, compliance with the Standards raises a number of issues for FNQTOA's members, including:

- The level of demand.
- The nature of the tours offered and lack of facilities at destinations
- The difficulty in implementing the Standards.
- The cost of compliance.
- Consistency of application.
- The operation of the unjustifiable hardship provisions and exemption from the Standards.

These issues are addressed in turn below, with FNQTOA's recommendations on how these issues can be addressed set out at the end of the submission.

## 5. LEVEL OF DEMAND

### ***Actual Demand***

One of the major concerns FNQTOA members have in relation to the modifications required to be made to their conveyances under the Standards relates to the level of demand that exists in the market place for allocated spaces on conveyances in the local region, which has a direct flow on to return on investment.

Simply put, at present there is very little demand for wheelchair accessible services in the Cairns region, certainly not enough to justify 25% of fleets being made wheelchair accessible, let alone 100% of the fleet. That is not to say that operators are not making some attempt to make some vehicles compliant. It is just that demand is demonstrably weak for allocated spaces.

A contributing factor to weak demand is that tour operators typically are not providing essential commuter or regular Public Transport Scheduled Services (Route Services) from point A to point B, rather they cater for discretionary, recreational demand. This factor is discussed in greater detail in Section Six below. The difference is further exacerbated because of seasonal variations in the tourism industry.

The FNQTOA members consulted that operate coaches or buses as part of their services, reported, that the number of mobility impaired passengers carried in aggregate amounted to only 0.015% of the total number of passengers carried in the last year. In raw numbers, of the 1.1 million passengers carried by the members consulted who operated buses and coaches, only 170 were mobility impaired (where wheelchair usage was involved).

It should be noted that the operators include several who go out of their way to provide access to wheelchair bound passengers, despite not having compliant vehicles. Indeed, The 20/20 Group research showed that some operators talk about the pleasure of accommodating mobility impaired people on their tours and the rewards for them and their staff in sharing the experience, particularly in the challenging environment of adventure tours.

### ***Example 5.1***

As an example, one of the major coach operators in Cairns has a coach with two wheelchair accessible seats. The operator is flexible on the use of this coach on a day to day basis and the coach is able to be used on most of the tour itineraries. The operator specifically deploys this coach whenever it receives an enquiry for wheelchair accessible services. For the operator in question, 0.0035% of its passengers for the year required the use of fully wheelchair accessible seating. Further, the carriage of wheelchair bound passengers per year since 2002 only amounts to a 4% occupancy of the currently available wheelchair accessible seats. In terms of opportunity cost (the standard seats forgone), this very low occupancy is even lower.

This low take-up is despite the fact that this major operator acquired this dedicated wheelchair accessible vehicle in 2002 and marketed that fact and trained its staff in anticipation of strong bookings for its services.

These tours with wheelchair friendly coaches have also been advertised on websites promoting wheel chair accessible holidays in and around the Cairns region, such as [www.wheelieeasy.com.au](http://www.wheelieeasy.com.au). Given this targeted promotion of its wheel chair accessible services, it is considered unlikely that demand for the accessible bus services is likely to

increase by any substantial margin in the medium term. Although the operator is committed to retaining this coach, the potential impost of converting the total fleet is considered prohibitive without any net benefit either to the operator or to the disabled community.

Under the Standards as currently drafted, the operator will be required to add wheelchair accessible seats across 25% of its fleet, plus in all of its buses acquired since 2002. This equates to well in excess of 20,000 seat days per annum. Even if the number of wheelchair bound passengers carried each year increases by 100%, this company would only realise a 0.23% utilisation of its wheelchair accessible bus seats.

[Note: For commercial-in-confidence reasons FNQTOA cannot provide individual numbers of passengers/seats in this submission, but these can be provided separately if required.]

### ***Example 5.2***

The first example is confirmed by the experiences of another FNQTOA member who operated a Wheelchair Accessible bus from 2003 to 2005.

The operator in question acquired a bus with 16 seats plus three wheelchair accessible spaces with a view of capitalising on a perceived gap in the market in Cairns. Despite marketing its services throughout the period, the business did not receive any enquiries at all for its accessible bus during that time and ultimately sold the bus at a large loss as no other operators wanted or had reason to buy it.

### ***Conclusion – Level of Demand***

If the roll out of the Standards across all operators occurred, it can only be concluded that utilisation of accessible seats would be diluted to almost negligible levels and that many tour operators' businesses would be unsustainable, due to the high costs incurred versus negligible additional income.

It should also be noted that there is a large difference between tour operators doing discretionary/recreational day or multi-day round trips where seats are sold on a per day (or multi-day) basis compared to commuter/route bus services around town.

The Standards currently fail to recognise the difference between a transport operator that takes a disabled passenger from point A to point B where the disabled person necessarily would need to take their wheelchair with them, from tour operators which return passengers to their point of origin, and which could potentially accommodate wheelchair bound passengers via fold up wheelchairs held on standby (in a similar way airlines do).

Relevant to this differentiation issue is whether people travel alone, in pairs or as a group. FNQTOA does not have access to detailed commuter travel data, but it believes that it would be fair to assume that a very high proportion of commuter passengers using public transport travel alone, including those with disabilities, and would therefore need dedicated allocated spaces on vehicles with suitable access provided.

On the other hand, those travelling for recreation, such as would use FNQTOA services, would have a very high probability of travelling in at least pairs; for people in wheelchairs, over 90% travel with one or more companions<sup>2</sup>. Furthermore, “the most common form of transport used by people with disabilities is **driving their own car**<sup>3</sup>. This is the most cost efficient and convenient as it provides transport that they can use once at their destination.” This serves to reinforce the finding that there is poor demand for disability access on tour services.

According to operators, it appears that the demand in the local market, small though it is, is targeted at capacity to carry fold up wheelchairs, rather than for wheelchair accessible spaces on buses and coaches. That is, it is the operators’ experience that mobility impaired visitors to the region who are looking to go on tours throughout the area generally travel with a fold up wheelchair and require storage space for the wheelchair and assistance to get into the coach, rather than access to a wheelchair accessible space on coaches and buses. In this regard, anecdotally, it seems a large proportion of operators do accommodate disabled people in this way.

<sup>2</sup> Tourism Queensland Fact Sheet titled “Disability Tourism 2002” at Pg 4 – See Appendix 3

<sup>3</sup> Tourism Queensland Fact Sheet titled “Disability Tourism 2002” at Pg 3 – See Appendix 3



## 6. NATURE OF TOURS / FACILITIES AT DESTINATIONS

### ***Nature of Tours and Available Facilities***

Tied with the level of demand is the nature of the tour packages offered by FNQTOA members and the facilities available at destinations visited as part of the tours.

Generally speaking, people travelling with a disability will necessarily take the time to research the level of access to recreational facilities available to them when travelling to any region. The existence of websites such as [www.wheelieeasy.com.au](http://www.wheelieeasy.com.au) supports this view. Not to do so would no doubt leave travellers disappointed and out of pocket if they arrived at a location not able to service their needs.

As demonstrated in section 5 above, there is a large excess in capacity of wheel chair accessible spaces on conveyances in Cairns currently. So it is not necessarily a lack of accessible tour transport that deters wheel chair bound travellers from going on tours operated by FNQTOA members. Rather, in our view, the major cause of the lack of demand for wheelchair accessible spaces in conveyances operated by FNQTOA members is the overall general lack of facilities for wheelchair users at many of the tour attractions in the Far North Queensland region and the “adventure travel” nature of many of the tours on offer.

Whilst there are a number of accommodation options for visitors to the region requiring accessibility, the nature of the region’s natural/adventure attractions, which are a feature of a large proportion of the tours conducted by FNQTOA members, limit the extent to which the attractions are wheelchair accessible.

Accordingly, it is commonly not practical for operators to modify their conveyances to meet the Standards in relation to wheelchair accessibility given that the locations that they typically visit are not themselves wheelchair accessible. Simply put, there is no point having a coach capable of carrying a wheelchair to a destination when the destination itself is not suitable for wheelchairs. For example, of all the Queensland Parks and Wildlife’s national parks in the Far North Queensland region, only two are fully wheelchair accessible.

### ***Adventure Travel***

A number of FNQTOA members operate “adventure travel” tours and are therefore specifically exempt from the standards in respect of the “adventure travel” portion of their operations only. However, the “adventure travel” exemption in the standards does not apply to “the extent that the service operates to move the public from one location to another distant location”.

The operation of this exception to the adventure travel exemption is not clear and/or has a potentially unintended effect.

Using the example stated in the Standards of Hot Air Ballooning to illustrate the point, whilst the Hot Air Balloon trip itself is defined as “adventure travel” and exempt from the Standards, based on the wording of the exception, that part of the Hot Air Balloon trip that involves picking up customers from their places of accommodation and transferring them to the site of the Balloon launch would not be exempt from the standards and therefore, without more, the coach used for the transfer would need to comply with the Standards.

Given that the sole purpose of the coach transfer is to take passengers intending to board a Hot Air Balloon, which is not required to comply with the standards (and by its nature, and under direction from CASA, cannot take mobility impaired passengers at any rate), it is incongruous that the coach is required to provide a wheelchair accessible seat under the standards.

## **7. DIFFICULTY IN IMPLEMENTING STANDARDS**

In some instances there are practical difficulties in implementing the standards.

### ***Luggage Space / Towing Trailers***

The Standards require that the larger coaches are required to incorporate 2 wheelchair accessible spaces. The modifications required to provide wheelchair access in the high floor buses utilised by FNQTOA's members require the use of one of the three luggage storage bins typically present on these larger coaches within which to mount the hydraulic lift.

This loss of one third of the luggage space out of the larger coaches will have a significant impact on their ability to carry passenger's luggage and operate effectively as transfer / tour conveyances.

Again, the standards require that small coaches are required to incorporate 1 wheelchair accessible space. In some smaller coaches, the modifications required to provide wheelchair access include a hydraulic lift at the back of the bus, as opposed to larger buses and coaches which can generally incorporate the lift at the side of the bus.

In having a large hydraulic lift at the rear, the coach would not be able to tow a trailer at all whilst still being able to practically utilise the rear lift.

Given that coaches of this size would need to tow a trailer to have any sort of luggage carrying capacity, which is required to accommodate the material proportion of passengers carried who are in transit with their luggage, having the lift, and therefore not being able to tow a trailer, would mean the coach could not carry passenger's luggage and therefore could not function effectively as transfer or tour vehicles.

### ***Impact on Scheduling***

Another practical restriction to modifying coaches to include wheelchair accessible spaces is the effect on scheduling.

Unlike route bus services which typically operate with low floor buses which make wheelchair access relatively quick and easy, the buses used by tour operators, being high floor buses, require lift mechanisms to enable wheelchair access. With a conservative estimate of the load/unload time of 15 minutes per stop, tours incorporating multiple stops during the day and which are time constrained as it is, can not effectively operate.

Whilst operators are very willing to include disabled passengers on their tours, it is not practical for tours to experience delays of the magnitude that would be experienced over a number of stops across an already tight daily schedule.

Additionally, operators' fleets are tailored to meet their tours and itineraries and comprise vehicles with seating configurations that match the typical demand experienced for their tours. With the loss of a significant percentage of seats out of compliant vehicles, operators will no longer have the suitable number and capacity of buses to deal with their regular schedule.

Whilst it can be argued that operators should simply substitute appropriately sized larger buses as required to cater for the lost number of seats, this is simply not possible for operators with small fleets. In time, of course, operators may be able to replace the vehicles with larger buses and coaches to regain appropriate capacities. However, larger vehicles will bring with them increased running and maintenance costs, so that the overall cost of implementing the required modifications is amplified yet further. This also ignores the fact that, for some tours, vehicles sizes are limited due to the nature of the roads travelled on or region visited.

In the meantime, operators are left faced with an, in some cases substantially, reduced seating capacity with which to operate their regular tours and transfers, complicating scheduling and potentially causing loss of tours, and therefore income, due to no longer having the requisite seating capacity.

### ***Lack of Support Staff in the Field***

The majority of operators run their vehicles with one driver/guide. In these circumstances, the driver has no support staff while out on the road which complicates the process of dealing with wheelchair bound passengers, particularly those that may wish to travel without a carer. This is particularly important in relation to any special medical requirements that wheelchair bound passengers may have, as staff, though trained in first aid, are not qualified or trained to deal with any escalated medical issues that may arise.

Workplace Health and Safety restrictions also complicate this issue, with drivers unable to lift heavy weights, such as may be required with wheelchair bound passengers.

## 8. COST OF COMPLIANCE

Operators are faced with significant installation costs to accommodate allocated space – either factory-fitted or retro-fitted. In addition to the actual modification cost, operators will sustain ongoing maintenance costs and other costs through loss of income due to lost seats (opportunity cost).

### *Economic Cost of Installation*

The cost of modifications of vehicles is a major impediment for all members of FNQTOA in terms of being able to comply with the Standards, with the cost of retrofitting existing vehicles amounting to as much \$70,000 per vehicle in some instances<sup>4</sup>. Demonstrating that different coaches require different amounts of work in order to be made compliant, the quote received by one operator to retrofit a medium sized, 53 seat coach amounted to \$39,610.<sup>5</sup>

With smaller coaches, the cost is still significant, with one operator reporting a quoted cost of \$26,095 to have a 20 seater coach modified<sup>6</sup>. It should be noted that this quote allows for the installation of 2 allocated spaces, rather than the one space required under the Standards for this size coach, due to the fact that it is more cost effective to insert a second allocated space when the first allocated space is installed. That is, the second allocated space can be installed for little additional cost and, given the requirement to install an allocated space, the operator may elect to install an additional allocated space for operational efficiencies in the future.

Yet another operator received an estimate which gave a quoted range from \$25,000 to \$42,000 per vehicle to have 21 to 30 seat coaches made compliant.<sup>7</sup>

<sup>4</sup> As per estimate received from Shed 28 Coach Care dated 14 August 2007 – see Appendix 2.

<sup>5</sup> As per quote received from Coachworks Pty Ltd dated 10 July 2007 – see Appendix 2.

<sup>6</sup> As per quote received from Coachworks Pty Ltd dated 10 July 2007 – see Appendix 2.

<sup>7</sup> As per estimate received from Shed 28 Coach Care dated 14 August 2007 – see Appendix 2.

### ***Economic Cost of Maintenance***

Annual ongoing maintenance of the relevant moving parts such as the lifts and hydraulics will include material and repair costs, as well as inspection costs, and these will further increase the whole of life cost of the modifications. Reliable estimates for the actual cost of this maintenance are yet to be determined, but are expected to be material and will therefore negatively impact on each operator's bottom line.

### ***Opportunity Cost of Seating Loss***

The number of seats that will need to be removed from each vehicle to make them compliant varies depending on the size of the vehicle. For larger coaches, as many as eight seats will need to be removed in the first instance to make way for the two allocated spaces required under the Standards. In smaller vehicles, up to four seats will need to be removed in the first instance to provide one wheelchair accessible space.

These seating loss figures are based on 2 pairs of side by side seats (i.e. 4 seats) needing to be removed to provide the physical space to fit in each allocated space.<sup>8</sup>

This reduction in seating capacity at best results in a not insubstantial reduction in seating capacity (11.3% of seats lost in a 71 seat bus) to, at the worst, a prohibitive reduction in the utility of the vehicle (36% of seats lost out of an 11 seat coach).

It is possible for temporary seating to be installed in place of the allocated spaces which will alleviate the problem of lost seating capacity in some cases. However, whether it is an option to utilise replacement seating or not depends on the coach in question and whether or not the internal layout and way the coach is constructed are suitable for removable seats to be safely installed. In addition, in some instances, it is not possible for all of seats removed to be replaced with an equivalent number of removable seats.

Whether or not removable seating can be utilised has to be assessed on a case by case (bus by bus) basis, and therefore the actual mitigation of the loss of income caused by the loss of seating capacity through the use of removable seats cannot be accurately calculated on a global basis.

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<sup>8</sup> Refer to quote from Coachworks Pty Ltd dated 10 July 2007 – see Appendix 2.

Having said that, the following table demonstrates the actual number of seats that will have to be removed to accommodate the allocated spaces in the various sized conveyances.

Coach Size	Number of Seats Lost	New Size	Allocated Spaces	Capacity Lost
71	8	63	2	11.3%
51	8	43	2	15.7%
48	8	40	2	16.7%
30	8	22	2	26.7%
21	4	17	1	19.0%
14	4	10	1	28.6%
11	4	7	1	36.4%

Clearly, the loss of such significant proportions of seats from their vehicles will have a material adverse economic impact on operators. Whilst some lost seats will be able to be replaced by removable seating in some coaches, the reduction in seating capacity experienced by operators which will likely lead to a higher cost of tour services, will inhibit demand thereby further reducing operator's income.

### ***Broader Economic Implications***

Apart from the cost to individual businesses, there is an important broader economic cost that may arise from having to implement the modifications required under the standards.

One of FNQTOA's members was part of an independent Government study into the impact a proposed increase of National Parks camping fees would have on their business approximately five years ago. As part of the study, the Government calculated that the operator contributed approximately \$750,000 to the remote communities it visited as part of its tours, both through direct spending and the spending of its passengers. With growth of the business over the intervening years, this figure is now estimated to be in excess of \$1 million annually, with multiplier effects likely to be significant.

Given the costs operators will incur in complying with the Standards, some may opt to shut down as it is economically unviable to continue in business, particularly as things currently stand where they would be required to operate without any certainty regarding the application of the unjustifiable hardship provision to their business and the inability to

obtain an exemption from the standards based on economic grounds<sup>9</sup>. Both of these issues are discussed later on in this submission.

If the example operator above chose to close as a result of the impact of compliance under the standards, its \$1 million expenditure would no longer be spread through those communities, no doubt to the communities' detriment. The staff of those tour operators who chose to close would also face redundancy.

### ***Example 8.1***

In terms of total figures, one of the larger coach operators in Cairns is facing a total modification bill in excess of \$1.5 million to reach 100% compliance. The bill to reach 25% compliance is itself very expensive at \$375,000. This operator enjoys around 87% utilisation of capacity in its coaches on average year round. With the loss of 8 seats from each large coach, the income that will be lost due to the loss of those seats equates to over \$65,000 per annum in a large coach (53 seats) and over \$49,000 for smaller coaches (20 seats)<sup>10</sup> based on the loss of 4 seats.

This operator currently carries about 30 wheelchair bound passengers per annum utilising its one wheelchair accessible coach, with the wheelchair seats operating at a year round average of 4% of capacity. Given that this operator already has excess capacity for the demand for wheelchair accessible seating it encounters, the requirement to modify additional vehicles out of this operator's fleet, when faced with a substantial opportunity cost for each vehicle, is clearly excessive, particularly considering the large number of coaches concerned.

### ***Example 8.2***

A relatively small operator member of FNQTOA has calculated that, assuming 4 seats are lost out of each vehicle it will cost them approximately \$24,000 per vehicle at their typical 86% capacity over the course of the year. With its fleet of seven vehicles, this translates to a total opportunity cost loss of \$168,000 per annum once 100% compliance with the Standards is implemented.

<sup>9</sup> A number of the smaller operators interviewed by The 20/20 Group specifically stated they would close down rather than have to comply with the Standards due to the costs involved.

<sup>10</sup> Annual lost opportunity per coach calculated as daily seat price x no of seats lost x 365 days x 87% of capacity.



In the past five years this operator has fielded around two to three enquiries for wheelchair accessible services each year demonstrating the limited scope for it to earn any material income (return on investment) out of having accessible spaces installed in its vehicles. A decision to comply with the standards would clearly make the operation of the business questionable.

### ***Conclusion – Cost of Compliance***

These two examples are reflective of the experience that the FNQTOA's members consulted by The 20/20 Group reported, with the general rule that the smaller the vehicle the worse the equation becomes. Furthermore, the level of demand for accessible spaces, which is discussed in greater detail in Section Five of this submission, simply will not defray the cost of compliance with the Standards from the point of view of the modifications alone, let alone the opportunity cost and ongoing maintenance costs that will also be incurred.

FNQTOA submits that if members are required to comply with the Standards in their current form, operators would be faced with economic hardship and many would be faced with the decision to “shut up shop” or increase prices to an unsustainable level.

Whilst operators would be able to present their case under the ‘unjustifiable hardship’ provisions in the Standards and legislation on a case by case basis, this consistent hardship theme amongst operators suggests that in the future such cases could unnecessarily take up time in the Human rights and Equal Opportunities Commission and clog up the Commission. Each operator would also incur significant administration, legal and accounting costs in making their application to the Commission, thus increasing the economic pressure on operators.

A period of uncertainty would prevail whilst cases are waiting to be heard and many operators may indeed decide that it is all too hard.

The fact that economic concerns are not applicable for exemption applications is also relevant. The issue of the uncertainty this results in was discussed in greater detail in Section 6 above.

## 9. CONSISTENCY OF APPLICATION

### ***Pre-Booked Services***

The RIS makes specific reference to the distinction between pre-booked transport services and those services where immediate service is provided. The RIS makes this distinction in terms of the operation of limousines and hire cars compared to taxis.

Paragraph 6.7 of the RIS relevantly states:

“Discussion with transport officials in the States and Territories, as well as submission received during the consultation phase, would suggest that both limousines and hire cars should be exempt from the draft Standards. There is strong argument in relation to veteran and antique model vehicles that to make such vehicles accessible would involve unjustifiable hardship. This is particularly so given that this industry appears to be comprised of a relatively large number of operators with a small number of vehicles. This contrast with the position for much, but not all of the taxi industry”.

“In most cases, limousines and hire cars must be pre-booked and cannot sit at taxi ranks. This would suggest not only that response times are not an issue, but also that limousines and hire car operators are competing with taxi operators in a very limited sense.

As limousines and hire cars do not operate on the same basis as taxis and are a pre-booked and often unique service, there is a strong argument that it would not be practical or viable to have the draft Standards apply to them as they would apply to a taxi service...”

From the above, it can be seen that, limousines and hire cars were exempted from the Standards on the basis that they are a “pre-booked” service and because compliance

would likely cause operators unjustifiable hardship in any event. However, there are many other “pre-booked” “Public Transport Services” in the marketplace aside from Limousines and Hire Cars that do not expressly currently benefit from an exemption from the Standards.

All of the bus and coach tours provided by FNQTOA's members are pre-booked<sup>14</sup>. That is, passengers do not just walk onto the bus or coach at the beginning of a tour and buy a ticket, but rather must have pre-booked a seat on the tour to get on board.

This element of pre-booking enables FNQTOA members to include disabled passengers on their tours at present, where practical to do so, having regard to the nature of the tour and the locations visited.

The arguments put forward in the RIS that formed the basis for limousines and hire cars being exempted from the Standards apply equally to the buses and coaches operated by FNQTOA's members by analogy. The RIS discusses the distinction between Taxi's which are an on-demand service which need to be able to accommodate a passenger at any given point in time, and limousines and hire cars, which are typically pre-booked services. The RIS also contemplated the modification of limousines and hire cars as involving unjustifiable hardship.

As outlined in the next section of this submission, the modification of FNQTOA's buses and coaches will also likely involve unjustifiable hardship for operators, given the stated costs of modifications, plus the other ongoing costs, versus the demonstrated very little demand for allocated spaces on coaches in this region. In addition, the tours offered by FNQTOA's members are by their nature pre-booked and are not by their nature in any way similar to the services offered by “route bus” operators.

Accordingly, to borrow the words of the RIS, “there is a strong argument that it is not practical or viable to have the Standards apply to FNQTOA members' buses and coaches as they apply to regular public transport (route bus) operators.

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<sup>14</sup> As per The 20/20 Group's research.

## 10. UNJUSTIFIABLE HARDSHIP / EXEMPTIONS FROM THE STANDARDS

Under the Disability Discrimination Act and the Standards, it is not unlawful to fail to comply with the standards if to do so would impose unjustifiable hardship on the operator. The operation of these Unjustifiable Hardship provisions is an area of concern to FNQTOA members.

Unjustifiable Hardship can be called on if a claim is made against an operator under the Act. However, an operator will not know whether they could justifiably rely on the unjustifiable hardship provisions until that time, when they might otherwise have had the opportunity to comply with the Standards if they knew it didn't apply at an earlier time.

Accordingly, an operator needs to obtain an exemption from the Standards if they are to have any certainty as to whether they are required to comply with the Standards or not. However, it may be that the only grounds for exemption are based on cost implications (unjustifiable hardship). Given that the Human Rights and Equal Opportunity Commission has ruled on a number of occasions that unjustifiable hardship is not a valid ground for an exemption from the Standards<sup>15</sup>, there is no way, in these circumstances, for operators to achieve the certainty they require.

They must then either, operate their business in the knowledge that they are risking being found to be unlawfully operating in breach of the Act and Standards, or shut up shop. Clearly this situation is not suitable for the proper operation of a business and clarification is required to enable operators, large and small, to continue to operate effectively in this area.

This uncertainty was acknowledged in the Regulation Impact Statement on Draft Disability Standards for Accessible Public Transport in 1999 (the "RIS"). Paragraph 6.9 of the RIS made recommendations on ways that this uncertainty could be alleviated for operators. These recommendations included:

- Amending the Act and the Standards to allow for the Human Rights and Equal Opportunity Commission to give an up-front exemption from the operation of a

<sup>15</sup> Referenced in decision of HREOC Re Infinity (Gold Coast) Pty Ltd 27 June 2000

provision of the Standards, and any corresponding provisions of the Act, on the basis that “unjustifiable hardship” or “equivalent access” applies in respect of particular circumstances; and/or

- Amending the Standards to provide for a schedule of optional best practice compliance methods – which would allow compliant models of buses and coaches to be developed and included in a schedule over time, which would be deemed to comply with the Standards.

To date none of the recommendations have been implemented, leaving operators in limbo as acknowledged by the RIS itself<sup>16</sup>.

## 11. SUMMARY AND RECOMMENDATIONS

In this submission, FNQTOA has advocated that amendments are needed to the Disability Standards for Accessible Public Transport 2002 to take into account the distinct operating environment and practical complexities FNQTOA members operate under.

Specifically, FNQTOA has demonstrated that:

- Demand for wheelchair accessible spaces in buses and coaches in the Far North Queensland region is very low.
- The facilities available at the various natural and other attractions that people visit our region for and the nature of many of the tours offered are such that it is not practical to modify conveyances to the level currently required under the Standards.
- Operational difficulties such as luggage space requirements, tight scheduling and lack of support staff in the field all restrict the viability of modifying conveyances to be wheel chair accessible.
- The cost of compliance with the Standards is prohibitively disproportionate to the level of demand for wheel chair accessible conveyances in the region.
- The reasoning behind the express exemption of limousines and hire cars from the Standards when originally introduced ought to apply equally to FNQTOA

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<sup>16</sup> Paragraph 6.9 of the RIS

members given the nature of their operations as pre-booked, discretionary recreational tour services.

- The lack of certainty provided by the current operation of the unjustifiable hardship provisions and inability to use economic hardship as a reason when applying for an exemption from the Standards has a profoundly negative impact on businesses.

In order to overcome these issues, FNQTOA has formulated a number of recommendations it believes ought to be implemented.

These recommendations are:

***Recommendation: #1***

***That regional land and marine tour operators be relieved (by whatever legislative device is appropriate) from the obligation to provide wheel chair access and dedicated spaces on conveyances predominantly used in conducting tours, especially those tours to destinations where the facilities or the activities there undertaken significantly limit or exclude the opportunity for participation.***

***Recommendation: #2***

***The requirements of the Standards should be reviewed and timeframes for compliance be extended to match the likely compliance of attractions. Where tours visit attractions that are in the adventure category, though the tours themselves may not be considered “adventure travel”, the vehicle should be exempt.***

***Recommendation: #3***

***The operation of the “adventure travel” exemption under the Standards needs to be clarified to ensure this incongruity is removed.***

***Recommendation # 4:***

***That a detailed study be undertaken to quantify the economic and social benefits/costs likely to be derived as a result of compliance versus exemption for regional land and marine tour operators, with a view to relaxing the requirements for compliance for that sector.***

**Recommendation # 5:**

***Additionally, Government funding or tax concessions to offset the cost of modifications to vehicles and the ongoing costs of operating the modified vehicles (both opportunity cost and maintenance) needs to be introduced given that most of the cross sector benefits stemming from compliance with the Standards will flow to Government and the Community sector as recognised in the Regulation Impact Statement on Draft Disability Standards for Accessible Public Transport 1999 (the “RIS”)<sup>17</sup>.***

**Recommendation: #6**

***The recommendations made in the RIS as a means of alleviating the uncertainty faced by operator, specifically the ability to utilise “unjustifiable hardship” for the purpose of getting an exemption from the Standards, or alternative mechanisms ought to be implemented to ensure operators are able to conduct their business with certainty regarding the applicability of the Standards to their operations.***

Finally, FNQTOA supports the objectives of the Disability Discrimination Act 1992 (the “Act”) and the Standards and the need to translate those objectives into action within all aspects of our community, but seeks recognition that the Standards as currently drafted do not reflect the reality of practical and economic considerations affecting tour operators in regional Far North Queensland.

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<sup>17</sup> See Paragraph 6.10 of the Regulation Impact Statement on Draft Disability Standards for Accessible Public Transport 1999.

## APPENDIX ONE

### Research Methodology

### The 20/20 Group Australia Pty Ltd



## Research Methodology

In obtaining FNQTOA's members' opinions for the purposes of this submission, The 20/20 Group formulated a list of questions in conjunction with FNQTOA's management committee. These questions, a copy of which is attached, were emailed to each member and then interviewed by The 20/20 Group 2 – 5 days later, once the members had had the opportunity to gather the relevant information together.

Members were advised that the information provided to The 20/20 Group would be kept confidential, particularly due to the commercial in confidence nature of the information amongst the members, many of whom are in direct competition with each other.

Interviews were conducted on a face to face basis, over the phone, or by the completion and return of the questionnaire, depending on availability of suitable representatives from each member.

The table below sets out the identity of the members consulted and the manner in which they were consulted.

Operator	Method of Interview
Billy Tea Bush Safaris	Face to Face
BTS Pty Ltd	Teleconference
Capta Group	Face to Face
Cooper Creek Wilderness	Teleconference
Dolphin Tours	Face to Face
Down Under Tours	Completed Questionnaire
Great Green Way Eco Tours	Teleconference
Heritage 4wd Safari Tours	Teleconference
Hostel Reef Trips	Face to Face
Hot Air Ballooning	Teleconference
Oz Tours Safaris	Face to Face
Quicksilver	Face to Face
Reef and Rainforest Connections	Completed Questionnaire
Skyrail	Teleconference
Tropical Horizons Tours	Completed Questionnaire
Tusa Dive	Completed Questionnaire
Wilderness Challenge	Face to Face
Wildlife Tropical Nth Qld	Teleconference

The remainder of FNQTOA's members were either unavailable for the interviews or had no information to provide as, in their view the Disability Standards did not relate to them, given that they considered they only carried out "adventure travel".

Interviews were conducted by advising members of the purpose of the interview and running through the questions and discussing each of them in turn. The 20/20 Group kept detailed notes of each interview and compiled the data into information for use in preparing this submission.

The list of questions provided to members was as follows:

- How Many Vehicles do you have?
- How many seats in each?
- How many currently comply with the standards?
- How much do you estimate it will cost (or did it cost) your business to comply with the standards?
- What is the difference in the cost of acquiring compliant vs. non-compliant vehicles?
- Have the costs of compliance been passed on to passengers? How much?
- How many seats in each vehicle will you lose in making them compliant?
- Has there been an increase in passenger numbers since making your vehicle compliant?
- How many passengers do you carry each year? (5 years data)?
- How many disabled passengers do you carry each year?
- How many enquiries do you get from disabled passengers?
- What procedures do you currently have in place to deal with disabled passengers?
- What proportion of your customers pre-book?
- Do the facilities that you visit otherwise have measures in place that provide for disabled customers (e.g. if your vehicles were compliant, would the venues you go to be able to adequately deal with your disabled passengers)?
- Details of your itineraries?

- What issues have you faced in aiming to comply (at least in part) with the standards?
- What constraints are there in providing compliant services (e.g. costs of vehicles / modifications, the supply of compliant vehicles – are they easy to obtain / modify, physical constraints in some vehicles, limited disability access at destination points, remote geographical operations, lack of support staff in remote locations)?
- Do the standards make what is required sufficiently clear?
- Have you undertaken any research regarding passenger needs and demands?
- Are there any other relevant issues that affect your business' ability to comply with the standards?

## APPENDIX TWO

### Quotes for Modifications



177  
163 Ingram Road,  
Acacia Ridge  
P.O. Box 2040  
Crestmead Q 4132  
Ph: (07) 3344 4544  
Fax: (07) 3344 4085

A.C.N 010 880 770  
A.B.N. 66 010 880 770

## Quotation

12226

Mr Gordon Dixon  
Down Under Tours Australia ( Cairns )  
P.O.Box 5670  
CAIRNS QLD 4870

Quote Date 10 Jul 2007  
Total Price\*\* \$39,610.00

ABN 66 010 880 770  
ACN 010 880 770

Client ID No. 81

### Job Specification (Vehicle Details)

Denning Coach

Job Item	Description	Price
1	RETRO FITTING OF WHEELCHAIR ACCESS SYSTEM - 2 wheelchair capacity  * Fitting of W' Chair access door to N/S of Coach * Fitting of lift stowage door to N/S skirt * Supply and fit "Ricon Baylift" lift system - Underfloor mounted * Fitting of W' Chair anchorage system * Fitting of "Quick release seat mounts to 4 X 2 pass seats - Wheelchair travel positions * Supply wheelchair restraint kits (2 sets) * Body frame modifications, bodywork, trim, electrics and painting of modified areas as necessary.  - Modified seating capacity 53 plus driver or 45 plus 2 W' Chair pass. plus driver - Original seating capacity 53 plus driver	39,000.00
2	ENGINEERING CERTIFICATION	610.00
3	G. S. T. (Exempt)	

This total price includes a GST of ~~\$3,600.00~~

**Total Price\*\* \$39,610.00**

\*\* Plus any listed "At Cost" Items

  
Evan Isaacs

This quote is valid for 14 days from the quote date. Errors & Omissions Excepted.



163 Ingram Road,  
Acacia Ridge  
P.O. Box 2040  
Crestmead Q 4132  
Ph: (07) 3344 4544  
Fax: (07) 3344 4085

A.C.N 010 880 770  
A.B.N. 66 010 880 770

## Quotation

12225

Mr Gordon Dixon  
Down Under Tours Australia ( Cairns )  
P.O.Box 5670  
CAIRNS QLD 4870

Quote Date 10 Jul 2007  
Total Price\*\* \$26,095.00

ABN 66 010 880 770  
ACN 010 880 770

Client ID No. 81

Job Specification (Vehicle Details)  
Toyota Coaster Bus

Job Item	Description	Price
1	RETRO FITTING OF WHEELCHAIR ACCESS SYSTEM - 2 Wheelchair capacity  * Fitting of access door to N/S rear of bus - Sealed, lockable and bonded window glass * Supply and fit "Braun Vista" Lift system - Internal mount in place of N/S rear 2 X 1 pass seating * Supply and fit "Quick release" wheelchair anchorage system * Modify O/S rear 2 X 2 pass seating to Quick release anchorage - Wheelchair travel positions * Supply wheel chair restraint kits (2 sets) * Fitting of safety handles and fixtures as required * Includes all bodywork, trim, electrics and paint as necessary  - Modified capacity 18 plus driver or 14 plus 2 W chair pass plus driver (Original capacity 20 plus driver)	25,485.00
2	ENGINEERING CERTIFICATION	610.00
3	G. S. T. (Exempt)	

This total price includes a GST of ~~\$2,272.37~~

**Total Price\*\* \$26,095.00**

\*\* Plus any listed "At Cost" Items

  
Evan Isaacs

This quote is valid for 14 days from the quote date. Errors & Omissions Excepted.



14<sup>TH</sup> August, 2007

Attention: Mr David Downey  
Coach Operations Manager  
Quicksilver Connections  
P.O. Box 171  
PORT DOUGLAS QLD 4871

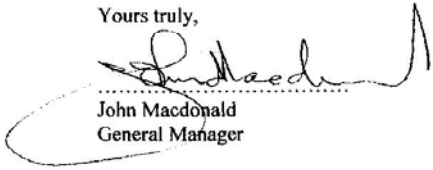
**Re: Retrofit of Wheelchair Access to Coaches**

Dear David,

In response to our recent discussions for the retrofitting of wheelchair access for your coach fleet I would estimate that the costs would be between \$25,000 and \$42,000 per unit for the 21 to 30 seat coaches and between \$50,000 and \$70,000 per unit for the 30 to 52 seater coaches.

The variables are wide ranging as the many different coach designs would demand implementation of individual engineering requirements. As a consequence these figures are, at best, an educated guess.

Yours truly,



John Macdonald  
General Manager

## APPENDIX THREE

### Tourism Queensland Fact Sheet

### “Disability Tourism” 2002





## DISABILITY TOURISM

*A disability is the functional consequence of an impairment (any loss or abnormality of psychological, physiological or anatomical structure or function). To be classified as a disability, limitations or restrictions to normal functioning must be likely to last for a period of at least 6 months.*

The number of Australians with a disability is on the increase, particularly as our population ages.

In 2002, Tourism Queensland conducted a review of current research to gain a better understanding of the disability tourism market. Specific objectives of conducting the review were to:

- Develop a market profile of the disability sector in Queensland;
- Provide information on what people with a disability are looking for in a tourism experience;
- Identify any product gaps; and
- Identify core issues that confront both the operation and development of tourism businesses targeting people with a disability.

### Market Insight

- In 1998, 3.6 million people in Australia had a disability (19% of the total population). A further 3.1 million had an impairment or long-term condition that did not restrict their everyday activities. Of those with a disability, 87% (3.2 million) experienced specific restrictions in core activities, schooling or employment.<sup>1</sup>
- In 1998, approximately one in five Queenslanders had a disability and just over one third of Queenslanders with a disability had a profound or severe activity restriction.<sup>2</sup>
- An estimated 3.7 million trips per year are taken by individuals with a physical disability, totalling to some 29.8 million nights.<sup>3</sup>
- The average size of travel group for people with a disability is 4.1 people.<sup>3</sup>
- There is a myth that the disability market does not spend because of income restraints. The disability market does have some income restraints but tends to travel on a level comparable with the rest of the population.<sup>4</sup>
- The total amount spent by all people with a disability on their last holiday adds to approximately \$472 million Australia wide.<sup>3</sup>

*Please note that all information pertaining to type of experience sought, activities, accommodation and length of experience pertains to Australian travellers only. No research is currently available on this for the international market.*

### Type of Experience Sought

Relaxing and a change from their regular routine are the key drivers to taking a holiday for people with disabilities. Visiting friends and relatives, to attend a sporting event and to sightsee are other key motivators to taking a holiday.<sup>5</sup>

### Specific Destination Requirements

- When evaluating whether or not to visit a destination, the following factors are assessed:
  - The overall accessibility of the destination
  - Presence of low gradients (flat)
  - Access to smooth walkways/paths (no stairs)
  - Accessibility of public transport (low floor buses, accessible train platforms and trains)
  - Things to do and see – and how accessible these are
  - Accessibility of dining and shopping outlets
  - Accessibility of attractions
  - Accessibility of pubs, bars and nightclubs (including the provision of accessible toilets)

- o Whether accessible accommodation is available
- o Availability of disability aids at the destination – eg: hire car facilities, taxi services, carers, equipment and supplies.

Each of these factors is important, however the best walkways, public transport and accessible accommodation is of little interest to people with disabilities if there is nothing to do and see at the destination.<sup>6</sup>

- Beachside destinations are visited but are generally less attractive to people with disabilities due to problems getting in and out of the water and moving around in the sand. Some also find the heat difficult to cope with and therefore find cooler hinterland areas more appealing than coastal areas.<sup>5</sup>
- "Newer" destinations, such as modern Australian capital cities (Perth and Adelaide are mentioned) are considered more accessible than older destinations where little to no attention has been paid to providing access (eg: some older parts of Sydney).<sup>5</sup>

### Activities<sup>5</sup>

Activities enjoyed and participated in by disabled tourists include:

- Relaxing/getting away from everyday routine
- Enjoying scenery/sight seeing
- Walking (rolling)
- Restaurants, cafes, bars, pubs (provided there are accessible toilets)
- Shopping (provided they can enter and move around the shop)
- Visiting theme parks and other tourist attractions (provided they can participate)
- Nature/national parks
- Fishing
- Sport
- Clubs, casinos
- Concerts and shows (with accessible seating where their partner or friend can sit with them).

### Accommodation<sup>5</sup>

The most popular forms of accommodation for wheelchair bound travellers are **hotels** and **motels**, followed closely by staying with **friends and relatives**. People with a disability who are not wheelchair bound are most likely to stay with friends and relatives, followed by hotels and motels.<sup>3</sup>

MAIN TYPE OF ACCOMMODATION	WHEELCHAIR %	OTHER %
	21.5	14.5
	18.5	15.5
	2.9	3.8
	7.3	5.6
	2.5	2.1
	28.4	42.0
	19.0	16.5

The booking process for accommodation by disabled persons varies:

- To ensure availability some will book up to 6 weeks in advance
- Some book just before arrival or wait until they arrive and can inspect the room (varies)
- Booking methods used include direct contact with accommodation provider, travel agent and the Internet (limited).

In order to secure a room that is truly accessible most travellers will source accommodation options listed as accessible and/or phone to investigate the actual level of accessibility of the room.

The following are some of the basic points that need to be considered when addressing accessibility:

#### Car Parking

- Have wide car parks, preferably undercover
- Ensure car parks are close to room or unit
- Allow for high clearance (necessary for the automatic lifting of wheelchairs)
- Ensure car parks are on a level service rather than a slope.

#### Access to the Unit/Room

- Ensure there are no stairs leading up to the front door of the room/unit
- Ensure level surface outside room door to enable access
- Ensure doorways are wide enough for wheelchair access.

#### Bathroom Access

- Equip toilets and showers with grab rails
- Provide shower seats
- Use non-slip surfaces
- Ensure doorways are wide enough for wheelchair access.

Many people with disabilities book their accommodation direct so accommodation providers need to be aware of the type and detail of information required by people with disabilities.

#### Transport<sup>5</sup>

Transport is a crucial component of travel for people with a physical disability. Much of the Australian public transport system has limited accessibility, significantly reducing transportation options for people with a physical disability

The most common form of transport used by people with disabilities is **driving their own car**. This is the most cost efficient and convenient as it provides transport that they can use once at their destination.

**Planes** are also used, and are generally considered to be relatively comfortable. On the smaller regional planes, however, people with disabilities often have problems with toilet access. The main reason people with disabilities do not fly more often or choose to drive rather than fly is *expense*. Driving is more cost efficient on two counts; driving is less expensive than an airfare, and also means that the traveller does not have the cost of hiring a vehicle or paying for taxis at the destination.

Catching the **train** (with some putting their car on the train) is also common with most modern trains being wheelchair accessible, and the railway staff being considered helpful.

Domestic Main Transport to Reach Destination<sup>3</sup>

TRANSPORT TO DESTINATION	ALL %	WHEELCHAIR %	OTHER %
Private or modified vehicle	15.9	16.8	14.2
Pedestrian access	3.7	2.5	5.9
Taxis or special purpose taxis	59.8	54.0	67.3
Buses/coaches	11.3	17.6	3.1
Hire vehicles	0.6	0.6	0.6
Boats	0.1	0.2	0.1
Other	5.1	3.4	7.5

Once at the destination, the range of transport options which may be accessed depends on the nature of the destination itself, location of accommodation, leisure activities, budget of the individual etc. Not surprisingly, 77% of people use a **private or modified vehicle**. The range of other transport used is varied, including **pedestrian access** ( 24%), **taxis** or special purpose taxis (11%), **buses/coaches** (8%), **hire vehicles** (5%) and **boats** (4%).<sup>3</sup>

#### Travel Party<sup>3</sup>

There is a myth that the disability market tends to travel in large groups and is therefore too difficult for the average establishment to cope with. The majority of people with physical disabilities actually travel

with between two to five people in their group. There is, however, a small percentage of groups sized seven people and over (8%), with group sizes extending up to 100.

On average, 80 to 90 percent of all travel by people with a disability is with a partner and/or carer and/or family and friends.

TRAVEL GROUP TYPE	ALL%	WHEELCHAIR %	OTHER %
	9.2	9.0	9.7
	27.9	27.6	27.6
	29.1	29.9	27.5
	18.7	17.0	21.4
	1.0	.8	1.1
	4.5	4.0	5.5
	.6	.3	1.0
	2.7	3.6	1.2
	3.5	3.8	3.6
	3.0	4.0	1.4

### Information Sources<sup>5</sup>

One of the biggest issues for people with disabilities in regards to tourism is securing accurate and reliable information about their accommodation. Many have been given inaccurate advice in the past and are therefore wary of publications for people with disabilities. To increase the credibility of publications, the following should be considered:

- A reference to the standard or definition applied to achieve the label "accessible"
- Applying the Australian Standard in assessing accessibility
- Using people with a disability to assess the area – and reference their involvement in the guide.

The types of information people with a disability may look for includes:

- Transport services
- Equipment suppliers (to assist in reducing the amount of equipment that needs to be transported to the destination)
- Personal care services (to assist those who need assistance either on a full time or part time basis – can provide cost savings if people don't have to pay for their own carer to travel with them)
- Infrastructure services
- Floor plans for accommodation options

This provision of this type of information is likely to encourage visitation or consideration of Queensland as a holiday destination.

People with a disability also look for the same types of information that people without a disability utilise when selecting holiday destinations, including:

- A description of the area – including local attractions, things to do and see, shopping and eating
- Pictures of scenery, tourist attractions, accommodation and people enjoying themselves
- Accommodation options
- Maps of the city area including details of toilets, shopping parking, libraries cinemas and parks.

### Demographic Profile

- The proportion of Australian males and females with a disability is similar (around 19%), however it varies across age groups. Males have similar or higher rates across all age groups except of those aged 80-84 years. In particular, disability rates for males are markedly higher for those who are young (0-14 years) or approaching older age (60-79 years).<sup>7</sup>
- In Queensland in 1998, there were 360,000 males and 326,700 females with disabilities. Males accounted for 52.4% of all people with disabilities and 52.7% of all people who were restricted by their disability. Males were also more likely than females to indicate they were not restricted by their disability, representing 50.8% of all people who were not restricted by their disability.<sup>8</sup>



People with a core activity restriction: Level of core activity restriction by age group, Queensland, 1998<sup>8</sup>

LEVEL OF CORE ACTIVITY RESTRICTION	0-4 YEARS	5-14 YEARS	15-24 YEARS	25-64 YEARS	65 & OVER	TOTAL **
*4000	28,500	11,700	99,100	84,700	227,900	
-	*3,600	7,600	74,800	41,500	127,500	
-	*4,900	11,100	84,900	69,400	170,500	
*4000	37,000	30,400	258,800	195,600	526,000	

\* subject to high sampling variability

\*\* totals may differ from the sum of components due to rounding

- In Queensland in 1998, an estimated 195,000 people with disabilities aged 15 to 64 years and living in households were employed and 36,200 people with disabilities were unemployed.<sup>8</sup>
- The median weekly income in Australia for people aged 15 to 64 years living in households was \$360 in 1999, but for those with a disability it was \$210. Within this group, people restricted by a sensory impairment averaged \$250 a week and those restricted by an intellectual impairment, \$170 per week.<sup>7</sup>
- In Queensland it was estimated, according to 1999 data, that 7% of people with disabilities lived in non-private dwellings such as hospitals, hostels and nursing homes.
- The other 93 percent of people with disabilities lived in private dwellings, with four out of every five living with other people.<sup>8</sup>

### Barriers<sup>5</sup>

- Perceptions of Queensland as having associations with the sun and the sand can be a negative for people with disabilities. Queensland has many desirable cooler and non-beach destinations and the promotion of such destinations would be particularly appealing to the disability tourism market.
- The following concerns apply specifically to air travel and may act as a barrier to people with a disability travelling by air:
  - No accessible toilets on smaller regional planes
  - Being pushed around without due care
  - Being seated too far away from toilets
  - Being left in the airline's temporary wheelchair
  - The handling of their own wheelchair
  - Delay getting their wheelchair back after the flight has landed
  - Wheelchair failing to arrive at the destination.
- For interstate people, particularly Victorian, South Australian and Western Australian residents, the distance to travel to Queensland is often too far to drive. Flying is therefore the best option, and whilst flying itself is not necessarily a barrier, cost is. This includes not only the cost of airfare, but also transport once at the destination. For those travelling with carers, the costs are doubled, as the carer's fare, accommodation and meals must also be provided.
- Most people with a disability say that they have had to pay a premium to stay in accommodation that is set-up for people with disabilities. They have experienced room rates that are more expensive than the standard room rates, often because the accessible room is classed as a "suite". This is considered to be discriminatory.
- Many people with disabilities are on relatively low incomes, which can make cost a barrier to travel.

### Opportunities

- The demographics of Australia are changing. We have an ageing population that is increasingly affected by disabilities. These people are retiring at a younger age and living longer. They are not necessarily wheelchair bound and want to enjoy life to the maximum despite their physical restriction.<sup>3</sup>

- The majority of Australia's inbound markets are sourced from nations with ageing populations.<sup>3</sup>
- Providing accessible tourism facilities and services opens the door to a large and growing market. While wheelchair users appear to comprise of a small number of the overall people with a disability, design and planning that incorporates the needs of this group will be good design and planning for other markets. Effectively many people will benefit from these provisions including the ageing population, parents with prams, and employees as it incorporates good design practice for a range of occupational health and safety requirements.<sup>3</sup>
- Queensland has a great range of accessible tourism product, but the problem has been getting information about it to people who need it. Tourism Queensland has a very comprehensive guide for disabled tourists in the Accessible Queensland publication which includes information on a range of services such as equipment hire, personal care, transport and infrastructure. Information is listed by region and maps are included.<sup>5</sup>

### **Marketing Tools<sup>5</sup>**

- The promotion of accessible attractions that people with disabilities can actively participate in is essential in order to capture the disability tourism market.
- Reliability or accuracy of the information about accommodation is of utmost importance to people with disabilities. Many have experienced being given inaccurate advice in the past and are therefore wary of publications for people with disabilities. Ways to increase the credibility of publications include:
  - Referencing the standard or definition applied to achieve the label "accessible"
  - Applying the Australian Standard in assessing accessibility
  - Using people with a disability to assess the area – and reference their involvement in the guide.
- Packages that include transport and accommodation and perhaps some entry to attractions are appealing to people with a disability.
- The inclusion of transfers or hire cars at reduced rates is also appealing.
- When developing packages it is essential that they be priced at the mid or budget end of the market.
- Ensuring that people with a disability are not charged a premium for staying in accessible accommodation could assist in creating good will and help attract people with a disability to an establishment.
- Consider advertising in a guide specifically tailored for travellers with a disability, such as:
  - Accessible Queensland Guide
  - ATB Toowoomba Guide
  - Access Friendly Noosa
  - Easy Access Australia
  - The Wheelie's Handbook of Australia

### **Other Considerations<sup>3</sup>**

The following access issues need to be considered for operators catering to the disability tourism market.

#### **Physical Access**

Physical access involves those people with mobility disabilities who require the use of a wheelchair or walking aids. They require the provision of paths, ramps, lifts, handrails, clear directional signs, kerb cuts, circulation room, wide doorways, lowered counters and telephones etc.

#### **Sensory Access**

Sensory access involves those people with hearing or sight disabilities. They require the provision of tactile signs and labels, tactile markings or visual cues at changes in levels of flooring, audio cues for lifts and lights, and hearing augmentation-listening systems etc.

### **Communication Access**

Communication access involves those people who have difficulty with the written word, a vision, speech or hearing impairment or who are from other cultures. They may require the provision of TTY (telephone typewriters), access to information in a variety of media, non-verbal signs or posters in plain English documentation or in other community languages for example.

- 
- <sup>1</sup> Disability, Ageing and Carers, Summary of Findings 1999.  
<sup>2</sup> One in Five Queenslanders has a Disability, 1999 (www.abs.gov.au - April 2002)  
<sup>3</sup> Tourism and People with Physical Disabilities, Simon Darcy, May 1998.  
<sup>4</sup> www.mangolagoon.com.au - April 2002  
<sup>5</sup> People with Disabilities – A Market Research Report, MCR, December 2001.  
<sup>6</sup> Disability Focus Groups Research Report, MCR, December 2001.  
<sup>7</sup> Disability, Ageing and Carers, Summary of Findings 1999 (www.abs.gov.au)  
<sup>8</sup> www.disability.qld.gov.au/publications/profile99.pdf - April 2002  
<sup>9</sup> Tourists with Disabilities - A Target Market  
(www.tq.com.au/issue04/1news/n08a.htm - April 2002).

### **Further Information**

#### **Research Department**

**Tourism Queensland**

**Ph: (07) 3535 5420**

**Fax: (07) 3535 5329**

**Email: [research@tq.com.au](mailto:research@tq.com.au)**

**Or visit our website at: [www.tq.com.au/research](http://www.tq.com.au/research)**

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