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Assistive Technology Suppliers Australasia Inc

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### **2012 Review of the Disability Standards for Accessible Public Transport (Transport Standards)**

Assistive Technology Suppliers Australasia Inc (ATSA) is an industry association representing the views of organisations who supply assistive technology (AT) throughout Australia. Our members manufacture, import, distribute, retail, hire and service a wide range of AT including mobility devices such as wheelchairs (both manual and electric) and other motorised mobility devices such as scooters.

The Issues Paper released in November 2012 highlights the importance of accessible public transport for Australians with disability. Recommendation 5 (page 20) suggests -

- *A mobility labelling scheme be developed which identifies the weight of the aid and whether its dimensions fit within the dimensions for allocated spaces, boarding devices, access paths and manoeuvring areas on conveyances, as specified in the Transport Standards.*

The new Australian Wheelchair Standard AS/NZS3695 includes the requirement for a label that includes major dimensional details on a particular device. This standard is consistent with international standards and will therefore be widely adopted by AT suppliers. It is questionable if there will be any real benefit of additional labelling, specific to Australia, which will come at a heavy cost.

There are also some significant issues related to the implementation of an additional labelling scheme as per Recommendation 5 and it's effectiveness.

1. **Device Weight** - The weight of the mobility device is simply one factor that contributes to the total weight that infrastructure such as ramps and tie-downs are required to accommodate. It is common for an electric wheelchair with batteries to weigh more than 140kgs before additional items such as seating, accessories and personal items are added. The weight of the user then must be taken into account and could well result in a total weight well in excess of 300kgs. A label that declares the device is 140kgs is consequently meaningless and likely to be misleading.
2. **Customisation** – An AT supplier may be able to certify a mobility device’s dimensions and weight at point of sale. However many devices undergo extensive modifications by third parties at specialist clinics and organisations such as Technical Aid for the Disabled. These modifications could make the device unsuitable for use in public transport and render useless any declaration or label affixed at point of sale.
3. **Confusion with Importation Regulations** – At a recent AustRoads workshop in Brisbane, a panel of experts discussed at length the issue of motorised mobility devices (MMDs) within the context of the Australian Road Rules. There was a suggestion that MMDs should comply with accessible public transport standards (and be labelled as such) as a precondition for import. This would impose severe restrictions on the choice of MMDs for Australians with disability and have significant impacts on outcomes such as independence, safety etc. It should be noted that not all users of MMDs choose to use public transport.
4. **Pre-sale Consumer Information** – There is a strong argument that consumers should be made aware of public transport access standards prior to purchasing a mobility device to ensure their choice is well informed. This could easily be done by enhancing the ACCC’s guide “Help cut mobility scooters accidents” so that it was applicable to both motorised wheelchairs and scooters, and included additional information on public transport access standards. This guide is already widely circulated by AT suppliers.

In order to be effective, a labelling scheme can only be administered by an independent authority who reviews a device after it has been fully customised to suit the individual. An example of this is the Wheelchair Passport or PAS Scheme operating in the United Kingdom -

[www.unwin-safety.com/news/16/unwin-present-bsi-wheelchair-passport-scheme/](http://www.unwin-safety.com/news/16/unwin-present-bsi-wheelchair-passport-scheme/)

The presentations tab on the lower left side of the webpage links to a summary of the scheme. In the UK this scheme does not apply to public transport, however there is no obvious reason why it could not be extended to do so.

ATSA is committed to supporting the Department in working to deliver better public transport outcomes for people with disability and would welcome further dialogue on this important issue.

Yours sincerely,



Chris Sparks  
Executive Officer