



**Austroads Ltd**  
Level 9, 287 Elizabeth Street  
Sydney NSW 2000 Australia  
Tel: +61 2 8265 3300  
[austroads@austrroads.com.au](mailto:austroads@austrroads.com.au)  
[www.austrroads.com.au](http://www.austrroads.com.au)

## Document Review Form

Please send your submissions by email to [MMD\\_Consultation@tmr.qld.gov.au](mailto:MMD_Consultation@tmr.qld.gov.au)

**Project No.:** Austroads Project SRL6218: A Nationally Consistent Framework for Motorised Mobility Devices

**Reviewed Document:** Motorised Mobility Devices Discussion Paper

**Author:** Sona Trivedi-Ginn, Queensland Department of Transport and Main Roads

**Date circulated for comment:** 16 August 2019

**Due date for comment:** 16 September 2019

**Reviewer:** <Please enter name and organisation>

#	Section	Comment	Authors response
1	4.3 Option 3	We strongly support - See below	
2			
3			
4	4.3 Option 4	We are strongly opposed to Option 4	
5			
6			
3			
5			
6			
7			
8			
9			
10			

### Section 4.3 Option 3

Spinal Life strongly supports Option 3 – Industry driven adoption of the Technical Specification.

The MMD industry, particularly suppliers, has experienced operators who are the first to see, understand, assess and test product on behalf of consumers – and who accumulate knowledge about manufacturer's approaches to quality of materials and safe, user friendly, intuitive design. Hence, their capability to make decisions and provide information in accordance with the Technical Specification.

We place great emphasis on the success of Guidance materials to be developed for transport operators, allied health professionals and consumers. Austroads might consider a Co-design process that would include representatives from allied health professionals and customers with lived experience. Spinal Life has been part of the disability sector since 1960 and we know people with a disability place enormous faith in allied health professionals for equipment decision making.

Austroads might further consider including disability, aged and medical condition service providers for Guidance materials because generally these groups have the capability and the interest to support their members/clients about equipment which is so critical to people's capacity to be 'included' within community. For example, they would advocate their members support retailers who are participating in the TS (and that is market forces at work and a powerful counter to the Cons dot point 3). It would also ensure these consumer groups were exposed to and influenced by Austroads materials rather than the voluminous trafficking of thoughts presented as fact by individuals using the internet and social media. Few government agencies and businesses realise the extent and impact of this media. Sector organisations in Human services see it because their members/clients use it to transmit Good experience, Bad experience.

Re Cons dot point 2 *Australian Consumer Law*:

It is legislation not known that widely by consumers and it is appreciated that you have said some consider it to be an ineffective mechanism. Question: can a more appropriate law be canvassed with say, the Queensland Law Society.

Re Pros dot point 3 *There is no formal requirement to have a device labelled in order to access public infrastructure or public transport*

We make two points about this:

1.  
See the attached research data on accessible tourism and its \$10.8 billion contribution to the Australian visitor economy – and see the sheer weight of visitor numbers to capital and regional cities compared to resident population, which goes to your point about visitors.
2.  
Our greatest concern is that transport providers/staffs will seek to deny access to public transport due to label colour. We are aware of circumstances where a mobility device user can easily access ferries and trains but may struggle to get through the wheel arches of a bus but can do so with a bit of manoeuvring, however, the bus driver denies the customer access to board because they look at the mobility device and deem their route timetable will be impacted if they accept carriage of the customer. It happens now without labels, hence our concern. We are of the view that the user is not to blame: rather the blame is with the poor bus design and the poor transport standard that permitted the outcome.

### Section 4.3 Option 4

Spinal Life is strongly opposed to Option 4 – Regulatory prescription of the Technical Specification.

Our greatest concern is that transport providers/staffs will seek to deny access to public transport due to label colour.