

15 August 2022

The Director
Disability and Transport Standards
Land Transport Policy
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
Canberra ACT 2601

Via Email: DisabilityTransport@infrastructure.gov.au

To Whom it May Concern,

Reform of the Disability Standards for Accessible Public Transport: Stage 2 Consultation Regulation Impact Statement Summary

I am writing today in response to the Consultation Regulatory Impact Statement (CRIS) from the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department) on proposed reforms to the Disability Standards for Accessible Public Transport (DSAPT).

The AAA represents the interests of more than 340 airports and aerodromes Australia wide – from the landing strips in remote communities to major international gateway airports. There are a further 150 corporate members representing aviation stakeholders and organisations providing goods and services to the airport sector.

Regarding the 54 Stage 2 reform areas being examined under the CRIS, the AAA makes the following comments on the following areas relevant to airports covered under the DSAPT, i.e., airports that accept Regular Public Transport (RPT) services:

General Comments

The airport sector and aviation more broadly is one of the most heavily regulated parts of the Australian economy, with growing compliance requirements in areas including transport, aviation security, critical infrastructure security, economic and safety regulation. The AAA supports non-regulatory solutions put forward in the CRIS to improve accessibility to airports under the proposed reforms.

Reporting and compliance (1-4)

The AAA does not support the Australian Government setting requirements for airports to undertake additional compliance reporting on the DSAPT. This would provide an additional compliance cost and burden to airports, particularly smaller RPT airports owned by local government which are still recovering from the financial impacts of the pandemic.

It does support communicating the accessibility of airports to the public through airport websites and the use of equivalent access solutions where accessibility is not reduced.

Signs, symbols, braille and raised lettering (14-21)

The AAA generally supports proposed non-regulatory reforms to improve the types, locations and illumination of signs, symbols, braille and raised lettering at airports.

Information and communication technology (ICT) and fare systems (19-21)

This area falls between the division of responsibilities of airports as the infrastructure owner/manager and airlines as owners of check-in systems. The AAA supports greater accessibility for check-in and bag drop system systems, but airports will need to work closely with airlines and equipment suppliers to deliver the right outcome for accessibility of ICT and fare payment systems in airport terminals.

Lifts and travelators (25-26)

The AAA broadly supports non-regulatory reforms at airports to lifts, escalators and travelators, given sufficient time for replacement of any non-compliant assets at the end of their design life.

Toilets, taxi ranks, loading zones and parking spaces (39-44)

The AAA is supportive of non-regulatory reforms to provision of accessible toilets, taxi ranks and parking spaces at airport given sufficient time is provided for non-compliant assets to be upgraded or replaced in the regular infrastructure investment cycle at airports, either at the end of their design life or when a major upgrade occurs.

Information and communication (45-52)

The AAA supports non-regulatory reforms to improve customer information and communication at airports across print, audio, electronic and mobile systems, given these can be delivered relatively easily and rapidly to improve the experience for many airport users.

Lighting (53-54)

The AAA is supportive of non-regulatory reforms that modernise requirements for lighting, including luminance and contrast.

Other Considerations

At the foundation of the DSAPT in the 1990s, access for people with hidden disabilities were not necessarily considered to the same extent as those with physical disabilities. Discussions with airport and other stakeholders indicate the potential for improving accessibility for some people with disabilities under the DSAPT reforms may have the unintended consequences of reducing accessibility for people with 'hidden' cognitive and neurological disabilities. This interaction should also be considered in the broader context of accessibility for people of all abilities to Australia's public transport network.

The AAA would welcome the consideration of non-regulatory guidance to the public transport industry improved accessibility for travellers with hidden disabilities. Airports have shown great initiative in ensuring their facilities are inclusive environments for all users. Provision of specific guidance for creating inclusive environments for those with hidden disabilities would assist airports in delivering a consistent and inclusive national airport network.

Concluding remarks

Even though non-regulatory reforms come at a lower implementation cost than regulatory-based reforms, the airport sector will still bear significant compliance costs at RPT airports, particularly at low-volume regional RPT airports. Compared with urban and regional public transport systems, the quantum of compliance costs for aviation is relatively unknown.

Therefore, it is recommended the Australian Government supports the AAA to better understand the sector's costs for implementation of treatments to reach and maintain compliance with the DSAPT at RPT airports.

Should you have any questions regarding this submission, please contact the AAA's Director of Policy and Advocacy, Scott Martin via telephone on 0437285739 or via email at: smartin@airports.asn.au.

Yours sincerely

James Goodwin
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