



PEOPLE WITH DISABILITY
AUSTRALIA

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Reform of the Disability Standards for Accessible Public Transport 2002

Submission to the Department of Infrastructure, Transport
Regional Development, Communications, Sport & the Arts

**NOVEMBER
2025**

Copyright information

Reform of the Disability Standards for Accessible Public Transport 2002 (Transport Standards)– Submission to the Department of Infrastructure, Transport Regional Development, Communications, Sport & the Arts.

First published in 2025 by People with Disability Australia Ltd.
Level 10, 300 Elizabeth Street, Surry Hills, New South Wales, Australia 2010
Head office also in Sydney
Email: pwda@pwd.org.au
Phone: +61 2 9370 3100 Fax: +61 2 9318 1372
URL: www.pwd.org.au

Typeset in Arial 12 and 14 pt and VAG Rounded 26 pt

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National Library of Australia Cataloguing-in-Publication data:

Creator(s): Bastien Wallace

Title:

Reform of the Disability Standards for Accessible Public Transport 2002
(Transport Standards)– Submission to the Department of Infrastructure,
Transport Regional Development, Communications, Sport & the Arts.

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Suggested citation: EXAMPLE BELOW

Wallace, B., Reform of the Disability Standards for Accessible Public Transport 2002
(Transport Standards)– Submission to the Department of Infrastructure, Transport

Regional Development, Communications, Sport & the Arts, 20 November 2025, People with Disability Australia, Sydney.

About PWDA

People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

We have a vision of a socially just, accessible and inclusive community in which the contribution, potential and diversity of people with disability are not only recognised and respected but also celebrated.

PWDA was established in 1981, during the International Year of Disabled Persons.

We are a peak, non-profit, non-government organisation that represents the interests of people with all kinds of disability.

We also represent people with disability at the United Nations, particularly in relation to the United Nations Convention on the Rights of Persons with Disabilities (CRPD).

Our work is grounded in a human rights framework that recognises the CRPD and related mechanisms as fundamental tools for advancing the rights of people with disability.

PWDA is a member of Disabled People's Organisations Australia (DPO Australia), along with the First People's Disability Network, National Ethnic Disability Alliance and Women with Disabilities Australia.

DPOs collectively form a disability rights movement that places people with disability at the centre of decision-making in all aspects of our lives.

'Nothing About Us, Without Us' is the motto of Disabled Peoples' International.

Table of Contents

	1
Reform of the Disability Standards for Accessible Public Transport 2002	1
Submission to the Department of Infrastructure, Transport Regional Development, Communications, Sport & the Arts	1
Copyright information	2
About PWDA	3
Introduction	5
Recommendations	6
Discussion	7
Evaluation of reforms	10
Stage 1 reform areas	10
Stage 2 reform areas	14
Conclusion	30

Introduction

Public transport provides an essential connection for people with disability to education, work, healthcare, essential services and the community. The [Disability Standards for Accessible Public Transport 2002 \(Transport Standards\)](#) were introduced to provide certainty to operators and providers of public transport services about their responsibilities under the *Disability Discrimination Act 1992*.

In the 23 years since then public transport technology and usage has changed, so the standards need updating. Of the 5 identified reform areas, based on the expertise available to us, People with Disability Australia (PWDA) contributed to three working groups: Removable Gangways (reform area 42), Point-to-point Transport (reform area 3), and Reporting (reform area 1). Our peer Disability Representative Organisations (DROs) contributed to the other 2 areas: Braille (reform areas 15 and 16), Hearing augmentation (reform areas 9 and 10).

Transport systems their infrastructure and interdependencies are complex and technical. This work required many hours of reading, detailed engagement, discussion, reflection, and at times compromise. PWDA would like to acknowledge the hard work, dedication and commitment of people with disability who shared their lived experience of accessing public transport, and their recommendations for changes that would improve accessibility for everyone.

We support the work done at parts 1-31 of the [Draft - Disability Standards for Accessible Public Transport Guidelines 2025](#) to articulate how the standards should be applied.

Where problems arise is when the obligation to comply is limited, optional or pushed to the distant future. The evidence over 23 years is that making transport accessibility requirements optional, or providing excuses for non-compliance, entrenches the exclusion of people with disability.

Recommendations

Based on our evaluation of reforms, and our experience of the co-design process involved in the Disability Aviation Standards we make the following recommendations

Recommendation 1 – Accelerate straightforward changes

Recommendation 2 – Regulate identified safety issues rather than making them optional

Recommendation 3 – Co-design solutions with people with disability

Recommendation 4 – Regulate and audit identified issues to achieve compliance

Discussion

In the below Evaluation of Reforms section, each item has either been endorsed or a recommendation for reform provided. In reviewing the [Draft - Disability Standards for Accessible Public Transport Guidelines 2025](#) Parts 2 – 31 do an excellent job of providing guidance on interpreting and complying with the Transport Standards. It is important to provide clarity to transport providers.

However, 5-to-10-year timescales for many items that are low cost and relatively easy to change are too long. Wherever this is the case, a recommended timeframe has been provided.

The application of the guidelines to ‘new and substantially refurbished/ upgraded’ infrastructure or assets could have the perverse impact of disincentivising upgrades. In some cases, we have recommended the guidelines be applied to all assets.

We have also recommended some reforms be mandated or accelerated. This is because in spite of the [Draft - Disability Standards for Accessible Public Transport Guidelines 2025](#) (Guidelines) Part 1.2 (3) stating:

“The Transport Standards prescribe national requirements for public transport operators and providers to meet their obligations under the Act. The Act makes it unlawful for any person to contravene the Transport Standards.”

The fact is that many parts of the public transport system remain inaccessible and contravene the Transport Standards.

In part, this is because it is expensive and time-consuming for a person with disability to try to take action over an exclusionary feature, and also because transport operators are allowed to avoid completing the upgrades or changes necessary to provide accessibility.

Part 33.6 [Guidelines](#) spells out the fundamental problem:

“Non-compliance due to unjustifiable hardship

(1) The Transport Standards recognise there may be limitations to an operator or provider being able to comply with the Transport Standards, for example due to constraints that are part of the safe and effective operation of public transport services or due to exceptional geographical factors affecting the ability to comply with certain requirements.

(2) The Transport Standards recognises that an operator or provider need not comply with the provisions of the Act if it is proved that the operator or provider will be exposed to unjustifiable hardship.

(3) The definition of ***unjustifiable hardship*** that appears in the Transport Standards is based on the definition in the Act. If this definition expands on the definition in the Act, it should be considered as being in addition to and, to the extent possible, consistent with the definition in that Act.”

PWDA has participated in consultations related to the exceptional geographical factors described above. This has included the need to place a bus stop in an area where the only available sites have a gradient that normally would be unacceptable, due to the natural topography of the streetscape.

We accept that in some limited cases features of the landscape, water, or weather conditions will be unable to be modified to achieve compliance. For example, a ramp to a ferry wharf that is normally compliant may become too steep for an hour at low tide when the pontoon drops.

However, in other cases unjustifiable hardship’ is used to excuse a transport operator, or agency responsible for accessible infrastructure that does not wish to spend money on relatively easy changes. No mention is made of the hardship caused to a person with disability who has no accessible way to travel to healthcare, education, work or to see family because the local transport infrastructure or service is inaccessible.

Whilst it is possible for a person under the [Guidelines](#) S33.10 to take their complaint to the Human Rights Commission to ensure compliance with the Transport Standards, in practice this is expensive, time-consuming and impractical. It places the burden of trying to achieve

accessibility on the person with disability, and it is clear from the many examples of inaccessibility in transport systems all over Australia that this has not worked.

Rather than allowing transport operators to set barriers and reduce the pace of change, PWDA recommends the co-design process being used currently to develop the Disability Aviation Standards. We appreciate that some reform elements have been identified as needing further working groups. For those we recommend a similar structure to the one used by the Federal Department of Infrastructure for the Aviation co-design.

People with disability have had lifetimes of problem-solving and have excellent insights into the changes that are most needed. When their lived experiences are allowed to shape recommendations for change, separate from the voices of industry advocating for the status quo, the outcomes are excellent.

Finally, the structure of the guidelines and the overall regulation of public transport in Australia does nothing to incentivise the development of more accessible public transport. For most of rural and regional Australia there is no accessible public transport, and we need programs that incentivise its development where it currently does not exist.

Evaluation of reforms

A summary of reform areas, agreed options and implementation arrangements is extracted below from www.infrastructure.gov.au/transport-standards-reform. In the final column, endorsement or recommendations for change have been provided.

Stage 1 reform areas

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
1	Staff training and communication	Requirements to conduct disability awareness training to meet the specific roles and responsibilities of staff.	Regulatory	Existing and new assets – 5 year set timeframe	Change to 2 year set timeframe
2	Mobility aid safety	Guidance for mobility aid designers to improve the safety of mobility aids on conveyances.	Non-regulatory	The Whole Journey Guide	Endorsed
3	Priority seating	Requirements regarding the quantity, location and identification of priority seats.	Regulatory	Existing and new assets – 5 year set timeframe	Change to 2 year set timeframe

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
4	Allocated spaces	Requirements regarding the dimensions, location and usage of allocated spaces, including related access paths and manoeuvring areas in public transport vehicles.	Regulatory, sub-option 3	New and substantially refurbished/upgraded assets	Endorsed
5	Digital information screens	Requirements regarding the location, luminance contrast and polarization requirements for digital screens.	Regulatory	New and substantially refurbished/upgraded assets	Endorsed
6	Lifts	Stage 1, reform area 6 Lifts is superseded by Stage 2, reform areas 34 and 18.	N/A – covered in Stage 2	N/A	Endorsed
7	Website accessibility	Setting accessibility (WCAG) requirements for websites	Regulatory, sub-option 3	New and substantially refurbished/upgraded assets	Recommend for all digital assets within 2 years

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
8	Communication during service disruption	Requirements to communicate the details of the disruption and alternate travel options in a variety of formats.	Regulatory	Existing and new assets – 5 year set timeframe	Change to 2 year set timeframe
9	Gangways	Requiring regarding maximum gradients to suit tidal environments.	Regulatory	New and substantially refurbished/upgraded assets	Endorsed
10	Assistance animal toileting facilities	Guidance on the location, design and information provision for assistance animal toileting facilities.	Non-regulatory	The Whole Journey Guide	Endorsed
11	Emergency egress	Guidance on emergency egress related to public transport infrastructure.	Non-regulatory	The Whole Journey Guide	Must be audited and regulated within 2 years
12	Fit for purpose accessways	Guidance on ensuring accessways are fit for purpose including (but not limited to) universal	Non-regulatory	The Whole Journey Guide	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
		design principles, continuous accessibility and anticipating future demand.			
13	Wayfinding	Requirements regarding luminance contrast of objects, tactical ground surface indicator usage and braille and tactile sign installation.	Regulatory	Existing and new assets – 10 year set timeframe	Change to 2 year set timeframe
14	Tactile ground surface indicators (TGSIs)	Design requirements for directional tactile ground surface indicators.	Regulatory	Existing and new assets – 10 year set timeframe	Change to 2 year set timeframe
15	Passenger loading zones	Requirements for the first and last vehicle space to be accessible in a passenger loading zone in a public transport site.	Regulatory, sub-option 2	Existing and new assets – 10 year set timeframe	Change to 2 year set timeframe
16	Provision of information in multiple formats	Require that online information is not the sole means of	Regulatory	Existing and new assets – 5 year set timeframe	Change to 2 year set timeframe

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
		providing information.			
17	Australian Standards and definitional amendments	The Transport Standards will be updated to reference all 32 relevant Australian Standards.	Regulatory	Other (refer to implementation chapter in Decision RIS).	Endorsed

Stage 2 reform areas

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
1	Reporting	Guidance to encourage operators and providers to develop and publish plans on how they are meeting and progressing towards compliance with the Transport Standards. A working group will be established to develop the reporting framework.	Non-regulatory	Standalone guidance	Must be regulatory and required within 2 years
2	Equivalent Access	A web-based centralised	Non-regulatory	Standalone guidance	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
		repository of equivalent access solutions (i.e. examples).			
3	Rideshare	A working group will be established to undertake a holistic review of the point-to-point transport, including rideshare, industry to determine the scope of the problem.	Status quo	N/A	Co-design by people with disability of suitable accessibility solutions to occur before industry input – similar to aviation
4	Dedicated school buses	Further work to be undertaken to understand the scale of the problem.	Status quo	N/A	Co-design by children with disability and their caregivers of suitable accessibility solutions to occur before industry input – similar to aviation
5	Better communication of accessibility features	Requirements to define accessibility terminology used by the operator and communicate accessibility features of public transport	Regulatory	Existing and new assets – 5 year set timeframe	Change to 2 year set timeframe

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
		premises and vehicles.			
6	Timely provision of information	Requirements that information in infrequently requested formats (e.g. large print) must be provided in a timely manner if not immediately available.	Regulatory	Existing and new assets – 5 year set timeframe	Change to 2 year set timeframe
7	Real time communication	Guidance to encourage operators and providers of public transport to improve real time communication with passengers.	Non-regulatory	The Whole Journey Guide	Endorsed
8	Passenger location during journey	Requirement that passengers are informed of where they are during a journey.	Regulatory, sub-option 1	New and substantially refurbished/upgraded assets	Endorsed
9	Hearing augmentation on conveyances	A working group will be established to consider the feasibility of installing hearing augmentation	Status quo	N/A	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
		systems in public transport operating environments and the viability of emerging digital solutions.			
10	Hearing augmentation: Infrastructure on premises	A working group will be established to consider the feasibility of installing hearing augmentation systems in public transport operating environments and the viability of emerging digital solutions.	Status quo	N/A	Endorsed
11	Print size and format	Requirements regarding print size, format and contrast for documents.	Regulatory	New and substantially refurbished/upgraded assets	All assets within 2 years
12	International Symbol for Access and Deafness	Size requirements for the international symbol for accessibility and deafness on signs.	Regulatory sub-option 2	New and substantially refurbished/upgraded assets	All assets within 2 years

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
13	Letter heights and luminance contrast of signs	Size requirements for the international symbol for accessibility and deafness on signs.	Regulatory option 2, sub-option 2	New and substantially refurbished/upgraded assets	All assets within 2 years
14	Location of signs	Requirements for sign location.	Regulatory, sub-option 2	New and substantially refurbished/upgraded assets	All assets within 2 years
15	Braille embossed (printed) specifications	Requirements for the standard of braille to be used on printed formats. A working group will be established to determine final technical specifications.	Regulatory in-principle	Existing and new assets – 5 year set timeframe	Change to 2 year set timeframe
16	Braille and tactile lettering for signage	Requirements for braille and tactile sign design. A working group will be established to determine final technical specifications.	Regulatory in-principle	New and substantially refurbished/upgraded assets	All assets within 2 years
17	Lifts - Braille and tactile	Requirements for lift landings to have braille and tactile	Regulatory	Existing and new assets – 5 year set timeframe	All assets within 2 years

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
	lettering for signage	signs identifying the platform landing.			
18	Lifts- Audible wayfinding	Requirements that lift cars must deliver audible wayfinding announcements.	Regulatory, option 2	New and substantially refurbished/upgraded assets	All assets within 2 years
19	Lifts- Emergency communication systems in lift cars	Requirements for hearing and speech impaired passengers to be able to communicate from a lift in an emergency.	Regulatory	New and substantially refurbished/upgraded assets	All assets within 2 years
20	Lifts - Reference for lift car communication and information system	Guidance on best practice accessible lift car communication and information systems.	Non-regulatory	The Whole Journey Guide	Endorsed
21	Information and communication technologies (ICT) procurement	Accessibility requirements for ICT procurement.	Regulatory, option 1	New and substantially refurbished/upgraded assets	Endorsed
22	Mobile web systems	Require that all information provided by an operator or provider must meet	Regulatory, option 1	New and substantially refurbished/upgraded assets	All assets within 2 years

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
		minimum technical (WCAG) specifications.			
23	Accessible fare system elements	Accessibility requirements for the use of fare system elements (e.g. ticketing machines).	Regulatory option 2, sub-option 2	New and substantially refurbished/upgraded assets	Endorsed
24	Doors on access paths	Requirements that unisex accessible toilet doors on trains must be power assisted.	Regulatory, option 2	New and substantially refurbished/upgraded assets	Endorsed
25	Continuous access on access paths	Requirements that access paths must allow for continuous access.	Regulatory	On commencement	Endorsed
26	Flange gaps within access paths	Guidance to minimise the flange gap and encourage good design and safe traversing of flange gaps.	Non-regulatory	The Whole Journey Guide	Needs to be regulated and required to conform ASAP as failure to do so is hazardous
27	Resting points	Requirements for resting points on long access paths.	Regulatory	Existing and new assets – 5 year set timeframe	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
28	Requirements for handrails in overbridges and subways	Requirements that bridges and subways must have continuous handrails except in specified situations.	Regulatory	New and substantially refurbished/upgraded assets	Endorsed
29	Location of fare system elements	Accessibility requirements for the location of fare system elements (e.g. ticket machines).	Regulatory	New and substantially refurbished/upgraded assets	Endorsed
30	Allocated spaces and priority seating in waiting areas	Requirements for the number of allocated spaces and priority seats in waiting areas	Regulatory	Existing and new assets – 5 year set timeframe	Endorsed
31	Accessible toilets with equal proportion of left- and right-hand configurations	Requirements that new trains must have accessible toilets with equal proportion of right and left-hand configurations (this includes support rail layout, door handles)	Regulatory	New and substantially refurbished/upgraded assets	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
32	Emergency call buttons in accessible toilets	Guidance on the provision of emergency call buttons in accessible toilets.	Non-regulatory	The Whole Journey Guide	Endorsed
33	Ambulant toilets	Guidance on the installation of ambulant toilets, including design considerations.	Non-regulatory	The Whole Journey Guide	Endorsed
34	Lift specifications and enhancements	Updating the Australian Standards reference to the current version.	Regulatory	New and substantially refurbished/upgraded assets	Endorsed
35	Specifications for escalators and inclined travellers	Requirements regarding minimum width specifications for escalators and moving walkways and requirements that they are not the sole means of access for passengers.	Regulatory	New and substantially refurbished/upgraded assets	Endorsed
36	Poles, objects and luminance contrast	Requirements that poles and other objects must not project onto access paths and must	Regulatory	New and substantially	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
		meet minimum luminance contrast specifications.	option 1, sub-option 1	refurbished/upgraded assets	
37	Lighting	Requirements that lighting at public transport facilities must be provided at a level that ensures safety and accessibility.	Regulatory, option 1	On commencement	Endorsed
38	Signals and processes for requesting boarding devices	Requirements for signals and processes for requesting boarding assistance on public transport vehicles.	Regulatory, option 2	New and substantially refurbished/upgraded assets	Endorsed
39	Notification by passenger of need for boarding device	Guidance to advise operators and providers on how to accommodate for passengers who notify the need for boarding device, noting passengers may communicate the need for boarding assistance in 'real time' for unbooked services.	Non-regulatory sub-option 1	Transport Standards Guidelines	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
40	Portable boarding ramp edge barriers	Design requirements for portable boarding ramps.	Regulatory option 2	New and substantially refurbished/upgraded assets	Endorsed, but there must be a process to provide edge barriers within 2 years
41	Boarding ramp and removable gangway definitions	Inclusion of new definitions for boarding ramps and removable gangways (linked to the reform below).	Regulatory	On commencement	Endorsed
42	Removeable gangway design – ferries	Requirements for the design and construction of removable gangways. A working group will be established to determine a revised regulatory option, noting proposed amendments to the National Standard for Commercial Vessels Part C1 (Design and construction – Arrangement, accommodation and personal safety).	Regulatory in-principle	Other (working group)	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
43	Nominated assistance boarding points	Direct and independent boarding must be available at nominated boarding points.	Regulatory option 1, sub-option 5	New and substantially refurbished/upgraded assets	Endorsed
44	Identification of lead stops	Requirements for identifying lead stops at bus stations, bus interchanges and bus zones.	Regulatory	Existing and new assets – 5 year set timeframe	Change to 2 year set timeframe
45	Pontoon boarding points on infrastructure	Guidance on ensuring pontoon boarding points have maximum stability and the lowest possible gradients in their operating environment.	Non-regulatory	The Whole Journey Guide	Endorsed
46	Bus, tram and light rail boarding points on infrastructure	Clarifies the requirement for 'flat and stable' surfaces at bus, tram and light rail boarding points.	Regulatory option 2	New and substantially refurbished/upgraded assets	Endorsed
47	Hail-and-ride boarding points	Requirements for the boarding points used by operators of	Regulatory	On commencement	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
	on infrastructure	hail-and-ride services.			
48	Accessible taxi ranks	Requirements for the first and last vehicle spaces to be accessible and connected to access paths.	Regulatory sub-option 1	Existing and new assets – 10 year set timeframe	Change to 3 year set timeframe
49	Accessible passenger loading zones on-street	Requirements for the first and last vehicle spaces to be accessible and for tactile ground surface indicators and kerb ramps.	Regulatory sub-option 1	Existing and new assets – 10 year set timeframe	Change to 3 year set timeframe
50	Accessible parking spaces in infrastructure off-street car parks	Requirements that off-street public parking areas must provide one accessible parking space for every 50 parking spaces where there are more than five parking spaces.	Regulatory sub-option 1	Existing and new assets – 10 year set timeframe	Change to 5 year set timeframe
51	Grabrails on access paths	Requirements for the luminance contrast, height and size of grabrails on access paths.	Regulatory	New and substantially refurbished/upgraded assets	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
52	Grabrails in allocated spaces	Requirements for the luminance contrast, height and size of grabrails in allocated spaces.	Regulatory	New and substantially refurbished/upgraded assets	Endorsed
53	Mobility aid movement in allocated spaces – passive restraints	Guidance on the containment of mobility aids in allocated spaces for buses, ferries, trams and light rail.	Non-regulatory	The Whole Journey Guide	Endorsed
54	Mobility aid movement in allocated spaces – active restraints	Guidance on the safe use of active restraints and ensuring mobility aids meet safety requirements.	Non-regulatory	The Whole Journey Guide	Endorsed
55	Appropriate seats on booked services	Passengers with disabilities must be able to book seats that are located in parts of a public transport vehicle that are appropriate for their travelling needs.	Regulatory	Existing and new assets – 5 year set timeframe	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
56	Conveyance dwell times at stops	Guidance that conveyances should not depart from stops until passengers are safely seated, securely located or securely positioned in allocated spaces or have safely alighted.	Non-regulatory	The Whole Journey Guide	This must be regulated and should occur ASAP as this is a serious safety issue
57	Stairs on trains	Requirements for the size, luminance contrast, handrails and access paths of stairs on trains.	Regulatory sub-option 2	On-commencement	Endorsed
58	Stairs on ferries	Requirements for the size, luminance contrast, handrails and access paths of stairs on ferries.	Regulatory	New and substantially refurbished/upgraded assets	Endorsed
59	Stairs on buses	Requirements for the size, luminance contrast, handrails and access paths of stairs on buses.	Regulatory	New and substantially refurbished/upgraded assets	Endorsed
60	Doorway contrast and height	Luminance contrast requirements for doors on access	Regulatory	Existing and new assets – 5 year set timeframe	Endorsed

#	Reform Area	Description	Agreed option	Implementation approach	Recommendation
		paths for public transport vehicles excluding coaches.			

Conclusion

People with disability have already waited over 23 years for accessible public transport, and we need reforms that accelerate progress, incentivise changes that improve access, and that co-design solutions.



**PEOPLE WITH DISABILITY
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People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

For individual advocacy support contact PWDA between 9 am and 5 pm (AEST/AEDT) Monday to Friday via phone (toll free) on **1800 843 929** or via email at pwd@pwd.org.au

Submission contact

Bastien Wallace

Senior Policy Officer

E: bastienw@pwd.org.au

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