

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

Reviewed Document: Motorised Mobility Devices Discussion Paper

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Reviewer: Michelle Moss, Queenslanders with Disability Network

#1 – Section 4.1

Comment: Option 1 – Do nothing

Authors Response: Queenslanders with Disability Network (QDN) does not support this option. As highlighted in the discussion paper, under this option, consumers would continue to lack clear, objective information about whether a particular MMD meets their needs, for example, for use on footpaths and/or public transport. Additionally, the absence of consumer guidance information may mean that users of MMDs are unclear what the labels under the Technical Specification mean.

#2 – Section 4.2

Comment: Option 2 – Consumer driven adoption of the Technical Specification

Authors Response: QDN supports consumer choice in the purchasing of goods and services used by people with disability. However, QDN does not endorse this option as it is written. QDN believes that Option 2 as outlined in the Discussion Paper assumes that the consumers will be aware of the standards and insist that suppliers inform them about the expected performance of the MMD that is under consideration for purchase. Unfortunately, this places too much responsibility on the consumer. QDN believes that for this strategy to be effective, a nation-wide consumer education, training and development strategy on MMD devices would need to be developed and implemented so that consumers can make informed purchases and be thoroughly knowledgeable of the Standards.

#3 – Section 4.3

Comment: Option 3 – Industry driven adoption of the Technical Specification

Authors Response: QDN supports Option 3 because it obliges retailers to inform their customers as to the expected performance of the MMD before purchase. QDN believes this option would not limit the use of devices on public transport or footpaths but customers will understand what the device can and cannot do with respect to boarding a bus.

#4 – Section 4.3

Comment: National Disability Insurance Scheme

Authors Response: QDN agrees with the assertion in the discussion paper that:

Allied Health Professionals and the NDIA should be informed of the labelling system and encouraged to recommend or consider devices that are suitable for purpose as per the labelling system. Furthermore, QDN believes there needs to be an awareness strategy targeted at people with disability regarding the labelling system to ensure NDIS participants can exercise full choice and control under the NDIS in relation to using NDIS funds to purchase assistive technology.

#5 – Section 4.4

Comment: Option 4 – Regulatory prescription of the Technical Specification

Authors Response: QDN does not support this option. As highlighted in the discussion paper, under this option, regulatory adoption is considered to limit user choice. Additionally, regulation would potentially allow public transport providers to refuse service to white label MMD -- despite them being able to board trains and ferries. As highlighted in QDN's submission to the Inquiry, QDN does not support any option that restricts people's movement and full enjoyment of their civil, economic and cultural rights.

#6 – Section 4.5

Comment: Other regulatory considerations. Do you have a view on possible amendments to the ARR to recognise the unladen mass limits for MMDs as shown in the Technical Specification?

Authors Response: QDN believes that as long as the combined weight of the MMD and user is not in excess of 300kg, then the device should be fit for purpose for transportation on conveyances.

#7 – Section 6.3

Comment: Registration of MMD's

Authors Response: As highlighted in QDN's submission to the Inquiry, QDN supports the national adoption of registration of MMDs as a workable solution. The Queensland registration scheme provides gratuitous compulsory third party insurance (CTP) coverage for MMD users. A national scheme could provide the same benefit.