

December 2025

Physical Disability Australia Submission:

Exposure Draft - Disability Standards for Accessible Public Transport Amendment 2025



physical disability
AUSTRALIA

Contents

Contents.....	2
Acknowledgements	3
About Physical Disability Australia	4
Overview.....	5
Scope of this submission	6
Transitional arrangements and implementation	7
Approaches to Reform	8
Co-design and lived experience	9
Whole-of-journey approach	9
Workforce capability.....	9
Regional and remote accessibility	9
Universal Communication and Information Access.....	10
Equal Importance of Communication and Cognitive Accessibility	10
Universal Design for Accessible Communication	10
Cognitive Accessibility Principles.....	10
User Testing and Real-World Accessibility	10
Digital and information access	11
Multimodal Information Delivery and Cognitive Accessibility.....	11
Communication Accessibility.....	12
Communication Accessibility in Public Transport Standards	12
Prioritising Communication Accessibility	12
Hearing Augmentation Systems (HAS).....	12
Emergency Communication Systems.....	12
Symbols and Signage	12
Information Provision.....	12
Alignment with Universal Design and Disability Strategy	13
Conclusion	13
Supporting Equitable Access: Implementation Requirements	13
Essential Elements for Successful Implementation.....	13
Universal Communication Accessibility	13

Acknowledgements

Physical Disability Australia pays our respects to the Traditional Owners of the lands on which this submission was written and throughout Australia. We recognise their continuing connections to land, waters and skies and pay our respects to Elders past, present and emerging.

Physical Disability Australia also acknowledges people with disability, past and present, those who are living full and complete lives and those who have needs that are not yet being met. We ask you to reflect on this and to work with us to bring about the changes that will give ALL people with disability an opportunity to live an ordinary life.

About Physical Disability Australia

Physical Disability Australia (“PDA”) is a national peak Disability Peoples Organisation run by people with physical disability for people with physical and intersectional disability. PDA exists for its members, who fuel our mission to “enable every Australian living with a physical disability to realise their full potential”.

Through our work, we advocate to government, create equal opportunities, promote diversity and inclusion and ensure that our values within the organisation, and our representation of Australians living with physical disability, are reflected, upheld and defended.

With physical disability affecting 75.3% of Australia’s disability community, Physical Disability Australia welcomes the opportunity to provide a response to the *Exposure Draft – Disability Standards for Accessible Public Transport Amendment 2025*.

Overview

Public transport is a fundamental enabler of equality and inclusion, providing people with disability with essential access to education, employment, healthcare, key services and community life. Upholding these rights, the Disability Standards for Accessible Public Transport 2002 (“Transport Standards”) were established to ensure that operators and providers clearly understand their responsibilities under the Disability Discrimination Act 1992, and to support the delivery of transport services that are safe, dignified and accessible for all.

Over the past 23 years, public transport systems have evolved significantly, with advancements in technology and shifts in user needs. Consequently, the existing standards require modernisation.

For many Australians with physical disability, reliable and accessible public transport is foundational to exercising their rights to independence, mobility, community participation and equal opportunity. This submission affirms the need for coordinated national implementation, genuine codesign with people with disability, and sustainable funding that ensures accessibility reforms are realised consistently across all sectors.

Scope of this submission

Physical Disability Australia's submission focuses on whether the Exposure Draft:

- Effectively and clearly gives effect to the agreed reforms.
- Provides realistic, workable and transparent transitional arrangements; and
- Whether it addresses the systemic factors that continue to prevent equal access to transport for people with physical and intersecting disabilities, especially in rural, regional and remote locations.

Physical Disability Australia also endorses the intention of the Exposure Draft to consolidate and reform accessibility requirements to better align with modern Australian Standards, which would improve clarity and practical uniformity.

However, these amendments remain challenging for non-experts to understand, especially local governments and smaller community transport providers.

Therefore, Physical Disability Australia recommends:

- Creating explanatory manuals using plain English with the final Standards that includes practical examples, and diagrams.
- A summary table that outlines the responsibilities of operators, providers and infrastructure owners to better assist understanding and conformity.
- Strengthening the definitions of 'substantial refurbishment', 'approach to market' and 'existing asset' to prevent inconsistency across stakeholders and jurisdictions.

Transitional arrangements and implementation

The Exposure Draft outlines transitional periods of 5 and 10 years for certain reforms, such as priority seating, resting points, loading zones and taxi ranks. Physical Disability Australia endorses this course of action, but wishes to ensure that dedicated funding, monitoring and accountability mechanisms will be in place to avoid weakening these reforms.

To avoid this risk, Physical Disability Australia recommends:

- That governments, alongside the disability community, co-design an Accessible Transport Implementation Framework which identifies clear achievements, performance indicators and funding responsibilities.
- That plans on implementation are shared publicly and reported annually to promote transparency.
- That funding is prioritised for redeveloping existing assets to meet the requirements under the Standards, which recognises the significant cost and technical issues involved.
- That all transitional provisions explicitly acknowledge interdependencies with related frameworks like the Disability Access to Premises – Buildings Standards 2010 and the approaching updates to the Disability Discrimination Act 1992.
- That planning around implementation includes mechanisms for ongoing monitoring, evaluation and user feedback to ensure accessibility outcomes are practically achieved.
- That Governments establish arrangements across all jurisdictions and operators that promote accountability. This should be supported by regular data collection on accessibility compliance and passenger experience.

Approaches to Reform

Physical Disability Australia endorses the decision to adopt a regulatory approach to reforms pertaining to accessibility, safety and usability. We feel that strong legislative and regulatory measures are vital to ensure compliance and investment, especially in circumstances where jurisdictions have been unsuccessful at meeting guidance only or voluntarily targets.

In saying this, Physical Disability Australia notes the importance of non-regulatory measures to ensure consistent understanding and support smaller operators. Physical Disability Australia recommends that these non-regulatory measures should be created through co-design with people with disability and other stakeholders and includes practical examples to be published alongside the final Standards.

When considering point-to-point and rideshare transport, hearing augmentation and school bus accessibility, Physical Disability Australia does not support the maintaining “status quo” approach. These are high-impact and law regulation areas that continue to exclude many people with disability. Physical Disability Australia recommends further work be done and staged regulatory inclusion should be required to close these gaps.

Co-design and lived experience

All reforms must be designed and monitored in genuine partnership with people with diverse disabilities from across the country. The Standards new technical requirements should be informed by rigorous accessible consultation, and feedback processes throughout implementation.

Whole-of-journey approach

The reforms must ensure accessibility extends beyond stations and vehicles to include the entire journey from start to finish. The new Standards should be unified with regional and local transport planning, wayfinding and digital information systems to deliver consistent accessible outcomes.

Workforce capability

Physical Disability Australia supports that all operators and providers should undergo ongoing disability awareness and communication training tailored to their roles.

Regional and remote accessibility

Accessibility challenges are exacerbated in regional, rural and remote locations where there are infrequent services, limited digital connectivity and older physical infrastructure. Physical Disability Australia recommends targeted funding and guidance for these areas to ensure equitable implementation and the avoidance of further entrenching disadvantage due to geography.

Universal Communication and Information Access

Equal Importance of Communication and Cognitive Accessibility

There is strong consensus among disability representative organisations (DROs) regarding the necessity for the Standards to recognise communication and cognitive accessibility as being just as vital as physical access. While the Exposure Draft introduces improvements in technical design, it still tends to emphasise accessibility primarily in terms of physical and sensory aspects. To achieve genuine inclusivity, it is essential to ensure communication access is consistently integrated across the entirety of the travel experience — before, during, and after journeys.

Universal Design for Accessible Communication

Accessible visual and auditory systems must be regarded as fundamental components of universal design, not merely as features for emergency situations. Relying solely on hearing augmentation systems does not guarantee equitable access, especially for Deaf and hard-of-hearing passengers who may not utilise compatible assistive devices. Therefore, investment in comprehensive visual alert and information systems for all announcements — including service updates and emergencies — is recommended to ensure all passengers are effectively accommodated.

Cognitive Accessibility Principles

People with intellectual and cognitive disability continue to encounter significant barriers when navigating public transport. These challenges stem from issues such as inconsistent signage, complex language, inaccessible digital platforms, and limited staff assistance. As such, it is crucial to embed cognitive accessibility principles throughout the Standards. This includes the consistent use of pictograms and easy-to-understand symbols in place of text-heavy or letter-based signage, the provision of clear, plain language and Easy Read formats for written, digital, and in-person information, and the establishment of communication access that begins at the trip planning stage and remains in place throughout the journey.

User Testing and Real-World Accessibility

To ensure information systems and technology deliver genuine accessibility, it is important to conduct user testing with people with disability. This process helps confirm that communication and information platforms meet practical needs and work effectively in real-world scenarios.

Digital and information access

Multimodal Information Delivery and Cognitive Accessibility

Reforms to Parts 17, 18, and 27 should establish clear requirements for the provision of information in multiple formats. This means that information must be delivered using a combination of visual, auditory, and text-based methods to accommodate the diverse needs of all users. By ensuring that key details are communicated through various channels, access is improved for individuals with different sensory needs.

Furthermore, it is essential that cognitive accessibility guidelines are systematically applied to all digital platforms associated with transport services, including websites, mobile applications, and ticketing systems. This approach supports users with intellectual and cognitive disabilities by making digital content easier to navigate and understand.

In addition, printed and offline information must continue to be provided as a standard option. This ensures that people who lack digital literacy or do not have access to digital devices are not excluded from vital information about public transport services.

Communication Accessibility

Communication Accessibility in Public Transport Standards

Prioritising Communication Accessibility

PDA understands the important focus of physical accessibility than communication accessibility. However, accessible visual communication systems should be recognised as fundamental components of universal access, not restricted solely to emergency situations. To address this gap, PDA recommends dedicated investment in comprehensive visual alert systems for all public announcements. Such systems would enhance access for Deaf passengers and offer benefits to all users by facilitating clearer, multimodal communication.

Hearing Augmentation Systems (HAS)

Section 26 addresses Hearing Augmentation Systems (HAS), but it is important to note that HAS technology should not be the only method of communication access for Deaf and hard-of-hearing passengers. Many individuals with hearing loss do not utilise hearing aids or compatible devices, and the limited range of HAS technology reduces its effectiveness. Therefore, additional communication solutions are necessary to ensure that all passengers can access essential information.

Emergency Communication Systems

Current requirements for emergency communication, as outlined in Part 13, focus primarily on lifts. PDA proposes expanding this requirement to include stops, platforms, stations, and all conveyances. This expansion would ensure consistent and reliable communication for Deaf, non-verbal, and hearing-impaired passengers throughout their entire journey.

Symbols and Signage

Parts 16 and 17 should incorporate interpreter symbols, including those for spoken language and Auslan, for transport operators and providers. The inclusion of these symbols would signal the availability of communication support, further promoting accessibility for all passengers.

Information Provision

The introduction of section 27.6, which requires services to offer passenger location information through both visual and audio displays, represents a significant improvement. However, communication access must be available before, during, and after travel. This includes access to trip planning tools, updates on service disruptions, and connection information, ensuring a seamless and inclusive information experience for all users.

Alignment with Universal Design and Disability Strategy

Collectively, these proposed changes would bring the Standards in line with universal design principles and uphold Australia's commitments under the Disability Strategy 2021–2031 to enhance communication access across public life.

Conclusion

Supporting Equitable Access: Implementation Requirements

PDA supports the intent of the Exposure Draft and acknowledges the move toward clearer and more contemporary accessibility requirements. While legislative reform is a critical step, PDA emphasises that equitable access cannot be realised through legislation alone. Effective implementation is essential to achieving genuine inclusivity within the transport system.

Essential Elements for Successful Implementation

- **National Coordination:** A unified approach across all states and territories is necessary to ensure consistency and effectiveness in applying accessibility standards.
- **Co-design:** Involving people with lived experience of disability in the design process is crucial for developing practical and meaningful solutions.
- **Adequate Funding for Retrofitting:** Sufficient resources must be allocated to update existing infrastructure, ensuring older facilities meet new accessibility standards.
- **Workforce Training:** Investment in training for transport staff and service providers will help build awareness and capability to deliver accessible services.
- **Transparent Reporting:** Ongoing monitoring and public reporting will support accountability and continuous improvement of accessibility initiatives.

Universal Communication Accessibility

PDA places particular emphasis on the need for universal communication accessibility. This includes investing in visual information systems and establishing inclusive communication standards to ensure all passengers, regardless of their communication needs, have access to essential information throughout their journey.

Collaboration and Commitment

PDA welcomes further collaboration with the Department of Infrastructure, Transport, Regional Development, Communications, and the Arts. By working together, stakeholders can ensure that the final Transport Standards fulfil the promise of accessible journeys for all Australians, creating a truly inclusive transport network.