



# Exposure Draft - Disability Standards for Accessible Public Transport Amendment 2025 Consultation

December 2025



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## The Bus Industry Confederation

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**The Bus Industry Confederation (BIC) is the national independent peak body for the Australian Bus and Coach Industry. We represent over 160 bus and coach operators, body, chassis and complete bus manufacturers and suppliers, parts and service providers, professional services, and state bus associations on issues of national importance.**

Our membership is becoming increasingly diverse as key energy and infrastructure partners join as we transition the fleet to low and zero emissions. The BIC advocates on behalf of our members to federal, state and territory governments and associated bodies, to ensure the safe and efficient carriage of passengers, along with safe and sustainable operations and supply chains that support the industry.

### About Buses

Buses serve as mass transit, delivering benefits like reduced congestion, lower pollution, and enhanced productivity, as well as providing critical social mobility through frequent local routes. These benefits extend to improved public health, lower crime rates and better overall social outcomes, resulting in reduced costs for health and legal systems. The Australian bus industry is uniquely positioned to lead the transition to zero-emission technologies<sup>1</sup>. for heavy vehicles, assisting decarbonising strategy for the nation.

Buses have a strong and diverse manufacturing, and supplier presence in Australia providing 10,000 direct and indirect jobs in Australia. This encompasses full manufacturers, assemblers, importers, component manufacturers, suppliers, and importers. We provide an economic contribution \$5Billion yearly to the Australian economy.

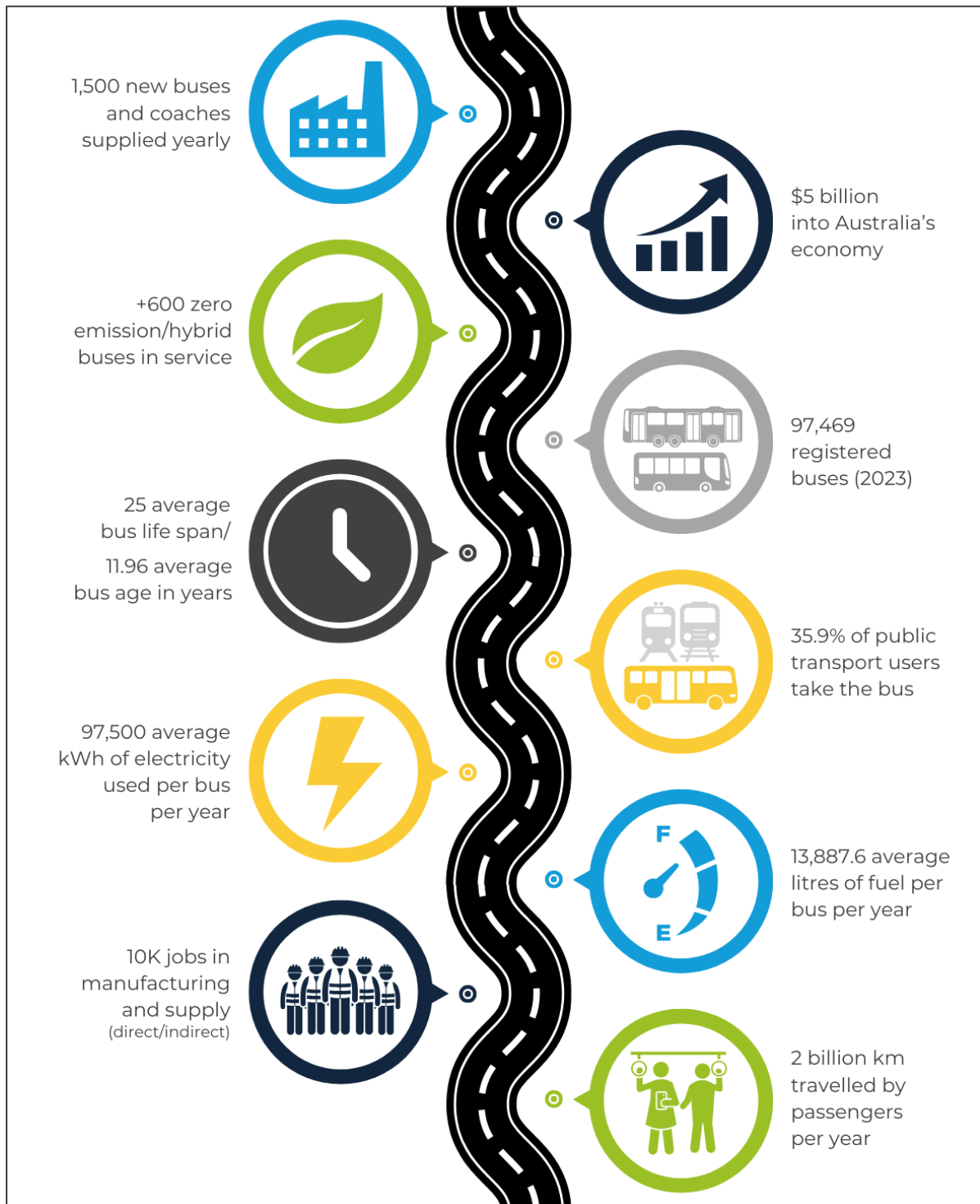
Buses provide a cost-effective safe role in moving people from and to their destinations every day, whether it is dense urban outer urban, regional, remote, or interstate. For example, in outer suburban areas, where other mass transit options are scarce, buses are vital in addressing poverty, disadvantage, and the financial strain of car ownership. They offer essential mobility to communities facing isolation, poor services, and socio-economic challenges.

Buses carry more people further than any other public transport mode.

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<sup>1</sup> BIC Policy Paper – [Driving Towards Zero Emissions](#)

## Industry Snapshot | 2025



## Response

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The Bus Industry Confederation (BIC) welcomes the opportunity to provide input to the Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts (DITRDCA) consultation on the exposure draft of the Disability Standards for Accessible Public Transport Amendments 2025.

BIC have only responded to specific sections relevant to the bus and coach industry.

### General Feedback

The BIC surveyed a broad cross-section of the Australian bus industry, including operators, suppliers, government agencies, and consultants, providing insight into sector readiness and concerns regarding proposed Disability Transport Standards reforms.

Overall, there is strong support for updating the Standards to improve accessibility and align with modern bus design and international best practice, though respondents expressed caution about cost, operational impacts, and feasibility.

Key challenges identified include:

- adapting older fleets,
- managing downtime,
- funding constraints, and
- technical feasibility of vehicle and infrastructure upgrades.
- Practical ability to achieve some of the proposed amendments, especially:
  - Luminous contrast and;
  - Consolidation of allocated spaces

The bus industry strongly favours a progressive, phased approach, prioritising new or substantially upgraded assets while allowing realistic transition periods for existing fleets, supported by government guidance, funding, and expert advice.

Despite some concerns, overall, the bus industry is hopeful for long-term benefits, including improved accessibility, network inclusivity, clearer design expectations, and fleet modernisation, while emphasising the importance of staff training and collaborative engagement with government to ensure practical and cost-effective implementation.

### Post Submission Discussion

It is essential to address the concerns raised to ensure the standard delivers genuine benefits for public transport users and providers.

**BIC strongly recommends further direct consultation on any issues that DITRDCA may have questions about.**

## Amendments to Part 2 (Access paths)

### Section 2.6 Access Path on conveyances

The inclusion of new requirement for 1,500mm vertical height (Section 1A) and the subsequent exclusions for this in (1B) do not consider:

- safety measures that are in place to protect drivers from anti-social behaviour such as driver safety screens.
- Payment devices such as ticket validation equipment.

Driver safety is absolutely critical, especially with the significant rise of anti-social behaviour on buses. This rise in some states is recorded between 184% and 400% in the last 5 years<sup>2</sup>. Payment of onboarding systems is of course a standard fitment in vehicles

**Recommendation:** With driver safety being of upmost importance, and the standard nature of payment of onboarding equipment, it is recommended that driver safety screens and ticketing equipment are added into the exclusion section of section 2.6 (1B).

## Amendments to Part 3 (manoeuvring areas)

### Section 3.2 Obstructions in manoeuvring are-conveyances

Buses (excluding dedicated school buses) must have unobstructed manoeuvring areas with a minimum vertical clearance of 1,500 mm, while limited exceptions apply for grabrails, handrails, and approved barriers. The reform may impact the placement of ticketing equipment due to their size.

**Recommendation:** that ticketing equipment be added to the list of exclusions (as stated above)

### Section 3.4 Co-location of manoeuvring areas with access paths and allocated spaces-conveyances

The amendment requires manoeuvring areas on buses (excluding dedicated school buses) to be positioned as close as possible to access paths and allocated spaces to improve ease of movement. The amendment doesn't address the following items:

- Front wheelarch area - the need for access paths to navigate through the front wheelarch area of a bus in order to reach the allocated space and manoeuvring areas. This is highlighted in figure 1 below.
- Boarding point - The need that many people in wheelchairs specifically wish to board and alight from the bus at the front door.
  - The way our industry stakeholders have interpreted this would imply a requirement for the wheelchair ramp to be located at the centre (rear) door of a bus or to install a dedicated second door on single door vehicles.
  - Front boarding point is something mandated at the front in many state and territory contractual arrangements.
  - A front boarding point is also seen as non-discriminatory as all passengers are able to enter from the same boarding point.
  - Bus stop infrastructure is generally set up for front door entry.
  - Many buses only have a front door

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<sup>2</sup> Source – Bus Industry Confederation study of assaults on bus drivers  
© Bus Industry Confederation Inc. – Page | 6



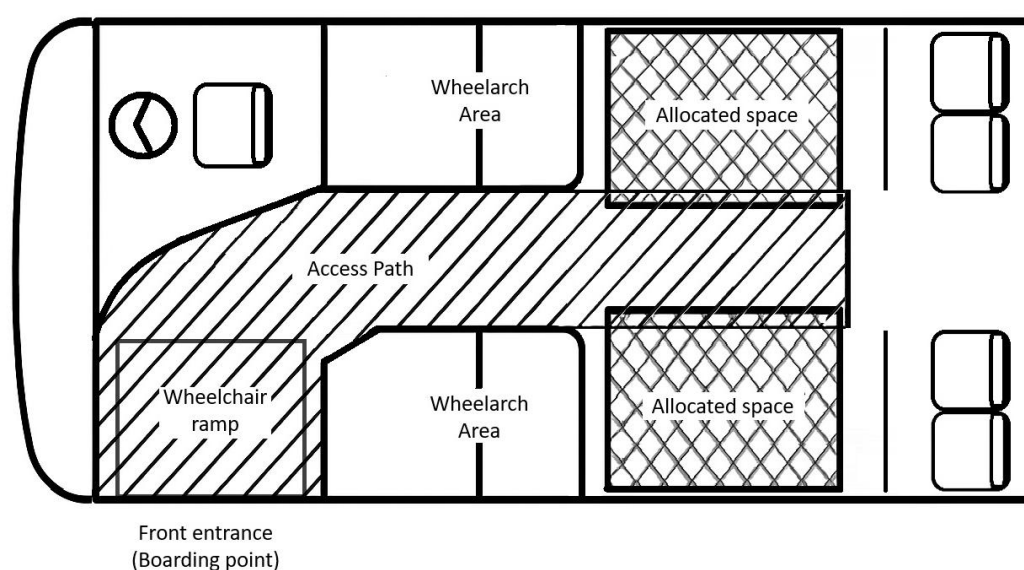


Figure 1 – access path, manoeuvring area and allocated space

**Recommendation:** Implementation of this amendment should consider the need to recognise the access path through the front wheel arch area and also current well accepted practices for the boarding point to be at the front of the vehicle.

Consider adding the words ‘as practically possible’ and the inclusion of a diagram such as the one shown above, to serve as a clear and practical visual aid.

## Amendments to Part 8 (boarding)

### Section 8.1 Boarding points and kerbs

The amendment requires boarding points to have a firm, stable surface suitable for safe use of boarding devices, and a gradient no steeper than 1:40 (unless physically constrained).

Where passengers cannot board independently, operators must provide a designated assistance point nearby with staff available to help, and passengers must be able to communicate with staff in person or via a device. There is currently a shortage of boarding points for route bus services, particularly in regional and rural areas.

**Recommendation:** Implementation should prioritise increasing the availability of compliant boarding and assistance points, especially in regional and rural areas, to ensure passengers can safely access vehicles and receive the required support.

### Section 8.1A Identification of accessible conveyances

The amendment stipulates that a bus can only be considered accessible if it includes a regular seat, a priority seat, a reserved space for wheelchair or mobility aid users, and accessible versions of any other facilities (e.g., toilets) 8.1A (1) (d).

The current proposal will lead to confusion for users and operators of the buses and coaches with regards to what is accessible and what isn't, especially existing vehicles.

**Recommendation:** BIC recommend adopting a tiered approach to accessibility for buses, with requirements tailored to the type of bus and the service provided. For example, BIC recommend a two-tiered approach for user and industry clarity, as follows:

1. Accessible – Meets all the requirements of 8.1A (1) (a thru c).
2. Accessible with facility\* - Listing the facility provided. Using the example provided in the draft amendments it would be Accessible with Toilet.

This change removes the ambiguity in the current proposal which implies that a bus or coach with wheelchair access and a toilet (but not an accessible toilet) cannot be described as accessible, leading to confusion for passengers trying to use the coach. It also provides clear guidance to all users on the bus or coach about the features available.

## Amendments to Part 9 (allocated space)

### Section 9.1(A) Unobstructed vertical dimension of an allocated space

**Recommendation:** Please see our response to Section 2.6 Access Path on conveyances for additional exclusions to be added in. These specific exclusions are to allow for driver safety screens and also ticketing equipment to be excluded for safety and practical purposes.

### Section 9.7 Consolidation of allocated spaces

The amendment introduces a new requirement (sub-section 2) that requires 'If allocated spaces are consolidated, the access paths leading to, and the manoeuvring areas for, each allocated space must not be compromised.'

With buses and coaches being the smallest of the mainstream conveyances, the practical implementation of this is not possible within the constraints of current Australian Design Rules (ADRs) that apply to road going vehicles such as buses.

Specifically, the issue is the width of the bus is limited by law to 2500mm (2.5m). ADR 43/04 states:

*Section 6.1.5.1 - The 'Overall Width' of a category MA, MB, MC, MD, ME, NA or sub-category NB1 vehicle must not exceed 2,500 mm.*

Note: buses are categories 'MD' and 'ME'.

### **The issue**

The provision of two allocated wheelchair spaces directly opposite each other behind the front wheel-arches. Such designs serve to maximise seating capacity, while also minimising the access path that wheelchair patrons need to traverse upon ingress and egress. See figure 1 earlier in this response.

When allowing for the structural requirements of the base vehicle, width requirements of the wheelchair access spaces and an access path, there this exceeds the legally permitted 2500mm width.

The accumulated internal width requirements across the bus can be summarised as: body structure (80mm) + (800mm allocated space) + (850mm access path) + (800mm allocated space) + body structure (80mm) = 2610mm. This isn't even allowing for general tolerances of bus design or structural curvature even in the millimetres.

Extending the width to 2550mm (European standards,) or 2600mm (U.S standards) will not address the matter.



Placing the allocated spaces behind each other as this results in the wheelchair user having to navigate more than half the length of the bus from the boarding point to their allocated seating and also then consequential issues for the fitment of various modesty panels for those seated passengers and generally safety requirements.

#### The solution

In order to be legally compliant on width, the practicalities of such solutions would indicate that there is some practical compromise required in the shared space between the access path and the allocated wheelchair allocated space/s. If the access path is considered to extend beyond the rear of the front wheel-arches and into the allocated wheelchair spaces, then more than 50mm of common space is shared than listed in section 2.8 (2).

**Recommendation:** Is that that sub section (2) is amended to allow overlapping based on the width of the bus.

BIC have written suggested text and an explanation to provide clarity. *If allocated spaces are consolidated, the access paths leading to, and the manoeuvring areas for, each allocated space should not be compromised unless restricted by overall conveyance width.*

Example: Figure 2 of a bus below showing an example of where some overlapping is permitted due the width limitations to 2500mm by regulation.

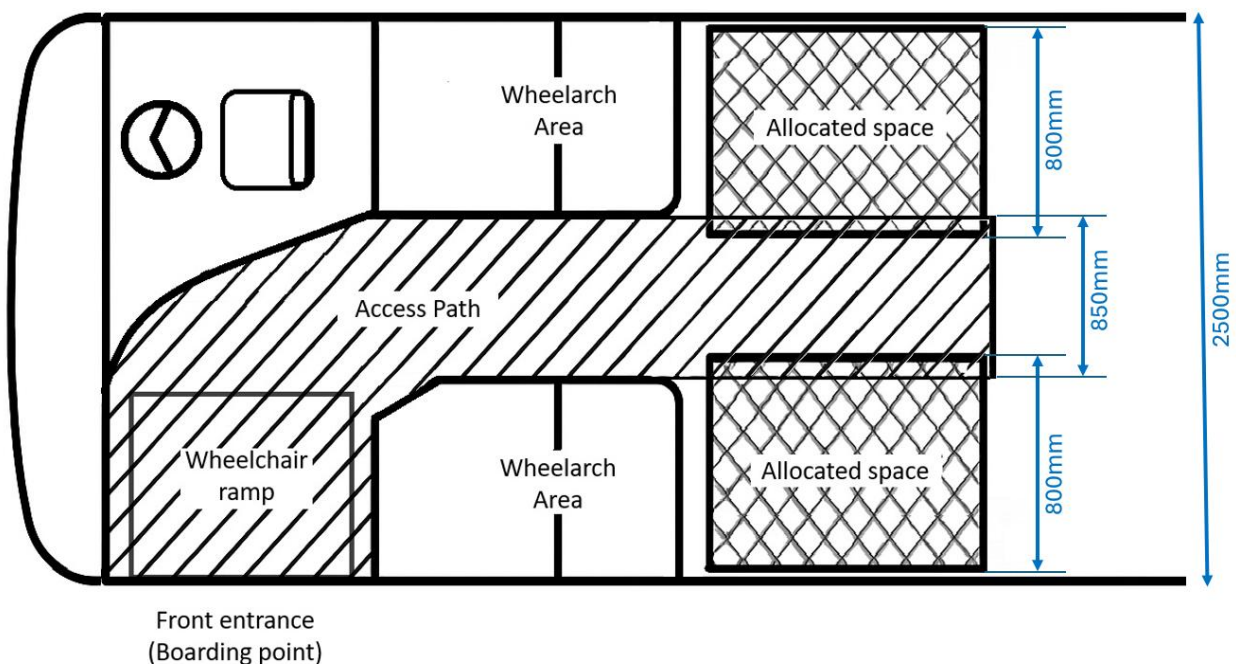


Figure 2

#### Section 9.12 Access for persons in wheelchairs etc

The amendment requires that people using wheelchairs or mobility aids must be able to board and alight the vehicle and secure their aids in the allocated space. Where this is not possible, operators must provide direct assistance.

Whilst we understand that this change is relocating this section from 3.2 to 9.12, concerns have existed for some time. We wish to re-highlight regarding the level and scope of assistance expected identification of qualifying mobility aids (particularly those with lithium batteries), safety considerations, and driver training requirements. Addressing these concerns are important for clarity of the public using accessible public transport and the industry workers interacting with users.

**Recommendation:** Develop clear national standards defining what constitutes a mobility aid or device and the scope of direct assistance. Establish guidance on safe handling, including maximum reasonable weight for lifting, and appropriate training for drivers providing assistance to ensure safety and consistency across operators.

## Amendments to Part 11 (Handrails and grabrails)

### Section 11.3 Handrails on steps and stairs—conveyances

This section contains two matters BIC wish to raise. They are Subsection (4) and subsection (5)

#### **Sub section (4) handrails**

This sub section states *A handrail is not required for a single step in a bus*. It implies that handrails are required for any area with multiple steps.

While this is logical when it comes to stairs and staircases, there is an issue with aiseways in buses where there are multiple steps. Reference figure 3 further below as an example. In this example, which is a common low entry bus configuration, there are multiple steps in the aisleway to move to the rear of the bus. A handrail in this case isn't practical and would prohibit access to seats that are positioned adjacent to the steps. The ability for a device to hold onto is critical though and this is catered for by vertical handrails and grab handles.

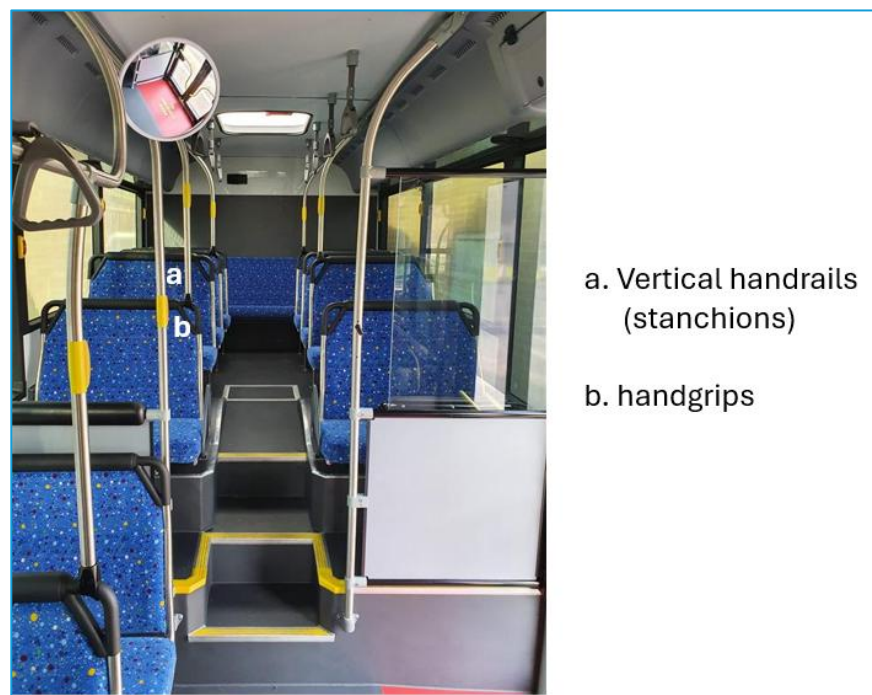


Figure 3 Bus aisleway with stanchions and handgrips

**Recommendation:** Sub section (4) is amended to recognise stanchions and handgrips in the aisleway of buses in order to be practically achievable

#### **Sub section (5) Luminous contrast**

The new requirement in sub-section (5) for luminous contrast is designed for building and not for vehicles. The bus industry views the importance of luminous contrast but to impose a

standard not tested on vehicles will lead to issues on demonstrability of compliance. The additional requirement of viewed within 2m on other surfaces is over-prescriptive and not practically achievable on a bus given the sheer number of surfaces within 2m of the handrail (more than 20).

In short, sub section (5) in its current form **is not practically achievable**.

**Recommendation:** Sub section (5) In its current form, the requirement should be removed entirely or re-written removing the section *'when viewed against any background wall or surface adjacent to the handrail that is within 2 metres of the handrail*.

#### Section 11.8 Grabrails on access paths

The new requirement in sub-section (3) for luminous contrast present the same concerns regarding practical achievability for buses as mentioned in section 11.3 earlier in this submission. Sub section (3) in its current form **is not practically achievable**.

**Recommendation:** Sub section (3) In its current form is either removed entirely has its sub sections (a) through to (c) removed to be practically achievable.

### **Amendments to Part 12—Doorways and doors**

#### Section 12.4 Clear opening of doorways

Sub section (6) of this requirement states that the preceding sub sections (3 through to 3) do not apply to a door on a coach with an underlying note: *Australian Design Rule 58 imposes other obligations in relation to buses and coaches*.

The concern for this Subsection (6) currently applies only to coaches, omitting buses, which is in conflict with the correct underlying note.

**Recommendation:** Sub section (6) needs to be adjusted to include buses, not just coaches.

### **Amendments to Part 14 (Stairs)**

#### Part Title Stairs

Given the changes to this section and the inclusion of requirements for passenger doors in buses, the title of this section could be unintentionally misleading and key element overlooked easily.

**Recommendation:** This section is renamed to reflect the context of content within it.

#### Section 14.4 Specific requirements—buses

Sub section (6) requires handrails on doors and accessible when open. Sub section (7) requires those handrails to be permanently fixed to the body of the door.

Buses have many different types of door types and in most cases, these requirements are practically achievable and welcomed. The exception though is a type of door used on some buses called a 'plug door' The design and operation of the door a grab rail would serve no useful purpose if mounted and would not be accessible from the inside. They are used also on other types of conveyances such as light rail (trams).

When the door is closed an internal handrail is normally not required. Of course, should the door hinge outward or inward a handrail serves as a useful means to assist people aligning on boarding.

A plug door is basically a sliding door. When the door is opened the internal face of the door is up against the external body structure of the bus. Accessibility to a handrail if fitted would not be possible, rendering the handrail redundant. Refer figures 4 & 5 below. Handrails in such applications are applied to the internal structure of the bus immediately adjacent to the door.

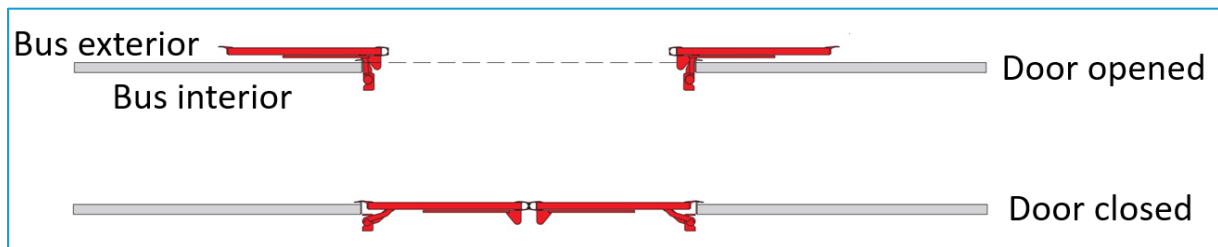


Figure 4 – Illustration showing double plug door opened and closed (top view)



Figure 5 – Picture showing single plug door opened. Note inside of door is up against the body of bus.

Example operational video of a plug door: <https://vimeo.com/851177961?fl=pl&fe=sh>

**Recommendation:** Sub section (6) is amended to exclude 'plug doors' from the requirement.

## Amendments to Part 17 (signs)

### Section 17.1 Height, illumination and legibility

Firstly, BIC understand the importance of having legible signs for people with visual impairment, but we are concerned regarding practical validation of the requirements and also contradicting Australian Design Rules.

Subsection 2 presents numerous concerns in its current form resulting to the point it is not achievable, specifically Font and luminous intensity.

Font:

Sub section (2)(a) states sign font must be sans serif. This conflicts with:

- Australian Design Rule ADR 68/01 Occupant Protection in Buses section 5.8.1 (a) which states seat belt reminder system text must be in *Arial or Helvetica medium typeface font*.
- AS 1428.2 (1992) table 2 HEIGHT OF LETTERS FOR VARYING VIEWING DISTANCES that has a note underneath stating **Helvetica Medium typeface is preferred**

**Recommendation:** The font is corrected to be in alignment with AS1428.2 (1992) and Australian Design Rules.

Luminous contrast:

Sub section (2) (d) detail luminous contrast specifications. As mentioned in response to previous sections of the proposed amendments (see Part 11 earlier in this response), the prescriptiveness of such requirements is not practically achievable.

**Recommendation:** BIC strongly recommend that sub section (2) (d) is removed as its not practically achievable. The preceding requirements in sub section (2) (c) are considered more than adequate.

#### Section 17.5 Digital information display screens

The amendment requires that information on digital display screens be visible for at least 10 seconds (or long enough to acknowledge ticket validation), clearly readable from an unobstructed line of sight, viewable while wearing polarized glasses, and compliant with contrast standards under AS EN 301 549.

It also requires the screen is free from obstruction from all viewing areas, for which there are no exemptions. In buses and possibly other conveyances, exemptions are required handrails or grabrails, overhead handrails and handgrips for this to be achievable.

**Recommendation:** Limit the visibility requirement to screens viewable from the priority seating area to ensure practical compliance. Include exemptions for grabrails, overhead handrails or handgrips.

### **Amendments to Part 27 (information)**

#### Section 27.1 Access to information about transport services

The amendment requires that general transport information—including timetables, routes, fares, payment methods, and next stop/service details—be accessible to all passengers and not provided exclusively online.

**Recommendation:** Apply this requirement only to government-provided services (contracted public transport), as it may be impractical for private operators to provide alternative formats for all information.

Accessible format types need to be clearly defined to give expected guidance for users of public transport and also operators providing the service.

#### Section 27.2 Direct assistance to be provided

The amendment requires operators to provide information in a passenger's preferred format or, if not available, offer direct assistance. Rarely requested formats must be supplied promptly, with direct assistance provided in the interim.

**Recommendation:** Apply this requirement only to government services. Clarify that "preferred format" should be limited to recognised standard formats to ensure practical and consistent implementation.

Format types need to be clearly defined to give expected guidance for users of public transport and also operators providing the service.

#### Section 27.3 Size and format of printing on request

The amendment requires operators to provide large print versions of any transport document upon request, using at least 18-point sans serif semi-bold or bold font, left-aligned with a ragged right margin, and either black text on a light background or a luminance contrast of at least 75%.

**Recommendation:** Apply this requirement only to government-provided services to ensure clarity and manageability.

#### Section 27.5 Braille in embossed print format

The amendment requires that printed information requested in braille must be provided in Grade 2 (contracted) braille unless Grade 1 (uncontracted) is specifically requested. If braille is provided proactively, both Grade 1 and Grade 2 must be offered in separate volumes, following the Rules of Unified English Braille.

**Recommendation:** Apply this requirement only to government-provided services to ensure practical implementation and manageable compliance.

#### Section 27.6 Information about transport services

The amendment requires that on transport services with multiple stops:

- Next-stop information must be visible from priority seats and allocated spaces.
- Next stop audible announcements must be provided and must work with hearing augmentation systems.
- Announcements must specify the correct side, door, or gate for disembarking when this changes during the journey.

**Recommendation:** This amendment should apply only to government-operated services.

#### Section 27.8 Information provided during disruptions

The amendment requires operators to provide information about planned service disruptions and alternative travel options:

- In multiple formats and with as much advance notice as reasonably possible.
- If advance notice cannot be provided, direct assistance must be offered.
- These requirements do not apply when control of the service is lost due to emergency events (e.g., fire evacuation, police operations).
- The provision takes effect after the 5-year transitional period (section 35.24).

**Recommendation:** Support the amendment but ensure it applies only where operators retain operational control and that expectations for "multiple formats" and "reasonable notice" are clearly defined to avoid disproportionate burdens on providers.



### Section 27.9 Communicating accessibility features of conveyances, premises and infrastructure

The amendment requires operators to:

- Identify access barriers across the transport network and publish information about the solutions.
- Provide clear, consistent public information on the accessibility features and level of access available for each conveyance, premises, or piece of infrastructure.

**Recommendation:** Limit the application of this amendment to government-operated services, as they have the capacity and responsibility to manage system-wide accessibility reporting.

### Section 27.10 Information and communication technology must be accessible

Information and communication technology (ICT) that is intended for public use by any operator or provider must be accessible to people with disabilities. However, the proposed amendment would limit this requirement so that it applies only to government-provided services, rather than all public ICT services.

**Recommendation:** To ensure equitable access and avoid creating gaps in accessibility, the requirement should not be narrowed exclusively to government services. Limiting accessibility obligations to government providers risks excluding private-sector services that are widely used by the public, potentially undermining the intent of accessibility standards.

- If a narrowed scope is still necessary for legislative or operational reasons, the amendment should at least ensure:
- Clear definitions of what qualifies as a “government service,”
- Mechanisms encouraging or incentivising accessibility in non-government public ICT services, and

## **Amendments to Part 28 (booked signs)**

### Section 28.4 Accessible seats to be available for passengers with disabilities

Current regulations require that accessible seats are reserved for passengers with disabilities, and that unreserved accessible seats may only be allocated to other passengers once all standard seats are booked.

The proposed amendment would:

- Allow passengers with disabilities to book seats suited to their travel needs, unless already booked.
- Require that accessible seating be available in all travel classes where multiple classes exist.
- Apply these requirements after a 5-year transitional period (Sections 3 and 4).

Concerns include practical implementation, as some services do not allow advance booking, and the amendment is suggested to apply only to government services.

### **Recommendation:**

Practical feasibility: Consider how services without advance booking will accommodate these requirements; operational guidance may be needed.

Scope: Limiting the amendment to government services could exclude many passengers using private transport providers, reducing overall accessibility.

Implementation support: Provide a clear framework for reserving accessible seating in each travel class and mechanisms to prevent exclusion or booking conflicts.

A broader application beyond government services is recommended to ensure equitable access for all passengers with disabilities.

## **Amendments to Part 31 (priority seating)**

### Section 31.1 Allocation of priority seating

The 5-year transitional timeframe limited by the current shortage of skilled labour to carry out the work to change the 26,000 in-service public transport buses today. Over 5 years, that's 21 buses per day.

With recognised skills shortage in the industry (we are currently short of 28,000 skilled technicians and projected to be 79,000 by 2030<sup>3</sup>) sadly it's a target limited by the availability of people capable to achieve it.

**Recommendation:** Change the transitional period to 10 years to be practically achievable.

This would apply to any other transitional changes to existing in-service buses and coaches.

### Section 31.2 Appearance and signage

The same concern and recommendations raised in section 31.1 above also apply to this section.

### Section 31.3 Location of priority seats in conveyance

The same concern and recommendations raised in section 31.1 above also apply to this section.

### Section 31.4 Accommodation of assistance animals

The amendment requires that space under priority seats be provided to accommodate assistance animals on buses, ferries, rail cars, trams, and light rail. This requirement does not apply to premises or infrastructure and will take effect after a five-year transitional period.

Concerns include:

- The type and size of assistance animals.
- Whether animals can practically fit under the seat given size constraints.

### **Recommendation:**

- Provide clear guidance or standards on the minimum dimensions and types of assistance animals to ensure feasibility.
- Consider alternative seating arrangements for larger assistance animals that cannot fit under priority seats.
- Review the practicality of implementation to avoid unintended exclusion of passengers who rely on assistance animals.

### Part 31A Strategies and programs to prevent harassment or victimisation of persons with disability

The amendment requires:

- Space under priority seats for assistance animals.

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<sup>3</sup> [Automotive Research Bulletin - September 2025 | Mining and Automotive Skills Alliance](#)

- Operators and providers to implement staff awareness and training programs regarding harassment and victimisation of persons with disabilities, including detecting and addressing harassment in public transport.
- Applicability to all conveyances, premises, and infrastructure after a five-year transitional period.

**Recommendation:**

- Limit the amendment's operational requirements to government services.
- Provide clear guidance and boundaries on staff intervention in harassment situations, aligning with non-confrontation industry standards.
- Ensure training programs are delivered via recognized RTOs to maintain safety and consistency.
- Clarify expectations for "addressing" harassment to avoid placing frontline staff in unsafe situations.

**Amendments to Part 33 (compliance)**

Section 33.4 Assistance during boarding and alighting

The amendment requires that operators or providers consult with passengers with disabilities or relevant representative organisations regarding any proposals for equivalent access.

**Recommendation:**

- Limit the consultation requirement to government-operated services to ensure manageability and accountability.
- Ensure consultation processes are structured, documented, and ongoing, allowing meaningful input from disability representatives.
- Provide guidance on how and when consultation should occur to avoid tokenistic engagement.

Section 33.5 Assistance while travelling

The amendment requires that operators and providers demonstrate that equivalent access to public transport is provided without discrimination, to the greatest extent possible.

**Recommendation:**

- Restrict the requirement to government-operated services for clarity and enforceability.
- Establish clear criteria or benchmarks for demonstrating non-discriminatory access, ensuring transparency and accountability.
- Provide guidance on monitoring and reporting to verify compliance with equivalent access standards.

## Recommendations

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The bus industry is committed to improving accessibility outcomes. With the right support and a pragmatic implementation framework, the 2025 Amendments can deliver meaningful long-term benefits for people with disability, operators, and the broader public transport network.

We appreciate the opportunity to contribute and provide feedback. BIC respectfully offers the following recommendations to support clarity on the following matters and look forward to continued engagement should any questions arise.

1. **Implementation Approach**
  - Recognise the alternative suggestions for buses and coaches on key items.
  - Transition existing fleets over realistic, costed timelines.
2. **Clear, Practical Guidance**
  - Publish detailed design specifications and operational guidance early.
  - Ensure non-regulatory tools are stable, unambiguous, and accessible to all stakeholders.
3. **Financial and Operational Support**
  - Provide government funding or incentives to support vehicle upgrades and infrastructure improvements.
  - Provide operational guidance material to provide public transport users a better experience.
4. **Capacity Building and Training**
  - Deliver staff and operator training on accessibility requirements and compliance.
  - Promote awareness of responsibilities under the amended Standards.
5. **Ongoing Engagement**
  - Maintain collaborative dialogue between government, operators, and suppliers.
  - Use feedback loops to monitor challenges, successes, and lessons learned during implementation.
6. **Impact Monitoring and Evaluation**
  - Model operational and financial impacts prior to rollout.
  - Establish mechanisms to track sector readiness, compliance, and long-term accessibility outcomes.

## Contact

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