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Mr Michael Paine
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By email: mpaineau@me.com

Dear Mr Paine

National Seniors Australia Response: Australian Road Rules for Motorised Wheelchairs and Other Motorised Mobility Devices Discussion Paper

National Seniors Australia welcomes the opportunity to provide input into the development of a nationally consistent regulatory framework for the use of motorised wheelchairs and other Motorised Mobility Devices (MMD). Such a framework will provide safer interactions between pedestrians and other road and footpath users.

National Seniors is the largest organisation representing Australians aged 50 and older, with around 200,000 members nationally. We provide a well-informed and representative voice on behalf of older Australians and contribute to public education, debate and community consultation on issues of direct relevance to them.

Ensuring safety and security, enhancing social engagement and maintaining independence are National Seniors main priorities for any new rules implemented to govern the use of MMDs. We believe that the use of such devices significantly enhances quality of life for older Australians who have limited mobility or who no longer drive. Research by National Seniors reveals that transport difficulties, such as access and mobility, affect 20% of people aged 55 and older resulting in higher levels of social disengagement and lower levels of wellbeing.

The long standing paradigm of relocating and adapting to more age appropriate accommodation later in life is giving way to new models of ageing in place where the benefits of remaining connected to local community are recognised and appreciated. As a result, government services and programs are increasingly shifting focus to provide aged care packages to a person within their own community. This shift, along with the projected increase of Australians aged 65 and older from 13% in 2010

to 23% of Australia's population in 2050, means that there will be a greater number of people residing and ageing within the community and potentially accessing alternative modes of transport.

For these reasons, National Seniors supports the formation and introduction of separate vehicle standards for MMDs within the Australian Road Rules (ARR). In general, regulations and guidelines for the use of MMDs will establish expectations and responsibilities for use and safety. Clarification of MMD use and safety is especially important within areas with high levels of foot traffic.

National Seniors recommends that MMD regulations offer guidelines for safe use in and around public transportation and be formed in harmony with the Australian *Disability Standards for Accessible Public Transport 2002*. We also support a maximum general speed of 10km an hour and 5km an hour in pedestrian areas.

Consumer protection is of great importance for National Seniors, with particular regard to marketing tactics and the purchases of MMDs. In the majority of instances older Australians are purchasing MMDs due to a decline in health and mobility and/or changes to driving status. We also appreciate that these changes are not typically welcomed and that older Australians are vulnerable to pressure to purchase an MMD that is not appropriate for their needs or the environment in which the MMD will be operated.

Accordingly, we support the application of a prominent label on MMDs that alerts a potential buyer to the device's compliance with Australian road rules and disability standards. We also suggest that a system to accredit MMD retailers be explored.

We also suggest development of a fact sheet that briefly states road rules for MMDs at the time of purchase to ensure that buyers and their families are fully informed. These fact sheets could be the responsibility of Austroads and updated accordingly as rules change. Retailers would then be responsible for downloading and printing these and providing them to the buyer on purchase.

National Seniors supports the need for people of all ages operating a MMD to hold a medical certificate. However, we do not support proposals for assessments to be undertaken by an Occupational Therapist (OT). These assessments are onerous and costly, especially for those older Australians living on fixed incomes. An OT assessment may be equivalent to the fortnightly full age pension. National Seniors suggests that medical assessments be based on sight, hearing and cognitive ability and be undertaken with the person's regular general practitioner.

Currently, a person's level of mobility is the principal measure for a medical certificate for use of a MMD. National Seniors suggests medical assessments should not solely focus on a person's mobility, but need to consider a person's capacity to operate the MMD, their quality of life and any additional benefits to the potential user.

National Seniors looks forward to providing further input on the nationally consistent regulatory framework for the use of motorised wheelchairs and other Motorised Mobility Devices.

Yours sincerely

Michael O'Neill
Chief Executive Officer