

7 July 2023

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Director Disability and Transport Standards
Department of Infrastructure, Transport, Regional Development,
Communications & the Arts
GPO Box 594
CANBERRA ACT 2601

Via email: DisabilityTransport@infrastructure.gov.au

Review of the *Disability Standards for Accessible Public Transport 2002*

Dear ██████████,

I am writing to you today to express the views of the airport sector on the Department of Infrastructure, Transport, Regional Development, Communications and the Arts' (the Department's) Stage 2 review of the *Disability Standards for Accessible Public Transport 2002* (the DSAPT). The Australian Airports Association (AAA) represents the interests of more than 340 airports and aerodromes across Australia, in addition to 150 corporate members supplying products and services to airports.

The AAA's submission to the 2022 Review builds on the submission responding to the DSAPT Stage 2 Consultation Regulatory Impact Statement (CRIS) previously provided to the Department in August 2022, which is at Attachment A. It also provides a partial response to the letter sent to the aviation industry in February 2023 by the Chair of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with a Disability (the Hon. Ronald Sackville AO KC).

In addressing the two key questions from the Department's Discussion Paper on the DSAPT (What the industry's view is of the DSAPT and its experience with people accessing and using public transport), the AAA's submission makes the following points:

Airports have a high level of regulatory maturity – The airport sector is already one of the most heavily regulated parts of the Australian economy, with existing compliance requirements spanning areas including:

- transport security,
- aviation safety,
- critical infrastructure security, and
- economic regulation;

in addition to ensuring the accessibility of premises and vehicles. Airports that host Regular Public Transport (RPT) services already comply with applicable accessibility regulations, including the *Disability (Access to Premises - buildings) Standards 2010* (the Premises Standards) and the Building Code of Australia.

Through the AAA, airports are engaged with the Department's *Aviation Access Forum* and actively participated in the *National Accessible Transport Taskforce*. This engagement allows airports to

participate in exchange of information between disability sector organisations, the aviation industry and Australian governments to further improve disability access across the industry.

Airports are evolving to meet their customer's needs

As customer-focused businesses, airports are focused on creating inclusive environments across the country for passengers of all abilities, often providing facilities and programs above and beyond regulatory requirements. For example, Australian airports have proactively adopted the Hidden Disability Program to help provide customers with a predictable travel experience – no matter the destination or their abilities. The Hidden Disability Program was developed by the AAA in conjunction with Aspect, one of Australia's largest service providers for people on the autism spectrum to create a genuinely inclusive airport environment for passengers and staff.

Airports lead the aviation industry on inclusion of people with disabilities

Airports continue to work with the broader aviation industry, including government agencies and other stakeholders that operate at airports, to share information so it can continue to promote inclusive and consistent practices. For example, the AAA's representations to the Department of Home Affairs ensured consistent, people-centred guidance is included in their draft *Aviation Screening Notice 2023* directing security screeners to ensure security screening of people with disabilities (including people travelling with assistance animals or carers, people with mobility impairments or hidden disabilities) is undertaken sensitively and with dignity while maintaining security outcomes.

Airports are a 'system of systems'

Unlike other nodes in Australia's public transport network, most airports are a 'system of systems' where a range of industry participants operate to deliver services to passengers. For example, airports directly employ staff who operate the airport, along with contracted staff undertaking security screening and other services such as cleaning. Airline tenants on the airport may also employ contractors to provide terminal services, baggage handling and ground operations. Third parties are also involved in other aspects of airport operations including parking, car rental and ground transport.

In this environment, the ability for the aviation industry to provide a wholly accessible journey remains challenging, particularly where interfaces between industry participants exist, including:

- Interface 1: the 'kerbside' interface between ground transport and the arrivals/departures area,
- Interface 2: the 'landside' interface at check-in and the baggage drop/collection,
- Interface 3: the 'airside' interface at the security screening point and the terminal, and;
- Interface 4: the 'gateside' interface between terminal and aircraft.

Many of the incidents reported in the media and elsewhere regarding people with disabilities and their aviation experiences do take place on airports but tend to involve industry participants other than airport operators, particularly incidents occurring at Interfaces 1, 2 and 4 as well as on-board aircraft. The AAA views that Home Affairs' draft ASN once published will help reduce the number of incidents occurring at the security screening point at Interface 3.

Concluding remarks

The vast majority of Australia's aviation passengers will pass through major airports, where infrastructure and services are being continuously upgraded to meet and exceed the requirements of

the DSAPT and other accessibility standards. However, the ability of airports to provide consistent levels of compliance at all RPT airports will remain challenging, particularly at low-volume regional RPT airports. Some special consideration should be given to these regional airports in meeting DSAPT compliance goals.

Should you require further information regarding this letter, please contact Mr. Scott Martin, Director of Policy & Advocacy on [REDACTED] [REDACTED]

Yours sincerely,

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James Goodwin

Chief Executive