

Mr Jason Lange  
Executive Director  
Office of Best Practice Regulation  
Department of the Prime Minister and Cabinet  
1 National Circuit  
BARTON ACT 2600

Dear Mr Lange

## **Regulation Impact Statement – Reforms for the Disability Standards for Accessible Public Transport 2002 – First Pass Final Assessment**

I am writing in relation to the attached Regulation Impact Statement (RIS) prepared for Reforms for the Disability Standards for Accessible Public Transport 2002 (Transport Standards).

I consider the RIS meets the requirements set out in the *Australian Government Guide to Regulatory Impact Analysis* and is consistent with the six principles for Australian Government policy makers.

In particular, I note the RIS addresses the seven RIS questions:

- What is the policy problem you are trying to solve?
  - The Transport Standards were implemented in 2002 and seek to remove discrimination for people with disability in relation to public transport services to provide equality and independence.
  - The Transport Standards are not optimal in their current form and need to be modernised to ensure they are efficient and effective, fit-for-purpose and meet the current needs of Australian society. It is recognised there is currently insufficient clarity, flexibility or guidance for operators and providers of public transport to fulfil their obligations under the *Disability Discrimination Act 1992* which is leading to sub-optimal outcomes for people with disability.
- Why is government action needed?
  - This RIS provides the opportunity to reform 16 areas of the Transport Standards, as well as minor definitional amendments and updates to Australian Standards references throughout the Standards.
  - Government action is needed to implement regulation where consultation and analysis identified that guidance alone would be insufficient to address the discriminatory outcomes that have been recognised.
  - Government action is also needed to help simplify the regulatory landscape through alignment between the Transport Standards and the Disability (Access to Premises – Buildings) Standards 2010 (also known as the Premises Standards).
- What policy options are you considering?
  - For 15 areas of reform, three viable policy options have been presented in the RIS. Two of the 15 areas of reform have multiple regulatory sub-options. Each reform area includes a status quo option, a non-regulatory option and a regulatory option.

- There is one area of reform which only includes a status quo option and a non-regulatory option. This is because there is further research to be undertaken in relation to mobility aid safety. Regulatory options for this reform area will be included as part of a second stage of the reform process.
- All of the non-regulatory reform options proposed in the RIS would be achieved through the provision of new guidance or improvements to existing guidance.
- What is the likely net benefit of each option?
  - The recommended policy options will improve the accessibility of Australia's public transport networks and have been assessed as providing the greatest opportunity to remove discrimination against people with disability in relation to public transport services.
  - Better accessibility will help improve the confidence, certainty of travel and safety of people with disability, and will help to reduce barriers for people with disability to use public transport, leading to increased participation in work and community life.
  - The net benefits of each option are outlined at [Appendix A](#).
  - A regulatory cost impact was estimated for each regulatory option. The total estimated regulatory impact for all recommended options is \$30.9 million per year (including \$14.2 million ongoing yearly costs and \$16.7 million upfront costs).
- Who did you consult and how did you incorporate their feedback?
  - A Consultation Regulation Impact Statement (Consultation RIS) was released on 12 February 2021 to seek public feedback on the proposed policy options put forward in this RIS. The disability community, governments, transport industry and the wider community were invited to respond. The public submissions period closed on 23 April 2021.
  - Stakeholders were provided a number of options to submit responses. These included formal written submissions, phone, online surveys and professionally facilitated online forums.
  - The Department received 39 formal written submissions:
    - 17 from disability community organisations
    - 7 from state, territory and local governments
    - 7 from individuals
    - 7 from operators of public transport
    - 1 from a university.
  - The Department also received 108 survey responses from the disability community, general public and transport operators.
  - 51 participants from all stakeholder groups participated in the online forums.
  - Consultation feedback was used to inform the drafting of this RIS, with the recommended options identified based on a combination of the consultation findings and the cost-benefit analysis. In some cases, the final policy options in this Decision RIS were refined from those in the Consultation RIS based on this formal stakeholder feedback.
- What is the best option from those you have considered?

- The recommended package of options includes both regulatory and non-regulatory options and advice on how each recommended option meets the intended outcome.
- Regulation was generally preferred where there was clear support across stakeholder groups or where the non-regulatory or status quo options would not secure the intended outcome.
- Where it was identified that guidance would also lead to the intended outcome, the non-regulatory option was preferred. Additionally, where there was a lack of data or certainty that regulation would secure the outcome, guidance was preferred as a first step.
- How will you implement and evaluate your chosen option?
  - The implementation arrangements through legislative amendments, including whether amendments will be applied retrospectively or prospectively, is being considered as part of the second stage of reforms. A proposal for implementation is being developed through the Stage 2 RIS process and is expected to be brought to Transport Ministers in May 2023.
  - A compliance reporting framework for the Transport Standards is also being considered as part of the second stage of the reform process.
  - Finally, the effectiveness of these reforms will be assessed through the 5 yearly statutory reviews of the Transport Standards.

I note that the Decision RIS includes a description of the status of the RIS at each major decision point in the proposal's development. Notably, in September 2021 the National Accessible Transport Steering Committee, with representation across the Australian Government, state governments and the Australian Human Rights Commission, endorsed the draft Decision RIS to progress to Ministers for decision.

I confirm the RIS identifies the regulatory costs of each option. There are no identified offsets for this proposal.

I submit the RIS to the Office of Best Practice Regulation for formal First Pass Assessment.

If you have any further queries, please do not hesitate to contact me.

Yours sincerely



Paula Stagg  
Assistant Secretary, Land Transport Policy Branch  
Department of Infrastructure, Transport, Regional Development and Communications  
7 October 2021

**Appendix A**

Note – the shaded option represents the preferred option proposed in the Decision RIS.

<b>Reform Area</b>	<b>Status Quo</b>	<b>Non-Regulatory</b>	<b>Regulatory</b>
<p><b>Staff Training</b></p> <p>Whether the development of a framework for staff training will improve the public transport experience of people with disability.</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>This option involves providing guidance to operators and providers on the provision, development and implementation of staff training.</p> <p>The net benefits of this option will vary depending on the extent to which the guidance is followed. Benefits may include improved capability to provide adequate staff training and improved interactions between staff and passengers. Improved or additional staff training will impose costs on operators and providers.</p> <p>This option will partially address any discriminatory outcomes that are presently occurring.</p>	<p>This option would set performance requirements for the provision, development and implementation of staff training.</p> <p>Benefits will include improved capability to provide adequate staff training and improved interactions between staff and passengers, reducing a major barrier to public transport usage. Improved or additional staff training will impose costs on operators and providers.</p> <p>This option will provide the greatest opportunity to reduce discrimination against people with disability.</p>
<p><b>Mobility Aid Safety</b></p> <p>Whether further information on safety measures is required to better contain the movement of mobility aids on</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p>	<p>This option involves providing guidance concerning mobility aid safety on conveyances.</p> <p>The net benefits of this option will vary depending on the extent to which the guidance is followed. The guidance will improve the safety of mobility aids on conveyances, reducing a barrier to public transport usage for mobility aid users. These</p>	<p>No regulatory option is presented, as more research is needed before a suitable regulatory option can be developed.</p>

<b>Reform Area</b>	<b>Status Quo</b>	<b>Non-Regulatory</b>	<b>Regulatory</b>
buses, light rail and trams while they are in motion.	This option will not address any discriminatory outcomes that are currently occurring.	<p>safety features will also benefit other passengers around the allocated space. There will be costs associated with upgrading existing assets or procuring assets with greater safety features.</p> <p>This option will help to address any discriminatory outcomes that are presently occurring.</p>	
<p><b>Priority Seating</b></p> <p>Changing the way we calculate the number of priority seats required on a public transport vehicle to accommodate the increasing numbers of passengers requiring priority seating.</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>This option involves providing additional guidance on good practice designs for priority seating</p> <p>The net benefits of this option will vary depending on the extent to which the guidance is followed. Guidance will improve the provision of priority seating, making public transport more accessible to users who rely on priority seats, at a low cost to operators and providers.</p> <p>This option will partially address any discriminatory outcomes that are presently occurring.</p>	<p>This option would set prescriptive and performance-based requirements for priority seats in conveyances, including number, location and identification of seats, the accommodation of assistance animals.</p> <p>The net benefits will improve the provision of priority seating, making public transport more accessible to users who rely on priority seats, at a low cost to operators and providers.</p> <p>This option will address any discriminatory outcomes that are presently occurring.</p>
<p><b>Allocated Spaces</b></p> <p>Whether further clarity is required to ensure allocated</p>	This option involves no regulatory or non-regulatory change.	This option would provide additional guidance and informative material to provide advice on good practice design for access paths, manoeuvring spaces and allocated spaces in conveyances.	This option would set prescriptive and performance requirements for access paths, manoeuvring areas and allocated spaces in conveyances, including specifying particular

<b>Reform Area</b>	<b>Status Quo</b>	<b>Non-Regulatory</b>	<b>Regulatory</b>
spaces are clear of obstructions and functional and are exclusively reserved for mobility aids.	<p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>Net benefits will vary depending on the extent to which the guidance is followed. Public transport users will benefit from the changes to allocated spaces. This option is likely to have greater costs for conveyances that require retrofitting, with smaller additional costs for new conveyances.</p> <p>This option will partially address any discriminatory outcomes that are presently occurring.</p>	<p>objects that are permitted to intrude into the vertical space.</p> <p>Public transport users will benefit from the changes to allocated spaces. The accessibility of access paths, manoeuvring areas and allocated spaces in conveyances would be maximised. Regulatory clarity will be improved.</p> <p>This option is likely to have greater costs for conveyances that require retrofitting, with smaller additional costs for new conveyances.</p> <p>This option provides the greatest opportunity to reduce discrimination against people with disability.</p>
<p><b>Digital Information Screens</b></p> <p>How to ensure digital information screens and design requirements meet the needs of people with disability.</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes</p>	<p>This option would provide guidance on digital information screens and design considerations.</p> <p>Net benefits will vary depending on the extent to which the guidance is followed. Digital information screens may be installed more frequently, with information presented in a more accessible format. Costs associated with installing and maintaining digital information screens may be incurred.</p>	<p>This option would set performance requirements on digital information screens and design requirements, based on the 1428 suite of Australian Standards.</p> <p>Digital information screens will be installed in appropriate locations, with information presented in a more accessible format. Digital information screens will present information more consistently across jurisdictions. Costs</p>

Reform Area	Status Quo	Non-Regulatory	Regulatory
	that are currently occurring.	This option will partially address any discriminatory outcomes that are presently occurring.	<p>associated with installing and maintaining digital information screens will be incurred.</p> <p>The regulatory option will provide the greatest opportunity to reduce discrimination against people with disability.</p>
<p><b>Lifts</b></p> <p>Amending lift accessibility requirements to improve safety and accessibility and to align with the Premises Standards 2010 and the National Construction Code.</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>This option would build on current guidance to provide more specific detail on additional lift accessibility enhancements to align with the Premises Standards and National Construction Code (NCC) to ensure best practice for accessibility.</p> <p>The net benefits will vary depending on the extent to which guidance is adopted. The guidance may improve the accessibility of a select number of public transport lifts, and may reduce accessibility issues caused by out of service lifts. Retrofitting costs may be incurred if lifts are upgraded.</p> <p>This option will assist operators and providers to reduce discriminatory outcomes.</p>	<p>This option would update the requirements in the Transport Standards to provide more specific detail on additional lift accessibility enhancements to align with the Premises Standards and NCC. This option would also provide guidance on lift maintenance and downtime.</p> <p>The new requirements will improve regulatory clarity by aligning with other legislation, and may improve the accessibility of a select number of public transport lifts. Guidance may reduce accessibility issues caused by out of service lifts. Retrofitting costs may be incurred if lifts are upgraded.</p> <p>The regulatory approach will provide the greatest opportunity to reduce discrimination against people with disability.</p>

Reform Area	Status Quo	Non-Regulatory	Regulatory
<p><b>Website accessibility</b></p> <p>Adopting a minimum standard for website accessibility to improve the delivery of service information to people through online systems.</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>This option would build on current guidance to include advice from the Australian Government on minimum website design and recommend a minimum level of compliance with WCAG 2.0AA.</p> <p>The net benefits will vary depending on the extent to which guidance is adopted. Compliance with WCAG 2.0AA will improve accessibility for all public transport users seeking information online.</p> <p>Complying with WCAG 2.0AA may result in additional costs.</p> <p>This option will partially address any discriminatory outcomes that are presently occurring</p>	<p>This option would set prescriptive requirements for website design including meeting the current version (2.1) of WCAG AA.</p> <p>The net benefits will improve accessibility of websites for all users to a modern standard, aligning with industry standards and best practice, including on mobile devices. Websites will be consistent across jurisdictions and industries.</p> <p>There will be costs associated with upgrading to WCAG 2.1AA.</p> <p>This option will address any discriminatory outcomes that are presently occurring.</p>
<p><b>Communication during service disruption</b></p> <p>Establishing a framework for public transport operators and providers to communicate effectively, and in a</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes</p>	<p>This option would improve guidance to better articulate requirements for communication during service disruption to promote best practice.</p> <p>The net benefits will vary depending on the extent to which guidance is adopted. Accessibility, clarity and consistency of communication may be improved. A barrier to public transport use by people with disability may be alleviated.</p>	<p>This option would set new performance based standards specifying requirements for communication during planned and unplanned disruptions, including the format of the information provided.</p> <p>The net benefits will see improved accessibility of public transport. People are likely to feel reassured during service disruption, improving their willingness to use public transport.</p>



<b>Reform Area</b>	<b>Status Quo</b>	<b>Non-Regulatory</b>	<b>Regulatory</b>
variety of formats, during planned and unplanned disruptions.	that are currently occurring.	<p>There may be costs associated with changing communication practices during service disruption.</p> <p>This option may partially address any discriminatory outcomes that are presently occurring</p>	<p>There may be costs associated with changing communication practices during service disruption.</p> <p>This option will address any discriminatory outcomes that are presently occurring and prevent future discriminatory outcomes.</p>
<p><b>Gangways</b></p> <p>How to clarify the distinct requirements of gangways used to access ferries including the effects of tidal changes on access.</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>This option would improve guidance to better articulate performance requirements and good practice designs for gangways.</p> <p>The net benefits will vary depending on the extent to which guidance is adopted. The guidance will improve clarity for gangway designers and may improve the accessibility and safety of gangways. There may be costs associated with upgrading gangways based on provided guidance.</p> <p>This option will partially address any discriminatory outcomes that are presently occurring.</p>	<p>This option would amend the prescriptive requirements in the Transport Standards for gangways, and provide additional guidance to support the amended regulations.</p> <p>The net benefits are associated with improved regulatory clarity and certainty for gangway designers and improved accessibility of gangways for passengers.</p> <p>This option will address any discriminatory outcomes that are presently occurring.</p>
<p><b>Assistance animal toileting facilities</b></p> <p>Including requirements to</p>	<p>This option involves no regulatory or non-regulatory change.</p>	<p>This option would provide guidance on best practice design and implementation of assistance animal toileting facilities. This would expand on the 'beyond compliance' case study concerning</p>	<p>This option would set prescriptive and performance requirements for operators and providers to ensure public transport infrastructure and premise have suitable locations to toilet assistance animals.</p>

Reform Area	Status Quo	Non-Regulatory	Regulatory
<p>provide conveniently located assistance animal toileting areas within, or adjacent to, key public transport infrastructure.</p>	<p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>Brisbane Airport in the current version of the guide.</p> <p>The net benefits will vary depending on the extent to which guidance is adopted. Assistance animal toileting facilities, where installed, will improve accessibility of public transport for people with assistance animals. Guidance will encourage best practice without mandating costly audits. There will be costs associated with auditing networks for locations to toilet assistance animals and install assistance animal toileting facilities.</p> <p>The non-regulatory option will provide a satisfactory opportunity to reduce discrimination against people with disability.</p>	<p>The regulatory approach will reduce discriminatory outcomes but may be infeasible, unclear or impractical to comply with in practice.</p> <p>This option may not result in operators and providers complying with the requirements to the fullest extent possible. As a result, the proposed regulatory amendment is not a satisfactory opportunity to eliminate discrimination.</p>

Reform Area	Status Quo	Non-Regulatory	Regulatory
<p><b>Emergency egress</b></p> <p>Developing emergency egress provisions for people with disability in relation to public transport infrastructure, such as bus stops.</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>This option would provide guidance on emergency egress related to public transport infrastructure.</p> <p>The net benefits will vary depending on the extent to which guidance is adopted. Best practice guidance will assist operators and providers to ensure their networks are safe in emergency situations. Provision of two egress routes will improve safety in emergency situations and ensure equal access to safe egress for people with disability.</p> <p>There will be costs associated with upgrading existing infrastructure.</p> <p>This option will satisfactorily address any discriminatory outcomes that are presently occurring.</p>	<p>This option would set high level performance requirements for egress from infrastructure including number and size of egress routes.</p> <p>The net benefits are challenging to calculate, as it is unclear what proportion of public transport infrastructure does not comply with these requirements. The provision of two egress routes will improve safety in emergency situations however, may not always be practical to implement. There will be costs associated with upgrading existing infrastructure.</p> <p>Mandating requirements to provide additional accessible emergency egress routes will reduce discrimination against people with disability by ensuring equal access to safe egress in an emergency.</p>
<p><b>Fit-for-purpose accessways</b></p> <p>Including requirements so ramps and walkways provide fit-for-purpose</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p>	<p>This option would provide guidance aimed to ensure access paths are fit for purpose and meet universal design principles.</p> <p>The net benefits will vary depending on the extent to which guidance is adopted. Design of accessways will be improved where guidance is adopted. Costs may be associated with retrofitting</p>	<p>This option would introduce new prescriptive and performance based elements for access paths.</p> <p>The net benefits relate to improved design of accessways. Barriers to safe and efficient travel identified by people with disability will be reduced, by ensuring accessways are designed</p>

<b>Reform Area</b>	<b>Status Quo</b>	<b>Non-Regulatory</b>	<b>Regulatory</b>
<p>accessways during peak times and emergency egress, and to deter their misuse as stopping areas.</p>	<p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>or upgrading sites where accessways are not fit for purpose.</p> <p>This option will satisfactorily address any discriminatory outcomes that are presently occurring.</p>	<p>and monitored with consideration of accessibility requirements and provided at an equal level of service to stairs. Costs will be associated with retrofitting or upgrading sites where accessways are not fit for purpose. The costs associated with this option are likely to exceed the benefits derived.</p> <p>This option may address any discriminatory outcomes that are presently occurring.</p>
<p><b>Wayfinding</b></p> <p>How to address inconsistencies between the Transport Standards and the National Construction Code for wayfinding.</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>This option would provide improved guidance on consistent and best practice wayfinding features to support independent transport usage.</p> <p>The net benefits will vary depending on the extent to which guidance is adopted. Operators will have flexibility to adopt wayfinding solutions where appropriate, which may impose increased costs. Improved wayfinding will increase accessibility and reduce barriers to public transport usage.</p> <p>This option may address any discriminatory outcomes that are presently occurring to the extent that guidance is followed.</p>	<p>This option would amend the Transport Standards to address inconsistencies between the Transport Standards, the NCC and the Premises Standards.</p> <p>The net benefits are associated with improved accessibility and consistency of wayfinding for passengers and improved regulatory clarity by aligning with the Premises Standards and NCC.</p> <p>Costs will be associated with retrofitting or upgrading sites where existing wayfinding is not compliant.</p> <p>This option provides the greatest opportunity to reduce discrimination against people with disability.</p>

Reform Area	Status Quo	Non-Regulatory	Regulatory
<p><b>Tactile ground surface indicators (TGSIs)</b></p> <p>If clarity is required about the use of directional TGSIs in public transport environments.</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>This option would provide improved guidance on the use, purpose and intention of using TGSIs, including any unintended consequences of their use.</p> <p>The net benefits will vary depending on the extent to which guidance is adopted. Operators will have flexibility to adopt TGSIs designs and upgrades where appropriate, which may impose increased costs. Improved TGSIs will increase accessibility and reduce barriers to public transport usage for passengers.</p> <p>This option may address any discriminatory outcomes that are presently occurring to the extent that guidance is followed.</p>	<p>This option would add prescriptive requirements for directional TGSIs and include updated references to AS1428.4.1:2009.</p> <p>The net benefits are associated with improved accessibility and consistency of wayfinding for passengers and resolving conflict between standards governing shared environments by providing stronger and clearer regulations.</p> <p>Costs will be associated with retrofitting or upgrading sites where existing TGSIs are not compliant.</p> <p>This option provides the greatest opportunity to reduce discrimination against people with disability.</p>
<p><b>Passenger loading areas</b></p> <p>Including requirements for the design and delivery of accessible passenger loading areas such as drop</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes</p>	<p>This option would build on existing guidance on best practice design and implementation of passenger loading areas.</p> <p>The net benefits will vary depending on the extent to which guidance is adopted. Providers will have flexibility to adopt passenger loading area designs and upgrades where appropriate, which may impose increased costs. Improved passenger loading areas will increase accessibility and</p>	<p>This option would provide more detail for the design requirements of accessible passenger loading areas, including prescribing the number of accessible taxi ranks required.</p> <p>The net benefits relate to providing a clear regulatory framework to eliminate discrimination relating to passenger loading areas. Consistent terminology, clear design</p>

<b>Reform Area</b>	<b>Status Quo</b>	<b>Non-Regulatory</b>	<b>Regulatory</b>
off/pick up points and taxi ranks.	that are currently occurring.	<p>reduce barriers to public transport usage for passengers.</p> <p>This option may address any discriminatory outcomes that are presently occurring to the extent that guidance is followed.</p>	<p>standards will provide clarity to all stakeholders.</p> <p>The regulatory option provides the greatest opportunity to reduce discrimination against people with disability.</p>
<p><b>Provision of information in multiple formats</b></p> <p>Including provisions ensuring public transport information is provided in multiple formats and not solely through online methods.</p>	<p>This option involves no regulatory or non-regulatory change.</p> <p>No net benefits are anticipated.</p> <p>This option will not address any discriminatory outcomes that are currently occurring.</p>	<p>This option would provide guidance on the range of formats that public transport information should be provided in.</p> <p>The net benefits will vary depending on the extent to which guidance is adopted. Operators will have flexibility to adopt guidance where they see fit. Where guidance is followed, passengers will have greater access to public transport information. There may be some costs associated with following the guidance, depending on operator practices and procedures.</p> <p>This option may address any discriminatory outcomes that are presently occurring to the extent that guidance is followed.</p>	<p>This option would set requirements concerning the formats that must be used to provide information to customers.</p> <p>The net benefits relate to improved clarity for operators and providers on their requirements when providing information to ensure they do not discriminate against people with disability. This option will also provide assurance that information will continue to be available in a variety of formats to ensure people with disability can access information.</p> <p>The regulatory option provides the greatest opportunity to reduce discrimination against people with disability.</p>
<b>Australian Standards and definitional amendments</b>	This option involves no regulatory or non-regulatory change.	As this reform area proposes updating existing references to Australian Standards in the Transport Standards (so is regulatory in nature), no non-regulatory option is provided.	This option would update 32 references to Australian Standards in the Transport Standards.

Reform Area	Status Quo	Non-Regulatory	Regulatory
Aligning the Australian Standards references in the Transport Standards with current Australian Standards references.	No net benefits are anticipated.		This option would see net benefits as outdated Australian Standards would be replaced, improving clarity for stakeholders, and ensuring references in legislation are not left without a valid technical reference.