



Submission Regarding

**Barriers to the safe use of motorised mobility
devices: discussion paper**

to National Transport Commission

December 2019

Submission to the National Transport Commission regarding “Barriers to the safe use of motorised mobility devices: discussion paper”

Introduction:

RACV’s transformation from operating as a motoring club to an organisation that touches the lives of Victorians in home, mobility and leisure, places us front and centre in the future development of Victoria. Our Corporate Strategy sets the foundations for even greater expansion into these key areas through advocacy, innovation and making membership more meaningful.

With more than 2.2 million members, RACV is a household name in Victoria and a highly trusted organisation. We have long represented our members on motoring and transport issues, advocating on their behalf, and expressing their views to both government and stakeholders.

How Victorians effectively, efficiently and safely move around their state in the future is of vital importance, and RACV is pleased to have the opportunity to provide input to the National Transport Commission on the issues paper “Barriers to the safe use of motorised mobility devices: discussion paper.” RACV has been an active contributor and commentator in the innovative vehicle and mobility device space, producing the document “[Assessment of new recreational transport devices 2016](#)”, “[Mobility beyond driving](#)”, providing safety advice on the RACV website and through the [Years Ahead](#) program as well as providing a response to the National Transport Commission in February of this year on; Barriers to the safe use of innovative vehicles and motorised mobility devices.

Background:

In Victoria, people who do not have access to a car risk falling into a mobility gap and becoming isolated. The personal and social consequences of such mobility-related isolation are severe. People exposed to this risk include seniors who can no longer drive, young people who are not yet able to drive and those in the middle years who do not have a licence or access to a car, especially those on low incomes. People who are temporarily unable to access a private vehicle or drive are also at risk of (temporary) mobility-related isolation. The risk of isolation is reduced or avoided when mobility is supported through alternative mobility strategies. However, these options are weak in some places and not available in others. In addition, alternative mobility strategies take time to learn, and those who have been car dependent can find the task of switching to alternative mobility strategies stressful and slow (Mobility beyond driving - RACV Research Report 2017).

Motorised mobility devices (MMDs) are an alternative method for pedestrian travel for those whose mobility is limited. Many users of these devices are not elderly; approximately 50% are aged 60+ years (Australian Competition and Consumer Commission, NRMA Motoring Services, CHOICE, EnableNSW & Flinders University, 2012). In the context of the aging population and government policy to support older

people living longer at home, use of MMDs is likely to increase (Townsend & Watson, 2013). Ensuring that these devices can be safely used is important, not only for the users themselves, but for other road users with whom they share space.

MMDs are an alternative method of pedestrian travel for those whose mobility is limited. In the context of the aging population and government policy to support older people living longer at home, the use of MMDs is likely to increase (Townsend & Watson, 2013). Ensuring that these devices can be safely used is important, not only for the users themselves, but for other road users with whom they share space.

MMDs offer significant benefits to users in terms of increased independence (ACCC et al., 2012), ability to move around the community, decreased dependence on others for transport and increased confidence and self-esteem (Edwards & McCluskey, 2010). Indeed, mobility is closely linked to quality of life; being able to interact in the community is associated with a higher level of quality of life (Oxley & Whelan, 2008). Balancing the benefits of independent travel offered by MMDs and their safe use should be an important consideration when exploring how safety can be improved.

Motorised Mobility Device Discussion:

Do you agree with aligning the maximum unladen mass with the ATS or is there a more appropriate response to overcome the regulatory barriers identified?

- RACV agrees with aligning the maximum unladen mass with the ATS.
- As this discussion paper itself highlights; *“the evidence which has been supplied to the NTC suggests that the 110kg specified in the ARR is not fit for purpose and is restricting the options available to suit the needs of people with temporary or permanent mobility limitations”*
- RACV's previous background research has identified the need for MMDs to ensure all people can remain engaged and connected within their community. This is appropriately summed up as; *mobility is closely linked to quality of life; being able to interact in the community is associated with a higher level of quality of life (Oxley & Whelan, 2008).*
- Therefore, to reduce the burden and restriction that are placed upon MMDs and their users, RACV agrees with aligning the unladen mass in the Australian Road Rules with ATS.

Do you agree with the proposed pedestrian classification? Is it appropriate that all MMD operators are required to follow the pedestrian road rules?

- This discussion paper again itself highlights there is confusion among how users of MMDs are classified; either a pedestrian or driver (dependent upon the ARR). If regulation acknowledges there is confusion, for consumers this confusion would be amplified. The classification needs to be simplified to easily understand and interpret.

- To this end, RACV supports the proposed pedestrian classification of MMD users. This is on the proviso that regulation is enforced that MMD's do not travel over 10km/h.
- Given that RACV believes and recommends that MMD's should be regulated against speed over 10km/h, RACV believes that they are classified as a pedestrian and therefore, adhere to the pedestrian road rules.
- RACV supports classifying a person/attendant assisting a person in a motorised wheelchair as a pedestrian.

References:

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