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## Document Review Form

Please send your submissions by email to [MMD\\_Consultation@tmr.qld.gov.au](mailto:MMD_Consultation@tmr.qld.gov.au)

**Project No.:** Austroads Project SRL6218: A Nationally Consistent Framework for Motorised Mobility Devices

**Reviewed Document:** Motorised Mobility Devices Discussion Paper

**Author:** Sona Trivedi-Ginn, Queensland Department of Transport and Main Roads

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**Reviewer:** Peter Fraser, Director, Scooters Australia Pty Ltd

#	Section	Comment	Authors response
1	4.1	We do not support the “No action” option as this will continue to allow less scrupulous operators to continue to import or sell sub standard products.	
2	4.2	<p><b>Re: “Cons”,</b></p> <p><b>Point 3:</b> There is an assumption that users are not competent or informed enough to make their own decisions about being informed and making decisions and need “protection” from their own decision making abilities. This is patronising and removes the responsibility and privilege of making informed decisions. It also flies in the face of the advice from the workshop to adopt a comprehensive education campaign.</p> <p><b>Point 4:</b> I assume the ACCC do not agree with this point. It was the ACCC that started this whole exercise in 2009 with a consultation in Canberra, to which we made a submission. We have made numerous submissions to most of the ensuing consultations, to the NSW Say Safe Committee, and various papers in the last 10 years on</p>	

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		the subject of safety, some of which can be found on our website.	
3	4.2	<p>In general terms, we support this Option 2 and are confident that consumers and suppliers are able to be essentially informed and honest, provided those MMDs that do not comply with the standards are still able to be used on public infrastructure, including footpaths. Any future regulation to outlaw non compliant MMDs will severely disadvantage those people who choose a product for their own purposes that does not comply.</p> <p>However, as there are a considerable number of scooters currently on the market that do not conform to the Technical Standards, there will be a large number of consumers and suppliers that will be severely disadvantaged by the current standards. There are many large scooters that are very popular that are over 1500mm in length (any perusal of supplier websites will confirm this), and many that conform to the Blue Label specifications fail to perform adequately (<a href="#">see Central Queensland University report</a>)</p>	
4	4.3	<p>In general we support Option 3 as a second preference, with the reservations expressed in our comments on Option 2 above and on section 5 below, principally in reference to technical specifications.</p> <p><b>Re: “Cons”</b></p> <p><b>Point 1:</b> “It is estimated....” by whom? There is an assumption here that we are not privy to, so cannot comment on the accuracy of this assertion. It is certain that the extra cost will be passed on as the industry is not highly profitable and is very labour intensive.</p>	
5	4.4	<p>We do not support Option 4. Removing the responsibility of the user to make their own decision is counter productive and may have the opposite effect of lulling the user into a false sense of security by not insisting on proper training from the supplier, especially if it is an on-line supplier.</p> <p>However, we are not opposed to mandatory speed limits (of 12 kph), and an unladen weight restriction that takes</p>	

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		into account the varying requirements of battery weights	
6	4.5	See comments on 4.4	
3	5.	<p><b>Technical Specifications.</b> We have consistently supported the UK model for performance and for registration. This is the most economical as it does not require special modifications to the MDDs, as most international standards reflect the UK or less stringent requirements. This particularly effects maximum speed where the UK specification is 12 kph.</p> <p><b>Blue Label:</b> If the CQU testing of blue label compliance is accurate, we do not object to the blue label specifications. However, for some heavy users who rely on a large scooter, they will not be able to use public transport. To be able to use a bus is difficult for most users, but trains and ferries are often used.</p> <p>“Traversing a 75 mm gap”: There is a possibility that a 75mm gap may be too much for some small scooters with 8 inch front tyres. Certainly traversing the gap at speed would likely be possible, but even larger scooters that have stopped in the gap would have problems powering out of the gap. We would suggest a lower threshold at 50 mm if the requirement is from a stationary position. This is particularly so for front wheel drive portables.</p> <p>Most international travellers, whether inbound or outbound, tend to use small portable folding scooters. Provided these are compliant with the specifications we have no objection, although raise the issue of the 75mm gap.</p> <p><b>White Label:</b> As above, there are a considerable number of large scooters that are eminently suitable for footpath use that are longer than 1500 mm, especially those designed for users over 150 kg. We suggest a maximum length of 1600 mm.</p>	
5	6.4	We recommend adoption of the UK model for registration: registration by mail or on-line, at nominal cost, with a registration sticker supplied for the user to attach to the MMD. Number plates are unnecessary. No other	

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		requirement, including medical certificate are necessary. Registration gives the user a sense of legitimacy and legal standing, and allows for easier insurance. It also would provide data for future research. Currently there is no adequate assessment of how many MMDs are sold or operate in Australia. That means that simple issues such as research on MMD safety is not possible.	
6	6.5	We do not support licensing. As we have consistently argued, MMDs are the safest way a person can travel in any form of personalised transport. In our original research we found that is more dangerous to be a pedestrian than a mobility scooter user. However, all suppliers should implement a training scheme and consumers should be educated to demand proper training from a supplier as part of the education strategy outlined in this paper.	
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