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Blindness. Low vision. Opportunity. 

**Vision Australia Submission: Consultation on Drink Riding of Personal Mobility Devices and Bicycles**

Submission to: Department of Transport and Main Roads

Date: 31 January 2024

Submission approved by: Chris Edwards, Director Government Relations and Advocacy, NDIS and Aged Care, Vision Australia

# Introduction

Vision Australia is pleased to have the opportunity to provide a submission to the Department of Transport and Main Roads regarding its consultation paper on Drink Riding of Personal Mobility Devices (PMD) and Bicycles.

This is a short submission which addresses the questions set out in the consultation paper.

# Question 1: Do you support the expansion of RBT to include PMDs and bicycles?

Vision Australia strongly supports the expansion of RBT to include PMDs and bicycles. We believe that the use of RBT for PMDs and bicycles will act as a deterrent to riders in using alcohol prior to or while riding. This will lead to added safety for riders, as well as other road and footpath users with whom these riders interact.

We are also aware of a commercial e-scooter company that has been requiring riders in Victoria to pass a sobriety test before being able to operate an e-scooter during certain hours. This would not cover operators of private e-scooters though, even if it was to be made more widely available.

# Question 2: Do you support RBT of PMDs and bicycles on roads and road-related areas?

Vision Australia strongly supports RBT of PMDs and bicycles in any areas where these transport devices are able to be legally operated.

# Question 3: What BAC limit would you suggest for PMDs and bicycles? (the low range BAC limit for car drivers is under 0.05, the general-range is over 0.05 but under 0.10, the mid-range is over 0.10 but under 0.15 and high range is over 0.15)

Vision Australia defers to the evidence gathered from research regarding the appropriate BAC limit for PMDs and bicycles.

# Question 4: What age of PMD or bicycle rider do you think should be eligible for RBT? (Note that people can get their car learner licence at 16 years old and the legal drinking age is 18 years old)

Vision Australia does not have a particular view on the age of the PMD or bicycle rider that should be eligible for RBT.

# Question 5: Do you support a tiered PIN approach (an on-the-spot fine) that increases based on the level of BAC? Alternatively, should some offences go to Court and if so at what BAC level?

Vision Australia does not have a particular view on the approach to be taken for issuing penalty infringement notices to PMD or bicycle riders who are alcohol impaired.

# Question 6: What do you think is the appropriate PIN amount for a low-range offence for a PMD or bicycle rider?

Vision Australia does not have a particular view on the appropriate amount of the penalty for low range alcohol offences for PMD or bicycle riders.

# Question 7: What are the impacts, if any, on your organisation or the groups you represent if some of these policy changes were made?

Vision Australia has previously outlined its concerns about the safety issues for pedestrians who are blind or have low vision with the increasing prevalence of PMDs, and the ability for these devices to be ridden on footpaths. The issues arise not only because of the potential for serious injury from collision with a fast-moving PMD, but also from the fact that these devices are near-silent, and so there is limited ability to detect their approach and take evasive action. There is no doubt that riders of PMDs and bicycles who are affected by alcohol pose a significantly increased risk to pedestrians who are blind or have low vision because of the impact of alcohol on the capability and behaviours of a rider. It is also likely that insurance arrangements for PMDs would not cover riders who are impacted by alcohol, leading to a poor outcome for any pedestrians who may be struck by an e-scooter in such circumstance.

The suggested policy changes would provide a welcome mechanism for law enforcement officers to deter and reduce the use of PMDs by riders who have consumed alcohol. This approach can only lead to improved safety outcomes for pedestrians who are blind or low vision, as well as pedestrians more generally.

# About Vision Australia

Vision Australia is the largest national provider of services to people who are blind, deafblind, or have low vision in Australia. We are formed through the merger of several of Australia’s most respected and experienced blindness and low vision agencies, celebrating our 150th year of operation in 2017.

Our vision is that people who are blind, deafblind, or have low vision will increasingly be able to choose to participate fully in every facet of community life. To help realise this goal, we provide high-quality services to the community of people who are blind, have low vision, are deafblind or have a print disability, and their families.

Vision Australia service delivery areas include: registered provider of specialist supports for the NDIS and My Aged Care Aids and Equipment, Assistive/Adaptive Technology training and support, Seeing Eye Dogs, National Library Services, Early childhood and education services, and Feelix Library for 0-7 year olds, employment services, production of alternate formats, Vision Australia Radio network, and national partnership with Radio for the Print Handicapped, Spectacles Program for the NSW Government, Advocacy and Engagement. We also work collaboratively with Government, businesses and the community to eliminate the barriers our clients face in making life choices and fully exercising rights as Australian citizens.

Vision Australia has unrivalled knowledge and experience through constant interaction with clients and their families, of whom we provide services to more than 30,000 people each year, and also through the direct involvement of people who are blind or have low vision at all levels of our organisation. Vision Australia is well placed to advise governments, business and the community on challenges faced by people who are blind or have low vision fully participating in community life.

We have a vibrant Client Reference Group, with people who are blind or have low vision representing the voice and needs of clients of our organisation to the board and management.

Vision Australia is also a significant employer of people who are blind or have low vision, with 15% of total staff having vision impairment.