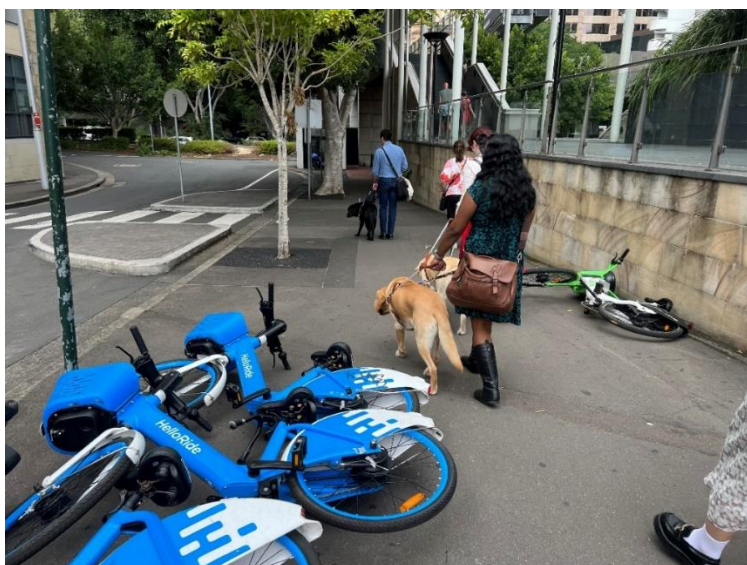


Guide Dogs.

E-micromobility Submission: Impact on people who are blind or have low vision

Written by Dianne Shaddock and Daniel Searle on behalf of Guide Dogs NSW/ACT

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About Guide Dogs NSW/ACT:

Guide Dogs NSW/ACT is the leading provider of specialist orientation and mobility services, supports and training across NSW & ACT. We have expertise in understanding and supporting people who are blind or have low vision to access the community safely and independently and live the life of their choosing.

In addition to providing individual supports, equipment and training, we have a significant access advisory and advocacy focus. Our expert assessments and advice are provided to individuals, businesses and government through participation on panels such as Australian Standards, the

Accessible Transport Advisory Committee (ATAC) with Transport for NSW and numerous other private and public forums.

We have a particular interest in accessible and inclusive design for people who are blind or have low vision, and the implementation of these practices in public places, spaces and services.

About our Clients:

According to Vision 2020, there are approximately 575 000 people with low vision or blindness currently living in Australia with 70% over 65. We have provided services to 3000 people with low vision or blindness over the past year. According to a 2023 survey, more than 3 in 4 Clients reported access barriers in the community. One of the barriers reported is the proliferation of e-scooters and other forms of e-micromobility.

E-micromobility and learnings from other roll out sites:

We have followed the progress of the trial sites in NSW, including considering the parameters that have been put in place by Transport for NSW to increase the safety of riders and the broader community. We appreciate the introduction of rules such as not riding on footpaths and parking scooters upright in such a way not to block the footpath. Despite these rules, we have received feedback from staff and Clients in the trial sites, such as Albury, that shared e-scooters are used on footpaths and they are often dumped or parked in such a way that impedes safe pedestrian travel. This highlights that current education, regulation and strategies to ensure compliance are not adequate to ensure pedestrian safety.

Current NSW trial sites allow for shared e-scooters to travel up to 20km/h. We remain concerned that a collision at this speed will result in significant injury and this presents a serious risk to our clients. In the ACT, where e-micromobility is widespread, a clinical study of Canberra Hospital admissions in 2023 found there were 623 hospital presentations from e-micromobility devices over 15 months, with 17 per cent requiring surgical procedures. While we note that in the ACT, devices are allowed to be ridden on footpaths and are not allowed on the road unless special circumstances allow, we are concerned that this data indicates more needs to be done to protect our community's safety.

We are aware of the vote to ban shared e-scooter providers from operating in Melbourne City Council, including the concern about community safety and the high cost to the health system due to hospital presentation and injury. We feel that NSW should consider this approach, if pedestrian and rider safety is not able to be appropriately managed through education, policies and enforcement.

We hired an e-scooter from Beam in Canberra to understand the education provided to riders prior to use. The following was discovered:

- It was unclear where it was appropriate to park and the impact poorly parked e-scooters and e-bikes had on vulnerable pedestrians. The image on the app seemed to depict the opposite of what was intended – that it was ok to park on the footpath and obstruct pedestrians.
- Language was not encouraging compliance. The word ‘fee’ was used instead of ‘fine’ for non-compliance. When it came to informing the rider about drinking alcohol and scooter use, it was ‘extremely inadvisable’ rather than ‘illegal’.
- There was no reference to needing to use the bell and announce our presence in the vicinity of pedestrians. E-vehicles in general are a big concern for our clients as they are quiet. People who are low vision or blind are often reliant on the e-vehicle user to be cautious and indicate their presence.
- The fee for parking outside of designated parking bays is insignificant and does not encourage use of these spaces.
- The number of dumped scooters in the ACT in places that pose a risk to safety is unacceptable. During rides around Canberra, there were many scooters observed on their side and in places where they obstruct pathways.

What our Clients say:

During a consultation with Clients in the ACT recently about their experience with e-micromobility over the last few years, three key areas of concern were identified by the group:

1. Obstructing the path of travel

Footpath obstructions came up as the number one concern for our Clients. One Client described e-scooters as ‘obstacles and barriers, that seem to be randomly dumped everywhere’. A staff member also reported seeing one of the shared e-scooter company vans unloading and placing charged and ready to use scooters on footpaths for potential users. They were seen placing them in obstructive positions to pedestrians that would impact our clients safety. This is of great concern. Education and enforcement of the contracted providers of e-micromobility devices needs to be considered as a priority.

2. Complaints and compliance

One of the key concerns for our Clients was inadequate complaints and reporting processes. Not only are the current shared e-micromobility devices difficult to identify for our clients, but complaints processes can be inaccessible (due to inaccessible software, apps or alternative communication and correspondence options), they aren’t known to the community and there is a lack of trust because of inaction when they have complained previously. Not only do complaints pathways need to be known, but they need to be followed through and enforcement needs to occur. There needs to be quick action taken by Council and the E-Scooter provider when a report of a footpath obstruction is made, and appropriate action taken against the rider and/or provider where necessary.

3. Rider behaviour and ride zones

Clients have expressed concerns around near-miss collisions with e-scooters on footpaths and e-bikes when crossing roads. A client at our consultation in the ACT said 'I don't want them on the footpath as they always whizz by me quickly and suddenly which scares me'. E-scooters and e-bikes make little to no noise when they approach, which causes some people who are blind or low vision to rely on the rider to indicate their presence or to move around them safely. Whilst current rules require the use of a bell, this has not been used consistently in the experience of those clients that have reported their experiences.

Guide Dogs NSW/ACT recommendations:

Whilst Guide Dogs NSW/ACT looks to support transport options that reduce the reliance on cars and protects the environment through reduction of emissions, we remain concerned about the impact that further roll out and regulation of e-micromobility devices under the current parameters would have on the blind and low vision community. Despite regulation in other similar jurisdictions there continues to be significant problems with compliance and enforcement that puts the safety of the low vision and blind community at risk. We therefore cannot endorse current e-micromobility device roll out without significant improvements. Before further roll out of e-micromobility trial sites, the following areas need to be addressed:

1. Co-design and consultation

People with disability are the experts in their own lives and what impacts their community participation. Consultation at the state level, but also with the local community in potential trial sites, should be set up to guide decision making.

It is noted that the E-micromobility Interagency Group does not have any disability specific agency representation. We would welcome the inclusion of The Office of the Ageing and Disability Commissioner.

2. Education

Education is currently inadequate for riders, shared e-micromobility providers and for the community. A public education campaign, as well as oversight and guidance of education produced for riders of shared E-micromobility devices is necessary.

3. Reporting

Reporting processes need to be clearly communicated and accessible. This includes to our Clients who may use screen readers, require magnification and high contrast, or other preferred formats. Local authorities should take more responsibility when it comes to taking reports of inappropriate e-micromobility use. For example, if the device is posing a risk to the persons safety by impeding an accessible path of travel – a report should be able to be made to local council for action. If rider

behaviour is an issue and a safety concern, the community should be directed to report to local police.

4. Compliance and enforcement

Enforcement of rules is often reliant on both the vigilance of the community and the effectiveness of local authorities. Local authorities and shared e-micromobility providers need to demonstrate to the community that their safety is a priority. They should do this by actively enforcing and communicating their priority towards compliance, both with non-compliant users and shared e-micromobility providers.

5. Ride zones and speed limits

Guide Dogs NSW/ACT does not support e-micromobility devices on footpaths or any other location other than suitably assessed roads, shared paths and bicycle lanes. Speed should be capped at a maximum of 15-20km per hour on the road, 10 km on a bicycle path and 5-10km on shared paths, with a preference for walking speed. If in range of a pedestrian or crossing a road, dismounting or slowing further is recommended. Education campaigns should include a clear focus on ensuring everyone is aware that they are not to be used on the footpath and the impact that failure to do so can have on people with a disability. Clear distinction should be expressed to explain the difference between “shared paths” and “footpaths.”

6. Silence of e-vehicles

Requiring e-micromobility devices to make a recognisable sound while in use should be carefully considered. This would make them much more detectable for people with low vision or blindness.

7. Parking and infrastructure

There should be dedicated parking docks and zones which tie into current transport infrastructure. Parking areas should not impede pedestrian access, should be consistently placed and should be signposted appropriately and be built with accessibility standards in mind.

Purpose built ride zones should be clearly separated from pedestrians via detectable kerbs and be clearly identifiable.

Fines should be increased for leaving scooters outside of these docks and parking zones, including not placing them in an upright position.

8. Accessible pathways

Ensuring a clear and predictable path of travel is essential for people who are blind or have low vision to allow connection to community and participation. Acknowledging that pedestrian travel is the primary purpose of the footpath to ensure accessibility, consistency and predictability is a priority of Guide Dogs NSW/ACT. See our [‘Pathways to Inclusion’](#) document to learn more about how to ensure paths of travel are accessible to people who are blind or have low vision, and for the broader disability community.

Contact us:

It is clear that work needs to be done to protect the safety of people with blindness or low vision if e-micromobility was expanded across NSW. Guide Dogs NSW/ACT would welcome the opportunity to work more closely with government to advise how we can create a community that utilises more active forms of transport, yet prioritises pedestrian safety.

Kind Regards,

Dianne Shaddock (Access and Advocacy Advisor)

Daniel Searle (Community Mobiliser)

Email: socialchange@guidedogs.com.au

Guide Dogs NSW/ACT

ABN 52 000 399 744

nsw.guidedogs.com.au

G03/19 Challis St,
Dickson, ACT, 2606

Email: socialchange@guidedogs.com.au

Phone: 1800 436 364