

D21/1359779

6 May 2022

Australian Human Rights Commission  
[legal@humanrights.gov.au](mailto:legal@humanrights.gov.au)

Dear Australian Human Rights Commission

Thank you for the opportunity to provide feedback on the City of Ryde Council's request for a temporary exemption from the requirements of the Federal *Disability Standards for Accessible Public Transport (DSAPT) 2002* in relation to bus stops.

The Disability Council NSW (the 'Council') is a statutory body that provides independent advice to the Minister for Disability Services on matters that affect people with disability in NSW, as well as their families and carers.

The Disability Council acknowledges that the City of Ryde Council is committed to upgrading all bus stops to ensure compliance with the DSAPT. We support their approach to prioritise bus stops that will most significantly impact and benefit residents with a disability. We also note that they have actively consulted with key stakeholders as part of the disability inclusion action planning process.

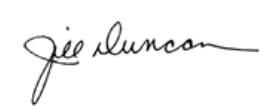
While the Disability Council acknowledges the City of Ryde Council is responsible for in excess of 700 bus stops, and has already upgraded many of these, we are concerned that the final tranche of upgrades will not be completed until 31 October 2025.

We note the Australian Human Rights Commission has the authority to grant a temporary exemption for up to five years (under section 55 of the Disability Discrimination Act 1992 and section 33A.1 of the Transport Standards), however we would strongly encourage the City of Ryde Council be required to comply with the DSAPT within a shorter timeframe.

The *Disability Standards for Accessible Public Transport 2002* are such an important factor in ensuring people with disability can participate in all aspects of community life. While the Disability Council commends the City of Ryde Council on all they are doing to promote inclusion, compliance with the DSAPT must be a priority.

Thank you once again for the opportunity to provide feedback.

Yours sincerely



Dr Jill Duncan  
Deputy Chair, Disability Council NSW

The Disability Council NSW provides independent advice to the NSW Government on policies that advance the equality, inclusion and interest of people with disability  
[www.disabilitycouncil.nsw.gov.au](http://www.disabilitycouncil.nsw.gov.au)