State Development, Infrastructure and Works Committee
Queensland Parliament
sdiwc@parliament.qld.gov.au

5 March 2026

Transport Affordability Amendment Bill 2026 – Motion RE: 28 days' notice of public transport fare increase

Dear State Development, Infrastructure and Works Committee,

Council on the Ageing Queensland as the Seniors Peak and Seniors Social Isolation Prevention Peak, have been advocating for the rights, needs, interests and futures of older Queenslanders since 1957. We work with service providers, community organisations, government and non-government agencies, and connect with older people, their families and support networks to ensure that age-friendly communities are sustained in Queensland. Accessible and affordable transport remains vital to ensuring that older Queenslanders are accessing services and supports, staying connected and ageing well in their communities.

Council on the Ageing Queensland notes, since the introduction of the 50 cent fares, the growth of 21.6% in use of all modes of public transportation (bus, ferry, rail, tram) with commuters saving an average of $2.02 per trip. The cumulative weekly savings for older Queenslanders who rely on public transport and who live on limited or fixed incomes is a mitigative factor in easing cost-of-living stress in daily life. [1]

We write to comment on the stated objectives of the Transport Affordability Amendment Bill 2026, specifically the motion regarding the 28 days' notice of the public transport fare increase. In the instance that this notice is required, there must be adequate and appropriate timeframes given to the planning and implementation of:

1. Consultation with communities impacted by any fare change including online and in person opportunities for feedback and engagement.
2. Targeted communications and awareness raising regarding the consultation period and anticipated outcomes from the consultation in clear and accessible language (digital and hardcopy information). This information would include not only fare changes but also the Transport Affordability Amendment Bill 2026.

We provide considerations below for these areas.

[1] TransLink. (n.d.). *Translink PT performance dashboard. 50 cent fare initiatives – SEQ quarterly growth and savings Q1 2025-26.* [Open data portal]. https://translink.com.au/about-translink/reports-and-publications/performance

In the planning or anticipation of any future fare changes, the 28 days' notice period must be in addition to adequate and appropriate timeframes for planning and implementation of consultation with communities who are connected to TransLink and related public transportation networks inclusive of bus, train, ferry and tram services.
This includes opportunities for communities to provide thoughts and feedback from regions where TransLink services with 50 cent fares operate including Southeast Queensland's integrated TransLink network across Brisbane, Moreton Bay, Logan and Beenleigh, Redlands, Ipswich, Sunshine Coast, and the Gold Coast. This further includes TransLink regional services in areas such as Bowen, Bundaberg, Cairns, Fraser Coast, Gladstone, Gympie, Innisfail, Kilcoy, Mackay, Yeppoon, Rockhampton, Sunshine Coast, Toowoomba and Warwick.[2,3]

Any proposed increase to fare changes will have direct cost-of-living implications and disproportionate impacts on older people including low-income households, people living with disability, people residing in regional communities, and frequent public transport users. This greatly necessitates community consultation on proposed changes and potential impacts to people's daily lives particularly for those cohorts reliant on public transport.

Best-practice public consultation standards indicate that changes to public transport pricing, fees or affordability settings should be subject to appropriate and meaningful consultation. Queensland Government guidance states that consultation should run for at least 28 days, however, where matters are complex, contentious, or have significant community impact, consultation should extend to 60 days or longer.[4]

Practices in other jurisdictions demonstrates that transport fare reviews typically involve multi-stage engagement over several months. For example, the Independent Pricing and Regulatory Tribunal (IPART) in New South Wales undertook a staged review of maximum Opal fares involving an issues paper, draft report, public hearings and a defined public submission window of approximately one month on draft decisions, within a broader process spanning more than a year.[5] Looking to international practices, the New York Metropolitan Transportation Authority (MTA) provided approximately six to seven weeks for public comment and hearings on proposed fare changes in 2025.[6]

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[2] Queensland Rail. (n.d.). *50 cent fares*. https://www.queenslandrail.com.au/inthecommunity/campaigns/50centfare
Stradbroke Bus Service. (n.d.). *Home*. https://www.stradbrokebus.com.au/
TransLink. (n.d.-a). *50 cent fares*. https://translink.com.au/tickets-and-fares/50-cent-fares
TransLink. (n.d.-b). *Our service area*. https://translink.com.au/about-translink/our-service-area

[3] On-demand services in are included in the 50c fares coverage (where operated as TransLink services). North Stradbroke Island is specifically flagged by TransLink as a *Qconnect* initiative that improves connectivity/accessibility on the island. This is described as a seamless ferry -- bus connection for island travel (operator information also describes this linkage). Important exclusions to note - even though 50c fares are across TransLink services some commonly mentioned services that are not included are the Airtrain, Queensland Rail long-distance services, privately operated transport services that may/may not connect to TransLink network services.

[4] Queensland Productivity Commission. (2018). *Guidance note: Best practice consultation*. https://qpc.qld.gov.au/docs/guidance-notes/guidance-note-best-practice-consultation.pdf

[5] Independent Pricing and Regulatory Tribunal. (2024). *Maximum Opal fares until July 2028*.
https://www.ipart.nsw.gov.au/review/transport-public-transport-fares/maximum-opal-fares-until-july-2028

[6] Metropolitan Transportation Authority. (2025). *2025 fare changes – Public hearings and comment*.
https://www.mta.info/transparency/public-hearings/2025-fare-changes

These examples demonstrate that when pricing or service reforms affect broad populations and household budgets, jurisdictions allow multi-week to multi-month consultation processes, often incorporating draft proposals, public hearings and iterative feedback. Consultation periods significantly shorter than 28 days risk limiting accessibility, particularly for groups requiring additional time to obtain information in accessible formats, seek advice, or coordinate community feedback.[7]

In the provision of accessible and clear information, consideration must be given to older people living with disability and changing capacities (physical and cognitive), older people who are carers or who receive care supports in the home, older people from culturally and linguistically diverse backgrounds, and older people who live with lower or limited levels of digital literacy (including barriers to affordability, accessibility and ability with digital information and online engagement). Many older Queenslanders who cannot drive due to e.g., medical reasons (or have chosen to transition to a non-driving lifestyle) use public transportation as their primary mode of transportation. There remain limited affordable options for private or alternative community transport options, and on-demand transport options are not available to all communities. Older Queenslanders in regional areas are particularly impacted by the loss of a licence or having limited access to public transportation.

Any communications regarding fare changes must be multi-channel, plain-language, and available in alternative formats from the outset, rather than on request only. Under the Disability Standards for Accessible Public Transport 2002 *(Cth)* (the Standards),[8] public transport providers are required to ensure that general information about transport services is accessible to all passengers, and where information cannot be provided in a passenger's preferred format, equivalent access must be provided through alternative means. Fare structures, pricing changes, concessions, eligibility criteria and ticketing rules, as core service information, must therefore be communicated in ways that are accessible and understandable to as many people as possible including older Queenslanders and older people living with changing capacities and disability.

The Australian Human Rights Commission's Equivalent Access Guidelines (2020)[9] reinforce that effective communication is central to meaningful consultation, and this requires clear information, ongoing updates, and communication strategies that reach diverse communities.

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[7] Independent Pricing and Regulatory Tribunal. (2024). *Maximum Opal fares until July 2028*. https://www.ipart.nsw.gov.au/review/transport-public-transport-fares/maximum-opal-fares-until-july-2028
Metropolitan Transportation Authority. (2025). *2025 fare changes – Public hearings and comment*. https://www.mta.info/transparency/public-hearings/2025-fare-changes
Toronto Transit Commission. (2023). *5-Year Service and Customer Experience Action Plan and 10-Year Outlook*. https://www.ttc.ca/about-the-ttc/projects-and-plans/5-Year-Service-Plan-and-10-Year-Outlook

[8] Disability Standards for Accessible Public Transport 2002 (Cth) (Austl.). Federal Register of Legislation. https://www.legislation.gov.au/F2005B01059/latest
The Standards also specify minimum requirements for large print (including at least 18-point sans serif font and high contrast), and require equivalent access to public address announcements, meaning that audible announcements must be supported by visual information and vice versa.

[9] Australian Human Rights Commission. (2020). *Guidelines: Equivalent access under the Disability Standards for Accessible Public Transport 2002 (Cth).* https://humanrights.gov.au/__data/assets/file/0017/46313/Ahrc_equivalent_access_guidelines_2020.pdf
Information barriers such as low-contrast screens, lack of visual alerts for audio messages, or overly technical language can undermine equivalent access.

Participants must be kept informed about progress, decisions made, and implementation steps. This means that governments and transport agencies should not only publish accessible materials at the point of announcement, but also provide advance notice, clear explanations of impacts, and follow-up communication in accessible formats.

Queensland transport agencies already demonstrate best practice in accessible communication[10] and collectively they establish a practice where any significant fare changes should be communicated through accessible, plain-language materials, in multiple formats, and supported by options for direct assistance. These practices also align with both the Disability Standards and established Queensland transport accessibility commitments.[11]

Overall, there is a clear obligation that there is online and in person options for consultation with communities impacted by any future fare change. Part of this is provision of targeted communications and awareness regarding consultation period and outcomes from the consultation through information in multiple formats such as large print, accessible digital formats, captioned and Auslan video content, and options for assistance, rather than relying solely on website updates or media releases.

Sincerely
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[10] TransLink publishes its Disability Action Plan in multiple accessible formats including audio, large print, Easy Read and Auslan versions: Transport and Main Roads. (n.d.). *Accessibility and inclusion: Accessibility and Inclusion Strategy and Action Plan (2025–2027) – Moving Together to Connect Queensland.* https://www.tmr.qld.gov.au/accessibilityinclusionstrategy
Similarly, Transport and Main Roads' Accessibility and Inclusion Strategy and Action Plan (2025 - 2027) is available in HTML, Easy Read, Word, captioned audio summaries and Auslan formats: Transport and Main Roads. (n.d.). *Accessibility and inclusion: Accessibility and Inclusion Strategy and Action Plan (2025–2027) – Moving Together to Connect Queensland.* https://www.tmr.qld.gov.au/accessibilityinclusionstrategy
Queensland Rail provides Easy Read materials using simple language and images and commits to delivering information in alternative formats where required: Queensland Rail. (n.d.). *Easy English travel books.* https://www.queenslandrail.com.au/forcustomers/accessibility/easy-english-travel-books
The Queensland Government's digital accessibility guidance also supports the development of Easy Read content using plain English and visual supports: Queensland Government. (n.d.). *Develop Easy Read content.* https://www.forgov.qld.gov.au/service-design-and-delivery/design-public-services/digital-accessibility/develop-easy-read-content

[11] Further example: Queenslanders with Disability Network. (2024). *Queensland Disability Stakeholder Engagement and Co-design Strategy.* https://qdn.org.au/wp-content/uploads/2024/09/QLD-Disability-Stakeholder-Engagement-Co-design-Strategy-2024-v3.pdf