



21 February 2018

Australian Human Rights Commission  
GPO Box 5218  
SYDNEY NSW 2001

Via email: [legal@humanrights.gov.au](mailto:legal@humanrights.gov.au),  
CC: [REDACTED].

To whom it may concern,

**RE: Birchgrove Wharf - Transport for NSW request for temporary exemption pursuant to section 55(1) of the Disability Discrimination Act 1992 (Cth) ('DDA') and section 33A.1 of the Disability Standards for Accessible Public Transport (Cth) ('DSAPT')**

Guide Dogs NSW/Act is the leading and largest provider of orientation and mobility services to people who are blind or vision impaired in NSW.

Encompassed within our broad range of services, Guide Dogs NSW/ACT has significant access advisory advocacy experience and regularly delivers expert advice, individually and through forums such as the Accessible Transport Advisory Committee (ATAC) to private and public institutions.

The primary goal of this advocacy and advice is to work with all levels of Government, providers and the broader community to ensure safe and equitable access for people who are blind or vision impaired to all modes of public transport and their associated infrastructure.

We are aware of the application for Temporary Exemption – Birchgrove Wharf ('the application') submitted by Transport for NSW and consultations which have occurred with ATAC and the Inner West Council.

Whilst Guide Dogs NSW/ACT acknowledges the substantial topographical challenges as outlined in the application faced by Transport for NSW and the Inner West Council in achieving necessary access standards for Birchgrove Wharf, these impediments do not negate the rights of people with disability to be provided with a safe, independent and accessible path both to, from and onto an accessible ferry, at the same level of amenity and dignity of use afforded to other users without a disability.

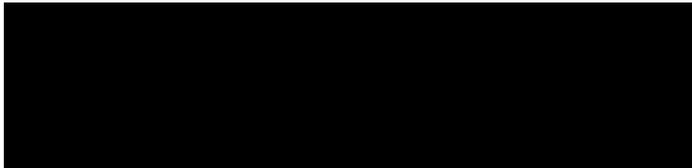
We are concerned that there appears to be no indication of either Inner West Council or Transport for NSW's genuine intent to reconsider and address the ongoing inaccessibility of Birchgrove Wharf.

Further infrastructure investment at this location without consideration of future access requirements will further entrench the inaccessibility of the site and make future attempts to redress this inaccessibility even more unlikely.

Despite the clear challenges facing both Inner West Council and Transport for NSW to upgrade Birchgrove Wharf, with consideration to the Whole of Journey Guidelines and the DSAPT requirements, Guide Dogs NSW/ACT strongly encourages both parties to continue their dialogue with a view to achieving a suitable solution.

Should Guide Dogs NSW/ACT be able to assist with further consideration or provide additional advice on access requirements for people who are blind or vision impaired, please don't hesitate to contact Jennifer Moon, Community Education & Access Advisor, Guide Dogs NSW/ACT at [REDACTED].

Yours sincerely,

A large black rectangular redaction box covering the signature area.

**Mr Dale Cleaver**  
CEO  
Guide Dogs NSW/ACT