



Dear Madam/Sir,

Submission of the draft AER Retail Guiltiness

Guide Dogs Queensland welcomes the opportunity to make a submission to the AER on the draft Retail Guidelines published 5 June 2026. This submission is to provide feedback on the proposed changes of the draft Retail Guidelines, focusing on Part 3, *Make communication easy to understand*.

Feedback on Retail Guidelines Part 3: clause 10 and 11.

Guide Dogs Queensland welcomes the addition of accessibility requirements in the retail guidelines, however, cautions on their scope, implementation, and enforcement.

The requirement of technical accessibility standards being met offer customers with additional accessibility requirements a more equitable, dignifying, and productive communication experience.

We recommended that the specific technical accessibility requirements used be the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.1 Level A. These guidelines have been recognised and implemented internationally. These have been incorporated in legislation by the European Union, and have been used as a benchmark for numerous nations anti-discrimination laws. They have also been used during legal proceedings in Australia as a minimum standard in *Maguire v SOCOG 2000*.

While these standards are robust, and inclusive of various differing accessibility requirements, we caution against utilising the WCAG 2.1 as a whole. Several elements, particular colour contrast requirements will create excessive retailer difficulty regarding brand colours and copyright.

Due to this, we recommend they be included as a whole in principle and as an example of best practise. Only elements related to text size and font, assistive technology compatibilities, and document design should be enforceable. Enforceability should also be restricted to the areas within the scope of the Retail Guidelines.

While the WCAG 2.1 standards have been updated to version 2.2, we recommend the use of the 2.1 version. This allows for the possibility of future scaling towards their yet to be released 2.3 version, and opens up a new angle of retailer competition. A sufficient timeframe should be considered to allow retailers to gradually update and create new templates, and test accessibility prior to customer use. This will also allow for potential costs to be more easily absorbed by the retailer over a longer timeframe.

With regard to the application of and testing metrics for these technical accessibility standards, WCAG 2.1 has numerous testing tools readily available, from a.i to human testing checklists. The use of the WCAG 2.1 allows for a distinct benchmark that can be assessed and also allows for fair and natural investigations into potential guidelines breaches.

Guide Dogs.



In conclusion, accessibility is a fundamental need for many energy customers. While there may be hesitation in the industry regarding the scope, implementation, and enforcement of technical accessibility standards; this may stem from the industries current accessibility knowledge and practises. A well-defined, long term approach to ensuring customers are able to engage with, and be communicated to will future proof the industry. This will prevent sudden shocks of potential disability discrimination legislation revisions, and shield against the growing attitudinal demand for accessibility by customers, the general public, and legal and political institutions.

We look forward to seeing this consideration incorporated into the Retail Guidelines.