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Submission: Re:

1.4 Gold Opal card arrangements.

I consider that the relegation of Seniors Card holders who are not Pensioner Concession Card holders and NSW War Widow/er Card holders to the Concession Opal Card might severely disadvantage individuals who have limited income.

Hence sensible means testing should be instituted. i.e. get rid the arbitrary 20 hours per week criteria and base the means testing on actual income. Many over 60 year old people have limited means and, for these individuals who at best might get a few casual shifts, the higher cap could be quite burdensome.

Therefore, whether they are on Newstart or lowly paid, if their income falls below the current annual \$17,843.80 Newstart allowance (+ working credit), these over 60 year olds should still maintain the same entitlement as Pensioner Concession Card holders and NSW War Widow/er Card holders. A lowly paid over 60 year old will be struggling to pay rent and bills on such low income and will most probably not have the advantage of living rent free in the parents home.