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Submission: The proposed increase in the cost of the OPAL Card for Seniors Card holders who are not pensioners or NSW war widow(er)s amounts to a 360% increase on the current cost of \$2.50 per day compared to the recommended increase of 44% for the Gold Opal Card for pensioners and NSW war widow(er)s. While the proposed increase for the gold Opal Card may be justified as being broadly in line with CPI increases over recent years, the increase proposed for Seniors Card holders is not justified by the argument for means testing of access to the Gold Opal Card because eligibility for the Seniors Card bears no relation to personal means.

No analysis has been provided to show that the proposed increase for Seniors Card holders will produce the desired revenue increase, rather than discouraging the use of public transport and increasing use of private vehicles.