

The Research Director
Infrastructure, Planning and Natural Resources Committee
Parliament House
George Street
BRISBANE QLD 4000

Submission No. 249
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By email to: IPNRC@parliament.qld.gov.au

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Submission to Transport Legislation (Taxi Services) Amendment Bill 2015 inquiry

I am an operator of a fleet of 28 taxis, as well as having driven taxis myself for 15 years. I also operate a motor mechanics and panel shop to service the needs of my own and others' taxis, employing three mechanics and panel beaters.

I urge the committee to pass this Bill to ensure that commercial transport drivers and operators can be made to comply with current laws. It is clear that current enforcement measures are not effective, and that ride-share companies and drivers will not comply without the measures contained in this Bill.

I also call on the Queensland Government to fast-track the review of the industry to ensure a level playing field, a sustainable and inclusive service to all sectors of society, and the highest levels of service and safety for the public.

In addition to being in agreement with the points already raised in submissions published to date (Nos. 1-8), I wish to share the following issues related to taxi operation in support of the need to pass this Bill:

1. Driver protection insurance. This is not compulsory, but during audits Queensland Transport checks whether operators have this insurance. Most taxi bases provide insurance for drivers in case of an accident or other injuries while working, in the form of income protection and death and permanent disability cover. There is usually only 3 days' excess on these policies, so drivers receive a reasonable income while they are unable to work. This is in effect a form of Workers' Compensation for taxi drivers, even though they are not employees of operators or taxi-booking companies. This is something that I consider Queensland Transport should make compulsory. Do Uber and other ride-sharing companies have this level of protection or support for their drivers?
2. Additionally, part of each taxi's compulsory \$20 million public liability insurance is so-called "gap insurance", which covers the passenger between the street and beginning or end of the taxi transfer.
3. In addition to providing specialised service with wheelchair-accessible vehicles, taxis provide a valuable public service in transporting children with disabilities to and from educational facilities on a daily basis. Every day of the school year, these children are transported from home to educational facility and back. This is often carried out by the same driver each day, and treated with a level of care and concern that goes way beyond a commercial transaction. The model used by ride-sharing companies wouldn't allow them to provide this kind of service with commitment and consistency at its heart.
4. A large number of taxi drivers have been in the industry for a long time. Many have chosen to be professional drivers, not treating driving as a hobby or a get-rich-quick scheme. A large number are mature-

age divers, with considerable life experience, and a commitment to treating every customer and society with care and respect.

5. Taxi companies must check that drivers are allowed to work and where not permanent residents, do not violate the conditions of their visas by working excess hours per week (for example, overseas students permitted 20 hours per week). This helps to maintain a fair workforce for Australian permanent residents.
6. In addition to mandated checks of criminal history and currency of driver licences, taxi operators must check that each driver's Driver's Authorisation is current on a weekly basis. This is carried out by operators, not taxi booking companies, another example of regulatory burden on individual operators, often small business people. While this is an impost, operators are keen to carry out these checks to ensure that anyone who is not authorized to drive a taxi is not behind the wheel of a taxi, a potential deadly situation.
7. Taxis are marked with clearly identifiable taxi livery and hail lights, individual taxi numbers, and the phone number of the taxi booking company (inside and out). This means the behaviour of taxis and drivers is much more visible to the community, making it easy for third parties, such as other road users and pedestrians to identify a taxi transgressor and bring this to the attention of either taxi booking companies, Queensland Transport or the police. Unlike ride-sharing companies, taxi-booking companies investigate complaints about drivers and make a note on drivers' driving history.
8. As taxis are unmistakable, it's easy for Random Breath Testing to know that a taxi driver's Blood Alcohol Content (BAC) must be 0%. Ride-sharing drivers' cars are in no way identifiable, so a driver would only be held to a 0.5% BAC by police, as they would be unlikely to identify themselves as a ride-sharing driver unprompted.
9. The taxi licensing scheme limits the number of taxis allowed in the market. This is determined by Queensland Transport, based on waiting time data collected through taxi booking companies. Queensland Transport can issue more taxi licences if the waiting time threshold is exceeded. The combination of a known fleet size, and taxi fares determined by Queensland Transport, ensures that taxi drivers and operators are able to make a living in providing this service, particularly given the high costs of operating taxis. For ride-sharing companies on the other hand, there is no limit on the number of drivers or cars on the road, so there is no guarantee a driver could make a decent living if they wish to ride-share companies cars as a professional driver. In the long term, driving Ride-sharing companies' cars won't necessarily be available to choose as a profession.
10. Australians enjoy hard-won protections of fair and safe working conditions.
11. There is a requirement for taxi drivers to complete a checklist of vehicle safety points before every shift, to ensure the vehicle is in safe driving condition. These checklists are enforced by Queensland Transport. Do ride-sharing companies enforce per-shift safety checks above those a normal private driver would carry out?
12. Fatigue management is an integral part of ensuring the safety of taxi services, and this is monitored and enforced by the use of taxi computers, which do not allow drivers to log on if they breach the requirement of having had a sufficient break, or logs them off if they have reached their maximum driving time in a set period. This is also enforced by Queensland Transport compliance officers. Can Ride-sharing companies demonstrate the same commitment to taxi driver and public safety?

Once again I urge you to pass this Bill in the interests of Queensland.

Ertan Yasar