

21 October 2015

Research Director  
Infrastructure, Planning and Natural Resources Committee  
Parliament House  
George Street  
Brisbane Qld 4000

Dear Sir/Madam,

Thank you for the opportunity to respond to the private member's Bill, the Transport Legislation (Taxi Services) Amendment Bill 2015.

RACQ is the independent advocate for Queensland motorists with 1.2 million members across the State. RACQ's advocacy charter incorporates three priorities which include safety, affordability and sustainable mobility. Our response to this proposed amendment is based upon our understanding of our current and future members' needs and priorities gained through our engagement with them on motoring and other mobility issues.

We explored a range of ridesharing issues in an online survey of 1,009 adults, representative of the Queensland demographic profile, in June 2015. Our policy position, including our views put forward in this submission, is informed by the expressed views from this survey.

RACQ is opposed to the legislative amendments for two reasons. Firstly, a road safety management tool such as demerit points should not be used by regulators as a commercial penalty. Secondly, RACQ believes ridesharing as a disruptive influence in the point to point transport system should be considered in a holistic review of the taxi regulations, as recently announced by the Queensland Government.

The purpose of our demerit point system is to make our roads safer by encouraging motorists to drive responsibly. The current list of demerit offenses is included in Schedule 3 of the *Transport Operations (Road Use Management—Driver Licensing) Regulation 2010*. The list only includes road safety related offenses.

The proposal to allocate demerit points for drivers who are not violating road rules would be anomalous and would undermine the demerit system as a road safety initiative. It would also create inconsistencies across state and territory borders. It is not appropriate to use this system to prevent rideshare drivers conducting their business.

The Australian Capital Territory Government has announced that ridesharing will be legal from 30 October 2015. A number of State governments are also conducting reviews of their legislation affecting ridesharing. These processes will result in a legal role for ridesharing in at least parts of Australia as a component of the point-to-point transport system. If the proposed Queensland legislation is passed, then Queenslanders could be disqualified from driving for offences that are unrelated to road safety and are legal in other states and territories. At the same time, drivers with licenses from other jurisdictions where ridesharing is legal, would not lose demerit points if they are



prosecuted for that offence in Queensland. This anomaly would undermine the road safety national offences system and make future national standardisation of road rules more difficult.

While RACQ does not support this proposed amendment, it supports the Queensland Government reviewing the *Transport Operations (Passenger Transport) Act 1994*, to consider whether ridesharing and other future transport options can improve the mobility of Queenslanders. When asked whether they felt people should have a choice of taxis or ridesharing services, 80% of our survey respondents agreed they should have a choice and 80% agreed that government should set rules to ensure ridesharing is safe.

RACQ's position on ridesharing is consistent with the views of the majority of the Queensland public. RACQ has three key objectives of legislative reform on point-to-point transport. These are:

Objective 1: RACQ supports reforms that meet the needs of our members and improve the range of options in point-to-point public transport, including for vulnerable groups such as people with disabilities and the frail aged. This reform should allow flexible, innovative and responsive transport models to emerge, rather than protecting entrenched business models.

Objective 2: Regulatory reform of point-to-point transport services should provide a safety framework that incorporates vehicle safety, driver safety and passenger safety. This would incorporate driver licence and criminal history checks as well as safe driver training and vehicle inspections for taxis, limousines and rideshare providers.

Objective 3: Regulation should support industry reform and improve service delivery, while minimising regulatory and capital cost burdens that would increase the price structure of point-to-point services, including rideshare, taxis and limousines. In particular the high government and licencing cost burdens on the taxi industry need to be reviewed. Specific licences, Compulsory Third Party insurance and motor insurance classes for ridesharing services may also need to be considered.

Should you require further information about the RACQ position on ridesharing and on this regulatory reform, please contact me or Michael Roth, Executive Manager, Public Policy [REDACTED]

  
Yours sincerely,

[REDACTED]  
Paul Turner  
Executive General Manager Advocacy  
RACQ