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The Research Director
Legal Affairs and Community Safety Committee
Parliament House
Brisbane QLD 4000

Dear Sir / Madam

RE: TACKLING ALCOHOL-FUELLED VIOLENCE LEGISLATION AMENDMENT BILL 2015

Thank you for the opportunity to submit comments in relation to the Legal Affairs and Community Safety Committee's ("the Committee") consideration of the *Tackling Alcohol-fuelled Violence Legislation Amendment Bill 2015*.

Taxi Council Queensland ("TCQ") is the peak body for the Queensland Taxi Industry, representing more than 16,000 industry participants that deliver more than 100 million passenger trips per annum.

As you may be aware, TCQ provides secure rank services for the Queensland Government through a Funding Agreement ("the agreement"). The agreement sets out a number of ranks that are to be staffed at specified times in late night precincts. As part of the agreement, TCQ gathers extensive data regarding the numbers of patrons using the ranks and conducts video surveys on a periodic basis to corroborate and confirm the data collected. Should the Committee wish to review some of this data, TCQ will be more than happy to supply it on request.

TCQ has been involved extensively with liquor reforms since the introduction of the Drink Safe Precincts in 2010 by the Bligh Government. Further, extensive data was supplied for the development of the Newman Government's Safe Night Out Policy. Unfortunately, TCQ was excluded from the implementation panel of that policy and has had limited opportunity to contribute to discussions regarding the current proposed reforms since.

The Queensland Taxi Industry plays a unique role in the late night economy because where other measures can only minimise or reduce risk associated with alcohol consumption, taxis can remove the risk altogether. This makes taxis a key element of any policy that deals with liquor licencing.

One of the critical things for consideration when looking at lockout times is the capacity of transport systems to effectively move people out of the precinct. At the times that are being suggested, that is 1.00 am lockout in a 3.00 am trading precinct, or 2.00 am in other areas granted late night trading there is often little or no public transport – this is especially the case in regional Queensland. Any measures that would see significant numbers of patrons on the streets at the same time will severely challenge the ability of the Queensland Taxi Industry to service all of them in a timely manner.

Unlike other industries where the front line of service delivery is provided by employees, each taxi driver is a small business in their own right. This means that they cannot be compelled to service any particular precinct meaning that each individual may choose to simply avoid areas where there are perceived problems. Over the last several years, TCQ and the industry have worked very closely with licensees and the Queensland Police Service ("QPS") to improve ranks and locations in late night entertainment precincts to encourage more drivers to service demand. This is done through effective rank management, assessing customers so as to not expose the driver to potential harm and working with bodies such as Chaplain Watch to provide assistance to extremely intoxicated persons.

It would be a fair assessment that more taxis than ever now service late night entertainment precincts because of the effectiveness of such measures. While servicing these areas may be lucrative on any given night, for some drivers the perceived risks far outweigh any potential reward. It must be noted however that this is less to do with the opening hours and more to do with being able to manage demand. In fact, removing arbitrary licensing restrictions would likely be of benefit, with people self-selecting their departure times and demand being steady over a number of hours rather than having all patrons on the street at the same time. Arguably the current regime of licensing already delivers the desired outcomes with Deputy Director General Ford noting in his testimony on 2 December 2015:

“...while it is possible in Queensland now to trade till 5 am there are really relatively few venues that do...Even within those venues that are licensed to trade for extended hours, many of them do not trade to the full extended hours.”

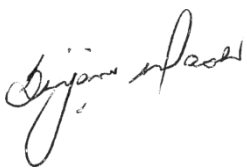
The flow-on effect of mandatory closing times is that it becomes difficult to service demand due to the restricted number of ranks and additional congestion from other vehicles in the precinct seeking to pick up and drop off. Instances like this are often seen at major events that are poorly serviced by public transport, leaving taxis as the only effective means of travelling away from the venue/precinct. Invariably this is seen as a failing of the Queensland Taxi Industry when it is in fact a failing of other policy measures, usually mass transit. This is perhaps the single greatest concern that TCQ has with respect to the suggested reforms – that an artificially created increase in demand at closing times will be seen as ineffective peak demand management by the taxi industry. To that end, failure to consider all of the implications of these reforms, especially with respect to transport, may be seen as setting the Queensland Taxi Industry up to fail.

While the current placement of ranks is adequate and secure ranks operate at maximum efficiency with the average waiting time being less than one (1) minute and no more than 15 minutes at peak times, more can be done. For example, there are often loading zones outside of venues and these could convert to taxi zones at specified times of night. If more of these could be established, nearer the exits of major venues, then this may act as an incentive to drivers to service the area without the prospect of having to queue for up to 15 minutes. Further, the incidence of violence is likely to reduce even further if people can walk to a rank only metres from where they leave the last venue. TCQ is happy to work with venues to assist with directions to the nearest rank and the Queensland Government to establish additional secure ranks that have proven so successful in managing crowds and their interface with taxis.

As noted earlier, the late night economy may be lucrative for some participants in the Queensland Taxi Industry however it must be balanced against the safety and security of drivers and customers. TCQ is willing to work closely with the Queensland Government and other stakeholders to ensure that whatever policy is ultimately adopted it is practical and workable.

Should you have any further enquiries, please do not hesitate to contact me on [REDACTED].

Yours faithfully



Benjamin Wash CPA
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Taxi Council Queensland