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Research Director  
Transportation and Utilities Committee  
Parliament House  
George Street  
Brisbane Qld 4000

## Submission

### Transport and Other Legislation (Personalised Transport Reform) Amendment Bill 2017

Cairns Taxis Limited (CTL) appreciates the opportunity to make this submission in relation to the Transport and Other Legislation (Personalised Transport Reform) Amendment Bill 2017.

While the explanatory notes state that strengthening safety standards are an important objective, CTL submits that the proposed legislation considerably weakens existing standards and poses increased risk to passengers and drivers. CTL is also strongly of the view that the proposed legislation does not provide a practical framework for delivering on the stated accountability objective. CTL submits the following for consideration:

#### **Safety of Customers and Drivers**

*Security Cameras:* It is inconceivable that the proposed legislation does not make it mandatory for security cameras to be installed in all vehicles being used for providing personalized transport services for a fee. There can be no doubt that failure to do so will lower safety standards for both passengers and drivers. Cameras have undoubtedly proven to be effective in preventing crime and detecting offenders and there is no justification for the argument that such a safety measure is not needed when cash is not carried in vehicles.

*GPS Monitoring:* In the interests of both customer and driver safety, all personalized transport vehicles should be equipped with GPS monitoring facilities completely independent of driver mobile telephones. Failure to do so creates considerably greater risk in the event that the driver telephone is deactivated by switching off or disposal.

*Driver Emergencies:* In the interests of driver safety, it should be mandatory for drivers to have an ability to be able to declare an emergency and to facilitate assistance. Driver safety would be compromised and again, downgraded, without some form of covert alarm activation capability coupled with independent GPS monitoring.

*Fatigue Management:* There is nothing in the proposed legislation that would stop a driver from switching between platforms on the same day. This makes it totally impossible for booking organisations to discharge their fatigue management responsibilities. Some facility is suggested whereby “hours on the road” by personalized transport drivers are independently monitored and readily accessible by booking organisations.

### **Accountability and Compliance**

*Independent Personalised Transport Authority:* Particularly given the difficulties experienced by the Department of Transport and Main Roads (TMR) in enforcing previous legislation and regulations, it would be far preferable for policy determination, compliance activities and associated administration functions to be completely separated from TMR.

*Drivers Authorisation:* Prior to being issued with a Drivers Authorisation, evidence should be produced that the applicant has an ABN and is GST registered. Adequate controls are needed to ensure that the Authorisation is withdrawn in appropriate circumstances and that a current data base is readily accessible by all booking organisations.

*Vehicle Identification:* To assist with correct registration, insurance and compliance activities, all vehicles engaged in personalized transport should be capable of identification via a unique series of number plates, in addition to highly visible signage.

*Public Liability Insurance:* It should be a condition of registration renewal that a vehicle owner requesting registration for personalized transport use presents a “Public Liability Certificate of Currency”.

Yours faithfully

A black rectangular box redacting the signature of R Roberts.

R Roberts  
General Manager