

Limousine
Association
Queensland

Representing the Limousine Industry
Since 1971

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SUBMISSION from LIMOUSINE ASSOCIATION QUEENSLAND

Transport and other Legislation (Personalised Transport Reform) Amendment Bill 2017

Thank you for giving the Limousine Association Queensland the opportunity to have input to the new Amendment Bill 2017.

The Minister's release on the 9th March 2017 detailing the new stage 2 changes from the original outlined on the 11 August 2016 was welcomed by the LAQ however we wish to put the following points to you.

Queensland has been serviced by Limousines from the late 1960's and the Limousine Association Queensland (LAQ) was formed in 1971. Since that time the LAQ has been the peak body representing the owners, operators and drivers within the industry when negotiating changes that enhance the Safety and wellbeing of the travelling public as well as those of operators and drivers.

During this time many changes have been negotiated and changed to ensure the industry has kept pace with the challenging environment.

The QPTH released on the 11th August 2016 had the intention of decimating the limousine industry as we know it. This was planned by extinguishing the need for both a Limousine Licence and a designated registration plate from limousines and allowing all and sundry to operate as a ride sharing/ booking entity.

The LAQ saw this as a total degradation of the Industry which had served the Queensland travelling public with a safe and distinct mode of transport for decades.

As an Association we harnessed the tenacity of our members and non-members collectively to lobby all Queensland politicians on the merits to retain the efficiently functioning Limousine industry in Queensland. In particular we persuaded the politicians not to follow the errors of other States and Territory jurisdictions.

The outcomes the LAQ achieved were echoed by our clients and the Limousine industry stakeholders whose over whelming desire was that Limousines should continue in its present form to provide safe and reliable service to their clients.

Since August 2016 the LAQ Board had numerous meetings with Government Ministers, Local Members of Parliament and TMR stating our case to preserve the Limousine industry as a stand-alone section of the QPTH.

One main reason to retain the Limousine industry was that Limousine Licences are perpetual licences owned by small business people and Investors who have galvinised their asset to underpin and supplement their retirement. The action to extinguish a perpetual limousine licence is contrary to legislative procedures adopted by other State jurisdictions.

The release of the amended stage 2 which is to be phased in during the second half of 2017 has recognised that there are three different classes of service provided. Namely, Taxi Service Licences, Limousine Service Licences and Booked Hire service licences.

For this paper the LAQ will only discuss what affects the Limousine Industry and what we would like to see implemented to ensure the Safety and excellent service provided by Limousines is maintained. The privileges as outlined by the Minister included the retention of

1. Limousine Licences
2. Limousine registration plates (easy identification)
3. The right to use Priority lanes or areas, bus and transit lanes.
4. Existing exemptions under the liquor Act 1992 that enables the serving of alcohol. and,
5. The right to advertise themselves as Limousines.

The Minister also stated that there will be some changes to Regulatory framework.

This will be necessary as some sections of the TOPTR had amendments removing the sections stating that only Limousines can advertise as providing "Limousine services", e.g. Regulation s106.

This regulation was removed and replaced with s141a which has to be amended as operator accreditation will no longer be required and it only refers to s70 which relates to Taxis.

Since 5th September 2016 some operators removed their "L" registration plate, handed back the Limousine service licence and started to operate as a "ride share" but still continued to use the privileges afforded to Limousines with regard to access to many locations, e.g. Airports and Sporting stadiums. When these Ride Share operators were questioned by Traffic controllers at these locations they insisted they were Limousines operating under the QPTH release on 11th August 2016. This is in contravention to the new rules set by Government.

Under the current regulation Limousines are a distinct class of public passenger service. We strongly agree that under the new Legislation this distinct class should and must be retained so as to stop any confusion in the eyes of our customers or the general public as to who is performing which tasks.

The LAQ recommendations would be that Limousines be Licenced, operate in a luxury appointed vehicle that has a minimum wheel base 2800mm or above as per the current legislation.

This does not prevent any ride booking vehicle to operate as a luxury vehicle but by having the mandatory minimum of 2800 mm wheelbase, no vehicle under 2800 mm can be registered, licenced and operated as a limousine.

This also ties in with the Ministers statements in the Stage 2 release that limousine and Limousine licences would be retained.

The retention of Special Purpose Licences for a period of up to three years is welcomed by the LAQ as it gives the Government and TMR time to assess the impact of all the changes and the effect it will have on the Limousine industry as a whole.

Section 69 will need more information as it implies that this may be carried out by any driver of any vehicle and not just Taxis.

If this is correct it could mean that it is in fact legalising touting.

New section 71 would imply that the stretched Limousines over 12 seats may be licenced as limousines. If they are not then they would come under Charter Buses which is a completely different category.

The LAQ proposes that all stretched vehicles that wish to operate as a Limousine be categorised in the registration "purpose of use" as a "Limousine" and not Mini Bus or Chartered Bus.

With the new proposal of making all Limousine Licences "Whole of Queensland", the LAQ is concerned that if there is a downturn in a particular area then Licences may be sold and /or migrated to areas that are performing better. This has already occurred in the past when there was a downturn in Far North Queensland (FNQ) and Licences migrated to South East Queensland and when the market picked up in FNQ there was a shortage of Limousine Licences. This was overcome by the re-introduction of Regional Licences after consultation with Queensland Transport and the Limousine Association.

In conclusion, the Limousine Association Queensland welcomes the new stage 2 reforms and requests that points raised here be given careful consideration and that future legislation be specific and ensure that the distinct classes , Taxi, Limousine and Booked hire (Ride Booking) are segregated without blurring and legislated in their own right. The LAQ and it's members do not wish to see legislation and regulations where the general public are unsure about the catergorisations of transport mediums.

It's imperative that our customer base are cognisant of the three distinct forms of transport conveyance. You are either a Taxi with a "T" designated licence plate, a Limousine with a "L" designated licence plate or a Booked hire (Ride Booking) vehicle with a designated licence plate, rather than the proposed branding postioned on both front and rear windscreens. This form of identification will ensure that the public will be able to identify the three different forms of transportation. Equally as important, licenced plates will enable TMR compliance officers to utilise licence plate software recognition to identify unregistered vehicles or vehicles committing offences.

Yours Sincerely,

Frank Bonomo
President
Limousine Association Queensland Inc

