Research Director
Transportation and Utilities Committee
Parliament House
George Street
BRISBANE QLD 4000

Dear Sir/Madam

## RE: SUBMISSION TO THE TRANSPORT AND OTHER LEGISLATION (PERSONALISED TRANSPORT REFORM) AMENDMENT BILL 2017

Supreme Taxi Co would like to tender the following submission to the Parliamentary Committee investigating the *Transport and Other Legislation (Personalised Transport Reform) Amendment Bill 2017* and *Transport and Other Legislation (Personalised Transport Reform) Amendment Regulation 2017* tabled in the Queensland Parliament on 21 March 2017 for consideration. As a significant player in North Queensland, this company welcomes the opportunity to provide a response on the future of personalised transport services.

The taxi industry while sharing many characteristics with other modes of public transport is however distinctly different. Taxis have been the *only* universal passenger transport service that has operated at *no cost to the taxpayer*. Instead 16 000 small business owners – 'Mum and Dad investors' provided enormous, private fiscal investment in Queensland's taxi industry. This in turn contributed significant revenue to the government in the form of taxi licence and registration fees, stamp duties, GST, driver registration fees and charges. It has supported a plethora of allied industries providing direct and indirect employment for thousands of Queenslanders. The industry is now unstable and the investment described above virtually worthless.

Recommendation 1 – The Queensland Government must offer to purchase all taxi licences and offer a lease-back scheme to operators across the state.

Supreme Taxi Co does not support the legislation as tabled. It is our contention that the proposed bills provide further complexity and a lack of clarity to Queensland's passenger transport space.

Queensland's taxi industry has seen significant financial investment by everyday people. These investments have seen recent instability as a direct result of government failure to uphold its own laws and de-regulation by stealth.

- Supreme Taxi Co therefore proposes the Queensland Government offer a buy-back scheme to **ALL** taxi licence owners in Queensland.
- Purchase prices should reflect the sale price of taxi licences specific to geographic locations prior to
  the entry of illegal taxi services in Queensland (ie the first half of 2014), which saw state governments
  of both persuasions unwilling and unable to upload their own laws.
- The Queensland Government should then lease taxi licences to operators across the state allowing market forces in each geographic area to determine lease rates and the number of persons willing to provide taxi-type services.
- This proposal will provide ongoing government revenue that will efficiently repay the government's initial buy-back figure and then deliver a positive income stream.
- The market and potential income fluctuations will determine lease figures and thus establish a sustainable number of cars and operators in each location.
- Queensland taxi licence investors whose property rights have been trampled by inadequate compensation measures and flawed efforts to provide a 'level playing field' will have their investment justly compensated.
- Vulnerable persons (the elderly, infirm, disadvantaged, disabled) will continue to have access to reliable public transport 24/7 under this arrangement. Regional areas with limited public transport options will have the certainty of passenger transport services.

# Recommendation 2 – Require ALL market participants (taxis, rideshare, other personalised transport providers) to lease licences on an annual basis from the government.

In the same vein as the proposal above, all providers of passenger transport services (taxis, rideshare, other providers) should also pay the government a yearly lease figure in order to operate. This will provide ongoing government revenue and pose a cost saving for the taxpayer. Currently, government and others provide vehicles, insurance, registration and associated running costs for services that could be subsumed in a more cost effective way.

A lease-back arrangement would also allow market forces to determine the supply of personalised transport services across all licence categories. All operators in the point-to-point transport space must be able to generate and maintain a *viable* business. Regardless of who is permitted to provide taxi-like services, there is a limit to the amount of work and therefore income available.

An attractive aspect of this proposal is the opportunity for co-regulation between transport providers and the government. Rather than developing and implementing a new and potentially convoluted set of regulations and regulatory bodies, this framework will streamline the requirements and provide the much sought after level-playing field. In addition, the public can be assured that a stringent process is applied equitably across all providers with rogue operators weeded out in the early stages of a tender process or as a result of poor adherence to requirements.

#### Recommendation 3 – Reform and streamline the Driver's Authority (DA) application process.

The current Driver's Authority (DA) process needs reform. Across the state, all operators are struggling with a chronic driver shortage. Despite Townsville undergoing a rise in unemployment, it is extremely difficult to recruit and retain drivers. While passengers rightly demand well-trained drivers, the process for an individual to become a driver is expensive and unnecessarily complex.

Proposals to improve this for operators, drivers and passengers includes:

- Reduce or subsidise the costs for drivers wishing to enter the industry. Many DA applicants have been unemployed or made redundant and the cost to fulfil the initial regulatory requirement is prohibitive.
- Enhance the efficiency of processing an application for a DA. Potential drivers should be able to submit an application and receive their DA within moments, especially if they have completed all requirements as specified.
- Government subsidisation of DAs in all centres will assist in driver recruitment. This is especially important for ensuring that sufficient drivers are available for wheelchair accessible vehicles.

## Recommendation 4 – Ensure due processes and procedural justice practices are enacted with respect to drivers

Currently some Taxi Booking Companies (TBC) and providers exercise unfettered authority and remove drivers from their system without following any type of due process or procedural justice. Drivers, as the face of the industry must be afforded some basic rights. It is inappropriate for drivers to be punitively excluded from a dispatch system based on hearsay or without negotiation or a fair exploration of events. They must have the opportunity to provide their perspective in relation to alleged breaches.

# Recommendation 5 - Require all market participants to install minimum standard security cameras and fixed GPS tracking for consumer and driver protection.

Installation of security cameras and fixed GPS tracking in vehicles is an important safety and security requirement. Not only does this provide a safety net for passengers, it is a protection for drivers against assault, theft and allegations of inappropriate conduct. Undoubtedly these are expensive requirements,

however if minimum standards are required, then all members of the travelling public and drivers are afforded this degree of safety. This is of particular concern to females or for those travelling in isolated or suburban areas late at night or in the early hours of a morning.

Recommendation 6 - Incorporate the use of go-Card payment facilities in all passenger transport services.

The incorporation of goCard facilities in all taxi-type providers across the state will integrate passenger transport providers within the existing public transport infrastructure and provide a cashless payment point for consumers. Whilst this will provide more benefit for operators in South-East Queensland, travellers to other regions and centres can use their goCard regardless of their geographic location.

#### **Final Comments**

Any regulatory reform of Queensland's personalised transport industry should be based on evidence and balance the needs of the whole community and the entire state. There can be no doubt that innovation is a critical component of any modern business. Supreme Taxi Co believes that undoubtedly the paradigm of passenger transport in Queensland is undergoing unprecedented change. However, these transformations should build on the successes, insights and lessons of the point-to-point transport space to build a more agile and responsive industry. This is an opportune time for government to re-establish a sustainable taxi industry and align passenger transport services across the entire state therefore injecting some much-needed stability.

Supreme Taxi Co would like to thank the *Parliamentary Committee* for the opportunity to submit this paper and provide feedback on the future of passenger transport services in Queensland.

Regards

Les Gist

Chief Executive Officer Supreme Taxi Co

10 April 2017