



IPART Independent
Pricing and Regulatory
Tribunal | NSW

Maximum Opal fares until July 2028

What we heard: Stakeholder
feedback to our Issues Paper

Information Paper

August 2024

Transport >>

Acknowledgment of Country

IPART acknowledges the Traditional Custodians of the lands where we work and live. We pay respect to Elders both past and present.

We recognise the unique cultural and spiritual relationship and celebrate the contributions of First Nations peoples.

Tribunal Members

The Tribunal members for this review are:

Carmel Donnelly PSM, Chair
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Sharon Henrick

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Invitation for submissions

IPART invites comment on this document and encourages all interested parties to provide submissions addressing the matters discussed.

Submissions are due by Monday, 16 September 2024

We prefer to receive them electronically via our [online submission form](#).

You can also send comments by mail to:

[Click here and type name of review/investigation.]

Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop, Sydney NSW 1240

If you require assistance to make a submission (for example, if you would like to make a verbal submission) please contact one of the staff members listed above.

Late submissions may not be accepted at the discretion of the Tribunal. Our normal practice is to make submissions publicly available on our [website](#) as soon as possible after the closing date for submissions. If you wish to view copies of submissions but do not have access to the website, you can make alternative arrangements by telephoning one of the staff members listed above.

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If you would like further information on making a submission, IPART's [submission policy](#) is available on our website.

The Independent Pricing and Regulatory Tribunal

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1 What stakeholders told us about Opal fares

The Minister for Transport has asked us to review fares for Opal services until June 2028.

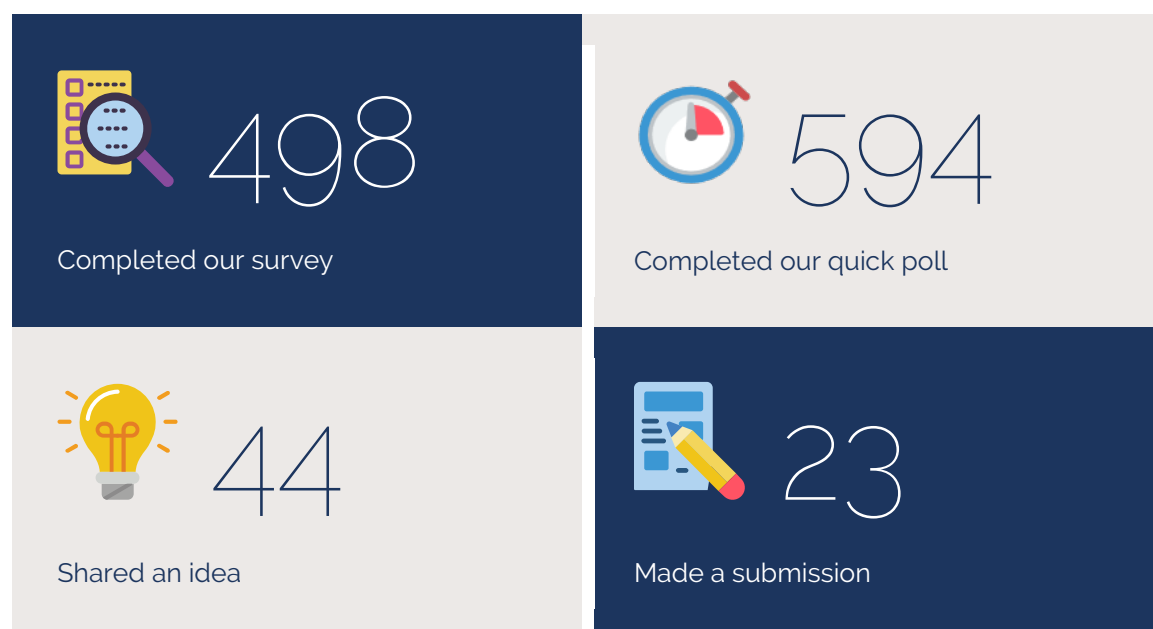
In January 2024, we published an Issues Paper explaining some key issues for setting maximum Opal fares. We included questions to stakeholders on how we should approach this review.

Over a six week consultation period, we received feedback on our Issues Paper through our website, and the NSW Have Your Say website. People could share their feedback through any of four methods:

- a survey
- a quick poll
- a 'Share your ideas' tool where stakeholders could leave suggestions and 'upvote' suggestions from other stakeholders
- written submissions.

This information paper presents the feedback that we heard during our consultation period. This chapter presents a summary of our consultation methods, responses, the key issues raised by stakeholders across the consultation methods. Chapters 2 and 3 presents more detailed findings of each of our consultation methods as well as some of our analysis of the feedback results.

We heard from frequent and non-frequent users of public transport, from organisations and other interested stakeholders.



The feedback that we have received from stakeholders to our Issues Paper and the insights gathered through our survey, quick poll and the ideas shared by stakeholders have informed our approach to preparing our draft maximum Opal fares to 2028.

We considered this feedback to inform the analysis and draft decisions set out in our [Draft Report](#) and [Draft Determination](#). We also obtained cost and Opal journey information from Transport for NSW as well as data from the ABS and other sources to complete the analysis of the objectives and mandatory considerations before making our draft determination and recommendations. Stakeholders will have another opportunity to provide further feedback on our Draft Report and Draft Determination in submissions and at our Public Hearing.

1.1 Key issues raised by stakeholders

Across all forms of engagement stakeholders raised a wide range of issues. These included:

Figure 1.1 Key issues for stakeholders



1.1.1 Affordability

In our survey, we asked respondents what would encourage them to use public transport more often. 'More affordable fares' was the second highest rank choice for both low frequency users and high frequency users of public transport.

3% of high frequency users did not know the cost of fares and 24% had a rough idea. In comparison, 6% of low frequency users did not know the cost and 14.5% had a rough idea of the cost.

Submissions also asked us to consider the affordability of current fare prices. Concerns about cost of living weighed heavily into some stakeholder views of affordability. Examples of stakeholder comments included:



"I am tired of a system that does not consider heavy public transport users who may not be eligible for the concession card but who still struggle to pay for transport if they do not have a regular income."¹



"Please don't increase fares during a cost of living crisis! It may just well be the straw that breaks the citizens' backs. The very citizens who are struggling to make ends meet during these trying times and have to rely on the affordability of public transport."²



"As cost of living expenses continue to increase it is reassuring to know Opal Gold Card charges remain capped at \$2.50 a day. Peace of mind is a very important stabilising influence in an uncertain economic climate."³

To read more about how we considered affordability throughout this review, you can read our [Information Paper - Affordability](#).

1.1.2 Fare options

We asked respondents to our survey which features of Opal fares and payments are most important to them. The three most popular options for high frequency users were:

1. Daily travel caps.
2. Weekly travel caps.
3. Opal transfer discount.

Among low frequency users the most popular options were:

1. Daily travel caps.
2. Lower concession or Gold Senior/Pensioner fares.
3. Off-peak discounts.

Submissions also provided suggestions about different fare options that could be implemented, some of these ideas included:



"The Friday travel cap does not help users like me. It was far more useful to have the half price trips after 8 journeys. I would recommend if the system is based on caps, the daily cap should be \$10, on Monday to Thursday, and the Friday to Sunday cap \$5."⁴

"...the following changes to Opal fares are recommended:

1. Reduce the differential between fares applying to ferries and other modes in order to reduce anomalous overpricing of short distance ferry journeys, which lead to underutilisation of ferry capacity



2. In view of the large number of leisure ferry passengers, no off-peak fares should be offered for ferry passengers. It may also be desirable to exclude ferries from the daily cap discounts that apply on Friday, Saturday and Sunday.

3. Where a passenger transfers between modes, they should only pay the fare applicable to the mode with the highest fare level."⁵



"I would like to request the removal of the 3.21km distance which is automatically added when someone enters the CBD. This puts my fare into a higher category than it would otherwise be if purely the distance from the starting to end station was calculated."⁶

Stakeholders suggested a number of ideas for fare options in submissions and in responses to our Have Your Say consultation. These included:

- Keep the weekly \$50 cap.⁷
- Shorten peak hours (including consistent with Pre-pandemic hours or create staggered options).⁸
- \$5 daily cap.⁹
- Bring back \$2.50 Sunday travel cap.¹⁰
- Half price on Friday, Saturday, Sunday and public holidays instead of current 30% discount.¹¹
- Discounts for late services.¹²
- Free travel once a month.¹³
- Monday - Thursday daily cap of \$10, Friday - Sunday daily cap of \$5.¹⁴
- \$2.50 travel cap for passengers under 25 years old.¹⁵
- Allow yearly caps along with daily and monthly caps.¹⁶
- Make concession fares cheaper.¹⁷
- Free public transport for all.¹⁸

- Free travel within certain areas such as the CBD.¹⁹
- All family travel, 2 adults and 2 children pay, all other kids travel free.²⁰
- Increase fare free travel for children up to the age of 5.²¹
- Expand access to concession fares / Make fares more affordable for those ineligible for concession.²²
- \$2.50 daily cap for Gold Card only to apply in metropolitan area - per km charge to apply for areas outside up to a new limit of between \$3 and \$5.²³

To read more about how we considered fare options throughout this review, you can read our [Information Paper - Fare package options](#).

1.1.3 Service quality and reliability

Among high frequency users more reliable services was ranked the third most important factor to encourage more public transport use, while higher quality services was the fifth most important.

We also received a number of submissions that asked us to consider the service quality and reliability when setting maximum Opal fares. One stakeholder commented:



“Opal fares need to be in line with the reliability of services of our trains, trams and bus schedules. Often the buses and trains are never on time and are also dirty/smelly which really deters passengers travelling on the transport network. The quality of buses and trains that we have do not justify the current charges of Opal.”²⁴

To read more about how we considered the impact of service quality and reliability, you can read our [Information Paper - Financial and operational performance](#).

1.1.4 Environmental sustainability

In our survey we asked frequent users of public transport to rank the importance of reasons for choosing public transport out of six options. Choosing a more environmentally sustainable form of transport was the fourth ranked reason.

Some submissions also asked us to consider the environmental benefits of increased public transport patronage compared to alternatives such as private motor vehicles.²⁵

Stakeholder comments about environmental sustainability of public transport included:



“We should be encouraging more people to take public transport to reduce our Carbon Footprint, with this potential increase, I can hardly see that being an encouraging factor.”²⁶



"all metropolitan public transport should be free to encourage communities to get off the road and stop polluting our atmosphere".²⁷



We are living with the impacts of catastrophic climate change; there is ample evidence that private motor vehicles are environmentally unsustainable ... there is ample urban planning evidence that you can't have an effectively functioning city with private motor vehicles but rather there is a need for effective public transport in an effectively functioning city.²⁸

To read more about how we considered environmental sustainability throughout this review, you can read our [Technical Paper – Modelling socially optimal fares](#).

1.1.5 Fare evasion

Some stakeholders also raised the issue of fare evasion across the Opal network. Passenger compliance is managed by Transport for NSW and the NSW Government. However, this is an important issue for some stakeholders.

Some comments we received in submissions about fare evasion included:



"Many people not paying for fares and getting away with ""free"" travel because they don't feel the need to pay for unreliable services".²⁹



"Too many people jump on the bus not even attempting to pay fare and this must surely impact the profitability of some bus routes and...the actual numbers of people using the bus routes. Make people pay".³⁰



"Fare evaders are prevalent on buses, trains and ferries. Unless Transport NSW are sincere and employ more staff on these public transport facilities, all metropolitan public transport should be free to encourage communities to get off the road...".³¹

To read more about the impact of fare evasion, you can read our [Information Paper - Financial and operational performance](#).

1.1.6 Seniors/Retirees

Submissions also encouraged us to consider the benefits of the Gold Opal card, and the circumstances relevant to Seniors and retirees eligible for the Gold Opal card. Some comments we received in submissions included:



"IPART should recommend ...that there be no change to both the existing \$2.50 daily maximum fare for the Gold seniors/pensioner Opal card users and to the qualifying criteria to receive this."³²



Encouraging old people to be out and about, thus keeping them fit and engaged in society is surely better than other expensive initiatives for them. Public transport is already there and operating, that makes the \$2.50 a bonus revenue rather than a fare. The gold opal card was a brilliant idea in every respect,³³



"don't increase fares for pensioners."³⁴

However, support for Gold Opal card discounts was not universal. One submission stated:

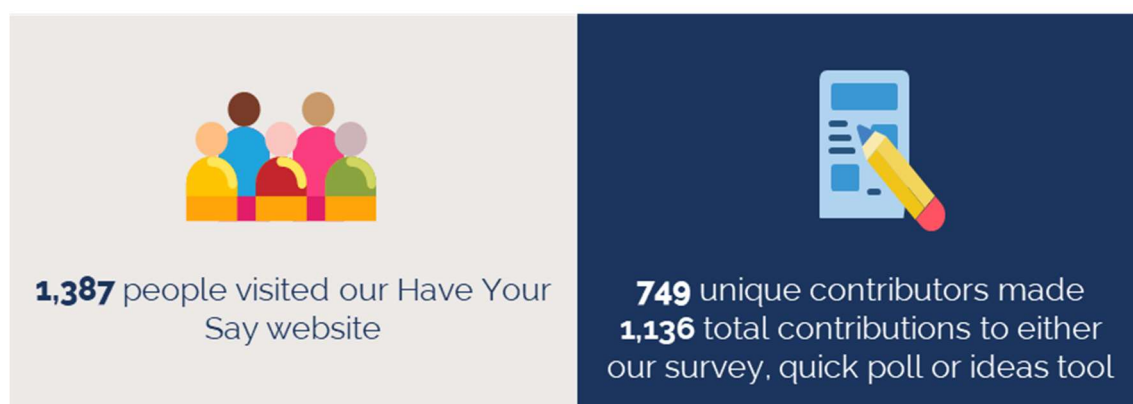


"the Senior's Opal card metropolitan maximum fare of \$2.50 should not extend beyond Hornsby/Berowra (or similar), Waterfall, Campbeltown etc. I am a holder of one, and do not see why we should have to be subsidised by regular fare payers ... There could be a mileage factor in deciding new fare limits of \$3 to \$5 (maximum), and still be superb value..."³⁵

To read more about how we considered the impact of fares on seniors/pensioners, you can read our [Information Paper - Affordability](#).

2 What we heard from our Have your Say consultation

Maximum Opal fares affect people who use the Opal network and NSW taxpayers, who pay for the majority of public transport costs through subsidies. Because of these impacts, we considered that it was important for our consultation to be as broad as possible. We used the Have Your Say website to make it easier for interested stakeholders to contribute to our review and to broaden our engagement with the community.



2.1 We heard from stakeholders through our public survey

2.1.1 What we asked in our survey

We structured the questions of our survey to better understand how stakeholders use public transport, what aspects of public transport are important to them and what would encourage them to use public transport more often.

We asked respondents whether they were a frequent user (defined by at least 1 weekly or fortnightly trip by public transport) and divided respondents based on whether they were a frequent or infrequent user. This allowed us to analyse how the preferences of passengers differ based on frequency of use.

We asked both groups of participants similar questions. These questions focused on:

- Planning travel: how often participants travel, how aware they are of cost, reason for travel and how they access trip information.
- Preferences: what would encourage more public transport, what features of the current system are important.
- Flexibility: would participants shift travel to cheaper off-peak times, why or why not.

We wanted to understand the most significant factors that influence individuals deciding to use public transport. Factors included affordability, convenience (i.e. how easy it is to travel), how quick travel is compared to other modes, a lack of alternatives and environmental conscientiousness.

2.1.2 Who responded to our survey

We asked the participants of our survey demographic questions to help understand who was providing us the feedback.

We note that the self-selecting nature of the survey means that the responses cannot be relied on as statistically representative of the views of the community. To understand who was providing us feedback and how they compare to the community that lives within the Opal network, we compared the demographics of respondents with those of the population that live within the Opal network (using ABS data) and Opal card data.

The demographic differences between the respondents to our survey and the wider community are summarised in Table 2.1. Despite the differences the responses still provide good insights about issues relevant to the Opal network, understanding and views of Opal users and community members.

Table 2.1 Differences between our survey respondents and the community

Category	Our survey	The community	Difference
What type of Opal card holder are you?	71% of respondents to our survey travelled on an Adult Opal card or used contactless payments	75% of passengers in the Opal network use an Adult Opal card or use contactless payments	Adult passengers make up a higher proportion of the commuting population than was represented in our survey.
What is your current employment status?	75% of respondents to our survey were employed	We estimate that 55% of people in the Opal network are employed	Respondents to our survey tend to have higher rates of employment than is representative of the community
What is your total annual income (before tax)?	The median income for respondents to our survey was between \$75,000 to \$99,000	In 2020 the median income in Greater Sydney was \$55,600. If we assume 2% average increase the median income in 2024 would be \$60,954	Respondents to our survey tend to have a higher income than is representative of the community.

Note: We estimated the population of the Opal network by combining ABS population figures for Greater Sydney, Newcastle and Lake Macquarie, Hunter Valley, and Illawarra. We estimated the labour force of the Opal network by multiplying the proportion of the NSW population in Newcastle and Lake Macquarie, Hunter Valley, and Illawarra by the labour force in NSW (excluding Sydney). We then took this figure and added the labour force in Sydney to estimate the labour force of the Opal network.
 Source: Transport for NSW, [Opal Trips – All Modes](#), accessed February 2024, ABS, [Region Summary: Greater Sydney](#), accessed February 2024.

We also asked stakeholders about their postcode to better understand how public transport preferences differ with location. Table 2.2 lists the postcodes that responded the most to our survey.

Table 2.2 Top 5 postcodes that responded to our survey

Area	Postcode	Percent of responses
Located on the Central Coast and includes East and North Gosford	2250	2.4%
Located in the upper North Shore of Sydney and includes Hornsby	2077	2.0%
Located in the inner suburbs of Sydney and includes Leichardt and Lilyfield	2040	2.0%
Located in the inner suburbs of Sydney and includes Surry Hills and Darlinghurst	2010	2.0%
Located in northern suburbs of Sydney includes St Leonards and Crows Nest	2065	1.8%

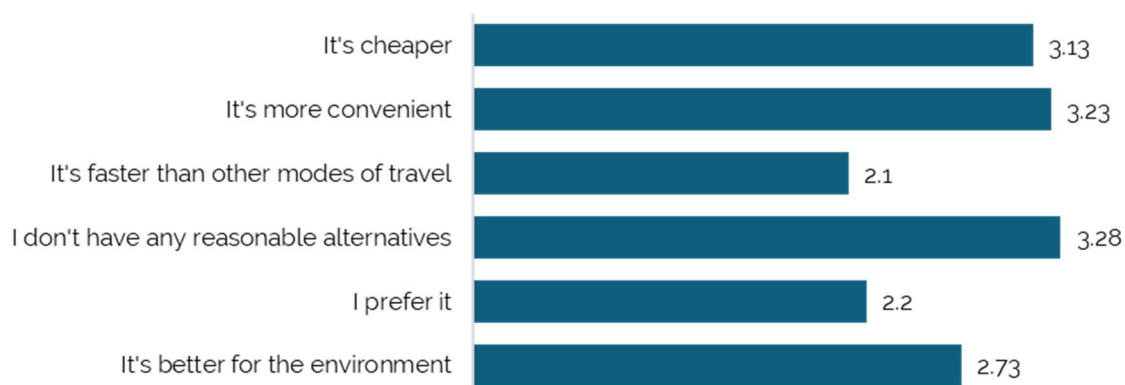
2.1.3 What we heard in our survey

We gathered detailed feedback in the responses we received to our survey. Stakeholders told us about how often they use public transport, why they choose to use public transport, why they travel at specific times and the features of public transport and the Opal system that they value.

One of the key areas we wanted to understand was why people choose or don't choose to use public transport. This provides some understanding of which aspects of public transport (price, convenience, quality, etc.) are most important, and which will encourage more people to use public transport in the future.

High frequency users of public transport indicated that, convenience, the lack of reasonable alternatives and the relative price of fares are the most important reasons for currently using public transport over alternative modes. The price of fares is an important factor when passengers decide to use public transport, but that there are several other key factors that also impact decisions to travel on public transport.

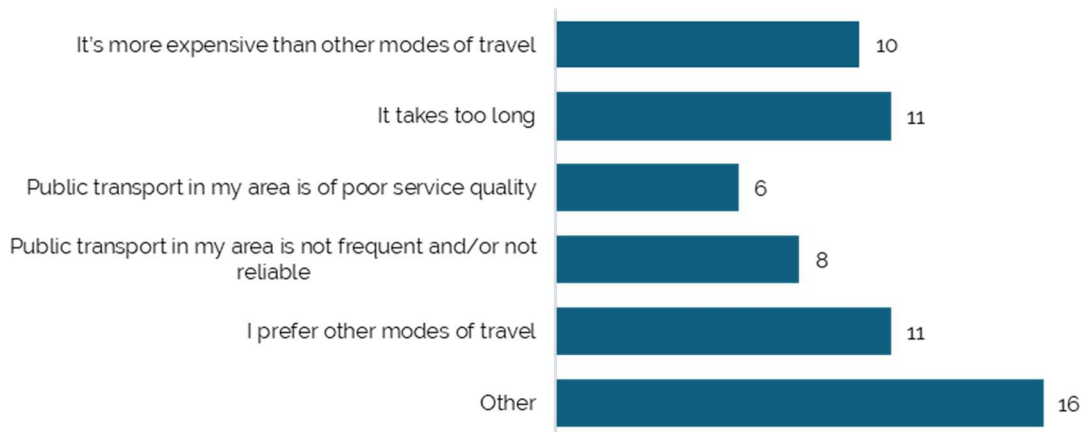
Figure 2.1 What is the main reason for choosing public transport over alternative modes? (High frequency users – ranked responses)



Note: 371 stakeholders responded to this question. The higher the score the higher the option was ranked in response to this question.

Low frequency public transport users commonly reported that they didn't use public transport more often because they preferred other modes of travel and that travel on public transport takes too long¹.

Figure 2.2 Why don't you use public transport more regularly? (Low frequency users; Number of responses)



Note: 62 people responded to this question.

- That it is difficult to use public transport as a wheelchair user.
- Several stakeholders said they use public transport when they travel to Sydney, but that is not very often.
- That they mainly work from home, so only use it when travelling to the office.
- That when travelling with a family including children it is often cheaper to drive.
- That they walk to work instead of taking public transport.
- That they are retired now and drive for local trips instead of trips to Sydney for work like they did before retirement.

We also asked stakeholders what type of fare options would improve their experience with public transport. Some of the stakeholder views and suggestions we received were:

- Integrated pricing based on distance, regardless of mode or transfer. No extra cost for transferring between modes.
- Making the cost of using public transport cheaper relative to driving.
- Lowering ferry prices.
- Cheaper peak prices because commuters shouldn't be penalised trying to get to and from work.
- Compensation for delays.

¹ Excluding the 'Other' option.

- Weekly, monthly or annual passes or subscriptions. These should provide a discount over the regular price.
- New discounts to reflect that many commuters work some days from home and often no longer spend enough to meet the weekly caps.
- Fare options don't matter, more direct services are more important.
- Peak and off-peak prices should also consider the journeys end time as well as the start time and the location of the journey.
- Peak fares should be different if someone is travelling away from high traffic areas as these services are often a lot less busy.
- Return to previous peak and off-peak hours.
- Free travel for children, due to the cost and also the inconvenience of organising Opal cards for children.
- Bring back the Family Funday discount for Sunday travel.
- Peak fares should scale based on how close the travel is to the busiest time in the peak period.
- Link Opal cards for members of the same family and provide discounts based on the total amount of travel among the linked cards.
- Bring back half priced after 8 trips in the week.
- More accurate fares based on exact distance or time travelled instead of distance bands.
- Zone passes that allow unlimited travel within a certain zone.

Survey responses based on demographics

We examined how preferences differed among groups of survey respondents.

The first group we considered were how views of Adult Opal card holders differed by total annual income. Adult Opal card users are the majority of users on the public transport network. We wanted to explore the differences between this passenger group based on total annual income and to see how preferences align with income.

The second group we examined was based on employment status. Employment status provides some proxy for the purpose of travel and to a lesser extent the time of travel (full time employees probably have less travel flexibility for trips like commuting). We wanted to explore the differences in this group and how preferences align with level of employment.

The results of this analysis, presented in Table 2.3 show that regardless of employment status or income level most respondents felt strongest about 3 factors, affordability, reliability and frequency. The only group that had a different factor was retired stakeholders who also favoured more direct services.

Table 2.3 What would encourage you to use public transport for more of your travelling?

Demographic	Most important factor	Second most important factor	Third most important factor
Adult Opal card – \$49,999 income and under	More affordable fares (27 responses)	More reliable services (27 responses)	More frequent services (26 responses)
Adult Opal card – \$50,000 to \$99,999 income	More affordable fares (81 responses)	More reliable services (71 responses)	More frequent services (69 responses)
Adult Opal card – \$100,000 income and above	More frequent services (102 responses)	More affordable fares (100 responses)	More reliable services (91 responses)
Employed full time	More affordable fares (197 responses)	More frequent services (189 responses)	More reliable services (180 responses)
Employed casual or part time	More frequent services (59 responses)	More reliable services (58 responses)	More affordable fares (54 responses)
Not currently employed	More affordable fares (18 responses)	More reliable services (18 responses)	More frequent services (17 responses)
Retired	More reliable services (21 responses)	More frequent services (21 responses)	More direct services (20 responses)

We found that between respondent groups there are different preferences for features of Opal fares (Table 2.4). All groups had a preference for daily caps and most groups had a preference for weekly caps. Other features such as the Opal transfer discount and Opal trip advantage were also popular features. Stakeholders who were retired ranked concession and Gold Opal benefits highly.

Table 2.4 Which features of Opal fares and payments are most important to you when you use public transport (select all that apply)?

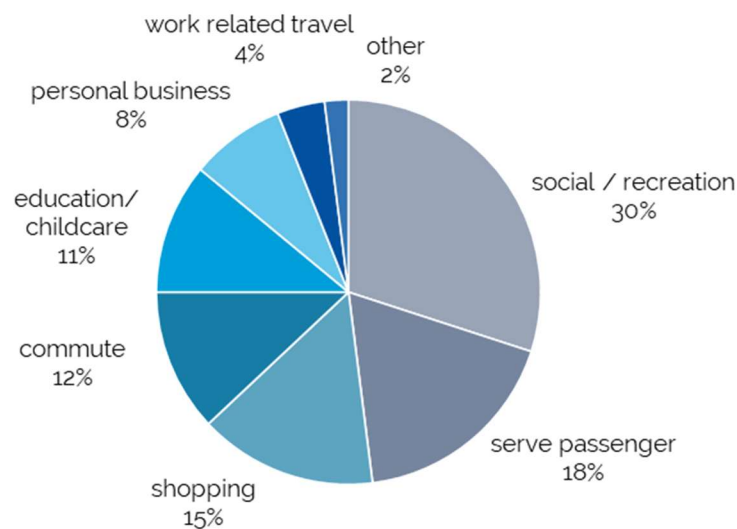
Demographic	Most important factor	Second most important factor	Third most important factor
Adult Opal card – \$49,999 income and under	Daily travel caps (27 responses)	Weekly travel caps (26 responses)	Opal transfer discount (23 responses)
Adult Opal card – \$50,000 to \$99,999 income	Daily travel caps (64 responses)	Weekly travel caps (63 responses)	Opal transfer discount (46 responses) Opal trip advantage (46 responses)
Adult Opal card – \$100,000 income and above	Opal transfer discount (75 responses)	Daily travel caps (72 responses)	Paying with contactless payment (66 responses)
Employed full time	Daily travel caps (156 responses)	Weekly travel caps (152 responses)	Opal transfer discount (135 responses)
Employed casual or part time	Daily travel caps (54 responses)	Weekly travel caps (50 responses)	Opal transfer discount (41 responses)
Not currently employed	Daily travel caps (15 responses)	Opal transfer discount (14 responses)	Distance fare bands (12 responses) Off-peak discounts (12 responses)
Retired	Lower concession or Gold Seniors/Pensioners fares (40 responses)	Daily travel caps (19 responses)	Opal transfer discount (10 responses) Opal trip advantage (10 responses)

2.2 We heard from stakeholders through our Quick Poll

We asked stakeholders to complete a Quick Poll with a single question. We asked stakeholders 'What's your main purpose of using public transport?'. We asked this question because we do not have existing data that identifies why someone took a trip on public transport. We wanted to understand why people are using public transport and compare this to existing data about why people travel using any mode of transport.

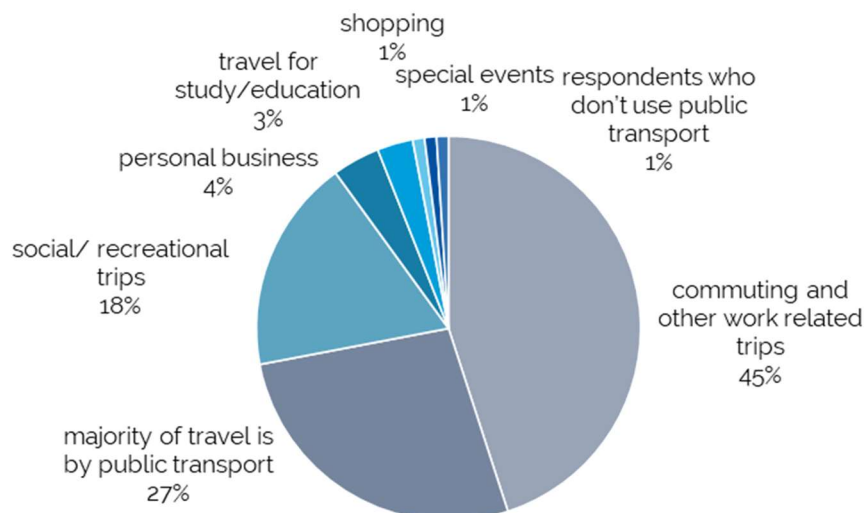
The Household Travel survey identifies the main reason for travel (all modes). The most common reasons to travel in 2022/23 are in Figure 2.3.³⁶

Figure 2.3 Most common reasons to travel in 2022-23



The respondents to our Quick poll told us the most common reason that they use public transport. This is shown in Figure 2.4².

Figure 2.4 Quick poll most common reasons to travel



² It should be noted that the NSW Household Travel Survey is a representative and robust survey of NSW residents while our Quick Poll is not.

The categories for purpose of travel are slightly different to reflect the different nature of public transport travel compared to all modes of travel. Public transport only makes up 8% of all travel that was measured in the Household Travel Survey for 2022/23.³⁷

2.3 We heard the ideas and suggestions of stakeholders

Our Survey and Quick poll were designed to ask stakeholders about their preferences for public transport. We recognised that this might limit the feedback of some stakeholders who have wider views about public transport. While submissions were available for all responses to our issues paper, we also used an 'Ideas Tool' to allow stakeholders to provide suggestions for and about their experience on public transport.

The feedback received through the Ideas Tool was made public so stakeholders would be able to 'upvote' comments that they agreed with.

We received 44 ideas from stakeholders.³⁸ The three most upvoted comments were:

- "Bring back the Funday Sunday. The daily caps fare \$8 (adult) for travel on Friday is not useful for family as we all working and studying." – 5 votes.
- "Revert back the pre-COVID peak travel times. Shorten peak hours. Bring back 8 trips then free travel for the week" – 5 votes.
- "Weekly travel cap discounts for regular commuters. 8 trip discount. Sunday fundays with 2.50 cap like before" – 4 votes.

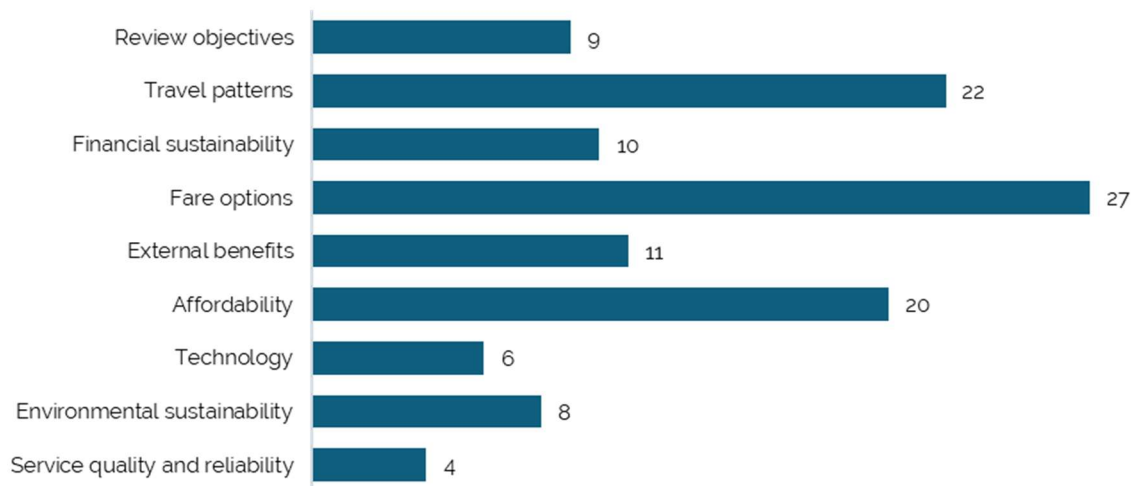
Many of the ideas that we received were well thought out and considered, although some of them fall outside the scope of our review. We have included some other ideas that were important to stakeholders, these include:

- "A fare free zone in the CBD like Melbourne has." – 3 votes.
- "There should not be a penalty for changing service types when the destination is the same." – 3 votes.
- "A simple, easy to understand fare system that's the same for all modes of travel. The current system is very complex and hard to understand." – 2 votes.
- "The peak hours were tweaked during COVID to prevent spreading disease - never changed back. They are too broad, making off-peak travel hard." – 2 votes.
- "I think fares should be calculated more precisely based on exact distance, so that users are not charged a high amount for very short trips." – 2 votes.
- "Get rid of the airport access fee." – 2 votes.
- "National fixed monthly price, similar to Germany. Pay \$50 - \$100 per month and use any public transport anywhere in the country." – 1 vote.

3 What we heard from submissions

We received 23 submissions to our Issues Paper from stakeholders. 18 submissions came from individuals, 3 submissions came from community organisations, 1 came from a peak body (BusNSW) and 1 from local government. We asked stakeholders for feedback on key issues. The issues most commonly raised in submissions are listed in Figure 3.1.

Figure 3.1 Which issues were discussed the most in submissions



3.1 Summary of stakeholder comments

We have summarised the main stakeholder comments in Table 3.1 and grouped them by theme.

Table 3.1 Summary of stakeholder feedback on key issues

Key Issue	Stakeholder feedback
Review objectives	<ul style="list-style-type: none"> The key objective should be to maximise public transport use over optimising the efficiency of public transport. (J. Leung) Price signals through mode based fares will not lead to a passenger behaviour change because many passengers are limited in the choices of modes. (R. Sandell) A simple, low cost fare structure is a key objective that should be focused on, because it supports Seniors/Retirees. (Association of Independent Retirees) IPART's overall goal should be accessibility and affordability. Low prices would not incentivise too many people to use a service. (Combined Pensioners and Superannuants Association of NSW) Newcastle and the Hunter should be viewed separately to Sydney in decisions regarding public transport pricing, cheaper fares could allow passenger to use the extra capacity currently not being utilised. Newcastle has also had separate fares and a fare free zone in the past. The use of public transport is different in the Newcastle and Hunter areas and there has been less investment. (W24/535), (City of Newcastle) Specific area-based pricing could be introduced, e.g. for Newcastle (City of Newcastle)
Travel patterns	<ul style="list-style-type: none"> An individual's experience was that the weekly cap encouraged additional public transport use on the weekends (Anonymous W24/37) Seniors are more likely to use public transport during off-peak hours (Association of Independent Retirees)

	<ul style="list-style-type: none"> • Modal split for working families is based on time rather than fare prices. convenience such as parking availability is a factor in decision making. The 8% share of trips on public transport is very low and that Sydney would need 100s of kms of light rail on all major roads, branching out into the suburbs, in order to increase this percentage materially. (M. Mushalik) • Studies by the Institute of Transport and Logistics Studies (ITLS) suggest that up to 70% of peak trips could switch out of the peak if the appropriate incentives were in place. This would help increase use of off-peak capacity and take pressure off increasing crowding in the peaks on trains, and also some bus services. (BusNSW) • Unlike Sydney, there are very few public transport services in Newcastle that have capacity issues, many services have excess capacity. While rates of single occupant car use are high and these trips could be made via active transport or public transport. (Anonymous W24/535), (City of Newcastle)
Financial performance	<ul style="list-style-type: none"> • Fares should be lower or even free. (X. Minter), (B. Watson-Will) • Reducing fare evasion would support the financial performance of the network and not require increases in fares. (Anonymous W24/43) • The price of fares would not drive the sustainability of public transport. (J. Leung) • IPART previously excluded depreciation costs of public transport, but omitting may distort efficiency estimates. (R. Sandell) • Taxes also play an important role in paying for public transport. (Association of Independent Retirees) • The metro line from Chatswood to Tallawong (Metro North West) was opened in May 2019. Similarly, the light rail line L2 opened in December 2019. So data is now available for the whole period 2020-2023. Therefore, analysis of cost and revenue for these 2 new lines should be done separately. That will also help to look at the COVID-19 impact on patronage in a consistent way. The cost for the Metro North West should include: CAPEX <ul style="list-style-type: none"> - construction costs of tunnels, stations and associated works from Epping to Tallawong - the (unnecessary) conversion costs of the Chatswood – Epping tunnel - cost of interest on debt A cost number of \$8.3 bn was given. Which accounting rules will be applied to annualize CAPEX of these long term investments? OPEX <ul style="list-style-type: none"> - the annualised net contract value of \$3.7bn with MTR over the period 2014-34. What was the assumed inflation? (M. Mushalik)
Fare options	<ul style="list-style-type: none"> • The \$2.50 daily cap for the Gold card should remain in place (Anonymous W24/396), (Association of Independent Retirees), (Combined Pensioners and Superannuants Association of NSW), (Anonymous W24/381) • Half price trips after 8 journeys are more useful than current discounts for Friday, Saturday and Sunday (Anonymous W24/339) • A decreasing scale for opal fares as customers use Opal services (J. Leung) • The current fare structure heavily subsidises long distance journeys and therefore doesn't accurately estimate the cost of these journeys. The price difference between ferries and other modes should be reduce, ferries should have no off-peak fares, and when a passenger transfers between modes they should only pay the fare applicable to the most expensive mode of travel (R. Sandell) • The \$2.50 Gold Opal daily cap should be expanded to include people receiving any amount of JobSeeker payments (Combined Pensioners and Superannuants Association of NSW) • The \$2.50 Gold Opal cap should only apply for travel in metropolitan areas and should be increased for longer distance travel (A. Martin) • Newcastle should have a specific area based fare structure. This should consider the strategic goals of public transport in the area, the availability of services and the ability of the community to pay (Anonymous W24/567) • Allow free travel on bus routes that have low patronage and that are feeder routes for other modes of travel (Anonymous W24/981) • Increase the distance of the fare bands to allow cheaper travel for short bus trips (Anonymous W24/981) • Link fares between ferries and buses, so that ferry travel after a bus would be free. To encourage people to take the bus to wharves rather than other modes of travel (Anonymous W24/981) • The fare structure needs to remain simple and easy for passengers to understand and navigate. Complex fare rules are considered a disincentive to bus travel (BusNSW) • Remove 3.21km increase to trip distance when travelling into the CBD (Anonymous W24/532)

	<ul style="list-style-type: none"> • Train stations without a direct service to Central or the Sydney CBD should have reduced fares to incentivise public transport use and encourage passengers to use public transport to travel to the stations that have direct lines to Central instead of driving to these stations. (Restore T2 Inner West Line & Save T3 Bankstown Line)
<p>External benefits</p>	<ul style="list-style-type: none"> • The current approach ignores traffic jams which are mostly made up of environmentally unsustainable private motor vehicles. This extends to road planning as well. (J. Leung) • the Gold Opal card provides social and health benefits to seniors, economic benefits from reduced congestion and environmental benefits. (Association of Independent Retirees), (Anonymous W24/381) • Public transport provides benefits through independence and social inclusion, allowing participation in the community, and improvements in physical and mental wellbeing. (Combined Pensioners and Superannuants Association of NSW) • Public transport offers a multitude of external benefits that extend beyond individual passengers and impact society as a whole. One significant advantage is its role in reducing road congestion. By providing an efficient alternative to private car usage, public transport alleviates traffic congestion, especially in urban areas where heavy traffic is prevalent during peak hours. This reduction in congestion not only improves travel times for commuters but also enhances the overall efficiency of transportation networks, benefiting both road users and public transport passengers alike. (BusNSW) • Public transport contributes to reducing pollution, particularly in terms of greenhouse gas emissions and air pollutants. As buses, trains, and other forms of public transit generally emit fewer pollutants per passenger compared to individual cars, their widespread use helps mitigate environmental degradation and improve air quality. (BusNSW) • All levels of government need to do more to encourage a modal shift to active and public transport. Modal shift has proven health, social, environmental, and economic benefits, while also freeing up road capacity and parking for those who need to drive. (Anonymous W24/535)
<p>Affordability</p>	<ul style="list-style-type: none"> • Fares are too expensive and that they should be kept as low as possible. (X. Minter), (B. Hayne) • The system does not consider heavy public transport users who are not eligible for concession benefits (Anonymous W24/339) • Public transport should be affordable and accessible to people on low incomes across New South Wales. The cost of a ticket can mean the difference between leaving the house and staying in, especially as many people on low incomes face additional considerations such as disability and travel distance or lack of car ownership, that makes different forms of transport impossible. (Combined Pensioners and Superannuants Association of NSW) • Existing public transport prices in Newcastle discourage people from using public transport. Passengers in Newcastle have a lower salary than those that drive or use active transport (except for train passengers) (City of Newcastle)
<p>Technology</p>	<ul style="list-style-type: none"> • Support greater transparency of contactless payments to encourage informed decisions by passengers. (Association of Independent Retirees) • New options like an Opal account linked to a specific bank account to allow prepayment or payment limits and/or a digital Opal card (Combined Pensioners and Superannuants Association of NSW) • Allow families to link cards together to get discounts (Anonymous W24/981) • Change Opal readers to make them more user friendly (Anonymous W24/981) • Allow concession benefits to be accessed via contactless payments (Anonymous W24/981)
<p>Environmental sustainability</p>	<ul style="list-style-type: none"> • We should be encouraging more people to use public transport to reduce pollution and the impacts of climate change (X. Minter), (B. Watson-Will), (J. Leung), (Anonymous W24/381) • Improvements in the environmental sustainability of public transport should be funded through taxes instead of fares Because it provides significant external benefits, including environmental, (Combined Pensioners and Superannuants Association of NSW) • Attempting to recover costs related to establishing a more sustainable public transport network by raising fares would be counterproductive. Instead, Instead the NSW Government should allocate funding from alternative sources. This approach is justified by the significant external benefits that such a network would offer to the broader community, emphasising the need for government investment to achieve long-term sustainability goals while maintaining affordable and accessible public transport options. (BusNSW)
<p>Service quality and reliability</p>	<ul style="list-style-type: none"> • Fares need to be in line with the reliability of public transport services. The quality of services (uncleanliness and delays in services) do not justify the cost of current Opal fares. (Anonymous W24/41) • Higher fares should be a reward for improved performance, provided that improved performance is evident and that the burden of higher fares is born by peak usage passengers given their usage is likely to drive costly capital improvements (Association of Independent Retirees)

- People on low incomes would be unable to pay more in fares to improve service performance. Given the external benefits of public transport, improvements should be funded by government subsidies (**Combined Pensioners and Superannuants Association of NSW**)

Other issues raised by stakeholders that relate to the Opal network included:

- benefits for groups such as students and pensioners.³⁹
- greater enforcement of increasing fare evasion.⁴⁰
- transport for NSW staffing levels.⁴¹

We have considered all the comments, ideas and questions we received in the Issues Paper. We have explained our consideration and analysis of many of the issues raised in our [Draft Report](#) and information papers titled:

- Information Paper - Affordability,
- Information Paper - Fare package options,
- Information Paper - Financial and operational performance,
- Information Paper - Form of determination,
- Information Paper – Modelling socially optimal fares,
- Information Paper – Patronage.

Appendices

A Ideas tool contributions

Table A.1 lists all the contributions that we received from stakeholders via the ideas tool on the Have Your Say website.

Table A.1 Contributions from stakeholders via the ideas tool

Ideas tool contributions
Birrong & Yagoona commuters should have reduced fares to encourage public transport usage as both stations won't have any trains to Central
The Opal Card is a fantastic resource but it won't make any money if the card readers don't work. B-line bus readers work only half the time
Australia's other capital cities have cheaper daily transport caps. See what they're doing and see if it'll work for Sydney
Can we please have the OPAL Card statewide? Why not have it valid in Cooma or Shoalhaven or Broken Hill or Wagga or Byron?
Move the off-peak from 10:00am to where it used to be Pre-COVID 9:00am. This will encourage workers to opt in to start working a bit later.
Get rid of the airport access fee
Free public transport. Then so many more people will use it and this absurd Opal system can be abolished.
For train, the current shorter distance (0-20km) travel is heavily subsidising longer distance (35-65km, 65km+). Unfair
For train travel in or out of the Sydney CBD, a distance of 3.21km is automatically added. This is very unfair and should be changed.
With increase in cost of living and public transport is a great way to offer low income earners and disadvantage people to be connected.
Add more retailers for Opal top up and station ticket office should have buying/recharge Opal card
Make it much easier and faster to have fares adjusted when needed; staff do a terrible and rude job of this, especially for complex journeys
Shorten peak periods to what they were pre-COVID: ending at 9:00 AM for the morning peak period and 6:00 PM for the evening peak period
Allow Opal Cards to be added to Opal Wallet.
Monthly cap for opal fares.
Reduce the prices to encourage more people to take public transport. Especially in regional/outskirts of Syd
There should not be a penalty for changing services types when the destination is the same.
A fare free zone in the CBD like Melbourne has.
Significantly cheaper fares for short distances like only 1 or 2 stops to encourage local usage.
Significantly reduce fares or make it free. Public transport is not meant for profit, it's meant to help people get around.
Eliminate the need to tap off when tapping onto another mode (e.g. tram to train). Would reduce queueing to tap off in busy locations
Easy ways to reverse a tap on
A simple, easy to understand fare system that's the same for all modes of travel. The current system is very complex and hard to understand.
National fixed monthly price, similar to Germany. Pay \$50-\$100 per month and use any public transport anywhere in the country.

Discount for health care workers. Govt is already taking away free parking. FREE travel if service is unreliable i.e. cancellations.

More enforcement of fare evasion so honest people don't subsidise those who don't pay.

The peak hours were tweaked during COVID to prevent spreading disease- never changed back. They are too broad, making off-peak travel hard

Add opal to Apple wallet

Concession rates for all low income health care card holders

No restrictions on concession for tertiary students

Simple, pause immigration, allow services to catch up, like water, electricity, housing schools, hospitals but who would expect Gov. logic.

Pls include Lane cove ferry in network

Weekly and daily caps. Discounts if services are late - why do we pay when services are flawed. Free weekday travel one day a month

Local shopping centre and no where available to top up my card.!

Opal top up machine fees for businesses should be more affordable. No one is offering this service anymore too expensive for them.

Options to top up my opal card besides online. I don't want my seniors opal card connected to my bank. Some shops have stopped this service.

I think fares should be calculated more precisely based on exact distance, so that users are not charged a high amount for very short trips.

Daily caps of \$5. Flat rate for all buses and light-rail capped at no more than \$3 per trip.

Flat rate of no more than \$4 for all trains.

Maybe make concession fares a little bit more cheaper, because sometimes I can only afford to put \$5 on my opal, which doesn't get me far

Bring back the Funday Sunday. The daily caps fare \$8 (adult) for travel on Friday is not useful for family as we all working and studying.

Weekly travel cap discounts for regular commuters. 8 trip discount. Sunday fundays with 2.50 cap like before.

Revert back the pre-COVID peak travel times. Shorten peak hours. Bring back 8 trips then free travel for the week.

Make travel capped at \$2.5 a day up to age 25, they need it. Remove non-means tested seniors card, wealthy aged shouldn't be subsidised.

Keep the weekly cap we need the weekly cap particularly in this environment

Tap on tap off system is supposed to work but there are many fare evaders. This has come about due to reduced staff. FREE FOR ALL IS ANSWER.

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- ¹ Anonymous (W24/339), submission to IPART Issues Paper, February 2024, p 1.
- ² Hayne, B, submission to IPART Issues Paper, February 2024, p 1.
- ³ Anonymous, (W24/396), submission to IPART Issues Paper, February 2024, p 1.
- ⁴ Anonymous (W24/339), submission to IPART Issues Paper, February 2024, p 1.
- ⁵ Sandell, R, submission to IPART Issues Paper, February 2024, p 3.
- ⁶ Anonymous (W24/532), submission to IPART Issues Paper, March 2024, p 1.
- ⁷ Anonymous (W24/37), submission to IPART Issues Paper, February 2024, p 1.
- ⁸ Contributor, NSW Government Have your say website – Setting maximum Opal fares until 2028, accessed April 2024..
- ⁹ Contributor, NSW Government Have your say website – Setting maximum Opal fares until 2028, accessed April 2024..
- ¹⁰ Contributor, NSW Government Have your say website – Setting maximum Opal fares until 2028, accessed April 2024..
- ¹¹ Anonymous (W24/981), submission to IPART Issues Paper, March 2024, p 4.
- ¹² Contributor, NSW Government Have your say website – Setting maximum Opal fares until 2028, accessed April 2024..
- ¹³ Contributor, NSW Government Have your say website – Setting maximum Opal fares until 2028, accessed April 2024..
- ¹⁴ Anonymous (W24/339), submission to IPART Issues Paper, February 2024, p 1.
- ¹⁵ Contributor, NSW Government Have your say website – Setting maximum Opal fares until 2028, accessed April 2024..
- ¹⁶ Anonymous (W24/981), submission to IPART Issues Paper, March 2024, p 6.
- ¹⁷ Contributor, NSW Government Have your say website – Setting maximum Opal fares until 2028, accessed April 2024..
- ¹⁸ Contributor, NSW Government Have your say website – Setting maximum Opal fares until 2028, accessed April 2024.
- ¹⁹ Contributor, NSW Government Have your say website – Setting maximum Opal fares until 2028, accessed April 2024.
- ²⁰ Anonymous (W24/981), submission to IPART Issues Paper, March 2024, p 5.
- ²¹ Anonymous (W24/981), submission to IPART Issues Paper, March 2024, p 5.
- ²² Contributor, NSW Government Have your say website – Setting maximum Opal fares until 2028, accessed April 2024.
- ²³ Martin, A, submission to IPART Issues Paper, January 2024, p
- ²⁴ Anonymous, (W24/41), submission to IPART Issues Paper, January 2024, p1.
- ²⁵ Watson-Will, B, submission to IPART Issues Paper, February 2024 p .1, Leung, J, submission to IPART Issues Paper, February 2024, pp 1-2, Bus NSW, submission to IPART Issues Paper, March 2024, p.9.
- ²⁶ Minter, X, submission to IPART Issues Paper, January 2024, p 1.
- ²⁷ Watson-Will, B, submission to IPART Issues Paper, February 2024, p 1.
- ²⁸ Leung, J, submission to IPART Issues Paper, February 2024, p 1.
- ²⁹ Anonymous submission to IPART Issues Paper, January 2024, p 1.
- ³⁰ Anonymous submission to IPART Issues Paper, January 2024, p 1.
- ³¹ Watson-Will, B, submission to IPART Issues Paper, February 2024, p 1.
- ³² Association of Independent Retirees, submission to IPART Issues Paper, February 2024, p 1.
- ³³ Anonymous (W24/381), submission to IPART Issues Paper, February 2024, p 1.
- ³⁴ Anonymous (W24/43), submission to IPART Issues Paper, January 2024, p 1.
- ³⁵ Martin, A, submission to IPART Issues Paper, January 2024, p 1.
- ³⁶ Transport for NSW, Household Travel Survey. July 2023.
- ³⁷ Transport for NSW, Household Travel Survey. July 2023.
- ³⁸ NSW Government, NSW Government Have your say website – Setting maximum Opal fares until 2028, accessed April 2024.
- ³⁹ Association of Independent Retirees, submission to IPART Issues Paper, February 2024, Minter, X, submission to IPART Issues Paper, January 2024, Martin, A, submission to IPART Issues Paper, January 2024, Combined Pensioners and Superannuants Association of NSW, submission to IPART Issues Paper, March 2024.
- ⁴⁰ Anonymous, (W24/41), submission to IPART Issues Paper, January 2024, p 1, Anonymous (W24/43), submission to IPART Issues Paper, January 2024, p 1, Watson-Will, B, submission to IPART Issues Paper, February 2024.
- ⁴¹ Watson-Will, B, submission to IPART Issues Paper, February 2024.