

18 September 2024

Independent Pricing and Regulatory Tribunal
Ms Jennifer Vincent
Director, Pricing
PO Box K35
Haymarket Post Shop, NSW 1240

Submitted via email [REDACTED]

Dear Jennifer,

RE: Review of maximum fares for rank and hail taxi services in NSW

Thank you for the opportunity to respond to the **review of maximum fares for rank and hail taxi services** on behalf of people with disability.

People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability. Established in 1981, we are a peak, non-profit, non-government organisation that represents the interests of people with all kinds of disability.

The problems

For people with disability, access to accessible public transport is essential, to enable travel to work, education, essential services and recreation. Many parts of NSW are not served by trains, light rail or accessible busses and people with disability rely on taxis to provide public transport for the whole of journey, or the 'last mile' connection between public transport services and their destination.

When we reached out to our members, they raised the issues of:

- Taxi drivers refusing to carry folded wheelchairs
- The unavailability of accessible taxis
- Taxi drivers refusing jobs that involve tying down wheelchairs
- Wheelchair accessible taxis not turning up
- Taxi drivers refusing jobs they deem to be 'too short'
- Persistent problems with accessible taxis going back to the early 2000's
- Taxi drivers refusing to carry passengers from interstate who do not have the NSW card
- The unavailability of accessible taxis in many parts of NSW
- The unreliability of accessible taxis and the impact of this for people trying to attend appointments, work, education and social events

The need for review

PWDA appreciates that a lot has changed since IPART last reviewed taxi fares in 2018. Taxi licenses cost far less to apply for and are not limited to a specific area of operations. Fuel, repair and other costs associated with running a taxi have increased, as have the living costs and pressures on drivers.

Questions

1. What are your views on the level and nature of competition in the rank and hail market?
Does it vary by region of NSW or by time of day?

PWDA is aware that whilst services in metropolitan NSW can be limited and unreliable, in much of NSW they are non-existent. We hear from our members that even areas where accessible taxi services exist, they may not run at night.

2. What are the main differences between operating rank and hail services and booked services?

Members report that they usually cannot access rank and hail services, in places where booking may be possible. We have heard repeatedly that drivers refuse to fold and store

wheelchairs or other assistive devices, for people with disability who are able to transfer and use a regular taxi seat.

3. What changes have you seen that impact services, costs and prices since the 2017 regulatory framework came into effect?

We are aware that NSW taxi drivers used to be able to be paid a 'lift fee' that could be applied to situations where a person's assistive technology could be packed away once they have transferred to a regular seat. Enabling this fee to be accessed for this purpose by taxi drivers and other point to point operators could help for the proportion of people who can transfer – freeing up accessible taxis for wheelchair users who cannot.

We are aware that wheelchair accessible taxis have reduced in rural and regional NSW, and that even in Sydney they may be driven more often to pick up passengers from the airport than people with disability.

We have heard from members that some taxi drivers refuse to run the meter, demand extra or excessive fees, or refuse to accept users of the Taxi Transport Subsidy Scheme. Our members who are guide dog handlers frequently face taxi refusal, although we hope that the new increased penalties may assist with this.

4. Is the cost of providing taxi services increasing, stable or declining? What evidence is there that costs are changing?

PWDA cannot comment from an experience of running taxis, however we can say that **average petrol prices in 2018** ranged between \$1.19 and \$1.59 per litre, and **in 2024** they have risen to \$1.77. Transport worker award wages and overall cost of living have also increased. We also hear during our participation in Taxi Council of NSW meetings that drivers struggle with increasing costs.

5. Are current fare levels too low, too high or about right?

PWDA recognises that taxi drivers may be facing increased costs and need fare increases to run sustainable businesses. However, increasing the cost of fares that people with disability have to pay will present hardship, especially to those on low incomes. If rates are to increase, we call for the rate of subsidy to increase, rather than the fare customers with disability pay.

6. Maximum fares for rank and hail are currently set using fixed components including a hiring charge, distance rates and waiting time rates. Do you have suggestions for an alternative approach?

At present only taxis are allowed to be hailed at taxi ranks and no equivalent waiting areas are designated for ride-share vehicles. In many areas drivers of taxis and ride-share vehicles are reluctant to stop and assist customers with disabilities into vehicles, for fear of being booked.

PWDA recommends the following measures be explored:

- Increased allocation of space, and number of places, for taxi and ride-share vehicles to enable people with disability to safely embark and disembark from vehicles
- Offering a payment to taxi and rideshare vehicles where drivers assist with loading or unloading mobility equipment
- A bonus system that applies to the wheelchair accessible taxis to encourage their use to provide service to people with disability, rather than just being used for large groups or non-disabled customers
- The expansion of the Uber-hailing system used at Melbourne Airport to airports in NSW

7. Pre-booked fares can vary depending on supply and demand conditions. Should maximum fares for rank and hail services also be allowed to vary depending on local conditions?

Variable fares can create undue hardship for people with disability on low incomes, who may have no other alternative to using a taxi. PWDA recommends applying a bonus scheme for drivers that could be applied based on carrying a greater number of customers with disability and/ or customer feedback score. This scheme could be funded from fines revenue.

8. There are currently two fare zones ('urban areas' and 'country areas') in TfNSW's fares order. Should there be different zones and why?

PWDA is not aware of a need for additional zones, however we are aware that operating a taxi can become more difficult in areas that are poorly served by mechanics, or that have been impacted by natural disasters.

We are acutely aware that in many NSW communities there is no accessible public transport alternative and calling a taxi from the nearest town it is based in would require a lengthy journey. There may be a case for another zone, the application of a subsidy, or other measure, to ensure that people with disability in these communities can travel by taxi when they need to.

9. What factors are impacting the sector's willingness and/or ability to offer wheelchair accessible taxi services?

PWDA is unable to comment on the willingness of the sector, but we have heard in the meetings of the Taxi Council of NSW that some drivers fear stopping when hailed by a wheelchair user due to fines. A coordinated approach between State and Local Governments is needed to provide space to enable safe taxi and rideshare hailing and loading.

10. If you are a taxi driver, do you ever have trouble getting passengers from ranks, or from street hails? Do you have to wait for long periods before getting a passenger in either of these ways? What do you see as the main issues?

Not applicable

11. If you are a taxi passenger, do you ever have trouble catching taxis from ranks, or hailing taxis from the street? Have you experienced fare refusal or other problems? What do you see as the main issues?

PWDA has already shared a number of problems our members have experienced. We have also heard in meetings of the Taxi Council of NSW and during our work with the Accessible Transport Advisory Council of repeated fare refusal for guide dog handlers, assistance animal users and, the stress of being unable to rely on taxis to make it to work or important appointments on time.

Unfortunately, even when drivers are informed of their responsibilities, or of penalties for refusal, this has not changed behaviour. The onus is placed on the person with disability to make a complaint- and this does not actually achieve change when it is most needed.

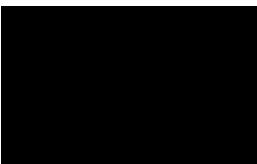
We have also heard of the difficulties people have who cannot use apps to book services or track the progress of their vehicle. Apps are not accessible to everyone, and quality services by telephone are needed.

Solutions and quick wins

PWDA is a solutions-focussed organisation, and we call on the Government to explore and trial the following measures:

- Enable taxi and ride-share drivers to access a payment for the loading, storing and unloading of assistive equipment for people with disability who are able to transfer to an ordinary vehicle seat
- Trial 'mystery shop' style audits by government, where fines could be issued for drivers who refuse fares, cancel trips or whose behaviour fails to meet acceptable inclusion standards
- Reserve the fines revenue to use to fund a monthly prize draw for drivers with one entry in the draw per trip carrying a person with disability who gets a fare subsidy, and a second entry per trip if good customer feedback is given
- Develop design templates and guidance for taxi and rideshare drop-off areas and share these with Local Councils to ensure that sufficient allocation of bays and dimensions are provided in the places they are needed
- The development of short videos featuring people with different disabilities, on key topics, that could be used to educate all drivers

Yours sincerely



Megan Spindler-Smith
Deputy CEO
People with Disability Australia