

**4<sup>th</sup> May 2017**

(By email: [pointtopoint@transport.nsw.gov.au](mailto:pointtopoint@transport.nsw.gov.au))

## Response to: Regulatory Impact Statement and Point to Point Transport Regulation 2017

The **Newcastle Taxi Association (NTA)** represents taxi plate owners and operators throughout the Newcastle and associated Hunter regions. Newcastle is NSW's second largest city, and the centre of unprecedented government and business investment relative to integrated transport and tourism industries, as well as the centre of new technologies and substantive population growth.

NTA has strong concerns that the proposed regulations have many gaps and do not address issues of unfinished business for the Point to Point Transport industry, and has generally classed Newcastle as a 'capital city' entity rather than a regional centre which differs considerably from a major suburban area like Sydney.

We have a strong desire to work with regulators to achieve a first class, safe, and customer friendly framework for all consumers and industry participants. We also want to see the Newcastle regions being uniquely seen as a credible internationally recognised integrated service destination for NSW. We submit that because of the many gaps identified in both your Regulatory Impact Statement and draft Point to Point Transport regulations, we urgently require further discussion and agreement.

### **Significant gaps include:**

- The credibility of the Commissioner's policing role;
- Implications for Superannuation holders on an asset valuation basis;
- Notification of effective Hardship Provisions;
- The rollout of the \$1.00 fare collection levy;
- Level playing field implications including costs and CTP insurances;
- Public Identification of ridesharing service providers;
- Where the cost of administration and enforcement of passenger transport will be both held and provided for;
- Proposed inclusions for Safety Management Systems;
- Clarification of taxi operators ability to apply for being a provider of booked passenger services for private bookings;
- Operational matters such as like deregulated fare calculations;
- Taxation liabilities to ridesharing providers;
- Taxation liabilities for ridesharing drivers;
- Assessments of competitive neutrality; and
- Publication of all public submissions to these changes.

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As you are aware there are still serious aspects confronting the industry, its future, and the impact not only to individuals but to the nation. We submit that there are considerable tax collection losses incorporated in these new regulations, and a present inability to proactively track and police ridesharing operators.

We make ourselves available to discuss in details any of these issues from an industry participant perspective as we feel that a forward strategy to the benefit of all consumers and operators has not been established.

Yours sincerely

***For and on behalf of the entire Newcastle Taxi Association***