

NSW TAXI OWNER, OPERATORS, AND DRIVERS ASSOCIATION Inc

(ABN 98 653 928 763)

36 Cosgrove Crescent, Kingswood NSW 2747

President: Anne Turner

To: Point to Point Implementation
Transport for NSW
PO Box K659
Haymarket NSW 1240

Email: pointtopoint@transport.nsw.gov.au

4th May 2017

**RESPONSE TO:
Regulatory Impact Statement
Point to Point Implementation**

The **New South Wales Taxi Owners, Operators, and Drivers Association (TODA)** represents taxi plate owners, operators, and drivers throughout New South Wales.

NSW TODA 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.

With a strong desire to work with regulators to achieve a first class, safe, and customer friendly framework for all consumers and industry participants, and a credible internationally recognised integrated service delivery for NSW, we submit our view of where further discussion and agreement is necessary, and urgently required.

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

Anne Turner

President

NSW Taxi Owners, Operators, and Drivers Association Inc.