



# **Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017**

**Motor Traders' Association of NSW**



**15 May 2017**

**The Motor Traders' Association of NSW (MTA NSW) is one of the largest state based industry associations in Australia.**

MTA NSW is widely known for addressing issues affecting Association Members through a number of initiatives, including actively lobbying at State and Federal Government levels.

Founded in 1910, the MTA NSW represents the interests of over 3,600 owners and business principals and 60,000 employees in the automotive industry throughout NSW and ACT. The Association provides extensive industry information to its membership base through a number of member forums and on-site visitations.

MTA NSW is held in high regard by industry stakeholders and offers members great value for their membership subscription with a range of services and products supplementing its traditional core services.

MTA has developed a public recognition of the MTA NSW logo and catch phrase 'Deal with someone you can trust.' Both in NSW and the ACT, MTA NSW is strongly placed to represent the interests of Members. The MTA NSW is also a Registered Training Organisation (RTO) and delivers on-site training at business premises, to apprentices in the motor trade industry.

MTA NSW is in continual contact with politicians and Government officials and regularly provides advice to them on matters affecting the motor industry. The Association is the principal consultative party and a leader in employment relations issues impacting the Retail Motor Industry in the State.

MTA NSW is a founding member of the Motor Trades Association of Australia (MTAA), which is the National Body that draws together MTA's sister organisations from other States and Territories to represent the industry at Federal Government level.

Member and industry suppliers' support is most appreciated and adds greatly to the success of the Association and the activities it undertakes.

As a peak body, the MTA NSW represents the interests of the following automotive industry participants:

Auto Dismantlers; Auto Electrical Specialists; Auto and Marine Trimmers; Auto Mechanical Repairers; Auto Transmission and Rebuilders; Automobile Dealers – New and Used; Australian Heavy Vehicle Repairers; Body Repairers; Brake Repair Specialists; Caravan Industry; Commercial Vehicle Industry; Engine Reconditioners; Exhaust System; Farm Machinery Dealers; General Trades; Hire Car and Chauffeur Driven Limousines; Motor Bus; Motor Cycle Industry; Motor Vehicle Assessor and Inspector; Parts and Accessories; Radiator Specialists; Rental Vehicles; Rustproofing Specialists; Service Stations; Steering and Suspension Specialists; Tow Truck Operators; Tyre Dealers and Retreaders.





## Executive Summary

The Motor Traders' Association of NSW (MTA NSW) appreciates the opportunity to provide a submission to Transport for New South Wales on the proposed *"Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017"*.

The members of our Hire Car/Chauffer Driven Limousine division are very proud of their operations and the contributions made to the NSW economy, which we feel are being decimated by the introduction of the Point to Point Transport (Taxis and Hire Vehicles) Act 2016 and the proposed Regulations which is the subject of this submission.

The following submission outlines our concerns as discussed in a previous meeting with officials from Transport for NSW on 5 May 2017.

## Summary of Key Points

1. Signs and Markings for Hire Vehicles.
2. Clarification of Schedule 3 Passenger Service Transactions.
3. Further recommendations
  - Current transitional arrangements HC Plates and Bus Lane Access
  - TTSS Scheme – Access for all accredited transport operators



## 1. Signs and markings – hire vehicles.

### Section 22

Whilst we agree with the concept of markings and signage, in the current format as per the draft regulations, we feel that if not amended will lead to abuse of the use of the proposed signage as there is no guidelines in relation to content of the “retroreflective sign”.

As discussed in our meeting of Friday 5 May 2017, it was mentioned this was raised as a requirement of NSW Police. Therefore we feel there should be guidelines stipulated in relation to content of these proposed signs which could include the registration number of the vehicle.

It is also recommended by MTANSW that an additional “retroreflective sign” be placed on the front left hand side of the vehicle (bottom left hand side of the windscreen) for ease of identification by the consumers and law enforcement officers.

Clarification is also required on who is to supply these “retroreflective signs”.

**MTANSW Hire Car Division recommends that for Hire vehicles, the current identifier of a “Hire Car (HC) plate” should be continued rather than a retroreflective sign as this has been the requirement in the past and has operated successfully in the past and would place no additional burden on operators who currently comply.**

## 2. Schedule 3 Passenger Service Levy

This was raised at our meeting of 5 May 2017, regarding the clarification and further definition of what is a “passenger service transaction”.

Until this is further clarified as per our request, we are unable to comment as to the content of this section contained within the draft regulations.

**It is MTANSW’s position that a passenger service transaction should be clearly identified as a booking irrespective of the number of trips involved, i.e. a booking for various pick up and drop off points by the same passenger in a single “booking”.**

**We welcome further dialogue on this topic before the release of the regulations into law as in its current format, there is too much uncertainty in the current definition. Transport for NSW have identified this and have to date been unable to supply a definition of what constitutes a “passenger service transaction”.**



### 3. Further recommendation

#### **Current Transitional Arrangements HC Plates and Bus Lane Access**

It is MTANSW's position that consideration be given to changing the current interim arrangements in relation to "HC" registration plates and access to "Bus Only Lanes".

The current restriction on the issue of "HC" number plates should be lifted to allow current Transport for New South Wales Accredited Operators (but not any new entrants into the market), the ability of obtaining "HC" plates and access to the "Bus Only Lanes", for any additional vehicles they may wish to include in their operations initially through the transition period ending in June 2020.

This would allow the operators to grow and sustain their businesses operations without any undue complications from the introduction of the Point to Point reforms, e.g. where an operator wishes to put on an additional vehicle, they are currently not able to apply or receive 'HC' number plates to affix to these additional vehicles. If these vehicles are used on a "Multi Car" booking and the route to be travelled includes a "Bus Lane", the additional vehicles are restricted in access which causes the vehicle to use different routes which can incur additional time for the customer due to traffic congestion etc.

#### **Transport Taxi Subsidy Scheme (TTSS) – Access for all accredited operators**

With the whole purpose of the introduction of the Point to Point reforms being creating a level playing field, the MTANSW feels that the current Transport Taxi Subsidy Scheme (TTSS) should be re-visited by TfNSW to enable the use of all Point to Point operators by members of the public who access this service.

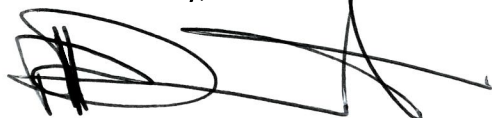
Current arrangements only allow the subsidy scheme via "Taxi's", whereas in regional and rural centres within NSW, this can be restrictive to people who are eligible under this scheme due to the unavailability of services when required.

If a true "level playing field" is to be achieved in the supply of point to point transport services, this scheme needs to be available to all TfNSW accredited transport operators (including specialist operators currently supplying assisted travel for school students) in the provision of services to people who access this scheme, hence providing more options than just taxi's which as mentioned above can be restrictive in regional and rural NSW.



The management of MTA and our representatives from the Hire Car division welcomes the opportunity of providing this submission and would welcome any further dialogue with TfNSW in relation to the introduction of the proposed Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017 and the contents of this submission.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Brenton Daniel', written over a horizontal line.

Brenton Daniel  
Senior Divisional Manager  
**MOTOR TRADERS' ASSOCIATION OF NSW**

