

Submission: Proposed Taxi and Hire Vehicle Industries Regulations 2023	
Kingborough Council's Disability Inclusion & Access Advisory Committee.	
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Kingborough Council's Disability Inclusion Access Advisory Committee (DIAAC) welcomes the opportunity to provide input into the Regulatory Impact Statement being produced in relation to Taxi and Hire Vehicle Industries Regulations 2023.

DIAAC has been proactive in informing elected representatives of the issues faced by WAT users. The issues have included:

- Inability and difficulty in accessing meetings, medical and other important appointments due to the critical shortage of WATs.
- Uncertainty around return journeys i.e. even though a return journey has been pre-booked, there is no certainty the taxi will be available to take the customer home and it appears there is no legal obligation to provide that return journey. This has led to instances of major inconvenience, humiliation, and risk for people.

It must be remembered that the *National Disability Strategy 2010-2020* identifies accessible public transport as a key factor in the capacity of a person with disability to participate in and contribute to society and the economy. Furthermore, *Accessible Island: Tasmania's Disability Framework for Action* (currently being renewed) states that the aim is "to ensure that all government departments implement socially just policies and practices for Tasmanians with disability". Introducing standards and regulations that ensure reliable public transport options are available to people with disability is socially just policymaking.

DIAAC supports the regulation changes being suggested for WATs in Tasmania in principle, however, would suggest a review of the changes after 12 months to ensure the new regulations are creating positive outcomes for WAT users and driver/operators.

Comments are included in the table below:

Legislative Reforms (taken from *Regulatory Impact Statement – Taxi and Hire Vehicle Industries regulations 2023 p.11*)

New requirement	Purpose	DIAAC comments
Increase the trip subsidy to a flat fee of \$20 split in a 50/50 arrangement with driver.	Increase the trip fee as a payment to incentivise drivers to prioritise WAT trips.	In city locations this subsidy may be sufficient, however if a WAT is required to attend to a call in regional areas - perhaps a per kilometre subsidy needs to be implemented rather than a flat fee.

Statutory obligation to give priority to pre-booked WAT work.	Driver legally obligated to undertake pre-booked WAT work, and not to refuse WAT work without a reasonable excuse.	DIAAC supports this reform.
Increase the minimum service level from one to 30 WAT trips per month, unless unreasonable to do so.	Sets the minimum service delivery to ensure that operators remain accountable and reinforces that WAT trips are the core service for a WAT.	To ensure one trip per day satisfies demand we recommend reviewing this requirement in 12 months to guarantee the number is sufficient to meet demand.
Introduce the discretion for the Commission to increase the minimum service level to a higher number than 30 WAT trips per month.	It is possible that monitoring changes in demand will show that 30 WAT trips per month is insufficient in some areas, with a higher number of trips needed.	DIAAC supports this reform
Remove maximum operating age of WAT vehicles, while maintaining the periodic roadworthiness check.	To offset shrinking number of WATs	DIAAC supports this reform.

Thank you for the opportunity to make comment.

Kingborough Disability Inclusion & Access Advisory Committee