

The Taxi Industry Reform Team  
ACT Taxi Reform Implementation Working Group  
Transport Canberra

28 April 2017

Via email: [ImplementationWorkingGroup@act.gov.au](mailto:ImplementationWorkingGroup@act.gov.au)

Dear Committee Secretary

**Submission – status of the on-demand transport market**

Thank you for this opportunity to make a submission on the status of the on-demand transport market.

We note that on 7 February 2017, the ACT Government announced the staged release of up to 50 taxi licences (10 licences each quarter from 1 March 2017) and that feedback received will assist the ACT Government to consider the second release of taxi licences, subject to market conditions, scheduled for 1 June 2017.

In making a brief submission ACTCOSS prioritises the need to plan for more accessible vehicles within the on-demand mix and the current work around transport integration including community transport, buses, taxis, ride-sharing services and light rail.

Transport is a major enabler of social and economic inclusion and community participation for all members of the ACT community, and is an integral part of community service delivery. People who are transport disadvantaged (people on low and fixed incomes, particularly if they have young children; people with disability, particularly if they rely on taxis; and people in remote parts of the city) are most likely to experience transport disadvantage. Young people and older people who rely exclusively on public transport and are also more likely to experience transport disadvantage as are Aboriginal and/or Torres Strait Islander peoples. People who are transport disadvantaged most benefit from reliable, accessible, affordable non-private transport.

Good transport infrastructure beyond privately owned vehicles is key to making Canberra a liveable, sustainable city in which all residents can participate socially and economically and enjoy the opportunities and amenities this city has to offer.

We published a detailed paper on transport issues and policy measures that would address these issues in 2016. This paper is available at:

<http://www.actcoss.org.au/publications/advocacy-publications/position-paper-transport-%E2%80%98wicked-problem%E2%80%99-we-have-strengths-and>

For this particular inquiry we emphasise the following key issues:

### *Accessibility*

There are currently 26 restricted taxi licences (WAT licences) available in the ACT with 24 WATs currently on the road, including 16 dual wheelchair capacity vehicles.

WAT users have requested the release of licences for more dual capacity vehicles to further improve wheelchair transport services for the community.<sup>1</sup>

ACTCOSS notes the concerns of member organisations, including People With Disabilities ACT (PWD ACT) about the potential for ride sharing apps to erode the number of wheelchair accessible vehicles in Canberra as taxis potentially become unprofitable or crowded out of the market.<sup>2</sup>

We note that the introduction and popularity of ride sourcing (mainly Uber) has already caused significant disruption to the ability of people with disabilities to access transportation in other jurisdictions.

Since the introduction of Uber, the number of Wheelchair Accessible Taxis (WATs) on the road in metropolitan Melbourne has decreased from 565 to below 500 and the response time has increased. The proportion of WATs on the road in metropolitan Melbourne has reduced from 15 percent to 10 percent.<sup>3</sup>

We are informed that last year PWD ACT met with a senior representative of Uber and noted a set of similar issues in the implementation to those in Melbourne. Uber were not able to identify a pathway to acquiring wheelchair accessible vehicles or how they would handle drivers seeking to transfer from the WATs network into ride sharing arrangements.

The WATs network is fragile and has a mixed service history. There have been historic problems with the timeliness and capacity of the wheelchair accessible taxi fleet in Canberra. Drivers have in the past complained that running WATs is unprofitable and have threatened to hand in WATs plates and leave the industry.

In order to ensure people with disabilities are not disadvantaged by the introduction of ride sharing technologies, and that we continue to respect and facilitate the rights of people with a disability to travel around our community with flexibility, we would support prioritising new taxi vehicles which have accessibility so that the share of accessible vehicles across the whole on demand market is maintained.

---

1 National Disability Services (ACT), *The Road Less Travelled*, September 2016, p.32.

2 PWD ACT, *2016-17 ACT Budget Submission*, PWD ACT, <<http://pwdact.org.au/index.php/policyinfo/211-pwd-act-s-2015-16-act-budget-submission#ftn2>>.

3 PWD ACT, *2016-17 ACT Budget Submission*, PWD ACT, <<http://pwdact.org.au/index.php/policyinfo/211-pwd-act-s-2015-16-act-budget-submission#ftn2>>.

We note that consultations on wheelchair taxis have also raised the issue of people feeling uncomfortable and experiencing dangerous rides in the transit buses which are almost exclusively used for wheelchair taxis.<sup>4</sup> We agree with PWD ACT that the ACT needs a diverse range of vehicles to accommodate different access needs while allowing people to travel in comfort.

We repeat our call from 2016 to collect data to monitor whether and how people with disability benefit from the introduction of ride sharing services in the ACT, e.g. track impacts on number and quality of services and impact of ride sharing on ride costs for accessible vehicles.

### *Affordability*

In relation to taxi costs, for peak rates, Canberra had (in April 2016): the highest flag fall rate; the third highest distance per kilometre rate; the third highest waiting time per hour rate and equal third highest airport rank fee (Taxi Fare Calculator 2016). While not as high, the general off - peak rates for Canberra are still some of the highest in the country (ranking second to fourth in the corresponding categories above).

The impact Uber may or may not have on these costs is not yet clear. In our 2016 work on the Taxi Industry Innovation reforms we identified the need to examine whether these reforms will result in improved services and costs for people who currently rely heavily on taxi based transport.

We repeat our call from 2016 for the ACT Government to capture and publish systematic data on changes to the market and impacts on affordability of taxis and ride share services. For example, the ACT Government should collect data to:

1. Monitor whether and how people with disability benefit from the introduction of ride sharing services in the ACT by tracking impacts on the number and quality of services and impact of ride sharing on ride costs for accessible vehicles; and
2. Assess investment in transport against the impact of transport infrastructure spending on increasing the affordability and accessibility of transport for people who are transport disadvantaged to access work, health and education facilities, food and other shopping amenities, and social networks.

### *Integration*

We note that work is underway to scope a business model and platform for the ACT Government which achieves integration and utilisation of resources in on-demand community transport in the ACT and beyond, is efficiently integrated and coordinated with public transport (buses, light rail, taxis and autonomous vehicles) and which is owned by or accountable to the users.

---

<sup>4</sup> Consultation outcomes, PWD ACT Forum on Access, presentation at the ACT Legislative Assembly, October 2015.

More integrated access to on-demand transport is supported by ACTCOSS as part of an overall strategy to improve access to transport for all Canberrans and ensure seamless paths of travel for people, including off the trunk routes of current bus and future light rail services.

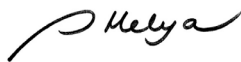
It will be important that the distinct role of community transport is recognised and maintained in this work. This means community transport needs to be funded at sustainable levels and in a manner that will ensure that community transport continues to be available to all in our community who are in need of it. That means ensuring a community transport system that is available to people eligible for an individualised funding package through Commonwealth initiatives like the NDIS or an aged care package.

In granting additional taxi licences, the ACT Government should consider incentivising new operators to be part of any new integrated system.

In this as in other areas, our transport investments should focus on supporting those with the greatest barriers to travel, get where they need or want to go to participate both economically and socially, and to enjoy the opportunities and amenities this city offers.

Thank you for considering this submission. Please feel free to contact me or our Advocacy Manager, Craig Wallace, on email at [craig.wallace@actcoss.org.au](mailto:craig.wallace@actcoss.org.au) or by phone on 02 6202 7208.

Yours sincerely,



Susan Helyar  
Director, ACTCOSS

[director@actcoss.org.au](mailto:director@actcoss.org.au)