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Your submission for this review:

18th August 2025 Action for Public Transport PO Box K606 Haymarket, NSW, 1240 Mr Albert Jean Independent Pricing and Regulatory Tribunal RE: Review of Private Ferry Fares from 1 January 2026 Dear Mr Jean, Action for Public Transport is an independent advocacy group representing the interests of people using public transport. We thank the Tribunal for the opportunity to make a submission regarding the determination of private ferry fares from 1 January 2026. Our submission is focused mainly on the financial viability of private ferry operators. We argue that without financially viable operators, there would be no private ferry services. The 2025 IPART Private Ferry Fare determination comes at a critical juncture for all private ferry fare operators. The issue of climate change has led to increasing concerns around sustainable transport and the need to adopt zero emissions technologies for transport and support the United Nations Sustainable Development Target 11.2. The tribunals discussion paper notes the high capital outlay required to purchase electric ferries, and we would anticipate some operational changes related to the time needed to charge ferries. Given the economics of private ferry services, many operated by small companies, these additional costs will have a significant business impact and may challenge the financial viability of these ferry companies. Changes to fares in the short term will be of little assistance in meeting these increased capital costs, and increased role for government subsidies will be needed. Many of the operators have aging ferry fleets and need to plan for on fleet renewal, regardless of whether diesel, hybrid or electric ferries are chosen. The current economic situation for private ferry operators has proven unfavourable in terms of promoting capital investment into their businesses. Without a paradigm shift to a model that brings longer term financial sustainability to these businesses the future operation of these much-needed ferry services will remain uncertain. Increases in fares in the short term would not raise sufficient funds to enable many of these companies to renew their fleets and would likely discourage patronage. Action for Public Transport believes that the economics of private ferry operation must be transformed and that the key to achieving this goal is to extend Opal fares to private ferry services operating across NSW. Opal fares were extended to Manly Fast Ferry services operated by NRMA in October 2023. We recommend that Opal fares be extended to the Lane Cove Ferry operated by Captain Cook Cruises from 1 January 2026 with other private ferry services across NSW to be progressively converted to Opal. The viability of private ferry services is a key issue for passengers and for operators. Many of these services are locally very important. The time for a restructuring of the economics of private ferry operations is now. Extending Opal fares will make travel cheaper for passengers leading to sustained and growing patronage over the short and medium term. It will also help operators, working with TfNSW, develop a sustainable business model, considering the need for fleet renewal and the transition to net zero emissions vessels. Kind Regards, Graeme Graeme Taylor Action for Public Transport