



Submission

Review of maximum fares for rank and hail taxi services in NSW

19/09/2024

Transport Workers' Union of New South Wales



Transport Workers' Union of NSW

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1. Summary of recommendations

1.1 The Transport Workers' Union of New South Wales (TWU) believes that this IPART review is a necessary step forward in advancing the environment of rank and hail taxis in NSW.

1.2 Below is a summary of the TWU's recommendations, which are elaborated on and contextualised further within this submission.

- Addressing taxi fares in isolation will be extremely limited in effectiveness, and detrimental for the industry in the long-term. The NSW Government must address rideshare, as a currently unregulated mode of passenger transportation that occupies the same market as traditional regulated point to point modes. Taxis will never be competitive in the current environment, and nothing will improve without Government intervention.
- With respect to the above recommendation, the TWU acknowledges that bailee taxi drivers need interim relief. The TWU supports an increase in nominal taxi fares, particularly due to the economic inequity faced by bailee taxi drivers over the last decade. However, an increase in fares must be considered a short-term solution, in line with the regulation of rideshare.
- In creating a regulatory model for rideshare, reference can be made to existing regulation and legislative frameworks, however, given the unique nature of the typical working environment in rideshare, and the differences in employment relationships, the Government will not necessarily be able to translate pre-existing terms to a hypothetical rideshare regulation. Long-term consultation between the NSW Government and the TWU is recommended.
- The NSW Government has already committed to empowering the Industrial Relations Commission (IRC) to set minimum pay and conditions for gig workers in transport. As such, the NSW Government should engage the TWU and relevant stakeholders on developing a legislative framework in which the IRC has the power and functions to enforce minimum standards and protections.
- Both taxis and rideshare workers should be subject to minimum training standards and union inductions. Given the widespread lack of industry acculturation in both spaces, and lack of knowledge regarding minimum industrial rights in the case of taxis, action is needed to raise standards of quality, reliability and safety of services.
- The invariable link between taxi driver earnings and fares is an antiquated form of remunerating bailees, particularly when it is so sensitive to patronage, and has influence over safety outcomes. To sever the connection between pay and fares, a method different to Commission and Set Pay-in is required – one that doesn't involve the driver directly taking either a percentage (or whole sum) of a fare. However, no sustainable changes can be made without regulating rideshare, as operators would likely be incapable of absorbing the costs faced with unregulated competition.
- The NSW Government should reflect on the decisions of other Australian jurisdictions



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in rank and hail. The TWU raises that the NSW Government consider indexation as an approach to setting maximum rank and hail fares. However, this must be done with the intention to regulate rideshare.

- Regional bailee taxi drivers work in conditions that are subject to extended journeys that are typically offset by longer, unpaid returns. These cost pressures require a higher tariff than metropolitan areas. The NSW Government should consider the reintroduction of the return fare for longer journeys between regional towns.
- Currently, Wheelchair Accessible Taxi Services (WATS) in NSW carry a \$16.50 loading fee. Victoria, however, carries a \$30.00 loading fee for WATS, along with a \$12.20 loading fee for conventional taxis. The TWU recommends that the NSW Government considers raising the NSW WATS loading fee, in line with Victoria.
- Further consultation between the NSW Government and the TWU on all related matters.

2. About the TWU

- 2.1 The TWU represents tens of thousands of people in Australia's road transport, aviation, oil, waste management, gas, passenger vehicle and freight logistics industries.
- 2.2 With over one hundred years' experience representing the workers who conduct Australia's crucial passenger and freight transport tasks, the TWU has been proactive in advocating for the establishment and improvement of industry standards which advance the lives and safety of transport workers, their families and the community at large.

3. Introduction

- 3.1 The TWU welcomes the opportunity to contribute to the *Review of maximum fares for rank and hail taxi services in NSW*. By virtue of a long-standing representational history of transport workers, the TWU has a unique understanding of the industry, as well as the needs of taxi drivers themselves.
- 3.2 In the IRC, the TWU is the entity armed with the capacity to represent taxi drivers. The TWU has always sought to improve conditions within this often-overlooked sector of the transport industry, and believes this review is a much-needed step forward.
- 3.3 Within this submission, the TWU will address the terms of reference, either directly or indirectly, with respect to the issues paper that was released alongside the call for submissions. Additionally, further context and industry-wide issues that either contribute to, or somehow influence the space of taxis will be discussed and elaborated on where applicable.

4. Industry context & the limitations of altering fares



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- 4.1 Taxis are crucial in NSW communities, providing adaptable transportation that complements regular scheduled transport services. The flexibility of taxis is especially important in areas with limited public transport coverage, during late hours, or for individuals with specific needs – such as the elderly or the disabled. Traditionally, this has been an undisputed consensus among industry and community.
- 4.2 Despite this, taxis are often overlooked in the space of transportation agendas, and as a mode of point to point transport, have suffered a degradation of industry standards due to a variety of influences. However, there remains a key offender – rideshare platforms. Realistically, the emergence of Uber as an unregulated mode in NSW has irrevocably altered not just the taxi landscape, but the function and culture behind passenger transportation as a whole.
- 4.3 For a bailee taxi driver, pay is invariably linked to fares. Under the *Taxi Industry (Contract Drivers) Contract Determination, 1984*, taxi drivers have two methods of payment to choose from. The first is “Commission”, which involves keeping a percentage of all fares taken – 45 per cent in the first year as a driver in the industry, and 50 per cent beyond that point.
- 4.4 The second method of payment is “Set Pay-in”, where the bailee must pay the taxi operator a fixed amount under the Determination (or less, if agreed upon) for their shifts, with the burden of covering additional costs such as fuel and car wash. However, the bailee keeps the rest of the money made from fares.
- 4.5 Given that there has not been an increase in taxi fares for an entire decade, for bailee drivers, this effectively means that they have not received an actual pay rise in that time. Point to point transport is a low-paid profession where, as mentioned, drivers and operators are dependent on the price of fares. The lack of an increase in nominal fares since 2014 has done nothing to benefit the workers in this sector of transport. While they remain in the same place, the rest of the world does not; the cost of living has significantly increased, as has the cost of operation. It is therefore no wonder why service quality has suffered, honest practitioners have collapsed, and current drivers struggle to make ends meet.
- 4.6 Regarding the methodology of rank and hail fares, given the connection to remuneration, the TWU argues that there is a fundamental problem in having pay linked to actual fare collection and patronage. Through no fault of a taxi driver, there is no certainty to what their earnings will be on any given day or night. This requires an assessment of the whole rank and hail structure, and how taxi drivers are remunerated. However, this cannot be done by examining traditional point to point transport in isolation; rideshare platforms must also be addressed alongside taxis.
- 4.7 The primary issue is that rideshare platforms remain completely unregulated whilst occupying the same market as traditional point to point transportation. The situation in the market is one of a regulated mode of transport versus a completely unregulated one. It will never be competitive for taxis to occupy the same space as rideshare under such circumstances.
- 4.8 A level playing field is needed in the market, and can only be achieved through a whole market approach. It is worth considering that a “uniform” regulatory arrangement be established for both taxis and rideshare, however, the TWU acknowledges that despite their challenging presence in the same market, there remains individual nuances to both taxis and rideshare



that need to be accounted for. Nevertheless, if a regulatory regime that maintains similar conditions for both sectors is to be established, the cost of labour must absolutely be addressed, otherwise the industry will never be on an equal footing.

- 4.9 In the development of a regulatory model for rideshare workers, reference should be made to existing legislation and frameworks – for example, WHS legislation outlines points that could prove effective in guiding safety standards and baseline protections for workers. However, WHS legislation, in the context of rideshare workers, does not account for the nature of the work. As legislation, it is aligned with traditional work arrangements and environments, whereas rideshare is a unique, on-demand work arrangement within the chaotic gig economy, with a working environment and conditions that are foreign to the norm.
- 4.10 Therefore, while using existing legislation and regulatory models for reference and guidance, the fact of the matter is that rideshare requires a form of regulation that directly addresses its unique nature. The NSW Government can use what exists as reference, but may not necessarily be able to directly copy existing terms to a rideshare regulation. In context, the existing *Point to Point Transport (Taxis and Hire Vehicles) Act 2016* and *Point to Point Transport (Taxis and Hire Vehicles) Regulation 2017* that taxis are subject to may also be useful in taking inspiration for a rideshare regulation, particularly regarding the nature of working arrangements and employment relationships.
- 4.11 In the current state of rideshare, protections for workers are long overdue. In July 2024, the Minns Labor Government announced a commitment to empower the IRC to set minimum pay and conditions for gig workers in the transport sector – a commitment that the TWU wholeheartedly supports, and congratulates the NSW Government on the announcement¹. To achieve the intended purpose of this commitment, the NSW Government should engage the TWU and relevant stakeholders in developing a legislative framework in which the IRC has the power and functions to enforce minimum standards and protections.
- 4.12 Both traditional point to point transport and rideshare are environments where many workers are not knowledgeable on their basic industrial rights. In the absence of basic awareness and lack of industry acculturation, the TWU would recommend that both taxis and rideshare workers (with respect to the NSW Government's currently standing commitment) be subject to minimum training standards and union inductions, to build a skilled labour environment in these sectors. To achieve this, the NSW Government should engage the TWU and other key stakeholders on developing a framework for training and inductions.
- 4.13 The TWU's perspective has never been to delegitimise rideshare platforms as a mode of engagement for workers, but rather, ensure that the space is subject to proper industrial rights and minimum standards. The TWU believes in creating safe, sustainable and viable working environments, and would like to see such outcomes in the point to point transport market – something that can only be achieved with a level playing field.

5. Competition in the rank and hail market

¹ Minister for Industrial Relations. 2024. Overdue protections for gig workers as NSW Government updates industrial safeguards. *NSW Government*.



- 5.1 Assessing competition in the rank and hail market must include consideration of rideshare. The TWU would refer to the aforementioned points discussed in this submission.
- 5.2 Internally, rank and hail services are a challenging and uncertain environment for taxi drivers. There is never a guarantee on patronage, and the nature of competition can, to some extent, be random – hence why, as raised previously, taxi drivers can never be certain to what their earnings will be on any given day or night. Though, there is a degree of sensitivity to location, such as densely populated metropolitan areas like the Sydney CBD enjoying more stable patronage compared to other regions. Inversely, areas like outer Western Sydney do not possess comfort in the security of knowing there will always be a patron.
- 5.3 Additionally, there is currently a reported shortage of taxi drivers². In practice, this means that the ability to provide taxis during peak is limited by the availability of taxi drivers – that of vehicles is not the issue. The industry facing a driver shortage is unsurprising, considering the remuneration of drivers, uncertainty in operating, and uncompetitive nature of traditional point to point transport in comparison to rideshare. Inconsistency in patronage, and the subsequent powerlessness of any individual driver, also serves to further highlight the flaws in the invariable connection between driver remuneration and fares.
- 5.4 A long-standing issue in the taxi space is that of transient employment. Many drivers in the industry are not vocational and adopt practices that can be considered questionable in a short-term mentality. There is a difference in creed between long-time drivers who are acculturated to NSW's taxi industry, and those who are not, and do not intend to pursue point to point transport as a genuine career.
- 5.5 Unacculturated drivers in the industry will undertake shady practices, such as taking longer routes than necessary, turning off the meter, applying fake additional fees, and more. In the TWU's experience, these cases give the entire industry a bad name, as public perception shifts to an unfavourable view of taxis. While these practices degenerate the industry and foster negative views towards it, honest practitioners are left the true victims.
- 5.6 It is by no means acceptable that there are drivers engaging in this behaviour. However, rather than solely looking at the "what", the "why" must also be examined. The underlying influence behind many of these practices is economic insecurity tied to fares, which in context, has an undeniable influence on road safety outcomes. Aside from lack of vocation and industry acculturation, the remuneration system for taxi drivers is a factor that significantly contributes to on-road behaviour, and what can otherwise be described as dodgy practices – such as taking longer routes than necessary and charging unrealistic fees.
- 5.7 It is increasingly difficult for vocational drivers to remain in the industry with the facilitation of temporary, inexperienced drivers who are unacculturated to the standards expected within point to point transport, as well as to their obligations to passengers, networks and even other road users. This can only lead to increasingly negative outcomes for passengers unless vocational drivers are attracted to and retained within the industry.

² Point to Point Transport Commissioner. 2023. Annual Review 2022 – 23. *NSW Government*.



6. Differences between rank and hail services and booked services

- 6.1 A primary difference between rank and hail services and booked services is the matter of safety. Simply put, a taxi driver does not know who they will pick up and welcome into their vehicle with a rank and hail service. With rank and hail, the ability or intention of a passenger to actually fulfil their requirements in paying the fare also remains unknown.
- 6.2 Though unglamorous it may be, the harsh reality is that fare evasion in transport is typically associated with a degree of aggression. Historically, forms of aggression varying between rude gestures, raised voices, and threats, all the way to physical violence, have had a relationship with fare evasion and other misdeeds in the taxi space³. Today, this still rings true, and fare evasion continues to be an area of driver dissatisfaction.
- 6.3 Cases of aggression are present in other transport sectors, such as buses, where drivers still experience a concerning degree of passenger incivility and violence. However, there is a key difference when comparing these two modes of transport – a “full-size” or “standard” metropolitan bus will typically have an occupant capacity exceeding 60 passengers, through any combination of seating and standing arrangements – with some going well beyond.
- 6.4 In contrast, a taxi is typically a standard passenger vehicle, where it is common for there to be merely one passenger. It is no exaggeration to say that a driver may be “trapped” with a passenger, considering the type of vehicle they are in, and the context behind the vehicle’s capacity and operation. As such, while there is never a guarantee for the identity of “who” a driver will be picking up, regardless of if the service is rank and hail or booked, ultimately, there is a higher degree of uncertainty present in the former, particularly in regard to the fare obligations of the prospective passenger.
- 6.5 Pre-booked services, however, still present safety risks and uncertainty. [REDACTED], TWU member and taxi driver of over 10 years, shares his lived experience.

“In 2021, I was shot on the job in Riverstone while carrying a single passenger in a taxi. It was a pre-booked service, but little did I know that my passenger was a Rebels Bikie member. We were followed by another vehicle for some time, and eventually, when we had to come to a stop, a man exited the vehicle and released a spray of bullets into the taxi.

That was a targeted attack on my passenger. However, I was struck by a stray bullet – struck just beneath my left-side ribs. Afterwards, I had to drive both myself and my passenger, who had also suffered shots, to Hawkesbury Hospital in Windsor. That incident left me with PTSD, that I have been receiving much-needed counselling for. It is excellent counselling, but due to the cost of living and earnings I take home, I debate whether I can continue my visits.”

- 6.6 Further, [REDACTED] also provides his perspective on rank and hail as a vocational taxi driver.

“Rank and hail work for taxi drivers is problematic with viability and safety; it can lead to long periods of unpaid time waiting for customers to use the rank. Rank and hail can increase fuel

³ Swanton, B. and Scandia, A. (1990). ‘There’s a little bit of aggression in all of us’: Aggressive Behaviour by Taxi Passengers. *Australian Institute of Criminology*.



costs if drivers seek out hails and the passengers can present an unknown risk of violence, abuse and unwillingness to pay their fare. These risks can be higher in outer suburban and regional areas.”

- 6.7 Generally, there is a lack of respect for drivers conducting passenger transport tasks. This is not exclusive to taxis, and as mentioned, manifests in other areas of passenger transportation, such as buses. It is undeniable that lack of respect and broader public perception contribute to the aggression and violence that taxi drivers may face.
- 6.8 Due to economic insecurity, simply refusing aggressive passengers is not a realistic option for many taxi drivers. It is common for them to take such risks in order to collect as many fares as they possibly can. Under such circumstances, it is reasonable to say that the link between remuneration and fares can in fact influence safety outcomes in relation to passenger incivility as well, and sometimes comes down to taxi drivers having no other choice from an economic perspective.
- 6.9 The connection between remuneration and fares is rooted in the pay structure of bailee taxi drivers. The only reasonable way to change this is to review the payment methods a bailee may select under the *Taxi Industry (Contract Drivers) Contract Determination, 1984*. Realistically, to sever the connection between pay and fares, a method different to Commission and Set Pay-in would be required – one that doesn't involve the driver directly taking either a percentage, or whole sum, of a fare. However, no sustainable changes can be made without regulating rideshare, as operators would likely be incapable of absorbing the cost of remunerating bailee drivers faced with unregulated competition.
- 6.10 The TWU raises that the philosophy behind remuneration for bailee taxi drivers should be centered on safety, sustainability and viability.

7. Service, cost and price changes since the 2017 regulatory framework

- 7.1 Since the introduction of the 2017 regulatory framework, costs have increased across the board – however, these cost increases are also attributable to other factors, especially the COVID-19 pandemic and its domino effect on the economy and various industries.
- 7.2 The cost of taxi operation has compounded by virtue of increased compulsory network fees for operators, as has the cost of insurance, parts, maintenance, and all aspects of running a vehicle. The conduct of drivers is also influenced, and the TWU would again refer to the aforementioned points discussing driver behaviour and economic factors.

8. Current fare levels

- 8.1 Functionally, current fare levels are too low from the perspective of vocational taxi drivers, as they do not align with the cost of living, and do not facilitate loyalty to the industry and occupation. As raised, this is a key contributing factor to the levels of transient employment within traditional point to point transport, and also ultimately contributes to the decline of service quality.



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- 8.2 From the perspective of consumers, the opposite is true, where they do not see the justification of fares due to the decline of service quality, as well as alternative options in the form of rideshare platforms. Non vocational drivers who engage in bad practice further stigmatise the subject of taxi fares, as the charging of non-existent fare prices, as well as questionable on-road routing, leaves consumers with the impression that such fares and behaviour are standard. However, these conclusions are based on inaccurate, bad faith practices that do not reflect the official operating requirements of taxis.
- 8.3 The TWU cautions that perceptions based on improper bad faith practices should not tarnish the efforts of the NSW Government, nor should they sour the goodwill between Government and vocational workers in point to point transport.
- 8.4 Since the last nominal fare increase in 2014, annualised inflation has grown by approximately 26.7 per cent (by calendar year 2023)⁴. Current remuneration methods for bailee taxi drivers are inadequate and archaic, as explained previously. Bailee taxi drivers receive no paid leave, no superannuation or penalty rates and often work unsociable hours in dangerous conditions, having to negotiate the parlous state of NSW roads and traffic. The average income for taxi drivers according to the Australian Taxation Office (ATO) for the 2019 financial year was \$29,262⁵ – and given the lack of official fare increases, the economic reality for current bailee drivers would remain the same.
- 8.5 This means that many bailee taxi drivers are working full-time jobs for below the Australian minimum wage for 2024 – that being \$915.90 based on a week of 38 ordinary hours⁶. The hours are long, the risks are many, and the rewards are few – it is no wonder why there is an increasingly large absence of vocation in traditional point-to-point transport.
- 8.6 Notably, other jurisdictions have recognised the need for an increase, even if it is a short-term solution. In Western Australia, taxi fares hadn't increased since 2014, up until 2021. As of 2021, the following increases have occurred.
- 2021 – a 6.5 per cent increase, representing the percentage CPI increase since 2014 in the Perth transport basket of goods⁷.
 - 2022 – an interim 2 per cent increase (to ease costs of rising fuel prices), effective 1 August 2022. This was followed by a further 9.18 per cent (initially meant to be 4.5 per cent) increase from 1 December 2022⁸.
 - 2024 – A 4.59 per cent increase was approved, effective 3 May 2024⁹.

⁴ Reserve Bank of Australia. Inflation Calculator. <https://www.rba.gov.au/calculator/>

⁵ Taxation statistics – 2018 -19 Individuals: Average and median taxable income, salary or wages, and total income, by occupation and sex, 2018 – 19 income year. Australian Taxation Office. *Australian Government*.

⁶ Fair Work Commission. (2024). *The national minimum wage | Fair Work Commission*. [online] Available at: <https://www.fwc.gov.au/agreements-awards/minimum-wages-and-conditions/national-minimum-wage>.

⁷ KPMG. (2022). Review of Regulated Maximum Taxi Fares. Final Report. *KPMG.com.au*.

⁸ Department of Transport. (2022). *Further increases to maximum metered taxi fares from 1 December 2022*. [online] Wa.gov.au. Available at: https://www.transport.wa.gov.au/aboutus/news-item_48664.asp

⁹ Department of Transport. (2024). *On-demand rank or hail (taxi) fares*. [online] Wa.gov.au. Available at: <https://www.transport.wa.gov.au/On-demandTransport/on-demand-rank-or-hail-taxi-fares.asp>



- 8.7 In 2024, Victoria has also decided to increase the maximum unbooked taxi fares by 5.5 per cent, except for the high occupancy fees and charges, which will increase by 6.2 per cent, in line with the change in Victorian taxi cost indexes¹⁰.
- 8.8 For long-term sustainability of traditional point-to-point transport, the NSW Government will need to look at the bigger picture and address the issue of rideshare being unregulated. However, in the interim, bailee taxi drivers do need relief, and cannot be expected to continue working in such a cumbersome environment that does not give equitable remuneration or incentives to practice.
- 8.9 With the ability to manipulate their own prices, rideshare platforms may become an increasingly attractive option for consumers who otherwise prefer taxis. Ultimately, the TWU supports an increase in rank and hail fares, but would again advise that an increase can only be treated as a short-term solution, with respect to the regulation of rideshare.

9. Approach to setting maximum fares for rank and hail services

- 9.1 The complete absence of a rank and hail fare increase in 10 years, accompanied by the lack of actual economic relief for bailee taxi drivers indicates that action is needed. At this time, the NSW Government should reflect on the decisions of other Australian jurisdictions in point to point transport.
- 9.2 The TWU recommends that indexation be considered by the NSW Government as the interim approach to increasing rank and hail fares, and by extension, providing bailee taxi drivers with much-needed economic relief. However, the TWU would again raise that increases must be treated as a short-term solution, with the intention to regulate rideshare as mode of transportation.

10. Fare Zones

- 10.1 The cost pressures on bailee taxi drivers in regional (country) areas require a higher tariff than metropolitan areas, as in comparison to typical metropolitan areas, demand is more dynamic and extended journeys are offset by longer, unpaid returns. A reintroduction of the return fare for longer journeys between regional towns would be appropriate, as would a higher kilometre rate staggered in increments depending on upon the length of journey, with the more kilometres travelled, the higher the corresponding fare tariff.

11. Wheelchair Accessible Taxi Services

- 11.1 WATS are experiencing the same lack of drivers as the wider industry. This shortage is compounded by the absence of other rideshare operators into a sector of the industry that is vital to the needs of a diverse and dispersed population of people. The vulnerable

¹⁰ Essential Services Commission. (2024). *Unbooked taxi fare and non-cash payment surcharge review 2024*. [online] Available at: <https://www.esc.vic.gov.au/transport/commercial-passenger-vehicles/unbooked-taxi-fares-and-non-cash-payment-surcharge-review-2024>



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demographic of consumers who require access to the same social amenity as others is compromised by an absence of available transport services.

- 11.2 WATS are often provided to people who are eligible for the Taxi Transport Subsidy Scheme (TTSS). While booked services have been deregulated, this is not the case for journeys conducted under TTSS. Like rank and hail, TTSS jobs must be completed with the meter running and by the most direct route. The TTSS pays the driver \$16.50 per chair loaded, however, loading can involve long waiting times and the need to provide a dignified service for vulnerable people.
- 11.3 In Victoria, WATS drivers receive a lifting fee for wheelchairs and mobility scooters of \$30.00 per lift. Additionally, there is a \$12.20 partial lifting fee for conventional taxis loading wheelchairs and mobility scooters. Both of these fees are indexed. The contrast between NSW and Victoria's loading fees for WATS further highlights the inequity faced by NSW bailee taxi drivers, and the TWU recommends the NSW Government considers raising loading fees for WATS in NSW, in line with Victoria.

12. Conclusion

- 12.1 The TWU would like to thank IPART, and by extension, the NSW Government for the opportunity to complete this submission.
- 12.2 Following a decade of economic inaction, this review is a necessary step forward in advancing the lives of workers in point to point transport. However, the TWU believes that meaningful change in the point to point transport industry cannot be achieved by addressing rank and hail taxi services in isolation - the NSW Government must also focus on regulating rideshare as a mode of transport.