

FARE CONCESSIONS: BEING FAIR MAY HAVE UNFAIR CONSEQUENCES

The primary focus of this submission is fare concessions available to seniors -- in particular the proposal – at 2.8.3 -- that eligibility for the Gold-Opal [GOC] card be restricted to seniors that are also age-pensioners and, conversely, otherwise denied to self-funded retirees.

The principal suggestion in this submission, possibly for those responding to the final report, is to keep a universal, age-based entitlement to a Gold Opal Card to minimise the risk of aged people choosing to drive instead of riding public transport.

I will not be offended if IPART does not amend a draft report meeting different objectives – one possibility, however, may be to retain, at a higher age of entitlement, universal access to a Gold Opal Card with a low daily cap.

Indeed, keeping the Gold-card cap at the current \$2.50 may be respected nationally.

- **preamble**

One thing I am not sure about is whether the brief, for IPART reviewing transport fares, directly accommodates regard for a broader range of related considerations or, alternatively, requires a narrow focus there while leaving open the door to a broader policy debate.

Skipping around the report and supplementary material shows a bit of both but it is not clear how some important related issues have been accommodated in the conclusions drawn in the report.

- **fairness**

Fairness is one sensibly recurrent theme of a report on public transport fares -- especially about entitlements to concessions, including to seniors.

There is much that is unfair, on a broad front, about concessions available to seniors but seniors generally being universally entitled to the GOC is, on balance, one of the less offensive [age-pension-card filtering of entitlements may be common enough but it often compounds other inequities – not least to pension-taking owners of expensive, means-test-exempt, metropolitan housing assets.]

It would be unfortunate also if seniors in regional areas, no longer entitled to a GOC, are to be additionally penalized for starting long journeys in ‘peak time’ that end well past any peak by the time they arrive in Sydney or another regional centre.

[Just lingering on ‘fairness’ matters momentarily: registered, unemployed job-seekers should surely enjoy generous assistance when travelling to job interviews et al: the risk of free-riding may be minimal if these registered job-seekers were entitled to a GOC allowing, say, 2 trips each week (as well as another opal concession card).]

- **unintended consequences**

Imposing a \$9 cap on self-funded retirees will see more aged drivers newly using their car instead of taking public transport -- not only does \$9 probably exceed the (miss)perceived marginal cost (petrol) of local travel but driving has other attractions including convenience, comfort and time saved.

Paying 'half-full-fare' may still be attractive for some local trips but, if the capped daily base for reckoning opal-card costs is to be \$9, the inclination to substitute driving for riding would readily embrace return journeys of 60km+ for singles and 120 km+ for couples.

There will be unintended consequences when the aged substitute driving for riding – one, for certain, is less safe road travel for all.

Pausing for a moment: the concept of unintended consequences has been so pirated by self-serving rent seekers, aided by (never)independent consultant-advisers, as to render such claims almost always offensively fraudulent in any public policy discussion. I may similarly offend – be warned.

Whatever, the objective basis of my concern is evidence that drivers aged over 75 are more likely to be involved in accidents – being injured and killed themselves, and others similarly.

Cursorily googling the association of old-age and driving safety, threw up predictably plausible stuff – a couple of extracts follow. Better connected expert commentators will present better national and international evidence.

Drivers aged 75 years or over have a higher risk (per distance travelled) of being killed in a crash than any other age group. As we age our bodies become more fragile and drivers in this age group, are more likely to be hurt or killed in a crash. Many older people are perfectly capable of driving safely, yet physical and mental changes that often come with ageing can affect how well older people drive --- slower reaction times: loss of clarity in vision and hearing: loss of muscle strength and flexibility : use of prescription drugs which may cause drowsiness.

..... a senior citizen is more likely than a younger driver to be at fault in an accident in which they are involved.....the most common violations include failure to obey traffic signals, unsafe turns and passing, and failure to yield the right of way

Whatever, my expectation is that denying the GOC concession to self-funded, aged retirees will see an unwelcome substitution of travel by car – an unintended, and unwelcome, increase in road accidents involving aged drivers (and otherwise innocent third parties).

Please, do not do this.

Adverse consequences for road safety will be measurable: it is disturbing to see the predictability in metropolitan road accidents disaggregated by time-of-day, day-of-the-week and locations -- only the names are not available in advance now and, as proposed, neither will be the names to be added.

The community interest is best served if aged people ride instead of drive -- don't discourage that.

Peter Mair

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