

30 March 2009

Secretariat

National Transport Commission

Department of Infrastructure, Transport, Regional Development and Local Government

Via email: [ntc\\_review@infrastructure.gov.au](mailto:ntc_review@infrastructure.gov.au)

The Bus Industry Confederation (BIC) represents bus and coach operators and the bus and coach manufacturing sector in Australia.

This includes a majority of bus and coach service providers, (route, school, charter, tour and express) and includes a number of Government owned entities.

### **THE BIG ISSUES – WHAT ARE THE BIG CHANGES REQUIRED?**

The big issues for the Australian transport system are clearly about addressing:

- Urban congestion
- Climate change
- Efficient freight movement
- Road safety
- Social exclusion and isolation
- Depleting oil resources

BIC has included with this submission the Industry response to the Senate Inquiry into the Investment of Commonwealth and State funds in Public Passenger Transport, Infrastructure and Services.

It is clear that Australia lacks a comprehensive national transport strategy policy framework that focuses on “how Australia moves people”.

The regulatory and policy focus has for the past decade or more been nearly solely focused on freight and the economy, at the national level.

‘Moving People’ policies have largely been the domain of States and has seen public transport delivered on a State by State basis with little focus on the national outcomes being sought to improve our cities, environment, living standards and most importantly the level of access to mobility and passenger services that an Australian citizen should be entitled to, no matter where they live or their circumstances.

If anything there has been a complete policy vacuum at a national level with regard to passenger transport issues. The biggest offender in this neglect has been the Federal Department of Infrastructure, Transport, Regional Development and Local Government (DITRD LG) which has shown no interest in passenger transport except in the area of road safety.

At the same time the NTC has had no capacity due to its organizational Charter to develop work programs in this area.

The greatest challenges or biggest issues facing the transport industry in Australia revolve around personal mobility and passenger transport. This is because they have been neglected for so long at a national level, or addressed in a “silo” approach rather than in a holistic transport policy sense between the Commonwealth, States, Territories and Local Government.

The big change required is greater Commonwealth Government involvement in passenger and public transport. The Federal Department of Infrastructure, Transport, Regional Development and Local Government (DITRD LG) has a strategic role and responsibility, in co-ordination with other Federal departments, e.g.: Climate Change and the NTC, to see the development of a Commonwealth ‘Moving People’ strategy become a reality.

This strategy should be developed taking into account existing travel and transport programs run by other Commonwealth Departments such as Travel Smart (Environment), Community Transport (HACC – Health), Veterans Affairs, and Indigenous Affairs.

The NTC’s role and charter should be expanded to include through Intergovernmental Agreement a ‘policy development’ and implementation role to address personal mobility and passenger transport within the National Transport Plan and Policy Framework.

This should include links to Infrastructure Australia and the Major Cities Unit and any other relevant Commonwealth Departments as signatories e.g. the Department of Climate Change.

The key transport challenges outlined at the beginning of this submission are national issues and not just the domain of the Commonwealth.

The NTC has a clear consultation role to undertake with the Commonwealth, States and Local Government. The NTC can provide as a Commission a long term policy outlook and undertake the required consultation without the constraints of a Department.

As part of the Intergovernmental Agreement on passenger transport the NTC should, as part of renewed institutional arrangements be provided strategic advice from a National Transport Policy Advisory Group.

## **THE PERFORMANCE OF THE NTC**

Overall the NTC has performed well in what have been at times been difficult circumstances due to State Government differences on issues and on occasions lack of commitment to the Intergovernmental Agreement and NTC processes.

The NTC consultation process is the biggest challenge and hurdle. State jurisdictions may attend NTC consultation workshops and forums, but often the communication within a jurisdiction both internally and externally has been inadequate. This has resulted in national positions or “model legislation” being agreed that is not even supported within jurisdictions let alone between States.

This dysfunctional process is the result, in BIC’s view, of a waning in commitment to the NTC process by Jurisdictions and their representatives. Internal consultation mechanisms within a State to ensure that all relevant sections within a Department, between other relevant Departments and State Industry bodies do not seem to be taking place effectively, if at all.

The outcome of ATC votes on NTC matters would indicate that Ministers on occasions vote on issues, thinking it agreed, and then are subject to criticism from stakeholders in their own States and even their own State government entities for lack of consultation.

The NTC is then often made, unfairly, the “whipping boy” of State Authorities.

There is a real need to formalize how NTC consultations should be undertaken and agreed by the States. If such a protocol exists already, a recommitment to it and the NTC process by State and Territory Jurisdictions is required.

A further issue for review is the disconnect that exists between COAG, ATC and NTC. There is a need to investigate how the outcomes that COAG seeks become reality and are tangible as issues make there way from COAG to ATC to NTC and Individual States.

An example is the work by COAG in the area of urban congestion. This work after being passed on to the ATC has resulted in very little if any ‘cut through’ in a national transport policy sense. This is because no strategic “national” transport policy body existed to progress it to the next logical policy level and individual states were/are reluctant to progress urban congestion policy solutions on an individual basis. In fact, some projects may have been adopted by States as a project to “kill it”?

## **DEALING WITH THE NTC**

The BIC has had a long standing good working relationship with the NTC at an officer level and with Commissioners. This has allowed for the Bus Industry to convey its frustrations in relation to the lack of

focus on bus specific issues and more importantly the need to address bus issues separately from truck issues.

The BIC has been able to establish a small specific work program for the bus industry through this relationship but progress has been slow as a result of other NTC priorities and lack of State Government “buy in” to specific bus related regulatory issues, e.g. – national accreditation.

The Industry seeks a distinct separation of bus and truck when addressing heavy vehicle regulatory reform and within any future NTC role that might emerge as part of this Review.

There is a clear need for this differential in the future to avoid the problems of the “one size fits all” approach for heavy vehicles of the past. This differentiation will deliver better outcomes between freight and passenger transport within the definition of heavy vehicles. To base the definition of heavy vehicles on mass and not the task is untenable if Australia’s future transport challenges related to personal mobility are to be addressed.

BIC is happy to respond to any queries about this submission and apologises to the Secretariat for its late submission

Kind Regards

Michael Apps  
Executive Director  
Bus Industry confederation