

Group Submission: Feedback from South Australian Rideshare Drivers on the Passenger Transport Act Review, October 2024

https://www.dit.sa.gov.au/point_to_point_transport/industry.

Dear Nick and DIT Senior Officers attending,

Thank you for inviting me, and five others from the Adelaide Rideshare Drivers Facebook Group to tomorrow's meeting with the Department for Infrastructure and Transport (DIT) on Monday, 28 October 2024. This meeting signifies the DIT's commitment to collaborating with industry stakeholders to implement changes to the Passenger Transport Act 1997.

I would like to highlight several points regarding our previous communications:

- **19 May 2024:** I sent an email to two Adelaide City Councillors, the Premier, and the MPs responsible for transport, outlining the ongoing challenges that rideshare drivers face in the Adelaide CBD both day and night. You can view this correspondence [adelaide-city-council](#).
- **13 June 2024:** I provided feedback on the Hindley Street Revitalisation, which was also cc'd to the Transport Minister. More information can be found in [hindley-street](#).
- **18 September 2024:** I submitted a group witness submission (Inquiry into the Digital Transformation of Workplaces - Submission 65), with the Federal Government - House Standing Committee on Employment, Education and Training which can be accessed via [federal-government](#).
- **28 October 2024:** Meeting with Department for Infrastructure and Transport: [DIT](#).

These submissions represent the collective voice of South Australian rideshare drivers, primarily members of the "Adelaide Rideshare Drivers Group" (including Uber, Didi, Ola, etc.) on Facebook, which has 3,805 members as of 25 October 2024, including the Transport Minister Tom Koutsantonis. It is important to note that some taxi drivers (either past or present) and MV plate holders are also members of this group and have contributed feedback.

It has been noted that after the consultation period ended, we received an email to discuss how the review would be implemented. I believe we should have been notified and consulted during the review creation process.

It should also be noted that we have also had discussions with Holdfast Bay Council which occurred on 26 June 2024 as documented in [city-of-holdfast-bay](#).

As I have requested the agenda and the names of the DIT attendees but have not received this information, I kindly ask that a copy of this meetings minutes be sent to us for approval as we plan to send them to

- Mr James Stevens MP,

- the House of Representatives Standing Committee on Employment, Education, and Training
- Mr Ben Hood MP and
- Members of our facebook group

since we have been keeping them all informed about this matter.

In the absence of an agenda, we have prepared a document outlining our responses to each recommendation. The following table highlights each recommendation and indicates in red which six are most important to us. So that we are all on the same page, it would also be a good idea if all people attending the meeting view this video, <https://youtu.be/Q-FnGsZDNio?si=5VTMIIGHIFVgBuD2> (Adelaide Rideshare driver guidelines as at 15 August 2024 & why we need them. Info from MMM & ABC), which provides comprehensive insights and is structured as follows:

1. Channel 9 News NSW: 0:00 to 1 minute :10 seconds
2. ABC Radio Morning Show (7 August): 1:15 to 9:20
3. ABC Radio Afternoon Show (7 August): 9:30 to 17:45
4. Advertiser Article (7 August 2024)
5. Adelaide City Council Vehicle Compliance Technology Video: 18:00 to 21:00
6. MMM Radio: 21:00 to 27:00
7. Submission to the House of Reps Standing Committee (9 August): 27:00 to end

For optimal viewing, we recommend watching the video on a computer with sound enabled. It features contributions from over 30 rideshare drivers who are active in our Facebook group.

In our upcoming meeting, we hope to review the key recommendations. Given the range of issues, though, we anticipate a follow-up meeting may be necessary, as one hour might not suffice. Our ask is straightforward: to see fair and practical solutions implemented, such as Brisbane's 2-minute loading zones, rather than relying on additional cameras, fines, and inaction, which can compromise public safety.

While the establishment of dedicated Pick-Up and Drop-Off (PUDO) zones is under consideration, we urge the introduction of a straightforward bill in Parliament, if needed, to permit rideshare drivers to use taxi ranks for pick-ups and drop-offs without fear of fines or harassment. This measure would not only improve public safety and streamline transportation across Adelaide but also ensure a more welcoming and visitor-friendly city. Imagine the confusion of a visitor unable to be dropped off at a city taxi rank—it would highlight a gap in Adelaide's visitor experience and suggest missed opportunities in the State's planning for modern, accessible transport solutions.

Thank you for your attention to these matters.

Neil de Souza

Recommendation	Agree/disagree with recommendation (average response)
RECOMMENDATION 1: Change how Access Taxi services are delivered.	Neutral/Don't care
RECOMMENDATION 2: Stronger compliance and enforcement powers to address safety issues and fraudulent behaviour.	Strongly disagree
RECOMMENDATION 3: Address structural issues in the metropolitan taxi industry by removing the limit on the number of taxi licences.	Neutral/Don't care
RECOMMENDATION 4: Deliver a Taxi Industry Reform Package	Disagree
RECOMMENDATION 5: Remove barriers for service delivery in regional South Australia and city fringe areas.	Agree
RECOMMENDATION 6: Introduce a simpler accreditation model to remove duplication, enable effective regulation and better respond to new and emerging business models.	Agree
RECOMMENDATION 7: Taxi fares continue to be subject to annual indexation	Neutral/Don't care
RECOMMENDATION 8: Surge pricing safeguards to protect consumers in emergency Situations.	Disagree
RECOMMENDATION 9: Responsive pricing set by the Minister.	Neutral/Don't care
RECOMMENDATION 10: New sanctions for unauthorised use of EFTPOS and meters	Agree
RECOMMENDATION 11: Introduce a General Safety Duty and Chain of Responsibility.	Neutral/Don't care
RECOMMENDATION 12: Safety focused vehicle identification requirements	Strongly disagree
RECOMMENDATION 13: Maintain vehicle age limits to ensure safety, with some changes.	Agree
RECOMMENDATION 14: Introduce consistent vehicle inspection requirements	Neutral/Don't care

RECOMMENDATION 15: Remove unnecessary vehicle requirements	Neutral/Don't care
RECOMMENDATION 16: Remove engine capacity requirements	Neutral/Don't care
RECOMMENDATION 17 Enable point-to-point vehicles to have less than four doors	Disagree
RECOMMENDATION 18: Enable left hand drive vehicles in the industry	Disagree
RECOMMENDATION 19: Require cameras in all point-to-point vehicles	Disagree
RECOMMENDATION 20: Remove regulatory uniform requirements	Agree
RECOMMENDATION 21: Further consider guidelines and industry standards related to driver safety.	Agree
RECOMMENDATION 22: Provide a framework for more on vehicle advertising	Neutral/Don't care
RECOMMENDATION 23: Investigate implementation of safe drop off and pick up zones in high traffic areas	Strongly agree
RECOMMENDATION 24: Enforce greater compliance at taxi ranks and vehicles 'plying for hire' in contravention of conditions.	Strongly disagree
RECOMMENDATION 25: Review data management, collection and sharing requirements	Disagree
RECOMMENDATION 26: Moving to a greener and more accessible fleet	Disagree
RECOMMENDATION 27: Investigate options for implementing sector wide driver training to improve service delivery and passenger safety standards	Agree
RECOMMENDATION 28: Maintain current driver's licence tenure requirements	Neutral/Don't care
RECOMMENDATION 29: Ensure we future proof the regulatory arrangements for the point-to-point industry regulatory arrangements for the point-to-point industry	Agree

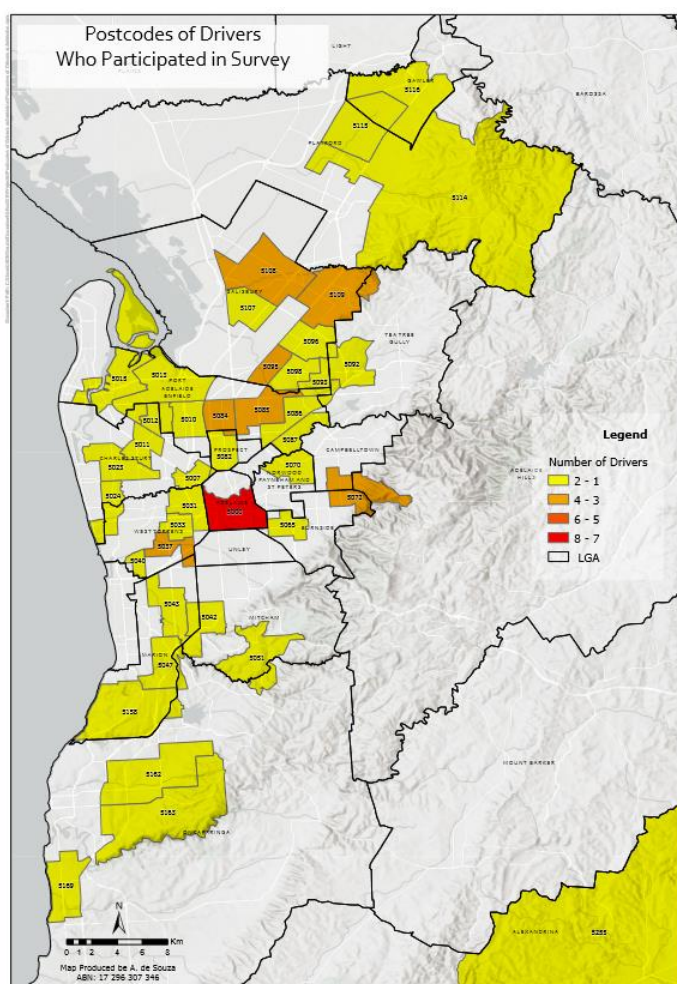
Introduction

Our group conducted a feedback survey from 2 to 8 September 2024, engaging primarily with 80 rideshare drivers in Adelaide, most of whom are unaffiliated with any union. While the majority of participants were rideshare drivers, it is likely that some taxi drivers and MV plate holders also contributed. Among the 80 respondents, 77 identified as male and 3 as female. Approximately half of the group was actively seeking full-time or part-time employment, while the other half were not.

In order to prepare for this meeting, we ran a more targeted survey from Monday 21 to Wednesday 25 October 2024, focusing on all recommendations of the review. Of the original 80 participants, 10 provided detailed input in this follow-up survey. It should be noted that not all meeting attendees completed the surveys, and the survey data has been anonymized for confidentiality.

The original survey results can be found in Appendix A: General Driver Responses from 80 Participants (as of 7 September 2024) submitted to the [federal-government](#).

The map below highlights the geographical distribution of these drivers across Adelaide and further insights into the respondents are in Appendix A of the above link.



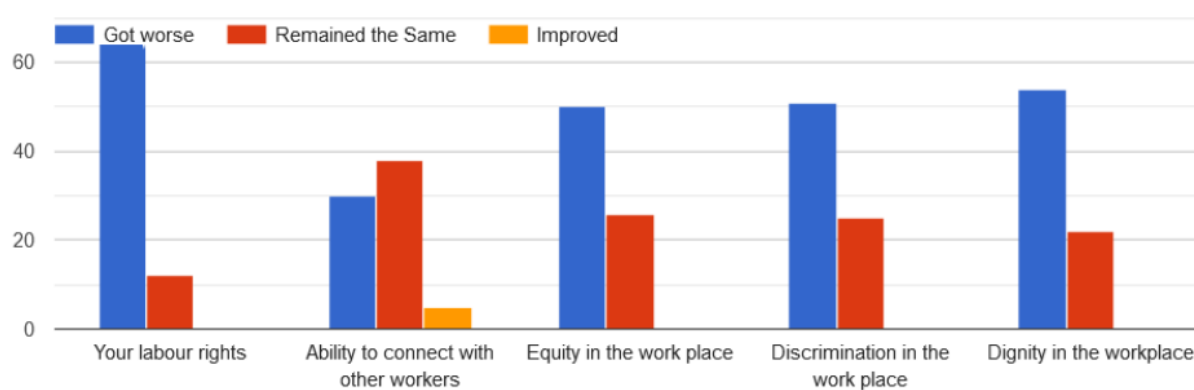
Postcodes	Sum
5000 - Adelaide - eg ADELAIDE	8
5007 - Western Adelaide - eg BOWDEN	2
5010 - Western Adelaide - eg ANGLE PARK	1
5011 - Western Adelaide - eg WOODVILLE	2
5012 - Western Adelaide - eg ATHOL PARK	2
5013 - Western Adelaide - eg OTTOWAY	1
5015 - Western Adelaide - eg PORT ADELAIDE	1
5023 - Western Adelaide - eg FINDON	1
5024 - Western Adelaide - eg WEST BEACH	1
5031 - Western Adelaide - eg MILE END	1
5033 - Western Adelaide - eg COWANDILLA	1
5037 - Western Adelaide - eg NORTHPLYMPTON	3
5040 - Western Adelaide - eg NOVARS GARDENS	1
5042 - Southern Adelaide - eg TONSLEY	2
5043 - Southern Adelaide - eg ASCOT PARK	2
5047 - Southern Adelaide - eg DARLINGTON	1
5051 - Southern Adelaide - eg BLACKWOOD	1
5065 - Eastern Adelaide - eg TUSMORE	1
5070 - Eastern Adelaide - eg PAYNEHAM SOUTH	1
5072 - Eastern Adelaide - eg SKYE	3
5082 - Eastern Adelaide - eg FITZROY	1
5084 - Northern Adelaide - eg BLAIR ATHOL	4
5085 - Northern Adelaide - eg NORTHGATE	3
5086 - Northern Adelaide - eg GILLES PLAINS	2
5087 - Northern Adelaide - eg WINDSOR GARDENS	2
5092 - Northern Adelaide - eg MODBURY NORTH	1
5093 - Northern Adelaide - eg PARA VISTA	2
5095 - Northern Adelaide - eg MAWSON LAKES	3
5096 - Northern Adelaide - eg PARA HILLS WEST	2
5098 - Northern Adelaide - eg WALKLEY HEIGHTS	2
5107 - Northern Adelaide - eg PARAFIELD GARDEN	2
5108 - Northern Adelaide - eg PARALOWIE	3
5109 - Northern Adelaide - eg SALISBURY PLAIN	3
5114 - Northern Adelaide - eg ANDREW'S FARM	2
5115 - Northern Adelaide - eg MUNNO PARA WEST	2
5116 - Barossa, Light and Lower North - eg EVANSTON	1
5158 - Southern Adelaide - eg TROTT PARK	2
5162 - Southern Adelaide - eg MORPHETT VALE	1
5163 - Southern Adelaide - eg ONKAPARINGA HILLS	2
5169 - Southern Adelaide - eg MOANA	2
5255 - Murray and Mallee - eg NALPA	1
5556 - Yorke and Mid North - eg WARBURTO	1
Grand Total	80

Conclusion:

We encourage you to review our detailed responses to each of the 29 recommendations following this conclusion.

The following graph presents a key question from our survey, specifically concerning the new recommendations for rideshare operations. It is evident that most of these recommendations do not align with the views and needs of rideshare drivers, indicating an urgent need for revision.

26. Please rate the following aspects of the rideshare industry in South Australia, particularly in light of the newly proposed reforms.



Our response to *Recommendation 23*, which pertains to the establishment of designated Pick-Up/Drop-Off (PUDO) zones, should be closely examined—particularly the segments relevant to:

1. The report submitted to the Federal Government (page 27)
2. Driver Feedback on PUDO Zones (page 28)
3. Fine data as of September 2024 (page 31)
4. Scenarios for consideration (page 33)

We firmly believe that both the state government and local councils fail to recognize the rideshare industry as a vital and growing sector of the transport economy. Drivers are not merely independent contractors; they are small business owners who make substantial investments in their vehicles and contribute significantly to the economy through both direct and indirect taxes.

As stakeholders, we are deeply concerned that state government practices have been unfairly biased, violating competition laws and favouring the taxi industry through subsidies and other advantages. This preferential treatment is unacceptable, and we insist on a level playing field for all transport providers.

Additionally, we call for transparency in the accountability of levies collected from rideshare drivers. This should include publicly accessible, periodic reports detailing levy allocations, fines, expiation numbers, and other relevant metrics. Clear and accessible reporting is essential for ensuring fairness and building trust across the industry.

Finally, in the last five weeks, I've taken over 20 rides with Uber and Bolt in various countries outside Australia. Through conversations with these drivers, I've observed the following:

1. **Taxi Ranks:** Many drivers are surprised that rideshare drivers in Adelaide are not allowed to drop passengers off at taxi ranks, as this is permitted in other countries.
2. **Flexible Licensing:** Drivers also questioned why Adelaide's taxi drivers cannot use platforms like Uber or Didi alongside their taxi services in their taxis, which is commonly allowed in many places abroad.
3. **Efficient Drop-Offs:** The pickup and drop-off process for rideshare vehicles is notably smoother in other places, where drivers can operate without the constant worry of incurring fines.
4. **Camera Enforcement:** Some cities also use council cars equipped with cameras, but unlike in Adelaide, these cameras don't target rideshare drivers. As shown in the Adelaide City Council video, the AI technology in these systems can distinguish rideshare vehicles—so why are drivers still penalized in Adelaide?

Additionally, there's growing concern over the councils' and governments enforcement practices, particularly as people are increasingly receiving multiple ticketless fines months after the alleged infractions (- page 3 – Advertiser 26 October 2024). This approach seems to impact rideshare drivers, local residents, visitors, and those with mobility challenges disproportionately. What are the guidelines existing for councils to issue fines, especially given the growing trend of the public receiving multiple fines months after the original offense?

Are these practices genuinely improving the quality of life for South Australians and visitors to the state, or are they simply adding an unnecessary financial burden on rideshare drivers and inconveniencing the public, particularly those with mobility challenges?

We urge a fair and balanced approach that encourages a shift in regulatory mindset. Government regulations should empower businesses rather than create obstacles. We believe this feedback can lead to constructive improvements in the current recommendations.

In alignment with your commitment to connect South Australians for a dynamic future, your vision of accessible services and transport, and your mission to build with purpose and care, we respectfully request that you consider this feedback. We hope it will inspire meaningful adjustments to the current recommendations, fostering a regulatory environment that truly meets the needs of all South Australians.

RECOMMENDATION 1: Change how Access Taxi services are delivered

- Agree/disagree with recommendation (average response): Neutral/Don't care

Summary of responses on the recommendation:

1. **Rideshare Model for Disabled Passengers:** Several respondents support allowing rideshare services with appropriate driver training to transport passengers with disabilities, offering customers more choices beyond Access Taxis.
2. **Concerns Over Access Taxis:** Issues with Access Taxis include complaints from disabled passengers and war veterans, with delays and unreliability impacting important events. The deteriorating service raises concerns about the system's effectiveness.
3. **Government-Supported Drivers for the Disabled and Elderly:** One suggestion is to introduce 50 part-time government-subsidized drivers, equipped with disability training and first aid certification. This would cater to elderly and disabled passengers for non-emergency purposes, such as outings and social visits, not just doctor appointments. It is suggested that a dedicated division of trained drivers be established, possibly supported by the NDIS (National Disability Insurance Scheme).
4. **Lack of Designated Pick-Up/Drop-Off (PUDO) Zones:** A consensus highlights the absence of safe PUDO zones for vulnerable passengers such as the elderly and disabled. Drivers face challenges when assisting passengers, especially since more time is required for these individuals to board and disembark, leading to stress and fines in non-compliant areas.
5. **Decline in Taxi Work:** The taxi industry has seen a 50% decline in work, suggesting a need for compromise. Some believe the integration of Access Taxi and rideshare services could create a unified, fair model.
6. **Oversight and Accountability:** There are calls for an independent authority, such as the CBS (Customer Business Support), to take over Access Taxi operations, ensuring vehicles and drivers are available 24/7 to meet the demand.
7. **Shift Towards Rideshare:** Many passengers who previously used Access Taxis have started using rideshare services like Uber and DiDi, citing better GPS accuracy and service reliability. Some drivers have even been asked to provide private rides for disabled passengers.
8. **Driver Impact:** Some rideshare drivers feel these issues indirectly affect them, as the problems within Access Taxis reflect broader service issues that influence their work. The consensus is that disabled passengers deserve a reliable and accessible transport service.

RECOMMENDATION 2: Stronger compliance and enforcement powers to address safety issues and fraudulent behaviour

- Agree/disagree with recommendation (average response): Strongly disagree

Summary of responses on the recommendation:

1. **Inadequate Officer Resources and Equipment:** Drivers highlighted that the current number of compliance officers is insufficient. They also lack proper equipment to enforce regulations effectively, both on and off the road. More officers and better tools are needed for efficient enforcement.
2. **Limited Powers of Compliance Officers:** The limited powers of compliance officers were criticized. It was suggested that undercover officers could work within the rideshare industry to assess compliance, issue on-the-spot fines, and provide continuous updates to the department.
3. **Concerns about Mobile Phone Seizures:** Drivers expressed concerns over potential amendments that allow officers to access information from mobile phones. They questioned how long phones would be held and feared important data might be deleted during investigations. It's also crucial that powers to obtain information from mobile phones be clearly defined to ensure individual privacy is protected, and officers only access relevant activity.
4. **Excessive Penalties Related to Camera Enforcement:** In some states, passengers have been fined over \$400 if seat belts are partially covered by clothing, despite modern vehicles already having seatbelt alarms. Drivers are concerned that similar rigid penalties could be enforced here once the new cameras are operational.
5. **Taxi Rank Drop-Offs and Pickups:** The recommendation to penalize rideshare vehicles for stopping in taxi ranks sparked concerns. **Drivers questioned how to handle drop-offs and pickups at taxi ranks when passengers specifically request these locations.** They suggested that rideshare drivers should be allowed to stop briefly without queuing, as fines for simply doing their jobs are unfair. To ensure balance, rideshare parking and drop-off areas should also be established in busy areas like the Adelaide CBD and Glenelg.
6. **Safety and Fraudulent Behaviour:** Safety concerns are a priority for both drivers and passengers. Rideshare platforms readily suspend or remove drivers if there are safety or fraudulent behaviour concerns. However, there is nothing preventing suspended drivers from simply switching platforms and continuing to work without penalty. It's important for rideshare companies and the Department of Infrastructure and Transport (DIT) to share relevant data so that drivers involved in unsafe or fraudulent activities face penalties across all platforms. This would also help identify drivers without valid Working with Children checks, licenses, or safe vehicles.

7. **Data Sharing Between DIT and Rideshare Companies:** Drivers suggested that rideshare companies and DIT should share data to ensure that penalties for unsafe or fraudulent behaviour are enforced across all platforms. This would help identify drivers who do not have a valid Working with Children check, a driver's license, or a safe vehicle, ensuring safety across the board.
8. **Need for Rideshare Parking/Drop-Off Areas:** Drivers recommended establishing designated rideshare parking and drop-off zones, particularly in busy areas such as the Adelaide CBD and Glenelg, to address the challenges of dropping off and picking up passengers legally and safely.
9. **Outdated Regulations for Rideshare Drivers:** While the taxi industry is governed by long-standing regulations, there has been no equivalent regulation introduced for rideshare services. This leaves rideshare drivers without many of the privileges enjoyed by taxi drivers, leading to confusion and unfair penalties when trying to comply with local and state laws. The situation is further complicated by the fact that these privileges and regulations are controlled by both state and local governments, and there has been little effort to rectify this imbalance.
10. **Local Council Enforcement Using CCTV:** Local councils are increasingly relying on mobile and fixed CCTV to enforce parking regulations. Drivers believe this is unfair, as councils, particularly in Adelaide and Holdfast Bay, have refused to provide any assistance to alleviate the parking issues faced by rideshare drivers. Councils seem content to increase revenue through fines, while offering no practical solutions.
11. **Collaborative Approach Needed:** Drivers emphasized the need for collaboration between state and local governments, the rideshare industry, and rideshare companies to address these issues. They would be more accepting of penalties for stopping in taxi ranks if a fair and collaborative solution, including rideshare-specific parking solutions, could be implemented.
12. **Rideshare drivers being followed/harassed:** Multiple ride share drivers have reported that they have been followed by council cars even at 2am in the morning. What is DIT doing to deal with these sorts of situations?

RECOMMENDATION 3: Address structural issues in the metropolitan taxi industry by removing the limit on the number of taxi licences.

- Agree/disagree with recommendation (average response): Neutral/Don't care

Summary of responses on the recommendation:

1. **Industry Growth and Regulatory Concerns:** One response highlights the growth of point-to-point services in metropolitan Adelaide, with 5,572 small passenger vehicles operating in 2023, up from 4,974 in the previous year. Additionally, 1,035 general taxi licences existed, though not all were in use. The response stresses the importance of including up-to-date figures on small passenger vehicles and taxis in the 2024 review, pointing out the need for regulations to adapt to technological changes while maintaining consumer safety. Can you let us know these up to date figures?
2. **Opposition to Licence Limit Removal:** A concern was raised that increasing the number of taxi licences could lead to decreased compliance and fewer earning opportunities for drivers. They argue that some limit should remain to prevent over-saturation.
3. **Impact on Rideshare:** One respondent emphasizes that while taxis need renewal and restructuring, this should not happen at the expense of rideshare services.
4. **Alternative Proposals:**
 - **Taxi Licence Buyback or Expansion:** Another suggestion involves a possible buyback of taxi licences or extending existing licences to include rideshare drivers. This could allow for better monitoring of drivers by the licence owners and provide permanent part-time opportunities via government schemes.
 - **Licensing for Rideshare:** There is a proposal to sell a licence for up to 50 rideshare drivers to operate in specific industries or areas under permanent contracts.
5. **Concerns about International Students:** One respondent suggests that restrictions should be placed on international students driving for rideshare services, arguing that these students take jobs from locals. They express concern that rising unemployment could leave Australian part-time workers unable to compete with international students who dominate the rideshare market.

RECOMMENDATION 4: Deliver a Taxi Industry Reform Package

- Agree/disagree with recommendation (average response): Disagree

Summary of responses on the recommendation:

This recommendation proposes a Taxi Industry Reform Package that includes a buyback scheme for metropolitan and Access Taxi licences to compensate licence holders. The following key concerns were raised by drivers in their feedback:

1. **Levy and Transparency:** Many respondents voiced concerns about the \$1 levy that has been collected since 2018. They requested clear information on the total funds collected, whether the levy is running at a surplus or deficit, and justification for its continuation. Specific questions were raised about:
 - How long has the \$1 levy been collected, and how much has been raised?
 - What has the money been spent on so far?
 - Once the buyback is complete, where will any surplus funds go? Will rideshare drivers, who are paying the levy, see any benefit?

While there is general support for compensating taxi licence holders, many respondents are wary of the financial impact on rideshare drivers, who already face income challenges.

2. **Audit and Regulation:** Respondents called for stricter auditing of Central Booking Services (CBS) to ensure compliance with regulatory requirements. Specifically, they questioned whether the Department of Infrastructure and Transport (DIT) or the Minister has conducted audits on CBS to verify their adherence to rules, such as maintaining complaint registers.

Suggestions included mandatory quarterly reporting by CBS companies on emergencies, accidents, and serious incidents, as well as an annual audit before licence renewals.

3. **Licence Buyback Concerns:** Some respondents questioned the necessity of the licence buyback itself, suggesting alternative reforms. They proposed that taxi licences be extended to include rideshare services and called for a fairer pay structure for all drivers, such as a minimum hourly wage of \$36 rather than the current commission-based system.

Additionally, there was significant concern that rideshare drivers, who already face income difficulties, are being unfairly burdened by the levy, which benefits taxi drivers more directly.

RECOMMENDATION 5: Remove barriers for service delivery in regional South Australia and city fringe areas.

- Agree/disagree with recommendation (average response): Agree

Summary of responses on the recommendation:

Respondents highlighted the need for more flexible transport options in regional and fringe areas, emphasizing the importance of encouraging new small businesses without excessive red tape. The removal of barriers could expand transport options for residents and tourists in areas like Gawler, the Adelaide Hills, Victor Harbor, and the Barossa Valley. However, respondents pointed out that limited and intermittent demand in these areas discourages rideshare drivers from accepting trips, as there is no compensation for travel time to pick up riders in remote locations. Drivers often prefer to stay in busier areas, like Adelaide's CBD, where demand is more consistent.

Finally, it was suggested that increasing rideshare services throughout the state and allowing drivers flexibility in their operation could better cater to holiday areas during peak periods. It was also noted that improved rideshare access might have prevented recent transport-related fatalities on the South Coast.

RECOMMENDATION 6: Introduce a simpler accreditation model to remove duplication, enable effective regulation and better respond to new and emerging business models.

- Agree/disagree with recommendation (average response): Agree

Summary of responses on the recommendation:

One response suggests dividing the current licencing process into specialized units, such as "Working with Children" or health-related areas, to improve efficiency. The current setup involves all staff handling the same tasks, which lacks differentiation and may reduce efficiency.

There is concern about the potential costs involved in obtaining a CBS (Consumer and Business Services) licence and how it would apply to MV plate vehicles. There is also uncertainty about whether this would restrict operators from referring clients to other companies when they are fully booked.

RECOMMENDATION 7: Taxi fares continue to be subject to annual indexation

- Agree/disagree with recommendation (average response): Agree

Summary of responses on the recommendation:

One respondent suggests that this recommendation appears to benefit taxi drivers exclusively while negatively impacting rideshare drivers.

While they support the indexation of taxi fares, as it helps employees maintain their standard of living in line with inflation, it's important to note that this is only one side of the issue. Taxi drivers, whose wages are regulated, also bear the responsibility of maintaining

industry standards and contributing positively to their sector. However, when we compare this with rideshare drivers, the situation is markedly different.

There are no such protections for rideshare driver income. Over the past few months, Uber has made several changes that have significantly impacted drivers:

- **Fare reductions:** Uber claims fares have decreased by about 3%, but drivers report reductions closer to 20-30%.
- **Removal of fuel subsidies:** Uber has eliminated the fuel subsidy, increasing operational costs for drivers.
- **Increased commission:** Drivers who were previously on lower commission rates now face higher fees.
- **Increased competition:** Uber has also introduced more drivers, diluting the available income for each individual.

Looking ahead, Uber plans to:

- **Remove EV commission incentives:** Drivers using electric vehicles will no longer receive commission benefits.
- **Restructure vehicle classifications:** This will result in many drivers losing eligibility for higher fare categories, despite having purchased vehicles specifically for this purpose.

Summary of Responses:

1. **Rideshare Fare Fairness:** Some respondents argue that rideshare fares should be reasonable for both drivers and passengers. A more flexible system, allowing for negotiation of fares based on pickup location, is suggested, especially since drivers often spend time in traffic without adequate compensation.
2. **Taxi Fare Indexation:** There is broad support for the continued indexation of taxi fares, ensuring that taxi drivers' incomes remain aligned with inflation. However, there's concern that while taxi fares are regulated, rideshare driver incomes remain unprotected and subject to fluctuating market conditions.

Key Issues for Rideshare Drivers:

- **Income disparity:** Unlike taxi drivers, rideshare drivers face dynamic fare structures with little control over fare reductions.
- **Lack of regulation:** While taxi fares are protected through regulation, rideshare driver incomes are subject to cuts and increasing costs, with no safeguards in place.

RECOMMENDATION 8: Surge pricing safeguards to protect consumers in emergency situations

- Agree/disagree with recommendation (average response): Disagree

Summary of responses on the recommendation:

1. **Support for Surge Pricing Based on Supply and Demand:** Several drivers emphasize that surge pricing is a global practice based on market forces, and riders make a conscious choice when using rideshare services during peak times. They argue that surge pricing incentivizes drivers to operate during high-demand periods and ensures rides are available to customers, especially when other transport options (like taxis) may not have surge pricing.
2. **Driver Control Over Pricing:** One suggestion is to give drivers more control over surge pricing, allowing them to turn it on or off based on personal preference. This would provide flexibility, particularly during unsociable hours when driving for regular fares may not be economically viable.
3. **Surge Pricing Benefits Drivers:** Drivers point out that surge pricing helps them recover lost income, especially in the face of falling earnings. It's seen as a vital mechanism to encourage drivers to work during high-demand periods, ensuring service availability for passengers.
4. **Mitigating Surge Pricing:** Some rideshare companies already implement strategies to reduce surge pricing occurrences. For example, offering bonuses to drivers during known busy periods and employing more drivers. Riders also have several ways to avoid surge pricing, such as using alternate modes of transport or adjusting their travel times.
5. **Concerns Over Fake Surge Pricing:** There is concern that some drivers may be manipulating the system to create fake surge pricing. The recommendation is for companies to investigate and adjust their algorithms to prevent such activities.
6. **Impact on Rideshare Versus Taxis:** A key distinction is that rideshare services do not have dedicated ranks like taxis, making it more challenging to meet passenger demand, further justifying the need for surge pricing to motivate drivers.

In summary, while drivers largely support surge pricing as a necessary market-based mechanism, some are open to discussing potential improvements, particularly in ensuring transparency and preventing system manipulation.

RECOMMENDATION 9: Responsive pricing set by the Minister.

- Agree/disagree with recommendation (average response): Neutral/Don't care

Summary of responses on the recommendation:

The feedback received highlights several concerns:

1. **EFTPOS Fees and Regulation:** It was noted that the charges associated with using unauthorised EFTPOS terminals are high, and there should be regulation to standardise or minimise transaction fees. Furthermore, it was pointed out that if two parties agree on a fare outside the meter system, it is typically lawful.
2. **Disparity Between Taxi and Rideshare:** Rideshare drivers do not benefit from fuel subsidies, after-hours, weekend, or public holiday shift penalties, unlike taxi drivers. The concern is that these measures, while aiming to standardise the industry, may actually widen the gap between taxi and rideshare operators, who provide the same services but are treated differently.
3. **Surge Pricing Control:** Some drivers believe they should have more control over pricing, including the ability to opt out of surge pricing. A scenario was described where a driver earns too little for inconvenient hours (e.g., early Sunday morning), suggesting that current rates are not sufficient to make the job viable given inflation.
4. **Wages and Viability:** Questions were raised about whether this recommendation would improve wages for drivers. The lack of clarity on how it would be implemented and whether it would be effective at addressing pay concerns was also highlighted.

In summary, while there is some agreement with the idea of responsive pricing in principle, the unequal application of these provisions between taxis and rideshare services, along with concerns about driver wages and fare controls, make it difficult for rideshare drivers to fully support the recommendation.

RECOMMENDATION 10: New sanctions for unauthorised use of EFTPOS and meters

- Agree/disagree with recommendation (average response): Agree

Summary of responses on the recommendation:

1. **High Transaction Fees:** Respondents highlighted that the fees associated with unauthorised EFTPOS terminals can be excessively high. There were calls for regulation to standardize or minimize these transaction costs to protect customers from unfair charges.
2. **Agreed Fares:** Some respondents pointed out that if a fare is agreed upon between the driver and the passenger, and it follows customary practice, it should be considered lawful, even if the payment is processed outside of a meter.

3. **Support for Increased Sanctions:** Several respondents expressed strong support for implementing new or increased sanctions against the unauthorised use of EFTPOS and meters. Even though these issues do not directly impact rideshare drivers, respondents acknowledged that such practices reflect poorly on the point-to-point transport industry as a whole.
4. **Rideshare Exemption:** It was noted that under current regulations, rideshare drivers are not required to use meters, making this issue less relevant to their operations.

In summary, respondents supported measures to address unauthorised EFTPOS and meter use, emphasizing the need for regulation of transaction fees and ensuring fair practices in fare agreements.

RECOMMENDATION 11: Introduce a General Safety Duty and Chain of Responsibility.

- Agree/disagree with recommendation (average response): Neutral/Don't care

Summary of responses on the recommendation:

- Some supported the introduction of stricter regulatory compliance and penalties, emphasizing the need for driver training to enhance safety and accountability across the industry.
- There was general agreement with formalizing responsibilities at all levels, indicating support for a structured approach to safety and accountability within the rideshare and transport sector.

RECOMMENDATION 12: Safety focussed vehicle identification requirements

- Agree/disagree with recommendation (average response): Strongly disagree

Summary of responses on the recommendation:

- **General disagreement with permanent stickers:** Most respondents oppose the recommendation for permanent, tamper-evident stickers on rideshare vehicles. They argue that many rideshare drivers use their vehicles for both work and personal purposes, so permanent signage would negatively affect the vehicle's value and personal use.
- **Part-time drivers and dual-use vehicles:** Respondents highlight that unlike taxis, which are dedicated to commercial use, rideshare vehicles are often used privately. They emphasize that the proposed requirement is unfair to drivers who weren't aware of such changes when acquiring their vehicles.
- **Existing identification methods are sufficient:** Several participants note that rideshare vehicles already have visible compliance stickers on the front and rear windscreens. These are easy to spot and serve the intended purpose of identifying the vehicle during rideshare operations.

- **Alternatives to permanent stickers:** Some respondents propose alternatives to permanent signage, including a temporary or semi-permanent illuminated sticker that could be activated via Bluetooth when the rideshare app is in use. This would offer a balance between visibility and personal vehicle use.
- **Comparison with taxis:** There's a consensus that taxis are purpose-built for commercial use, making permanent signage appropriate, while rideshare vehicles should not be subject to the same requirements due to their dual role.
- **Safety and identification concerns:** One suggestion was for the option of installing a clear perspex safety barrier in the vehicle to enhance driver protection, and that drivers should have the flexibility to choose whether or not to display additional logos on their vehicles.
- **Chauffeur services:** There was also a point made regarding chauffeur vehicles, suggesting that these already have signage, and the driver typically knows who they are picking up, rendering additional signage unnecessary.

In conclusion, while respondents generally support increased visibility for rideshare vehicles, they believe that the requirement for permanent signage is excessive and impractical for personal vehicles. They suggest more flexible, technology-driven solutions that align with the part-time and dual-use nature of rideshare driving.

RECOMMENDATION 13: Maintain vehicle age limits to ensure safety, with some changes.

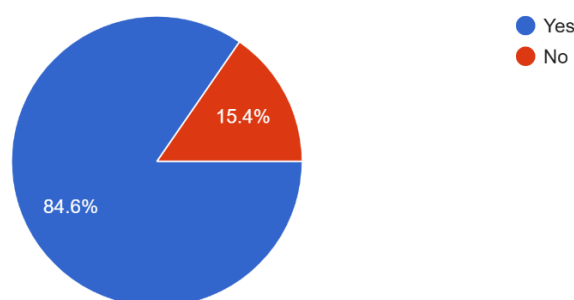
- Agree/disagree with recommendation (average response): Agree

Summary of responses on the recommendation:

- Respondents generally support the proposed age limit of ten years, with some suggesting that this period be reviewed and adjusted if necessary, based on emerging issues or safety concerns. Response from the survey is below:

12. Do you agree with the recommendation to increase and unify the age of taxi and rideshare vehicles to 10 years?

78 responses



RECOMMENDATION 14: Introduce consistent vehicle inspection requirements

- Agree/disagree with recommendation (average response): Neutral/Don't care

Summary of responses on the recommendation:

1. **Support for safety and presentation** – One respondent strongly agrees with the recommendation, citing safety and visual presentation as key reasons for supporting more frequent inspections.
2. **Inspection based on vehicle usage** – Another respondent recommends keeping the 12-month inspection schedule for rideshare vehicles up to 10 years old. However, if a vehicle travels more than 20,000 km in a six-month period, an additional inspection should be required.
3. **Distinguishing based on vehicle usage** – Another response highlights that taxis experience more wear and tear due to multiple drivers, whereas chauffeur vehicles, often driven by a single person, endure less strain. Inspections should account for this difference.
4. **Kilometre-based inspections** – One suggestion is to base the frequency of inspections on the number of kilometres driven after the five-year mark, ensuring high-mileage vehicles are inspected more frequently.

In summary, respondents largely support the idea of regular inspections, with suggestions for adjustments based on vehicle age, mileage, and usage type to reflect varying wear and tear.

RECOMMENDATION 15: Remove unnecessary vehicle requirements

- Agree/disagree with recommendation (average response): Neutral/Don't care

Summary of responses on the recommendation:

1. **Concern about bull bars**: Several respondents are cautious about allowing vehicles with bull bars to operate as rideshares. They argue that typical rideshare activities, such as pickups and drop-offs at driveways, kerbsides, and car parks, involve navigating areas with unexpected foot and vehicle traffic. They believe the presence of bull bars could make these manoeuvres more difficult and pose a safety risk to pedestrians and other road users.
2. **Lack of clarity on special cases**: There is concern that the recommendation lacks detail on whether it applies to special cases or specific vehicle types. Without clear information, respondents feel unable to fully support the proposal, as they are considering the impact on regular day-to-day rideshare operations.

3. **Child seats and rideshare vehicles:** One respondent questioned why taxis are not required to carry child seats, while rideshare drivers are.
4. **Support for utility vehicles:** There is support for allowing twin-cab utility vehicles to be included in the rideshare system, but specific conditions or use cases were not elaborated upon.

RECOMMENDATION 16: Remove engine capacity requirements

- Agree/disagree with recommendation (average response): Neutral/Don't care

Summary of responses on the recommendation:

1. **Customer transparency:** One respondent emphasized the importance of customers knowing what type of car and engine they are booking. There's concern that if engine capacity requirements are removed, customers might be disappointed if, for example, a small vehicle like a three-cylinder car arrives to pick up a large group of passengers. They suggest that both drivers and customers should have clear information about the number of passengers a vehicle can accommodate, and there should be an option to specify this during the booking process.
2. **Opposition to forced EV use:** Another respondent expressed opposition to being forced to use full electric vehicles (EVs), indicating resistance to mandates related to vehicle types.

RECOMMENDATION 17 Enable point-to-point vehicles to have less than four doors

- Agree/disagree with recommendation (average response): Disagree

Summary of responses on the recommendation:

1. **Preference for Four-Door Vehicles:** Most respondents expressed a preference for four-door vehicles, particularly for ease of access, especially for elderly passengers or those with mobility issues. Two-door vehicles, like coupes, were seen as impractical in everyday rideshare situations, requiring passengers to fold down front seats, which can be inconvenient.
2. **Limited Suitability of Two-Door Vehicles:** Many felt that two-door vehicles, such as coupes or sports cars, are unsuitable for rideshare, particularly in common scenarios like airport transfers or when carrying multiple passengers and luggage. Two-door vehicles are typically lower to the ground, making them harder to access, especially for elderly or physically impaired riders.
3. **Passenger Notification Concerns:** While the recommendation proposes notifying passengers if a vehicle has fewer than four doors, respondents felt that placing the

burden on passengers to verify the type of vehicle was unacceptable. They argued that some passengers may not be tech-savvy enough to select appropriate vehicles and may not realize they've booked a two-door vehicle until it arrives, leading to frustration or the need to cancel and rebook rides.

4. **Need for a Separate Vehicle Category:** A common suggestion was to create a separate category for two-door vehicles, like Uber does with different categories (e.g., for larger vehicles). This would allow special types of vehicles for niche markets (e.g., vintage or event cars) without affecting the broader rideshare service.
5. **Impractical for Day-to-Day Rideshare:** Two-door vehicles were seen as impractical for regular rideshare services due to safety, comfort, and convenience concerns. Some respondents questioned the rationale behind the recommendation, suggesting it might cater more to special events rather than everyday rideshare needs.
6. **Special Interest Group Influence:** There was some speculation that this recommendation, along with others like 15, 16, and 18, might have been influenced by special interest groups. Respondents felt these recommendations apply to a niche market rather than benefiting the broader rideshare community.

In summary, respondents were generally against allowing rideshare vehicles with fewer than four doors, citing safety, comfort, and practicality concerns. They recommended that two-door vehicles be categorized separately for specific use cases.

RECOMMENDATION 18: Enable left hand drive vehicles in the industry

- Agree/disagree with recommendation (average response): Disagree

Summary of responses on the recommendation:

1. **Agree** – One respondent supports the recommendation to allow left-hand drive vehicles.
2. **No left-hand drive cars, it won't work** – Another respondent opposes the recommendation, expressing that left-hand drive vehicles would not be practical in the industry.

RECOMMENDATION 19: Require cameras in all point-to-point vehicles

- Agree/disagree with recommendation (average response): Disagree

Summary of responses on the recommendation:

Key Concerns:

1. Cost and Responsibility:

- Clarification is needed on the criteria, model, and cost of the cameras.
- Uncertainty around who will bear the cost of the installation—drivers or the industry.
- Potential additional costs for data transfer and storage on a central server, which could impact driver income.

2. Data Handling and Access:

- Questions raised about which agencies will handle downloading data and the procedures involved.
- Concerns about whether rideshare drivers will have access to the recorded data.
- Drivers lack control over what is recorded and how the data is managed during personal use of the vehicle, raising privacy concerns.

3. Safety and Fairness:

- Drivers are vulnerable to false claims, such as passengers fabricating incidents (e.g., sexual assault, verbal or physical abuse) to extort money.
- Stricter penalties for rider misbehavior should be introduced.
- Driving unroadworthy vehicles should have more rigorous compliance checks.

Positives:

- Many rideshare drivers may appreciate regulatory clarity on safety cameras, as opinions on their use vary.
- Camera recordings would help corroborate reports of misconduct, protecting both riders and drivers, and benefit the industry overall.
- Cameras could deter misbehavior by both parties.
- The central storage of data ensures it is tamper-proof, preserving its evidentiary value.

Negatives:

- **Privacy Issues:**

- Rideshare vehicles are used for both personal and business purposes, and an "always-on" camera would infringe on the privacy of the driver, their family, and friends.
- Drivers have no control over the recording when using the vehicle for personal purposes, creating a significant privacy breach.

- **Installation and Resale Impact:**

- The permanent installation of cameras could lower the resale value of vehicles, as removal would leave visible marks.
- The \$1,500 cost (or leasing at \$60/month) plus installation is burdensome, especially with declining rideshare income.
- The growing disparity between rideshare and taxi driver income is exacerbated by rising taxi fares and lower rideshare earnings.

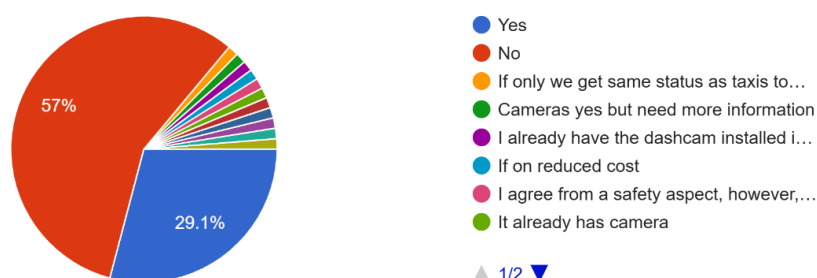
Potential Solutions:

- Develop a camera system that balances compliance with government regulations and minimizes impact on vehicle integrity and privacy.
- A possible solution could involve using Bluetooth communication between the rideshare app and the camera, ensuring the camera only activates when the driver is on duty.
- Reducing the camera's physical footprint could also help address concerns about vehicle depreciation and privacy.

Survey responses:

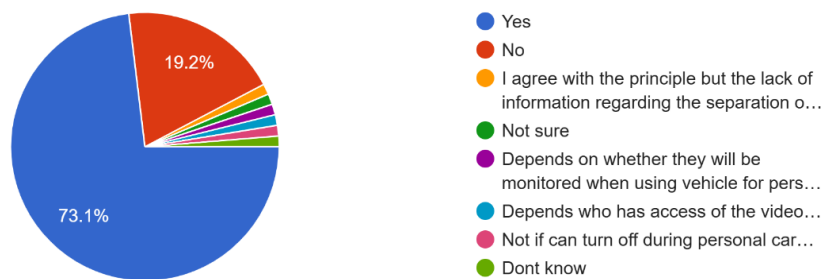
10. Do you agree with the recommendation to fit a government-issued camera to your rideshare car?

79 responses



11. Do you think having a government issued camera fitted to your rideshare car is a breach of your personal privacy?

78 responses



RECOMMENDATION 20: Remove regulatory uniform requirements

- Agree/disagree with recommendation (average response): Agree

Summary of responses on the recommendation:

- **General consensus:** Most respondents agree that uniforms do not directly affect rideshare drivers, but opinions vary on whether they should be mandated or not.
- **Positive outlook on uniforms:** Some believe that a well-designed, fit-for-purpose uniform could enhance professionalism and appearance. One respondent highlighted their personal experience, noting that while uniforms are intended to maintain a professional look, they often become creased or untidy due to the nature of the work, leading to a less polished appearance.
- **Concerns about casual attire:** There is concern that removing uniform requirements altogether may lead to drivers dressing too casually, which could negatively impact the perception of the service, especially in high-visibility locations like airports. The respondent mentioned seeing rideshare drivers in casual wear such as tracksuit pants and t-shirts during a strike, which they felt presented an unprofessional image.
- **Alternative uniform suggestions:** A suggestion was made for a more practical and comfortable uniform, such as a modern, dark-colored, semi-stretch polo shirt and trousers made from stretch fabric. This type of uniform would be easier to maintain, more comfortable for long hours, and still present a professional appearance.
- **Diverse views on uniform flexibility:** Some respondents prefer the flexibility to choose what they wear, as long as it reflects a neat and tidy appearance that aligns with their business. One chauffeur expressed the need for comfort while still maintaining a professional look.

RECOMMENDATION 21: Further consider guidelines and industry standards related to driver safety.

- Agree/disagree with recommendation (average response): Agree

Summary of responses on the recommendation:

1. **Tracking Driver Hours:** One respondent suggested that driver hours could be tracked anonymously using Driver Accreditation as a key identifier. This data could be sent to a central control system to monitor driving times, with alerts sent to the rideshare platform in case of fatigue concerns.
2. **Fatigue and Safety:** Multiple respondents acknowledged that driver fatigue is a significant safety issue, and there is a need for better regulation and monitoring, especially as drivers can work across multiple platforms, including food delivery.
3. **Monitoring Food Delivery Drivers:** One response emphasized that food delivery drivers, particularly international students and motorbike riders, should be monitored closely. They also suggested investigating accident rates across Australia to understand the risks better.
4. **Rest Between Jobs:** A respondent questioned why driving for multiple platforms would be an issue if the driver has rested adequately between jobs, suggesting that rest management should also be considered.
5. **General Agreement:** There was broad agreement that driving is a serious responsibility and that fatigue management needs to be addressed to ensure safety.

RECOMMENDATION 22: Provide a framework for more on vehicle advertising

- Agree/disagree with recommendation (average response): Neutral/Don't care

Summary of responses on the recommendation:

- The majority of respondents expressed little interest in on-vehicle advertising, with one noting it holds "little to no interest."
- There was a suggestion that advertising should be restricted to the back of the vehicle, with a maximum size of 40cm x 40cm, and that vehicle owners should have the freedom to choose what is advertised.
- One person strongly opposed the idea, stating that they do not want their car covered with advertising.

RECOMMENDATION 23: Investigate implementation of safe drop off and pick up zones in high traffic areas Taxi ranks serve as a safe and dedicated pick-up and drop-off (PUDO) point for taxi passengers, however, no similar, permanent alternatives are currently available for rideshare services. Temporary zones have been used for events, such as the Adelaide Fringe.

- Agree/disagree with recommendation (average response): Strongly Agree

Summary of responses on the recommendation:

Key Themes from the Responses:

1. Allowing Rideshare Access to Taxi Zones:

- Many respondents believe that rideshare drivers should be allowed to use taxi ranks, loading zones, and other dedicated areas for quick drop-offs and pick-ups, as taxis and rideshare services share the same market.
- Suggested measures include mandatory hazard lights during these operations and penalties for non-compliance. Sharing these zones would alleviate congestion and improve safety.

2. Rideshare Consideration in Urban Planning:

- Respondents question if the City of Adelaide Council's urban plan and South Australia's master development plan have included provisions for dedicated rideshare PUDO zones.
- They call for interim solutions, with dedicated zones in council areas until permanent ones are established.

3. Safety Concerns and Operational Challenges:

- The absence of designated PUDO zones poses safety risks for drivers, passengers, and pedestrians. Navigating congested areas without dedicated zones often leads to infringements and unsafe situations.
- Rideshare app functionality exacerbates the issue, allowing riders to request pick-ups in illegal or unsafe locations, leading to negative driver ratings and even trip cancellations.

4. Existing Examples and Local Discussions:

- Brisbane is cited as a successful example of a city with designated rideshare zones, highlighting a gap in other cities.

- Local councils, such as City of Holdfast Bay, have shown initial interest in creating rideshare zones, but no action has been taken, despite increasing parking infringements.
- The Adelaide City Council has stated that they cannot provide rideshare zones, despite regulations allowing for it.

5. Frustration with Local Government and Call for Collaboration:

- Respondents expressed frustration over the lack of collaboration and understanding from local councils, accusing them of prioritizing revenue generation from parking fines rather than addressing the need for safe rideshare zones.
- They call for a joint effort between state government, councils, and rideshare companies to establish fair and safe PUDO zones, much like those available to taxis.
- Data sharing from rideshare companies is suggested as a tool to identify “hot zones” for pick-ups and drop-offs, which could help guide the placement of new PUDO zones.

6. Real-World Examples from Drivers:

- Multiple respondents shared personal experiences of being fined for stopping briefly to assist passengers, despite the lack of alternative safe spaces, and highlighted inconsistent enforcement compared to taxis.
- Drivers transporting passengers with disabilities, elderly riders, or young children face added challenges, as these individuals often require extra time for pick-up or drop-off.
- There are concerns that local councils are leveraging fines as a revenue stream while ignoring the need for legal and safe PUDO zones.

7. Impact on Driver Ratings and Livelihoods:

- The lack of accessible parking for pick-ups often results in trip cancellations and negative ratings from riders, which can affect drivers’ livelihoods by leading to deactivation from rideshare platforms.

Specific Suggestions:

- Create shared PUDO zones for taxis and rideshare services, especially in high-traffic areas like the CBD.
- Provide a minimum of 5 minutes for pick-ups and drop-offs to accommodate passengers with special needs.

- Collaborate with councils and rideshare companies to use data to locate high-demand areas for PUDO zones.
- Ensure that regulations focus on improving safety and accessibility, rather than increasing fine revenue.

In conclusion, respondents strongly advocate for dedicated PUDO zones for rideshare drivers to improve safety, reduce congestion, and ensure fair treatment compared to taxi services. They call for better collaboration between councils, state governments, and rideshare companies to address these needs effectively.

From the report sent to the Federal Government:

Rideshare drivers in South Australia are facing significant challenges due to a lack of designated Pick-Up and Drop-Off (PUDO) zones across the city, leading to frequent fines and unsafe working conditions. One respondent commented that on 6 September 2024 I attended an event at Festival Central, and when I left, I noticed taxis parked on a yellow line where there was no designated rank. These taxis weren't pre-booked and were simply waiting. After about 10 minutes, a private police car arrived, but instead of issuing on-the-spot fines like they typically do with rideshare vehicles, the officers merely instructed the drivers to move their cars verbally.

In contrast, rideshare drivers often face a different reality. There are no designated Pick-Up and Drop-Off (PUDO) zones in Adelaide, making it nearly impossible to comply with regulations without risking fines. For instance, I was fined on Prospect Road outside the Coles shopping centre while helping an elderly passenger with mobility issues. I stopped briefly to let them out, which took less than 10 seconds, but I was issued a \$324 fine for "stopping in a bike lane." Despite the fact that it was after hours and no bike was in sight, the fine stood.

Similarly, Morphett Street in the city has accommodation options but no safe places for rideshare drivers to pick up or drop off passengers, resulting in hefty fines. I received a \$113 fine for trying to drop off a passenger safely. There's a clear need for more PUDO zones, especially in areas like the CBD, where the lack of designated spaces forces drivers to stop illegally or risk endangering passengers.

Rideshare drivers are expected to meet the same tax obligations as any other worker, but they bear additional costs, such as vehicle maintenance and fuel. Yet, they are penalized for performing their jobs under increasingly difficult conditions. Many rideshare drivers have reported receiving fines in areas where it's impossible to pick up or drop off passengers safely, especially in high-traffic locations or near taxi ranks, where rideshare vehicles are prohibited from stopping.

The lack of PUDO zones also poses challenges for drivers transporting passengers with disabilities, elderly riders, or those with young children. These passengers often require more time to get in and out of vehicles, and the absence of safe, designated areas for this results in unnecessary stress and fines for drivers.

There is also a growing concern that local councils are using fines as a revenue stream rather than working to create more legal PUDO zones. Some have accused councils of deliberately ignoring the needs of rideshare drivers and riders by failing to provide safe and accessible pick-up and drop-off areas while converting existing loading zones into taxi-only areas. Additionally, AI technology used by local councils is exacerbating the problem by issuing fines automatically without considering the working conditions or safety concerns faced by drivers.

As highlighted in a recent comment from a female rideshare driver, the inability to find a legal parking spot for pick-up resulted in a trip cancellation. In many cases, riders are frustrated when they can't be picked up right where they're standing, leading to uncomfortable rides and low driver ratings. These low ratings can even result in drivers being deactivated from the platform, further jeopardizing their livelihood.

In summary, rideshare drivers are calling for more PUDO zones, particularly in the CBD and high-traffic areas like Hindley Street, North Terrace, and Currie Street. These zones should be shared with taxi ranks and clearly marked with signage. Drivers are also advocating for a minimum of 5 minutes in these zones to accommodate passengers with specific needs. It's time for local governments to stop treating this issue as a cash cow and start facilitating safer, fairer working conditions for rideshare drivers.

Actual Comments on PUDO (pick-up/drop-off) zones. (Question 14 of survey)

1. Where there are taxi zones rideshare should be as well
2. Need much more of them
3. The time stopped at the PUDO zones depends on the type of rider ie young people, to people with disabilities or the elderly using walking aids.
4. Fined for passenger drop off in Glenelg, SA
5. Several local government areas are actively trying to treat this issue as a cash cow rather than facilitating more legal PUDO zones
6. We are being bullied and discriminated against, for the benefit of Taxi's
7. At this point just take risk on PUDO as all rider don't care.
8. We should have some ranks and PUDO zones for safety
9. Was fined in Prospect \$312.00 for picking up a passenger less than 2 mins stop
10. NO PUDO Zones in South Australia
11. Not enough
12. Sometimes it is difficult to make a decision while picking up / dropping off a customer on where to park during peak hours. If it's a safe spot to stop while working, why fine?
13. Near every taxi stand there should be a PUDO zone with 2 minutes restriction.
14. There are no pudo zones anywhere in Adelaide. Any where we stop ranger came and give us fines
15. Fined picking up mother and child in school pick up area in Tranmere.
16. Our riders could have mobility issues. They could be elderly or have young children.
17. All we would like is some 2 minute drop-off & pick-up points like Brisbane and other Australian Cities, but instead we get more Cameras & fines & No response!
18. A ride share driver got fined by a community safety officer at 2am in the morning at a No standing sign opposite the taxi rank in Glenelg.

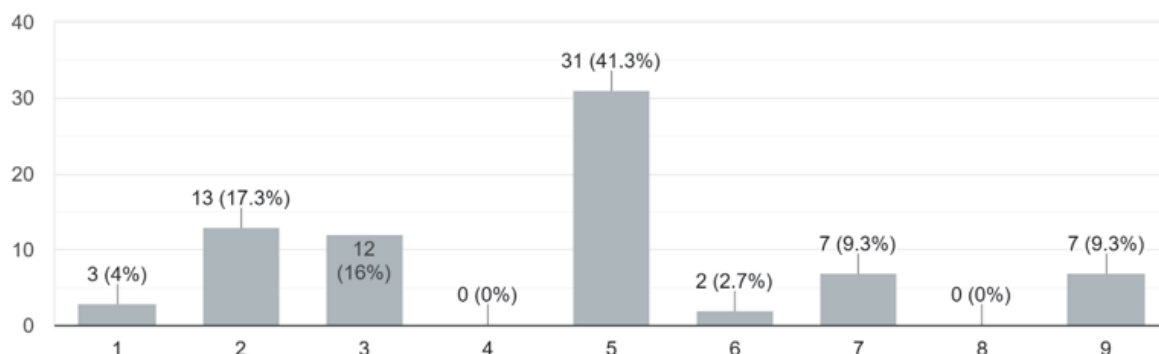
19. Ride share drivers are being fined at 2am in the morning at the no standing sign from midnight to 6am. They are also being followed by council vehicles at this time of the morning.
20. Local councils are increasing risks to both the public and gig economy workers.
21. Comment received from female rideshare driver at 11:30pm, 10/8/2024: Not being able to get a parking space anywhere in a street to legally pick up a rider resulted in trip cancellation. Also when a rider has to walk to the driver who is legally parked and waiting for the driver causes lots of problems. Sometimes the rider is annoyed that they cannot be picked up right at where they are standing. This can cause stress on the driver who has to constantly apologise for being legally compliant with where we can stop. These situations often result in an uncomfortable trip and the driver getting a one star lowest rating from the rider on completion of the trip. These accumulation of low ratings can result in less work and even deactivating a driver for having low ratings or false reports through no fault on there part for simply trying to do there job.
22. I was fined on Prospect Road out the front of the Coles shopping centre as the rider had mobility issues as they were elderly and there was no where to safely park. I let the rider out of my vehicle which only took no more than 10 seconds. I was issued a "Stopped in Bike Lane "fine and I had stopped 1 car space in front of an unmarked car which took a photo of my car 2 metres directly in front of it. The zone said 5.30pm -7pm Bike Lane. I did not see the sign nor was there any bike in sight at the time .The fine incurred was \$324.00
23. If the rider is a person with disability, more than 1 minute will be needed.
24. Fined in Glenelg
25. Glenelg
26. Mostly CBD
27. it should be legal a for rideshare vehicles to stop just to pick and drop off customers as it could be inconvenient for customer to walk and not professional for divers to drop customers away from the destination.
28. PUDO zones need to be designated and shared with specific riders who would voluntarily advocate of standing in those areas. Councils should be given the recommendation of fining individuals who don't follow the PUDO zones.
29. Morphett St City, has accommodation but no pick up areas. cost me \$113.00
30. Should be allowed to pudo in taxi zones
31. Pudo zones should be everywhere as like taxi zone
32. There are no (zero) designated PUDO zones in Adelaide CBD for rideshare services. Also, too may taxi zones and we see existing loadings zones being covered to permanent taxi zones (ie: 55 Currie St) leaving rideshare drivers to do illegal pickups/drop offs in popular locations in the city. Additionally, PUDO zones should be 5mins minimum and sign's should posted around the popular areas ie: Hindley st, Nth Tce, Currie St advising people with clear directions to nearest PUDO zone. Also enforce rideshare service providers to only select designated PUDO zones as pickup/drop off.
33. One minute is insufficient due to time taken for riders to appear; input for the review concluded prior to my commencement - anecdotally, this was not well circulated, if at all, to the Rideshare drivers.
34. There should be a waived off time for the ride-share driver to drop off or pick up customer

35. There is not enough parking for pudo. Always get stress because of fine while pick up and drop off passenger. It's trigger our mental health.
36. Allow at least 1 min to rideshare drivers, because customers are not willing to walk somewhere or they don't aware of the rules, they just stop at Yello lines and we cant do that
37. Need more pudo zones, and need them vacant. Commercial/Tradie Vehicles should not be allowed in the zone.
38. Rideshare drivers are subject to the same tax obligations as individuals in other professions, yet they also bear additional costs, such as vehicle maintenance and fuel expenses. Furthermore, the majority of their passengers are Australian citizens. It is unjust that drivers are penalized for simply performing their job.
39. Unable to safely drop of passengers in best drop off because Uber can't stop at the taxi rank
40. Have made comments pre 2019 regarding these matters
41. Its very hard to pick customer sometimes its bus zone during day or no parking
42. Need more pudo zone in city
43. I have had severely reduced mobility people in my car who need time to get in and out of the car plus equipment.

15. What is the maximum amount of time you should be allowed to be stationary in order to effect a pick up drop off in minutes?

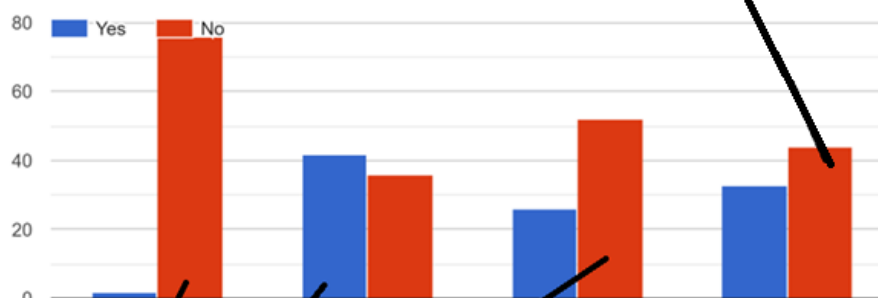
Choose between 1 and 9. Note some people you are dealing with may have mobility issues.

75 responses



Have you been fined or hassassed (been followed) by a government vehicle (local or state) council during a PUDO ?

No: 44



Is 1 minutes enough when you are stationary doing a PUDO for a passenger?

No: 52

Have you been fined for stopping in an illegal PUDO zones

when there was no appropriate or safe PUDO zones available? Yes: 42

Do you think there are enough PUDO zones for rideshare? No: 76

Fines:

Have you been fined for stopping in an illegal PUDO zones when there was no appropriate or safe PUDO zones available?	Have you been fined or hassassed (been followed) by a government vehicle (local or state) council during a pick up or drop off? No	Have you been fined or hassassed (been followed) by a government vehicle (local or state) council during a pick up or drop off? Yes	(blank)	Grand Total
No	28	7	1	36
Yes	16	26		42
(blank)			2	2
Grand Total	44	33	3	80

Fine Data as at end September 2024:

<ul style="list-style-type: none"> Grenfell Street, ADELAIDE 8695 <ul style="list-style-type: none"> Contravene No Stopping Sign 4528 <ul style="list-style-type: none"> 2018 660 2019 665 2020 476 2021 422 2022 398 2023 871 2024 1036 Stop in a Bus Zone 1829 <ul style="list-style-type: none"> 2018 192 2019 186 2020 127 2021 103 2022 130 2023 438 2024 653 Stop in a Taxi Zone 632 <ul style="list-style-type: none"> 2018 175 2019 139 2020 34 2021 21 2022 41 2023 56 2024 166 	<ul style="list-style-type: none"> Currie Street, ADELAIDE 6500 <ul style="list-style-type: none"> Contravene Motor Bike Parking Sign 5 Contravene No Parking Sign 17 Contravene No Stopping Sign 4007 <ul style="list-style-type: none"> 2018 602 2019 505 2020 420 2021 402 2022 369 2023 725 2024 984 Stop in a Bus Zone 1310 <ul style="list-style-type: none"> 2018 98 2019 159 2020 94 2021 105 2022 116 2023 326 2024 412 Stop in a Taxi Zone 203 <ul style="list-style-type: none"> 2018 26 2019 26 2020 15 2021 9 2022 23 2023 24 2024 80
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Glenelg Jetty Road example:

	2021	2022	2023	2024 till end July	Aug-24	Sep-24
Mosely Road, Glenelg: - stopping on continuous yellow line (offence 116) - Valid count	74	40	216	2139	419	468

What organisation receives the fines? Is it DIT or the Council, or is it split?

Scenario to Consider:

What should this driver have done? Fine in Taxi Rank outside Ibis Hotel, City. Had to drop a rider, and straight away had a new rider to pick up at same spot?

Please outline in your response what this driver should have handled this situation legally. Fine \$158 due 7 November 2024. More scenarios can be discussed too.

Yes, you can see it zoom in car pic. Its on right bottom

Pick up or

replied to you

Was it a drop off or pick up?

It was both. Firstly i dropoff someone at the same time i got other rider to pickup there

Dropoff off passenger have coles Rundle mall location entry from grenfell st

There's no way i can stop in front of rundle gate as that all are bus stop and no stop zone

So i asked him that i will drop you little further

I have trip record it help

You can see jake trip say coles rudle place

And other one is vadini which i got ping while on grenfell road to drop jake

You can see vadini also have pickup location from shop near Rundle place. So ask her to come to me as theres no place to pickup where she requested

While iam waiting for vadini come to me in between i got captured by council parking car

22. How has the ticket-less fines from surveillance cameras impacted your behavior and well being?

75 responses



Comments on PUDO (pick-up/drop-off) zones. (Question14)

44. Where there are taxi zones rideshare should be as well
45. Need much more of them
46. The time stopped at the PUDO zones depends on the type of rider ie young people, to people with disabilities or the elderly using walking aids.
47. Fined for passenger drop off in Glenelg, SA
48. Several local government areas are actively trying to treat this issue as a cash cow rather than facilitating more legal PUDO zones
49. We are being bullied and discriminated against, for the benefit of Taxi's
50. At this point just take risk on PUDO as all rider don't care.
51. We should have some ranks and PUDO zones for safety
52. Was fined in Prospect \$312.00 for picking up a passenger less than 2 mins stop
53. NO PUDO Zones in South Australia
54. Not enough
55. Sometimes it is difficult to make a decision while picking up / dropping off a customer on where to park during peak hours. If it's a safe spot to stop while working, why fine?
56. Near every taxi stand there should be a PUDO zone with 2 minutes restriction.
57. There are no pudo zones anywhere in Adelaide. Any where we stop ranger came and give us fines
58. Fined picking up mother and child in school pick up are in Tranmere.
59. Our riders could have mobility issues. They could be elderly or have young children.
60. All we would like is some 2 minute drop-off & pick-up points like Brisbane and other Australian Cities, but instead we get more Cameras & fines & No response!
61. A ride share driver got fined by a community safety officer at 2am in the morning at a No standing sign opposite the taxi rank in Glenelg.
62. Ride share drivers are being fined at 2am in the morning at the no standing sign from midnight to 6am. They are also being followed by council vehicles at this time of the morning.
63. Local councils are increasing risks to both the public and gig economy workers.
64. Comment received from female rideshare driver at 11:30pm, 10/8/2024: Not being able to get a parking space anywhere in a street to legally pick up a rider resulted in trip cancellation. Also when a rider has to walk to the driver who is legally parked and waiting for the driver causes lots of problems. Sometimes the rider is annoyed that they cannot be picked up right at where they are standing. This can cause stress on the driver who has to constantly apologise for being legally compliant with where we can stop. These situations often result in an uncomfortable trip and the driver getting a one star lowest rating from the rider on completion of the trip. These accumulation of low ratings can result in less work and even deactivating a driver for having low ratings or false reports through no fault on there part for simply trying to do there job.
65. I was fined on Prospect Road out the front of the Coles shopping centre as the rider had mobility issues as they were elderly and there was no where to safely park. I let the rider out of my vehicle which only took no more than 10 seconds. I was issued a "Stopped in Bike Lane "fine and I had stopped 1 car space in front of an unmarked car which took a photo of my car 2 metres directly in front of it. The zone said 5.30pm

-7pm Bike Lane. I did not see the sign nor was there any bike in sight at the time .The fine incurred was \$324.00

66. If the rider is a person with disability, more than 1 minute will be needed.
67. Fined in Glenelg
68. Glenelg
69. Mostly CBD
70. it should be legal a for rideshare vehicles to stop just to pick and drop off customers as it could be inconvenient for customer to walk and not professional for divers to drop customers away from the destination.
71. PUDO zones need to be designated and shared with specific riders who would voluntarily advocate of standing in those areas. Councils should be given the recommendation of fining individuals who don't follow the PUDO zones.
72. Morphett St City, has accommodation but no pick up areas. cost me \$113.00
73. Should be allowed to pudo in taxi zones
74. Pudo zones should be everywhere as like taxi zone
75. There are no (zero) designated PUDO zones in Adelaide CBD for rideshare services. Also, too may taxi zones and we see existing loadings zones being covered to permanent taxi zones (ie: 55 Currie St) leaving rideshare drivers to do illegal pickups/drop offs in popular locations in the city. Additionally, PUDO zones should be 5mins minimum and sign's should posted around the popular areas ie: Hindley st, Nth Tce, Currie St advising people with clear directions to nearest PUDO zone. Also enforce rideshare service providers to only select designated PUDO zones as pickup/drop off.
76. One minute is insufficient due to time taken for riders to appear; input for the review concluded prior to my commencement - anecdotally, this was not well circulated, if at all, to the Rideshare drivers.
77. There should be a waived off time for the ride-share driver to drop off or pick up customer
78. There is not enough parking for pudo. Always get stress because of fine while pick up and drop off passenger. It's trigger our mental health.
79. Allow at least 1 min to rideshare drivers, because customers are not willing to walk somewhere or they don't aware of the rules, they just stop at Yello lines and we cant do that
80. Need more pudo zones, and need them vacant. Commercial/Tradie Vehicles should not be allowed in the zone.
81. Rideshare drivers are subject to the same tax obligations as individuals in other professions, yet they also bear additional costs, such as vehicle maintenance and fuel expenses. Furthermore, the majority of their passengers are Australian citizens. It is unjust that drivers are penalized for simply performing their job.
82. Unable to safely drop of passengers in best drop off because Uber can't stop at the taxi rank
83. Have made comments pre 2019 regarding these matters
84. Its very hard to pick customer sometimes its bus zone during day or no parking
85. Need more pudo zone in city
86. I have had severely reduced mobility people in my car who need time to get in and out of the car plus equipment.

RECOMMENDATION 24: Enforce greater compliance at taxi ranks and vehicles ‘plying for hire’ in contravention of conditions

- Agree/disagree with recommendation (average response): Neutral/Don't care

Summary of responses on the recommendation:

- **Concern about passenger preferences:** Some drivers raised the issue that passengers may request to be picked up or dropped off at taxi ranks. They questioned how this would be handled under the new rules.
- **Existing fines:** Drivers mentioned they are already being fined for using taxi ranks, highlighting that current enforcement is already strict.
- **Support for solicitation penalties, but not for pre-booked trips:** There was agreement that fines should apply if drivers are soliciting bookings at taxi ranks. However, drivers stressed that fines should not be imposed for dropping off or picking up pre-booked passengers at taxi ranks.
- **Call for system unification:** Some respondents emphasized the need for a unified system to provide safe services for all passengers, rather than targeting rideshare drivers unfairly.
- **Support contingent on addressing Recommendation 23:** One respondent indicated they would normally support this recommendation, but only if Recommendation 23 (related to designated rideshare areas) is addressed first.
- **Lack of rideshare areas:** The absence of designated rideshare pickup and drop-off zones forces drivers to make difficult decisions. Adding stricter penalties without resolving this issue would unfairly favor taxis over rideshare services, and respondents expressed the need for a balanced approach.

Overall, the feedback highlights a desire for fairness in enforcement, a unified system for passenger safety, and the importance of addressing infrastructure gaps before implementing harsher penalties.

RECOMMENDATION 25: Review data management, collection and sharing requirements

- Agree/disagree with recommendation (average response): Disagree

Summary of responses on the recommendation:

- **Support for Data Sharing:** One respondent expressed strong support for the recommendation, noting the potential benefits of enhanced data sharing to improve road traffic flow and help drivers get passengers to their destinations more efficiently.

- **Concerns about Additional Burden:** Another respondent highlighted concerns that this recommendation could result in more overhead costs for rideshare drivers, adding to their operational challenges.
- **Equity Between Taxis and Rideshare:** There was a question about whether the same data sharing requirements apply to taxis, suggesting a desire for equal treatment between taxis and rideshare services.
- **Potential Misuse of the App:** A respondent pointed out that while rideshare apps monitor drivers, there is a concern that drivers could still misuse the system to work excessively, potentially leading to fatigue. They also suggested that this recommendation is more focused on taxis.

RECOMMENDATION 26: Moving to a greener and more accessible fleet

- Agree/disagree with recommendation (average response): Disagree

Summary of responses on the recommendation:

1. **Charging Infrastructure Concerns:** South Australia currently lacks the necessary charging infrastructure to support a widespread shift to electric vehicles (EVs) in the rideshare and taxi industries.
2. **Reliability of EVs:** There is skepticism about the reliability of EVs, with some models (e.g., Tesla) being downgraded in environmental ratings from UBER Green. This creates hesitancy around EV adoption due to concerns about long-term performance.
3. **Taxation and Policy Uncertainty:** There is no clear policy on how EVs will be taxed or levied in comparison to non-EV vehicles, leading to uncertainty for potential buyers.
4. **Global and Local EV Policies:** While many countries are moving toward banning combustion engine vehicles by 2035, Australia has not committed to this. However, the Australian Capital Territory (ACT) has signed agreements supporting this transition. The Australian Climate Council has recommended a ban on combustion vehicles by 2035.
5. **Preference for Hybrid Vehicles:** Many respondents observe that hybrid vehicles are already popular in the rideshare market, with a general preference for them over fully electric vehicles, as hybrids are perceived to be more practical and reliable for rideshare services.
6. **Support for EVs in Rideshare:** Some drivers who use EVs for rideshare highlight significant operational benefits, although they acknowledge limitations such as charging times and range, which might make EVs less suitable for the taxi industry.

7. **Potential for Battery Improvements:** There is optimism that battery technology will improve by 2035, addressing current concerns about charging times and range, especially for taxis.
8. **Renewable Energy Opportunity:** South Australia often has an excess of renewable energy during daylight hours. This could be harnessed for charging EVs, benefiting point-to-point transport services.
9. **Uber's EV Incentives:** Uber has provided discounted commission rates for EV drivers, but this incentive is set to end in mid-2025. Additionally, Uber's upcoming vehicle reclassification process may remove many EVs from premium ride options, which could discourage further adoption of the technology.
10. **Need for Further Incentives:** Respondents suggest that adopting energy-efficient vehicles will require collaboration and further incentives. They believe that, as technology improves, the shift to green vehicles should happen more naturally.
11. **Hybrid Vehicles on All Platforms:** Some respondents advocate that hybrid cars, not just fully electric or petrol vehicles, should be permitted across all rideshare operator apps to avoid overburdening the electricity grid.
12. **Battery Replacement Costs:** There is concern about the high cost of replacing EV batteries, with some respondents indicating that battery replacement can be as expensive as buying a new car.
13. **Distrust of Foreign EVs:** Some respondents express a reluctance to use EVs manufactured in certain countries, particularly China, fearing Australia has become a dumping ground for foreign vehicles with inadequate battery technology.

RECOMMENDATION 27: Investigate options for implementing sector wide driver training to improve service delivery and passenger safety standards

- Agree/disagree with recommendation (average response): Agree

Summary of responses on the recommendation:

1. Current Training:

- Rideshare companies offer online training addressing industry-specific issues, but there is no formal requalification or recertification process.
- Additional online training is sometimes provided for specific concerns (e.g., assistance animals), but there are no practical or defensive driving courses.

2. Support for Defensive Driving:

- Some respondents believe that defensive driving training is important, particularly for safety, and there is strong support for introducing such skills, especially from those with law enforcement backgrounds.

3. Administrative Burden:

- Concerns were raised about the potential administrative overhead of introducing new training requirements, given that there are over 6,000 accredited rideshare drivers in Adelaide operating across multiple platforms.

4. Tourism and Local Knowledge Training:

- To enhance the experience for visitors and support tourism, there is a suggestion for the SA Government to offer “City Greeters Training” sessions for rideshare drivers a few times a year. This would equip drivers with knowledge of local tourism and historical sites, benefiting both the council and local businesses.

5. Language Barriers:

- Language comprehension among drivers was identified as an issue, with a suggestion that training programs or cheaper services for non-English-speaking customers might help address this concern.

6. Criminal History Checks:

- There was a call for more rigorous background checks, particularly for drivers who have recently arrived from overseas. It was suggested that their criminal history from their home countries should be checked alongside local assessments (e.g., Working With Children Checks).

7. Targeted Training:

- Respondents emphasized that while training is needed, it should be targeted towards those drivers who require it, with a focus on service quality and customer treatment.

RECOMMENDATION 28: Maintain current driver's licence tenure requirements

Under South Australia's current regulatory framework, driver accreditation requires the applicant to hold an appropriate driver's licence.

- Agree/disagree with recommendation (average response): Neutral/Don't care

Summary of responses on the recommendation:

1. **Safety Concerns:** A respondent, citing their background in law enforcement, emphasizes the importance of road safety and believes that greater practical driving experience is crucial. They support a minimum of 12 months of holding an appropriate driver's license.
2. **Employment Competition:** Another concern raised is about international students driving for Uber, potentially impacting local job opportunities. If the government allows short-term full license holders on the roads, it could lead to higher unemployment rates for Australians seeking part-time work as rideshare drivers.
3. **General Agreement:** There is a general agreement among respondents on the need for careful consideration of driver accreditation requirements.
4. **Background Checks:** It is suggested that drivers new to Australia should undergo overseas criminal checks, along with any necessary Working with Children Checks (WWCC).
5. **Testing for Overseas Licenses:** Respondents argue that having an overseas license should not automatically qualify someone for an Australian license. They emphasize the importance of testing, which should be funded by the applicant.

Overall, the responses highlight a strong focus on safety, local employment concerns, and the need for thorough background checks and testing for international drivers.

RECOMMENDATION 29: Ensure we future proof the regulatory arrangements for the point-to-point industry

- Agree/disagree with recommendation (average response): Agree

Summary of responses on the recommendation:

Responses suggest implementing a periodic review of the regulatory framework, emphasizing the importance of stakeholder involvement through annual meetings. Additionally, a regular review of the Act every three years, without the detailed requirements of previous reviews, is proposed as a suitable approach to ensure the regulatory arrangements remain relevant and effective.