

SUBMISSION TO
Office of the Tasmanian Economic Regulator
Taxi Fare Methodology Inquiry

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Definitions

ATIA: Australian Taxi Industry Association

CIE: Centre for International Economics

DIER: Department of Infrastructure Energy and Resources

Victorian Final Report: *Final Report Customers First, Service, Safety Choice: Taxi Industry Inquiry*

NCOSS: New South Wales Council of Social Service

OTTER: Office of the Tasmanian Economic Regulator

Serious mental illness: the spectrum of psychotic disorders such as schizophrenia, affective disorders such as bi-polar disorder and depression and severe and disabling anxiety disorders.

TAS: The Tasmanian Government's Transport Access Scheme which provides a 50% concession on the cost of travel by non-wheelchair accessible taxi. The purpose of the scheme is to enable age and disability pensioners to have 'independent access into the community'.

TasCOSS: Tasmanian Council of Social Services

Transport disadvantaged Tasmanians: people who have difficulty getting to where they need to go due to age, illness, disability, or financial constraints, particularly those who are geographically isolated. Lack of mobility is detrimental to their physical and mental health and restricts their access to education, training, and employment – all issues with implications for social inclusion and the social and economic development of Tasmania.

WAT: Wheelchair accessible taxi

Executive Summary and Recommendations

Executive Summary

Anglicare Tasmania welcomes the opportunity to respond to the Office of the Tasmanian Economic Regulator (OTTER) Consultation Paper concerning taxi fares in Tasmania. Anglicare's submission aims to give the perspective of Tasmanian community members who may be on low incomes, people with disabilities, people with mental illness, and people who are older.

From the experience of Anglicare's clients and staff and research, Anglicare knows that this group of people relies on taxis for essential transportation. They need taxis to provide short trips to appointments, work, enable contact with relatives, and get essential items. They need taxis to be affordable, available for pre-booking, reliable, willing to make short trips, and available to pick them up in outer-metropolitan or regional areas. In many parts of Tasmania, even greater Hobart, there are no bus services during the day, so taxis are relied upon as public transportation.

Anglicare agrees with the Centre for International Economics (CIE) that there is a need for certainty of taxi fares and that the taxi consumer should be at the centre of this discussion (OTTER 2013, pp. 11-12). But before any changes are made, Anglicare urges OTTER to conduct a thorough assessment of the taxi industry in Tasmania. We note that although the CIE reviewed international and national practices, but other models can not be applied without understanding the industry locally (OTTER 2013, p. 11). Anglicare urges OTTER to research who are taxi consumers, how they use taxis, how it varies in different locations, and how taxis contribute to the public transport system in Tasmania. With this information, Anglicare believes OTTER could more effectively set fares, make regulations, and respond to changing taxi usages into the future.

The Consultation Paper focuses on the economics of taxi fare prices, but it seems to lack any assessment or questions regarding the role of taxis in Tasmania and the social impact of any fare changes. Anglicare recommends OTTER conduct a social impact assessment¹ with the amended fares in mind.

Anglicare's responses to the Regulator's consultation paper are contained in this document. However, four recommendations fall outside the framework of the consultation and are listed below.

Recommendations

1. That the Regulator order an analysis of the taxi industry in Tasmania, with the analysis to cover the demographics of taxi consumers, patterns of usage across demographics and locations, and how taxis contribute to the public transport system in Tasmania.
2. That the Regulator order an analysis of the social consequences of changes in fares (a social impact assessment) with recommendations for monitoring and management.
3. That the Regulator request that the Department of Infrastructure, Energy and Resources undertake a campaign to promote the Transport Access Scheme to eligible Tasmanians.

¹ Social Impact Assessment: the process of analyzing, monitoring, and managing the intended and unintended social consequences, both positive and negative, of planned interventions (policies, programs, plans, projects) and any social change processes invoked by those interventions (SIA hub 2013).

4. That the Regulator investigate other models and incentives for taxis to be accessible for short trips, and in regional/outer suburban areas (for example shared ride and fixed route services).

About Anglicare Tasmania

Anglicare Tasmania is the largest community service organisation in Tasmania, with offices in Hobart, Glenorchy, Launceston, St. Helens, Devonport, and Burnie and a range of outreach programs in rural areas. Anglicare's services include emergency relief and crisis services, counselling and family support, accommodation support, employment services, mental health services, acquired injury, disability and aged care services and alcohol and other drug services

For people isolated in the community and reliant on taxis, Anglicare's disability, aged care, and mental health services provide direct support and connection to the broader community. This submission draws upon the experience of staff in these services.

Alongside service provision, Anglicare's Social Action Research Centre (SARC) conducts research, policy and advocacy work with a focus on the needs of Tasmanians on low income. Recent SARC work highlighted the importance of taxis to low income people, older people dependent on low fixed incomes, people with disabilities, and people experiencing mental illness. These research reports include: *My Life as a Budget Item: Disability, budget priorities and poverty in Tasmania* (Hinton 2006), which explored the circumstances of the working age population of people with disabilities living on low incomes in Tasmania; *Forgotten Families, Raising children with disabilities in Tasmania* (Hinton 2007), which documented the daily lives of families with disabled children from across the state who are living on low incomes; and *Thin Ice: Living with serious mental illness and poverty in Tasmania* (Cameron & Flanagan 2004), which investigated the lives of Tasmanians with serious mental illness living on low income from the perspective of both people living with the mental illness and their families. This report explored the interconnections between poverty and serious mental illness and the compounding effects of this experience.

This submission is informed by this research, the experience of Anglicare staff, and similar inquiries interstate.

Introduction

The taxi industry in Tasmania is part of the broader transport network and meets a variety of needs for a variety of consumers. From Anglicare's understanding the Tasmanian taxi industry is probably unique among mainland capital cities and regional areas, so it needs to be examined thoroughly to ensure the best outcome for taxi companies, drivers, and consumers.

In preparing this submission, Anglicare Tasmania found there was a lack of information about the Tasmanian taxi industry more broadly. Anglicare understands there is currently an inquiry into Wheelchair Access Taxis (WATs) happening and more work is being done on the overall transport system in Tasmania. Anglicare urges OTTER to take a step back and piece all this information together before changing the fare structure, particularly adding tariffs and booking fees.

The role of taxis in the transport system has changed significantly over the years. In the past in Tasmanian cities people could rely on buses and trams, and people travelled less frequently and for lesser distances. Today cities are car reliant, people are expected to travel more in their daily lives, and public transport systems have dropped away. Taxis in Tasmania provide transport not only for the tourism and business

industries, but increasingly for people who have no other means of travel and are dependent on taxis for participation in everyday life – work, education, medical appointments, social contact, and so on. This submission attempts to raise their concerns.

Anglicare services relevant to this submission include those working in the community with older people and people with disabilities, and mental health services. . Anglicare consulted both with service staff and SARC research in these areas for this submission. Many of Anglicare’s clients could be described as transport-disadvantaged and therefore reliant on taxis or transport from other people. Public transport is often not an option because of mobility, fear, and access (location and regularity) and while community transport provides a valuable contribution it does not suit short or regular trips. Taxis are the only transport service that provides point-to-point, 24-hour, seven day week transportation.

The cost of taxi fares does affect access to taxis for our clients. Many of the people dependent on the low fixed incomes available through Centrelink are people who are older and receiving the Age Pension (and who may be frail) and people living with disabilities (physical disabilities or mental ill health). These people manage on very low, fixed incomes. Anglicare research and workers indicate that these clients tend to allocate money for taxis for essential trips. If these fares go up or a trip is unusually expensive, they then do not attend appointments or have to go without something else.

We urge OTTER to take into account this portion of the taxi market – low income and disadvantaged clients – in setting fares and to give the taxi industry the flexibility needed to meet the needs of this part of the broader community.

Issues facing this Inquiry

Anglicare Tasmania recognises that the taxi industry is a commercial endeavour. However, we would like to see fare structure reflect both the ability of customers to pay and also ensure taxi drivers receive a decent wage. However, there is a lack of information for us to use to recommend how this can be achieved in Tasmania. This data may exist but if so, it is not readily accessible. In completing this submission Anglicare consulted the DIER Library, Service Tasmania, various taxi industry websites and the ABS, but could not find any data on the make up of taxi users in Tasmania. Anglicare reiterates the point made in a TasCOSS Submission to the Review of Taxi License Release Arrangements earlier this year, that there is a lack of information about the taxi industry, taxi drivers and taxi consumers (TasCOSS 2013).

There is also a need to understand the whole transport industry in Tasmania: the role of buses, cars, community transport, taxis and other forms of transport. This would enable an assessment of the demand for taxis, identification of any gaps in service, and innovative ideas to ensure the viability of taxi companies and to meet the needs of taxi consumers. The Victorian Government has just completed such work and the final report, *Final Report Customers First, Service, Safety Choice: Taxi Industry Inquiry* (Victorian Final Report) had a range of recommendations for different sectors of the state, some of which may be relevant for Tasmania. For example, it noted the expanding market generated by the aging population and the need for taxis to integrate with community and public transport systems. It also noted that 52 per cent of taxi users do not use taxis more often because of the cost (Victorian Final Report, p. 193). We suspect that a lot of this information would be applicable to Tasmania and this Inquiry.

The NSW Independent Pricing and Regulatory Tribunal (IPART) has requirements to take into account the social impact of any changes it recommends for its portfolio, which includes the taxi industry (NCOSS 2006, p. 8). Anglicare urges OTTER to do likewise with a social impact assessment of any fare changes. The placement of the customer at the centre of the fare structure is commendable, but an understanding of who these customers are is necessary to ensure fares are appropriate.

Anglicare therefore recommends that the Regulator order an analysis of the taxi industry in Tasmania, with the analysis to cover the demographics of taxi consumers, patterns of usage across demographics and locations, and how taxis contribute to the public transport system in Tasmania.

Anglicare further recommends that the Regulator order an analysis of the social consequences of changes in fares (a social impact assessment) with recommendations for monitoring and management.

Response to Discussion Paper comments

Section 3: Objectives

OTTER seeks stakeholder comments on the CIE's proposed objectives of taxi fare regulation in Tasmania.

Anglicare supports the consumer focus of the CIE's proposed objectives. Although taxi companies are small businesses that need to make a profit and provide attractive incomes for drivers, they do contribute to Tasmania's public transport system and this is where Anglicare sees the need for fare regulation.

Service Tasmania's Passenger Transport Services Branch reports that as of March this year 17,023 people have access to the Transport Access Scheme (TAS) for standard taxi concessions and 1,890 for wheelchair concessions², making up 24,913 Tasmanians or approximately five per cent of the population.³ Anglicare's research has suggested that the assessment process for the TAS is focussed on the needs of people with impairment to their physical mobility. People who are poor and unable to utilise public transport because of social phobias, disorientation or other aspects of serious mental illness are at risk of not be assessed as eligible for TAS. In addition, few of the participants in Anglicare's research into the experience of Tasmanians with serious mental illness had heard of the Transport Access Scheme (Cameron & Flanagan 2004, p. 55). It is therefore possible that the number of Tasmanians who need taxis for transport is actually greater than five per cent.

In addition, the Victorian Final Report found that the cost of taxi fares was more than many consumers could afford. It reported that 52 per cent of Victorian taxi users would use taxis more if they were cheaper and that the demand for taxis among some groups of customers is strongly affected by price, notably young people, people with disability and people on low incomes (Victorian Final Report, p. 193). Anglicare's research and service experience suggests that a similar response to these questions would be found in Tasmania.

Anglicare's research shows that taxis are used by transport disadvantaged Tasmanians, including older people, people with disabilities, and people with physical and mental illnesses who are often living on low incomes and that any taxi fare increases will have dramatic flow-on effects to their budget, their general health and wellbeing and their ability to connect socially to their community and attend essential appointments (Cameron & Flanagan 2004; Hinton 2006; Hinton 2007). This finding is supported in the Victorian Final Report: eight per cent of Victorian taxi users have limited transport options and 'Without access to the point-to-point service provided by taxis, many of these Victorians would be unable to access employment, health and other services or social and recreation activities' (Victorian Final Report, p. 49). The Victorian Inquiry also found that rural and regional customers use taxis differently because public transport is more limited and are more likely to book taxis in advance (Victorian Government 2012a, p. 49). Anglicare suspects Tasmanians' taxi usage would be more like rural and regional areas of larger states and

² Hazelwood, E [Department of Industry, Energy and Resources] 2013, pers. comm., 7th March 2013.

³ According to the Department of Treasury and Finance, at the end of the 2012 June quarter Tasmania's population was 512,000 ([http://www.treasury.tas.gov.au/domino/dtf/dtf.nsf/LookupFiles/Population.pdf/\\$file/Population.pdf](http://www.treasury.tas.gov.au/domino/dtf/dtf.nsf/LookupFiles/Population.pdf/$file/Population.pdf)).

we would also have a higher percentage of the population with limited transport options. This needs to be reflected in the objectives of the fare structure in Tasmania.

Anglicare therefore suggests adding a fourth dot point to the objectives of fare regulation to recognise the particular needs of people living on marginal incomes in rural and remote areas with poor, or no, access to transport.

Section 4.1: Higher flagfall

Is access to taxis within suburban areas an issue for stakeholders?

Yes, access to taxis within suburban areas is a problem for Anglicare clients. Our workers and research support the Regulator's reasoning, that taxis are often called to these areas to do short trips, but these trips are vital for the customers, taking them to shops, work, the pharmacy, or doctor (Hinton 2006, pp. 97-98). In addition, in TasCOSS's February submission to the Review of Taxi License Release Arrangements it noted 'TasCOSS has heard disturbing accounts of taxi drivers refusing to accept passengers wishing to travel to disadvantaged areas of Hobart and Launceston (Bridgewater, Ravenswood) (TasCOSS 2013).

Taxis provide a unique and vital service for our clients. In many outer-metropolitan and regional areas public transport is limited to work times or is non-existent. It is limited in its accessibility to older people, people with disabilities, or people with a mental illness. Similarly the community transport schemes usually involve day trips with a number of passengers meeting multiple needs. Taxis can provide short trips for individuals to get quick, essential jobs done. Taxis also provide seven-day and 24-hour service which the community access schemes do not. The Victorian Final Report recommended in circumstances where bus services are not commercially viable taxis could be funded as an alternative or complement to community and public transport (Victorian Final Report, p. 193).

Suburban areas are also where many of Anglicare's clients reside and access is vital. Anglicare recognises TAS is available for people with physical disabilities and people who are mentally ill to assist taxi availability. However, as noted above, Anglicare has concerns about the accessibility of TAS to people with mental illness.

Should the flagfall charge be raised (and the distance-based charge reduced in proportion) to encourage more drivers to operate within suburban areas?

In the absence of an analysis of taxi usage in suburban areas and the possible effects of such changes to flagfall charges, the following response is based on the experience of Anglicare staff and research.

Anglicare is concerned about any modifications to the pricing structure which might result in increases in taxi fares. Anglicare clients are often more influenced by price than accessibility as they are living on budgets and constantly deciding what they can go without. Some clients are completely dependent on taxis (for example WATs) for transport and already wait long periods for pre-booked taxis. These are people who already live with very poor accessibility to both transport and their community. What dictates whether or not they actually use the taxi is a complex array of financial issues – for those who require a support worker to travel with them, being able to afford the support worker's time and being able to afford the taxi fare are two compelling matters. At their current level taxi prices are largely unaffordable, and mean these clients miss essential medical and work appointments and become socially isolated (Hinton 2006, pp. 97-98). Higher prices would mean people would go without transport for longer periods of time, and increase their level of social exclusion.

Anglicare urges the Regulator to come up with another incentive for taxis to be accessible for short trips and in regional/outer suburban areas. The Victorian Final Report explored some different models and incentives for rural and regional Victoria. These included allowing shared ride and fixed route services in areas lacking public transport (Victorian Final Report, p. 15 & p. 191). These may be applicable in Tasmania too. Currently it seems the *Taxi and Luxury Hire Car* legislation limits the ability of taxi companies to be innovative, so there may be need for legislation change to enable this (TasCOSS 2013).

Anglicare therefore recommends that the Regulator investigate other models and incentives for taxis to be accessible for short trips, and in regional/outer suburban areas (for example shared ride and fixed route services).

Section 4.2: Booking fee

Do stakeholders see the need for a booking fee in Tasmania?

No. Anglicare is concerned that this is an additional financial impost on consumers which may reduce their access to taxis. As 80 per cent of taxis are pre-booked in Tasmania (Discussion paper) it seems excessive to add a booking fee. The Victorian Final Report supports this, concluding that when the majority of taxi users are pre-booked taxis, adding a booking fee becomes a disincentive to consumers and also restricts innovation by service providers (Victorian Final Report, p. 196). Rather than the introduction of a booking fee, the Victorian Final Report recommended that in regional areas taxi companies should be permitted to have a fare system of maximum fare regulation, 'with a price notification and publication system' (Victorian Final Report, p. 207). Anglicare understands Tasmania already operates with a maximum fare model, so the Victorian recommendation simply mean ensuring these maximum fares were publicly available.

Section 4.3: Tariff 2

Do stakeholders believe that a Tariff 2 is required in Tasmania?

The CIE's summary of evidence from other states suggests that Tariff 2 is not needed in Tasmania. The CIE argues that the evidence from other states suggests that the relationship between the level of fares and drivers' compensation is weak and potentially eroded by a range of factors.

It would appear that higher tariffs do not benefit either the industry or the clients. From the perspective of low-income and transport-disadvantaged Tasmanians, Anglicare supports this conclusion. Transport disadvantaged Tasmanians who need taxis at night time or on weekends are often using taxis to make essential trips and are already rationing their usage.

Section 4.4: Tariff 3

Should a Tariff 3 be introduced into the fare structure?

Anglicare is supportive of a better targeted tariff structure that compensates drivers for doing undesirable shifts but does not make it so expensive that people do not use taxis. The Australian Taxi Industry Association (ATIA) produces tables comparing the different taxi fare structures each year (ATIA 2011) (see below). This table shows that Tasmania's fares are not expensive compared to other states, but Tariff 2 does apply for a longer period of time than the other states. Anglicare recommends further modelling of the idea of abolishing the current Tariff 2 and instead putting in place a tariff that only applies for a reduced, more targeted time.

Table 1. 2011 State and Territory Statistics (as at 31 December 2011) (ATIA 2011)

2011 YEAR	NSW	VIC	QLD	SA	WA	TAS*	ACT	NT	AUST
Taxi Licence	\$425,000	\$480,000	\$437,000	\$388,040	\$300,000	\$153,000	\$280,000	NA	\$415,600
No. of Taxis	7,009	5,256	3,257	1,272	2196	553	297	167	20,007
% of Aust Total	35.0%	26.3%	16.3%	6.4%	11.0%	2.8%	1.5%	0.8%	100.0%
2011 Year	NSW	Vic	QLD	SA	WA	TAS	ACT	NT	Aust
Monthly Radio Dues (average)	\$600	\$550	\$721	\$612	\$585	\$485	\$951	\$750	\$609
Flagfall T1	\$3.40	\$3.20	\$2.90	\$3.50	\$3.90	\$3.40	\$4.70	\$4.10	\$3.35
Flagfall T2	\$3.40	\$3.20	\$4.30	\$4.90	\$5.70	\$3.40	\$4.70	\$4.90	\$3.87
Flagfall T3			\$6.30	\$4.50	\$5.70	\$3.50			
Flagfall T4				\$6.40			\$3.50	\$1.46	
Rate/km T1	\$2.06	\$1.62	\$2.06	\$1.69	\$1.59	\$1.84	\$1.90	\$1.79	\$1.86
Rate/km T2	\$2.47	\$1.94	\$2.06	\$1.85	\$1.59	\$2.20	\$2.19		\$2.10
Rate/km T3	(City)	(Metro)	\$2.06	\$2.19	\$2.36		\$1.43		
Rate/km T4				\$2.41			\$1.64		
Wait time / hr (\$)	\$53.33	\$34.00	\$45.60	\$36.5/\$47.4	\$45.70	\$36.00	\$49.50	\$50.80	\$44.88
Phone Booking Surcharge	\$2.30	\$2.00	\$1.50	Nil	\$1.50	Nil	Nil	nil	
After hours surcharge	T2 10pm-6am Sun-Mon (+ Sun & pub hols in country areas)	T2 Midnight-5am +20% on wait time & distance payable to drivers (Metro/Outer Suburban only) \$3.00 (midnight to 6 am) Country Urban zones	T1 7am-7pm Mon-Fri except pub hols, T3 midnight-5am Mon-Sun, (except ANZAC Day), T2 all other times	T2 7pm-6am Mon-Fri, wkends & pub hols	T2 6pm-6am Mon-Fri, wkends & pub hols, \$2.50 Fri/Sat ultra peak surcharge midnight to 5am, \$4.75 Xmas Day, \$5.35 NYE,	\$2.60 for journeys originating outside metropolitan areas between 12.30 & 5 am. Tariff 2 applies 8 pm to 6 am weekdays, all day weekends & Public holidays	T2, T4, T6 & T8 9pm - 6am Mon-Fri, Wkends & Pub Holidays	T2 6pm-6am Mon-Fri wkends & pub hols	

Section 4.5: Deregulation of fare components

Do stakeholders consider that a deregulated fare structure may be appropriate for the taxi industry in Tasmania?

The argument set out by the CIE, based on the experience of the Australian Energy Regulator, does not seem to match the relatively small Tasmanian taxi industry. A better comparison for discussion might be the taxi industry of regional Victoria. The Victorian Final Report does suggest a deregulated fare structure could work for regional parts of Victoria (Victorian Final Report, p. 196).

The Victorian Inquiry suggests in regional Victoria taxis are known by consumers and rely on repeat business and relationships, so they are best placed to set their fares and be innovative to respond to local needs. It recommends that in this environment, fares could be deregulated, but taxis would still be required to report fares to the regulator and other mechanisms could be adopted to regulate the market such as license regulation (Victorian Final Report, pp. 196-200).

Anglicare is concerned that deregulation could mean greater ability for taxi companies to avoid providing transport for outer-metropolitan areas, certain suburbs and certain clients, and that this would be disastrous given the important role taxis play in the transport network. Anglicare recommends that if OTTER is considering deregulation it does further investigation into taxi fare structures in Australia and how deregulation applies in markets of similar size to Tasmania.

As the next part of this question suggests, fare deregulation may be applicable for smaller towns where there is only one taxi provider, but further data on the nature of the taxi industry in Tasmania is needed.

Section 4.6: Fare notification

[Do stakeholders believe that there are sufficient competitive forces in the Hobart and other \(non-Launceston\) markets to consider adopting a price notification system?](#)

The discussion paper and the Victorian Final Report suggest that public notification of maximum fares would be a good idea. It would enable budgeting and give passengers confidence in the fee charged by the taxi driver. However, this question asks about competitive forces in markets, and this needs information about taxi passengers and usage to answer accurately.

Section 7.1: Initiation of reviews

[Do stakeholders agree with the CIE's recommendation that reviews should be initiated periodically by the price setting agency?](#)

Anglicare supports the establishment of a system whereby periodic reviews by OTTER or DIER happen at regular intervals. Anglicare is concerned at the potential for price shocks for low income customers who are dependent on taxi services, which may happen if price increases are irregular.

Section 7.2: Length of regulatory period

[Do stakeholders agree with the CIE's recommendation that a major review should be conducted every four years with fares adjusted mechanically by the cost index each year?](#)

Anglicare does not have any comment to make on the indexation question. However, the suggestion of regular reviews and price adjustments is a positive one, given our concerns about customers who have low, fixed incomes and little market choice. Therefore, Anglicare recommends OTTER conduct a thorough baseline review of the industry now and conduct a four yearly review from completion of the baseline review.

Section 7.4: Consultation during reviews

How much consultation would stakeholders like during major reviews?

Anglicare supports consultation with the community during major reviews.

Do stakeholders agree with the CIE's recommendations on consultation?

Anglicare supports a shortened process based on the CIE model. As there is no consumer body representing the interests of taxi users to attend public consultations, Anglicare believes that a shortened process, such as one round of written submissions and a draft and final report, would be sufficient.

Section 7.5: Agency undertaking the review

Who should undertake taxi fare regulation?

Anglicare agrees with the CIE that the review needs to be independent. Different agencies may be relevant depending on the timing and focus of the review.

Section 7.6: Funding future reviews

Subject to the adoption of the review process recommended by the CIE, in funding future reviews, are stakeholders supportive of licence fees being increased to fund those reviews if required?

DIER should fund the review, as the review is looking at the taxi industry as part of Tasmania's transport and infrastructure system.

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