

## Bus & Coach Industry Briefing Paper on Policy and Advocacy Directions and Current Issues

### BIC on the Road 2020

#### Bus Industry Confederation



May 12, 2020

#### Bus Australia Network



## Bus Industry Confederation

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## Bus Industry Confederation

### Overview of the Bus Industry Confederation

The Bus Industry Confederation is the peak national body uniting bus and coach operators, bus and coach chassis suppliers and manufacturers, bus and coach body manufacturers, suppliers and service providers. Its vision is to enhance the sustainability and liveability of Australia's cities and regions by *moving people* using bus and coach transportation. We aim to do this by representing the collective interests of our Members and to assist them in promoting the safety, efficiency and effectiveness of bus and coach transport in Australia.

The Bus Industry Confederation aims to:

- encourage investment in public transport infrastructure and services
- promote policies and actions that are environmentally responsible
- promote the development of a viable and improved bus and coach industry in Australia
- foster and promote a viable Australian bus manufacturing industry
- protect the business interests of operators, manufacturers and suppliers
- promote public understanding of the contribution made by the bus and coach industry to Australia's economy, society and environment
- ensure the accessibility and mobility needs of Australians are met, regardless of where they live or their circumstances
- promote the use of public transport as a viable alternative to the car
- coordinate and make more effective existing federal, state and local government policies and programs that relate to passenger transport
- ensure that buses and coaches operate safely and effectively.

### Purpose of this Document

The purpose of this document is to report on the bus and coach industry to state and federal government ministers, shadow ministers, senior officers in various Departments involved in transport, planning, roads, infrastructure and cities portfolios. This report would usually form the basis for a meeting agenda in a face to face environment across Australia with the BIC Chairman and BIC Executive Director. During this current period of pandemic disruption, this traditional BIC on the Road report is in effect a virtual BIC On the Road. Communication on this report can be sent to Michael Apps, Executive Director – Bus Industry Confederation at: [appsm@bic.asn.au](mailto:appsm@bic.asn.au). The BIC office remains in operation and will attend to phone calls at this number: 02 6247 5990.

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### RESEARCH WORK PROGRAM 2019-2022

The Research Work Program 2019-2022 was agreed by the BIC Council on 4 April 2020 and is available on request.

Key research publication recently released or for release in 2020/21 include:

- > Policy Paper 11 – Released 2019.

*Moving People in the Future: Land passenger transport and “new” mobility technology* was published in June 2019. The substance of this report formed the foundation of the BIC submission to the House of Representative Inquiry into Automated Mass Transit. The BIC appeared as a witness to this committee in February 2019. The Hansard record of the evidence provided by the Executive Director is available on request.

- > *Moving People - The Bus and Coach Industry Australia – A Snapshot.*

The BIC has commissioned ITLS Sydney University to undertake a report that provides a 2020 snapshot of the Australian Bus and Coach Industry. A strategic launch of the report will take place in 2020.

- > *BRT, BRT Lite and Branded Bus Services (BBS) – from Workhorse to Thoroughbred – Australian Case Studies – Released 2019.*

- > *A Cities Report looking at Federal Government House of Representative and Senate Inquiries from 2017 to 2020.*

### FEDERAL ELECTION PRIMER 2019

The BIC released a Federal Election Primer prior to the 2019 Federal Election titled *Moving People, Cities, Regions and the Federal Government*. The following is an extract from the published version that provides a series of recommendations and ideas for all Governments consideration in this term of the Federal Parliament.

## Bus Industry Confederation

### Moving People, Cities, Regions and the Federal Government

Australians love their cars, and this dependency has created challenges not only in our cities but in regions, towns and villages as our population increases and major regional centres grow.

The productivity, sustainability and liveability of our cities and regions is critical to the health of the Australian economy and the quality of life of Australians.

Public transport in our cities and regions plays a vital role in meeting the mass and social transit needs of the community and deliver important government policy outcomes.

Travelling in cars, especially single use trips provides personal mobility outcomes and personal space and time benefits but this comes with economic, environmental and community costs.

In the context of a fast growing population and increasing urbanisation, congestion is impacting on the economy, reducing our living standards and increasing the cost of living.

At the same time Australia's growing regional centres are entertaining the same transport problems of our growing cities 20 years ago and surrounding towns and villages are challenged with poor transport and mobility options, just as middle and outer suburbs of our cities are today.

All of this adds up to poor economic, environmental and societal performance.

This is the reason why the federal government has a strategic and leadership role to play in our cities and regions future transport choices and public transport.

The delivery of public transport services is the domain of state, territory and in some instances local government.

The federal government has a role to assist state, territory and local governments to deliver national policy outcomes.

There a number of national policy outcomes of better public transport services and improvements.

- > Urban productivity
- > Regional connectivity and decentralisation
- > Environmental improvement
- > Social inclusion
- > Improved personal health outcomes
- > Road safety benefits

It is not rocket science to understand what makes public transport and bus services attract more people to use it.

- > Frequency of services
- > Span of operating hours per day
- > Reliability

It is these three core fundamentals of public transport service delivery that the federal government should focus to assist state, territory and local governments to increase the number of services and patronage on public transport in the city and country and in doing so, reduce the number of individual trips taken by car.

This federal election primer outlines the Bus Industry Confederations ideas on federal policy and programs that will make a difference, be appealing to the electorate and form the foundation of a future Intergovernmental Agreement on Moving People.



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### 'Fair Go' Guarantee for Public Transport Users, Drivers and Manufacturers

The bus industry believes in a 'fair go' for all Australians. We believe that good infrastructure, human services and urban and regional policy hold the key to unlocking the enormous potential of our places and people

The federal government has a national strategic policy and program role to address the growing need for better public transport and mobility services in our cities and regions.

This is why we call on the federal government to adopt our 'Fair Go' Guarantee.

This policy delivers a 'fair go' for:

- Australian commuters through guaranteed service levels and fairer fares no matter where they live
- Australian businesses through the prioritisation of the Australian bus manufacturing sector and recognition of public transport as an essential service
- Australian workers through recognising the essential role that bus drivers play in our community.

### The 'Fair Go' Guarantee 10 Point Action Plan

**ACTION 1:** Develop an Intergovernmental Agreement on Moving People that will underpin the 'Fair Go' Guarantee.

**ACTION 2:** Introduce a Public Transport Users 'Fair Go' Guarantee based on Minimum Service Levels for Australia's bus networks to bring about a 'turn up and go' public transport paradigm as the centrepiece condition of federal government public transport and road infrastructure funding.

### PT Users - 'Turn Up and Go' Minimum Service Levels

	Weekday Services		Weekend Services	
	Frequency	Span	Frequency	Span
Inner/Middle Metropolitan Suburbs	15 min	5.30am – 10.30pm 17 hours	20 min	6.30am – 10.30pm 16 hours
Interface Suburbs	20 min	6.00am – 10.30pm 16.5 hours	30 min	6.00am – 10.30pm 15.5 hours
Major Regional Centres	30 min	6.00am – 9.30pm 15 hours	45 mins	7.00 am- 9.30pm 14 hours
Regional Areas	30 min	6.00am – 7.30pm 13 hours	60 mins	8.00am – 7.30pm 11 hours

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**ACTION 3:** Prioritise improved bus services in Australian cities' outer suburbs as part of City Deals/partnerships and other means where network coverage, service frequency, operating hours and integration with other modes of public transport is poor in comparison to inner/middle suburbs.

**ACTION 4:** Invest in high capacity bus service infrastructure such as bus rapid transit to link population centres with employment and activity clusters to augment other services and fill rail network gaps.

**ACTION 5:** Introduce new and expand existing funding program(s) to improve regional and rural public transport through better integration with existing public transport and other transport services that includes strong tourism infrastructure and service links.

**ACTION 6:** Improve regional connectivity and accessibility through better utilisation of existing regional transport assets and services and the establishment of Regional Accessibility Committees to achieve this.

**ACTION 7:** Provide incentives to states and territories to improve travel to learn and school bus services and provide financial incentives for parents to make school bus travel part of daily travel plans as a key congestion busting strategy.

**ACTION 8:** Provide investment incentives to promote eco - electro bus mobility to renew the Australian bus fleet by retiring Euro 3 and below emission standard buses and replacing with Euro 6 diesel, hybrid or electric buses that includes 'A Fair Go' Guarantee for Australian manufacturers based on Australian content procurement requirements.

**ACTION 9:** Recognise public transport as an 'essential service' under industrial relations laws to minimise disruption to services and introduce 'A Fair Go' Guarantee for bus drivers to recognise bus drivers as essential service workers to improve driver safety.

**ACTION 10:** Exclude special school bus service provision from the NDIS and retain the skilled and mature regulated market that exists.



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### COVID 19

## Industry position on managing COVID-19

The Bus Industry Confederation (BIC) and the Bus Australia Network (BAN) have long presented the case for public transport services to be recognised as an essential service. The continuation of public transport services under current industrial relations laws is not guaranteed as a result of industrial action such as strikes and withdrawal of labour. Unlike the Qantas case several years ago, public transport is not recognised as an essential service, and the Minister has no “step in rights” to cease industrial action.

The BIC has argued for many years that public transport should be recognised in the Fair Work Act as an essential service. It is the BIC’s contention that if public transport services including bus public transport services, (buses carry more passengers per day than any other mode) are stopped due to industrial actions for any prolonged period, it will lead to **significant economic and social dislocation**. It should be noted that public transport is recognised as an essential service in a number of western developed economies.

### By Economic and Social Dislocation We Mean:

#### *Mass transit*

Public Transport is a mass transit provider and despite Australia’s relatively low patronage/passenger trips taken by public transport, about 8% to 10% of trips, public transport is a major contributor to keeping our cities and regions moving and managing the impact of congestion and its productivity impacts on the economy. If public transport was stopped overnight, cities that generate 80% of the value of Australia’s GDP would grind to a halt.

#### *Social transit*

Public Transport is a social transit provider and provides a vital link to people who are less well off, without a car, cannot afford a car, cannot drive or don’t have a license; public transport *moves people* to connect to services, employment, education, social and recreational activities that are important to an individual’s social well-being and their contribution to the economy and society. If public transport was stopped overnight a large part of the population would be socially isolated and the health impacts of this would be have a significant impact on the economy and community.

The disruption of mass and social transit on a large scale as a result of industrial action or a health crisis such as the Covid-19 pandemic, demand that public transport is recognised as an essential service and the appropriate action be taken for public transport to continue to operate.

In the case of the Covid-19 pandemic, how public transport can continue to operate and minimise health risk for bus drivers and bus passengers is the key issue at hand that involves state and territory contractual arrangements, bus service operational issues and health risk and management issues.

This is explored further below with an industry perspective for all governments to consider immediately in the case of the current pandemic and put in place an essential service strategy for public transport going forward.

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### Route and school bus services – government contracted services

Government contracted public transport services include route or commuter services in our cities and regions that involves high and low volume passenger services related to where the services are provided and the time of day/night and school bus services.

#### Key Proposals for safe service operations of buses

- **Temperature testing** of drivers and staff.
- **Drivers offered to wear effective masks.**
- **No cash payments**
- **Rear and middle door entry** where available.
- **A conductor to be introduced** as a temporary measure on all city services and peak town services to manage passenger numbers and seating and cleaning of hard services on bus.

#### Key Proposals for business assistance of bus operations

- **Suspension of the Road User Charge (RUC)** component of fuel excise for buses and coaches. This would mean a full rebate of fuel excise paid for fuel used for the purposes of bus and coach travel as applies to miners and farmers operating off road. Currently fuel excise is 43.2 cents per litre of which buses and coaches and Industry can claim approximately 27.3 cents per litre as a rebate and the difference is the RUC which is currently frozen at 25.8 cents per litre. **Industry is seeking government to continue with the proposed suspension of the RUC due to Covid-19 and for an agreed period of time (no less than 6 months), after return to normal services.**
- **Suspension or waiving of government fees, taxes and charges** (mainly state based) such as payroll tax, registration fees and certificates of insurance fees.
- **Suspension of road tolls** for buses and coaches for an agreed period.

#### Key Principles for bus service contracts

A number of temporary working arrangements (principles) could be considered to enable bus operators and relevant authorities to be responsive to the changing and foreseeable Covid-19 scenarios.

**A starting point in recognising public transport as an essential service is that the continuation of bus services and timetable arrangements is assured in some form depending on the circumstance.**

The continuation of services in the context of COVID 19 based on patronage and social distance measures could mean:

- consideration of increasing bus services in peak commute periods, where patronage levels are still high, by running more frequent services or another bus on the same timetable to split passengers per bus/social distance.
- in the case of patronage decline maintain the peak hour commute timetable and reduce frequency of off-peak services to one hour.
- consider as a last resort, holiday or weekend time-tables based on declining patronage.
- school services to operate until such times as schools are shut down.

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The following principles are suggested but may vary dependent on differing contractual arrangements in each state and territory. These principles should form the basis for discussion between state associations, bus operators and relevant authorities.

*Review and agree the processes required to:*

- implement any restrictions, alterations and cancellations of services
- deal with circumstances where a bus operator is unable to deliver services due to COVID-19 related issues
- provide ongoing support by the Authority for bus operators and their employees who may otherwise be adversely affected through loss of income
- establish arrangements for ongoing consultation with bus operators and monitoring, including any proposed temporary arrangements put in place
- implement temporary arrangements consistent with the requirements for variations under Bus Service Contracts.
- consider an agreement by the parties to treat the COVID-19 Emergency as though it is a Force Majeure Event under the Contract on a State by State basis.
- more flexible work conditions that give to employers the ability to keep their employees gainfully employed whilst experiencing a downturn in service requirement.

### *The De-Regulated Sector – long distance, tour, charter and express services*

This sector of Industry has stopped like many other industries/businesses.

**No passengers means no tours and no charters** which is largely due to the obvious issues related to travelling on buses and coaches for extended periods of time and distance. This sector of Industry has gone into hibernation as a result of COVID 19. As examples, passengers are not undertaking:

- long distance tourism travel trips such as East Coast “hop on hop off” backpacker tours, around Tasmania coach tours or Coober Pedy outback opal tours
- express commuter service trips such as Murray’s Canberra to Sydney or South East Queensland, Brisbane to Toowoomba express commuter/connection services
- local/international tourism short tours such as Cairns Hinterland and the NSW Blue Mountains
- bus charter and school tours and excursions.

To expand on bus charter and school tours and excursion as an example of the impact of Covid 19, this sector exemplifies the local economic and social impact on the community and many ancillary small businesses that depend on the local tour and charter company across Australia, let alone the local tour and charter bus and coach business.

These businesses operate in every Australian city and country town servicing suburbs, regions and townships and districts and most continue to be family owned and run.

This sector of the bus and coach industry involves operators who provide for example, annual pre-booked school tours, excursions and charters to local school sporting events and local community charters.

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An annual pre-booked visit to Canberra to visit the Nation's Capital City icons including Parliament House through to visits to Darwin and the Red Centre form part of the curriculum of schools and planning for these coach charter businesses all over Australia. Most of these businesses have been founded on this core annual school business as their key and predictable revenue source year on year.

Some Canberra school charter tours are partly subsidised by the federal government who financially support schools as part of a National Civics Program. Other than this subsidy that goes to the school to partially cover the cost of the excursion, this sector does not receive any federal or state government financial support. This has been an unfortunate misconception of many schools who have refused to pay cancellation fees for these annual tours believing state governments provide financial support or argue reasonably that state governments are responsible for cancelling such tours due to Covid-19. These charter tours are in effect set annual bookings to fit in with the local school programs and curriculum, e.g. Year 5 go to Canberra, year 6 to the Red Centre.

Either way the school bus and coach charter business has found itself the "meat in the sandwich".

No matter the state or territory this form of excursion forms part of annual school curriculums and are effectively pre-booked each year with vehicles and staff locked into undertake these charters and no other bookings taken.

These businesses in our cities and regions were largely built on these "secure curriculum based tours" and when they are not doing these school tours they are the lifeblood of city and country communities taking footy teams and supporters to their games on weekends, providing a tour for local retirement homes or to a show in the regional centre or the city.

These tours have all been cancelled and schools will not pay cancellations fees and whilst cancellation fees are an issue, business viability is the ongoing concern.

This particular matter is a state education and state government issue but has fallen between the gaps. This matter the BIC believes should be dealt with in the "no future business viability class" by the National Cabinet.

### Key Proposals for the De-Regulated Sector

The BIC seeks the federal government to set aside significant Australian tourism marketing funds to reignite demand when our borders and flights are reactivated. Governments need to be thinking 6 to 12 months ahead. In terms of the current situation, anything governments can do to improve cash flow should be the primary focus. There has been some relief in Queensland for example in terms of payroll tax deferral.

Other immediate solutions that governments can implement to ease the cashflow burden for this sector include:

- **a national rescue package** that sees capital expenditure and labour costs paid to the operators by government (not operating costs) for cancelled bookings as a result of COVID 19.
- **suspension or waiving of government fees, charges and taxes** and charges (mainly state based) such as payroll tax, registration fees and certificates of insurance fees
- **suspension of road tolls** for buses and coaches for an agreed period
- **suspension of the Road User Charge (RUC)** component of fuel excise for buses and coaches. This would mean a full rebate of fuel excise paid for fuel used for the purposes of bus and coach travel as applies to miners and farmers operating off road. Currently fuel excise is 43.2 cents per litre of which buses and coaches and Industry can claim approximately 27.3 cents per litre as a rebate and the difference is the RUC which is currently frozen at 25.8 cents per litre.

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- **Industry is seeking government to continue with the proposed suspension of the RUC during any period disrupted services due to Covid-19 and for an agreed period of time (no less than 6 months), after return to normal services.**
- **use of the Federal Government wage subsidies** which will allow coach drivers who are stood down because of no work to remain on the books of their employer to ensure the availability of drivers once the economy kick starts again.

## Bus and Coach Manufacturing Sector

The manufacturing, supplies and services sector of the bus and coach industry is an important contributor to the Australian economy. It is also an important contributor to a heavy vehicle automotive manufacturing labour skill set that goes beyond just building buses and coaches. It continues to meet the many challenges of a global vehicle market-place that has seen many manufacturing sectors fall by the wayside and remains competitive in the Australian market, including some small export opportunities.

The BIC estimates that in the manufacturing of the completed bus, \$5 billion is contributed to the Australian economy each year and close to \$1.5 billion in supplies and services to keep the bus operational and delivering services.

The BIC estimates that the manufacturing sector employs more than 10,000 people in Australia including a strong network of Australian and global component manufacturers (eg. public transport seats) and suppliers that support the build of a bus (eg. air conditioning units) most of whom have setup businesses in Australia.

**The BIC recommends that state and territory governments vehicle replacement procurement for bus and coaches be maintained if not accelerated to support the sector and retention of jobs.**



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# INDUSTRIAL RELATIONS AND WORKPLACE HEALTH & SAFETY

## Industrial Relations 2020

APTIA, the industrial arm of the Bus industry Confederation will focus on a range of issues in 2020 including recognition of public transport bus services as an essential service and the finalization of the 4-yearly review into the modern awards including the Passenger Vehicle Transportation Award 2010.

APTIA will monitor the 2019 decision in the Skene case. This case relates to the payment of leave entitlements to employees who are considered casual employees but have a regular expectation of continued work and therefore entitled to such leave. This could have significant impact on the Industry. The Skene case is now being tested in Rossato's case in which the Federal Government has intervened.

APTIA will monitor the decision in the Mondelez case, which decided that personal leave should be calculated by the day not hours. This has been appealed to the High Court and the Federal Government has intervened in this case.

In both cases the Federal Industrial Relations, Minister, the Hon Christian Porter has indicated the Government will introduce legislation to overturn any decisions that impact unfairly upon employers.

The Minister for Industrial Relations has also identified a number of issues that will form the basis of any legislative changes this include matters specific to the passenger transport industry:

- Casual employment
- Improving protections of employees, wages and entitlements
- Unfair dismissals, and
- Enterprise bargaining.
- APTIA will provide submissions and input on these matters.

## Bus driver violence and abuse

The BIC supports all states and territories introducing strong penalties for attacks on bus drivers and putting bus passengers at risk.

The BIC is concerned about the increased levels of abuse and violence directed at bus drivers (and passengers) and calls for a strong regime of penalties to be introduced in parallel with an ongoing information campaign to inform the public of the consequences and seriousness of committing crimes on people providing a public service to the community.

The BIC is undertaking a joint initiative with the Australian Railways Association, Rail Tram and Bus Union and TrackSafe. The initiatives for governments to consider to protect public transport employees are outlined below. Patronage on public transport continues to grow and so too do incidents of anti-social behaviour and violence towards transport staff. Like emergency personnel, public transport staff provide a vital service for our communities, assisting millions of Australians to travel around our cities and regions daily. These individuals deserve to go to work and do their job without threat or harm so they can return home safely.

The Western Australian Government first led the way, when in 2009 it introduced mandatory jail for assaults against public officers (police, ambulance officers, transit guards, court security officers, prison officers and youth custodial officers). The legislation was further strengthened in 2014, introducing a minimum jail term of 12 months for grievous bodily harm to public officers; nine months for bodily harm (in

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circumstances of aggravation); and six months for assault causing bodily harm. Calling the legislative changes “an effective deterrent against violence”, in 2016, the Western Australian Government reported that a 26 per cent reduction in assaults against public officers and a 35 per cent reduction in incidents obstructing public officers had been achieved since amending the legislation in 2009. In March 2016, the South Australian Government demonstrated its value for and commitment to public transport staff by increasing penalties for assault on transport staff to equal that of assaulting emergency services personnel.

Rather than wait for another victim to act, we implore all jurisdictions/Ministers to adopt a similar approach in Queensland by amending legislation to include increased penalties for those who assault public transport staff and then ensuring these heightened penalties are applied. Anti-social and violent behaviour towards public transport staff is unacceptable. Elevating penalties to align with assaults on emergency services staff will reinforce to the travelling public that abusing and assaulting transport staff whilst they are simply doing their job will not be tolerated.

Safety of all persons is the number one priority for public transport operators, including staff. To address anti-social behaviour and assaults on staff, public transport operators should educate customer-facing employees in protective personal violence elimination security approaches such as (but not limited to):

- maintaining situational awareness
- effective communication techniques
- de-escalation methods
- best practice security support to staff through empirically validated advances in security technologies (body-worn cameras, CCTV, security screens and duress alarms).

## Bus Industry Confederation

# CITIES, TAXES, CHARGES AND INFRASTRUCTURE

## Bus Rapid Transit

A recent report produced in South Australia titled *Developing Bus Rapid Transit -The Value of BRT in Urban Space* highlights that the Adelaide O-Bahn bus system is far more efficient than Adelaide rail. The O-Bahn started operating over 30 years ago and was the first BRT in the southern hemisphere. A light-rail transit line was planned along the River Torrens corridor to service the growing north-eastern suburbs but on paper the O-Bahn stacked up. It was cheaper than light rail to build and operate; and importantly it offered flexibility, allowing buses to enter and exit from the road system.

The BIC has produced two major reports on why BRT is a very good option which includes an assessment criterion to look at prospective projects and compare BRT, light and heavy rail options.

In 2020 BIC has entered a strategic advocacy partnership with Roads Australia was host a series of workshops in Sydney, Melbourne and Brisbane in association with Infrastructure Australia. Due to the COVID 19 crises the three workshops with be replaced by an “on-line” workshop in June 2020. This will involve Industry, government road authorities and major road infrastructure building companies. The aim of the “on line” workshop is to develop an initial policy focused report for TIC and TISOC consideration to implement in Australia’s cities and growth centres and why and how investment in bus rapid transit is part of the solution to Australia’s passenger transport challenges. Further face to face workshop may be held in the future.

The “on-line” workshop report will prepare advice for state and federal ministers on the future of successful bus services for all jurisdictions in Australia. The development of a set of principles will guide the optimum pathway and is planned to be tabled and considered at the 2020/21 series of Transport and Infrastructure Council (TIC) meetings.

## BIC and Roads Australia Joint Bus Passenger Transport Infrastructure Initiative 2020

Roads Australia and the BIC were to lead workshops with key industry and government representatives to be scheduled in Melbourne - 28 April, Sydney - 30 April and Brisbane - 5 May 2020. Due to COVID 19 an on-line workshop will instead be held in June to progress this initiative.

The objectives of the workshop was to prepare advice for state and federal ministers on the future of bus services in Australia and the same will apply to the “on – line” workshop.

Options to be considered at the workshops will include the development of a set of principles to guide the optimum pathway for the future of successful bus services and for all jurisdictions to agree on for tabling at 2020 TIC meetings. The principles and priorities to be addressed at the workshops are:

- fleet and infrastructure innovation
- costs and contracting models
- regulation
- adopting best practice
- service design and models – future mobility design

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- convenience and accessibility
- accessibility and equity.

### *Fleet and infrastructure innovation*

- > Bus priority infrastructure and technology such as bus lanes, priority technology at lights, bus queue jump lanes at intersections, access and parking.
- > Opportunities and challenges in transitioning the fleets to electric and/or autonomous including fuelling infrastructure and cost to government.
- > Consideration of both EVs and hydrogen fuel cells.
- > Fleet standards and ageing fleets - transition to a lower maximum age (for example, 25 years and 364 days to 18 years in NSW).
- > Bus design and local manufacturing, safety, efficiency.

### *Costs and contracting models*

- > Cost to government – operational expenses and capital. Understanding what that might be and how they can be incorporated or integrated into contractual arrangements.
- > Utilising the use of school buses outside of school travel times.
- > Ticket pricing.
- > Integrated planning with service and infrastructure with a joint approach across government to establish new procurement principles at a national level.
- > On road charging for electric buses as an alternative to depot charging.
- > Business cost drivers including ageing fleet maintenance and staff wages.
- > Performance based standards to be considered in the renewal of contracts.
- > Key performance indicators to be considered for government as well as industry.
- > The level of autonomy that industry has and restrictions on contracts by government - whether this needs to be re-evaluated for better market response.
- > How we measure economic benefit for contracted services and the opportunity to align thinking around customer journey outcomes and economic benefit with NSW and Vic's organisational restructure.
- > Different business cases for road and public transport when looking at service improvements. A one business case approach recommendation to consider the impacts on both vehicles and buses.

### *Regulation*

- > Commercial viability – the NSW example of a 24-seat bus mobility as a service option where the driver, vehicle and passengers are not covered in NSW P2P legislation due to being more than 12 seats.
- > National Heavy Vehicle Law - safety record.

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- > Regulatory issues currently only based on contract.
- > Rigid compliance with disability standards.
- > Areas and zones - the level of control by government in planning and limited impact of local councils.

## *Adopting best practice*

- > Common benchmarking of both industry and government.
- > Assessing the key drivers of community satisfaction and customer satisfaction.
- > Ensuring good research is conducted to determine data requirements and safety outcomes and how to transfer this knowledge to drive best practice.
- > NSW inquiry into electric buses to examine the benefits and barriers to city and regional public transport fleets.
- > Learning pilots and trials (for example, TfNSW and its current On Demand service trial) and transparency around the different models and their outcomes.
- > Attracting and retaining staff in the industry and the challenges around this including population growth, congestion and increasing bus services.

## *Service design and models - future mobility design*

- > Changing markets and what technology might be introduced.
- > On demand vs fixed scheduled services vs turn up and go and ensuring the bus mode has appropriate frequency and coverage.
- > Importance of mass transit services and connectivity to rail.
- > New business partnerships such as technology and bus companies.
- > Councils - local area traffic plans impact bus services and therefore impact the reliability of the bus service.
- > What drives the customer experience - Comfort - Improvement of regional and rural public transport connectivity.
- > Improvement of local bus services in outer suburbs.
- > Ensure services can cater for the disabled, mobility impaired, families and students.

## *Convenience and accessibility*

- > Ticket cost.
- > One ticket solution for each state that is consistent with metropolitan areas.
- > Enhancement of service and technology on buses including WiFi, USB charging, bus stops with real time data and bike racks.



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### Accessibility and Equity

- > Improvement of regional and rural public transport connectivity.
- > Improvement of local bus services in outer suburbs.
- > Ensure services can cater for the disabled, mobility impaired, families and students.

## Value capture and innovative funding

The BIC supports the adoption of innovative funding and finance options including value capture as outlined in BIC's Policy Paper 3: *Public Transport: funding growth in urban route services*.

### Road User Charging

The BIC supports the introduction of road pricing for all road users based on use, like any other utility charge (i.e. electricity, water) as outlined in BIC's Policy Paper 1: *Pricing opportunities for Australia: Paying our way in land transport*.

Road pricing could be introduced in stages as:

- heavy vehicle pricing
- general congestion charging
- time of day tolling.

The BIC supports the introduction of an independent heavy vehicle pricing regulator. The independent pricing regulator should differentiate between trucks and buses, taking into account external benefits such as reduced congestion, emissions and road wear.

### Heavy Vehicle Charges and Road Reform trials

The NTC was tasked as part of its 2015-18 work program to investigate future pricing arrangements for heavy vehicles. This was to include a number of road pricing trials being managed through TISOC.

The Federal Minister at the time for Urban Infrastructure, Paul Fletcher, was taking a lead on this project and announced in late 2017 a **National Heavy Vehicle Charging Pilot**. This pilot under the new Minister Alan Tudge saw selected participants involved in a pilot program to test the replacement of registration fees and the fuel-based Road User Charge with a national direct user charge. The pilot will run initially through to 2020.

The Pilot has also established small targeted and temporary programs to look at location specific heavy vehicle charging trial proposals.

The BIC has sought the introduction of comprehensive road pricing for all road users and this national Pilot is a step in that direction.

The **Business Case Program for Location-Specific Heavy Vehicle Charging Trials** were sought in 2019 seeking ideas for potential trials to investigate the feasibility and willingness of industry to pay an additional charge (above PAYGO) for an additional level of access or improvement on identified routes. These types of trials are likely to be more suited to the trucking industry (e.g. road improvements to run higher productivity vehicles) but the federal Department was happy to explore how it could be applicable to buses and coaches.

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The **National Heavy Vehicle Charging Pilot** involved designing and testing options to replace the fuel charge and registration fees. The first on-road stages of these trials are 'cashless' i.e. will involve participants receiving a mock invoice outlining what they paid under the current PAYGO system compared with an alternative mass-distance or mass-distance-location charge.

The Department designed how the on-road stage of the Pilot could work in practice e.g. how to measure mass (dynamically or through weight categories), requirements for telematics or paper based system, how to record location and distance, how to reduce the administrative burden for operators. The Department met with the BIC to work through these approaches and identify some candidates for a small-scale rollout of the on-road stage. There is opportunity for bus operators to be involved.

Buslines and Bayswater Buslines have been participating in the pilot.

The Department of Infrastructure, Transport, Regional Development and Cities is now running a National Heavy Vehicle Charging Pilot. The National Pilot is a partnership between government and industry testing potential direct user charging options for heavy vehicles. The Department Team were at the 2019 BIC Conference in Canberra to seek participation in the trial.

As mentioned, a Small Scale On-Road trial of the National Pilot has been running over the past 5 months with 11 participants (including 2 BIC members) and over 180 vehicles.

Similar to the Small Scale trial, the Large Scale On-Road trial is free to participate in and will include both telematics and manual reporting options to collect data. It will start in 2020 with 100 businesses and over 1000 vehicles across the country.

The Large Scale On-Road Trial is supported by the BIC as a means to an end to introduce a comprehensive road user charging system established for all road users and a great way for the bus and coach industry to have its say about potential alternative heavy vehicle charges, better understand current charges and talk directly to the Department about the National Pilot.

The Department is currently recruiting for the trial and looking for participants from Industry across all states and territories, particularly those with a small or medium sized fleet. This does not exclude large fleets. The BIC and State Associations are actively supporting the recruitment of bus companies to participate.

### How the Large Scale On-Road Trial works

The Department states...

*"There is no cost to participating in the Trial and the impost on your time is minimal.*

*Each month during the trial participants' road use data will be collected using telematics or a manual reporting option \* and a mock invoice will be produced. (\*During the life of the trial, the Department will pay for installation of telematics or hubodometers for eligible businesses.)*

*The mock invoice will compare what you currently pay, registration and fuel-based charges, with a potential alternative charge based on mass, distance and location.*

*The mock invoice will also include data analysis; insights on fuel consumption; operational costs and broader industry trends. All data collected in the trials is protected under confidentiality agreements and cannot be shared outside of the project."*

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It is important for all sectors of Industry, the BIC believes to have a say in any future changes to Heavy Vehicle charging. This is an important step to ensure that bus is clearly differentiated from trucks and freight when it comes to road charges.

BIC seeks the support of all jurisdictions to be aware of the need to clearly differential between buses, coaches and trucks that takes into account the different operating task of passengers and freight and the positive and external benefits of travelling by bus and coach as opposed to single or low passenger car trip averages.

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# NATIONAL PT CONTRACTS AND BENCHMARKING

## Bus service procurement and contracts – A National Framework

In April 2016, the BIC published Policy Paper 7: *National Guidelines for Procuring Bus Services and Bus Service Contracts*, calling for the development of a national approach or framework within which the procurement of bus services is undertaken. It also lists how bus contractual terms and conditions, KPI's (such as patronage, service levels) should be determined.

The 'national framework' would have an agreed set of parameters and guidelines whilst still allow for the idiosyncrasies that occur in each state/territory. It would also cover the types of services and purchase of vehicles.

The 'national framework' would apply to:

- existing and renewal of contracts
- tenders/contract negotiations
- procurement of vehicles and services.

Adopting a 'national framework' will:

- provide a level of consistency across tenders, contracts and vehicle purchasing arrangements
- give operators and manufacturers a level of certainty
- reduce costs – a micro economic reform that will save money for taxpayers, governments and businesses in every state and territory.

## National Disability Insurance Authority

The BIC is seeking assurances from the NDIA, federal, state and territory governments about the continuation of special school bus services by contracted private operators. States and territories provide these services in different ways, but where private bus operators undertake the task, they have proven over a long period to provide cost effective transport services and provide the highest levels of care and professionalism. These special school services have been developed over many years in close partnership with the communities and schools they service and relationships with the families for whom they provide the services. They are in effect a part of a mature regulated marketplace that provides transport choices to parents.

## National Travel to Learn and School Bus Travel Policy

The Bus Australia Network will continue to investigate the development of a National Travel to Learn and School Bus Travel Policy based on four principles:

1. Quality – Improving the quality, coverage and variety of bus services available for school travel.
2. Safety – Ensuring the safety of children travelling to school while they are on the bus and around the bus.
3. Fairness – Meeting the needs of all school children regardless of location, age and situation.
4. Efficiency – Establishing a system of funding and operation for school bus services which delivers value

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for money to government.

### *Goals of a National Position on Travel to Learn and School Bus Travel Policy*

A National Travel to Learn and School Bus Travel Policy be based on three goals.

1. Achieving national harmonisation regarding regulation, accreditation and vehicle sourcing for school bus services.
2. The establishment of a jurisdictional taskforce to identify principles and guidelines to be adopted in school bus contracting, through BIC's National Contracts Working Group.
3. Promoting and maintaining the high safety standards of school bus travel.



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# REGULATION, REFORM AND INDUSTRY STANDARDS

## Review of National Heavy Vehicle Law (NHVL)

The Review of NHVL should agree the following principles. The BIC has responded fully to the 8 Consultation Papers in 2019.

### *Six key principles in the review of NHVL*

1. **Recognition that one size does not fit all** when it comes to heavy vehicle law – different sectors have different needs. The NHVL should recognise the difference between truck and bus and the task undertaken including technical issues with vehicles and contracted operations – including specific recognition of a national minimum safety standard for accreditation for buses and coaches.
2. **The NHVL should have a stronger performance and risk-based approach**, that provides operational flexibility, is less prescriptive and offers performance based/alternative compliance approaches for operators to meet the law. This should include incentives for the operators and recognise good compliance performance and should include greater acceptance of technology as a compliance tool. The NHVL should not prescribe the technology only the compliance performance outcome and establish an appropriate alternative compliance enforcement regime that allows on road enforcement resources to be better targeted and for good operators to get on with the job.
3. **The NHVL maintenance group is unnecessary.** The law should be allowed to work and not be under constant scrutiny and review (generally by jurisdictions) where there are issues raised or problems identified, due to things like idiosyncratic industry operational needs or state differences. This would be better dealt with through NHVR and specific regulation to address these types of issues. The NHVL maintenance group is a contributing factor to promulgating state by state HV laws and undermining national uniformity.
4. **The impacts of the NHVL on the future passenger task.** The NHVL should be considered more thoroughly when it comes to buses, in the context of the future passenger task, the future impacts on the task such as population growth and congestion, automation and the efficient functioning, for example, of cities and the transport network. The NHVL should not be considered in isolation of these broader societal outcomes.
5. **The NHVL should be more focused on the use of technology to manage access and safety.**
6. **A Performance Based Standards (PBS) bus system is required.** The PBS is too complex and limits productivity in many instances and simply adds costs because it is based on ‘old school paradigms’ about infrastructure, safety, environment and other factors that are focused on the negative and not providing access. The PBS should focus on productivity outcomes and how and what access can be achieved.

### *Controlled Access Bus network*

The BIC is seeking the support of state and territory governments to prioritise through the NHVR work program and local government, the identification and mapping of high productivity, Controlled Access Bus networks in their state/territory.

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### *Minimum bus safety accreditation – NHVR Accreditation*

The BIC supports a minimum bus safety accreditation regime that is mutually recognised as “**The Standard**” for all bus operations across Australia including:

- government contracted services
- school and Community services
- charter and touring services.

Each state and territory currently require a level of accreditation to operate bus passenger services but with no consistency around what operators are doing to meet their legal obligations under NHVL.

The BIC has held discussions with the NHVR to coordinate with jurisdictions and Industry, an agreed accreditation regime that sets a minimum safety standard for passenger bus operations and services in Australia.

State and territory governments would retain administrative management of the state and territory based accreditation scheme but mutually recognise the minimum standard as the benchmark for all buses to meet to be entitled to pass through their jurisdiction.

**The Standard** would be based on 3 core modules.

1. The Driver – license, driver authority, health etc.
2. The Vehicle – road worthiness and maintenance records, etc.
3. The Operator (management) – driving hour records and other legal requirements, etc.

**The Standard** will:

- set a core set of safety standards adopted across all types of operations
- ensure all bus services operate safely and be mutually recognised across borders
- set a minimum audit regime consistent across all jurisdictions
- enable the flexibility for states to build additional requirements above **The Standard** within their own accreditation regimes.

The BIC does not support NHVR Codes of Practice for the bus Industry.

### *Performance Based Standards (PBS) specifically for buses*

The PBS is a scheme operated under the jurisdiction of the National Heavy Vehicle Regulator (NHVR). The scheme allows vehicles to operate outside of the Australian Design Rules (ADR) standards as long as the vehicle complies with 16 minimum vehicle performance standards (to ensure they are stable on the road and can turn and stop safely) and 4 infrastructure protection standards.

The PBS scheme was originally designed primarily for trucks and the associated productivity benefits. Buses are eligible but take-up has been minimal as the scheme requires 100% pass mark for each of the 20 PBS criteria. Access to the road network is then classified (e.g. general access, restricted access).

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Adopting a PBS scheme specifically for buses would:

- allow for an effective evaluation of environmental, social and infrastructure benefits of innovative bus vehicles above and beyond the current PBS criteria which is solely focussed on safety and infrastructure
- encourage higher productivity and safety through innovative and optimised vehicle design – for example a tri-articulated 25m bus or 14.5m steerable two axle bus.

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# ACCESSIBILITY AND SOCIAL INCLUSION

## Regional connectivity, accessibility and the decentralisation debate

The BIC supports a strong focus of federal, state and local governments on regional connectivity and accessibility between village, town, regional centre and city. Regional transport connectivity provides economic benefits and provides access to services, education, employment and recreation for those who don't own a car, have access to a car or don't/can't drive.

The BIC's Policy Paper 10: *The value of getting there: mobility for stronger Australian regions* and special edition policy paper: *Australian Government's role in the development of cities* have a strong focus on regional transport and decentralised transport (no single entity controls everything).

The papers identify that transport connectivity and accessibility through transport infrastructure investment and improved passenger services are a major factor and attracter in achieving decentralisation outcomes.

The BIC supports regional passenger rail and coach transport services that support economic growth and promotes regional tourism and social inclusion.

Federal and state governments should support regular passenger transport services for regional communities, including coach services and facilities where no rail service exists. Regional coach services should connect passengers to their destination or closest rail service link.

The federal government should fund Regional Accessibility Committees in regional areas to coordinate travel needs with available transport assets as has occurred in Warrnambool and trialled in Port Pirie.

## Accessible Transport Standards

The BIC participates on the National Public Transport Advisory Committee, (NAPTAC) and more recently in 2019 -2020 the National Accessibility Transport Taskforce (NATT). The NATT Terms of Reference are below.

Key areas for consideration by state and local governments in regard the Standards and the bus and coach industry are outlined below.

- > Accessible Bus Stops and whole of Journey accessibility.
- > Accessible Transport Standards compliance reporting.
- > Labelling of mobility devices to identify complying mobility devices eligible to travel on public transport.
- > Definition of charter services and whether the standards apply to charter services – Industry position is NO.
- > The complaints process and Australian Human Rights Commission and cross over with other discrimination authorities.
- > Safe carriage of people with a disability and alignment of accessible transport standards with the requirements of Australian Design Rules.
- > Occupational Health and Safety impacts of Accessible Transport Standard requirements.
- > Modernisation of the Standards.

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### *National Accessibility Transport Taskforce Terms of Reference -Background*

The Department of Transport and Main Roads (Queensland) (DTMR) and the Department of Infrastructure, Transport, Cities and Regional Development are establishing a taskforce to modernise the Disability Standards for Accessible Public Transport 2002 (DSAPT).

#### Purpose

The National Accessible Transport Taskforce (the Taskforce) will lead the modernisation of the DSAPT, recognising that state, territory and local governments have expertise and close relationships with industry and people with disability. A functional outcome is sought for public transport providers and operators that improves dignity, accessibility and inclusion for people with disability.

The Taskforce will deliver a modernised DSAPT drawn from the current standards and requirements under the National Construction Code (NCC). The Taskforce will be led by a Steering Committee which acknowledges that the Disability Discrimination Act 1992 and its accompanying disability standards as maintained by the Commonwealth, are the primary legal force to the elimination of disability discrimination. The Steering Committee will provide oversight and direction to the Taskforce and ensure that a national perspective is provided to the work of the Taskforce.

#### Guiding principles

This reform approach is built on the following guiding principles endorsed by the Transport and Infrastructure Council.

1. People with disability have a right to access public transport.

The Disability Standards for Accessible Public Transport pursue the removal of discrimination against people with disability first and foremost. The reform process pursued must place people with disability at the centre of their considerations.

2. Accessibility is a service, not an exercise in compliance.

An accessible public transport network anticipates and responds to the varying needs of its customers with disability. This requires thinking beyond compliance with minimum standards and toward a focus on accessibility as a service. The reform process should be open to engaging with opportunities to develop best practise, rather than minimum prescriptive standards.

3. Solutions should meet the service needs of all stakeholders and be developed through co-design.

The new approach should learn from the past modernisation process which primarily focussed on the current individual standards and how they can be amended. This limited the range of solutions to those that fit within the existing framework. The new approach should be open to considering performance-based standards and/or functional outcomes; jurisdictional and modal specific standards; prescriptive standards; or other innovative solutions.

4. Reform should strive for certainty without sacrificing best functional outcome.

Certainty, both legal and in relation to service provision is important for all stakeholders. However, transport operators and providers who take only a minimum standard interpretation of the Transport Standards in fact face greater risk of failing to meet the objectives of accessible public transport. This is because minimum standards do not always achieve the best functional outcomes for people with disability and can result in an unintended discriminatory outcome.

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### *Guidelines for equivalent access for travel on buses and coaches*

The development of Equivalent Access Guidelines may be a useful tool but difficult to develop a one size fits all set of bus driver/operator guidelines to meet the many varied access requests that are made.

Equivalent Access Guidelines would need to be developed in consultation with organisations representing people with disabilities.

There are some core issues for consideration for inclusion from the BIC perspective.

- 1. Some mobility devices do not meet the access requirement of the DSAPT** for a bus or coach – we need to be clear on what mobility device can travel and have a right of refusal to carry.
- 2. Equal access should allow for a separate, segregated or parallel service** to be provided which is currently not allowed under the Act. The focus of the Act should be performance based and not prescriptive and be about delivering the mobility outcome and not technical adherence to the accessible transport standards.
- 3. Bus stops and accessible infrastructure standards should be clearly identified** as not the responsibility of a bus operator and a reason to refuse travel if whole of journey access cannot be provided, including things like adventure travel type experiences.

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# TECHNOLOGY, ENVIRONMENTAL AND SAFETY

## Euro 6 Emission Standards

The government does not have a clear or agreed date for the introduction of Euro 6 emission standards as an ADR. The likely implementation date for new models is 1 January 2021 and for existing models from 1 January 2022. The BIC is seeking confirmation on these dates.

### *Euro 6 bus and coach issues*

The BIC has concerns about the problems faced by bus chassis manufacturers and bus body manufacturers in relation to the ‘crystal balling’ of the market to determine the number of chassis they should import, and have in stock, when new ADRs are introduced that set an implementation date that simultaneously introduces a new vehicle/model to the marketplace.

Currently the vehicle certification process for buses demands that a vehicle be fully built and ready for service before it can be “ADR plated”.

This requirement and the introduction of new vehicle emission standards sees bus and coach manufacturers having to complete vehicles as stock vehicles with “*standard*”<sup>1</sup> seating configurations installed so that the bus can be ADR plated by the emission change over date.

Due to the large variations in bus operational conditions, such as school services, route bus or charter services, the industry practice for stock buses is that the seats are left out until a customer is found for the stock bus and then the seats are fitted to meet the specific operating requirements of the customer. If seats are fitted before the intended customer is known, there is no certainty that the vehicle can be sold with the “*standard*” seating configuration in place, typically what happens is that the “*standard*” seating is removed and replaced with the customer specified seating.

The BIC has proposed an alternative approach be adopted by the federal government. The BIC has proposed that buses and coaches be allowed to be built and pre-plated “without seats”. Once the seats are fitted, the bus can then be fully and correctly plated in accordance with the final seating arrangements.

Rules would be required to ensure that chassis were not flooding the market to take advantage of these proposed changes, some suggestions of rules are as follows:

- chassis must have arrived prior to September 30 of the relevant year for new models and all new vehicles and have documentary evidence of the arrival date
- completed vehicles must have arrived prior to December 15 of the relevant year with documentary evidence of the arrival date
- all units must be completed by 31st June of the following relevant year
- these standards apply to vehicles with a seating capacity of 30 to 61 seats utilised in school, charter, tourism and city bus services.

The BIC is seeking the support of all jurisdictions for this approach for the bus industry and BIC would then work through the details of such a process with the Federal Department of Infrastructure, Regional Development and Cities.

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<sup>1</sup> The reality is that there is no standard seat configuration until it is known what work the bus will be used for such as will it be a school, charter or route type bus and this is only known once the customer is confirmed.



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# Energy Transition to Electric Vehicles

The possibility of substituting electricity for oil as a fuel source for motor vehicles is of considerable global interest, for reasons such as the opportunity for lower emissions of greenhouse gases and air pollutants (NO<sub>x</sub>, NHMC and PM), improved tank-to-wheel efficiency (about three times higher than ICEs, according to EU 2017), energy security, lower operating costs, and quieter, smoother operation. Opportunities provided by vehicle batteries, and their usage patterns, to link electric vehicles (EVs) to distributed energy systems are a further source of appeal. However, challenges such as high capital costs, range anxiety (partly linked to a shortage of charging locations), battery size, battery life and management of used batteries stand in the way of rapid implementation.

Global and European sales are currently very small, with plug-in hybrid and battery EV sales, for example, representing only 1.2% of all new cars sold in the EU in 2015 (EEA 2017). The share was 22.5% in Norway (not an EU member). On a more positive note, China sold 0.5m electric vehicles in 2016, including buses and commercial vehicles, but is targeting manufacture of 7 million battery cars and hybrid vehicles by 2025 (driven much by air quality concerns). Shenzhen, with its fleet of more than 16,300 buses, is the world's largest and only all-electric bus fleet. Electric bus technologies featured prominently in Shenzhen Bus Group's<sup>2</sup> Bukit Merah bus contract bid in Singapore<sup>3</sup>. Volvo has announced that it will only launch electric and hybrid models starting from 2019. France and the UK have announced plans to ban sales of diesel and petrol cars by 2040, with local air quality again a key driver of this change but GHG emission reduction is also important. The Netherlands and Norway plan earlier phase out dates.

Australia's GHG emissions should make penetration of EVs powered by renewable energy a policy priority. A relatively fast move towards electric vehicles (EVs), in particular, would be of great assistance in terms of lowering emissions outcomes. CSIRO (2017) estimates that electric vehicles are already 50-70% less emissions intensive than ICEs in Australia, arguing they are essential to widespread emissions reductions from light vehicles. They find, however, that electric vehicles are not yet cost competitive. A recent meta-study of take up forecasts by ENA and CSIRO (2017) found that, without significant policy interventions or sharp rises in fuel prices, electric vehicle adoption is likely to remain well below 15% in Australia by 2030. Electric vehicles are, therefore, currently not expected to provide a major contribution in reducing light vehicle emissions intensity before 2030. However, there may be scope to focus on a transition for buses to electric vehicles as a priority that could be fast tracked taking into account the issues outlined below.

## Electric Buses

The Bus Industry Confederation sees future bus technology to be fully electric vehicles based on a transition that takes into account the Australian circumstance when it comes to the existing fleet and a range of other factors that are outlined below.

A small number (less than a hand full) of large buses operate on Australian roads.

There are a number of electric bus trials underway around Australia, with no real commitment as yet to move to a fully electric fleet. The ACT government has made some announcements to this effect.

In July 2019, the Victorian government announced that it will procure 50 hybrid electric buses to be delivered by 2022.

This is the result of hybrid bus trials run in Victoria since 2011 that found that hybrid buses used 30% less fuel than a standard diesel bus and improved emission performance and reduced noise significantly during idling and departure from stops.

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<sup>2</sup> A subsidiary of Hong Kong-based Transport International.

<sup>3</sup> This tender was subsequently awarded to incumbent SBS Transit on 23 February 2018

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Fuel savings however were very closely linked to the 'duty cycle' of the hybrid vehicle.

The decision to move to hybrid technology by the Victorian government in some way reflects the realities of the Australian bus market place and the challenges of introducing a fully electric bus fleet in the context of a low emission Euro 6 diesel bus that delivers significant reliability and whole of life benefits and surprisingly to some, emission benefits.

### *Key Issues for consideration that impact on the Australian take up of Electric Buses*

1. The existing Australian bus fleet has an average age of 12 years or less in most states and territories with an expected full bus life of 20 to 25 years.
2. Modern diesel is extremely competitive in a whole of life and emissions sense. Compared to the cost of new electric buses.
3. Battery range, life and cost.
4. Re-charging infrastructure and availability whether depot based or on-road and the possible impact on base load power for re-charging of larger numbers of vehicles at one time.
5. Lack of incentives to encourage procurement of electric vehicles and invest in electric charging infrastructure.
6. Road infrastructure impacts of increased bus gross vehicle mass as a result of batteries.

The BIC recommends a transitional approach to the adoption of fully electric bus technology for Australia.

This transition should take into account:

- the current historical investment in the diesel bus fleet and whole of life asset values
- existing government fleet replacement programs based on the above
- acceptance of a mix of fuel and vehicle types in the short to medium term that includes diesel, gas, hybrid and electric vehicle in the interests of transport and energy security
- federal government incentives, (investment allowance, accelerated depreciation, up front capital differential payment), to support transition to electric buses. This could be provided on the basis of agreed delivery of the increased number and frequency of bus public transport services, similar to "asset recycling" principles". The BIC is undertaking some work currently on this "incentives economic model" for consideration by the federal government
- federal government support for local manufacturing capability to manufacture hybrid and electric vehicles.

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# National Bus and Coach Vehicle Safety Specification Project – NHVR Heavy Vehicle Safety Initiative Funding 2020 – 2021

The BIC has made application to the NHVR Heavy Vehicle Safety initiative to develop a National Bus and Coach Safety Vehicle Specification Advisory (Advisory) as part of Tranche 5 of this funding program to be completed by end June 2021.

The BIC seeks all jurisdictions support for this project and funding request.

The Project in summary will provide a standardised national bus and coach vehicle safety specification advisory (Advisory) for bus and coach operators, bus and coach vehicle and service procurers (government and private) and passengers.

The Advisory will deliver heavy vehicle (bus and coach) safety outcomes through the development of materials to support increased safety awareness and compliance through a heavy vehicle bus and coach safety education and awareness publication.

The Advisory aims to:

- provide guidance to bus and coach buyers on the required safety standards under Australian Design Rules, unique state-based vehicle standards (where applicable) and Industry best practice in specifying a bus or coach for passenger services
- establish agreed and consistent minimum bus and coach (vehicle) safety standards in consultation with all jurisdictions and relevant parties
- capture the operational features and characteristics of the Australian bus and coach industry to provide safe, efficient and comfortable buses and coaches through the provision of this information in one document.

The specifications in the Advisory will include the safety requirements and outcomes that are called for in government and private sector procurement tenders/contracts.

A key issue to be addressed by this Advisory will be consistency across jurisdictions.

In some instances bus safety requirements employed by some sections of the bus industry or by procurers of bus and coach services are in excess of national regulation, whilst at the same time some state based regulations are commonly 'cherry picked to achieve a perceived optimum safety outcome even in states where such regulation is not applicable. This can result in vehicles being over specified for their purpose and cost of vehicles increased.

Currently many (but not all) bus supply tenders/contracts require compliance to existing BIC safety related advisories, such as the BIC Bus Door Safety Advisory and the BIC Bus Fire Mitigation Advisory.

In summary the proposed *National Bus and Coach Vehicle Safety Specification Advisory* aims to achieve the following outcomes.

1. **Allow government to work with industry to agree a set of bus and coach vehicle standards** and core safety outcomes that are aligned with the operational features and characteristics of the Australian bus and coach Industry.
2. Encourage best safety and productivity practices for all bus and coach vehicle types.
3. **Provide industry and transport regulators and authorities with a consolidated reference document** (Advisory) that contains information on the systems and standards that are to be the base of all bus and coach safety specifications.

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4. **Encourage consistency of standards across the Industry** to maximise the safety performance and efficiency of the bus and coach fleet.
5. **Assist operators and procurers of buses and coaches generally** with the information and guidance to make informed decisions regarding safety when purchasing new buses and coaches.

A full copy of the funding application is available upon request.

## Vehicle Width – 2.55 metre vehicles

The BIC supports the ADR system which is based on world best vehicle standards and safety requirements. The current ADR for vehicle width is 2.5 metres.

The BIC also supports PBS for heavy vehicles which allows manufacturers to apply for PBS approved ADR exceptions. The BIC is concerned that PBS buses are being approved by the PBS panel that do not provide any productivity, safety or environmental benefit that defeats the original purpose of the PBS scheme.

High productivity vehicles PBS approved to Level 1 road network access were recently provided general access if they did not operate near legal mass limits. PBS Level 1 over width buses were explicitly excluded from the national law change by Ministers. The BIC is trying to ascertain the actual status of this exclusion and if over width buses under national law cannot be provided general access to the road network.

This also relates to the recent review of PBS by the NTC that recommends that state and territory governments identify networks for each access level.

The BIC can make available a paper that outlines the concerns about the PBS approval process and PBS approved 2.55m buses and access to a suitable road network.

## Review of Australian Design Rule 58 (Omnibus for Hire and Reward)

The BIC is participating in the review of ADR 58. The BIC in this context supports making the ADR clearer and less ambiguous. The BIC supports harmonising with EU vehicle standards when it is practical but not at the expense of lowering existing vehicle safety standards or for the sake of harmonisation alone.

## Review of Road Vehicle Standards (RVSA) Act

On 28<sup>th</sup> November 2018, the Road Vehicle Standards Bills passed through Parliament and the new legislation will introduce a number of regulatory changes to the provision of a road vehicle in Australia. Together with this legislation, a new set of Road Vehicle Standards Rules (which will be the regulations under the Road Vehicles Standards Act) are also being introduced.

The Road Vehicle Standards Act (RVSA) was scheduled to commence on the 10<sup>th</sup> December 2019, this has now been delayed to 1<sup>st</sup> July 2021 or at an earlier date, but the Department of Infrastructure, Transport, Cities and Regional Development (DITCRD) has indicated that the new system may be introduced as early as 1<sup>st</sup> July 2020.

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The Act enables most MVSA approval holders to be able to continue importing and providing vehicles under their existing approvals until late 2020. These regulatory changes, and the associated administrative processes include:

- introduction of the Register of Approved Vehicles, an online, publicly accessible database of vehicles approved for supply in Australia
- changes to the supply of mainstream (full volume) new vehicles
- clarifying suppliers' recall responsibilities for all vehicles
- improving consumer access to a wider range of specialist and enthusiast vehicles
- simplifying the process for providing vehicles through the Registered Automotive Workshop Scheme (RAWS) while improving the quality assurance of those vehicles
- simplifying the pathways for importing vehicles granted concessions against national vehicle standards
- strengthening the government's compliance and enforcement powers; and
- enhancing and replacing IT systems used to administer the RVSA
- ability for Vehicle Safety Standards branch (VSS) to recover the costs associated with the administration of the RVSA.

This will mean that suppliers and manufacturers of certified components, chassis, bus bodies and completed buses will be affected by these changes and members are encouraged to review the information provided by VSS at the following web pages:

- Road Vehicle Standards legislation implementation  
<https://infrastructure.gov.au/vehicles/rvs/index.aspx>
- RVSA Implementation Consultation Framework  
[https://infrastructure.gov.au/vehicles/rvs/rvsa\\_implementation\\_consultation\\_framework.aspx](https://infrastructure.gov.au/vehicles/rvs/rvsa_implementation_consultation_framework.aspx)

VSS initiated five consultation groups to facilitate the implementation of the new legislative framework and the BIC is represented on the following:

- Type Approvals Group
- RVSA Tools Group
- Concessional RAV Entry Group
- Road Vehicle Recalls Group
- Vehicle Certification Group.

The BIC has attended a number of meetings and has submitted a detailed response to VSS in regard to:

- RVSA legislation for 'Standard' and 'Non-Standard' vehicles under the one Type Approval
- RAV 'Entry Pathway Sub-Category' processes
- Renewal of approvals
- Opt-In approvals
- RAV Month and Year of Build Date

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- Test Facility Registration
- Cost Recovery Impact Statement
- Sub Assembly Data Sheets (SADS) associated with SARN approvals.

The consolidation process has now been moved to more direct consultation and the BIC is part of the group that includes truck and trailer representatives. DITRDC have provided a response to all the BIC issues and these responses are available on request.

## The BIC Bus Safety Initiative 2019 – 2021

The 2019 BIC Conference included a session focused on the development of a national approach to bus safety issues that impact on road safety. This session concluded with the call for Federal Assistant Minister for Road Safety Scott Buchholz to take a lead on this initiative through TIC and TISOC meetings and processes.

The national approach would agree a bus safety strategy that would remove duplication, pick up good ideas already in place and agree a national package that delivers national benefits to address the myriad of issues that bus operators deal with on a daily basis that impact on road safety, driver safety, passenger, personal and community safety.

Following are the ideas presented at the BIC conference for TIC and TISOC to consider as a starting point for discussion with Industry.

### *Ten key national recommendations for government to ensure bus safety*

1. **A national minimum bus safety accreditation** framework that is mutually recognised by all jurisdictions.
2. **A national bus safety data set that is collected by police and accident investigators** that will better reflect what is happening on the road for accidents, injuries and fatalities involving buses, pedestrians and other vehicles.
3. **A national and uniform school bus safety signage** and lighting standard and road user education program.
4. **A national bus specification safety standard** for government contracted services.
5. **A national approach to seat belts on buses.**
6. **A national approach to bus driver penalties** and sanctions for driver abuse and violence.
7. **A national standard for driver protection on buses** and driver training in dealing with violence and abuse.
8. **A national bus stop standard** for passenger security and protection.
9. **Recognition of public transport as an essential service** so no passengers are left behind as a result of industrial action.
10. **A national bus safety awareness campaign.**

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### *School Bus Flashing Lights and Signage*

The NSW Government undertook a review of the requirement for school bus flashing lights and signage on the back of buses in 2017-18. This signage warns other road users that a school bus is stopping or stopped and that children will be entering or egressing the bus.

The requirement exists in other states and territories but there is no common approach to the specification of the signage or types of lighting arrangements.

The BIC has developed a national specification for school bus flashing lights and signage for consideration of the NHVR and jurisdictions.



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# LONG DISTANCE, TOUR AND CHARTER

## National Long Distance, Charter, Express and Tourism Policy

In 2019, the BIC published a special edition policy paper: Coach solutions for land transport tourism

This policy paper statement on the Long Distance, Charter, Tour and Express sector of the bus and coach industry focussed around the development of a 2028 National and Regional Land Transport Tourism Plan. The publication is available on the BIC website at [www.ozebus.com.au](http://www.ozebus.com.au).

The BIC has published a 10 year moving people strategy for driving land transport tourism.

In developing this strategy, the BIC has worked closely with members of the Bus Australia Network and collaborated with coach operators and tourism organisations. A clear and planned strategy is urgently needed to support the diverse range of passenger transport services provided by the coach sector and the benefits that they bring to our communities and the Australian economy.

This 10 year strategy document will reach the desks of more than 450 senior executives and politicians including: -

- > current serving Members and Senators of federal parliament
- > state politicians with a tourism, regional development, or local government portfolio
- > CEO's of state tourism councils and local government associations
- > a huge cross-section of Australian bus and coach operators....and many more.

The publication includes 9 key areas that all levels of government and industry should adopt to increase travel by coach to generate dispersal of tourists from major cities and attractions to regional Australia and grow Australia's tourism economy.

- New marketing strategy for coach travel.
- Better data via market research.
- Coach infrastructure in Australian cities and major regional towns.
- Airport infrastructure and access.
- National Parks access.
- Addressing skills shortages.
- Service and tourism investment incentives.
- Heavy Vehicle Regulation.
- Performance based Disability Standards.