Future COAG Regulatory Reform Consultation
Submission by the Bus Industry Confederation

October 2011
The Bus Industry Confederation (BIC) is the peak national body representing the interests of Australian bus and coach industry operators and suppliers. As the primary voice of the bus and coach industry in Australia the BIC works with all levels of Government, regulatory authorities, the industry and the community to:

- Encourage investment in public transport infrastructure and services.
- Coordinate and make more effective existing Federal, State and Local Government policies and programs that relate to passenger transport.
- Improve public understanding of the contribution made by the bus and coach industry to Australia’s economy, society and environment.
- Ensure that the accessibility and mobility needs of Australians are met, regardless of where they live or their circumstances.
- Ensure that buses and coaches operate safely and effectively.

The Coach Sector – Economic Contribution

The coach sector of the bus industry comprises long distance and regional, rural, tourism, charter and express intercity services which contribute more than $5 billion dollars to the Australian economy encompassing almost 16 million nights of tourism enjoyed by almost half a million international and more than 1.5 million domestic travellers.  

In the coach sector more than 5,000 coaches are in operation nationally, with a rolling stock value of more than $2 billion.

The BIC is seeking a partnership approach with the Federal and State Governments to build on the high value return bus and coach tourism delivers.

This brief and supporting materials supplements the National Tourism Alliances’ submission to the COAG Regulatory Reform Consultation in highlighting the administrative impediment created by the current arrangements surrounding tourist entry to National Parks.

Parks Entry Requirements – An Administrative Barrier

In the absence of a National Parks Entry Scheme, coach operators must apply and meet numerous and duplicative training, accreditation, application and administrative costs/requirements to access various national parks in Australia. (See photo attached of bus window with numerous parks entry stickers)

The coach operator in the attached photo, like many, is registered with seven parks agencies. This company has found it necessary to engage a full time employee to manage all parks access permits and associated ongoing permit and quarterly visit reporting.

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1 Tourism Research Australia, Transport Facts Sheet, 2008
2 Bus Industry Confederation Association Members Survey, 2009
This multiple entry system is a deterrent to operators offering cost competitive tours for both the international and domestic market. This outcome runs counter to the aims of the National Long Term Strategy.

The attached matrix of National Parks Entry Requirements identifies commonalities in requirements between various states on which a National Parks Entry Scheme could be built.

**Recommendation:** BIC recommends all responsible agencies first work to establish consistent requirements and then introduce a mutual recognition system for permit use and we seek the assistance of the Department of Resources, Energy and Tourism to instigate this process.
<table>
<thead>
<tr>
<th>Park/State</th>
<th>Controlling Body for Permit</th>
<th>Introduced/ Reviewed</th>
<th>Who requires a licence?</th>
<th>Training/ Accreditation Requirement</th>
<th>Licence Costs</th>
<th>Access Restrictions</th>
<th>Per Head Use Fee/ Reporting</th>
<th>Application Detail</th>
<th>Certificate of Currency/Public Liability</th>
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<tbody>
<tr>
<td>Uluru - Kata Tjuta Nat Park</td>
<td>Uluru - Kata Tjuta Nat Park - Federal National Parks</td>
<td>2011</td>
<td>Individuals and other commercial entities wishing to conduct commercial activities in the park, including commercial tours.</td>
<td>Requirement from April 2011 - Uluru-Kata Tjuta National Park. Online Tour Guide Accreditation Requirement online [here](<a href="http://environment.gov.au/dst/permitonline/make">http://environment.gov.au/dst/permitonline/make</a> APPLICATION/applyforonline). Includes unauthorised information about Uluru Kata Tjuta National Park. Complete the Online Training for Tour Guides program website registration Application available at: [here](<a href="http://environment.gov.au/dst/permitonline/make">http://environment.gov.au/dst/permitonline/make</a> APPLICATION/applyforonline). Credit can be obtained and renewed can be completed in 2 day intensive training.</td>
<td>For less tours - 1 yr = $100, Lyn &lt; $500, Lyn = $500 or 3 yrs = $300, Lyn &gt; $500, Lyn = $1500</td>
<td>FEEP per day</td>
<td>All promotional materials, list of names of drivers who have completed Uluru Knowledge for Tour Guides program, website registration Application available at: [here](<a href="http://environment.gov.au/dst/permitonline/make">http://environment.gov.au/dst/permitonline/make</a> APPLICATION/applyforonline).</td>
<td>Policy held with approved insurance underwriter (APRA website), Valid PLI certificate of currency for all activities undertaken with minimum value of $20m from Jan 2012.</td>
<td></td>
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<tr>
<td>NT</td>
<td>Dept Natural Resources, Environment, The Arts and Sport</td>
<td>2011</td>
<td>A person shall not in a park or reserve carry on trade or commerce without a permit.</td>
<td>All guides require accreditation.</td>
<td>1 or 4 or less visits $105, 1 yr</td>
<td>No</td>
<td></td>
<td>No</td>
<td>All promotional materials, list of names of drivers who have completed Uluru Knowledge for Tour Guides program, website registration Application available at: [here](<a href="http://environment.gov.au/dst/permitonline/make">http://environment.gov.au/dst/permitonline/make</a> APPLICATION/applyforonline).</td>
</tr>
<tr>
<td>Kakadu</td>
<td>NTAP or advance eco certification required or</td>
<td>2011</td>
<td>Individuals and other commercial entities wishing to conduct commercial activities in the park, including commercial tours.</td>
<td>NTAP or advance eco certification required or All tour guides must complete Kakadu Knowledge for Tour Guides Program School of Tourism and Hospitality Palmerston Campus Charles Darwin University NT 0909 Phone: 08 8946 7845 Fax: 08 8946 7842 International: +61 8 8946 7842 Email: kakadu <a href="mailto:online@fda.edu.au">online@fda.edu.au</a></td>
<td>4 or less tours - 1 yr = $130, Lyn &lt; $500, Lyn = $500 or 3 yrs = $300, Lyn &gt; $500, Lyn = $1500</td>
<td>No</td>
<td></td>
<td>No</td>
<td></td>
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<td>QLD</td>
<td>Qld Dept of Environment and Resource Mgt</td>
<td>2011</td>
<td>Any activity which is conducted for gain is considered a commercial activity and must be conducted only under a permit.</td>
<td>No accreditation program required.</td>
<td>$135.80 p year renewal</td>
<td>No</td>
<td></td>
<td>No</td>
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Requirements similar across states
75% Cost Recovery currently for state govt and agencies - burden and cost for state and operator can be avoided with mutual agreement
Tour yes some idea on detail but less certain
Administrative burden for both state and operator
Complexity deters those from applying and using
Bus Accreditation covers many parts of Accreditation - have BSA or Bus Accreditation recognised as Accreditation standard
In many states - SA, WA, NSW do not require accreditation for 1 yr - how does this maintain objectives of parks?