

Impact Analysis Statement

Summary IAS

Details

Lead department	Department of Transport and Main Roads
Name of the proposal	<p><i>Transport and Other Legislation Amendment Regulation 2026</i> which includes: Amendments to the <i>Transport Operations (Passenger Transport) Regulation 2018</i> to:</p> <ol style="list-style-type: none">omit prescriptive provisions about equipment for off-road passenger services;transition matters from the expiring <i>Transport Operations (Passenger Transport) Standard 2010</i>, and amendments that are:<ul style="list-style-type: none">related, including:<ul style="list-style-type: none">amendments to the <i>Transport Operations (Road Use Management – Vehicle Standards and Safety) Regulation 2021</i> to transition warning sign and light requirements for school buses;amendments to the <i>State Penalties Enforcement Regulation 2014</i> to allow for infringement notices for certain offences and consequential amendments; andconsequential, such as amending references to the expiring legislation; updates to the immediate suspension process; and ensuring transitioned provisions continue to be grounds for refusal, amendment, suspension, cancellation or immediate suspension of operator accreditation or driver authorisation;specify certain requirements for the form, consultation and review of safety management plans and consequential amendments to clarify that non-compliance with safety duties or safety management plan requirements is grounds for administrative action to refuse, amend, suspend, cancel or immediately suspend an operator accreditation or driver authorisation; andspecify certain requirements for audit notices and audit reports.
Submission type	Minor and technical for off-road passenger vehicle amendments, consequential amendments and clarification of immediate suspensions process – no RIA required. Summary IAS for other amendments.
Title of related legislative or regulatory instrument	<i>Transport and Other Legislation Amendment Regulation 2026</i>
Date of issue	December 2025

Proposal type	Details
<p>No RIA is required</p>	<p>Omit prescriptive provisions about equipment for off-road passenger services</p> <p><i>The proposal is deregulatory in nature and does not increase costs or regulatory burden on business or the community so regulatory impact analysis is not required under the Better Regulation Policy.</i></p> <p>Currently, the <i>Transport Operations (Passenger Transport) Regulation 2018</i> (the PT Regulation), Schedule 5, requires specific equipment to be fitted to off-road passenger vehicles providing tourist services. This equipment includes, for example, a fire extinguisher and either a satellite phone or Royal Flying Doctor radio.</p> <p>This prescribed list may not be appropriate for all off-road passenger services and, depending on the nature of the service, additional equipment may be necessary. The issue of carrying safety equipment can be managed appropriately through the new safety management framework (discussed in more detail below) without compromising passenger safety.</p> <p>This requirement will be omitted from the PT Regulation.</p>
<p>No RIA is required</p>	<p>Consequential amendments</p> <p>Consequential amendments include updates to section references and transitional provisions to support a smooth transition for matters from the <i>Transport Operations (Passenger Transport) Standard 2010</i> to the PT Regulation.</p> <p>Amendments to clarify that non-compliance with safety duties or safety management plans are grounds for administrative action to refuse, amend, suspend, cancel or immediately suspend an operator accreditation or driver authorisation merely assist industry understand potential consequences. If these amendments were not made, the department would likely still be able to rely on existing grounds for administrative action in these circumstances, for example, the public interest.</p>
<p>No RIA is required</p>	<p>Clarification of immediate suspension process</p> <p>Currently, under the PT Regulation, an immediate suspension does not end until there has been a decision to amend, suspend or cancel the person's operator accreditation or driver authorisation, or 56 days have elapsed since the person was given notice of the immediate suspension. It is proposed to allow for an earlier end to immediate suspension where the matter is resolved quickly and without the need to amend, suspend or cancel the person's approval. This will allow the approval holder to return to work more quickly. It is proposed to amend the PT Regulation to allow the chief executive to issue a notice for an earlier end to the immediate suspension period.</p>

Summary IAS

Background and context

Safety of road-based public passenger services

Thousands of Queenslanders rely on road-based public passenger services to get to work, school, health care facilities, access groceries and other services, and stay connected with their friends and family. Over 121 million trips were recorded on TMR-contracted general route bus services alone in 2024. This does not include school services or privately run bus operations.

Road-based public passenger services provide economic benefits for individuals (for example, reduced costs compared to vehicle ownership, and increased accessibility) and the community more broadly (for example, reduced emissions, and reduced congestion).¹

Safety is an important consideration for how people choose to travel,² and hence is critical to realising the viability of road-based public passenger services and the resulting economic benefits.

Additionally, while road-based public passenger services are low contributors to the road toll, even one additional serious crash involving a fully loaded heavy bus, for example, could result in multiple fatalities or serious injuries with a devastating impact on families and communities and significant economic costs. Ensuring services are as safe as possible minimises the costs to the community that arise from serious crashes.

Promoting the safety of road-based public passenger transport users is therefore an important public policy objective.

Legislative context of proposed amendments

The *Transport Operations (Passenger Transport) Act 1994* (PT Act) regulates a broad range of public passenger services that includes, for example, road-based services which are the subject of this IAS such as buses, taxis, limousines, booked hire, and tourist coach services.

The objectives of the PT Act are to achieve the best possible public passenger transport, at a reasonable cost to the community and government, while keeping government regulation to a minimum, and promoting the safety of persons using public passenger transport.

The PT Act is supported by the *Transport Operations (Passenger Transport) Regulation 2018* (the PT Regulation) and the *Transport Operations (the Passenger Transport) Standard 2010* (PT Standard).

The PT Standard imposes standards about the operation, design, maintenance and management of some road-based public passenger vehicles and services. These requirements are predominantly imposed in the interest of safety. The PT Standard is scheduled to expire in August 2026 under section 54 of the *Statutory Instruments Act 1992*.

During the last 10 years the PT Standard was subject to only one significant review. In 2017 as part of the reform of Queensland's personalised transport industry, a duty-based safety approach was applied to taxis and booked hire services, with the PT Standard provisions about these services being removed.³

In February 2024, the *Transport and Other Legislation Amendment Act 2024* (TOLAA) was passed by the Queensland Parliament. Once fully commenced, TOLAA will extend, with minor updates, the duty-based approach that applies to personalised transport (taxi and booked hire) services under the PT Act, so that risk-based safety duties apply to all road-based public passenger services.

¹ Alhassan, J. & Ancaes, P. (2025). Public transport investments as generators of economic and social activity. *Journal of Transport & Health*, 41, Article 101989. <https://doi.org/10.1016/j.jth.2025.101989>

² Ibrahim, M. (2024). *Modal Choice, Modal Shift and Transport Safety*. [Doctoral dissertation, Monash University]. Monash Bridges. <https://doi.org/10.26180/27774105.v1>

³ Other amendments of note since the PT Standard was first made include:

- In 2011, the maximum age for open classification heavy buses was extended from 15 years to 25 years (30 years with a 5-year service life extension).
- In 2016, the maximum age limits for forward control passenger vehicles and off-road passenger vehicles were removed.

TOLAA will also omit Chapter 9 of the PT Act, removing the head of power for the PT Standard.⁴

Part 1 of this IAS concerns amendments to the PT Regulation resulting from a review of the PT Standard.

To complement the more consistent safety duties, TOLAA introduced new safety management plan requirements and consolidated and extended existing auditing provisions to ensure there is a consistent audit and directions framework for road-based public passenger services.

Part 2 of the IAS addresses administrative requirements for safety management plans and audits.

Part 1: Amendments to PT Regulation resulting from a review of the PT Standard

What is the nature, size and scope of the problem? What are the objectives of government action?

An opportunity to review, streamline and modernise the approach to regulation for the matters currently regulated in the PT Standard was presented by the introduction of the risk-based safety management framework in the TOLAA, and the expiry of, and removal of the head of power for, the PT Standard. The focus of that review was to ensure continuing safety for passengers, drivers and other road users while ensuring any adverse economic impacts would be minimised through efficient, effective, and practical regulation. Its intent was to maximise the positive impacts on all stakeholders, including operators, drivers, passengers and the broader communities benefiting from these services, while ensuring no stakeholders would be worse off than under the current arrangements.

Size and scope of the services and entities regulated by the PT Standard

The PT Standard applies to a range of road-based public passenger services including scheduled services, such as general route or school services, tourist services, and long-distance services. As noted above, these services provide Queenslanders with access to work, education, shopping, medical treatment, leisure activities and help people stay connected to family, friends and their community. However, the PT Standard does not apply to a taxi service or booked hire service.⁵

TMR has limited data on the types and numbers of vehicles providing services that are regulated,⁶ with the available information generally focused on bus services contracted to TMR. Due to the higher passenger capacity of buses, they are believed to account for most passenger trips regulated by the PT Standard⁷ and so buses are the focus of this part of the IAS. The PT Standard does regulate services involving smaller vehicles, including for example, tourist services in the wilderness, motorbike tourism, general route or demand response services provided by smaller vehicles and, in theory, any new type of passenger transport services for which operator accreditation is required. While operator accreditation is required for these services and operators may be audited, TMR does not hold data about vehicles, passenger numbers and trips and it would be difficult to obtain this information.

An indication of the scope of services provided in Queensland that are currently regulated through the PT Standard and the number of passengers benefitting from those services is illustrated by the following information about scheduled bus services provided under contract to TMR:

- During 2024:

⁴ Chapter 9 (Standards) deals with the making of standards under the Act.

⁵ However, see discussion of categories of driver regulated under Part 3 below.

⁶ TMR holds records of operator accreditation, but not on the type or number of services or the type or number of vehicles used.

⁷ Bus is defined in the PT Act as a motor vehicle with seating capacity for 9 or more passengers (excluding the driver).

- more than 112.9 million trips were made on bus services provided by accredited operators under contract to TMR in South-East Queensland.
- more than 8.8 million trips were undertaken on regional bus services under Regional Urban Bus Service Contracts.
- over 79,000 trips were undertaken on long-distance coach services under contract to TMR.
- In the 2025 school year, TMR is also administering Prescribed School Service Contracts (PSSC) that cover over 1900 schools throughout Queensland. These PSSC arrangements involve:
 - The School Transport Assistance Scheme (STAS), wherein around 410 school bus service delivery partners across the state transport approximately 97,000 registered students to school.
 - The Specialist School Transport (SST) program, funded by the Department of Education, wherein TMR manages services under contracts and funding agreements to deliver school transport for students with disability.

It should be noted that accredited operators also provide bus services outside of state contracts or funding arrangements, and TMR does not have access to equivalent data for these services. For example, PSSC service delivery partners may also provide transport for non-STAS eligible students under a charter or private commercial arrangement. There are also private tourist and long-distance coach services not covered by the above data.

Regulated services must be provided by accredited operators and authorised drivers, except where they are a community transport service or courtesy transport service that meets certain requirements or a locally significant event service.⁸

Part 3 of the PT Standard regulates the driver of a public passenger vehicle that is a 'relevant vehicle'.⁹ This excludes drivers providing a taxi service or booked hire service, e.g. ride-booking or limousine services.

As at 1 June 2025, TMR estimates there are about 24,000 drivers regulated under the PT Standard out of a total of 57,161 holders of driver authorisations.¹⁰

Part 4 of the PT Standard includes requirements on operators of public passenger services for which operator accreditation is required.¹¹ Operator accreditation is a mandatory qualification that allows the holder to operate a public passenger service. Road-based public passenger services which are exempt include booked hire services, taxi services and some courtesy and community transport services.

As at 1 June 2025, there were 1,209 holders of an operator accreditation. These range from large fleet companies to smaller, family-run businesses.

Objective – ensuring safety of regulated services

⁸ See PT Regulation, section 19 and 69.

⁹ PT Standard, section 5 and schedule 4 (Dictionary), definition of 'relevant vehicle'.

¹⁰ The total number can be broken down into three categories and there are drivers in each category who will be regulated:

- Booked Hire/Taxi (BHTX): 33,314. This authorises the holder to drive any public passenger service for which driver authorisation is required, including those that can be driven under a General authorisation. The PT Standard may regulate some BHTX holders. For example, if a BHTX holder works part-time as a taxi driver and part-time as a bus driver, the PT Standard applies to them in their capacity as a bus driver. There is no data on the quantity of affected drivers.
- General: 22,839. This authorises the holder to provide any public passenger service for which driver authorisation is required, except a booked hire or taxi service. The PT Standard regulates all holders of General driver authorisations.
- Restricted (RDA): 1,008. This authorises the holder to provide community or courtesy services but only for the operator who issued the restricted driver authorisation. The PT Standard regulates all holders of RDA driver authorisations.

¹¹ Section 18 of the PT Standard references that the Standard applies to applicants for operator accreditation and operators of relevant services. **Relevant service** is defined in schedule 4 (Dictionary) as a service for which operator accreditation is required.

The objective of the proposed amendments is to ensure the safety of the regulated services by prescribing specific requirements, where appropriate, to complement the safety management framework which will be implemented in the PT Act, and safety requirements in other relevant transport legislation.

The benefits of safe public passenger transport services include reduction in the costs arising from serious crashes, as well as promoting public confidence in services leading to maintained or increasing patronage of services with benefits such as improved environmental outcomes.

Nature of the problem – safety of regulated services

Road trauma cost Queenslanders an estimated \$6 billion in 2020, in addition to the significant impacts on our health system, where road trauma accounts for approximately 15% of annual hospital admissions.¹²

Crashes involving buses contribute to this cost. Over the ten years from 2015-2024, 1.56% of Queensland's road fatalities involved buses.¹³ This includes all road fatalities where a bus was involved, meaning it includes fatalities where other road users were at fault and fatalities to other road users resulting from collisions with a bus. Bus occupants (that is passengers and drivers) comprise a minority of the total casualties resulting from serious crashes involving buses, as illustrated below.

While buses make a relatively small contribution to the overall road toll, continuing to closely monitor the safety of buses is critical because buses have the capacity to carry large numbers of people, including standing passengers. This means that a single bus crash has the potential to cause significantly more injuries or fatalities than a single car crash.

The above data is for crashes that have occurred under the current regulation state with the PT Standard in force. While it is almost certain that crashes would increase if there was no such regulation, it is not possible to estimate to what extent the current relatively low rate of bus crashes is due to the current regulation state. Also, the current regulation state will not be continued exactly under any of the options for consideration in the IAS because the new safety framework will be established in the PT Act.

TMR road crash data shows there are a range of factors that can contribute to serious crashes including behaviour of the bus drivers, other drivers or other road users, weather and environmental factors, and vehicle defects. Some of these factors are outside the scope of the PT Standard, but vehicle defects may be linked to matters regulated by the PT Standard. Advice from consultants engaged by TMR showed that older buses are more likely to have defects due to age-related deterioration. For example, a study of routine inspections of buses in Victoria found that 15-year-old buses were twice as likely to fail routine inspections due to defects than 5-year-old buses.¹⁴ Older buses may not have the latest safety features which is also a relevant consideration. Additionally, the PT Standard contains some provisions that affect the safety of passengers in the event of a serious crash, such as prescriptions regarding internal padding. These provisions are relevant regardless of the cause of the crash. As such, in assessing the scope of what is currently regulated by the PT Standard, it is relevant to consider all serious crashes involving buses.

TMR's road safety data provides further detail on the current extent of fatalities and serious injuries arising from bus crashes in Queensland. From 1 January 2014 to 31 December 2023, there were:

¹² Department of Transport & Main Roads. *Queensland Road Safety Strategy 2022-2031*.

<https://www.publications.qld.gov.au/dataset/7b4a31c7-db50-4e5c-84d2-023446d4c1e6/resource/d28d7b57-2e59-456c-810d-5a4cf9654ddb/download/queensland-road-safety-strategy-2022-31.pdf>, page 2.

¹³ Bureau of Infrastructure and Transport Research and Economics. (2025, April update) *Australian Road Deaths Database: Fatalities 2025-04*. Accessible at:

<https://catalogue.data.infrastructure.gov.au/dataset/australian-road-deaths-database>

¹⁴ Qiu, J. (2020). *Bus companies and roadworthiness: an in-depth analysis of the factors influencing inspection and incident outcomes* [Doctoral dissertation, Monash University]. Monash Bridges.

<https://doi.org/10.26180/5f50522d81050>.

Specifically, Qiu (2020, p.113) finds that the risk of a bus failing routine inspections due to defects rises by 8% with each year of age. This means that every ten years, the risk of defects causing inspection failure doubles.

- 462 serious crashes involving heavy buses, including 21 fatal crashes and 441 crashes resulting in hospitalisation. This represents a low proportion of total serious crashes in Queensland, ranging from 2.2% in 2014 to 1.2% in 2023. These crashes resulted in 21 fatalities and 623 people hospitalised. Of these 644 total casualties:
 - 204 (31.7%) were occupants of a heavy bus. 152 of these were bus passengers (24.7% of total), while 52 (7%) were bus drivers.
 - Vehicle defects are assessed to have contributed to 3 of the 644 casualties (0.5%).
- 329 serious crashes involving light buses, including 11 fatal crashes and 318 crashes resulting in hospitalisations. These crashes resulted in 13 fatalities and 504 hospitalisations. Of these 517 total casualties:
 - 264 (51%) were occupants of a light bus. 165 of these were bus passengers (31.1% of total) while 99 (19.9%) were bus drivers.
 - Vehicle defects are assessed to have contributed to 10 of the 517 casualties (1.9%).

While it is impossible to accurately predict the likelihood of crashes, fatalities or serious injuries under the various regulatory options discussed in this IAS, estimates of the social cost of road crashes provide a sense of the scale of costs involved. A 2022 report for the Bureau of Infrastructure and Transport Research Economics (BIRTE) prepared by the Australian National University investigated the social cost of road crashes.¹⁵ The report estimated social costs per road casualty¹⁶ in 2020 dollars as follows:

- \$2.9 million per fatality (or \$3.46 million escalated to 2024 dollars¹⁷),
- \$241,100 per hospitalised injury (or \$2887,861 escalated to 2024 dollars),
- \$26,000 per non-hospitalised injury (or \$31,056 escalated to 2024 dollars).

Most heavy buses used for Translink-branded services have a maximum capacity of more than 70 passengers. For example, TMR currently funds Volvo, Volgren B8RLE Optimus two-door low-floor buses to provide Translink-branded general route services. This bus has a maximum capacity of 43 seated passengers (without wheelchairs) and 35 standing passengers (without wheelchairs). TMR's data shows that during peak hour, some buses will have between 40 – 70 passengers at some time in the trip. If a fully loaded bus is involved in a serious crash, there is a risk that all passengers and the driver may be injured or even killed, with significant social costs. Even relatively small bus crashes incur substantial social costs.

For example, on 30 June 2024 at Gumlu, north of Bowen in Queensland, a crash involving a bus carrying 33 passengers and a four-wheeled-drive vehicle towing a caravan resulted in three of the bus passengers dying, three hospitalised casualties, three medically treated casualties and one minor injury. Applying the average social cost estimates developed for the BIRTE, suggests an estimated social cost for these casualties of more than \$11.35 million. Accounting for the significant costs that resulted from disruptions to traffic on the Bruce Highway means the total cost of such a crash would likely have exceeded \$12 million. In addition, such a crash would likely decrease public confidence in the safety of services. This may lead to further long-term negative outcomes by encouraging a shift toward less economically and environmentally efficient modes of transport, such as private car travel.

While the likelihood of such a serious bus crash under various regulatory options is not possible to predict, these estimates highlight the magnitude of potential social costs. Safety must therefore be considered a

¹⁵ Steinhauser, R., Lancsar, E., Bourke, S., Munira, L., Breunig, R., Gruen, R., Dobes, L., Bulfone, L., Glass, K., Gordon, C., & Cox, J. (2022). Social Cost of Road Crashes. The Australian National University. <https://www.bitre.gov.au/sites/default/files/documents/social-cost-of-road-crashes.pdf>

¹⁶ Ibid, page 17.

¹⁷ Escalation was calculated using the inflation calculator on the Reserve Bank of Australia website. <https://www.rba.gov.au/calculator/annualDecimal.html>

primary impact of the matters regulated by the PT Standard. Any reduction in safety standards carries the potential of very significant economic, social and emotional costs that must be considered.

What options were considered?

The following options were considered to address the issue of the expiry of the PT Standard.

Option 1 – Discontinue prescriptive regulation of all matters currently in the PT Standard¹⁸

This option would allow the PT Standard to expire without transitioning any of the prescriptive safety requirements into the PT Regulation. The new safety management framework would be relied on to manage all safety risks currently regulated by the PT Standard.

Option 2 – Transition all matters from the PT Standard into regulations

This would maintain the prescriptive approach to safety. It would continue the existing requirements for industry, in addition to the new safety management framework.

Option 3 – Transition some, but not all, matters from the PT Standard into regulations to maintain safety outcomes

This option would allow the risk-based approach of the new safety management framework to manage most of the prescriptive requirements from the PT Standard. Specific regulation of safety-critical risks would be transitioned into the PT Regulation, while matters that can be effectively managed through other means would be allowed to expire.

Matters that would be allowed to expire include:

- Driver licensing requirement (sections 6 and 7) because this is effectively regulated through the *Transport Operations (Road Use Management) Act 1995* (TORUM) and its regulations.
- Operators to ensure vehicles are covered by compulsory third party insurance because there is an existing obligation on a person not to drive or an owner not to permit someone to drive an uninsured motor vehicle on a road or in a public place, under the *Motor Accident Insurance Act 1994*, and operators using uninsured vehicles has not been a prevalent issue and doesn't make vehicles unsafe.
- Alcohol and drug requirements (section 9) because this is effectively regulated through TORUM and its regulations.
- General obligations about operational safety of vehicles (sections 11(1) and 22(1)) because this will be effectively regulated through the safety management framework, with prescriptive regulation of targeted matters as discussed below.
- Overloading (sections 11(2)(a) and 22(2)(a)) because this is effectively regulated through TORUM and its regulations and the *Heavy Vehicle National Law (Qld)* (HVNL).
- Standing passengers for long distance and tourist services (sections 11(2)(b) and 22(2)(b)) because this will be effectively managed through the safety management framework and the requirement for standing passengers only to be allowed on buses designed and manufactured for standing passengers.
- Customer service requirements (sections 13, 31, 33 and 39 to 41) because these will be managed through effective business decisions.
- Requirements for drivers to comply with TORUM and HVNL including vehicle standards legislation (sections 14 and 14A) because compliance is already required directly under this legislation. TMR will still be able to refuse an application for driver authorisation or amend, suspend or cancel (as appropriate and subject to procedural fairness via a "show cause" notice) a driver's authorisation if there is non-compliance with relevant provisions of TORUM and HVNL.
- Activating auxiliary brakes (sections 16, schedule 1, section 29(3)) because the safety management framework and vehicle standards requirements will effectively manage these requirements.

¹⁸ Under the Queensland Government's Better Regulation Policy this option would be described as the status quo. However, this term has not been used to avoid confusion for industry as the status quo for them would be continued regulation of all matters contained in the PT Standard.

- Requirements for operators to have incident management plans (sections 34, 35 and 37) as this will be managed through the safety management framework.

What are the impacts?

Option 1 – Discontinue prescriptive regulation of all matters currently in the PT Standard

This option would rely entirely on the new safety management framework to manage safety including for the specific matters currently regulated by the PT Standard.

Relying solely on the safety management framework would provide industry with more flexibility to manage safety in accordance with what they consider is reasonably practicable for the circumstances of their operations. As a result, one potential impact from this option is industry having more scope to develop more efficient and effective ways of managing safety issues, including those factors currently regulated through the PT Standard. Ideally, this approach would reduce costs and maintain or improve safety outcomes.

Operators are already required to manage safety risks under work health and safety laws and the HVNL (for larger vehicles). However, feedback from industry participants during public consultation in late 2022 confirmed some non-compliance with these requirements and a limited passenger transport focus. The new safety management framework will allow TMR to proactively monitor and enforce effective risk management in passenger transport. While the transition to a safety management framework aims to improve safety outcomes, it may take time for the industry to fully adopt the safety management mindset and practices that are required for this. Without prescription of some safety-critical matters, there is a risk of poor safety outcomes during the transition.

Additionally, relying on the safety management framework alone may remove some of the clarity around the minimum expectations for managing critical safety risks. Operators and drivers may lack confidence they are taking actions they are reasonably required to take under their safety duties to manage such risks. These concerns were reflected in industry feedback during consultation.

Relying solely on the safety management framework will also reduce TMR's options for responding to safety issues. Requiring operators or drivers to justify why their accreditation or authorisation (respectively) shouldn't be amended, suspended, or cancelled will be more challenging if there is no breach of a prescribed requirement. TMR will have other enforcement tools under the new safety framework, but its response to unsafe behaviour may initially be less efficient especially as it develops experience in relying on these. This less cost-effective enforcement of safety could reduce deterrence during the transition, increasing the risk of poor safety outcomes.

Option 2 – Transition all matters from the PT Standard into regulations

This option would transition all the prescriptive regulation currently in the PT Standard to the PT Regulation.

While this approach would maintain existing safety requirements and so would not compromise safety outcomes, it would be inconsistent with the introduction of a new risk-based safety management framework and there is a risk that the benefits of the new framework will not be realised. This may lead to duplication of obligations and would provide less flexibility for operators to find innovative and potentially more efficient and effective ways of managing safety issues because they would be required to comply with prescriptive obligations.

While continuing to regulate all matters in the PT Standard would essentially be no change for industry compared to the current requirements, maintaining outdated provisions may result in industry being subject to some unnecessary regulatory burden, and could ultimately frustrate the overall objectives of the new risk-based management framework.

Option 3 – Transition some, but not all, matters from the PT Standard into regulations to maintain safety outcomes

This option will retain some regulation and associated costs currently incurred by industry compared to letting the PT Standard expire under Option 1. The regulation being retained under this option has been longstanding and will generally be reflected in long term business planning and investments. Where there is a cost impact for operators for retaining the requirements, the marginal impact is generally low, particularly in the context of operators concurrently having to comply with the safety management framework.

However, this option will reduce some regulation and costs for industry compared to Option 2 which maintains the current level of prescription. The review of the PT Standard identified many matters currently regulated in the PT Standard which can expire where there is a low risk of safety being compromised.

Broadly, allowing these provisions to expire reduces prescriptive requirements and will have the impact of allowing operators and drivers more flexibility to manage the safety matters in accordance with what is 'reasonably practicable' under the safety management framework.

This option would ensure operators and drivers have a clear understanding of certain minimum critical safety requirements. Where there is a breach of these minimum standards, TMR will be able to promptly identify and act efficiently to maintain safety levels.

This option is consistent with the risk-based approach of the new safety management framework. It reduces duplication and removes regulation as much as possible, where its removal does not compromise safety. The following matters would transition (subject to minor variations to the current approach discussed later in this document):

- o Requirements for operators and drivers to comply with *The Code of Conduct for School Students Travelling on Buses*

The Code of Conduct for School Students Travelling on Buses (the Code) provides guidance about managing school students providing some clarity for operators, drivers, students and parents.

Impact: The Code is developed in consultation with stakeholder representative groups, including parents, schools and those involved in transporting school children. It provides a reasonably effective and efficient way of consistently managing the complex issue of behaviour on school transport, and offers operators and drivers, as well as parents, schools and students, clarity about expectations, and confidence that what they do is acceptable. Generally, the obligations on drivers and operators prioritise the safety of services and include matters that would ordinarily be part of sound business practice such as being respectful to parents and students. Importantly, the Code also classifies student conduct and provides procedures for drivers, operators and other stakeholders to follow in responding to incidents of misconduct. These procedures require actions that would ordinarily be expected, for example (1) drivers should stop the bus and contact emergency services if there is a life-threatening incident, but (2) in less serious incidents, the driver may instruct the student to stop the behaviour and use behaviour management strategies such as requiring the student to sit at the front of the bus. Operators must follow a process when deciding the consequence for reported misconduct. These range from possible written warning for irresponsible behaviour, to refusing travel for more serious matters. There is also a complaint and review process, to provide certainty to all parties involved. Failure to comply will not be an offence but will allow the TMR to issue a direction to comply or instigate action to amend, suspend or cancel (as appropriate and subject to procedural fairness via a "show cause" notice) an operator's accreditation or driver's authorisation. Past non-compliance may also be grounds for refusal of an application for operator accreditation or driver authorisation. Mandating compliance with the Code also saves drivers and operators researching and implementing their own approach to managing student behaviour. While formalising the activities outlined in the Code may potentially require drivers and operators to follow steps they may not otherwise have followed, without the Code to establish what is acceptable practice, drivers and operators may be exposed to more complaints or even legal actions or contractual consequences which may involve costs. As a result, there should only be a minimal marginal impact on operators and drivers above what they would ordinarily be doing to ensure the safe transport of school children under the safety management framework.

o Required training for operator accreditation

Training of operators ensures they have at least a minimum level of understanding about safety issues relating to providing services. Operators who are not aware of their obligations may provide unsafe services and are likely to be subject to enforcement action. Training nominated by the chief executive of TMR through a notice will assist operators to build their knowledge, enabling them to reduce their risks of noncompliance while maintaining safety standards.

Impact: The operator training requirements under Option 3 will likely come at a reduced cost compared to longstanding practice in Queensland under the PT Standard as they required completion of an assessable workbook and having it assessed by an approved OA workbook assessor both of which had to be paid for by the operator.¹⁹ However, training requirements will still impose some cost on operators due to the time involved in completing training. Compared to Option 1, the cost is broadly estimated to be at least \$920 but will depend on what specific training is nominated by TMR (which is transitioning the training from the workbooks to online training which has not yet been piloted but is currently estimated to take about 15 hours) and the hourly cost of an operator's time (which is estimated to be at least \$61.25 per hour²⁰ but may be significantly more depending on the size of the business among other things). However, required training may also reduce operators' costs by providing clarity on what is required to meet safety standards, thereby relieving operators from the need to spend time considering this themselves. This clarity may also benefit operators by reducing their risk of facing administrative or enforcement action for not meeting their obligations.

On balance, these training requirements would have a neutral or positive marginal impact on operators.

In 2024, there were approximately 200 persons required to undertake required training for operator accreditation, and this is likely to be indicative of future numbers. The total compliance cost to business is therefore \$0.183 million in the full first year and \$1.381 million for the first 10 years.²¹

If there is no ability for TMR to nominate training requirements and this leads to poor safety outcomes, the potential impacts and costs are significant as discussed earlier in this paper.

o Minimum driver training requirements

Under the safety management framework, operators will need to ensure drivers are provided sufficient information to perform their role safely. TMR nominating required training for drivers ensures they have at least a minimum level of understanding about safety issues relating to providing services. To provide greater clarity for operators and simplicity as part of the transition, the required training will be published in a training notice on TMR's website.

Impact: Compared to Option 1, driver training requirements will impose some cost on operators due to the time involved in drivers completing training. The cost will depend on what specific training is nominated by TMR and how the operators choose to deliver it. The cost of undertaking training is broadly estimated to be \$430 per driver with the number of drivers varying significantly depending on the size of the business (among other things).

In 2024, TMR estimates that approximately 6000 persons were required to undertake driver training for relevant services, and this is likely to be indicative of future numbers. The total estimated direct compliance cost to business based on 6000 persons undertaking training is \$0.643 million in the full first year and \$4.833 million for the first 10 years.

This estimate is based on the following assumptions:

- *Operators require their drivers to spend about 7 hours undertaking training to meet the requirements at a cost to operators of approximately \$61.25 per hour²².*
- *In the absence of regulation, operators would already undertake at least 75% of this training to meet their work health and safety obligations.*

This figure does not include any of the benefits which nominated training is likely to provide for operators by saving them time through providing clarity on minimum requirements for driver training and confidence that their drivers are equipped to provide safe services.

On balance, driver training requirements would have a neutral or positive marginal impact on operators.

Safe drivers are essential to safe public passenger services. If there is no ability for TMR to nominate driver training requirements and this leads to poor safety outcomes, the potential impacts and costs are significant as discussed earlier in this paper.

o Requirements for compliance with relevant heavy vehicle or light vehicle standards

Requiring operators to only provide services using vehicles that comply with relevant design and safety standards ensures vehicles are of a safe design and construction.

Impact: The marginal cost of these amendments for operators will be minimal because:

- *heavy vehicles are already required to comply with the heavy vehicle standards under the Heavy Vehicle National Law (Qld) (HVNL).*
- *light vehicles are already required to comply with the light vehicle standards under the Transport Operations (Road Use Management – Vehicle Standards and Safety) Regulation 2021 (VSS Regulation).*

However, under Option 1, as the existing requirements in the HVNL or VSS Regulation only apply to the driver of the vehicle or a person permitting the use of the vehicle, they do not apply to an operator who is not driving the vehicle or is not the owner of the vehicle. Information held by TMR on vehicle ownership and operator accreditation does not allow an estimate of how many vehicles used by operators to provide a service are not also either driven by the operator or owned by the operator. However, it is known to be at least several hundred and thought to be much more significant. As a result, relying on the HVNL or VSS Regulation impedes TMR's ability to issue a direction to comply, refuse an application for renewal of operator accreditation, or commence action to amend, suspend or cancel (as appropriate and subject to procedural fairness via a "show cause" notice) an operator's accreditation if the operator allocates unsafe vehicles they don't own to drivers. Requiring all operators to only use compliant vehicles for services means that all operators face the same requirements regardless of whether they personally own or drive the vehicle.

The safety management framework also implies compliance with these vehicle standards and means operators must have systems in place to ensure vehicles used for services are safe. However, specifying that vehicles must comply with particular safety specifications ensures efficient and targeted audit and enforcement action can be taken for non-compliance.

If there is no ability for TMR to act against operators for using non-compliant vehicles and this leads to poor safety outcomes, the potential impacts and costs may be significant as discussed earlier in this paper.

¹⁹ Due to moving the training online, operators will no longer incur the cost of the workbook and assessment which total about \$260.

²⁰ This hourly cost for an operator is based on an hourly wage rate of \$35 which would apply to some bus drivers multiplied by 1.75 to reflect on costs of employment, such as superannuation. Queensland Government funding is raising wages to \$35 per hour for Translink-contracted urban bus drivers and \$31.17 for Translink-contracted school bus drivers. It is acknowledged that not all operators will be drivers and the funding boost to raised driver wages will not apply to all services falling under the training requirement.

²¹ Calculated using the direct costs calculator tool (available at www.treasury.qld.gov.au/betterregulation) using a discount rate of 7%.

²² The hourly cost for a driver is based on an hourly wage rate of \$35 which would apply to some bus drivers multiplied by 1.75 to reflect on costs of employment, such as superannuation. Queensland Government funding is raising wages to \$35 per hour for Translink-contracted urban bus drivers and \$31.17 for Translink-contracted school bus drivers. It is acknowledged that the funding boost to raise driver wages will not apply to all services falling under the training requirement. The lowest wage rate (Grade 2) under the Passenger Vehicle Award is \$26.70 in 2025-26.

- Compliance with certificate of inspection requirements

Requiring operators to obtain vehicle inspections, including annual inspections, provides a basic check of vehicle condition, ensuring TMR can monitor the safety of vehicles used to provide public passenger transport. Public passenger vehicles are already required to be inspected at least annually under provisions in the VSS Regulation. However, under that legislation the obligation falls to the vehicle owners. The transitioning provision would ensure that operators who do not own vehicles must still ensure that vehicles they use to provide services have their certificate of inspection. Failing to comply with this will mean the operator may be subject to a direction to comply and ultimately action to amend, suspend or cancel (as appropriate and subject to procedural fairness via a “show cause” notice) their accreditation. Past non-compliance may also be grounds for refusing renewal of their operator accreditation.

Impact: Operators who own the vehicles they use are already required to obtain certificates of inspection under the VSS Regulation, so they will not be affected by this requirement. Operators who do not own the vehicles they use may face some marginal costs, primarily the cost of checking that the vehicle has had an annual inspection. Without this requirement, TMR will be unable to take direct action against a service operator who uses vehicles owned by others that are non-compliant and may potentially have undetected safety defects. Individual buses may be taken out of service due to action against the owner. If there is no ability for TMR to act against operators for using non-compliant vehicles²³, they may use other potentially unsafe vehicles. This could result in poor safety outcomes where the potential impacts and costs are significant as discussed earlier in this paper. There is also potential for this practice to erode public confidence in the safety of public passenger services.

- Incident reporting²⁴

Operators will no longer be required to construct an incident management plan. However, they will still be required to prepare an incident report within 24 hours of an incident.²⁵ In addition, for school services, operators will be required to ensure schools or parents are notified about a disruption to the service.

Impact: The requirement to prepare a report about an incident within 24 hours ensures relevant information is recorded so it can be used by the operator when considering the review of their safety management plan. The requirements for the report are quite administrative/observational in nature: details of operator and driver, time, date, place, nature of the incident, where passengers standing/seated, how many people were injured and apparent nature of the injuries (this is not intended to require medical assessments), details of the vehicle involved and any damage and whether it was moving or stationary, any help provided at the time of the incident, and actions taken in response to the incident as well as preventative actions to avoid future incidents. Depending on the sophistication of the operator, TMR estimates it would generally take 5-15 minutes²⁶ to prepare a report but for a very serious incident might take several hours. Therefore, report preparation is generally estimated to cost \$5-\$15²⁷. TMR does not have data on how many incident reports are prepared, but the total direct costs are not considered significant in the context of the low cost of preparing the reports.

The requirement to provide advice to schools or parents about the disruption will assist schools and parents to make safe transport arrangements for children using the service. Compared to option 1, these requirements will have a low marginal cost on operators, and preparing an incident report promptly may provide a minor marginal benefit by aiding their review of safety management plans. This will assist operators to deliver safe services. If operators are not required to complete incident reports within 24 hours of an incident, this may lead to incident details being lost in some cases, potentially impacting the ability of operators to adapt their safety management plans, leading to worse safety outcomes. The potential impacts and costs of poor safety outcomes may be significant as discussed earlier in this paper.

- Warning signs and lights on school buses

Both light and heavy vehicles used as school buses must be fitted with flashing lights and signs that activate when children are boarding or leaving the bus.²⁸ This is so that other drivers are aware of children in the vicinity.²⁹ Queensland-specific specifications for these lights and signs will be expired and nationally agreed specifications will apply. For light school buses, the VSS Regulation will be amended to adopt the relevant Australian Light Vehicle Standards Rules (ALVSR). For heavy buses, the repeal of the PT Standard will mean the HVNL(Qld) will automatically apply.

Impact: The proposed approach under option 3 will allow operators to avoid the cost of modifications to Queensland-specific specifications where their vehicle complies with the national specifications

(exact costs for modifications vary between vehicle type and provider of modification). This approach will promote national consistency compared to Option 1. An exemption notice (heavy vehicles) and safe movement guideline (light vehicles) will be used to ensure existing vehicles will be allowed to continue to operate without further modification provided they continue to comply with the PT Standard as in force before it was repealed. This approach will mean savings for operators compared to Option 2 without compromising safety outcomes. In addition, while the national provisions apply to all buses mainly used for carrying children, an exemption notice and safe movement guidelines will be used to ensure the warning lights and signs requirements continue to only apply to school buses as defined in Queensland and to facilitate short term replacement buses where a compliant bus is not available.

o Vehicle maintenance record keeping requirements

Requiring operators to keep records of vehicle maintenance provides important information for audits about how vehicle condition is being managed.

Impact: Under the safety management framework, operators will need to have systems in place to ensure the safety of the vehicles they use to provide services. Record keeping about vehicle servicing and maintenance is a generally accepted component of such a system. Continuing a specific requirement in a regulation will provide clarity for operators about ensuring vehicles are serviced and maintained, record-keeping about these activities, and timeframes for keeping these records. The marginal cost for operators should be minimal.

As a result of the requirement, the information for vehicle maintenance records should be easily obtainable in the ordinary course of their business, making it easier for businesses to produce the information and TMR to monitor vehicle condition. In addition, specific prescription provides a trigger for a direction to comply or action to amend, suspend or cancel (as appropriate and subject to procedural fairness via a "show cause" notice) an operator's accreditation if required, supporting effective and efficient enforcement action by TMR. Past non-compliance will also be grounds for refusing an application for operator accreditation.

²³ Actions available to TMR against an operator of a non-compliant vehicle include amending, suspending or cancelling their operator accreditation.

²⁴ Current requirements would only be partially transitioned because the requirement to have an incident management plan is being replaced by the new requirement to have a Safety Management Plan. See Part 2 of this IAS for an explanation of safety management plans.

²⁵ See PT Standard, section 4 for a definition of 'incident'.

²⁶ Note that this does not include associated activities that an operator may need to undertake to meet their safety duties such as investigating what occurred, reviewing the adequacies of their safety measures, and implementing changes if required.

²⁷ Assuming an hourly wage rate of \$35 which would apply to some bus drivers multiplied by 1.75 to reflect on costs of employment such as superannuation.

²⁸ 'School bus' has a particular meaning in the relevant legislation. It refers to a bus being used to provide a scheduled passenger service only or primarily for the transport of school students to and from school (other than for school excursions) on days that schools are open for instruction, even if the bus is used for other purposes at other times. However, the definition only extends to buses where the service is in an area outside, or partly outside, a "defined urban area" comprising the Brisbane City Council area and other areas where services may only be provided under a service contract with TMR.

²⁹ Under the recommended option, the current requirements would be transitioned with amendments to adopt nationally consistent vehicle standards and reduce duplication. Adopting national standards will relieve operators of the costs of modifying vehicles, manufactured to Australian standards, to be compliant with Queensland requirements. Exemptions would be applied to the existing fleet and regarding specified urban areas to maintain the status quo. See also the related amendment to s222A of the Queensland Road Rules discussed below.

○ Allowing three-for-two seating in certain circumstances

Transitioning this provision maximises bus capacity while still ensuring safety by clarifying that only one adult passenger may occupy a single seat, while allowing three-for-two seating for children under the age of 12 if the seat is a bench seat designed for two adults.³⁰

Impact: This amendment provides clarity about when three for two seating may be permitted, ensuring vehicles can operate to capacity safely. Allowing three-for-two seating for children 12 years or under maximises bus capacity while ensuring safety of services is maintained. Under Option 1, there would be no prescription regarding how many passengers may occupy a single seat. Compared to Option 1, clarifying when three-for-two seating is allowed may impose a cost upon operators resulting from drivers spending time enforcing seating rules and an opportunity cost due to not being able to charge fares for additional passengers. However, the safety management framework would already require operators to ensure safe seating arrangements so the marginal cost due to prescribing a consistent rule across all operations should be low. Prescribing the rules ensures TMR can take efficient and targeted action where there is non-compliance. If no rule was prescribed under Option 1, it could result in operators allowing three-for-two seating for older persons who do not fit properly on inappropriately designed seats, potentially impacting safety outcomes. The potential impacts and costs of poor safety outcomes are significant as discussed earlier in this paper.

○ Standing passengers

It is proposed to transition provisions requiring:

- drivers and operators to ensure standing passengers are only permitted on vehicles that are designed and constructed for standing passengers,
- drivers and operators to ensure standing passengers are not carried on 'no standing passenger roads', and
- operators of buses carrying school students on 'no standing passenger roads' to ensure vehicles comply with particular Australian Design Rules' requirements regarding rollover strength and occupant protection.

Impact: The proposed amendments ensure there is clarity around specific aspects of carrying standing passengers. The safety management framework will also imply these outcomes, so the marginal impact for operators, compared to Option 1, should be low. However, specifying these requirements ensures TMR can take efficient and targeted action where there is non-compliance.

If TMR does not have this ability and this leads to poor safety outcomes, the potential impacts and costs are significant as discussed earlier in this paper.

○ Specific vehicle type/design requirements including padding

It is proposed to transition requirements for buses operating particular types of services, to comply with specific Australian Design Rules' requirements that may not have applied to the bus when it was manufactured or imported into Australia. This ensures buses providing those services meet design standards appropriate for the service. If this provision is not included, buses with lower safety standards would be able to provide the service. For example, a bus that operates services beyond a radius of 350km, such as a long-distance coach service, must comply with the Australian Design Rules for buses with high back seats that are not designed for standing passengers. This has the effect of mandating that seatbelts be fitted on buses delivering this type of service. Other regional services operating within a radius of 350km may also have high back seats and hence seat belts, or low back seats and hence no seat belts. Buses operating local services may be designed to carry standing passengers and hence would not currently be required to be fitted with seat belts. Buses providing all regional services, local services and school services would need to have padding on hard surfaces that might be struck by the head of a seated passenger who was not wearing a seatbelt if the bus is involved in a frontal collision. New South Wales has similar padding requirements.

Compared to Option 1, retaining the vehicle type/design requirements will impose minimal marginal cost. This is because:

- *All existing vehicles used on these services will already comply with the current requirements.*

- The fleet of regional classification vehicles will be superseded over time by vehicles that comply with a new Australian Design Rule (ADR68/01) from 2026 for all new model vehicles, or 2027 for all new vehicles.
- It is implied that operators will need to consider appropriate mitigation of the risk to passengers of being thrown forward during a crash, under their safety management plan. As a result, it is expected that operators would frequently choose vehicles that meet or even exceed the safety requirements in the relevant circumstances.
- Replacement buses - funding by the School Bus Upgrade Scheme (SchoolBUS), is helping to upgrade buses including for example, increasing the number of school buses being fitted with seatbelts – in the last 12 months to May 2025, 100 per cent of SchoolBUS-funded buses were fitted with seatbelts.

In effect, retaining these requirements only impacts buses being brought into service in Queensland from interstate or when it is proposed to use an existing bus on a different type of service. The requirement provides clarity to remove any doubt about minimum requirements for vehicle type/design under the safety duty. This will avoid the potentially significant impacts and costs of poor safety outcomes, as discussed earlier in this paper.

- Structural repairs must only be done by appropriately qualified tradespeople and inspected by either an authorised officer or an Approved Person.³¹

Impact: Operators will need to pay for the necessary tradesperson to undertake the repairs and the inspection (noting that inspections by authorised officers have no charge). The safety management framework means that operators should have systems in place to ensure vehicles are safe, including ensuring any repairs are done correctly which implies they are undertaken by a person with relevant expertise. Consequently, the marginal costs for operators between what they are required to do under the safety management framework and meeting the specific obligation should be low. Specifying that only appropriately qualified tradespeople may complete structural repairs, and only authorised officers or Approved Persons may complete inspections, provides clear guidance to operators regarding how to ensure repairs and inspections are done correctly. Structural integrity is identified as critical to ensuring a vehicle is as safe as possible in the event of a crash, and assessing whether repairs maintain that structural integrity is important to safety. The potential impacts/costs of poor safety outcomes are significant as discussed earlier in this paper. Including a specific requirement ensures both clarity for operators about this minimum expectation and also provides a trigger for TMR to issue a direction to the operator if this requirement is not met. On balance, compared to Option 1, requiring that structural repairs are done by qualified tradespeople and inspected by either an authorised officer or an Approved Person will have neutral or positive marginal impact on operators.

Provisions about the following matters would also transition from the PT Standard to a regulation. However, assessing the effectiveness and efficiency of these matters was subject to more complex considerations about impacts, and less consensus among stakeholders.

- Maximum vehicle age limits

Operators must not use a heavy or light bus after it reaches the maximum age (10, 20, 25 or even 30 years depending on the vehicle, but mostly 20 years for light buses and 25 years for heavy buses). Operators retain the option to extend the life of heavy buses subject to investment in a thorough inspection and safety feature upgrade.

Impact: There are impacts and costs for operators due to these requirements. These costs may include the cost of replacing a bus when it reaches its maximum age, or the cost of undergoing a structural inspection or upgrade.³² However, these costs will not be incurred by every operator.

³⁰ Under the PT Standard, three-for-two seating is allowed for “primary school or pre-school children”. Under Option 3, this would change to a child under the age of 12, as discussed below under the heading ‘Who was consulted?’.

³¹ An Approved Person holds an accreditation under the *Transport Operations (Road Use Management—Accreditation and Other Provisions) Regulation 2015*. The functions of an Approved Person involve inspecting and certifying vehicle modifications.

³² For an assessment of the cost of structural inspections and upgrades, see the discussions of “Structural inspections for heavy buses”.

TMR does not have comprehensive records regarding the number of bus replacements due to the maximum age of vehicle requirements. There are a range of business drivers that influence the economically viable life span for both light and heavy buses, including increased repair and maintenance costs as the vehicle ages, tax-related depreciation, and the nature of the business activity and environment. Anecdotally, TMR understands that most commercial light buses are retired before they reach maximum age. Where buses would be retired through regular business decisions before reaching their maximum age, this maximum age limit imposes no marginal cost upon operators.

For general route services, TMR does not operate a specific bus replacement program. Instead, buses are funded through fleet payments as a component of monthly service contract payments. The specific details of these contract payments are negotiated by each operator and are commercial in confidence. As a generalisation, however, TMR's funding of urban services provides for all southeast Queensland urban route heavy buses to be replaced between 20 and 21 years and hence operators of these services would never incur an unfunded bus upgrade due to their vehicles needing to be retired by their prescribed maximum age. It would be rare for any urban route services to be operated using buses which were reaching the maximum age.

TMR also assists with funding for bus replacement for some school services, including under the following arrangements:

- The School Bus Upgrade Scheme, provides funding to eligible school bus operators to assist with the purchase of new buses or buses that are less than five years old, to replace ageing vehicles before reaching their maximum age.³³ The funding contribution made by TMR under this scheme is either 50% or 100% of the cost of a new bus depending on the type of school bus service, subject to a cap of \$519,750 for heavy buses.³⁴
 - Anecdotally, most school buses which are replaced in Queensland receive funding from TMR under the School Bus Upgrade Scheme. In the 2023-24 financial year, this scheme provided a total of 168 grants to 165 operators, with a total value of \$12 million.³⁵ These ranged from minor assistance to more than \$700,000. In the 2024-25 financial year, over \$21 million was budgeted for the School Bus Upgrade Scheme.³⁶
- Additionally, TMR funds replacement buses as part of the Specialist School Transport program, to assist school bus operators to provide school transport for students with a disability. In the 2024-25 financial year, over \$2 million was budgeted to this program.

³³ Buses with 20–29 passenger seats are eligible for replacement funding when they reach 16 years of age. Buses with 30 or more passenger seats are eligible for replacement funding when they reach 20 years of age.

³⁴ This funding cap will be in place until the end of the 2025–26 financial year, at which time it will be reviewed. The funding cap is calculated differently for used buses, to account for depreciation. Whether an operator is eligible for 50% funding contribution or 100% depends on whether they operate a fares-based or capital-based kilometric school bus service. For more information, see the School Bus Upgrade Scheme information statements on TMR's website:

<https://www.tmr.qld.gov.au/travel-and-transport/school-transport/assistance-schemes/school-bus-upgrade-scheme/information-statements>

³⁵ Data on TMR's 2023-24 expenditure can be found at the Queensland Government Open Data Portal: <https://www.data.qld.gov.au/dataset/dtqr-queensland-government-investment-portal-gqip/resource/91397142-3972-44f4-b95d-a23b8d904b8b>

³⁶ Data on TMR's 2024-25 current funding can be found at the Queensland Government Open Data Portal: <https://www.data.qld.gov.au/dataset/dtqr-queensland-government-investment-portal-gqip/resource/a80ffd26-4948-4652-b542-885de9d6f557>

As well as the above, operators will still have the option to extend the life of heavy buses subject to investment in a thorough inspection and safety feature upgrade. Specifically, the transitioning requirement is that a bus that is within one year of reaching its maximum age limit may have its operational life extended for five years subject to a structural inspection and being upgraded to meet the Australian Design Rules that applied five years after the bus was first registered. The costs of a structural inspection begin around \$50,000, while the cost of safety upgrades will vary but can be more than \$30,000. While costly, such an inspection and upgrade is less than the cost of a new bus, and may be a preferable option for operators in specific circumstances, such as to fill a temporary gap in fleet requirements. As such, this option also mitigates the marginal cost to operators of retaining maximum vehicle age limits by providing some flexibility for cases where it is more cost-effective to safely extend the life of a bus rather than invest in a new bus replacement. The requirement also ensures safety outcomes are maintained, by ensuring that buses are not granted age extensions unless they are shown to be structurally sound, and are brought up to date with safety standards equivalent to buses that are below their maximum age limit.

Indicative Translink data from April 2025 suggests that only 101 heavy buses providing relevant services have currently had a structural inspection and only 52 have had a 5-year life inspection. These were mostly school buses. On this basis, TMR estimates there would be only 10 heavy buses per year that would reach the maximum age while still in service. Anecdotally, TMR understands the number of light vehicles providing relevant services reaching the maximum age would be negligible.

The table below is provided to indicate the current approximate costs of replacing a bus for different service types. It is important to note that due to the factors described above, the marginal cost to operators of prescribing maximum age limits is substantially lower than the approximate costs indicated below.

Model	Type of Service	Approximate cost new
78-seater (for example, Volvo B8RLE Volgren)	Urban	\$630,000 + GST
28-seater (for example Yutong)	Urban (regional)	\$167,000 + GST
21-seater (for example, Toyota Coaster)	School	\$124,000 + GST
24-seater (for example, Mitsubishi Rosa)	School	\$175,000 + GST
Heavy high floor school bus – 57 seats (various models)	School	\$510,000 + GST

Vehicle maximum age limits bring the cost of replacing a bus forward by mandating that an operator replace a vehicle before they otherwise would. Increased fuel and maintenance costs and decreased reliability make operating buses beyond 25 years increasingly uneconomic, and, in many cases, mandated age limits only bring this decision forward a few years. TMR analysis of the age and type of registered buses in Queensland found that heavy buses not subject to regulation under the PT standard are often disposed of soon after they are 25 years old. Around 50% are disposed of within 5 years and around 75% are disposed of within 10 years.

Older heavy buses used for passenger transport are also typically in the medium capacity range: around 20% have fewer than 40 seats, 65% have 40-60 and only 15% seat more than 60.

TMR estimates the net present value of the cost of replacing a heavy bus early to comply with the maximum age requirements to be less than \$170,000 per bus. This estimate is based on the following assumptions:

- In the absence of regulation, older buses are retired at a constant hazard rate which reflects 50% retirement every 5 years.
- Average bus replacement cost is \$466,000 (reflecting the observed distribution of older bus sizes and relevant indicative prices in the table above)

- 7% discount rate.³⁷

This figure does not include any of the benefits to an operator of replacing an older bus. Reduced fuel and maintenance costs would reduce this figure further and the benefits of higher reliability, comfort and service have not been quantified. As such, this is a significant overestimate of the net costs of compliance per vehicle.

Assuming there are 10 heavy school buses replaced per year at an average cost of less than \$170,000, the direct cost of compliance in the first year would be less than \$1.7 million in the first full year and less than \$12.8 million over 10 years.

Evidence and advice from consultants engaged by TMR regarding bus safety,³⁸ supports TMR's view that older buses are more likely to have defects due to age-related deterioration. A study of routine inspections in Victoria found that the risk of buses failing inspections due to defects increases by 8% with each year of vehicle age.³⁹ This means that every ten years, the risk of vehicle defects that result in inspection failure doubles. Older buses may also not have the latest safety features.

As discussed earlier in this paper, the potential impacts/costs of poor safety outcomes are significant, including costs associated with fatalities and serious injuries as well as loss of passenger confidence impacting patronage, leading to additional negative outcomes. In addition, older vehicles may not be as comfortable and lack accessibility features available in new models, again impacting patronage.

Due to the funding support described above, and the range of business drivers that may lead to buses being replaced prior to their maximum age limit regardless, the marginal cost to operators of requiring buses to be replaced before reaching maximum age limits will be low. On balance, the benefits to safety outcomes of this requirement are considered to outweigh the costs of bus replacement.

- Structural inspections of heavy buses

Operators must obtain structural inspections of heavy buses that are 20 years old or entering service at 21 years or older. In addition, as mentioned, operators who do not wish to retire and replace a bus which reaches its maximum age may undergo structural inspections and upgrades to extend the operational life of the bus by five years.

Impacts: These inspections may be costly because they may involve removal of exterior panels and some internal fittings to examine the structure or frame of the vehicle. Alternative inspection techniques can be adopted to cater to different bus designs, for example buses fitted with stretch panels, which may reduce costs for some models compared to full panel removal.

TMR information shows the cost of these inspections may start from approximately \$50,000 for the frame inspection, including the removal and reattachment of panels and fittings to allow for this inspection. This figure does not include the cost of any repairs that the inspection may identify are required.

As mentioned above, indicative Translink data from April 2025 suggests that only 101 heavy buses providing relevant services have currently had a structural inspection, while 52 have had a 5-year life inspection which would suggest they are operating or intend to operate beyond 25 years. Assuming there are 15 buses per year that require an inspection, the direct cost would be \$0.750 million in the first full year or \$5.636 million over the first 10 years.

The safety management framework means that operators should have systems in place to monitor the safety of vehicles. This could imply the need for a structural inspection which would reduce the marginal cost for operators of meeting the specific obligation for an age-related inspection. Including a specific requirement ensures both clarity for operators about this minimum expectation and a trigger for TMR to issue a direction to the operator if this requirement is not met.

³⁷ That is, the present value of the cost of replacing a bus decreases by 7% each year the replacement can be delayed. For example, the cost of a \$466,000 bus replaced one year early is valued at \$30,486; one replaced ten years early is valued at \$229,109.

³⁸ For more discussion of this consultancy advice, see the heading, "Who was consulted?".

³⁹ Qiu, J. (2020). *Bus companies and roadworthiness: an in-depth analysis of the factors influencing inspection and incident outcomes* [Doctoral dissertation, Monash University]. Monash Bridges. <https://doi.org/10.26180/5f50522d81050>. Specifically, Qiu (2020, p.113) finds that the risk of a bus failing routine inspections due to defects rises by 8% with each year of age.

Structural integrity is critical to ensuring the vehicle is as safe as possible in the event of a crash, and structural defects may not be apparent through the annual inspection undertaken to ensure a "certificate of inspection" required under the VSS Regulation, as this does not investigate the condition of the vehicle under the panels. Advice from consultants engaged by TMR recognised that the annual "certificate of inspection" alone is insufficient to ensure safety, and a more comprehensive inspection is required. As a result, there is a potential impact on safety if structural inspections are not undertaken. The potential impacts and costs of poor safety outcomes may be significant as discussed earlier in this paper.

It should be noted that in providing advice to TMR, the consultants recommended that the maximum age limit for both light and heavy vehicles be discontinued, but only if an alternative inspection regime is applied to both light and heavy buses that is more comprehensive than that imposed by the current "certificate of inspection" requirements. This recommendation would require extensive changes to the vehicle inspection regime, including what is inspected and how, inspection intervals, and who should do those inspections. It would also potentially impact current certification and inspection arrangements involving Approved Persons and Approved Examiners under the *Transport Operations (Road Use Management – Accreditation and Other Provisions) Regulation 2015* (persons external to TMR who are accredited to undertake bus inspections), and authorised officers. Further consideration of this issue would require considerable consultation about potential impacts, and it was not possible for TMR to complete this work within the timeframes for the expiry of the PT Standard.

Additional and consequential amendments relating to the expiry of the PT Standard

There would also be consequential amendments, to support the transition of all the matters identified for transition above, including:

- Ensuring manual operation of warning lights on buses carrying children under section 222A of the *Transport Operations (Road Use Management—Road Rules) Regulation 2009* (Queensland Road Rules) is optional where the lights automatically operate when the doors are open.

Impacts: This amendment complements the warning lights and signs amendment mentioned above and recognises that modern buses may not have a switch to support manual activation because in many modern buses the lights automatically operate when the doors are open. The amendment will benefit operators by removing the requirement for vehicles to be modified to include a switch to support manual operation. However, operators may still install manual switches if they choose, and drivers will still be able to operate the lights manually if they have a switch.

- Ensuring refusal, amendment, suspension and cancellation (subject to procedural fairness via a "show cause" notice) against an operator's accreditation or driver's authorisation continues to be available if there is non-compliance.

Impacts: This approach is consistent with current arrangements for the PT Standard in that failure to comply with the PT Standard is grounds for commencing action to amend, suspend or cancel, an operator's accreditation or driver's authorisation. Past non-compliance is also grounds for refusing an application for operator accreditation or driver authorisation. As the transitioning matters would be grounded in safety, it is important for TMR to be able to act against a person's authorisation as appropriate. The potential impacts/costs of poor safety outcomes are significant as discussed earlier in this paper.

- For consistency with similar provisions that apply to personalised transport (taxi and booked hire services):
 - introducing offences for operators who fail to comply with driver training requirements. The maximum penalty will be 40 penalty units for failing to comply with the training requirements and 20 penalty units for failing to comply with record management requirements. This penalty is consistent with existing section 97(3) of the PT Regulation.
 - introducing offences for operators who fail to have and comply with and keep records under a document maintenance program. The maximum penalty will be 20 penalty units. This is consistent with section 224 of the PT Regulation.
 - extending requirements (including offences) for fatigue records so, in addition to applying to personalised transport services, other operators of road-based passenger services will be required to keep appropriate records relating to fatigue. These requirements include details of the driver, their authorisation number and when the driver is either driving or available to drive. In addition, there is a requirement to produce the records. The maximum penalties will be 80 penalty units which is consistent with the offences in section 101-103 of the PT Regulation.

Impacts: The slight variations to the current fatigue record keeping and reporting requirements will ensure consistency across road-based passenger services. In practice these requirements reflect sound business practices and should have no or minimal marginal impact on operators. However, clear prescription not only provides clarity for operators, but also ensures TMR has an efficient way to address non-compliance.

- Prescription of offences as infringement notice offences in the *State Penalties Enforcement Regulation 2014*.

Impacts: Allowing infringement notices to be issued for offences provides an efficient option for addressing non-compliance. This benefits TMR and the courts system, but also the person by avoiding the costs associated with time and possible legal representation if the matter proceeds to court.

- Incidental transitional and consequential amendments (to ensure continuity for operators and drivers and update section references) and other minor adjustments are also included but are administrative in nature and will have no adverse impact.

Analytical Limitations

Impacts are discussed qualitatively and quantitatively to the extent possible above, however it is not possible to quantify how various options for regulation of those matters currently addressed in the PT Standard would impact the likelihood of crashes, fatalities or serious injuries and hence the cost.

- There is no or limited data and research relevant to assessing the contribution that each of the matters makes to safety outcomes.
- There are also a range of other factors that will affect the safety outcomes, including, most significantly, the unknown extent to which the safety management framework, commencing at the same time as the amendment regulation, will improve management of safety, particularly in the early stages of its adoption by the bus industry. It is in the context of the safety management framework that reduced prescription due to the expiry of the PT Standard may lead to innovations that improve safety outcomes or reduce costs but may reduce clarity about appropriate management of some safety risks.

Who was consulted?

In October 2023, TMR released a comprehensive discussion paper *Review of the Transport Operations (Passenger Transport) Standard 2010* (the discussion paper) along with a survey for completion.

TMR advised more than 50,000 people, including key industry stakeholders such as operators and drivers, of the opportunity to comment on the review of the PT Standard via email or completing an online survey available through the Queensland Government's *Get Involved* website.

In total, TMR received 44 responses to the online survey questions and 33 written submissions. Three of the written submissions were from industry groups – Queensland Bus Industry Council (QBIC), Queensland School Bus Alliance (QSBA) and a joint submission from several Queensland bus operators. Of the remaining submissions, seven were from government agencies. The remainder were individuals some of whom appeared to be personalised transport drivers, bus drivers and operators.

The discussion paper outlined a proposed approach to the future management of most of the matters in the PT Standard, including to expire provisions or transition them to the PT Regulation. For some matters, TMR proposed the options of either expiring or transitioning to seek a preferred position from stakeholders. Stakeholders could also submit "don't know" to any of the matters raised for response. Of the 33 matters addressed in the discussion paper:

- o TMR indicated its preferred position on 27, and
- o stakeholder views were invited on whether 6 should be transitioned or expired.

The TMR proposals received general support from stakeholders. Of the 27⁴⁰ proposals:

- o 14 were supported by an absolute majority, i.e. more than 50 per cent of total respondents.
- o 14 were supported by more respondents than were opposed. However, these did not have an absolute majority, mainly due to the larger proportion of "don't know" responses.

The "don't know" response rate ranged from 9 per cent to 30 per cent of total respondents, depending on the issue. It is difficult to draw firm conclusions from these responses. However, the generally supportive response to proposals and low response rate overall tends to indicate that most stakeholders did not view the proposals as controversial. None of the proposals were opposed by the majority of respondents.

Stakeholder feedback was mixed on the remaining 6 matters, with a high proportion of "don't know" responses.⁴¹ Support for expiring the provisions ranged from 34 to 48 per cent, while support for transitioning the provisions ranged from 36 to 43 per cent of total respondents, depending on the question.

Some topics raised issues requiring further consideration. These issues, and TMR's response, were as follows:

- o The discussion paper proposed to transition the 3 for 2 seating rules, with a minor amendment so it applied to children under 12 rather than pre-school and primary school children.

Drivers noted a child's age is less obvious to a driver than using a child's uniform to identify if they are a primary or secondary school student. TMR adjusted the proposal to ensure it can be applied in a practical way by specifying that drivers "reasonably consider" that the child is under 12. No further issue was raised in subsequent consultation.

- o The discussion paper proposed transitioning training requirements for drivers with minor amendment. The requirement that the driver receive introductory driver training before operating the vehicle, and comprehensive training within the following 2 months, would be replaced with a single requirement to complete training before operating the vehicle.

Operators were concerned that removing the 2-month period for completing the full training would impact their ability to fill vacancies quickly. In response, TMR is intending to continue introductory training. No further issue was raised in subsequent consultation.

- o The discussion paper proposed to transition requirements for warning signs and lights on school buses with amendments to adopt nationally consistent vehicle standards and reduce duplication.

⁴⁰ One of these proposals raised multiple sub-questions about standing passengers for certain services. Because stakeholder feedback on these questions differed, this is included twice under both the first and second dot point. 75 per cent of respondents supported retaining a prohibition on carrying standing passengers on a bus unless it is specifically designed to carry standing passengers. 47 per cent supported expiring provisions prohibiting standing passengers in long distance scheduled passenger services and tourist services.

⁴¹ Between 18% and 30% of total respondents, depending on the question.

Respondents were supportive and highlighted the need to accommodate for short term replacement buses that may not have nationally consistent lights and signs fitted. Concerns were also raised about inconsistencies between these requirements and section 222A (Use of warning lights—picking up or setting down school children) of the Queensland Road Rules.

In response, TMR is working with the National Heavy Vehicle Regulator to ensure there is an exemption for temporary replacement vehicles. Section 222A of the Queensland Road Rules will also be amended to ensure it is optional for drivers of vehicles with automatic warning lights to also manually operate their warning lights before stopping the bus to set down or pick up children. Automatic warning lights automatically operate when the bus doors are open for children to enter or leave the bus.

- The discussion paper proposed to expire vehicle type/design provisions, including padding requirements, on the basis that they would be covered by the safety duty.

Following industry feedback, and ongoing community concern about passenger safety, TMR now proposes to transition these provisions.

- Feedback was divided about whether to remove maximum age limits, structural inspections and structural repair requirements for buses.

Some respondents, including QBIC, were concerned that removing prescriptive requirements will lead to reduced clarity about expectations for operators regarding safety obligations.

In addition, QBIC raised concerns that removing the maximum age limit may allow older buses to re-enter service, and changing building materials could mean 'galvanic corrosion' arises in new vehicles where inspections and life cycle checks are needed. QBIC also queried the impact on the role of the state under contracted services.

Other respondents, including the QSBA and a joint submission from 19 operators, recommended allowing maximum age limits and structural inspections to expire, preferring to be able to manage these matters more flexibly under the safety management framework. Submissions noted:

- The current requirements arose from a historical position where there was less government funding, and the Australian Design Rules have also since advanced. Since 1988, increased government funding, e.g. through the Translink Bus Replacement Program, incentivises operators to maintain a modern fleet and so the maximum age limits are no longer required.
- Transitioning the vehicle age requirements would deter operators from investing in more expensive buses with greater durability and improved safety features.
- There are concerns about obtaining replacement buses between 2025 and 2030 due to reduced manufacturing in Australia.
- During COVID restrictions between 2020–22, many buses were dormant for a prolonged period. These may be decommissioned without the full use of the vehicle's operational life, based solely on the vehicle's age.
- New South Wales and Victoria do not have maximum age limits. Instead, buses must undertake scheduled inspections.
- Structural inspections should be undertaken 'as and when required' based on differences in body construction materials, vehicle maintenance regimes, and operating conditions, rather than because the vehicle has reached 20 years of age.
- Structural inspections are expensive. Given the 20-year requirement applies even if the vehicle has been prior repaired or refurbished, this may impact commercial decisions.

In response to stakeholder feedback, TMR notes the current requirements for age of vehicles and structural inspections do not limit structural inspections to 20 years. They require operators to have the vehicle inspected if there are signs of substantial rust, regardless of age.⁴² As a result, transitioning the current requirements will not limit an operator's obligations to monitor and maintain the safety of the vehicle outside of the nominated inspection intervals.

⁴² Schedule 1, section 30(7) of the PT Standard.

However, the 20-year inspection, and/or inspection if there is a service life extension, allow monitoring of vehicle condition by TMR. In addition, the current requirements also recognise that a structural inspection undertaken when the bus was 19 years old and before it has travelled 50,000km would negate the need for a 20-year structural inspection.⁴³

Noting the highly technical nature of these issues and the divided stakeholder opinions, TMR engaged a specialist automotive engineering contractor to give advice about the vehicle age, structural inspection and structural repair requirements. The consultants were asked specifically to comment on the two options presented in the discussion paper – to allow the requirements to expire and be managed under the proposed safety duty, or to transition these requirements from the PT Standard to the PT Regulation.

The final report was provided to TMR in June 2024. It recommended adopting Option 1 (allow the requirements to expire) but only if new requirements for comprehensive inspection were introduced to support vehicles being retired based on their condition, and some other elements were largely retained as requirements for a safety management plan. The final report explicitly recommended against the removal of maximum age limits without the introduction of new inspection requirements.

In summary, the consultant's recommendation differed from both options proposed because it was to:

- Replace limits on the maximum age of vehicles, with condition-based retirement planning based on comprehensive roadworthiness inspections triggered by the age of the vehicle and any observed signs of defects,
- largely retain the requirements for refurbishment to update safety features, to ensure older vehicles that remain in service do not fall too far behind modern safety standards, and
- largely retain, with some modifications, the structural repair requirements.

The consultants were of the view that annual roadworthiness ("certificate of inspection") inspections were useful for general monitoring of vehicle condition, but more comprehensive inspections were also needed at intervals to identify less obvious safety issues. The comprehensive inspection framework proposed would incorporate elements of the existing structural and service life extension inspections for heavy buses with some additions and modifications, and new inspection techniques would need to be developed for light buses.

This recommendation would require extensive changes to the vehicle inspection regime, including what is inspected and how, inspection intervals, and who should do those inspections. It would also potentially impact current inspection arrangements involving Approved Persons (who are external persons accredited to undertake bus inspections) and authorised officers. Due to the potential impacts on a broad range of stakeholders and the significant safety risks, further consideration of this issue would require considerable consultation with those potentially impacted. It was not possible for TMR to complete this work within the timeframes for the expiry of the PT Standard.

When it became apparent that TMR could not adopt the consultant's recommendation, TMR also considered an interim approach where:

- light bus maximum age limits would expire, with vehicle condition being managed through annual certificate of inspection processes. However, the consultants advised that the light bus age limits should not be removed without additional comprehensive inspections in place.
- maximum age limit for heavy vehicles would be expired but the current structural and 5-year service life extension inspections would continue at intervals consistent with the consultant's recommendations. However, it became apparent this could inadvertently lead to an increased number of 5-year service life extension inspections before the bus is 30 years old, and so would potentially mean operators would be worse off in terms of inspection obligations and related costs.

Given this feedback and the risks of allowing the existing requirements to expire, TMR put forward the proposal to transition the existing requirements into the PT Standard without amendment.

In August 2024, TMR engaged with targeted groups of stakeholders, including QBIC and QSBA, about the revised proposals. Written information was provided for other respondents.

⁴³ Schedule 1, section 30(4) of the PT Standard.

This further engagement did not lead to any new issues being raised and did not change the stakeholder's support for, or opposition to, the proposals. However, this engagement highlighted that some stakeholders who supported removal of maximum age limits and structural inspections for heavy buses were of the view that annual certificate of inspection inspections would be sufficient to monitor vehicle condition. There was also comment about a preference to remove the requirements around structural repairs. These views were not consistent with the advice from the automotive engineering experts in the final report.

There was also feedback from stakeholders about a range of issues that were outside the scope of the PT Standard review. This included feedback about the safety management framework proposed by the Transport and Other Legislation Amendment Bill 2024 which was before the Queensland Parliament at the time but is beyond the scope of this IAS. Other feedback included petitioning for seatbelts in all buses, issues related to driver wages, and difficulties driving with school children.

In June 2025, TMR consulted QBIC and some members of QSBA on a confidential working draft of the proposed legislation. Feedback identified minor improvements that were incorporated in subsequent drafts. They also raised some concerns about the framework which were outside the scope of this IAS, and about transitioning requirements on which consensus was lacking, including structural inspections and the maximum age of vehicles.

In September 2025, in response to QSBA concern about the cost of structural inspections, TMR consulted QBIC and QSBA on the potential to streamline requirements for structural inspection. The proposed legislation includes a minor clarification about the method of frame inspections for vehicle life extensions which was the only change on which there was consensus.

Separately, a specific discussion paper was distributed to key stakeholders to obtain their views on the proposal to amend the Queensland Road Rules as they relate to warning signs and lights on school buses. Stakeholders consulted included QBIC, the QSBA, the Queensland Police Service (QPS), Transport for Brisbane, and the Royal Automobile Club of Queensland (RACQ). Most responses from stakeholders voiced strong support for the change, citing national consistency, operational efficiency, removal of potential for penalisation, and addressing industry concerns as their reasons for support of this proposal. The QSBA response highlighted that the timed element of manual driver activation is not of concern. However, the QSBA raised several concerns with the discussion paper, particularly noting that the focus of the discussion paper did not consider rural and/or regional Queensland perspectives. The road conditions and driving behaviours in these areas can vary more significantly than urban environments, creating the potential for more dangerous scenarios. For this reason, the QSBA advocated to retain optional manual activation of warning lights in dangerous situations. TMR considers that the specific risks identified by an operator in a rural and/or regional area can be appropriately mitigated in the safety management plan, including by implementing policies for the manual activation of warning lights where appropriate.

What is the recommended option and why?

It is recommended that ***Option 3 – Transition some, but not all, matters from the PT Standard into regulations to maintain safety outcomes*** be progressed.

This option is considered to deliver the highest net benefit. It does this by appropriately balancing reduced regulatory burden on industry with safety because:

- As much as possible, prescriptive regulatory requirements will be allowed to expire. This supports the realisation of the benefits of the new safety framework introduced by TOLAA by allowing industry members to take a more flexible, individualised, risk-based approach to their business, and potentially reducing costs.
- Where there is a cost impact for operators, the marginal impact is generally low, particularly in the context of operators concurrently having to comply with the safety management framework. The highest potential cost is for replacing vehicles, but depreciation and ongoing maintenance of older vehicles often favours replacement and reduces the marginal cost to operators. Also, operators of heavy buses have the option of choosing to do a service life extension to extend the life of the bus.
- Even where the cost to business is significant before these other factors are considered, such as in replacing vehicles and structural inspections, it is justified when assessed against the costs of even one additional serious bus crash as discussed below.

- As the safety management framework lacks specificity there is a benefit to operators and the community via improved safety outcomes in providing clarity regarding minimum safety expectations in relation to some risks, particularly in the early stages of the adoption of the safety management framework. This is supported by feedback from stakeholders during consultation about the transitioning matters, but also during consultation about the safety management framework.
- Specific requirements will often allow TMR to take more efficient targeted action on those matters if needed.
- As the matters transitioning from the PT Standard have generally been longstanding policy in Queensland, often pre-dating the PT Standard, they do not raise any new or additional costs or impacts for operators or drivers above their current arrangements and have formed the basis for business practices and decisions to date.
- Specifically in relation to maximum age limits and structural inspections, the consultant firmly recommended that maximum age limits should only be removed if a more comprehensive inspection program was in place. They were clear that the annual 'certificate of inspection' inspections would not suffice. Transitioning the current approach to age limits and structural inspections ensures buses providing passenger transport services are structurally sound and, in the interests of safety, the fleet is kept relatively modern. Advice from the consultant noted age-related deterioration means that older vehicles are likely to have more defects and will not have the benefits from advancements (for example, modern safety features such as occupant protection, crash avoidance technologies, improved comfort features, reduced emissions and improved accessibility features). Further, the current approach also provides a reasonably efficient way for government to monitor vehicle condition across the industry where key events such as structural inspection and retirement from service are determined based on age as a metric. Applying the age metric also provides a reasonably efficient metric for operators to use to base business decisions (although it is noted that operating conditions and environment will also impact a bus's life). Initial scoping of further work on this option identified the potential for significant impacts on the vehicle inspection industry (including Approved Examiners and Approved Inspection Stations who are external to TMR). With the complexity of the issues and need for further consultation, it was not possible for TMR to complete this work within the timeframes for the expiry of the PT Standard.

It is not possible to estimate the likely change in crashes, fatalities or serious injuries if the matters currently regulated through the PT Standard were no longer regulated, as various external factors also influence safety outcomes. For example, while the PT Standard has been in place, there have been advances in vehicle safety technology across all vehicle types. There is no or limited data and research relevant to assessing the contribution that each of the matters makes to safety outcomes.

It is also hard to estimate the likely impact of the options because it is unknown how much and how quickly the safety management framework, commencing at the same time as the amendment regulation, will improve management of safety. In the context of the transition to the new safety management framework, reduced prescription due to the expiry of the PT Standard may lead to innovations that improve safety outcomes or reduce costs, but may reduce clarity about appropriate management of some safety risks particularly in the early stages.

Due to the new safety framework, transitioning the identified provisions (Option 3) would generally have low marginal cost impacts when compared to if all prescriptive regulation was discontinued because the amendments were not made (Option 1).

Despite difficulties estimating costs that may be incurred due to the amendments comprising Option 3, an attempt has been made to do so where they may be significant. The total cost is broadly estimated to be \$3.3 million in the first full year, comprising cost estimates discussed earlier in this document of \$1.7 million for bus replacement due to maximum vehicle age requirements, \$0.750 million for structural inspections, \$0.184 million for training requirements for operators, and \$0.643 million for training requirements for drivers.

The transitioning provisions are focused on retaining clarity in some specific safety issues. Noting the number of trips undertaken by buses, and the capacity for buses to carry large numbers of people including standing passengers, reduced safety standards due to a lack of clarity could potentially lead to increased

fatalities and hospitalisations. A 2022 report discussed earlier in this document⁴⁴ considered the social cost of road crashes, including direct costs to victims, indirect costs such as productivity losses, and the impact of pain, grief and suffering on relatives, friends, and society generally. Based on this report, the social cost, escalated to 2024 dollars, is \$3.46 million per road fatality and \$287,861 per hospitalised injury. In addition, there may be a negative impact on public transport service patronage.

In quantitative terms, the recommended option would need to deliver a relatively small impact on safety to be cost neutral. Implementing Option 3 at an estimated cost of \$3.3 million in the first full year would provide a net benefit to society if it prevented the social costs associated with even one fatality in a year. Alternatively, there would be a net benefit to society if it prevented 12 hospitalisations in a year. It is considered very likely that implementing Option 3 would achieve this level of reduction given TMR's road safety data discussed earlier in this document shows that over a ten-year period there were 34 fatalities and 1,127 hospitalisations due to crashes involving buses, of which 468 of the casualties were a bus occupant (driver or passenger).

Overall, the benefits of ensuring current safety standards are maintained, by providing clarity under Option 3, outweigh any perceived benefits to industry of removing the prescriptive requirements that are proposed to transition.

⁴⁴ Steinhauser, R., Lancsar, E., Bourke, S., Munira, L., Breunig, R., Gruen, R., Dobes, L., Bulfone, L., Glass, K., Gordon, C., & Cox, J. (2022). Social Cost of Road Crashes. The Australian National University. <https://www.bitre.gov.au/sites/default/files/documents/social-cost-of-road-crashes.pdf>

Impact assessment

	First full year	First 10 years
Direct costs – Compliance costs	<p>TOTAL ESTIMATED DIRECT COSTS = \$3.3 million, comprising:</p> <ul style="list-style-type: none"> ○ \$1.7 million bus replacement for maximum vehicle age requirements ○ \$0.750 million for structural inspections ○ \$0.184 million for training requirements for operators ○ \$0.643 million for training requirements for drivers. <p>Other compliance costs for industry are not significant, difficult to quantify, and typically operator-specific.</p> <p>Any costs to operators need to be balanced against the significant costs to the community that would arise if no regulation led to reduced safety outcomes (as discussed in more detail above).</p>	<p>TOTAL ESTIMATED DIRECT COSTS = \$24.7 million, comprising:</p> <ul style="list-style-type: none"> ○ \$12.8 million bus replacement for maximum vehicle age requirements ○ \$5.636 million for structural inspections ○ \$1.381 million for training requirements for operators ○ \$4.833 million for training requirements for drivers. <p>Other compliance costs for industry are not significant, difficult to quantify, and typically operator-specific.</p> <p>Any costs to operators need to be balanced against the costs to the community that would arise if no regulation led to reduced safety outcomes (as discussed in more detail above).</p>
Direct costs – Government costs	Not significant.	Not significant.

Part 2: Administrative requirements for Safety Management Plans and audits

What is the nature, size, and scope of the problem? What are the objectives of government action?

The impact of the new Safety Management Plan requirements and auditing framework was addressed in the IAS for the Transport and Other Legislation Amendment Bill 2023. The relevant amendments in that Bill, which received assent to become the TOLAA, provide for certain details about safety management plans and audits to be prescribed by regulation. This IAS only considers the marginal impact of prescribing such details.

Size and scope of the services and entities regulated

Road-based public passenger services will be subject to safety duties under the new safety management framework established when relevant provisions of TOLAA commence.

The regulated services can be broadly segmented as follows:

- Public passenger services other than personalised transport services and exempt services. An operator accreditation must be held to operate these services. They are currently regulated by the PT Standard, and the size and scope of these services are discussed in Part 1. Notably, on 1 June 2025, there were 1,209 holders of an operator accreditation.
- Personalised transport services, comprising taxi services, booked hire services, and booking services. Booking services must hold a booking entity authorisation (BEA) to deliver those services. On 30 June 2025 there were:
 - 637 (BEA holders,
 - 21,690 booked hire service licences, and
 - 3,247 taxi and 480 limousine service licences.
- Exempt services (where operators are exempt from holding an Operator Accreditation) typically provide a community transport service or courtesy transport. Exempt services must currently provide a vehicle in a safe condition.⁴⁵ Under the new safety management framework being established by TOLAA, exempt services will have safety duties, be required to develop safety management plans, and may be audited, unless they are provided by a volunteer association.⁴⁶ Exempt community transport services may include government-funded transport for vulnerable community members. Courtesy services which may be exempt are typically operated by schools, day care and kindergarten providers, community organisations, clubs, and businesses such as accommodation services, vehicle mechanics and other small businesses, providing a transport service for their clients using two or less vehicles. Some indication of the potential size of this segment is available from data on some of the types of organisations that may operate them. For example, there are:
 - 1,798 schools (1,146 primary schools, 276 secondary schools, 281 combined primary/secondary schools and 95 special schools);⁴⁷
 - Over 1,290 community clubs, such as sporting clubs, RSL, and ex-services/memorial clubs, surf lifesaving clubs, workers, business, cultural, and general community clubs;⁴⁸ and

⁴⁵ PT Regulation, section 223. They are beyond the scope of the general safety obligation for holders of an operator accreditation in PT Standard, section 22 and the safety duties for personalised transport services in the PT Act, Chapter 7, Part 3.

⁴⁶ TOLAA, Section 45 (Amendment of schedule 3 (Dictionary), definition of 'road-based public passenger service').

⁴⁷ Queensland Government Statistician's Office. (2025). *Schools Queensland, 2024*. <https://www.qgso.qld.gov.au/issues/3646/schools-qld-2024.pdf>

⁴⁸ Clubs Queensland. (n.d.). *About*. <https://clubsqld.com.au/Web/Web/About/About.aspx>

- o 1,827 childcare centres.

However, the proportion of these entities that operate an exempt service is unknown.

Responsible duty holders must complete a safety management plan. The total number of *responsible duty holders* who must have a safety management plan comprises approximately 1,209 operator accreditation holders (as at 1 June 2025) and 637 authorised booking entities (as at 30 June 2025) and an unknown number of exempt operators (possibly in the thousands, but not including services run by volunteer associations) and an unknown (but small) number of operators of a taxi or limousine service who do not require authorisation because they do not provide a booking service.

While any duty holder can be audited under the new framework, in practice audits would likely also focus on *responsible duty holders*. However, the total number of entities potentially impacted by the audit framework is much greater and extends to registered operators of vehicles, drivers, and others who are duty holders. For example, as at 1 June 2025, there were 57,161 holders of driver authorisations. The total number of unique entities is not known due to the overlapping of roles that have a duty in some services.

Requirements for safety management plans

Nature of the problem

The new requirements introduced by TOLAA include that a safety management plan must:

- identify and describe hazards,
- assess safety risks,
- outline actions to eliminate or minimise those risks, and
- identify responsible persons for taking those actions.⁴⁹

A safety management plan must also comply with any requirements prescribed by regulation.⁵⁰

Responsible duty holders may already have developed - safety management plans in some form to help them manage their safety risks under work health and safety laws, the HVNL (for larger vehicles) or the current TOPTA provisions (for personalised transport). Under work health and safety laws, all operators must comply with a code of practice which covers identifying hazards, assessing risks, controlling risks, reviewing controls, and keeping records. Guidance provided by the National Heavy Vehicle Regulator promotes the use of a safety management system to support compliance with the safety duty under the HVNL. A safety management system is also encouraged to help personalised transport providers comply with their requirements in the chain of responsibility under TOPTA. The new requirements under the TOLAA are intended to harmonise with plans/systems developed under the existing guidance from these sources. However, there is likely to be varying levels of adoption and sophistication of the safety management plans/system across the industry.

The nature of the operators impacted may range from large corporations providing booked hire services, to smaller family run businesses providing services in their local community. These different providers will have different levels of sophistication regarding preparation of safety management plans and maintaining them over time. To ensure safety management plans remain relevant and can be audited effectively, it is important for all operators and booking service providers to have consistent basic requirements, such as that safety management plans must be in writing and updated after a new hazard is identified.

Objective

The objectives of this proposal are to **improve** industry compliance with their obligations by providing an appropriate level of guidance for industry about the content, form, consultation and review of safety management plans.

Audit notices and audit reports

Nature of the problem

⁴⁹ Section 67ZB(1) of the PT Act

⁵⁰ Section 67ZB(2) of the PT Act

As part of the streamlined auditing framework, TOLAA repealed the existing provisions that applied only to taxi services and booked hire services, and replaced them with an auditing framework that applies to all duty holders for a road-based public passenger service.

TOLAA also created heads of power for prescribing:

- additional information that must be stated on an audit notice,⁵¹ and
- information that must be included in an audit report.⁵²

Objective

The objective of this proposal is to **clarify** the audit framework for all duty holders. The amendments will place an obligation on authorised persons and the chief executive regarding information in audit notices and reports, but do not place an obligation on those being audited.

What options were considered?

Requirements for new safety management plans

Option 1 – maintain status quo and do not prescribe requirements in the PT Regulation

This option would rely solely on the provisions in the PT Act to regulate the form, content and review of safety management plans prepared by operators and booking service providers. The safety management plans could be in any form provided they covered the minimum criteria in section 67ZB, such as identifying hazards, risk assessment, actions to be taken, identifying who would take that risk; and there would be no clear minimum review or record keeping requirements. Government would rely solely on non-legislative guidance material to support industry compliance.

Option 2 – introduce a highly prescriptive model for safety management plans

This option would involve a heavily prescriptive regulatory approach to safety management plan requirements in the PT Regulation. For example, requirements could detail specific hazards that must be included in each safety management plan and what actions must be included in each plan to respond to that hazard. Government may or may not also provide non-legislative guidance material to support industry compliance.

Option 3 – introduce a 'light touch' regulation model

This option would amend the PT Regulation to prescribe only minimum safety management plan requirements, such as requirements:

- for the safety management plan to be in writing; state a start date; be accessible to duty holders, the chief executive and authorised persons; and be developed and reviewed in consultation with duty holders,
- to ensure the safety management plan is reviewed at least every three years, but it is also reviewed if there is a material change to the service, an incident is reported or a new hazard is identified, or if it is identified that an existing hazard is not adequately mitigated in the plan, and
- to keep records about superseded safety management plans.

The PT Regulation would also be amended to provide clarity about effective consultation with other duty holders who may be impacted by the plan. Similar to work health and safety requirements, consultation about the safety management plan must occur at the creation and review of the plan, so far as reasonably practicable. Government would provide non-legislative guidance material to support industry compliance.

Audit notices and audit reports

Option 1 – maintain status quo and do not prescribe requirements in the PT Regulation

⁵¹ Section 67ZE(2)(d) of the PT Act

⁵² Section 67ZG(2)(d) of the PT Act

This option would rely solely on the provisions in the PT Act to regulate the form and content of audit notices and audit reports.

Option 2 – prescribe requirements in the PT Regulation

This option would further clarify the requirements by prescribing additional information that must be included in audit notices and audit reports.

What are the impacts?

Requirements for safety management plans

Option 1 would provide industry with no additional guidance than is currently contained in the TOLAA amendments regarding the content, form, start date, consultation requirements, accessibility, review and record keeping requirements for safety management plans. This would have the impact of providing industry members with maximum flexibility to produce a plan that meets their needs. However, this may also mean industry is guided less effectively in the completion or review of safety management plans. This option would also potentially result in safety management plans that TMR cannot audit effectively, for example, because a plan is not in writing, or that are not responsive to changing needs, for example, because a plan is not updated after a new hazard is identified.

As there is no variation between this option and the TOLAA requirement for a safety management plan, the cost and resourcing impacts would not be above those outlined in the IAS for the Act amendments to introduce the safety management plan requirement (noting likely variability in costs depending on the level of sophistication of the responsible duty holder and the nature and complexity of their business).

Option 2 would attempt to prescribe the required content for safety management plans in high levels of detail. This may make it difficult for each service provider to build a safety management plan that is tailored to their circumstances. For example, the regulation could prescribe specific hazards that need to be included in a safety management plan and/or specific actions that may be required of duty holders. As a practical example, the legislation could prescribe that all safety management plans must include daily drug and alcohol testing for drivers, however, this would be impracticable for a one-person owner/driver operation. Option 2 would provide clear guidance to industry about the matters that must be included in the safety management plan to be compliant under the legislation, and would provide TMR with the most easily enforceable model. However, it may undermine the new safety duty framework requiring operators to take measures to proactively identify and mitigate (to the extent reasonably practicable) the safety risks associated with hazards relating to their service, and hence may fail to ensure current and emerging issues are adequately managed.

Option 3 would provide some high-level guidance as to the necessary content for safety management plans and also ensure some minimum requirements for safety management plans are clearly prescribed, including the form of the safety management plan, minimum requirements for consultation with other duty holders, record keeping requirements, and other administrative requirements. This approach would enable industry to manage their safety management plan including identifying the hazards and risks in a holistic manner that is most suitable for their business operations, and scaled to the size and complexity of their business operations and service delivery model.

Safety management plans (or variations of them) are already required under the HVNL (operators of heavy vehicles must maintain a safety management system (SMS)), and there is an implied obligation for safety management plans for personalised transport operators under the PT Act. The safety management plan requirements in TOLAA were drafted to be consistent with other frameworks to minimise the regulatory burden and the risk of duplication on industry. Compliance costs stemming from obligations related to safety management plans were discussed in the IAS for the Transport and Other Legislation Amendment Bill 2023.

A similarly consistent approach is proposed under Option 3. For example, consultation requirements are like those required under work health and safety laws, and the requirements for record keeping are also consistent with existing requirements under the PT Regulation. This would minimise industry confusion and therefore the overall impact on industry.

Option 3 would include a requirement for responsible duty holders to review safety management plans at specific intervals and in response to certain triggers. Specifically:

- 'Comprehensive reviews' of safety management plans are required at least every three years.

- In addition, if there is a material change to the service, or there has been an incident, or a responsible duty holder identifies a new hazard or discovers that their safety management plan does not adequately deal with a known hazard, they will need to review their safety management plan to see if it should be updated. These reviews are intended to be less onerous and costly on responsible duty holders than a comprehensive review. Requiring operators to review their safety management plan after a material change, incident, or a new hazard has been identified (whether it is the result of an event, or whether it is in the process of planning for new aspects of the service) supports continuous improvement in safety management practices. It also ensures the operator can produce this information during audits or other investigations.

The cost of reviewing a safety management plan is not expected to be as onerous as the cost to develop a new safety management plan. It is also likely to vary depending on the trigger for the review, as well as the scale of the plan under review.

It should be noted that any costs and resourcing to ensure safety management plans meet the obligations imposed through this regulation will be minimal marginal costs. This is because they are activities that would ordinarily be done as good business practice during the development and maintenance of a safety management plan (as required under the Act provisions introduced by TOLAA) or to align with existing activities such as consultation requirements, under workplace health and safety requirements. The regulation would merely provide clarity and ensure that responsible duty holders are auditable so that compliance can be monitored.

Victoria assumed an annual review of the entire plan would take 10 hours at a cost of \$763.70.⁵³ During consultation on the TOLAA amendments, one stakeholder estimated the annual review cost at \$500 per annum. However, as maintenance of the safety management plan is implied through the Act provisions (because to comply with the Act, the safety management plan would always need to be up to date), the regulation provisions merely provide clarity for operators about minimum expectations. In addition, all costs and resourcing will likely vary depending on the nature of the review trigger and the nature and complexity of the responsible duty holder's business. For example, not all events will involve comprehensive recasting of the safety management plan, and an annual review of a small operation by the operator themselves will likely be less costly.

Overall, the cost and the likely frequency of reviews is not considered to be overly burdensome given the greater safety benefits from proactive and ongoing risk management.

Audit notices and audit reports

Option 1 would mean the department would not have to include a minimum level of information in an audit notice when advising someone of an audit, or in the report relating to the outcomes of the audit. This would reduce industry certainty about the process, potentially reduce the effectiveness of the audit and reduce the transparency and accountability of government through the audit process.

Option 2 would provide some minimum matters to be included in the audit notices and reports. The proposed requirements for audit notices are that they include:

- The way the audit is to be carried out, including examples to show the audit can be carried out in person at the premises of the person being audited or by desktop at the auditor's place of work;
- The name of the person who will carry out the audit; and
- If the person is an authorised officer – a summary of the officer's powers under the PT Act that are relevant to carrying out the audit.

The proposed requirements for audit reports are that they include:

- The name of the person who carried out the audit;
- The period during which the audit was carried out;
- Each place where the audit was carried out;

⁵³ Department of Transport (Victoria) 2020, *Bus safety regulations 2020: Regulatory impact statement*, page 88. last updated 24 May 2021, accessed 1 July 2022, <https://www.vic.gov.au/sites/default/files/2020-09/Bus-Safety-Regulations-2020-RIS.docx>

- The name and address of each person whose business activities were audited; and
- The findings made by the person who carried out the audit and the person's reasons for the findings.

These are generally consistent with existing requirements for audit notices applying to personalised transport.⁵⁴ This approach provides some certainty and transparency of process for those being audited. The administrative impacts would be borne entirely by TMR.

Who was consulted?

Targeted industry consultation on proposed regulations about safety management plans was conducted with peak bodies in August 2024, via 'live' information sessions, followed by invitations to provide written feedback on specific aspects of the proposal. In April 2024, TMR presented on the future safety management framework at the QBIC Annual Conference, reflecting that the bus industry is the segment of the industry most impacted by these changes. Targeted industry consultation on proposed regulations about SMPs was conducted with QBIC and QSBA in August 2024, via information sessions, followed by invitations to provide written feedback on specific aspects of the proposal. TMR also provided an update on the progress of the project to the QBIC Annual Conference in April 2025. TMR has also had ongoing informal consultation with QBIC and QSBA through regular stakeholder meetings.

Overall, stakeholders were supportive of the proposed regulatory settings for safety management plans. Key concerns were around the perceived administrative burden associated with developing and complying with safety management plans, and the difficulties with educating new duty holders about their obligations under the framework, including how to conduct comprehensive and fit-for-purpose risk assessment processes. Industry requested additional guidance from TMR on details of how safety management plans will operate in practice, such as how many safety management plans will be required for one entity that operates buses across many locations and routes.

TMR's implementation activities will effectively address stakeholder concerns including through provision of industry guidance material to support industry implementation of safety management plan requirements. TMR will continue to work with peak bodies and industry reference groups through implementation to build, and ultimately embed, a safety culture in industry operations. TMR's guidance materials will also provide tailored information to support small to medium sized industry providers, to enable them to understand their obligations.

What is the recommended option and why?

Requirements for safety management plans

It is recommended that Option 3 (introduce a 'light touch' regulation model) be progressed. This provides the highest overall net benefit and more closely aligns with government objectives to provide safe public transport services to Queensland communities.

The benefits are likely to be moderately higher under the preferred option due to promoting enhanced proactive risk management by industry and enabling of proactive compliance and enforcement activities by TMR. The additional administrative impacts on industry providers will be offset by the expected improved safety outcomes for passengers, drivers, the public – and the industry more broadly.

Given the existing requirement in TOLAA, and safety obligations under the *Workplace Health and Safety Act 2011* and HVNL Act, the cost impacts of the proposed changes are expected to be minimal – and contained to operators, community transport organisations and booking service providers. These costs are anticipated to be attributed to a time commitment by staff to complete regular and, where appropriate, reactive, reviews of safety management plans.

The proposed approach aims to keep compliance costs low by not imposing overly prescriptive requirements on responsible duty holders. Financial/economic and social costs of compliance with this proposal are expected to be minimal. TMR intends to alleviate compliance costs for industry by providing guidance on how to comply with their safety management plan requirements, which will be useful for small to medium size service providers.

Audit notices and audit reports

⁵⁴ Sections 112 and 113 of the PT Regulation.

It is recommended that Option 2 (prescribe requirements in the PT Regulation) be progressed as it provides the highest overall benefit for both industry and government. It perpetuates the established model for audit notices and reports currently applied to personalised transport audits, with minor adaptations. It imposes no regulatory burden on industry, while maintaining a level of transparency and accountability regarding the audit processes.

Impact assessment

All proposals

	First full year	First 10 years
Direct costs – Compliance costs	Negligible (see 'What are the impacts?' for detail)	Negligible (see 'What are the impacts?' for detail)
Direct costs – Government costs	Nil additional costs	Nil additional costs

Signed



Andrew Mahon
Acting Director-General
Department of Transport and Main Roads



Brent Mickelberg MP
Minister for Transport and Main Roads

Date: 7 / 1 / 2026

Date: 8 / 1 / 2026