
From: Russell Jeffriess
Sent: Monday, 19 August 2019 12:28 PM
To: Tow Truck Industry Regulation 2019
Subject: HPE CM: Tow reforms

re tow truck reforms

1. Exclusion of multi deck car carriers

The multi deck car carrier exemption as explained in the reforms states that these vehicles fall under the act in regards to the operation of the lifting of the decks. I suggest the issue should be that these vehicles fall into the tow truck act when transporting damaged vehicles. As I understand it ,the vehicle must be able to be driven on under its own motive power and if this is not the case the transporter must be a licensed tow truck . A recent visit to an auction yard in Sydney only reinforces this argument where multi deck car carriers can only be loaded or unloaded with forklifts due to the cars damage. The RMS and the police seem to disregard this practice as I know from personal experience.

Multi deck carriers moving drive on drive off vehicles should be exempt from the act but The movement of damaged vehicles should be another matter altogether.

2. Proof of entitlement for Holding Yard

Any holding yard should be in an approved industrial estate or zone. Requirements such as noise and operating hours are important to ensure local council and state government guidelines are adhered to. I also do not agree with the exemption for heavy wreckers as some of these operators work out of residential premises operating 24 hours a day with no regulatory policing.

15.Towing of recreational vehicles

The reforms state that the towing of recreational vehicles from manufacturers or trade shows should be exempt from licensing. The reforms have not addressed the transport of damaged recreational vehicles which should come under the act. Would trailers such as box and car trailers be also exempt .

16. Mechanics exemption

I cannot agree with this exemption as all tow trucks I believe are inspected by RMS annually for registration purposes.

In the case of a Blue Slip or original inspection the vehicle is not technically a tow truck until registered as such. In a situation where the vehicle is being repaired or brake tested may hold a valid point but Mechanics have an approval to brake test on a road designated by RMS anyway.The exemption could be designated to that section of road and not to carry a load on such vehicle being tested would alleviate abuse of the system.

I have commented on the above points which I feel are most important.

Just on one of the points in the reforms in regard to higher penalties for operators doing the wrong thing.

I can't help but think that Fair Trading should perhaps concentrate more on enforcing the act on non licensed operators. It seems everyday I look on Facebook there is another unlicensed guy with a car trailer advertising towing. I personally know one guy who was taking 5 scrap cars a week to Sydney from my area with pensioner concession on his rego. He also has pensioner concession rego on his 9000 kg GVM truck. There are also some local mechanics using car trailers to pick up clients broken down cars. As a licensed operator with the substantial cost of operating a tow truck it is very difficult to compete in this environment.

I will submit the online form but the main points above are of most concern to me at the moment

Thanks you for opportunity to be able to comment on the reforms

Russel Jeffriess

