

Tow Truck Bill 2023

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28 July 2023

Committee Secretary
Transport and Resources Committee
Parliament House, George Street
Brisbane QLD 4000

Dear Committee Secretary,

The Sunshine Coast Regional Towing Association has been operating for over 30 years, representing all licensed operators on the Sunshine Coast. It also manages the Police Towing Roster, which contains over 50 licensed tow trucks.

Our association have watched the public hearing in Parliament and the tow operators opinions to the Tow Truck Bill 2023. Our associations support the concerns raise and after discussions with members have addressed our concerns.

- There was mention in the hearing that RACQ was holding a private meeting with government. We do have concerns that operators have taken an open approach in their concerns, yet RACQ who may be look upon as an advocacy for the industry are having meeting behind closed doors. RACQ are an insurance company with a financial interest. Is this going to blur their objectivity to help the community or more to help their bottom line?
- We agree with the need to have more a central or additional Towing associations that work towards self-regulation. We have found this to be a more structured approach rather than over-regulation by government authorities.
- **Part 4 Div 2 Sec 57 Preventing damage to towed motor vehicles**
This is not something the association has seen be an issue previously. In our industry, operators have insurances to cover for damages. Introducing extra penalties can be misinterpreted and make it harder to employ tow operators. We are already in a high pressure operation industry without adding the risk of large penalties imposed.
- **Part 4, Div 3, Sec 64 Requirement to obtain tow authority**
This section needs some clarity in that towing authority book can only be carried in a licensed tow truck, that only a licenced operator and licensed tow truck and tow truck suitable to tow can attend the scene of the accident to organise or obtain authority for tow. This will help clear the roads quicker as it reduces the risk of tows being obtained by operators who do not have the required equipment on site.
- **Part 4, Div 3, Sec 65 Carrying out private property towing without private property towing consent**
No operator in our association perform private property towaways when the regulations made it unviable and unworkable. It has always been our concern that government will bring in regulations and changes without proper industry consultation, in the same manner as this has been proposed.
- **Part 8, Division 2, Subdivision 1 - 157 Existing regulated areas**
Our membership want to convey that we feel regulated areas should remain as they currently are. Expansion of these areas would lead to smaller, unlicensed operators, currently operating in these unregulated areas not having the volume of work to justify following the strict requirements to be a regulated operator. This would lead to extra costs to the motoring public for operators to travel further to provide help.

- The removal of **Section 22 (Authority to repair)** will only lead to more confusion on the roadside to the public/ persons involved in the accident. This could also lead to the operator coercing the public into making decision to go to a particular repairer where the operator may have a financial interest in going to.
- The removal of **Section 23 (Consideration for obtaining certain information or work)** allows operators to advertise for information in relation to location of accidents. It can also open up for operators to offer money and other items to persons at the scene of accident to obtain the tow. This combined with the previous authority to repair clause being removed would be a dangerous mix.
- Removal of Section 22 and Section 23 may cause operators with dishonest business practices to engage in unethical behaviour within the industry, resulting in additional distractions on the scene and causing time delays.

In conclusion, we would like to emphasise the need to consult operators in the industry prior to implementing amendments. We feel some sections of this Bill are great examples of how small changes proposed can affect and cause disruption in an industry which is already highly regulated and conduct high pressure operations.

Our associations appreciate the chance to discuss our opinions and discuss any future contributions that may arise.

Yours sincerely

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