

Facsimile: (03) 9876 3192 Oralea Pty Ltd A.C.N. 006 057 352

Telephone : (03) 9879 0171

12th April 2010

Essential Services Commission Level 2, 35 Spring Street Melbourne 3000

Comment on Draft Report - Review of Accident towing and Storage Fees

Dear Sir,

With reference to the proposed salvage charges, for motor vehicles under 4.00 tonnes gvm, within the state of Victoria, and in particular within the accident allocation controlled area.

Our company works within the heavy salvage area of towing, and have done so for the past thirty five years – we do not tow cars from accident scenes. We are nevertheless frequently called to provide heavy salvage equipment, to salvage cars from positions, that the allocated operator is unable to perform the salvage – due either to degree of difficulty or distance off the roadway. Tilt trays, generally only carry enough winch cable on their winch drums, to pull a car onto the tray of the tow truck.

The towing industry within Australia has basically two types of tow trucks operating.

(1)Tilt tray towing for ear towing, there are very few conventional tow trucks operating anymore, as the design of the modern car precludes their use.

(2) There is then a big step up to heavy salvage tow trucks – these work predominantly on the towing and salvage of vehicles over 4.00 tonnes gvm. These vehicles are currently being reviewed by Vic Roads and are being pushed towards triaxle tow trucks to support the weight requirements of Vic Roads bridges and roads. We are looking at a market force cost of around \$600,000 to build these vehicles. The current fleet in Melbourne numbers around 20 trucks.

Once an operation has gone beyond the scope/ability of a tilt tray to salvage it, there is virtually no other option, but to call in a heavy salvage tow truck.

Depending where you are based, this may or may not be a common occurrence. Our own company is based near the Mt. Dandenong Ranges and we would probably do, on average, around two or three heavy salvages a week for cars. We are frequently called directly by the police to salvage a car, and it is then allocated to a conventional tilt tray for towing.

Some of these salvages will require the use of the crane, which is mounted on the back of our recovery vehicles, and all would require the use of our winches. Some will require the winding out of hundreds of feet of cable and the use of snatch blocks.

Many of these recoveries are carried out in the middle of the night, when we are required to call a driver, out of his bed, and send him up into the mountains to salvage a vehicle. Whilst we would much prefer to salvage the vehicles during daylight hours, the police insist that they be done at night. This has a twofold reasoning –

- (1) To prevent the theft of parts of the car, and
- (2) To stop other people, who witness the accident damaged vehicle, stopping and re-calling the police and putting themselves in danger whilst they check the vehicle for occupants.

It is simply not possible to supply this service, with the equipment that our current regulations require us to have, at the salvage rates that are suggested in the draft document. Our drivers wages alone, would take us over the cost of supplying the service, with no further allowance to cover the costs of our vehicles, and the ancillary equipment that is required to safely carry out the salvage.

We must work within all OH & S requirements, covering safety of the plant we provide our drivers, and the conditions that they must work in.

Consequently, there needs to be some provision, made for heavy salvage operations, if there is to be a salvage charge, which is regulated. We simply cannot salvage cars for the rates proposed. It is imperative that small truck operators feel they can call in heavy salvage trucks if the work is beyond their capacity – the consequences for not being able to do so, would be trucks working way above the capacity of both truck and driver, and the possible accidents that may occur as a result of this.

We have attached herewith some photos taken at scenes where we have carried out a heavy salvage operation. You will note that all of these photos are taken in daylight. Those that we have taken at night are not clear. Consideration needs to be given, as to how we take photos, at night, of a salvage operation that can be hundreds of feet down an embankment. Whilst we can photograph the car in situ, this may not be a reflection of the degree of salvage required to winch the vehicle back to the roadway.

Yours faithfully Eagle Towing & Salvage

Will Sampson

Ruth Sampson Director.