

Bulletin

Towing Operators Division and Body Repairers Division



Reference No. Accident towing fees review/kz-02-222

Date: 14/02/2022

VACC's submission to the Essential Services Commission's accident towing fees review 2021 - Draft report

Dear Members

The Victorian Automotive Chamber of Commerce (VACC) has responded to the Essential Services Commissions' (ESC) Accident towing fees review 2021 - Draft report which was released on 22 December 2021.

Please take this [link](#) to the submission.

VACC was disappointed the ESC did not thoroughly consider the views of industry before releasing its Draft report. VACC reiterate the comments raised in the 6 August 2021 submission to the ESC's consultation paper, including the report of Deloitte Access Economics.

The submission to the Draft Report makes the following key points:

- The ESC has not adequately consulted with the accident towing industry.
- Given the lack of consultation, and the uncertainty around the industry itself (as a result of disruptions from the COVID-19 pandemic and technological and other changes), the ESC should issue an interim fee recommendation.
- A cost-of-service approach remains valid and would be supported with appropriate industry consultation, which has not yet occurred.
- A benchmarking approach is not appropriate and is not supported by the evidence presented.
- The application of a productivity adjustment is not justified.

Please take this [link](#) to the ESC Draft Report.

Please take this [link](#) to the ESC's consultants report.

If you need further information, please contact me on 03 9829 1142.

Kind regards

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