



**Insurance Council
of Australia**

Essential Services Commission
Level 8 570 Bourke St
Melbourne Victoria 3000

10 February 2021

By email: transport@esc.vic.gov.au

Essential Services Commission (ESC): Accident towing fees review 2021 draft report

The Insurance Council of Australia (ICA) welcomes the opportunity to provide a further submission to the Essential Services Commission's (ESC) 2021 Accident towing fees review. We thank the ESC for considering the ICA's feedback and note the draft report recommendations.

In line with its submission on 6 August 2021 ICA suggests an additional recommendation be made by the ESC requiring storage operators to notify vehicle owners (or their insurers) of the location of their vehicle within a reasonable timeframe.

As well as providing transparency and peace-of-mind to vehicle owners who've just experienced an accident, prompt notification of vehicle location will expedite the repair process, meaning that insurance customers will have their vehicles back on the road sooner. In our view, such a requirement would be cost-effective to implement and substantially improve the experience of vehicle owners who would be going through a stressful time.

Furthermore, we believe that there is scope for the ESC to consider recommending that storage operators who charge a premium for undercover vehicle storage be required to produce evidence that such a service has been provided – for example a photo of the vehicle being placed undercover. Again, we believe this would place minimum burden on storage operators and act as an effective deterrent to any potential inappropriate charging of undercover vehicle storage rates.

We trust that this feedback has been of assistance to the ESC and we look forward to reading the final report. Please contact Sam Xu, Senior Policy Advisor on 0407 934 020 or by email s.xu@insurancecouncil.com.au if you have any questions or would like further information.

Regards,

Anne Knight

A/General Manager Consumer Outcomes Policy