

We are writing to you today because of the gross inability of the State government, Vic Roads, CPVV, State Revenue and Victoria Police to regulate illegal hire car operators including H plates, which have destroyed the hire car industry in Victoria. It is a free for all for anybody with four wheels to become an illegal hire car operator. The precedent was set by the State Government by allowing Uber to operate illegally for three years which has encouraged 1000's of operators to work under the radar. This is sending legal operators to the wall.

Lets talk about H plated cars. There are more than 80,000 permitted cars in Victoria. When H plated cars were first introduced many years ago, they were only to be used on club event days for enthusiasts. They are today being used for commercial gain such as Weddings, School Formals, Debutante Balls, Winery Tours, Airport Transfers & general hire. These H plated vehicles are running businesses and advertising on the internet with web pages, Face book & Instagram, gumtree and even local papers. They are also being used for day to day usage. Parked in long term carparks at the airport and shopping centres. In the last four to five years there has been a massive increase in ownership of H plates due to the fact that it is cheap registration of \$140.00, cheap car insurance because they put down that they are doing low kilometres. They are also fully covered by the TAC in the event of an accident. We are subsidizing this by paying our Registration of around \$800. They also know all Government Departments ie: Vic Roads, CPVV, Vic Police and the State Government are asleep on the job and do nothing. When a H plated car is sold to another buyer there is no stamp duty to pay.

People have now worked out that they can avoid paying stamp duty and full registration at a huge loss to the State Government which honest people are subsidizing through paying full Registration. Cars for sale that have full registration and over 25 years old are now deregistering them and putting H plates on to save on the taxes whether they are sold for \$5000 or \$500,000.

Some car clubs in Melbourne are advertising if you have a car over 25 years, why pay full Registration. They will organize to get the H plates and paperwork delivered to your door for the cost of between \$250 and \$300.

To summarize, the H plates are killing the hire car industry. They are not registered vehicles, not commercial vehicles and probably not licensed car chauffeurs, but continue to operate under Vic Roads and the State Governments noses.

Over the last ten months we have supplied John Lewis from Vic Roads and the CPVV and the State Revenue Office factual evidence of many illegal operators that are advertising and working as hire cars every week. Yet 10 months later John Lewis has not revoked any permits and they are still working today and advertising their businesses. We have requested a meeting with John Lewis and he has not even had the decency to respond in any shape or form. We have also asked him for an updated Rules & Regulations as the web page for Vic Roads is out of date. ALSO NO REPLY.....

**SECOND TYPE OF ILLEGAL HIRE CARS. NOT H PLATED VEHICLES.**

Illegal operators that are not registered as a hire car through the CPVV or with the State Revenue Office. These hire cars come in all shapes and forms. They can be stretch limousines, hummers, exotic cars or everyday cars. These operators whether it be a stretch limousine or sedan are not registered with the CPVV and do not carry commercial insurance or indemnity insurance. Some drivers may not even be DC licensed, which means they are not police checked. Some are the biggest hire car companies in Melbourne and are not registered with the CPVV or State Revenue. CPVV have been operating for a long time but so have these older hire car companies that have never been registered with them and now we have new companies not registering either. We estimate when it comes to hire cars, at least 50% or more are illegal. These companies are swapping registration plates between vehicles and blacking out the plates when advertising through Social Media.

We are the dumb bunnies doing the right thing by paying our registrations and taxes and high insurances and are having to try and compete against these illegal operators and the government is allowing them to operate illegally.

Some limousine companies are actually brokers who advertise cars that they don't own but supply work to them. They use photos also of cars that they don't have legal access to and have obtained and advertised illegally. My Limousine photo is being used illegally on two different web sites without my approval offering it for hire. There is also an element of crime involving bikie gangs, drugs & organized crime owning illegal limousine companies which seems to be growing.

I have spoken to a Highway Patrol Superintendent and other police and they do not know the regulations regarding hire Cars and H plates. They do not pull them over and it is not a priority. I have been waved through at least three times at a booze bus and never been asked to show a license or DC license. Also no checking of children under eight being restrained in child seats. It is amazing how many limousines don't do this and allow children to be seated in limousines unrestrained, even babies on laps. Working with children is also a requirement when doing either children's birthdays or graduations and debutante balls. We believe only 10% of drivers would have working with children.

Another form of illegal operator is people that are hiring buses and vans from Budget and other hire car companies and charging people and running wine tours and airport pickups and making a fortune. I have spoken to a bus rental company and they couldn't care less, he was just interested in their sale.

We are fed up with Vic Roads, CPVV, State Revenue office, Victoria Police and the State Government's inaction to fine illegal operators and make them either a legal operator or shut them down so at least we have a level playing field. At this stage all we are getting is that they have sent them letters while we have our businesses go to the wall.

We feel that the best way to eliminate illegal hire cars would be to have special coloured number plates with specific letters and numbers so that 100 metres they can be recognized by the public, Police, Vic Roads or CPVV. This would immediately identify all illegal hire car operators to the public and governing bodies. At the moment the CPVV allows signs

approximately 6 cm x 6 cm on the windscreen which is not visible from a distance of more than 3 metres.

If needed we would be happy to speak with any politicians about the hire car industry.

Thank you for taking this matter up. If we do not see any substantial results in the near future, we will have no option but to approach the media with this as we have our livelihoods to consider as these are diminishing fast.

#### HOW ILLEGAL OPERATORS ARE AFFECTING LEGAL OPERATORS AND HOW THEY ARE PUTTING THE PUBLIC AT RISK.

Let me explain how they operate here in Victoria.

##### Section 1 – H Plates / Club plates.

Illegal use H plated vehicles, which there are around 80,000 to 90,000. This is according to a Vic Roads spokesperson on Neil Mitchells 3aw program in January of this year. We have sent Vic Roads and the CPVV lists of numerous operators that have been advertising on Facebook, Instagram, Twitter and web sites. Some of these people have been operating since 2013 as illegal Hire car businesses and they are taking income off fully registered hire car operators. This amounts to 100's of jobs lost per week. such as Weddings, airport transfers, school formals, debs, graduations, funerals and all general hire jobs. These operators are not licensed vehicles through the CPVV, not DC licensed drivers, no police checks, no working with children certificates and no commercial insurance what so ever. They have no public liability, and there have been no annual roadworthys done on the vehicles which is mandatory for legal hire cars.

We have been working with Vic roads continually reporting these illegal operators, we have given Vic Roads enough evidence to shut these people down along with their clubs but they have only sent them letters and have said that they don't have the authority to shut them down and have handballed it to the CPVV. We have grave concerns as to whether the CPVV with the added burden of the H plated vehicles can deal with this as they are stretched to the limit. Inspectors do not work on the weekends when these vehicles are on the roads. There is also the factor of the criminal element with some of these operators in all areas of the hire car industry. Our members are confronting these people when out doing weddings and general hire jobs.

These members have been threatened and chased after taking photos of H plated vehicles and we feel that this could get violent due to them taking income from legal operators, which has dropped by about 30 – 40% in the last couple of years.

H plated vehicles cannot be used as commercial hire cars under any circumstances as they are only permitted to be used for club events.

##### Section 2/ Illegal operators but registered as a private registered vehicle.

These operators come in different shapes and forms. They can be stretch limousines, modern sedans, vintage, classic cars or vans and buses. We believe that there are thousands of the above working in Melbourne and country areas. They are not registered with the CPVV as hire cars and are unlicensed DC drivers and carry no commercial insurance, no roadworthys, no public liability insurance, no police checks and no working with children. Some of these illegal operators are connected to crime and some are the biggest limousine hire companies in Melbourne and are well known to the public. Some only have one or two vehicles and others have up to forty, and advertise on multiple websites and Instagram. Some of these limousines are well known and do children's themed birthday parties and do not supply car seats for under seven year olds. I have witnessed this on numerous occasions. We also feel that the inaction of the police and Vic roads as they are not pulling over and checking these vehicles which is allowing these laws to be broken.

If a limousine was to be involved in an accident with unrestrained children in the back of the limousine, there would be either horrific injuries or death. This will occur if nothing is done. The Government is sending the wrong message by allowing Taxi's to carry children with not supplying car seats, but this is not the law for other hire vehicles.

Section 3/ Vans, minibuses and buses.

These operators are registered for private use but are illegally hiring them for Winery Tours, Weddings, airport pickups and General hire. Again not registered with the CPVV, no licences, no public liability insurance, no police checks or working with children.

Section 4/ Illegal operators hiring vans, cars and minibuses from hire car rental companies.

These operators hire a car, van or minibus from a rental company whether it be Hertz, budget or other company and then proceed to hire them out for hire car operations doing tours, wedding guests and general hire. Also have none of the requirements that legal operators are made to have.

By allowing these illegal operators to operate, we are putting the public and our children in grave danger of serious injury or death. We need Vic roads, CPVV, Victoria Police and the Victorian Government to get control and work together and get rid of these illegal operators as the legal operators are going broke and leaving the industry.

We would like to arrange a meeting to discuss the above issues which has now reached a crisis point in the hire car industry.

Kind regards,

Rob Lightowler & Rob Brewer.  
Committee Members of the  
Wedding Car Association.