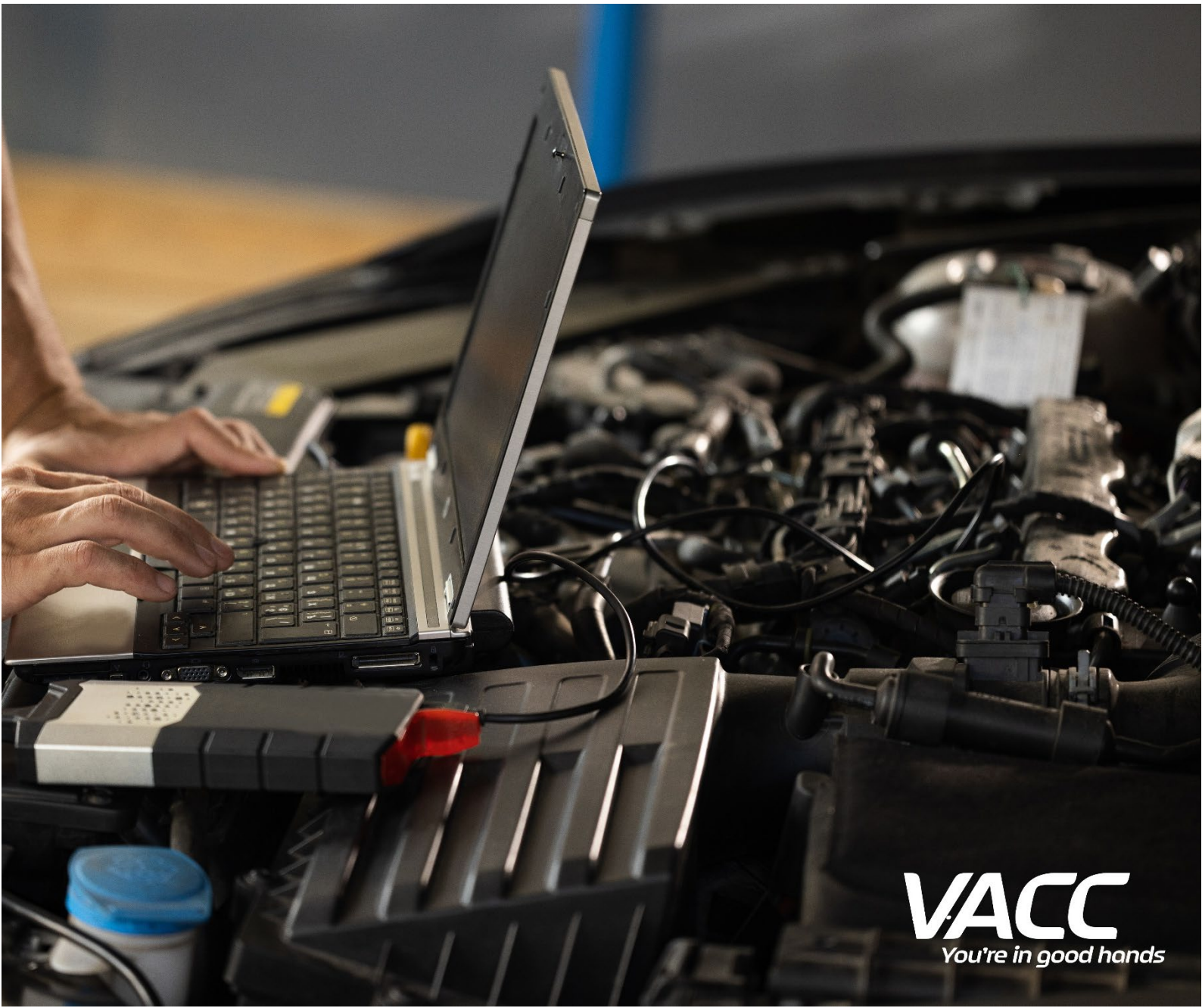
VACC Submission

Review of the Motor Vehicle Service and Repair Information Sharing Scheme

August 2025



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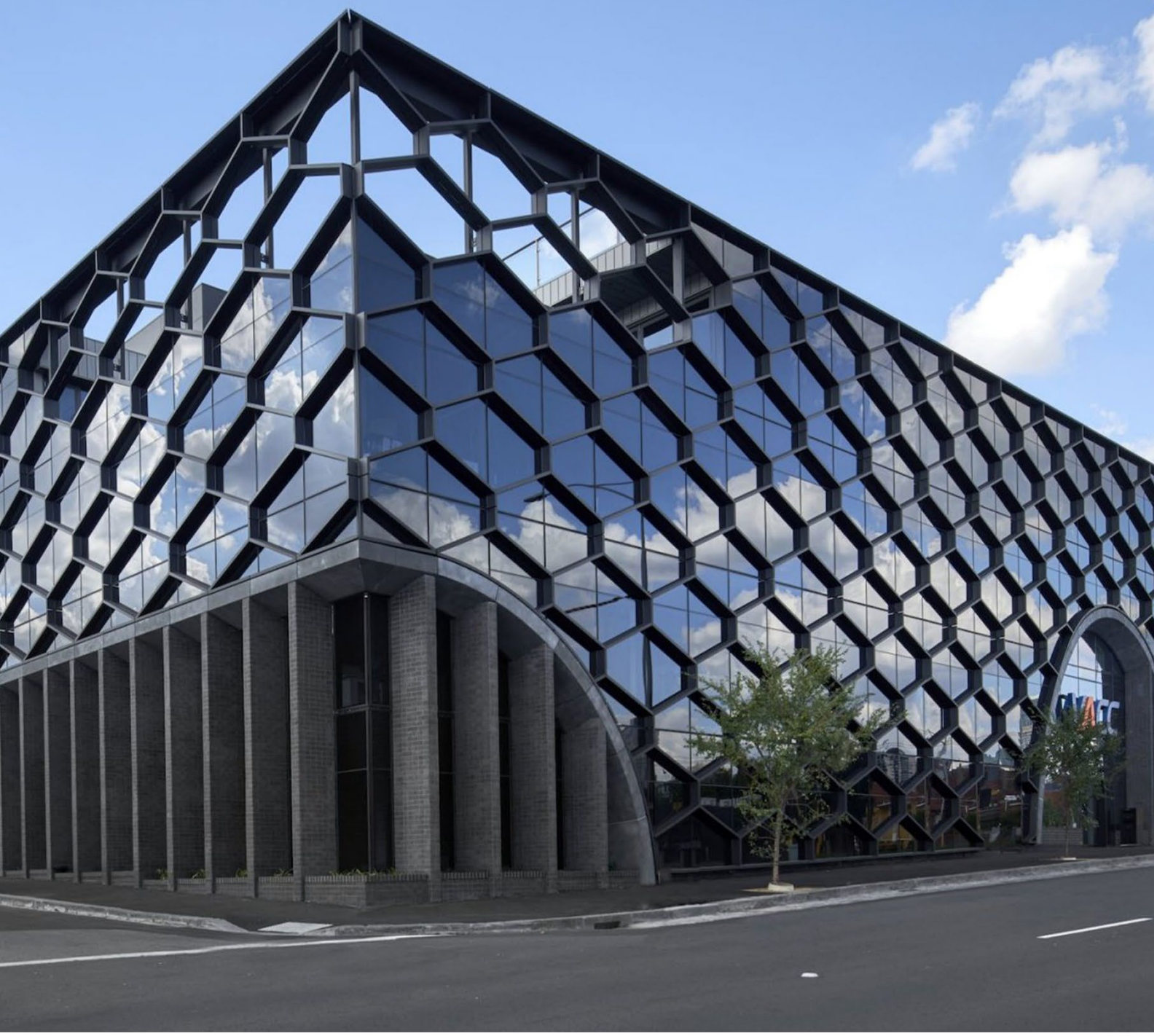
About VACC

The Victorian Automotive Chamber of Commerce (VACC) is Victoria's peak automotive industry association, representing the interests of more than 5,000 members in over 20 retail automotive sectors that employ over 50,000 Victorians. VACC members range from new and used vehicle dealers (passenger, truck, commercial, motorcycles, recreational and farm machinery), repairers (mechanical, electrical, body and repair specialists, i.e. radiators and engines), vehicle servicing (service stations, vehicle washing, rental, windscreens), parts and component wholesale/retail and distribution and aftermarket manufacture (i.e. specialist vehicle, parts or component modification and/or manufacture), towing operators, tyre dealers and automotive dismantlers and recyclers.

VACC is also an active member of the Motor Trades Association of Australia (MTAA) and contributes significantly to the national policy debate through Australia's peak national automotive association.



Contents

Introduction

The Victorian Automotive Chamber of Commerce (VACC) welcomes the opportunity to provide the following submission to the Treasury's review of the Motor Vehicle Service and Repair Information Sharing Scheme (Scheme).

The Scheme, launched in July 2022, is a world-leading legislative framework that provides automotive repairers equal access to repair information, helping maintain Australia's aging fleet and ensure safety.

VACC acknowledges the significant progress to date towards meeting the Scheme's objectives, and believes that addressing the issues raised in this submission will ensure the long-term success and fairness of the Scheme.

The responses below to the discussion paper questions have been informed by feedback gathered from a survey of VACC members. VACC is willing to provide further information or examples to the Treasury as it moves through its consultation and review processes.

List of recommendations

Recommendation 1

Amend the Competition and Consumer (Motor Vehicle Service and Repair Information Sharing Scheme) Rules 2021 to explicitly prescribe that each of the following is a type of Scheme Information, for the purposes of section 57BD of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021*:

- vehicle telematics data and information;
- electronic logbooks;
- all service and repair information for vehicles with Level 3 and above automated driving systems (as Safety information); and
- software updates where they are the remedy for known faults.

Recommendation 2

Greater regulatory oversight and enforcement are required to improve data providers' compliance with the Scheme, including in relation to providing access to service campaign information and Technical Service Bulletins.

This should be supported by AASRA promoting reporting mechanisms for repairers and RTOs for non-compliance or difficulties in accessing information, with a pathway for timely resolution for participating and non-participating brands through AASRA.

Recommendation 3

Introduce a uniform standard for portal onboarding across all data providers, including:

- Timely user verification and password reset processes
- Functional support channels with clear escalation pathways
- Defined service level agreements (SLAs) for registration and access issues
- Mandate the availability of onboarding materials (e.g. videos, guides) for all independent users, with no unjustified access restrictions.

Empower AASRA with oversight authority to:

- Monitor OEM portal performance
- track registration issues
- intervene in prolonged or systemic failures.

Publish key performance metrics (e.g. average registration time per OEM) to improve transparency and accountability.

Encourage the ACCC and Scheme Adviser to monitor activation timeframes as part of compliance checks, not just the availability of information once access is granted.

Recommendation 4

Amend s57CA 7 (b) of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to specify that data providers must provide the Scheme Adviser with their updated Scheme Offer within 30 minutes of making any change to the Scheme Offer.

Recommendation 5

Amend s57DA of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to require that data providers separate all safety and security information from general service and repair data.

Recommendation 6

Amend the *Competition and Consumer (Motor Vehicle Service and Repair Information Sharing Scheme) Rules 2021* to prescribe that Scheme Information includes all relevant and up to date training materials, including technical guidance and portal navigation tutorials.

Recommendation 7

A targeted national awareness campaign is recommended to promote the Scheme, particularly among smaller and regional workshops. This could include:

- AASRA developing and distributing clear, user-friendly guidance materials to assist repairers in navigating access pathways and available tools
- AASRA and the ACCC collaborating with industry associations and training providers to integrate MVIS access knowledge into ongoing professional development
- AASRA developing technical guidance and training support to help independent repairers and RTOs build competency in emerging areas like software-based diagnostics, programming, and EV system integration.

Recommendation 8

Amend the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to require that all data providers offer Pass-Thru programming capabilities and procedures through the Scheme framework, where supported by the vehicle architecture.

Recommendation 9

Amend Section 57BA of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to introduce a standardised format or interface guidelines for service information portals, including:

- logical menu structures
- search functions by VIN, keyword, or fault code – for example, identification of vehicle variants through VIN search
- consistent labelling of common repair categories (e.g. brakes, driveline, ADAS, etc.)
- access to portal usage guides or video tutorials
- a library listing the Scheme Information available immediately for each vehicle, as well as the information not readily available along with the relevant justification
- onboarding documentation or training for their platforms under the Scheme, especially where systems are known to be complex.

Recommendation 10

AASRA should be funded to administer an Australian-wide “access hub” or aggregator tool that simplifies entry into multiple OEM portals through a central interface, in consultation with industry.

Recommendation 11

That the Australian Government consult with OEMs and franchised dealership before legislating further obligations under the Scheme, or through other regulatory frameworks impacting the automotive industry.

Recommendation 12

Amend Section 57BA of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to include motorcycles, heavy vehicles, farm machinery, and recreational vehicles within the Scheme.

Recommendation 13

The Australian Government should ensure that AASRA is appropriately resourced to assist with dispute resolution where informal processes fail, and direct AASRA to publish anonymised summaries of common access issues and resolutions, to guide industry and increase transparency.

Recommendation 14

AASRA should develop simple guidance material outlining the dispute resolution process to make the process more transparent and easier to engage with. This should include:

- when and how to escalate a complaint
- what information to provide
- expected timeframes for resolution.

AASRA should also provide guidelines on transparency and communication protocols to ensure that repairers receive updates throughout the resolution process, not just at closure.

Recommendation 15

The Australian government should provide additional support or resourcing to AASRA to ensure timely and consistent handling of Missing Information Reports and other dispute-related functions. This funding should be tied to the publication of performance benchmarks or service standards for MIR response and resolution timeframes.

Recommendation 16

The Scheme should be expanded to cover both access to service and repair information, as well as access to any and all associated parts required to repair a Scheme vehicle, on commercially fair and reasonable terms.

Recommendation 17

Expand the application of the Scheme's security protocols to include access to security-related parts (not just repair information), such as those governed under OEM TRP policies, by developing a uniform national process for verifying legitimate access to security related parts to be administered by AASRA.

Recommendation 18

Include electronic parts catalogues within the meaning of Scheme Information s57BD of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021.*

Recommendation 19

Amend s57CA(5) of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to specify that a data provider's terms and conditions must include information regarding the data provider's process for storing sensitive information, including safeguards to ensure this information is not stored on servers outside of Australia.

VACC responses to discussion questions

Information provision

Q 1. Does the Scheme apply appropriately to the information needed for:

> ***Q1.1 Australian repairers to diagnose faults, service, repair modify or dismantle Scheme vehicles, and;***
>
> ***Q1.2 Scheme RTOs to provide training for diagnosing faults with, servicing, repairing, modifying or dismantling Scheme vehicles?***

Q 2. What impact, if any, does the scope of information presently included in, and excluded from, the operation of the Scheme have on the ability of repairers and Scheme RTOs to conduct repairs and training?

The Scheme aims to provide motor vehicle repairers access to the information necessary to diagnose faults, service, repair, modify, or dismantle Scheme vehicles.

VACC submits that although the Scheme has certainly improved access to this information for repairers, it nonetheless falls short of the Government's stated objective of 'establishing a fair playing field' due to shortcomings in the types of information captured by the Scheme's mandate.

In particular, VACC considers that while the definition of "Scheme Information" under section 57BD of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* is appropriate, the scope of what is captured by this definition is too restrictive, undermining the objectives of the Scheme.

Specific examples are discussed further below.

Logbooks

While the Explanatory Memorandum to the Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Bill 2021 specifies that logbooks are not considered to be Scheme Information, VACC considers that the Scheme should be revised to allow all repairers the same level of access to view or update electronic or online logbooks. The primary concern here relates to the negative impact that incomplete repair records may have on the residual value of a motor vehicle, or on any associated warranties – which impedes competition for repairers who are unable to maintain the completeness of these records in the consumers' interest.

There are many Original Equipment Manufacturers (OEMs) that are already offering access to electronic logbooks. This provides independent repairers timely access to a vehicle's service history and the consumer with peace of mind and assurance that servicing is completed in accordance with the OEM service schedule requirements.

Vehicle Telematics

Vehicle telematics, the integration of telecommunications and informatics to monitor and transmit real-time vehicle data, is rapidly transforming the automotive aftermarket service and repair industry. While it offers potential benefits, it is also creating significant challenges and disruptions for independent repairers and workshops.

Modern vehicles equipped with telematics systems continuously collect data on performance, diagnostics, location, usage patterns, and maintenance needs. However, much of this data is transmitted directly to OEMs rather than being accessible to independent repairers. This undermines the ability of aftermarket businesses to:

- perform accurate diagnostics
- deliver timely maintenance reminders
- offer competitive services without OEM involvement.

OEMs are using telematics to build direct relationships with vehicle owners, bypassing traditional dealership and independent service channels. Examples include:

- remote diagnostics and over-the-air (OTA) updates
- automatic service scheduling through branded apps
- real-time alerts that direct consumers to authorised service centres.

This vertical integration is reducing aftermarket repairer touchpoints and shrinking market share.

Despite the disruption, telematics also opens new revenue streams for those who can adapt. These include:

- predictive maintenance services based on real-time diagnostics
- integration with fleet management systems for business clients
- enhanced customer engagement through connected service apps.

Case study 1: Restricted access to diagnostic data

A major Chinese electric vehicle (EV) manufacturer rapidly expanding in global markets including Australia, equips its vehicles with advanced telematics and over-the-air (OTA) capabilities. These systems collect and transmit extensive real-time data on vehicle diagnostics, battery health, software status, and performance directly to the manufacturer's central servers.

VACC members have reported that this manufacturer does not currently provide access to full diagnostic data. Instead:

- telematics data is routed exclusively to the manufacturer or to their authorised service centres
- independent workshops cannot retrieve fault codes or vehicle system status without using OEM-specific diagnostic tools and software, which are not available for third-party use
- OTA updates and some system calibrations can only be triggered remotely by the manufacturer, meaning independent repairers are locked out of key functions required to fully service these vehicles. This is especially important once a vehicle is out of its warranty period.

This scenario exemplifies how proprietary telematics systems can restrict competition in vehicle servicing by controlling access to critical repair data. Such practices undermine consumer choice and place independent repairers at a disadvantage.

Automated Driving Systems and Advanced Driver Assistance Systems

Advanced Driver Assistance Systems (ADAS) and automated driving systems (ADS) are becoming standard features in modern vehicles. While not new, the complexity and safety-critical nature of these systems will significantly increase with the introduction of Level 3 and higher automation capabilities.

Many vehicles currently on Australian roads already have level 3 capabilities. However, these capabilities have not yet been activated due to the lack of an Australian regulatory framework. We are already seeing robo-taxis expand in the USA and it is only time before the same applies here.

Despite this, access to service and repair information for vehicles equipped with Level 3+ automated systems was excluded under the original Scheme legislation. This omission poses a risk to road safety and limits the ability of independent repairers to service these vehicles effectively.

There is a growing number of qualified independent workshops and ADAS specialists across Australia that possess the technical expertise and equipment necessary to maintain and calibrate these systems. However, without access to up-to-date service procedures, diagnostic protocols, and calibration specifications, their ability to ensure safe and compliant repairs is severely hindered.

Importantly, repair information for these systems should be treated with the same regulatory sensitivity as high-voltage systems. To address legitimate safety concerns, a fit and proper person requirement, similar to what applies for EV repairs under the Scheme, could be applied. This would

ensure only suitably trained and accredited repairers gain access, while maintaining public safety.

Recommendation 1

Amend the Competition and Consumer (Motor Vehicle Service and Repair Information Sharing Scheme) Rules 2021 to explicitly prescribe that each of the following is a type of Scheme Information, for the purposes of section 57BD of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021*:

- vehicle telematics data and information;
- electronic logbooks;
- all service and repair information for vehicles with Level 3 and above automated driving systems (as Safety information); and
- software updates where they are the remedy for known faults.

Q 3. Are the obligations placed on data providers under the Scheme appropriate? Are data providers consistently providing Australian Repairers and Scheme RTOs access to Scheme Information in accordance with their obligations?

VACC considers that the obligations placed on data providers under the Scheme are generally clear and well-defined and remain appropriate. However, there is significant variation in the approaches taken by data providers to meet these obligations, which either stem from a lack of clarity around their obligations under the Scheme, or wilful non-compliance with those obligations.

VACC is aware of reports that service campaign information and technical service bulletins are not consistently made available across all data providers. These are essential resources not only for diagnosing and repairing faults, but also for performing accurate and up-to-date scheduled servicing, which is a routine part of vehicle maintenance across many brands. This lack of information provision can result in:

- missed or incorrect repairs
- delays in implementing known software updates or remedies
- vehicles being unnecessarily referred back to dealerships to repair or address issues already known within the OEM network.

This is especially problematic for independent workshops trying to provide timely, accurate, and cost-effective service. For customers, it leads to inconvenience and potential loss of confidence in their chosen repairer.

Furthermore, many service campaigns relate to known systemic faults and often require software updates. Without access to this information or the means to apply software updates, independent repairers are placed at a significant disadvantage, particularly as more faults are now resolved through software-based solutions.

Although TSBs and service campaign information are explicitly included in the definition of Scheme Information, their availability to independent repairers and Registered Training Organisations (RTOs) is not consistent across all manufacturers. This undermines the intent of the

Scheme and compromises the ability of industry participants to deliver timely and accurate repairs or training.

VACC recommends the ACCC undertake increased compliance and enforcement activity to ensure the Scheme achieves its intended outcomes of fairness, safety, and consumer choice.

Recommendation 2

Greater regulatory oversight and enforcement are required to improve data providers' compliance with the Scheme, including in relation to providing access to service campaign information and Technical Service Bulletins.

This should be supported by AASRA promoting reporting mechanisms for repairers and RTOs for non-compliance or difficulties in accessing information, with a pathway for timely resolution for participating and non-participating brands through AASRA.

Q 4. Should rights and obligations placed on data providers vary by type of data provider? If so, what distinct rights and obligations may support access to Scheme Information while ensuring competitive neutrality between data providers?

Third-party data providers, or data aggregators, play an important role in facilitating convenient and efficient access to service and repair information, typically covering a range of OEMs.

VACC considers that Scheme framework should allow for data aggregators to license Scheme Information from OEMs on commercially fair and reasonable terms.

Q 5. Is Scheme Information made available by data providers subject to reasonable terms?

VACC is not aware of Scheme Information being made available to repairers subject to any unreasonable terms.

Q 6. Do the requirements concerning timeframes for the provision of Scheme Information remain appropriate?

A survey of VACC members indicates that in most cases, access to information is provided within the legislated timeframes – typically immediately or within hours of the initial request. However, VACC is aware of some notable exceptions where procedural or administrative barriers are delaying timely access, especially during the initial account registration and approval process.

A significant example involves a repairer who waited almost 12 months to gain access to a major European OEM's information portal due to ongoing administrative delays. This case highlights a disconnect between legislative intent and actual user experience. Delays of this magnitude severely impact a workshop's ability to service vehicles effectively and compromise the Scheme's goal of supporting fair competition and consumer choice.

Case study 2: Persistent barriers in OEM portal registration

An independent workshop owner based in Victoria shared extensive difficulties in attempting to register with multiple OEMs under the Motor Vehicle Service and Repair Information Sharing Scheme. Despite satisfying the registration criteria, the repairer has experienced consistent and prolonged issues across several OEM portals, including login failures, lack of technical support, and complex or broken registration workflows.

Key barriers identified:

Complex and Unreliable Registration Processes

- The OEM accepted the repairer's credentials (including an EV certificate and a valid National Police Check), yet the portal repeatedly rejected login attempts, even after password resets.
- The portal sent a confirmation email with temporary login credentials, but access failed. Multiple reset attempts were unsuccessful.
- The portal sent a verification link but did not process the registration further, leaving the user in limbo.
- The OEM's system indicated the user was already registered but would not accept the credentials, nor send a reset email as claimed.
- The OEM's portal issued temporary login credentials, which were also rejected at the login stage.

Lack of support and resolution

- In many cases, there were no clear support pathways or response mechanisms. Users received no follow-up communication or assistance when errors occurred.
- Even when instructions were followed exactly, the systems would not function as described, causing wasted time and frustration.

The repairer noted: "If it wasn't for my persistent nature, I would give up on this process. It's not easy. As far as I'm concerned, the process is purposely difficult, knowing well that many mechanics will give up."

Lack of access to support resources within portals

On a major European OEM's portal, training videos designed to assist with navigation were inaccessible to independent repairers, even after registration attempts, stating the user was "not authorised."

Impact:

- Operational delays: The workshop was unable to access vital service and repair information in a timely manner, delaying diagnostic and software-based repairs.
- Business disruption: Inability to log in or register meant turning customers away or referring them back to dealers, affecting revenue and customer satisfaction.
- Barrier to entry: The system design discouraged legitimate, qualified repairers from participating, contradicting the intent of the Scheme.

This case study highlights how portal access, not just information availability, is a critical factor in the success of the Scheme. Without fair, timely, and user-friendly access to OEM systems, the Scheme cannot deliver its full benefits to independent repairers or Australian consumers.

Recommendation 3

Introduce a uniform standard for portal onboarding across all data providers, including:

- timely user verification and password reset processes
- functional support channels with clear escalation pathways
- defined service level agreements (SLAs) for registration and access issues
- mandate the availability of onboarding materials (e.g. videos, guides) for all independent users, with no unjustified access restrictions.

Empower AASRA with oversight authority to:

- monitor OEM portal performance
- track registration issues
- intervene in prolonged or systemic failures.

Publish key performance metrics (e.g. average registration time per OEM) to improve transparency and accountability.

Encourage the ACCC and Scheme Adviser to monitor activation timeframes as part of compliance checks, not just the availability of information once access is granted.

Q 7. Is the pricing of Scheme Information transparent and does it reflect fair market price?

The current provision under the Act requiring Scheme Offers to be provided to the Scheme Adviser (AASRA) is an important mechanism for ensuring pricing transparency. In general, this requirement supports clarity and accountability for the costs associated with accessing Scheme Information.

However, differences have been observed between the pricing listed on the AASRA portal and what is actually charged by some data providers. These discrepancies create confusion for repairers and RTOs, and undermine trust in the transparency framework.

To address this, data providers should be obligated to report any price changes or amendments to the Scheme Adviser within 30 minutes, ensuring that published pricing remains accurate and up to date.

With regard to whether pricing reflects a fair market price, we make no specific comment at this time. As noted earlier, the Act includes provisions that empower the regulator (ACCC) to assess and determine what constitutes fair and reasonable pricing, and this framework is considered adequate for that purpose.

Recommendation 4

Amend s57CA 7 (b) of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to specify that data providers must provide the Scheme Adviser with their updated Scheme Offer within 30 minutes of making any change to the Scheme Offer.

Q 8. In addition to the price of Scheme Information, what other costs, if any, impact the operation of the Scheme or compliance with it?

See VACC response to Question 16.

Q 9. If cost is a barrier to the effective operation of the Scheme, how may this be addressed? Where possible, quantify the anticipated financial benefits which may arise from identified approaches.

See VACC response to Question 16.

Information protection

Q 10. Do the existing definitions of safety and security information remain appropriate? If not, why?

VACC considers that the existing definitions of safety and security information under the Scheme remain appropriate and fit for purpose.

Q 11. Does the Scheme appropriately balance access to Scheme Information for Australian repairers and Scheme RTOs with the protection of safety and security information? If not, how might this balance be realised?

VACC considers that the Scheme broadly strikes an appropriate balance between providing access to Scheme Information for Australian repairers and RTOs, while protecting sensitive safety and security-related data.

Bundling safety/security information with Scheme Information

The Act provides that the data provider must separate safety and security information from other unrestricted Scheme Information to the extent that it is reasonably practicable to do so. However, VACC is aware that some data providers have struggled to separate safety and/or security information from other types of Scheme Information. As a result, certain providers have over-restricted access by applying security protocols or denial of access across entire datasets, even when the information is not safety- or security-related.

This overly cautious approach has created unnecessary barriers for independent repairers, delaying access to routine service and repair data that should be readily available under the Scheme.

As the Act has now been in effect for three years, VACC considers that data providers have been allowed sufficient time to adjust their data sharing systems, and recommends that they be required to segregate all safety and security information from Scheme Information.

Gaps in safeguards for safety/security information

In addition, there are known loopholes currently being exploited, particularly by some locksmiths, who are bypassing the Scheme's security protocols to gain access to key coding information. This not only creates an unfair advantage over legitimate repairers, who follow the proper access pathways, but also undermines the integrity of the Scheme and the security of customers' vehicles.

This issue highlights the need for stronger oversight and enforcement by the Scheme regulator to:

- ensure that only properly vetted and authorised individuals or businesses access security-sensitive information
- prevent circumvention of the Scheme's intent through third-party or unauthorised market access routes.

Recommendation 5

Amend s57DA of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to require that data providers separate all safety and security information from general service and repair data.

Q 12. Does the availability or accessibility of training impact the operation of the Scheme? If so, how?

Currently, training materials are not considered "Scheme Information" under the Act, which represents a missed opportunity, as the availability and accessibility of training has a significant impact on the effective operation of the Scheme.

VACC submits that training content offers critical value to both repairers and data providers, and its inclusion would greatly enhance the utility and accessibility of the information being shared.

Training plays a vital role by:

- providing up-to-date guidance on new technologies and vehicle models
- offering practical instruction on how to navigate OEM portals, which vary significantly across data providers
- supporting safe and accurate execution of complex repairs, including software updates and Pass-Thru programming
- helping ensure that repairers use shared data correctly and efficiently, reducing the risk of misinterpretation or misuse.

Without structured training materials and Pass-Thru programming, repairers, especially smaller workshops and new entrants, face a steep learning curve that can limit the full value of the Scheme and create inefficiencies in vehicle service and repair.

Recommendation 6

Amend the *Competition and Consumer (Motor Vehicle Service and Repair Information Sharing Scheme) Rules 2021* to prescribe that Scheme Information includes all relevant and up to date training materials, including technical guidance and portal navigation tutorials.

Q 13. Do practical difficulties exist in separating safety and/or security information from other Scheme Information? If so, what are these difficulties?

VACC has no comment.

Q 14. How might the challenges, if any, presented by the separation of safety and/or security information from other Scheme Information be addressed?

VACC has no comment.

Competition and consumer impacts

Q 15. Has the Scheme impacted independent repairers' ability to competitively diagnose, repair, service, modify or dismantle Scheme vehicles? If possible, quantify this impact and/or provide illustrative examples.

Survey responses from VACC members clearly indicate that the Scheme has had a positive and significant impact on independent repairers' ability to diagnose, service, and repair Scheme vehicles.

In particular, access to diagnostic tools, service procedures, and programming capabilities, once restricted to dealership networks, has enabled independent workshops to compete more effectively in a rapidly evolving automotive landscape.

However, despite the clear benefits, the Scheme's full potential is not yet being realised across the industry. A significant proportion of independent repairers remain unaware of the Scheme, its purpose, and how to access Scheme Information via the AASRA portal or OEM platforms.

This gap in awareness is undermining broader industry impact and uptake.

Recommendation 7

A targeted national awareness campaign is recommended to promote the Scheme, particularly among smaller and regional workshops. This could include:

- AASRA developing and distributing clear, user-friendly guidance materials to assist repairers in navigating access pathways and available tools.
- AASRA and the ACCC collaborating with industry associations and training providers to integrate MVIS access knowledge into ongoing professional development.
- AASRA developing technical guidance and training support to help independent repairers and RTOs build competency in emerging areas like software-based diagnostics, programming, and EV system integration.

Q 16. What barriers remain in enabling independent repairers to compete effectively in the market for vehicle repair, service, modification or dismantling? If possible, quantify the impact and/or provide illustrative examples of these barriers and indicate how they may be addressed.

While the Scheme has certainly delivered benefits to independent repairers, allowing them to compete more effectively and on fairer terms, one key remaining barrier to effective competition in the service and repair market is the lack of consistency in the nature and form of Scheme Information made available by data providers through their portals.

VACC is aware of many reports from repairers concerned that OEM platforms vary widely in design, structure, use of terminology, navigability, and functionality. Some OEM portals are overly complex, difficult to navigate, or poorly translated, requiring significant time and effort to learn, which creates a significant burden for repairers, especially those representing smaller workshops without dedicated IT support.

Illustrative examples and impacts

- A repairer may spend upwards of one hour just locating a wiring diagram or reset procedure on a new portal they haven't used before, delaying the repair and affecting workshop productivity.
- Some OEMs require multiple logins, additional paid subscriptions, or complicated verification processes that are not clearly explained, leading to frustration and abandonment of tasks that should be routine.
- The lack of a common interface or standard undermines productivity and reduces confidence, especially for generalist workshops servicing multiple brands.

This inconsistency not only reduces the efficiency of repairs but may discourage repairers from using the platforms altogether, which undermines the intent of the Scheme to promote open and fair competition.

VACC recommends requiring OEMs to provide Scheme Information in a standardised form, allowing repairers to access technical information in real time, without the need to access specialised OEM tools. This would be in line with the 2022 Massachusetts Right to Repair law.

By reducing the variability and complexity in how repair information is accessed, the Scheme would significantly improve productivity, confidence, and competitiveness among independent repairers, particularly in rural and generalist operations that service a wide range of vehicle makes.

Pass-Thru Information

Pass-Thru information is a process whereby a device is used in conjunction with a computer to reprogram or update software on a vehicle. Most manufacturers have this as a requirement in their service schedules.

Since the introduction of the Scheme, some OEMs have been providing access to Pass-Thru programming, enabling independent repairers to:

- update and reprogram ECUs
- perform software-based repairs
- reinitialise components after replacement
- restore full system function after servicing safety-critical systems (e.g., ADAS, EV drivetrains).

This access has reduced repair turnaround times, improved consumer confidence in independent workshops, and minimised costs and inconvenience for repair customers requiring software-related fixes. However, not all data providers offer Pass-Thru programming access, which limits the effectiveness of the Scheme across brands and repair scenarios.

By including Pass-Thru access for all data providers, the Scheme can ensure fair, consistent, and future-ready repair capabilities across the sector, delivering real value to consumers, repairers, and the broader industry.

Recommendation 8

Amend the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to require that all data providers offer Pass-Thru programming capabilities and procedures through the Scheme framework, where supported by the vehicle architecture.

Recommendation 9

Amend Section 57BA of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to introduce a standardised format or interface guidelines for service information portals, including:

- logical menu structures
- search functions by VIN, keyword, or fault code – for example, identification of vehicle variants through VIN search
- consistent labelling of common repair categories (e.g. brakes, driveline, ADAS, etc.)
- access to portal usage guides or video tutorials
- a library listing the Scheme Information available immediately for each vehicle, as well as the information not readily available along with the relevant justification
- onboarding documentation or training for their platforms under the Scheme, especially where systems are known to be complex.

Recommendation 10

AASRA should be funded to administer an Australian-wide "access hub" or aggregator tool that simplifies entry into multiple OEM portals through a central interface, in consultation with industry.

Q 17. Has the Scheme impacted outcomes for independent repairers' customers? If possible, quantify this impact and/or provide illustrative examples.

The Scheme has had a notable positive impact on outcomes for customers of independent repairers.

By enabling access to OEM service and repair information, the Scheme has improved the efficiency of repairs and overall convenience for consumers; repair customers no longer need to return to an authorised service centre for repairs involving software updates, module resets, or complex diagnostics as independent workshops can now complete these services in-house.

Q 18. Has access to service and repair information under the Scheme supported delivery of effective and relevant training courses? If possible, quantify this impact and/or provide illustrative examples.

VACC, through its industry engagement and the development of educational resources, understands that access to service and repair information under the Scheme has positively supported the creation of relevant and effective training materials.

In particular, the availability of accurate and brand-specific technical information has:

- improved the quality and specificity of learning materials, especially in areas such as electric vehicle (EV) systems, high-voltage safety protocols, and software-based diagnostics
- enabled trainers and industry bodies to deliver content aligned with current vehicle technologies and repair practices
- supported the development of real-world case studies and troubleshooting guides based on authentic OEM procedures.

Illustrative Example: EV guide

VACC has developed educational content on high-voltage system safety and EV diagnostics, directly informed by access to OEM repair information. These materials are used by training institutions and workshops to enhance technical understanding and ensure that students and apprentices are learning skills relevant to today's vehicle technologies.

Q 19. What barriers remain for Scheme RTOs in delivering effective and relevant training courses? If possible, quantify the impact and/or provide illustrative examples of these barriers and indicate how they may be addressed.

VACC has no comment.

Q 20. How has the Scheme impacted outcomes for students?

See VACC response to Question 18.

Q 21. What has been the commercial impact of the Scheme for dealers and preferred repairers? If possible, quantify this impact and/or provide illustrative examples.

Q 22. Has the Scheme affected the dealer or preferred repairer business models or approaches to aftersales servicing?

Q 23. What impact, if any, has the Scheme had for customers of dealers and preferred repairers? If possible, quantify this impact and/or provide illustrative examples.

Car dealers operate within an extremely competitive and saturated business environment, and this has impacted adversely on the profitability and viability of many dealerships over recent years. The cost of complying with a myriad of Federal and State-based legislation targeting the automotive industry also continues to impact on the day-to-day business operations of Victorian dealers.

To remain competitive, car dealers are required to make a significant ongoing investment into their operations, including maintaining facilities, vehicle stock levels, diagnostic tools and equipment, and investing in the ongoing training of qualified repair technicians. This investment is critical to ensuring that repair work is undertaken to the high safety and quality standards expected by consumers, and the broader community.

VACC members maintain that any information that is being accessed under the Scheme must be accurate and up-to-date, and that all repairers seeking to access Scheme Information be subject to a strict compliance framework, which includes ongoing training to ensure they have necessary skills to undertake repairs to appropriate safety and quality standards. VACC members also recommend further enforcement of the Australian Consumer Law to hold all repairers to equivalent standards.

Finally, VACC members urge the Australian Government to consult with OEMs and franchised dealership before legislating further obligations under the Scheme, or through other regulatory frameworks impacting the automotive industry.

Recommendation 11

That the Australian Government consult with OEMs and franchised dealership before legislating further obligations under the Scheme, or through other regulatory frameworks impacting the automotive industry.

Q 24. How has the Scheme impacted consumers' ability to choose their preferred repairer and experience in the repair of Scheme vehicles? If possible, quantify this impact and/or provide illustrative examples.

VACC has no comment.

Q 25. What barriers, if any, remain in enabling consumers to exercise choice amongst Australian repairers? How might these barriers be addressed?

The VACC considers that the most significant barrier to consumer choice of repairer is the restricted scope of what is considered a "Scheme Vehicle". VACC recommends expanding the scope of the Scheme under Section 57BA of the *Competition and Consumer Act 2010* to include motorcycles, heavy vehicles, farm machinery, and recreational vehicles. This recommendation is based on member feedback and operational challenges faced by independent repairers across these sectors.

Independent repairers in these sectors often encounter difficulties accessing essential service and repair information, leading to delays and increased costs for consumers. The lack of access hampers timely diagnostics and repairs, affecting service quality and customer satisfaction.

The absence of standardised access to repair information can lead to inconsistent maintenance practices, potentially compromising vehicle safety and compliance with regulatory standards. Ensuring all vehicle types are covered by the Scheme would promote uniform safety standards across the industry.

Including motorcycles, heavy vehicles, farm machinery, and recreational vehicles in the Scheme would level the playing field in the markets for the repair of these vehicle categories, fostering fair competition and greater consumer choice.

Recommendation 12

Amend Section 57BA of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to include motorcycles, heavy vehicles, farm machinery, and recreational vehicles within the Scheme.

Q 26. What impact, if any, has the Scheme had on Australian repairers' business offerings and pricing? If possible, quantify this impact and/or provide illustrative examples.

VACC is not aware of direct evidence that the Scheme has had a significant or notable impact on the pricing structures or service offerings of Australian repairers.

In most cases, independent repairers who utilise OEM service and repair information may apply a modest fee to cover access costs, such as portal subscriptions or pay-per-use charges. However, this is typically absorbed as part of a broader diagnostic or repair fee and has not resulted in noticeable price inflation for consumers.

While some workshops have expanded their technical capability (e.g. offering software updates or advanced diagnostics using OEM tools), these developments are seen more as enhancements to service quality than as direct commercial changes attributable to the Scheme.

Dispute resolution

Q 27. Describe the nature and outcomes of any disputes experienced in connection with the Scheme? How, if at all, were these disputes resolved?

VACC is not aware of any major or formal disputes between independent repairers and data providers under the MVIS framework to date. This could suggest one of two possibilities:

- the Scheme is functioning effectively, and issues are being resolved informally or with minimal intervention, indicating general compliance and cooperation; or
- repairers are encountering barriers, such as a lack of awareness, procedural complexity, or frustration, that deter them from initiating a formal dispute, even when justified.

VACC understands that AASRA is supported by a team of only 2 staff members, and urges the Australian Government to ensure AASRA is appropriately resources to fulfil its legislated functions.

Recommendation 13

The Australian government should ensure that AASRA is appropriately resourced to assist with dispute resolution where informal processes fail, and direct AASRA to publish anonymised summaries of common access issues and resolutions, to guide industry and increase transparency.

Q 28. Is the Scheme's dispute resolution framework effective in facilitating the resolution of disputes in relation to the operation of the Scheme? What, if anything, might be done to increase the effectiveness of this framework?

In VACC's view, the dispute resolution framework outlined in the Act is adequate in principle, providing a clear process for escalating and resolving issues between data providers and Scheme participants.

In most instances where access issues or technical problems have arisen, either the OEM's technical support or AASRA has provided adequate assistance to resolve the matter informally and in a timely manner.

Some repairers have reported:

- long delays in receiving responses from OEMs or third-party help desks
- difficulty identifying the appropriate escalation pathway when an issue is not resolved at the first point of contact
- uncertainty about their rights or the role of the Scheme Adviser in dispute intervention.

Case Study 2: Ongoing Delays and Systemic Failures in OEM Portal Registration

This case study involves an independent repairer attempting to gain access to a major European OEM's portal to service a client's vehicle. The process, which began in January 2024, remained unresolved as of March 2025, despite meeting the required training criteria, completing multiple registration attempts, and escalating the issue to both the OEM and the Scheme Adviser.

Timeline of Events:

- **January 2024**: Repairer registers for portal access but the application is rejected for missing documentation.
- **March 2024**: OEM confirms that the required training course satisfies their access criteria. The repairer reapplies with the training certificate.
- **January 2025**: Despite the re-submission, the repairer still has no access and receives no confirmation or assistance.
- **February–March 2025**: **After** escalating to AASRA, the repairer is informed the OEM is reviewing the issue. The repairer receives vague communication from the OEM indicating that a proposal has been sent, but if not accepted, the ticket may be closed without resolution.
- After accepting the proposal (without clarity on what was being accepted), the issue remains unresolved. The repairer expresses frustration and indicates they may open another support ticket in English, highlighting language barriers and lack of clarity.
- **31 March 2025**: The repairer still cannot log in. A screenshot confirms login failure. The repairer states: "This is really not acceptable for my customer. Could you please solve the problem ASAP?"

Key Issues Identified:

- **Excessive Delays**: the registration process has taken well over 12 months, preventing access to critical repair data and tools.
- **Breakdown in Communication**: OEM communication is slow, unclear, and at times contradictory. Critical instructions (e.g. for proposal acceptance) are vague, and the implications of actions (such as declining a proposal) are not explained.
- **Administrative Burden**: the process involved multiple application submissions, repeated document uploads, and unclear portal instructions, significantly increasing the repairer's workload.
- **Customer Impact**: The inability to access the OEM's platform directly impacted service delivery to a paying customer. Delays in repairing the vehicle not only affected the workshop's reputation and revenue but also inconvenienced the consumer.
- **Inadequate Support Channels**: Even with AASRA's involvement, no meaningful resolution was achieved in a timely manner. The OEM's use of centralised overseas support created further delays and language-related confusion.

This case demonstrates that the availability of information alone is insufficient if the process to access it is prohibitively complex. The lack of performance standards for portal registration risks undermining the MVIS framework. Delays such as these directly contradict the Scheme's goal of supporting fair and timely competition in the service and repair market.

This case also highlights a serious breakdown in the Scheme's practical implementation. The repairer fulfilled all obligations, completed training, and followed OEM and Scheme processes. Yet over a year later, they were still denied access, to the detriment of their business and their customer.

Recommendation 14

AASRA should develop simple guidance material outlining the dispute resolution process to make the process more transparent and easier to engage with. This should include:

- when and how to escalate a complaint
- what information to provide
- expected timeframes for resolution.

AASRA should also provide guidelines on transparency and communication protocols to ensure that repairers receive updates throughout the resolution process, not just at closure.

Q 29. Are the Scheme Adviser's functions in connection with dispute resolution, including those relating to reporting, appropriate in supporting the resolution of disputes?

The Scheme Adviser (AASRA) has appropriate mechanisms in place to support dispute resolution, particularly through the Missing Information Report system, which allows repairers to raise concerns regarding inaccessible or incomplete data.

Since the inception of the Scheme, the functionality and responsiveness of the MIR process have significantly improved, indicating a positive trajectory in how the Scheme Adviser fulfils its obligations. However, feedback from VACC members suggests that:

- the timeliness of responses and resolutions remains a concern in some cases
- follow-up communication or updates are occasionally lacking, leaving repairers uncertain about the status of their submission
- increasing volume and complexity of requests may be straining AASRA's current capacity.

Recommendation 15

The Australian government should provide additional support or resourcing to AASRA to ensure timely and consistent handling of Missing Information Reports and other dispute-related functions. This funding should be tied to the publication of performance benchmarks or service standards for MIR response and resolution timeframes.

Other issues

Q 30. Are the Scheme Adviser's functions in connection with dispute resolution, including those relating to reporting, appropriate in supporting the resolution of disputes?

There are significant ongoing international developments that Australia should consider when reviewing and potentially expanding the scope and application of the Scheme outlined below.

U.S. REPAIR Act (Right to Equitable and Professional Auto Industry Repair Act)

This proposed U.S. legislation mandates that vehicle manufacturers must provide vehicle owners, and their designees, real-time access to in-vehicle data related to diagnostics, service, wear, and calibration via a standardised, secure access platform.

Key provisions include:

- prohibiting OEMs from impairing access to diagnostic and repair data
- mandating data access that enables aftermarket compatibility
- restricting OEMs from forcing consumers to use proprietary tools, parts, or services outside of recall or warranty repairs.

The REPAIR Act recognises the growing importance of telematics and vehicle-generated data and seeks to ensure consumer choice and market fairness in an increasingly digitised repair environment.

Global Vehicle Right to Repair Position Statement

This statement outlines the global automotive aftermarket's unified position on the need for legislative action to ensure fair competition and data access in the age of connected vehicles.

Key points:

- independent repairers play a critical role in maintaining the global vehicle fleet, particularly in rural and remote regions
- connected vehicles generate and transmit large volumes of diagnostic data exclusively to OEMs, creating a significant barrier to independent service providers
- voluntary agreements have proven ineffective due to power imbalances and lack of enforcement
- a clear legislative framework is needed to ensure:
    - equal access to repair information and digital services
    - consumer freedom of choice
    - safety and cybersecurity standards are upheld
    - effective enforcement mechanisms are in place.

The statement also outlines ten core principles that should underpin Right to Repair laws, including transparency, competitive neutrality, and technological neutrality.

Full document available**:** Global Vehicle Right to Repair Position Statement.

Q 31. What other issues not raised in this discussion paper relating to the Scheme should be considered as part of the Review?

Access to parts

One of the most pressing barriers impacting consumers' ability to exercise meaningful choice among Australian repairers is the availability and timely supply of replacement parts, a challenge affecting both independent repairers and authorised dealers, particularly in the collision repair sector. This issue was highlighted in the ACCC's 2017 New Car Retailing Industry Market Study.

VACC considers that the Scheme's exclusion of mandatory access to parts is increasingly acting as a barrier to effective competition in the repair market, and to the broader objectives of the Scheme.

Industry feedback indicates that new market entrants are particularly problematic, with reports of wait times stretching into several months for access to essential vehicle components. This delay limits a consumer's ability to:

- choose their preferred repairer (if that repairer cannot source parts in a reasonable time)
- have repairs completed in a timely manner
- maintain confidence in the broader repair market, especially for emerging vehicle brands.

These delays result in extended vehicle off-road times, increased costs (e.g. hire car or lost work), and consumer frustration, regardless of the repairer's technical capability.

VACC agrees with the ACCC's 2017 position that OEM parts and accessories should be generally available to independent repairers on commercially fair and reasonable terms and supports an expansion of the Scheme framework to ensure OEMs provide equitable access to parts to all repairers.

Recommendation 16

The Scheme should be expanded to cover both access to service and repair information, as well as access to any and all associated parts required to repair a Scheme vehicle, on commercially fair and reasonable terms.

Access to Security-Related Parts under Scheme Protocols

Access to security-related vehicle components, such as keys, immobiliser modules, ECUs, and door locks, is currently restricted by various OEM-specific policies. For example, a major European OEM applies a Theft-Related Parts (TRP) policy, which limits access to these parts based on strict verification processes and security checks.

While there is merit in the intent of such policies to prevent criminal misuse, there is currently no consistent or centralised framework under the Scheme to govern secure access pathways for legitimate repairers. This has led to uncertainty, delays, and a competitive disadvantage for independent repairers, particularly those undertaking legitimate repairs following theft or crash damage.

These components should be brought within the scope of the Scheme under the existing security protocols of the Act, specifically those outlined under Sections 57DD and 57DE, which deal with

access to security information and the accreditation of applicants through a "fit and proper person" test.

Expanding the Scheme to allow independent repairers to access security-related parts would ensure secure, auditable, and equitable pathways for access to security related parts, improve turnaround times for legitimate repairers, and strengthen both the integrity of the Scheme and the security of consumers' vehicles.

Recommendation 17

Expand the application of the Scheme's security protocols to include access to security-related parts (not just repair information), such as those governed under OEM TRP policies, by developing a uniform national process for verifying legitimate access to security related parts to be administered by AASRA.

Electronic parts catalogues

Access to electronic parts catalogues is critical for independent repairers to reference the correct OEM parts in turn enabling them to service vehicles accurately, efficiently, and competitively.

EPCs allow repairers to:

- look up parts using VIN-specific information, ensuring compatibility
- visualise exploded diagrams to identify all required components for a specific repair
- avoid incorrect parts ordering and return delays, which are costly for both workshops and customers.

This reduces repair time, increases first-time fix rate, and improves customer satisfaction and avoids delays from trial-and-error parts ordering, and the risk of fitting incorrect or incompatible parts. An issue exacerbated particularly with ADAS systems due to parts being tied to VIN specific part batched and software versions.

Some OEMs already make parts catalogues available through their portals. Having a uniform standard in the Scheme would be beneficial to all parties including dealers who see this as a genuine revenue source for their business.

In Europe, the EU Type Approval Regulation (2018/858) mandates OEMs to provide independent operators with access to EPCs and related technical data. Australia's Motor Vehicle Service and Repair Information Sharing Scheme provides a legal framework for sharing repair and service information, but access to EPCs is not mandatory.

Recommendation 18

Include electronic parts catalogues within the meaning of Scheme Information s57BD of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021.*

Compliance with Section 57DD(2): Storage of Sensitive Information

There are serious concerns that some data providers operating under the Scheme are requesting personal information from repairers, including names, residential addresses, qualifications, and in some cases criminal history, and subsequently storing this data on centralised databases located outside of Australia.

Under Section 57DD (2) of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021*, this practice is inconsistent with the legislative requirement that sensitive personal information must be stored within Australia or an external Territory.

This issue raises significant cybersecurity and privacy risks, particularly considering the growing number of global data breaches. Independent repairers have a right to expect that their personal and professional information is stored securely and in compliance with Australian law.

Recommendation 19

Amend s57CA(5) of the *Competition and Consumer Amendment (Motor Vehicle Service and Repair Information Sharing Scheme) Act 2021* to specify that a data provider's terms and conditions must include information regarding the data provider's process for storing sensitive information, including safeguards to ensure this information is not stored on servers outside of Australia.

VACC

You're in good hands

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