AUSTRALIAN AUTOMOTIVE
AFTERMARKET ASSOCIATION

Australian Automotive Aftermarket Association (AAAA)

AAAA Response to the Consultation on the Motor Vehicle Service and Repair Information Sharing Scheme

August 2025

PREFACE

AAAA welcomes the opportunity to contribute to the consultation on the Motor Vehicle Service and Repair Information Sharing Scheme. As the peak body for the Australian Automotive Aftermarket, we cannot stress enough how important this scheme has been in assisting consumers and aftermarket repairers since its implementation. It has transformed the ability of independent repairers to compete on a fair and level playing field, ensuring consumers have a choice of repairer.

As an industry, we are very proud of what this law has achieved for our industry, as legislation that is rightly seen as a world-leading example of a right-to-repair law. However, no law is perfect, and this was never going to be a "set and forget" situation.

The great thing about our law is that it is designed in a way that allows for amendments to ensure its application is best practice.

Since its introduction, we have had enough time to analyse the real-world application of the law. Although feedback on the scheme has been overwhelmingly positive, and thousands of workshops are now accessing full OEM repair information, many via the AASRA Portal, there are a few areas that need to be amended and tightened to ensure all workshops can fully leverage the benefits of the law and ensure that consumers continue to have a choice.

The number one challenge workshops are finding with the new law is the lack of uniformity in obtaining information from the various OEM portals and the lack of access to use a universal pass-through interface, such as J2534, for diagnostic software or programming files.

The current design of the MVIS suits repairers who specialise in one brand or a family of similar brands. As it stands, if you are an all-makes-and-models workshop, you have to subscribe to and access more than 60 different car company information portals. Learning how to navigate each unique OEM portal can be time-consuming, and managing multiple ad-hoc short-term subscription purchases can be burdensome.

The AASRA Portal, which allows a single credential to log in to more than 30 OEM portals, has simplified this process for subscribers. However, it does not address the challenges and expense of having to purchase specific diagnostic hardware for every brand.

Because each car manufacturer has its own proprietary tooling for connecting and downloading updates to their vehicles, this requires small workshops to purchase or rent these specific scan tools, which are prohibitively expensive.

These issues are not insignificant, but nor are they difficult to rectify. In many cases, AAAA believes that these changes can be made through amendments to the Scheme Rules, avoiding the need to amend the legislation through parliament.

We stand ready to work with Treasury and other stakeholders to future proof this legislation for the benefit of all Australian vehicle owners.

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Executive Summary

The MVIS has largely upheld the original intent of fostering an environment that supports consumer choice, fair and open competition, and improved productivity in the automotive sector. The summary below outlines key achievements of the scheme, its impact on consumers and independent repairers, and the remaining barriers that continue to limit consumers' ability to exercise full choice.

1. The Law, As It Stands, Is Working for Some

The establishment of AASRA & Dedicated Portal with some OEM buy-in –Operational Arm of the MVIS is in principle facilitating the promotion of consumer choice

AASRA has provided the gateway for repairers to access manufacturer service and repair data and has grown sustainably with thousands of subscribers since its inception. 31 OEMs are now registered with the AASRA, these brands account for more than 90 per cent of the national car parc, ensuring that many motorists can have their vehicles repaired by a workshop of their choice. A further 19 lower-volume marques have lodged scheme offers that meet minimum standards. Together,

AASRA also runs a helpdesk and "missing information" reporting system to assist in resolving any gaps by liaising with manufacturers. This highlights that the core framework of the law is operational, and for those workshops that have invested in using it, it is delivering real benefits.

Learning and continuous improvement

All parties recognise that a reform of this scale requires ongoing fine-tuning. AASRA has a culture of continuous improvement, welcoming feedback from users to address access issues and refine the process. AASRA has developed step-by-step guides for navigating various manufacturer portals and has addressed initial launch issues to improve the user experience. This has helped the scheme become more robust over time and allows for quick fine-tuning if issues arise.

2. It Is Making a Real and Meaningful Impact.

Critical trends research that was commissioned by AAAA and undertaken by Fifth Quadrant highlights the real and meaningful impact that the law is having on both workshops and consumers.

- Fewer consumers are being turned away.

  Prior to the MVIS being introduced, workshops on average were turning away 20 vehicles per month. Since the introduction of the MVIS, this number has dropped to 12, showing a 40% drop in vehicles being turned away.[1]

- Consumer Outcomes

  Workshops have cited that since the introduction of the MVIS, there have been major positive impacts on their relationships with customers. 68% of workshops stated that the increased access to detailed vehicle information has resulted in customer satisfaction, and 66% of workshops stated that access has resulted in increased customer convenience.[2]

- Increased Productivity and Economic Benefit

  65% of workshops have also stated that the introduction of the MVIS has assisted in reducing wasted time for technicians and increased productivity. This has resulted in 59% of workshops saying that their workshop has increased revenue as a direct result of the access to repair information.[3]

1 *Fifth Quadrant – MVIS Market Research Benefits of Using MVIS, P. 17*
2 *Fifth Quadrant – MVIS Market Research Benefits of Using MVIS, P. 16*
3 *Fifth Quadrant – MVIS Market Research Benefits of Using MVIS' P. 14 & 15*

Executive Summary

3. However, there are issues that are obstructing the law's original intention.

While the legislation/scheme is working for some workshops that have had the capital and infrastructure to invest in the scheme. There are several key issues that are actively impacting on the schemes' current overall effectiveness. These issues were raised during the initial legislative debate, and while we do not let the search for perfection get in the way of progress, the impacts of these decisions are being felt across the board. The flow-on impact of these issues discussed below is restricting consumer choice, which is at odds with the original intent of the legislation.

Proprietary Scan Tools Creating Exclusionary and Restrictive Market Conditions to Access the Scheme.

The AAAA believes that the continued use of proprietary scan tools poses a significant and immediate challenge. If left unresolved, this issue risks entrenching a two-tiered system in how the AASRA portal is accessed and used. As noted in our response to the discussion questions, the AAAA advocated from the outset for the inclusion of a universal pass-through standard in the legislation and scheme rules.

Now that the scheme is operational, it is clear that this gap must be urgently addressed to prevent further anti-competitive behaviour by OEMs. Independent workshops should be able to access the scheme and carry out service and repair work using tools that are both effective and reasonably priced.

Currently, workshops are being charged up to $510 per day to access brand-specific scan tools. For businesses that service all makes and models, these costs can multiply quickly across multiple OEM platforms. This pricing model is placing an unsustainable burden on many workshops—particularly small businesses—who cannot absorb the cost and are reluctant to pass it on to customers.

Visibility of Enforcement

Although the dedicated ACCC unit has improved oversight, visibility and transparency of enforcement actions remain insufficient. Greater transparency regarding compliance with outcomes and punitive measures would enhance industry accountability and consumer confidence. Publicly accessible records of compliance breaches and enforcement actions would substantially boost deterrent effects and compliance rates.

Telematics data is not included in the scheme.

Telematics data remains excluded from the current scheme — a gap that is already affecting workshops today and will become increasingly urgent in the immediate future. Although often seen as a future-facing issue, telematics is already having a real-world impact, particularly in relation to ADAS-equipped vehicles. Advanced Driver Assistance Systems (ADAS) are now present in approximately 20% of the Australian car parc parc, and this figure is projected to rise sharply by 2030 to 43% of the car parc.[4]

ADAS calibration requires both static and dynamic testing, with the dynamic phase conducted while the vehicle is in motion. Once the vehicle is moving, the legislation excludes diagnostic information from the scheme, classifying it as telematics and therefore outside the scope of mandatory data sharing. This means that independent repairers may be unable to access critical real-time data needed to verify sensor alignment, system functionality, and calibration accuracy during dynamic testing — undermining both vehicle safety and service integrity.

Data Aggregators

The law's implementation has also revealed challenges in how repair information is provided to third-party data aggregators and in the way electric vehicle (EV) data is handled. Many workshops, especially multi-brand workshops, rely on aggregator platforms.

AAAA has long campaigned for a requirement that car makers share all repair and service data (including local repair times, service schedules, service bulletin updates and recall information) with licensed data aggregators in a timely, standardised format.

Making this an obligation would ensure that even smaller workshops, which often use aggregate tools for efficiency and cost, can get the full information needed to service and repair any vehicle.

4 *ADAS Industry Code of Conduct - https://www.aaaa.com.au/industry-advocacy/new-national-code-launched-to-guide-adas-calibrationin-automotive-repair/*

AAAA Responses to Treasury's Discussion Questions

Information provision

1.1 Does the scheme apply appropriately to the information needed for Australian repairers to diagnose faults, service, repair, modify or dismantle scheme vehicles?

The Scheme, as it operates today, does enable independent repairers to diagnose faults, service, repair, modify, or dismantle scheme vehicles to a base level. However, the AAAA has identified several critical issues in how access to that data is practically delivered — particularly in the use of third-party scan tools, pass-through technology, and data aggregators. While the legislative intent was to create fair and competitive access, the current implementation has introduced technical and commercial barriers that limit effective participation in the scheme for many independent workshops.

- **Data Aggregators and Third-Party Platforms**

  Data aggregators are the first preference for many small and regional workshops as they offer information efficiently and securely to thousands of workshops. These intermediaries make manufacturer data usable and accessible.

  In AAAA research shows that up to 87% of workshops rely on data aggregators to access affordable data.[5]

  Under the current model, for many data aggregators, contracts are negotiated by teams in Europe & the United States. While some data aggregators still get access to information in Australia, it is not of the same quality and is not adapted for the local market, even though OEM Dealers have timely and full access to this local information.

  Currently, manufacturers are not required to provide local technical service bulletins, repair procedures, service schedules, or warranty and recall information to data aggregators. In contrast, manufacturers in the United States and Europe are required to license this information. Independent repairers are losing vital time searching for information that should be readily available, as it is for customers in Europe.

  This exclusion from the scheme makes it harder for workshops to manage multiple subscriptions in-house and can make it extremely costly and inefficient for workshops that work on all makes and models.

- **Universal Pass Through Standard (J2534)**

  Since the introduction of the MVIS technology has advanced. Independent repairers often have to purchase multiple brand-specific diagnostic tools, which are costly and inefficient. While hiring these tools is an option, there are lengthy delays which cause a loss in productivity.

  Independent repairers currently need to subscribe to over 60 different car brand portals, each with its own unique process and costly brand-specific tools.

  Some diagnostic tools charge excessive daily fees (up to $510 per day). Models for universal pass-through already exist, such as the SAE-J2534 standard.

The exclusion of a universal pass-through standard and the lack of formal recognition for data aggregators are significant structural barriers. These omissions prevent the scheme from fully delivering on its promise to support fair competition, reduce costs, and maximise productivity across the Australian economy.

5 *Fifth Quadrant – MVIS Market Research 'MVIS Channels Accessed' p.18*

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's exclusion of telematics data, digital logbooks, and detailed Original Equipment Manufacturer (OEM) parts information significantly limits independent repairers' capabilities. This exclusion results in delayed repairs, increased consumer costs, and reduces independent repairers' ability to compete fairly against OEM Dealerships. The practical impact is an uneven playing field, disadvantaging independent repairers and restricting consumer choice.

Lack of Online Service History/Online Logbook Service Updates

During the last decade, we have witnessed a shift in digitisation. This has also impacted the way that we record previous service and repair history for vehicles.

While this has traditionally been an issue for consumers who left their logbook at home, with some manufacturers now not providing a physical logbook, access to digital logbooks is vital for consumers to ensure they have a valid vehicle service history.

This issue also makes it difficult to verify warranty claims, track maintenance schedules, or diagnose recurring issues.

Online service history and the ability to amend these documents when a car has been serviced already exist within OEM/Dealer networks.

Without intervention, there is a risk that manufacturers will use this as a tool to force consumers back into dealership networks.

Access to Telematics Data

Telematics is defined in the legislation as data automatically generated and transmitted by a scheme vehicle, while it is being driven, regarding driver or vehicle performance.

Advanced Driver Assistance Systems (ADAS) are now fitted to almost every new vehicle sold in Australia. These systems play a critical role in improving road safety — but only if they are calibrated accurately. Inaccurate calibration can result in malfunctioning systems, posing a significant safety risk to both drivers and the broader public.

Proper ADAS calibration requires both static and dynamic testing, with the dynamic phase conducted while the vehicle is in motion. This phase is essential for verifying sensor alignment and system functionality in real-world conditions. However, the current legislation does not clearly address access to diagnostic data during vehicle operation. In an attempt to exclude telematics from the scope of the law, the legislation has inadvertently created a grey area — one that fails to recognise how much vehicle technology has advanced.

When the scheme was drafted, dynamic ADAS calibration was not a widespread requirement. Today, it is essential. But because the law has not kept pace, independent repairers could be left without access to the real-time data needed to confirm the safe operation of critical systems such as lane-keeping assist, adaptive cruise control, and autonomous emergency braking. This gap in the legislation undermines the safety intent of the scheme and highlights the urgent need for reform.

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?

In most cases, yes. However, as the law operates now, scan tool manufacturers and distributors must ensure that they sell the tools to a 'fit and proper person'.

This requirement is set for all 'data providers' in the legislation; currently, scan tool manufacturers fall into this category.

However, scan tool manufacturers sell these products to a registered business, not individuals involved in the scheme. For someone to access data through the AASRA portal, they must be a fit and proper person, but there is no equivalent mechanism for businesses.

This is causing confusion on the level of obligation placed on the scan tool manufacturer to ensure that the qualified tech is a fit and proper person.

AAAA believes that there is a relatively simple fix to this confusion and that the following guidance should be given.

The ACCC issues guidance on 'fit and proper person' that may include:

1. A scan tool operator has taken reasonable steps to ensure that the primary user of the scan tool is a fit and proper person.
2. A declaration from the business that the person using the scan tool is a 'fit and proper person'. To be provided to the distributor/ supplier within 30 business days from the point of sale.
3. ACCC to issue formal guidelines for scan tool manufacturers on how they interpret the law as it stands and what obligations the scan tool manufacturers and businesses that sell them have to ensure those using the tools are a fit and proper person.

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?

Yes, AAAA does believes that different types of data providers should have different obligations, particularly differentiating OEM data providers from scan tool manufacturers and data aggregators. Currently, all these providers fall under the broad definition of 'data providers', creating unnecessary complexity and confusion. Data aggregators, for example, negotiate the terms of use with the OEM to then provide a streamlined, standardised approach to accessing vehicle repair data from multiple OEMs, significantly benefiting independent repairers by simplifying their access to essential information.

AAAA recommends scheme rules amendments and clear ACCC guidance explicitly defining categories of data providers (OEMs, scan tool manufacturers, and data aggregators) and specifying distinct obligations for each. For scan tool manufacturers, clearer guidelines around verifying fit and proper persons, as outlined in the previous response, would enhance compliance and operational clarity. For data aggregators, simplified and tailored compliance measures would reduce regulatory burdens and encourage efficient information dissemination.

Distinguishing these roles within the scheme will enhance the scheme's productivity, compliance clarity, and competitive fairness.

5. Is the scheme information made available by data providers subject to reasonable terms?

Under the Scheme there is a requirement for data providers to make scheme information available in the same form /method as authorised repairers however we are seeing a number of instances, specifically relating to diagnostic tooling, where data providers are refusing to sell their proprietary diagnostic tools to independent repairers and instead providing an inferior option which puts independent repairers at a competitive disadvantage. Examples include;

- A data provider that only allows independent repairers to lease their proprietary tool for short periods of time, takes days or sometimes weeks to ship the tool to the repairer and requires a large upfront bond payment.
- Another data provider that will only sell independent repairers a VCI device rather than their proprietary tool. The repairer is then required to book a time for a technician from the data provider to log in remotely and undertake the programming task for a fee. This process can often take 1 – 2 weeks to complete.
- A third data provider only offers independent repairers access to a 'virtual tester' which has significantly reduced functionality, is slow, fault-prone, plagued and often crashes during diagnostic tasks, which can damage key vehicle components such as the engine control unit, which cost thousands of dollars to replace.

6. Do the requirements concerning timeframes for the provision of scheme information remain appropriate?

In addition to the above examples, the scheme requires that data providers make scheme information available to independent repairers in the same timeframe as their authorised repairers however we are aware of a number of data providers that have introduced an approval process for an independent repairer to undertake a programming task which can often take an additional 24 hours to gain approval. We do not believe the same process is in place for authorised dealers.

Another problematic area is the process for a locksmith or independent repairer to obtain a security code from a data provider to re-code keys to a vehicle in the case when the vehicle owner has lost all sets of keys. Despite the fact that there is an automated process available, the majority of data providers still issue these codes manually, meaning that there are normally significant time delays (of days and sometimes weeks) between the code request and receipt, which is not practicable when the car owner is locked out of their vehicle.

7&8. Is the pricing of scheme information transparent, and does it reflect a fair market price? & In addition to the price of scheme information, what other costs, if any, impact the operation of the scheme or compliance with it?

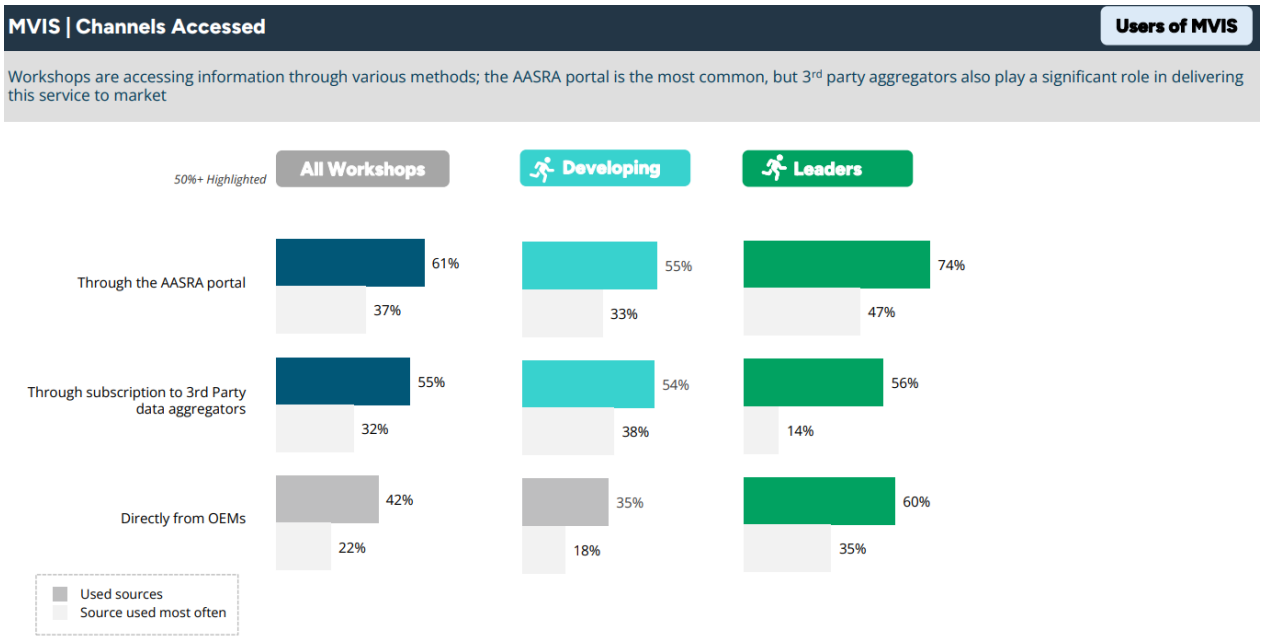
For the information itself, pricing remains transparent and reflects the fair market price.

While our research shows that a significant number of scheme participants would like to see the price lower, we believe that this comes down to two main faults with the current scheme.

1. Use of Data Aggregators

With over 80% of workshops relying on data aggregators to access affordable data, the current restrictions in place mean that workshops are having to go to a number of different sources to obtain necessary data.[6]

Our most recent AAAA Research highlights that 55% of workshops are currently using multiple sources of data to complete their regular services and repairs, as seen in Table 1 below.



Since 2018, the EU has required that independent repairers receive full access to repair and diagnostic data, including telematics, under Regulation 2018/858.

The Massachusetts law requires that all 2022 and newer vehicles with telematics systems include an open-access data platform that enables real-time mechanical data sharing. This is accessed via a secure, standardised interface, allowing independent repair shops to diagnose and repair vehicles without relying on dealership-only tools.

AAAA believes that this model would make the scheme pricing fairer for all users.

2. J2534

Currently, independent repairers have to purchase multiple brand-specific diagnostic tools, which are costly and inefficient. While hiring these tools is an option, there are lengthy delays which cause a loss in productivity.

AAAA firmly believes that independent workshops should be able to purchase tools that enable them to access the scheme and complete service, and repair work should be available at a reasonable price.

Independent repairers currently need to subscribe to over 60 different car brand portals, each with its own unique process and costly brand-specific tools.

Some diagnostic tools charge excessive daily fees (up to $510 per day), making it almost impossible for independent repairers to afford.[7]

This creates a scheme where the initial cost of the data is relatively affordable but not transparent, as workshops have to rent/buy third-party proprietary tools in order to complete jobs.

6. *Fifth Quadrant – MVIS Market Research 'MVIS Channels Accessed' p.18*
7. *https://aasra.com.au/?page_id=2945&utm_source*

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.

The primary financial barrier within the current scheme is the substantial expense associated with proprietary diagnostic equipment and diverse subscription costs across different manufacturers.

To effectively address this, AAAA proposes adopting a standardised, universally compatible diagnostic tool protocol (SAE-J2534 or equivalent). The financial benefits of implementing this universal standard are substantial, potentially reducing diagnostic equipment costs by thousands of dollars each year for independent repairers. Additionally, recognising data aggregators as legitimate and central information distributors could further reduce the complexity and expense of accessing critical repair data.

AAAA estimates that these combined measures will result in significant cost savings, improve market competitiveness, and provide direct consumer benefits through lower vehicle servicing costs.

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

While the availability of training does not fundamentally prevent the operation of the scheme, it does influence the extent to which the scheme is effectively utilised — particularly by small and independent workshops.

There are two key areas where training could enhance the scheme's impact. The first is education and support for using the scheme itself — including what the law provides, how the AASRA portal works, and how to access OEM information. Results from AAAA's industry survey indicate that there is more room for industry associations, AASRA, and other stakeholders to provide targeted training to help technicians navigate and apply the scheme in practice. This kind of training is especially important for smaller businesses that may not have in-house compliance or IT support.

The second opportunity lies with OEMs, many of whom could offer clearer onboarding or online training for how to use their individual technical portals. Each OEM platform differs in structure, pricing, navigation, and terminology, and more consistent, accessible training from manufacturers would help reduce friction and improve the user experience for repairers trying to do the right thing.

In summary, while training is not a barrier to participation per se, improving the availability and quality of training — from AASRA, industry associations, and OEMs — would significantly support the scheme's broader adoption and effectiveness.

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

Safety Credential Requirements – AURETH101 Compliance

Rather than approaching this question solely in terms of whether safety and security information can be separated from other scheme data, it is more valuable to examine how the scheme's safety provisions are functioning in practice—particularly the requirement that EV service and repair information cannot be provided to independent technicians unless they have completed the nationally recognised unit of competency **AURETH101 – Depower and Reinitialise Battery Electric Vehicles**, or an equivalent qualification.

This requirement has caused several practical issues. Some OEMs are unable to differentiate between EV, hybrid, and internal combustion engine (ICE) variants of the same make and model. As a result, technicians are required to complete AURETH101 simply to access information about ICE vehicles—a clearly inefficient and unnecessary use of time and resources.

That said, many AAAA members support credentialling where it is appropriate, especially when it relates to technician safety. There is strong support for sensible, proportionate barriers to entry. In this context, the uptake of AURETH101 across the independent sector is a positive development. It reflects the professionalism of the industry and provides an affordable entry point into EV-related competencies.

While AAAA maintains that this requirement represents legislative overreach—given that technician safety credentialling is more appropriately handled under state-based workplace health and safety laws—we also recognise the unintended benefits. The requirement has encouraged more technicians to build EV readiness without forcing them into costly or overly complex qualifications.

In summary, while the AURETH101 requirement may not be strictly necessary under the scheme, we do not strongly oppose it. It may not be perfect, but it has supported workforce development and safer handling of high-voltage vehicles in the aftermarket.

AAAA supports the separation of genuine security information from other categories of scheme data and recognises the importance of maintaining strict protocols in this area. We support the current approach, which limits access to security-related information—such as key codes and immobiliser data—to authorised **Vehicle Security Professionals (VSPs)** who have undergone appropriate vetting and approval processes. This regime strikes an appropriate balance between public safety and industry access. We believe the existing framework for VSPs is working well and should remain in place to ensure that sensitive security information is accessed only by trusted and qualified individuals.

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

The difficulty arises not from the presence of safety and security controls, but from how they are used in practice—often as a mechanism to restrict legitimate access to otherwise routine repair information.

We have observed instances where large OEMs are unable or unwilling to separate safety or security information from general service data. In some cases, entire data sets are withheld unless the repairer satisfies additional requirements, such as 'fit and proper person' checks. This turns basic repair information into a gated category, creating unintended chokepoints and frustrating the scheme's original purpose.

Access to such information is frequently subject to manual approval by the OEM. Even when a repairer has met all eligibility criteria, delays persist.

Under the current scheme, OEMs have up to **two business days** to release safety- or security-related data (after credential verification) and **up to five days** if the data has never been supplied before. For workshops operating on same-day or next-day job cycles, even these lawful delays strand vehicles on hoists and reduce consumer choice.

Furthermore, OEMs have little incentive to improve response times and there is minimal enforcement when they exceed the allowed timeframes.

While we support appropriate safety checks and credentialling, the current framework as it is practiced by some OEMs, introduces unnecessary delays for time-sensitive repair work. We encourage Treasury to explore mechanisms to streamline access while maintaining safety standards—ensuring that the scheme works as intended and does not become a barrier to efficient, timely service delivery.

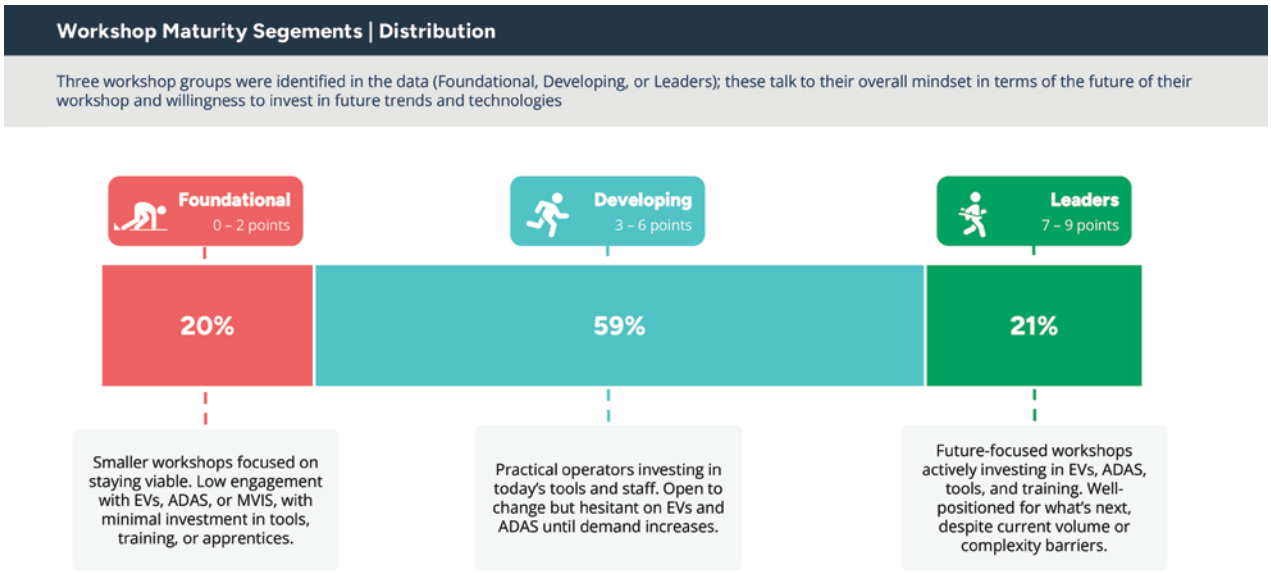
Competition and consumer impacts

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.

Since the scheme has been introduced, it has narrowed the information gap between OEM Dealer networks and independent workshops. While there is still work to be done to make them on par with the information they can access, the scheme has allowed independent repairers to deliver competitive and OEM equivalent services for many vehicles on Australian Roads.

To quantify this, the AAAA engaged fifth quadrant to carry out research on independent repairers' sentiment around the MVIS.

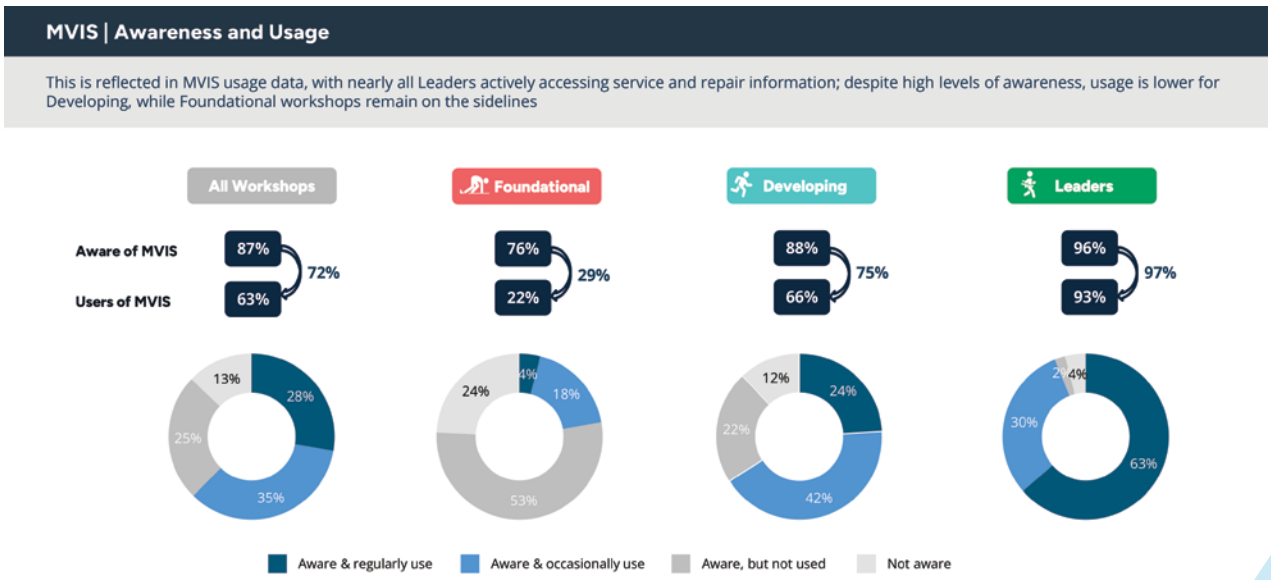
To break down this data, workshops were split into 3 categories, as seen below.



Broader Adoption Leading to increased benefits

From AAAA's research, 87% of independent workshops are now aware of the MVIS, with 63% using it occasionally or frequently.

The table below illustrates the breakdown between the 3 categories, showing that leaders in the space are using the MVIS more frequently.



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. *Continued*

Enhanced Diagnostic Accuracy and Productivity

Access to comprehensive fault codes and repair methodology has reduced wasted technician time on diagnostics, 65 % of users report a decrease in wasted technician hours, enabling workshops to manage higher throughput and reduce per-vehicle labour costs.[8]

Reduction in Lost Business

Prior to MVIS, independent workshops routinely turned away approximately 20 vehicles per month due to diagnostic limitations. Post-implementation, this figure has fallen by roughly 40 % (down to 12 vehicles), directly recapturing engagements that would previously have been directed to OEM dealers.[9]

Healthy Competition Conditions Leading to Increased Revenue

The two points above have created better conditions for independent repairers to operate. Among the workshops actively using MVIS data, 61 % report increased revenue and 55 % report higher profitability. Leader workshops exceed these averages (67 % revenue uplift, 61 % profitability uplift), demonstrating that information access directly underpins stronger competitive positioning and return on investment.[10]

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 MVIS has delivered substantial gains, several structural and operational barriers remain. Addressing these will be critical to ensuring all independents, particularly smaller "Foundational" workshops, can fully leverage the scheme.

Incomplete Data

Over 60% of MVIS users report gaps in the data provided, such as missing telematics feeds or calibration parameters for advanced driver-assistance systems (ADAS). These omissions force workshops to rely on costly workarounds or limit the scope of services they can offer.[11]

High Diagnostic Tool Costs

The necessity to maintain multiple OEM-specific diagnostic interfaces imposes a significant capital burden on smaller workshops, with 62 % identifying tool acquisition and subscription fees as cost-prohibitive. Without a universal passthrough standard, independents face uneven investment requirements that hinder service offers, slowing productivity and restricting competition.[12]

Shift from Awareness of the Scheme to Education on how to use the AASRA Portal.

Among independent workshops that are not currently using the scheme, 46 % find registration procedures overly complex. This indicates the current targeted outreach approach should change from awareness to education, particularly to workshops without dedicated tech personnel.[13]

AASRA Digital Interface

Over 60% of users cite navigational difficulties and slow portal performance when accessing OEM websites via MVIS. This not only wastes technician time but also undermines operational flow, increasing administrative overhead and potentially eroding customer confidence during lengthy information retrieval processes.[14]

To address these barriers the AAAA recommends

1. The adoption of SAEJ2534 or an equivalent open protocol, reducing reliance on multiple proprietary tools and lowering capital barriers, especially for smaller operators.
2. Amend scheme obligations to require OEMs to supply full telematics streams and ADAS calibration data, ensuring end-to-end service and repair ability.
3. Targeted education and support for workshops to onboard into the AASRA Portal, combining online modules and regional workshops to bridge technical gaps among smaller workshops.

8 Fifth Quadrant – MVIS Market Research 'Productivity Outcomes' p.15
9 Fifth Quadrant – MVIS Market Research 'Effectiveness of MVIS Information Source' p.17
10 Fifth Quadrant – MVIS Market Research 'Business Outcomes' p.15
11 Fifth Quadrant – MVIS Market Research 'Opportunities for MVIS to Enhance Workshop Operations' p.21
12 Fifth Quadrant – MVIS Market Research 'Opportunities for MVIS to Enhance Workshop Operations' p.21
13 Fifth Quadrant – MVIS Market Research 'Benefits of Using MVIS' p.23
14 Fifth Quadrant – MVIS Market Research 'Opportunities for MVIS to Enhance Workshop Operations' p.21

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

The ultimate test of MVIS's success lies in the end-customer experience. Enhanced workshop capabilities create more transparent and productive services for consumers.

Increased Customer Satisfaction

Over half (56%) of MVIS-using workshops report a positive impact on customer satisfaction, attributing this to access to detailed vehicle information.[15]

Improved Service Convenience

A notable 66% of users listed enhanced customer convenience in their work, driven by reduced vehicle downtime and streamlined service workflows, which supports stronger customer retention and positive word-of-mouth referrals.[16]

Expansion of Consumer Choice

Among non-users, 62% believe that MVIS access would enable them to introduce expanded service offerings to include a wider range of vehicles. While this may be limited at the moment with cost restrictive barriers including the current lack of a universal pass-through standard the positive sentiment that the MVIS will increase these services for independent repairers will lead to greater service offerings for consumers.[17]

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.

The scheme has had a positive impact on consumers ability to choose who services and repairs their vehicle.

The legislation has enabled more independent workshops to complete complex work in-house and by improving customer experience metrics. In research undertaken by fifth quadrant workshops have reported 66% improvements in customer satisfaction and a 79% increase customer convenience amongst MVIS users, indicating shorter cycle times, fewer hand-offs, and better repair outcomes felt directly by motorists.

The legislation has also reduced vehicles turned away, prior to the MVIS workshops on average were turning away 20 vehicles per month, since the introduction of the MVIS, this number has dropped to 12 showing a 40% drop in vehicles being turned away. This shows that more makes and models can now be serviced locally without referral back to the dealer, providing a clear benefit for consumers.[18]

15 Fifth Quadrant – MVIS Market Research 'Customer Outcomes' p.16
16 Fifth Quadrant – MVIS Market Research 'Customer Outcomes' p.16
17 Fifth Quadrant – MVIS Market Research 'Benefits of Using MVIS' p.23
18 Fifth Quadrant – MVIS Market Research 'Benefits of Using MVIS' P. 17

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

Several small barriers remain for consumers seeking genuine choice among Australian repairers. The primary barrier is the continued OEM restriction on critical data, including real-time telematics data and digital logbooks. On top of this the requirement for independent repairers to use proprietary OEM scan tools adds additional and unnecessary costs for consumers, this is also seen with the exclusion of data aggregators.

While these may seem like large issues for the scheme to deal with AAAA believes that there are simple and practical fixes to these that will increase productivity, increase choice for consumers and lower costs. These solutions include:

Online Service History

a) All manufacturers must provide unrestricted access to service history data for independent repairers through the AASRA portal.

b) Manufacturers must not impose fees, licensing conditions, or contractual limitations that hinder workshop access to service records.

c) Manufacturers must allow logbook service validation to be recorded.

Universal Scan Tools

Massachusetts - Right to Repair Bill -Chapter 93K, Section 2(d)(1).

(d) (1) Beginning in model year 2018, except as provided in subsection (e), manufacturers of motor vehicles sold in the commonwealth, including heavy duty vehicles that are not heavy duty vehicles built to custom specifications sold in the commonwealth for commercial purposes, shall provide access to their onboard diagnostic and repair information system, as required under this section, using an off-the-shelf personal computer with sufficient memory, processor speed, connectivity and other capabilities as specified by the vehicle manufacturer and: (i) a non-proprietary vehicle interface device that complies with the Society of Automotive Engineers standard J2534, Society of Automotive Engineers J1939, commonly referred to as SAE J2534 and SAE J1939, the International Organization for Standardization standard 22900, commonly referred to as ISO 22900 or any successor to SAE J2534, SAE J1939 or ISO 22900 as may be accepted or published by the Society of Automotive Engineers or the International Organization for Standardization; (ii) an onboard diagnostic and repair information system integrated and entirely self-contained within the vehicle, including, but not limited to, service information systems integrated into an onboard display; or (iii) a system that provides direct access to onboard diagnostic and repair information through a non-proprietary vehicle interface, such as ethernet, universal serial bus or digital versatile disc. Each manufacturer shall provide access to the same onboard diagnostic and repair information available to their dealers, including technical updates to such onboard systems, through such non-proprietary interfaces as referenced in this paragraph. Nothing in this chapter shall be construed to require a dealer to use a non-proprietary vehicle interface specified in this paragraph, nor shall this chapter be construed to prohibit a manufacturer from developing a proprietary vehicle diagnostic and reprogramming device; provided, however, that: (i) the manufacturer also complies with this paragraph; and (ii) the manufacturer also makes this device available to independent repair facilities upon fair and reasonable terms and otherwise complies with subsection (a).

Proposed Australian Change

Access to Service and Repair Information via Non-Proprietary Tools

1. Non-Proprietary Tool Access: Data Providers must ensure that all diagnostic, service, and repair information made available to authorised dealers is equally available to independent repairers. This information must be accessible without requiring the use of any proprietary diagnostic tools or interfaces.
2. Pass-Through Tool Compatibility: Data Providers shall provide independent repairers with access to the vehicle's on-board diagnostic systems using a pass-through device that complies with the Society of Automotive Engineers (SAE) J2534 standard or any updated equivalent standard. This ensures compatibility with non-proprietary tools used for diagnostics, reprogramming, and repair purposes.
3. Fair and Reasonable Terms: The access to diagnostic information, technical updates, and tools must be provided on fair and reasonable terms to independent repairers and vehicle owners, ensuring no restrictions that would hinder independent vehicle servicing and repairs.

Data Aggregators (3 potential solutions)

1) Minister to request ACCC Review into Data Aggregator's in other markets including the United States & Europe and for the ACCC to report back in 12 months with recommendations on regulations to be enacted

2) Good faith dealings for fixed period
Clause Y: Good Faith in Dealings with Third-Party Data Aggregators

    1. Good Faith Obligations: Data Providers are required to engage in good faith negotiations and dealings with third-party data aggregators. This obligation includes the timely provision of diagnostic, service, and repair information necessary to support independent repair services and vehicle maintenance.

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

2. Fair Access to Information: Data Providers must ensure that third-party data aggregators, who compile and distribute vehicle diagnostic and repair information, have equitable access to the same information provided to authorised dealers. Such access must be granted on fair, transparent, and non-discriminatory terms.
3. Prohibition of Unreasonable Restrictions: No Data Provider shall impose unreasonable restrictions, conditions, or delays on third-party data aggregators, which could limit or prevent the proper dissemination of service and repair information to independent repairers.
4. These terms will be in place for a period of 18 months from commencement. At the sunset of this period if the Minister believes that no reasonable progress has been made the above measure will be ratified.

3) Immediate change and enforcement
MVIS (Data Aggregator Fair Use Clause)

1. Manufacturer Obligations
   a) All vehicle manufacturers supplying vehicles to the Australian market must provide non-discriminatory access to all technical service bulletins, repair data, and essential repair procedures to accredited third-party data aggregators.
   b) This access must be provided in a machine-readable format and aligned with industry standards to ensure usability across multiple platforms.
   c) Manufacturers must not impose unreasonable fees, delays, or restrictive licensing terms that hinder access to this data by independent repairers and data aggregators.
   d) Manufacturers cannot impose technological, or software-based restrictions (geofencing, paywalls, encryption measures) that may limit aggregator access.
2. Fair and Transparent Data Access
   b) Data aggregators must be permitted to compile and distribute repair information without restriction, provided they comply with security and privacy safeguards established by the Australian Competition and Consumer Commission (ACCC).
   c) Manufacturers found to be withholding, restricting, or manipulating access to essential repair data may be subject to penalties under the Competition and Consumer Act 2010.
3. Enforcement and Compliance
   a) AASRA will oversee compliance, with powers to refer and fast track complaints to the ACCC.
   b) When complaints are made, AASRA will open a 30-day resolution window with the complainant and manufacturer to resolve the issue. At the end of the 30-day period, AASRA will automatically refer the matter to the ACCC.

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.

The introduction of the scheme has significantly improved independent repairers' ability to broaden their business offerings by enabling more consistent access to essential service and repair information. This access has allowed workshops to take on a wider range of diagnostics and repairs, improving their competitiveness and giving consumers more choice and convenience.

However, several structural issues within the law continue to limit the scheme's full potential. Independent repairers are still required to navigate multiple OEM platforms, purchase brand-specific diagnostic tools, and maintain a growing number of costly subscriptions. These requirements are embedded in the way the law permits OEMs to deliver data, effectively allowing a fragmented and commercially burdensome model to persist.

These challenges have a direct impact on business operations and pricing. For workshops that service all makes and models, the cumulative cost of access can be significant affecting profitability and, in some cases, being passed on to consumers. These are not merely teething problems or matters of education; they reflect deeper flaws in the scheme's design that must be addressed to ensure fair access and long-term sustainability.

Dispute resolution

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

AAAA defers to AASRA as the formal dispute resolution body under the scheme and acknowledges that AASRA is best placed to provide a comprehensive response to this question.

However, we reiterate our long-standing concern that the scheme's dispute resolution framework was built on unrealistic expectations about the likelihood of Alternative Dispute Resolution (ADR) between small independent workshops and large global car manufacturers. The assumption that an individual workshop would engage in mediation with a global OEM was never practical or realistic and, as predicted, it has not occurred.

The nature of the problem is not about individual disputes between workshops and OEMs. Rather, it is about systemic non-compliance or restrictive practices built into OEM systems that affect the entire independent repair sector. OEMs do not typically respond differently to individual workshops, they treat all non-authorised businesses the same. As such, the appropriate dispute mechanism should not be workshop-led mediation, but a more robust process where AASRA identifies patterns of non-compliance and escalates those issues directly to the ACCC for investigation and enforcement.

Other issues

30. Are there international developments in relation to motor vehicle right to repair to which Australia should have particular regard when considering the application of the scheme?

Yes - unquestionably. AAAA has consistently maintained that the issue of access to motor vehicle service and repair information is a global challenge. The strategies used by car manufacturers to restrict access are not unique to Australia, they are coordinated international practices aimed at locking consumers into authorised networks and capturing the full lifecycle of vehicle ownership. These restrictions are implemented in similar ways across jurisdictions and are typically justified using the same recurring themes: safety, cybersecurity, and quality assurance.

AAAA is part of a global Right to Repair community and actively collaborates with international counterparts to share intelligence, track legal and regulatory reforms, and identify emerging best practices. There is much for Australia to learn from other markets that are further advanced in regulating data access and vehicle repair rights — particularly in the United States, the European Union, Canada, and South Africa.

- **In the United States**, the proposed **REPAIR Act** would mandate equal access to in-vehicle data and prohibit the use of telematics to bypass repair rights. At the state level, **Massachusetts** and **Maine** have passed strong Right to Repair laws requiring data and telematics access for independent repairers.
- **The European Union** is implementing a comprehensive framework through the **EU Data Act**, which will establish legal rights for third parties — including repairers — to access data generated by connected devices, including vehicles. This will directly challenge current OEM practices around proprietary access.
- **In Quebec**, Canada has enacted Right to Repair legislation that explicitly supports access to repair data and tools, reinforcing consumer choice and supporting independent workshop viability.
- **In South Africa**, the Competition Commission has introduced binding guidelines that prohibit OEMs from locking out independent repairers and parts suppliers. These reforms mandate open access to technical information and tools and ban anti-competitive tying of warranties to authorised servicing.

These international examples represent a clear policy shift toward protecting consumer choice, fostering open competition, and enabling a sustainable repair economy. Australia must keep pace with these global developments or risk falling behind.

Given the breadth and importance of this issue, AAAA will provide supplementary advice outlining these international reforms in greater detail. We also offer to facilitate direct dialogue between Treasury and our overseas partners, ensuring Australia benefits from the most up-to-date global intelligence and policy solutions.

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

One issue not addressed in the discussion paper but consistently raised by independent repairers — is access to parts.

We acknowledge that the current scheme is focused on access to service and repair information. However, in practice, repair information is only useful if the parts required to complete the repair are also available. Increasingly, we are hearing from workshops and parts suppliers about growing concerns around parts availability including OEMs not making certain components available to the independent aftermarket, delays in supply, or parts being restricted to authorised dealerships only.

While Treasury may consider this issue to be outside the current legislative framework, we note that the consumer's experience of repair involves both information and parts. From the repairer's perspective, the distinction between data and parts is largely academic - if the repair can't be completed, the customer doesn't benefit from the scheme.

Given the scale of concern we are hearing, AAAA believes it would be prudent to include parts availability in the broader review of Right to Repair in the automotive sector. At the very least, this issue should be acknowledged as an emerging risk to the effectiveness of the scheme.

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