MTAA RESPONSE TO:

Review of the Motor Vehicle Service and Repair Information Sharing Scheme

Discussion paper

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MOTOR TRADES ASSOCIATION OF AUSTRALIA

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Executive Summary

The Motor Trades Association of Australia (MTAA) welcomes the review of the Motor Vehicle Service and Repair Information Sharing Scheme (the Scheme). We appreciate the opportunity to contribute to this important consultation and look forward to working collaboratively with all stakeholders to improve the Scheme's impact and accessibility for its users.

MTAA is the national peak body representing the interests of Australia's automotive retail industry. Through our affiliated state and territory associations, MTAA represents thousands of businesses across the country, including independent mechanical and body repairers, dealerships, auto recyclers, service stations, and other automotive service providers. The organisation plays a central role in advocating for fair and sustainable policy outcomes, promoting skills development and training, and ensuring the industry remains competitive, innovative, and responsive to the needs of consumers.

From the outset, it is our view that while the Scheme has delivered benefits in several areas, its overall effectiveness is limited by inadequate promotion, inconsistent participation from Original Equipment Manufacturers (OEMs), and weak enforcement mechanisms. These limitations are underlined by data showing there are only 3,000 AASRA repair subscribers, a small proportion of the industry.

Furthermore, industry recognition of AASRA remains low. We also believe the ACCC should be taking a more proactive role in addressing OEM behaviour, particularly where access is restricted, subscription models are inflexible, or essential repair information is obscured under EV or security-related classifications.

This submission responds to the questions raised in the *Review of the Motor Vehicle Service and Repair Information Sharing Scheme Discussion Paper*. It draws on insights from MTAA members, broader industry consultation, and survey responses from 87 repair businesses across Australia. The survey was developed and conducted by the Victorian Automotive Chamber of Commerce (VACC).

Survey responses form the foundation of this submission and were received from a cross-section of the independent repair sector, including general automotive workshops, automotive electricians, collision repairers, specialist service providers and auto recyclers and dismantlers.

The survey results provide a snapshot of industry sentiment and reveal significant variation in how the Scheme is being experienced. For example, when asked whether the Scheme had delivered benefits to their business, 51 per cent of respondents said yes, while 49 per cent said no. This reflects the uneven experience of participants and points to the need for system-wide improvements.

Notably, 41 per cent of respondents reported they had never used the Scheme, with several indicating they were unaware it existed. Among those who had accessed it, 84 per cent reported business benefits, suggesting that awareness and engagement are key drivers of its value.

Cost and access were also identified as common barriers. Half of all respondents raised concerns about subscription fees or pricing structures, particularly among small and independent workshops. Many provided detailed written feedback explaining how current fee models limit their ability to participate.

Together, these findings highlight the need for targeted improvements to awareness, affordability, and the consistency of user experience. To support this, we have outlined several recommendations aimed at ensuring the Scheme delivers consistent, fair, and practical outcomes across the sector.

Effectiveness in providing information

The Scheme represents a significant step forward in supporting independent repairers' access to essential service and repair information. Since its introduction, many workshops have reported meaningful improvements, including easier access to service schedules and diagnostics, more consistent availability of digital records and programming functions, and the convenience of a single-entry point across multiple manufacturers. These are important developments that MTAA and its members strongly advocated for in securing a nationally consistent right to access vehicle data.

However, despite these gains, there is room for improvement. Some repairers continue to encounter incomplete or delayed information, platform usability varies between OEMs, and technicians frequently report difficulties navigating systems to retrieve critical repair data. These issues affect workshop efficiency and highlight the need for continued refinement of the Scheme to ensure it delivers on its full potential.

Barriers to safety and security information

Current processes for accessing safety and security information are unclear and inconsistently applied. Technicians regularly encounter delays or rejections when requesting security-related data, which in turn prevents repairs from proceeding.

The absence of standardised access pathways and eligibility criteria in relation to safety requirements has made it difficult for legitimate operators to obtain required information in a timely manner. This has a direct impact on service delivery and workshop viability.

Varying stakeholder benefit

The Scheme's impact across stakeholders has been mixed:

- **Independent repairers** face reduced competitiveness due to cost barriers, complex OEM systems and information gaps
- **RTOs** struggle to deliver relevant training without consistent access to current diagnostics, manuals and repair methods
- **Consumers** are affected by delays, repair referrals to dealerships and reduced local choice
- **Dealers and preferred repairers** retain a structural advantage through more integrated and consistent OEM access

Some respondents highlighted practical improvements in access for certain brands, but some noted that subscription fees, EV qualifications, police checks, and language barriers continue to create unnecessary obstacles.

Dispute resolution

Feedback suggests that repairers experience unresolved frustrations with OEM behaviour, including poor compliance, data gaps and access limitations. There is little evidence of successful issue resolution, indicating the dispute resolution framework is either not well known or not actively used.

To improve outcomes, MTAA believes that the ACCC should take a more proactive role in investigating complaints, enforcing obligations and ensuring greater accountability across the Scheme.

In summary, while the Scheme remains an important framework and the MTAA and its members strongly support its continuation, its operation must be improved to deliver its intended outcomes. MTAA recommends:

- Stronger enforcement by the ACCC to address potential OEM non-compliance
- Greater visibility and promotion of AASRA's role and services
- Improved consistency, transparency and affordability across OEM portals
- Standardised, practical pathways for accessing safety and security information
- Better support for training providers and small businesses through clear guidance and system improvements

Without these reforms, the Scheme risks reinforcing existing market imbalances and failing to meet the needs of repairers, trainers and consumers across the sector.

Finally, we note that MTAA would welcome the opportunity to work with The Treasury on developing and implementing improvements to the Scheme. Should you wish to discuss further or have any questions regarding this submission, please contact Rod Camm, MTAA Interim Executive Director on 0409 484 051 or rodc@mtaq.com.au.

MTAA response to discussion paper questions

Information provision

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

1.1 Australian repairers to diagnose faults, service, repair modify or dismantle Scheme vehicles, and

1.2 Scheme RTOs to provide training for diagnosing faults with, servicing, repairing, modifying or dismantling Scheme vehicles?

The Scheme aims to ensure Australian repairers can access the information needed to carry out vehicle servicing, diagnosis, repairs, modifications and dismantling. In practice, it does not consistently provide the full range of information required.

One respondent commented, "Any and all information that dealerships receive, or manufacturers have should be easily accessible," including "up-to-date service bulletins and engineering communication about faults or issues." While the Scheme does require access to service bulletins and service campaigns, many repairers report that this information is not consistently available in practice.

Engineering communications are excluded under the Scheme, which may contribute to confusion and the perception of restricted access. This highlights the need for clearer communication about what is covered under the Act and improved consistency in the provision of required information.

Repairers also stressed the need for clear and navigable documentation, including "detailed instructions, in a structured way that is easy for technicians to access." Access to comprehensive work instructions and diagnostic procedures was also raised as essential to ensure both repair quality and vehicle safety, with one comment stating, "This will allow the technician to do the job safely and ensure the vehicle is safe to return to service."

These issues collectively show that the Scheme still falls short of supporting the day-to-day needs of repairers and training providers in a reliable and practical way.

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 scope of information covered under the Scheme continues to present challenges that extend beyond general accessibility. Several respondents noted that some vehicle makes and models are not fully supported, with essential service and repair details either missing, inaccessible, or incomplete. One repairer commented,

"Not all of the information is available to us. Some makes and models are non-existent, and insurers are demanding we follow OEM procedures."

Specific examples included:

- Older Toyota models, where repairers struggled to access necessary service information
- A Nissan vehicle, where wiring diagrams could only be obtained through a dealership
- Jeep models, with one workshop reporting four vehicles on hold for over three weeks due to delayed security access
- Tesla, where attempts to retrieve security-related data were blocked due to authorisation errors
- Toyota's online portal, described as extremely slow and unable to load wiring diagrams
- Hyundai, where a two-week payment system outage left users without access to any repair information
- MG, which reportedly lacked critical depowering data for an EV
- Renault, identified as having one of the most difficult navigation interfaces
- Stellantis group brands, flagged as consistently problematic in terms of usability and access
- BMW and Mercedes took an extensive amount of time to gain access,

This feedback illustrates that even when the Scheme is technically in place, practical barriers continue to prevent technicians from accessing the information they need to perform safe, accurate, and timely repairs which contradicts the intent of the Act and needs to be addressed.

These issues reduce the reliability and efficiency of repair operations and highlight gaps in coverage that remain unresolved under the current Scheme settings.

Further, safety recalls are not included under the Scheme, leaving repairers without access to critical updates that directly affect vehicle safety and repair accuracy. To ensure these important materials are accessible across all makes and models, we recommend that safety recalls be explicitly included within the scope of the Scheme.

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?*

There is clear frustration among repairers about the level of compliance and responsiveness from some data providers. Several comments reflect concerns that not all manufacturers are meeting their obligations as intended under the Scheme. There are ongoing reports of poor communication, lack of timely responses to support tickets, and difficulties navigating manufacturer platforms.

Some repairers expressed the view that enforcement of data provider obligations is weak, with little visible follow-up when issues are raised. There is a perception that some manufacturers are only superficially participating in the Scheme, providing minimal access or designing platforms in ways that are not user-friendly. These issues reduce confidence in the Scheme's ability to deliver consistent and reliable access across all brands.

To address these concerns, we recommend that the ACCC take a more active enforcement role to ensure full compliance with the Scheme. This could include regular audits of manufacturer platforms, clearer reporting channels for repairers to raise access issues, and stronger penalties for non-compliance. Increased visibility of enforcement action would help build confidence among repairers and signal to all data providers that full and meaningful participation in the Scheme is not optional.

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?*

Feedback indicates that OEM platforms vary significantly in design and functionality, leading to inconsistencies in how repairers access information. As one respondent noted, more training is needed because "they are all different" systems. These variations can pose practical challenges for users, particularly smaller workshops without dedicated administrative or technical support.

However, this diversity in platform design must not be used to justify reduced compliance with the Scheme. Equal access remains an essential principle. Rather than softening obligations, consideration could be given to developing minimum usability standards to ensure that all platforms meet the intent of the Scheme.

5. *Is Scheme information made available by data providers subject to reasonable terms?*

While MTAA does not offer specific comments on the terms and conditions of data providers or their reasonableness, we believe that ongoing monitoring and regular industry feedback are essential. This will help ensure that pricing structures, access conditions, and delivery mechanisms remain fair, transparent, and do not create unintended barriers for independent repairers or RTOs.

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

While the Scheme currently allows data to be made available within five business days of its release to dealerships, we believe this timeframe is too long given the pace of modern servicing and the widespread use of online platforms.

We recommend the maximum access timeframe be reduced to 24 hours, except in exceptional circumstances such as system outages. Timely access is critical to ensuring repairs are completed efficiently and customers are not unnecessarily inconvenienced due to avoidable delays in accessing information.

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

The pricing of Scheme information is widely seen as unclear and inconsistent. Repairers expressed frustration that costs are often only revealed after payment or registration, and that the value of what is received does not always justify the price. Some noted that downloading required software is time-consuming and adds to the cost burden by disrupting productive work hours.

While the Act currently requires that data providers submit Scheme Offers to the Scheme Adviser (AASRA), which is an important step toward ensuring pricing transparency, inconsistencies have been reported. In some cases, the prices listed on the AASRA portal differ from what is actually charged by data providers, leading to confusion and eroding trust in the transparency framework.

Daily subscription charges were also a common concern, with significant price variation between manufacturers. Additional fees were sometimes incurred even when access was disrupted, creating further frustration. This lack of consistency and price visibility contributes to a broader perception that the current model disadvantages independent repairers and does not reflect a fair or functional market.

To address this, we recommend that data providers be required to report any price changes or amendments to AASRA in a timely manner to ensure pricing information remains current and accurate. As one respondent put it, "As a small business that doesn't require access to manufacture information often, sometimes only once a year. The costs can be prohibitive to accepting jobs." This highlights how the cumulative effect of Scheme-related costs can discourage smaller workshops from participating fully.

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

Beyond the subscription price of Scheme information, repairers face additional costs that affect both Scheme operation and compliance.

Repairers identified several indirect costs that affect their ability to operate efficiently under the Scheme. Time lost due to system outages or technical issues was frequently raised, with some platforms going offline during critical periods and delaying job completion. In other cases, platforms lacked guidance or navigation instructions, making it difficult to plan usage or determine the most cost-effective subscription period.

The time taken to locate and interpret required information was also noted as a burden, especially when systems were difficult to use or lacked clear labelling. These factors increase downtime and reduce workshop productivity, adding a layer of compliance cost that is not reflected in the listed price of access.

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.*

Cost remains a clear obstacle for many repairers who identified several ways the Scheme could be made more workable by addressing affordability concerns without compromising data availability.

A few contributors suggested that reducing access fees or introducing more affordable options would help address this issue, especially for independent repairers. Greater support or incentives for small businesses could ensure a more level playing field and improve compliance without discouraging participation. Making access easier and cheaper was seen as a practical step toward improving both the reach and effectiveness of the Scheme.

Information protection

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

The Act provides important protections for security-related information and outlines clear eligibility criteria for access, including the requirement to be a fit and proper person. These safeguards are essential and appropriate for maintaining safety and integrity within the sector. However, feedback from survey participants indicates that even those who may be eligible under the Scheme can face delays or uncertainty when attempting to access security-related data.

For example, one participant noted, "I try anything security-related and it says that I'm not [authorised]," while another described having multiple vehicles in their workshop awaiting security access information, delaying repairs. While it is not possible to verify whether all individuals making these comments meet the formal access criteria, these examples suggest that the process for gaining or verifying authorisation may not be working as efficiently as intended.

Although the current definitions of safety and security information remain appropriate, greater clarity and responsiveness in the authorisation and access process may be needed to ensure that eligible repairers can obtain the information they need in a timely and secure manner.

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?*

Concerns were raised about inconsistent and unclear access rules. Some professionals are granted access to key codes while others are excluded, undermining confidence in the fairness of the Scheme. Standardising approval processes, clarifying eligibility criteria, and providing practical guidance on how to meet safety-related requirements helps support fairer access while maintaining necessary protections.

Survey data highlights inconsistencies in preparedness and eligibility:

- When asked whether they or their staff had completed electric vehicle (EV) training to access safety information:
    - 51% responded yes
    - 49% responded no
- When asked whether they were registered security professionals with AASRA:
    - 54% responded yes
    - 46% responded no

This data suggests that a significant portion of the industry remains unable to access security-classified data under current settings. Improving awareness of AASRA's processes and providing more streamlined, equitable pathways to security authorisation may support more consistent access while maintaining appropriate safeguards.

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

Training availability has a direct impact on the Scheme's effectiveness. Comments highlighted the need for "more training on how to use individual OE websites as there are all different" and "improved training on usage of the system and the benefits of using it." These comments suggest that variation in platform design and complexity hinders consistent access to repair data.

In some cases, the only way to access required material is to use "an outdated and no longer supported browser," which raises questions about the practicality and sustainability of current delivery methods and the need for technical improvements and/or training.

Others noted that "training is needed to gain confidence so we know what we are doing," reinforcing that without adequate training, users may struggle to navigate systems or apply the information effectively. This issue is especially pronounced as technology evolves, with some referencing EV training certificates and specialised training needs.

Where training is limited or outdated, the potential benefits of the Scheme may not be fully realised, particularly for smaller workshops or new entrants unfamiliar with system requirements.

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

Difficulties in accessing security related information continue to affect workshop operations. Repairers described scenarios where vehicles sat idle due to unresolved access requests, while others stressed that some jobs require immediate authorisation that is not provided in time.

While many repairers appear to understand that certain information is classified as security-related and subject to specific access protocols, delays in processing, lack of transparency around status updates, or rigid platform designs continue to cause operational challenges.

While no survey responses specifically indicated that standard repair information is being withheld due to bundling with security-classified content, this possibility cannot be ruled out. MTAA acknowledges the potential concern and could investigate this issue more closely should there be interest.

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

Some repairers suggested that clearer separation of content within OEM portals could assist users in locating the correct information more efficiently. Repair details, safety procedures, and security elements are often bundled or poorly organised, making navigation time-consuming and prone to error. Streamlining how this data is categorised would help reduce confusion and allow technicians to access only what is relevant to their task.

Others indicated that practical improvements could include upfront visibility of what is included in specific access levels or subscriptions. Having clearer outlines of what each level contains before purchase or request could help avoid wasted time and unnecessary transactions.

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.*

MTAA strongly supports the continuation of the Scheme and recognise it as a vital step toward creating a more level playing field in the automotive repair industry. Since its introduction, the Scheme has helped raise awareness of the need for equitable access to manufacturer data and has established a legal foundation for repairers to request essential service and repair information.

While some challenges remain in terms of implementation and usability, the Scheme has delivered a net positive outcome for the sector. It has formalised the right to access technical data, encouraged greater OEM accountability, and provided a framework for resolving disputes where access is denied. Importantly, it has also helped reduce dependence on dealership networks for certain types of work, allowing more repairers to operate competitively and deliver services to customers more efficiently.

For example, under the Scheme, some OEMs now provide 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
- Minimised costs and inconvenience for customers who would otherwise need to return to the dealership for software-related fixes

However, despite these clear benefits, the Scheme's full potential is not yet being realised across the industry. A significant number of independent repairers remain unaware of the Scheme, its purpose, and how to access information via the AASRA portal or OEM platforms. Additionally, not all data providers currently offer pass-thru programming access, which limits the effectiveness of the Scheme across brands and repair scenarios.

By ensuring pass-thru programming is included across all data providers (where technically feasible) the Scheme can deliver fair, consistent, and future-ready repair capabilities across the sector, creating greater value for consumers, repairers, and the broader industry.

This gap in awareness and access is currently limiting the Scheme's broader industry impact and uptake.

To maximise the effectiveness and reach of the Scheme, MTAA recommends the following:

- Launch a targeted national awareness campaign to promote the Scheme, particularly among smaller and regional workshops.
- Develop and distribute clear, user-friendly guidance materials to help repairers understand access pathways and tools available.
- Collaborate with industry associations and training providers to integrate Scheme access knowledge into professional development.
- Mandate that all data providers offer pass-thru programming capabilities through the Scheme framework, where supported by the vehicle architecture.
- Provide technical guidance and training support to help independent repairers and RTOs build competency in emerging areas such as software-based diagnostics, programming, and EV system integration.

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.*

Repairers continue to face significant workflow and access barriers under the Scheme with these challenges separate from the availability or completeness of data. One technician explained they "had to take a vehicle to the dealership to get a wiring diagram released," highlighting how restricted access can directly undermine a workshop's ability to operate independently. These issues are particularly acute for smaller businesses, which often lack the administrative capacity or technical support to manage multiple systems and navigate complex platforms.

A key ongoing barrier is the lack of consistency in how OEMs deliver service and repair information through their portals. While the Scheme has made important strides in improving access, many repairers have reported that OEM platforms vary widely in design, structure, terminology, navigation, and functionality. Some are overly complex, poorly translated, or require repeated logins and unclear verification steps making routine tasks unnecessarily time-consuming, for instance:

- A repairer may spend upwards of an hour just locating a wiring diagram or reset procedure on an unfamiliar portal, delaying job completion and reducing workshop efficiency.
- Some OEMs require multiple logins, additional paid subscriptions, or hard-to-follow steps that are not clearly explained, leading repairers to abandon tasks that should be straightforward.
- The absence of a standardised interface or common format across platforms undermines productivity and confidence, especially in generalist workshops that service a wide range of vehicle brands.

This inconsistency not only affects the efficiency of repairs, but may also discourage participation in the Scheme altogether undermining its goal of promoting open and fair competition in the service and repair sector.

Other jurisdictions have recognised and addressed this issue:

- In the European Union, the Block Exemption Regulation requires technical information to be delivered in a standardised, accessible format.
- In the United States, the Massachusetts Right to Repair law mandates a secure, standardised, open-access platform for telematics and diagnostic data across all manufacturers.

To improve usability and support greater Scheme uptake, MTAA recommends the following:

1. Introduce standardised format or interface guidelines for OEM service information portals, including:
    - Logical and consistent menu structures
    - Search functions by VIN, keyword, or fault code
    - Standard labelling for common repair categories (e.g. brakes, driveline, ADAS)

- Easy access to usage guides or video tutorials

2. Require OEMs to provide onboarding documentation or training for their portals, particularly where systems are known to be complex or non-intuitive.
3. Explore the development of a national "access hub" or aggregator interface, enabling streamlined access to multiple OEM portals through a single point of entry, potentially administered by AASRA or an approved third-party provider.

By addressing these usability challenges and standardising access pathways, the Scheme can better support repairers across the country. These improvements would also ensure the Scheme delivers on its intended benefits of equitable access, industry competitiveness, and consumer choice.

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 positive and measurable impact on outcomes for customers of independent repairers. By enabling access to OEM service and repair information, the Scheme has enhanced the ability of independent workshops to offer dealership-standard servicing and diagnostics thereby improving convenience, building trust, and boosting customer satisfaction.

Customers increasingly benefit from:

- Convenience: Many no longer need to return to authorised service centres for software updates, module resets, or complex diagnostics, as independent workshops can now perform these tasks in-house.
- Confidence: Knowing that independent repairers are using accurate, up-to-date OEM procedures reinforces perceptions of professionalism and safety.
- Trust: Transparency in following OEM specifications strengthens consumer confidence and loyalty toward independent service providers.

However, access limitations under the current Scheme continue to affect some customer outcomes. Delays in retrieving critical vehicle information can still lead to extended wait times, incomplete diagnostics, or in some cases the inability to complete a repair. One repairer shared that they had to send a customer's vehicle elsewhere because "we couldn't hold onto the customer's vehicle any longer," illustrating how unresolved access delays disrupt service delivery.

Another respondent noted, "small shops... have a huge following by customers already burned by dealerships," highlighting the growing expectation that independent repairers offer a reliable, high-quality alternative. When access is restricted or fragmented, those expectations can be difficult to meet, particularly in time-sensitive or software-based repair scenarios.

While the Scheme has clearly improved the customer experience in many areas, resolving access and usability issues will further enhance repairer capability and consumer outcomes across the board.

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.***

MTAA supports the Scheme as a mechanism for RTOs to access specific information from OEMs so they can conduct training on how to undertake repair work safely and with confidence. However, it is our understanding that there is often a lack of awareness of the Scheme itself amongst RTOs. For example, not all RTOs are aware of or use the Scheme, yet the Act is clear that the Scheme is specifically for RTOs, so there appears to be a disconnect in the sector.

In our discussions with one RTO using the Scheme, they noted its benefits:

"Yes, we do use AASRA. In the past we generally sign up for a week's subscription, then download the relevant information in bulk and use this with training. I have a file where the information is stored and can be drawn on an as-needs basis. It has been beneficial to the light side of the business, predominantly the electrical side."

There are also potentially some issues with lack of clarity around EV training qualifications, particularly in relation to courses promoted at trade shows. At this stage, this is anecdotal but may warrant follow-up to ensure clarity around required training.

These points indicate a need for greater communication between RTOs and AASRA. MTAA therefore recommends that an RTO, ideally an industry not-for-profit RTO, be represented on the AASRA board.

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.***

Scheme RTOs continue to face barriers in delivering relevant and up-to-date training due to incomplete or difficult-to-access information.

While repairers called for improvement around "work instructions and diagnostics," in our survey results, these are fundamental to both classroom and hands-on learning. Without access to fault diagnostics, service schedules, and updated repair instructions, RTOs are limited in their ability to train job-ready technicians.

These limitations risk undermining the effectiveness of technical training, particularly in areas of growing demand such as EV systems and advanced diagnostics. Removing barriers to high-quality technical information and ensuring stable, modern access platforms are key steps toward improving outcomes for training organisations and students.

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

Although the Scheme is intended to support training outcomes, inconsistent access to service information continues to limit the quality and scope of instruction available to students. Training providers have raised concerns about difficulty sourcing up-to-date repair manuals, diagnostics, and technical bulletins, which directly impacts the development of job-ready skills.

Industry feedback suggests stronger regulatory action is needed from the ACCC to address ongoing issues with non-compliance, inflexible subscription models, and intentional information barriers. These issues flow through to RTOs and ultimately affect the confidence and capability of new entrants to the automotive workforce.

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.*

Although the Scheme has improved information availability in some areas, structural gaps in delivery continue to benefit dealerships and preferred repairers commercially. Independent businesses indicated that the continued dominance of OEM-linked networks is reinforced by exclusive access to systems, tools, or workflows that are still difficult to replicate outside of authorised channels.

While the intent of the Scheme is to support open competition, the reality is that dealers often maintain a more streamlined interface with manufacturers. This allows them to complete repairs more efficiently and retain work that may otherwise be serviced elsewhere. The perception remains that OEM-aligned repairers are not subject to the same operational barriers, which undermines the principle of competitive neutrality and impacts the broader market balance.

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

While the survey feedback primarily reflects the experience of independent repairers, consistent with the response above, it highlights structural differences that may continue to influence the way dealers and preferred repairers operate. OEM-aligned providers are likely to benefit from more direct and consistent integration with manufacturer systems, platforms, and service protocols.

The relative ease of access to technical data, diagnostic workflows, and brand-specific support tools may allow these businesses to streamline their aftersales servicing operations. In contrast, independent workshops often reported fragmented access and inconsistent interfaces, suggesting that dealer models may be better positioned to maintain operational efficiency under the current framework. Though no quantified impacts were identified, these conditions suggest the Scheme has not significantly disrupted traditional OEM-aligned service models.

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.*

Customers of dealers and preferred repairers benefit from more consistent servicing outcomes due to their direct connection with manufacturer systems. Independent workshops described having to refer vehicles back to dealerships when access to critical information was blocked or incomplete.

As a result, dealerships are positioned to deliver faster and more predictable repairs, reinforcing customer reliance on OEM networks and diminishing the role of independent providers in complex or time-sensitive servicing.

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.*

While direct consumer feedback was not formally captured through this consultation process, insights gathered from independent repairers and industry stakeholders suggest that the Scheme has had a positive, if indirect, impact on consumer choice and experience. MTAA notes that access to OEM service and repair information has enabled more independent workshops to confidently service late-model and technologically advanced vehicles, including those requiring software-based diagnostics and repairs.

This improved access has:

- Reduced consumer reliance on dealership networks, particularly in regional and remote areas
- Increased the capacity of local workshops to offer dealership-quality service
- Enhanced consumer convenience by allowing repairs to be completed locally without referral to brand-authorised centres

These outcomes indicate that the Scheme is broadly fulfilling its intended purpose to promote consumer choice, affordability and equitable access to repair services.

However, ongoing limitations in data delivery, usability and timeliness continue to restrict some independent repairers' ability to complete repairs in a competitive and efficient manner. This may result in delayed service, incomplete repairs or the need to refer customers back to dealerships, which can undermine the full benefits the Scheme aims to deliver.

While qualitative insights point to a positive shift, we recommend that future evaluations of the Scheme incorporate direct consumer feedback through surveys or case studies to more comprehensively measure customer outcomes and inform further improvements.

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

Remaining barriers to consumer choice are closely tied to the complexity and inconsistency of the platforms that repairers must navigate to access service and repair information. Workshops are required to use multiple portals with different layouts, login processes and access requirements, which can slow down service delivery and impact a consumer's ability to rely on their preferred local provider.

Additionally, the lack of standardisation across OEM systems means that even experienced repairers may struggle with certain makes or models, discouraging them from accepting some jobs. As a result, consumers may have fewer viable repair options in their area, particularly for newer vehicles or brands with more restricted systems.

These obstacles reinforce a reliance on dealer networks, not because of technical capability, but due to inefficiencies and fragmentation in data access pathways. Reducing platform complexity and improving system consistency would help level the field and expand genuine consumer repair choice.

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.*

At this stage, the Scheme does not appear to have caused major shifts in pricing or service delivery across the independent repair sector. While access to OEM service and repair information involves some additional costs (such as subscription fees or pay-per-use charges) these are generally modest and absorbed within standard diagnostic or labour pricing. As a result, there has been no clear evidence of widespread price increases for consumers.

Instead of altering core business models, many workshops have used the Scheme as an opportunity to broaden their service capabilities. Access to OEM tools and technical procedures has allowed some repairers to offer more specialised services, including software updates, reprogramming, and diagnostics for complex vehicle systems. These enhancements are largely seen as improvements in service quality, rather than direct commercial outcomes of the Scheme.

Overall, while the Scheme has contributed to the technical growth of some businesses, its impact on pricing structures and profitability remains limited and highly variable between workshops.

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?*

Feedback suggests that users often face access issues and technical problems that go unresolved through formal dispute channels. One respondent reported "Subscription successful but communication error. Delays for several days to reach anyone regarding issues. One week to get a refund. Two weeks for a reply on what

happened." These delays suggest a lack of timely resolution processes and limited follow-up by platform administrators or OEMs.

Such experiences indicate that although users attempt to resolve issues, the absence of an accessible or effective support mechanism leads to prolonged delays or abandonment of the process altogether. In the absence of structured resolution outcomes, some repairers simply stop engaging with the Scheme.

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?*

Several respondents expressed frustration with the accessibility and responsiveness of support services under the Scheme. One repairer shared, "Registered with AASRA but had issue with account/accessing information – no one returned calls or helped with issue so gave up." This reflects broader concerns about the visibility and usability of support mechanisms, particularly when technical or administrative issues arise.

Others described operational delays linked to limited support, such as, "System outages which causes delays and lost time. Quick to resolve but frustrating." These experiences highlight the need for more visible escalation pathways, consistent support protocols, and clearly defined response timeframes for resolving problems.

MTAA believes the dispute resolution framework outlined in the Act is, in principle, sound. It provides a structured process for escalating and resolving issues between data providers and scheme participants. However, to our knowledge, the formal process has not yet been utilised. This may indicate one of two possibilities:

- The Scheme is operating effectively and issues are being resolved informally, suggesting general compliance and cooperation; or
- Repairers may face barriers to engaging with the process, such as a lack of awareness, perceived complexity or previous negative experiences, which discourage them from raising legitimate concerns through formal channels.

MTAA therefore recommends the following:

- Conduct a review into awareness and accessibility of the dispute resolution process, with a particular focus on small and regional businesses.
- Develop and distribute clear, easy-to-follow materials such as flowcharts, checklists or short guides to help repairers understand when and how to escalate issues.
- Consider proactive communication strategies to build trust in the support framework and encourage early use of dispute resolution pathways where appropriate.

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, provides a key dispute resolution mechanism through the Missing Information Report (MIR) process. This allows repairers to report issues with incomplete or inaccessible service and repair data. Since the Scheme commenced, the MIR process has become more functional and responsive, reflecting AASRA's commitment to fulfilling its role under the legislation.

However, survey feedback suggests that several challenges remain:

- Response times can be inconsistent, with delays in some cases affecting workshop operations.
- Communication during the resolution process is occasionally limited, leaving repairers unsure of the status or progress of their submission.
- As the number and complexity of MIRs increase, AASRA's current capacity may be under strain, impacting timely resolution.

Given the above, MTAA therefore makes the following recommendations

- The Government should consider providing additional funding or resources to AASRA to strengthen its capacity to manage MIRs and related dispute functions.
- Introduce clear performance benchmarks or service standards for MIR response and resolution timeframes.
- Improve communication protocols to ensure that repairers receive regular updates on the status of their submission, not only at the point of closure.

These steps would help ensure that the dispute resolution process remains accessible, efficient and transparent, ultimately supporting greater trust and compliance across the sector.

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?*

One of the core challenges raised by Australian repairers under the current Scheme is the fragmented and inconsistent access to service and repair information across OEM platforms. Each manufacturer uses its own portal, fee structure, technical formats, and security procedures making access time-consuming, costly, and inconsistent.

To address this, Australia should consider establishing a centralised, independent platform, managed by a trusted third party, through which all OEMs are required to provide standardised access to service and repair data. This would mirror the system mandated in the U.S. state of Massachusetts, which has been upheld as a leading model for secure, balanced data access in the auto sector.

The Massachusetts model legally mandates OEMs to transmit vehicle telematics and diagnostic data to a centralised, standardised third-party platform. This system allows independent repairers and workshops to access necessary information using secure credentials, eliminating the need to individually negotiate terms or subscription models with each manufacturer.

By requiring OEM participation in a unified platform, the model prevents data monopolies and curbs anti-competitive behaviour, while ensuring strong compliance with security protocols. Importantly, the platform is technology-neutral and governed by an independent entity, rather than by manufacturers.

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

One recurring concern not explicitly addressed in the discussion paper is the limited promotion and visibility of the Scheme and its administrator, AASRA. Feedback indicates that many in the industry are either unaware of the Scheme or unsure of how to engage with it effectively. As one participant put it, "I was not aware of this Scheme or who AASRA is until now," highlighting the need for broader communication and outreach efforts.

Survey data shows that only 59 per cent of respondents access Scheme information, suggesting that uptake may be limited by confusion, perceived value, or technical barriers. One submission noted, "I am still unsure what I'm getting from AASRA," underscoring a lack of clarity about what is available through the platform and how it benefits users.

There is also strong sentiment around inconsistent participation by manufacturers, particularly those who avoid compliance or make data difficult to access. These issues point to the need for stronger enforcement and a review of current compliance mechanisms to ensure that all OEMs are meeting their obligations transparently and consistently.

Finally, one survey responder shared that "most insurance companies refuse to pay the subscription fees," which we believe should be investigated further.

Conclusion

The Motor Vehicle Service and Repair Information Sharing Scheme is a critical step forward in achieving fairer access to vehicle data and has delivered a net positive benefit for repairers. However, while there have been some early improvements in access for certain brands, these gains are undermined by inconsistent OEM participation, poor platform usability, excessive costs and limited awareness of the Scheme and its administrator, AASRA.

Independent repairers, training providers and consumers continue to face barriers that restrict competition, delay repairs and erode confidence in the sector's ability to service modern vehicles. Meanwhile, OEM-aligned businesses retain a structural advantage that the Scheme was intended to reduce.

To ensure the Scheme delivers on its promise, the ACCC must take a more active enforcement role and hold data providers to account. AASRA must improve its visibility and engagement with industry, and the Scheme must provide clearer, more consistent and affordable access to the information that underpins vehicle safety and repair quality.

Without these reforms, the Scheme risks embedding inequities rather than resolving them. With the right adjustments, however, it can become a practical and trusted framework that supports a stronger, fairer and more competitive automotive repair industry.

For more information

If you have any questions or would like to discuss the contents of this submission, please contact:

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