



Australian Government



Australian
**Small Business and
Family Enterprise**
Ombudsman

23 September 2021

Market Conduct Division
Treasury
Langton Crescent
PARKES ACT 2600

via email: repairinfo@treasury.gov.au

Dear Sir/Madam

Motor vehicle service and repair information sharing scheme - scheme rules (Rules) exposure draft

We support the establishment of this mandatory scheme for the sharing of motor vehicle service and repair information. Implementing the scheme will promote competition in the automotive sector and level the playing field for all repairers, the bulk of which are small businesses. We also look forward to contributing to consideration of extending the scheme to vehicle types other than passenger and light goods vehicles, and to automated vehicles and telemetrics.

It is commendable that the Rules focus on the safety of repairers and the security of vehicles. The close consultation with the industry-sourced working group in preparing these Rules shines through in how reasonable and workable the technical and administrative details are. The Rules would benefit from further clarification around how to apply the requirement that safety and security information and other, unrestricted, scheme information be only separated to the extent that it is “reasonably practicable” to do so. Taken too broadly, this provision could unnecessarily limit the opportunities available to independent repairers.

Another potential concern is the cumulative regulatory burden for individuals whose repair business needs access to safety and security information from numerous data providers. We would encourage data providers to engage with industry-led arrangements, including for instance an online portal, to reduce the administrative burden imposed on those individuals in meeting the safety and security access criteria detailed in the Rules. Consideration should be given to the Scheme Adviser being tasked with reporting on the administrative load generated by the Scheme, with a view to making any appropriate adjustments to how the Scheme is implemented.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mike Kearney on 02 6213 7443 or at michael.kearney@asbfeo.gov.au.

Yours sincerely

The Hon Bruce Billson
Australian Small Business and Family Enterprise Ombudsman

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