

The intention of the draft mandatory code appears well directed. The reality is that the commercial pressures on manufacturers will always be towards behaviours that do not extend the life of any of their products beyond what is acceptable to the public. This includes the decision to restrict access to repair support information to those who are not within their business influence (ie. only endorsed repairers, and on the manufacturers terms).

The impact of these behaviours includes (amongst other effects) the tendency for repair costs to increase as the vehicle age, not necessarily due to the increased cost of the actual repair, but because there are commercial interests in the manufacturer-controlled repairers network for the consumer to be “encouraged” to purchase a newer model. This has a significant, unnecessary detrimental impact on our resources/environment as it can be quite easily shown that the resource “cost” of manufacturing a new vehicle is significantly greater than the repair or refurbishment of an existing vehicle.

Similarly, it can be shown that the amount of recycled material that can be extracted from breaking down a vehicle into its raw components is a small fraction of the original material consumed - and that’s ignoring the energy consumed in the original manufacturing processes.

It is quite clear that there are significant advantages to society if we can increase the amount of vehicles that re being repaired rather than scrapped and replaced with new products. This country does not require (in any meaningful way) that the manufacturer be made responsible for their part of this environmental impact and so there is very little incentive for them to support healthy, long-term repair strategies. Despite a potentially significant difference in environmental impact between these two strategies, a vehicle that is designed and supported to have an economical life of >10 years is usually less attractive to a manufacturer than one that is turned over every 3 or so years. If the dealer-network maintains the right of control over the necessary vehicle repair information, they will most likely continue to behave in a manner that may be good for business, but not good for our environment.

While the draft code is focussed on commercial repairers - and establishing a competitive pressure on the non-dealer network repairers for the good of the consumer, there is still the sector of the market that is highly desiring of conducting their own repairs - either due to being located a long way from the repairers, or due to their personal preference for controlling their own costs and quality of repair, or to keep older vehicles functional and safe when the commercial repairers no longer wish to do the work.

To this end, I have serious concerns about the manufacturers hiding behind the exceptions related to “trade secrets” - who is going to test the manufacturers interpretation of this term. The intention of the code should be for manufacturers to make available ALL information and tools necessary to maintain, repair and upgrade these vehicles, whilst maintaining the existing protections afforded to these manufacturers that their intellectual property not be used outside of this purpose. I am aware of the great benefit that is gained by the ability for a vehicle enthusiast to extract vehicle sensor data, and to control particular system components using after-

market products as part of their activities to monitor and repair their vehicles. This should be supported by the mandatory code.

I understand the potential difficulty in retrospectively requiring access for vehicles already released in Australia, but if they are not included then there may be the temptation for the manufacturer controlled network to use this difference to further pressure the consumer to purchase a new vehicle (given the probable difference in competitive pressure on repair costs before and after the code is introduced).

The type of information and/or tools to be made available (under relevant intellectual property protection, of course) should include all data interfaces protocols and error code explanations for interfaces between replaceable components of the vehicle - such that these can be interrogated as part of a repair problem-solving process.

I thank you for the opportunity to make a submission on the Consultation paper: Mandatory scheme for the sharing of motor vehicle service and repair information.

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