FEDERAL CHAMBER OF AUTOMOTIVE INDUSTRIES

FCAI submission in response to:

Review of the Motor Vehicle Information Sharing scheme

4 AUGUST 2025

FEDERAL CHAMBER OF AUTOMOTIVE INDUSTRIES
Level 1, 59 Wentworth Avenue
KINGSTON ACT 2604

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1. EXECUTIVE SUMMARY

The Federal Chamber of Automotive Industries (FCAI) welcomes the opportunity to respond to the review of the Motor Vehicle Information Sharing (MVIS) scheme.

The FCAI is the peak Australian industry organisation representing over 60 global automotive OEMs who design, manufacture, import, distribute and sell light duty passenger vehicles, light commercial vehicles, and motorcycles in Australia. The scheme is primarily directed at the FCAI members as it mandates that "*all service and repair information that car manufacturers share with their dealership networks must also be made available to all independent repairers and registered training organisations*".

The FCAI is represented on the Board of the scheme adviser AASRA alongside the AADA, MTAA and AAAA. The opinions included in this FCAI submission are those of FCAI.

The MVIS scheme has imposed a significant financial burden on OEMs without delivering its intended benefits:

- A recent FCAI member survey found initial MVIS compliance averaged $340,000 with ongoing operational costs of $120,000 per annum per brand. This contrasts with an average annual revenue of $20,000 from the sale of scheme information.
- The uptake by automotive technicians has been negligible, with AASRA membership stagnating at approximately 1% of the targeted workforce.
- There is no evidence of increased consumer choice for repair and service providers, nor cost savings for any scheme participants or the end consumers.

The FCAI therefore recommends against expanding or increasing the MVIS requirements on OEMs. Instead, this review should focus on:

- minimising costs while maximising benefits as all costs associated with the regulations are ultimately borne by consumers.
- ensuring independent repairers effectively and appropriately utilise the information made available through the scheme.
- protecting OEM information from unauthorised sharing between technicians or distribution by potentially unlicensed data aggregators.
- providing greater flexibility to OEMs regarding the practicalities of making their diagnostic solutions available to scheme participants.
- reinforcing qualification requirements for access to safety information, particularly for safe Electric Vehicle (EV) repair.
- ensuring AASRA fulfills its intended role in mediation between scheme participants.

The following section captures responses to the questions raised in the discussion paper.

2. FEEDBACK ON INFORMATION PROVISION

Q1: Does the scheme apply appropriately to the information needed for Australian repairers to diagnose faults, service, repair modify or dismantle scheme vehicles, and Scheme RTOs to provide training for diagnosing faults with, servicing, repairing, modifying or dismantling scheme vehicles?
Q2: 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?

Evidence of the scheme's impact on repairers and RTOs is unclear.

Crucially, the scheme includes a formal mediation process via the scheme adviser, AASRA, for any issues scheme participants may encounter. No mediation requests have been lodged in the scheme's first three years of operation.

This absence of disputes, coupled with the extremely low and plateauing AASRA technician membership (approximately 3,000 technicians since July 2023, or 1% of over 320,200 workers nationally), indicates that the scheme has generated negligible practical benefits for independent repairers' ability to competitively conduct these activities.

The FCAI does not support the inclusion of vehicle telematics data as scheme information due to lack of practical need, significant complexity, and potential negative consequences:

- Current vehicle diagnostic solutions already accessible through the MVIS scheme provide all necessary information for fault diagnosis and repair.
- Only 10-15% of the vehicles in the Australian car parc are connected. Imposing additional data sharing mandates, in yet another regulation, risks hindering the uptake of vehicle connectivity.
- Mandating the sharing of this sensitive information with repairers would create an exceedingly complex regulatory and operational burden for OEMs and government agencies, raising significant concerns under existing privacy frameworks.
- Requirements on OEM telematics data would need to be reciprocated on aftermarket telematics data, creating a highly complex and difficult-to-enforce regulation.

The FCAI does not support the inclusion of vehicle maintenance and repair logbook data. Access to logbook data is not a prerequisite for essential repair work as all repairers already employ professional vehicle inspection procedures, and vehicle diagnostic outputs provide all necessary information. Furthermore:

- OEM-franchised workshops would also seek access to independent repairers' logbook entries. Including logbook data would effectively transform every repairer,

including independent workshops, into a data provider under the MVIS scheme, burdened with data contribution, accuracy management, and the associated regulatory overhead.

- Repairers would not know which businesses have previously worked on a vehicle. Mandating access would necessitate the development of a costly and complex national platform for all repairers (independent and OEM-franchised) to input data, manually or automatically. The MVIS legislation would also need to define the specific information to be included in "logbooks" and establish mechanisms for managing data accuracy – a technically complex exercise.
- Logbooks frequently contain personal information such as owner's name, address, VIN, registration, odometer readings, and potentially details linked to driver behavior or location. The collection, storage, and sharing of this information fall under the Privacy Act 1988 and the Australian Privacy Principles. Mandating broad sharing between repairers would require complex and robust data management and protection protocols.
- Vehicle owners currently retain the sole right to maintain accurate records of their vehicle's service history and choose with whom to share it. While they can request access to work undertaken by their chosen repairers, individual repairers typically only retain records for their own work for a limited period.

The FCAI is unaware of any instances where FCAI members might have restricted repairers' access to specific parts on security grounds. FCAI members have a direct commercial interest in maximising genuine parts sales. Should any legitimate parts access issues arise, affected parties can utilise the established mediation process via the scheme adviser. No such mediation requests have been received in the scheme's three years of operation.

The FCAI does not support the inclusion of Automated Driving Systems (ADS) data as scheme information as vehicles with Level 3 or higher ADS are not currently permitted on public roads. Further information can be found in the 2024 FCAI's submission to the joint DITRDCSA and NTC consultation on proposed automated vehicle safety reforms, which outlines FCAI's position on ADS repair and maintenance.

Introducing broad competition for service and repair work on Automated Vehicles must be a progressive process, and any requirements for information sharing would be best incorporated into the overarching AVSL (under the Transport portfolio).

The FCAI supports the existing exclusion of "*commercially sensitive agreements between a data provider and another person*" from scheme information.

Individual OEMs must retain the autonomy to determine if and how they utilise contracted parties to distribute their technical information. It is an OEM's right to manage their intellectual property, maintain quality control, pursue their commercial strategies, and secure their data. Removing the autonomy to select and contract with information

distributors undermines these critical business principles and could have unintended negative consequences for the market as a whole.

Q3: 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?

Since the scheme's commencement on 1 July 2022, OEMs have provided Australian repairers and scheme RTOs with access to their vehicle technical information. This information is made available through platforms and in formats comparable to those used by their franchised networks.

The high level of OEM compliance is evidenced by the absence of user-initiated disputes and the limited enforcement action taken by the ACCC.

Regarding the appropriateness of the existing obligations, the FCAI strongly recommends not expanding the requirements on OEMs. The implementation of the current scheme has already imposed a significant and disproportionate financial burden on OEMs to adapt existing global systems and processes for the Australian market. Any modification or addition to current requirements would impose further costs on OEMs, likely adding to the pricing of scheme information or vehicles and ultimately disadvantaging consumers.

One critical area where this review must consider greater flexibility pertains to the provision of OEM diagnostic solutions and their associated timeframe requirements.

Diagnostic solutions vary greatly between OEMs as they may:

- Rely on proprietary hardware and specialised pass-through devices for vehicle connection.
- Be installed as a software component on a computer meeting specific technical specifications.
- Feature varying levels of integration and remote connectivity with central OEM systems (e.g. for remote software updates, access control).
- Provide integrated access to vehicle technical information linked to fault codes.
- Consolidate all functionalities into a single access point or incorporate granular controls for specific functionalities related to safety, security, or ECU programming.

The ACCC, in its guidance to data providers issued in December 2022 – six months after the legislation's commencement – unilaterally included OEM diagnostic tools within its definition of scheme information. This was not appropriately consulted on in the legislation development and has imposed significant operational constraints on OEMs.

A prime example is the requirement to provide proprietary hardware diagnostic solutions for one-day access periods. The logistics of securely packaging, dispatching, and receiving these specialised tools while adhering to stringent response times is exceptionally demanding and often cost-prohibitive for OEMs.

The FCAI recommends that the MVIS legislation be amended to provide greater flexibility concerning the practicalities of OEM diagnostic solutions. Specifically, the FCAI propose removing the requirement for one-day access when the diagnostic solution necessitates the use of proprietary hardware.

Q4: 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?

Rights and obligations should vary by the type of data provider within the MVIS scheme, reflecting their distinct roles and the nature of the information they handle.

The first three years of scheme operations have demonstrated that it is inappropriate and impractical for data aggregators to be considered data providers in the same manner as OEMs. The primary function of data aggregators is one of repackaging and distributing OEM information, not generating primary vehicle data.

To ensure proper oversight and accountability, data aggregators should be explicitly covered by the scheme, with specific obligations to be appropriately licenced by OEMs to distribute their proprietary information in the Australian market, and effectively manage access to sensitive safety and security information as per scheme rules. However, the requirements for data aggregators to provide their scheme offers to AASRA should recognise their multi-brand, aggregated service models, which differ fundamentally from a single OEM's offering.

The Treasury should develop a much deeper understanding of the data aggregator market, including their diverse solutions, their distribution channels, commercial offerings, and overall market shares, to design proportionate and effective regulatory requirements.

The ACCC's guidance indicates that scan tool providers and used vehicle importers are deemed data providers under the scheme. However, the precise applicability of MVIS legislation to them remains largely undefined. This review presents the opportunity to clarify their specific rights and obligations. Specifically:

- Regarding scan tool providers: Many scan tools, particularly aftermarket ones, possess safety-related functionalities and can even be exploited in criminal activities to circumvent vehicle security features. Robust control measures for scan tool providers are necessary, including potential requirements for technician verification and accountability for misuse.
- Regarding used vehicle importers: These entities should bear the same rights and obligations as OEMs for the vehicles they import into Australia. OEMs should not be expected or mandated to provide scheme information for vehicles they did not originally import into the Australian market.

To ensure the MVIS scheme achieves its full potential and addresses emerging industry realities, the review must also clarify the obligations of third-party providers offering remote diagnostic and technical support services to independent repairers. This clarification is essential to guarantee these entities possess the necessary licences for OEM

information distribution and that they rigorously verify the safety and security credentials of the technicians they assist.

Q5: Is scheme information made available by data providers subject to reasonable terms?

The total absence of any dispute suggests that there is no issue regarding the terms and conditions OEMs may place on the sale of their scheme information.

Should repairers or scheme RTOs experience any issue, they can approach the scheme adviser AASRA for mediation with the data providers. The FCAI cautions for any additional requirements being placed in the MVIS legislation and instead recommends for the relevant stakeholders to use the processes at their disposal to manage any specific issues.

Q6: Do the requirements concerning timeframes for the provision of scheme information remain appropriate?

The FCAI recommends that the MVIS legislation be amended to provide flexibility concerning the practicalities of OEM diagnostic solutions.

Q7: Is the pricing of scheme information transparent and does it reflect fair market price?

The pricing of scheme information is transparent and OEMs have consistently adhered to fair market value as evidenced by the absence of intervention by the ACCC in this area.

OEMs are currently operating under a pricing model where they do not fully recover their capital and ongoing operational compliance expenditures through the sale of scheme information. This current pricing dynamic creates an environment that is disproportionately advantageous to independent repairers, as they benefit from highly subsidised access to proprietary OEM information.

Q8: In addition to the price of scheme information, what other costs, if any, impact the operation of the scheme or compliance with it?

Another significant, yet unforeseen and unrecovered costs for OEMs arise from the provision of on-going technical support to independent repairers.

When independent repairers encounter difficulties accessing or interpreting OEM scheme information, or when they require clarification on complex procedures, they frequently seek technical assistance directly from the OEM. As a result, most OEMs have established a dedicated position within their support teams to address these inquiries.

These additional operational costs, driven by the scheme's indirect demands, are currently not factored into the pricing of scheme information. OEMs incur further significant financial losses in effectively supporting the scheme's ecosystem beyond their statutory obligations.

Q9: If cost is a barrier to the effective operation of the scheme, how may this be addressed?

Cost to independent repairers is not a barrier to the effective operation of the MVIS scheme, nor does it adequately explain the persistently low number of technician accounts within AASRA. This minimal uptake occurs despite OEM scheme information not factoring in the majority of their compliance and operational costs.

Instead, the primary "barrier" to the effective operation of the scheme is the market reality that independent repairers overwhelmingly prefer and will continue to utilise data aggregators (or other sources of information) for accessing the information they need.

This fundamental market reality was inadequately considered during the drafting of the MVIS legislation despite the warnings in the 2019 and 2021 FCAI submissions where the FCAI contended that the 2017 ACCC Market Study did not sufficiently justify the scheme's implementation. As the FCAI highlighted then, the take-up rate by independent repairers has consistently been very low in comparable international mandatory information sharing schemes and even in local examples where individual brands voluntarily offered information platforms before MVIS.

3. FEEDBACK ON INFORMATION PROTECTION

Q10: Do the existing definitions of safety and security information remain appropriate? If not, why?

The existing definitions of safety and security information remain appropriate. Further, the current scheme's requirements for specified access criteria and stringent record-keeping regarding access to security information are crucial and fully justified.

The inherent dangers associated with EVs underscore the necessity of these definitions. Modern EVs operate with 400-to-800-volt DC systems, with a clear trend towards 1,000-volt architectures to facilitate ultra-fast charging. Without specialised training, automotive technicians are at risk of injury or death from severe electric shock.

Similarly, the definitions for security information are vital given the escalating threat of criminal exploitation. Modern vehicle security features, if compromised, can be readily exploited for criminal activities, including vehicle theft and illicit modifications. Law enforcement agencies, such as Victoria Police, have highlighted a concerning trend of increasing vehicle theft and other criminal enterprises potentially leveraging readily available aftermarket scan tools and unauthorised access to security information.

Q11: 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?

The scheme currently fails to appropriately balance access to information with the critical protection of safety and security. While designed to facilitate access for independent repairers, the existing scheme rules inadvertently compromise worker and consumer safety by failing to mandate adequate competency standards for accessing sensitive information.

Specifically, the scheme's mandated training requirement for accessing high-voltage safety information – training course AURETH101: Depower and Reinitialise Battery Electric Vehicles (or equivalent) – merely provides an initial awareness of EV systems and does not guarantee a technician possesses the skills required for safe and effective EV repair.

Given the increasing availability of advanced EV training and the inherent safety risks associated with 400-to-1,000-volt DC systems, the scheme rules must be amended. The FCAI recommends requiring technicians to demonstrate a higher level of competency, specifically the AURSS00064 Battery Electric Vehicle Inspection and Servicing Skill Set qualification (or an equivalent course or manufacturer-provided/on-the-job training) for access to vehicle safety information.

While the MVIS scheme is primarily focused on competition, it has a clear opportunity – and arguably a duty – to serve this critical dual purpose by ensuring robust safety standards alongside market access.

Q12: Does the availability or accessibility of training impact the operation of the scheme? If so, how?

The availability or accessibility of training does not negatively impact the operation of the MVIS scheme, nor would the FCAI proposal for enhanced AURSS00064 training.

Evidence clearly demonstrates widespread access to relevant EV training beyond traditional TAFE centres. As per the publicly available RTO register on https://training.gov.au/, there are currently over 207 RTOs offering the AURETH101 training, and over 41 RTOs offering the more advanced AURSS00064 training.

Q13: Do practical difficulties exist in separating safety and/or security information from other scheme information? If so, what are these difficulties?

Significant practical difficulties exist in isolating safety and/or security information from other scheme information within OEM documentation and diagnostic solutions.

Safety and security-critical information is not typically segregated into standalone documents by OEMs. Instead, it is integrated within broader technical documentation that also covers multiple vehicle functionalities, systems, and components. Attempting to separate safety and security information from this interwoven structure can necessitate a complete, costly rebuild of technical documentation.

This challenge is compounded by the fact that OEM technical documentation is developed and managed at a headquarter level for global markets. Imposing additional requirements on OEMs to modify their global documentation to isolate specific information for the Australian market would lead to prohibitive costs. These substantial costs would inevitably be integrated into the pricing of scheme information, ultimately disadvantaging consumers through higher repair costs.

Q14: How might the challenges, if any, presented by the separation of safety and/or security information from other scheme information be addressed?

The balance can best be achieved by managing who can access the data and who is qualified to use it, rather than attempting to fundamentally alter how vehicle information is structured by manufacturers globally.

The scheme should remain aligned with the intent that OEMs must provide scheme information equivalent to what they provide to their franchised networks.

This review should ensure access criteria defined in the scheme rules are up to date. Consideration should be given to adding criteria for repairers' access to diagnostic solutions when these integrate functionalities with safety and security implications and mandating higher-level training qualifications for EV safety information.

4. FEEDBACK ON COMPETITION AND CONSUMER IMPACTS

Q15: Has the scheme impacted independent repairers' ability to competitively diagnose, repair, service, modify or dismantle scheme vehicles?

The MVIS scheme has no substantial impact on the independent repair sector. This conclusion is evidenced by the persistently extremely low level of technician engagement with AASRA, despite AASRA's extensive marketing and communication efforts.

Q16: What barriers remain in enabling independent repairers to compete effectively in the market for vehicle repair, service, modification or dismantling?

There are no systemic barriers preventing independent repairers from effectively competing in the market for vehicle repair, service, modification, or dismantling.

Indeed, the aftermarket industry is "*thriving*", as recently confirmed by the AAAA. Their data highlights that independent workshops have experienced:

- A 10% increase in market share over the past three years, now accounting for 60% of all service and repair activities.
- A healthy growth in workshop numbers, expanding by 12% over the last five years.

This robust growth indicates that the independent repair sector is highly competitive and effectively serving consumer needs, and therefore does not require further regulatory advantages that could distort market dynamics.

Q17: Has the scheme impacted outcomes for independent repairers' customers?

The FCAI is unaware of any quantifiable positive impact the MVIS scheme may have on independent repairers' customers to date.

Q18: Has access to service and repair information under the scheme supported delivery of effective and relevant training courses?

The FCAI is unaware of any substantial impact that the scheme may have on scheme RTOs or their ability to provide effective and relevant automotive training courses.

Very few AASRA accounts are currently held by scheme RTO representatives. This suggests that scheme RTOs are not in need of the direct information access facilities mandated by this legislation for their training development or delivery.

This limited direct engagement, however, should not be construed as a lack of available information or a challenge for RTOs to access necessary training materials. Many RTOs already have direct relationships with OEMs, or access information through established industry channels and training partnerships, to develop their courseware. They develop

their curricula based on nationally recognised training packages and industry needs, sourcing information from various channels, not reliant on the MVIS portal.

Q19: What barriers remain for scheme RTOs in delivering effective and relevant training courses?

There are no barriers that relates to access to OEM information that prevents scheme RTOs in delivering effective and relevant training courses.

The FCAI maintains close collaboration with the Automotive Jobs and Skills Council, AUSMASA and have not received any reports of systemic challenges affecting scheme RTOs.

Q20: How has the scheme impacted outcomes for students?

The FCAI is unaware of any impact the scheme may have on automotive students.

Q21: What has been the commercial impact of the scheme for dealers and preferred repairers?

The commercial impact of the scheme on OEM-franchised dealers is minimal – if any at all. Dealerships possess channels independent of the MVIS legislation to access repair and service information.

While franchised dealers theoretically could utilise the MVIS legislation when servicing, repairing, or reselling second-hand vehicles from brands outside their franchise, current uptake suggests this is not a common practice. Data provided by AASRA to OEMs during their quarterly update on 13 December 2024 indicates that only 4% of the accounts (i.e. 120 accounts) are held by technicians employed by dealerships.

Q22: Has the scheme affected the dealer or preferred repairer business models or approaches to aftersales servicing?

The FCAI does not believe the scheme has any impact on the business models or approaches to aftersales service in OEM-franchised workshops.

Q23: What impact, if any, has the scheme had for customers of dealers and preferred repairers?

The FCAI does not believe the scheme has any impact on customers of dealers.

Q24: How has the scheme impacted consumers' ability to choose their preferred repairer and experience in the repair of scheme vehicles?

The FCAI does not believe the scheme has any impact on consumers' ability to choose their preferred repairer or their experience in the repair of their vehicles.

Q25: What barriers, if any, remain in enabling consumers to exercise choice amongst Australian repairers?

The FCAI does not believe there are any barriers in enabling consumers to exercise choice amongst Australian repairers.

Further amendments to the MVIS legislation could distort market dynamics or create an uneven playing field, potentially impacting the sustainability of other market participants.

Q26: What impact, if any, has the scheme had on Australian repairers' business offerings and pricing?

The FCAI does not believe the scheme has any impact on repairers' business offerings and that it may have put any downward pressure on pricing of service and repair works.

5. FEEDBACK ON DISPUTE RESOLUTION

Q27: Describe the nature and outcomes of any disputes experienced in connection with the scheme? How, if at all, were these disputes resolved?

Again, the options for mediation and dispute resolution offered by the scheme and to be managed by AASRA have never been used in the first 3 years of scheme operations.

Q28: 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?

It is not possible to comment on the effectiveness of the dispute resolution framework as it has never been used in practice.

Q29: Are the Scheme Adviser's functions in connection with dispute resolution, including those relating to reporting, appropriate in supporting the resolution of disputes?

Mediation and dispute resolution is a core role of AASRA as defined in the legislation, although, sadly, in practice it has not been sufficiently used.

6. FEEDBACK ON OTHER ISSUES

Q30: 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?

Developments in other markets should be monitored but the specificities of the Australian market need to be appropriately considered to avoid undue burden and price increases.

Q31: What other issues not raised in this discussion paper relating to the scheme should be considered as part of the Review?

Vehicle compatibility with SAE J2534

OEMs have a right to develop and use proprietary diagnostic tools and protocols to ensure the integrity of their vehicles' systems. A one-size-fits-all approach like J2534 may not be suitable for all vehicle types and could create vulnerabilities that the OEM proprietary systems are designed to prevent. Further:

- Compatibility with the SAE J2534 standard does not guarantee comprehensive diagnostic or programming functionalities for all vehicle systems. OEM diagnostic systems extend far beyond simply "passing through" communication. They encompass sophisticated guided diagnostics, integrated fault-finding trees, dynamic wiring diagrams, component location guides, special function activation sequences (e.g. calibration routines for ADAS sensors, key programming), and complex variant coding/personalisation. J2534, by itself, is a communication interface; it does not provide these crucial higher-level functionalities. Consequently, independent repairers would still require access to, and proficiency with, the complete OEM diagnostic systems, rendering a J2534 mandate incomplete and potentially misleading in its perceived benefits.
- An OEM could not reasonably be expected to collaborate with, test, and guarantee compatibility across the potentially hundreds of self-certified J2534-compatible aftermarket pass-through device suppliers. Ensuring the seamless operation of constantly evolving OEM diagnostic software with such a vast and dynamic array of third-party hardware is practically infeasible.
- Mandating SAE J2534 compatibility would directly intervene in the design of vehicles. Discussions pertaining to the adoption of standardised communication interfaces like J2534 would be more appropriately considered within global vehicle design and standards forums (e.g. UNECE World Forum for Harmonization of Vehicle Regulations WP.29).

Qualification requirements for access to ADAS-related information

Once specific VET qualifications have been developed by the automotive Jobs and Skills Council AUSMASA in relation to ADAS at SAE Level 1 and 2, the scheme rules should be amended to set appropriate qualifications criteria for access to ADAS safety information.

Data providers' right to choose how they conduct the technician vetting process

All data providers should retain the autonomy to choose how they conduct the technician vetting process for access to restricted information. They should have the option to:

- Engage AASRA.
- Undertake the vetting internally.
- Utilise other qualified third-party support.

Ensuring use and adherence to OEM repair methodologies

The scheme's mandate should extend beyond mere availability to encompass the actual use and adherence to that information. Specifically, the MVIS scheme should incorporate requirements that mandate compliance with OEM-provided repair methods and procedures.

CONTACT

For more information contact:

Richard Delplace
Director Emerging Technologies
E Richard.Delplace@FCAI.com.au
M 0434 327 003

FCAI.COM.AU