



The Australian Industry Group
Level 2, 441 St Kilda Road
Melbourne VIC 3004
PO Box 7622
Melbourne VIC 3004
Australia
ABN 76 369 958 788

August 25, 2021

Right to Repair
Productivity Commission
4 National Circuit
Barton ACT 2600, Australia

By Email: right2repair@pc.gov.au

RE: Right to Repair Draft Report Consultation – Supplementary Submission

The Australian Industry Group (Ai Group) welcomes the opportunity to make a *supplementary submission* regarding the Right to Repair Draft Report. This should be taken in addition to our [substantive submission](#), dated July 15, 2021.

Ai Group is a peak national employer association representing and connecting thousands of businesses in a variety of industries and sectors across Australia. We remain committed to the pursuit of solutions to the waste crisis that are both financially and environmentally sustainable and recognise the place that right to repair (R2R) has in this discussion.

Spare parts and 3D printing

Ai Group members have acknowledged that 3D printing may be valuable in the spare parts space for some products, but for many, the technology as it stands does not provide a viable alternative to the manufacture and storage of spare parts. The reasons provided by our members include:

- While 3D printed parts may have the same dimensions, they oftentimes do not possess the necessary durability (strength, hardness etc.). An example provided by an Ai Group member was that of internal dishwasher parts, which require exceptionally good temperature stability, hygroscopic properties (water absorption) and chemical resistance. Such material is not available for 3D printers.
- 3D printing is not currently capable of replicating parts made of several different components and/or materials.
- Surface finish is a problem for 3D printed parts, particularly for product parts that are visible to consumers.
- More than one member noted that 3D printing is not particularly useful in relation to electronics and is unlikely to change the landscape for replacement parts in that industry.

Labelling – repairability versus durability

Members have expressed doubt as to whether labelling for repairability or durability would lead to more repair in Australia, and concerns about the practicality of implementing labelling schemes. Further member comments include:

- An OEM in the consumer electronics space noted that labelling would add costs to doing business, but questioned the benefit, particularly in the case of repairability. They and other members advise that consumers do not appear to purchase with repairability in mind and instead make decisions based on suitability for the task, brand reputation and the support of the retailer.
- With respect to durability of electronic products, Ai Group is advised that while there are some techniques and processes for determining the life of particular electronic components (LED's, capacitors etc.) there is no accepted standardised way to measure the durability of complex products as assembled (complex assemblies) over a lifetime.
- An OEM with a product that has a life of 10 to 20 years noted that so long as routine servicing requirements are followed, durability of their product is already guaranteed to the consumer, repairability is implied, and therefore a rating would not add value. This fits with a view expressed by several members that there should not be a 'one-size-fits-all' approach to labelling for repairability and/or durability, if implemented.
- Although the overall value of implementing either labelling provision was questioned by *all* members that provided feedback, a member in the outdoor equipment space did indicate a preference for repairability over durability as a guide for consumers. Their reasoning was that repairability can be judged on specific criteria relevant to real world situations, where durability relates more to modes, patterns of use and maintenance practices, which are less relevant to consumer experience.
- Ai Group have been warned that some businesses may 'game' labelling provisions, exploiting loopholes or a lack of compliance enforcement activity to mislead consumers and gain competitive advantage over honest market players.
- Numerous members noted that it would be expensive and a significant challenge to design metrics for durability/repairability that would be accurate and valuable to consumers while eliminating self-assessment biases.

Business to business (B2B) transactions

Ai Group suggests the Commission avoid R2R recommendations aimed at household consumer goods that could create unintended issues in the B2B space. The refinement of some definitions and language in the report, along with more detailed information about exclusions would be welcome.

Connection to Home Affairs consultation:

'Strengthening Australia's cyber security regulations and incentives'

Ai Group note that this early-stage consultation may have a later impact to the IP, privacy, and security dimensions of R2R. We encourage cross-departmental collaboration wherever possible and would recommend the PC consider discussing common interests with Home Affairs directly if it has not already.

Intellectual Property (IP)

Ai Group received a further member comment with respect to IP and R2R:

“[With regard to] access to software – OEM diagnostic software often involves specific cables and software and ongoing training and updates, [we question] how this [can] be managed for a 3rd party repairer. Additional software subscriptions are sometimes required for specific components. An example is an engine manufactured by X fitted to a machine manufactured by Y. [In this circumstance it is] difficult to manage access to an ‘outside’ party.”

Should you wish to discuss the matters raised in this supplementary submission, please contact our advisor Rachael Wilkinson

Sincerely yours,

Louise McGrath
Head of Industry Development and Policy