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Right to Repair Consultation Team
Competition and Consumer Division

The Australian Treasury
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Lodged Online: <https://consult.treasury.gov.au/c2026-760808>

To whom it may concern,

RE: Improving and Expanding Australia's First Right to Repair Law – Discussion Paper

AgForce is a peak organisation representing Queensland's cane, cattle, grain and sheep, wool & goat producers. The cane, beef, broadacre cropping and sheep, wool & goat industries in Queensland generated around \$11.2 billion in on-farm value of production in 2022-23. AgForce is the leading voice for Queensland producers and strives to ensure the long-term growth, viability, competitiveness and profitability of these industries. Over 6,000 farmers, individuals and businesses provide support to AgForce through membership. Our members own and manage around 55 million hectares, or a third of the state's land area. Queensland producers provide high-quality food and fibre to Australian and overseas consumers, contribute significantly to the social fabric of regional, rural and remote communities, as well as deliver stewardship of the state's natural environment.

AgForce welcomes the opportunity to provide this submission in response to the Australian Government's *Improving and Expanding Australia's First Right to Repair Law (the Scheme)* Discussion Paper and support the Australian Government's commitment to extending Australia's Right to Repair framework to agricultural machinery.

AgForce is a long-standing and proud member of our national peak body. AgForce has contributed to and supports the National Farmers Federation (NFF) submission. However, the AgForce submission is separate and intended to complement the NFF submission, providing additional policy guidance, recommendations and offering practical experience of Queensland producers operating across Australia's largest agricultural state, where vast distances, seasonal production windows and regional servicing constraints present unique implementation challenges.

Executive Summary

AgForce supports the Australian Government's proposal to extend Australia's Right to Repair framework to agricultural machinery

AgForce considers the proposed reforms will improve competition within agricultural machinery repair markets, strengthen regional servicing capability, reduce machinery downtime and improve agricultural productivity. The legislation should be designed to deliver practical outcomes for machinery owners and producers while maintaining appropriate safeguards for safety, security and intellectual property and protection of legitimate manufacturer interests.

Agricultural machinery represents one of the largest capital investments made by farm businesses and has evolved from predominantly mechanical equipment to highly sophisticated digital production systems integrating software, diagnostics, embedded electronics, automation and precision agriculture technologies.

While these technologies have significantly improved productivity and operational efficiency, they have also increased reliance on manufacturer-controlled repair information, software and diagnostic systems.

These technologies have delivered substantial productivity gains but have also increased producer dependence on manufacturer-controlled repair information, software and diagnostic systems.

AgForce considers that machinery owners and appropriately qualified repairers should have practical, timely and non-discriminatory access to the repair information, software and diagnostics necessary to safely diagnose, maintain and repair agricultural machinery throughout its practical working life. This will improve competition, maximise the productive life of machinery, strengthen regional repair capability and support Australia's long-term food and fibre security.

While the proposed reforms appropriately focus on improving access to repair information, AgForce encourages the government to separately examine broader policy measures that improve long-term access to critical agricultural machinery replacement parts and components and digital technologies as part of Australia's broader food and fibre security and national supply chain resilience agenda.

The AgForce submission outlines eight practical policy considerations with recommendations, based upon practical experience of Queensland producers operating farm machinery across Australia's largest agricultural state, where vast distances, seasonal production windows and regional servicing constraints present unique implementation challenges.

AgForce recommendations

1. Expansion of the Right to Repair framework to include agricultural machinery where it promotes competition, innovation and consumer choice within agricultural machinery repair markets.
2. Require repair information to be supplied on fair, reasonable, timely and non-discriminatory commercial terms, ensuring appropriately recognised competent repairers have practical access to the same repair information available to authorised dealer networks.



3. Adopt the earliest practical manufacturing cut-off date, maximising the long productive life of agricultural machinery and recognising the significant capital investment made by producers; ensure agricultural machinery remains serviceable, repairable and digitally supportable throughout its practical working life.
4. Improve regional and remote servicing repair capability across Australia's vast operating conditions, by extending access to repair information to recognised competent repairers or demonstrated producers with experience and ensure eligibility requirements remain practical, affordable, regionally accessible, and are *not* used as a barrier to entry.
5. Protect manufacturer warranties where suitably competent repairs have not contributed to equipment failure.
6. Ensure the Right to Repair framework future proofs legislation by remaining technology-neutral and adaptable, supported by an ongoing review mechanism that enables more machinery classes to be incorporated over time.
7. Consider complementary policy measures that improve access to critical machinery components as a broader sovereign capability, supply chain resilience and food security agenda.
8. Undertake a post-implementation review of the expanded Right to Repair framework within three years of commencement to evaluate whether the legislation is working as intended.

AgForce Policy Statement

As agricultural machinery continues to evolve, Australia's agricultural productivity increasingly depends on highly sophisticated machinery integrating advanced software, diagnostics, automation, embedded electronics and precision agriculture technologies. While these innovations have improved productivity and operational efficiency, they have also increased owner-operator dependence on manufacturer-controlled repair information, software and digital support systems.

Therefore, AgForce considers the proposed Right to Repair reforms are no longer simply a consumer policy initiative. They represent an important agricultural productivity, competition and regional resilience reform that will strengthen Australia's long-term food and fibre security.

AgForce supports extending Australia's Right to Repair framework to agricultural machinery and recommends that the legislation should be designed to deliver practical outcomes for machinery owners, operators and producers, while maintaining appropriate protections for legitimate manufacturer interests. These reforms should be guided by one practical question:

“What does a practical Right to Repair framework look like for agricultural machinery owners, operators and producers that optimises cost effective, efficient, fair and reasonable repairs outcomes?”

AgForce considers the answer is reflected in one overarching guiding principle:

“Agricultural machinery should remain safe, serviceable, repairable and digitally supportable throughout its practical working life.”

This principle recognises that agricultural machinery represents one of the largest capital investments made by Australian farming businesses. Maximising the productive life of these assets improves



productivity, preserves business capital, strengthens regional servicing and repair capability and supports Australia's long-term food and fibre security.

The following eight policy considerations set out AgForce's recommendations for delivering a practical, fit-for-purpose, Right to Repair framework focused on machinery owner, operator, producer, manufacturers within Australian agriculture that has ability to deliver meaningful benefits for manufacturers, repairers, producers and machinery owners.

1. Repair markets should promote competition, productivity and regional capability

AgForce supports the proposed expansion of Australia's Right to Repair framework to agricultural machinery, because it represents an important competition and productivity reform for Australian agriculture.

The Australian Competition and Consumer Commission (ACCC) and Productivity Commission and Treasury's discussion paper have all identified that improved access to repair information can improve competitive repair markets reduce repair costs, improve consumer choice and encourage investment, strengthening regional repair capability.

Queensland producers often operate hundreds of kilometres from authorised dealerships. During critical production periods, machinery failures can result in substantial operational disruption, particularly where access to authorised repair services is limited by geography or seasonal demand.

Practical access to qualified independent repairers is therefore essential to maintaining productive farming operations.

AgForce supports a framework that improves competition while maintaining appropriate protections for safety, cybersecurity and intellectual property.

AgForce recommends: Expansion of the Right to Repair framework to include agricultural machinery where it promotes competition, innovation and consumer choice within agricultural machinery repair markets.

2. Access to repair information should be practical, timely and non-discriminatory

The effectiveness of the scheme will ultimately depend upon practical and timely access to repair information.

AgForce supports machinery owners and independent competent repairers having access to the same repair information, diagnostic software, calibration tools, technical manuals, service bulletins and software updates available to authorised dealer networks.

Agricultural machinery owners should be able to authorise who can access repair related machine data for the purposes of diagnosing, maintaining and repairing machinery they lawfully operate.

Access should be provided on competitive, reasonable and non-discriminatory commercial terms, consistent with the objective of promoting competition.

Artificial restrictions, excessive pricing, unreasonable licensing arrangements or unnecessary timing delays undermine the objectives of the legislation by reducing competition and increasing machinery downtime.



Agricultural production systems need predictable and timely access to repair information, which is particularly important during narrow production windows where delays of only a few days or even hours may result in significant production losses.

AgForce recommends: Repair information to be supplied on fair, reasonable, timely and non-discriminatory commercial terms, ensuring appropriately independently competent repairers and owner-operators have practical access to the same repair information available to authorised dealer networks

3. Digital support should extend throughout the practical operating life of agricultural machinery

Agricultural machinery is a long-term capital investment, with many producers operating machinery for decades, supported by active second-hand markets and significant reinvestment in maintenance and refurbishment.

Modern machinery increasingly depends upon embedded software, firmware, diagnostics and calibration systems to remain operational.

AgForce supports ongoing access to software updates, diagnostic systems, calibration tools and technical information throughout the practical operating life of agricultural machinery.

The premature withdrawal of digital support risks forcing otherwise serviceable machinery into early retirement, increasing business costs, reducing asset values and creating unnecessary waste.

Agricultural machinery should remain serviceable, repairable and digitally supportable throughout its practical working life, with an average tractor age in Queensland of 18.1 years¹ for broadacre cropping, and sheep and cattle operations averaging 25.1 years to 30 years plus respectively².

AgForce also supports adopting the earliest practical manufacturing cut-off date, consistent with the NFF position, recognising the long operating life of agricultural machinery and the continued reliance on older equipment across Australian agriculture.

AgForce recommends: Adopt the earliest practical manufacturing cut-off date, maximising the long productive life of agricultural machinery and recognising the significant capital investment made by producers; ensure agricultural machinery remains serviceable, repairable and digitally supportable throughout its practical working life.

4. Competency recognition should support safe repairs and competitive markets

Agricultural production is governed by biological systems, seasonal conditions and narrow operational windows. Lost production opportunities cannot always be recovered simply by delaying repairs. Machinery availability therefore has a direct influence on farm productivity, profitability and business resilience.

¹ Miller, J and Fragar, L. (2006). Rural Industries Research and Development Corporation. [*Farm Machinery Injury Involving Run-Over Report*](#).

² Industry Search (2025). Online: <https://www.industrysearch.com.au/buying-guide/used-tractor-price-guide-australia-2025-costs-buying-tips-and-finance/f/26850>



Further, Queensland producers frequently operate over vast distances from authorised dealerships, with many farming businesses relying on local independent repairers to maintain operational continuity during the production cycle.

AgForce supports arrangements that recognise repairs undertaken by appropriately recognised competency, trade qualifications, relevant industry training and demonstrated experience, or certifications, rather than manufacturer-controlled approval systems, in effort to ensure repairs are undertaken safely and competently.

Competency requirements should remain practical, affordable, reasonably accessible and proportionate to risk. They should encourage participation by skilled regional repair businesses and individuals, while avoiding unnecessary financial, administrative or regulatory barriers that restrict competition or deter capable service providers from participating in the scheme.

AgForce recommends: Improve regional and remote servicing repair capability across Australia's vast operating conditions, by extending access to repair information to recognised competent repairers or demonstrated producer experience and ensuring eligibility requirements remain reasonably practical, affordable, regionally accessible, and not used as a barrier to entry.

5. Warranty protections should reflect practical agricultural operations

AgForce acknowledges the importance of legitimate manufacturer warranty protections.

However, warranties should not be automatically invalidated where routine servicing or minor repairs are undertaken by appropriately recognised competent repairers, or machinery owners with demonstrated experience, and those repairs can later be appropriately validated and have not contributed to the subsequent equipment failure.

Examples include routine air-conditioning servicing, refrigerant replacement, hydraulic hose repairs, sensor replacement, electrical fault diagnosis, diagnostic testing or reset or other similar maintenance activities.

A balanced and reasonable approach will preserve consumer confidence, improve competition while promote appropriate manufacturer protections.

AgForce recommends: Protect manufacturer warranties where suitably competent repairs have not contributed to equipment failure and repairs can later be validated, applying a balanced and reasonable approach.

6. The legislation should remain adaptable to future agricultural technologies

Agricultural machinery and production systems continue to evolve rapidly through innovation, automation, precision agriculture, advanced telematic, autonomous and semi-autonomous machinery, robotics, artificial intelligence and other emerging digital agricultural technologies.

The Right to Repair framework should remain flexible and technology-neutral to accommodate future innovation without requiring frequent legislative amendment.

AgForce supports a broad definition of agricultural machinery that reflects modern farming systems and the evolving technology opportunities increasingly being integrated into agriculture production systems.



AgForce supports Treasury's proposal for Scheme Adviser to retain the ability to recommend additional machinery classes as technology continues to evolve.

AgForce recommends: The Right to Repair framework future proof legislation by remaining technology-neutral and adaptable, supported by an ongoing review mechanism that enables new machinery classes to be incorporated over time.

7. Right to Repair should strengthen Australia's sovereign agricultural capability

The global supply chain critical input disruptions of fuel and fertiliser earlier this year, and events of previous years, COVID-19, natural disasters etc, have highlighted Australia's dependence upon international supply chains for critical inputs to agricultural production systems to remain operational.

AgForce recognises that the proposed legislation is principally designed to facilitate access to repair information rather than regulate the commercial supply of replacement parts or machinery components.

However, access to repair information alone cannot ensure agricultural machinery can return to operations where critical replacement components remain unavailable, regardless of access to repair information.

While recognising this issue extends beyond the scope of the proposed legislation, AgForce encourages the Australian Government to consider broader competition, industry and sovereign capability policy measures that improve long-term access to critical agricultural machinery components, replacement parts and digital technologies as part of Australia's long-term food and fibre security and national supply chain resilience agenda.

AgForce recommends: The Australian Government considers complementary policy measures, to improve access to critical machinery components within a broader sovereign capability, supply chain resilience and food security agenda.

8. Formal Statutory Review:

Given the rapid pace of technological change in agricultural machinery, software systems, artificial intelligence, automation and digital diagnostics, AgForce proposes the Australian Government undertake a statutory review of the legislation within three years of commencement to evaluate whether the reforms have improved competition, reduced machinery downtime, strengthened regional servicing and repair capability and delivered practical benefits (i.e., productivity) to Australian machinery owners and producers.

AgForce recommends: The Australian Government undertake a post-implementation review of the expanded Right to Repair framework within three years of commencement to evaluate whether the legislation is working as intended and enable opportunities for further refinement.

Conclusion

AgForce supports the Australian Government's commitment to extending Australia's Right to Repair framework to agricultural machinery.

These proposed reforms represent an important opportunity to strengthen competition, improve agricultural productivity and enhance the resilience of Australia's agricultural production systems.



AgForce has offered policy guidance that is based on practical experience, is fit-for-purpose to the Right to Repair framework; focused on machinery owner, operator, producer, manufacturer; and seeks to improve access to repair information; that encourages competitive repair markets; strengthens regional servicing and repair capability; helps maximise the productive life of agricultural machinery; while maintaining appropriate safeguards for safety, cybersecurity, intellectual property and legitimate manufacturer interests.

Agricultural machinery is no longer simply a mechanical asset. It is an integrated digital production system upon which modern Australian agriculture depends. Maintaining these assets throughout their practical working life requires ongoing access to software, diagnostics, technical information and appropriately qualified repair services.

For AgForce, the guiding principle is clear:

“Agricultural machinery should remain safe, serviceable, repairable and digitally supportable throughout its practical working life.”

Achieving this outcome will improve agricultural productivity, preserve business capital, strengthen regional repair capability, support competitive repair markets and contribute to Australia's long-term food and fibre security.

Ultimately, a modern Right to Repair framework should empower machinery owners to safely maintain, repair and digitally support their machinery throughout its practical working life, ensuring Australian agriculture remains productive, competitive and resilient for decades to come.

AgForce appreciates Treasury's engagement with industry throughout this consultation process and welcomes the opportunity to continue contributing as these important reforms progress. Should you have any questions or require further information please contact Sam Forzisi by email on forzisis@agforceqld.org.au or by mobile on 0499 960 006.

Yours sincerely,

Shane McCarthy
AgForce General President



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