



Ms Jenny Wilkinson PSM
Secretary
The Treasury
Langton Crescent
PARKES ACT 2600
Email: righttorepair@treasury.gov.au
Submission via [online portal](#)

3 July 2026

Dear Ms Wilkinson

Re: Expanding Australia's Right to Repair Framework

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$21 billion waste and resource recovery (WARR) sector. With more than 2,300 members from over 400 entities nationwide, we represent its breadth and depth including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies.

As a fierce advocate of the [waste hierarchy](#) and the [10Rs framework](#) for transitioning to a circular economy, WMRR supports a systems-based approach to moving beyond end-of-life management toward the safe reinvestment of valuable materials back into the economy, in order that fewer natural resources are used for longer. Repair, recycling, reuse, recovery and remanufacturing preserve the embedded value of products, reduce demand for virgin materials, lower greenhouse gas emissions and support Australia's transition away from its current linear "take-make-dispose" economy. Australia's waste policy has traditionally focused on improving recycling and end-of-life management. While important and often the area that does the 'heavy lifting' in material productivity, recycling alone cannot deliver a circular economy. Greater emphasis must be placed "upstream" – focused on better product design that enables waste avoidance, maintenance, repair, reuse and refurbishment.

In WMRR's view and evidenced globally, this requires mandated sustainable design obligations on manufacturers supplying into the Australian market, as we see in other markets such as the European Union (EU). WMRR would also note that given that there is a comprehensive framework in the EU that a large number of manufacturers and suppliers are already adhering to, Australia should look to adopt as much of this framework as possible to provide certainty to these producers but also protections to Australian consumers. WMRR submits that Australia requires a comprehensive Right to Repair legislative framework that applies across product categories, that is integrated into broader circular economy, product stewardship and waste avoidance initiatives – all of which are founded on the principle of Extended Producer Responsibility (EPR). This would not only provide better material productivity but also regulatory certainty for the entire supply chain, facilitating improved investment and innovation.

WMRR values this opportunity to make a submission to Treasury having reviewed the [Discussion Paper](#), and broadly supports the strengthening of the Motor Vehicle Service and Repair Information Sharing Scheme (MVIS) and its extension to agricultural machinery. Moreover, WMRR strongly advocates for future extension of the

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037
(02) 8746 5000
INFO@WMRR.ASN.AU

WMRR.ASN.AU

framework beyond agricultural machinery and motor vehicles. We do however have some key concerns around the proposed restrictions on modifications, and the limitations on who may access repair information, noting the lack of owner access rights.

WMRR notes that the [Productivity Commission's 2021 Right to Repair Inquiry report](#) explicitly recognised Right to Repair as a multifaceted key policy issue, that enhanced consumer rights, enabled access to repair supplies, and improved product information and e-waste management. The report made 16 recommendations, yet the primary legislative outcome has been the MVIS, which we note still excludes some significant repair information such as telematics, parts catalogues, trade secrets and certain commercially sensitive dealer information. The expansion of the MVIS to include agricultural machinery has been prioritised, following the Commission estimating the cost of repair-access barriers in Australian agriculture at close to \$100 million a year in lost productivity, with delayed harvests and inflated service fees, and treasury citing a figure of \$97 million in additional GDP from grain output alone.

The Discussion Paper proposes a significant expansion of Australia's existing MVIS into the agricultural machinery sector, while also strengthening and modernising the existing automotive framework. The policy objective is to improve competition, reduce repair costs, increase productivity, and improve resilience in agricultural and vehicle repair markets. WMRR appreciates that manufacturers, independent repairers, equipment owners, operators and industry representatives from the agricultural sector were the primary focus for this consultation, and as such, WMRR has considered the proposed reforms as representing the beginning—not the end—of Australia's Right to Repair agenda and supports the reforms which enhance:

- access to repair information
- access to diagnostic software and tools
- independent repairer rights
- repair market competition
- access to electronic records and service histories
- restrictions on anti-competitive manufacturer practices
- reduced administration barriers
- governance and enforcement mechanisms.

WMRR provides the following comments on the proposed reforms highlighting concerns with scheme access and limitations, as well as opportunities for alignment with existing international Right to Repair frameworks.

i. Access rights for independent repairers should extend to owners (Proposal 2)

WMRR notes that the consultation does not propose broad owner access to repair information, remaining focused on "qualified repairers" rather than owners or self-repairers. This reflects a more limited "independent repair market" model rather than a broader "consumer right to repair" model. It is WMRR's view that owners should also have reasonable access to repair information, diagnostics and software required to maintain equipment they own, so long as safety and security concerns can be appropriately managed. This compliments WMRR's support for broader sustainable design principles being adopted as well as repairability labelling information, which is also based on the foundation principles of manufacturers taking lifecycle responsibility for the products they place on market and being accountable to purchasers for its durability.

ii. Allowing manufacturers to prohibit what it deems “unauthorised modifications” could undermine legitimate repairs (Proposal 3)

Treasury proposes allowing manufacturers to prohibit certain “unauthorised modifications”. WMRR submits that terms like “modification” and “repair” often overlap - particularly with modern software-driven equipment in vehicles and machinery. WMRR has concerns that:

- repair-related software access could be restricted by a manufacturer simply because it could theoretically be used for modification, and
- manufacturers may define legitimate repair activities as “modifications”.

As such restrictions may become a pathway to block repair and undermine the intent of the scheme (and the desired circular outcome of ensuring that vehicle life is prolonged). An overly broad definition may prevent diagnosis, maintenance, restoration, interoperability or lawful owner modifications. WMRR suggests this reform is carefully worded to support restrictions where necessary for genuine safety or legal compliance.

iii. Safety information reforms to reduce administrative burden are supported (Proposal 4)

WMRR understands that Treasury is considering reducing restrictions around “safety information” given the recent scheme review found the current arrangements create barriers without clear evidence of safety benefits. WMRR opposes unnecessary procedural barriers that function as de facto repair restrictions, and if risk-based analysis shows that such restrictions are not necessary, they should be reduced. Furthermore, WMRR notes that Option 2 – which removes this burden and provides enhanced regulatory guidance about obligations under the scheme –aligns more closely with the EU, US and UK wherein data sharing arrangements only restrict access to security information.

iv. Greater access for intermediaries is supported (Proposal 5)

Treasury proposes that greater access to scheme information for intermediaries (such as for tool manufacturers, data aggregators and third-party information providers) by imposing an obligation on data providers to supply scheme information in a reasonably accessible form, for a fair price not exceeding market value, as soon as reasonably practicable, and with terms and conditions that are appropriate for the context. This recognises that repair competition depends on these intermediaries such as part repairers, software providers, tool makers and information aggregators having access to information. For this reason, WMRR encourages the broad interpretation of intermediaries, however, recommends that the proposal is revised to align with the EU Framework that prescribes acceptable timelines for the supply of information to intermediaries, noting that data providers may delay though extended licencing negotiations.

v. Electronic logbooks and repair history should form part of scheme information (Proposal 6)

WMRR supports the proposal to make repair and maintenance history part of scheme information, requiring manufacturers to allow independent repairers to update electronic service records. This is strongly aligned with right-to-repair principles and ensures that independent repairers are not disadvantaged, consumers are not locked into specific manufacturer networks and that service history is preserved (potentially protecting resale value). WMRR submits this is a fundamental principle should be applied to other connected-device repair histories and service records.

Further recommendations:

Disappointingly, due to the limited scope of its application to motor vehicles and agricultural machinery, the broader legal, regulatory and market barriers to repair identified in the Productivity Commission's review are not all addressed by the proposed reforms to the MVIS. Notably:

- The repairability labelling pilot for white goods and consumer electronics — which France already has, and the EU is rolling out — has not been implemented
- Copyright reforms have not progressed to allow for the reproduction and sharing of repair information under certain circumstances i.e.: repair manuals and repair data hidden behind digital locks.
- The proposed reforms do not establish any minimum software support obligations, leaving manufacturers able to discontinue software updates, potentially rendering otherwise functional products obsolete and undermining the practical effectiveness of any Right to Repair.
- The software-update guarantee (for a reasonable period) for products with embedded software has not been legislated.
- The proposal to make failure to honour consumer guarantees a civil penalty contravention — giving the ACCC power to seek pecuniary penalties — has not been enacted.
- The ACCC market study of mobile phones and tablets recommended by the Commission has not been undertaken.

Without these complementary reforms, many of the structural barriers preventing repair will remain. As such, WMRR provides the following recommendations for Treasury's consideration as it progresses the Right to Repair agenda.

vi. Introduce a comprehensive national Right to Repair framework

WMRR supports the expansion of Australia's Right to Repair framework beyond motor vehicles and agricultural machinery to encompass a broader range of products that contribute significantly to waste generation and resource consumption. As mentioned previously, we would strongly encourage the EU Framework be adopted to provide consistency and certainty to all in the supply chain. Australia currently has no dedicated right-to-repair legislation covering consumer electronics, household appliances or other priority products, with consumers relying primarily on the general consumer guarantees contained in the Australian Consumer Law. A modern Right to Repair framework should adopt a lifecycle approach that promotes durability, repair, reuse and resource recovery while reducing waste generation. To ensure contributed progress, repair and reuse objectives should be incorporated into the *National Waste Policy Action Plan* and the federal government should work with states and territories to include measurable repair and reuse targets within waste and circular economy strategies.

Priority product categories should progressively include:

- consumer electronics
- mobile phones and tablets
- household appliances
- batteries and battery-powered products
- solar photovoltaic systems
- air conditioners and refrigeration equipment
- textiles and clothing

- products already covered by, or being considered for, product stewardship schemes.

As highlighted by the Productivity Commission's 2021 review, electronic products should be an early priority. Australia generates approximately 500,000 tonnes of electronic waste annually, equivalent to around 20 kilograms per person, almost three times the global average. E-waste generation is projected to increase by almost 30 per cent to 657,000 tonnes by 2030, and globally, e-waste generation continues to outpace recycling. Although several Australian jurisdictions prohibit e-waste from landfill, electronic products and battery-powered devices continue to enter kerbside waste collections, contributing to fires, safety risks and increased clean-up costs. Improving repairability, durability and product design would significantly reduce problematic e-waste generation.

vii. Strengthen Extended Producer Responsibility and prioritise product design as the foundation of repair
Right to Repair should become an integral component of Australia's Extended Producer Responsibility (EPR) framework. Consistent with the OECD definition of EPR, manufacturers should retain financial and organisational responsibility throughout a product's lifecycle—from design through to end-of-life management.

Repair begins with product design. Products should be designed to last longer, be easily disassembled using standard tools, allow battery replacement, provide repair manuals and spare parts, support software updates for an appropriate period and facilitate reuse, refurbishment and recycling at end of life. The *Recycling and Waste Reduction Act 2020* and *Product Stewardship Act 2011* currently focus largely on collection and end-of-life management rather than influencing product design and producer responsibility across the entire product lifecycle. This has resulted in existing stewardship schemes largely evolving into collection systems rather than genuine EPR schemes that drive product redesign, repair and reuse.

WMRR recommends:

- expanding the objectives of the *Product Stewardship Act 2011* to explicitly include durability, repairability, reuse and circular product design
- integrating Right to Repair obligations into Australia's *Recycling and Waste Reduction Act 2020*
- requiring stewardship schemes to include repair and reuse targets
- requiring manufacturers to provide repair manuals, spare parts and diagnostic tools
- ensuring producers remain responsible for product take-back and end-of-life management.

Mandatory EPR inclusive of design requirements would internalise lifecycle costs, create market incentives for better product design, fund end-to-end collection and recycling infrastructure, and eliminate the free-rider problems experienced under many voluntary stewardship schemes. WMRR supports aligning Australia's product design requirements with international Ecodesign frameworks (such as the EU) and discouraging planned obsolescence through regulation, including consideration of restrictions on importing or manufacturing products intentionally designed for premature failure.

viii. Improve consumer information through repairability labelling
Consumers currently have limited ability to compare products based on durability or repairability. WMRR supports introducing a national Repairability Index (such as that implemented by France) mandating repairability and durability information at the point of sale and disclosure of expected product lifespan and



information regarding consumer guarantee rights. This approach could build on Australia's existing energy rating label framework and aligns with recommendations previously made by the Productivity Commission.

Repairability labelling would encourage manufacturers to compete on product durability while enabling consumers to make informed purchasing decisions and complement mandatory design standards and EPR.

ix. Support repair through economic incentives

Legislative reform should be complemented by financial measures that make repair economically competitive with replacement. WMRR supports consideration of:

- repair rebates for household products
- tax incentives for repair businesses
- manufacturing grants supporting repairable and circular product design
- procurement policies favouring durable and repairable products
- use of waste levy revenue to support repair, reuse and remanufacturing initiatives
- funding for repair cafés, repair infrastructure and remanufacturing facilities.

These measures would strengthen Australia's repair economy while reducing waste generation and supporting domestic employment.

x. Align Australia with international best practice

Australia should align its Right to Repair reforms in so far as possible with international developments to ensure Australian consumers receive products meeting contemporary global standards. France has implemented a mandatory Repairability Index, while the European Union is introducing comprehensive Ecodesign and Right to Repair legislation across numerous product categories. Several United States jurisdictions have also legislated broad repair rights extending well beyond automotive products. WMRR supports aligning priority product categories with the EU Ecodesign framework, recognising overseas repair and durability standards for imported products where appropriate, and adopting internationally consistent repairability requirements. Without alignment, Australia risks becoming a destination for products that fail to meet overseas repairability standards.

WMRR trusts that our comments on expanding Australia's Right to Repair framework will be given due consideration for both this consultation, and as further work progresses. Please contact the undersigned if you wish to discuss WMRR's submission.

Yours sincerely

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037
(02) 8746 5000
INFO@WMRR.ASN.AU

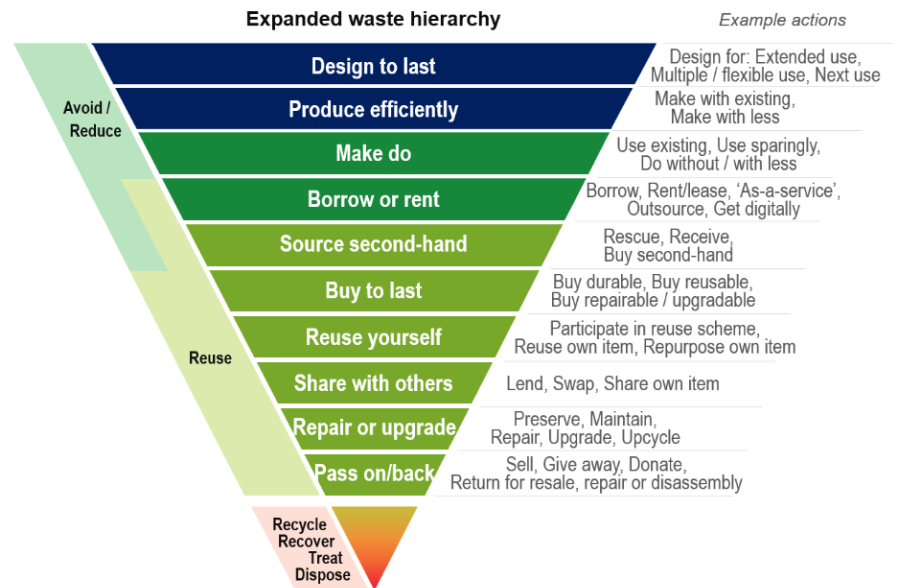
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References:

The Waste Hierarchy

(source: [DCCEEW](https://www.dcccew.gov.au/))

The waste hierarchy framework places additional focus on waste prevention efforts with the most favourable options at the top of the hierarchy diagram.



The 10Rs Framework

(source: [DCCEEW](https://www.dcccew.gov.au/))

