



December 2, 2025

Honourable RJ Sigurdson
Minister of Agriculture & Irrigation
131 Legislature Building
Edmonton, AB
Via email: AGRIC.Minister@gov.ab.ca

Honourable Dale Nally
Minister of Service Alberta and Red Tape Reduction
103 Legislature Building
Edmonton, AB
Via email: ministersa@gov.ab.ca

RE: Follow-up to Strengthening Consumer Protection Engagement – Modernizing the *Farm Implement and Dealership Act* (FIDA)

Dear Minister Sigurdson and Minister Nally,

Team Alberta Crops (TAC) is following up on our written submission to Service Alberta and Red Tape Reduction's (SARTR) Strengthening Consumer Protection engagement that was provided on October 3, 2025 (included). We appreciated the opportunity to participate in this process and understand that SARTR is now considering how provincial policy can better support repairability and interoperability for Albertans.

In fall 2024, the passage of federal Bill C-244, *An Act to amend the Copyright Act* (diagnosis, maintenance and repair) and Bill C-294 *An Act to amend the Copyright Act* (interoperability) introduced exemptions that now allow farmers to bypass technological protection measures (TPMs), also known as digital locks, allowing them the legal right to run diagnostic software, perform repairs like replacing parts and maintain their own equipment, as well as hire third party technicians to perform these functions.

While these changes were a step in the right direction towards increased repair autonomy for farmers, there is now work that needs to be done at the provincial level to explicitly enshrine the right to repair and interoperability protections for farmers. For instance, federal changes did not obligate manufacturers to provide the manuals, tools or software needed to complete timely repairs, nor did it resolve warranty and licensing work-arounds. Despite this progress, TPMs still effectively block independent repair by requiring proprietary software to investigate issues and 'authorize' changes even after mechanical work is complete.





While we appreciate the work being undertaken by SARTR focused on enabling consumer right to repair and protection, our engagement has highlighted a critical jurisdictional gap, since most of the farmers that Team Alberta Crops represents operate as businesses and would likely fall outside of the scope of the *Consumer Protection Act*. As such, to ensure that farmers are protected, we would like to ensure that the Government of Alberta as part of the engagement considers amendments to the *Farm Implement and Dealership Act (FIDA)* to explicitly enshrine right to repair and interoperability protections for farmers in provincial legislation.

Team Alberta Crops, with the support of the Intensive Livestock Working Group and the Farmers' Advocate Office, conducted a comprehensive survey of Alberta producers from June to October 2025 to determine the extent and severity of difficulty farmers face in repairing their equipment. Below are some key findings from the 134 respondents:

- **Widespread Impact:** Respondents represent 75% of rural municipalities in Alberta, confirming this issue is not isolated to specific regions. **72%** of producers indicated facing difficulties with repairing their equipment in a timely and cost-effective manner.
- **An Industry-Wide Issue:** The data confirms that repair restrictions are not limited to a single manufacturer. Respondents reported significant challenges across all major brands, including John Deere, Case, New Holland, and others. This is an industry-wide issue that requires a legislative solution.
- **The "Reliability Paradox":** A recurring theme is that while modern equipment is mechanically robust, it is digitally fragile. Farmers report that newer machines are less reliable than older ones, not because of mechanical failure, but because minor sensor faults trigger total shutdowns that only a dealer can reset.
- **Critical Downtime:** The survey revealed that **78% of repair delays occurred during critical periods** (such as seeding and harvest). In addition, **repairs took about 7 days to fix**, which includes getting a technician on-site, obtaining the right parts and then finally fixing the issue.
- **Hidden Information:** The majority of respondents shared that they did not know that diagnostic software could be obtained from their dealership. Despite legislative advances at the federal level to the *Copyright Act* permitting farmers the ability to run diagnostics and perform repairs, the inability to obtain adequate instructions supports an expensive repair monopoly.
- **Lack of Interoperability:** Over **50% of producers** reported that they operate equipment that would benefit from interoperability but currently face software blocks. Farmers are being forced to buy redundant monitors and expensive unlocks just to make a tractor talk to a seeder.
- **Modernized Scope of Equipment:** Update the definition of "farm implement" and remove outdated thresholds in the *Farm Implement Regulation* (specifically the \$10,000 price limit and 30 hp limit) that inadvertently exclude critical modern technology. The legislation could be expanded to cover essential equipment like grain dryers and grain handling equipment, and consider adding emerging technologies like drones, autonomous robotics, and electric machinery.





Farm machinery repairs and other related expenses are the fourth largest operating expense for farmers, with costs increasing 152 per cent over the past two decades. In addition to cost, farmers often face repair monopolies in many regions of the province as well as added cost issues with equipment and software obsolescence. Improvements to provincial legislation through *FIDA* could address gaps to prevent limiting access to diagnostic software and ensuring affordability for farmers in accessing software and services to diagnose, repair and maintain equipment.

We are calling for targeted amendments to *FIDA* that addresses the following specific issues:

1. **Repair Choice:** Farmers should be able to choose owner, independent, or dealer repair without losing lawful functionality.
2. **Access to Documentation:** should be posted online at no charge, with printed copies available at cost, so owners and independent technicians can adequately respond during a breakdown.
3. **Tools & Software:** Requiring timely access to diagnostic software and security resets.
4. **No Parts Pairing:** Prohibiting software that artificially limits third-party parts.
5. **Fair Terms:** Ensuring access without burdensome restrictive contracts.
6. **Enforcement:** build on Alberta's existing approach for farm implements so remedies are practical and aligned with how agriculture operates.
7. **Interoperability:** Require manufacturers to provide the technical information, interfaces, and updates needed for attachments, third-party systems, and mixed-brand equipment to work safely and reliably together.

Team Alberta Crops is an active member of CanRepair, a coalition of businesses, legal experts, and industry groups advocating for legislative reform to protect consumer repair rights. CanRepair has drafted the enclosed **Model Agricultural Equipment Right to Repair Bill** for consideration. We support using this model as a starting point for Alberta's modernization of *FIDA* as we feel that the text reflects the reality of how farm equipment is sold and serviced in Alberta and also includes elements related to interoperability. Updating *FIDA* to now reflect the digital reality of modern equipment will protect Alberta farm families from unreasonable downtime and costs, increase competition, enhance rural service capacity, and ensure that farmers can maximize their productivity by avoiding harmful delays.

We would welcome an opportunity to discuss this further and provide input to the ongoing engagement or discuss the modernization and potential amending of the *Farm Implements and Dealership Act*. Please reach out to Jasen Aussant at [email] or at [phone] to coordinate a meeting.

Sincerely,





Alison Davie, Chair, Potato Growers of Alberta

Andre Harpe, Chair, Alberta Canola

Curtis Miedema, Chair, Alberta Beekeepers
Commission

Gary Tokariuk, Chair, Alberta Sugar Beet Growers

Sarah Weigum, President, Alberta-BC Seed
Growers

Scott Jespersen, Chair, Alberta Grains

Shane Strydhorst, Chair, Alberta Pulse Growers

CC: Farmers' Advocate Office

Team Alberta Crops is a collaboration between seven of Alberta's producer groups. We work together to advance grass-roots policy and advocate on behalf of Alberta's crop and beekeeping sectors.

