



18 September 2025

The Productivity Commission
via email: 5pillars@pc.gov.au

Re: NFF submission to Productivity Commission's Harnessing data and digital technology inquiry interim report

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the Productivity Commission's (PC's) inquiry into *Harnessing data and digital technology*, following the release of the interim report.

The NFF is the voice of Australian farmers and was established in 1979 as the national peak body representing farmers and the agriculture sector more broadly, across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Executive Summary

Australian farmers rely on digital technologies and farm data to drive productivity, manage risk, demonstrate sustainability, and respond to evolving market expectations. The NFF's 2030 Roadmap highlights that data is a critical enabler of agriculture's growth, provided that farmers retain appropriate control and share fairly in the value it generates.

The NFF strongly supports the PC's draft recommendation to establish lower-cost, more flexible regulatory pathways for expanding basic data access, including industry-led access codes and standardised data transfers. With strong links to the Australian Farm Data Code, these reforms have the potential to lift productivity, enhance competition, and strengthen Australia's international competitiveness at relatively low cost. We particularly welcome the PC's recognition of agriculture as a sector well positioned to benefit from these reforms.

The NFF urges the PC to consider a combination of regulatory reform and practical support in order to establish a coordinated, farmer-first data access environment in Australia. The NFF recommends that:

- The Australian Government establishes new pathways for expanding basic data access via industry-led codes and standardised data transfers;
- The Australian Government extends right to repair provisions to agricultural machinery, enabling farmers and third-party repairers' access to requisite data and information to fix or maintain farm machinery;



- The Australian Farm Data Code is supported to increase the benefits it delivers to Australian farmers and its value proposition for certified providers; and
- Critical investment is made, by both industry and governments, in connectivity, digital literacy and extension services to ensure farmers can use their data to drive productivity and sustainability.

Farm Data in Australian Agriculture

Australian farmers utilise digital agriculture and farm data to lift productivity, manage risk, improve sustainability, and respond to changing market expectations. Farm data commonly informs farmers' decision-making around soil health, crop yields, weather patterns, livestock management, and operational performance.

Improved on-farm connectivity, coupled with farmers' increasing uptake of diverse digital technologies, is producing unprecedented volumes of data about farm businesses. As the collection and reliance on farm data continues to grow across the industry, farm data will become increasingly valuable. Data ownership, access, control, and security are becoming critical issues for farmers. The NFF supports that the management and regulation of farm data must ensure farmers have appropriate control of their data and receive a fair share of the value derived from it.

Importantly, co-existing challenges may prevent farmers from unlocking the full productivity potential of farm data, including:

- Connectivity gaps that constrain the adoption of AgTech and data-driven decision-making.
- Digital literacy and skills gaps that may limit farmers' ability to interpret and integrate data.
- The need for extension and advisory support to translate new data flows into practical business improvements.
- Costs of upgrading on-farm systems, which can place reforms out of reach for many businesses.
- Ongoing concerns about privacy, sovereignty, and control of data generated on farm.

NFF Policy Foundations

- The NFF 2030 Roadmap (the Roadmap) outlines Australia's vision to become a \$100 billion industry by 2030, and is [available here](#).



- To achieve the \$100 billion industry vision, the Roadmap supports that action is required to:
 - ensure farmers have ultimate control of their data and the value derived from it;
 - support frameworks for seamless exchange of industry data across the value chain; and
 - build the industry's capacity to take advantage of connectivity and digital farming practices.
- The NFF Connectivity and Digital Agriculture Policy (November 2023) supports that farm data must be subject to best practices surrounding its collection, use, control, and sharing. The policy is [available here](#).
- The Australian Farm Data Code (AFDC) provides an industry-led framework for fair and transparent management of farm data, with a demonstrated impact in improving provider practices. For example, providers have changed their Terms and Conditions to meet certification requirements under the Code. More information is [available here](#).
- The Australian Agricultural Sustainability Framework (AASF) reinforces the growing importance of trusted, reliable, accessible and interoperable data to support escalating sustainability and ESG reporting demands. The AASF I CSIRO Data Ecosystem Design 'From Anarchy to Order' Final Report 2025 is [available here](#).
- The NFF Competition Policy (2022) supports the need to expand legislated right to repair provisions to agricultural machinery. The NFF's latest commentary on agricultural Right to Repair is [available here](#).

PC's Interim Report Recommendations

New pathways to expand data access

The NFF strongly supports the PC's recognition of agriculture as a sector where better data access could generate large benefits for relatively low cost.

The NFF supports the interim report's recommendation that the Australian Government should enable new pathways for individuals and businesses to access and share data relevant to them. For agriculture, this is particularly important in relation to:

- Agricultural machinery and equipment data: Standardised data transfers could deliver major productivity benefits, provided industry is consulted on minimum technical standards and pathways remain adaptable to new technologies. The NFF supports the PC's recognition that this reform may enable farmers to combine real-time data feeds from their machinery and equipment to optimise their operations and easily switch between different manufacturers.



- Australian Farm Data Code (AFDC): The AFDC is an exemplar industry-led data access code which has tangibly improved providers' practices. Standardised data transfer pathways would improve compliance with AFDC requirements. Support must be given to facilitate further adoption by providers operating in the Australian market.
- Farm sustainability data: Farmers are under increasing pressure to capture data to demonstrate ESG performance. Access to trusted, interoperable, and reliable data is essential to meet these demands efficiently and fairly. Appropriate governance and agreed registers of how and what data to collect require further work and must be resolved in a collaborative and robust manner.
- Right to Repair for agricultural machinery: Data access reforms are inextricably linked to broader Right to Repair reforms. Without guaranteed access to machinery diagnostics and technical data, farmers remain dependent on a narrow set of authorised repairers, limiting competition and increasing costs. Enabling data access within Right to Repair frameworks will give farmers genuine choice, strengthen service competition, and improve productivity. As the PC's own modelling has shown, these reforms could add more than \$400 million to GDP through a combination of improved farm output and increased competition in the repair sector.

Additional information from NFF members

The NFF urges the PC to consider the detailed positions of NFF members for further information and context, including the NFF Horticulture Council's policy position on [data sovereignty and use](#), and NSW Farmers' positions on farm data, Artificial Intelligence and Right to Repair.

Conclusion

The NFF thanks the Productivity Commission for the opportunity to make a submission on the interim report of the inquiry into *Harnessing data and digital technology*.

The policy contacts for this matter are Charlotte Wundersitz, General Manager, Rural Affairs, via email: cwundersitz@nff.org.au, and Zac Rayson, Senior Policy Officer, Rural Affairs, via email: zrayson@nff.org.au.

Kind regards,

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Interim Chief Executive