



25 August 2025

The Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

Via: OFCP@infrastructure.gov.au

Re: On Farm Connectivity Program Round 3 consultation

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (the Department) regarding the *On Farm Connectivity Program Round 3* (the Program, OFCP).

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.

Connectivity and digital agriculture are intrinsically linked, with connectivity advancements underpinning the adoption of digital agricultural practices. As connectivity continues to advance, the growth of digital agriculture in areas such as automation, digital intelligence and farm data will present increasing opportunities for Australian farmers.

The NFF strongly supports the OFCP, evidenced in our <u>media release</u> welcoming the Round 3 announcement. The NFF views the Program as a key mechanism to address the significant and often prohibitive cost of connectivity for Australian farmers and, in turn, a key mechanism to boost the sustainability and productivity of the agriculture sector. The NFF encourages the Australian Government to commit to ongoing funding for the Program, given its overwhelming success to date.

In considering proposed design changes to the third round of funding, the NFF makes the following comments and recommendations.

4. Proposed design changes

4.1 Communicating with you

- 1. How does the time taken between the announcement of a round and it opening for applications impact you?
- 2. How far in advance would you like to be advised of the Program opening?



3. What is your preferred method of contact to be notified about key dates and announcements?

The NFF and its members can assist the Department to communicate key dates and announcements about the Program to primary producers.

Notification of the opening of the program should prioritise fairness and equitable access, allowing farmers appropriate time to understand the Program's requirements and prepare an application.

In selecting dates for announcing and opening upcoming Program rounds, the NFF also urges the Department to consider peak production periods for farm businesses, such as harvest, where farmers may be too time-poor to apply for the Program.

The NFF foresees a scenario whereby specific commodities or geographical regions, who are in harvest, may be disadvantaged in the Program application process when compared to other commodities or regions which are not in harvest. This may distort program accessibility and uptake.

4.2. Primary producer rather than supplier applications

- 1. Are there any barriers to you completing an online application via the Hub's portal?
- 2. Do you consider that removing approved equipment suppliers in Round 3 will increase the range of choice for primary producers, in making purchases of connectivity equipment?
- 3. For applications that are approved, what are the possible impacts on your business making full payment of purchased equipment up front prior to receiving a rebate?
- 4. Do you agree the minimum purchase amount for the rebate of \$2,000 and maximum threshold of \$60,000 are appropriate?

The NFF notes the proposed change to primary producers, rather than equipment suppliers, submitting applications to the Program. Importantly, effective communication by the Department to primary producers will be essential to ensuring this change does not adversely impact Program participation and outcomes.

The NFF believes the minimum purchase amount of \$2,000 may pose a barrier to program accessibility, particularly for smaller businesses or those seeking to implement incremental upgrades to connectivity on-farm.



As previously supplied to the Department, there are a range of connectivity solutions that address key connectivity gaps that fall under the \$2,000 minimum spend.

Three useful examples of typical cost scenarios are:

- A Cel-Fi GO mobile signal repeater kit with external Yagi antenna kit: \$1,000 \$1,400
- A 4G LTE router with MIMO antenna and mounting gear for house: \$800 - \$1,500
- A point-to-point wireless bridge to connect two buildings: \$400 \$1000.

The NFF considers such connectivity solutions to have similar potential in terms of increasing productivity, safety and sustainability as more expensive solutions. That is, small farms may require just one primary connectivity solution to realise substantial benefits yet are currently excluded from accessing the Program. Even if the upfront cost of purchasing equipment may be lower, for smaller or lower-income enterprises this can still pose a sizeable barrier to the uptake of digital solutions.

The NFF believes that a lower minimum spend, such as \$1,000, would result in more farmers accessing the Program and, ultimately, receiving the benefits of addressing key connectivity gaps. Further, a lower minimum spend may enable applicants to purchase connectivity solutions that best meet their needs and/or encourage farmers to implement progressive upgrades over time.

The NFF urges the Department to consider reducing the minimum spend threshold from \$2,000 to \$1,000 – or even further – to more appropriately align with the varied costs of basic connectivity equipment and increase Program accessibility.

4.3 Eligible Equipment

- 1. Are there any connectivity solutions or equipment not in the attached proposed list of eligible equipment, that you think should be included?
- 2. What do you see as the most significant barriers to connectivity on your farm?
- 3. Would you expect you may require assistance from someone other than your local supplier to assess your current connectivity equipment needs?
- 4. Do you know who to talk to about your connectivity equipment needs?

The NFF acknowledges that the proposed scope of eligible equipment for Round 3 has been significantly tightened to better meet the policy intent of the Program – with eligible equipment now limited to equipment which can "directly support or enhance connectivity" as per the Discussion Paper. The NFF recognises the necessity of this change given the overwhelming interest in and subsequent



oversubscription of Round 2. The NFF believes that the types of equipment that are now proposed to be excluded from Program eligibility can deliver excellent value to farmers, the community and the Australian economy by uplifting productivity, improving safety, and enhancing sustainability. However, the NFF understands the proposed narrowing of eligible equipment deemed in scope is appropriate and will more closely align with the Program's aims and objectives.

To ensure best-fit connectivity solutions are adopted through the Program, the NFF strongly supports the provision of independent, free and trusted connectivity advice. To date, this role has been assumed by the Regional Tech Hub (RTH) through its On Farm Connectivity Information Service. Such a service, including information webinars, factsheets, use cases, as well as the provision of expert advice through the 1800 hotline and other communications pathways, is invaluable in encouraging the uptake of best-fit connectivity solutions – and therefore supporting the Program to effectively meet its objectives as well as delivering improved outcomes for producers.

Should Round 3 require primary producers to apply for Program funding, instead of suppliers, independent, readily available support will be even more important. Producers will likely require a much higher level of assistance than in previous rounds to navigate the Program application process and address any questions around eligible equipment, price caps and reporting requirements. Suppliers may also receive additional calls from producers, seeking assistance to complete the application.

The NFF strongly supports that the RTH should continue delivering this vital service in support of the Program, with the backing of the Department.

4.4 Packaging of equipment

- 1. What impact would the above approach have on primary producers' purchasing behaviour?
- 2. Is there an instance where equipment sold as a package cannot be broken down into individual eligible components to support the application process?

4.5 Pricing

1. What impact do you expect the proposed pricing arrangements may have for you?

The NFF anticipates that the market research required to set well-informed and reasonable price caps for all eligible connectivity equipment will be significant. The range of different products and associated pricing within each equipment category may be incredibly broad (e.g. WiFi mesh systems). Pricing caps should not be prohibitive for farmers seeking to use the Program to reasonably address a legitimate connectivity gap or need. This outcome would undermine the Program's objectives.



4.6 Geotagging of equipment purchases over \$10,000

- 1. Do you know how to supply geotagged photographic evidence?
- 2. Do you see any barriers to providing geotagged evidence of equipment over \$10,000?
- 3. Would you prefer having an option to submit a statutory declaration rather than a geotagged photo?

Importantly, the NFF has heard no reports of Program participants misusing program funds. However, the NFF supports the use of geotagged photographic evidence to confirm equipment over \$10,000 has been installed appropriately. The NFF has heard from farmers and suppliers of difficulties in supplying such evidence to the Department in Round 2. This includes technical difficulties around uploading photographs, as well as onerous requirements of providing additional latitude and longitude information in some scenarios. If photographic evidence of installation is required in Round 3, clear and simple instruction should be provided to Program participants as to how to gather the necessary information, and there must be an accessible, reliable mechanism for supplying the photographs to the Department.

It is essential that consideration must be given to varying installation timeframes and other barriers to installation of equipment. That is, the previous requirement to provide photographic evidence of installation within 100 days should be reasonably flexible to accommodate participants who can demonstrate they are waiting for delivery or installation, or have another reasonable explanation for failing to install the connectivity solution within 100 days.

4.7 Installation and delivery costs

- 1. What effect would the introduction of this proposed cap on installation cost have on your ability to purchase a connectivity solution?
- 2. If you believe delivery and installation costs should be more than 15% of the total purchase price of a connectivity solution, why?

The NFF is concerned that the proposed cap on delivery and installation costs of 15% of total cost could constitute a major barrier to equitable access to the Program. For producers in remote and extremely remote locations, delivery and installation costs are typically greater (and often vastly greater) than in regional or rural areas. These increased costs pose an existing obstacle to the adoption of connectivity solutions. Introducing a heavily restrictive cap on installation costs (as proposed) may further disadvantage such producers. This is especially the case for lower-income enterprises, who may have less financial capacity to pay required installation costs if they are not appropriately covered by the Program.



Further, installation of connectivity equipment can be an inherently risky activity requiring specialised skills. The NFF is concerned that the introduction of the proposed restrictive cap on installation costs could result in an unintended perverse outcome of producers opting to self-install equipment which in some circumstances could increase safety risks.

Any restriction on installation costs should not disfavour remote producers – who indeed are often the most disadvantaged by connectivity gaps. The NFF urges the Department to consider altering the proposed cap on installation costs, ensuring that any cap reflects the varied, actual, and complete costs of connectivity in regional, rural and remote Australia. Any cap on installation costs must not impede equitable access to the Program and the benefits it provides.

The Department could consider a cap tailored to location – and therefore relative installation costs – or an exemption from the cap upon the provision of multiple installation quotes as part of the grant application process as proof that installation costs *must* exceed the 15% cap.

CONCLUSION

The NFF reiterates our strong support for the OFCP and its success in supporting the adoption of connectivity solutions by primary producers.

The NFF thanks the Department for the opportunity to make a submission on proposed changes to Round 3 of the On Farm Connectivity Program.

We urge the Department to also consider the submissions of fellow agriculture industry organisations including the NSW Farmers' Association.

The policy contact for this matter is Mr Zac Rayson, Senior Policy Officer (Rural Affairs), via e-mail: zrayson@nff.org.au.

Regards,

David Jochinke

President, National Farmers' Federation

