

Farm Data Code

Summary Audit Report for Australian Wool Traceability Hub



Provider: Australian Wool Testing Authority

Assessed against Farm Data Code version: 2.0

Published Date: 11/05/2026

Expiry Date: 11/05/2027

Audit Number: 0012

Transparency

✓ 1.1 ✓ 1.2 ✓ 1.3 ✓ 1.4 ✓ 1.5 ✓ 1.6

Fairness

✓ 2.1 ✓ 2.2

Control

✓ 3.1 ✓ 3.2 ✓ 3.3 ✓ 3.4 ✓ 3.5

Portability

✓ 4.1 ✓ 4.2 ✓ 4.3 ✓ 4.4 ✓ 4.5 ✓ 4.6

Security

✓ 5.1 ✓ 5.2 ✓ 5.3 ✓ 5.4 ✓ 5.5

Compliance

✓ 6.1 ✓ 6.2

Summary of terms

What Farm Data, or other data about the farmer or farm business is being collected, created, aggregated, used, or shared?

Farm Data: grower business data, shearing data from Woolclip, wool traceability data (sale/purchase information (excluding price), wool movements), wool quality information

Other data about the Farmer or their farm/business: Personal Information

Why is this being done?

Farm Data: Wool traceability, enable Emergency Animal Disease Outbreak responses; provide profile information of parties involved in the wool supply chain; facilitate the verification of an Integrity Scheme membership; and administrative and reporting functions within the AWTH.

Other data about the Farmer or their farm/business: Personal information is used to operate the AWTH, to satisfy legal requirements.

Who is the Provider sharing Farm Data with?

Farm Data can be shared with the Chief Veterinary Officer. Farm Data can also be shared with the Sellers of a Growers Wool and the Buyer. Any industry report will de-identify Grower information ensuring it cannot be traced back. Privacy policy refers to personal data.

Is Farm Data being de-identified?

Where appropriate, AWTH will aggregate or anonymise information and data provided by AWTH users for research and analysis of the industry for the benefit of the industry. This research and analysis may be conducted by AWTH or third parties.

How long is Farm Data stored for?

Personal Information and Shared Data entered by growers can be requested to be deleted when the grower requests service termination. Transformed Data, which is de-identified Shared Data, will be stored in separate tables, and is not deleted upon service termination. Shearing test data obtained from the testing authority (AWTA) will not be deleted upon service termination unless requested by the Selling agent.

How can farmers obtain a copy of their Farm Data?

This will be requested through 'contact us' and manually extracted. It will be in a .csv format.

How can farmers get Farm Data deleted?

Personal Information and Shared Data entered by growers can be requested to be deleted when the grower requests service termination.

In which countries is Farm Data stored or made available?

All farm data is stored and backed up in Australia and Europe

What's in it for the farmer, and for the Provider?

Farmer: market access through provenance assurance, biosecurity risk management

Provider: Industry biosecurity risk management, able to support the Australian Wool industry.

Are there any risks or detriments that may affect farmers?

As advised in the User Services Agreement, the data may be provided if legally obliged to. A functional change to the application is another example. The Steering committee defines this and is well represented with Wool Producers Australia and AWI representing Growers.

Detailed compliance report against Farm Data Code

Transparency

Transparent, clear and honest collection, use and sharing of Farm Data. Providers will:

Data Code Principles



1.1



1.2



1.3



1.4



1.5



1.6

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Transparency

1.1

Provide Farmers with plain-English, easily found terms and associated policies for data collection, use, and sharing detailing:

- the identity of the contracting party/ies;
- what Farm Data and any other data about the Farmer or their farm/business, will be collected, created, aggregated, used, or shared;
- purpose/s for which Farm Data is being collected, used and shared;
- the value being created for the Farmer, and the Provider;
- how Farm Data will be managed and shared, in terms of security, access, and de-identification protocols;
- identity and/or nature of any other entities with whom it shares Farm Data;
- processes and conditions for data retention, data retrieval, and service termination; and,
- any risks or detriments that may adversely affect Farmers who share data with the Provider.

Meets the code?



Yes

Provider's comment

This is provided through the Privacy Policy, Terms of Use (ToU), User Service Agreement (USA) and Frequently Asked Questions (FAQs)

Detailed compliance report against Farm Data Code

Transparency

1.2

Obtain clear, fully informed, and express consent from the Farmer as to the terms for collection, use, and sharing of Farm Data.

Meets the code?



Yes

Provider's comment

Growers consent to the Privacy Policy, Terms of Use, and User Service Agreement upon registration in the system

Detailed compliance report against Farm Data Code

Transparency

1.3

Provide prompt notice about any material changes to the terms and associated policies for collection, use, and sharing of Farm Data.

Meets the code?



Yes

Provider's comment

If there are any changes to the ToU, Privacy Policy or User Service Agreement, a user will need to accept the new terms upon next login. We will email users ahead of time before new terms take effect.

Detailed compliance report against Farm Data Code

Transparency

1.4

Where a material change to terms and associated policies is proposed, obtain clear, fully informed, and express consent for the Farmer to accept the change and; provide an avenue for the Farmer to terminate the agreement without incurring a financial penalty and with adequate time to port or delete their Identifying Farm Data.

Meets the code?



Yes

Provider's comment

The version and date accepted is captured in the database. For any change in the PP, ToU or USA, before next login a user will need to accept. This will be logged in the database.

If a user does not agree with new terms they can give notice to terminate as per the USA.

Detailed compliance report against Farm Data Code

Transparency

1.5

Provide a mechanism for Farmers to enquire about the collection, use, storage, security and sharing of Farm Data.

Meets the code?



Yes

Provider's comment

Users to contact the privacy officer or AWTH administrator through 'contact us' function.

Detailed compliance report against Farm Data Code

Transparency

1.6

Notify Farmers of the legal jurisdiction in which Farm Data is stored or made available.

Meets the code?



Yes

Provider's comment

All farm data is stored and backed up in Australia and Europe.

Detailed compliance report against Farm Data Code

Fairness

Fair and equitable use of Farm Data.
Providers will:

Data Code Principles



2.1



2.2

Detailed compliance report against Farm Data Code

Fairness

2.1

Ensure that Farmers get value from the use of Farm Data – including products and insights derived from it.

Meets the code?

Yes

Provider's comment

The AWTH offers a number of key value propositions to the wool industry. It will:

1. Reduce the likely commercial impact on participating Growers, Sellers and Buyers of an embargo on wool movements, sheep quarantine and related restrictions imposed by the CVO following an EAD outbreak
2. Establish confidence in overseas markets that an EAD outbreak in Australia can be effectively contained and managed such that the risk to our global supply chain is minimised.
3. Enable access to export markets by providing provenance assurance, transparency and reputation, giving Australian wool a competitive advantage in a marketplace increasingly subject to scrutiny of production and supply chain practices.
4. Provide opportunities for improvements in operational efficiency and services through the centralised aggregation of data and wider integration with other service providers and products.

Detailed compliance report against Farm Data Code

Fairness

2.2

Ensure that Farm Data is not used to the detriment of Farmers without their clear, fully informed, and express consent.

Meets the code?



Yes

Provider's comment

Permitted purpose is available and any changes are to be communicated to a Grower in advance.

Ref: Clause 8 of User Service Agreement.

Detailed compliance report against Farm Data Code

Farmer Control

Ability to control and access Farm Data.
Providers will:

Data Code Principles



3.1



3.2



3.3



3.4



3.5



Detailed compliance report against Farm Data Code

Farmer Control

3.1

Ensure the Farmer has control over who can access and use their Identifying Farm Data.

Meets the code?



Yes

Provider's comment

AWTH users are able to make their organisational information either private or public.

This means that:

- Organisational information will not be identifiable in any aggregated data.
- Users will only be able to see data specific to their organisation and data that other registered users have explicitly chosen to share within the platform.
- The content users see on AWTH will be based on their role within the wool industry. This means that what a woolgrower sees will be different to what a wool seller or wool buyer will see.
- Users may provide their connections with the ability to access information regarding their wool growing enterprise.

The AWTH has prepared a Data Flow and Visibility infographic to help users understand how data is collected and shared within the platform.

Detailed compliance report against Farm Data Code

Farmer Control

3.2

Take all reasonable steps to ensure any other entities permitted access to Farm Data are bound by the terms agreed between the Provider and Farmer, and do not contravene the provisions of this Code. This does not include entities nominated by the Farmer for data sharing purposes. Inform the Farmer where terms have not been fully passed on, or Code isn't complied with.

Meets the code?



Yes

Provider's comment

All Growers, Sellers and Buyers who use this system are to agree to the PP, ToU and USA.

Chief Veterinary Officer - are able to get identifiable farm data, down to a grower level, only if requested for legal reasons e.g. biosecurity requirements.

Detailed compliance report against Farm Data Code

Farmer Control

3.3

Provide a mechanism for the Farmer to request corrections to Farm Data.

Meets the code?



Yes

Provider's comment

Farm data is either maintained directly by a Grower or supplied externally through a 3rd party system not controlled by AWTH. If there is a correction to be made, it would either be done by the Grower directly through their access or they would need to contact Woolclip support who provided the incorrect data on their behalf. AWTH has no authority in Woolclip. Any resubmitted data will overwrite historic data.

A farmer will always have an option to contact the Administrator for support.

Detailed compliance report against Farm Data Code

Farmer Control

3.4

Ensure Identifying Farm Data and any other data provided by the Farmer to the Provider, is not deleted without the Farmer's authorisation during any agreed or legally required data retention period.

Meets the code?



Yes

Provider's comment

We reserve the right to review users' Content from time to time and we reserve the right to remove any of your content if we feel that it is not appropriate, or offensive.

As per the User Service Agreement, notice will be given about what data is being purged and when.

Detailed compliance report against Farm Data Code

Farmer Control

3.5

Take all precautions to avoid identification or re-identification of a farm or Farmer from de-identified data, without the Farmer's clear, fully informed, and express consent.

Meets the code?



Yes

Provider's comment

Identifiable customer information and Farm Data are stored in separate databases.

All Test and Dev systems will be obfuscated where possible and reasonably to do so.

Every 6 months an audit to take place who has access to data.

Detailed compliance report against Farm Data Code

Portability

Ability to obtain and delete Farm Data.
During any agreed and legally required data
retention period. Providers will:

Data Code Principles



4.1



4.2



4.3



4.4



4.5



4.6



Detailed compliance report against Farm Data Code

Portability

4.1

Provide Farmers and/or their nominees with the ability to obtain all Identifying Farm Data (both raw and/or processed) in a structured and frequently used machine – or human-readable format where technically feasible.

Meets the code?



Yes

Provider's comment

This will be requested through 'contact us' and manually extracted.

It will be in a .csv format.

Detailed compliance report against Farm Data Code

Portability

4.2

Provide documentation to make ported data usable, e.g. Application Programming Interface (API) documentation and data model diagrams.

Meets the code?



Yes

Provider's comment

The extracts will be manual and will be provided in a .csv format the same as it was provided to AWTH from Woolclip.

Detailed compliance report against Farm Data Code

Portability

4.3

At the request of the Farmer, delete or dispose of any Identifying Farm Data, unless prohibited by law or unable to do so.

Meets the code?



Yes

Provider's comment

- Personal Information and Shared Data entered by growers will be deleted upon request when the grower requests service termination
- Transformed Data, which is de-identified Shared Data, will be stored in separate tables, and is not deleted upon service termination
- Shearing test data obtained from the testing authority (AWTA) will not be deleted upon service termination unless requested by the Selling agent.

The purge will be manually executed by the app administrators.

Ownership provisions will survive termination of the agreement. Clause 16.7 USA.

Backups will retain farm data but will automatically be overwritten after 2 weeks.

Detailed compliance report against Farm Data Code

Portability

4.4

Ensure that contingency plans exist to give Farmers the option to port and/or delete Identifying Farm Data in the event of insolvency.

Meets the code?



Yes

Provider's comment

As per USA clause 5.7 they have the right to purge.

Detailed compliance report against Farm Data Code

Portability

4.5

Provide the Farmer fair warning in advance of changes to legal jurisdiction, change of control, or sale of the Provider entity, and adequate time for the Farmer to port and/or delete their Identifying Farm Data.

Meets the code?



Yes

Provider's comment

Clause 17.2 advises the right and obligations of the administrator can be transferred and must be communicated with written notice.

Detailed compliance report against Farm Data Code

Portability

4.6

Ensure that Farmers can port and/or delete Identifying Farm Data in the event of service termination.

Meets the code?



Yes

Provider's comment

A Grower can request to terminate an agreement at any time by contacting the administrator.

- Personal Information and Shared Data entered by growers will be deleted upon request when the grower requests service termination
- Transformed Data, which is de-identified Shared Data, will be stored in separate tables, and is not deleted upon service termination
- Shearing test data obtained from the testing authority (AWTA) will not be deleted upon service termination unless requested by the selling agent.

Detailed compliance report against Farm Data Code

Security

Keeping Farm Data protected and secure.
Providers will:

Data Code Principles



5.1



5.2



5.3



5.4



5.5

Detailed compliance report against Farm Data Code

Security

5.1

Take all reasonable and prudent steps, in line with industry best practice, to ensure Farm Data and any other data provided by the Farmer to the Provider, are protected at all times from unauthorised access, damage or destruction.

NOTE: Assessed based on this provider's answers to security questions based on the Australian Consumer Data Right Accreditation Controls Guidance

Meets the code?



Yes

Provider's comment

Farm data is stored on secure Microsoft Azure cloud services.

A list is maintained on who access to the database. New access must be approved by the AWTH system administrators AWTA.

Where possible, data will be obfuscated in dev and test systems and in any industry report (excluding regulatory requirements).

Detailed compliance report against Farm Data Code

Security

5.2

Put in specific data management protocols to protect sensitive data about the Farmer or farm, such as personal/financial information.

Meets the code?



Yes

Provider's comment

We use AWTa Microsoft accounts with SSO to access all data. Multi-factor authentication is applied to all accounts and must be used when the user logs on to the system.

Administrative privileges to systems containing Farm Data are reviewed every 45 days.

Microsoft Entra and Okta used to monitor logins.

All data is encrypted at rest in Azure SQL databases, SSL is used on all connections.

Detailed compliance report against Farm Data Code

Security

5.3

Promptly notify the Farmer of a data breach that has led to unauthorised access to, or damaged or destroyed Farm Data.

Meets the code?



Yes

Provider's comment

The USA includes in 11.4
" You and the Administrator must:
immediately notify the other upon becoming aware of any unauthorised access to, use of or disclosure of Personal Information under that party's control by virtue of this agreement (or as otherwise uploaded to the AWTH) and provide advice as to whether it considers that such security breach may result in serious harm to any individual to whom the information relates; and comply with, and immediately notify the other party of, any reasonable demands or enquiries made by the Federal Privacy Commissioner or corresponding government authority in another jurisdiction in relation to the collection, protection, use, management or disclosure (including trans-jurisdictional disclosure) of Personal Information in connection with this agreement."

Detailed compliance report against Farm Data Code

Security

5.4

Implement a backup and recovery regime that is appropriate for the scale, sensitivity and timeliness of the Farm Data.

Meets the code?



Yes

Provider's comment

Data is backed up instantly and will be restored in under 24 hours.

Data backups retained for 14 days.

Detailed compliance report against Farm Data Code

Security

5.5

Ensure all staff and sub-contractors that work with Farm Data, and/or set terms, policies, and/or processes for Farm Data are trained to comply with the terms of this Code.

Meets the code?



Yes

Provider's comment

Regular training takes place, e-learning module and ongoing phishing/security training as part of our annual program of work. This is for the whole organisation.

Staff who directly access Farm Data must read and acknowledge the User Service Agreement, Terms of Use, Privacy Policy and NFF data code briefing document annually through our training platform.

Detailed compliance report against Farm Data Code

Compliance

Compliance with privacy and disclosure obligations. Where Providers are required by law to provide information to a third party, they will:

Data Code Principles



6.1



6.2

Detailed compliance report against Farm Data Code

Compliance

6.1

Avoid disclosing any Identifying Farm Data; or,

Meets the code?



Yes

Provider's comment

Will only provide this data to Chief Vet Officer. AWTH administrator will not contact Grower. This is the responsibility of the CVO to ensure it is adequately managed.

Detailed compliance report against Farm Data Code

Compliance

6.2

If Identifying Farm Data must be disclosed, where legally permissible the Provider must promptly notify any Farmer whose information will be (or has been – if prior warning is not possible) disclosed.

Meets the code?



Yes

Provider's comment

Will only provide this data to Chief Vet Officer. AWTH administrator will not contact Grower. This is the responsibility of the CVO to ensure it is adequately managed.

Disclaimer

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What is certification?

Providers who wish for their Products to be assessed and certified for compliance against the Code apply for assessment by NFF. NFF perform a desktop review of certain documents to assess a Product’s compliance before publishing the outcome of this assessment on the Website. Where a Product complies completely with the Code it will be certified.

NFF’s intention is that the Website provides a quick reference for how Products comply with the Code and provides a summary of how Farm Data is handled by Providers.

Certification and assessment is not advice on the quality of the services provided by a Provider or the Product and the review performed by NFF does not consider or reflect these aspects in any way.

By including the Summary Audit Report or certification of a Product on the Website, NFF is not providing an endorsement of the Product, Provider or any services.

How do members of the farming industry use the Website?

NFF operates the Website to allow members of the public to review Providers’ and Products’ performance against the Code, as assessed by NFF.

While NFF has taken all reasonable measures to confirm the accuracy of its assessment, it does not warrant that any information published on the Website is accurate, complete, reliable or up to date. We request that Providers ensure the information they provide is correct when they apply for assessment and certification, however rely on Providers to comply with this request.

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NFF encourages farmers to report to NFF any conduct of a Provider or a Product that does not comply with the Code. However, NFF accepts no liability for any aspect of the interaction between a Provider and user of the Website, including but not limited to fees, payments and refunds, scope of services, performance or delivery of any services or contractual disputes. NFF is not a regulator of the relationship between a Provider and any recipient of the Provider’s services.

How is personal information used in a complaint?

If you make a complaint, your personal information will be used by NFF to contact you and obtain additional information from you about the alleged breach of the Code. Your personal information will never be published by NFF or provided to a Provider.

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