



2 December 2024

Powers and Immunities  
Department of Infrastructure, Transport,  
Regional Development, Communications and the Arts

Via email: [powersandimmunities@communications.gov.au](mailto:powersandimmunities@communications.gov.au)

**Re: NFF submission to Amendments to the Telecommunications (Low-Impact Facilities) Determination 2018 and Telecommunications Code of Practice 2021**

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts' (the Department) proposed amendments to the *Telecommunications (Low-impact Facilities) Determination 2018* (the LIFD) and the *Telecommunications Code of Practice 2021* (the Code).

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

Regional Australians, like their metropolitan counterparts, place significant importance on the coverage, reliability, and resilience of mobile communications. Mobile connectivity plays a vital role in supporting the everyday business, education, social and health outcomes of regional Australians. As the 2021 Regional Telecommunications Review (RTIRC) noted:

*'Reliable access to mobile connectivity continues to be of critical importance to people living, working and travelling in regional, rural and remote Australia. Indeed, the vast majority of individual submissions to this Review have highlighted both the role that mobile coverage plays in the economic productivity and social wellbeing of regional consumers, and conversely, the serious impacts that a lack of mobile reception can have when people need it most.'*

While programs to support mobile infrastructure expansion have seen increased coverage in recent years, connectivity and service quality issues remain. An oft-described issue is "salt and pepper connectivity", referring to the localised connectivity gaps on, across and between farms. This can impact people's basic ability to make phone calls and send texts, in addition to hampering online administration tasks, the digital functionality of equipment, and the ability to adopt new technology. Crucially, this can also result in serious adverse outcomes during health incidents or accidents.

The NFF supports the proposed amendments to the LIFD and the Code, noting the intention to deliver improved connectivity in rural areas and meet increasing consumer demand. The amendments should reduce impediments to network rollout and improve resilience, particularly in natural disaster situations.

This aligns with the NFF's Connectivity and Digital Agriculture Policy, especially:

- **Principle 1:** All Australians must have accessible, reliable, cost-effective, resilient and quality connectivity outcomes; and



- **Principle 5:** Connectivity services are critical to the safety of all Australians during and after periods of natural disasters.

Of particular relevance to the latter principle is LIFD amendments that facilitate the increased rollout of standalone power systems including through larger permissible solar panel arrays. The NFF favours this amendment to better support service continuity during periods of natural disaster.

The NFF notes the request from the Department for comment on the proposed maximum height of five metres for equipment shelters in rural areas. While the NFF supports increasing the maximum dimensions for shelters where necessary, it is important that the size of any facility be directly proportionate to its use. That is, carriers should only build shelters at the (proposed) maximum allowed size if necessary for the specific requirements or uses of that facility. This could be specifically enshrined in the Code to protect the amenity of nearby landowners or occupiers. The notification processes for such shelters should also include specific reference to the purpose of the site as justification for a facility's size.

In general, the NFF strongly supports the inclusion in the Code of robust notification and objection processes and requirements, alongside the safeguards established in the Mobile Phone Base Station Deployment Industry Code (C564:2020), to give individuals effective channels to raise their concerns and provide input, including on matters of amenity.

While recognising the value of reliable and resilient connectivity, balancing these needs with land access remains a key concern for farmers and the NFF. It is important that any facilities are placed in the landscape with proper, timely consultation, appropriate compensation or commercial consent, and do not adversely impact existing land use. This is especially relevant in situations where transmission infrastructure is linked with telecommunications facilities.

The NFF thanks the Department for the opportunity to provide input to the consultation on the proposed amendments to the LIFD and the Code. The NFF supports efforts by government, including appropriate regulatory reform, to enhance accessible, reliable, affordable and quality telecommunications services which are fundamental to the lives of regional Australians.

The NFF looks forward to continuing to engage with the Department on this important issue. Should you seek any further information on this submission, please do not hesitate to contact [REDACTED]

Regards,

[REDACTED]

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