



The Triple Zero Custodian  
 Department of Infrastructure, Transport, Regional Development,  
 Communications, Sport and the Arts  
 GPO Box 594  
 CANBERRA ACT 2601



Primary Producers SA Inc.



T:08 8297 0899

ABN 75 266 051 838

[www.ppsa.org.au](http://www.ppsa.org.au)

29 June 2026

To whom it may concern

**Re: Triple Zero Legislative and Regulatory Review**

Primary Producers SA (PPSA) welcomes the opportunity to provide feedback to the Triple Zero Custodian (Custodian) on how the Triple Zero legislative and regulatory framework can continue to deliver for Australians – now and in the future.

PPSA is the peak industry body representing the interests of South Australian primary producers and is the state’s member of the National Farmers’ Federation (NFF). Our membership comprises South Australia’s peak commodity organisations, including Grain Producers SA, Livestock SA, the SA Dairyfarmers’ Association, the SA Forest Products Association, the Horticulture Coalition of SA, and the Wine Grape Council of SA.

As the peak body representing South Australia’s primary production industries, PPSA advocates on behalf of producers operating across some of Australia’s most geographically dispersed and connectivity-challenged regions. Reliable access to emergency communications is a critical safety issue for farming businesses, regional workforces and rural communities.

PPSA understands the purpose of the Review is to identify whether the current regulatory and legislative framework remains effective in supporting delivery of Triple Zero now and into the future.

PPSA notes that this review follows a series of significant telecommunications and emergency communications reviews, including investigations into major network outages and broader reforms to Australia’s telecommunications framework. These events have reinforced the importance of ensuring that all Australians, regardless of location, can reliably access emergency services when required.

**Access to Triple Zero is a fundamental public safety requirement. For South Australian primary producers and regional communities, reliable emergency communications are not simply a matter of convenience—they are essential to protecting lives, livelihoods and community viability.**

OUR INDUSTRY MEMBERS



## South Australian Context

South Australian primary producers regularly operate in remote and isolated environments where communications services cannot be taken for granted. Agricultural operations often require individuals to work alone across large properties, sometimes many kilometres from homesteads or other support.

The risks associated with limited connectivity are particularly acute during bushfires, storms, floods and other emergency events. South Australia's vast pastoral regions, grain-growing districts, horticultural production zones and livestock enterprises all depend on reliable telecommunications services to support emergency response, worker safety and community resilience.

For many regional communities, mobile coverage remains inconsistent and network resilience is insufficient during major disruptions. In areas where only one mobile provider offers service, network outages can effectively remove all practical access to emergency communications.

- **Access to Triple Zero**

**PPSA strongly supports the principle that access to Triple Zero should be accessible, reliable, resilient and technology-neutral.**

Emergency communications frameworks must evolve alongside changes in consumer behaviour and technological capability. While traditional voice services remain essential, emerging technologies—including satellite-enabled communications, smart devices and direct-to-device satellite services—have the potential to significantly improve emergency access for regional Australians.

PPSA supports regulatory settings that enable Triple Zero access through as many appropriate technologies as possible. Building redundancy into emergency communications pathways is particularly important in regional and remote Australia, where a single point of failure can have worker safety and life-threatening consequences.

- **Text-Based Emergency Communications**

**PPSA supports the introduction of enhanced text-based emergency communications capabilities.**

In regional South Australia, users operating in fringe coverage areas may experience repeated call failures or dropped voice connections. The ability to send a text-based emergency message would provide a critical alternative communication pathway when voice services are unavailable, unreliable or impractical.

Text access may also improve outcomes for users during natural disasters, communications outages and other situations where network congestion affects call reliability.

- **Universal Outdoor Mobile Obligation (UOMO)**

**PPSA strongly supports the proposed Universal Outdoor Mobile Obligation as a significant reform to Australia's universal telecommunications framework.**

The Uomo has the potential to improve safety outcomes for regional South Australians by establishing more consistent expectations around outdoor mobile connectivity and emergency access capabilities.

PPSA believes that guaranteed access to Triple Zero and emergency assistance should be embedded as a core objective of the Uomo framework. Emerging low earth orbit (LEO) satellite technologies and direct-to-device services present an important opportunity to extend emergency communications capability across South Australia's extensive agricultural and pastoral regions.

To maximise the benefits of the Uomo, the Australian Government should establish enforceable standards, performance measures and accountability mechanisms prior to implementation.

- **Telecommunications Resilience and Coverage**

**PPSA supports continued government investment in programs that strengthen regional telecommunications resilience and coverage.**

Programs focused on mobile blackspot reduction, network hardening, disaster resilience and regional coverage expansion play a critical role in improving community safety and ensuring access to emergency services.

Reliable emergency communications depend not only on the operation of the Triple Zero service itself but also on the resilience of the underlying telecommunications infrastructure used to access it.

- **Transparency and Performance Standards**

**PPSA supports stronger transparency, monitoring and reporting requirements across the entire emergency communications ecosystem.**

Consumers should have confidence that emergency communications systems are subject to clear performance standards and meaningful accountability measures. Reporting frameworks should adequately capture regional user experiences, including unsuccessful attempts to connect to emergency services from fringe coverage areas or during network disruptions.

Greater transparency will support continuous improvement and help identify systemic issues affecting regional communities.

- **Non-Conforming Devices**

**PPSA supports measures to ensure devices operating on Australian telecommunications networks can reliably access Triple Zero services.**

Where regulatory action is taken to restrict non-conforming devices, governments and industry should provide clear communication, education and transition support. Particular consideration should be given to regional consumers who may have limited access to technical assistance or replacement services.

**In summary, PPSA recommends that the Australian Government:**

- 1. Maintain a technology-neutral approach to Triple Zero access.**
- 2. Expand emergency access capabilities across emerging communications technologies.**
- 3. Progress text-based emergency communications options.**
- 4. Embed access to Triple Zero as a core requirement within the UOMO framework.**
- 5. Develop enforceable performance standards and accountability measures.**
- 6. Continue investment in regional telecommunications resilience and coverage programs.**
- 7. Improve transparency and public reporting regarding emergency communications performance.**
- 8. Ensure consumers are supported through transitions associated with device compliance requirements.**
- 9. Ensure the needs of the regional, remote and agricultural industries are deliberately and explicitly considered in future Triple Zero legislative standards, performance measures and reforms.**

PPSA welcomes the opportunity to participate in ongoing consultation. Should you require any further information, please do not hesitate to contact [admin@ppsa.org.au](mailto:admin@ppsa.org.au)

Thank you for your consideration of our submission.

Yours sincerely



**Caroline Rhodes**  
**Chief Executive Officer**

Copy: Hon Clare Scriven MLC, Minister for Primary Industries and Regional Development  
Prof Mehdi Doroudi, Chief Executive, Dept of Primary Industries and Regions SA