

Consultation on Universal Outdoor Mobile Obligation (UOMO) draft legislation

October 2025



Recommendations

The NFF makes the following recommendations to ensure the Universal Outdoor Mobile Obligation (UOMO) delivers meaningful, reliable, and equitable mobile connectivity outcomes for rural, regional, and remote Australians.

Recommendation 1: Recognise access to Triple Zero and emergency assistance as a core UOMO capability

- Embed access to Triple Zero and emergency assistance in the legislative framework.
- Acknowledge the role of mobile connectivity in supporting work, health and safety outcomes in agricultural settings.
- Support the Australian Communications Consumer Action Network's recommendation to focus the UOMO on delivering essential capabilities, including access to Triple Zero, digital government services, and social connectivity.

Recommendation 2: Develop enforceable standards, rules and benchmarks (sections 12N–12P) before UOMO commencement

- Establish minimum service standards for voice and SMS performance, reliability, latency, and fault rectification prior to implementation of the UOMO.
- Expand independent quality assurance mechanisms (e.g. National Audit of Mobile Coverage) to assess both terrestrial and satellite performance.

Recommendation 3: Ensure “equitable basis” includes affordability

- Interpret “equitable basis” in the legislation to include affordability by using section 12N(1)(a) powers to set standards that ensure fair and consistent pricing.

Recommendation 4: Clarify accessibility requirements

- Ensure all mobile plans, current and future, provide access to baseline outdoor mobile coverage that Primary Universal Outdoor Mobile Providers are obliged to provide under the UOMO.
- Clarify how the UOMO will impact Mobile Virtual Network Operators (MVNOs).
- Ensure affordable access to UOMO compatible devices.
- Develop accessibility guidelines, public education materials and leverage the Regional Tech Hub as a trusted, independent source of information.

Recommendation 5: Strengthen enforcement powers and accountability mechanisms

- Empower the Australian Communications and Media Authority to effectively enforce UOMO requirements and minimum service standards.
- Establish independent oversight and redress mechanisms.
- Apply Australia's domestic telecommunications regulatory framework to satellite services.

Recommendation 6: Address related challenges and reforms

- Maintain public investment in terrestrial networks (e.g. Mobile Black Spot Program, Mobile Network Hardening Program).
- Support the development of Temporary Disaster Roaming (TDR) to enable emergency connectivity across networks.
- Develop a long-term Regional Connectivity Strategy, as recommended by the 2024 Regional Telecommunications Review.
- Progress reforms to modernise the broader universal services framework, to integrate mobile and broadband into a unified universal service framework that reflects contemporary consumer needs
- Expand the Regional Tech Hub's role and resources to support rural consumers and improve connectivity literacy.

The National Farmers' Federation (NFF) is the voice of Australian farmers.

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

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

NFF Member Organisations



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Executive Summary

The National Farmers' Federation (NFF) welcomes the opportunity to contribute to the Australian Government's consultation on the draft Universal Outdoor Mobile Obligation (UOMO) legislation (the Bill).

The NFF strongly supports the establishment of the UOMO as a foundational reform to modernise Australia's universal service framework. For Australian farmers, mobile connectivity is not a luxury, it is essential for safety, productivity, and access to services. The importance of the UOMO will be heightened for Australians in regional, rural and remote areas, who will rely on the obligation to secure mobile coverage they have never had, or have never been able to depend on. It also presents a critical opportunity to enshrine outdoor mobile coverage as a universal right, enabled by emerging technologies such as Low Earth Orbit Satellites with direct to device capabilities.

The NFF supports the Bill's technology-neutral design and the designation of Telstra, Optus, and TPG as the initial Primary Universal Outdoor Mobile Providers. The NFF also welcomes the Bill's definitions of mobile coverage and outdoor usability, which provide important clarity, and recognition of the need to ensure service is delivered on an equitable basis.

The NFF makes the following recommendations to ensure the UOMO delivers meaningful, reliable, and equitable mobile connectivity outcomes for rural, regional, and remote Australians.

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- Embed access to Triple Zero and emergency assistance in the legislative framework.
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- Ensure all mobile plans, current and future, provide access to baseline outdoor mobile coverage that Primary Universal Outdoor Mobile Providers are obliged to provide under the UOMO.

- Clarify how the UOMO will impact Mobile Virtual Network Operators.
- Ensure affordable access to UOMO compatible devices.
- Develop accessibility guidelines, public education materials and leverage the Regional Tech Hub as a trusted, independent source of information.

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- Develop a long-term Regional Connectivity Strategy, as recommended by the 2024 Regional Telecommunications Review.
- Progress reforms to modernise the broader universal services framework, to integrate mobile and broadband into a unified universal service framework that reflects contemporary consumer needs
- Expand the Regional Tech Hub's role and resources to support rural consumers and improve connectivity literacy.

The NFF looks forward to working collaboratively with the Government to ensure the UOMO delivers tangible, equitable, and resilient connectivity outcomes for all Australians.

Introduction

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the Australian Government's Consultation on the Universal Outdoor Mobile Obligation (UOMO) draft legislation (the Bill).

The NFF strongly supports the Australian Government's initiative to establish the Universal Outdoor Mobile Obligation (UOMO), a foundational reform to modernise the universal service framework.

For rural, regional, and remote Australians mobile connectivity is not a luxury; it is a lifeline. It underpins safety, productivity, economic participation, and access to essential services such as health, education, and emergency response. The importance of the Uomo will be heightened for Australians in regional, rural and remote areas, who will rely on the obligation to secure mobile coverage they have never had, or have never been able to depend on.

Australian agriculture is a cornerstone of the national economy. The sector contributes \$91 billion in gross value, accounts for 55% of Australia's land use, and directly employs over 230,000 people.¹ The sector plays a vital role in ensuring domestic food and fibre security, driving export earnings, supporting regional communities, and contributing to Australia's sustainability and climate resilience goals. Yet, despite being one of Australia's most economically and strategically vital sectors, the agriculture sector remains plagued by persistent and systemic connectivity challenges. In the context of mobile connectivity, this includes mobile blackspots, unreliable service quality, and limited access to affordable plans and compatible devices, issues that are particularly acute in rural and remote areas, and during critical periods such as harvest, bushfire season, or natural disasters.

Connectivity is also essential for digital agriculture. It's central to the NFF's vision for a \$100 billion agricultural sector by 2030. Based on research undertaken by NBN Co Limited (nbn) in 2020, connectivity, combined with digital technologies, could increase the sector's gross value of production by \$15.6 billion per year by 2030.² Technologies such as GPS-guided machinery, remote sensors, and automated irrigation systems rely on robust mobile coverage to function effectively. Reliable outdoor coverage is essential for farmers to consistently realise the productivity gains offered by these technologies.

The NFF's Connectivity and Digital Agriculture Policy Statement supports that all Australians, regardless of their location, are entitled to accessible, reliable, quality connectivity services. These services are fundamental to economic, social, health, and educational outcomes, and their importance is heightened in rural areas where alternatives are limited. Connectivity also plays a vital role in farm safety. For example,

¹ ABARES, Agricultural Commodities Report September 2025; ABARES, ABARES Insights: Snapshot of Australia's Agricultural Workforce, 2023

² NBN Co Limited and NFF, Connecting Australian Agriculture, September 2020

during a machinery accident or bushfire, the ability to call for help immediately can be lifesaving.

The UOMO represents a critical opportunity to enshrine mobile connectivity as a universal right. Importantly, the obligation is made possible by the introduction of Low Earth Orbit Satellites (LEOSats) with direct to device (D2D) capabilities. However, its success will depend on how effectively it safeguards outdoor mobile coverage and how well it responds to the unique challenges faced by rural communities.

It is the view of the NFF that the UOMO should:

- enhance access to Triple Zero and emergency assistance across Australia;
- support outdoor voice and SMS coverage in current mobile black spots;
- improve network resilience, particularly during disasters and power outages;
- deliver accessible, reliable, cost-effective, resilient and quality connectivity outcomes; and
- complement but not replace existing connectivity infrastructure including the terrestrial network.

The NFF looks forward to working collaboratively with the Government to ensure the UOMO delivers tangible, equitable, and resilient connectivity outcomes for all Australians.

Commentary on draft legislation

Definitions and scope

The NFF supports the inclusion of key definitions in the draft Bill, including the definition of mobile coverage (s12H(1)) as the availability of SMS and voice services outdoors, and the clarification that “outdoors” excludes coverage inside buildings, vehicles, aircraft, vessels, underground or underwater (s5(2)). These definitions provide adequate clarity for stakeholders.

Importantly, the Bill defines coverage as being available outdoors “if a person outdoors at that location can use it” (s12H(2)). The emphasis on *usability* is critical. Farmers frequently encounter situations where mobile coverage appears to be available, as indicated by coverage maps or signal bars on their devices, yet the service is effectively unusable. Weak signal strength, network congestion, or environmental interference often result in poor call quality (such as being unable to hear the other party), frequent call dropouts, and unreliable SMS delivery. The disconnect between reported coverage and actual service functionality has been a persistent frustration for rural consumers, undermining trust in providers and limiting the effectiveness of mobile connectivity.

While obligations on Mobile Network Operators (MNOs) to support access to Triple Zero services are established by the Emergency Call Service Determination 2019, the NFF considers that the omission of access to Triple Zero and emergency assistance from the core definition of the UOMO is a missed opportunity to reinforce a critical public safety objective. When the UOMO was announced in February 2025, alongside the NFF, the Government explicitly identified access to emergency assistance as a central policy goal. The NFF welcomes further advice from the Government on how best to integrate reliable emergency service access into the draft Bill, whether through an amendment to section 12F, a dedicated provision elsewhere in the legislation, or through future Ministerial

Directions. Irrespective of the means, the final framework must reflect that reliable access to Triple Zero and emergency assistance is a core capability of the UOMO; mobile coverage that cannot support emergency calls is not fit for purpose.

Finally, the phrase “on an equitable basis” (s12F(1)) is not defined in the draft legislation. While its inclusion is welcome, the lack of definition creates ambiguity. The NFF interprets this phrase to mean that coverage must be fairly distributed across geographic and demographic groups, not just concentrated in commercially viable areas. Equity must also include both accessibility and affordability, acknowledging that for rural and remote Australians, the barriers to connectivity extend beyond the physical availability of service. Hence, to ensure this principle is meaningful in practice, the Minister should use their powers to define coverage areas (s8D), set performance benchmarks (s12P), and develop standards relating to pricing and service quality (s12N). Clear mechanisms to define and enforce equitable outcomes will ensure that rural Australians are not left behind.

Implementation and ministerial powers

The NFF strongly supports the Bill’s designation of Telstra, Optus, and TPG as the initial Primary Universal Outdoor Mobile Providers (PUOMPs). These carriers have the scale, infrastructure, and market presence to deliver on the UOMO’s objectives. However, the NFF also supports the Minister’s power to designate additional providers under section 12J, particularly as new technologies and market entrants emerge. For example, if major satellite technology providers begin offering direct-to-consumer mobile services, it may be appropriate to bring them within the scope of the UOMO to ensure consistent standards and accountability across all service types. This flexibility is essential to futureproof the framework and ensure that all providers delivering UOMO-compliant services are subject to the same obligations. The NFF also notes that the Bill does not consider responsibilities for Mobile Virtual Network Operators (MVNOs), and urges consideration of how MVNOs could best be included and held accountable for their role in delivering connectivity services and upholding UOMO obligations.

The NFF strongly supports the Bill’s technology-neutral design, which allows for the delivery of services via terrestrial networks or emerging LEOSats with D2D capabilities. This approach is pragmatic and future-focused, offering flexibility to accommodate evolving technologies and diverse geographic conditions. Importantly, this flexibility must not become a loophole that enables providers to meet their obligations in name only, while delivering substandard or unreliable services in practice. D2D satellite services may offer a comparatively cost-effective solution to extend coverage to existing terrestrial network blackspots and remote areas. However, it is critical to recognise that these services are still evolving and will not deliver coverage comparable to the terrestrial network in the short-term. Known limitations of satellite technologies, such as signal reliability (particularly in different weather scenarios), latency, and device compatibility, must be carefully weighed against the need for the UOMO to deliver a baseline level of certainty for consumers.

The NFF also highlights the importance of early and proactive use of the Minister’s powers under the Bill. These include the ability to designate coverage areas (s8D), exclude areas (s8D(4)), assign obligations to providers (s12J), and set standards and performance benchmarks (s12N–s12P). These powers are essential to shaping equitable and effective service delivery. Delaying their use risks repeating the shortcomings of the Universal

Service Obligation (USO), where a lack of appropriate enforcement and accountability led to instances of patchy, inconsistent service delivery, particularly in remote areas.

The NFF recognises the Bill's provision for a flexible commencement timeline, but emphasises the importance of transparency around how the Minister will assess market conditions and technological readiness when determining whether to bring forward or delay implementation. Specifically, the Bill sets a default commencement date of 1 December 2028 (s5(2)), but allows the Minister to bring this date forward or delay it by up to three 12-month periods (s12L(8)–(9)). The NFF recommends the Government clearly articulates the criteria and evidence base that will inform any decision to accelerate or defer implementation. This should include public reporting on readiness indicators such as technology deployment, device compatibility, service affordability, and the maturity of satellite technologies.

Accountability and enforcement

Strong, transparent and enforceable accountability mechanisms are essential to ensure the UOMO delivers on its promise of equitable and reliable mobile coverage for all Australians.

In terms of enforcement, the Australian Communications and Media Authority (ACMA) currently holds a range of compliance powers under the Telecommunications Act 1997 (Cth) and the Telecommunications (Consumer Protection and Service Standards) Act 1999 (Cth). However, these powers have historically been limited in practice. Under the existing framework, ACMA is required to issue a direction to comply before taking enforcement action, and penalties for breaches are relatively low. This approach has contributed to weak enforcement of the USO, where service failures in rural areas often went unaddressed and consumers had limited avenues for redress.

The NFF is strongly supportive of the Telecommunications Amendment (Enhancing Consumer Safeguards) Bill 2025 which, if passed, will significantly strengthen ACMA's powers and, in turn, its ability to hold PUOMPs accountable to the UOMO. Specifically, the Enhancing Consumer Safeguards Bill will:

- Remove the two-step enforcement process, allowing ACMA to take direct and immediate action against breaches of industry codes and standards.
- Make compliance with registered industry codes mandatory, converting breaches into civil penalty provisions.
- Introduce a Carriage Service Provider (CSP) registration scheme, increasing visibility and oversight of providers.
- Increase maximum penalties for breaches from \$250,000 to \$10 million, aligning telecommunications with other essential service sectors.

These reforms will strengthen ACMA's toolkit and must be available to ACMA to appropriately enforce the UOMO.

The Government should also clarify PUOMPs' accountability when relying on third-party satellite providers to meet UOMO obligations. If a PUOMP relies on third-party satellite technology to meet its UOMO obligations, it must remain responsible for ensuring the service is reliable, functional, and compliant with UOMO standards. Currently, there is a regulatory gap regarding the accountability of satellite service providers within Australia's

telecommunications framework. This gap risks undermining service quality and consumer protections if not addressed as part of the UOMO's implementation.

NFF Recommendations

The NFF makes the following recommendations to ensure the UOMO delivers meaningful, reliable, and equitable mobile connectivity outcomes for rural, regional, and remote Australians.

Recommendation 1: Recognise access to Triple Zero and emergency assistance as core UOMO capability

The NFF recommends that the UOMO framework explicitly recognises access to Triple Zero and emergency assistance as a core capability. This could be embedded in the legislative framework through an amendment to section 12F, a dedicated provision elsewhere in the Bill, or through future Ministerial Directions. The NFF welcomes advice from the Government on the most effective and appropriate mechanism to achieve this.

Ensuring access to emergency services is fundamental to the UOMO's purpose: that all Australians, regardless of location, can call for help when they need it most.

For Australian farmers, reliable access to Triple Zero is not just a public safety issue, it is essential to workplace health and safety. Agricultural work often involves operating alone or in remote areas, where the ability to contact someone in an emergency, whether that's Triple Zero, a neighbour, or family member, can be the difference between timely assistance and serious harm. Reliable mobile connectivity is essential for meeting contemporary WHS obligations, particularly those relating to psychosocial risks. It enables regular check-ins, supports emergency response protocols, and helps mitigate isolation as a workplace hazard. Recognising emergency access as a core UOMO capability will strengthen rural businesses' ability to protect their workforce, meet legal responsibilities, and support staff retention.

The NFF also supports the Australian Communications Consumer Action Network's broader recommendation to focus the UOMO on delivering essential capabilities, including access to Triple Zero, digital government services, and social connectivity.

Recommendation 2: Develop enforceable standards, rules and benchmarks (sections 12N–s12P) before the UOMO commences

While the draft legislation provides the Minister with powers to set standards and benchmarks (s12N–s12P), it does not require these to be in place before UOMO takes effect. The NFF recommends that enforceable minimum service standards be developed and implemented prior to commencement.

These standards should define clear, measurable expectations for voice and SMS reliability, latency, and fault rectification across all technology types, including terrestrial and satellite networks. They must be practical, proportionate, and grounded in real-world performance data to ensure they are achievable, particularly for emerging technologies such as D2D satellite services.

Without such standards, consumers will lack clarity on what the UOMO is intended to deliver. Establishing a baseline level of service quality is essential to provide rural and remote Australians with confidence in the framework. Interim benchmarks or service descriptors may be appropriate initially, with refinement over time as technologies mature and data becomes available.

To support evidence-based standard setting and ongoing accountability, the NFF recommends expanding independent quality assurance mechanisms, such as the National Audit of Mobile Coverage, to assess both terrestrial and satellite service performance. These audits would ensure the UOMO delivers not just theoretical coverage, but reliable, usable mobile services where Australians need them most.

Recommendation 3: Ensure “equitable basis” includes affordability

If the UOMO is to be truly universal, it must be accessible not only in terms of coverage, but also in terms of cost. In rural, regional, and remote areas, where market competition is often limited or non-existent, reliance on market forces alone will not guarantee fair or affordable pricing. Without safeguards, there is a real risk that consumers in these areas will be priced out of essential mobile services, undermining the very purpose of the UOMO.

The phrase “on an equitable basis” (s12F(1)) is included but not defined in the draft legislation. Further, section 12N(1)(a) enables the Minister to determine standards relating to the terms and conditions of supply, including price. The NFF recommends that the Minister exercises their power under section 12N(1)(a) to ensure that affordability is embedded as a core component of the UOMO from the outset.

Under the current Universal Service Obligation (USO), affordability is a foundational principle. Telstra, as the designated universal service provider, is required to offer standard telephone services at the same price nationwide, ensuring that customers in remote areas pay no more than those in cities. This principle of price parity has been critical in maintaining equitable access to voice services across Australia. The UOMO should build on this precedent by ensuring that UOMO-compliant mobile services are available at transparent, fair, and regionally consistent prices.

Affordability must also account for device compatibility and service plan inclusivity. Consumers should not be required to purchase expensive or proprietary devices to access UOMO services, nor should they be excluded based on whether they use pre-paid or post-paid plans. The NFF urges the Government to consider how pricing standards can be designed to reflect the real-world purchasing behaviours and constraints of rural consumers.

Recommendation 4: Clarify accessibility requirements

The Government should provide clear, accessible guidance, in parallel with the rollout of the UOMO, on what consumers will need to access compliant services. Without this clarity, there is a risk of confusion or unintentional exclusion, particularly in rural and remote areas where device availability and plan options may already be limited.

It is the view of the NFF that in order to make the UOMO a truly universal service, the Government should:

- Ensure all mobile plans, current and future, provide access to baseline outdoor mobile coverage that Primary Universal Outdoor Mobile Providers (PUOMPs) are obliged to provide under the UOMO.
- Clarify how the UOMO will impact Mobile Virtual Network Operators (MVNOs).
- Ensure affordable access to UOMO compatible devices.

While MNOs may seek to argue these details should be left to market dynamics and commercial discretion, from a consumer perspective uncertainty around access can lead to exclusion, frustration, and reduced uptake.

The NFF asks the Government to work with industry and consumer groups to develop and publish accessibility guidelines well ahead of implementation. These should be accompanied by public education materials to ensure that all consumers understand how to access UOMO services and what steps they may need to take. As part of this effort, the Regional Tech Hub can play a key role as a trusted, independent source of information, helping to bridge knowledge gaps and support consumers through the implementation.

Recommendation 5: Strengthen enforcement powers and accountability mechanisms

The NFF recommends that the Government implement the following enhancements to enforcement and accountability within the UOMO framework:

- **Empower the ACMA with robust enforcement tools:** The UOMO framework must include clear, enforceable obligations for PUOMPs, backed by significant penalties for non-compliance. The NFF strongly supports the Enhancing Consumer Safeguards Bill 2025 as one measure to strengthen the ACMA's regulatory authority. If passed, it is essential that these enhanced powers are explicitly extended to ACMA's oversight of UOMO obligations.
- **Enforce minimum service standards:** The NFF supports the ACMA being empowered to develop and enforce minimum service standards (discussed in Recommendation 2), with regular public reporting to ensure transparency and build public trust.
- **Establish independent oversight and consumer redress mechanisms:**
 - Establish a Regional Telecommunications Commissioner or Advisory Panel, as proposed in the 2024 Regional Telecommunications Review, to provide independent oversight and ensure regional and rural consumer concerns are addressed;
 - Mandate transparent complaint-handling mechanisms, with clear timeframes and escalation pathways tailored to the needs of rural and remote consumers;
 - Embed transparency in the UOMO compliance framework, through public reporting of provider performance, complaint volumes, and enforcement actions taken.
- **Apply consistent regulation to satellite-based services:** The Government must apply Australia's domestic telecommunications regulatory framework to satellite services. This will assist to address accountability and compliance issues which may arise from PUOMPs relying on third-party satellite services to deliver part of their UOMO obligations. More broadly, this regulatory consistency will ensure that

consumers using D2D services have access to the same protections and remedies as those relying on terrestrial networks.

Recommendation 6: Address related challenges and reform

While these issues fall outside the scope of the current consultation on the draft UOMO legislation, they are essential to its successful implementation and long-term impact. The NFF recommends the Government pursues the following complementary reforms:

- **Ensure ongoing public investment in terrestrial networks:** Maintain funding for programs such as the Mobile Black Spot Program and Mobile Network Hardening Program. Improvements to terrestrial networks remain essential, particularly in areas where unreliable service poses risks to safety and hampers productivity, such as major freight routes and rural towns. There is a strong case for the Government to set early expectations on continued private sector investment in terrestrial mobile networks given the long lead times involved in these investments, and particularly at the current time when carriers may be prioritising growth in LEOSat services over terrestrial mobile network investment.
- **Implement Emergency Mobile Roaming during disasters:** Actively support the development of a Temporary Disaster Roaming (TDR) capability to allow consumers to connect to any available network during emergencies.
- **Develop a Regional Connectivity Strategy:** Establish a long-term, whole-of-government roadmap for improving telecommunications in regional, rural and remote areas, as recommended by the 2024 Regional Telecommunications Review.
- **Modernise the Universal Service Framework:** Progress broader reform to integrate mobile and broadband access into a unified universal service framework that reflects contemporary consumer needs. This framework should be technology-neutral, ensuring flexibility in how services are delivered, and include mechanisms for regular review to keep pace with evolving connectivity standards.
- **Expand the Regional Tech Hub to bolster consumer support and connectivity literacy:** Strengthen the Regional Tech Hub's capacity to support more rural consumers by expanding its reach, resources, and role in connectivity literacy. As a trusted, independent source of information, the Hub is well-placed to help Australians navigate service options, device compatibility, and troubleshooting processes, ensuring that services like the UOMO are accessible and effective for rural Australians.

Conclusion

The NFF thanks the Government for the opportunity to contribute to this important consultation. The UOMO represents a significant and commendable step toward improving mobile connectivity for Australian farmers and rural communities. The NFF looks forward to continuing to work collaboratively with the Government to ensure the UOMO is implemented effectively, supported by strong safeguards, clear consumer guidance, and complementary reforms that deliver lasting benefits to the regions.

The policy contact for this subject is [REDACTED], General Manager, Rural Affairs via e-mail: [REDACTED] or mobile: [REDACTED].



National
Farmers
Federation

Leading
Australian
Agriculture

NFF House
14-16 Brisbane Avenue
Barton ACT 2600

Locked Bag 9
Kingston ACT 2604

(02) 6269 5666
reception@nff.org.au
nff.org.au



National Farmers Federation



@NationalFarmers