



22 December 2017

Ms Peta Dixon  
Consumer Policy Unit  
The Treasury

Dear Ms Dixon

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the Treasury regulatory impact assessment of fees for paper bills.

The NFF is the voice of Australian farmers and 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.

The NFF recognises that digital billing is often offered to consumers as a cost effective alternative to paper billing. There are however a number of Australians that do not have reliable access to the internet and have no alternative to paper billing. It is commonly recognised that rural, regional and remote Australians have markedly poorer access to telecommunication services than their urban counterparts. The 2015 Regional Wellbeing Survey from the University of Canberra showed that only 37 per cent of regional Australians felt that they had good access to high speed internet while 48 per cent felt that they had poor access (Schirmer, Yabsley, Mylek, & Peel, 2016).

The digital divide between urban and rural Australia is a real equity issue, leaving Australians living outside of the capital cities behind. The option of electronic billing is simply not feasible for many living in rural, regional or remote Australia due to connectivity issues.

The Precision 2D report (Lamb, D. 2017) states that *"55% of producers reported that they relied on the mobile phone network for internet, yet 43% had patchy or no mobile reception across their property."* Furthermore, consumers using Sky Muster satellite services are most likely to have no other reliable broadband communication options and thus in times of outages, are left without a connection to the internet.

The NFF agrees that Option 3, prohibiting essential service providers from charging paper billing fees, would be an effective method to achieve the Treasuries policy objective without further disadvantaging rural, regional and remote Australians. The NFF agrees with the International Labour Organisation definition of essential service as *"services, by whomever rendered, and whether rendered to the Government or to any other person, the interruption of which would endanger the life, health or personal safety of the whole or part of the*

*population.*” The NFF would consider essential services to include those services provided by: the electricity industry; the gas industry; the water industry; the health sector; fire-fighting services; and the telecommunication sector.

Rural, regional and remote Australians will be significantly disadvantaged by paying paper billing fees at a disproportionality high rate compared to the wider community. It is essential that free paper bills for essential services remain an option for rural, regional and remote Australians that do not have access to modern and effective telecommunications infrastructure. Therefore the NFF endorses Option 3 outlined in the discussion paper to ensure inequality between metropolitan and non-metropolitan areas is minimised when paying for essential services.

Yours sincerely

**TONY MAHAR**  
**Chief Executive Officer**

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<sup>i</sup> Lamb, D. (2017) *Accelerating precision agriculture to decision agriculture: A review of on-farm telecommunications challenges and opportunities in supporting a digital agriculture future for Australia.* University of New England and Cotton Research and Development Corporation, Australia.