

Part A – Questions for equipment service providers

ID	Question	Response
1	Would you be interested in applying to be an eligible equipment service provider?	N/A
2	Do you have any comments or questions about proposed eligibility requirements for equipment service providers?	<p>Eligibility requirements for service providers are not clear.</p> <ul style="list-style-type: none"> - E.g., Will providers be strictly restricted to those that sell (tangible) equipment only? - What credentials are required for a "reputable" service organisation - we want to avoid "snake oil salesmen", who promise a lot, but deliver a lot. - Can a service provider offer the goods via a sub-contract in a State/territory/region where they (the service provider) may not have a presence already? What about services such as installation and/or training? Does the primary producer application have to be solely responsible for all service delivery elements? <p>Eligibility criteria should include a minimum at least 5 years of business operational experience, submission of an audited balance sheet and income statements (for the last X years). Whilst this does not mitigate the risk that a supplier won't cease operations next week, it will allow the Commonwealth to assess the inherent risk thereof and thereby offer some protection to primary producers as well as reduce reputational risk of the grants program.</p> <p>Furthermore, suppliers should be required to supply testimonials / letters of support from recent clients where they have recently supplied and installed the proposed equipment lists.</p>
3	What would hinder you from participating as an eligible equipment service provider?	N/A
4	What is the most popular and relevant connectivity product your business provides to farming, fisheries or forestry businesses?	N/A
5	Do you have any concerns regarding sourcing connectivity products? Are there any supply chain issues currently affecting your business?	<p>Supply chain uncertainty - how will this be addressed, and to what extent is it a key success factor of the grants program / benefits realisations?</p> <p>To what extent will service providers ability to meet demand expectations my exceed supply in a timely manner in some/all locations be assessed as part of the "deemed eligibility"?</p>
6	Do you have any suggestions on how the Program can be improved?	<p>The eConnect IOT Decision Ag Grants Program (2018-2020) project showed that primary producers value 'dashboards' to display the outputs of multiple sensor types from multiple providers.</p> <p>The Grant should enable primary producers to also utilise the services of specialised third party service providers [REDACTED]. Failure to do so will inhibit the value proposition for the Grant as well as any realisable business benefits to producers (e.g., inability to derive any insights from equipment supply through poor visualisation of the data, and/or inability to multiple sensor data/data sets). Specifically, not "all dashboards are created equal", and a number of vendor solutions do not necessarily meet key user requirements and this may only be discovered post installation and after a protracted support process.</p> <p>In this instance, primary producers may wish to contract a third-party specialist provider [REDACTED] who can help address these challenges on behalf of the producer.</p>

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		<p>There is often a gap in responsibilities between a service provider just offering equipment, e.g., some web based business, and the correct equipment being selected and correctly installed to meet a defined business need.</p> <p>Consideration should be given for allowing "solution providers" to help with the sourcing and integration of equipment to help ensure working solutions are delivered.</p>

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7	Please provide any other information that you think would assist the Department in designing this Program.	<p>Lack on market presence by Service Provider in some areas / locations. The grant should publish a list by equipment services providers (matrix type) and indicate in which states/territories they operate in. As noted above, what considerations have been / will be allowed re subcontracting of services? Allowing sub-contracts has some obvious pros and cons, such as market growth vs the ability to support "possible rapid expansion".</p> <p>Lack of clear guidelines and process re artefacts and other criteria required to meet rebate requirements by service providers, e.g., installation acceptance, evidence of "training", etc.</p> <p>It's unclear at which point the provider is allowed to claim their rebate, and what supporting documentation is required. If the rebate process is entirely at the discretion of the provider, then there is an inherent risk that service delivery (including installation, training etc.) may not happen, be inadequate etc. leave the producers underwhelmed by their investment and experience.</p> <p>- Consideration should perhaps be given that the Primary producers pay full-price and then they themselves seek the rebate from BGH. This may however, put cashflow pressures on the smaller farm businesses. The appropriate check's and balances will still need to be put in place to ensure that the correct equipment has been ordered, installed etc.</p> <p>- If the providers can only claim their rebate once primary producers have submitted supporting paper work/evidence, (e.g., acceptance and handover report, installation pics) - there is still a risk that Producers may be slow in submitting this, and in turn will impact rebate payments back to primary producers. Likewise, there is a similar risk re a lack of sufficient working capital by service providers to wear cost of delays beyond their control - particularly for some high-cost items with low profit margins.</p> <p>Inability of equipment service providers (plus any subcontractors) to meet demand.</p> <p>For example, a technology provider partnered with a number of WA Grower Groups as part of the eConnect Decision Ag IOT grants program, and was then unable to meet the installation timeframes required by the Grower groups and the grants program.</p> <p>Supply chain uncertainty - can vendors deliver what they promise in a timely manner? Given on-going uncertainty, what controls if any are being considered to mitigate supply chain risks that are outside the direct control of the service provider?</p> <p>DPIRD agrees with the 50% rebate principle as it seems appropriate at a broad level and aligns with other grant processes.</p> <p>Can a SP subcontract the supply and/or installation of their equipment in a region where they currently don't have direct market access but would like to expand their market presence albeit indirectly (for example a supplier operates in say NSW, but there is demand for the product in say WA where the supplier may not have a local presence but the installation can be outsourced to a local subcontractor)? If so, who would the rebate process then work?</p>

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		<p>Can third-party (solution integrators) qualify as a service provider under the grants program, where they have the expertise to independently source equipment, undertake/oversee any installation and integration works to ensure "product meets user requirements"?</p> <p>Too many "snake oil salesmen" will promise a solution, but be unable to actually deliver / integrate a complete solution that is ultimately required to meet defined user needs. The ability of solution integrators, may be an option to help install and integrate multiple solutions to meet defined user needs of primary producers.</p>

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		<p>What are the rights of primary producers should equipment suppliers failure to deliver a working solution through either non-delivery of the equipment or promotion of incorrect technology on behalf of the service provider?</p> <p>What happens in the event of solvency or business entity breakdown (e.g., partnership dissolution) prior to delivery/installation of the equipment prior to any short-term business benefits being realised by the primary producer?</p>

Part B - Questions for primary producers

ID	Question	Response
8	<p>What connectivity solutions do you believe are most needed on farms or in forestry or fishery businesses, and why?</p>	<p>The Grant appears to be heavily slanted towards “across farm” connectivity solutions, i.e., cellular and fixed wireless. There is not explicit reference to other on farm connectivity solutions such as LPWAN technology such as LoRaWAN, Sigfox etc.</p> <p>There is lack of clarity re the eligibility of sensors/providers that make use of satellite based technology such as tank a tank and other sensors offered by FarmBot who is not an ISP.</p> <p>The connectivity options inferred in this submission will generally not meet the needs of the fishing industry as a whole, but only land-based processes. If this program is seeking to foster step change in this industry, connectivity solutions appropriate for this industry should be considered within the list of eligible equipment.</p>
9	<p>Do you have any comments or questions regarding the eligibility requirement options for primary producers?</p>	<p>From an ESG (people and animal welfare) perspective, primary producers (e.g., hobby farmers) who do not meet the proposed criteria should not necessarily be excluded.</p>
10	<p>Please provide any other information that you think would assist the Department design this Program.</p>	<p>The grant program should consider focusing on connectivity protocols, not specific vendor equipment, thereby helping to ensure that open standard technology is used and minimising the risk of technology/vendor lock-in with proprietary based products & equipment.</p> <p>There is no clear evidence of support of 3rd party providers who can provide value adding services to help drive investment in connectivity solutions.</p> <p>Asset ownership of equipment is unclear in the discussion document, for example when does the asset transfer to the producer, upon payment of the primary producers 50% payment, upon completion of installation, or when the service provider received their rebate?</p> <p>The grant program should give consideration on consumer/data ownership rights with respect to any end point device, specifically in the case of IOT sensors (which are eligible within the scope of the program).</p> <p>The program should include eligibility criteria (specifically in the case of sensors) in which data ownership must / should (at the very least) rest with asset owners.</p> <p>We are aware that some equipment providers, particularly in case of those offer IOT type solutions, will offer in their T&Cs ownership rights to only the equipment, and limit ownership of the data. In particular they will typically restrict user access to their own proprietary visualisation platform (which may not necessarily be fit for purpose) as well as restrict the asset owner's ability to share that data with a trusted third party, e.g., a University. This will impact the usefulness and long-term benefits of any such investment through such restrictions.</p> <p>How will the program mitigate the risks (as well as resolve any issues arising) to primary producers where the equipment offered and provided is not supplied and installed, and/or does not meet the expectations of the primary producer (as original "promised" by the service provider during the pre-sales process)?</p>

Part C - General Questions & Comments

ID	Question	Response
11	-	<p>Each primary producer sector has its own challenges. For instance, pastoralists and broadacre producers are typically faced with vast distances to the nearest cell phone tower, or fixed wireless network.</p> <p>The fishing industry is keen to adopt real-time quota reporting and quota variations whilst the vessel is on the open water. Access to "terrestrial backhaul" is not possible, and so operators must rely on expensive satellite based services.</p> <p>There are difference challenges for producers (with no easy access to terrestrial backhaul services) to establish connectivity compare to those say in other areas which have better access to terrestrial backhaul services. As such, only those who have ready line of sight type access to established terrestrial broadband services will be able to really benefit from this grant's program. As such, the expected benefits may not be fully realised.</p> <p>This could be expanded to highlight more efficient/effective real-time "regulatory" reporting at sea (here regulatory reporting is inclusive of both compliance and research info). Similar to that in farm/forest, there are gaps in the entire supply connectivity in fisheries i.e. from boat to plate with each fish tracked through the value chain. This later is key to meeting the requirements of certification bodies to enhance the value of the fish products.</p> <p>Finally, while equipment may already be present at ports and key landing sites these are likely to have limited connectivity if one considers the increased volume required in real-time visual/video enhanced future scenarios – this impacts all stakeholders, researchers, and compliance.</p>
12	-	<p>The RCP and various Mobile Blackspot grant programs have focused on public broadband network services. Significant funds have been invested by the Commonwealth, State and industry players to address connectivity needs up to the farm-gate in the regional and rural Australia. This program appears focused on private investment in addressing some of the connectivity changes.</p> <p>Whilst we support the restrictions on ISPs applying for this program, consideration should be given to extending the scope of eligible participants based on location and other industry considerations.</p> <p>The grant appears to exclude primary producers who may meet the eligibility criteria but where there is no access to cellular and fixed wireless services. Examples include producers in WA's rangelands. Such primary producers should be able finding appropriate solutions that make use of equipment from LEO and other satellite service providers such as Starlink who have no retail providers from who primary producers can source requisite equipment.</p> <p>Other examples as noted above include fishery producers - who by nature of their business do not have access to terrestrial based connectivity solutions whilst they are out on the water. The cost of using traditional satellite based services/solutions is cost prohibitive for most businesses, and thus have to rely on off-line business process. There is an industry demand for such business to have real-time access to a quote exchange and other management systems to improve productivity, and this could be provided by solutions that leverage LEO type technologies.</p>
13	-	<p>As this Program is based around the direct use of terrestrial based connectivity solutions (i.e., across-farm), in the case of voice based equipment being offered, it assumes that the inherent back-haul capacity of this existing infrastructure is sufficient to meet any increase in network traffic. Example, by improve on-farm connectivity, there will be an step increase network traffic especially with the adoption of video conference calls.</p> <p>This inherent assumption may not be the case across all geolocations.</p>