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24 November 2016

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Australian Competition and Consumer Commission GPO Box 3131

To Whom It May Concern

CANBERRA ACT 2601

Re: Mobile Roaming Enquiry

Regional Development Australia Whyalla and Eyre Peninsula (RDAWEP) together with the Eyre Peninsula Local Government Association (EPLGA) are pleased to lodge this submission and thank you for providing us with the opportunity to comment on this important issue.

RDAWEP is primarily a partnership between the 3 levels of government - Australian, State and Local Governments. It is a not for profit community based organisation comprised of members who represent community, business and industry in the region with a diverse skill base, demonstrated networks and alliances, and integral local intelligence.

RDAWEP strives to enhance the growth and development of the region through informed regional planning, community and economic development initiatives, job creation strategies, skills development and business investment. Creating strategic partnerships between the 3 levels of government, regional organisations, community and not-for-profit organisations, the private business and industry sector and other key regional stakeholders is fundamental to the success of our role.

The EPLGA is a membership organisation, which provides quality service and leadership relevant to the needs of its 11 Member Councils and is a strong voice and forum for the delivery of community services across Eyre Peninsula.

The RDAWEP region has an area of approximately 230,000km² with a population of about 56,000 people (ABS 2011 census) producing in excess of \$4**bn** worth of exports per annum at an average of \$72,000 per capita annual contribution to GSP. The majority of people in the region live and work on the Eyre Peninsula. Additional information in the form of a regional profile describing industries, employment, population, gross regional product etc. has been included in this submission – refer Appendix 1.

Small and Medium Enterprise businesses (SMEs) are the backbone of the regional economy providing goods and services, employment, and sponsorship to local communities and recreation clubs. Small business sustainability is directly related to the success of the region's major industries, being agriculture, manufacturing, fishing, aquaculture, health care, mining and tourism. These industries provide a high percentage of the region's employment and many SMEs have been established to directly service them.

In 2011 the region had 5,421 businesses, with the largest proportion (2,014 - 37.2%) in the agricultural and fishing sector. Most businesses (3,080 - 56.8%) were owner operated, non-employing businesses. 79% of SMEs were micro-businesses employing less than 5 people.





The 2 regional cities of Whyalla and Port Lincoln have a combined population of approximately 37,000 people, leaving the remainder of the region sparsely populated. This important characteristic presents a major challenge to the provision of efficient infrastructure and access to modern technology. Both are critical ingredients required for a region to compete successfully and sustainably in a global economy. Furthermore the sparse population spread across a vast geographic area in an age of centralised service provision results in a fast growing reliance on modern technology to deliver education, training, health, medical, banking, business services and other essential services on a 24/7 basis.

An example of the impact on an industry sector subject to poor communication coverage is well expressed in the following statement provided recently by Grain Producers SA.

"It is unacceptable that some Eyre Peninsula growers are forced to sell their grain via "Grain Pools" rather than "Cash Sale" as the mobile phone coverage and internet access is too poor to rely on for the instantaneous nature of modern grain trading. We estimate on the Eyre Peninsula alone this is an impost of some \$3.13 million."

RDAWEP's own research into the impact of woefully deficient mobile phone and internet coverage to the district of Elliston, population approximately 1,046, indicates that some 32 jobs would be created if the district received upgraded telecommunications infrastructure. 32 new jobs is akin to a population growth of about 64 people and, in Elliston's case, equating to a population growth rate of approximately 6%. Similar examples exist across the entire region.

The combination of poor telecommunications coverage and lack of on ground medical staff and facilities places many of our communities at unacceptably high risk. Combined with inability for students to access on-line education resources contributes to the difficulty of retaining and growing the regional population.

RDAWEP, government, other organisations and individuals have been able to successfully partner with telecommunication providers to identify and develop solutions for specific telecommunication coverage problems in the region. This can be a long, drawn out and frustrating process however bit by bit specific problems are addressed. Solutions have been developed for specific problems with different providers and there is still a lot more investment required before we have equitable and reliable coverage.

Specific problems have generally been addressed and led to improved coverage and services when providers have identified market potential to create a competitive advantage. In these circumstances competition is good and will continue to improve our economy and increase the sustainability of our communities.

The thin market within our region makes it very unlikely that providers will invest into upgrades that can be "piggy backed" by competitors. Where would the advantage be for the provider making the investment if it cannot create a competitive edge? In our thin market the answer to that question is most likely to be that investment into telecommunication coverage by providers will cease and pressure will increase on governments to finance the gaps.

In summary the economic and social sustainability of the region is underpinned by access to reliable telecommunications coverage. If changes to regulations decrease investment in coverage to the region it will negatively impact the \$4bn export trade, detract liveability and reduce the population. For these reasons it is imperative that your recommendations make this region more globally competitive, not less.

Please do not hesitate to contact the undersigned for further information if required and we thank you for your consideration.

Yours sincerely

Dion Dorward

Chief Executive Officer

RDA Whyalla and Eyre Peninsula

Executive Officer

**EP Local Government Association** 

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## **RDAWEP Regional Profile Summary**

The RDAWEP region comprises 230,000km² of land in the far west of South Australia; about 23% of the State.

The region has a coastal and rural environment with approximately one third of South Australia's coastline stretching over 2,000 kilometres from north of Whyalla to the Western Australian border. The landscape features a rugged and relatively undeveloped coastline, particularly on the western side of the Eyre Peninsula. The coastal and marine environment includes marine and conservation parks and encompasses approximately 250 islands ranging in size from about 180 to 40,000 square metres.

A large proportion of the region has been cleared for agricultural production; but significant areas of native vegetation remain. Vegetation clearance for agricultural purposes ranges from 14% in the far west to 72% in the south. About 15% of the region's grazing area is covered with scattered vegetation.

Natural resources are managed by the Eyre Peninsula and Alinytjara Wilurara NRM Boards.

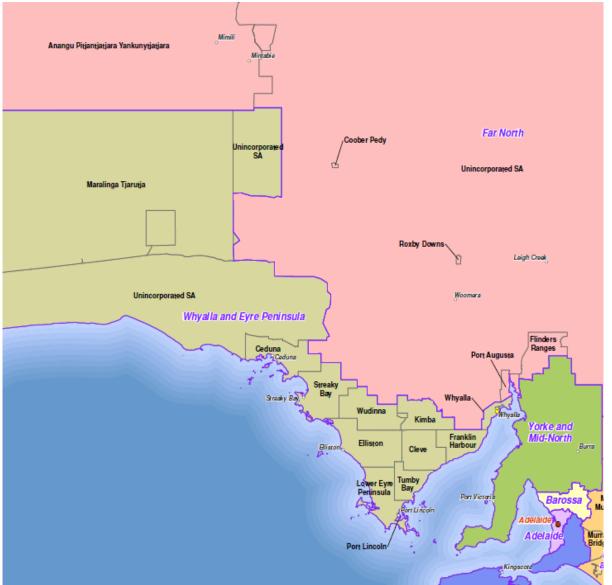


Figure 1: Context Map, Regional Development Australia, Whyalla and Eyre Peninsula.

## Regional Population and Local Government

The region has eleven Local Government Authorities (LGAs) as well as remote unincorporated areas serviced by the Outback Communities Authority. The LGAs are: The City of Whyalla and City of Port Lincoln; and the District Councils of Ceduna, Cleve, Elliston, Franklin Harbour, Kimba, Lower Eyre Peninsula, Streaky Bay, Tumby Bay, and Wudinna.

For Census data collection purposes the Maralinga Tjarutja Aboriginal Land (established under the *Maralinga Tjarutja Land Rights Act*, 1984) is regarded as an LGA in its own right. However, Maralinga Tjarutja is not a member of the EPLGA.

The regional population of 56,396 (ABS 2011 Census) comprises about 3.5% of the South Australian population. 98.7% of people reside in the eleven Council districts, which collectively occupy 43,779km² or about 19% of the regional land mass. Most of the population (64.1% or 36,174 people) live in the regional cities of Whyalla and Port Lincoln.

LOCAL GOVERNMENT	LAND	AREA	POPULATION		
AREA	Km²	% of Region	No.	% of Region	
Whyalla	1,032.5	0.44	22,088	39.16	
Port Lincoln	30.4	0.01	14,086	24.98	
Ceduna	5,427.1	2.33	3,480	6.17	
Cleve	4,506.7	1.94	1,733	3.07	
Elliston	6,500.0	2.79	1,046	1.85	
Franklin Harbour	3,283.0	1.41	1,273	2.26	
Kimba	3,986.2	1.71	1,088	1.93	
Lower Eyre Peninsula	4,771.0	2.05	4,916	8.72	
Streaky Bay	6,232.0	2.68	2,102	3.73	
Tumby Bay	2,615.9	1.12	2,586	4.58	
Wudinna	5,393.8	2.32	1,253	2.22	
Collective Local Government (11 LGA's)	43,778.6	18.8	55,651	98.7	

Table 1: RDAWP Local Government Land Areas and Population 2011.

It should be noted that the land areas and populations of Cleve and Franklin Harbour changed on 1st July 2014 due to an adjustment of the Council boundaries. An area of 492km² of land was transferred from Franklin Harbour to Cleve. Approximately 62 residents live in the area.

In 2011, the region had 3,225 Aboriginal people comprising 5.7% of the regional population. This was notably above the proportions in South Australia (1.9%) and Australia (2.6%). 80% of the region's Aboriginal people (2,572) live in the LGAs of Whyalla, Port Lincoln and Ceduna. The greatest concentration is in Ceduna, where Aboriginal people comprise 24.9% of the Council population

The regional population grew by 4.5% from 2001, but this was not consistent across the region as a whole. The District Councils of Elliston, Wudinna and Kimba experienced population decline of -15.2%, -13.7% and -8.5% respectively; but DC Lower Eyre Peninsula experienced growth of 17.2%. Population growth was also experienced in the coastal Councils of Streaky Bay, Tumby Bay and Port Lincoln.

The demographic change is caused by several factors, with the desire for a sea change lifestyle being a key reason. Streaky Bay and Tumby Bay are very desirable coastal locations and new estate developments have been established to cater for growing housing demand, notably by retirees from the agricultural sector. The higher population growth in DC Lower Eyre Peninsula stems from several locational and lifestyle advantages, including proximity to numerous coastal townships, Port Lincoln and Port Lincoln Airport. Kimba and Wudinna are the only Councils in the region without a coastline, and this impacts their residential appeal and tourism development potential.

## **Population Ageing**

The regional population is ageing. In 2011, the region's median age was 39, an increase from 38 in 2006. People aged 65 years and over comprised 15.5% of the regional population, which is above the 14.0% rate for Australia, but below the rate of 16.2% for South Australia.

PEOPLE 65 YEARS OF AGE AND OVER	Region	%	South Australia	%	Australia	%
2006 ABS Census	7,758	14.3	233,127	15.4	2,644,374	13.3
2006 Median Age	38		39		37	
2011 ABS Census	8,727	15.5	257,551	16.2	3,012,289	14.0
2011 Median Age	39		39		37	

Table 2: People 65 Years of Age and Over. (ABS Census 2006 & 2011).

The population 65 years and over grew by 1.2% from 2006, exceeding the growth rate of 0.8% for South Australia and 0.7% for Australia.

Almost half of the regional population (49.6%) was 40 years of age and over in 2011 with 21.5% over 60 years of age. The District Council of Tumby Bay has the oldest population profile with 60.1% over the age of 40 and 32.1% over 60 years of age. Similar results for the over 40 age sector were recorded for Kimba (55.9%), Franklin Harbour (55.7%), Cleve (55.3%) and Elliston (54.5%).

Conversely, young people 15-24 years of age comprise the smallest sector of the regional population at 12.1% and this is consistent in all local government areas.

Tumby Bay (8.0%), Kimba (8.5%), Cleve (9.1%), Wudinna (9.3%) and Streaky Bay (9.9%) have the smallest proportion of 15-24 year olds, whereas Whyalla (13.4%), Port Lincoln (13.2%) and Ceduna (12.4%) are the only areas where the 15-24 aged sector exceeds the regional average.

Projections indicate that South Australia's population aged 65 and over will increase to 22.6% in 2020 and to 25.7% by 2030. It is also known that approximately 30% of young people leave the region each year for employment and study in metropolitan Adelaide. The combination of a growing aged sector and diminishing numbers of young people is not sustainable, and has serious implications for future workforce provision.

Pending Baby Boomer retirements will diminish the labour force of skilled and experienced labour and create employment openings for young people. It is estimated that over 11,000 workers (about 40% of the regional workforce) will leave their jobs within 20 years if they all retire at 65 years of age. But there will be limited choice with the provision of a capable replacement pool.

The regional population is too small to provide the workforce for anticipated future development needs, with the consequence that approximately 3,800 workers may need to be recruited from elsewhere by 2020.

# **Regional Economic Snapshot**

The regional economy is extremely diverse. The key industries include manufacturing, agriculture, fishing, and aquaculture; however tourism and mining are fast emerging industries with substantial potential for future growth. Industrial diversity is one of the region's greatest attributes, and underpins its comparative advantage and business competitiveness. Diversity is important for economic growth and sustainability, because it provides resilience through not being reliant on a single industry or product for prosperity.

However, industrial diversity is not evenly spread across the region. Manufacturing and steel processing is focused in Whyalla. Agriculture is the key industry in Lower Eyre Peninsula, Tumby Bay, Cleve, Elliston, Kimba, Streaky Bay, Franklin Harbour and Wudinna. Nearly all (96%) of the region's aquaculture jobs are provided in Port Lincoln, Lower Eyre Peninsula, Cleve, Ceduna and Franklin Harbour. Most of the region's fishing jobs (76%) are based in Port Lincoln. Tourism activity is predominantly focussed in coastal areas.

The region's industries and economy have also changed since 2001. Agriculture has been the primary economic driver in many Council districts. However, larger farming properties, smarter management practices, and new technologies have reduced employment opportunities in agri-businesses, which saw agricultural employment decline by 16.8% between 2001 and 2011.

In the same period, employment in the health care and social assistance industry grew by 29.5%; largely due to the ageing of the regional population and increased demand for aged care services. Employment in the mining industry grew by a significant 79.2%, as a result of unprecedented resource exploration activity on the Eyre Peninsula – Table 3.

INDUSTRY	EMPLOYMENT 2001	EMPLOYMENT 2011	% CHANGE
Agriculture, Fishing & Forestry	4,012	3,338	-16.8
Health Care & Social Assistance	2,111	2,996	29.5
Manufacturing	2,786	2,890	3.6
Retail Trade	2,481	2,669	7.0
Education & Training	1,764	1,967	10.3
Construction	1,340	1,813	26.1
Accommodation & Food Services	1,356	1,595	15.0
Transport, Postal & Warehousing	999	1,260	20.7
Public Administration & Safety	1,152	1,172	1.7
Mining	199	957	79.2
TOTAL	18,200	20,657	11.9%

Table 3: RDAWEP Top Ten Employing Industries and Employment Change 2001-2011. (ABS Census 2001 and 2011).

## Regional Employment by Industry

Based on the number of jobs generated, the region's top five employing industries in 2013-14 were (in ranked order): health care and social assistance (health and community services), manufacturing, agriculture, retail trade, and construction.

These industries collectively provided 13,542 (52.0%) of the region's 25,951 jobs in 2013-14. (EconSearch Pty Ltd, *RDAWEP Regional and Council Economic Data 2013-14*, RDAWEP and EPLGA, December 2015).

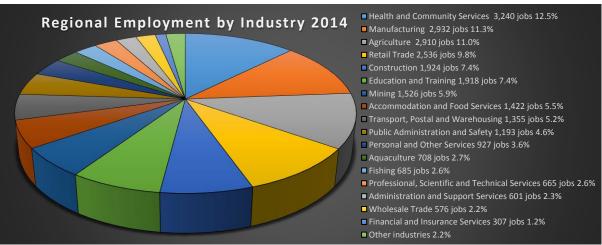


Figure 2: RDAWEP Regional Employment by Industry 2013-14.

### **Health and Community Services**

Health and community services is the largest employing industry in South Australia, and was the largest industry in the region in 2013-14. Health and community services provided 3,240 jobs and 12.5% of regional employment. Due to population ageing and increasing demand for aged care services, the health and community services industry is expected to grow markedly in future years. This will provide one of the best opportunities for employment and business growth. However the aged care sector has considerable difficulty attracting and retaining aged care workers.

### Manufacturing

The manufacturing industry, which includes the production of metal products and food processing, was the region's second largest employer, providing 2,932 jobs and 11.3% of regional employment. The industry experienced modest employment growth of 3.6% from 2001.

Whyalla is the largest industrial city in regional South Australia and the principal centre for manufacturing, steel production and resources processing in the Upper Spencer Gulf. Manufacturing was the biggest employer in Whyalla providing 2,027 jobs, and over two-thirds (69%) of the region's manufacturing employment. Most of Whyalla's manufacturing jobs (87%, 1,755 jobs) were provided in the iron and steel production sector.

### Agriculture

Agriculture was the third largest employer in 2013-14, providing 2,910 jobs and 11.0% of regional employment. The main agricultural sectors are grain production (wheat, barley, canola, oil seed and pulses), sheep, and beef cattle. The grain sector was the largest agricultural employer providing 1,483 jobs and 50.1% of agricultural employment; compared with 827 jobs (28.4%) for sheep, and 437 (15.0%) for beef cattle.

Agriculture was the largest employer in Lower Eyre Peninsula (538 jobs); Tumby Bay (410); Cleve (378), Elliston (332); Kimba (306), Streaky Bay (279), Wudinna (275), and Franklin Harbour (118).

#### **Retail Trade**

Retail trade was the fourth largest industry, providing 2,536 jobs and 9.8% of regional employment. Retail trade is an integral part of the Small to Medium Enterprise (SME) sector in all regional townships – i.e. businesses employing less than 200 people. In 2013-14, most of the region's retail trade employees were based in Whyalla (941, 37% of jobs) and Port Lincoln (919, 36% of retail jobs).

Retail trade had employment growth of 7.0% between 2001 and 2011. The sustainability of retail trade is largely reliant on the success of the region's larger industries – e.g. agriculture, manufacturing, mining and tourism – and many SMEs have been established to directly service and support these sectors.

#### Construction

The construction industry incorporates residential and non-residential building construction, and civil and heavy engineering services. Building and engineering companies are based in most regional towns, with concentration in the larger regional centres of Whyalla, Port Lincoln and Ceduna. These companies provide construction services locally and across the broader region. Construction is a large regional employer, and provided 1,924 jobs and 7.4% of employment in 2013-14.

### Mining

Mining is the region's fastest growing industry, but is a relatively small employer in comparison with other industries. In 2012-13, mining did not rank among the top ten regional employers, but this changed in 2013-14. Mining ranked as the region's seventh largest employer providing 1,526 jobs and 5.9% of employment. This can be attributed to high levels of exploration activity on the Eyre Peninsula at this time by companies such as Centrex Metals/Eyre Iron (for the Fusion Joint Venture); Iron Road Limited (for the Central Eyre Iron Project); and graphite mining and resource exploration by Valence Industries, Lincoln Minerals and Archer Exploration Limited.

It is anticipated that mining will have additional growth in future years when developing mines and prospects move from exploration to operation. This will bring opportunities to create employment and diversify the regional economy. However, mining growth will be subject to substantially improved commodity prices and significant government and private sector investment in major infrastructure (i.e. ports, roads, rail, power and water).

### Fishing and Aquaculture

Fishing and aquaculture are high profile regional industries. The region is internationally renowned for its premium seafood product, largely due to the marketing success of the trade marked brand: 'Eyre Peninsula – Australia's Seafood Frontier'. However, the fishing and aquaculture industries are small employers compared with other industries, and provided 685 (2.6%) and 708 (2.7%) of the region's jobs respectively in 2013-14.

Most of the fishing jobs were provided in Port Lincoln (522), Streaky Bay (55), Elliston (40) and Ceduna (38). Most of the aquaculture jobs were provided in Port Lincoln (261), Lower Eyre Peninsula (199), Franklin Harbour (92), Ceduna (82) and Cleve (49).

#### **Tourism**

Tourism is a fast growing regional industry with considerable development potential, due to the region's attributes of a pristine natural environment, unique nature-based visitor experiences, and diversity of premium food product.

Tourism data have not been identified in the pie charts because the industry categories use the Australian and New Zealand Standard Industrial Classification (ANZSIC) system, which does not identify tourism as an industry in its own right. Tourism activity (i.e. the consumption of goods and services by visitors) is captured within the data provided for the other ANZSIC industries.

However, tourism industry employment and economic data are derived from a range of other sources; including research undertaken by the South Australian Tourism Commission, and Regional Tourism Satellite Accounts produced by Tourism Research Australia (TRA). These sources were used by EconSearch to identify tourism expenditure as a component of the region's exports.

In 2013-14, it was estimated that regional tourism expenditure totalled \$302 million; with \$129 million (42.8%) spent in the retail trade, accommodation, and food and beverage services sectors. TRA Satellite Account data also indicate that the tourism industry contributed about 7.2% of GRP; directly employed 1,530 people (5.3% of regional employment), and generated an additional 1,500 indirect jobs. Most of these jobs were in the food service, hospitality, accommodation and retail trade sectors.

## Regional Exports by Industry

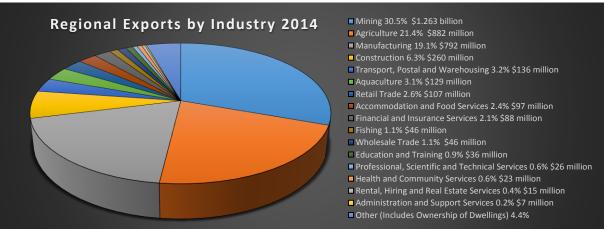


Figure 3: RDAWEP Regional Exports by Industry 2013-14.

RDAWEP is a high export region and produced exports worth \$4.144 billion in 2013-14. The major exporting industries were:

- Mining which provided 30.5% of exports, worth \$1.263 billion,
- Agriculture 21.4% of exports, worth \$882 million, and
- Manufacturing 19.1% of exports, valued at \$792 million.

These industries produced almost three-quarters (71%) of the region's total exports, worth \$2.937 billion. The key exporting sectors within these industries were:

- **Mining:** iron and non-ferrous ore, which provided 27.2% of exports, worth \$1.126 billion; and exploration and mining support services, 1.8% of exports worth \$74.1 million,
- Agriculture: grains, 16.1% of exports worth \$668 million; and sheep, 3.7% worth \$151 million, and
- **Manufacturing:** iron and steel production, providing 15.5% of regional exports worth \$641 million; and processed seafood products, 2.1% of exports worth \$88 million.

These data incorporate exports to intrastate, interstate and overseas markets, however the respective proportions and values to each location are not identified.

The regional contribution to South Australian exports also cannot be identified. The regional data include intrastate exports, whereas State data only apply to exports out of the State. A comparison of regional and State export data would consequently overstate the regional contribution to South Australian export.

## Gross Regional Product by Industry

Gross Regional Product (GRP) is a measure of the net contribution of an activity to the regional economy, and is measured as the value of output less the cost of goods and services. The contribution of an individual industry to GRP is calculated as the sum of household income, gross operating surplus, gross mixed income, and indirect taxes less subsidies.

In 2013-14, the region's GRP was estimated at approximately \$4.2 billion (\$4.195). The top five GRP generating industries were:

- Mining 29.2% of GRP worth \$1.22 billion,
- Agriculture 12.0%, \$502 million,
- Construction 6.0%, \$251 million
- Health and Community Services 5.8%, \$241 million, and
- Manufacturing 5.5%, \$229 million.

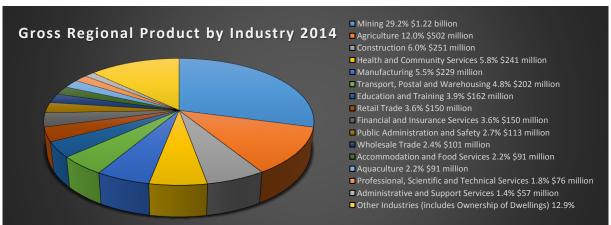


Figure 4: RDAWEP Gross Regional Product by Industry 2013-14.

Even though fishing and aquaculture are high profile regional industries, they did not rank among the top GRP producers in 2013-14. The aquaculture industry contributed 2.2% of GRP worth \$91 million; and Fishing, Hunting and Trapping contributed 0.8% worth \$35 million.

One reason for this lower than anticipated GRP contribution is that the processing of seafood product, which most people would associate with the fishing and aquaculture industries, is categorised under manufacturing by ANZSIC industry conventions. Processed seafood product produced 0.6% of GRP worth \$25 million, which was allocated as a component of manufacturing industry GRP.

## Regional Economic Summary

The Eyre Peninsula is a highly productive region, generating exports worth over \$4 billion per annum and GRP of approximately \$4.2 billion. In 2013-14, South Australia's Gross State Product (GSP) was valued at \$97 billion. With regional GRP of \$4.2 billion, the Eyre Peninsula provided approximately 4.3% of the State economy.

On a per capita basis, as the Eyre Peninsula population is approximately 3.5% of the State population, the region is exceeding its fair contribution to the State economy. However, a per capita analysis undersells the importance of the region to the State economy, which needs to be put into context.

One of the State Government's key economic priorities is the *production of premium food and wine from a clean environment exported to the world.* This is an important brand SA platform for promoting South Australia internationally, and a driving force for creating new export markets in Asia. This State Government priority is very much reliant on the RDAWEP region because the Eyre Peninsula produces and exports most of South Australia's premium food product.

- Agriculture Industry: The region is renowned for its high quality grains and, on average, produces 40% of the State's wheat crop, 24% of the barley drop, and 22% of canola. Approximately 97% of the region's grain crop is exported, and was worth \$643 million in 2013-14.
- **Fishing and Aquaculture:** The region is renowned internationally for its premium seafood. On average, the region produces 100% of South Australia's Southern Bluefin Tuna (with approximately 99% of tuna exported to Japan); along with 100% of the State's farmed marine finfish; 97% of oysters, 92% of mussels, and about 62% of the State's abalone production. In total, approximately 82% of South Australia's seafood product is exported from the Eyre Peninsula. (Regions SA, *Regions in Focus: Whyalla and Eyre Peninsula*, July 2015).

Other State Government economic priorities are to *unlock the full potential of South Australia's resources*, and to enhance State prosperity by *promoting international connections and engagement* to increase exports. The RDAWEP region produces approximately 45% of GSP for iron and steel manufacturing, which highlights the importance of Whyalla to the State economy.

The RDAWEP region might only contribute 4.3% of GSP, however the growth and sustainability of the Eyre Peninsula is vital to the achievement of key State Government economic priorities.

As an overview, the regional economy is extremely diverse, due to the broad range of industries generating exports and GRP. This a great strength which underpins the region's comparative advantages and economic resilience.