QPC ENVIRONMENT PROTECTION REFORMS INQUIRY

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COTTON AUSTRALIA

Advancing Australian Cotton

The QPC Environment Protection Reforms Inquiry

Submission prepared by Jennifer Brown

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ABOUT COTTON AUSTRALIA

Cotton Australia is the peak body for Australia's cotton growers, representing up to 1,500 cotton farms mainly in New South Wales and Queensland but also in the Northern Territory and Western Australia. Cotton Australia works with growers and stakeholders to ensure the Australian cotton industry remains viable.

Cotton Australia supports the Australian cotton industry to be globally competitive, sustainable and valued by the community. It drives the industry's strategic direction, retains a strong focus on research and development, promotes strength of the industry, manages sustainability reporting and implements policy objectives.

1. Executive summary

Cotton Australia welcomes the opportunity to provide this submission to the Queensland Productivity Commission in regarding the Inquiry: the impacts of the Australian Government's 2025 reforms to the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) on Queensland. Cotton Australia is an active member of the Queensland Farmers Federation (QFF) and commends its comprehensive submission to the Department.

The modern-day Australian Cotton Industry generates over $1billion (GVP) from the annual 1-2million bales of lint, to the Queensland economy. As a source of employment both on-farm and across the supporting services, it is a key contributor to the regional communities where cotton is grown.

We are however, very concerned by the significant regulatory burden that has now been placed upon our members by these reforms. In particular there is a lack of clear guidance as to what is now considered exempt or what can be undertaken to mitigate low-risk and routine agricultural activities from assessment. This is causing significant confusion and distress amongst members because the reforms appear to prohibit farming activities that are lawful under State legislation.

2. Recommendations

Cotton Australia recommends:

a) ***That the QPC commission agricultural case studies that document the financial and regulatory implications of the EPBC Act reforms on existing agricultural operations and also pose a potential handbrake on future agricultural development in Queensland.***

b) ***Where farmers are proponents of localised, small-scale agricultural proposals with limited and well understood impacts, the Standards' requirements must be proportionate, practical, and not equivalent to those expected of major greenfield developments or mining projects (As a general guide, where the practice is minor and routine, the application should be able to be easily completed by the landholder, without the need to engage outside consultants).***

c) ***The Queensland Globe Great Barrier Reef Catchment makes a distinction between irrigation systems and natural drainage lines.***

d) ***There is a federal and nexus state between the forthcoming Bioregional Plans and those held by jurisdictions and this needs to be explicit in the Bioregional Plans via the inclusion of hyperlink or similar.***

e) ***Accompanying the Bioregional Plans is landholder guidance for those who are situated in the Plan's vicinity. This could include how to use the Bioregional Plan if they are upslope of a location, what impacts should be avoided or minimized, similarly if they are in a range of one or more of the species or ecological community listed at state and federal level.***

3. Submission response

3.1. INDUSTRY CONTRIBUTION TO THE QUEENSLAND ECONOMY

While Queensland's cotton production is highly variable, the State's 600 growers often produce between 1 million and 2 million bales of lint each year contributing over $1billion (GVP) to the state's economy

Our growers in Queensland reside from the Central Highlands around Emerald, to the Queensland/New South Wales border near Goondiwindi, and from Dalby west to St George and Dirranbandi.

Representing 40% of the national crop, approximately 90% of our producers are family farms, contributing 85% of their income to the Queensland regional economy and nationally employing around 7,000 people. In recent years commercial crops have been established in the Lockyer Valley, Wide Bay and in the Gulf Catchments, with very real expectations that these areas will expand, bringing hundreds of jobs, and economic prosperity to these rural and regional areas.

The crop also produces 250,000 -500,000 tonnes of seed providing cotton seed oil used by hospitality, pharmaceuticals and the Queensland beef industry.

The average farm:

- is family-owned and operated;
- directly creates jobs for six people;
- is run by growers with an average age of 49 years;
- grows 576 hectares of cotton, comprising 10% of the total farm area;
- supplements cotton with other crops including wheat, chickpeas and sorghum; many Australian cotton farmers also graze sheep and cattle;
- includes natural areas – such as native vegetation and riparian zones – ranging from between 10 - 40 % of property area.

The major buyers of Australian cotton are currently Vietnam, China, Bangladesh, India, Indonesia, Turkey and Thailand[1].

The Australia cotton industry is world-leading and is recognised by a number of international organisations as a supplier of sustainable cotton. This has been achieved through decades of research and investment in science and new technologies to deliver practice change and production efficiencies. Compared to the 1990s growing a bale of cotton now uses:

- 52% less water
- 97% less insecticides
- 34% less land

The combination of the industry's best management practice program "myBMP" and an extension delivery service CottonInfo[2] has been key to the uptake of industry's Research and Development; which in itself is co-invested by growers via the legislated research levy and matched dollar for dollar by the Commonwealth Government.[3]

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[1] Australian Cotton Shippers Association

[2] https://www.cottoninfo.com.au/who-are-we

[3] CRDC 2024-25 Annual Report: "In 2024–25, Australian cotton growers and the Commonwealth Government co-invested $28.1 million through CRDC to deliver year two of the CRDC Strategic Plan 2023-28, Clever Cotton. Of this, $17 million was invested in 243 cotton research development and extension (RD&E) projects in collaboration with our 94 research partners. Facilitating the production of 5.4million bales of Australian cotton."

The Crisafulli Government's is also making investments in Queensland's cotton industry, to underpin its 25-year blueprint Primary Industries "Prosper 2050". In December 2025 the Primary Industries Minister Tony Perrett announced a $7.2 million partnership with the Cotton Research and Development Corporation to deliver the "Future Cotton: Innovation and Impact for Sustainability, Biosecurity and Growth" program.[4]

3.2. RESEARCH INFORMED PRACTICE CHANGE AT RISK

It is no exaggeration that the Australian Cotton industry is highly engaged in research informed practice change[5] but at the time of writing the Environmental Protection and Biodiversity Conservation Act reforms appear to be a barrier to agriculture and its long-term viability. We fear this is also put at risk the Queensland Government's research and extension capacity investments, across key cotton regions of Goondiwindi, Emerald, Toowoomba and Darling Downs.

For instance, the Environmental Protection and Biodiversity Conservation Act reforms are establishing a framework of Standards but so far, the publicly available information does not include any evidence of a cost benefit analysis being undertaken of the federal implications let alone obligations being placed on jurisdictions.

We are also concerned that the reforms are putting at risk future productivity gains gleaned from the cotton industry's research investments. For example, the application term "intensification" by the Standards. From our read of the documents, implementing a change in practice, infrastructure or technology determined by research to be the most suited, may in some farming systems be considered as an intensification of a practice. It is the use of 'may' that is most concerning.

Cotton Australia recommends:

a) ***That the QPC commission agricultural case studies that document the financial and regulatory implications of the EPBC Act reforms on existing agricultural operations and also pose a potential handbrake on future agricultural development in Queensland.***

3.3. ABSENCE OF AN AGRICULTURE SPECIFIC PATHWAY

The draft Standards have reframed and expanded the obligations of the EPBC Act's Self Assessment. For example, the draft Matters of National Environmental Significance (MNES) Standard has more detailed requirements for each of the nine MNES. The draft Standard also indicates the various assessments (ecological, heritage, community engagement, indigenous engagement etc) need to be undertaken by a qualified individual.

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[4] https://statements.qld.gov.au/statements/104104

[5] 2025 Growers Survey: 37% held cotton industry research trials on-farm in 24-25 cotton growing season (37% 2024); 52% contributed data to industry R&D (51% in 2024) (e.g. participation in trials or monitoring activities on-farm, providing on-farm data, info to researchers or industry projects https://www.crdc.com.au/sites/default/files/pdf/CRDC%202025%20Grower%20Survey%20-%20Final%20Report.pdf

Also that the arising documentation plus proof of community and indigenous consultation need to be kept by the landholder regardless of whether a formal EPBC referral is lodged. As no timeframe is given we can only assume in light of future sale of the property or succession planning this needs to be for perpetuity.

For a landholder undertaking due diligence for each of these aspects, this is extending the hours they spend in the office rather than attending to running their business. Add to this the costs of their time and any consultant(s) they may engage to provide the initial background information. Cotton Australia estimates from member discussions that to simply engage a suitably qualified individual will in occur at least $120,000. This is even before it is confirmed by the Australian Government officials that a Pre-Referral discussion is needed.

Furthermore, as it currently stands there is no distinction made between the level of documentation required for an activity that is undertaken periodically as part of an established agricultural practice compared to large scale transformation of the landscape, such as a mine.

It is also assumed that our members have both:

- the means to have access to the level of detailed information the Commonwealth uses to make its assessments , and
- the ability to track all subsequent species or ecological community listing by the federal government under the EPBC Act in case they have either a “significant” impact or an “indirect” impact. What the overarching MNES Standard has proposed as ‘indirect impact’ is quoted below:

> *Definitions in policy and guidance*
>
> “It is proposed that definitions for impact, including when and how impacts will be considered, may be further expanded in policy (e.g., in significant impact guidelines). This may include the following definitions:
>
> Direct impact: impacts of an action taken by a person. It is events or circumstances which do not have an intervening event or action but are caused, in a proximate sense, by carrying out the particular action itself.
>
> Indirect impact: (as defined in the EPBC Act) an impact that is not a direct result of the primary action, but which could reasonably be predicted to follow on from the action (later in time or farther away or off-site*).”* [6]

Cotton Australia recommends:

b) Where farmers are proponents of localised, small-scale agricultural proposals with limited and well understood impacts, the Standards’ requirements must be proportionate, practical, and not equivalent to those expected of major greenfield developments or mining projects. (As a general guide, where the practice is minor and routine, the application should be able to be easily completed by the landholder, without the need to engage outside consultants).

[6] P20 UPDATED DRAFT Policy Position Paper: MNES

3.4. ACCURATE TOOLS AND MAPS

In its simplest form, our members need to know how compatible agricultural land-uses such as pest management, weed control, and other productive land management activities can operate so that they are consistent with these reforms. This is not new ground, the 2018 Review of interactions between the EPBC Act and the agriculture sector raised this need.[7]

Landholders also need to have access to accurate maps and some recourse if it is found that the maps are inaccurate.

We note that the Queensland Globe was promptly updated to reflect the precinct attributes now captured by the EPBC Act reform for the Great Barrier Reef's catchment. However, we also understand that **the Globe EPBC related update has incorrectly identified irrigation systems as drainage lines**.

If poorly contextualised data is integrated into broader mapping and/or decision-support tools, it risks embedding those mis-characterisations into future maps and increases compliance uncertainty for landholders. This is a perverse outcome.

As the EPBC Act currently stands, the assumption is that the landholder is assumed to be in the wrong, unless they can prove otherwise. Added to this, the EPBC Act reforms have excluded any safe-harbour or grandfathering provisions for those who acted in good-faith.

To clarify the implications for Cotton Australia's Queensland growers we have been tracking Queensland's Dept Environment Tourism Science and Innovation's (DETSI) consultations on their draft Bioregional Plans[8]. These are being developed on the Australian Government's behalf as pilots, to guide how cumulative impacts to the environment should be managed in an area of economic importance under the EPBC Act.

As these draft Plans are designed for the Australian Government's decision maker, they only consider impacts on MNES, per the EPBC Act. For that reason, a Plan is information only and not regulatory. Importantly, unless there is an overlap with the federal MNES, the Plans do not consider Matters of State Environmental Significance (MSES) or Matters of Local Environmental Significance. To avoid confusion, the Bioregional Plans need to be linked or refer the user to the state level equivalent in some way.

Cotton Australia recommends

c) ***The Queensland Globe Great Barrier Reef Catchment makes a distinction between irrigation systems and natural drainage lines.***

d) ***There is a federal and nexus state between the forthcoming Bioregional Plans and those held by jurisdictions and this needs to be explicit in the Bioregional Plans via the inclusion of hyperlink or similar.***

e) ***Accompanying the Bioregional Plans is landholder guidance for those who are situated in the Plan's vicinity. This could include how to use the Bioregional Plan if they are upslope of a location, what impacts should be avoided or minimized, similarly if they are in a range of one or more of the species or ecological community listed at state and federal level.***

[7] Craik, W. 2018. *Review of interactions between the EPBC Act and the agriculture sector*. Independent report prepared for the Commonwealth Department of the Environment and Energy [https://dcceew.gov.au/environment/epbc/publications/review-interactions-epbc-act-agriculture-final-report]
[8] https://environment.qld.gov.au/management/planning-guidelines/bioregional-planning

4. Conclusion

Cotton Australia is consequently very concerned by the significant regulatory burden that has now been placed upon our members by these reforms.

We are already hearing anecdotally about the perceived barrier these reforms are causing. These are growers who have complied with existing Queensland legislation while developing irrigated cotton and mixed-cropping enterprises. In their view, if they were to consider the same today, they would not proceed with similar investments.

Our comments and concerns are informed by several decades of documented improvement undertaken by Australian cotton growers in many sustainability areas. (Our industry has developed PLANET. PEOPLE. PADDOCK. as the industry's framework to continue that trend.[9]) For our cotton growers, the value of economic, social and environmental sustainability to carefully managing the natural, human and economic resources they depend on is clear. It makes their farms more efficient, productive, and resilient to seasonal, economic or political shocks.

For further information about this submission, please contact Jennifer Brown, Senior Policy Officer on [redacted] or mbl [redacted]

[9] The suite of sustainability reports and resources can be found at: https://australiancottonsustainability.org.au/


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