



COTTON  
AUSTRALIA



**2025 LAND RELEASE REVIEW**

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# The 2025 Land Release Review

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 brief submission to the Department of Natural Resources and Mines, Manufacturing and Regional Rural Development (the Department) on the *2025 Land release Review – consultation paper*.

Cotton Australia considers that the protection and sustainability of land and water resources and enhancement and maintenance of landholder land access rights are of the utmost importance.

While we recognise that the resources industry offers potential economic benefits to Australia, without proper regulation and enforcement these industries also pose significant risks to the Australian Cotton Industry. Consequently, our long-held policy principles include:

- Protecting the productive capacity of agricultural land and water from mining and coal seam gas extraction activities.
- Opposing any mining and coal seam gas development unless and until it can be definitively proven that the development will have no impact on the productive capacity of the land or water our industry relies on.
- That any existing or approved mines or energy resource extraction sites are rehabilitated to their pre-development productive capacity, within five years of ceasing production.
- A mining or energy resource development approval must include a comprehensive rehabilitation plan, with clear and enforceable timeframes.

While it may be strictly outside the terms of this Review, Cotton Australia is firmly of the view that the Queensland Government must develop a policy that transparently identifies high value agricultural land and excludes it from being open to mineral and energy exploration and development.

Queensland has a limited supply of genuinely high-value agricultural land, and its productive capacity must be maintained for the good of the State.

In Cotton Australia's view, Resource Authorities to explore or develop on this land should not be issued. If an individual or a corporation is granted permission to explore, should they then find something, an expectation has been created that they should also be able to benefit from its exploitation.

Therefore, the Queensland government should clearly decide on "no-go" zones, and not issue exploration or extraction permits.

Cotton Australia recognises that there will be a wide range of views on what agricultural land deserves that protection, and suggests a reasonable starting point is the declared Strategic Cropping Lands (SCL), however the definition of SCL, and what protection should be given to such land needs to be subject to its own review, and wide community consultation.

## 2. Recommendations

1. Queensland's prime agricultural land is a rare and irreplaceable asset that must be protected and be excluded from any exploration or development Resource Authorities.
2. The Queensland Government should commence a review into the Strategic Cropping Land Act, with the aim of determining the appropriate mechanism to identify agricultural land that should be excluded from exploration or resource development authorities.
3. The Department MUST only use a competitive tender process for land tenure releases.
4. The *Pre-EOI call Stage* MUST include engagement with local governments and the community.

## Submission response

Cotton Australia's is using the online survey questions to frame its response.

<https://haveyoursay.nrmrrd.qld.gov.au/2025-land-release-review-consultation/surveys/2025-land-release-review>

1. How familiar are you with the land release process for resource exploration in Queensland?

Somewhat

2. What is your primary interest in the land release process? (Select all that apply)

Environment or agriculture sector representative

3. A key proposed change is to reduce the land release timeframes from 18 months to 10 months, so that it can be run on an annual basis. What are your thoughts on this change?

Neutral

4. How important is transparency in the land release process to you? Transparency includes clear communication about exploration priorities, landholder rights, consultation processes, criteria and assessments for allocating tenures, and how stakeholder concerns are considered in decision-making. (Rank level of importance on a scale of 1-5.):

**In Cotton Australia's view transparency is of the utmost importance.**

5. What factors do you think should be considered when deciding which land is released for exploration? (Rank the following in order of importance):

1st Agricultural use

Then - community & landholder considerations; environmental impact; economic potential; infrastructure availability, other

Cotton Australia notes that the *Regional Planning Interests Act 2014* requires a regional interests development approval for resource activities in areas of regional interest including, priority agricultural areas. However, highly productive agricultural land continues to be taken out of production in favour of resources sector.

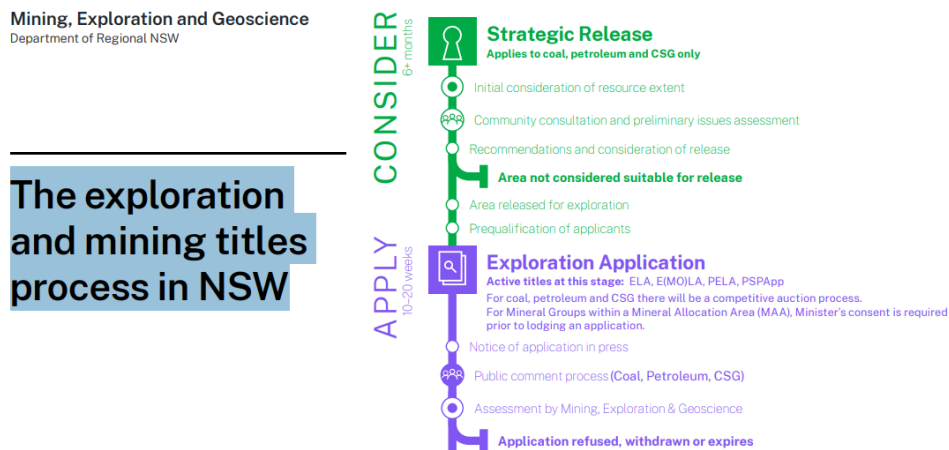
It is disappointing to see this situation is proposed to continue, as set out in the proposed new streamlined competitive tender process, Attachment 1. For example, the Pre-EOI call stage simply states "identify potential constraints" but fails to also suggest that some areas should be excluded from the get go.

It is Cotton Australia’s view that the best agricultural land remains available for food, fibre, foliage and increasingly fuel production. This land is rare and irreplaceable; its long-term value and contribution to the state’s economy are not being appropriately considered by this omission.

**Cotton Australia recommends that areas decreed as Strategic Cropping Land should be excluded from any exploration priority assessment (Subject to a review of the SCL Act).**

To ensure this occurs Cotton Australia proposes that the steps outlined in Attachment 1 are reframed to include such an exit to the process. We note that the flowchart from the NSW “The exploration and mining titles process in NSW” document could be adapted for this purpose.

As the excerpt below shows, such an exit occurs under the “CONSIDER” stage “Area not considered suitable for release”.



Please refer to:

<https://www.resources.nsw.gov.au/sites/default/files/2022-11/MEG-Titles-Process-A4.pdf>

- The department is considering allowing direct applications for land tenure in some cases, rather than always using competitive tendering. What are your thoughts on this approach?

**Cotton Australia strongly opposes the Department allowing direct applications for land tenure in some cases, rather than always using competitive tendering.**

Cotton Australia is also alarmed by this suggestion which is also currently stated as fact, in the 2025 Land release review QAs sheet, as per FAQ below:

Q. Will I be able to request that land is released for exploration?

Yes, the new process still includes an expression of interest stage, this allows explorers to express interest in land.

For consistency this ambiguous text needs to be reframed to indicate that the *Pre-EOI call Stage's* advance work has been the sole authority on what can be released under a future EOI call.

Which raises Cotton Australia's other concern, which also relates to Questions 7-9:

7. Do you think the proposed process effectively considers environmental, agricultural, and community interests?  
No – see explanation below.
8. Do you have any concerns about how these proposed changes may be interpreted by different stakeholder groups?  
Yes – see explanation below.
9. Should any additional measures be taken to address environmental and community concerns?  
Yes, see explanation below.

**Cotton Australia asserts that the *Pre-EOI call Stage* MUST include engagement with local governments and community**

Cotton Australia is concerned that the advance work during the Pre-EOI Stage does not include engagement with local governments and the community. As currently set out by Attachment 1, this will only occur in the EOI evaluation stage.

It would be unfortunate for valuable local knowledge held by local governments in regional Queensland not being considered prior to this step. For example, existing infrastructure, transport corridors and workforce capability. Surely the contribution from this sector of the economy should also be an input to the newly created Resources Cabinet Committee. We note this would complement representations from the Queensland Resources Council, Coal Australia, Australian Energy Producers, and the Association of Mining and Exploration Companies.<sup>1</sup>

10. How would you prefer to receive updates and notifications about land releases?  
Email
11. What are your primary concerns about the current land release process? (Rank the following in order of concern):  
Agricultural impacts, Community consultation, Transparency; Environmental impacts;  
Lengthy approval times;

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<sup>1</sup> <https://statements.qld.gov.au/statements/102398>

12. If you have other concerns about the current land release process, please specify.

Yes – see explanation below.

13. What improvements would you like to see in the land release process?

Yes – see explanation below.

14. Are there any aspects of the land release process that you feel have not been addressed in this survey?

Early identification and elimination of high-quality agricultural land must be prioritised to ensure certainty for projects and land-owners. Only when we find a balance between these competing regional land uses will the Queensland government be able to realise its agricultural aspirations of its “Strategic priorities for Primary Industries Prosper 2050”<sup>2</sup> and its definition of sustainable coexistence into the future.

*‘Sustainable coexistence’ signifies a balanced empathetic and forward looking approach, where industry and community thrive together, valuing both people and the environment, while cultivating enduring relationships.<sup>3</sup>*

15. This survey is confidential and can be completed anonymously. However, if you would like to be contacted for follow-up or to share more insights, please leave your contact details below (e.g., email or phone).

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### 3. Conclusion

For a vibrant and thriving agricultural sector providing food, fibre and amenity to all Queenslanders it is imperative to protect existing prime agricultural land.

Without the right land to begin with, it is not possible to maintain the food security that is taken for granted domestically, let alone the sector support the communities that benefit from employment and the economic opportunity agricultural production and processing creates.

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<sup>2</sup> <https://www.dpi.qld.gov.au/news-media/campaigns/prosper2050/deliver/priority>

<sup>3</sup> <https://cqld.org.au/about-us/>



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