



Advancing Australian Cotton

Environment Law Reform Taskforce

Via EPRconsultation@dcceew.gov.au

29 May 2026

National Environmental Standard for Matters of National Environmental Significance (MNES Standard) Consultation

Dear Madam/Sirs,

Cotton Australia welcomes the opportunity to provide feedback to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) on the proposed *National Environmental Standard for Matters of National Environmental Significance* (MNES).

Introduction

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.

Submission

Cotton Australia supports the submission made by the *National Farmers' Federation* (NFF) and endorses all the concerns and recommendations raised.

We make this brief submission to strongly reiterate NFF's position; we too do not support the MNES Standard that has been presented. In our view it does not provide a clear, practical, or viable pathway for our members to assess their obligations or determine whether routine farming activities have a Significant Impact on a MNES.

It is unfit-for-purpose and cannot be progressed in its current form.

.2.

We also are very concerned by the significant regulatory burden that has now been placed upon our members by these reforms. The 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, is causing significant confusion and distress amongst members.

For instance:

- Will changing existing irrigation infrastructure to bankless systems, a water use efficiency measure, be compliant with avoiding the various framing of “significant impact” currently listed in the MNES Standard?
- Can a new fence line subdividing an existing paddock be installed without the need for a Self-Assessment?
- How are state requirements for managing Invasive Native Species compliant with the draft Standard?
- What are practical examples of intensification. Are these routine and best practice examples acceptable – rotation of crops that have different sowing rates, changing fertiliser rates and manner of application?

Should the Commonwealth proceed with finalising the MNES Standard through the current process, significant amendments are required to make it workable for agriculture.

Cotton Australia strongly recommends as a minimum:

- Plain English definitions
- Clear descriptions of what is and is not an acceptable practice (i.e., examples that are grounded in the reality of production systems and reflective of what is a legitimate practice)
- Accompanying guidance documentation that avoids legal jargon
- Better mapping; and
- Increased resourcing to support extension and communication.

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.

[The suite of sustainability reports and resources can be found at:

<https://australiacottonsustainability.org.au/>]

The value of economic, social and environmental sustainability to cotton growers is clear: carefully managing the natural, human and economic resources they depend on makes a farm more efficient, productive, and resilient to seasonal, economic or political shocks.

.3.

Our industry's approach towards biodiversity is to collaborate on regionally appropriate actions. Specific to native vegetation we have been collaborating with Natural Resource Management (NRM) Regions Australia and other partners to support cotton farms contributing directly to the priorities identified by NRM organisations in each region.

A shared understanding, based on clear definitions and joint responsibilities, have been the foundation of this approach. We would welcome the opportunity to work in partnership with DCCEE and other NFF members to develop pragmatic and understandable MNES Standards. However, as the document currently stands the MNES needs to be withdrawn and revised.

For further information about this submission, please contact Jennifer Brown, Senior Policy Officer on jenniferb@cotton.org.au or mbl 0404 803 14.