



Advancing Australian Cotton

Environment Law Reform Taskforce
Via EPRconsultation@dcceew.gov.au

9 June 2026

National Environmental Standard for Environmental Offsets

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 National Environmental Standard for Environmental Offsets.

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.



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Submission

Cotton Australia is making this brief submission as a member of the National Farmers Federation and therefore endorses the concerns raised their separate submission about the proposed Environmental Offsets.

Namely, proposed Environmental Offsets Standard is not yet sufficiently clear or practical for implementation in agricultural landscapes. There is a need to clearly define how key concepts will work in-practice so that landholders and proponents alike understand their obligations and have confidence to engage with the proposed framework. This includes understanding how concepts such as net-gain are to be satisfied in-practice and how the Principle-led approach to implementation will be undertaken in a manner that is actually consistent with the Objectives and Outcomes of the Standard and broader *Environment Protection and Biodiversity Conservation (EPBC) Act 1999*.

Cotton Australia, like the National Farmers Federation, is of the view that in the absence of a consolidated reform package, it is difficult for industry to assess the implications of the proposed framework including how Standards will interact with each other.

In order to properly assess the cumulative impact of the reforms, the full suite of regulations and supporting materials must be released. At present, there is no visibility of how issues of overlap and inconsistency across Standards will be resolved.

Significant amendments are required to make the proposed Environmental Offsets Standard workable and fit-for-purpose.

We therefore reiterate the following points of concern:

- A commitment to publishing the full suite of proposed Standards together rather than continuing with the staggered approach to enable industry to better understand the full regulatory, operational, and economic implications of the proposed framework and identify unintended consequences or address the many areas of duplication and overlapping requirements present across them;
- Clarify the relationship between the Objectives, Outcomes, and Principles through consistent drafting. This includes whether satisfaction or application of the Principles is intended to be the operative test to demonstrate consistency;
- Amend section 7(4) of the draft Legislative Instrument so that a decision-maker will be taken to be satisfied that a decision is consistent with the Standard where the specified requirements are sufficiently clear and are understandable, applicable, and interpretable;
- Make clear that environmental offsets are only required for residual Significant Impacts on MNES and their critical habitat, and that referral or assessment does not automatically trigger an offset obligation;



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- Develop practical examples of what avoidance, mitigation, and repair look like in an agricultural, marine, and fisheries context where environmental offsets are determined to need consideration post-referral;
- Clearly describe how compatible agricultural land-uses such as grazing, pest management, weed control, and other productive land management activities can operate on environmental offset sites where they are consistent with the intended environmental outcome;
- Clarify how the Environmental Offsets Register will address privacy considerations and questions around commercially sensitive data and information; and
- Ensure the Relevant Area Principle can be practically applied in a real-world context, understanding that cultural considerations make offsets substantially more challenging to identify and secure.

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://australiancottonsustainability.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.

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