

Review into the Impact of Key PALM Scheme Deed and Guidelines Settings

Cotton Australia is the peak representative body for the nation's cotton growers, advocating for up to 1,500 farms located primarily in New South Wales and Queensland, with additional operations in the Northern Territory and Western Australia. The organisation works closely with growers and industry stakeholders to ensure the long-term viability of the Australian cotton industry.

Its mission is to support a globally competitive, sustainable, and community-valued cotton sector. Cotton Australia drives the industry's strategic direction, maintains a strong commitment to research and development, promotes the sector's strength and reputation, manages sustainability reporting, and implements policy initiatives that reflect the needs of growers.

However, despite these efforts to strengthen the industry, labour remains a persistent challenge. While the Pacific Australia Labour Mobility (PALM) scheme has played a role in addressing workforce shortages across agriculture, it is misleading to suggest that it consistently delivers a productive workforce or fully supports worker welfare and wellbeing. These claims overlook significant gaps in pre-departure preparation, health screening, and safety education issues that continue to affect both farm operations and the lives of workers.

From a productivity standpoint, many PALM workers arrive in Australia with limited or no experience in operating and maintaining agricultural machinery. This lack of foundational mechanical knowledge poses serious challenges, particularly in sectors like cotton, which rely heavily on advanced equipment and technical precision. Cotton growers have voiced concerns that PALM workers are not a viable source of labour for their operations due to the high level of skill required to operate cotton pickers, tractors, and irrigation systems. Without basic mechanical competency, these workers cannot contribute effectively, and employers are forced to invest time and resources into training that could have been delivered prior to arrival.

To address this, there is a clear need for structured, pre-departure training programs in workers' home countries. While Registered Training Organisations (RTOs) exist within Australia, access to them in regional, rural, and remote areas where PALM workers are most often employed is limited. This lack of localised, on-farm training infrastructure places the burden squarely on employers, many of whom are already operating with stretched resources and limited capacity to deliver comprehensive training. Without external support, these employers must take on the responsibility of teaching basic machinery operation, maintenance, and workplace health and safety (WHS), often at the expense of productivity and operational efficiency. Establishing offshore RTOs would ensure that workers arrive with essential skills, easing pressure on rural employers and improving outcomes for both parties.

Another critical barrier to productivity and safety within the PALM scheme is language. Many workers arrive in Australia with limited or no English proficiency, which significantly hampers their ability to follow instructions, understand safety protocols, communicate effectively with supervisors, and integrate into the

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broader community. In high-risk environments such as farms where machinery, chemicals, and livestock are involved clear communication is essential. Misunderstandings due to language gaps can lead to serious accidents, inefficiencies, and frustration for both workers and employers. To address this, basic English language instruction should be embedded into the pre-employment phase of the PALM scheme. Workers should be taught functional English relevant to farm work, including terminology around equipment, safety procedures, and emergency response. This would not only improve workplace safety and productivity but also empower workers to engage more confidently with their surroundings, fostering a more inclusive and respectful working environment.

Equally concerning is the welfare and wellbeing of PALM workers, particularly in light of the number of deaths reported in recent years. While many of these fatalities are not directly linked to employment, they often stem from pre-existing health conditions or preventable accidents. This raises serious questions about the adequacy of current health screening processes. More rigorous and detailed medical assessments must be conducted before departure to identify underlying health issues that could be exacerbated by the physical demands of farm work. Ensuring that workers are medically fit not only protects them but also reduces the emotional and logistical strain on host communities and employers.

Beyond physical health, there is an urgent need for cultural orientation and safety education. Several incidents have involved alcohol-related accidents, including drowning while swimming intoxicated and road fatalities linked to drink driving. These tragedies point to a lack of awareness about Australian laws, risks, and social norms. Pre-departure programs must include robust education on alcohol consumption, water safety, and road safety. Workers should be made aware of the dangers of swimming while intoxicated and the legal consequences of drink driving. These are not just lifestyle concerns; they are matters of life and death.

Driving competency remains a significant concern, as many PALM workers arrive with little to no experience navigating Australian roads. Many of these roads are poorly maintained and stretch across vast distances between farms and nearby towns. This poses risks not only to the workers themselves but also to the broader community. To mitigate this, driving tests should be administered in workers' home countries before arrival. This would ensure that workers understand road rules and are competent behind the wheel, reducing the likelihood of accidents and improving overall safety.

The PALM scheme has the potential to be a model of ethical labour mobility, but it must evolve to meet the real-world challenges faced by workers and employers alike. Productivity and wellbeing cannot be achieved through placement alone. They require preparation, education, and ongoing support. By investing in pre-departure training, health screening, language instruction, and safety awareness, Australia can ensure that PALM workers arrive not just ready to work, but ready to thrive.

Furthermore, if the scheme is to be embraced by all sectors of agriculture, including high-skill industries like cotton, it must address the specific needs of those industries. The current one-size-fits-all approach does not

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serve the nuanced demands of modern farming. Without targeted training and skill development, PALM workers will continue to be excluded from sectors that require technical proficiency, limiting their employment opportunities and reducing the overall effectiveness of the scheme.

It must also be realised that even with significant reform, the PALM scheme can only ever be one part of the casual labour mix required for Australian agriculture. The Working Holiday Maker Visa (WHMV) continues to provide both agriculture and the wider regional economy with an extremely important pool of casual workers who bring a diverse range of skills and flexibility. Cotton Australia remains highly supportive of the development of a dedicated Agricultural Visa, one that recognises the unique demands of the sector and provides a sustainable, skilled, and scalable workforce solution for the future.

In summary, while the PALM scheme has made strides in providing labour to Australian farms, it falls short in delivering a consistently productive and well-supported workforce. To truly fulfil its promise, the scheme must be restructured to include comprehensive pre-departure training, detailed health checks, driving assessments, language instruction, and safety education. Only then can it meet the expectations of employers, protect the wellbeing of workers, and contribute meaningfully to the future of Australian agriculture.

If you would like to discuss any part of this submission on the Review into the Impact of Key PALM Scheme Deed and Guidelines Settings, please call me on 0448 094 883 or by email on pauls@cotton.org.au

Yours faithfully,

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