



COTTON
AUSTRALIA

Advancing Australian Cotton

28 November 2018

Department of Environment and Science
400 George Street
Brisbane QLD 4000

Email: ISRS.Consultation@des.qld.gov.au

Draft End of Waste Code Biosolids (ENEW07359617)

Dear Madam or Sir

Cotton Australia is the key representative body for Australia's cotton growing industry.

While Queensland's cotton production is highly variable, the State's 600 growers often produce between 1 million and 1.5 million bales each year. The value of that production ranges between \$500 million and \$900 million (including the value of cotton seed) farm gate annually. Our growers in Queensland reside throughout South-West and Central parts of the state.

Cotton Australia is an active member of the Queensland Farmer's Federation ('QFF') and endorses its comments regarding the *Draft End of Waste Code for Biosolids*. If there are any perceived inconsistencies in position between organisations, the position expressed in this submission is that of Cotton Australia's.

For cotton growers nitrogen (N) is a significant input cost, so much so that our Cotton Research and Development Corporation has 'productive resource efficiencies' as a key research theme in order to increase farm profitability and in turn optimise nutrients applied by fertilisers. The 'More Profit from Nitrogen' research program is a case one example, its project objective is nitrogen use efficiency (NUE) or a reduction of the amount of N required in producing each unit of product.

Biosolids can be an alternative source of nitrogen as well as phosphorus and potassium for cotton growers. Making use of biosolids also closes the loop for nutrients, providing an alternative to the ever declining stocks of inorganic phosphate. Consequently having access to biosolids is of utmost importance and Cotton Australia takes this opportunity to reiterate a number of concerns raised by QFF.

Cotton Australia is disappointed we did not have the opportunity to provide an end user perspective as the draft Code was being prepared. We also note that the agricultural sector has not been included on the Technical Advisory Panel for the *Draft End of Waste Code Biosolids*.

We are particularly concerned that the proposal will change the point of determination for the biosolids to be classed as a resource. For example, testing at the treatment plant would not take into account the material being composted then made into pellets, and in turn may not accurately represent final levels of nutrients or contamination.

.2.

Proposed changes to buffer zones are also quite problematic. Changing the distance to surface waters from 50m to 200m in flat areas, from 100m to 200m for downslopes, and from 5m to 200m for upslopes, will greatly reduce the amount of agricultural land that could apply biosolids for beneficial use.

For the reasons outlined above Cotton Australia:

- does not support the proposed *Draft End of Waste Code Biosolids* in its current format, and
- seeks an immediate extension of the existing Beneficial Use Approval (BUA) for Biosolids in order for a new or significantly amended Code to be developed.

If you would like further information on this submission, my contact details are Email: jenniferb@cotton.org.au or phone 02 9669 5222.

Yours sincerely



Jennifer Brown
Policy Officer