

10 May 2018

Attn Andrew Burnett

Department of Natural Resources, Mines and Energy
PO Box 15456, City East, Qld 4002
Submitted by email: largescalesolar@dnrme.qld.gov.au

Attn Vanessa Neilsen and Emily Reading

Department of State Development, Manufacturing, Infrastructure and Planning
Submitted by email: vanessa.neilsen@dsmip.qld.gov.au
: emily.reading@dsmip.qld.gov.au

**Queensland Solar Farm Guidelines –
Practical guidance for communities, landowners and project proponents
and
Queensland solar farm guidelines: Guidance for local governments**

Dear Mr Burnett, Ms Neilsen and Ms Reading

Introduction

Thank you for the opportunity to comment on the documents: “Draft Queensland solar farm guidelines: Guidance for local governments” and the “Practical guidance for communities, landowners and project proponents”.

Cotton Australia is the key representative body for Australia’s cotton growing industry, supporting about 1,200 cotton farming families in NSW, Queensland and now into Victoria. These 152 Australian regional communities produce around 2.7 million bales from across the 263,339 hectares of growing area. This generated over \$2.3billion in export earnings for the 2016-17 season, making the cotton industry an integral part of the Australian economy.

Cotton Australia endorses the separate representations that the Queensland Farmers’ Federation (QFF) on this matter. As the cotton industry’s peak body we have encouraged our members to attend the public consultation sessions but would also like to take this opportunity to make the following observations.

General observations:

- Our members recognise the benefits of increasing the amount of energy generated from renewable and low carbon technologies to secure energy supply, reduce greenhouse emissions and stimulate investment in new jobs and business.
- Cotton growers are increasingly looking for alternative options to manage their energy use on farm because cotton is one of the most highly mechanised broad-acre sectors in Australia. It is not surprising then that the solutions chosen often include renewable energy technology, as well as a complementary demand management strategy.

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- While welcoming the potential energy and economic benefits that large-scale solar projects can provide, Cotton Australia considers both protecting high value agricultural land and preserving the amenity of traditional cotton growing regions to be of utmost importance. Similarly a potential project should be considered on its environmental, social and economic benefits during its life as well as at its end of life.
- It is Cotton Australia's view that the land concerned is all of the community's asset which is being 'loaned out' during the life of the solar facility. In that respect the land in question needs to be returned in a fit and proper order for the community to continue to derive benefit (aesthetic or economic) from it.
- Cotton Australia wishes to raise our concerns about the performance and credibility of the company undertaking the proposed project. They need to demonstrate that they have the technical competence and financial security to undertake the project as well as deliver against their development consent conditions. This includes the ability to restore to the pre-development productive capacity of the land within five years of ceasing production.
- It is Cotton Australia's recommendation that just as security deposits and bonds are used to secure decommissioning activities for mining projects, the same requirement should exist for large scale solar facilities. Also that the quantum of security held is adequate, and it needs to be reassessed during the project's life and site's rehabilitation, particularly in light of the risk of future insolvency of a company.

As a final comment Cotton Australia acknowledges that when making planning assessments local governments need the flexibility to consider aspects unique to their region, that respect the Guidelines can act as a good checklist to ensure a broad range of aspects are considered. However being 'only a guide' means cherry-picking may occur, hence a "Solar Code" as strongly advocated by QFF is our preferred approach.

Should you have any questions regarding our submission please do not hesitate to contact me on 02 9669 5222 or jenniferb@cotton.org.au.

Yours sincerely,



Jennifer Brown
Policy Officer
Cotton Australia