

16 December 2021

IESC Secretariat
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601
Submitted by email: IESCsecretariat@environment.gov.au

Public consultation - Information guidelines for proponents preparing coal seam gas and large coal mining development proposals

Dear IESC Secretariat

Cotton Australia welcomes the opportunity to provide comment and, as the industry's representative body to speak on behalf of cotton growers regarding the updated *Information guidelines for proponents preparing coal seam gas and large coal mining development proposals*.

Our members include approximately 1,400 cotton farming and cotton ginning businesses, across 152 regional communities. These are predominantly in New South Wales and Queensland with an increasing number in Victoria and Northern Australia.

Notably, 90% of cotton operations are family farms that also grow other crops like sorghum, soybeans, wheat, and have livestock. While cotton production does vary considerably from season to season the crop generates for the annual national economy between \$1.5 billion and \$2.5 billion.

The Australian cotton industry fosters a world-class agricultural industry that is sustainable, valued for its economic and social contributions and produces very high-quality cotton in demand around the globe.

While we recognise that both the mining and CSG industries offer potential economic benefits to Australia, without proper regulation and enforcement these industries also pose significant risks to the Australian cotton industry. Our long-held policy principles include:

- Protecting the sustainability of aquifers and surface water sources that service irrigated and dry land cotton production and their communities.
- Protecting high value agricultural land from CSG extraction and mining activities.

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- Minimising the social impacts and implications of all mining project activities on both rural communities and miners themselves.
- Preserving the amenity of traditional cotton growing regions. This includes, but not limited to, impacts from dust, noise, air-blast, light, traffic movements, vibration, the loss of visual amenity and access to passive recreation areas enjoyed by the local community.

Cotton Australia acknowledges that IESC updates the Information Guidelines at regular intervals to ensure the content reflects current science and practice for use by large scale coal and CSG proponents. More importantly, we like other community groups and NGOs, consider the IESC's guidance to be a trusted source to 'ground truth' these proposals. For example, where the IESC has used 'should' it is Cotton Australia's view 'must' be applied as the rule rather than exception.

Rather than making technical comments our submission is brief, offering some suggestions specific to the Checklist's (pp14-26) layout and readability. Namely on page14, paragraph 3:

A project may not need to address all items included in the checklist. For example, a coal mining proposal will not need to address the parts of the checklist related to CSG well construction and operation while a CSG proposal will not need to address the voids and landforms section. Proponents should provide justification and any supporting data and information if not addressing any sections of the checklist

Cotton Australia notes that a coal project will not require the elements which relate to CSG well construction and operation and visa a versa. Also, that both justification and supporting data plus information should be included if any checklist section is not addressed.

However, what is not clear is to what 'section' refers to, is this the headings which generally correspond with the preceding pages or the actual individual cells under a heading or sub-heading? To clarify could the checklist list use heading that are numbered #1, #2 etc or because of the slight differences with the proceeding pages use A, B, C etc.

Additionally, is there any order to which the items per category are to be read: left to right, down the column for section first? Similarly, is there an order to which to apply this item or a between priority the statements grouped in each headed area? Some words in the text proceeding the table would make this clear. This would also help clarify if each cell entry is a stand-alone item that can be selected or ignored (on the proviso of data and justification being provided).

As a final comment, Cotton Australia is highly supportive of the work IESC undertakes and its significant contribution to the knowledge of groundwater systems and potential management approaches for industry.

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