

RECOMMENDATIONS AND RESPONSES – 4TH ENVIRONMENTAL ASSESSMENT

GHD recommendation:

1. Continue to undertake updates to the existing myBMP website to ensure all information is current and weblinks and video content are accessible. Regular updates to continue to both the main website and module content to ensure information remains current.

Cotton industry response: Agree and being actioned

The industry aims to update each module every two years to ensure all information is current and accessible. While there are inevitably a small number of links that become out of date during that cycle in such an extensive list of subjects, appropriate resources are being assigned to keep information current and accessible whenever possible. A potential revamp of the myBMP platform will explore if this process could be improved.

2. Continue to increase the transparency and consistency of reporting of the number of growers both registered and certified with the myBMP program. This information should be available on the myBMP website or a publicly available platform as well as reported in the relevant annual publications eg the Better Cotton and Cotton Australia Annual Reports.

Cotton industry response: Agree – Strategic review the best way to action

Data for myBMP is available online for interested stakeholders at cottondata.com.au. In line with the recommendations, the cotton industry is planning a review and revamp for the myBMP program. As part of this review, there is a plan to further enhance that data availability to include information not currently available online. The cotton industry is planning to update the digital technology to enable the information enhancements and at that time the information will be made available on the myBMP website and in the Cotton Australia Annual Report.

3. Ensure a whole-of-industry commitment to increasing the uptake of myBMP certification. Consider new research into identifying real and perceived barriers to uptake.

Cotton industry response: Agree – Strategic review the best way to action

The cotton industry is planning a review and revamp for its myBMP program. There is a shared commitment to increasing the uptake of myBMP certification as the industry understands the universal benefits of the program for growers and the flow-on benefits, including better economic outcomes, more vigilant health and safety protocols and best practice insect, pest and disease management, to name a few.

Recently the industry's first full time myBMP Sustainability Implementation Officer in Australia was appointed and one of the functions of that role is to coordinate and accelerate myBMP training and implementation strategies across the industry while developing regionally specific myBMP targets and engagement strategies. This role and

others within the myBMP office are dedicated to ensuring the commitment and overcome barriers to uptake.

4. Evolution and possible transformation of the myBMP program is required over time toward a performance-based tool that both adds value to participating farm businesses and provides clear outputs and data to support the implementation of the industry's sustainability agenda.

Cotton industry response: Agree – Strategic review the best way to action

The myBMP program continues to evolve as it has since it was established in 1997 and is again under review with the object of enhancing the program. The myBMP program today is vastly different from what it was over 25 years ago and it will continue to evolve to meet the changing environment for cotton growing in Australia.

The industry's sustainability agenda is established and overseen by the industry-wide Sustainability Working Group (SWG) and the broader Australian Cotton Sustainability Reference Group which includes various stakeholders from inside and outside the industry. Cotton Australia's five year Strategic Plan details five key priorities for the next five years including sustainability with KPIs for myBMP directly linked to understanding and overcoming barriers to certification, restructuring the certification process and accelerating grower uptake, as well as global targets.

5. The sustainability framework and reporting process should continue to move toward science-based targets, acknowledging the difficulties of achieving ambitious targets in a complex system. The SWG has already undertaken considerable work in this area and should be encouraged to continue.

Cotton industry response: Agree and being actioned

As identified, science-based targets are part of cotton's ongoing agenda within the sustainability framework. Cotton's sustainability advisor is working closely with all industry decision-makers to explore if science-based targets (a formal methodology designed for use by companies, not by industries) are feasible and can be adapted by the cotton industry. If not, the industry will explore other targets that are informed by science enabling robust and non-arbitrary targets to be set.

6. Continue to work with the respective government agencies to include, where available, information on the status of water compliance in major cotton growing regions (e.g. number/size of breaches compared to total number of holdings) in industry sustainability reporting, as was flagged in the 2020 stakeholder consultation report on the setting of industry targets and indicators for the Australian cotton industry.

Cotton industry response: Agree and being actioned

Cotton Australia regularly engages productively with water regulators, department and government officials, as part of the policy engagement process and as a member of the relevant irrigation groups. Compliance breaches were reported for the first time in the 2021-22 Cotton Industry Sustainability Update.

7. Continue to support research and trial work that is underway to better understand the impacts of fish entrainment and encourage broader adoption by cotton growers and infrastructure operators of screening on irrigation pumps and/or other identified mitigation measures.

Cotton industry response: Agree and being actioned, within available budgets

Work is underway in these important areas and, where possible growers are encouraged to protect water life by irrigation screens to avoid entrainment. Cost is an issue but the industry is working with various stakeholders to gain further insights as to how cotton growers and irrigators can improve their knowledge and understanding of mitigating measures and how to implement them.

8. Use regionally targeted approaches to increase the level of biosecurity planning to ensure sound biosecurity practices are in place on-farm. There is always room for improvement in this area to ensure that growers are prepared and have strategies already in place for any future outbreaks or incursions of new pests, weeds or diseases.

Cotton industry response: Agree and being actioned

Biosecurity remains an area of concern for all cotton growers and as an industry we are connected with relevant government bodies to respond quickly but also to take the necessary measures to guard against threats. Training in these issues is part of the industry's myBMP program and research extension program, CottonInfo. Certified growers have procedures in place to mitigate against any threats but also to prevent incursion of any threats from property to property, region to region.

9. Continue to work with the broader agricultural community to increase the understanding and awareness of off target spraying to minimise the potential for environmental impacts.

Cotton industry response: Agree and being actioned

Work is ongoing and proactive in a concerted effort to address the issue of off target spraying. Cotton growers have reported many millions of dollars damage through spray drift over recent seasons and that is unacceptable. The industry has in place a range of education, training and communication initiatives and works with groups like SOS (Stop Off-target Spraying) to prepare for and respond to any reported spray drift incidents while issuing warnings about unfavourable spraying conditions.

Cotton Australia conducts numerous training workshops throughout growing regions and undertakes advertising in traditional and social media to ensure a high awareness of the issues and preventative measures, while highlighting the importance of reporting techniques to alert nearby properties of upcoming spraying events.

The Cotton Research & Development Corporation (CRDC) and the Grains Research and Development Corporation have jointly invested \$5.5 million in a five-year partnership to develop a spray drift hazardous weather warning system that will provide real-time weather data and alerts to growers and spray operators about the presence of

hazardous inversions. The system, Weather and Networked Data (WAND) is operational across the Qld and NSW cotton growing valleys.

- 10.** Engage partner industries and service providers to aid improvement in on-farm storage, handling and waste practices.

Cotton industry response: Agree – Coordinated approach with other sectors planned
The SWG is planning the development of a cross-sector approach to encourage the provision of drumMUSTER to Councils that don't currently offer this service. On-farm storage, handling and waste practices are key areas of focus for the cotton industry. The industry continues to engage across agriculture to determine a better way of dealing with various forms of waste across farming operations.

- 11.** Undertake regionally targeted education and awareness campaigns to improve storage, handling and waste practices on farm. This should be supported by the industry's broader extension and myBMP programs.

Cotton industry response: Agree and being actioned
As reported in the 2021-22 Sustainability Update, a surprising amount of circularity already takes place on cotton farms. Notwithstanding, this continues to be a focus for Cotton Australia's Regional Managers who engage directly with growers on a day-to-day basis. Where possible, and in alignment with industry events like farm days and conferences, experts provide the latest information and strategies for improvements in these areas which as stated above are also a focus of myBMP certification.

- 12.** The SWG should undertake a materiality assessment of waste management to consider if targets and indicators, or other explicit reporting of industry performance in this area is required.

Cotton industry response: Agree – Materiality assessment rated waste management as important
As reported in the 2021-22 Sustainability Update, the industry conducted a materiality assessment of waste management in December 2022. This assessed circularity at the farm level as being important, but less important (or material) than the topics already being managed within PLANET. PEOPLE. Paddock. This means circularity and waste management will continue to be managed but other topics will be given priority, within the resources industry has available.

- 13.** Continue cross sector work to establish indicators and targets for biodiversity and soil, including continuing industry specific investigations on nitrogen use and links to emissions.

Cotton industry response: Agree and being actioned
The cotton industry has been working since September 2021 to develop a new model to provide better coordinated support to farmers to preserve or enhance native vegetation. The industry is also providing input to the National Soil Strategy to

develop nationally consistent soil health indicators and continues to invest in research on improving nitrogen use efficiency.

- 14.** Increase extension efforts to assist grower understanding and awareness of how they can increase their natural capital on farm.

Cotton industry response: Agree and being actioned

The cotton industry has been working since September 2021 to develop a new model to provide better coordinated support to farmers to preserve or enhance native vegetation. This work is in collaboration with NRM Regions Australia and the NRM organisations in regions where cotton is typically grown. The cotton industry also began Australian-first work in May 2023 to examine the potential of assessing natural and social capital at industry scale. As referenced previously, extension efforts have also been improved through the key cotton industry bodies. This occurs at a local level through Cotton Australia Regional Managers, through the dedicated myBMP staff, through the research extension program CottonInfo, and through CRDC.

- 15.** Continue cross sector work to establish indicators and targets for greenhouse gas (GHG) emissions and carbon storage and ensure alignment with government policies and programs on the establishment of agreed methodologies.

Cotton industry response: Agree and being actioned

A common approach to sector-level accounting for GHG emissions was released in April 2023 after a long period of development. This work gives guidance on how, for example, emissions and removals should be accounted at the sector level for farms that have cotton, grain and livestock. Industry has also advocated for the adoption of GHG calculators developed by the University of Melbourne's Primary Industries Climate Change Centre, to be consistent with other broadacre industries who use the same tools. CRDC is an investor in Agricultural Innovation Australia's Environmental Accounting Platform which has developed a cross-sectoral carbon footprint calculator based on the University of Melbourne GHG calculators.

- 16.** There is a need for increased extension to growers in the area of energy, emissions and climate change. Due to the complex nature of climate change, carbon and GHG reporting, there is a role for industry to provide high-level information and share case studies and learnings amongst industry participants, with specialist, likely private sector, services required to offer growers more specific information to support on-farm decision making in respect to investment and/or market participation in this area.

Cotton industry response: Agree and being actioned in collaboration with other sectors

The cotton industry continues to invest in better extension of trusted advice on how to reduce emissions, increase removals, increase soil organic matter, and how to approach the market for carbon. Future plans include providing a cotton industry carbon hub to provide this information, and to collaborate with other industries to more efficiently and consistently deliver this information to all farmers. CRDC is a partner in the recently



announced CRC for Zero Net Emissions from Agriculture which will help provide a cross-sectoral focus on all these issues.