

**National
Farmers
Federation**

**Inquiry into Factors
Shaping Social Licence
and Economic
Development Outcomes
in Critical Mineral
Projects Across Australia**

March 2026



The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade, and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

NFF Member Organisations



Introduction

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the *House of Representatives Standing Committee on Primary Industries*. NFF supports the responsible development of Australia's critical minerals sector and recognises the significant opportunity it presents for regional and national economic development. Development must occur in a manner that recognises agriculture as a primary land-use and a fundamental pillar of local, State, Territory, and national economies. Farming families must be recognised as key stakeholders in decisions affecting land-use change on their land, and development should prioritise coexistence between land-uses wherever possible.

NFF policies on *Prime Agricultural Land*, *Land-Use*, and *Industry Engagement Guidelines for On-Farm Activities* are attached at Attachment 1 to 3 respectively and are to be read in conjunction with this submission.

The Critical Minerals Opportunity

Australia holds significant reserves of critical minerals and is well positioned to meet growing global demand for secure supply chains. Our nation ranks among the world's leading reserves and suppliers of critical minerals. According to *Geoscience Australia*, Australia holds approximately 16% of global tin reserves, 13% of aluminium, 9% of manganese ore, and 7% of graphite. We also remain the world's largest producer of lithium and a leading producer of rutile, zircon, and other rare earth elements¹.

Critical mineral deposits are dispersed across the Australian continent and present a significant opportunity for regional and national economic development (see graphic below). A substantial distribution of these resources are located in rural, regional, and remote areas where agriculture is a dominant land-use (i.e., grazing, dryland cropping, etc.)². The development of this sector will therefore increase competition for access to agricultural land, and it is within this paradigm that proactive Government policy setting and guidance on community engagement remain insufficient.

¹ December 2025, Australian Government, Geoscience Australia: [Australia's Identified Mineral Resources](#)

² November 2024, Australian Government, Australian Bureau of Agricultural and Resource Economics and Sciences: [Land Use of Australia 2010-11 to 2020-21](#)

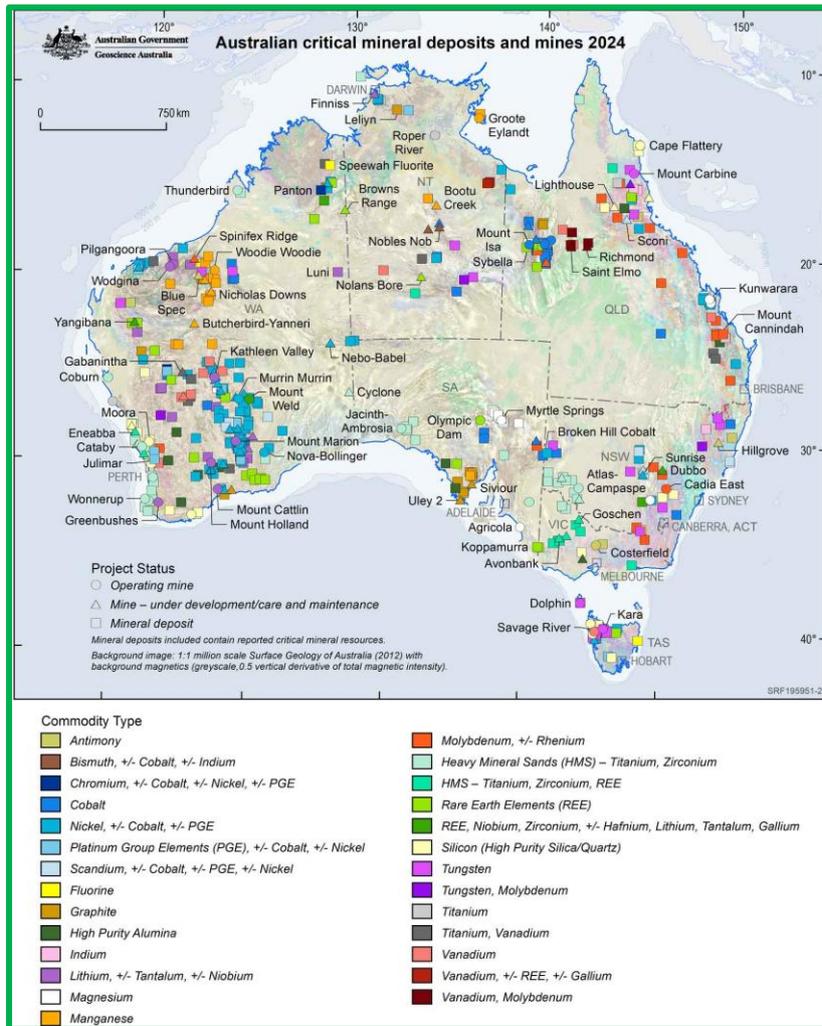


Figure 1: Distribution of Australian critical mineral deposits and mines 2024¹.

Economic Development and Uplifting Capability

The economic potential of Australia’s critical minerals sector is well established, with strong prospects for regional and national economic development. For instance, development can strengthen regional economies by creating new and additional avenues of employment, infrastructure investment, and the emergence of new high-value industries – outcomes that contribute to improved economic resilience and community wellbeing if managed properly with caution.

NFF supports responsible development of the critical minerals sector. Development must complement agriculture which remains a key contributor for local economies. With appropriate planning and coordination, critical minerals development and agricultural land-use can deliver mutually beneficial outcomes. There is strong potential for co-benefits to arise where projects are designed and implemented in real partnership. Farmers must be included in decision-making processes and recognised as key stakeholders in project planning rather than treated as an afterthought which appears to reflect at least the current thinking from Governments (an issue discussed further below).

Role of Governments in Supporting Socially and Economically Sustainable Development

NFF recognises that Australia's critical minerals sector is nascent, with many projects in early exploration or development phases and subject primarily to private negotiation between proponents and private landholders. At the same time, the scale of emerging opportunities is accelerating development across rural and regional Australia. Within this context, commensurate policy settings have not yet been established. In particular, best-practice guidance for community engagement remains lacking in both priority and detail, and there is no consistent or widely accepted model to guide engagement with agriculture or to assess the effectiveness of engagement practices.

NFF notes that State, Territory, and Commonwealth Governments have developed a range of strategies and frameworks (varying in detail) intended to support the growth of the sector. These include:

- **Australian Government (Commonwealth) (2023):** [Critical Minerals Strategy 2023-2030](#).
- **Northern Territory (2023):** [The Territory Critical Minerals Plan](#).
- **West Australia (2024):** [Western Australia's Battery and Critical Minerals Strategy 2024-2030](#).
- **Queensland (2023):** [Queensland Critical Minerals Strategy](#).
- **Victoria (2024):** [Victorian Critical Minerals Roadmap](#).
- **New South Wales (2024):** [NSW Critical Minerals and High-Tech Metals Strategy](#).
- **Tasmania (2024):** [Tasmanian Critical Minerals Strategy](#).

Across jurisdictions, there is a consistent emphasis on economic development, Environmental, Social, and Governance (ESG) objectives, and to a lesser extent engagement framed around First Nations participation and benefit-sharing. **By contrast, there is very limited to no recognition of agricultural landholders as key stakeholders or land managers for that matter, and little consideration of how land-use competition between mining and agriculture should be managed.** This is disconcerting and disappointing, and it shows not only a disregard for agriculture across jurisdictions, but a lack of understanding in farmers' stewardship of over 50% of the Australian landscape.

While land access for mineral exploration and mining activities is typically based on private negotiation, the absence of clear Government expectations and guidance does not demonstrate that achieving durable social licence is a priority in current Government thinking. NFF notes that the New South Wales and Victorian frameworks provide the strongest recognition of agricultural land-use and include commitments to support coexistence and improved land-use planning. However, these remain at early stages with limited detail or work undertaken thus far.

NFF's *Industry Engagement Guidelines for On-Farm Activities Policy* outlines a national code of conduct incorporating best-practice principles to guide respectful and constructive engagement between farmers and industries that require access to land. **These guidelines provide a practical framework for engagement and should serve as the model and benchmark moving forward.** Given the scale of opportunity and the rapid anticipated expansion of the sector, NFF considers that Governments should incorporate

clear expectations around community engagement into policy settings consistent with these principles.

Conclusion

Australia's critical minerals sector presents a significant opportunity for regional and national economic development. Achieving durable social licence will depend on recognising agricultural landholders as key stakeholders, establishing genuine partnerships with farming communities, and implementing clear and consistent engagement expectations across jurisdictions.

Please do not hesitate to contact Warwick Ragg, General Manager, Natural Resource Management, via e-mail: WRagg@nff.org.au at the first instance to progress this discussion.

Attachments List

- 1. NFF Prime Agricultural Land Policy**
- 2. NFF Land-Use Policy**
- 3. NFF Industry Engagement Guidelines for On-Farm Activities Policy**



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Prime Agricultural Land

Policy Position

The National Farmers' Federation (NFF) recognises the importance of prime agricultural land. The long-term success of the agricultural industry will be dependent on continued access to land and water resources and requires a long-term strategy centred on the productivity of our food and fibre systems. Prime agricultural land is a crucial consideration in this process.

Prime agricultural land is an invaluable, natural resource that provides the capacity for Australia to meet increasing global demand for food and fibre. It also provides significant environmental and social outcomes. The NFF recognises that prime agricultural land is complex because: land conditions are not static, it is influenced by both soil quality and proximity to water resources, access to infrastructure, and future technology and innovation. It cannot simply be defined by cadastral or other boundaries.

A prime agricultural land policy must not be prescriptive, but would provide a strategic pathway/set of principles for Governments to manoeuvre around inherent difficulties of land use conflicts and the need to produce food and fibre for a growing population. While protecting land is important, decisions made by individuals on the best use of their land must not be compromised and must not stifle future innovation. The NFF believes that a prime agricultural land policy should not be limited to 'protecting' land per se, but rather to provide a framework/set of principles to maintain or improve long-term land productivity that would safeguard Australia's capacity to produce food and fibre.

The NFF has separately prepared a set of guidelines — *industry engagement guidelines for on-farm activities* as an addendum to this policy, to facilitate best practices for industry to respectfully engage farmers for potential on-farm activities.

Issue

Increasingly, land used for farming in Australia is declining whilst demand for food and fibre is increasing globally. However, agriculture remains Australia's dominant land use. The area for agricultural holdings has declined almost 66 million hectares between 1992-93 and 2016-17. Sustainable intensification has become increasingly important to meet the global increase in food demand, and while this has partially offset the reduction in food production due to a loss of land, this alone will not offset the loss of broadacre food production. Securing productive

agricultural land remains imperative to maximise Australia's food production potential.

Productive land in high rainfall zones along the coastlines and around cities are now being lost to urban expansion. The development of mines and expansion of onshore gas activities can risk the productivity of agricultural land where there are potentially irreversible impacts on the integrity of soil and water resources. Continued urban expansion and, more recently, the development of solar and wind farms has raised concerns about further losses of prime agricultural land, particularly as many of these developments occur in agricultural areas.

The NFF recognises that land conditions change over time, particularly with climate change expected to increase the variability of weather and decrease rainfall in many parts of Australia. Some areas have already seen a shift in the type of agricultural production due to a changing climate. Additionally, some areas have become areas of high agricultural value due to infrastructure developments providing greater access to water, particularly in irrigation districts. Given this complexity, protecting prime agricultural land will be a complex task requiring adaptation through time.

This poses a significant challenge to agricultural communities that rely on agriculture for their economic viability. While the NFF acknowledges the diversification of income projects and other land uses provide to communities, non-agricultural on-farm development must be managed in a way so as to complement or coexist with agriculture, not stifle it. The NFF's 2030 Roadmap seeks to stem the loss of productive farmland to protect agricultural land and water assets, and prioritise global food and fibre needs. With the right policy settings, Australia is poised to become a \$100 billion industry by 2030 and double production by 2050.

Acknowledgement of these challenges, and recognition of the importance of agriculture, have led efforts from several state and territory governments to protect prime agricultural land. In South Australia, Environment Food and Production Areas (EFPA) were introduced to protect vital agricultural lands surrounding metropolitan Adelaide from urban encroachments. The Victorian Government is currently looking to protect the long term future of strategic agricultural land in Melbourne's green wedge and peri-urban areas. The New South Wales Government has developed an evidenced based methodology to identify 'important agricultural land' and developed maps to identify 'biophysical strategic agricultural land' for protection. Similarly, the Queensland Government has sought to identify 'Important agricultural areas' (IAAs) and an 'Agricultural land classification' (ALC) to guide planning decision making.

However, there is not yet an agreed national policy to manage prime agricultural land.

Background

The United Nations Food and Agriculture Organisation (FAO) predicts that, by 2050, the world's population will exceed 9 billion, and projects that food production (net of food used for biofuels) must increase by 70 per cent. Land for agricultural expansion is met with competition from:

- Resources industry;
- Conservation;

- Urban expansion;
- Renewable energy; and
- Carbon industry.

In 30 June 2017, approximately 51 per cent of Australia's landmass is now managed by farmers. Agriculture remains Australia's dominant land use, covering around 372 million hectares (ha). However area of agriculture holdings is declining, with a reduction of about 14 per cent (almost 66 million hectares) between 1992-93 and 2016-17. However, land use changes at the regional and local scale that have the potential to significantly affect the agriculture sector.

These changes can:

- displace agriculture entirely (for example from the expansion of urban and peri-urban residential areas or the conversion of use from farmland to conservation areas);
- reduce the net productivity from the land (for example from the expansion of rural lifestyle living in our coastal fringes);
- limit the range of farming practices that can be used (for example, neighbour pressures can limit the ability to intensify or use more efficient practices);
- put at risk the natural resources, such as water, on which agriculture production relies (for example through mining or onshore gas developments that interfere with groundwater); and
- put at risk our international reputation as producers of safe food (for example the risk of land and water contamination from the chemicals used in onshore gas activities).

Local, state and federal governments all have responsibilities and decision making powers that influence access to land for the agriculture sector. The responsibilities and powers are largely applied by either planning or environmental protection laws but the framing and delivery also need to involve the arm of governments involved in agriculture.

What the industry needs

The agricultural sector is seeking that all levels of government:

- recognise the important role that the agriculture sector plays — and will continue to play — in the economies of our local communities, our states and territories and our nation;
- develop a national agriculture strategy to guide Australia's vision for long-term and sustainable production of food and fibre;
- in acknowledgement of farmers local understanding, respect the right of an individual farmer to determine his/her own priority land use within existing planning requirements;
- strive for coexistence between land use practices where possible;
- recognise the importance of consulting local communities. They have a deep understanding of local issues, challenges and opportunities, especially for projects of significant scale;
- recognise that prime agricultural land is an irreplaceable resource that must be protected from permanent loss for agricultural use;

- invest in ongoing research efforts to improve land productivity and sustainable intensification;
- invest in resources that provide stronger scientific knowledge base to support regulators who make decisions on developments which have the potential to impact prime agricultural land;
- safeguard and invest in infrastructure to maximise the potential and sustainable intensification of agricultural land and enables greater control of supply chains, including water infrastructure;
- build a shared, public understanding of prime agricultural land and the role it plays in the production of food and fibre, and the broader environmental and social benefits it provides for farmers and the broader community; and
- provide certainty in the regulatory framework to support long-term investment for the sustainable development and management of prime agricultural land.

2019



Land Use Policy

Policy Position

The NFF promotes the protection of agricultural land. The long term success of the agriculture sector will be dependent on our continued access to land and water. Agricultural land is a valuable resource that all levels of government should preserve for the future prosperity of our sector and our nation.

The land use decisions of governments must:

- recognise agriculture as a pillar of our local, state, territory and national economies
- support growth in the agriculture sector enabling farmers to intensify, improve productivity, and change enterprises;
- ensure that any change in land use is compatible with agriculture by ensuring that water resources are protected, food safety and biosecurity are not compromised and that the ability of farmers to implement modern farming practices is not restricted;
- be based on up to date land use trend information and the best scientific knowledge;
- ensure that farmers have the right to genuinely influence decisions about the activities that happen on their land; and
- recognise the role sustainable and profitable agriculture can play in preserving Australia's biodiversity and managing our natural resources.

Issue

The future for Australian agriculture sector is exciting. The United Nations Food and Agriculture Organisation (FAO) predicts that by 2050 global population will exceed 9 billion (an increase of more than 2 billion from 2012), with an estimated 75% increase in demand for food. Much of the population growth, and growth in a more affluent middle class will occur on Australia's doorstep – in China, Indonesia and India. With the right policy settings, Australian agriculture is poised to double production by 2050. Our ability as a sector to reach this potential will be dependent on our ability to continue to access the land and water resources required to grow production. While agriculture remains Australia's dominant land use, the share of land used for agriculture is declining. At a local and regional scale, change in land use can have a

significant impact on the farm sector. Productive land in high rainfall zones along our coastlines and around our cities is now being used for urban and lifestyle living. As our neighbours change, our ability to adopt new technologies and practices is often curtailed by an idealised view of farming. The development mines and the expansion of onshore gas activities can risk the productivity of agricultural land where there are unacceptable impacts on the integrity of surrounding soil and water resources. The land use decisions of governments at all levels – local, state and federal – have the potential to affect the success of the agriculture sector.

Background

In 2005/06 approximately 59% of the Australian continent is used for some form of agriculture¹. Agriculture remains Australia's dominant land use, covering around 456 million hectares (ha). However the share of land for agriculture is declining, with a reduction of about 4 per cent (almost 19 million hectares) between 1992-93 and 2005-06. The availability of more recent data that tracks land use change at a regional, state and national scale is poor. However, we see land use changes at the regional and local scale that have the potential to significantly affect the agriculture sector.

These changes can:

- displace agriculture entirely (for example from the expansion of urban and peri-urban residential areas or the conversion of use from farmland to conservation areas)
- reduce the net productivity from the land (for example from the expansion of rural lifestyle living in our coastal fringes)
- limit the range of farming practices that can be used (for example, neighbour pressures can limit the ability to intensify or use more efficient practices)
- put at risk the natural resources, such as water, on which agriculture production relies (for example through mining or onshore gas developments that interfere with groundwater); and
- put at risk our international reputation as producers of safe food (for example the risk of land and water contamination from the chemicals used in onshore gas activities).

Local, state and federal governments all have responsibilities and decision making powers that influence access to land for the agriculture sector. The responsibilities and powers are largely enshrined in planning and environmental protection laws.

What the industry needs

The agriculture sector is seeking that all levels of government:

- recognise the important role that the agriculture sector plays – and will continue to play - in the economies of our local communities, our states and territories and our nation;
- ensure that food and fibre production is prioritised in land and resource planning decisions. We must reset the balance between agriculture and other land and resource uses, particularly where co-use and co-existence is achievable;

- commit to protecting agricultural land from unreasonable land use change and land use regulation. We need a more comprehensive and strategic approach to considering the value of agricultural land in land use planning, and development assessments and approvals; and
- strive for cohesive planning frameworks that support the growth of the agriculture sector
- further invest to improve the information and knowledge base on which land use planning and development decisions are made. We need access to more up to date data on the rate of land use change at a national scale, with a finer focus in those areas where the risks to agriculture are most acute. We need a stronger scientific knowledge base to support the regulators who make decisions on developments which have the potential to impact land and water resources. And where decisions are made to change land use or allow co-use, we need regulators to transparently monitor observed impacts and enforce the conditions that are put in place to protect agricultural land.

2017



Industry Engagement Guidelines for On-farm Activities

Context

The National Farmers' Federation has developed a national code of conduct incorporating principles to guide respectful and constructive engagement between farmers and industries that require access to land. It relates to activity on farmland including: renewables (solar and wind) development, cultural heritage studies and surveys, carbon industry, the resources industry as well as others that may emerge in the future.

The advent of mining and gas exploration, and more recently, solar and wind farms on agricultural land has often created significant land use conflicts in many regions around Australia, and stress for farmers and farming communities.

While we support industry investment in regional communities, we recognise that a collaborative approach that fosters a respectful and trusted relationship between industry and farmers is critical to ensure farmers rights are maintained, and are able to make informed decisions. These guidelines provide a general set of principles intended for the specific purpose of industry engagement with farmers.

It should also be noted that, a range of legislative and regulatory requirements exist for different types of activities and development, including:

- Development and planning laws;
- Environmental legislation (particularly for an activity that is likely to have a significant impact on matters of state or national environmental significance); and
- Water licencing and regulation.

Guidelines

General

- Parties should be aware of local, state and federal regulation and legislation regarding the activities and/or development prior to commencement of the activity. Where appropriate, the farmer should share information on specific requirements relating to agricultural activity on the land;

- The farmer should be aware of their rights and options. In advance of any discussions regarding access or development on the land, the farmer should have a copy of the industry guidelines (where applicable). Depending on the type, scale and risks involved with the activity, the farmer should seek legal advice to ensure they are appropriately protected;
- Industry should be aware that many farmers may have engaged with a variety of parties requesting access and use of their land. These past experiences will influence how a farmer views industry practices;
- Farmers have a right to reasonably expect that industry will comply with the guidelines at all times. Industry must also be able to demonstrate their compliance with industry guidelines and provide sufficient evidence upon request;
- Activity conducted on land used for farming requires a high level of cooperation and trust between the landholder and the activity proponent. This requires long term face-to-face engagement as well as on the ground staff and all subcontractors, where practical, to help facilitate effective communication. The farmer should have accessible channels of communication with appropriate personnel to engage in discussions, raise questions and resolve issues at every stage of the process. These processes should be agreed in writing by both parties prior to commencement of any construction work; and
- Industry must identify all relevant risks associated with the activities or development and inform the farmer, so far as reasonably possible, of these risks and discuss how they can be managed.

Land use agreements

- Land use agreements should recognise landholder and occupier property rights, and negotiations must be respectful of farmers' use and enjoyment of the land;
- Any agreements made in writing with the farmer should be expressed in a clear, accurate and transparent manner using plain English. A farmer is encouraged to have all agreements in writing, although it may not be legally required for some activities;
- Industry must recognise farmers' concerns associated with large scale projects such as impacts on amenity, changes to the microclimate, and potential loss of productive agricultural land. Proponents should work, as far as practicable, with the farmer to minimise these impacts and integrate development into the broader farm system;
- An agreement should establish the basis for which to achieve this and a process for rehabilitation or other compensatory measures. An agreement should provide a protocol for notifying the timing, duration and nature of the

activity, access routes, and means of liaising, rehabilitation or compensation of any damages;

- In the design and operation of the project or activity, care should be taken to avoid and/or minimise damage to agricultural land where feasible. These could include areas of high production agricultural land and biodiversity, water supplies, maintaining biosecurity etc. and should be agreed through consultation with the farmer and formalised in a written agreement before commencement;
- An agreement should be reached before the commencement of the activity or development regarding agreed outcomes for restoration of the site and any compensation that is determined to be necessary;
- Industry is strongly encouraged to adopt a 'benefit sharing' approach, beyond the landowner directly engaged, when engaging with small regional communities; and
- Responsible stewardship and management should be demonstrated throughout the life of the project. The agreement should detail how this will be achieved and compensatory measures if not.
- Industry must not compromise existing farm practices including: biosecurity, animal husbandry and timing of cropping. Activities undertaken on-farm should respect these operations and be reflected within the agreement.

Community engagement

- A social licence to operate is critical. Community engagement should be genuine, consistent, and based on mutual respect, and occur from the very beginning of a project. The process should seek to build an enduring relationship between the proponent and the community, maximise beneficial outcomes. Engagement and decision-making should be tailored around the needs and expectations of each community;
- Industry should proactively make available information to the broader community in a way that is accurate, accessible and timely throughout the life of the project in a way that reflects the needs and expectations of the particular community;
- Reasonable opportunities where the activity or development can enhance the value of the land in consultation with the farmer are encouraged; and
- Site restitution at the end of the project is critical. The proponent must engage with the farmer to responsibly decommission the site, including infrastructure and possibly recycling (i.e. product stewardship) and ensure that the land is returned to the way it was and or can be used for other agreed purposes.