



QUEENSLAND  
FARMERS'  
FEDERATION

# End of Waste Code Biochar

**Prepared by:**

---

**Name:** Jo Sheppard, CEO, QFF  
**E:** [qfarmers@qff.org.au](mailto:qfarmers@qff.org.au)

**Prepared for:**

---

Department of Environment and Science

**Date prepared:**

---

October 2023

The united voice of  
Queensland agriculture

## Contents page

About the Queensland Farmers' Federation.....	2
Submission .....	2
Background .....	2
Resource providers and users .....	3
Conditions of use .....	3

This submission is provided to:

Department of Environment and Science

Submitted via email [RRS.Consultation@des.qld.gov.au](mailto:RRS.Consultation@des.qld.gov.au)

## Our members

---

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Queensland Chicken Meat Council
- Pork Queensland
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Queensland Oyster Growers Association
- Lockyer Water Users Forum

# About the Queensland Farmers' Federation



## The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

We are a member-based organisation representing the interests of peak agriculture industry organisations, both state and national. Through our members QFF represents more than 13,000 primary producers across the cotton, sugarcane, horticulture, dairy, nursery and garden, poultry, eggs, pork, and intensive animal industries.

We unite the sector to engage in a broad range of economic, social, environmental, and regional issues through advocacy, policy development, and project activity. We work with the government of the day on behalf of industry, farmers, and the community to provide powerful representation and contribution to the policy direction, sustainability, and future growth of Queensland's agriculture sector.

Our Council of member representatives and policy committees set the strategic priorities for policy development and advocacy, while our Executive Board ensures our corporate governance.

QFF draws on the expertise and industry knowledge of our members and through our commitment to collaboration and considered policy development, we lead Queensland's agriculture sector towards a strong future, ensuring our members are ahead of the game and have a voice at the table on the issues that matter to their members.

## Submission

QFF welcomes the opportunity to provide comment on the draft End of Waste Code - Biochar.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

## Background

The End of Waste Code - Biochar draft outlines essential guidelines for the management and safe use of Biochar for both agricultural and residential users. Biochar is a valuable resource and its emerging use in a new era of regenerative farming can play a vital role in curbing greenhouse gas (GHG) emissions. The long-term carbon sequestration potential of Biochar also creates income diversification opportunities for farmers using the product for its carbon tradeable value in eligible Emissions Reduction Funds (ERF) projects. QFF also acknowledges its value in improving the fertility, water retention and organic carbon levels of agricultural soils.

Overall, QFF is supportive of the draft code however requests clarification or amendments to some listed conditions. These can be summarised as:

- QFF calls for clarification on how frequently registered resource producers will need to test for resource quality between batches.
- QFF questions why agricultural resource users must provide notification of intended use to the chief executive officer and users in 7.2 (b), who are situated closer to residential dwellings, do not.

- QFF calls for resource producers to provide quality criteria in line with synthetic fertiliser standards. Nutrient criteria should include general macronutrients, similar to end of waste (EOW) code ENEW07503118, as well as concentrations of inorganic N and C.
- QFF highlights the buffer distance for Biochar is 500m and does not allow for exclusions when neighbouring land holder consent is obtained. However, EOW codes with higher pathogen risk are limited to 100m buffer zones.
- QFF calls for shortened buffer zones for Biochar use on-farm or inclusion of a condition which allows for the removal of this buffer zone if neighbouring landholder approval is obtained.

## Resource providers and users

QFF acknowledges and supports the need for quality testing outlined in table 1 (condition 6.3). The accumulation of heavy metals or chemical contaminants (i.e. PFAS) can have long-term impacts on agricultural soil health, leading to increased acidity, reduced macronutrient concentrations and the loss of critical microbial and fungal communities<sup>1</sup>. Monitoring these qualities is vital to avoid adverse impacts to soil health, crop growth and yield.

As regenerative farming becomes more widely adopted, agricultural producers may choose to diversify on-farm income using Bio-gen facilities, and as such may become registered resource producers under the code. Given the varying types of waste produced on farm and the variation in composition among Biochar batches, QFF requests clarification on how frequently resource producers will be required to test batches for resource quality under condition 6.3 (table 1). QFF also requests clarification on whether resource producers will be required to amend safety datasheets batch to batch to account for varying base sources. Another important consideration for producers introducing Bio-gen facilities on site will be whether there is the potential for land where Biochar is produced to be classified as contaminated land, now or in the future. Further clarification is needed from the department on this point.

## Conditions of use

Section 7, Conditions of Use, excludes use of Biochar in residential areas for purposes such as landscaping and gardening, from legislated notification to the chief executive officer. Despite this, agricultural resource users are still required to provide notification of intended use 10 days prior. Further clarification is required as to why users closer to urban footprint areas and residential dwellings are excluded from this condition.

For use of Biochar as a fertiliser and/or soil conditioner, condition 6.8 requires resource producers to provide quality criteria to the user. QFF supports this condition however requests further information on the complete list of nutrient testing required. QFF also pushes for additional characteristics such as those listed in condition 6.5 of EOW code ENEW07503118, as well as inorganic N and C levels, to be included in this regulated testing. This will allow farmers to calculate more accurate agronomic loading rates, as well as application rates for other soil additives being applied simultaneously. Farmers should be able to purchase and apply Biochar to the same standard as any synthetic N fertiliser or combination fertiliser (N,P,K,S), and to do this the nutrient details provided must be in line with the same standards. This would shift the cost burden away from users (farmers) choosing to apply more carbon friendly soil additives by removing additional costs for analysis the farmer would have to request.

QFF highlights the buffer distance for Biochar is outlined as 500m in condition 7.9 and does not allow for exclusions when neighbouring land holder consent is obtained. However, EOW codes with higher pathogen risk such as ENEW07617019 (Biosolids), only hold a buffer distance of 50m between occupied dwellings and application, and 100m on a downslope. QFF questions the discrepancy between these two codes and advocates for the inclusion of a condition in the Biochar EOW code which allows for the removal of this buffer zone if neighbouring land holder approval is obtained.

Yours sincerely

Jo Sheppard  
Chief Executive Officer



**This submission is provided by the Queensland Farmers' Federation**

---

PO Box 12009 George Street, Brisbane Qld 4003  
Level 8, 183 North Quay, Brisbane Qld 4000  
ABN 44 055 764 488

**Contact QFF**

---

**E:** [qfarmers@qff.org.au](mailto:qfarmers@qff.org.au)  
**P:** 07 3837 4720  
**W:** [www.qff.org.au](http://www.qff.org.au)

