



AgForce Queensland Farmers Limited

ABN 57 611 736 700

Second Floor, 110 Mary Street, Brisbane, Qld, 4000
PO Box 13186, North Bank Plaza, cnr Ann & George Sts, Brisbane Qld 4003

Ph: (07) 3236 3100
Fax: (07) 3236 3077
Email: agforce@agforceqld.org.au
Web: www.agforceqld.org.au

Ref: MG/GL/GG23004

27 January 2023

The Assessor

RPI Act Development Assessment Division

Department of State Development, Infrastructure, Local Government & Planning

PO Box 15009

CITY EAST QLD 4002

By Email: RPIAct@dsdilgp.qld.gov.au

Dear Sir/Madam

AgForce is a peak organisation representing Queensland's cane, cattle, grain and sheep, wool & goat producers. The cane, beef, broadacre cropping and sheep, wool & goat industries in Queensland generated around \$10.4 billion in on-farm value of production in 2021-22. AgForce's purpose is to advance sustainable agribusiness and strives to ensure the long-term growth, viability, competitiveness and profitability of these industries. Over 6,500 farmers, individuals and businesses provide support to AgForce through membership. Our members own and manage around 55 million hectares, or a third of the state's land area. Queensland producers provide high-quality food and fibre to Australian and overseas consumers, contribute significantly to the social fabric of regional, rural and remote communities, as well as deliver stewardship of the state's natural environment.

In meeting the purpose outlined above, AgForce seeks to represent the interests of all members, through an inclusive committee process overseen by an elected board and governance structure under the Australian Charities and Not-for-profits Commission (ACNC). AgForce's Natural Resource Committee (NRC) is made up of members that represent the collected interests of landowners impacted by issues, which include those related with Coal Seam Gas (CSG) extraction such as subsidence. The NRC has advised the AgForce Board on many occasions on subsidence and has provided several submissions to open inquiries run by the Queensland Government and the Queensland Gas Fields Commission. The AgForce Board approved the Land Use Protection Principles developed by the NRC in response to numerous concerns members have been raising over recent years around identified coexistence challenges between agriculture and competing projects requiring access to agricultural lands (please see Appendix 1). These principles represent the common ground between members with a wide range of views around the beneficial and detrimental impacts of competing land uses.

With reference to subsidence, AgForce and the NRC have been involved in a range of forums through which AgForce members have queried the science underpinning subsidence modelling and monitoring, as well as the regulatory frameworks developed by the Queensland and Australian Governments to protect our natural assets. In particular, members have expressed grave alarms around the impacts of competing projects on irreplaceable prime agricultural land (PAL, variously described as PAA, SCA, SCL, Class A land, etc) used for dryland and irrigated agriculture, such as on the Darling Downs.

Continued/ ...

ADVANCING SUSTAINABLE AGRIBUSINESS

... /Continued

In recognition that many farmers throughout the Surat Basin and beyond have entered into Conduct and Compensation Agreements (CCAs) with CSG companies, with varying degrees of satisfaction, AgForce sees that risks of the material impacts of subsidence due to CSG activities and associated damage to PAL on the Darling Downs, irreplaceable rich soils on flat floodplains, need to be prevented through the application of the precautionary principle.

AgForce is lodging concerns with the Regional Interests Development Approval (RPI22/004): Kupunn Springvale Coal Seam Gas (CSG) Deviated Well Paths Regional Interests Development Approval. The grounds for our opposition to the RIDA application include:

1. The Office for Groundwater Impact Assessment (OGIA) has clearly identified that subsidence is occurring due to CSG activities (in addition to natural shrinking and swelling of soils).
2. OGIA has not completed its more detailed analysis of subsidence modelling and potential impacts.
3. The reports for the RIDA process have been commissioned and paid for by Arrow Energy, with no independent third party or 'external' assessments of agricultural impacts conducted (understanding that OGIA's remit is to assess impacts on underground water).
4. The GasFields Commission Queensland (GFCQ) has identified shortfalls in the regulatory framework relating to subsidence which should be addressed before further developments are approved.
5. The Arrow 12 coexistence commitments make no mention preventing or minimising impacts to farm hydrology or consequent changes to irrigation or productivity.
See: <https://www.arrowenergy.com.au/innovation/coexistence>
6. The AgForce Land Use Protection Principles are inclusive of the Precautionary Principle, which cautions against development which has the potential for causing harm when scientific knowledge on the matter is lacking.
7. Some AgForce members, who have extensive experience with the hydrology of the floodplain, understand that even minor deviations in slope have large systemic impacts on the operation of irrigated agriculture, which cannot be 'purchased' through compensation.

AgForce believes that under our Land Use Protection Principles, if CSG expansion is to occur, it should not be on PAL.

At a minimum, more extensive independent and verified research is required to understand the 'potential' impacts of subsidence before Queensland Government considers the Kupunn Springvale CSG RIDA.

AgForce seeks an extension of time for providing a larger submission.

If you have questions please contact myself or Dr Greg Leach on 0428 720 651 or by email: leachg@agforceqld.org.au.

Yours faithfully



Michael Guerin
Chief Executive Officer

Enc

Appendix 1: AgForce Land Use Protection Principles

As the body for agriculture, AgForce requires that alternative and potentially impacting land uses ensure:

1. There is recognition that natural capital has an inherent value
2. Human health and well-being must not be sacrificed
3. A precautionary approach that avoids negative legacy effects on natural resources including air, soil, water and biodiversity
4. There are no negative impacts on existing or future sustainable agricultural opportunities

Before:

- Recognize that resources are finite
- All projects are assessed on environmental, social and economic criteria
- There is a formal mechanism for agriculture to be involved in assessment
- Projects should not be assessed in isolation and cumulative impacts assessed
- Potential impacts need to be objectively, and accurately quantified rigorously and independently reviewed
- Agricultural landholders to have equal representation, available resources and bargaining power

During:

- All projects must have comprehensive monitoring and transparent reporting
- Non-compliance will trigger cease work
- Enforcement is primarily the responsibility of government, but landholders must have a right to compel action
- Industry and Government must proactively identify and manage cumulative impacts, both individual project cumulative impacts and multiple projects cumulative impacts

After:

- Land needs to be rehabilitated to be the pre-existing natural conditions
- Financial assurance needs to be adequate for rehabilitation

See: <https://www.agforceqld.org.au/knowledgebase/article/AGF-01250/>