



QUEENSLAND
FARMERS'
FEDERATION



Regional Planning Interests (Condamine Alluvium) and Other Legislation Amendment Bill 2026 **April 2026**

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This submission is provided to:

Queensland Parliament

Primary Industries and Resources Committee

Email: PIRC@parliament.qld.gov.au

Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- CANEGROWERS
- Greenlife Industry QLD
- eastAUSmilk
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- 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
- Lockyer Valley Water Users

About the Queensland Farmers' Federation



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

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide a submission on the Regional Planning Interests (Condamine Alluvium) and Other Legislation Amendment Bill 2026.

The Condamine Alluvium is one of Queensland's most important groundwater systems supporting some of Australia's most productive cropping land. Its ongoing viability is dependent on the integrity of its groundwater and surface water systems, as well as the condition of the highly fertile soils that have been farmed across generations.

QFF acknowledges the policy intent behind the proposed reforms which we understand seek to strengthen protections of the Condamine Alluvium and the valuable land that overlays this critical water source; however, the current drafting does not deliver on that intent in a way that protects this vital water source and the long-term agricultural productive capacity of the Condamine Alluvium. It is essential that any legislative reform preserves the Condamine Alluvium and the productivity of this region not only today, but ensures its agricultural systems, land and water resources remain viable for production beyond the life of CSG development.

Executive Summary and Recommendations

QFF supports elements of the Bill that strengthen the management of impacts associated with Coal Seam Gas (CSG) development and activities, particularly those that:

- Recognise subsidence as a compensable impact
- Clarify obligations associated with deviated drilling
- Strengthen pathways for landholder compensation.

However, in its current form, the Bill introduces a significant policy and regulatory gap through the proposed removal of the Regional Interests Development Approval (RIDA) framework under the *Regional Planning Interests Act 2014*.

RIDA is a critical, front-end mechanism that ensures impacts on agricultural production are properly considered before development occurs. Its removal significantly weakens the existing framework, reduces protections for the Condamine Alluvium, and leaves landholders with fewer rights when resource development is proposed.

As drafted, QFF cannot support the passage of the Bill and, in particular, cannot support the removal of the RIDA framework. Substantial amendment is required to ensure the long-term agricultural productive capacity of the Condamine Alluvium is protected and that landholders retain meaningful front-end protections.

QFF recommends:

- **The Committee support the retention of the Regional Interests Development Approval (RIDA) framework under the *Regional Planning Interests Act 2014* in its report to Parliament, as a core protection for agricultural production and regional prosperity.**
 - **The Committee recommend amendment to the Bill to retain all relevant provisions within the *Regional Planning Interests Act 2014*.**
- **The Committee support amendments to the Bill to explicitly recognise and regulate the risk of unintended gas migration into groundwater systems, ensuring this pathway of impact is captured within environmental approval conditions, monitoring and compliance frameworks under the *Environmental Protection Act 1994*.**
- **The Committee support and recommend the introduction of a formal referral mechanism to an independent Land Ombudsman for the assessment of disputes relating to impacts from resource activities, supported by the technical input from the Office of Groundwater Impact Assessment and the Department of Primary Industries.**
- **The Committee support the progression of reforms relating to subsidence and deviated wells, recognising their role in strengthening impact management and compensation pathways under the *Mineral and Energy Resources (Common Provisions) Act 2014*.**

RIDA as a Front-End Tool for Landholders

For the Committee, it is important to understand how the RIDA framework operates in practice.

For many landholders, RIDA is seen as a front-end assessment process that comes into play when CSG development reaches the farm gate. It is the point at which they can engage in a structured process to ensure the impacts on their farming operations, including water access, land condition and overall productivity are identified and properly considered before development proceeds. Importantly, RIDA is not optional. It is a legislated approval framework that compels resource companies to examine and account for these impacts as a condition of development.

Through this lens, the Committee can begin to understand why landholders place significant value on RIDA as a practical tool available to them when development is proposed in their immediate region. It provides a level of structure, transparency and leverage in discussions with resource proponents that would otherwise be absent, ensuring agricultural production is considered upfront rather than after impacts have occurred.

Why RIDA is Critical to Agricultural Production

Agricultural production in the Condamine Alluvium depends on:

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- Reliable access to groundwater and surface water
- The volume and availability of water for irrigation
- Interaction between connected water systems
- Soil condition and land integrity
- Cumulative impacts across the landscape.

It is also important for the Committee to understand that the RIDA framework and the Environmental Authority (EA) process serve distinctly different yet complementary functions within Queensland's regulatory system.

The EA process, administered under the *Environmental Protection Act 1994*, is focused on environmental management and compliance, including matters such as water quality and environmental harm. In contrast, the RIDA framework is specifically designed to assess and protect impacts on agricultural land and the productive capacity of Priority Agricultural Areas and places a priority on preventative measures to avoid impact.

These are not duplicative processes. Rather, they operate together to ensure both environmental values and agricultural production are appropriately considered. The removal of RIDA would leave a clear gap in the assessment of impacts to prime agricultural land that is not addressed through the EA process alone.

Unintended Gas Migration and Groundwater Protection

QFF also notes the importance of ensuring that all potential pathways of impact to groundwater systems are appropriately recognised within the regulatory framework. In particular, there are ongoing concerns regarding the risk of unintended gas migration associated with CSG development, sometimes referred to as fugitive contamination. This pathway of impact, involving the movement of hydrocarbons into groundwater systems, is not explicitly addressed within the current drafting of the Bill.

QFF considers that the Bill should be amended to ensure this risk is clearly recognised and appropriately regulated through environmental approval conditions, monitoring and compliance frameworks under the *Environmental Protection Act 1994*. Addressing this gap would strengthen the overall framework and provide greater confidence that groundwater resources are protected from all relevant risks.

Absence of Protections for Volumetric Water Entitlements

QFF notes that the bill does not address a critical gap relating to the protection of existing volumetric water entitlements in the Condamine Alluvium.

Agricultural production in the region relies not only on water quality, but on the availability and reliability of water volumes over time. Any reduction in accessible groundwater directly impacts the ability of landholders to maintain production.

Current regulatory settings operate on assumed or modelled volumes of water take associated with CSG activity, forecast by the Office of Groundwater Impact Assessment (QGIA) as a part of the Underground Water Impact Report (UWIR) process. While this modelling provides an important basis for understanding predicted impacts, it is inherently reliant on assumptions and

projections. As such, there remains a risk that actual water extraction and system response may exceed or diverge from these assumed volumes over time.

Under existing arrangements, the risk is primarily managed through make good provisions. While these arrangements play an important role, they are inherently reactive in nature and are not designed to protect the broader integrity of volumetric entitlements or the cumulative availability of water across the system.

Make good outcomes:

- Do not restore system-wide water availability
- Do not address cumulative impacts across multiple users
- Are limited in their ability to protect long-term agricultural production at scale.

This creates a clear gap in the framework.

There is currently no mechanism to ensure that existing volumetric water entitlements, which underpin agricultural production, are protected where actual water take from CSG activities exceeds initial assumptions.

In the absence of stronger protections, there is a risk that agricultural water users and the community reliant on this water, bear the consequences of underestimated extraction, with limited ability to prevent or mitigate these impacts upfront.

This risk reinforces the importance of maintaining strong front-end assessment mechanisms, such as the RIDA framework.

The Risk of Removing RIDA

The removal of the RIDA framework represents a shift in regulatory approach, from early assessment and impact avoidance to managing impacts after they occur.

For landholders, this removes a key legal tool that enables early structured engagement before development proceeds.

For the Condamine Alluvium, it introduces the risk that:

- Impacts on water availability are not fully understood
- Groundwater and surface water interactions are not adequately considered
- Cumulative impacts are not properly assessed
- Long-term agricultural productive capacity is reduced over time.

The Bill, as currently drafted, represents a departure from the established framework under the *Regional Planning Interests Act 2014*. This departure reduces the level of protection afforded to the Condamine Alluvium and diminishes the rights currently available to landholders.

QFF's position is that the Bill requires substantial amendment, primarily ensuring the retention of all relevant provisions within the Regional Planning Interests Act framework. Maintaining this structure is critical to ensuring that protections for agricultural land remain clear, consistent and enforceable.

This Bill proposes to remove the protections provided through the RIDA process, with the enhanced protections from the inclusion of the deemed water quality condition only applying to new wells approved under and EA after the Bill becomes law.

It is known that existing EA's are already in place for a significant proportion of the expected CSG gas well development over the Condamine Alluvium footprint. There are hundreds or more wells, that have an approved EA, but are not yet developed.

If this Bill is passed in its current form, the option for a landholder to ensure a Resource Company seeks a RIDA, will be removed immediately, and any enhanced protection to water quality would only apply if the resource company applies for new wells.

This would effectively mean that these hundreds of unconstructed, but EA approved wells, could be constructed without a RIDA and without water quality protection.

This is a retrospective action that will leave landholders with less rights than before the Bill and will leave the Condamine Alluvium exposed, without protection, in relation to these undeveloped wells.

This is a serious flaw in the proposed Bill and must be addressed.

Support for Targeted Reforms

QFF supports the reforms introduced in the Bill that strengthen the recognition and management of specific impacts.

In particular:

- Classification of deviated drilling as an advanced activity, ensuring appropriate engagement and agreement with landholders
- Recognition of subsidence as a compensable effect under the *Mineral and Energy Resources (Common Provisions) Act 2014*.

These measures improve clarity, strengthen compensation pathways, and provide greater certainty for landholders.

However, they operate at the point of impact management and do not replace the need for upfront assessment and protection.

Further Reform Opportunities under the Mineral and Energy Resources (Common Provisions) Act 2014

QFF supports and acknowledges that the Bill introduces important reforms through the *Mineral and Energy Resources (Common Provisions) Act 2014*, the Bill presents a further opportunity to strengthen dispute resolution pathways available to landholders.

Where disagreements arise regarding impacts to land, water or agricultural production, current pathways can be complex and unclear. There is merit in establishing a clearer referral mechanism to an independent body, such as a Land Ombudsman, supported by technical input from OGIA and the Department of Primary Industries.

The addition of this mechanism would improve transparency, provide consistency in decision-making, build enhanced confidence in the framework, and provide landowners with greater certainty when navigating complex disputes.

Importantly, these reforms are complementary to the framework, not a substitute for the front-end protections provided under the RIDA framework.

Maintaining a Balanced Framework

A robust framework for the Condamine Alluvium must include both:

- Front-end protections, to identify and avoid impacts to agricultural production
- Back-end mechanisms, to manage and compensate impacts where they cannot be prevented.

The Bill as drafted strengthens the latter, but removes a critical element of the former which will result in significantly less front end protections.

Conclusion

QFF supports the policy intent of the Bill which we understand seek to strengthen protections of the Condamine Alluvium and the valuable land that overlays this critical water source. QFF acknowledges the positive steps taken to strengthen compensation pathways and recognise key impacts such as subsidence and deviated drilling.

However, in its current form, the Bill creates a significant gap in the protection of agricultural production across the Condamine Alluvium by removing the RIDA framework.

A departure from the RIDA framework leaves landholders with fewer protections and reduces the safeguards currently in place to protect the Condamine Alluvium's long-term agricultural productivity.

Without the retention of the RIDA framework, QFF cannot support the passage of the Bill.

QFF therefore implores the Committee to reflect this position in its report to Parliament by:

- **Recognising the RIDA framework as a core protection for agricultural production and regional prosperity, through amendment of the Bill to retain the RIDA framework under the *Regional Planning Interests Act 2014*.**
- **Support the amendment of the Bill to recognise and regulate unintended gas migration as a pathway of impact to groundwater systems under the *Environmental Protection Act 1994*.**
- **Support the introduction of strengthened dispute resolution pathways, including referral to an independent Land Ombudsman.**
- **Progressing targeted reforms that improve the management and compensation of impacts associated with CSG development.**

Together, these measures will ensure the Bill delivers on its policy intent while maintaining the protections necessary to safeguard the long-term agricultural productive capacity of the

Condamine Alluvium, preserving the integrity of its soils and water resources, and supporting the ongoing stewardship of this land by future generations of farmers.



QFF welcomes the opportunity to appear before the Queensland Parliament Primary Industries and Resources Committee in their consideration of the Bill.

Yours sincerely

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