



QUEENSLAND FARMERS' FEDERATION

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Submission

8 July 2019

General Manager
Office of Groundwater Impact Assessment
Department of Natural Resources, Mines and Energy
PO Box 15216
CITY EAST QLD 4002

Via email: SuratUWIR@dnrme.qld.gov.au

Dear Sanjeev

Re: Submission on the Draft 2019 Surat Underground Water Impact Report (UWIR)

The Queensland Farmers' Federation (QFF) is the united voice of intensive, semi-intensive and irrigated agriculture in Queensland. It is a federation that represents the interests of peak state and national agriculture industry organisations, which in turn collectively represent more than 13,000 farmers across the state. QFF engages in a broad range of economic, social, environmental and regional issues of strategic importance to the productivity, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland farmers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland (NGIQ)
- Queensland Chicken Growers Association (QCGA)
- Queensland Dairyfarmers' Organisation (QDO)
- Australian Cane Farmers Association (ACFA)
- Flowers Australia
- Pork Queensland Inc.
- Queensland United Egg Producers (QUEP)
- Queensland Chicken Meat Council (QCMC)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd.

QFF welcomes the opportunity to provide comment on the Draft 2019 Surat Underground Water Impact Report (UWIR). We provide this submission without prejudice to any additional submission from our members or individual farmers.

The united voice of intensive agriculture



Background

QFF notes that this draft report constitutes the third Underground Water Impact Report (UWIR) since 2012, providing ongoing assessment and management of cumulative impacts from coal seam gas (CSG) development in the Surat and southern Bowen basins.

The report is underpinned by a redeveloped geological model, groundwater flow model and detailed scientific assessments using additional data that has become available since 2016.

QFF acknowledges that the existing and planned CSG production area has increased by 17 per cent since the 2016 UWIR. A total of about 21,000 CSG wells are now projected. This is around two-third of the wells proposed when the projects were approved.

Feedback

QFF notes that the predicted impacts on the Hutton Sandstone and the Condamine Alluvium, are now less than those predicted in the 2016 report. However, this reduction is due to actual data being used in the 2019 report, as opposed to the modelled data (that was conservative in nature) used in the 2016 report. As such, this predicted decrease is not due to any decrease of impacts from the gas industry and their activities per se; and highlights the criticality of actual data in understanding impacts. QFF supports the strengthening of the monitoring network from the current network of around 600 monitoring points to 629 groundwater level and 115 water chemistry monitoring points – noting that even further monitoring is essential.

QFF is concerned about the greater impacts predicted in the Walloon Coal Measures and the Springbok Sandstone. Predicted impacts are different from 2016 due to changes in the industry's planned development, improvements in modelling and new knowledge about aquifer connectivity.

While a total of 574 water bores are predicted to be impacted in the long term – an increase of about 10 per cent compared to 2016 predictions – approximately 80 per cent of those bores are in the CSG target formations and the remainder are in the surrounding aquifers. And within the next three years, 101 water bores are predicted to be impacted, for which responsible tenure holders are identified for follow-up make good arrangements. QFF continues to be concerned around the discrepancy in the number of impacted bores versus the number of make good agreements.

IESC Advice to the Commonwealth, February 2019

QFF notes that early this year, the Independent Expert Scientific Committee on Coal Seam Gas and Large Coal Mining Development (the IESC) provided advice to the Commonwealth Government on the QGC Pty Ltd's Surat North CSG Project¹.

QGC Pty Ltd proposes to add 740 wells to the existing 400 wells at its Surat North CSG field. The proposed project lies in the Surat Cumulative Management Area (CMA) in Queensland, approximately 35 km south-west of Taroom. The project area is in the upper Dawson Catchment, a sub-catchment of the Fitzroy River drainage basin, which flows into the Great Barrier Reef lagoon. There are also two mining leases that overlap parts of the project area: one a subsidiary of Glencore for open cut coal mining east of the project area and the other by Taroom Coal for open cut coal mining in the centre of the project area.

The IESC identified risk to declines in shallow groundwater level due to depressurisation of underlying aquifers and Walloon Coal Measures; and reductions in water availability to springs, riparian ecosystems, fringing vegetation of a wetland of High Ecological Significance (HES), several Regional

¹ IESC (2019). Advice to decision maker on coal seam gas project. IESC 2018-100 Surat North CSG Project (EPBC 2018/8276) – Expansion. February 2019.

Ecosystems listed as 'Of Concern' (Queensland) and other groundwater-dependent ecosystems (GDEs) as a result of groundwater depressurisation and drawdown.

The IESC also highlighted the criticality of actual bore data and existing production data from the life of the project as an opportunity to improve both the regional and local groundwater models. A range of potential impacts and limitations in modelling provided by the proponents were identified. QFF seeks clarification on whether this project has been included into the modelled impacts outlined in the 2019 UWIR, and look forward to discussing the project, its risks and the management of its impacts to ground and surface waters in more detail with OGIA.

Research

Queensland's unconventional gas sector and its development is becoming the focus of increased research with regards to governance systems to manage the sectors impact on water and food. One study² acknowledged a range of views of OGIA and its ground water model. Generally, respondents spoke favourably of OGIA, as an independent statutory authority funded through an industry tax; the importance for OGIA to be 'disconnected' from government as essential in building trust; and there are limitations and errors in the modelling.

QFF maintains that managing nexus issues requires good data and information about both potential direct and cumulative impacts and collaborative governance approaches must be explicitly knowledge generating. It is essential that OGIA is sufficiently resourced to fund increased monitoring and understanding of actual and future impacts.

QFF recognises the criticality of acknowledging the water-energy nexus concerns around CSG's impacts on food, water, and energy, and points out that the Queensland Government is yet to demonstrate any practical successes at implementing meaningful nexus-minded policy and governance.

If you have any queries about this submission, please do not hesitate to contact Dr Georgina Davis at georgina@qff.org.au

Yours sincerely

Travis Tobin
Chief Executive Officer

² Holley, C., Kennedy, A. (2019). Governing the Energy-Water-Food Nexus: Regulating Unconventional Gas Development in Queensland, Australia. JURIMETRICS. Volume 59. Issue No. 2. (Winter 2019).