



QUEENSLAND
FARMERS'
FEDERATION

6 June 2023

Mr Warwick Squire
Chief Executive Officer
Gasfields Commission Queensland
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Via email: warwick.squire@gfcq.org.au

Dear Warwick

Re: Potential Consequences of CSG-induced Subsidence Report

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland. It is a federation that represents the interests of 20 peak state and national agriculture industry organisations and 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)
- EastAUSmilk (formerly QDO)
- Australian Cane Farmers Association (ACFA)
- Turf Queensland
- Queensland United Egg Producers (QUEP)
- Queensland Chicken Meat Council (QCMC)
- Pork Queensland Inc
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Fairbairn Irrigation Network Ltd
- Mallowa Irrigation Ltd
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd
- Eton Irrigation Co-operative Ltd
- Lockyer Water Users Forum (LWUF)
- Queensland Oyster Growers Association (QOGA)

QFF welcomes the opportunity to provide comment on the Potential Consequences of CSG-induced Subsidence Report. We provide this submission without prejudice to any additional submission from our members or individual farmers.

MEMBERS
Canegrowers
Cotton Australia
Growcom
Nursery and Garden Industry Qld

eastAUSmilk
Turf Queensland
Australian Cane Farmers Association
Queensland United Egg Producers

Queensland Chicken Meat Council
Pork Queensland Inc
Qld Oyster Growers Association
Irrigator Groups Across Qld

Coal seam gas (CSG) development across the Condamine floodplain falls within Priority Agricultural Area (PAA) land and is causing concern for a number of landholders due to potential future subsidence risks that could impact individual farms and the regional landscape more broadly. This particular area of land is high value, intensively farmed priority agricultural land which is made up of rich alluvial clay soils and is rightly regarded as some of the most productive agricultural land in Queensland.

It is important that farming enterprises are protected by a framework that provides a clear pathway for impact assessment, determination and dispute resolution for all landholders who may become materially impacted by CSG-induced subsidence. The existing framework is fragmented, confusing and does not adequately protect the landholder from future risks.

Many landholders are concerned that CSG-induced subsidence may have damaging and negative future impacts on farming practices, productive capacity, and land values. This will likely incur high costs of remediation, placing additional short- and long-term pressures on landholders, and their farming enterprises.

In response to these concerns the GasFields Commission Queensland (GFCQ) has undertaken both a review of the regulatory framework to identify potential regulatory enhancements and an assessment of the potential consequence of CSG-induced subsidence on farming enterprises. QFF has been pleased to see the GFCQ undertake both these important pieces of work.

QFF makes the following comments on the draft Potential consequences of CSG-induced subsidence for farming operations in priority agricultural areas in the Condamine report:

- QFF supports the regional predictive modelling being carried out by OGIA be extended to identify areas where farming operations are at higher risk of being disrupted by subsidence.
- QFF supports the reports conclusion “because each farm is different in detail, farms that are at risk will need to be assessed individually addressing the range of considerations noted in this report”. QFF endorses the principle that all farms are different and as such, impacts may vary between farms and subsequently require different approaches in addressing, minimising or preventing impacts.
- It is imperative that agriculture has an equal seat at the coexistence table, and that we work together with a long-term view within an evidence-based decision-making framework, while acknowledging that not all impacts can be compensated for. QFF submits that if “critical” damage to the landscape is identified through modelling then the option for prevention must be able to be exercised.
- QFF notes Cotton Australia’s concerns that the report infers that as normal practice, fields are re-graded (lazed) more often than they are with reference made to bankless channel systems. QFF notes Cotton Australia’s reference that most irrigation in this region is conducted using furrow-based gravity systems, not bankless channel systems.

Stronger landholder protections must include decision making that is based on scientific evidence and the driving principle of avoiding impact. QFF has been supportive of the Commission in taking on this important piece of work as it will assist stakeholders in better understanding the potential consequences of CSG-induced subsidence.

QFF is supportive of work being continued as per the recommendations including assessing potential CSG induced subsidence for landscape scale impacts.

QFF submits that the frustration and concerns of many farmers in seeing this important work being done at a stage when CSG development has already commenced should be acknowledged, that there are a wide range of views and perspectives regarding these issues, and that it is important that individual farmers are able to articulate and have their views heard.

Yours Sincerely

Jo Sheppard
Chief Executive Officer