

7 October 2016

Research Director

Agriculture and Environment Committee

Parliament House

BRISBANE QLD 4000

[aec@parliament.qld.gov.au](mailto:aec@parliament.qld.gov.au)

Dear Sir

**RE: Environmental Protection (Underground Water Management) and Other Legislation  
Amendment Bill 2016**

I appreciate having the opportunity to submit my response to the proposed bill  
(*Environmental Protection (Underground Water Management) and Other Legislation  
Amendment Bill 2016*).

As an environmental professional who has worked for government and the resources industry over the past 18 years, I support having a strong regulatory framework to ensure sustainable development of Queensland's natural resources. In addition to this I fully understand the potential impacts that resource development projects may have on groundwater resources if rigorous processes are not followed.

I do however also have very serious concerns about some of the implications of the planned legislation, some of which may be 'unintended consequences'. In particular, I can see no material environmental benefit in making a company such as my employer, which is quite advanced in the project approval pathway, effectively participate in a repeat of the recent reporting, public submission and Land Court processes in the name of 'underground water management'. Repeating this process does little or nothing to add to the scientific rigour and public scrutiny, which has already been achieved through the lengthy EIS process.

What this legislation probably will achieve in it's current form, is to greatly increase the sovereign risk for a those remaining companies that are willing to invest in Queensland. I would also note that by effectively discouraging coal miners from operating in Queensland, this will likely encourage companies to open up or expand alternative mines in countries such as Indonesia and Mongolia.

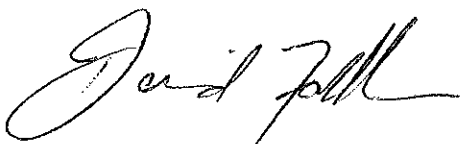
Apart from the loss of Australian (Queensland) jobs, this also means that poorer quality coal will likely be mined, in settings where environmental and social regulations and other safeguards, are significantly inferior to those currently existing in Queensland. The net outcome is therefore likely to be jobs being transferred from Queensland to other (foreign) mining states, and more environmental harm being caused (both locally where the mines operate, and also globally through the combustion of inferior quality (dirty) coal).

Queensland water resources face threats from a range of 'landuse activities', including but certainly not limited to traditional agricultural practices (eg: land clearing, cotton farming), urban development, defence operations (eg: fire fighting activities) and extractive industries. I doubt that the proposed legislation will manage the risks posed by all of these landuse activities in a way which is either equitable or proportional to the respective risk of environmental harm.

I would also like to remind the committee of the socio-economic consequences of increasing the sovereign risk for mining companies. The mining industry has traditionally provided a substantial number of full-time and well paid jobs (obviously increasing the government's tax base and reducing the burden on the social security system). By effectively forcing workers to re-skill and/or change industries, a large proportion will be forced into unemployment or underemployment. There is a multiplier which means that this loss of 'wealth creation' flows through the community, through less money being spent on real estate and a range of other retail transactions. In short – nobody wins when the state economy shrinks.

In light of the points I have raised above, I would encourage the committee to support a redrafting of the bill currently being proposed.

Regards



David Follington  
M.Sc. (Env.Science)

