



## LOCK THE GATE ALLIANCE LTD

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Dear sir,

Lock The Gate Alliance (LTGA) appreciates the opportunity to comment on this inquiry into the regulatory burden on the agriculture and resource industries.

LTGA represents more than 150 community groups and thousands of individual supporters concerned about the impacts of mining and unconventional gas developments on Australia's land, water and other environmental resources, cultural heritage values and the health of residents in nearby communities.

LTGA's mission is to protect Australia's natural, environmental, cultural and agricultural resources from inappropriate mining; and to educate and empower all Australians to demand sustainable solutions to food and energy production.

- The Alliance is committed in all its activities to the following **principles**:
- That robust scientific assessment, the precautionary principle and the principle of intergenerational equity should guide decision-making.
- That communities should have the ultimate say, within the context of Principle 1
- That it will support all and any communities who support the objectives of the Alliance.

Through its organisation and campaigning against inappropriate mining, the Alliance has five central **aims**:

- To protect Australia's water systems.
- To protect Australia's agricultural land for food and fibre production.

- To protect Australia's bushlands, wetlands and wildlife.
- To protect the health of all Australians.
- To protect Australia's aboriginal and cultural heritage.

In working to achieve these aims the Alliance has two central **policy objectives**:

To ensure the governments of Australia :

- Introduce a moratorium on unconventional gas exploration and mining until the community is satisfied through a sufficiently robust and independent assessment that these industries will not have a detrimental impact on Australia's water systems, agricultural land, community health, natural environment Aboriginal and cultural heritage; and
- Allow only responsible and sustainable mining which provides for the protection of where we live, the health and resilience of the community and the preservation of where we grow food and fibre, the natural environment, and Aboriginal and cultural heritage.

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LTGA believes that the health of the economy and the people of Queensland is dependent on the health of the environment. There is abundant evidence from around the world indicating that damaged and unhealthy environments lead to chronic health conditions requiring expensive medical intervention. LTGA further believes that unwinding important environmental protections will eventually come at a significant cost to the Queensland economy.

A significant percentage of LTGA's membership are rural landholders and primary producers. Significant investments have been made to ensure that their businesses and property management practices comply with legislation and regulation that have been introduced in Queensland over the past 10-15 years. There is considerable resentment from this group that the resources sector is afforded special treatment and is not required to comply with the same standards.

LTGA is concerned that the resources sector is driving the need for reform of licensing and regulatory frameworks on the grounds that compliance and administrative costs are too high. LTGA contends that there is an urgent need to strengthen environmental protection and maintain environmental standards to protect the natural resource assets on which life and economic development depends. In our opinion, environmental goods and services are not appropriately valued in any cost-benefit analyses but regarded by policy and decision-makers as essentially free. Yet industries such as agriculture and tourism would be in dire straits without them. The economic analysis behind licensing regulation must highlight the importance and economic value of ecosystem services and not allow environmental

protections to be watered down.

For this reason, LTGA advocates that any measures taken to reduce costs must be consistent with the intent, purpose and objectives of the *Environment Protection Act 1994* (i.e. to improve the total quality of life, both now and in the future by maintaining the ecological processes on which life depends).

LTGA believes that the Queensland community puts great importance on natural assets such as the Great Barrier Reef, our National Parks and other protected areas, our land and water resources and expects them to be protected and managed for the long term benefit of all Queenslanders. Weakening regulations to streamline approval processes and reduce compliance measures is contrary to community expectations. What the community increasingly expects is transparent decision-making, robust governance and equitable treatment for all sectors to ensure an appropriate balance between the state's economy and protection of its environment. There is a tangible perception, especially among LTGA's rural industry stakeholders, that the government is distinctly biased towards the resource sector and that development at any cost is considered acceptable. For an increasing number of people, this is far from the case.

LTGA would welcome publication of studies into the costs of licensing, regulation and compliance. Primary producers have to comply with a raft of requirements and have adapted their businesses to accommodate them. Given the environmental and social costs of resource developments and their impacts on the economics of rural enterprises, we see no reason why the resources sector should not also adapt – and pay their share.

LTGA members spend many hours reading, researching and responding to EISs that companies have no doubt spent tens or hundreds of thousands of dollars developing. If a proponent cancels a project for any reason, a new project and new EIS may be produced by another party, requiring more input from community members.

To avoid this waste of time and money, LTGA advocates for explicit “no go” areas to permanently protect water resources, good quality agricultural lands, significant ecosystems, community health and culturally important areas.

For all other areas, clear and enforceable standards must be set to ensure eg no net loss of native vegetation cover, water quality standards, appropriate discharge limits and effluent disposal practices, groundwater recharge areas, buffer zones for water courses and human settlements and protection of floodplain process including historical flood flow paths.

LTGA notes the current rush to amend many pieces of Queensland legislation. We support amendments that are fair, equitable and apply to all sectors of the economy and community; which are based on the precautionary principle, sound science and which will be limited by a cumulative impact threshold. The differing requirements and processes applied to the CSG industry under the Petroleum and Gas Act 2004 vs those of other water users under the Water Act 2000 provide a case in point.

We will not support amendments that reduce environmental protection or increase the risks of harm to members of the Queensland community.

Similarly, LTGA is concerned by the impending reduction in public service staff numbers and the ability of government agencies to ensure compliance with and enforcement of the imposed conditions. With the plethora of resource industry projects in Queensland LTGA estimates there must be well over a hundred current Environmental Authorities and potentially thousands of conditions to be monitored. Community confidence that this is adequate is being eroded in the rush to wind back current legislative and regulatory requirements – and by the cessation of funding to the Environmental Defenders Office.

Thank you for the opportunity to comment.

Yours sincerely,

A handwritten signature in cursive script that reads "Drew Hutton".

Drew Hutton,  
President.