9/07/2014,
Goomboorian Community Action,
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The Research Director
Agriculture, Resources and Environment Committee
Parliament House
George Street
BRISBANE QLD 4000
By email to: AREC@parliament.qld.gov.au

Dear Sir/Madam,

Mineral and Energy Resources (Common Provisions) Bill 2014

I am sending in this submission on behalf of the members of the Goomboorian Community Action Group who are very concerned about the proposed changes to the processes surrounding the granting of mining leases in Queensland. Members of this group are especially concerned because like a great number of Queenslanders they live in an area where a significant area of the district is subject to coal exploration permits. Since much of this area has historically been and is currently an intensive agricultural area, these changes indicate a real intent by the State Government to favour mining interests over agricultural ones.

Thank you for the opportunity to make a submission to the Committee.

In general, it is a concern that the main intent of these changes which is stated many times throughout the document outlining the recommendations, is to save the mining industry money spent on applications and associated costs and time which is also translated into monetary terms. The issues of environmental and other concerns of the people, in many case farmers, who also conduct their industries on the land have been given little importance. The government obviously means to encourage mining industries which make money for multinational companies in the short term, leaving it unusable for agriculture instead of encouraging long term sustainable agriculture which provides the basic necessities for living in an ecologically friendly way.

We, therefore, oppose the changes proposed in the following sections of the document called, 'Mining Lease Notification and Objection Initiative Discussion Paper including Regulatory Assessment'.

- It is unacceptable that these proposed changes were originally tabled under the guise of "*Small Scale Alluvial Red Tape Reduction discussion paper*."(p1 and p23)
- These changes are solely to benefit the mining industry, not Australians. "*By reducing statutory requirements and associated delays and costs at the resource application stage the Government is removing obstacles that will enable industry to better leverage market opportunities."(p v)*
- One of the objectives is to "*minimise the opportunity for resource sterilisation, that is, the resource is not able to be mined." (p vi)* This would seem to mean allowing the mining of a resource where for some reason it is not wise to do so.
- "*Limiting the right to object to a ML application to landholders and local government" (p vii)* removes the right of those affected by environmental issues, most importantly depletion and contamination of ground water and contamination of above ground water, especially by heavy metals in rain water, to object. Agricultural regions die without water suitable for animals and irrigation. We all share the underground water and the air which can so easily be made unusable by activities on a nearby property so removing the right to object is a serious infringement of community rights. Anyone who has lived on a rural property, is especially mindful of the reliance human beings have on the environment and each other and how easily damage by one person can affect all around.
- *"Limiting the right to object to individual mining EA applications under the EP Act to site-specific applications.* "(p vii) does not take into account that each area is different and may have different water resources or wind directions and strengths etc. which will mean that the proposed mine would have individual reasons for objections. The people who have lived on these lands for many years often have much better long term knowledge of conditions and should be able to make their objections known.

- *"Reducing the assessment times for the granting of MLs by" "no longer excluding restricted land from the area covered by the grant of the ML."(p vii)* This is unacceptable presuming that this status of restricted activity on the land was placed for a reason and the body responsible for granting the mining approval should not be able to override it. We liken this on a smaller scale to changing the protected status of The Great Barrier Reef.
- *"Broad public notification of an application* {low risk mine} *under the MRA will also no longer be required. (p viii)* Again this is an attempt to keep the community uninformed about what is going on in the neighbourhood. Just because an application has been made should not mean that it will automatically be approved and therefore the community cannot know it has been granted unless they are notified
- *"For all ML applications the landholders and local government will be notified directly to ensure issues relevant to the tenure application (including compensation, land access and infrastructure) can be considered during the application process and an objection lodged if required."(p viii) W*e believe most objections raised would be of environmental concerns affecting the living conditions of the residents in the vicinity so why is environment not included in this list? Is this an indication of the little importance the government places on the environment which sustains us all?
- *"objection rights under the MRA will clarify which issues can be objected to under the respective jurisdictions"(*p ix) Any country person recognises that each property is different so why is there to be a prescribed list of things which can be objected to? We do not believe it is possible to cover every scenario in such a list.
- *"It is not reasonable for individual miners to carry the burden of philosophical debate on whether mining is an appropriate land use through their ML application."* (p34) Why not? Why is it more important to destroy some of the most valuable farmland in the world, as in the black soils at Cecil Plains and the rich red volcanic soils in coastal areas, to protect mining interests than to protect the very land that feeds us?. Surely objections based on these situations in these areas, against individual mines would have to be valid. Proposed mines in important city water catchment areas would also come into this category.
- *"Providing for greater flexibility in resolving restricted land by eliminating the 'hole' in the lease area will reduce red tape, regulatory burden, cost and time delays without compromising the purpose of the restricted land."(p10)* This appears to be a total contradiction of terms. How can restricted land not be compromised if a restricted activity is allowed on it? And continuing in that paragraph *"If the resource is sterilised then investment and job opportunities may be lost."* It would seem the government again is placing no importance whatsoever on the agricultural industry, lost to the area with the job losses and infrastructure losses which inevitably will occur. Let us not forget agriculture is sustainable whereas mining will come, take what they want and leave a destroyed environment.
- *"As objections could no longer be made against the EA" (p28)* there would be a significant savings in Land Court costs. This assumes that the Land Court has no valid use but I am sure it does and objections heard through it should not be watered down. Making things easier for mines simply makes it more difficult for Australians to lead a productive life in a clean environment and to object if they see that being taken away from them by multinational corporations.
- *'As most mines are in remote environments" (p27)* Whoever wrote this has not looked at a map of mining exploration approvals and mining leases for some time. We are from the southeast corner and the threat is creeping down the coast and of course has already impinged on the Darling Downs and headed for the Toowoomba Region. *"That skills base can be critical to the sustainability of these communities and retention of youth within them." (p28)* Whoever wrote this has not heard of the evacuation of Acland just west of Toowoomba or FIFO mines where workers leave their jobs in the small towns to work in mines which offer inflated wages.
- We have left the best till last. *"It has been estimated the total cost to industry to having to return to the land to post a notice on a ML alone is $413 100 a year or approximately $4 131 on average per application." (p15)* It was suggested that because the notices were subject to deterioration by weather, they would have to be replaced regularly. We believe any intelligent person could protect the notice so that it was waterproof and attached securely so it could not blow away. It was also suggested that these signs were in remote places, so would not be seen by the general public, anyway. The information in the previous dot point clearly shows that more and more mines are being approved for increasingly populated areas. Removal of the regulation that requires these signs benefits only the mining companies and does not fit well with keeping the community informed.

So we **oppose the changes as listed in the dot points above.**

We call on the Committee to approach the proposed legislation with a view to empower, rather than disempower, our communities to take responsibility for our State. In Queensland for decades any person or group has been entitled to object to any mining proposal in open court, to have the evidence scrutinised about the benefits and detriments of a proposed mine. We

request that you do not accept these changes but instead keep existing provisions that require public notification of all proposed

mining projects and that allow any person or incorporated group to object to all mining leases and environmental authorities on all the existing grounds.

Yours sincerely,

Shelley Gage for Goomboorian Community Action Group

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