

Mineral and Energy Resources and Other Legislation Amendment Bill 2024

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To The Committee Secretary

Submission to the Mineral and Energy Resources and Other Legislation Amendment Bill 2024

The University of Queensland Gas and Energy Transition Research Centre (UQGET – previously The University of Queensland Centre for Natural Gas) welcomes the introduction of the proposed Mineral and Energy Resources and Other Legislation Amendment Bill 2024 (MEROLA 2024). This submission focuses on the proposed provisions to enhance the State's coexistence framework and provide a framework for managing the impacts of coal seam gas (CSG) induced.

The evolution of regulatory frameworks to address issues that emerge as industries establish and mature; and community expectations of regulatory processes and protections grow, is essential to support social licence and maintain trust in government institutions. We congratulate the Queensland Government on more than a decade's commitment to the development of a regulatory framework to support coexistence between landholders, regional communities and the onshore gas industry. The expansion of these initiatives to encompass the whole of the resource sector and the growing renewable energy sector is appropriate recognition of the importance that all parties will play in the future economic and energy security of Queensland. A framework for managing the impacts of CSG-induced subsidence complements the State's progress in managing the groundwater impacts of CSG extraction.

Subsidence management framework

The Centre has previously provided the Department of Resources with a summary of the current scientific knowledge regarding subsidence processes in the Surat Cumulative Management Area¹, based on approximately seven years of scientific research in this field. We note that the proposed MEROLA 2024 provisions are well-aligned with the recommendations in the December submission, which aimed to:

- Reinforce the importance of science-led provisions,
- Ensure that the provisions reflected the likelihood of potential impact and did not create undue concern for landholders in areas where risk and impact are unlikely to manifest,
- Ensure transparency of process and landholder access to data, and
- Decrease the burden of information gathering for landholders.

The Centre is pleased to see the provisions have focused on a scientific, risk-based assessment of impact and predictions of impact rather than setting prescriptive distance-based boundaries that could lead to unnecessary landholder concern and workloads.

¹ Co-existence Institutions and CSG-induced Subsidence Management Framework - Submission (UQ Centre for Natural Gas, 12 December 2023)

The adoption of a risk-based categorisation system to prioritise data collection and farm assessment activities is strongly supported, and the inclusion of independent auditing of farm field assessments is welcome. The Centre does however acknowledge concerns raised by other submitters regarding the need for multiple professions to contribute to the assessment itself, and for the time and resources that landholders will need to contribute to the assessment process. Submitters, such as AgForce are better qualified to represent these issues, but similar landholder concerns regarding the time and money impost of existing landholder agreement provisions are well known. Any amelioration of these impacts would be well-received by the landholders concerned.

Coexistence Queensland

The Centre strongly supports the expansion of the GasFields Commission Queensland (GFCQ) scope to include the resources sector and renewable energy sector. Media coverage of community responses to proposals for new mines, wind and solar farms, transmission lines, hydro-power and hydrogen hub developments demonstrate that there are significant landholder and community concerns regarding the pace and scale of development at the local level. GFCQ's experience to date provides an excellent foundation for this broader role.

The Centre also supports the GFCQ request that the following functions under the *Gasfields Commission Act 2013 (GFC Act)* be retained and broadened in scope:

- S(1)(c) - reviewing the effectiveness of government entities in implementation of regulatory frameworks; and
- S(1)(3) - making recommendations to the relevant Minister that regulatory frameworks and legislation relating to the onshore gas industry be reviewed or amended

GFCQ, and in the future Coexistence Queensland (CQ), is uniquely placed to engage with stakeholders who experience the impact of the interplay between a large body of government regulation relating to the energy sector, regional development, agricultural productivity and community resilience. GFCQ has demonstrated the ability to positively influence change in a number of portfolios relevant to onshore gas sector, and this capability should be harnessed to identify and respond to emerging issues across the resources and renewable energy sectors.

Resourcing Implications

The scope of responsibility proposed for Coexistence Queensland and the expanded role for OGIA will require a corresponding commitment of resourcing to effectively deliver the intent of the legislation. The proposed legislation is seeking to address issues that are technically complex and can generate significant individual and community concerns. Enacting this legislation may create a higher level of public expectation regarding potential outcomes. It is essential that both organisations are appropriately resourced to carry out their functions to a high standard.

Future MEROLA Guidelines

The proposed legislation provides for the development of guidelines in relation to land monitoring, baseline data collection and farm field assessments. The Centre would welcome the opportunity to contribute to the development of future guidelines in these areas.

Summary

The matters addressed in the MEROLA Bill are complex and there are few, if any, precedents that Queensland can look to emulate. This Bill demonstrates the Queensland Government's ongoing leadership in dealing in a balanced fashion with competing interests and its willingness to adapt legislation and institutions to meet the ongoing needs of all stakeholders and in the best interests of all Queenslanders. There may be elements of this Bill that in the future will need adaptation, I am confident that the government of the day will continue to take departmental and other expert advice to adapt as necessary at that time.

Yours sincerely,



Professor David Close

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