

Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025

Submission No: 018
Submission By: Central Downs Irrigators Ltd (CDIL)
Publication: Making the submission and your name public



CENTRAL DOWNS IRRIGATORS LIMITED

17th December 2025

Health, Environment and Innovation Committee
Parliament House
George Street
Brisbane Qld 4000
Via email: HEIC@parliament.qld.gov.au

Submission: Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025

Dear Health, Environment and Innovation Committee,

Introduction

Central Downs Irrigators Ltd (CDIL) is a special interest community group representing the interests of irrigation members on the Central Darling Downs. Our members stretch across the Condamine Floodplain and hold water interests in the Central Condamine Alluvium; the Condamine River; the North Branch of the Condamine River; while heavily supported by Overland Flow as an invaluable water source in this region.

Our members contribute significantly to employment and economic activity in this agriculturally rich region, supporting local towns and communities over numerous generations.

CDIL values strong protections of environmental values and agricultural assets, including those pertaining to our state's invaluable water sources for the benefit of the environment, domestic water supplies, and agricultural use; as well as those to be impacted by CSG-induced subsidence.

As a vested interest stakeholder impacted by resource activities occurring in our region, we welcome the opportunity to provide feedback on the Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025 (**The Bill**), in particular those reforms pertaining to Chapter 3 and 3A of the *Water Act 2000*.

CDIL is, in the main, supportive of the proposed reforms to the *Water Act 2000*, which have the aim to improve environmental outcomes and importantly improve landholder protections, along with greater public transparency and accountability.

Reporting on Make Good Measure Outcomes

Reporting on Make Good Measure outcomes is well overdue, not only for the purposes of public transparency, but also to better aid oversight and regulation by the administering authorities. We fully support this proposal.

Baseline Assessment Plans

As do we fully support the move to bring Baseline Assessment Plans for the Surat Cumulative Management Area (CMA) into the Underground Water Impact Report (UWIR), which have so far only been included in off-tenure situations. This has created a critical knowledge gap for stakeholders in on-tenure areas, where they have been unable to access fundamental details about the required timing and status on baseline assessments in relation to their own water bores and those of their region. The only way Baseline Assessment Plans have been able to be accessed until now is via Right to Information at an unjust cost and significant time delay to affected parties. This is an affront on the availability of critical information to landholders, leaving them in the dark when it comes to rights and obligations imposed on the resource tenure holders in relation to their own water assets. CDIL is glad to see this failing in due process finally being rectified.

That said, the public cannot be expected to wait for the next UWIR iteration for this to be made available. A transitional provision must be enacted to ensure this information is made available in the most prompt possible timeframes.

Extension of the UWIR Cycle

Despite the general agreement with the proposed reforms to the Water Act, we are however **strongly opposed** to the proposal to change the UWIR cycle from the present 3 years to 5 years.

Proposal not included in prior consultation process by DETSI

This proposal has not been cited or mentioned at all during the prior consultation process dating back to 10th June 2025 when the Department of Environment, Tourism, Science and Innovation (DETSI) released the consultation paper: [‘Realising efficiencies and streamlining in the Environmental Protection Act 1994 and other portfolio amendments’](#), nor during further targeted consultation on the draft exposure Bill between 24th September 2025 until 17 October 2025.

The [DETSI Written Briefing](#) to the Health, Environment and Innovation Committee states:

“This amendment acknowledges that greater flexibility is needed to reduce administrative burden while maintaining effective oversight of groundwater impacts.”¹

We do not agree with this statement. Three years is more than adequate time for well-resourced resource companies (in situations outside of the Surat CMA) and the Office of Groundwater Impact Assessment (in situations inside the Surat CMA) to prepare and publish Underground Water Impact Reports. Extending this out to 5 years does not improve effective oversight of groundwater impacts, in fact, it represents a decided weakening of oversight due to the reduced frequency of monitoring and modelling information, and management obligations, being made available to the relevant administrative agencies within government, and to affected stakeholders and the general public.

As mentioned, this was not included in the prior consultation. It has come completely out of leftfield, meaning that stakeholders have been denied the ability to have their say and effect appropriate research into the ramifications of this proposal. We now have a very short timeframe under the Parliamentary Committee process to carry out this background research to put our case forward. It would appear that this suggestion has come from possibly just one submitter from the resources industry during the prior consultation process, which is not a balanced and effective

¹ DETSI Written Briefing to the Health, Environment and Innovation Committee (**DETSI Written Briefing**) – p11

manner in which to propose legislative reform that will have significant ramifications on so many affected stakeholders:

*“Industry submitters sought to ensure timetables for the plans are not prescriptive so that it did not constrain the ability to update or reschedule production plans. **An additional suggestion was for UWIRs to be prepared on a five-yearly cycle rather than the proposed three-yearly cycle.**”²*

Ability to extend the UWIR already exists (section 370 of the Water Act)

There is already an existing ability for resource tenure holders and the Office of Groundwater Impact Assessment (OGIA) to request an extension beyond the 3 years if necessitated, under section 370 of the Water Act, subject to approval by the Chief Executive. This has indeed occurred with the latest iteration of the UWIR in 2025, following the last iteration in 2021, making it a 4 year cycle, due to new monitoring and research related to the Condamine Alluvium and the major Horrane Fault zone, which OGIA wanted extra time to work on so that some of the findings could be included in the UWIR 2025. This extra research demonstrates significant connectivity concerns between the Condamine Alluvium and the target Walloon Coal Measures, especially in regard to Arrow Energy’s tenure over the Condamine Alluvial Floodplain and its Priority Agricultural Areas.

A UWIR for a CMA is a statutory report that provides:

- *an assessment of cumulative impacts from existing and proposed groundwater extraction by resource tenure holders (i.e. associated water)*
- *proactive strategies for managing those impacts i.e. make good of water bores, monitoring strategy and impact mitigation strategies for affected springs*
- *assignment of responsibilities to individual tenure holders to implement strategies.*

*The relevant resource activities are depressurisation from coal seam gas (CSG), dewatering by coal mines and production of conventional oil and gas.*³

As explained in the Consultation Draft of the UWIR 2025, the UWIR is prepared to update the assessment and management strategies in response to emerging data, information and issues following the principle of adaptive management. Once approved, implementation of the management strategies in the report become a statutory obligation on the relevant tenure holders. Iterative assessments also provide a basis for ongoing review of environmental authorities (explored further below):

² DETSI Written Briefing – p24

³ A Summary of Underground Water Impact Report 2021 for the Surat Cumulative Management Area https://www.rdmw.qld.gov.au/data/assets/pdf_file/0008/1584719/uwir-2021-summary.pdf - p5/20

1.3 Who has prepared the report?

The UWIR for the Surat CMA is prepared independently by the Office of Groundwater Impact Assessment (OGIA) **every three years** to iteratively update the assessment and management strategies in response to emerging data, information and issues (Figure 1-1) following the principle of adaptive management. The UWIR is finalised following consideration of submissions from stakeholders in relation to a consultation draft. Once approved by the regulator, which is the Department of Environment, Tourism Science and Innovation (DETSI), implementation of the management strategies in the report becomes a statutory obligation on the relevant tenure holders. Further updates on any changes in circumstances that would materially affect



Figure 1-1: The UWIR cycle

¹ Italics denote statutory/legislative terms; bold denotes emphasis.

the UWIR are provided through an annual review. In addition, iterative assessments also provide a basis for ongoing review of environmental authorities (EA), if needed.

4

The purpose of UWIRs is further expanded on in the [DETSI Guideline: Underground water impact reports and final reports \(ESR/2016/2000\)](#):

⁴ Consultation Draft of the Underground Water Impact Report for the Surat Cumulative Management Area (Draft UWIR 2025) – p18-19/248

2.1 What are underground water impact reports and final reports?

An UWIR is prepared to describe, make predictions about and manage the impacts of underground water extraction by resource tenure holders. An UWIR establishes responsibilities for resource tenure holders and ensures measures and programs are in place to respond to impacts on underground water. UWIRs will:

- identify aquifers that are predicted to be impacted by resource tenure holders' exercising their underground water rights (immediately affected areas (IAA) and long-term affected areas (LTAA));
- establish obligations to monitor impacts on aquifers and springs;
- impose a strategy to mitigate impacts on any spring of interest;
- assist with management of impacts of the exercise of water rights by resource tenure holders; and
- establish underground water obligations (make good obligations of the resource tenure holder for private water bores).

5

A UWIR must contain the following information, as outlined in the [DETSI Guideline: Underground water impact reports and final reports \(ESR/2016/2000\)](#):

An UWIR must contain the information that has been outlined in each of the following parts of this guideline:

- Part A: Information about underground water extractions resulting from the exercise of underground water rights
- Part B: Information about aquifers affected, or likely to be affected
- Part C: Maps showing the area of the affected aquifer(s) where underground water levels are expected to decline
- Part D: An assessment of the impacts to the environmental values from the exercise of underground water rights
- Part E: A water monitoring strategy
- Part F: A spring impact management strategy
- Part G: For a CMA, assignment of responsibilities to resource tenure holders.

6

As seen above, the UWIR is a statutory report which not only delineates existing cumulative impacts and makes impact predictions from hydrogeological modelling (including immediately and long-term affected areas of aquifers & water bores, and those relating to CSG-induced subsidence), but also assigns obligations to resource tenure holders e.g. bore assessments, make good measures, water monitoring etc. Being a statutory report, the UWIR is best placed to present this data. To have this

⁵ DETSI Guideline: Underground water impact reports and final reports (ESR/2016/2000) https://www.detsi.qld.gov.au/policies?a=272936:policy_registry/rs-gl-uwir-final-report.pdf (DETSI UWIR Guideline) - p2/30

⁶ DETSI UWIR Guideline – p9/30

stretched out to 5 years would signify a decided weakening of the present information provision, review and management measures afforded to the public as well as to the relevant administrative agencies; as well as resulting in a significant reduction in transparency and accountability.

As CSG expands across the Condamine Alluvium and the associated connectivity risks that ensue, as well as the impacts and predictions surrounding CSG-induced subsidence to which this Priority Agricultural Area (PAA) is particularly vulnerable, it is imperative that stakeholders and the general public - especially potentially affected landholders and bore owners - are kept up to date of modelling, monitoring, predictions and research data in a timely manner. A 5 year cycle would prevent such critical information provision in a timely manner, during a critical period of great concern amongst agricultural stakeholders when it comes to the ongoing integrity of the Condamine Alluvium and subsidence impacts to its PAA. For agricultural stakeholders and regional communities, who rely on this critical water source and the ongoing agricultural production from this region, to have any confidence in the review and management processes facilitated by the UWIR process, this must remain at the current 3 year cycle.

The importance of the UWIR process and its timeliness is outlined in the words of the General Manager of OGIA, Sanjeev Pandey, in this media statement relating to the release of the Consultation Draft of the UWIR 2025:

“This report delivers vital information for industry, landholders and government so that they can make informed decisions about groundwater management in the Surat, and support coexistence,”
he said.

“CSG and coal mining target formations are layered within some important aquifers of the Great Artesian Basin (GAB) – the Precipice Sandstone and the Hutton Sandstone – and also underlie the Condamine Alluvium, so it’s critical to periodically assess impacts of activities and keep a close eye on the effects on our natural resources,” Mr Pandey said.⁷

This includes the ability for all stakeholders to be able to make informed decisions about existing and predicted impacts caused by resource industry activities, but also so that such impacts can be monitored, managed and mitigated in an adequate time frame. A 5 year cycle does not enable these essential required outcomes.

Critical inter-linkage between the UWIR Process and the EP Act allowing for an ongoing adaptive management impact assessment process

What is more, and a critical aspect of the UWIR (being a statutory report), is that it enables an iterative adaptive management process in conjunction with the *Environmental Protection Act 1994* (EP Act).

For example, where resource proponents submit information in environmental approval applications, it is expected that there will be inherent uncertainties in predictions of environmental impacts relating to the exercise of underground water rights.

⁷ <https://www.dlgwv.qld.gov.au/about-us/news-media/news-listings/2025/report-details-the-cumulative-impact-of-csg-and-mining-activities-in-the-surat>

Therefore, under the Qld Government's preferred adaptive management approach, the UWIR is relied upon to provide ongoing and continuous information in regard to impacts derived from the modelling and monitoring provided by OGIA.

The complimentary impact assessment process between the UWIR and the EP Act is better explained here:

2.3 Adaptive management of impacts to groundwater: relationship with *Environmental Protection Act 1994*

Potential impacts on groundwater will be managed through an adaptive management regime through both the *Environmental Protection Act 1994* (EP Act) and the UWIR process in Chapter 3 of the Water Act.

The requirements of section 126A and 227AA of the EP Act are complimentary with the information requirements for an UWIR in section 376 of the Water Act. Section 126A outlines a list of information requirements which must accompany a site-specific environmental authority application where the resource activity or project involves the exercise of underground water rights. Section 227AA requires that this information also be included with an environmental authority amendment application where the proposed amendment involves a change in the exercise of underground water rights. These requirements ensure an upfront assessment of the impacts to environmental values from the exercise of these underground water rights has been undertaken, and that potential impacts are appropriately managed.

It is anticipated that the information supplied with the environmental authority application will be utilised and built upon for the responsible entity's submission of the UWIR. Equally, any relevant information contained in an approved UWIR may be utilised as part of the environmental authority application.

An environmental authority may be amended in response to the contents of an UWIR. This framework ensures that there is sufficient monitoring, collection and review of information for ongoing adaptive management of groundwater impacts due to the resource sector's statutory right to take underground water.

And further here:

Recommended methods and inclusions for Part D are described below:

An UWIR is required to include a description of past and predicted impacts on environmental values which result from the exercise of underground water rights. Relevant information submitted under the EP Act requirements can be utilised to address this requirement of an UWIR. In particular, this information builds upon information submitted as part of environmental authority application requirements under section 126A(2)(d) of the EP Act.

It is acknowledged that there will be uncertainties inherent in predictions of environmental impacts relating to the exercise of underground water rights which are submitted as part of an environmental authority application. This requirement therefore ensures the ongoing scrutiny of such impacts during the operational phase of resource projects. Any changes in impacts, or predicted impacts, identified in the UWIRs may trigger an amendment of the environmental authority to ensure the appropriate management of the impacts.

9

If the UWIR cycle is stretched out to 5 years, then this inter-linked (adaptive management) impact assessment process will be decidedly less effective and severely compromised thanks to the drawn-out provision of critical information arising from the reduced frequency of the disclosure of the modelling and monitoring data etc in order for regulators to make informed decisions and to be able to provide adequate compliance, enforcement and oversight.

Gassy Bores not captured by the UWIR process

The following is not captured in scope of the proposed legislative reform under the Bill, however CDIL feels it is important to mention so that it may be considered by the Parliamentary Committee.

CDIL is concerned that the UWIR process is only capturing those water bores identified as long-term affected (LAA) by a decline in water level and not any water bores that may be impaired by free gas or contamination only, that do not exhibit a decline in water levels. This phenomenon has been very apparent during CSG development in the Surat Basin and triggered the commissioning of a report by the CSG Compliance Unit (CSGCU) of the Department of Natural Resources and Mines to evaluate as such: [Potential effects of free gas on bore water supply from CSG development](#).

“Methane gas presenting at water supply bores is a common problem faced in many sedimentary basins in the USA, Canada and more recently in the Surat Basin where the basins are exploited for CSG (or coalbed methane), tight gas or conventional gas.”¹⁰

“The majority of bore complaints received by CSGCU involve issues relating to free gas in water bores and the impacts the free gas had been having on the capacity of water bore to supply water. Some ambiguity has also emerged in terms of the extent to which the make-good arrangements in the legislation deals with the free gas issues. To address this, the CSGCU has commissioned KCB to

⁹ DETSI UWIR Guideline – p14/30

¹⁰ Potential effects of free gas on bore water supply from CSG development, Klohn Crippen Berger (commissioned by CSG Compliance Unit Department of Natural Resources and Mines), March 2016, <https://notatanycost.com.au/wp-content/uploads/2014/02/KCB-Gassy-Bore-Final-Report.pdf> (Gassy Bore Report) – p3/29

compile a brief scientific background report about the potential effects that free gas can have on a bore's capacity to supply water in the context of CSG development in the Surat Basin."¹¹

The cause of free gas migration is explained as follows:

"Once free gas is formed, it is available to migrate. Groundwater (containing some dissolved gases) flows from high pressure to lower pressure, but free gas flow is driven by two factors: pressure difference (or pressure gradient); and buoyancy force.

Pressure gradient drives gas from high pressure to low pressure if a continuous free gas path is available. At the same time buoyancy force allows free gas to rise upward through the formation because gas is lighter than groundwater. Buoyancy force will lift the gas to surface unless the upward movement of gas is stopped by physical barrier of low permeability geological formations.

Pathways are the route or conduit through which free gas moves from one part of the aquifer to another, or to the surface and water bores. Natural pathways for free gas migration include vertical and sub-vertical fractures, geological faults and high vertical permeability units. Anthropogenic pathways include wells, water bores and exploration holes."¹²

Water bores are particularly vulnerable to this free gas phenomenon caused by CSG depressurisation:

"Because of the buoyancy, gas bubbles can escape along bedding planes away from the gas filed in an up-dip direction where pressure gradient is low or negligible. Conceptually free gas can also migrate to water bores that are situated at large distances up-dip of the producing CSG well in formations above the CSG target formations. Gas migration to water bores can occur through existing wells, water bores and exploration holes that are improperly constructed or maintained (bores with compromised integrity) or through water bores that access water from the formations to which gas has migrated to. A number of investigations in USA and Canada have established bores and wells as pathways for gas migration to water bores, and to the ground surface."¹³

Free gas in water bores can occur where a decline in water level is not observed, instead in some situations a rise in water level is actually experienced due to the volume of the gas present in the water:

*In most instances CSG-induced free gas in water bores is likely to correspond to areas where decline in water levels from CSG development has occurred or likely to occur. Conceptually there are instances where free gas in water bores may occur despite there being no decline in water level in that bore. This may be in the CSG target formations as well as in overlying formations around the CSG development areas which may or may not be affected by water level decline. This may also be along the margins of the CSG development areas in up-dip direction. A number of cases of water level rises in bores are recorded in the Surat Basin which correspond to intermittent release of free gas from the bores.*¹⁴

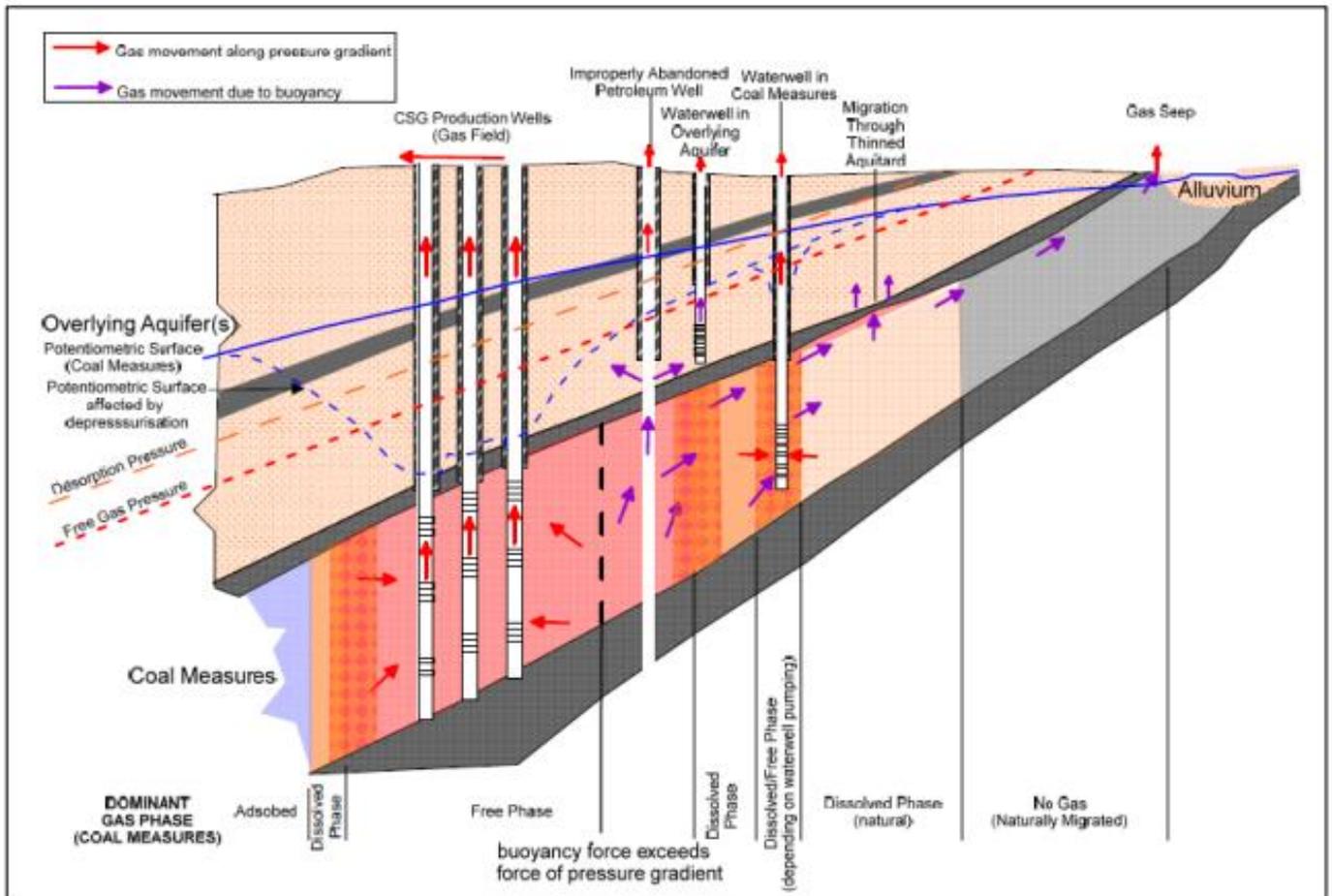
¹¹ Gassy Bore Report – p8/29

¹² Gassy Bore Report – p4/29

¹³ Gassy Bore Report – p4/29

¹⁴ Gassy Bore Report – p4/29

This diagram helps demonstrate the process and how overlying aquifers, like the Condamine Alluvium, are susceptible to this process. As stated in the report, stray or fugitive free gas can migrate under the force of buoyancy in an up-dip direction up to 10-15km from the depressurised area (CSG production wells):



15

The report concluded that “free gas from CSG development can occur in water bores that do not experience a water level decline from CSG development”.

The report also substantiates the significant issues to water supply and quality that free gas in water bores poses:

¹⁵ Gassy Bore Report – p13/29

5.3 Impacts on Water Bores

Presence of free gas in a water bore is more than just nuisance. It directly affects the bore's capacity to provide water supply for the intended purpose unless, where possible, remedial actions are taken. A bores' capacity to supply water can be affected in the following ways:

- Free gas hampers **pumping operations and damage pumps** and infrastructure potentially resulting in costly operations and replacements. Damages to electrical submersible pumps occur through gas locks, cavitation and overheating. Pumps may have to be replaced with different types, such as the positive cavity pumps (PCPs) or may require modifications to operate satisfactorily. Remedial options may not always be feasible.
- Free gas in the formation around a water bore provides a resistance to flow of water to the bore and reduces the formation's effective permeability to water. This in turn results in a **decline in a bore's designed capacity** or yield (i.e. the amount of water that the bore is capable of providing in a given period of time).
- **Quality of water** in a bore is also affected by the presence of gas. It causes sediments to accumulate at the bottom of water bores to move through the water column. In certain circumstances, it can lead to the production of some toxins.
- Free gas contains methane, carbon dioxide and nitrogen which are all odourless gases. Methane can burn, can be explosive and must be vented to the outside because it poses a **safety hazard**. Safety issues pose difficulties in running and maintenance of bore.

16

The presence of free gas in water bores can lead to long-term impairment and ultimate decommissioning (under the Make Good Framework) as has been seen in the Surat Basin:

"A number of water bores up-dip of Orana fields have reported water level rise. These are flagged for decommissioning by Origin Energy as they are deemed unsuitable for water supply (pers. comm CSGCU)."¹⁷

Such bores are not being captured under the UWIR LAA Bore reporting process. Therefore, there could be a lot more than the 747 long-term impaired bores, presently reported in the draft UWIR 2025, represented by free gas or contamination impairment alone.

DETSI needs to look at ways in which these impaired bores can also be reported through the UWIR process (including those affected historically).

This is particularly pertinent in relation to the rolling adaptive management risk assessment process commandeered through the inter-linkage between the iterative UWIR process and impact assessment for the purpose of environmental protections under the EP Act framework, including assessment of Environmental Authorities (EAs) and amendments to EAs, as mentioned above.

This data needs to be made available in the UWIRs under Chapter 3 of the Water Act to allow for a functional and systemic application of the above ongoing risk assessment process in order for appropriate management, mitigation and preventative measures to be put in place for the

¹⁶ Gassy Bore Report – p26/29

¹⁷ Gassy Bore Report – p16/29

protection of Queensland's environmental values, in this instance one of our most valued assets - groundwater.

Impacts to environmental values not being assessed as part of the UWIR process

Likewise, the following is also not captured in scope of the proposed legislative reform under the Bill, however CDIL feels it is important to mention so that it may be considered by the Parliamentary Committee.

CDIL is extremely concerned that a number of significant impacts caused by underground water extraction by resource tenure holders (*the exercising of underground water rights*) are not being assessed as part of the statutory UWIR process.

This includes:

1. **Water Quality**
2. **Gas Migration** in terms of impacts to water quality and water supply (as discussed above)¹⁸
3. The risk of **Microbial Activity**¹⁹ being introduced into the Condamine Alluvium and the associated potential microbial influenced corrosion (MIC) impacts on both gas and water bore infrastructure
4. **Overland Flow assessment** from CSG-induced subsidence and its impacts on riverine catchments (e.g. ecological water requirements for GDEs) and agricultural water supply

CDIL is of the opinion that these impacts fall within the category of impacts to environmental values, as defined in Section 9 of the Environmental Protection Act 1994, and should be accordingly factored into the ongoing UWIR assessment process.

An environmental value is defined in section 9 of the EP Act to be:

- a) a quality or physical characteristic of the environment that is conducive to ecological health or public amenity or safety; or
- b) another quality of the environment identified and declared to be an environmental value under an environmental protection policy or regulation.

Under the Environmental Protection (Water) Policy 2009 (Water EPP), all Queensland waters including groundwater have prescribed environmental values and water quality objectives. For some waterway basins and areas, environmental values and water quality objectives are listed in Schedule 1 of the Water EPP. Where this is not the case, default environmental values are prescribed under section 6(2) of the policy. These include:

- aquatic ecosystem health for:
 - o high ecological value waters;

¹⁸ Potential effects of free gas on bore water supply from CSG development, Klohn Crippen Berger (commissioned by CSG Compliance Unit Department of Natural Resources and Mines), March 2016

¹⁹ <https://gisera.csiro.au/research/surface-and-groundwater/understanding-controls-and-constraints-of-potentialmicrobially-influenced-corrosion-in-onshore-gas-wells/>

- o slightly disturbed waters;
- o moderately disturbed waters;
- o highly disturbed waters;
- uses which include:
 - o aquaculture and human consumption of aquatic foods;
 - o agricultural uses (e.g. stock watering and irrigation)
 - o recreational uses (e.g. swimming, wading, boating, fishing and aesthetic)
 - o drinking water (raw water supply)
 - o industrial uses (e.g. power generation and manufacturing, mining and minerals refining/processing)
 - o cultural and spiritual values (aesthetic, historical, scientific, social or other significance of the waters to the present, past, or future generations).²⁰

The above impacts to environmental values not currently being assessed as part of the statutory UWIR process signifies a contravention of sections 376(da) and (db) of the *Water Act 2000*:

5.1.4 Part D: Impacts on environmental values

Requirements under sections 376(da) and (db) of the Water Act

To meet the requirements of the Water Act, an UWIR must include the following:

1. a description of the impacts on environmental values that have occurred, or are likely to occur, because of any previous exercise of underground water rights (section 376(da) of the Water Act);
2. an assessment of the likely impacts on environmental values that will occur, or are likely to occur, because of the exercise of underground water rights (section 376(db) of the Water Act)—
 - i. for a three year period starting on the consultation day for the report; and
 - ii. over the projected life of the resource tenure.

21

This is a critical facet of the ongoing impact assessment to environmental values under the EP Act and without such assessment under the UWIR signifies a breakdown in the ongoing scrutiny, oversight and management of impacts to environmental values during the operational phase of resource projects under the Queensland Government's adaptive management framework, as evidenced above.

CDIL requests a review of the above gap in impact assessment to ensure the ongoing protection of environmental values, especially connected to the future integrity of the Condamine Alluvium and

²⁰ ESR/2016/2000 – p14-15/30

²¹ ESR/2016/2000 – p14/30

its overlying Priority Agricultural Area across the Condamine Floodplain.

We thank the Parliamentary Committee for their attention to the matters raised in this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N. Clapham', with a stylized flourish at the end.

Nic Clapham
Chairman
Central Downs Irrigators Ltd.