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Submission No. 021  
17 January 2014  
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The Research Director  
State Development, Infrastructure and Industry Committee  
Parliament House  
by email: sdiic@parliament.qld.gov.au

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### **Submission: Inquiry into the *Regional Planning Interests Bill 2013***

Southern Downs Protection Group (SDPG) welcomes this opportunity to make a submission on this important piece of legislation.

SDPG is a member of the Lock the Gate Alliance, a network of hundreds of local groups and thousands of individual members concerned about inappropriate mining activities and the impacts of coal and gas extraction on water resources and agricultural lands, community health and our treasured environmental and cultural sites.

The Regional Planning Interests Bill 2013 will lead to the loss and degradation of priority agricultural lands, water resources and environmentally sensitive areas to coal and gas mining. The failure to replace the Strategic Cropping Land Act with statutory provisions to protect Priority Agricultural Areas and Priority Living Areas is shortsighted and completely inconsistent with the government's desire to double agricultural production by 2040. In our view, the RIP Bill will lead to the degradation, fragmentation and ultimately loss of Queensland's prime agricultural lands.

SDPG understands that in the lead up to 2012 state election, Campbell Newman wrote to the Lock the Gate Alliance. He stated: "An LNP Government has made a strong, clear commitment to protect strategic cropping land for the future. An LNP Government: **will ensure there will be no open cut mining on strategic cropping land; and won't allow underground mining, coal seam gas activity or other development on strategic cropping land if it is likely to have a significant, adverse impact on the productive capacity of that land to produce food and fibre in the future.**"

In our view, the Regional Plans are based on an undefined premise of 'co-existence'. The Regional Plan for the Darling Downs does nothing to resolve land conflict between mining and agriculture.

We note that the "Priority Agricultural Areas," identified in the regional plan are limited in extent and there is no prohibition of coal mining and gas extraction from these most important agricultural areas either in this Bill, or in the Regional Plans. There is no provision for an agricultural impact assessment before giving coal and gas companies access to the most productive agricultural lands, irreplaceable water resources and to country towns. There is no clear prohibition on mining and gas extraction within 2km of residential areas and growth areas, or important agricultural lands and critical water resources. Without unequivocal statutory protection, we fear the result will be further loss of agricultural lands, environmentally sensitive areas and critical water resources to mining activities.

The Bill defines strategic environmental area as an area “shown on a map in a regional plan as a strategic environmental area” but no such map exists in the Darling Downs Regional Plan.

This Bill does not prevent mining activity in the three areas of regional interest: priority agricultural areas, priority living areas and strategic environmental areas. Rather, it makes it an offence to undertake mining activity in one of these areas *without a regional authority*. We have no doubt that this new bureaucratic process will be swiftly resolved in favour of any company wishing to mine or extract unconventional gas from the 3 areas of regional interest.

The Bill is littered with loopholes. No indication is given as to what constitutes a “major” amendment to an existing Environmental Authority (s17(3) ). Section 18 provides exemptions for resource activities. Section 23 creates a 12 month loophole for restoration activities but fails to mention monitoring of any kind while sections 24 and 25 effectively create a loophole for resource authority holders to damage priority agricultural areas if they are doing it “in accordance with a resource activity work plan”.

SDPG holds the view that there should be no 'ifs, buts or maybes' about the need to protect the resources on which life depends – food producing land and water resources - and legislation to ensure their protection should apply equally to all members of the Queensland community and to all companies doing business in this state.

In conclusion, we find this Bill to be ill-conceived and we urge the Committee to strongly recommend its rejection, or at the very least, recommend that it be substantially amended by the Queensland Parliament.

Your sincerely,

A handwritten signature in black ink, appearing to read 'Sarah Moles', written over a horizontal line.

Sarah Moles  
President,  
Southern Downs Protection Group