

# Impact Analysis Statement

## Summary IAS

### Details

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| <b>Lead department</b>  | Department of State Development, Infrastructure and Planning                               |
| <b>Name of the proposal</b>   | Protecting the Condamine Alluvium  |
| <b>Submission type</b><br>(Summary IAS / Consultation IAS / Decision IAS) | Summary Impact Analysis Statement (IAS)  |
| <b>Title of related legislative or regulatory instrument</b>              | <i>Regional Planning Interests Act 2014</i><br>Regional Planning Interests Regulation 2019 |
| <b>Date of issue</b>  | 10 December 2025   |

#### What is the nature, size and scope of the problem? What are the objectives of government action?

The Queensland Government has committed to requiring gas companies to demonstrate beyond any reasonable doubt that new gas projects would not have a detrimental impact on the Condamine Alluvium, a large and significant water aquifer (Government Election Commitment; GEC20).

The scope of this IAS is in relation to the proposed amendments to the *Regional Planning Interests Act 2014* and Regional Planning Interests Regulation 2014. It is important to note that to address GEC20, these amendments are in conjunction with other amendments proposed to the *Environmental Protection Act 1994* (EP Act), and *Mineral and Energy Resources (Common Provisions) Act 2014* (MERC Act). Separate IASs are drafted for the EP and MERC Act amendments.

#### **Resource and agricultural activities in the Condamine Alluvium**

The Condamine Alluvium is a major aquifer within the Surat Basin that is a vital groundwater resource for high value agricultural land in the Condamine Alluvium area which includes the Southern Downs, Toowoomba, and Western Downs regional council areas, and the towns of Dalby and Cecil Plains. The region includes dryland and irrigated cropping and other intensified agricultural land uses.

As the Condamine Alluvium overlays a section of the Walloon Coal Measures, the region is also largely under resource tenure. Over \$50 billion has been privately invested in these coal seam gas (CSG) projects, primarily as up-front capital costs with the investments paying off over the full life of the multi-decade projects. Only approximately 41 per cent of the proven and probable gas (2P) reserves associated with petroleum leases in the Condamine Alluvium have been developed to date, with 574 existing gas wells drilled through the Condamine Alluvium aquifer to extract CSG located in the underlying geology.

#### **Water quality and quantity in the Condamine Alluvium**

The Condamine Alluvium aquifer is extensively managed to protect water quality and water availability for human uses and the environment, under the EP Act, Chapter 2 and 3 of the *Water Act 2000* (Water Act) and at the federal level the *Water Act 2007* (Cwlth) and *Basin Plan 2012* (Cwlth).

The environmental values and water quality objectives for waters are defined in the *Environmental Protection Regulation 2019* (EP Regulation) and Environmental Protection (Water and Wetland Biodiversity) Policy 2019 (EPP Water) and must be considered and addressed in an application for an environmental authority (EA), where proponents are proposing to undertake a resource activity including a CSG activity.

### ***Consideration of coexistence***

Queensland's resources sector operates within a coexistence framework that seeks to balance the rights and interests of the resources sector with those of landholders so that resource activities can coexist with agricultural activities and other land uses.

While CSG operators have a statutory right to remove underground water as it is necessary to extract the gas, this is alongside use of underground water for other uses. The agricultural use of groundwater from irrigation bores relies on groundwater levels and water quality, which may be impacted by CSG extraction. Some landholders in the Condamine Alluvium have raised concerns about CSG impacts on the water quality and groundwater levels of the aquifer. These concerns about protection of the aquifer are hindering successful coexistence in some cases.

Additionally, the resources industry has raised concerns around the regulatory burden associated with the current regulation of CSG activities in the Condamine Alluvium, as the current approval process for a new CSG activity is complex, involving a number of separate assessments and approvals by different administering authorities.

There is an opportunity to consolidate and legislate the management of activities that intersect with the Condamine Alluvium aquifer, provide greater certainty and clarity for industry and support improved outcomes for landholders. This may include consideration of a deemed condition in future environmental authorities (EAs) and eligibility criteria for environmentally relevant activity (ERA) standards, and clarify and improve processes for compensation for impacts of CSG-induced subsidence. These provisions are intended to work together to deliver GEC20.

### ***The size and scope of the problem***

In terms of landholders, the number of concerned and potentially impacted landholders is not known. However, over 2,300 primary industry businesses are located in the Condamine Alluvium area, representing almost half of the businesses in the Western Downs local government area.

In terms of the resources industry, the Condamine Alluvium intersects with 6 Authorities To Prospect (ATPs; exploration licences) and 28 Petroleum Leases (PLs; production licences) with the resource authority holders being Arrow Energy, Australia Pacific LNG, QGC, Origin and Australia CBM. There is substantial future resource activity planned, with almost 60 per cent of the 2P reserves under tenure not yet extracted, and 792 approved but not yet constructed wells. The value of these undeveloped reserves is approximately \$60.1 billion based on a sale price of \$12.36 per gigajoule.

CSG developments are large-scale, multi-decade projects with significant upfront investments required to construct the facilities and infrastructure necessary for extraction, transmission, and export. For example, the upfront costs for Queensland's major LNG projects exceeded \$60 billion. Before committing to these large, up-front investments, project proponents de-risk projects by undertaking detailed front-end planning and design, acquiring the necessary regulatory approvals and securing long-term supply agreements to underpin the investment.

While facilities and infrastructure are constructed up-front, wells are drilled progressively throughout the life of a project to maintain a steady supply of gas. The front-end construction costs are recouped gradually as resources are progressively drilled, extracted and sold over the course of several decades following initial establishment of facilities and infrastructure.

Under the current RPI Act framework, a regional interests development approval (RIDA) for resource or regulated activities to be undertaken within an area of regional interest unless an exemption applies. The existing broad exemptions for activities with voluntary landholder agreement, or pre-existing activities prior to the framework commencing, has resulted in extensive application of self-assessment by resource proponents to deem the proposal exempt from the requirement to obtain a RIDA.

There are currently 4 approved RIDAs in the Condamine Alluvium for CSG activities and one RIDA application under assessment.

### ***Objectives of government action***

In response to landholder and industry concerns, the Queensland Government has committed to requiring gas companies to demonstrate beyond any reasonable doubt that new gas projects would not have a detrimental impact on the Condamine Alluvium, a large and significant water aquifer used for agricultural purposes. The focus of the election commitment is to ensure the regulatory frameworks protecting the Condamine Alluvium aquifer are robust and effective.

In relation to the RPI Act, a RIDA is required for resource or regulated activities to be undertaken in an area of regional interest, unless an exemption applies.

The proposed amendments involve the removal of the requirement for a RIDA for CSG activities within an identified mapped area. In view of the application of the provisions in the region and the application of the exemptions in the RPI Act, it is considered that the amendment will streamline industry approval processes, reduce complexity, provide more certainty and improve investor confidence in Queensland's resource sector. Any existing approved RIDA within the Condamine Alluvium regulatory area prior to the regulatory amendments commencing will remain in effect.

The removal of the RIDA removes duplication with the amendments for an enhanced EA assessment. Instead, the enhanced EA assessment will address the risk of CSG activity impacts on the environmental values of the Condamine Alluvium. The EA regulatory framework has a robust assessment and compliance framework to protect and enhance environment values the Condamine Alluvium with a public notification process. Furthermore, third party submission and appeal rights apply in the EA framework and there are no exemptions other than existing approvals. The enhanced EA assessment will apply to new CSG activities, being a new site-specific or major amendment application within the Condamine Alluvium regulatory area. A separate IAS has been prepared for amendments to the EP Act framework.

To further address co-existence challenges in the Condamine Alluvium, the Authority to Prepare Cabinet submission is recommending amendments for a CSG-induced compensation framework to address CSG-induced subsidence impacts on and off-tenure in the Condamine Alluvium mapped area for which a separate IAS has been prepared. Agricultural impacts to landholders, including use of agricultural land and agro-economic impacts, will primarily be considered in the subsidence framework and therefore are not the focus of this IAS.

### What options were considered?

To achieve the objectives of government action, the Department of State Development, Infrastructure and Planning (DSDIP) undertook a review of the current regulatory framework for CSG activities.

#### **Current regulatory framework**

In Queensland, the regulation of resource activities involves multi-jurisdictional oversight across several legislative frameworks and a multi-stage process for project approval intended to balance development, economic growth, environmental protection and coexistence between landholders and competing industry sectors. The current regulatory framework for CSG activities is summarised as follows:

- *Petroleum and Gas (Production and Safety) Act 2004 (P&G Act):*  
Provides a framework to assess and grant the resource authority (RA) required to produce CSG, including an unlimited statutory right to take aquifer water while extracting the gas. The P&G Act also enables the Office of Groundwater Impact Assessment (OGIA) to provide advice about subsurface impacts from authorised activities.
- *Mineral and Energy Resources (Common Provisions) Act 2014 (MERC Act):*  
Provides a land access framework for RA holders to access private land to conduct authorised activities within the RA area, and establishes a general liability to compensate for compensable effects that occur within the RA area from authorised and advanced activities that require a Conduct and Compensation Agreement (CCA).
- *Regional Planning Interests Act 2014 (RPI Act):*  
Provides a land use planning framework to manage the impacts and coexistence of resource and regulated activities on other land uses such as agriculture. The framework requires a regional interests development approval (RIDA) for resource activities to be undertaken within an area of regional interest unless an exemption applies. Self-assessable and non-notifiable exemptions include where the resource authority holder has a voluntary landowner agreement in place for the resource activities and will not have a significant impact (self-assessable) on the priority agricultural area (PAA) or strategic cropping area (SCA) or impact another landowner, or is a pre-existing activity prior to the area of regional interest being prescribed.
- *Environmental Protection Act 1994 (EP Act):*  
Provides an assessment, compliance and enforcement framework to manage the impact of environmentally relevant activities (ERAs), including resource activities, on environmental values and environmental authorities (EAs) issued at the resource tenure level, to undertake these ERAs.
- *Water Act 2000 (Water Act):*  
Chapter 3 provides a framework for understanding and managing underground water impacts, focusing on impacts to landholder water bores from resource activities, including CSG, due to the statutory right to take underground water. This includes requiring an Underground Water Impact Report (UWIR) for the Surat Cumulative Management Area (which includes the Condamine Alluvium)

to assess impacts that underpin the 'make good' framework. Chapter 3A sets out OGIA's functions and powers related to the assessing and managing underground impacts in cumulative management areas.

There are limitations and gaps in all frameworks to enable a comprehensive and collective assessment to ensure appropriate accountability to the resource operators, such as through compliance and enforcement, and to ensure compensation and 'make good' for landowners that could experience impacts to their farming operations.

#### ***Mapped area for regulatory amendments***

To deliver GEC20, a map is needed to define the geographical area that will apply to amendments regulating CSG activities in the Condamine Alluvium. An outstanding policy matter for resolution through targeted consultation and collaboration of an Interdepartmental Committee (IDC) with relevant state government agencies was to determine the mapped area guided by the following principles, that it:

- is within the Surat Basin Cumulative Management Area;
- gives consideration to landholder rights;
- should capture new CSG activities in the area;
- and be clear, easy to understand and consistent with existing mapping to the greatest extent possible.

Currently, under the Regional Planning Interests Regulation 2014 (RPI Regulation), the Condamine Alluvium is prescribed as a regionally significant water source and defined as the Upper Condamine Alluvium (Central Condamine Alluvium) and the Upper Condamine Alluvium (Tributaries) under the *Basin Plan 2012 (Cwlth)*. This mapping aligns with the existing boundaries for the management of groundwater under the *Water Act* and the *Water Act 2007 (Cwlth)* / *Basin Plan 2012 (Cwlth)*. Within the existing Condamine Alluvium, is the Taroom Trough which is basin-centred, deep, tight gas reservoir, CSG is not the primary target resource in this area.

Alternative means of differentiating between resource types (CSG, basin-centred, etc.) through legislative definitions or bespoke assessment criteria will require a level of expertise within agencies, and result in increased complexity and regulatory burden for all stakeholders. This can be avoided through a spatial definition rather than a geological definition.

Four mapping options have been identified, in increasing order of change from the status quo:

- *Option 1:* Status quo using existing Condamine Alluvium mapping, including the Taroom Trough.
- *Option 2:* Existing Condamine Alluvium mapping, excluding the Taroom Trough.
- *Option 3:* Upper Condamine Alluvium (Central Condamine Alluvium) only, excluding all tributaries.
- *Option 4:* New tailored mapped area.

#### ***Options for delivering GEC20***

Key risks to the aquifer from CSG activities include potential impacts on water quality due to connectivity between the Walloon Coal Measure and the aquifer, and potential impacts on groundwater levels from the removal of water quantity that is a necessary activity for CSG extraction.

In developing options, consideration has been given to the effectiveness of the existing regulatory framework for protecting the Condamine Alluvium aquifer in relation to water quantity and water quality.

Noting the interaction of the proposed amendments with the other Acts, the following options were considered in relation to the RPI Act:

- *Option 1:* Status quo (no changes to any framework).
- *Option 2:* Amendments to the RPI Act only.
- *Option 3:* Amendments to the RPI Act and EP Act and MERCP Act (noting consideration of the amendments to other Acts are also considered under separate IASs).

## What are the impacts?

### **Impacts of mapped area for regulatory amendments**

#### ***Option 1: Existing Condamine Alluvium mapping, including the Taroom Trough***

This option proposes to use the existing Condamine Alluvium mapping that also includes the Taroom Trough. As a basin-centred, deep, tight gas reservoir, CSG is not the primary target resource in the Taroom Trough and the potential impacts of CSG activities are less than for other parts of the Condamine Alluvium. There are no existing CSG wells in the Taroom Trough, and six planned but not constructed wells to the eastern side adjacent to the broader Condamine Alluvium area. The Taroom Trough is subject to ongoing competitive tender for the right to apply for an Authority to Prospect (exploration licence). Many non-CSG tenures are intersected by the Taroom Trough because of the long, linear nature of the western most tributary.

*Impacts for industry:* New framework to apply to the Taroom Trough, which in the last five years, over \$120M has been invested in exploration in the Taroom Trough; the most exploration activity of any region in Queensland.

This option could result in double regulation for industry as resource companies operating in the Taroom Trough could be targeting both CSG and tight gas. Tight gas would be regulated by the existing RPI framework (require a RIDA) and CSG would be regulated by the new Condamine Alluvium framework (not require a RIDA). This could increase confusion and uncertainty for industry with overlapping regulation that may discourage investment in the Taroom Trough for Queensland's resource sector.

*Impacts for landholders:* All of the existing Condamine Alluvium area is captured and is likely to align with landholder expectations of delivery for the election commitment. The map is also clear, easy to understand and consistent with existing mapping to the greatest extent possible and aligns with the Surat Cumulative Management Area prescribed in the Water Act 2000.

*Other impacts:* No risk of confusing industry and other stakeholders with new mapping, as it does not require any new mapping by utilising the existing Condamine Alluvium mapping defined in the RPI Regulation.

#### ***Option 2: Existing Condamine Alluvium mapping, not including the tributary within the Taroom Trough area***

This option represents a small change to the existing mapping, to not include the tributary within the Taroom Trough area. This option aligns with the guiding principle of being consistent with existing mapping to the greatest extent possible.

*Impacts for industry:* This option removes the potential double regulation for industry operating in the Taroom Trough described in Option 1, ensuring investment and exploration of the Taroom Trough is not affected by the regulatory proposal to protect the Condamine Alluvium.

*Impacts for landholders:* This option will have the same impact for landholders as Option 1 because the Taroom Trough exploration areas do not overlap Priority Agricultural Areas (PAAs) and OGIA has confirmed that there is practically no groundwater use from the aquifer in this location.

*Other impacts:* Creates a new mapping that except for the removal of the tributary within the Taroom Trough area, follows the same boundary as the existing Condamine Alluvium area defined under the RPI Regulation. This may cause confusion for landholders and the broader community as to why a new map is required that only excises a small area of the Condamine Alluvium tributaries.

#### ***Option 3: Upper Condamine Alluvium (Central Condamine Alluvium) only, excluding all tributaries***

This option proposes using the existing Condamine Alluvium mapping, without the tributaries, meaning the regulatory amendments will only apply to the central area of the Condamine Alluvium. This would not require new mapping to be created as the Condamine Alluvium is comprised of two parts, with one being the Central Condamine Alluvium area and can be referred to separately under the RPI Act or RPI Regulation for this regulatory proposal. However, removal of all tributaries would also not include the Taroom Trough area.

*Impacts for industry:* Similar to option 2, this option removes the potential double regulation for industry operating in the Taroom Trough to ensure investment and exploration of the Taroom Trough is not affected by the regulatory proposal to protect the Condamine Alluvium.



*Impacts for landholders:* This option limits consideration of impacts on the aquifer and landholders compared with Options 1 and 2 and may not align with expectations as all tributaries, including tributaries not overlapping with the Taroom Trough, have been excluded.

*Other impacts:* Creates new mapping by referring solely to the existing Central Condamine Alluvium area mapping. This may increase confusion as to why the regulatory proposal only applies to the Central Condamine Alluvium area and not tributaries as well.

**Option 4: New tailored mapped area.**

This option involves creating a new tailored mapped area for the regulatory proposal to apply to the Condamine Alluvium. This may include defining new boundaries that do not align with the existing Condamine Alluvium mapping, excluding the Taroom Trough area. The mapping could be targeted to ensure only high risk areas of the Condamine Alluvium area are subject to the regulatory proposal to protect its environmental values.

*Impacts for industry:* This option removes the potential double regulation for industry operating in the Taroom Trough to ensure investment and exploration of the Taroom Trough is not affected by the regulatory proposal to protect the Condamine Alluvium. However, this may increase confusion as to why a new tailored mapped area is required in addition to the existing Condamine Alluvium mapped area.

*Impacts for landholders:* This option may not address landholder expectations as any potential reduction in the mapped area based on risk would exclude some landholders from the regulatory proposal to protect the environmental values of the Condamine Alluvium and access to compensation processes from CSG-induced subsidence impacts.

*Other impacts:* Creates new tailored mapping that may increase confusion as to why a separate boundary is required to identify the Condamine Alluvium rather than utilising existing mapping either in full or part.

**Impacts of options to deliver GEC20**

**Option 1: No regulatory change, maintain status quo**

This option maintains the current regulatory and legislative settings without introducing new protections or reforms. It relies on existing regulatory frameworks under the P&G Act, MERC Act, EP Act, Water Act and RPI Act to address the issues identified that require government action.

This option seeks no change to the current framework and would mean there would be a continued requirement for resource activities being undertaken in the area to seek a RIDA unless there is a relevant exemption. Despite the RPI Act having been in place for 10 years, many CSG activities fit within relevant exemptions, meaning a RIDA is not required. The continued operation of the framework as it currently operates would mean that there is continued incentive for proponents to pursue voluntary agreements with land holders under the exemption under s22 of the RPI Act, in order to not require a RIDA.

This is evidenced by there being 4 decided and approved RIDAs, 1 under assessment and 3 applications that have been withdrawn related to CSG activities within the Condamine Alluvium area.

This option would mean that requirements for EAs would remain the same, and no amendments to the application of the compensation framework under the MERC Act. With no change, the existing impacts in the Condamine Alluvium would continue.

*Impacts on the aquifer:* The UWIR findings demonstrate that the current frameworks under the Water Act and EP Act are sufficient to protect both the quality and quantity of water in the Condamine Alluvium aquifer.

*Impacts on industry regulatory burden:* This option does not address industry's concerns about regulatory burden associated with CSG activities in the Condamine Alluvium.

*Impacts on community:* This option does not address the issues consistently raised in the community about the consideration of the impact of CSG activities on landholders. In relation to the RPI Act, the existing framework does provide an incentive for resource proponents to pursue agreements with landholders in order to gain an exemption from the RPI Act framework.

**Option 2: Amendments to the RPI framework only**

This option proposes improvements to reform and bolster the RPI Act, including the removal of exemptions to obtain a RIDA given the RPI Act currently provides broad exemptions for activities with low (self-assessed) or previously approved impacts. This would require all resource (including CSG activities) in a priority agricultural area (PAA) or the strategic cropping area (SCA) to require a RIDA.

The RPI Act framework is structured to consider land use coexistence, however approvals are tied with the land, not with the entity, unlike other legislative frameworks which regulate impacts. While there are also third party appeal rights under this framework, affected landowners do have appeal rights. This option also retains DSDIP as another regulator, further complicating potential overlap between environmental and planning assessments and adding red tape to industry.

*Impacts on the aquifer:* Despite the RPI framework being in place for more than a decade, RIDAs have been infrequently sought due to the exemption provisions. Therefore, the removal of the RIDA for new CSG activities is unlikely to have a significant impact on the protection of the aquifer as per Option 1 to maintain the status quo.

*Impacts on industry regulatory burden:* This option increases regulatory complexity by adding new approval layers and assessment requirements, which may burden proponents and regulators. The removal of exemptions will mean that a RIDA will be required for all resource and regulated activities under the RPI Act, meaning resource proponents will need to allocate sufficient time and resources to planning for mandatory RIDA applications. It also ensures mandatory notification, consultation, and impact assessment for all CSG projects, including those affecting the Condamine Alluvium.

Given the existing RIDA's in place, and resource activities with exemptions under the RPI Act, it is difficult to anticipate the scale of application of this option and what activities may require a RIDA going forward.

*Impacts on community:* This option may address the issues consistently raised in the community about the consideration of the impact of CSG activities on landholders, by providing increased assurance that any proposed CSG activity is subject to the relevant assessment criteria and consideration of regional planning interests.

*Impact to government:* The Department of State Development, Infrastructure and Planning remains an additional regulator, which may not have the capacity to manage complex technical assessments effectively. Planning Group and other relevant authorities will be required to assess an increased number of RIDA applications and this may require additional staff or expertise not currently allocated.

***Option 3: Regulatory reform across planning, environmental and resource legislative frameworks, including amendments to the RPI Act and EP Act frameworks***

This option proposes applying specific mapping for the Condamine Alluvium area and expanding the scope of a CSG activity EA approval process through legislative and operational amendments by:

- amending the RPI Regulation to identify the Condamine Alluvium as a specific mapped area
- amending the EP Act to clarify the environmental outcomes to protect the environmental values of the Condamine Alluvium aquifer
- amending the RPI Act to remove the requirement to obtain a RIDA for a new CSG activity where in the mapped areas in the Condamine Alluvium, streamlining approvals.

The MERCAP Act will also be amended to increase landholder compensation rights for landholders in the Condamine Alluvium by extending compensation rights to include landholders located off the resource authority area in the mapped area, who are materially impacted by CSG-induced subsidence impacts on land from new CSG activities.

This approach provides a robust framework for the assessment of new CSG activities in the Condamine Alluvium, with strong compliance and enforcement powers through an existing regulatory framework under the EP Act, broad EA conditioning authority, increased third-party appeal rights and a shift from blanket restrictions to risk-based assessments, supporting new CSG activities where appropriate. The EA framework has integrity and is well respected by a broad range of stakeholders as it is well-regarded for providing a comprehensive assessment, consultation and compliance features.

It also streamlines approvals by removing the requirement to obtain a RIDA and provides a comprehensive delivery of the objectives. The increase of compensation rights to landholder off the resource authority area will ensure applicable landholders impacted from a CSG activity in the Condamine Alluvium are eligible for compensation.

However, it does not directly address the protection of agricultural land use or future agricultural potential as the objective of the EP Act is limited to protecting environmental values and would require significant legislative changes and coordination across multiple agencies. The proposed reforms will improve landholders' opportunity to engage in and challenge the EA assessment.

*Impacts on the aquifer:* EP Act amendments including a new deemed condition aims to achieve a positive environmental outcome by preventing any environmental harm from new CSG activities to the environmental values of the Condamine Alluvium, including restricting the interconnection of the target

gas producing formation and the Condamine Alluvium aquifer. However, as described for Option 2, it is not possible to predict the scale of the impact as this will depend on the extent to which industry undertakes activities that meet the definition of 'new CSG activities'. Given there are 786 approved, but not constructed, CSG wells in the mapped area, it is expected that the impact on the aquifer could be minor.

*Impacts on industry regulatory burden:* Streamlined approvals, with the removal of the RIDA and the primary assessment of impact through the EA under the EP Act. CSG operators will be required to increase financial compensation to address impacts off tenement and these impacts may require significant rectification.

*Impacts on community:* The option retains robust EA compliance and conditioning powers, mandatory consultation, and third-party appeal rights, ensuring transparency and accountability. Landholders who are impacted where off tenure would be eligible to seek compensation from CSG activities, noting this process removes pro-active action by the resource proponent and involves time and effort by landholders (post impact occurring).

*Other impacts:* The broader reform holistically addresses issues which lead to GEC20. This option delivers a comprehensive response to the objectives by combining strong environmental regulation, water protections, and enhanced landholder rights. It balances environmental integrity with social equity and procedural efficiency, positioning it as a strong candidate to deliver the objectives.

### Who was consulted?

Targeted consultation was undertaken to confirm and validate the key issues and inform the drafting instructions for the reform. Initial targeted consultation occurred through October and November with the resource industry (Australian Energy Producers, Origin, Australia Pacific LNG and Arrow Energy), agricultural industry (AgForce, Queensland Farmers Federation and Cotton Australia) and Lock the Gate.

A coordinated government approach was undertaken in preparing amendments to the legislative framework. DSDIP formed and chaired an Interdepartmental Committee (IDC) and associated Officers Working Group (OWG) with representatives from:

- Department of the Premier and Cabinet
- Queensland Treasury
- Department of Local Government, Water and Volunteers
- Department of Primary Industries
- Department of the Environment, Tourism, Science and Innovation
- Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development
- Officer of the Coordinator-General, and
- The Office of Groundwater Impact Assessment.

The IDC and OWG worked collaboratively to resolve a range of technical and policy matters, in particular the mapped area and defining 'new CSG activities' within the package of reforms.

Further consultation will be undertaken during drafting and ahead of introduction of legislative amendments to ensure stakeholder views are appropriately considered in drafting of the proposed legislative reform. It is intended that targeted consultation with industry, peak bodies, local governments and other key stakeholders will occur prior to Introduction of the Bill. This may involve consulting on policy or on the draft legislative provisions in the Bill. Stakeholders consulted during October and November emphasised the importance of both clarity and detailed explanation of the proposed reform given the complexity of the current and proposed framework.

### What is the recommended option and why?

The issues in the Condamine Alluvium are complicated from multiple perspectives. The interconnection between the aquifer and CSG extraction activities is technically complex. The regulatory environment is multi-jurisdictional and existing legislative frameworks balance a wide range of competing interests. While there are existing frameworks for managing groundwater impacts, a coordinated government approach is needed to deliver this government commitment, through the strengthening of protections for the water aquifer and the streamlining of resource industry approvals in the Condamine Alluvium area.



This approach is proposed to promote community confidence and ensure a clear operating environment for agricultural and CSG industries to deliver GEC20.

### **Recommended option for mapping**

The recommended mapping option is **Option 2: existing Condamine Alluvium mapping, not including tributary within the Taroom Trough area**. Option 2 is recommended as the applicable area for regulatory change as it is largely consistent with the existing Condamine Alluvium mapping; covers the majority of the CSG wells in the broader area and covers the mapped priority agricultural area and existing cropping land. The Taroom Trough is recommended not to be captured, given the ongoing investment and exploration, different geomorphology of this area and no existing CSG wells in the Taroom Trough; however, there are six planned but not constructed wells that are not anticipated to be future CSG wells.

This option removes the potential for double regulation of industry operating in the Condamine Alluvium while minimising impacts of the change to landholders and uses existing mapping to the greatest extent possible.

As the Condamine Alluvium is currently mapped in the RPI Regulation, it is proposed that this new mapped area be defined as an additional map in the RPI Regulation through a new head of power in the RPI Act.

To ensure the important values of the Condamine Alluvium are protected and impacts are managed, the mapping of the Condamine Alluvium will take precedence over all other mapping. The mapped area will apply to regulatory changes to the RPI Act, EP Act, and MERC Act (including the subsidence management and compensation framework).

### **Recommended option to deliver GEC20**

The draft UWIR findings demonstrate that the current frameworks under the Water Act and EP Act are sufficiently protecting the quality of water in the Condamine Alluvium aquifer and managing expected impacts to landholder water bores. Therefore, Option 1 (status quo) is a viable option for the delivery of GEC20. However, to support the full delivery of GEC20, amendments are required to provide greater clarity and assurance by imposing mandatory requirements (through deemed conditions) to protect and enhance the environmental values of the Condamine Alluvium. Given broader landholder concerns, additional amendments including an expanded compensation framework for CSG-induced subsidence impacts on agricultural activities will also be included. Given that GEC20 has been publicly announced, and targeted consultation with stakeholders outlined a range of reform options, it is unlikely that the status quo would meet stakeholder expectations for delivery of the election commitment. Additionally, this option does not address the regulatory burden for the CSG industry operating in the Condamine Alluvium.

The recommended option to deliver GEC20 is **Option 3: Regulatory reform across planning, environmental and resource legislative frameworks, including amendments to the RPI Act and EP Act frameworks**. It is a comprehensive approach that combines strengthened environmental regulation with clarified landholder protections, offering a balanced and pragmatic framework for managing CSG activity impacts on the Condamine Alluvium as an important aquifer. This option provides a clearer assessment process for CSG activities in the Condamine Alluvium.

This option provides the greatest protection possible for the aquifer without applying retrospectivity and streamlines regulatory approval processes for industry.

As a RIDA will no longer be required, the overall process to undertake a new CSG activity will be streamlined, removing the need to obtain three separate approvals and reducing assessment costs as only the RA and EA approvals will be required. The scope of compensation will be increased to landholders off tenure, meaning resource proponents will be required to provide increased compensation where an applicable landholder is impacted from CSG-induced subsidence within a prescribed distance. However, the extent of the changes will only be applicable within the Condamine Alluvium area.

Although the recommended approach will result in the removal of the requirement to obtain a RIDA for a CSG activity in the Condamine Alluvium to assess and manage impacts on PAA and SCA, the RPI Act currently provides broad exemptions for activities with low (self-assessment) or previously approved impacts. These include pre-existing activities, those with written landholder consent and no significant impact, short-term activities (less than one year) and activities authorised under other legislation prior to the RPI Act commencement on 13 June 2014 (where the locations were known). In practice, many activities in the Condamine Alluvium already qualify for a RIDA exemption.

Combined with a limited compliance and enforcement framework, a range of impacts on agricultural activities in the Condamine Alluvium are not being considered under the RIDA process at present. Therefore, removing the RIDA requirement does not represent a significant change in how impacts of agricultural activities are currently being assessed.

It is important to acknowledge that despite the amendments proposed in the recommended option, extensive future CSG activity (i.e. constructing and drilling new CSG wells) will occur in the new mapped area (specific locations unknown) as it has already been approved under the current the EP framework and provisions being introduced will not be retrospective. However, monitoring for impacts to date indicates no significant concerns about the water quality or quantity of the Condamine Alluvium aquifer.

## Impact assessment

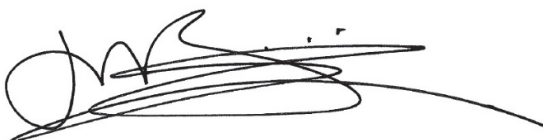
|   | First full year  | First 10 years**   |
|---|--|--|
| <b>Direct costs – Compliance costs*</b> | Direct costs cannot be quantified at this time. Compliance and enforcement activities associated with future legislative amendments will be the responsibility of the Department of the Environment, Tourism, Science and Innovation, the Department of Natural Resources and Mines, Manufacturing, Regional and Rural Development who will consider whether any additional funding is required for future legislative amendments. | Direct costs cannot be quantified at this time. Compliance and enforcement activities associated with future legislative amendments will be the responsibility of the Department of the Environment, Tourism, Science and Innovation, the Department of Natural Resources and Mines, Manufacturing, Regional and Rural Development who will consider whether any additional funding is required for future legislative amendments. |
| <b>Direct costs – Government costs</b>  | As above   | As above   |

\* The *direct costs calculator tool* (available a) should be used to calculate direct costs of regulatory burden. If the proposal has no costs, report as zero. \*\*Agency to note where a longer or different timeframe may be more appropriate.

## Signed



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John Sosso  
Director-General  
Department of State Development, Infrastructure and Planning  
Date: 10/12/2025



.....  
Jarrod Bleijie MP  
Deputy Premier,  
Minister for State Development, Infrastructure and Planning and Minister for Industrial Relations  
Date: 10/12/2025