



The Queensland Murray-Darling Committee Inc. Comments on the Draft General Beneficial Use Approval Associated water (including coal seam gas water)

13 December 2013

Submission To:

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These comments are presented by the Acting Chief Executive Officer, Lisa Yorkston, on behalf of the Queensland Murray-Darling Committee Inc. (QMDC). QMDC is a regional natural resource management group that supports communities in the Queensland Murray-Darling Basin to sustainably manage their natural resources.

1.0 General comments

1.1 Avoiding adverse impacts

QMDC asserts that the *Draft General Beneficial Use Approval Associated water (including coal seam gas water)* (the *Draft Approval*) should demonstrate how it promotes sustainable natural resource management processes by providing a high level of stewardship for both natural resources and those communities dependent on them. QMDC believes if the *Draft Approval* is to contribute to the overarching legislative framework to control and manage the impacts of coal seam gas development within the Queensland Murray-Darling Basin it must be implemented primarily to prevent avoidable adverse impacts to the region's natural resources, community, and economy in the short and long term.

1.2 Lack of science and research to support proposed beneficial use

QMDC does not support the application in its entirety because the *Statement of Reasons* for the application HAVE NOT provided any proven science on which to judge the credibility and integrity of the proposed use of associated water. The very title of this application suggests a waster product, which potentially contains a range of chemical components (natural and other) that when mixed with other chemical compounds will have impacts unknown.



Addressing only pH and TDS levels is unacceptable. Consequentially what science has been relied upon to set these levels for all the listed types of uses?

1.3 Well- considered environmental management standards and user responsibilities

There is an ever-increasing community expectation amongst QMDC member organisations and the landholders we work with that legislation, policy and planning instruments have an environmental and social bottom line that provide higher levels of protection based on a set of well-considered environmental management standards.

QMDC asserts that regulators need to have comprehensive and accurate knowledge of the workings and capacity of the industry and stringent controls are needed because at the very least “beneficial use” of coal seam gas water is not a tried practice in the proposed types of use. It is a very new activity and in our opinion requires a mandatory approach to monitoring and reporting.

Voluntary reports often fail to address certain issues. Leaving it up to the user to merely consider “additional” fundamental soil and water quality testing is not acceptable.

There will be no standardisation of the information found in voluntary reports because of the varying choices and approaches of different companies and users. There is potentially the risk of non-disclosure of negative performance. The reports are time and event specific. Users may disclose information when it suits their interests, but not when it may negatively influence perceptions, or relate to future earnings and potential cash flows negatively

Communities seek dependability and certainty, namely the ability to specify expected behavior from users, coal seam gas mining companies and the regulator.

How will the voluntary reporting be used to review the activities permitted? If the results from any voluntary monitoring show there are some adverse impacts how will that affect beneficial use approval?

1.4 Inherent assumptions about types of use and lack of risk

QMDC is alarmed that the Draft Approval is making assumptions about the following types of uses and lack of risk or hazards associated with using coal seam gas water for the related activities:

- Construction
- Research and development
- Domestic and drinking water
- Coal washing
- Dust suppression.

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QMDC asserts that reporting and notification obligations must be improved in order to address identified major flaws of conventional risk assessment. QMDC argues that what the regulations may deem as acceptable levels of risk does not always align to current public concern and the value communities place on preventing harm (minor and serious) to the environment, to themselves, their families and communities, to the future generations and current scientific knowledge.

2.0 Recommendation

QMDC recommends that this Draft Approval application be rejected in its entirety.