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Email: [suratUWIR@rdmw.qld.gov.au](mailto:suratUWIR@rdmw.qld.gov.au)

26-11-2021

Dear Sanjeev

**Re: Submission to the Consultation Draft Underground Water Impact Report (UWIR) 2021  
for the Surat Cumulative Management Area**

Cotton Australia represents Australia's 1,400 cotton growers, many of them who operate within the Surat Cumulative Management Area (CMA).

Cotton Australia acknowledges the 2021 Draft Underground Water Impact Report (UWIR) and congratulates the Office of Groundwater Impact Assessment (OGIA) on its production, and the detailed scientific work that underpins the work of OGIA.

Cotton Australia is an active member of the Queensland Farmers Federation (QFF) and endorses its submission on the draft report. Cotton Australia also has a close working relationship with the Central Downs Irrigators Limited (CDIL), attended its AGM on November 23 at which OGIA presented, and urges OGIA to take into account all feedback that was given at that meeting.

Cotton Australia's Coal Seam Gas policy can best be summarised as:

- ) The water resource utilised by our growers need to be protected.
- ) The productive capacity of the land needs to be protected.
- ) If CSG does occur, the land holder needs to be properly compensated.

Cotton Australia recognises the "honest broker" reputation that OGIA has established since its inception in the area of underground water impact monitoring and reporting, and its role in ensuring the water "make-good" provisions are identified.

Cotton Australia has no specific comments to make on the Draft report's water impacts, other than to confirm Cotton Australia's continued confidence in OGIA's work.

Cotton Australia is fully supportive of the extension of OGIA's responsibility to identify and continually monitor land subsidence resulting from the extraction of Coal Seam Gas.

Cotton Australia sees this report as being the critical first formal recognition that subsidence is a real problem. This recognition is welcome.

To be clear, Cotton Australia's position is that it recognises subsidence caused by CSG extraction is real, however, the extent of the impact, and in turn the degree of economic loss that will be caused by this subsidence is unclear.

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We acknowledge the report is a significant step, but it is only the first. In our opinion it signals the need for much greater effort and research into this issue, with the view of continual improvement in data acquisition, modelling, ground-truthing and reporting.

Cotton Australia will defer to other submissions identifying specific gaps or concerns regarding the subsidence data included in the report and identified gaps.

Subsidence is the current biggest single threat to CSG extraction meeting the requirements under the Cotton Australia CSG Policy as summarised above.

Cotton Australia strongly supports any efforts to bring the regulation of subsidence into a similar framework that governs the “make good” requirements when certain water impacts have been identified.

We strongly encourage an urgent joint effort between landholder representatives, resource industry representatives, Gasfields Commission, OGIA, Department of Resources and other appropriate government agencies to develop adequate legislative provisions, that will unequivocally provide landholders with an appropriate rectification/compensatory pathway should they suffer an economic loss cause by CSG extraction.

Cotton Australia does respectfully suggest that the UWIR is seen by many stakeholders as an opportunity for an overall report on the impact of CSG extraction on our environment, industry and communities, but the current content is limited and does not meet stakeholder expectations.

We understand that the scope of OGIA’s report is currently limited to its obligations, but it would be very beneficial if the report could either formally include, or have simultaneously released reports from the responsible agencies, that include information on (but not limited to):

- ) Compliance action taken in regard to CSG extraction
- ) Beneficial Use of CSG associated extracted water
- ) Number of Conduct and Compensation Agreement

This provision of information could be further enhanced by cross linking of website holding the above information.

For further information on this submission please contact Michael Murray – 0427 707 868 or [michaelm@cotton.org.au](mailto:michaelm@cotton.org.au) .

Yours sincerely,



Michael Murray,  
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Cotton Australia