Impact Analysis Statement

Details

Lead department	Department of State Development, Infrastructure and Planning
Name of the proposal	Regional Planning Interests (Condamine Alluvium) and Other Legislation Amendment Bill 2026
Submission type	Summary Impact Analysis Statement
Title of related legislative or regulatory instrument	*Regional Planning Interests Act 2014* Regional Planning Interests Regulation 2014
Date of issue	18 March 2026

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). To deliver GEC20, amendments are proposed to the *Regional Planning Interests Act 2014* (RPI Act), *Environmental Protection Act 1994* (EP Act), and the *Mineral and Energy Resources (Common Provisions) Act 2014* (MERCP Act) through the Regional Planning Interests (Condamine Alluvium) and Other Legislation Amendment Bill 2026 (the Bill). The scope of this analysis is limited to the amendments to the RPI Act and Regional Planning Interests Regulation 2014 (RPI Regulation). Separate analysis has been undertaken of the impacts of the EP Act amendments and MERCP Act amendments in the Bill. ***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 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. ***Coexistence issues*** 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. Landholders in the Condamine Alluvium have raised concerns about CSG impacts on groundwater levels and water quality which are hindering coexistence. While CSG operators have a statutory right to take underground water as it is a necessary activity to extract the gas, the agricultural use of groundwater from irrigation bores relies on groundwater levels and water quality, which may be impacted by CSG extraction. Additionally, some Condamine Alluvium landholders have raised concerns about impacts to farm productivity from CSG-induced subsidence on irrigated and dry land cropping due to changes in land slope and drainage. ***Regulatory burden*** 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 new CSG

activities is complex and lengthy, involving separate assessments and approvals by several administering authorities.

These assessments and approvals include resource authorities (RAs), including Authorities to Prospect (ATPs) and Petroleum Leases (PLs), issued by the Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development (DNRMMRRD); environmental authorities (EAs) issued by the Department of the Environment, Tourism, Science and Innovation (DETSI); and regional interests development approvals (RIDAs) issued by the Department of State Development, Infrastructure and Planning (DSDIP) where required. Under the current RPI framework, a RIDA is required for resource or regulated activities (such as CSG activities) within an area of regional interest unless an exemption applies.

RAs and EAs are sought by proponents during the project planning stage, and must be in place before project commencement, whereas applications for RIDAs are often submitted after project commencement.

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 business are located in the Condamine Alluvium area.

In terms of the resources industry, the Condamine Alluvium intersects with 6 ATPs (exploration licences) and 28 PLs (production licences) across five main resource authority holders. There are substantial future resource activities planned in the area, with almost 60 per cent of the proved and probable reserves under tenure not yet extracted. 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 exportation. For example, the upfront costs for Queensland's major LNG projects exceeded $60 billion. Before committing financially, proponents derisk 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.

Under the RPI framework, the Condamine Alluvium is prescribed as an area of regional interest. There are currently five approved RIDAs in the Condamine Alluvium for CSG activities and one RIDA application for a CSG activity under assessment. It is likely that there are resource authority holders operating in the area subject to exemption from a RIDA, however this data is not captured by DSDIP.

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 commitment is to ensure the regulatory frameworks protecting the Condamine Alluvium aquifer are robust and effective.

The following objectives of government action are comprehensively addressed by DETSI and DNRMMRRD in the analysis of the EP Act amendments and MERCP Act amendments:

- to ensure the water quality of the Condamine Alluvium is protected from new CSG projects
- to address landholder concerns regarding CSG-induced subsidence impacts.

These objectives will be met through amendments to the EP Act to enhance the EA process, and amendments to the MERCP Act to expand compensation for CSG-induced subsidence impacts, including new off-tenure compensation liability. Agricultural impacts to landholders will primarily be considered in the subsidence compensation framework.

The objectives of government action addressed in this analysis are:

- to specify the geographical area that will apply to the reform package to deliver GEC20
- to relieve regulatory burden by streamlining industry approval processes.

What options were considered?

Current regulatory framework

In Queensland, the regulation of resource activities involves several legislative frameworks and a multi-stage process for project approvals intended to balance development, economic growth, environmental protection and coexistence between landholders and the resources sector.

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 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.
- MERCP 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).
- 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 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.
- 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 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 assessment and management of underground impacts in cumulative management areas.

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. The mapped area will apply to regulatory changes to the RPI Act, EP Act and MERCP Act.

Currently, under the 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 mapping is an area known as the Taroom Trough. As a basin-centred, deep, tight gas reservoir, CSG is not the primary target resource in the Taroom Trough.

Two mapping options were considered:

- *Option 1:* Status quo using existing Condamine Alluvium mapping, including the tributary within the Taroom Trough area.
- *Option 2:* Existing Condamine Alluvium mapping, excluding the tributary within the Taroom Trough area.

Streamlining industry approval processes

Two options to relieve regulatory burden by streamlining industry approval processes were identified:

- *Option 1:* Status quo, where a RIDA is required for CSG activities in the Condamine Alluvium area unless an exemption applies.
- *Option 2:* Removing the requirement for a RIDA for CSG activities in the Condamine Alluvium area, and shifting the assessment to the EA process.

What are the impacts?

Impacts of mapped area for regulatory amendments

Option 1: Status quo using existing Condamine Alluvium mapping, including the tributary within the Taroom Trough area

This option proposes to use the existing Condamine Alluvium mapping that includes the area known as the Taroom Trough. The Taroom Trough is subject to ongoing competitive tender for the right to apply for an ATP (exploration licence).

As a basin-centred deep, tight gas reservoir, CSG is not the primary target resource in the Taroom Trough. Many non-CSG tenures are intersected by the Taroom Trough because of the long, linear nature of the western most Condamine Alluvium tributary.

Impacts for industry

While CSG is not the primary target resource in the Taroom Trough, it is possible that resource companies could target both CSG and basin-centred gas. The CSG would be regulated by the new Condamine Alluvium framework (not require a RIDA), while the basin-centred gas would be regulated by the existing RPI framework (require a RIDA). This overlapping regulation could increase uncertainty, risk and the regulatory burden for industry.

Impacts for landholders

As all of the existing Condamine Alluvium area is captured, this option is likely to align with landholder expectations for delivery of the election commitment. The map is clear, easy to understand, and aligns with the Surat Cumulative Management Area prescribed in the Water Act.

Impacts for government

The policy intent of the reform is to only capture new CSG activities in the Condamine Alluvium area, rather than all new resource activities. Alternative means of differentiating between resource types, such as CSG vs basin-centred, 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.

Option 2: Existing Condamine Alluvium mapping, excluding the tributary within the Taroom Trough area

This option represents a small change to the existing mapping, by following the same boundary as the existing Condamine Alluvium area defined under the RPI Regulation but excluding 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.

As CSG is not the primary target resource in the Taroom Trough, the potential impacts of CSG activities are less than for other parts of the Condamine Alluvium.

Impacts for industry

This option removes the potential overlapping regulation for industry operating in the Taroom Trough described in Option 1, ensuring investment in 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 Strategic Cropping Areas (SCAs) and OGIA has confirmed that there is practically no groundwater use from the aquifer in this location.

Impacts for government

The use of a spatial definition to capture new CSG activity in the Condamine Alluvium will reduce the regulatory burden for government and other stakeholders, by being clearer and simpler to apply than a geological definition.

Impacts of streamlining industry approval processes

Option 1: Status quo, where a RIDA is required for CSG activities in the Condamine Alluvium area unless an exemption applies

This option seeks no change to the current RPI framework and would mean there would be a continued requirement for proponents undertaking CSG activities in the Condamine Alluvium area to seek a RIDA unless there is a relevant exemption.

Impacts for industry

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

Impacts for landholders

The existing framework provides an incentive for resource proponents to pursue voluntary agreements with landholders in order to gain a RIDA exemption under s22 of the RPI Act. The current framework also leads to uncertainty for landholders, as RIDAs can be sought after a project has commenced rather than upfront alongside resource tenures and EAs.

Impacts for government

Under this option, DSDIP remains a regulator, undertaking planning and land use assessments that add red tape to industry.

Option 2: Removing the requirement for a RIDA for CSG activities in the Condamine Alluvium area, and shifting the assessment to the EA process

Under this option, RIDAs will not be required for CSG activities in the newly mapped Condamine Alluvium area, with assessment shifted to the EA process.

Impacts for industry

Removing the requirement for a RIDA and shifting the primary assessment of impact of CSG activities in the Condamine Alluvium area to the familiar EA process will front-load and streamline the approval process, and reduce the regulatory burden, for industry proponents.

This option retains the robust EA compliance and conditioning powers, mandatory consultation, and third-party appeal rights, ensuring transparency and accountability.

Impacts for landholders and the community

Through front-loading the approval process, this option reduces uncertainty and provides clarity to landholders.

Removing the RIDA may remove the incentive for authority holders to enter into a voluntary CCA with a landholder, over a court imposed agreement, which allows negotiation of locations for access tracks, pipelines, and wells and impacts to agricultural productivity. It is anticipated that the existing requirement under the MERCP Act for a CCA can achieve a similar intent, requiring a CCA to be in place prior to the commencement of advanced activities, such as drilling of wells. The MERCP Act includes an escalating dispute resolution pathway to encourage parties to come to an agreement to avoid a Land Court imposed CCA.

Additionally, landholders may perceive the removal of the RIDA as the removal of protection of environmental values. In practice, many activities in the Condamine Alluvium qualify for RIDA exemptions evidenced by there being only five decided and approved CSG applications in the Condamine Alluvium since the RPI Act commenced in 2014. 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. Removing the RIDA requirement does not represent a significant change in how impacts of agricultural activities are currently being assessed.

Landholders will instead benefit from stronger compliance and enforcement provisions under the EP Act whereby amendments to the EP Act will introduce a deemed condition for the protection of water quality in the mapped area. The deemed condition will be legislated through the EP Act and will automatically apply to environmental authorities that meet the criteria in the Act.

Impacts for government The removal of the RIDA will improve regulatory efficiency by reducing the complexity and multi-stage approval process for a new CSG activity.
Who was consulted?
Targeted consultation was undertaken to inform the proposed reforms between October and November 2025 with the resource industry, agricultural industry and community groups and in February 2026 with the resource industry, agricultural industry, Toowoomba Regional Council, and Western Downs Regional Council. 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 across government. 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. Consulted stakeholders were provided the opportunity to submit written feedback by 20 February 2026, to supplement the live feedback provided during the consultation sessions. Written feedback was received from Australian Energy Producers, AgForce, Arrow Energy, Cotton Australia and Queensland Farmers Federation. Additional briefing sessions were held with the agricultural and resources sectors in March 2026 to further clarify responses to their feedback and the impact of the reforms. All feedback has been considered and addressed. Stakeholders were generally supportive of the policy intent of the proposed reforms. General support for the amendments to the RPI Act was provided with some clarifying questions and suggestions raised regarding the application of the applicable area boundaries and protection of agricultural values.
What is the recommended option and why?
Recommended option for mapping *Option 2: existing Condamine Alluvium mapping, excluding the 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 existing and planned CSG wells in the broader area and includes existing priority agricultural areas and strategic cropping areas. The Taroom Trough is recommended not to be captured because CSG is not the target resource in the area. If development of the Taroom Trough proceeds, the gas targets are well below the groundwater resources GEC20 seeks to protect. While the geology is very complex, importantly, it does not interact with the Condamine Alluvium. This option removes the potential for overlapping 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. The mapped area will apply to regulatory changes to the RPI Act, EP Act, and MERCP Act set out in the Bill. **Recommended option for streamlining regulatory approvals** *Option 2: Removing the requirement for a RIDA for CSG activities in the Condamine Alluvium area, and shifting the assessment to the EA process.* As the RIDA is generally sought as the final approval for a new CSG activity currently, removing this approval requirement will provide a more predictable, front-loaded approval process to streamline industry approval processes, reduce complexity and also improve investor confidence in Queensland's resources sector. The front-loaded approval process will also provide clarity and certainty to landholders. In line with the election commitment and Cabinet approval, the RIDA removal will not be applied retrospectively. Clarifying transitional provisions ensure that the RIDAs for carrying out a CSG activity in the mapped area that are in effect immediately before the commencement of the Bill will not be affected by the Bill, effectively meaning that the RIDAs and RPI Act continue to apply as if the Bill had not come into effect.

Resource or regulated activities that are not a CSG activity will still require a RIDA for an area of regional interest, such as a PAA or SCA, in the Condamine Alluvium area.

This streamlining 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 for providing a comprehensive assessment, consultation and compliance features by a broad range of stakeholders.

Predicted costs of the proposal (streamlining industry approvals)

In relation to streamlining industry approvals, the predicted costs of the proposal are not considered significant on the basis that removing the RIDA for CSG activities in the Condamine Alluvium CSG area will only apply to a small number of resource companies, and represents only a small change to how the RPI Act operates in practice in the area.

Impact assessment

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

* The *direct costs calculator tool* (available at www.treasury.qld.gov.au/betterregulation) 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

John Sosso
Director-General
Department of State Development, Infrastructure and Planning
Date: 16/03/2026

Jarrod Bleijie MP
Deputy Premier, Minister for State Development, Infrastructure and Planning and Minister for Industrial Relations
Date: 18/03/2026