

RE: IPART's Draft Report CSG Landholder Benchmark Compensation Framework

This submission has been prepared on behalf of the Mullaley Gas and Pipeline Accord (MGPA). The MGPA is an incorporated entity that represents community concerns of approximately 100 residents and businesses of Mullaley and surrounding districts. All members of the Mullaley Gas and Pipeline Accord are involved in primary production and associated industries. The MGPA submits that IPART's Draft Report into Landholder benchmark compensation rates omits to deal with certain issues relating to maintaining a productive agricultural industry and attempts to make recommendations based on insufficient information.

* Clearly IPART's Draft Report is based on the premise that the CSG Industry and agricultural land use of any description can co-exist. This is simply not true and in fact The Mineral Resources Department document, "Effects of Land Use on Coal Resources", prepared by the Coal Resources Development Committee in 1994, identifies the conflict between CSG and existing surface land use. A recent example of CSG not co-existing with agriculture is evident in Queensland where a legal precedent was set with the Court ruling that a CSG company had precluded landholders from conducting an extensive cattle grazing business in the most economically efficient manner because of the impost of CSG infrastructure and therefore were required to purchase these holdings.

* As has been identified there are absolutely no insurance companies that will insure agricultural landholders against the risks associated with the CSG industry and this exposes food and fibre producers to loss of status eg., organic or liability in the event of contamination of the food chain due to contamination of soil, water, plants or animals.

* The Government should not support the CSG industry which [a] is not necessary as stated by the Australia Energy Market Operator in their recent "Gas Statement of Opportunities", ie there is no forecast shortage of gas, [b] will by virtue of it's activities enable CSG companies to enjoy lucrative profits to the detriment of food security which goes directly against the basic premise of law, and [c] the vast majority of the populace does not support as shown by the numerous plebiscites & polls.

* The Government has failed to comply with a commitment it made, firstly by the Deputy Premier and then by the Office of Chief of Staff of the Minister Anthony Roberts, that they would instruct the Chief Scientist Mary O'Kane to review the report commissioned by The Great Artesian Bore Water Users Association titled, "Great Artesian Basin Recharge Systems and Extent of Petroleum and Gas Leases" by SoilFutures Consulting. This report was peer reviewed by Andrea Broughton-Maloney. MSc. - Hydrogeologist (Groundwater SolutionsInternational Pty Ltd, NZ), Professor Ian Acworth - Hydrogeologist (University of NSW, Water Research Laboratories), Dr Brian Smerdon - Senior Hydrogeologist (Alberta Energy Regulator, Canada), Dr Beke Gredner Manager Groundwater Protection Zones, Verden (Bremen), Germany. Making it a report of extreme importance when making any credible decisions regarding Santos' Narrabri Gas Project in the Pilliga which is one of the most important recharge zones of the Great Artesian Basin. The Great Artesian Basin underlies 22% of Australia's land mass upon which the overlying agricultural enterprises rely.

* Loss or contamination of underground water would result in the cessation of many agricultural enterprises. To date in Australia there is no known method of remediating a contaminated aquifer. To suggest that it is possible to compensate for such an event is absurd particularly as the

timeframe of when the contamination is detected is unknown at the outset, ie. it may be days, weeks, months, years, decades, centuries etc. ...later.

* MGPA has always maintained the position that, as with Lock the Gate, the GasField Free surveys were conducted in such a manner that they will withstand any scrutiny as to their veracity. The area surveyed so far is in excess of 3,000,000 hectares in North West NSW with 96.5 % of agricultural landholders and rural communities stating they wish to be Gasfield Free and are not interested in any form of involvement in with CSG industry and will not participate in any way that might insinuate compliance or complacency so they can participate in any or all Class Actions against damages to their businesses . NB. Northern Cattle Producers vs Government over the Indonesian Live Cattle Export ban

* The Idea that the CSG industry or the State Government can compensate for adverse health impacts is very simply completely at odds with any form of common decency and perhaps the State Government needs to reaffirm itself with it's basic Charter of Governance which is that of Safe Guarding Public Health. To even suggest that there is just compensation for ill health as a result of being forced to live in a CSG field is ludicrous. For example, there may be no payment large enough to make a blinded person as well off as if the injury had not occurred.