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**8 DECEMBER 2023**

**Coexistence Institutions & CSG-Induced  
Subsidence Management Framework  
Feedback**

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**WESTERN DOWNS REGIONAL COUNCIL  
SUBMISSION**

**Part A: Proposed amendments related to risk-based management of CSG-induced subsidence.**

1. **Question One:** Do you have any feedback on the proposed expansion of the Office of Groundwater Impact Assessment's role?

**RESPONSE:** Western Downs Regional Council acknowledges that CSG-induced subsidence is a contentious issue and there are challenges in balancing the needs of the resource and agricultural sectors. In principle, Council is highly supportive of increased oversight and management of the risk of CSG-induced subsidence. For the Office of Groundwater Impact Assessments expanded role to be successful, it will need to be appropriately resourced, including with staff who have expertise in CSG-induced subsidence and by conducting meaningful engagement and consultation with landholders. Additionally, Western Downs Regional Council strongly recommends that Office of Groundwater Impact Assessment's staff are located within CSG catchment areas, including the Western Downs region.

Western Downs Regional Council acknowledges that agriculture is the largest industry and employer in the region and that the resource sector is the second largest employer in the region. Both industries are significant in the Western Downs region, making substantial contributions to gross regional product. Balancing the interests of resource authority holders, landholders and community stakeholders is key to both the agricultural and resource sectors' strength and the continued growth of the Western Downs economy.

Western Downs Regional Council acknowledges that CSG-induced subsidence is a contentious issue and supports the expanded function of the Office of Groundwater Impact Assessment (OGIA) to increase oversight and management of the risk of CSG-induced subsidence.

To be successful in achieving the stated aims of the proposed expansion of OGIA's role, the organisation must be properly resourced. Recommendations include:

- Expanding OGIA's current staff to include those with expertise in CSG-induced subsidence.
- Locating OGIA's staff within CSG catchment areas, including the Western Downs region.
- Regular training for staff on the latest methodologies and technologies in ground water assessment, particularly in the areas of advance modeling tools, monitoring system in tracking ground movements and subsidence over time and risk assessment of geological conditions, extraction methods and other relevant factors.
- Fostering interdisciplinary collaboration or seeking support from agronomists, geologists, and specialists in other relevant disciplines to provide a holistic perspective of the assessment.
- Engagement of stakeholders in promoting transparent communication to make informed decisions regarding groundwater use and protection.
- Implementing streamlined data management system
- Ensuring that the privacy of landholders, property information and data is always maintained to ensure a foundation of trust between OGIA, tenure holders and landholders. This is particularly important in instances where landholders are required to supply information under the proposed Framework.

Western Downs Regional Council has received feedback that OGIA staff demonstrating comprehensive knowledge of the CSG-induced subsidence, and associated risks and management, will be critical to the organisation building trust and credibility with local landholders as its role expands into this new domain.

2. **Question Two:** Do you have any feedback on the proposed CSG-induced subsidence management Framework?

**RESPONSE:** Western Downs Regional Council provides the following feedback on the proposed CSG-induced subsidence management framework and strongly recommends the following changes are considered and, where appropriate, implemented to better support the resource industry and landholders.

- **Baseline Data:** Ensure site-specific data, confirmed by onsite assessments, are developed over time. Data is collected by tenure holders, in consultation with landholders in the first instance and provided to OGIA. OGIA then develops Farm Field Assessments and Inter-Farm Drainage Assessments to ensure uniformity of assessments between operations of different companies on different properties.
- **Impact Management Strategy:** Periodic and supplementary reports prepared by OGIA are provided to landholders as a part of meaningful and ongoing consultation process.
- **Farm Field Assessments & Inter-Farm Drainage Assessment:** The requirement of a 12-month lead time between the completion of Assessment work and the start of production appears to be an unnecessary delay in the commencement of production which could adversely impact businesses and the wider economy of the Western Downs Region.
- **Subsidence Management Action Plan:** The requirement for an Action Plan is replaced with a process like the water bore make-good arrangement. Subsidence impacts are managed and mitigated shortly before they are forecast to occur or as they are identified. The nature of subsidence makes proactive remediation and mitigation impractical.
- **Subsidence Agreement:** The requirement for a pre-agreed Agreement is replaced with a process like the water bore make-good arrangement. Subsidence impacts are mitigated, remediated and compensation is made based on actual impacts, rather than predicted impacts. The nature of subsidence and range of factors affecting it makes mitigation, remediation, and compensation agreements in advance impractical.
- **Consultation and Engagement:** Substantial revisions are made to the proposed Framework (outlined below) to ensure land holders are appropriately engaged as critical stakeholders in CSG operations and that the risk of consultation fatigue for both landholders and tenure holders is limited

### Baseline Data

When collecting data and information to inform the Subsidence Impact Report and Post-Subsidence Impact Report, Western Downs Regional Council strongly urges that the baselines established are robust and developed over time. This is of critical importance for affected fields which support crops such as cotton, where fields are seasonally levelled, graded and planting beds built up, producing varying

baselines depending at what point in the growing season baseline measurements are taken. For this reason, Council strongly recommends that landholders endorse baseline measurements which form the basis of risk assessments as part of the Management Framework to ensure that baseline measurements accurately reflect the specific location they are capturing.

Western Downs Regional Council strongly urges that baselines are site specific, confirmed by onsite assessments and endorsed by the landholder. Desktop analysis alone is insufficient for determining baselines. It is also unclear in the current proposal the scope of baseline information required to be collected by tenure holders. For example, is baseline data required for all properties in an identified area, or only properties identified in the Subsidence Impact Report?

Council suggests there is an opportunity to reduce the impact on the resource industry and landholders by restructuring the proposal for how baseline data is gathered and collated. A more streamlined approach may be for tenure holders to provide data directly to OGIA, and for OGIA to develop the items required for the development of Farm-Field Assessments and Inter-Farm Drainage Reports. This would allow OGIA to also identify and gather further information as required to better inform subsidence management on properties at greater risk. This approach would reduce the impact on industry and landholders, streamlining the development of baselines, Farm Field and Inter-Farm Drainage Reports. It will also ensure that there is uniform development of assessments across CSG operations by differing companies.

### **Impact Management Strategy**

Western Downs Regional Council supports the reporting of OGIA's assessment and management strategies every 3 years in a Subsidence Impact Report, to be supplemented with annual review and evaluation. Council strongly urges that these periodic and supplementary reports are provided to landholders for endorsement as part of the ongoing subsidence management Framework. This will facilitate ongoing consultation and engagement with landholders, ensure that landholders are provided regular opportunity to provide OGIA with feedback on subsidence impacts on their land and allow for the identification and resolution of problems early, before escalation to formal dispute resolution processes.

### **Farm Field Assessments & Inter-Farm Drainage Assessment**

Western Downs Regional Council suggests the removal of the requirement for tenure holders to consider current and future production within 5 kilometers of the property boundary. This requirement appears to duplicate work already captured by OGIA as production phasing is included in OGIA's modelling which determines the properties requiring Farm Field Assessments and Inter-Farm Drainage Assessments in the first instance.

Council endorses the proposal for Assessments to be conducted before production on at-risk properties starts but queries the need for a 12-month lead time between the completion of Assessment work and

the start of production. This appears to be an unnecessary delay in the commencement of production which could adversely impact businesses and the wider economy of the Western Downs Region.

### **Subsidence Management Action Plan**

The purpose of the Subsidence Management Action Plan appears to be at odds with the nature of subsidence itself where proactive remedial and mitigation works are not possible. The impacts of subsidence cannot be rectified prior to their occurrence. Western Downs Regional Council suggests a framework for managing subsidence impacts consistent with the make good framework currently in place for managing impacts on water bores where tenure holders are required to 'make good' on bores which experience or are likely to experience 'impaired capacity' and make good on the impact. Council suggests this would be a more appropriate approach to managing the practicalities of subsidence impacts on landholders and their properties. The expansion of the make good framework would also streamline the management of the impacts of CSG activities for tenure holders and landholders, rather than requiring vastly differing processes to manage each issue.

Western Downs Regional Council also queries the need for a 12-month lead time between the agreement of a Subsidence Management Action Plan and the commencement of production. This appears to be an unnecessary delay in the commencement of production which could adversely impact businesses and the wider economy of the Western Downs Region.

### **Subsidence Agreement**

Western Downs Regional Council queries the requirement, in areas where production has not already commenced, for a Subsidence Agreement to be made 12 months before production begins. This appears to be an unnecessary delay in the commencement of production after an agreement has been made which could adversely impact businesses and the wider economy of the Western Downs Region.

Western Downs Regional Council also queries the practicality of making a Subsidence Agreement between tenure holders and landholders before production begins. The impacts of CSG operations will occur over time, and effects will be cumulative based on the number of wells operating in a given region. The predicted impacts of these wells will change over time as development phasing changes and modelling tools are improved. Any CSG-induced subsidence impacts will occur over time and the required remediation cannot be determined before operations begin. It is an unreasonable assumption that the impacts of the many factors influencing CSG-induced subsidence can be accurately predicted, possibly years, in advance.

Council recommends that like water bore make good agreements, the requirement for tenure holders to reach an agreement, mitigate the impact and compensate landholders accordingly is embedded in the proposed Framework, but that a make good agreement is not required ahead of the commencement of production. Instead, it is recommended that a make good agreement is required a short time before the impact is predicted to occur, or immediately upon an impact being identified. This approach would be more practical and consistent with existing frameworks. It will also allow for landholder and property

specific concerns and practices to be considered at the time of the remedial works are undertaken and ensure that compensation is accurately calculated. It also offers more protection for both landholders and tenure holders than the current proposal. When Subsidence Agreements are made based on predictions, rather than actual or imminent impacts, landholders may be afforded insufficient protections and compensation, or tenure holders may be committed to excessive mitigation and compensation activities.

### **Consultation and Engagement**

Western Downs Regional Council strongly urges that the proposed CSG-induced Subsidence Management Framework prioritise the involvement of landholders from the outset. From a local government perspective, meaningful and early engagement and consultation with stakeholders is critical to the success of resource operations in the Western Downs region. While the current proposed Framework does recognise that landholders are uniquely positioned to provide information and data about affected land, there appears to be no early and ongoing consultation or engagement with landholders in the proposed Framework. To ensure best outcomes for landholders, tenure holders and to mitigate the risk of disputes, landholders should be meaningfully engaged by OGIA and tenure holders throughout the process of developing the Subsidence Impact Report and Post-Subsidence Impact Report.

When working with landholders, it is important that OGIA and tenure holders recognise the pre-existing demands on primary producer's time and ensure that information gathering activities and consultation activities do not place undue stress on landholders or impose an unreasonable additional burden to their existing activities.

Western Downs Regional Council proposes that engagement and consultation of landholders occurs in three stages.

#### **1. Subsidence Impact Report Phase**

- OGIA and tenure holders engage landholders to assist in facilitating information gathering.
- Tenure holders engage landholders in the first instance to assist in gathering baseline information and data. Information and data are then provided to OGIA for the development of a Farm Field Assessment and Inter-Farm Drainage Assessments.
- OGIA engages landholders to obtain additional information as required for subsidence management on particularly at-risk properties.

#### **2. Post-Subsidence Impact Report Phase (A)**

- OGIA consults with landholders regarding the baselines established and resultant Farm Field Assessments and Inter-Farm Drainage Assessments.
- Landholders can endorse or dispute baselines and resultant Assessments which will form the basis of future mitigation, remediation, and compensation agreements with tenure holders.

- Landholder endorsement of baselines and Assessments be required before commencement of CSG production activities.

### **3. Post-Subsidence Impact Report Phase (B)**

- Tenure holders consult landholders to develop a Subsidence Agreement a short time before forecasted subsidence impacts occur, or immediately upon impacts being identified.
- Like the water bore make good agreement framework, this approach will ensure that the required impact mitigation and remediation is appropriate for the actual impacts and compensation can be accurately calculated.

This amendment to the proposed Framework consolidates the consultation, engagement, and endorsement process to ensure that landholders are appropriately engaged by tenure holders and OGIA as critical stakeholders while balancing the risk of consultation fatigue for both landholders and tenure holders.

### **3. Question Three:** Do you have any feedback on the proposed land risk assessment framework?

**RESPONSE:** Western Downs Regional Council provides the following feedback on the proposed land risk assessment framework and strongly recommends the following changes are made to better support the resource industry and landholders.

- **Preliminary and Advanced Activities:** The definition of preliminary and advanced activities in the *Mineral and Energy Resources (Common Provisions) Act 2014* determines the designation of activities, not tenure holders. It is strongly recommended that preliminary activities do not require a risk assessment, but advanced activities do require a risk assessment, to reflect the differing level of risk posed by each activity type.
- **Cumulative Impacts:** Further clarity is provided regarding whether cumulative impacts are included in risk assessments or excluded. Further clarification is required regarding the proposed framework for cumulative risk.
- **Regional Risk Assessments:** Where a regional risk assessment by OGIA identifies potential risks to transport infrastructure, major infrastructure, or environmental assets, a mechanism be established within the proposed Framework for notifying local government of the identified risks.

It is strongly recommended that landholders are meaningfully supported and educated about their rights and responsibilities under the proposed land risk assessment framework to ensure they are well positioned to maximise the opportunities presented by resources accessed on their properties, while managing risks and impacts of development on their land and agricultural activities.

Western Downs Regional Council acknowledges that agriculture is the largest industry and employer in the region and that the resource sector is the second largest employer in the region. Both industries are significant in the Western Downs region, making substantial contributions to gross regional product. Balancing the interests of resource authority holders, landholders and community stakeholders is key to both the agricultural and resource sectors' strength and the continued growth of the Western Downs economy.



## **Preliminary and Advanced Activities**

Western Downs Regional Council strongly urges that the *Mineral and Energy Resources (Common Provisions) Act 2014 (MERC Act 2014)* definitions continue to determine what constitutes a preliminary activity or advanced resource activity, rather than making this the purview of tenure holders. This will remove the need for a potentially lengthy dispute resolution process if landholders disagree with the subjective assessment of tenure holders regarding an activity designation. Retaining the definition in the *MERC Act 2014*, rather than leaving this open to dispute will also protect tenure holders from vexatious disputes from those who are strongly opposed to CSG activities in the region.

Making this determination the purview of tenure holders, with the option for landholders to disputes, appears to add an unnecessary burden on both landholders and may significantly increase the commencement of even basic resource activities, with adverse effects on businesses and the wider Western Downs economy.

Western Downs Regional Council strongly suggests that preliminary and advanced activities are treated differently under the Land Access Risk Assessment Framework, commensurate with the level of risk posed by each activity type.

### Preliminary Activities

For a preliminary activity, it is recommended that the requirement for an entry notice is retained. However, the development of a risk assessment, notification to the landholder of the assessment, 20 business days to dispute the risk assessment and dispute resolution process appears to be a cumbersome process which places an undue burden on both land holders and tenure holders for the level of risk posed by a preliminary activity as currently defined under the *MERC Act 2014*.

### Advanced Activities

For an advanced activity, it is recommended the requirement for a risk assessment to identify the potential impacts on landholders' property, operations, and business from resource activities is retained in the proposed Land Access Risk Assessment framework. This process is appropriate for the level of risk posed by advanced activities.

To ensure that landholders are able to make effective representations regarding risk assessments and activity types, it is strongly recommended that a high level of individualised support is offered to landholders. This is particularly important where landholders will only have 20 days to review and raise a dispute about a risk assessment or classification of a proposed activity on their land, as prescribed under the proposed Framework. This higher level of support could be provided by the GasFields Commission, or similar entity, provided it was appropriately resourced. To further support landholders, Council encourages that landholders be provided with more than 20 days to raise a dispute under the proposed Framework, to allow for the engagement of outside consultation before proceeding with a dispute claim.



Where risk assessments are applicable, Western Downs Regional Council raises a concern that the requirement of a landholder to 'accept' the risk assessment, or at least not dispute it, implies that the landholder is accepting the risk associated with the proposed activity. This requires further clarification.

Differentiating between preliminary and advanced activities will reduce the burden on both tenure holders and landholders while still ensuring risk assessments are developed for activities most likely to cause actual harm. However, this recommendation can only be effective if the definitions of preliminary and advanced activities in the *MERCP 2014* are applied in the Land Access Risk Assessment framework and not left to the discretion of tenure holders.

### **Cumulative Impacts**

It is not clear whether cumulative impacts, such as groundwater impacts and CSG-induced subsidence, are included or exempt from the scope of risk assessments completed by tenure holders under the proposed Framework. Further clarification is required regarding the proposed framework for managing cumulative risk.

### **Regional Risk Assessments**

Where a regional risk assessment by OGIA identifies potential risks to transport infrastructure, major infrastructure, or environmental assets, Council requests that a mechanism be established within the proposed Framework for notifying local government of the identified risks. This will allow local authorities to manage risks to the wider community assets, which are critical to supporting business activities, tourism and livability of the region. For example, the Western Downs region is currently experiencing a backlog of urgent maintenance on state-controlled and national highway networks. This already significantly affects primary producers, and the state of the road network can result in delays in the delivery of produce. Council being notified of further risks to the transport network will allow it to manage these risks proactively for the benefit of the community.

### **Part B: The review of coexistence institutions**

4. **Question Four:** Do you have any feedback on the proposed changes to the role of the GasFields Commission Queensland?

**RESPONSE:** Western Downs Regional Council supports the expansion of the GasFields Commission Queensland to encompass the entire resource and renewable energy sectors and also of the new functions of education, stakeholder engagement, information provision, identification of systematic coexistence issues and provision of advice to government.

It is strongly recommended that regulatory oversight remains a key theme of the GasFields Commission and is strengthened under the amendments to the GasFields Commission Act 2013, rather than removed as indicated in the current proposal. It is also strongly recommended that individualised mentoring and support is offered to landholders through the GasFields Commission to

provide education on their rights and responsibilities. This will ensure landholders are able to maximise the opportunities presented by resources accessed and renewables developments on their properties, while managing risks and impacts of development on their land and agricultural activities.

Western Downs Regional Council supports the expansion of the GasFields Commission Queensland (GFCQ) to encompass the entire resource and renewable energy sectors. Council is also supportive of a name change for the Commission to *Coexistence Queensland* to reflect these changes. To be effective in achieving the intended aims under the expanded scope of the GFCQ, the Commission will need to be appropriately resourced.

It is strongly recommended that regulatory oversight remains a key theme of the GFCQ and is strengthened under the amendments to the *GasFields Commission Act 2013*, rather than removed as indicated in the current proposal.

Western Downs Regional Council strongly recommends the proposed expanded education and stakeholder engagement function includes individualised support to landholders to address unique needs. The Land Access and Coexistence Discussion Paper cites concerns raised by landholders in relation to the lack of outreach or educational forums to assist landholders in their dealings with tenure holders or to know where to find available information to landholders. Council has received feedback from the community that meaningful education and stakeholder engagement facilitated by QGFC will require individualised mentoring, support and training for landholders affected by resource development. Landholders are individual and have individual circumstances and would prefer individual consultation to address their concerns, rather than training offered in large groups. To ensure the ongoing and unique needs of individual landholders are met, funding should be provided to support one-to-one facilitation with mentors and educators. Achieving this higher level of support to landholders will improve outcomes for landholders and reduce the likelihood of formal dispute resolution processes being initiated. In addition to this, parity in negotiation between landholders and tenure holders will be strengthened by providing landholders, who often have limited surplus resources, with support for legal costs, agronomic costs and other consultation expenses they may incur as part of the negotiation process and will assist in facilitating equitable outcomes for all negotiating parties.

5. **Question Five:** Do you have any feedback on the proposed expansion of the Land Access Ombudsman's function?

**RESPONSE:** Western Downs Regional Council supports the proposed expansion of the Land Access Ombudsman functions. Council also supports providing tenure holders and landholders with an alternative dispute resolution process, with a view to reduce escalation of matters to the Land Court Queensland.

Western Downs Regional Council supports the proposed expansion of the Land Access Ombudsman functions to include: negotiation of a conduct and compensation agreement or a make good agreement; negotiation of, or making of, the proposed Subsidence Agreements; material change in circumstances to an existing agreement; the negotiation of a compensation agreement for a mining claim or a mining

lease made under the Mineral Resources Act 1989; dispute about whether a resource activity is preliminary or advanced; disputes about land access matters or compensation agreements. Western Downs Regional Council supports providing tenure holders and landholders with an alternative dispute resolution process to reduce escalation of matters to the Land Court Queensland.

To ensure there is parity between negotiating parties in the alternate dispute resolution process, and therefore equitable outcomes, landholders will need to be educated on their rights and responsibilities regarding the opportunities presented by resources accessed on their properties, while managing risks and impacts of development on their land and agricultural activities. This will require individualised mentoring, support and training for landholders affected by resource development. In addition to this, parity in negotiation between landholders and tenure holders will be strengthened by providing landholders, who often have limited surplus resources, with support for legal costs, agronomic costs, and other consultation expenses they may incur as part of the negotiation process. Landholders are individuals and have individual circumstances and would prefer individual consultation to address their concerns, rather than training offered in large groups. To ensure the ongoing and unique needs of individual landholders are met, funding should be provided to support one-to-one facilitation with mentors and educators. Achieving this higher level of support to landholders may reduce the need for alternate dispute resolution as parties are able to make sound negotiations without entering formal dispute resolution processes.

6. **Question Six:** Do you have any additional feedback on the proposed expansion of the Office of Groundwater Impact Assessment's functions?

**RESPONSE:** Western Downs Regional Council suggests there is an opportunity to expand the Office of Groundwater Impact Assessment's functions further to include provision of advice on emerging technologies. It is also strongly recommended that the Office of Groundwater Impact Assessment actively participates in stakeholder engagement as part of its expanded functions to assist in facilitating strong relationships between landholders and tenure holders.

Western Downs Regional Council suggests there is additional opportunity for the expansion of OGIA's role to further allow for the provision of advice on emerging technologies (such as carbon capture and storage, and geo-sequestration). Further, it would be beneficial for OGIA's role to be expanded to include the provision of advice on all underground matters relating to aquifers and storage.

Western Downs Regional Council views meaningful, early, and continuing stakeholder engagement as critical to the success of resource and renewable projects in the Western Downs region. Council urges that stakeholder engagement, particularly concerning landholders, takes a more prominent role in the proposed expansion of the Office of Groundwater Impact Assessment's functions. Western Downs Regional Council considers building strong local relationships to be significant in gaining trust, acceptance and mitigating adverse impacts of resource developments in the region. Feedback provided to Council is that some resource projects have been more successful in stakeholder engagement and relationship building than others in the region. By including meaningful landholder engagement in the

CSG-Induced Subsidence Management Framework, OGIA and the Framework itself can play an active role in facilitating strong relationships between tenure holders and landholders.

7. **Question Seven:** Do you have any further feedback on the coexistence institutions and CSG-induced subsidence management Framework?

**RESPONSE:** Western Downs Regional Council supports the strengthening of mechanisms in coexistence of institutions and the CSG-induced subsidence management Framework for enforcing existing agreements between landholders and tenure holder, particularly of environmental agreements.

Western Downs Regional Council also views meaningful, early, and continuing stakeholder engagement as critical to the success of mining and renewable projects in the Western Downs region. Council urges that stakeholder engagement, particularly concerning landholders, takes a more prominent role in both the coexistence of institutions and the CSG-induced subsidence management Framework.

Western Downs Regional Council supports the strengthening of mechanisms in coexistence of institutions and the CSG-Induced Subsidence Management Framework for enforcing existing agreements between landholders and tenure holders, particularly of environmental agreements. Council has received feedback that disputes often occur between landholders and tenure holders when the conditions of existing agreements are not met. These disputes could be reduced with the strengthening of enforcement mechanisms for agreements between parties.

By providing individualised support and education to landholders through expanded operations of existing institutions, the proposed changes to coexistence of institutions can also contribute to increasing parity between landholders and tenure holders during negotiations, improving relationships between parties, reducing the need for formal dispute resolution processes, and improving outcomes for all parties.

The Land Access and Coexistence Discussion Paper cites strong feedback from landholders that current institutional arrangements do not empower landholders in their interactions with the resource industry. Western Downs Regional Council urges that the Framework has a stronger focus on land holder consultation and engagement throughout the development of Subsidence Impact Reports and Post-Subsidence Impact Reports. Land holders should endorse all reports which will influence activities, mitigation strategies and remediation processes affecting their land. This will ensure that landholders are involved and have input on the processes occurring under the Framework, allowing for the early identification of potential problems and their remediation. A structural requirement in the Framework requiring meaningful consultation with landholders will also ensure that consultation occurs more uniformly and systematically, empowering landholders, rather than being dependent on the willingness of the tenure holder to develop a relationship and consult with the landholder.

For landholders to be empowered in their interactions with tenure holders, they will need individualised mentoring, support, and training. In addition to this, parity in negotiation between landholders and tenure

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holders will be strengthened by providing landholders, who often have limited surplus resources, with support for legal costs, agronomic costs, and other consultation expenses they may incur as part of the negotiation process. Landholders are individuals and have individual circumstances. Many would prefer individual consultation to address their concerns, rather than training offered in large groups. To ensure the ongoing and unique needs of individual landholders are met, funding should be provided to support one-to-one facilitation with mentors and educators. This could be achieved through a more robust GasFields Commission Queensland, provided it was appropriately resourced to achieve this higher level of support to landholders.