

5th December 2018

Queensland Competition Authority
GPO Box 2257
Brisbane Q 4001

www.qca.org.au/submissions

Re Irrigation Price Review 2020-24

CANEGROWERS Burdekin Ltd (CBL) is a not for profit, member owned company with voluntary membership. CBL has members who are water allocation entitlement holders and farm within the Giru Groundwater Area.

CBL notes the response from SunWater regarding the Giru Benefited Groundwater Area contained under the Tariff Structures Category in Attachment A of Appendix A - Customer Engagement of the SunWater Irrigation Price Review Submission (20 November 2018).

CBL is yet to review, fully understand and prepare a response to the two reports mentioned in SunWater's submission.

The two reports being 1. Appendix K - OD Hydrology Giru Benefitted Area and
2. Geoffrey Kavanagh – Giru Benefited Area Review April 2017

- CBL is concerned that there could be deficiencies or inaccuracies contained in these reports.
- CBL is also concerned as to what level of emphasis and reliance QCA may place on these reports.
- There may be other items of an ecological and aquifer management nature that have not yet been identified that CBL would like to raise for QCA's consideration in their determinations.
- The Hydrology analysis shows that the longstanding structure of the aquifer remains with SunWater's support for the level of unsupplemented water in the GBA Groundwater Area
- CBL supports and recommend that the Authority continue with the long-standing arrangements that have been recommended in previous Price Path reviews, the most recent being the Authority's recommendation contained in the 2012-17 SunWater Irrigation Price Review at 3.8 Giru Groundwater Area on Pages 21 & 22.

Please be advised that CANEGROWERS Burdekin Ltd intends to lodge a submission noting the 22nd February closing date. Any submission may not be limited to just the concerns or issues mentioned here.

Yours sincerely



Wayne Smith
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