

20 DEC 2018

DATE RECEIVED



Enterprise of

**Banff Bros.**  
Est. 1880



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ABN: 56 705 867 119

Chair  
Queensland Competition Authority  
GPO Box 2257  
Brisbane  
Qld 4001

14<sup>th</sup> December 2018

Dear Sir,

RE: CENTRAL AND LOWER LOCKYER  
IRRIGATORS SUBMISSION UNDER SECTION 23  
OF THE QUEENSLAND COMPETITION  
AUTHORITY ACT 1997  
PRICE PATH PERIOD 2020 - 2024

This submission is a personal submission of our views.  
We hold an irrigation licence for Atkinson Dam, Lower  
Lockyer Irrigation Scheme.

While we have always known that the scheme does not  
perform as well as we would like, it is now quantified by  
the LWUF, that the scheme historically has delivered to  
the outlet just 19% of design expectations.

We also know that the natural delivery system is atrocious  
with stream losses 70-80%. This past year we saw our  
local SEQWater crew pumping about 200Ml to fulfil a  
20Ml water order. It just means there is no water  
remaining for those reliant on the scheme because they  
have no underground water supply of any substance.

Given these circumstances relevant to the price path it is  
preferable that the prices charges for Part A: Part B are  
performance based ie. 19:89 would reflect reality. We  
need water to run an irrigation business and being charged  
for a non performing asset is a rip off.

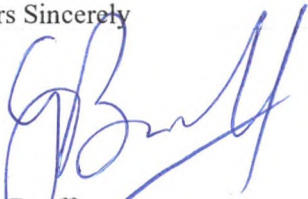
Any limitation imposed by QCA that restrict investigating  
alternative pricing arrangements are ignoring the bigger  
picture in which our business operate and impose a  
predetermined outcome that is not helpful to the customer  
and therefore a risk to the business of SEQWater.

A new approach to water pricing needs to be  
implemented.

If the QCA imposition remains then the SEQWater / LWUF joint submission suggestion of 95:5 is supported as an interim measure.

The natural flow delivery system should be upgraded to a pipe to farm system as soon as possible to stop future water losses. The Lower Lockyer is a surface supply scheme but it is not delivering on anyone's expectations, such as ourselves, that rely on surface water to remain in business.

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'Greg Banff', with a large flourish extending from the end of the signature.

Greg Banff.