

## To Whom It May Concern

### **Submission with respect to Dalrymple Bay Infrastructure Management (DBIM) application for a ruling on the pricing method applicable to the 8X expansion**

We believe the Queensland Competition Authority should further investigate some of the governance issues with DBIM prior to proceeding with making a decisions.

Specifically:

- DBIM should be considered a full subsidiary of Brookfield Infrastructure Management rather than as an independent company. Brookfield has a 49% stake after the IPO last year, but recent data suggests that Fairfax Financial Holdings Ltd, a Canadian insurer, holds another 8% of the company. We note that the chairman of Brookfield Funds Mgmt Ltd also is a long-standing board member of Fairfax. Given the close relationship between these entities, the Brookfield group effectively controls more than 50% of DBIM.
- Given the controlling Brookfield stake in DBIM, it is important to highlight Brookfield's contrasting views on the future of the coal business as opposed to what has been projected both in the applications to QCA as well as through the sale of DBIM stakes to the Queensland Investment Corporation as well as Queensland retail investors. Specifically, Brookfield's vice-chair, Mark Carney, e.g. "[Companies should pay more for pollution, says UN special envoy on climate action Mark Carney](#)", CNBC, 30 May.
- As such, we believe that DBIM's application for pricing does not contain full transparency on the governance structure, as well as how the parent company is arguing the opposing side. We ask that the QCA takes this into account when reviewing DBIM's/Brookfield's application to 'socialise' pricing on the 8X expansion.

At your service if there are any questions,

Ulf Erlandsson,

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