I am an irrigator in the Giru Benefitted Area. In the last meetings in Giru and your draft report it was suggested that GBA waterprices should gradually be raised to Burdekin channel levels based on the assumption that a natural yield is pretty much non existant. You fail to recognize that the GBA was a significant sugarcane growing area based on the natural yield of the area for around 100 years and that there was natural yield measured over several years prior to the introduction of channel water. This process was the basis for the 51/49 ratio of channel supply and natural yield that is the basis of the current pricing. I stated in my previous submission that with the arrival of the Burdekin Water, the Giru Benefitted Area lost some of its ability to store and use the natural flows in the Haughton River and other inflows. If the river and aquifier are constantly filled to the brim they can`t store as much of the natural inflows as the previous natural system that was emptied on a yearly basis in the dry season and could then capture the flows in the wet season. This was a trade off for using the river to supplement the GBA. In return Sunwater did not have to build and maintain irrigation infrastructure to supply water to its customers in the GBA. Even the 2 existing weirs in the river were taken over by Sunwater so there was almost no infrastructure cost assosiated with the onfarm delivery of our GBA allocations. If the GBA would be a normal BRIA region like the Selkirk area, Sunwater would have needed to build a similar distribution network as the one supplying Selkirk all the way from the Haughton Balancing storage. All that expense was saved while natural GBA yield was sacrificed in return. If you recalculate the price of irrigation water in the GBA now these infrastructure benefits to the BRIA should also be taken into consideration. As a consequence of these infrastructure savings GBA irrigators also do not get the same service standard as for example Selkirk customers. We have no minimum flow entitlement to start with, but we also have to pump our allocations out of the river or the aquifier. In my case that causes around $10-14 per ml just in electricity costs to pump water out of the river. Pumping the allocation out of a bore is normally much more energy intensive and more expensive. On top of the electricity we use, we also have to build and maintain the river pumping infrastructure which is exposed to river floods and gets frequently damaged or destroyed. Bores are as expensive to build and maintain. Some of the farmers even have to regulary dig supply channels in the river on top of that after every flow to be able to access water with their pumps. If we would have to pay the full Burdekin channel price we should therefore also be entitled to the same service as a normal Selkirk channel irrigator for example. So water should be supplied through a Sunwater built and maintained channel or pipeline to our farms. That should ideally enable us to use at least our minimum flow entitlement with just a small or no pump at all to get our allocation water on farm. With all those extra channels there would also come channel losses, so Sunwater would not only need to supply all the water that is allocated to the farms in the GBA but also the sytem losses in the extra GBA channels on top of that.

On top of this there are still serious questions about the current management of the GBA. There are serious questions about the accuracy of the water metering and the management of the weirs. The past figures for releases from the Haughton Balance storage seem to be a mix of some crude metering and at times of informed guessing. At the Giru meeting Sunwater could not confirm that the past figures used are 100% accurate.

Constant outflows into the Reed Beds seem to be taken as a given without any metering at all! If one of the back ends of the system leaks like that, natural yield or channel water needs to be sacrificed at the top to compensate for the losses.

Val Bird Weir has been overflowing almost constantly for years now, so downstream irrigators can be supplied. A pipeline through the weir was supposed to let enough water through the weir to supply the Giru side, while allowing freeboard on Val Bird Weir to be maintained to catch natural flows. The way things are run now not even this potential freeboard is utilized.

The Giru Weir consists of sheet piling with big rust holes in the top 40 cm or so. Therefore this weir can`t catch any natural river flows either, because the water level is roughly maintained at rust hole height so any extra water coming down over the top of Val Bird Weir would be lost through the rust holes because they make the freeboard measured from the top of Giru Weir ineffective .

Finally the Shirbourne and Giru districts are some of the Burdekin`s lowest productivity areas due to drainage and salinity issues. Any increase in cost will hit this area harder than the rest of the BRIA because the capacity to pay higher water prices is already stretched to the limit now, due to a lower yield potential and therefore lower gross income per ha compared to most other BRIA areas.