

BURDEKIN DISTRICT CANE GROWERS LIMITED

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12 December 2019

Professor Flavio Menezes
Chairman
Queensland Competition Authority
Level 27
145 Ann Street
Brisbane Queensland 4000

For Attention: Mr Darren Page - Darren.Page@qca.org.au

Dear Chair,

Further to our 4 November 2019 submission in response to the Queensland Competition Authority's draft Report "Rural Irrigation Price Review 2020-24 Part B: Sunwater, dated August 2019, we provide the following additional Late Information, that we have been advised by Mr Darren Page will be accepted and reasonable endeavours used to consider this information as part of the QCA's assessment. We further advise that we are happy for this letter and the information contained therein to be published on the QCA's website.

You will recall that one of the reasons why an extension of time had been requested for the Burdekin District Cane Growers Limited to lodge its submission after the 4 November deadline, was because Sunwater had failed to provide some critical and important information that we had requested.

QCA had advised that it would not be granting any formal extensions to the deadline and so BDCG was forced to make an incomplete submission. This was noted on page 8 of the submission (electronic page 10). After numerous requests, the information was finally provided by Sunwater last week on Tuesday 3 December 2019, after a 43-day delay.

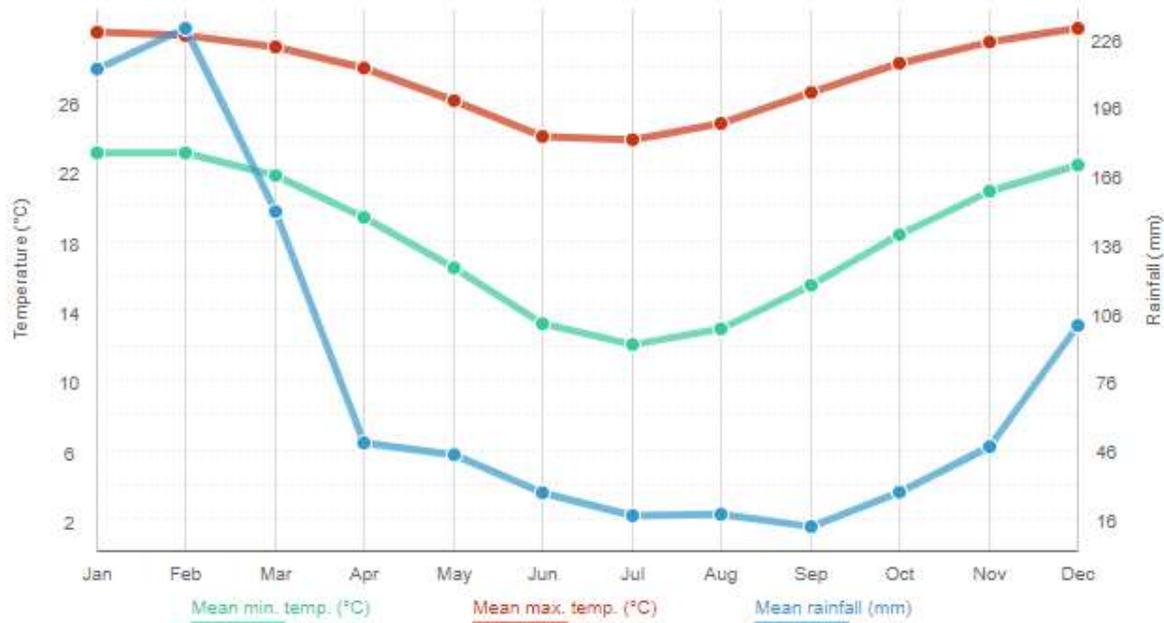
Based on the information provided, the total releases and usage for the 6 months 1/4/19 to 30/9/19 were:

Releases:	300ML + 4,230ML	= 4,530ML
Usage:	6,100ML + 7,222ML	= 13,322ML
Usage to Releases %:	13,322ML / 4,530ML	= 294%
Usage to Releases % adjusted for Channel equivalent transmission inefficiencies (64%):	13,322ML / (4,530ML X 64%)	= 2,900ML = 459%

Using estimated rainfall based on an Australian Meteorology website, BOM's Ayr (40KM south of Giru) rainfall for the months April through September, I estimate that around 160mm fell in the Burdekin district during this time.

My conclusion is that the period 1 April 2019 through to 30 September 2019 was a “dry period” and it appears that based on an assessment of usage to release data, whether adjusted for transmission inefficiencies (459%), or not (294%), there appears to be a complete inconsistency with the conclusions drawn by Water Solutions, the QCA consultant, “that GBA irrigators are receiving little contribution from natural Haughton River flows in dry periods” and “that the contribution of natural flows is very small”.

Mean rainfall and temperature



If we were to add in the usage and release data between the flood event (early February) and 1 April (a further period of 2 months), the % of usage to release gets even bigger as does the overall contribution of natural flows. And while the release information is known – there were no releases of water during this period (as advised by Sunwater) – Sunwater does not capture daily usage information and so it would not be possible to accurately calculate this information. Suffice to say the % of natural flow contribution would only get better.

The above information is critical information that disproves the conclusions drawn by Water Solutions in their report and has been provided to the QCA within 6 working days of having received information from Sunwater in response to our original question and only 5 weeks after the original deadline for submissions. As the GBA irrigators are probably one of the groups that are worst impacted by the QCA’s recommendations in its draft report, I assume consultations have not yet commenced with key stakeholders as we would have been one of the first stakeholders to have been contacted.

Yours faithfully

BURDEKIN DISTRICT CANE GROWERS LTD

MR MICHAEL KERN