

7 April 2026

The Manager  
Queensland Competition Authority  
GPO Box 2257  
BRISBANE QLD 4001

Via: [www.qca.org.au/submissions](http://www.qca.org.au/submissions)

Dear Sir or Madam

**RE: Review of RAB-Based Irrigation Prices 2027 - 2029**

Thank you for providing the opportunity of providing a submission to the above review.

CANEGROWERS Burdekin Ltd (CBL) is a member owned not-for-profit organisation which represents the interests of approximately 206 sugarcane farmers in the Burdekin district who collectively produce approximately 2,400,000 million tonnes of sugarcane on an annual basis.

The Burdekin sugarcane industry is a fully irrigated system which depends on the provision of reliable and affordable water to grow its crop, which in turn encourages continued investment in the sugarcane industry. Our industry is the backbone of the local economy and community. If the price of water becomes unaffordable and fluctuates to the point where its price predictability is eroded, so too will grower confidence to invest into and run their businesses which will have flow-on affects to productivity and ultimately impact the local community.

The current Renewals Annuity approach has served the Burdekin district well given the nature of the scheme's long life infrastructure assets. *"If it ain't broke, don't fix it"* and the Government needs to exercise extreme caution in unnecessarily interfering with a system that is functioning adequately. The Government has raised the Regulatory Asset Based (RAB) approach on numerous occasions and it is our perception that this is something the Government wants to do, despite the bulk of the schemes suppliers not being supportive of the change. As the end users of the water commodity, irrigators concerns need to be considered first and foremost and addressed throughout this consultation phases and weighted appropriately.

Our position is that we do not want to see any change from the Renewals Annuity approach as the 30 year forecasting requirement fosters a proactive and considered long term assessment of future requirements within the scheme which aligns with the long lifespan of the subject assets. The Renewals Annuity approach provides growers with a smooth, predictable, stable and transparent pricing outcome and reduces pricing shocks. Our concerns with the RAB-Based approach is that it will result in price volatility from a more short to medium term planning focus and by its design will become a revenue generator for the Government given its capitalisation bias towards expenditures which will grow an asset base over time, upon which a return on capital is levied. This will come at the expense of affordable water which will result in growers paying more for this essential commodity over time and as we know there is no other competitor from which we can source this commodity.

Moreover, our members cannot risk water pricing being set at the hands of a RAB-Based pricing approach, which at its core is an investment compounding business model that will seek to compound returns on an increasing asset base over time. This model has the potential to make water unaffordable and we must also note that scheme inefficiencies will also be compounded if the bulk of expenditures are capitalised. We believe that such a philosophy would be at odds with the Government's core principles and objectives of the Prosper 2050 initiative. Prosper 2050's success will be enhanced by the provision and take-up of reliable and affordable water and the Government's water infrastructure should be an enabler of business growth not a detractor. Profitable farmers will grow the economy and generate more revenue from which the community will ultimately benefit and the Government through increased tax revenue on a much larger pie.

CANEGROWERS is a member of QFF and CBL fully endorses the detailed submissions made by QFF to QCA in regard to this ongoing matter, including support for the Ministers Roundtable process and further consideration of key identified issues by the QCA when analysing the impacts and consequences.

We want a model that will deliver stable and transparent water prices for growers over the long term and we believe that the Renewals Annuity approach has and will continue to deliver this outcome for our members.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Betteridge', written in a cursive style.

Glenn Betteridge  
Chair