



CENTRAL DOWNS IRRIGATORS LIMITED

QCA Review of RAB-based Irrigation prices 2027-29

14 April 2026

To Whom it may concern,

Central Downs Irrigators Ltd (CDIL) is a special interest community group representing the interests of irrigation members on the Central Darling Downs in Southern Queensland. Our members stretch across the Condamine Floodplain and hold water interests in the Central Condamine Alluvium, the Condamine River, and the North Branch of the Condamine River. Our members make up a large part of the water for irrigation in the SunWater Upper Condamine Scheme.

CDIL welcomes the opportunity to provide a submission to the Review of RAB-Based Prices for 2027-29. CDIL has been engaged throughout the QCA process.

As a member of QFF, CDIL has worked with and shall be endorsing the QFF submission and accompanying report. However, we would like to emphasise a few points.

CDIL is not supportive of a RAB going forward. Whilst acknowledging a RAB may provide some benefits in the short term, we believe over the long term it will be more costly to irrigators. The evidence suggests it would also be more variable and create a lumpy pricing profile over time adding to uncertainty. There is also a risk of passing large costs onto future generations.

The irrigation businesses we are representing already deal with a great deal of uncertainty, and irrigation pricing should not add to this. It is equally unacceptable to be potentially passing on large unsustainable costs to future generations.

CDIL is of the belief that the introduction of a RAB will give Irrigators less input into large expenditure items within the scheme. It may also inadvertently incentivise SunWater to be less conservative and accountable for budgeting and timing of expenditure.

CDIL has long been an advocate for Lower bound irrigation pricing. The Upper Condamine system endured years of paying well above lower bound pricing and we firmly believe in adhering to the principle. We believe the current Annuity approach is more aligned with lower bound pricing.

The current renewals process, whilst it could be improved with greater consultation and better forecasting, does a far greater job of giving us the certainty in pricing that our businesses require.

Yours sincerely

Fraser Bligh

Director

Central Downs Irrigators Ltd