

Submission on QCA's draft report

Turf Queensland

6 August 2026

Attention Mr D. Page- Project Manager.

Re: Review of proposal to change irrigation supply schemes to Regulatory Asset Based pricing.

Turf Queensland represent Growers including Irrigator's with water supplied from both SEQWater and Sunwater.

Our turf producers on these irrigation systems have responded to us that they do not wish to transition to a RAB pricing system and prefer to stay on Renewals Annuity system for pricing.

In summary concerns have been raised

- Long term price increases leading to intergenerational inequity.
- The greater seasonality of supply, and even lack of supply periodically in schemes, is less applicable to RAB pricing.

Noted from the Review of RAB-based irrigation prices 2027-29 | Queensland Competition Authority | April 2026QFF Review of Pricing

QFF has commissioned an independent review by Highlander Consulting to assess the relative merits and performance of the Renewals Annuity and RAB frameworks. The findings indicate the Renewals Annuity framework delivers materially lower long-term prices, provides greater price stability and transparency, aligns more closely with Lower Bound Pricing under the National Water Initiative (NWI), and supports intergenerational equity. 1

By contrast, while a RAB framework may deliver lower prices in the short term, it results in structurally higher costs over time due to the compounding effect of capital growth and the application of a regulated return on capital.2

- Discussions highlight unclear definition on how works are allocated into operational or capital expenses and the need for increased awareness and scrutiny by Irrigators and willingness to engage in better communication and planning.
- Greater concern has arisen from discussions, regarding the inefficiencies in running these schemes that would be a higher priority than changing pricing methodology.
- Encourage greater consultation with Community Reference Groups regarding planning on local schemes.

Yours sincerely

Natalie Scalisi