Whitehaven

Queensland Competition Authority
Submitted electronically

27 August 2026

Dear Sir or Madam

Public Submission – QCA Draft Decision on Aurizon Network Amending Access Undertaking

I refer to the QCA draft decision dated June 2026, relating to the Aurizon Network 2025 UT5 DAAU (**2025 UT5 DAAU**).

As stated in our public submission dated 16 March 2026, Whitehaven Project Pty Ltd (**Whitehaven**) has been directly involved in the consultative process by which the 2025 UT5 DAAU was developed and signed the Implementation Deed dated 9th December 2025.

Whitehaven is satisfied that matters of importance have been reflected in the terms of the 2025 UT5 DAAU. Whitehaven does not support a draft amending access undertaking that is materially different to the 2025 UT5 DAAU submitted by Aurizon Network to the QCA on 22 December 2025.

<u>Contract volume-based pricing</u>

Whitehaven would like to specifically respond to Section 8 of the QCA draft decision regarding any notion that the Contract volume-based pricing concept should be delayed beyond the 1 July 2027 UT5 new commencement date.

It is understood that a majority of coal producers (measured by number of producers or total contracted tonnes) support the concepts outlined in the draft amending access undertaking as they relate to Contract volume-based pricing. The closer alignment of contracted volumes with actual demand reduces the incentive for individual producers to "hoard" capacity, reduces barriers to entry for new or expanding mines and reduces the impact of end of year "true up" charges on coal producers who have aligned their contract to production.

The drafting also reflects a robust negotiation process resulting in a compromise within the coal producer group, with some producers preferring stronger alignment of contract volumes and pricing (eg 100%) than the final position.

It is also understood that the number of current access agreements negotiated during UT2 is very low and therefore delaying implementation of the Contract volume-based pricing would be an unbalanced response to a relatively minor issue.

Furthermore, given the lengthy consultative process undertaken by Aurizon Network, and the timing of related contract renewals (above rail and ports), some coal producers may have negotiated long term contracts with the understanding that the Contract volume-based pricing changes would come into effect on 1 July 2027. Any delay to the implementation of the Contract volume-based pricing may leave some producers with a competitive disadvantage when compared to others.

Whitehaven believes the balanced and fairest outcome for all coal producers is for the QCA to approve the Contract volume-based pricing concept as drafted, commencing on 1 July 2027.

Please feel free to contact myself should you have any matters you would like to discuss.

Yours sincerely

Keiron Rochester
General Manager – Infrastructure
Whitehaven Coal