Water Allocation Holders Representatives

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Submissions Officer Queensland Competition Authority GPO Box 2257

5 March 2019

Brisbane Q 4001

Re: Submission by WATER ALLOCATION HOLDERS in relation to Liability for Extra Charge

We submit this submission on behalf of the Water Allocation Holders who are a group of Burdekin River Water Allocation Holders within the Lower Burdekin Water area who pump water from the Burdekin River.

Issue:

The issue which we would like addressed is that growers within the Lower Burdekin Water Board area who hold a Sunwater allocation and pump from the river pay Sunwater A and B charges in addition to a Lower Burdekin Water area charge. This effectively means these growers are paying twice for the water they use.

History:

- 1965/66 The South and North Burdekin Water Board were established by Order in Council as a water replenishment scheme and to assist in the delivery of water to areas away from the river.
- In 2007, the Water Licence holders (Most of which were prior to water boards inception and the Dams construction) were notified they would be converted to Water Allocations.
- 3. Water meters were installed at the expense of the Water Allocation Holders.

- In 2013, Water Allocation Holders in the Lower Burdekin Water areas were informed that they would be charged for Part A and Part B water charges by Sunwater.
- 5. In addition to the Sunwater charges, the Water Allocation Holders in the Lower Burdekin Water area, still have to pay the Lower Burdekin Water area charge.

General Situation:

- Lower Burdekin Water currently impose an area charge on all growers in the Lower Burdekin Water area, as well a Sunwater charge is applied to Water allocation holders.
- 2. Water Allocation Holders in the Lower Burdekin Water area are charged Sunwater A and B charges for water sourced from the Burdekin River and are also charged the Lower Burdekin Water area charge which has the effect of substantially increasing the irrigation costs of the Lower Burdekin Water area Water Allocation Holders.
- 3. Sunwater customers who are not in the Lower Burdekin Water area and who pump out of the river, pay <u>only</u> the Sunwater river rate. They are able to trade their water in the normal course. Sunwater Water Allocation Holders in a Lower Burdekin Water area, have to obtain the permission of Lower Burdekin Water to be able to effect a trade.

Considerations:

- (1) We request that the QCA in their water pricing report, address this issue in its pricing structure recommendation in order to rectify the anomaly which has arisen whereby Water Allocation Holders in the Lower Burdekin Water area are treated differently from other Lower Burdekin Water growers (non- Water Allocation Holders) and holders of Water Allocations outside of the Lower Burdekin Water area.
- (2) Because of Water allocation holders historic supply of water into LBW area and its predecessor South and North Burdekin Water Boards, Water allocation holders ask due consideration in respect of Sunwater charges. LBW has been recognised in regard to the 185000 megalitres Pre-dam water. Water allocation holders have assisted historically and request that Water allocations be converted to Pre-dam flow as it was prior to Dam construction and water boards inception.
- (3) Please acknowledge receipt and keep us informed as to progress.

Dated this 5 day of March 2019.

We the undersigned represent Water Allocation Holders and are recognised as such by LBW as in a meeting notice for Policy Review dated 2nd August 2018

Signed for and on behalf of Water Allocation Holders.

J.J. Call

Signature:

Print Name: Tom Callow

Signature:	D.M.
Print Name:	Damien Michelin
Signature:	- Agash
Print Name:	Paul Sgarbossa
Signature:	min

Print Name: Rian Swindley