

SUBMISSION TO THE QCA IN
CONNECTION WITH THE IRRIGATION WATER PRICING PATH 2020-2024- CBRWSS

I am the Chairman of the Mid Brisbane Irrigators Inc. (MBRI) which is a voluntary organisation that was formed in 2005 to represent irrigators and riparian landholders in the Wivenhoe to Mount Crosby reach of the Brisbane River. MBRI currently represents around 88% of Allocation Holders by volume in the CBRWSS. I have been a Committee member for 14 years and Chairman since 2011. During this period there have been enormous challenges for farm businesses using irrigation as an essential part of their business. The cost of doing business and using irrigation water from the CBRWSS has risen by anything up to 500% due to the introduction of Part A and Part B charges where no service or benefit is provided for the irrigators who finance all of their own infrastructure and the increases in electricity prices, water restrictions, government changes to flood management procedures for the benefit of Brisbane residents without any consideration for riparian irrigators.

Since late 2017 there has been a better understanding by authorities in the application of the Deemed Contract and significant progress was made with items like the installation of meters, as well as specific warning notifications when flooding is imminent. At the time of construction of the Dams for flood mitigation and town water the only consultations with irrigators led to a Government decision that there would be no charge for the water because irrigators had financed and would maintain all their own infrastructure and the fixed minimal volume of water was easily provided from “natural run of the river” sources.

In 2012 MBRI requested QCA to commission an independent study into the hydrology of the CBRWSS but this request was refused.

In 2018 SLR Consulting were jointly commissioned by Seqwater and MBRI to undertake an independent benefits study to investigate to what extent do the irrigators in the mid-Brisbane zone derive hydrologic benefit from the existence and operation of the storages Wivenhoe and Somerset dams.

The answer to that question is conclusively summarised in the SLR report as follows:

using the existing department’s IQQM model (including its key assumptions, limitations and extended to include the recent driest period of record), Wivenhoe and Somerset Dams (and the associated operational and entitlements) provide Central Brisbane Irrigators with no significant change to modelled hydrologic benefit, when compared to the predicted access under a hypothetical scenario where irrigators were able to take water from natural river flows and where there were no dams and system regulation for urban purposes. The effect of the dams – coupled with the operational and access rules that are applied to irrigators within this supplemented system – effectively quarantine the flows in the river primarily for urban water supply in critically dry periods. This results in less water being available to the irrigators in a very dry period than is predicted to be been available under the natural flow regime in the river in the hypothetical no-dam no-urban water supply scenario.

This conclusion is now the core issue in the Seqwater/MBRI Joint Submission to the QCA of 30th November 2018. MBRI confirm in this submission their commitment to the Joint Submission and seek QCA's cooperation in having a meeting with decision makers at QCA prior to the production of the Draft Report. We ask that the following matters be on the agenda for this meeting:-

- QCA's validation process of the Joint Submission, and the study contained therein.
- In the event that the Joint Submission is validated, is the Draft report effectively the Final report for the CBRWSS?
- The referral notice provides explicit guidance (only for the CBRWSS) to take into account cost allocation reviews for Central Brisbane and allows the fixed price to fall as a result of these reviews. Will QCA advise Government in the Draft Report that there is no further review necessary in view of Seqwater's submissions for QCA consideration, that "no service" means "no charge".

Yours faithfully,

Tom Wilkinson - Chairman MBRI