



4/11/2019

238 Upper Haughton Rd.  
Giru, QLD 4809

**Att. Queensland Competition Authority**

*Re: Queensland Competition Authority – Rural Irrigation Price Review 2020-24 Draft Report*

To whom it may concern,

As a GBA irrigator, I wish to raise my concerns about the lack of evidence and justification used in determining the proposed future pricing outlined in your report; particularly the Giru Benefited Area (GBA). Whilst I acknowledge that the cost of delivering water to us as growers should be reflected in the price we pay, I think that any price increase should be fair, and justified on sound evidence.

The major concern to me is the findings in relation to the natural yield of the existing GBA aquifer, particularly the assumptions relating to:

- Amount of water supplemented by Sun Water from the Haughton Balancing Storage
- System inefficiency factors (losses)
- Usage of this water prior to the GBA zones
- Measurement of environmental flow demands and the effect of fulfilling these obligations on the existing aquifer/system performance

The hydrology study by OD Hydrology outlines that their study is insufficient to base pricing on. Numerous questions have been raised at both stakeholder consultations at the Giru CWA hall and in the Burdekin District Cane Growers (BDCG) submission about these dubious assumptions.

Historical irrigation records on the Haughton River prior to supplementation contradict what the desktop, tightly scoped and evidence lacking hydrology report has put forward. An in-depth study into the aquifer by a qualified geo-hydrologist showing irrevocable evidence is surely necessary for such significant changes to be enacted. I anticipate such a study would address the numerous questions outlined in the BDCG submission.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Cross".

**Andrew Cross**

**MHPF BURDEKIN**

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