

# BURDEKIN DISTRICT CANE GROWERS LIMITED

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13 December 2019

**Attention: Executive Director – Water Markets**

Department of Natural Resources, Mines and Energy  
PO Box 15216  
CITY EAST QLD 4002

By email: [RWMP@dnrme.qld.gov.au](mailto:RWMP@dnrme.qld.gov.au)

Dear Sir/Madam

**Rural Water Management Program – Consultation Paper – September 2019**

Reference is made to the Rural Water Management Program – Consultation Paper.

Burdekin District Cane Growers Limited (**BDCG**) does not support the new policy proposals set out in the consultation paper, namely the proposed water measurement framework, for the reasons set out below.

**Background**

Burdekin District Cane Growers Limited (**BDCG**) has three member organisations:

- Pioneer Cane Growers Organisation Limited (PCGO);
- Kalamia Cane Growers Organisation Limited (KCGO); and
- Invicta Combined Growers Organisation Limited (ICGO).

By way of clarification, BDCG has no affiliation with Canegrowers Queensland.

BDCG was created to enable the three organisations to bargain collectively for their respective members (sugar cane growers) pursuant to section 33(3) of the *Sugar Industry Act 1999*.

BDCG represents approximately 4 million tonnes or 50% of the sugar cane grown in the Burdekin. BDCG is in a unique position in that it only represents growers in the Burdekin, who only supply to Wilmar Sugar.

**Submission**

The comments made in this submission are relevant to the specific circumstances of the Delta and Burdekin Rural Irrigation Area (BRIA) of the Burdekin.

1. Lower Burdekin Water (**LBW**), in the Delta, and SunWater, in the BRIA, monitor the use of water in the Burdekin by various means including monitoring off-takes and bores

to ascertain water levels of the aquifer. Whilst the LBW area is outside of the parameters of the consultation paper, it is relevant that LBW is also monitoring use of water via its 650 off-take outlets in the Burdekin.

2. The Department (**DNRME**) also monitors some 300 bores in the LBW area and some 200 bores in the BRIA, measuring water levels and salinity.
3. Growers in the BRIA (SunWater customers) channel off-takes have existing meters, though it is unlikely that they are compliant with the Australian Standard and requirements of data logging and telemetry. Growers, for payment purposes (volumetric charge), are providing SunWater with usage data on at least a quarterly basis for channel off-takes and yearly in relation to bores.
4. Growers utilise more than one channel off-take or bore to irrigate their farm. For example, a 200 hectare grower in the BRIA has 4 channel off-takes and 2 bores; another 320 hectare grower has 3 channel off-takes and 2 bores. Should the meters not meet the Australian Standard proposed, requiring replacement, the potential cost is likely to be exorbitant. This is prohibitive. Channel off-takes utilise water wheels and fall within the 450 mm to 600 mm category (refer to Attachment 1 of the consultation paper), with a likely cost of at least \$50,000 to convert each channel off-take. For one grower this will impose a cost of at least \$200,000.

Existing meters record water usage. Growers, pursuant to their agreement with SunWater, are obligated to provide meter readings, which provides SunWater with data on water usage. Telemetry or “real-time” data is unlikely to provide growers (water entitlement holders) or the Department with any additional information to warrant the potential cost imposition.

5. Rising groundwater in the BRIA is the subject of the Lower Burdekin Groundwater Strategy Project – Discussion Paper – August 2017, however, the Department has yet to release its socio-economic report in response. Given the seriousness of the issue of rising groundwater, the Department should be encouraging and incentivising growers to utilise their bores to irrigate with groundwater, and not impose additional costs on the use of bores (potential of estimated \$8,000 - \$12,000 per bore) that acts as a disincentive to maintaining and utilising groundwater bores.

It is clearly evident that there is substantive monitoring of water levels and salinity in the Burdekin (both the LBW and BRIA areas). The consultation paper does not provide a meritorious or persuasive argument for change, given potential costs. The data on water usage currently being collected by both existing meters and monitoring of bores, is substantive.

The consultation paper does not consider the grower’s capacity to absorb the potential costs. Growers (irrigators) in the Burdekin are subject to increasing water and electricity costs. For example, the Queensland Competition Authority (refer to Rural Irrigation Price Review 2020-24: apportionment of dam safety upgrade costs) has made a preliminary assessment that water prices will have to increase by between \$10 and \$12 per ML to raise some \$300 million for dam safety upgrade costs for Burdekin Falls Dam (the imposition of which is disputed by growers).

There is a limit on the ability of growers to continue to absorb regulatory costs.

For the reasons set out above BDCG does not believe that the Department should adopt the proposed water measurement framework for the Burdekin.

Yours faithfully

**BURDEKIN DISTRICT CANE GROWERS LTD**

A handwritten signature in blue ink, appearing to read 'Julie Artiach', followed by a long, sweeping horizontal line.

Julie Artiach LL.B.

**MANAGER AND COMPANY SECRETARY**