To: Office of Water, City and Environment Directorate

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## Submission On: Draft Water Resources Environmental Flow Guidelines 2025

The UMCN is a strong and diverse community-based network of individuals, community groups, businesses and organisations (government and non-government) committed to improving natural resource management (NRM) in the upper Murrumbidgee catchment. The UMCN (and its predecessor organisation – the Upper Murrumbidgee Catchment Coordination Committee) has been operating for three decades, in recognition that NRM issues do not stop at State or Council boundaries. The UMCN values knowledge sharing, networking, collaboration and inclusion, and is the regional leader in facilitating communication between the community, NGOs and government agencies.

## General Comment

The UMCN welcomes the opportunity to provide its views on the draft ACT *Water Resources Environmental Flow Guidelines 2025* and acknowledges the importance of these guidelines in supporting evidence-based and sustainable water resource management in the ACT.

## Specific Comments

1.4 Statutory basis for environmental flows in the ACT. Queanbeyan and Molonglo waters (p12)

UMCN acknowledges the Commonwealth rights to the entire waters of the Molonglo and Queanbeyan Rivers under the Seat of Government Acceptance Act, to be managed by the ACT, thus the environmental flow is established for the Queanbeyan River below Googong Dam. While the Molonglo River is currently managed under the NSW Murrumbidgee Unregulated River Water Sharing Plan, the plan's flow-class rules do not include specific environmental release requirements downstream of Captains Flat Dam.

We would support that the replacement NSW water sharing plan include clear minimum environmental flow provisions below the dam to better protect aquatic ecosystems consistent with Basin Plan outcomes and environmental flow objectives. While much of the Upper Molonglo is outside the ACT, we consider there is a need to acknowledge the potential impact of abstractions on the many ecological values of the Upper Molonglo, and this also affects the connectivity to downstream reaches, particularly in dry times. For example, the Molonglo Gorge has aquatic ecological values that are sensitive to very low flows.

We also welcome the acknowledgement of the ecological value of streams flowing into the Molonglo River and Lake Burley Griffin, including the Queanbeyan River downstream of Googong Dam and Jerrabomberra Creek. These waterways are known to support stable populations of platypus, rakali and native fish, are likely to support Murray crayfish, and attract an unusually large diversity and abundance of native birds.

However, the guidelines do not clearly address whether environmental flows for these streams are protected, or whether such protections are absent. This is a significant concern, particularly for the Queanbeyan River downstream of Googong Dam, where river reaches are subject to water abstraction at levels that are not transparent, including within the city of Queanbeyan.

While Googong Dam is operated by the ACT, the protection of environmental flows within NSW waters is a matter for NSW water planning instruments. Clear articulation of environmental flow protections and inter-jurisdictional responsibilities is therefore required to ensure the ecological values of these waterways are adequately safeguarded.

2.1 Long-term ecological objective (p16)

Vegetation objectives – UMCN considers the omission of aquatic flora from the ecological objectives of these guidelines to be an oversight. Recent research, *Macrophytes and other water plants in the Murrumbidgee River, ACT* highlights the lack of information and research on this topic. However, this gap in knowledge should not lessen the ecological importance of aquatic flora. It is acknowledged that some indirect consideration may be given when implementing actions to achieve the (draft) currently listed ecological objectives and outcomes, however, we believe aquatic flora warrants explicit recognition. We recommend the inclusion of aquatic flora as a distinct ecological objective.

Overseas research has identified 26 types of ecosystem services provided by macrophytes. These include important functions such as nutrient cycling, habitat creation, water-cycling, gas production, enhancing water purification and disease control. Evidence also shows that macrophyte diversity enhances the efficiency, stability and resilience of ecosystem functioning and provision of ecosystem.

Including aquatic flora would provide consistency with other jurisdictional policies. For example, the NSW Murrumbidgee Long-Term Water Plan identified an ecological objective of supporting instream productivity through aquatic primary productivity (algae, macrophytes, biofilms, and phytoplankton (with related targets at 5,10,20 years); these in turn drive secondary productivity (zooplankton, macroinvertebrates, fish larvae etc).

This consideration is also relevant for 2.3 Priority ecosystems functions (p18):

- PEF3 – Provide quality in-stream and riparian habitats which does not mention aquatic flora. While much of the upper Murrumbidgee River instream habitat is degraded, opportunities may exist for restoration. We suggest that the last sentence (at least) be amended to read:

  *Quality aquatic and riparian habitats include a diversity of native vegetation species.*

- And PEF 5 – Provide drought refuge for water-dependent species (p20). Under B*iological integrity* we recommend adding:

  *Diverse and abundance intact aquatic flora.*

All the above points to be reflected in Figure 2 (p21).

3. Environmental flow requirements and expected outcomes, 3.1 Water supply ecosystems (pp22-30). We acknowledge the inclusion of some aquatic flora as indicators and targets, however, believe they should be given more prominence and reflected in long-term ecological objectives.

4.1 Risks to meeting environmental water requirements (p31). We recommend that two significant risks – Management of Snowy Hydro scheme and Flows from Tantangara Dam - be included in the Executive Summary. The Executive Summary is likely to be the more widely read section of the document by community members, and it is important that these risks are clearly communicated. Recent community surveys show that the broader community has limited understanding of the regulatory, policy and management complexities of the upper Murrumbidgee catchment and its rivers.

In addition, there should be acknowledgement that any environmental flows in the Murrumbidgee River leaving the ACT are not permanently and fully protected from extraction, despite ACT and NSW obligations under the MDBA to protect environmental flows.

We also suggest that, if not included as a formal risk, they should at least recognise factors in NSW that may influence environmental-flow management relevant to this guide. These include:

- NSW requirements for environmental flows, noting that the NSW *Murrumbidgee Long-Term Water Plan, Part Murrumbidgee Catchment* does not mention the ACT Government as a partner under "risks and constraints in meeting environmental water requirements".
- The current temporary water restrictions in NSW that seek to protect environmental flows, which are ongoing but not permanent instruments.
- The recently released NSW *Murrumbidgee Regional Water Strategy,* which identifies the upper Murrumbidgee as a priority region and outlines actions to improve the river's flow regime.

We thank you again for the opportunity to comment and look forward to seeing the finalised guidelines.

Trixi Madon
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on behalf of the Executive Committee

19 December 2025