Issues Consultation:

Independent Review of the Snowy Water Inquiry Outcomes Implementation Deed

Dear Members of the Independent Review Panel

The Upper Murrumbidgee Catchment Network (UMCN) welcomes this unique opportunity to review the current water management arrangements for our region's Upper Murrumbidgee River.

The Upper Murrumbidgee Catchment Network (UMCN) is a cross-border network comprising individuals and representatives from agencies and groups that are responsible for NRM in the upper Murrumbidgee catchment. The UMCN (and its earlier organisation) have supported the regional NRM community for three decades.

The UMCN shares the diverse voices of land and river communities across the entire Upper Murrumbidgee Catchment (NSW & ACT). These voices include local landcare, waterwatch and community groups, recreational fishers and river users, dryland and irrigation farming, local & territory governments, catchment and water management organisations and research groups.

An important place for thousands of years, the Upper Murrumbidgee provides for

- critical human water for numerous local towns and rural landholders as well as Australia's Capital
- habitat for native plants and wildlife
- recreational benefits, as well as important ongoing connection to cultural and spiritual values
- regional small and mid-scale irrigation and dryland agriculture
- from Wagga downstream supplying water to numerous towns and a large, irrigated agriculture industry before reaching the River Murray

First nations people missing from the current deed

- currently there is no mention of First Nations in the deed or Snowy Water Licence
- First Nations peoples continue to maintain ongoing spiritual and cultural connection to the upper Murrumbidgee River and more broadly across the region. In line with the National Agreement on Closing the Gap, First Nations people should be directly involved in shaping revisions to the deed, recognising an enduring connection to the land and waterways and their future management

The current health of upper Murrumbidgee River is poor and declining

- over the last 20 years, 10's to 100's of days of river closures have occurred each year due to increased human health risks resulting from poor water quality, partly because of reduced flows

- declines or disappearance of native fish including Macquarie perch, trout cod, silver perch and two-spined blackfish because of reduced flows, changed flow patterns and habitat loss due to altered flows

- coarse sand build-up resulting movement barriers and loss of habitat for native fish
- woody weed encroachment / dominance resulting from reduced flows and changed flow patterns which are also changing river form
- in 2019, the upper Murrumbidgee River stopped flowing at the ACT village of Tharwa and water quality was exceedingly poor along the entire upper reach, despite inflows into Tantangara Dam exceeding 40ML/day. Drinking water was trucked into Tharwa for critical human water needs and to support the town's fire-fighting reserve
- a desperate river has seen the development of emergency arrangements to support the release of additional water into the upper Murrumbidgee River from Tantangara Dam. These arrangements were announced in 2023 and were finalised in late 2025 as a short-term response to drought-like conditions to avoid the critical impacts seen by communities along the river in 2019

A rebalance of electricity and downstream water demands is needed

- we recognise the array of legitimate demands and uses of the Upper Murrumbidgee water resource, however, the current arrangements create a serious imbalance in how water is shared in this reach
- Upper Murrumbidgee River health is often a second consideration to that of electricity production and regulated water consumption further downstream. This is reflected in the river's continuing and deteriorating poor health and the minimal community involvement in its management
- in contrast, Tumut River flows are unseasonally high (bankfull) each year for months as upper Murrumbidgee inflows are diverted to the Tumut to generate electricity and supply downstream water demands
- pumped hydro creates an opportunity to re-balance flow volumes and patterns between the upper Murrumbidgee and Tumut rivers, with potentially little or no effect on electricity production or downstream water resource availability

Snowy Hydro 2.0 will change the water / electricity production dynamic

- it is unclear how water availability and water quality for the Upper Murrumbidgee might change once Snowy Hydro 2.0 comes online. Communities along the upper Murrumbidgee do not appear to have been informed of how operations might change. The community needs to understand what changes are likely to occur and how those changes might affect future water deliveries

- any review of deed arrangements to support environmental releases should consider at least three scenarios—

    1. recent/current;
    2. post deed review operations; and
    3. operations under Snowy Hydro 2.0 and beyond

Delivered water volumes need to be increased and flow patterns improved

- over the last decades, on average only 3-8% of total average annual in-flow volumes have been passed through this reach, in dry years as little as 1% was delivered – current and historic river health show this is inadequate
- to improve the recovery of the river, at least 30% of average annual inflows should be made available to support environmental releases, long term this will then improve river health
- future environmental water availability can't be set-and-forget, arrangements need to allow for increasing climate variability and the ability to adapt and respond to extreme events
- flow deliveries should attempt to follow patterns (water volumes, timing, duration and frequency) that reflect the evolutionary needs of the aquatic ecosystems that depend on these flows
- ensure that flow patterns between jurisdictions (NSW and ACT) are identical to avoid 'administrative' discrepancies for aquatic wildlife when water flows from state to territory to state. This may require alignment of Long-Term Watering Plans, environmental watering requirements, flow protections and operational management between the ACT and NSW

Current infrastructure limits deliverability

- the current outflow regulator on Tantangara for releases into the upper Murrumbidgee limits the total amount of water that can be released, when it can be released, is dependent on Tantangara total storage levels and often requires staff to be onsite. New arrangements should consider modifications to allow for replacement or upgrade of the regulator to allow the capacity to deliver flows when required and enable remote operation of the outlet
- road crossings, bridges and other downstream structures may hamper the ability to deliver increased flows throughout this reach and limit the ability of native fish to move freely along the river. Consider evaluating the identification, modification and or replacement of these structures to support increased flows and improved fish movement

Governance arrangements and missing decision makers

- respectfully, the current SWIOID, developed before the National Water Initiative, Water Act and Basin Plan were developed, falls well short of the principles, objectives and intent of modern water policy in Australia and needs to be contemporised

- it may be possible to contemporise a future/revised SWIOID by having these new arrangements linked to, or made a part of modern water management frameworks such as the Commonwealth Water Act
- we agree the ACT Government should be included as partner in the Deed agreement. ACT communities have a direct stake in the river, its water and its health. ACT communities and the ACT Government actively manage all aspects of the water resource, including river restoration, species conservation and water quality management as the river flows across the border into NSW
- we agree that First Nations people have not been recognised in current arrangements. First Nations people maintain an ongoing spiritual and cultural connection to these places, bring a wealth of knowledge and should be active participants in these decision-making processes

Flexible environmental flow planning, management and protection

- it is unclear why environmental water allocations for the upper Murrumbidgee remain coupled to western river allocations. This seems to be a legacy of historic water recovery processes. Notwithstanding some losses, water released from Tantangara into the upper Murrumbidgee becomes available for re-use upon reaching Burrinjuck Dam
- current arrangements require planning for environmental water needs to be supplied to Snowy Hydro Ltd up to 12 months in advance. This long lead time locks environmental water managers into delivery arrangements that prevent flexibility, or adaptability to changing seasonal conditions. Revised arrangements should allow water managers the ability to respond and shape flow deliveries in real-time and in context with local climatic conditions (drying or rainfall events) and or other delivery opportunities (water released for other purposes)
- there are currently no carryover provisions for environmental water. Providing carryover would enable water managers to adjust to conditions, provide greater flexibility to manage across and between seasons, particularly if conditions become unexpectedly extremely dry
- current environmental flow protection provisions are ‘one-off’. Future arrangements should ensure that environmental flows are *legally protected*, in both NSW and the ACT, the protection process is systematised (or automated rather than ‘by announcement) and communicated with all water users consistently and effectively

Increase transparency of ‘types’ of water being delivered

- there is currently little transparency of the different types of water being released from Tantangara which makes it difficult to know what water is being released when or why
- consider the use and application of water definitions used for other NSW rivers: conveyance (to maintain water deliverability), critical human water needs, basic river functions, legally abstractable water, environmental flows, planned flood releases (pre-releases), floods (overtopping) etc.

Transparent and real-time water information is crucial

Make basic in-flow and outflow data available

- there is currently no requirement to identify and make available basic near real-time river flow data or information on water transfers from Tantangara. New arrangements should provide for new / additional river gauges to:

    1. account for *all* in-flows into the Tantangara storage;
    2. account for *releases* from Tantangara, immediately downstream of the Tantangara storage; and to
    3. increase transparency of *diversions* out of Tantangara - i.e., Goodradigbee Aqueduct, Eucumbene tunnel;

Improve accessibility of near real-time flow data

- technical know-how is currently required to detect, interrogate, then obtain information on real-time river flows which is unreasonable for an average community member
- reliable *near real-time* information on *total* Upper Murrumbidgee inflows and *actual* Tantangara Dam releases is not publicly available, this makes it difficult to know if release triggers are being met and when releases are likely to occur
- the difficulty in obtaining, or the absence of this information undermines trust in the water license holder and government water management agencies

Transparent and community-centred decision making

- currently there is very little opportunity to know how *any* and *all* water in this reach is managed, who is involved in decision making, when these decisions occur and how these actions are monitored
- there is a vibrant, active and available community across the catchment that is regularly involved in traditional cultural practices as well as riparian, land, pest plant & animal management
- the community is ready to be involved if agencies and organisations open up opportunities to improve management through access to on-ground traditional and western knowledge along the entire reach. Environmental Water Advisory Groups—which link environmental water managers, First Nations people, community groups, and technical experts—operate across other NSW valleys.

Monitoring, evaluation and review – maintain independence

- awareness of the current dire state of the Upper Murrumbidgee has been driven by local community voices. The current SWIOID makes passing mention of monitoring and attributes responsibility for monitoring, however, there is no reliable or effective river condition, ecological or flow monitoring, outside of work done by not-for-profit and community groups

- we recognise and support the Commonwealth investment in the Restoring the upper Murrumbidgee River Program, noting this program is short-term and would provide a pathway into more enduring monitoring arrangements
- we strongly support the establishment of enduring monitoring arrangements that are well-funded, statistically robust, regular and systematic. Monitoring themes could include—flows and hydrology; river geomorphology; fish; mammals; plants and aquatic vegetation and people.
- active participation of First Nations in monitoring design should be incorporated alongside the use of western knowledge
- enduring ecological and flow monitoring arrangements, including funding and design, should be *embedded in licence / operating conditions* and *reviewed independently*
- evaluation and review of the revised deed (or other arrangements) must be regular (at least 5 years), be independent and allow for local community participation

Kind regards

Terry Korodaj

Chair

Upper Murrumbidgee Catchment Network

20 February 2026