To: BPRSubmissions@mdba.gov.au

Submission On: Murray-Darling Basin Plan Review 2026

Discussion Paper

The Upper Murrumbidgee Catchment Network (UMCN) welcomes the opportunity to provide our views on the above discussion paper.

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.

The Upper Murrumbidgee Catchment Network supports the overall direction of the issues outlined in the Murray–Darling Basin Plan Review Discussion Paper.

While the Discussion Paper acknowledges some matters relevant to the Upper Murrumbidgee River, this treatment remains insufficient. The region has historically been a 'forgotten' part of the Basin, and the current review continues to under-represent the scale and significance of the issues affecting this part of the system.

However, this region is not forgotten by its communities. The Upper Murrumbidgee catchment is unique in that unlike anywhere else in the Basin, it includes the ACT (a large urban centre) which is wholly situated within the Murrumbidgee River Catchment. ACT's current population of 464,601 is projected to increase to 589,000 by 2041; with surrounding regional areas also expecting population growth. This means a population in the Upper Murrumbidgee of 717,079 in the next 20 years compared to 112,849 for the rest of the Murrumbidgee region. This must be the largest growing population area in the Basin. The ACT both relies on NSW for water entering the ACT and is increasingly being considered part of the solution to supply water to neighbouring NSW towns. These changes will increase pressure on ACT water supply, and therefore the increased likelihood on reliance on the Upper Murrumbidgee for critical human water needs into the future.

In 2024-2025 the ACT had the fastest growing economy of any state or territory in Australia. The Upper Murrumbidgee is also central to the nation's renewable energy supplies.

The Upper Murrumbidgee is important not only to the Basin but also the nation.

UMCN strongly recommends that the revised Murray–Darling Basin Plan more clearly and effectively address the needs of the Upper Murrumbidgee region.

Comments on the Discussion Paper

Evidence and Issues (p.13; pp.17, 26, 47)

The Basin Plan is failing to provide any effective support to improve the environmental condition of the Upper Murrumbidgee River. This reach of the river is locally known as 'The Forgotten River'. Over the last few years, the MDBA has met with and heard from local communities along the Upper Murrumbidgee River about the river's poor health. This reach forms part of the headwaters for one of the largest irrigation districts in the Murray-Darling Basin, yet this part of the river, its communities the plants and creatures that rely on it are administratively absent from the Basin Plan. Forgotten.

Box 2.2 (2025 Basin Evaluation summary, p13) does not reflect the issues faced in the Upper Murrumbidgee. Priorities identified for the northern Basin—such as improving river connectivity, water quality, and protection of critical human water needs—are equally relevant to this region. The Upper Murrumbidgee gets a passing mention at the very end of the Review Discussion Paper for some monitoring. Monitoring is not enough and it will be too late. The revised Plan must explicitly recognise and address improved flow volumes, effective flow patterns, connectivity, water quality and cross-jurisdictional coordination for the Upper Murrumbidgee River.

Environmental degradation of the Upper Murrumbidgee has been captured in a recent NSW Legislative Assembly inquiry report *Impacts of the Water Amendment (Restoring Our Rivers) Act 2023 on NSW regional communities* (released 28 April 2026). UMCN provided a submission and appeared before the inquiry (link to transcript with Dr Fiona Dyer). The UMCN's submission and the inquiry transcript provide detailed insights into the challenges faced by the Upper Murrumbidgee. The UMCN notes the short timeframe since legislative change and the early stage of government-funded activities have made it too soon to assess impacts in the Upper Murrumbidgee. This important context was not reflected in the final report, further illustrating the region's ongoing struggle for visibility.

Section 3 – Sustainable Diversion Limits not working for the Upper Murrumbidgee

The discussion paper is correct when it states that Murrumbidgee SDL settings are not working. The Upper Murrumbidgee River provides an extreme example of how poor the current settings are with

this reach being in almost continual drought conditions since 2018. Not only are the SDL's not supporting a return to improved river health, but the opacity of the water management arrangements with the Snowy Water Licence, and the lack of meaningful influence by the Basin Plan / Water Act mean there is no effective mechanism to alter the current trajectory of poor river health.

It could be argued the unnaturally low flows in the Upper Murrumbidgee are not driven by abstraction per se, but by a diversion to create energy. Therefore, it could be argued the SDL for the Murrumbidgee is correct because overall the Ecologically Sustainable Level of Take has been met. Though seemingly valid on paper or in a river model, this approach to validating water diversion does not reflect the reality in this ~300km stretch of the river that continues to be starved of water.

Section 4.5.3 Enhance First Nations partnerships in environmental water management

The UMCN strongly supports the Basin Plan as a necessary step toward closing the persistent gaps in recognising and accounting for First Nations peoples' rights and interests in water management.

Section 7 – Macquarie perch in the Upper Murrumbidgee need flows to avoid extinction

We agree that native fish are disappearing from our rivers – fish are wholly dependent on water to live.

A look at the plight of the Macquarie perch in the Upper Murrumbidgee, shows this species continues to suffer because of drastically reduced flow volumes (between 90 to 99% of all Upper Murrumbidgee flows are diverted from Tantangara Dam and into the Tumut River). The flow patterns in this reach are so heavily altered due to low volumes that Macquarie perch are losing breeding habitat and cannot move / migrate between river reaches. Macquarie perch will potentially become functionally extinct in this reach if the flow regime is not improved.

A lack of seasonal base flows is placing the river, Macquarie perch and other species such as Galaxiids at risk due to water quality declines (dissolved oxygen/algal blooms) especially in the face of a drying climate. In January 2026 the upper most sections of the river below the dam saw Galaxiids die due to low oxygen. In the last two years an extended algal bloom was seen on the river, including as recently as March 2026. This should not occur on an upland stream and is a red flag indicating river health decline.

UMCN would like to emphasise that improving the health of the river will also assist many other threatened native species that rely on water including:

- Fish – Trout Cod, Two-spined Blackfish
- Frogs – Northern Corroboree, Alpine Tree, Green and Golden Bell
- Birds – including migratory waders that are losing suitable habitat throughout the East Asian - Australasian Flyway – Common Greenshank, Curlew Sandpiper, Latham's Snipe

Section 9 – Critical Human Water Needs not effectively being met

Townships along the Upper Murrumbidgee are currently experiencing difficulties meeting current critical human water needs (CHWN) due to the lack of flows being released into the Upper Murrumbidgee River. Ageing infrastructure is an issue for some towns. However, basic daily flow requirements to meet CHWN obligations appear to be unmet because of no, or very low releases from Tantangara Dam. The recently implemented Drought Operating Framework appears to be using held Commonwealth Environmental Water to meet some of those town demands.

During the Region's 2019-20 bush fires, an absence of effective flows and drying river pools meant that fire-fighting resources could not utilise water from the Upper Murrumbidgee River in January 2020. This is despite the Tumut River (which receives over 90% of the Upper Murrumbidgee's Flows) experiencing almost bank-full conditions in early January of that year.

Context for the Upper Murrumbidgee

The poor condition of the Upper Murrumbidgee has been raised by community, including UMCN, and stakeholders for many years and is only recently receiving some overdue recognition from governments.

Key recent developments include:

- ***Water Amendment (Restoring Our Rivers) Act 2023*** This legislation clarifies the status of the Upper Murrumbidgee within the *Water Act 2007*. However, Snowy Hydro operations under the Snowy Water Licence continue to take precedence over Basin Plan objectives. This essentially means the Basin Plan doesn't apply for the Upper Murrumbidgee River.
- **Commonwealth Government commitments** These include the SWIOID review (currently underway), funding for the Restoring the Upper Murrumbidgee Program, implementation of the Drought Operating Framework (already triggered several times), and the MDBA's belated program to install Hydrologic Indicator Sites in the region.
- **NSW Murrumbidgee Regional Water Strategy** (December 2025) The strategy identifies the Upper Murrumbidgee as one of four priorities —an important shift that acknowledges the lack of historical action and the degraded state of the river.

UMCN has consistently highlighted the key issues affecting this region, including cross-jurisdictional challenges. While MDBA's powers appear to currently be limited, the revised Basin Plan must better capture the needs of the Upper Murrumbidgee and clearly outline what MDBA can do—or

influence—to improve outcomes. The 2023 legislative amendment confirming the region's inclusion in the Basin strengthens MDBA's obligation to take a more proactive role, including in relation to Snowy Hydro operations. The MDBA can be playing a much stronger role in improving the environmental and social values of the Upper Murrumbidgee River.

Jurisdictional Impacts

Ongoing jurisdictional inconsistencies continue to hinder effective management. MDBA oversight could help address issues such as:

- NSW environmental flow requirements - the NSW Murrumbidgee Long-Term Water Plan does not list the ACT Government as a partner under "risks and constraints in meeting environmental water requirements" yet the ACT government acknowledges under their Environmental Flow Guidelines that the ACT has responsibility to protect environmental flows within its borders. Once water passes beyond the ACT, responsibility for managing and protecting flows rests with the relevant NSW water sharing plan. UMCN draws to your attention that temporary NSW water restrictions on extraction intended to protect environmental flows from Tantangara Dam were only introduced in mid-2025; they remain temporary rather than permanent arrangements.

To genuinely improve flows and environmental outcomes in the Upper Murrumbidgee, future management arrangements must align and integrate. This means the Basin Plan, the SWIOID review and its outcomes, the Snowy Water Licence, and NSW and ACT water plans must be integrated with one another. Current governance and operating arrangements are not delivering acceptable outcomes for this region.

Other Priorities

Catchment Management

UMCN emphasises the need for integrated catchment management alongside adequate environmental watering. Climate impacts do not respect administrative boundaries, and effective responses require coordinated, catchment-scale approaches that integrate land, water, and biodiversity management across jurisdictions.

Implementation and Community Involvement

UMCN highlights the importance of genuine community participation. Effective water management and climate adaptation rely on informed, engaged communities working alongside government, industry, and regional stakeholders. The revised Basin Plan should embed mechanisms that support ongoing community participation, knowledge sharing, and locally driven solutions.

The important role that non-government organisations have in engaging and educating communities about the vast and complicated world of water management are crucial. Greater emphasis and incentives for jurisdictions to work collaboratively with NGOs and community groups in delivering programs of work under the basin plan should be strengthened.

Currently, NGO's deliver a huge number of programs of work to improve catchment and water health, often on small and ad-hoc budgets, such as one-off grant funding, or funding subject to approval on an annual basis. Providing more funding certainty to NGOs and community groups through longer term funding agreements, partnerships and innovative delivery models should be emphasised in the plan.

Improving transparency, accountability and monitoring

UMCN highlights the importance of transparency and accountability to ensure that community confidence is assured and outcomes are met. Effective water management and climate adaptation will increasingly rely on an adaptive management approach, information based decision-making and responding to ecological signals. Transparency, accountability and monitoring of water flows and deliveries are currently lacking in the upper Murrumbidgee.

Summary of Recommendations

UMCN recommends that the revised Basin Plan prioritise:

- Proper and balanced focus on the Upper Murrumbidgee
- Improved mechanisms to manage the unique cross-jurisdictional challenges in the Upper Murrumbidgee
- Integrated, cross-jurisdictional catchment management
- Adaptive and flexible approaches to climate impacts
- Addressing regulatory and economic barriers to implementation
- Strong and ongoing community participation
- Improve transparency, accountability and monitoring

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Chair

1 May 2026