Upper Murrumbidgee Catchment Network
UMCN

UMCN Submission: Draft Report: Independent Review of the Snowy Water Inquiry Outcomes Implementation Deed (SWIOID)

(*Submitted via online survey form. Numbering reflects survey questions and responses only*)

16. Overall, what is your view of the proposed package of reforms?

Very positive.

17. Please explain your answer. UMCN strongly supports the Panel's proposed reforms as a complete package, not a selection of ideas to be cherry-picked. Government should adopt all recommendations together, as the Panel intended, rather than implementing only the cheapest or easiest elements.

The UMCN supports the IRP Panel's approach to use a combination of SMRIF plus Snowy RAR (Required Annual Release) to deliver environmental flows to the Upper Murrumbidgee.

One governance issue that requires further attention are the current arrangements around environmental allocations (SMRIF and SRIF). The UMCN notes this Review did not appear to consider in detail the current specific arrangements relating to SMRIF or SRIF, its allocation, use and management. The current approach for environmental water allocation taken by NSW results in climatic misalignment, whereby a forward year's water allocation is based on a previous year's conditions. This approach perversely results in larger environmental allocations being made in very dry years and very low allocations being made in very wet years. This doesn't make ecological sense and provides a dilemma for water managers.

If RAR is used in the Upper Murrumbidgee and is made available in-line with climatic conditions, the current perverse allocation model for SMRIF may be less problematic. However, this water allocation approach should be reviewed when considering the other Montane Rivers including the Snowy River - for both SMRIF and SRIF.

18. Question: To what extent do you think the proposed package of reforms will achieve the Deed review objective to modernise water management in the Snowy Scheme and improve the health of the upper Murrumbidgee by:

- aligning with national water reforms
- supporting sustainable hydro operations
- adapting to changing conditions, and
- enhancing environmental outcomes while balancing system and downstream needs.

Strongly agree.

19. Please explain why. Overall, the proposed package is well placed to achieve all four objectives, because it addresses the root causes of the river's decline rather than just the symptoms.

The SWIOID Review does not appear to have adequately discussed Basin Plan settings and how they fit for the Upper Murrumbidgee. The UMCN would like to see stronger ties to the Basin Plan. Some aspects of Basin Plan elements don't seem to be applied in the Upper Murrumbidgee reach.

For example, **the current Murrumbidgee SDL would fail if measured upstream of Burrinjuck Dam.**

The UMCN would like to draw the IRP's attention to the MDBA's Submission on the SWIOID Review (Feb 2026) and the MDBA's admission that the 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 and an annual drought since the 1960's. Not only is the SDL 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 means for this river reach there is no effective contemporary 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 – however the SDL reconciliation point is at Balranald, thousands of river kilometres away from the drought-induced Upper Murrumbidgee. There needs to be a more effective way for the MDBA / Basin Plan to positively influence the condition of this river reach.

20. Do you have any major concerns with the overall direction of the recommendations?Broader Upper Murrumbidgee catchment seems to be 'missed' by the Basin Plan

An additional example of the Basin Plan missing in action is the management of the myriad tributaries beyond the Tantangara sub-catchment. Some of these tributaries include the Numeralla, Bredbo, Queanbeyan and Yass waterways. Oversight should consider water (i.e., level of take, minimum flow rules, environmental flow protection etc) as well as broader catchment issues (e.g., ground cover, soil erosion etc.).

Connect the entire river by calling CEW direct from Tantangara Dam

Another alternative to the use of RAR or water buy-backs would be to use existing Commonwealth Environmental Water holdings (CEW) and calling this water direct from

Tantangara. This could be for a targeted Upper Murrumbidgee objective, or for a whole-of-Murrumbidgee watering action.

Specific provisions were negotiated ahead of the Basin Plan to use environmental water in a 'clever way' both to secure reliability of consumptive water holdings and to reduce increased buy-backs. These provisions include calling on environmental water *from a specific storage* (in this case Tantangara Dam) to a location (Burrinjuck), *accounting for incremental losses* (how much water is 'lost' between Tantangara and Burrinjuck) and finally *re-crediting environmental return flows* to be used downstream of Burrinjuck.

So essentially the CEWH could request a watering action using CEW to achieve outcomes for entire the length of the Murrumbidgee, starting at the Upper Murrumbidgee's highest reach with a release from Tantangara. The administrative provisions already exist in a policy tool called Pre-requisite Policy Measures. Recent amendments to the Unregulated Murrumbidgee Water Sharing Plan provide protection of environmental water from Tantangara to Burrinjuck.

Environmental Outcomes:

Question: To what extent do you support the proposed approach to increase environmental flows in the Upper Murrumbidgee equivalent to a long-term average annual target of 30% (87 GL equivalent)? (Chapter 4)

Strongly support.

23. Please explain why.

30% of average annual inflows should be delivered now – there is no need for staging.

30% is still required regardless of the current delivery constraints with the dam outlet.

UMCN strongly supports the proposed increase to 30% (87 GL) of average annual inflow, and we support the Panel's recommended adaptive approach to delivering it. As the IRP points out – this was the intended required flow volume in the original 2002 Deed and was made lower due to an administrative error. 30% is accepted broadly across the scientific literature as the minimum required for a healthy river. Further, the UMCN would like to also emphasise that 30% is the minimum required to prevent further decline, not an upper limit to be traded away through equivalents or offsets.

The UMCN also supports delivering the full 30% immediately, rather than only the staged 23% first. There is no need to deliver a lower volume of water, 30% is still required regardless of the current delivery constraints with the dam outlet.

The UMCN strongly advises re-framing of ‘flow targets’ to ‘flow requirements’. These settings should not be aspirational; these are basic river needs.

Further, this volume of water is needed now for climate-responsive river management, to support the whole system through drought, and to begin the river's recovery – a process that

takes time before results become visible. Every year of delay pushes effective recovery further away.

24. To what extent do you support implementing enhanced adaptive management of environmental water, as described in the report, in the upper Murrumbidgee and Snowy rivers to improve environmental outcomes and minimise impacts on electricity generation? (Chapter 4)

Strongly support.

25. Please explain why. The Panel's technical modelling and expert analysis show that adaptive, event-responsive management is what allows the river to receive the water it needs while keeping the impact on electricity generation negligible.

Releasing water in line with rainfall and tributary flows, and timing it around critical energy events rather than in conflict with them, means environmental outcomes and energy reliability aren't competing goals, they're both achievable under the same framework. This is a well-evidenced, low-risk way to deliver real environmental benefit without unnecessary cost to the grid.

Adaptive management of environmental releases is an approach widely used successfully across other Murray-Darling Basin rivers, including the Murrumbidgee downstream of Burrinjuck. UMCN supports this approach being locked in as a fundamental part of the new Deed, not treated as optional or discretionary

Infrastructure Upgrades:

Question: To what extent do you agree upgrading Tantangara Dam outlet is required to enhance environmental outcomes in the upper Murrumbidgee River, and that within two years from the Panel's Final Review Report, a feasibility study should be completed?

Strongly agree.

27. Please explain why. The capacity to deliver flushing flows from Tantangara at higher volumetric rates is critical and not optional. It is not dissimilar to the flow needs for the Snowy River, now supported by Jindabyne Dam upgrade to pass higher release volumes.

Flushing flows are crucial to mobilising and moving sediment that has collected in all the river pools immediately below Tantangara over the last 60 years. These flows will cue native fish migration and breeding doesn't happen now which is decimating fish populations. Higher flows will also drown out natural barriers which will help native fish to migrate between different parts of the river and support genetic mixing.

The Panel's own analysis is clear that without upgrading the Tantangara Dam outlet valve, the river cannot flush out sediment and stay healthy. The current outlet is limited to 1,500 ML/day, well short of what's needed to move accumulated sediment and restore the river's channel. Higher flow rates can only be achieved when dam levels are high.

The UCMN supports the recommendation for an Independent Study to determine potential solutions to deliver flushing / channel maintenance flows from Tantangara Dam. As per the IRP's Recommendation, the UCMN also recognises that Snowy Hydro's current corporate settings – predominant energy generation drivers, revenue-based senior staff performance incentives – may make it difficult for Snowy Hydro to provide an un-biased assessment of initiatives which allow more water to be released into the Upper Murrumbigdee.

Higher flushing flows are needed right now. This river can't afford to wait. We ask the panel to recommend current maximum flows (1,500 Ml/d) be supplemented with top-ups from novel methods – immediately. We call for relevant independent specialists (engineers, hydrologists, fish ecologists etc) to be engaged in developing novel short-term solutions to supplement the current flow limit. For example, pumping, siphons etc.

Environmental flow volume alone won't fix the river. In the longer term, without this upgrade, this river is capped at partial recovery indefinitely, no matter how much the flow target improves. A two-year feasibility study is a reasonable first step, but it shouldn't be used as an excuse to delay the upgrade itself. The UMCN would like to see the study tied to a clear commitment to proceed with the upgrade (or alternative solution) based on its findings, not treated as an open-ended option.

In addition to the above, the UMCN notes there may be alternative solutions to achieving flushing / channel maintenance flows beyond just 'enlarging the outlet'. Other options could include pumping, over-dam siphons and controlled spills (see below). It may be useful to broaden the suite of potential solutions beyond modifying the existing outlet to achieve the outcomes being sought.

Investigate controlled spills to deliver flushing flows

One alternative to achieve the required flows would be a controlled environmental spill release. Rather than relying solely on outlet capacity, Tantangara Dam would be held at a higher operating level (around 80–90% of full supply level) through a seasonal fill window of roughly March to September, well above its historical average of only 18–23% full. Holding the dam higher increases the likelihood that wet-season tributary inflows will push water over the dam's existing, ungated spillway, producing a controlled environmental spill release well in excess of the outlet's 1,500 ML/day limit and capable of matching the channel maintenance flow the river needs.

Spilled volumes would be accounted as part of the Required Annual Release with losses accounted to an environmental water entitlement. As similar approach has been explored at Hume Dam by the MDBA through the Enhanced Environmental Water Delivery arrangement. Because it uses existing infrastructure, this approach could be operationalised immediately. This would deliver channel maintenance / flushing flows in wet years till an outlet upgrade becomes operational.

Releases could be controlled through a combination of operating the existing current outlet and or the Eucumbene tunnel. Operation of the Talbingo tunnel could be used once Snowy 2.0 becomes operational.

Some consideration may need to be given managing the risk of spread of introduced red-fin and EHNV as a result of Snowy 2.0 connection to Talbingo.

Snowy River

28. To what extent do you agree that the effectiveness of the existing Snowy River Increased Flows (SRIF) be subject to a thorough, quantitative evaluation for delivering on the original agreed commitment of governments to restore the health of the Snowy River?

Strongly agree.

29. Please explain why. The Snowy River's 212 GL flow target has never been properly delivered, and it's never been clear why. The recommendation around the Snowy River should be stronger on achieving the 28% (294GL) flow requirement. This requirement was developed through the original Snowy Water Enquiry by that expert panel report as the minimum flow required to meet the environmental needs of the Snowy River. The current flows do not appear to effectively support native fish recruitment, mobilise and transport sediment or support estuarine floodplain connectivity.

A thorough, quantitative evaluation is long overdue, and governments made this commitment back in 2002. Communities deserve to know whether it's actually being met.

Mowamba Weir is a clear example of why this matters. Retention of the weir has continued to cut the river down to a trickle despite reviews calling for its removal since 2009. We strongly support decommissioning of Mowamba Weir straight away.

Again, the UMCN strongly advises re-framing of 'flow targets' to 'flow requirements'. These settings should not be aspirational like a target; these are basic river needs and are required. The UMCN supports the IRP's observation that this water was purchased from willing sellers to improve river health and that is how it should be used.

Governance and decision making

30. To what extent do you agree that a new Deed is required to be established between governments to manage Snowy water resources, to improve the health of the upper Murrumbidgee and Snowy rivers? The Panel proposes a new Deed should:*

- establish clear, system-level objectives across environmental, water, energy, cultural and community outcomes

- include all relevant jurisdictions, with the ACT joining as a full participant following agreement on the contribution of the ACT to the arrangement
- define roles, responsibilities and decision-making arrangements across governments
- provide the foundation for coordinated planning, funding, implementation and monitoring.

Strongly agree.

31. Please explain why. A new Deed is essential, and the four elements the Panel has proposed are the right foundation. The current Deed is cumbersome, confusing and penalises innovative improvements that support river health.

Bringing the ACT in as a full participant is long overdue. Canberra relies on this river for drinking water yet has had no formal seat at the table under the current arrangement.

Future governance arrangements must recognise the ACT's Government's voice as an integral part of all future decisions around how this reach of the Upper Murrumbidgee river is managed. This means the ACT must be recognised and treated as an equal decision-maker, not a side-line observer.

Further, defined roles and responsibilities across all governments, and a coordinated foundation for planning, funding, implementation and monitoring, are basic requirements for any agreement managing a river this significant.

The UMCN strongly supports independent development of a future or revised Deed. The UMCN recognises the important role that Snowy Hydro plays in Australia's energy market. The UMCN also recognises that Snowy Hydro has a very strong financial interest in a future Deed, being both an energy wholesaler and retailer. However, we note that Snowy Hydro's current corporate sustainability settings do not adequately reflect environmental, social and governance objectives and we note the imbalanced emphasis of the current Deed. As such, we suggest careful consideration of Snowy Hydro's role in the revision or future development of a Deed to ensure a more balanced approach to how these Montane Rivers are managed into the future.

Current Deed supports low proportional water allocations to the Upper Bidgee

One of the other main reasons that the Upper Murrumbidgee currently misses out on flows, especially in dry years, is the way SMRIF allocations are made under the existing Snowy Water Licence.

When allocations are low, Upper Murrumbidgee allocations are lowered at a *proportionally higher* rate. This is due to the binary on/off nature of aqueduct flows and a reluctance to completely dry out other Snowy Montane rivers. This is a consequence of the way allocation rules in the Snowy Water Licence has been designed.

While the Draft Recommendation report makes some general statements about the need to have more reliable flows in the Upper Murrumbidgee, the report doesn't get to the nub of the issue. This allocation issue should be recognised in this Review Report and asked for this to be resolved through the next 2027 review of the Snowy Water Licence.

32. To what extent do you agree that the new Deed should be written in clear language, supported by appropriate explanatory material, and include:

- measurable ecological performance indicators for the Upper Murrumbidgee and in time the Snowy River
- responsibility for compliance and reporting
- responsibility for independent monitoring, audit and review
- responsibility for transparent public reporting on performance and outcomes.

Strongly support

33. Please explain why. The current Deed is impenetrable for the common person and has clearly been difficult for water professionals to understand and implement. As a product of its time, the current Deed seems to be heavily focussed on supporting Snowy Hydro and as such does not readily reflect modern corporate sustainability objectives - environment, social and governance.

A new Deed should be written so anyone can understand it, not just technical experts, lawyers or even people with tertiary educations. It should clearly state how the river's health will be measured, who's responsible for reporting on it, who checks that reporting is accurate, and how the public gets to see the results.

34. To what extent do you support the proposed governance arrangements to achieve the objectives of the new Deed (Chapter 5) (including decision making and oversight)?

Strongly support

35. Please explain why. The UMCN questions the strength of NSW's commitment to this reform process.

The NSW track record in managing the basic health of this river over the last 30 years is extremely poor. Since 2002, the NSW Government has had many opportunities to implement positive improvements for these Montane Rivers but never quite seems to manage. This is evident right now, as it was the Commonwealth Government that supported recovery of this river through the establishment of the Drought Framework, RUMR Funding and the establishment of the SWIOID Review. This initiative was triggered when NSW allowed this river to virtually run dry in 2019.

A little further back, in 2018, the NSW conducted a review of the Snowy Water Licence. That was 8 years ago. There were 23 Recommendations. Since 2018 only 10 recommendations have been implemented and these were 'administrative'. None of the 13 remaining recommendations that relate to environmental improvements have been implemented. Some changes are being 'trialled' but there is little visibility of action on others.

It looks as if NSW is not able to support the basic health of this river.

The UMCN strongly supports independent and additional oversight, provided by other Governments. The Commonwealth Environmental Water Holder has a national remit - it could readily be brought into oversee the management of all the Montane Rivers and the arrangements within a future Deed.

It is currently difficult to understand if current internal NSW management arrangements are conflicted. The UMCN would like the panel to clarify whether the parts of the NSW agency responsible for managing the Snowy Licence is the same group responsible for implementation of DEED or other environmental management of this river? If so, do existing arrangements provide adequate separation to ensure transparency and accountability in future management of this river? A revised Deed should seek to ensure clear separation of responsibilities within the same Department.

36. To what extent do you think the proposed governance changes will improve transparency and accountability? (Chapter 5)

Improve

37. Please explain why. Based on the draft nature of information supplied this part of the draft Recommendations – it is unclear if there will be improved transparency and accountability.

The UMCN suggests the establishment of Community representation in the design of future management arrangements to support greater insight into the effectiveness, or not, of governance arrangements.

Participation & First Nations Involvement

38. To what extent do you think the recommendations will improve community stewardship in the management of Snowy water resources and improving river health? (Chapter 5, Chapter 6.2)

Significantly improve

39. Please explain why. Communities along the Bidgee are already doing the work such as riparian restoration, erosion control, revegetation, weed management and habitat repair; often with little formal support. The Panel's recommendation to embed community stewardship properly, moving it beyond occasional consultation into real, ongoing roles in planning, delivery

and monitoring, reflects what's already happening on the ground. This matters because local knowledge and long-term presence are things no government agency can replicate.

40. To what extent do you think the recommendations will improve First Nations custodianship in water management in the upper Murrumbidgee and Snowy rivers, consistent with the National Agreement for Closing the Gap (Chapter 6.1)?

Significantly improve

41. Please explain why. The Panel found no First Nations-held water entitlements currently exist in either river system, and no formal decision-making role since 2002.

The proposed custodianship framework, aligned with Closing the Gap commitments, is a meaningful step forward. As the report itself notes, its value depends on whether funding, entitlements, legal authority and real decision-making power actually follow.

Monitoring and accountability

42. To what extent do you think the recommendations support strengthening monitoring, reporting and evaluation of environmental water management? (Chapter 5)

Strongly support

43. Please explain why. Right now, monitoring and accountability focuses on whether paperwork was followed, not whether the river is actually getting healthier. Independent audits, clear public reporting and real oversight are essential if this reform is going to mean anything in practice.

In the short-term (i.e., the first 5 years) monitoring results should focus on the attainment of EWR's

Monitoring for the Upper Murrumbidgee during the first five years should be primarily focussed on Snowy Hydro's attainment of EWR's. For example, independent reporting on which EWR's were attempted, when and how (or not) they were met (including all parameters – volume, frequency, timing and duration).

Detecting an ecological response to improved flows may take years or decades as there has been a 60-year deficit / loss. Recovery will take time.

Ecological monitoring of direct ecological parameters could also be started immediately with a focus to establishing a baseline as the basis for future ecological assessment. However, analysis of ecological change is unlikely to be detected for a number of years.

Basin Plan Monitoring Point for the Upper Murrumbidgee proposed by the MDBA

The UMCN would like to draw the IRP's attention to the MDBA Submission on the IRP report (Feb 2026). In particular, the MDBA's initial SDL assessment findings for the Murrumbidgee relevant to the Upper Murrumbidgee and this SWIOID Review.

In that submission the MDBA proposed adding an Upper Murrumbidgee Basin Plan Monitoring Point to support connectivity, improve transparency and accountability.

The UMCN strongly supports the establishment of this Monitoring Point and believes this could be undertaken immediately. The UMCN suggests the IRP liaise with the ACT Government Office of Water to confirm that Mt McDonald on the Upper Murrumbidgee River would be a suitable site for this Monitoring Point.

44. To what extent do you support establishing a strengthened enforcement framework to support achievement of the new Deed objectives?

Strongly support

45. Please explain why. The UMCN is quite concerned around the current compliance arrangements and supports immediate focus and improvement. Current compliance arrangements around the interface with the Snowy Hydro Scheme and the Upper Murrumbidgee river within NSW, as well as the Commonwealth, are at best confused or not transparent or both.

The IGWC currently has no jurisdiction for these Montane Rivers – despite many of these rivers and ALL the water being considered with the Basin Plan and the Water Act. The mysterious dispensation given to the Snowy Hydro Scheme from being held accountable through the Water Act and or Basin Plan simply doesn't pass the pub test.

A clear role for the Inspector General Water Compliance for these Montane Rivers and the Deed could be established within the context of the Basin Plan.

NRAR should be allowed to play an active role in monitoring and reviewing the operation and compliance of parties in a future Snowy Licence. It is unclear why NRAR does not appear to have jurisdiction from Tantangara itself (at the release point), but NRAR's jurisdiction starts *after* the release point.

Catchment management

46. To what extent do you agree with the proposed recommendation to improve investment and coordination of integrated catchment management across jurisdictions to complement environmental watering? (Chapter 6.5)

Strongly support

47. Please explain why. The Panel is clear that flows alone won't fix the river. Sediment, eroded banks and degraded habitat need to be tackled too, which involves coordinated investment and integrated catchment management across jurisdictions.

Funding and implementation

48. To what extent do you support establishing long-term funding arrangements to deliver the recommendations? (Chapter 7)

Strongly support

49. Please explain why. Current funding runs out in 2029, which is nowhere near enough for a multi-decade recovery. The Panel's proposed hybrid model which combines government funding with an independently set, beneficiary-pays contribution from Snowy Hydro is a sensible, fair approach. Without long-term funding locked in, we risk seeing these recommendations stall once the current investment runs out.

Ironically, every individual water consumer in the ACT is levied a river restoration fee as part of their water bill. Snowy Hydro does not pay anything ($0.00) for the water it diverts from the Upper Murrumbidgee, despite the millions of dollars in revenue it receives each year. Snowy Hydro does not appear to make any financial contribution to rehabilitating the Upper Murrumbidgee river as a result of its diversions, despite the significant degradation its diversions are causing.

The UMCN recognises and strongly supports the IRP's application of the beneficiary-pays principle which requires Snowy Hydro to contribute financially to the repair and restoration of the rivers that are damaged as a result of broader community benefits from energy and farming.

50.To what extent do you agree with the Implementation Roadmap as a framework for timely intervention by governments to improve river health (Chapter 8)?

Strongly support

51. Please explain why. The three-phase timeline gives this reform real structure, but government must commit to all of it, not just the early, easier steps.

As noted above, the UCMN strongly supports direct Community involvement both during the next steps of the Review as well as implementation post Review.

The river needs urgent action; it cannot afford more years of delay. We call on government to commit to a transparent roadmap with defined timelines and milestones, and to implement it with federal and state governments, stakeholders and First Nations all at the table.

Final Reflections

53. Do you have any other comments?

Water buy-backs v's RAR (Required Annual Release)

The UCMN believes the use of RAR (Required Annual Release) to deliver increased volumes is a novel clever solution which has minimal effects on the existing consumptive water pool. The UMCN believes the use of RAR as opposed to alternatives for seeking additional flows will result in a highly effective result with minimal impact, when compared with alternatives.

The UMCN believes the Draft Recommendations might benefit from clearly eliciting the alternatives of achieving increased flow to support improved environmental health in the Upper Murrumbidgee. These options may have included buy-backs of water from the consumptive Murrumbidgee pool and or legislative changes to water sharing plans (Unregulated Murrumbidgee and Regulated Murrumbidgee) to create a designated pool of Planned Environmental Water entitlement to meet flow demands. Either way, the latter changes will have likely affected the consumptive water pool – use of RAR does not.

Recognise the Snowy Hydro Statement of Expectations was modified in December 2024

The draft report references the need for Snowy Hydro's statement of expectations, made by shareholder ministers, to be updated. However, it doesn't seem to have acknowledged that changes were already made to represent a broader range of values in December 2024. This change altered the expectations to "recognise environmental, social and sustainability responsibilities, including the health of the broader river system and downstream water needs…". It is unclear if this change to the Statement of Expectations resulted in any internal change within Snowy Hydro.

The UMCN supports the Panel's proposed additions to the Statement of Expectations and the changes to Executive remuneration to ensure the Statement of Expectations move beyond words, to actions.

The UMCN also supports an approach where Snowy Hydro can demonstrate it actually operates consistently with these expectations and for governments to ensure accountability for Snowy Hydro's behaviours and actions.

Recognise excess Tumut River flows from Upper Murrumbidgee diversions

The review rightly acknowledges the challenge of seeing the Upper Murrumbidgee problem in isolation from other rivers. However, it fails its own test by not explicitly referencing the issues on the Tumut River. The reason the Upper Murrumbidgee has such low flows is that they've been directed west for irrigation – now there is an excess of flows through the Tumut River, which runs at bank full capacity for long stretches of time. This has its own impacts including bank erosion, cold water pollution and limited river amenity.

While the SWIOID Review doesn't need to solve that issue, it should at least reference it. This should also improve understanding for how the scheme works, and that either way the water reaches the Murrumbidgee river, just through a different route.

The UMCN does not accept Snowy Hydro's suggestion of using the Basin Plan's Constraints Management Strategy to fix riverbank damage on the Tumut River caused by Snowy Hydro's releases from Blowering Dam (see SHL's February 2026 submission to the IRP). The Basin Plan's Constraints Management Strategy could rightfully be applied within the Upper Murrumbidgee River to support landholders in improving river crossings to support higher environmental flows with less disruption to local landholders.

Future Snowy 2.0 operational arrangements are unclear

Snowy 2.0 is the biggest change to the scheme since its original construction. It will have direct impacts on the management of Tantangara Dam, the Tumut Development and the scheme more broadly.

However, the draft SWIOID Review Report doesn't grapple with this issue. While it doesn't need to be "solved" now, there should be much better acknowledgment of how the operation of Snowy 2.0 is expected to change the management of the scheme, how water is moved and used broadly within the scheme. This includes the flow on effects of these new operations on the Upper Murrumbidgee and Montane Rivers as a well as other downstream rivers. The UMCN recommends the Draft Recommendations should also flag the need to review the Deed arrangements again once Snowy 2.0 becomes operational.

This is important considering Snowy Hydro's future ambitions of additional pumped hydro schemes being rolled out in the Snowy Mountain and other sites in Australia.

Prioritise and secure environmental water to anticipate climate change forecasts

The UCMN strongly supports the development of a Regional NSW / ACT Growth Strategy.

The draft Recommendations could be improved to recognise the risks to regional water security and river health due to forecast in-flow declines resulting from climate change. The UMCN would support an approach that allocates a proportion of historical water flows to the environment (for the Montane Rivers) as a minimum volume which is maintained into in future despite declining inflows.

Current draft Recommendations do not adequately address projected inflow declines for the Region. Reduced volumes for environmental releases for the Montane Rivers will likely fall below the thresholds required to mobilise sediments and support effective river function. In other words, as climate change bites, the river will lose.

Prioritising and protecting critical human needs and environmental water would align with current Commonwealth (Water Act and Basin Plan) and NSW water legislation. These instruments identify that water allocations should first meet critical human needs and maintain environmental health before commercial uses (e.g. NSW Water Management Act 2000).

Snowy Hydro's current dependence on a 'continuous water supply' to operate its fleet of mostly 'once-through' generators will change once Snowy 2.0 as pumped hydro becomes operational. The same water can be used and re-used. Into the future, as pumped hydro expands through the Snowy Scheme, electricity generation could be supported with less water (the water is re-used), thus reductions to in-flows are likely to have a lesser effect on the pumped hydro fleet.

Maintaining the Upper Murrumbidgee Drought Operating Framework in the interim

The UMCN supports Recommendation 8 which recognises the importance of the Drought Operating Framework continuing to operate till a revised set of arrangements is in place. Though we note the current settings of 50ML/d at Lobbs Hole are inadequate as a minimum threshold and recommend increasing the minimum to 80ML/d. This is critical stop-gap measure that hopefully avoids the catastrophic conditions experienced in 2019.

Development of a Regional Growth Strategy

The UMCN strongly supports the Recommendation 15 for the ACT and NSW to develop a Regional Growth Strategy. This is particularly important in light of increasing settlement population demands on water, environmentally sustainable level of take and forecast climate change.

End.