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SUBMISSION

Improving the Health of the Upper Murrumbidgee: Draft Strategy

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Introduction

New South Wales Irrigators' Council (NSWIC) seeks more clarity on several aspects of the *Improving the Health of the Upper Murrumbidgee: Draft Strategy*, in particular the review of water management settings in the Snowy Water Inquiry Outcomes Implementation Deed (SWIOID) review and the proposed Contingency Reserve to support additional water releases into the Upper Murrumbidgee in drought-like conditions.

NSWIC requests that before proceeding, the Commonwealth, New South Wales and Victorian Governments commit to six principles to guide the review.

Review principles

Snowy Water Inquiry Outcomes Implementation Deed review

The first part of the program relevant to NSWIC is the SWIOID review, for the which we propose four key principles that must be considered in the design and implementation of this program.

1. *The SWIOID review is undertaken in a transparent manner that considers all stakeholders that may be impacted - including irrigators downstream in the Murray and Murrumbidgee valleys.*

As it currently stands, little information is available on the implications of the SWIOID review for downstream communities in the Murrumbidgee and Murray valleys. While the Draft Strategy acknowledges that management of the Upper Murrumbidgee is a shared responsibility between NSW and the ACT, and that increased releases from Tantangara Dam may have possible impacts on downstream water users, it says very little about what those impacts might be.

2. *Proper consultation is conducted with all relevant stakeholders to inform the review's Terms of Reference*

The consultation approach to this program does not include downstream irrigators. While NSWIC acknowledges the importance of working closely with community groups, First Nations Peoples, Government Departments, scientists and environmental groups to deliver the strategy, it also has potential impacts on the security and reliability of water available to irrigators downstream in the Murrumbidgee and Murray valleys. Given that the SWIOID review and contingency water may ultimately impact downstream irrigators, they must be included as key stakeholders in the consultation process.

3. *Guarantee that any water management changes will not affect the reliability nor volume of water entitlements downstream*

NSWIC asks for a guarantee that the contingency reserve and the SWIOID review will not negatively impact the reliability of water allocations downstream. Irrigators are already dealing with the impacts of numerous water recovery programs and need assurance that the *Improving the Health of the Upper Murrumbidgee Strategy* will not further reduce water access.

4. *Ensure that Murray-Darling Basin Plan is adhered to, with the knowledge that any negative impacts would incur compensation to downstream users*



The Draft Strategy acknowledges that there may be ‘possible impacts to downstream users’ from the delivery of additional water from the Tantangara Dam into the Upper Murrumbidgee. The Commonwealth, NSW, ACT and Victorian governments should be aware of their obligations for compensation before amending the SWIOID (Clause 2.2 in the 2013 Intergovernmental Agreement on Implementing Water Reform in the Murray Darling Basin).

Contingency funding for additional river flows

The second part of the program relevant to NSWIC is the contingency funding for additional river flows. On this matter, we suggest two principles are followed.

1. *The Contingency Reserve is not drawn from the Murrumbidgee RAR.*

The source of water for the Contingency Reserve is unclear, as is whether the reserve will impact the Required Annual Releases (RAR) into Blowering Dam via the Tumut power station. NSWIC seeks to know

- a) From which ‘bucket’ the water will be drawn, to increase releases from Tantangara Dam into the Upper Murrumbidgee;
- b) What are the losses when that water flows between the Tantangara and Burrinjuck Dams; and,
- c) What is the status of this water once it has passed into the lower Murrumbidgee, i.e. is it reregulated or shepherded?

NSWIC believes that the Contingency Reserve in principle should be created from existing upper Murrumbidgee water allocations in the RAR and the Snowy Montane Rivers Increased Flows, and not by diminishing water available downstream by reducing the Murrumbidgee RAR. Given that this water will be made available during drought-like conditions when competition for water is greatest, the Government needs to be clear about these details or risk stoking more fears amongst irrigation communities about its impact on water allocations and entitlement reliability.

2. *Options for water recovery within the Upper Murrumbidgee are explored*

As part of Improving the Health of the Upper Murrumbidgee, the Government should consider all options for improving flows in the Upper Murrumbidgee, including water recovery from within the Upper Murrumbidgee, including the ACT.

While we acknowledge the negative impact that water diversion in the Snowy Hydro Scheme has had on the health of the Upper Murrumbidgee, NSWIC asks that the Government considers the possibility of water recovery from within the Upper Murrumbidgee and ensures that it is not downstream NSW water users that ultimately pay the full cost of any future water releases.

Conclusion

The Improving the Health of the Upper Murrumbidgee Strategy will not be equitably delivered unless the above issues are adequately addressed. As it stands, the Draft Agreement is lacking in many key details relating to how the SWIOID review will be managed in a way that does not negatively impact downstream irrigators.



NSWIC also requests more details of the Contingency Reserve for water releases, to ensure that this reserve will have not affect water users in the lower Murrumbidgee and Murary rivers.

NSWIC and our members are available at your convenience, if you have any questions or would like any further information.

Kind regards,

NSW Irrigators' Council.