



Dear Sir/Madam,

Re: Australian River Restoration Centre submission to the Productivity Commission, on the interim report for the Murray-Darling Basin Plan: Implementation review 2023.

We are writing in response to the Productivity Commission's interim report on the Murray-Darling Basin Plan: Implementation Review 2023. This submission is made on behalf of the Australian River Restoration Centre's (ARRC) team, as well as the rivers, wetlands, creeks and billabongs, we work to protect and restore alongside Basin communities.

We looked forward to reading the Interim Report on the implementation of the Murray-Darling Basin Plan, as we spent considerable time preparing our own submission, as well as providing input on several others. Our hopes that the Interim Report would highlight the deteriorating health of the Upper Murrumbidgee River and other Montane rivers impacted by Snowy Hydro have, however, failed to be addressed, in a report that makes no mention of the significant issues we raised in our submission.

In our previous submission, we outlined a glaring gap in the implementation of the Basin Plan and called for it be rectified. The Upper Murrumbidgee River is part of the Murray-Darling Basin, and flows from the Snowy Mountains, through Cooma and Canberra before Burrinjuck Dam, where it becomes part of the Murrumbidgee regulated system. **This 320 km stretch of river has been completely ignored by the Basin Plan reforms and is in severe decline.** The Productivity Commission had the opportunity to highlight this grievous situation and recommend that action be taken.

Although the ARRC submission did get a mention in the Interim Report as being a supporter of the Basin Plan (see boxes 1 and 1.2 on pages 9 and 43 respectively), we feel this has been taken out of context. **We made this statement in relation to what is not being achieved on the upper Murrumbidgee and ask that it be placed in the correct context in the final report.** We have attached our previous submission so that these statements can be read in the full context of the points we were making about the ACT and surrounding region (**Attachment A**).

The Interim Report specifies that: *"Achieving the outcomes of the Murray–Darling Basin Plan (the Basin Plan) depends on the Plan and supporting management activities being informed by a sound knowledge base. The Water Act 2007 (Cth) requires the Basin Plan be developed 'on the basis of the best available scientific knowledge and socio-economic analysis'.*

The Basin Plan requires the best available knowledge, or information, is to be used for:

- *developing water resource plans (WRP)*
- *the application of environmental water*
- *prioritising assets for environmental watering*
- *the assessment of river inflows to manage critical human water needs*
- *monitoring and evaluation.” (page 164)*

On these five points above, for the Upper Murrumbidgee River, we can be confident of the following:

- 1) The NSW Murrumbidgee WRP is not in place, and the ACT WRP is not able to influence any flows it relies on from NSW;
- 2) The application of environmental water in the region is outdated, with no carry-over, no active or adaptive management, and simply not enough to support basic ecological functions;
- 3) Critical Human Water Needs are not prioritised in the Upper Murrumbidgee region, with environmental water used to supplement the city of Cooma’s water supply. It seems that there is no concern for Critical Human Water Needs which rely on flows from NSW to the ACT WRP region via the Upper Murrumbidgee River. Section 7.2 (page 185) states that “*The Basin Plan is required to give critical human water needs the highest priority.*” As a source of Critical Human Water Needs for the ACT and towns such as Cooma, we can say that Critical Human Water Needs are not a high priority. The NSW Water Sharing Plan classifies the Upper Murrumbidgee River as unregulated, almost completely ignoring the 254 GL storage of Tantangara Dam as a future option to provide critical water.
- 4) Monitoring and evaluation are substantially lacking in the Upper Murrumbidgee River, with the only ongoing work conducted by Waterwatch volunteers.

We feel concerned by the Interim Report’s complete failure to mention any of the issues outlined above. The Interim Report mentions the International Association for Public Participation (IAP2 – page 218) as a basis for meaningful engagement. If this is the case, then surely there must be a face-to-face engagement session for the ACT Water Resource Planning Area (and joint NSW Murrumbidgee WRP area). In the last round of consultation, Griffith was the closest location to the Upper Murrumbidgee. Canberra is the largest city in the Murray-Darling Basin, so it seems counter intuitive to not have a single meeting in the nation’s capital. We ask that the IAP2 participation spectrum outlined in Table 9.2 is honoured so that we people from the Upper Murrumbidgee region can meet with the Productivity Commission to listen to our concerns and seek feedback.

As a result of the failure to address the plight of the Upper Murrumbidgee, we are leading a campaign to raise awareness about the river and surrounds. A website called ‘The Forgotten River’ (www.theforgottenriver.au) has been established to share information and provide a focal point for action. We are taking a collaborative and open approach, with

a survey currently open to anyone who cares about the Upper Murrumbidgee to tell us how they believe this river needs to be managed. To date, we have had 900 responses to the [survey](#), and we will be spending the next few months collating and sharing that information widely. We have also been raising awareness via the media, with two recent articles again highlighting our concerns: [Momentum builds for review of environmental water releases from Snowy Hydro Scheme - ABC News](#) and [Social scientist calls on Canberrans to help save the once-mighty Murrumbidgee | Riotact \(the-riotact.com\)](#).

Given there is no face-to-face engagement as part of this Interim Report feedback process, we extend an invite to any Productivity Commission staff, in Canberra or elsewhere, who would like to meet us by the river, hear about the issues it is facing, and learn about the implications for ACT and regional water quality and security. It is your river too, and the Basin Plan is currently not improving it.

We called the website The Forgotten River because the Upper Murrumbidgee continues to be left behind by processes and plans designed to improve river management. With the Interim Report currently not mentioning any of the issues raised in the first round of submissions, we're suggesting the process is, unfortunately, continuing to forget this once mighty river.

Yours sincerely,

Dr Siwan Lovett
Managing Director

27th November 2023

Attachment A - ARRC Submission Basin Plan Review July 2023