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Productivity Commission
Attn: Pragya Giri
E: basin.plan.2023@pc.gov.au

***Re: Submission of comment on the Murray–Darling Basin Plan:
Implementation Review 2023 Interim report***

Dear Sir/Madam.

I am writing on behalf of the Upper Murrumbidgee Demonstration Reach (UMDR) partnership to provide comment on the Murray–Darling Basin Plan: Implementation Review 2023 Interim report. Thankyou very much for an extension of time to provide this submission.

The UMDR is a regional partnership which aims to involve all catchment stakeholders in working together to improve and protect the health of the upper Murrumbidgee River for the benefit of native fish populations and the community.

The upper Murrumbidgee River is iconic- it is the headwaters of Australia’s second longest river, it is home to 9 species of native fish (including natural, self-sustaining populations of Macquarie perch and Murray cod which are both nationally listed threatened species), is culturally significant to the Ngarigo and Ngunnawal peoples, and is relied on by our rural and regional communities for irrigation, recreation and as the source water supply for Cooma (the home of Snowy Hydro) and Canberra (our Nation’s capital). All of these important ecological, social and economic values of the upper Murrumbidgee are underpinned by good river health.

Given the significance of the upper Murrumbidgee River to the Murray-Darling Basin we are very disappointed to see that none of the issues we raised have been included in the interim report.

Our previous submission highlighted the critical need for better water management arrangements to be put in place for the upper Murrumbidgee River to prevent its further decline.

A contributing factor to this is that the upper Murrumbidgee, (as well as the Snowy and the other Montane rivers included in the operations of the Snowy Hydro Scheme) are operated almost entirely for economic and energy purposes, severely impacting river health, Cultural connection and critical human water needs. The impact of the Snowy Scheme sitting outside of water management frameworks such

as the Murray Darling Basin Plan is that the upper Murrumbidgee is classed as 'unregulated' in the NSW Water Sharing Plan. Hence the environmental flows for the upper Murrumbidgee, once released from Tantangara Dam, become part of the available 'unregulated' water source and so are legally able to be extracted by downstream water users. Furthermore, this water can be substituted for Cooma's water supply as there is also ambiguity about whether riparian/baseline flow allocations can be afforded from the environmental flow allocation. Such lack of protection of environmental flows exists nowhere else in Australia. Furthermore, flows have also been reduced with less than 10% of inflows allowed to pass down the river. As such Snowy Hydro Scheme operations have many implications for the management of the upper Murrumbidgee River downstream of Tantangara Dam and are affecting the health of the river.

Such impacts would not be tolerated by communities anywhere else in the Basin and are in contradiction to the objectives the Murray-Darling Basin Plan seeks to achieve.

We reiterate our concern that, unless this is rectified, the river will further decline especially in the face of future increased regional demands on water supply and climate change.

We understand that the Basin Plan cannot be inconsistent with Snowy Hydro operations, as prescribed in the Water Act (2007) and this limits remedial measures which may be included. We also acknowledge that management arrangements are complex, and that there are a number of agencies and mechanisms involved all of which have specific scope and responsibility.

Under these current arrangements the upper Murrumbidgee River is 'falling through the cracks' and the decline of its health will be ongoing and potentially irrevocable if action is not taken.

It is for this reason that we asked that these issues be acknowledged, that the impacts of the current management arrangements be noted and recommendations for improvement (even if beyond the direct remit of the Basin Plan) be included in the Productivity Commission's Review. The lack of acknowledgement of our concerns seems to support our view that the upper Murrumbidgee is indeed being forgotten and left behind when it comes to modern day river management!

Please note that this submission does not necessarily reflect the view of any one of our partners. Please do not hesitate to contact the UMDR if you would like any further information on the contact details above.

Yours sincerely,

Antia Brademann

UMDR Facilitator
27 Nov 2023