



Mrs Vickii Wallace
President, Snowy River Alliance
C/ PO Dalgety, NSW 2628
T: 02 6456 6725
E: wallacevr@snowy.net.au
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Snowy Water Licence Review
Intergovernmental and Strategic Stakeholder Relations
Department of Primary Industries Water
Locked Bag 5123
Parramatta, NSW, 2124

By email to: snowylicence.review@dpi.nsw.gov.au

Dear Reviewer,

10 Year Review of Snowy Water Licence Draft Report – May 2018

The Snowy River Alliance (SRA) is pleased to comment on the draft report of the 10 Year Review of the Snowy Water Licence. We also very much appreciate your efforts and time to consult with stakeholders at the recent meeting which we attended in Cooma.

The SRA is very pleased to note the thoroughness of the draft report, and the detailed summary of issues raised in various submissions including our own.

We would like to highlight a few items raised in the draft report. Specific details of these issues are addressed in the following appendices. We hope that the positive commitments to investigate several issues for possible later implementation will be pursued in a timely manner. Given some of these are continuations of commitments made more than 10 years ago (eg Mowamba investigations) we look forward to speedy completion of the tasks and further consultation on the proposed solutions.

The SRA congratulates the review team for acknowledgement in Section 8 of the draft report that there is a critical need for the NSW Government to continue to oversee water management in the

Snowy Mountains. The absence of any consultative mechanism has proved to be a major frustration for the community. With opportunities to provide constructive input only occurring once in 10 years the community can be forgiven for assuming that the reason for this is to frustrate any attempts to effect change. It is worth noting that the actions which initiated the Snowy River Inquiry started in the 1970's, built up through the 80's, and were fulfilled in the 90's.

Another 20 years have passed since that Inquiry and we still do not have regular flows in the Snowy River at the levels committed to in the SWIOID. The Inquiry recommended 28% flow be restored to the river, and in most years the river receives no more than 15%. This is not what was intended by the partner governments which spent over \$400 million on water savings and recovery.

An open and transparent consultative mechanism must be created which allows ongoing dialogue – not just a once every 10 years flurry of activity. Particularly with the growing impact of climate change, unanticipated events might overtake us, and potentially having to wait another 10 years to act is unrealistic. We are hopeful that the long promised Snowy Advisory Committee will initiate that mechanism, provided it is not restricted in the scope of its activity.

Thank you for the opportunity to provide feedback on the draft report. The SRA is looking forward to continued constructive interaction with the NSW Government and Snowy Hydro Limited in the future.

Yours sincerely

A handwritten signature in grey ink that reads "VWallace". The signature is written in a cursive, flowing style.

Vickii Wallace

President, Snowy River Alliance

Appendix A: Permanent Removal of Mowamba Aqueduct

The Draft report in Proposal 7 recommends that OEH, in partnership with Department of Industry, Snowy Hydro Limited, the SAC and Victorian and Commonwealth governments, will finalise the Mowamba River investigation. This will include:

- evaluating using the Mowamba River as a way to provide environmental water to the Snowy River
- recommending an environmental flow regime for the Snowy River consisting of a combination of releases from Jindabyne Dam and the Mowamba River.

The SRA strongly endorses this proposal. We recognise that the accounting for what would become completely unregulated flows would be complex. As such we would suggest that the MANF of the Mowamba be targeted on an annual basis. Publicly accessed data as to the volume of flow actually achieved in each water year would then allow adjustments in the subsequent year to the required release from Jindabyne Dam of the balance of the SRIF. Publication of a Mowamba Balancing Account would be one way to achieve this in a transparent manner.

Section 9 of the Draft Report proposes an Implementation Plan. The SRA recommends that such a plan have clear and unambiguous commitments that cannot be allowed to lapse for lack of organisational commitment. Unfortunately some previous tasks have not been completed in a timely manner and it is important to have clearly documented requirements which transcend changes of responsibility between departments or staff members over the long term.

Appendix B: Long Term Average Flows

The SRA is very pleased to see a clarification to the SRIF regime which would remove the uncertainty about average flows. In the 16 years since corporatisation there has only been one year in which flows have met the target originally envisaged by the SWIOWD. Some of those years have been drought years but many have not. It is reasonable to assume that in a year in which all entitlements can be delivered then some of the deficits from previous years should be repaid to the Snowy.

It is not reasonable for the benefit of the “bonus” water to be given only to Snowy Hydro. There should be a mechanism which prevents the 212 GL being seen as a cap.

Appendix C. Governance and coordination

The SRA is pleased that the NSW Government is committed to the Snowy Water Initiative and on working to build community confidence in the way the Snowy River and Snowy montane rivers are managed. Community confidence has been eroded over the past few years as actions such as abolition of the Snowy Scientific Committee occurred.

We are concerned however that the draft report states that “the significant water recovery task is now complete”. This implies that there is no intent to secure further allocations of water to increase the security of the SRIF. The SWIOID refers to 28% as the long term flow target, but no reference to this figure appears in the Licence. And it is clear that in normal years the General Security allocations will not be fulfilled. As such it will be a very rare year in which 21% flow is achieved, and there is no prospect of that being delivered as an average figure. In 2019 we expect only around 13% flow to the Snowy and in an average year only around 15%.

We are pleased to hear that OEHL will take on responsibility for environmental flows in the Snowy, but this must be supported by ongoing scientific research. It would be appropriate to formalise the research effort, perhaps in the form of an ongoing trust which could manage the process in the long term.

Appendix D. Snowy Montane Rivers Increased Flows

The SRA appreciates the extensive work undertaken by WCLC and Snowy Hydro to make pragmatic decisions on how specific releases can be best managed. It is a fact however that the releases are in far more remote areas within the scheme, and mostly go unnoticed by the public. The draft report notes in Clause 7.3.3.1 that “In each instance, Snowy Hydro Limited assessed the inflows and engineering of each of the works within each catchment and recommended to the WCLC how and where modifications should be made”.

While this approach may be effective, it fails to satisfy community expectations for obvious sections of the upper Snowy such as that immediately below Guthega. The community expects to see water in that section of river. It appears to be a case of “trust us we have looked into it but its too costly” with no opportunity for skilled or experienced community members to contribute to the decision process. With a more open and transparent process – eg a discussion paper inviting comment on the proposal, giving some costs and benefits to the alternatives, new options can arise which may not have been considered.

For example a low cost option for the Snowy below Guthega may be a siphon – extremely simple technology used in other power stations in NSW. Such a solution would likely not require major or costly structural modifications and might deliver suitable outcomes.

The SRA view is that a collaborative decision making process is likely to find the best solutions and also to convince all stakeholders that all options were considered. While not a licence issue this approach is something that should be considered during the licence review process.

Appendix E. Murray–Darling Basin Agreement and Basin Plan

The SRA is pleased to hear it acknowledged that the water released to the Murray and Murrumbidgee rivers is critical to the Murray–Darling Basin. As the effects of climate change become more apparent it is appropriate that the Snowy Scheme be examined to determine its Sustainable Diversion Limits, in the same way as all other Murray-Darling Basin resources.

The SRA is concerned that in the longer term there will be increasing pressure to maintain diversions from the Snowy and its tributaries, despite a lessening of the total catchment inflows. This may potentially reduce the high security water allocations that underpin environmental flows in the Snowy, ultimately pushing us back to the bad old days before SRIF commenced.

The draft report states that “Modelling of the Basin Plan water recovery target assumes the Snowy Mountains Scheme continues providing inflows to the Murray and Murrumbidgee systems.” While it is clear that this will be the case, the implication is that the level of these inflows will not change over time. It is already abundantly clear that there has been a significant reduction in catchment inflows through reduced snow cover. Notwithstanding the “cloud seeding” project, there is no doubt that climate change will reduce the available water in the mountains. If a mechanism is not established to allow these revised available totals to be considered, a crisis will eventually arise which may have dire consequences.

The SRA strongly recommends that some provision be made within the Snowy Water Licence, allowing for the regular review of the impacts of total catchment inflows. As with other matters discussed in the draft report, transparency of these inflows is important and should be publicly available information.