

Snowy Water Licence Review
Intergovernmental and Strategic Stakeholder Relations
Department of Primary Industries Water
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Parramatta, NSW, 2124

I am writing to you regarding my submission to the Draft of the Snowy Water Licence review and issues which I would like to have considered.

At the outset we would like to applaud the fresh approach of DPI Water to engage directly with stakeholders with face to face meetings. It goes a long way towards better working relationships and this type of engagement sometimes provides valuable and additional pieces of information to the stakeholders. Some of this information DPI Water may assume is already known but sometimes it is not the case. The current staff engaged in this work have done a great job in repairing what had become an adversarial approach to DPI and the local community.

This submission would like to address the issues of

The introduction of Moonbah River to provide a natural head water.

The need to have a public gauging station below the confluence of the Moonbah and Snowy River.

The need to scrutinise the accounting practices and numbers in general but especially for spills.

The need for the upper Montane Rivers to have the legislated flows administered in a more appropriate and correct environmental manner.

The need to have more regular reviews of the licence at a minimum of a five year period and with a wider scope of comment.

In regard to the draft report the main aspect that is of concern is the insistence to further investigate the return of the Moonbah River as the natural head of the Snowy River. This reintroduction has been flagged and called for in numerous submissions in the current review; including the submission by the Victorian Govt, National Parks and Wild Life and make direct

reference to the Gippsland Environment Group's submission, supporting its recommendations (which include the reintroduction of the Moonbah) .

Submissions as far back as the review in 2009 contain the same issue that the Snowy needs natural head water. There has been significant science already performed to warrant this change. By decommissioning the Mowamba Weir the Snowy River would be provided connectivity, and with water that is not inert (as is currently delivered from Jindabyne Dam outlet) along with dissolved carbon, it enables the connectivity thus when there is a rain event it provides a natural trigger to fish stocks who could also migrate up into the upper montanes. It will always be required to deliver the lion's portion of the water via Jindabyne Dam. More so if the inevitable occurs which is likely to occur this year and drought restricts the 21% allocation of flushing flows, would it not provide a balance if we can't have the 21% allocation let the Snowy have water that has higher environmental benefit and integrity. The argument that a significant rain event will provide over allocation simply does not hold water. The associated issue of monitoring the amount of water brings up a second issue that there is no public gauging station below the confluence of the Snowy and Moonbah River. Only Snowy Hydro has a gauging station. This lack of information for public record is of a concern. The flagging of in confidentiality flies in the face of the issue that millions of dollars of public monies have been spent to return the Snowy's environmental health but this small tributary is of such great importance that the relevant information as to the amount of water that flows from it is unavailable to the public and is classified.

The way that water is accounted for within the licence and by those charged for administering it appear to be less than satisfactory, specifically spills which at one event will not be allowed to be returned to SHL but then at an earlier time the reverse was true. The licence is a very complex instrument and due to this it is almost impossible which leaves the gate open for interpretation.

Currently practices to provide flows to the upper montane streams seems to be very ad hoc where the annual allocation may be provided but to only one stream. A review as to what is required to adhere to the legislated requirements needs to occur. Unfortunately with these stream out of sight is out of mind for both those charged to implement these flows and more importantly the general public who can't know that they are still damaged and need environmental flows to correct this.

The draft indicated there will be opportunities for evaluations within the time of the next review, one of the items for review being the Moonbah issue. The fact that the reviews are at 10 year interval shows little consideration for the dynamic nature of issues associated with licence and its stakeholders, the environment and ultimately the changing climate. No one can know what climatic conditions or technological advancements might occur in the next 10 years which could have a direct bearing on this whole issue. 5 year review would more appropriate with a more diverse and wider scope to make comment

There are a number of other issues which I would like to have covered but due to the limited scope for submissions I felt that these would not be considered. One of them being the fact there is no independent scientific group that the community can call on. The Snowy Advisory Committee may go some way to attend to this but there can be no substitute for comprehensive scientific investigation of the ongoing environmental changes in the Snowy. The Snowy Bench Marking Team and its work were invaluable to understand in minuscule changes which signalled the improvements in the Snowy. The aspect of independence allows the local community and public to feel confident that decisions made are based on environmental reasons and not cost or profit based positions.

Thank you for this opportunity to raise these issues that hopefully will be considered relevant to the licence and its review

Yours sincerely

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