



16 October 2017

Snowy Water Licence Review  
Inter-governmental and Strategic Stakeholder Relations  
Department of Primary Industry Water  
Locked Bag 5123  
Parramatta NSW 2124

Via email: [snowylicence.review@dpi.nsw.gov.au](mailto:snowylicence.review@dpi.nsw.gov.au)

To whom it may concern:

**Re: Review of Snowy Water Licence: Invitation to inform the ten year review**

The National Farmers' Federation (NFF) thanks you for the opportunity to provide a submission to inform the ten year review of the Snowy Water Licence.

The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. The NFF's membership comprises of all Australia's major agricultural commodities. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations collectively form the NFF.

The NFF supports the positions put forward by our member organisation NSW Irrigators' Council (NSWIC) in its submission regarding the ten year review, drawing particular attention to the following key points:

- DPI Water must ensure that irrigators' water rights and interests are protected throughout the Snowy Water Licence review and no material changes are made to the licence which would disadvantage irrigators or trigger any compensation provisions in the Snowy Water Licence. The NFF seeks assurance from DPI Water that there will be no negative third-party impacts in respect to access to, or timing of, irrigation water supply in the Murray or Murrumbidgee valleys.
- NFF has expressed in principle support for the suite of proposed SDL Adjustment Mechanism Supply Measure Projects, subject to further extensive stakeholder consultation and a detailed and thorough risk assessment of the projects and their potential implications for irrigators and riparian landholders. This includes ensuring that Snowy Water Licence provisions relating to River Murray Increased Flows are effective. To the extent that the current intergovernmental licence and formal rules for the operation of Snow Hydro Limited would allow greater flexibility in the use of environmental flows, without third party impacts, both NFF and NSWIC would be supportive of more detailed assessment of this particular SDL project and the risks associated with the consequential amendments Schedule 4 of the Snowy Hydro Licence.

- While NFF understands that the recent announcement of a possible expansion to the Snowy Hydro Scheme to facilitate pumped hydro storage is not the subject of the Snowy Water Licence Review, NFF takes this opportunity to reiterate its view that Snowy 2.0 must not incentivise Snowy Hydro to shift its operational balance, and affect either the volume or timing of flows to the western rivers, thus resulting in a material change to the timing or reliability of allocation announcements.

I would be more than happy to discuss this matter in further detail if you require. In the first instance, please contact Manager of NRM Policy Ms Jack Knowles on 02 6269 5666 or [jknowles@nff.org.au](mailto:jknowles@nff.org.au).

Kind regards

A handwritten signature in black ink, appearing to read 'Les Gordon', is positioned above the typed name and title.

**Les Gordon**  
**NFF VICE PRESIDENT**  
**CHAIR, NFF WATER TASKFORCE**