## Review of the Snowy Water Licence Submission DALGETY DISTRICT AND COMMUNITY ASSOC

13 JULY 2017

Snowy Water Licence Review
Intergovernmental and Strategic Stakeholder Relations
Department of Primary Industries Water
Locked Bag 5123
Parramatta NSW 2124

Thank your for the opportunity to provide a response to the draft report of the Snowy Water Licence and issues within the draft report which we feel need further examination.

The Dalgety District and Community Association is a local community group and has a strong focus on community issues with almost three decades of involvement with environmental restoration of the Snowy River as being a core issue.

Even though the report recognises the importance of the reintroduction of the Moonbah as the head water for the Snowy River but it still indicates that more investigation is necessary. This issue has been up for consideration since the 2007 review and to suggest that the river may have to wait till the next review for affirmative action, flies in the face of the plethora of science reports that have already been written about the health benefits that it can bring to the Snowy, its aquatic life and in stream vegetation.

The Snowy needs head water to provide upstream connectivity; improved triggers for spawning and regulating in-river temperatures as are reference to in the Snowy water Licence Schedule 3, Part 2. But the environmental aspect of oxygenation and provision of in stream carbon are just as critical, and features that the Mowamba can deliver which Jindabyne Dam waters cannot.

In the 2007 review of the licence, a major number of responders flagged this as a fundamentally important action to be taken. They recognised the

Mowamba provides a type of water that the flows over the Jindabyne Dam outlet cannot and cannot reproduce the environmental benefits of the Mowamba. The water once diverted from the Moonbah River into Jindabyne Dam becomes inert and lifeless. In addition the upper stratas may reach unacceptably high temperatures which make it detrimental as a water release as part of the flushing flows. It can be seen in many of the current submissions, many of which replicate responses to the previous licence reviews, including those currently from the Victorian Government and National Parks and Wild Life, flag the importance of decommissioning the Mowamba Weir. Therefore it is hoped that it will be taken very seriously and actioned instead of having more investigative work done. That is, unless the investigation relates to finding a short term modification works to enable the Mowamba Weir to be manipulated to allow connectivity between the waters of the Moonbah and Snowy Rivers, with the ultimate aim for its complete decommission.

At the recent Cooma stakeholder meeting conducted by DPI Water, we found it to be very informative and fruitful. This gave those attending great heart, as the relationship in the past has been challenging and particularly non transparent with the changing New South Wales Governments and the varying ministerial departments which have been charged with managing the restoration of the Snowy. It is the last aspect of non transparency which is another issue of concern. It is associated inconsistencies are perhaps due to the constant changes "as to who is in charge" of this world renowned multibillion dollar rescue scheme. Right now it is in a transition phase between DPI and OEH. The result of this has translated into issues with the methodology employed as valuable long term staff have been released, management, timeliness, and general communication and with stakeholders have also suffered. Releases to the upper Montane streams could also come under this concern as their treatment appears to be inconsistent and appears to be based more on cost effectiveness than environmentally appropriate management. Due to their location out and away from public view it is difficult to ascertain if the works as required in the licence do meet the necessary legislated outcomes.

Associated with these challenges is the reporting and accounting for waters involved with the licence, a concern for the Mowamba and historically how its flows have been misreported as a part of the complicated numbers to calculate and provide the annual flow requirements. This is much like the aspect of the spills, as there also appears to be anomalies as to how they are treated and in the past repatriated back to Snowy Hydro when this may not have been required. The aspect of accounting must be more stringent and have clarity for the public record and to enable stakeholders to have respect for those who implement the licence and oversee it. In addition the ability to accurately know what the volumes are and how this translates into above target water for Snowy Hydro and the impact and repercussions on Murray Increased Flows has always been as issue of debate. This needs to be investigated, so it can become clear and transparent which will assist needless stakeholder concern, conflict and clarify this grey area of access to waters held over for release.

In closing the other salient issue is the need for reviews to occur at least every 5 years as the environment is a dynamic and changing object. With the wild fluctuations in weather and more importantly drought and increase in temperature it is folly to wait every 10 years to reassess if we have got it right or there is need of variation. It cannot be considered good stewardship of such an important task involving a national icon the Snowy River. Thank you once again and look forward to reading the other submissions and please contact me in regarding any issues with our submission.

## Regards

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