

**National  
Farmers  
Federation**

**Issues Consultation:  
Independent Review of  
the Snowy Water Inquiry  
Outcomes  
Implementation Deed**

February 2026



## The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade, and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

### NFF Member Organisations



## Executive Summary

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Department of Climate Change, Energy, the Environment, and Water (Department) Independent Review of the Snowy Water Inquiry Outcomes Implementation Deed (SWIOID).

The Snowy Hydro Mountains-Electric Scheme (Snowy Scheme) is comprised of a significant network of dams, power stations, tunnels, and other infrastructure designed to capture and divert water from alpine catchments into inland river systems to support irrigation, hydro-electricity generation, and environmental outcomes. Water is captured from the Snowy River and its tributaries and released into the Murray and Murrumbidgee Rivers. SWIOID establishes the arrangements by which these outcomes are delivered. It is the first agreement in Australia to create a legally enforceable commitment for annual environmental water delivery.

This submission complements that provided by New South Wales Irrigators' Council (NSWIC). NFF's primary interest is ensuring that any changes arising from the Review maintain the reliability of downstream water entitlements and avoid unintended impacts on agricultural water users.

## Environmental Condition of the Upper Murrumbidgee

### **Q7. How can the environmental flow releases in the Deed make an improved contribution to environmental outcomes? Can staged increases of environmental flows be related to specific environmental outcomes?**

Environmental flow releases under SWIOID could make an improved contribution to environmental outcomes through greater flexibility in the timing and sequencing of flows, consistent with contemporary environmental water management practice and without affecting entitlement reliability. Experience across the Murray-Darling Basin demonstrates that environmental outcomes can be improved when releases are responsive to natural rainfall cues and seasonal conditions (this includes the ability to vary timing and flow rates over shorter intervals when necessary).

## Securing Reliability of Water Entitlements

Protecting the reliability of water entitlements (including those downstream) must remain a central consideration of this Review. Changes to operational arrangements or flow pathways such as that contemplated from Tantangara Dam (Page 4 of the Issues Consultation Report) must not reduce entitlement reliability or shift risk onto licence holders.

## Upper Murrumbidgee Release Arrangements

### **Q10. How can the operation of Deed (i.e. water releases from Tantangara Dam) support environmental health during drought conditions?**

The Review proposes consideration of updated arrangements for releases from Tantangara Dam into the Upper Murrumbidgee River. Any changes to release pathways must carefully

consider the implications for downstream water availability and entitlement reliability. Releasing greater volumes of water through the Upper Murrumbidgee has the potential to increase transmission losses compared with the current operating approach where water is released through the Tumut system and down to Blowering Dam. This risks reducing allocations for general security irrigation licence holders and availability in the consumptive pool.

## Addressing Transmission Losses

Any changes to environmental flow delivery arrangements under the Deed must ensure that transmission losses are not borne by water entitlement holders or deducted from the consumptive pool. Where environmental flows result in increased transmission losses, these should be managed by Governments or relevant environmental water holders (i.e., offset) rather than being transferred to licence holders.

NFF notes there is precedent for this approach. On previous occasions (as was done in the Drought Operating Framework), transmission losses associated with environmental water delivery have been offset by the Commonwealth Environmental Water Holder (CEWH) by choice, ensuring that irrigators did not bear any shortfall.

## National Agreement on Closing the Gap

### **Q15. How could water management arrangements better align with the National Agreement on Closing the Gap?**

Implementation of Closing the Gap commitments regarding water-related targets for Indigenous peoples is being progressed individually by State and Territory Governments. At the Joint Council on Closing the Gap in July 2024, Governments agreed to progress Inland Waters Target (15C) through jurisdictional targets rather than through a national target. In recognition of this agreed approach, NFF considers that this Independent Review which is being led Federally by the Commonwealth Department is not the appropriate mechanism to establish or make recommendations regarding national water management arrangements in relation to the National Agreement on Closing the Gap.

## Conclusion

Please do not hesitate to contact Warwick Ragg, General Manager, Natural Resource Management, via e-mail: [WRagg@nff.org.au](mailto:WRagg@nff.org.au) at the first instance to progress this discussion.



National  
Farmers  
Federation

Leading  
Australian  
Agriculture

NFF House  
14-16 Brisbane Avenue  
Barton ACT 2600

Locked Bag 9  
Kingston ACT 2604

(02) 6269 5666  
[reception@nff.org.au](mailto:reception@nff.org.au)  
[nff.org.au](http://nff.org.au)

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