

Draft Report: Independent Review of the Snowy Water Inquiry Outcomes Implementation Deed

August 2026



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NFF Member Organisations



7 August 2026

Snowy Deed Review Team
Department of Climate Change, Energy, the Environment, and Water
GPO Box 2013
Canberra ACT 2601

Via Email: snowydeedreview@dcceew.gov.au

Dear Sir / Madam,

RE: Draft Report: Independent Review of the Snowy Water Inquiry Outcomes Implementation Deed

The *National Farmers' Federation* (NFF) welcomes the opportunity to provide a submission to the *Department of Climate Change, Energy, the Environment, and Water* (DCCEEW) regarding the publication of the *Draft Report: Independent Review of the Snowy Water Inquiry Outcomes Implementation Deed*. NFF's submission to the *February 2026 Issues Consultation* (**Attachment 1**) remains current and should be read together with this submission.

At a high-level, NFF does not support the proposed changes to the Upper Murrumbidgee environmental flow regime. In particular, we do not support the progression of Recommendation 1 where the Review's own modelling identifies potential reductions in downstream allocations and diversions. As outlined and consistent with our initial submission, protecting the reliability of water entitlements (including those downstream) must remain a central consideration of this Review. Changes to operational arrangements or flow pathways must not reduce entitlement reliability or shift risk onto licence holders. If Governments nevertheless determine that increased flows should proceed, the more limited approach contemplated under Option 5 represents a more cautious starting point than progression to the full 30% target, particularly while infrastructure costs and broader system impacts remain uncertain.

The Draft Report characterises the modelled impacts on downstream water users as relatively small and manageable – we do not accept that characterisation. While the modelling indicates that high-security entitlements remain unaffected, it identifies potential reductions in general security diversions of around 2-3% in drier years and reductions in end-of-year allocations of between 1-3%. This is not an immaterial number given the significance of these systems, especially in dry years, nor do these impacts take into account for the cumulative impact of other changes affecting entitlement reliability in the Murrumbidgee.

NFF supports Recommendation 4 that the *Australian Capital Territory* (ACT) Government provide sufficient water entitlements to offset transmission losses associated with any additional Upper Murrumbidgee environmental flows. This should be a prerequisite to any increase in flows. The same principle should apply broadly to other third-party impacts arising from altered operating arrangements. As stated in our initial submission, existing entitlement holders must not bear the cost or risk associated with implementing additional environmental flows.

NFF also supports Recommendation 2 proceeding before any decision is made to pursue higher flow options requiring an upgrade of the Tantangara Dam outlet. The cost of that infrastructure remains a significant unknown and should be properly established before Governments consider options dependent upon it.

Similarly, greater flexibility under the adaptive operating framework proposed in Recommendation 8 must be managed carefully. Changes to the timing of releases, carryover, or interannual water management must not result in the *Required Annual Release* being diminished downstream or otherwise reduce water availability or entitlement reliability. Downstream water users must be directly involved in the development of such considerations.

The Draft Report also acknowledges that detailed quantitative re-modelling of the *River Murray Increased Flows* package was not undertaken, which we consider to be a significant limitation given the interconnected nature of Snowy Scheme operations and downstream *Murray-Darling Basin* water systems. In this context, the consequences of the proposed changes cannot be assessed in isolation by itself. Any changes that alter the timing, location, or distribution of water should not proceed until their broader system impacts are properly understood, including implications for Murrumbidgee and Murray water users where relevant.

NFF supports improved coordination between the ACT and *New South Wales* (NSW) in planning for future critical human water needs under Recommendation 15. Any additional water requirements arising from population growth must be addressed transparently and without transferring impacts to existing entitlement holders. Where additional entitlements are required in the circumstance where water needs cannot be met through either infrastructure upgrades, changes to water management, water efficiency works, and improved waste management practice, then voluntary market-based approaches can be considered options for consideration.

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

Attachments List

- 1. *NFF Submission (February 2026): Issues Consultation: Independent Review of the Snowy Water Inquiry Outcomes Implementation Deed.***



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

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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 at the first instance to progress this discussion.



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