



Murrumbidgee to Googong Water Transfer Annual Performance Report 2022 and 2023

**For the period August 2022 to
August 2023**

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1 Document management

Document summary

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3 Introduction

3.1 Purpose

This report addresses Commonwealth Condition of Approval No.6 of approval EPBC 2009/5124 for the Murrumbidgee to Googong Water Transfer (M2G) project under the Environment Protection and Biodiversity Conservation Act 1999 (Cth).

3.2 Background

The Murrumbidgee to Googong Water Transfer (M2G) is a 12km pipeline that enables the pumping of water from the Murrumbidgee River, ACT to Burra Creek, NSW, where it then flows ~13 km to the Googong Reservoir. Following regulatory approvals from the Commonwealth, ACT and NSW, pipeline construction commenced in January 2011, and the M2G became operational in September 2012.

3.3 M2G Status

During the reporting period, no water was transferred from Murrumbidgee River to Burra Creek and Googong Reservoir. M2G is currently in standby mode, and maintenance sessions were postponed due to technical issues with the high lift pump station. The operate-to-maintain sessions will continue soon (due for September 2023) to ensure that infrastructure remains in good working condition. Icon Water's M2G pipeline was reclassified as a water pipeline and is now subject to revised operating conditions.

The company revised the [M2G Operational Environment Management Plan](#), which now integrates both the Stream Flow and Water Quality Management Plan and the Aquatic Ecology Monitoring Plan into the document's main body.

4 Performance

Icon Water must comply with Commonwealth Condition of Approval No. 6 (Publication Requirements) to furnish an Annual Performance Report on the implementation of approval conditions and any plans necessary. The report covers M2G's performance from August 2022 to August 2023.

The performance is evaluated against the objectives and targets specified in Table 4 of the M2G Operation Environmental Management Plan (OEMP) in Section 4.2 and the Commonwealth Conditions of Approval (EPBC 2009/5124) in Section 4.1.

4.1 Performance against Commonwealth Conditions of Approval

CoA Ref#	Requirement	Compliance Status	Comments
1.	Submit an Extraction and gauging Plan that meets CoA 1a-1d.	Condition met	The original Plan was approved on March 22, 2012.
	Implement Extraction & Gauging Plan	Ongoing	An updated Streamflow & Water Quality Management Plan, which included the Extraction & Gauging Plan, was approved on August 4, 2014. The Commonwealth approved variations to this Plan in 2015 and 2018. The M2G Operation Environmental Management Plan (OEMP) was implemented throughout the reporting period. Note that the OEMP was revised in 2022 to consolidate sub-plans into a singular and more active working manual for operators.
2.	Submit a Sustainable Diversion Limit Plan	Condition met	The original Plan was approved on April 15, 2011.
	Implement Sustainable Diversion Limit Plan	Ongoing	The Sustainable Diversion Limit Plan was incorporated into an updated OEMP approved by the Commonwealth in 2022. N/A for current operating period
3.	Submit a Biodiversity Management & Offset Plan that meets CoA 1a-1l.	Condition met	The original Plan was approved on April 15, 2011.
	Implement Biodiversity Management & Offset Plan	Ongoing	The Biodiversity Management & Offset Plan was incorporated into an updated Offset Delivery Plan approved in April 2012. The M2G Offset Delivery Plan was implemented throughout the reporting period.
<p>Note that a revised Operational Environment Management Plan (OEMP) and corresponding sub-plans, including the Offset Delivery Plan (ODP) and the Landscape Rehabilitation and Terrestrial Ecology Management Plan (LRTEMP), were approved by the Commonwealth in 2018. The revision of these plans led to a consolidation in 2022. However, the ODP continues as a standalone sub-plan.</p>			
4.	Submit a Burra Creek Environmental Management Plan that meets CoA 4a-4e.	Condition met	The original Plan was approved in March 2012.

	Implement Burra Creek Environmental Management Plan	Ongoing	The Burra Creek Environmental Management Plan was implemented in the revised OEMP.
5.	Prepare and implement a Decommissioning & Closure Plan at least one year before decommissioning.	N/A	Decommissioning is not anticipated in the medium to long term.
6.	Provide Annual Performance Reports and publish them on the Icon Water website	Ongoing	Between 2013 and 2022, Annual Performance Reports were submitted to the Commonwealth and published on an external website.
7.	Maintain accurate records of activities and make them available on request	Ongoing	Accurate records are kept and are available on request. No data requests were made during the reporting period
8.	Variations must be submitted to the Minister for approval and implemented if approved.	N/A	N/A for current operating period
9.	Variations sought by the Minister	N/A	N/A for current operating period
10.	Advise the Department of the commencement of construction and operation.	Condition met	Icon Water advised the Commonwealth of the commencement of construction on 31/01/2011. Icon Water advised the Commonwealth of the commencement of operation on 27/09/12 in a letter dated 04/10/12.
11.	Upon direction of the Minister, an independent audit of compliance with the CoA is conducted and reported to the Minister.	N/A	N/A for current operating period

4.2 Performance against Objectives and Targets of the OEMP

Objectives	Performance	Targets	Performance
<p>1. To employ practices which ensure that the operation and maintenance of the water transfer infrastructure: Meet all environmental legislative requirements and comply with all planning approvals are conducted in a manner that minimises adverse environmental impacts.</p>	<p>Icon Water implemented the full suite of management plans for the reporting period. The current approved plans are: OEMP Biodiversity Offsets Delivery Plan All regulators approved a revised Operational Environment Management Plan (OEMP) before February 2022.</p>	<p>Ensure the Operation Environmental Management Plan (OEMP), relevant sub-plans, Icon Water policies, processes, and systems capture all environmental legislative requirements and compliance with all planning approvals.</p>	<p>The M2G Compliance Register, mapping conditions of approval and ES&PER commitments to a plan/process and responsible person, is retained on Icon Water's SharePoint intranet system.</p>
		<p>Maintain up-to-date and regularly reviewed versions of the OEMP and relevant sub-plans and carry out all operation and maintenance activities according to these documents.</p>	<p>The current OEMP is available on the Icon Water Integrated Management System (IMS) as controlled documents and external internet site and forms the basis of all operations and maintenance activities.</p>
		<p>Report all environmental incidents to the relevant authorities as the approval documentation and legislation outline.</p>	<p>All M2G environmental incidents were reported to the relevant authorities and entered Icon Water's Incident Management System (Guardian). Any incidents during the reporting period were responded to as specified in the Operational Environmental Management Plan. There were no Incidents reported during the reporting period.</p>
		<p>If environmental incidents occur, review, and modify the OEMP and relevant sub-plans as required to ensure that similar incidents do not happen in the future.</p>	
<p>2. To employ practices that minimise impacts on aquatic ecology.</p>	<p>Aquatic ecology monitoring programs required under the OEMP have been implemented through the Murrumbidgee Ecological Monitoring Program (MEMP) and reports published on the Icon Water external website.</p>	<p>Establish a credible aquatic ecology and water quality baseline data set before operation.</p>	<p>Pre-operation baseline data for the Murrumbidgee River and Burra Creek has been established (commenced 2008-09) through the MEMP.</p>
		<p>Take all reasonable measures to prevent fish impingement on intake screens at the Murrumbidgee River.</p>	<p>N/A for current operating period</p>
		<p>No translocation of alien fish species from the Murrumbidgee River to Burra Creek.</p>	<p>The M2G intake has fish egg filters to prevent eggs from getting into Burra Creek. Investigations in 2013 & 2023 found no fish in the creek.</p>
		<p>Establish credible site-specific water quality trigger levels for Burra Creek under the principles of the ANZECC Guidelines.</p>	<p>Site-specific water quality trigger levels for Burra Creek are outlined in the OEMP. The trigger levels are based on advice from the consultant monitoring ecologist (GHD) and the ANZECC Guidelines.</p>
		<p>Undertake additional ecological monitoring if the quality of water transferred is outside site-specific ANZECC Guideline trigger levels.</p>	<p>N/A for current operating period</p>

		Take all reasonable measures to prevent exceedance of site-specific impact thresholds for species in the Murrumbidgee River and Burra Creek.	
3. To employ practices that minimise impacts on the geomorphology of Burra Creek.	The OEMP (which manages transfer flow volumes to protect geomorphological integrity) was implemented as required. Geomorphology monitoring undertaken based on the requirements of the AEMP and delivered through the MEMP has been published on the Icon Water external website.	Before operations commence, establish monitoring programs for bank erosion.	A geomorphology monitoring program has been in place since 2009 as part of the baseline data collection (MEMP).
		Respond within reasonable timeframes with appropriate mitigation measures if bank erosion is detected.	No bank erosion has been detected associated with M2G operations.
		Establish monitoring programs for the erosion of pond-forming bars before operations commence.	A geomorphology monitoring program has been in place since 2009 as part of the baseline data collection (MEMP).
		Respond within reasonable timeframes with appropriate mitigation measures if pond-forming bars are eroded.	N/A for current operating period
		Before operations commencing, establish monitoring programs for London Bridge karst formation.	A geomorphology monitoring program has been in place since 2009 as part of the baseline data collection (MEMP).
		Take all reasonable measures to prevent incidences of erosion that could cause structural weakening at London Bridge.	No erosion has been detected in Burra Creek associated with M2G operations.
4. To employ practices that minimise impacts on terrestrial ecology.	The Landscape Rehabilitation & Terrestrial Ecology Management Plan and Offset Delivery Plan were implemented as required. Monitoring reports required under these plans have been published on the Icon Water external website.	Before operations commence, establish a compensatory habitat offset package that meets the authorities' requirements in the three jurisdictions.	The M2G Biodiversity and Offset Management Plan was approved for construction in 2010 and the Offset Delivery Plan was approved in 2012. Recently, a revised Operational Environment Management Plan was developed along with the corresponding sub-plans, including the Offset Delivery Plan. The Landscape Rehabilitation and Terrestrial Ecology Management Plan was approved by the Commonwealth in 2018 and is now complete.
		Take all reasonable measures to prevent weed infestation after start-up. If infestation occurs, they will be treated as agreed in the relevant Property Interaction Plan with the landholder.	Property Interaction Plans are in place and remain the key document outlining Icon Water's engagement with property owners.

		Consistent compliance with the construction area rehabilitation plan requirements throughout the scheme's operation.	All landholder rehabilitation areas have been handed back.
5. To employ practices that minimise impacts on heritage.	to protect heritage values such as London Bridge) was implemented as required. No additional works were undertaken within the reporting period that had any interactions with heritage values.	<p>Take all reasonable measures to prevent incidences of erosion that could cause structural weakening at London Bridge, which could affect heritage values.</p> <p>Take all reasonable measures to prevent complaints about impact at recognized aboriginal heritage sites due to operation or maintenance.</p>	N/A for current operating period
6. To employ practices that minimise noise and vibration impacts.	<p>In 2013, Icon Water sent to the ACT and NSW regulators an <i>M2G Compliance Noise Assessment</i> (Feb 2013) and a <i>M2G Discharge Structure Noise Monitoring Report</i> (Mar 2013) assessing noise impacts associated with the operation of the discharge structure at the M2G project.</p> <p>Both regulators approved the noise report, which specifically outlined the operational noise levels and concluded that the noise levels comply with Icon Water's legislative and project requirements.</p> <p>Icon Water continues to manage noise and vibration arising from maintenance through control embedded within Work Instructions.</p>	<p>Take all reasonable measures to prevent noise and vibration complaints associated with operation and maintenance activities. If complaints are received, they will be responded to following the Icon Water Complaints Handling Process outlined in Figure 5.1 of the M2G Community Information Plan.</p> <p>Take all reasonable measures to prevent structural damage claims associated with vibration impacts due to operation and maintenance activities.</p> <p>Maintain noise levels in compliance with Schedule 2 Part 2.2 of the Environmental Protection Regulation 2005 (ACT) or at levels endorsed by the ACT EPA.</p> <p>Maintaining noise levels in NSW below 35 dB L (15 minutes) in compliance with NSW Criteria limits as set out in the NSW Industrial Noise Policy (INP) (DECC 2000) or at levels endorsed by the NSW EPA. If necessary, utilize Source Control (best management practice and best available technology economically achievable) in conjunction with Transmission Control before Receiver Controls (refer to INP Section 7) to ensure noise levels are not exceeded.</p> <p>Take all reasonable measures to prevent complaints about impact at recognized aboriginal heritage sites due to operation or maintenance.</p>	

7. To employ practices that minimise the impact on air quality	Icon Water continues to manage to prevent dust emissions and odours arising from operation and maintenance. No complaints were received during the reporting period.	Take all reasonable measures to prevent visible dust emissions and offensive odours during operation and maintenance.	N/A for current operating period
8. To employ measures that minimise bushfire hazard and manage bushfire risk	The Offset Delivery Plan, including a Bushfire Management Sub Plan, was implemented as required. Icon Water needs all workers to follow Work Instructions, which include bushfire hazard and ignition risk controls.	Take all reasonable measures to prevent bushfires attributable to water transfer operations and maintenance.	Icon Water uses Work Instructions to prevent bushfires caused by their operations and maintenance. These instructions prohibit hot works during high bushfire danger periods and require fuel load and fire trail inspections during biannual offset condition assessments.
9. To employ practices that minimise noise and vibration impacts.	In 2013, Icon Water sent to the ACT and NSW regulators an M2G Compliance Noise Assessment (Feb 2013) and an M2G Discharge Structure Noise Monitoring Report (Mar 2013) assessing noise impacts associated with the operation of the discharge structure at the M2G project. Both regulators approved the noise report, which specifically outlined the operational noise levels and concluded that the noise levels comply with Icon Water's legislative and project requirements. Icon Water continues to manage noise and vibration arising from maintenance through control embedded within Work Instructions.	Take all reasonable measures to prevent noise and vibration complaints associated with operation and maintenance activities. If complaints are received, they will be responded to following the Icon Water Complaints Handling Process outlined in Figure 5.1 of the M2G Community Information Plan.	N/A for current operating period
		Take all reasonable measures to prevent structural damage claims associated with vibration impacts due to operation and maintenance activities.	N/A for current operating period

		Maintain noise levels in compliance with Schedule 2 Part 2.2 of the Environmental Protection Regulation 2005 (ACT) or at levels endorsed by the ACT EPA.	N/A for current operating period
		Maintaining noise levels in NSW below 35 dB L _{are} (15 minutes) in compliance with NSW Criteria limits as set out in the NSW Industrial Noise Policy (INP) (DECC 2000), or at levels endorsed by the NSW	N/A for current operating period
	To protect heritage values such as London Bridge) was implemented as required. No additional works were undertaken within the reporting period that had any interactions with heritage values.	This could cause structural weakening at London Bridge, affecting heritage values. Take all reasonable measures to prevent complaints about impact at recognised aboriginal heritage sites due to operation or maintenance.	Icon Water has not received any complaints regarding M2G operations and maintenance interacting with recognised aboriginal heritage sites.

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