

Gippsland Environment Group Inc
Submission to the 10 year Review of the Snowy Water Licence

To:
Snowy Water Licence review
Inter-governmental and Strategic Stakeholder Relations
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The Snowy Water Licence (SWL) was issued by the NSW Government to Snowy Hydro Limited (SHL) in May 2002 for a term of 75 years following corporatisation of the Snowy Mountains Scheme, and varied in 2010 and 2011. It permits exploitation of the waters of the Snowy Mountains catchment by SHL to the severe detriment of the environmental health of the 12 rivers and 71 streams affected by the Scheme. The SWL contradicts the commitments the three government shareholders of SHL have made to sustainable water management under the National Water Initiative and the Commonwealth Water Act.

Gippsland Environment Group is concerned about the capacity of DPI Water to undertake the 10-year Review of the Snowy Water Licence in a fair and informed manner. This Review is being undertaken by DPI Water at a time when questions have been raised and investigations are underway regarding serious failures of governance by NSW water managers. The Review is also being carried out when the last remaining scientists involved in the Snowy Water Initiative have been made redundant.

In addition amendments by the NSW Government in 2014 to the NSW Snowy Hydro Corporatisation Act (1997) (the Act) removed the independent Snowy Scientific Committee (SSC), consequently there have been no independent state of environment reports produced by the SSC since 2011 to inform public submissions to this review or any further review or variation of the SWL as was originally required under the Act. It would appear that the NSW Snowy Hydro Corporatisation Amendment (Snowy Advisory Committee) Act 2014 has not been formally assented to therefore the NSW Government is still legally obliged to ensure the SSC is operational and the SSC has produced annual state of environment reports which must be publicly available.

Gippsland Environment Group's key recommendations regarding the Licence Review are detailed below:

Snowy River Increased Flows

1. The SWL (Schedule Three Part Four) should be amended to permit Snowy River Increased Flows to be delivered via a combination of releases from Jindabyne Dam and Mowamba weir.

According to the SWL (Schedule 3 Part Two 7.2 (2)) after the third anniversary of the corporatisation date Snowy River Increased Flows must be made under Part Four of Schedule Three, which determines that the licensee must operate the works so as to target SRIF from Jindabyne Dam.

However it would be in the best interests of the environmental health of the Snowy River to deliver the SRIF from Jindabyne Dam in combination with unregulated natural flows from the Mowamba River. The Mowamba River has a relatively smaller mean annual natural flow but can contribute significant environmental benefits such as dissolved carbon and silica, water of suitable temperature, and colonising micro-fauna and propagules etc which are absent from SRIF delivered via releases of impounded waters from Jindabyne dam. The Mowamba River would add natural flow variability and reinstate snow melt connectivity and act as surrogate headwaters for the highly regulated Snowy River.

Many submissions to the first Five-year Review of the SWL in 2009 also recommended that Mowamba Aqueduct should be decommissioned to improve the environmental condition of the Snowy River and restore connectivity to headwater flows. Submissions (including from the Victorian Government) recommended that the licence should be amended to permit Snowy River Increased Flows to be delivered via a combination of releases from Jindabyne Dam AND Mowamba weir. The Snowy Scientific Committee's first report, *Adequacy of environmental releases to the Snowy River* (Oct. 2008), identified the vital environmental benefit the variable natural flows of the Mowamba River could provide to the total Snowy River Increased Flows.

However when the NSW Government unilaterally released its *Final report- Five-year review of the Snowy Hydro Water Licence, Licence review – May 2002-May 2007* (Nov. 2009:6) it was proposed that the Office of Water would “investigate by 2012 options for better achieving environmental objectives under low flow conditions, including options for the decommissioning of Mowamba Aqueduct.”

As of October 2017 the NSW Government has still not delivered on that proposed action.

The 10-year Review is an opportune time to amend the SWL to ensure that Snowy River Increased Flows may be delivered via Mowamba weir and Jindabyne dam; and Mowamba Aqueduct is permanently decommissioned.

The now disgraced ex-MLC Ian McDonald played a key role as NSW Minister for Primary Industries during the period of the first Five-year Review. Gippsland Environment Group recommends that a full review of the original decision in 2009 not to amend the Licence in this regard (and decommission Mowamba Aqueduct) is urgently required.

2. Snowy River Increased Flows deducted in contravention of the Licence must be repaid.

Following major floods in the Snowy River in March 2012 there was a significant spill of 16GL from Jindabyne Dam due to inflows from the catchment at a volume not seen since the mid-1970s. At the time SHL requested that the spill be accounted for as the SRIF spring releases even though the floods occurred in autumn. The NSW Office of Water declined to do so.

According to SWL (*Provisions to Address the Realities of Water Operations* s5 (2)(d)) if in any Water Year the actual release varies from the volume targeted for release, in the case of an excess release, where the excess is the *result of a flood or necessary operational releases from the spillway gates* then the difference is **not** subtracted from the release otherwise required during the subsequent Water Year.

However, Snowy River Increased Flows are now being deducted at 2GL/yr for four years from 2015-16 to repay Snowy Hydro Ltd for a release of additional water that was *due to a natural spill event in 2012-13* (*Strategy for SRIF 2017-18*, NSW DPI Water, May 2017 p.11).

Why then have the SWI partners agreed to pay back 8GL to SHL over four years (*Strategy for SRIF 2017-18* p. 11)?

As this additional release was due to a natural spill event and not due to the implementation of *water operation arrangements that result in an increase in the volume or frequency of spills from Jindabyne Dam* (as per SWL Schedule 3 s16.1) the deduction appears to be inconsistent with the Licence provisions and should be repaid to SRIF.

3. SWL Schedule Three Part Two s6.5 *Operation of Outlet at Jindabyne Dam* must be amended to delete the mandatory requirement for the Licensee to *selectively withdraw water from the near surface horizon of the reservoir for the water being released for riparian flows and SRIF.*

In 2010 following the first Five-year Review of the SWL this new clause was inserted into the SWL despite advice from the Snowy Scientific Committee¹ that near surface water in Jindabyne dam in summer to a depth of 5 metres can be higher than 20° Celsius, which is unsuitable for trout and montane native fish. It is important therefore that warm water from above the thermocline is not released during late summer and autumn into an already warm stratified Snowy River below Jindabyne Dam.

This mandatory requirement in the current SWL for SHL to make releases from Jindabyne Dam from the near surface horizon should be deleted as it requires SHL to make releases that are detrimental to health of the Snowy River.

¹ *Environmental releases from Jindabyne dam: Recommendations for 2009-10*, Snowy Scientific Committee, June 2009.

If it is the case that Snowy Hydro Ltd intends to continue to use the new off-take at Jindabyne Dam, due to the considerable cost of its construction², for SRIF releases, then a solution must be found to mitigate the environmental damage.

The obvious solution (and one that would provide a number of additional environmentally beneficial outcomes) would be to permanently decommission Mowamba Aqueduct to enable mixing flows to be delivered via the Mowamba River to the Snowy River.

4. Passing flows over Mowamba weir must be delivered as part of total annual Snowy flows and not identified as excess releases to be repaid the subsequent year.

According to the SWL (1.1(85)) *Snowy River Increased Flows means releases of water in addition to the base passing flow*. According to the SWL (1.1 (13)) *Base passing flow means: (a) with respect to the Snowy River: the volume of 9GL per water year from Jindabyne dam plus the non-regulated flow past the relevant works on the Mowamba River and Cobbon Creek prior to the Corporatisation date*.

In 2004, the Snowy River Flow Response Monitoring Project identified³ the un-regulated passing flow over Mowamba weir prior to Corporatisation as 24GL/yr. The Snowy Flow Response Monitoring Project later revised this figure down to 18GL/yr⁴ based on information contained in a Snowy Mountains Hydro-electric Authority document⁵.

The Snowy Water Inquiry Outcomes Implementation Deed (SWIOID) 2002, (Part two, clause 7.3 *Derivation of Increased Flows*) identifies that the staged target SRIF volumes were added to the total base passing flow to calculate the percentage equivalent average natural flow. Total Snowy flows were to be measured immediately below the confluence of the Snowy and Mowamba Rivers (SWIOID 1.2(o)(i)).

In other words the 2012 SRIF staged target flow of 212 GL/yr is only equivalent to 21% MANF below Jindabyne Dam, if in addition to the 212 GL allocation, and 9GL in regulated base passing flow from Jindabyne, there is 18-24 GL in un-regulated passing flows contributed in spills over Mowamba River and Cobbon Creek weirs.

Without the passing flows over Mowamba and Cobbon Creek weirs there is approx. 2% shortfall in the total annual Snowy River flows referred to as a percentage of Mean Annual Natural Flows below Jindabyne.

Gippsland Environment Group is concerned that passing flows over Mowamba and Cobbon Creek weirs are in fact being identified as Excess Releases and deducted from the SRIF allocation in any subsequent year.

² Pers com. Simon Williams ex DPI Water Oct 4th 2017 Snowy River Day presentation Dalgety, NSW.

³ *Fact sheet 2, Snowy River recovery*, Nov. 2004, Snowy Flow Response Monitoring Project, NSW DIPNR

⁴ *Derivation of staged environmental flow release volumes to the Snowy River downstream of Jindabyne Dam*, Snowy River Flow Response Monitoring Project, Feb 2005 NSW DIPNR.

⁵ *Snowy Mountains Hydro Electric Authority: Spills and riparian release, average scheme inflows and diversion 1905-1987 statistics and information design reports for structure and operational records based on G/D.G.E.N./31/1 and I.S./G-GEN/76/1*, SMHEA. 1998.

Firstly, there is no public access to the flow data recorded on the Mowamba River gauge at Pats Patch downstream of Mowamba weir. This is a Snowy Hydro Ltd gauge and the company justifies restriction of the information on the basis of commercial-in-confidence. There is also no NSW DPI Water automatic gauge immediately below the confluence of the Snowy and Mowamba contrary to the requirements of the SWIOID so there is no public information regarding the real volume of Snowy flows at this point.

As SHL delivers 0.4GL via Mowamba weir as a portion of the 9GL regulated base passing flow (that pre-Corporatisation was released in total from Jindabyne Dam) how does SHL/DPI identify whether any flows over 0.4GL are excess regulated releases or simply spills over the weir due to high flows?

Secondly, the Commonwealth Water Amendment Act 2008 (Schedule F Part II s5) defines Excess Snowy River Releases as any releases excluding the 9GL regulated base passing flow and the Snowy River annual allocation as measured below the confluence of the Snowy River and Mowamba River. This definition excludes any spills over Mowamba and Cobbon Creek weirs from calculation of total permitted annual Snowy flows in contravention of both the SWL and SWIOID.

River Murray Increased Flows

5. Re: Schedule 3: *Increased Flow Requirements*

Part One: 1.2 River Murray Annual Allocation to be Transferred to Above Target Water.
This clause should be amended to ensure the RMIF account is managed and accounted for completely separately from Above Target Water (ATW).

SHL has complete discretion over Above Target Water and the volume of ATW is treated as commercial-in-confidence. The SWL requirement for the River Murray Annual Allocation to be stored as Above Target Water in Snowy Hydro's storages is completely inappropriate for the management of taxpayer funded River Murray environmental water and is not in the best environmental interests of the River Murray.

The SWL (*Definition and Interpretations* 1.1(1) (b)) excludes water in the Snowy-Murray and Snowy-Tumut DISV reserve account from ATW. There is no reason therefore that Commonwealth taxpayer funded RMIF acquired to provide environmental benefit for the Murray is not managed in a similarly independent account. An RMIF account should be established and provision made in the SWL for the RMIF account to be managed completely separately (and transparently) from SHL's ATW.

6. Re: Schedule 4: *10.4 Ministerial Corporation May Call Out River Murray Increased Flows*

The SWL should be amended to ensure, that the volume of RMIF 'called out' is totally independent of the volume of Above Target Water held in Snowy Scheme storages; and that the River Murray Increased Flows annual allocation (70GL) is actually released annually.

In 2002 under the Snowy Hydro Corporatisation intergovernmental agreements the Commonwealth contributed \$75 million to Water for Rivers to obtain water savings in the Murray-Darling Basin to return 70GL/yr to the Murray. However until 2017 there was only one release of RMIF, during drought in 2005-06 of 38GL in an agreement between NSW and Victoria to allow forward borrowings from Snowy storages to NSW irrigators. Despite this fact the 70GL/yr RMIF was included in baseline water savings calculations under the MDBA's Basin Plan⁶.

In 2011 the SWL was varied, in part ostensibly to establish a 'call out' provision for RMIF in the Licence. However this provision makes it even less likely that RMIF will be released on an annual basis as it requires that a minimum of 800GL of Above Target Water is held in Snowy storages before the annual RMIF can be 'called out' and then only to the volume that would not reduce the Net volume of Above Target Water to less than 800GL.

Commonwealth taxpayer funded environmental water for the River Murray should not depend on SHL management of Above Target Water in which it has a vested financial interest to maintain at high volumes and which SHL may release to generate electricity when the water is not required for the downstream environment or downstream storages are full and spilling in which case RMIF may be wasted. Secondly this provision will likely prevent releases of RMIF during drought periods when the water is actually most needed.

Under this clause the Ministerial Corporation is required to give notice by 5th October and can only do so once in any one Water Year. This requirement appears redundant given that in Feb-May 2017 100GL of RMIF was released from Hume Dam (rather than from Snowy Scheme storages) in an agreement to substitute water belonging to Vic and NSW Environmental Water Holders in the Snowy (RMIF Water) with water belonging to Vic and NSW General Resource Managers in the Murray (General State Resource water)⁷. In this case the RMIF water was not called out by the NSW Ministerial Corporation by Oct 5th but delivered through other agreements. There needs to be greater public transparency over such processes.

In addition provision should be made in the licence to deliver the accumulated RMIF currently held in Snowy Storages (472GL) to ensure the optimum environmental benefit for the River Murray. This taxpayer funded RMIF should not be retained in Snowy Scheme storages to be used as a resource for SHL's financial benefit.

As mentioned above, SHL is less than transparent in its public reporting of Above Target Water citing commercial-in-confidence provisions. The River Murray Increased Flows are taxpayer funded and the accumulated RMIF volumes and total annual releases should be publicly reported in both the SHL annual reports and on the Snowy Initiative website

⁶ *Hydrological Modelling to Inform the proposed Basin Plan – methods and results*, MDBA publication no 17/12, MDBA Feb. 2012, p8, 3.3 Baseline scenario.

⁷ Mark Twoomey Office of Vic Environmental Water Holder email 17.8.17

managed by NSW DPI Water (or potentially in future by the Office of Environment and Heritage in future).

Snowy Montane River Increased Flows

7. The works to deliver Snowy Montane River Increased Flows to the two sections of the upper Snowy as designated in SWL Schedule Three Table One must be completed by the Licensee.

Gippsland Environment Group strongly objects to the proposal in the *Supporting information-Snowy Water licence review 2017* (NSW DPI Water) p3 that the Montane Riverine works are now complete and therefore the relevant clause is redundant and should be removed from the Licence. This is completely inaccurate as montane riverworks on three key tributaries of the upper Snowy River as per the SWL have still not been initiated.

According to the SWL Schedule 3: Part Five: *Snowy Montane Increased Flows*
19 Modification of Works to Allow Increased Flows

19.1 The Licensee must make the Snowy Montane Increased Flows by modifying the works along the applicable Snowy Montane Rivers to increase the amount of non-regulated flow.

The following works are still to be carried out by the licensee:

a/ The Gungarlin River weir must be modified to allow Snowy Montane Increased Flows environmental releases to occur via the Gungarlin into Snowy River below Island Bend Dam in compliance with the requirements of the SWL.

The Snowy Water Licence⁸ identifies the target releases to the Snowy River below Island Bend Dam (i.e. Snowy Gungarlin) as 29GL by 2012-13. SMRIF below Island Bend Dam have been delivered since May 2013 (target volume 18.9GL) via Diggers and Toll Bar Ck aqueducts which have a combined total average annual flow of only 22GL⁹. Whilst these two creeks enter the upper Snowy River higher up the river thus closer to Island Bend Dam wall than the Gungarlin River, it is impossible for the required SMRIF of 29GL to be delivered solely via these creeks. It is imperative therefore that the Gungarlin weir is modified to ensure compliance with the target releases for this section of the Upper Snowy River to be delivered.

b/ The Perisher Ck aqueduct must be modified to allow Snowy Montane Increased Flows (i.e. Snowy River Perisher/Rams Flat) to be delivered below Guthega Dam via Perisher Ck as well as Rams Flat Ck in compliance with the SMRIF requirements of the SWL. Schedule 3 Table One identifies target SRMIF of 30GL to be delivered by 2010-11.

SRMIF releases to the Snowy River below Guthega dam were initiated in May 2016-17¹⁰ but only from the Falls Creek weir. Falls Creek only has a Mean annual natural flow of 3.4GL.

⁸ SWL Schedule Three Table One: GWH conversion of GLs Forgone on Snowy Montane Rivers

⁹ *Corporatisation of the Snowy Mountains Hydro-electric Authority – Draft Environmental Impact Statement* Commonwealth Govt Dept Industry Science and Resources, June 2000, p.44, Fig 4.3 Average Scheme Inflows and Diversions

¹⁰ Simon Williams DPI Water email 2.5.17

Whilst the current sites for delivery of SRMIF to the upper Snowy River provide for a greater length of the river to receive water, they are unable to deliver the target volume of SMRIF as designated in the SWL. (They also still fail to provide connectivity to the entire length of the upper Snowy as environmental flows are not released from either Guthega or Island Bend Dams). The montane riverine works designated in the SWL (i.e. on Perisher and Rams Flat Creeks below Guthega Dam; and on the Gungarlin River below Island Bend Dam) must be completed to enable the target volumes to be delivered.

An adaptive approach must be adopted which ensures that a combination of releases from the smaller flow streams higher up in the reaches are delivered as well as high volume releases from the larger Gungarlin River (MANF:100GL) and Perisher (MANF:41.9) and Rams Flat (MANF:4GL) Creeks.

This water year the total shortfall of SMRIF to the upper Snowy is 36.5GL.

8. The SMRIF targets must be delivered to the individual rivers identified in Schedule 3 Table 1, rather than treated as a single package of water.

Each year NSW DPI Water/SHL variously distributes the SMRIF annual allocation between five rivers (i.e. two sections of upper Snowy River, and the Geehi, Goodradigbee, and Upper Murrumbidgee Rivers) rather than delivering the designated target flows to individual rivers listed in the SWL SMRIF schedule.

The SWL Schedule Three Table One Snowy Montane Rivers Increased Flows refers to releases to two sections of the upper Snowy River above Jindabyne dam as well as to the Geehi.River, Goodradigbee River and upper Murrumbidgee River. However instead of delivering the target flows of individual rivers (including the two sections of the upper Snowy) NSW DPI Water/SHL treats the total annual allocation of SMRIF as a single bucket of water which they differentially distribute each year. As a consequence the major portion of SMRIF continues to be released into the Upper Murrumbidgee from Tantangra Dam to the detriment of sections of the upper Snowy River in Kosciuszko National Park which remain dry or only receive minimal flows.

9. Snowy Montane Rivers Increased flows from Tantangra Dam

The SWL (and Murrumbidge Water Sharing Plans) must be amended to protect downstream delivery of SMRIF released from Tantangra Dam.

SMRIF released from Tantangra Dam into the upper Murrumbidgee River must not be diverted at Angle Crossing to Googong Dam as part of ACT water supply entitlements.

In 2010 following first five-year review the SWL (Schedule Four, Water Release Requirements) was varied to include a new clause:

Clause 12A Releases from Tantangra Dam.

Clause 12A.1 Licensee to make releases from Tantangra Dam

Clause 12A.2Accounting for Tantangra Riparian Release

This new clause determined that the Licensee must release from Tantangra Dam up to the lesser of: 83mg/d; or the inflow into Tantangra Reservoir, to maintain a flow of 32mg/d in the Murrumbidgee River at Mittagang Crossing; and that the water released was to be accounted for as base passing flow into the Upper Murrumbidgee River.

The SWIOID¹¹ defines the base passing flow of the Upper Murrumbidgee from Tantangra Dam as 2GL/yr. This is equivalent to 5.47ML/d.

In comparison 83ML/d is equivalent to 30.29GL/yr. This is the same volume as the SMRIF to be released from Tantangra to the upper Murrumbidgee in 2017-18.

In effect the SWL amendment to release up to 83Mgl/d from Tantangra Dam, redefined the Upper Murrumbidgee base passing flow to a volume equivalent to the 2009/10 target increased flow¹² plus original base passing flow as identified in the SWIOID.

Was the SWL varied to ensure that a higher volume SMRIF could be released to deliver ACTEW AGL's high security licence volumes stored in the Snowy Scheme and/or to increase the reliability of diversions in general from the upper Murrumbidgee at Angle Crossing to Googong Dam for the ACT water supply?

Is this the reason that SMRIF are not being delivered to sections of the upper Snowy River in compliance with the SWL Schedule Three, Table One?

10. The commitment by the three shareholder governments under the Heads of Agreement (2000) and SWIOID (2002) to deliver up to 28% to the Snowy River post-2012 must be acted upon.

In 1996 the Expert Panel report identified 28%MANF as the minimum environmental flow required for the Snowy River below Jindabyne Dam. The intergovernmental agreements of 2000 and 2002 agreed to fund water savings up to 21% MANF to the Snowy below Jindabyne by 2012, with an unfunded commitment to returning 28% MANF post-2012.

By 2015 Water for Rivers had acquired 212GL in water savings entitlements for the Snowy River (and 70GL for the River Murray). The 212GL entitlement (plus total base passing flow) is equivalent to 21% MANF. However due to the fact that approximately half the entitlements are low reliability or general security entitlements which on average receive low allocations these entitlements deliver very little real water to the Snowy except in very wet years. As a consequence the Snowy River below Jindabyne Dam will receive on average only approx. 15% MANF or less. This is a very poor environmental outcome for any river.

The final 7% of legislated flows must be delivered to help restore the Snowy River. It is imperative therefore that the three government shareholders of Snowy Hydro Ltd use this period of the first ten-year review to initiate negotiations to obtain the final 7% and commence negotiations with SHL regarding the compensation that will be owed (according to the Heads of Agreement) for lost generation capacity.

¹¹ SWIOID, 2002, Definitions 1.1 (6), (b)

¹² Snowy Water Licence, 2011, Schedule 3, Table one. The 2009/10 Water Year target Snowy Montane Rivers Increased Flow for the upper Murrumbidgee is 27GL/yr.

11. The SWL must be integrated with Murray Darling Basin Plan.

The Commonwealth Water Act requires the Basin Plan to identify Sustainable Diversion Limits (SDLs) for all Basin water resources. The Snowy Scheme contributes more than 2000GL/yr of high reliability water to the MDB (approx. half that volume is contributed by the Snowy River catchment alone) yet there are no SDLs identified for any of the 12 rivers and 71 creeks diverted by the Snowy Scheme. In fact there are many streams and rivers in the Snowy Scheme including the Eucumbene River (once referred to as the east branch of the Snowy River) that still receive NO environmental flow at all. In addition SDLs identified in the Basin Plan for the naturally westerly flowing rivers are actually capped by the Snowy Water Licence.

To maintain the legislative illusion that the Snowy Scheme has no connection with MDB is a strategic failure of water management planning and perpetuates the unsustainable exploitation of Snowy Scheme Rivers. It also poses huge risks to the MDB in that the impact of climate change on the hitherto reliable water supply of the Snowy Scheme catchments is not factored into MDB water resource planning. The Commonwealth Water Act requires the Basin Plan to consider the impact of climate change on all its water resources. However the Snowy Scheme under the current SWL operates as a legislative and environmental black hole. This is a major failure of water governance by the three shareholder governments.

12. The SWL must be amended to permit the Burungabugge and Gungarlin Rivers to flow freely forever.

A few weeks ago a mechanical failure in the Burungabuggee diversion shaft which diverts the aqueducted waters of the Burungabugge and Gungarlin Rivers and Moss Creek to the Snowy-Eucumbene tunnel resulted in SHL opening the weirs on these two major rivers allowing them to flow down their natural course to the Snowy River below Island Bend Dam for the first time in 50 years.

Repairs undertaken within the 100m deep diversion shaft will be extraordinarily expensive and may require draining of the Snowy-Eucumbene tunnel which directs flows between Island Bend Dam and Eucumbene Dam.

Gippsland Environment Group strongly recommends that these two rivers remain permanently free flowing. At present they are the only two rivers in the whole Snowy River catchment in Kosciuszko National Park in which the connectivity between the snowmelt headwaters and the Snowy River has been restored. This is an incredible environmental sight. The waters flow down into Jindabyne Dam so they can still be pumped back up to Island bend Dam for diversion.

An agreement between the three shareholder governments made during the period of the Licence review to retain the Burungabugge and Gungarlin Rivers as free flowing rivers would be an historic act of environmental restoration and one welcomed by the majority of Australians.

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