

Joint IIO Submission

Murray-Darling Basin Plan Review

INTRODUCTION

This submission is on behalf of the Irrigation Infrastructure Operators in southern NSW (the IIOs).



Coleambally Irrigation
Co-Operative Limited (CICL)



Murrumbidgee
Irrigation (MI)



Murray Irrigation
Limited (MIL)

The IIOs thank the Murray-Darling Basin Authority (MDBA) for the opportunity to participate in the Basin Plan Review, and appreciate the efforts to consult with IIOs, communities, and other key stakeholders.

The evidence-base developed by the MDBA as part of the Basin Plan Review reflects the observations of those who live and work in the Basin: i.e. today's environment challenges cannot be solved by "just adding water".

As IIOs we agree now is the time for targeted environmental initiatives, with on-ground direct measures to tackle priority risks such as invasive species and habitat degradation, as well as to improve the delivery of environmental water, optimising the positive outcomes we are all keen to realise.

These are the solutions our environment needs, and they align with the issues highlighted in Basin Plan Review. This approach will protect the socio-economic wellbeing of Basin communities.

The path forward from here is clear: there are better solutions than removing productive water from regional communities and the IIOs support these solutions and working together with Governments and the MDBA to deliver better outcomes.

SUBMISSION CAPSTONE STATEMENT

*No further water from the consumptive pool is needed. We support the MDBA's view that future Basin Plan outcomes are best delivered by optimising the existing environmental water portfolio. Collectively, **the IIOs are uniquely placed to partner with the MDBA and Governments to deliver and contribute to this outcome across southern NSW.***

THE UNIQUE PARTNERSHIP OPPORTUNITY OFFERED BY THE IIOs

The IIOs have a critical role in supplying water from regulated river across the landscape to irrigation, environmental and stock, and domestic customers. They are at the centre of irrigation, and the related economic activity, environmental outcomes, and community development across southern NSW and are intrinsically connected to their local people and environment. They continue to support community resilience and ecological benefit under a changing climate and deliver significant value to the economy.

Each IIO is a nuanced business. Each IIO employs an integrated business model tailored to their operating environment - combining strategic, technical/engineering, community and environmental dimensions - to underpin the long-term viability, and reliability of their operations. These integrated approaches underpin regional socio-economic resilience, while enabling further, expanded support of Basin Plan environmental outcomes, and the broader objective of sustainable management and productive use of Australia's water resources. Due to the integrated models employed, the IIOs continue to reliably, effectively and efficiently deliver services in a world with less water and more variability.



The IIOs have a unique ability to partner with the MDBA and Governments to integrate and deliver Basin Plan policy and programs in their respective regions and communities through their delivery networks, location and proximity to high value natural assets, and human capability and experience.

The way each IIO does this differs. Each operates its network differently, with priorities set according to local issues and constraints, yet each can further support the delivery of environmental outcomes. Tailored, regionally based approaches to delivering Basin Plan outcomes can best optimise the existing environmental water portfolio to best achieve environmental outcomes efficiently and effectively.

This submission outlines how the IIOs can support the further optimisation of the environmental water portfolio and makes clear that further removal from the consumptive pool is not required or beneficial. Governments don't need to remove further water from the consumptive pool.



CICL CEO
Julian Speed

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MI CEO
Philip Holliday

A handwritten signature in black ink that reads "Philip Holliday".



MIL CEO
Ron McCalman

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Submission structure

This submission is structured around three delivery themes (Figure 1), each outlining how the IIOs are uniquely placed to partner with the MDBA and Governments to deliver future Basin Plan outcomes in ways the MDBA has highlighted throughout its *Discussion Paper*:

- (i) **efficient and effective** use of a maturing environmental water portfolio;
- (ii) embedding **equity** through more practical delivery; and
- (iii) enabling local leadership and **strong governance**.




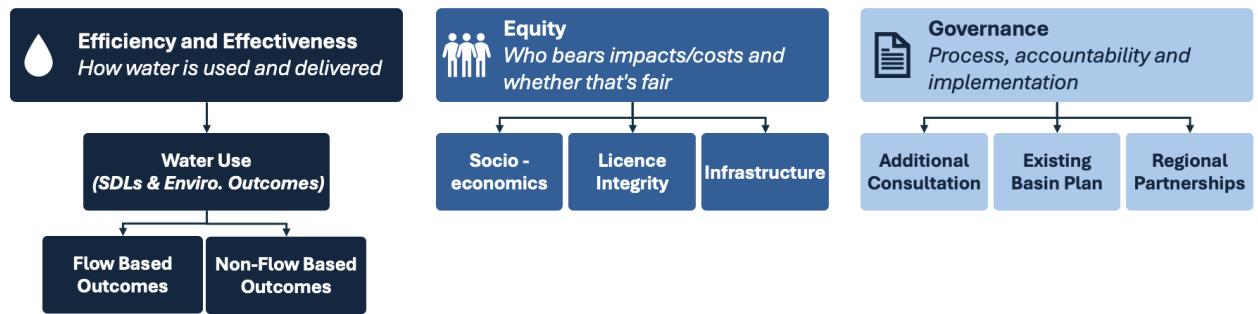
Delivery Theme	Summary
 Efficiency and Effectiveness	<i>How water is used and delivered</i>
 Equity	<i>Who bears impacts and costs, and whether that is fair</i>
 Governance	<i>Process, accountability and implementation</i>

Figure 1- Submission Structure





Water Use

RECOMMENDATIONS

1. MDBA and Basin Governments work with the IIOs to co-design regionally based, fit-for-purpose approaches, to optimise the existing environmental portfolio and enabling more efficient and effective achievement of Basin Plan outcomes across southern NSW.
2. This approach will mean the existing SDLs do not need to change, no further water recovery is required, and further adverse impacts on communities and economies are prevented.
3. All methods that achieve the targeted environmental outcome should have equal standing, and should be included in the pool of requirements for regional-based planners and operators to manage, facilitate and optimise, drawing on their tailored local knowledge (e.g. water volume is not the only legitimate approach to deliver targeted environmental outcomes)
4. Regulatory design of Basin Plan policy should enable the water sharing arrangements in each state to facilitate consumptive use up to legal limits and support innovative solutions to existing underuse.

POSITION

Riverina SDLs are in compliance and already reflect an ESLT

The Murrumbidgee and Murray SDLs are in compliance and the MDBA has assessed each as already reflecting an Environmentally Sustainable Level of Take (ESLT). This has been secured by reducing the consumptive pool, however the MDBA evidence base now confirms more than ‘just adding water’¹ is required to deliver the Basin Plan’s environmental outcomes. This is supported by Baumgartner et al (2020) noting “*while recovering water will provide good outcomes, as a sole intervention, it is not enough to deliver the desired environmental benefits of the reform*”.²

Environmental indicators and outcomes signify further water is not the solution

The balance has been struck. Currently, 72% of total Basin water is not diverted from the system and remains for environmental purposes, with only 28% utilised as part of the consumptive pool. In addition, the MDBA's own evidence base - including the 2025 Basin Plan Evaluation and Sustainable Rivers Audit – confirms, across southern NSW that:

- flow-based indicators are scoring positively (e.g. longitudinal connectivity)
- non flow-based indicators are scoring relatively poorly (e.g. native fish)

Notably, the evidence base confirms under the different Lines of Enquiry with increased water volume, outcomes do not significantly improve and non flow based actions appear to be a higher priority. Water volume is not the binding constraint on achieving environmental outcomes.

The evidence indicates water volume is a single component to achieving overall ecosystem improvements and targeted environmental outcomes. More efficient and effective approaches are available to optimise the existing environmental water portfolio and deliver targeted environmental outcomes, including those targeted to the indicators which are now scoring most poorly, and which cannot be addressed by ‘just adding water’.

¹ Basin Plan Evaluation Report, pg 4.

² Charles Sturt University ‘Ten complementary measures to assist with environmental watering programs in the Murray–Darling river system’ Australia (2020).

More efficient and effective approaches can optimise existing environmental water

The next iteration of water management must focus on optimising the existing pool to achieve the best outcomes. The focus should turn to better utilisation of the existing held environmental water (HEW) portfolio and planned environmental water (PEW) — not further reducing what remains in the consumptive pool.

Regionally based, fit for purpose approaches are proven to be more efficient and more effective at achieving Basin Plan Outcomes and should be adopted further to optimise our water resources and achieve Basin Plan outcomes with direct and measurable improvement.³ Approaches include:

- targeted/managed watering
- infrastructure-enabled inundation (works and measures)
- pest species management
- native fish-specific approaches
- water quality interventions
- riparian and catchment management

These approaches provide improved value for money, require no further investment in water recovery, support the Basin Plan delivering resilience and socio-economic objectives of the Basin Plan 2012 and *Water Act 2007* (Cth) (Water Act) and are more efficient and effective use of the existing environmental water.

These approaches are proven, ready-made solutions

The IIOs submit that these approaches ensure:

- the MDBA and Basin Governments further optimise Murray Darling Basin water management and use to achieve Basin Plan outcomes more efficiently and effectively
- the Murrumbidgee and Murray SDLs will no longer be at risk
- there is no need to reduce the SDLs or further water recovery to achieve Basin Plan outcomes
- Basin Plan implementation will remain within the existing regulatory design and be consistent with the objectives of the Water Act

EVIDENCE

- We support the evidence provided by the National Irrigators' Council (NIC) analysis of the MDBA's Initial SDL Assessments found 92% of outcomes did not change under the LOE2, including further water recovery.⁴ Further SDL reduction, or water recovery from the consumptive pool, would not mitigate environmental risks or improve the likelihood of outcomes being achieved, but would add material uncertainty for producers based on water availability and affordability.
- The 2025 Basin Plan Evaluation confirms water for the environment is essential but on its own likely not sufficient⁵ - water quality, riparian and floodplain management, pest control, instream habitat, river operations, and environmental water portfolio management are all crucial to achieve environmental outcomes.
- The 2025 Sustainable Rivers Audit shows flow-based indicators (longitudinal connectivity, bank full flows) scoring positively, confirming adequate water volumes.⁶ Non-flow indicators such as native fish score poorly, demonstrating additional water recovery would not improve outcomes.
- In a fiscally constrained environment, further water recovery delivers diminishing returns. Regionally-based, fit-for-purpose approaches would mean Murrumbidgee and Murray SDLs are no longer assessed as being at risk, negating any justification for further water recovery.

³ This is to continue operating within river operators' constraints and respecting licence integrity. See Section *Licence Integrity* for further detail.

⁴ National Irrigators Council (NIC) 'Response to Basin Plan Review Discussion Paper' <<https://www.irrigators.org.au/policy/murray-darling-basin-plan/2026-basin-plan-review/>> - accessed 30 April 2026.

⁵ MDBA, 'Basin Plan Evaluation Report', 4.

⁶ MDBA, '2025 Sustainable Rivers Audit', 11.



Flow-Based Indicators

RECOMMENDATION

1. The data and methodology used to by the MDBA to escalate flow-based indicator risk ratings beyond the headline assessments is provided to key stakeholders.

POSITION

The MDBA’s preliminary SDL assessments identified risks to flow and connectivity outcomes across southern NSW. Headline assessments rated these outcomes as already ‘likely being achieved’. Escalation occurred through additional internal MDBA analysis that has not been shared in detail or been tested by informed stakeholders. It is unclear how, and on what basis, this occurred and the IIOs request the MDBA outline this assessment process further. For example, for the NSW Murray SDL long-term monitoring and reporting of the ‘The Living Murray Initiative’ shows the Barmah Millewa Forest has been in good or excellent condition for the past 10 years - this is inconsistent with the ‘critical’ risk rating this site received under the MDBA’s preliminary SDL assessment. Delivery inabilities, not SDL volume, are identified as the key limiting factor - this is an operational problem the IIOs can help resolve, not a justification for further water recovery.

The IIOs submit outcomes for flows and connectivity are already likely being achieved — the case for further SDL reductions on the basis of flow indicators has not been established.

EVIDENCE

- The MDBA’s SDL assessments for the Murrumbidgee (SS15) and Murray (SS14) rates flows and connectivity as ‘likely being achieved’^{7,8} in the headline table — escalation to critical occurred through subsequent internal analysis.
- Living Murray monitoring data shows the Barmah Millewa Forest has been in good or excellent condition for the past decade, directly contradicting a critical risk rating for this site.
- The same pattern of unexplained escalation from headline ‘likely achieved’ to ‘critical’ appears across the Victorian Murray, Goulburn and SA Murray SDL assessments.
- The MDBA’s own assessment acknowledges that the SDL is one factor among many determining flow achievement of Basin Plan outcomes — delivery infrastructure and operational decisions are equally important levers.

⁷ MDBA ‘New South Wales Murray (SS14) SDL Assessment’, 1.

⁸ MDBA ‘New South Wales Murrumbidgee (SS15) SDL Assessment’, 1.



Non-Flow Based Indicators

RECOMMENDATIONS

1. No new native fish obligations should be introduced under the Basin Plan at this time — existing obligations are sufficient pending resolution of the carp problem.
2. Carp management should be prioritised as a prerequisite to achieving meaningful native fish outcomes through strategic, targeted watering events rather than broad flooding regimes that disproportionately benefit carp over native species.
3. Retain section 9.11 of the current Basin Plan, specifying water quality targets are not mandatory.

POSITION

The MDBA's SDL risk assessments assume a 'domino effect' in which failure to deliver overbank flows leads directly to poor outcomes for non-flow or pattern based indicators, including both native fish and water quality outcomes. The IIOs dispute this assumed causal logic on both counts.

Native fish outcomes will be best achieved following carp eradication

The MDBA's assumption that native fish and water quality outcomes depend on flow driven events is not supported by the evidence. Carp - approximately 90% of fish biomass across the Basin - are the primary driver of poor native fish outcomes, and flow-driven approaches have consistently failed to deliver water quality improvements. The MDBA's assumption that poor native fish outcomes are driven by altered flow regimes is not supported by its own data - this causal link should be tested transparently before any policy response is imposed. Until significant presence of carp is addressed, additional environmental water obligations for native fish will deliver minimal benefit. Strategic and targeted environmental water delivery - right amount, right time, right place - provides better conditions for native fish than natural flooding events, which disproportionately benefit carp.

Water quality targets should remain as not mandatory

The IIOs support the MDBA's finding: *the Basin Plan on its own cannot prevent and manage water quality problems* (Discussion Paper, page 64). Recognising the MDBA has acknowledged the limits of the Basin Plan in influencing water quality outcomes, water quality targets should remain as not mandatory. Water quality issues should be addressed at the point source, not diluted after they occur. Any requirement to meet water quality targets using dilution pulses would effectively draw water from the consumptive pool, in effect reducing the SDL without formal scrutiny.

EVIDENCE

- The 2025 Sustainable Rivers Audit shows native fish outcomes scoring poorly across the Basin despite significant environmental water delivery, including not improving under LOE2 (full Basin Plan Implementation) — confirming water volume is not the binding constraint.
- Targeted flow events timed to native fish breeding cycles produce better outcomes than broad flooding regimes, which create conditions that favour carp recruitment over native species.
- The MDBA has acknowledged in its Discussion Paper that the Basin Plan has limited influence over water quality outcomes



Socio-Economic Impacts

RECOMMENDATIONS

1. Governments and the MDBA decision making should explicitly demonstrate how it has applied equal weighting to socio-economic objectives and obligations under the Water Act.
2. As water entitlements continue to exit the consumptive pool, Governments consider the socio-economic impacts on IIOs, remaining irrigators and communities when setting policy to avoid negative outcomes.⁹
3. A Regulatory Impact Statement (RIS) is undertaken as part of the Basin Plan Review and applied at appropriate scales of assessment to ensure localised impacts on water-dependent communities are not masked by broader regional or Basin-wide data.
4. The MDBA and Governments do not use Gross Value of Production (GVP) as an indicator for agricultural profitability or socio-economic resilience, but rather conduct net margin analysis when conducting future socio-economic assessments.

POSITION

Water recovery has achieved, or at least put the Basin in a position to now achieve, the Basin Plan's triple-bottom-line based objectives. Remaining Basin Plan outcomes should be delivered via other means and measures not eroding the socio-economic fabric of the regional, water dependent communities of the Murray Darling Basin.

Less water in the consumptive pool has significant impacts on communities, IIOs and irrigators

As water entitlements leave the consumptive pool, the remaining irrigators bear a higher cost base and efficiency gains already made mean there is limited capacity to absorb further impacts.

The Australian Bureau of Agricultural and Resource Economics and Science (ABARES) report on "*The impacts of further water recovery in the southern Murray–Darling Basin*" illustrates that under a 225GL buyback scenario in the southern Basin, water allocation prices will increase by an estimated 10%. Water use under the same scenario will reduce by 133GL per year and production will decrease by \$111 million per year¹⁰. This is a significant impact to the water dependent communities, the IIOs and the remaining irrigators that rely on the productive outputs of the irrigation sector.

Further water efficiency gains in NSW are increasingly constrained by improvements to date, and whilst possible they are unlikely to material, rapid or costless.¹¹ Any further water efficiency gains will require significant capital, technical capability and risk tolerance and may deliver diminishing returns compared to historic gains.¹² Ultimately, this limits the extent to which irrigators can offset high water changes through on farm efficiency improvements.¹³

Productivity improvements alone cannot continue to offset the structural pressures facing Basin industries and communities resulting from water recovery. IIO networks are critical infrastructure for regional agricultural economies. Continued decline in network utilisation poses a significant risk to communities and downstream industries that is not adequately captured in current Basin-wide assessments. Future planning should recognise that IIO networks serve a growing environmental water delivery function, adding further complexity to their operational and economic role.

⁹ See Water Use section for justification and evidence as to why water recovery should cease immediately.

¹⁰ ABARES, 'The impacts of further water recovery in the southern Murray–Darling Basin', 2024.

¹¹ Ricardo 2026, IPART: 2025-26 review of WaterNSW's prices, report prepared for IPART, pg 51.

¹² Ibid pg 52.

¹³ Ibid.

The communities the IIOs operate in are vulnerable to further water recovery

The Baseline relative community vulnerability and adaptive capacity—Murray-Darling Basin - A focus on irrigation in agriculture report prepared by ABARES and Aither in June 2024 shows the vulnerability of different regional communities to the remaining water recovery required under the Basin Plan.

The footprint of the three IIOs span eight Local Government Areas. Table 1 shows community sensitivity. Those with a ranking closer to 1 have the highest community sensitivity to changes in water availability. This shows that Carrathool and Murrumbidgee are amongst the most sensitive. The adaptive capacity score defines the positive resources and capacities available within a community to adapt and reduce loss and harm. A score closer to 0 means there are lower levels of adaptive capacity. All of the LGAs in this table are on the lower end of the adaptive capacity scores (less than 0.5). Viewing the vulnerability baseline with a ranking closer to 1 shows a high level of vulnerability across most LGAs.

Table 1 - Impact to LGAs from changes in water availability

LGA	Vulnerability baseline	Sensitivity	Adaptive Capacity
Berrigan Shire Council	0.65	0.62	0.28
Griffith City Council	0.72	0.71	0.26
Carrathool Shire Council	1.00	1.00	0.08
Edward River Council	0.63	0.62	0.35
Leeton Shire Council	0.66	0.65	0.30
Narrandera Shire Council	0.50	0.42	0.33
Murray River Council	0.64	0.63	0.31
Murrumbidgee Council	0.89	0.86	0.13

Source: ABARES & Aither June 2024¹⁴

Environmental outcomes can be achieved without compromising the socio-economic outcomes of Basin communities

The IIOs ability to support climate change resilient agriculture as well as that of the communities relying on the economic outputs of productive irrigation operations does not need to be compromised to achieve environmental outcomes. The MDBA and Basin Governments can work with the IIOs to co-design approaches to achieve environmental outcomes that also ensure the long-term sustainability of Basin communities, including supporting the resilience of annual farming systems

EVIDENCE

- Efficiency gains already made by irrigators mean there is limited remaining capacity to absorb further structural pressures resulting from water recovery — the system is approaching its limits.
- Basin-wide economic analysis to date masks the concentrated, localised impacts on smaller, water-dependent communities — community-scale analysis consistently shows more severe impacts than regional averages suggest.
- The resilience and sustainability of irrigated agriculture — which underpins the Basin Plan’s own triple-bottom-line objectives — is at risk if additional water is removed from the consumptive pool without adequate socio-economic assessment and mitigation.
- GVP is a measure of total output (gross revenue generated by production) and does not deduct productions costs, therefore masking profitability, margins or cash flow. GVP is an inaccurate metric for financial performance at the enterprise level compared to net margin analysis.¹⁵

¹⁴ ABARES & Aither, 'Baseline relative community vulnerability and adaptive capacity—Murray-Darling Basin A focus on irrigation in agriculture' June 2024.

¹⁵ Ibid pg 55.





License Integrity

RECOMMENDATIONS

1. Existing Basin Plan content that protects licence integrity should be retained and strengthened in the Basin Plan.
2. Any future programs or Basin Plan obligations should not reduce the water available to the consumptive pool through increased system losses, and the reliability of general security entitlements should be retained or improved.
3. Protections for the delivery requirements and obligations of IIOs should be in place - flow pattern obligations should never risk IIOs' ability to deliver water to customers.

POSITION

IIOs have legal obligations to deliver water to customers. Water Access Licence reliability is fundamental to the long-term investment decisions of irrigators and the communities that depend on them. Existing Basin Plan protections for licence integrity should be retained and strengthened.

EVIDENCE

- Environmental water use and delivery actions that increase system losses impose an effective, hidden reduction in consumptive water availability that falls outside the formal SDL framework and therefore escapes the scrutiny and oversight that SDL changes receive.
- IIOs and their customers have made long-term investment decisions based on the reliability of their entitlements — changes that undermine this reliability without compensation or due process are contrary to the Water Act's objectives.



Sustainable Infrastructure

RECOMMENDATIONS

1. The Basin Plan delivers benefits to the broader Australian community, not just water users. Accordingly, any further infrastructure investment in the Basin should be funded in full by Governments, rather than recovered from the water users.
2. A comprehensive public asset management strategy should be adopted to secure sustainable infrastructure across the Basin, with funding cost-shares revisited to reflect contemporary southern Basin water use and the multiple beneficiaries of shared infrastructure.
3. Where necessary, jurisdictions should reconsider their current method for passing on infrastructure costs, to ensure they are shared equitably among all beneficiaries, rather than being predominantly concentrated on a narrow and reducing irrigation-based sector.

POSITION

IIOs support in-principle the MDBA's view fit-for-purpose infrastructure, in operable condition is essential to water management in the Murray-Darling Basin and delivery of the Basin Plan. The critical question is who pays and in what shares.

Built by governments and underpinning regional development through regulated river systems, this infrastructure delivers significant ancillary benefits well beyond irrigation. With non-irrigator use growing and the irrigator base shrinking, continuing to fund maintenance and refurbishment from an ever-decreasing number of water users is unsustainable. This is timely and necessary to ensure the system is funded on a fair and sustainable basis.

The IIOs and other private irrigation infrastructure operators have established sustainable infrastructure management programs. The primary challenge is public infrastructure, which has no clear asset management plan, serves multiple uses, and is difficult to attribute and fund. Upstream reliance on major river infrastructure is substantial. A comprehensive, appropriately funded asset management plan is required to secure the long-term reliability of the regulated river system.

EVIDENCE

- There is now significant non-irrigator use of water and infrastructure assets — multiple uses mean multiple beneficiaries, and the cost burden should be shared accordingly.
- The IIOs and other private irrigation infrastructure operators have established sustainable infrastructure management programs at their own cost — the primary unfunded challenge is public infrastructure.
- Public infrastructure has no clear asset management plan, serves multiple uses that are difficult to attribute, and is not being funded at a level commensurate with its strategic importance to Basin operations. It is important that uses are properly attributed, so that cost sharing is determined in a fair way.



Additional Consultation

RECOMMENDATIONS

1. Direct and transparent engagement with IIOs, peak industry bodies, First Nations communities, environmental stakeholders and local governments as priority stakeholders is conducted once a view on proposed Basin Plan amendments is formed.
2. The consultation addresses what changes are being considered for recommendation to the Minister, as well as what key elements should remain unchanged, and why — supported by evidence.

POSITION

It is the view of the IIOs that the MDBA should conduct direct, transparent consultation on any proposed Basin Plan amendments before advice is provided to the Minister. The key point of influence on future Basin Plan policy is the MDBA’s proposal and advice to the Commonwealth Water Minister, and consultation should be leveraged to inform this advice.

The Discussion Paper does not include the MDBA’s view on Basin Plan updates. It does not indicate whether the MDBA believes the Basin Plan should change, and if so, what specific changes are proposed. Without this, the IIOs cannot adequately assess the impacts of final SDL Assessments, and the associated economic and community impacts in their local area. The occurrence, approach, procedural relevance and adequacy of any future consultation process is uncertain and should be resolved before the Review proceeds to final Ministerial recommendations.

It is unclear whether future engagement is built into the process, and what weight it holds over outcomes of the Basin Plan Review. A proposed ‘What We Heard’ report after initial consultation is an inadequate substitute for genuine and timely stakeholder consultation.

EVIDENCE

- Based on the Discussion Paper’s content and the current lack of clarity regarding future consultation, IIOs are deeply concerned the Review could negatively impact future water use in their footprints, and possibly do so without directly contributing to the Basin Plan objectives.
- Without specificity on proposed amendments, IIOs cannot assess the impact on their operational footprint or identify the pathways available to respond effectively.



Remaining Basin Plan Implementation

RECOMMENDATIONS

1. The SDLs are to remain after MDBA completes the proposed forthcoming reconciliation, and no further water recovery is no longer needed.
2. Provide evidence how each SDL risk assessment conclusion was reached.
3. Undertake an updated Basin Plan RIS to ensure stakeholders understand the relative costs and benefits associated with delivering the MDBA’s definition of ‘full Basin Plan implementation’.

POSITION

The Discussion Paper has a limited relationship with the existing Basin Plan and does not comprehensively address elements that should remain unchanged. Line of Enquiry 2 assumes a fully implemented Basin Plan (including addressing a forecast SDLAM shortfall of 300GL) without any socio-economic analysis or justification for doing so. The diminishing returns of further water recovery should be transparently assessed before this approach is pursued.

In 2012 it was assumed that 2750GL of surface water recovery was required. Present data demonstrates the existing environmental water portfolio and PEW can be optimised to deliver the same environmental outcomes without further costly water recovery. Better value-for-money mechanisms are available, and have been demonstrated as effective to achieve environmental outcomes — these should be pursued before any further water recovery is considered (See Water Use section on page)

The MDBA should communicate a comprehensive position on what it intends to retain, change and deliver under the existing Basin Plan. As evidenced throughout the submission, the 2750GL target is not required to deliver targeted environmental outcomes - cost-effective approaches are available.

EVIDENCE

- The 2025 Basin Plan Evaluation confirms the environmental outcomes originally assumed to flow from water recovery alone are more complex to achieve — the water recovery program is not delivering the assumed returns at the forecast cost.
- The SDLAM forecast shortfall cannot be addressed through water recovery alone — alternative mechanisms should be explicitly identified, costed, and committed to by government.
- A RIS was undertaken in 2012 when the Basin Plan was established; a comparable assessment is now warranted to determine whether the regulatory settings remain fit for purpose given what has been learned through Basin Plan implementation to date.
- Community-scale analysis is essential — Basin-wide averages mask the concentrated, localised impacts on smaller irrigation-dependent communities that bear a disproportionate share of the costs of water recovery.



Regional Partnerships

RECOMMENDATIONS

1. The Basin Plan should facilitate and support the expansion of partnerships with IIOs and other regional and community stakeholders to develop, iterate and refine detailed and regionally appropriate response options.

POSITION

Regional and community-level partnerships represent the most efficient and effective mechanism for achieving environmental outcomes at the landscape scale — they leverage local knowledge, existing infrastructure, and relationships that centralised delivery cannot replicate. The Basin Plan should facilitate and incentivise these partnerships — not constrain them.

Voluntary partnerships between IIOs and environmental water holders have demonstrated the ability to reach a broader range of ecological assets across the landscape, more efficiently and effectively than top-down delivery approaches. The next iteration of Basin water management should formally recognise and support this model, moving from centralised direction toward collaborative, regionally informed delivery.

These partnerships represent an emerging contemporised paradigm of best-practice water management that should be central to Basin Plan 2.0 (Freak et al. 2022). Further consultation at the valley level is required to develop detailed, regionally-appropriate response options — this consultation should be structured, well-resourced, and genuinely responsive to what it hears.

EVIDENCE

- IIO partnerships with environmental water holders have been shown to deliver water to a broader range of ecological assets more efficiently and effectively than conventional delivery approaches, with lower transaction costs and better on-ground outcomes.
- Regional operators have tailored, deep experience and knowledge of their local catchments and valleys — this expertise is a significant and underutilised asset in Basin Plan delivery that the framework should formally harness.
- The 2025 Basin Plan Evaluation recognises that complementary measures and regional collaboration are crucial to achieving environmental outcomes — the Basin Plan should reflect this finding in its operational frameworks.
- Improved regional-level engagement to optimise water delivery within the constraints of river operations would support more efficient and effective environmental outcomes at lower cost to the Commonwealth and Basin governments.
- Freak et al. (2022)¹⁶ outline that successful partnerships between IIOs, landholders and environmental water holders already exist across the Basin, but remain little known, absent from key policy frameworks, and undocumented in theoretical notions of best-practice water management at the Basin scale.

¹⁶ Christine Freak, Jennifer McLeod, Keith Thompson, Linda Christesen & Claire Miller (2022) 'Contemporising best practice water management: lessons from the Murray-Darling Basin on participatory water management in a mosaiced landscape', Australasian Journal of Water Resources