



PO Box 216, DUBBO NSW 2830
ph 0428 817 282
email inlandriversnetwork@gmail.com
web inlandriversnetwork.org
ABN 34 373 750 383

Murray-Darling Basin Authority
GPO Box 1801
Canberra City ACT 2601
BPRsubmissions@mdba.gov.au

Friday 1 May 2026

Submission Murray-Darling Basin Plan Review

Introduction

The Inland Rivers Network (“IRN”) is a coalition of environment groups and individuals concerned about the degradation of the rivers, wetlands and groundwaters of the Murray-Darling Basin. It has been advocating for the conservation of rivers, wetlands and groundwater in the Murray-Darling Basin since 1991.

Member groups include the Australian Conservation Foundation; the Nature Conservation Council of NSW; the National Parks Association of NSW; Friends of the Earth; Central West Environment Council; and Healthy Rivers Dubbo.

We welcome the opportunity to provide recommendations to the Murray-Darling Basin Authority (MDBA) to ensure that the second Basin Plan builds on the successes of the first and addresses key gaps and shortfalls.

Recommendations

1. Embed robust climate science and ecological evidence into Basin planning
 - Recalculate all SDLs to meet the mandatory Environmentally Sustainable Level of Take (ESLT)
2. Recognise obligations to Aboriginal People including allocation of cultural water in each water source
3. Simplify the Basin Plan

- Remake all WRPs through a template to provide consistency, connectivity between and within water sources and updated SDLs
 - Implement a percentage reduction across all water licences for equitable achievement of new SDLs
 - Enforce jurisdictional accountability
 - Fast track the constraints program
 - Remove the SDLAM
4. Address high risk poor water quality identified in WRP risk assessments
 5. Support Basin communities through a Transition Fund, focus on water use efficiency and equitable water recovery.

Key Issues

1. Embed robust climate science and ecological evidence

Australia’s recent experience makes it clear that the Murray–Darling Basin Plan must explicitly incorporate contemporary and forward-looking climate modelling if it is to remain effective.

There is substantial scientific evidence that pressures are contributing to widespread environmental decline across the Basin. Long-term research by the CSIRO shows that **many ecological systems in the Basin are already in decline**, driven by the combined effects of consumptive water use and highly variable flows. This includes degradation of riverine habitats, reduced floodplain connectivity, and declining ecosystem function. (https://www.csiro.au/en/research/natural-environment/water/Murray-Darling-Basin?utm_source=chatgpt.com)

Key ecological indicators confirm this downward trend. The Murray–Darling Basin Authority’s 2025 Sustainable Rivers Audit found that while short-term wet periods can produce temporary recovery, **long-term trends remain negative**, particularly for waterbird populations. Waterbird abundance and habitat availability have **declined significantly since the 1980s**, with current conditions only rated as “fair” despite recent floods. Lower population resilience and reduced breeding success reflect the loss of regular flooding that these ecosystems depend on. (https://mdba-preprod-origin.ddev.mdba.gov.au/publications-and-data/publications/summary-2025-sustainable-rivers-audit?utm_source=chatgpt.com)

More broadly, scientific evidence shows that **connectivity between rivers and floodplains—a critical driver of ecosystem health—has been substantially reduced**, limiting the ability of wetlands, native fish, and vegetation communities to recover (https://www.csiro.au/en/research/natural-environment/water/murray-darling-basin/ecosystem-function?utm_source=chatgpt.com). Historical over-extraction and river regulation have also contributed to **salinity, water quality decline, invasive species spread, and overall biodiversity loss** across the Basin. (https://www.csiro.au/en/news/all/articles/2018/april/murray-darling-basin?utm_source=chatgpt.com)

These environmental declines are occurring alongside—and are being intensified by—climate change. The latest assessments confirm that the Basin is becoming hotter and drier, with **declining runoff, reduced groundwater recharge, and more frequent and severe droughts** projected into the future (https://www.csiro.au/en/research/natural-environment/water/murray-darling-basin/murray-darling-basin-sustainable-yields?utm_source=chatgpt.com). This compounds existing stress on ecosystems that are already operating close to critical thresholds.

Crucially, this body of evidence demonstrates that the traditional “stationary” approach to water planning—based on historical climate records—is no longer valid. The assumption that past extremes define future limits has been overtaken by evidence showing a **non-stationary and rapidly changing climate system, alongside ongoing ecological decline**.

The implication for policy is clear: the Basin Plan must transition to a **dynamic, risk-based framework grounded in climate modelling and ecological thresholds**. This requires integrating the latest hydroclimatic projections, explicitly accounting for declining water availability and environmental condition, and enabling adaptive management that can respond to emerging conditions.

Without embedding robust climate science and ecological evidence into its foundations, the Murray–Darling Basin Plan risks **systematically underestimating both future water scarcity and ongoing environmental degradation**, leaving communities, ecosystems, and industries exposed to escalating and compounding climate risks.

2. Basin Plan must recognise obligations to Aboriginal People

There must be stronger obligations within Basin Plan #2 based on Aboriginal Rights under the Native Title Act (which recognises Aboriginal and Torres Strait Islander rights to access and use water for traditional, spiritual, and domestic purposes without a licence), and the UN declaration of the Rights of Indigenous People (UNDRIP) including the principles of Free Prior and Informed Consent.

Allocation of cultural water in each water source must be a priority.

3. Simplify the Basin Plan

3.1 Water Resource Plans (WRP)

WRPs need to be simplified through a template process to provide planning based on consistency and connectivity across the Basin including longitudinal, lateral and vertical connectivity. SDLs for all WRP areas must be reviewed transparently with peer reviewed analysis to ensure that the Water Act 2007 objective of achieving an Environmentally Sustainable Level of Take (ESLT) is met. Cultural flows must be identified in each WRP.

The simplified WRPs should include rules that pause diversions if flow requirements for priority water needs in the particular catchment and downstream catchment are not being met (as suggested by the Wentworth Group). These flow requirements should include operational

water requirements, critical human and wildlife needs, cultural needs, town water supply, stock and domestic water supply and sufficient water to maintain adequate water quality.

Accreditation of Water Resource Plans should continue to be required. Funding to States under the Basin Plan should depend in part on commitments being made in the plans.

3.2 Equity in process for water recovery

The simplest and most equitable way to return water from over extraction to achieve new SDLs is to identify a percentage reduction across all licences within each water source. This spreads the social and economic impact equally across all communities and allows for a clearly defined transition process. This method of achieving SDLs will alleviate the current social anxiety caused by the arbitrary water buyback program and perceived sense of social decline.

IRN does not support the perception that buying back water has a major socio-economic downside. The benefits of increased flow volumes, better connectivity, improved timing and water quality must be recognised. The Basin Plan must acknowledge the socio-economic benefits of a healthy river system.

Support for regional communities is outlined in Issue 5.

3.3 Jurisdictional accountability

Failures to achieve outcomes in Basin Plan #1 (e.g. full SDL recovery, removing constraints to delivery of recovered water for river health) are an indication of a lack of enforceable management measures within the Plan.

A defined dispute resolution system should be developed that can be used to address “roadblock issues” thus ensuring the progress of the Plan is not held to ransom by vested interests. Commonwealth funding provided to Basin States for water reform should be tied to delivery of agreed commitments. Where states fail to meet agreed milestones, standards or outcomes, the Commonwealth should have the power to impose consequences, including withholding, reducing or reallocating implementation payments until deficiencies are addressed

Basin Plan #2 must include robust, independent and publicly transparent auditing framework for Basin water accounting.

3.4 Fast track the constraints program

The potential of recovered water to achieve improved ecosystem health and ecological function will not be achieved until the identified constraints to delivery of river health water are removed. This outcome must be prioritised in Basin Plan #2.

3.5 Remove the SDL Adjustment Mechanism (SDLAM)

The SLDAM is a failed planning process that has caused increased damage to the environmental health of river systems. This mechanism should be removed from the Basin Plan so that a clear outcome can be achieved through direct water recovery not through expensive, damaging and unachievable infrastructure projects.

The concept of ‘ecological equivalence’ is poorly designed and fails to achieve the necessary outcomes needed for a healthy, sustainable and resilient riverine ecosystem.

SDLAM has not only been an unsuccessful program but has diverted millions of dollars that could have been put to far better use.

Basin Plan #2 should have a mechanism to provide financial assistance for works that directly assist recovery of ecosystems or ecological processes, such as removal of weirs that cause significant environmental harm (e.g. by replacing flowing habitats needed by native fish with lentic habitats suiting carp; increasing water quality issues, evaporation during droughts and the volumes of flow needed to re-connect rivers and fish populations). This mechanism should neither be a substitute for recovering water nor a means of funding infrastructure that is complicated or only partially addresses environmental harms, such as adding gates to weirs or adding fishways to weirs that only benefit neighbours not essential public needs.

4. Address poor Water Quality

Current WRPs have included a risk analysis of water quality across all water sources. These assessments are based on levels of turbidity, total nitrogen, total phosphorous, pH, dissolved oxygen and salinity. The risk of poor water quality to ecosystem health, critical human needs and to industry were assessed in the WRP reports.

The identified high risk areas must be prioritised to understand the cause of poor water quality with key actions outlined to address the issue. These actions must be resourced and implemented. Pausing upstream diversions of flow, as proposed in 3.1 above, should be one of the actions.

The significance of good water quality for human health through drinking water supplies and for a healthy river ecology supporting native species populations should be a high priority. Improved town water supply for priority Basin towns should include off-river water storage and appropriate water treatment. Dependence on rivers as reservoirs should be reduced not increased.

5. Support Basin communities

Downstream communities, First Nations people and industries relying on a healthy river system must be given equivalent consideration in all socio-economic analysis. The current bias towards the irrigation industry within socio-economic analysis must be addressed.

The economic and social costs of loss of water to downstream economies, health and well-being and cultural values is a key issue. The value of returning more water for ecosystem function and downstream socio-economic benefits, including improved water quality, must be included in economic assessment.

A focus on more efficient water use within the irrigation industry should be part of a Basin Transition Fund to support regional communities. The development of new and sustainable industries, cultural enterprises, environmental innovations and improved local water security is essential. Structural support through a planned and equitable transition, will improve

communities capacity to adapt to climate change and to the urgently needed return to an environmentally sustainable level of take.

The proposal for an equitable reduction in water availability, as outlined at Issue 3.2 will enable a smoother transition towards an ESLT under Basin Plan #2.

Conclusion

IRN supports achieving an Environmentally Sustainable Level of Take that is based on ecological evidence. We support the more detailed submissions that explain this mandatory requirement and how to apply this evidence. (eg Wentworth Group, Murray-Darling Conservation Alliance, Lifeblood Alliance)

The recommendations we propose should be included in a Basin Plan that focusses on achieving healthy rivers and environmental sustainability outcomes.

For more information about this submission please contact:

Bev Smiles

President of Inland Rivers Network

inlandriversnetwork@gmail.com

0428 817 282