

NSW Government submission – Interim Report

Productivity Commission’s 2023 inquiry into the effectiveness and implementation of the Basin Plan (2012) and water resource plans

Executive summary

The NSW Government welcomes the release of the Productivity Commission’s *Murray-Darling Basin Plan: Implementation review 2023 – Interim report* and appreciates the opportunity to make a submission in response.

This submission builds on our Initial Submission made on 31 July 2023 and supplements our response to the information request from the Productivity Commission of 3 August 2023. We also direct the Productivity Commission to the NSW Government submission to the Environment and Communications Legislation Committee on the Australian Government’s *Water Amendment (Restoring Our Rivers) Bill 2023* (the Bill) made on 29 September 2023, a copy of which is attached.

The NSW Government supports the commitment of the Australian Government to deliver the Basin Plan in full. Many of the findings and recommendations of the Productivity Commission in the Interim Report are sound and sensible and reflect the findings of previous reviews into Basin Plan implementation, including that more time, money and flexibility are needed to deliver key components of the Basin Plan including supply, constraints relaxation and efficiency measure projects.

Resetting the Balance

Supply, constraints relaxation and efficiency measures

Our submissions to the Productivity Commission and Senate Committee make it clear that NSW supports the need for more time to deliver state-led projects and that with this additional time, supported by timely decisions from the Australian Government, we are confident that we can deliver more towards the 605 gigalitre (GL). This will enable good projects that deliver better outcomes for the environment and community to be implemented and reduce the need for additional water purchase by the Australian Government following reconciliation.

Similarly, with the 450 GL of additional environmental water, we are confident that with more time, we can deliver more towards this target. The NSW Government will continue to advocate that the

Australian Government recover water through means other than water buybacks, including investment in infrastructure and water efficiency and rules-based projects.

NSW supports greater transparency on progress of project delivery and Basin governments are currently discussing what additional accountability and assurance measures should be established to better hold States to account. Care is needed to ensure that these additional measures do not result in duplicated effort or undue administrative load for governments and stakeholders. The Australian Government needs to work with Basin States to ensure transparency measures are aligned to state workplans and priorities and that they are proportionate to the size of projects.

If the Productivity Commission is suggesting a three-month window for notification of project changes in the sense of preparing technical documents to provide guidance to the Murray-Darling Basin Authority (MDBA) on how a project is modelled at reconciliation, NSW considers this is too short. A three-month timeframe requirement would result in multiple notifications as project implementation progresses. Repeated changes to notifications would be a time-intensive exercise requiring input from staff already stretched in informing the Basin Plan evaluation in 2025 and review in 2026.

We note the Commission's indication that supply project withdrawal is a state responsibility. However, NSW notes that this is a responsibility of the Basin Officials Committee (BOC). It is unclear what would be achieved via unilateral action by the Australian Water Minister to withdraw projects, and this could undermine the established joint-government oversight by BOC and ultimate responsibility of proponent States to deliver projects. It risks premature decisions being made while viable options for amended projects are being explored such as the case for the Menindee Lakes Water Savings and Yanco Creek Offtake. Following agreement from the Murray-Darling Basin Ministerial Council in April 2021, the NSW Government rescoped the Menindee Lakes Water Savings and Yanco Creek Offtake projects to achieve broader ecological, social, cultural and economic outcomes – now known as the Better Baaka and Better Bidgee programs, respectively.

Our submissions to the Productivity Commission and Senate Committee acknowledge the fundamental importance of constraints relaxation projects to delivering Basin Plan outcomes and our support for these projects continuing beyond June 2024 and December 2026 if the Bill is passed. As noted in the Interim Report, relaxing constraints are required to enable environmental water managers to effectively use their water portfolios to sustain priority environmental assets throughout the Basin at the times, flow rates and locations where this water is needed.

Withdrawing constraints relaxation projects from the sustainable diversion limit adjustment mechanism (SDLAM) package as proposed by the Productivity Commission will cement the shortfall anticipated from these projects and could lead to premature additional water recovery. It could also lead to constraints projects being unfunded if changes are not made to the Water for the

Environment Special Account that allow for implementation of these projects beyond the proposed 31 December 2027 timeline. As set out in the Agreement reached between the Australian Government, NSW, Queensland, South Australia and the ACT to deliver the Basin Plan in full, the future of these projects and their ability to contribute to water recovery will be considered as part of the Basin Plan review in 2026. For NSW, it is imperative that protection of the Sustainable Diversion Limits (SDL) offset for these projects is considered as part of the Review.

Our constraints relaxation projects which are being delivered under the NSW Reconnecting River Country Program, prioritise environmental outcomes and are not just concerned with volumetric supply contributions. The publicly available quantitative Environmental Benefits and Risks Analysis demonstrates the environmental benefits associated with constraints relaxation under each flow option being considered.

NSW remains committed to bringing forward no-regrets opportunities that have community support and can be delivered by the Bill's proposed extended timeframe with funding made available by the Australian Government. These opportunities will allow us to continue to trial mitigation options at a smaller scale, pilot the collaborative design of policies, processes, and tools with affected landholders and deliver incremental improvements for floodplains while the broader Reconnecting River Country Program progresses over a longer timeframe. NSW is looking at ways to fast-track works in the Murrumbidgee River, noting that ongoing development of the Murray River program requires cooperation with the Victorian Government which has not signed up to the Agreement between all other Basin governments to deliver the Basin Plan in full.

The NSW Government continues to work with stakeholders to design and implement the Reconnecting River Country Program, with extensive engagement with landholders, First Nations communities, public land managers and regional community groups already carried out. We are currently developing a process to provide procedural fairness and equitable compensation outcomes to all affected landholders through our [Landholder Negotiation Scheme](#). NSW is working with the Australian Government on how to resolve funding uncertainty for the Program and progress the Program beyond May 2024.

The Bill already provides for the MDBA to develop a constraints relaxation implementation roadmap in consultation with Basin States by 31 December 2024. The development of the roadmap provided for in the Bill does not appear to address longer-term delivery which is arguably where this work could provide the most benefit. The matters suggested by the Productivity Commission provide greater direction for delivery over the longer-term. As per our Submission to the Senate Committee, the development of a roadmap must not result in a situation where projects are contradicted or 'put on hold' until the roadmap is completed as this will impede NSW progress and delivery of these important projects and undermine the significant investment already made by NSW.

NSW acknowledges that it is ultimately the Australian Government’s responsibility to recover any shortfall to bridge the gap between Baseline Diversion Limits (BDLs) and the SDLs. However, NSW is concerned by the Productivity Commission’s commentary that the Australian Government should commence water recovery to address the anticipated shortfall in the SDLAM program. Such action will undermine efforts to pursue alternatives to water buybacks, is inconsistent with the processes established in the Basin Plan for this program and does not respect the value that new or amended projects would provide to reduce shortfall. This risks unnecessary socioeconomic impacts on communities.

There is no ‘shortfall’ until the MDBA conducts its reconciliation and any water recovery undertaken before that process is complete would only be based on very rough estimates as the 36 supply projects are modelled as a package and individual project contributions cannot be determined with certainty. Any water recovery decisions to address SDLAM shortfall should be based on the outcome of the MDBA’s reconciliation.

We note the Productivity Commission’s conclusion that it makes little sense for the Australian Government to rapidly pursue the 450 GL of additional water for the environment when there is a risk of significant SDLAM shortfall. As part of a staged approach to water recovery, a commitment from the Australian Government to not pursue strategic water buybacks for the 450 GL until after SDLAM reconciliation and bridging the gap targets are met would allow viable, community-backed, non-purchase options to first be brought forward and pursued in earnest.

The strong preference of the NSW Government is ongoing investment in, and prioritisation of, the environment objectives of water recovery and that this be met through projects, rules changes and infrastructure, to limit impacts on communities and the water market. We expect the Australian Government to provide genuine costs to participants in the Off-Farm Water Efficiency Program to encourage water recovery and provide the greatest chance of program success.

NSW is preparing a plan for Basin Plan delivery that focusses on alternatives to buybacks for the 450 GL target that can deliver water savings and improved environmental outcomes and minimises the major socio-economic impacts on communities that large-scale buybacks have. We will continue to engage with our knowledgeable stakeholders on ideas and work with potential project proponents to bring forward viable applications.

The Australian Government has a responsibility to achieve value for money and limit impacts on regional communities in meeting Basin Plan water recovery targets. We agree with the Productivity Commission that purchasing large volumes of water over a short period risks market disruption and significant socio-economic impacts on communities. The communities or groups of communities most vulnerable to socio-economic impacts resulting from a water purchase program need to be identified – with the distribution and extent of the impacts analysed. These matters must be

considered by the Australian Government and influence purchase program design options and be supported by funding for community transition assistance.

Northern Basin Toolkit

The NSW Government remains committed to delivering our projects under the Northern Basin Toolkit and the additional time proposed under the Agreement reached between the Australian Government, NSW, Queensland, South Australia and the ACT to deliver the Basin Plan in full, will enable more projects to be delivered and greater environmental outcomes achieved. The discussions underway by Basin jurisdictions as to what additional accountability and assurance mechanisms could be put in place apply to both SDLAM projects and Northern Basin Toolkit projects.

NSW reports regularly on project progress through the Northern Basin Project Committee and updates are published on the [MDBA website](#). We point the Productivity Commission in particular to the status of three of the six NSW Toolkit projects that are being delivered under the [Gwydir Reconnecting Watercourse Country Program](#), which have moved beyond the business case with implementation underway.

Reporting on outcomes of the Toolkit is already in place with NSW's annual reports on active management in the northern Basin complemented by the Commonwealth Environmental Water Holder reports on other event-based mechanisms. Monitoring, evaluation and reporting plans have been developed for the two fish intervention projects of the Toolkit, however, require a funding commitment from the Australian Government to implement. The Australian, NSW and Queensland governments are also currently establishing an evaluation process that may address concerns raised by the Productivity Commission around the ecological outcomes achieved in the northern Basin through delivery of the environmental works projects and measures.

We are concerned by the proposal of the Productivity Commission that a stocktake of outcomes of these projects be along similar lines to the SDLAM reconciliation. Implementation of Toolkit measures was not the basis of the 70 GL adjustment recommended by the MDBA in 2017. Rather, these measures were supported due to their ability to improve environmental outcomes in the northern Basin, supported by Australian Government funding that would otherwise have been used in purchasing 70 GL of water from the consumptive pool.

The Northern Basin Review and subsequent SDL adjustments were focused on optimising environmental outcomes, while also maintaining employment and community outcomes, and a SDLAM-type reconciliation for these projects as referenced by the Productivity Commission is unlikely to be successful. The focus of any stocktake should therefore be on demonstrating that the

environmental outcomes achieved by the Toolkit measures align with the program's expectations and assumptions.

Environmental water planning and management

The Basin Plan prescribes a formal review and update mechanism for the Basin-wide Environmental Watering Strategy and Long-Term Watering Plans (LTWPs). NSW has commenced scoping a review of our LTWPs for the nine NSW Basin valleys in which NSW actively manages water for the environment. The review will focus on incorporating input from First Nations and new knowledge and information. Our reviews need to be supported by Australian Government funding and if the scope is expanded to consider natural resource management, this would require additional investment. As raised in our Initial Submission, the Basin Plan review in 2026 should also consider the role of coordinated landscape-scale planning (i.e. catchment management) and integrated natural resource management activities that link water with river health and biodiversity management.

NSW agrees that environmental water managers should seek to achieve cultural outcomes as a shared benefit. One of the six principles of the NSW Aboriginal Water Strategy is seeking opportunities to use water allocated for environmental and consumptive purposes to deliver Aboriginal cultural outcomes and benefits where synergies exist. As mentioned in our Initial Submission, our Healing Country Program is working with First Nations people across the Murray-Darling Basin to improve processes to integrate First Nations priorities in environmental water management, annual planning, and the review of LTWPs. NSW is actively delivering water for the environment to Country and has already achieved significant co-benefits for nations and the environment. NSW remains committed to further improvement in process and outcomes for First Nation involvement in environmental water management.

NSW is working closely with First Nations representatives and groups to improve representation of the voice and values of First Nations people in our water for the environment program. A focus of this work has been on establishing meaningful relationships with First Nations people and organisations across the Basin which includes improving First Nations representation on our Environmental Water Advisory Groups (EWAGs). First Nations engagement with EWAGs has had varying success over the years and, as a result, we are undertaking a review of First Nations involvement in water for the environment decision making and management. NSW is also supporting and facilitating First Nations engagement through establishment of our Regional Aboriginal Water Committees and project specific advisory groups such as the Reconnecting River Country First Nations Reference Group.

Water resource plans

Since our Initial Submission to the Productivity Commission, four more NSW water resource plans (WRPs) have been accredited, bringing the total to nine accredited plans, including our first surface water plan. Of the remaining eleven WRPs NSW is responsible for, eight are currently with the MDBA for formal assessment and three are pending resubmission (Barwon-Darling, Gwydir and Namoi).

We continue to work closely, collaboratively and as quickly as possible with the MDBA to progress resubmission of the remaining plans and expeditiously resolve any outstanding issues. NSW agrees with the Productivity Commission that the requirements of WRPs are too onerous. Commentary about the need to improve the efficiency of the WRP accreditation process reflects NSW's experience to date.

We note the commentary from the Productivity Commission and submissions that connectivity between WRP areas, particularly in the northern Basin, is an area for improvement. As set out in the Agreement reached between the Australian Government, NSW, Queensland, South Australia and the ACT to deliver the Basin Plan in full, Basin governments have committed to continue strengthening arrangements to improve connectivity in the northern Basin to support environment outcomes, including protecting Commonwealth environmental water to achieve environmental outcomes throughout the Basin.

We note the commentary that NSW has unchecked free reign to extract water in exceedance of SDLs where WRPs are not accredited. NSW meets its Basin Plan obligations through our existing bilateral agreement with the MDBA and statutory water sharing plans.

We take our water compliance obligations seriously, support water extraction being within SDL compliance limits and will take the necessary action when water take within a water source has been exceeded. As stated on our Initial Submission, in the absence of accredited WRPs, NSW completes an SDL compliance assessment each year under a bilateral agreement with the MDBA.

Whilst we acknowledge that until we have accredited WRPs, SDLs cannot be enforced by the IGWC, NSW is implementing several concurrent works to achieve and demonstrate compliance across the state, including:

- self-reporting on our SDL compliance to the MDBA,
- increasing the amount and quality of publicly available information about water,
- enhancing modelling capabilities,

- effective, transparent and accountable enforcement of water management laws by our Natural Resources Access Regulator (NRAR) using innovative compliance techniques and state of the art technologies,
- NRAR being a party to the Memorandum of Understanding with the IGWC and other Basin States on water compliance collaboration in the Basin,
- licensing and measurement of floodplain harvesting under the *NSW Water Management Act (2000)*, and
- rolling out a robust metering framework and moving forward with metering as fast as possible to achieve compliance with the *no meter no pump* objective.

We note the Productivity Commission’s commentary around floodplain harvesting concerns that remain. Floodplain harvesting is the last major form of water take in NSW to be licensed and measured. The core recommendations of the Select Committee Inquiry on Floodplain Harvesting were to restrict, manage and measure floodplain harvesting within legal limits in water sharing plans and under the Basin Plan. Our response to the inquiry reflects the NSW Government takes seriously our program to restrict and control floodplain harvesting within these water source legal limits.

Floodplain harvesting measurement rules came into effect 1 July 2022 with amendments to the *Water Management (General) Regulation 2018*. These rules are applied to all work approvals used for floodplain harvesting and require primary metering equipment to transmit water take data to the NSW Government in near real time. Licensing and measurement of floodplain harvesting has commenced in four of the five northern Basin valleys. Border Rivers and Gwydir valleys commenced on 15 August 2022, Macquarie valley on 1 March 2023 and Barwon Darling valley on 1 April 2023. The rules to be included in the Namoi Valley water sharing plans are currently being developed following public consultation.

Revised modelling indicates that improved estimates of extraction limits across the northern Basin are significantly lower than previously accepted estimates overall. Specifically, revised estimates of BDLs in the northern Basin, inclusive of floodplain harvesting, are more than 40 GL per year lower than the estimates made in 2012 and more than 140 GL per year lower than the accredited 'Cap model' estimates from almost two decades ago. These estimates are transparently shown in the MDBA’s peer review analysis of the NSW BDL revisions for these valleys. Our analysis indicates that licensing floodplain harvesting in the northern Basin will reduce diversions by more than 60 GL per year on average and more than 200 GL in very wet years.

Estimates will continue to improve as our models improve and licensees comply with their obligation to accurately measure take. The NSW Government is committed to ensuring the technical information used to support water management decisions is robust, fully transparent and open to

external peer review and public scrutiny. Eminent independent experts have been involved in the modelling for floodplain harvesting, and their views are incorporated into the models adopted for licencing. The independent peer review process is described on [our website](#).

It is estimated that implementation of the NSW Floodplain Harvesting Policy will lead to a more than 25% reduction in floodplain harvesting across the northern Basin and return in the order of 60 GL per year on average to floodplains, rivers and creeks. A [Connectivity Expert Panel](#) has been established to provide independent advice on the adequacy of floodplain harvesting access rules in enabling environmental and human needs to be met.

NSW has recently completed its first annual Matter 19 report on five accredited groundwater WRPs for the 2022/23 water year. Future Matter 19 reporting to the MDBA should not duplicate similar reporting through other channels, such as [SDL reporting](#) to the MDBA or as will be required under the newly published [IGWC SDL Compliance Framework](#). We recommend that the MDBA, IGWC and Australian Government streamline reporting requirements on Basin States. Reporting requirements can be improved by being less prescriptive, removing duplication and by being more outcomes focused.

The values of First Nations people

The NSW Government's Initial Submission, response to the information request and commentary provided above under 'environmental water planning and management' provide details of the work and initiatives NSW has underway to recognise First Nations/Aboriginal People's rights and values and increase access to and ownership of water for cultural and economic purposes. This includes existing commitments under the NSW Water Strategy and development of an Aboriginal Water Strategy that will recognise Aboriginal rights, values, and knowledge in water, strengthen involvement and influence in water management and protection, and the design of a delivery plan to meet the new inland waters target under the National Agreement on Closing the Gap.

We recognise consultation with Aboriginal communities can always be improved.

The NSW Government's Aboriginal Water Program is setting up [Regional Aboriginal Water Committees](#) (Committees) that will facilitate a meaningful partnership between Aboriginal people and the NSW Government to inform water management in NSW. The NSW Government will partner with the Committees on a range of water matters including development of the NSW [Aboriginal Water Strategy](#).

Through an open Expression of Interest process, we received over 100 applications for twelve Committees from Aboriginal people in coastal and inland NSW. A key part of each Committee member's role is to be a point of contact for the department's Water Group in their community on

water management issues locally and regionally and to assist Aboriginal stakeholders to gain an understanding of water management in NSW. The Committees are due to hold their first meetings in late 2023.

We seek clarification from the Productivity Commission on what further input and advice from First Nation's people it is seeking publication of. We also seek clarification on what additional information the Productivity Commission suggests Basin States report on with respect to how advice from First Nation's is considered, actioned and reflected that is not already provided as part of WRPs. Our WRPs are all informed by extensive local consultation with First Nations people on a Nation-by-Nation basis, rather than a broader approach by WRP area, aimed at improving efficacy and honouring connection to Country. Publication of the First Nations consultation reports already occurs as part of the WRP submission (where approval is granted and protection of intellectual property maintained) – see [Consultation Reports](#) as Schedules to our accredited WRPs.

We are progressing further engagement with First Nations across the Basin in line with commitments within accredited WRPs. This engagement is commencing in the Border Rivers/Namoi/Gwydir areas first, before extending to all areas of the Basin. This engagement is being delivered in consultation with the Aboriginal Water Program and will also work with the Committees as they become operational. A priority focus is the additional consultation to be undertaken with the Gomeroi Nation to address current information gaps in some NSW WRPs. It is anticipated this engagement approach will further evolve as we continue to work with and listen to First Nations.

Bringing new knowledge into the Basin Plan framework

The NSW Government is committed to tackling climate change with the best available science and we refer the Commission to our Initial Submission for further discussion on this subject. Climate change science should be further embedded in the Basin Plan with greater consistency in climate change modelling approaches across Basin States as a key area for improvement.

In the Productivity Commission's consideration of whether the *Water Act 2007* should be amended to more explicitly emphasise climate change science in the development and implementation of the Basin Plan, we suggest the Commission consider if compensation provisions would be triggered if SDLs were reduced or water allocation reliability changed. If so, we seek to understand the Australian Government's share of the changes.

NSW supports increased transparency and as outlined in our Initial Submission, we have worked hard to improve knowledge sharing and advice for NSW water users, environmental water managers

and water utility providers. We make water information and data widely available including model outputs, peer reviewed methods, and climate information.

Water quality and critical human water needs

Our Initial Submission and information request response discusses water quality and critical water needs, particularly in the northern Basin and the actions being taken by the NSW Government under our NSW Water Strategy and regional strategies. Further to our Initial Submission, the NSW Government has set up an Independent Connectivity Expert Panel to provide advice on appropriate triggers in NSW water sharing plans to improve connectivity and protect critical human and environmental needs in the northern Basin and downstream. The panel will release a draft report by early 2024, following which there will be a short period of public consultation. The findings of the panel will be included in a final report expected to be released in 2024 and will be used by the NSW Government to inform amendments to water sharing plans for the NSW northern Basin catchments by 30 June 2025. Other rule changes will also be investigated as part of the current review of the *Water Sharing Plan for the New South Wales Murray and Lower Darling Regulated Rivers Water Sources 2016*. NSW's lead on these issues reflects state responsibility for critical human water needs, an area where greater regulation by the Australian government via the Basin Plan is unlikely to be justified.

The Productivity Commission refers to the Office of the NSW Chief Scientist and Engineer's independent review into the 2023 fish deaths in the Darling-Baaka River at Menindee. The NSW Government has now released its initial response to the report. The NSW Government will provide and publish a comprehensive response and implementation plan which addresses each of the detailed recommendations in the report in the first half of 2024.

The Productivity Commission notes that water quality targets and objectives will be considered in the MDBA's Basin Plan review in 2026. This also needs to include targets and monitoring which are appropriate for surface and groundwater throughout the Basin and consider the 2018 recommendations of the Productivity Commission regarding salt export targets which have yet to be acted on. NSW has already flagged the need for critical human water needs to be revisited in the Basin Plan review in 2026 to improve clarity and relevance for water resources beyond the River Murray.

Trading rules

The NSW Government remains committed to transparent, trusted and accessible water markets throughout the Basin and NSW. We know that accurate, timely and accessible information is critical to an effective trade market and to give confidence in our water management systems.

NSW was an active participant in the Australian Competition and Consumer Commission’s inquiry into markets for tradeable water rights in the Basin and the body of work cumulating in our in-principle support of the recommendations set out in the Water Market Reform: Final Roadmap Report. The Bill implements several recommendations of the Water Market Reform: Final Roadmap Report, including introducing changes to the Basin Plan trading rules. It also provides for the development of regulations for matters relating to defining water market decisions and announcements. A comprehensive review of the Basin Plan trading rules by the ACCC should wait until after this work is completed. There is also a review underway of Schedule D of the Murray-Darling Basin Agreement (Schedule 1 of the *Water Act 2007*) which allows water users within South Australia, Victoria and NSW to trade water across state boundaries and between valleys.

Governance and engagement

NSW is committed to supporting transparency of decision-making. The Basin Officials Committee (BOC) publishes decisions and activities after each meeting. The BOC is currently chaired by a representative of the Australian Government, an arrangement that appropriately reflects the role of the Australian Government in facilitating water reform efforts in the Basin. Decisions made by BOC consider the perspectives of various stakeholders including advice from the Basin Community Committee alongside government roles and responsibilities for water management, however BOC should actively consider how it can improve its transparency and engagement with the Basin Community Committee.

The Productivity Commission raises the establishment of new bodies and roles, including:

- the MDBA establishing a Basin-wide body to represent First Nation’s people’s water interests in Basin Plan decision-making,
- the Australian Government establishing a role for overseeing and coordinating knowledge generation and knowledge sharing across the Basin, and
- a new corporate Australian Government entity to address the anticipated water recovery shortfall.

While NSW notes that Australian Government administrative arrangements are a matter for the Australian Government, care should be taken before creating new players in an already saturated and complex governance system, particularly where Australian Government agencies would be duplicating functions already managed through Basin States’ systems.

If additional investment is made by the Australian Government, consideration should be given to if funding may be better directed to helping communities adjust to a future with less available water, rather than creating new entities. The Australian Government does not have a role in the

implementation of supply, constraints relaxation and Northern Basin Toolkit measures beyond ensuring there is adequate funding available, that milestones are met to enable payments to be made under funding arrangements and reporting on water recovery and Basin Plan implementation progress (by the MDBA).

We seek clarification from the Productivity Commission on how it envisages a Basin-wide First Nations body would respect and complement Basin States frameworks and all Aboriginal Governance arrangements. Further, such a model should consider the ongoing role of the Murray Lower Darling River Indigenous Nations (MILDRN) and the merits of reinstating a northern Basin body.

In our Initial Submission, the NSW Government called for the MDBA to undertake a coordinating role working with state agencies to access the best available information, analytics, and communications.