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Productivity Commission
4 National Circuit
Barton ACT 2600, Australia
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Submission: Murray-Darling Basin Plan Implementation Review 2023

I am pleased to submit this feedback for the current Implementation Review.

I am a stone fruit grower based in Woorinen Irrigation district, north of Swan Hill on the Murray River in northern Victoria. I have used the prompts from your website to make this brief submission. Unfortunately I was unable to make the in person consultations in Echuca or Mildura.

What issues are important to you?

- **That the Basin Plan succeeds** in restoring the balance in water extraction across the Basin.
- **Maintaining overbank flooding** as the key mechanism/aspiration for delivering environmental water as opposed to engineering solutions.
- **Maintaining a healthy, complex and diverse river system, with good quality water.**
- **Improving trust in government** by following the law and using democratic institutions/instruments (such as the Productivity Commission) to build in transparency, integrity and ensure policy and reform are effective. Governments should implement recommendations from Royal Commissions and PC review etc or what is the point of them?
We must be making our decisions based on evidence and best available science, as is demanded by the Water Act.
- **The Federal Government using their full remit to hold the States to account** in their implementation of the Plan. This is a nation building project that must succeed.
- **Not wasting time.** Over the past ten years there has been a lot of wasted time because governments have delivered the Basin Plan in a piece meal approach, picking and choosing the attractive parts whilst dedicating no commitment/resources to other important parts. Given the price of water has risen considerably, that delay has been a very costly one and will mean that the Plan will require further investment from government to be completed.

- **That we have substantive and meaningful action on climate change (including no new coal and gas and putting an end to land clearing) and ensure Basin Plan 2 acknowledges the impacts of climate change** on the river system and how we use it into the future. Climate change is having a major impact on inflows to rivers across the Basin which influences allocation, water quality, ecosystem function and human health.

What lessons should be learned from programs aimed at helping communities adjust to the Plan?

- **Deeper collaboration and consultation** with wider group of community rather than just traditional stakeholders.
- **Provide opportunities for communities to sit down together** and work through issues (citizens assembly type arrangement.)
- Rural communities deserve more engagement and investment from government so that these **important reforms are not binary but opportunities for renewal and growth.**
- When we talk about water reform we talk about “irrigation communities”. These communities are diverse and complex and it is not helpful to see them through that lens.

How well is the Plan addressing the interests of Aboriginal people?

- Consultation and **collaboration needs to be genuine, meaningful and substantive.**
- **Targets for First Nations water rights should be legislated** so that governments are bound to fulfill this opportunity to deliver water justice to First Nations communities and enable them to thrive. It is not enough to keep quoting “The Murray Darling Basin is home to 40 First Nations Groups”.

How could Basin Plan water recovery be done better?

- **All forms of water recovery should be on the table** for communities and entitlement holders to consider participation in.
- **Fast track (and adequately fund if necessary) standardised and effective metering across the Basin.** It is imperative that we are able to measure water use fairly and consistently so that all water users are on a level playing field and so that public investment is measurable. Considerable water recovery may come from this process.
- **Ensure there is absolute integrity in accounting for water across the Basin.** Complexity and ambiguity appear to have enabled significant increases in licenced water diversions through the licencing of floodplain harvesting in NSW, at a time when the Basin Plan is in place to rein in over allocation. This is undermining confidence amongst water users and would appear to be having a significant impact on the health of the Baarka Darling and it’s ability to contribute historical flows to the Southern Basin.
- **Take the politics out of water recovery** by having a single water recovery target that is not attributed to the current narrative of some being SA water, some being for equivalent environmental outcomes, some having a socio-economic test, some for efficiency off farm but not on farm. It needs to be simplified and remove opportunities for false attribution, misinformation, and greenwashing.
- **All future water recovery needs to be for the Environment or for First Nations.** With savings getting harder to find and the water market tightening, there is no room for recovered water to be gifted to entitlement holders (i.e. Irrigators Share) or to involve water

users outside the Basin (ie Melbourne Water). All future investment must deliver directly to the Commonwealth to achieve to target as quickly as possible.

What needs to change to deliver infrastructure and efficiency projects under the Plan?

- Given the incredibly expensive nature of the Supply Measure infrastructure projects, **they should be halted (at the very least) until the Constraints relaxation projects are complete.** This would enable us to see what is achievable with the Environmental Water that has already been recovered and how that impacts the need and operation of such Supply Measure projects. It may well be that some infrastructure is not required and investment can be redirected to more important areas in the regions.
- **To fast track Constraints relaxation by the States**, a deadline should be set for landholder agreements after which time compulsory acquisition of easements is undertaken.
- With the current Federal Environment Laws having been recently reviewed and found to be largely ineffective it is incredibly important that infrastructure projects like the Supply measure projects have **better independent review/scrutiny as was recommended by the previous Basin Plan review by the Productivity Commission.** The concept of “offsets” has been problematic across environmental reforms and can be a very convenient opportunity for greenwashing. We need to be sure we are actually delivering real outcomes and not doing harm. We need to have integrity in the offset process.
- Until supply measure projects are operational and environmental outcomes proven, **the environment must have access to the equivalent volume of water.** This could be done through the purchase of temporary water entitlements.
- Alternatively, the Sustainable Diversion Limit Adjustment Mechanism (SDLAM) projects that are not complete by December 2023 could be shelved to **renew our approach to this reform and ensure it is fit for purpose and relevant in 2024.**
- Delivery of consumptive water has changed substantially since the Basin Plan was developed and many of the infrastructure projects were designed. This will have an impact of how environmental water can be delivered and what infrastructure is required.

How is environmental water improving the health of the Basin?

- It is useful to have secure water for our river system available for public good.
- **There is not a lot of good in e water that is tied up in dams** and constrained by rules and threats of private litigation and it is therefore imperative that States be forced to prioritise the Constraints relaxation projects so that recovered water can be used more effectively. This will have major benefits for the river system and entitlement holders by freeing up dam space and maximising annual usage of environmental water.
- The Mid Murray region around Swan Hill and Robinvale has been impacted by the **Torrumbarry Rule** which was instigated with the onset of the Basin Plan. It has meant that our region has not seen the full benefit of environmental water that our region has contributed via water recovery. The rule is not legislated and yet is followed to the letter by authorities and has left many of our floodplains and wetland ecosystems high and dry drying these past recent years.

What more could be done to support a healthy working Basin?

- **Commitment to further investment but delivered through a completely different framework of renewal rather than closing down.** Could be delivered through local governments areas so no community is left out and ensuring that the whole breadth of the

community participates. This collaborative work will envision the future, identify opportunities and build connections.

Thank you for the opportunity to participate in this important review.

Sincerely,

Peta Thornton

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