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Government of South Australia
Murraylands and Riverland
Landscape Board

**Murraylands and
Riverland Landscape
Board**

**Unit 5-6, Level 1 Sturt
Centre,
2 Sturt Reserve Road
Murray Bridge SA 5253**

**PO Box 2343
Murray Bridge SA 5253**

**Tel 08 8532 9100
MRenquiries@sa.gov.au
landscape.sa.gov.au/mr**

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Australian Government Productivity Commission

By email: basin.plan.2023@pc.gov.au

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Murray-Darling Basin Plan - Implementation Review by the Productivity Commission 2023

Dear Commissioner

Thank you for the opportunity to provide a submission on the public consultation for the proposed Murray-Darling Basin Plan - Implementation review by the Productivity Commission 2023. The Murraylands and Riverland Landscape Board (the landscape board) has the responsibility for managing the region's landscapes and takes an active role in being a conduit and connector to bring together the efforts of all levels of government, industry, key stakeholders, First Nations and communities.

The landscape board have reviewed the issues paper and FAQ documentation in collaboration with the board's community based Water Advisory Committee, which has membership from a range of stakeholders from across the SA Murray-Darling Basin, First Nations partners in particular Ngarrindjeri through the Ngarrindjeri Aboriginal Corporation and with technical staff. Ngarrindjeri Aboriginal Corporation give permission for the landscape board to share their views and feedback in this response. This response offers the collective views of all of the above groups, referenced herein as 'the collective'.

Collectively, one of the biggest challenges that continues to affect the implementation of the Murray-Darling Basin plan (MDB plan) is collaboration with other states; while it is acknowledged that there have been many gains in this space there are still many hurdles to overcome. The collective believe that working together in the national interest is key to achieving the outcomes needed for a healthy working basin.

The collective also believe it is important to recognise that it will take time to meet the desired targets for environmental water delivery, there needs to be commitment and progress that can be demonstrated. Being smart and allowing these actions to be done properly is essential to ensure adverse outcomes are avoided, particularly on those giving up water, each situation will have its own unique circumstances.

While there has been a commitment to incorporate and deliver First Nations outcomes in the implementation of the MDB plan, from listening to the landscape board's First Nations partners there is a level of frustration being expressed around having to engage with multiple bodies and struggling to connect the policy, planning and strategy in effective and collaborative way. It is important to get this right so that the Basin's water resources are managed in a way that supports the ongoing spiritual, cultural, environmental, social and economic needs of current and future generations of First Nations communities.

The recent high flows and flooding events although personally devastating for so many, has provided some extra time for action in the environmental sense and basin management should also make the best of this opportunity.

Further specific comments as they relate to the questions that were posed by the Productivity Commission can found in Attachment 1.

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The landscape board will continue its role with community and partners to ensure they have a voice in the design and delivery of policies, projects and services at the regional level, that their capacity is strengthened through improved knowledge, skills and resources and that the board builds and strengthens relationships for collective effort and impact.

For further information regarding this matter, please contact Melissa White, Manager, Water Resources within the Murraylands and Riverland Landscape Board

Thank you for this opportunity and I trust this information is of assistance.

Yours sincerely

Dianne Davidson AM

Chair, Murraylands and Riverland Landscape Board

Enc: Attachment 1 – Murray-Darling Basin Plan Implementation review 2023 Submission

Attachment 1 – Murray-Darling Basin Plan Implementation review 2023 Submission

What issues are important to you?

- Complete water recovery in its entirety for the environment and having First Nations interests represented in the environmental planning of that water.
- River operations and policies to support environmental water delivery in the Lower Murray-Darling system.
- States working together to achieve outcomes e.g. fixing upstream constraints in everyone's patch
- Water reform has lost its balance and long term vision for a healthy and viable Basin. Communities are worried about the future risk and pressure that permanent plantings will have on the system i.e. demand on water now outweighs the flexibility in the water market especially during droughts.
- Building community resilience during extreme events i.e. droughts and floods.
- Long term focus on social and economic outcomes for a healthy river system
- First Nations water allocations for cultural and economic outcomes and the need to identify gaps and current opportunities.
- How the Basin Plan is implemented is still important.

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

- Support programs that also offer business productivity efficiencies e.g. the South Australian River Murray Sustainability Programme (SARMS 3IP) on-farm efficiency program as this flexible funding model was well supported by the South Australian irrigation community. Business productivity efficiencies still need to be linked to a genuine water saving activity so as not to place upward pressure on water availability e.g. supply vs. demand.
- Actively learn from other pre-basin plan programs e.g. the 2009/10 small block exit programme in the Riverland was detrimental with \$500 million in stranded infrastructure. Programs need to support the community going forward rather than take something out e.g. assets. Even though this programme was incentive based it was a flawed adjustment model - future programs need thriving agricultural communities.
- Ngarrindjeri see opportunity in planning for communities to become more resilient to climate change adaptation. Federal and state agencies need to communicate with each other over climate change research, projects and challenges. Learn from successful local projects and frameworks e.g. Healthy Coorong Healthy Basin. Address and clearly communicate what we know and how we plan to get there.

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

- The landscape board have talked with First Nations who are frustrated with the lack of high level connection between policy, planning, strategy and collaboration e.g. MDBA, CEWH, SA DEW & NRM bodies. Everyone is working at different levels within their own silos and it is up to First Nations to try to find a solution in bringing all the information together.
- In South Australia there is an opportunity due to the current parallel processes occurring across DCCEEW, MDBA, SA DEW and landscape boards. Every party has genuine intent and outcomes could be achieved for First Nations if there was a collaborative approach on the complex issue of water. A solution put forward from Ngarrindjeri is to bring all agency partners together at a local level in an engagement framework for the region, this would bring greater efficiency and co-ordination leading to implementation of meaningful on ground outcomes.
- More upfront discussions on when and how resources will be made available to First Nations to directly buy water off the market – direct link to the failure of the \$40 million announcement.
- It is important that First Nations are involved in reviewing the Basin Plan because the plan was developed without First Nations involvement meaning that the target volumes set for water

recovery does not consider if those targets are sufficient enough from a First Nations and environmental perspective.

- Increased focus by federal agencies and elevated engagement with First Nations means that Nations can have a stronger voice in the review of the plan and be able to provide stronger argument in what targets need to be advocated for.
- For the broader community the landscape board has had feedback that the everyday irrigator has little understanding on what 'Aboriginal water interests' means and that there is a fear of the unknown on what cultural water recovery is and how this interacts with water markets.
- There needs to be better understanding by the whole community on what First Nations objectives and outcomes mean.

How could Basin Plan water recovery be done better?

- Achieve outcomes by delivering the offset projects
- There is a need to educate water owners and communities to better understand the value of their asset (water) so they have capacity to be more resilient. Currently there is opportunity in SA Riverland to support growers into a transition model in the wake of the current wine industry pressures.
- Having opportunities and mechanisms in place that allow willing water users (irrigators) and entitlement holders from anywhere in the basin the choice to sell water directly to environment or First Nations.
- Identify and address critical/priority constraints preventing effective delivery of environmental water

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

- Don't repeat history of having stranded assets due to implementation programs, there is a need to realise the potential from current infrastructure going forward; given the current state of the wine industry in the Riverland this scenario may prevail anyway. This highlights the importance of having an integrated industry support package/program e.g. opportunities to convert to lower water use crops and use water recovery funds to invest in transition and plan for future food security challenges.
- Having a flexible approach to future water recovery programs that support investments in integrated on-farm irrigation efficiency and productivity improvements e.g. some irrigators currently trade water to pay for rising costs of electricity, whereas a program could support a solar energy transition with water recovery rather than being a direct irrigation efficiency. Allowing investment in solar to be included as part of an integrated water saving/business productivity project is however, a sound investment.
- Creating opportunities to explore co-benefits of infrastructure upgrades e.g. DEW constraints team worked with Ngarrindjeri to explore co-benefits of the Hume Reserve and Teringie upgrades which lead to environmental resilience and refuge for Ngatji's being built into the project. Building this type of thinking into a landscape approach and having localised networks to bring relevant parties together will achieve multiple benefits.

How is environmental water improving the health of the Basin?

- Without environmental water there would be a closed Murray mouth and the Ramsar wetlands and Coorong would be degraded.
- Environmental water is creating resilience in the system between floods.
- Without water recovery targets and environmental water delivery mechanisms, First Nations would not be able to maintain cultural obligations to care for Country.
- Having First Nations involved in co-decision making on environmental water delivery is improving the health of ecosystems and First Nation communities.

- It is important that local river communities can see a visual or tangible difference and improved ecosystem health on the floodplains, lakes and wetlands. This also supports the mental health of river communities who have supported water recovery and has built their faith in the Basin Plan.
- Environmental water sustains mature trees, provides refuge for aquatic plants and animals and maintains soil moisture at selected sites. It has fulfilled its role of sustaining key sites during dry times but cannot create the overbank flows which are critical for the health of the Lower Murray floodplains.
- The use of environmental water supports tourism and commercial activities.

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

- **ALL** basin states need to commit to the Basin Plan, it is in the national interest that states work together to achieve the outcomes that are needed for a healthy working basin.
- Collaboration between states is essential to achieve the 450GL - there needs to be a common vision across all states and communities to get there – it's not SA's 450 GL, it's the Basin's 450 GL. The framing and messaging around this discourse could be improved to support this message.
- Having science communicated in a better way to show evidence of environmental water recovery.
- Describe environmental water as 'water for river health' to emphasise the value to all river communities as it flows through the river valleys to the river mouth. It is of value to everyone and is not competing against producers.
- Greater efficiency in engagement with First Nations, including co-design in water planning, joint decision making and weighting on First Nations interests in decision making e.g. Healthy Coorong Healthy Basin program have Ngarrindjeri involved throughout the program development phase. Ngarrindjeri's preference for proposed business decisions had a 20% weighting which valued, respected and acknowledged the joint decision making process. There needs to be strong engagement embedded in the process from the start and adequate resourcing to support decision making. Involving local partner organisations will also help facilitate a good on ground outcome.