

Dear Chris,

Really good to meet you and your colleagues the other day, and thank you for offering us an extension on our submission to the Murray Darling Basin Plan: Implementation Review 2023.

ACF's response is as follows.

- All barriers stopping the federal government purchasing water to meet environmental water recovery targets must be removed. Water should be purchased to meet recovery shortfalls.
- There remains a lack of First Nations entitlements to water. In 2020 researchers from Griffith University found First Nations water rights had been declining. The financial value of water entitlements held by First Nations amounted to [0.1% of the total value of the MDB water market](#). First Nations entitlements to water should be strengthened and expanded.
- Dodgy water saving projects don't deliver water for rivers. There are at least six water-savings projects unlikely to meet water recovery goals. The ecological benefits of these projects are highly contested. They should be abandoned.
- Reconnecting the rivers of the MDB to their floodplain must be a major priority of government action. Floodplain rivers are just what's on the label. They need to be reconnected to the floodplain. [Just 2% of the floodplain wetlands](#) are regularly being inundated.
- Failure to meet environmental water recovery targets, reconnect rivers to their floodplains and manage global heating impacts on the MDB ecosystems pose a risk to the regions businesses and access to financial capital. In near future these risks will need to be publicly reported by businesses and their financial backers. The Productivity Commission should consider the implications of the Australian Government becoming a signatory to the new [Global Biodiversity Framework in December 2022](#). This Framework includes a commitment from signatories to introduce regulation that requires businesses to disclose their risks, impacts, and dependencies on nature through their investments and value chains. The condition of the MDB river system and its floodplains in future years will be incorporated into financial performance reporting of agricultural businesses, banks and superannuation funds. There will be opportunities for industry leaders and threats for laggards from these advances in corporate accountability. The Productivity Commission should investigate how these broader shifts can improve the health of rivers and the regions communities and economies.

- According to the United Nations the world has left the era of global warming and moved into one of [“global boiling”](#). Global heating will smash the ecosystems and communities of the MDB hard. Dry conditions are becoming more severe and frequent. There will be less opportunity for wildlife, people and economies to recover in the interval between these dry conditions. The Productivity Commission should explore opportunities for nature-based solutions that increase the resilience of MDB ecosystems and ensure rules are in place to protect environmental flows, especially during dry and low flow periods. In addition the Productivity Commission should explore opportunities for economic and community resilience to be strengthened through the implementation of Renewable Energy Zones identified in the [AEMO Integrated System Plan](#). Other work recently completed by [Net Zero Australia](#) has identified opportunities for social, economic and environmental benefits from climate action within the MDB.
- Information used to manage the water in the basin needs to be freely available if management to improve and public trust restored and maintained. New environmental law reforms promised by the Australian Government present new opportunities to improve water, land and biodiversity management in the MDB. The Productivity Commission should explore how [EPBC Act reform](#) can improve the effectiveness, efficiency and transparency of information collection and management.

Many thanks for considering our response.

Regards,

Dr Paul Sinclair, Campaign Director

Caitlin Jack, Researcher