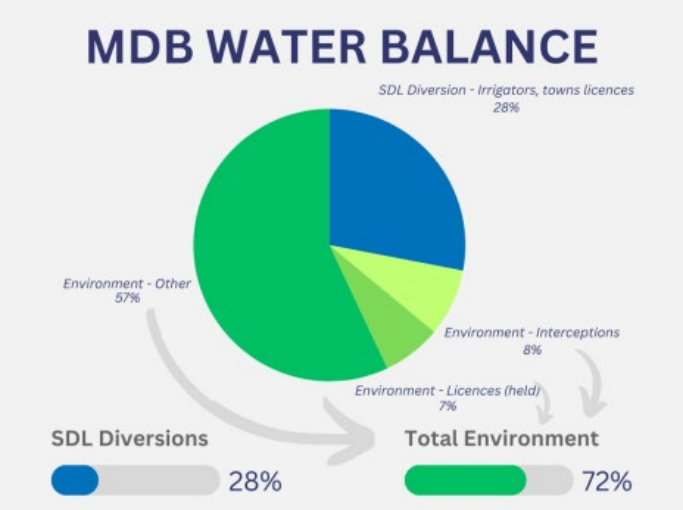
22nd April 2026

Summary of key messages for submission to MDBP discussion paper

Primary requests



1. No more water from agriculture (by any means)

The 2012 basin plan set Sustainable Diversion Limits (SDL) to bring the basin water use back to an Environmentally Sustainable level of Take (ESLT).

Consumptive use is consistently below SDL.

The Basin does not need more water for the environment

- 72 % of river flows are for environmental purposes.

2. No Rule Changes.

a. water recovery by rule changes represents a shift from voluntary participation to compulsory acquisition.

b. Any rule changes would require full compensation for lost access, changes to land use and reduction to the productive capacity of the land holding.

c. We would expect communities would be appropriately supported/compensated to adjust to the significant losses that would flow from any possible changes.

No change to Gwydir SDL

The discussion paper includes initial assessments of SDL. Both the Gwydir surface and the Lower Gwydir alluvial were identified for further investigation.

Gwydir regulated water source

Identified as at risk of environmental outcomes. The reports state: *"Environmental water delivery in the Gwydir is impacted by river operating constraints which limit the rate at which environmental water can be delivered to the Lower Gwydir Wetlands, including the identified Ramsar-listed wetlands, especially during peak consumptive water delivery periods (generally spring–summer)."*

The primary reason for this is that the Gwydir Constraints management as detailed in the Northern Tool kit has not been completed by the NSW Government.

Water entitlement holders and their communities cannot be punished because of Government failure.

Constraints management must be done in full consultation with impacted landholders and must embrace simple cost effect options such as small levees to assist in delivery.

Requests

3. MDBA strongly reinforce the requirement that governments continue to address community supported constraint management in the Gwydir.
4. Implementation of infrastructure (including levees or below ground channels) to enable water to be delivered to Ramsar sites are seen as viable solutions to Gwydir constraints management.
5. No changes to Gwydir surface SDL are considered until the NSW government has completed their requirements for community supported constraint management under the Northern Toolkit, and changes have had time to show results.
6. Users and impacted community members are actively engaged in consultation on the Water source between the MDBA and NSW DCCEEW.

Lower Gwydir Alluvium

Identified as being of concern that SDL may not support outcomes.

Key considerations

- Usage is main driver for decline; there have been improvement in past 12 years but still need time for trade restrictions to demonstrate benefits.
- Aquifer is very large
    - High buffering because takes long time for changes in recharge to affect overall levels.
    - There is low sensitivity to use or changes in recharge.
- Proportion of take to recharge is less than 0.9
- NSW DCCEEW do not have major concerns.
- NSW DCCEEW believe management should be outside the SDL and the WSP.

Requests

7. No change to SDL until management arrangements (trade restrictions) have had time to demonstrate that they are working.
8. Support maintaining the existing trade restrictions until 2035 (15 years) to enable their impact to be fully appreciated.
    d. Request 15 year time frame as the aquifer has low sensitivity to use or changes in recharge.
9. Users are actively engaged in consultation on the Water source between the MDBA and NSW DCCEEW before any changes to management are made.

Options Identified

Within the discussion paper the MDBA presents issues and options under consideration. Following is a summary of the GVIA position on these options.

Improving river connectivity in Northern Basin

Chapter 5 "Improving river connectivity in the northern basin" is of significant concern, there is no support for this artificial proposal. There are no clearly defined outcomes and no problem statement associated with creating an artificial connection in the northern basin.

Northern Basin is very different to the southern basin, connectivity as seen in the south cannot be achieved in the highly variable ephemeral northern basin. Flows are highly connected to episodic rainfall events, which means that when dry times are experienced, northern river systems will and have always ceased to flow.

Climatic conditions have been omitted as being one of the pressures, possibly the most important pressure contributing to cease to flow events in the northern basin.

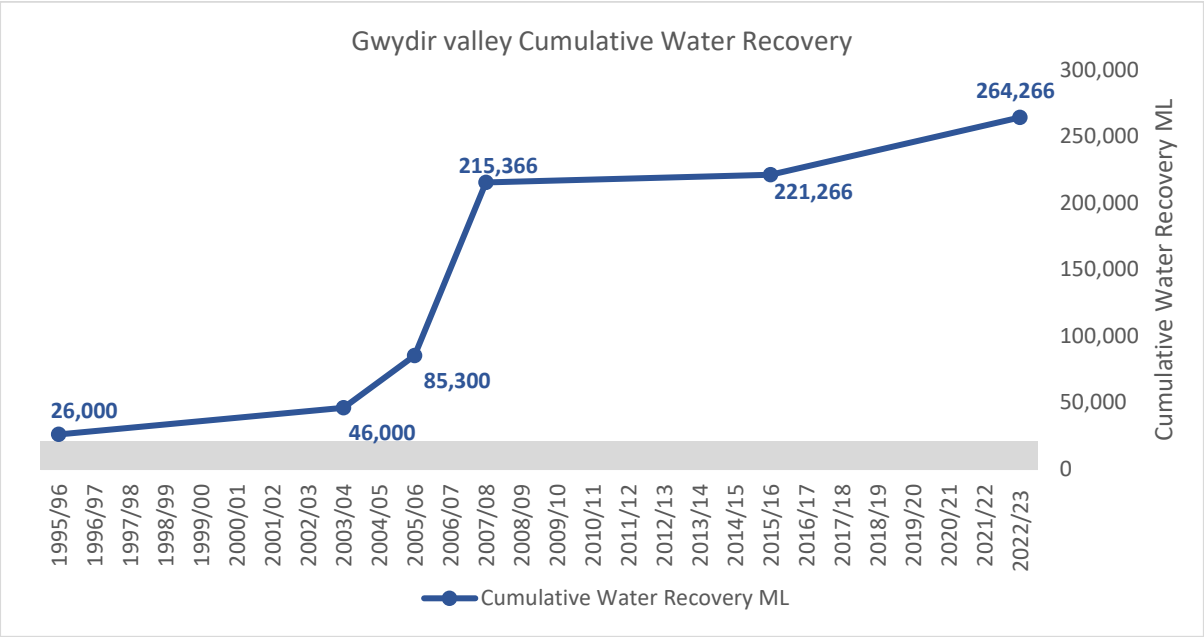
The Gwydir historically hasn't naturally flowed into the Barwon Darling as significant wetlands and channel capacity limit connectivity outside of flooding and high rainfall events.

Prior to regulation of the tributaries there was more variability in flows in the Barwon Darling to Menindee. Storage dams such as Copeton have meant that droughts are shorter, start later and typically are less deep than naturally, because the dams have meant that the rivers flow more consistently and longer than they would naturally[1].

The environment holds a third of all entitlement in the Gwydir (224,000ML). Environmental releases currently and in 2018 – 2019 were stored in Copeton Dam for years before being utilised. If the

[1] Reference for WaterNSW

environmental water managers wish to create flow in an ephemeral river system, they already have the resources to do this.



The ephemeral and intermittent nature of river systems in the northern Basin means ecosystem are reliant on both wet and dry periods, and efforts to try and make the river flow constantly would be detrimental to these ecosystems;

Request

7. If the MDBA decide that they need additional water to create connectivity in the Barwon Darling, they must purchase their requirement on the open market. We will not accept rule changes as they represent compulsory acquisition.

Maximise the benefits of water for the environment:

- Community supported constraints must be implemented.
- Infrastructure at sites such as Menindee lakes must be updated so water is not wasted to keep fish alive in a poorly designed system. Infrastructure at Menindee has been a problem for more than 20 years, it must not be urgently updated to be fit for purpose.
    - Fish passage needs to be implemented on main weir
    - A gated structure needs to be installed on weir 32

Request

8. The MDBA prioritise investment in infrastructure at Menindee Lakes including upgrading Pamamaroo inlet regulator, installing a gated structure on weir 32 and implementing fish passage on main weir.

Responding to native fish decline

These fish deaths are not new and occur all over the basin in both droughts and in floods.

At Menindee Lakes where fish get stuck unable to move when water quality declines, because infrastructure is not fit for purpose. Proposals have been put forward for many years, but no one is willing to address the problem with a practical longer term solution. The infrastructure on Main Weir and Weir 32 must be urgently updated. The need to fix the infrastructure is a position held by fish ecologists such as Ivor Stuart[2]

- Infrastructure must be updated urgently to enable fish passage at critical locations such as Menindee Lakes.
- Carp management must be implemented urgently as they are continuously degrading river health impacting native fish and water quality.

Request

10. The MDBA prioritise investment in
    a. Carp management
    b. Fish friendly infrastructure at Menindee Lakes

Improve floodplain and wetland health

- Community supported constraints must be implemented.

Water infrastructure and critical human water needs

- Infrastructure must be updated urgently to enable fish passage at critical locations such as Menindee Lakes.
- Critical human needs can be secured though a comprehensive look at solutions, including infrastructure (storage dams, weirs, pipelines, tanks), secondary supply sources, water recycling or desalination. Local Government must be supported to implement alternatives.

Request

10. The MDBA actively support diversification of alternative water supplies to enable water security in highly variable ephemera river systems. This must include support for state and local government programs necessary to fund strategic investment in water security for regional communities.

[2] https://soundcloud.com/csu-gulbali-institute/gulbali-report_ivor-stuart?utm_source=clipboard&utm_medium=text&utm_campaign=social_sharing

Improve Basin Plan regulatory design

- States must be held accountable for their role in the delivery of a healthy working basin.
- Management challenges such as those at Menindee must be addressed.

Improve science and knowledge to inform Basin water management

- Acknowledge that Climate change is already factored into existing water sharing arrangements. Primarily through water sharing policies, water allocations, and in the setting of extraction limits.
- Improve socio-economic assessments of costs and benefits of proposals. Socio economic assessments as completed in the Northern Basin Review should be seen as a minimum standard for assessing impacts of water recovery on community
- Full cost benefit analysis should be completed for any water recovery proposals and must be comprehensive including but not limited to
    - Determining the initial or base entitlement value
    - Assessing reduction in water allocations and reliability
    - estimating the reduction in entitlement value
    - Assessing any other impacts

Request

11. Climate change policy must support adaptation rather than impose prescriptive reductions in water reliability and allocations.
12. Improved socio-economic assessments of costs and benefits of proposals be mandated to include assessments of Socio-Economic Indexes for Areas (SEIFA) and community viability.
13. A comprehensive cost benefit analysis be completed for any water recovery proposals.

Assumptions

Basin Plan discussion paper uses three lines of enquiry.

1) Line of Enquiry 1: current implementation of the Basin Plan (and level of use) as at June 2024
2) Line of Enquiry 2: full Basin Plan implementation (assuming full use of the SDL, SDLAM reconciliation has occurred with a 300GL/y shortfall, constraints have not been relaxed, recovery of 450 GL/y for enhanced environmental outcomes with 129GL/y of that in the northern Basin).
3) Line of Enquiry 3: full implementation under a range of plausible future hydroclimates

Line of enquiry 2 assumes current basin plan is fully implemented as perceived by government. The failure to have constraints relaxed, and assumptions of full 450GL and SDLAM are not realistic

assumptions. The primary assumptions should be line of enquiry 1. We do note that it is expected that 400GL of the 450GL will be acquired by December 2026[3].

Fed DCCEEW have allocated all over recovered water to the 450GL, including that not covered by approved Water Resource Plans (eg Gwydir 5GL). We do not support this. Any valley impacted by arbitrary proposals such as connectivity should be able to allocate over recovery water specifically to these proposals to provide the best most transparent and balanced outcomes for local communities.

Public consultation

The MDBA 12-week public consultation opened on 5 February and will close on **1 May 2026.** It is important that as many GVIA and Gwydir Valley community members put in submissions to ensure our region is represented at the table:

- The issues and options presented in the **Discussion Paper**
- Any other issues and options we should consider

Watch the MDBA **webinar** for more information on the paper and submissions process or read the **submissions guidelines**.

After consultation closes, the MDBA will publish a 'what we heard' report summarising the feedback received.

[3] https://www.dcceew.gov.au/sites/default/files/documents/450-gl-implementation-plan-march-2026.pdf