

6th March 2026

2026 MDBP discussion paper

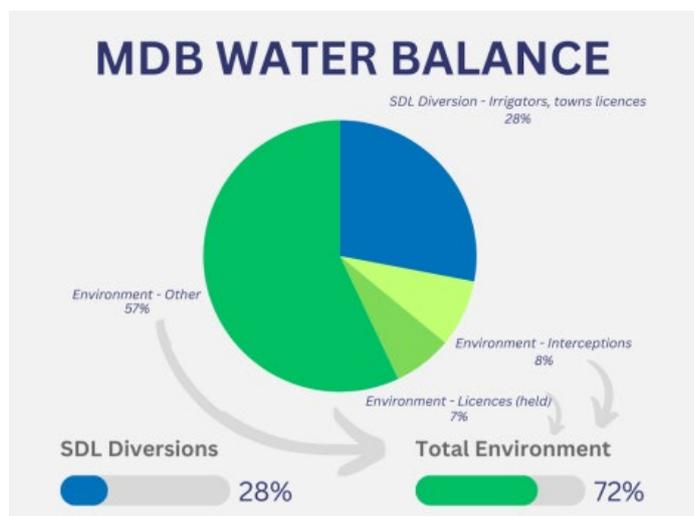
Background

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 now consistently below SDL.

The Basin does not need more water for the environment

- 72 % of river flows are for environmental purposes.



Discussion Paper Assumptions

Basin Plan discussion paper assumes current basin plan is fully implemented as perceived by government. This scenario assumes:

- 450 GL of additional water recovered including 100 GL from the northern Basin and 350 GL from the southern Basin
- constraints are not relaxed.
- sustainable diversion limit adjustment mechanism (SDLAM) measures, are complete and operational. Water is recovered to address any SDLAM shortfall, estimated at 300GL. Current water purchasing and efficiency programs are completed.

These are not realistic assumptions.

Issues with the Assumptions for the Gwydir

1. Constraints were a significant component associated with 450GL, SDLAM and the Northern Tool Kit.

Assuming that they are not relaxed is accepting of government failure.

This assumption shifts the burden back to communities already suffering from water recovery. This is why the Gwydir Regulated SDL has been singled out as being at risk.

2. 450GL southern connected system enhanced environmental outcomes:

The federal department believe they are exhausting their options in the southern basin. The southern areas of Basin (including Vic and SA) don't feel they can be held to recover all the 450GL.

[Basin Plan 2012 - Federal Register of Legislation](#)



Initial intention was for 450GL to be achieved through constraints management in southern connected system to enable utilisation of recovered water. Since 2023 amendment bill the 450GL can now be purchased from anywhere in basin. Fed DCCEE have allocated all over recovered water to the figure, including that not covered by approved Water Resource Plans (WRP) (eg Gwydir 5GL). They however, cannot account this 5GL from the Gwydir until there is a WRP.

Issues with recovery of an additional 100GL recovery from the Northern Basin

Northern Basin Review reduced the volume of water to be recovered in the northern Basin by 70GL. This reduced the water recovery target to 320GL. In 2022 the MDBA held the position that 320GL water recovery in the Northern Basin is sufficient to satisfy the Environmentally Sustainable Level of Take (ESLT) requirements of the Water Act.

The decision to support the 320GL target was strongly influenced by the socio-economic findings. It showed:

- The socio-economic impact of environmental water recovery in the Gwydir was significant. Water reforms trigger ripple effects across communities. Less water for farming means fewer jobs, lower local spending, smaller schools, reduced services, and declining community participation, the 'multiplier effect'.
- The Northern Review¹ identified that not only were there substantial reductions in population and employment but that there were notable declines in the Socio-Economic Indexes for Areas (SEIFA). Moree alone saw the following declines.

MDBA Policy Position

- The Basin Plan implementation must do better at addressing the associated socio-economic impacts for Basin communities and recognising the value of water security for Australia's food and fibre production.

| SEIFA | 2006 | 2011 |
|----------------------------|------|--------|
| education and occupation | 5 | ↓ to 3 |
| advantage and disadvantage | 5 | ↓ to 3 |
| Economic resources | 4 | ↓ to 2 |

Question

If communities could not carry the burden of additional water recovery in 2016 because of declining socio-economic indexes how can communities carry that burden now, when there has been further decline in many regional communities.

¹ Northern Basin Review - Technical overview of the socioeconomic analysis



Message on recovery of additional 100GL

The viability and social structure of northern communities would be significantly impacted by further significant water recovery under the guise of 450GL. The northern communities cannot support recovery of 100GL towards the 450GL objective.

- **We support the MDBA position that 320GL water recovery in the Northern Basin is sufficient to satisfy the Environmentally Sustainable Level of Take (ESLT) requirements of the Water Act². We do Not believe water for the 450GL should be recovered from the northern Basin.**
- **If the Government wishes to ignore the accepted ESLT requirements of the Water Act and pursue recovery of water towards the 450GL from the northern Basin, they must purchase it on the open market.**
- **Any water purchased from the northern Basin must deliver demonstrated environmental benefits that would accrue from this water purchase.**
- **Socio-economics must be prioritised to inform decision making on purchase of any additional water in the northern basin.**

Issues in the MDBA discussion paper for the Gwydir

Creating connectivity in Northern Basin

This is extremely concerning as there are proposals in play that will reduce access to FPH, Supplementary and GS entitlement across the region. The proposal included a 28% reduction in GS in the Border Rivers.

This is unacceptable as we have not seen any demonstrated environmental benefits of proposals developed by the NSW connectivity panel. There is also a lack of understanding or appropriate assessment of the socio-economic impacts of proposals to date.

The Northern Irrigation groups have engaged modellers and economists to rationally analyse the assumption in the government proposals and the assessment of the impacts.

We know from past water recovery in 2008, that resulted in 20,000 ha less irrigated cotton in the Gwydir, that is reduced farm gate income by \$150 million and had roll on impacts of \$450 million for community.

Request

1. **Connectivity is NOT pursued by the MDBA without an independent assessment of the concept and clear articulation of the objectives of the concept. The community cannot accept the NSW panel proposals.**

Policy Position

Property rights are fundamental

Rule changes are not and acceptable form of water recovery.

² [MDBA response to Productivity Commission Information Request 2023](#)

Assessment by the MDBA must;

- **Analyse the capacity of existing Held Environmental Water to deliver connectivity as has been demonstrated from December 2025 to March 2026 (this must be fully accounted for in model assumptions).**
- **Accurately assess impacts of flows from Qld and NSW water sources**
- **Question if the concept is hydrologically or ecologically rational**
- **Demonstrate the specific environmental benefit from any proposal**
- **Complete comprehensive socio-economic assessments of the impacts of any proposal on communities in the northern basin.**

Chapter 3: An initial assessment of SDL's

1. Gwydir regulated Water source³

Identified as at risk of environmental outcomes.

Water Source Statistics

- Ramsar sites - Gwydir Wetlands: Gingham and Lower Gwydir (Big Leather) Watercourses
- Contribution to Basin water - 3.4% of the total water available in the Murray-Darling Basin
- Key waterways - Gwydir River (480km); Copes, Moredun, Georges and Laura creeks, Horton River, Mehi River, Carole–Gil Gil creeks, Gingham Watercourse (northern arm) and lower Gwydir or Big Leather Watercourse (southern arm)
- Water storage - Copeton Dam (1,364 GL)

Key considerations

- Over-recovery: The DCCEEW [surface water recovery factsheet](#) has allocated the 5GL over recovery to the CEWH despite there still not being an accredited WRP. Our understanding is that the 100GL proposed to be recovered from the north is on top of the inclusion of the over recovered portions from the Gwydir and the Macquarie.

Objective

Maintain sustainability of resource for all users.

Current Management of Water Source

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.

Request

1. **MDBA strongly reinforce the requirement that governments continue to relax constraints in the Murrumbidgee and Gwydir.**

³ [Sustainable Diversion Limit surface water assessment for Gwydir Water Resource Planning Area - Data products - MDBA Library](#)

2. ***No changes to Gwydir surface SDL are considered until the NSW government has completed their requirements under the Northern Toolkit.***
 - 2.1. ***Community supported constraints management is completed.***
 - 2.2. ***Implementation of infrastructure (including levy to channel water through private land to the Ramsar site) is seen as a viable solution to Gwydir constraints management.***
3. ***Users are actively engaged in consultation on the Water source between the MDBA and NSW DCCEEW before any changes are made.***

2. Lower Gwydir Alluvium⁴

Identified as being of concern that SDL may not support outcomes

Storage statistics

- Size 23,312GL
- Entitlement volume and SDL 33 GL/yr
- Recharge estimate 32-47 GL/yr
- Average annual take 30.54 GL/yr (93%)

Key considerations

- There has been Improvement in past 12 years but still some concern recharge
- Aquifer is very large
 - High buffering because takes long time for changes in recharge to affect overall levels. ie low sensitivity to use or changes in recharge.
- Proportion of take to recharge is less than 0.9

Objective

Maintain sustainability of resource for all users.

Current Management of Water Source

Trade restrictions were implemented in zone 2 in 2020, and across whole water source by 2023.

Improvements have been observed.

Request

1. ***No change to SDL until management arrangements (trade restrictions) have had time to demonstrate that they are suitable.***
2. ***Support maintaining the existing trade restrictions until 2035 (15 years) to enable their impact to be fully appreciated.***
 - 2.1. ***Request 15 year time frame as the aquifer has low sensitivity to use or changes in recharge.***
 - 2.2. ***If at time of WSP review (2029) improvement is not being observed. GVIA request detailed consultation with department groundwater team to discuss options.***

⁴ [Sustainable Diversion Limit groundwater assessments for Gwydir Alluvium Water Resource Planning Area - Lower Gwydir Alluvium \(GS24\) assessment - MDBA Library](#)



3. **Support maintaining the 200% carryover.**
4. **Users are actively engaged in consultation on the Water source between the MDBA and NSW DCCEEW before any changes to management are made.**

Messaging for Basin Plan 2

Key Messages

1. Overarching objective of SDL and ESLT achieved
2. Future actions must prioritise optimisation not recovery
3. No more water recovery until existing water is utilised as intended. It is essential that there is significant progress with;
 - a. Community supported constraints
 - b. Complementary measures

Primary requests

1. ***No more water from agriculture (by any means)***
2. ***Future Basin Plan focus on improving managing what water has been acquired.***
3. ***Critical human needs are secured through a comprehensive look at solutions, including infrastructure (storage dams, weirs, pipelines, tanks), secondary supply sources, water recycling or desalination.***
4. ***Acknowledge that Climate change is factored into existing water sharing arrangements. Primarily through water sharing policies, water allocations, and in the setting of extraction limits.***

MDBA Policy Position

- The Basin Plan must transition to an outcome based focus. Governments must optimise environmental outcomes through being smarter and more strategic with environmental water; investing in complementary measures (such as invasive species control, fish passageways, habitat restoration, fish screening, riparian land management); and a paradigm shift of working together.

If you have any questions associated with the information in this brief, please contact

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