



Critical Issues for SA that must be included in MD Basin Plan Review 2026

- 1. Environmental Water for the committed 3,200GL must be recovered** in MD Basin Plan 1. This should include voluntary buybacks where Efficiency Measures as part of the 450 GL program or SDLAM measures as part of the 650 GL program have failed to deliver or are incomplete and overdue and should be cancelled. Finances for the voluntary buybacks should come from the remaining funds in these schemes along with (for example) funds from the Commonwealth's Green Bond Program which has already been used to fund Basin Plan implementation. Consideration should be given to a staged approach to recovering this shortfall of water (estimated to be around 300GL), which may make it more palatable to the Commonwealth.
- 2. Climate Change must be considered as it is already affecting flows** in the Basin. Sustainable Diversion Limits (SDL) for all catchments must be reviewed in accordance with the Water Act, 2007 to ensure an Environmentally Sustainable Level of Take (ESLT) is achieved throughout the basin. In the Basin Plan Review in 2010 it was estimated that between 3,900 and 7,500 GL of water needed to be returned to the environment. With the development of better models, more scientific knowledge and increasing climate change impacts, the ESLT needs to be re-evaluated and SDL's adjusted accordingly. Also, other measures to address climate change need to be considered, including the addition of more high reliability entitlements to the CEWH's portfolio to ensure that there is enough water for the CLLMM during drought. Currently the portfolio relies heavily on lower reliability entitlements which will not receive allocations when it is dry. Addressing system bias against environmental water will also allow its use to be optimised, which is critical in a changing climate.
- 3. The natural rhythm of rivers must be restored.** Rivers need to connect both laterally with their flood plains and longitudinally along their main channels into the next downstream catchment. The potential benefits of Environmental Water are being compromised in the Southern Basin by Constraints on flows to reach their floodplains and by lack of Connectivity of rivers in the Northern Basin. These include both physical constraints as well as operational restrictions which prevent watering sites that are higher on floodplains and protecting low level flows. Physical, regulatory and legal actions are needed to achieve Constraint Relaxation. The primary issue that needs to be addressed is the fact that the properties of several thousand landholders in NSW and Vic need to be flooded to get the flow rates required to water SA's floodplains. Energy must be directed to addressing this barrier/creating the enabling conditions required to break this deadlock or there will be no meaningful outcome for SA and its beautiful floodplain biodiversity. This is absolutely fundamental – and it can be solved with the right approach. It will require additional Commonwealth funding, but it's tied to an existing commitment under the Basin Plan and should be treated as non-negotiable, particularly as it's the difference between large areas of floodplain surviving or dying.
- 4. Meaningful Water Quality Objectives and Targets must be established** for a broad range of causes and parameters to meet environmental, social, cultural and Critical Human Water Needs (CHWN). Basin States need to work together to improve capacity for preventive actions and early intervention to address water quality issues at their source. This will require, amongst other things, sufficient environmental flows at the right intervals etc. to dilute nutrients etc., as well as water quality reserves in certain storages (e.g. Menindee Lakes) to ensure that environmental water isn't underwriting broader system mismanagement which ends in fish kills/water quality crisis.
- 5. First Nation's rights and interests must be addressed** in light of the historical and on-going dispossession to remove structural, institutional and legal barriers that impede water justice and self-determination.
- 6. Governance to support Basin Plan outcomes must be transparent, reliable and inclusive.** Management of such a complex and diverse system such as the MD Basin must rely on hydrological modelling which must be deemed fit-for-purpose by an independent expert panel, formally accredited in line with specified criteria, independently audited and be open to public scrutiny to be accepted and trusted by the whole Basin community.