River Lakes and Coorong Action Group Inc
Email: riverlakescoorong@gmail.com
m 0417 824 973 ABN 23 590 559 324
Winner 2009 Jill Hudson Environmental Award

RLCAG Inc Submission 28th October 2026

SDLAM draft determination 2026

The River, Lakes and Coorong Action Group strongly supports the intent of the Water Act 2007, and the Basin Plan of 2012, to restore the rivers and the wetlands of the Murray Darling Basin to good environmental health for generations to come.
The calculated sustainable diversion limit shortfall must be returned to the system as real water.

The 265 GL " bridging the gap" plus any volume that remains outstanding from the 450 GL must be purchased from willing sellers. This is the only way to deliver the Basin Plan in full. It has been proven that buybacks are the most efficient and cheapest way to put real water back in to the system and there is no doubt that real water is what is needed now.
Funds allocated for the failed SDLAM projects must now be used to procure real water.
Life requires water.

The statement (pg 22)" While some environmental outcomes at individual reaches were lower than benchmark outcomes, these reductions were offset by improvements elsewhere in the Basin, resulting in higher overall regional environmental outcomes scores and achieving environmental equivalence." This is purely an accounting tool and is a meaningless statement. The lower reaches are in decline.

An area of severe degradation cannot be offset by an area of better environmental health, giving an acceptable average outcome. This averaging out of conditions gives a false idea of the environmental state of the Basin.

The SDLAM has been a very complicated and expensive exercise designed to take every last drop of water out of the system before causing collapse. This whole mindset is wrong, but we must play by the rules that have been set. The SDLAM program has delayed full recovery of "bridging the gap" flows which was meant to be achieved by 1 June 2019, extended to 2024, then again to 2026. Seven and a half years of delay and only approximately half of the 605 GL/y recovered.

No further delays should be tolerated. Sustaining the rivers and wetlands for future generations and restoring First Nations water rights should be the priority.
It is important to remember that the SDLAM Reconciliation process is a prescribed methodology in the Basin Plan ie Schedule 6 and Chapter 7, but does not necessarily represent reality. There is no ground truthing of outcomes.
It is a flawed concept that engineering solutions with calculated assumptions of "environmental equivalence" of water savings can produce the same outcomes as the provision of real water.

Real world evidence must be taken in to account. Basin ecosystems continue to decline as evidenced in the listing of the Murray River ,from the Darling to the Sea, and its wetlands as critically endangered under the EPBC act. This is an alarming state , giving a 50/50 chance of this water-dependent ecosystem surviving 10 years. The Lower Darling remains in a similar parlous state along with the continued degradation of the Southern Lagoon of the Coorong. It is glaringly obvious that the environment of the Basin is in trouble.

Evidence suggests the current Environmentally Sustainable Level of Take is not sustaining the environment, far from it.

Without access to the hydrological modelling, it is not possible to determine the accuracy, nor the assumptions and weightings used in the Adjustment Assessment Modelling. Early advice from the MDBA was that there was an expected shortfall of between 255 - 355 GL/y (MDBA's December 2025 SDLAM Assurance Report). The value determined by the Draft Determination of 265 GL/y is at the very bottom of this expectation. How can this be justified as the expectation would be that the value would be somewhere in the middle of MDBA's expected range - ie a shortfall of around 305 GL/y?

The Basin Plan calls for an Independent review of the Adjustment Assessment Modelling. MDBA selected Barma Water Resources (BWR) to carry out this review. However BWR is a small company whose main client is MDBA (5 of 8 contracts won with MDBA) and a total portfolio of $ 383,418.
(https://govmarket.com.au/supplier/barma-water-resources-consulting-pty-ltd). This is a small company, highly dependent on continuing MDBA work. Its suitability for such an important " independent" review raises questions. This selection doesn't pass the "pub test" for independence, nor satisfy the criteria for "best available science".

The Basin Plan offered hope for equitable, sustainable water use. It must be delivered, in full. It is time for obfuscation to cease and the shortfall that is identified be returned via buybacks from willing sellers.

Yours sincerely
Janette Brooks
Secretary: River,Lakes and Coorong Action Group
E riverlakescoorong@gmail.com
M 0417824973