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Submission to the MDBA's discussion paper for the 2026 Basin Plan review
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The Basin Plan is Australia's largest river restoration initiative, developed to address the over-allocation of water resources for consumptive uses across the Murray–Darling Basin. While an important step forward, the Plan was never sufficient to resolve the full scale of the Basin's underlying ecological and governance challenges.

Fourteen years and $11.4 billion of public expenditure later, scientific evidence demonstrates that environmental water recovered under the Basin Plan has delivered localised benefits while some other aspects of rivers, wetlands and floodplain health have not improved as intended.[1,2] Climate change is compounding risks to communities, ecosystems and water security.[3]

The Wentworth Group welcomes the opportunity to contribute to the 2026 review of the Basin Plan. This first statutory review presents a critical opportunity to correct the course of the Basin Plan and restore confidence in governments' ability to secure the Basin's future. This review is both essential and urgent.

A core element of this submission is the *Blueprint for the next Murray–Darling Basin Plan* document, which sets out five integrated, practical and evidence-based reforms for healthy river Country (see Box 1 and attached). Delivered as a package, these reforms would improve ecosystem health, strengthen climate adaptation, protect drinking water supplies, provide greater certainty for Basin communities, and support Aboriginal Peoples to care for Country.

Box 1. Five reforms recommended in the Wentworth Group's *Blueprint for the next Murray-Darling Basin Plan*.

1. Set Basin Plan targets to protect and restore at least 60 percent of the Basin's wetlands
2. Embed climate change into water planning
3. Uphold Aboriginal peoples' values of water and their rights
4. Support communities to thrive through the transition
5. Improve governance and accountability

Several of the proposals in the MDBA discussion paper are aligned with the recommendations in our Blueprint. Specifically, we welcome the focus on river connectivity, critical human water needs, improving floodplain health and reviewing water infrastructure.

In embarking on the development of the next Basin Plan, it is crucial to recognise that major programs under the current plan remain unfinished but are fundamentally important to prioritise in parallel with the development of a new plan. These programs include water recovery, constraints relaxation and water resource plan accreditation. We also recommend significantly revising the water offsets program to ensure it delivers genuine environmental outcomes both locally and at Basin scale (see Action 5 in the Blueprint).

Below we summarise some of the key gaps and priorities for consideration. Further detail related to each issue and the recommended solutions is provided in the attached Blueprint.

[1] Walker, B. *Murray-Darling Basin Royal Commission Report*. (2019).
[2] Productivity Commission. *Murray-Darling Basin Plan: Five-Year Assessment, Final Report No. 90*. www.pc.gov.au (2018).
[3] Murray–Darling Basin Authority. *2026 Murray–Darling Basin Plan Review: Discussion Paper*, (2026).

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1. The MDBA proposal to delay climate change adaptation ignores best available science and increases costs and the risk of avoidable harm.

The MDBA discussion paper identifies climate change as a current threat and key driver of future risk, including reduced inflows, increased variability, and more frequent extreme events (p. 33)[3]. It also recognises that adaptation will require difficult trade-off decisions. However, the discussion paper also states: "The Authority has considered climate change. Given the wide range of plausible climate futures, the Authority is not proposing changes to the Sustainable Diversion Limits (SDLs) in response to climate change in 2050 through this review" (p. 7)[3].

The MDBA's recommendation to postpone necessary climate change action ignores the best available science on current and future threats. The current Basin Plan does not account for climate change, and existing water sharing arrangements are not viable under current and future climate conditions. There are many examples highlighting this issue[4] (see Box 2).

The discussion paper does not address these problems nor provide for adaptive responses to climate change. Climate change is effectively treated as a future consideration, with no substantive policy adjustment or proposed strategy. The discussion paper is reductionist in its approach to addressing climate change, and fails to propose pro-active measures or account for the precautionary principle. For example:

- Of the 29 SDL surface water resource units assessed, the MDBA identified the need to potentially adjust SDLs for only eight of those (p. 24)[3], ignoring dependencies on upstream flows. For example, the Barwon-Darling watercourse is at risk of not meeting the environmental outcome for native fishes due to 'pattern of flow' (p. 28)[3]. However, the MDBA proposes that SDLs for upstream surface water units which contribute flows to the Barwon-Darling (including Condamine-Balonne, Qld & NSW Border Rives, Namoi and Macquarie – Castlereagh) are to be maintained[3].
- Drought is identified as a critical risk, with consideration given to strengthening planning for critical human needs, but without clarity on priorities for critical environmental needs as per the hierarchy in the *Water Act*[5];
- Potential adjustments to outcomes for key systems such as the Coorong, Lower Lakes and Murray Mouth (CLLMM) are noted, but are not defined or supported by analysis and policy options. Sea level rise and decreased rainfall in the southern half of the Basin under climate change conditions will require a review of management options to prevent the long-term degradation of the end of system.[6]

Without a credible plan and measures to address climate change, Basin communities are given a false sense of security, critical interventions are delayed, maladaptation is more likely and the transition is more costly. Further delays in addressing climate change will erode the capability of Basin communities to adapt to climate change and increase long-term risks to the Basin's social, environmental and economic values.

The system-wide implications of climate change are also not adequately assessed. Reduced surface water availability, combined with increased temperatures and evaporation, will increase demand across all water users. Limits on surface water diversions and inadequate groundwater SDLs are likely to drive unsustainable groundwater extractions, particularly during drought conditions. While

[4] Pittock J, Williams J, Grafton Q. *The Murray-Darling Basin Plan fails to deal adequately with climate change.* Australian Water Association. (2015).

[5] Walker, B. *Murray-Darling Basin Royal Commission Report*. (2019).

[6] Thom B, Rocheta E, Steinfeld C, Harvey N, Pittock J, Cowell P. *The role of coastal processes in the management of the mouth of the River Murray, Australia: Present and future challenges*. River Res Applic. (2020); 36:656–667. https://doi.org/10.1002/rra.3551

the interaction between surface water and groundwater systems is acknowledged, the implications of this shift are not clearly assessed or modelled. Without recognition of the integrated nature of climate change impacts and new approaches to groundwater SDLs (see Blueprint Actions 8, 9 and 10), there is a risk of unintended consequences, including increased pressure on groundwater systems and impacts on connected river systems.

Box 2. Five examples highlighting why the Basin Plan does not account for climate change

1. SDLs are historical modelled average volumes based on 1895-2009 conditions, not likely future conditions under climate change. The Guide to the Basin Plan proposed a 3% climate adjustment for all SDLs, but this measure was abandoned prior to the adoption of the Basin Plan by the Commonwealth Parliament in 2012.
2. When assessing the available water for allocations, an assumption is made about how much water will flow into a dam during a water year. Water is allocated against future anticipated inflows, even if that water has not fallen in the catchment. This is a risky strategy and has resulted in water sharing plans being suspended in drought years.
3. Impacts of climate change are felt disproportionally by the environment. That is, planned environmental water is more severely impacted by climate change compared to held entitlements.
4. There are inconsistent approaches to ensuring sufficient drought reserves across regulated rivers in the Basin. Some Basin towns run out of potable water during droughts.
5. There is no climate change adaptation strategy for the Basin which supports communities and ecosystems to adjust, addresses the cumulative impacts of climate change and other threats, and supports better integration of land and water stewardship.

More broadly, the discussion paper does not match the scale or urgency of the challenges it identifies. The overall approach is a focus on incremental adjustments rather than the structural reform required to respond to ongoing ecological decline and climate change.

Without clear signals and forward-looking policy settings, communities and industries are less able to anticipate and prepare for change. This increases the likelihood of abrupt and disruptive adjustments as climate impacts intensify. A more proactive approach is required, one that embeds climate change across all aspects of the Basin Plan and provides clear direction to support adaptation. Our Blueprint sets out practical recommendations to achieve this.

2. The discussion paper does not yet provide a clear or adequate pathway to recognise and enable Aboriginal water rights and stewardship

The discussion paper acknowledges the importance of Aboriginal peoples' connection to water and Country, and the need to strengthen their role in Basin governance and management. However, it does not set out a clear pathway to translate this recognition into substantive reform. In particular, it does not establish how Aboriginal Peoples will be enabled to exercise water rights, participate in decision-making, or access the water and resources required to care for Country.

The current approach remains largely framed around engagement and participation, rather than rights, authority and outcomes. Without explicit mechanisms to recognise Aboriginal water rights and support self-determined water management, there is a risk that existing inequities will become further entrenched.

The discussion paper also does not outline how water access for Aboriginal Peoples will be increased, how trade-offs will be addressed, or how responsibilities and authority will be shared across jurisdictions. Nor does it address the scale of investment required to support Aboriginal Peoples to care for Country and deliver long-term outcomes.

A more comprehensive approach is required that moves beyond consultation towards genuine partnership, shared decision-making, and water rights for Aboriginal peoples. This should include clear policy options to increase Aboriginal water holdings, embed Aboriginal governance in Basin institutions, and support long-term investment in cultural and environmental water management.

The Blueprint identifies the need for structural reform to embed Aboriginal peoples as decision-makers in water governance and to support access to water for cultural, environmental and economic purposes. This includes recognising Aboriginal peoples' rights and interests in water, providing secure and adequate water entitlements, and establishing governance arrangements that enable Aboriginal-led planning and management (see Blueprint Reform 3). It is also to consider the importance of Aboriginal ownership of wetlands.

3. Gaps in the review process: limited policy options and incomplete consultation

The Basin Plan review, required under the *Water Act*, is intended to assess the effectiveness of the Plan in achieving its core purpose: the integrated and sustainable management of Basin water resources. Within this legislative framework, it is incumbent upon the Murray–Darling Basin Authority to draw on the best available scientific evidence and translate this evidence into clearly defined, credible policy options across a range of future scenarios.

While the discussion paper provides a useful articulation of the key issues facing the Basin, it does not provide a coherent vision for the Basin, nor specify proposed goals and objectives. It also fails to identify credible policy options under different future scenarios, and an assessment of the benefits and trade-offs associated with those approaches. These shortcomings limit its effectiveness as a foundation for informed decision-making and leaves the MDBA with insufficient evidence upon which to base or justify their decisions.

This limitation is compounded by the shortcomings in the consultation process. Currently, stakeholders are invited to provide input on issues and high-level considerations, while key decisions and policy responses are deferred to a later stage, with no plan for consultation. This issue creates a gap between consultation and MDBA's final reporting to the Federal Water Minister. Without access to modelled options and associated trade-off analysis, stakeholders are not in a position to provide views on the specific policy proposals that will shape the next Basin Plan.

The next phase of the review should therefore focus on setting out measurable, outcome-based objectives that are aligned with the legislative requirements at a minimum, then develop, test and clearly communicate policy options to achieve the specified outcomes, evaluate the implications and trade-offs associated with each and provide opportunities for public consultation on the options.

4. Governance and system-wide challenges

The discussion paper reflects a narrow interpretation of the Basin Plan review, with limited consideration of broader system dependencies. Several key issues are not adequately addressed including:

- the need for coordination across government portfolios, including biodiversity, climate, infrastructure and regional development;
- the role of cross-jurisdictional collaboration in delivering outcomes;

- the implications of fragmented management arrangements across the Basin.

Current governance arrangements remain fragmented, with river systems managed across multiple jurisdictions with differing priorities. This situation limits the ability to deliver coherent, Basin-wide outcomes and weakens accountability for achieving them.

There is also limited consideration of opportunities for broader collaboration, including with Aboriginal Peoples and programs that deliver multiple environmental and social benefits. These opportunities are central to achieving durable, long-term outcomes but are not sufficiently developed in the discussion paper.

A more integrated, whole-of-government approach is required to address these challenges, supported by clearer articulation of roles, responsibilities and dependencies across jurisdictions and policy domains (see Blueprint, Reform 5).

5. Conclusion and way forward

The MDBA's discussion paper provides an overview of the challenges facing the Basin and represents an important step in the review process. However, it does not present a scientifically-sound, outcome-based, or adaptive framework to address those challenges.

To meet the intent of the Water Act 2007 and ensure the Basin Plan is lawful and remains effective under future conditions, the review should move beyond issue identification and towards clearly defined policy options that give effect to the national and international obligations upon which these legislative instruments are based. The review must also be grounded in evidence and supported by transparent analysis.

The Wentworth Group is proposing urgent policy reforms that would achieve these outcomes, including embedding climate change into decision-making, re-focusing the Plan on measurable outcomes, and enabling stakeholders to engage meaningfully in the review process to shape the next Basin Plan. The actions proposed in our *Blueprint for the next Murray–Darling Basin Plan* provides a realistic and credible foundation for this important endeavour.