



Victorian  
Farmers  
Federation

Submission to the Murray Darling Basin  
Authority on 2026 Murray Darling Basin Plan  
Review Discussion Paper

April 2026

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## Foreword

The VFF objective is for the MDBA's recommendations arising from the Basin Review lead to amendments to the Basin Plan that:

- Improve environmental outcomes
- Pause water purchases in the Southern Murray
- Support efficient and high value agriculture, associated secondary industries, regional employment and community stability.

The MDBA's Review process must be revised to require the MDBA to release a draft review report with recommendations that presents clear proposed actions, responsibilities, costs and funding sources for comment.

The VFF notes that the Basin Plan Review is being undertaken when water resource plans for the surface and groundwater resources for the Gwydir and Namoi basin are still to be finalised. Yet the Review paper has little to say about this and the Inspector General for Water Compliance appears to have had little influence. This situation undermines the VFFs confidence in the MDBA's management of the Basin Plan.

The MDBA's Basin Plan Review recommendations should:

- Support food production, industries, jobs, and communities alongside environmental goals.
- Support genuine community consultation on Basin Plan options, considering environmental, economic, and social trade-offs at regional and local scales.
- Propose tangible measures to mitigate the adverse effects of Commonwealth water purchase on the resilience of irrigated agriculture in the Southern Basin to the drought and climate change.
- Cease water purchases from the Southern Basin and maximise the environmental outcomes from already available environmental water with works and measures.
- Prioritise works and measures that support the efficient use including:
  - VMFRP and other works to connect rivers to their floodplains
  - fishways to support native fish populations including in the lower Darling
  - infrastructure proposed by SA to enhance the environmental values of the south lagoon of the Coorong to reduce the need for buybacks
  - ongoing dredging the Murray Mouth to reduce need buybacks
- Support the assessment of wetland and river environmental objectives, works, measures and implementation at local scales involving active local participation that balances environmental and community outcomes.
- Ensure funding Basin Plan implementation is not at the expense of funding works to maintain and refurbish joint venture assets that are critical for supplying Murray water entitlements for consumption and the environment (e.g. Hume and Mildura Weir).

- Reflect agreed implementation costs, budgets, funding sources, and cost sharing between the Commonwealth and States (No increase to irrigator fees and charges).



**Brett Hosking**

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Working Draft

## Background to VFF

The Victorian Farmers Federation (VFF) is the only recognised consistent voice on issues affecting rural Victoria and we welcome the opportunity to comment on the 2026 Murray-Darling Basin Plan Review Discussion Paper.

Victoria is home to 25 per cent of the nation's farms. They attract neither government export subsidies nor tariff support. Despite farming on only three per cent of Australia's available agricultural land, Victorians produce 30 per cent of the nation's agricultural product. The VFF represents the interests of our state's dairy, livestock, grains, horticulture, flowers, chicken meat, pigs and egg producers.

The VFF consists of a seven person Board of Directors, a member representative Policy Council to set policy and eight commodity groups representing dairy, grains, livestock, horticulture, chicken meat, pigs, flowers and egg industries.

Farmers are elected by their peers to direct each of the commodity groups and are supported by Melbourne-based and regionally located staff.

## Irrigation in Northern Victoria

Northern Vic is one of Australia's most important food producing regions. While it only makes up 9% of the geographic landscape in the Murray-Darling Basin at 12 million hectares, it has:

- the highest agricultural output at \$14.5 billion.
- largest agricultural value add at \$6.6 billion
- the highest food manufacturing output at \$9 billion.

This agricultural output is directly related to the amount of high reliability water available for irrigation. Reductions in the amount of water available for irrigation directly reduces production, food processing and associated employment. The loss of jobs erodes the very fabric of our local communities.

Northern Victoria is the most highly populated area of the Basin, with people choosing to live and invest here as a result its highly secure water products, fertile soils and access to the largest irrigation network in Australia. Our high agricultural output has led to the largest food manufacturing footprint in Australia.

The intensity of irrigated agricultural and the economic importance of the supply chains mean that the reduction in water availability has high economic and social costs in Northern Victoria.

The MDBA's Discussion Papers says little about the future of irrigation, Basin communities, or the socio-economic effects of Basin Plan water reforms. In the absence of a defined vision and concrete actions to support irrigated agriculture, the Basin Plan risks diminishing community confidence and discouraging future investment in this sector.

The Commonwealth Government's National Food Security Discussion Paper, states:

*"Water security is also crucial to balance risks and opportunities enabling ongoing food availability for domestic consumption and exports" Pg 10<sup>1</sup>*

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<sup>1</sup> <https://haveyoursay.agriculture.gov.au/food-security-strategy> Pg 10

The Basin Plan has been at odds with this Commonwealth statement by reducing the volume of secure water available for irrigation in Northern Victoria and the Basin as a whole.

The Commonwealth's water buyback policies are being progressed without sufficient alignment with broader national objectives relating to food production, regional economic stability and supply chain resilience.

There must be a stronger focus on recognising the lived experience of Basin communities. Too often, decisions are shaped by those outside the region who do not fully understand the real-world impacts on people, businesses, and communities.

***Recommendation:***

***The Basin Plan Review must be better integrated with agriculture, food security, regional development and trade policy. It must provide greater acknowledgement of the 'lived experience' of those in the Basin.***

## The Basin Plan Review Process

The communities across Northern Victoria are very concerned about the way the review process is being conducted.

The MDBA's discussion paper does not include proposed recommendations or positions. It rather provides some high-level direction and suggestions but few clear positions it will be recommending to the Commonwealth.

The VFF cannot assess the Review's impact on its members. Without clear options, recommendations, or analysis of trade-offs, communities find it is impossible to give meaningful, informed feedback.

A good faith engagement process consists of two steps: first, releasing a discussion paper for submissions; second, presenting a draft review paper outlining recommendations with their rationale and potential impact.

The Basin Plan review process must be improved to build trust, partnerships and ensure lasting reform. Communities require clear information on policy proposals, potential impacts, and alternatives. Public regional forums, transparent timelines, and inclusive consultation are essential. Without these steps, confidence in the Basin Plan will decline further.

***Recommendation:***

***The Basin Plan Review process be revised to include an additional step, where the MDBA releases a draft review report with recommendations that provides clear actions, responsibilities and costs for comment.***

## Sustainable diversion limit (SDL) accounting and reporting

The Basin Plan establishes enforceable Sustainable Diversion Limits (SDLs) to ensure enough water is retained to support river systems and environmental outcomes.

The VFF supports the MDBA’s position that the current SDL limits for the Southern Basin are appropriate. The VFF would oppose any reduction the SDLs for the Southern Basin.

**Recommendation: *The Basin Plan Review* recommendations do not reduce the SDLs for the Southern Basin.**

## The effect of Basin Plan implementation

### Water recovered for the environment

Water recovered for the environment can no longer be used for agricultural production and all the economic activities this involves.

The volume of water recovered is summarised in Table 1 below.

**Table 1 Water entitlements recovered in the Southern Murray**

State	Total Entitlement	Amount purchased for Environment	% Returned to Environment
<b>High reliability water entitlements</b>			
VIC	2,490	570	23%
NSW	561.8	41.4	7%
SA	608	101.55	17%
<b>General security entitlements</b>			
NSW	3,645.6	546.6	15%
<b>Low reliability water shares</b>			
VIC	842.8	69.5	8%
NSW	240.9	40.1	17%
SA	0	n.a.	n.a.

High reliability water entitlements support higher value irrigated agriculture than low reliability water entitlements.

Points to note from Table 1 include that the Commonwealth has purchased a disproportionate amount of Victorian high reliability water shares compared to:

- Victorian low reliability water shares
- NSW high reliability water shares
- South Australian high reliability water shares.

This means that the northern Victorian irrigation sector has suffered greater economic damage from Commonwealth water acquisition than either NSW or South Australian. A fair Commonwealth government would purchase a similar proportion of high reliability water shares from each State.

The MDBA’s 2023-2024 report on SDL compliance report shows that Victoria significantly underused water in the Murray (248.44 GL) and Goulburn (372 GL) Rivers again. Both systems

had large cumulative SDL credit balances going into 2024-25 – Murray 1,147.25 GL and Goulburn 1,848.01 GL. These results highlight that the Commonwealth water recovery targets are at best misleading. Compliance with the SDLs is what matters.

The SDL compliance reports provide strong evidence that the Commonwealth has recovered too much water.

## Water markets

Commonwealth water purchases have increased the price of water entitlements and the price of water on the temporary water market. This is a simple matter of supply and demand.

Commonwealth buybacks have reduced the supply of water on the market causing prices to rise. This has been found by numerous reports including by ABARES found that:

*“buybacks reduce the supply of water available for irrigation so therefore increase allocation prices”*

Increasing water entitlement and allocation prices may benefit those who sell water but are a significant challenge to farmers who wish to continue to irrigate, particularly during droughts when prices become unaffordable for many irrigators.

## Reduced water deliveries and effect on irrigation infrastructure

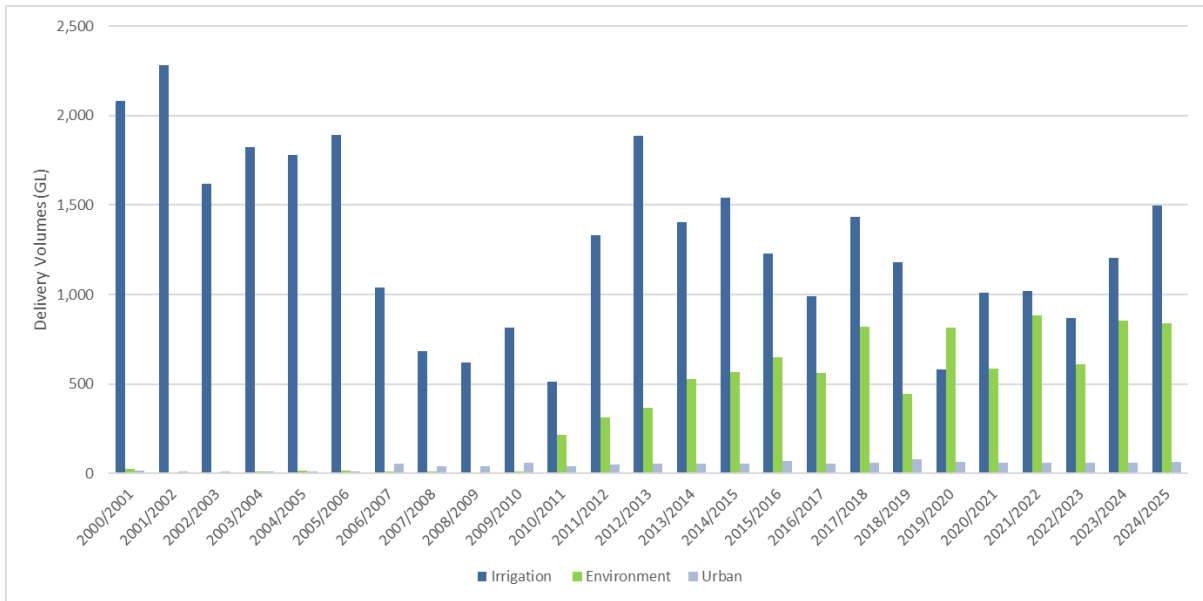
Victoria’s irrigation infrastructure consists of very extensive networks of pipes and channels to deliver water to irrigators, domestic and stock customers, some towns and some industries. The costs of operating and maintaining the networks are funded by the customers. The infrastructure and their costs are largely fixed (i.e. they do not significantly vary with the amount of water delivered).

Only a very small proportion of environmental water deliveries are made by Victoria’s irrigation network, most of the environmental water is directly released from storages into rivers.

Figure 1 shows that Commonwealth water buybacks have substantially reduced the amount of water delivered in the Goulburn Murray irrigation District (GMID). Irrigation deliveries have approximately halved from around 2,000 GL before the Millennium drought between 2006 to 2011 to less than 1000GL in recent years.

Many irrigation properties have been dried off. This means that the fixed costs of the irrigation networks must be paid by a smaller number of customers, increasing each of their costs.

Figure 1 also shows that 2019/20 was the first time that environmental deliveries were greater than irrigation deliveries.

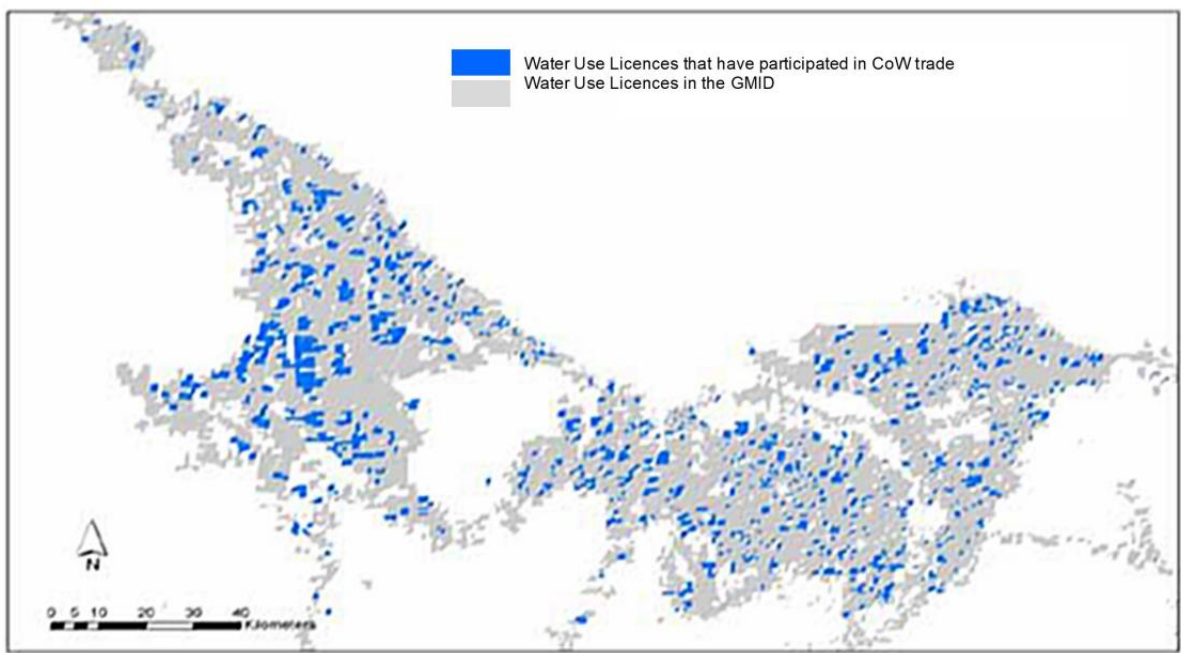


**Figure 1 Consumptive and environmental water deliveries in the GMID.**

Decreasing water deliveries threatens the viability of the water authority because the fixed costs of the irrigation networks must be paid by a reduced number of customers, Lower Murray Water in the Mallee faces similar issues.

Figure 2 shows where the Commonwealth has bought water from the GMID. It clearly shows that water buybacks have been spread across the GMID offering few opportunities to reduce GMID’s infrastructure and therefore costs. The network is becoming increasingly inefficient in terms of cost per megalitre of water delivered. Nearly all the network is still needed to supply irrigators that remain and to supply domestic and stock water. There have been very limited opportunities to rationalise the network to reduce costs and improve delivery efficiency.

Since 2007, the Goulburn Murray Irrigation District has been modernised at a cost of \$2 billion. These works helped to shelter farmers from increased costs because of less farmers using water. However, with the recommencement of buybacks in 2023, farmers are concerned modernised irrigation infrastructure assets will be stranded and there will be less farmers to pay for it.



**Figure 2 Location of Commonwealth water purchases in the GMID**

To address declining water deliveries across Northern Victoria and its remaining irrigation footprint, the VFF support the 'Planning Our Basin Future Together' proposal by the Victorian Government that would see a 'system-by-system community led investigation into the viability of each area.

**Recommendation:**

***The Basin Plan Review recommends the Commonwealth fund the Business Case for 'Planning Our Basin Future Together' proposal.***

## Implications of drought

Economic evaluations typically assign a low cost to reducing the amount of irrigation water, but this overlooks the dynamic nature of irrigation water use.

Irrigation in the southern Murray region supports:

- Annual operations such as cropping that are relatively low value and which can readily adjust the areas cropped to match water availability.
- Semi-permanent operations, such as dairy farms, possess some flexibility to adapt to occasional dry years by purchasing water from croppers or acquiring additional fodder. However, these periods can result in considerable financial challenges.
- Permanent agricultural operations such as horticulture. These operations must have water every year if catastrophic losses are to be avoided.

Water acquired by the Commonwealth has usually been sourced from lower-value cropping businesses. As a result, there is less water available for semi-permanent and permanent agricultural activities during dry periods, which impacts the resilience of irrigated agriculture in the face of drought and climate change.

The impacts of future droughts such as the Millennium drought will be much more severe because of Commonwealth water acquisition.

**Recommendation:**

***The Basin Plan Review recommends tangible measures to mitigate the adverse effects of Commonwealth water purchase on the resilience of irrigated agriculture in the Southern Basin to the drought and climate change.***

## The effect of reduced irrigation on food processing and employment

Commonwealth water buybacks have reduced the amount of high reliability water shares available for irrigation by 570,000 ML.

Table 2 provides estimates of the potential production that would be possible with these entitlements based on the conservative assumption that the water shares were used for a mix of horticulture (20%), dairy (30%) and cropping (50%). The estimates in the table are based on advice from experienced irrigators. The VFF would welcome the MDBA engaging consultants to work with the VFF to make more rigorous estimates.

Table 2 Estimates of the opportunities lost in the GMID by the Commonwealth water buybacks

Crop type	Volume (ML)	Area (ha)	Value (\$) Gross Value Irrigated Agricultural Production (GVIAP)
Horticulture	114,000	1,140	\$15.4m
Dairy	171,000	19,000	\$43.1 <sup>2</sup> m
Cropping	285,000	40,714	\$253.5m
<b>Total</b>	<b>570,000</b>	<b>60,854</b>	<b>\$312m loss in GVIAP</b>

The estimates in Table 2 indicate that Commonwealth buybacks have had a major effect on the potential for irrigation, production in northern Victoria.

This has impacted employment on farms as well as the processing sector. A recent report by Ricardo in 2025 on the dairy industry found that if an additional 600GL was purchased this would result in a \$550 million loss in dairy processor revenue.

Dairy farms across Northern Victoria produce over 80% of milk in the Basin, they employ 3,000 people on farms, a further 3,500 in processing and more than 6200 are employed in related industries.

The horticulture industry also has high levels of employment particularly at times of harvest. With less water to grow their crops, a decline in horticultural farms will see a decline in jobs.

## Water buybacks and environmental outcomes

The VFF promotes a healthy environment but never at the cost of healthy communities.

The VFF strongly opposes the water recovery targets in the Basin Plan and the Commonwealth's approach of simply adding water to achieve environmental outcomes.

The VFF notes out that the MDBA's Basin Plan Discussion Paper relies on 'Sustainable Diversion Limit (SDL) Assessments' to gauge the effectiveness of current SDLs in supporting the environmental objectives of the Basin Plan river systems.

The MDBA's analysis has evaluated the likelihood of achieving environmental outcomes across six themes under two scenarios: no further environmental water recovery and an additional 550 GL of water recovery to meet the 450 GL target and the 605 GL offset target.

The MDBA's assessment uses likelihood ratings: likely, more likely than not, about as likely as not and unlikely. Additional water purchases aren't justified unless the likelihood rating changes. However, they might be justified if the additional water purchase shifts the assessment from unlikely to about as likely as not, considering the social and economic impacts.

The MDBA's assessments are summarised in Appendix 1. The assessment shows that with additional water purchases:

- There is no change in the likely achievement of environmental objectives in any of Victoria's northern rivers including the Murray River.
- There are improvements in three environmental themes in the NSW Murrumbidgee but these were already rated as 'at least as likely as not',

<sup>2</sup> \$43.1m is based on ABARES analysis, however the ABARES dataset pooled dairy with livestock industries, we anticipate this number would be much higher if ABARES had separated out the dairy industry.

- Additional water purchases did not change the likelihood ratings for the Lower Darling and Lachlan rivers.
- In the South Australian Murray:
  - three categories improved from ‘more likely as not’ to ‘likely’
  - one category moves from ‘as likely as not’ to ‘more likely as not’
- In northern Basin additional water purchases improved the likelihood rating in 6 out of 90 categories but no improvement in categories that were rated as ‘unlikely’.

The VFF contends that additional water purchases with their associated costs to communities are not justified if it is ‘more likely than not’ that the environmental objectives are achieved and if additional water purchases do not change the likelihood rating.

Overall, the MDBA’s assessment of the effects of additional water purchases on environmental outcomes does not justify additional water purchases.

## Ceasing water purchases in the Southern Basin and focus on environmental outcomes

### Ceasing buybacks

The Commonwealth has prioritised water recovery targets in the Basin Plan despite the social and economic costs of water buybacks. The Basin Plan Review discussion paper finally acknowledges that other factors, not just more water, are hindering environmental progress in the southern Basin.

#### **Recommendation:**

##### ***The Basin Plan Review recommend that:***

- ***water purchases from the Southern Basin cease and environmental outcomes from already available environmental water are maximised with works and measures***
- ***funding for water buybacks be redirected to complementary works and measures to optimise environmental outcomes***
- ***environmental outcomes to meet Basin Plan objectives are achieved by practical works and measures that are supported by regional/local communities.***

The Goulburn Broken Catchment Management Authority has advised that the water already recovered for the environment in the Goulburn catchment cannot be effectively delivered. Consequently, the focus should now shift to complementary works and measures to efficiently utilise the available environmental water rather than volumetric water buyback targets.

The Review provides an opportunity to divert investment from water buybacks to works and measures that optimise environmental outcomes and support economic and social outcomes.

Catchment management authorities working with water corporations, traditional owners and local communities should be funded to develop local environmental management objectives and complementary works and measures to deliver cost effective environmental outcomes. The local environmental management objectives should be based on multiple lines of evidence and have regard to trade-offs between environment benefits and costs. Projects should have strong local support to build partnerships and support for the MDBA and Basin Plan.

#### **Recommendation:**

***The Basin Plan Review recommends that Catchment Management Authorities (CMAs) be funded to collaborate with local stakeholders to develop works and measures to optimise the use of environmental water to achieve local environmental outcomes.***

## Works and measures in Victoria

The Basin Plan relies on the Sustainable Diversion Limit Adjustment Methodology (SDLAM) developed in 2012 to account for the environmental benefits of some works and measures. However, the methodology does not use contemporary scientific information and does not include the environmental benefits achieved in many of the rivers in the Basin that benefit from improved watering regimes.

The MDBA's methodology for assessing the likely environmental impacts of the SDLs might be more suitable moving forward.

Victoria is in the process of developing and implementing several works and measures to improve the environmental outcomes from the environmental water that is already available. However, the Basin Plan sets timelines that current projects are unlikely to meet. The projects include the:

- Victorian Floodplain Restoration Project
- Constraints Relaxation
- Broken Reconfiguration Project
- Coliban Rural Modernisation Project
- Lake Eppalock Outlet Enlargement project
- GMID Resilient Water program

Victoria identified 9 VMFRP sites, three are being funded by the Commonwealth that will protect 2,047 hectares of wetlands. However, a further 5 projects that that could protect an additional 11,744 hectares require the Basin Plan to be amended to extend the deadline for these works to be built.

Victoria has completed feasibility studies to relax constraints along the Goulburn and the Murray between Hume Dam and Wakool. The VFF does not support the flooding of private land as part of Constraint relaxation.

### **Recommendation:**

#### **The Basin Plan Review should recommend that:**

- ***the timelines and funding for delivering various complementary works and measures be extended***
- ***new complementary works and measure projects may be developed and considered for funding.***
- ***new projects do not involve the flooding of private land without landowner agreement***

## The Lower Lakes and the Coorong

A fundamental objective of the original Basin Plan coming out of the Millenium Drought was to protect the Coorong and to keep the Murray Mouth open. Purchasing water to increase flows seem to be the solution. Since then, further investigations undertaken by the South Australia have concluded that dredging of the Murray mouth will need to continue, further water recovery is not the solution.

South Australia, with Commonwealth support, have also undertaken detailed investigations into improving the environmental values of the southern lagoon of the Coorong. The most promising option appears to be to pump sea water into the lagoon to prevent hyper saline conditions from developing.

These developments show that works and measures can optimise environmental outcomes while avoiding the damage to agriculture and regional communities caused by Commonwealth water buybacks.

## Native Fish:

The Basin Plan review has failed to offer any tangible response to the environmental damage caused by Carp. An effective response to Carp would improve the environment and benefit recreational fishing. The VFF supports actions that address the carp problem rather than actions that damage agriculture and regional communities.

**Recommendation: The Basin Plan review recommend practical responses to the carp problem rather than promoting actions that damage agriculture and regional communities.**

## Efficient operation of the Murray

The continued supply of water from the Murray for irrigation and the environment depends on maintaining and when necessary, refurbishing the Joint Venture headworks assets operated by the MDBA under the Murray-Darling Basin Agreement.

The MDBA has forecast that significant investment will be required to refurbish the Hume Dam trash racks and to replace the Mildura Weir. The investment required are forecast to be well more than the 'business as usual' funding of Murray River operations.

The Commonwealth and State governments have significant budget limitations. It is critical that expenditure on Basin Plan implementation is not at the expense of providing sufficient funding to make necessary investment in Joint Venture assets.

### **Recommendation:**

***The Basin Plan Review recommends that funding the implementation of its recommendations are not at the expense of funding the Murray River operations.***

## Partnering at the local level

Many regional communities believe the problems they have identified about how Commonwealth water acquisitions for the Basin Plan have been overlooked by both the Commonwealth and the MDBA. The failure to provide constructive solutions to these problems has eroded trust and eliminated prospects for a productive partnership.

We all know that water and the environment can never be managed by bureaucrats in Canberra, local partnerships and support is essential.

Sustainable food production and environmental stewardship are not competing priorities in Northern Victoria — they are fundamentally interconnected.

Policies that overlook the importance of productive agriculture undermine the stewardship necessary to achieve enduring environmental results. An effective Basin Plan should engage collaboratively with local land managers and acknowledge the interdependence of healthy waterways, resilient regional communities, robust employment, and national food security.

**Recommendation:**

***The Basin Plan review should focus on rebuilding trust with farmers and rural communities, who make daily environmental decisions as the Basin's primary land managers.***

## Northern basin

The public's perception of the poor health of the Murray-Darling Basin is frequently shaped by fish kills and poor water quality in the Darling River. The challenges of managing floodplain harvesting in the northern Basin are also a regular focus.

These incidents and challenges overshadow the substantial progress made in improving the environmental condition of the Murray and Goulburn Rivers, the Living Murray floodplain sites and other Victorian tributaries.

Therefore, the VFF would support recommendations that:

- Reduce the frequency and severity of fish kills and water quality incidents
- Improve the longitudinal connectivity in the northern basin

The VFF is concerned to ensure any recommendations to change the operation of the Menindee Lakes do not decrease the reliability of Murray water entitlements or increase the risk of delivery shortfalls in the Murray.

**Recommendation:**

***The Basin Plan recommends that reduce the risk of fish kills and water quality incidents in the Northern Basin including the Lower Darling River.***

## Critical Human Water Needs:

The Discussion Paper touches on ensuring critical human water shortages in the Northern Basin and the need for additional planning through improved water resource plan requirements.

The VFF does not support this approach, the management of critical human water needs is a State function. The Basin Plan plays a role along the Murray River due to all 3 Murray River States accessing water for critical human needs from the Murray River.

**Recommendation: *The Basin Plan reinforces the States role to secure critical human water needs and resist calls for the Basin Plan and MDBA to have an expanded role.***

## Streamlined institutional arrangements and low administrative costs

The Basin Plan Review discussion paper proposes several welcome changes to Basin Plan implementation. However, it fails to tell us who is responsible for the actions, and it fails to present a practical pathway for getting them agreed and implemented.

The MDBA and Commonwealth's accountabilities remain unclear. Similarly, the respective responsibilities of the Commonwealth, MDBA and states for implementing the Basin Plan and managing water and catchment resources are also unclear.

This review provides an opportunity to clarify roles responsibilities and accountabilities. These must be agreed upon for the Basin Plan to be effectively implemented.

In summary the responsibilities for managing the Murray-Darling Basin are

- The Commonwealth:
  - Adopts the Basin Plan
  - Sets SDLs and funds the measures required to implement the SDLs
  - Holds and funds water entitlements held by the Commonwealth Environmental Water Holder and monitors and reports on the use of this water
  - Enters into bilateral agreements with states to fund works and measures to implement the Basin Plan.
- The MDBA:
  - Advises the Commonwealth on the operation of the Basin Plan
  - Operates the Murray River and maintains Joint Venture Assets in accordance with the Murray-Darling Basin Agreement
  - Note that the MDBA has no direct operational responsibilities for managing catchments and wetlands
- The Inspector General of Water Compliance:
  - Undertakes compliance audits
  - Enforces compliance with the Murray–Darling Basin Plan
- The Bureau of Meteorology:
  - Collates and stores various water data collected by the States
  - Prepares rudimentary water accounts for the Basin
- The States and their agencies:
  - Comply with the SDLs set by the Basin Plan
  - Undertake various planning and reporting functions
  - Manage their water resources consistent with the limits specified by the Basin Plan
  - Ensure reliable water supplies to their citizens
  - Manage water quality
  - Manage wetlands, waterways and land within their territories

The VFF would not support any expansion of the role of the Commonwealth or MDBA.

**Recommendation:**

**The Basin Plan Review recommendations should promote:**

- **Clear accountabilities with roles and functions of the Commonwealth and the MDBA reduced, based on the principle of subsidiarity**
- **The removal of duplication and overlaps between the Commonwealth, MDBA and the States and the narrowing the MDBA focus to its Murray-Darling Basin Agreement roles and functions**
- **Regulations and processes that are proportionate to risks, benefits and costs**
- **Flexibility and the minimisation of prescriptive rules**

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## Appendix 1 Likelihood of environmental objectives are met by SDLs

The MDBA's Basin Plan Discussion Paper relies on 'Sustainable Diversion Limit (SDL) Assessments' to indicate how effective current SDLs are likely to support Basin Plan environmental objectives for the Basin Plans River systems. The MDBA's assessment has considered likelihood of achieving six environmental outcomes if:

- 1) No more environmental water recovery; and
- 2) Full implantation of the Basin Plan which could see around a further 550 GL of water recovered to achieve the 450 GL target and the 605 GL offset target.

The six environmental themes are:

- 1) Flows and connectivity.
- 2) Ecosystem functions.
- 3) Waterbirds.
- 4) Native fish,
- 5) Native vegetation.
- 6) Other species.

The MDBA's assessment uses the following likelihood ratings:

- 1) Very Likely
- 2) Likely.
- 3) More likely than not.
- 4) About as likely as not.
- 5) Unlikely.
- 6) Very Unlikely

There is no justification for additional water purchases if there is no change in the likelihood rating. The tables below summarises the MDBA's results. The data in the tables show that:

- Across the Basin, the MDBA assessed 115 environmental indicators, only 13 or 11 per cent show any marginal improvement if additional water is recovered.
- There is no change in the likely achievement of environmental objectives in any of Victoria's northern rivers including the Murray River.
- There are improvements in three environmental themes in the NSW Murrumbidgee but these were already rated as 'at least as likely as not', but additional water purchases did not change the likelihood ratings for the Lower Darling and Lachlan rivers.
- In the South Australian Murray:
  - three categories improved from 'more likely as not' to 'likely'. Additional water purchases are not justified if it is already more likely than not that the environmental objectives are achieved
  - one category moves from 'as likely as not' to 'more likely as not'
- In the Northern Basin additional water purchases improved the likelihood rating in 6 out of 44 categories but no improvement in categories that were rated as 'unlikely'.

Overall, the MDBA's assessment does not justify additional water purchases.

**Full Reports can be found here:** <https://library.mdba.gov.au/group/sustainable-diversion-limit-assessments-surface-water>

**Table 1. MDBA assessment of Victorian Basin Plan areas:**

<b>System</b>	<b>Flows &amp; Connectivity</b>	<b>Ecosystem Function</b>	<b>Waterbirds</b>	<b>Native Fish</b>	<b>Native Vegetation</b>	<b>Other Species</b>
<b>Murray VIC</b> No new buybacks	About as likely as not	About as likely as not	More likely than not	About as likely as not	More likely than not	More likely than not
<b>Murray VIC</b> Extra buybacks (full implementation)	About as likely as not	About as likely as not	More likely than not	About as likely as not	More likely than not	More likely than not
<b>Goulburn</b> No new buybacks	About as likely as not	About as likely as not	More likely than not	More likely than not	About as likely as not	More likely than not
<b>Goulburn VIC</b> Extra buybacks (full implementation)	About as likely as not	About as likely as not	More likely than not	More likely than not	About as likely as not	More likely than not
<b>Campaspe</b> No new buybacks	More likely than not	About as likely as not	N/A	Unlikely	More likely than not	More likely than not
<b>Campaspe</b> Extra buybacks (full implementation)	More likely than not	About as likely as not	N/A	Unlikely	More likely than not	More likely than not
<b>Loddon</b> No new buybacks	About as likely as not	About as likely as not	More likely than not	More likely than not	About as likely as not	More likely than not
<b>Loddon</b> Extra buybacks (full implementation)	About as likely as not	About as likely as not	More likely than not	More likely than not	About as likely as not	More likely than not
<b>Wimmera Mallee</b> No new buybacks	About as likely as not	More likely than not	Unlikely	More likely than not	Unlikely	More likely than not
<b>Wimmera Mallee</b> Extra buybacks (full implementation)	About as likely as not	More likely than not	Unlikely	More likely than not	Unlikely	More likely than not
<b>Broken</b> No new buybacks	About as likely as not	About as likely as not	More likely than not	About as likely as not	More likely than not	More likely than not
<b>Broken</b> Extra buybacks (full implementation)	About as likely as not	About as likely as not	More likely than not	About as likely as not	More likely than not	More likely than not

**Table 2. MDBA assessment of New South Wales Southern Murray Basin Plan areas**

System	Flows & Connectivity	Ecosystem Function	Waterbirds	Native Fish	Native Vegetation	Other Species
<b>NSW Murray</b> No new buybacks	About as likely as not	About as likely as not	More likely than not	About as likely as not	More likely than not	More likely than not
<b>NSW Murray</b> Extra buybacks (full implementation)	About as likely as not	About as likely as not	More likely than not	About as likely as not	More likely than not	More likely than not
<b>Murrumbidgee</b> No new buybacks	About as likely as not	About as likely as not	More likely than not	Unlikely	About as likely as not	More likely than not
<b>Murrumbidgee</b> Extra buybacks (full implementation)	About as likely as not	More likely than not	Likely	Unlikely	About as likely as not	Likely
<b>Lower Darling</b> No new buybacks	Unlikely	Unlikely	More likely than not	About as likely as not	More likely than not	More likely than not
<b>Lower Darling</b> Extra buybacks (full implementation)	Unlikely	Unlikely	More likely than not	About as likely as not	More likely than not	More likely than not
<b>Lachlan</b> No new buybacks	More likely than not	About as likely as not	More likely than not	About as likely as not	More likely than not	About as likely as not
<b>Lachlan</b> Extra buybacks (full implementation)	More likely than not	About as likely as not	More likely than not	About as likely as not	More likely than not	About as likely as not

**Table 3. MDBA assessment of South Australian Southern Murray Basin Plan areas**

System	Flows & Connectivity	Ecosystem Function	Waterbirds	Native Fish	Native Vegetation	Other Species
<b>SA Murray</b> No new buyback	About as likely as not	About as likely as not	More likely than not	About as likely as not	More likely than not	More likely than not
<b>SA Murray</b> Extra buybacks (full implementation)	About as likely as not	About as likely as not	Likely	About as likely as not	Likely	Likely
<b>Coorong, Lower Lakes &amp; Murray Mouth</b> no new buybacks	About as likely as not	About as likely as not	About as likely as not	Likely	Likely	About as likely as not
<b>Coorong, Lower Lakes &amp; Murray Mouth:</b> Extra buybacks (full implementation)	More likely than not	About as likely as not	About as likely as not	Likely	Likely	About as likely as not

**Table 4. MDBA assessment of New South Wales Northern Basin Plan areas**

System	Flows & Connectivity	Ecosystem Function	Waterbirds	Native Fish	Native Vegetation	Other Species
<b>Barwon Darling</b> No new buybacks	More likely than not	About as likely as not	Unlikely	About as likely as not	More likely than not	N/A
<b>Barwon Darling</b> Extra buybacks (full implementation)	Likely	More likely than not	Unlikely	Likely	More likely than not	N/A
<b>Gwydir</b> No new buybacks	More likely than not	More likely than not	About as likely as not	More likely than not	More likely than not	More likely than not
<b>Gwydir</b> Extra buybacks (full implementation)	More likely than not	More likely than not	About as likely as not	More likely than not	More likely than not	More likely than not
<b>Intersecting Streams</b> No new buybacks	More likely than not	More likely than not	About as likely as not	About as likely as not	More likely than not	N/A
<b>Intersecting Streams</b> Extra buybacks (full implementation)	More likely than not	More likely than not	Likely	Likely	More likely than not	N/A
<b>Macquarie- Castlereagh</b> No new buybacks	Likely	Likely	Likely	More likely than not	More likely than not	Likely
<b>Macquarie- Castlereagh</b> Extra buybacks (full implementation)	Likely	Likely	Likely	More likely than not	More likely than not	Likely
<b>Namoi</b> No new buybacks	More likely than not	More likely than not	Unlikely	More likely than not	More likely than not	More likely than not
<b>Namoi</b> Extra buybacks (full implementation)	More likely than not	More likely than not	Unlikely	More likely than not	More likely than not	More likely than not
<b>Border River</b> No new buybacks	More likely than not	More likely than not	More likely than not	More likely than not	More likely than not	More likely than not
<b>Border Rivers</b> Extra buybacks (full implementation)	More likely than not	More likely than not	More likely than not	More likely than not	More likely than not	More likely than not

**Table 5. MDBA assessment of Queensland Northern Basin Plan areas**

System	Flows & Connectivity	Ecosystem Function	Waterbirds	Native Fish	Native Vegetation	Other Species
<b>Condamine Balonne</b> No new buybacks	More likely than not	More likely than not	Likely	More likely than not	More likely than not	N/A
<b>Condamine Balonne</b> Extra buybacks (full implementation)	More likely than not	More likely than not	Likely	More likely than not	Likely	N/A
<b>Border Rivers</b> No new buybacks	More likely than not	More likely than not	More likely than not	More likely than not	More likely than not	N/A
<b>Border Rivers</b> Extra buybacks (full implementation)	More likely than not	More likely than not	More likely than not	More likely than not	More likely than not	N/A

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