



# Submission to the Murray–Darling Basin Plan Review

## Background

The Murray–Darling Basin Authority (MDBA) is undertaking the first 10-year Statutory Review of the Basin Plan. Public consultation opened in early February, with submissions closing at close of business on **Friday, 1 May 2026**.

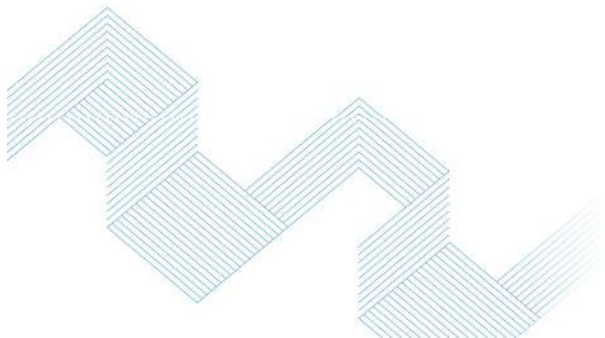
While peak bodies such as Cotton Australia, the National Irrigators Council (NIC), National Farmers' Federation (NFF), NSW Irrigators' Council (NSWIC), Queensland Farmers' Federation (QFF), and valley-based groups will be making submissions, Cotton Australia strongly encourages individual entitlement holders and community members to also lodge submissions to reinforce industry and community perspectives.

Full details on the Review can be found here ( including how and where to load submissions) - [https://www.mdba.gov.au/publications-and-data/publications/2026-basin-plan-review-discussion-paper?gclsrc=aw.ds&gad\\_source=1&gad\\_campaignid=23529144647&gclid=CjwKCAjw7vzOBhBxEiwAc7WNR8kKLB DvMsyEZA9iUU4m62Jlz0oB3gyqjov8uBTJK9BlkCvHbo-kgRoCGYgQAvD\\_BwE](https://www.mdba.gov.au/publications-and-data/publications/2026-basin-plan-review-discussion-paper?gclsrc=aw.ds&gad_source=1&gad_campaignid=23529144647&gclid=CjwKCAjw7vzOBhBxEiwAc7WNR8kKLB DvMsyEZA9iUU4m62Jlz0oB3gyqjov8uBTJK9BlkCvHbo-kgRoCGYgQAvD_BwE)

To assist in making a submissions Cotton Australia has prepared these key messages that you may wish to include in your submission:

## Key Messages for Inclusion in Submissions

- The Review appropriately acknowledges the significant environmental improvements achieved through implementation of the Basin Plan. However, it fails to adequately recognise the **substantial social and economic impacts** experienced by smaller, irrigation-dependent communities. These impacts should be explicitly acknowledged and addressed.
- The Review confirms that the **vast majority of Sustainable Diversion Limit (SDL) units are meeting environmental outcomes**, demonstrating that there is **no justification for any further reduction in SDLs**.
- Since formal SDL accounting commenced, **annual water extractions have consistently remained below SDL limits**, meaning irrigators have exceeded Basin Plan requirements in terms of compliance and restraint.
- For groundwater users in the **Lower Gwydir, Upper Namoi and Lower Namoi** groundwater units, any additional management measures should be developed **in close consultation with water users and the NSW Government**, rather than imposed through Basin Plan changes.



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- The Review indicates that further environmental gains through additional water recovery would be **marginal at best**. Investment should now shift away from water acquisition and toward **complementary measures** such as riparian restoration, reducing cold-water pollution, improving fish passage, and removing invasive species.
- **Control and eradication of European Carp** must be a central focus of the Basin Plan. Without addressing carp impacts, long-term and meaningful river health improvements will not be achieved.
- As the **largest water holder in the Basin**, the Commonwealth Environmental Water Holder (CEWH) must lead improvements in the **efficiency and effectiveness of environmental water delivery** to maximise environmental outcomes from existing holdings.
- To support this, the CEWH should be given **greater flexibility to trade environmental water** and reinvest proceeds into environmental delivery infrastructure and other complementary measures where appropriate.
- Irrigators in the **NSW Northern Basin** should reject any suggestion that additional water recovery or investigations are required to meet enhanced connectivity objectives through the Barwon–Darling. The **2016 MDBA Northern Basin Review**, the most comprehensive assessment undertaken, found that **less water—not more—was required** to meet environmental outcomes.
- The **MDBA cannot rely on any of the NSW Northern Connectivity Review modelling** as it is deeply flawed, not the least because it **has not considered the positive impact of the CEWH’s water**, the actual flows into the Northern Basin from Queensland, and the reduction in take resulting from the volumetric licencing of Floodplain Harvesting.
- Irrigators strongly oppose the use of **Rules-Based Changes** as a water recovery mechanism unless it can be conclusively demonstrated—and agreed by water users—that such changes would have **no net impact** on water availability, reliability, or entitlements.
- Governments must remain committed to delivering the full **605 GL of SDL Adjustment Mechanism (SDLAM) projects**, even if this requires extended timeframes and a revised assessment framework that prioritises **environmental outcomes over avoided water use**.
- If SDLAM project shortfalls occur, any required funding should be redirected toward **complementary measures**, rather than water entitlement acquisition.
- In relation to the **450 GL “Upwater” target**, further water acquisition should cease, and any committed but unspent funds should be invested in complementary measures.
- As part of a renewed Basin Plan, the **Federal Government should commit to a significant, long-term investment program in infrastructure renewal and complementary environmental measures**.

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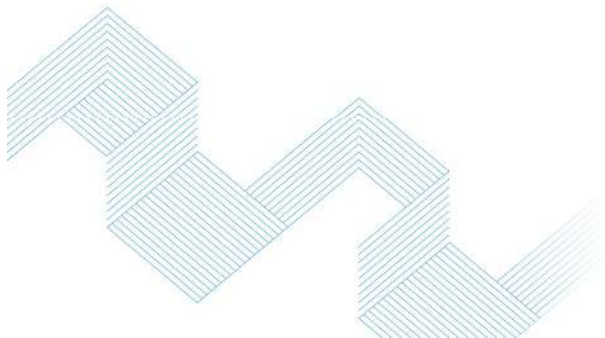
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