

An inquiry into the implementation of the Northern Basin Toolkit

To the Inspector General Water Compliance 29 November 2024

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# **Background**

The National Irrigators' Council (NIC) is the peak industry body for irrigated agriculture in Australia. NIC is the voice of irrigated agriculture and the industries producing food and fibre for domestic consumption and significant international trade. Put simply, our industry is helping to feed and clothe Australia and our trading partners.

Irrigated agriculture in Australia employs world leading practices in water management. Industry has extensively adopted and embraced new technologies and knowledge to ensure we are consistently growing more with less water. Australian farmers also operate under strict regulations and compliance mechanisms. These factors mean we lead the world in both farming practices and produce quality.

NIC's policy and advocacy are dedicated to growing and sustaining a viable and productive irrigated agriculture sector in Australia. We are committed to the triple bottom line outcomes of water use - for local communities, the environment, and for our economy.

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# Introduction

Thank you for the opportunity to provide input into this current inquiry into the implementation of the Northern Basin Toolkit, ('the Toolkit') set out in Schedule 3 of the Intergovernmental Agreement on Implementing Water Reform in the Murray Darling Basin, June 2013 (as amended in August 2019)<sup>1</sup> (the Agreement).

As background, the Toolkit is a set of measures intended to target improved water management and environmental outcomes across the northern Murray Darling Basin.<sup>2</sup> The original commitment in the Agreement was to implement all measures by 30 June 2024 which were extended as part of the Restoring our Rivers (RoR) Act 2023 and are now due for completion by 31 December 2026.

The Toolkit was a multi-pronged solution developed through the Northern Basin Review to:

- recommit government to existing requirements (Bridging the Gap requirements);
- enable investments over-and-above the Murray Darling Basin Plan (the' Basin Plan') assumptions and existing levers of just adding water;
- enhance environmental outcomes; and
- minimise socio-economic impacts in disadvantaged communities within Northern Basin.

The overarching objective was to maintain and enhance environmental outcomes without the need to purchase any more water above any of the remaining local requirements. It was acknowledged that the socio-economic impacts of further water recovery were not commensurate to the likely environmental benefits to be achieved with just more water. As a result, the Toolkit essentially became an initial foray into strategic Government investment into complementary measures within the Northern Basin.

Once completed, the Toolkit projects will provide critical data to inform the value and benefit of the complementary measures pursued in the Toolkit. This information should be of note to all future governments about the opportunities from investing in ways to enhance and optimise the environmental water which already exists, as well as to add value to the Australian taxpayer (compared with just adding water).

While this Toolkit occurred in the context of amending the proposed water recovery target in the northern Basin from 390 gigalitres (GL) to 320 GL³, it must be recognised that complementary measures are more than just an 'offset' for water recovery, but an integral part of environmental management. These measures achieve environmental outcomes that simply 'adding more water' cannot do. They are a distinct and necessary lever, alongside water sharing arrangements.

<sup>&</sup>lt;sup>1</sup> The Intergovernmental Agreement on Implementing Water Reform in the Murray Darling Basin, June 2013 (as amended in August 2019) is an agreement for the purposes of section 215C(1)(c), see section 215C(3)(b) of the Water Act.

<sup>&</sup>lt;sup>2</sup> Explanatory Statement to the Basin Plan Amendment Instrument (No. 1) 2018 at page 2.

<sup>&</sup>lt;sup>3</sup> It was recognised since the inception of the Plan in 2012 that there was insufficient information about the Northern Basin.

NIC and communities strongly support these approaches, and consider their lack of implementation (and further additions) as the largest shortcoming from the Basin Plan to date (and largest opportunity moving forward). It is important to note that the criticisms raised in this submission relate to the Government's implementation of the Toolkit, and not the concept of the Toolkit itself (which is strongly supported, as above).

Ironically - despite the MDBA saying that community support would be needed to make sure the outcomes [of the toolkit] are achieved<sup>4</sup> - of the six measures, only the Gwydir Constraints and targeted environmental works and measures to promote fish movement and habitat in the northern Murray-Darling Basin had significant community involvement (this is primarily due to the direct access and/or impact/opportunity, that these projects had on individual landholders). Interestingly, a recent report by T.S Rayner et al on modern fish screen programs indicated that "NSW water users have responded enthusiastically to the opportunity to participate in incentive programs"<sup>5</sup>.

All the measures were directly recommended from the Northern Basin Review, were government designed and led with inter-agency working groups and limited non-government oversight. Any failures to implement these on time, within scope and on-budget is therefore, the sole responsibility of the Australian Government and the respective jurisdictions of New South Wales and Queensland - not the communities or industry in these regions. This is also agreed by the Productivity Commission, who found that "Delays implementing the northern Basin toolkit measures are a result of inadequate accountability for delivery, as well as a lack of oversight and review of the measures."

This is particularly important as it is the environment, industry and communities which are at risk if Government's fail to achieve the outcomes. This can be said for all elements of the Murray Darling Basin Plan where there is limited accountability and consequence for governments if they fail, with all the burden solely landing with the environment, industry and communities.

Our submission focuses on how the various Governments communicated and engaged with industry, and the likely benefits of the industry involved measures.

We note that this inquiry was made under section 239AB of the Water Act regarding the Inspector General of Water Compliance's legislated responsibilities to monitor and provide independent oversight of the performance of functions of the agencies, Basin States and their obligations in relation to the Basin Plan and the management of Basin water resources and any agreements.

Whilst we welcome this oversight for the Northern Basin Toolkit, we also encourage the office of the IGWC to consider similar inquiries into the other elements of the Murray Darling Basin Plan, where there is high levels of uncertainty and risk for Basin communities from failure of various Governments to implement Government-led programs, such as:

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<sup>&</sup>lt;sup>4</sup> Page 2, The Northern Basin Review, Murray Darling Basin Authority, 2016 <a href="https://www.mdba.gov.au/sites/default/files/publications/Northern-basin-review.pdf">www.mdba.gov.au/sites/default/files/publications/Northern-basin-review.pdf</a>

<sup>&</sup>lt;sup>5</sup> Realising the benefits of modern fish screen protection, 2024 T.S. Rayner et al – CSIRO Publishing via <a href="https://www.publish.csiro.au/MF/pdf/MF24067">https://www.publish.csiro.au/MF/pdf/MF24067</a>.

<sup>6</sup> https://www.pc.gov.au/inquiries/completed/basin-plan/report

- Sustainable Diversion Limit Adjustment Mechanism progress, where a shortfall of nearly 300 gigalitres is reported.
- Framework for delivering the additional 450 gigalitres of environmental water, where an 'all options' approach was committed to, yet progress on water purchases appears to be prioritized, with no consideration of other options, and without implementation of agreed regional development funding.

# **Terms of Reference**

The terms of reference for this inquiry are to inquire into and to make findings and recommendations in relation to:

- a) the:
  - i. extent to which the Northern Basin Toolkit has been implemented
  - ii. progress that has been achieved in relation to the Measures (including the work done by any corporation and/or other business pursuant to arrangements entered into for the purpose of implementing the Northern Basin Toolkit)
  - iii. extent to which outcomes sought have been attained
  - iv. work left to do to implement the Northern Basin Toolkit.
- b) the extent to which the Commonwealth, New South Wales and Queensland governments have implemented their respective commitments in Schedule 3 of the Agreement
- c) the extent to which the governance arrangements referred to in clauses 9 to 12 of Schedule 3 of the Agreement have been effective, both in relation to design and implementation of those governance arrangements
- d) reasons for the non-delivery of all the Measures by June 2024 and the reasons for the request for an extension of time to deliver the Measures until 31 December 2026
- e) the amount that has been spent respectively by the Commonwealth, Queensland and New South Wales governments in relation to implementation of the Northern Basin Toolkit and the particular items and associated deliverables on which that money has been spent
- f) the effectiveness of the Agreement to deliver the Northern Basin Toolkit.

# **Specific Comments**

# Transparency and accountability

A recurring criticism of government-led elements of the Basin Plan is the limited transparency on the design, implementation and oversight, with no consequences or form of recompense, for poor outcomes. It is often unclear who approves or rejects projects, why this occurs, how long it takes and how progress is reported. The Toolkit is no different.

For example, the Northern Basin Review in November 2016 clearly outlined the Toolkit projects in Appendix B. However:

- Schedule 3 of the Agreement was not amended until August 2019
- the first of the 'projects' were not approved until March 2021; and
- more agreed in November 2022.

There is no detail or reasoning on how or why it took Governments five-years to develop and approve the first of the Toolkit projects. It's noted that policy projects appear to be progressed immediately upon signing in 2019 as they did not require businesses cases.

The Toolkit program does not have a clear process for reporting, which means that there is also no systematic process for public accountability. Whilst work is presumably being undertaken, it is not often visible outside of the agencies or the working groups and not regularly reported. Annual progress reports were found on the MDBA website starting in August 2022 and August 2023 but there is no update for August 2024. The lack of reporting process limits external oversight and interrogation of the reasons why the program was behind schedule and opportunities for feedback.

Of the information available, it is often sporadic and via multiple sources and it's not easy to determine what is accurate or not. A search for the Northern Basin Toolkit revealed the following webpages, with slightly different status and updates:

- MDBA provides an overview of projects, responsibilities and engagements.
- MDBA a separate page that outlines in more detail the 10 projects (despite DCCEEW having 11 apparently funded), considerably outdated with 11 project funded and status does include updated timeframes.
- <u>MDBA</u> progress reporting page providing two updates, August 2023 and August 2022. Not updated for August 2024.
- <u>DCCEEW Federal</u> outlines the projects, includes the business cases of the unapproved projects but not the approved projects, provides an overview, but no status.
- <u>DPIE Water NSW</u> outlines the NSW program, doesn't include links on policy information only works and measures, links to these provide up to date status.
- <u>Fish Screens Australia</u> overview of fish friendly projects in NSW and QLD with links back to both NSW DPI Fisheries and Southern Queensland Landscapes

Future programs must consider increased transparency and governance, to improve accountability. This can be achieved though several ways including:

- Public project management plans
- Quarterly reporting rather than annual
- A single location for project information and deliverables
- Stakeholder reference groups or oversight
- Partnership arrangements that account for co-design and joint implementation
- Incentives for early project completion.

## **Progress**

As the Toolkit was a government-led program, we have limited accessibility of data to inform progress, and it is best answered by the jurisdictions in charge.

Our discussions and review of the publicly available information revealed that the majority of measures are complete or near complete. As raised above, this was found on multiple sites and often inconsistently reported.

Progress is reported to include:

- The Australian Government has recently closed another tender round for remaining Bridging the Gap recovery (local water recovery required is 21.1 GL/y, in the northern Basin), this was the third attempt to purchase the remaining gap in some of these areas.
- There are policy steps still to be explored and implemented by NSW regarding accounting for unregulated flows in the interconnecting streams, however, all other policy areas are understood to be completed. These include:
  - o Protection of environmental flows
  - o Accounting for water across the QLD:NSW Border
  - o Event based water management options.
- The Gwydir Constraints project remains behind schedule and has an uncertain future, pending landholder negotiations (as with Southern Basin Constraints Project). The MDBA is undertaking a Constraints Roadmap due next month, which should also include recommendations on the Gwydir Constraints Project.
- The NSW and QLD fish friendly programs are on track for the new deadline after having been impacted by administration delays, high river flows and on-site complications.
- Works and measures for the Macquarie enhanced water project are finalized.

No information on project 11, Pindari Dam Cold Water pollution could be found.

# Challenges

It must be acknowledged that implementation of the Toolkit occurred during a challenging time within the Northern Basin and, indeed, the world. The program started with several severe drought years in the Northern Basin, then Covid-19 and the economic effects, then flooding and high river levels.

These all impacted the ability for governments to engage with community, consult appropriately, supply equipment and access to sites where works and measures were being undertaken. Its likely increased costs for works and measure programs such as steel for the fish screens. This was also a time of heightened distress amongst communities, driven by factors such as: severe drought impacting farm businesses, major water reforms at both State and Federal levels severely impacting the industry, and the growing volume of misinformation regarding water use and water availability around the Basin, but particularly the Northern Basin which took a heavy toll on mental health.

For some landholders and water users, they were overwhelmed as they were disproportionately involved, when the policy and projects were directly targeted to them. For example, landholders and water users in the Lower Gwydir and Gingham have had a lengthy constraints engagement, as well as active management consultation and considerations during the Toolkit operations which often overlapped with other policy programs.

In the Barwon Darling, a range of policy reforms directly targeted those communities and water users has fatigued many whilst also significantly altering their regulatory regime. The

differentiation of whether this is Toolkit, Basin Plan or other reforms, is not relevant to the participants and they are overwhelmed at the pace of change.

In discussion with the fish screening team, high river levels throughout the installation period were problematic which has delayed installations in some locations. As each site is custom designed and built, it much be acknowledged that these types of infrastructure projects will take time and timeframes must allow for proper contingencies for these issues.

Future programs must establish realistic timeframes for implementation including contingencies for drought and floods and allow appropriate time for community engagement and co-design elements.

Future programs must also consider how these complementary measure projects can contribute or be accounted toward Murray Darling Basin Plan outcomes. For example, event-based arrangements in unregulated catchments, where the Commonwealth may lease water from landholders or temporary purchase, does not contribute to the achievement of Sustainable Diversion Limits in those regions. These projects definitely align with the objectives of the Murray Darling Basin Plan but not the current targets, which are only volumetric in nature.

#### **Outcomes**

As some projects are not yet fully completed, the full understanding of outcomes from the Toolkit cannot be known. Whilst some of the policy reforms and projects are challenging in nature to implement - the success of the Toolkit in terms of finding solutions to enhance environmental outcomes that otherwise were not possible through Murray Darling Basin Plan implementation previously should be celebrated, nonetheless.

To highlight these, we have investigated a few key outcomes that have been observed and should be investigated.

#### Additional water protected through the Northern Basin

Following the completion of policy changes to protect water through the Northern Basin (from within Queensland across the border into New South Wales and along the Barwon-Darling to Menindee), more water than assumed under the Murray Darling Basin Plan has been delivered to the Barwon-Darling and available at Menindee Lakes since active management was implemented in December 2020<sup>7</sup>. Without these protections, environmental water from upstream catchments was at risk of extraction if license conditions had been achieved.

The use of held environmental water for connectivity provisions from upstream catchments into the Barwon-Darling by the CEWO subsequently increased following active management. A review of the NSW Water Insights portal, CEWO historical water use and QLD water reports indicated the following volumes were protected, as presented below in Table 1.

<sup>&</sup>lt;sup>7</sup> <a href="https://water.dpie.nsw.gov.au/our-work/projects-and-programs/environmental-water-management-in-nsw/what-we-are-working-on-now/river-connectivity-archive/northern-to-southern-basin-environmental-flow-protection-trial">https://water.dpie.nsw.gov.au/our-work/projects-and-programs/environmental-water-management-in-nsw/what-we-are-working-on-now/river-connectivity-archive/northern-to-southern-basin-environmental-flow-protection-trial</a>

Table 1: Summary of CEWO HEW protected in the Northern Basin since 2021

Year	Volume Protected Barwon Darling (GL)	NSW Tributaries (GL)	QLD Tributaries (GL)
2021	68GL	31GL	
2022	45GL	13.6GL	245 (GL)
2023	16GL	10.8GL	104 (GL)
2024	64GL	31 GL*	89GL
TOTAL	193GL	86.4GL	438GL

<sup>\*</sup> this figure was calculated from known events delivered into the Barwon Darling via MDBA presentation and insights (and is therefore likely an underestimation).

Table 1 highlights that the volumes of water protected has increased, from zero in 2020 to over a 180GL in 2024 (across the Northern Basin) and varies according to licence conditions. Over time period, this has resulted in more than 717GL protected, which is 10 times more water than the reduction to water recovery in the Northern Basin because of the Northern Review and the Toolkit measures.

In 2024, a trial of shepherding this additional water received into Menindee Lakes through the Lakes was undertaken with support of Basin States and the Australian Government. The decision to operate the trial recognises the value of the additional water being delivered to Menindee Lakes that this active management along upstream catchments delivers, which was made possible through the Toolkit investment.

We note that the NSW Government has prepared a report on the trial<sup>8</sup> and that the MDBA is currently reviewing this work. NIC reserves the right for further comment and consideration of this trial, following review of this information.

We encourage the Inspector General to provide the much-needed independent oversight on this trial to ensure that there are no impacts on reliability to water users and to ensure transparency and accountability of the process for all users across the states. Of particular interest, NIC is interested in understanding and validating the calculation and assessment of the volume of water available for shepherding and the determination and suitability of loss factors being applied to shepherded water to ensure there are no third-party impacts from this new policy option. NIC is also interested in understanding how shepherding environmental water through Menindee as a new measure, can be calculated as a Sustainable Diversion Limit Adjustment Mechanism offset.

#### Native fish protected

The implementation of fish friendly extraction in New South Wales and Queensland is one of the great success stories of the Toolkit. The programs were over-subscribed by landholders as mentioned by Rayner et al<sup>5</sup> which meant the agencies could strategically target sites that were fit for purpose and provide the greatest environmental outcome for the investment. Upon completion of this program, it is anticipated that the expected environmental outcomes will be larger than reported to-date, and much needed economic data will also be available.

<sup>8 &</sup>lt;a href="https://water.dpie.nsw.gov.au/\_\_data/assets/pdf\_file/0011/619589/monitoring-flow-and-water-quality-in-the-lower-darling-river.pdf">https://water.dpie.nsw.gov.au/\_\_data/assets/pdf\_file/0011/619589/monitoring-flow-and-water-quality-in-the-lower-darling-river.pdf</a>

A summary of outcomes indicates from the <u>Australian Fish Screens</u> website indicates:

- NSW invested \$20M to provide screens on 28 pumps, from Moree to Wilcannia which is estimated to protect ~791,000 native fish per annum.
- QLD invested \$6.6M on 5 Screens with 3 more manufactured, to protect ~231,000 native fish per annum.

This means that for less than \$30M nearly 1 million native fish can be protected from extraction annually, providing more opportunity for native fish to populate our rivers. This presents significant value for money – for comparison, the equivalent investment in water would result in approximately 2.4GL9 of NSW Border Rivers (Geneal Security A) entitlement (noting that this in not the long-term equivalence or actual water, these numbers would be even less) or 3GL10 of Lower Namoi General Security entitlement (again the number would be less) that doesn't guarantee to protect native fish, and also has low reliability (i.e. low or no availability in dry years).

Many lessons learnt on how to design and implement fish screens on larger and existing sites were collected from this investment which will be critical to review and consider for any future programs.

## Innovative ways to deliver water to environmental assets

Event based mechanisms have been explored by the CEWH to add value to natural flows and supplement existing environmental allocation or deliveries to provide innovative ways to achieve better environmental outcomes. In September 2023, these approaches were independently reviewed by Greg Claydon for the CEWO<sup>11</sup> which provided an overview of the program and outcomes.

In summary, it was outlined that event-based mechanisms can be:

- temporary purchase of water harvesting allocations;
- purchase and release of water from private storage;
- no pump arrangements; and or
- more sophisticated arrangements like permanent at-call options.

These approaches by the CEWO in Queensland provided new opportunities for water delivery to help rebuild waterbird colonies, resulting in the opportunity to extend breeding in 2023, creating a second opportunity in less than 10-years for waterbird breeding at the site. Natural flows were not available in 2023 to provide the water to extend the breeding event. The type and location of event-based mechanisms are summarized in Table 2.

<sup>&</sup>lt;sup>9</sup> Most recent trade data indicated \$12,500/ML of NSW Border Rivers General Security A entitlement.

<sup>&</sup>lt;sup>10</sup> Most recent trade date indicated the highest trade of \$9,913/ML of Lower Namoi General Security entitlement.

<sup>&</sup>lt;sup>11</sup> https://www.dcceew.gov.au/sites/default/files/documents/independent-review-narran-lakes-release-event-based-mechanism-2023.pdf

Table 2: Summary of Event Based Mechanisms and outcomes

Year	Location and type	Volume	Outcome
2020	Lower Balonne River – no pumping	9GL	Improved waterbird habitat.
2023	Narran River – release from on-farm storage	6.5GL	Extended waterbird breeding event

Event based mechanisms provide a very clear opportunity for enhanced environmental benefits to be realized, particularly in unregulated catchments.

However, one challenge is they can be challenge for Government's to negotiate under their procurement guidelines and, policy constraints mean they do not directly contribute to the achievement of Sustainable Diversion Limits. Processes to overcome these challenges should be considered for future governance and program designs. The use of longer-term leasing arrangements should be explored with options, to op in or out, based on a decision point and set of conditions which is agreed by both parties. Similar commercial arrangements already exist between other water users.

# **Key Considerations for future programs**

### Governance

It is evident that improved governance arrangements for any future program, similar to the Toolkit, should be established. These arrangements should provide clearer transparency and accountability of project deliverables, timeframes, community awareness and empower community support. As per our earlier comments, suggestions for improvement could be:

- Public project management plans
- Quarterly reporting rather than annual
- A single location for project information and deliverables
- Stakeholder reference groups or oversight
- Incentives for early project completion.

# **Partnerships**

As all the programs were government-led and determined for communities, rather than by them, it is recommended that broader community support should be enabled early (i.e. design phase). To broaden community support, some projects could have been implemented in partnership with non-government organisations which would have increased the local engagement and support. This may have helped to overcome barriers to implementation and provided the opportunity to implement the fish friendly programs as a grant scheme.

# **Optimising environmental water**

A large focus of water reform over the previous two decades, and particularly the Basin Plan has been 'rebalancing', through water recovery. The Toolkit provided the first strategic investment by government in other tools, to optimize and enhance environmental outcomes from the water already in the Northern Basin. With significant volumes of water now available throughout the Basin, both naturally (i.e. Planned Environmental Water) and directly as Held Environmental Water, the next era of water management must seek to instead focus on the optimization of that water within the established water shares. This may take the form of:

- Identifying management strategies for the use of environmental water, to optimize
  outcomes (such as timing of releases, coordination of releases, and joint-release
  strategies);
- Complementary measures to sit alongside environmental watering;
- Integrated catchment management through land and water partnerships.

#### Scientists have highlighted that:

"While recovering water will provide good outcomes, as a sole intervention, it is not enough to deliver the desired environmental benefits...... recovering water is not enough to deliver all the anticipated environmental benefits. In a highly modified system, equal attention should be given to addressing other threats that water delivery alone cannot ameliorate." 12

These authors identify 10 examples of complementary measures, such as:

- Integrated aquatic pest control (such as carp control);
- Addressing cold water pollution;
- Enhancing fish passage;
- Habitat restoration;
- Re-establishing threatened species;
- Integrating complementary measures into Basin-scale flow delivery strategies

While of value to every river system, this should be a primary focus for developed river systems that have undergone transitions to achieve sustainable diversion limits, such as the Murray-Darling Basin. For example:

"The Murray-Darling Basin Plan and earlier reforms have reduced diversions to an annual average 28% of inflows, within acceptable impacts in global frameworks for the ecological limits of hydrologic alteration. However, non-water components, known as complementary measures, have received little attention, despite being considered equally important to deliver all anticipated environmental benefits." 13

This has also been emphasized by the MDBA in their 'Early Insights Paper' as part of the Basin Plan Review, with a section on "Moving beyond 'just add water'". The Paper says:

<sup>&</sup>lt;sup>12</sup> Lee J. Baumgartner, P Gell, J D Thiem, C Finlayson, N Ning (2019) "Ten complementary measures to assist with environmental watering programs in the Murray–Darling river system, Australia": <a href="https://onlinelibrary.wiley.com/doi/abs/10.1002/rra.3438">https://onlinelibrary.wiley.com/doi/abs/10.1002/rra.3438</a>

<sup>&</sup>lt;sup>13</sup> <u>Take it as a compliment: integrating complementary measures as the next chapter of Murray–Darling Basin water management: Water International: Vol 49, No 3-4 - Get Access (tandfonline.com)</u>

"Providing water for the environment has been essential to achieving Basin management outcomes, but 'just adding water' is not sufficient. Achieving Basin Plan environmental outcomes depends not only on the quantity of water for the environment, but on other legislation, rules and practices. These inform how:

- river operators run the river
- environmental water holders manage their portfolio
- land managers maintain and improve riparian areas". 14

Part of taking this more holistic and integrated approach is the importance of working together with landholders, water users and communities through collaborative partnerships. For example:

"A contemporary paradigm of best-practice based on participation and co-benefit outcomes not only offers significant further opportunity for environmental outcomes, but also to work with communities to begin rebuilding trust, ownership and acceptability of water management in the Basin." 15

## Conclusion

Thank you for the opportunity to provide input into this Inquiry into the Northern Basin Toolkit.

The Toolkit is a multi-pronged solution which has delivered strong environmental outcomes, despite some projects not yet being completed.

Once completed, the Toolkit projects, will provide critical data to inform the value and benefit of the complementary measures pursued in the Toolkit. This information should be of note to all future governments about the opportunity that investing in ways to enhance and optimise the environmental water that already exists, and the value this will bring the Australian taxpayer compared with just adding more water.

We submit that there were significant governance and engagement gaps with the design and implementation of the Toolkit, and recommend improvements to any future programs. Nonetheless, this does not diminish the value of the Toolkit (and similar programs) as an important lever to achieve environmental outcomes, alongside other components of the Plan, that water alone cannot achieve.

We welcome similar inquiries by the Inspector General of Water Compliance into other areas of implementation of the Basin Plan, as well as independent oversight into the current shepherding trial at Menindee and how this can be included as a Sustainable Diversion Limit Adjustment Mechanism project.

#### Ends.

<sup>&</sup>lt;sup>14</sup> Early Insights Paper publication – Basin Plan Review | Murray–Darling Basin Authority (mdba.gov.au)

<sup>&</sup>lt;sup>15</sup> Contemporising best practice water management: lessons from the Murray-Darling Basin on participatory water management in a mosaiced landscape: Australasian Journal of Water Resources: Vol 27, No 2 - Get Access (tandfonline.com)