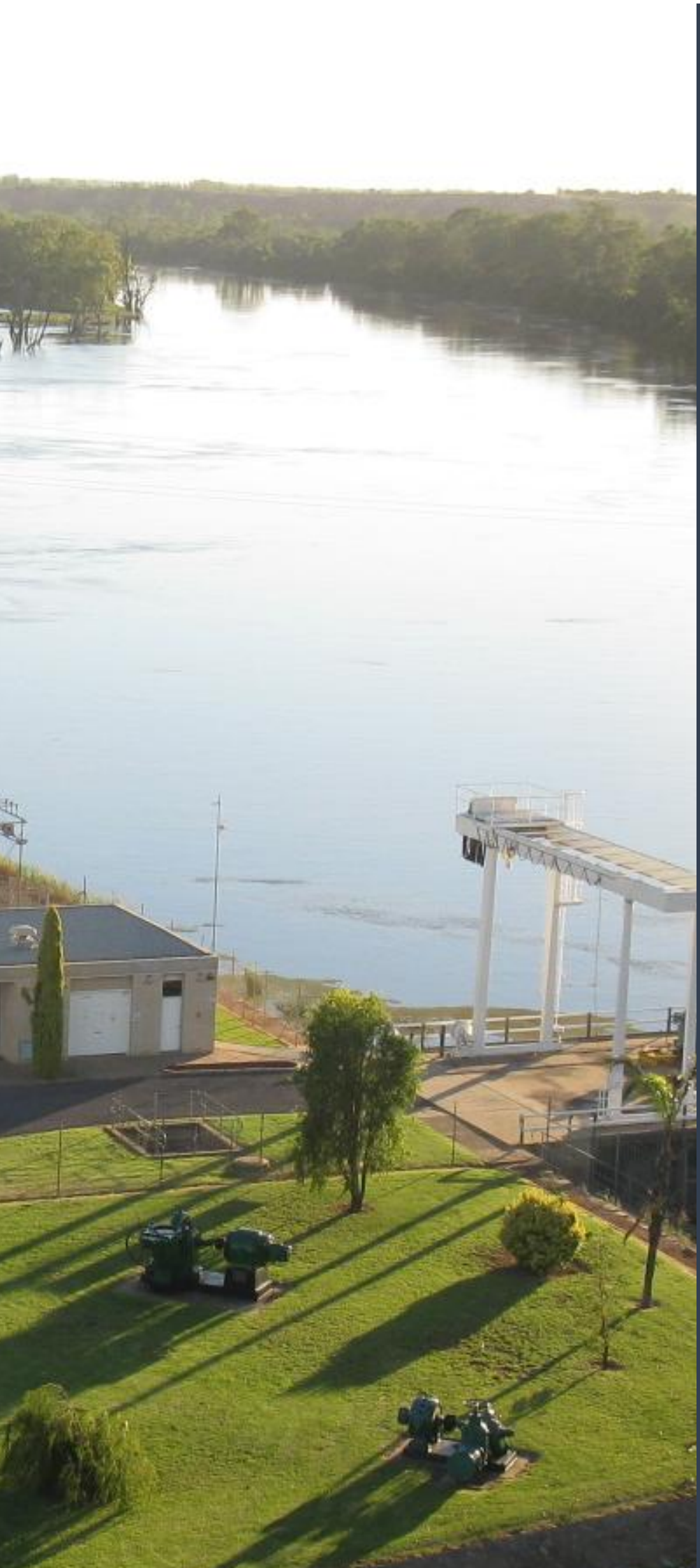

RENMARK
IRRIGATION TRUST

MURRAY-DARLING BASIN PLAN REVIEW – DISCUSSION PAPER SUBMISSION

RENMARK IRRIGATION TRUST
Constituted by a Statute of the Parliament of South Australia 1893

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Introduction

Renmark Irrigation Trust (RIT) welcomes the opportunity to provide a submission to the Murray–Darling Basin Authority (MDBA) in response to the 2026 Murray–Darling Basin Plan Review Discussion Paper (Discussion Paper).

RIT is an irrigation infrastructure operator and community institution based in Renmark, South Australia. Established in 1893, RIT has played a foundational role in supporting Renmark as Australia's first irrigation settlement. Today, RIT delivers irrigation water to approximately 600 irrigator Members across 4,900 hectares of permanent horticultural plantings in Renmark, and also undertakes environmental watering activities in partnership with a number of organisations, including the Commonwealth Environmental Water Holder (CEWH), Renmark Paringa Council (RPC), and other local environmental action groups and schools. In addition, RIT supplies water for critical human needs to domestic households and industrial users, extending our service footprint to a broader customer base of approximately 1,500. Our role extends beyond water delivery. We are stewards of critical regional infrastructure that underpins the economic, social and environmental wellbeing of our community.

Water security is fundamental to our region. The Riverland is characterised by permanent plantings including wine grapes, citrus and almonds. These crops require reliable annual water supply. Unlike annual cropping systems, permanent horticulture cannot be fallowed in response to dry conditions without long-term economic loss or risk to future plant viability. As such, reliability, market access, delivery certainty and price stability are not abstract policy considerations. They are central to our region's viability.

Indeed, policy uncertainty can be almost as damaging as water recovery itself. Irrigators will invest if their property rights are secure and predictable. Succession decisions depend on that confidence. If the next generation sees water availability as uncertain, gradually eroding or subject to repeated policy intervention, it becomes very difficult to commit to agriculture. Where policy settings create sustained uncertainty around future water reliability and affordability, investment, succession planning and long-term confidence are weakened. Stability underpins investment and planning.

We support the objective of a healthy working Murray–Darling Basin. We recognise the importance of environmental watering, water quality improvement and ecosystem resilience. RIT's participation in environmental watering programs and commitment to local environmental action demonstrate that support, and we acknowledge the shared responsibility to protect Basin health.

With respect, the Discussion Paper does not give sufficient weight to irrigation water security and the viability of irrigation communities. In the Riverland context, that omission is material. While irrigated agriculture is referenced, it is not given the same practical weight as environmental water planning, constraints management, or regulatory reform. Healthy rivers require healthy communities to care for them, and enjoy them.

This submission outlines areas of support, areas of concern, and recommendations to ensure that the next phase of Basin Plan implementation maintains a genuine balance between

environmental objectives and the long-term sustainability of irrigation-dependent communities such as Renmark and the Riverland more broadly.

Summary of RIT's position

RIT supports a healthy working Murray–Darling Basin and recognises the importance of efficient environmental water management. RIT's principal submission is that irrigation water security must not be treated as a residual matter to be managed after environmental and regulatory decisions are made. It should be an explicit Review outcome, with measurable tests for reliability, affordability, delivery capacity, water quality and irrigation infrastructure operator viability.

RIT recommends that the Review adopt the following practical principles:

- no additional water recovery or reduction in the consumptive pool should be recommended unless the MDBA has first published evidence that the relevant environmental outcome cannot reasonably be achieved through the use of water already recovered, river operations, constraints relaxation, environmental works and measures, fish passage, habitat restoration, pest management or water quality interventions;
- all proposed reforms should be tested against district-scale impacts on allocation reliability, water market prices, delivery capacity, fixed-cost recovery and permanent horticulture viability;
- irrigation infrastructure operators should be recognised as essential delivery partners for productive use, environmental watering, water quality management, drainage and salinity management, and critical human water needs;
- property rights, timely trade approvals and market confidence should be protected for all entitlement holders, including where environmental water is involved; and
- adaptation costs associated with higher flows, changed river operations or new regulatory requirements should not be shifted onto irrigators or local infrastructure operators without transparent assessment and fair compensation.

The Role of Irrigation Communities in the Basin

The Basin Plan was established to balance environmental outcomes with productive use and to share available water between consumptive users and the environment.[1] Irrigation communities are not peripheral stakeholders. They are foundational to the "working Basin" concept.

The Riverland region demonstrates the integrated nature of water, infrastructure and community. Permanent plantings require high reliability allocations. Irrigation infrastructure involves significant fixed costs. Delivery losses, metering, compliance and asset maintenance must be managed irrespective of seasonal variability. Local employment and service industries depend on irrigated production, with approximately 24% of employment in the Renmark Paringa LGA being in the agricultural industry.[2]

[1] *Roadmap to the 2026 Basin Plan Review*: https://www.mdba.gov.au/publications-and-data/publications/roadmap-2026-basin-plan-review-0

[2] *Renmark Paringa Council Growth Strategy*, p 15: https://www.renmarkparinga.sa.gov.au/__data/assets/pdf_file/0028/1833535/Renmark-Paringa-Council-Growth-Strategy.pdf

Water recovery and structural adjustment over the past decade have required irrigation infrastructure operators to adapt business models and absorb financial pressure. In smaller districts, reductions in delivery volumes increase per-unit costs for remaining irrigators, creating compounding economic effects. This reality is referenced in the Discussion Paper. The Discussion Paper recognises that IIOs have had to adapt their service models and cost structures as water recovery has reduced irrigation entitlements. For RIT, this has diverted resources that could otherwise have been directed to renewal, upgrades and future-proofing of Trust infrastructure.

The Review must explicitly consider irrigation operator viability and community resilience as key policy considerations. Without viable irrigation networks, environmental watering delivery is also affected, and regional economic decline undermines social sustainability.

We respectfully submit that irrigation water security and community resilience should be addressed as a discrete and measurable outcome in the Review.

In practical terms, this means the Review should report not only on environmental outcomes, but also on whether Basin Plan implementation is maintaining the productive base, delivery networks and community confidence required for a genuinely "healthy working Basin". For RIT, the relevant measures include allocation reliability for permanent horticulture, exposure to allocation market volatility, delivery service costs, infrastructure renewal capacity, water quality, and the ability to keep participating in environmental watering projects.

Climate Change and Southern Basin Reliability

The Discussion Paper recognises that climate change is likely to reduce rainfall and runoff, particularly in the southern Basin, and increase pressure on irrigated agriculture.

For permanent horticulture in South Australia, declining inflows translate into increased allocation volatility, greater reliance on allocation markets, higher and more variable water prices, and elevated financial risk for growers. Irrigators in the Renmark irrigation district have historically adapted to reduced water volumes through efficiency systems and cannot continue to absorb the impacts of recovery without clear justification based on supported evidence of beneficial Basin outcomes along with fair compensation.

Climate projections must not become an implicit justification for additional reductions in the consumptive pool without clear evidence that other measures have been fully utilised.

Before contemplating any adjustment to Sustainable Diversion Limits or recovery volumes, the Review should distinguish clearly between outcomes constrained by water volume and outcomes constrained by operational, structural or non-flow factors. It should prioritise complementary measures such as constraints relaxation where socially acceptable and properly compensated, environmental works and measures, fish passage and habitat restoration, and improved river operations. It should also model and publish irrigation reliability impacts under multiple climate and policy scenarios.

Water security for irrigation communities must be addressed explicitly within climate adaptation planning, rather than assumed it will adjust through market mechanisms alone.

Irrigation Infrastructure

If higher flows remain an objective, associated infrastructure adaptation and investment should also be addressed in a practical and timely way. This includes measures such as fish screens, pump upgrades, raising access tracks, relocating low-lying infrastructure where necessary, and fair compensation where irrigators incur costs or constraints in operating safely during higher river events. Supporting adaptation on the ground at community scale is likely to deliver more durable outcomes than broad policy settings alone.

Continued investment in infrastructure should be a high priority to protect and maximise the investment in water for the environment along with property rights certainty for consumptive users. The existence of the RIT infrastructure not only delivers water for irrigation, industry and human needs but also benefits water quality through its drainage and salinity management systems along with delivery of environmental watering to key areas of ecological importance.

RIT asks that the Review expressly recognise irrigation infrastructure as enabling infrastructure for Basin Plan outcomes. RIT infrastructure supports productive use, critical human water needs, environmental water delivery, salinity and drainage management, metering and compliance. Where Basin Plan reforms create new requirements or risks for that infrastructure, the associated costs should be assessed, funded and implemented in partnership with the affected operator rather than left to remaining irrigators through higher fixed charges.

Environmental Watering – Support with Safeguards

RIT supports improved coordination, transparency and efficiency in environmental water management. As an organisation that proudly partners with the CEWH in delivering environmental water through Trust infrastructure onto Trust-owned land and Renmark Paringa Council-owned land, we recognise the value of strategic, evidence-based delivery that maximises ecological benefit per megalitre.

RIT's support for environmental watering is practical and longstanding. Since partnering with the CEWH, the Trust has delivered environmental water through its infrastructure to thirteen local sites in the Renmark district. This demonstrates that viable irrigation networks can help deliver environmental outcomes efficiently by combining local knowledge and fit-for-purpose infrastructure.

However, environmental water planning and delivery must operate within clear safeguards. Third-party impacts on irrigation delivery and reliability must be assessed and disclosed. Operational changes affecting river levels, timing or water quality must consider downstream irrigation offtakes. Governance arrangements must ensure that environmental objectives do not inadvertently compromise irrigation infrastructure or water quality standards required for horticulture.

In particular, water quality outcomes are critical for irrigation productivity. Salinity and other quality parameters directly affect crop performance and long-term soil health. Water quality management must therefore be treated as both an environmental and an agricultural productivity issue.

We recommend that the Review incorporate explicit irrigation impact assessment within environmental watering decision-making processes.

Constraints Management and Higher Flows

The Discussion Paper recognises that progress on constraints relaxation has been slow and complex.[3]

RIT considers constraints management to be a necessary component of achieving environmental outcomes efficiently. If higher flows are required to achieve ecological objectives (as indicated in the SDL Initial Assessment), those flows should be enabled through structural and operational reform rather than through additional recovery alone.

However, constraints programs must provide clarity on property rights and liability, ensure fair and transparent compensation where private assets are affected, include risk frameworks that protect irrigation infrastructure and community assets, and avoid creating hidden reliability reductions for irrigators.

Testing higher flows in the River Murray system must be conducted cautiously and transparently, with community engagement and clear communication of trade-offs.

For Renmark and other lower River Murray communities, any testing of higher flows must be matched with equally practical testing of local impacts. This should include pump and offtake performance, access to low-lying assets, bank stability, flood preparedness, water quality changes, insurance and liability exposure, and the cost of modifying private and Trust infrastructure. Higher-flow objectives should not be pursued through hidden transfer of risk to local communities.

Water Trading Rules and Infrastructure Operators

Water markets are an essential adaptation tool for irrigation communities.

Allocation trade allows irrigators to manage seasonal risk. Leasing and carryover mechanisms provide flexibility. The Discussion Paper indicates that trading rules are generally working as intended, with some proposed refinements. Further detail on the refinements is necessary – rules for water entitlement as a property right should be treated equally regardless of whether for consumptive or environmental use to ensure confidence in the system.

From the perspective of an irrigation infrastructure operator, refinements must not increase administrative burden without clear and evidenced benefit, introduce ambiguity in approval processes, undermine timely trade approvals, or create additional compliance costs that will ultimately be borne by irrigators.

Infrastructure operators serve as approval authorities and delivery managers. Regulatory adjustments must recognise the operational realities of these roles. We recommend that all government authorities and decision makers undertake targeted consultation with irrigation infrastructure operators to model practical implications of any trading rule amendments before finalisation.

RIT supports market integrity and transparency, but cautions against reforms that slow approvals, duplicate existing obligations or create uncertainty about the role of infrastructure operators. Any change to rules concerning environmental water delivery exemptions,

[3] 2026 Murray-Darling Basin Plan Review – Discussion Paper snapshot, p 9.

entitlement tagging, trade restrictions or approval authority obligations should be subject to operator-level testing before finalisation. Trade rules should preserve equal treatment of water entitlements as property rights and should not create a perception that environmental water can access preferential pathways unavailable to other entitlement holders.

Critical Human Water Needs and Operational Frameworks

The Discussion Paper notes that changes to Critical Human Water Needs volumes in the River Murray are not proposed.

While RIT supports strong protections for town water supplies, operational tier triggers and drought response mechanisms can have indirect impacts on irrigation reliability and delivery arrangements.

Under hotter and drier climate scenarios, tiered responses may be triggered more frequently. The Review should therefore model downstream irrigation impacts under tier activation scenarios, clarify operational trade-offs transparently, and ensure that irrigation communities are not exposed to unexamined reliability risk.

Transparency in drought response frameworks strengthens trust and enables proactive planning.

RIT also asks that critical human water needs planning recognise the role of regional delivery networks that supply domestic, industrial and community water needs. In districts such as Renmark, irrigation infrastructure can be part of the practical pathway for meeting essential water needs. Drought and tiered response planning should therefore consider the operational consequences for Trust infrastructure, customer communications, water quality management and cost recovery.

Water Quality and Basin Health

Recent water quality incidents across the Basin have demonstrated system vulnerability.

For irrigation communities, water quality is not solely an environmental matter. It affects crop yield and quality, soil health, long-term land value, and irrigation infrastructure maintenance. An example of water quality impact on irrigation infrastructure maintenance can be found in the Bryozoan issue faced by RIT and other piped irrigation infrastructure operators.

The Review should strengthen integration between water quality objectives and irrigation outcomes, particularly in the lower River Murray where salinity management remains critical.

Water quality monitoring, modelling and reporting should explicitly include irrigation-relevant indicators.

For RIT, irrigation-relevant indicators should include salinity/electrical conductivity, turbidity, dissolved oxygen, algal and toxin risks, organic loads, blackwater risks, biofouling organisms such as bryozoans, and parameters that affect filtration, pumping, crop productivity and long-term soil health. These indicators should be reported in a form that is usable by irrigation infrastructure operators and growers, with early warning triggers and clear responsibilities for response.

Socio-Economic Considerations and Community Stewardship

The Basin Plan is a long-term reform. Its success depends on maintaining community confidence.

Irrigation infrastructure operators such as RIT are not only service providers – we are long-standing community institutions. Our financial stability underpins infrastructure maintenance, metering and compliance integrity, environmental watering participation, and local employment.

The Review should incorporate explicit assessment of irrigation operator viability under proposed reforms, recognition of fixed-cost recovery challenges in smaller districts, and consideration of transitional support where policy changes impose structural cost increases.

Socio-economic assessment should be undertaken at a scale that captures local and district-level impacts. Basin-wide or regional averages can mask the effect of reform on smaller districts, permanent horticulture communities and operators with high fixed infrastructure costs. The Review should therefore include specific metrics for remaining irrigator charges, renewal expenditure deferred because of policy impacts, employment exposure, land use change, stranded assets and the capacity of local operators to keep supporting environmental delivery partnerships.

A healthy Basin requires healthy communities.

Recommendations

RIT respectfully recommends that the 2026 Review:

- include irrigation water security, permanent horticulture viability and irrigation infrastructure operator viability as explicit and measurable Review outcomes;
- prioritise the efficient use of water already recovered, constraints reform, environmental works and measures, fish passage, habitat restoration, pest management and water quality interventions before considering any additional water recovery or adjustment that reduces the consumptive pool;
- model and disclose irrigation reliability impacts under climate and tiered drought scenarios;
- require irrigation impact assessments for environmental watering, higher-flow testing, constraints measures, river operations changes and regulatory reforms;
- provide clear property rights, liability, compensation and cost-recovery frameworks where higher flows, changed operations or environmental watering affect private, community or Trust assets;
- maintain accessible, efficient and timely water trading arrangements and consult directly with infrastructure operators before any trading rule amendments are finalised;
- integrate irrigation-relevant water quality indicators, including salinity, turbidity, dissolved oxygen, algal risks and biofouling, within Basin health monitoring and reporting;
- recognise irrigation infrastructure as enabling infrastructure for productive use, critical human water needs, water quality management and environmental water delivery, and provide targeted adaptation funding where reforms impose new costs;

- undertake socio-economic assessment at a district scale so impacts on smaller irrigation communities and permanent horticulture regions are not masked by Basin-wide averages; and
- engage directly and early with irrigation infrastructure operators, including RIT, on Review recommendations, implementation design and practical delivery pathways.

Conclusion

Renmark Irrigation Trust supports the objective of a healthy working Murray–Darling Basin.

We recognise the importance of environmental outcomes and will continue to engage constructively. However, balance must remain key. Irrigation-dependent communities require reliable, secure and affordable water to sustain permanent plantings and regional economies.

The next phase of Basin reform should strengthen environmental efficiency using water already recovered while protecting the viability of irrigation networks and the communities they serve.

Water security for irrigation is not an opposing objective to environmental sustainability. It is part of the same system. Reform has a higher chance of success if both are advanced together.

RIT's position is that the next stage of reform should be practical, evidence-based and partnership-driven. The Basin Plan will have greater legitimacy if communities can see that environmental gains are being pursued through efficient use of recovered water and targeted complementary measures, while the productive base and delivery infrastructure of irrigation communities are protected.

Renmark Irrigation Trust welcomes continued engagement with the MDBA and would be pleased to participate in further consultation as the Review progresses.

Healthy rivers need healthy communities. This is where we live, work and play. We need to protect and improve the environment while also ensuring communities across the system remain strong and sustainable for future generations.

Humphrey Howie
Presiding Member

James John
Interim Chief Executive Officer