

Mr Andrew McConville
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February 15, 2026

Dear Andrew,

The Murray Regional Strategy Group (MRSG) appreciates the opportunity to contribute to the Basin Plan Review Discussion Paper. Our members invest significant time, expertise, and resources into preparing evidence based submissions, and we value a consultation process that reflects this effort.

We wish to raise a concern regarding the Terms and Conditions requiring submitters to agree to the use of artificial intelligence (AI) to evaluate and summarise submissions.

AI cannot replace human expertise

Submissions to the Basin Plan Review involve complex hydrological, agricultural, economic, community-level and personal experience evidence. These issues require contextual understanding and subject-matter expertise that AI tools cannot reliably replicate. MRSG has already observed AI-generated summaries in previous MDBA processes, specifically the 2025 Basin Plan Evaluation Questions, which contained factual errors and misinterpretations. This experience has reduced community confidence in AI-based assessment.

Risk of bias and misrepresentation

The Terms and Conditions do not explain what AI systems will be used, how they were trained, or how bias will be managed. Without this transparency, submitters cannot reasonably consent to AI driven evaluation. MRSG is particularly concerned that AI models trained primarily on MDBA generated environmental material may default to an environmental first interpretation of evidence, unintentionally minimising or dismissing information relating to productivity, food and fibre output, or regional socio-economic impacts. This creates a real risk that submissions offering balanced, practical, on ground perspectives will be misrepresented or undervalued in the Review process.

Community confidence requires human-led review

Given the significance of the Basin Plan Review and the effort required to prepare submissions, MRSG expects that all submissions will be read and evaluated by qualified human reviewers.

Departure from established departmental practice

We also note that the use of AI is not a standard practice by governmental department consultation processes. The current IGWC review, for example, contains no provisions for AI-based evaluation and instead follows basic privacy terms and conditions. The MDBA's decision to use AI in this extremely important process (without clear justification, safeguards, or an opt-out mechanism) places submitters in an unprecedented position and risks undermining confidence in the Review.

Requested clarifications

MRSRG respectfully asks the MDBA to:

1. Confirm that all submissions will be read and assessed by human experts.
2. Ensure any AI-generated summaries are verified by humans before use.
3. Provide transparency regarding the AI systems and safeguards in place.
4. Allow submitters to opt out of AI-based processing without penalty.

These steps would help restore confidence in the integrity of the consultation process and ensure that Basin communities' contributions are accurately understood and genuinely considered.

to your response and to working constructively with you in the months ahead.

Yours sincerely,

Geoff Moar

Chair – Murray Regional Strategy Group

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