

How the department has responded to the Natural Resources Commission Review Recommendations for the Water Sharing Plan for the Coffs Harbour Area Unregulated and Alluvial Water Sources 2009

This document outlines how the department has responded to the independent review of the *Water Sharing Plan for the Coffs Harbour Area Unregulated and Alluvial 2009* under S43A of the *Water Management Act 2000*.

Water sharing plans are statutory instruments under the *Water Management Act 2000* (the Act). They prescribe how water is managed to support sustainable environmental, social, cultural and economic outcomes. They intend to provide certainty regarding rules for water sharing for water users over the life of the water sharing plan, which is typically 10 years, unless it is extended.

The *Water Sharing Plan for the Coffs Harbour Area Unregulated and Alluvial 2009* (the Plan) commenced on 1 August 2009 and was due to expire 30 June 2020.

The Natural Resources Commission (NRC) has a role under Section 43A of the Act to review water sharing plans within five years of expiry and report to the Minister on:

- the extent that the plan's water sharing provisions have materially contributed to the achievement of, or failure to achieve, environmental, social and economic outcomes
- if changes to plan provisions are warranted.

The [final review report](#) is available on the NRCs website.

The NRC may recommend extending or replacing the Plans depending on its review findings. In this instance the NRC recommended the replacement of the plan. This replacement must be done by no later than 30 June 2022.

Tables 1 and 2 below outline the recommendation and suggested actions arising from the NRC review and the status of the response to these actions by the Department of Planning and Environment – Water (the department).

Table 1. Department response to NRC Review Recommendations

The Natural Resources Commission recommended (April 2020)	Action taken against NRC recommendation (May 2022)
Overall	
<p>1 That the Plan is:</p> <ul style="list-style-type: none"> a. extended for two years until June 2022 to complete studies, monitoring and assessment b. replaced by June 2022 considering the recommendations and suggested actions in this review and the findings from (a), ensuring that the Plan firstly protects the water source and its dependent ecosystems and secondly provides for basic landholder rights above other uses. 	<p>Closed</p> <p>The plan was extended for two years and a replacement plan is expected to commence on or before 1 July 2022.</p>

Environmental outcomes

The Natural Resources Commission recommended (April 2020)	Action taken against NRC recommendation (May 2022)
<p>2 In the next two years during Plan development, collect evidence (as required) and transparently report to:</p> <ul style="list-style-type: none"> a. describe the natural flow regime incorporating data from recommendation 12 b. map and ground-truth the presence and extent of water and groundwater dependent environmental assets including estuarine and coastal ecosystems c. identify key assets and ecosystem functions, their conditions and the factors driving their condition. Classify high priority ecosystems and high ecological value waterways including those assets identified in (b) d. define the flow (and groundwater) requirements of key assets and functions e. determine the impact of the Plan (including seasonal variations) on the flow regime in (a) and key assets and functions flow requirements in (d). 	<p>Closed</p> <p>The department has completed the risk assessment for the Coffs Harbour plan area.</p> <p>This has included a single reach model that compares the flow regime with and without extraction to determine the likelihood that extraction will impact ecological values. The risk assessment uses the high ecological value aquatic ecosystem (HEVAE) framework to determine ecological values.</p> <p>HEVAE identifies and defines a range of in-stream values (or level of importance) for freshwater river reaches. These values inform priority areas to focused water management, to benefit all water users including the environment. It adopts 4 criteria: diversity, distinctiveness, naturalness and vital habitat. Each criterion relies on state-wide availability of in-stream value data to produce consistent spatial mapping outcomes.</p> <p>High probability groundwater dependent ecosystems (GDEs) have been identified and mapped based on the latest available information and method. There is high confidence that the mapping is accurately identifying existing GDEs that are vegetated.</p>

The Natural Resources Commission recommended (April 2020)	Action taken against NRC recommendation (May 2022)
<p>3 Improve consideration of groundwater by building on groundwater assessment processes used for recent inland water sharing plans specifically to:</p> <ul style="list-style-type: none"> a. identify high, medium and low priority groundwater dependent ecosystems in the Plan and refer to them explicitly as relevant in any groundwater dependent ecosystem protection provisions b. clearly define groundwater terms and their relevance to the Plan, including connectivity, ecological value, potential and type – connectivity should include both discharge of groundwater to surface water and surface water recharge to groundwater systems c. establish a coastal floodplain alluvial groundwater source and appropriate rules to bring governance of these licences and their extraction under the Water Management Act 2000 d. review set back distances for work near identified groundwater dependent ecosystems based on the NSW Aquifer Interference Policy 2012. 	<p>Closed</p> <p>The replacement plan uses the most recent GDE identification and mapping. We have an identification process that uses the most up to date information and assigns an ecological value to each GDE identified. See, “Methods for the identification of high probability groundwater dependant vegetation ecosystems”. The plan also includes provisions to be updated with new information if it becomes available.</p> <p>The department is working on a process to confirm the presence of GDEs if there is a request to build infrastructure within restricted distances.</p> <p>Our GDE policy limits protection to high-priority GDEs. Moderate and low-priority GDEs were not considered in the replacement plan.</p> <p>Set back distance rules for new works near GDEs were reviewed and updated to align with standard distance rules as recommended appropriate by hydrogeological expertise.</p> <p>Groundwater terms used in the plan are defined in the plan.</p> <p>The Coffs Harbour Area Coastal Floodplain Alluvial Groundwater Water Source has been included in the draft plan to manage alluvial groundwater below the tidal limit.</p>

- 4** Understand and better protect planned environmental water:
- a. during Plan development, define and assess the impacts of extraction:
 - i. gather data on farm dam location and capacity alongside other extraction mechanisms and model cumulative impacts on each waterway’s flow regime
 - ii. determine the spatial and temporal variation in extraction for each waterway and water source
 - iii. assess impacts of extraction on each waterway’s flow regime and each water source’s environmental, social and economic outcomes, including estuarine and coastal function.
 - b. audit changes in entitlements under the Plan, defining entitlement on issue in each water source and where this has increased during the Plan
 - c. if an increase in entitlement overlaps with water sources of high instream value, determine any risks that may occur as a result of this increase
 - d. using (a) through (c), define a numeric long term average annual extraction limit (LTAAEL) in the remade Plan and include a provision to adjust it if required in year five based on recommendation 2
 - e. if required, implement the provision in (c) and associated measures in year five to bring LTAAEL to the level required to protect the volume of planned environmental water identified in recommendation 2
 - f. monitor and provide an annual publicly available report summarising the estimated extraction volume and methods of licenced extraction in each water source.

Closed

The risk assessment developed as part of plan replacement assessed the impacts of extraction. It assumed full usage of entitlement as actual usage data is unknown. The assessment looked at a range of different flows and used reach-scale ecological data. It included an analysis of risks to estuaries, riverine environments and groundwater dependent ecosystems.

Entitlement values were reviewed and updated where necessary.

The way the LTAAEL has been described in the plan has been reviewed. It has been divided into a standard LTAAEL and higher-flow LTAAEL. The Standard LTAAEL is fixed at the volume at the commencement of the replacement plan for entitlement and first water sharing plan for basic landholder rights. There are very limited circumstances under which the standard LTAAEL can vary, and this is associated with licences being converted from the *Water Act 1912* to *Water Management Act 2000* licences or licences being cancelled for environmental purposes. The LTAAEL has also been updated to be consistent across the coastal systems to include harvestable rights.

The department has calculated the standard LTAAEL as part of the remake of coastal unregulated river water sharing plans and has expressed the LTAAEL in the plan as a volume. The department is not setting a numerical value for the higher flow LTAAEL as this figure can change over the life of the plan.

The draft plan also includes an amendment provision to move to sustainable extraction limits should they be developed in the term of the plan, providing the amendments do not substantially change a LTAAEL.

The non-urban water metering framework requires extraction information to be telemetered or reported by December 2023. Once this information is available it will be possible to do compliance against the LTAAEL.

As part of the implementation of increase to harvestable rights in coastal-draining catchments a catchment-based assessment will be done to determine the appropriateness of the 30% limit on the

The Natural Resources Commission recommended (April 2020)	Action taken against NRC recommendation (May 2022)
	<p>capture of average regional rainfall runoff. This assessment will consider specific catchment characteristics, farm dam locations and capacities, cumulative impacts and effects on downstream flows.</p> <p>As an MER plan is developed for the area consideration can be given to reporting volume of water taken and frequency of take.</p>

The Natural Resources Commission recommended (April 2020)	Action taken against NRC recommendation (May 2022)
<p>5 Protect key environmental assets’ flow requirements and maintain natural flow variability and connectivity:</p> <ul style="list-style-type: none"> a. if extraction shifts significantly towards in-river extraction, or at year two of the Plan (whichever occurs earlier), re-assess the cease to pump thresholds and raise them as required to protect the low flow requirements of environmental assets and functions b. design and implement provisions at Plan commencement to protect the flow requirements of key environmental assets b. implement additional mechanisms, such as protection of freshes and small floods, as necessary outside the Plan to maintain natural flow variability and ecosystem function including estuarine, coastal and coastal lagoon berm function. 	<p>Closed</p> <p>As stated in actions for recommendation 2 and 4, the plan rules were revised on the basis of a risk assessment undertaken for the Coffs Harbour plan area.</p> <p>This, and the HEVAE framework (see response 2) address cease-to-pump and commence-to-pump provisions and flow requirements of environmental assets.</p> <p>The water sharing plan area has no gauges suitable to measure low flows and there are limited suitable locations for gauging infrastructure to be installed. Managing access to low flows is limited to observing visible flow at certain locations. This limits the types of access rules that can be applied in these water sources and the availability of information to monitor the effectiveness of the plan.</p> <p>The department will continue to work with WaterNSW to look for opportunities to improve monitoring infrastructure in this area that can support better planning outcomes in the future. Noting that there are limited suitable sites to install gauging infrastructure in this plan area and dependent on availability of resources.</p> <p>If new gauges were able to be installed there will not be sufficient flow data available during the life of the replacement plan to amend cease-to-pump thresholds.</p> <p>Other protections have been applied, such as restrictions on new works and restrictions on trade of water to protect estuarine, riverine and GDEs.</p>

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<p>6* Incorporate climate change impacts:</p> <ul style="list-style-type: none"> a. ensure the Plan functions appropriately under a range of climate change scenarios b. review and revise Plan provisions based on the climate modelling and allow for Plan amendments to address longer-term water availability based on evidence of changing climatic conditions. 	<p>Closed</p> <p>Setting the LTAAEL at a fixed volume will ensure the planned environmental water component does not decrease in a drying climate during the life of the plan. As the cease-to-pump thresholds are all based on visible flow, this will maintain the same protection of low flows under a changing climate.</p> <p>Plans operate for 10 years at which time they may be reviewed.</p> <p>The department will work toward priorities in the State Water Strategy. Priority 4 of the State Water Strategy is to increase resilience to changes in water availability (variability and climate change).</p> <p>The 2021/22 action plan looks to improve and apply our understanding of climate variability and change. Including work to determine a methodology and progressively incorporate climate risk data into water sharing plan and environmental water management decision making.</p>

Social and cultural outcomes

- 7*** Continue work to improve Aboriginal engagement and outcomes:
- a. strengthen and expand the nation-by-nation engagement developed as part of the inland water resource plan process to coastal areas and to other representative Aboriginal groups.
 - b. use the strengthened engagement process to identify Aboriginal values and uses, objectives and outcomes, and flow allocations in the Plan area, then link these to strategies, performance indicators and measuring and reporting requirements
 - c. simplify licence categories and processes for Aboriginal water access that can address cultural, environmental, social and economic values and uses.
 - b. include a timeframe of three months to initially amend the Plan following any native title determinations and Indigenous Land Use Agreements, and a further 12 months to undertake detailed engagement, final amendment and allocation process.

Closed

The department reached out to several Aboriginal organisations in the Coffs Harbour area and have met several times with the Coffs Harbour and District Local Aboriginal Land Council to discuss the water sharing plan. Consultation will continue with Aboriginal organisations over the life of the plan.

As part of ongoing work by the department will work toward priorities in the State Water Strategy. Priority 2 of the State Water Strategy is the Recognise First Nations/Aboriginal Peoples' rights and values and increase access to and ownership of water for cultural and economic purposes.

The NSW Government recognises First Nations/Aboriginal Peoples' rights to water and our aim is to secure a future where water for First Nations/Aboriginal Peoples is embedded within the water planning and management regime in NSW, delivering cultural, spiritual, social, environmental and economic benefit to communities.

Actions under the State Water Strategy include:

- Strengthening the role of First Nations/Aboriginal Peoples in water planning and management
- Developing a state-wide Aboriginal water strategy
 - Providing for Aboriginal ownership of and access to water for cultural and economic purposes
- Working with First Nations/Aboriginal Peoples to improve shared water knowledge
- Working with First Nations/Aboriginal Peoples to maintain and preserve water-related cultural sites and landscapes

The department is committed to providing greater opportunities for Aboriginal water management and participation in water sharing. A new Aboriginal water directorate has been established within the department and work is progressing on an Aboriginal Water Strategy, which will identify the ways in which we can achieve the priorities under the State Water Strategy. We are establishing an integrated framework for reviewing and reporting against the NSW Water Strategy at least every five years.

Economic outcomes

The Natural Resources Commission recommended (April 2020)	Action taken against NRC recommendation (May 2022)
<p>8 Assess the economic dependence of each water source, with the assessment broken down into the full range of economic benefits and impacts including:</p> <ul style="list-style-type: none"> a. extractive industries (for example intensive horticulture, forestry) b. non-extractive industry (for example tourism, aquaculture, recreational and commercial fishing) c. community and ecological services (for example amenity, suitable water quality, recreation, flood mitigation through natural coastal lagoon function). 	<p>Closed</p> <p>The department used economic information available during the replacement process. The available information is not at a scale that is suited to water sources or even water sharing plan areas, so it was difficult to incorporate into the water sharing plan.</p> <p>Collection of information as suggested by the NRC can be considered as the Monitoring, Evaluation and Reporting (MER) plan for this area is developed.</p>
<p>9 Confirm trading boundaries and rules are ecologically appropriate using baseline data including updated high instream value mapping, and data on hydrologic connectivity and downstream impacts.</p>	<p>Closed</p> <p>Trade rules in the plan were reviewed based on the new HEVAE mapping and likelihood information in the risk assessment. Where appropriate, changes were made to trade rules.</p>

Monitoring, evaluation and reporting

The Natural Resources Commission recommended (April 2020)	Action taken against NRC recommendation (May 2022)
<p>10 Finalise the MER framework for coastal water sharing plans by the end of 2020, adequately fund its implementation and include the following as part of the replacement Plan Improve implementation, assessment of outcomes, future planning and adaptive management by including additional monitoring, evaluation and reporting requirements:</p> <ul style="list-style-type: none"> a. provisions for Plan-specific MER requirements following the established framework-and including both freshwater and estuarine ecosystems at a minimum b. clear governance arrangements for monitoring, evaluation and reporting, including roles and responsibilities c. timely and regular public reporting of the results of monitoring and evaluation activities to support transparency, public awareness and active compliance d. appropriate governance arrangements and timeframes for adaptation and improvement, particularly in response to new information. 	<p>Closed</p> <p>The department is developing a monitoring, evaluation and reporting (MER) framework.</p> <p>Implementation of the Water sharing plan Evaluation Program will commence in 2021–22 and will be reported annually through the Water Sharing Plan Implementation Program commencing in 2022/23. This will clarify the roles and responsibilities, reporting requirements, governance arrangements and timeframes associated with the program.</p>

The Natural Resources Commission recommended (April 2020)	Action taken against NRC recommendation (May 2022)
<p>11* Set strong foundations to improve implementation and measurements of Plan outcomes:</p> <ul style="list-style-type: none"> a. develop objectives, strategies and performance indicators that are strongly linked to the Act’s environmental, social and economic outcomes, and in line with the Act’s priorities b. develop specific, measurable, achievable, relevant and time-bound (SMART) objectives, strategies and performance indicators. 	<p>Closed</p> <p>Implementation of the Water Sharing Plan Evaluation Program will commence in 2021–22 and will be reported annually through the Water Sharing Plan Implementation Program commencing in 2022/23.. This will clarify the roles and responsibilities, reporting requirements, governance arrangements and timeframes associated with the program. Evaluation Plans will include key evaluation questions, indicators and measures mapped to water sharing plan objectives, strategies and performance indicators that are linked to the WM Act's outcomes. This will align with the WM Act priorities.</p> <p>Adaptive management is a key component of the <i>Water Management Act 2000</i> and is included in the MER framework.</p>
<p>12 Monitor streamflow, water extraction and use:</p> <ul style="list-style-type: none"> a. identify suitable gauging locations and implement river flow monitoring arrangements to collect local data and provide a transparent evidence base for hydraulic modelling and management and planning decisions b. implement additional measures such as metering beyond the new NSW non-urban water metering framework to understand extraction and support decision making, adaptive management and improve public confidence c. implement mechanisms to quantify and account for rainfall runoff harvesting d. release a report by year two of the Plan outlining findings from (a) through (c) and either implement steps to measure total extraction (including basic landholder rights) or justify no action, providing a roadmap for ongoing steps. 	<p>Closed</p> <p>The department will continue to work with WaterNSW to look for opportunities to improve monitoring infrastructure in this area that can support better planning outcomes in the future. Noting that there are limited suitable sites to install gauging infrastructure in this plan area and dependant on availability of resources.</p> <p>Metering requirements for this coastal area apply from December 2023. This will help inform decision making and compliance with the LTAAELs.</p> <p>The department estimates that NSW's new non-urban water metering rules will capture around 95% of licensed water take infrastructure capacity across NSW.</p> <p>Government will consider the existing metering thresholds in the NSW's new non-urban water metering rules as part its statutory review of the non-urban water metering framework. This review is due to commence after 2023 when the new non-urban water metering framework is fully implemented.</p>

Table 2. Department response to NRC Review suggested actions

NRC suggested actions for the department to support the replacement Plan (April 2020)		Action taken against NRC suggested actions (May 2022)
Environmental outcomes		
A	Complete specific, local scale studies incorporating detailed assessments of existing take along with hydrological, ecological and socio-economic studies for any water source under consideration for increased harvestable rights extraction. The potential impacts should be assessed in detail, consulted with the broader affected communities and transparently reported.	<p>Closed</p> <p>As part of the implementation of increase to harvestable rights in coastal-draining catchments a catchment-based assessment will be done to determine the appropriateness of the 30% limit on the capture of average regional rainfall runoff. This assessment will consider specific catchment characteristics, farm dam locations and capacities, cumulative impacts and effects on downstream flows.</p> <p>Plan amendment provisions will be assessed in terms of any required supporting studies.</p> <p>Evaluation of water sharing plans will also provide key information to inform future plan replacement.</p>

NRC suggested actions for the department to support the replacement Plan (April 2020)		Action taken against NRC suggested actions (May 2022)
<p>B</p>	<p>Outline a transparent process that can be initiated to review water sharing arrangements if climate change results in significant changes in the water available in the system.</p>	<p>Closed</p> <p>Setting the Standard component of the LTAAEL at a fixed volume will ensure the planned environmental water component does not decrease in a drying climate during the life of the plan. As the cease-to-pump thresholds are all based on visible flow, this will maintain the same protection of low flows under a changing climate.</p> <p>Plans operate for 10 years at which time they may be reviewed.</p> <p>The department will work toward priorities in the State Water Strategy. Priority 4 of the State Water Strategy is to increase resilience to changes in water availability (variability and climate change).</p> <p>The 2021/22 action plan looks to improve and apply our understanding of climate variability and change. Including work to determine a methodology and progressively incorporate climate risk data into water sharing plan and environmental water management decision making.</p>

C* Fund and implement integrated catchment actions to improve riverine and estuarine health objectives drawing on relevant agencies across the cluster of Planning, Industry and Environment

Closed

Water sharing plans are developed in accordance with the requirements of the WM Act and cannot direct catchment actions not related to water sharing.

That said the department will work toward priorities in the State Water Strategy. Priority 4 of the State Water Strategy is to increase resilience to changes in water availability (variability and climate change). Action 4.4 under this priority is to better integrate land use planning and water management.

The Government will work to better integrate strategic land use planning with water management frameworks and outcomes. Taking steps to:

- establish processes to support communication and early engagement to better inform land use, agriculture and industry investment decisions based on a clear understanding of water availability and constraints, and water allocation risk over the immediate and longer term
- develop new planning policies, if required, to integrate land use and water cycle management decisions
- identify opportunities for the planning system to support water resource health and resilience in a changing climate; for example, through strategic recognition of critical groundwater resources in coastal areas and mitigate impacts from urban development d. improve access to information about water availability to support development
- examine opportunities for information on high value water-dependent ecosystems and cultural values to be considered in land use planning decisions.

Social and cultural outcomes

NRC suggested actions for the department to support the replacement Plan (April 2020)		Action taken against NRC suggested actions (May 2022)
<p>D*</p>	<p>Integrate the NSW river flow and water quality objectives into the Plan. Revisit the objectives during community consultation to agree on currency of objectives and develop community understanding to improve participation in Plan development and implementation.</p>	<p>Closed</p> <p>The plan includes specific environmental objectives that are expanded on in the MER Framework. The plan has limited ability to control water quality as this can only be done through water sharing rules. The systems are also all unregulated river systems so flows cannot be held back or released for water quality and river flow objectives. The plan protects river flows through access rules, trade rules and works approval rules.</p> <p>The department will work toward priorities in the State Water Strategy. Priority 3 of the State Water Strategy is to improve river, floodplain and aquifer ecosystem health, and system connectivity.</p> <p>An action under this priority is to include a more intense, state-wide focus on improving water quality. Government will continue to monitor and review the NSW Water Quality Objectives across NSW to ensure they reflect contemporary community and environmental values and uses, define clear roles, accountabilities and frameworks for monitoring, assessing and addressing water quality risks across the state and ensure the community can access information about water quality.</p>

NRC suggested actions for the department to support the replacement Plan (April 2020)	Action taken against NRC suggested actions (May 2022)
<p>E* Develop the NSW Aboriginal Water Framework by end-2020 to provide consistent and transparent guidelines and resourcing for Aboriginal water access and involvement in water planning and management. At a minimum, the framework should consider:</p> <ul style="list-style-type: none"> a. relevant guidelines and legislation, including any need for legislative reforms b. Aboriginal water values and its uses c. processes for allocating water for Aboriginal interests including cultural, environmental, social and economic purposes d. processes for improving Aboriginal water access and use, through simplified licencing or other identified mechanisms e. clear requirements for including native title determinations and proactive processes for undertaking other land/water use agreements f. strengthened Aboriginal engagement processes across the state to expand on the basin engagement process, broaden the stakeholder base (to include Traditional Owners, Nations, Local Aboriginal Land Councils and other relevant groups), and increase Aboriginal staff with capacity to lead and maintain engagement. g. appropriate Aboriginal-led governance and decision-making arrangements, such as an Aboriginal Water Holder h. adequate resources including dedicated Aboriginal staff with capability in water planning and management, and funding, such as an Aboriginal Water Trust. 	<p>See actions under recommendation 7 above.</p>

Economic outcomes

NRC suggested actions for the department to support the replacement Plan (April 2020)	Action taken against NRC suggested actions (May 2022)
<p>F* Improve trading opportunities and economic outcomes:</p> <ul style="list-style-type: none"> a. publish a transparent overarching process for assessing trades for approval b. support improvements to price reporting by licence holders c. increase education and awareness of trading arrangements, including the use of metering to increase trade opportunities d. investigate trade drivers and barriers through stakeholder engagement processes, including with Aboriginal stakeholders. 	<p>Closed</p> <p>We are working collaboratively with WaterNSW to ensure trade information collected is reported and reliable.</p> <p>Groundwater trade assessment information is available in the Assessing groundwater applications fact sheet.</p> <p>WaterNSW has recently updated their trade form to enable more information to be collected including information around \$0 trades.</p> <p>We have developed a Trade Dashboard that provides transparency to water market participants.</p> <p>Consultation has included discussions around trade opportunities and barriers.</p> <p>The department will work toward priorities in the State Water Strategy. Priority 5 of the State Water Strategy is to support economic growth and resilient industries within a capped system.</p> <p>An action under this priority is to improve the operation and transparency of water trade in NSW. Government will look to improve the operation of the NSW water market by improving the transparency of trading activities and access to information about these activities, reviewing the need for a regulatory framework covering water brokers and intermediaries to improve confidence in how the market is regulated.</p>

Plan development and implementation

- G*** Adopt processes that support clear and transparent implementation of the Plan:
- a. finalise and implement the Reasonable Use Guidelines by the end of 2020 and include the agreed standards as part of the replacement Plan to adequately estimate and enforce basic landholder rights
 - b. develop simple and concise plan documents, minimising cross referencing and improving clarity
 - c. strengthen existing processes for stakeholder engagement developed as part of the water reform action plan, and include an area-specific stakeholder engagement plan – this needs to specify appropriate forums for engagement, such as a stakeholder advisory panel, including formal engagement with a range of stakeholders with diverse interests and localised knowledge of water.

Closed

Reasonable use of basic landholder rights is being considered separately to the water sharing plan replacement process.

Consultation on plan replacements will continue to occur in-line with the communications and engagement plans developed for the replacement process.

The water sharing plan template has been updated to improve readability.

Supporting information has been developed that is in plain English. This includes the background document, rules summary sheets, FAQs and a fact sheet.

The department will work toward priorities in the State Water Strategy. Priority 1 of the State Water Strategy is to build community confidence and capacity through engagement, transparency and accountability. Some of the actions under this priority include:

- Improve engagement, collaboration and understanding
- Increase the amount and quality of publicly available information about water in NSW
- Review the regulation of domestic and stock basic landholder rights

The Government will:

- improve how the water sector engages with communities about water management and make it much easier for water users and the broader community to engage with and understand water management and how decisions are made.
- continue to improve the quality and range of water-related information made publicly available and ensure it is easy to find, search and navigate.
- review and consult with the community about how domestic and stock basic landholder rights are regulated.

NRC suggested actions for the department to support the replacement Plan (April 2020)		Action taken against NRC suggested actions (May 2022)
H*	Continue to work with the Natural Resources Access Regulator to understand compliance and enforcement risks in the Plan area and incorporate findings into Plan development and ongoing improvement in implementation.	<p>Closed</p> <p>The draft plan was developed in consultation with NRAR, who were kept informed of any proposed rule changes. NRAR provided advice on appropriate wording to use to aid developing simple, meaningful and enforceable conditions.</p>

Those recommendations and actions marked with an asterisk (*) are strategic initiatives which the Commission believes the department should implement across NSW to support all water sharing plans outcomes.