

12 August 2021

Bryce Wilde
 Executive Director
 Natural Resources Commission
 Level 6, Martin Place
 Sydney NSW 2000

Dear Bryce,

Audit of the implementation of the Coastal Unregulated and Alluvial Water Sharing Plans 2016

Thank you for your letter dated 15 June 2021 and the final audit report for the implementation of the Coastal Unregulated and Alluvial Water Sharing Plans 2016 (WSPs) as required by Section 44 of the *Water Management Act 2000* (Act).

As requested, we have reviewed the report and provide the responses set out below.

WaterNSW notes that the audit concluded overall that not all the provisions of the WSPs have been given full effect in accordance with the Act. We also note that there are recommendations that are addressed to WaterNSW, NRAR and DPIE-Water as the coordinating agencies. WaterNSW remains committed to working with DPIE-Water and NRAR in the implementation of the relevant recommendations.

Table 1 WaterNSW Response to Audit findings and Recommendations

Findings	Recommendations
<p>F 2 The Malpas Dam release requirements set out in Clause 28 of the Macleay Plan were not met on numerous occasions between 1 July 2016 and 25 March 2021.</p>	<p>R2.3 WaterNSW to share rating change information with Armidale Council for the two river gauging stations at Gara River - Willow Glen gauge (206035) and downstream Malpas Dam gauge (206039) - to ensure the automatic release valve programming is reflective of Willow Glen (206039) gauge flows.</p>
<p>WaterNSW Comment: WaterNSW will advise Armidale Council that ratings and changes are available from the real time data website. WaterNSW recommends that Armidale Council can obtain the required information directly from the website relating to Malpas Dam and any other gauges operated by WaterNSW on Armidale Council's behalf.</p>	

Findings	Recommendations
<p>F 6 Whilst provisions relevant to each plan are set up in the water accounting system (with the exception of carryover in some water sources), comprehensive extraction data is not available to enable the management of individual accounts to ensure maximum allowable take is not exceeded in accordance with Part 8 or 9 (as relevant) of the WSPs.</p>	<p>R 6.1 WaterNSW to obtain reliable extraction data for individual WALs in these coastal unregulated and alluvial systems and use it to ensure maximum allowable take is not exceeded as set out under Part 8 or 9 (as relevant) of these coastal unregulated and alluvial plans.</p> <p>R 6.2 WaterNSW to complete account configuration for the water sources in these coastal unregulated and alluvial plans.</p>
<p>WaterNSW Comment:</p> <p>R 6.1 WaterNSW is committed to its role in enlivening the NSW non-urban metering policy which includes increased measurement and recording of extraction data. We are committed to obtain reliable extraction data for all individual water access licences wherever possible, noting not all water users may have metering installed, nor be required to install metering. In these cases WaterNSW is limited in its ability to obtain reliable extraction data for all individual water access licences in these coastal groundwater systems and use it to ensure maximum allowable take is not exceeded as set out under Part 8 of each plan.</p> <p>R 6.2 WaterNSW will complete account configuration for the water sources in these coastal unregulated and alluvial plans in line with the policy requirement.</p>	

Table 2: WaterNSW Response to Audit observations and Suggested Actions

Observations	Suggested actions to support recommendations
<p>O 4.2 In 2016/17, the Water Register, in some cases depending on the search method used, it is not clear which the Available Water Determination (AWD) was applied to accounts.</p>	<p>SA 4.2 WaterNSW to ensure that Water Register is transparent in terms of how sub-categories are applied to WALs and to enable water sources to be clearly searchable within a water sharing plan to improve transparency of how AWDs were applied to accounts.</p>
<p>O 8 The NSW Water Register contains dealing related information which is incomplete and uses old terminology.</p>	<p>SA 8 WaterNSW to increase the accuracy and extent of the dealings information available the NSW Water Register for improved transparency.</p>
<p>WaterNSW Comment (O4.2 and O8): WaterNSW remains committed to improving transparency and will consider the recommendation as part of its investment into enhanced capabilities as part of its digital transformation program "WAVE" which includes a new water accounting module and customer portal and data management capabilities.</p>	

If you have any questions or comments on the above, please contact David Stockler, Executive Manager Customer and Community (david.stockler@waternsw.com.au; +61416182382).

Yours sincerely,



Andrew George
Acting Chief Executive Officer