

# How the Department has responded to the Natural Resources Commission Review Recommendations for the Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2009

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This document outlines how the Department has responded to the independent review of the *Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 2009* under S43A of the *Water Management Act 2000*.

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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 about water sharing for water users over the life of the water sharing plan, which is typically 10 years, unless it is extended.

*Water Sharing Plan for the Lower North Coast Unregulated and Alluvial Water Sources 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 NRC website.

The NRC may recommend extending or replacing the Plan depending on its review findings. In this instance the NRC recommended the replacement of the Plan. This replacement must be complete 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)
<b>Overall</b>	
<p><b>1</b></p> <p>That the Plan is:</p> <ul style="list-style-type: none"> <li>a. extended for a further two years until June 2022</li> <li>b. replaced by June 2022, to address the recommendations and suggested actions of this report.</li> </ul>	<p><b>Closed</b></p> <p>The plan was extended for two years and a replacement plan is expected to commence by 1 July 2022.</p>

### Environmental outcomes

- 2 To adequately establish and maintain planned environmental water, the department should:
- a. When developing the replacement Plan, revisit and amend the long term average annual extraction limit (LTAAEL) at Plan commencement, including providing a numeric LTAAEL in the Plan and make these publicly available to improve transparency and minimise confusion for water users
  - b. investigate the potential take of water under harvestable rights at current and full uptake and include harvestable rights in the amended LTAAELs
  - c. Consider ways to address the lack of water extraction data to manage long-term extraction growth with Available Water Determinations (AWD) and monitor extraction limits regularly to protect planned environmental water - in addition, provide adequate information and support water users to assist their understanding of performance in relation to LTAAEL of performance of extraction limits.
  - d. undertake an audit of water access licences issued since Plan commencement to determine if their granting was consistent with the Plan and the Act, and to understand and manage the scale of increases.
  - e. In the replacement Plan, amend the share components listed in the Plan as at Plan commencement following the audit.
  - f. Reassess potential impacts of high flow conversions on the flow regime and environmental values and encourage the adoption of high flow conversions where appropriate.
  - g. given the lack of metering and monitoring review the effectiveness of conversions and their impact on groundwater systems before granting licence conversions.

**Closed**

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 creating a set 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 provided 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 becomes available it will be possible to do compliance against the LTAAEL.

Current licence entitlement in each water source has been updated. During this process some licences have been identified in the wrong water source. These errors to be corrected.

The appropriateness of high flow conversion licences have been reviewed and changes made to ensure only water sources that can support high flow conversions allow them. This assessment included a review of impact of extraction on GDEs, instream and downstream ecological factors.

The Natural Resources Commission recommended (April 2020)		Action taken against NRC recommendation (May 2022)
3*	Implement a transparent timely process of notifying all licensees of any changes to water access conditions within three months of a Plan amendment across all plans to ensure all appropriate provisions are in force.	<p><b>Closed</b></p> <p>The department is working closely with WaterNSW and informing them of proposed plan changes. Information will be provided to WaterNSW as soon as possible and WaterNSW will re-issue licence conditions where necessary in a reasonable timeframe.</p>
4	<p>To strengthen environmental water sharing rules, the department should:</p> <ul style="list-style-type: none"> <li>a. define water sharing rules including flow classes based on environmental water requirements and prioritise the protection of water sources and their dependent ecosystems based on continuing risk assessments of coastal water sharing plans</li> <li>b. build on existing hydrological flow studies and assess estuarine flow requirements, including adequate flows to support fish passage and other key species and protect Aboriginal, cultural and heritage values and sites</li> <li>c. investigate ways to better support implementation of Individual Daily Extraction Limits (IDELs), this should include improved monitoring and compliance activities and clearer communication and engagement with water user associations</li> <li>d. assess the wider benefits of a water use accreditation scheme and, if positive, implement a scheme in priority water sources (including those with high instream values, high economic dependence and high hydrologic stress)</li> </ul>	<p><b>Closed</b></p> <p>The department has adopted the High Ecological Value Aquatic Ecosystem (HEVAE) framework. HEVAE aims to identify and define a range of instream values (or level of importance) for freshwater river reaches in NSW. These values enable the prioritisation of areas for focused water management, to benefit all water users including the environment. The department has adopted four criteria, diversity, distinctiveness, naturalness and vital habitat. Each of the four criteria relies on state-wide availability of instream value data, to enable the production of consistent spatial mapping outcomes.</p> <p>Decisions around flow classes and access rules consider the instream, downstream and GDE values and impact on these values from extraction. The risk assessment considers the value of each estuary and evaluates the risks of extraction impacting on the ecological values of the estuaries.</p> <p>Access rules have considered fish passage. For example, modified access rules have been suggested for the Karuah River water source to ensure the passage of Australian Bass past the Stroud Weir during migration periods.</p> <p>The department does not intend to use new accreditation schemes as part of the water sharing plan. This is due to the difficulty of administering these schemes and the need for schemes to be able to directly benefit river flows or water quality.</p>

The Natural Resources Commission recommended (April 2020)	Action taken against NRC recommendation (May 2022)
<p><b>5</b> During the development of the Replacement Plan over the next two years collect (as required) and report (reviewed in year four at a minimum) to:</p> <ul style="list-style-type: none"> <li>a. describe the natural flow regime</li> <li>b. map and ground-truth the presence and extent of water and groundwater dependent environmental assets including estuarine and coastal ecosystems</li> <li>c. identify key assets and classify high priority ecosystems and high ecological value aquatic ecosystems using the High Ecological Value Aquatic Ecosystem framework including those assets identified in (b)</li> <li>d. define flow and groundwater requirement for key assets</li> <li>e. determine the impact of the Plan on the flow regime in (a) and flow requirements key assets—in (d).</li> </ul>	<p><b>Closed</b></p> <p>The department has completed the risk assessment for the Lower North Coast plan area.</p> <p>This has included a single reach model that compares the flow regime with and without extraction to determine the likelihood of whether 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 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><b>6*</b> To improve consideration of groundwater in the Replacement Plan, the department should:</p> <ul style="list-style-type: none"> <li>a. identify low and medium priority groundwater dependent ecosystems in the Plan and refer to them explicitly as relevant in any groundwater dependent ecosystem protection provisions</li> <li>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</li> <li>c. standardise set back distances for work near identified groundwater dependent ecosystems based on the NSW Aquifer Interference Policy 2012</li> <li>d. identify groundwater sources with high environmental, social or economic value, monitor groundwater-levels and quality, and undertake on-ground studies to determine the presence and absence of confining beds throughout the system.</li> </ul>	<p><b>Closed</b></p> <p>The replacement plan uses the most recent GDE identification and mapping, which uses the best available information and method.</p> <p>We have an identification process that uses the most up to date information and assigns an ecological value to each GDE identified. See, "<a href="#">Methods for the identification of high probability groundwater dependant vegetation ecosystems</a>". 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 hydrological expertise.</p> <p>Groundwater terms used in the plan are defined in the plan.</p> <p>The Lower North Coast Coastal Floodplain Alluvial Groundwater Source has been included in the draft plan to manage alluvial groundwater below the tidal limit.</p>

The Natural Resources Commission recommended (April 2020)	Action taken against NRC recommendation (May 2022)
<p><b>7*</b></p> <p>To improve consideration of climate change in the Plan, the department should:</p> <ul style="list-style-type: none"> <li>a. transparently model the impacts of various climate regimes to ensure the Plan functions appropriately under a range of scenarios</li> <li>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.</li> </ul>	<p><b>Closed</b></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.</p> <p>The appropriateness of access rules has been considered based on the longest record of flow available including the most recent 2019/20 drought.</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>
<p><b>Social and cultural outcomes</b></p>	
<p><b>8*</b></p> <p>Continue processes to finalise the reasonable use guidelines for stock and domestic use and include agreed standards as part of the replacement Plan:</p>	<p><b>Closed</b></p> <p>Reasonable use of basic landholder rights is being considered separately to the water sharing plan replacement process.</p>
<p><b>9*</b></p> <p>Include a timeframe of three months to undertake initial amendments of the plan following native title determinations and other land/water use agreements, and enough time to undertake the detailed engagement, final amendment and allocation process.</p>	<p><b>Closed</b></p> <p>No native title determinations exist in the Lower North Coast plan area. Where native title determinations are granted that include a volume of water the water sharing plan will be amended as soon as practical provided the amendments do not substantially change a LTAAEL.</p> <p>Amendments commonly take approximately six months to process as it requires sign off by multiple Ministers.</p>

The Natural Resources Commission recommended (April 2020)	Action taken against NRC recommendation (May 2022)
<p><b>10*</b> Identify Aboriginal values and uses, objectives and outcomes, and flow allocations mechanisms for access in the replacement the plan, using a strengthened engagement process. (see Sections 4.2.3 and 4.4) This should use relevant guidelines, be well-resourced, and include a specific process and clear timeframe for development in consultation with Aboriginal stakeholders.</p>	<p><b>Closed</b></p> <p>The department reached out to several Aboriginal organisations in the Lower North Coast area. Consultation will continue with Aboriginal organisations over the life of the plan.</p> <p>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.</p> <p>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.</p> <p>Actions under the State Water Strategy include:</p> <ul style="list-style-type: none"> <li>• Strengthening the role of First Nations/Aboriginal Peoples in water planning and management</li> <li>• Developing a state-wide Aboriginal water strategy</li> <li>• Providing for Aboriginal ownership of and access to water for cultural and economic purposes</li> <li>• Working with First Nations/Aboriginal Peoples to improve shared water knowledge</li> <li>• Working with First Nations/Aboriginal Peoples to maintain and preserve water-related cultural sites and landscapes</li> </ul> <p>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.</p>

The Natural Resources Commission recommended (April 2020)		Action taken against NRC recommendation (May 2022)
11	Allow for investigations of storage facilities where the water is from allowable sources (not third order or higher streams); noting that investigations for any storage facilities must undertake the required impact and cost-benefit studies and ensure that the LTAAEL and environmental flow regimes can be maintained in line with the Plan provisions.	<p><b>Closed</b></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>The water sharing plan includes an amendment provision that requires a review of water sharing rules if it is found that harvestable rights take has increased above 10%.</p> <p>Harvestable rights has been included in the Standard LTAAEL set at the right at commencement of the first plan.</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>
12	Consider the Mid Coast Council’s Drought Management Plan, and any other relevant studies, to ensure the plan aligns with them and accommodates identified risks to town water supply.	<p><b>Closed</b></p> <p>The department is familiar with Mid Coast Council’s Drought Management Plan and has met with Mid Coast Council a number of times to discuss the draft water sharing plan.</p>

**Economic outcomes**

The Natural Resources Commission recommended (April 2020)		Action taken against NRC recommendation (May 2022)
13	<p>Assess the economic dependence of each water source in the Plan area to inform Plan provisions, with the assessment described in the Replacement Plan's background document considering the full range of economic benefits and impacts including:</p> <ul style="list-style-type: none"> <li>a. extractive industries (for example dairy, beef)</li> <li>b. non-extractive industry (for example tourism, aquaculture)</li> <li>c. community and ecological services (for example amenity, suitable water quality).</li> </ul>	<p><b>Closed</b></p> <p>An economic impact assessment was undertaken for water sources where changes to access rules were being considered. The results of this assessment influenced the decisions that were made. This assessment considered both extractive and non-extractive industries.</p>
<b>Monitoring, evaluation and reporting</b>		
14*	<p>By 2020, finalise the draft NSW MER framework for coastal water sharing plans to inform the development of the replacement Plan. This should include:</p> <ul style="list-style-type: none"> <li>a. a plan-specific MER program following established guidelines</li> <li>b. clear governance arrangements for MER including roles and responsibilities</li> <li>c. timely public reporting of the results of monitoring and evaluation activities to support transparency, public awareness and active compliance</li> <li>d. appropriate governance arrangements and timeframes for adaptation and improvement, particularly in response to new information.</li> <li>e. metering and record keeping provisions consistent with the NSW Government's planned new framework for measuring and metering of water take.</li> </ul>	<p><b>Closed</b></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)
15*	<p>Improve the foundations for monitoring, evaluation and reporting on the Replacement Plan by including:</p> <ul style="list-style-type: none"> <li>a. specific, measurable, achievable, relevant and time-bound (SMART) objectives, strategies and performance indicators that align with the water management principles in the Act and clearly address the prioritisation of environmental, social (including native title) and economic outcomes</li> <li>b. clear logical links demonstrated between the objectives, strategies, performance indicators and rules.</li> </ul>	<p><b>Closed</b></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>

Table 2. Department response to NRC Review suggested actions

NRC supporting actions for the department for replacement Plan (April 2020)	Action taken against NRC recommended actions (May 2022)
<b>Environmental outcomes</b>	
<p><b>A*</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><b>Closed</b></p> <p>Setting the Standard 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 a flow volume, 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>
<p><b>B</b></p> <p>If the NSW Government considers re-commissioning and using the Barnard Scheme in future, undertake and publish a comprehensive study on downstream impacts on the environment and reliability of supply for users in the Lower North Coast.</p>	<p><b>Closed</b></p> <p>This will be considered if the Barnard scheme is recommissioned.</p>

<p><b>C</b></p>	<p>Fund and implement integrated catchment actions to improve riverine and estuarine health objectives drawing on relevant agencies across the DPE cluster.</p>	<p><b>Closed</b></p> <p>Water sharing plans are developed in accordance with the requirements of the WM Act and cannot direct catchment actions not related to water sharing.</p> <p>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.</p> <p>The Government will work to better integrate strategic land use planning with water management frameworks and outcomes. Taking steps to:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• develop new planning policies, if required, to integrate land use and water cycle management decisions</li> <li>• 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</li> <li>• examine opportunities for information on high value water-dependent ecosystems and cultural values to be considered in land use planning decisions.</li> </ul>
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NRC supporting actions for the department for replacement Plan (April 2020)

Action taken against NRC recommended actions (May 2022)

Social and cultural outcomes

<p>D*</p>	<p>Continue development of a 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 strategy should</p> <ul style="list-style-type: none"> <li>a. relevant guidelines and legislation, including any need for legislative reforms</li> <li>b. Aboriginal water values and its uses</li> <li>c. processes for allocating water for Aboriginal interests including cultural, environmental, social and economic purposes</li> <li>d. process for improving Aboriginal water access and use, through simplified licencing or other identified mechanisms</li> <li>e. clear requirements for including native title determinations and proactive processes for undertaking other land/water use agreements</li> <li>f. strengthened Aboriginal engagement processes across the state to expand on the basin engagement process, broaden the stakeholder base, and increase Aboriginal staff with capacity to lead and maintain engagement.</li> <li>g. appropriate Aboriginal led governance, funding and resources, including dedicated Aboriginal staff with capability in water planning and management.</li> </ul>	<p>See actions under recommendation 10 above.</p>
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**E\*** Adopt processes that support key social outcomes throughout the remake and implementation of the Replacement Plan:

- a. enhance communication of the Plan through active, simple, and consistent language and modes of communication
- b. improve implementation and enforcement of the Plan using clear and consistent governance, roles and responsibilities
- c. strengthen processes of stakeholder engagement, including a stakeholder engagement panel and an appropriate forum for engagement (such as a stakeholder advisory panel) – make sure it includes a range of stakeholders with diverse interests and knowledge of water, and responds to the unique coastal context of this Plan
- d. better communicate the current balance "equitable" water sharing and include a relevant performance indicator.

**Closed**

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.

**Economic outcomes**

NRC supporting actions for the department for replacement Plan (April 2020)		Action taken against NRC recommended actions (May 2022)
<p><b>F*</b></p> <p>The department should continue to implement their program to improve all trade information. In finalising the program. The department should coordinate with agencies to:</p> <ul style="list-style-type: none"> <li>a. support improvements in price reporting by licence holders</li> <li>b. ensure account management rules are fit for purpose and implementable</li> <li>c. ensure consistent alignment of plan provisions and licence conditions for trade</li> <li>d. consider environmental and industry impacts as part of any review of trade rules.</li> </ul>	<p><b>Closed</b></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 <a href="#">Assessing groundwater applications fact sheet</a> (PDF 95 KB).</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 <a href="#">Trade Dashboard</a> that provides transparency to water market participants.</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. An action under this priority is to improve the operation and transparency of water trade in NSW.</p> <p>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>	
<b>Monitoring, evaluation and reporting</b>		
<p><b>G*</b></p> <p>Identify Plan-specific and state-wide research needs and knowledge gaps across all water sharing plans, and seek to address these gaps in collaboration with other organisations and research institutions.</p>	<p><b>Closed</b></p> <p>Future information needs are identified in the background document to the draft replacement plan.</p>	
<p><b>H*</b></p> <p>Make all monitoring, modelling and research associated with the Plan publicly available to improve accountability and transparency.</p>	<p><b>Closed</b></p> <p>The department will make studies used to determine draft plan rules available on their website.</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.