

Murray–Darling Basin Authority’s submission to the New South Wales Natural Resources Commission review of the *Water Sharing Plan for the Castlereagh Unregulated River Water Sources 2011*.

Introduction

Thank you for the opportunity to provide input prior to the commencement of the review of the *Water Sharing Plan for the Castlereagh Unregulated River Water Sources 2011*. The Murray-Darling Basin Authority (MDBA) welcomes the review and acknowledges the work undertaken by the Natural Resources Commission (NRC) to date.

The MDBA has been working closely with New South Wales Department of Planning, Industry and Environment (DPIE) to develop accreditable water resource plans (WRPs) in accordance with the requirements of the Basin Plan 2012. This includes the Macquarie Castlereagh Surface WRP. The MDBA is also working with NSW and Queensland to develop environmental works and measures under the ‘[Toolkit](#)’ to support implementation of the Basin Plan in the Northern Basin.

The MDBA received all NSW proposed groundwater WRPs by 9 April 2020 and all NSW proposed surface water WRP’s by 30 June 2020. The MDBA is currently formally assessing these WRP’s against Chapter 10 of the Basin Plan. The MDBA will continue working with NSW to ensure as many as possible of the proposed NSW WRPs submitted are available to the Commonwealth Minister for Water for an accreditation decision as soon as possible.

The proposed NSW WRPs will incorporate specific clauses from NSW water sharing plans, some of which have been amended or re-made for the purpose of Basin Plan consistency. This will mean that the NRC’s program of scheduled reviews of current NSW Murray-Darling Basin water sharing plans, may be examining water sharing arrangements that have been amended or re-made.

For the purposes of the NRC review of the *Water Sharing Plan for the Castlereagh Unregulated River Water Sources 2011*, the proposed Macquarie-Castlereagh Surface WRP will incorporate provisions from the amended/re-made water sharing plans that cover the water resources previously managed through the *Water Sharing Plan for the Castlereagh Unregulated River Water Sources 2011*.

Recent reviews and assessments relevant to the Castlereagh water resources

The following is a list of relevant information sources that may help to inform the NRC review of the *Water Sharing Plan for the Castlereagh Unregulated River Water Sources 2011*.

- [Hydrologic assessment of flow changes in the northern Basin](#). This report provides a hydrological analysis on the assessment of changes in flow due to the effects of climate change and variability, as well as other factors, including river regulation.
- [MDBA compliance review](#). The MDBA and an Independent Panel conducted a Basin-wide Compliance Review at the request of the Australian Government. The review assessed the legislative, policy and practical implementation of compliance in water management across the Basin. As an outcome of this process, the five Basin state governments and the Australian Government agreed to a series of compliance commitments and actions, which are close to fully implemented and are captured in the [2018 Murray-Darling Basin Compliance Compact](#).
- [Basin Plan evaluation framework](#). The Evaluation Framework is used by the MDBA to evaluate if the Basin Plan is on track. The most recent Basin Plan evaluation was completed in March 2021 and is available [here](#). The MDBA encourages the NRC to review this document in terms of issues and outcomes.
- [Northern Basin Review](#). This review includes a wealth of information concerning the economic, social and environmental outcomes from water recovery in the Northern Murray-Darling Basin.

Northern Basin Toolkit projects

Out of the Northern Basin Review came a series of [Toolkit](#) measures and initiatives to complement and support the implementation of the Basin Plan, which guides how water is managed and used sustainably in the Basin. The measures and initiatives, along with other activities in the northern Basin, will protect water for the environment, improve compliance with water laws, and create opportunities for local communities, including First Nations peoples.

The MDBA recommends that the NRC consider the performance of the Water Sharing Plan for the *Water Sharing Plan for the Castlereagh Unregulated River Water Sources 2011* in the context of these Toolkit measures and initiatives. Potential changes to provisions in water sharing plans that progressed toolkit measures would, in our view, enable those plans to better meet their environmental, social and economic outcomes.

Other Issues

- [SDL Health Check](#). Accounting of water use and diversions and monitoring of compliance against the requirements of the Basin Plan is critical to the delivery and success of the Plan. To ensure that best practice is applied to the SDL water accounts, the MDBA commissioned an Independent Review to undertake a health check of the SDL accounting framework.

- In response to the review and to improve the SDL accounting framework, MDBA has published the '[Sustainable diversion limit \(SDL\) accounting framework improvement strategy 2020 – 2025](#)'. The MDBA has developed a schedule to guide progress for continuous improvement and to ensure integrity. These include material risks to the delivery of the Basin Plan as well as risks to the perception and communication of the SDL accounting framework.
- The MDBA suggest the NRC analyse the quality and availability of the Castlereagh River gauging station network and the river flow information that results from it. It has been MDBA's experience that the information coming from this network is not up to the required standard.

Conclusion

The MDBA welcomes the NRC's upcoming review of the *Water Sharing Plan for the Castlereagh Unregulated River Water Sources 2011* and would be happy to discuss the matters raised in this submission with the NRC in order to inform the conduct of the review.