



Nature Conservation Council

The voice for nature in NSW

Natural Resources Commission

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Submission: DRAFT Evaluation framework for the review of water sharing plans under Section 43A of the Water Management Act 2000

The Nature Conservation Council of NSW (NCC) is the state's peak environment organisation. We represent over 170 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

We welcome the opportunity to comment on the *draft evaluation framework for the review of water sharing plans under Section 43A of the Water Management Act 2000*.

In response to the three specific questions asked by the Commission:

1. Is the document clear in regards to the Commission's role in water sharing plan reviews? If not, what should be clarified?

NCC finds this framework clearly sets out the Commission's role in reviewing water sharing plans. Further, the document provides useful context of the departmental areas of responsibility, and the ways in which water sharing plans link to the *Water Management Act 2000* (the Act).

2. Is the framework clear in regards to the overall approach to undertaking water sharing plan reviews? If not, what should be clarified?

The framework is clear in regards to the overall approach to undertaking water sharing plan reviews. Further, the framework explains succinctly the ways in which the objectives, strategies and associated outcomes in water sharing plans are weakened by not being linked with environmental outcomes stated in water sharing plans.

3. Do you have priority issues you would like to see addressed by the reviews?

NCC's priority issues are addressed by the Commission's water sharing plan review process. The stakeholder consultation process the Commission provides is adequate for NCC to raise any priority issues that aren't covered in the evaluation questions presented by the Commission.

Thank you for the opportunity to participate in the consultation.



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Your key contact point for further questions and correspondence is [REDACTED]. We welcome further conversation on this matter.



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Additional Comments

1. Water sharing plan reviews – purpose and objectives

The explanation of the Commission's role as described in Clause 43 of The Act was clear and useful. The guideline principles taken from the NSW Program Evaluation Guidelines are sound.

The overview of departmental roles and responsibilities is helpful for stakeholders, who are often volunteering their time and deeply concerned about the environmental condition of rivers, aquifers and wetlands, to understand the complex departmental structures in the water management bureaucracy.

NCC and associated member groups have attended interviews with NRC and found them to be professionally run. We have been able to share a lot of information with the Commission, and have seen our input reflected in your reports.

2. Scope and approach for review program

NCC appreciates the explanation provided in section 2.2 Review Scope (page 7):

“Prior to 2020, the objectives, strategies, and indicators of water sharing plans were not specific or measurable. Links between objectives, strategies and associated outcomes in plans continue to be unclear. “

Having to link water sharing plan objectives, strategies and associated outcomes directly to the principles of the Water Management Act, rather than having them linked to each other in the water sharing plan, creates more ambiguity than is necessary when water sharing plan rules are applied. Environmental protection is often compromised as a result.

NCC will continue to support specific environmental outcomes being included in water sharing plans, and directly linked to the stated objectives, strategies and associated outcomes.

The evaluation questions about water sharing plans that are considered by NRC, and asked of stakeholders, are aligned with the scope provided for the Commission in Section 43A of the Act. The points provided under each key question provide a very thorough set of considerations to support stakeholder submissions.

The stakeholder engagement approach detailed in this report is thorough, professional, and reflects the experiences that NCC and associated member groups have had providing feedback to the Commission.