

Our ref: OUT25/8177

Your ref: D25/2821

Professor Hugh Durrant-Whyte
Commissioner
Natural Resources Commission
By email: hugh.durrant-whyte@nrc.nsw.gov.au

13 August 2025

Subject: **Audit of the implementation of seven inland groundwater water sharing plans**

Dear Professor Durrant-Whyte,

I refer to your letter of 26 June 2025 concerning the audit of the implementation of seven inland groundwater water sharing plans (the plans), including:

- *Water Sharing Plan for the Darling Alluvial Groundwater Sources 2020*
- *Water Sharing Plan for the Namoi Alluvial Groundwater Sources 2020*
- *Water Sharing Plan for the NSW Border Rivers Alluvial Groundwater Sources 2020*
- *Water Sharing Plan for the NSW Great Artesian Basin Groundwater Sources 2020*
- *Water Sharing Plan for the NSW Great Artesian Basin Shallow Groundwater Sources 2020*
- *Water Sharing Plan for the NSW Murray Darling Basin Fractured Rock Groundwater Sources 2020*
- *Water Sharing Plan for the NSW Murray Darling Basin Porous Rock Groundwater Sources 2020*

It is pleasing to note that the report included positive findings with elements of the plans being implemented by the Department of Climate Change, Energy, the Environment and Water – Water Group (the Department), including:

- significant progress in implementing the processes related to performance indicators
- effectively using the Departments internal database systems, the Water Management Hub, to track and manage amendments.

The report has also identified areas where further work is required as soon as practicable within a maximum timeframe of 12 months for full implementation, including:

- Use of finalised annual extraction data in calculations across all cases to determine long term average annual extraction limit (LTAAEL) compliance, to manage risk of any inconsistency with plans.
- Improved communication to water licence holders of their eligibility to take water according to plan access provisions to enable compliance with extraction provisions.

- Implementation of Aboriginal cultural performance indicators and development of the method statement to effectively monitor and adapt these plans in line with Aboriginal cultural outcomes.
- Addressing the gap in assessing impacts of proposed works on groundwater-dependent culturally significant areas, which may result in these areas being inadequately protected

The Department has considered each of these findings and recommendations with suggested actions, and our detailed response is in the attached table. All these recommendations are accepted or accepted in principle.

The Department is progressing work that will contribute to addressing matters identified in this and other audits including:

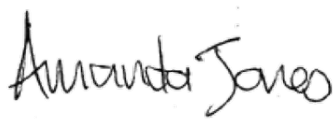
- Development and implementation of the Aboriginal cultural method statement and collect data on Aboriginal cultural performance indicators to assess cultural outcomes. (Recommendation R1.1).
- Development of procedures and systems relating to water supply work approvals (Recommendations R6.1, R6.3a).

I understand that WaterNSW is reviewing the audit actions assigned to them. They will provide a separate response to these. The Department continues to work collaboratively with WaterNSW to ensure consideration and implementation of NRC recommendations.

If your office requires any additional information or to discuss these matters further, please contact Mitchell Isaacs, A/Executive Director, Water Planning, at mitchell.isaacs@dcceew.nsw.gov.au

I would like to thank the Commission for its work in this important process.

Yours sincerely,

A handwritten signature in black ink that reads "Amanda Jones". The signature is written in a cursive, flowing style.

Amanda Jones
Deputy Secretary Water

Table 1: Audit findings and recommendations relevant to NSW Department of Climate Change, Energy, the Environment and Water (the Department).

- *Water Sharing Plan for the Darling Alluvial Groundwater Sources 2020*
- *Water Sharing Plan for the Namoi Alluvial Groundwater Sources Order 2020*
- *Water Sharing Plan for the NSW Border Rivers Alluvial Groundwater Sources 2020*
- *Water Sharing Plan for the NSW Great Artesian Basin Groundwater Sources 2020*
- *Water Sharing Plan for the NSW Great Artesian Basin Shallow Groundwater Sources Order 2020*
- *Water Sharing Plan for the NSW Murray Darling Basin Fractured Rock Groundwater Sources Order 2020*
- *Water Sharing Plan for the NSW Murray Darling Basin Porous Rock Groundwater Sources Order 2020*

No.	Final Findings	No.	Final Recommendations	DCCEEW Water Response
1.1	DCCEEW-Water have made significant progress to develop systems and processes to guide monitoring, evaluation and reporting (MER) activities for groundwater water sharing plans. Evaluation methods and data collection on Aboriginal cultural use remains a notable gap. The Commission highlights the importance of being able to define, monitor and assess water sharing plan implementation with respect to Aboriginal cultural outcomes. DCCEEW-Water are seeking required funding to support scoping of the method.	1.1	DCCEEW-Water to: • develop and implement the Aboriginal cultural method statement • collect data on Aboriginal cultural performance indicators to assess cultural outcomes.	The Department has also identified a gap in the collection of performance indicators to assess Aboriginal cultural outcomes. The final outcome of the 2025 IPART determination will determine whether this work has funding to commence. Funding for resources to scope and develop an Aboriginal cultural method statement has been identified in the WAMC request to IPART to better assess plan performance. The Department accepts this finding and recommendation.

No.	Final Findings	No.	Final Recommendations	DCCEEW Water Response
2.1	The Commission identified gaps in the DCCEEW-Water LTAAEL compliance calculations including a lack of clarity on whether basic landholder rights (BLR) had been included in LTAAEL calculations. The Commission noted that assessment periods identified in the LTAAEL compliance spreadsheets were in some cases inconsistent with the periods nominated in the Plans. DCCEEW-Water has since updated the assessment periods and BLR volumes consistent with the Plan provisions and has indicated that these will be carried through to determination of annual extraction volumes and LTAAEL calculations for the 2024-2025 period. In cross checking data provided by DCCEEW-Water, the Commission also identified some inconsistencies in datasets used to determine annual extraction. This included inconsistencies in the annual extraction volumes used in the DCCEEW-Water internal spreadsheet and dashboard and volumes reported by WaterNSW in the water register. DCCEEW-Water and WaterNSW advised that the inconsistency in data sets observed by the Commission is due to annual extraction data not being finalised until October each year, with finalised annual extraction figures published on the water register at that time. DCCEEW-Water undertakes initial LTAAEL compliance assessments in late May / early June each year to facilitate Available Water Determination (AWD) announcements. DCCEEW-Water also advised that it reconciles LTAAEL compliance calculations following the finalisation of annual extraction data where this is triggered by an AWD of less than 100% or 1 Megalitre (ML) per unit share or where a water source may be subject to a compliance action.	2.1	DCCEEW-Water to review and, where required, reconcile LTAAEL compliance calculations following the finalisation of extraction data annually in October to ensure consistency and accuracy of data used to support Plan compliance.	The Department has implemented this recommendation in the LTAAEL compliance assessment process. The Department reconciles LTAAEL compliance calculations in late September, if necessary, after WaterNSW closes the water accounts and all metering data are recorded for billing purposes. This necessity arises for groundwater sources with a reduced AWD announced on July 1st or where available water for extraction, if extracted, may trigger a compliance action. Since 2020/21, average annual extraction in all groundwater sources has been declining due to above-average rainfall in NSW since January 2020. This has significantly reduced the risk of LTAAEL compliance breaches after the 2021-2022 water year, so reconciliation in late September in the last few years has been minimal. The Department accepts this finding and recommendation.

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2.1a		2.2	Following implementation of R 2.1, DCCEEW-Water to update explanatory metadata information in internal and public datasets to outline any assumptions and limitations of datasets to improve data transparency.	The Department is committed to improving transparency. Transparency is priority in the NSW State Water Strategy. The Department supports the recommendation to further improve data transparency by providing information and metadata that can outline any assumptions and limitation of the data including for R2.1 and R2.2. As noted in response to 2.1, the system is well-equipped to accommodate future updates to input data and required algorithmic changes. The Department accepts this finding and recommendation
2.2	As per Finding 2.1, the Commission was unable to clarify that all categories of access licences had been considered in the determination of annual extraction volumes due to inconsistencies in datasets and a lack of clarity regarding consideration of BLR volumes. DCCEEW-Water has since provided evidence indicating that BLR volumes, as outlined in Plan provisions, have been carried through to LTAAEL compliance calculation spreadsheets and will be used in annual extraction volumes and LTAAEL compliance calculations in the 2024-2025 water year. Any issues of inconsistencies in annual extraction datasets will be addressed by R 2.1 and R 2.2			

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2.3	The Commission observed that LTAAEL compliance calculations had been undertaken in all groundwater sources sampled. As noted in Finding 2.1, issues related to inconsistencies in datasets were apparent in LTAAEL compliance implementation. These inconsistencies will be addressed by R 2.1 and R 2.2. The Commission identified that LTAAEL assessment periods indicated in the compliance calculations were three years for both the MDB Fractured Rock and MDB Porous Rock Plans. In both cases, these Plans require five year assessment periods. DCCEEW-Water has since updated the assessment periods consistent with the Plan provisions and has indicated that these will be carried through to LTAAEL calculations for the 2024-2025 period. Given this gap has been addressed during the audit period, no further recommendation has been identified.			
2.4	DCCEEW-Water was required to undertake SDL compliance reporting in the 2023-24 water year for the Border Rivers, Darling Alluvial, MDB Fractured Rock and MDB Porous Rock Plans. This is due to the timing of accreditation of relevant water resource plans in 2022 under the Basin Plan. The Plans require the Minister to assess SDL compliance in line with Part 4 of Chapter 6 of the Basin Plan. This role was delegated to DCCEEW-Water. DCCEEW-Water advised the Murray Darling Basin Authority (MDBA) assesses SDL compliance and provide it to DCCEEW-Water for verification. DCCEEW-Water stated that the groundwater SDL compliance figures for the 2023-24 water year were finalised by the MDBA in February 2025, with the MDBA to publish results later this year. The Commission did not receive evidence of DCCEEW-Water's process during the audit period to verify the MDBA's SDL compliance results or assess SDL compliance according to the requirements of clause 27 of the Border Rivers, clause	2.3	DCCEEW-Water to assess compliance with the Basin Plan long-term average SDLs for the groundwater SDL resource units in accordance with the processes set out in Divisions 1 and 3 of Part 4 of Chapter 6 of the Basin Plan. Where the assessment of SDL compliance is undertaken by a third-party agency, that is the MDBA, DCCEEW-Water is to document and implement processes that provide the required assurance that the	The Department submits SDL compliance data to MDBA after completing a self-assessment of compliance outcomes, as required by roles and responsibilities described in the MDBA SDL Compliant Assessment framework. The 2023-2024 SDL assessment is compliant for all groundwater SDL units within both accredited and non-accredited WRPs. The Department acknowledges that SDL assessment spreadsheet was not initially provided to NRC. This is because the spreadsheet was yet to be submitted by the

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	28 of the MDB Fractured Rock or clause 28 of the MDB Porous Rock Plans.		assessment of compliance occurred based on the processes required by the Plans.	MDBA to Inspector General of Water Compliance for assessment of compliance outcome. The Department can provide this SDL compliance assessment workbook, noting it is unpublished and commercial in confidence. The Department accepts this finding and recommendation.
3.1	DCCEEW-Water has previously committed to review, update and publish a transparent framework for making AWDs for groundwater sources by December 2025. Noting the work in progress, this audit observed gaps in existing procedures in application of: ▪ subsequent AWD increases for groundwater sources linked to surface water plan AWDs (in the Namoi Alluvial Plan). ▪ consistency in rounding of decimal places for AWD announcements. DCCEEW-Water has advised that both these compliance issues should be amended by process improvements they have already implemented.			
5.1	Maximum water account debit provisions had predominantly been applied in the Water Accounting System to the access licence categories as required by the Plans. However, instances were identified where annual use limits had not been applied in the Water Accounting System, or were inconsistent between licence categories or components of a licence category that have maximum water account debit provisions in the Plans.	5.1	WaterNSW to apply Annual Use Limits to existing licence categories that have maximum water account debit provisions in the Plans but do not currently have an Annual Use Limit applied in the Water Accounting System.	

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5.2	Carryover provisions across licence categories had predominantly been applied as required by the Plans across the groundwater sources. However, isolated instances in the MDB Fractured Rock Plan and the GAB Plan were identified where this did not occur, and incorrect carryover limits had been applied for licence categories in the Water Accounting System.	5.2	WaterNSW to review and update configuration of carryover rules in the Water Accounting System to align with Plan provisions	
5.3	DCCEE Water advised that groundwater water licence holders can determine their eligibility to take water according to surface water flow class thresholds by viewing gauge data on the WaterNSW WaterInsights Portal for the relevant gauges specified in the Plans. It also advised that where flow class thresholds do not apply to licences, but rules are detailed in the Plan, licensees are to access additional information such as AWD announcements or 324 orders in related surface water plans. The Commission has identified instances where the surface water gauges in the related plans are not in place to monitor water levels that facilitate extraction by these groundwater users. The audit did not receive any evidence to enable the assessment of whether take was occurring according to the access rules specified by the Plans. DCCEE Water and WaterNSW have advised that changing the way information is presented in the WaterInsights Portal would require significant resourcing and would need to be managed against competing priorities. Providing clarity when water users can take water would be beneficial for groundwater systems where access rules are in place across NSW. It is important to take steps to progress this work, while considering other resource requirements.	5.3a	DCCEE Water to build on the gauge data already available in the WaterInsights Portal and to consider other access rules where access of take does not cross reference gauge data to enable the implementation of the access rules identified in the Darling and Namoi Alluvial Plans.	The Department considers the implementation of access rules included in all water sharing plans, primarily by relying on accessible telemetered gauging information from appropriate gauges that are fit for purpose to set access rules. The gauging network is limited, and there is considerable cost for installation and ongoing maintenance of new gauges. Some access rules are not gauge data based as they may not be fit for purpose in that water source; there may be no gauging infrastructure or different rules may be utilised to achieve specific access restrictions that are not gauge based. In these instances, consideration is given to the ability of the licence holder to access the required information to comply with the rule. The Department accepts the recommendation in principle to both build on fit for purpose

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				gauging data and to work on information provided through the WaterInsights Portal to provide further clarity to water users for when they can and cannot take water. Any expansion of the gauging network and expansion of the functionality of the WaterInsights Portal is dependent on resourcing. It is unlikely under the current IPART settings that additional resourcing will be available to progress this recommendation in the foreseeable future. Note also that our state gauging network and the WaterInsights Portal is administered by WaterNSW. More specifically in response to the implementation of the access rules specifically identified in the Audit for the Darling and Namoi Alluvial Plans. These are implementable and to our knowledge well understood by licence holders in these areas. These licences have restricted access conditions depending on surface water availability. The groundwater licences in the Lower Darling cannot access groundwater unless AWDs of the regulated general security licences

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				is 0.5ML/share or less, or if a Sec 324 Orders is in place that prohibits take under Regulated general security licences or if a gauge is below a certain level. All this information is readily accessible on the Department's web site and not onerous for licence holders to check. For the Namoi access rule mentioned it relates to visible flow over a publicly accessible weir. The Department accepts this recommendation in principle.
		5.3b	WaterNSW to develop a tool to clearly communicate to water licence holders when take of water is permitted following the completion of R 5.3a.	
6.1a	The Commission elected not to review DCCEEW-Water's procedures and processes, as the processes and procedures have not been updated since the previous audit. 3 DCCEEW-Water formed the Service Improvement Team in October 2024 and are working on a framework to update licensing and approval procedures and processes, and other licensing approval documents, with a number of these to be completed by December 2025. The Commission's previous groundwater audit in 2023 found	6.1a	DCCEEW-Water to finalise and implement updates to their procedures and systems governing the water supply works approval process. As part of this work, DCCEEW-Water to update procedures and implement new templates to explicitly assess and document compliance with	The Service Improvement Team (within the Metering and Licensing Branch) was formed in October 2024. The team is currently working on a framework to update licensing and approval procedures and processes, and other licensing approval documents (Documents). The framework will include:

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	that DCCEE-Water's process guide, assessment forms and associated documents did not provide adequate guidance or require specific assessment against Part 9 of the water sharing plan provisions.		the rules for water supply works approvals under Part 9 of the Plans and rectify any identified gaps.	• Creation of standardised templates for Documents, • A prioritisation matrix which will guide a risk-based approach to updating Documents, • A document hierarchy which identifies the appropriate approval path based on the document type, • There will be a methodology of storing documents in accordance with record keeping requirements, and • A register that will be kept and maintained by the Service Improvement Team of updated/new resources which will feed into a cyclical review of L&A Documents. • A number of Documents are expected to be updated or created by December 2025. In relation to assessment of water supply work approval applications with the distance rules in Part 9 of the water sharing plans, a draft document has been compiled and is currently in use by assessment officers. The text from this document will be used to populate a standardised template. The Department accepts this recommendation

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6.1b	Since 2023 and the Commission's last inland groundwater plans audit, WaterNSW have made notable improvements to their process guides and assessment forms. The Commission tested samples from Plans with works approved after WaterNSW updated their processes. We found that while progress has been made, further improvements are required to demonstrate all Part 9 Plan requirements have been met. Further details are included in F 6.2 to F 6.6.	6.1b	WaterNSW to review process updates to: ▪ require assessing officers to provide explicit responses in assessment sheets to provide evidence of assessment and state compliance against all relevant Plan clauses including rules to minimise interference between water supply works, restrictions on water supply works near the high bank of a river and high priority groundwater dependent ecosystems. ▪ rectify gaps identified in R 6.2b and R 6.3b and update any processes or procedures as required.	
6.2	WaterNSW has improved their assessment summary sheet templates, which now includes criterion addressing the water management principles. The assessment summary sheets do not however explicitly address the 'General' clauses of Part 9 of the Plans. The Commission believes they cannot be met unless all clauses within Part 9 have been assessed and are compliant. This finding will be addressed through implementation of R 6.1b to R6.3b.			
6.3	The Plans have various rules to minimise interference between water supply works. The Commission has found, as per previous inland groundwater audits, that there is			

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	inadequate evidence that these clauses have all been implemented. The Commission found that there was no, or inadequate, evidence to demonstrate compliance with the following clauses: ▪ minimising impacts for nearby bores, preventing the granting of a BLR water supply works if within 500 metres of a work on another landholding nominated by another access licence, which is not a local water utility access licence ▪ minimising impacts for neighbouring landholders requiring written approval from adjoining landholders if they are within 200 metres of a proposed bore ▪ preventing impacts on local utilities and town water supplies requiring a 1,000 metre buffer from proposed works. This will be addressed by R 6.1b.			
6.4	This audit made findings consistent with previous audits, with multiple gaps in assessment of requirements regarding contamination. This includes the need for a process to support the assessment and documentation of compliance against the Plans' schedule part (c) requirement for assessment of contamination sources. DCCEEW-Water is addressing this issue. Once this process is in place, implementation is required by both agencies to meet plan requirements.	6.2a	DCCEEW-Water to develop a process to support the assessment and documentation of compliance against the Plans' schedule requirement for assessment of contamination sources including 'any site that is or has been the subject of an activity listed in Table 1 of the contaminated land planning guidelines published under the Environmental Planning and Assessment Act 1979 from time to time.'	This process is currently being developed and is due for completion by 30 July 2025. The Department accepts this recommendation.

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		6.2b	WaterNSW to assess and explicitly document compliance against the Plan's schedule requirement for assessment of contamination sources including: any site that has been declared to be significantly contaminated land under the Contaminated Land Management Act 1997; and upon the completion of R 6.2a, any sites 'that are or have been the subject of an activity listed in Table 1 of the contaminated land planning guidelines published under the Environmental Planning and Assessment Act 1979 from time to time'.	
6.5	The Plans have rules to prevent water supply works from being approved within certain distances of high priority groundwater dependent ecosystems, or from the high bank of a river, unless adequate arrangements are in place to protect the ecosystems. We found gaps in evidence to demonstrate compliance with the GAB Plan where the evidence indicated a smaller buffer was considered compared to that required by the Plan, and the MDB Porous Rock Clause 43(1)(b), where the assessment summary sheet was not explicit and the evidence provided			

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	did not demonstrate an assessment of the distance to the high bank of a river. This finding will be addressed by R 6.1b.			
6.6	While agencies carry out Aboriginal Heritage Information Management System (AHIMS) searches, there is no process to identify groundwater dependent culturally significant areas. DCCEEW-Water has advised that they are progressing work to develop a process for identifying groundwater dependent culturally significant areas. Once this process has been developed, both agencies should implement it to meet plan requirements	6.3a	DCCEEW-Water to continue developing a process to support the identification of groundwater-dependent culturally significant areas to enable assessments of potential impacts from proposed water supply works approvals.	DCCEEW- Water will continue to develop process to support identification to groundwater dependant Culturally significant areas. The database currently available for water regulation officers to search for Aboriginal culturally significant sites is the Aboriginal Heritage Information Management System. Groundwater dependence will depend on the nature of the site. Under Action 2.1.1 of the NSW Groundwater Strategy, NSW will develop a program to identify and enhance protection of groundwater-dependent cultural sites and values in a culturally appropriate way (Note this is dependent on availability of resources and funding). This is to be informed by the NSW Aboriginal Water Strategy and Action Plan. The NSW Aboriginal Water Strategy and Action Plan is in the final phase of its development following feedback received from aboriginal stakeholders during its public exhibition in late 2024. Objective 3

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				and Key Actions 3.1-3.2 of the Department's Consultation Paper proposes to collaborate across the Department and with aboriginal people when assessing applications under the WM Act and developing water management plans and policies. Once the NSW Aboriginal Water Strategy and Action Plan is finalised it will help to frame groundwater specific implementation activities (dependant on availability of resources and funding). The Department accepts this recommendation.
		6.4b	Upon completion of R 6.3a, WaterNSW to assess and document compliance with the provisions under Part 9 of the Plans for water supply works near groundwater-dependent culturally significant areas.	
7.1	The Water Licencing System (WLS) processes dealings and reports 71O, 71P, 71R, 71S and 71W dealings as a bundle of dealing types. The Plans prohibit 71O dealings (conversion to a new licence category) and many of the Plans prohibit 71R (amendment of licence share component) dealings. ⁴ The Commission's sampling identified no prohibited dealing types, with most sampled trades 71W, and also 71S and 71P dealings.	7.1	WaterNSW to update the naming conventions for dealings under WMS to ensure dealing names and system reports accurately reflect dealings undertaken to demonstrate compliance and improve data quality.	

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	WaterNSW has identified that the bundled naming of dealings is a system limitation in WLS, and the only way to identify which dealing type was processed is to open and review each dealing's details. The bundling of dealings types could mask prohibited dealings. The Commission understands that WaterNSW's long-term intention is for dealings to be processed in a new system being developed under the Water Market System (WMS) program.			
7.2	The Commission determined that the Plan's and Access Licence Dealing Principles Order 2004 (ALDPO) dealings provisions were largely complied with. One of the 71W samples did not include evidence of all documentation required to assess compliance with ALDPO clause 20(5). The Commission has found an instance where there is no evidence of compliance with Plan provisions. If the ALDPO clause has not been met, a dealing could have been approved which was prohibited. This could impact local groundwater levels or conditions and have environmental, economic or social impacts. Similar issues and recommendations have been identified in previous audits	7.2	WaterNSW to update the assessment summary sheet structure and process for dealings to: ▪ require assessing officers to provide explicit responses in assessment sheets for each relevant Plan and Access Licence Dealing Principles Order 2004 clause ▪ remove default positions on answers to promote active entry of answers by assessing officers.	
8.1	The non-urban metering reforms are now in place across all the inland groundwater plans subject to this audit. Under the Regulation, access licences that are exempt from the requirement for a water supply works approval and those that are used for the purpose of prospecting or fossicking for minerals or petroleum, must have mandatory metering equipment and reporting conditions placed on the access licence. As part of the previous	8.1	DCCEEW-Water to complete work to identify access licences that require relevant non-urban water metering requirements to be applied as mandatory conditions in the inland groundwater plans, and apply appropriate	The Department previously commenced work to identify access licences that require relevant non-urban water metering requirements to be applied as mandatory conditions, and will continue pending system enhancements to WLS.

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	groundwater audit, the Commission recommended DCCEEW-Water complete work to identify access licences that require relevant non-urban water metering requirements to be applied as mandatory conditions and that this be actioned as appropriate. Licences issued as State Significant Developments, State Significant Infrastructure, or as part of mining projects were not tested as part of the current audit sample. DCCEEW-Water advised that they have not identified a suitable process to identify licences where works approvals are not required. DCCEEW-Water advised that they are continuing to work with WaterNSW to implement enhancements to WLS to allow these licences to be identified. Given this work by DCCEEW-Water has not been completed, the extent of the impact of this gap during the audit period is unknown.		mandatory conditions where required.	The Department accepts this recommendation.
8.2	The sample did not include the required mandatory condition regarding water supply works construction conditions. DCCEEW-Water noted that this was due to a change in process, whereby the construction condition used to be applied on an individual basis. DCCEEW-Water was able to provide an example of a work approval where this mandatory construction condition was applied in the Namoi Plan. However, this approach has since changed where the construction condition is now being applied universally across all water supply works approvals. DCCEEW-Water has indicated that they will apply the required mandatory condition across all water supply works during the next bulk notification round. The Commission would support broad application of the condition in line with the requirements of the Plan.	8.2	DCCEEW-Water to apply the mandatory condition to all work approvals in the Namoi Alluvial Groundwater Plan that requires approval holders to construct the water supply works within three years of being granted as identified in clause 61(5) of the Plan.	A different process had been used previously in relation to clause 61(5), which the Department agrees potentially led to gaps in the application of conditions. The Department is already progressing this recommendation with a proposed timeline of 30/12/2025. The Department accepts this finding and recommendation.