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Submission

New South Wales Irrigators' Council

IPART Draft Report – Review of prices for the Water Administration Ministerial Corporation

July 2025

Contents

1. What are your views on the proposed 3-year determination length?

NSWIC supports the three-year determination period to undertake a wholesale review of WAMC's operating model, budget and performance.

While WAMC budgets continue to increase far beyond IPART's allowed expenditure targets, IPART still maintains that licensing fees should be gradually raised in order to achieve full cost recovery.

These two trends of increasing budgets and an insistence on an incremental pathway to full-cost recovery are leading to unsustainable price rises. NSWIC asks that this period is used alongside the WaterNSW review to overhaul rural water pricing in NSW with lasting solutions to affordability and sustainable water management.

Three-year determination period

This three-year period is a valuable opportunity to review and restructure the rural water pricing model for WAMC (alongside WaterNSW). NSWIC believes that this review should be overseen by the shareholding Ministers (the Treasurer and Minister for Finance) and led by an independent consultant such as Seftons and involve relevant bodies including WaterNSW, WAMC, the MDBA/BRC (NSW component), NRAR, NSW-DCCEEW, the NRC and state and valley-based peak bodies.

We view the rural water pricing model as fundamentally broken and not capable of being permanently fixed unless its core assumptions and cost structure are overhauled. This is not possible within the current framework and for this reason, NSWIC asks that this review is led by the shareholding Ministers.

While we understand some of the cost drivers and circumstances facing WaterNSW are not identical to WAMC, there is considerable overlap in functions and cost drivers. We believe that all options should be on the cards for this review, including:

- Determining whether WAMC's corporate model is fit-for-purpose and capable of providing affordable service delivery for rural water users.
- Deciding if the current cost share arrangements between water users, WAMC and WaterNSW are fair.
- Re-examining the 'impactor pays' assumption used in pricing determinations.
- Scrutinising WAMC cost-recovery targets and efficiency of service delivery.
- Ensuring that IPART decisions safeguard the long-term viability of the irrigation sector and food security in NSW.

This process should not just tinker around the edges of the current model but should be an extensive review that develops a new approach to rural water pricing. It is clear that we are reaching a crossroads where issues of affordability cannot be ignored any longer. This three-year period should not be wasted, as it is a clear opportunity to find lasting solutions to the existing pricing model.

2. How reasonable is it to assume the forecast water take from floodplain harvesting will be 30% of the floodplain harvesting entitlements?

NSWIC believes that this 30% figure is likely to be fairly accurate, though there will be differences between specific valleys. Based on feedback from NSWIC's Northern Basin members, 30% is seen as a reasonable estimate, although if anything, slightly too optimistic, as most landholders felt they would, on average, access below 30% (depending on geographical location on the floodplain). However, this was based on a small sample size and each irrigator has unique circumstances affecting their ability to access floodplain harvesting. NSWIC has not conducted its own rigorous research and does not have data on hand to confirm these anecdotal numbers.

Some factors that may influence floodplain harvesting take are on-farm dam storage capacity, rules surrounding other forms of water access (supplementary, etc.) and timing of rainfall. One barrier to taking a full allocation of floodplain harvesting water is dam capacity, which will vary between farms. This will also be affected by previous weather patterns – for example, if a floodplain harvesting event happens after a period of heavy rain, irrigators may already have filled up dam storages with rainfall runoff or supplementary water. If this is the case, they may not be able to take a full allocation (depending on the size of their dams). Conversely, if it happens immediately after a dry period, they will have more capacity to fill up storages.

In other valleys, like the Namoi, restrictive rules are in place for supplementary water take, meaning irrigators have a stronger incentive to take maximise floodplain take.[1] In other valleys where supplementary access is more generous, there is higher availability of other forms of water, and potentially less need to take a full floodplain harvesting allocation. Additionally, if adopted, policy changes arising from the independent connectivity expert panel review may reduce supplementary access, which may lead to similar dynamics in the Namoi occurring in other valleys.

We are supportive of IPART's decision to charge floodplain harvesting licences on a 100% variable rate, given that this form of take is opportunistic and will require little oversight once fully operational.

NSWIC also asks that irrigators are not paying extra for the inefficient rollout of floodplain harvesting licensing and measurement. The floodplain harvesting reforms have been delayed by staff and hardware shortages, as well as problems with incomplete or inaccurate modelling. While we appreciate the novelty of these reforms and the challenges that presents, we do not wish for more of the WAMC's costs to be passed onto licence holders in future pricing determinations.

[1] Namoi irrigators can only take 10% of supplementary water between 1 July-31 December and also had each supplementary water share reduced from 1ML to .37ML

3. Do the 2.5% and 5% caps on prices strike the right balance between cost recovery and impacts on customers?

NSWIC is pleased that IPART rejected WAMC's proposed 15% price rise for small, medium and large licence holders. On this basis, while we disagree with the some of assumptions built into WAMC pricing model, a 5% increase may be regarded by some water users as a reprieve.

However, we do not support the new two-tiered pricing model proposed by WAMC, in which very small licence holders pay only a 2.5% increase while the rest are charged 5%. This creates a precedent in which WAMC can seek ever higher percentage rates of price increases imposed on the latter group on the grounds of WAMC's dubious claim this group can afford it better.

On top of this, we do not believe IPART should be determining further price increases before an exhaustive review to determine WAMC's efficient cost of business, whether the WAMC structure is fit-for-purpose to drive efficiency, and the relevance of the impactor-pays principle in determining cost-sharing.

We believe that the 82% cost recovery target is incompatible with a productive irrigation industry and cannot be justified given the ever-increasing WAMC budgets and changing nature of community expectations around water management. We appreciate that IPART has signalled that it is open to a review of its pricing model; NSWIC and its members expect to play a central role in this process.

Cost recovery

NSWIC supports some degree of cost recovery, but does not agree with IPART's use of the impactor-pays principle that apportions most of the cost of WAMC's functions onto licence holders. This principle is the driving force behind IPART's insistence that WAMC should transition towards 82% user cost recovery and is ultimately leading to constant price hikes, regardless of WAMC's performance, efficiency, scope of programs or water users' capacity to pay.

Under the current pricing determination, irrigators will contribute 43% of WAMC's budget but even at this lower figure, 5% annual price hikes are already putting a strain on farm budgets. By IPART's logic, water licensing fees should be nearly double what they are now for licence holders to contribute 82% of funding (assuming WAMC budgets don't increase).[2] Given that WAMC's proposed 15% price hikes were deemed unaffordable, licence fees nearly doubling over the next 13 years would push many irrigators beyond breaking point.

Under its current model, IPART takes it as a given that 82% cost recovery must be achieved, regardless of circumstances or consequences. NSWIC believes that under

[2] We note that Treasury has granted DCCEEW $92.6 million in its 2025-26 budget, well above the $72.7 million that IPART deemed as efficient expenditure in its draft determination.

the current approach, annual increases of at least 5% will be baked in with little scrutiny on the overall assumptions behind 82% cost recovery and no clear understanding of the long-term implications. As part of this review, this figure needs to be re-assessed to ensure that it represents a fair cost share.

NSWIC believes that 82% cost recovery goes beyond what is required to receive efficient water management and services (as is defined under IPART's terms of reference). WAMC's budget also incorporates climate change planning, compliance and enforcement via NRAR, supports environmental flows, and Aboriginal water programs, among other things. These activities are public goods and as such, should be funded by the taxpayer, rather than falling primarily on the shoulders of water licence holders. It is essential that these cost recovery goals and assumptions are scrutinised before the next determination period.

Impacts on customers

IPART has acknowledged in its paper that affordability was a major concern for licence holders in the WaterNSW and WAMC pricing reviews. The initial 15% proposed price rises by WAMC for all but the smallest water users were both exorbitant and insufficiently justified. In the short term, most irrigators would accept a 5% rise, but this three-year review needs to be used to find a lasting solution, rather than continuing the commitment to full cost recovery, year-on-year price hikes, and uneven cost-shares - regardless of WAMC's proposals.

Striking the right balance

In order to find the right balance, IPART needs to abandon its insistence that WAMC move towards full cost recovery, re-think the current cost sharing arrangements and undertake a serious review of water management costs in NSW.[3] On one side, there is an insistence that full cost recovery is achieved, and on the other side, escalating budgets for WAMC beyond IPART-allowed expenditure. With each determination, water fees seem to grow, service levels decline and irrigated farming becomes less viable.

Escalating WAMC budgets

NSWIC members feel that they should only pay for the costs associated with baseline service delivery but are being constantly lumped with new charges for programs that often benefit the wider public. We understand that as a vital natural resource, water has stringent regulations attached to it and that the public demands a high level of accountability on its management. These community expectations have led to the

[3] Encompassing WAMC, WaterNSW, NSW-DCCEEW, NRAR, the NRC, and MDBA/BRC

creation of the Murray-Darling Basin Authority (MDBA), NRAR, the NRC, and a range of government legislation, regulation, programs and planning delivered by state and federal governments.

This is leading to cost blowouts, as WAMC has gone over its allowed operating budget by 45.2% to 134.5% between 2021 and 2025.[4] Some cost drivers are noted as 'increased water planning', 'compliance and enforcement' and its need to comply with the *Water Management Act 2000*. Major reforms such as non-urban metering, floodplain harvesting and the creation of NRAR have likewise increased WAMC's budget. NSWIC does not see that these were created solely for irrigators, but instead driven by changing public expectations around natural resource management.

The goal of cost recovery is not possible under the current paradigm, as budgets continue to grow with endless new work programs and environmental goals. Either full cost recovery is abandoned, or WAMC budgets are trimmed significantly. If NSW deems these WAMC programs as essential, these should be funded via Treasury. As part of the three-year review, there needs to be serious scrutiny of how water charges can be affordable while WAMC delivers its core functions.

Coastal issues

These price hikes will be strongly felt by coastal members, who typically received the highest cumulative percentage increases. None of the documents provided by WAMC, WaterNSW or IPART had an affordability analysis done for coastal users, and we see that most coastal users have little capacity to absorb price increases. This is demonstrated by the WaterNSW community service obligation (CSO) that supports regulated river customers on the North and South Coast. We do not believe that full cost recovery is possible in coastal regions and this target should also be re-assessed before the next pricing determination.

Coastal users have also echoed similar concerns to inland members, that service delivery is not improving and that even basic infrastructure like river gauges are poorly maintained. Coastal regions have also been particularly affected by recent floods, with extensive loss of stock, fencing and equipment. This means that meters may have been washed away or become faulty, which again requires more resources to fix (compounded by a lack of duly qualified persons to restore meters).

NSWIC recommend that costs associated with the non-urban metering reform not be passed on to customers until all metering compliance barriers have been addressed. We ask that government covers for the cost of metering reform until coastal compliance metering reform deadlines have passed, the mandatory metering conditions is applied to all water supply works approvals in NSW, the Independent

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[4] IPART: Review of prices for the Water Administration Ministerial Corporation from 1 October 2025 to 30 June 2028, Draft Report, pp. 49

Telemetry Review is completed with recommendations implemented, and metering review recommendations are implemented.

Fees for changes to works approvals are also prohibitive for many coastal users who often have small water entitlements and farming operations. These costs are not commensurate with the scale of coastal irrigators' budgets, and many are hindering the efficient use of water. For example, users pay $1,013.37 just to inactivate a Water Supply Work Approval. We appreciate that most of these costs have remained at current levels, but that doesn't mean they are affordable and should also be scrutinised in the review process.

4. What are your views on a potential alternative cap of prices for water management services at 10%?

NSWIC does not support raising the price cap to 10%. As we have made clear, we do not support the premise that WAMC prices should be increased year-on-year under the current cost-share model. We have outlined in this submission that we do not view the goal of 82% cost recovery as either fair or realistic and believe that this needs to be lowered before the next pricing determination.

It is clear from the volume of submissions that IPART received to its draft pricing determination that WaterNSW and WAMC price hikes could threaten the viability of many farming operations. Given the blowback against the 15% rises requested by WAMC in late-2024, 10% annual increases would also be a serious concern for licence holders. IPART recognised that "prices at even the proposed capped rate, with inflation could have substantial impacts on some customers".[5]

IPART also needs to consider the impacts of these price rises in a broader context. WaterNSW fees were also set to increase, input costs like fertilisers and energy continue to rise, water markets have tightened due to Commonwealth buybacks and farmers face chaotic weather patterns across the state. Given this environment, there would be staunch opposition if the 10% figure was pursued.

5. What are your views on our proposed performance metrics? Could these be improved?

NSWIC supports the drive to improve accountability and measure WAMC's performance. Many NSWIC members feel that service delivery has not been improving, despite fees constantly rising. We are also concerned that WAMC consistently goes over budget with few repercussions and feel that this needs to be scrutinised. We believe that the four proposed outcomes represent a reasonable starting point for measuring performance.

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[5] Ibid, pp. 37

We believe that there should also be some mechanisms put in place to ensure that roles are not duplicated between State and Commonwealth DCCEEW, the NRC or the MDBA. Some examples include NSW-DCCEEW setting aside money for long-term annual average extraction limit (LTAAEL) reviews, despite the fact that the MDBA already undertakes widespread monitoring of sustainable levels of take through the SDLs.[6] NSW-DCCEEW also must review 58 WSPs multiple times: once by the NRC, then provide a DCCEEW response, then the final development by NSW-DCCEEW. These were noted by DCCEEW as a cost driver and this process could easily be streamlined, simplified and improved.[7] This is especially relevant as DCCEEW notes that modelling personnel are in short supply.[8] The three-year review could allow for these processes to be improved.

NSWIC and its members are also concerned that WAMC has little incentive to exercise Budget restraint or drive efficiency. Treasury routinely ignores IPART's determinations on WAMC's efficient cost of business, for example with ~$40 million more handed down than WAMC proposed to IPART in 2025-26 Budget on 24 June 2025. We expect Treasury to support IPART by imposing expenditure discipline on WAMC, or else what is the point of IPART and stakeholders going through the price determination process?

6. What are your views on a potential price structure review?

NSWIC has been vocal in its desire to see a review of the WAMC structure. This and previous submissions have made it clear that prices are increasing faster than users' capacity to pay and this threatens the viability of irrigated agriculture in NSW. We do not see that lasting solutions to water pricing are possible within the current framework and believe all options should be considered in the coming three years.

NSWIC's proposed review

As outlined earlier, NSWIC believes that shareholding Ministers should take the lead on the WAMC and WaterNSW's pricing reviews, as we believe enduring solutions to water pricing are not possible in the current structures. All options should be on the table for this evaluation and at its core, it needs to find a balance that both supports the viability of irrigation in NSW and ensures environmental sustainability and public confidence in water management.

This review should be overseen by an independent consultant such as Seftons and include all relevant government bodies (NSW-DCCEEW, WaterNSW, WAMC, MDBA/BRC (NSW component), NRC, etc.) and peak-bodies (state and valley level).

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[6] Stantec, Expenditure review of Water Administration Ministerial Corporation, pp. 64
[7] Ibid, pp. 65
[8] Ibid, pp. 64

A number of issues need to be addressed and sufficient time must be allowed to work through them, so we believe work should begin immediately.

Impactor pays

NSWIC does not agree with a cost-share model predicated on the impactor-pays principle. We see that many of the primary WAMC functions are driven by public expectations around water management and planning. While these regulations may be expected by the community, they are not central to the running of an efficient business where "customers pay no more than needed"[9] and the impacts of water use are already managed through various mechanisms, like the SDLs, metering, and mandatory water take reporting. We believe that affordability issues will not be comprehensively addressed until this principle is abandoned.

Arguments against the impactor-pays principle can be found in a number of NSWIC documents.[10] We believe that its counterfactual arguments are misplaced and that changing community expectations around water management are driving the need for increased regulations (not just the needs of irrigators). This in turn leads to a lopsided cost-sharing arrangement, where licence holders pay on average 82% of WAMC's costs – often funding programs that provide significant public benefit.

The impactor-pays principle is not consistent with many other public goods in NSW. For example, public transport in NSW typically generates around 25% cost recovery from fees, with the rest subsidised by the government.[11] This is because public transport produces public benefits like reduced traffic, pollution and provides equity (in delivering affordable mobility).

We believe that under the current model, IPART does not properly consider the public benefit provided by WAMC's functions. WAMC charges cover climate change management and adaptation, environmental modelling of rivers, compliance with water laws, water quality monitoring and regulatory planning. These have immense public benefit, through improved biodiversity, water quality, climate change preparedness, and help improve public confidence in natural resource management. In turn, this benefits tourism, cultural outcomes, [12] recreation, and improves disaster management.

The assumption that irrigators are the primary impactors also ignores the original purpose of dam construction and inland development – that is, developing downstream areas for food and fibre production to shore up food and water security

[9] IPART: Review of prices for the Water Administration Ministerial Corporation from 1 October 2025 to 30 June 2028, Draft Report, pp. 25

[10] See IPART Issues Paper: WAMC and WaterNSW pricing proposals, December 2024, NSWIC August 2024 Pricing Report, NSWIC Response to Draft Operating Licence for WaterNSW, IPART Online Submission October 2023

[11] IPART: Maximum Opal Fares, 2020-2024

[12] Aboriginal outcomes or preserving nationally significant flora and fauna, for example

for the nation. This was an important part of nation building process and has provided tangible benefits to the public, keeping rivers running during drought, providing agricultural output and town water supply. It also gave the public a reliable supply of locally produced food and fibre.

We believe that the public benefit of environmental management and food security should be considered in IPART's pricing determination. This would lead to a fairer cost share and can be easily justified to the public, under the argument of environmental preservation and local resilience in food production. Finally, we view the counterfactual of a "world without consumptive water use" as an unrealistic stating point. Given the need for water to sustain all human populations through food and drinking water, a world without consumptive water use is an inconceivable scenario and should not be the basis of IPART's assumptions.

Cost-recovery targets

Opposition to the cost recovery targets has been outlined in previous sections of this submission. We again stress that IPART's 82% cost recovery target is unfair and unachievable without damaging the irrigation sector in NSW. If the proposed 15% per annum price hikes were deemed unaffordable, then we believe the ultimate cost recovery goal should be abandoned given at a minimum, water fees could need to double annually over the next thirteen years. This would be untenable – especially considering the similar rises in WaterNSW fees for regulated customers.

Role of NRAR

NSWIC supports compliance and enforcement of rules and regulations. We welcome any intervention that increases public trust in water management and value the importance of independent monitoring of water take. However, users still must be sure that they are getting value for money under the current compliance arrangements and that the increased costs are sufficiently justified.

Compliance rates and justification for budget increases

For one, NRAR's own statistics show that compliance is very high amongst water users – with an annual average of 375 enforcements taken per year across the 39,000 licences in NSW[13]. This represents a compliance rate of above 99%. We do not agree Stantec's assessment that there is a "lack of strong compliance culture among water users", based on 70% of the community believing that water theft continues.

[13] NRAR states that it monitors 39,000 licences while the 375 figure is from the 2024 WAMC pricing proposal, where NRAR outlines that it took 1500 enforcement actions over the previous five year period (pp. 50)

This ignores the strong compliance figures outlined earlier and we believe community perception is a crude metric to adopt – it is simply a binary response to a question but says nothing about the scale of perceived water theft.[14] We also believe that through its media releases and publications, NRAR perpetuates the community misperception by emphasising the actions taken without context, which leads to the perception that water theft is still widespread (despite statistics to the contrary).[15]

Water users also effectively pay double for compliance, as they pay for metering infrastructure, telemetry and reporting costs (on top of the charges that support water planning via WAMC and the MDBA). NSWIC is supportive of these measures, but there needs to be some consideration given to cost-effective and efficient compliance costs. Duplication of roles has been a major concern among members and this is but one example.[16]

Finally, a large part of NRAR's budget is dedicated to education and customer engagement, justified by the surveys that show that NSW has the most complicated water regulations in the country.[17] Stantec notes that it "would expect that a significant proportion of this cost would not be required in a well-functioning and mature water management environment, where licence conditions were easy for users to understand and for NRAR to enforce."[18] Effectively, users are paying the Government to educate them on complicated regulations created by the Government.

Efficiency of NRAR's budgets

As noted by IPART, NRAR's should be able to "transition from its current establishment phase to a maintenance role that utilises targeted and risk-based approaches requiring fewer resources".[19] NSWIC believes that given the high compliance rate, and improvements in monitoring via telemetry and metering, efficiency is an important goal.

Costs of compliance should be commensurate with expected infringements and NSWIC wants to be sure that the public are getting value for money in compliance activities. Likewise, users should not be subsidising NRAR to explain complex water

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[14] For example, water theft is still technically occurring, even if this is at low rates. There is no nuance in this response and a more appropriate poll would have allowed people to allocate perceptions on the scale of water theft.

[15] For example, in this media release 'Spring-summer compliance data shows fines issued up almost 70%' the headline implies low compliance, while the article ends with "a lot of people are already doing the right thing, and we are encouraged by that" and "the number of breaches is small compared to the 39,000 licences monitored by NRAR"

[16] Stantec also notes the Regional Water Strategies as being "a duplication of effort as other mechanisms are in place to gather this formation for water sharing plans"

[17] Or at least, the least well understood by users

[18] Stantec, Expenditure review of Water Administration Ministerial Corporation, pp. 267

[19] IPART: Review of prices for the Water Administration Ministerial Corporation from 1 October 2025 to 30 June 2028, Draft Report, pp. 53

regulations to users – this should be addressed by the MDBA and NSW and Commonwealth DCCEEW (who design the rules).

NSWIC also questions whether the IPART 2024-25 pricing determination process for WAMC has been rendered irrelevant when Treasury has already $56.2 million to NRAR in the NSW Budget handed down on 24 June. This is 54.8% higher than the $36.3 million proposed in WAMC's pricing proposal and that IPART deemed to be an efficient cost in its draft determination released in early June.

We ask that IPART investigate the justification for this substantial increase in funding and also believes it raises issues around IPART's determination process. This is particularly important, given the 100% cost share allocated to water users.

Public benefit of NRAR

There is also considerable public benefit to NRAR's work which is not captured in the current cost -shares. NRAR helps ensure water use remains within sustainable limits which means that environmental or cultural benefits can be enjoyed by the wider public. NRAR therefore exists not just for industry regulation, but for the community at-large. The 100% cost share has been adopted by IPART.[20] This arrangement seems to ignore the significant public good component of NRAR's work.

Lack of efficiency gains in WAMC services

NSWIC believes WAMC needs to demonstrate far greater efficiency, as despite hopes that new regulations would lower budgets, in most instances our members have seen the opposite. This is most apparent in compliance, where despite the large-scale investments, there has been no associated decrease in oversight or compliance costs.

The non-urban metering rollout introduced stringent standards on water users including independent installation of meters and telemetry for larger water users. In theory, this should allow for more cost-effective monitoring of take, as tamper-proof meters feed water take data to the WaterNSW system in real time.

There have been issues in the metering rollout, as noted by IPART in its draft determination, and we are still yet to see any improvements in monitoring. This is well captured by the statistic that "80% of metered entitlement incurs only 15% of projected costs under the existing framework.[21] Spending 85% of the metering budget to pursue 20% of entitlements is not a sound use of resources.

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[20] NSWIC could not find any reference to changes in the cost share arrangements for W08-03, so we have assumed that it has remained at 100% user share goal that was outlined in the IPART Information Paper (pp. 32)

[21] IPART, Review of prices for the Water Administration Ministerial Corporation from 1 October 2025 to 30 June, 2028, Draft Report, pp. 130

As IPART notes "given the shift in compliance focus to higher-risk users, who account for the majority of water take but a smaller share of projected costs, we would expect a reduction in the efficient cost of the scheme. However, WAMC proposed a 1.4% increase in average annual costs for the 2025–30 period compared to 2023–24 allowances."[22]

Stantec gave similar commentary in its Expenditure Review noting a lack of risk tolerance and an unwillingness to adopt "less than perfect" solutions even when these would be more practical. It states that WAMC "has not consistently and robustly considered the trade-offs between service level, cost and risk in proposing its expenditure review" and that they did not adopt "less than perfect" solutions when consequences might be minor.[23]

Policy planning verses policy implementation

NSWIC also believes that many of the programs being run by WAMC fall under policy planning and should have a 0% user share, as was determined by Stantec for activity W06-05. It is difficult to make a clear assessment on particular programs, as these and the relevant cost shares are not clearly laid out in the IPART draft determination, although some programs are named within certain categories.

Among the policy planning programs are the minimum inflows review, connectivity review, regional water strategies, the coastal sustainable extraction project and NRC water sharing plan (WSP) reviews.[24] We see that these programs are clear examples of policy planning, rather than policy implementation that water users might arguably pay for in part.

Additionally, all new policies and changes to regulations require significant investments in policy planning. NSWIC is unclear on how these costs are shared between users as there was no clear rationale or cost breakdown for each activity proposed by WAMC. We would appreciate some clarity on this issue from IPART, as the IPART draft determination states that some aspects of policy planning might be user-funded, according to NWI principles, but others not.

Water sharing plans are likewise a large component WAMC's work, that are currently funded 70% through licence fees. These reviews are long processes that involve numerous stages of analysis, factoring in environmental, social, economic and cultural outcomes. Much of this work is unrelated to the needs of irrigators yet is largely funded by licensing fees. We again believe that it falls under planning and that its current cost share cannot be justified.

NSWIC believes that this distinction will need to be carefully looked at, as there appears to be considerable grey area in the definitions of policy planning versus

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[22] Ibid, pp. 130
[23] Stantec, Expenditure review of Water Administration Ministerial Corporation, pp. 19
[24] Connectivity appears to have an 80% user share (W05-03)

policy implementation. Stantec has understood policy planning as "broad strategies for managing water" and policy implementation is "catchment scale" or "localised water plans". In our view, many current programs now encompass many issues beyond catchment-scale issues and we believe that the user-share should reflect this.[25] This needs to be addressed during the three-year review.

[25] For example, the 2024 NRC review of the Murrumbidgee includes Aboriginal water ownership, town water supply and climate change planning