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The Hon Troy Grant

Inspector-General of Water Compliance

[igwc@agriculture.gov.au](mailto:igwc@agriculture.gov.au)

21 April 2023

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Subject: Submission on the Inspector-General of Water Compliance's Regulatory Policy Discussion Paper

Dear Inspector-General of Water Compliance,

Thank you for the invitation to provide a submission on your Regulatory Policy Discussion Paper. I welcome the consultative approach you have taken with this paper to inform your Regulatory Policy and your aim to improve public understanding of your role within broader water governance and institutional arrangements applying in the Murray-Darling Basin.

I acknowledge the statutory independence of the Inspector-General and the constructive relationship you and your office have with our Natural Resources Access Regulator (NRAR).

The scope and application of the principles set out on page 6 could be clarified. With regards to application of Principles 1 and 4, you may wish to consider (and detail in your policy) how to reconcile a situation where Basin-wide outcomes were identified as being different to national outcomes. Principle 3 would be improved by articulating why a general focus on water extraction trends over time is important and to what end e.g. to ensure there is no illegal take and there is compliance with sustainable diversion limits.

I welcome clarification in your Regulatory Policy on how your role interfaces with other Commonwealth agencies, in particular the Murray-Darling Basin Authority and the National Water Commission once established, and how consistent advice and approaches can be provided across the Commonwealth with respect to Basin states and their management of Basin water resources.

I suggest that where there is a difference of opinion between Commonwealth agencies, that this is highlighted but it is acknowledged that the State is working through the matter in an agreed way with the Commonwealth. This approach will not only provide confidence to stakeholders that matters are being dealt with in a collaborative and transparent way but will ensure that trust is not undermined when a State is acting in a way that is consistent with the advice provided by one Commonwealth agency.

It would be beneficial for a diagram to be produced to show how the unique role of the Inspector-General fits into broader water governance and how it interacts with other Commonwealth and state water management agencies. A point of reference for the development of this product could be the following which has been produced to provide

information on the local, state and federal agencies involved in managing water in NSW:  
<https://www.dpie.nsw.gov.au/water/about-us/how-water-is-managed/whos-who-in-nsw-water-management>

I would be happy to discuss any of the matters raised in this submission, should that be of assistance to you.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Mitchell Isaacs', with a stylized, cursive script.

Mitchell Isaacs

NSW Basin Officials Committee member