

## RESPONSE TO RECOMMENDATIONS

IGWC Audit of *Controls Supporting Compliance with Basin Plan Requirements*

## Commonwealth Environmental Water Holder

The following table outlines the Commonwealth Environmental Water Holder's (the CEWH's) response to the recommendations of the audit into Controls Supporting Compliance with Basin Plan Requirements conducted by the Inspector General of Water Compliance, for the sale process of Commonwealth environmental water allocation in the Goulburn in January 2023

Area	IGWC audit recommendation	CEWH response
<b>Policy and procedural framework</b>	There is an opportunity to strengthen the CEWH's policy and procedural framework and training regime by: <ul style="list-style-type: none"> <li>- clearly outlining that SPIRE gives effect to its information barrier arrangements and how staff must comply with its information barrier arrangements; and</li> <li>- outlining the range of events that could constitute a water announcement by referring to section 12.49 (3) of the Basin Plan.</li> </ul>	<p>The CEWH accepts this recommendation.</p> <p>The CEWH will review the policy and procedural framework with respect to outlining record keeping arrangements in SPIRE and how this functions as an information barrier. The framework will also be revised to outline the range of events that could constitute a water announcement by referring to section 12.49 (3) of the Basin Plan.</p>
<b>Training</b>	There is an opportunity to improve training through clearly outlining: that information barrier arrangements are given effect through SPIRE; and referring to section 12.49 (3) in policy documents.	<p>The CEWH accepts this recommendation.</p> <p>The CEWH will update training content to include record keeping arrangements in SPIRE and how this functions as an information barrier. The training content will also be revised to outline events that could constitute a water announcement by referring to section 12.49 (3) of the Basin Plan.</p>
<b>Information barrier arrangements</b>	The office of the CEWH should periodically review access controls and audit access logs to have assurance over the effectiveness of its information barrier arrangements.	<p>The CEWH accepts this recommendation.</p> <p>Staff access to relevant SPIRE folders will be periodically reviewed to ensure effectiveness of the information barrier arrangements. This requirement will be outlined in the CEWH's procedural framework.</p>

Area	IGWC audit recommendation	CEWH response
<b>Managing conflicts of interest</b>	[The office of the CEWH] should seek independence declarations from external consultants engaged to support its water trading activities.	The CEWH accepts this recommendation.  When procuring advice from external consultants engaged to support water trading activities, the CEWH will obtain and record individual Conflict of Interest declarations from each consultant. This requirement will be outlined in the CEWH's procedural framework.