

Dear Commissioner,

I welcome the opportunity to make a submission to the **National Water Reform 2026 – Urban and Regional Water Services Interim Update**.

I have enclosed my paper, *Tracking Environmental Change – The Need for Environmental Information*, which proposes a practical framework to improve the management of environmental information used to regulate water and atmospheric pollution.

The proposed framework is based on two complementary registries: an **Indicator Registry** and a **Program Registry**. Together, these provide the contextual information required to transform environmental measurements into meaningful environmental information. By combining information from these registries with monitoring data, it becomes possible to identify failures to monitor, gaps in datasets, potential breaches of regulatory requirements, and long-term environmental change.

The framework could provide the foundation for a national knowledge framework for sharing environmental information and water data. It would allow users to identify where monitoring programs exist, what parameters have been measured, the period over which data has been collected, and where gaps in monitoring occur. By harmonising information from different organisations into a standard exchange format with a common set of parameters, the framework would improve interoperability while allowing organisations to continue managing data within their existing environmental information systems.

The effectiveness of water management, including the application of artificial intelligence, depends upon the availability of well-structured, standardised environmental information. The proposed framework provides the structure needed to improve data sharing, strengthen regulatory oversight, and support more informed environmental decision-making.

Regards,

Celia