

Submitted on Thursday, November 15, 2018 - 04:13

DETAILS

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Sector: Agriculture

NATIVE VEGETATION CLEARING

1 . Would a strategic approach to clearing, through a strategic purpose permit, benefit you?

Response: no
Comments:

2. Is the 'purpose component' reasonable to apply considering the added complexity of assessing this type of clearing permit?

Response: no
Comments:

3. Is the proposed fee structure fair and does it adequately reflect differences in the financial capacity of clearing permit applicants?

Response: unsure
Comments:

4. What is the likely impact on your business or industry of the proposed clearing fee structure?

Comments:
NA

5. Additional comments regarding Native Vegetation Clearing not addressed in the questions above.

Comments:
NA

WATER

6. Do you consider it reasonable for taxpayers to pay 100 per cent of the cost of assessing water licence and permit applications and if so, why?

Response: no

Comments:

The introduction of licensing fees does not consider:

- the economic value of horticulture, in this case grape growing and the additional economic contribution that wine production, sales and tourism has;
- the capacity for us as growers to pay;
- the inequity resulting from the fact that no charges are being considered for unlicensed bores and dams for livestock production, hobby farms and suburban households;
- how to more efficiently and effectively manage water resources *7. If water licence and permit assessment fees were introduced, what do you consider to be an appropriate fee for a water licence or permit application?*

Comments:

A basic administrative fee should only apply - up to \$100.00 *8. Would you consider a risk-based model for determining water licence and permit application fees to be appropriate? If not, what basis could the department use to structure fees?*

Response: no

Comments:

Again the proposed fee is not based upon actual water usage, and it is not clear how the fee level will be calculated.

9. What would be the likely impact on your business or industry if water licence and permit fees were introduced?

Comments:

Introduction of such a fee will have an impact on us as a small business. We are already overburdened with red tape and numerous licensing and other fees associated with our Industry, from both a Federal and State perspective. At the same time much of the burden to administer, manage, and comply with all these various licenses or permits is placed increasingly on the business owner. This takes us away from focusing on core business.

10. If water licence and permit assessment fees were introduced, how could the collection of fees be timed to better support your business or industry? For example, would you benefit from paying fees up front, at the end of a licence assessment or annualised over the term of the licence?

Response: unsure

Comments

11 . Additional comments regarding Water licences and permits not addressed in the questions above.

Comments:

We note that in the Economic Regulation Authority's Inquiry into reform of business licensing in

Western Australia it is stated, that, "Licensing to manage the State's water resources provides another example. Discussions on reforming water regulation in Western Australia have been happening since 1994; however, the Government is yet to draft new water resource management legislation. The delay means the State is administering an outdated water licensing scheme. Processing times for water licence renewals and amendments are about 30 per cent longer than necessary."

We strongly urge the state government to abandon these proposed cost recovery charges and focus instead on developing modern water management legislation that will support Western Australian wine grape growers, the horticultural industry and the wider State economy