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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:

Priority Agricultural lands should be maximised to produce food. Independent Government planning instruments have identified "Priority Agriculture" as an area where a strategic plan to land clearing would be used. We believe this not to be in the best interests for future food production.

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

Response: no

Comments:

These increased costs are not justified as the complexity is Government generated with more complexity around requirements for clearing and more people sitting in seats that are paid for by taxpayers funds. There is no ability to pay the extra funds without farmers putting more pressure on their land holdings to generate more production and generate more income to pay for these increases.

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

Response: no

Comments:

The EPA have introduced the complexity to the application process. The landholder should not be expected to cover the cost of Government created red tape. As these regulations are supposed to be for

the "benefit" of the community then the community should pay, not the landholder who already will bear the cost of the clearing to generate food production.

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

Comments:

As previously stated the only way farmers generate more income is by producing more litres of milk, more eggs, more kgs of meat etc. The more regulation and fees attached to the production the more unsustainable farming becomes.

The Government is therefore making farmers clear more land to increase their production to pay for costs such as this *5. Additional comments regarding Native Vegetation Clearing not addressed in the questions above.*

Comments:

Already farmers do a fantastic job in preserving and protecting land and waterways. Self supply irrigators are already subsidising government research by paying for and collecting and analysing water at surface level and in bores at various levels. They read meters, write reports for Government or pay consultants to collate and report this info back to Government. Farmers fence off remnant vegetation and creeklines for environmental protection which produces a community benefit at no cost to the community. Land clearing costs should be simplified on freehold land and if Government want to impose extra red tape then they need to pay for the cost of implementation at farm level and Government level.

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:

Water licence fees should be set at an appropriate level such as a car license fee. Self supply irrigators are already subsidising government research by paying for and collecting and analysing water at surface level and in bores at various levels. They read meters, write reports for Government and pay consultants to collate and report this info back to Government. The self supplier has already borne the brunt of construction of bores, pipes, irrigators, proven the water source and paid for compliance reports for Government agencies. The Government has done little to contribute to any of this so why should a water user pay such a drastic fee?

WA's ag production will be stifled by these onerous costs and many will go out of irrigation.

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 fee similar to a drivers licence fee would be fair. Fees for a Driver's Licence are a tested benchmark for Government service, being \$89.15 for a New Applicant Fee and \$149.50 for Licence Renewal for five years. These benchmark fees could be applied to water licensing. The government could put this level of fees for water licensing transparently at the next State Election. That would be fair. Water users invest substantial time and money to complete hydrogeological studies to satisfy the DWER that environmental risks associated with water extraction are acceptable prior to the issue of an extraction license (5c). Once this process is complete the subsequent issue or renewal of an extraction license (5c) is straight forward and should require a similar amount of administrative effort as issuing a drivers license. In addition, water users are required to provide substantial data on water quality and yield at their own cost, which DWER uses for its own purposes. In reality, the current arrangement is a very good deal for DWER.

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:

No. As discussed in response to question 2, a risk based model is not appropriate to determine water licence and permit application fees as water users are already demonstrating acceptable risk at their own cost. Fees for a Driver's Licence are a tested benchmark for Government service and a similar fee structure is appropriate for water licensing.

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

Comments:

Many rural irrigators are struggling due to market volatility, capital requirements and the increasingly high operating costs of this sector. Water license and permit fees would reduce the small profit margins that many businesses generates. It would result in unnecessary financial strain on the business owners to satisfy increased Government red tape.

*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: upfront

Comments

An appropriate up front licence fee with amount comparable to drivers license fees outlined in response to question 2, would suit.

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

Comments:

Addendum - supplementary discussion relevant to the submission.

Further to the direct response to DWER's questions, note that similar unfair water licence fees were attempted by a Labor Government in 2007 and 2008 were disallowed by the Legislative Council. Our reasons now for disallowance include:

1. Mark McGowan promised in the 2017 Election campaign there would be no new taxes on West

Australians (ABCTV, 21 February 2017).

2. The proposed licence fees are grossly disproportionate to services provided. Renewal of a water licence is usually a 'rubber stamping'

process. A \$6,668 renewal fee is excessive. The fee is more than the cost for service delivery.

3. Family based farmers using less than 50 megalitres of water to produce food and wine will pay the same \$6,668 licence renewal fee as the Ord Irrigation Cooperative licenced to use 246,300 megalitres from the Ord River.

This is unfair.

5. Self supply irrigators have invested their own funds to establish their self-supply water dams and bores and it seems unfair that the Government is suggesting a fee for use of them.

6. None of the water allocation plans in WA are statutory Water Resources Management Plans provided for in the Rights in Water and Irrigation Act (Division 3D - Plans for management of water resources).

Thus, related water licences don't provide security of water access for food and wine producers.

7. We don't know what the 11 year pending Water Resources Management Bill contains that may

increase the 'red tape' and costs for self-supply water users. Will it extend licensing to run-off and spring-fed dams, and water intercepted by tree plantations?

8. There is an opportunity for the Minister for Water to appoint a Water Resources Council for WA and local Water Resources Management Committees to enable peak and local stakeholder input to water resource planning and management, and any fees. Why is this process not being undertaken?

9. Is the same cost recovery option being looked for urban bore-water users?

If not, why are rural landholders being targeted?