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Cost recovery responses
Department of Water and Environmental Regulation

[Redacted]

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fees@dwer.wa.gov.au

Dear Sir/Madam

Response to Discussion Paper on cost recovery for the Department of Water and Environmental Regulation

As a self-supply water user for the purpose of growing wine grapes, I am absolutely opposed to the introduction of any cost recovery for self-supply water licenses and native vegetation clearing.

The proposed fees are unfair and will have a severe impact on the hundreds of small businesses and their employees who underpin the industry.

The introduction of licensing fees does not consider:

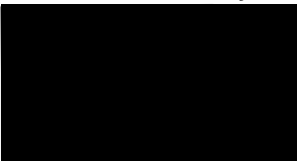
- a) the economic value of the horticultural industry to WA;
- b) the capacity for growers to pay, given financial margins in horticulture are low and there is no capacity to pass the cost onto the consumer;
- c) the inequity resulting from the fact that no charges are being considered for unlicensed bores and dams for livestock production, hobby farms and suburban households;
- d) the poor status of the current level of service provided by the Department of Water and Environmental Regulation (DWER);
- e) growers' current contributions towards commercial hydrological surveys and meter monitoring;
- f) fee level calculation is not transparent;
- g) how to more efficiently and effectively manage water resources.

I note 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 The delay means the State is administering an outdated water licensing scheme.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.”

I 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.

Yours sincerely



Tom Hill

Operations Manager

JUNIPER
MARGARET RIVER

