

Cost recovery responses
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COST RECOVERY *DISCUSSION PAPER*: SUBMISSION ON RENEWAL OF WATER LICENCE

We are a self-supply water user in agriculture and are opposed to the introduction of the proposed fees of \$6,668 for renewal of a water licence and \$8,929 for a new water licence. We encourage disallowance by the Legislative Council of the enabling regulations for these high fees. Our reasons for disallowance include:

1. Mark McGowan promised in the 2017 Election campaign there would be no new taxes on West Australians. This proposed new fee is a tax on agriculture.
2. The proposed licence fees are grossly disproportionate to services provided. Renewal of a water licence is usually a 'rubber stamping' process. The fee is more than the cost for service delivery and thus is a tax.
3. 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 does not seem equitable.
4. We have paid for our self-supply water dams and bores and it is objectionable that the Government is demanding thousands of dollars for us to use them.
5. 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.
6. 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.
7. The State Government has not appointed 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. The Minister for Water and Department ignore these provisions of the *Water Agencies (Powers) Act* and the *Rights in Water and Irrigation Act*. This is a denial of procedural fairness on matters that affect farmers using self-supply water.
8. The Labor Government has no consistency on who pays the licence fee. It ignores the 177,000 garden bores in Perth using 88,000 megalitres of water. This is an unacceptable city electoral bias.

We are not averse to paying a water licence fee but it must be fair and transparent.

Yours sincerely

Stephen Kirby



Brookland Valley Estate