

Submitted on Thursday, November 15, 2018 - 08:24

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:

Have not been briefed on the difference between Purpose permit and Area Permit so don't understand the difference between the Two permit types charts on the Discussion Paper. Very Low consultation on item.

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

Response: no

Comments:

- Flawed consultation Process
DWER can't organize themselves to send out info. They depend on peak bodies to inform levy payer of peak bodies. Computer Registrations unable to process as meeting Cancelled 3 day prior to meeting being held. Reason stated due to lack of # registering. No one will attend if not Notified.

Consultation Clearing Permits put at busiest time of year for Farmers. Harvest (wonder if this isn't intentional???)

Meetings put in middle of day to suit DWER, Exactly when we need to be working. Wheat harvest happens during the Dry part of the Day. We are not paid while at meetings and cant cost recover.

The Aging Farming population doesn't do well with computer registrations and submissions even if they are sent them.

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

Response: no

Comments:

For agriculture and Horticulture and Forestry it is such a huge increase in

cost to even apply. If you were looking at starting up a new Venture that

required you to Clear land, , develop bores, Meter bores, provide headwords, pay for water application

fees, --Cost prohibitive to small operations. -- These Charges favor large corporate Farmers and puts

boutique cottage industry's at risk.

is Detrimental to Developing innovate Ideas especially someone trying something different. "having a go". Ie Wine industry Margaret River 25+

years ago, Truffles, Olives, Carab, Flowers, Fish farming, Marron, just to name a few.

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

Comments:

The cost recovery methodology appears wrong to me. with your pie (PiPE) Chart in Cost Recovery "Consultation "

it states where the effort goes. "Clearing Permit applications by industry"

174 State development

116 Local Government

115 other Development {private}

60 Agriculture/Horticulture/Forestry

33 basic Raw Materials

18 Utilities

So if i read this correctly $174+116+18 = 308$ applications of 516 total applications or 60% of total cost

recovery will be from One government department to another Government Department. So my local

country shire will get Hit KKKK\$\$\$\$\$ to apply for a clearing permits or purpose permits for country

roads and such, which in turn will be put onto my rates bill to pay for this ridiculous cost recovery

exercise.

***** We are not making the wheel go forward here but backwards.*****

(I take it that Utilities is Water Corp, Synergy ect. GOV DEPTS.)

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

Comments:

I believe that native vegetation is advantages to everyone and not just the person who wants to clear it.

IE Tourist enjoy the beauty and supply income

for many industries such as hotels, flights, food, also benefit. Why have

you not tried to cost recover from these industries. City people do venture

out and enjoy the great outdoors also , Just as we taxpayers from the

country subsidies benefits in Perth that run at a loss ie -buses, trains, sporting venues, Our City cousins should also pay for Government Services that run at a loss in the country.

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: yes

Comments:

The state DWER budget papers state that the average cost of assessing a low risk Licence water 2017/18 estimated Actual was \$1791.00 if this is the case Why do you want to charge Low risk new applications 5357.00 and renewal of licences at low risk 4001.00 surly all the back grounding has been done and it is just a rubber stamp. Or should I say a postage Stamp for Invoice, or are we to mysteriously find that on the website as well.
facts from State Budget Page 556

According to the budget paper the online processing approval system Automatically Defaulted to put licence applications in the low risk Category. How likely is it that when paying these accounts will we atomically be put in the High risk category? Computer error or Otherwise? Page 556 *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:

None acceptable

INFRASTRUCTURE COSTS and Risk Factors

We have put in all our infrastructure, We took the risk 25+ years Ago and have put substantial Capital into developing our water infrastructure, Paying for hydro surveys, cost of boring 5 bore holes to find water, getting head work electricity to bore holes, all pumps, tanks, repairs and Maintenance, paying for and fitting DWER meters, even Providing provisions for using Saline water by attaching Hydro smart. -all these cost and risks have been paid for by us.

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:

None Acceptable

We are Serving the Industry by providing the DWER info regarding pumping

volumes, salinity and other information to monitor the resource. We do not charge for this effort (ie no cost recovery for licence holder's efforts) but must pay to put Meters on and do the reports and surveys. How much does it cost DWER to put down their own monitoring bore and Monitor it. \$\$\$\$\$\$ What Services does DWER offer us? How does this improve your DWERS KPIS? We have had licences for approximately 18 years and have had two visits from Staff in that 18 years. Once around 2012 (3 Staff) When we fitted bore meters and secondly in Sept 2018(2 staff) If the fees are to increase their KPI then why do we have 3 people on a visit? Cost of 6668,00 to renew a licence is not Realistic. Since when does throwing money at a under performing entity increase KPI?

Water Efficiency

Our water is slightly Saline which causes us a 10 percent reduction in Yield (Documented Fact}. Is there any provision for the reduction in yield in cost consideration? Our bores are only 30mtrs deep in a superficially water source. Is there any consideration that we are not taking it out of deep sources? Next stop for our water you would assume is the ocean.

We spend extra money each year in the delivery of water using it under mulch and putting it thru t-tape to diminish evaporation and loss of water. Is there any consideration for best use practice? (Instead of sprinkler or centre pivots). *9. What would be the likely impact on your business or industry if water licence and permit fees were introduced?*

Comments:

Water Licence Fees

At this stage we have not been told which risk area we would fall in so I will imagine we are going to fall in the High risk area to quote figures. We have 2 Licences so effectively we would pay 13,336.00 I have been told, that amendments such as, minor changes in Name and address details would need to pay the amendment fee if initiated by Licence Holder to paid on top of the renewal fee and to run till the end of licence period. If we retire/die and need to change the name of the water licence to a son, we would have to pay another \$7,345. So effectively we could be paying 20,000+ in a 10 year period.

The cost of Compliance for Growing melons is becoming overly prohibitive from MRL (minimum Residual Levels) every month cost \$400.00 each time. Three environmental Swabs per Month on Packing equipment cost 200.00 each time, Wash water Testing Equipment \$K and Testing time Extra Employees \$\$, Sedex

(Ethical Treatment of Employees), Fresh care Audit, Haccap accreditation, Harps Audit, Just to sell into Igas, coles, woolies and Aldie.

This is a Family Business which employees local country People. Cost of running this business is at a point where it is not profitable. Compliance issues from having a human rights policy posted to foot operated sinks is beyond a joke. I cannot cost recover, I have a perishable product, I cant grow other products as we have salty water. and you think we have another 20k to pay to the government.

I believe we should not pay any fees as we have developed and proven the water source at our own cost and have not had any government money to do the infrastructure to enable us to grow melons.

On top of this if fees were introduced the business is going to become basically nonviable with all the compliance in the industry since cggmmv, salmonella and listeria outbreaks. Basically we cannot afford any addition costs.

i Havent even began to talk about the cost of production increases from fuel, electricity, Freight, commission, seed, fertilizer over the years and still we effectively get paid very close to what we were paid 20+ years ago for a tray of Melons. GO FIGURE!!

We have initiated all efficiencies that we can and cant cost recover.

Next stop we stop growing.

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

*****None acceptable *****I am not unsure but would not let me submit unless I tick a box *****

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

Comments:

Will the Cost Recovery Money address the department's inefficacy? I don't think so.

I find it unreasonable that the Department hasn't sent any direct communication regarding Fees for Water licences to the existing licence holders to Date and expect every one to email them submissions electronically on a response form they have devised which is skewed with leading questions.

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