

Submitted on Thursday, November 15, 2018 - 05:19

DETAILS

Company: [REDACTED]
First name: Pippa
Last name: Nielsen
Address: [REDACTED]
Suburb: [REDACTED]
State: [REDACTED]
Postcode: [REDACTED]
Phone: [REDACTED]
Email: [REDACTED]
Sector: Agriculture

NATIVE VEGETATION CLEARING

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

Response: unsure

Comments:

NA

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

Response: unsure

Comments:

NA

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

Response: unsure

Comments:

NA

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 the horticultural industry to WA.
- the capacity for growers to pay, give financial margins in horticulture are low and there is no capacity to pass the cost onto the consumer.
- 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,
- poor status of current level of service provided by the DWER.
- fee level calculation is not transparent
- 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:

You are proposing what is basically an administrative cost. It does not reflect the usage of water or how it or what it will be used for. The fee structure if similar to the Mining and Public Water supply as referenced does not appear to take this into account.

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:

Not based upon the model being proposed.

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

Comments:

The proposed fees are unfair and will have a severe impact on the many small business operations that underpin our industry. The fees proposed are not in proportion to the revenue generated by viticulture. We would rather see a focus instead on developing modern water management legislation that will support Western Australian wine grape growers, the horticultural industry and the wider State economy.

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

Ultimately we don't believe the fees should be introduced.

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

Comments:

We 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."

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.