

From: Andrew Ogden <[REDACTED]>
Sent: Thursday, 15 November 2018 5:27 PM
To: Fees
Subject: Cost recovery discussion

Apologies for this somewhat brief response:

- 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?

No – while the water is a state asset, only some are able to make use of it. Management of the resource should be a state responsibility; however licensing its use should be charged to the user.

- 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?

26D licence: unconfined aquifer (class 1 driller) say \$300 - \$500; confined aquifer (class 2 or 3 driller) say \$2000 - \$5000.

5C licence: base on notional volumetric charge as well as risk – a more complicated but fairer risk matrix must be developed than that supplied in discussion paper.

- 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?

Use a matrix which addresses both risk and volumetric allocation.

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

As a small landowner, irrigating pasture for stock and taking water for domestic use in the Banjup area (not serviced by scheme water), if the level of fees for renewing a 5C licence is the same as for mining and public water supply this would be ridiculously high.

If the area was fully allocated, then the risk-based matrix would put my licence renewal (GWL64923; 10700kL; Success subarea of the Jandakot Groundwater area) on the same fee basis as that of Water Corp for their Jandakot shallow aquifer allocation (GWL59421; 1,075,000kL; Success subarea of the Jandakot Groundwater area).

- 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?

Charging 26D licence fees annually over the term of the licence would be a sensible approach – both to spread the outlay over the period, and also to get license holders used to paying a regular fee rather than objecting to one large fee every 10 years or so.

Regards,
Andrew Ogden