

Submitted on Tuesday, October 30, 2018 - 05:49

DETAILS

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Sector: Local Government

NATIVE VEGETATION CLEARING

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

Response: yes

Comments:

Yes as long as the process is streamlined and no transfer of self compliance being made and/or put upon the applicant than currently being experienced by the applicant.

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

Response: unsure

Comments:

Purpose Permit should have been to the forefront of any application being dealt with however in this instance - the proposal is key yet specific therefore a greater emphasis on "purpose permit" needs to be well and truly defined.

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

Response: no

Comments:

The proposed Fee Structure is currently unfair as it dramatically increases fees and charges beyond belief and beyond inflation and is not necessary in our current economic climate. Everyone is advised to pull their weight and to suggest the new proposed fees structure is not fair and equitable to our community. This aspect needs to be carefully considered and recommended for gradual increase in line with community and business expectations. The proposed increases should not be totally on cost

recovery in one hit as the department will find itself paying for more in its operation as a Trading Enterprise.

Financial capacity of Clearing permits by the Applicant is to try and develop and/or more particularly protect its interests / asset from danger and from destruction, a ten fold plus increase in fees is not the answer.

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

Comments:

Operating costs will go up that is the bottom line PLUS considerations to retail pricing and employment costs will be factored into the cost efficiency of being in business. The Clearing permits need to be kept in a simple processing mode and not complicated by the savage increase in fees and charges.

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

Comments:

The Department must streamline its application process as it is the Department that will receive a cost benefit no-one else if all current responsibilities remain in place. If the Department passes on any Cost shifting and an increase Administrative burden upon the applicant at the expense of the applicant to achieve cost recovery, then the Department needs to reduce its costs. WE cannot have our "cake" and "eat it" as well.

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:

Taxpayers are paying the Department to deliver a service - it seems ridiculous to savagely increase application costs when you could argue that all we are doing is double dipping. Cost reflectivity goes two ways and the main party needs to show it is smarter in its processes and not shift the problem to the applicant when the applicant is already in deep with red tape and its associated costs to feed the Department.

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:

Water License should perhaps be around 50% of the permit assessment fee.

*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:

Risk based model is only used if anything is a risk. If the department and if the Applicant complete their background checks to a proposal where is the risk - why do we have to have another tier of red tape and introduce risk based assessments. Then the Department has not completed its due diligence and have not provided a "risk free" advice - so why should there be a risk???

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

Comments:

residential, retail and/or commercial areas do not need another permit and/or licence - the red tape and self compliance currently being experienced is already at a high. Our business is currently running at a slightly better than cost break even !! Any further burdens will not see us continue in our small business enterprise - it is just too bloody hard !!!

*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

Do not support the introduction of a water licence and/or permit.

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

Comments:

We must not savagely increase any fee and/or charge to achieve our cost neutral target - otherwise chasing this will increase the cost of the Department in its push to continue making profits as a Trading Enterprise - then the exemptions will no longer exist and full cost recovery to the community will become real.

The Department has spent time and energy to come up with a streamlined process - moderate increases in fees and charges is the norm but to use a full cost recovery model and/or compare to Eastern States departments then we will decrease our capacity for business to be introduced into our community and for us to grow our business community with continual costs increase that can push anyone over the "fine line" without hesitation.