

Submitted on Wednesday, November 14, 2018 - 05:02

-----  
DETAILS  
-----

Company: [REDACTED]  
First name: Lisa  
Last name: Tana  
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:

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

Response: unsure  
Comments:

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

Response: unsure  
Comments:

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

Comments:  
Unsure

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

Comments:  
n/a

-----  
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:

This YES is in relation to agriculture, i have no comment on other industries

Increasing costs in agriculture, particularly horticulture, is an ongoing issue with the grower unable to pass on costs to its customers as growers are price takers. If costs are continually needed to be absorbed than at some point it becomes uneconomical to continue to grow in Australia. When that happens then Australia will be importing produce rather than producing what it should be able to produce itself.

\*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:

I do not believe 100% cost should be passed onto growers. The produce grown by West Australian growers benefits the whole of the state in that WA does not need to import as much produce from the other states or any from overseas. This results in fresher, better quality fruit and vegetables being available to the WA public. WA growers are providing a service to the WA population. Pushing the costs to growers will only increase the growers cost of production with out the ability to increase its pricing to customers which then reduces the profitability of the grower.

\*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: unsure

Comments:

I understand that the more fully allocated or the higher volume of water requested increases the complexity of the assessment however the fees proposed should be subsidized for the horticulture industry for the reasons stated above. Our industry operates on high volume of sales with a very low profit margin. Any increases in cost impact of the viability of our businesses.

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

Comments:

These fees would need to be absorbed by our business thereby reducing our profitability. This is because we have little to no ability to pass on costs by increasing prices. Unfortunately for us the price of carrots has not increased for decades so our only option would be to absorb it.

\*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: annual

Comments

Given that our licences are for 10 years having it upfront would be prohibitive. Whilst we do not want any fees it would need to be annually.

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

Comments:

If the fees are introduced is there transparency on the cost recovery. I would think that if this cost recovery was introduced then like all businesses efficiencies and productive gains would / should be targeted.

Would any of these savings be passed on to the licence holders?

Whilst you might say that it is a cost of business which is true, we have been operating our farms for some 20+ years. We face costs every year to use water from infrastructure costs to collecting monitoring data to reporting on data, now we also need to pay for the licence which is not a cost that we have envisaged or budgeted for. These fees really leave us with no option if implemented but to pay them given the many millions of dollars that we as growers have invested in our business which is of significant benefit to the WA public.