

Submitted on Thursday, November 15, 2018 - 01:17

DETAILS

Company: [REDACTED]
First name: Ianto
Last name: Ward
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State: WA
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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:

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

Response: no
Comments:

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

Response: no
Comments:

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

Comments:
This increase in cost would have a significant impact on the profitability of our business where profit margins are already very tight. We have little ability to pass these costs onto our consumers and would need to absorb the cost ourselves.

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

Comments:

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:

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:

\$100 to \$200 per year

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:

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

Comments:

We are self-supply water users in agriculture opposed to the introduction of fees of \$6,668 for renewal of a water licence and \$8,929 for a new water licence.

We have several water licences and this increase in cost would have a significant impact on the profitability of our business where profit margins are already very tight.

We have little ability to pass these costs onto our consumers and would need to absorb the cost ourselves.

*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

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

Comments:

As a self-supply water user for the purpose of growing wine grapes, I am absolutely opposed to the introduction of any cost recovery for self-supply water licenses and native vegetation clearing.

The proposed fees are unfair and will have a severe impact on the hundreds of Mum and Dad business owners who underpin the industry.

The introduction of licensing fees does not consider:

- a) the economic value of the horticultural industry to WA;
- b) the capacity for growers to pay, given financial margins in horticulture are low and there is no capacity to pass the cost onto the consumer;
- c) 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;
- d) the poor status of the current level of service provided by the Department of Water and Environmental Regulation (DWER);
- e) growers' current contributions towards commercial hydrological surveys and meter monitoring;
- f) fee level calculation is not transparent;
- g) how to more efficiently and effectively manage water resources.

I 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."

I 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.



15 November 2018

Cost recovery responses
Department of Water and Environmental Regulation

fees@dwer.wa.gov.au

Dear Sir/Madam

Response to Discussion Paper on cost recovery for the Department of Water and Environmental Regulation

As a self-supply water user for the purpose of growing wine grapes, I am absolutely opposed to the introduction of any cost recovery for self-supply water licenses and native vegetation clearing.

The proposed fees are unfair and will have a severe impact on the hundreds small business and their employees who underpin the industry.

The introduction of licensing fees does not consider:

- a) the economic value of the horticultural industry to WA;
- b) the capacity for growers to pay, given financial margins in horticulture are low and there is no capacity to pass the cost onto the consumer;
- c) 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;
- d) the poor status of the current level of service provided by the Department of Water and Environmental Regulation (DWER);
- e) growers' current contributions towards commercial hydrological surveys and meter monitoring;
- f) fee level calculation is not transparent;
- g) how to more efficiently and effectively manage water resources.

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I 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.

Yours sincerely

Ianto Ward

Viticultural Manager

JUNIPER
MARGARET RIVER

