

Submitted on Wednesday, November 14, 2018 - 04:01

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DETAILS  
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Sector: Agriculture

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NATIVE VEGETATION CLEARING  
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\*1 . Would a strategic approach to clearing, through a strategic purpose permit, benefit you?\*

Response: no

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.

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

Response: no

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.

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

Response: no

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.

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

Comments:

We don't have plans to do any clearing, however as our profit margin is extremely tight, and sometimes

in the negative, any extra licensing fees will negatively impact our business to the point where we may have to close down because the banks will only prop us up for as long as they make a profit.

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

Comments:

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WATER

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\*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 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; If we are to be paying the full cost, how do we know the Public Servants are not fudging their time allocations, or what ever you consider to be costs.
- g) how to more efficiently and effectively manage water resources.
- h) I also believe the Water Authority should take into consideration the considerable capital cost of building water storage dams, bores, tanks, pump houses, irrigation, water treatment plants etc. for which many of us use Bank Loans/Bills that we try to pay off over decades, and then the large maintenance cost of our own water supply systems.
- I) As the Water Authority, does nothing but monitor our impact on the environment and water resources, and does not have infrastructure to supply water, approximately \$6,668 pa is an astronomical amount for us to pay for a license.
- j) When our business commenced in the late 1990's there was minimal, if any tourism in this region. If our business and others in the region like us, close down, the tourism industry of the South West

Geographe region will be immediately impacted. Running our Cellar Door brings tourists, but the benefits v costs are minimal for us, especially since the State Government stopped the State Liquor Rebate in June 2015. If we are forced to sell our business, it is highly likely the buyers will be from overseas. They will not care about WA tourism, nor the local economy. And I doubt they will give free tasting samples to tourists.

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.  
\*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:

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.

\*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:

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

Comments:

As it is already extremely difficult to run at a profit, we are already considering how to restructure our

business, if we are to be able to survive.

Any extra costs, especially, such licenses from the WA Government, may be the 'straw that breaks the camels back'. We have so many licenses, levies, rules and regulations already to pay for and abide by, that any additional burden may become impossible to carry.

\*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

I am absolutely opposed to the introduction of any cost recovery for self-supply water licenses and native vegetation clearing.

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

Comments:

I am absolutely opposed to the introduction of any cost recovery for self-supply water licenses and native vegetation clearing.

The Government can not do a better job of water supply, than we are already doing for ourselves. If the Water Authority believes they can, they need to show the small business owners, who are the backbone of this State, how they can improve on what we already do, before charging a new 'willy-nilly license fee'.