

Submitted on Thursday, November 15, 2018 - 07:04

DETAILS

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Sector: Agriculture

NATIVE VEGETATION CLEARING

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

Response: yes

Comments:

My own opinion is that clearing should be restricted as much as possible. It certainly should only be allowed for "strategic" purposes of significant state benefit --- *2. Is the 'purpose component' reasonable to apply considering the added complexity of assessing this type of clearing permit?*

Response: unsure

Comments:

Maybe adding complexity - but need some way of restricting clearing *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:

None

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

Comments:

Make it simple, fair but firm

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:

* Licence holders could be expected to pay an administration fee - but that would be minimal

* Any reference to "100% of cost" begs the question of how efficient the department is in relation to this specific task

* What does this mean? ie "100 % of cost of assessing" From the departmental budget the cost of services in this area looks more like \$2m Are you attributing all costs across the department? Are you attributing investigation and research? The latter should be a cost to the state for asset protection on behalf of all citizens *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:

For agriculture \$200 (one off)

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: yes

Comments:

Yes - but not necessarily as you have framed it

* Water volume - agree this should be taken into account

* Allocation status of water resource - I question the use of this. What does it imply? If the resource is fully allocated, yes it might need more monitoring, but if it is properly regulated then the actual risk should not be higher than elsewhere.

* The risk you haven't included is an assessment of actual risks - environmental and pollution risks from associated fertilisers (eg) This might be more relevant. (though maybe more work and more costly).

Soil type might be a relevant inclusion *9. What would be the likely impact on your business or industry if water licence and permit fees were introduced?*

Comments:

* Many horticulturalists are very very concerned about this, some with justification.

* Small businesses cannot carry the cost of large licence fees, especially if the cost is just about administration. There needs to be more transparency / explanation of what the fees are meant to cover. Many people cannot comprehend that the cost of licensing could more than a simple administrative transaction

* There may well be political backlash if the introduction of fees is not handled appropriately (ie with modest impost) *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

Upfront fee plus a much smaller annual fee - then annualised over the cost of the licence, but with the opportunity to pay several years at a time with a discount
11 . Additional comments regarding Water licences and permits not addressed in the questions above.

Comments:

The discussion paper was confusing and has caused much consternation in "agriculture land"

In particular it was unclear why the tables referred to mining and local government but the words

"agriculture" "horticulture" or "other uses" do not feature. It was very unclear whether the paper was

relevant (currently or in the near future) to agriculture or not.

Even phone calls to DWER, and allied professionals, failed to get a straight answer about this.

I am concerned that the paper has not been direct enough in relation to future intentions with

agriculture. I realise you are trying to "test the water" (no pun intended), but I am still critical of the

wording. People like me, who are familiar with government policy development, should not have been confused.