LLS Rating submission

Changes to the Rate collection base and system are required to accommodate the LLS Authority’s expanded but centralised range of services and functions. Concurrently, this will contribute financial benefits to an identified, efficiency dividend with all contributors, big or small, the eligible beneficiaries.

- Include an across the board, structured, comprehensive but fair and equitable Environmental Levy (EL) (component), one that effectively and clearly reflects a justifiable allocation and proportional responsibility for all ratepayers. As direct and indirect beneficiaries, they will have access to information or advice and expect the protection of the services to be provided. Every backyard or small block can have or has a chook pen, may be a pig, a pony, sheep, cow, fruit trees or aquaculture ponds that can potentially host or harbor a bio security risk.
- Given that the majority of Noxious Weeds are Garden Escapees, an all inclusive EL component collected could supplement Federal and State funding. It could fill part of the $ short fall gap between the current Noxious Weed Control grants and the currently unfunded noxious weed control that should be, but isn’t, undertaken on public land. These could be locally identified and priorities with objective justification. As a minimum outcome, these additional funds would provide momentum, ensuring that appropriate levels of LLS are delivered locally.
- Utilise existing Local Government (LG) capabilities and capacity to deliver measurable financial benefits. Avoid duplicating bureaucracy, bypass the former LHPA’s administrative rates collection system model. Nothing will be gained by establishing a new administrative structure in its place to undertake the function.
- Subcontract the collection process through the existing LG mandate.
- LG is regularly audited, transparent and accountable.
- The new LLS “rating function” could be facilitated and delivered, relatively seamlessly, through a revised but as required, an all inclusive LHPA style rating formula. (The one IPART is yet to finalise) All components, (including the new ones, once formulated) could be itemised with a brief explanation and forwarded with the regular LG “Annual Fees and Charges” Notices. This includes but is not limited to:-
  - An expanded Agricultural Advisory Service and a Bio Security component
  - The pest animals formerly covered by LHPA for feral pigs, foxes & wild dogs, rabbits etc. Plus:
  - Insect species and bio security issues previously covered by LHPA and DPI staff in a cooperative partnership
  - To supplement the former CMA funded projects, an Environmental Levy (EL) is essential to support complementary Natural Resource Management activities, including monitoring and reporting on management outcomes, the culling of other pest and invasive animals, birds or weed species. Periodically, their presence on both public and private lands will require attention.

In the absence of another broadly accepted methodology and base, the existing LHPA rating system, embracing “an estimated or a nominal carrying capacity,” is the one to continue with. However, in light of increased bio security implications and complexities, a detailed Risk Assessment and Risk Management study is essential. Identify, measure and quantify new or potential threats that may originate from greatly expanded urban areas with their lifestyle blocks, the extended and changed broad acre farming activities, other intensive farming operations, aquaculture and horticulture, enterprises. These all represent significant changes in output from the historical grazing land use position of the original Pastures Protection Board Act and Regulations. The study may identify a need to collect and redistribute resources differently, to cover group specific, bio securities issues resulting from current land use for agricultural enterprise activities.
This proposed alternate model off-loads an unpopular function onto LG. That is the task of collecting the new basket of, yet to be determined, fees and charges for LLS (inclusive of the corresponding former LHPA rates) with Noxious Weed inspections and the current compliance obligations.

Make no mistake and unpopular as all this may be, pragmatically, no other entity is positioned more appropriately than LG is to administer and deliver the service.

The way is clear:

- Rationalise and dispose of surplus land and assets. There are many considerations, including settling legitimate Land Claims on former TSR’s, or Enclosed Land that may contain “community owned assets,” natural resource or areas identified as being of “High Conservation Value.” (HCV) Claims must be justified in an accompanying viable Business Management Plan, with an identifiable asset/ income stream, able to meet annual maintenance.
- Through locally identified initiatives, monitor and maintain a community’s wellbeing and amenity by supporting specific environmental or natural resource management projects.
- Locally, help to provide supervision of Public Land and Natural resource management to a reasonable standard for those not previously eligible to access other funding sources. eg Invasive pest species and weeds not declared as Noxious but identified locally as topically significant in a Key Threatening Process.
- Any aspirational services required or provided must reflect significant value, with benefits identifiable with strategic state and national policy standards.

The incoming LLS authority must be aware that LG and the former LHPA have been expected to achieve more with less. To rectify the situation, expand the rating base considerably and capitalise on this opportunity, with a significant attempt to bridge the funding gap.

This submission does not convey policy or represent the official position of any organisation or other individual. This is my opinion only, but is supported by drawing on 40 + years of observations and experience in many aspects of rural and agricultural activities, including pest management and biosecurity issues. The considerations are concurrent, with an eye on the broader implications of the incoming LLS, the possible future direction and role of NSW LG, with some redefined boundaries anticipated. A thorough transparent review into the efficacy of current efforts in weed control is needed with the objectively identified short comings debated and addressed.

Regards
Peter Scott

Should IPART deem it appropriate or require it, I am prepared to contribute further clarification to this submission.