

To whom it may concern,

I strongly object to the removal of the exemption for oyster leases. Please consider the following reasons:

The first reason given for removing exemptions is because (1) the exemption does not provide sufficient public benefits for the local community. The NSW oyster industry does not currently operate with a total exemption from payment of council rates and other fees and charges. I rent land base from NSW Crown land and pay rates. For the rates paid we do not receive garbage collection and have to pay tipping fees. Oyster growers' reliance on local council services is confined to services on the land base rather than the oyster aquaculture leases. There is no council road access to oyster leases, I do not use the boat ramp, there are no garbage collection services and no oyster infrastructure or waste products can be taken to land based recycling centers. I suggest boating industry pay for use of boat ramp like other states and if an oyster farmer uses the boat ramp then they contribute.

The first reason given for removing exemptions is (2) commercial activity is being carried out on the land providing the land owner with the capacity to pay rates. The use of the land already comes at a government cost similar to rates, we have to pay leasing fees to NSW Department of Industry. Council are the biggest polluters of the Crookhaven and Shoalhaven River through sewerage discharge, inadequately managed urban runoff and flood gates. This pollution has triggered the need for a quality assurance program that every farmer must contribute in accordance with NSW Food Authority Legislation. Our river alone cost \$140 000 last year and one of our areas has been closed permanently due to poor water quality. Should oyster growers be required to pay local council rates on leases, it is likely that the industry and growers would require a considerably higher degree of accountability for the impact on the environment and an improvement or additional services from local councils.

The third reason (3) the use of the land is contributing to substantial extra costs for the council. I believe that use of oyster farms does not cause council extra costs and in fact NSW oyster industry assists local councils in managing and monitoring estuarine water quality and in managing foreshore areas. Farmers in Crookhaven, willingly give time and labour apply for funding from NSW Government and Commonwealth government for river bank restoration and environmental improvements to water quality. Farmers also volunteer their time and labour on the ground undertaking these projects. Oyster farmers are a watch dog of the river keeping an eye and maintaining the health of the river for the benefit of the general public.

The fourth reason (4) the land owner is receiving substantial private benefits from council services. Council do not provide services to oyster leases, at all. We are regulated by NSW Department of industry and pay our fees and charges to NSW Government. Council actually cost us money. Every time there is a sewerage spill we cannot sell an oyster for 21 days which has a huge impact on the regularity of the industry. In addition an oyster aquaculture lease does not give the lease holder exclusive possession over the lease area. Leaseholders are required to allow public access over their leases and give allow access to other fisherman to wild harvest the cockles and pipis from the bed of the oyster lease, who sell these at the Sydney fish market. I am curious how council plan to charge these fishermen who decimate the cockle and pipi populations on oysters leases and use council boat ramps?

Oyster farming in NSW is a cottage industry which provides employment for families and their employees in coastal towns of NSW. The industry is highly regulated and audited costing family businesses many thousands of dollars every year. Additional fees that add no value to family businesses are unjust, unfair and have the potential to force closures in an industry which is already heavily impacted by environmentally variable conditions. Valuing individual oyster aquaculture leases is complex because lease areas have very highly variable productive capacity. We hold 15 hectares of lease of which only a small amount is classified as direct harvest and export. The remainder of the leases grow juvenile oysters. Some leases cannot be used until they undergo a full renovation to environmentally sustainable infrastructure which is a massive cost to businesses. The administrative processes and systems required for the Department of Primary Industries to determine an equitable valuation of lease areas would far outweigh any additional revenue and the costs would invariably be passed on to oyster growers, again, with no additional services provided. Please leave the exemptions in place.

Regards
Angela Riepsamen