

October 6, 2016

IPART
NSW

REVIEW OF LOCAL GOVERNMENT RATING SYSTEM

We are an oyster farming business operating in the Shoalhaven Crookhaven estuary at Greenwell Point on the South coast of NSW.

Currently oyster aquaculture leases are exempt from Local Government Rates.


IPART suggest in the issues paper that oyster businesses have the capacity to pay rates and that it would be equitable to remove the current exemption.

We do not agree that this is the case.

There are a number of issues relating to rating oyster aquaculture leases that we believe are relevant to the review.

Oyster farmers already pay rates on land bases that support their on water aquaculture leases operations. This is where our business benefits from the services that council provides such as the supply of water and sewerage facilities, road access to our land bases; however we do not receive any garbage and waste services from council. We pay our own costs for waste management of our business. There are no services that council can provide to aquaculture oyster leases that warrant rating the leases.

If aquaculture leases are rated how would they be valued? In our business we view the leases as you would a paddock on a farm (however the only way to access that paddock/lease is via a punt on water). For example one lease this year may be suited to fattening of oysters and another lease may be suited to raising of spat stock, next year



neither lease may be suited for these purposes. Some of the other factors that affect the value of a lease are proximity to land bases, location of leases within various harvest zones status, species that can be grown on the lease, productivity of the lease, and most particularly the water quality at that lease.

Aquaculture leases are very strictly controlled by the Department of Primary Industries and the Department of National Parks and Wildlife. If an oyster farmer surrenders an aquaculture lease all infrastructures on that lease must be removed and the lease returned to its natural environment. Do these Departments then become responsible for the rates on that lease?

Oyster farmers already pay considerably to the Department of Primary Industry (including NSW Fisheries), NSW Food Authority, Roads and Maritime Services who all control the activities that can be conducted on the leases.

It is important also to recognize the environmental value that the oyster industry provides to the community. Oysters are a filter feeder and are extremely vulnerable to the quality of the water in the estuary in which they are grown and they are adversely affected by poor water quality. The monitoring of oysters for harvesting is the first indication that estuary may have pollution. Storm water and sewerage management, housing and industrial development are the responsibility of councils and directly impact water quality affecting oysters on the aquaculture leases.

As a business, we believe that we are already significantly contributing financially as well as environmentally to the community. We believe that the current system, that is aquaculture leases are exempt from rates, is the system most suitable for oyster's farmers and for our business

Yours Sincerely

Elizabeth Chris and Anthony Munn

KINGTIDE OYSTERS