

Review of the Funding Framework for Local Lands Services - Submission by the North Coast Livestock Health and Pest Authority

The North Coast Livestock Health and Pest Authority (NCLHPA) would like to make the following comments in relation to the recommendations outlined in the draft Review of the Funding Framework for the Local Land Services (LLS) NSW.

Recommendation 17

The NCLHPA does not fully support the reduction of the minimum rateable area to 2 hectares. The NCLHPA currently has approximately 20,000 ratepayers with a minimum rateable area of 10 hectares. This number of ratepayers would increase significantly for coastal areas if the minimum rateable area was reduced to 2 hectares. The previous Rural Land Protection Boards on the North Coast had minimum rateable areas of 4 and 6 hectares and it was very difficult to justify services to these ratepayers with limited staff numbers and other limiting factors such as distance restrictions for pest animal control. The recovery of outstanding rates was a huge task for RLPB staff.

Recommendation 18

The NCLHPA supports the retention of notional carrying capacity as a rating base rather than area based rating. NCC is a more equitable system as it compares productivity of the various holdings which can differ substantially on the coast. This view is also shared by the NSW Farmers Association and a large number of farmers however it is not supported by those with “lifestyle” blocks or horticultural ventures.

Recommendation 21

The NCLHPA supports removing the current exemption for rates for growers of sugar cane. These holding present a biosecurity risk and as such should be rateable. The justification for the original exemption is questionable.

Recommendation 22

The granting of exemptions or discounts of specific fees, rates, or levies for individual landholders should be supported by the LLS Act or associated regulations. Decisions by local LLS Boards to grant exemptions and discounts could be subjective and difficult to substantiate if legally challenged.

Recommendation 23

The penalty for failure to submit an Annual Return of Land and Stock should be a set amount for all ratepayers irrespective of whether they have livestock or not. This penalty should be supported by legislation. For years the only ratepayers really penalised for not submitting a return is those without stock (via the animal health levies). This has caused

must angst to these ratepayers as they see that they are supporting the livestock industry. The penalty should be charged to all with those with livestock still to be charged the animal health fees (this could be identified through the National Livestock Identification Scheme).

Other Issues

A couple of other issues that should be considered are:

- Neighbourhood Associations – these types of holdings are becoming more popular on the coast. It is where a subdivision is done with a lot of individual blocks sold to owners and a larger common area shared by all landowners. There is always debate over who is liable for rates in these cases. This matter should be clarified as part of this review.
- Submission of Annual Returns – Under the current legislation when a holding is sold in the second half of the year, the next year's rates are based on the information provided on the previous year's annual return (submitted by the previous owner). This is an anomaly as the information may change. The new owner can also be unfairly charged the animal health charges if the previous owner failed to submit an annual return. This anomaly should be corrected as part of this review.
- Voluntary Conservation Agreements (VCA) and Council Zonings – There has been many requests for exemption from rates for those areas under VCAs and various Local Government Area zonings and heritage listed sites. All of these areas pose a biosecurity risk with invasive animal and plant pests and as such the NCLHPA supports the continuation of these areas being rated.
- Specific Purpose Rates – The purpose of the Pest Insect Levy (for Locust outbreaks) should be expanded to include other pests such as Cattle Tick. Coastal ratepayers object strongly to paying this levy when locusts do not impact on their production.

Neil Summerville
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Per:

