

File Ref: E10.4139

C/- Eurobodalla Shire Council  
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18 December 2013

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Dr Peter Boxall AO  
Chairman  
Independent Pricing and Regulatory Tribunal of NSW  
P.O. Box Q290  
QVB POST OFFICE NSW 1230

Dear Dr Boxall

**Re: Review of the Funding Framework for Local Land Services**

On behalf of the members of the South East Regional Organisation of Councils (SEROC) I wish to respond to the proposal put forward by the Local Land Services Board of Chairs (LLS BoC) .

The following comments are put forward by SEROC for IPART's consideration

- i. The member Councils are strongly opposed to the proposal that LLS rates be applied to properties below 2 hectares.
- ii. Member Councils are also strongly opposed to the proposal that Councils take on the responsibility for the collection of LLS rates for this category. This task will place a significant financial and resource burden on Councils. Councils are concerned that as a consequence of providing this service for the LSS, Councils will by extension become debt collectors for outstanding LLS rates which is an unacceptable situation.

It is unlikely that most ratepayers are going to delineate between between Council rates and LSS rates and as such is likely to generate a perception that Councils are benefitting from the imposition of the LLS rates.

- iii. SEROC is strongly opposed to the imposition of LLS rates on public land. This seems to fly in the face of the convention that one level of government does not tax another level of government. Councils are not entitled to rate Crown land such as that which will be under the control LLSs, eg. Travelling Stock Reserves. Member Councils are concerned that this

removal of the rate exemption implies that Council roads, either as a source or recipient of weeds should be rateable land for the LLS.

The proposal also fails to recognise the significant investment Councils already make in the management of natural resources often in partnership with the former CMAs and through weeds management programs.

SEROC understands that the LLS BoC is seeking to achieve financial viability for the new Service, however, this should not be achieved by further cost shifting to local government.

Our members would welcome a further opportunity to raise our concerns with IPART.

Yours faithfully

Cr John Shaw  
Chair

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**South East Regional Organisation of Councils (SEROC)**

**Comprising the Councils of Bombala, Boorowa, Cooma-Monaro, Eurobodalla, Goulburn-Mulwaree, Harden, Palerang, Queanbeyan, Snowy River, Upper Lachlan, Yass Valley, Young and ACT Government**

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