



SPIRIT OF THE SNOWY MOUNTAINS

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Dr Peter J Boxall AO  
Chairman  
Independent Pricing and Regulatory Tribunal of NSW  
PO Box Q290  
QVB Post Office NSW 1230

20/12/2013

Dear Dr Boxall,

**Re: REVIEW OF FUNDING FRAMEWORK OF LOCAL LAND SERVICES NSW**

**Summary**

Snowy River Shire Council (SRSC) supports the development of the LLS and IPARTS draft framework for funding the LLS. LLS rating should be equitable, target risk creators and beneficiaries of LLS activities.

The BoC submission is largely problematic and SRSC opposes the majority of the submission. The BoC submission was late and should not be considered by IPART. SRSC strongly opposes the increased cost shifting and the burden of collecting rates and educating ratepayers on behalf of the LLS would create. Properties under 2ha should not be charged LLS rates since these properties do not receive LLS services and their primary biosecurity risk; Noxious Weeds is currently a Local Government responsibility.

**Responses to LLS recommendations**

- 1. The LLS BoC recommends a parallel rating system for intensive agriculture which would be accessed by a simple gateway question. "Is the enterprise engaged in intensive agriculture"? If YES, then a simple risk mitigation / revenue matrix would be applied based on the nature of the enterprise being conducted (as illustrated in Table 1).*

This recommendation is consistent with the principles of IPARTS draft framework and SRSC does not oppose its implementation.

- 2. LLS BoC recommends that all risk creators are subject to the LLS rate including land holdings below 2 ha (excluding commercial and industrial land).*

SRSC strongly opposes the inclusion of properties below 2 ha. The majority of properties below ha are less than 1000m<sup>2</sup> residential blocks and do not receive LLS services. The majority of the biosecurity risk created by the majority these properties is related to noxious weeds for which Local Government is responsible under the Noxious Weeds Act. The LLC should not collect rates on properties which pose a biosecurity risk outside of its responsibly.

SRSC strongly opposes collecting any rates on behalf of the LLS. The LLS should be fully accountable to the community for any and all rates it collects. The LHPA has demonstrated its ability to collect rates for the Food Authority and the DPI and does not require the assistance of Local Government.

Any education of ratepayers in relation to LLS activities should be conducted by the LLS. Education delivered by Local Government risks confusing ratepayers understanding of which agency is responsible for LLS activities, Local Government or the LLS.

3. *That all exemptions are removed.*

This recommendation is consistent with the principles of IPARTS draft framework and SRSC does not oppose its implementation.

4. That IPART ensures that the final framework is sufficiently flexible to allow for regional variations, while recognising that the process for setting rates by the Local Boards needs to be transparent and repeatable.


This recommendation is consistent with the principles of IPARTS draft framework and SRSC does not oppose its implementation.

5. That exemptions for public landholders are removed. That LLS engages in a process with these land managers to determine how they will manage their risk management obligation and contribution to LLS.

SRSC strongly opposes this recommendation. The ability of Local Government to deliver services to its ratepayers has been significantly eroded over time due to cost shifting from State Government. The LLS drawing rates from Local Government will increase cost shifting and further reduce the services Local Government can provide to rate payers.

Crown Land which is to be administered by the LLS poses a significant biosecurity risk due to the exemptions offered to public authorities under the Noxious Weeds Act. These exemptions should be removed so that the LLS can be held to the same standard of Noxious Weed control as private landholders and Local Government.

Yours sincerely



Joseph Vescio,  
General Manager, Snowy River Shire