



Government of **Western Australia**
Department of **Water and Environmental Regulation**

Consultation summary report

Discussion paper on cost recovery for clearing permit applications

Department of Water and Environmental Regulation

April 2019

Department of Water and Environmental Regulation
8 Davidson Terrace
Perth Western Australia 6027
Telephone +61 8 6364 7000
Facsimile +61 8 6364 7001
National Relay Service 13 36 77
www.dwer.wa.gov.au

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Executive summary

The Department of Water and Environmental Regulation undertook consultation with a range of stakeholders between August and November 2018 on the potential implementation of a cost recovery approach for the assessment of applications made under the *Rights in Water and Irrigation Act 1914* (RIWI Act) and for native vegetation clearing under Part V of the *Environmental Protection Act 1986* (EP Act).

This document provides a summary of key themes and comments on cost recovery relevant to clearing permit applications.

The *Discussion Paper on Cost Recovery for the Department of Water and Environmental Regulation - Supporting the Delivery of Improved Environmental and Water Regulation* (discussion paper) was released on 10 August 2018 for a 14-week submission period. The discussion paper outlined that contemporary regulation recognises the principle of user-pays and that proposed cost recovery will assist the department to meet the expectations of our customers, through the future funding of regulatory services to improve our performance and timeliness. The department also held seven information and workshop sessions to further inform stakeholders.

A total of 176 written submissions were received throughout the consultation process. Of these, 100 submissions were in part (94 submissions) or in full (6 submissions) related to cost recovery of clearing permit applications. Comments provided at the information and workshop sessions have also been considered in this document.

A total of 257 people attended the seven regional information and workshop sessions. Through the workshops the department collated comments that have been considered in this document.

While the majority of submissions supported the general principles of cost recovery and user-pays, support for the specific proposed increase to the current clearing regulation permit fees was low. Some submissions highlighted the need for any progression of cost recovery to be accompanied by improvements in service delivery (rigor, consistency and timeliness). The financial impact to business was also a common theme with approximately half the submissions received highlighting the potential business impacts that the proposed cost recovery approach would have. The need for refinement of the proposed fee structure was highlighted through the proposed consultation process.

The consultation process highlighted a general lack of understanding on clearing permit exemptions and how strategic permits could benefit larger scale longer term clearing requirements. While a number of matters raised by stakeholders were beyond the scope of this consultation process, they are captured in this summary report and will help inform the Department's regulatory and legislative reform programs.

The outcomes of this consultation process have informed a decision on fees for clearing permit applications.

The department thanks all submission respondents and workshop attendees for taking the time to attend sessions and provide their feedback.

1 Background

Over a 14-week period from 10 August 2018 to 15 November 2018, the department, on behalf of the Ministers for Environment and Water, sought feedback on the implementation of a cost recovery approach for the assessment of applications to clear native vegetation and applications for water licences and permits.

This document summarises the submissions received relating to clearing permit application fees. Submissions relating to water licence and permit assessments are addressed in a separate report.

The intent of the consultation was to understand community and stakeholder views on cost recovery for applications for a clearing permit and water licence and permit assessments including:

- the appropriateness of cost recovery models
- acceptable levels of cost recovery
- impacts to individuals, businesses and industry

There was a total of 100 written submissions received relating to clearing permit applications. In addition, feedback was received from 257 attendees across seven information sessions and workshops.

1.1 Methodology

On the 15 June 2018, the Regulatory Services Stakeholder Reference Group (Appendix A) agreed to support the consultation process with the community and industry, by providing information to their members and providing consolidated advice back to the Department.

The department published a discussion paper on 10 August 2018 for a 14-week submission period, provided supporting material, a dedicated phone line, webpage with RSS feed update, and held stakeholder and community information sessions and workshops in Perth and regionally. Locations are outlined in Table 1 below.

The discussion paper used the following questions to stimulate the discussion on cost recovery:

1. Would a strategic approach to clearing, through a strategic purpose permit, benefit you?
2. Is the 'purpose component' reasonable to apply considering the added complexity of assessing this type of clearing permit?
3. Is the proposed fee structure fair and does it adequately reflect differences in the financial capacity of clearing permit applicants?
4. What is the likely impact on your business or industry of the proposed clearing fee structure?

The time and location of the information and workshop sessions were advertised in statewide and local newspapers. A full list is provided in Appendix B. An independent facilitator was used to maintain an unbiased role to stimulate discussions.

Table 1: Cost recovery information sessions and workshops

Workshop Location	Date	Number of participants
1. Bunbury	11 September 2018	35
2. Perth	13 September 2018	56
3. Broome	16 October 2018	25
4. Carnarvon	23 October 2018	37
5. Margaret River	25 October 2018	19
6. Manjimup	26 October 2018	73
7. Northam (LGA only)	29 October 2018	12
	Total	257

Registered workshop participants for a particular workshop were emailed a copy of the 'raw' feedback from their workshop to assist in developing their written submissions.

2 Summary of submissions

A total of 100 submissions provided feedback that was in part or in full related to cost recovery of the assessment of clearing permit applications.

The respondents are listed in Appendix C (excluding six respondents who requested their submissions be kept confidential).

There were also 257 attendees at the information and workshop sessions held across the state. A demographic breakdown of the submissions and workshop participants is provided in Appendix D.

3 Response to submissions

This section consolidates submissions into a set of key issues and provides a brief response to each issue. All written submissions and workshop comments were considered in the preparation of this document.

The four key issues are:

1. support for cost recovery
2. impacts of cost recovery
3. fee structure
4. department performance.

A number of submissions included comments that were considered out of scope. These have been summarised in Section 3.5.

3.1 Key issue 1 - Support for cost recovery

Support for the specific proposed increase to the current clearing regulation permit fees was low. Some agreed with the principle of cost recovery, but did not support any increase to fees. Some disagreed with the principle of cost recovery, providing reasons such as: it targets users rather than beneficiaries; the current regulatory service is ineffective; and as there is no clear incentive or accountability to improve service delivery efficiency, there is a risk that applicants will subsidise an inefficient system.

Some local governments and individuals who responded were accepting of the proposed fees. Few noted that the proposed fees should be higher than suggested. Many of the remaining local governments that responded supported the principle of the user pays, however, often stated that their services benefitted the community and costs should therefore be borne by the taxpayer.

The Western Australia Local Government Association (WALGA) stated:

... while WALGA agrees in principle that the cost of regulatory activities should be borne by those who benefit most from the service, in this case it does not agree that Local Governments should be subject to cost recovery for clearing permit applications. Rather WALGA considers the incidence of this cost is already being borne appropriately by Western Australians through general taxation (as is also the case for state government agencies).

A number of submissions outlined conditional support for cost recovery contingent on:

- improvement in regulatory service delivery without impairment of environmental outcomes
- transparent, accountable and cost-efficient implementation, including how fees are determined and spent
- improved rigor, consistency and timeliness of the regulatory service delivery, including provision for service level guarantees.

The respondents requested more information on how the proposed cost recovery schedule leads to improved efficiencies, and how it meets the department's strategic outcomes and key performance indicators.

Respondents noted that the discussion paper did not provide details of the actual deliverables that will result from the proposed fee increase. Concerns were raised that any potential revenue generated from increased cost recovery would be absorbed by central revenue, rather than reinvested in the department to improve regulatory service.

The Chamber of Minerals and Energy of WA (CME) stated:

Any pricing model for government fees and charges will need to balance multiple considerations including administrative burden, equity and fairness, transparency, and economic efficiency. For service delivery costs recovery models, a key trade-off will be between the administrative burden of accurately assessing the true individual (rather than average) cost of service delivery (where service delivery is not homogenous) versus equity and fairness. Depending on the model adopted, minimising cross-subsidisation also becomes an important consideration.

Summary response to submission

The department acknowledges that there are wide-ranging views on cost recovery in general and on the specific level and method of cost recovery proposed for clearing permits.

The Joint Standing Committee on Delegated Legislation (the committee) have governance oversight on the setting of fees and charges. The Committee scrutinises all regulations, by-laws, rules, local laws, major metropolitan region schemes and other subsidiary legislation made by agencies on behalf of the parliament of Western Australia.

The committee expects agency costing systems to determine the costs associated with a fee or charge to the lowest organisational structure that is realistically practicable and reasonable. This means that for each fee or charge, the committee expects agencies to provide data to support their assertions about cost recovery, having regard to what is practicable and reasonable. This parliamentary process provides appropriate transparency and oversight of the department's revenue and expenditure.

As part of the department's review of clearing permit assessment costs, the department engaged an independent consultant to review the resources required to assess clearing applications and the costs incurred by the department. This information was used to help inform the proposed increase in fees. The proposed fee increase outlined in the discussion paper represented approximately 25 per cent of the actual costs to the department of assessing clearing applications. As outlined under sections 3.2 and 3.3 of this document, the new fee structure reduces this cost recovery to 6 per cent.

The department acknowledges and understands the concerns raised by local government and WALGA that their services often benefit the broader community, and not just ratepayers, and that the costs are therefore more appropriately borne by the taxpayer. To this extent, the department notes that the proposed fee increase represents 6 per cent of the actual costs to the department.

The department also acknowledges that improvements are required in the timeliness of clearing permit assessments and how the service is administered. To date, timeliness has been limited by the resources available to the department. Application fees have not been increased since they were first introduced in 2004; however, implementation and administration costs have continued to rise since this time.

The department's strategic direction of being 'a responsive and credible regulator', as outlined in the strategic plan 2018–21, provides a direction for the department to address some of these concerns. In particular:

- we will streamline our approach to regulatory assessments and advice, to provide consistency and certainty for stakeholders
- our internal practices, online systems and resources will deliver good customer service, and we will apply regulatory best practice principles.

The government has committed to reinvest all revenue generated into the department to improve service delivery outcomes and realise these goals.

The department intends to invest any proposed increases in revenue in people and systems to deliver these improvements, being the key aspects of the strategic direction. This will include increasing the resources available to carry out assessments and reform programs (including increasing staff numbers), improving systems (including availability of data and improved policies and guidance) and streamlining processes, through programs such as Streamline WA. These improvements and developments will assist the department in being a responsible and credible regulator, and in promoting science and evidence-based decisions making, consistent with its strategic plan 2018–21.

3.2 Key issue 2 - Impacts of cost recovery

Approximately half of the submissions received and a number of workshop comments considered the impact of cost recovery unacceptable. Primary producers indicated that they were unable to pass the application costs on through their value chain. Some submissions outlined that total costs, inclusive of the cost of determination delays, flora and fauna survey costs, and the proposed applications fees, were too high and consideration of the need to balance costs with economic activity and growth was required.

Local government

Local governments represent a large (35%) proportion of the clearing permit applications made annually, mainly for road construction and maintenance. The three key impacts raised by local governments were:

- cost recovery will shift costs from state to local government
- cost recovery targeting users, rather than beneficiaries, as most permit applications are for road safety and fire prevention purposes, i.e. benefit non-rate payers
- Local governments in the intensive land use zone, and those with high road to ratepayer ratios will face higher costs.

Local government submissions indicated that these impacts will result in potential delays to road works, local government reallocating funds from other community service programs or increase rates and was considered unreasonable to bear if the regulatory service delivery is ineffective.

The City of Armadale stated that:

As a local government authority within the 'Intensive Land Use Zone' the proposed changes will increase the cost of project delivery and maintenance of community assets, ultimately impacting on the city's ratepayers. Additionally, data provided at one of the consultation workshops indicated that state and local government comprise a majority percentage of clearing permit applicants. Therefore given this additional cost burden will ultimately be passed onto the city's rate-payers through rate increases, and/or impacts to community infrastructure, the city views this proposal as an exercise in cost shifting.

The city suggests further consideration of an equitable fee structure to better reflect the impacts to local communities that may result from passing these additional costs onto local government.

On the basis that local governments could be providing a high proportion of the cost recovery revenue base, several measures were suggested to address regulatory service delivery for local government, including the creation of a dedicated section at the department, servicing local governments.

Of those respondents that considered the impact acceptable, some outlined concerns that high costs could increase the incentive for proponents to undertake illegal clearing. Submissions sought assurances that the department will monitor compliance and maintain a credible risk of detection of illegal clearing. Some submissions considered that the proposed fee structure would provide a pricing signal to reduce the amount of proposed clearing applied for, resulting in improved environmental outcomes.

Public benefit

Comments related to clearing activities for food production by primary producers or public purpose by a federal, state, local government or government trading entity, often

requested an exemption from application fees. However, there was variation in how to define public benefit. There was a strong sense from primary producers that the benefit of locally grown produce was a public service due to job creation, generating a taxable income, regional development and social benefit of providing locally grown food. Some submissions questioned the net benefit of shifting the cost of assessment onto primary producers or ratepayers.

The Pastoral, Property Right and Resources peak body stated:

The economic activity and wealth creation that flows from land clearing or use of water has a wide range of public good outcomes to Western Australian society including employment and more vibrant regional and state communities and economies.

Similar to local government, the public benefit concerns raised by primary producers focused on the fees being paid by users, rather than beneficiaries.

Strategic purpose permits

Some submissions and workshop comments supported the strategic approach on some level, as it provides a range of benefits, including reducing the application numbers; aiding the monitoring and assessment of cumulative impacts; and providing flexibility. However, those supportive of the strategic purpose permit were not all supportive of increases to fees. Some local government submissions supported the strategic purpose component, while the other submissions were silent on the strategic purpose permit component.

The Shire of Serpentine Jarrahdale commented that:

If higher fees are going to apply, it will be preferable (in terms of cost and effort) to submit one purpose permit application rather than several area permits. Flexibility will, however, be required as local government may not always be equipped or have the capacity to prepare a thorough purpose permit application. Scheduling of works requiring clearing may not be completed when an application is submitted, so it may be useful to be able to add further areas to a purpose permit later during its period of validity. A purpose permit would be useful for strategic forward planning.

Similarly, the Shire of Toodyay was of the view that:

The concept of a strategic purpose permit concept could benefit the shire. It is seen as a logical approach to clearing in circumstances where clearing small areas over a larger [sic] is desirable to avoid the whole clearing of an area.

Summary response to submission

The department acknowledges the concerns raised regarding the impacts of increased costs on business, and the concerns of local government and primary producers in

relation to any perceived cost shift from state to local government, primary producers and ratepayers. In particular, the department acknowledges the concern that the cost burden of any increase in fees falls on the users, rather than the beneficiaries, of clearing applications.

Giving consideration to impacts on business, fees associated with clearing under five hectares have been reduced. This reduction to fees, the further fee reductions outlined under section 3.3 of this document, and continued review and refinement of clearing permit assessment costs through an independent consultant, have reduced the proposed fee increase outlined in the discussion paper from 25 per cent of the actual costs incurred by the department to 6 per cent.

As noted in the discussion paper, there have been no increases to clearing permit application fees since the clearing provisions were introduced in 2004. The proposed fees are also consistent with, or lower than, the fees imposed in other Australian jurisdictions. While the department acknowledges and understands that the increased fees may have some impact on users, it considers that this impact is balanced against the benefits that will result from improved resourcing and development of department assessment systems.

The department also acknowledges concerns that increased fees may result in a greater incentive for proponents to undertake illegal clearing. In response to this concern, the department notes that it undertakes a range of compliance activities to monitor compliance with clearing regulation requirements, including the use of satellite programs monitoring vegetation changes across the state. This ensures that the department is able to monitor and respond to any increase in potential unlawful clearing that may result as an unintended outcome of the proposed fee increases. In addition, the department intends to invest some of the revenue raised in the development of improved data collection programs. Such data will enable the department to further improve its compliance and enforcement activities.

The department acknowledges comments regarding the potential benefits of a strategic purpose permit approach to clearing of multiple areas over a longer period of time. In particular, the department notes how such permits would benefit local governments, and other proponents, with larger scale, longer term clearing requirements.

The use of strategic purpose permits may also financially benefit applicants with longer term clearing plans that can be consolidated into a single permit. Further administrative reductions in reporting may benefit the permit holder, resulting in a streamlined process.

The department is of the view that, overall, the changes in cost recovery level may create a pricing signal that is likely to incentivise minimisation of clearing footprints, while also improving the assessment and monitoring service that the department is able to deliver.

3.3 Key issue 3 - Fee structure

Purpose component, fairness and equity, inadequate justification of fee structure

Many submissions raised unfairness/inequity as an issue in the proposed fee structure. In relation to the strategic purpose permit fee component, there was some level of support, but there was also a level of uncertainty with how the cost structure had been derived.

Some noted that the capacity to pay should not be a factor in setting application fees and fees should only reflect the actual effort of assessing clearing permit applications.

The Wildflower Society of Western Australia Inc. stated:

The proposed fee structure should reflect the complexity and environmental significance of the landscape and the area proposed to be cleared, irrespective of the proponent's capacity to pay.

CME stated that it:

... strongly recommends the additional \$3000 industry-specific fee applicable to the resources sector be removed, so all sectors of the economy are treated equitably.

Fees for bilateral assessments, amendments, renewals or transfers

Clarification was sought on the level of cost recovery for bilateral assessments, amendments, renewals or transfers of clearing permits. This clarification was extended to fees associated with the review and approval, or otherwise, of documentation (e.g. management plans) where they are required to be submitted under strategic purpose permits and site visits.

For example, CME stated that:

The discussion paper also fails to clarify fees (if any) associated with amendments, renewals or transfers of clearing permits. CME recommends any changes made to clearing permits which are administrative in nature and do not require an actual 'assessment' of clearing, should incur no cost, or at worst, a nominal administration fee (e.g. retain the existing \$200 fee).

Summary response to submissions

The department acknowledges the views and concerns raised on the proposed structure of clearing permit application fees, particularly that capacity to pay should not be a factor in setting application fees, as is proposed in the purpose permit component fee. The department agrees that capacity to pay should not be a factor in determining the fees applicable. Accordingly, the new fee structure revises the recommended purpose fee to a single fee, and removes the industry based \$5000 purpose permit fee. This amendment takes into account the equity issues raised in consultation, while maintaining the department's commitment to ensuring that the environmental impacts of clearing are adequately considered.

This amendment to the proposed fees, the further fee reductions outlined under section 3.2 of this document, and continued review and refinement of clearing permit assessment costs through an independent consultant, have reduced the proposed fee increase outlined in the discussion paper from 25 per cent of the actual costs incurred by the department to 6 per cent.

In response to concerns regarding a lack of clarification in relation to certain fees, the department confirms that fees to amend, surrender and transfer clearing permits will not be amended from their current levels.

The department confirms that there is no plan as part of this process to recover costs for bilateral assessments, strategic purpose permit secondary assessments, and site visits.

3.4 Key issue 4 - Department performance

A common theme in all workshops and many submissions was that the department should deliver a more efficient assessment service. Comments indicated that the department's regulatory service delivery is complex and inefficient; decisions and advice are both inconsistent and not up to standard; and respondents have limited confidence in the agency's capacity to deliver improvements and manage its costs.

There is an expectation for the regulatory service delivery to improve should fees be introduced.

The Association of Mining and Exploration Companies (AMEC) provided the following comment:

The discussion paper however provides no detailed or specific indication of what the actual deliverables will be as a result of the proposed fee increase. This is a major shortcoming and should be addressed before any changes are made to the current fee structure.

Summary response to submission

The department acknowledges and understands concerns that any increase in fees must be accompanied by an increase in the quality of service delivered by the department.

The department agrees that improving timeliness and quality of assessments should be a key outcome of any increase to the current fee structure. The department also acknowledges that greater transparency on improvements and timeframe performance is the foundation for industry acceptance of higher charges.

Meeting timeframes is a priority for the department and industry, and cost recovery investment in people and systems will help deliver a better service. The department currently reports quarterly on regulatory performance and is undertaking a range of

reforms to improve the efficiency and effectiveness of its activities which will result in improved timeframes.

The department's strategic plan 2018–21 also provides a direction for the department to address the above concerns. Through the process of partial cost recovery, the department will be able to invest the resources required to improve the timeliness and quality of its assessments. This will include increasing staff numbers and developing more advanced policy and data collection tools to support transparent, efficient and consistent decision-making. This increase in resources is supported by the department's strategic goal of being a 'responsive and credible regulator' and will enable it to deliver key aspects of its strategic plan, including streamlining its approach to regulatory assessments.

To ensure that there isn't an inequitable cost shift to users of the assessment system, and in view of the fact that clearing permit applications often benefit a broader section of the community, the cost recovery will be limited to 6 per cent of the actual costs incurred.

The department is confident that increased resources will enable it to deliver on tangible improvements to its services.

3.5 Out-of-scope issues

A number of matters were raised in submissions received during this consultation process that were outside the scope of cost recovery. While these are not specifically addressed in this report, the information has been captured by the department and will inform the department's regulatory and legislative reform programs. The department is committed to ongoing engagement with its stakeholders and the community and the matters raised through submissions and in consultation will be considered as part of this engagement, regardless of the outcome of this fee proposal.

Matters raised broadly included:

- proposed legislative amendments
- potential Improvements to processes, procedures
- regulatory capture - silviculture currently considered clearing
- exemptions
- market solutions
- amendments to the applications
- appeals
- increased enforcement action and restriction on clearing in the South West Land Division.

Appendices

Appendix A - Member Organisations of the Regulatory Services Stakeholder Reference Group (RSSRG)

Association of Mining and Exploration Companies (AMEC)
Australian Petroleum Production and Exploration Association (APPEA);
Chamber of Commerce and Industry WA (CCI)
Chamber of Minerals and Energy (CME)
Conservation Council of WA (CCWA)
Department of Biodiversity, Conservation and Attractions (DBCA)
Department of Health (DoH)
Department of Jobs, Tourism, Science and Innovation (DJSTI)
Department of Mines, Industry Regulation and Safety (DMIRS)
Department of Planning, Lands and Heritage (DPLH)
Department of Primary Industry and Regional Development (DPIRD)
Department of Water and Environmental Regulation (DWER)
Environmental Consultants Association (WA) (ECA)
Environmental Defenders Office WA (EDO)
Pastoralists and Graziers Association of WA (PGA)
Urban Development Institute of Australia (UDIA)
WA Farmers Federation (WAFF)
Waste Management Association of Australia (WMAA)
Western Australia Local Government Association (WALGA)

Appendix B - List of newspaper advertisements

West Australian, 25 August 2018	Guardian Express, 11 September 2018
West Australian, 1 September 2018	Stirling Times, 28 August 2018
West Australian, 8 September 2018	Stirling Times, 4 September 2018
Manjimup Times, 10 October 2018	Stirling Times, 11 September 2018
Manjimup Times, 17 October 2018	Western Suburbs Weekly, 28 August 2018
Manjimup Times, 24 October 2018	Western Suburbs Weekly, 4 September 2018
Melville Times, 28 August 2018	Western Suburbs Weekly, 11 September 2018
Melville Times, 4 September 2018	Canning Times, 28 August 2018
Melville Times, 11 September 2018	Canning Times, 4 September 2018
Southern Gazette, 28 August 2018	Canning Times, 11 September 2018
Southern Gazette, 4 September 2018	Fremantle Cockburn Gazette, 28 August 2018
Southern Gazette, 11 September 2018	Fremantle Cockburn Gazette, 4 September 2018
Joondalup/Wanneroo Times, 28 August 2018	Fremantle Cockburn Gazette, 11 September 2018
Joondalup/Wanneroo Times, 4 September 2018	Geraldton Guardian, 2 October 2018
Joondalup/Wanneroo Times, 11 September 2018	Midwest Times, 3 October 2018
Eastern Suburbs Reporter, 28 August 2018	Broome Advertiser, 4 October 2018
Eastern Suburbs Reporter, 4 September 2018	Kimberley Echo, 4 October 2018
Eastern Suburbs Reporter, 11 September 2018	Bunbury Mail, 5 September 2018
Guardian Express, 28 August 2018	Bunbury South West Times, 6 September 2018
Guardian Express, 4 September 2018	

Appendix C - List of written submissions

Six respondents requested that their submissions remain confidential.

Anonymous	Forrest Industries Federation WA Inc
Association of Mining and Exploration Companies	William French
Robert Atkins	Paul Fry
Wayne Barndon	Diane Fry
Peter Beatty	Annabelle Garratt
Chris Bechard	Gingin Property Rights Group
Bevan and Denise Blakers	Guy Grant
Warwick Boardman	Bevan Hall
Alan Briggs	Tom Hill
Ian Bunch	Belinda Hopkins
Andrew Buzzard	Institute of Foresters of Australia (WA Division)
Ian Carter	John Kilrain
Graham John Carter	Garry Kilrain
Cement Concrete & Aggregates Australia	Kimberley Pilbara Cattleman's Association
Chamber of Minerals and Energy of WA	John Klepec
Lisa Chandler	Kate Lane
City of Armadale	Luxmore Lethbridge
City of Gosnells	Belinda Lethbridge
City of Joondalup	Les Lowe
John Clarke	Lower Blackwood Land Conservation District Committee
Chris Collier	Main Roads WA
Rod Copeland	Yvonne Marsden
Department of Primary Industries and Regional Development	Steve Martin
John Dunnet	Carol Metcalfe
Clive Edwards	Tess Metcalfe
Peter Elliott-Lockhart	Brett Metcalfe
Amy Elkington	Owen Metcalfe
	Forbes Metcalfe

Hon. Diane Evers as MLC - Member for South West Region	Cath Miller
Geoff North	Ianto Ward
Daniel Omodei	Susan Warner
Mick Owens	Warren Donnelly Water Advisory Committee
Pastoral, Property Rights and Resources	Water Corporation
Chris Payne	Wildflower Society of Western Australia Inc.
Bruce Pearce	Jill Wilson
Frank Peczka	Craig Wyatt
Peter Scott	
Chrissy Sharp	
Shire of Carnamah	
Shire of Donnybrook-Balingup	
Shire of Manjimup	
Shire of Serpentine Jarrahdale	
Shire of Toodyay	
Shire of West Arthur	
Graeme Sinclair	
Darryl Smith	
Bradley Smith	
South Cape Water Users Group Inc.	
Leonie Stubbs	
Town of Port Hedland	
Keith Tunney	
Roger Underwood	
Urban Bushland Council WA Inc.	
Urban Development Institute of Australia (WA) Inc.	
Vegetables WA	
WA Local Government Association	
WA Native Orchid Study and Conservation Group Inc.	
WA Property Rights Association	

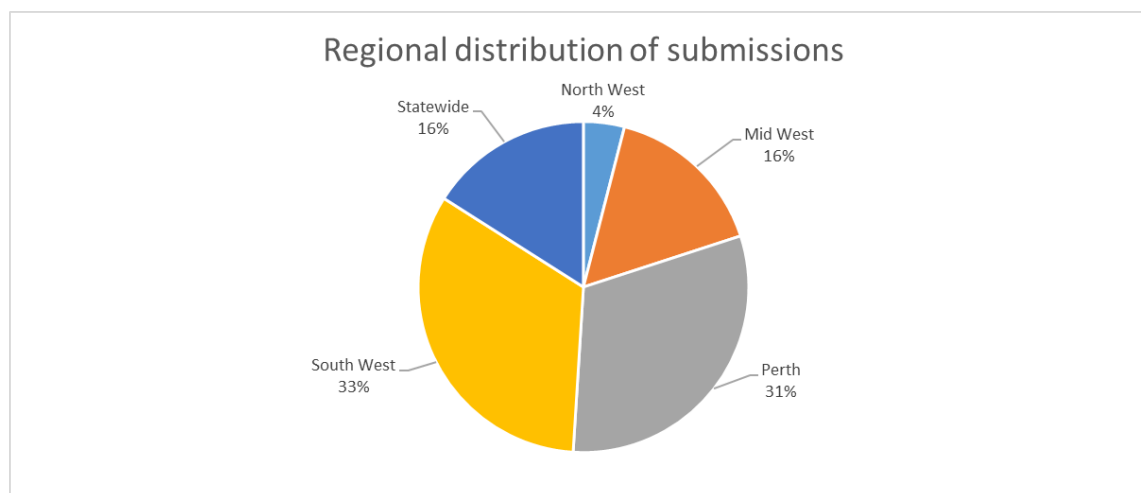
Appendix D - Demographic and regional breakdown of submissions and workshop attendance

One hundred written submissions on cost recovery of clearing permit applications were received and seven workshops were held across the state.

Written submission by region

The majority of written submissions were received from Perth and South West regions (Figure 1). Peak body submissions were taken to represent the views of their constituents, across the state.

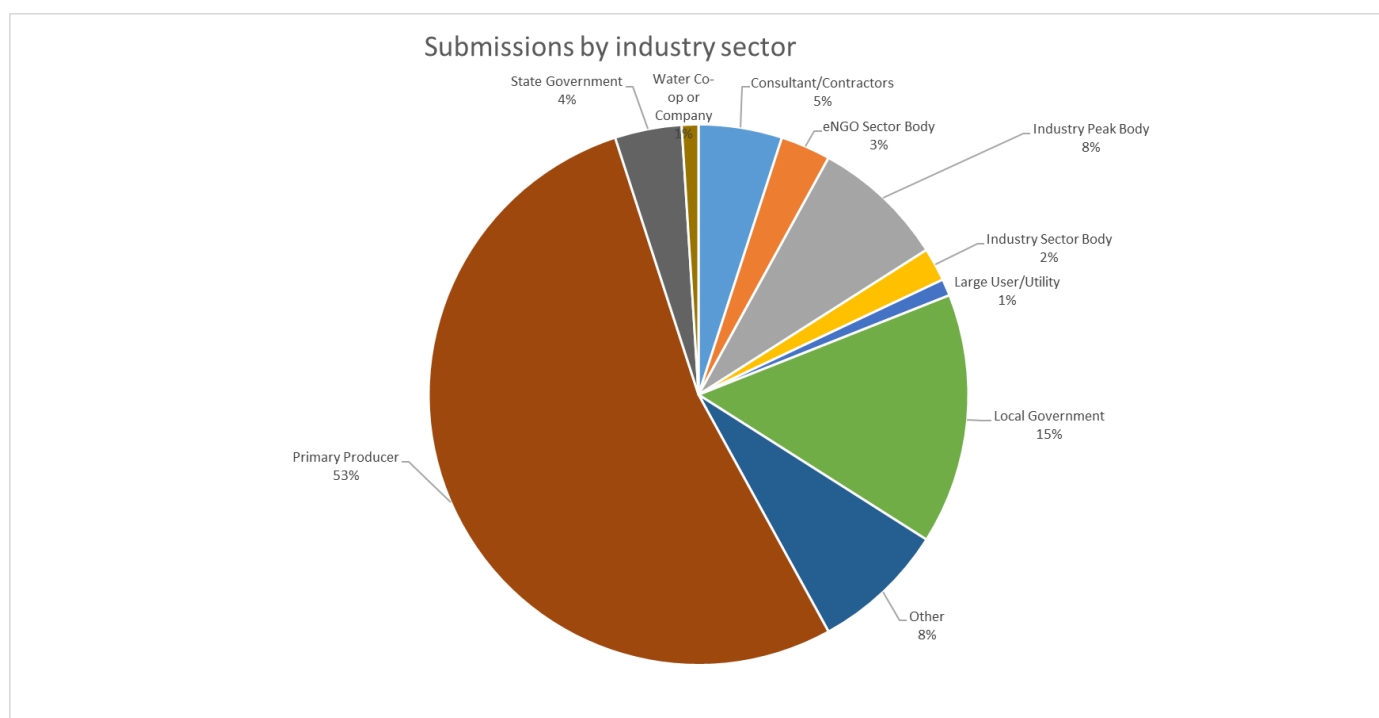
Figure 1: The regional distribution of those providing written submissions.



Written submissions by sector

The submissions received were predominately from primary producers, local government and peak industry and sector bodies (Figure 2). The issues raised were generally consistent regardless of the origin of the submission.

Figure 2: Breakdown of the number of submissions received by sector.



Workshop participants

Over the consultation period between August and November 2018, a total of 257 people participated in the seven information and workshop sessions (Table 1). Through the workshops the department collated comments that have been considered in this document.

The participants represented all sectors of the community, from individual community members, local governments to peak bodies, with the majority being identified as primary producers (Figures 3 & 4).

With regard to the Northam information and workshop session, the department undertook a targeted local government stakeholder session at this location.

Figure 3: Attendance by sector to each of the information and workshop sessions

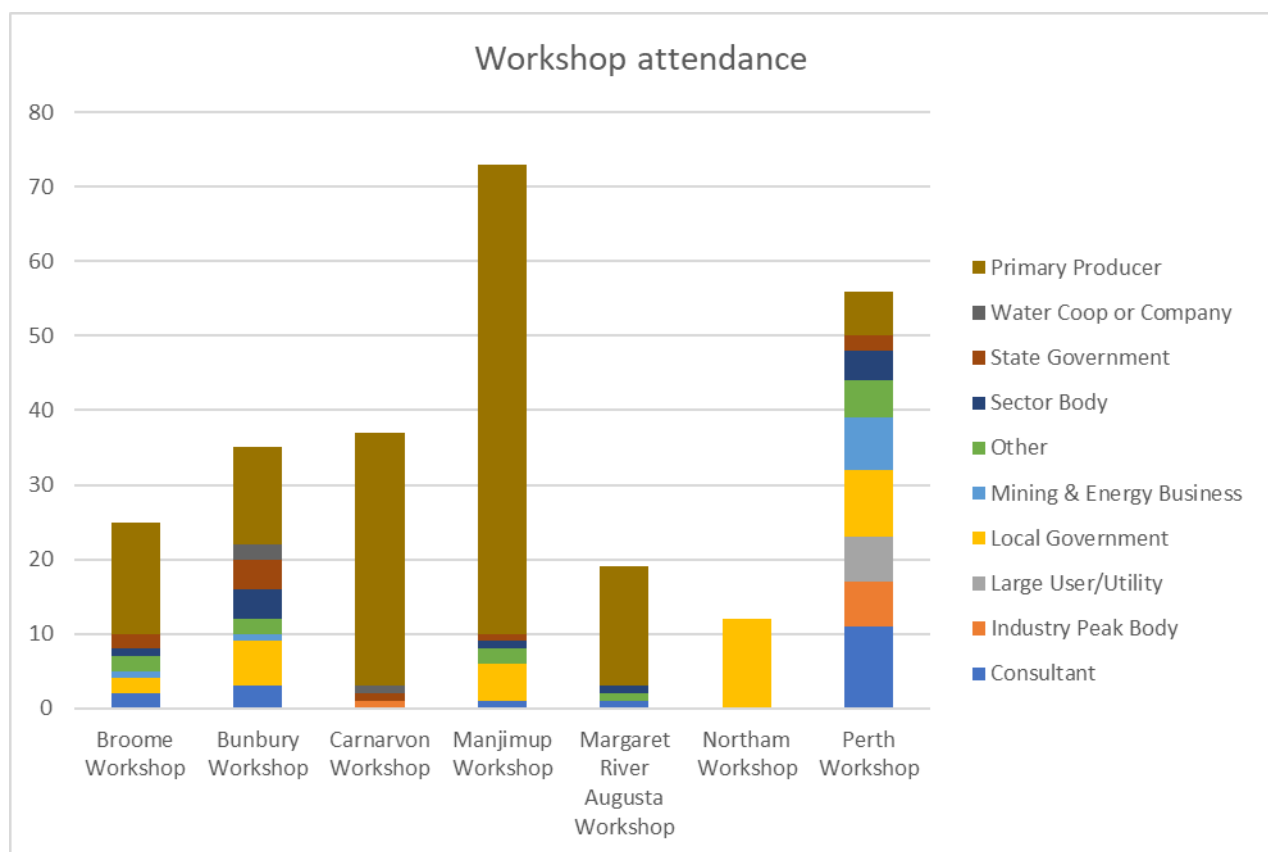


Figure 4: Sector representation across the workshop sessions.

