



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

# Consultation Summary report

Discussion paper on cost recovery for water licence and permit assessments

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](http://www.dwer.wa.gov.au)

© Government of Western Australia

April 2019

This work is copyright. You may download, display, print and reproduce this material in unaltered form only (retaining this notice) for your personal, non-commercial use or use within your organisation. Apart from any use as permitted under the *Copyright Act 1968*, all other rights are reserved. Requests and inquiries concerning reproduction and rights should be addressed to the Department of Water and Environmental Regulation.

DWERDT125746

### **Acknowledgements**

The Department of Water and Environmental Regulation would like to thank all the contributors to this consultation process.

### **Disclaimer**

This document has been published by the Department of Water and Environmental Regulation. Any representation, statement, opinion or advice expressed or implied in this publication is made in good faith and on the basis that the Department of Water and Environmental Regulation and its employees are not liable for any damage or loss whatsoever which may occur as a result of action taken or not taken, as the case may be in respect of any representation, statement, opinion or advice referred to herein. Professional advice should be obtained before applying the information contained in this document to particular circumstances.

*This publication is available at our website [www.dwer.wa.gov.au](http://www.dwer.wa.gov.au) or for those with special needs it can be made available in alternative formats such as audio, large print, or Braille*

# Contents

Executive summary .....	v
1 Background .....	1
1.1 Methodology .....	1
2 Summary of submissions .....	3
3 Water licence and permit assessment fee submissions .....	4
3.1 Key issue 1 – Views on cost recovery and fee structure .....	4
3.2 Key issue 2 – Improvement in Department services and their costs .....	6
3.3 Key issue 3 – Annualised or up-front payment .....	7
3.4 Key issue 4 – Renewals, trades and amendments .....	8
3.5 Key issue 5 – Financial impact of fees on businesses .....	8
3.6 Out-of-scope issues .....	10
Appendices .....	11
Appendix A – List of newspaper advertisements .....	11
Appendix B – List of written submissions .....	12
Appendix C – Demographic and regional breakdown of submissions and workshop attendance .....	15



## Executive summary

The Department of Water and Environmental Regulation undertook consultation with a range of stakeholders between August and November 2018 on 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 the key themes raised on cost recovery relevant to water licensing and permitting under the *Rights in Water and Irrigation Act 1914*.

A total of 176 written submissions were received throughout the consultation process. Of these, 170 submissions provided responses that were all or in part related to cost recovery for assessing water licence and permit applications. There were 25 pro forma submissions.

A total of 257 people attended seven information and workshop sessions. Feedback from these sessions have been considered in this document. Primary producers were the majority of attendees across all workshops.

Feedback varied in terms of who should be responsible for funding water licence and permit assessments and how to achieve an agreed public/ private cost recovery regime that meets service delivery requirements and good regulatory outcomes.

Many respondents did not support a fee for water licence and permit application assessments on the basis of their existing contribution to the tax system, the potential cost burden to businesses and the potential impact to communities.

Some submissions supported a level of cost recovery if it adds value to the current regulatory system and the services provided to users/licensees. Improvement in service delivery in terms of timeliness is sought if cost recovery is progressed.

Most submissions supporting fees suggested a new fee structure is required with more granular stages for low volume users. Many of the respondents in favour of fees supported an annualised fee payment option and considered this would assist small businesses.

Many submissions considered the service provided through the licence renewal process was disproportionate to the size of the fee shown in the discussion paper.

The outcomes of this consultation process will be provided to government for consideration. The information collated will be used to inform any decision on fees for assessing water licence and permit applications.

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



# 1 Background

Between 10 August 2018 and 15 November 2018, the Department of Water and Environmental Regulation sought feedback on the implementation of a cost recovery approach for:

- the assessment of water licence and permit applications under the *Rights in Water and Irrigation Act 1914* (RIWI Act)
- native vegetation clearing under Part V of the *Environmental Protection Act 1986* (EP Act).

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
- timing of any fee collection.

This document summarises the water licence and permit related submissions received in response to community consultation.

## 1.1 Methodology

On 15 June 2018, the Water Resources Reform Reference Group met and agreed to support a consultation process with community and industry, provide information to their constituents and provide consolidated advice back to the department.

Consultation with stakeholders was undertaken from 10 August 2018 to 15 November 2018 and was supported by a discussion paper published on 10 August 2018 on the Department of Water and Environmental Regulation's website.

An online form was provided on the consultation page on the department website as a convenient platform to submit information. Upon submission, respondents received an email receipt of lodgement and a copy of their response for their records. A downloadable and editable PDF hard-copy form was also provided as an option for respondents that did not wish to use the online form.

A fees help line was established to answer queries and a dedicated email address [fees@dwer.wa.gov.au](mailto:fees@dwer.wa.gov.au) was promoted to in all correspondence and on the website. This inbox was the point of contact for all submissions and communications.

A series of seven information sessions and workshops were held in Perth and regionally to provide stakeholders with the opportunity to directly discuss issues with department representatives.

The time and location of the information and workshop sessions were advertised in statewide and local newspapers (see list in Appendix A). An independent facilitator

---

was used to maintain an unbiased role to stimulate discussion of issues and departmental staff attended all workshops to clarify and discuss issues as they arose.

Table 1: Cost recovery workshops and information sessions

Location	Date	Number of participants
Bunbury	11 September 2018	35
Perth	13 September 2018	56
Geraldton	10 October 2018	Cancelled due to low registration numbers
Broome	16 October 2018	25
Carnarvon	23 October 2018	37
Margaret River	25 October 2018	19
Manjimup	26 October 2018	73
Northam	29 October 2018	12
Geraldton (briefing only)	14 November 2018	26

## 2 Summary of submissions

A total of 176 written submissions were received throughout the consultation process. Of these, 170 submissions provided responses that were all or in part related to cost recovery of water licence and permit application assessments. All respondents, except those who requested confidentiality, are listed in Appendix B.

From the 170 written submissions on cost recovery for water licence and permit application assessments, responses were collated and analysed according to key issues. There were 25 pro forma submissions.

There were 257 attendees at workshops held across the state.

A demographic breakdown of the submissions and workshop participants is provided in Appendix C.

---

## 3 Water licence and permit assessment fee submissions

This section consolidates all written submissions and workshop comments into the key issues identified below:

1. Views on cost recovery and fee structure
2. Improvement in departmental services
3. Annualised or up-front payments
4. Fees for renewals and trades
5. Financial impact on businesses

### 3.1 Key issue 1 - Views on cost recovery and fee structure

#### *Submissions not supporting cost recovery*

Most submissions were not supportive of any costs being recovered to assess water licence or permit applications. The most common reasons cited were:

#### *Opposition on the basis of other taxes and charges*

Most submissions did not support the principle of cost recovery and considered that the services provided are already funded via taxes paid.

Some submissions stated that cost recovery for water licence and permit application assessments is 'double dipping' and fails to consider the local, state and federal taxes, rates, levies and charges already paid by businesses. Some respondents indicated that industry contributes substantially to the taxation system through the payment of company and personal taxes, GST and state payroll tax to provide services to the public and that these taxes should provide them with some service in terms of water regulation.

Licensed water users in rural communities considered the proposed fees unfairly target them because investment is made in Perth water infrastructure that is paid for through their taxes.

#### *Exemptions*

Some submissions suggested some water use sectors should be exempt. Examples included local government where water is used for public benefit, users of very low volumes of water and Indigenous communities for self-supply domestic water. Some submissions stated that the taxpayer should fund applications that directly contribute to the community (e.g. water for public open space or community infrastructure).

Introduction of fees was seen as a significant cost burden on local government particularly the impact to ratepayers and the opportunity cost on alternate activities.

This included the view that it would be cost shifting away from state government to local government ratepayers.

#### *Timing of introducing fees*

A number of submissions suggested that the introduction of any water licence and permit assessment fee be postponed until after introduction of new water resources management legislation.

It was considered that a new Bill would provide benefits to growers in terms of longer licence duration, streamlined licence and permit assessment and modern water legislation. These benefits could be balanced against new fee introduction.

#### *Submissions supporting cost recovery*

Some submissions supported full or partial cost recovery. Those in support of full cost recovery believed that it was unfair that commercial users pay nothing for access to the state's water resources. It was stated that water users benefit from regulation in the form of licences and permits that enable them to operate commercially and that they should contribute to the cost of that regulation. Some submissions maintained the introduction of fees could have a positive impact and lead to improved water management both from a resourcing perspective and through the price signal reducing speculative applications.

Those submissions supportive of partial cost recovery stated that it was appropriate that fees for water licence and permit assessments are reflective of the level of effort required to assess licence and permit applications, and of the risk to the water resource. Some supported higher fees where there is commercial advantage or profit and almost all recognised that the fee should be higher where more assessment effort is required.

Economic use of water delivers both private and public benefits. There is some level of support for the introduction of a user pay component for the assessment of water licence and permit applications, but it was considered that it should be in proportion to the private benefit estimated from private-public benefit analysis.

Member feedback from a peak body group indicated that taxpayers should pay the cost of managing the water resource, but licensed users should pay the cost of the licensing process where they choose to construct and use facilities which involve taking of water for economic gain or for community benefit.

#### *Fee structure*

Many submissions stated that it is unfair to charge full cost recovery (100% cost) for government services and that the level of fees in the fee structure provided in the discussion paper were unreasonably high and unjustified. Many commented that there was not enough supporting information for stakeholders to understand the justification of the fee amount.

There is concern that the level of the fees in the discussion paper did not adequately reflect the size of the commercial operation taking water, the risk to the resource

---

does not adequately consider licence volume and a low volume threshold for small licences should be considered.

The 25 pro forma submissions were fundamentally opposed to cost recovery, although did state a preference for an appropriate upfront licence fee with an amount comparable to driver's licence fee, if fees are introduced.

A number of submissions suggested more refinement of the fee structure was required to recognise regional specific issues, differing hydrological regimes and fees for specific industry types. This was mirrored in the workshops where comments stated that the fee structure was unfair and needed refinement.

It was noted that many thought that the proposed fee structure in the discussion paper unfairly discriminated against small operators or low volume users and does not adequately reflect the risk posed by the size of the allocation. There was a strong and consistent theme that larger users should pay more to access water resources.

For example, one submission stated that the Swan Valley is well understood in terms of aquifers and this level of knowledge should mean a lower level of effort in assessing an application and attract a lower fee. It was also stated that the proclamation of the Warren and Donnelly River catchments was community-driven to ensure good management of the water resources and considered it to be inequitable for these areas to incur fees to capture water.

Submissions also noted that many growers hold multiple licences and so the combined imposition is likely to be an extremely large cost to business.

### 3.2 Key issue 2 - Improvement in department services and their costs

A common theme through the workshops and many written submissions was that the department should be more efficient in its water licencing and permit assessment service. Many submissions stated that improvements in process and efficiency should first be explored to reduce department costs before costs recovery is sought.

There is a reluctance to pay for what is perceived as an inefficient department service, and concerns that the introduction of cost recovery diminishes the department's incentive to improve their efficiencies.

Feedback indicated the service currently received by growers is inconsistent. There was a sense of frustration with assessment times and approvals impacting on businesses.

Suggestions were received that any cost recovery should be a small portion of the overall cost in order to promote efficiency within the department.

#### *Justification for introducing fees*

Some submissions indicated that the discussion paper did not adequately justify the proposed fee structure and assessment methods. Additionally, some submissions requested more information on how the proposed cost recovery schedule actually

leads to improved efficiencies, and how it meets department strategic outcomes and water related key performance indicators.

Some submissions noted that the discussion paper provided no detailed or specific indication of what the actual deliverables will be as a result of the proposed fee. Further clarification was sought on the distribution of any revenue raised by the licence and permit assessment fees. There was concern that revenue would be distributed to central revenue rather than the department with a view to providing an improved service to licence holders.

#### *Fee should reflect administrative process only*

The cost basis in the discussion paper included all of the costs incurrent in delivering the licencing system. Written submissions and workshop attendees stated that the department should only look to recover direct costs such as resourcing of licencing officers and not the corporate overhead costs. Comments were also made that fees for water licensing should be no more than the cost of the actual licensing process and any fee that is paid for the licensing and regulation of water licences is used to improve the service. Stakeholders stated that if revenue from fees returned to government consolidated revenue then the fees could be perceived as an additional tax.

### 3.3 Key issue 3 - Annualised or up-front payment

Some submissions commented on how any fee should be collected, with a significant majority of those submission supporting cost recovery preferring an annualised fee, spread over the term of the licence. Other comments suggested preference for a one-off upfront fee, or a phased fee increasing over the term of the licence, or a one-off payment at the end of the assessment process.

Most submissions did not support the significant up-front outlay of fees applying to the mining and public water supply sectors. There was concern that small agricultural and horticultural businesses may not have the capacity to absorb upfront fees, and most would not have budgeted for their introduction.

Many submissions stated that if a fee applied, then a flexible payment option that spread the financial impact over the term of the licence would be preferable, assisting in budgeting and enabling better business planning. Other submissions on the timing of fees included:

- An initial payment made on application, with the remaining balance annualised over the term of the licence.
- Utilising a phase-in approach over a five-year period in a stepwise fashion.
- One-off small fees such as 26D licence applications charged as such, with annualisation of larger fees such as the 5C licences.
- Both upfront or annualisation of fees with a discount for upfront payment.

---

## 3.4 Key issue 4 - Renewals, trades and amendments

### *Fees for water licence renewals*

Some submissions commented on the level of fees for licence renewals in the discussion paper. There is a view from stakeholders that the fee levels for renewals as detailed in the discussion paper are excessive. Many submissions stated that the renewal of a water licence is usually a 'rubber stamping' process and that the fee in the discussion paper was disproportionate to services provided.

Some submissions stated that the level of fees in the fee structure were reasonable, but renewal fees should be set to a lower level, with suggestion of an application fee and \$149.50 for licence renewal for five years. Alternatively, it was recommended that the department consider fees based on the 2011 ERA final report which proposed a \$990 fee for renewal of a 5C water licence in a 'High Risk' resource.

### *Fees for water trades, transfers and agreements*

Some submissions acknowledge the suggestion to charge a nominal trade fee to encourage an effective water trading market. However, it was questioned if the taxpayer should cover these costs and suggested fee tiers for water trades.

### *Clarification on licence amendment fees*

Clarification was sought on licence amendment fees, with many submissions believing that level of fee was too high for minor amendments such as changing the name or address on the licence.

Submissions indicated that the existing \$200 fee for trades or transfers of licences is acceptable but that two licence amendments as a result of a trade must be charged at a substantial discount. There was concern that the amendment fee would make small volume water trades unviable.

## 3.5 Key issue 5 - Financial impact of fees on businesses

Most of submissions received considered the financial impact that fees for water licence and permit assessments may have. These issues were most strongly represented by primary producers.

The submissions indicated the impact of the introduction of water licence and permit assessment fees will vary with industry type. Some stakeholders believed that the fee structure in the discussion paper was acceptable and that fees would have minimal financial impact on their operations if sufficient notice is given and that consideration should be given to the financial impact spread over the 10-year term of the licence. Some submissions had neutral views on cost recovery noting that fees for water licences and permit assessments are another cost of doing business. Other submissions were unsure of what the financial impact might be for their business.

### *Impact on farmers*

Most horticulture/agriculture sector submissions expressed concern about the additional cost burden on farmers and stated that cost recovery would have an unacceptable impact on their business. Many indicated their inability to pass on these costs would give them no choice but to absorb the additional costs. Further concern was noted that some businesses would not be capable of absorbing the additional cost and they would need to re-consider the viability of their business. Primary producers noted high input costs (labour, land, fertiliser) and the additional input cost for water licence and permit assessments would have a large financial impact on their business. These comments were also expressed during the workshops, which had a large number of primary producers present.

Where the additional input cost could be passed on through an increase in the product price, submissions considered they would become uncompetitive with international and domestic products that would not be subject to similar costs.

Feedback indicated that horticulture businesses are marginally profitable and imposing additional costs on the industry will make it more difficult for growers to compete with national and overseas producers as Western Australian horticulture production is geographically isolated from other nationally populated cities (markets) and input suppliers. Some submitters noted that some growers hold multiple licences and so the combined imposition is likely to be an extremely large cost to those businesses.

Some submissions suggested that the introduction of fees may encourage unlicensed water use and that if fees were introduced they would not pay it.

### *Impact on rural communities and programs*

In addition to the impact on primary businesses, there were questions about the impact on regional economies, particularly in regions where water based initiatives are regional development priorities (i.e. Carnarvon Food Bowl, La Grange development and Manjimup horticulture). Submissions noted that primary industry is a substantial employer in regional and metropolitan communities with flow on effects through the supply chain from input suppliers to processed food production and tourism. Any financial impact on businesses creates a ripple effect along this supply chain and employment opportunities – especially in regional areas. Stakeholders considered there is perceived conflict between water charges and other Government supported regional development initiatives.

### *Impact on local government*

Water licence and permit assessment fees are seen as a cost burden on local government in relation to the level of the fee, passing the cost onto ratepayers and the opportunity cost of activities that the money could alternatively be used for. On a wider scale, taxpayers, ratepayers and consumers will receive the increased cost of doing business and this may be perceived as state government cost shifting.

---

### *Equity*

Many submissions raised equity as an issue and stated that the level of fee in the discussion paper would not be appropriate as in fully allocated water resources, small users would incur the same fee as very large users.

There were requests for greater clarity on how the risk categories are determined and hence how the fees are determined. Stakeholders would have liked a fee structure recognising variation in water resources and therefore more fee categories that better reflect the assessments and fees.

### *Public benefit*

Some submissions stated that water used for public benefit should be exempt from 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 and social benefit of providing locally grown food. Water use by local government was often cited as an example where cost recovery should not be sought on the basis that irrigation activities are of community benefit. These stakeholders questioned the net benefit of shifting the cost of assessment onto customers or ratepayers.

Conversely, feedback was received that taxpayers should pay the cost of managing the water resource, but licensed users should pay the cost of the licensing process where they choose to construct and use facilities which involve taking of water for economic gain or for 'community benefit' (e.g. schools, parks and gardens, hospitals, public water supply, etc.). Mining stakeholders requested that any future fees and charges for the mining industry should be aligned with fees for other industry sectors.

### *Benefit of data to government*

Some submissions discussed the cost of infrastructure and providing information in support of licence applications to be recognised by the department as a water management contribution and offset any fee. Their view is that water licensees and applicants expend substantial resources in the form of money, time and expertise to undertake the investigations of water resources and land suitability with the prospect of obtaining a licence. The information provided increases the knowledge of water resources and directly benefits the Department and other users, offsets the cost of the department in managing the resource and should be rewarded.

## **3.6 Out-of-scope issues**

Some of the submissions raised matters that were outside of the scope of discussion on cost recovery for water licence and permit assessments. Many of these provided an important broader perspective on water resource management issues and will be considered by the Department as appropriate.

# Appendices

## Appendix A - 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 B - List of written submissions

Anonymous	City of Joondalup
Association of Mining and Exploration Companies	John Clarke
Australian Petroleum Production & Exploration Association	Chris Collier
Australian Water Association (WA Branch)	Darren Colombera
John and Ros Bachos	Rod Copeland
Matt Bamkin	Mike Credaro
Wayne Barndon	Robert Credaro
Chris Bechard	Mark Cumbers
Peter, John, Stephen and Jason Bendotti	Paul and Domenica Daniels
Rob Blackburn	Todd Davidson
Bevan and Denise Blakers	Ian Dawson
Bevan Blakers	Deejay Nominees Pty Ltd
Graham Blincow	Matthew Della Franca
Warwick Boardman	Department of Primary Industries and Regional Development
John Brealey	Heather Dewar
Alan Briggs	John Dunnet
Ian Bunch	Clive Edwards
Sam Burton	Donnette Edwards
Andrew Buzzard	Peter Elliott-Lockhart
Ian Carter	Amy Elkington
Graham John Carter	John Evdokimoff Jnr
Mario Casotti	Hon. Diane Evers as MLC - Member for South West Region
Cement Concrete & Aggregates Australia	Ray Falcinella
Chamber of Minerals and Energy of WA	Forrest Industries Federation WA Inc
Lisa Chandler	William French
City of Armadale	Paul Fry
City of Bayswater	Diane Fry
City of Gosnells	

David Galwey	Russell Lewis
Annabelle Garratt	Paul Longo
Gingin Property Property Rights Group	Les Lowe
Angela Gosden	Lower Blackwood Land Conservation District Committee
Guy Grant	John and Leanne Lutz
Grape Growers WA	Main Roads WA
Mike Gray	Manjimup and Pemberton Landowner Group
Jon Griffiths	Kim (Mick) Mann
Bevan Hall	Yvonne Marsden
Wayne Hammond	Steve Martin
Brad Harnett	Katrina and Shakhar Masalkar
Glenn Harper	AD RA and JA Mathews
Darren Haunold	Jan McIntosh
Dave and Lisa Henderson	Carol Metcalfe
Tom Hill	Tess Metcalfe
Belinda Hopkins	Brett Metcalfe
Hon. Barry House	Owen Metcalfe
Maurice Humphrey and Nadeen Jancey	Forbes Metcalfe
Irrigation Australia	Gary Miles
Jardee Glen	Cath Miller
Karen Karri Davies	Arthur Mills
Fredrick Kempes	Max Montgomery
John Kilrain	David Morcombe
Garry Kilrain	Pippa Nielsen
Kimberley Pilbara Cattlemans Association	Sue and Ardal Nigg
Stephen Kirby	Geoff North
John Klepec	Andrew Ogden
Kate Lane	Daniel Omodei
Luxmore Lethbridge	Cliff Owen
Belinda Lethbridge	

---

Mick Owens	Swan Valley Ratepayers and Residents Association
Pastoral, Property Rights and Resources	
Chris Payne	Lisa Tana
Bruce Pearce	Town of Port Hedland
Frank Peczka	Keith Tunney
Peter Price	Turf Growers Association of WA Inc.
Bill Radford	Urban Bushland Council WA Inc.
Gemma Rice	Urban Development Institute of Australia (WA) Inc.
Kim Robinson	Vegetables WA
Brad Rodgers	Paul Vines
Gary and Tracey Ryan	Jim Volmer
Peter Scott	WA Local Government Association
Chrissy Sharp	WA Property Rights Association
Shire of Carnamah	Ianto Ward
Shire of Donnybrook-Balingup	Susan Warner
Shire of Manjimup	Warren Donnelly Water Advisory Committee
Shire of Serpentine Jarrahdale	Water Corporation
Shire of Toodyay	Cameron White
Graeme Sinclair	Wildflower Society of Western Australia Inc.
Darryl Smith	Paul Willmott
Bradley Smith	Gordon Wilson
John Smith-Wright and Brad Turner	Jill Wilson
South Cape Water Users Group Inc.	George and Harriet Wren
Leonie Stubbs	Craig Wyatt

## Appendix C - Demographic and regional breakdown of submissions and workshop attendance

### Written submissions

The majority of written submissions were received from Perth and the South West. Primary producers, with 65 per cent of total submissions coming from this sector. Peak body submissions represented the views of multiple stakeholders and were recognised as joint submissions from their constituents.

Figure 1: The industry sectors of those providing written submissions

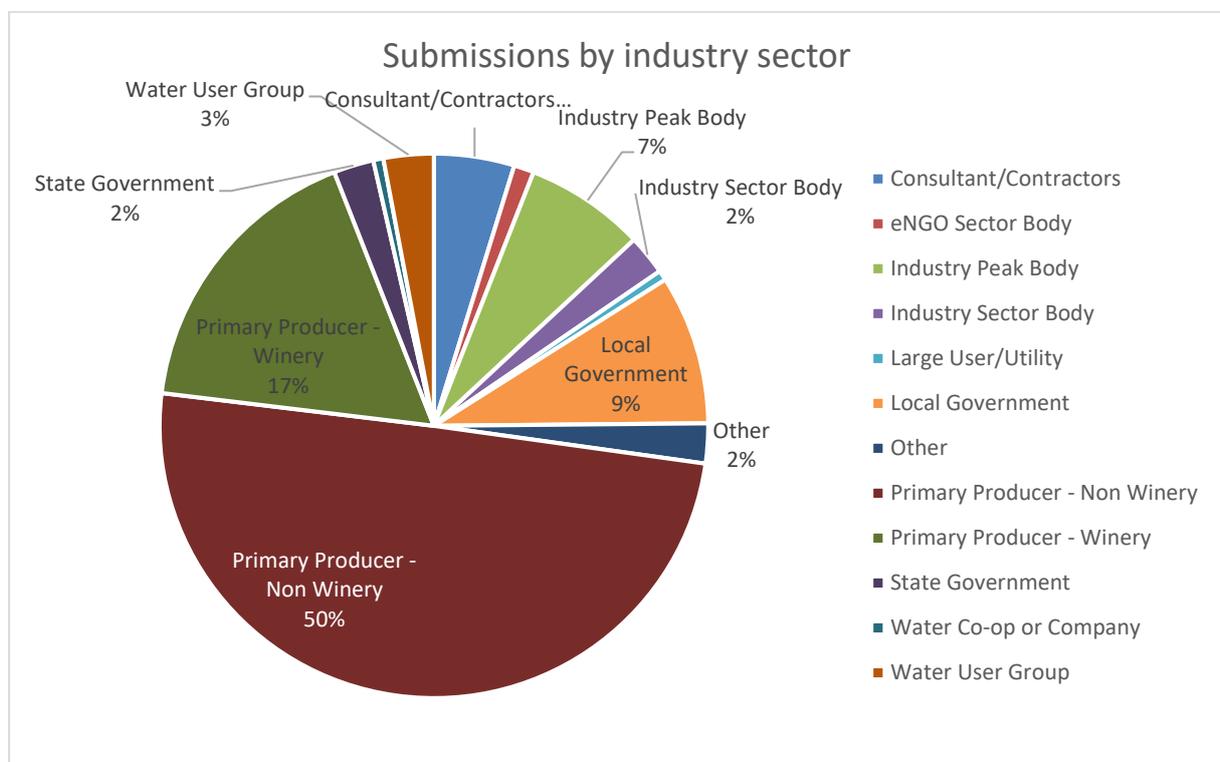
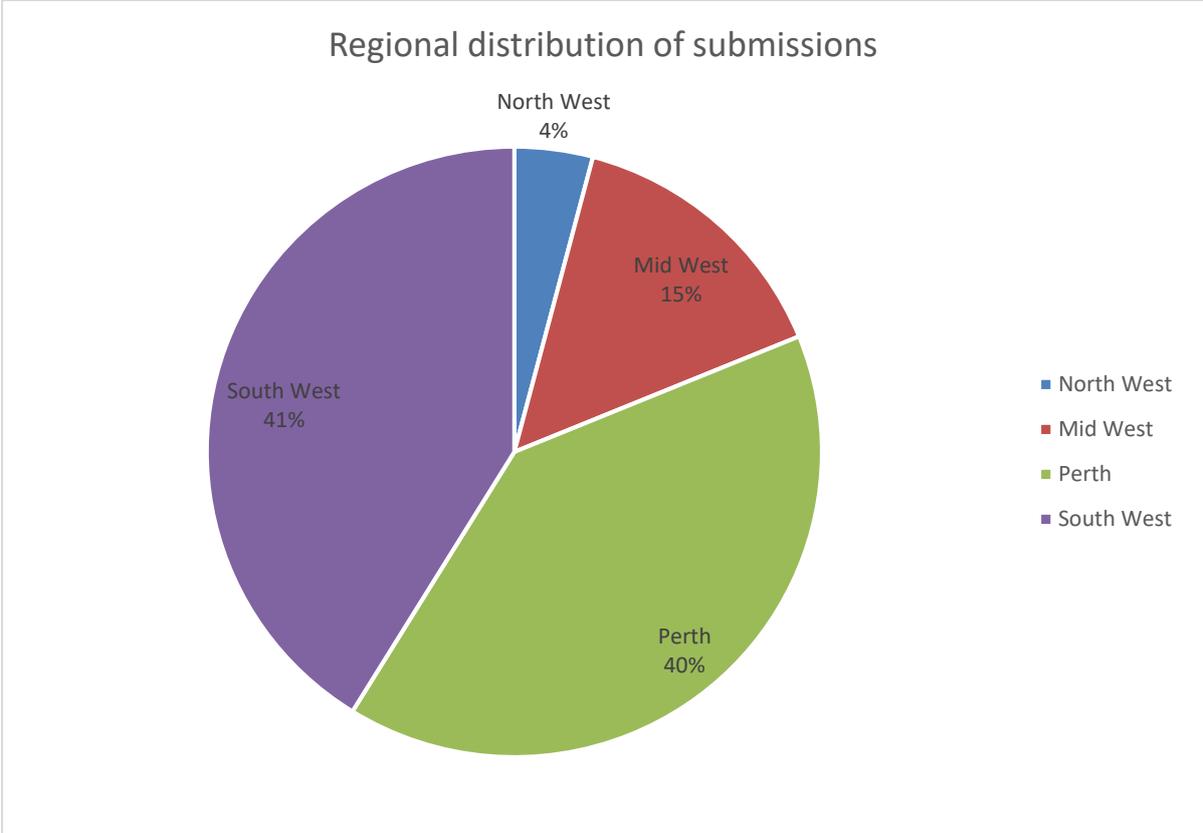


Figure 2: The regional distribution of those providing written submissions



## Workshop attendance

A total of 257 people attended the seven regional information and workshop sessions. Through the workshops the Department collated 449 responses which have been considered in this document. Primary producers were the majority of attendees across all workshops.

Figure 3: Attendance by industry sector to each of the seven workshops

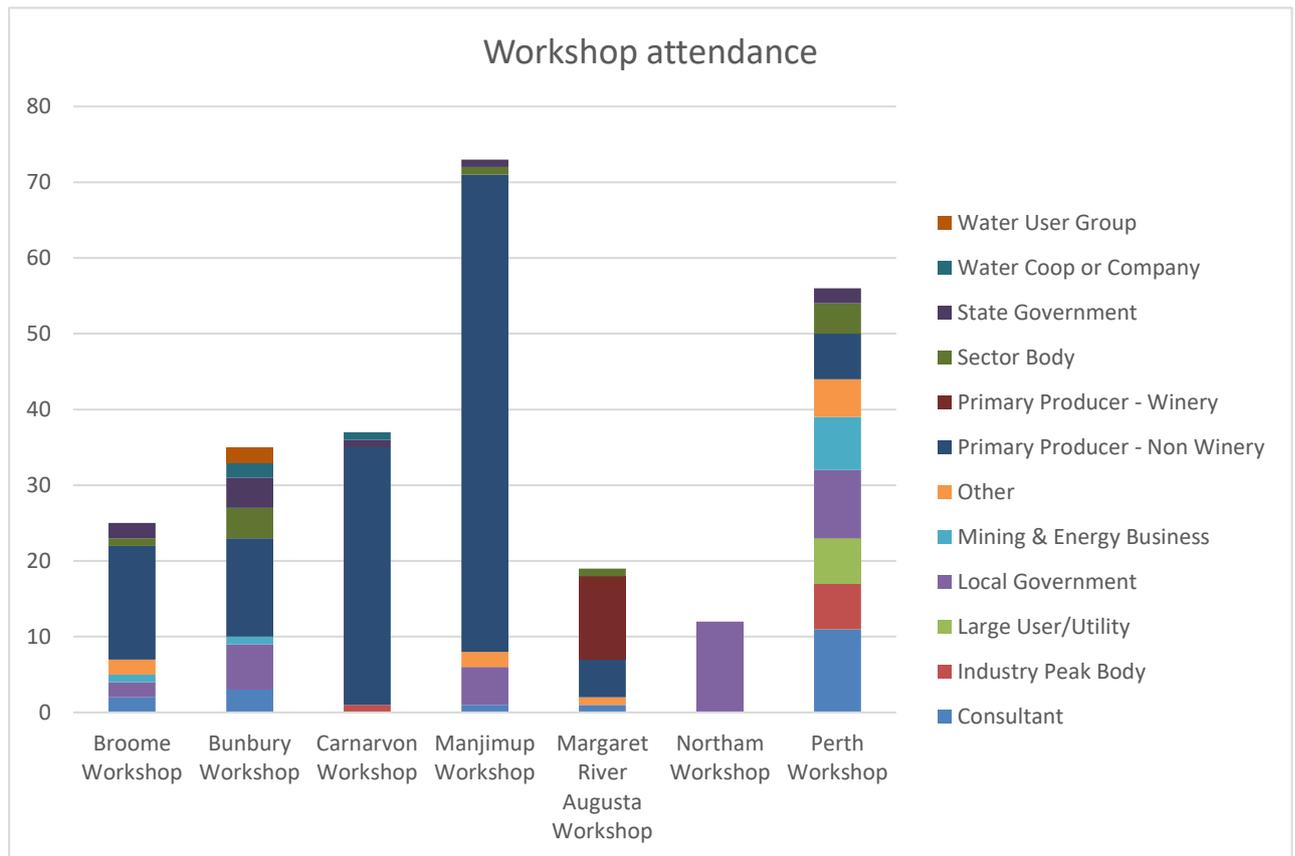


Figure 4: Industry sector representation across the seven workshops

