



# Summary of submissions on the proposed declared pest rates 2022/23

July 2022

Under the [Biosecurity and Agriculture Management Act 2007](#) (*BAM Act*) the State raises a declared pest rate (DPR) from landholders in specific areas and matches the funds raised from the rate dollar-for-dollar. The combined funds are made available to Recognised Biosecurity Groups (RBGs) who provide support to landholders to fulfil their obligations to manage widespread and established declared pests on their land. This funding supports RBGs to conduct pest management awareness initiatives and education, and to coordinate and undertake pest management activities. It does not remove the need and obligation for landholders to undertake declared pest management on their own lands. A community-led and coordinated approach is considered the most effective way to support landholders to manage these types of pests.

Each year the Minister for Agriculture and Food consults on the proposed DPR for the following financial year. Consultation requirements are set in section 130 of the BAM Act, and the Minister consults by inviting comment on the proposed rate in accordance with the [Biosecurity and Agriculture Management \(Declared Pest Account\) Regulations 2014](#) (the DPA Regulations). The Department of Primary Industries and Regional Development (DPIRD) administers the consultation process.

The proposed DPR for 2022/23 applies to specific land classes in certain prescribed Local Government Districts of Western Australia, which is owned or leased by 22,187 landholders.

## Invitation to comment

A Public Notice was published in *The West Australian* on Saturday 2 April 2022 inviting comment on the proposed 2022/23 DPR. The comment period ran from 2 April 2022 to midnight on Sunday 1 May 2022. The Public Notice was also published in 17 regional newspapers, *Farm Weekly* and *the Countryman* during the comment period.

In addition, the Public Notice and an explanatory letter were posted to 337 pastoral lease holders because the DPR for their areas was proposed to increase by 5% or more on the previous financial year's rate. Four taxable authorities will receive a rate notice for the first time on 2022/23 and so also received a copy of the Public Notice and an explanatory letter.

An invitation to make a submission was emailed to representatives of 94 key stakeholder organisations including local governments, RBGs, industry and natural resource management groups.

The Public Notice and an online submission portal were available on DPIRD's website during the comment period. The online submission survey captured basic information and enabled respondents to provide an open-ended comment.

## Summary of submissions

A total of 142 separate submissions were received and considered. It is likely that most of these came from landholders who pay the rate, although this cannot be confirmed because the process is open to the general public.

### Proposed Declared Pest Rate 2022/23

Submissions were categorised as 'supportive' or 'not supportive' of the proposed DPR for 2022/23 and/or the DPR in principle. A significant proportion of submissions (25%) did not clearly indicate if they did or did not support the proposed DPR.

Category	Submission No.
Supportive of proposed DPR	13
Not supportive of proposed DPR	94
Support for or against proposed DPR unclear	35
<b>Total</b>	<b>142</b>

Of the 337 pastoral lease holders who were posted a copy of the Public Notice and an explanatory letter, only seven made a submission. Six of these submissions were not supportive of the proposed rate increases, and one was unclear.

See Appendix 1 for an overview of submissions by proposed rate and prescribed areas.

### Response

The Minister for Agriculture and Food thanks respondents for taking the time to comment on the proposed rates for 2022/23. Although 22,187 landholders pay the rate, only 142 submissions were received.

The Minister acknowledges that support for the DPR varies across the State and between stakeholders.

The Minister has requested that the independent panel undertaking the statutory review of the BAM Act assess the role of the DPR and RBGs in supporting Western Australia's biosecurity efforts, and consider whether the current DPR-RBG model is fit-for-purpose. Interested stakeholders will have the opportunity to contribute to this review. A copy of this summary of submissions will be provided to the review panel.

The State considers it important to maintain stability in the revenue raised from the DPR, and matched by the State, while this review takes place.

### Other comments provided in submissions

Submissions contained a range of other comments related to the DPR and provision of funds to RBGs. While these comments do not directly relate to the proposed rate determination, they do provide the State with useful information for ongoing improvement of the DPR-RBG model and pest management in general. These comments are contained in Appendix 2.

## Appendix 1 – Support by proposed rate and prescribed areas

This section provides an overview of submissions by proposed rate and prescribed areas. The fourteen rates align with the [operating areas](#) of fourteen RBGs. DPIRD groups RBGs into three broad areas: Rangelands, Agricultural and Southwest.

To maintain anonymity of respondents where a small number of submissions were received, responses have been aggregated and reported for the Rangelands and Agricultural areas rather than against the individual rates proposed.

The following should also be noted:

- Total submissions across the tables do not equal 142, as five submitters did not state where they were from.
- Total landholders across the three areas does not equal 22,187 as some landholders own multiple properties across different areas.
- Percentages in the tables may not total 100% due to the rounding rule applied.

### Rangelands area

There are 337 landholders who pay the rate in the Rangelands area, of which 2.1% made a submission.

The table below provides an overview of submission support for the 2022/23 proposed rates a), b), c), d) and e) as listed in the [Public Notice](#) and in letters to pastoral lease holders. The proposed rates in this area align with the operational areas of the following RBGs: Carnarvon Rangelands Biosecurity Association; Goldfields-Nullarbor Rangelands Biosecurity Association; Kimberley Rangelands Biosecurity Association; Meekatharra Rangelands Biosecurity Association Inc.; and Pilbara Regional Biosecurity Group.

Category	Submission No.
Supportive of proposed DPR	-
Not supportive of proposed DPR	6
Support for or against proposed DPR unclear	1
<b>Total</b>	<b>7</b>

### Agricultural area

There are 6,249 landholders who pay the rate in the Agriculture area, of which 0.02% made a submission.

The table on the following page provides an overview of submission support for the 2022/23 proposed rates f), g), h), j), l) and n) as listed in the [Public Notice](#). The proposed rates in this area align with the operational areas of the following RBGs: Central Wheatbelt Biosecurity Association Inc.; Midland Biosecurity Group; Northern Biosecurity Group; Esperance Biosecurity Association; Southern Biosecurity Group; and Eastern Wheatbelt Biosecurity Group.

Category	Submission No.
Supportive of proposed DPR	1
Not supportive of proposed DPR	-
Support for or against proposed DPR unclear	-
<b>Total</b>	<b>1</b>

### Southwest area

The tables below provide an overview of submission support for the 2022/23 proposed rates i), k) and m) as listed in the [Public Notice](#). The proposed rates in this area align respectively with the operational areas of the following RBGs: Blackwood Biosecurity Group; Peel Harvey Biosecurity Group; and Leschenault Biosecurity Group Inc.

#### **Blackwood Biosecurity Incorporated (BBI)** - 2022/23 proposed rate i) as listed in the [Public Notice](#)

There are 4,709 landholders who pay the rate in the BBI operational area, of which 0.8% made a submission.

Category	Submission No.
Supportive of proposed DPR	2
Not supportive of proposed DPR	21
Support for or against proposed DPR unclear	15
<b>Total</b>	<b>38</b>

#### **Peel Harvey Biosecurity Group (PHBG)** - 2022/23 proposed rate k) as listed in the [Public Notice](#)

There are 8,219 landholders who pay the rate in the PHBG operational area, of which 0.8% made a submission.

Category	Submission No.
Supportive of proposed DPR	8
Not supportive of proposed DPR	44
Support for or against proposed DPR unclear	14
<b>Total</b>	<b>66</b>

**Leschenault Biosecurity Group Inc (LBG)** - 2022/23 proposed rate m) as listed in the [Public Notice](#)

There are 2,962 landholders who pay the rate in the LBG operational area, of which 0.8% made a submission.

<b>Category</b>	<b>Submission No.</b>
Supportive of proposed DPR	1
Not supportive of proposed DPR	19
Support for or against proposed DPR unclear	5
<b>Total</b>	<b>25</b>

## Appendix 2 – Other comments contained in submissions

Submissions contained a range of other comments related to the DPR and provision of funds to RBGs. While these comments do not directly relate to the proposed rate determination for 2022/23, they do provide the State with useful information for ongoing improvement of the DPR-RBG model and pest management in general.

Key themes were identified and these are summarised in the following tables, along with the corresponding number of comments. Not all submissions contained additional comments. Additionally, comments relating to multiple themes were identified in single submissions. As a result, the number of comments in the tables will not equal the total number of submissions received. Illustrative comments from submissions have been provided.

### Declared Pest Rate

DPR themes	No. comments	Comment examples
The DPR does not apply to all landholders/ regions of the State and is therefore unfair.	17	<i>“It is not fair to burden the land owner. Controlling my own weeds and pests assists everyone. All taxpayers should bear the burden so this levy should be paid by the not just the land owner.”</i>
DPR administration and collection process is unfair or heavy handed.	17	<i>“We are put under duress to pay it.”</i>
The rate chargeable is too high.	11	<i>“We own a small under 6 acres property and it is set to go up from \$45.00 to \$50.00 now while this may not mean much to you, it means a great deal to those who are on a pension.”</i>
The DPR could be applied to land in a different way.	11	<i>“Perhaps a per ha fee would be more appropriate, given the highly varied sizes of the properties in our Shire.”</i>
The current or historic rate consultation processes need to be improved.	10	<i>“Submissions contributed at the time were not consulted at all – the Tax was introduced with no Landowner respect or input.”</i>

## DPR-RBG model's effectiveness

Effectiveness themes	No. comments	Comment examples
The revenue raised is not being used effectively.	84	<i>"This levy produces no apparent measurable outcomes and appears to be little more than a hobby horse."</i>
The DPR-RBG model is not needed because landholders already manage pests.	47	<i>"I look after my own agricultural pests without need for [RBG]."</i>
RBG effectiveness or operations are criticised.	44	<i>"I am contributing funding towards a group, which has been largely ineffective, as well as having to outlay to control weeds and feral animals on my own property."</i>
Government and/or other private landholders are not doing enough to manage pests.	29	<i>"Government department lands and Shire roadside are full of declared weeds, we control weeds on our properties yet we are forced to pay this fee. It doesn't make sense."</i>
Concerns about the loss of Agricultural Protection Board.	20	<i>"Once, the state had an effective control program run by the Agriculture Protection Board (APB)."</i>
Compliance is not being used enough or effectively.	16	<i>"Put the onus back on the landholders and the shires. Fine those that do not take action to control weeds but don't penalise us farmers who do our own weed management."</i>
Positive views of RBGs' effectiveness or operations.	8	<i>"I believe that our local group are doing a good job with the resources available to them, and could be more effective if more land holders paid the rate."</i>

## Contact and more information

Email: [dpr@dpiird.wa.gov.au](mailto:dpr@dpiird.wa.gov.au)

Phone: 1300 374 731 (Choose option 9)

Web: <https://www.agric.wa.gov.au/bam/declared-pest-rate>