

In regard to the subject inquiry it would be appreciated if you could consider the following:

1. the concept of both a National Disability Insurance Scheme and a National Injury Insurance Scheme are supported

2. the proposal to obtain funding for the National Injury Insurance Scheme via Council rates is not supported. In that respect not all members of the community are property owners, some are multiple property owners, etc . Therefore the use of Council rates as a source would not result in equitable distribution. In addition Council rating structures are already complex and the addition of other components would not be well accepted by the community. In NSW rate pegging legislation applies ; accordingly, increases in rates can only be increased by approved levels. The addition, of additional amounts in rates will make the monitoring of allowable increases and the accountability of Councils' more cumbersome. Should a levy or other charge for the scheme be linked to rates then the emphasis on the scheme being a national/ state focus will be lost and there will be expectations on local government to explain and administer the arrangement- which will impose further burdens on Council resources.

The opportunity to comment on this matter is appreciated.

Yours Faithfully,

Brian Wilkinson
General Manager
Richmond Valley Council