

NTCOSS DISCUSSION PAPER

AUGUST 2017

Review of the Northern Territory
Pensioner Carer Concession
Scheme (NTPCCS)



About NTCOSS

The Northern Territory Council of Social Service (NTCOSS) is a peak body for the Social and Community Sector in the NT and an advocate for social justice on behalf of people and communities in the NT, who may be affected by poverty and disadvantage.

NTCOSS is a member of the nationwide Councils of Social Service (COSS) network, made up of each of the state and territory Councils and the national body, the Australian Council of Social Service (ACOSS). The membership of NTCOSS includes community based, not for profit service providers in the social welfare area such as consumer groups, indigenous and mainstream organisations and interested individuals.

NTCOSS' vision is for:

A fair, inclusive and sustainable Northern Territory where all individuals and communities can participate in and benefit from all aspects of social, cultural and economic life.

NTCOSS' mission is:

To promote an awareness and understanding of social issues throughout the NT community and to strive towards the development of an equitable and just society.

NTCOSS receives funding from the NT Government (Department of the Chief Minister).

NTCOSS Review of the Northern Territory Pensioner Carer Concession Scheme

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Overview – Review of the NTPCCS

The Northern Territory Council of Social Service (NTCOSS) welcomed the 2016 announcement by the Northern Territory Government (NTG) that it would conduct a review into the Northern Territory Pensioner Carer Concession Scheme (NTPCCS). NTCOSS, along with other groups, most notably seniors groups, has been calling for a review into concessions in the NT for some time. NTCOSS has subsequently been a member of the Expert Reference Group for the current NTPCCS Review.

NTCOSS notes here the key principles of the Review:

- 1. The purpose of the Scheme is to reduce the cost of living pressure for eligible seniors, pensioners and carers, and provide an incentive for seniors to remain in the Northern Territory during their retirement years.*
- 2. The reform will be based the most practical solutions to support seniors, pensioners and carers with cost of living issues, providing an equitable and accessible Scheme*
- 3. The Scheme will remain affordable and sustainable.*
- 4. Reducing the administrative burdens and operational costs of managing the Scheme.*

NTCOSS has had an extensive history in the concessions policy area, which is outlined in detail below. One of the critical issues that NTCOSS believes should be considered carefully is the nature and purpose of concessions.

NTCOSS believes that having ‘concessions’ for seniors intertwined with ‘concessions’ for pensioners and carers, veterans and some low-income households merges together different groups with different needs.

The NTPCCS currently has twofold aims, namely to:

- *Provide an incentive for members to stay in the NT during retirement*
- *Help all pensioners, certain categories of low-income earners and carers with a range of cost of living expenses (NT Government, 2017).*

These are valid aims – however, they are quite different and separate to the issue of providing cost of living relief for low-income and disadvantaged people, which is the aim of concession schemes across the country, and is the current second aim of the current NTPCCS.

Trying to accommodate the dual aims for two effectively distinct groups, using the same scheme (with the interstate travel concession being the only concession available to seniors only) clouds the issues around eligibility for concessions – and this may have played some part

in the decision by the former Northern Territory government to change the eligibility criteria for seniors in May 2014.

In this light, despite significant reservations about the potential introduction of a debit card for concessions in the NT, **NTCOSS broadly welcomes the specific proposal by the NTG, announced after the 2017 budget, to have a two tiered concessions scheme.**

NTCOSS believes, however, that the NTG should take this one step further by having seniors and other NTPCCS eligible members in two completely separate schemes. This could be done by adopting the general tenets of some of the recommendations made to the NTG by the NT Ministerial Advisory Committee for Senior Territorians (MAC-ST) in its 2015 submission on NT Seniors Concessions.

NTCOSS supports the broad notions of the first two recommendations from this committee to separate out seniors from pensioners and other groups who are currently eligible for the NTPCCS, and to ‘rebrand the seniors’ component of the current NTPCCS as *NT Seniors Incentives*. NTCOSS suggests that a form of means testing for the NTPCCS be implemented, but acknowledges concerns raised by MAC-ST in relation to the current use of the Commonwealth Seniors Health Card (CSHC) as the eligibility mechanism for the Scheme. The first two recommendations from the MAC-ST submission were:

Recommendation 1:

Separate the Seniors component of the current NTPCCS from the Pensioner and Carers components, to accurately reflect each target group’s distinctive nature and to reintroduce the long-term strategic purpose of the NT’s Seniors Concessions.

Recommendation 2:

Rebrand the Seniors component of the current NTPCCS as “NT Seniors Concessions” and associate the separate concession scheme (and membership card) with the NT Seniors Card, by co-branding and consistent design elements (NT Ministerial Advisory Committee – Senior Territorians, 2015, p.1).

Separating ‘seniors’ from the concessions scheme, would enable the benefits provided to seniors to be badged in a way that reflects their intent – i.e. as rewards or incentives, which are part of a broader package of supports to seniors in recognition of their past contribution to the Territory, as well as incentives to remain in the NT in the future.

The specific role that concessions are designed to play in addressing cost of living relief for low-income and disadvantaged Territorians (see next section) supports the need for one concession scheme which purely addresses cost of living relief, and a separate seniors scheme which reflects its distinct aim. Issues around eligibility and qualifying periods for the seniors scheme would be best addressed in consultation with seniors groups. Splitting the current scheme in this way would also make the process of ensuring fairness, equity and sustainability a much clearer task.

NTCOSS would however support the age eligibility for the separate seniors scheme being aligned with the age eligibility for the Age Pension – also recommended by the MAC-ST in its submission (Recommendation 4.2), that:

“The access age to the NTPCCS to be the same age as that for access to the Age Pension”, which would make eligibility to NT Seniors Concessions congruent to the access age to the Age Pension and subsequently increase the eligibility age at the same pace as that of the Age Pension” and substantially reduce costs to the NT Government.

History of the NTPCCS

The Northern Territory Pensioner and Carer Concession Scheme (NTPCCS) provides financial subsidies as concessions to members for a range of goods and services (NT Government, 2017).

Concessions help people on low incomes access important services such as water, energy, transport. The NTPCCS specifically aims to:

- Provide an incentive for members to stay in the NT during retirement
- Help all pensioners, certain categories of low-income earners and carers with a range of cost of living expenses (NT Government 2017).

The NTPCCS (the Scheme) was introduced in 1979 with the objectives of relieving cost of living pressures for low-income older Territorians, and to retain them in the community where they provide invaluable leadership and support (NT Government 2016c, Review Discussion Paper p.7).

Over the years, there have been changes to the scope and eligibility under the Scheme, which, while expanding the number of types of concessions available, has also resulted in differences in the way various concessions are administered and to whom (NT Government 2016c, Review Discussion Paper p.7).

Administration of each concession varies. Some concessions are indexed, while the value for others has not changed in many years. Some concessions are capped while others allow infinite concessional use.

The value of concessions ranges from 15 per cent of the full cost for some services to over 100 per cent for others (NT Government 2016c, Review Discussion Paper p.8).

Not all members of the Scheme are eligible for the travel concession, which is only available to those members not working and over the age of 65 (NT Government 2016c, Review Discussion Paper p.8¹).

¹ **Other concessions:** In addition to the concessions provided under the Scheme; seniors (persons over 60 years of age) and Scheme members receive a discount of \$10,000 on stamp duty when purchasing a property in the Northern Territory. This concession is administered through the Department of Treasury and Finance. Seniors Card holders (all Territorians over 60 years of age) receive a \$50 discount on annual motor vehicle registration on top of the concession allowed by the Scheme.

Concessions – eligibility and availability

What is a concession?

In its 2002 submission to the ACT concessions review, the ACT Council of Social Service (ACTCOSS) defined a concession as:

“A reduction, discount, subsidy, rebate, waiver or exemption provided by the government on the value of goods, services or associated fees to an individual, family, household or organisation. They are generally provided on the basis of low income, special needs or disadvantage, or some other special category such as age or war service” (ACTCOSS, 2002).

A range of federal and state government concessions and payments are made available to particular (eligible) households to assist with certain essential living costs, with most administered at the state or territory government level. Eligibility is often linked to prior eligibility to a Commonwealth concession card, or at other times is based on a means test or an income test (NTCOSS 2016a, p. 16).

Utilities, motor vehicle, transport and health related expenses (such as spectacles) constitute substantial and unavoidable expenditure item for households, and, “the various concessions are part of a societal framework intended to address cost of living pressures for particular groups in the NT” (NTCOSS 2016a, p. 52).

Such concessions are provided in addition to income support payments, while some people who are not on income support payments also qualify for some concessions.

Different concessions are structured in different ways and, “...the particular concession mechanism is important, as different methods for providing concessions can have different outcomes in relation to keeping pace with the cost of living (SACOSS 2014, p.6).

The Queensland Council of Social Service (QCOSS 2014, 15ff) has outlined a number of ways energy concessions are structured nationally and internationally – and while focused on energy concessions, the principles of how these concessions are structured may be broadly applicable to all concession types. A further example of a concession type highlighted by SACOSS is also mentioned.

Types of Concessions

Flat-payment concessions

Flat-payment concessions provide a discount off the bill of a set dollar amount for individuals or households who are eligible. Under such schemes, the value of the concession can reduce in real terms depending on the mechanism for increasing the payment over time (QCOSS, 2014), with some schemes not indexed.

The Northern Territory Patient Assistance Travel Scheme (PATS) accommodation subsidy is an example of a flat payment concession scheme, where the concession is not indexed, though there have been two increases over the past decade (a \$2 increase to \$35 in 2008, and a \$25 increase to \$60 in 2013 (NT Government, 2013b & 2016b).

The Northern Territory Electricity Rebate model (available for holders of the NT Pensioner and Carer Concession Card) has two components, one of which is a flat discount (currently \$1.268 per day) (NT Government 2016a, p. 36), taken off the fixed daily charge of \$0.5035 (Power and Water Corporation 2016a, p.2) (See also Percentage-based concessions below). Water concessions in the NT follow this same model.

Some jurisdictions have introduced a cap on rebates in an effort to prevent excessive usage being subsidised under the program (QCOSS 2014, p.20), however **the NT electricity and water concessions currently have no cap on usage.**

Percentage-based concessions

Percentage-based concessions are structured by having a percentage discount off the price of the goods or services, and have more chance of keeping up with price rises because the amount of the concession available goes up with any price increase.

Several advantages which have been documented by QCOSS (2014, p.20) in relation to percentage based concessions (related to energy, but relevant more broadly) include:

- The provision of “proportional assistance to households with different... usage.”
- The automatic provision of “additional assistance to help customers cope with large seasonal bills”
- The removal of the “need for an escalation mechanism as the concession automatically adjusts to changes in prices”

The Northern Territory electricity concession has two components – one of which is effectively a percentage based concession, as it provides a discount (\$0.091 per kW/h of usage or 35.6%) taken off the variable component of the electricity bill (\$0.255399 per kW/h), and the concession available increases with increases in usage (NT Government 2016a, p.36).

While there are advantages to the percentage based scheme, issues also exist. While the concession available increases as prices increase, so too does the contribution that the individual is required to pay for the service – so the impact of the concession isn't as clear cut as it may seem on the surface – especially if the rate of the price increased is above the rate of any payment increase a pensioner, or Newstart recipient, in particular, would receive (the latter's payments being pegged to CPI rises).

Income-based concessions

Income-based concessions are different from other concession types as they are based on a premise that expenditure should not exceed a certain proportion of income. This type of concession puts a cap on the amount payable by eligible customers with reference to their income (QCOSS 2014, p.23). This means an eligible household only pays up to a maximum set proportion of their income on an expenditure area – such as housing costs (QCOSS 2014, p.5).

An example from the NT of such a concession is public housing rent in remote areas being capped at various percentage levels depending on age of the tenant and the age/standard of the house. For example, a 'primary tenant' on the Age Pension is charged 14% of their income during the first year in a new house, which rises to 18% in the second and following years.

An 'other tenant or occupant' in a refurbished house, over the age of 18, on Newstart, will pay 10% of their income towards rent. There is also a maximum dwelling payable on rents to ensure that people living in overcrowded houses or dwellings are not disadvantaged because of their higher total household income (NT Government 2015a).

Income based concessions are an effective means of ensuring that households have the capacity to adequately meet their rental payments, and do not end up in housing stress (paying 30% or more of their household income on rent if in the bottom 40% of Australian income earners)². Income based concessions also provide equitable outcomes for different household sizes and different geographical and socioeconomic areas.

Concessions and payments indexed to CPI

SACOSS (2014, p. 7) highlights payments indexed to CPI, such as Income Support Payments (e.g. Newstart and Youth Allowance), and points out that as the prices of some expenditure items increase at a much faster rate than the generic CPI, it means that the value of these concessions and support payments is not maintained. For example, the 28.2% increase in the CPI for electricity in Darwin over the past five years is much higher than the 9% increase in the generic "All Groups" CPI for Darwin for the same period

² This is the definition of housing stress used by Tanton et al (2013), *The National Centre for Social and Economic Modelling (NATSEM)*

Commonwealth concessions, payable through Centrelink, such as Commonwealth Rent Assistance and the Utilities Allowance, are also indexed to the CPI (each March and September). Another concession, the Telephone Allowance, is indexed to the CPI once a year, in September.

A number of different concession methods are currently used in the NTPCCS.

Currently Available Concessions

Eligible members can receive concessions on a range of cost of living expenses including:

- electricity - on-grid, off-grid, pre-paid tokens and e-token meters
- water rates
- sewerage rates
- property rates
- garbage collection charges
- motor vehicle registration
- driver licences
- spectacles
- public transport
- interstate and overseas travel.
- Permanent residents of the NT who hold an eligible Department of Human Services or Centrelink concession card or an eligible Department of Veterans' Affairs concession card are eligible for concessions.

Prior to the changes to the NTPCCS in 2009, the electricity concession was based on an electricity charge rebate of 50 percent of the quarterly account, up to a maximum rebate of \$1.108 per day. This meant that the maximum a recipient could receive in one year was \$404.42.

The new scheme brought in a fixed daily concession, which at the end of 2016 was:

2.5 x the rate of the actual fixed daily charge = \$464 per year

(NB: even if the power isn't used in a house for a year (because the resident goes on holiday for 12 months, for example), that resident will still be gifted the \$464, which would more than compensate for the \$184 they would be required to pay for the fixed daily charges).

Current Eligibility for Concessions

Since 14 May 2014, new membership to the Scheme has been restricted to those people who have current Commonwealth Government issued concession cards in the following categories:

- Commonwealth Department of Human Services (Centrelink)
- Centrelink Pensioner Concession Card
- Health Care Card Low Income
- Centrelink Health Care Card
- Commonwealth Seniors Health Card, and or
- Department of Veterans' Affairs (DVA)
- Veterans' Affairs Pensioner Concession Card
- Health Card TPI (Gold)
- Health Card War Widow/er (Gold)
- Health Card - Pharmaceuticals Only (Orange) (NT Government 2017).

As at 1 January 2016, there were 24,831 registered members of the Scheme and 19,676 were active and claimed a concession during the 2015-16 financial year (ERG Agenda Item 5a).

The largest category of membership remains the 'seniors' category which contains those members grandfathered from prior to 14 May 2014. At 1 January 2016, in this category there were 18,318 members, or 74 percent of the total membership. Numbers in this group are currently declining at a rate of about five percent per year. There is a possibility that a substantial number of members registered as 'seniors' will be eligible under the categories listed above (NT Government 2016c).

The current concessions framework (which exists in a similar form across the country) is effective - even if some people access it more than others, and if some people don't know how to access. These issues (and the fact it is too generous for some, for some concessions) could be addressed in other ways, without fundamentally changing the existing system.

Concession Best Practice

Purpose and rationale behind concessions

Concessions in Australia have historically been introduced across states and territories in order to provide a rebate for low income households in order to ease cost of living pressures.

The provision of concessions is also linked to the taxation system in states and territories.

Public authorities (such as power and water corporations) provide a dividend (commonly referred to as a Public Authority Dividend) back to the owner of the goods or service (in this case the NT Government) through the form of GST which is applied to the user's bill.

Taxes on goods and services such as electricity and water are regressive – the higher the water or electricity charges, for example, the higher the GST component paid by a particular household, which represents a greater proportion of household income for low-income households. A concession then provides relief for eligible households (generally low-income households), by effectively compensating for the higher tax component they are contributing, and therefore mitigating the regressive nature of state/Territory taxes and charges.

The benefit of applying a percentage based method of providing concessions is that the concession adjusts as costs (and taxes) are adjusted either up or down. As the revenue from the GST component of charges rises, some of that is handed back in concessions to eligible households, which supports the durability and sustainability of such a concession scheme.

Concession principles from other jurisdictions

A number of other Councils of Social Service (COSSes) across the country have put forward some best practice principles when it comes to State/Territory and Commonwealth concession programs.

The South Australia Council of Social Service (SACOSS) (2009) outlined five key principles for concession schemes, which would be very useful principles for consideration by the Northern Territory government before any alterations are made to current concession regimes.

They are as follows:

Clarity — There needs to be a clear and publicly stated understanding of the target group for each concession. The social objectives and desired outcomes of all concessions need to be clearly and publicly stated, and the public consulted before the adoption of any new concession.

Equity — Both horizontal and vertical equity must be ensured by the concession: those in similar circumstances need to receive similar levels of benefit, and those in different circumstances need to receive different levels of benefit in order to reach similar outcomes.

Accessibility — Government needs to ensure the accessibility of all concessions in two ways: through proactive advertisement to eligible recipients, and through the provision of genuinely accessible concessions and concessionary services to all eligible recipients, regardless of geographical area.

Affordability — Concessions must make the good or service being provided genuinely affordable to recipients, and be indexed to reflect changing prices of essential goods and services.

Flexibility — Flexibility must be built into concessions in order to keep pace with changing economic and social practices, as well as prices. Relevant review mechanisms must be put in place to ensure that concessions remain relevant in terms of clarity, equity, accessibility and affordability”

Source: SACOSS 2009, p.ii.

Analysis of the NTPCCS against concession principles

It is a useful exercise to examine the current NTPCCS concessions against the SACOSS Principles on Concessions:

Clarity — While there is definitely clarity in relation to the target group for concessions (i.e. to keep *senior* Territorians in the NT), NTCOSS does not believe that this principle reflects the actual intent of concessions schemes, which should be about targeting cost of living relief to households most in need, which will include many low (to moderate) income senior Territorians. This area should form a significant part of the public review into the NTPCCS.

Equity — While the need for a cap on electricity and water concessions has been identified strongly in this paper, both the electricity concession and water concessions (from a structural point of view) do quite well in relation to the principle of vertical equity; with the percentage-based concession on per kilowatt hour and per kilolitre usage providing for different household sizes and differing needs.

A cap on concessions would strengthen this structure. In addition the level of concession for households using pre-paid electricity, reflects higher charge rates, and the higher cost of living in remote areas.

A further discussion must be had on whether both the current percentage based concessions for electricity (approx. 35%) and water (approx. 50%) need modifying; as well as the concessions on the fixed daily charge for electricity (approx. 2.5x the actual fixed daily charge rate), and water (nearly 1.2x the actual fixed daily charge rate).

These considerations will be important for the overall long term sustainability of the concessions scheme. In terms of horizontal equity, however, the Scheme does not achieve this – as it provides concessions to individuals such as pensioners, part-pensioners and self-funded retirees who receive at least \$438 per week (but potentially up to \$1000 per week) in income, but not to individuals who only receive \$268 or \$222 per week, or a sole parent with two children who receives \$558 per week (as shown in Figure 1 below).

Accessibility — In relation to the first component of this principle, more work could be done to ensure all people who would meet the eligibility criteria gain membership of the scheme; and also that all of those on the scheme maximise the benefits available.

Some concessions fare well against the second component of this principle, while others – especially the interstate travel concession - require improvement to ensure that the concession can be utilised by people who have no real need to travel interstate, but could benefit from a concession on intrastate travel.

Affordability — The substantial concessions provided for utilities certainly meet this principle; and would continue to do so even with a cap applied - as long as it is set at levels that would ensure cost of living relief for the lowest income households. *Please note comments under equity in relation to the current concession rates.*

Affordability is also achieved with free drivers' licence renewals, with \$1 public transport (where available), with free spectacles, as well as significant reductions (average \$263) where people can afford more expensive glasses.

Flexibility — Review and indexation mechanisms have been in place for some concessions under the NTPCCS – e.g. electricity, water and sewerage, but this has not been in place for all concessions in the NT – e.g. the Motor Vehicle Registration concession, which has not increased since July 2009.

Councils of Social Service Perspectives

The SACOSS principles echo many of the principles suggested as a result of the Federal Parliamentary Inquiry into concessions in the 1990s³. ACTCOSS (2002) and WACOSS (2007) have also drawn on the work of the Federal Parliamentary Inquiry to create their own 'checklists' of criteria for the concessions systems in the ACT and WA.

VCOSS argues that concessions are necessary to avoid the undesirable social outcome of bill shock. It has also identified that some existing concessions are complex and give vastly different outcomes to different households, and argues for concessions that give proportionate, consistent outcomes from an equity point of view.

VCOSS further suggests that concessions should be tariff-independent so that their value is not diminished by the peculiarities of any particular tariff structure (VCOSS 2011, p.1).

VCOSS (2011, p.2) also strongly argues that, "concession eligibility must be for people with low incomes," rather than what is the case in many other states/territories including the NT, where eligibility is fractured along the line of "deserving"/ "undeserving" (pension recipients - yes, allowance recipients - no). VCOSS makes the point that "concessions are to enable basic access to essential services for people who otherwise can't afford it.

All low-income people must be included, and VCOSS advocates for the using the Commonwealth's concession card assessments, to ensure universal criteria based on need (i.e. people with Pension, Health care and DVA cards) (VCOSS 2011, p.2).

VCOSS (2011) also suggests that "special needs households should be identified in a consistent manner based on the special need e.g. a benchmark for high usage, specific types of health conditions... though some types of needs may need more qualitative types of assessment". It also argues the need for consistency across jurisdictions (VCOSS, 2011, P.2).

SACOSS (2009, p.1) points to the need for, "flexibility in the creation and maintenance of individual concessions, as well as of making concessionary benefits fulfil the needs of the community as these needs change". It also highlights the need to understand "individual concessions as part of a system...indivisible from each other and the wider tax-transfer systems and social contexts."

³http://www.aph.gov.au/Parliamentary_Business/Committees/House_of_representatives_Committees?url=fca/concard/concardindex.htm

National Framework for Energy Concessions

ACOSS (2014, p.11) has advocated the need for a “national framework for energy concessions, which should set best practice benchmarks across jurisdictions, and allow flexibility for jurisdictions with distinct needs”. It has outlined several principles needed to meet these aims, namely that:

1. Concessions must be targeted to households in need of assistance
2. Payments and rates must be adequate to address energy needs and ensure energy affordability for households living on low incomes
3. A common list of medical equipment eligibility needs to be developed
4. A common list of eligibility for thermoregulatory illness needs to be developed.

ACOSS has also called for reform in the other areas to ensure people can meet their basic needs, including paying their energy bills. In particular ACOSS recommends reforms to Income Support (including raising the rate of Newstart) and “to improve the employment outcomes for people locked out of the labour market”, as well as to housing affordability (and it argues that it is hard to separate out energy policy from the impact of housing costs on a household budget). (ACOSS 2014, p.12). See also Appendix C of this report for the list of ACOSS recommendations.

ACOSS has highlighted the problem with flat payment concessions, which can be “badly targeted to certain households, for example they fail to discriminate between household size and costs related to regional location” (ACOSS 2014, p.9).

ACOSS has also highlighted the lack of consistency towards regularly reviewing concession payments to ensure they are keeping up with any cost of living rises – with many concessions lacking formal review mechanisms.

In this context ACOSS argues that, “the provision of the concession as a percentage provides an automatic indexation that resolves this issue’ (ACOSS 2014, p.9), and expresses particular concern regarding, “the high energy needs of families living on low incomes”.

This is a concern shared by NTCOSS.

Specific principles for energy concessions

VCOSS (2011, p.1) has identified that an energy concession framework should work towards four specific outcomes (some of which could be applicable to other concession areas):

1. Improving affordability: lower bills for eligible households
2. Additional help for special needs: assistance to reduce or offset unavoidable high consumption due to (for example) medical conditions
3. Addressing the underlying cause of unnecessary high consumption where this exists: programs to improve energy efficiency in low income households with high energy bills; and,
4. A last resort safety net: a grants program for households with unaffordable high bills or significant accumulated debt.

ACOSS (2014, p.7) has recently highlighted the flaws in existing concessions frameworks, including inconsistencies and inequities in the targeting of assistance, which have also been identified by a number of industry and community sector reports. While focused on energy concessions, some of the issues are pertinent to concessions more broadly.

At the April 2013 National Energy Affordability Roundtable at NSW Parliament House, held by ACOSS, in conjunction with the Energy Retailers Association of Australia and the Australian Energy Ombudsmen, “the lack of national consistency in the provision of energy concessions” and “the flaws in existing concessions frameworks, including inconsistencies and inequities in the targeting of assistance” were identified. A recommendation from the roundtable report was that the COAG Standing Council on Energy and Resources (SCER) should:

“...initiate a national review of energy concessions with a view to recommending a design for a nationally consistent framework and identifying an appropriate level of concessions.” (ACOSS 2014, p.7)

ACOSS (2014, p. 7) has identified the need to address horizontal inequities in concessions, and has also highlight that eligibility for some concessions is based on holding a Commonwealth Pension Concession Card (PCC), but excludes holders of a Commonwealth Health Care Card (HCC), “despite the fact that the majority of HCC holders have significantly less income than PCC holders”. This issue is very relevant to concessions available under the NTPCCS Scheme (where the majority of health care card holders are ineligible for the concessions scheme).

ACOSS (2014, p.9) has outlined objectives for eligibility reform, which include that “Eligibility criteria for concessions on energy consumption should be consistent across jurisdictions and should target households in most need”. ACOSS has also outlined objectives for adequacy reform including that: “Concessions on energy consumption should be adequate to reduce hardship and should remain so through indexation to energy prices” (ACOSS 2014, p.10).

Objectives for adequacy reform: ACOSS

In 2014, ACOSS proposed a two phase reform agenda

5.1 Phase One

ACOSS has identified the following issues that need to be addressed as a priority [including]

Proportional concessions are required in more jurisdictions to address the equity of concessions for consumers in areas with high supply costs (such as those regional network areas) and the high energy needs of families living on low incomes.

5.2 Phase Two

Phase two of reform should focus on the development of a national framework for energy concessions. The framework should set best practice benchmarks across jurisdictions, and allow flexibility for jurisdictions with distinct needs.

[Some of the] principles that would be required to meet these aims [include]:

1. Concessions must be targeted to households in need of assistance.
2. Payments and rates must be adequate to address energy needs and ensure energy affordability for households living on low incomes.

ACOSS (2014, p.11) also identified that further issues need to be addressed, in particular, “whether there needs to be explicit links made between the concession framework and jurisdictional energy efficiency initiatives”, which **NTCOSS believes would be a very worthwhile debate** (see section below on Energy Efficiency in housing).

NTCOSS History in Concessions Policy & Advocacy

Since 2009, NTCOSS has advocated (see Appendix A) for a widening of the eligibility to the NTPCCS to include those people most in need, as the NT does not extend the NTPCCS concessions to all people on Commonwealth Health Care Cards⁴.

As discussed above, currently people on the lowest incomes (e.g. Newstart – including sole parents caring for children; and people with disability⁵, and Youth Allowance recipients) do not qualify for the NTPCCS. For Newstart recipients with disability in the NT, not only do they receive \$170 per week less than what they would if on a pension, they are also denied access to the vital cost of living relief provided by concessions.

NTCOSS has also advocated for the need for planned and regular indexation to apply to all NTPCCS concessions where relevant (and in particular in relation to the Motor Vehicle Registration Concessions). Since 2009, NTCOSS has been calling on the NT Government to implement two major reforms to the NTPCCS Scheme; namely:

1. Extend the eligibility for membership of the NTPCCS to all Commonwealth Health Care Card holders
2. Establish inbuilt and timely review processes and planned indexation for all concession types

NTCOSS is concerned that proposed reforms of the NT Government will not extend the eligibility to those households on the lowest incomes who are most in need, nor will they be able to adequately address the issue of indexation of concessions with a one size fits all debit card approach, if implemented.

In addition, since July 2015, through its Cost of Living Reports (2015, No. 8, and 2016, No.14), **NTCOSS has been calling for a review of all concessions in the Scheme.**

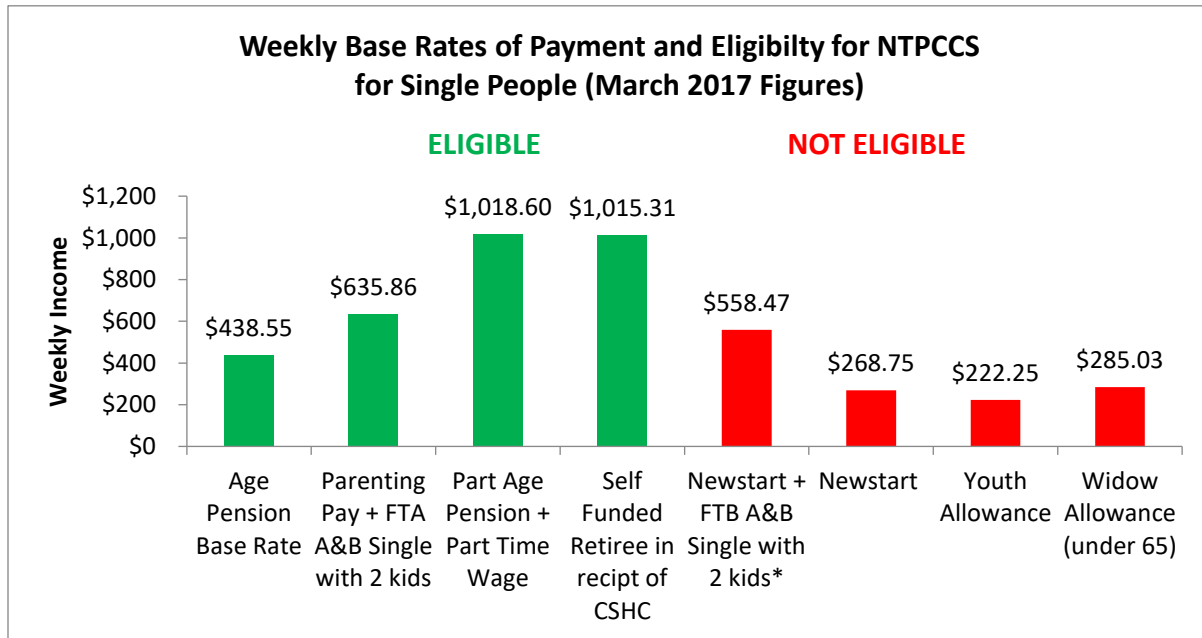
⁴ This refers to people on payments such as Newstart and Youth Allowance, not to be confused with the Commonwealth Seniors Health Card (recipients of that card are already eligible for the NTPCCS)

⁵ It is significant to note that one quarter of Newstart recipients have some type of disability, due to changes made by the then Federal Labor Government in 2011, when eligibility for the Disability Support Pension was tightened - Centacare (2017) 'Newstart becomes de facto disability pension for 25% of claimants'. Source: <http://www.centrecare.com.au/news/newstart-becomes-de-facto-disability-pension-for-2>

The push for expanding eligibility and adequate indexation

With the Queensland Government recently extending its electricity rebate (concession) to all Commonwealth Health Care Card holders, as well as asylum seekers, *the NT now remains the only jurisdiction (State or Territory) not to offer electricity concessions to all Commonwealth Health Care Card holders.*

Figure 1: Eligibility Criteria for the NTPCCS – lowest income earners not eligible



Figures derived from: Centrelink 2017 (based on figures at 19 March 2017); Fair Work Commission 2016

NB: For simplicity, some supplements & Rent Assistance are not included in Figure 1, as they can vary from person to person

*Conditions where a sole parent receiving Newstart may be eligible for a Pensioner Concession Card

Parenting Payment Single applies where the youngest child is under the age of 8. When the youngest child turns 8, single parents are then transferred across to the Newstart payment, expected to look for work – and due to being on the Newstart Allowance are no longer eligible for the NTPCCS, unless certain conditions apply – see below. In addition, their payment rate is reduced to the Newstart rate (approximately \$75 per week below what they would receive with Parenting Payment Single).

In relation to Newstart recipients receiving the ‘With dependent children rate’ of payment, and with children (over 8 and under 16), Centrelink does provide for the following:

“Single principal carers of a dependent child aged under 16 and people assessed as having a partial capacity to work may be eligible for a Pensioner Concession Card”.

This provision does not appear to guarantee access to a Pensioner Concession Card; and only applies to those with a partial capacity to work.

In Victoria a job seeker on Newstart can access electricity concessions, as well as motor vehicle concessions. If that job seeker moved to the Northern Territory, they would be ineligible for the equivalent concessions here. With the high costs of living in the NT well accepted, and the fact that payments for people on Newstart and Youth Allowance are indexed at a lower rate than pensions, people on these payments are hit with a 'triple whammy' in the NT by also being denied access to concessions that would help ease their cost of living pressures.

The argument for concessions in the NT to be extended to all Commonwealth Health Care Card holders (particularly electricity, water and sewerage concessions) has support at a national level.

SACOSS has pointed out this issue in relation to concessions generally, which it describes as, "...the disjoint between the benefits received by pensioners and those for which recipients of government allowances are eligible.

The fact that older Australians who hold a Pensioner Concession Card have access to many concessional benefits that are not available to other people on low-incomes means that horizontal equity in the systemic sense is lacking" (SACOSS 2009, p.8)

In addition ACOSS (2014) has recommended that the Commonwealth Utilities Allowance, "...be extended to recipients of Parenting Payment, Newstart and other allowances, who currently miss out" (cited in SACOSS 2009, p.8).

SACOSS (2009, p.8) has recommended concessions for telephone allowance, transport concessions, and the Pharmaceutical Allowance also be available to these allowance recipients.

Concessions: A National Snapshot

Concession schemes exist in all states and territories in Australia, and generally operate in broadly similar ways – either as a reduction in or waiver of fees or charges for eligible members. There are, however, differences in how each state and territory administers their schemes in terms of eligibility criteria, the type of concession applied e.g. flat-payment concessions, such as the \$154 reduction on motor vehicle registration in the NT, or percentage-based concessions, such as the electricity concession in Victoria which is calculated as 17.5% of the electricity bill. There are also jurisdictional differences in how, and how regularly, concessions are reviewed and indexed - which impacts on how well they keep up with rising costs of living.

State and Territory Concessions in the national context

It is critical that state and territory concessions are seen in the context of all concessions that might be available for households which are eligible. A number of concessions are available at both a Federal Level (e.g. Commonwealth Rent Assistance; Utilities Allowance), as well as at a state or territory level (e.g. ‘rebated rent’ through the public housing system, which is outside the scope of the NTPCCS in the NT).

This is an important consideration in relation to ‘equity’ and the best way to structure a scheme to assist households most in need. It is a reality that some households in the NT receive more concessions than other households – whether as total concessions, or in relation to a particular concession area, such as electricity. This does not necessarily mean that the Scheme is unfair.

There are of course access issues – if some people are missing out on concessions because they have not managed to get themselves on the scheme, or because they are not accessing all of the concessions that they are eligible for, then these are separate issues to address. Currently, for example, households using pre-paid power tokens are eligible for \$1140 per year in electricity concessions.

This may be a lot more than other households receive, but it reflects the fact that the rate of charge per kilowatt hour is higher for households with pre-paid meters, compared with standard meters. In addition living costs (food, petrol) are much higher in remote parts of the NT, where many households with pre-paid electricity reside (that often have larger than the average household occupancy) – compared with urban areas.

The current scheme caters for different levels of household use of electricity and water, for example, and this is appropriate given differing household sizes. While there are some issues with a number of households using excessive levels of electricity and water, and these issues need to be addressed, the current Scheme appropriately caters for different household consumption needs.

In addition, if an eligible member does not require a particular component of the concessions scheme e.g. spectacles concession, compensation in the form of additional concessions in another area is not warranted – as concessions are designed to provide cost of living relief where it is required.

Different levels of concessions are justified for different household's needs – rather than a one size fits all approach, which is being proposed by the NTG in relation to a debit card system, (to be discussed further below).

Homeowners may benefit more from the NTPCCS than renters, but renters may be accessing Commonwealth Rent Assistance, and can receive over \$3000 per year. This is far greater than the concessions generally received by homeowners in a year in relation to concessions for water, sewerage, rates and garbage (see scenarios on pages 37-40).

In addition, people in public housing may be saving thousands of dollars each year through the rebated rent provided by Territory Housing, compared to if they were renting privately.

Equity does not necessarily uniformity. NTCOSS doesn't suggest that the NTPCCS favours homeowners over renters, but is merely pointing out that equity must be examined from both a national and a state concession perspective. A one size fits all approach does not guarantee equity as such an approach cannot cater for different households sizes or for diversity in need.

In addition, with the NTG's proposed two tier system (and NTCOSS' proposed two separated schemes), households which would be eligible for the full suite of concessions in the future would in the main be households on relatively low incomes – whether homeowners or renters - which is appropriate targeting of a concession scheme.

National concession rates – comparison with the NT

The concessions rates in the NT are quite substantial when compared with other jurisdictions in Australia, and are a significant part of the social welfare framework in the NT, assisting in reducing cost of living pressures for many pensioners, carers, veterans and seniors across the NT (see Table 1).

Table 1: State Comparison of Concessions

Concession	NT	NSW	Vic	Qld	WA	SA	Tas	ACT
Electricity and or gas	\$827 (43% of av. cost), electricity only	Up to \$120 electricity and \$90 for gas	\$171 for electricity and \$62.40 for gas in winter	\$0.84 per day and \$69 for gas	\$100	Up to \$120	Up to \$300 gas plus electricity	Up to \$420 for electricity, gas and water (more in winter)
Property rates	67.5% up to \$200	50% up to \$250	50% up to \$213	20% up to \$200	Up to 50%	\$200	Up to 30%	50% up to \$700 cap
Water and sewerage	Water 60% sewerage 85%	Variable	50% up to \$299	Up to \$120	Up to 50%	30% up to \$295	Up to \$183	50%
Motor vehicle registration	\$154 (20%) + Seniors Card Holders extra \$50 discount	100%	50% insurance 100% registration	50%	50%	50%	45%	100% of registration but not third party
Driver licences	100%	100%	50%	50%	100%	50%	50%	100%
Spectacles	100%	Up to 100%	Eye test 100%, spectacles around 80%	Up to 100% for basic pair	\$50	Up to \$100	Up to 70%	\$200 every two years
Public transport	\$1 per trip. Up to 50%	Disabled 100%, others \$2.50	Small concession free on weekends	50%	60%	50%	50%	Over 70 and gold card free
Travel	Up to \$500 every 2 years	Concessions on Ferries and Intrastate Trains	Intrastate trains / Trams	Nil	Nil	Nil	Nil	Nil
Stamp Duty	\$10,000 discount on property purchases	TBA	TBA	TBA	TBA	TBA	TBA	TBA

Source: Table taken from NT Government 2016c, p. 10

Current NT Concession System

There is a wide range of concessions made available across the NT (see 1. History of the NTPCCS Scheme), with some more complex than others (e.g. utilities concessions with their variable components). There are different eligibility criteria for different concessions, with entitlements and eligibility not always easily understood by all, and concerns that some people are missing out on concessions for which they would be eligible (NTCOSS 2016a, pp.52-53).

There are reforms that could be made to the current system to ensure the scheme is targeted to those most in need, and that all people who meet the eligibility become members, and that all members gain maximum benefit from the Scheme.

As highlighted earlier, there is an issue with flat-based concessions (such as the NTPCCS Motor Vehicle Registration Concession) which have no clear system of regular indexation to enable them to keep up with rising living costs. As cited earlier, ACOSS (2014) has highlighted fundamental flaws with flat-payment concessions, which provides an argument for concessions like the MVR concession to become a percentage-based concession, which would then negate the need for indexation.

At the moment such concessions are subject to arbitrary increases, if any, when periodic reviews are done (if they are done at all). Percentage based concessions are generally preferable, as highlighted above, because as prices rise so too does the concession component, negating the need for indexation.

There are other aspects of the NTPCCS that need reform to ensure it is more equitable, including the interstate travel concession – which is available to some (but not all) NTPCCS recipients, by providing them with up to \$500 every two years to visit family or friends interstate, or even overseas – whether travelling by air, bus, rail or boat (or a combination of these), or private vehicle to an interstate or overseas destination.

This concession scheme is not currently flexible enough, however, to be extended for intrastate travel – which means, that people from remote communities, who might be struggling with dialysis treatment in a major centre, cannot access this concession to travel to Kintore, or Lajamanu, or the Tiwi Islands. They may have no need to take an interstate trip (if all their family are in remote parts of the NT) so this component of the scheme is of no benefit to them.

In 2010, the Country Liberals tabled a petition, calling on the Territory Government to reverse its decision to exclude intrastate travel entitlements from the Scheme. The Scheme was not changed, as the NTG argued that it would not be in keeping with the aim of the concession, which was originally brought in to “encourage seniors to remain in the Northern Territory during their retirement years by providing them a mechanism to maintain contact with friends and family who reside interstate and overseas.

This concession was later expanded to allow frail Territorians who find travel difficult, to use this concession to bring a family member or friend to the Northern Territory to visit them” (NT Government 2010).

Some other concessions are a concern because certain low-income population groups are excluded from eligibility (e.g. Commonwealth Health Care Card holders are excluded from the NTPCCS utilities concessions). In addition, there are a number of concessions that can only be used in certain geographic locations, such as the concession fare on public buses, as only Darwin, Palmerston and Alice Springs have traditionally had a public bus service (NTCOSS 2016a, pp.52-53).

There is a wide range of concessions made available across the NT with some more complex than others (e.g. utilities concessions with their variable components). There are different eligibility criteria for different concessions, with entitlements and eligibility not always easily understood by all, and concerns that some people are missing out on concessions for which they would be eligible (NTCOSS 2016a, pp.52-53).

How the current scheme works in practice

Concession Category	Engaging with specific concession	Ongoing effort required by member to access concession
Electricity - on-grid	Must provide NTPCCS concession number to Electricity retailer	Nil Automatically applied to bill
Electricity - off-grid	Present NTPCCS card when presenting receipts (if have own fuel generation)	Present NTPCCS card when presenting receipts; must provide block number and how many houses being supplied with fuel
Electricity - pre-paid tokens E-token meters (Top End only?)	Must indicate on NTPCCS application form if use pre-paid tokens and whether use wide or narrow tokens Indicate on NTPCCS application form	Nil – Tokens delivered to households 6 monthly
Water rates	Must provide NTPCCS concession number to Water retailer	Nil-Automatically applied to bill
Sewerage rates	Must provide NTPCCS concession number to Sewerage retailer	Nil-Automatically applied to bill
Property rates Garbage collection charges	Must provide NTPCCS concession number to relevant Council	Nil-Automatically applied to bill
Motor vehicle registration	Present NTPCCS card at time of claiming concession	Present NTPCCS card at time of paying bill (concession applied on the spot)
Driver licences	Present NTPCCS card at time of claiming concession	Present NTPCCS card at time of paying bill (concession applied on the spot)
Spectacles	Present NTPCCS card at time of claiming concession	Present NTPCCS card at time of purchasing spectacles (concession applied on the spot)
Public transport	Present at time of claiming concession	Show card when board public bus
Interstate and overseas travel	Present at time of claiming concession	<u>If booking through a travel agent;</u> members must present their NTPCCS card at time of booking <u>If booking themselves;</u> members must present their NTPCCS card when they go to NTPCCS office to claim concession (once trip complete); must provide tax invoice and provide bank bsb & account details

NTPCCS as an effective budgeting tool

Putting aside issues around the adequacy of or lack of indexation in relation to particular concessions (e.g. Motor Vehicle Registration concession), currently the NTPCCS provides concessions in a timely and efficient manner for its eligible members.

For the majority of concessions, the assistance (reduction in bill (utilities with standard meters); or no fee at all (e.g. Drivers' Licence) is applied at the time (or even before) the bill is due. This works as an effective tool in reducing cost of living pressures when the assistance is most required.

In the case of the (interstate) travel concession, members have the choice of going through a travel agent and having the concession applied immediately, or paying for the travel oneself, and being reimbursed once the travel has been completed. In the case of households using pre-paid electricity tokens, they are provided in 6 monthly allotments, and prospectively, rather than retrospectively. These households can therefore maintain a healthy supply of electricity.

The general application of concessions in a timely manner means that the concessions are a very effective budgeting tool – in the same way that people may choose the option of direct debit or centrepay deductions for managing a large range of household bills.

In addition, there is no discrimination attached to the application of automatic concessions, for example to an electricity bill, as this is the process whether someone is earning \$50,000 or \$10,000 per year.

The effort required by members to access most concessions (property rates and garbage concessions aside) is minimal, given that once they have supplied their NTPCCS Concession Card number to the relevant organisation, in most cases the concession is, or can be, automatically applied. This makes these concessions a very effective budgeting tool.

In the case of electricity water and sewerage, people do not have to remember what day a bill is due to have a concession applied, nor do they need to remember to have their concession card on them, or to remember a personal identification number (PIN) for a card, which could be the case if a debit card scheme was introduced.

Current structure of the NTPCCS utilities concessions

The 6 figures in Appendix B show the various components of the NTPCCS utilities scheme by tracking each concession as a percentage of the corresponding cost that the concession relates to. The following figures cover the period from 2008 (or 2009) until the end of 2016.

The actual rate of the Fixed Daily Charge (FDC) Concession for electricity has decreased in terms of a percentage of the fixed daily charge – but it has come down from a very high base. In 2008, the FDC concession represented approximately 350% of the actual FDC, whereas at the end of 2016, it represented 250%. However, this is one of the reasons that the rate of concessions paid for utilities has risen since 2008, as the concession is 2.5 x the actual charge.

In terms of the per kilowatt hour concession rate for standard meters, the concession rate has increased very steadily since 2009 from around 20% to 35%. As there is no cap on the concessions that a household can obtain, the continual increase in the concession rate has contributed to the current situation of some households receiving enormous concessions.

As far as prepaid electricity meters are concerned, the per kWh concession has gone from being 556% of the per kWh charge in 2008, to being around 1109% by December 2016 – almost double what it was in 2008 (see Table 2c in Appendix).

The FDC for water has followed a similar pattern to electricity, with the rate of concession for the FDC decreasing as a percentage of the FDC (since July 2010). At the same time the rate of the per kWh concession has increased as a percentage of the kL charge (since July 2010) but has plateaued over the last few years (Figures 2d and 2e).

For sewerage, the rate of concession for the Fixed Daily Charge has increased as a percentage of cost (Figure 2d), but this makes sense as it is the only component of the concession for sewerage, and helps the concession keep pace with the cost of living.

It appears that the increases in the variable component on the concession – i.e. the concession on the per kilowatt per hour for electricity and the concession on the per kilolitre consumption for water – have occurred in order to attempt to ensure the concessions keep up with increases in the corresponding charges. Establishing the most effective and sustainable utilities concession system into the future will require very careful consideration of the structure of, and interplay between, the fixed and variable rates of charges and concessions for both electricity and water.

See Appendix 2 for Figures 2a-2f, which highlight the changes in concession rates as a percentage of the charges, between 2009 and 2016.

Proposed NT Concession System Reforms

Map of proposed two tier scheme

Refer to attachment – NTCOSS Map of Concession Scheme

Concessions and income support

When examining the possibility of the introduction of a debit card for the NTPCCS, it is important to carefully consider the nature of concessions. Firstly, concessions are not a form of income support. Concessions are fundamentally different in nature to Income Support (Social Security) payments.

ACOSS (2014) states that, “social security for people with little or no private income is a fundamental obligation of Government. The social security system sits at the centre of a network of support services that are essential for people who need or provide care, and those seeking paid employment” (ACOSS 2014, p.5). Income support payments are paid to recipients on the basis that they meet appropriate eligibility criteria, and provided that they continue to meet certain obligations (e.g. regular reporting of activities, or notifying of changes in details). Generally recipients (unless subject to income management) are free to spend their income support as they see fit.

Concessions on the other hand, are provided to eligible households and targeted to specific expenses or bills, and generally tied to state or territory taxes, which are regressive in nature. Concessions are not paid in cash and it is at the discretion of the recipient as to what to spend the concession on. Concessions are paid as “reductions, discounts, subsidies, rebates, waivers or exemptions provided by the government on the value of specific goods, services or associated fees payable by an individual, family, household or organisation.

In short, concessions do not constitute discretionary expenditure areas in the way that an income support payment does. The way that concessions are currently structured in the NT, and in the other states and territories in Australia, represents well-targeted approaches by governments. *In addition, concessions in the NT are provided in a non-discriminatory and non-stigmatising manner – given that in many cases they are being automatically applied or provided, and are provided in the same way to all eligible recipients, regardless of whether recipients have high or low financial literacy and budgeting skills, and regardless of income level.*

The structure of the current scheme also reduces the steps and efforts required in paying bills for people who often have stressful and busy lives, or who may be ageing and/or have disability – so the scheme actually reduces stress and eases burdens. The automatic application of these concessions and the resultant benefits would cease with a debit card, which could be particularly complicated or stressful for some members – especially the elderly and some people with disability.

NTCOSS therefore supports adjustments to the current structure of the NTPCCS, rather than a radical overhaul. The adjustments recommended in this paper, and the attached ‘Map’ of the proposed Tier 1 and Tier 2 schemes, would strengthen the current scheme to ensure it meets the intent of a concession scheme in a targeted, efficient and fair manner.

Cost breakdown

Electricity, water, sewerage concessions represent the most significant proportion (almost three quarters) of the NTPCCS budget or **\$18.648m**

The other six categories of concessions (not including public transport) account for **\$6.958m**

Spectacles account for **\$1.317m** or 5% of the total NTPCCS budget

Approximately a quarter of NTPCCS members use more than the NT Household Power Consumption Average.

What incentives/community education programs can be implemented to encourage responsible use of power and water (both non-renewable resources within the NT's utility market)?

In **2013-14** the total cost of the NTPCCS was **\$28.229m**

Utilities (electricity and water) accounted for 72% of this

In **2014-15** the total cost of the NTPCCS was **\$29.506m**

Utilities (electricity and water) accounted for 78% of this

The most efficient way to make significant savings to the cost of the NTPCCS would be to impose a cap on electricity and water concessions.

Support for a cap has been highlighted in the past by NTCOSS as well as by the Ministerial Advisory Committee for Senior Territorians (2015, p.4) with the following recommendation:

“Action 5 - limit/cap the total power and water concessions per client/meter to the NT Household Power (and Water) Consumption Average...the method used to calculate the utilities concessions should not be fundamentally changed, but the concessions for power and water limited to average NT Household Consumption on a quarterly basis i.e. bill by bill, should be.”

Discussion: Debit Card System

Who would benefit/be worse off under a debit card scheme?

The following tables provide a range of scenarios showing what typical households may receive where certain conditions exist. These tables then allow for a comparison with concessions households currently receive vs. what they may receive under a proposed debit card scheme.

NB: The following scenarios use conservative estimates for electricity and water usage:

Table 2a Homeowner – single (using Metered Electricity)

Concession Category	Average Concession Paid (\$/yr) based on 2015-16 figures
Electricity (on-grid) – based on ¼ of ave. A/S usage	\$646.73
Property rates (Darwin/Alice Springs)	\$200.00
Garbage collection Darwin	\$46.25
Water rates (\$347/yr fixed + 1.9226/kL)	\$466.16
Sewerage	\$484.22
Motor Vehicle Registration	\$154.00
Driver licence	\$90.71
Prescription spectacles	\$131.81 (\$263.62 every 2 years)
TOTAL	\$2219.88

Table 2b Homeowner – couple (using Metered Electricity; and if both access MVR; licence; spectacles concessions)

Concession Category	Average Concession Paid (\$/yr) based on 2015-16 figures
Electricity (on-grid) Based on 3/8 of ave. A/S usage	\$738.18
Property rates (Darwin/Alice Springs)	\$200.00
Garbage collection Darwin	\$46.25
Water rates (\$347/yr fixed + 1.9226/kL)	\$524.30
Sewerage	\$484.22
Motor Vehicle Registration	\$308
Driver licence	\$181.42
Prescription spectacles	\$263.62
TOTAL	\$2745.99

Table 2c Renter – single (using Metered Electricity; and **not eligible for the Travel Concession)**

Concession Category	Average Concession Paid (\$/yr) based on 2015-16 figures
Electricity (on-grid) based on ¼ of ave. A/S usage	\$647.18
Motor Vehicle Registration	154.00
Driver licence	90.71
Prescription spectacles	131.81 per year (\$263.62 every second year)
TOTAL	\$1023.70

Table 2d Renter – single (using Metered Electricity; and eligible for Interstate Travel Concession)

Concession Category	Average Concession Paid (\$/yr) based on 2015-16 figures
Electricity (on-grid) based on ¼ of ave. A/S usage	\$647.18
Motor Vehicle Registration	\$154.00
Driver licence	\$90.71
Prescription spectacles	\$131.81 per year (\$263.62 every second year)
Interstate Travel Concession	\$250 (\$500 every two years)
TOTAL	\$1273.70

Table 2e Renter - couple (using Metered Electricity; and not eligible for the Travel Concession if both access MVR; licence; spectacles concessions)

Concession Category	Average Concession Paid (\$/yr) based on 2015-16 figures
Electricity (on-grid) Based on 3/8 of ave. A/S usage	\$738.18
Motor Vehicle Registration	\$308
Driver licence	\$181.42
Prescription spectacles	\$263.62
TOTAL	\$1491.22

Table 2f Renter - couple (using Metered Electricity; and **eligible** for Interstate Travel Concession; and if both access MVR; licence; spectacles concessions)

Concession Category	Average Concession Paid (\$/yr) based on 2015-16 figures
Electricity (on-grid) Based on 3/8 of ave. A/S usage	\$738.18 (average \$827.12)
Motor Vehicle Registration	\$308
Driver licence	\$181.42
Prescription spectacles	\$263.62
Interstate Travel concession	\$500
TOTAL	\$1991.22

Table 2g Renter – single (using Prepaid Electricity; and **not eligible** for the Travel Concession)

Concession Category	Average Concession Paid (\$/yr) based on 2015-16 figures
Electricity (on-grid)	\$1140
Motor Vehicle Registration	154.00
Driver licence	90.71
Prescription spectacles	131.81 per year (\$263.62 every second year)
TOTAL	\$1516.52

Scenario based on above tables:

Who will benefit from the proposed Debit Card Concession Scheme?

- People who are not currently NTPCCS members, but who would meet the full eligibility criteria, will be better off by \$1000 per year; however, they would generally be much better off if they entered the NTPCCS in its current form
- Seniors who did not meet the eligibility criteria when a change to eligibility was introduced in May 2014, will now be better off by \$350 a year
- Households where there are two seniors, who were previously ineligible, will be \$700 better off each year
- Renter – couple household (Not eligible for Interstate Travel Concession; and if both access MVR; licence; spectacles concessions) could be \$508 better off
- Renter – couple household (Eligible for Interstate Travel Concession; and if both access MVR; licence; spectacles concessions) could be \$8 better off

Scenarios based on above tables:

Who will be worse off under the proposed Debit Card Concession Scheme?

- Single NTPCCS member households who use electricity tokens, could be \$516 per year worse off. *(The majority of these households are on remote communities and Town Camps)*. Even if the electricity concession is the only concession they access, they would be \$140 worse off.
- Homeowner – single NTPCCS member household (using metered power) could be \$1219 worse off
- Homeowner – couple NTPCCS member households (using metered power, and if both access MVR; licence; spectacles concessions) could be approximately \$745 worse off
- Renter – single NTPCCS member household (using metered power) could be \$23 worse off
- Renter – single NTPCCS member household, who claims interstate travel concession (using metered power) could be \$273 worse off

Other implications:

- The Power and Water Authority and Jacana Energy are likely to be worse off, as the level of guaranteed income that the previous concessions scheme provided, will no longer be guaranteed
- Social service agencies who provide emergency relief will be under more pressure to assist families who are unable to meet all of their utility bill payments
- The introduction of a debit card would seem to make it impossible to have a staged introduction to some concessions (e.g. electricity) for people on Newstart and Youth Allowance – which has been one of NTCOSS' major messages re concessions since 2009.
- As well as this, it would make an indexation formula extremely difficult.

Pros and cons of a debit card system

While NTCOSS acknowledges that groups may believe they could be better off with a debit card, we believe that the risks and disadvantages outweigh the benefits. If the introduction of a debit card is about creating a fairer scheme and improving access to concessions for those with the greatest needs, we believe that there are some more efficient ways of achieving this (i.e. a cap on some concessions), without altering the overarching structure of the current scheme.

There are a number of overarching concerns with the introduction of a debit card for concessions, and the benefits of such a system - when compared with the current system - are difficult to find. The pros and cons of a debit card system are outlined in the following Tables.

Table 1. PROS

A debit card scheme could provide a greater rate of concessions for some groups of people, who are currently members, but not accessing any or all of the concessions that they are entitled to claim.

Comment: The gains from this are unknown – and there may be other ways to achieve this within the current scheme

A debit card could be administratively more efficient for the NTG

Comment: The costings are unclear. We do know that debit card type schemes can be hugely expensive (as outlined below), but NTCOSS acknowledges that the cost for running debit card concession scheme may not be this expensive. It is however, prudent to factor this into considerations.

Debit cards could be a very expensive exercise. In addition, the projected administration costs for 2017-18 (NTG, 2017-18) were \$372,276, which does not seem an unreasonable amount.

What we know about the costs of running other debit card systems, such as the Federal Government's Cashless Welfare Card Trail in Ceduna and the East Kimberley (currently costing around \$10,000 per participant) – the government is paying the debit card provider, Indue, at least \$7.9 million, while the Social Service Department's administrative costs are \$2.6 million, for 1850 participants currently (ABC 2017).

While the Federal Government is keen to increase the numbers of people in this program, which would bring down the costs per participant, the NT has a small population and costs for such a scheme will always be spread over a limited number of people – meaning limited economies of scale.

The costs of running the Centrelink income management scheme in the NT in 2012, cost between \$6,600 and \$7,900 a year to administer for each welfare recipient controlled by the scheme in a remote community (figures from the Australian National Audit Office reported in ABC (2013). There were 17,000 people in total on the scheme at that time. While actual costs of the basic (debit) card component of the scheme were not specifically highlighted – clearly these types of schemes are incredibly expensive to administrate.

Table 2. CONS

ELIGIBILITY

- Removal of Low Income Health Care Card holders from the Scheme (it appears this is the case from new information)
- This response does not provide concessions to those on the lowest incomes (e.g. Youth Allowance, Newstart recipients). The introduction of a debit card and will significantly reduce the possibility of a staged process of expanding the concession scheme to these groups who need it most*
- In addition, given that these recipients (Youth Allowance, Newstart) may come on and off these payments, the government will be unlikely to want to give them a pre-paid card.

**NOTE: The Queensland Government has just extended its electricity concessions to all Health Care Card holders and asylum seekers; as well as transport concessions to job seekers and asylum seekers. Such a change will be much harder in the NT if the concessions are lumped into one concession (debit) card, and not made as discrete individual concessions.*

PEOPLE WORSE OFF

- Many current concession recipients, who need the assistance of concessions the most, will be worse off with a limit of only \$1000 per year (debit card). In particular, single pensioner households who rent will be worse off, as will single pensioner and pensioner couple households who are homeowners (see scenarios)*
- Because people are on low incomes and generally in financial hardship all the time – there could be a higher risk of falling into debt with utility companies/inability to pay car rego etc.
- Potential for increased risk of electricity disconnections
- There is possible stigma attached to the use of a debit card
- Use of debit tracking systems – the NTG could arguably reduce the concession rate based on spending patterns. Privacy issues related to debit card tracking system
- **Q:** What happens if someone doesn't use all of the money on their debit card? Does it roll over to the next year; or does it return to the NTG?

**NOTE: Some pensioner couple households who rent may be better off under the new scenario - especially those not eligible for the interstate travel concession - but it must be noted that in all of the scenarios above, the electricity (standard meter) and water usage figures used are very conservative and may understate the impact of the change in the concession rates available.*

Table 2. CONS continued...

INDEXATION

A debit card would make indexation of concessions much more complex. In the current scheme, concessions are all directly linked to specific bills/expenditure areas. Price movements can be monitored – and indexation can be applied where required (even though the NTG has not indexed all concessions regularly). Having a debit card would remove this feature

BUDGETING TOOL

A debit card scheme would be setting people up to fail:

- The current NTPCCS is a very effective budgeting tool in that concessions are provided when they are most needed (i.e. at the same time as/or prior to a bill is due). All of the concessions can either be automatically provided, and this is a non-discriminatory approach - being applied to all recipients in the same way, regardless of income source or income levels or whether they have high or low financial literacy and budgeting skills. However, the automatic application of these concessions would cease with a debit card, which runs the risk of setting people up to fail
- The introduction of a debit card would, in fact, shift 'work' away from the NTG and back onto individuals. It opens up the possibility for people to forget to claim a concession for a particular bill, or if they forget to take their debit card with them or have misplaced or lost their debit card, it risks the concession not being used when most needed.
- The need for a Personal Identification Number (PIN) with a debit card may create another level of complexity for some elderly people or some people with disability
- It would work against the provision of cost of living relief all year round (setting people up to fail).

Table 2. CONS continued...

IMPACT ON UTILITIES PROVIDERS

- The current electricity water and sewerage concessions effectively underwrite Jacana Energy and Power & Water Corporation by \$18.6M (Page 35 of NTPCCS Review Discussion Paper).
- This amount would no longer be guaranteed under a Debit Card concession system - exposing the companies to debt risk, which could lead to a significant reduction in revenue, putting pressure on prices in the long term
- This could potentially lead to an increase in electricity disconnection
- With a cap on concessions the amount that Jacana is underwritten by the concessions will reduce, but there will still be guaranteed income through the concession scheme

IMPACT ON WELFARE AGENCIES

- If people are left worse off, there will be increased pressure on welfare agencies who provide Emergency Relief

IMPACT ON VEHICLE REGISTRATIONS

- Non registered vehicles could increase the number of cars on the road that are uninsured. This increases the risk for everyone. The public wears that risk.

RISK OF ELDER ABUSE and/or EXPLOITATION

- Depending on the way the debit card is designed – we would be concerned if a system allowed anyone to use the card – there would be a high risk of a debit card being used by someone other than the intended eligible recipient
- Likelihood of pressure on some debit card holders, especially elderly people. Risk of exploitation of ‘vulnerable’ people/risk of elder abuse

NATIONAL FRAMEWORK FOR ELECTRICITY CONCESSIONS

- Lessen the likelihood of there being a national framework for electricity concession schemes

POORLY TARGETED

- A debit card does not cater for different household size and diversity of needs– a household of 4 people will have higher bills but the same amount of concession as a household of 1 person who would have lower bills.
- If someone moves off income support and is no longer eligible (or if someone dies) – they could arguably have received and spent \$1000 concessions on day one of the (concession eligibility) year – and then shortly after no longer be eligible, yet all the funds have been spent. The current system prevents this as the concessions are applied on a pro-rata basis as needed).

APPENDIX A:

Timeline of NTCOSS' Policy & Advocacy Work on Concessions

2009 campaign on Electricity and Water Price Increases

NTCOSS Media Releases

7 April 2009

Battlers get an electric shock

22 April 2009

Insulate health card holders from electric shock - NTCOSS calls on NTG to extend concessions to all health-care card holders

15 October 2009

Power to the people - NTCOSS calls on the NT Government to extend concessions

NTCOSS Meeting with NTG

21 April 2009

NTCOSS met with Treasurer Lawrie. It was identified that the electricity price increases were "here to stay".

NTCOSS called on the NTG to broaden the concessions to all health care card holders rather than just pensioners.

NTCOSS Letters

27 April 2009

NTCOSS wrote to Treasurer Delia Lawrie, re NT Electricity and Water price increases, advocating for extending protection from these price rises to all Health Care Card Holders (those who are not currently entitled to any concessions).

2012 Campaign on Electricity and Water Price Increases

NTCOSS Media Releases

14 November 2012

Territory families cannot afford more electric shocks - NTCOSS urges NTG to rule out power cost increases for pensioners, health-care card holders

NTCOSS Letters

23 November 2012

NTCOSS wrote to Treasurer Lambley, regarding the many people doing it tough in the NT who are not eligible for the NTPCCS concessions (such as people on Newstart allowances). NTCOSS highlighted that the NT and QLD at that stage were the only states or territories which did not extend concessions to all people on a Health Care Card. NTCOSS encouraged the Treasurer to explore schemes to provide cheaper utility prices for those on lower incomes.

NTCOSS Reports on Concessions and Utilities

Cost of Living Report No. 1 – Utilities 14 October 2013

Highlighted that the NTPCCS concession does not cover all Health Care Card holders, while all other states, bar Queensland do (in QLD parents with children who receive Newstart are eligible).

Cost of Living Report No. 8 – Concessions 30 June 2015

Highlighted (again) that the NTPCCS concession does not cover all Health Care Card holders, while all other states, bar Queensland do (in QLD parents with children who receive Newstart are eligible. Argued the case for all Health Care Card holders to be included in the NTPCCS electricity, water and sewerage concessions (which would cover Newstart, Youth Allowance and other allowance recipients)

RECOMMENDATIONS

That the NTG makes changes to the NTPCCS in relation to electricity, water and sewerage concessions – including:

- Imposing a cap on concessions based on consumption levels (electricity and water)
- Extending the electricity, water and sewerage concessions to health care card holders

And that it:

- **Reviews the concession system in the NT as a whole** – by undertaking a comprehensive review of all Territory-based concessions to determine if they are meeting the aims for which they were established, i.e. reducing cost of living pressures for lower income Territorians; and to establish a consistent approach across all concessions in terms of reviews and indexation methods.

MEDIA RELEASE

30 June 2015

NT concessions not keeping pace with price changes

Highlight that some low income households are excluded from some concessions – e.g. Commonwealth Health Care Card holders are excluded from utilities concessions

**Cost of Living Report No. 14 – Concessions
15 December 2016**

Highlighted that the NT Government must ensure that the NTPCCS system is a sustainable one and that those who are most in need can access the concessions, and that it will be crucial to ensure that all NTPCCS concessions have inbuilt and timely review processes and planned indexation, to ensure they can continue to keep up with rising costs and to provide effective support to eligible Territory households.

RECOMMENDATIONS

That the NT Government makes changes to the NTPCCS in relation to electricity, water and sewerage concessions – including:

- Imposing a cap on concessions based on consumption levels (electricity and water)
- Extending the electricity, water and sewerage concessions to all health care card holders; and,
- Undertakes consultation with consumer groups – e.g. low-income groups, people with disability, seniors and groups representing seniors, about any changes to the scheme

MEDIA RELEASE

15 December 2016

NT concessions not keeping pace with price changes

Highlight that some low income households are excluded from some concessions – e.g. Commonwealth Health Care Card holders are excluded from utilities concessions

NTCOSS Submissions on Concessions and Utilities

NTCOSS 2013 Submission to the Committee on the Northern Territory's Energy Future Inquiry into Electricity Pricing Options (Legislative Assembly of the NT, 12th Assembly)

This submission highlighted that the NT, along with Queensland, were at the only two jurisdictions which did not extend electricity concessions to health care card holders (meaning job seekers on very low payments (Newstart and Youth Allowance) are ineligible for the concession).

APPENDIX B: Current Structure of NTPCCS Utilities Concessions

The following 6 figures examine the various components of the NTPCCS utilities scheme by tracking each concession as a percentage of the corresponding cost that the concession relates to. The following figures cover the period from 2008 (or 2009) until the end of 2016, and are taken from NTCOSS (2016 pp. 60-62 (Appendix D))

Figure 2a: Electricity (Standard Meter) Fixed Daily Concession as a proportion of Fixed Daily Charges

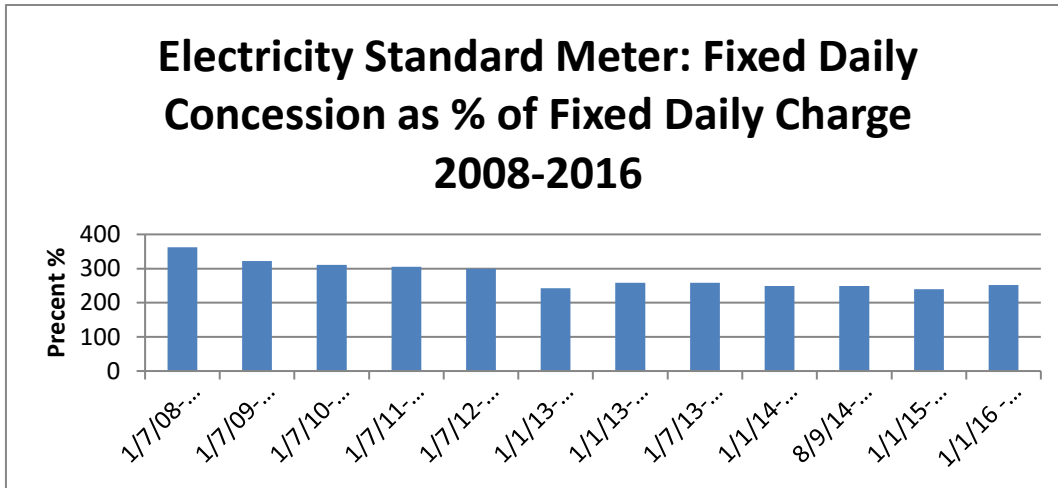


Figure 2b: Electricity (Standard Meter) Concession as a proportion of Fixed Daily Charges

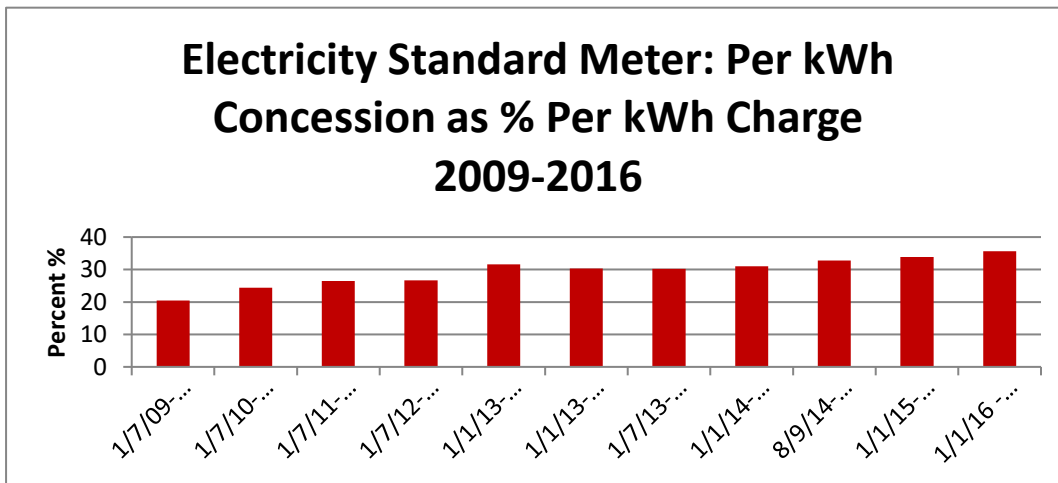


Figure 2c: Electricity (Prepayment Meter) Fixed Daily Concession as a proportion of Fixed Daily Charges

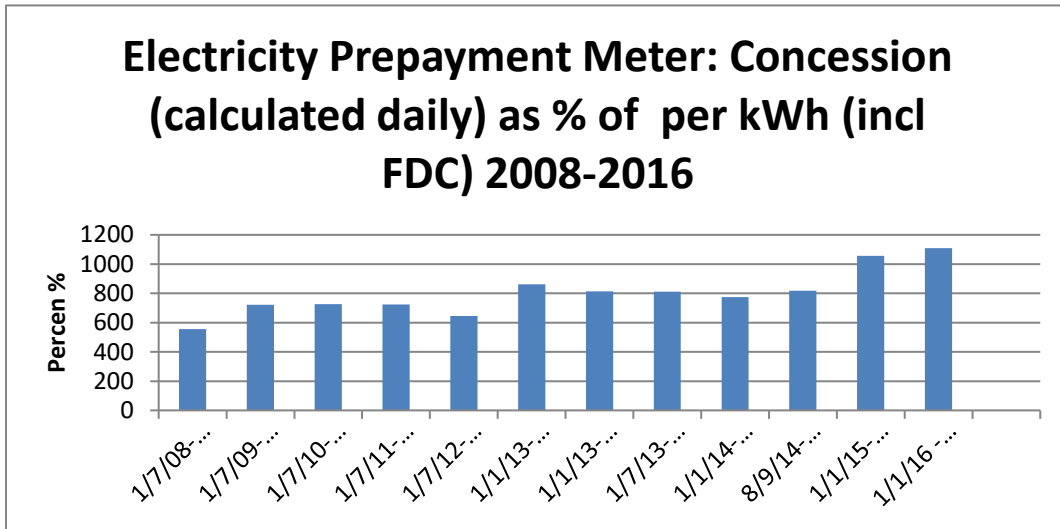


Figure 2d: Water Fixed Daily Concession as a proportion of Fixed Daily Charges

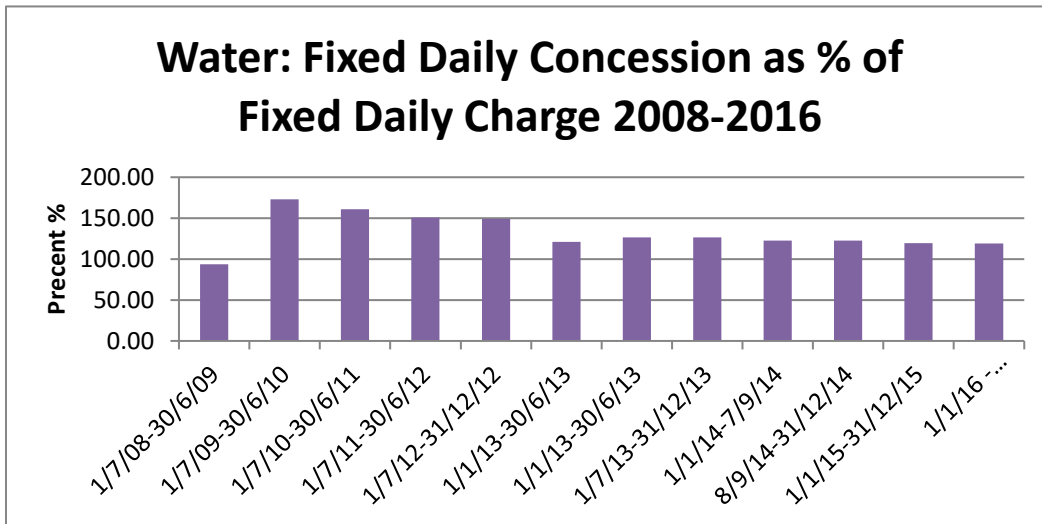


Figure 2e: Water per kL Concession as a proportion of kL charge

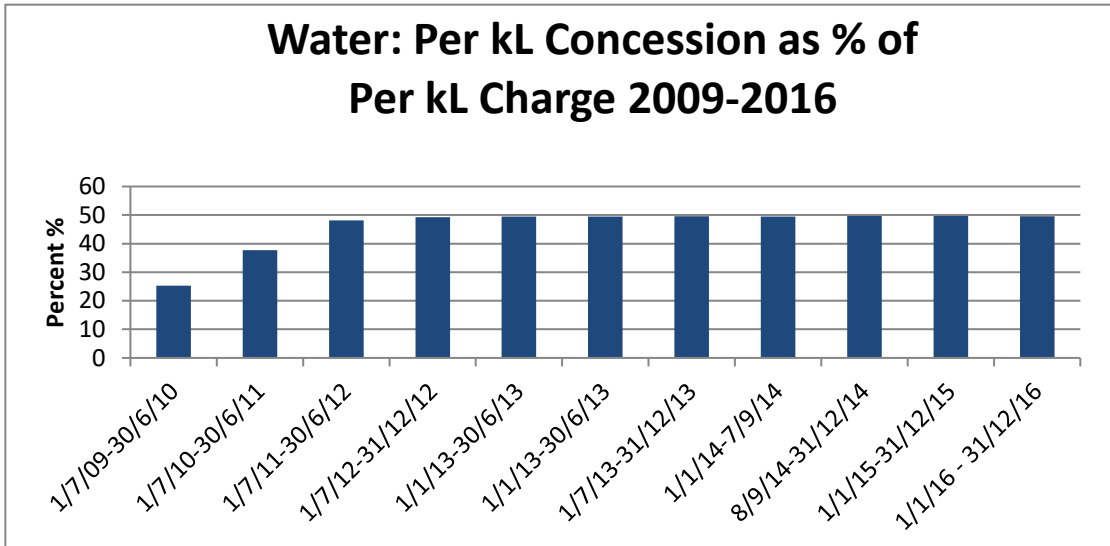
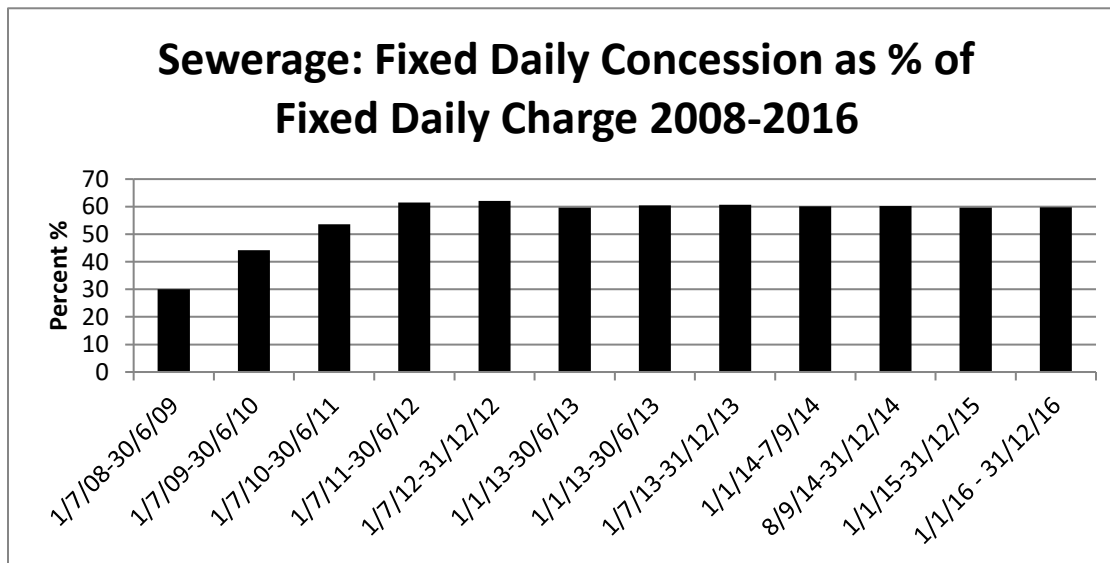


Figure 2f: Sewerage Fixed Daily Concession as a proportion of Fixed Daily Charges



Source: Electricity, Water & Sewerage rates from: Power and Water Corporation 2009, 2010, 2011, 2012, 2013a, 2013b, 2013, 2014a, 2014b, 2015a, 2015b, 2016a, 2016b; Concession rates from: Internal NTCOSS document (NT Utilities Concessions – Historical rates); NT Government 2015j and 2016a

It appears that the increases in the variable component on the concession – i.e. the concession on the per-kilowatt per-hour for electricity and the concession on the per kilolitre consumption for water – have occurred in order to attempt to ensure the concessions keep up with the corresponding charges. Establishing the most effective and sustainable utilities concession system into the future will require very careful consideration of the structure of and interplay between the fixed and variable rates of charge’s and concessions for both electricity and water.

REFERENCES

ABC 2013, ABC Online Article Welfare income management comes at a cost, Melanie Arnost, Updated 31 Jan 2013, 3:11pm – ABC Website Accessed 26 May 2017

<http://www.abc.net.au/news/2013-01-31/welfare-income-management-costs-report/4494054>

ABC 2017, ABC Online Article 'Centrelink cashless welfare card trial costing taxpayers \$10,000 per participant' Dan Conifer (Political Reporter), Updated 2 May 2017, 8:17am – ABC Website Accessed 26 May 2017

[http://www.abc.net.au/news/2017-05-02/cashless-welfare-trial-costing-taxpayers-\\$10k-per-participant/8488268](http://www.abc.net.au/news/2017-05-02/cashless-welfare-trial-costing-taxpayers-$10k-per-participant/8488268)

ACOSS 2014, Payment adequacy: a view from those relying on social security payments

ACTCOSS 2002 Australian Capital Territory Council of Social Service (ACTCOSS) (2002), 'ACTCOSS Submission on ACT Government Concessions', Australian Capital Territory Council of Social Service, Canberra, July 2002.

Centrelink 2016, *A Guide to Australian Government Payments*, released quarterly, 20 September – 31 December 2016, Australian Government, Canberra,

Fair Work Commission 2016, Fair Work Commission Website, accessed 21 November 2016

<http://www.fairwork.gov.au/>

Ministerial Advisory Committee for Senior Territorians (MAC-ST) 2015, Submission on NT Seniors Concessions, 20 October 2015, Darwin NT.

NTCOSS 2009a, Media Release, 7 April 2009 Battlers get an electric shock

NTCOSS 2009b, Media Release 22 April 2009 Insulate health card holders from electric shock – NTCOSS called on the NT Government to extend concessions to all holders of health-care cards

NTCOSS 2009c, Media Release, 15 October 2009 Power to the people – NTCOSS call on the NT Government to extend concessions to disadvantaged Territorians receiving payments such as Newstart Allowance and Parenting Payment Single.

NTCOSS 2009d Correspondence with Treasurer, 27 April 2009, Letter to Treasurer, The Hon. Delia Lawrie; and 21 April 2009, Meeting with Treasurer Lawrie

NTCOSS 2012a Media Release November 2012 Territory Families cannot afford more electric shocks NTCOSS urged the Government to rule out any increase in power costs for pensioners, health care card holders

NTCOSS 2012b, Correspondence with Treasurer, 23 November 2012, Letter to Treasurer Lambley,

NTCOSS 2013a, Cost of Living Report No.1, Utilities, 14 October 2013

NTCOSS 2013b, Submission To the Committee on the Northern Territory's Energy Future Inquiry into Electricity Pricing Options (Legislative Assembly of the NT, 12th Assembly), Darwin NT.

NTCOSS 2015a Cost of Living Report No.8, Concessions, 30 June 2015

NTCOSS 2015b, Media Release 30 June 2015, 'NT concessions not keeping pace with price changes

NTCOSS 2016a Cost of Living Report, Issue 14 Concessions and the Cost of Living, Darwin NT.

NTCOSS 2016b Media Release 15 December 2016, 'Calls renewed to increase Newstart and extend concessions to all Health Care Card holders in the Northern Territory: NTCOSS report'

NT Government 2010, LEGISLATIVE ASSEMBLY OF THE NORTHERN TERRITORY **Petition** Registration No. 48 Title INTRASTATE TRAVEL ENTITLEMENTS FOR NT PENSIONER CONCESSION AND CARER SCHEME, SENIOR CARD HOLDERS, Presented on 1 December 2010

NT Government 2013a, NT Government Media Release, The Hon. John Elferink, MLA, Acting Minister for Transport, 3 January 2013.

NT Government 2013b, NT Government, Department of Health, Review of the Patient Assistance Travel Scheme July 2013

NT Government 2015a, Remote public housing rent (Fact Sheet), updated 9/12, from website, 28 Nov 2016. https://housing.nt.gov.au/__data/assets/pdf_file/0018/138222/rfs37_remote_rent_Sep12.pdf

NT Government 2016a, Northern Territory Pension and Carer Concession Scheme (NTPCCS) Policy Manual – Attachment D, Website accessed on 25 November 2016. http://www.health.nt.gov.au/library/scripts/objectifyMedia.aspx?file=other/97/88.docx&siteID=1&str_title=NTPCCS%20Policy%20Manual.docx.

NT Government 2016b, Department of Health, Patient Assistance Travel Scheme PATIENT TRAVEL ADVICE, 2016.

NT Government 2016c Review Discussion Paper

NT Government 2017, Website, NT Pensioner and Carer Concession Scheme Webpage, Accessed 21 May 2017 <https://nt.gov.au/community/seniors/nt-pensioner-and-carer-concession-scheme/introduction>

NT Government 2017b NORTHERN TERRITORY CONCESSIONS REVIEW, THE CURRENT SITUATION Fact Sheet May 2017, Website accessed on 26 May 2017 https://territoryfamilies.nt.gov.au/__data/assets/pdf_file/0006/423375/Fact-Sheet-NT-Concessions-Review.pdf

Power and Water Corporation 2009 'How much does it cost for water, sewerage and electricity? Tariff brochure, Tariffs as at 1 July 2009, Darwin, NT.

Power and Water Corporation 2010 'How much does it cost for water, sewerage and electricity? Tariff brochure, Tariffs as at 1 July 2009, Darwin, NT.

Power and Water Corporation 2011, 'How much does it cost for power, water and sewerage? Tariff brochure, July 2011, Darwin, NT.

Power and Water Corporation 2012, 'How much does it cost for power, water and sewerage? Tariff brochure, July 2012, Darwin, NT.

Power and Water Corporation 2013a, 'How much does it cost for power, water and sewerage? Tariff brochure, 1 Jan 2013, Darwin, NT.

Power and Water Corporation 2013b, 'How much does it cost for power, water and sewerage? Tariff brochure, Updated 18 March 2013, Darwin, NT.

Power and Water Corporation 2013c, 'How much does it cost for power, water and sewerage? Tariff brochure, Effective 1 July 2013, Darwin, NT.

Power and Water Corporation 2014a 'How much does it cost for water, sewerage and electricity? Tariff brochure, Effective from 1 January 2014, Darwin, NT (up to 30 June for water & sewerage; upto Sept 7 for electricity tariffs).

Power and Water Corporation 2014b 'How much does it cost for your water and sewerage? Tariff brochure, Effective from 1 July 2015, Darwin, NT.

Power and Water Corporation 2015a 'How much does it cost for water, sewerage and electricity? Tariff brochure, Effective from 1 January 2015, Darwin, NT.

Power and Water Corporation 2015b 'How much does it cost for water, sewerage and electricity? Tariff brochure, Effective from 1 July 2015, Darwin, NT.

Power and Water Corporation 2016a 'How much does it cost for water, sewerage and electricity? Tariff brochure, Effective from 1 January 2016, Darwin, NT.

Power and Water Corporation 2016b 'How much does it cost for water, sewerage and electricity? Tariff brochure, Effective from 1 July 2016, Darwin, NT.

QCOSS 2014, *Energising concessions policy in Australia Best practice principles for energy concessions, May 2014*

QCOSS 2017, Media Release, Concessions available for more people!, April 2017, QCOSS Website. Accessed 21 May 2017. <https://www.qcoss.org.au/concessions-available-more-people>

SACOSS 2009, Concessions *shift the focus to equity* SACOSS Principles Paper No. 2 July 2009

SACOSS 2014, South Australian Council of Social Service (SACOSS), Cost of Living Update No. 17 December Quarter 2013, (Concessions)

VCOSS 2011, National Concession Principles (Unpublished)

WACOSS 2007, Western Australian Council of Social Service, 'Review of the Administration and Management of State Government Concessions: Western Australian Council of Social Service Response to Issues Paper', November 2007.