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25 October 2021

Native Vegetation Strategy  
Department of Water Environmental Regulation  
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Submitted via email – [nvs@dwer.wa.gov.au](mailto:nvs@dwer.wa.gov.au)

### **Native Vegetation in Western Australia – Consultation Draft**

1. This letter sets out feedback from Co-operative Bulk Handling Limited (**CBH**) to the Department of Water and Environmental Regulation (**Department**) in relation to its “*Consultation Draft: Native Vegetation policy for Western Australia*” (**Consultation Draft**) which was released for public comment in August 2021.
2. This letter supplements the previous feedback from CBH to the Native Vegetation Issues Paper submitted on 10 February 2020. For the purposes of this letter, CBH has limited its responses to those issues in the Consultation Draft that are relevant to CBH’s operations.

### **Response to Consultation Draft questions**

***Question 1: Has the policy’s context adequately covered native vegetation values, opportunities and challenges?***

3. Given CBH’s extensive operations in regional WA, particularly the Wheatbelt region, CBH believes it is critical to ensure that the State Government’s native vegetation policy strikes the right balance between environmental, economic, social and cultural outcomes.
4. It is therefore welcomed that the contextual statement in the draft policy recognises that aim, stating that “a regionally tailored approach to planning for and coordinating native vegetation management is needed to account for this diversity, and to provide the consistency, transparency and clarity that stakeholders are seeking.”
5. CBH recognises the challenges, obligations and opportunities for the protection and enhancement of the important biodiversity remaining within the highly cleared and fragmented landscape of the Wheatbelt, and agrees these can only be met through a more coordinated, strategic approach.

***Question 2: How suitable are the guiding principles in providing a contemporary foundation for managing native vegetation?***

6. CBH agrees that the guiding principles are suitable to providing a contemporary foundation for managing native vegetation, and note that many align with CBH's own articulated value around "striving for outcomes that benefit the environment and the communities in which we operate for the long term."
7. We also note that with a continuing increase in the State's average annual grain production, applications for clearing permits have become increasingly important as CBH pursues its Network Strategy, which focusses CBH's maintenance and capital investment on the core 100 sites that receive over 90% of the annual crop.
8. In that context therefore, native vegetation data is mainly used to inform applications by CBH to clear or impact vegetation to expand receival sites, but also for scoping offset opportunities.
9. To that point, to deliver a bioregional approach in the State native vegetation policy, in CBH's view it is essential to advance a practical and flexible bio-diversity banking option for environmental offsets in the Wheatbelt in order to meet a net improvement in native vegetation extent.

***Question 3: How well do you support the strategies and outcomes?***

10. CBH supports the strategies and outcomes set out in the Consultation Draft, noting that the overarching strategy is based off a 'Plan – Do – Check – Act' model, and as such aligns with frameworks used by CBH.
11. The key stated outcome for CBH and the Wheatbelt region refers to conservation and restoration of native vegetation at "landscape-scale". As set out above, given the net improvement objective articulated under roadmap strategy 1.6(a), CBH agrees that such an approach is a feasible way to achieve this within the Wheatbelt region, and is central to our own biodiversity and offsetting strategy.

***Question 4: How suitable are the goals and approaches in guiding implementation of the policy?***

12. CBH agrees that the goals and approaches are suitable, with particular reference to Goals 1 (a) and (c), Goal 2 (a), Goal 4 (a) and Approaches 1 (ii), (vi), (viii), 2 (iii), 4 (v) which are well aligned with CBH's own approach to sustainability, biodiversity and offsetting.

***Question 5: Which roadmap actions are most important?***

13. From CBH's perspective, roadmap actions 1.6, 3.4 and 4.2 are the most important to its operations, and additional feedback on each of these is provided below.

**Additional feedback**

***Strategy 1: Planning, collaboration and coordination***

14. With regard to roadmap action item 1.6:
  - a. CBH agrees and is supportive of the explicit reference to the Wheatbelt region, given the biodiversity and economic value of region.

- b. CBH is supportive of action 1.6(a), and given DWERs experience and understanding of native vegetation issues in the Wheatbelt, CBH would see DWER as being the agency best placed to lead actions under 1.6 (a).
- c. As per CBH's comment to roadmap actions 4.2 (a) and (b) below, and given the "net improvement" objective articulated in action 1.6(a), CBH would see bio-diversity banking offsetting in the Wheatbelt as warranting its own stand-alone "priority project" status under the strategy's roadmap actions. As previously stated, CBH is supportive of efforts to make clear the circumstances under which offsets can be applied, and the circumstances in which bio-diversity banking can be used.

***Strategy 3: Build, share and use knowledge to improve***

- 15. CBH supports the approach in roadmap action 3.3(a), and as a proponent will continue to supply Index of Biodiversity Surveys (IBSA) data for use where relevant and in order to assist in the outcomes outlined for Strategy 3.
- 16. CBH supports roadmap action 3.4 and agrees this should be a priority action.

***Strategy 4: All sectors enabled***

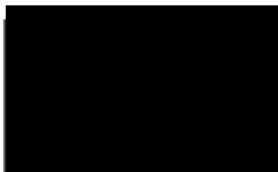
- 17. CBH is supportive of the approach outlined in roadmap action 4.2(a) and (b) and agrees DWER is the best agency to lead.
- 18. With regard 4.2(b), CBH would see DBCA as also being a key partner agency given the focus on regional strategic priorities. CBH would see both these actions as warranting "priority project" status under the roadmap, given their importance and relevance to 1.6, noting the specific reference to offsets in 1.6(a).

**Conclusion**

- 19. We are grateful for the opportunity to provide feedback to the Issues Paper and ask that you contact our Head of Government & Industry Relations, Mr David Paton, should there be anything further you require.

Yours sincerely,

**FOR: CO-OPERATIVE BULK HANDLING**



  
**Chief External Relations Officer**