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Our reference: SRGJQ333A51-99490

Native Vegetation Strategy Branch  
Department of Water and Environmental Regulation  
To: [nvs@dwer.wa.gov.au](mailto:nvs@dwer.wa.gov.au)

Dear Sir or Madam

**Consultation draft: Native Vegetation Policy for Western Australia**

Woodside Energy Limited ('Woodside') is pleased to respond to the State Government's consultation on the *Native Vegetation Policy for Western Australia*. We welcome the State Government's efforts to drive alignment and consistency across agencies on management of native vegetation.

Woodside, Australia's largest Liquified Natural Gas ('LNG') producer, has set clear near- and medium-term targets to reduce its corporate equity net Scope 1 and 2 greenhouse gas emissions. These targets are to reduce by 15% (2025) and 30% (by 2030) from the 2016-20 gross annual average, on a pathway to achieve an aspiration of net zero equity Scope 1 and 2 emissions by 2050 or sooner.

Woodside significantly contributes to the revegetation of native flora in Western Australia through our carbon offset projects. In addition to the direct biodiversity and habitat replenishment benefits, these projects will help to improve biological connectivity between remnant vegetation, Reserves and Parks. These projects include:

- A mixed native tree planting project across approximately 3000 hectares of marginal agricultural land for carbon purposes, which will inherently improve degraded lands and enhance biodiversity.
- Potential carbon projects in the rangelands region utilising the Human Induced Regeneration (HIR) method.

In 2020 Woodside funded a seed collection training program, facilitated by Greening Australia which allowed for Indigenous employment across five separate ranger organisations. The Seed Collection Training aimed to build native seed collection skills across Noongar communities in south-west WA, contributing to the following outcomes:

- Future seed availability and security of supply for restoration works across south-west WA
- Foundational capacity and skills to support the development of Noongar seed supply enterprises in the short to medium term.

Woodside supports policies that protect and support national ecological sustainability goals through native vegetation management and appreciate a focus on building capabilities and skills in the sector. We plan to expand our portfolio of projects in 2022 and beyond as part of our corporate commitments to reduce our net greenhouse emissions.

The draft Policy refers extensively to "restoration". Whilst carbon offset projects deliver the above benefits, the level of investment required to achieve a "restoration" rather than "reforestation" outcomes (as per the Clean Energy Regulator (CER) method) is considered significantly higher – especially at a landscape scale. There is however significant potential to leverage a foundation carbon investment, and supplement it to achieve restoration outcomes at a cost significantly less than a standalone restoration project. Woodside would be willing to discuss mechanisms by which biodiversity or co-benefits outcomes are realised.

The draft Policy refers to the development of new tools to measure and monitor native vegetation. We would encourage collaboration with the CER to ensure a uniform set of tools is developed and effort is directed into improvement of existing tools and techniques. Woodside has a mature and sophisticated enterprise Geographic Information System (GIS) developed to support our core oil and gas business. In recent years

this expertise has been leveraged to assist with the evaluation, development, and monitoring of carbon projects with great success and we would welcome an opportunity to discuss specific opportunities for collaboration or improvement in this area.

In Strategy 4 (4.3 and 4.4), the draft policy makes specific reference to “enhancing the effectiveness of fuel mitigation programs” and “planning for Aboriginal engagement in bushfire management through existing and future initiatives”. Woodside sees significant potential for the development of a new fire management-based carbon methodology in conjunction with the Ngadju people that could be applied to the Great Western Woodlands (GWW). While preliminary studies have confirmed there is potential to sequester carbon in the GWW, a barrier to Emissions Reduction Fund method development is the lack of additional studies by experienced fire management professionals (who are typically State employed) that can be used to define suitable fire management activities under the method (eg. fire management techniques and effectiveness, costs, logistics).

Without additional studies, the viability of a new method cannot be evaluated. Woodside would be willing to collaborate with the State in this regard as we believe a new carbon methodology has the potential to deliver long term (25 year) funding for on-the-ground fire management through Traditional Owners, significant carbon abatement, biodiversity and conservation benefits.

As Woodside continues to build a diverse carbon portfolio, we would welcome policy which assesses, and rewards co-benefits associated with Carbon projects. We would like to ensure consideration is given to existing tools and processes provided by the CER and would be pleased to meet with the Department of Water and Environmental Regulation to provide further information on the issues and opportunities identified above.

Yours faithfully

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