

9.3.2 Proposed Tree Farm – Carbon Neutral

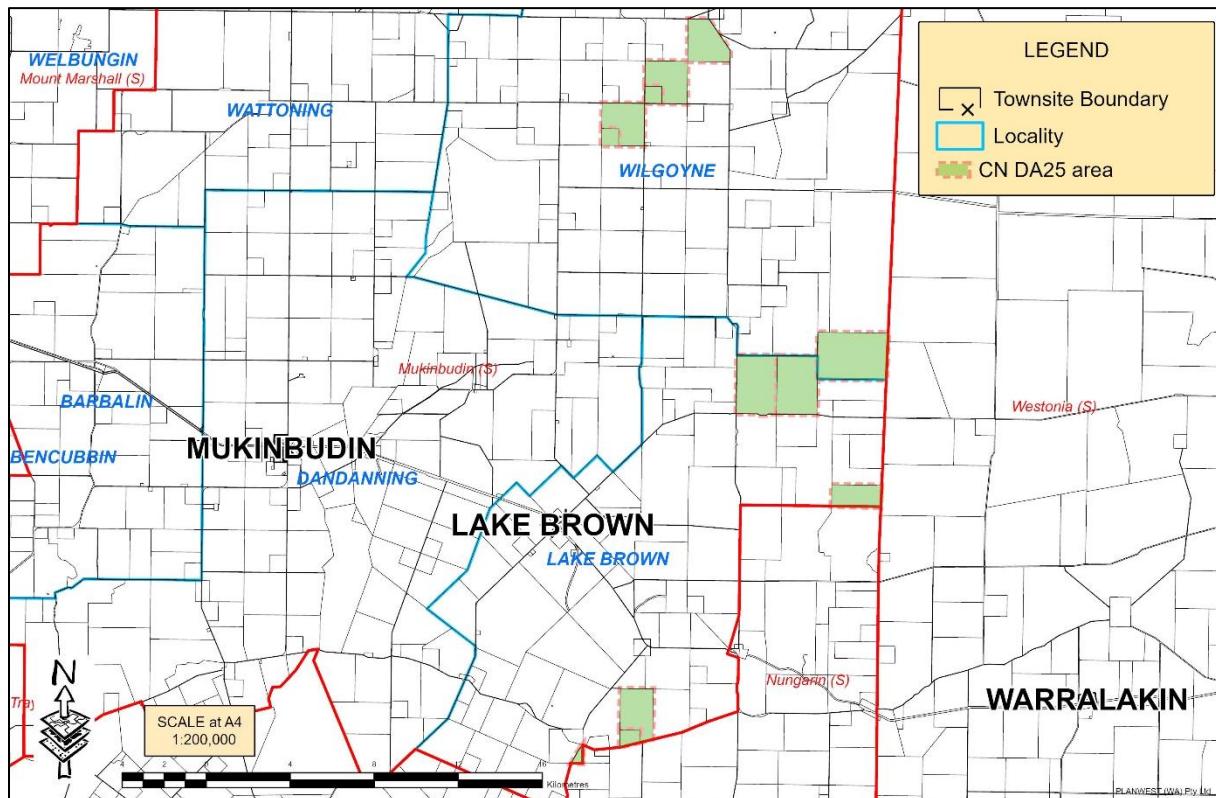
| | |
|-------------------------|--|
| Location: | Various Lots in Wilgoyne and Lake Brown |
| File Ref: | XX |
| Applicant: | Carbon Neutral |
| Date: | 1 st December 2025 |
| Disclosure of Interest: | Nil |
| Responsible Officer | Tanika McLennan, Chief Executive Officer |
| Author: | Paul Bashall, Consultant Planner - Planwest |
| Voting Requirements: | Absolute Majority |
| Documents Attached: | Development Approval (DA) Application Form, DA Plan, |
| Documents Tabled: | Nil |

Summary

Carbon Neutral (CN) has applied for a Development Approval (DA) for a tree farm over 12 lots in the localities of Wilgoyne and Lake Brown. The lots are owned by Apache Investments Australia Pty Ltd (Apache). The Form 1 has been signed by the Chief Operating Officer (COO) of Apache.

Figure 1 provides a location plan of the subject land.

FIGURE 1 – LOCATION PLAN OF CURRENT DA



Source: Landgate, Planwest

Figure 1 also shows the subject land in relation to the nearby townsites, the Shire boundary and locality boundaries. It is noted that Lot 23166, which is contained in the Schedule of properties, is in the Shire of Nungarin.

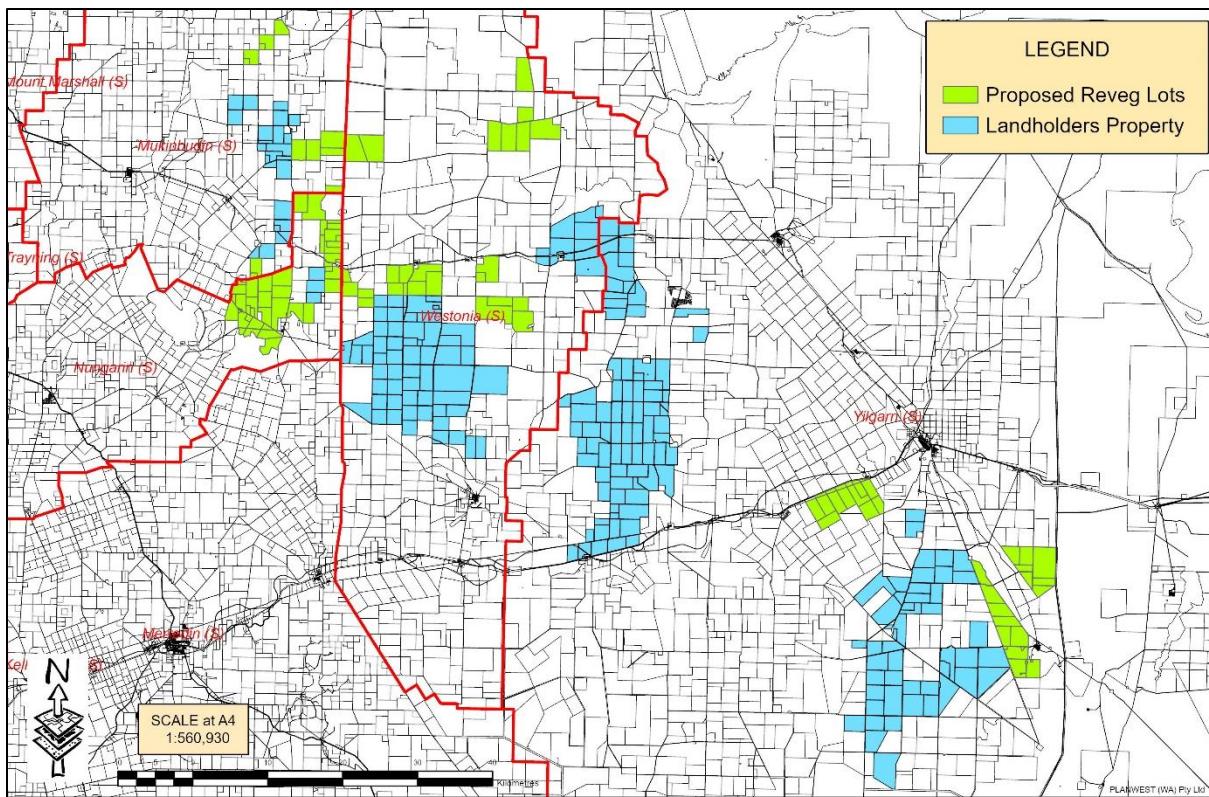
Background Information

Other Apache Land

Apache is the owner of many properties spread across several Shires in the Eastern Wheatbelt area. It is likely that this project may extend to other landholdings in the future once the company has assessed the success and viability of the current proposal as it relates to different land types and species across the region.

Figure 2 shows other land holdings owned by Apache in the Eastern Wheatbelt area covering land in the Shires of Mukinbudin, Nungarin, Westonia and Yilgarn. This information has previously been provided as part of Carbon Neutral's earlier discussions with these Shires.

FIGURE 2 – OTHER APACHE OWNED LAND



Source: Landgate, Carbon Neutral, Planwest

WAPC Tree Farm Fact Sheet

The WA Planning Commission (WAPC) and the Department of Planning, Lands and Heritage (DPLH) released a fact sheet on Tree Farms in November 2023. Fact sheets are a method in which these agencies can clarify the planning arrangements within the appropriate State Planning Policies (SPP) - in this case SPP 2.5- Rural Planning.

The fact sheet states that 70% of tree farms were established in the Southwest of the State due to the rainfall being over 600mm per annum. However, there appears to be a steady widening of these areas for tree farms as different methods, species and understanding of the techniques improves.

It should be noted that the most common tree farms, that are currently established, are for harvesting of the product, however, there appears to be a growing interest in tree farms for carbon sequestration projects. In these cases, there is no requirement for harvesting but there may be an increased focus on management requirements.

SPP 2.5 sets out 7 key policy positions to facilitate a co-ordinated approach to tree farms in WA. In summary, the intent of each **relevant** policy statement is explained below.

1. *tree farming is supported and encouraged on rural land as a means of diversifying rural economies and providing economic and environmental benefit* – this means the WAPC supports tree farms in rural areas and will implement this approach in assessment of local planning strategies and schemes;

3. *tree farming should generally be a permitted use on rural land*,

5. *in planning for tree farming, local government considerations should include but are not limited to, potential bushfire risk, environmental and economic factors, water availability and recharge, visual landscape impacts, transport impacts of tree farming (where harvesting is proposed), planting thresholds, appropriate buffers, and location relative to conservation estates and sensitive land uses* – this means that local governments should consider tree farms in the context of other existing and proposed land uses in their municipality, and set planning controls as required, based on demonstrated evidence that the control is needed;

Do tree farms have an impact on agricultural communities?

The WAPC Tree Farm fact sheet states that the Australian economy has been forced to adjust structurally over time, which has seen ongoing change in the agricultural sector. Research by Rural Industries Research and Development Corporation (RIRDC) in 2001 and 2007 highlights the impacts of globalised economic rationalism on family farms and subsequent issues of their declining viability, leading to farm amalgamation, reduced labour hire and the contraction of local economies.

Tree farms are part of the ever-changing agricultural sector. But they are not the underlying cause of the population or economic changes.

For local governments where pine tree farms are likely to be developed, population change data from the Australian Bureau of Statistics (Census 2001 to 2021), indicates that the general trend is for increasing or stable population figures, and the 'family' makeup of households has remained steady at around 70%. Family composition or population has not significantly declined in the last 20 years

What are the land use planning considerations with tree farms?

The WAPC Tree Farm fact sheet states that the growing of trees for timber is similar to other crops, however there are some planning issues associated with tree farming that may require further assessment and management, if relevant. As set out in SPP 2.5, these include:

- *Bushfire risk* – tree farms may establish a bushfire risk where not occurring before. The Department of Fire and Emergency Services has published guidelines to assist in the management of bushfire risk for tree farms. Any development conditions to manage bushfire risk should accord with these guidelines.
- *Environmental and economic issues*, including planting thresholds – the location of tree farms relative to environmental and/or biodiversity assets, and management of potential impacts (eg wildling spread). So too, ensuring there is a balanced supply of rural land for other economic activity can be addressed in local planning strategies.
- *Water availability and recharge* – potential impacts on groundwater and surface water systems may need to be considered.
- *Visual landscape impacts* – local governments may identify rural prominent landscapes to exclude tree farms for visual reasons. While the converse may occur, these areas can be identified in keeping with the Western Australian Planning Commission's (WAPC) Visual Landscape planning manual.
- *Transport impacts* – where tree farming involves harvesting, local governments may need to make arrangements with developers for road and/or intersection upgrades to manage potential haulage impacts.
- *Separation from sensitive land uses* – local governments may establish buffers to exclude tree farming around these land uses eg. electrical substations or transmission lines.

Existing Development

The DA states that there are no structures on the subject land. It appears from aerial photographs that much of the land has been cleared with some areas of remnant vegetation. It is unclear from aerial photographs how much of the land is currently used for agricultural purposes.

Proposed Development

This project involves establishing permanent native revegetation and mixed environmental plantings on land currently being operated by Mr John Nicoletti on behalf of the owners. It is intended that development will occur over 2026 and 2027 at a cost of \$250,000.

The project aims to re-forest lower quality or degraded landscapes and some higher risk farming areas with endemic native vegetation. Environmental planting of this nature will improve biodiversity, sequester carbon, assist to mitigate soil salinity, and stabilise the land.

The applicant states that *the proposal has been prepared to align with the Shire's objectives, requirements, and environmental and agricultural priorities. The design ensures continued productivity of agricultural land, avoids impacts to remnant vegetation, and incorporates robust fire management measures consistent with the Shire's Firebreak Notice.*

The proposed revegetation is planned to be commenced during winter 2026 and completed by 2028. Areas not planted in any year will continue to be operated for agriculture.

Carbon Neutral Pty Ltd have been carrying out permanent revegetation works in the northern wheatbelt for two decades and has developed successful techniques for revegetation of land on lower productivity sites in lower rainfall areas.

Carbon Neutral will maintain a viable, operating property that continues to support the local community. Up to June 2020, Carbon Neutral's projects in the northern and eastern wheatbelt of Western Australia have contributed significantly to their local communities (and continues to increase our contribution), including:

- Engaging over 80 businesses for services,*
- Excluding land purchases, having spent \$12.8M in local economies,*
- Over the life of the current projects, will contribute up to \$30M in regional economic impact, and*
- Supporting community events and initiatives wherever possible.*

Carbon Neutral is a responsible landowner, engaging with local activities and groups for feral animal control and properly maintaining firebreaks and infrastructure to support local fire prevention efforts.

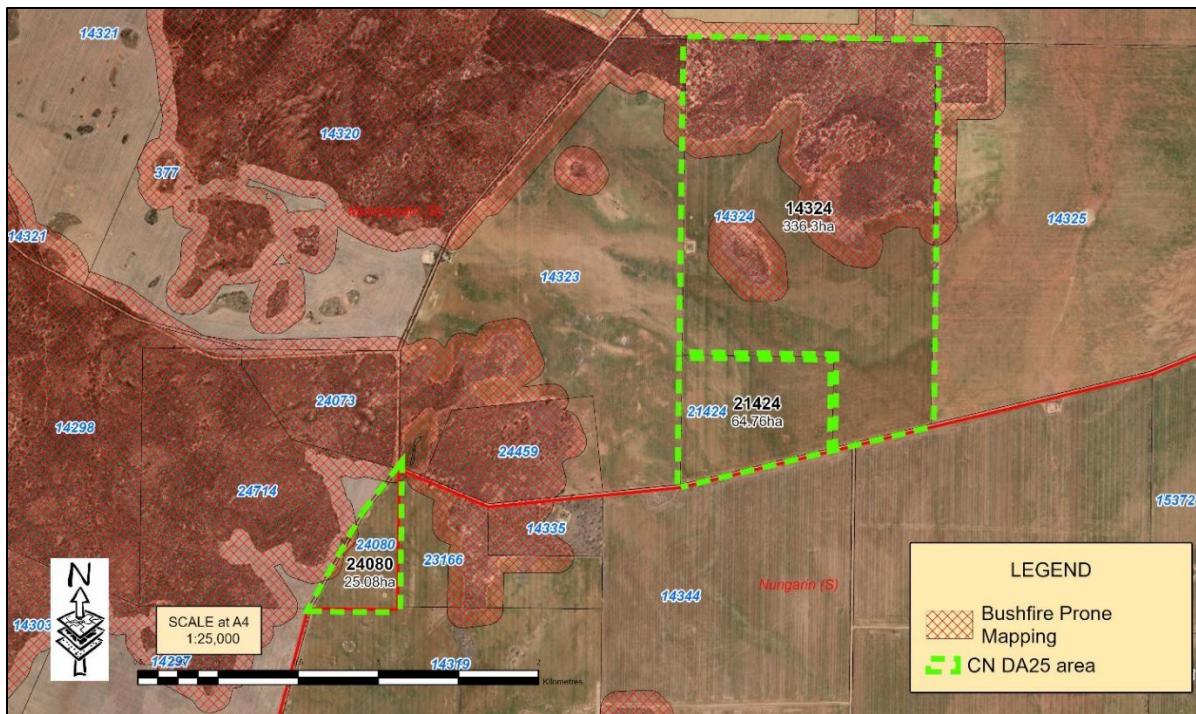
A Management Plan for the property is included with this Planning Application. The Management Plan details establishment and management arrangements, maps of the proposed plantings, and a fire management regime. The Plan is consistent with the requirements of the DFES Guidelines for Fire Protection and the Code of Practice for Timber Plantations (bearing in mind the proposed plantings are not intended for harvesting).

The proposal also includes lots on neighbouring Shires. The project aims to re-forest lower quality or degraded landscapes and some higher risk farming areas with endemic native vegetation. Environmental planting of this nature will improve biodiversity, sequester carbon, assist to mitigate soil salinity, and stabilise the land.

The Lots that are the subject of this DA include four areas (as described in the DA) as follows.

Area 1 (South) includes three lots measuring a total of 426.3 hectares. **Figure 3** provides an aerial photograph of this area showing that only about 50% of Lot 14324 being used for agricultural uses. The figure also shows the Bushfire Prone mapping prepared by DFES.

FIGURE 3 – AREA 1



Source: Landgate, Planwest

Area 2 (North) includes 5 lots measuring 1,140 hectares in total. **Figure 4** provides an aerial photograph of this area showing a portion of Lot 810 containing what looks like remnant vegetation. The figure also shows the Bushfire Prone mapping prepared by DFES.

FIGURE 4 – AREA 2



Source: Landgate, Planwest

Area 3 (East) includes 3 lots measuring 1,793 hectares in total. **Figure 5** provides an aerial photograph of this area showing a portion of the lots containing what looks like remnant vegetation. The figure also shows the Bushfire Prone mapping prepared by DFES.

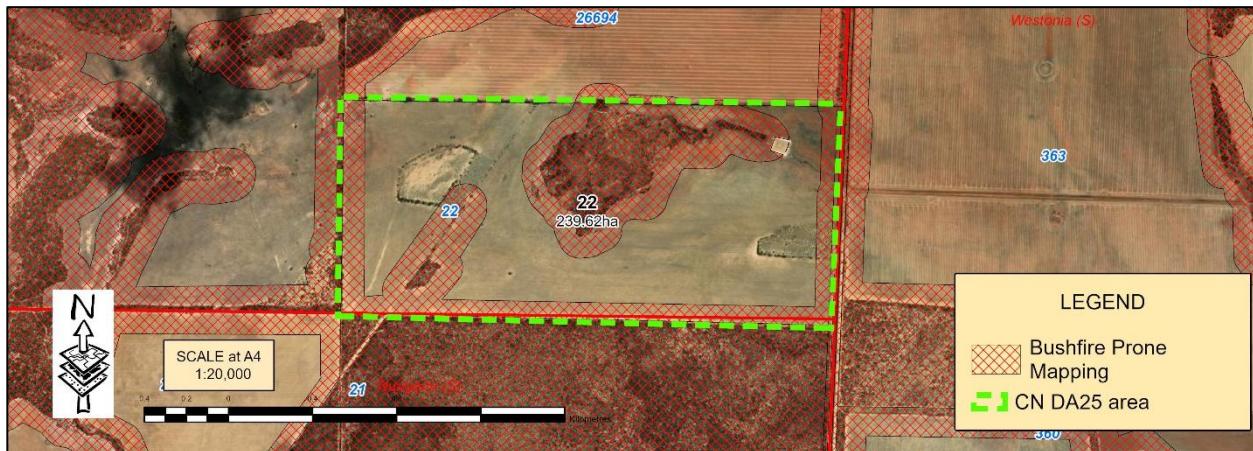
FIGURE 5 – AREA 3



Source: Landgate, Planwest

Area 4 (North) includes 1 lot measuring nearly 240 hectares. **Figure 6** provides an aerial photograph of this area showing a portion of the lot containing what looks like remnant vegetation. The figure also shows the Bushfire Prone mapping prepared by DFES.

FIGURE 6 – AREA 4



Source: Landgate, Planwest

The applicant states that *DPIRD assessments show a significant proportion of the project area contain land that is classed at the lower end of productivity for broadacre cropping, but have a reasonable suitability for grazing.*

The applicant further states that *initially, the Project proposes to establish trees across a subset of the titles currently owned and operated under entities managed by Mr John Nicoletti. This subset of titles will be purchased by Carbon Neutral for the primary purpose of establishing a tree farm.*

Discussions are continuing with Mr Nicoletti for the project to be expanded over 3-4 years as part of a broader proposal for ongoing agricultural production across higher yielding areas, and planting blocks of native vegetation on areas of lower cropping productivity and around paddocks to create squarer paddocks for easier cropping.

In the shorter term, these initial lots will allow for future grazing activities but will not support broadacre cropping.

The report accompanying the DA details the land and agricultural capability, including soils, dryland cropping, grazing and salinity factors, based on information from the Department of Primary Industry and Regional Development (DPIRD).

The report suggests that once the forest is sufficiently matured (~3 years), the area can be used to allow grazing and harvesting forest products such as honey. There are also various design options that allow for reservation of land area for cropping and grazing, such as planting in belts along fence lines and to square up paddocks. Although not intended on the current application, practical ongoing broadacre cropping is usually incorporated into the design of our projects in two main ways:

- *Keeping tree plantings to edges of cropping areas and to square up paddocks, and*
- *Where belts are within cropping areas, these are separated sufficiently for multiple passes of modern broadacre equipment in between the belts.*

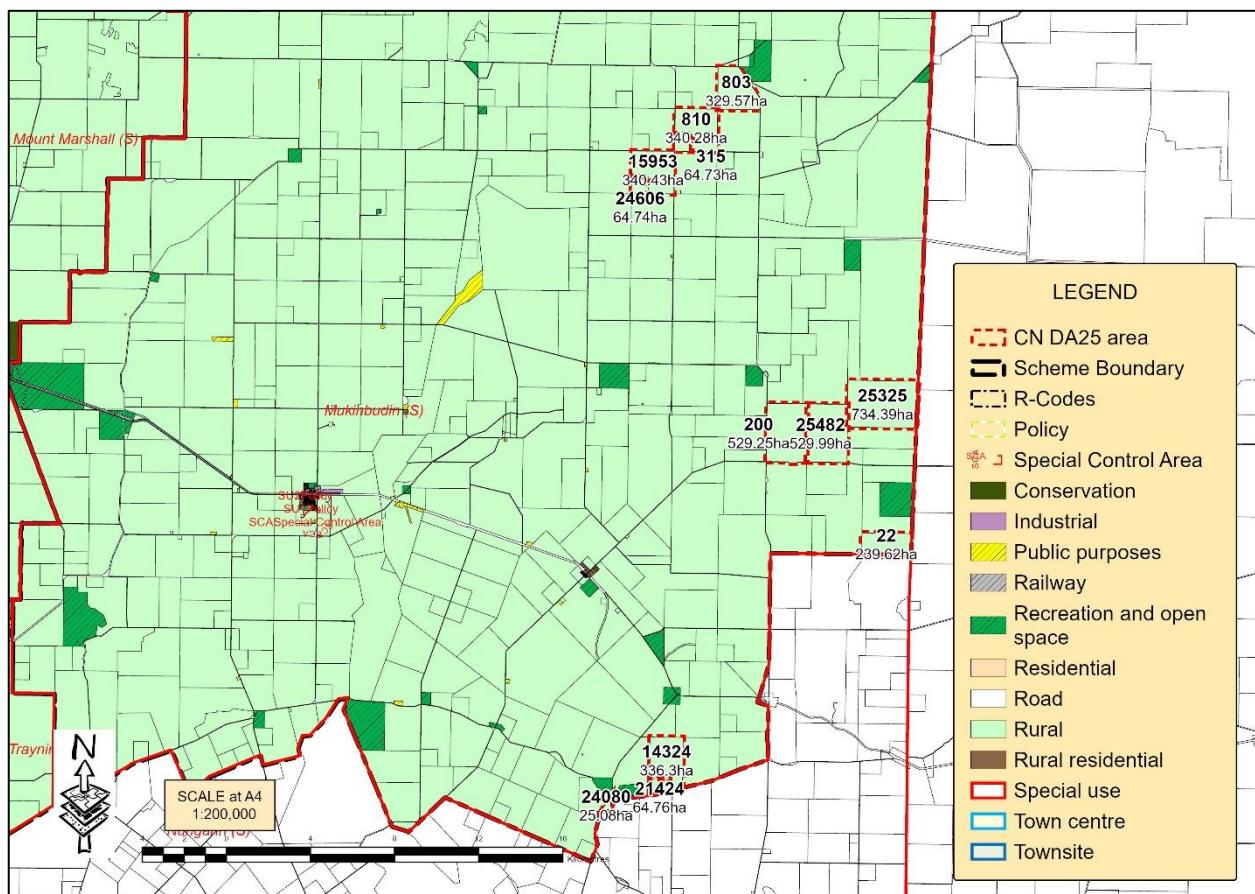
Strategic & Social Implications

There is no Local Planning Strategy for the Shire and the Council sees no strategic or social implications of the proposed development provided the conditions of the DA are complied with.

Statutory Environment

The Shire of Mukinbudin Local Planning Scheme No 4 (Scheme 4) was originally approved in 2003. The subject land holdings are all included in the Rural zone as shown in an extract from the Scheme mapping (**Figure 7**).

FIGURE 7 – EXTRACT FROM SCHEME



Source: Landgate, DPLH, Planwest.

A Tree farm is not a listed use class in the Zoning Table (Table 1 of the Scheme). Clause 3.4.2 of the Scheme provides the Council with the discretion for unlisted uses to –

- (a) determine that the use is consistent with the objectives of the particular zone and is therefore permitted;
- (b) determine that the proposed use may be consistent with the objectives of the particular zone and thereafter follow the advertising procedures of clause 64 of the deemed provisions in considering an application for development approval; or
- (c) determine that the use is not consistent with the objectives of the particular zone and is therefore not permitted.

Consultation

Nil, however, it is recommended that the DA be referred to agencies including DFES, DBCA and EPA for comment.

Policy Implications

There are no Council policy implications that relate to the proposed development.

Financial Implications

Nil.

Bushfire Prone Mapping

The Bushfire prone mapping is shown in **Figures 3-6** for each area. Although there are no dwellings or other sensitive uses involved in the proposal, the development may increase the chance of a bushfire or the consequences of a bushfire.

Officer Comment

The proposal in principle is supported as it seeks to better use rural land that is considered marginal for traditional agricultural uses. At the same time, it promotes long-term carbon sequestration and permanent biodiversity restoration.

To ensure that the project is appropriately managed, it is recommended that the DA be determined as a use class not listed and advertised in accordance with clause 3.4.2 (b) *determine that the proposed use may be consistent with the objectives of the particular zone and thereafter follow the advertising procedures of clause 64 of the deemed provisions in considering an application for development approval*; by –

- a) Advertise the DA on the Shire's web site and advising adjacent neighbours inviting submissions from interested parties within 28 days, and
- b) Referring the DA to the following agencies for comment with the recommendation that the following draft conditions be imposed to ensure compliance with current policies and requirements.
 - DFES (Department of Fire and Emergency Services)
 - EPA (Environmental Protection Authority)
 - DWER (Department Water and Environmental Registration),
 - DAA (Department of Aboriginal Affairs now part of Department of Local Government, Sport and Cultural Industries – Aboriginal Engagement and Culture Division), and
 - DBCA (Department of Biodiversity, Conservation and Attractions)

Suggested draft conditions -

1. The preparation of a Bushfire Management Plan prepared by a qualified Bushfire Consultant to the satisfaction of the local government and DFES.
2. No clearing of native vegetation or TECs (Threatened Ecological Communities) without permits.
3. The preparation of a Property Management Plan to include weed and pest control management, inspection and maintenance schedule, emergency contact details, salinity monitoring and fencing to the satisfaction of the local government.
4. The preparation of a plantation establishment plan, maintenance schedule, planting types and locations, and ultimate fencing plans, to the satisfaction of the local government.

Responses from these referrals should be requested within 28 days to ensure that the Council is able to determine the DA within the prescribed time.

OFFICER RECOMMENDATION

Council Decision Number –

Moved: Cr

Seconded: Cr

That the Council, under the provisions of Clause 3.4.2 (b), resolves to determine that the DA is not a complex application, and -

- a) Advertise the DA on the Shire's web site and advising adjacent neighbours inviting submissions from interested parties within 28 days, and
- b) Refer the DA to DFES, EPA, DWER, DAA and DBCA for comment with the recommendation that the following draft conditions be imposed to ensure compliance with current policies and requirements.
 1. The preparation of a Bushfire Management Plan prepared by a qualified Bushfire Consultant to the satisfaction of the local government and DFES.
 2. No clearing of native vegetation or TECs (Threatened Ecological Communities) without permits.
 3. The preparation of a Property Management Plan to include weed and pest control management, inspection and maintenance schedule, emergency contact details and salinity monitoring program to the satisfaction of the local government.
 4. The preparation of a plantation establishment plan, maintenance schedule, planting types and locations, and ultimate fencing plans, to the satisfaction of the local government.

Carried /

6 November 2025

Ms Tanika McLennan
Chief Executive Officer
Shire of Mukinbudin
15 Maddock Street
Mukinbudin WA 6479

Dear Ms McLennan,

Re: Submission of Development Application – Shire of Mukinbudin Tree Farm Project

Carbon Neutral Pty Ltd is pleased to submit a Development Application for the proposed Tree Farm Project, covering several lots within the Shire of Mukinbudin. This project involves establishing permanent native revegetation and mixed environmental plantings on land currently being operated by Mr John Nicoletti.

Please find enclosed the following documents in support of the application:

1. Signed Shire of Mukinbudin Development Application Form
2. Tree Farm Management Plan
3. Attachment – Lot Details and Cadastral Information

The proposal has been prepared to align with the Shire's objectives, requirements, and environmental and agricultural priorities. The design ensures continued productivity of agricultural land, avoids impacts to remnant vegetation, and incorporates robust fire management measures consistent with the Shire's Firebreak Notice.

The proposed revegetation is planned to be commenced during winter 2026 and completed by 2028. Areas not planted in any year will continue to be operated for agriculture.

Carbon Neutral Pty Ltd have been carrying out permanent revegetation works in the northern wheatbelt for two decades and has developed successful techniques for revegetation of land on lower productivity sites in lower rainfall areas.

Carbon Neutral will maintain a viable, operating property that continues to support the local community. Up to June 2020, Carbon Neutral's projects in the northern and eastern wheatbelt of Western Australia have contributed significantly to their local communities (and continues to increase our contribution), including:

- Engaging over 80 businesses for services,
- Excluding land purchases, having spent \$12.8M in local economies,
- Over the life of the current projects, will contribute up to \$30M in regional economic impact, and
- Supporting community events and initiatives wherever possible.



Carbon Neutral is a responsible landowner, engaging with local activities and groups for feral animal control and properly maintaining firebreaks and infrastructure to support local fire prevention efforts.

A Management Plan for the property is included with this Planning Application. The Management Plan details establishment and management arrangements, maps of the proposed plantings, and a fire management regime. The Plan is consistent with the requirements of the DFES Guidelines for Fire Protection and the Code of Practice for Timber Plantations (bearing in mind the proposed plantings are not intended for harvesting).

Carbon Neutral welcomes any questions from Shire staff or Council and would be pleased to provide additional information or meet to discuss the proposal should that be helpful.

Thank you for considering this application. We look forward to working with the Shire throughout the assessment process.

Yours sincerely,

A handwritten signature in blue ink that reads "Nevin Wittber".

Nevin Wittber
Chief Operations Officer
Carbon Neutral Pty Ltd



Planning Application –
Tree Farm Management
Plan

Shire of Mukinbudin

October 2025

Prepared by:



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1. Summary of Proposal

Carbon Neutral are proposing to develop a tree farm project across several lots within the Shire of Mukinbudin. The proposal also includes lots on neighbouring Shires. The project aims to re-forest lower quality or degraded landscapes and some higher risk farming areas with endemic native vegetation. Environmental planting of this nature will improve biodiversity, sequester carbon, assist to mitigate soil salinity, and stabilise the land.

A summary of key information is provided in this section with more detail available in the subsequent sections.

Locations

The deposited plan, lot numbers, and total lot areas, are outlined in Table 1: Title details. The location of the project's lots and their associated groupings is shown in Figure 1 below.

Figure 1: Project Cadastral boundaries

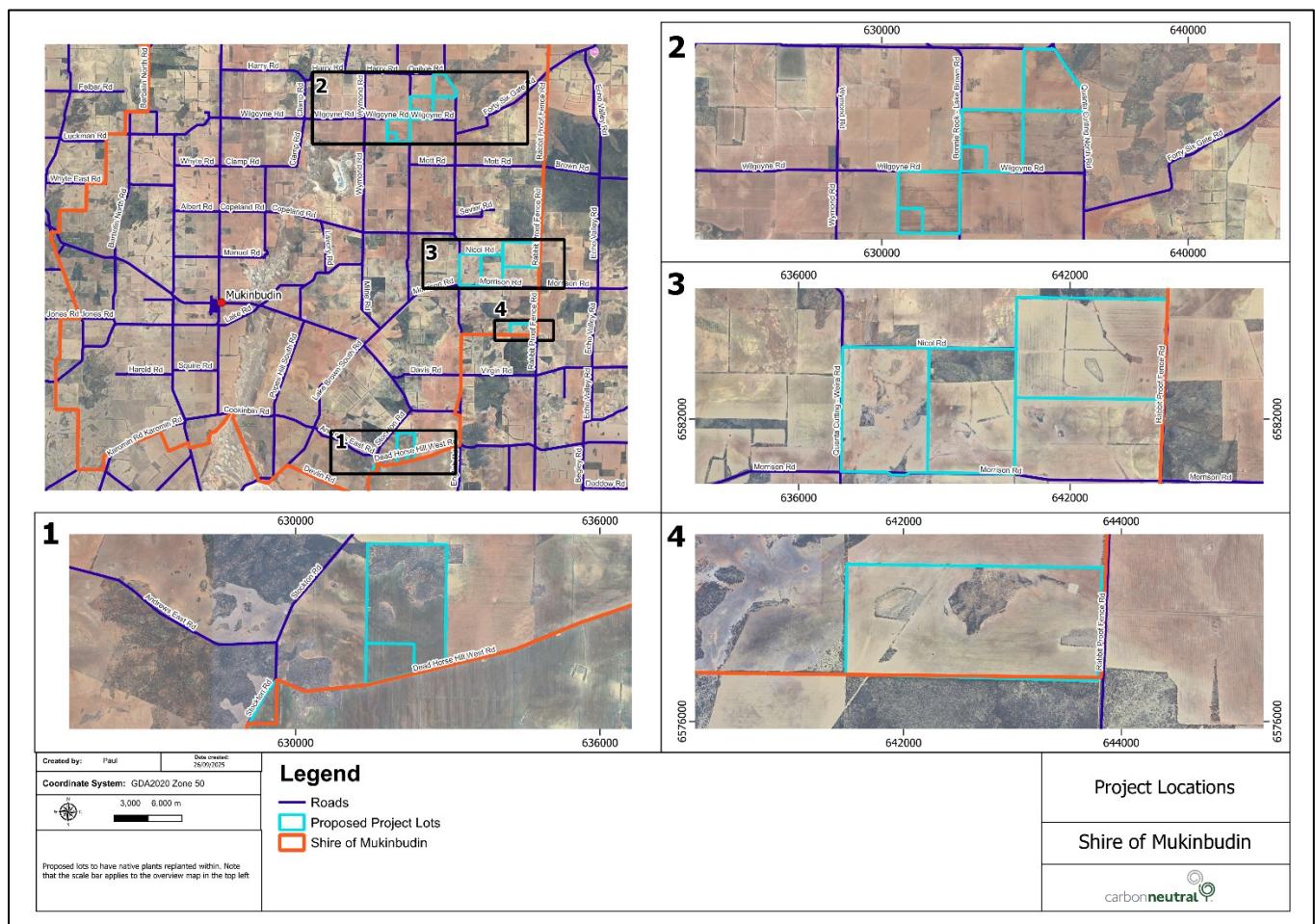


Table 1: Title details

| Land ID | Deposited Plan | Lot No | Area (ha) | Ownership |
|---------|----------------|--------|-----------|--------------------------------------|
| 1833410 | 225448 | 14324 | 336.4 | Apache Investments Australia Pty Ltd |
| 1834752 | 225520 | 15953 | 340.6 | Apache Investments Australia Pty Ltd |
| 1839525 | 225448 | 21424 | 64.8 | Apache Investments Australia Pty Ltd |
| 1840776 | 225430 | 23166 | 64.8 | Apache Investments Australia Pty Ltd |
| 1841412 | 148346 | 24080 | 25.1 | Apache Investments Australia Pty Ltd |
| 1841781 | 225520 | 24606 | 64.8 | Apache Investments Australia Pty Ltd |
| 1842308 | 154156 | 25325 | 734.6 | Apache Investments Australia Pty Ltd |
| 1842428 | 154881 | 25482 | 530.2 | Apache Investments Australia Pty Ltd |
| 1972255 | 225520 | 315 | 64.8 | Apache Investments Australia Pty Ltd |
| 1972644 | 225520 | 803 | 329.7 | Apache Investments Australia Pty Ltd |
| 1972651 | 225520 | 810 | 340.4 | Apache Investments Australia Pty Ltd |
| 3395669 | 300394 | 200 | 529.4 | Apache Investments Australia Pty Ltd |
| 3916956 | 65468 | 22 | 239.7 | Apache Investments Australia Pty Ltd |

Contact Details

Table 2: Contact details

| Current Landowners | Project Proponent |
|---|---|
| Apache Investments Australia Pty Ltd Level 1 2-4 Harper Terrace South Perth, WA 6151 Contact: Dianne Landridge Assistant to Mr. John Nicoletti dianne.landridge@apacheinvestments.com.au M: 0400 115 580 | Carbon Neutral Pty Ltd 197 St. Georges Terrace Perth, WA 6000 Contact: Nevin Wittber Chief Operating Officer Nevin.wittber@carbonneutral.com.au M: 0407 773 584 |

Land and Agricultural Capability

DPIRD assessments show a significant proportion of the project area contain land that is classed at the lower end of productivity for broadacre cropping, but have a reasonable suitability for grazing. Once the trees are sufficiently established to withstand grazing pressures, the managed grazing of stock can be facilitated across the project area.

In general terms, the proposed lots are considered less attractive components of the total agricultural area currently being operated by the owner.

Ongoing Agriculture

Initially, the Project proposes to establish trees across a subset of the titles currently owned and operated under entities managed by Mr John Nicoletti. This subset of titles will be purchased by Carbon Neutral for the primary purpose of establishing a tree farm.

Discussions are continuing with Mr Nicoletti for the project to be expanded over 3-4 years as part of a broader proposal for ongoing agricultural production across higher yielding areas, and planting blocks of native vegetation on areas of lower cropping productivity and around paddocks to create squarer paddocks for easier cropping.

In the shorter term, these initial lots will allow for future grazing activities but will not support broadacre cropping.

Fire Management

A setback of 15m for tree plantings will be applied to all boundaries of lots neighbouring other landowners, and external firebreaks will be maintained at 10m width.

Internal firebreaks will be maintained at 6m and created according to individual property access tracks and fencelines.

Readily available water supplies of 50,000 litres will be maintained strategically across each property to support fire-fighting efforts on the property and surrounding area. These details and associated maps are shown in the Fire Management Plan section of this document.

Pest and Vermin Management

Vermin on the property will be actively managed via culling and baiting when required. The property will be included in broader community campaigns for vermin control aligning with the activities of the Eastern Wheatbelt Biosecurity Group.

General Property Management

If the project is approved across all Shires, Carbon Neutral will employ a Farm Manager (and likely a second Farm Manager as the project progresses) based in the Eastern Wheatbelt, whose responsibility it is to keep in contact with neighbours, maintain infrastructure, monitor firebreak conditions, contribute to fire management efforts in the district and wherever possible support community initiatives.

The Farm Manager is contactable outside normal working hours and can assist with any query or activities across the project area. Until a local farm manager is employed, our Perenjori-based farm manager, supported by existing staff will fill these requirements.

Community Awareness and Engagement

Carbon Neutral aims to be a sustainable community member in the locations of our operations. The nature of this varies across local communities so Carbon Neutral commits to working with the Shire to determine a suitable arrangement for upfront and/or ongoing financial or other contributions to community development initiatives.

2. Intent of this Document

This document supports an application under the Shire of Mukinbudin's *Town Planning Scheme No.4*. The Scheme's objectives include encouraging natural resource management, promoting sustainable land use, and maintaining agricultural production. This plan demonstrates how the proposed revegetation supports these objectives.

A small amount of background information is provided, but the majority of the content generally address requirements of the Shire's planning approval framework.

The information within, intends to meet the requirements of a 'Management Plan' for the ongoing management of the tree farm project.

3. Project Objectives

Background

Carbon Neutral specialises in revegetation of lower productivity farmland and integrating native species plantings with existing agricultural operations. While this project proposes to establish a tree farm across entire lots, the broader 'across Shires' project will establish revegetation on marginal land over the northern and eastern wheatbelt, while higher-productivity areas continue to be used for cropping and grazing.

The objectives are to improve land condition, reduce salinity, enhance biodiversity, and contribute to long-term carbon sequestration. The project directly supports the Shire of Mukinbudin's Natural Resource Management (NRM) objectives by promoting sustainable land use and rehabilitating lower productivity farming areas.

Schedule of Development Activities

Proposed establishment year: 2026 and 2027

Timing is of critical importance to successful outcomes in establishment activities. Carbon Neutral is accustomed to working with the specific timelines of revegetation projects each year.

| | |
|----------------|--|
| April/May 2026 | Final project planning and design. Organisation of resources and personnel. Site marking out and preparation (scalping and ripping). Removal of stock. Direct seeding commences. |
| Jun/Jul 2026 | Site cultivation, seedling planting following significant rain. |
| Aug/Sep 2026 | Pest monitoring and treatment as required. |
| Oct/Nov 2026 | Monitoring for insect impact, follow up spraying. |
| 2027 | Repeat of above for infill and remaining unplanted areas. |

Revegetation Works

The Project seeks to establish and maintain a native woodland based on the pre-clearing vegetation at the site, for the purpose of long-term carbon sequestration and permanent biodiversity restoration. Once the forest is sufficiently matured (~3 years), the area can be used to allow grazing and harvesting forest products such as honey.

Establishing a self-sustaining woodland is a key natural resource management objective. The revegetation will support increased pollinators, rejuvenate soil structure, increase soil organic matter, reduce erosion, reduce salinity, create a wind barrier for neighbouring properties, improve biodiversity values on the site and in the local area, provide habitat for native flora and fauna, sequester and store carbon dioxide from the atmosphere, help attract localised rainfall and contribute to the region's climate resilience.

The project will enhance the natural aesthetics of the landscape for ongoing enjoyment of natural values and increase the quality of land in the region for property owners.

Routine elements of a carbon project include site preparation, tree planting, ongoing weed and pest management, fire risk mitigation and growth monitoring. All operations are run in accordance with the respective legal, environmental and social obligations of the State of Western Australia and Carbon Neutral prides itself on demonstrating good neighbourly practices.

4. Planning and other Approvals

Planning

The Project is consistent with the objectives of the Shire of Mukinbudin Local Planning Scheme No. 4 (TPS4) and supporting strategies, particularly:

1. Encouraging natural resource management through revegetation and salinity mitigation, consistent with TPS4 Section 4.2 and Strategic Plan Goal 8.
2. Supporting sustainable agricultural use while diversifying land management practices, as outlined in TPS4 Section 4.2 and the Local Planning Strategy.
3. Protecting remnant vegetation and integrating new plantings with existing natural areas, in line with TPS4 Part 6 and environmental protection objectives.
4. Reducing land degradation, erosion, and salinity, consistent with TPS4 Section 4.2 and Goal 8 of the Strategic Plan. Revegetation of marginal lands contributes to long-term soil and water stability.
5. Enhancing biodiversity values within cleared landscapes, supporting TPS4 environmental objectives and Strategic Plan Goal 8.
6. Avoiding adverse impacts on water resources, cultural heritage, or public infrastructure, in accordance with TPS4 Part 6, the Water Act 1912 (WA), and the Biodiversity and Agriculture Management Act 2007 (WA).

No additional approvals are required beyond compliance with the Biosecurity and Agriculture Management Act 2007 and the Shire of Mukinbudin Firebreak Notice, which will be implemented across all project lots.

Mitigating Salinity

Rising soil salinity levels is a widespread problem in the wheatbelt. Revegetation of portions of land will alleviate salinity risk on and beyond the project area boundaries. The project involves planting species of Eucalypt, Acacia and Allocasuarina that will access the local aquifer, moderating its level and preventing the development of surface salinity. Creating canopy cover also helps to trap moisture, which further reduces soil salinity.

The Species to be Planted

The proposed plantings will comprise endemic native species of predominantly eucalypt overstorey with the dominant midstorey genera, such as Acacias, Allocasuarina, Hakeas, Calothamnus and Grevillea. Many species will be the hardy, climate resilient mallee type species. These taxa are endemic to the eastern wheatbelt region, with many having ranges that extend into the more arid rangelands to the north and east of the project area.

A specific list of species can be provided to the Shire prior to planting if required.

Planting lines are usually 5 or 6m apart and follow the contour when planted in large blocks.

Water Quality

Increased vegetation acts to filter water, reduce salinity levels and reduce moisture evaporation, keeping the water in the landscape. These elements improve water quality.

Operations will be sensitive to existing erosion channels and aim to capture water higher in the landscape and allow these channels to slowly revegetate. Site preparation considers the likelihood of erosion from wind or water. Contour site workings will be used to minimise water erosion, and the presence of continuously curving lines prevent very large areas being exposed in the event of a damaging wind.

Relevant Codes of Practice

In addition to the laws of Western Australia, the following are relevant:

- Code of Practice for Timber Plantations in Western Australia (Forest Industries Federation (WA) Inc., 2014)
- Guidelines for Plantation Fire Protection (FESA, 2011)
- Code of Practice for the use of Agricultural Chemicals in Western Australia (2005, Agriculture Western Australia).

Forestry operations will be conducted with the requirement to abide by relevant safety standards, and only experienced and professional contractors will be engaged.

Aspects of these Codes is addressed in more detail in the section on Fire Management.

Culture and Heritage

There are potentially 2 areas of Aboriginal Heritage on the broader project area. Our standard practice is to identify these areas using the available government resources and apply a 50metre no-go buffer around the sites to ensure no disturbance is caused.

Threatened Ecological Communities (TECs)

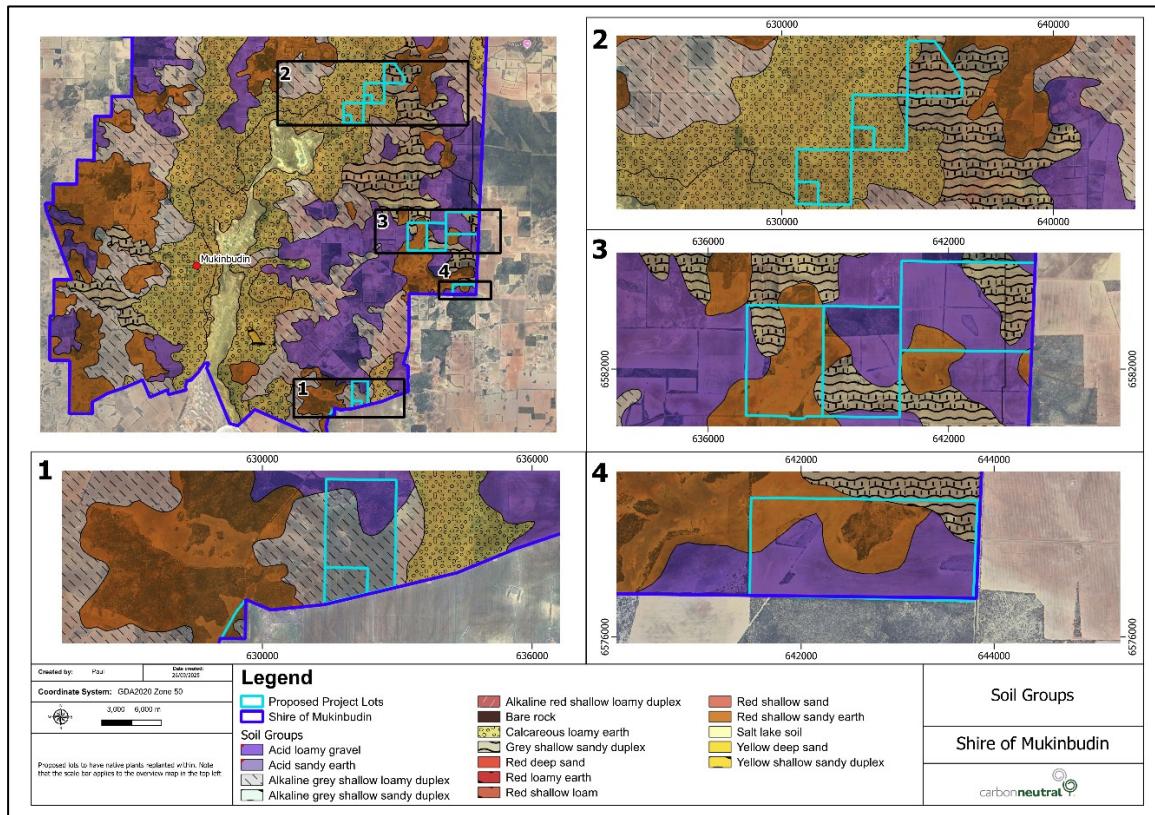
No threatened ecological communities are known to occur on the property. However, the remnant vegetation that does occur on the properties likely would contain areas that would meet the requirements to qualify as the Eucalypt Woodlands of the Western Australian Wheatbelt Threatened Ecological Community. None of the proposed project activities will impact upon the remnant vegetation on the properties.

5. Land and Agricultural Capability

Soil Systems

The soils vary across the proposed project extent, but are broadly characterised as sand or loamy earths, loamy duplexes and loamy gravel. Figure 2 summarises the soil distributions across the project.

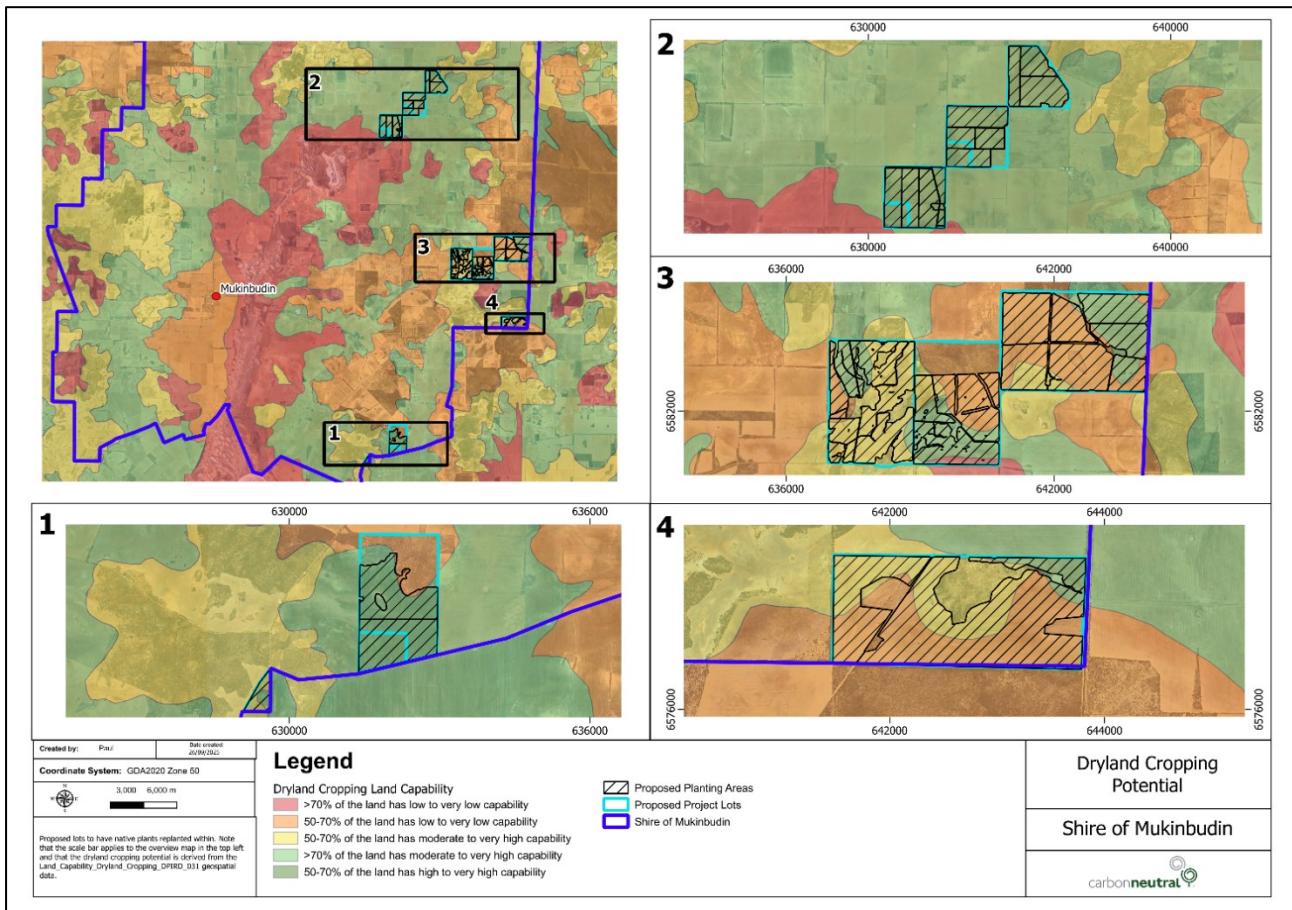
Figure 2: The soil types found in the project



Dryland Cropping

The DPIRD assessment below shows a significant proportion of the project area contain land that is classed as “50-70% has low to very low capability”. Other parts of the land are classified as either “50-70% has moderate to very high capability” and a lesser amount of “>70% has moderate to very high capability”.

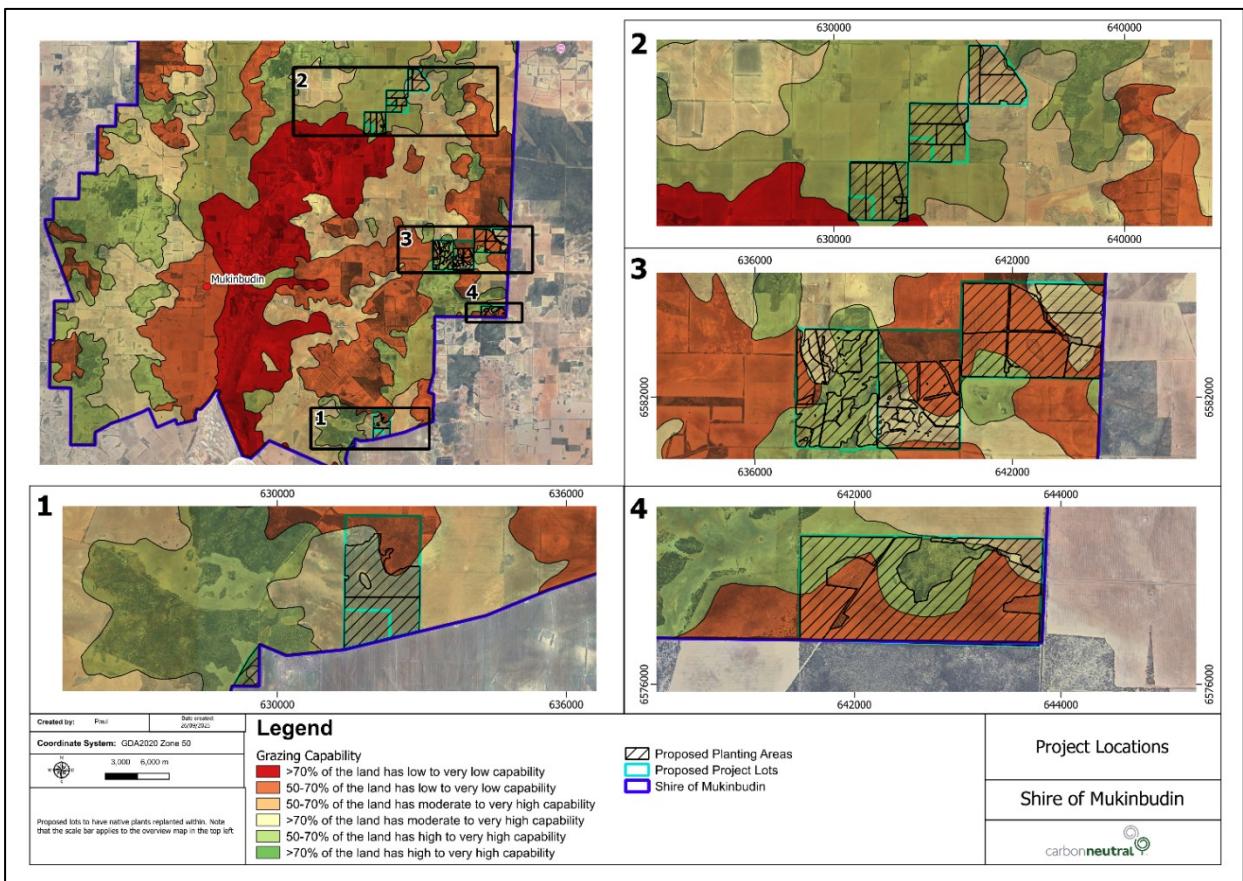
In general terms, the proposed lots are considered less attractive components of the total agricultural area currently being operated.



Grazing

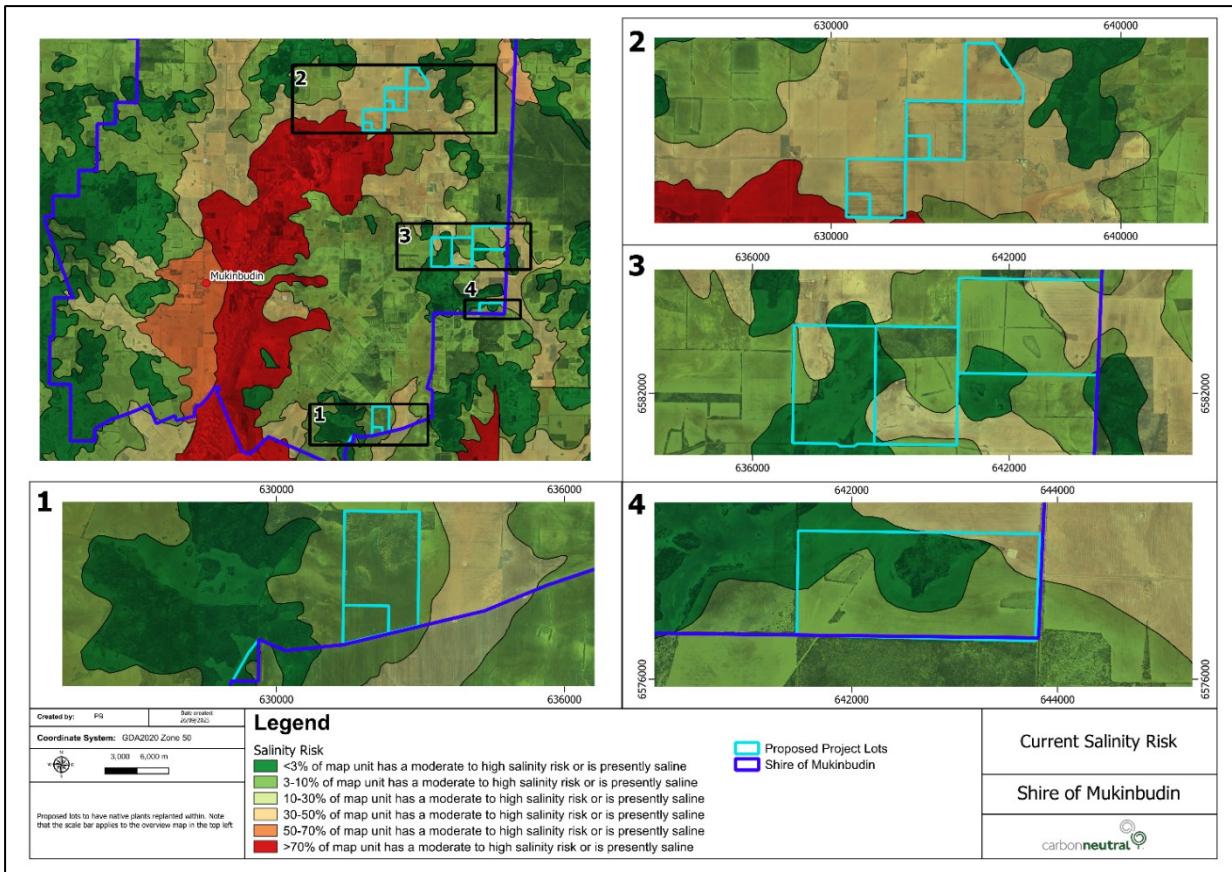
The DPIRD Assessment below shows significant portions of the project area contains land assessed as “50-70% has low to very low capability”, and “50-70% has high to very high capability”.

Once the trees are sufficiently established to withstand grazing pressures, the managed grazing of stock can be facilitated across the project area.



Salinity

Surface soil salinity is not known to occur over the proposed project area, although there are some high-risk salinity areas near the northern properties of the project area. Revegetation will reduce salinity risk on and beyond the properties' boundaries.



Arrangements for Ongoing Agriculture

Carbon Neutral understands the general declining population bases and loss of agricultural production from a range of causes. It is Carbon Neutral's philosophy to contribute positively to addressing these issues by including ongoing agricultural production wherever appropriate and sensible on its tree farms and offering carbon farming as an alternative income stream to contribute to local communities.

Once the forest is sufficiently matured (~3 years), the area can be used to allow grazing and harvesting forest products such as honey. There are also various design options that allow for reservation of land area for cropping and grazing, such as planting in belts along fence lines and to square up paddocks. Although not intended on the current application, practical ongoing broadacre cropping is usually incorporated into the design of our projects in two main ways:

- Keeping tree plantings to edges of cropping areas and to square up paddocks, and
- Where belts are within cropping areas, these are separated sufficiently for multiple passes of modern broadacre equipment in between the belts.

6. Fire Management Plan

Context

The aim of this Fire Management Plan is to outline fire prevention and response measures for the project in alignment with the Shire of Mukinbudin Firebreak Notice, Local Planning Scheme No. 4 (TPS4), and relevant State Codes of Practice.

The project area is predominantly bordered by agricultural properties to the south and remnant vegetation to the east, with rangeland to the north. There are no significant industrial fire risks in the vicinity. The site design considers firebreak placement, water availability, and access routes to minimise bushfire risk to surrounding land and infrastructure.

Responsibilities and Contact Details

Carbon Neutral is responsible for:

- Maintaining firebreaks and access tracks in accordance with the Shire of Mukinbudin Firebreak Notice and Guidelines for Plantation Fire Protection (FESA, 2011).
- Ensuring a minimum supply of 50,000 L per property, with appropriate firefighting couplings and signage.
- Contributing where possible to fire response with local authorities, including the CBFCO and DFES.
- Providing the farm manager with training and resources to manage onsite fire risk and assist neighbouring properties as required.

Table 3: Fire contact details (current as of 2025/2026 fire season)

| Title | Name | Phone |
|---------------------------------|---------------|--------------------------------|
| Carbon Neutral – COO | Nevin Wittber | 0407 773 584 |
| Farm Manager (interim) | Rob Cooling | 0417 178 680 |
| CBFCO | Andrew Sprigg | 0417 987 971 |
| Deputy CBFCO | Matt Silinger | Shire office: 08) 9047 2100 |
| DFES Fire Emergency | | 000 |
| DFES Emergency Information Line | | 133 337 |

Firebreaks and Access Tracks

Firebreaks will comply with the Shire Firebreak Notice:

- 10m external firebreaks where planting is adjacent to property boundaries.
- 15m setback of tree planting on all external boundaries.
- 6m internal firebreaks to maintain planting areas to a maximum size of approximately 150ha.
- Internal access tracks of ~4m width to allow safe movement of firefighting vehicles.

Firebreaks will be formally inspected biannually in winter and summer to inform required maintenance activities.

An updated Fire Management Plan will be submitted to the Shire once planting is complete to show the fire break arrangement and water supplies consistent with the above criteria. A more concise version of the Bushfire Management Plan will be stored at the main entrance to the project sites, along with a detailed map for that site.

Water Supplies and Fire Infrastructure

Water supplies of at least 50,000L will be established across the sites, with good access and couplings for use during fire suppression. Water points will be signposted on site and included on site maps provided to the local fire Community Emergency Services Manager (CESM) in georeferenced format.

Significant Infrastructure

There is no significant infrastructure on or adjacent to the property that needs specific fire protection measures.

Fire Response Arrangements

In the event of a fire, Carbon Neutral will:

1. Notify local fire authorities immediately.
2. Deploy the farm manager to support fire suppression efforts.
3. Assist neighbouring landowners if requested, in accordance with WA bushfire response protocols.
4. Liaise with local brigade to identify any other ways Carbon Neutral can assist the fire suppression effort.

All fire management practices will adhere to *Guidelines for Plantation Fire Protection (FESA, 2011)*, *Code of Practice for Timber Plantations in Western Australia (2014)*, and *Shire of Mukinbudin Firebreak Notice 2025*. This integrated approach ensures compliance with local and State fire safety requirements while mitigating bushfire risk to project infrastructure, adjacent properties, and the wider community.

7. General Property Management

Staffing

Carbon Neutral will employ a Farm Manager based in the Eastern Wheatbelt (and likely a second Farm Manager as the project progresses), whose responsibility it is to keep in contact with neighbours, maintain infrastructure and monitor firebreak conditions.

The Farm Manager is contactable outside normal working hours and can assist with any query or activities across the project area. Until a local farm manager is employed, our Perenjori-based farm manager, supported by existing Carbon Neutral staff will manage these activities.

Site Inspections and Maintenance

Due to the projects legislated requirement to manage weeds and pests, the planting areas will be monitored on an ongoing basis. If any pest or disease outbreaks are identified, they will be swiftly dealt with in accordance with the detailed sections outlined below.

Note that Carbon Neutral will inform neighbours in writing of any activities that involve the placement of poisons. A reasonable time between the provision of written notice to neighbours and the poison use will be provided to ensure any specific concerns by neighbours can be accommodated.

Pest and Vermin Management

Carbon Neutral will implement prescribed control measures to control declared pests on the land including foxes, rabbits, wild dogs, and pigs as required under the Biodiversity and Agriculture Management Act 2007 (WA). Carbon Neutral will maintain its membership to the Eastern Wheatbelt Biosecurity Association (and RBG's in other localities where properties are owned) and continue to support community wide control measures through that group.

Carbon Neutral engages local professional shooters across its properties to assist it with controlling pests and vermin and maintaining other vertebrate numbers to acceptable levels; this works in tandem with a baiting regime for cats and foxes.

The farm manager is responsible for monitoring the property for pest, vermin and other vertebrate numbers and provide recommendations and advice about the appropriate control measures needed to be undertaken.

Complaint Handling

Complaints can be lodged through the “Feedback” link on Carbon Neutral’s website, submitted to the email address contactus@carbonneutral.com.au, the office phone number: 1300 851 211, after hours: (08) 9200 4247, or to one of the contact numbers listed in this Plan.

The complaint will be actively addressed and progressed toward closure.

Attachment A – Property List

| Land ID | Deposited Plan | Lot No | Area (ha) | Ownership |
|---------|----------------|--------|-----------|--------------------------------------|
| 1833410 | 225448 | 14324 | 336.4 | Apache Investments Australia Pty Ltd |
| 1834752 | 225520 | 15953 | 340.6 | Apache Investments Australia Pty Ltd |
| 1839525 | 225448 | 21424 | 64.8 | Apache Investments Australia Pty Ltd |
| 1840776 | 225430 | 23166 | 64.8 | Apache Investments Australia Pty Ltd |
| 1841412 | 148346 | 24080 | 25.1 | Apache Investments Australia Pty Ltd |
| 1841781 | 225520 | 24606 | 64.8 | Apache Investments Australia Pty Ltd |
| 1842308 | 154156 | 25325 | 734.6 | Apache Investments Australia Pty Ltd |
| 1842428 | 154881 | 25482 | 530.2 | Apache Investments Australia Pty Ltd |
| 1972255 | 225520 | 315 | 64.8 | Apache Investments Australia Pty Ltd |
| 1972644 | 225520 | 803 | 329.7 | Apache Investments Australia Pty Ltd |
| 1972651 | 225520 | 810 | 340.4 | Apache Investments Australia Pty Ltd |
| 3395669 | 300394 | 200 | 529.4 | Apache Investments Australia Pty Ltd |
| 3916956 | 65468 | 22 | 239.7 | Apache Investments Australia Pty Ltd |