

October 2025



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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 Nungarin. 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

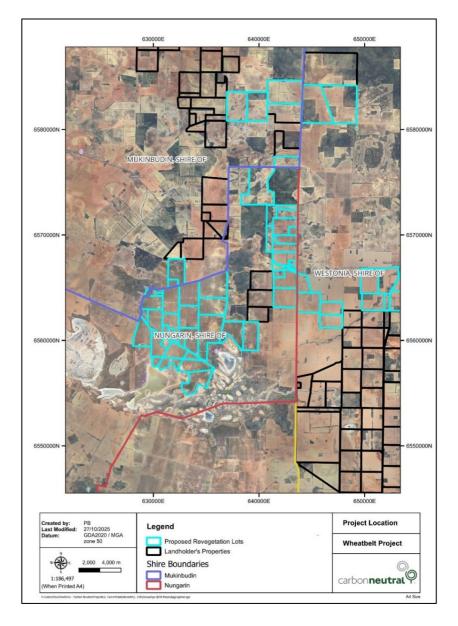


Table 1: Title details

Land ID	Deposited Plan	Lot No	Area (ha)	Ownership
1833403	225431	14317	352.5	Apache Investments Australia Pty Ltd
1833404	225430	14318	285.9	Apache Investments Australia Pty Ltd
1833405	225430	14319	246.9	Apache Investments Australia Pty Ltd
1833422	225459	14336	69.1	Apache Investments Australia Pty Ltd
1833423	225459	14337	164.7	Apache Investments Australia Pty Ltd
1833424	225459	14338	307.5	Apache Investments Australia Pty Ltd
1833425	225459	14339	394.2	Apache Investments Australia Pty Ltd
1833427	225460	14341	721	Apache Investments Australia Pty Ltd
1833428	225460	14342	332.4	Apache Investments Australia Pty Ltd
1833429	225460	14343	262.4	Apache Investments Australia Pty Ltd
1833430	225460	14344	387.1	Apache Investments Australia Pty Ltd
1834274	225460	15370	395.8	Apache Investments Australia Pty Ltd
1834275	225460	15371	391.3	Apache Investments Australia Pty Ltd
1834276	225460	15372	572.4	Apache Investments Australia Pty Ltd
1834772	225555	15975	310.5	Apache Investments Australia Pty Ltd
1834773	225555	15976	213.8	Apache Investments Australia Pty Ltd
1834774	225555	15977	241	Apache Investments Australia Pty Ltd
1834775	225554	15978	298.4	Apache Investments Australia Pty Ltd
1834776	225554	15979	401	Apache Investments Australia Pty Ltd
1834783	225554	15986	385.6	Apache Investments Australia Pty Ltd
1834784	225554	15987	381.3	Apache Investments Australia Pty Ltd
1835067	225460	16318	64.8	Apache Investments Australia Pty Ltd
1835068	225460	16319	64.8	Apache Investments Australia Pty Ltd
1835423	225459	16749	64.7	Apache Investments Australia Pty Ltd
1840195	225460	22350	64.8	Apache Investments Australia Pty Ltd
1840306	225430	22477	64.8	Apache Investments Australia Pty Ltd
1840614	225555	22971	64.7	Apache Investments Australia Pty Ltd
1840627	225555	22989	35.6	Apache Investments Australia Pty Ltd
1841475	148526	24174	162	Apache Investments Australia Pty Ltd
1841697	150324	24475	416.6	Apache Investments Australia Pty Ltd
1841748	225554	24542	64.8	Apache Investments Australia Pty Ltd
1842105	150445	25074	2	Apache Investments Australia Pty Ltd
1843129	158877	26746	161.8	Apache Investments Australia Pty Ltd
1843273	158903	26950	64.3	Apache Investments Australia Pty Ltd
1844143	168681	28046	83.1	Apache Investments Australia Pty Ltd
1844144	168680	28047	145.7	Apache Investments Australia Pty Ltd
1844209	209358	28153	161	Apache Investments Australia Pty Ltd
1844438	212286	28445	11	Apache Investments Australia Pty Ltd
3916954	65468	20	825.2	Apache Investments Australia Pty Ltd

Contact Details

Table 2: Contact details

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

Land and Agricultural Capability

DPIRD assessments show a significant proportion of the project area contain land that is classed at varying levels of suitability for broadacre cropping, and have a good 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 Nungarin Local Planning Scheme No. 1* (Gazettal date unverified). 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. 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 Nungarin'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 to 2028

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 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 Site cultivation, seedling planting following significant rain.

Aug/Sep Pest monitoring and treatment as required.

Oct/Nov Monitoring for insect impact, follow up spraying.

Following Year 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 Nungarin Local Planning Scheme No. 1 (Gazettal date unverified) and supporting Local Laws and notices, particularly in the following respects:

- 1. Encouraging the sustainable use and management of rural land and natural resources, consistent with the Scheme's intent to protect and enhance the environmental qualities of the district's rural areas.
- 2. Supporting the long-term viability of agriculture while facilitating complementary rural uses such as revegetation, tree farming, and carbon sequestration on marginal or degraded land, in accordance with the Scheme's objectives for the Rural zone.
- 3. Protecting remnant vegetation, promoting biodiversity, and improving landscape connectivity in line with the Scheme's provisions to safeguard areas of environmental significance and maintain ecological balance.
- 4. Reducing soil erosion, salinity, and land degradation by establishing permanent vegetation on low-productivity areas, contributing to the Scheme's goal of sustainable land use and environmental management.
- 5. Ensuring compatibility with surrounding agricultural operations and land uses by integrating revegetation and forestry plantings in a manner that preserves the rural character and productive capacity of the Shire.
- Avoiding adverse impacts on water resources, infrastructure, or cultural heritage sites, consistent with the Scheme's objectives for protecting the natural environment and community assets, and in alignment with relevant State legislation such as the Biosecurity and Agriculture Management Act 2007 (WA) and the Planning and Development Act 2005 (WA).
- 7. Complying with fire management obligations under the Shire of Nungarin Firebreak Notice and related Local Laws by maintaining appropriate firebreaks, access corridors, and defensible buffers around planted areas, in keeping with the Scheme's emphasis on hazard mitigation and community safety.

No additional local planning approvals are envisaged beyond the standard statutory obligations under the relevant State legislation and the Shire's annual Firebreak and Bush Fire Notices.

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 is potentially one (1) area of Aboriginal Heritage on the broader project area. Our standard practice is to identify these areas using the available government resources and apply a 50-metre exclusion buffer around the sites to ensure no disturbance is caused.

Threatened Ecological Communities (TECs)

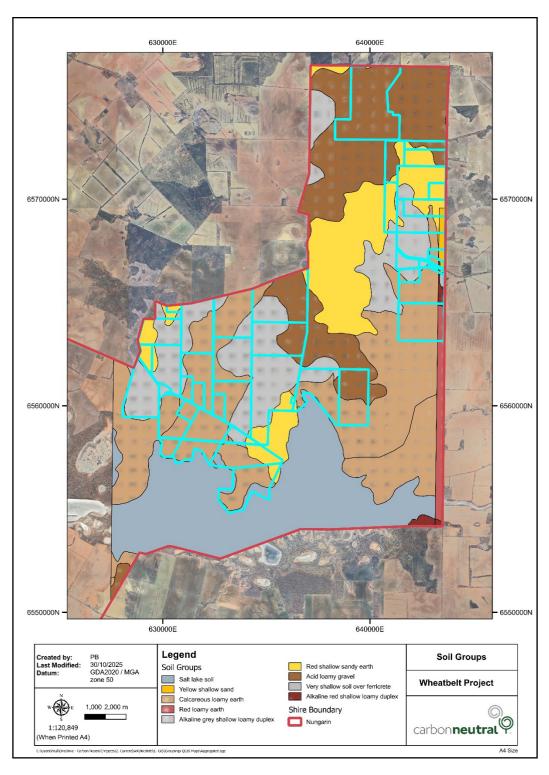
No threatened ecological communities are known to occur on the property. However, the remnant vegetation that does occur on the properties likely would contain areas that would meet the requirements to qualify as the Eucalypt Woodlands of the Western Australian Wheatbelt Threatened Ecological Community. 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.

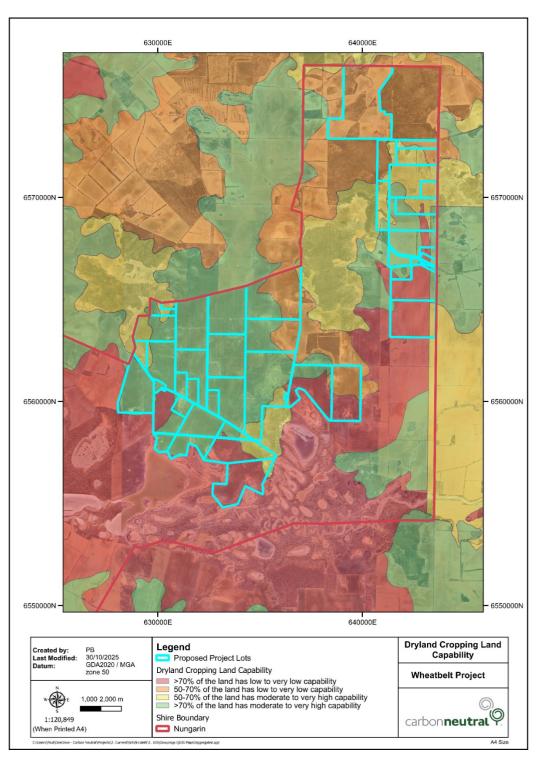
Figure 2: The soil types found in the project



Dryland Cropping

The DPIRD assessment below shows a mix of capabilities across the project area. A significant proportion of the northern areas contain land that is classed as "50-70% has low to very low capability". The southern parts of the project area largely classified as ">70% has moderate to very high capability".

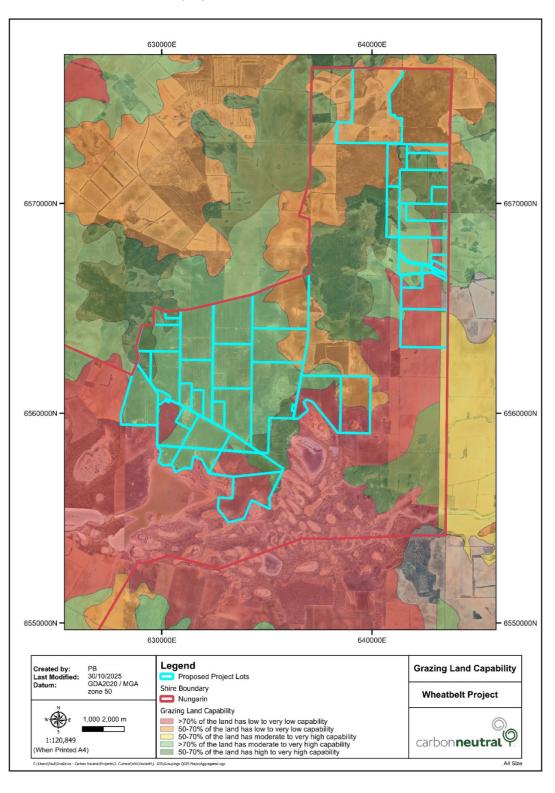
In general terms, the proposed lots are considered less attractive components of the total agricultural area currently being operated.



Grazing

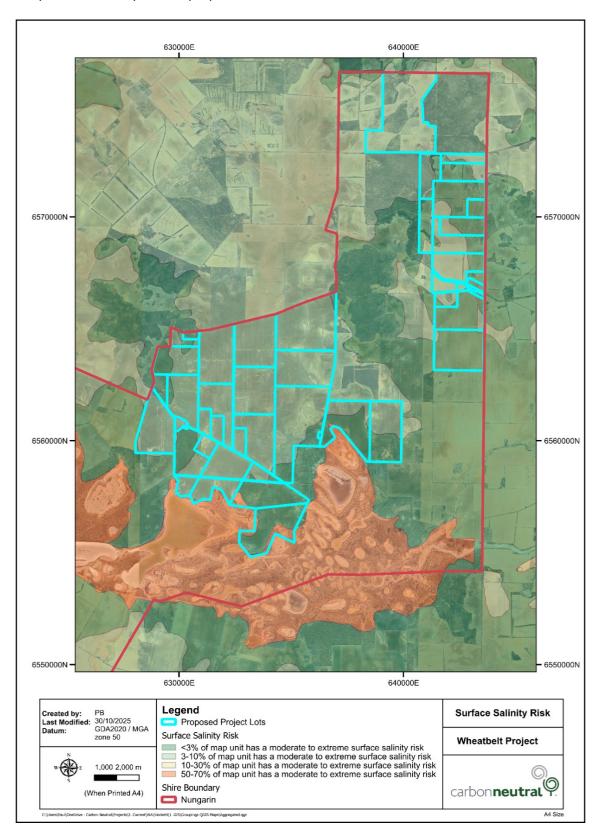
The DPIRD Assessment below shows significant portions of the project area contains land assessed as very suitable for grazing production.

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 is some high risk salinity areas near the southern 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 Neutrals 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 *Shire of Nungarin – Fire Prevention and Fuel Load Notice 2025/2026, Shire of Nungarin – Fire & Emergency / Bush Fire info and permit guidance* 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 Nungarin Fire
 Prevention and Fuel Load Notice 2025/2026, Shire of Nungarin Fire & Emergency / Bush
 Fire info and permit guidance.
- 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	Paul Cosson	0438 367 024
Deputy CBFCO	David Dhu	0498 2270 990
DFES Fire Emergency		000
DFES Emergency Information		133 337
Line		

Firebreaks and Access Tracks

Firebreaks will comply with the *Shire of Nungarin – Fire Prevention and Fuel Load Notice* 2025/2026, *Shire of Nungarin – Fire & Emergency / Bush Fire info and permit guidance*:

- 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 Nungarin's Firebreak Order*. 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.s

The complaint will be actively addressed and progressed toward closure.