

Land and Public Works Legislation Amendments
Department of Planning, Lands and Heritage
Perth WA 6001
By email: LAA2022@dplh.wa.gov.au

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18 November 2022

Dear Land and Public Works Legislation team,

RE: Supplementary submission to Proposed Policy Framework, Diversification Leases on Crown Land

Following our face-to-face discussion on 2 November 2022, the Australian Land Conservation Alliance (ALCA) welcomes the suggestion to provide a supplementary submission to the Western Australian Government's consultation on the *Proposed Policy Framework Guiding the Use of Diversification Leases on Crown Land*.

Please note that ALCA is happy for this supplementary submission to be published in full.

About the Australian Land Conservation Alliance

The Australian Land Conservation Alliance is the peak national body representing organisations that work to conserve, manage and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity and influence of private land conservation to achieve a healthy and resilient Australia. Our eleven members are (with those operating in WA in bold):

- **Australian Wildlife Conservancy**
- Biodiversity Conservation Trust NSW
- **Bush Heritage Australia**
- **Greening Australia**
- **Landcare Australia**
- Nature Foundation
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- **The Nature Conservancy Australia**
- Trust for Nature (Victoria)

ALCA land conservation efforts stretch across over 3 million square kilometres with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$260 million. Together, ALCA and its members address some of the most pressing conservation issues across the country, including restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and funding and using nature-based solutions to tackle climate change.

Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat, with its many positive spillover effects for community, wellbeing, and food security. We seek to demonstrate the role and value of private land conservation as a cornerstone of the Australian economy.

ALCA has two members who currently hold pastoral leases and manage land for conservation within Western Australia: the Australian Wildlife Conservancy and Bush Heritage Australia.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.

Supplementary recommendations

In addition to ALCA's earlier recommendations:

1. That Paragraph 8 of the Policy Framework be rewritten as follows [**additions in bold**]:

Where there are competing applications for a diversification lease over the same area, the process for identifying a preferred proponent will be at the Minister for Lands' discretion, taking into account a number of factors including:

- a. the benefits to the State, the relevant region or locality;
- b. the rights and interests of existing land users/interest holders;
- c. the value to Aboriginal and Torres Strait Islanders of the proposed activities;**
- d. the benefits to biodiversity conservation;**
- d. ensuring a diversity of investment; and
- e. any other considerations the Minister may deem relevant.

2. That a new Paragraph 20 under the 'Permitted Land Use' section of the Policy Framework be added as follows [**additions in bold**, with subsequent paragraphs renumbered as relevant]:

20. A diversification lease may be granted for a sole land use (such as, for example, biodiversity conservation).

Thank you again for the opportunity to contribute to the Western Australian Government's consultation on the *Proposed Policy Framework Guiding the Use of Diversification Leases on Crown Land*.

ALCA looks forward to ongoing engagement with the Western Australian Government to ensure that its amendments to *Land Administration Act 1997* deliver for leaseholders, guarantee existing investments in conservation on Crown land, and provide the certainty and pathways required to drive and leverage much-needed commercial, philanthropic and government investment in conservation.

If you have questions regarding the submission, please do not hesitate to contact ALCA via michael@alca.org.au (Mr Michael Cornish, Policy Lead).

Yours sincerely,



Dr Jody Gunn

Chief Executive Officer

Australian Land Conservation Alliance