



30 November 2022

Registrar of Aboriginal Sites

Locked Bag 2506
PERTH WA 6001

VIA EMAIL ONLY: registrar@dphl.wa.gov.au

**RE: NOTICE OF ASSESSMENT ABORIGINAL HERITAGE PLACE ID 39200
(GASCOYNE & LYONS RIVER)**

The Pastoralists and Graziers Association of WA (PGA) is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions of Western Australia.

The PGA's current pastoral membership numbers equate to 84% of all pastoral leases, excluding First Nations and conservation leases. In addition, the PGA also represents a significant portion of rural and regional freehold landowners engaged in primary production throughout the State.

As the peak organisation representing Western Australian primary land holders, we would like to lodge our objection to the assessment by the Aboriginal Cultural Material Committee (ACMC) on Aboriginal Heritage Place 39200 (Gascoyne and Lyons River).

According to the Fact Sheet, *'Procedural fairness is afforded to all landowners whose land will be affected by this process. This notice is to let all affected landowners know that a decision is being made about a portion of their land and to let them know that should they wish to do so they can provide comments.'*

The PGA notes that the only information provided for landowners is a limited Fact Sheet and a map of the proposed assessment area. There is no further information available, including the original DPHL assessment of the 'Gascoyne and Lyons River', which would allow any stakeholder to make a fair and considered submission on the assessment. As such, this shows a definite lack of 'procedural fairness' for all landowners, as stipulated in the Fact Sheet.

Pastoralists & Graziers Association of Western Australia (Inc)

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There is also no clarity on the responsibility for management of the areas once granted. For example, who is responsible for the Biosecurity, fire and feral control of the lands associated with the Heritage places once granted. Clarification is required, as there will be a direct impact on any landholders where their boundaries are adjacent to Aboriginal Heritage Places.

Given that the purpose of the AHA is to protect aboriginal heritage within Western Australia, which does not affect property ownership or land access, and that any future activities by landowners may require a need for approval from the AHA, it is imperative that landowners be provided with all relevant information on the assessment prior to providing comment.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Tony Seabrook', with a long, sweeping horizontal line extending to the right.

Tony Seabrook
PGA President