WTO Proposal

Xanthorrhoea Semiplana SPP Tateana.

Yacca Gum

Updated submission for renewal, dated 20 October 2023.

Table of Contents

1. Title and Introduction 2
1.1 Scientific name(s) 2
1.2 Common name 2
1.3 Location of harvest 2
1.4 Description of what is being harvested 2
1.5 Species protection 2
2. Statement of general goals/aims 2
3. Harvest Details 3
3.1 Area 3
3.2 Land Ownership 3
3.3 Harvest Quantity 3
3.4 Methods of Harvesting 3
3.5 Timeframe of Harvesting 4
4. Impact of Harvest 4
5. Monitoring and Assessment 4
6. Management strategies 4
7. Compliance 5
8. Additional Requirements 5
8.1 The Kangaroo Island Assassin Spider 5
8.2 Kangaroo Island Narrow-leaved Mallee Woodland 5
8.3 EPBC-listed species and communities 6
8.4 The Trailing Hop-bush 6
8.5 Phytophthora Cimmamomi 6

1. Title and Introduction

1.1 Scientific name(s)

Xanthorrhoea Semiplana SPP Tateana.

1.2 Common name

Yacca Gum.

1.3 Location of harvest

Kangaroo Island, South Australia.

1.4 Description of what is being harvested

Dead Xanthorrhoea Semiplana SPP Tateana single plant stumps/trunks (no twins, bunches or clutches).

1.5 Species protection

For dead plant stumps/trunks, there is no special protection under State or Federal legislation to our knowledge.

Because they are dead stumps/trunks, they will not be taken in contravention of the national Parks and Wildlife Act 1972 or the Native Vegetation Management Act 1991.

2. Statement of general goals/aims

The objective is to collect single dead Yacca Gum plant stumps/trunks from privately owned properties. Once collected, these dead plant stumps/trunks will then be processed into a coarse grade material for bagging and export.

This business has a long history, and we were very pleased to re-establish the permit 3 years ago. While we have been able to conclude some export shipments, the Island has been devastated initially with fires, and then hit hard with the COVID pandemic.

Hopefully, we have more stable conditions over the next 3-year period to continue building this business with our long-standing customer, who has been extremely supportive during these difficult times. We also continue to receive enquiries from other customers and hope to be in a position shortly to supply them as well.

3. Harvest Details

3.1 Area

Private properties located on Kangaroo Island.

It is difficult to provide harvest maps at this stage, as it is a continual process to locate new privately owned properties with dead yacca and gain owner consent to harvest the trunks/stumps. However, we are nominating the property locations with our annual harvest reporting requirement.

3.2 Land Ownership

All properties are privately owned.

3.3 Harvest Quantity

Target requirement will slightly increase to 50-80 metric tonnes of coarse granules Yacca Gum, pending stable conditions.

We are providing these details with our annual reporting requirement but similar to question 1, it is difficult to nominate this information prior to the properties being inspected and dead yacca trunks/stumps identified. The amount harvested could vary, depending on what is actually found on each site. Normally most of the yacca inspected is dry enough and has been dead long enough to harvest but if the stumps/trunks are within the 1-3 year range following their death, then we will return in another year or two to collect.

The number of collected yacca stumps/trunks required for a tonne of Yacca gum would vary a lot depending on size and how long the Yacca plant has been dead. Once the Yacca plant has been dead for three or more years then they become more and more brittle with each year that passes. This means they slowly fall apart from disturbances such as animals brushing against them or the weather etc. Therefore, a lot of Yacca collected these days can be less than half their original height as the rest of the trunk has disintegrated. As the size and height of the yacca stumps/trunks varies greatly, they may yield from as little as 2kg and up to 20kgs per stump/trunk.

3.4 Methods of Harvesting

Dead yacca stumps/trunks are picked by hand, loaded onto vehicles for removal from the harvest site and then transported to where a stationary milling machine is located. The red yacca gum is then milled out of the dead yacca stumps/trunks and collected in bags ready for transportation. The mill is currently located at Lots 110 & 111 HD Seddon property.

A thorough inspection is undertaken when the dead yacca trunks/stumps have been identified and the property owner consent has been granted. Typically, when yacca dies it takes 2-3 years for it so be soft and dry enough to harvest for milling. It is not possible to harvest/mill live green yacca trunks/stumps, so there reason to be harvesting anything other than dead yacca trunks/stumps.

3.5 Timeframe of Harvesting

Harvesting is summer and autumn each year when the dead yacca stumps/trunks are dry, so they can be milled to remove the red yacca gum.

4. Impact of Harvest

There will be no impact on any other Yacca plants/species nor the ecosystem now and into the future, as only dead stumps/trunks Yacca plants are collected by hand.

We believe there is no impact from the harvest on the environment, ecosystem, landscape or the living Yacca plants and this is a manual process. Only the dead yacca stumps/trunks are collected by hand and carried by hand in tubs or wheelbarrows along existing animal paths and loaded onto a vehicle parked on the edge of the paddock, next to the scrub/vegetation line. This also means that the collection is limited to easy walking access areas and the distance you are willing to carry loaded tubs back.

Because of the nature of the yacca stumps/trunk becoming brittle after a few years and slowly falling apart, they do not make a good long-term home for any animal species. Therefore, harvesting the dead yacca stumps/trunks is not taking an important home away from any animal or insect species. Over the many years of dead yacca collecting we have only found short-term opportunistic type animals/insects like mice, ants, spiders and the odd bee hive, and for obvious reasons its best keep well away from bee hives.

5. Monitoring and Assessment

Against each order an application for consent to export will be requested via the departments Wildlife's trade permits online services. Follow the export of product, the export permit will be acquitted through the same online service.

Each year, we will submit an annual report to the department which will outline each property the dead yacca stumps/trunks were harvested from, the period/date of collection and volume.

6. Management strategies

We do not expect to detect any population changes from this activity, as only dead Yacca Gum plant stumps/trunks are sourced.

7. Compliance

We will continue to adhere to the special requirements laid out with our proposal application/approval, with regarding to harvesting, monitoring and reporting. All activities conducted will be in alignment with the Department of Climate Change, Energy, the Environment and Water's requests.

We will also act responsibly and in accordance with the Kangaroo Island Community Recovery Plan 2020-2022.

8. Additional Requirements

As requested by the Department of Climate Change, Energy, the Environment Ans Water dated 6th September 2023 (below in *italic*).

8.1 The Kangaroo Island Assassin Spider

The Kangaroo Island Assassin Spider (Zephyrarchaea austini) is Critically Endangered under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Conservation Advice for the species was released in April 2022. The advice identifies habitat which is considered critical and potentially important for the species (Map 1, p. 5). In your proposal, please note if harvesting locations will exclude any critical and important habitat for this species.

Based on the habitat type and the very small areas where these spiders are found on the Island, we note half of those area's identified are park around Billy goat Falls and then west of that park, in very rugged and hard to access country.

We cannot collect Yacca from parks and we will avoid the other identified areas listed on our authority's website. Most areas identified are very rugged and likely inaccessible.

From our understanding, these spiders have only been found in a couple very small areas on the Island. They also like a specific damp habitats along creeks, which will also make it much easier for us to avoid them altogether.

8.2 Kangaroo Island Narrow-leaved Mallee Woodland

Kangaroo Island Narrow-leaved Mallee (Eucalyptus cneorifolia) Woodland is threatened and provides important habitat for a number of Kangaroo Island bird species (including the Shy Heathwren (Kangaroo Island), Kangaroo Island Brown-headed Honeyeater, South Australian Bassian Thrush, Kangaroo Island White-eared Honeyeater). In your proposal, please note if harvesting will occur in Kangaroo Island Narrow-leaved Mallee Woodland.

The Kangaroo Island Narrow Leaf Mallee grows mainly on the eastern end half of Kangaroo Island, and this type of country typically has very little Yacca plants growing there. We will not be harvesting from this area.

8.3 EPBC-listed species and communities

Much of Kangaroo Island's riparian areas (creek/stream/river banks) support a number of EPBC-listed species and communities, including the Kangaroo Island Spider-orchid, Spiral Sun-orchid, and Mount Lofty Speedwell. In your proposal, please note if harvesting locations will exclude creek habitat, and if so, what buffer will be implemented to ensure the species are not inadvertently trampled during harvesting activities.

The Spiral Sun Orchard's growing season is Aug – Oct, and the Kangaroo Island Spider Orchard's season is Sept – Nov. The Yacca gum harvest season is only conducted during the dryer weather periods, from Dec – May. Therefore, the chance of seeing or damaging any of these species is extremely unlikely. Similar to the Assassin Spiders preferring specific habitats along creeks, this will make it easier for us to avoid them altogether.

The Mount Lofty Speedwell and the Trailing Hopbush are both large sized plants. As our Yacca harvesting is done on foot and by hand, collecting the dead Yacca in tubs, no other plants or vegetation will be impacted by our harvesting activities.

Regarding creek habitat's, any dense type of habitat areas will not be entered/harvested from. In more open/smaller creek habitat's, we will only be entering on foot into safe and open area's and do not expect this to interrupt any specie communities. Further to the method of harvesting and impact outlined in the above sections 3.4 and 4, it is worth noting that our harvesting is undertaken with every precaution to avoid any damage of vegetation or wildlife species.

8.4 The Trailing Hop-bush

The Trailing Hop-bush (Dodonaea procumbens) is listed as Vulnerable under the EPBC Act and is known to grow specifically in Yacca thickets. In your proposal, please discuss how you will identify this species and avoid damaging and removing it during the harvesting process.

See above 8.3

8.5 Phytophthora Cimmamomi

Yacca is a known host of Phytophthora cinnamomi, a plant pathogen which is spread through infected soil and plant material. The disease, Phytophthora Dieback, is known to cause large-scale dieback in a variety of plant species. The Australian Government's Arrive Clean, Leave Clean guidance document provides guidance on how to prevent and manage spread in Phytophthora cinnamomi. In your proposal, please indicate if you will implement the Arrive Clean, Leave Clean guidelines.

To prevent the spread of Phytophthora Cinnamom, all harvesters will be instructed to follow the 'Arrive Clean, Leave Clean' guidelines which will be provided to them prior to harvesting. Additionally, our harvesting guidelines will also make mention of the above raised authority concerns (8.1-8.5), so we remain proactive with educating our harvesters on these important Environmental matters.