Yamatji Marlpa
ABORIGINAL CORPORATION

Our Ref: GEN–033 Submissions
Your Ref: ACHA Regulations & Guidelines Phase 3
Office: Perth

Date: 6 January 2023

To: Aboriginal Cultural Heritage Reference Implementation Team
Department of Planning, Lands and Heritage
140 William Street
PERTH Western Australia 6000

By email: achimplementation@dplh.wa.gov.au

Dear Implementation Team

REF: Submission in relation to the Phase 3 consultation for the *Aboriginal Cultural Heritage Act 2021* regulations and guidelines

Yamatji Marlpa Aboriginal Corporation (YMAC) is the Native Title Representative Body (NTRB), delivering native title and other services across the Pilbara, Mid West, Murchison and Gascoyne regions of Western Australia. YMAC is run by a First Nations board of directors, representing several native title groups, each of whom have their own language, culture, traditions and protocols. YMAC services include native title claim and future act representation; heritage services; executive office, community, and economic development assistance; land administration, and natural resource management support.

We attach our submission in relation to the draft documents released for the Phase 3 consultations.

YMAC is happy for this submission to be published online, with my signature redacted.

Should this submission generate any questions or concerns, please contact me via Executive Assistant, Dionne Lamb, in our Perth office on 08 9268 7000 or email dlamb@ymac.org.au.

Yours sincerely,

Signature supplied with submission

Simon Hawkins
Chief Executive Officer

PERTH
Level 8,
12 The Esplanade
Perth WA 6000

PO Box 3072
249 Hay Street
Perth WA 6892

Freecall: 1800 270 709

T (08) 9268 7000
F (08) 9225 4633

GERALDTON
171 Marine Terrace
Geraldton WA 6530

PO Box 2119
Geraldton WA 6531

T (08) 9965 6222
F (08) 9964 5646

HEDLAND
8 Manganese Street
Wedgefield WA 6721

PO Box 2252
South Hedland
WA 6722

T (08) 9160 3800
F (08) 9140 1277

BROOME
Shop 2/24
Clementson Street,
Broome WA 6725

PO Box 2059
Broome WA 6725

T 1800 270 709

CARNARVON
4 Francis Street
Carnarvon WA 6071

PO Box 1424
Carnarvon WA 6071

T (08) 9965 6222
F (08) 9964 5646

Yamatji Marlpa
Aboriginal Corporation
is a Native Title
Representative Body
ICN 2001
ABN 14 011 921 883

Yamatji Marlpa
ABORIGINAL CORPORATION

KNOWLEDGE PARTNERSHIPS

Submissions on the Aboriginal Cultural Heritage Act 2021 – Co-design Phase 3 Regulations and Guidelines

6 January 2023

Table of contents

Executive summary 3
Knowledge Holder Guidelines 3
Prescribed timeframes 4
Local ACH Service (Fees) Guidelines 5
Protected Area Order Guidelines 6
ACH Management Code 6
Activity tiers and table 8
ACH Management Plan Template 10
Determining “substantially commenced” 11
State significance guidelines 11
YMAC contacts.. 12
General YMAC contact information 12

Executive summary

1. Yamatji Marlpa Aboriginal Corporation (YMAC) is the Native Title Representative Body (NTRB), delivering native title and other services across the Pilbara, Mid West, Murchison and Gascoyne regions of Western Australia. YMAC is run by a First Nations board of directors, representing several native title groups, each of whom have their own language, culture, traditions and protocols. YMAC services include native title claim and future act representation; heritage services; executive office, community, and economic development assistance; land administration, and natural resource management support.

2. YMAC has previously made detailed submissions on 27 May 2022 and 19 August 2022, setting out our concerns and recommendations regarding Phases 1 and 2 of the consultation on the *Aboriginal Cultural Heritage Act 2021* (ACH Act) Regulations and Guidelines (and the principles that should guide them). This submission will not repeat those matters but sets out additional specific comments on each of the ACH Act Co-Design Phase 3 documents. These additional submissions should be read with our earlier detailed submissions.

3. There are some improvements in the guidelines. Due to the shortness of time in the consultation process, this submission only addresses the key points of concern noted by YMAC. There may be other points of concern from the groups we work for, but we have not been able to consult with all of these groups in the very limited time available.

Knowledge Holder Guidelines

4. We have concerns about point 3.2, on page 4, in relation to allowing electronic advertising on the department website, in circumstances when there may be more than five Knowledge Holders. It is not uncommon for there to be more than five Knowledge Holders. The danger is that merely advertising this on the department website will not be a means of actually notifying them – Knowledge Holders may not be able to read or have any system of keeping track of website notifications.

5. We urge that all known Knowledge Holders identified in the steps outlined in 4.1 need to be contacted directly, even if there is a numerous amount. There should also be additional notifications on websites and direct notices sent to the relevant Native Title Representative Bodies (NTRBs) and Native Title Service Providers (NTSPs), in case there are any more unidentified Knowledge Holders.

6. We previously submitted that there needs to be a process of notifying Local Aboriginal Cultural Heritage Services (LACHS), native title parties and NTRBs/NTSPs when a person seeks to be registered as a Knowledge Holder. There also needs to be mechanisms for dealing with disputes about such registrations. We note that reference to registering as a Knowledge Holder is no longer in these guidelines. Nevertheless, there is a reference to searching the directory for Knowledge Holders (see page 4, point 4.1) – but nothing about whether people can seek to be recorded on the directory as Knowledge Holders and what the process for this may be.

   We submit this could be contentious and, therefore, there needs to be a process outlined whereby there can be input from LACHS, native title parties and NTRBs/NTSPs about any recording of Knowledge Holders, even if just to note there is some contention about the registration.

7. We support the warnings in point 4.1 about survey reports being potentially unreliable.

Prescribed timeframes

8. We have previously advised why the time periods overall are far too short to enable LACHS to respond – and it is even worse for native title parties or Knowledge Holders who have even less infrastructure set up to respond to these notices. We noted how the timeframes are much shorter than those provided for in the *Native Title Act 1993* (Cth) (NTA), which are already too tight. While there has been a slight increase in some of the timeframes, they remain far too short and will not work for any bodies that cannot afford full-time employees engaged in responding within such timeframes.

9. We note it would be useful if the start of the time periods for responding to permit applications were explicitly stated to run from when *complete* notices are received by the relevant body or person, especially when notices are posted to remote areas or last known addresses of Knowledge Holders.

10. We also reiterate the dangers of having no mechanism to "stop the clock" in the permit application in relation to cases not addressed in the prescribed timelines, such as cultural business, sorry business, weather conditions, etc. We maintain "stop the clock" provisions can be built within the timeframes to be prescribed but, if not, the ACH Act needs to be amended.

Draft Consultation Guidelines

11. As discussed in our previous submissions, if proper consultation is to occur (covering all aspects), it will be necessary for proponents to provide funding for reasonable costs of consultation on Country, including travel allowances and payment for the consultation time of the relevant group and their consultants and staff. This needs to be explicitly stated.

12. The statements in the Principles of Successful Consultation, and on page 7, about "early and ongoing culturally appropriate consultation" are good. It would be better if it was stated these principles could be taken into account when assessing whether proper consultation has taken place.

13. We reiterate that many of the matters in the consultation guidelines are sensible and necessary – but they highlight the impracticability of expecting them to be carried out in the timeframes given. If they cannot be carried out in the short timeframes given, it is far less likely genuine consultation and informed consent will occur. See our comments on the timeframes above.

14. We do not support the inclusion of contacting or consulting someone via social media, as outlined in Guideline 4.1 on page 5 and elsewhere, unless the person to be consulted has specifically requested this.

15. Page 6 refers to cultural conventions and commitments that may impact the availability of First Nations people, which should always be considered and allowed for. However, catering for these cultural conventions and commitments is not listed as a mandatory requirement, when it clearly should be.

16. There is reference on page 7 to consultation requiring the use of interpreters, translated material, etc. It would be better if there was an explicit reference to these services having to be funded by the proponents.

17. In relation to item 4.4, on page 10, the draft guidelines speak of not having to disclose commercially or otherwise confidential information, although the proponent is to use alternative ways of providing that information. This is of concern because it may well defeat the requirement to disclose all feasible alternatives. To understand and accept what are feasible alternatives and what are not, Traditional Owners must be entitled to have these assessed and to understand the costs and profitability of the various alternatives. This can be done by way of confidentiality agreements or limiting the people who have access to the information – but not by refusing to provide the detail altogether.

18. The guidelines should not contradict the requirements of the ACH Act. As previously submitted, it should be made clear in the regulations that something should not be considered unfeasible simply because it may cost more, take more time or result in lesser profit. Otherwise, proponents could argue the only feasible options are those that maximise time and profitability, thereby defeating the purpose of the requirements in s146 of the ACH Act. What is feasible must be determined objectively, not simply in the view of the proponent. Proponents should also provide reasonable funding for First Nations groups to obtain expert advice on the options available and the relative feasibilities of these to redress the imbalance of power and knowledge of such technical matters.

19. As ACH management plans require processes to be followed if the parties become aware of new information, there should be guidelines to also address the need for ongoing consultation requirements.

Local ACH Service (Fees) Guidelines

20. We note that, in the guidelines as currently drafted, the functions for which charges can be made have been expanded to cover functions under s48 and the rates are based on hourly rates rather than set amounts for deliverables.

21. We are most concerned, however, that in the consultation, it was said the intent is to still exclude fees for s48 services carried out in relation to ACH permit applications. This is clearly contrary to s49 of the ACH Act that says in s49(1): "…a person designated as a local ACH service may charge a fee for services that it provides in connection with any local ACH service functions that it provides in relation to the area for which it is designated". The only exception is that a fee may not be charged for services provided to the department or ACH Council. It is contrary to the ACH Act to place a limit on services provided that otherwise come within s48 and which may legitimately be charged under the ACH Act, including s48 functions relating to ACH permit applications. Guidelines that do not reflect the ACH Act are likely to attract legal challenges. We therefore urge for the guidelines not to be changed to exclude services relating to s48 functions just because those functions relate to ACH permit applications.

22. We still would prefer it if the fee-for-service guidelines made it absolutely clear that fees can be required to be paid before the services are provided. Most LACHS will not be in a position to afford or take the risk of incurring costs that may not be recovered. It is essential they are able to ask for fees in advance. We assume this is still open under the guidelines but it would avoid arguments if made explicit.

23. The rates for LACHS Heritage Officers (LHOs), LACHS Senior Heritage Officers (LSHOs) and heritage professionals in the schedule of rates are too low. We suggest the maximum rates need to be increased to cover 2022 rates, becoming higher in 2023 when the regulations come into effect. We suggest they be increased to at least $200 per hour and $2000 a day.

Protected Area Order Guidelines

24. We note that Item 4.1 on page 4 still speaks of the factors listed below as matters Knowledge Holders should address. As submitted previously, this may give the wrong impression that every single factor needs to be addressed for an area to be considered of outstanding significance. It would be better to state Knowledge Holders should address all factors *they* rely on for saying an area is of outstanding significance and that *some* examples of factors that may be relevant are outlined within the guidelines.

25. A point of guidance should be added to make it clear an area of Aboriginal Cultural Heritage that may have been damaged or affected in the past does not mean it is no longer of outstanding significance or should not be declared as a protected area.

26. It is appropriately acknowledged that culturally sensitive information need not be provided. There is a danger that highly significant areas may be subject to many cultural restrictions on disclosure. There should be a point of guidance that, if there is a lack of detail due to cultural sensitivity, this should *not* be considered a factor against finding an area is of outstanding significance.

ACH Management Code

27. Our first comment notes this code is difficult to work through and may be contradictory at points. For example, the five steps for a Due Diligence Assessment (DDA) are listed on page 8 at point 6. This follows from point 5.1 about the aims of a DDA. What follows is that each of these steps must be undertaken for a valid DDA, regardless of whether the activity is Tier 1, 2 or 3. However, when it comes to page 10 for a Tier 1 activity, there is no reference to DDA 4. This problem also exists in the flowchart 3 at page 29.

28. In addition, when it comes to ascertaining whether there is ACH that may be damaged, table 9 on pages 23 and 24 makes it clear the steps outlined on page 10 will not be sufficient to confirm there is no ACH if there is nothing in the directory. There is a reference in the first sentence of point 9, which states that engagement with a First Nations party may be necessary when it is not clear whether ACH is at risk of being harmed. However, it would make more sense for this point to be included in the steps outlined on page 10 for Tier 1 activities, rather than expecting people to scroll from page 10 or flowchart 3 down to page 20 to find the next step.

29. This is particularly important because, for Tier 1 activities, there is a requirement in s102 (c) and (d) of the Act to ascertain whether ACH is located in the area and whether there is a risk of harm. There is also a requirement in s110 to take all reasonable steps possible to avoid or minimise the risk of harm. It should be made clear that, to comply with s102 and s110, the steps outlined on page 10 for Tier 1 activities are not sufficient – page 10 and flowchart 3 on page 29 should instead list *all* the steps required for a Tier 1 DDA.

30. The same applies to the preliminary DDA steps required for Tier 2 and 3 activities as well.

31. We have major concerns about the newly proposed exempt activities to be listed in the regulations, which were not previously disclosed in the list of activities in the ACH Act itself. We will address these concerns below when referring to the Activity Tiers.

32. We cannot comment on the references to Survey Guidelines on pages 11 and 13, as we have not seen the content of such guidelines. As a point of concern, we note it is rarely likely that previous surveys can be considered conclusive in relation to the lack of ACH in an area. Such surveys are usually limited to specific narrow work areas and particular types of activities or are broad regional studies with limited relevance to the specific area. Many surveys may not be carried out with all the right people or by a proper methodology. These risks and the fact step 4 on pages 12 and 14 will rarely be the case should be made very clear in the code. These warnings should also be included in the table on page 24 and flowcharts from pages 29 to 31. The Survey Guidelines, when drafted, should make it clear there needs to be an assessment of whether further surveys are required.

33. The assessment of surveys for Tier 2 activities under the DDA requires clarification. It suggests the assessment be undertaken to gauge whether the reports are sufficient to provide site information, rather than assessing whether all relevant land has been surveyed and/or surveyed to an acceptable level.

34. The DDA for Tier 2 activities suggests activities within ACH is acceptable with a permit, rather than stipulating the requirement to avoid ACH as a result of the DDA and any information gained from notifying Knowledge Holders.

35. Ground disturbance is not defined in the ACH Act but should include any form of disturbance of the ground and waterways. Ground disturbance should also include disturbances such as dust and vibrations. On page 16, at point 7.2, the examples of disturbance should include lower impact ground disturbance, such as walking or driving on the area, to illustrate these are potential types of disturbance.

36. Our concerns with new or additional ground disturbance and like-for-like disturbance will be addressed when discussing exempt activities in the activity tiers below.

37. Appendix 3 should make it clear that carrying out a social surroundings analysis at the same time as heritage assessments should only be able take place with the agreement of the LACHs and relevant Traditional Owners.

38. The management plan template should include provision for this, to demonstrate there has been a coherent social surroundings consultation process including the provision of all relevant environmental information.

39. There are references through the code to “dithered boundaries”. However, it cannot be assumed that such a boundary is not also part of the First Nations place. A First Nations place is not necessarily a physical feature only as there may be spheres of influence or power around a particular feature, meaning the wider buffer area itself forms part of the ACH – and intrusion into such a buffer area could be damaging to ACH.

40. On page 18, at point 2.4, there is undue emphasis on physical ground disturbance, when ACH can be damaged by non-physical activities or effects. A failure to consider this in a DDA is inappropriate and can mislead people into committing offences. In addition, while there is a good discussion about how past disturbance does not mean new disturbance will not be damaging, it can be confusing as to what amounts to new or additional disturbance. It should be made clear that a repeat of the same type of

disturbance in the same footprint is nevertheless a new or additional disturbance. In other words, any new activity could amount to damage.

41. Visual inspection should be defined so it is conducted with some level of expertise and intent to preserve ACH.

Activity tiers and table

42. As previously noted, YMAC's view has consistently been that only First Nations people to whom ACH belongs can determine the level of impact. We note the designation of tiers is based on physical levels of disturbance and may bear no relation to the level of adverse impacts to the sacredness or significance of the heritage belonging to a First Nations group. It is important that activity categories still recognise the potential impacts on heritage values. This is a general comment, relevant to how activity tiers are described. We have previously commented on the proposed activity tiers and reiterate these.

43. As mentioned above, we are particularly concerned about the proposed addition of exempt activities, which were not listed in the list of disclosed exempt activities in s100 of the Act, some of which are discussed below.

44. Burials in existing cemeteries on page 7. Cemetery services were originally in Tier 1, which is an appropriate place. We previously submitted that such services needed to be restricted to existing cemeteries. Such cemeteries may be very large and may cover First Nations places that are currently undisturbed. These should, at the very least, require a DDA analysis to minimise harm and be left undisturbed if in culturally sensitive areas.

45. On page 12, there is a range of activities that were listed as Tier 1 activities, not exempt. We objected to some of these being listed as Tier 1 activities and have even greater objections if they are exempt and do not require, at the very least, a DDA. Some examples are:

    - Temporary camps, which could even include trailers and caravans. These could be in important First Nations places, rather than established caravan parks. We previously argued these should be Tier 3 activities.
    - Low-intensity exploration activities involving sampling, coring and fossicking.
    - General maintenance and lifestyle activities on modified landforms and Maintenance of existing infrastructure with no new or additional ground disturbance. These were previously listed as Tier 1 activities. We were concerned they were too widely stated and submitted they needed to be narrowed. The proposed exemptions do not limit the type of activity to low-impact ones. The existing infrastructure or modified landforms could be on a significant First Nations place and repeating any damaging activity could be further damaging to the area. At the very least, there should be a requirement for a DDA process to avoid or minimise further damage, rather than to be completely exempt.
    - Aerial transport that does not require clearing at landing. These were previously listed as Tier 1 activities. We urged consultation with LACHS and Traditional Owners prior to flying over areas. Landing a large object such as a plane could be highly damaging and ground-disturbing and should be a Tier 3 activity.
    - Undertaking a "like-for-like" activity or less is arguably wider than many of the activities previously listed as Tier 1 and 2 activities. If the original activity caused damage to a First Nations place, exempting like-for-like activity is only authorising

more and continuing damage. There is nothing to exclude such ongoing damage of sites and other First Nations places from the definition of exempt activities. Such damage is currently an offence and would be a continuing offence under the *Aboriginal Heritage Act 1972* and, if not exempt, under the ACH Act. This needs to be removed from the exempt activities category.

46. There is a list of non-emergency activities on page 5 that are listed as Tier 1 activities. Some of these were previously in the Tier 2 list – which is where they should be, if the actual activity is low impact – but if the activity is medium to high impact, then it should be in Tier 3. They should not all be listed as Tier 1 activities. This would be consistent with the ACH Act.

47. One possible compromise is to exclude any activities within areas of Aboriginal Cultural Heritage indicated on the ACH Directory from the exempt and Tier 1 categories, as such areas need additional caution and consultation even if the activities do not cause major physical ground disturbance. While this still leaves unregistered areas at risk (so therefore it is not our preferred position), it would be better than allowing complete damage within areas of recorded cultural heritage by making them exempt or only through unilateral consideration and decision-making by proponents.

48. We submit the "catch-all" provisions in Tiers 1 and 2 are dangerous and could be activities that are very damaging to cultural heritage. These should be removed, as there are no clear parameters placed on those forms of ground disturbance and there is much room for dispute. Tier 3 should be in effect the "catch-all" tier.

49. The following Tier 2 activities should be moved to Tier 3, due to the fact they are not low impact and potentially highly damaging:
    - Agricultural activities using handheld mechanical equipment
    - Field mapping involving digging of pits
    - Temporary burial of survey equipment
    - Removal of material up to 20kg
    - Soil and drainage sampling using handheld equipment – *requires limits*
    - Air drilling
    - Installation of equipment that requires new footings on land or in water
    - Installation of permanent structures that do not require foundations – *these still may impede access to or obscure a site/s*
    - Low-level ground disturbance with non-handheld mechanical equipment
    - Ground square excavation with the surface area up to and including 0.25m²
    - Ground excavation with a depth up to and including 0.5m
    - Clearing up to and including 100m²
    - Agricultural activities using handheld mechanical equipment – *all activities listed could potentially cause irreversible harm to cultural characteristics*
    - Research – excavation of ACH using handheld equipment, sampling and repatriation – *should all be in collaboration with heritage custodians under an agreed research plan*.

50. The following Tier 1 activities should be moved to Tier 3, due to the fact they are not low impact and potentially highly damaging:
    - Water abstraction with no ground disturbance
    - Placement of pipeline or cable on the surface without anchoring into the seabed.

51. The following Tier 1 activities should be moved to Tier 2, due to the fact they are not low impact and potentially damaging:

- Discharge of comparable quality water into existing waterways and waterbodies – *this is not always acceptable as some waterbodies have a variable hydrological cycle and require periods of senescence*
- Removal of sea flora that does not require seabed disturbance – *should be the same as other vegetation removal*
- Vegetation control via mechanical slashing, mulching or spraying *in Tier 1 and* weed control using non-handheld mechanical equipment *in Tier 2* are contradictory
- Digital capture of petroglyphs, artefacts and rock art – *requires notification at the very least; should require permission from heritage custodians*
- Drone use – photographs and/or capture of footage within ACH for public reproduction should require permission
- Removal of material up to and including 4kg
- Ground excavation with a surface area smaller than 0.04m
- Driving vehicles, not on existing roads or tracks.

52. We reiterate our previous submissions in relation to the activity list attached.

53. We note that during the phase 3 co-design workshop on 1 December 2022, DPLH stated the ACH deals with ground disturbance only and that impacts to water – and impacts as a result of light or noise – would not be contemplated. This is a concern as:
    - significant cultural values and characteristics are held in water and there could be impact to those values, regardless of whether there is any associated ground disturbance. Pollution and extraction are two examples of potential impact, independent of ground disturbance.
    - Light and noise can have an impact on species of fauna and hence on sacred narratives based on the maintenance and enjoyment of these populations.
    - Light and noise can have an impact on the social enjoyment and economic use of the area, which are two considerations under the *Environmental Protection Act 1986* (EPA). It appears that factors considered under the EPA will **NOT** be dealt with under the ACH Act.

ACH Management Plan Template

54. As previously submitted, in relation to new information on page 9 at point 3.7, the regulations and guidelines should provide minimum requirements for processes to ascertain new information rather than leaving it to the parties to reach an agreement, in circumstances where there is usually uneven bargaining power in favour of proponents. If there are minimum requirements for ongoing consultation and review and confirmation the First Nations parties themselves may unilaterally report new information to the ACH Council, this would be preferable.

55. 3.3 Part C – Consultation asks that the "…views of any other persons consulted on the contents of the Plan, including any alternate views". This should be clarified to demonstrate which other persons would be consulted and whether their views would be given weight.

56. Overall, the structure of the plan is good but there could be more examples of impacts and avoidance.

57. How will social surrounds considerations be incorporated into these plans? There should be at least another section to include further details where a social surrounds analysis was undertaken.

Determining "substantially commenced"

58. In relation to point 4.2 on page 4, where ground disturbance as covered by a section 18 consent has not commenced – this cannot be regarded as substantial commencement of the work in the section 18 consent, even if it is part of a larger project area. The fact a larger project has commenced does not mean the "purpose for which *the land the subject of the consent* may be used, *as specified in the consent*, has been substantially commenced" as required by s325(3) of the ACH Act. The guidelines cannot validly expand the scope of the ACH Act.

State significance guidelines

59. The removal of some of the non-Indigenous terminology from the Phase 2 draft is supported – but we are still concerned the reference is only to the significance to the broader WA community. Social value, for example, refers to value to a particular community, which could be a First Nations community, and need not require value to the wider WA community.

60. As previously submitted, it would be helpful if the categories of cultural significance specifically included First Nations significance as part of State significance.

YMAC contacts

Simon Hawkins – Chief Executive Officer

Phone: (08) 9268 7000

Email: dlamb@ymac.org.au

Jane Mitchell – Communications Manager

Phone: (08) 9268 7000 or 0427 463 796

Email: jmitchell@ymac.org.au

General YMAC contact information

Please find contact information for YMAC's offices below.

Perth
Level 8, 12 The Esplanade, Perth WA 6000
PO Box 3072, 249 Hay Street, Perth WA 6892
T \ (08) 9268 7000 F \ (08) 9225 4633

Geraldton
171 Marine Terrace, Geraldton, WA 6530
PO Box 2119, Geraldton WA 6531
T \ (08) 9965 6222 F \ (08) 9964 5646

Hedland
8 Manganese Street, Wedgefield WA 6721
PO Box 2252, South Hedland WA 6722
T \ (08) 9160 3800 F \ (08) 9225 4622

Carnarvon
4 Francis Street, Carnarvon WA 6071
PO Box 1424, Carnarvon WA 6071
T \ (08) 9965 6222 F \ (08) 9964 5646

Broome
Shop 2/24 Clementson Street, Broome WA 6725
PO Box 2059, Broome WA 6725
T \ 1800 270 709