

Peet Mandurah Syndicate Limited
Lakelands East Residential Development, Mandurah,
WA (EPBC 2013/7048)
Annual Compliance Report 2022

2 May 2022

63014/143,635 (Rev 0)

JBS&G Australia Pty Ltd T/A Strategen-JBS&G

Table of Contents

1.	Introduction	1
1.1	Project Background	1
1.2	Environmental Approval to Implement the Project	1
2.	Current Status	2
3.	Audit Methodology	3
3.1	Purpose and Scope	3
3.2	Audit Period	3
3.3	Methodology	3
3.4	Audit Terminology	3
4.	Audit Results	4
4.1	Compliance with EPBC 2013/7048	4
4.2	Conformance with the Revegetation Management Plan	4
5.	Limitations	8
6.	References	9

List of Tables

Table 3.1:	Persons consulted during the audit	3
Table 3.2:	Action implementation status	3
Table 4.1:	Compliance with conditions of EPBC 2013/7048	5

Appendices

- Appendix A EPBC Approval 2013/7048 and Variation to Approval Conditions
- Appendix B Audit of Implementation of the Revegetation Management Plan

1. Introduction

This report addresses the status and compliance of implementation of the 'Lakelands East' Residential Development with the conditions in the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) approval 2013/7048 (EPBC 2013/7048; Appendix A). This report has been prepared for the purpose of meeting the requirements of condition 8 of EPBC 2013/7048, which requires the proponent to publish annual compliance reports.

1.1 Project Background

Peet Mandurah Syndicate Limited (Peet) is developing the 'Lakelands East' residential development (Lakelands) located approximately 65 km south of Perth Central District, Western Australia,

The project involves the development of approximately 500 residential lots, Public Open Space (POS) and a primary school on Lot 9099 Mandjoogoordap Drive, Mandurah.

The project commenced on 2 February 2015.

1.2 Environmental Approval to Implement the Project

The project was referred to the then Department of the Environment (DotE) (now called the Department of Agriculture, Water and the Environment [DAWE]) for assessment under the EPBC Act in 2013. The development of Lakelands was determined a Controlled Action on 29 November 2013 due to the potential for significant impacts on listed threatened species and communities (sections 18 and 18A). The project was assessed on Preliminary Documentation and approved with conditions on the 3 December 2014 (EPBC 2013/7048; Appendix A).

A request to vary condition 11 of EPBC 2013/7048 was submitted on 22 January 2016, with the request approved on 9 May 2016 (Appendix A). The variation deleted the original conditions 11 and 13 and replaced them with new conditions 11 and 13, respectively regarding revisions to, and publication of, the Revegetation Management Plan (RMP) prepared and approved under condition 3.

2. Current Status

Activities undertaken during the audit period (3 February 2021 to 2 February 2022) included:

- Clearing of individual tree at Stage 78 in March 2021
- Construction of Stage 78
- Weed spraying in the revegetation area in June/July 2021, August 2021 and February 2022
- Weed spraying in the landscaping area fortnightly
- Infill planting was undertaken in the revegetation area in July 2021. No Infill planting was undertaken in the landscaping areas during the audit period.
- Annual monitoring of revegetation areas undertaken in October 2021.

3. Audit Methodology

3.1 Purpose and Scope

This report has been prepared for Peet (the approval holder) to fulfil the requirements of Condition 8 of EPBC 2013/7048 which states that:

Within three months of every 12-month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of the RMP, over the previous 12 months, as specified in the conditions. Documentary evidence providing proof of the date of publication must be provided to the Department at the same time as the compliance report is published. The compliance reports must remain on the website for the life of the approval. All contraventions must also be included in the compliance reports. Unless otherwise agreed in writing by the Minister, the approval holder must provide a copy of each compliance report to members of the public upon request. Copies must be provided free of charge as soon as reasonably practicable but within no longer than 7 days of the request.'

3.2 Audit Period

This Annual Compliance Report (ACR) addresses the audit period between 2 February 2021 and 3 February 2022 for the conditions of EPBC 2013/7048 and implementation of the Revegetation Management Plan (RMP) (Revision 8, Strategen 2020) required by conditions 3 and 4 of EPBC 2013/7048.

3.3 Methodology

The audit was undertaken during April and May 2022, with a site inspection carried out by Certified Environmental Auditors Andrew Winzer and Andrea Wills from Strategen-JBS&G on 27 April 2022. Table 3.1 provides an overview of the personnel consulted as part of the audit. A review of documentation was also undertaken to support the audit.

Table 3.1: Persons consulted during the audit

Person and position	Organisation	Purpose
Sheridan Hunter, Development Manager	Peet	To obtain verifiable evidence to assist in determining compliance with EPBC 2013/7048
Damian Grose, General Manager	Tranen Revegetation Systems	To obtain verifiable evidence to assist in determining compliance with EPBC 2013/7048
Matthew Field, Manager Environmental Services	Workpower	To obtain verifiable evidence to assist in determining compliance with EPBC 2013/7048

3.4 Audit Terminology

The 'Status' field of the audit tables (refer to Table 4.1) describes the implementation of actions and compliance with the approval. DAWE (DotE 2014) has published Annual Compliance Report Guidelines and terminology from this guidance was applied in this audit (Table 3.2).

Table 3.2: Action implementation status

Status	Acronym	Description
Compliant	C	'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Potentially non-compliant	PNC	A designation of 'potentially non-compliant' should be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not Applicable	N/A	The requirements of a condition or elements of a condition/management action fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced or has been completed previously.

Source: DotE (2014)

4. Audit Results

The results of the audit of EPBC 2013/7048 are shown in Table 4.1. The results of the audit of conformance with the management actions contained within the RMP are outlined in Appendix B.

A total of 88 items were audited from EPBC 2013/7048 and RMP.

4.1 Compliance with EPBC 2013/7048

Of 28 sub-conditions of EPBC 2013/7048:

- 16 were found to be compliant
- None were found to be non-compliant
- 12 were found to be not applicable

The results of the audit of EPBC 2017/8062 are shown in Table 4.1. Of 28 sub-conditions of EPBC 2017/8062.:

Opportunities for improvement to avoid future potentially non-compliances are:

- Record keeping for weed control records is improved
- The Revegetation Management Plan is amended to increase flexibility regarding seed collection (this was a recommendation of the 2021 audit).

There are old tree guards requiring removal from the western side of the lake. It is recommended that the old tree guards are removed and disposed of.

4.2 Conformance with the Revegetation Management Plan

Of the 60 key actions identified from the RMP:

- 49 were found to be 'Conformant', of which one was identified as 'Conformant (completed)',
- 6 were found to be 'Not applicable',
- 5 were found to be 'Potentially non-Conformant'.

The five actions found to be potentially non-conformant were:

- RMP 3 regarding no greater than >10% weed cover in quadrats 1, 2 and 7.
- RMP 26, 30, 50 and 60 relating to follow up weed control, seedling collection, contingency measures and roles and responsibilities.

The auditors determined these potential non-conformances are minor and have either minimal or no environmental impact.

Although the above were non-conformant with actions from the RMP, the objective of this plan; to successfully revegetate the Black Swan Lake area has been achieved. Images taken during the most recent site inspection confirm the 2020 infill planting site is flourishing.

Table 4.1: Compliance with conditions of EPBC 2013/7048

Condition Number	Condition	Evidence	Comments	Compliance status
EPBC 1.1	The approval holder must not clear any black cockatoo habitat trees outside of the project area.	Management advice on 27/04/2022 E009_Peet Lakelands ACR evidence	Management confirmed that the only clearing in the audit period was the individual tree in Stage 78 confirming that the approval holder did not clear any black cockatoo habitat trees outside the project area.	C
EPBC 2.1	The approval holder must retain no less than three hundred and three (303) black cockatoo habitat trees, including no less than one hundred and twenty (120) potential breeding trees and no less than one hundred and eighty-three (183) foraging species within the project area.	C10_2021 Lakelands tree survey results	The Lakelands significant tree survey data as at 23 April 2021 showed that 431 trees have been identified for retention, with 431 identified as foraging species and 159 of those identified as potential breeding trees. Therefore, the number of trees retained meets the required criteria.	C
EPBC 3.1	To compensate for the loss of black cockatoo habitat trees, within one month of the date of the approval, the approval holder must prepare and submit a Revegetation Management Plan (RMP) for the Ministers approval to revegetate within the offset site.	R16_Lakelands Revegetation Management Plan (Rev 8) R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019	This condition has previously been assessed as compliant. The current revised version (Rev 6) of the RMP was submitted to the DEE on 22 September 2017 and approved on 10 October 2017.	N/A
EPBC 3.2	The approval holder must not commence the action unless the Minister has approved the RMP.	R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019	This obligation has been previously assessed as Compliant (R_010).	N/A
EPBC 3.3	The RMP must include, but may not be limited to: a. Objectives of the RMP; b. Location, condition, size and suitability of the revegetation areas within the offset site; c. Detailed information on each stage of the revegetation project; d. Black cockatoo tree and shrub species to be utilised, source of plant stock, stocking rates (at least six thousand two hundred (6200) tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species), planting method and schedule; e. Preventative management actions that will be implemented to manage weeds, feral animals and anthropogenic activities, within the offset site prior to, during and post planting; f. Revegetation success criteria (that 3 years from the date of planting the approval holder must achieve a minimum of 80 percent survival rate of the planted potential breeding species and 80 percent survival rate of the planted foraging species), and detailed response measures and corrective actions should success criteria not be met; g. Monitoring program, including the type, timing and frequency of monitoring; h. Responsibilities for planning, implementing, management, reporting and monitoring the RMP; i. Timeframes for the implementation of each stage of the RMP; j. Details on the conservation mechanism to protect and conserve the offset site.	E008_Lakelands Revegetation Management Plan (Rev 8)	The approved RMP Rev 8 includes the required details: a. Objectives of the RMP (Section 3.1) b. Location, condition, size and suitability of the revegetation areas within the offset site (Section 1.2) c. Detailed information on each stage of the revegetation project (Section 4) d. Black cockatoo tree and shrub species to be utilised, source of plant stock, stocking rates (at least six thousand two hundred (6200) tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species), planting method and schedule (Sections 3.2, 4.3 and 4.6) e. Preventative management actions that will be implemented to manage weeds, feral animals and anthropogenic activities, within the offset site prior to, during and post planting (Section 4) f. Revegetation success criteria (that 3 years from the date of planting the approval holder must achieve a minimum of 80 percent survival rate of the planted potential breeding species and 80 percent survival rate of the planted foraging species), and detailed response measures and corrective actions should success criteria not be met (Section 3.2 and 6) g. Monitoring program, including the type, timing and frequency of monitoring (Section 5) h. Responsibilities for planning, implementing, management, reporting and monitoring the RMP (Section 4 and 7) i. Timeframes for the implementation of each stage of the RMP (Section 4.6) j. Details on the conservation mechanism to protect and conserve the offset site (Section 4.7)	C
EPBC 4.1	If the Minister approves the RMP, then the approval holder must implement the approved RMP.	Refer to Appendix B	The RMP has been implemented across the Project during the period. Refer to Appendix B for further information. Of 60 key actions identified from the RMP: • seven were found to be 'Non-compliant' • 42 were found to be 'Compliant' • 11 were found to be 'Not applicable'	C
EPBC 5.1	To avoid and mitigate impacts to black cockatoos, if clearing is to be undertaken during the breeding season (July - November), within 7 days prior to clearing, the approval holder must ensure all potential nesting trees within the project area are investigated to detect the presence of black cockatoos using hollows. The investigation must be undertaken by a suitably qualified and experienced person. If any black cockatoos are detected using a hollow in a tree or trees, the approval holder must: i. Clearly identify all such trees with fencing and signage that must be located within two (2) metres of the base of each such tree; ii. not clear any such tree of any vegetation within 10 metres of any such tree; and	E007_Lakelands stage 78 tree inspection invoice Management advice on 27/04/2022 E009_Peet Lakelands ACR evidence	No clearing was completed between July and November 2022. The clearing of the individual Tuart Tree prior to removal (28/02/2021) occurred outside the Black Cockatoo breeding season, however fauna specialists were still engaged to undertake tree inspections.	C

Condition Number	Condition	Evidence	Comments	Compliance status
	iii. undertake all reasonable measures to avoid any such tree from being cut down, felled, removed, killed, destroyed, poisoned, ring-barked, uprooted or burned until a suitably qualified and experienced person has verified in writing that the hollow/s in each such tree are no longer used by black cockatoos.			
EPBC 6.1	Within 30 days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.	Strategen March 2016 ACR PEE13082_01 R008 Rev 0	The action commenced 02/02/2015 and the Department was advised 13/02/2015.	N/A
EPBC 7.1	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the RMP, required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the Environment Protection and Biodiversity Conservation Act 1999, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	Management Advice 27/04/2022 Refer to Appendix B	Peet provided the auditors with records substantiating all activities associated with or relevant to the conditions of approval for all applicable conditions and requirements in the RMP. There was no request received from the Department during the audit period	C
EPBC 8.1	Within three months of every 12-month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of the RMP, over the previous 12 months, as specified in the conditions.	E001_Peet Website View ACR E006_Notice of EPBC Act Approval 2021 Annual Compliance Report	The ACR was prepared and published on Peet's website on 03 May 2021, which is within three months of the 12-month anniversary of commencement (3 February).	C
EPBC 8.2	Documentary evidence providing proof of the date of publication must be provided to the Department at the same time as the compliance report is published.	E006_Notice of EPBC Act Approval 2021 Annual Compliance Report R01_Lakelands East ACR 2021	Documentary evidence detailing the date of publication of the 2021 ACR on Peet's website was provided to DAWE on 03/05/2021.	C
EPBC 8.3	The compliance reports must remain on the website for the life of the approval.	E001_Peet Website View ACR	Lakelands ACRs 2016, 2017, 2018, 2019, 2020 and 2021 are all available on the www.peet.com.au website during the reporting period	C
EPBC 8.4	All contraventions must also be included in the compliance reports.	E006_Notice of EPBC Act Approval 2021 Annual Compliance Report R01_Lakelands East ACR 2021	Contraventions have been included within the compliance reports published on the Peet website. In the 2016 to 2017 ACR, no potential non-compliances with conditions of EPBC 2013/7048 were identified; and two potential non-conformances with the RMP requirements were reported. In the 2017 to 2018 ACR, one potential non-compliance with conditions of EPBC 2013/7048 was identified; and eight potential non-conformances with the RMP requirements were reported. In the 2018 to 2019 ACR, no potential non-compliances with conditions of EPBC 2013/7048 were identified; and six potential non-conformances with the RMP requirements were reported. In the 2019 to 2020 ACR, no potential non-compliances with conditions of EPBC 2013/7048 were identified; 5 minor non compliances with the RMP requirements were reported In the 2020 to 2021 ACR no potential non-compliances with conditions of EPBC 2013/7048 were identified; 8 non-compliances with the RMP requirements were reported	C
EPBC 8.5	Unless otherwise agreed to in writing by the Minister, the approval holder must provide a copy of each compliance report to members of the public upon request. Copies must be provided free of charge as soon as reasonably practicable but within no longer than 7 days of the request.	Management advice on 27/04/2022	Management advised that there were no requests from the public for copies of the compliance reports during the audit period. All compliance reports are available at: https://www.peet.com.au/communities/perth-and-wa/lakelands-estate/purchaser_builder-information/environmental-sustainability	C
EPBC 9.1	Potential or actual contraventions of the conditions of the approval must be reported to the Department in writing within 2 business days of the approval holder becoming aware of the actual or potential contravention.	Management advice on 29/04/2022	Management advised that there were no potential or actual contraventions of the EPBC approval conditions during the audit period.	C
EPBC 10.1	Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister.	Management advice on 27/04/2022	Management advised that they had not received any such direction from the Minister to conduct an independent audit during the audit period.	C
EPBC 10.2	The independent auditor must be approved by the Minister prior to the commencement of the audit.	Refer to EPBC 10.1	Refer to EPBC 10.1	N/A

Condition Number	Condition	Evidence	Comments	Compliance status
EPBC 10.3	Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	Refer to EPBC 10.1	Refer to EPBC 10.1	N/A
EPBC 11.1	The approval holder may choose to revise the RMP approved by the Minister under condition 3 without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised RMP would not be likely to have a new or increased impact.	Management Advice 27/04/2022	No revisions to the Revegetation Management Plan occurred during the audit period	C
EPBC 11.2	If the approval holder makes this choice it must: <ul style="list-style-type: none"> i. notify the Department in writing that the approved RMP has been revised and provide the Department with an electronic copy of the revised RMP; ii. implement the revised RMP from the date that the plan is submitted to the Department; and iii. for the life of this approval, maintain a record of the reasons the approval holder considers that taking the action in accordance with the revised RMP would not be likely to have a new or increased impact. 	Refer to EPBC 11.1	Refer to EPBC 11.1	N/A
EPBC 11.3	11A. The approval holder may revoke its choice under condition 11 at any time by notice to the Department. If the approval holder revokes the choice to implement the revised RMP, without approval under section 143A of the Act, the RMP approved by the Minister must be implemented.	Refer to EPBC 11.1	Refer to EPBC 11.1	N/A
EPBC 11.4	11B. Condition 11 does not apply if the revisions to the approved RMP include changes to matters listed under condition 3 j, unless otherwise agreed in writing by the Minister. This does not otherwise limit the circumstances in which the taking of the action in accordance with a revised RMP would, or would not, be likely to have new or increased impacts.	Refer to EPBC 11.1	Refer to EPBC 11.1	N/A
EPBC 11.5	11C. If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised RMP would be likely to have a new or increased impact, then: <ul style="list-style-type: none"> i. Condition 11 does not apply, or ceases to apply, in relation to the revised RMP; and ii. The approval holder must implement the RMP approved by the Minister. To avoid any doubt, this condition does not affect any operation of conditions 11, 11A and 11B in the period before the day the notice is given. At the time of giving the notice the Minister may also notify that for a specified period of time condition 11 does not apply for the RMP required under the approval.	Refer to EPBC 11.1	Refer to EPBC 11.1	N/A
EPBC 11.6	11D. Conditions 11, 11A, 11B and 11C are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised RMP to the Minister for approval.	Refer to EPBC 11.1	Refer to EPBC 11.1	N/A
EPBC 12.1	If the Minister believes that it is necessary or convenient for the better protection of listed threatened species and communities to do so, the Minister may request that the approval holder make specified revisions to the RMP specified in the conditions and submit the revised RMP for the Minister's written approval. The approval holder must comply with any such request.	Management Advice 27/04/2022	Management advised that no requests were received from the Minister during the audit period to revise the RMP.	C
EPBC 12.2	The revised approved RMP must be implemented. Unless the Minister has approved the revised RMP, then the approval holder must continue to implement the RMP previously approved, as specified in the conditions.	Refer to EPBC 12.1	Refer to EPBC 12.1	N/A
EPBC 13.1	Unless otherwise agreed to in writing by the Minister, the approval holder must publish the revised RMP on its website.	E002_Peet Website View RMP Rev 8	Revision 8 of the RMP (current) was accessed online by the auditors on 26/06/2022	C
EPBC 13.2	The revised RMP must be published on that website within 1 month of being approved or submitted under condition 11 i. and remain published for the life of the approval.	E002_Peet Website View RMP Rev8	See 13.1	N/A

5. Limitations

Scope of services

This report ("the report") has been prepared by Strategen-JBS&G in accordance with the scope of services set out in the contract, or as otherwise agreed, between the Client and Strategen-JBS&G. In some circumstances, a range of factors such as time, budget, access and/or site disturbance constraints may have limited the scope of services. This report is strictly limited to the matters stated in it and is not to be read as extending, by implication, to any other matter in connection with the matters addressed in it.

Reliance on data

In preparing the report, Strategen-JBS&G has relied upon data and other information provided by the Client and other individuals and organisations, most of which are referred to in the report ("the data"). Except as otherwise expressly stated in the report, Strategen-JBS&G has not verified the accuracy or completeness of the data. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the report ("conclusions") are based in whole or part on the data, those conclusions are contingent upon the accuracy and completeness of the data. Strategen-JBS&G has also not attempted to determine whether any material matter has been omitted from the data. Strategen-JBS&G will not be liable in relation to incorrect conclusions should any data, information or condition be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to Strategen-JBS&G. The making of any assumption does not imply that Strategen-JBS&G has made any enquiry to verify the correctness of that assumption.

The report is based on conditions encountered and information received at the time of preparation of this report or the time that site investigations were carried out. Strategen-JBS&G disclaims responsibility for any changes that may have occurred after this time. This report and any legal issues arising from it are governed by and construed in accordance with the law of Western Australia as at the date of this report.

Environmental conclusions

Within the limitations imposed by the scope of services, the preparation of this report has been undertaken and performed in a professional manner, in accordance with generally accepted environmental consulting practices. No other warranty, whether express or implied, is made.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

Strategen-JBS&G accepts no liability for use or interpretation by any person or body other than the client who commissioned the works. This report should not be reproduced without prior approval by the client, or amended in any way without prior approval by Strategen-JBS&G, and should not be relied upon by other parties, who should make their own enquiries.

6. References

Department of the Environment (DotE) 2014, *Annual Compliance Report Guidelines*, Commonwealth of Australia, Canberra.

Appendix A EPBC Approval 2013/7048 and Variation to Approval Conditions

Appendix B Audit of Implementation of the Revegetation Management Plan

Table B.1: Revegetation Management Plan Audit Table

Reference	Condition	Timing	Evidence	Comments	Conformance status
RMP 1	Section 3.1 Revegetation objectives and scope Revegetation will occur within two specified areas (revegetation areas and landscaping areas in the offset site) as displayed in Figure 1.	During revegetation	E005_Transen Black Swan Post Activity Report	Revegetation planting in revegetation area commenced in 2016 and landscape areas in July 2017. Revegetation planting was undertaken in the revegetation area on 07/07/2021 over an area of 0.27 ha with 1,506 individuals planted.	C
RMP 2	Section 3.1 Revegetation objectives and scope Planting of 6200 tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species will occur within "revegetation areas" totalling a maximum of 9.14 ha in size and areas intended for managed landscaping (landscaping areas) totalling 1.23 ha within the total offset site (10.8 ha).	Refer to RMP 7.	M01_2021 revegetation monitoring (Rev 0)	The requirement to plant 6200 tree or shrub plants including no less than 3000 plants that are potential breeding habitat and no less than 3200 plants that are foraging species was achieved in 2016.	C
RMP 3	Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ <ul style="list-style-type: none"> - No greater than 10% weed cover. - No Declared Plants or weeds of national environmental significance. 	At completion.	Management advice on 27/04/2022 Site Inspection 27/04/2022 M01_2021 revegetation monitoring (Rev 0)	The annual revegetation monitoring survey undertaken on 13/10/2021 (M01) identified: <ul style="list-style-type: none"> • Quadrats 2 and 4 did not meet completion criteria. • Quadrats 1, 3, 5, 6, 7 and 8 met completion criteria. <p>Quadrat 2 and 4 recorded approximately 15% weed cover. Quadrat 2 had patches of *Melilotus indicus and *Vicia sativa among other herbaceous weed and Quadrat 4 was infested chiefly with *Brassica tournefortii.</p> <p>Quadrats 1, 3, 5, 6, 7 and 8 recorded weed foliage cover of 5% or less.</p> <p>As a result of weed spraying, Quadrats 1 and 7 had recovered (they recorded weed foliage cover of between 20 and 30% in the previous monitoring period October 2020)</p> <p>No declared plants or weeds of national environmental significance were reported in the monitoring report.</p>	PNC
RMP 4	Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ <ul style="list-style-type: none"> - Implement contingency measures as outlined in section 6 if grazing is observed on planted seedlings. 	At completion.	M01_2021 revegetation monitoring (Rev 0)	No grazing by pest animals or insects was observed within the landscape area. Stress on Banksia spp. due to herbivory was identified during vegetation monitoring in the revegetation areas. Grazing does not meet 20% threshold where contingency measures are required. Current remedial actions that will be implemented are to continue infill planting and use of Corflute Guards.	C
RMP 5	Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ Establish local provenance species as detailed in Table 6 through seedling planting. Table 6: <i>Acacia saligna, Allocasuarina fraseriana, Banksia attenuata, Banksia baxteri, Banksia coccinea, Banksia hookeriana, Banksia nivea, Banksia sessilis, Corymbia calophylla, Corymbia ficifolia, Eremophila glabra, Eucalyptus marginata, Eucalyptus gomphocephala, Eucalyptus preissiana, Eucalyptus rudis, Grevillea bipinnatifida, Grevillea paniculata, Grevillea wilsonii, Hakea amplexicaulis.</i>	At completion.	E005_Transen Black Swan Post Activity Report E004_Tubestock Peet Lakelands Revegetation - Information request	Species planted in July 2021 were from within Northern Swan Coastal Plain (not 50km of the Lakelands site but compliant with the requirements of Table 10 'Source tubestock grown from seed collected from the Swan Coastal Plain'): <ul style="list-style-type: none"> • <i>Banksia attenuata*</i> • <i>Corymbia calophylla</i> • <i>Eucalyptus marginata</i> • <i>Banksia grandis*</i> • <i>Banksia menziesii*</i> <p><i>*These are Carnaby breeding or foraging species as per EPBC 2013/7048</i></p>	C
RMP 6	Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ Ensure management actions as detailed in section 4 are complied with.	Refer to item 17–23.	Refer to items RMP 10-15 and 17-23	Refer to items RMP 10-15 and 17-23	C
RMP 7	Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ Plant a minimum of 6200 tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species of local within the 10.8 ha offset site.	At completion.		On completion of project	N/A
RMP 8	Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ Achieved 80% survival of planted potential breeding species and 80% survival of planted foraging species within the offset site ten years from the planting completion date.	At completion.		On completion of project	N/A
RMP 9	Section 4.1.1 Revegetation areas Seedlings will be propagated in an accredited nursery from seed collected from within a 50 km radius of the revegetation site. This radius may need to be extended if the relevant local government have restrictions on seed collection at the time seed collection is required.	Prior to revegetation activities taking place.	E005_Transen Black Swan Post Activity Report E004_Tubestock Peet Lakelands Revegetation - Information request	See RMP 5 Species planted in July 2021 were from within Northern Swan Coastal Plain (not 50km of the Lakelands site but compliant with the requirements of Table 10 'Source tubestock grown from seed collected from the Swan Coastal Plain').	C
RMP 10	Table 3: Management actions (revegetation areas) Undertake a site inspection to identify the weed species, locations and abundance within revegetation areas.	Prior to revegetation	M01_2021 revegetation monitoring (Rev 0)	The annual revegetation monitoring survey undertaken on 13/10/2021 (M_001) identified weed species, locations and abundance within the revegetation areas.	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
		activities taking place.			
RMP 11	Table 3: Management actions (revegetation areas) Undertake weed control (as described in section 4.2) at the revegetation areas based on the results of the site inspection at least twice prior to commencing revegetation activities.	Prior to seedling planting taking place in accordance with chemical specifications.	E005_Trane Black Swan Post Activity Report E010_Tax Invoice ES11999 E011_Tax Invoice ES12000 E012_Tax Invoice ES12018	Workpower are contracted by Peet to undertake works within the revegetation area. Records of weed control being undertaken in the form of an invoice for weed spraying in March/June/July and September 2021. It can therefore be determined that spraying at the site occurred twice before planting on was undertaken on the 07/07/2021 as per 4.2 requirement.	C
RMP 12	Table 3: Management actions (revegetation areas) Undertake seedling planting as described in Section 4.3.	After the completion of initial weed control.	E005_Trane Black Swan Post Activity Report E008_Revegetation Management Plan v8 E003_2021 Rainfall Statistics	Seedling planting undertaken in July 2021; compliance per 4.3 as follows: <ul style="list-style-type: none"> Seed for seedlings was collected in accordance with Table 10 Seedling planting rather than direct seeding was undertaken All species except <i>Banksia grandis</i> and <i>Banksia menziesii</i> were from the species provided in Table 6 and <i>Banksia grandis</i> and <i>Banksia menziesii</i> are listed as potential breeding or foraging species for black cockatoos (4.3.1.1) (EPBC 2013/7048) Seedling planting was undertaken 07/07/2021 within one month of first winter rains (June) Stocking rate meets indicative stocking rate requirements 5578 seedlings/ha Tubestock was 6-12 months old as per requirement Supplementary planting was undertaken in Zone 1 	C
RMP 13	Table 3: Management actions (revegetation areas) Install a minimum of three stakes and a protective guard around each seedling to provide micro-climate control and protect the vegetation from grazing by feral and native herbivorous animals (i.e., rabbits and kangaroos) and wind damage.	After seedling planting.	E005_Trane Black Swan Post Activity Report Site Inspection 27/04/2022 Management Advice 27/04/2022	Purpose built (Corflute) triangular staked tree guards have been installed around each seedling in July 2021 and were observed around other seedlings during site inspection. Recommendation There was one location on the west side of the lake where multiple (>40) tree guards were laying on the ground and in places around large shrubs. It is recommended that these are removed and disposed of.	C
RMP 14	Table 3: Management actions (revegetation areas) Ensure all plants and other materials used in revegetation are free of dieback and weeds.	Prior to revegetation activities taking place.	E013_Plantrite NIASA Cert21 E005_Trane Black Swan Post Activity Report	Infill planting occurred in 2021. Plants and other materials were sourced from a NIASA approved nursery Plantrite with no dieback or weeds. Trane Report shows evidence of hygiene controls implemented	C
RMP 15	Table 3: Management actions (revegetation areas) Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering revegetation areas.	At all times.	E005_Trane Black Swan Post Activity Report E006_Workpower hygiene checklist	Trane Report shows evidence of hygiene control Workpower are engaged by Strategen-JBS&G to undertake works within the revegetation areas on behalf of Peet. Hygiene inspection records were provided for all on site activity.	C
RMP 16	Section 4.1.2 Landscaping area Seedlings will be propagated in an accredited nursery from seed collected from within a 50 km radius of the revegetation site. This radius may need to be extended if the relevant local government have restrictions on seed collection at the time seed collection is required.	Prior to revegetation activities taking place.	E010_Trane Advice 28042022	Tubestock grown from seed collected within 50km of the revegetation site was not available for infill planting. The contingency action as per Table 10 'Source tubestock grown from seed collected from the Swan Coastal Plain' was implemented.	C
RMP 17	Table 4: Management actions (landscaping areas in the offset site) Undertake a site inspection to identify the weed species, locations and abundance within the landscaping areas.	Prior to revegetation activities taking place.	M01_2021 revegetation monitoring (Rev 0)	The annual revegetation monitoring survey undertaken on 13/10/2021 (M_001) identified weed species, locations and abundance within the revegetation areas.	C
RMP 18	Table 4: Management actions (landscaping areas in the offset site) Undertake weed control (as described in section 4.1.2) at the landscaping areas based on the results of the site inspection at least twice prior to commencing revegetation activities.	Prior to seedling planting taking place in accordance with chemical specifications.	Management Advice 27/04/2022	No planting of seed or seedlings was undertaken in the landscaping area during this audit period.	N/A
RMP 19	Table 4: Management actions (landscaping areas in the offset site) Undertake ongoing maintenance weed control as described in section 4.1.2.	Biannually (as necessary) until responsibility of managing the revegetation site is transferred to City of Mandurah.	E014_Log Sheet of BSL E015_Chem Spray Diary 2021_22	Ongoing maintenance weed control in the form of spot spraying was undertaken in the landscaping area fortnightly during the audit period.	C
RMP 20	Table 4: Management actions (landscaping areas in the offset site) Undertake seedling planting as described in Section 4.3.	After the completion of initial weed control.	Management Advice 27/04/2022	No planting of seed or seedlings was undertaken in the landscaping area during this audit period.	C
RMP 21	Table 4: Management actions (landscaping areas in the offset site)	After seedling planting.	Management Advice 27/04/2022	No planting of seed or seedlings was undertaken in the landscaping area during this audit period.	N/A

Reference	Condition	Timing	Evidence	Comments	Conformance status
	Install a minimum of three stakes and a protective guard around each seedling to provide micro-climate control and protect the vegetation from grazing by feral and native herbivorous animals (i.e., rabbits and kangaroos) and wind damage.				
RMP 22	Table 4: Management actions (landscaping areas in the offset site) Ensure all plants and other materials used in revegetation are free of dieback and weeds.	Prior to revegetation activities taking place.	Management Advice 27/04/2022	No planting of seed or seedlings was undertaken in the landscaping area during this audit period.	N/A
RMP 23	Table 4: Management actions (landscaping areas in the offset site) Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering landscaping areas.	At all times.	E016_Inspection Checklist	Dieback protocols are required to prevent introduction of <i>Phytophthora cinnamomic</i> to the Black Swan offset site. The Horizon West Inspection Checklist identifies dieback management at the site as a hazard and notes that "Phytoclean use".	C
RMP 24	Section 4.2 Weed control techniques will comprise of chemical controls identified in Table 5 Table 5: Initial broad scale spray herbicide application (using towed boom spray rigs) Spot spray herbicide application Stem injection, cut and paint.	At all times.	E015_Chem Spray Diary 2021_22 E017_Chemical Application Records Feb 22 E010_Tax Invoice ES11999 E011_Tax Invoice ES12000 E012_Tax Invoice ES12018	Horizon West Chemical Spray Diary documents the volume of chemical applied on each spraying occasion in the landscaping area in the audit period. February 2022 chemical application records for revegetation area document the volume of chemical applied via spot spray. The records for June/July and August weed control document chemical supply. Recommendation: Weed Control Record Collation is improved.	C
RMP 25	Section 4.2 Weed control will commence in winter, prior to revegetation activities commencing. This will be in the form of a broad scale weed spray over the revegetation site to reduce initial weed loads prior to planting.	Prior to revegetation activities taking place.	E005_Tranen Black Swan Post Activity Report	Tranen Report documents weed spraying conducted prior to revegetation works.	C
RMP 26	Section 4.2 Follow up weed control activities will be in the form of spot spraying around planted seedlings. Weed control post planting will be focussed on the immediate areas surrounding planted seedlings (e.g., 1 m radius around planted seedlings).	After seedling planting.	E010_Tax Invoice ES11999 E011_Tax Invoice ES12000 E012_Tax Invoice ES12018 E017_Chemical Application Records Feb 22	Spot spraying was undertaken in August 2021 and February 2022 however there is no evidence to substantiate that the spraying was done at the planted seedling location. The photos provided are of large shrubs with no images of tree guards.	PNC
RMP 27	Section 4.2 Weed control will be undertaken by Peet until handover of management to the site to the City of Mandurah.	Until handover of management to the site to the City of Mandurah.	Management Advice 27/04/2022 E015_Chem Spray Diary 2021_22 E017_Chemical Application Records Feb 22 E010_Tax Invoice ES11999 E011_Tax Invoice ES12000 E012_Tax Invoice ES12018	Management advised that PEET and their contractors have undertaken all weed control on site to date. Handover to the City of Mandurah (CoM) is not expected until approximately 3 year's time.	C
RMP 28	Section 4.3 Plants used in revegetation activities will be propagated from native seed collected from the local area. Seed will be collected from a 50 km radius from the revegetation site by licensed seed collectors.	Refer to RMP 9.	E010_Tranen Advice 28042022	Seedlings grown from seed collected within 50km of the revegetation site was not available for infill planting. The contingency action as per Table 10 'Source tubestock grown from seed collected from the Swan Coastal Plain' was implemented.	C
RMP 29	Section 4.3 Only species defined within EPBC 2013/7048 as potential breeding or foraging species for black cockatoos (Tuart, Marri, Jarrah, <i>Acacia saligna</i> , <i>Banksia attenuata</i> , <i>Banksia grandis</i> , <i>Banksia menziesii</i> and <i>Allocasuarina fraseriana</i> species) will be considered as part of the 6200 plants that are required to be planted.	At all times.	E005_Tranen Black Swan Post Activity Report E008_Revegetation Management Plan v8	This commitment was achieved in a previous audit period. Infill planting included the Black Cockatoo foraging and breeding species <i>Banksia attenuata</i> , <i>Banksia grandis</i> and <i>Banksia menziesii</i> .	C
RMP 30	Section 4.3 Seed collection will be undertaken in late-spring to summer of the year preceding planting activities.	Late-spring to summer of the year preceding planting activities.	E013_Plantrite NIASA Cert21 R01_Lakelands East Annual Compliance Report 2021	Provenance seed was not utilised by the nursery and there is no clear record of the age of the seed utilised for the seedlings. The seedlings were all healthy despite this non compliance with the RMP. This was also a non-compliance in 2021 with a recommendation for an update the RMP commitment in 2021. Recommendation: This action should be amended to state that seeding in nurseries is to occur in late spring to summer removing the timeframe on seed collection.	PNC
RMP 31	Section 4.3 Due to the nature of the revegetation site (i.e., overstorey species and limited good quality topsoil), habitat creation will be focussed on seedling planting rather than direct seeding to maximise potential for revegetation success. As a result, no initial site works (e.g., ripping, scarifying or topsoil transfer) will be required.	During seedling planting.	E005_Tranen Black Swan Post Activity Report	Seedlings were planted of: <ul style="list-style-type: none"> • <i>Banksia attenuata</i>* • <i>Corymbia calophylla</i> • <i>Eucalyptus marginata</i> • <i>Banksia grandis</i>* • <i>Banksia menziesii</i>* 	C
RMP 32	Section 4.3 Seedling planting will be undertaken in early winter, within one month of the first rains.	Early winter, within one month of the first rains.	E005_Tranen Black Swan Post Activity Report E003_2021 Rainfall Statistics	Seedling planting was undertaken 07/07/2021 within one month of first winter rainfall The wet season lasted through to October (97.6mm in October) so there was an excellent establishment period for the seedlings. However it should be noted that the break of season occurred start of May 05/05/2021 (56mm) with a total rainfall for May of 116mm.	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
RMP 33	Section 4.3 If the target stocking rate is not met (determined by revegetation monitoring) contingency actions as described in Section 6 will be implemented.	Refer to item 51 – 57.	M01_2021 revegetation monitoring (Rev 0)	The annual revegetation monitoring survey 13/10/2021 determined that the stocking rate is being met. contingency actions were required to be implemented during the audit period.	C
RMP 34	Section 4.3 Seedlings (in the form of Tubestock) used for planting should be suitably mature, between 6 to 12 months to enable optimal establishment and growth.	During revegetation.	E013_Plantrite NIASA Cert21	Infill planting occurred in winter 2021, the tubestock that was used was 6-12 months old. Standard nursery practice to undertake seeding between October to December of the previous year.	C
RMP 35	Section 4.3 Tubestock should also not be root bound and planting should be undertaken as follows: <ul style="list-style-type: none"> optimal location of each species at the site should be chosen at the time of planting to ensure appropriate condition for each species (e.g., topography, shade/sun, soil moisture etc) seedling should be planted so that the stem is vertical and the base of the plant is slightly below the original soil surface soil surrounding the seedling root ball should be pressed in firmly to avoid air pockets a minimum of three stakes and a protective guard manufactured for such purpose should be placed around the seedling to protect the vegetation from grazing and wind damage. 	During revegetation.	E005_Tranen Black Swan Post Activity Report	Infill planting was undertaken 07/07/2021. Planting was in a mostly cleared area (Drawing '2021 Planting Area') with a tree planting device (Pottiputki). Tranen Post Activity Report presents photographs of the seedlings planted vertically and covered with a triangular tree guard	C
RMP 36	Section 4.3 If during monitoring plant stress is observed a wetting agent or additional watering options will be investigated as described in Table 10.	Refer to item 55.	M01_2021 revegetation monitoring (Rev 0)	Results of annual monitoring of revegetation and landscaping areas on 13/10/2021 did not identify water stress in seedlings planted.	C
RMP 37	Section 4.3 If monitoring determines that revegetation requires supplementary seedling planting in subsequent years, this will be undertaken prior to the main winter rainfall, within one month of the first rains and following the required soil preparation and weed treatment as described in Table 10.	Refer to item 52.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 E005_Tranen Black Swan Post Activity Report	2020 Monitoring identified need for further infill planting which was undertaken in July 2021. Tranen Report documents weed spraying conducted prior to revegetation works. No soil treatment was required. See RMP 32.	C
RMP 38	Section 4.4 Tree guards are to be installed around planted seedlings which will provide protection from browsing animals.	Refer to item 35.	Site inspection on 27/04/2022	Purpose built (Corflute) triangular staked tree guards have been installed around each seedling in July 2021 and were observed around other seedlings during site inspection.	C
RMP 39	Section 4.5 Hygiene measures To reduce the risk of introducing dieback into the offset site, seed sources to be used in tubestock will be propagated by a NIASA (Nursery Industry Accreditation Scheme of Australia) accredited nursery.	Prior to revegetation activities taking place.	E013_Plantrite NIASA Cert21	Seedlings that were used in the 2021 infill planting were dieback free and propagated by a NIASA accredited nursery	C
RMP 40	Section 4.5 Hygiene measures Vehicles, machinery, equipment and footwear will also be free of mud and soil when entering the offset site.	During revegetation.	Management Advice 27/04/2022	No vegetation activities occurred in the offset area in the audit period	N/A
RMP 41	Section 4.7 Conservation mechanism A conservation covenant under one of the following legislative mechanisms will be applied over the offset site by 30 June 2019: Transfer of Land Act 1893 Soil and Land Conservation Act 1945 National Trust of Australia (WA) Act 1964.	By 30 June 2020.	Management Advice 27/04/2022 R09_Lakelands Record of Certificate of Title R11_Document Restrictive Covenant in Deed O355250_1	A Record of Certificate of Title for Lakelands East was provided, numbered item 16 states a Restrictive Covenant to City of Mandurah as to Portion only was registered 11/03/2020. Additional details on the Restrictive Covenant can be seen in R11 showing the agreement between the City of Mandurah and Peet.	C
RMP 42	Section 5.1.1 Revegetation areas Monitoring plots will be established within revegetation areas to enable monitoring data to be collected. Six 10 m by 10 m monitoring plots will be set up within revegetation areas taking into consideration species type, topography etc.	Every three years.	Site Inspection 27/04/2022 M01_2021 revegetation monitoring (Rev 0) E008_Revegetation Management Plan v8	The annual revegetation monitoring survey undertaken on 13/10/2021 monitored seven permanent 10 m by 10 m monitoring plots within the revegetation area. It is noted that revegetation monitoring is being undertaken annually which is more frequent than required by the RMP (every 3 years).	C
RMP 43	Section 5.1.1 Revegetation areas Each plot will be divided into five 1 m x 1 m quadrats based on a method provided by Dr Eleanor Bennett (Bennett E [Bennett Environmental Consulting Pty Ltd] 2012, pers. comm. 10 September).	Every three years.	C15_Strategen-JBS&G Revegetation monitoring methods_18022020	Correspondence from the revegetation monitoring consultant advised that this monitoring method is useful as a "subsampling" method for rehabilitation sites with very high plant density. Plant density is recorded within each subplot and then averaged over the total area of all the subplots within the rehabilitation area. However, plant density at Lakelands has not reached a sufficient level to require subsampling; rather, a total count of all plants within each 10 x 10m quadrat was undertaken. This ultimately provides a more accurate record of plant density than subsampling.	N/A
RMP 44	Section 5.1.1 Revegetation areas Data will be collected from each of the five 1 m x 1 m quadrats, in order to enable collection of representative data from each quadrat. Data collected from each quadrat will include: <ul style="list-style-type: none"> flora species composition vegetation structure 	Every three years.	M01_2021 Revegetation Monitoring (Rev 0)	The annual revegetation monitoring survey/report undertaken on 13/10/2021 and data was collected on the required parameters. Data collected from each quadrat included: <ul style="list-style-type: none"> flora species composition vegetation structure 	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
	<ul style="list-style-type: none"> density of flora species. Numbers of trees will be recorded from the entire 10 m by 10 m monitoring plot to obtain an appropriate representative sample.			<ul style="list-style-type: none"> density of flora species. Numbers of trees were recorded from the entire 10 m by 10 m monitoring plot to obtain an appropriate representative sample.	
RMP 45	Section 5.1.1 Revegetation areas Each plot will be monitored every three years during spring (commencing in spring 2019) as per Table 8 until handover (anticipated to be handed over to CoM in 2026).	Every three years.	M01_2021 Revegetation Monitoring (Rev 0) Management Advice 27/04/2022	The annual revegetation monitoring survey was undertaken on 13/10/2021 within the revegetation area. It was noted that revegetation monitoring is being undertaken annually which is more frequent than required by the RMP (every 3 years).	C
RMP 46	Section 5.1.2 Landscaping areas Landscaping areas within the offset site will be monitored at the same time as revegetation areas. Monitoring within landscaping areas will comprise of a visual observation of plant health. Any occurrences of the following will be recorded: <ul style="list-style-type: none"> plant stress plant mortality weed species. 	Every three years.	M01_2021 Revegetation Monitoring (Rev 0)	Observations in landscaping areas were undertaken on 13/10/2021 at the same time as the revegetation monitoring was undertaken. Observations included a visual assessment of plant health, recording instances of stress and mortality in native plants; in addition, information relating to weed presence and foliage cover was recorded and photographed.	C
RMP 47	Table 9: Monitoring program for revegetation and landscaping areas within the offset site Opportunistic observation during monitoring: a. Plant health (i.e., evidence of water stress, pests, animal grazing).	3 yearly.	M01_2021 Revegetation Monitoring (Rev 0)	Annual monitoring for the revegetation and landscaping areas was undertaken on 13/10/2021 and included observations on plant health (e.g., plant stress, mortality and grazing) in both areas.	C
RMP 48	Table 9: Monitoring program for revegetation and landscaping areas within the offset site Monitoring of quadrats. a. Plant density b. Species richness c. Plant health (i.e., evidence of water stress, pests, animal grazing).	3 yearly.	M01_2021 Revegetation Monitoring (Rev 0)	Monitoring of seven permanent monitoring plots established within the revegetation area were assessed on 13/10/2021 and included species composition of planted flora, abundance of each planted flora species and native plant health. Monitoring plots within the landscaping area is not a requirement of the RMP.	C
RMP 49	Table 9: Monitoring program for revegetation and landscaping areas within the offset site Observation during monitoring. a. Weed species.	Annually until handover to the CoM.	M01_2021 Revegetation Monitoring (Rev 0)	Annual monitoring of weed species in the revegetation and landscaping areas was undertaken on 13/10/2021. Monitoring included observations and recordings of weed species cover (revegetation areas) and weed presence and foliage cover (landscaping areas).	C
RMP 50	Section 6: Contingency measures Contingency actions will be initiated if monitoring indicates that management actions detailed for revegetation areas (Table 3) and landscaping areas within the offset site (Table 4) have not been successful or effective and/or completion criteria are not being achieved (Table 10).	Every three years.	M01_2021 Revegetation Monitoring (Rev 0) E008_Revegetation Management Plan v8	Monitoring 13/10/2021 further identified greater than 10% weed cover on two monitoring plots. See RMP 56 for contingency measures. Tubestock grown from seed collected within 50km of the revegetation site was not available for infill planting. The contingency action as per Table 10 'Source tubestock grown from seed collected from the Swan Coastal Plain' was implemented.	PNC C
RMP 51	Section 6: Contingency measures Where contingency actions are required to be implemented, they will be reported to DotE as part of the EPBC Act annual environmental reporting requirements, as detailed in Section 8.	As required.	R01_Lakelands East ACR (Rev 0) 2021 E002_Peet Website View ACR	This audit table forms part of the EPBC 2013/7048 Annual Audit Compliance Report.	C
RMP 52	If any of the 3 yearly assessment reports determine that survival rates of planted potential breeding species or planted foraging species are below 80 percent. 2. Identify cause. 3. Implement approach to remedy cause which could include: <ul style="list-style-type: none"> collecting additional provenance seed for plant propagation to compensate for the insufficient native plant species richness and/or cover undertaking infill seedling planting within 12 months of the date of survey application of additives such as Seasol, water granules, soil breaker, water retainer, wetting agent or fertiliser tablets as deemed necessary by revegetation contractor. further weed and/or pest control if required post infill planting. 4. Monitor success of contingency measure(s).	As required.	M01_2021 Revegetation Monitoring (Rev 0)	The 2020 Revegetation Monitoring Survey conducted on 28/10/2020 identified that the target density for breeding species is 465 plants / ha (80% of 3000 plants over 5.16 ha). The recorded density was 475/ha ± 215 plants / ha. The target density for foraging species is 496 plants / ha (80% of 3200 plants over 5.16 ha). The recorded density was 913/ha ± 359 plants / ha. No contingency measures were required	N/A
RMP 53	Approximately 20% of seedlings planted show evidence of damage by animal (i.e., grazing). 5. Implement measures to prevent further damage which could include: <ul style="list-style-type: none"> animal control program installation of temporary fencing application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required applying wetting agent or supplementary watering removing damaged plants and replanting providing alternate species suitable to the site and provenance requirements. 6. Monitor success of contingency measure(s).	As required.	M01_2021 Revegetation Monitoring (Rev 0)	Annual monitoring of revegetation and landscaping areas was undertaken on 13/10/2021. No evidence of damage by animal grazing was reported from landscaped areas. Evidence of herbivory by kangaroos was reported in the revegetation area but not 20%. Recommendations included maintaining the tree guards and conducting infill planting in 2022. Passive measures taken in 2020/21 have not exacerbated the problem. Success of the contingency measures will be monitored during the 2022 revegetation monitoring survey.	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
RMP 54	Approximately 20% of seedlings planted show evidence of damage by pests. 1. Implement measures to prevent further damage which could include: <ul style="list-style-type: none"> animal control program installation of temporary fencing application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required applying wetting agent or supplementary watering removing damaged plants and replanting providing alternate species suitable to the site and provenance requirements. 2. Monitor success of contingency measure(s).	As required.	M01_2021 Revegetation Monitoring (Rev 0)	Annual monitoring of revegetation and landscaping areas was undertaken on 13/10/2021. No evidence of damage by pests was reported.	N/A
RMP 55	Approximately 20% of seedlings planted show evidence of water stress. 1. Implement measures to prevent further damage which could include: <ul style="list-style-type: none"> animal control program installation of temporary fencing application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required applying wetting agent or supplementary watering removing damaged plants and replanting providing alternate species suitable to the site and provenance requirements. 2. Monitor success of contingency measure(s).	As required.	M01_2021 Revegetation Monitoring (Rev 0)	Results of annual monitoring of revegetation and landscaping areas on 13/10/2021 did not identify water stress in seedlings monitored.	N/A
RMP 56	No greater than 10% weed cover No Declared Plants or weeds of national environmental significance 1. Investigate cause (e.g. adjacent sources of weed seed). 2. Implement measures to remove weeds (e.g. weed control) as practicable. 3. Monitor success of contingency measure(s).	As required.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 M01_2021 Revegetation Monitoring (Rev 0)	During the 2020 monitoring Quadrat 1, 2, and 7 recorded between 20% and 30% weed cover. Quadrats 1, 2, and 7 contained heavy weed infestations, largely comprising <i>Briza sp.</i> , <i>Ehrharta sp.</i> , <i>Avena barbata</i> , <i>Lupinus cosentinii</i> and other grassy weed species. Weed spraying was undertaken October, November, December 2020 and June/July 2021, August 2021. During monitoring activities 13/10/2021 Quadrats 1 and 7 recorded below 5% weed cover. Quadrat 2 and 4 recorded approximately 15% weed /cover. Quadrat 2 had patches of *Melilotus indicus and *Vicia sativa among other herbaceous weed and Quadrat 4 was infested chiefly with *Brassica tournefortii. No declared plants or weeds of national environmental significance were identified during the monitoring. Weed control program is to continue. Success of the contingency measures will be monitored during the 2022 revegetation monitoring survey.	C
RMP 57	Unauthorised access (people and vehicles). 1. Implement measures to prevent further unauthorised access (e.g. installation of temporary fencing and signage), as practicable. 2. Monitor success of contingency measure(s).	As required.	Site inspection 27/04/2022 R01_ Lakelands East ACR (Rev 0) 2021	No unauthorised access evident. Only evidence of access is by maintenance through secure bollard system.	C
RMP 58	Section 7 Plan implementation This RMP will be implemented by Peet until responsibility of the revegetation site is transferred to the City of Mandurah (CoM).	Until responsibility of the revegetation site is transferred to the City of Mandurah.	R01_ Lakelands East ACR (Rev 0) 2021	PEET maintained responsibility of the implementation of the RMP throughout the audit period. Handover from PEET to the CoM is not scheduled for approximately 3 years	C
RMP 59	Section 7 Plan implementation The revegetation site will be vested as Crown Reserve designated as Public Open Space (POS), with management vested to the City of Mandurah under Section 152 of the <i>Planning and Development Act 2005</i> .	At handover.		Handover from PEET to the CoM is not scheduled for approximately 3 years	N/A
RMP 60	Section 7.1 Roles and responsibilities All contractors and staff will be required to operate in accordance with this RMP.	At all times.	Management Advice 27/04/2022 Site Inspection 27/04/2022 M01_2021 revegetation monitoring (Rev 0) E005_Tranen Black Swan Post Activity Report E010_Tax Invoice ES11999 E011_Tax Invoice ES12000 E012_Tax Invoice ES12018 Site Inspection 27/04/2022 E016_ Inspection Checklist	Management advised that all contractors and staff are required to operate in accordance with the RMP. Records are not complete to be able to verify that all contractors and staff are operating in accordance with the RMP (25, 26). Monitoring Plots 2 and 4 do not meet their completion criteria (3, 50). There is an inconsistency between the seed collection timing specified in the RMP and the timing possibly delivered by the nursery (30).	PNC

Reference	Condition	Timing	Evidence	Comments	Conformance status
			E017_Chemical Application Records Feb 22 E013_Plantrite NIASA Cert21 R01_Lakelands East Annual Compliance Report 2021 E008_Revegetation Management Plan v8	Recommendation: It is recommended that: <ul style="list-style-type: none"> • Weed spraying is continued • Record keeping for weed control records is improved • The Revegetation Management Plan is amended to increase flexibility regarding seed collection. 	

© JBS&G Australia Pty Ltd T/A Strategen-JBS&G

This document is and shall remain the property of Strategen-JBS&G. The document may only be used for the purposes for which it was commissioned and in accordance with the Terms of Engagement for the commission. Unauthorised use of this document in any form whatsoever is prohibited.

Document Distribution

Rev No.	Copies	Recipient	Date
A	1 x electronic	A. Winzer	2/05/2022

Document Status

Rev No.	Author	Reviewer	Approved for Issue		
		Name	Name	Signature	Date
0	A.Wills	A. Winzer	A. Winzer		2/05/2022

