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# 'Lakelands East' Residential Development, Mandurah, WA

Annual Compliance Report  
(EPBC 2013/7048)

Prepared for  
Peet Mandurah Syndicate Limited  
by Strategen

May 2018



# **'Lakelands East' Residential Development, Mandurah, WA**

**Annual Compliance Report  
(EPBC 2013/7048)**

Strategen is a trading name of  
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May 2018

## ***Limitations***

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### **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.

## **Client: Peet Mandurah Syndicate Limited**

Report Version	Revision No.	Purpose	Strategen author / reviewer	Submitted to Client	
				Form	Date
Draft Report	A1	Client review	J Hossain / T George	Electronic	26 April 2018
Final Report	0	Publication on website	T. George/ T Bowra	Electronic	2 May 2018

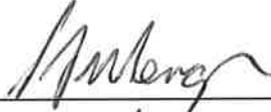
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## Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed



Full name (please print)

PAUL MORGAN

Position (please print)

DEVELOPMENT DIRECTOR

Organisation (please print including ABN/ACN if applicable)

Peet Limited

Date

2, 5, 2018



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## 1. Introduction

This report addresses the status and compliance of implementation of the 'Lakelands East' Residential Development with the conditions in *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval 2013/7048 (EPBC 2013/7048). 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, the project) located approximately 65 km south of the Perth Central Business District.

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

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 the Environment and Energy [DEE]) 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).

A request to vary condition 11 of EPBC 2013/7048 was submitted on 22 January 2016, with the request approved on 9 May 2016, during the previous audit period. 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 (2 February 2017 to 1 February 2018) included:

- Stage 66 civil works completed
- landscaping around Black Swan Lake completed in July 2017
- community tree planting completed north of Black Swan Lake in revegetation areas
- implemented program for infill planting in revegetation areas
- infill tree planting completed south-west of Black Swan Lake in revegetation areas
- update of Revision 6 of the RMP, approved by DEE in October 2017.

### 3. Audit methodology

#### 3.1 Audit plan

##### 3.1.1 Purpose and scope

This document has been prepared for Peet (the approval holder) to fulfil the requirements of condition 8 of EPBC 2013/7048. Condition 8 requires the approval holder to publish an annual report for the previous twelve-month period, addressing compliance with each condition of EPBC 2013/7048; as follows:

*'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.'*

This Annual Compliance Report (ACR) addresses the audit period between 2 February 2017 and 1 February 2018 for the conditions of EPBC 2013/7048 and implementation of the RMP required by conditions 3 and 4 of EPBC 2013/7048.

##### 3.1.2 Methodology

The audit was undertaken in April 2018 and involved a site inspection, interviews with key members of the project team and a review of documentation to support the audit.

Table 1 provides an overview of the personnel consulted as part of the audit.

Table 1 Persons consulted during audit

Person and position	Organisation	Purpose
Jaymi Davies – Assistant Development Manager	Peet	To provide an overview of activities undertaken on site during the audit period to assess implementation and performance of EPBC 2013/7048 conditions.
Alex Growden – Project Manager	Workpower	To provide an overview of activities undertaken on site during the audit period to assess implementation and performance of the RMP.

### 3.2 Audit terminology

The 'Status' field of the audit tables (refer to Section 4) describes the implementation of actions and compliance with the approval. The DEE has issued Annual Compliance Report Guidelines. Terminology from this guidance was applied in this audit (Table 2).

Table 2 Action implementation status

Status	Acronym	Description
<b>Conditions of approval</b>		
Compliant	C	Sufficient evidence is required to confirm that 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	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	NA	The requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.
<b>Management Plans</b>		
Conformant	C	Sufficient evidence is required to confirm that the requirements of the procedures, programs and/or management actions detailed within an Environmental Management Plan or similar document have been satisfactorily met.
Potentially non-conformant	PNC	Considered to be any deviation from the procedures, programs and/or management actions detailed within an Environmental Management Plan or similar document.
Not applicable	NA	The requirements of a 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.

Source: adapted from DotE (2014)

## 4. Audit results

The results of the audit of EPBC 2013/7048 are shown in Table 3. The results of the audit of conformance with the management actions contained within the RMP are outlined in Appendix 1.

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

### 4.1 Compliance with conditions

Of 28 sub-conditions:

- 19 were found to be 'Compliant', with three of those 'Compliant (completed)'
- 8 were found to be 'Not applicable'
- 1 was found to be potentially non-compliant.

The potential non-compliance was with condition 13.2 of the EPBC 2013/7048 approval, which identified the revised RMP (accepted by the DEE on 10 October 2017) was published on Peet's website on 23 January 2018, and therefore, it was beyond the 1-month timeframe for the RMP to be published on Peet's website.

The auditors determined that this potential non-compliance is an administrative technicality and has no material environmental impact. The previously approved RMP (Revision 5) remained on the website until the current revised RMP (Revision 6) was published before the end of the audit period. Only very minor changes were made between Revision 5 and Revision 6, and the changes in the document did not constitute new or increased impact to the environment.

#### 4.1.1 Conformance with the Revegetation Management Plan

Of the 60 key actions identified from the RMP:

- 8 were found to be 'Potentially non-conformant'
- 45 were found to be 'Conformant', of which 2 were identified as 'Conformant (completed)'
- 7 were found to be 'Not applicable'.

The 8 actions found to be potentially non-conformant were:

- RMP 9, 28 and 39 regarding seedlings to be supplied by Nursery Industry Accreditation Scheme Australia (NIASA) nurseries, auditors identified that community tree planting was undertaken north of Black Swan Lake, where the seedlings potentially may not have been from a NIASA nursery
- RMP 21 and 38 regarding measures to protect planted seedlings, auditors observed there were no tree guards on revegetation in the "landscape areas"
- RMP 14, 23 and 40 regarding hygiene measures, where not all revegetation contractors were found to implement hygiene measures prior to entering the "revegetation areas".

The subjects of these potential non-conformances are repeated throughout the management document and therefore multiple non-conformances have been assessed for three issues. The auditors determined these potential non-conformances are minor and have no material environmental impact nor prevent the achievement of the objectives of the RMP.

Table 3: Compliance with conditions of EPBC 2013/7048

Condition Number	Condition	Compliance status	Evidence	Comments
EPBC 1.1	The approval holder must not clear any black cockatoo habitat trees outside of the project area.	Compliant.	Management advice 5 April 2018. Site inspection 5 April 2018. R_004_Strategen_Lakelands East Annual Compliance Report_01052017.	Management confirmed that no black cockatoo habitat trees outside of the project area were cleared during this audit period. No such clearing was observed during site inspection on 5 April 2018.
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.	Compliant.	Management advice 5 April 2018. Site inspection 5 April 2018. R_012_Strategen_Lakelands East - Mandjoogordap Drive, Mandurah Significant Tree Survey Results_02082016. R_011_MNG_Lakelands East Extent of Cleared Areas_04072016. R_013_Strategen_Feb2017_24 042107.	A tree survey was undertaken in 2016. As there were no trees cleared, died or removed during the audit period, this item has been assessed as compliant, based on the 2016 tree survey. The 2016 tree survey (R_012) identified that of the 129 potential breeding trees originally identified to be retained, 126 potential breeding trees remain (one of these potential breeding trees was identified as only potentially to be retained after 'the Hilltop tank' was introduced earlier in 2016). Two trees appeared to have been illegally removed and one tree has fallen down naturally. The survey indicates that more than 120 breeding trees have been retained to date. Although each intact tree was not individually counted, aerial photography (R_011, R_013) indicates most of the project area remains uncleared, including areas containing most foraging species, on this basis the auditors consider 183 foraging tree species have been retained.
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.	Compliant (completed).	R_010_Strategen_Lakelands East Annual Compliance Report_11032016.	This obligation has been previously assessed as Compliant (R_010).  The current revised version (Rev 6) of the RMP was submitted to the DEE on 22 September 2017 and approved on 10 October 2017.
EPBC 3.2	The approval holder must not commence the action unless the Minister has approved the RMP.	Compliant (completed).	R_010_Strategen_Lakelands East Annual Compliance Report_11032016.	This obligation has been previously assessed as Compliant (R_010).

Condition Number	Condition	Compliance status	Evidence	Comments
EPBC 3.3	<p>The RMP must include, but may not be limited to:</p> <p>a. Objectives of the RMP;</p> <p>b. Location, condition, size and suitability of the revegetation areas within the offset site;</p> <p>c. Detailed information on each stage of the revegetation project;</p> <p>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;</p> <p>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;</p> <p>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;</p> <p>g. Monitoring program, including the type, timing and frequency of monitoring;</p> <p>h. Responsibilities for planning, implementing, management, reporting and monitoring the RMP;</p> <p>i. Timeframes for the implementation of each stage of the RMP;</p> <p>j. Details on the conservation mechanism to protect and conserve the offset site.</p>	Compliant	Refer to EPBC 3.2.	<p>The RMP Rev 6 (R_001) includes the required details. Refer to EPBC 3.2 – RMP approved.</p>
EPBC 4.1	<p>If the Minister approves the RMP, then the approval holder must implement the approved RMP.</p>	Compliant	Refer to Appendix 1.	<p>Refer to Appendix 1.</p> <p>Of 60 key actions identified from the RMP:</p> <ul style="list-style-type: none"> <li>• 8 were found to be 'Potentially non-conformant'</li> <li>• 45 were found to be 'Conformant', of which 2 were identified as 'Conformant (completed)'</li> <li>• 7 were found to be 'Not applicable'.</li> </ul>

Condition Number	Condition	Compliance status	Evidence	Comments
EPBC 5.1	<p>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.</p> <p>If any black cockatoos are detected using a hollow in a tree or trees, the approval holder must:</p> <ul style="list-style-type: none"> <li>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;</li> <li>ii. not clear any such tree of any vegetation within 10 metres of any such tree; and</li> <li>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.</li> </ul>	Compliant	<p>Management advice 5 April 2018.</p> <p>Site inspection 5 April 2018.</p> <p>R_012_Strategen_Lakelands East - Mandjoogoordap Drive, Mandurah Significant Tree Survey Results_02082016.</p> <p>R_011_MNG_Lakelands East Extent of Cleared Areas_04072016.</p> <p>R_013_Strategen_Feb2017_24 042107.</p>	Strategen were advised by Peet that no clearing of breeding trees was undertaken during the audit period. As such, this condition is compliant.
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.	Compliant (completed)	R_010_Strategen_Lakelands East Annual Compliance Report_11032016.	This obligation has been previously assessed as Compliant (R_010).
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.	Compliant	This audit report and evidence register substantiates that this condition has been complied with.	<p>Peet has 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.</p> <p>There was no request received from the Department during the audit period.</p>

Condition Number	Condition	Compliance status	Evidence	Comments
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.	Compliant	G_001_Peet_Website ACR_01052017.	The ACR for the audit period (2 February 2016 to 1 February 2017) was published on Peet's website on 1 May 2017.
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.	Compliant	Refer to EPBC 8.1.	Refer to EPBC 8.1.
EPBC 8.3	The compliance reports must remain on the website for the life of the approval.	Compliant	W_001_Strategen_ACR and RMP on website_06042018. Refer to EPBC 8.1.	The ACR for audit period 2016 to 2017 was observed on Peet's website. However, the 2015-16 ACR was not identified on the Peet website, when accessed on 3 April 2018. The 2015 – 2016 ACR was uploaded on the website on 15 April 2018 to ensure this condition remains compliant.
EPBC 8.4	All contraventions must also be included in the compliance reports.	Compliant	R_004_Strategen_Lakelands East Annual Compliance Report_01052017.  Refer to EPBC 8.1.	In the 2015 to 2016 ACR, one potential non-compliance with conditions of EPBC 2013/7048 was reported; and, no potential non-conformances with the requirements of the RMP were identified.  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 requirements of the RMP were reported.
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.	Not applicable	Refer to EPBC 8.1. Management advice 5 April 2018. G_001_Peet_Website ACR_01052017.	The ACR is publicly available through the Peet website. Management advised it had not received any specific request for the ACR.
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.	Not applicable	Management advice 5 April 2018.	Peet confirmed that there were no potential or actual contraventions of the approval for this audit period requiring reporting to the Department.
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.	Not applicable	Management advice 5 April 2018.	Management advised on 5 April 2018 they had not received any such direction from the Minister to conduct an independent audit.
EPBC 10.2	The independent auditor must be approved by the Minister prior to the commencement of the audit.	Not applicable	Refer to EPBC 10.1.	Refer to EPBC 10.1.
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.	Not applicable	Refer to EPBC 10.1.	Refer to EPBC 10.1.

Condition Number	Condition	Compliance status	Evidence	Comments
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.	Compliant	C_001_Strategen_Letter to DEE informing of updates to the RMP_00002017. C_002_Strategen_DEE approval of updates to the RMP_10102017.	The revised RMP (Rev 6) was submitted to the DEE on 22 September 2017 and approval was granted on 10 October 2017 by the DEE. NOTE: The DEE considered that the amendments to the revised RMP are not likely to constitute a 'new or increased impact' on any EPBC Act matter protected by the controlling provisions for the action. On this basis, the officers of the DEE chose not to submit the <i>Black Swan Swamp Revegetation Management Plan, September 2017</i> to the Minister for decision.
EPBC 11.2	If the approval holder makes this choice it must: 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.	Compliant	Refer to EPBC 11.1.	Refer to EPBC 11.1. Strategen updated the approved RMP and, on behalf of Peet, provided a copy and informed the DEE on 22 September 2017, in accordance with Condition 11 of EPBC 2013/7048 (C_001). The DEE considered that the amendments to the revised plan were not likely to constitute a 'new or increased impact' on any EPBC Act matter protected by the controlling provisions for the action. On this basis, officers of the DEE chose not to submit the <i>Black Swan Swamp Revegetation Management Plan, September 2017</i> to the Minister for decision. The DEE acknowledged that the revised plan will be implemented and published on Peet's website in accordance with condition 13 of the approval.
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.	Not applicable	Refer to EPBC 11.1.	Refer to EPBC 11.1.
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.	Compliant	Refer to EPBC 11.1.	Refer to EPBC 11.1.

Condition Number	Condition	Compliance status	Evidence	Comments
EPBC 11.5	<p>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:</p> <p>i. Condition 11 does not apply, or ceases to apply, in relation to the revised RMP; and</p> <p>ii. The approval holder must implement the RMP approved by the Minister.</p> <p>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.</p> <p>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.</p>	Compliant	C_002_Strategen_DEE approval of updates to the RMP_10102017.	The DEE considered that the amendments to the revised RMP are not likely to constitute a 'new or increased impact' on any EPBC Act matter protected by the controlling provisions for the action. On this basis, the officers of the DEE chose not to submit the <i>Black Swan Swamp Revegetation Management Plan, September 2017</i> to the Minister for decision.
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.	Not applicable	This is taken to be a note and therefore, not assessable.	This is taken to be a note and therefore, not assessable.
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.	Not applicable	Management advice 5 April 2018.	Management Approval holder advised that no such request from the Minister has been received.
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.	Compliant	Refer to EPBC 11.2.	Refer to EPBC 11.2. Revision 6 of the RMP was implemented during the 2017 to 2018 audit period.
EPBC 13.1	Unless otherwise agreed to in writing by the Minister, the approval holder must publish the revised RMP on its website.	Compliant	W_001_Strategen_ACR and RMP on website_06042018.	The current version (Rev 6) of the RMP was identified on the Peet website, when accessed on 3 April 2018.

Condition Number	Condition	Compliance status	Evidence	Comments
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.	Potentially non-compliant	C_003_Strategen_RE Peet Lakelands East ACR_17042018.	<p>The revised RMP (approved on 10 October 2017) was published on Peet's website on 23 January 2018 and therefore, it was outside the 1-month timeframe of being approved or submitted.</p> <p>The Auditors determined that this potential non-compliance is an administrative technicality and has no material environmental impact. The previously approved RMP (Revision 5) remained on the website until the current revised RMP (Revision 6) was published before the end of the audit period. Only very minor changes were made between Revision 5 and Revision 6, and the changes in the document did not constitute new or increased impact to the environment.</p>

## 5. References

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



**Appendix 1**  
**Audit of implementation of**  
**Revegetation Management Plan**



Revegetation Management Plan audit table

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 1	<p><b>Section 3.1 Revegetation objectives and scope</b>                      Revegetation will occur within two specified areas (revegetation areas and landscaping areas in the offset site) as displayed in Figure 1.</p>	During revegetation.	Conformant.	Management advice 5 April 2018. Site inspection 5 April 2018.	Revegetation planting commenced in the area specified in 2016. Landscaping works involving revegetation were completed in July 2017. Community tree planting north of Black Swan Lake was undertaken during this audit period. Infill planting was also undertaken during this audit period.
RMP 2	<p><b>Section 3.1 Revegetation objectives and scope</b>                      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).</p>	Refer to RMP 7.	Conformant.	Management advice 5 April 2018. R_007_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_05042017. R_009_Workpower_2015/16 Seed Collection & Seedling Summary Report Black Swan Lake_00002016. P_005_Strategen_Evidence of planting_IMG_5477. P_006_Strategen_Evidence of planting_IMG_5483. P_007_Strategen_Evidence of planting_IMG_5485.	Peet advised that no seedling planting was undertaken in the "revegetation areas" during this audit period. Only infill planting was undertaken in these areas. RMP 2 was assessed as compliant in the 2016 to 2017 ACR, which identified that revegetation using 6200 breeding and foraging species as defined in the EPBC 2013/7048 approval occurred in 2016 (R_009).

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 3	<p><b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b></p> <ul style="list-style-type: none"> <li>• No greater than 10% weed cover</li> <li>• No Declared Plants or weeds of national environmental significance.</li> </ul>	At completion.	Conformant.	<p>Management advice 5 April 2018.</p> <p>Site inspection 5 April 2018.</p> <p>R_002_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017.</p> <p>R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018.</p>	<p>A high level of weed control was discussed during the site inspection.</p> <p>Some scattered summer weeds were present; however, the overall control was appropriate. Mulch had been spread over the site, which should help suppress weeds in addition to chemical controls that were applied during the audit period.</p> <p>Management advised that pre-planting and post-planting weed control is undertaken.</p> <p>Records (R_002 and R_005) indicate weed control was undertaken throughout this audit period and that quadrats measured identified no more than 10% weed species.</p>
RMP 4	<p><b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b></p> <p>Implement contingency measures as outlined in section 6 if grazing is observed on planted seedlings.</p>	At completion.	Conformant.	<p>Management advice 5 April 2018.</p> <p>Site inspection 5 April 2018.</p> <p>R_002_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017.</p> <p>P_001_Strategen_Evidence of grazing in landscaped areas - 20180405_113641.</p> <p>P_002_Strategen_Evidence of no plant guards - 20180405_113656.</p>	<p>Grazing and other damage to planted seedlings were observed during the site inspection and have also been reported (R_002).</p> <p>Management advised that once they became aware of grazing they installed tree guards to protect the seedlings. During this audit period, some of the tree guards were changed from plastic sleeves to corflute guards for better protection.</p> <p>The revegetation contractor discussed intentions to implement more contingency measures during the next audit period, as outlined in Table 2 of the RMP.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 5	<p><b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b></p> <p>Establish local provenance species as detailed in Table 6 through seedling planting.</p> <p><b>Table 6:</b></p> <p><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></p>	At completion.	Conformant. (completed).	R_009_Workpower_2015/16 Seed Collection & Seedling Summary Report Black Swan Lake_00002016.	<p>Assessment of this item in the 2016/2017 ACR is still applicable to this audit period which identified:</p> <p>Seed collected in 2012-2015, used for the project, was from local provenance (R_009)</p> <p>Eleven species have been collected, with two (<i>Euc. totiana</i> and <i>Calothamnus quadrifidus</i>) not on the Table 6 list – however, these two have not been propagated, only stored for future use, if required.</p>
RMP 6	<p><b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b></p> <p>Ensure management actions as detailed in section 4 are complied with.</p>	Refer to item 17–23.	Not applicable.	Refer to item 17–23.	Refer to item 17–23.
RMP 7	<p><b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b></p> <p>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.</p>	At completion.	Conformant.	Refer to RMP 2.	Refer to RMP 2.
RMP 8	<p><b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b></p> <p>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.</p>	At completion.	Not applicable.	R_007_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_05042017.	<p>Infill planting is being conducted by the revegetation contractor to work towards the 80% survival rate completion criteria.</p> <p>Assessment of this item in the 2016/2017 ACR is still applicable to this audit period which stated:</p> <p>According to the records supplied (R_007), the initial revegetation planting was completed on 30 July 2016, therefore completion criteria not required to be achieved until 30 July 2026.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 9	<p><b>Section 4.1.1 Revegetation areas</b></p> <p>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.</p>	Prior to revegetation activities taking place.	Potentially non-conformant.	<p>R_006_Workpower_NI ASA Accreditation_00002017.</p> <p>R_008_NIASA_Nursery Industry Accreditation Scheme, Australia Workpower Wholesale Nursery_00122016.</p> <p>R_009_Workpower_2015/16 Seed Collection &amp; Seedling Summary Report Black Swan Lake_00002016.</p> <p>R_015_Benara NIASA Accreditation</p> <p>C_004_Strategen_FW Lakelands Tree Planting info for Audit_18042018.</p> <p>R_016 MOTT_HANDBOOK EST.</p>	<p>Assessment of this item in the 2016 to 2017 ACR is still applicable to this audit period which identified:</p> <p>Seed collected in 2012-2015, used for the “revegetation areas” has come from local provenance collected within a 50 km radius of the revegetation site. (R_009).</p> <p>Accreditation certificate of nursery supplied to Workpower (R_006 and R_008).</p> <p>Accreditation certificates of nurseries that supplied LD Total (R_015)</p> <p>However, during the 2017-2018 audit period, community tree planting was undertaken north of Black Swan Lake (also deemed the “revegetation areas”) where Mandurah Baptist College grew the plants (supplied by Men of the Trees Peel branch), which is not NIASA accredited. Thus, the community tree planting area of Black Swan Lake is potentially non-conformant with this item.</p> <p>Men of the Trees do have strict hygiene procedures, such as washing pot frames with bleach and using Richgro soil which area accepted practices in accredited nurseries (R_016), however the auditors have assessed this item as potentially non-conformant as the seedlings were not propagated in an accredited nursery.</p> <p>The auditors recommend the RMP is revised to account for community planting areas and be more reflective of the activities that are occurring on site.</p>
RMP 10	<p><b>Table 3: Management actions (revegetation areas)</b></p> <p>Undertake a site inspection to identify the weed species, locations and abundance within revegetation areas.</p>	Prior to revegetation activities taking place.	Conformant.	R_002_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017.	<p>A site inspection of the revegetation areas was undertaken on 27 September 2017 (R_002), which identified weed species.</p> <p>Management advised that site inspections are undertaken prior to revegetation at least six times a year by their contractor, Workpower.</p>
RMP 11	<p><b>Table 3: Management actions (revegetation areas)</b></p> <p>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.</p>	Prior to seedling planting taking place in accordance with chemical specifications.	Conformant.	<p>R_002_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017</p> <p>R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018</p> <p>Refer to RMP 3.</p>	<p>Current weed control practices have had a positive effect (R_002). However, it is recommended to implement ongoing weed control, as required, to keep weed growth to a minimum.</p> <p>Record (R_005) indicates that Peet’s revegetation contractor, Workpower, undertake regular weed control activities.</p> <p>Refer to RMP 3.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 12	<b>Table 3: Management actions (revegetation areas)</b> Undertake seedling planting as described in Section 4.3.	After the completion of initial weed control.	Conformant.	R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018. Refer to RMP 2.	Infill planting was undertaken west of Black Swan Lake during the audit period.  Refer to RMP 2.
RMP 13	<b>Table 3: Management actions (revegetation areas)</b> 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.	Conformant.	P_004_Strategen_tree guards_20180405_114549.	Tree guards with three stakes have been installed for each seedling in the "revegetation areas". The revegetation contractor advised that in moving forward they intend to install corflute protection for better results against damage caused by fauna.
RMP 14	<b>Table 3: Management actions (revegetation areas)</b> Ensure all plants and other materials used in revegetation are free of dieback and weeds.	Prior to revegetation activities taking place.	Potentially non-conformant.	R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018.	Workpower ensured plants and material were free from dieback and weeds.  Community tree planting was undertaken north of Black Swan Lake (also deemed the "revegetation areas") where Mandurah Baptist College grew the plants (supplied by Men of the Trees Peel branch). Men of the Trees and Mandurah Baptist College were unable to provide evidence that all plants and materials used were free of dieback and weeds.  The auditors recommend the RMP is communicated to all personnel who undertake revegetation activities.
RMP 15	<b>Table 3: Management actions (revegetation areas)</b> Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering revegetation areas.	At all times.	Conformant.	Management advice 5 April 2018. R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018. C_004_Strategen_FW Lakelands Tree Planting info for Audit_18042018.	Weed contractor's pre-start hygiene inspection register provided, indicating hygiene measures have been undertaken. Management advice and C_004 indicated that vehicles are cleaned free of soil before entering all sites.
RMP 16	<b>Section 4.1.2 Landscaping area</b> 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.	Conformant.	Management advice 5 April 2018. D_001_Black Swan Lake - Greenstock Report.	LD Total conducted the revegetation in the "landscaping area" in July 2017 and provided the green stock report of species used (D_001).

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 17	<p><b>Table 4: Management actions (landscaping areas in the offset site)</b></p> <p>Undertake a site inspection to identify the weed species, locations and abundance within the landscaping areas.</p>	Prior to revegetation activities taking place.	Conformant.	<p>Management advice 5 April 2018.</p> <p>Site inspection 5 April 2018.</p> <p>C_004_Strategen_FW Lakelands Tree Planting info for Audit_18042018.</p>	Management advised that revegetation activities in landscaping areas was completed in July 2017. Herbicide application was spot spraying with glyphosate a few weeks prior to planting.
RMP 18	<p><b>Table 4: Management actions (landscaping areas in the offset site)</b></p> <p>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.</p>	Prior to seedling planting taking place in accordance with chemical specifications.	Conformant.	Refer to RMP 17.	Refer to RMP 17.
RMP 19	<p><b>Table 4: Management actions (landscaping areas in the offset site)</b></p> <p>Undertake ongoing maintenance weed control as described in section 4.1.2.</p>	Biannually (as necessary) until responsibility of managing the revegetation site is transferred to City of Mandurah.	Conformant.	Site inspection 5 April 2018.	<p>During the site inspection, the landscaping areas were observed to have minimal weed species. Of the weed species present, it was identified that weed control activities had been undertaken (by Horizon West) as the weeds were observed to be dying.</p> <p>Note: the condition states 'section 4.1.2'. However, it should state 'section 4.2'.</p>
RMP 20	<p><b>Table 4: Management actions (landscaping areas in the offset site)</b></p> <p>Undertake seedling planting as described in Section 4.3.</p>	After the completion of initial weed control.	Conformant.	<p>Refer to RMP 9 for species list.</p> <p>Management advice 5 April 2018.</p> <p>Site inspection 5 April 2018.</p> <p>P_001_Strategen_Evidence of grazing in landscaped areas - 20180405_113641</p> <p>C_004_Strategen_FW Lakelands Tree Planting info for Audit_18042018.</p>	Management advised that seedling planting in "landscaping areas" was completed by LD Total in July 2017.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 21	<p><b>Table 4: Management actions (landscaping areas in the offset site)</b></p> <p>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.</p>	After seedling planting.	Potentially non-conformant.	<p>Management advice 5 April 2018.</p> <p>Site inspection 5 April 2018.</p> <p>P_002_Strategen_Evidence of no plant guards - 20180405_113656.</p> <p>P_003_Strategen_Evidence of no plant guards - 20180405_114112.</p>	<p>At the time of site inspection on 5 April 2018, protective plant guards were not observed in the "landscaping areas". Management advised that it was not common practice to undertake planting in landscaping areas with tree guards. Animal grazing was observed during the site inspection. However, the auditors note the following:</p> <ul style="list-style-type: none"> <li>Landscaping planting methods used by LD Total are in accordance with industry best practice.</li> <li>Tubestock is planted very densely to allow for some plant failures (3 plants/m<sup>2</sup>)</li> <li>Wind loading was minimal as this site is at a natural low point with most planting undertaken around Natural Surface Level +2.00 - +3.00</li> <li>Historical evidence in the area suggests that plants within landscaped areas (with soil preparation) are just as healthy as plants with guards, with no soil preparation.</li> </ul> <p>The auditors recommend revising the RMP and consider the above comments.</p>
RMP 22	<p><b>Table 4: Management actions (landscaping areas in the offset site)</b></p> <p>Ensure all plants and other materials used in revegetation are free of dieback and weeds.</p>	Prior to revegetation activities taking place.	Conformant.	<p>R_015_Benara NIASA Accreditation.</p> <p>R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018.</p>	LD Total planted the "landscaping areas" and have used plants and materials that are free from dieback and weeds.
RMP 23	<p><b>Table 4: Management actions (landscaping areas in the offset site)</b></p> <p>Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering landscaping areas.</p>	At all times.	Potentially non-conformant	<p>Management advice 5 April 2018.</p> <p>C_005_Strategen_FW Lakelands Tree Planting info for Audit_201042018.</p> <p>C_008_LD Total_Lakelands Black Swan Lake Enviro Audit info</p>	<p>LD Total confirmed they conducted weekly washdowns of all vehicles, machinery, and equipment occurred during construction at their construction laydown area however, LD Total did not ensure footwear were free of mud and soil before entering the "landscaping areas".</p> <p>Horizon West did not provide evidence for dieback and clean on entry procedures.</p> <p>Therefore the auditors have assessed this item to be potentially non-conformant.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 24	<p><b>Section 4.2</b></p> <p>Weed control techniques will comprise of chemical controls identified in Table 5</p> <p><b>Table 5:</b></p> <ul style="list-style-type: none"> <li>Initial broad scale spray herbicide application (using towed boom spray rigs)</li> <li>Spot spray herbicide application</li> <li>Stem injection, cut and paint.</li> </ul>	At all times.	Conformant.	<p>Management advice 5 April 2018.</p> <p>Site inspection 5 April 2018.</p> <p>Refer to RMP 3 and RMP 16.</p> <p>C_004_Strategen_FW Lakelands Tree Planting info for Audit_18042018 R_014_Horizon West_Record Sheet - Chemical Spraying_23042018.</p>	<p>Workpower is licensed by the Department of Health to use chemicals and pesticides. Licence was sighted during interview on 5 April 2018.</p> <p>Refer to RMP 3 and RMP 16.</p> <p>Community tree planting areas use spot spray herbicide application with glyphosate (C_004).</p> <p>Weed control is undertaken by Horizon West in the "landscaping areas" (R_014).</p>
RMP 25	<p><b>Section 4.2</b></p> <p>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.</p>	Prior to revegetation activities taking place.	Conformant.	Refer to RMP 3.	Refer to RMP 3.
RMP 26	<p><b>Section 4.2</b></p> <p>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).</p>	After seedling planting.	Conformant.	<p>Management advice 5 April 2018.</p> <p>R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018.</p> <p>Refer to RMP 3.</p>	<p>Management advice on 5 April 2018 confirmed conformance, which was consistent with the pre-start hygiene inspection check (R_005).</p> <p>Refer to RMP 24.</p>
RMP 27	<p><b>Section 4.2</b></p> <p>Weed control will be undertaken by Peet until handover of management to the site to the City of Mandurah.</p>	Until handover of management to the site to the City of Mandurah.	Conformant.	<p>Management advice 5 April 2018.</p> <p>R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018.</p> <p>Refer to RMP 3.</p>	<p>Refer to RMP 24.</p> <p>Weed control has been undertaken by Peet to date. Handover to the City of Mandurah is anticipated to be during the next audit period.</p>
RMP 28	<p><b>Section 4.3</b></p> <p>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.</p>	Refer to RMP 9.	Potentially non-conformant.	Refer to RMP 9 and RMP 16.	Refer to RMP 9.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 29	<b>Section 4.3</b> 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.	Conformant.	Management advice 5 April 2018. R_009_Workpower_2015/16 Seed Collection & Seedling Summary Report Black Swan Lake_00002016.	The species of all the 6200 seedlings planted are as per the defined list.
RMP 30	<b>Section 4.3</b> 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.	Conformant (completed).	R_010_Strategen_Lakelands East Annual Compliance Report_11032016.	This obligation was reported as conformant in the 2015 to 2016 and 2016 to 2017 ACRs (R_010).
RMP 31	<b>Section 4.3</b> 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.	Conformant.	Refer to RMP 2.	Refer to RMP 12.
RMP 32	<b>Section 4.3</b> Seedling planting will be undertaken in early winter, within one month of the first rains.	Early winter, within one month of the first rains.	Conformant.	Management advice 5 April 2018. C_004_Strategen_FW Lakelands Tree Planting info for Audit_18042018.	Bureau of Meteorology records for Mandurah indicates that sporadic rainfall commenced in May 2017, with the remainder of the year also experiencing irregular rainfall. Management advised that during the 2017 to 2018 audit period, infill planting, community planting and landscape planting were undertaken. Management further advised that landscape planting was completed in July 2017. C_004 indicates that trees and irrigated shrubs to the POS areas were installed 30 June 2017 and non-irrigated tubestock planting was installed 30 August 2017.
RMP 33	<b>Section 4.3</b> 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.	Conformant.	R_002_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017. Refer to items 47, 48 and 51 – 57.	Revegetation monitoring was undertaken on 27 September 2017, which identified that the number of breeding and foraging species per hectare is above the target density. Refer to items 47, 48 and 51 – 57.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 34	<p><b>Section 4.3</b></p> <p>Seedlings (in the form of Tubestock) used for planting should be suitably mature, between 6 to 12 months to enable optimal establishment and growth.</p>	During revegetation.	Conformant.	<p>R_009_Workpower_2015/16 Seed Collection &amp; Seedling Summary Report Black Swan Lake_00002016.</p> <p>R_010_Strategen_Lakelands East Annual Compliance Report_11032016.</p> <p>Site inspection 22 March 2017.</p> <p>C_004_Strategen_FW Lakelands Tree Planting info for Audit_18042018.</p> <p>C_007_Strategen_FW Community Planting at Black Swan Lake_27042018.</p> <p>D_002_Black Swan Lake Audit - Age of tubestock.</p>	<p>Seedlings used to infill in the “revegetation areas” by the revegetation contractor were from an accredited nursery and will be suitably mature to ensure optimal growth (R_009).</p> <p>LD Total planted seedlings in the “landscaping areas” that were less than 6 months old, however, since these seedlings were from accredited nurseries it was deemed that the seedlings were likely to be suitably mature (D_002).</p> <p>Community tree planting was undertaken during the audit period, north of Black Swan Lake, by Mandurah Baptist College. Seedlings were supplied by Men of the Trees Peel branch and have been confirmed to be growing for between 6 to 12 months prior to planting (C_007).</p>
RMP 35	<p><b>Section 4.3</b></p> <p>Tubestock should also not be root bound and planting should be undertaken as follows:</p> <ul style="list-style-type: none"> <li>• 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)</li> <li>• seedling should be planted so that the stem is vertical and the base of the plant is slightly below the original soil surface</li> <li>• soil surrounding the seedling root ball should be pressed in firmly to avoid air pockets</li> <li>• 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.</li> </ul>	During revegetation.	Conformant.	Refer to RMP 34.	Refer to RMP 34.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 36	<b>Section 4.3</b> 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.	Conformant.	Site inspection 5 April 2018. Management advice 5 April 2018. R_001_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017	During site inspection on 5 April 2018 plant stress was observed. Revegetation monitoring was undertaken on 27 September 2017, which identified that 20% of seedlings planted showed evidence of grazing and pests, and/or water stress. Many eucalypts appeared to have fungal infections, although these are typically not fatal. Water stress appears to have impacted some seedlings, particularly <i>Acacia saligna</i> and the <i>Banksia</i> species. Management advised that they are investigating hydrophobic options.
RMP 37	<b>Section 4.3</b> 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.	Conformant.	Site inspection 5 April 2018. Management advice 5 April 2018. R_001_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017 Refer to items 47, 48	Management advised that infill planting, landscaping planting, community tree planting and weed control were undertaken during this audit period. Revegetation monitoring was undertaken on 27 September 2017, which made the following recommendations: <ul style="list-style-type: none"> <li>• infill planting should be undertaken in 2018 to achieve a better representation of foraging species across the quadrats. The infill planting should concentrate on, but not be limited to, foraging species and these should be planted predominantly in the southern section of the revegetation site. Potential breeding species should also be planted to increase species diversity</li> <li>• implement ongoing weed control as required.</li> </ul>
RMP 38	<b>Section 4.4</b> Tree guards are to be installed around planted seedlings which will provide protection from browsing animals.	Refer to item 35.	Potentially non-conformant.	Site inspection 5 April 2018. Management advice 5 April 2018. R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018. P_004_Strategen_tree guards_20180405_114549.	Tree guards have been installed and observed during site inspection (P_004) in all revegetation areas except the "landscaping areas". Plants in the landscaping area were observed to be affected by grazing animals.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 39	<p><b>Section 4.5 Hygiene measures</b></p> <p>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.</p>	Prior to revegetation activities taking place.	Potentially non-conformant.	<p>Management advice 5 April 2018.</p> <p>R_006_Workpower_NIASA Accreditation_00002017.</p> <p>R_015_Benara NIASA Accreditation.</p>	<p>Seedlings used by Workpower were grown at an accredited nursery (R_006).</p> <p>Seedlings used by LD Total were grown at an accredited nursery (R_006 and R_015).</p> <p>However, during the 2017-2018 audit period, community tree planting was undertaken north of Black Swan Lake (also deemed the "revegetation areas") where Mandurah Baptist College grew the plants (supplied by Men of the Trees Peel branch), which is not NIASA accredited.</p>
RMP 40	<p><b>Section 4.5 Hygiene measures</b></p> <p>Vehicles, machinery, equipment and footwear will also be free of mud and soil when entering the offset site.</p>	During revegetation.	Potentially non-conformant.	<p>R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018.</p> <p>C_004_Strategen_FW Lakelands Tree Planting info for Audit_18042018.</p> <p>C_006_Tranen_Dieback Hygiene Management_26042018.</p> <p>C_008_LD Total_Lakelands Black Swan Lake Enviro Audit info</p>	<p>Workpower maintains a hygiene register (R_005).</p> <p>LD Total confirmed they conducted weekly washdowns of all vehicles, machinery, and equipment occurred during construction at their construction laydown area however, LD Total did not ensure footwear were free of mud and soil before entering the "landscaping areas" (C_008).</p> <p>Horizon West did not provide evidence for dieback and clean on entry procedures.</p> <p>Therefore the auditors have assessed this item to be potentially non-conformant.</p> <p>All Tranen vehicles are cleaned free of soil before entering all sites (community tree planting area) (C_004).</p> <p>Tranen advised that cleanliness is part of their normal operating procedure (C-006) and that Phytoclean diluted in accordance with the instructions is used to clean down tools and equipment. In this case the planting equipment are hand shovels. These are not used during routine planting operations, only for school planting days (C_005).</p>
RMP 41	<p><b>Section 4.7 Conservation mechanism</b></p> <p>A conservation covenant under one of the following legislative mechanisms will be applied over the offset site by 30 June 2019:</p> <ul style="list-style-type: none"> <li>• Transfer of Land Act 1893</li> <li>• Soil and Land Conservation Act 1945</li> <li>• National Trust of Australia (WA) Act 1964.</li> </ul>	By 30 June 2019.	Not applicable.	<p>C_001_Strategen_Letter to DEE informing of updates to the RMP_00002017.</p> <p>C_002_Strategen_DEE approval of updates to the RMP_10102017.</p> <p>R_001_Strategen_Black Swan Swamp Revegetation Management Plan_22092017.</p>	The requirement to meet RMP 41 has been extended from 31 January 2017 to 30 June 2019, therefore not applicable during this audit period.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 42	<p><b>Section 5.1.1 Revegetation areas</b></p> <p>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.</p>	Every three years.	Conformant	R_001_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017.	Revegetation monitoring was undertaken on 27 September 2017 in accordance with RMP 42. Monitoring is performed annually.
RMP 43	<p><b>Section 5.1.1 Revegetation areas</b></p> <p>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).</p>	Every three years.	Conformant.	Refer to RMP 42.	Refer to RMP 42.
RMP 44	<p><b>Section 5.1.1 Revegetation areas</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>• flora species composition</li> <li>• vegetation structure</li> <li>• density of flora species.</li> </ul> <p>Numbers of trees will be recorded from the entire 10 m by 10 m monitoring plot to obtain an appropriate representative sample.</p>	Every three years.	Conformant.	Refer to RMP 42.	Refer to RMP 42.
RMP 45	<p><b>Section 5.1.1 Revegetation areas</b></p> <p>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).</p>	Every three years.	Conformant.	Refer to RMP 42.	Monitoring was undertaken in the “revegetation areas”, ahead of schedule, on 27 September 2017. Refer to RMP 42.
RMP 46	<p><b>Section 5.1.2 Landscaping areas</b></p> <p>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:</p> <ul style="list-style-type: none"> <li>• plant stress</li> <li>• plant mortality</li> <li>• weed species.</li> </ul>	Every three years.	Not applicable.	Refer to RMP 16 and RMP 42.	Revegetation activities in landscaping areas was completed in July 2017. Monitoring is not required until Spring 2019.
RMP 47	<p><b>Table 9: Monitoring program for revegetation and landscaping areas within the offset site</b></p> <p>Opportunistic observation during monitoring:</p> <p>a. Plant health (i.e. evidence of water stress, pests, animal grazing).</p>	3 yearly.	Conformant.	Refer to RMP 42.	Refer to RMP 42.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 48	<p><b>Table 9: Monitoring program for revegetation and landscaping areas within the offset site</b></p> <p>Monitoring of quadrats.</p> <p>a. Plant density</p> <p>b. Species richness</p> <p>c. Plant health (i.e. evidence of water stress, pests, animal grazing).</p>	3 yearly.	Conformant.	Refer to RMP 42.	Refer to RMP 42.
RMP 49	<p><b>Table 9: Monitoring program for revegetation and landscaping areas within the offset site</b></p> <p>Observation during monitoring.</p> <p>a. Weed species.</p>	Annually until handover to the CoM.	Conformant.	<p>Management advice 5 April 2018.</p> <p>R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018.</p> <p>Refer to RMP 42.</p>	<p>Workpower undertook monitoring across the whole RMP area at least 6 times during the audit period and conduct weed control in the "revegetation areas" (R_005).</p> <p>Horizon West undertook weed control in the "landscaping areas".</p>
RMP 50	<p><b>Section 6: Contingency measures</b></p> <p>Contingency actions will be initiated if monitoring indicates that management actions detailed for revegetation areas (Table 3) and landscaping areas within the offset site (Figure 3) have not been successful or effective and/or completion criteria are not being achieved (Table 10).</p>	Every three years.	Not applicable.	<p>Management advice 5 April 2018.</p> <p>R_002_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017.</p> <p>Refer to RMP 42 and RMP 46.</p>	<p>Management advised that contingency actions were due to be initiated in 2019 but due to unsuccessful results in revegetation areas, this action has been brought forward. The revegetation contractor is investigating hydrophobic options and implementing recommendations made in the annual revegetation monitoring spring 2017 report (R_002).</p> <p>Monitoring program for "landscaping areas" is yet to be established.</p>
RMP 51	<p><b>Section 6: Contingency measures</b></p> <p>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.</p>	As required.	Not applicable.	<p>Management advice 5 April 2018.</p> <p>Refer to RMP 8, RMP 42 and RMP 46.</p>	<p>Revegetation contractor advised that they are investigating hydrophobic options but are yet to be implemented.</p> <p>Refer to RMP 8, RMP 16, RMP 42 and RMP 46.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 52	<p>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.</p> <p>i. Identify cause.</p> <p>ii. Implement approach to remedy cause which could include:</p> <ul style="list-style-type: none"> <li>• collecting additional provenance seed for plant propagation to compensate for the insufficient native plant species richness and/or cover</li> <li>• undertaking infill seedling planting within 12 months of the date of survey</li> <li>• application of additives such as Seasol, water granules, soil breaker, water retainer, wetting agent or fertiliser tablets as deemed necessary by revegetation contractor.</li> <li>• further weed and/or pest control if required post infill planting.</li> </ul> <p>iii. Monitor success of contingency measure(s).</p>	As required.	Conformant.	<p>Management advice 5 April 2018.</p> <p>R_001_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017.</p> <p>Refer to RMP 42 and RMP 46.</p>	<p>Revegetation monitoring was undertaken on 27 September 2017, which made the following recommendations:</p> <ul style="list-style-type: none"> <li>• infill planting should be undertaken in 2018 to achieve a better representation of foraging species across the quadrats. The infill planting should concentrate on, but not be limited to, foraging species and these should be planted predominantly in the southern section of the revegetation site. Potential breeding species should also be planted to increase species diversity</li> <li>• implement ongoing weed control as required</li> </ul> <p>Peet advised that they are applying the recommendations as well as investigation hydrophobic options.</p> <p>Refer to RMP 42 and RMP 46.</p>
RMP 53	<p>Approximately 20% of seedlings planted show evidence of damage by animal (i.e. grazing).</p> <p>i. Implement measures to prevent further damage which could include:</p> <ul style="list-style-type: none"> <li>• animal control program</li> <li>• installation of temporary fencing</li> <li>• application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required</li> <li>• applying wetting agent or supplementary watering</li> <li>• removing damaged plants and replanting</li> <li>• providing alternate species suitable to the site and provenance requirements.</li> </ul> <p>2. Monitor success of contingency measure(s).</p>	As required.	Conformant.	<p>Management advice 5 April 2018.</p> <p>Refer to RMP 42, RMP 46 and RMP 52.</p>	<p>Workpower is licensed by the Department of Health to use chemicals and pesticides. Licence was sighted during interview on 5 April 2018.</p> <p>Monitoring and infill planting is undertaken annually.</p> <p>Refer to RMP 42, RMP 46 and RMP 52.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 54	<p>Approximately 20% of seedlings planted show evidence of damage by pests.</p> <p>i. Implement measures to prevent further damage which could include:</p> <ul style="list-style-type: none"> <li>• animal control program</li> <li>• installation of temporary fencing</li> <li>• application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required</li> <li>• applying wetting agent or supplementary watering</li> <li>• removing damaged plants and replanting</li> <li>• providing alternate species suitable to the site and provenance requirements.</li> </ul> <p>ii. Monitor success of contingency measure(s).</p>	As required.	Conformant.	<p>Management advice 5 April 2018.</p> <p>R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018.</p> <p>Refer to RMP 42, RMP 46 and RMP 52.</p>	<p>Management advised that tree guards are installed and weed control activities are undertaken in the offset site as contingency measures.</p> <p>Workpower is licensed by the Department of Health to use chemicals and pesticides. Licence was sighted during interview on 5 April 2018.</p> <p>Refer to RMP 42, RMP 46 and RMP 52.</p>
RMP 55	<p>Approximately 20% of seedlings planted show evidence of water stress.</p> <p>i. Implement measures to prevent further damage which could include:</p> <ul style="list-style-type: none"> <li>• animal control program</li> <li>• installation of temporary fencing</li> <li>• application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required</li> <li>• applying wetting agent or supplementary watering</li> <li>• removing damaged plants and replanting</li> <li>• providing alternate species suitable to the site and provenance requirements.</li> </ul> <p>ii. Monitor success of contingency measure(s).</p>	As required.	Conformant.	<p>Management advice 5 April 2018.</p> <p>Refer to RMP 42, RMP 46 and RMP 52.</p>	<p>Management advised that they are investigating hydrophobic options but are yet to be implemented.</p> <p>Refer to RMP 42, RMP 46 and RMP 52.</p>
RMP 56	<ul style="list-style-type: none"> <li>• No greater than 10% weed cover</li> <li>• No Declared Plants or weeds of national environmental significance</li> </ul>	As required.	Conformant.	<p>R_001_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017.</p> <p>R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018.</p>	<p>Revegetation monitoring was undertaken on 27 September 2017, which stated that all quadrats had less than 10% weed cover, and no declared plants or weeds of national significance were recorded. However, weed cover is likely to increase unless weed control continues to be implemented.</p> <p>Weed control is continuing to be implemented (R_005).</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 57	<p>Unauthorised access (people and vehicles).</p> <p>i. Implement measures to prevent further unauthorised access (e.g. installation of temporary fencing and signage), as practicable.</p> <p>ii. Monitor success of contingency measure(s).</p>	As required.	Conformant.	Management advice 5 April 2018.	Management advised that there is unauthorised access (public, motorbikes etc.) and that it is impractical to implement prevention measures. Management further advised that unauthorised access is not causing any problems.
RMP 58	<p><b>Section 7 Plan implementation</b></p> <p>This RMP will be implemented by Peet until responsibility of the revegetation site is transferred to the City of Mandurah (CoM).</p>	Until responsibility of the revegetation site is transferred to the City of Mandurah.	Conformant.	Management advice 5 April 2018.	Peet remains responsible for the revegetation areas to date.
RMP 59	<p><b>Section 7 Plan implementation</b></p> <p>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>.</p>	At handover.	Not applicable.	Refer RMP 58.	Refer RMP 58.
RMP 60	<p><b>Section 7.1 Roles and responsibilities</b></p> <p>All contractors and staff will be required to operate in accordance with this RMP.</p>	At all times.	Conformant.	Management advice 5 April 2018.	Management advised that all contractors and staff operate in accordance with this RMP. Contractors - Work Power, Horizon West and LD Total.



**Appendix 2**  
**Evidence register**



Code	Reference	Author/ Organisati on	Versi on	Topic /notes	File name
C_001	C_001_Strategen_ Letter to DEE informing of updates to the RMP_00002017	Strategen	Rev 1	Letter to DEE informing of updates to the RMP	PEE13082_01 L0016 Rev 1
C_002	C_002_Strategen_DEE approval of updates to the RMP_10102017	DEE		Email from DEE approving the updates to the RMP	RE Lot 9099 Mandjoogoordap Drive Lakelands Revegetation Management Plan SEC UNCLASSIFIED
C_003	C_003_Strategen_Peet Lakelands East ACR_17042018	Strategen		2015 - 2016 ACR on website	C_003 RE Peet Lakelands East ACR
C_004	C_004_Strategen_FW Lakelands Tree Planting info for Audit_18042018	Strategen		Community tree planting	C_004_Strategen_FW Lakelands Tree Planting info for Audit_18042018
C_005	C_005_Strategen_FW Lakelands Tree Planting info for Audit_201042018	Strategen		Lakelands Tree Planting info	C_005_Strategen_FW Lakelands Tree Planting info for Audit_201042018
C_006	C_006_Tranen_Dieback Hygiene Management_26042018	Tranen		Dieback Hygiene Management	C_006_Tranen_Dieback Hygiene Management_26042018
C_007	C_007_Strategen_FW Community Planting at Black Swan Lake_27042018	Strategen		Community Planting at Black Swan Lake	C_007_Strategen_FW Community Planting at Black Swan Lake_27042018
C_008	C_008_LD Total_Lakelands Black Swan Lake Enviro Audit info	LD Total		LD Total planting techniques	C_008_LD Total_Lakelands Black Swan Lake Enviro Audit info
G_001	G_001_Peet_Website ACR_01052017	Peet		ACR on website	Peet website_ACR - 01052017
W_001	W_002_Strategen_ACR and RMP on website_06042018	Strategen		ACR and RMP on website	W_001_Strategen_ACR and RMP on website_06042018
R_001	R_001_Strategen_Black Swan Swamp Revegetation Management Plan_22092017	Strategen	Rev 6	Black Swan Swamp Revegetation Management Plan	PEE13082_01 R005 Rev 6
R_002	R_001_Strategen_Black Swan Swamp annual revegetation monitoring spring 2017_09102017	Strategen	Rev A	Black Swan Swamp Annual Revegetation Monitoring Spring 2017	PEE13082_01 M014 Rev A
R_003	R_003_Strategen_Mandjoogoordap Drive Revegetation Site Walkover_09102017	Strategen	Rev A	Mandjoogoordap Drive Revegetation Site Walkover	PEE13082_01 M015 Rev A
R_004	R_004_Strategen_Lakelands East Annual Compliance Report_01052017	Strategen	Rev 0	Annual Compliance Report	PEE13082_01 R009 Rev 0
R_005	R_005_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_23012018	Workpower		Pre-start hygiene inspection check	HygieneRegister23Jan18
R_006	R_006_Workpower_NIASA Accreditation_00002017	Workpower		NIASA Accreditation	Workpower NIASA Accreditation

Code	Reference	Author/ Organisati on	Versi on	Topic /notes	File name
R_007	R_007_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_05042017	Workpow er		pre-start hygiene inspection check	PrestartHygieneInspection
R_008	R_008_NIASA_Nursery Industry Accreditation Scheme, Australia Workpower Wholesale Nursery_00122016	NIASA		NIASA accreditation Workpower Wholesale nursery	NIASA certificate Dec 2016_workpower wholesale nursery
R_009	R_009_Workpower_2015/1 6 Seed Collection & Seedling Summary Report Black Swan Lake_00002016	Workpow er		Seed Collection & Seedling Summary Report Black Swan Lake	SummaryReport
R_010	R_010_Strategen_Lakeland s East Annual Compliance Report_11032016	Strategen	Rev 0	Annual Compliance Report 2016	PEE13082_01 R008 Rev 0
R_011	R_011_MNG_Lakelands East Extent of Cleared Areas_04072016	MNG		Extent of cleared areas 30 June 2016 (start of CBC breeding season)	95635de-094d
R_012	R_012_Strategen_Lakeland s East - Mandjoogoordap Drive, Mandurah Significant Tree Survey Results_02082016	Strategen		Significant Tree Survey	PEE13082_01 M012 Rev A
R_013	R_013_Strategen_Feb2017 _24042107	Strategen		Clearing areas - start of audit period	PEE13082_01_JMitchelle_Feb2017_ 20170424
R_014	R_014_Horizon West_Record Sheet - Chemical Spraying_23042018	Horizon West		Horizon West_Record Sheet - Chemical Spraying	R_014_Horizon West_Record Sheet - Chemical Spraying_23042018
R_015	R_015_Benara NIASA Accreditation	Benara Nursery		Accreditation	R_015_Benara NIASA Accreditation
R_016	R_016 MOTT_HANDBOOK EST	Men of the Trees		Handbook	R_016 MOTT_HANDBOOK EST
P_001	P_001_Strategen_Evidence of grazing in landscaped areas_20180405_113641	Strategen		Strategen_Evi dence of grazing in landscaped areas	P_001_Strategen_Evidence of grazing in landscaped areas_20180405_113641
P_002	P_002_Strategen_Evidence of no plant guards - 20180405_113656	Strategen		Evidence of no plant guards	P_002_Strategen_Evidence of no plant guards - 20180405_113656
P_003	P_003_Strategen_Evidence of no plant guards - 20180405_114112	Strategen		Evidence of no plant guards	P_003_Strategen_Evidence of no plant guards - 20180405_114112
P_004	P_004_Strategen_tree guards_20180405_114549	Strategen		tree guards	P_004_Strategen_tree guards_20180405_114549
P_005	P_005_Strategen_Evidence of planting_IMG_5477	Strategen		Evidence of planting	P_005_Strategen_Evidence of planting_IMG_5477

Code	Reference	Author/ Organisati on	Versi on	Topic /notes	File name
P_006	P_006_Strategen_Evidence of planting_IMG_5483	Strategen		Evidence of planting	P_006_Strategen_Evidence of planting_IMG_5483
P_007	P_007_Strategen_Evidence of planting_IMG_5485	Strategen		Evidence of planting	P_007_Strategen_Evidence of planting_IMG_5485
D_001	D_001_Black Swan Lake - Greenstock Report	LD Total		Greenstock report	D_001_Black Swan Lake - Greenstock Report
D_002	D_002_Black Swan Lake Audit - Age of tubestock	LD Total		Age of tubestock	D_002_Black Swan Lake Audit - Age of tubestock