

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

31 March 2020

57970-127041 (Rev 0)

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

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) Harry Doyle

Position (please print) Assistant Development Manager

Organisation (please print including ABN/ACN if applicable) PEET MANDURAH SYNDICATE

Date 31/03/2020

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- 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, 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 Mandjoogordap 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 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 2019 to 2 February 2020) included:

- Stage 68 was cleared and constructed
- clearing was undertaken in parts of Stage 67 POS and Triangle Park
- two rounds of weed control undertaken within the revegetation and landscaping areas during Winter and Spring 2019
- annual monitoring of revegetation areas undertaken in October 2019.

No infill planting was undertaken in the revegetation or landscaping areas during the audit period 3 February 2019 to 2 February 2020.

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 2019 and 3 February 2020 for the conditions of EPBC 2013/7048 and implementation of the RMP (Revision 6, Strategen 2017) required by conditions 3 and 4 of EPBC 2013/7048.

3.1.2 Methodology

The audit was undertaken during February and March 2020 by Environmental Auditors from Strategen-JBS&G, Karen Hoefhamer and Rebecca Mason. A site inspection was carried out on 3 February 2020. An interview was held with Harry Doyle, PEET Assistant development Manager, on 3 February 2020. 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 audit

| Person and position | Organisation | Purpose |
|---|-----------------|--|
| Harry Doyle – 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. |
| William Oversby– Consultant | Strategen-JBS&G | To escort auditors on behalf of PEET during the site inspection to observe areas where key activities were undertaken during the audit period; and to provide auditors with follow up evidence as required on behalf of PEET |
| Carli O’Brien– Senior Consultant | Strategen-JBS&G | To provide auditors with follow up evidence as required on behalf of PEET |

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 and associated management plans. The DAWE has issued ACR Guidelines. Terminology from this guidance was applied in this audit (Table 3.2).

Table 3.2: Action implementation status

| Status | Acronym | Description |
|-------------------------------|---------|---|
| Conditions of approval | | |
| 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. |
| Management Plans | | |
| 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 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 conditions

Of 28 sub-conditions of EPBC 2013/7048:

- 25 were found to be 'Compliant', with three of those 'Compliant (completed)',
- three were found to be 'Not applicable',
- None were found to be potentially non-compliant.

4.2 Conformance with the Revegetation Management Plan

Of the 60 key actions identified from the RMP:

- 45 were found to be 'Conformant', of which one was identified as 'Conformant (completed)',
- 10 were found to be 'Not applicable',
- five were found to be 'Potentially non-Conformant'.

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

- RMP 3 regarding >10% weed cover in quadrats 1 and 2 and the identification of a declared weed - *Gomphocarpus fruticosus* (Narrowleaf Cottonbush) in quadrat 2 during the annual monitoring survey within the revegetation area;
- RMP 23, 40 and 60 relating to hygiene measures, where contractors for the landscaping areas had not documented whether they implement hygiene measures prior to entering these areas; and
- RMP 41 regarding a conservation covenant not being applied over the offset site by 30 June 2019.

The auditors determined these potential non-conformances are minor and have either minimal or no environmental impact. It is recommended that correct hygiene measures are implemented and documented for contractors within the landscaping area.

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 3 February 2020 | Management confirmed that no black cockatoo habitat trees outside of the project area were cleared during this audit period. | 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. | C002_Strategen-JBS&G_Lakelands tree retention calculations_120202020 D001_Strategen-JBS&G_Lakelands trees to be retained_Feb 2020 | The Lakelands significant tree survey data as at 12 February 2020 showed that 338 trees have been identified for retention, with 187 identified as foraging species and 151 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. | R_002_strategen-JBS&G_Lakelands RMP Rev 6_092017 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. | C (complete) |
| 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). | C (complete) |
| EPBC 3.3 | The RMP must include, but may not be limited to: <ul style="list-style-type: none"> 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 | R_002_strategen-JBS&G_Lakelands RMP Rev 6_092017 | The approved RMP Rev 6 (R_002) includes the required details | C |

| Condition Number | Condition | Evidence | Comments | Compliance status |
|------------------|--|---|--|-------------------|
| | <p>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> | | | |
| EPBC 4.1 | If the Minister approves the RMP, then the approval holder must implement the approved RMP. | Refer to Appendix B | <p>The RMP has been implemented across the Project during the period. Refer to Appendix B for further information</p> <p>Of 60 key actions identified from the RMP:</p> <ul style="list-style-type: none"> • five were found to be 'Potentially non-Conformant.' • 45 were found to be 'Conformant', of which 2 were identified as 'Conformant (completed)'. • 10 were found to be 'Not applicable' | C |
| 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. If any black cockatoos are detected using a hollow in a tree or trees, the approval holder must:</p> <ol style="list-style-type: none"> 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 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 | C004_Clearing during breeding season_20022020 | Management confirmed that no clearing, including that of habitat trees took place during the black cockatoo breeding season (July to November) within this audit period. | C |

| Condition Number | Condition | Evidence | Comments | Compliance status |
|------------------|---|---|--|-------------------|
| | 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. | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 | This obligation has been previously assessed as Compliant. | C (complete) |
| 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. | This audit report substantiates that this condition has been complied with | 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. | W_001_Peet_Website 2019 ACR_100202020 C008_DEE correspondence EPBC Act Approval 20137048 2019 ACR_03052019 | The ACR was prepared and published on Peet's website on 3 May 2019, 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. | C008_DEE correspondence EPBC Act Approval 20137048 2019 ACR_03052019 | Documentary evidence detailing the date of publication of the 2019 ACR on Peet's website was provided to DAWE on 3 May 2019. | C |
| EPBC 8.3 | The compliance reports must remain on the website for the life of the approval. | W_001_Peet_Website 2019 ACR_100202020 W_002_Peet_Website 2019 ACR_100202020 | The ACR for the audit periods 2016-2017, 2017-2018 and 2018-2019 were available online on 10 February 2020. The ACR for the audit period 2015 – 2016 was available on the Peet website, however was available under the 'Lakelands East Revegetation Management Plan' title when accessed on 10 February 2020. Recommendation: The correct link for Lakelands ACR 2016 should be updated on the PEET website | C |

| Condition Number | Condition | Evidence | Comments | Compliance status |
|------------------|---|--|---|-------------------|
| EPBC 8.4 | All contraventions must also be included in the compliance reports. | W_001_Peet_Website 2019 ACR_100202020 W_002_Peet_Website 2019 ACR_100202020 | 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 | 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 3 February 2020 | Management advised that there were no requests from the public for copies of the compliance reports during the audit period. | 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 3 February 2020 | 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 3 February 2020 | Management advised that they had not received any such direction from the Minister to conduct an independent audit during the audit period. | NA |
| 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 | NA |
| 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 | NA |
| 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. | R_002_strategen-JBS&G_Lakelands RMP Rev 6_092017 Management advice 17 February 2020 | No changes were made to the RMP (Rev 6) during the reporting period. | C |
| EPBC 11.2 | If the approval holder makes this choice it must: | Refer to EPBC 11.1 | Refer to EPBC 11.1 | C |

| Condition Number | Condition | Evidence | Comments | Compliance status |
|------------------|--|--------------------|--------------------|-------------------|
| | <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. | | | |
| 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 | C |
| 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 | C |
| 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> <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. <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> | Refer to EPBC 11.1 | Refer to EPBC 11.1 | C |
| 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 | Refer to EPBC 11.1 | Refer to EPBC 11.1 | C |

| Condition Number | Condition | Evidence | Comments | Compliance status |
|------------------|---|---|---|-------------------|
| | allows the approval holder to submit a revised RMP to the Minister for approval. | | | |
| 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 on 3 February 2020 | Management advised that no requests were received from the Minister during the audit period. | 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. | R_002_strategen-JBS&G_Lakelands RMP Rev 6_092017 | Revision 6 of the RMP was implemented during this audit period. | C |
| EPBC 13.1 | Unless otherwise agreed to in writing by the Minister, the approval holder must publish the revised RMP on its website. | W_001_Peet_Website 2019 ACR_100202020 | Revision 6 of the RMP on the PEET website was accessed online by the auditors on 10 February 2020 | 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. | Management advice on 3 and 17 February 2020 W_001_Peet_Website 2019 ACR_100202020 | Management advised that there were no further revisions to the current approved RMP (Revision 6) during this audit period. Refer to RMP 41 for further details (Appendix B). | C |

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2. 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.

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3. References

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

Strategen 2017, *Lakelands East: Lot 9099 Mandjoogoordap Drive, Mandurah, Black Swan Swamp Revegetation Management Plan*, revision 6, report prepared for Peet Limited by Strategen, September 2017.

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



Australian Government
Department of the Environment

Approval

'Lakelands East' Residential Development, Mandurah, WA (EPBC 2013/7048)

This decision is made under sections 130(1) and 133 of the *Environment Protection and Biodiversity Conservation Act 1999*.

Proposed action

person to whom the approval is granted Peet Mandurah Syndicate Limited

proponent's ACN 062 315 673

proposed action To clear native vegetation to undertake the 'Lakelands East' residential development at Lot 9099 Mandjoogoordap Drive, Mandurah, Western Australia [See EPBC Act referral 2013/7048].

Approval decision

| Controlling Provision | Decision |
|---|----------|
| Listed threatened species and communities (sections 18 & 18A) | Approved |

conditions of approval

This approval is subject to the conditions specified below.

expiry date of approval

This approval has effect until 31 December 2028

Decision-maker

name and position Dr Simon Banks
Assistant Secretary
Environment Assessment Branch

signature

date of decision 03 December 2014



VARIATION TO CONDITIONS ATTACHED TO APPROVAL

'Lakelands East' Residential Development, Mandurah, WA (EPBC 2013/7048)

This decision to vary a condition of approval is made under section 143 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Approved action

Person to whom the approval is granted

Peet Mandurah Syndicate Limited

ACN: 062 315 673

Approved action

To clear native vegetation to undertake the 'Lakelands East' residential development at Lot 9099 Mandjoogordap Drive, Mandurah, Western Australia [See EPBC Act referral 2013/7048].

Variation

Variation of conditions of approval

The variation is:
Delete conditions 11 and 13 attached to the approval dated 3 December 2014 and substitute with the conditions specified below.

Delete the definition of 'Department' attached to the approval dated 3 December 2014 and substitute with the condition specified below.

Add the definition of 'new or increased impact' specified below.

Note: All other conditions including the definitions in the approval dated 3 December 2014 remain unchanged.

Date of effect

This variation has effect on the date the instrument is signed.

Person authorised to make decision

Name and position

Shane Gaddes
Assistant Secretary
Compliance & Enforcement Branch

Signature

Date of decision

9 May 2016

Condition attached to the approval

11. 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**. 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**.
- 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.
- 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**.
- 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:
- 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.
- 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.
13. Unless otherwise agreed to in writing by the **Minister**, the approval holder must publish the revised RMP on its website. 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.

Definitions

Department is the Australian Government Department or any other agency administering the Environment Protection and Biodiversity Conservation Act 1999 (Cth) from time to time.

New or increased impact is a new or increased impact on any matter protected by the controlling provisions for the action, when compared to the plan, program or strategy that has been approved by the **Minister**.

Conditions attached to the approval

1. The **approval holder** must not **clear** any **black cockatoo habitat trees** outside of the **project area**.
2. 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**.
3. 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**. The **approval holder** must not **commence** the action unless the **Minister** has approved the RMP. 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**.
4. If the **Minister** approves the RMP, then the **approval holder** must implement the approved RMP.
5. 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:

1. clearly identify all such trees with fencing and signage that must be located within two (2) metres of the base of each such tree;

2. not clear any such tree or any vegetation within 10 metres of any such tree; and
3. 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 being used by **black cockatoos**.

6. Within 30 days after the **commencement** of the action, the **approval holder** must advise the **Department** in writing of the actual date of **commencement**.
7. 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.
8. 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 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.
9. 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
10. 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**. The independent auditor must be approved by the **Minister** prior to the commencement of the audit. Audit criteria must be agreed to by the **Minister** and the audit report must address the criteria to the satisfaction of the **Minister**.
11. If the **approval holder** wishes to carry out any activity otherwise than in accordance with the RMP, as specified in the conditions, the **approval holder** must submit to the **Department** for the **Minister's** written approval, a revised version of the RMP. The varied activity must not **commence** until the **Minister** has approved the varied RMP in writing. The **Minister** will not approve a varied RMP, unless the revised RMP would result in an equivalent or improved environmental outcome over time. If the **Minister** approves the revised RMP, that RMP must be implemented in place of the RMP previously approved.
12. 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. 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.

13. Unless otherwise agreed to in writing by the **Minister**, the **approval holder** must publish the RMP referred to in these conditions of approval on their website. The RMP must be published on that website within 1 month of being approved and remain published for the life of the approval.

Definitions

approval holder is the person to whom the approval is granted, or to whom the approval is transferred under section 145B of the *Environment Protection and Biodiversity Conservation Act 1999*.

Baudin's Black-Cockatoo is the black cockatoo species *Calyptorhynchus baudinii*.

black cockatoo habitat trees are all tree and shrub species that provide foraging, roosting and/or breeding habitat for **black cockatoos**, including standing dead stags, Tuart (*Eucalyptus gomphocephala*), Marri (*Corymbia calophylla*), Jarrah (*Eucalyptus marginata*), *Acacia saligna*, *Banksia attenuata*, *Banksia grandis*, *Banksia menziesii* and *Allocasuarina fraseriana* species.

black cockatoo or cockatoos includes the **Baudin's Black-Cockatoo**, **Carnaby's Black-Cockatoo** and **Forest Red-tailed Black-Cockatoo**.

Carnaby's Black-Cockatoo is the black cockatoo species *Calyptorhynchus latirostris*.

clear or **clearing** includes the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ring-barking, uprooting or burning of native vegetation.

commence, **commenced** or **commencement** includes any preparatory works required to be undertaken including clearing (as defined above), the erection of any fences, signage or on-site temporary structures and the use of construction or excavation equipment on-site for the purpose of breaking the ground for buildings, infrastructure or resource extraction.

Department is the Australian Government Department administering the *Environment Protection and Biodiversity Conservation Act 1999*.

foraging species includes Tuart (*Eucalyptus gomphocephala*), Marri (*Corymbia calophylla*), Jarrah (*Eucalyptus marginata*), *Acacia saligna*, *Banksia attenuata*, *Banksia grandis*, *Banksia menziesii* and *Allocasuarina fraseriana* species.

Forest Red-tailed Black-Cockatoo is the black cockatoo species *Calyptorhynchus banksii naso*

Minister is the Minister administering the *Environment Protection and Biodiversity Conservation Act 1999* and includes a delegate of the Minister.

offset site is an area no less than 10.8 hectares in size surrounding Black Swan Swamp located adjacent to the western boundary of the **project area** and identified as the 'Proposed planting area' at Attachment A.

potential breeding species includes Tuart (*Eucalyptus gomphocephala*), Marri (*Corymbia calophylla*) and Jarrah (*Eucalyptus marginata*) trees.

potential breeding trees includes standing dead stags, mature Tuart (*Eucalyptus gomphocephala*), Marri (*Corymbia calophylla*) and Jarrah (*Eucalyptus marginata*) trees with a diameter at breast height (DBH) of fifty (50) centimetres (cm) or greater.

potential nesting trees includes **potential breeding trees** with a hollow at least 20 cm in diameter and therefore large enough for **black cockatoos** to nest in.

project area is the portion of Lot 9099 Mandjoogordap Drive, Mandurah, Western Australia, identified as the 'Development Area' at Attachment A – attached to conditions of approval.

suitably qualified and experienced person is a person with relevant tertiary qualifications and with experience surveying for black cockatoos.



Figure 1 Proposal area

Scale: 1:10,000 @ A2



Coordinate System: GDA 1994 MGA Zone 50
 Note that positional errors may occur in some areas
 Date: 4/11/2014
 Author: JCrute
 Source: Aerial Image; Client 2013.



Legend

- Proposal area
- Proposed planting area
- Development area



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 | Site inspection 3 February 2020 | Revegetation planting commenced in the area specified in 2016, with infill planting undertaken within the revegetation areas during July 2018. There was no infill planting undertaken during this audit period. Landscaping works involving revegetation were completed in July 2017. | 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. | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 Management advice on 3 February 2020 | This requirement was assessed as compliant in the 2016, 2017, 2018 and 2019 ACR, which identified that revegetation using 6200 breeding and foraging species as defined in the EPBC 2013/7048 approval occurred in 2016. The annual revegetation monitoring survey undertaken on 17 October 2019 (R_001) stated that this criterion has been met and was confirmed by inspection of the planting list. | C |
| RMP 3 | Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ - No greater than 10% weed cover - No Declared Plants or weeds of national environmental significance. | At completion. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 Site inspection on 3 February 2020 P_012-Strategen-JBSG_offset area weed P_013-Strategen-JBSG_offset area weed C010_Workpower-weed control_12022020 | Weeds were observed in the revegetation area during the site inspection on 3 February 2020. The annual revegetation monitoring survey undertaken on 17 October 2019 (R_001) identified quadrats 1 and 2 in the revegetation area contained heavy weed infestations (30% and 55% weed cover, respectively). In addition, quadrant 2 contained a declared plant (* <i>Gomphocarpus fruticosus</i>). Quadrats 3 – 6 had less than 10% weed cover. Contingency actions as per the RMP are now being implemented to remediate weeds (refer RMP 56 for details). | PNC |
| RMP 4 | Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ - Implement contingency measures as outlined in section 6 if grazing is observed on planted seedlings. | At completion. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 C006_Strategen-JBS&G Revegetation monitoring methods_18022020 | Results of the annual revegetation monitoring survey undertaken on 17 October 2019 revealed there was some evidence of pest (insect) grazing in the revegetation areas and no evidence of grazing in the landscaping areas. Contingency measures for grazing control were not required to be implemented during this audit period as per RMP 53-54. | 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. | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 | This criterion was deemed completed in the previous audit report (R_003). | C (complete) |
| 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 | NA |
| 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. | Refer to RMP 2 | Refer to RMP 2 | C |
| 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | The results of the annual revegetation monitoring survey undertaken on 17 October 2019 indicates that the "actual density for both breeding and foraging species is above the target density and is currently meeting the criterion for 80% survival". | C |
| 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. | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 | Assessment of this item in the previous ACRs (2016 to 2019) is still applicable to this audit period which identified: 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. Workpower maintain a NIASA accredited wholesale nursery, with seedlings used for infill in the revegetation areas. | 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 activities taking place. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | The annual revegetation monitoring survey undertaken on 17 October 2019 (R_001) identified weed species, locations and abundance within the revegetation areas. | C |
| RMP 11 | Table 3: Management actions (revegetation areas) | Prior to seedling planting taking place | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 | As reported in the 2019 audit report, infill planting was last undertaken in winter 2018 as a result of the 2017 survey. Based on the results of the 2018 | C |

| Reference | Condition | Timing | Evidence | Comments | Conformance status |
|-----------|--|--|--|---|--------------------|
| | 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. | in accordance with chemical specifications. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 R_004_Strategen-JBS&G_Mandjoogordap Drive revegetation monitoring report_07022020 | survey, no further infill planting was considered necessary for the revegetation area in 2019. Although infill planting was not required, two rounds of weed control were undertaken in winter and spring 2019. | |
| RMP 12 | Table 3: Management actions (revegetation areas) Undertake seedling planting as described in Section 4.3. | After the completion of initial weed control. | Refer to RMP 5 R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | Seedling planting has been undertaken as per Section 4.3 and has been deemed as compliant during previous audits. No infill planting of seedlings was undertaken in the revegetation area during this audit period. | 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. | Site inspection on 3 February 2020 P_021-Strategen-JBSG_southern reveg area seedling 1 stake C009_Strategen-JBS&G RMP and weed control_09032020 R_006_Workpower quote tree guard maintenance_02122019 | Tree guards were observed by the auditors during the site inspection on 3 February 2020 for seedlings planted in the revegetation area. All guards comprised a protective guard, however some were observed to be installed with only one stake and not the required minimum of three stakes. Correspondence from Peet's environmental consultants confirmed that all tree plantings are undertaken with the appropriate guards (i.e. 3 stakes) at the time of planting. Removal and damage to tree guards is a common occurrence within this POS, and requires regular, ongoing work to maintain. Workpower have been engaged on multiple occasions to reinstall tree guards at the revegetation area and following the site inspection were again engaged to amend the condition of tree guards. | 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. | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | As reported in the 2019 audit report, infill planting was last undertaken in winter 2018 as a result of the 2017 survey. Based on the results of the 2018 survey, no further infill planting was considered necessary for the revegetation area during this audit period. | NA |
| 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. | C005_Workpower_Hygiene control revegetation areas_20022020 R_005_Workpower Hygiene Inspection Checklist_2020 | Workpower are contracted by Peet to undertake works within the revegetation areas. Workpower advised that all key staff have completed Dieback Protection in Bushland training at Murdoch (ACHPMG302A – Control Plant Pests, Diseases and Disorders) and follow the Dieback Working Group Guidelines. A completed pre-start hygiene inspection checklist for the Lakeland East revegetation area was provided for 28 occasions between 15 February 2019 to 10 February 2020 declaring footwear, vehicle and equipment were free of mud, soil prior to site entry. | 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. | Refer to RMP 9 | Refer to RMP 9 | 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | The annual revegetation monitoring survey undertaken on 17 October 2019 (R_001) identified weed species, locations and abundance within the landscaping area. | 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. | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 C001_HorizonWest_WeedControlEmail_12022020 | Based on the results of the 2018 survey, no further infill planting was considered necessary for the landscaping area in 2019 during this audit period. Correspondence from Peet's landscaping area vegetation and weed control contractor Horizon West showed that weed control in the form of spot spraying was undertaken in the landscaping area on at least 26 occasions during the audit period. | C |
| 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 C001_HorizonWest_WeedControlEmail_12022020 | As per RMP 18, ongoing maintenance weed control in the form of spot spraying was undertaken in the landscaping area on at least 26 occasions during the audit period. | C |

| Reference | Condition | Timing | Evidence | Comments | Conformance status |
|-----------|--|---|---|---|--------------------|
| 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. | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | Seedling planting has been undertaken as per Section 4.3 and has been deemed as compliant during previous audits. No infill planting of seedlings was undertaken in the landscaping area during this audit period. | C |
| RMP 21 | Table 4: Management actions (landscaping areas in the offset site) 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. | Site inspection on 3 February 2020 P_034-Strategen-JBSG_stage 66 POS landscaping area 3 stakes | Tree guards were observed by the auditors during the site inspection on 3 February 2020 for seedlings planted in the landscaping areas. All guards comprised a protective guard and had a minimum of three stakes. | C |
| 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. | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | As reported in the 2019 audit report, infill planting was last undertaken in winter 2018 as a result of the 2017 survey. Based on the results of the 2018 survey, no further infill planting was considered necessary for the landscaping area in 2019. | NA |
| 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. | C001_HorizonWest_WeedControlEmail_12022020 C003_HorizonWest_Hygiene Measure Email_12022020 | Correspondence from Horizon West on 12 February 2020 stated that no trucks enter the landscaping area and provided a log sheet showing a sign on sheet for cleaning of lawn mowers prior and after being on site. However, there were no records showing implementation by personnel of hygiene procedures for other equipment or footwear prior to site entry. | PNC |
| 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. | C001_HorizonWest_WeedControlEmail_12022020 | Correspondence received from Horizon West on 12 February 2020 showed that they conducted chemical weed control through spot spraying within the landscaping area during the audit period. | 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 R_004_Strategen-JBS&G_Mandjoogoordap Drive revegetation monitoring report_07022020 | Based on the results of the 2018 survey, no further infill planting was considered necessary for the revegetation area in 2019, therefore broad scale weed spray over the revegetation site prior to planting was not required. However, weed control was undertaken on 2 occasions during the audit period. | NA |
| 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. | Management advice on 3 February 2020 | Management advised that Workpower undertook spot spraying for weeds during the current audit period. | C |
| 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 on 3 February 2020 | 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 5 years 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. | Refer to RMP 9 and 16 | Refer to RMP 9 and 16 | 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. | Refer to RMP 5 and 7 R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 | As per last year's audit report, the species of all the 6200 seedlings planted are as per the defined list. | 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. | Management advice on 3 February 2020 | Management advised that no seed collection was required during this audit period. | C |
| 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. | Refer to RMP2 and 12 | Refer to RMP 2 and 12 | 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. | Management advice on 3 February 2020 | Management advised that no infill planting was undertaken during the audit period. | NA |

| Reference | Condition | Timing | Evidence | Comments | Conformance status |
|-----------|--|--|--|---|--------------------|
| | | | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | | |
| 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | The annual revegetation monitoring survey undertaken on 17 October 2019 (R_001) stated that the target stocking rate is currently being met, therefore no 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. | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 Management advice on 3 February 2020 | This criterion was deemed conformant during the previous audit report (R_003). Management advised that there was no infill planting of seedlings during this audit period. | 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. | Management advice on 3 February 2020 R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | Management advised that there was no requirement for infill planting of seedlings during this audit period. | NA |
| 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 C006_Strategen-JBS&G Revegetation monitoring methods_18022020 C012_Strategen-JBS&G Water stress_23032020 C013_Strategen-JBS&G soil sampling & weed control_23032020 | Refer to RMP 55 Annual monitoring of revegetation and landscaping areas was undertaken on 17 October 2019, with plant survival in the southern portion of the rehabilitation area ranging from 20 – 70% of 2018 plantings (i.e. deaths of 30-80% of 2018 plantings). Correspondence from Peet’s environmental consultants and revegetation contractor Workpower have stated that it was not conclusive as to what was the cause of plant stress resulting in deaths, although soil quality is considered likely. Workpower confirmed that they have used soil wetta previously in these areas which did not improve seedling success. Significant signs of water stress were not observed at any revegetation area and therefore a wetting agent or additional watering options were not applied during this audit period. | 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. | Management advice on 3 February 2020 R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | Management advised that there was no requirement for supplementary seedling planting during this audit period. | NA |
| 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 3 February 2020 P_034-Strategen-JBSG_stage 66 POS landscaping area 3 stakes | Tree guards installed around planted seedlings were observed by the auditors during the site inspection on 3 February 2020 to provide protection from browsing animals. | 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. | Management advice on 3 February 2020 R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | Management advised that there was no requirement for infill planting of seedlings during this audit period. | NA |
| 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. | C005_Workpower_Hygiene control revegetation areas_20022020 R_005_Workpower Hygiene Inspection Checklist_2020 C001_HorizonWest_WeedControlEmail_12022020 C003_HorizonWest_Hygiene Measure Email_12022020 | Refer to RMP 15 and 23. The revegetation area contractor, Workpower provided a completed pre-start hygiene inspection checklist for the Lakeland East revegetation area was provided for 28 occasions between 15 February 2019 to 10 February 2020 declaring footwear, vehicle and equipment were free of mud, soil prior to site entry. Revegetation areas were compliant with this requirement. The landscaping area contractor, HorizonWest provided correspondence stating that no trucks enter the landscaping area and provided a log sheet showing a sign on sheet for cleaning of lawn mowers prior to and after being on site. However, there were no records showing implementation by | PNC |

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| | | | | personnel of hygiene procedures for other equipment or footwear prior to site entry for landscaping areas. | |
| 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 2019. | Management advice on 3 and 17 February 2020 C007_Revegetation Management Plan Change in covenant date_18022020 R_007_RMP_R005 Rev 7_19092020 | Management advised that the date of the application of the conservation covenant was not applied over the offset site by 30 June 2019. An amendment to the RMP (revision 7) is to be submitted along with this ACR with a new date for the conservation covenant to be implemented (30 June 2020). Previous correspondence with DAWE regarding the last amendment to the RMP involving a change in the date of the covenant was considered by DAWE to as not likely to constitute a new or increased impact on any EPBC Act matter protected by the controlling provisions for the action. | PNC |
| 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 Site inspection 3 February 2020 P_027-Strategen-JBSG_northern reveg area quadrat 2 stake | The annual revegetation monitoring survey undertaken on 17 October 2019 (R_001) stated six permanent 10 m by 10 m monitoring plots were assessed within the revegetation area. Monitoring plot for quadrat 2 was observed by the auditors during the site inspection on 3 February 2020. It was noted that revegetation monitoring is being undertaken annually which is more frequent that 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. | C006_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. | NA |
| 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: • flora species composition • vegetation structure • 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. | Every three years. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | The annual revegetation monitoring survey undertaken on 17 October 2019 (R_001) and data was collected on the required parameters. | C |
| 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | The annual revegetation monitoring survey was undertaken on 17 October 2019 (R_001) 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: • plant stress • plant mortality • weed species. | Every three years. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | Observations in landscaping areas were undertaken on 17 October 2019 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | Annual monitoring for the revegetation and landscaping areas was undertaken on 17 October 2019 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 R_002_strategen-JBS&G_Lakelands RMP Rev 6_092017 | Monitoring of six permanent quadrats established within the revegetation area were assessed on 17 October 2019 and included species composition of planted flora, abundance of each planted flora species and native plant health. Monitoring of quadrats 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | Annual monitoring of weed species in the revegetation and landscaping areas was undertaken on 17 October 2019. 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 | Every three years. | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 | Table 10 of the RMP applies to the contingency measures in the revegetation area. The previous audit report (R003) found that all criteria in table 10 were met apart from the weed cover criteria (refer RMP 56). The ACR | C |

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| | offset site (Table 4) have not been successful or effective and/or completion criteria are not being achieved (Table 10). | | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 C001_HorizonWest_WeedControlEmail_12022020 | recommended that current weed control procedures be reviewed to ensure they are effective across the revegetation and landscaping area. In response to this, weed control during this audit period was increased to 2 occasions in the revegetation area and 26 occasions of spot spraying in the landscaping areas. | |
| 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. | R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019 R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 W_001_Peet_Website 2019 ACR_100202020 | Contingency actions are reported to the DotE (now AWE) in the annual ACR reports which are published annually on the Peet website (refer EPBC 8.1). | 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. 1. Identify cause. 2. 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. 3. Monitor success of contingency measure(s). | As required. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | The survival rates of planted potential breeding species or foraging species were determined based on the revegetation monitoring undertaken on 17 October 2019. Results showed that the actual density for both breeding and foraging species is above the target density and is currently meeting the criterion for 80% survival, therefore no contingency measures were required to be implemented during this audit period. | C |
| RMP 53 | Approximately 20% of seedlings planted show evidence of damage by animal (i.e. grazing). 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 C006_Strategen-JBS&G Revegetation monitoring methods_18022020 | Annual monitoring of revegetation and landscaping areas undertaken on 17 October 2019 states that quadrats 1 and 2 within the northern section of the revegetation site showed some evidence of pest grazing on some species by insects, with no evidence of grazing by animals (kangaroos, rabbits). There was no evidence of grazing in quadrats 3-6 recorded in the southern section of the revegetation area. Since grazing was noted to be sporadic throughout the rehabilitation area, control measures were not required to be implemented. There was no grazing by pest animals or insects observed on seedlings planted within the landscaping area. | C |
| 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 C006_Strategen-JBS&G Revegetation monitoring methods_18022020 | Annual monitoring of revegetation and landscaping areas undertaken on 17 October 2019 states that quadrats 1 and 2 within the northern section of the revegetation site showed some evidence of pest grazing on some species by insects, with no evidence of grazing by animals (kangaroos, rabbits). There was no evidence of grazing in quadrats 3-6 recorded in the southern section of the revegetation area. Since grazing was noted to be sporadic throughout the rehabilitation area, control measures were not required to be implemented. There was no grazing by pest animals or insects observed on seedlings planted within the landscaping area. | C |
| 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. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 C006_Strategen-JBS&G Revegetation monitoring methods_18022020 C012_Strategen-JBS&G Water stress_23032020 C013_Strategen-JBS&G soil sampling & weed control_23032020 | Results of annual monitoring of revegetation and landscaping areas on 17 October 2019 showed that plant survival in the southern portion of the rehabilitation area ranged from 20 – 70% of 2018 plantings (i.e. deaths of 30-80% of 2018 plantings). Correspondence from Peet’s environmental consultants and revegetation contractor Workpower have stated that it was not conclusive as to what was the cause of plant stress resulting in deaths. Workpower confirmed that they have used soil wetta previously which did not improve seedling success in these areas. Significant signs of water stress have not been observed at any revegetation area and therefore plant deaths are considered likely to be related to the soil quality (e.g. pH, salinity, or nutrients). As a result, no contingency measures for water stress were implemented during this audit period. | C |
| 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). | As required. | R_001_strategen-JBS&G_Lakelands revegetation monitoring report_10022020 | Annual monitoring of revegetation and landscaping areas undertaken on 17 October 2019, identified that monitoring quadrats 1 and 2 in the revegetation area showed heavy weed infestations and contained greater | C |

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| | 2. Implement measures to remove weeds (e.g. weed control) as practicable. 3. Monitor success of contingency measure(s). | | C010_Workpower-weed control_12022020 C011_Workpower-weed control_16012020 C013_Strategen-JBS&G soil sampling & weed control_23032020 | than 10% weed cover (30% and 55%, respectively). Quadrat 2 contained a declared plant (* <i>Gomphocarpus fruticosus</i>). Quadrats 3 – 6 had weed foliage cover of 10% or less. Weed control was undertaken on 2 occasions during the audit period. Contingency actions as per the RMP were implemented during the audit period to remediate this. Following the site inspection, Workpower were on site in January 2020 to remove the Cottonbush that were identified. Subsequent weed control works are also being planned for the remainder of the year. Weed foliage cover was negligible throughout landscaping areas, therefore contingency actions were not required in the landscaping area; however spot spraying of weeds with a focus on lower-lying areas is recommended throughout the landscaping area. | |
| 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. | Management advice on 3 February 2020 Site inspection on 3 February 2020 P_001_Strategen-JBS&G_boundary fence hole P_002_Strategen-JBS&G_Boundary fence hole | The auditors noted a couple of holes in the site boundary fence during the site inspection on 3 February 2020. Management advised that fencing and cameras are installed along the site boundary fence as needed and that it is impractical to implement further prevention measures. | 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. | Management advice on 3 February 2020 | PEET maintained responsibility of the implementation of the RMP throughout the audit period. Handover from PEET to the CoM is not scheduled for approximately 5 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. | Management advice on 3 February 2020 | Handover from PEET to the CoM is not scheduled for approximately 5 years | NA |
| 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 on 3 February 2020 | Management advised that all contractors and staff are required to operate in accordance with the RMP. As per the 2019 audit, the landscaping area contractor Horizon West are still not documenting the implementation of dieback and hygiene procedures onsite within the landscaping areas; whereas the revegetation area contractor, Workpower were compliant (refer to RMP 40 for details). | PNC |

Notes:

1. Completion criterion for this item is not required to be assessed until project completion.

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