

Peet Yanchep Land Syndicate  
Annual Compliance Report (EPBC 2014/7146)  
Lot 609 Yanchep Beach Road, Yanchep

26 September 2019

56792-123270

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

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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)

CLAYTON THOMAS

Position (please print)

SENIOR DEVELOPMENT MANAGER

Organisation (please print including ABN/ACN if applicable)

PEET LTD

Date

26 / 09 / 19

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## **1. Introduction**

This report addresses the status and compliance of implementation of Peet Yanchep Land Syndicate (Peet) with the conditions in *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval decision notice 2014/7146 (EPBC 2014/7146) for the Yanchep Golf Estate (YGE) residential development. This report has been prepared for the purpose of meeting the requirements of condition 6 of EPBC 2014/7146, which requires the proponent to prepare and publish annual compliance reports of the previous 12 months.

### **1.1 Project background**

Peet is in the process of developing parts of Lot 609 Yanchep Beach Road, located near Yanchep, Western Australia (Yanchep Golf Estate, the Project). The Project will include approximately 1500 lots within the 150 ha Project site (of which 118 ha was referred as part of EPBC 2014/7146) (Figure 1). In addition to the residential lots, the Project will include a site for a proposed school, community centre, roads and active Public Open Space (POS).

The Project involves the clearing of approximately 56.6 ha of foraging habitat and 7.4 ha of potential breeding habitat for Carnaby's Black Cockatoo. The Project includes the retention of 3.6 ha of potential Carnaby's Black Cockatoo foraging habitat and 1 ha of potential breeding habitat in conservation POS.

### **1.2 Environmental approval to implement project**

The Project was determined to be a controlled action under the EPBC Act on 31 March 2014 due to the potential for significant impacts on listed threatened species and communities (sections 18 and 18A). The Project was assessed on referral information with approval issued on 13 June 2014. The Project commenced on 26 June 2014.

A variation to EPBC 2014/7146 was approved on 1 July 2014. The variation request included a revised Attachment A.

Another variation to EPBC 2014/7146 was approved on 8 July 2016. The variation request included a further revision to Attachment A and an amendment to condition 8 to align with the 'revised management plan condition' template advocated by the Department of the Environment and Energy (DEE). Related and other amendments to the Carnaby's Black Cockatoo Avoidance and Mitigation Plan (CBCAMP) required under condition 3 were also approved as part of the 8 July 2016 variation.



## 2. Current Status

Activities undertaken during the audit period (27 June 2018 to 26 June 2019) involved the following:

- clearing of approximately 5.88 ha as part of stage 14 development
- planting of 21 verge street trees, as part of the front landscaping bonus, including predominately Carnaby's Black Cockatoo species
- construction within Stage 14.

### 3. Audit methodology

#### 3.1 Audit plan

##### 3.1.1 Purpose and scope

This document has been prepared for Peet (the proponent) to fulfil the requirements of condition 6 of EPBC 2014/7146 issued to enable implementation of the YGE development. Condition 6 states:

*‘Within three months of every 12 months anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval over the previous 12 months, including implementation of the CBCAMP 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 12 months from the date of publishing. Potential or actual contraventions of the conditions of the approval must be reported to the department in writing within 2 business days of the person taking the action becoming aware of the actual or potential contravention. All contraventions must also be included in the compliance reports.’*

This Annual Compliance Report (ACR) addresses the audit period between 27 June 2018 and 26 June 2019. The ACR addresses each condition of approval. Key management actions of the CBCAMP were also assessed to determine if the plan had been satisfactorily implemented as required by condition 3.

##### 3.1.2 Methodology

The audit was undertaken in July and August 2019 and involved a site inspection (9 July 2019), interviews with key members of the project team and a review of documentation to support the audit.

Table 3.1 provides an overview of the personnel consulted as part of the audit.

**Table 3.1: Persons consulted during the audit**

Organisation	Person and position	Purpose
Peet	<ul style="list-style-type: none"> <li>• Olivia Hammond - Development Manager</li> <li>• Kati Meijer - Assistant Development Manager</li> <li>• Jack Wagner - Development Officer</li> <li>• James Hansen – Assistant Development Manager</li> </ul>	To provide an overview of activities undertaken on site during the audit period to assess implementation and performance of EPBC 2014/7146 condition and CBCAMP.

#### 3.2 Audit terminology

The ‘Status’ field of the audit tables (refer to Table 4.1; Appendix A) describes the implementation of actions and compliance with the approval. Terminology from the DEE, (formally known as the Department of the Environment (DotE [2014])) Annual Compliance Report Guidelines was adapted and applied in this audit (Table 3.2).

**Table 3.2: Action implementation status**

Status	Acronym	Description
<b>Conditions of approval</b>		
Compliant	C	All the requirements of a condition have been met, including the implementation of management plans or other measures required by condition.
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.



Status	Acronym	Description
Not applicable	N/A	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	All the requirements of a key management action detailed within a subsidiary plan or program have been satisfactorily met.
Potentially non-conformant	PNC	All the requirements of a key management actions detailed within a subsidiary plan or program have not been met satisfactorily.
Not applicable	N/A	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 2014/7146 are shown in Table 4.1. Condition 3 requires the preparation, submission for approval and implementation of the approved CBCAMP. The results of conformance with the management actions contained within the CBCAMP are outlined in Appendix A. A total of 50 items were audited from EPBC 2014/7146 and the CBCAMP.

### **4.1 Compliance with conditions**

No potential non-compliances with conditions of EPBC 2014/7146 were identified during the audit (Table 4.1). Two potential non-conformances were identified with management actions of the CBCAMP (Appendix A).

**Table 4.1: EPBC 2014/7146 audit table**

Condition Number	Condition	Timing	Compliance status	Evidence	Comments
EPBC 1.1	The person taking the action must not clear more than 64 hectares of Carnaby's Black-Cockatoo foraging and potential breeding habitat within the project area identified as the 'Development Area' at Attachment A.	During clearing.	C	Site inspection 10 July 2019 G_001_RJV_Yanchep Stage 14A - Clearing Extent_21082019 G_003_Nearmap_Clearing extent comparison_18072019 G_004_MNG_YGE Clearing Areas_20092019	A total of 5.88 ha was cleared during the audit period, (G_001), of which, 0.3 ha comprised Carnaby's Black Cockatoo (CBC) habitat (G_004). To date, a total of 16.3 ha of CBC habitat has been cleared (G_004).
EPBC 2.1	To offset the loss of Carnaby's Black-Cockatoo foraging and potential breeding habitat, within three months of the date of this approval, the person taking the action must provide the Department with written evidence that funds have been provided to the Western Australian Department of Parks and Wildlife for the acquisition of an environmental offset property, no less than 315 hectares in size on Mimegarra Road, Mimegarra, north-east of Lancelin, Western Australia.	Within 3 months of the date of approval (13 June 2014). By 13 September 2014.	C (Completed)	R_001_Strategen_Lot 609 Yanchep Beach Road Yanchep (EPBC 2014/7146) Annual Compliance Report 2018_17092018	N/A – completed.
EPBC 2.2	The written evidence must include a description and map clearly defining the location and boundaries of the offset property and be accompanied with the offset attributes.	Within 3 months of the date of approval (13 June 2014). By 13 September 2014.	C (Completed)	Refer to EPBC 2.1	N/A – completed.
EPBC 2.3	The person taking the action must also inform the Department how much of this offset property remains unattributed to this action for the purpose of supplying offsets for potential future projects.	Within 3 months of the date of approval. (13 June 2014). By 13 September 2014.	C (Completed)	Refer to EPBC 2.1	N/A – completed.
EPBC 3.1	To mitigate impacts to the Carnaby's Black-Cockatoo, prior to the commencement of the action, the person taking the action must prepare and submit a Carnaby's Black-Cockatoo Avoidance and Mitigation Plan (CBCAMP) for the Minister's approval. The CBCAMP must include but not be limited to: a) A map clearly illustrating the area of Carnaby's Black-Cockatoo foraging and potential breeding habitat to be cleared and the area of Carnaby's Black-Cockatoo foraging and potential breeding habitat to be retained within the development footprint;	Prior to the commencement of the action.	C (Completed)	R_001_Strategen_Lot 609 Yanchep Beach Road Yanchep (EPBC 2014/7146) Annual Compliance Report 2018_17092018  R_002_Strategen_Carnaby's Black Cockatoo Avoidance and Mitigation Plan_21062016	N/A – completed.  Also refer to EPBC 8.1 regarding revisions to, and approval of, the CBCAMP.
EPBC 3.2	b) Milestones and objectives of the CBCAMP;	Prior to the commencement of the action.	C (Completed)	Refer to EPBC 3.1	N/A – completed.
EPBC 3.3	c) Avoidance and mitigation measures to reduce impacts to Carnaby's Black-Cockatoo habitat prior to, during and post construction;	Prior to the commencement of the action.	C (Completed)	Refer to EPBC 3.1	N/A – completed.
EPBC 3.4	d) Timeframes for the implementation and completion of the avoidance and mitigation measures;	Prior to the commencement of the action.	C (Completed)	Refer to EPBC 3.1	N/A – completed.
EPBC 3.5	e) Details of monitoring, reporting and contingency measures if performance indicators are not met; and	Prior to the commencement of the action.	C (Completed)	Refer to EPBC 3.1	N/A – completed.
EPBC 3.6	f) Roles and responsibilities of personnel associated with implementing each of the avoidance and mitigation measures;	Prior to the commencement of the action.	C (Completed)	Refer to EPBC 3.1	N/A – completed.
EPBC 3.7	The person taking the action must not undertake any clearing of Carnaby's Black-Cockatoo foraging and potential breeding habitat within the project area unless the CBCAMP has been approved by the Minister. If the Minister approves the CBCAMP, then the approved CBCAMP must be implemented.	No clearing - prior to the commencement of the action.	C	Refer to EPBC 3.1 Refer to Appendix A	Refer to EPBC 3.1 – CBCAMP approved. Of the 21 actions of the CBCAMP, Peet was found to be potentially non-conformant with 2 action and conformant with 16 actions. The other 3 actions were found to be not applicable during this audit period. Refer to Appendix A.
EPBC 4.1	Within 30 days after the commencement of the action, the person taking the action must advise the Department in writing of the actual date of commencement.	Within 30 days after commencement. By 26 July 2014.	C (Completed)	R_001_Strategen_Lot 609 Yanchep Beach Road Yanchep (EPBC 2014/7146) Annual Compliance Report 2018_17092018	N/A – completed.
EPBC 5.1	The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the CBCAMP and make them available upon request to the Department.	Ongoing.	C	N/A	Accurate records for all applicable conditions have been maintained and were available at the time of audit and following the audit (refer to the other items in this table, and Appendix 1).
EPBC 5.2	Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval.	As required (DEE decision).	N/A	N/A	This condition is taken to be a note.
EPBC 5.3	Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	As required (DEE decision).	N/A	N/A	This condition is taken to be a note.
EPBC 6.1	Within three months of every 12 month anniversary of the commencement of the action, the person taking the action must publish a report on their	Within three months of every 12 month anniversary	C	R_001_Strategen_Lot 609 Yanchep Beach Road Yanchep (EPBC 2014/7126) Annual Compliance Report 2018_17092018	The previous 2017/18 compliance report (R_001) was due to be published by 26 September 2018. Publishing of the ACR was confirmed

Condition Number	Condition	Timing	Compliance status	Evidence	Comments
	website addressing compliance with each of the conditions of this approval over the previous 12 months, including implementation of the CBCAMP as specified in the conditions.	commencement. Based on construction commencing on 26 June 2014, report is required to be published on or before 26 September 2015 (3 months following 26 June each year).		C_001_Yanchep Golf Estate EPBC Act Compliance Report_11072019	by email (C_001) on 18 September 2018, as having been published on the same day.
EPBC 6.2	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.	Same day the compliance report is published.	C	Refer to EPBC 6.1	Refer to EPBC 6.1.
EPBC 6.3	The compliance reports must remain on the website for 12 months from the date of publishing.	For 12 months from the date of publishing.	C	W_001_Peet Website_12072019	The 2015/2016, 2016/2017 and 2017/2018 ACRs were available on the Peet website when checked on 10 July 2019 and, at the time of report preparation (W_001) remain available on the website via the following link: <a href="https://www.peet.com.au/communities/perth-and-wa/yanchep-golf-estate/building-information/environmental-sustainability">https://www.peet.com.au/communities/perth-and-wa/yanchep-golf-estate/building-information/environmental-sustainability</a>
EPBC 6.4	Potential or actual contraventions of the conditions of the approval must be reported to the department in writing within 2 business days of the person taking the action becoming aware of the actual or potential contravention.	Within 2 business days of being aware of NC/PNC.	N/A	R_001_Strategen_Lot 609 Yanchep Beach Road Yanchep (EPBC 2014/7146) Annual Compliance Report 2018_17092018	Refer to the findings for other items in this table – no potential or actual contraventions have been identified to date.  No potential or actual contraventions were identified in the 2017/2018 audit (R_001).
EPBC 6.5	All contraventions must also be included in the compliance reports.	Same day the compliance report is published.	N/A	R_002_Peet_Lot 609 Yanchep Beach Road, Yanchep (EPBC 2014/7146) Annual Compliance Report 2018_27062017	Refer to the findings for other items in this table – no potential or actual contraventions have been identified to date.  No potential or actual contraventions were identified in the 2017/2018 assessment.
EPBC 7.1	Upon the direction of the Minister, the person taking the action must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister.	As required (Minister's direction).	N/A	Management advice 9 July 2019	The Minister has not issued a directed audit notice to date.
EPBC 7.2	The independent auditor must be approved by the Minister prior to the commencement of the audit.	As required (Minister's direction).	N/A	N/A	Refer to EPBC 7.1.
EPBC 7.3	Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	As required (Minister's direction).	N/A	N/A	Refer to EPBC 7.1.
EPBC 8.1	a) The person taking the action may choose to revise the CBCAMP approved by the Minister under condition 3 without submitting it for approval (including approval under section 143A of the EPBC Act), if the taking of the action in accordance with the revised CBCAMP would not be likely to have a new or increased impact. If the person taking the action makes this choice they must: i. notify the Department in writing that the approved CBCAMP has been revised and provide the Department with: • an electronic copy of the revised CBCAMP • an explanation of the difference between the revised CBCAMP and the approved CBCAMP; and • the reasons the person taking the action considers that taking the action in accordance with the revised CBCAMP would not be likely to have a new or increased impact. ii. Declared in writing a date on which the revised CBCAMP will first be implemented by the person taking the action. That date of initial implementation must be at least 28 days after sub-condition 8 a) i. is satisfied.	Prior to undertaking any activity otherwise than in accordance with the CBCAMP. Implementation - at least 28 days after sub-condition 8 a) i. is satisfied.	C	C_002_DEE_CBCAMP Revision 6 Approval_08072016	There were no variations to the CBCAMP during the audit period. The last revision of the CBCAMP (revision 6) was submitted on 2 June 2016 and approved on 8 July 2016 (C_002).
EPBC 8.2	b) The person taking the action may revoke their choice under condition 8 a) at any time by giving written notice to the Department, in which case from the following day the person taking the action must implement the approved CBCAMP.	At any time.	N/A	Management advice 7 July 2019	This condition was not invoked in the audit period.
EPBC 8.3	c) If the Minister gives a notice to the person taking the action that the Minister is satisfied that the taking of the action in accordance with the revised CBCAMP would be likely to have a new or increased impact, then: i. Sub-condition 8 a) does not apply, or ceases to apply, in relation to the revised CBCAMP; and	N/A.	N/A	Management advice 7 July 2019	The Minister did not give such notice in the audit period.

Condition Number	Condition	Timing	Compliance status	Evidence	Comments
	<p>ii. The person taking the action must implement the CBCAMP approved by the Minister.</p> <p>To avoid any doubt, this condition does not affect any operation of sub-conditions 8 a) and 8 b) 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 sub-condition 8 a) does not apply to the CBCAMP required under the approval.</p> <p><i>Note: this condition is not intended to limit the operation of section 143A of the EPBC Act which allows the person taking the action to submit a revised action management plan to the Minister for approval.</i></p>				
EPBC 9.1	If, at any time after five (5) years from the date of this approval, the person taking the action has not commenced the action, then the person taking the action must not commence the action without the written agreement of the Minister.	After five years from approval date.	C (Completed)	R_001_Strategen_Lot 609 Yanchep Beach Road Yanchep (EPBC 2014/7146) Annual Compliance Report 2018_17092018	N/A – completed.
EPBC 10.1	Unless otherwise agreed to in writing by the Minister, the person taking the action must publish the CBCAMP referred to in these conditions of approval on their website.	Within one month of CBCAMP approval (1 July 2014).	C	R_001_Strategen_Lot 609 Yanchep Beach Road Yanchep (EPBC 2014/7146) Annual Compliance Report 2018_17092018  W_001_Peet Website_12072019	<p>There were no revisions of the CBCAMP during the audit period.</p> <p>The latest revision of the CBCAMP (Revision 6) was approved on 8 July 2016. Peet confirmed publication of the revised CBCAMP on its website four days later on 12 July 2016 (R_001).</p> <p>The CBCAMP remains on the Peet website (W_001) at this address <a href="https://www.peet.com.au/communities/perth-and-wa/yanchep-golf-estate/building-information/environmental-sustainability">https://www.peet.com.au/communities/perth-and-wa/yanchep-golf-estate/building-information/environmental-sustainability</a>.</p>
EPBC 10.2	The CBCAMP must be published on the website within one (1) month of being approved and must remain on the website for the period this approval has effect.	Within one month of CBCAMP approval (1 July 2014).	C	Refer to EPBC 10.1	Refer to EPBC 10.1

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## **5. Conclusions and recommendations for improvement**

From the site inspection, interviews and review of documentation provided by Peet, the auditors concluded that all audited conditions of EPBC 2014/7146 and the majority of actions of the CBCAMP required by condition 3 of EPBC 2014/7146 were satisfactorily implemented during the audit period.

Where appropriate, the auditors have provided recommendations as outlined in Sections 5.1 and 5.2.

### **5.1 EPBC 2014/7146**

No recommendations for improvement were identified in the audit period.

### **5.2 Carnaby's Black Cockatoo Avoidance and Mitigation Plan**

One recommendation for improvement of the CBCAMP was identified during the audit. The audit found that the 3.6 ha future habitat retention area to the north east of the development was not demarcated based on its proximity to current construction areas and the level of restricted access. It is recommended that regular inspections of the area are undertaken to confirm no unauthorised access, despite development being some distance from these areas currently.

## **6. Limitations**

### **Scope of services**

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

### **Reliance on data**

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

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

### **Environmental conclusions**

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

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

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



## 7. References

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

## Appendix A Implementation of Carnaby’s Black Cockatoo Avoidance and Mitigation Plan

Carnaby's Black Cockatoo Avoidance and Mitigation Plan audit table

Reference	Key action	Timing	Conformance status	Evidence	Comments
CBCAMP 1	Table 4 Clearly mark Carnaby’s Black-Cockatoo habitat proposed to be retained (as indicated on Figure 3) on construction drawings and delineated by star pickets and coloured tape within the Project site. <i>Note performance target is: “Approximately 4 ha of Carnaby’s Black-Cockatoo habitat within the Project site is to be retained”.</i>	Pre & during clearing	C	G_001_RJV_Yanchep Stage 14A Clearing Extent_21082019  P_001_Peet_Construction area boundary fencing_22082019  P_002_Peet_Construction area boundary fencing_22082019  P_003_Peet_Construction area boundary fencing_22082019  P_004_Peet_Construction area boundary fencing_22082019  P_005_Peet_Construction area boundary fencing_22082019  P_006_Strategen JBSG_Construction area boundary fencing_22082019  Site inspection 9 July 2019  R_001_Strategen_Lot 609 Yanchep Beach Road Yanchep (EPBC 2014/7146) Annual Compliance Report 2018_17092018	The CBC foraging habitat to be retained as POS (3.60 ha), as identified in Attachment of EPBC 2014/7146 is isolated from construction activities and current stages of the development and shares a fence with the adjacent golf course which runs parallel to the Western boundary of the site (P_006). Given the restricted access to this CBC habitat retention site, the auditors assessed this action as conformant until such time that construction activities about the retention location.  Similarly, the CBC potential breeding habitat to be retained as POS areas (1.04 ha) is located approximately 1.2 km from the current construction and access is restricted to this area by fencing. Although the POS was not sighted during the site visit, previous audits have confirmed that flagging had been erected around retained vegetation (R_001).  Despite development adjacent to future POS areas not being anticipated for some time, the auditors recommend that regular inspections of these areas are undertaken to confirm no unauthorised access.
CBCAMP 2	Table 4 Clearly mark trees proposed to be retained on construction drawings and by coloured tape within the Project site.	Pre & during clearing	C	Refer to CBCAMP 1	Refer to CBCAMP 1.
CBCAMP 3	Table 4 Provide GPS co-ordinates of areas approved to be cleared and those required to be retained to the contractor to ensure no unapproved clearing is undertaken.	Pre & during clearing	C	C_004_C&W_Yanchep Golf Estate Stage 14A – Drawing Transmittal (Email 1 of 2) 02082018 C_005_C&W_Yanchep Golf Estate Stage 14A – Drawing Transmittal (Email 2 of 2) _02082018	Evidence of correspondence between civil contractors and engineers was sighted during the audit (C_004; C_005). The correspondence included details and mapping of areas approved to be cleared.
CBCAMP 4	Table 4 Vehicles will be prohibited from accessing any vegetation areas clearly marked and signed for retention.	Pre & during clearing	C	G_001_RJV_Yanchep Stage 14A Clearing Extent_21082019  P_001_Peet_Construction area boundary fencing_22082019  P_002_Peet_Construction area boundary fencing_22082019  P_003_Peet_Construction area boundary fencing_22082019  P_004_Strategen JBSG_Construction area boundary fencing_09072019  P_005_Strategen JBSG_Construction area boundary fencing_22082019	High construction fencing has been erected around cleared areas of the estate, restricting access to retained CBC habitat by vehicles and pedestrians (i.e. only authorised personnel can access these areas), addressing the requirement until such time construction stages about the retention locations (P_001-P_005).
CBCAMP 5	Table 4 Install temporary signage in accordance with CoW standard signage policy to restrict construction workers from entering Carnaby’s Black-Cockatoo habitat being retained in conservation POS.	Pre & during clearing	C	P_001_Peet_Construction area boundary fencing_22082019  P_002_Peet_Construction area boundary fencing_22082019  P_003_Peet_Construction area boundary fencing_22082019  P_004_Strategen JBSG_Construction area boundary fencing_09072019 _  P_005_Strategen JBSG_Construction area boundary fencing_22082019	High construction fencing has been erected around developed areas of the estate, restricting access to proposed retained CBC habitat by vehicles and pedestrians (i.e. only authorised personnel can access these areas), addressing the requirement for signage until such time construction stages about the retention locations (P_001; P_006).
CBCAMP 6	Table 4 Ensure no domestic animals, traps or firearms permitted onsite.	Pre & during clearing	C	Site inspection 9 July 2019  R_003_RJV_Yanchep Golf Estate Stage 14A Site Specific Induction _06122016  R_004_RJV_Yanchep Golf Estate Stage 14A Site Induction Reigster_22082019	No evidence of domestic animals, traps or firearms were observed during the site visit. The stage specific contractor induction (R_003; R_004) reiterates the requirement of this action.
CBCAMP 7	Table 4 If clearing during Carnaby’s Black-Cockatoo breeding season, conduct habitat tree assessments to check for nesting hollows.	Pre-clearing	PNC	G_001_RJV_Yanchep Stage 14A - Clearing Extent_21082019  G_004_MNG_YGE Clearing Areas_20092019	A total of 5.88 ha was cleared during the audit period (G_001), of which 0.3 ha comprised potential CBC breeding habitat (G_004). The CBC habitat was cleared in July 2018, within the CBC breeding season. No evidence that habitat tree assessments were conducted prior to this clearing was provided, therefore the auditors have assessed this item as potentially non-conformant.

Reference	Key action	Timing	Conformance status	Evidence	Comments
CBCAMP 8	Table 4 If active Carnaby's Black-Cockatoo nests are located in the site, do not clear until fledglings have left the nest.	Pre-clearing	PNC	R_003_RJV_Yanchep Golf Estate Stage 14A Site Specific Induction _06122016  R_004_RJV_Yanchep Golf Estate Stage 14A Site Induction Reigster_22082019  G_001_RJV_Yanchep Stage 14A - Clearing Extent_21082019  G_004_MNG_YGE Clearing Areas_20092019	The stage specific contractor induction (R_003; R_004) reiterates the requirement of this action, however, as no evidence of habitat tree assessments being conducted prior to clearing of potential CBC breeding habitat were provided, the auditors cannot verify compliance with this action.
CBCAMP 9	Table 4 Ensure cleared and any dry, dust-prone areas adjacent to conservation POS or stockpiles are stabilised to prevent dust generation. Stabilisation methods will include one or more of the following sealing methods: wetting (through use of water trucks), application of hydromulch, use of chemical polymers (if required) or other sealing material.	During construction	C	G_002_Peet_YGCE 14A Aerial Hydromulch_06042019 Site inspection 9 July 2019  P_004_Strategen JBSG_Construction area boundary fencing_09072019	Hydromulch was installed on site on areas that were recently cleared (G_002; P_004).  No evidence of any dust issues was observed during the site inspection. The risk of significant dust emissions being generated under the current staging works appeared low.
CBCAMP 10	Table 4 Restrict vehicle speeds to 40 km/hr to minimise dust generation on designated roads, access tracks and within construction areas adjacent to conservation POS.	During construction	C	R_007_RJV_YGE Environmental Management Plan_17082018	The 40 km/hr speed limit is a standard requirement for all RJV construction sites and is enforced through their Environmental Management Plan (R_007).
CBCAMP 11	Table 4 Induct all construction personnel in relation to dieback and weeds risk, potential impacts and management.	During construction	C	R_003_RJV_Yanchep Golf Estate Stage 14A Site Specific Induction _06122016  R_004_RJV_Yanchep Golf Estate Stage 14A Site Induction Reigster_22082019	Dieback and weeds are covered in the contractor's induction (R_003; R_004)
CBCAMP 12	Table 4 Make sure all vehicles; machinery and equipment are clean prior to entering site.	During construction	C	R_003_RJV_Yanchep Golf Estate Stage 14A Site Specific Induction _06122016  R_004_RJV_Yanchep Golf Estate Stage 14A Site Induction Reigster_22082019  R_005_RJV_YGCE 14A Washdown Register_22082019  P_001_RJV_WL48-Washdown_22082019  P_002_RJV_WL49-Washdown_22082019  P_003_RJV_WT19-Washdown_22082019  R_006_Stone Civil_ T5790 Loader L616 Weed Cert_250820185	Site washdown requirements are specified in the site induction (R_003; R_004). A washdown register was provided (R_005) and photos of washdown being undertaken (P_001; P_002; P_003). Additionally, Stone Civil provided weed hygiene checklists to confirm vehicle and mobile plant provided were not contaminated (R_006).
CBCAMP 13	Table 4 Restrict access of vehicles to areas of construction to minimise the spread or introduction of weeds or pathogens. Access restrictions will be communicated through inductions, signage and fencing where appropriate.	Pre and during construction	C	Site inspection 9 July 2019  P_003_Peet_Construction area boundary fencing_22082019  P_004_Strategen JBSG_Construction area boundary fencing_09072019	Fencing has been erected around undeveloped portions of estate therefore access has been restricted in these areas (P_003; P_004).
CBCAMP 14	Table 4 Undertake initial weed inspection in intact remnant vegetation to a distance of 100 m from the boundary of each development stage, to determine weed density and species present.	Pre-clearing of each development stage	NA	Site inspection 9 July 2019  Management advice 9 July 2019  G_001_Peet_YGE Stage 14A-Clearing Extent_21082019	No clearing adjacent to intact native vegetation was undertaken during the audit period, therefore weed inspections were not required. Weed inspection is not required at this stage, pending pre-clearing of the next stages (G_001).
CBCAMP 15	Table 4 Undertake inspection of weeds in areas of retained intact remnant vegetation and remnant vegetation within 100 m of each development stage boundary.	In the April or October of the year after clearing of a stage is completed, whichever comes first	NA	Refer to CBCAMP14	Refer to CBCAMP 14. No clearing adjacent to intact native vegetation was undertaken during the audit period, therefore weed inspections were not required.
CBCAMP 16	Table 4 Undertake manual and chemical removal of weeds if required based on the weed inspection in conservation POS with intact remnant vegetation and remnant vegetation within 100 m of each development stage boundary.	During construction	NA	Refer to CBCAMP 14	Refer to CBCAMP 14. No weed inspections or weed control has been undertaken to date within the conservation POS so this requirement has yet to be determined.

Reference	Key action	Timing	Conformance status	Evidence	Comments
CBCAMP 17	Table 4 Ensure any fill/soil brought onto site is disease free.	During construction	C	Management advice 9 July 2019	No materials have been brought on site during the audit period.
CBCAMP 18	Table 4 The works area to be maintained in a clean and tidy manner to ensure that feral and other species are not attracted to site.	During construction	C	Site inspection 9 July 2019  P_004_Strategen JBSG_Construction area boundary fencing_09072019  P_010_Strategen JBSG_Construction area_09072019	The inspection noted that the site was generally maintained to a clean and tidy standard (P_004; P_010).
CBCAMP 19	Table 5 Undertake street tree landscaping using known Carnaby's Black-Cockatoo foraging sources such that: street tree landscaping within the Project site will be planted with trees from Appendix 1, other species suitable for Carnaby's Black-Cockatoo. <i>Note performance targets are:</i> <i>"Street tree landscaping within the Project site will contain tree species from Appendix 1 (or other foraging plants for Carnaby's Cockatoo)."</i> <i>"By completion of the project, 50% of the total tree within streetscaping and POS will be CBC foraging and potential breeding species".</i>	During construction	C	D_001_LD Total_YGE Verge Tree Audit 2018-2019_16092019  C_003_Peet_Yanchep Golf Estate evidence request_16092019  R_001_Strategen_Lot 609 Yanchep Beach Road Yanchep (EPBC 2014/7126) Annual Compliance Report 2018_17092018  R_002_Strategen_Carnaby's Black Cockatoo Avoidance and Mitigation Plan_21062016	There was no street tree planting or POS planting during the audit period. Verge tree planting did occur (C_003) with a total of 21 trees installed as per species listed on street tree planting list (D_001; R_002). However, as these street trees are claimed as part of the front landscaping bonuses, they do not contribute to the 50% CBC target.  Based on planting undertaken during previous audit periods, and as per the 2018 ACR (R_001) approximately 61% of the street trees and POS trees and shrubs planted are CBC species; and therefore, the target is on track to being met.
CBCAMP 20	Table 5 Determine the quantity of plants required for particular flora species for the site, ensuring that 50% of the trees proposed to be used in streetscaping and POS areas are Carnaby's Black-Cockatoo habitat species, and: <ul style="list-style-type: none"> <li>• arrange nursery contracts for plants and/or seedling propagation if required</li> <li>• ensure the quantities of plants are available for pick-up or delivered to the contractor.</li> </ul>	During construction	C	R_001_Strategen_Lot 609 Yanchep Beach Road Yanchep (EPBC 2014/7126) Annual Compliance Report 2018_17092018  C_003_Peet_Yanchep Golf Estate evidence request_16092019	There was no street tree or POS planting undertaken during the audit period of which contributed to the 50% target (refer to CBCAMP 19, C_003). This item was assessed as compliant during the 2017/2018 audit, during which 103 plants (both trees and shrubs) and 27 trees were planted within POS and streetscapes respectively.
CBCAMP 21	Table 5 Assess potential for rabbits grazing on seedlings based on site location and local records. In the event of rabbit occurrence, undertake rabbit control and/or implement suitable deterrents.	During construction	C	Site inspection 9 July 2019  Management advice 9 July 2019	There is no evidence of any or significant rabbit infestation.

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