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## Lot 609 Yanchep Beach Road, Yanchep (EPBC 2014/7146)

### Annual Compliance Report

Prepared for  
Peet Yanchep Land Syndicate  
by Strategen

August 2016



**Lot 609 Yanchep Beach  
Road, Yanchep (EPBC  
2014/7146)**

**Annual Compliance Report**

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August 2016

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## **Client: Peet Yanchep Land Syndicate**


Report Version	Revision No.	Purpose	Strategen author/reviewer	Submitted to Client	
				Form	Date
Draft Report	A	Client review	J Mitchell	Electronic	28 June 2016
Final Draft Report	B	Client endorsement	J Mitchell	Electronic	14 July 2016
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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)

GRANT GRAMANT

Position (please print)

SENIOR DEVELOPMENT MANAGER

Organisation (please print including ABN/ACN if applicable)

PEET

Date

16 / 9 / 16



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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 *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval decision notice 2014/7146 (EPBC 2014/7146) for the Yanchep Golf Estate 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 publish annual compliance reports.

### 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 the 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 01 July 2014. The variation request included a revised Attachment A.

Another variation to EPBC 2014/7146 was approved on 8 July 2016 (outside the audit period). The variation request included a further revision to Attachment A and an amendment to condition 8 to align with the generic 'revised management plan condition' template advocated by the Department of the Environment (DotE).

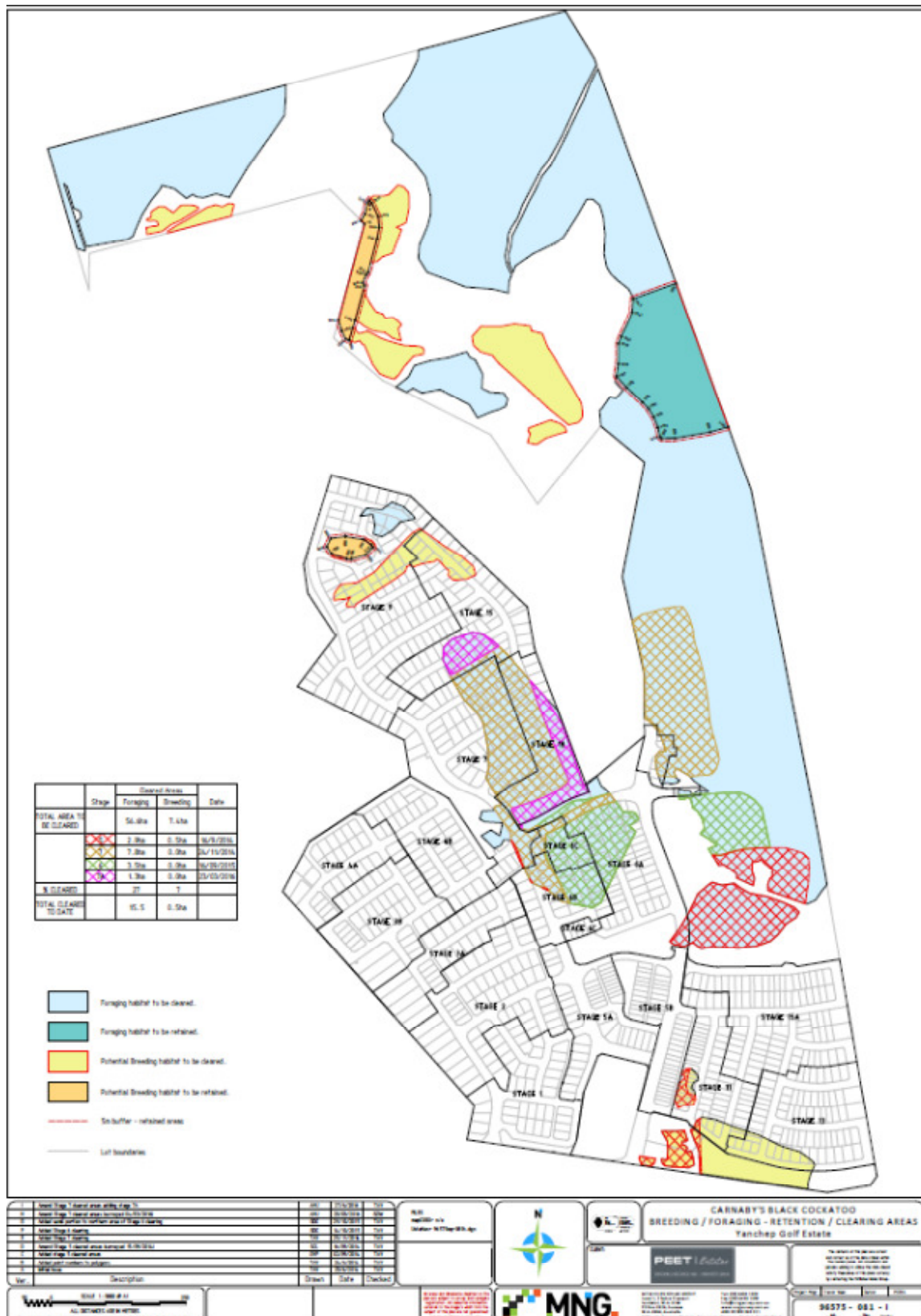


Figure 1: Yanchep Golf Estate Project – Carnaby's Black Cockatoo habitat and project staging

## **2. Current status**

Activities undertaken during the audit period (27 June 2015 to 26 June 2016) involved activities relating to Stage 6 and vegetation clearing works (Stage 7A).

### 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 2015 and 26 June 2016. The ACR addresses each condition of approval. Key management actions of the Project Carnaby's Black Cockatoo Avoidance and Mitigation Plan (CAMP) 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 June 2016 and involved a site inspection (22 June 2016), interviews with key members of the project team and a review of documentation to support the audit.

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

Table 1: Persons consulted during audit

Person and position	Organisation	Purpose
Luke Oliver Development Manager	Peet	To provide an overview of activities undertaken on site during the audit period to assess implementation and performance of EPBC 2014/7146 conditions and CBCAMP.
Kris Tilaka Assistant Development Manager	Peet	To provide an overview of activities undertaken on site during the audit period to assess implementation and performance of EPBC 2014/7146 conditions and CBCAMP.

## 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. Terminology from the DotE (2014) Annual Compliance Report Guidelines was adapted and applied in this audit.

Table 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.
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 3. 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 1. A total of 51 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 3).

Table 3: 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	I_037_MNG_Carnaby's Black Cockatoo Breeding/Foraging-Retention/Clearing Areas - Yanchep Golf Estate_27062016 C_043_EPBC 2014/7146 Lot 609 Yanchep Beach Road - request to vary conditions_02062016 C_044_Variation to conditions Lot 609 Yanchep Beach road, Yanchep WA (EPBC 2014/7146)_02062016 C_010_Cossill & Webley_FW YGE clearing update 6068_23032016 Site inspection 22 June 2016 Management advice 22 June 2016	A surveyor's drawing was provided (I_037) that shows the Carnaby's Black Cockatoo (CBC) habitat cleared to date within the project area as described in Attachment A. The drawing includes a table that shows each stage and foraging and breeding habitat cleared and the date in which clearing has taken place, with a total 15.5 ha of foraging habitat and 0.5 ha of breeding habitat respectively cleared to date since project commencement, a grand total of 20.0 ha. 4.5 ha of clearing of foraging habitat occurred in Stage 7 in the current audit period, commencing in September 2015 (I_037) with some final clearing appearing to occur March 2016 (C_010).  The auditor observed that some clearing had recently occurred along the boundary of the adjacent golf course; however, management advised the vegetation was located within the golf course site and the clearing was not related to EPBC 2014/7146, which accords with the location of trees visible from aerial photography in relation to the project boundary (e.g. Attachment A of EPBC 2014/7146).  An application to revised conditions was submitted to DoE on 2 June 2016 (C_043, C_044). The application included a proposed revision to the Attachment A to address minor amendments to the proposed location of POS areas based on changes to the overall layout and functionality of the design for the proposed urban development. The proposed amendment would result in a slight positional change to POS with no change to the areas of habitat to be retained on site.
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_036_Strategen_Lot 609 Yanchep Beach Road, Yanchep (EPBC 2014/7146) Annual Compliance Report_23092015	This requirement was reported as compliant in the 2015 ACR (R_036).
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	Refer to EPBC 2.1
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	Refer to EPBC 2.1
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_036_Strategen_Lot 609 Yanchep Beach Road, Yanchep (EPBC 2014/7146) Annual Compliance Report_23092015	This requirement was reported as compliant in the 2015 ACR (R_036).
EPBC 3.2	b) Milestones and objectives of the CBCAMP;	Prior to the commencement of the action.	C (Completed)	Refer to EPBC 3.1	Refer to EPBC 3.1 – CBCAMP approved.
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	Refer to EPBC 3.1 – CBCAMP approved.
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	Refer to EPBC 3.1 – CBCAMP approved.
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	Refer to EPBC 3.1 – CBCAMP approved.
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	Refer to EPBC 3.1 – CBCAMP approved.



Condition Number	Condition	Timing	Compliance status	Evidence	Comments
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 1	Refer to EPBC 3.1 – CBCAMP approved. Refer to Appendix 1. Of the 21 actions of the CBCAMP Peet was found to be: <ul style="list-style-type: none"> <li>conformant with 17 actions</li> <li>potentially non-conformant with 1 action.</li> </ul> The remaining 3 actions were found to be not applicable to the audit period. The potential non-conformance related to: <ul style="list-style-type: none"> <li>a requirement to undertake an initial weed inspection in conservation POS and vegetation adjacent to the Project site boundary to a distance of 100 m to determine weed density and species present - inspection has yet to be undertaken in accordance with the timing stipulated, the basis for the PNC finding (CBCAMP 14).</li> </ul> The finding on the potential non-conformance (CBCAMP 14) is particularly technical as Peet has revised the CBCAMP to address the issue to ensure it remains in conformance without affecting the intent of the plan. The proposed amendment, and associated revision to conditions, had received provisional acceptance from DotE by the close of the audit period, with only formal endorsement from the Delegate pending at that stage. This endorsement has since been provided, soon after the close of the audit period, on 8 July 2016. As Peet was found to have conformed with 17 of 18 (94%) applicable actions, and the potential non-conformances was technical and subject to later amendment and endorsement by the regulator, the auditors conclude the CBCAMP has been implemented satisfactorily in the audit period.
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_036_Strategen_Lot 609 Yanchep Beach Road, Yanchep (EPBC 2014/7146) Annual Compliance Report_23092015.	This requirement was reported as compliant in the 2015 ACR (R_036).
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 (DotE 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 (DotE 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 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.	Within three months of every 12 month anniversary 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	C_003_Strategen_EPBC 2014/7146 Lot 609 Yanchep Beach Road, Yanchep - Annual Compliance Report_25092015.	Commencement occurred on 26 June 2014, the first compliance report is due to be published 26 September 2015. The 2015 ACR was confirmed by email (C_003) on 25 September 2015, as having been published on 24 September 2015
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	C_003_Strategen_EPBC 2014/7146 Lot 609 Yanchep Beach Road, Yanchep - Annual Compliance Report_25092015.	The Department was advised by email (C_003) of the date of publication of the ACR on 25 September 2015. The email included a URL link to the ACR.
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	R_035_Peet_http://www.yanchepgolfe state.com.au/about/sustainability_2406 2016  C_003_Strategen_EPBC 2014/7146 Lot 609 Yanchep Beach Road, Yanchep - Annual Compliance Report_25092015.	The 2015 ACR was confirmed by email (C_003) on 25 September 2015, as having been published on 24 September 2015. The ACR remained available on the Peet Yanchep Golf Estate website (R_035) at the close of the 2016 audit period, 26 June 2016; confirmation the ACR has remained on the website for 12 months (24 September 2016) will need to be assessed and confirmed in the next, 2017, ACR.
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	N/A	Refer to the findings for other items in this table – no potential or actual contraventions have been identified to date.
EPBC 6.5	All contraventions must also be included in the compliance reports.	Same day the compliance report is published.	N/A	N/A	Refer to EPBC 6.1.
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	Peet advice	The Minister has not issued a directed audit notice to date.



Condition Number	Condition	Timing	Compliance status	Evidence	Comments
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	If the person taking the action wishes to carry out any activity otherwise than in accordance with the CBCAMP as specified in the conditions, the person taking the action must submit to the Department for the Minister's written approval a revised version of that CBCAMP.	Prior to undertaking any activity otherwise than in accordance with the CBCAMP.	C	C_043_EPBC 2014/7146 Lot 609 Yanchep Beach Road - request to vary conditions_02062016 C_044_Variation to conditions Lot 609 Yanchep Beach road, Yanchep WA (EPBC 2014/7146)_02062016 C_042_DotE_2014/7146 Yanchep variation notice_23062106 C_045_2014/7146 CBCAMP Revision 3_09062016 C_046_2014/7146 CBCAMP Revision 3_17062016 C_060_DotE_EPBC 2014 7146 Yanchep Approval of Variation_08072016 C_061_DotE_Lot 609 Yanchep Beach Road, Yanchep, WA (EPBC 2014/7146)_08072016 R_062_DotE_Variation to conditions attached to approval Residential Development Lot 609 Yanchep Beach Road, Yanchep, WA (EPBC 2014/7146)_08072016	In response to findings from the 2015 compliance assessment Peet submitted a revised CBCAMP to DotE on 2 June 2016, along with a request to replace this condition based on a new generic condition supported by DotE regarding revisions to management plans required by approval (C_043; C_044). The proposed revisions to the CBCAMP related to technical concerns in relation to weed inspection and management and regarding the achievement of street tree targets under the current version of the plan. DotE assessed the proposed revisions to the plan and issued a draft varied condition for approval holder agreement on 23 June 2016 (C_042), with the amended approval endorsed by the Delegate on 8 July 2016 (C_60, C_061, R_062).  This text of this condition (all parts of condition 8) will require updating as part of the next, 2017, compliance assessment.
EPBC 8.2	The varied activity shall not commence until the Minister has approved the varied CBCAMP in writing.	Prior to approval of the revised CBCAMP	C	Refer to EPBC 8.1	Refer to EPBC 8.1 and Appendix 1.
EPBC 8.3	The Minister will not approve a varied CBCAMP unless the revised CBCAMP would result in an equivalent or improved environmental outcome over time.	N/A	N/A	N/A	This condition is taken to be a note. Refer to EPBC 8.1.
EPBC 8.4	If the Minister approves the revised CBCAMP that CBCAMP must be implemented in place of the CBCAMP originally approved.	After the approval of the revised CBCAMP.	C	Refer to EPBC 8.1	Refer to EPBC 8.1 Refer to EPBC 3.7 for assessment of compliance with implementation of the CBCAMP.
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.	NA	N/A	Project commenced on the 26 June 2014, refer to EPBC 4.1.
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_036_Strategen_Lot 609 Yanchep Beach Road, Yanchep (EPBC 2014/7146) Annual Compliance Report_23092015	The CBCAMP was available on the Yanchep Golf Estate website on 1 July 2014 (R_036).
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	R_035_Peet_http://www.yanchepgolfe.state.com.au/about/sustainability_2406 2016	Refer to EPBC 10.1 - the CBCAMP was first published on the website on 1 July 2014, within one month of approval of the CBCAMP (13 June 2014). The CBCAMP remained available at the time of report preparation (R_035).

## **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 key 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**

Although the CBCAMP was found to be being implemented satisfactorily the auditors identified the following potential areas for improvement:

1. Should ensure updated GPS coordinates of areas approved to be cleared and those required to be retained are provided to contractors to address the amended POS locations (i.e. revised EPBC 2014/7146 Attachment A) as approved on 8 July 2016.
2. Ensure temporary signage is in place prior to the next stage of construction.
3. As discussed in the 2015 ACR, retain all records of liaison with the City of Wanneroo in relation to signage requirements to assist future audits and address condition 5.
4. As recommended in the 2015 ACR, ensure personnel confirm 'site specific induction conducted' when signing the induction register.
5. Amend records to unambiguously confirm that washdown occurs off-site prior to entry.

**Appendix 1**  
**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 and during construction	C	Site inspection 22 June 2016. Management advice 22 June 2016. A summary of clearing of CBC habitat that has taken place within each stage was provided (I_037), reconciled against the Project footprint, detailed in Attachment A of EPBC 2014/7146. The closest area of habitat to be retained is located approximately 200 m from to the current staging works. P_027–P_031. High construction site fencing with a padlocked gate blocks access to stage containing the retained POS nearest to current construction staging. Coloured flagging and star pickets delineating black cockatoo habitat was sighted during the site inspection (22 June 2016). Peet advised the auditors during the 2015 audit that the rope used to hold the flagging would be upgraded to a more resilient material (such as wire) as it appeared prone to damage by kangaroos (R_036). This upgrade has not occurred to date. Weekly site inspections carried out during construction include provision for checking measures to demarcate and prevent access to conservation areas (R_047–R_052). Cleared vegetation from works undertaken by the neighbouring golf club, along the boundary of the Project, had been temporarily stockpiled close to the retained POS. There is a risk that activities associated with these works will impinge on the POS and damage retained habitat trees. Peet has advised that the new kangaroo fencing has been installed, protecting the area around the POS, since the close of the audit period – this will be assessed and confirmed in the next audit period.
CBCAMP 2	Table 4 Clearly mark trees proposed to be retained on construction drawings and by coloured tape within the Project site.	Pre and during construction	C	Refer to CBCAMP 1. Weekly site inspections carried out during construction include provision to check trees to be retained are marked with coloured tape (R_047–R_052).
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 and during construction	C	Management advice 22 June 2016. GPS figures were reported to have been provided to the contractor in the previous audit period (R_036). Further recent evidence was provided that GPS coordinates of the Yanchep Golf Estate including habitat to be cleared and habitat to be retained are available and have been utilised to reconcile clearing undertaken to date following the completion of each stage (I_037). The auditor notes that Peet should ensure updated GPS coordinates are provided to contractors to address the amended POS locations as approved on 8 July 2016 (C_060, C_061, R_062).
CBCAMP 4	Table 4 Vehicles will be prohibited from accessing any vegetation areas clearly marked and signed for retention.	At all times	C	Site inspection 22 June 2016. Management advice 22 June 2016. Refer to CBCAMP 1 - the site inspection (22 June 2016) confirmed vegetation to be retained was demarcated and fenced off. The contractor confirmed by email (C_058) that the induction package relevant to EPBC 2014/7146 (R_059) was used in its site specific inductions. Weekly site inspections carried out during construction include provision to check vehicles are prohibited from accessing conservation areas (R_047–R_052).
CBCAMP 5	Table 4 Install temporary signage in accordance CoW standard signage policy to restrict construction workers from entering Carnaby's Black-Cockatoo habitat being retained in conservation POS.	Prior to and during clearing	C	Site inspection 22 June 2016. Management advice 22 June 2016. The auditors sighted signage at retained vegetation during the 2015 site inspection (R_036); however, while flagging was in place signage was not apparent during the 2016 site inspection (22 June 2016). Weekly site inspections carried out during construction include provision to check the temporary signage, indicating the signage was in place during construction works (R_047, R_052). The previous ACR had confirmed that CoW accepted the form of signage proposed – the auditors recommend that Peet ensure temporary signage is in place prior to the next stage of construction. P_027, P_031. The construction site fencing which blocks access to the area retained POS nearest to current construction staging includes signage similar to that existed on the POS boundary as observed for the 2015 ACR. As discussed in the 2015 ACR, Strategen recommends Peet continues to liaise with the CoW to ensure permanent signage is installed to identify retained vegetation in accordance with the CoW requirements, and that records of such liaison are maintained to assist future compliance reporting.
CBCAMP 6	Table 4 Ensure no domestic animals, traps or firearms permitted onsite	Ongoing	C	Site inspection 22 June 2016. Management advice 22 June 2016. The contractor confirmed by email that there were no incidents on site pertaining to domestic animals, traps or firearms on site and there was 'nothing to report in this regard' (C_038). Weekly site inspections carried out during construction include provision to check no domestic animals, traps or firearms are permitted on site (R_047, R_052). No evidence of domestic animals, traps or firearms was observed during the site visit (22 June 2016). The contractor confirmed by email (C_058) that the induction package relevant to EPBC 2014/7146 (R_059) was used in its site specific inductions. The previous ACR (C_038) included a recommendation to ensure personnel confirm 'site specific induction conducted' when signing the induction register. It was not clear from the evidence provided that this recommendation was being implemented.
CBCAMP 7	Table 4 If clearing during Carnaby's Black-Cockatoo breeding season, conduct habitat tree assessments to check for nesting hollows.	Pre-construction	C	Management advice 22 June 2016. Clearing activities and the value of habitat to be cleared (i.e. foraging or potential breeding) undertaken during the audit period included (I_037): <ul style="list-style-type: none"> <li>Stage 6 – clearing undertaken 16 September 2015 (foraging habitat only)</li> <li>Stage 7A – clearing undertaken 23 March 2016 (foraging only – i.e. outside CBC breeding season).</li> </ul> Fauna inspections, including observations of CBC were undertaken between 7-14 September 2015, with no nesting by black cockatoo species reported to be observed during the pre-clearing or clearing works (C_034). Weekly site inspections carried out during construction include provision to check this requirement (R_047–R_052), with the checklist for the week of 11 September 2015 confirming the assessment had been carried out.

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-construction	NA	Refer to CBCAMP 7.
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	Site inspection 22 June 2016. Management advice 22 June 2016. No clearing works were undertaken adjacent to conservation POS with no significant stockpiles present. Management advised that no complaints regarding dust were received in the audit period. An internal construction contractor audit provided indicated that dust suppression (dust suppression agent WT45) was in use and no visible dust was observed at the site boundary (inspection undertaken in summer when dust liftoff is expected to be at its highest levels) (R_039). Weekly site inspections carried out during construction include provision to check dust prone areas adjacent to conservation areas are stabilised (R_047–R_052). P_023, P_027–P_029. Fencing around current staging works is fitted with shade cloth material which would act as a barrier to assist dust management on site. Any exposed areas of the sandy soils characteristic of the site appear stable.
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	Site inspection 22 June 2016. Management advice 22 June 2016. Weekly site inspections carried out during construction include provision to check this requirement (R_047–R_052).
CBCAMP 11	Table 4 Induct all construction personnel in relation to dieback and weeds risk, potential impacts and management.	During construction	C	The contractor confirmed by email (C_058) that the induction package relevant to EPBC 2014/7146 (R_059) was used in its site specific inductions..
CBCAMP 12	Table 4 Make sure all vehicles; machinery and equipment are clean prior to entering site.	During construction	C	Management advice 22 June 2016. Peet provided photos of various plant and machinery being washed down (C_004– C_008). Weekly site inspections carried out during construction include provision to check this requirement (R_047–R_052). A washdown log has been maintained with eight types of plant listed, for the period 7-15 September 2016. The auditor notes that based on the photos provided and the inspection checklist the washdown location is ambiguous, and recommends that records are amended to unambiguously confirm that washdown occurs off-site prior to entry.
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 22 June 2016. Management advice 22 June 2016. Fencing to restrict access to areas not required for construction activities were observed during the site inspection component of the audit (P_023, P_027–P_029). Also refer to CBCAMP 1.
CBCAMP 14	Table 4 Undertake initial weed inspection in conservation POS and vegetation adjacent to the Project site boundary to a distance of 100 m to determine weed density and species present.	Pre-construction	PNC	Site inspection 22 June 2016. Management advice 22 June 2016. Refer CBCAMP 1 – the clearing closest to conservation POS in the audit period, in Stage 7, was more than 200 m from nearest retained POS. No weed inspection has been undertaken to date in POS or vegetation adjacent to the Project site (to a distance of 100 m). As discussed in the previous ACR (C_038) the auditors concluded the objective of the action is to undertake an initial inspection of weeds within POS and adjacent to site boundary in order to provide baseline information against which ongoing monitoring can determine if construction activities are leading to an increase in weediness. Refer to EBPC 8.1 - a revised CBCAMP was submitted on 2 June 2016, DotE assessed the proposed revisions to the plan and issued a draft varied condition (regarding revisions to the CBCAMP) for approval holder agreement on 23 June 2016 (C_042), with the amended approval endorsed by the Delegate on 8 July 2016 (C_060, C_061. R_062). As the proposed revisions were pending endorsement at the conclusion of the audit period and the weed inspections in line with this original CBCAMP action were not undertaken, the auditors have found Peet potentially non-conformant with the action, noting this finding is technical and has been remedied through the changes endorsed soon after the completion of the audit period, i.e. if Peet had been assessed under the revised and approved CBCAMP, it would have been deemed as 'Conformant' – this can be assessed and confirmed in the next audit period.
CBCAMP 15	Table 4 Undertake weed inspection in conservation POS and vegetation adjacent to the Project site boundary to a distance of 100 m.	During construction	C	Management advice 22 June 2016. Refer to CBCAMP 1 and CBCAMP 14 – the nearest clearing in audit period, in Stage 7, was more than 200 m from nearest retained POS and no baseline or ongoing weed inspection has been undertaken to date; however, is expected to be undertaken during construction as required, in line with revisions to the plan discussed above.
CBCAMP 16	Table 4 Undertake manual and chemical removal of weeds if required based on the weed inspection in conservation POS and vegetation.	During construction	NA	Refer to CBCAMP 14. No weed inspections or weed control has been undertaken to date so this requirement has yet to be determined.
CBCAMP 17	Table 4 Ensure any fill/soil brought onto site is disease free.	During construction	NA	Site inspection 22 June 2016. Management advice 22 June 2016. Peet advised no fill has been brought to site to date.

Reference	Key action	Timing	Conformance status	Evidence/ Comments
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 22 June 2016. No construction was taking place during the site inspection; however, the auditors observed that site was maintained in a clean and tidy manner (P_011-P_031). Weekly site inspections carried out during construction include provision to check this requirement (R_047–R_052).
CBCAMP 19	Table 5 Undertake street tree landscaping using known Carnaby's Black-Cockatoo foraging sources such that: <ul style="list-style-type: none"> <li>street tree landscaping within the Project site will be planted with trees from Appendix 1 or others species suitable for Carnaby's Black-Cockatoo.</li> </ul> <i>Note performance target is: "Street tree landscaping within the Project site will contain tree species from Appendix 1 (or other foraging plants for Carnaby's Cockatoo), within one year of completion of construction for each stage of the project.</i> <i>"At least 50% of street trees planted will provide habitat for Carnaby's Black-Cockatoos".</i>	During construction	C	Site inspection 22 June 2016. Management advice 22 June 2016 Refer to EPBC 8.1 – due to the previous ACR (C_038) noting that the potential to achieve the street tree target was difficult for a number of reasons so a revised CBCAMP was submitted on 2 June 2016. The revision included a proposal to include trees within both streetscapes and POS to meet the 50% CBC species target by the completion of the project. DotE assessed the proposed revisions to the plan and issued a draft varied condition (regarding revisions to the CBCAMP) for approval holder agreement on 23 June 2016 (C_042), with the amended approval endorsed by the Delegate on 8 July 2016 (C_060, C_061. R_062). Tracking data for tree planting at the site indicates that CBC habitat species are being planted across the site in both streetscapes and POS, with 58% of trees being CBC habitat species (R_054–R_056).
CBCAMP 20	Table 5 Determine the quantity of plants required for particular flora species for the site 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	Site inspection 22 June 2016. Management advice 22 June 2016 Peet advised its contractor coordinates of the street tree planting works at the Yanchep Golf Estate. R_054, R_055 and R_066, supported by auditor observation, demonstrate plants have been installed across the site – which would not have occurred without this action being implemented.
CBCAMP 21	Table 5 Assess potential for rabbits grazing on seedlings based on site location and local records. In the event of rabbit occurrence, install rabbit control guards.	During construction	C	Site inspection 22 June 2016. Management advice 22 June 2016 Management advised that no rabbits occur on site.