

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

21 September 2020

59623-132,157

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)

Olivia Hammond

Position (please print)

Senior Development Manager

Organisation (please print including ABN/ACN if applicable)

Peet Limited 56 008 665 834

Date

24 / 4 / 20

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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.

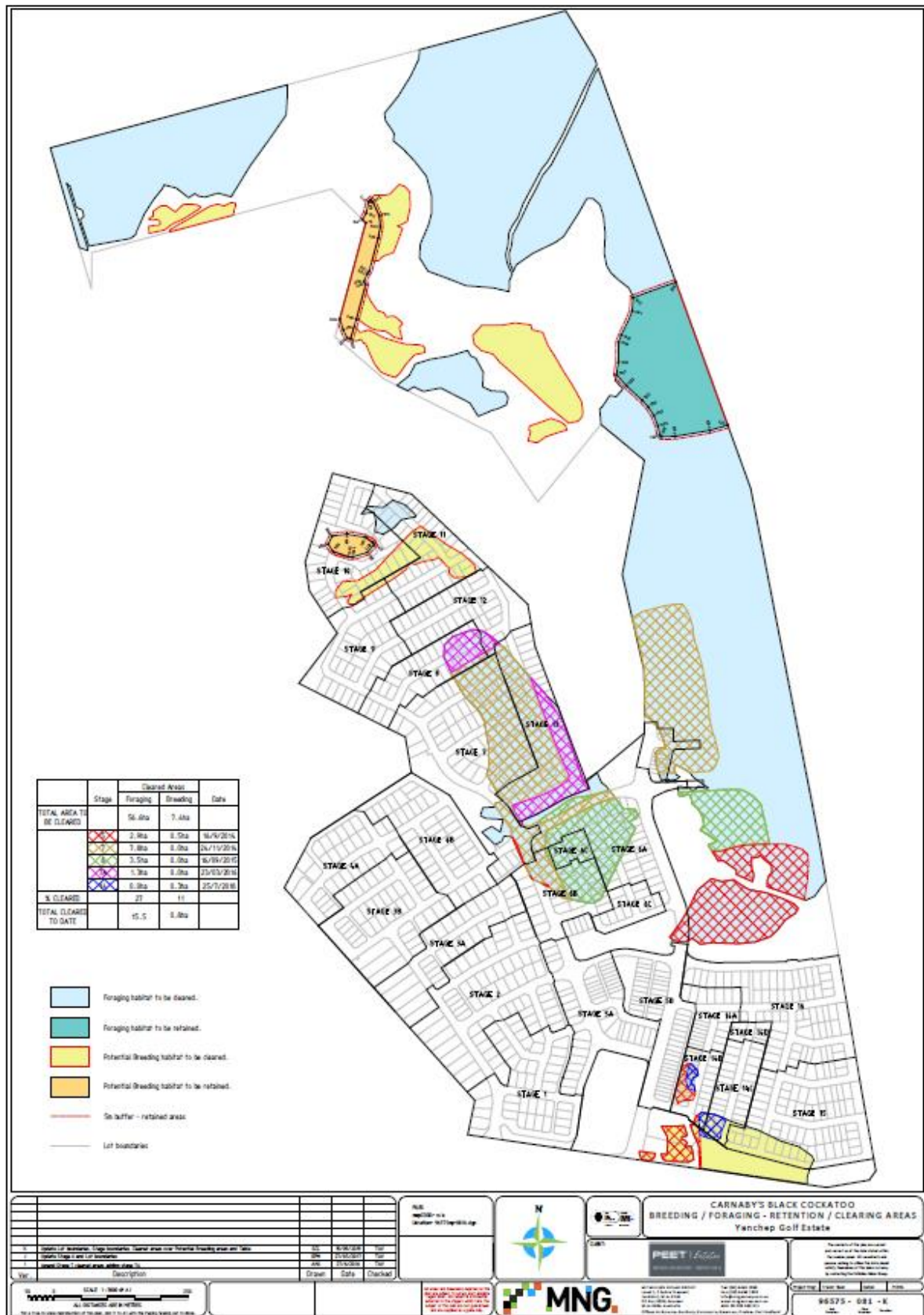


Figure 1.1: Yanchep Golf Estate Project – Carnaby's Black Cockatoo habitat and project staging

2. Current Status

Activities undertaken during the audit period (27 June 2019 to 26 June 2020) involved the following:

- No construction activities were undertaken in the reporting period;
- Maintenance of firebreak surrounding the premises;
- A firebreak variation was implemented at the request of the City of Wanneroo
- Slashing of vegetation for BAL certification for lot development.

The firebreak variation required clearing of 0.16 hectares which contained 0.009 hectares of Carnaby's Black Cockatoo (CBC) habitat.

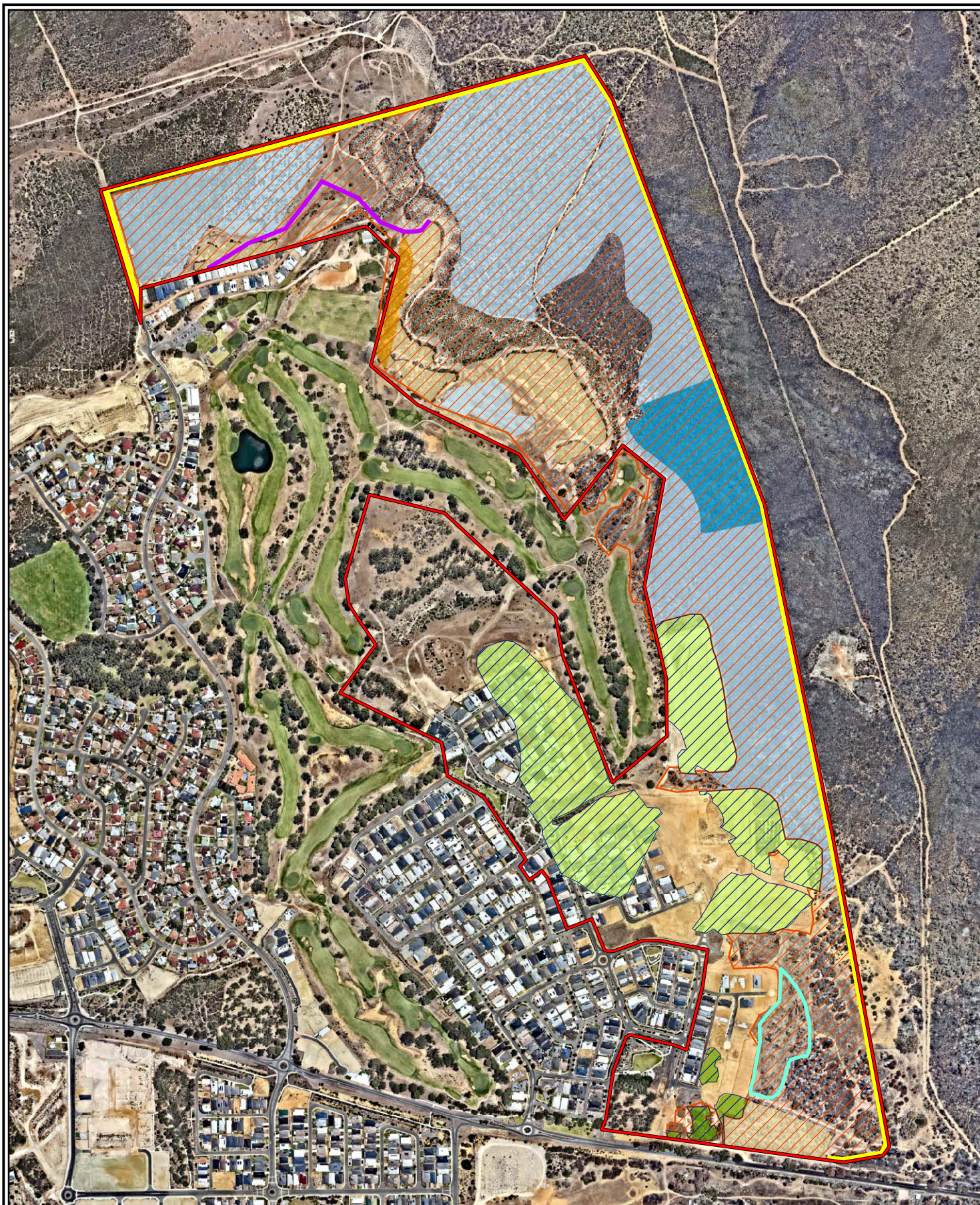
A bushfire occurred over a six-day period in December 2019 which destroyed a large majority of the CBC foraging and breeding habitat to be cleared and also retained.

A summary of the disturbance attributed to the fire scar has been retrieved from the Department of Biodiversity, Conservation and Attractions Current Bushfire Season Fire Scars (DBCA-008 <https://catalogue.data.wa.gov.au/it/dataset/dpaw-current-fire-season-fire-scars-dpaw-011>) is provided in Table 2.1 below and shown in Figure 2.1.

Table 2.1 Summary of Carnaby's Black Cockatoo habitat disturbance from 2019 bushfire

	CBCAMP Rev 6	2020 ACR		
	Total area	Total area	Area burnt	% impacted
Project site	NA	127.83	80.08	62.7
Foraging habitat to be cleared	56.6*	55.68	38.41	68.9
Foraging habitat to be retained	3.6*	4.57	4.57	100
Potential breeding habitat to be cleared	7.4	7.40	5.41	73.1
Potential breeding habitat to be retained	1.04*	0.97	0.70	72.2

*NB. There is a discrepancy between the between 2020 ACR total area figures above and those reported in Figure 3 of the Carnaby's Black Cockatoo Avoidance and Mitigation Plan (CBCAMP) Rev 6 (June 2016).



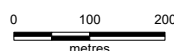
Legend

- Project site
- Footprint of fire impact (DBCA-060)
- Additional firebreak clearing (0.16 ha)
- Slashing area
- Clearing footprint to date
- Maintenance of firebreak
- Black Cockatoo habitat previously cleared
- Foraging habitat
- Potential breeding habitat

Black Cockatoo habitat impacted by fire

- Foraging habitat to be cleared (38.41 ha)
- Foraging habitat to be retained (4.57 ha)
- Potential breeding habitat to be cleared (5.41 ha)
- Potential breeding habitat to be retained (0.70 ha)

Scale 1:10,000 at A4



Coord. Sys. GDA 1994 MGA Zone 50



Job No: 59623

Client: Peet Limited

Version: A

Drawn By: hsullivan

Date: 23-Sep-2020

Checked By: CT

**Yanchep Golf Estate
WA**

**IMPACT OF FIRE ON BLACK
COCKATOO HABITAT**

FIGURE 2.1



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 2019 and 26 June 2020. 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 September to October 2020 and involved a desktop assessment of compliance against conditions where evidence was requested from the proponent to certify that the conditions were met. Emails and phone calls with key members of the project team were the main forms of communication during this 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"> Jack Wagner - Development Officer James Hansen – Assistant Development Manager 	Evidence was requested from the proponents to ensure compliance against conditions stipulated in EPBC 2014/7146 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 Department of Agriculture, Water and the Environment (DAWE), (formally known as the Department of the Environment (DoE [2014])) Annual Compliance Report Guidelines was adapted and applied in this audit (Table 3.2).

Table 3.2: Action implementation status

Status	Acronym	Description
Conditions of approval		
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.
Management Plans		

Status	Acronym	Description
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: 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	<p>PO1_Firebreak Maintenance Footprint PO2_Firebreak Maintenance Footprint (North of Premises) PO3_Slashing for BAL</p> <p>G_001_MNG_YGE Clearing Areas_20092019 G_002_CBC habitat impacted by bushfire_200220</p>	<p>Clearing of 0.16ha to implement a fire break variation occurred during the reporting period. This area had 0.009ha of foraging habitat for Carnaby's Black Cockatoo's Habitat (G_002).</p> <p>Clearing of previously cleared vegetation for BAL certification on Lots on the eastern side of the development area occurred during the reporting period (P_01).</p> <p>Clearing attributable to the project to date totals 16.3 ha of CBC habitat comprised of 15.5 ha of CBC foraging habitat and 0.8 ha of CBC breeding habitat (G_001).</p> <p>A bushfire cleared 42.98 ha of CBC foraging and 6.11 ha of CBC breeding habitat (G_002).</p> <p>To date a total of 65.39 ha of CBC habitat has either been destroyed by bushfire or cleared by the project (58.48 ha foraging and 6.91 ha breeding).</p>
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	<p>C_001_Strategen_EPBC 20147146 Peet Yanchep Condition 2_09092014.</p> <p>C_002_DPaW_EPBC 20147146 Residential development Lot 609 Yanchep Beach Road Yanchep WA_09092014</p> <p>The abovementioned correspondences were checked and audited in the 2014-2015 Annual Compliance Report.</p>	<p>An email including a letter detailing that \$160 000 was provided to the Department of Parks and Wildlife (Parks and Wildlife) for the acquisition of 315 ha of Lot 5 Mimegarra Road, Western Australia was provided to DotE by Strategen. The correspondence was provided on the 9 September 2014, within three months from the date of the approval (13 September 2014).</p> <p>In addition, Parks and Wildlife advised DotE, via email that \$160 000 was received by Peet for the acquisition and management of the offset property at Mimegarra Road. The email sighted also states that the funding is attributed to 315 ha of Lot 5 Mimegarra Road.</p> <p>No further action is required as this condition has been met.</p>
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	<p>C_001_Strategen_EPBC 20147146 Peet Yanchep Condition 2_09092014</p> <p>The abovementioned correspondences were checked and audited in the 2014-2015 Annual Compliance Report.</p>	<p>The written evidence provided to DotE (C_001) included a description of the offset site (in the letter text); a map showing the location and boundaries of the offset site (Enclosure 1) and the offset attributes (Enclosure 2).</p> <p>No further action is required as this condition has been met.</p>
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	<p>C_001_Strategen_EPBC 20147146 Peet Yanchep Condition 2_09092014.</p> <p>C_002_DPaW_EPBC 20147146 Residential development Lot 609 Yanchep Beach Road Yanchep WA_09092014</p> <p>The abovementioned correspondences were checked and audited in the 2014-2015 Annual Compliance Report.</p>	<p>Email correspondence including written evidence in the form of a letter (C_001) states that a total of 555.15 ha of Lot 5 remains unattributed to the action.</p> <p>Parks and Wildlife also provided correspondence to DotE (via email; C_002) stating that approximately 550 ha of the property remains unattributed to an action.</p> <p>No further action is required as this condition has been met.</p>
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	<p>C_045_Strategen__Peet Yanchep CBCAMP_10062014.</p> <p>C_003 DotE_(2014 7146) Final Approval Letter.</p> <p>The abovementioned correspondences were checked and audited in the 2014-2015 Annual Compliance Report.</p>	<p>The final CBCAMP was submitted on 10 June 2014, prior to the commencement of the action on 26 June 2014.</p> <p>The CBCAMP included the required map.</p> <p>A letter from the Minister's Delegate (Dr Simon Banks, Assistant Secretary) stating acceptance of the submitted CBCAMP was sighted as part of the desktop component of the audit.</p> <p>Also refer to EPBC 8.1 regarding revisions to, and approval of, the CBCAMP.</p>

Condition Number	Condition	Timing	Compliance status	Evidence	Comments
					No further action is required as this condition has been met.
EPBC 3.2	b) Milestones and objectives of the CBCAMP;	Prior to the commencement of the action.	C	Refer to EPBC 3.1	No further action is required as this condition has been met.
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	Refer to EPBC 3.1	No further action is required as this condition has been met.
EPBC 3.4	d) Timeframes for the implementation and completion of the avoidance and mitigation measures;	Prior to the commencement of the action.	C	Refer to EPBC 3.1	No further action is required as this condition has been met.
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	Refer to EPBC 3.1	No further action is required as this condition has been met.
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	Refer to EPBC 3.1	No further action is required as this condition has been met.
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.
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	C_004 Peet_Yanchep DotE letter 27 June 2014 Commencement of Works_27062014	The project commenced on 26 June 2014. Correspondence was provided to DotE on 27 June 2014, within 30 days of the commencement date.
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). Previous Annual Compliance Reports are publicly available on the Peet Website (Checked on 2/09/2020): https://www.peet.com.au/communities/perth-and-wa/yanchep-golf-estate/building-information/environmental-sustainability
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 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	R01 Yanchep Golf Estate ACR (Rev 0) C010_ 2019 Correspondence for Submission	Previous Annual Compliance Reports are publicly available on the Peet Website (Checked on 2/09/2020): https://www.peet.com.au/communities/perth-and-wa/yanchep-golf-estate/building-information/environmental-sustainability Proof of date of publication was communicated to DAWE on 26/09/2019. Evidence: C010_ 2019 Correspondence for Submission Evidence of publication for previous years were checked in previous Annual Compliance Reports.
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	Refer to EPBC 6.1	Refer to EPBC 6.1.
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 2019_17092019	Refer to the findings for other items in this table – no potential or actual contraventions have been identified to date (R_001). No potential or actual contraventions were identified in the 2019/2020 audit.
EPBC 6.5	All contraventions must also be included in the compliance reports.	Same day the compliance report is published.	N/A	R_001_Peet_Lot 609 Yanchep Beach Road, Yanchep (EPBC 2014/7146) Annual Compliance Report 2019_17092019	Refer to the findings for other items in this table – no potential or actual contraventions have been identified to date (R_001). No potential or actual contraventions were identified in the 2019/2020 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.

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	<p>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:</p> <ol style="list-style-type: none"> notify the Department in writing that the approved CBCAMP has been revised and provide the Department with: <ul style="list-style-type: none"> 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. 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	<p>C_001_DotE_PostApprovalsMonitoringSheet_09062016C_002</p> <p>C_002_DotE_PostApprovalsMonitoringSheet_17062016</p> <p>C_003_DotE_Lot 609 Yanchep Beach Road, Yanchep, WA (EPBC 2014/7046)_08072016</p> <p>The abovementioned correspondences were checked and audited in the 2016-2017 Annual Compliance Report.</p>	<p>A variation to EPBC 2014/7146 was approved on 8 July 2016 (C_003). The variation request included a further revision to Attachment A and an amendment to this condition 8 to align with the generic 'revised management plan condition' template advocated by the Department of the Environment (DotE).</p> <p>Related and other amendments to the Black Cockatoo Avoidance and Mitigation Plan (CBCAMP) required under condition 3 were also approved as part on 8 July 2016.</p> <p>Revision to the CBCAMP was not undertaken within the auditing period.</p>
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		This condition was not invoked in the audit period.
EPBC 8.3	<p>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:</p> <ol style="list-style-type: none"> Sub-condition 8 a) does not apply, or ceases to apply, in relation to the revised CBCAMP; and The person taking the action must implement the CBCAMP approved by the Minister. <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>	N/A.	N/A		The Minister did not give such notice in the audit period.
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	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	<p>C_005_Peet_Publication on the YGE website_01072014.</p> <p>The abovementioned correspondence was checked and validated in the 2014-2015 Annual Compliance Report</p>	<p>The CBCAMP was available on the Yanchep Golf Estate website on the 1 July 2014. The website was checked as part of the 2015 internal audit (11 June 2015).</p> <p>In 2016, the CBCAMP was updated. The new revised CBCAMP is available on the website (Checked on 2/09/2020): https://www.peet.com.au/communities/perth-and-wa/yanchep-golf-estate/building-information/environmental-sustainability</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

After a review of documentation (evidence) provided by Peet, the auditors concluded that all audited conditions of EPBC 2014/7146 and all 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

No recommendation for improvement was identified in the audit period.

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.

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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	N/A	No construction activities occurred within the reporting period.
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	PO1_Firebreak Maintenance Footprint PO2_Firebreak Maintenance Footprint (North of Premises) PO3_Slashing for BAL	No construction activities occurred within the reporting period. Maintenance of firebreak occurred in the reporting period where clearing occurred on previously disturbed areas with the exception of 0.16 hectares (Figure 2.1)
CBCAMP 4	Table 4 Vehicles will be prohibited from accessing any vegetation areas clearly marked and signed for retention.	Pre & during clearing	C	N/A	No construction activities occurred within the reporting period.
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	N/A	No construction activities occurred within the reporting period
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	C	N/A	Refer to CBCAMP 1
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	C	N/A	Refer to CBCAMP 1
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	N/A	Dust management was undertaken during maintenance of firebreak.
CBCAMP 10	Table 4	During construction	C	N/A	No construction activities occurred within the reporting period.

Reference	Key action	Timing	Conformance status	Evidence	Comments
	Restrict vehicle speeds to 40 km/hr to minimise dust generation on designated roads, access tracks and within construction areas adjacent to conservation POS.				
CBCAMP 11	Table 4 Induct all construction personnel in relation to dieback and weeds risk, potential impacts and management.	During construction	C	N/A	No construction activities undertaken during the audit period
CBCAMP 12	Table 4 Make sure all vehicles; machinery and equipment are clean prior to entering site.	During construction	C	N/A	No construction activities undertaken during the audit period.
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	N/A	No construction activities undertaken during the audit period
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	N/A	No clearing adjacent to intact native vegetation was undertaken during the audit period, therefore weed inspections were not required. Clearing of already disturbed areas was undertaken to maintain the firebreaks.
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	N/A	No construction activities during the reporting period
CBCAMP 17	Table 4 Ensure any fill/soil brought onto site is disease free.	During construction	C	N/A	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	N/A	No construction activities were undertaken during the audit period.
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	N/A	There was no street tree planting or POS planting during the audit period.
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"> • arrange nursery contracts for plants and/or seedling propagation if required 	During construction	C	N/A	Refer to CBCAMP 19

Reference	Key action	Timing	Conformance status	Evidence	Comments
	<ul style="list-style-type: none">ensure the quantities of plants are available for pick-up or delivered to the contractor.				
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	N/A	There is no evidence of any significant rabbit infestation.


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