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'Lakelands East' Residential Development, Mandurah, WA

Annual Compliance Report
(EPBC 2013/7048)

Prepared for
Peet Mandurah Syndicate Limited
by Strategen

April 2019

'Lakelands East' Residential Development, Mandurah, WA

Annual Compliance Report (EPBC 2013/7048)

Strategen is a trading name of
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April 2019

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Client: Peet Mandurah Syndicate Limited

Report Version	Revision No.	Purpose	Strategen author / reviewer	Submitted to Client	
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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)

Harry Doyle

Position (please print)

Assistant Development manager

Organisation (please print including ABN/ACN if applicable): PEET Mandurah Syndicate 42 062 315 673

Date

30/04/2019

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1. Introduction

This report addresses the status and compliance of implementation of the 'Lakelands East' Residential Development with the conditions in the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval 2013/7048 (EPBC 2013/7048). This report has been prepared for the purpose of meeting the requirements of condition 8 of EPBC 2013/7048, which requires the proponent to publish annual compliance reports.

1.1 Project background

Peet Mandurah Syndicate Limited (Peet) is developing the 'Lakelands East' Residential Development (Lakelands, the project) located approximately 65 km south of the Perth Central Business District.

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

The project commenced on 2 February 2015.

1.2 Environmental approval to implement the project

The project was referred to the then Department of the Environment (DotE) (now called the Department of the Environment and Energy [DEE]) for assessment under the EPBC Act in 2013. The development of Lakelands was determined a Controlled Action on 29 November 2013 due to the potential for significant impacts on listed threatened species and communities (sections 18 and 18A). The project was assessed on Preliminary Documentation and approved with conditions on the 3 December 2014 (EPBC 2013/7048).

A request to vary condition 11 of EPBC 2013/7048 was submitted on 22 January 2016, with the request approved on 9 May 2016. The variation deleted the original conditions 11 and 13 and replaced them with new conditions 11 and 13, respectively regarding revisions to, and publication of, the Revegetation Management Plan (RMP) prepared and approved under condition 3.

2. Current status

Activities undertaken during the audit period (2 February 2018 to 1 February 2019) included:

- maintained program for infill planting in revegetation areas
- continued weed control within the revegetation and landscaping areas
- completed a Significant Tree Survey in May 2018 to assess trees proposed for retention across the development area. Results were discussed with stakeholders in September 2018.

No clearing was conducted during the audit period 1 February 2018 to 2 February 2019.

3. Audit methodology

3.1 Audit plan

3.1.1 Purpose and scope

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

'Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of the RMP, over the previous 12 months, as specified in the conditions. Documentary evidence providing proof of the date of publication must be provided to the Department at the same time as the compliance report is published. The compliance reports must remain on the website for the life of the approval. All contraventions must also be included in the compliance reports. Unless otherwise agreed in writing by the Minister, the approval holder must provide a copy of each compliance report to members of the public upon request. Copies must be provided free of charge as soon as reasonably practicable but within no longer than 7 days of the request.'

This Annual Compliance Report (ACR) addresses the audit period between 2 February 2018 and 1 February 2019 for the conditions of EPBC 2013/7048 and implementation of the RMP required by conditions 3 and 4 of EPBC 2013/7048.

3.1.2 Methodology

The audit was undertaken during February and March 2019 and involved a site inspection, interviews with key members of the project team and a review of documentation to support the audit.

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

Table 1 Persons consulted during audit

Person and position	Organisation	Purpose
Harry Doyle – Assistant Development Manager	Peet	To provide an overview of activities undertaken on site during the audit period to assess implementation and performance of EPBC 2013/7048 conditions.
Alex Growden – Project Manager	Workpower	To provide an overview of activities undertaken on site during the audit period to assess implementation and performance of the RMP.
Shadra Pearson (Landscape Architect)	EPCAD Pty Ltd (Manage sub contractor HorizonWest)	To provide an overview of activities undertaken on site during the audit period to assess implementation and performance of the RMP.

3.2 Audit terminology

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

Table 2 Action implementation status

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

Source: adapted from DotE (2014)

4. Audit results

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

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

4.1 Compliance with conditions

Of 28 sub-conditions of EPBC 2013/7048:

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

4.1.1 Conformance with the Revegetation Management Plan

Of the 60 key actions identified from the RMP:

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

The 6 actions found to be potentially non-Conformant were:

- RMP 3 and 56 regarding the identification a declared weed - **Gomphocarpus fruticosus* (Narrowleaf Cottonbush) during the annual monitoring survey within the revegetation area.
- RMP 23, 40 and 60 regarding hygiene measures, where not all revegetation contractors were found to implement hygiene measures prior to entering the "revegetation areas".
- RMP 25 regarding weed control not commencing in winter.

The subjects of these potential non-conformances are repeated throughout the management document and therefore multiple non-conformances have been assessed for two of the listed issues. The auditors determined these potential non-conformances are minor and have minimal environmental impact.

It is recommended that current weed control procedures be reviewed to ensure they are effective across the revegetation and landscaping area.

Table 3: Compliance with conditions of EPBC 2013/7048

Condition Number	Condition	Compliance status	Evidence	Comments
EPBC 1.1	The approval holder must not clear any black cockatoo habitat trees outside of the project area.	Compliant.	Management advice on 11 February 2019. Site inspection on 7 February 2019. C_003_Strategen_Lakelands East Compliance Audit Clearing _ 11022019 R_001_Strategen_Lakelands East Annual Compliance Report_02052018.	Management confirmed that no black cockatoo habitat trees outside of the project area were cleared during this audit period. There was no clearing conducted during the audit period.
EPBC 2.1	The approval holder must retain no less than three hundred and three (303) black cockatoo habitat trees, including no less than one hundred and twenty (120) potential breeding trees and no less than one hundred and eighty-three (183) foraging species within the project area.	Compliant.	Management advice on 11 February 2019. Site inspection on 7 February 2019. C_003_Strategen_Lakelands East Compliance Audit Clearing _ 11022019 D_001_Strategen_Potential breeding and foraging trees_19032019	The Lakelands Significant Tree Survey was undertaken 28 May 2018 to assess trees proposed for retention across the development area. Results indicated that 295 breeding and foraging trees remained across the site.
EPBC 3.1	To compensate for the loss of black cockatoo habitat trees, within one month of the date of the approval, the approval holder must prepare and submit a Revegetation Management Plan (RMP) for the Ministers approval to revegetate within the offset site.	Compliant (completed).	R_002_Strategen_Lakelands East Black Swan Swamp Revegetation Management Plan_Rev6_22092017	This obligation has been previously assessed as Compliant (R_010). The current revised version (Rev 6) of the RMP was submitted to the DEE on 22 September 2017 and approved on 10 October 2017.
EPBC 3.2	The approval holder must not commence the action unless the Minister has approved the RMP.	Compliant (completed).	R_002_Strategen_Lakelands East Black Swan Swamp Revegetation Management Plan_Rev6_22092017	This obligation has been previously assessed as Compliant (R_010).

Condition Number	Condition	Compliance status	Evidence	Comments
EPBC 3.3	<p>The RMP must include, but may not be limited to:</p> <ul style="list-style-type: none"> a. Objectives of the RMP; b. Location, condition, size and suitability of the revegetation areas within the offset site; c. Detailed information on each stage of the revegetation project; d. Black cockatoo tree and shrub species to be utilised, source of plant stock, stocking rates (at least six thousand two hundred (6200) tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species), planting method and schedule; e. Preventative management actions that will be implemented to manage weeds, feral animals and anthropogenic activities, within the offset site prior to, during and post planting; f. Revegetation success criteria (that 3 years from the date of planting the approval holder must achieve a minimum of 80 percent survival rate of the planted potential breeding species and 80 percent survival rate of the planted foraging species), and detailed response measures and corrective actions should success criteria not be met; g. Monitoring program, including the type, timing and frequency of monitoring; h. Responsibilities for planning, implementing, management, reporting and monitoring the RMP; i. Timeframes for the implementation of each stage of the RMP; j. Details on the conservation mechanism to protect and conserve the offset site. 	Compliant	R002_Strategen_Lakelands East Black Swan Swamp Revegetation Management Plan_Rev6_22092017	The approved RMP Rev 6 (R_002) includes the required details.
EPBC 4.1	If the Minister approves the RMP, then the approval holder must implement the approved RMP.	Compliant	Refer to Appendix 1.	<p>The RMP has been implemented across the Project during the period. Refer to Appendix 1 for further information</p> <p>Of 60 key actions identified from the RMP:</p> <ul style="list-style-type: none"> • 4 were found to be 'Potentially non-Conformant.' • 46 were found to be 'Conformant.', of which 2 were identified as 'Conformant (completed)'. • 10 were found to be 'Not applicable'.

Condition Number	Condition	Compliance status	Evidence	Comments
EPBC 5.1	<p>To avoid and mitigate impacts to black cockatoos, if clearing is to be undertaken during the breeding season (July - November), within 7 days prior to clearing, the approval holder must ensure all potential nesting trees within the project area are investigated to detect the presence of black cockatoos using hollows. The investigation must be undertaken by a suitably qualified and experienced person.</p> <p>If any black cockatoos are detected using a hollow in a tree or trees, the approval holder must:</p> <ul style="list-style-type: none"> i. Clearly identify all such trees with fencing and signage that must be located within two (2) metres of the base of each such tree; ii. not clear any such tree of any vegetation within 10 metres of any such tree; and iii. undertake all reasonable measures to avoid any such tree from being cut down, felled, removed, killed, destroyed, poisoned, ring-barked, uprooted or burned until a suitably qualified and experienced person has verified in writing that the hollow/s in each such tree are no longer used by black cockatoos. 	Compliant	<p>Management advice on 11 February 2019.</p> <p>Site inspection on 7 February 2019.</p> <p>D_001_Strategen_Potential breeding and foraging trees_19032019</p>	Management confirmed that no clearing, including that of habitat trees took place during the reporting period.
EPBC 6.1	Within 30 days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.	Compliant (completed)	R_001_Strategen_Lakelands East Annual Compliance Report_02052018.	This obligation has been previously assessed as Compliant (R_001).
EPBC 7.1	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the RMP, required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the Environment Protection and Biodiversity Conservation Act 1999, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	Compliant	This audit report and evidence register substantiates that this condition has been complied with.	<p>Peet has provided the auditors with records substantiating all activities associated with or relevant to the conditions of approval for all applicable conditions and requirements in the RMP.</p> <p>There was no request received from the Department during the audit period.</p>

Condition Number	Condition	Compliance status	Evidence	Comments
EPBC 8.1	Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of the RMP, over the previous 12 months, as specified in the conditions.	Compliant	W_001_Peet_Website 2018 ACR_11022019. W_002_Peet_Website Lakelands East. documents_14022019 https://www.peet.com.au/communities/perth-and-wa/lakelands-estate/purchaser_builder-information/environmental-sustainability	The ACR for the audit period (2 February 2017 to 1 February 2018) was available on Peet's website on 2 May 2018.
EPBC 8.2	Documentary evidence providing proof of the date of publication must be provided to the Department at the same time as the compliance report is published.	Compliant	R003_Strategen_Email to DEE 2018 ACR website upload screen shot_02052018	Documentary evidence detailing the date of publication of the 2018 ACR on the Peet website was provided to the Department's Post Approvals team on 2 May 2018.
EPBC 8.3	The compliance reports must remain on the website for the life of the approval.	Compliant	W_002_Peet_Website Lakelands East. documents_14022019 W_003_Peet_Website 2016 ACR - incorrect title_14022019 https://www.peet.com.au/communities/perth-and-wa/lakelands-estate/purchaser_builder-information/environmental-sustainability	The ACR for the audit periods 2016-2017 and 2017-2018 were available online. The ACR for the audit period 2015 – 2016 is available on the Peet website, however was available under the 'Lakelands East Revegetation Management Plan' title when accessed on 14 February 2019.
EPBC 8.4	All contraventions must also be included in the compliance reports.	Compliant	W_002_Peet_Website Lakelands East. documents_14022019 https://www.peet.com.au/communities/perth-and-wa/lakelands-estate/purchaser_builder-information/environmental-sustainability .	Contraventions have been included within the compliance reports published on the Peet website. In the 2016 to 2017 ACR, no potential non-compliances with conditions of EPBC 2013/7048 were identified; and, two potential non-conformances with the requirements of the RMP were reported. In the 2017 to 2018 ACR, one potential non-compliance with conditions of EPBC 2013/7048 was identified; and eight potential non-conformances with the requirements of the RMP were reported.
EPBC 8.5	Unless otherwise agreed to in writing by the Minister, the approval holder must provide a copy of each compliance report to members of the public upon request. Copies must be provided free of charge as soon as reasonably practicable but within no longer than 7 days of the request.	Not applicable	Management advice on 26 March 2019. W_002_Peet_Website Lakelands East. documents_14022019 https://www.peet.com.au/communities/perth-and-wa/lakelands-estate/purchaser_builder-information/environmental-sustainability .	The 2017 and 2018 ACR documents are publicly available through the Peet website. Management advised it had not received any specific request from members of the public for an ACR.

Condition Number	Condition	Compliance status	Evidence	Comments
EPBC 9.1	Potential or actual contraventions of the conditions of the approval must be reported to the Department in writing within 2 business days of the approval holder becoming aware of the actual or potential contravention.	Compliant	C_002_Strategen_Notice of EPBC Act Approval 2013_7048 2018 ACR_02052018 R_001_Strategen_Lakelands East Annual Compliance Report_02052018.	One potential non-compliance was identified in the 2017/2018 ACR submitted to the DEE 2 May 2018. The potential non-compliance was with condition 13.2 of the EPBC 2013/7048 approval, which identified the revised Revegetation Management Plan (RMP; accepted by the DEE on 10 October 2017) was published on Peet's website on 23 January 2018, and therefore, it was beyond the 1-month timeframe for the RMP to be published on Peet's website. The auditors determined that this potential non-compliance is an administrative technicality and has no material environmental impact.
EPBC 10.1	Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister.	Not applicable	Management advice on 26 March 2019.	Management advised that they had not received any such direction from the Minister to conduct an independent audit.
EPBC 10.2	The independent auditor must be approved by the Minister prior to the commencement of the audit.	Not applicable	Refer to EPBC 10.1.	Refer to EPBC 10.1.
EPBC 10.3	Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	Not applicable	Refer to EPBC 10.1.	Refer to EPBC 10.1.
EPBC 11.1	The approval holder may choose to revise the RMP approved by the Minister under condition 3 without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised RMP would not be likely to have a new or increased impact.	Compliant	R_002_Strategen_Lakelands East Black Swan Swamp Revegetation Management Plan_Rev6_22092017	No changes were made to the RMP (Rev 6) during the reporting period.
EPBC 11.2	If the approval holder makes this choice it must: i. notify the Department in writing that the approved RMP has been revised and provide the Department with an electronic copy of the revised RMP; ii. implement the revised RMP from the date that the plan is submitted to the Department; and iii. for the life of this approval, maintain a record of the reasons the approval holder considers that taking the action in accordance with the revised RMP would not be likely to have a new or increased impact.	Compliant	Refer to EPBC 11.1.	Refer to EPBC 11.1.
EPBC 11.3	11A. The approval holder may revoke its choice under condition 11 at any time by notice to the Department. If the approval holder revokes the choice to implement the revised RMP, without approval under section 143A of the Act, the RMP approved by the Minister must be implemented.	Not applicable	Refer to EPBC 11.1.	Refer to EPBC 11.1.

Condition Number	Condition	Compliance status	Evidence	Comments
EPBC 11.4	11B. Condition 11 does not apply if the revisions to the approved RMP include changes to matters listed under condition 3 j, unless otherwise agreed in writing by the Minister. This does not otherwise limit the circumstances in which the taking of the action in accordance with a revised RMP would, or would not, be likely to have new or increased impacts.	Compliant	Refer to EPBC 11.1.	Refer to EPBC 11.1.
EPBC 11.5	11C. If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised RMP would be likely to have a new or increased impact, then: i. Condition 11 does not apply, or ceases to apply, in relation to the revised RMP; and ii. The approval holder must implement the RMP approved by the Minister. To avoid any doubt, this condition does not affect any operation of conditions 11, 11A and 11B in the period before the day the notice is given. At the time of giving the notice the Minister may also notify that for a specified period of time condition 11 does not apply for the RMP required under the approval.	Compliant	Refer to EPBC 11.1.	Refer to EPBC 11.1.
EPBC 11.6	11D. Conditions 11, 11A, 11B and 11C are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised RMP to the Minister for approval.	Not applicable	This is taken to be a note and therefore, not assessable.	This is taken to be a note and therefore, not assessable.
EPBC 12.1	If the Minister believes that it is necessary or convenient for the better protection of listed threatened species and communities to do so, the Minister may request that the approval holder make specified revisions to the RMP specified in the conditions and submit the revised RMP for the Minister's written approval. The approval holder must comply with any such request.	Not applicable	Management advice on 26 March 2019.	Management advised that no such request from the Minister has been received.
EPBC 12.2	The revised approved RMP must be implemented. Unless the Minister has approved the revised RMP, then the approval holder must continue to implement the RMP previously approved, as specified in the conditions.	Compliant	Refer to EPBC 11.1.	Refer to EPBC 11.1. Revision 6 of the RMP was implemented during the audit period.

Condition Number	Condition	Compliance status	Evidence	Comments
EPBC 13.1	Unless otherwise agreed to in writing by the Minister, the approval holder must publish the revised RMP on its website.	Compliant	W_002_Peet_Website Lakelands East. documents_14022019 https://www.peet.com.au/communities/perth-and-wa/lakelands-estate/purchaser_builder-information/environmental-sustainability .	The current version (Rev 6) of the RMP was identified on the Peet website, when accessed on 14 February 2019.
EPBC 13.2	The revised RMP must be published on that website within 1 month of being approved or submitted under condition 11 i. and remain published for the life of the approval.	Compliant	W_002_Peet_Website Lakelands East. documents_14022019 https://www.peet.com.au/communities/perth-and-wa/lakelands-estate/purchaser_builder-information/environmental-sustainability .	Refer to EPBC 13.1 The RMP was not revised or re-approved during the audit period.

5. References

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

Appendix 1
Audit of implementation of the
Revegetation Management Plan

Revegetation Management Plan audit table

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 1	<p>Section 3.1 Revegetation objectives and scope</p> <p>Revegetation will occur within two specified areas (revegetation areas and landscaping areas in the offset site) as displayed in Figure 1.</p>	During revegetation	Conformant.	<p>Site inspection 7 February 2019.</p> <p>R_007_WorkPower_Invoice for plant supply revegetation area_31072018</p> <p>R_012_Workpower_2015_16 Seed Collection and Seedling Summary Report</p> <p>P_002_Strategen_Evidence of guards in revegetation area_07032019</p>	<p>Revegetation planting commenced in the area specified in 2016. Landscaping works involving revegetation were completed in July 2017. Infill planting was undertaken within the revegetation areas during the reporting period from the 9-10 July 2018.</p>
RMP 2	<p>Section 3.1 Revegetation objectives and scope</p> <p>Planting of 6200 tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species will occur within "revegetation areas" totalling a maximum of 9.14 ha in size and areas intended for managed landscaping (landscaping areas) totalling 1.23 ha within the total offset site (10.8 ha).</p>	Refer to RMP 7.	Conformant.	<p>R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019..</p> <p>R_007_WorkPower_Invoice for plant supply revegetation area_31072018</p> <p>R_012_Workpower_2015_16 Seed Collection and Seedling Summary Report</p> <p>P_002_Strategen_Evidence of guards in revegetation area_07032019</p>	<p>The contractor responsible for vegetation and weed management within the revegetation area – Workpower completed infill planting on 9 and 10 July 2018 with the following species planted:</p> <ul style="list-style-type: none"> • <i>Acacia saligna</i> • <i>Allocasuarina fraseriana</i> • <i>Banksia attenuate</i> • <i>Banksia menziesii</i> • <i>Eucalyptus rudis</i> • <i>Jacksonia furcellata</i> <p>These species have been defined as potential breeding or foraging species for black cockatoos.</p> <p>This requirement was assessed as compliant in the 2016, 2017 and 2018 ACR, which identified that revegetation using 6200 breeding and foraging species as defined in the EPBC 2013/7048 approval occurred in 2016.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 3	<p>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</p> <ul style="list-style-type: none"> No greater than 10% weed cover No Declared Plants or weeds of national environmental significance. 	At completion.	Potentially Non-Conformant.	<p>Site inspection 7 February 2019.</p> <p>R_002_Strategen_Lakelands East Black Swan Swamp Revegetation Management Plan_Rev6_22092017</p> <p>R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.</p> <p>R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019</p> <p>R_013_Strategen_Lakelands East Landscape monitoring memo_Rev A_21032019P_003_Strategen_Evidence of weeds along the pedestrian path_070319</p> <p>P_004_Strategen_Evidence of weed control_070319</p>	<p>Weeds were observed throughout the revegetation area during the audit. *<i>Conyza bonariensis Cronquist</i> (Flaxleaf Fleabane) was the predominant weed identified along the pedestrian footpath and around seedlings.</p> <p>The Annual Revegetation Monitoring Survey undertaken in September 2018 (R_006) identified that monitoring quadrants 1,4 and 6 were not meeting criteria of no greater than 10% weed cover.</p> <ul style="list-style-type: none"> Quadrants 1 and 6 recorded 10-15% weed cover. Quadrant 4 recorded weed cover of 70% <p>A declared weed - *<i>Gomphocarpus fruticosus</i> (Narrowleaf Cottonbush) was identified in Quadrant 4. This species is listed as a declared pest species in Western Australia.</p> <p>Records (R_004 and R_006) indicate weed control was undertaken throughout this audit period. However, the presence of weeds identified during the annual monitoring survey of the revegetation and landscaping areas, and the site inspection demonstrate that this weed control has not been effective in managing weeds on site.</p> <p>It is recommended that</p> <ul style="list-style-type: none"> Weed monitoring is conducted in the revegetation area to assess if the weed control conducted in October 2018 was effective in eradicating the declared weed species. Weed spraying is conducted more frequently throughout the audit period.
RMP 4	<p>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</p> <p>Implement contingency measures as outlined in section 6 if grazing is observed on planted seedlings.</p>	At completion.	Conformant.	<p>Site inspection on 7 February 2019.</p> <p>R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019</p> <p>P_001_Strategen_Evidence of grazing_070220019</p> <p>P_002_Strategen_Evidence of guards in revegetation area_07032019</p>	<p>Minimal grazing and other damage to planted seedlings were observed during the site inspection and annual monitoring survey (R_006).</p> <p>Corflute guards have been used within the revegetation and landscaping areas for the protection of seedlings (P_002).</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 5	<p>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</p> <p>Establish local provenance species as detailed in Table 6 through seedling planting.</p> <p>Table 6:</p> <p><i>Acacia saligna, Allocasuarina fraseriana, Banksia attenuata, Banksia baxteri, Banksia coccinea, Banksia hookeriana, Banksia nivea, Banksia sessilis, Corymbia calophylla, Corymbia ficifolia, Eremophila glabra, Eucalyptus marginata, Eucalyptus gomphocephala, Eucalyptus preissiana, Eucalyptus rudis, Grevillea bipinnatifida, Grevillea paniculata, Grevillea wilsonii, Hakea amplexicaulis.</i></p>	At completion.	Conformant. (completed).	R_012_Workpower_2015_16 Seed Collection and Seedling Summary Report	This item was deemed completed in the previous audit report (R_001)
RMP 6	<p>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</p> <p>Ensure management actions as detailed in section 4 are complied with.</p>	Refer to item 17–23.	Not applicable.	Refer to item 17–23.	Refer to items 10-15
RMP 7	<p>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</p> <p>Plant a minimum of 6200 tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species of local within the 10.8 ha offset site.</p>	At completion.	Conformant.	Refer to RMP 2.	Refer to RMP 2.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 8	<p>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</p> <p>Achieved 80% survival of planted potential breeding species and 80% survival of planted foraging species within the offset site ten years from the planting completion date.</p>	At completion.	Not applicable.	<p>R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.</p> <p>R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019</p> <p>R_007_WorkPower_Invoice for plant supply revegetation area_31072018</p>	<p>Infill planting is being conducted by the revegetation contractor to work towards the 80% survival rate completion criteria.</p> <p>R_006 indicates that the target rate for survival of planted breeding and foraging species is currently meeting the criterion for 80% survival.</p> <p>Completion criteria is not required to be achieved until 30 July 2026 as this is ten years since the original 6200 plants were planted.</p>
RMP 9	<p>Section 4.1.1 Revegetation areas</p> <p>Seedlings will be propagated in an accredited nursery from seed collected from within a 50 km radius of the revegetation site. This radius may need to be extended if the relevant local government have restrictions on seed collection at the time seed collection is required.</p>	Prior to revegetation activities taking place.	Conformant.	<p>R_007_WorkPower_Invoice for plant supply revegetation area_31072018</p> <p>R_008_Workpower_NIASA Workpower Wholesale Nursery_2018</p> <p>R_009_Workpower_NIASA Workpower Wholesale Nursery_2017</p> <p>R_010_Workpower_NIASA Workpower Wholesale Nursery_2016</p>	<p>Assessment of this item in the 2016 to 2018 ACR is still applicable to this audit period which identified:</p> <p><i>Seed collected in 2012-2015, used for the "revegetation areas" has come from local provenance collected within a 50 km radius of the revegetation site.</i></p> <p>Workpower completed infill planting between 9-10 July 2018. Workpower maintain a NIASA accredited wholesale nursery, with seedlings used for infill in the revegetation areas.</p> <p>Refer RMP 34</p>
RMP 10	<p>Table 3: Management actions (revegetation areas)</p> <p>Undertake a site inspection to identify the weed species, locations and abundance within revegetation areas.</p>	Prior to revegetation activities taking place.	Conformant.	R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019	<p>A site inspection of the revegetation areas was undertaken on 18 September 2018 (R_006), which identified weed species and a declared weed species.</p> <p>Site inspections are undertaken by a contractor (Workpower) prior to revegetation being undertaken. During the reporting period one infill planting event took place.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 11	<p>Table 3: Management actions (revegetation areas)</p> <p>Undertake weed control (as described in section 4.2) at the revegetation areas based on the results of the site inspection at least twice prior to commencing revegetation activities.</p>	Prior to seedling planting taking place in accordance with chemical specifications.	Conformant.	<p>R_002_Strategen_Lakelands East Black Swan Swamp Revegetation Management Plan_Rev6_22092017.</p> <p>R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.</p>	<p>Peet's revegetation area contractor, Workpower, undertook revegetation (infill planting) activities in July 2018. Weed control was undertaken prior to this in April 2018. Weed control was also undertaken in October 2018.</p> <p>The Annual Black Swan Swamp Revegetation Monitoring Survey was undertaken in September 2018 and indicated that weeds (including a declared pest species in Western Australia) are present in the revegetation areas. It is recommended that more frequent weed control be undertaken.</p>
RMP 12	<p>Table 3: Management actions (revegetation areas)</p> <p>Undertake seedling planting as described in Section 4.3.</p>	After the completion of initial weed control.	Conformant.	<p>R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.</p> <p>Refer to RMP 2, RMP 32</p>	Infill planting was undertaken west of Black Swan Lake on 9-10 July 2018, Refer to RMP 2, RMP 28 – 37.
RMP 13	<p>Table 3: Management actions (revegetation areas)</p> <p>Install a minimum of three stakes and a protective guard around each seedling to provide micro-climate control and protect the vegetation from grazing by feral and native herbivorous animals (i.e. rabbits and kangaroos) and wind damage.</p>	After seedling planting.	Conformant.	<p>P_005_Strategen_Evidence of corflute tree guards reveg_07022019</p> <p>P_006_Strategen_Evidence of corflute tree guards reveg_07022019</p> <p>F_001_Workpower_Invoice for tree guard maintenance_ES10840_21032018</p> <p>Refer to RMP 4.</p>	<p>Tree guards were observed throughout the revegetation area. Guards included those with three stakes and corflute – the latter being more prominent as they offer better results for damage caused by fauna.</p> <p>Refer to RMP 4.</p> <p>Minimal grazing was observed at the time of the site inspection on 7 February 2019.</p>
RMP 14	<p>Table 3: Management actions (revegetation areas)</p> <p>Ensure all plants and other materials used in revegetation are free of dieback and weeds.</p>	Prior to revegetation activities taking place.	Conformant.	<p>Refer RMP 9</p> <p>R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.</p>	<p>Refer RMP 9</p> <p>Peet's revegetation area contractor, Workpower, ensured plants used for infill were free from dieback and weeds.</p>
RMP 15	<p>Table 3: Management actions (revegetation areas)</p> <p>Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering revegetation areas.</p>	At all times.	Conformant.	<p>R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.</p>	Weed contractor, Workpower's pre-start hygiene inspection register has been provided, indicating hygiene measures have been undertaken.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 16	<p>Section 4.1.2 Landscaping area</p> <p>Seedlings will be propagated in an accredited nursery from seed collected from within a 50 km radius of the revegetation site. This radius may need to be extended if the relevant local government have restrictions on seed collection at the time seed collection is required.</p>	Prior to revegetation activities taking place.	Not Applicable	<p>Site inspection 7 February 2019.</p> <p>C_001_EPCAD_Correspondence RE planting landscaping area_07032019.</p> <p>R_013_Strategen_Lakelands East Landscape monitoring memo_Rev A_21032019</p> <p>P_008_Strategen_Evidence of corflute tree guards landscape_07022019</p> <p>P_009_Strategen_Evidence of corflute tree guards landscape_07022019</p>	<p>Planting of seedlings within the landscaping area was last conducted in July 2017.</p> <p>These seedlings were observed during the annual monitoring event in September and site inspection on the 7 February 2019.</p>
RMP 17	<p>Table 4: Management actions (landscaping areas in the offset site)</p> <p>Undertake a site inspection to identify the weed species, locations and abundance within the landscaping areas.</p>	Prior to revegetation activities taking place.	Conformant.	R_005_Horizonwest_Black Swan Lake weed spray schedule landscaping area_14032019	Peet's landscaping area vegetation and weed control Contractor Horizon West undertook regular weed control of the vegetation area throughout the reporting period. Horizon West maintained a Chemical Application Record Sheet (R_005).
RMP 18	<p>Table 4: Management actions (landscaping areas in the offset site)</p> <p>Undertake weed control (as described in section 4.1.2) at the landscaping areas based on the results of the site inspection at least twice prior to commencing revegetation activities.</p>	Prior to seedling planting taking place in accordance with chemical specifications.	Conformant.	Refer to RMP 17.	Refer to RMP 17.
RMP 19	<p>Table 4: Management actions (landscaping areas in the offset site)</p> <p>Undertake ongoing maintenance weed control as described in section 4.1.2.</p>	Biannually (as necessary) until responsibility of managing the revegetation site is transferred to City of Mandurah.	Conformant.	<p>Site inspection on 7 February 2019.</p> <p>P_007_Strategen_Evidence of weed control landscaping area_07022019</p>	<p>During the site inspection, the landscaping areas were observed to have minimal weed species. Of the weed species present, it was identified that weed control activities had been undertaken (by Horizon West) as the weeds were observed to be dying.</p> <p>Note: the condition states 'section 4.1.2'. However, it should state 'section 4.2'</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 20	<p>Table 4: Management actions (landscaping areas in the offset site)</p> <p>Undertake seedling planting as described in Section 4.3.</p>	After the completion of initial weed control.	Not Applicable	Refer RMP 16	Refer RMP 16
RMP 21	<p>Table 4: Management actions (landscaping areas in the offset site)</p> <p>Install a minimum of three stakes and a protective guard around each seedling to provide micro-climate control and protect the vegetation from grazing by feral and native herbivorous animals (i.e. rabbits and kangaroos) and wind damage.</p>	After seedling planting.	Conformant.	Site inspection 7 February 2019. Refer to RMP 4.	<p>Tree guards were observed throughout the landscaping area. Guards included those with three stakes and corflute – the latter being more prominent as they offer better results for damage caused by fauna.</p> <p>Grazing was not observed at the time of the site inspection on 7 February 20019.</p> <p>Refer to RMP 4.</p>
RMP 22	<p>Table 4: Management actions (landscaping areas in the offset site)</p> <p>Ensure all plants and other materials used in revegetation are free of dieback and weeds.</p>	Prior to revegetation activities taking place.	Not Applicable	Refer RMP 16	Refer RMP 16
RMP 23	<p>Table 4: Management actions (landscaping areas in the offset site)</p> <p>Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering landscaping areas.</p>	At all times.	Potentially Non-Conformant.	R_005_Horizonwest_Black Swan Lake weed spray schedule landscaping area_14032019	<p>Horizon West were not able to provide evidence that personnel implemented dieback or clean on entry procedures.</p> <p>Therefore, the auditors have assessed this item to be potentially non-conformant. It is recommended that Horizon West implement a site hygiene inspection procedure, including the use of a sign on sheet.</p> <p>Refer RMP 40</p>
RMP 24	<p>Section 4.2</p> <p>Weed control techniques will comprise of chemical controls identified in Table 5</p> <p>Table 5:</p> <ul style="list-style-type: none"> Initial broad scale spray herbicide application (using towed boom spray rigs) Spot spray herbicide application Stem injection, cut and paint. 	At all times.	Conformant.	<p>R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.</p> <p>F_002_Workpower_Invoice for weed control_ES10860_24042018</p> <p>F_003_Workpower_Invoice for weed control_ES10996_31102018</p> <p>R_005_Horizonwest_Black Swan Lake weed spray schedule landscaping area_14032019</p>	<p>Workpower conducted weed control activities via 4WD mounted glyphosate twin spray unit with two operators within the revegetation area.</p> <p>Horizon West conducted spot spraying of weeds within the landscaping area during the reporting period.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 25	Section 4.2 Weed control will commence in winter, prior to revegetation activities commencing. This will be in the form of a broad scale weed spray over the revegetation site to reduce initial weed loads prior to planting.	Prior to revegetation activities taking place.	Potentially Non-Conformant.	R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.	Revegetation – infill planting was undertaken in the revegetation area in July 2018. Weed control was undertaken by the contractor prior to this in April and after planting in October, not in winter as required. It is recommended that the RMP be reviewed to reflect optimum timing for weed control
RMP 26	Section 4.2 Follow up weed control activities will be in the form of spot spraying around planted seedlings. Weed control post planting will be focussed on the immediate areas surrounding planted seedlings (e.g. 1 m radius around planted seedlings).	After seedling planting.	Conformant.	Refer to RMP 11.	Refer to RMP 11.
RMP 27	Section 4.2 Weed control will be undertaken by Peet until handover of management to the site to the City of Mandurah.	Until handover of management to the site to the City of Mandurah.	Conformant.	Refer to RMP 24.	Refer to RMP 24. Weed control has been undertaken by Peet to date. Handover to the City of Mandurah is anticipated to be during the next reporting period.
RMP 28	Section 4.3 Plants used in revegetation activities will be propagated from native seed collected from the local area. Seed will be collected from a 50 km radius from the revegetation site by licensed seed collectors.	Refer to RMP 9.	Conformant.	Refer to RMP 9 and RMP 16.	Refer to RMP 9.
RMP 29	Section 4.3 Only species defined within EPBC 2013/7048 as potential breeding or foraging species for black cockatoos (Tuart, Marri, Jarrah, <i>Acacia saligna</i> , <i>Banksia attenuata</i> , <i>Banksia grandis</i> , <i>Banksia menziesii</i> and <i>Allocasuarina fraseriana</i> species) will be considered as part of the 6200 plants that are required to be planted.	At all times.	Conformant. (completed).	R_012_Workpower_2015_16 Seed Collection and Seedling Summary Report.	The species of all the 6200 seedlings planted are as per the defined list.
RMP 30	Section 4.3 Seed collection will be undertaken in late-spring to summer of the year preceding planting activities.	Late-spring to summer of the year preceding planting activities.	Conformant. (completed).	R_001_Strategen_Lakelands East Annual Compliance Report_02052018.	This obligation was reported as conformant in the previous ACR.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 31	Section 4.3 Due to the nature of the revegetation site (i.e. overstorey species and limited good quality topsoil), habitat creation will be focussed on seedling planting rather than direct seeding to maximise potential for revegetation success. As a result, no initial site works (e.g. ripping, scarifying or topsoil transfer) will be required.	During seedling planting.	Conformant.	Refer to RMP 2 and RMP 12.	Refer to RMP 12.
RMP 32	Section 4.3 Seedling planting will be undertaken in early winter, within one month of the first rains.	Early winter, within one month of the first rains.	Conformant.	R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019. R_007_WorkPower_Invoice for plant supply revegetation area_31072018 Bureau of Meteorology records for Mandurah: http://www.bom.gov.au/jsp/ncc/cdio/weatherData/av?p_nccObsCode=136&p_display_type=dailyDataFile&p_startYear=2018&p_c=-19915913&p_stn_num=009977	Infill planting within the revegetation area was undertaken 9-10 July 2018. Bureau of Meteorology records for Mandurah indicates that 22.6mm of rain was received in the area during the period 10-23 April. Higher than average rainfall was received in the winter months with a total of 403.8 mm received between June 2018 – August 2018.
RMP 33	Section 4.3 If the target stocking rate is not met (determined by revegetation monitoring) contingency actions as described in Section 6 will be implemented.	Refer to item 51 – 57.	Conformant.	R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019Refer to items 47, 48 and 51 – 57.	Revegetation monitoring was undertaken on 18 September 2018, which identified that the number of breeding and foraging species per hectare is above the target density. Refer to items 47, 48 and 51 – 57.
RMP 34	Section 4.3 Seedlings (in the form of Tubestock) used for planting should be suitably mature, between 6 to 12 months to enable optimal establishment and growth.	During revegetation	Conformant.	Refer RMP 9. Site inspection on 7 February 2019. R_007_WorkPower_Invoice for plant supply revegetation area_31072018 R_012_Workpower_2015_16 Seed Collection and Seedling Summary Report. Refer RMP 9.	Refer RMP 9. Seedlings used in the revegetation areas were sourced from contractor Workpower's accredited nursery. Seeds were originally sourced by Workpower from the revegetation area in 2017 and stored in their storage facility prior to July 2018 planting event.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 35	<p>Section 4.3</p> <p>Tubestock should also not be root bound and planting should be undertaken as follows:</p> <ul style="list-style-type: none"> optimal location of each species at the site should be chosen at the time of planting to ensure appropriate condition for each species (e.g. topography, shade/sun, soil moisture etc) seedling should be planted so that the stem is vertical and the base of the plant is slightly below the original soil surface soil surrounding the seedling root ball should be pressed in firmly to avoid air pockets a minimum of three stakes and a protective guard manufactured for such purpose should be placed around the seedling to protect the vegetation from grazing and wind damage. 	During revegetation	Conformant.	Refer to RMP 34.	Refer to RMP 34.
RMP 36	<p>Section 4.3</p> <p>If during monitoring plant stress is observed a wetting agent or additional watering options will be investigated as described in Table 10.</p>	Refer to item 55.	Conformant.	<p>Site inspection on 7 February 2019.</p> <p>R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019</p> <p>C_001_Strategen_Email RE Monitoring Rehab and Landscaping area_ 21032019</p>	<p>During the vegetation inspection on 18 September 2018 plant stress was observed. These plants were identified as being older plantings. It was stated in the survey report (R_006) that the poor status of the older plants was mitigated by the health of the recent plantings in the area.</p> <p>The contractor, Workpower, investigated hydrophobic soil conditions and provided recommendations to Peet, however no actions were implemented.</p>
RMP 37	<p>Section 4.3</p> <p>If monitoring determines that revegetation requires supplementary seedling planting in subsequent years, this will be undertaken prior to the main winter rainfall, within one month of the first rains and following the required soil preparation and weed treatment as described in Table 10.</p>	Refer to item 52.	Conformant.	<p>Site inspection 7 February 2019.</p> <p>R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.</p> <p>R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019</p>	<p>Infill planting was undertaken in the revegetation area during the reporting period.</p> <p>Revegetation monitoring was undertaken on 18 September 2018. Recommendations for additional planting was not made.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 38	Section 4.4 Tree guards are to be installed around planted seedlings which will provide protection from browsing animals.	Refer to item 35.	Conformant.	Site inspection 7 February 2019. Refer to RMP 4.	Tree guards were observed throughout the revegetation and landscape areas at the time of the site inspection on 7 February 2019. Refer to RMP 4.
RMP 39	Section 4.5 Hygiene measures To reduce the risk of introducing dieback into the offset site, seed sources to be used in tubestock will be propagated by a NIASA (Nursery Industry Accreditation Scheme of Australia) accredited nursery.	Prior to revegetation activities taking place.	Conformant.	Refer RMP 9.	Workpower completed infill planting 9-10 July 2018. Workpower maintain a NIASA accredited wholesale nursery, with seedlings used for infill in the revegetation areas. Refer to RMP 9.
RMP 40	Section 4.5 Hygiene measures Vehicles, machinery, equipment and footwear will also be free of mud and soil when entering the offset site.	During revegetation	Potentially Non-Conformant.	R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019. R_005_Horizonwest_Black Swan Lake weed spray schedule landscaping area_14032019	Refer to RMP 14. 15 and 23 The revegetation area contractor, Workpower, ensured plants were free from dieback and weeds (R_004). Horizon West were not able to provide evidence that personnel implemented dieback or clean on entry procedures. Therefore, the auditors have assessed this item to be potentially non-conformant. It is recommended that Horizon West implement a site hygiene inspection procedure, including the use of a sign on sheet.
RMP 41	Section 4.7 Conservation mechanism A conservation covenant under one of the following legislative mechanisms will be applied over the offset site by 30 June 2019: <ul style="list-style-type: none"> • Transfer of Land Act 1893 • Soil and Land Conservation Act 1945 • National Trust of Australia (WA) Act 1964. 	By 30 June 2019.	Not applicable.	R_002_Strategen_Lakelands East Black Swan Swamp Revegetation Management Plan_Rev6_22092017	The requirement to meet RMP 41 has been extended from 31 January 2017 to 30 June 2019, therefore not applicable during this audit period.
RMP 42	Section 5.1.1 Revegetation areas Monitoring plots will be established within revegetation areas to enable monitoring data to be collected. Six 10 m by 10 m monitoring plots will be set up within revegetation areas taking into consideration species type, topography etc.	Every three years.	Conformant.	R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019	Revegetation monitoring was undertaken on 18 September 2018 in accordance with RMP 42. Monitoring is performed annually, which is more frequently than stated in the RMP.

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 43	<p>Section 5.1.1 Revegetation areas</p> <p>Each plot will be divided into five 1 m x 1 m quadrats based on a method provided by Dr Eleanor Bennett (Bennett E [Bennett Environmental Consulting Pty Ltd] 2012, pers. comm. 10 September).</p>	Every three years.	Conformant.	Refer to RMP 42.	Refer to RMP 42.
RMP 44	<p>Section 5.1.1 Revegetation areas</p> <p>Data will be collected from each of the five 1 m x 1 m quadrats, in order to enable collection of representative data from each quadrat. Data collected from each quadrat will include:</p> <ul style="list-style-type: none"> • flora species composition • vegetation structure • density of flora species. <p>Numbers of trees will be recorded from the entire 10 m by 10 m monitoring plot to obtain an appropriate representative sample.</p>	Every three years.	Conformant.	Refer to RMP 42.	Refer to RMP 42.
RMP 45	<p>Section 5.1.1 Revegetation areas</p> <p>Each plot will be monitored every three years during spring (commencing in spring 2019) as per Table 8 until handover (anticipated to be handed over to CoM in 2026).</p>	Every three years.	Conformant.	Refer to RMP 42.	Refer to RMP 42.
RMP 46	<p>Section 5.1.2 Landscaping areas</p> <p>Landscaping areas within the offset site will be monitored at the same time as revegetation areas. Monitoring within landscaping areas will comprise of a visual observation of plant health. Any occurrences of the following will be recorded:</p> <ul style="list-style-type: none"> • plant stress • plant mortality • weed species. 	Every three years.	Conformant.	<p>Site inspection 7 February 2019. R_013_Strategen_Lakelands East Landscape monitoring memo_Rev A_21032019 R_005_Horizonwest_Black Swan Lake weed spray schedule landscaping area_14032019</p>	<p>Monitoring of the landscaping areas was undertaken on 18 September 2018, at the same time that the revegetation monitoring was undertaken. The following recommendations were provided:</p> <ul style="list-style-type: none"> • Weed control is recommended in order to maintain the health of landscaped vegetation. . • Spot spraying is recommended for weeds occurring amongst the landscaped vegetation. <p>Spot spraying of weeds in the landscaping area was conducted throughout the reporting period by contractor Horizon West (R_005).</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 47	<p>Table 9: Monitoring program for revegetation and landscaping areas within the offset site</p> <p>Opportunistic observation during monitoring:</p> <p>a. Plant health (i.e. evidence of water stress, pests, animal grazing).</p>	3 yearly.	Conformant.	<p>R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019</p> <p>R_013_Strategen_Lakelands East Landscape monitoring memo_Rev A_21032019</p>	<p>The annual monitoring event for the revegetation and landscaping areas was undertaken 18 September 2018.</p> <p>Results from these surveys indicated that plant health was observed:</p> <ul style="list-style-type: none"> Native vegetation within the landscaping area appeared to be establishing well. There were no observations of plant mortality or plant stress. Within the revegetation area less than 20% showed evidence of grazing and pests or water stress. In the southern section of the site, the majority of older plantings were either dead or highly stressed; however, this was mitigated by the health of recent plantings in that area.
RMP 48	<p>Table 9: Monitoring program for revegetation and landscaping areas within the offset site</p> <p>Monitoring of quadrats.</p> <p>a. Plant density</p> <p>b. Species richness</p> <p>c. Plant health (i.e. evidence of water stress, pests, animal grazing).</p>	3 yearly.	Conformant.	Refer to RMP 42 and RMP 46.	Refer to RMP 42, RMP 46 and RMP 47.
RMP 49	<p>Table 9: Monitoring program for revegetation and landscaping areas within the offset site</p> <p>Observation during monitoring.</p> <p>a. Weed species.</p>	Annually until handover to the CoM.	Conformant.	<p>Refer RMP 3 and RMP 46</p> <p>R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.</p> <p>R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_1303201</p> <p>R_013_Strategen_Lakelands East Landscape monitoring memo_Rev A_21032019</p>	<p>Refer RMP 3 and RMP 46</p> <p>The Annual Revegetation Monitoring Survey undertaken in September 2018 (R_006) identified that monitoring quadrants 1,4 and 6 did not meet the completion criteria of no greater than 10% weed cover.</p> <ul style="list-style-type: none"> Quadrants 1 and 6 recorded 10-15% weed cover. Quadrant 4 recorded weed cover of 70% <p>A declared weed - *<i>Gomphocarpus fruticosus</i> (Narrowleaf Cottonbush) was identified in Quadrant 4.</p> <p>Records (R_004,R_006 and R_013) indicate weed control was undertaken throughout this audit period.</p>
RMP 50	<p>Section 6: Contingency measures</p> <p>Contingency actions will be initiated if monitoring indicates that management actions detailed for revegetation areas (Table 3) and landscaping areas within the offset site (Figure 3) have not been successful or effective and/or completion criteria are not being achieved (Table 10).</p>	Every three years.	Conformant.	<p>Site inspection 7 February 2019.</p> <p>R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019</p> <p>R_013_Strategen_Lakelands East Landscape monitoring memo_Rev A_21032019</p>	<p>During the 2017-2018 reporting period management advised that contingency actions were due to be initiated in 2019 but due to unsuccessful results in revegetation areas, this action has been brought forward.</p> <p>Annual monitoring was undertaken on 18 September 2018.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 51	<p>Section 6: Contingency measures</p> <p>Where contingency actions are required to be implemented, they will be reported to DotE as part of the EPBC Act annual environmental reporting requirements, as detailed in Section 8.</p>	As required.	Conformant.	<p>Refer to RMP 8, RMP 42 and RMP 46.</p> <p>C_001_Strategen_Email RE Monitoring Rehab and Landscaping area_ 21032019</p> <p>C_002_Strategen_Notice of EPBC Act Approval 2013_7048 2018 ACR_02052018</p>	<p>Refer to RMP 8, RMP 16, RMP 42 and RMP 46.</p> <p>Annual monitoring was undertaken on 18 September 2018.</p> <p>The previous monitoring event was undertaken on 9 October 2017. This report was posted online with a link to the document provided to the DEE 2 May 2018.</p>
RMP 52	<p>If any of the 3 yearly assessment reports determine that survival rates of planted potential breeding species or planted foraging species are below 80 percent.</p> <p>i. Identify cause.</p> <p>ii. Implement approach to remedy cause which could include:</p> <ul style="list-style-type: none"> • collecting additional provenance seed for plant propagation to compensate for the insufficient native plant species richness and/or cover • undertaking infill seedling planting within 12 months of the date of survey • application of additives such as Seasol, water granules, soil breaker, water retainer, wetting agent or fertiliser tablets as deemed necessary by revegetation contractor. • further weed and/or pest control if required post infill planting. <p>iii. Monitor success of contingency measure(s).</p>	As required.	Conformant.	<p>Refer to RMP8, RMP 42 and RMP 46.</p> <p>R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019</p> <p>R_013_Strategen_Lakelands East Landscape monitoring memo_Rev A_21032019</p>	<p>Refer RMP 8, RMP 42 and RMP 46</p> <p>Infill planting was conducted in the revegetation area 9-10 July 2018.</p> <p>Annual monitoring of the revegetation and landscaping areas was undertaken on 18 September 2018. Results from this event indicated that the number of breeding and foraging species per hectare is above the target density and currently meeting the criterion for 80% survival. It was recommended that ongoing weed control be implemented across the revegetation area with a focus on areas around the survey quadrants which are not meeting completion criteria for weed cover.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 53	<p>Approximately 20% of seedlings planted show evidence of damage by animal (i.e. grazing).</p> <p>i. Implement measures to prevent further damage which could include:</p> <ul style="list-style-type: none"> • animal control program • installation of temporary fencing • application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required • applying wetting agent or supplementary watering • removing damaged plants and replanting • providing alternate species suitable to the site and provenance requirements. <p>2. Monitor success of contingency measure(s).</p>	As required.	Conformant.	<p>Site Inspection 7 February 2019 R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019</p> <p>R_013_Strategen_Lakelands East Landscape monitoring memo_Rev A_21032019</p>	<p>Annual monitoring of the revegetation and landscaping areas was undertaken on 18 September 2018.</p> <p>Within the revegetation areas less than 20% of seedlings planted show evidence of grazing (R_006).</p> <p>Seedlings within the landscaping area appeared to be establishing well and in a healthy condition (R_013). There were no observations of plant stress or mortality within the landscaping area.</p>
RMP 54	<p>Approximately 20% of seedlings planted show evidence of damage by pests.</p> <p>i. Implement measures to prevent further damage which could include:</p> <ul style="list-style-type: none"> • animal control program • installation of temporary fencing • application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required • applying wetting agent or supplementary watering • removing damaged plants and replanting • providing alternate species suitable to the site and provenance requirements. <p>ii. Monitor success of contingency measure(s).</p>	As required.	Conformant.	Refer RMP 53	Refer RMP 53

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 55	<p>Approximately 20% of seedlings planted show evidence of water stress.</p> <p>i. Implement measures to prevent further damage which could include:</p> <ul style="list-style-type: none"> • animal control program • installation of temporary fencing • application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required • applying wetting agent or supplementary watering • removing damaged plants and replanting • providing alternate species suitable to the site and provenance requirements. <p>ii. Monitor success of contingency measure(s).</p>	As required.	Conformant.	Refer RMP 53	Refer RMP 53
RMP 56	<ul style="list-style-type: none"> • No greater than 10% weed cover • No Declared Plants or weeds of national environmental significance <p>1. Investigate cause (e.g. adjacent sources of weed seed).</p> <p>2. Implement measures to remove weeds (e.g. weed control) as practicable.</p> <p>3. Monitor success of contingency measure(s).</p>	As required.	Potentially Non-Conformant.	<p>Site inspection on 7 February 2019.</p> <p>R_002_Strategen_Lakelands East Black Swan Swamp Revegetation Management Plan_Rev6_22092017</p> <p>R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.</p> <p>R_005_Horizonwest_Black Swan Lake weed spray schedule landscaping area_14032019</p> <p>R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019</p>	<p>Refer RMP 3, RMP 46 and RMP 49.</p> <p>The Annual Revegetation Monitoring Survey undertaken in September 2018 (R_006) identified that monitoring quadrants 1,4 and 6 in the revegetation area showed greater than 10% weed cover.</p> <ul style="list-style-type: none"> • Quadrants 1 and 6 recorded 10-15% weed cover. • Quadrant 4 recorded weed cover of 70% <p>A declared weed - *<i>Gomphocarpus fruticosus</i> (Narrowleaf Cottonbush) was identified in Quadrant 4. This species is listed as a declared pest species in Western Australia.</p> <p>Records (R_004 and R_006) indicate weed control was undertaken throughout this audit period. However, the presence of weeds identified during the Annual Revegetation Monitoring Survey and site inspection demonstrate that this weed control has not been effective in managing weeds on site.</p> <p>It is recommended that weed spraying is conducted more frequently throughout the audit period and success of weed control is monitored following spraying events.</p>

Reference	Condition	Timing	Conformance status	Evidence	Comments
RMP 57	<p>Unauthorised access (people and vehicles).</p> <p>i. Implement measures to prevent further unauthorised access (e.g. installation of temporary fencing and signage), as practicable.</p> <p>ii. Monitor success of contingency measure(s).</p>	As required.	Conformant.	Management advice on 26 March 2019.	Management advised that there is unauthorised access (public, motorbikes etc.) and that it is impractical to implement prevention measures. Management further advised that unauthorised access is not causing any problems.
RMP 58	<p>Section 7 Plan implementation</p> <p>This RMP will be implemented by Peet until responsibility of the revegetation site is transferred to the City of Mandurah (CoM).</p>	Until responsibility of the revegetation site is transferred to the City of Mandurah.	Conformant.	Management advice on 26 March 2019.	Peet continued to be responsible for implementing the RMP throughout the audit period.
RMP 59	<p>Section 7 Plan implementation</p> <p>The revegetation site will be vested as Crown Reserve designated as Public Open Space (POS), with management vested to the City of Mandurah under Section 152 of the <i>Planning and Development Act 2005</i>.</p>	At handover.	Not applicable.	Refer RMP 41.	Refer RMP 41.
RMP 60	<p>Section 7.1 Roles and responsibilities</p> <p>All contractors and staff will be required to operate in accordance with this RMP.</p>	At all times.	Potentially Non-Conformant.	<p>Refer RMP 23 & RMP 40</p> <p>Management advice on 26 March 2019.</p> <p>C_004_Strategen_ Additional evidence required for the audit_12042018</p>	<p>Refer RMP 23 & RMP 40</p> <p>Management advised that all contractors and staff are required to operate in accordance with this RMP.</p> <p>During the audit it was identified that Contractor Horizon West are not implementing dieback and hygiene procedures onsite.</p>

Appendix 2
Evidence register

Code	Reference	Author/ Organisation	Version	Topic /notes
R_001	R_001_Strategen_Lakelands East Annual Compliance Report_02052018.	Strategen	Rev 0	2017-2018 ACR
R_002	R_002_Strategen_Lakelands East Black Swan Swamp Revegetation Management Plan_Rev6_22092017	Strategen	Rev 6	Lakelands East Black Swan Swamp Revegetation Management Plan
W_001	W_001_Peet_Website 2018 ACR_11022019.	Peet		2017-2018 ACR on website
W_002	W_002_Peet_Website Lakelands East documents_14022019	Peet		Lakelands East documents available on website
R_003	R_003_Strategen_Email to DEE 2018 ACR website upload screen shot_02052018	Strategen		Email submission of 2017-2018 ACR to DEE
W_003	W_003_Peet_Website 2016 ACR - incorrect title_14022019	Peet		2015-2016 ACR on website (under incorrect title)
R_004	R_004_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_14032019.	Workpower		Workpower revegetation area pre-start hygiene inspection check
R_005	R_005_Horizon West_Black Swan Lake weed spray schedule landscaping area_14032019	Horizon West		Horizon West landscaping area weed spray schedule
R_006	R_006_Strategen_Lakelands East Black Swan Swamp Annual Revegetation Monitoring Spring 2018_RevA_13032019	Strategen		Annual Lakelands East Black Swan Swamp Revegetation Monitoring Report
R_007	R_007_Workpower_Invoice for plant supply revegetation area_31072018	Workpower		Invoice payable by PEET for services conducted by Workpower
R_008	R_008_Workpower_NIASA Workpower Wholesale Nursery_2018	Workpower		NIASA certification 2018
R_009	R_009_Workpower_NIASA Workpower Wholesale Nursery_2017	Workpower		NIASA certification 2017
R_010	R_009_Workpower_NIASA Workpower Wholesale Nursery_2016	Workpower		NIASA certification 2016
F_001	F_001_Workpower_Invoice for tree guard maintenance_ES10840_21032018	Workpower		Invoice payable by PEET for services conducted by Workpower
R_011	R_011_Workpower_Invoice for weed control February 2018_09022018	Workpower		Invoice payable by PEET for services conducted by Workpower
R_012	R_012_Workpower_2015_16 Seed Collection and Seedling Summary Report	Workpower		Report with listed seeds and seedling propagated throughout the offset area
D_001	D_001_Strategen_Potential breeding and foraging trees_19032019	Strategen		Results from 2018 tree survey within development area
R_013	R_013_Strategen_Lakelands East Landscape monitoring memo_Rev A_21032019	Strategen	Rev A	Report detailing results from 2018 survey conducted within the landscaping area

Code	Reference	Author/ Organisation	Version	Topic /notes
C_001	C_001_Strategen_Email RE Monitoring Rehab and Landscaping area_ 21032019	Strategen		Email from Strategen Planning team
P_001	P_001_Strategen_Evidence of grazing_070220019	Strategen		Photo
P_002	P_002_Strategen_Evidence of guards in revegetation area_07032019	Strategen		Photo
P_003	P_003_Strategen_Evidence of weeds along the pedestrian path_070319	Strategen		Photo
P_004	P_004_Strategen_Evidence of weed control_070319	Strategen		Photo
P_005	P_005_Strategen_Evidence of corflute tree guards reveg_07022019	Strategen		Photo
P_006	P_006_Strategen_Evidence of corflute tree guards reveg_07022019	Strategen		Photo
P_007	P_007_Strategen_Evidence of weed control landscaping area_07022019	Strategen		Photo
P_008	P_008_Strategen_Evidence of corflute tree guards landscape_07022019	Strategen		Photo
P_009	P_009_Strategen_Evidence of corflute tree guards landscape_07022019	Strategen		Photo
C_002	C_002_Strategen_Notice of EPBC Act Approval 2013_7048 2018 ACR_02052018	Strategen		Email from Strategen to DEE submitting 2018 ACR.
C_003	C_003_Strategen_Potential additional trees for retention_27092018	Strategen		Email from Strategen RE: 2018 Tree survey
D_002	D_002_Strategen_Updated Tree Dataset 26092018	Strategen		Spreadsheet with tree data
C_004	C_004_Strategen_Additional evidence required for the audit_12042018	Strategen		Email from Peet regarding information for 2018 ACR