

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

3 May 2021

60368-137369 (Rev 0)

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

Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed



Full name (please print)

Clayton Thomas

Position (please print)

Senior Development Manager

Organisation (please print including ABN/ACN if applicable)

Peet Mandurah Syndicate Limited

Date

3 / 05 / 21

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- Appendix A EPBC Approval 2013/7048 and Variation to Approval Conditions
- Appendix B Audit of Implementation of the Revegetation Management Plan

1. Introduction

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

1.1 Project background

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

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

The project commenced on 2 February 2015.

1.2 Environmental approval to implement the project

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

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

2. Current status

Activities undertaken during the audit period (3 February 2020 to 2 February 2021) included:

- Clearing and construction of Stages 72A, 72B, 69A and 78.
- Four rounds of weed control undertaken within the revegetation and landscaping areas during Winter and Spring 2020/21
- Annual monitoring of revegetation areas undertaken in October 2020.
- Infill planting was undertaken in the revegetation areas in August 2020. No Infill planting was undertaken in the landscaping areas during the audit period.

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 2020 and 3 February 2021 for the conditions of EPBC 2013/7048 and implementation of the RMP (Revision 7, Strategen 2020) required by conditions 3 and 4 of EPBC 2013/7048.

3.1.2 Methodology

The audit was undertaken during March and April 2021 by Certified Environmental Auditors from Strategen-JBS&G, Andrew Winzer and Joshua Hall. A site inspection was carried out on 20 April 2021. An interview was held with Kasia Majewski, PEET Development Manager, on 20 April 2021. Table 3.1 provides an overview of the personnel consulted as part of the audit. A review of documentation was also undertaken to support the audit.

Table 3.1: Persons consulted during audit

Person and position	Organisation	Purpose
Kasia Majewski – Development Manager	Peet	To provide an overview of activities undertaken on site during the audit period to assess implementation and performance of EPBC 2013/7048 conditions.
William Oversby – Consultant	Strategen-JBS&G	Provide auditors with follow up evidence as required on behalf of PEET.

3.2 Audit terminology

The ‘Status’ field of the audit tables (refer to Section 4) describes the implementation of actions and compliance with the approval and associated management plans. The DAWE has issued ACR Guidelines. Terminology from this guidance was applied in this audit (Table 3.2).

Table 3.2: Action implementation status

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

Source: adapted from DotE (2014)

4. Audit results

The results of the audit of EPBC 2013/7048 are shown in Table 4.1. The results of the audit of conformance with the management actions contained within the RMP are outlined in Appendix B.

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

4.1 Compliance with conditions

Of 28 sub-conditions of EPBC 2013/7048:

- 24 were found to be 'Compliant', with three of those 'Compliant (completed)',
- three were found to be 'Not applicable',
- one was found to be potentially non-compliant.

The one condition found to be non-compliant was:

- EPBC 13.2 regarding the approval holder not publishing the revised RMP on its website within 1 month of being submitted to the CEO.

4.2 Conformance with the Revegetation Management Plan

Of the 60 key actions identified from the RMP:

- 46 were found to be 'Conformant', of which one was identified as 'Conformant (completed)',
- 6 were found to be 'Not applicable',
- 8 were found to be 'Potentially non-Conformant'.

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

- RMP 3 regarding >10% weed cover in quadrats 1, 2 and 7.
- RMP 12, 13, 30, 32, 35, 37 and 60 relating to seedling planting. The types of tree guards, the year seedlings were collected and timing of planting were not as per Revegetation Management plan methodologies.

The auditors determined these potential non-conformances are minor and have either minimal or no environmental impact. Weed control was undertaken twice after the monitoring survey was completed, the 20/04/2021 site inspection noted the weeds in quadrants 2 and 7 had been successfully treated.

Infill planting was required during the 2020 audit period and occurred in August 2020. The corflute tree guards that were used did not have 3 wooden stakes as required by the RMP. Corflute is now used by many revegetation contractors due to its tough and rigid nature and requires just one wooden stake. The site audit found all tree guards intact 8 months post planting.

Seed collection was required to be conducted in late spring to summer of the year before planting. Seed collection was completed between 2011-2019 by the NASIA accredited nursery that provided the seed. Standard nursery practice is to undertake seeding between October to December of the previous year. Seeding of the seed collected between 2011-2019 occurred between spring and summer in 2019 and were planted in August 2020. Planting was required to be completed within 1 month of the first winter rain, this did not occur for the 2020 infill planting that was completed in August.

Although the above were non-conformant with actions from the RMP, the objective of this plan; to successfully revegetate the Black Swan Lake area has been achieved. Images taken during the most recent site inspection confirm the 2020 infill planting site is flourishing.

Table 4.1: Compliance with conditions of EPBC 2013/7048

Condition Number	Condition	Evidence	Comments	Compliance status
EPBC 1.1	The approval holder must not clear any black cockatoo habitat trees outside of the project area.	Management advice on 29/04/2021 C14_Peet Lakelands Evidence of No clearing outside of project area	Clearing contractors Tabec confirmed that no black cockatoo habitat trees were cleared outside of the project area (Attachment A of EPBC 2013/7048)	C
EPBC 2.1	The approval holder must retain no less than three hundred and three (303) black cockatoo habitat trees, including no less than one hundred and twenty (120) potential breeding trees and no less than one hundred and eighty-three (183) foraging species within the project area.	C10_2021 lakelands tree survey results	The Lakelands significant tree survey data as at 23 April 2021 showed that 431 trees have been identified for retention, with 431 identified as foraging species and 159 of those identified as potential breeding trees. Therefore, the number of trees retained meets the required criteria.	C
EPBC 3.1	To compensate for the loss of black cockatoo habitat trees, within one month of the date of the approval, the approval holder must prepare and submit a Revegetation Management Plan (RMP) for the Ministers approval to revegetate within the offset site.	R16_Lakelands Revegetation Management Plan (Rev 8) R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019	This condition has previously been assessed as compliant. The current revised version (Rev 8) of the RMP was submitted to DAWE on 27 May 2020 approved on 24 June 2020.	C (complete)
EPBC 3.2	The approval holder must not commence the action unless the Minister has approved the RMP.	R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019	This obligation has been previously assessed as Compliant (R_010).	C (complete)
EPBC 3.3	The RMP must include, but may not be limited to: <ul style="list-style-type: none"> a. Objectives of the RMP; b. Location, condition, size and suitability of the revegetation areas within the offset site; c. Detailed information on each stage of the revegetation project; d. Black cockatoo tree and shrub species to be utilised, source of plant stock, stocking rates (at least six thousand two hundred (6200) tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species), planting method and schedule; e. Preventative management actions that will be implemented to manage weeds, feral animals and anthropogenic activities, within the offset site prior to, during and post planting; f. Revegetation success criteria (that 3 years from the date of planting the approval holder must achieve a minimum of 80 percent survival rate of the planted potential breeding species and 80 percent survival 	R16_Lakelands Revegetation Management Plan (Rev 8)	The approved RMP Rev 8 includes the required details.	C

Condition Number	Condition	Evidence	Comments	Compliance status
	<p>rate of the planted foraging species), and detailed response measures and corrective actions should success criteria not be met;</p> <p>g. Monitoring program, including the type, timing and frequency of monitoring;</p> <p>h. Responsibilities for planning, implementing, management, reporting and monitoring the RMP;</p> <p>i. Timeframes for the implementation of each stage of the RMP;</p> <p>j. Details on the conservation mechanism to protect and conserve the offset site.</p>			
EPBC 4.1	If the Minister approves the RMP, then the approval holder must implement the approved RMP.	Refer to Appendix B	<p>The RMP has been implemented across the Project during the period. Refer to Appendix B for further information.</p> <p>Of 60 key actions identified from the RMP:</p> <ul style="list-style-type: none"> • 8 were found to be 'Potentially non-Conformant.' • 46 were found to be 'Conformant', of which 1 were identified as 'Conformant (completed)'. • 6 were found to be 'Not applicable' 	C
EPBC 5.1	<p>To avoid and mitigate impacts to black cockatoos, if clearing is to be undertaken during the breeding season (July - November), within 7 days prior to clearing, the approval holder must ensure all potential nesting trees within the project area are investigated to detect the presence of black cockatoos using hollows. The investigation must be undertaken by a suitably qualified and experienced person. If any black cockatoos are detected using a hollow in a tree or trees, the approval holder must:</p> <ol style="list-style-type: none"> Clearly identify all such trees with fencing and signage that must be located within two (2) metres of the base of each such tree; not clear any such tree of any vegetation within 10 metres of any such tree; and 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 	<p>R08_201208 Programme - Lakelands Stage 72AB program - SM14 69A C13_Peet Evidence of Fauna Removal and Clearing R10_lakelands 69A Fauna Removal Invoice R12_Lakelands Stage 72A Fauna - Lakelands stage 72A June 2020 invoice R13_Lakelands Stage 72B Fauna - lakelands stage 72B June 2020 invoice</p>	<p>Clearing was undertaken between the 27/08/2020 – 31/08/2020. The clearing was conducted at stage 69A. Fauna relocation was completed at stage 69A between the 17/08/2020 – 26/08/2020 as seen in R08 Clearing programme and R10 Fauna Removal and Clearing invoice.</p> <p>No other clearing was completed between July and November 2020.</p> <p>Clearing for stage 72A and 72B occurred between the 15/06/2020 – 16/06/2020 and 23/06/2020 – 25/06/2020 respectively. Although these clearing dates were not during the Black Cockatoo breeding season, fauna specialists were still engaged to conduct fauna removal for both stages 1 week prior to the clearing.</p>	C

Condition Number	Condition	Evidence	Comments	Compliance status
	hollow/s in each such tree are no longer used by black cockatoos.			
EPBC 6.1	Within 30 days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.	R_003_Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019	This obligation has been previously assessed as Compliant.	C (complete)
EPBC 7.1	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the RMP, required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the Environment Protection and Biodiversity Conservation Act 1999, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	This audit report substantiates that this condition has been complied with	Peet provided the auditors with records substantiating all activities associated with or relevant to the conditions of approval for all applicable conditions and requirements in the RMP. There was no request received from the Department during the audit period	C
EPBC 8.1	Within three months of every 12-month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of the RMP, over the previous 12 months, as specified in the conditions.	P01_Peet_Website 2020 ACR_23032021 Notice of EPBC Act Approval 203748 2020 Annual Compliance report	The ACR was prepared and published on Peet's website on 02 April 2020, which is within three months of the 12-month anniversary of commencement (3 February).	C
EPBC 8.2	Documentary evidence providing proof of the date of publication must be provided to the Department at the same time as the compliance report is published.	C01 - Notice of EPBC Act Approval 20137048 2020 Annual Compliance Report R03_ Lakelands East ACR (Rev 0) 2020	Documentary evidence detailing the date of publication of the 2020 ACR on Peet's website was provided to DAWE on 2 April 2020.	C
EPBC 8.3	The compliance reports must remain on the website for the life of the approval.	P01_Peet_Website 2021 ACR_23032021 P02_Peet_Website 2021 ACR_23032021	The ACR for the audit periods 2016-2017, 2017-2018, 2018-2019 and 2019 – 2020 were available online during the reporting period. The ACR for the audit period 2015 – 2016 was available on the Peet website, however was available under the 'Lakelands East Revegetation Management Plan' title when accessed on 23 March 2021. Recommendation:	C

Condition Number	Condition	Evidence	Comments	Compliance status
			The correct link for Lakelands ACR 2016 should be updated on the PEET website.	
EPBC 8.4	All contraventions must also be included in the compliance reports.	P01_Peet_Website 2021 ACR_23032021 P02_Peet_Website 2021 ACR_23032021 C01 - Notice of EPBC Act Approval 20137048 2020 Annual Compliance Report R03_Lakelands East ACR (Rev 0) 2020	<p>Contraventions have been included within the compliance reports published on the Peet website.</p> <p>In the 2016 to 2017 ACR, no potential non-compliances with conditions of EPBC 2013/7048 were identified; and two potential non-conformances with the RMP requirements were reported.</p> <p>In the 2017 to 2018 ACR, one potential non-compliance with conditions of EPBC 2013/7048 was identified; and eight potential non-conformances with the RMP requirements were reported.</p> <p>In the 2018 to 2019 ACR, no potential non-compliances with conditions of EPBC 2013/7048 were identified; and six potential non-conformances with the RMP requirements were reported.</p> <p>In the 2019 to 2020 ACR, no potential non-compliances with conditions of EPBC 2013/7048 were identified; 5 minor non compliances with the RMP requirements were reported</p>	C
EPBC 8.5	Unless otherwise agreed to in writing by the Minister, the approval holder must provide a copy of each compliance report to members of the public upon request. Copies must be provided free of charge as soon as reasonably practicable but within no longer than 7 days of the request.	Management advice on 29/04/2021	Management advised that there were no requests from the public for copies of the compliance reports during the audit period.	C
EPBC 9.1	Potential or actual contraventions of the conditions of the approval must be reported to the Department in writing within 2 business days of the approval holder becoming aware of the actual or potential contravention.	Management advice on 29/04/2021	Management advised that there were no potential or actual contraventions of the EPBC approval conditions during the audit period.	C
EPBC 10.1	Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the	Management advice on 29/04/2021	Management advised that they had not received any such direction from the Minister to conduct an independent audit during the audit period.	NA

Condition Number	Condition	Evidence	Comments	Compliance status
	conditions of approval is conducted and a report submitted to the Minister.			
EPBC 10.2	The independent auditor must be approved by the Minister prior to the commencement of the audit.	Refer to EPBC 10.1	Refer to EPBC 10.1	NA
EPBC 10.3	Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	Refer to EPBC 10.1	Refer to EPBC 10.1	NA
EPBC 11.1	The approval holder may choose to revise the RMP approved by the Minister under condition 3 without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised RMP would not be likely to have a new or increased impact.	C01 - Notice of EPBC Act Approval 20137048 2020 Annual Compliance Report C04_Lakelands East EPBC approval 2013_7048 _SEC_OFFICIAL_C09_DAWE Conformation of Seedling being sourced from outside the 50km limit	<p>The Revegetation Management Plan was revised on the 19/02/2020. There is no increased impacts to Matters of national Environmental Significance. The report was revised to change the date of the conservation covenant from 30 June 2019 – 30 June 2020.</p> <p>The conservation covenant will ensure that the offset site and its value to black cockatoos is retained in perpetuity.</p> <p>DAWE were notified of revision 7 to the RMP on the 02/04/2020.</p> <p>The RMP was revised again on the 16/07/2020 after email communication between DAWE & Peet on 24/06/2020. The revision included a contingency measure when tube stock grown from seed collected within 50 km of the revegetation site is not available for infill planting. A contingency action was added to source tubestock grown from seed collected from the Swan Coastal Plain.</p> <p>DAWE approved the contingency measure on the 24/06/2020 for the 2020 programme only.</p> <p>No other revisions to the Revegetation Management Plan occurred during the audit period</p>	C
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	Refer to EPBC 11.1	Refer to EPBC 11.1	C

Condition Number	Condition	Evidence	Comments	Compliance status
	<p>Department with an electronic copy of the revised RMP;</p> <p>ii. implement the revised RMP from the date that the plan is submitted to the Department; and</p> <p>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.</p>			
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.	Management Advise on 24/04/2021	The approval holder did not revoke its choice to implement the revised management plan during the audit period.	C
EPBC 11.4	11B. Condition 11 does not apply if the revisions to the approved RMP include changes to matters listed under condition 3 j, unless otherwise agreed in writing by the Minister. This does not otherwise limit the circumstances in which the taking of the action in accordance with a revised RMP would, or would not, be likely to have new or increased impacts.	Refer to EPBC 11.1	<p>Revision 7 to the RMP included changes to matters listed under 3j. The conservation covenant date was changed from the 30 June 2019 to 30 June 2020.</p> <p>The EPA were notified of this change in the 2020 ACR submission email for EPBC Act Approval 2013/7048.</p> <p>A receipt of submission was sent by the EPA and no further correspondence was received.</p> <p>Another revision was made to the RMP, this did not include a revision to matters listed under condition 3j.</p>	C
EPBC 11.5	<p>11C. If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the revised RMP would be likely to have a new or increased impact, then:</p> <p>i. Condition 11 does not apply, or ceases to apply, in relation to the revised RMP; and</p> <p>ii. The approval holder must implement the RMP approved by the Minister.</p> <p>To avoid any doubt, this condition does not affect any operation of conditions 11, 11A and 11B in the period before the day the notice is given.</p>	Refer to EPBC 11.1	No notice from the minister was received by the approval holder that the RMP was likely to have a new or increased impact.	C

Condition Number	Condition	Evidence	Comments	Compliance status
	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.			
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.	Refer to EPBC 11.1	Refer to EPBC 11.1	C
EPBC 12.1	If the Minister believes that it is necessary or convenient for the better protection of listed threatened species and communities to do so, the Minister may request that the approval holder make specified revisions to the RMP specified in the conditions and submit the revised RMP for the Minister's written approval. The approval holder must comply with any such request.	Management Advise on 24/04/2021	Management advised that no requests were received from the Minister during the audit period.	NA
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.	Strategen-JBS&G_Lakelands RMP Rev 8	Revision 8 of the RMP was implemented during this audit period.	C
EPBC 13.1	Unless otherwise agreed to in writing by the Minister, the approval holder must publish the revised RMP on its website.	P02_Peet Website RMP Rev8 2021 P13_Peet Website RMP Rev8 2021	Revision 8 of the RMP (current) was accessed online by the auditors on 29/04/2021	C
EPBC 13.2	The revised RMP must be published on that website within 1 month of being approved or submitted under condition 11 i. and remain published for the life of the approval.	P02_Peet Website RMP Rev8 2021 P13_Peet Website RMP Rev8 2021	<p>Revision 8 of the RMP (latest) was not uploaded on the website within 1 month of being approved.</p> <p>This is a potential non-compliance, however it is administrative and has no material environmental impact. A minor change to a contingency measure was made during the audit period, the revised RMP was submitted to DAWE and was implemented during the audit period. The change in the document did not constitute a new or increased impact to the environment.</p> <p>Recommendation: When submitting future revised RMPs, upload the RMP to the website at the same time.</p>	PNC

2. Limitations

Scope of services

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

Reliance on data

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

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

Environmental conclusions

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

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

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3. References

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

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

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



Australian Government
Department of the Environment

Approval

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

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

Proposed action

person to whom the approval is granted Peet Mandurah Syndicate Limited

proponent's ACN 062 315 673

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

Approval decision

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

conditions of approval

This approval is subject to the conditions specified below.

expiry date of approval

This approval has effect until 31 December 2028

Decision-maker

name and position Dr Simon Banks
Assistant Secretary
Environment Assessment Branch

signature

date of decision 03 December 2014

Conditions attached to the approval

1. The **approval holder** must not **clear** any **black cockatoo habitat trees** outside of the **project area**.
2. The **approval holder** must retain no less than three hundred and three (303) **black cockatoo habitat trees**, including no less than one hundred and twenty (120) **potential breeding trees** and no less than one hundred and eighty-three (183) **foraging species** within the **project area**.
3. To compensate for the loss of **black cockatoo habitat trees**, within one month of the date of the approval, the **approval holder** must prepare and submit a Revegetation Management Plan (RMP) for the Ministers approval to revegetate within the **offset site**. The **approval holder** must not **commence** the action unless the **Minister** has approved the RMP. The RMP must include, but may not be limited to:
 - a. Objectives of the RMP;
 - b. Location, condition, size and suitability of the revegetation areas within the **offset site**;
 - c. Detailed information on each stage of the revegetation project;
 - d. **Black cockatoo** tree and shrub species to be utilised, source of plant stock, stocking rates (at least six thousand two hundred (6200) tree or shrub plants, including no less than 3000 plants that are **potential breeding species** and no less than 3200 plants that are **foraging species**), planting method and schedule;
 - e. Preventative management actions that will be implemented to manage weeds, feral animals and anthropogenic activities, within the **offset site** prior to, during and post planting;
 - f. Revegetation success criteria (that 3 years from the date of planting the approval holder must achieve a minimum of 80 percent survival rate of the planted **potential breeding species** and 80 percent survival rate of the planted **foraging species**), and detailed response measures and corrective actions should success criteria not be met;
 - g. Monitoring program, including the type, timing and frequency of monitoring;
 - h. Responsibilities for planning, implementing, management, reporting and monitoring the RMP;
 - i. Timeframes for the implementation of each stage of the RMP;
 - j. Details on the conservation mechanism to protect and conserve the **offset site**.
4. If the **Minister** approves the RMP, then the **approval holder** must implement the approved RMP.
5. To avoid and mitigate impacts to **black cockatoos**, if **clearing** is to be undertaken during the breeding season (July – November), within 7 days prior to **clearing**, the **approval holder** must ensure all **potential nesting trees** within the **project area** are investigated to detect the presence of **black cockatoos** using hollows. The investigation must be undertaken by a **suitably qualified and experienced person**.

If any **black cockatoos** are detected using a hollow in a tree or trees, the **approval holder** must:

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

2. not clear any such tree or any vegetation within 10 metres of any such tree; and
3. undertake all reasonable measures to avoid any such tree from being cut down, felled, removed, killed, destroyed, poisoned, ring-barked, uprooted or burned

until a **suitably qualified and experienced person** has verified in writing that the hollow/s in each such tree are no longer being used by **black cockatoos**.

6. Within 30 days after the **commencement** of the action, the **approval holder** must advise the **Department** in writing of the actual date of **commencement**.
7. The **approval holder** must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the RMP, required by this approval, and make them available upon request to the **Department**. Such records may be subject to audit by the **Department** or an independent auditor in accordance with section 458 of the *Environment Protection and Biodiversity Conservation Act 1999*, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the **Department's** website. The results of audits may also be publicised through the general media.
8. Within three months of every 12 month anniversary of the **commencement** of the action, the **approval holder** must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of the RMP, over the previous 12 months, as specified in the conditions. Documentary evidence providing proof of the date of publication must be provided to the **Department** at the same time as the compliance report is published. The compliance reports must remain on the website for the life of the approval. All contraventions must also be included in the compliance reports. Unless otherwise agreed to in writing by the **Minister**, the **approval holder** must provide a copy of each compliance report to members of the public upon request. Copies must be provided free of charge as soon as reasonably practicable but within no longer than 7 days of the request.
9. Potential or actual contraventions of the conditions of the approval must be reported to the **Department** in writing within 2 business days of the **approval holder** becoming aware of the actual or potential contravention
10. Upon the direction of the **Minister**, the **approval holder** must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the **Minister**. The independent auditor must be approved by the **Minister** prior to the commencement of the audit. Audit criteria must be agreed to by the **Minister** and the audit report must address the criteria to the satisfaction of the **Minister**.
11. If the **approval holder** wishes to carry out any activity otherwise than in accordance with the RMP, as specified in the conditions, the **approval holder** must submit to the **Department** for the **Minister's** written approval, a revised version of the RMP. The varied activity must not **commence** until the **Minister** has approved the varied RMP in writing. The **Minister** will not approve a varied RMP, unless the revised RMP would result in an equivalent or improved environmental outcome over time. If the **Minister** approves the revised RMP, that RMP must be implemented in place of the RMP previously approved.
12. If the **Minister** believes that it is necessary or convenient for the better protection of listed threatened species and communities to do so, the **Minister** may request that the **approval holder** make specified revisions to the RMP specified in the conditions and submit the revised RMP for the **Minister's** written approval. The **approval holder** must comply with any such request. The revised approved RMP must be implemented. Unless the **Minister**

has approved the revised RMP, then the **approval holder** must continue to implement the RMP previously approved, as specified in the conditions.

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

Definitions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Figure 1 Proposal area

Scale: 1:10,000 A2



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



Legend

-  Proposal area
-  Proposed planting area
-  Development area





VARIATION TO CONDITIONS ATTACHED TO APPROVAL

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

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

Approved action

Person to whom the approval is granted

Peet Mandurah Syndicate Limited

ACN: 062 315 673

Approved action

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

Variation

Variation of conditions of approval

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

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

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

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

Date of effect

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

Person authorised to make decision

Name and position

Shane Gaddes
Assistant Secretary
Compliance & Enforcement Branch

Signature

Date of decision

9 May 2016

Condition attached to the approval

11. The approval holder may choose to revise the RMP approved by the **Minister** under condition 3 without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised RMP would not be likely to have a **new or increased impact**. If the approval holder makes this choice it must:
- i. notify the **Department** in writing that the approved RMP has been revised and provide the **Department** with an electronic copy of the revised RMP;
 - ii. implement the revised RMP from the date that the plan is submitted to the **Department**; and
 - iii. for the life of this approval, maintain a record of the reasons the approval holder considers that taking the action in accordance with the revised RMP would not be likely to have a **new or increased impact**.
- 11A. The approval holder may revoke its choice under condition 11 at any time by notice to the **Department**. If the approval holder revokes the choice to implement the revised RMP, without approval under section 143A of the Act, the RMP approved by the **Minister** must be implemented.
- 11B. Condition 11 does not apply if the revisions to the approved RMP include changes to matters listed under condition 3 j, unless otherwise agreed in writing by the **Minister**. This does not otherwise limit the circumstances in which the taking of the action in accordance with a revised RMP would, or would not, be likely to have **new or increased impacts**.
- 11C. If the **Minister** gives a notice to the approval holder that the **Minister** is satisfied that the taking of the action in accordance with the revised RMP would be likely to have a **new or increased impact**, then:
- i. Condition 11 does not apply, or ceases to apply, in relation to the revised RMP; and
 - ii. The approval holder must implement the RMP approved by the **Minister**.
- To avoid any doubt, this condition does not affect any operation of conditions 11, 11A and 11B in the period before the day the notice is given.
- At the time of giving the notice the **Minister** may also notify that for a specified period of time condition 11 does not apply for the RMP required under the approval.
- 11D. Conditions 11, 11A, 11B and 11C are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised RMP to the **Minister** for approval.
13. Unless otherwise agreed to in writing by the **Minister**, the approval holder must publish the revised RMP on its website. The revised RMP must be published on that website within 1 month of being approved or submitted under condition 11 i. and remain published for the life of the approval.

Definitions

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

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

Appendix B Audit of Implementation of the Revegetation Management Plan

Table B.1: Revegetation Management Plan Audit Table

Reference	Condition	Timing	Evidence	Comments	Conformance status
RMP 1	Section 3.1 Revegetation objectives and scope Revegetation will occur within two specified areas (revegetation areas and landscaping areas in the offset site) as displayed in Figure 1.	During revegetation	Site inspection 20/04/2021 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 C02_RE_Lakelands 2021 Annual Compliance Report C03_RE_Lakelands ACR audit evidence request	Revegetation planting commenced in the area specified in 2016, with infill planting undertaken within the revegetation areas during July 2018. Infill planting occurred within the revegetation areas in winter 2020. Landscaping works involving revegetation were completed in July 2017.	C
RMP 2	Section 3.1 Revegetation objectives and scope Planting of 6200 tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species will occur within "revegetation areas" totalling a maximum of 9.14 ha in size and areas intended for managed landscaping (landscaping areas) totalling 1.23 ha within the total offset site (10.8 ha).	Refer to RMP 7.	R03_Lakelands East ACR (Rev 0) 2020 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	This requirement was assessed as compliant in the 2016, 2017, 2018, 2019 and 2020 ACR, which identified that revegetation using 6200 breeding and foraging species as defined in the EPBC 2013/7048 approval occurred in 2016. The annual revegetation monitoring survey undertaken on 28/10/2020 stated that this criterion has been met and was confirmed by inspection of the planting list (table 4.1).	C
RMP 3	Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ - No greater than 10% weed cover. - No Declared Plants or weeds of national environmental significance.	At completion.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 P01_Site Visit Evidence of Weeds in Quadrant 1 P02_Quadrant 7 Free of Weeds Site Visit P02_Quadrant 7 Free of Weeds Site Visit 2	The annual revegetation monitoring survey undertaken on 28/10/2020 (R06) identified: <ul style="list-style-type: none"> • Quadrats 1, 2, and 7 did not meet completion criteria. • Quadrats 3, 4, 5 and 6 met completion criteria. <p>Quadrat 1, 2, and 7 recorded between 20% and 30% weed cover largely comprising <i>Briza sp.</i>, <i>Ehrharta sp.</i>, <i>Avena barbata</i>, <i>Lupinus cosentinii</i> and other grassy weed species.</p> <p>Quadrats 3, 4, 5 and 6 recorded weed foliage cover of 10% or less.</p> <p>Contingency actions as per the RMP are now being implemented to remediate weeds (refer RMP 56 for details). Infill planting is planned for winter 2021 and ongoing weed control is underway.</p> <p>Weed control in the revegetation area was undertaken on 14 occasions within the revegetation sites. Weed control undertaken at sites 2 and 7 post monitoring survey was successful, the site audit conducted on the 20/04/2021 noted weed cover less than 10%.</p> <p>As weed cover was assessed as greater than 10% in quadrant 1, 2 and 7 during the monitoring report this condition has been assessed as partially non-compliant. Since the revegetation monitoring survey was conducted on the 28/10/2020 and it was found that weed control was greater than 10%, further weed control was undertaken. Weed control in the revegetation areas was conducted 4 times post monitoring survey on the 24/11/2020, 25/11/2020, 26/11/2020 & 14/12/2020.</p> <p>No declared plants or weeds of national environmental significance were reported in the monitoring report.</p> <p>Recommendation: It is recommended that the frequency of weed control is increased, particularly in the northern end of the site around quadrant 1.</p>	PNC
RMP 4	Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ - Implement contingency measures as outlined in section 6 if grazing is observed on planted seedlings.	At completion.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 P04_2020 Infill Planting Corflute P05_2020 Planting Corflute Success Site inspection 20/04/2021	The annual monitoring report of revegetation and landscaping areas undertaken on 28/10/2020 states that there was no evidence of grazing by pest animals or insects within the landscape area. Within the revegetation areas, herbivory was noted on most Proteaceae species present within monitoring quadrats. No other grazing was identified in the monitoring report. Herbivory is due to grazing by kangaroos (as confirmed by discussions with Workpower and Strategen-JBS&G ecologists), which are entering the site from the south-west through a fauna underpass. Given fencing is cost prohibitive and impractical, infill planting is planned for 2021 on the north of the site (away from kangaroos), adjacent to the 2020 revegetation area. Corflute guards have been used within the revegetation and landscaping areas for the protection of seedlings.	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
RMP 5	<p>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ Establish local provenance species as detailed in Table 6 through seedling planting.</p> <p>Table 6: <i>Acacia saligna, Allocasuarina fraseriana, Banksia attenuata, Banksia baxteri, Banksia coccinea, Banksia hookeriana, Banksia nivea, Banksia sessilis, Corymbia calophylla, Corymbia ficifolia, Eremophila glabra, Eucalyptus marginata, Eucalyptus gomphocephala, Eucalyptus preissiana, Eucalyptus rudis, Grevillea bipinnatifida, Grevillea paniculata, Grevillea wilsonii, Hakea amplexicaulis.</i></p>	At completion.	Strategen-JBS&G_Lakelands ACR Rev 0 2019_042019	This criterion was deemed completed in the 2019 Annual Compliance Report.	C (complete)
RMP 6	<p>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ Ensure management actions as detailed in section 4 are complied with.</p>	Refer to item 17–23.	Refer to items RMP 10-15 and 17-23	Refer to items RMP 10-15 and 17-23	NA
RMP 7	<p>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ Plant a minimum of 6200 tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species of local within the 10.8 ha offset site.</p>	At completion.	Refer to RMP 2	Refer to RMP 2	C
RMP 8	<p>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site¹ Achieved 80% survival of planted potential breeding species and 80% survival of planted foraging species within the offset site ten years from the planting completion date.</p>	At completion.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	<p>The results of the annual revegetation monitoring survey undertaken on 01/02/2021 indicates that the target density for breeding species is 465 plants / ha (80% of 3000 plants over 5.16 ha). The recorded density was 471/ha ± 292 plants / ha.</p> <p>The target density for foraging species is 496 plants / ha (80% of 3200 plants over 5.16 ha). The recorded density was 514/ha ± 422 plants / ha.</p> <p>The density for breeding species has met this criterion however this criterion cannot be deemed complete until the final 10-year monitoring. The density for foraging has met this criterion; however, this criterion cannot be deemed complete until the final 10-year monitoring.</p>	C
RMP 9	<p>Section 4.1.1 Revegetation areas Seedlings will be propagated in an accredited nursery from seed collected from within a 50 km radius of the revegetation site. This radius may need to be extended if the relevant local government have restrictions on seed collection at the time seed collection is required.</p>	Prior to revegetation activities taking place.	R03_Lakelands East ACR (Rev 0) 2020 C04_Lakelands East EPBC approval 2013_7048_SEC_OFFICIAL_ C09_DAWE Conformation of Seedling being sourced from outside the 50km limit C06_Tranen Seed Propagation and NASIA Certificate P06_2020 Infill Planting Success – group P07_2020 Infill Planting Success – singular P08_2020 Infill Planting	<p>Seed collected between 2012-2015, used for the “revegetation areas” has come from local provenance collected within a 50 km radius of the revegetation site. Workpower maintain a NIASA accredited wholesale nursery, with seedlings used for infill in the revegetation areas.</p> <p>Notification was received from DAWE on 24/06/2020 confirming that the Environment Compliance Branch will not take any compliance action against the approval holder regarding the need to utilise seedlings with provenance beyond 50 kms from the revegetation site. This was due to the primary revegetation contractors being unable to find any nurseries and plant distributors able to source seeds that would meet this criteria.</p> <p>Tranen were the contractor responsible for the sourcing and planting of seeds for the 2020 planting. Tranen sourced the seed from a NIASA accredited wholesale nursery, with seedlings used for infill in the revegetation areas.</p> <p>Seed collected for the 2020 winter infill planting was collected from a range of areas: <i>Acacia saligna</i> – Bibra Lake Region <i>Eucalyptus gomphocephala</i> – Yanchep <i>Eucalyptus gomphocephala</i> – Roe highway Extension Project <i>Eremophila glabra</i> – Unknown – cuttings from stock <i>Hakea prostrata</i> – Wanneroo <i>Hakea lissocarpa</i> - Eneabba</p> <p>All of the species that were planted are listed in the Revegetation Management Plan.</p> <p>The 2020 monitoring report and 2021 site audit confirmed that the seedlings planted during the 2020 infill planting had survived.</p>	C
RMP 10	<p>Table 3: Management actions (revegetation areas) Undertake a site inspection to identify the weed species, locations and abundance within revegetation areas.</p>	Prior to revegetation activities taking place.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	The annual revegetation monitoring survey undertaken on 01/02/2021 (M_001) identified weed species, locations and abundance within the revegetation areas.	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
RMP 11	Table 3: Management actions (revegetation areas) 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.	Prior to seedling planting taking place in accordance with chemical specifications.	R03_Lakelands East ACR (Rev 0) 2020 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	Infill Planting was required during the 2020 period. Infill planting occurred on the 31/08/2020. Prior to infill planting, weed control in the revegetation area occurred on the 15/01/2020, 10/02/2020, 07/05/2020, 08/05/2020, 12/05/2020, 24/07/2020, 29/07/2020 & 04/08/2020.	C
RMP 12	Table 3: Management actions (revegetation areas) Undertake seedling planting as described in Section 4.3.	After the completion of initial weed control.	R03_Lakelands East ACR (Rev 0) 2020 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 C06_Trannen Seed Propagation and NASIA Certificate R04_Lakelands Infill Planting Dates P06_2020 Infill Planting Success – group P07_2020 Infill Planting Success – singular P08_2020 Infill Planting	Historic seedling planting has been undertaken as per Section 4.3 and has been deemed as compliant during previous audits. Infill planting was undertaken in August 2020, it is also planned for July 2021. Photos taken directly after the August 2020 infill planting was completed by Trannen revegetation systems confirm that infill planting was undertaken as described in section 4.3. Tree guards were observed throughout the revegetation area. Tree guards used in the 2020 infill planting were corflute – corflute is used as they offer more protection and better results against damage caused by fauna and wind, however, only require one wooden stake. The design can be seen in R04. This PNC is minor in nature and largely administrative. The requirement to use three stakes in every tree guard is no longer warranted due to a more rigid and sturdy tree guard being available. Recommendation: The Requirement for 3 stakes per tree guard should be removed from the RMP and updated to reflect current ‘best practices’.	PNC
RMP 13	Table 3: Management actions (revegetation areas) Install a minimum of three stakes and a protective guard around each seedling to provide micro-climate control and protect the vegetation from grazing by feral and native herbivorous animals (i.e., rabbits and kangaroos) and wind damage.	After seedling planting.	P04_2020 Infill Planting Corflute P05_2020 Planting Corflute Success Site inspection 20/04/2021 R04_Lakelands Infill Planting Dates	Tree guards can be seen to be installed around planted seedlings in the 2021 revegetation monitoring report. Photos taken immediately after planting show that tree guards were installed around the seedlings. Tree guards installed around planted seedlings to provide protection from grazing animals were observed by the auditors during the site inspection on 20/04/2021. Tree guards were still in place 8 months after the planting occurred. Tree guards used in the 2020 infill planting were corflute – Corflute is used as they offer more protection and better results against damage caused by fauna, however, only use one wooden stake. The design can be seen in R04. Recommendation: The Requirement for 3 stakes per tree guard should be removed from the RMP and updated to reflect current ‘best practices’.	PNC
RMP 14	Table 3: Management actions (revegetation areas) Ensure all plants and other materials used in revegetation are free of dieback and weeds.	Prior to revegetation activities taking place.	R03_Lakelands East ACR (Rev 0) 2020 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 C06_Trannen Seed Propagation and NASIA Certificate	Infill planting occurred in 2020. Plants and other materials were sourced from a NAISIA approved nursery with no dieback or weeds.	C
RMP 15	Table 3: Management actions (revegetation areas) Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering revegetation areas.	At all times.	C03_Workpower Weed Control and Dieback R01_Workpower Lakelands East Revegetation Area pre-start Hygiene Inspection Checklist - Dieback Guidelines and preventative measures 202021	Workpower are contracted by Peet to undertake works within the revegetation areas. Workpower advised that all key staff have completed Dieback Protection in Bushland training at Murdoch (ACHPMG302A – Control Plant Pests, Diseases and Disorders) and follow the Dieback Working Group Guidelines. Workpower are a member of the Dieback Working Group. A completed pre-start hygiene inspection checklist for the Lakelands East revegetation area was provided for 28 occasions between 15 February 2020 to 10 February 2021 declaring footwear, vehicle and equipment were free of mud, soil prior to site entry.	C
RMP 16	Section 4.1.2 Landscaping area Seedlings will be propagated in an accredited nursery from seed collected from within a 50 km radius of the revegetation site. This radius may need to be extended if the relevant local government have restrictions on seed collection at the time seed collection is required.	Prior to revegetation activities taking place.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 C02_RE_Lakelands 2021 Annual Compliance Report	Assessment of this item in the previous ACRs (2016 to 2020) is still applicable to this audit period which identified: Seed collected in 2012-2015 has come from local provenance collected within a 50 km radius of the revegetation site. Workpower maintain a NIASA accredited wholesale nursery, with seedlings used for infill in the revegetation areas.	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
				No infill planting in the landscaping areas occurred in the 2020 audit period. Confirmation of this was received from PEETs landscaping contractors 'EPCAD'	
RMP 17	Table 4: Management actions (landscaping areas in the offset site) Undertake a site inspection to identify the weed species, locations and abundance within the landscaping areas.	Prior to revegetation activities taking place.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	The annual revegetation monitoring survey undertaken on 01/02/2021 identified weed species, locations and abundance within the landscaping area.	C
RMP 18	Table 4: Management actions (landscaping areas in the offset site) Undertake weed control (as described in section 4.1.2) at the landscaping areas based on the results of the site inspection at least twice prior to commencing revegetation activities.	Prior to seedling planting taking place in accordance with chemical specifications.	R03_Lakelands East ACR (Rev 0) 2020 R02_Horizon West Lakelands Chem Spray Diary 03.20-03.21	Based on the results of the 2019 survey, no further infill planting was considered necessary for the landscaping area during this audit period An operation and location register for chemical spraying at Lakelands black swan lake from Peet's landscaping area vegetation and weed control contractor Horizon West, showed that weed control in the form of spot spraying was undertaken in the landscaping area on at least 26 occasions during the audit period. It stated signage, weather conditions, and rate of application each time weed control was undertaken.	C
RMP 19	Table 4: Management actions (landscaping areas in the offset site) Undertake ongoing maintenance weed control as described in section 4.1.2.	Biannually (as necessary) until responsibility of managing the revegetation site is transferred to City of Mandurah.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 R_02_Horizon West Lakelands Chem Spray Diary 03.20-03.21	As per RMP 18, ongoing maintenance weed control in the form of spot spraying was undertaken in the landscaping area on 26 occasions (4 rounds) during the audit period.	C
RMP 20	Table 4: Management actions (landscaping areas in the offset site) Undertake seedling planting as described in Section 4.3.	After the completion of initial weed control.	R03_Lakelands East ACR (Rev 0) 2020 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	Historical seedling planting has been undertaken as per Section 4.3 and has been deemed as compliant during previous audits. No infill planting of seedlings was undertaken in the landscaping area during this audit period.	C
RMP 21	Table 4: Management actions (landscaping areas in the offset site) Install a minimum of three stakes and a protective guard around each seedling to provide micro-climate control and protect the vegetation from grazing by feral and native herbivorous animals (i.e., rabbits and kangaroos) and wind damage.	After seedling planting.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	No infill planting of seedlings was undertaken in the landscaping area during this audit period.	NA
RMP 22	Table 4: Management actions (landscaping areas in the offset site) Ensure all plants and other materials used in revegetation are free of dieback and weeds.	Prior to revegetation activities taking place.	R03_Lakelands East ACR (Rev 0) 2020 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	As reported in the 2019 audit report, infill planting was last undertaken in winter 2018 as a result of the 2017 survey. Based on the results of the 2020 survey, no further infill planting was considered necessary for the landscaping area in 2021.	C
RMP 23	Table 4: Management actions (landscaping areas in the offset site) Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering landscaping areas.	At all times.	C02_Horizon West Weed Control and Dieback C08_Horizon West Dieback Sign on Sheet October	Correspondence from Horizon West on 29 March 2021 stated that no Horizon West maintenance vehicles enter the Black Swan Lake landscaping area and confirmed that Horizon West are contracted to carry out general maintenance within Lakelands for PEET. Horizon West comply with health and hygiene protocol as outlined in the Black Swan Swamp Revegetation Management Plan September 2017. All personal use boot cleaners for all sites, on top of the machinery and vehicle cleaning. A signed site inspection sheet was submitted, the sign on sheet identified that dieback was a hazard at the site and that phytoclean is present in vehicles to clean boots after walking through the area. A photo was included showing boot cleaners, spray bottles and phytoclean available. A toolbox talk information sheet providing information on the impact of dieback and workplace controls was also sighted.	C
RMP 24	Section 4.2 Weed control techniques will comprise of chemical controls identified in Table 5 Table 5: Initial broad scale spray herbicide application (using towed boom spray rigs) Spot spray herbicide application Stem injection, cut and paint.	At all times.	C02_Horizon West Weed Control and Dieback C08_Horizon West Dieback Sign on Sheet October	Correspondence received from Horizon West on 29 March 2021 confirmed that they conducted chemical weed control through spot spraying within the landscaping area during the audit period. Correspondence received from Work Power on the 06/04/2021 indicated that they conducted weed control through spot spraying on 28 different occasions (4 rounds) during the audit period	C
RMP 25	Section 4.2 Weed control will commence in winter, prior to revegetation activities commencing. This will be in the form of a broad scale weed spray over the revegetation site to reduce initial weed loads prior to planting.	Prior to revegetation activities taking place.	R_04 Lakelands Infill Planting Dates	Infill planting was required in the revegetation zone in the northern end of the project. This zone can be seen in figure 1 of the Lakelands revegetation monitoring report 01/02/2020. Weed control occurred in the winter prior to the revegetation activities. Infill planting occurred on the 31/08/2020. Weed control occurred in winter on the 08/05/2020, 12/05/2020, 24/07/2020, 29/07/2020 & 04/08/2020, all prior to the infill planting.	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
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.	C02_Horizon West Weed Control and Dieback C03_Workpower Weed Control and Dieback	Management advised that Workpower (revegetation areas) and Horizon West (landscaping areas) undertook spot spraying for weeds during the current audit period. Confirmation was also received from both of the contractors. Infill planting occurred on the 31/08/2020 in the revegetation area. Weed control was undertaken in the revegetation area on the 16/09/2020, 18/09/2020, 24/11/2020, 25/11/2020.	C
RMP 27	Section 4.2 Weed control will be undertaken by Peet until handover of management to the site to the City of Mandurah.	Until handover of management to the site to the City of Mandurah.	R03_Lakelands East ACR (Rev 0) 2020	Management advised that PEET and their contractors have undertaken all weed control on site to date. Handover to the City of Mandurah (CoM) is not expected until approximately 4 year's time.	C
RMP 28	Section 4.3 Plants used in revegetation activities will be propagated from native seed collected from the local area. Seed will be collected from a 50 km radius from the revegetation site by licensed seed collectors.	Refer to RMP 9.	Refer to RMP 9 and 16	Refer to RMP 9 and 16	C
RMP 29	Section 4.3 Only species defined within EPBC 2013/7048 as potential breeding or foraging species for black cockatoos (Tuart, Marri, Jarrah, <i>Acacia saligna</i> , <i>Banksia attenuata</i> , <i>Banksia grandis</i> , <i>Banksia menziesii</i> and <i>Allocasuarina fraseriana</i> species) will be considered as part of the 6200 plants that are required to be planted.	At all times.	Refer to RMP 5 and 7 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	As per 2020 Annual Compliance Report, the species of all the 6200 seedlings planted are as per the defined list. Infill planting was conducted in quadrant 7 during the 2020 audit period. <i>Acacia saligna</i> and <i>Eucalyptus gomphocephala</i> were planted. <i>Acacia saligna</i> is a black cockatoo feeding species and <i>Eucalyptus gomphocephala</i> is a feeding, nesting, and roosting species.	C
RMP 30	Section 4.3 Seed collection will be undertaken in late-spring to summer of the year preceding planting activities.	Late-spring to summer of the year preceding planting activities.	C06_Tranen Seed Propagation and NASIA Certificatev	Seed collection was not undertaken in late spring to summer of 2019 for the infill planting. Seed used for infill planting in 2020 was collected over a broad period of time: <i>Acacia saligna</i> – 2015 <i>Eucalyptus gomphocephala</i> – 2011 <i>Eucalyptus gomphocephala</i> – N/A <i>Eremophilla glabra</i> – Unknown – 2019 <i>Hakea prostrata</i> – 2016 <i>Hakea lissocarpa</i> -2017 Standard nursery practice is to undertake seeding between October to December of the previous year. Seeding occurred between spring and summer in 2019 and were planted in August 2020. Recommendation: If planting is required, efforts to collect seed in late spring to summer of the previous year should be made or this action should be amended to state that seeding in nurseries is to occur in late spring to summer removing the timeframe on seed collection. .	PNC
RMP 31	Section 4.3 Due to the nature of the revegetation site (i.e., overstorey species and limited good quality topsoil), habitat creation will be focussed on seedling planting rather than direct seeding to maximise potential for revegetation success. As a result, no initial site works (e.g., ripping, scarifying or topsoil transfer) will be required.	During seedling planting.	Refer to RMP2 and 12	Refer to RMP 2 and 12	C
RMP 32	Section 4.3 Seedling planting will be undertaken in early winter, within one month of the first rains.	Early winter, within one month of the first rains.	R06_strategen-JBS&G_Lakelands 2020 revegetation monitoring _01022021 R04_Lakelands's infill planting dates P02_Quadrant 7 Free of Weeds Site Visit P03_Quadrant 7 Free of Weeds Site Visit 2 P09_Quadrant 7	Infill Planting occurred in 2020. The Strategen-JBS&G Lakelands Revegetation Monitoring Report 2021 confirms that infill planting occurred in the northern section of the site during winter 2020. The planting did not occur within 1 month of the first rain, although this action is to ensure the survival of planted stock. Based on monitoring undertaken in Spring, this revegetated area is meeting survival related completion criteria, this PNC is minor in nature. The site inspection confirmed that infill planting was successful with low/no mortality rates. Recommendation: It is recommended that future infill planting occurs within one month of the first winter rain or the management plan is amended to allow for flexibility in planting works based on site and seasonal context.	PNC
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.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	The annual revegetation monitoring survey 28/10/2020 identified that the target stocking rate is currently being met, therefore no contingency actions were required to be implemented during the audit period.	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
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.	R03_Lakelands East ACR (Rev 0) 2020 C06_Tranen Seed Propagation and NASIA Certificate	Infill planting occurred in winter 2020, the tubestock that was used was 6-12 months old. Standard nursery practice to undertake seeding between October to December of the previous year. Seeding occurred between planting occurred in August 2020.	C
RMP 35	Section 4.3 Tubestock should also not be root bound and planting should be undertaken as follows: <ul style="list-style-type: none"> optimal location of each species at the site should be chosen at the time of planting to ensure appropriate condition for each species (e.g., topography, shade/sun, soil moisture etc) seedling should be planted so that the stem is vertical and the base of the plant is slightly below the original soil surface soil surrounding the seedling root ball should be pressed in firmly to avoid air pockets a minimum of three stakes and a protective guard manufactured for such purpose should be placed around the seedling to protect the vegetation from grazing and wind damage. 	During revegetation.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 R04_Lakelands Infill Planting Dates Site visit 20/04/2021 P06_2020 Infill Planting Success – group P07_2020 Infill Planting Success – singular P08_2020 Infill Planting C11_Strategen-JBSG_Herbivory in Southern Revegetation Area	Infill planting was undertaken on 30/08/2020. As seen in the photos of R04, Planting was at an optimal location and in particular, an area with minimal vegetation in the designated revegetation area of the Black Swan Lake. The site was also chosen due to its northern location, due to herbivory planting occurred on the north of the site (away from kangaroos). Corflute tree guards have been used within the revegetation and landscaping areas for the protection of seedlings. Corflute tree guards only utilise one wooden stake. Although the Corflute tree guards were still upright 8 months after planting, this is not following the methodology in the Revegetation Management Plan. The site inspection confirmed that the 2020 infill planting was successful. Recommendation: The Requirement for 3 stakes per tree guard should be removed from the RMP and updated to reflect current 'best practice'.	PNC
RMP 36	Section 4.3 If during monitoring plant stress is observed a wetting agent or additional watering options will be investigated as described in Table 10.	Refer to item 55.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	Refer to RMP 55. Results of annual monitoring of revegetation and landscaping areas on 28/10/2020 did not identify water stress in seedlings planted.	NA
RMP 37	Section 4.3 If monitoring determines that revegetation requires supplementary seedling planting in subsequent years, this will be undertaken prior to the main winter rainfall, within one month of the first rains and following the required soil preparation and weed treatment as described in Table 10.	Refer to item 52.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 P06_2020 Infill Planting Success – group P07_2020 Infill Planting Success – singular P08_2020 Infill Planting	Monitoring that occurred in 2019 determined that infill planting was required during the 2020 audit period as a contingency measure that was triggered by weeds and increased mortality rates amongst previously planted revegetation species. Infill planting was undertaken in Winter 2020. The planting was not undertaken within one month of the first winter rain, although this action is to ensure the survival of planted stock. Based on monitoring undertaken in Spring, this revegetated area is meeting survival related completion criteria, so this will be minor in nature. This was confirmed during the site audit 20/04/2021, the auditor confirmed that the tubestock that were planted in the 2020 infill planting survived with no/low mortality rates. Recommendation: It is recommended that future infill planting occurs within one month of the first winter rain prior to the main winter rainfall or the management plan is amended to allow for flexibility in planting works based on site and seasonal context.	PNC
RMP 38	Section 4.4 Tree guards are to be installed around planted seedlings which will provide protection from browsing animals.	Refer to item 35.	Site inspection on 20/04/2021 P04_2020 Infill Planting Corflute P05_2020 Planting Corflute Success P08_2020 Infill Planting	Tree guards can be seen to be installed around planted seedlings in the 2021 revegetation monitoring report. Photos taken immediately after planting show that tree guards were installed around the seedlings. Tree guards installed around planted seedlings were observed by the auditors during the site inspection in 2021 to provide protection from browsing animals.	C
RMP 39	Section 4.5 Hygiene measures To reduce the risk of introducing dieback into the offset site, seed sources to be used in tubestock will be propagated by a NIASA (Nursery Industry Accreditation Scheme of Australia) accredited nursery.	Prior to revegetation activities taking place.	Management advice on 3 February 2020 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 C06_Tranen Seed Propagation and NASIA Certificate	Seedlings that were used in the 2020 infill planting were dieback free and propagated by a NAISA accredited nursery	C
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.	C03_Workpower Weed Control and Dieback R01_Workpower Lakelands East Revegetation Area pre-start Hygiene Inspection Checklist - Dieback Guidelines and preventative measures 202021 C02_Horizon West Weed Control and Dieback C08_Horizon West Dieback Sign on Sheet October	Refer to RMP 15 and 23. The revegetation area contractor, Workpower provided a completed pre-start hygiene inspection checklist for the Lakelands East revegetation area was provided for 28 occasions (4 rounds) between 15 February 2019 to 10 February 2020 declaring footwear, vehicle and equipment were free of mud, soil prior to site entry. Revegetation areas were compliant with this requirement. The landscaping area contractor, Horizon West provided Correspondence on 29 March 2021 stating that no Horizon West maintenance vehicles enter the Black Swan Lake landscaping area and confirmed that Horizon West are contracted to carry out general maintenance within Lakelands for PEET. Horizon West also stated they comply with health and hygiene	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
			R07_Horizon West Pre-Start Inspection 13102020	<p>protocol as outlined in the Black Swan Swamp Revegetation Management Plan September 2017. All personal use boot cleaners for all sites, on top of the machinery and vehicle cleaning noted in the above attachments.</p> <p>A signed site inspection sheet was submitted, the sign on sheet identified that dieback was a hazard at the site and that phytoclean is present in vehicles to clean boots after walking through the area. A photo was included showing boot cleaners, spray bottles and phytoclean available. A toolbox talk information sheet regarding dieback.</p>	
RMP 41	<p>Section 4.7 Conservation mechanism A conservation covenant under one of the following legislative mechanisms will be applied over the offset site by 30 June 2019: Transfer of Land Act 1893 Soil and Land Conservation Act 1945 National Trust of Australia (WA) Act 1964.</p>	By 30 June 2020.	R09_Lakelands Record of Certificate of Title R11_Document Restrictive Covenant in Deed O355250_1	A Record of Certificate of Title for Lakelands East was provided, numbered item 16 states a Restrictive Covenant to City of Mandurah as to Portion only was registered 11/03/2020. Additional details on the Restrictive Covenant can be seen in R11 showing the agreement between the City of Mandurah and Peet.	C
RMP 42	<p>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.</p>	Every three years.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 P09_Quadrant 7	<p>The annual revegetation monitoring survey undertaken on 28/10/2020 stated six permanent 10 m by 10 m monitoring plots were assessed within the revegetation area.</p> <p>A seventh monitoring plot was established after additional infill planting carried out in 2020.</p> <p>It was noted that revegetation monitoring is being undertaken annually which is more frequent than required by the RMP (every 3 years).</p>	C
RMP 43	<p>Section 5.1.1 Revegetation areas Each plot will be divided into five 1 m x 1 m quadrats based on a method provided by Dr Eleanor Bennett (Bennett E [Bennett Environmental Consulting Pty Ltd] 2012, pers. comm. 10 September).</p>	Every three years.	C15_Strategen-JBS&G Revegetation monitoring methods_18022020 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A)	Correspondence from the revegetation monitoring consultant advised that this monitoring method is useful as a "subsampling" method for rehabilitation sites with very high plant density. Plant density is recorded within each subplot and then averaged over the total area of all the subplots within the rehabilitation area. However, plant density at Lakelands has not reached a sufficient level to require subsampling; rather, a total count of all plants within each 10 x 10m quadrat was undertaken. This ultimately provides a more accurate record of plant density than subsampling.	NA
RMP 44	<p>Section 5.1.1 Revegetation areas Data will be collected from each of the five 1 m x 1 m quadrats, in order to enable collection of representative data from each quadrat. Data collected from each quadrat will include:</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.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	<p>The annual revegetation monitoring survey/report undertaken on 01/02/2021 and data was collected on the required parameters.</p> <p>Data collected from each quadrant included:</p> <ul style="list-style-type: none"> flora species composition vegetation structure density of flora species. Numbers of trees will be recorded from the entire 10 m by 10 m monitoring plot to obtain an appropriate representative sample. 	C
RMP 45	<p>Section 5.1.1 Revegetation areas Each plot will be monitored every three years during spring (commencing in spring 2019) as per Table 8 until handover (anticipated to be handed over to CoM in 2026).</p>	Every three years.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	The annual revegetation monitoring survey was undertaken on 28/10/2020 within the revegetation area. It was noted that revegetation monitoring is being undertaken annually which is more frequent than required by the RMP (every 3 years).	C
RMP 46	<p>Section 5.1.2 Landscaping areas Landscaping areas within the offset site will be monitored at the same time as revegetation areas. Monitoring within landscaping areas will comprise of a visual observation of plant health. Any occurrences of the following will be recorded:</p> <ul style="list-style-type: none"> plant stress plant mortality weed species. 	Every three years.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	Observations in landscaping areas were undertaken on 28/10/2020 at the same time as the revegetation monitoring was undertaken. Observations included a visual assessment of plant health, recording instances of stress and mortality in native plants; in addition, information relating to weed presence and foliage cover was recorded and photographed.	C
RMP 47	<p>Table 9: Monitoring program for revegetation and landscaping areas within the offset site Opportunistic observation during monitoring: a. Plant health (i.e., evidence of water stress, pests, animal grazing).</p>	3 yearly.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	Annual monitoring for the revegetation and landscaping areas was undertaken on 28/10/2020 and included observations on plant health (e.g., plant stress, mortality and grazing) in both areas.	C
RMP 48	<p>Table 9: Monitoring program for revegetation and landscaping areas within the offset site Monitoring of quadrats. a. Plant density b. Species richness c. Plant health (i.e., evidence of water stress, pests, animal grazing).</p>	3 yearly.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 R_002_strategen-JBS&G_Lakelands RMP Rev 6_092017	Monitoring of seven permanent quadrats established within the revegetation area were assessed on 28/10/2020 and included species composition of planted flora, abundance of each planted flora species and native plant health. Monitoring of quadrats within the landscaping area is not a requirement of the RMP.	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
RMP 49	Table 9: Monitoring program for revegetation and landscaping areas within the offset site Observation during monitoring. a. Weed species.	Annually until handover to the CoM.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	Annual monitoring of weed species in the revegetation and landscaping areas was undertaken on 28/10/2020. Monitoring included observations and recordings of weed species cover (revegetation areas) and weed presence and foliage cover (landscaping areas).	C
RMP 50	Section 6: Contingency measures Contingency actions will be initiated if monitoring indicates that management actions detailed for revegetation areas (Table 3) and landscaping areas within the offset site (Table 4) have not been successful or effective and/or completion criteria are not being achieved (Table 10).	Every three years.	R03_Lakelands East ACR (Rev 0) 2020 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 C02_Horizon West Weed Control and Dieback C03_Workpower Weed Control and Dieback R02_Horizon West Lakelands Chem Spray Diary 03.20-03.21 R05_BSL weed control 2020 Program Quote 3 P02_Quadrant 7 Free of Weeds Site Visit P03_Quadrant 7 Free of Weeds Site Visit 2 P10_Quadrant 2	Table 10 of the RMP applies to the contingency measures in the revegetation area. The previous audit report found that weed cover and tree mortality did not meet the criteria in table 10, all other completion criteria were met. Although the 2020 monitoring report identified that the target density for breeding species and foraging species is over 80%, the spring 2019 monitoring period identified increased mortality rates amongst previously planted revegetation species and as such additional infill planting was undertaken along the northern section of the revegetation site in August 2020. In response to the additional area of planting, a permanent 10 x 10 m monitoring quadrat was established east of quadrat one. This planting was undertaken in August 2020. The annual revegetation monitoring survey undertaken on 28/10/2020 (M01) identified Quadrats 1, 2, and 7 did not meet weed completion criteria. Quadrats 3, 4, 5 and 6 met weed completion criteria. Quadrat 1, 2, and 7 recorded between 20% and 30% weed cover, largely comprising Briza sp., Ehrharta sp., Avena barbata, Lupinus cosentinii and other grassy weed species. Quadrats 3, 4, 5 and 6 recorded weed foliage cover of 10% or less. After identifying that there was greater than 10% weed cover in quadrats 1, 2 and 7 and the completion criteria had not been achieved, weed control in the revegetation areas was conducted 4 times as a contingency measure. This occurred on the 24/11/2020, 25/11/2020, 26/11/2020 & 14/12/2020. The site audit identified that weed control undertaken post monitoring survey at quadrants 2 and 7 had been successful in reducing weed cover. Further infill planting and weed control are both planned for the 21/22 reporting period as contingency measures for completion criteria.	C
RMP 51	Section 6: Contingency measures Where contingency actions are required to be implemented, they will be reported to DotE as part of the EPBC Act annual environmental reporting requirements, as detailed in Section 8.	As required.	R03_Lakelands East ACR (Rev 0) 2020 R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021 P11 Peet Website 2021 ACR 2020	Contingency measures are reported to the DotE (now DAWE) in the annual ACR reports which are published annually on the Peet website (refer EPBC 8.1).	C
RMP 52	If any of the 3 yearly assessment reports determine that survival rates of planted potential breeding species or planted foraging species are below 80 percent. 1. Identify cause. 2. Implement approach to remedy cause which could include: • collecting additional provenance seed for plant propagation to compensate for the insufficient native plant species richness and/or cover • undertaking infill seedling planting within 12 months of the date of survey • application of additives such as Seasol, water granules, soil breaker, water retainer, wetting agent or fertiliser tablets as deemed necessary by revegetation contractor. • further weed and/or pest control if required post infill planting. 3. Monitor success of contingency measure(s).	As required.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	The 2020 Revegetation Monitoring Survey conducted on 28/10/2020 identified that the target density for breeding species is 465 plants / ha (80% of 3000 plants over 5.16 ha). The recorded density was 471/ha ± 292 plants / ha. The target density for foraging species is 496 plants / ha (80% of 3200 plants over 5.16 ha). The recorded density was 514/ha ± 422 plants / ha. No contingency measures were required	C
RMP 53	Approximately 20% of seedlings planted show evidence of damage by animal (i.e., grazing). 1. Implement measures to prevent further damage which could include: • 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	As required.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	Annual monitoring of revegetation and landscaping areas undertaken on 28 October 2020. There was no grazing by pest animals or insects observed on seedlings planted within the landscaping area. Inspection of revegetation areas for evidence of herbivory was undertaken in all rehabilitation areas to determine overall site vegetation health and sources of potential stressors. Herbivory was noted on most Proteaceae species present within monitoring quadrats. Herbivory is due to grazing by kangaroos (as confirmed by discussions with Workpower and Strategen-JBS&G ecologists), which are entering the site from the south-	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
	<ul style="list-style-type: none"> providing alternate species suitable to the site and provenance requirements. Monitor success of contingency measure(s). 			<p>west through a fauna underpass. Given fencing is cost prohibitive and impractical, infill planting is planned for 2021 on the north of the site (away from kangaroos), adjacent to the 2020 revegetation area.</p> <p>Success of the contingency measures will be monitored during the 2021 revegetation monitoring survey.</p>	
RMP 54	<p>Approximately 20% of seedlings planted show evidence of damage by pests.</p> <ol style="list-style-type: none"> Implement measures to prevent further damage which could include: <ul style="list-style-type: none"> animal control program installation of temporary fencing application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required applying wetting agent or supplementary watering removing damaged plants and replanting providing alternate species suitable to the site and provenance requirements. Monitor success of contingency measure(s). 	As required.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	<p>Annual monitoring of revegetation and landscaping areas was undertaken on 28 October 2020. There was no grazing by pest animals or insects observed on seedlings planted within the landscaping area.</p> <p>Inspection of revegetation areas for evidence of herbivory was undertaken in all rehabilitation areas to determine overall site vegetation health and sources of potential stressors. Herbivory was noted on most Proteaceae species present within monitoring quadrats. As a contingency measure, infill planting is planned for winter 2021.</p> <p>Success of the contingency measures will be monitored during the 2021 revegetation monitoring survey.</p>	C
RMP 55	<p>Approximately 20% of seedlings planted show evidence of water stress.</p> <ol style="list-style-type: none"> Implement measures to prevent further damage which could include: <ul style="list-style-type: none"> animal control program installation of temporary fencing application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required applying wetting agent or supplementary watering removing damaged plants and replanting providing alternate species suitable to the site and provenance requirements. Monitor success of contingency measure(s). 	As required.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	Results of annual monitoring of revegetation and landscaping areas on 28/10/2020 did not identify water stress in seedlings planted.	NA
RMP 56	<p>No greater than 10% weed cover No Declared Plants or weeds of national environmental significance</p> <ol style="list-style-type: none"> Investigate cause (e.g. adjacent sources of weed seed). Implement measures to remove weeds (e.g. weed control) as practicable. Monitor success of contingency measure(s). 	As required.	<p>R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021</p> <p>P01_Site Visit Evidence of Weeds in Quadrant 1</p> <p>P02_Quadrant 7 Free of Weeds Site Visit</p> <p>P03_Quadrant 7 Free of Weeds Site Visit 2</p> <p>P10_Quadrant 2</p>	<p>The annual revegetation monitoring survey undertaken on 28/10/2020 (M01) identified Quadrats 1, 2, and 7 did not meet completion criteria. Quadrats 3, 4, 5 and 6 met completion criteria.</p> <p>Quadrat 1, 2, and 7 recorded between 20% and 30% weed cover. Quadrats 1, 2, and 7 contained heavy weed infestations, largely comprising <i>Briza sp.</i>, <i>Ehrharta sp.</i>, <i>Avena barbata</i>, <i>Lupinus cosentinii</i> and other grassy weed species.</p> <p>Quadrats 3, 4, 5 and 6 recorded weed foliage cover of 10% or less.</p> <p>Contingency actions as per the RMP are now being implemented to remediate weeds. Infill planting is planned for winter 2021 and ongoing weed control is underway.</p> <p>Weed control in the revegetation area occurred on the 15/01/2020, 10/02/2020, 07/05/2020, 08/05/2020, 12/05/2020, 24/07/2020, 29/07/2020, 04/08/2020, 16/09/2020, 18/09/2020, 24/11/2020, 25/11/2020, 26/11/2020 & 14/12/2020.</p> <p>Since the revegetation monitoring report was conducted on the 28/10/2020 weed control in the revegetation areas was conducted 4 times during the auditing period, on the 24/11/2020, 25/11/2020, 26/11/2020 & 14/12/2020.</p> <p>No declared plants or weeds of national environmental significance were identified during the monitoring.</p> <p>Success of the contingency measures will be monitored during the 2021 revegetation monitoring survey. However, it was noted at the site visit that quadrats 2 and 7 had low quantities of weeds, likely due to the weed control undertaken during the monitoring report.</p>	C
RMP 57	<p>Unauthorised access (people and vehicles).</p> <ol style="list-style-type: none"> Implement measures to prevent further unauthorised access (e.g. installation of temporary fencing and signage), as practicable. Monitor success of contingency measure(s). 	As required.	<p>Site inspection 20/04/2021</p> <p>R03_Lakelands East ACR (Rev 0) 2020</p>	<p>The northern sides of the landscaping and revegetation sites have been opened to the public. Management has previously advised that fencing and cameras are installed along the site boundary fence as needed and that it is impractical to implement further prevention measures.</p>	C

Reference	Condition	Timing	Evidence	Comments	Conformance status
				No evidence of damage due to unauthorised access was noted during the site audit (20/04/2021)	
RMP 58	Section 7 Plan implementation This RMP will be implemented by Peet until responsibility of the revegetation site is transferred to the City of Mandurah (CoM).	Until responsibility of the revegetation site is transferred to the City of Mandurah.	R03_ Lakelands East ACR (Rev 0) 2020	PEET maintained responsibility of the implementation of the RMP throughout the audit period. Handover from PEET to the CoM is not scheduled for approximately 4 years	C
RMP 59	Section 7 Plan implementation The revegetation site will be vested as Crown Reserve designated as Public Open Space (POS), with management vested to the City of Mandurah under Section 152 of the <i>Planning and Development Act 2005</i> .	At handover.	R06_Strategen_JBS&G Lakelands 2020 Revegetation monitoring (Rev A) 01022021	Handover from PEET to the CoM is not scheduled for approximately 4 years	NA
RMP 60	Section 7.1 Roles and responsibilities All contractors and staff will be required to operate in accordance with this RMP.	At all times.	P04_2020 Infill Planting Corflute P05_2020 Planting Corflute Success P06_2020 Infill Planting Success – group P07_2020 Infill Planting Success – singular P08_2020 Infill Planting	<p>Management advised that all contractors and staff are required to operate in accordance with the RMP.</p> <p>Workpower and Horizon West were both conformant with dieback and hygiene procedures (refer to RMP 40 for details).</p> <p>Seedling planting was not undertaken in accordance with the Revegetation Management Plan. The outcome of the 2020 infill planting was extremely successful, which is the overall goal of the revegetation management plan. However, non-conformances with the methodology stated in the RMP were noted.</p> <p>Refer to RMP, 3, 12, 30, 32 & 37 for further details regarding non-conformances.</p> <p>Recommendation: It is recommended that the Revegetation Management Plan is amended to increase flexibility regarding seedling planting times, tree guards and seed collection.</p>	PNC

Notes:

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

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