



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

Peet Mandurah Syndicate Limited

2026 Annual Compliance Report (Rev 0)

70197 | 175,566 (Rev 0)

4 May 2026

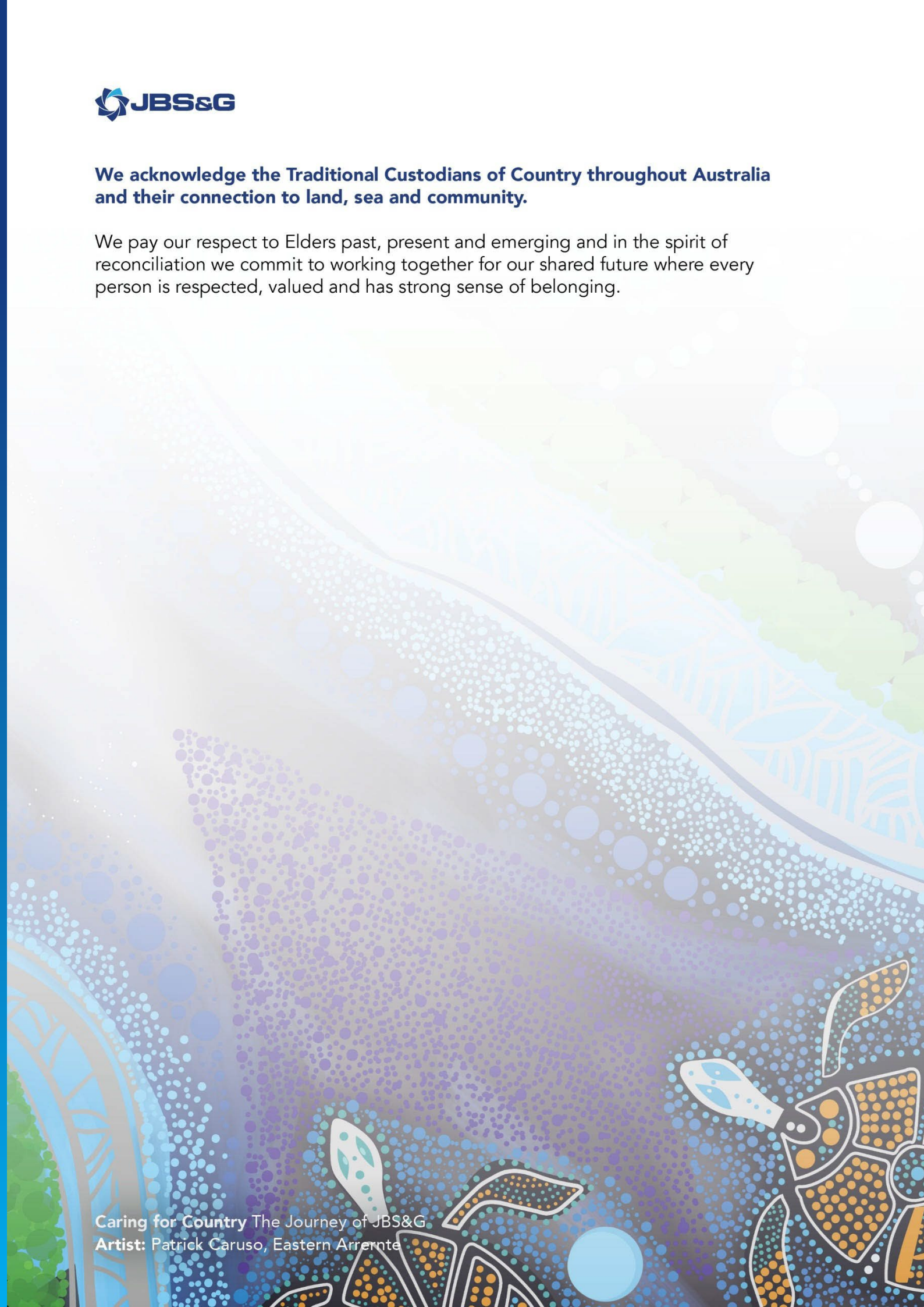




We acknowledge the Traditional Custodians of Country throughout Australia and their connection to land, sea and community.

We pay our respect to Elders past, present and emerging and in the spirit of reconciliation we commit to working together for our shared future where every person is respected, valued and has strong sense of belonging.

Caring for Country The Journey of JBS&G
Artist: Patrick Caruso, Eastern Arrernte



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) Jordan Williams

Position (please print) Project Director

Organisation (please print including ABN/CAN, if applicable) _____

Peet Mandurah Syndicate Limited. ABN 42 062 315 673

Date 04 / 05 / 2026

Table of Contents

1. Introduction	3
1.1 Project Background	3
1.2 Environmental Approval to Implement the Project	3
2. Current Status	3
3. Audit Methodology	4
3.1 Purpose and scope	4
3.2 Audit period	4
3.3 3.3 Methodology	4
3.4 Audit terminology	4
4. Audit Results	5
4.1 Compliance with EPBC conditions	5
4.2 Compliance with the Revegetation Management Plan	5
4.3 Corrective actions	5
5. New Environmental Risks	5
6. Limitations	11
7. References	12

List of Tables

Table 3.1: Persons Consulted	4
Table 3.2: Action Implementation Status (DCCEEW 2023)	4
Table 5.1: EPBC 2013/7048 Audit Table	6
Table 7.1: Revegetation Management Plan (Revision 8) Audit Table	2

Appendices

Appendix A	EPBC Approval 2013/7048
Appendix B	Revegetation Management Plan Assessment
Appendix C	Evidence Register

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) located approximately 65 km south of Perth Central District, Western Australia. The project involves the development of approximately 500 residential lots, Public Open Space (POS) and a primary school on Lot 9099 Mandjoogordap Drive, Mandurah.

The project commenced on 3 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 Climate Change, Energy, the Environment and Water [DCCEEW]) 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 2025 to 2 February 2026) included:

- Clearing activities in Stage 71, 75 and 79;
- Bulk earthworks in Stage 80;
- Weed spraying in the revegetation and landscaping areas; and
- Three yearly monitoring of revegetation areas undertaken in September 2025.

3. Audit Methodology

3.1 Purpose and scope

This report has been prepared for Peet (the approval holder) to fulfil the requirements of Condition 8 of EPBC 2013/7048 which states that:

‘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.’

3.2 Audit period

This Annual Compliance Report (ACR) addresses the audit period between 3 February 2025 and 2 February 2026 for the conditions of EPBC 2013/7048 and implementation of the Revegetation Management Plan (RMP) (Strategen, 2020 [Revision 8]) required by conditions 3 and 4 of EPBC 2013/7048.

3.3 Methodology

This audit was undertaken by Brenton Hills and involved a desktop audit, the findings of which were used to prepare this ACR (2026). Key persons consulted during the audit are listed in Table 3.1.

Table 3.1: Persons Consulted

Person and Position	Organisation	Purpose
Kiara De Francesch	Peet	To obtain verifiable evidence to assist in determining compliance with EPBC 2013/7048.
Brenton Hills	JBS&G	

3.4 Audit terminology

The ‘Status’ field of the audit tables (refer to Table 5.1) describes the implementation of actions and compliance with the approval. In 2023, the DCCEEW issued the Annual Compliance Report Guidelines, Reporting under the *Environment Protection and Biodiversity Conservation Act 1999* (DCCEEW, 2023). Terminology from this guidance has been applied in the audit and is listed below in Table 3.2.

Table 3.2: Action Implementation Status (DCCEEW 2023)

Status	Description
Compliant	‘Compliance’ is achieved when 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	A designation of ‘non-compliant’ must be given where 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	A designation of ‘not applicable’ must be given where the requirements of a condition or elements of a condition fall outside of the scope of the current

Status	Description
	reporting period. For example, a condition that applies to an activity that has not yet commenced.

4. Audit Results

The results of the audit of EPBC 2013/7048 conditions are shown in Table 5.1. The results of the audit of compliance with the key actions contained within the RMP are outlined in Appendix B.

4.1 Compliance with EPBC conditions

The results of the audit of EPBC 2013/7048 are shown in Table 5.1. Of 29 sub-conditions of EPBC 2013/7048:

- 11 conditions were assessed to be 'Compliant', with three of those identified as 'Completed';
- 15 conditions were assessed to be 'Not applicable'; and
- Zero conditions were assessed to be 'Potentially Non-compliant'.

4.2 Compliance with the Revegetation Management Plan

The RMP has been implemented across the Project during the period (Appendix B). Of 67 key actions identified from the RMP:

- 40 commitments were assessed to be 'Compliant', with 6 of those identified as 'Complete;'
- 27 commitments were assessed to be 'Not applicable'; and
- Zero commitments was assessed to be 'Potentially Non-compliant'.

4.3 Corrective actions

Not applicable.

5. New Environmental Risks

No new environmental risks have become apparent during the reporting period. Ongoing monitoring has highlighted the utilisation of waterlog-resistant species in the waterlogged sections within the revegetation area.

Table 5.1: EPBC 2013/7048 Audit Table

Condition Number	Criteria	Timing	Verification Method	Evidence	Determination	Compliance Finding
EPBC Decision 2013/7048 Condition 1:		The approval holder must not clear any black cockatoo habitat trees outside of the project area				
Condition 1	Do not clear habitat trees outside the project area.	Overall	Nearmaps comparison	G01_Lakelands Nearmaps Comparison	Nearmaps comparison 03 February 2025 to 04 April 2026 shows that no habitat trees were cleared outside the Project Area (G01)	Compliant
EPBC Decision 2013/7048 Condition 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.				
Condition 2	Retain 303 black cockatoo habitat trees and no less than 120 potential breeding trees and 183 foraging species within the project area.	Overall	Significant tree survey	E01_Tree count survey	Significant tree survey conducted in 2026 has identified that 141 potential breeding trees have been retained and 210 foraging species. Therefore, the number of trees retained currently meets the required criteria.	Compliant
EPBC Decision 2013/7048 Condition 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:				
		<ul style="list-style-type: none"> a. Objectives of the RMP; b. Location, condition, size and suitability of the revegetation areas within the offset site; c. Detailed information on each stage of the revegetation project; d. Black cockatoo tree and shrub species to be utilised, source of plant stock, stocking rates (at least six thousand two hundred (6200) tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species), planting method and schedule; e. Preventative management actions that will be implemented to manage weeds, feral animals and anthropogenic activities, within the offset site prior to, during and post planting; f. Revegetation success criteria (that 3 years from the date of planting the approval holder must achieve a minimum of 80 percent survival rate of the planted potential breeding species and 80 percent survival rate of the planted foraging species), and detailed response measures and corrective actions should success criteria not be met; g. Monitoring program, including the type, timing and frequency of monitoring; h. Responsibilities for planning, implementing, management, reporting and monitoring the RMP; i. Timeframes for the implementation of each stage of the RMP; j. Details on the conservation mechanism to protect and conserve the offset site. 				
Condition 3a	Prepare and submit a RMP for the Ministers approval.	Prior to commencement of the action	Submission correspondence	R02_2025 Lakelands ACR (Rev0) R03_Revegetation Management Plan (Rev 8)	As reported in the 2024 ACR (R02), this condition has previously been assessed as complete.	Complete
Condition 3b	The approval holder must not commence the action unless the Minister has approved the RMP.	Prior to commencement of the action	Ministers Approval	R02_2025 Lakelands ACR (Rev 0)	As reported in the 2024 ACR (R02), this condition has previously been assessed as complete.	Complete
Condition 3c	The RMP must contain the content listed as elements a to j.	Prior to commencement of the action	RMP Document	R03_Revegetation Management Plan (Rev 8)	The approved RMP Rev 8 includes the required details: <ul style="list-style-type: none"> a. Objectives of the RMP (Section 3.1) b. Location, condition, size and suitability of the revegetation areas within the offset site (Section 1.2) c. Detailed information on each stage of the revegetation project (Section 4) 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 	Compliant

Condition Number	Criteria	Timing	Verification Method	Evidence	Determination	Compliance Finding
					<p>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 (Sections 3.2, 4.3 and 4.6)</p> <p>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 (Section 4)</p> <p>f. The revegetation success criteria for achieving a minimum of 80 percent survival rate of the planted potential breeding species and 80 percent survival rate of the planted foraging species has been set at 10 years from first planting (Section 3.2) and not 3 years from the date of planting as required by this condition however the detailed response measures and corrective actions are based on 3 years from the date of planting (Section 6).</p> <p>g. Monitoring program, including the type, timing and frequency of monitoring (Section 5)</p> <p>h. Responsibilities for planning, implementing, management, reporting and monitoring the RMP (Section 4 and 7)</p> <p>i. Timeframes for the implementation of each stage of the RMP (Section 4.6)</p> <p>j. Details on the conservation mechanism to protect and conserve the offset site (Section 4.7)</p>	
EPBC Decision 2013/7048 Condition 4:		If the Minister approves the RMP, then the approval holder must implement the approved RMP.				
Condition 4	Implement the approved RMP	On approval of the RMP	Compliance audit	R01_2026 Lakelands ACR (Rev 0) Appendix B	<p>The RMP has been implemented during the period. Refer to Appendix B for assessment of implementation.</p> <p>Of 67 key actions identified from the RMP:</p> <ul style="list-style-type: none"> • 40 commitments were found to be 'Compliant', with six 'Complete' • 27 commitments were found to be 'Not Applicable' • Zero commitments were found to be 'Potentially Non-Compliant'. 	Compliant
EPBC Decision 2013/7048 Condition 5:		<p>To avoid and mitigate impacts to black cockatoos, if clearing is to be undertaken during the breeding season (July - November), within 7 days prior to clearing, the approval holder must ensure all potential nesting trees within the project area are investigated to detect the presence of black cockatoos using hollows. The investigation must be undertaken by a suitably qualified and experienced person.</p> <p>If any black cockatoos are detected using a hollow in a tree or trees, the approval holder must:</p> <ol style="list-style-type: none"> 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 of any vegetation within 10 metres of any such tree; and 				

Condition Number	Criteria	Timing	Verification Method	Evidence	Determination	Compliance Finding
		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 used by black cockatoos.			
Condition 5a	Investigate by a suitably qualified and experienced person potential nesting trees within the project area to detect for the presence of black cockatoos using hollows if clearing is to be undertaken in the breeding season (July to November).	Within 7 days prior to clearing	Inspection Report	M01_Evidence Request Response	No clearing was undertaken between July 2025 and November 2025.	Not Applicable
Condition 5b	If black cockatoos are detected during investigation, such trees shall be identified with fencing and signage within 2m of the base of the tree.	On detection	Inspection Report	Refer to EPBC 05a	Refer to EPBC 05a	Not Applicable
Condition 5c	If black cockatoos are detected during investigation, no clearing of the tree or vegetation within 10m of the tree shall be undertaken	On detection	Inspection Report	Refer to EPBC 05a	Refer to EPBC 05a	Not Applicable
Condition 5d	If black cockatoos are detected during investigation, the approval holder shall continue to ensure that the tree is not subject to clearing or damage until a suitably qualified and experienced person has verified in writing that the hollow/s in each such tree are no longer used by black cockatoos.	On detection	Inspection Report	Refer to EPBC 05a	Refer to EPBC 05a	Not Applicable
EPBC Decision 2013/7048 Condition 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.				
Condition 6	Notify the Department of the commencement date.	Within 30 days after the commencement of the action	Correspondence	R02_2024 Lakelands ACR (Rev 0)	As reported in the 2024 ACR (R02), this condition was completed in a previous reporting period. The action commenced 02/02/2015 and the Department was advised 13/02/2015.	Complete
EPBC Decision 2013/7048 Condition 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 <i>Environment Protection and Biodiversity Conservation Act 1999</i> 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.				
Condition 7a	Maintain accurate records substantiating all activities associated with conditions of approval and implementation of the RMP.	Overall	Electronic Records	R01_2026 Lakelands ACR (Rev 0) Appendix C	Appendix C of this document contains a register of the records substantiating compliance with the conditions of this approval and conformance with the RMP.	Compliant
Condition 7b	Make records available to the Department on request	On request by the Department	Submission of records correspondence to the Department	M01_Evidence Request Response	The Department did not make any requests for records in the reporting period.	Not Applicable
EPBC Decision 2013/7048 Condition 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.				
Condition 8a	Publish a report which assesses compliance with each condition of EPBC 2013/7048 approval including implementation of the RMP for each period 03 February to 02 February.	02 May annually	Report published on website	R02_2025 Lakelands ACR (Rev 0) E02_Website Screenshot RMP 30-05-2026	The 2025 ACR was published on Peet's website on 2/05/2025.	Compliant
Condition 8b	Provide evidence to the Department of report publishment as per EPBC08A	02 May annually	Email submission to the Department	E03_Submission Email	Peet provided evidence of the published 2025 ACR by email on 2/05/2025	Compliant
Condition 8c	Compliance reports must remain published on the website for the life of the approval.	Overall	Report published on website	E04_Website Screenshot 30-05-2026	Historic compliance reports remain on Peet's website.	Compliant

Condition Number	Criteria	Timing	Verification Method	Evidence	Determination	Compliance Finding
Condition 8d	All contraventions must also be included in the compliance reports.	Overall	Report published on website	R02_2025 Lakelands ACR (Rev 0)	The 2025 ACR included one Potential Non-Compliance (RMP 38).	Compliant
Condition 8e	Provide a copy of any compliance report to members of the public on request	Within 7 days of a request	Correspondence records	M01_Evidence Request Response	No requests for historic compliance reports from the public were made during the reporting period.	Not Applicable
EPBC Decision 2013/7048 Condition 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.				
Condition 9	Report potential or actual contraventions of the conditions of the approval	Within 2 business days of the approval holder becoming aware of the actual or potential contravention	Notification correspondence	R01_2026 Lakelands ACR (Rev 0) Appendix C	The Potential Non-Compliances assessed in the 2026 ACR (R01) were identified on 4/05/2026 and will be provided to the Department by 06/05/2026.	Compliant
EPBC Decision 2013/7048 Condition 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.				
Condition 10a	Where directed to undertake an independent audit by the Minister, the approval holder must submit the audit criteria and proposed auditor for approval by the Minister before the audit is to commence	Prior to the commencement of the audit.	Submission correspondence Audit Criteria Acceptance	M01_Evidence Request Response	Management advised they had not received direction from the Minister to conduct an independent audit during the audit period.	Not Applicable
Condition 10b	Where directed to undertake an independent audit by the Minister, the approval holder must provide the independent audit report to the Minister	Once the auditor and audit criteria have been approved	Independent Audit Report Submission	Refer to EPBC 10a	Refer to EPBC 10a	Not Applicable
EPBC Decision 2013/7048 Condition 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: <ul style="list-style-type: none"> 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. 				
Condition 11a	The approval holder may choose to revise the RMP without submitting for approval if taking the action would not be likely to have a new or increased impact. The approval holder must: <ul style="list-style-type: none"> • Notify the Department and provide an electronic copy of the RMP • Implement the RMP from the date the plan is submitted to the Department • Maintain a record of the reasons that taking the action in accordance with the revised RMP would not be likely to have a new or increased impact 	At any time	Notification from the approval holder	M01_Evidence Request Response	The approval holder did not choose to revise the RMP in the reporting period.	Not Applicable
Condition 11b	The approval holder can give notice to revoke its choice to implement a revised RMP as per EPBC 11a and implement the RMP approved by the Minister.	At any time	Notification from the approval holder	Refer to EPBC 11a	Refer to EPBC 11a	Not Applicable
Condition 11c	If the Minister gives notice that a RMP provided under 11a would be likely to have a new or increased impact, then the approval holder must implement the RMP approved by the Minister.	At any time	Notification from the approval holder	Refer to EPBC 11a	Refer to EPBC 11a	Not Applicable

Condition Number	Criteria	Timing	Verification Method	Evidence	Determination	Compliance Finding
Condition 11d	The approval holder can submit a revised RMP under section 143A of the EPBC Act	At any time	Submission correspondence	M01_Evidence Request Response	The approval holder did not submit a revised RMP in the reporting period.	Not Applicable
EPBC Decision 2013/7048 Condition 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.				
Condition 12a	Make the specified revisions requested by the Minister.	At any time	Revised RMP	M01_Evidence Request Response	Management advised that no requests were received from the Minister during the audit period to revise the RMP.	Not Applicable
Condition 12b	Implement the revised RMP.	Ongoing	Compliance audit	Refer to EPBC 12A	Refer to EPBC 12A	Not Applicable
EPBC Decision 2013/7048 Condition 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.				
Condition 13a	Publish the RMP on the approval holder website.	For the life of the approval	Plan on website	E02_Website Screenshot	Revision 8 of the RMP (R02) was accessed online by the auditor on 21/04/2025: https://www.peet.com.au/western-australia/lakelands/wp-content/uploads/sites/80/2025/05/R01-Lakelands-ACR-2025-Rev-0.pdf	Compliant
Condition 13b	Publish the revised RMP on the approval holder website.	Within 1 month of being approved or submitted under condition 11i	Plan on website	M01_Evidence Request Response	The RMP was not revised in the reporting period	Not Applicable

6. Limitations

Scope of services

This report (“the report”) has been prepared by JBS&G in accordance with the scope of services set out in the contract, or as otherwise agreed, between the Client and 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, 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, 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. JBS&G has also not attempted to determine whether any material matter has been omitted from the data. 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 JBS&G. The making of any assumption does not imply that 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. 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 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, including to any third parties, and no liability will be accepted for use or interpretation of this report by any third party.

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.

JBS&G accepts no liability for use or interpretation by any person or body other than the client who commissioned the works. This report should not be reproduced without prior approval by the client, or amended in any way without prior approval by JBS&G or reproduced other than in full, including all attachments as originally provided to the client by JBS&G.

7. References

DCCEEW, 2023. *Annual Compliance Report Guidelines, Reporting under the Environment Protection and Biodiversity Conservation Act 1999*, Canberra, ACT: Commonwealth of Australia.

Strategen-JBS&G, 2020. *Revegetation Management Plan [Revision 8]*, Perth, WA: Prepared for Peet Limited.

Appendix A EPBC Approval 2013/7048



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.

Appendix B Revegetation Management Plan Assessment

Table 7.1: Revegetation Management Plan (Revision 8) Audit Table

Condition Number	Condition	Timing	Evidence	Comments	Compliance
Section 3.1 Revegetation objectives and scope					
RMP 01	Revegetation will occur within two specified areas (revegetation areas and landscaping areas in the offset site) as displayed in Figure 1.	During revegetation	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Revegetation occurred within the revegetation area during winter 2025.	Compliant
RMP 02	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	R02_2025 Lakelands ACR (Rev0)	The requirement to plant 6200 tree or shrub plants, including no less than 3000 plants that are potential breeding habitat and no less than 3200 plants that are foraging species was achieved in 2016.	Complete

Table 2: Completion criteria and indicators for revegetation objectives for the revegetation

RMP 03	<p>Objective: Creation and enhancement of Carnaby’s Cockatoo and Forest Red-tailed Black Cockatoo habitat. Implement weed management protocols.</p> <p>Completion criteria:</p> <ul style="list-style-type: none"> No greater than 10% weed cover. No Declared Plants or weeds of national environmental significance. <p>Indicator: Revegetation monitoring results</p>	At completion	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Completion criteria to be assessed at completion (winter 2026)	Not Applicable
RMP 04	<p>Objective: Creation and enhancement of Carnaby’s Cockatoo and Forest Red-tailed Black Cockatoo habitat. Ensure animals are not grazing on planted seedlings.</p> <p>Completion criteria: Implement contingency measures as outlined in section 6 if grazing is observed on planted seedlings.</p> <p>Indicator: Site inspection and revegetation monitoring results</p>	At completion	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Completion criteria to be assessed at completion (winter 2026)	Not Applicable
RMP 05	<p>Objective: Ensure that there is a minimum of 80 percent survival of planted breeding species and 80 percent survival of planted foragingspecies ten years from the date of initial planting completion. Promote vegetation growth within degraded areas.</p> <p>Completion criteria: 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> <p>Indicator: Revegetation monitoring results</p>	At completion	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Completion criteria to be assessed at completion (winter 2026)	Not Applicable

Condition Number	Condition	Timing	Evidence	Comments	Compliance
RMP 06	<p>Objective: Ensure that there is a minimum of 80 percent survival of planted breeding species and 80 percent survival of planted foraging species ten years from the date of initial planting completion. Promote vegetation growth within degraded areas.</p> <p>Completion criteria: Ensure management actions as detailed in section 4 are complied with.</p> <p>Indicator: Site inspection, revegetation planting lists and invoices and 3 yearly revegetation monitoring results.</p>	Refer to items RMP 10-16 and 18-24	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Completion criteria to be assessed at completion (winter 2026)	Not Applicable
RMP 07	<p>Objective: Rehabilitate the site with known breeding species and foraging species for the Carnaby's Black-Cockatoo, Baudin's Black Cockatoo and Forest Red-tailed Black-Cockatoo and promote vegetation growth and enhance vegetation health within degraded areas. Establish revegetation which focuses on foraging, roosting and breeding species for black cockatoo species as identified by DEC (2011).</p> <p>Completion criteria: 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> <p>Indicator: Site inspection and revegetation planting lists and invoices</p>	At completion	Refer to RMP 02	Refer to RMP 02	Complete
RMP 08	<p>Objective: Rehabilitate the site with known breeding species and foraging species for the Carnaby's Black-Cockatoo, Baudin's Black Cockatoo and Forest Red-tailed Black-Cockatoo and promote vegetation growth and enhance vegetation health within degraded areas. Establish revegetation which focuses on foraging, roosting and breeding species for black cockatoo species as identified by DEC (2011).</p> <p>Completion criteria: 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> <p>Indicator: Revegetation monitoring results</p>	At completion	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Completion criteria to be assessed at completion (winter 2026).	Not Applicable
Section 4.1.1 Revegetation areas					
RMP 09	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	E05_2024 09 073 Seed Collection Black Swan Swamp Lakelands E06_2024 09 074 Planting Black Swan Swamp Lakelands	Seeds were collected in 2024 and used in revegetation activities in winter 2025.	Compliant
Table 3: Management actions (revegetation areas)					
RMP 10	1. Undertake a site inspection to identify the weed species, locations and abundance within revegetation areas to provide data to inform weed management.	Prior to revegetation activities taking place	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	The annual revegetation monitoring survey undertaken on 16/07/2025 (R03) identified weed species, locations and abundance within the revegetation areas	Compliant
RMP 11	2. 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 to maximise potential for revegetation success	Prior to seedling planting taking place in accordance with chemical specifications	E07_BSL Weed Control Feb 2025 E08_BSL Weed Control Jun 2025	Weed control was undertaken in February and June 2025, prior to the revegetation activities.	Compliant
RMP 12	3. Undertake ongoing maintenance weed control as described in section 4.2 to maximise potential for revegetation success.	Biannual for three years from the initial planting completion date.	E07_BSL Weed Control Feb 2025 E08_BSL Weed Control Jun 2025	Weed control was undertaken in February and June 2025.	Compliant

Condition Number	Condition	Timing	Evidence	Comments	Compliance
		Should infill planting be required maintenance weed control would be applied biannually for three years from infill planting completion date			
RMP 13	4. Undertake seedling planting as described in Section 4.3 to maximise potential for revegetation success.	After the completion of initial weed control	M02_Infill planting 2025	Seedling planting was undertaken in winter 2025, in accordance with the RMP.	Compliant
RMP 14	5. 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 to minimise impact from animal activities.	After seedling planting	M02_Infill planting 2025	Tree guards were installed during revegetation activities	Compliant
RMP 15	6. Ensure all plants and other materials used in revegetation are free of dieback and weeds to ensure dieback and weeds are not introduced or spread during revegetation.	Prior to revegetation activities taking place	M02_Infill planting 2025	The revegetation area was free of dieback and weeds during revegetation, dieback and weed measures were undertaken during revegetation.	Compliant
RMP 16	7. Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering revegetation areas to ensure dieback and weeds are not introduced or spread during revegetation.	At all times	M02_Infill planting 2025	Dieback and weed measures were undertaken during revegetation.	Compliant
Section 4.1.2 Landscaping area					
RMP 17	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.	Not applicable	There were no seedling propagated for the revegetation in the landscaping area in the reporting period.	Not Applicable
Table 4: Management actions (landscaping areas in the offset site)					
RMP 18	1. Undertake a site inspection to identify the weed species, locations and abundance within the landscaping areas to provide data to inform weed management.	Prior to revegetation activities taking place.	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	The annual revegetation monitoring survey undertaken on 16/07/2025 (R03) identified weed species, locations and abundance within the landscaping areas.	Compliant
RMP 19	2. 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 to maximise potential for revegetation success.	Prior to seedling planting taking place in accordance with chemical specifications.	Not Applicable	No seedling planting was undertaken in the landscaping areas in the reporting period.	Not Applicable
RMP 20	3. Undertake ongoing maintenance weed control as described in section 4.2 to maximise potential for rehabilitation success.	Biannually (as necessary) until responsibility of managing the revegetation site is transferred to City of Mandurah.	E07_BSL Weed Control Feb 2025 E08_BSL Weed Control Jun 2025	Weed control was undertaken in February and June 2025	Compliant
RMP 21	4. Undertake seedling planting as described in Section 4.3 to maximise potential for rehabilitation success.	After the completion of initial weed control.	Not Applicable	No seedling planting was undertaken in the landscaping areas in the reporting period.	Not Applicable
RMP 22	5. 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 to minimise impact from animal activities.	After seedling planting.	Refer to RMP 21	Refer to RMP 21	Not Applicable
RMP 23	6. Ensure all plants and other materials used in revegetation are free of dieback and weeds to ensure dieback and weeds are not introduced or spread during revegetation.	Prior to revegetation activities taking place.	Refer to RMP 21	Refer to RMP 21	Not Applicable

Condition Number	Condition	Timing	Evidence	Comments	Compliance
RMP 24	7. Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering landscaping areas to ensure dieback and weeds are not introduced or spread during revegetation.	At all times.	Refer to RMP 21	Refer to RMP 21	Not Applicable
Section 4.2					
RMP 25	Weed control techniques will comprise of chemical controls identified in Table 5 Table 5: <ul style="list-style-type: none"> Initial broad scale spray herbicide application (using towed boom spray rigs) Spot spray herbicide application Stem injection, cut and paint. 	At all times.	E07_BSL Weed Control Feb 2025 E08_BSL Weed Control Jun 2025	Workpower undertook weed control in the revegetation and landscaped areas in February and June 2025 (E04, E05) via twin spray unit, backpack spray pack and hand pulling weeds. The chemical applicable records document chemical concentrations and application rate.	Compliant
RMP 26	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.	E08_BSL Weed Control Jun 2025	Weed control was undertaken in June 2025.	Compliant
RMP 27	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.	M02_Infill planting 2025	See RMP 26.	Not Applicable
RMP 28	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.	M01_Evidence Request Response	Management of the site was under Peet's management during the reporting period.	Compliant
Section 4.3 Seedling Planting					
RMP 29	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 09	Refer to RMP 09	Refer to RMP 09	Compliant
RMP 30	Only species defined within EPBC 2013/7048 as potential breeding or foraging species for black cockatoos (Tuart, Marri, Jarrah, Acacia saligna, Banksia attenuata, Banksia grandis, Banksia menziesii and Allocasuarina fraseriana species) will be considered as part of the 6200 plants that are required to be planted.	At all times.	Refer to RMP 02	Refer to RMP 02	Complete
RMP 31	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.	Refer to RMP 09	Refer to RMP 09	Compliant
RMP 32	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.	M02_Infill planting 2025	No initial site works were completed (not including weed control). Revegetation activities included seedling planting.	Compliant
RMP 33	Seedling planting will be undertaken in early winter, within one month of the first rains.	Early winter, within one month of the first rains.	M02_Infill planting 2025	See RMP 38	Not Applicable
RMP 34	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	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	The overall target stocking rates have been met in 2025.	Compliant
RMP 35	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.	M02_Infill planting 2025 E05_2024 09 073 Seed Collection Black Swan Swamp Lakelands E06_2024 09 074 Planting Black Swan Swamp Lakelands	Tubestock was installed during the Winter 2025 revegetation event.	Compliant

Condition Number	Condition	Timing	Evidence	Comments	Compliance
RMP 36	<p>Tubestock should also not be root bound, and planting should be undertaken as follows:</p> <ul style="list-style-type: none"> Optimal location of each species at the site should be chosen at the time of planting to ensure appropriate condition for each species (e.g., topography, shade/sun, soil moisture etc) Seedling should be planted so that the stem is vertical, and the base of the plant is slightly below the original soil surface Soil surrounding the seedling root ball should be pressed in firmly to avoid air pockets a minimum of three stakes and a protective guard manufactured for such purpose should be placed around the seedling to protect the vegetation from grazing and wind damage. 	During revegetation.	M02_Infill planting 2025	Revegetation activities were undertaken in accordance with the RMP.	Compliant
RMP 37	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 56.	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Plant stress due to lack of water was not observed during the 2025.	Not Applicable
RMP 38	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 53.	M02_Infill planting 2025	Three-yearly monitoring occurred in the current reporting (R04) period in accordance with RMP43. Infill planting is scheduled to occur after the first Winter rains in 2026	Not Applicable
Section 4.4 Grazing Control					
RMP 39	Tree guards are to be installed around planted seedlings which will provide protection from browsing animals.	Refer to item 35	M02_Infill planting 2025	Tree guards were installed around planted seedlings during the revegetation in winter 2025.	Compliant
Section 4.5 Hygiene Measures					
RMP 40	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.	E06_2024 09 074 Planting Black Swan Swamp Lakelands	Seeds were collected late 2024 and were propagated in the NIASA accredited Natural Area nursery during 2025.	Compliant
RMP 41	Vehicles, machinery, equipment and footwear will also be free of mud and soil when entering the offset site.	During revegetation	M02_Infill planting 2025	Dieback and weed measures were undertaken during the revegetation event in winter 2025.	Compliant
Section 4.7 Conservation Mechanism					
RMP 42	<p>A conservation covenant under one of the following legislative mechanisms will be applied over the offset site by 30 June 2019:</p> <ul style="list-style-type: none"> Transfer of Land Act 1893 Soil and Land Conservation Act 1945 National Trust of Australia (WA) Act 1964. 	By 30 June 2020.	R02_2025 Lakelands ACR (Rev 0) E09_Certificate of Title LR3171-501 164 Lake Valley Drive, Lakelands 6180	As reported in the 2024 ACR (R02), this commitment was complete in a previous audit period. The offset site is a reserve with a restrictive covenant to the City of Mandurah (E09).	Complete
Section 5.1.1 Monitoring Methodology – Revegetation Areas					
RMP 43	Monitoring plots will be established within revegetation areas to enable monitoring data to be collected. Six 10 m by 10 m monitoring plots will be set up within revegetation areas taking into consideration species type, topography etc.	Every three years.	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	<p>The annual revegetation monitoring survey undertaken on 21/10/2025 monitored seven permanent 10 m by 10 m monitoring plots within the revegetation area and one permanent 10 m by 10 m monitoring plots within the landscaping area.</p> <p>It is noted that revegetation monitoring is being undertaken annually, which is more frequent than required by the RMP (every 3 years).</p>	Compliant
RMP 44	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).	Every three years	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Correspondence from the revegetation monitoring consultant advised that this monitoring method is useful as a “subsampling” method for rehabilitation sites with very	Not Applicable

Condition Number	Condition	Timing	Evidence	Comments	Compliance
				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.	
RMP 45	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: <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	Every three years.	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	The annual revegetation monitoring survey/report undertaken on 21/10/2025 and data was collected on the required parameters. Data collected from each quadrant included: <ul style="list-style-type: none"> Species richness Plant density Numbers of trees were recorded from the entire 10 m by 10 m monitoring plot to obtain an appropriate representative sample	Compliant
RMP 46	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)	Every three years.	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	The annual revegetation monitoring survey was undertaken on 21/10/2025 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).	Compliant
Section 5.1.1 Monitoring Methodology – Landscaping Areas					
RMP 47	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: <ul style="list-style-type: none"> Plant stress Plant mortality Weed species. 	Every three years.	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Observations in landscaping areas were undertaken on 21/10/2025 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.	Compliant
Table 9 Monitoring program for revegetation and landscaping areas within the offset site					
RMP 48	Opportunistic observation during monitoring: <ol style="list-style-type: none"> Plant health (i.e., evidence of water stress, pests, animal grazing) 	Every three years.	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Annual monitoring for the revegetation and landscaping areas was undertaken on 21/10/2025 and included observations on plant health (e.g., plant stress, mortality and grazing) in both areas	Compliant
RMP 49	Monitoring of quadrats. <ol style="list-style-type: none"> Plant density Species richness Plant health (i.e., evidence of water stress, pests, animal grazing) 	Every three years.	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Monitoring of seven permanent monitoring plots established within the revegetation area and one permanent monitoring plot established within the landscaping area were assessed on 21/10/2025 and included species composition of planted flora, abundance of each planted flora species and native plant health.	Compliant
RMP 50	Observation during monitoring. <ol style="list-style-type: none"> Weed species. <ul style="list-style-type: none"> To monitor weed occurrence within revegetation and landscaping areas To monitor weed growth in revegetation and landscaping areas and compare to completion criteria. 	Annually until handover to the CoM	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Annual monitoring of weed species in the revegetation and landscaping areas was undertaken on 21/10/2025. Weed occurrence was monitored within the revegetation and landscaping areas.	Compliant
Section 6 Contingency Measures					

Condition Number	Condition	Timing	Evidence	Comments	Compliance
RMP 51	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.	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Contingency actions have been initiated: • Weed control is being undertaken to address unsuccessful achievement of 10% weed cover completion criteria.	Compliant
RMP 52	Where contingency actions are required to be implemented, they will be reported to DoE as part of the EPBC Act annual environmental reporting requirements, as detailed in Section 8	As required	R02_2025 Lakelands ACR	This audit table forms part of the EPBC 2013/7048 Annual Audit Compliance Report, and the contingency actions implemented and reported below form part of this report.	Compliant
RMP 53	1. 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. <ul style="list-style-type: none"> Identify cause. 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. Monitor success of contingency measure(s) 	On trigger	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Foraging species target density was met in 2025, however breeding species density was disturbed by waterlogging. To improve future breeding species density, it was recommended that waterlog-resistant species are used in waterlog-prone areas.	Compliant
RMP 54	2. If approximately 20% of seedlings planted show evidence of damage by animal (i.e., grazing). <ul style="list-style-type: none"> 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 Providing alternate species suitable to the site and provenance requirements. Monitor success of contingency measure(s). 	On trigger	Refer to RMP 04	Refer to RMP 04	Not Applicable
RMP 55	2. If approximately 20% of seedlings planted show evidence of damage by pests. <ul style="list-style-type: none"> 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 	On trigger	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Section 3.1.2 of the 2024 monitoring (R06) undertaken 21/10/2025 reports no significant evidence of insect pests.	Not Applicable

Condition Number	Condition	Timing	Evidence	Comments	Compliance
	<ul style="list-style-type: none"> Providing alternate species suitable to the site and provenance requirements. Monitor success of contingency measure(s). 				
RMP 56	<p>2. If approximately 20% of seedlings planted show evidence of water stress.</p> <ul 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). 	On trigger	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	Section 3.1.2 of the 2025 monitoring (R06) undertaken 21/10/2025 does not report any seedlings showing evidence of (inadequate) water stress. However, it does report on a Marri Sapling showing (water logging) water stress and recommends infill planting of species that are not sensitive to water logging including avoiding <i>Hakea prostrata</i> , <i>Jacksonia furcellata</i> and <i>Eucalyptus gomphocephala</i>	Compliant
RMP 57	<p>3. If there is greater than 10% weed cover or it is determined that there is Declared Plants or weeds of national environmental significance:</p> <ul 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). 	On trigger	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	<p>During the 2025 monitoring found weed cover (%) at monitoring quadrats to be:</p> <ul style="list-style-type: none"> Quadrat 1: 13.25% Quadrat 2: 40.40% Quadrat 3: 14.95% Quadrat 4: 9.60% Quadrat 5: 7.30% Quadrat 6: NA Quadrat 7: 105.10% Quadrat 8: 2.25% <p>Weed spraying was undertaken February and June 2025. This program will continue in 2026. Success of the contingency measures will be monitored during the 2026 revegetation monitoring survey.</p>	Compliant
RMP 58	<p>4. If there is unauthorised access (people and vehicles).</p> <ul 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). 	On trigger	M01_Evidence Request Response	No unauthorised access evident. Only evidence of access is by maintenance through secure bollard system.	Not Applicable
RMP 59	<p>5. If Tubestock grown from seed collected within 50km of the revegetation site is not available for infill planting</p> <ul style="list-style-type: none"> Source Tubestock grown from seed collected from the Swan Coastal Plain Monitor success of infill planting as per Section 5. 	On trigger	<p>E05_2024 09 073 Seed Collection Black Swan Swamp Lakelands</p> <p>E06_2024 09 074 Planting Black Swan Swamp Lakelands</p>	Seed for propagating tube stock was collected late 2024 within 50km of Black Swan Lake (E09, E10)	Not Applicable
Section 7 Plan Implementation					
RMP 60	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.	M01_Evidence Request Response	Peet maintained responsibility of the implementation of the RMP through the reporting period. The revegetation site has not been transferred to the City of Mandurah.	Compliant
RMP 61	The revegetation site will be vested as Crown Reserve designated as Public Open Space (POS), with management vested to the City of	At handover	E09_Certificate of Title LR3171-501 164 Lake Valley Drive, Lakelands 6180	The revegetation site on Lot 8019 Deposited Plan 416954 is Reserve 53656 for the purpose of conservation and passive	Complete

Condition Number	Condition	Timing	Evidence	Comments	Compliance
	Mandurah under Section 152 of the Planning and Development Act 2005.			recreation with a restrictive covenant registered to the City of Mandurah 11/03/2020 recorded on the certificate of title under the Land Administration Act 1997.	
RMP 62	All contractors and staff will be required to operate in accordance with this RMP.	At all times	M02_Infill planting 2025	Personnel are undertaking the tasks and requirements of the RMP in accordance with the RMP.	Compliant
Section 8 Audit, Review and Reporting					
RMP 63	Peet will maintain accurate records of all rehabilitation activities undertaken for the duration of the revegetation program until transfer of management to the CoM.	Overall	R01_2026 Lakelands ACR Appendix C	Appendix C of the ACR contains an evidence register containing accurate records relevant to the implementation of the RMP, including the rehabilitation program	Compliant
RMP 64	Records of all rehabilitation activities will be made available to DEE upon request.	On request	M01_Evidence Request Response	There has been no request from DCCEEW for records relating to the implementation of the RMP (including rehabilitation activities) in the reporting period	Not Applicable
RMP 65	Within three months of every 12-month anniversary of the commencement of the action, Peet will also publish a report on their website, addressing compliance with each condition of approval for Lakeland East (EPBC 2013/7048).	By 03 May annually	E03_Submission Email	The 2025 ACR (R02) was posted on the Peet website 02/05/2025 within three months of the 12-month anniversary of the commencement of the action (03/02/2015) as per the notification to DCCEEW 02/05/2025 (E03)	Compliant
RMP 66	The compliance report will include compliance with condition 2 which requires the preparation of this RMP.	By 03 May annually	R02_2025 Lakelands ACR (Rev 0)	The 2025 ACR (R02) determines that the RMP has been prepared, contains the elements required under Condition 3, and the RMP was approved prior to commencement of the action	Complete
RMP 67	Peet will advise DEE of the publication of the compliance report.	By 03 May annually	E03_Submission Email	Peet advised DCCEEW 02/05/2025 (E03) of the publication of the 2025 ACR (R02).	Compliant

Appendix C Evidence Register

Code	Reference	Author	Electronic	Hard Copy	Evidence Description
E01	E01_Tree count survey		X		Viridis Environmental's email of 2026 tree count survey data of the Project Area.
E02	E02_Website Screenshot RMP 30-05-2026	JBS&G	X		Website screenshot taken 4/05/2026 of Peet Lakelands website where Revision 8 of the RMP (R03) is accessible: https://www.peet.com.au/communities/perth-andwa/lakelands-estate/purchaser_builderinformation/environmental-sustainability
E03	E03_Submission Email		X		Email submission 02/05/2025 to DCCEEW of Lakelands 2025 ACR (R02) with website link and screenshot.
E04	E04_Website Screenshot 30-05-2026	JBS&G	X		Website screenshot taken 04/05/2026 of Peet Lakelands website where ACRs 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025 (R02) are accessible: https://www.peet.com.au/communities/perth-andwa/lakelands-estate/purchaser_builderinformation/environmental-sustainability
E05	E05_2024 09 073 Seed Collection Black Swan Swamp Lakelands		X		Quotation for Seed Collection [2024 09 073 V2] 12/09/2024 to JBS&G from Natural Area Consulting Management Services for Seed Collection for Black Swan Swamp, Lakelands
E06	E06_2024 09 074 Planting Black Swan Swamp Lakelands		X		Quotation for Plant Supply and Install, Black Swan Swamp, Lakelands [2024 09 074 V2] 12/09/2024 to JBS&G from Natural Area Consulting Management Services for the provision of the supply and installation of approximately 1,300 native Tubestock across the 10.8 ha Black Swan Swamp revegetation site.

Code	Reference	Author	Electronic	Hard Copy	Evidence Description
E07	E07_BSL Weed Control Feb 2025		X		Workpower records from weed control event February 2025: <ul style="list-style-type: none"> • Pre-start hygiene inspection check signoff • Weed control map • Chemical application record
E08	E08_BSL Weed Control Jun 2025		X		Workpower records from weed control event June 2025 <ul style="list-style-type: none"> • Pre-start hygiene inspection check signoff • Weed control map • Chemical application record
E09	E09_Certificate of Title LR3171-501 164 Lake Valley Drive, Lakelands 6180		X		Certificate of Title for Lot 8019 on Deposited Plan 416954 (Reserve under Management Order City of Mandurah).
G01	G01_Lakelands Nearmaps Comparison	JBS&G	X		Nearmaps image comparison between 03/02/2025 and 04/04/2026 showing no evidence of clearing outside of the Development Envelope.
M01	M01_Evidence Request Response	JBS&G	X		Response to JBS&G request for evidence to undertake annual compliance assessment of EPBC 22013/7048.
M02	M02_Infill planting 2025		X		Natural Areas records from the revegetation activities in winter 2025
R01	R01_2026 Lakelands ACR (Rev0)	JBS&G	X		This Annual Compliance Report
R02	R02_2025 Lakelands ACR (Rev0)	JBS&G	X		Peet Mandurah Syndicate Limited Lakelands East Residential Development, Mandurah, WA (EPBC 2013/7048) JBS&G 2025 Annual Compliance Report [67199 Rev 0] 2/05/2025
R03	R03_Revegetation Management Plan (Rev 8)	JBS&G	X		Peet Limited Lakelands East: Lot 9099 Mandjoogoordap Drive, Mandurah Black Swan Swamp Revegetation Management Plan [56778 Rev 8] 28 July 2020
R04	R04_68696_R01_Lakelands_Reveg_Monitoring_2025_RevA	JBS&G	X		Lakelands East - Black Swan Swamp Annual revegetation monitoring, spring 2025 [68696 Rev A] 29 October 2025

© JBS&G

This document is and shall remain the property of JBS&G. The document may only be used for the purposes for which it was commissioned and in accordance with the Terms of Engagement for the commission. Unauthorised use of this document in any form whatsoever is prohibited

Document Distribution

Rev No.	Copies	Recipient	Date
0	1x Electronic	Kiara De Francesch	30/04/2026

Document Status

Rev No.	Author	Reviewer Name	Approved for Issue Name	Signature	Date
0	B Hills	A Winzer	A Winzer		30/04/2026



Adelaide

Kaurna Country | 100 Hutt Street,
Adelaide, SA 5000
T: 08 8431 7113

Brisbane

Turrbal/Yuggera Country | Level 37,
123 Eagle Street, Brisbane, QLD 4000
T: 07 3211 5350

Bunbury

Wardandi Country | 177 Spencer Street,
Bunbury, WA 6230
T: 08 9792 4797

Byron Bay

Bundjalung Country | Unit 3C,
18 Centennial Circuit, Byron Bay NSW 2481
T: 07 3211 5350

Gold Coast

Yugambah Country | Level 2,
14 Edgewater Court, Robina, QLD 4226
T: 07 3211 5350

Hobart

Muwinina Country | Level 2,
137 Liverpool Street, Hobart, TAS 7000
T: 03 6208 3700

Melbourne

Wurundjeri Country | Level 19,
31 Queen Street, Melbourne, VIC 3000
T: 03 9642 0599

Perth

Whadjuk Country | Allendale Square,
Level 9, 77 St Georges Terrace, WA 6000
T: 08 9380 3100

Sydney

Gadigal Country | Level 8,
179 Elizabeth Street, Sydney, NSW 2000
T: 02 8245 0300

Wollongong

Dharawal Country | Suite 406, Level 4,
43 Burelli Street, Wollongong, NSW 2500
T: 02 4225 2647