

Richard Noble  
Annual Compliance Report

Lots 13, 14 and 18 Barfield Rd and Lots 48-51 Rowley  
Rd, Hammond Park (EPBC 2012/6524)

27 July 2021

59901 (Rev 0)

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

## Table of Contents

Declaration of accuracy .....	iii
1. Introduction .....	1
1.1 Project background .....	1
1.2 Environmental approval to implement the Project .....	1
2. Current status .....	3
3. Audit methodology .....	6
3.1 Audit plan .....	6
3.1.1 Purpose and scope .....	6
3.1.2 Methodology .....	6
3.2 Audit terminology .....	7
4. Audit results .....	8
4.1 Compliance with conditions of EPBC 2012/6524 .....	8
4.2 Compliance with RMP .....	8
4.3 Compliance with RMP completion criteria .....	8
5. References .....	12
6. Limitations .....	13

## List of Tables

Table 3.1: Persons consulted during audit .....	6
Table 3.2: Action implementation status .....	7
Table 4.1: EPBC 2012/6524 audit table .....	9

## Appendices

Appendix A Implementation of Rehabilitation Management Plan

## 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

A handwritten signature in black ink, appearing to read "Peter Dockett".

Full name (please print) Peter Dockett

Position (please print) Development Director

Organisation (please print including ABN/ACN if applicable) Gold Estates Holdings Pty Ltd ABN 40 097 065 944

Date 26/07/2021

## 1. Introduction

This report addresses the status and compliance of Gold Estates Holdings Pty Ltd (GEH), with the conditions in *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval 2012/6524 (EPBC 2012/6524) to clear native vegetation on Lots 13, 14, 18 Barfield Road and Lots 48-51 Rowley Road, Hammond Park, Western Australia (the action). This report has been prepared for the purpose of meeting the requirements of condition 7 of EPBC 2012/6524, which requires the proponent to verify compliance with the conditions of approval.

### 1.1 Project background

Richard Noble, on behalf of GEH, is developing the Vivente Residential Development (the Project), located within Lots 13, 14, 18 Barfield Road and Lots 48-51 Rowley Road, Hammond Park, Western Australia. The Project site covers approximately 33.5 ha, of which up to 22.92 ha of native vegetation is permitted to be cleared for firebreaks, residential lots, Public Open Space (POS) and other disturbances.

On-site and off-site rehabilitation will be undertaken to offset the impacts of the development on Carnaby's and Forest Red-tail black cockatoos (referred to collectively as 'black cockatoos' throughout the document). Off-site rehabilitation will take place at Bibra Lake Reserve, where 1.78 ha of degraded vegetation has been identified for rehabilitation. On-site bushland in good condition will be retained in POS and further rehabilitated. In addition, non-native tree species will be used in streetscaping (with the exception of *Corymbia ficifolia*), as required by the City of Cockburn, which will provide a foraging source for black cockatoos.

### 1.2 Environmental approval to implement the Project

The action was referred to the former federal Department of Sustainability, Environment, Water, Populations and Community (now Department of Agriculture, Water and the Environment [DAWE]) on 27 August 2012. The action was deemed a 'controlled action' under the EPBC Act on 27 September 2012, to be assessed by Preliminary Documentation. The action was conditionally approved on 6 November 2013 under EPBC 2012/6524. The original approval was issued jointly to GEH and the Western Australian Housing Authority. Subsequent to the issue of the approval, the State Government transferred its interest in the action and GEH was offered the option to purchase the Housing Authority share of the land, which it accepted.

A variation to EPBC 2012/6524 was approved on 23 July 2014, amending condition 2 and Attachment A, regarding a new offset site. This coincided with approval of the initial Rehabilitation Management Plan (RMP), required by condition 2, which was also approved on 23 July 2014.

The Project commenced on 28 April 2015.

A second variation to EPBC 2012/6524, submitted on 11 May 2015, was approved on 15 April 2016, amending condition 2 and Attachment B, which changed the offset location from Frankland Reserve to Bibra Lake, and required re-approval of the RMP (Revision 5).

A third variation to EPBC 2012/6524 was submitted to DAWE on 15 December 2015, requesting an amendment to condition 8 requiring the approval holder to submit all versions of management plans for Ministerial or delegate approval, and a variation to condition 9 regarding the Minister's request to make changes to the RMP. These variations were initially approved on 14 March 2016, however, an error was made by not including both the original approval holders on the variation, as a formal transfer of approval to GEH as the sole approval holder had not occurred. The variation was declared invalid on 23 March 2016 by DAWE. A notice of transfer of approval from GEH and Housing Authority to GEH was issued on 20 July 2016.

The purpose of the third variation request was to allow minor amendments to the RMP to address the City of Cockburn regulations that only non-native species were now permitted within the subdivision, with the exception of the native *Corymbia ficifolia* (a black cockatoo foraging species).

A fourth variation request to vary condition 8 was submitted to DAWE on 28 March 2018, to enable revisions of the RMP to be made without ministerial approval, providing that any proposed amendments would not result in an increased impact to the protected matter. The request was approved on 12 April 2018. Subject to condition 8 of EPBC 2012/6524, a revised RMP (Revision 6) was submitted to DAWE in May 2019 to notify them of the changes made.

A fifth variation request to EPBC 2012/6524 was submitted to DAWE on 9 December 2020, requesting an amendment to Attachment B of the approval whereby the “areas of existing vegetation retained” and “proposed retained vegetation” and “% of cockatoo habitat to be retained” layers in Attachment B of EPBC 2012/6524 were omitted. The request was approved on 21 December 2020. As part of this variation submission, a revised RMP (Rev 7) was submitted to DAWE to notify them of changes made to reflect the variation request.

## 2. Current status

Activities undertaken at the Vivente Estate during the audit period (28 April 2020 to 27 April 2021) involved the following:

- An additional 1,152m<sup>2</sup> of clearing was undertaken along the edges of POS H
- Stage 4 civil works were completed
- Stage 8 civil works commenced
- Drainage basin and retaining walls and under construction
- Maintenance and infill planting within POS A2 was completed
- Lighting installation in POS A2 was completed.
- a total of 2.5 ha (25,099 m<sup>2</sup>) of vegetation has been retained within the Development Envelope (Figure 1). This is in excess of 0.7 ha as required by the RMP.

# Vivente – EPBC Audit (2021)

The following plan identifies the areas of retained vegetation and compares the on ground and / or proposed retention areas to the current EPBC approval. Areas denoted in the light green are areas that have been revegetated

Please note that the information provided is based on a desktop appraisal and is subject to survey.

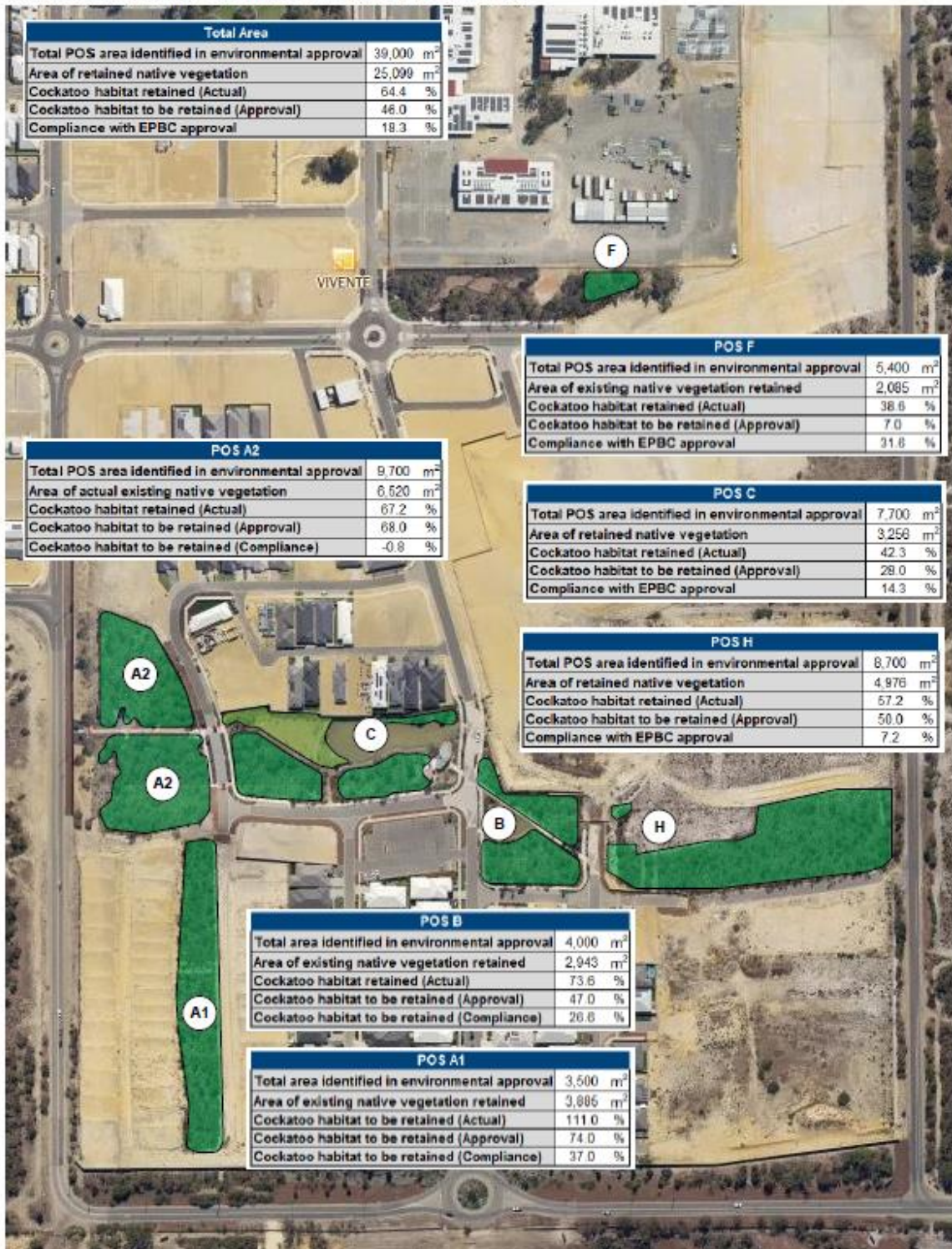


Figure 1. Retained and revegetated areas

### 3. Audit methodology

#### 3.1 Audit plan

##### 3.1.1 Purpose and scope

This document has been prepared for Richard Noble, on behalf of GEH to fulfil the requirements of condition 7 of EPBC 2012/6524. Condition 7 states:

*‘Within three months of every 12 month anniversary of the commencement of construction, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of the RMP 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. Non-compliance with any of the conditions of the approval must also be reported to the department within 2 business days of becoming aware of the non-compliance.’*

This ACR addresses the audit period between 28 April 2020 and 27 April 2021. The ACR addresses each condition of EPBC 2012/6524. Key management actions of the RMP (Revision 7) required by condition 2 of EPBC 2012/6524 were also assessed to determine whether the plan had been satisfactorily implemented.

Completion criteria identified in the RMP were also addressed (Appendix A).

##### 3.1.2 Methodology

The audit was undertaken in June 2021 and involved a site inspection with the Senior Development Manager from Richard Noble on 2 June 2021. A review of documentation to support the audit was also undertaken.

Table 3.1 provides an overview of the personnel consulted as part of the audit.

**Table 3.1: Persons consulted during audit**

Name	Position	Organisation
Peter Dockett	Senior Development Manager	Richard Noble
Ali Smyth	Development Manager	Richard Noble



### 3.2 Audit terminology

The Department of the Environment guidelines (DotE 2014) were applied in this audit. The 'Status' field of the audit tables (refer to Section 4 and Appendix A) describes the implementation of actions and compliance with the approval.

**Table 3.2: Action implementation status**

Status	Acronym	Description
<b>Conditions of approval</b>		
Compliant	C	All the requirements of a condition have been met, including the implementation of management plans or other measures required by condition.
Potentially non-compliant	PNC	The requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not applicable	N/A	The requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example; a condition which applies to an activity that has not yet commenced.
<b>Management Plans</b>		
Conformant	C	All the requirements of a key management action detailed within a subsidiary plan or program have been satisfactorily met.
Potentially non-conformant	PNC	All the requirements of a key management action detailed within a subsidiary plan or program have not been met satisfactorily.
Not applicable	N/A	The requirements of a management action fall outside of the scope of the current reporting period. For example; a condition which applies to an activity that has not yet commenced.

Source: Adapted from DotE (2014)

## 4. Audit results

The results of the audit of EPBC 2012/6524 are shown in Table 4.1. Condition 2 requires the preparation and implementation of the approved RMP. The results of conformance with the management actions contained within the RMP are outlined in Appendix A.

A total of 55 items were audited from EPBC 2012/6524 and the RMP.

### 4.1 Compliance with conditions of EPBC 2012/6524

The audit addressed 18 sub-conditions, of which, four conditions were found to be not applicable during the audit period. Of the remaining 14 conditions, GEH were found to be:

- compliant with four conditions
- assessed as having completed nine conditions
- potentially non-compliant with one condition

The potential non-compliance identified is administrative in nature as the revised RMP (Rev 7) was not uploaded to the Richard Noble website within one month of it being approved. Amendments made to the RMP as part of revision 7 were minor and, as confirmed by the delegate to the Minister do not lead to a new or increased impact to matters of national environmental significance.

### 4.2 Compliance with RMP

The audit addressed 30 actions of the RMP, of which GEH was found to be:

- conformant with 18 requirements
- assessed as having completed 10 requirements
- two requirements were not applicable during the audit period.

### 4.3 Compliance with RMP completion criteria

Completion criteria outlined in the RMP were assessed as part of the 2018 Natural Area (NAMS) Compliance Report. All criteria were found to be complete. It is recommended that an up-to-date monitoring event is undertaken to confirm all completion criteria are still being achieved and to facilitate handover of the offsite rehabilitation site once the approval expires.

**Table 4.1: EPBC 2012/6524 audit table**

Condition number	Condition	Timing	Evidence	Comments	Compliance status
EPBC 1	The person taking the action must not clear more than 22.92 ha of potential foraging habitat for endangered Carnaby's Black Cockatoo ( <i>Calyptorhynchus latirostris</i> ) and vulnerable Forest Red-tailed Black Cockatoo ( <i>Calyptorhynchus banksii naso</i> ) (black cockatoos).	Survey/map - prior to clearing commencing. Ongoing - check via annual compliance reporting.	R_005_Richard Noble_Retained and revegetated areas_01062021  G_001_The Civil Group_POS H Works Drawing_03022021  G_002_Richard Noble_POS H retained vegetation_29062021	An additional 1,152m <sup>2</sup> of clearing was undertaken during the audit period along the edges of POS H. This clearing was associated within a previously cleared access track to construct a drainage basin in POS H (R_005; G_001; G_002). The auditors note that as this condition does not specifically refer to the amount of clearing within each location, the clearing has been assessed on a site wide basis.  The total area of vegetation prior to clearing amounted to 22.92 ha (229,200 m <sup>2</sup> ) and when onsite deductions were taken into consideration (high school site, degraded vegetation, completely degraded vegetation cleared areas). Based on the retention of approximately 2.51 ha (25,099 m <sup>2</sup> ) within POS areas of potential foraging habitat vegetation the auditors conclude clearing cannot have exceeded the 22.92 ha limit (R_005).	Compliant
EPBC 2	To mitigate impacts to black cockatoos, the person taking the action must prepare and submit a Rehabilitation Management Plan (RMP) to the Minister for approval. The RMP must include, but not be limited to:	At least three months prior to commencement.	R_002_StrategenJBSG_Rehabilitation Management Plan (Rev7)_17112020  C_004_StrategenJBSG_Requets to vary conditions_09122020  C_005_DAWE_2012-6524-20201221-variation-letter to AH_211220	As per condition 8 of EPBC 2012/6524, the RMP was revised (revision 7) the Minister notified on 11 December 2020 (R_002; C_004).  The delegate of the Minister confirmed that the changes made in the revised RMP will not lead to a new or increased impact on matters of national environmental significance (C_005) and as such the RMP was implemented.	Compliant (Complete)
<i>Proposal site</i>					
EPBC 2a)	avoidance and mitigation measures to prevent impacts to black cockatoos during construction;	In preparation of RMP.	R03 - Rehabilitation Management Plan (Rev 7)	The approved RMP includes the required details. Refer to EPBC 2.	Compliant (Complete)
EPBC 2b)	details of tree species, number to be planted and location within the street scape and the POS;	In preparation of RMP.	Refer to EPBC 2a).		
EPBC 2c)	objectives, targets and completion criteria for seeding and planting programs within the street scape and POS;	In preparation of RMP.	Refer to EPBC 2a).		
EPBC 2d)	management measures to control weeds and erosion within the POS;	In preparation of RMP.	Refer to EPBC 2a).		
EPBC 2e)	details of monitoring, reporting and contingency measures if performance indicators are not met;	In preparation of RMP.	Refer to EPBC 2a).		
EPBC 2f)	timeframes for the implementation of the above measures; and	In preparation of RMP.	Refer to EPBC 2a).		
EPBC 2g)	roles and responsibilities of personnel associated with implementing each of the above measures.	In preparation of RMP.	Refer to EPBC 2a).		
<i>Bibra Lake Reserve</i>					
EPBC 2h)	details of revegetation of the 1.78 ha within Bibra Lake Reserve, at the 'rehabilitation site' shown in the map at Attachment A, including how seeds collected from the Proposal site will be utilised, and the species and number of plants that will be planted*;	In preparation of RMP.	Refer to EPBC 2a).	The RMP includes the required details. Refer to EPBC 2. <i>Note: Variation of condition 2 was approved on 15 April 2016 which changed the off-set location from Frankland Reserve to Bibra Lake.</i>	Compliant (Complete)
EPBC 2i)	objectives, targets and completion criteria for seeding and planting programs;	In preparation of RMP.	Refer to EPBC 2a).		
EPBC 2j)	management measures to control site access, weeds and erosion;	In preparation of RMP.	Refer to EPBC 2a).		
EPBC 2k)	details of monitoring, reporting and contingency measures if performance indicators are not met;	In preparation of RMP.	Refer to EPBC 2a).		
EPBC 2l)	timeframes from the implementation of the above measures; and	In preparation of RMP.	Refer to EPBC 2a).		
EPBC 2m)	roles and responsibilities of personnel associated with implementing each of the above measures.	In preparation of RMP.	Refer to EPBC 2a).		
EPBC 2	The RMP must be submitted to the department at least three months prior to the commencement of construction. If the Minister approves the RMP, the approved RMP must be implemented. Construction must not commence until the RMP is approved by the Minister.	Submission at least three months prior to commencement. Ongoing implementation.	C_001_StrategenJBSG_Hammond Park EPBC 2012 6524 2020 ACR submission_21072020  C_004_StrategenJBSG_Requets to vary conditions_09122020  C_005_DAWE_2012-6524-20201221-variation-letter to AH_211220	The Project commenced on 28 April 2015. The initial RMP was approved on 23 July 2014, at least three months prior to commencement of construction as required (C_001).  The current RMP (Rev 7) was submitted on 11 December 2020 and approved on the 20 December 2020 (C_004; C_005).	Compliant (Complete)
EPBC 3	The person taking the action must provide for an offset for the loss of black cockatoo habitat.	Prior to commencement.	C_001_StrategenJBSG_Hammond Park EPBC 2012 6524 2020 ACR submission_21072020	This item was assessed to be Compliant (Completed) in the previous ACR.	Compliant (Complete)

Condition number	Condition	Timing	Evidence	Comments	Compliance status
EPBC 4	To offset the loss of black cockatoo habitat, the person taking the action must:	Prior to commencement.	Refer to EPBC 4a) and 4b).	N/A.	Compliant (Complete)
EPBC 4a)	Prior to the commencement of construction, provide the department with written evidence of the provision of \$240,000 to DPaW for the acquisition of 107 ha of the offset property. The written evidence must include a textual description and map clearly defining the location and boundaries of the 107 ha within the offset property and be accompanied with the offset attributes and shapefile.	Prior to commencement.	C_001_StrategenJBSG_Hammond Park EPBC 2012 6524 2020 ACR submission_21072020	This item was assessed to be Compliant (Completed) in the previous ACR.	
EPBC 4b)	Prior to the commencement of construction, the person undertaking the action must provide the department with written evidence of the provision of \$10,000 to DPaW for the initial set-up for conservation protection of the 107 ha within the offset property.	Prior to commencement.	C_001_StrategenJBSG_Hammond Park EPBC 2012 6524 2020 ACR submission_21072020	This item was assessed to be Compliant (Completed) in the previous ACR (C01).	Compliant (Complete)
EPBC 4c)	If at any time the person taking the action is advised that the property cannot be acquired, the person taking the action must advise the department in writing of the situation and advise of steps being undertaken to provide for an acceptable alternative offset.	As required (Minister's request).	Refer to EPBC 4a) N/A.	This item was assessed to be Compliant (Completed) in the previous ACR (C01).	Compliant (Complete)
EPBC 5	Within 30 days after the commencement of construction, the person taking the action must advise the department in writing of the actual date of commencement.	Within 30 days following commencement of construction.	C_001_StrategenJBSG_Hammond Park EPBC 2012 6524 2020 ACR submission_21072020	This item was assessed to be Compliant (Completed) in the previous ACR.	Compliant (Complete)
EPBC 6	The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the 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 EPBC Act, or used to verify the 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.	Ongoing. As required (DotE decision).	This report.	Accurate records for the majority of applicable conditions and actions of the RMP have been maintained and were available at the time of the audit and following the audit.	Compliant
EPBC 7	Within three months of every 12-month anniversary of the commencement of construction, the person taking the action must publish a report on their website addressing compliance with each of 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.  Non-compliance with any of the conditions of the approval must also be reported to the department within two business days of becoming aware of the non-compliance.	Within three months of every 12 month anniversary commencement. Same day the compliance report is published. Within two business days of being aware of NC/PNC.	Management advice on 30 April 2020.  C_001_StrategenJBSG_Hammond Park EPBC 2012 6524 2020 ACR submission_21072020  R_003_Strategen JBSG_ACR July 2020_21072020	The 2020 ACR was published on the Richard Noble website on the 21 July 2020. The department was notified via email that the report had been published and a copy was provided on the same day (C_001; R_003).  A variation to condition 8 was approved on 12 April 2018 which enabled revisions to the RMP to be made without ministerial approval, provided that any proposed amendments would not result in an increased impact to the protected matter. It should be noted that compliance of varied condition 8 was not assessed as part of the 2020 ACR. However, given that this is an administrative error and that the RMP was not revised during the 2020 audit period, the auditors have concluded that this item remains Compliant.  EPBC 2012/6524 is due to expire on the 31 December 2021. Richard Noble has confirmed that the action (as defined in EPBC 2012/6525) has now been complete with all clearing of native vegetation undertaken. This report will therefore be the final ACR as required under condition 7 of EPBC 2012/6524. Management advised during the site audit that handover of the offsite rehabilitation site would occur after the EPBC 2012/6524 approval lapses as per advice provided by the then Department of Environment and Energy (now DAWE) to the City of Cockburn.	Compliant
EPBC 8	The person taking the action may choose to revise the plan approved by the Minister under condition 2 without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised plan would not be likely to have a new or increased impact. If the person taking the action makes this choice they must notify the department in writing that the approved plan has been revised and provide the department, at least four weeks before implementing the revised plan, with:  a) an electronic copy of the revised plan; b) an explanation of the differences between the revised plan and the approved plan; and c) the reasons the person taking the action considers that the taking of the	Prior to undertaking any activity otherwise than in accordance with the RMP. Implementation -	R_002_StrategenJBSG_Rehabilitation Management Plan (Rev 7)17112020  C_004_StrategenJBSG_Requets to vary conditions_09122020  C_005_DAWE_2012-6524-20201221-variation-letter to AH_211220	A revised RMP (Revision 7, R_002) was submitted to DAWE on 9 December 2020 to notify them of the changes made to reflect a variation which requested an amendment to Attachment B (C_004). In correspondence form the delegate of the Minister, the variation request was approved on 21 December 2020. As part of this approval notice, it was noted that the revised RMP will not lead to a new or increased environmental impact on matters of national environmental significance (C_005).  Refer to EPBC 2 and Appendix A for details of implementation of RMP	Compliant

Condition number	Condition	Timing	Evidence	Comments	Compliance status
	action in accordance with the revised plan would not be likely to have a new or increased impact.				
EPBC 8a)	The person taking the action may revoke its choice under condition 8 at any time by giving written notice to the department. If the person taking the action revokes the choice to implement the revised plan, without approval under section 143A of the EPBC Act, the plan approved by the Minister must be implemented.	As required.	N/A	Refer to EPBC 8.	N/A
EPBC 8b)	If the Minister gives a notice to the person taking the action that the Minister is satisfied that the taking of the action in accordance with the revised plan would be likely to have a new or increased impact, then:  a) condition 8 does not apply, or ceases to apply, in relation to the revised plan; and b) the person taking the action must implement the plan approved by the Minister.  To avoid any doubt, this condition does not affect any operation of conditions 8 and 8A 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 8 does not apply for the plan required under the approval.	As required (Minister's request).	N/A	Refer to EPBC 8.	N/A
EPBC 8c)	Conditions 8, 8A and 8B are not intended to limit the operation of section 143A of the EPBC Act which allows the person taking the action to submit a revised plan to the Minister for approval.	As required.	N/A	Refer to EPBC 8.	N/A
EPBC 9	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 person taking the action make specified revisions to the RMP specified in the conditions and submit the revised RMP for the Minister's written approval. The person taking the action must comply with any such request. The revised approved RMP must be implemented. Unless the Minister has approved the revised RMP, then the person taking the action must continue to implement the RMP originally approved, as specified in the conditions.	As required (Minister's request).	Management advice on 2 June 2021.	The Minister did not request revisions to the RMP.	N/A
EPBC 10	Unless otherwise agreed to in writing by the Minister, the person taking the action must publish the RMP referred to in these conditions of approval on their website. The RMP must be published on the website within 1 month of being approved.	Within one month of RMP approval.	C_004_StrategenJBSG_Requests to vary conditions_09122020  C_005_DAWES_2012-6524-20201221-variation-letter to AH_211220  W_001_Richard Noble_Website RMP Link_01062021  W_002_Richard Noble_Website RMP Link_21062021	The revised RMP (Rev 7) was submitted to the Department on the 11 December 2021 (C_004) subject to condition 8 of EPBC 2012/6524. Correspondence from the Department on 21 December 2020 indicated that the Plan was approved and to be implemented (C_005).  The Richard Noble website was checked on the 1 June 2021, and revision 6 of the RMP remained on the website (W_001). The auditors have therefore assessed this item as potentially non-compliant.  The auditors note that this potential non-compliance is administrative in nature. Amendments made to the RMP as part of revision 7 were minor and, as confirmed by the delegate to the Minister do not lead to a new or increased environmental impact to matters of national environmental significance (C_005). Furthermore, the objectives and management measures of the RMP were found to be satisfactorily implemented during the audit period (Appendix A).  Revision 7 of the Plan has since been uploaded to the Richard Noble website (W_002).	Potentially non-compliant

## 5. References

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

## 6. Limitations

### Scope of services

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

### Reliance on data

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

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

### Environmental conclusions

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

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

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## Appendix A Implementation of Rehabilitation Management Plan



Rehabilitation Management Plan audit table

Reference	Key action	Timing	Evidence	Comments	Conformance status
<i>Public Open Space (POS)</i>					
RMP 1	<p>Implement site inductions for all contractors prior to their commencement of work on site. The induction will detail the following:</p> <ul style="list-style-type: none"> <li>fauna management strategies</li> <li>hygiene management measures</li> <li>demarcation and areas of no entry</li> <li>waste management.</li> </ul> <p>Contractors will undertake works in accordance with an approved Construction Environmental Management Plan.</p>	Prior to rehabilitation and ongoing.	<p>R_004_Richard Noble_Construction activity plan_08062021</p> <p>R_010_Wormall_Wormall Stage 4 CEMP Compliance_01062021</p> <p>R_011_Wormall_Stage 8 CEMP Compliance_01062021</p> <p>R_012_Horizon West_Inductions_22062020</p> <p>R_013_Horizon West_Inductions_24032021</p> <p>R_014_Egmont Electrical_Induction_23092020</p> <p>R_015_Wormall_HSEQ Management Plan Stage 4_22072020</p> <p>R_016_Wormall_HSEQ Management Plan Stage 8_05022021</p> <p>R_017_Wormall_Stage 4 Inductions_0920</p> <p>R_018_Wormall_Stage 8 Inductions_0221</p> <p>R_024_Richard Noble_NAMS inductions_19072021</p> <p>R_025_Richard Noble_NAMS inductions_19072021</p> <p>R_026_Richard Noble_NAMS inductions_19072021</p>	<p>Works completed on site during the audit period (R_004) included minor clearing and construction of Stages 4 and 8 civil works and construction of POS H drainage which was conducted by Wormall in accordance with the Construction Environmental Management Plan and their Project Health Safety Environment and Quality Management Plan (R_010; R_011; R_015).</p> <p>Other minor works in POS A2 included maintenance and infill planting by Horizon West and lighting installation undertaken by Egmont Electrical (R_004).</p> <p>Included within each project induction is detail on fauna, hygiene and waste management measures and details on demarcation of areas of no entry of which Richard Noble provided records for contractors working in POS areas during the audit period (R_012-R_014; R_017-R_018; R_024-R_026).</p>	Conformant
RMP 2	Install signage indicating the area is being rehabilitated, including information summarising the purpose of rehabilitation works, key works undertaken, and access restrictions.	Prior to rehabilitation and ongoing.	R_003_StrategenJBSG_ACR July 2020_21072020	This item was assessed to be Completed in the previous ACR (R_003).	Conformant (Complete)
RMP 3	<p>Cordon off POS areas during clearing activities.</p> <p>All areas of retained vegetation will be identified using GPS coordinates referenced to the Civil Engineers site clearing drawing. Setting out of the works will be carried out by a qualified surveyor. No personnel may enter the area unless authorised by the Construction Manager.</p>	During clearing.	<p>Management advice during site visit on 02 June 2021.</p> <p>P_002_Wormall_POS H Bunting_19022020</p> <p>R_006_Richard Noble_POS H works_14062021</p> <p>G_001_The Civil Group_POS H Works Drawing_03022021</p>	<p>Clearing for civil works has been completed on site.</p> <p>Minor clearing within POS H was undertaken to facilitate construction of a drainage basin. Richard Noble provided evidence showing that areas of retained vegetation within POS H had been adequately demarcated and identified in engineer's drawings prior to works (P_002; R_019).</p>	Conformant
RMP 4	<p>Follow hygiene protocols to prevent the spread of weeds and dieback during access to the site:</p> <ul style="list-style-type: none"> <li>vehicles used in clearing and removing topsoil, excavation or transport are to be clean and free from soil or plant material prior to arriving on site from an area known or thought to be dieback infected. Cleaning should be conducted off site on bitumen areas surrounding the project area. In dry weather, this will be achieved by brushdown. Washdown with water and an appropriate reagent will be required during wet weather</li> <li>all drivers and plant operators are made aware of the need to have clean trucks and plant when initially arriving on or accessing the site</li> <li>machinery will work from higher vegetation condition to lower vegetation condition</li> <li>vehicles to use designated tracks</li> <li>footwear to be free of mud and soil when entering the Rehabilitation area</li> <li>all plants, seeds and other materials used in rehabilitation are sourced from dieback free areas.</li> </ul>	<p>During clearing.</p> <p>Construction phase.</p> <p>During rehabilitation.</p>	<p>Management advice during site visit on 02 June 2021.</p> <p>R_007_Wormall_Hygiene Machine Wash Brush Down Register Stage 8_08032021</p> <p>R_008_Wormall_Hygiene Machine Wash Brush Down Register Stage 4_25082020</p> <p>R_009_Wormall_Hygiene Machine Wash Down Register Stage 8_01062021</p> <p>C_002_Horizon West_Plants from Planttire_29062020</p> <p>C_003_Horizon West_Vivente Top Up Planting_29062020</p> <p>W_003_Plantrite_Website NIASA Accreditation_21062021</p>	<p>Management confirmed that hygiene protocols are established and personnel working on the project are aware of the need to adhere to hygiene protocols. Machine wash down registers were provided by Wormall with dates and details of the vehicles that entered site and were washed down during Stage 4 and Stage 8 works (R_007-R_009).</p> <p>In correspondence between Horizon West and Richard Noble, it was confirmed that no machinery/vehicles were used during the POS A2 infill planting (C_003). Furthermore, Horizon West confirmed that plants used during POS A2 infill planting were sourced from Plantrite (C_002), a NIASA certified nursery.</p>	Conformant

Reference	Key action	Timing	Evidence	Comments	Conformance status
RMP 5	Install temporary fencing or tree guards, and signage around revegetation areas to prevent unauthorised access and fauna entry.	Prior to commencement of revegetation for fencing and signage. At the time of planting for tree guard installation.	R_027_NAMS_2021 Annual Compliance Report_14072021 C_006_Richard Noble_RE_EPBC 2012_6524 Annual Compliance Audit – Additional Info Required_24062021 P_003_Richard Noble_POS A2 fencing_26102020 P_004_Richard Noble_POS A2 fencing_06052020	Tree guards were installed to tubestock at the Vivente Estate site during 2017 planting works. Tree guards were also installed to the tubestock at the Vivente Estate site during the infill planting in 2019 and 2020. The tree guards on the 2019 infill planting were removed in June 2020. As the Bibra Lake offset site is fenced (including rabbit mesh apron), tree guards were not required at this site (R_027).  Management advised that infill planting was undertaken in POS A2 during the audit period. The auditor notes that the area was fenced along Frankland Avenue and inaccessible to the public (C_006; P_003; P_004). During the site inspection it was noted that the plants were in good health and there was no evidence of predation, unauthorised access, or wind damage.	Conformant
RMP 6	Undertake weed mapping of the rehabilitation sites (revegetation areas and retained vegetation areas).	Prior to commencement of clearing.	R_003_StrategenJBSG_ACR July 2020_21072020	This item was assessed to be Completed in the previous ACR (R_003).	Conformant (Complete)
RMP 7	Undertake ongoing maintenance weed control (as described in section 4.1) through a combination of manual removal / spraying of herbicide within retained vegetation areas and continue weed control measures until handover to the City of Cockburn.	During rehabilitation.	R_027_NAMS_2021 Annual Compliance Report_14072021	Herbicide application, hand weeding and mechanical (brush cutting) weed control was undertaken at the Vivente site and the Bibra Lake offset site during the audit period (R_027).	Conformant
RMP 8	Undertake a combination of manual and chemical weed control (as described in section 4.1) of on-site rehabilitation areas for at least one year prior to broad cast seeding.	Construction phase.	Refer to RMP 7.	Refer to RMP 7.	Conformant
RMP 9	Undertake site preparation such as ripping and mounding of on-site rehabilitation areas as described in section 4.3 prior to direct seeding.	Prior to direct seeding.	R_027_NAMS_2021 Annual Compliance Report_14072021	There was no direct seeding in rehabilitation areas during the audit period, so site preparation was not required (R_027).	N/A
RMP 10	Undertake direct seeding and infill planting as described in section 4.4.	After the completion of one year of weed control.	C_006_Richard Noble_RE_EPBC 2012_6524 Annual Compliance Audit – Additional Info Required_24062021 P_003_Richard Noble_POS A2 fencing_26102020 P_004_Richard Noble_POS A2 fencing_06052020 R_002_StrategenJBSG_Rehabilitation Management Plan (Rev 7)_17112020	Management advised that the infill planting was undertaken in POS A2 during the audit period.  The auditor notes that the area was fenced along Frankland Avenue and inaccessible to the public (C_006; P_003; P_004). During the site inspection it was noted that the plants were in good health and there was no evidence of predation, unauthorised access or wind damage.	Conformant
RMP 11	Undertake ongoing maintenance weed control (as described in section 4.1) through manual removal / spraying of herbicide and continue weed control measures.	Up to two years or until completion criteria are met.	Refer to RMP 7.	Refer to RMP 7.	Conformant
RMP 12	Undertake opportunistic visual inspections of the rehabilitated profiles to ensure erosion is not taking place.	Opportunistically.	Site inspection 2 June 2021	Management confirmed that opportunistic erosion monitoring is conducted through the year by development staff. The staff look for erosion and areas that infill planting would assist revegetation efforts.  Erosion monitoring was also conducted opportunistically during the site inspection.	Conformant
<b>Completion criteria – POS retained vegetation areas</b>					
POS CC 1	No evidence of declining vegetation health and death of susceptible species at the Site, which are attributable to Project activities during the duration of the rehabilitation management plan.	For the duration of rehabilitation.	Site inspection 2 June 2021 R_027_NAMS_2021 Annual Compliance Report_14072021	No evidence of declining vegetation health and death of susceptible species at the site attributable to project activities were identified during the site inspection.  Completion criteria was assessed as part of the 2018 NAMS Compliance Report of which found rehabilitation criteria had been met. The auditor recommends an up-to-date monitoring event be undertaken to confirm all completion criteria is still being achieved prior to the end of the approval period.	Conformant
POS CC 2	Weed control is implemented as per the rehabilitation management plan.	For the duration of rehabilitation.	R_027_NAMS_2021 Annual Compliance Report_14072021	Herbicide application, hand weeding and mechanical (brush cutting) weed control is undertaken at the Vivente site in accordance with the rehabilitation management plan (R_027).  Completion criteria was assessed as part of the 2018 NAMS Compliance Report of which found rehabilitation criteria had been met. The auditor recommends an up-to-date monitoring event be undertaken to confirm all completion criteria is still being achieved prior to the end of the approval period.	Conformant
<b>Completion criteria – POS revegetation areas</b>					

Reference	Key action	Timing	Evidence	Comments	Conformance status
POS CC 3	Revegetate 0.3 ha of degraded land within POS areas.	For the duration of rehabilitation.	R_003_StrategenJBSG_ACR July 2020_21072020 R_027_NAMS_2021 Annual Compliance Report_14072021	Revegetation has been undertaken in the bare areas of the Vivente Estate site, which cover 0.3 ha. Installation of 2,290 tubestock was undertaken in 2016 and installation of 630 tubestock occurred in winter 2017.  Completion criteria was assessed as part of the 2018 NAMS Compliance Report of which found rehabilitation criteria had been met. The auditor recommends an up-to-date monitoring event be undertaken to confirm all completion criteria is still being achieved prior to the end of the approval period.	Conformant
POS CC 4	Enhance the vegetation condition of degraded areas of POS (via direct seeding and/ or planting seedlings) by increasing the species richness of native flora to at least 12 species within two years of establishment.	For the duration of rehabilitation.	R_003_StrategenJBSG_ACR July 2020_21072020	25 species were installed in the Vivente Estate POS areas in 2016 and 2017. Based on the 2018 Natural Area rehabilitation report, total native species diversity was 47 species as a result of planting works and natural recruitment on the site (R_003).  The auditor recommends an up-to-date monitoring event be undertaken to confirm all completion criteria is still being achieved prior to the end of the approval period.	Conformant
POS CC 5	At least 50% of tree and shrub species planted within revegetation areas are to be primary foraging plants for black cockatoo species.	For the duration of rehabilitation.	R_003_StrategenJBSG_ACR July 2020_21072020	1,160 of the plants installed in 2016 and 342 of the plants installed in 2017 were primary foraging plants for black cockatoo species, representing 51.4% of the total plants installed (R_011).  Completion criteria was assessed as part of the 2018 NAMS Compliance Report of which found rehabilitation criteria had been met. The auditor recommends an up-to-date monitoring event be undertaken to confirm all completion criteria is still being achieved prior to the end of the approval period.	Conformant
POS CC 6	Revegetation to be undertaken with local provenance species approved to at least 5000 stems/ha to achieve a minimal survival rate of 70 – 80% over two years.	For the duration of rehabilitation.	R_003_StrategenJBSG_ACR July 2020_21072020	Installation of 8,000 stems per ha was the minimum requirement of the RMP, with the expectation that the remaining 8,000 stems per ha would be recruited from the onsite seed bank. Over 2016 and 2017, 2,920 plants have been installed at a density of 9,733 stems/ha over the 0.3 ha revegetation areas. As of 2018 monitoring, average stem density was 20.6/m <sup>2</sup> (206,000 stems/ha) (R_003).  Completion criteria was assessed as part of the 2018 NAMS Compliance Report of which found rehabilitation criteria had been met. The auditor recommends an up-to-date monitoring event be undertaken to confirm all completion criteria is still being achieved prior to the end of the approval period.	Conformant
POS CC 7	No introduction of new weed species and existing species are not spread (i.e., total weed cover is no more than 10% of baseline weed cover).	For the duration of rehabilitation.	R_003_StrategenJBSG_ACR July 2020_21072020	No new weed species were recorded during the 2018 monitoring event, and weed coverage was 2.8%, below the cover target (R_003).  Completion criteria was assessed as part of the 2018 NAMS Compliance Report of which found rehabilitation criteria had been met. The auditor recommends an up-to-date monitoring event be undertaken to confirm all completion criteria is still being achieved prior to the end of the approval period.	Conformant
<b>On-site – street trees</b>					
RMP 13	Determine number of trees required for planting and select black cockatoo preferred foraging species in accordance with planting lists (RMP Appendix B).	Construction phase.	Site inspection 02 June 2021 R_002_StrategenJBSG_Rehabilitation Management Plan (Rev 7)_17112020 R_022_Richard Noble_Street Tree Audit 2021_23062021	The Vivente Street Tree Plan indicates that the street tree mix includes <i>Corymbia ficifolia</i> (Red Flowering Gum), <i>Liquidambar styraciflua</i> (Liquidambar) and <i>Gleditsia tricanthos</i> (Golden honey locust). These species are the only street tree species permitted by the City of Cockburn. This list aligns with the planting palette provided as Appendix 2 of the RMP.	Conformant
RMP 14	Undertake tree planting within median strips and areas adjoining POS.	Construction phase in spring.	Site inspection 02 June 2021 R_002_StrategenJBSG_Rehabilitation Management Plan (Rev 7)_17112020 R_022_Richard Noble_Street Tree Audit 2021_23062021	Planting has been undertaken along median strips and areas adjoining POS (R_002, R_022), during this audit period.	Conformant
RMP 15	Black cockatoo preferred foraging species will not be planted along roads with speed limits exceeding 50 km/hr.	Construction phase.	Site inspection 02 June 2021 R_022_Richard Noble_Street Tree Audit 2021_23062021	Management advised that all streets where street trees are planted have a maximum speed limit of 50 km/hr due to all of the roads being residential streets. This is a requirement of the Street Tree implementation plan (R_022).	Conformant
RMP 16	Undertake fortnightly watering of planted street trees (median strips and adjoining POS areas only) from October to March for up to two years, except following rains.	Fortnightly from October to March, for up to two years.	R_022_Richard Noble_Street Tree Audit 2021_23062021	Management advised that street trees are generally connected to the reticulation of the adjoining dwelling, therefore fortnightly watering is not	Conformant

Reference	Key action	Timing	Evidence	Comments	Conformance status
				required. Where street trees are in the public realm, they are irrigated for a minimum of two years (R_022).	
<i>Completion criteria – Street trees</i>					
Street Trees CC 1	At least 50% of tree and shrub species planted to be primary foraging plants for black cockatoo species.	For the duration of rehabilitation.	R_022_Richard Noble_Street Tree Audit 2021_23062021	<p>The City of Cockburn requires that only non-native tree species are permitted within subdivision areas, with the exception of <i>Corymbia ficifolia</i>.</p> <p>Based on the restrictions in place on developers by the City, the following species are to be planted in the streetscape:</p> <ul style="list-style-type: none"> <li>• <i>Corymbia ficifolia</i> (black cockatoo foraging species)</li> <li>• <i>Liquidambar styraciflua</i> (black cockatoo foraging species)</li> <li>• <i>Gleditsia triacanthos</i> (non-black cockatoo foraging species).</li> </ul> <p>These species are included in Appendix 1 and 2 of the RMP and do not affect the achievement of the 50% black cockatoo species planting target, given that two of the three street trees proposed are black cockatoo foraging species.</p> <p>As per the street tree audit, 100% of trees planted are black cockatoo species (R_022). Based on the restrictions in place by the Council and the proposed street tree planting regime, the auditors conclude that this item has been complete.</p>	Conformant (Complete)
Street Trees CC 2	Tree planting to be undertaken in accordance with the Landscape Master Plan (Appendix B).	For the duration of rehabilitation.	R_022_Richard Noble_Street Tree Audit 2021_23062021	Refer to Street Trees CC 2.	Conformant (Complete)
<i>Off-site - site preparation and survey</i>					
RMP 17	Undertake dieback mapping at the rehabilitation site.	To commence following identification of the off-site rehabilitation location.	R_003_StrategenJBSG_ACR July 2020_21072020	This item was assessed to be Completed in the previous ACR (R_003).	Conformant (Complete)
RMP 18	Undertake weed mapping of the rehabilitation site.	To commence following identification of the off-site rehabilitation location.	R_003_StrategenJBSG_ACR July 2020_21072020	This item was assessed to be Completed in the previous ACR (R_003).	Conformant (Complete)
RMP 19	Undertake weed control (as described in section 4.1) at off-site rehabilitation area as required for at least one year prior to commencing rehabilitation activities.	To commence following identification of the off-site rehabilitation location.	R_003_StrategenJBSG_ACR July 2020_21072020	This item was assessed to be Completed in the previous ACR (R_003).	Conformant (Complete)
RMP 20	Determine the quantity of Carnaby's Cockatoo and Forest Red-tailed Black Cockatoo foraging species based on specific site requirements (following selection of the off-site area) required for rehabilitation site. Engage contractors to undertake the necessary seed collection from areas at the Hammond Park residential development site designated for clearing.	Prior to clearing of proposal site.	R_003_StrategenJBSG_ACR July 2020_21072020	This item was assessed to be Completed in the previous ACR (R_003).	Conformant (Complete)
RMP 21	Install fencing and signage around rehabilitation areas to restrict unauthorised access and fauna entry for the duration of the rehabilitation program.	Prior to commencement of rehabilitation.	R_003_StrategenJBSG_ACR July 2020_21072020	This item was assessed to be Completed in the previous ACR (R_003).	Conformant (Complete)
<i>Off-site - site work and topsoil transfer</i>					
RMP 22	Undertake topsoil harvesting of the top 10 cm from on-site cleared areas for transfer to off-site rehabilitation area.	Immediately following on-site clearing.	R_003_StrategenJBSG_ACR July 2020_21072020	This item was assessed to be Completed in the previous ACR (R_003).	Conformant (Complete)
RMP 23	Transfer topsoil to off-site rehabilitation area and respread to a maximum depth of 10 cm.	Prior to seeding and planting.	R_003_StrategenJBSG_ACR July 2020_21072020	This item was assessed to be Completed in the previous ACR (R_003).	Conformant (Complete)
<i>Off-site - rehabilitation</i>					
RMP 24	Undertake a combination of site preparation techniques (as described in section 4.3) prior to direct seeding.	Prior to direct seeding.	R_003_StrategenJBSG_ACR July 2020_21072020	This item was assessed to be Completed in the previous ACR (R_003).	Conformant (Complete)
RMP 25	Undertake direct seeding and infill planting as described section 4.4.	After the completion of one year of weed control (unless scalping used to	R_027_NAMS_2021 Annual Compliance Report_14072021	There was no direct seeding undertaken during the audit period (R_027).	N/A

Reference	Key action	Timing	Evidence	Comments	Conformance status
		control weeds, refer to section 4.1).			
RMP 26	Undertake ongoing maintenance weed control (as described in section 4.1) through manual removal / spraying of herbicide and continue weed control measures.	During winter and spring, for up to two years post-planting or until completion criteria are met.	R_027_NAMS_2021 Annual Compliance Report_14072021	Herbicide application, hand weeding and mechanical (brush cutting) weed control was undertaken at the Bibra Lake offset site during the audit period (R_027).	Conformant
<i>Off-site - hygiene measures</i>					
RMP 27	Induct all personnel in relation to weed and dieback risk, potential impacts and management.	Prior to personnel commencing work on-site.	R_027_NAMS_2021 Annual Compliance Report_14072021	The Richard Noble induction acknowledgement sheet was supplied as evidence that NAMs personnel have been inducted prior to conducting works at the Bibra Lake offset site (R_027). Personnel signed that they acknowledged the following items from the rehabilitation management plan: <ul style="list-style-type: none"> <li>• fauna management strategies</li> <li>• hygiene management strategies</li> <li>• demarcation and areas of no entry</li> <li>• waste management.</li> </ul>	Conformant
RMP 28	Ensure vehicles used in clearing and removing topsoil, excavation or transport are clean and free from soil or plant material prior to arriving on site. Cleaning should be conducted off site on bitumen areas surrounding the project area. In dry weather, this will be achieved by brush down. Washdown with water and an appropriate reagent will be required during wet weather.	During clearing, topsoil transfer and rehabilitation.	R_020_NAMS_SOP-HSEQ-029 Dieback Hygeine_04062020	Dieback protocols are included within the Natural Area dieback safe operating procedures (R_020).	Conformant
RMP 29	Ensure all plants; seeds and other material used in rehabilitation are free of dieback and weeds.	During rehabilitation.	R_027_NAMS_2021 Annual Compliance Report_14072021	No Direct seeding was undertaken at the Bibra Lake offset site during the audit period. (R_027).	N/A
RMP 30	Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering rehabilitation area.	During rehabilitation.	R_020_NAMS_SOP-HSEQ-029 Dieback Hygeine_04062020	Dieback protocols are included within the Natural Area revegetation and planting and chemical weed safe operating procedures (R_020).	Conformant
<i>Completion Criteria – Off-site rehabilitation</i>					
Offsite CC 1	Promote vegetation growth (via topsoil transfer, direct seeding, and infill planting) with local provenance species to achieve a total species richness of at least 12 native species.	During rehabilitation.	R_003_StrategenJBSG_ACR July 2020_21072020	Completion criteria was assessed as part of the 2018 NAMS Compliance Report of which found rehabilitation criteria had been met. The auditor recommends an up-to-date monitoring event be undertaken to confirm all completion criteria is still being achieved prior to the end of the approval period and to support handover of the site to the City of Cockburn.	Conformant
Offsite CC 2	Where percentage cover of remnant vegetation is less than 50%, infill planting will be undertaken at a density of 5000 stems/ha.	During rehabilitation.	Refer to Offsite CC 1.	Refer to Offsite CC 1.	Conformant
Offsite CC 3	At least 50% of tree and shrub species planted to be primary foraging plants for black cockatoo species.	During rehabilitation.	Refer to Offsite CC 1.	Refer to Offsite CC 1.	Conformant
Offsite CC 4	No introduction of new weed species, and existing species are not spread (as compared to baseline weed mapping collected at the offsite area and the on-site topsoil collection site prior to commencement of clearing).	During rehabilitation.	Refer to Offsite CC 1.	Refer to Offsite CC 1.	Conformant


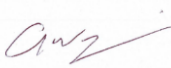
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