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# 'Lakelands East' Residential Development, Mandurah, WA

Annual Compliance Report  
(EPBC 2013/7048)

Prepared for  
Peet Mandurah Syndicate Limited  
by Strategen

May 2017



**'Lakelands East' Residential  
Development, Mandurah,  
WA**

**Annual Compliance Report  
(EPBC 2013/7048)**

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May 2017

## ***Limitations***

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### **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.

## **Client: Peet Mandurah Syndicate Limited**

| Report Version | Revision No. | Purpose                         | Strategen author / reviewer | Submitted to Client |               |
|----------------|--------------|---------------------------------|-----------------------------|---------------------|---------------|
|                |              |                                 |                             | Form                | Date          |
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## Declaration of accuracy

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

Signed

Trevor Finlayson

Full name (please print)

Trevor Finlayson

Position (please print)

Senior Development Manager

Organisation (please print including ABN/ACN if applicable)

Peet Limited. ABN 56 008 665 834

Date

1, 5, 17



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## 1. Introduction

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

### 1.1 Project background

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

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

### 1.2 Environmental approval to implement the project

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

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

## 2. Current status

Activities undertaken during the audit period (2 February 2016 to 1 February 2017) included:

- completion of Stage 65 civil works
- completion of Stage 64 civil works
- Stage 66 earthworks completed and civil works commenced
- revegetation works around Black Swan Lake.

### 3. Audit methodology

#### 3.1 Audit plan

##### 3.1.1 Purpose and scope

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

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

This Annual Compliance Report (ACR) addresses the audit period between 2 February 2016 and 1 February 2017 for the conditions of EPBC 2013/7048 and implementation of the Revegetation Management Plan (RMP) required by conditions 3 and 4 of EPBC 2013/7048.

##### 3.1.2 Methodology

The audit was undertaken in March and April 2017 and involved a site inspection, interviews with key members of the project team and a review of documentation to support the audit.

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

Table 1 Persons consulted during audit

| Person and position | Organisation | Purpose  |
|---------------------|--------------|--|
| Trevor Finlayson    | Peet         | To provide an overview of activities undertaken on site during the audit period to assess implementation and performance of EPBC 2013/7048 conditions and RMP. |
| Jaymi Davies        | Peet         | To provide an overview of activities undertaken on site during the audit period to assess implementation and performance of EPBC 2013/7048 conditions and RMP. |

#### 3.2 Audit terminology

The 'Status' field of the audit tables (refer to Section 4) describes the implementation of actions and compliance with the approval. The Department of the Environment and Energy (DEE, formerly DotE [2014]) has issued Annual Compliance Report Guidelines and terminology from this guidance was applied in this audit (Table 2).

Table 2 Action implementation status

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

Source: adapted from DotE (2014)

## 4. Audit results

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

A total of 84 items were audited from EPBC 2013/7048 and RMP.

### 4.1 Compliance with conditions

Of 24 sub-conditions:

- 13 were found to be 'Compliant', with three of those 'Compliant (completed)'
- 11 were found to be 'Not applicable'.

No potential non-compliances with conditions of EPBC 2013/7048 (Table 3) was identified during the audit.

#### 4.1.1 Conformance with the Revegetation Management Plan

Of 60 key actions identified from the RMP:

- 2 were found to be 'Potentially non-conformant'
- 24 were found to be 'Conformant' with two of those 'Conformant (completed)'
- 34 were found to be 'Not applicable'.

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

- RMP 32, regarding the timing of seedling planting – this was a very technical potential non-conformance, with no materially adverse outcome expected (in fact the actual timing may have been a better outcome due to the conditions at the time.
- RMP 41, regarding the establishment of conservation covenant; Peet advised the covenant documentation remained in preparation at the end of the audit period and that they aim to complete the process in the 2017-18 audit period; the auditors do not expect the objectives of the RMP to be compromised by the delay.

As most applicable actions, including all on-ground revegetation activities, have been found to be conformant, and the potential conformance issues were assessed as minor, Peet was found to be Compliant with the requirement to implement the RMP.

Table 3: Compliance with conditions of EPBC 2013/7048

| Condition Number | Condition   | Compliance status      | Evidence   | Comments   |
|------------------|---|------------------------|--|--|
| EPBC 1.1         | The approval holder must not clear any black cockatoo habitat trees outside of the project area.  | Compliant.             | Management advice 22 March 2017.<br>Site inspection 22 March 2017.<br>R_010_Strategen_Lakelands East Annual Compliance Report_11032016.<br>C_001_Peet_EPBC Conditions_28032017.<br>R_011_MNG_Lakelands East Extent of Cleared Areas_04072016.<br>R_013_Strategen_Feb2017_24042107. | As discussed in the first ACR (R_004) the wording of the condition is ambiguous to the extent it does not contain sufficiently defined parameters identifying what constitutes "outside the project area". Strategen has discussed the condition with DotE, which advised that from the Department's perspective there is sufficient detail in the conditions, definitions and Attachment A of EPBC 2013/7048, such that the intent of the condition is clear. Based on this departmental advice, permitted clearing relates to the blue hatched area ('Development Area') at Attachment A, and any clearing outside of this area, but within the proposal area (red boundary) is what constitutes 'outside the project area.' Furthermore, the referral area as depicted in Attachment A of the approval is what was assessed as part of the EPBC Act referral process and approved with conditions; therefore, any area outside of the proposed action is not subject to the conditions, unless otherwise specified.<br><br>Based on the departmental advice, the auditors accept the interpretation of the condition as described in the preceding paragraph.<br><br>Clearing for Stage 66 clearing occurred between May-June 2016. No other clearing occurred between June 2016 and the end of the audit period (R_011, R_013) |
| EPBC 2.1         | The approval holder must retain no less than three hundred and three (303) black cockatoo habitat trees, including no less than one hundred and twenty (120) potential breeding trees and no less than one hundred and eighty-three (183) foraging species within the project area. | Compliant.             | Management advice 22 March 2017.<br>Site inspection 22 March 2017.<br>R_012_Strategen_Lakelands East - Mandjoogoordap Drive, Mandurah Significant Tree Survey Results_02082016.<br>R_011_MNG_Lakelands East Extent of Cleared Areas_04072016.<br>R_013_Strategen_Feb2017_24042107. | A tree survey (R_012) undertaken on 6 July 2016 identified that of the 129 potential breeding trees originally identified to be retained, 126 potential breeding trees remain (one of these potential breeding trees was identified as only potentially to be retained after 'the Hilltop tank' was introduced earlier in 2016). Two trees appeared to have been illegally removed and one tree has fallen down naturally. The survey indicates that more than 120 breeding trees have been retained to date.<br><br>Although each intact tree was not individually counted, aerial photography (R_011, R_013) indicates most of the project area remains uncleared, including areas containing most foraging species, on this basis the auditors consider 183 trees have been retained.   |
| EPBC 3.1         | To compensate for the loss of black cockatoo habitat trees, within one month of the date of the approval, the approval holder must prepare and submit a Revegetation Management Plan (RMP) for the Ministers approval to revegetate within the offset site.                         | Compliant (completed). | R_010_Strategen_Lakelands East Annual Compliance Report_11032016.  | This obligation has been previously assessed as Compliant (R_010).<br><br>The current, revised, version (Rev 5) was submitted to the then-DotE on 8 January 2015 and approved on 12 January 2015.  |

| Condition Number | Condition   | Compliance status      | Evidence  | Comments   |
|------------------|---|------------------------|---|--|
| EPBC 3.2         | The approval holder must not commence the action unless the Minister has approved the RMP.  | Compliant (completed). | R_010_Strategen_Lakelands East Annual Compliance Report_11032016. | This obligation has been previously assessed as Compliant (R_010).               |
| EPBC 3.3         | <p>The RMP must include, but may not be limited to:</p> <ul style="list-style-type: none"> <li>a. Objectives of the RMP;</li> <li>b. Location, condition, size and suitability of the revegetation areas within the offset site;</li> <li>c. Detailed information on each stage of the revegetation project;</li> <li>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;</li> <li>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;</li> <li>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;</li> <li>g. Monitoring program, including the type, timing and frequency of monitoring;</li> <li>h. Responsibilities for planning, implementing, management, reporting and monitoring the RMP;</li> <li>i. Timeframes for the implementation of each stage of the RMP;</li> <li>j. Details on the conservation</li> </ul> | Compliant.             | Refer to EPBC 3.2.  | The RMP (R_001) includes the required details. Refer to EPBC 3.2 – RMP approved. |

| Condition Number | Condition  | Compliance status | Evidence  | Comments  |
|------------------|--|-------------------|---|---|
|                  | mechanism to protect and conserve the offset site.   |                   |   |   |
| EPBC 4.1         | If the Minister approves the RMP, then the approval holder must implement the approved RMP.  | Compliant.        | Refer to Appendix 1.  | <p>Refer to Appendix 1.</p> <p>Of 60 key actions identified from the RMP:</p> <ul style="list-style-type: none"> <li>• 2 were found to be 'Potentially non-conformant'</li> <li>• 2 were found to be 'Completed'</li> <li>• 22 were found to be 'Conformant'</li> <li>• 34 were found to be 'Not applicable'.</li> </ul> <p>The two actions found to be potentially non-conformant were:</p> <p>RMP 32, regarding the timing of seedling planting – this was a very technical potential non-conformance, with no materially adverse outcome expected (in fact the actual timing may have been a better outcome due to the conditions at the time.</p> <p>RMP 41, regarding the establishment of conservation covenant. Peet advised the covenant documentation remained in preparation at the end of the audit period and that they aim to complete the process in the 2017-18 audit period. The auditors do not expect the objectives of the RMP to be compromised by the delay.</p> <p>As most applicable actions, including all on-ground revegetation activities, have been found to be conformant, Peet was found to be Compliant with the requirement to implement the RMP.</p> |
| EPBC 5.1         | <p>To avoid and mitigate impacts to black cockatoos, if clearing is to be undertaken during the breeding season (July - November), within 7 days prior to clearing, the approval holder must ensure all potential nesting trees within the project area are investigated to detect the presence of black cockatoos using hollows. The investigation must be undertaken by a suitably qualified and experienced person. If any black cockatoos are detected using a hollow in a tree or trees, the approval holder must:</p> <ol style="list-style-type: none"> <li>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;</li> <li>2. not clear any such tree of any vegetation within 10 metres of any such tree; and</li> <li>3. undertake all reasonable measures to avoid any such tree from being cut down, felled, removed, killed, destroyed,</li> </ol> | Compliant.        | <p>Management advice 22 March 2017.</p> <p>Site inspection 22 March 2017.</p> <p>R_012_Strategen_Lakelands East - Mandjoogoordap Drive, Mandurah Significant Tree Survey Results_02082016.</p> <p>R_011_MNG_Lakelands East Extent of Cleared Areas_04072016.</p> <p>R_013_Strategen_Feb2017_24042107.</p> | <p>Strategen were advised by Peet that no clearing of breeding trees was undertaken during the breeding season. An extent of clearing survey was undertaken at the start of the breeding season (30 June 2016, R_011). Aerial imagery from February 2017 shows no further clearing occurred in the audit period (R_013).</p>  |



| Condition Number | Condition   | Compliance status      | Evidence  | Comments   |
|------------------|---|------------------------|---|--|
|                  | 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.  |                        |   |  |
| EPBC 6.1         | Within 30 days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.  | Compliant (completed). | R_010_Strategen_Lakelands East Annual Compliance Report_11032016. | This obligation has been previously assessed as Compliant (R_010).   |
| EPBC 7.1         | The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the RMP, required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the Environment Protection and Biodiversity Conservation Act 1999, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media. | Compliant.             | Not applicable (refer to all other assessment items).             | Peet has provided the auditors with records substantiating all activities associated with or relevant to the conditions of approval for all applicable conditions.   |
| EPBC 8.1         | Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of the RMP, over the previous 12 months, as specified in the conditions.   | Not applicable.        | C_014_DEE_FW EPBC 20137048 Annual Compliance Report_30032016.     | The first ACR, addressing compliance with each of the conditions of this approval, including implementation of the RMP, was completed in March 2016, with DEE notified of publication on 29 March 2016 (C_014). The notification included a link to the ACR on the Peet website. |
| EPBC 8.2         | Documentary evidence providing proof of the date of publication must be provided to the Department at the same time as the compliance report is published.  | Compliant.             | Refer to EPBC 8.1.  | Refer to EPBC 8.1.   |
| EPBC 8.3         | The compliance reports must remain on the website for the life of the approval.   | Compliant.             | Refer to EPBC 8.1.<br>C_001_Peet_EPBC Conditions_28032017.        | The 2015-16 ACR remained available on 28 March 2017 on the Peet website, after the audit period.   |
| EPBC 8.4         | All contraventions must also be included in the compliance reports.   | Not applicable.        | Refer to EPBC 8.1.  | One potential non-compliance was identified in the 2015-16 ACR, regarding timing of publication of the RMP on the Peet website.  |

| Condition Number | Condition   | Compliance status | Evidence   | Comments  |
|------------------|---|-------------------|--|---|
| EPBC 8.5         | Unless otherwise agreed to in writing by the Minister, the approval holder must provide a copy of each compliance report to members of the public upon request. Copies must be provided free of charge as soon as reasonably practicable but within no longer than 7 days of the request. | Not applicable.   | Refer to EPBC 8.1.<br>C_001_Peet_EPBC Conditions_28032017<br>Management advice 22 March 2017.  | The ACR is publically available through the Peet website (C_001). Peet advised it had not received any specific request for the ACR.  |
| EPBC 9.1         | Potential or actual contraventions of the conditions of the approval must be reported to the Department in writing within 2 business days of the approval holder becoming aware of the actual or potential contravention  | Compliant.        | C_005_Peet_EPBC 2013 7048 - Publication of Revegetation Management Plan_12032015.<br>C_006_DotE_Peet Mandurah Syndicate - Reported Breach of Conditions attached to EPBC 2013 7048_01042015.<br>C_008_Strategen_Lakelands Compliance_11032015. | Correspondence was provided to DotE regarding the potential non-compliance with item EPBC 13.1 (C_005). Peet became aware of the potential breach on 11 March 2015 (C_008) and reported it to DotE on 12 March 2015, within two days as required. |
| EPBC 10.1        | Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister.  | Not applicable.   | Management advice 22 March 2017.   | An independent audit has not been requested by the Minister.  |
| EPBC 10.2        | The independent auditor must be approved by the Minister prior to the commencement of the audit.  | Not applicable.   | Not applicable.  | Refer to EPBC 10.1.   |
| EPBC 10.3        | Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.  | Not applicable.   | Not applicable.  | Refer to EPBC 10.1.   |
| EPBC 11.1        | 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.                                   | Not applicable.   | Management advice 22 March 2017.   | Peet advised it has not wished to carry out any activity otherwise than in accordance with the RMP to date. No revisions to the approved RMP have been proposed.  |
| EPBC 11.2        | 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.  | Not applicable.   | Not applicable.  | Refer to EPBC 11.1.   |
| EPBC 11.3        | If the Minister approves the revised RMP, that RMP must be implemented in place of the RMP previously approved.   | Not applicable.   | Not applicable.  | Refer to EPBC 11.1.   |
| EPBC 12.1        | If the Minister believes that it is necessary or convenient for the better protection of listed threatened species and communities to do so, the Minister may request that the approval holder make specified revisions to the RMP  | Not applicable.   | Not applicable.  | The Minister has not requested the revision of the approved RMP.  |

| Condition Number | Condition   | Compliance status | Evidence  | Comments  |
|------------------|---|-------------------|---|---|
|                  | specified in the conditions and submit the revised RMP for the Minister's written approval. The approval holder must comply with any such request.  |                   |   |   |
| EPBC 12.2        | The revised approved RMP must be implemented. Unless the Minister has approved the revised RMP, then the approval holder must continue to implement the RMP previously approved, as specified in the conditions.  | Not applicable.   | Not applicable.   | Refer to EPBC 12.1.   |
| EPBC 13.1        | 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. | Compliant         | R_010_Strategen_Lakelands East Annual Compliance Report_11032016.<br>W_015_ <a href="http://lakelandsestate.com.au/Lakelands/media/PDF-s/Revegetative-Management-Plan-PEE13082_01-R005-Rev-5-(2).pdf">http://lakelandsestate.com.au/Lakelands/media/PDF-s/Revegetative-Management-Plan-PEE13082_01-R005-Rev-5-(2).pdf</a> _26042017 | The RMP was first published on the website on 12 March 2015 (R_010) and the RMP remains available on the website (W_015). |

## 5. References

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

**Appendix 1**  
**Audit of implementation of**  
**Revegetation Management Plan**



Revegetation Management Plan audit table

| Reference | Condition   | Timing               | Conformance status | Evidence   | Comments  |
|-----------|---|----------------------|--------------------|--|---|
| RMP 1     | <b>Section 3.1 Revegetation objectives and scope</b><br>Revegetation will occur within two specified areas (revegetation areas and landscaping areas in the offset site) as displayed in Figure 1.  | During revegetation. | Conformant.        | Management advice 22 March 2017.<br>Site inspection 22 March 2017.   | Revegetation planting commenced in the area specified in 2016.<br>Landscaping works involving revegetation had yet to commence in the audit period.   |
| RMP 2     | <b>Section 3.1 Revegetation objectives and scope</b><br>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 item 7.     | Conformant.        | Management advice 22 March 2017.<br>Site inspection 22 March 2017.<br>R_007_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_05042017<br>R_009_Workpower_2015/16 Seed Collection & Seedling Summary Report Black Swan Lake_00002016.<br>IMG_5477, IMG_5483, IMG_5485 | Revegetation using 6200 breeding and foraging species as defined in the EPBC 2013/7048 approval occurred in 2016 (R_009), including: <ul style="list-style-type: none"> <li>• 4200 breeding species</li> <li>• 1600 foraging species.</li> </ul>  |
| RMP 3     | <b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b><br>No weed species (i.e. species alien to Western Australia) within a one metre radius of the stems of the planted seedlings.  | At completion.       | Not applicable.    | Site inspection 22 March 2017.<br>R_007_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_05042017.<br>R_018_Workpower_Invoice ES10260_26022016.<br>R_019_Strategen_Pre-plant weed control_27042016.<br>IMG_5476, IMG_5478, IMG_5480, , IMG_5489                      | A high level of weed control was observed during the site inspection. Some scattered summer weeds were present; however, the overall control was excellent. Mulch had been spread over the site, which should help suppress weeds in addition to any chemical controls. Records indicate weed control was undertaken in February (R_018), Winter (R_019) and September, October and December 2016 (R_007). The auditors note weed control was also undertaken in March 2017 (outside the audit period). |
| RMP 4     | <b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b><br>Implement contingency measures as outlined in section 6 if grazing is observed on planted seedlings.  | Refer to item 51–57. | Not applicable.    | Management advice 22 March 2017.<br>Site inspection 22 March 2017.   | No significant grazing was reported or observed.  |

| Reference | Condition  | Timing  | Conformance status      | Evidence  | Comments  |
|-----------|--|---|-------------------------|---|---|
| RMP 5     | <p><b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b></p> <p>Establish local provenance species as detailed in Table 6 through seedling planting.</p> <p><b>Table 6:</b><br/> <i>Acacia saligna, Allocasuarina fraseriana, Banksia attenuata, Banksia baxteri, Banksia coccinea, Banksia hookeriana, Banksia nivea, Banksia sessilis, Corymbia calophylla, Corymbia ficifolia, Eremophila glabra, Eucalyptus marginata, Eucalyptus gomphocephala, Eucalyptus preissiana, Eucalyptus rudis, Grevillea bipinnatifida, Grevillea paniculata, Grevillea wilsonii, Hakea amplexicaulis.</i></p> | At completion.  | Not applicable.         | R_009_Workpower_2015/16 Seed Collection & Seedling Summary Report Black Swan Lake_00002016.   | Seed collected in 2012-2015, used for the project, has come from local provenance (R_009). Eleven species have been collected, with two ( <i>Euc. todiana</i> and <i>Calothamnus quadrifidus</i> ) not on the Table 6 list – however, these two have not been propagated, only stored for future use if required. |
| RMP 6     | <p><b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b></p> <p>Ensure management actions as detailed in section 4 are complied with.</p>   | Refer to item 17–23.  | Not applicable.         | Refer to item 17–23.  | Refer to item 17–23.  |
| RMP 7     | <p><b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b></p> <p>Plant a minimum of 6200 tree or shrub plants, including no less than 3000 plants that are potential breeding species and no less than 3200 plants that are foraging species of local within the 10.8 ha offset site.</p>  | At completion.  | Conformant.             | Refer to RMP 2.   | Refer to RMP 2.   |
| RMP 8     | <p><b>Table 2: Completion criteria and indicators for revegetation objectives for the revegetation site</b></p> <p>Achieved 80% survival of planted potential breeding species and 80% survival of planted foraging species within the offset site ten years from the planting completion date.</p>  | At completion.  | Not applicable.         | R_007_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_05042017.  | According the records supplied (R_007), the 2016 round of planting was completed on 30 July 2016. If 2016 was the final round of planting then criteria not required to be achieved until 30 July 2026.   |
| RMP 9     | <p><b>Section 4.1.1 Revegetation areas</b></p> <p>Seedlings will be propagated in an accredited nursery from seed collected from within a 50 km radius of the revegetation site. This radius may need to be extended if the relevant local government have restrictions on seed collection at the time seed collection is required.</p>  | Prior to revegetation activities taking place.                                      | Conformant              | R_008_NIASA_Nursery Industry Accreditation Scheme, Australia Workpower Wholesale Nursery_00122016.<br>R_009_Workpower_2015/16 Seed Collection & Seedling Summary Report Black Swan Lake_00002016. | Seed collected in 2012-2015, used for the project, has come from local provenance collected within a 50 km radius of the revegetation site. (R_009). Accreditation certificate of nursery provided (R_008).   |
| RMP 10    | <p><b>Table 3: Management actions (revegetation areas)</b></p> <p>Undertake a site inspection to identify the weed species, locations and abundance within revegetation areas.</p>   | Prior to revegetation activities taking place.                                      | Conformant (completed). | R_010_Strategen_Lakelands East Annual Compliance Report_11032016.   | A site inspection of the revegetation areas was undertaken in 2015 (R_010).   |
| RMP 11    | <p><b>Table 3: Management actions (revegetation areas)</b></p> <p>Undertake weed control (as described in section 4.1.2) at the revegetation areas based on the results of the site inspection at least twice prior to commencing revegetation activities.</p>   | Prior to seedling planting taking place in accordance with chemical specifications. | Conformant.             | Refer to RMP 3.   | Refer to RMP 3.<br><br>Note: item refers to section 4.1.2. This appears to be a typo and should be read as section 4.2 of RMP.  |



| Reference | Condition  | Timing  | Conformance status | Evidence  | Comments  |
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| RMP 12    | <b>Table 3: Management actions (revegetation areas)</b><br>Undertake seedling planting as described in Section 4.3.  | After the completion of initial weed control.                                       | Conformant.        | Refer to RMP 2.   | Refer to RMP 2.   |
| RMP 13    | <b>Table 3: Management actions (revegetation areas)</b><br>Install a minimum of three stakes and a protective guard around each seedling to provide micro-climate control and protect the vegetation from grazing by feral and native herbivorous animals (i.e. rabbits and kangaroos) and wind damage.                    | After seedling planting.  | Conformant.        | Site inspection 22 March 2017.<br>R_007_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_05042017<br>IMG_5476, IMG_5480, IMG_5478   | Tree guards with 3 stakes have been installed for each seedling.  |
| RMP 14    | <b>Table 3: Management actions (revegetation areas)</b><br>Ensure all plants and other materials used in revegetation are free of dieback and weeds.   | Prior to revegetation activities taking place.                                      | Conformant.        | Refer to RMP 9.   | Refer to RMP 9.   |
| RMP 15    | <b>Table 3: Management actions (revegetation areas)</b><br>Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering revegetation areas.   | At all times.   | Conformant.        | R_017_Workpower_Workpower Environmental's Cleaning and Sterilisation Guidelines for the Prevention of Dieback_00000000.<br>R_007_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_05042017. | Weed contractor's hygiene procedure and hygiene register provided, indicating hygiene measures have been undertaken.        |
| RMP 16    | <b>Section 4.1.2 Landscaping area</b><br>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.    | Refer to RMP 9.<br>Management advice 22 March 2017.<br>Site inspection 22 March 2017.   | Refer to RMP 9 – provenance seed collected.<br>Revegetation activities in landscaping areas are scheduled to occur in 2017. |
| RMP 17    | <b>Table 4: Management actions (landscaping areas in the offset site)</b><br>Undertake a site inspection to identify the weed species, locations and abundance within the landscaping areas.   | Prior to revegetation activities taking place.                                      | Not applicable.    | Refer to RMP 16.  | Refer to RMP 16.<br>Revegetation activities in landscaping areas are scheduled to occur in 2017.                            |
| RMP 18    | <b>Table 4: Management actions (landscaping areas in the offset site)</b><br>Undertake weed control (as described in section 4.1.2) at the landscaping areas based on the results of the site inspection at least twice prior to commencing revegetation activities.   | Prior to seedling planting taking place in accordance with chemical specifications. | Not applicable.    | Refer to RMP 16.  | Refer to RMP 16.<br>Revegetation activities in landscaping areas are scheduled to occur in 2017.                            |

| Reference | Condition  | Timing   | Conformance status | Evidence                   | Comments   |
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| RMP 19    | <b>Table 4: Management actions (landscaping areas in the offset site)</b><br>Undertake ongoing maintenance weed control as described in section 4.1.2.   | Biannually (as necessary) until responsibility of managing the revegetation site is transferred to City of Mandurah. | Not applicable.    | Refer to RMP 16            | Refer to RMP 16.<br>Revegetation activities in landscaping areas are scheduled to occur in 2017.             |
| RMP 20    | <b>Table 4: Management actions (landscaping areas in the offset site)</b><br>Undertake seedling planting as described in Section 4.3.  | After the completion of initial weed control.  | Not applicable.    | Refer to RMP 16.           | Refer to RMP 16.<br>Revegetation activities in landscaping areas are scheduled to occur in 2017.             |
| RMP 21    | <b>Table 4: Management actions (landscaping areas in the offset site)</b><br>Install a minimum of three stakes and a protective guard around each seedling to provide micro-climate control and protect the vegetation from grazing by feral and native herbivorous animals (i.e. rabbits and kangaroos) and wind damage.                              | After seedling planting.   | Not applicable.    | Refer to RMP 16.           | Refer to RMP 16.<br>Revegetation activities in landscaping areas are scheduled to occur in 2017.             |
| RMP 22    | <b>Table 4: Management actions (landscaping areas in the offset site)</b><br>Ensure all plants and other materials used in revegetation are free of dieback and weeds.   | Prior to revegetation activities taking place.   | Not applicable.    | Refer to RMP 16.           | Refer to RMP 16.<br>Revegetation activities in landscaping areas are scheduled to occur in 2017.             |
| RMP 23    | <b>Table 4: Management actions (landscaping areas in the offset site)</b><br>Ensure vehicles, machinery, equipment and footwear are free of mud and soil when entering landscaping areas.  | At all times.  | Not applicable.    | Refer to RMP 16.           | Refer to RMP 16.<br>Revegetation activities in landscaping areas are scheduled to occur in 2017.             |
| RMP 24    | <b>Section 4.2</b><br>Weed control techniques will comprise of chemical controls identified in Table 5<br><b>Table 5:</b><br><ul style="list-style-type: none"> <li>• Initial broad scale spray herbicide application (using towed boom spray rigs).</li> <li>• Spot spray herbicide application.</li> <li>• Stem injection, cut and paint.</li> </ul> | At all times.  | Conformant.        | Refer to RMP 3 and RMP 16. | Refer to RMP 3 and RMP 16.<br>Conformant for revegetation area, activities in landscaping area yet to occur. |
| RMP 25    | <b>Section 4.2</b><br>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.   | Conformant.        | Refer to RMP 3.            | Refer to RMP 3.  |
| RMP 26    | <b>Section 4.2</b><br>Follow up weed control activities will be in the form of spot spraying around planted seedlings. Weed control post planting will be focussed on the immediate areas surrounding planted seedlings (e.g. 1 m radius around planted seedlings).  | After seedling planting.   | Conformant.        | Refer to RMP 3.            | Refer to RMP 3.  |
| RMP 27    | <b>Section 4.2</b><br>Weed control will be undertaken by Peet until handover of management to the site to the City of Mandurah.  | Until handover of management to the site to the City of Mandurah.  | Conformant.        | Refer to RMP 3.            | Refer to RMP 3.<br>Weed control has been undertaken by Peet to date.   |

| Reference | Condition  | Timing   | Conformance status         | Evidence   | Comments   |
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| RMP 28    | <b>Section 4.3</b><br>Plants used in revegetation activities will be propagated from native seed collected from the local area. Seed will be collected from a 50 km radius from the revegetation site by licensed seed collectors.   | Refer to RMP 9.  | Conformant.                | Refer to RMP 5 and RMP 9.  | Refer to RMP 5 and RMP 9.  |
| RMP 29    | <b>Section 4.3</b><br>Only species defined within EPBC 2013/7048 as potential breeding or foraging species for black cockatoos (Tuart, Marri, Jarrah, <i>Acacia saligna</i> , <i>Banksia attenuata</i> , <i>Banksia grandis</i> , <i>Banksia menziesii</i> and <i>Allocasuarina fraseriana</i> species) will be considered as part of the 6200 plants that are required to be planted. | At all times.  | Not applicable.            | R_009_Workpower_2015/16 Seed Collection & Seedling Summary Report Black Swan Lake_00002016.                  | The species of all the 6200 seedlings planted to date are as per the defined list.   |
| RMP 30    | <b>Section 4.3</b><br>Seed collection will be undertaken in late-spring to summer of the year preceding planting activities.   | Late-spring to summer of the year preceding planting activities. | Conformant (completed).    | R_010_Strategen_Lakelands East Annual Compliance Report_11032016.  | This obligation was reported as conformant in the previous ACR (R_010).  |
| RMP 31    | <b>Section 4.3</b><br>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.  | Not applicable.            | Refer to RMP 2.  | This action is taken to be a note.   |
| RMP 32    | <b>Section 4.3</b><br>Seedling planting will be undertaken in early winter, within one month of the first rains.   | Early winter, within one month of the first rains.               | Potential non-conformance. | R_007_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_05042017. | Records indicate seedling planting commenced 13 July 2016 (R_007).<br><br>Bureau of Meteorology records for Mandurah indicate rainfall commenced in autumn 2016, with the most of the remainder of the year experiencing frequent rainy days.<br><br>Given the timing of planting and rainfall, this item may be found to be potentially non-conformant; however, the auditors stress this is a technical finding only – no materially adverse outcome is expected and the actual timing of planting may have been better than stipulated due to the conditions at the time. |
| RMP 33    | <b>Section 4.3</b><br>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.   | Not applicable.            | Refer to items 47, 48 and 51 – 57.<br>Site inspection 22 March 2017.   | Monitoring is not required until 2019. Most seedlings observed during the audit site inspection appeared to be healthy.  |

| Reference | Condition   | Timing               | Conformance status | Evidence  | Comments  |
|-----------|---|----------------------|--------------------|---|---|
| RMP 34    | <p><b>Section 4.3</b></p> <p>Seedlings (in the form of Tubestock) used for planting should be suitably mature, between 6 to 12 months to enable optimal establishment and growth.</p>   | During revegetation. | Conformant.        | <p>R_009_Workpower_2015/16 Seed Collection &amp; Seedling Summary Report Black Swan Lake_00002016.</p> <p>R_010_Strategen_Lakelands East Annual Compliance Report_11032016.</p> <p>Site inspection 22 March 2017.</p> | The previous ACR indicated seedlings were being propagated by February 2016 (i.e. had been sown before then), as planting occurred in July 2016 this indicates the seedlings were approximately 6 months old or more. |
| RMP 35    | <p><b>Section 4.3</b></p> <p>Tubestock should also not be root bound and planting should be undertaken as follows:</p> <ul style="list-style-type: none"> <li>• 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)</li> <li>• seedling should be planted so that the stem is vertical and the base of the plant is slightly below the original soil surface</li> <li>• soil surrounding the seedling root ball should be pressed in firmly to avoid air pockets</li> <li>• 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.</li> </ul> | During revegetation. | Conformant.        | <p>R_009_Workpower_2015/16 Seed Collection &amp; Seedling Summary Report Black Swan Lake_00002016.</p> <p>Site inspection 22 March 2017.</p>  | The available evidence indicates the listed properties were likely to have been met.  |
| RMP 36    | <p><b>Section 4.3</b></p> <p>If during monitoring plant stress is observed a wetting agent or additional watering options will be investigated as described in Table 10.</p>  | Refer to item 55.    | Conformant.        | <p>Refer to items 47, 48</p> <p>Site inspection 22 March 2017.</p>  | No indication of water stress.  |
| RMP 37    | <p><b>Section 4.3</b></p> <p>If monitoring determines that revegetation requires supplementary seedling planting in subsequent years, this will be undertaken prior to the main winter rainfall, within one month of the first rains and following the required soil preparation and weed treatment as described in Table 10.</p>   | Refer to item 52.    | Not applicable.    | <p>Refer to items 47, 48</p>  | Monitoring is not required until 2019.  |
| RMP 38    | <p><b>Section 4.4</b></p> <p>Tree guards are to be installed around planted seedlings which will provide protection from browsing animals.</p>  | Refer to item 35.    | Conformant.        | <p>Site inspection 22 March 2017.</p> <p>R_007_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_05042017.</p>   | Tree guards have been installed.  |

| Reference | Condition  | Timing   | Conformance status         | Evidence  | Comments   |
|-----------|--|--|----------------------------|---|--|
| RMP 39    | <p><b>Section 4.5 Hygiene measures</b></p> <p>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.</p>  | Prior to revegetation activities taking place. | Conformant.                | R_008_NIASA_Nursery Industry Accreditation Scheme, Australia Workpower Wholesale Nursery_00122016.<br>R_010_Strategen_Lakelands East Annual Compliance Report_11032016. | As reported in the previous ACR, seedlings were grown at an accredited nursery (R_008, R_010).   |
| RMP 40    | <p><b>Section 4.5 Hygiene measures</b></p> <p>Vehicles, machinery, equipment and footwear will also be free of mud and soil when entering the offset site.</p>   | During revegetation.                           | Conformant.                | R_007_Workpower_Black Swan Lake Lakeland East Revegetation area pre-start hygiene inspection check_05042017.  | The revegetation consultant maintains a hygiene register indicating this requirement has been met.   |
| RMP 41    | <p><b>Section 4.7 Conservation mechanism</b></p> <p>A conservation covenant under one of the following legislative mechanisms will be applied over the offset site by 31 January 2017:</p> <ul style="list-style-type: none"> <li>• Transfer of Land Act 1893</li> <li>• Soil and Land Conservation Act 1945</li> <li>• National Trust of Australia (WA) Act 1964.</li> </ul>  | By 31 January 2017.                            | Potential non-conformance. | Management advice 22 March 2017.  | Peet advised the covenant documentation remained in preparation at the end of the audit period and that they aim to complete the process in the 2017-18 audit period. The auditors do not expect the objectives of the RMP to be compromised by the delay. |
| RMP 42    | <p><b>Section 5.1.1 Revegetation areas</b></p> <p>Monitoring plots will be established within revegetation areas to enable monitoring data to be collected. Six 10 m by 10 m monitoring plots will be set up within revegetation areas taking into consideration species type, topography etc.</p>   | Every three years.                             | Not applicable.            | N/A   | Monitoring to commence in Spring 2019.   |
| RMP 43    | <p><b>Section 5.1.1 Revegetation areas</b></p> <p>Each plot will be divided into five 1 m x 1 m quadrats based on a method provided by Dr Eleanor Bennett (Bennett E [Bennett Environmental Consulting Pty Ltd] 2012, pers. comm. 10 September).</p>   | Every three years.                             | Not applicable.            | Refer to RMP 42.  | Refer to RMP 42.   |
| RMP 44    | <p><b>Section 5.1.1 Revegetation areas</b></p> <p>Data will be collected from each of the five 1 m x 1 m quadrats, in order to enable collection of representative data from each quadrat. Data collected from each quadrat will include:</p> <ul style="list-style-type: none"> <li>• flora species composition</li> <li>• vegetation structure</li> <li>• density of flora species.</li> </ul> <p>Numbers of trees will be recorded from the entire 10 m by 10 m monitoring plot to obtain an appropriate representative sample.</p> | Every three years.                             | Not applicable.            | Refer to RMP 42.  | Refer to RMP 42.   |
| RMP 45    | <p><b>Section 5.1.1 Revegetation areas</b></p> <p>Each plot will be monitored every three years during spring (commencing in spring 2019) as per Table 8 until handover (anticipated to be handed over to CoM in 2026).</p>  | Every three years.                             | Not applicable.            | Refer to RMP 42.  | Refer to RMP 42.   |

| Reference | Condition  | Timing                              | Conformance status | Evidence                                   | Comments  |
|-----------|--|-------------------------------------|--------------------|--|---|
| RMP 46    | <p><b>Section 5.1.2 Landscaping areas</b></p> <p>Landscaping areas within the offset site will be monitored at the same time as revegetation areas. Monitoring within landscaping areas will comprise of a visual observation of plant health. Any occurrences of the following will be recorded:</p> <ul style="list-style-type: none"> <li>• plant stress</li> <li>• plant mortality</li> <li>• weed species.</li> </ul> | Every three years.                  | Not applicable.    | Refer to RMP 16 and RMP 42.                | Revegetation activities in landscaping areas are scheduled to occur in 2017. Monitoring not required until Spring 2019. |
| RMP 47    | <p><b>Table 9: Monitoring program for revegetation and landscaping areas within the offset site</b></p> <p>Opportunistic observation during monitoring:</p> <p>a. Plant health (i.e. evidence of water stress, pests, animal grazing).</p>   | 3 yearly.                           | Not applicable.    | Refer to RMP 16 and RMP 42.                | Refer to RMP 16 and RMP 42.   |
| RMP 48    | <p><b>Table 9: Monitoring program for revegetation and landscaping areas within the offset site</b></p> <p>Monitoring of quadrats.</p> <p>a. Plant density</p> <p>b. Species richness</p> <p>c. Plant health (i.e. evidence of water stress, pests, animal grazing).</p>   | 3 yearly.                           | Not applicable.    | Refer to RMP 16 and RMP 42.                | Refer to RMP 16 and RMP 42.   |
| RMP 49    | <p><b>Table 9: Monitoring program for revegetation and landscaping areas within the offset site</b></p> <p>Observation during monitoring.</p> <p>a. Weed species.</p>  | Annually until handover to the CoM. | Not applicable.    | Refer to RMP 16 and RMP 42.                | Refer to RMP 16 and RMP 42.   |
| RMP 50    | <p><b>Section 6: Contingency measures</b></p> <p>Contingency actions will be initiated if monitoring indicates that management actions detailed for revegetation areas (Table 3) and landscaping areas within the offset site (Figure 3) have not been successful or effective and/or completion criteria are not being achieved (Table 10).</p>   | Every three years.                  | Not applicable.    | Refer to RMP 8, RMP 16, RMP 42 and RMP 46. | Refer to RMP 8, RMP 16, RMP 42 and RMP 46.  |
| RMP 51    | <p><b>Section 6: Contingency measures</b></p> <p>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.</p>   | As required.                        | Not applicable.    | Refer to RMP 8, RMP 16, RMP 42 and RMP 46. | Refer to RMP 8, RMP 16, RMP 42 and RMP 46.  |

| Reference | Condition   | Timing       | Conformance status | Evidence                                   | Comments                                   |
|-----------|---|--------------|--------------------|--|--|
| RMP 52    | <p>If any of the 3 yearly assessment reports determine that survival rates of planted potential breeding species or planted foraging species are below 80 percent.</p> <ol style="list-style-type: none"> <li>Identify cause.</li> <li>Implement approach to remedy cause which could include: <ul style="list-style-type: none"> <li>collecting additional provenance seed for plant propagation to compensate for the insufficient native plant species richness and/or cover</li> <li>undertaking infill seedling planting within 12 months of the date of survey</li> <li>application of additives such as Seasol, water granules, soil breaker, water retainer, wetting agent or fertiliser tablets as deemed necessary by revegetation contractor.</li> <li>further weed and/or pest control if required post infill planting.</li> </ul> </li> <li>Monitor success of contingency measure(s).</li> </ol> | As required. | Not applicable.    | Refer to RMP 8, RMP 16, RMP 42 and RMP 46. | Refer to RMP 8, RMP 16, RMP 42 and RMP 46. |
| RMP 53    | <p>Approximately 20% of seedlings planted show evidence of damage by animal (i.e. grazing).</p> <ol style="list-style-type: none"> <li>Implement measures to prevent further damage which could include: <ul style="list-style-type: none"> <li>animal control program</li> <li>installation of temporary fencing</li> <li>application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required</li> <li>applying wetting agent or supplementary watering</li> <li>removing damaged plants and replanting</li> <li>providing alternate species suitable to the site and provenance requirements.</li> </ul> </li> <li>Monitor success of contingency measure(s).</li> </ol>   | As required. | Not applicable.    | Refer to RMP 8, RMP 16, RMP 42 and RMP 46. | Refer to RMP 8, RMP 16, RMP 42 and RMP 46. |
| RMP 54    | <p>Approximately 20% of seedlings planted show evidence of damage by pests.</p> <ol style="list-style-type: none"> <li>Implement measures to prevent further damage which could include: <ul style="list-style-type: none"> <li>animal control program</li> <li>installation of temporary fencing</li> <li>application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required</li> <li>applying wetting agent or supplementary watering</li> <li>removing damaged plants and replanting</li> <li>providing alternate species suitable to the site and provenance requirements.</li> </ul> </li> <li>Monitor success of contingency measure(s).</li> </ol>   | As required. | Not applicable.    | Refer to RMP 8, RMP 16, RMP 42 and RMP 46. | Refer to RMP 8, RMP 16, RMP 42 and RMP 46. |

| Reference | Condition  | Timing  | Conformance status | Evidence                                      | Comments  |
|-----------|--|---|--------------------|---|---|
| RMP 55    | <p>Approximately 20% of seedlings planted show evidence of water stress.</p> <ol style="list-style-type: none"> <li>Implement measures to prevent further damage which could include: <ul style="list-style-type: none"> <li>animal control program</li> <li>installation of temporary fencing</li> <li>application of pesticides in consultation with the CoM and Department of Parks and Wildlife (Parks and Wildlife) if required</li> <li>applying wetting agent or supplementary watering</li> <li>removing damaged plants and replanting</li> <li>providing alternate species suitable to the site and provenance requirements.</li> </ul> </li> <li>Monitor success of contingency measure(s).</li> </ol> | As required.  | Not applicable.    | Refer to RMP 8, RMP 16, RMP 42 and RMP 46.    | Refer to RMP 8, RMP 16, RMP 42 and RMP 46.  |
| RMP 56    | <p>Weeds are within a one metre radius of the stem of the seedling.</p> <ol style="list-style-type: none"> <li>Investigate cause (e.g. adjacent sources of weed seed).</li> <li>Implement measures to remove weeds (e.g. weed control) as practicable.</li> <li>Monitor success of contingency measure(s).</li> </ol>  | As required.  | Not applicable.    | Refer to RMP 8, RMP 16, RMP 42 and RMP 46.    | Refer to RMP 8, RMP 16, RMP 42 and RMP 46.  |
| RMP 57    | <p>Unauthorised access (people and vehicles).</p> <ol style="list-style-type: none"> <li>Implement measures to prevent further unauthorised access (e.g. installation of temporary fencing and signage), as practicable.</li> <li>Monitor success of contingency measure(s).</li> </ol>  | As required.  | Not applicable     | Refer to RMP 8, RMP 16, RMP 42 and RMP 46.    | Refer to RMP 8, RMP 16, RMP 42 and RMP 46.  |
| RMP 58    | <p><b>Section 7 Plan implementation</b><br/>This RMP will be implemented by Peet until responsibility of the revegetation site is transferred to the City of Mandurah (CoM).</p>   | Until responsibility of the revegetation site is transferred to the City of Mandurah. | Conformant.        | Management advice 22 March 2017.              | Peet remains responsible for the revegetation areas.  |
| RMP 59    | <p><b>Section 7 Plan implementation</b><br/>The revegetation site will be vested as Crown Reserve designated as Public Open Space (POS), with management vested to the City of Mandurah under Section 152 of the <i>Planning and Development Act 2005</i>.</p>   | At handover.  | Not applicable.    | Refer RMP 58.                                 | Refer RMP 58.   |
| RMP 60    | <p><b>Section 7.1 Roles and responsibilities</b><br/>All contractors and staff will be required to operate in accordance with this RMP.</p>  | At all times.   | Conformant.        | Refer to RMP 1 to RMP 60.<br>Refer to RMP 32. | One relevant technical potential non-conformance (RMP 32) has been identified under this audit. Given the highly technical nature of the finding, the auditors consider contractors have demonstrated overall conformance with the requirements of RMP. |



**Appendix 2**  
**Evidence register**



| Code  | Reference  | Author/<br>Organisation | Version | Topic /notes  | File name   |
|-------|--|-------------------------|---------|---|---|
| C_001 | C_001_Peet_EPBC<br>Conditions_28032017   | Jaymi Davies /<br>Peet  |         | Stage 66 clearing May-June<br>2016 aerial images<br>ACR on website        | EPBC Conditions   |
| D_002 | D_002_Workpower_Nursery Tally<br>2017_00002017   | Workpower               |         | Nursery Tally 2017  | nurdery tally   |
| G_003 | G_003_EPCAD_Lakelands Eastern<br>Precinct Black Swan Lake Landscape &<br>Irrigation Works_00042016   | EPCAD                   |         | Black Swan Lake Landscape<br>& Irrigation Works                           | plantingmap   |
| P_004 | P_004_Black Swan Lake<br>planting1_21072016  |                         |         | Black Swan Lake planting  | IMG_0076  |
| P_005 | P_005_Black Swan Lake<br>planting2_21072016  |                         |         | Black Swan Lake planting  | IMG_0082  |
| P_006 | P_006_Black Swan Lake<br>planting_00000000   |                         |         | Black Swan Lake planting  | IMG_0889  |
| R_007 | R_007_Workpower_Black Swan Lake<br>Lakeland East Revegetation area pre-<br>start hygiene inspection<br>check_05042017  | Workpower               |         | pre-start hygiene inspection<br>check                                     | PrestartHygieneInspection                                     |
| R_008 | R_008_NIASA_Nursery Industry<br>Accreditation Scheme, Australia<br>Workpower Wholesale<br>Nursery_00122016   | NIASA                   |         | NIASA accreditation<br>Workpower Wholesale nursery                        | NIASA certificate Dec 2016_workpower<br>wholesale nursery     |
| R_009 | R_009_Workpower_2015/16 Seed<br>Collection & Seedling Summary Report<br>Black Swan Lake_00002016   | Workpower               |         | Seed Collection & Seedling<br>Summary Report Black Swan<br>Lake           | SummaryReport   |
| R_010 | R_010_Strategen_Lakelands East<br>Annual Compliance Report_11032016  | Strategen               | Rev 0   | Annual Compliance Report<br>2016  | PEE13082_01 R008 Rev 0  |
| R_011 | R_011_MNG_Lakelands East Extent of<br>Cleared Areas_04072016   | MNG                     |         | Extent of cleared areas 30<br>June 2016 (start of CBC<br>breeding season) | 95635de-094d  |
| R_012 | R_012_Strategen_Lakelands East -<br>Mandjoogoordap Drive, Mandurah<br>Significant Tree Survey<br>Results_02082016  | Strategen               |         | Significant Tree Survey   | PEE13082_01 M012 Rev A  |
| R_013 | R_013_Strategen_Feb2017_24042107   | Strategen               |         | Clearing areas - start of audit<br>period                                 | PEE13082_01_JMitchelle_Feb2017_20170424                       |
| C_014 | C_014_DEE_FW EPBC 2013/7048<br>Annual Compliance Report_30032016   | Heath Cross /<br>DEE    |         | ACR publication   | FW EPBC 2013/7048 Annual Compliance<br>Report SECUNCLASSIFIED |
| W_015 | W_015_ <a href="http://lakelandssestate.com.au/Lakelands/media/PDF-s/Revegetative-Management-Plan-PEE13082_01-R005-Rev-5-(2).pdf">http://lakelandssestate.com.au/Lakelands/media/PDF-s/Revegetative-Management-Plan-PEE13082_01-R005-Rev-5-(2).pdf</a> _26042017 | Peet                    |         | RMP on website  |   |
| C_016 | C_016_Strategen_EPBC 2013/7048 -<br>Request to vary condition_22012016   | A Welker /<br>Strategen |         | Variation to condition 11 and<br>13                                       | EPBC 2013/7048 - Request to vary condition                    |
| R_017 | R_017_Workpower_Workpower<br>Environmental's Cleaning and<br>Sterilisation Guidelines for the<br>Prevention of Dieback_00000000  | Workpower               |         | Hygiene   |   |
| R_018 | R_018_Workpower_InvooiceES10260_2<br>6022016   | Workpower               |         | Weed control  | Environmental Site ES10260                                    |
| R_019 | R_019_Strategen_Pre-plant weed<br>control_27042016   | Strategen               |         | Weed control  |   |

