

Estates Development Company
Jindee Innovation Project, Jindalee, WA
(EPBC 2013/6631) Annual Compliance Report

23 April 2021

60521/136375 (Rev 0)

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

Declaration of accuracy

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

Signed



Full name (please print)

Fiona Roche

Position (please print)

Chief Executive Officer

Organisation (please print including ABN/ACN if applicable)

7708 995 668

Date

03 / 05 / 21

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- Appendix A EPBC Approval 2012/6631
- Appendix B Conservation Management Plan Audit Findings
- Appendix C Clearing and Revegetation Management Plan Audit Findings

1. Introduction

This Annual Compliance Report (ACR) addresses the status of implementation of the 'Jindee Innovation Project' and level of compliance with the conditions in the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval 2012/6631 (EPBC 2012/6631, Appendix A) and the related environmental management plans.

This ACR summarises the results of an audit undertaken in order to assess the compliance/conformance status of approval conditions and condition management plans for the audit period 4 February 2020 to 3 February 2021.

1.1 Project background

Westminster Estates Pty Ltd entered into an agreement in 2007 with the Western Australian Planning Commission (WAPC) and the City of Wanneroo to undertake an innovative urban development, known as the Jindee Innovation Project. The Jindee Innovation Project is located approximately 37 km north of Perth and 14 km north-west of the Joondalup City Centre, Western Australia, in the City of Wanneroo (CoW).

The development is on land owned by Westminster within Lot 9002 Marmion Avenue and has approximately 800 m frontage to the Indian Ocean. The developable area covers an area of 110 ha. The project was developed in consultation with the WAPC and the Environmental Protection Authority (EPA) with an objective to maximise the biodiversity protected on site.

1.2 Environmental approval to implement the project

The Jindee Innovation Project is owned by Westminster, managed by Estates Development Company (EDC), and the proposed action was to clear native vegetation on Lot 9036 and Part Lot 3054 Marmion Avenue (now Lot 9002), Jindalee, for development of a residential estate (Figure One). The Project was referred to the Department of Agriculture, Water and the Environment ([DAWE], previously known as Department of the Environment [DotE]) on 16 November 2012 and conditionally approved under EPBC 2012/6631 on 18 July 2013, under ss 130(1) and 133 of the EPBC Act. The development was determined to be a Controlled Action due to potential for significant impacts on listed threatened species and communities (Carnaby's Black Cockatoo).

Variations to conditions of EPBC 2012/6631 have subsequently been approved by the Minister; 21 July 2014, 7 April 2016, 25 May 2016 and 26 October 2020. A consolidated notice which includes all changes to the approval is in Appendix A.

The action substantially commenced on 4 February 2015.

Figure One. Jindalee Concept Development Plan



2. Project status

Activities undertaken during the audit period (4 February 2020 to 3 February 2021) included:

- Selling of lots and ongoing construction of housing in Stage 1.
- Land clearing and construction of lots in Stage 5/Release 2 undertaken between 6 April 2020 and 30 October 2020.
- Dust monitoring during Stage 5 construction works.
- Fire break maintenance
- weed and pest inspection was undertaken in Spring 2020 in the central and eastern POS

Due to the change in lot identification numbers brought about by the transfer of ownership of the Parks and Recreation areas in May 2016, as required by condition 11, and the creation of individual residential land titles for Stage 1, the proposal site lots defined in the approval are not the same as the lots described in the Conservation Management Plan (CMP; Strategen 2016a) and Clearing and Revegetation Management Plan (CRMP; Strategen 2016b). However, the areas described in each of these documents are identical. The CMP and the CRMP, with the change of lot identification numbers, were approved by the Minister in December 2016.

3. Audit methodology

3.1 Audit plan

3.1.1 Purpose and scope

This document has been prepared for Westminster (the approval holder) to fulfil the requirements of condition 3 of EPBC 2012/6631. Condition 3 requires the approval holder to publish an annual report for the previous twelve-month period, addressing compliance with each condition of EPBC 2012/6631 (Appendix A); as follows:

‘Within three months of every 12 month anniversary of the commencement of the action, the person taking the action must publish a report on their website addressing compliance with the conditions of approval over the previous 12 months, including implementation of the management plans as specified in the conditions. Documentary evidence providing proof of the date of publication must be provided to the department at the same time the compliance report is published. The approval holder must notify the department in writing of any non-compliance with conditions of this approval no later than two business days of becoming aware of the non-compliance.’

This ACR addresses the audit period between 4 February 2020 and 3 February 2021 for the conditions of EPBC 2012/6631 and implementation of the CMP (Rev 4, Strategen 2016a) and CRMP (Rev 4, Strategen 2016b), required by conditions 10 and 12 of EPBC 2012/6631 respectively¹.

3.1.2 Methodology

The findings of the site inspection undertaken by lead environmental auditor Karen Hoefhamer on 29 March 2021 have been used to prepare this ACR. Activities during the site inspection involved consultation with James Blitz, Project Manager from EDC. A review of documentation was also undertaken to support the audit. Key persons consulted during the audit are listed in Table 3.1.

Table 3.1: Persons consulted during the audit

Person and Position	Organisation	Purpose
James Blitz (Project Manager)	Estates Development Company	To obtain verifiable evidence to assist in determining compliance with EPC 2012/6631
Steve Long (SEQ Manager)	Croker Construction	To provide evidence in relation to construction works undertaken for Stage 5 works

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. DAWE issued Annual Compliance Report Guidelines in 2014 and terminology from this guidance was applied in this audit (Table 3.2).

Table 3.2: Action implementation status

Status	Acronym	Description
Conditions of approval		
Compliant	C	Sufficient evidence is required to confirm that all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Potentially non-compliant	PNC	The requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not applicable	NA	The requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.
Management Plans		

¹ The CMP (Revision 8 dated 9 December 2020) and the CRMP (Revision 7 dated 9 December 2020) were revised during the audit period and received approval for implementation by the Department on 17 February 2021. Since the approval date falls outside of the current audit period, compliance has been assessed against Revision 4 of the CMP and CRMP for this audit.

Status	Acronym	Description
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

A total of 114 items were audited from EPBC 2012/6631, CMP and CRMP. The results of the audit of EPBC 2012/6631 conditions are shown in Table 4.1. The results of the audit of conformance with the key actions contained within the CMP and CRMP are outlined in Appendix B and Appendix C, respectively.

4.1 Compliance with EPBC conditions

Of the 27 conditions contained within EPBC 2012/6631 (Table 4.1):

- 20 were found to be 'compliant', with seven of those identified as 'compliant (completed)',
- seven were found to be 'not applicable',
- None were found to be 'potentially non-compliant'.

4.2 Conformance with the Conservation Management Plan

Of the 46 key actions identified from the CMP (Appendix B):

- 30 were found to be 'conformant', with two of those identified as 'conformant (complete)',
- 14 were found to be 'not applicable',
- two were found to be 'potentially non-conformant'.

The two actions found to be potentially non conformant were CMP 29 and CMP 30 regarding the implementation of weed control in the POS. Weed control was recommended in the Spring 2020 weed assessment survey and Stage 5 site audit, however this was not undertaken prior to the end of the audit period in February 2021 and therefore results in a non-conformance with these management actions. Preparations are currently underway to undertake weed control in both the eastern and central POS.

4.3 Conformance with the Clearing and Revegetation Management Plan

Of the 41 key actions identified from the CRMP (Appendix C):

- Seven were found to be 'conformant', with three of those identified as 'conformant (complete)',
- 34 were found to be 'not applicable',
- None were found to be 'potentially non-conformant'.

Table 4.1: Compliance with Conditions of EPBC 2012/6631 (Variation approved 26 October 2020)

Ref	Condition	Evidence	2020 Comments	Compliance Status
EPBC 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.	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Commencement of the action occurred on 4 February 2015. Item assessed as Compliant (completed) during the previous audit period (R001).	C (completed)
EPBC 2	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 management plans 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 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.	All evidence utilised to inform this ACR. Refer to other items in this table and appendices	Accurate records for all applicable conditions have been maintained and were available during the audit.	C
EPBC 3.1	Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on the website addressing compliance with the conditions of approval over the previous 12 months, including implementation of the management plans as specified in the conditions.	C001_EDC_Email to DAWE Jindee ACR 2020 submission_22042020 R001_Strategen-JBS&G_Jindee ACR 2020_09042020 W001_Jindee website_17032021	The Annual Compliance Report (ACR, R001) was prepared and published on the Jindee website on 22 April 2020 (C001), within three months of the 12 month anniversary of commencement (4 February). The 2020 ACR was available on the Jindee website and sighted by the auditor on 17 March 2021 (W001).	C
EPBC 3.2	Documentary evidence providing proof of the date of publication must be provided to the Department at the same time the compliance report is published.	C001_EDC_Email to DAWE Jindee ACR 2020 submission_22042020	Documentary evidence of publication was submitted to DEE on 22 April 2020 (C001).	C
EPBC 3.3	The approval holder must notify the Department in writing of any non-compliance with any conditions of this approval no later than two business days of becoming aware of the non-compliance.	EDC Management advice on 29 March 2021	No potential non-compliances were identified during the audit period.	C
EPBC 4.1	Upon the direction of the Minister, the person taking the action must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister.	EDC Management advice on 29 March 2021	Westminster was not directed to conduct an independent audit during the audit period.	NA
EPBC 4.2	The independent auditor must be approved by the Minister prior to the commencement of the audit.	EDC Management advice on 29 March 2021	Refer to EPBC 4.1.	NA
EPBC 4.3	Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	EDC Management advice on 29 March 2021	Refer to EPBC 4.1.	NA
EPBC 5.1	Revision of action management plans The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister under conditions 10 and 12, or as subsequently revised in accordance with these conditions, by submitting an application in	R002_Strategen-JBS&G_Jindee Conservation MP (Rev 8)_09122020	Westminster revised the Conservation Management Plan (CMP, Revision 8 R002) and the Clearing and Revegetation Management Plan (CRMP, Revision 7 R003) during the audit period. The plans were	C

Ref	Condition	Evidence	2020 Comments	Compliance Status
	accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.	R003_Strategen-JBS&G_Jindee Clearing and Reveg MP (Rev 7)_09122020 C002_Dawe_Jindee CMP CRMP approval letter_17022021 R004_Strategen_Jindee CMP Revision 4 December 2016 R005_Strategen_Jindee CRMP Revision 4 December 2016	submitted to the Department for review on 9 December 2020. Approval for the revised plans was granted by the department on 17 February 2021 (C002). As the approval of the revised management plans was outside the current audit period, compliance for this audit has been assessed against CMP (Revision 4, R004) and the CRMP (Revision 4, R005) dated December 2016.	
EPBC 5.2	5A. The approval holder may choose to revise an action management plan approved by the Minister under conditions 10 and 12, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.	R004_Strategen_Jindee CMP Revision 4 December 2016 R005_Strategen_Jindee CRMP Revision 4 December 2016 EDC Management advice on 22 March 2021	Refer to EPBC 5.1. The approved management plans: CMP Revision 4 (R004) and CRMP Revision 4 (R005) were implemented during the 2020 audit period. Evidence is documented in Appendix B for the CMP and Appendix C for the CRMP in Appendix C.	N/A
EPBC 5.3	5B. If the approval holder makes the choice under condition 5A to revise an action management plan without submitting it for approval, the approval holder must: a. notify the Department in writing that the approved action management plan has been revised and provide the Department with: i. an electronic copy of the RAMP; ii. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP; iii. an explanation of the differences between the approved action management plan and the RAMP; iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact; and v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department. b. subject to condition 5D, implement the RAMP from the RAMP implementation date.		Refer to EPBC 5.1.	N/A

Ref	Condition	Evidence	2020 Comments	Compliance Status
EPBC 5.4	5C. The approval holder may revoke its choice to implement a RAMP under condition 5A at any time by giving written notice to the Department. If the approval holder revokes the choice under condition 5A, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 5A.		Refer to EPBC 5.1.	N/A
EPBC 5.5	5D. If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact, then: <ul style="list-style-type: none"> a. condition 5A does not apply, or ceases to apply, in relation to the RAMP; and b. the approval holder must implement the action management plan specified by the Minister in the notice. 		Refer to EPBC 5.1	NA
EPBC 6	Condition 6 was revoked on 7 April 2016			
EPBC 7	Unless otherwise agreed to in writing by the Minister, the approval holder must publish the management plans referred to in these conditions of approval on the website. The management plans must be published on the website within 1 month of being approved by the Minister or being submitted under condition 5B.	R004_Strategen_Jindee CMP Revision 4 December 2016 R005_Strategen_Jindee CRMP Revision 4_December 2016 W001_Jindee website_17032021	The approved management plans (R004, R005) that were implemented during this audit period (CMP and CRMP Revision 4) were on the Jindee website sighted by the auditor on 17 March 2021 (W#001). Recommendation Jindee website should be updated to show the revised management plans (CMP Revision 8 and CRMP Revision 7) since they were approved on 17 February 2021 (just outside of this audit period).	C
EPBC 8	If, at any time after five (5) years from the date of this approval, the approval holder has not substantially commenced the action, then the approval holder must not substantially commence the action without the written agreement of the Minister.	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Refer to EPBC 1. The action substantially commenced on 4 February 2015, within five years of the date of the approval. Item assessed as Compliant (completed) during the previous audit period.	C (complete)
EPBC 9	To mitigate impacts to Carnaby's Black Cockatoo (<i>Calyptorhynchus latirostris</i>): <ul style="list-style-type: none"> a. At least 1.72 hectares of Carnaby's Black Cockatoo foraging habitat, must be retained and clearing of Carnaby's Black Cockatoo foraging habitat must not exceed 0.30 hectares within the areas shaded in green at Attachment A1; b. clearing of Carnaby's Black Cockatoo habitat in the areas shaded blue at Attachment A1 must not exceed 40.57 hectares; and c. total clearing of Carnaby's Black Cockatoo foraging habitat within areas shaded blue and areas shaded green at Attachment A1 must not exceed 43.45 hectares. 	EDC Management advice on 29 March 2021	Management advised that no clearing was undertaken in these areas during the audit period.	C
EPBC 10.1	To protect and enhance habitat for Carnaby's Black-Cockatoo, the approval holder must prepare and submit a <i>Conservation Management Plan</i> (the plan) detailing management of habitat for Carnaby's Black Cockatoo that is to be retained on the proposal site, for the Minister's approval. The plan must include:	R004_Strategen_Jindee CMP Revision 4 December 2016	The CMP (R004) was revised and re-approved by a delegate of the Minister (DEE) in December 2016 (not within this audit period) and contains the commitments specified.	C

Ref	Condition	Evidence	2020 Comments	Compliance Status
	a. measures to physically delineate areas that will be retained b. erosion and dust control measures during construction c. the management of weeds, Phytophthora dieback, bushfire and feral animals d. identification of any degraded habitat and how those areas will be managed e. a monitoring program for Carnaby's Black-Cockatoo and their habitat f. details of who will be responsible for the long-term management of the retained land, and how the land will be protected in the long-term g. a commitment to fund all management actions in the two Parks and Recreation areas within the site boundary marked in green at <u>Attachment B</u> until the management of those areas is handed over to another party, including the amount of funding that will be allocated to these management actions h. performance indicators and corrective actions i. roles and responsibilities; and j. timeframes for the implementation of the above measures.	W001_Jindee website_17032021	The approved CMP (Rev 4) was available on the EDC – Jindee website on 17 March 2021 (W001).	
EPBC 10.2	If the Minister approves the plan, the approved plan must be implemented.	Refer to Appendix B	<p>The key actions of the CMP (Revision 4) were assessed during this audit period and it was found that the CMP is being implemented.</p> <p>Of the 46 key actions:</p> <ul style="list-style-type: none"> • 32 were conformant, of those 2 were completed • 14 were not applicable at time of audit. • 2 were non-conformant at time of audit. <p>Refer to Appendix B for further details.</p> <p>The auditor has determined that the CMP is being implemented and this condition of EPBC 2012/6631 is compliant. A number of recommendations were made during the audit and are presented in Appendix B.</p>	C
EPBC 11	Within 5 years of the substantial commencement of the action, the approval holder must provide the department with written evidence that the two green areas of Parks and Recreation within the site boundary at <u>Attachment B</u> , have been granted to the City of Wanneroo for the purpose of conservation.	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	<p>EDC submitted evidence to DEE on 6 September 2016 to demonstrate the areas in Attachment B were transferred to the Western Australian Planning Commission and the Certificates of Title were issued on 20 May 2016. This has been conducted within 5 years of substantial commencement.</p> <p>Strategen (on behalf of Westminster) requested completion of the condition. A response from DEE is yet to be received.</p>	C (complete)

Ref	Condition	Evidence	2020 Comments	Compliance Status
EPBC 12.1	To mitigate impacts to Carnaby's Black Cockatoo, the approval holder must prepare and submit a Clearing and Revegetation Management Plan for the Minister's approval. The plan must include: <ol style="list-style-type: none"> a commitment to the staged collection of native seed prior to clearing from the areas shaded blue and areas shaded green at <u>Attachment A1</u>, prior to the clearing of these areas, for use in revegetation; a commitment to store native seed and either use it on-site for revegetation or transport it to a seed bank or receiving site(s) where revegetation is being undertaken by WA DPaW or another receiving party (or parties); detailed protocols for collection and use of native seed required by condition 12 (a) and 12 (b) including: <ol style="list-style-type: none"> the optimal methodology for native seed collection from the proposal site; how clearing will be staged to best harvest utilise the native seed resource for revegetation; how native seed will be stored and transported; and onsite supervision and implementation monitoring mechanisms. 	R005_Strategen_Jindee CRMP Revision 4_December 2016 W001_Jindee website_17032021	The CRMP (Rev 4, R005) was approved by a delegate of the Minister in December 2016, and contains the commitments as required. The approved CRMP was available on the Jindee website at the time of the audit (17 March 2021).	C
EPBC 12.2	The approval holder must implement the Clearing and Revegetation Management Plan approved by the Minister in writing.	Refer to Appendix C	The key actions of the CRMP were assessed during this audit period and it was found that the CRMP is being implemented. Of the 41 key actions: <ul style="list-style-type: none"> seven were conformant, of those three were completed 34 were not applicable at time of audit. Refer to Appendix C for further details.	C
EPBC 13	The person taking the action must not undertake any clearing of habitat for Carnaby's Black Cockatoo on the proposal site unless: <ol style="list-style-type: none"> the <i>Conservation Management Plan</i> required under condition 10 has been approved by the Minister; and the <i>Clearing and Revegetation Management Plan</i> required under condition 12 has been approved by the Minister. 	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Item assessed as Compliant (completed) during the previous audit period. The CMP and CRMP were initially approved by delegate of the Minister for the Environment on the 21 July 2014 prior to clearing of habitat on 4 February 2015.	C (complete)
EPBC 14.1	To offset the loss of habitat for Carnaby's Black Cockatoo, prior to the commencement of construction, the person taking the action must provide the Department with written evidence of the provision of funds to WA DPaW for the acquisition of the offset property on Lot 24, Mimegarra Road, Lancelin, WA (<u>Attachment C</u>).	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Item assessed as Compliant (completed) during a previous audit period, prior to construction commencing. Strategen, on behalf of Westminster, provided the DEE with written evidence of the provision of the required funds to WA Department of Parks and Wildlife (DPaW) (now known as Department of	C (complete)

Ref	Condition	Evidence	2020 Comments	Compliance Status
			Biodiversity, Conservation and Attractions [DBCA]) on 6 January 2015.	
EPBC 14.2	The written evidence must be accompanied with the offset attributes and shapefile.	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Item assessed as Compliant (completed) during the previous audit period.	C (complete)
EPBC 15	To offset the additional loss of habitat for Carnaby's Black Cockatoo, the approval holder must provide the Department with written evidence of the provision of funds to WA DPaw to acquire 34 hectares of Carnaby's Black Cockatoo habitat (the additional offset). The written evidence along with the offset attributes and Shapefile must be provided to the Department prior to undertaking the clearing of up to 2.88 hectares within the areas shaded green at Attachment A as specified in condition 9(a) prior to the variation made on the date this instrument was signed.	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	This condition was added to the approval on 7 April 2016. Written evidence of provision of funds to WA DPaw (now DBCA) along with offsets attributes and Shapefile were provided to DEE on 2 June 2016 prior to any clearing of 2.88 ha of Carnaby's Black Cockatoo habitat referred to condition 9(a).	C (complete)
EPBC 16	To offset the further additional loss of habitat for Carnaby's Black Cockatoo, the approval holder must provide a second additional offset comprising either: a. Legal securement in perpetuity of an offset site that: i. is a property containing no less than 40 ha of Carnaby's Black Cockatoo habitat with a habitat quality score of 8 or more out of 10 in accordance with the Environmental Offsets Policy and maintained for conservation; and ii. fully offsets the further additional loss of habitat in accordance with the Environmental Offsets Policy; and iii. has been agreed to by the Minister in writing, prior to its legal securement OR b. A provision of funds to the WA DBCA that demonstrably provides all necessary funding for the purchase of at least 40 hectares within an offset site containing no less than 40 ha of Carnaby's Black Cockatoo habitat with a habitat quality score of 8 or more out of 10 in accordance with the Environmental Offsets Policy, as agreed by the Minister in writing prior to the provision of the funds.	EDC Management advice on 29 March 2021	EDC are currently in active negotiations to seek to identify and agree on a portion of a property containing not less than 40 ha of Carnaby's Black Cockatoo habitat with a habitat quality score of 8 or more out of 10 in accordance with the Environmental Offsets Policy. Following agreement on this process, funds will then be to DBCA to enable purchase of the property.	C
EPBC 17	The approval holder must not commence works that are part of the further additional loss of habitat for Carnaby's Black Cockatoo until the approval holder has provided the second additional offset required under Condition 16.	EDC Management advice on 29 March 2021	EDC has not commenced works that are part of the further additional loss of habitat for Carnaby's Black Cockatoo. As per EPBC 16, funding is yet to be provided to DBCA for the purchase of a second offset property.	C

5. New environmental risks

Since clearing commenced for Stage 5 of the Project there have been no new environmental risks identified during the audit period, for example:

- no new pests or diseases
- no evidence that the groundwater levels have changed
- no unexpected erosion
- no new unexpected impacts from trespassers.

The two management plans defined in EPBC Approval 2012/6631 were being implemented during the audit period (Appendix B and Appendix C).

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.

Strategen-JBS&G accepts no liability for use or interpretation by any person or body other than the client who commissioned the works. This report should not be reproduced without prior approval by the client, or amended in any way without prior approval by Strategen-JBS&G, and should not be relied upon by other parties, who should make their own enquiries.

7. References

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

Strategen 2016a, *Jindee Innovation Project Conservation Management Plan* (Rev 4), prepared for Westminster Estates Pty Ltd by Strategen, December 2016

Strategen 2016b, *Jindee Innovation Project Clearing and Revegetation Management Plan* (Rev 4), prepared for Westminster Estates Pty Ltd by Strategen, December 2016

Appendix A EPBC Approval 2012/6631



VARIATION OF CONDITIONS ATTACHED TO APPROVAL

Jindee Innovation Project, Jindalee, WA (EPBC 2012/6631)

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

Approved action

Person to whom the approval is granted

Westminster Estates Pty Ltd

ABN: 48 008 675 081

Approved action

To clear native vegetation on Lot 9036 and Part Lot 3054 Marmion Avenue, Jindalee, WA, for development of a residential estate [See EPBC Act referral 2012/6631].

Variation

Variation of conditions attached to approval

The variation is:

Delete conditions 3, 5, 5A, 5B, 5C, 7, 9, 12 and 15 and the definition of New or increased impact attached to the approval and substitute with the conditions and definitions specified in the table below

Revoke the definition of Primary feeding plants attached to the approval

Add new conditions 5D, 5E, 16 and 17 specified in the table below

Add new definitions of Business day, Environmental Offsets Policy, Legal securement, Further additional loss of habitat and WA DBCA as specified in the table below

Add new Attachment A1 as specified in the table below

Date of effect

This variation has effect on the date the instrument is signed

Person authorised to make decision

Name and position

Declan O'Connor-Cox
Assistant Secretary A/g
Assessments (Vic, Tas) and Post Approvals Branch

Signature**Date of decision**

26 October 2020

Date of decision	Conditions attached to approval
Original dated 18/7/2013	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 .
Original dated 18/7/2013	2. 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 management plans 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 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.
As varied on the date this instrument was signed	3. Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on the website addressing compliance with the conditions of approval over the previous 12 months, including implementation of the management plans as specified in the conditions. Documentary evidence providing proof of the date of publication must be provided to the Department at the same time the compliance report is published. The approval holder must notify the Department in writing of any non-compliance with any conditions of this approval no later than two business days of becoming aware of the non-compliance.
Original dated 18/7/2013	4. Upon the direction of the Minister , the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister . The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister .
As varied on the date this instrument was signed	Revision of action management plans 5. The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister under conditions 10 and 12, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act . If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.
As varied on the date this instrument was signed	5A. The approval holder may choose to revise an action management plan approved by the Minister under conditions 10 and 12, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act , if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact .
As varied on the date this instrument was signed	5B. If the approval holder makes the choice under condition 5A to revise an action management plan without submitting it for approval, the approval holder must: <ul style="list-style-type: none"> (a) notify the Department in writing that the approved action management plan has been revised and provide the Department with: <ul style="list-style-type: none"> i. an electronic copy of the RAMP; ii. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP;

Date of decision	Conditions attached to approval
	<ul style="list-style-type: none"> iii. an explanation of the differences between the approved action management plan and the RAMP; iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact; and v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department. <p>(b) subject to condition 5D, implement the RAMP from the RAMP implementation date.</p>
As varied on the date this instrument was signed	5C. The approval holder may revoke its choice to implement a RAMP under condition 5A at any time by giving written notice to the Department . If the approval holder revokes the choice under condition 5A, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 5A.
As varied on the date this instrument was signed	<p>5D. If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact, then:</p> <ul style="list-style-type: none"> (a) condition 5A does not apply, or ceases to apply, in relation to the RAMP; and (b) the approval holder must implement the action management plan specified by the Minister in the notice.
As varied on the date this instrument was signed	<p>5E. At the time of giving the notice under condition 5D, the Minister may also notify that, for a specified period of time, condition 5C does not apply for one or more specified action management plans.</p> <p>Note: conditions 5A, 5B, 5C and 5D are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised action management plan, at any time, to the Minister for approval.</p>
Variation dated 7/4/2016	6. Revoked
As varied on the date this instrument was signed	7. Unless otherwise agreed to in writing by the Minister , the approval holder must publish the management plans referred to in these conditions of approval on the website . The management plans must be published on the website within 1 month of being approved by the Minister or being submitted under condition 5B.
Original dated 18/7/2013	<p>8. If, at any time after five (5) years from the date of this approval, the approval holder has not substantially commenced the action, then the approval holder must not substantially commence this action without the written agreement of the Minister.</p> <p>Note: The date in condition 8 refers to the date of the approval decision (18 July 2013).</p>
As varied on the date this instrument was signed	<p>9. To mitigate impacts to Carnaby's Black Cockatoo (<i>Calyptorhynchus latirostris</i>):</p> <ul style="list-style-type: none"> (a) At least 1.72 hectares of Carnaby's Black Cockatoo foraging habitat, must be retained and clearing of Carnaby's Black Cockatoo foraging habitat must not exceed 0.30 hectares within the areas shaded in green at <u>Attachment A1</u>;

Date of decision	Conditions attached to approval
	<p>(b) clearing of Carnaby's Black Cockatoo habitat in the areas shaded blue at <u>Attachment A1</u> must not exceed 40.57 hectares; and</p> <p>(c) total clearing of Carnaby's Black Cockatoo foraging habitat within areas shaded blue and areas shaded green at <u>Attachment A1</u> must not exceed 43.45 hectares.</p>
Variation dated 21/7/2014	<p>10. To protect and enhance habitat for Carnaby's Black Cockatoo, the approval holder must prepare and submit a <i>Conservation Management Plan</i> (the plan) detailing management of habitat for Carnaby's Black Cockatoo that is to be retained on the proposal site, for the Minister's approval. The plan must include:</p> <ul style="list-style-type: none"> (a) measures to physically delineate areas that will be retained; (b) erosion and dust control measures during construction; (c) the management of weeds, <i>Phytophthora</i> dieback, bushfire and feral animals; (d) identification of any degraded habitat and how those areas will be managed; (e) a monitoring program for Carnaby's Black Cockatoo and their habitat; (f) details of who will be responsible for the long-term management of the retained land, and how the land will be protected in the long-term; (g) a commitment to fund all management actions in the two Parks and Recreation areas within the site boundary marked in green at <u>Attachment B</u> until the management of those areas is handed over to another party, including the amount of funding that will be allocated to these management actions; (h) performance indicators and corrective actions; (i) roles and responsibilities; and (j) timeframes for the implementation of the above measures. <p>If the Minister approves the plan, the approved plan must be implemented.</p>
Original dated 18/7/2013	<p>11. Within 5 years of the substantial commencement of the action, the approval holder must provide the Department with written evidence that the two green areas of Parks and Recreation within the site boundary at <u>Attachment B</u>, have been granted to the City of Wanneroo for the purpose of conservation.</p>
As varied on the date this instrument was signed	<p>12. To mitigate impacts to Carnaby's Black Cockatoo, the approval holder must submit a <i>Clearing and Revegetation Management Plan</i> for the Minister's approval. The plan must include:</p> <ul style="list-style-type: none"> (a) a commitment to the staged collection of native seed from the areas shaded blue and areas shaded green at <u>Attachment A1</u>, prior to the clearing of these areas, for use in revegetation; (b) a commitment to store native seed and either use it on-site for revegetation or transport it to a seed bank or receiving site(s) where revegetation is being undertaken by WA DPaW or another receiving party (or parties); (c) detailed protocols for staged collection and use of native seed required by conditions 12(a) and 12(b) including:

Date of decision	Conditions attached to approval
	<ul style="list-style-type: none"> i. the optimal methodology for native seed collection from the proposal site; ii. how clearing will be staged to best harvest and utilise the native seed resource for revegetation; iii. how native seed will be stored and transported; and iv. onsite supervision and implementation monitoring mechanisms. <p>The approval holder must implement the <i>Clearing and Revegetation Management Plan</i> approved by the Minister in writing.</p>
Variation dated 21/7/2014	<p>13. The approval holder must not undertake any clearing of habitat for Carnaby's Black Cockatoo on the proposal site unless:</p> <ul style="list-style-type: none"> (a) the <i>Conservation Management Plan</i> required under condition 10 has been approved by the Minister; and (b) the <i>Clearing and Revegetation Management Plan</i> required under condition 12 has been approved by the Minister.
Variation dated 21/7/2014	<p>14. To offset the loss of habitat for Carnaby's Black Cockatoo, prior to the commencement of construction, the approval holder must provide the Department with written evidence of the provision of funds to WA DPaW for the acquisition of the offset property on Lot 24, Mimegarra Road, Lancelin, WA (Attachment C). The written evidence must be accompanied with the offset attributes and Shapefile.</p>
As varied on the date this instrument was signed	<p>15. To offset the additional loss of habitat for Carnaby's Black Cockatoo, the approval holder must provide the Department with written evidence of the provision of funds to WA DPaW to acquire 34 hectares of Carnaby's Black Cockatoo habitat (the additional offset). The written evidence along with the offset attributes and Shapefile must be provided to the Department prior to undertaking the clearing of up to 2.88 hectares within the areas shaded green at <u>Attachment A</u> as specified in condition 9(a) prior to the variation made on the date this instrument was signed.</p>
As varied on the date this instrument was signed	<p>16: To offset the further additional loss of habitat for Carnaby's Black Cockatoo, the approval holder must provide a second additional offset comprising either:</p> <ul style="list-style-type: none"> a) Legal securement in perpetuity of an offset site that: <ul style="list-style-type: none"> i. is a property containing no less than 40 ha of Carnaby's Black Cockatoo habitat with a habitat quality score of 8 or more out of 10 in accordance with the Environmental Offsets Policy and maintained for conservation; and ii. fully offsets the further additional loss of habitat in accordance with the Environmental Offsets Policy; and iii. has been agreed to by the Minister in writing, prior to its legal securement; OR b) A provision of funds to the WA DBCA that demonstrably provides all necessary funding for the purchase of at least 40 hectares within an offset site containing no less than 40 ha of Carnaby's Black Cockatoo habitat with a habitat quality score of 8 or more out of 10 in accordance

Date of decision	Conditions attached to approval
	with the Environmental Offsets Policy , as agreed by the Minister in writing prior to the provision of the funds.
As varied on the date this instrument was signed	17. The approval holder must not commence works that are part of the further additional loss of habitat for Carnaby's Black Cockatoo until the approval holder has provided the second additional offset required under Condition 16.

Date of decision	Definitions attached to approval
Variation dated 7/4/2016	Additional offset is a property (or part of a property) totalling 34 or more hectares of Carnaby's Black Cockatoo habitat purchased by WA DPaW on behalf of the approval holder, which will be maintained for conservation by WA DPaW .
As varied on the date this instrument was signed	Business day means a day that is not a Saturday, a Sunday or a public holiday in the state or territory of the action.
Original dated 18/7/2013	Clearing is defined as the cutting down, felling, thinning, logging, removing, killing, destroying, poisoning, ringbarking, uprooting or burning of native vegetation.
Original dated 18/7/2013	Commencement includes clearing and any preparatory works required to be undertaken including clearing vegetation, the erection of any fences, signage or on-site temporary structures and the use of construction or excavation equipment on site for the purpose of breaking the ground for buildings, infrastructure or resource extraction.
Original dated 18/7/2013	Construction includes any preparatory works required to be undertaken including clearing vegetation, the erection of any on-site temporary structures and the use of heavy duty equipment for the purpose of breaking the ground for buildings or infrastructure.
Original dated 18/7/2013	Department is the Australian Government Department administering the <i>Environment Protection and Biodiversity Conservation Act 1999</i> .
As varied on the date this instrument was signed	Environmental Offsets Policy means the Department's Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy, October 2012
Original dated 18/7/2013	EPBC Act is the <i>Environment Protection and Biodiversity Conservation Act 1999</i> .
As varied on the date this instrument was signed	Further additional loss of habitat means the additional clearing of 2.56 ha of Carnaby's Black Cockatoo foraging habitat within areas shaded blue and areas shaded green at Attachment A1 (changed from 40.89 hectares to 43.45 hectares) enabled by the variation of condition 9 on the date this instrument was signed.
Variation dated 21/7/2014	Independent Revegetation Expert - Revoked
Original dated 18/7/2013	Minister is the minister administering the <i>Environment Protection and Biodiversity Conservation Act 1999</i> and includes a delegate of the Minister .
As varied on the date this instrument was signed	Legal securement means to execute a legal status or tenure of the offset site so as to provide enduring protection against it being used in a manner incompatible with the conservation of the habitat of matters protected under the EPBC Act which it contains.

Date of decision	Definitions attached to approval
As varied on the date this instrument was signed	New or increased impact means a new or increased environmental impact or risk relating to any protected matter , or a reduced overall environmental benefit from any restoration or offsetting works, when compared to the likely impact of implementing the action management plan that has been approved by the Minister under conditions 10 and 12, including any subsequent revisions approved by the Minister , as outlined in the <i>Guidance on 'New or Increased Impact' relating to changes to approved management plans under EPBC Act environmental approvals (2017)</i> .
Original dated 18/7/2013	Offset attributes must be in the form of an excel file ('.xls') capturing relevant attributes of the Offset Area, including the EPBC reference ID number, the physical address of the offset site, coordinates of the boundary points in decimal degrees, the EPBC protected matters that the offset compensates for, any additional EPBC protected matters that are benefiting from the offset, and the size of the offset in hectares.
Variation dated 21/7/2014	Offset property is the property that is no less than 635 ha in size (identified as the 'Carnaby's offset site at <u>Attachment C</u>) that will be purchased by the approval holder and will be maintained for conservation by the WA DPaW on behalf of the approval holder. The offset property is Lot 24 (on Deposited Plan 75789) on Mimegarra Road, 27 kilometres north-east of Lancelin, Western Australia.
As varied on the date this instrument was signed	Primary feeding plants - Revoked
Original dated 18/7/2013	Proposal site is Lot 9036 and Part Lot 3054 Marmion Avenue, shown as the 'site boundary' in <u>Attachment A</u> .
Original dated 18/7/2013	Revegetation is the removal of weeds and the long-term establishment of native vegetation.
Original dated 18/7/2013	Shapefile means an ESRI Shapefile containing '.shp', '.shx' and '.dbf' files and other files capturing attributes of the Offset Area, including the shape, EPBC reference ID number and EPBC protected matters present at the relevant site. Attributes should also be captured in '.xls' format.
Original dated 18/7/2013	Substantial commencement is when 1 hectare of land on the proposal site has been impacted by clearing or construction.
Variation dated 21/7/2014	WA DER - Revoked
Variation dated 21/7/2014	WA DPaW is the Western Australian Department of Parks and Wildlife (or equivalent agency).
As varied on the date this instrument was signed	WA DBCA means the Western Australian Department of Biodiversity, Conservation and Attractions (or successor agency)
As varied on the date this instrument was signed	Website means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.

Date of
decision

Attachment A

Variation
dated
7/4/2016



Date of decision

Attachment A1

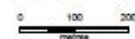
As varied on the date this instrument was signed



Legend:

- Site boundary
- Subdivision layout
- Potential foraging habitat for Carnaby's Black Cockatoo to be cleared (40.57 ha)
- Potential foraging habitat for Carnaby's Black Cockatoo to be retained and cleared in ROS (minimum total area retained 1.72 ha; maximum total area cleared 0.30 ha)

Scale 1:10,000 at A4



Coord. Sys. GDA 1994 MGA Zone 50



Job No: 57481

Client: Estates Development Company

Version: A

Date: 17-Dec-2019

Drawn By: nsullivan

Checked By: RM

Jindee, WA

REVISED ATTACHMENT A

FIGURE 1



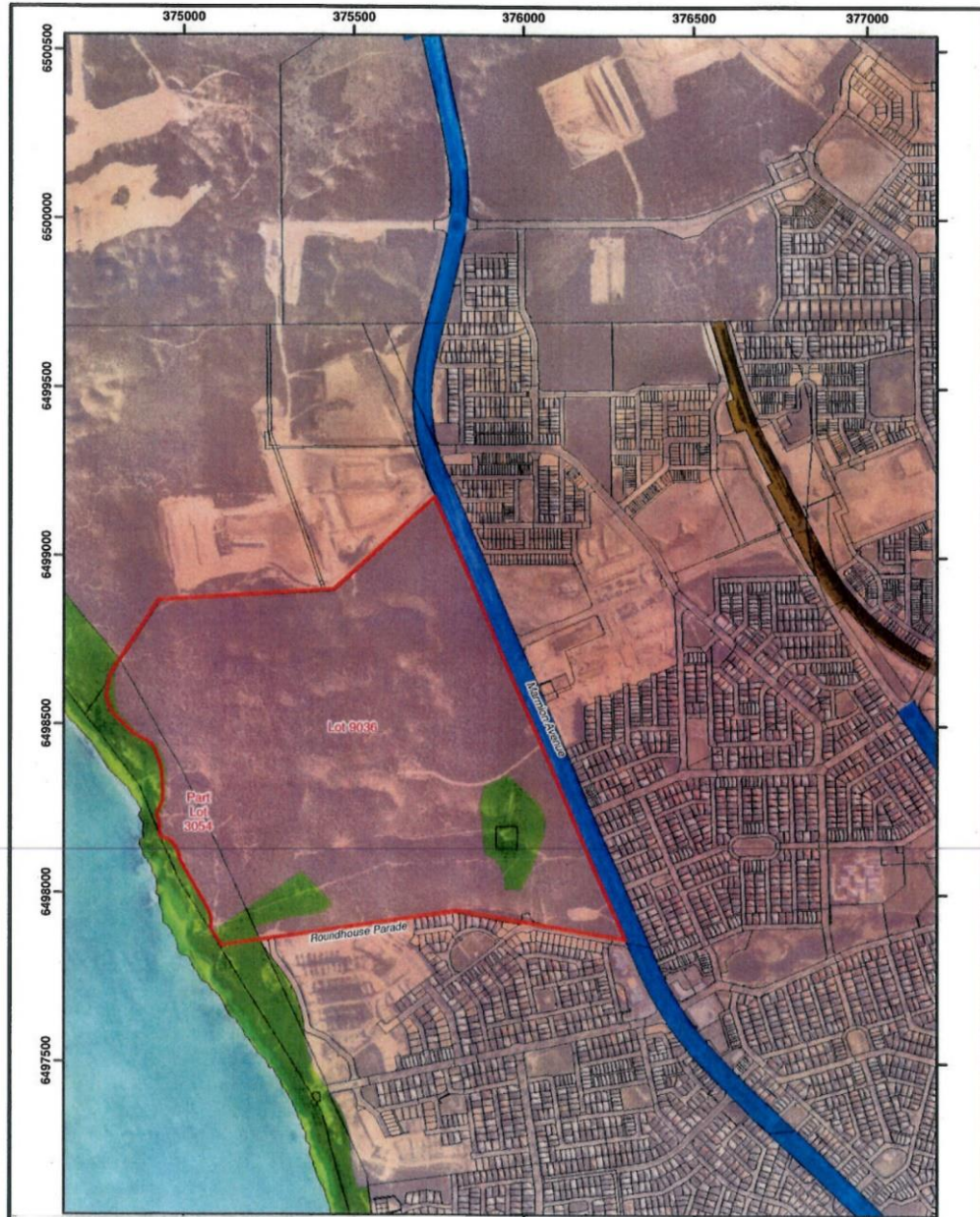
File Name: W:\Projects\117\Attachments_Plan\Environment\PS231_Series_PSD\Siteplan_Series and variation to road\RoadPS10MainPS10_Series_PSD231.dwg 2019-12-17 10:00:00



Date of decision

Attachment B

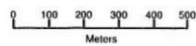
Original dated
18/7/2013



Attachment B



Coordinate System: GDA 1994 MGA Zone 58
Date: 19/10/2012
Author: R. Ivie



1:15,000
at A4

Source: Topography: Geoscience Australia 2004. MRS: DPI 2012.
Cadastral: Online SIF Database, Landgate 09/2012.
Note that positional errors may occur in some areas.

Legend

- Site boundary
- Metropolitan Region Scheme
- Urban
- Other Regional Roads
- Parks and Recreation
- Railways
- Waterways
- Cadastral boundaries

Path: G:\GP\Corridor\2012\DC\12133\01\ArcMap_documents\K001\K001\DC\12133_01_K001_RevB_1005.mxd



Date of
decision

Variation
dated
21/7/2014

Attachment C



Attachment C - Location of offset site (635 ha within Lot 24)

Scale 1:30,000 at A4

0 150 300 450 600 750 m

Coordinate System: GDA 1994 MGA Zone 50
Note that positional errors may occur in some areas

Date: 19/06/2014

Author: JChute

Source: Aerial image: Landgate, flown 27/02/2012, downloaded 02/2013.

Path: Q:\Consult\2012\EDC\EDC12133.01\ArcMap_documents\LD15\EDC12133_01_L015_AttachmentC.mxd

Legend

- Carnaby's offset site
- Lot 24 Mimegarra Road (1000 ha)



STRATEGEN
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www.strategen.com.au

Appendix B Conservation Management Plan Audit Findings

Table B.1: Conservation Management Plan (Revision 4) Audit Findings

Reference	Action	Timing	Evidence	Comments	Conformance status
CMP 1	Section 3.1 Westminster will implement works funded to the order of \$393 000 (excl GST), as agreed by the WAPC to implement all relevant management actions in the two Parks and Recreation Reserves (A and B), until the management of those areas is handed over to another party, which is mostly likely to be the WAPC.	During construction	EDC Management Advice on 22 March 2021	Apart from fencing and fire breaks, management actions in the Parks and Recreation Reserves have not yet commenced and are not yet required A land exchange was completed in 2016 which transferred the ownership of the Parks and Recreation Reserves to WAPC.	C
CMP 2	Section 3.1 The reserves will be handed over within 5 years of substantial commencement of the action, which will occur when land titles are created through the subdivision process administered by the WAPC.	Within 5 years of commencement date (by 4 February 2020) when land titles are created.	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	A land exchange was completed in 2016 which transferred the ownership of the Parks and Recreation Reserves to WAPC. Certificate of titles for the Parks and Recreation Reserves, were issued in May 2016.	C (complete)
CMP 3	Section 3.1 The works to be undertaken by Westminster are outlined in Appendix 2, and will include: <ul style="list-style-type: none"> • fire management • installation of appropriate barriers to prevent pedestrian access such as fencing and access gates to dunes • installation of public amenities (i.e. pathways and observation deck) • infill planting/seeding and weed control of areas to be revegetated as per the Clearing and Revegetation Management Plan and Table 3. 	During construction	EDC Management Advice on 22 March 2021	Apart from fencing to prevent unauthorised access and fire breaks around the whole site, works in the Parks and Recreation Reserves have not yet commenced and are not yet required.	C
CMP 4	Table 3 - Management measures for the Parks and Recreation reserves Carnaby's Cockatoo habitat being retained will be delineated by survey along clearing boundaries and protected by the installation of temporary fencing or survey pegs and flagging tape.	Prior to clearing	Site inspection on 29 March 2021 P029_Strategen-JBS&G_ROS temporary fencing Jindee site audit_29032021 P031_Strategen-JBS&G_ROS temporary fencing Jindee site audit_29032021	Fencing was installed in a previous audit period around the Parks and Recreation reserves that were adjacent or near to construction works. Construction works for Stage 5 during the current audit period were not adjacent to the Parks and Recreation Reserves. Temporary fencing around Carnaby's Cockatoo habitat (ROS) was sighted by the auditor during the site inspection on 29 March 2021 (P029, P031).	C
CMP 5	Table 3 - Management measures for the Parks and Recreation reserves GPS co-ordinates of areas approved to be cleared and those required to be retained will be provided to the contractor to ensure no unapproved clearing is undertaken.	Prior to clearing	C004_Stantec_Jindee Stage 5 - Construction Drawings Digital files_17032020	Stantec (on behalf of Estates Development Company) provided a copy of the construction drawings and digital files (including GPS co-ordinates) of the Stage 5 earthworks and clearing boundaries to the construction contractors Croker Construction. The transmittal (C004) shows that the data was provided to the contractors on 17 March 2020, prior to the commencement of Stage 5 works on 6 April 2020.	C
CMP 6	Table 3 - Management measures for the Parks and Recreation reserves Appropriate barriers to prevent pedestrian access such as fencing will be installed around the perimeter of the Parks and Recreation Reserves.	During construction	Site inspection on 29 March 2021 P027_Strategen-JBS&G_ROS and access point Jindee site audit_29032021 P029_Strategen-JBS&G_ROS temporary fencing Jindee site audit_29032021 P031_Strategen-JBS&G_ROS temporary fencing Jindee site audit_29032021	Temporary fencing and appropriate barriers around Carnaby's Cockatoo habitat (ROS) were sighted by the auditor during the site inspection on 29 March 2021 (P027, P029, P031).	C
CMP 7	Table 3 - Management measures for the Parks and Recreation reserves Access point in the form of a single gate will be installed at strategic locations in the Parks and Recreation Reserves.	During construction	Site inspection on 29 March 2021 P003_Strategen-JBS&G_Access point northern POS Jindee site audit_29032021 P027_Strategen-JBS&G_ROS and access point Jindee site audit_29032021	Appropriate access points have been installed around the Parks and Recreation Reserves (ROS, P027) and adjacent to the northern POS area (P003), and single gates will be installed during future development works.	C

Reference	Action	Timing	Evidence	Comments	Conformance status
CMP 8	Table 3 - Management measures for the Parks and Recreation reserves Stabilised gravel path, limestone bollards and an observation deck will be installed within the Parks and Recreation Reserve to ensure controlled public use.	During construction	EDC Management Advice on 22 March 2021 C003_Strategen-JBS&G_Jindee BMP for Stage 5_September 2020	Apart from fencing and fire breaks, management actions in the Parks and Recreation Reserves have not yet commenced and are not yet required. Strategen-JBS&G fire management team advised in September 2020 that the interim firebreak has been implemented and maintained around POS 11 conservation vegetation and no other actions in the POS are required at this stage (C003).	C
CMP 9	Table 3 - Management measures for the Parks and Recreation reserves Gravel fire access tracks will be constructed in accordance with the Fire Management Plan.	During construction	EDC Management Advice on 29 March 2021	Refer to CMP 8	NA
CMP 10	Table 3 - Management measures for the Parks and Recreation reserves Firebreak creation, maintenance, removal of dead branches, and general fire prevention activities will be undertaken as recommended in the Fire Management Plan*. Note: Avoid disturbance of any Carnaby's Cockatoo habitat in Parks and Recreation areas for the purpose of firebreak creation.	Ongoing	EDC Management Advice on 29 March 2021 C003_Strategen-JBS&G_Jindee BMP for Stage 5_September 2020	Management advised that a fire break has been installed around the whole site as per the relevant bushfire management plans (BMP). Phase 1 BMP was prepared June 2015 to cover the northern half of the Jindee site for early stages of development; and Stage 5 BMP prepared October 2017 to accompany stage 5 subdivision and was approved by the West Australian Planning Commission (WAPC) (C003). Strategen-JBS&G fire management team advised in September 2020 that all relevant fuel hazard reduction measures relating to the currently constructed/developed areas have been implemented as stated in the approved Phase 1 BMP and Stage 5 BMP, including vegetation clearing, maintenance of low threat staging buffers and firebreak construction (C003). It was confirmed that all relevant actions of the Stage 5 BMP had been implemented correctly, as per the Stage 5, Release 2 BMP compliance and condition clearance report (July 2020) (C003).	C
CMP 11	<i>Removed.</i>				
CMP 12	Table 3 - Management measures for the Parks and Recreation reserves Determine appropriate method and timing of weed control in consultation with a suitably qualified specialist, based on monitoring results as described in the CRMP.	As per CRMP	EDC Management Advice on 22 March 2021	This action refers to the degraded areas within the Parks and Recreation areas that are not proposed to be used for pathways and infrastructure. Revegetation of these areas and weed control will be conducted after construction of pathways and infrastructure. Construction in the vicinity of the Parks and Recreation Reserves is yet to commence. Note: Initial monitoring for % weed cover scheduled for "during construction" in the CRMP (refer to CRMP 9).	NA
CMP 13	Table 3 - Management measures for the Parks and Recreation reserves Implement weed control.	As determined by CMP 12 and CRMP	EDC Management Advice on 22 March 2021	Refer to CMP 12.	NA
CMP 14	Table 3 - Management measures for the Parks and Recreation reserves Monitor weed control results and implement further control if required as described in the CRMP.	As determined by CMP 12	EDC Management Advice on 22 March 2021	Refer to CMP 12.	NA
CMP 15	Table 3 - Management measures for the Parks and Recreation reserves All vehicles, machinery and equipment will be free of mud and soil.	When entering Parks and Recreation areas	EDC Management Advice on 29 March 2021	No authorised vehicles or machinery entered the Parks and Recreation reserves during the audit period.	NA
CMP 16	Table 3 - Management measures for the Parks and Recreation reserves Engage a qualified and licensed subcontractor, if necessary to undertake pest fauna control/removal appropriate to the species detected, based on monitoring described in CRMP.	On advice of qualified subcontractor	R010_Strategen-JBS&G_Jindee weed and pest survey Spring 2020_06042021 R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Monitoring for pest fauna in the central and eastern POS was undertaken in Spring 2020 (R010). The report recommended that monitoring for pests should be continued at the site; however, no pest/control removal measures were recommended (similar to Spring 2019 pest survey results (R001)).	C
CMP 17	POS/civic spaces¹ Table 4: Management measures for delineating areas to be retained Carnaby's Cockatoo habitat being retained will be delineated by survey along clearing boundaries and protected by the installation of temporary fencing in areas adjacent to	Prior to clearing	Site inspection on 29 March 2021 R001_Strategen-JBS&G_Jindee ACR 2020_09042020 P004_Strategen-JBS&G_northern POS temporary fencing Jindee site audit_29032021	The three POS areas were delineated in a previous audit period (R001) and temporary fencing has been installed in areas adjacent to construction activity. The temporary fenced areas in the POS were sighted by the auditor on 29 March 2021 (P004, P006, P021). Recommendation	C

Reference	Action	Timing	Evidence	Comments	Conformance status
	construction activity, or survey pegs and flagging tape where construction activity is not occurring.		P006_Strategen-JBS&G_eastern POS temporary fencing Jindee site audit_29032021 P021_Strategen-JBS&G_central POS temporary fencing Jindee site audit_29032021	Some of the temporary fencing had holes in it which should be fixed to prevent unauthorised access, although it was noted that POS areas have been removed from the variation to EPBC Conditions 2012/6631 (Appendix A).	
CMP 18	POS/civic spaces¹ Table 4: Management measures for delineating areas to be retained Temporary signage will be installed in accordance CoW standard signage policy to restrict construction workers from entering Carnaby's Cockatoo habitat being retained.	Prior to clearing	Site inspection on 29 March 2021 P003_Strategen-JBS&G_Access point northern POS Jindee site audit_29032021 P020_Strategen-JBS&G_central POS signage Jindee site audit_29032021 R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Temporary signage notifying workers of access restrictions into POS areas was sighted during the site inspection on 29 March 2021 (P003, P020). CoW has previously confirmed with EDC there was no relevant signage policy or licensing requirements for this type of temporary signage (R001).	C
CMP 19	POS/civic spaces¹ Table 4: Management measures for delineating areas to be retained GPS co-ordinates of areas approved to be cleared and those required to be retained will be provided to the contractor to ensure no unapproved clearing is undertaken.	Prior to clearing	C004_Stantec_Jindee Stage 5 - Construction Drawings Digital files_17032020	As per CMP 5, Stantec (on behalf of Estates Development Company) provided a copy of the construction drawings and digital files (including GPS co-ordinates) of the Stage 5 earthworks and clearing boundaries to the construction contractors Croker Construction. The transmittal (C004) shows that the data was provided to the contractors on 17 March 2020, prior to the commencement of Stage 5 works on 6 April 2020.	C
CMP 20	POS/civic spaces¹ Table 4: Management measures for delineating areas to be retained Appropriate barriers to prevent pedestrian access such as fencing, will be installed around the perimeter of POS areas or retained habitat within CoW specifications designed to prevent public access.	During construction	Site inspection on 29 March 2021 R001_Strategen-JBS&G_Jindee ACR 2020_09042020 P004_Strategen-JBS&G_northern POS temporary fencing Jindee site audit_29032021 P006_Strategen-JBS&G_eastern POS temporary fencing Jindee site audit_29032021 P021_Strategen-JBS&G_central POS temporary fencing Jindee site audit_29032021	As per CMP 17, three POS areas were delineated in a previous audit period (R001) and temporary fencing has been installed in areas adjacent to construction activity. The temporary fenced areas in the POS were sighted by the auditor on 29 March 2021 (P004, P006, P021).	C
CMP 21	POS/civic spaces¹ Table 4: Management measures for delineating areas to be retained Access points will be installed at strategic locations in the POS areas to CoW requirements.	During construction	Site inspection on 29 March 2021 P003_Strategen-JBS&G_Access point northern POS Jindee site audit_29032021	Strategic access points have been installed around the POS areas (P003).	C
CMP 22	POS/civic spaces¹ Table 4: Management measures for delineating areas to be retained Permanent signage will be installed to encourage public education and awareness on: <ul style="list-style-type: none"> the importance of retained bushland the detrimental effects of rubbish, weeds and pathogens on biodiversity the importance of keeping to the designated walking tracks the requirement for dogs to be on a lead in designated areas. 	During construction	EDC Management Advice on 29 March 2021	Permanent signage was not yet required as there is no authorised access by the public during the audit period and construction works have not yet commenced.	NA
CMP 23	Removed.				
CMP 24	Removed.				
CMP 25	POS/civic spaces¹	During construction	EDC Management Advice on 29 March 2021	Management confirmed water carts were used for dust suppression during stage 5 construction works and the application of hydromulch to cleared areas was observed by the	C

Reference	Action	Timing	Evidence	Comments	Conformance status
	Table 5 Management measures for erosion and dust control measures during construction Cleared areas and any dry, dust-prone areas or stockpiles will be stabilised to prevent dust generation. Stabilisation methods may include wetting (through use of water trucks), application of hydromulch, use of chemical polymers (if required) or other sealing material.		Site inspection on 29 March 2021 P008_Strategen-JBS&G_Stage 5 hydromulch Jindee site audit_29032021 P018_Strategen-JBS&G_hydromulch adjacent to eastern POS Jindee site audit_29032021 R011_Strategen-JBS&G_Jindee Stage 5 site audit_September 2020 R014_Croker Construction_Jindee Stage 5_PMP 953 Rev 1	auditor during the site inspection on 29 March 2021. Dust monitoring was also undertaken during stage 5 works, as noted during the stage 5 site audit in September 2020 (R011). Croker Construction Project Management Plan (PMP) for stage 5 works (R014) also details the dust minimisation and management measures to be implemented during clearing and construction works.	
CMP 26	POS/civic spaces¹ Table 5 Management measures for erosion and dust control measures during construction Vehicle speeds will be restricted to 40 km/hr to minimise dust generation on designated roads, access tracks and within construction areas.	During construction	R008_Strategen-JBS&G_Stage 5 Jindee Environmental Induction R009_Jindee Stage 5_Environment induction register_April 2020 P027_Strategen-JBS&G_ROS and access point Jindee site audit_29032021 Site inspection on 29 March 2021	Croker construction completed an environmental induction for clearing of Stage 5 between April and August 2020 (R008, R009). The induction included restriction of vehicle speeds to 40 km/hr to minimise dust generation. Signage at the access to the construction area for Stage 5 works was still in place at the time of the site audit and shows speed limits restricted to 10 km/hr (P027).	C
CMP 27	POS/civic spaces¹ Table 6 weed management measures Identify weeds occurring in retained habitat in POS/Civic areas.	Annually	R010_Strategen-JBS&G_Jindee weed and pest survey Spring 2020_06042021	Strategen-JBS&G undertook a weed assessment survey Spring 2020 in the central and eastern POS areas (R010). Results identified a total of 24 weed species in the central POS and 19 weed species in the eastern POS, which is an increase from 2019. The survey report concludes that “weed diversity had not changed substantially between 2017 and 2019. Changes in species composition is likely to have occurred over survey years and is likely a factor of survey timing. Different suites of species would be identifiable at different stages of spring due to timing of flowering, seed set and plant senescence across species” (R010).	C
CMP 28	POS/civic spaces¹ Table 6 weed management measures Determine appropriate method and timing of weed control in consultation with a suitably qualified specialist.	Annually Weed control will commence in POS/Civic areas when those POS/Civic areas are directly adjacent or within the current stage of construction. Weed control will continue to be implemented by Westminster until the POS/Civic area is handed over to the City of Wanneroo for management	Site inspection on 29 March 2021 R010_Strategen-JBS&G_Jindee weed and pest survey Spring 2020_06042021 R011_Strategen-JBS&G_Jindee Stage 5 site audit_September 2020	During the audit period Stage 5 construction works were undertaken adjacent to the eastern and central POS areas. As per CMP 27, a weed assessment survey was undertaken in Spring 2020 in the central and eastern POS areas, which recommended that a weed control and monitoring program should be implemented within the POS area, particularly in firebreaks surrounding the POS areas and around fencelines, to minimise ingress of weed seeds and propagules (R010). A site audit undertaken during Stage 5 works (R011) also identified weed control needed to be implemented.	C
CMP 29	POS/civic spaces¹ Table 6 weed management measures Implement weed control.	As determined by previous step	Site inspection on 29 March 2021 R010_Strategen-JBS&G_Jindee weed and pest survey Spring 2020_06042021 R011_Strategen-JBS&G_Jindee Stage 5 site audit_September 2020	As per CMP 28, weed control was identified as needing to be undertaken in both the eastern and central POS. The implementation of weed control as recommended in the Spring 2020 weed assessment survey (R010) and Stage 5 site audit (R011) was not undertaken prior to the end of the audit period in February 2021 and therefore results in a non-conformance with this management action. It was noted by the auditor during the site inspection that preparations are currently underway to undertake weed control in both the eastern and central POS by Tranen. This PNC is administrative only given that the MPs were under revision during the audit period and have since been approved to have the requirement for weed management in the POS removed. Please note that next year’s audit will only assess compliance against the updated MPs. Recommendation Weed control to be implemented in both the eastern and central POS as soon as practicable	NC
CMP 30	POS/civic spaces¹ Table 6 weed management measures	Annually		Refer to EMP 28.	NC

Reference	Action	Timing	Evidence	Comments	Conformance status
	Monitor weed control results and implement further control if required, on the advice of CoW (e.g. bushland management personnel) or suitably qualified specialist.			This PNC is administrative only given that the MPs were under revision during the audit period and have since been approved to have the requirement for weed management in the POS removed. Please note that next year's audit will only assess compliance against the updated MPs.	
CMP 31	POS/civic spaces¹ Table 7 Pathogen management measures All construction personnel will be inducted in relation to dieback risk, potential impacts and management.	During construction	R008_Strategen-JBS&G_Stage 5 Jindee Environmental Induction R009_Jindee Stage 5_Environment induction register_April 2020	Croker Construction completed an environmental induction prior to Stage 5 works which covered dieback risk and management (R008). An induction register was provided (R009)	C
CMP 32	POS/civic spaces¹ Table 7 Pathogen management measures All vehicles, machinery and equipment will be free of mud and soil.	During construction – when arriving at site	R007_Croker Construction_Jindee stage 5 Vehicle Washdown Report_2020	There were no vehicles or machinery on site at the time of the audit. Croker Construction provided a copy of their washdown register for machinery and plant to be washed down prior to entering site for Stage 5 construction works (R007).	C
CMP 33	POS/civic spaces¹ Table 8 Fire management measures A Fire Management Plan will be prepared as required in accordance with CoW standard operating procedures.	Pre-construction	R006_Strategen-JBS&G BMP Compliance Jindee Stage 5 Release 2 (Rev 0)_July 2020	City of Wanneroo approved the Jindee Fire Management Plan (FMP) on 9 July 2015 for the first four stages. A Stage 5 BMP Compliance Report was approved in July 2020 (R006).	C
CMP 34	POS/civic spaces¹ Table 8 Fire management measures Firebreak creation, maintenance, removal of dead branches, and general fire prevention activities will be undertaken as recommended in the Fire Management Plan.	Ongoing	EDC Management Advice on 29 March 2021 C003_Strategen-JBS&G_Jindee BMP for Stage 5_September 2020	Refer CMP 10. Management advised that a fire break has been installed around the whole site as per the relevant bushfire management plans (BMP). Phase 1 BMP was prepared June 2015 to cover the northern half of the Jindee site for early stages of development; and Stage 5 BMP prepared October 2017 to accompany stage 5 subdivision and was approved by the West Australian Planning Commission (WAPC) (C003). Strategen-JBS&G fire management team advised in September 2020 that all relevant fuel hazard reduction measures relating to the currently constructed/developed areas have been implemented as stated in the approved Phase 1 BMP and Stage 5 BMP, including vegetation clearing, maintenance of low threat staging buffers and firebreak construction (C003). It was confirmed that all relevant actions of the Stage 5 BMP had been implemented correctly, as per the Stage 5, Release 2 BMP compliance and condition clearance report (July 2020) (C003).	C
CMP 35	POS/civic spaces¹ Table 8 Fire management measures A reticulated water supply will be extended throughout the subdivision area to all proposed lots.	During construction	EDC Management Advice on 29 March 2021	Management advised that a reticulated water supply and hydrants were supplied to all lots in Stage 1 and 5 subdivisions.	C
CMP 36	<i>Removed.</i>				
CMP 37	POS/civic spaces¹ Table 9 Feral animal control measures Engage a qualified and licensed subcontractor to undertake pest fauna control/removal appropriate to the species detected, based on monitoring results.	On advice of qualified subcontractor	R010_Strategen-JBS&G_Jindee weed and pest survey Spring 2020_06042021 R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Refer to CMP 16 Monitoring for pest fauna in the central and eastern POS was undertaken in Spring 2020 (R010). The report recommended that monitoring for pests should be continued at the site; however, no pest/control removal measures were recommended (similar to Spring 2019 pest survey results (R001)).	C
CMP 38	POS/civic spaces¹ Table 9 Feral animal control measures Provide community education signage around conservation areas detailing the potential risk domestic cats and dogs may pose to native flora and fauna within the Estate.	To be placed post-construction	EDC Management Advice on 29 March 2021	Permanent signage was not required as there is no authorised public access during the audit period.	NA
CMP 39	Parks & Recreation, POS/civic spaces¹ Table 10: Monitoring actions - Delineation of habitat to be retained Condition of infrastructure delineating Carnaby's Cockatoo habitat (fencing, gates, pathways, signage etc). Purpose: To ensure infrastructure is in good condition and that there has been no unauthorised clearing beyond the barrier.	Quarterly during construction	Site inspection on 29 March 2021 R001_Strategen-JBS&G_Jindee ACR 2020_09042020 P004_Strategen-JBS&G_northern POS temporary fencing Jindee site audit_29032021	Refer to CMP 17. The three POS areas were delineated in a previous audit period (R001) and temporary fencing has been installed in areas adjacent to construction activity. The temporary fenced areas in the POS were sighted by the auditor on 29 March 2021 (P004, P006, P021). Recommendation	C

Reference	Action	Timing	Evidence	Comments	Conformance status
	Location: Retained habitat near clearing boundaries.		P006_Strategen-JBS&G_eastern POS temporary fencing Jindee site audit_29032021 P021_Strategen-JBS&G_central POS temporary fencing Jindee site audit_29032021	Some of the temporary fencing had holes in it which should be fixed to prevent unauthorised access, although it was noted that POS areas have been removed from the variation to EPBC Conditions 2012/6631 (Appendix A).	
CMP 40	Parks & Recreation, POS/civic spaces¹ Table 10: Monitoring actions - Erosion and dust control for retained habitat Visual observations of dust generation and erosion. Purpose: To minimise erosion and dust impacts from construction on retained habitat. Location: Unsealed surfaces prone to dust generation (e.g. roads, stockpiles).	Opportunistically during construction	Site inspection on 29 March 2021 R011_Strategen-JBS&G_Jindee Stage 5 site audit_September 2020	No evidence of dust generation or erosion was observed during the site inspection on 29 March 2021. Clearing and construction for Stage 5 works occurred between April and October 2020. As per CMP 25, dust control during stage 5 works included the use of water carts, dust monitoring and application of hydromulch to cleared areas.	C
CMP 41	Parks & Recreation, POS/civic spaces¹ Table 10: Monitoring actions - Erosion and dust control for retained habitat Dust suppression equipment / actions. Purpose: To minimise erosion and dust impacts from construction on retained habitat. Location: Where potential dust generation is taking place.	Opportunistically during construction	EDC Management Advice on 29 March 2021 Site inspection on 29 March 2021 P008_Strategen-JBS&G_Stage 5 hydromulch Jindee site audit_29032021 P018_Strategen-JBS&G_hydromulch adjacent to eastern POS Jindee site audit_29032021 R014_Crocker Construction_Jindee Stage 5_PMP 953 Rev 1	As per CMP 25, dust suppression equipment/actions applied during stage 5 works included the use of water carts during clearing, dust monitoring and the application of hydromulch to cleared areas (P008, P018) to minimise dust impacts. Dust suppression measures and management actions are outlined in the PMP (R014).	C
CMP 42	Parks & Recreation, POS/civic spaces¹ Table 10: Monitoring actions - Erosion and dust control for retained habitat Visual observation of vegetation health, including dust smothering and erosion. Purpose: To minimise erosion and dust impacts from construction on retained habitat. Location: Retained Carnaby's Cockatoo habitat beyond clearing boundaries.	Opportunistically during construction	Site inspection on 29 March 2021 R012_Crocker Construction Jindee Stage 5 Project Site Inspection_11062020 R013_Crocker Construction Jindee Stage 5 Site Inspection_09092020 P014_Strategen-JBS&G_spoon drain Jindee site audit_29032021 R011_Strategen-JBS&G_Jindee Stage 5 site audit_September 2020	No evidence of dust smothering or erosion in the Parks & Recreation POS/civic spaces was observed by the auditor during the site inspection on 29 March 2021. Dust and erosion control was also inspected for in the Jindee stage 5 site inspections completed by the contractor Crocker Construction, with no issues identified (R012, R013). In addition, a spoon drain was observed to have been installed at the base of the access road batter to prevent erosion into the eastern POS (P014) was observed during the site inspection on 29 March 2021, which was identified as an issue during the stage 5 site audit in September 2020 (R011).	C
CMP 43	Parks & Recreation, POS/civic spaces¹ Table 10: Monitoring actions - Pathogen management for retained habitat Inspection of machinery for construction works. Purpose: To ensure appropriate dieback hygiene are being undertaken. Location: Authorised access points into the site.	At first time of entry and opportunistically during construction.	R007_Crocker Construction_Jindee stage 5 Vehicle Washdown Report_2020 R008_Strategen-JBS&G_Stage 5 Jindee Environmental Induction R009_Jindee Stage 5_Environment induction register_April 2020	As per CMP 32, there were no vehicles or machinery on site at the time of the audit. Crocker Construction provided a copy of their washdown register for machinery and plant to be washed down prior to entering site for Stage 5 construction works. Crocker Construction completed an environmental induction prior to Stage 5 works which covered dieback risk and management (R008). An induction register was provided (R009) Pres-start checks showed that that dieback protection measures include personnel signing off on all plant are clean prior to entering the site.	C
CMP 44	Parks & Recreation, POS/civic spaces¹ Table 10: Monitoring actions - Feral animal control for retained habitat Presence of pests/feral animals/domestic animals (foxes, rabbits and feral cats). Purpose: To determine presence of pests/feral animals within the retained habitat, and whether fauna control is required. Location: Retained Carnaby's Cockatoo habitat in POS/Civic areas until handover.	Annually in Spring and opportunistically	R010_Strategen-JBS&G_Jindee weed and pest survey Spring 2020_06042021	Refer CMP 16 and 37. Monitoring for pest fauna in the central and eastern POS was undertaken in Spring 2020 (R010). No evidence of damage to native plants, or predation on native fauna, was observed. Dog or fox scats and tracks were recorded in the Central and eastern POS in 2020. The report recommended that monitoring for pests should be continued at the site; however, no pest/control removal measures were recommended.	C

Reference	Action	Timing	Evidence	Comments	Conformance status
CMP 45	Parks & Recreation, POS/civic spaces¹ Table 10: Monitoring actions - Carnaby's Cockatoo opportunistic monitoring Presence of Carnaby's Cockatoo (as indicated by sightings, evidence of foraging, etc.). Purpose: To determine presence of Carnaby's Cockatoo within the retained habitat. Location: Retained Carnaby's Cockatoo habitat in POS/Civic areas, and in revegetation areas, until handover.	Opportunistically	Site inspection on 29 March 2021 P001_Croker Construction_Carnaby's cockatoo sightings_August 2020 P002_Croker Construction_Carnaby's cockatoo sightings_August 2020	There were no opportunistic sightings of Carnaby's Cockatoo during the site inspection on 29 March 2021. Opportunistic sightings of Carnaby's cockatoo were photographed during the Stage 5 construction works by Croker Construction (P001, P002)	C
CMP 46	Table 13: Long term management and timeframes for implementation Retained habitat in Parks and Recreation Reserves will be managed by Westminster until completion of construction.	Until completion of construction adjacent to the reserves and completion of CRMP commitments. Formal transfer of management responsibility to the CoW will be the responsibility of WAPC	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Management of retained habitat in Parks and Recreation Reserves has not yet commenced. WAPC will initiate the re-vestment order once Westminster has completed the works required under 10 (g) of the EPBC approval.	NA
CMP 47	Table 13: Long term management and timeframes for implementation Retained habitat in Parks and Recreation Reserves will be the responsibility of WAPC.	WAPC will initiate the re-vestment order once Westminster has completed the works required under 10(g) of the EPBC approval	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Management of retained habitat in Parks and Recreation Reserves has not yet commenced. WAPC will initiate the re-vestment order once Westminster has completed the works required under 10 (g) of the EPBC approval.	NA
CMP 48	Table 13: Long term management and timeframes for implementation Retained habitat in Parks and Recreation Reserves will be vested as Parks and Recreation Reserves as part of the MRS amendment.	During construction	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Parks and Recreation Reserves have been accordingly zoned through a MRS Amendment. A land exchange was completed in 2016 which transferred the ownership of the Parks and Recreation Reserves to WAPC. The vesting and ongoing long term management of these areas will then be the responsibility of the WAPC and will be vested to the CoW.	C (complete)
CMP 49	Table 13: Long term management and timeframes for implementation The CMP will be implemented in POS and civic spaces by Westminster until handed over following the completion of developer maintenance period.	During construction	Site inspection on 29 March 2021 EDC Management advice on 29 March 2021	Management activities conducted during the audit period to implement the CMP within the retained habitat in the central and eastern POS adjacent to the stage 5 construction area have included the maintenance of fences, dust management and weed and pest inspections	C
CMP 50	Table 13: Long term management and timeframes for implementation Retained habitat in POS areas and civic spaces will be handed over at the time the POS and Civic space land titles are created.	Handover will occur at the time the POS and civic space land titles are created	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Land titles of POS areas and civic spaces have not yet been created.	C
CMP 51	Removed.				
CMP 52	Removed.				
CMP 53	Removed.				

Notes:

¹ POS/civic spaces referred to in the CMP (revision 4, 2016) that has been assessed for compliance during this audit period has been updated CMP (revision 8, December 2020) to remove reference to POS.

Appendix C Clearing and Revegetation Management Plan Audit Findings

Table C.1: Clearing and Revegetation Management Plan (Revision 4) Audit Findings

Ref	Action	Timing	Evidence	Comments	Conformance status
CRMP 1	Section 3.2 Detailed protocols for the collection and use of native seed There is 0.75 ha of degraded habitat that has been identified within the proposal site as per Figure 3. Degraded areas not proposed to be used for pathways and recreational infrastructure will be revegetated.	Revegetation	R001_Strategen-JBS&G_Jindee ACR 2020_09042020 EDC Management advice on 22 March 2021	Base plans for revegetation areas in Parks and Recreation Area A and B have been prepared and conform to Figure 3 of CRMP. Commencement of landscaping (i.e. installation of pathways and recreation infrastructure) within Parks and Recreation Reserves has not yet commenced.	C
CRMP 2	Section 3.2 Detailed protocols for the collection and use of native seed Placement of primary feeding trees and shrubs will occur within the two Parks and Recreation Areas and other areas may include POS/civic spaces and streetscapes.	Revegetation	EDC Management advice on 22 March 2021	Revegetation and landscaping has not yet commenced in Parks and Recreation Areas. There were no POS or streetscapes created during the audit period.	NA
CRMP 3	Table 3 Detailed protocols for the collection and use of native seed Seek quotations and engage contractor licensed by DPaW to collect seed from areas of Carnaby's Cockatoo habitat to be cleared when Carnaby's Cockatoo foraging species are seeding based on advice from seed collectors.	Pre-construction	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Tranen provided a quote for seed collection, processing and storage and was subsequently engaged to undertake the quoted tasks in a previous audit period (R_001).	C (complete)
CRMP 4	Table 3 Detailed protocols for the collection and use of native seed Undertake seed collection in designated areas of Carnaby's Cockatoo habitat proposed to be cleared (Figure 2).	Pre-construction	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Correspondence from Tranen confirmed that seed was collected in the Carnaby's Cockatoo habitat to be cleared. Seed collection will provide sufficient volumes and species richness of the key Carnaby's Black Cockatoo foraging species for the purposes of the revegetation within the Project site. Seed Bank Statement verifies the seed collected and collection date (December to March 2014). No more seed needs to be collected.	C (complete)
CRMP 5	Table 3 Detailed protocols for the collection and use of native seed Ensure seed for on-site revegetation and street scaping plus any off-site use is stored and transported in accordance with Revegetation Industry Association of Western Australia (RIAWA) standards to ensure seed viability (RIAWA 2014a, 2014b).	Pre-construction and during construction	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Quote for seed collection services from Tranen and company brochure states that all seed services are compliant with RIAWA guidelines.	C
CRMP 6	Table 3 Detailed protocols for the collection and use of native seed Monitor native seed and maintain a register of volumes, species collected, locations and quantities.	Pre-construction	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	The Seed Bank Statement from Tranen outlines species collected, quantities (weight of seed per species) and location. This monitoring record was set up in 2014, prior to construction.	C
CRMP 7	Table 3 Detailed protocols for the collection and use of native seed Any native seed that cannot be utilised in the Project Area will be provided to DPaW or other receiving party (or parties).	During construction	EDC Management advice on 22 March 2021	Seeds have not yet been utilised and are in storage. Revegetation has not commenced.	NA
CRMP 8	Table 3 Detailed protocols for the collection and use of native seed Select on-site reference sites containing landforms and vegetation comparable (or likely to have been comparable) to those areas proposed to be revegetated.	Pre or during construction	EDC Management advice on 22 March 2021	Revegetation did not commence during this audit period, as such, selection of reference sites was not required during this audit period.	NA
CRMP 9	Table 3 Detailed protocols for the collection and use of native seed Survey the onsite reference sites to determine indicator species, density of native species, % cover of native species, native species richness and % weed cover.	Pre or during construction	EDC Management advice on 22 March 2021	Refer to CRMP 8.	NA
CRMP 10	Table 3 Detailed protocols for the collection and use of native seed Determine success criteria for revegetation sites based on the survey of the reference sites.	During construction	EDC Management advice on 22 March 2021	Revegetation did not commence, and reference sites were not surveyed during this audit period.	NA
CRMP 11	Table 3 Detailed protocols for the collection and use of native seed Provide temporary barriers to prevent pedestrian access; such as fencing, and signage around degraded areas identified for revegetation.	During construction	EDC Management advice on 29 March 2021 Site inspection on 29 March 2021 P004_Strategen-JBS&G_northern POS temporary fencing Jindee site audit_29032021 P015_Strategen-JBS&G_Eastern POS fencing Jindee site audit_29032021 P020_Strategen-JBS&G_central POS signage Jindee site audit_29032021	Management advised that temporary barriers have been installed around entire construction area, but not specifically around degraded areas identified for revegetation yet. The eastern most Parks and Recreation area has been entirely fenced. Temporary fencing and signage were observed during the site audit on 29 March 2021 for the central and eastern and northern POS (P004, P015, P020) and part of the eastern ROS (P029).	C

Ref	Action	Timing	Evidence	Comments	Conformance status
			P029_Strategen-JBS&G_ROS temporary fencing Jindee site audit_29032021		
CRMP 12	Table 3 Detailed protocols for the collection and use of native seed Undertake weed control as required at the revegetation site until targets are achieved as per Section 4 and 6.	During construction	EDC Management advice on 22 March 2021	Revegetation did not commence during the audit period.	NA
CRMP 13	Table 3 Detailed protocols for the collection and use of native seed Primary feeding plants for the Carnaby's Cockatoo will not be planted along roads with speed limits exceeding 50 km/hr (to minimise the risk to Carnaby's Cockatoo).	During construction	EDC Management advice on 22 March 2021	Planting of street scapes from native seed did not commence during the audit period.	NA
CRMP 14	Table 3 Detailed protocols for the collection and use of native seed Determine the quantity of seed of various native flora species required for broadcasting within on-site revegetation areas.	During construction	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Seed collection was completed during a previous audit period. Refer to CRMP 6.	C (complete)
CRMP 15	Table 3 Detailed protocols for the collection and use of native seed Prior to direct seeding, seed should undergo the appropriate treatments required to break dormancy and improve germination rates. The treatments could include smoking, freezing, boiling or scarifying.	During construction	EDC Management advice on 22 March 2021	Direct seeding did not commence during this audit period.	NA
CRMP 16	Table 3 Detailed protocols for the collection and use of native seed Undertake seed viability and germination testing if deemed necessary.	During construction	EDC Management advice on 22 March 2021	Direct seeding did not commence during this audit period.	NA
CRMP 17	Table 3 Detailed protocols for the collection and use of native seed After achieving required weed control, area should be raked (scarified) in preparation for direct seeding.	During construction	EDC Management advice on 22 March 2021	Direct seeding did not commence during this audit period.	NA
CRMP 18	Table 3 Detailed protocols for the collection and use of native seed The treated seed should be combined with an appropriate medium (e.g. yellow sand or vermiculite) and manually distributed (i.e. broadcast by hand) by an experienced operator, ensuring an even coverage over the whole area.	During construction	EDC Management advice on 22 March 2021	Direct seeding did not commence during this audit period.	NA
CRMP 19	Table 3 Detailed protocols for the collection and use of native seed Determine the quantity of various flora species required to be propagated for on-site revegetation annually.	Pre-construction	EDC Management advice on 22 March 2021 R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Revegetation did not commence during this audit period, as such, propagation of seedlings was not required. Tranen have previously advised that the quantity of seed collected is sufficient for revegetation purposes.	NA
CRMP 20	Table 3 Detailed protocols for the collection and use of native seed Engage a nursery to propagate seedlings (if seedlings are included as part of the annual revegetation program).	During construction	EDC Management advice on 22 March 2021	Refer to CRMP 19.	NA
CRMP 21	Table 3 Detailed protocols for the collection and use of native seed For on-site revegetation produce propagated plants from local provenance seed in an accredited nursery.	During construction	EDC Management advice on 22 March 2021	Refer to CRMP 19.	NA
CRMP 22	Table 3 Detailed protocols for the collection and use of native seed Ensure the quantities of plants are available for pick-up or delivery to the contractor.	During construction	EDC Management advice on 22 March 2021	Refer to CRMP 19.	NA
CRMP 23	Table 3 Detailed protocols for the collection and use of native seed Determine appropriateness of additives, which could include Seasol (or equivalent), water granules, soil breaker, water retainer, wetting agent or fertiliser tablets. If required, they will be added at the relevant time (i.e. in the hole prior to planting or upon watering-in plants).	During construction	EDC Management advice on 22 March 2021	Revegetation did not commence during this audit period.	NA
CRMP 24	Table 3 Detailed protocols for the collection and use of native seed Place plants in a hole that is approximately twice the size of the plant pot, ensuring the base of the plant is slightly below the original soil surface.	During construction	EDC Management advice on 22 March 2021	Revegetation did not commence during this audit period.	NA
CRMP 25	Table 3 Detailed protocols for the collection and use of native seed Fill soil around the plant ensuring it sits in a basin that is approximately 200-300 mm in diameter and 50 mm deep to provide adequate water capture. The base of the plant will be flush with the soil surface within the basin to prevent collar rot.	During construction	EDC Management advice on 22 March 2021	Revegetation did not commence during this audit period.	NA
CRMP 26	Table 3 Detailed protocols for the collection and use of native seed Water seedlings when planted as required.	During construction	EDC Management advice on 22 March 2021	Revegetation did not commence during this audit period.	NA

Ref	Action	Timing	Evidence	Comments	Conformance status
CRMP 27	Table 3 Detailed protocols for the collection and use of native seed Install stakes (10-12 mm diameter) and a protective guard (plastic) around the seedlings to protect the seedlings from rabbits (Note: protective guards are only required in areas outside rabbit-proof fencing).	During construction	EDC Management advice on 22 March 2021	Revegetation did not commence during this audit period.	NA
CRMP 28	Table 4 Performance indicators Utilise suitable native seed collected from within Carnaby's Cockatoo habitat proposed to be cleared in revegetation projects (including on-site degraded areas illustrated in Figure 3).	Revegetation	EDC Management advice on 22 March 2021	Revegetation did not commence during this audit period.	NA
CRMP 29	Table 4 Performance indicators Revegetate 0.38 ha of degraded land (Figure 3) so that native species richness and/or density are within 80% of the native species richness and/or density recorded in reference quadrats.	Revegetation	EDC Management advice on 22 March 2021	Revegetation did not commence during this audit period.	NA
CRMP 30	Table 4 Performance indicators Manage weeds in 0.38 ha of degraded land proposed to be revegetated so that weed species density and/or cover are not greater than 10% of the weed species density and/or cover recorded in reference quadrats, and to ensure that there is no addition of new weed species compared to the on-site reference site.	Revegetation	EDC Management advice on 22 March 2021	Revegetation did not commence during this audit period.	NA
CRMP 31	Table 4 Performance indicators On-site planting within the Project Area are to be planted with 50% of tree and shrub species being primary feeding plants for Carnaby's Cockatoo.	Revegetation	EDC Management advice on 29 March 2021	Revegetation in the Parks and Recreation areas is yet to commence and no POS or streetscapes were planted during this audit period. Notes It should be noted that POS/civic spaces referred to in the CRMP (revision 4, 2016) that has been assessed for compliance during this audit period has been updated CRMP (revision 7, December 2020) to remove reference to POS as per the variation to conditions of EPBC 2012/6631 issued on 26 October 2020 (Appendix A). The requirement to meet 50% requirement for tree and shrub species as feeding plants for Carnabys Cockatoo has been removed from CRMP Revision 7.	NA
CRMP 32	Table 5 Monitoring actions Monitor the proportion of native seed collected, used on-site and transferred to receiving party to ensure native seed collected from within Carnaby's Cockatoo habitat is used for revegetation.	Annually by 30 June during construction until the suitable native seed as per Table 3 is utilised on-site or transferred	EDC Management advice on 22 March 2021	Native seed has not been used on site. Note: the amount of seed collected has been recorded (refer to CRMP 6).	NA
CRMP 33	Table 5 Monitoring actions – On-site revegetation Monitor: integrity of temporary fencing to ensure no inadvertent clearing of areas to be retained. Location: On-site areas to be revegetated.	Daily during construction as part of construction area inspections	EDC Management advice on 22 March 2021	Revegetation did not commence during this audit period.	NA
CRMP 34	Table 5 Monitoring actions – On-site revegetation Monitor: Plant density, Species richness, Weed species density and Weed species richness to determine success of rehabilitation. Location: Monitoring quadrats in on-site revegetated areas.	Annually after planting/direct seeding (September - October) until achievement of targets as per Section 6	EDC Management advice on 22 March 2021	Revegetation planting and direct seeding did not commence during this audit period.	NA
CRMP 35	Table 5 Monitoring actions – On-site revegetation Record the number of suitable Carnaby's Cockatoo forage species in on-site planting to monitor the abundance of species suitable for future use of Carnaby's Cockatoo for food. Location: Review planting lists and orders for on-site planting.	Annually after planting/direct seeding (September - October) until achievement of targets as per Section 6	EDC Management advice on 22 March 2021	Revegetation planting and direct seeding did not commence during audit period.	NA
CRMP 36	Table 5 Monitoring actions Monitor the presence of feral animals to ensure there are no feral animals present within the on-site revegetated areas. Location: On-site revegetated areas.	Annually after planting/direct seeding (September - October) until achievement of targets as described in Section 6	EDC Management advice on 22 March 2021	Revegetation planting and direct seeding did not commence during audit period.	NA
CRMP 37	Table 7: Long term management and timeframes for implementation The CRMP will be implemented until the performance targets are achieved.	Until the performance targets outlined in Table 4 are achieved to the satisfaction of CoW	EDC Management advice on 22 March 2021	Most of the revegetation requirements in the CRMP did not commence during this audit period.	NA

Ref	Action	Timing	Evidence	Comments	Conformance status
CRMP 38	Table 7: Long term management and timeframes for implementation Retained habitat in Parks and Recreation Reserves will be the responsibility of WAPC.	WAPC will initiate the revestment order once Westminster has completed the works required under 10 (g) of the EPBC approval	R001_Strategen-JBS&G_Jindee ACR 2020_09042020	Parks and Recreation Reserves have been accordingly zoned under the MRS. A land exchange was completed in 2016 which transferred the ownership of the Parks and Recreation Reserves to WAPC. Works required under condition 10(g) have not yet commenced. Works outlined in Appendix 2 of CMP.	NA
CRMP 39	Table 7: Long term management and timeframes for implementation Retained habitat in Parks and Recreation Reserves will be vested as Parks and Recreation Reserves as part of the MRS amendment.	During construction	EDC Management advice on 22 March 2021	Refer to CRMP 38	NA
CRMP 40	Table 7: Long term management and timeframes for implementation The CRMP will be implemented by Westminster until the performance targets outlined in Table 4 are achieved and areas have been handed over following the completion of developer maintenance period.	Until the performance targets outlined in Table 4 are achieved and areas have been handed over	EDC Management advice on 22 March 2021	Most of the revegetation requirements in the CRMP did not commence during audit period	NA
CRMP 41	Table 7: Long term management and timeframes for implementation Areas will be handed over at the time the POS and Civic space land titles are created.	At the time the POS and civic space land titles are created	EDC Management advice on 22 March 2021	Land titles for POS and Civic spaces have not been created.	NA
CRMP 42	<i>Removed.</i>				
CRMP 43	<i>Removed.</i>				
CRMP 44	<i>Removed.</i>				


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