

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

29 April 2022

60521/136,375 (Rev 0)

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

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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; and Appendix A) and the related environmental management plans.

This ACR (2022) 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 2021 to 3 February 2022.

1.1 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 (Estates Development Company), 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; formerly known as Department of the Environment (DotE)) on 16 November 2012 and conditionally approved under EPBC 2012/6631 on 18 July 2013, under Section 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 2021 to 3 February 2022) included:

- Selling of lots and ongoing construction of housing in Stage 1 & Stage 5 (Release 2).
- Construction of lots in Release 3 North (old Stage 2) commenced in June 2021.
- Fauna trapping and salvage as per Fauna management requirements from the Flora & Fauna Management Plan (Strategen, 2015) in June 2021 and October 2021 for Release 3 North (old Stage 2).
- Dust monitoring during Release 3 North (old Stage 2) construction works.
- Fire break maintenance.
- Weed and pest inspection was undertaken on two occasions in Spring 2021 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 (Rev 8) and the CRMP (Rev 7), with the change of lot identification numbers, were approved by the Minister on 17 February 2021.

3. Audit Methodology

3.1 Audit Plan

3.1.1 Purpose & 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 (2022) addresses the audit period between 4 February 2021 and 3 February 2022 for the conditions of EPBC 2012/6631 and implementation of the CMP (Rev 8, Strategen 2021a) and CRMP (Rev 7, Strategen 2021b), required by Condition(s) 10 and 12 of EPBC 2012/6631, respectively.

3.1.2 Methodology

A desktop audit was undertaken by lead environmental auditor Andrew Winzer, the findings of which were used to prepare this ACR (2022). The desktop audit involved consultation with Fred Ferrante, Project Manager from Estates Development Company. 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
Fred Ferrante (Project Manager)	Estates Development Company	To obtain verifiable evidence to assist in determining compliance with EPC 2012/6631.
Jack Wilson (Project Manager)	Tranen Revegetation Systems	To provide evidence in relation to weed and pest inspections.

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 3.3).

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.

Status	Acronym	Description
Not applicable	NA	The requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.
Management Plans		
Conformant	C	Sufficient evidence is required to confirm that the requirements of the procedures, programs and/or management actions detailed within an Environmental Management Plan or similar document have been satisfactorily met.
Potentially conformant non-	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 '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):

- 32 were found to be 'Conformant', with three of those identified as 'Complete'
- 14 were found to be 'Not applicable'
- none were found to be 'Potentially Non-conformant'

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 '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)

Reference	Condition	Evidence	Comment	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_JBSG_Jindee_ACR_2021_23042022	Item assessed as Completed during the previous audit period (R001).	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 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 publicized through the general media.	All evidence utilized to inform this ACR; and Refer to other items in this table and/or appendices.	Accurate records for all applicable conditions have been maintained and were available during the audit.	Compliant
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.	R001_JBSG_Jindee_ACR_2021_23042022; C001_Jindee_ACR_DAW_2021_04052021 W001_Jindee_ACR_Website_2021_28022022	The ACR (R001) was prepared and published on the Jindee website on 23 April 2020, within three months of the 12-month anniversary of commencement (4 February). The ACR (R001) is available on the Jindee website and sighted by the auditor on 28 February 2022 (W001).	Compliant
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_Jindee_ACR_DAW_2021_04052021	Documentary evidence of publication was submitted to DAWE on 4 May 2021 (C001).	Compliant
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.	Estates Development Company Management Advice (22 March 2021)	No 'Potential Non-compliances' were identified during the 2021 audit period.	Compliant
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.	Estates Development Company Management Advice (22 March 2022)	Westminster Estates Pty Ltd was not directed to conduct an independent audit during the 2021 audit period.	Not Applicable
EPBC 4-2	The independent auditor must be approved by the Minister prior to the commencement of the audit.		Refer to EPBC 4-1	Not Applicable
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.		Refer to EPBC 4-1	Not Applicable
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 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.	R002_JBSG_Jindee_CMP_Rev 8_09122020; R003_JBSG_Jindee_CRMP_Rev 7_09122020; C002_DAW_2021_JindeeCMP_Approval Letter_17022021; and C003_CRMP_DAW_2021_17022021	The CMP (R002) and CRMP (R003) submitted to the Department for review on 9 December 2020. Approval for the revised plan(s) was granted by the department on 17 February 2021 (C002; C003).	Compliant
EPBC 5-2	SA 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.	Not Applicable	Refer to EPBC 5-1	Not Applicable

Reference	Condition	Evidence	Comment	Status
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: <ol style="list-style-type: none"> Notify the Department in writing that the approved action management plan has been revised and provide the Department with: <ol style="list-style-type: none"> an electronic copy of the RAMP; an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP; an explanation of the differences between the approved action management plan and the RAMP; 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 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. Subject to condition 5D, implement the RAMP from the RAMP implementation date. 	Not Applicable	Refer to EPBC 5-1	Not Applicable
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.	Not Applicable	Refer to EPBC 5-1	
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: <ol style="list-style-type: none"> Condition 5A does not apply, or ceases to apply, in relation to the RAMP; and The approval holder must implement the action management plan specified by the Minister in the notice. 	Not Applicable	Refer to EPBC 5-1	
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.	R002_Jindee_CMP_17022021; R003_Jindee_CRMP_17022021; W002_Jindee_CMP_17022021; and W003_Jindee_CRMP_17022021	The CMP (R002) and CRMP (R003) submitted to the Department for review on 9 December 2020. The Jindee website was updated to show to revised management plans (W002; and W003) on the 17 February 2021.	Compliant
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_JBSG_Jindee_ACR_2021_23042022	Refer to EPBC 1; The action substantially commenced on 4 February 2015, within five years of the date of the approval. This item was assessed as 'Completed' during the 2020 audit period.	Completed
EPBC 9	To mitigate impacts to Carnaby's Black-Cockatoo (<i>Calyptrorhynchus latirostris</i>): <ol style="list-style-type: none"> 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; Clearing of Carnaby's Black-Cockatoo habitat in the areas shaded blue at Attachment A1 must not exceed 40.57 hectares; and 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. 	Estates Development Company Management advice on 23 March 2022	Management advised that no clearing was undertaken in these areas during the 2021 reporting period.	Compliant

Reference	Condition	Evidence	Comment	Status
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: <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, 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. 	R002_Jindee_CMP_17022021; C002_CMP_DAW_17022021; and W002_Jindee_CMP_17022021	The CMP (R002) was revised and reapproved by a delegate of the Minister on CMP, and contains the commitments as required, and is made available on the Jindee website 17 February 2021 (C002; and W002).	Complaint
EPBC 10-2	If the Minister approves the plan, the approved plan must be implemented.	Refer to Appendix B	The key actions of the CMP (Revision 8) were assessed during this audit period, and it was found that the CMP is being implemented. Of the 46 key actions: <ul style="list-style-type: none"> • 32 were 'Conformant,' of those 3 were 'Completed' • 14 were 'Not applicable' at time of audit; and • None were 'Potentially Non-conformant' at time of audit. Refer to Appendix B for further details. The auditor has determined that the CMP is being implemented and this condition of EPBC 2012/6631 is compliant. Several recommendations were made during the audit and are presented in Appendix B.	Complaint
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 Attachment B, have been granted to the City of Wanneroo for the purpose of conservation.	R001_JBSG_Jindee_ACR_2021_23042022	Estates Development Company 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. Strategen (now Strategen-JBS&G; on behalf of Westminster Estates) requested completion of the condition.	Compliant
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: <ul style="list-style-type: none"> a. 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; 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 collection and use of native seed required by condition 12 (a) and 12 (b) including: <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 utilise the native seed resource for revegetation; iii. how native seed will be stored and transported; and iv. onsite supervision and implementation monitoring mechanisms. 	R003_JBSG_Jindee_CRMP_Rev 7_09122020; W003_Jindee_CRMP_17022021	The CRMP (R003) was revised and reapproved by a delegate of the Minister on CMP, and contains the commitments as required, and is made available on the Jindee website 17 February 2021 (C003; and W003).	Compliant
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.	Compliant
EPBC 13	The person taking the action must not undertake any clearing of habitat for Carnaby's Black-Cockatoo on the proposal site unless: <ul style="list-style-type: none"> a. The Conservation Management Plan required under Condition 10 has been approved by the Minister; and b. The Clearing and Revegetation Management Plan required under Condition 12 has been approved by the Minister. 	R001_JBSG_Jindee_ACR_2021_23042022	Item assessed as 'Completed' during the 2020 audit period. The CMP (Rev 4) and CRMP (Rev 4) 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.	Completed

Reference	Condition	Evidence	Comment	Status
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 (Attachment C).	R001_JBSG_Jindee_ACR_2021_23042022	Item assessed as 'Completed' during a previous audit period, prior to construction commencing. Strategen (now trading as Strategen-JBS&G), on behalf of Westminster Estates Pty Ltd, provided the DEE with written evidence of the provision of the required funds to WA Department of Parks and Wildlife) (now known as Department of Biodiversity, Conservation and Attractions) on 6 January 2015.	Completed
EPBC 14-2	The written evidence must be accompanied with the offset attributes and shapefile.	R001_JBSG_Jindee_ACR_2021_23042022	Item assessed as 'Completed' during the 2019 audit period.	Completed
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_JBSG_Jindee_ACR_2021_23042022	This condition was added to the approval on 7 April 2016; Written evidence of provision of funds to WA Department of Parks and Wildlife) (now known as Department of Biodiversity, Conservation and Attractions) along with offsets attributes and spatial data were provided to the Minister on 2 June 2016 prior to any clearing of 2.88 ha of Carnaby's Black-Cockatoo habitat referred to Condition 9(a).	Completed
EPBC 16	<p>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; 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; <p>OR</p> <p>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.</p>	EDC Management advice 24 April 2022	Estates Development Company 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. An ecological survey of the site occurred in March 2022 which will be sent to State and Commonwealth authorities. Following agreement on the report findings, funds will then be to DBCA to enable purchase of the property.	Compliant
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 24 April 2022	Estates Development Company 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 Department of Biodiversity, Conservation and Attractions for the purchase of a second offset property.	Compliant

5. New Environmental Risks

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; and/or
- 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.

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7. References

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

Strategen 2021a, *Jindee Innovation Project Conservation Management Plan* (Rev 8), prepared for Westminster Estates Pty Ltd by Strategen, December 2020

Strategen 2021b, *Jindee Innovation Project Clearing and Revegetation Management Plan* (Rev 7), prepared for Westminster Estates Pty Ltd by Strategen, December 2020

Appendix A EPBC Approval 2012/6631

Appendix B Conservation Management Plan Audit Findings

Table B.1: Conservation Management Plan (Revision 8) Audit Findings

Reference	Condition	Timing	Evidence	Comment	Status
CMP 1	Section 3.1 Westminster will implement works funded to the order of \$393 000 (excluding 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 constructions	Estates Development Company Management Advice (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.	Completed
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_JBSG_Jindee_ACR_2021_23042022	A land exchange was completed in 2016 which transferred the ownership of the Parks and Recreation Reserves to WAPC. The certificate of titles for the Parks and Recreation Reserves, were issued in May 2016.	Completed
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); and • Infill planting/seeding and weed control of areas to be revegetated as per the Clearing and Revegetation Management Plan and Table 3. 	During constructions	Estates Development Company Management Advice (22 March 2021)	Apart from fencing to prevent unauthorized access and fire breaks around the whole site, works in the Parks and Recreation Reserves have not yet commenced and are not yet required.	Compliant
CMP 4	Table 3.1: Management Measures for the Parks and Recreation Reserves Carnaby's Black-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 (29 March 2021); P029_ROS Temporary Fencing_1_290302021; and P031_ROS Temporary Fencing_2_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 Black-Cockatoo habitat (ROS) was sighted by the auditor during the site inspection on 29 March 2021 (P029, and P031).	Compliant
CMP 5	Table 3.1: 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_17032020	Stantec Australia Pty Ltd (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 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.	Compliant
CMP 6	Table 3.1: 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 (29 March 2021); P027_ROS Access Point_29032022; P029_ROS Temporary Fencing_1_290302021; and P031_ROS Temporary Fencing_2_29032022	Temporary fencing and appropriate barriers around Carnaby's Black-Cockatoo habitat (ROS) were sighted by the auditor during the site inspection on 29 March 2021.	Complaint
CMP 7	Table 3.1: 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	P003_POS_Northern Access Point_29032021; and P027_ROS Access Point_29032021;	Appropriate access points have been installed around the Parks and Recreation Reserves (ROS) and adjacent to the northern POS area, and single gates will be installed during future development works.	Compliant
CMP 8	Table 3.1: Management Measures for the Parks and Recreation Reserves Stabilized gravel path and limestone bollards will be installed within the Parks and Recreation Reserve to ensure controlled public use.	During construction	Estates Development Company Management Advice (22 March 2021); and C003_Jindee_BMP for Stage 5_31092020	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's 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.	Compliant
CMP 9	Table 3.1: Management Measures for the Parks and Recreation Reserves Gravel fire access tracks will be constructed in accordance with the Fire Management Plan.	During construction	Estates Development Company Management Advice (22 March 2021)	Refer to CMP 8	Compliant

Reference	Condition	Timing	Evidence	Comment	Status
CMP 10	Table 3.1: 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.	During construction	Estates Development Company Management Advice (22 March 2021); and C003_Jindee_BMP for Stage 5_31092020	Management advised that a fire break has been installed around the whole site as per the relevant Bushfire Management Plans (BMP). The 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). 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. 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).	Compliant
CMP 11	Condition 11 was removed upon variation and reapproval of Revision 8 of the CMP				
CMP 12	Table 3.1: 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	Estates Development Company Management Advice (22 March 2022)	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. It should be noted that initial monitoring for percent weed cover is scheduled for “during construction” in the CRMP (refer to CRMP 9).	Compliant
CMP 13	Table 3: Management Measures for the Parks and Recreation Reserves Implement weed control	As determined by CMP 12 and CRMP	Estates Development Company Management Advice (22 March 2022)	Refer to CMP 12.	Compliant
CMP 14	Table 3.1: Management Measures for the Parks and Recreation Reserves Monitor weed control results and implement further control if required as described in the CRMP.	As per CRMP	Estates Development Company Management Advice (22 March 2022)	Refer to CMP 12.	Compliant
CMP 15	Table 3.1: Management Measures for the Parks and Recreation Reserves All vehicles, machinery and equipment will be free of mud and soil.	Upon entry into POS and/or ROS	Estates Development Company Management Advice (22 March 2022)	No authorised vehicles or machinery entered the Parks and Recreation reserves during the audit period.	Compliant
CMP 16	Table 3.1: 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	R001_JBSG_Jindee_ACR_2021_23042022; and C003_Jindee_BMP for Stage 5_31092020	Monitoring for pest fauna in the central and eastern POS was undertaken in Spring 2021. The report recommended that monitoring for pests should be continued at the site; however, no pest/control removal measures were recommended (similar to Spring 2020 pest survey results).	Compliant
CMP 17	Table 3.2: Management Measures for Delineating Areas to be Retained Carnaby's Black-Cockatoo habitat being retained will be delineated by survey along clearing boundaries and protected by the installation of temporary fencing in areas adjacent to construction activity, or survey pegs and flagging tape where construction activity is not occurring.	Prior to clearing		Management advised no clearing was undertaken during the 2021 reporting period	Compliant
CMP 18	Table 3.2: Management Measures for Delineating Areas to be Retained Temporary signage will be installed in accordance with the City of Wanneroo's standard signage policy to restrict construction workers from entering Carnaby's Black-Cockatoo habitat being retained.	Prior to clearing		Management advised no clearing was undertaken during the 2021 reporting period.	Compliant
CMP 19	Table 3.2: Management Measures for Delineating Areas to be Retained GPS coordinates 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		Management advised no clearing was undertaken during the 2021 reporting period.	Compliant
CMP 20	Table 3.2: Management Measures for Delineating Areas to be Retained Appropriate barriers to prevent pedestrian access such as fencing 'will be installed around the perimeter of ROS areas or retained habitat within the City of Wanneroo's specifications designed to prevent public access.	During construction	Site inspection (29 March 2021); R001_JBSG_Jindee_ACR_2021_23042022; P004_Northern POS Temporary Fencing_29032021; P006_Eastern POS Temporary Fencing_29032021; and P021_Central POS Temporary Fencing_29032021	As per CMP 17, three (3) POS areas were delineated in a previous audit period 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.	Compliant

Reference	Condition	Timing	Evidence	Comment	Status
CMP 21	Table 3.2: Management Measures for Delineating Areas to be Retained Access points will be installed at strategic locations in the ROS areas to the City of Wanneroo's requirements.	During construction	Site inspection (29 March 2021); and P003_Access Point Northern POS_29032021;	Strategic access points have been installed around the POS areas (P003).	Compliant
CMP 22	Table 3.2: 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; and The requirement for dogs to be on a lead in designated areas. 	During construction	Estates Development Company Management Advice (22 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.	Compliant
CMP 23	Condition 23 was removed upon variation and reapproval of Revision 8 of the CMP				
CMP 24	Condition 24 was removed upon variation and reapproval of Revision 8 of the CMP				
CMP 25	Table 3.3: Management Measures for Erosion and Dust Control Measures During Construction Cleared areas and any dry, dust-prone areas or stockpiles will be stabilized to prevent dust generation. Stabilization methods may include wetting (through use of water trucks), application of hydro-mulch, use of chemical polymers (if required) or other sealing material.	During construction	Estates Development Company Management Advice (22 March 2021); Site inspection (29 March 2021); and R011_Jindee_Stage 5 Site Audit_31092020; and R014_Croker_Jindee_Stage 5_PMP 953 (Rev 1) (no date)	Management confirmed water carts were used for dust suppression during Stage 5 construction works and the application of hydro-mulch to cleared areas was observed by the 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. The Croker Construction Project Management Plan (PMP) for Stage 5 works also details the dust minimisation and management measures to be implemented during clearing and construction works.	Compliant
CMP 26	Table 3.3: Management Measures for Erosion and Dust Control Measures During Construction Vehicle speeds will be restricted to 40 km per hour to minimize dust generation on designated roads, access tracks and within construction areas.	During construction	Site inspection (29 March 2021); R008_JBSG_Stage 5 Jindee Environmental Induction_22032021; R009_JBSG_Stage 5 Jindee Environment Induction Register_31042020; and P027_ROS and Access Point _29032021	Croker Construction (WA) Pty Ltd completed an environmental induction for clearing of Stage 5 between April and August 2020. The induction included restriction of vehicle speeds to 40 km per hour 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 per hour.	
CMP 27	Table 3.4: Weed Management Measures Identify weeds occurring in retained habitat in POS.	Annual	R010_Jindee_Weed and Pest Survey Spring (2020)_06042021 R016_Tranen_Jindee_Weed Control_210806; and R017_Tranen_Jindee_Weed Control_2111021	Strategen-JBS&G undertook a weed assessment survey Spring 2020 in the central and eastern POS areas. 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 <i>"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."</i> Subcontractor completed rubbish collection and weed control works in 2021 for pest management purposes on 20 October 2021	Compliant
CMP 28	Table 3.4: Weed Management Measures Determine appropriate method and timing of weed control in consultation with a suitably qualified specialist.	Annual	R010_Jindee_Weed and Pest Survey Spring (2020)_06042021; R011_Jindee_Stage 5 Site Audit_31092020; and C005_Tranen_Weed Control_20102021	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 fence lines, to minimise ingress of weed seeds and propagules. During the 2021 audit period, Stage 5 construction works were undertaken adjacent to the eastern and central POS areas; therefore, weed control was identified as needing to be commenced. Weed control was undertaken on 5-6 August and 20 October 2021. Weed control will continue to be implemented by the Estates Development Company until the POS area is handed over to the City of Wanneroo for management.	

Reference	Condition	Timing	Evidence	Comment	Status
CMP 29	Table 3.4: Weed Management Measures Implement weed control.	Annual	R010_JBSG_Jindee_Weed and Pest Survey Spring (2020)_06042021; R011_Jindee_Stage 5 Site Audit_31092020; and C005_Tranen_Weed Control_20102021	Refer to CMP 28.	Compliant
CMP 30	Table 3.4: Weed Management Measures Monitor weed control results and implement further control if required, on the advice of the City of Wanneroo (e.g., bushland management personnel) or suitably qualified specialist, etc.).	Annual	C005_Tranen_Weed Control_20102021	Refer to CMP 28.	Compliant
CMP 31	Table 3.5: Pathogen Management Measures All construction personnel will be inducted in relation to dieback risk, potential impacts, and management.	During construction	Site inspection (29 March 2021)	Management advised that no clearing was undertaken in these areas during the 2021 audit period. Furthermore, access to construction sites is now via sealed roads; therefore, equipment, machinery and/or vehicles would pose no risk to the receiving environment.	Compliant
CMP 32	Table 3.5: Pathogen Management Measures All vehicles, machinery and equipment will be free of mud and soil.	Upon arrival/entry into POS/ROS site(s)	Site inspection (29 March 2021)	Refer to CMP 31	Not applicable
CMP 33	Table 3.6: Fire Management Measures A Fire Management Plan will be prepared as required in accordance with the City of Wanneroo's standard operating procedures.	Pre-construction	R006_JBSG_Jindee_ BMP Compliance Stage 5 Release 2 (Rev 0)_31072020	The City of Wanneroo approved the Jindee Fire Management Plan (FMP) on 9 July 2015 for the first four stages. The Stage 5 BMP Compliance Report was approved in July 2020.	
CMP 34	Table 3.6: 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	Estates Development Company Management Advice (29 March 2021); and C003_Jindee_BMP for Stage 5_31092020	Refer to CMP 10	Compliant
CMP 35	Table 3.6: Fire Management Measures A reticulated water supply will be extended throughout the subdivision area to all proposed lots.	During construction	Estates Development Company Management Advice (29 March 2021)	Management advised that a reticulated water supply and hydrants were supplied to all lots in Stage 1 and 5 subdivisions.	Compliant
CMP 36	Condition 36 was removed upon variation and reapproval of Revision 8 of the CMP				
CMP 37	Table 3.7: Introduced Fauna 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	R001_JBSG_Jindee_ACR_2021_23042022; and R010_Jindee_Weed and Pest Survey Spring (2020)_06042021	Refer to CMP 16; and Monitoring for pest fauna in the central and eastern POS was undertaken in Spring 2020. 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.	Compliant
CMP 38	Table 3.7: Introduced Fauna 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 postconstruction	Estates Development Company Management Advice (29 March 2021)	Permanent signage was not required as there is no authorised public access during the 2021 audit period.	Compliant
CMP 39	Table 4.1 Monitoring Actions – Parks & Recreation ROS Spaces Monitor the condition of infrastructure delineating Carnaby's Black-Cockatoo habitat (e.g., fencing, gates, pathways, signage, etc.) to ensure infrastructure is in good condition and that there has been no unauthorized clearing beyond the barrier and that habitat has been retained near clearing boundaries.	Quarterly during construction	Site inspection (29 March 2021); R001_JBSG_Jindee_ACR_2021_23042022; P004_Northern POS Temporary Fencing_29032021; P006_Eastern POS Temporary Fencing_29032021; and P021_Central POS Temporary Fencing_29032021	Refer CMP 17	Compliant
CMP 40	Table 4.1 Monitoring Actions – Parks & Recreation ROS Spaces Visual observations of dust generation and erosion to minimize erosion and dust impacts from construction on retained habitat, including unsealed surfaces prone to dust generation (e.g., roads, stockpiles, etc.).	Opportunistically during construction	R011_JBSG_Jindee_Stage 5 Site Audit_31092020	As per CMP 25, dust control during Stage 5 works included the use of water carts, dust monitoring and application of hydro-mulch to cleared areas.	Compliant

Reference	Condition	Timing	Evidence	Comment	Status
CMP 41	Table 4.1 Monitoring Actions – Parks & Recreation ROS Spaces Monitor dust suppression actions and/or equipment to minimize erosion and dust impacts from construction on retained habitat where potential dust generation is taking place.	Opportunistically during construction		Refer to CMP 25	Compliant
CMP 42	Table 4.1 Monitoring Actions – Parks & Recreation ROS Spaces Visual observation of vegetation health, including dust smothering and erosion to minimize erosion and dust impacts from construction on retained habitat, including retained Carnaby's Black-Cockatoo habitat beyond clearing boundaries.	Opportunistically during construction	R011_JBSG_Jindee_Stage 5 Site Audit_31092020;	No evidence of dust smothering or erosion in the Parks & Recreation POS 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 Croker Construction (WA) Pty Ltd, with no issues identified. 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 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.	Compliant
CMP 43	Table 4.1 Monitoring Actions – Parks & Recreation ROS Spaces Inspection of machinery for construction works to ensure appropriate <i>Phytophthora</i> dieback hygiene are being undertaken at the authorized access points into the site.	Upon initial entry and opportunistically during construction.	R007_Croker_Jindee_Stage 5 Vehicle Washdown Report_2020; R008_JBSG_Stage 5 Jindee Environmental Induction; and R009_JBSG_Stage 5 Jindee Environment Induction Register_31042020	Refer to CMP 32; No vehicles or machinery on site at the time of the audit. Croker Construction (WA) Pty Ltd provided a copy of their washdown register for machinery and plant to be washed down prior to entering site for Stage 5 construction works. Croker Construction (WA) Pty Ltd completed an environmental induction prior to Stage 5 works which covered <i>phytophthora</i> dieback risk and management. An induction register was also provided. Pres-start checks showed that that <i>phytophthora</i> dieback protection measures include personnel signing off on all plant are clean prior to entering the site.	Compliant
CMP 44	Table 4.1 Monitoring Actions – Parks & Recreation ROS Spaces Monitor the presence of introduced animals (foxes, rabbits, and/or feral cats) within retained Carnaby's Black-Cockatoo habitat in POS until handover to determine their presence within the retained habitat, and whether fauna control is required.	Annually in Spring and opportunistically	R010_JBSG_Jindee_Weed and Pest Spring Survey_06042021	Refer CMP 16 and CMP 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.	Compliant
CMP 45	Table 4.1 Monitoring Actions – Parks & Recreation ROS Spaces Monitor the presence of Carnaby's Black-Cockatoo (as indicated by sightings, evidence of foraging, etc.) within retained Carnaby's Black-Cockatoo habitat in POS until handover to determine presence of Carnaby's Black-Cockatoo within the retained habitat.	Opportunistically	Site inspection (29 March 2021); P001_Croker_CBC Sightings 1_31082020; and P001_Croker_CBC Sightings 2_31082020	There were no opportunistic sightings of Carnaby's Black-Cockatoo during the site inspection on 29 March 2021. Opportunistic sightings of Carnaby's Black-Cockatoo were photographed during the Stage 5 construction works by Croker Construction (WA) Pty Ltd.	Compliant
CMP 46	Table 6.1: Long-term Management and Timeframes for Implementation Retained habitat in Parks and Recreation Reserves will be managed by Estates Development Company via Westminster Estates Pty Ltd until completion of construction.	Until completion of construction adjacent to the reserves and completion of CRMP commitments; and The formal transfer of management responsibility to the City of Wanneroo will be the responsibility of WAPC.	R001_JBSG_Jindee_ACR_2021_23042022	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.	Compliant
CMP 47	Table 6.1: Long-term Management and Timeframes for Implementation Retained habitat in Parks and Recreation Reserves will be the responsibility of Western Australian Planning Commission (WAPC).	WAPC will initiate the re-vestment order once Estates Development Company via Westminster Estates Pty Ltd has completed the works required under 10(g) of the EPBC approval.	R001_JBSG_Jindee_ACR_2021_23042022	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.	Compliant
CMP 48	Table 6.1: 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 Metropolitan Region Scheme amendment.	During construction	R001_JBSG_Jindee_ACR_2021_23042022	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 City of Wanneroo.	Completed

Reference	Condition	Timing	Evidence	Comment	Status
CMP 49	Table 6.1: Long-term Management and Timeframes for Implementation The CMP will be implemented in POS and civic spaces by Estates Development Company via Westminster Estates Pty Ltd until handed over following the completion of developer maintenance period.	During construction	Estates Development Company Management Advice (29 March 2021); and Site inspection (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.	Compliant
CMP 50	Table 6.1: 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.	The handover will occur at the time the POS and civic space land titles are created.	R001_JBSG_Jindee_ACR_2021_23042022	Land titles of POS areas and civic spaces have not yet been created.	Compliant
CMP 51	Condition 51 was removed upon variation and reapproval of Revision 8 of the CMP				
CMP 52	Condition 52 was removed upon variation and reapproval of Revision 8 of the CMP				
CMP 53	Condition 53 was removed upon variation and reapproval of Revision 8 of the CMP				

Appendix C Clearing and Revegetation Management Plan Audit Findings

Table C.1: Clearing and Revegetation Management Plan (Revision 7) Audit Findings

Reference	Condition	Timing	Evidence	Comment	Status
CRMP 1	Section 3.2: Detailed Protocols for the Collection and Use of Native Seed There is approximately 0.75 ha of degraded habitat that has been identified within the Proposal site. Some of these degraded areas are not proposed to be revegetated as they are proposed to be used in the creation of formal pedestrian pathways (up to 3 m wide) and associated recreational infrastructure (such as an observation deck and seating).	Revegetation	Estates Development Company Management Advice (22 March 2021); and R001_JBSG_Jindee_ACR_2021_23042021	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.	Compliant
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	Estates Development Company 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.	Not applicable
CRMP 3	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will 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_JBSG_Jindee_ACR_2021_23042021	Tranen provided a quote for seed collection, processing and storage and was subsequently engaged to undertake the quoted tasks in a previous audit period.	Completed
CRMP 4	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will undertake seed collection in designated areas of Carnaby's Black-Cockatoo habitat proposed to be cleared.	Pre-construction	R001_JBSG_Jindee_ACR_2021_23042021	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). Based on this, no more seed needs to be collected.	Completed
CRMP 5	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will ensure seed for on-site revegetation plus any off-site use is stored and transported in accordance with Revegetation Industry of Western Australia (RIAWA) standards to ensure seed viability.	Pre/during construction	R001_JBSG_Jindee_ACR_2021_23042021	Quote for seed collection services from Tranen and company brochure states that all seed services are compliant with RIAWA guidelines.	Compliant
CRMP 6	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will monitor native seed and maintain a register of volumes, species collected, locations and quantities.	Pre-construction	R001_JBSG_Jindee_ACR_2021_23042021	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.	Compliant
CRMP 7	Table 3.1: 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	Estates Development Company Management Advice (22 March 2021)	Seeds have not yet been utilised and are in storage. Revegetation has not commenced.	Not applicable
CRMP 8	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will select on-site reference sites containing landforms and vegetation comparable (or likely to have been comparable) to those areas proposed to be revegetated.	Pre/during construction	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence during this audit period, as such, selection of reference sites was not required during this audit period.	Not applicable
CRMP 9	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will survey the onsite reference sites to determine indicator species, density of native species, percent cover of native species, native species richness and percent weed cover.	Pre/during construction	Estates Development Company Management Advice (22 March 2021)	Refer to CRM 8.	Not applicable
CRMP 10	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will determine success criteria for revegetation sites based on the survey of the reference sites.	During construction	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence, and reference sites were not surveyed during this audit period.	Not applicable
CRMP 11	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will provide temporary barriers to prevent pedestrian access; such as fencing, and signage around degraded areas identified for revegetation.	During construction	Estates Development Company Management Advice (22 March 2021); Site inspection (29 March 2021); P004_Northern POS Temporary Fencing_29032021; P015_Eastern POS Temporary Fencing_29032021; P020_Central POS Signage_29032021; and P029_ROS Temporary Fencing_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 and part of the eastern ROS.	Compliant
CRMP 12	Table 3.1: Detailed protocols for the collection and use of native seed The Proponent will undertake weed control as required at the revegetation site until targets are achieved.	During construction	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence during the 2021 audit period.	Not applicable

Reference	Condition	Timing	Evidence	Comment	Status
CRMP 13	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed Primary feeding plants for the Carnaby's Black-Cockatoo will not be planted by the Proponent along roads with speed limits exceeding 50 km per hour (to minimise the risk to Carnaby's Black-Cockatoo).	During construction	Estates Development Company Management Advice (22 March 2021)	Planting of street scapes from native seed did not commence during the 2021 audit period.	Not applicable
CRMP 14	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will determine the quantity of seed of various native flora species required for broadcasting within on-site revegetation areas.	During construction	R001_JBSG_jindee_ACR_2021_23042021	Seed collection was completed during a previous audit period. Refer to CRMP 6.	Completed
CRMP 15	Table 3.1: 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	Estates Development Company Management Advice (22 March 2021)	Direct seeding did not commence during the 2021 audit period.	Not applicable
CRMP 16	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will undertake seed viability and germination testing if deemed necessary.	During construction	Estates Development Company Management Advice (22 March 2021)	Direct seeding did not commence during the 2021 audit period.	Not applicable
CRMP 17	Table 3.1: 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	Estates Development Company Management Advice (22 March 2021)	Direct seeding did not commence during the 2021 audit period.	Not applicable
CRMP 18	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The treated seed should be combined with an appropriate medium (e.g., yellow sand, vermiculite, etc.) and manually distributed (i.e., broadcast by hand) by an experienced operator, ensuring an even coverage over the whole area.	During construction	Estates Development Company Management Advice (22 March 2021)	Direct seeding did not commence during the 2021 audit period.	Not applicable
CRMP 19	Table 3.1: 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	Estates Development Company Management Advice (22 March 2021); and R001_JBSG_jindee_ACR_2021_23042021	Revegetation did not commence during the 2021 audit period; therefore, the propagation of seedlings was not required. Tranen have previously advised that the quantity of seed collected is sufficient for revegetation purposes.	Not applicable
CRMP 20	Table 3.1: 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	Estates Development Company Management Advice (22 March 2021)	Refer to CRMP 19.	Not applicable
CRMP 21	Table 3.1: 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	Estates Development Company Management Advice (22 March 2021)	Refer to CRMP 19.	Not applicable
CRMP 22	Table 3.1: 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	Estates Development Company Management Advice (22 March 2021)	Refer to CRMP 19.	Not applicable
CRMP 23	Table 3.1: 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	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence during the 2021 audit period.	Not applicable
CRMP 24	Table 3.1: 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	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence during the 2021 audit period.	Not applicable
CRMP 25	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will fill soil around the plant ensuring it sits in a basin that is approximately 200 to 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	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence during the 2021 audit period.	Not applicable
CRMP 26	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will water seedlings when planted as required.	During construction	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence during the 2021 audit period.	Not applicable
CRMP 27	Table 3.1: Detailed Protocols for the Collection and Use of Native Seed The Proponent will install stakes (10 to 12 mm diameter) and a protective guard (plastic) around the seedlings to protect the seedlings from rabbits.	During construction	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence during the 2021 audit period.	Not applicable
CRMP 28	Table 4.1: Targets and Indicators The Proponent will utilise suitable native seed collected from within Carnaby's Black-Cockatoo habitat proposed to be cleared in revegetation projects (including on-site degraded areas).	Revegetation	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence during the 2021 audit period.	Not applicable

Reference	Condition	Timing	Evidence	Comment	Status
CRMP 29	Table 4.1: Targets and Indicators The Proponent will revegetate 0.38 ha of degraded land so that native species richness and/or density are within 80% of the native species richness and/or density recorded in reference quadrats.	Revegetation	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence during the 2021 audit period.	Not applicable
CRMP 30	Table 4.1: Targets and Indicators The Proponent will 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	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence during the 2021 audit period.	Not applicable
CRMP 31	Condition 31 was removed upon variation and reapproval of Revision 7 of the CRMP				
CRMP 32	Table 4.2: Monitoring Program – Seed Collection and Use The Proponent will monitor the proportion of native seed collected, used on-site and transferred to receiving party to ensure native seed collected from within Carnaby's Black-Cockatoo habitat is used for revegetation.	Annually by 30 June during construction until the suitable native seed utilised on-site or transferred	Estates Development Company Management Advice (22 March 2021)	Native seed has not been used on site during the 2021 audit period. The number of seed collected has been recorded (refer to CRMP 6).	Not applicable
CRMP 33	Table 4.2: Monitoring Program – On-site Revegetation The Proponent will monitor the integrity of temporary fencing to ensure no inadvertent clearing of areas to be retained.	Daily during construction as part of construction area inspections	Estates Development Company Management Advice (22 March 2021)	Revegetation did not commence during the 2021 audit period.	Not applicable
CRMP 34	Table 4.2: Monitoring Program – On-site Revegetation The Proponent will monitor plant density, species richness, weed species density and weed species richness to determine success of rehabilitation. Monitoring will be undertaken via quadrats in on-site revegetated areas.	Annually after planting/direct seeding (September to October) until achievement of performance targets.	Estates Development Company Management Advice (22 March 2021)	Revegetation planting and direct seeding did not commence during the 2021 audit period.	Not applicable
CRMP 35	Table 4.2: Monitoring Program – On-site Revegetation The Proponent will record the number of suitable Carnaby's Black-Cockatoo foraging species in on-site planting to monitor the abundance of species suitable for future use of Carnaby's Black-Cockatoo for food.	Annually after planting/direct seeding (September to October) until achievement of performance targets.	Estates Development Company Management Advice (22 March 2021)	Revegetation planting and direct seeding did not commence during the 2021 audit period.	Not applicable
CRMP 36	Table 4.2: Monitoring Program – On-site Revegetation 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 to October) until achievement of performance targets.	Estates Development Company Management Advice (22 March 2021)	Revegetation planting and direct seeding did not commence during the 2021 audit period.	Not applicable
CRMP 37	Table 6.1: Long-term Management and Timeframes for Implementation The CRMP will be implemented until the performance targets are achieved.	Until the performance targets are achieved to the satisfaction of the City of Wanneroo	Estates Development Company Management Advice (22 March 2021)	Most of the revegetation requirements in the CRMP did not commence during the 2021 audit period.	Not applicable
CRMP 38	Table 6.1: Long-term Management and Timeframes for Implementation Retained habitat in Parks and Recreation Reserves will be the responsibility of Western Australian Planning Commission (WAPC).	WAPC will initiate the re-vestment order once Westminster has completed the works required under 10 (g) of the EPBC approval	R001_JBSG_Jindee_ACR_2021_23042021	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.	Not applicable
CRMP 39	Table 6.1: 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 Metropolitans Regional Scheme amendment.	During construction	Estates Development Company Management Advice (22 March 2021)	Refer to CRMP 38	Not applicable
CRMP 40	Table 6.1: 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 are achieved, and areas have been handed over	Estates Development Company Management Advice (22 March 2021)	Most of the revegetation requirements in the CRMP did not commence during audit period	Not applicable
CRMP 41	Table 6.1: Long-term Management and Timeframes for Implementation Areas will be handed over at the time land titles for the POS space(s) are created.	At the time the POS and civic space land titles are created	Estates Development Company Management Advice (22 March 2021)	Land titles for the POS space(s) have not been created.	Not applicable
CRMP 42	Condition 42 was removed upon variation and reapproval of Revision 7 of the CRMP				
CRMP 43	Condition 43 was removed upon variation and reapproval of Revision 7 of the CRMP				
CRMP 44	Condition 44 was removed upon variation and reapproval of Revision 7 of the CRMP				

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