

APPENDIX B: DCCEEW request for additional information checklist

Table B-1: Response to DCCEEW Request for Further Information comments, dated 28 May 2024

DCCEEW request for additional information	DCCEEW comments on preliminary documentation (First Draft)	Preliminary documentation (Rev 1) reference
<b>1. Ecological data provision</b>		
1. Appendix of occurrence records (both sightings and evidence of presence) for all listed threatened and migratory species identified during field surveys for the proposed action. Provided in accordance with the department's Guidelines for biological survey and mapped data (2018) using the species observation data template provided with this request for additional information	1. Further requested field studies have not been conducted. Please provide the requested appendix of occurrence records (both sightings and evidence of presence) for Carnaby's cockatoo ( <i>Zanda latirostris</i> listed as <i>Calyptorhynchus latirostris</i> ) and Fork-tailed swift ( <i>Apus pacificus</i> ) identified during the field surveys for the proposed action	<ul style="list-style-type: none"><li>Appendix C (EPBC Act listed threatened and migratory species occurrence records from 2024/2025 surveys) provides occurrence records of listed threatened flora and fauna species from the Carnaby's Black-Cockatoo and Fork-tailed Swift utilisation survey (BCE 2025) and the Targeted star sun orchid and sandplain duck orchid searches (RPS 2025)</li><li>Appendices F to M provide occurrence records for all listed threatened and migratory species. The reports were prepared before the release of Guidelines for biological survey and mapped data (2018) and cessation of transitional arrangements, and as such its spatial data has not been presented as an appendix of occurrence records</li></ul>
<b>2. Additional information on listed threatened bird species and listed migratory species</b>		
Additional information on all listed, threatened and migratory bird species must include but may not be limited to: 1. The status of populations (e.g. abundance) that occur in, adjacent to, or may transit or overfly, the project area	1. Criteria met for: Curlew Sandpiper ( <i>Calidris ferruginea</i> ), Sharp-tailed sandpiper ( <i>Calidris acuminata</i> ), Pectoral Sandpiper ( <i>Calidris melanotos</i> ), and Common Sandpiper ( <i>Actitis hypoleucos</i> ).  Assessment of the status of the population is required for Carnaby's cockatoo ( <i>Zanda latirostris</i> listed as <i>Calyptorhynchus latirostris</i> ) and Fork-tailed swift ( <i>Apus pacificus</i> )	<ul style="list-style-type: none"><li>Section 5.2 (Additional information on listed threatened bird species and listed migratory species) provides additional information on listed threatened bird species and listed migratory species</li><li>Section 5.3 (Carnaby's cockatoo specific assessment) provides additional information on Carnaby's cockatoo</li></ul>
2. Assessment of habitat occurring within, or adjacent to, the project area, and its importance (including habitat utilisation) in a local, regional, national and international context	2. Criteria met for: Curlew Sandpiper, Fork-tailed Swift, Sharp-tailed Sandpiper, Pectoral Sandpiper, Common Sandpiper, and Fork-tailed swift.  Assessment of habitat is required for Carnaby's cockatoo, particularly related to roosting and breeding habitat utilised by nesting birds	
3. Assessment of site utilisation for each of the bird species including foraging, roosting, transiting, resting and nesting habitats, and migratory flight paths across the site. This must include frequency, time of day/night, numbers, and time of year, particularly with regard to migratory overflying	3. Site utilisation not required for: Curlew Sandpiper, Sharp-tailed Sandpiper, Pectoral Sandpiper, and Common Sandpiper.  Assessment of site utilisation required for: Carnaby cockatoo and Fork-tailed swift	
4. Include a discussion on vegetation composition and structure in relation to the development footprint, project area and broader region. The presence, extent and density (including foliage cover and flowering density) of all plant species that provide foraging, including non-native food sources.	4. Criteria met, no further information required.	N/A
5. Provide detailed mapping of suitable habitat for all listed threatened or migratory bird species which: a. Is specific to the habitat assessment undertaken for each bird species b. Includes an overlay of the updated project disturbance footprint. c. Includes known records of individuals derived from desktop analysis, including from SPRAT Database and field surveys d. Include habitat that is within and adjacent to the project to provide regional context e. Include a map of all water bodies (including farm dams/ troughs, etc.) within the development footprint, project area and broader region, with an overlay of the different habitat features (e.g., breeding, foraging, dispersal) f. Identification of permanent or seasonal water bodies or watercourses within twelve (12) kilometres of the disturbance footprint to demonstrate the use of different habitat features g. Discuss the suitability of the water sources for each of the species (e.g., rate of water movement, potability for birds, access) h. Include mapping of nearby conservation areas (e.g. National Parks, Nature Reserves, Nature refuges, etc.) and road reserves and describe how these different habitats are utilised for each of the species (e.g. breeding, foraging, roosting) i. Images provided separately as attachments in JPEG format	5. Detailed mapping was not provided of the suitable habitat for all listed threatened or migratory bird species which includes: a – i. Separate maps need to be provided for the Carnaby's cockatoo and the Fork-tailed Swift. It would be appropriate to include a singular map for the migrating waders	<ul style="list-style-type: none"><li>Section 5.2 (Additional information on listed threatened bird species and listed migratory species) provides additional information on listed threatened bird species and listed migratory species</li><li>Section 5.3 (Carnaby's cockatoo specific assessment) provides additional information on Carnaby's cockatoo</li><li>Figure K (Migrating wader habitat) presents detailed mapping of suitable habitat for Curlew sandpiper, Sharp-tailed sandpiper, Pectoral sandpiper and Common sandpiper</li><li>Figure L (Fork tailed swift habitat) presents detailed mapping of suitable habitat for Fork-tailed swift</li><li>Figure M (Carnaby's cockatoo occurrence records) presents detailed mapping of known records of individuals derived from desktop analysis and surveys</li><li>Figure N (Carnaby's cockatoo breeding and roosting habitat) presents detailed mapping of suitable breeding and roosting habitat for Carnaby's cockatoo</li><li>Figure O (Carnaby's cockatoo foraging habitat) presents detailed mapping of suitable foraging habitat for Carnaby's cockatoo</li></ul>
6. Details of the foraging habitat available to each bird species, and the impact the proposed action will have on the ability for species to utilise this habitat.	6. Criteria met for: Curlew Sandpiper, Fork-tailed Swift, Sharp-tailed Sandpiper, Pectoral Sandpiper and Common Sandpiper	<ul style="list-style-type: none"><li>Section 5.2 (Additional information on listed threatened bird species and listed migratory species) provides additional information on foraging habitat for listed threatened bird species and listed migratory species</li></ul>

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	Further assessment is required for the Carnaby's cockatoo.	<ul style="list-style-type: none"> <li>Section 5.3 (Carnaby's cockatoo specific assessment) provides additional information on foraging habitat for Carnaby's cockatoo</li> <li>Section 6.1 (Key potential impacts) assesses impacts to foraging habitat for threatened and migratory bird species</li> </ul>
7. Details of the flight characteristics and behaviours of the listed birds species, specifically with regard to occupying or overflying the project area within the rotor swept area and transmission lines	<p>7. Flight characteristics and behaviours is not required for: Curlew Sandpiper, Sharp-tailed Sandpiper, Pectoral Sandpiper and Common Sandpiper.</p> <p>Further flight characteristics and behaviours is required for: Carnaby's cockatoo and Fork-tailed swift</p>	<ul style="list-style-type: none"> <li>Section 5.2 (Additional information on listed threatened bird species and listed migratory species) provides additional information on transiting and flight paths for listed threatened bird species and listed migratory species</li> <li>Section 5.3 (Carnaby's cockatoo specific assessment) provides additional information on flight characteristics and behaviours for Carnaby's cockatoo</li> </ul>
<b>2.1.1 Carnaby's cockatoo (<i>Zanda latirostris</i> listed as <i>Calyptorhynchus latirostris</i>) (Endangered)</b>		
Preliminary Documentation must include a detailed habitat assessment for Carnaby's Black Cockatoos (CBC). A general fauna habitat assessment was provided with the referral documentation and additional information about the quality of the foraging habitat, the availability of breeding habitat for CBC is required, including:	1. Criteria met.	N/A
1. Provide the results/scores of a habitat quality assessment using methodology that recognises key habitat characteristics specific to CBC foraging habitat requirements and values. The values from the scoring system for the assessment of foraging value of vegetation for CBC must be supported with clear evidence. Relevant habitat characteristics and associated methodology needs to be documented.		
2. Provide further information on breeding habitat trees. The Referral guideline for 3 WA threatened black cockatoo species notes that trees suitable to develop a nest hollow in the future are 30-50 cm DBH. Provide details (number, type and size) of trees with DBH > 30 cm. Provide details (number, type and size) of potential roosting trees.	2. Sufficient information has been provided with the location of breeding habitat trees.	N/A
3. Provide details of trees (number, type and size) with a diameter at breast height (DBH) within 12 km radius from the perimeter of the proposed action area. a. Discuss the distance of the closest breeding site from the proposed action site, the species using the breeding site, the size of the breeding site (number of trees and area in ha), and estimated number of breeding pairs that use the site	3. Further information needs to be provided on breeding and roosting locations within 12 km. We are particularly interested in information regarding the breeding and roosting locations near the perimeter of the proposed action and out to 6 km. This information is imperative to characterising the Carnaby's use of the area and assess the possible direct and/or indirect impacts	<ul style="list-style-type: none"> <li>Section 5.3 (Carnaby's cockatoo specific assessment) provides additional information on Carnaby's cockatoo</li> <li>Figure N (Carnaby's cockatoo breeding and roosting habitat) presents detailed mapping of suitable breeding and roosting habitat for Carnaby's cockatoo</li> <li>Appendix V (Confirmed and potential breeding trees) presents a list of confirmed and breeding trees within 12 km radius of the Project Area</li> </ul>
4. Provide further information on the role of the site maintaining habitat connectivity and supporting CBC movement through the landscape	<p>4. Further information needs to be provided, expanding the information from the Murdoch tracking data. Murdoch's data relates to a very small number of the Carnaby's cohort that use and move through the landscape. This data relates to a small number of individuals tracked from three primary breeding areas. Providing an understanding of how breeding birds (not represented in the Murdoch study) use and move through the breeding habitat and landscape is imperative. The Department is looking for behavioural observations that provide:</p> <ul style="list-style-type: none"> <li>The likely navigation flight paths to be used by breeding and roosting birds (such as predominantly flying close to vegetation canopy and utilise these areas as ecological linkages from breeding to roosting and foraging habitats)</li> <li>Where breeding and roosting birds are likely to cut across open areas between vegetation linkages</li> <li>How breeding birds will move across cleared ground and at what height they fly when: the distance isn't significant; they do not have any other option; they are reacting to birds of prey; and they are under significant pressure to supply resources</li> </ul> <p>Understanding the areas the birds are flying to and from and how they may utilise the site is imperative to assess the possible significance of impacts. Although the species is considered to be of medium likelihood of direct impact with the turbines, any impact would be of high consequence to the species</p>	Section 5.3 (Carnaby's cockatoo specific assessment) provides additional information on Carnaby's cockatoo
5. Provide a mapped area including a 12 km radius from the perimeter of the proposed action area. The map must include: <ul style="list-style-type: none"> <li>a. Potential habitat (vegetation cover that could include vegetation types likely to include species suitable for foraging, breeding and/or roosting habitat).</li> <li>b. Suitable watering habitat, based on the best available information.</li> <li>c. Conservation areas (areas with ongoing conservation protection on the title of the land, under an enduring protection mechanism).</li> </ul>	5. A consolidated mapped area still needs to be provided. The map should include a 6 km and a 12 km radius from the perimeter of the proposed action area, as well as i. – v. All the sourced information should be included on one layered map.	<ul style="list-style-type: none"> <li>Figure M (Carnaby's cockatoo occurrence records) presents detailed mapping of known records of individuals derived from desktop analysis and surveys</li> <li>Figure N (Carnaby's cockatoo breeding and roosting habitat) presents detailed mapping of suitable breeding and roosting habitat for Carnaby's cockatoo</li> <li>Figure O (Carnaby's cockatoo foraging habitat) presents detailed mapping of suitable foraging habitat for Carnaby's Cockatoo</li> </ul>

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<p>d. Migration and key seasonal movement patterns of CBC flocks, relative to the proposed action area (based on best available information).</p> <p>e. Known areas of aggregation/key habitats areas.</p>		
6. Provide a description of methodology, source data and any other relevant evidence used to create the maps	6. An adequate description of methodology, source data and any other relevant evidence used to create the maps still needs to be provided	Section 15 (Information sources) provides descriptions of the source data and methodology to create figures
7. Survey data more than 5 years old may be used as supplementary supporting evidence; however, due to continual changes in populations of species, recent survey data is required	<p>7. Further surveys will be required to better understand the site utilisation by Carnaby's cockatoos as outlined in point 2.1.2.4 above.</p> <p>In accordance with the department's requirement for recent survey data the only site-specific surveys related to the Carnaby's cockatoo were the 2022 Reconnaissance Flora Survey that looked at flora and the foraging habitat of the cockatoo, and the 2022 Black Cockatoo Habitat Assessment that looked at the foraging, roosting, and breeding habitat in the Project Area. The purpose of 2022 Black Cockatoo Habitat Assessment was to look at Carnaby habitat, and during the assessment some observations of Carnaby presence was noted. The area covered 1408.26 ha on the 14 and 15 October 2021 using All Terrain Vehicles and 4WD, and 42.43ha on the 28 October 2022 predominantly by foot</p>	<ul style="list-style-type: none"> <li>Section 5.3 (Carnaby's cockatoo specific assessment) provides information on the Carnaby's Black-Cockatoo and Fork-tailed Swift utilisation survey (BCE 2025) which was undertaken between August 2024 to January 2025</li> <li>Appendix C (Carnaby's Black-Cockatoo and Fork-tailed Swift utilisation survey report)</li> </ul>
<b>2.2.1 Banksia Woodlands of the Swan Coastal Plain Ecological Community (Endangered)</b>		
The referral form states that 0.3 ha of Banksia TEC will be impacted by the proposed action. With reference to the Conservation Advice, address the following:	1. Criteria met.	N/A
1. Provide the size and condition of the larger patch that the 0.3 ha is within. Survey the patch extending outside of the proposed action area to provide a regional context.		
2. Provide an analysis as to whether the wider patch remains a TEC with the removal of the 0.3 ha within the proposed action area.	2. Criteria met.	N/A
3. The referral application notes that the 0.3 ha is in 'Excellent to Good to Very Good condition'. The supplementary flora, vegetation, and fauna survey (Att15) identified 5.05 ha of Banksia Low Open Woodland vegetation units in 'Excellent' condition. Please confirm the condition of the 0.3 ha.	3. Criteria met.	N/A
4. Provide the Floristic Community Type of the Banksia TEC.	4. Criteria met.	N/A
5. Provide a regional context map showing the extent of the Banksia TEC	5. A consolidated map needs to be provided that show the project area, the 0.3ha proposed to be cleared, 12.7 ha of further Banksia TEC, and DBCA regional records.	<ul style="list-style-type: none"> <li>Section 5.4.1 (Banksia woodland of the Swan Coastal Plain Threatened Ecological Community)</li> <li>Figure I (Banksia Woodlands of the Swan Coastal Plain Threatened Ecological Community) presents a regional context map for the Banksia Woodlands of the Swan Coastal Plain TEC</li> </ul>
<b>2.2.2 Star Sun-orchid (<i>Thelymitra stellata</i>) (Endangered)</b>		
Discuss the habitat and number of individuals of star sun-orchid ( <i>Thelymitra stellata</i> ) in the development footprint, and project area. Include a discussion on the habitat and how it aligns with the Star Sun-orchid Conservation Advice in the immediate region.		
1. Conduct a targeted surveys for Star Sun-orchid in accordance with the Draft Survey Guidelines for Australia's Threatened Orchids found at Table C Item 2.4d. Surveys should be during the flowering seasons within the development footprint, project area and broader region to provide a greater understanding of the occurrence of the species	<p>1. No further surveys have been conducted since the 29 Sept 21-7 Oct. 2021 survey over 1408 ha and the 7 and 9 Sept 2022 survey over 37ha. The requested additional targeted survey for Star Sun-orchid in accordance with the Draft Survey Guidelines for Australia's Threatened Orchids is still required. The targeted survey in 2022 was conducted in early September and not during the peak detectability month of October in accordance with the Draft Survey Guidelines for Australia's Threatened Orchids.</p> <p>The Department considers that, even with the period leading up to survey in 2021 being considered ideal, surveying later into the month of October may have identified further individuals. Several records of the Star Sun Orchid within the Project Area and within close proximity to the Indicative Works Area were identified in the DBCA records, however, these were not identified during the 2021 and/or 2022 surveys.</p> <p>We note that the 2021 survey plus the 2022 targeted survey covered 90% of the proteaceous heath vegetation within the Native Vegetation Clearing Area. Given the proteaceous heath is key target habitat for the endangered Star sun-orchid, we request that the 90% of likely star sun-orchid habitat is re-surveyed and the remaining 10% is surveyed for the first time during the ideal time window according to the Draft Survey Guidelines for Australia's Threatened Orchids (October to December), unless a local orchid expert justifies a more appropriate survey window in accordance with the local conditions. This additional survey can be considered to cover the multiple seasons required in the Draft Survey Guidelines for Australia's Threatened Orchids and ensure that 100% of the likely star sun-orchid habitat within the project area is surveyed.</p>	<ul style="list-style-type: none"> <li>Section 5.4.2 (Star sun-orchid) provides the findings of the Targeted star sun-orchid and sandplain duck orchid searches (RPS 2025). The search was undertaken from 21 to 24 October 2024, during the peak detectability month of October in accordance with the draft Survey Guidelines for Australia's Threatened Orchids (Commonwealth of Australia 2013).</li> <li>Appendix E (Targeted star sun orchid and sandplain duck orchid searches)</li> </ul>

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2. Weather and climate conditions must be recorded for all surveys and the periods leading up to surveys as the orchid does not flower every year and may remained closed during cool and overcast weather opening only in warm, sunny weather.	2. Weather and climate conditions leading up to surveys was included; however, no information was provided relating to the timings or conditions on the days of survey.	<ul style="list-style-type: none"> <li>Section 5.4.2 (Star sun-orchid) provides the weather and climate conditions for the Reconnaissance flora and vegetation survey (RPS 2023) and the Targeted star sun-orchid and sandplain duck orchid searches (RPS 2025)</li> <li>Appendix E (Targeted star sun orchid and sandplain duck orchid searches) provides weather and climate conditions for the periods leading up to the survey and during the survey</li> <li>Appendix G (Reconnaissance flora and vegetation assessment) provides weather and climate conditions for the periods leading up to the survey</li> </ul>
3. Provide a map that clearly demonstrates the extent of the orchid with an overlay of the different habitat features within and adjacent to the project area.	3. A consolidated map needs to be provided that show the project area, DBCA records, survey records, with an overlay of suitable habitats within and adjacent to the project area for the species.	Figure C (Star sun orchid habitat) presents a consolidated map of records and habitat features for Star sun orchid
4. Discuss the relationships between the habitat, the surveyed individuals, the development footprint, the likely need to support the genetic connectivity between the known and likely occurrences of the orchid across the distribution and broader regions	<p>4. Discussion on the relationships between the habitat, the surveyed individuals, the development footprint, the likely need to support the genetic connectivity between the known and likely occurrences of the orchid across the distribution and broader regions has not been provided. Discussion into the relationship requested in 2.2.2.4 will need to include the DBCA records and any further records located during further survey.</p> <p>Should pre-clearance surveys detect the species in areas of planned disturbance, DCCEEW is seeking avoidance of all individuals. Further, the Department requires an adequate protective buffer to all individuals. The buffer size should be justified by an accepted orchid expert with support of scientific evidence. The buffer should consider the types of indirect impacts of the proposed action will impose on the populations.</p>	<ul style="list-style-type: none"> <li>Section 5.4.2 (Star sun-orchid) provides a discussion on local and regional genetic connectivity of known and likely star sun-orchids and impact avoidance approach</li> <li>Figure C (Star sun orchid habitat) presents a consolidated map of DBCA and survey records of Star sun orchid</li> </ul>
<b>2.2.3 Dwarf green kangaroo paw (<i>Anigozanthos viridis</i> subsp. <i>terraspectans</i>) (Vulnerable)</b>		
Discuss the habitat and number of individuals of dwarf green kangaroo paw ( <i>Anigozanthos viridis</i> subsp. <i>terraspectans</i> ) in the development footprint, project area and immediate region. The Reconnaissance Flora and Vegetation Assessment identified the occurrence of Dwarf Green Kangaroo Paw flora species in the development envelope. However, no information was provided on the species location, the numbers in the area, or the occurrences in relation to the Indicative Disturbance Area.	1. Criteria met.	N/A
1. Discuss the habitat and the number of surveyed individuals in relation to the development footprint, and project area.		
2. Discuss this population within the context of the immediate region.	2. Criteria met.	N/A
3. Include a map of surveyed individuals with an overlay of the different habitat features within and adjacent to the project area.	3. A consolidated map needs to be provided that shows the project area, DBCA records, survey records, with an overlay of suitable habitats within and adjacent to the project area for the species	Figure D (Dwarf green kangaroo paw habitat) presents a consolidated map of records and habitat features for Dwarf green kangaroo paw
4. Discuss the potential impacts to the species and if the proposed action is likely to adversely affect habitat critical to the survival of the species in alignment with the approved Conservation Advice for <i>Anigozanthos viridis</i> subsp. <i>terraspectans</i> (Dwarf Green Kangaroo Paw).	4. Criteria met.	N/A



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5. If required, conduct targeted surveys for Dwarf Green Kangaroo Paw and its habitat in accordance with the Environmental Protection Authority (EPA) (2016a) Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment, December 2016.	5. Further surveys not required.	N/A
<b>2.2.4 Lesueur hakea (<i>Hakea megalosperma</i>) (Vulnerable)</b>		
Discuss the habitat and number of individuals of Lesueur hakea ( <i>Hakea megalosperma</i> ) in the development footprint, project area and immediate region. The Reconnaissance Flora and Vegetation Assessment identified the occurrence of Lesueur Hakea ( <i>Hakea megalosperma</i> ) flora species in the development envelope. However, no information was provided on the species location, the numbers in the area, or the occurrences in relation to the Indicative Disturbance Area. The possible impact on this listed flora species has not been addressed in the referral documentation.	1. A consolidated map needs to be provided that shows the project area, DBCA records, survey records, with an overlay of suitable habitats within and adjacent to the project area for the species	Figure E (Lesueur hakea habitat) presents a consolidated map of records and habitat features for Lesueur hakea
1. Include a map of surveyed individuals with an overlay of the different habitat features within and adjacent to the project area		
2. Discuss the habitat and the number of surveyed individuals in relation to the development footprint, project area and immediate region	2. In addition to the discussion of the species within the PD, a suitable description of the location of the species (e.g. road reserve) needs to be provided	Section 5.4.4 (Lesueur hakea) provides additional information on the location of the DBCA records and surveyed records (RPS 2023)
3. Discuss the potential impacts to the species and if the proposed action is likely to adversely affect habitat critical to the survival of the species in alignment with the approved Conservation Advice for <i>Hakea megalosperma</i> (Lesueur Hakea)	3. Discussion on the potential impacts to the species and if the proposed action is likely to adversely affect habitat critical to the survival of the species in alignment with the approved Conservation Advice for <i>Hakea megalosperma</i> (Lesueur Hakea) has not been provided. This discussion should include proximity to existing infrastructure (e.g. unsealed road) and outline any potentially indirect impacts such as dust from increased road use due to the wind farm operations	Section 6.1.1.1.3 (Lesueur hakea) addresses potential impacts to the species with consideration of the approved Conservation Advice for <i>Hakea megalosperma</i> (Lesueur Hakea).
4. Surveys for Lesueur Hakea and its habitat must be conducted in accordance with the Environmental Protection Authority (EPA)(2016a) Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment, December 2016.	4. Further surveys not required.	N/A
<b>2.2.5 Sandplain duck orchid (<i>Caleana dixonii</i> listed as <i>Paracaleana dixonii</i>) (Endangered)</b>		
The department notes that the Reconnaissance Flora and Vegetation Assessment did not identify these species within the development envelope; however, suitable vegetation types occur within the development envelope. The department considers that these species of orchids may not emerge each year if conditions are not favourable, can be cryptic and sometimes multiple survey efforts may be required to conclude likely absence. Targeted surveying is required to conclude with confidence whether the Sandplain Duck Orchid is absent from the proposed action area.	1. No further surveys have been conducted since the 29 Sept 21-7 Oct 2021 survey over 1408 ha and the 7 and 9 Sept 2022 survey over 37ha. The requested additional targeted survey for Sandplain Duck orchid is still required to be undertaken in accordance with the Draft Survey Guidelines for Australia's Threatened Orchids. These Survey Guidelines indicates peak detectability for this species is October to January and requires 2 consecutive seasons. This additional survey can be considered to cover the multiple seasons required in the Draft Survey Guidelines for Australia's Threatened Orchids and ensure that 100% of the likely sandplain duck orchid habitat within the project area is surveyed. Due to the cryptic nature of this species, the survey should be undertaken when a known local population is confirmed to be flowering to ensure the adequacy of the environmental factors leading to this species presenting. This will support claims if the species is found to be absent during targeted surveys	Section 5.4.5 (Sandplain duck orchid) presents additional information on the location of the DBCA records and outcomes from the Targeted star sun-orchid and sandplain duck orchid searches (RPS 2025).
1. Conduct targeted surveys for the Sandplain Duck Orchid, and its habitats within the development footprint, project area and broader region in accordance with the Draft Survey Guidelines for Australia's Threatened Orchids found at Table C Item 2.4d		
2. If follow up surveys detect the species: provide information about population size and the number of individuals that will be directly and indirectly impacted by the proposed action as well as habitat quality for the development footprint, project area and broader region	2. Surveys have not been conducted	The Targeted star sun-orchid and sandplain duck orchid searches (RPS 2025) did not detect the species within the Project Area, therefore the information requested is not applicable.
3. Include a map of surveyed individuals with an overlay of the different habitat features within and adjacent to the project area	3. A consolidated map needs to be provided showing the project area, DBCA records, survey records, with an overlay of suitable habitats within and adjacent to the project area for the species	Figure F (Sandplain duck orchid habitat) presents a consolidated map of records and habitat features for sandplain duck orchid
<b>2.2.6 Glossy-leafed Hammer Orchid (<i>Drakaea elastica</i>) (Endangered)</b>		
The department notes that the Reconnaissance Flora and Vegetation Assessment did not identify these species within the development envelope; however, suitable vegetation types occur within the development envelope. The department considers that these species of orchids may not emerge each year if conditions are not favourable, can be cryptic and sometimes multiple survey efforts may be required to conclude likely absence. Targeted	1. Sufficient evidence has been provided to support the absence of this species in this project location.	N/A

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surveying is required to conclude with confidence whether the Glossy-leafed Hammer Orchid is absent from the proposed action area.		
1. Conduct targeted surveys for the Sandplain Duck Orchid, the Glossy-leafed Hammer Orchid and their habitats within the development footprint, project area and broader region in accordance with the Draft Survey Guidelines for Australia's Threatened Orchids found at Table C Item 2.4d.		
2. If follow up surveys detect the species: provide information about population size and the number of individuals that will be directly and indirectly impacted by the proposed action as well as habitat quality for the development footprint, project area and broader region.	2. No longer required.	N/A
3. Include a map of surveyed individuals with an overlay of the different habitat features within and adjacent to the project area.	3. No longer required.	N/A
<b>3. Relevant impacts</b>		
The preliminary documentation must include an assessment of potential impacts (including direct, indirect, facilitated and cumulative impacts) that may occur as a result of all elements and project phases of the proposed action (e.g. construction, post-construction and operation) on the MNES addressed at Section 2. Consideration of impacts must not be confined to the immediate area of the proposed action but must also consider the potential of the proposed action to impact on adjacent areas that are likely to contain populations of, or habitat for, MNES	The relevant impacts component of the preliminary documentation has not been assessed as further surveys are required in order to better define the possible direct, indirect, facilitated and accumulative impacts.	Section 6 (Impact Assessment) provides an assessment of potential direct, indirect and cumulative impacts
<b>4. Proposed avoidance and mitigation measures</b>		
Avoidance and mitigation measures are the primary methods of eliminating and reducing significant impacts on MNES. Where possible and practicable it is best to avoid impacts. If impacts cannot be avoided, then they should be minimised or mitigated as much as possible. Avoidance and mitigation measures must be investigated thoroughly as a part of the assessment and be supported by evidence to demonstrate likely success.  The preliminary documentation must include detailed descriptions of measures proposed to be undertaken by the proponent to avoid, minimise and manage relevant impacts of the project on the listed MNES species. The proposed measures should be based on best available practices, appropriate standards and supported by scientific evidence and must include the following elements <sup>1</sup> : <ul style="list-style-type: none"><li>Identify and describe potential alternatives and proposed design options (e.g. turbine models and configurations (including height, blade length and generator models); and mitigation measures, which could avoid or minimise significant impacts on listed birds species, and clearly state which avoidance or mitigation measure will be committed to;</li><li>assessment of the expected or predicted effectiveness of the proposed mitigation measures;</li><li>any statutory or policy basis for the proposed mitigation measures, including reference to approved conservation advices relevant to the listed threatened species, and discussion on how the proposed mitigation measures are not inconsistent with recovery plans and threat abatement plans relevant to the listed threatened species and communities;</li><li>evidence to support the basis for proposed mitigation measures and their likely effectiveness;</li><li>any mitigation measures proposed to be undertaken by State and local governments;</li><li>details of ongoing management, including monitoring programs to support an adaptive management approach and determine the effectiveness of the measures proposed; and</li><li>the name of the agency responsible for endorsing or approving each mitigation measure or monitoring program.</li></ul>	The proposed avoidance and mitigation measures of the preliminary documentation have not been assessed as further surveys are required in order to better define the possible impacts	Section 7 (Proposed avoidance and mitigation measures) identifies avoidance, minimisation, mitigation and monitoring requirements
<b>5. Residual impacts and proposed offsets</b>		
Describe the residual impacts on MNES that are likely to occur as a result of the proposed action in its entirety, after proposed avoidance and mitigation measures are taken into account. If applicable, this should include the reasons why avoidance or mitigation of impacts cannot be reasonably achieved.  If residual impacts are likely to be significant, please provide an offset package to compensate for residual impacts to MNES. This should consist of an offset proposal and key commitments	The proposed residual impacts of the projects can not be understood until further required surveys have been undertaken. Therefore, the residual impacts and proposed offsets have not been assessed for the preliminary documentation at this stage	Section 8 (Residual impacts and proposed offsets) identifies the residual impacts to MNES  An Offset Management Strategy (Surefire Environmental Pty Ltd 2025; Appendix AA) has been prepared to counterbalance the loss of Carnaby's cockatoo foraging, potential breeding and potential roosting habitat attributable to the Proposed Action, that are not able to be otherwise avoided or mitigated onsite.

<sup>1</sup> These bullet points are sourced from DCCEEW's Request for Additional Information Assessment by Preliminary Documentation, dated 22 December 2023.

DCCEEW request for additional information	DCCEEW comments on preliminary documentation (First Draft)	Preliminary documentation (Rev 1) reference
and management actions to deliver and implement a proposed offset (i.e. an Offset Management Plan). Offsets must directly contribute to the ongoing viability of the threatened and migratory species. It must deliver an overall conservation outcome that improves or maintains the viability of the protected matter, as compared to what is likely to have occurred if neither the action nor the offset had taken place. The offset proposal should demonstrate how the conservation outcome will be delivered for the protected matter.		The Offset Management Strategy includes an offset proposal, commitments and management actions to deliver and implement a direct offset. A more detailed Offset Management Plan will be prepared and provided to DCCEEW prior to final determination to align the anticipated offset requirements under Commonwealth and State approval applications.
<b>6. Other approvals and conditions</b>		
The preliminary documentation must include information on any other requirements for approval or conditions that apply, or that you reasonably believe are likely to apply, to the proposed action. This must include: 1. A description of any approval obtained or required to be obtained from a State or Commonwealth agency or authority (other than an approval under the EPBC Act), including any conditions that apply to the proposed action	1. The preliminary documentation provides information on the acts, regulations and guidance's applicable to the proposed action. There appears to only be an approval given by the Shire of Dandaragan under the <i>Planning and Development Act 2005</i> . Further information is required on the relevant approvals required and where the proponent is at with each approval	Section 9 (Other statutory approvals) identifies other Commonwealth and State statutory approvals required for the proposed action
2. A description of the monitoring, enforcement and review procedures that apply, or are proposed to apply, to the action	2. To assist the description of the monitoring, enforcement and review procedures that apply, or are proposed to apply to the action (still to be adequately provided), please include a map listing all the lots, road reserves and crown land parcels for the proposed action. The enforcement and procedures relevant to the land tenures, such as land use agreements, need to be provided.  Lot and road reserve details Certificate of Title (volume/folio) – Lot 2 on Deposited Plan 8424 1747/835 – Lot 3 on Deposited Plan 8424 1604/69 – Lot 2 on Deposited Plan 408189 2906/375 (intersect mining lease) Lot 3 on Deposited Plan 408189 2906/376 (intersect mining lease) Lot 101 on Diagram 72336 1780/891 – Lot 105 on Deposited Plan 59027 2685/985 – Lot 3846 on Deposited Plan 209083 1604/70 – Lot 3805 on Deposited Plan 209083 1888/114 Lot 3897 on Deposited Plan 209569 1834/391 Lot 3899 on Deposited Plan 209567 1780/892 Lot 3903 on Deposited Plan 209569 1859/822 Lot 3901 on Deposited Plan 209568 3141/872 – Lot 4134 on Deposited Plan 240347 3089/642 (DBCA managed Crown Reserve 41986)  Road reserve – P Road (Land ID 3182207) (Shire of Dandaragan managed Waddi Road Reserve) – P Road (Land ID 3608625) (Shire of Dandaragan managed Mullering Road Reserve) – P Road (Land ID 3608624) (Main Roads WA managed Brand Highway Road Reserve)	Section 9 (Other statutory approvals) identifies the monitoring, enforcement and review procedures of the Commonwealth and State statutory approvals required for the proposed action Appendix Q (Lots, road reserves and Crown land parcels for the Proposed Action) present a map listing all the lots, road reserves and crown land parcels for the proposed action
<b>7. Social and Economic</b>		
The proponent must provide a discussion and analysis of the social and economic impacts of the project, both positive and negative, in the preliminary documentation. Economic and social impacts should be considered at the local, regional and national levels. Matters of interest may include: 1. details of any public consultation activities undertaken, and their outcomes; 2. details of any consultation with Indigenous stakeholders; 3. projected economic costs and benefits of the project (in dollars), including the basis for their estimation through cost/benefit analysis or similar studies; and 4. employment opportunities expected to be generated by the project (including construction and operational phases) 5. projected public benefits expected to be generated by the project.	1. Criteria met. 2. Criteria met. 3. Criteria met. 4. Criteria met. 5. Criteria met.	N/A
<b>8. Ecologically sustainable development (ESD)</b>		
Please include a discussion of how the project will conform to the principles of ESD. To assist you, the National Strategy for Ecologically Sustainable Development (1992) is available at:	The ecologically sustainable development discussion cannot be assessed until the impacts of the projects can be fully understood	Section 11 (Ecologically sustainable development) discussion of how the proposed action will conforms to Ecologically sustainable development principles

DCCEEW request for additional information	DCCEEW comments on preliminary documentation (First Draft)	Preliminary documentation (Rev 1) reference
www.environment.gov.au/about-us/esd/publications/national-esd-strategy		
<b>9. Consistency with national and international obligations</b>		
Justify, with supporting evidence, how the proposed action will not be inconsistent with Australia's obligations under: 1. <i>Environment Protection Biodiversity Conservation Act 1999</i> , 2. EPBC Act Policy Statements, and guidelines. 3. any recovery plan or threat abatement plan for the species. 4. the Bonn Convention; 5. China-Australia Migratory Bird Agreement; 6. Japan-Australia Migratory Bird Agreement; 7. International Agreement – Republic of Korea-Australia Migratory Bird Agreement; and 8. any international agreement approved under subsection 209(4) of the EPBC Act	The proposed actions consistency with Australia obligations cannot be assessed until the impacts of the projects can be fully understood	Section 12 (National and international obligations) identifies other published Commonwealth guidance material and its relationship to the proposed action

Table B-2: Response to DCCEEW Request for Further Information comments, dated 22 December 2023

No.	Issue	DCCEEW request for additional information (Appendix A)	Preliminary documentation (Rev 1) reference
1	General content, format and style	The preliminary documentation, which includes the referral documentation and the additional information described below, must be a stand-alone document that contains sufficient information to avoid the need to search out previous or supplementary reports. The preliminary documentation should take into consideration the EPBC Act Significant Impact Guidelines 1.1 and EPBC Act Significant Impact Guidelines 1.3, available at: <a href="http://www.environment.gov.au/epbc/guidelines-policies.html">www.environment.gov.au/epbc/guidelines-policies.html</a> .	Section 1.2 (Purpose of preliminary documentation) identifies the Commonwealth standards, policies and other guidance material which the preliminary documentation has been prepared in accordance with
		The document must enable interested stakeholders and the Minister to easily understand the consequences of the proposed action on matters of national environmental significance (MNES). Information provided in the document should be objective, clear, succinct, avoid technical jargon and, where appropriate, be supported by maps, plans, diagrams, data or other descriptive detail	Section 6 (Impact assessment) identifies the consequences of the proposed action on MNES
		Detailed technical information, studies or investigations necessary to support the information in the stand-alone document must be included as appendices. It is recommended that any additional supporting documentation and studies, reports or literature not normally available to the public, from which information has been extracted, be made available at appropriate locations during the period of public display of the preliminary documentation. The proponent should also make sure the preliminary documentation is made available on the Internet.	<ul style="list-style-type: none"> <li>• Appendices A to AA</li> <li>• Preliminary documentation, including Appendices A to S, and V to AA, will be available on the internet</li> </ul>
		If it is necessary to make use of material that is considered to be of a confidential nature, the proponent should consult with the Department of Climate Change, Energy, the Environment and Water (the department) on the preferred presentation of that material before submitting it to the Minister for approval for publication or for public comment.	<ul style="list-style-type: none"> <li>• Monitoring information from proximate Dandaragan wind farms is commercial in confidence. These reports which are provided in Appendices T and U will be removed from the preliminary documentation prior to public exhibition</li> <li>• Appendices O, Q, and V have been redacted to remove confidential information</li> </ul>
		The level of analysis and detail in the stand-alone document should reflect the level of significance of the expected impacts on MNES. Any and all unknown variables or assumptions made in the assessment must be clearly stated and discussed. The extent to which the limitations, if any, of available information may influence the conclusions of the environmental assessment must be discussed.	<ul style="list-style-type: none"> <li>• Section 5 (Matters of National Environmental Significance) provides analysis and details of potential impacts to the identified MNES</li> <li>• Section 15 (Information sources) limitations of field surveys that have underpinned this analysis are referenced</li> </ul>
		The document should be written so that any conclusions reached can be independently assessed. To this end, all sources must be appropriately referenced using the Harvard standard of referencing. The reference list should include the address of any Internet webpages used as data sources. The preliminary documentation must include a list of persons and agencies consulted and the names of, and work done by, the persons involved in preparing the preliminary documentation.	<ul style="list-style-type: none"> <li>• Harvard standard referencing conventions used throughout the preliminary documentation</li> <li>• Section 15 (Information sources) provides the references</li> <li>• Section 10.1 (Stakeholder consultation) identifies agencies and stakeholders consulted</li> <li>• Section 14 (Preliminary documentation authors) provides a list of persons involved in preparing the preliminary documentation</li> </ul>
		Methodology should be scientifically-robust, appropriate for purpose, including a description of the methodology used, and justification of why the methodology was selected.	<ul style="list-style-type: none"> <li>• Scientifically-robust methodologies have been used for all field surveys and technical studies undertaken for the proposed actions</li> <li>• Detailed methodologies have been provided in each of the field surveys and technical studies</li> </ul>
		The preliminary documentation must reference all relevant standards, policies and other guidance material published by the Department. Any instances where published guidance is not followed must be justified. Where no Commonwealth standards exist, state government and/or industry standards may be appropriate.	<ul style="list-style-type: none"> <li>• Section 1.2 (Purpose of preliminary documentation) identifies the Commonwealth standards, policies and other guidance material which the preliminary documentation has been prepared in accordance with</li> </ul>



No.	Issue	DCCEEW request for additional information (Appendix A)	Preliminary documentation (Rev 1) reference
		<p>Maps, plans, diagrams and other illustrative material should be included in the preliminary documentation, and any images provided must be clearly annotated, in colour and of high resolution. The document should be produced on A4 size paper capable of being photocopied, with maps and diagrams on A4 or A3 size. The proponent should consider the format and style of the document appropriate for publication on the Internet. The capacity of a website to store data and display the material may have some bearing on how the document is constructed.</p> <p>The stand-alone document must include a copy of this request for information and a cross-reference table indicating where the information fulfilling this request is included in the preliminary documentation.</p>	<ul style="list-style-type: none"> <li>Section 12 (National and international obligations) identifies other published Commonwealth guidance material and its relationship to the proposed action</li> <li>Figures 1 to 19 have been provided within the report text</li> <li>Figures A to S have been compiled at the rear of the report</li> <li>Request for further information is provided as Appendix A</li> <li>This table provides a cross-reference source indicating where the information fulfilling this request is included in the preliminary documentation (Appendix B)</li> </ul>
	Ecological data provision	<p>The Preliminary Documentation must include an appendix of occurrence records (both sightings and evidence of presence) for all listed threatened and migratory species identified during field surveys for the proposed action. This data may be used by the department to update the relevant species distribution models that underpin the publicly available Protected Matters Search Tool (PMST). The species occurrence records must be provided in accordance with the department's Guidelines for biological survey and mapped data (2018) using the species observation data template provided with this request for additional information. Sensitive ecological data must be identified and treated in accordance with the department's Sensitive Ecological Data – Access and Management Policy V1.0 (2016) or subsequent revision.</p>	<ul style="list-style-type: none"> <li>Appendix C (EPBC Act listed threatened and migratory species occurrence records from 2024/2025 surveys) provides occurrence records of listed threatened flora and fauna species from the Carnaby's Black-Cockatoo and Fork-tailed Swift utilisation survey (BCE 2025) and the Targeted star sun orchid and sandplain duck orchid searches (RPS 2025)</li> <li>Appendices F to M provide occurrence records for all listed threatened and migratory species. The reports were prepared before the release of Guidelines for biological survey and mapped data (2018) and cessation of transitional arrangements, and as such its spatial data has not been presented as an appendix of occurrence records</li> </ul>
2	Matters of National Environmental Significance	<p>Based on the information provided in your referral, and other available information, the department considers that the listed species and communities and migratory species identified below may be significantly impacted by the proposed action, because of habitat clearance, habitat fragmentation, and through turbine and transmission line collision and barotrauma. These MNES species include:</p> <p>Listed threatened species and communities (sections 18 and 18A):</p> <ol style="list-style-type: none"> <li>Carnaby's black-cockatoo (<i>Zanda latirostris</i>) (Endangered)</li> <li>Curlew sandpiper (<i>Calidris ferruginea</i>) – Critically Endangered</li> <li>Banksia Woodlands of the Swan Coastal Plain Ecological Community – (Endangered)</li> <li>Star sun-orchid (<i>Thelymitra stellata</i>) (Endangered)</li> <li>Dwarf green kangaroo paw (<i>Anigozanthos viridis</i> subsp. <i>terraspectans</i>) (vulnerable)</li> <li>Lesueur hakea (<i>Hakea megalosperma</i>) (vulnerable)</li> <li>Sandplain duck orchid (<i>Caleana dixonii</i>) (endangered)</li> <li>Glossy-leafed hammer orchid (<i>Drakaea elastica</i>) (endangered)</li> </ol> <p>Migratory species (section 20 and 20A):</p> <ol style="list-style-type: none"> <li>Curlew sandpiper (<i>Calidris ferruginea</i>) (Migratory)</li> <li>Fork-tailed swift (<i>Apus pacificus</i>) (Migratory)</li> <li>Sharp-tailed sandpiper (<i>Calidris acuminata</i>) (migratory)</li> <li>Pectoral sandpiper (<i>Calidris melanotos</i>) (migratory)</li> <li>Common sandpiper (<i>Actitis hypoleucos</i>) (migratory).</li> </ol> <p>Note: The list above may not be a complete list of listed threatened species that will or are likely to be impacted by the proposed action. It is the proponent's responsibility to ensure any listed threatened species and ecological communities at the time of the controlled action decision, which will or are likely to be impacted by the proposed action, are assessed for the Minister's consideration. It is the proponent's responsibility to be aware of any changes to the distribution of listed threatened and migratory species, and information available in the Species Profile and Threats (SPRAT) Database. The proponent must ensure that a recent Protected Matters Search Tool (PMST) report has been generated and considered before finalising the draft preliminary documentation.</p>	<ul style="list-style-type: none"> <li>Section 5 (Matters of National Environmental Significance) provides analysis and details of potential impacts to the identified MNES</li> <li>Appendix S provides a recent PMST report</li> <li>Section 5.1 (Overview) provides consideration for the recent PMST report</li> </ul>
2.1	Additional information on listed and threatened bird species and listed migratory species	<p>a) Additional information on all listed, threatened and migratory bird species must include but may not be limited to:</p> <ol style="list-style-type: none"> <li>The status of populations (for example, abundance) that occur in, adjacent to, or may transit or overfly, the project area. This must include listed species that transit or overfly the project area on route to another location.</li> <li>Assessment of habitat occurring within, or adjacent to, the project area, and its importance (including habitat utilisation) in a local, regional, national and international context.</li> <li>Assessment of site utilisation for each of the bird species including foraging, roosting, transiting, resting and nesting habitats, and migratory flight paths across the site. This must include frequency, time of day/night, numbers and time of year, particularly with regard to migratory overflying.</li> <li>Include a discussion on vegetation composition and structure in relation to the development footprint, project area and broader region. The presence, extent and density (including foliage cover and flowering density) of all plant species that provide foraging, including non-native food sources.</li> <li>Provide detailed mapping of suitable habitat for all listed threatened or migratory bird species which: <ol style="list-style-type: none"> <li>Is specific to the habitat assessment undertaken for each bird species.</li> <li>Includes an overlay of the updated proposed action disturbance footprint.</li> </ol> </li> </ol>	<ul style="list-style-type: none"> <li>Section 5.2 (Additional information on listed threatened bird species and listed migratory species) provides additional information on listed threatened bird species and listed migratory species</li> <li>Section 5.2 (Additional information on listed threatened bird species and listed migratory species) provides additional information on foraging habitat for listed threatened bird species and listed migratory species</li> <li>Section 5.2 (Additional information on listed threatened bird species and listed migratory species) provides additional information on transiting and flight paths for listed threatened bird species and listed migratory species</li> </ul>

No.	Issue	DCCEEW request for additional information (Appendix A)	Preliminary documentation (Rev 1) reference
		<ul style="list-style-type: none"> <li>c. Includes known records of individuals derived from desktop analysis, including from SPRAT database and field surveys.</li> <li>d. Include habitat that is within and adjacent to the proposed action to provide regional context.</li> <li>e. Include a map of all water bodies (including farm dams/ troughs, etc.) within the development footprint, project area and broader region, with an overlay of the different habitat features (e.g., breeding, foraging, dispersal).</li> <li>f. Identification of permanent or seasonal water bodies or watercourses within twelve (12) kilometres of the disturbance footprint to demonstrate the use of different habitat features.</li> <li>g. Discuss the suitability of the water sources for each of the species (e.g., rate of water movement, potability for birds, access).</li> <li>h. Include mapping of nearby conservation areas (e.g. National Parks, Nature Reserves, Nature refuges, etc.) and road reserves and describe how these different habitats are utilised for each of the species (e.g. breeding, foraging, roosting).</li> <li>i. Images provided separately as attachments in JPEG format.</li> <li>vi. Details of the foraging habitat available to each bird species, and the impact the proposed action will have on the ability for species to utilise this habitat.</li> <li>vii. Details of the flight characteristics and behaviours of the listed birds species, specifically with regard to occupying or overflying the project area within the rotor swept area and transmission lines.</li> <li>viii. Where there is a lack of certainty, an assessment of the confidence with which any claims are made.</li> </ul> <p>(Please note Department considers at least two years surveys are needed to adequately assess utilisation)</p>	<ul style="list-style-type: none"> <li>• Section 5.3 (Carnaby's cockatoo specific assessment) provides additional information on Carnaby's cockatoo</li> <li>• Section 5.3 (Carnaby's cockatoo specific assessment) provides additional information on foraging habitat for Carnaby's cockatoo</li> <li>• Section 5.3 (Carnaby's cockatoo specific assessment) provides additional information on flight characteristics and behaviours for Carnaby's cockatoo</li> <li>• Section 6.1 (Key potential impacts) assesses impacts to foraging habitat for threatened and migratory bird species</li> <li>• Figure K (Migrating wader habitat) presents detailed mapping of suitable habitat for Curlew sandpiper, Sharp-tailed sandpiper, Pectoral sandpiper and Common sandpiper</li> <li>• Figure L (Fork tailed swift habitat) presents detailed mapping of suitable habitat for Fork-tailed swift</li> <li>• Figure M (Carnaby's cockatoo occurrence records) presents detailed mapping of known records of individuals derived from desktop analysis and surveys</li> <li>• Figure N (Carnaby's cockatoo breeding and roosting habitat) presents detailed mapping of suitable breeding and roosting habitat for Carnaby's cockatoo</li> <li>• Figure O (Carnaby's cockatoo foraging habitat) presents detailed mapping of suitable foraging habitat for Carnaby's cockatoo</li> </ul>
2.1.1	Habitat assessment for migratory species	<p>The Preliminary Documentation must include a detailed habitat assessment for each of the listed migratory species which will be or is likely to be impacted by the proposed action. Survey data more than five years old may be used as supplementary supporting evidence; however, due to continual changes in populations of species, recent survey data is required. Assessments must be informed by desktop and field surveys (in accordance with departmental guidelines or as defined by best practice surveys), and with reference to relevant departmental documents (e.g., approved Conservation Advice, Recovery Plans, draft referral guidelines and Listing Advice, and SPRAT Database), including published research and other relevant sources.</p> <p>Attach all relevant ecological surveys referenced in the referral and preliminary documentation as supporting documents to the preliminary documentation. Include information related to:</p> <ul style="list-style-type: none"> <li>i. Survey effort</li> <li>ii. Time of day surveyed; and</li> <li>iii. Number of individual recorded per survey (include incidental observations)</li> </ul> <p>Surveys must be conducted to reasonably cover the disturbance footprint, adjacent areas, and include any possible micro-site locations to capture the significance of the habitat and capture the regional context.</p> <p>Provide relevant information on any consultation undertaken with experts regarding migratory birds.</p>	Section 5.2 (Additional information on listed threatened bird species and listed migratory species) provides additional information on listed migratory species
2.1.2	Carnaby's black cockatoo specific assessment	<p>The Preliminary Documentation must include a detailed habitat assessment for Carnaby's Black Cockatoos (CBC). A general fauna habitat assessment was provided with the referral documentation and additional information about the quality of the foraging habitat, the availability of breeding habitat for CBC is required, including:</p> <ul style="list-style-type: none"> <li>i. Provide the results/scores of a habitat quality assessment using methodology that recognises key habitat characteristics specific to CBC foraging habitat requirements and values. The values from the scoring system for the assessment of foraging value of vegetation for CBC must be supported with clear evidence. Relevant habitat characteristics and associated methodology needs to be documented. It is recommended that you use</li> <li>ii. Provide further information on breeding habitat trees. The Referral guideline for 3 WA threatened black cockatoo species notes that trees suitable to develop a nest hollow in the future are 30-50 cm DBH. Provide details (number, type and size) of trees with DBH &gt; 30cm. Provide details (number, type and size) of potential roosting trees.</li> <li>iii. Provide details of trees (number, type and size) with a diameter at breast height (DBH) within 12 km radius from the perimeter of the project area. <ul style="list-style-type: none"> <li>a. Discuss the distance of the closest breeding site from the proposed action site, the species using the breeding site, the size of the breeding site (number of trees and area in ha), and estimated number of breeding pairs that use the site.</li> </ul> </li> <li>iv. Provide further information on the role of the site in maintaining habitat connectivity and supporting CBC movement through the landscape.</li> <li>v. Provide a mapped area including a 12 km radius from the perimeter of the project area. The map must include: <ul style="list-style-type: none"> <li>a. Potential habitat (vegetation cover that could include vegetation types likely to include species suitable for foraging, breeding and/or roosting habitat).</li> <li>b. Suitable watering habitat, based on the best available information.</li> <li>c. Conservation areas (areas with ongoing conservation protection on the title of the land, under an enduring protection mechanism).</li> <li>d. Migration and key seasonal movement patterns of CBC flocks, relative to the project area (based on best available information).</li> <li>e. Known areas of aggregation/key habitats areas.</li> </ul> </li> <li>vi. Provide a description of methodology, source data and any other relevant evidence used to create the maps.</li> </ul>	<ul style="list-style-type: none"> <li>• Section 5.3 (Carnaby's cockatoo specific assessment) provides additional information on Carnaby's cockatoo</li> <li>• Section 15 (Information sources) provides descriptions of the source data and methodology to create figures</li> <li>• Figure M (Carnaby's cockatoo occurrence records) presents detailed mapping of known records of individuals derived from desktop analysis and surveys</li> <li>• Figure N (Carnaby's cockatoo breeding and roosting habitat) presents detailed mapping of suitable breeding and roosting habitat for Carnaby's cockatoo</li> <li>• Figure O (Carnaby's cockatoo foraging habitat) presents detailed mapping of suitable foraging habitat for Carnaby's Cockatoo</li> <li>• Appendix C (Carnaby's Black-Cockatoo and Fork-tailed Swift utilisation survey report)</li> <li>• Appendix V (Confirmed and potential breeding trees) presents a list of confirmed and breeding trees within 12 km radius of the Project Area</li> </ul>

No.	Issue	DCCEEW request for additional information (Appendix A)	Preliminary documentation (Rev 1) reference
		vii. Survey data more than five years old may be used as supplementary supporting evidence; however, due to continual changes in populations of species, recent survey data is required	Section 5.3 (Carnaby's cockatoo specific assessment) provides information on the Carnaby's Black-Cockatoo and Fork-tailed Swift utilisation survey (BCE 2025) which was undertaken between August 2024 to January 2025
2.2	Habitat Assessment for flora	<p>The Preliminary Documentation must include a detailed habitat assessment for each of the listed threatened flora species and ecological community which will be or is likely to be impacted by the proposed action. Survey data more than 5 years old may be used as supplementary supporting evidence; however, due to continual changes in populations of species, recent survey data is required. Assessments must be informed by desktop and field surveys (in accordance with departmental guidelines or as defined by best practice surveys), and with reference to relevant departmental documents (e.g., approved Conservation Advice, Recovery Plans, draft referral guidelines and Listing Advice, and SPRAT Database), including published research and other relevant sources.</p> <p>Attach all relevant ecological surveys referenced in the referral and preliminary documentation as supporting documents to the preliminary documentation. Include information related to:</p> <ol style="list-style-type: none"> <li>Survey effort</li> <li>Time of day surveyed; and</li> <li>Number of individuals recorded per survey (include incidental observations)</li> </ol> <p>Surveys must be conducted to reasonably cover the disturbance footprint, adjacent areas, and include any possible micro-site locations to capture the significance of the habitat and capture the regional context.</p> <p>Provide relevant information on any consultation undertaken with experts regarding protected matters, such as listed threatened species and communities.</p>	Section 5.4 (Habitat assessment for flora and community) provides a habitat assessment for the identified threatened flora species and ecological community
2.2.1	Banksia TEC	<p>The referral form states that 0.3 ha of Banksia TEC will be impacted by the proposed action. With reference to the Conservation Advice, address the following:</p> <ol style="list-style-type: none"> <li>Provide the size and condition of the larger patch that the 0.3 ha is within. Survey the patch extending outside of the project area to provide a regional context.</li> <li>Provide an analysis as to whether the wider patch remains a TEC with the removal of the 0.3 ha within the project area.</li> <li>The referral application notes that the 0.3 ha is in 'Excellent to Good to Very Good condition'. The supplementary flora, vegetation, and fauna survey (Att15) identified 5.05 ha of Banksia Low Open Woodland vegetation units in 'Excellent' condition. Please confirm the condition of the 0.3 ha.</li> <li>Provide the Floristic Community Type of the Banksia TEC.</li> <li>Provide a regional context map showing the extent of the Banksia TEC.</li> </ol>	<ul style="list-style-type: none"> <li>Section 5.4.1 (Banksia woodland of the Swan Coastal Plain Threatened Ecological Community)</li> <li>Figure I (Banksia Woodlands of the Swan Coastal Plain Threatened Ecological Community) presents a regional context map for the Banksia Woodlands of the Swan Coastal Plain TEC</li> </ul>
2.2.2	Star sun-orchid	<p>Discuss the habitat and number of individuals of Star Sun-orchid (<i>Thelymitra stellata</i>) in the development footprint, and project area. Include a discussion on the habitat and how it aligns with the Star Sun-orchid Conservation Advice in the immediate region.</p> <ol style="list-style-type: none"> <li>Conduct a targeted surveys for Star Sun-orchid in accordance with the Draft Survey Guidelines for Australia's Threatened Orchids found at Table C Item 2.4d. Surveys should be during the flowering seasons within the development footprint, project area and broader region to provide a greater understanding of the occurrence of the species.</li> <li>Weather and climate conditions must be recorded for all surveys and the periods leading up to surveys as the orchid does not flower every year and may remained closed during cool and overcast weather opening only in warm, sunny weather.</li> <li>Provide a map that clearly demonstrates the extent of the orchid with an overlay of the different habitat features within and adjacent to the project area.</li> <li>Discuss the relationships between the habitat, the surveyed individuals, the development footprint, the likely need to support the genetic connectivity between the known and likely occurrences of the orchid across the distribution and broader regions.</li> </ol>	<ul style="list-style-type: none"> <li>Section 5.4.2 (Star sun-orchid) provides the findings of the Targeted star sun-orchid and sandplain duck orchid searches (RPS 2025). The search was undertaken from 21 to 24 October 2024, during the peak detectability month of October in accordance with the draft Survey Guidelines for Australia's Threatened Orchids (Commonwealth of Australia 2013).</li> <li>Section 5.4.2 (Star sun-orchid) provides the weather and climate conditions for the Reconnaissance flora and vegetation survey (RPS 2023) and the Targeted star sun-orchid and sandplain duck orchid searches (RPS 2025)</li> <li>Figure C (Star sun orchid habitat) presents a consolidated map of records and habitat features for Star sun orchid</li> <li>Appendix E (Targeted star sun orchid and sandplain duck orchid searches) provides weather and climate conditions for the periods leading up to the survey and during the survey</li> <li>Appendix G (Reconnaissance flora and vegetation assessment) provides weather and climate conditions for the periods leading up to the survey</li> </ul>
2.2.3	Dwarf green kangaroo paw	<p>Discuss the habitat and number of individuals of Dwarf Green Kangaroo Paw (<i>Anigozanthos viridis</i> subsp. <i>Terraspectans</i>) in the development footprint, project area and immediate region. The Reconnaissance Flora and Vegetation Assessment identified the occurrence of Dwarf Green Kangaroo Paw flora species in the development envelope. However, no information was provided on the species location, the numbers in the area, or the occurrences in relation to the Disturbance Area.</p> <ol style="list-style-type: none"> <li>Discuss the habitat and the number of surveyed individuals in relation to the development footprint, and project area.</li> <li>Discuss this population within the context of the immediate region.</li> <li>Include a map of surveyed individuals with an overlay of the different habitat features within and adjacent to the project area.</li> <li>Discuss the potential impacts to the species and if the proposed action is likely to adversely affect habitat critical to the survival of the species in alignment with the approved Conservation Advice for <i>Anigozanthos viridis</i> subsp. <i>terraspectans</i> (Dwarf Green Kangaroo Paw).</li> <li>If required, conduct targeted surveys for Dwarf Green Kangaroo Paw and its habitat in accordance with the Environmental Protection Authority (EPA) (2016a) Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment, December 2016.</li> <li>Surveys need to be conducted when it flowers between August and December, in line with Conservation Advice.</li> </ol>	Section 5.4.3 (Dwarf green kangaroo paw)
2.2.4	Lesueur hakea	<p>Discuss the habitat and number of individuals of Lesueur Hakea (<i>Hakea megalosperma</i>) in the development footprint, project area and immediate region. The Reconnaissance Flora and Vegetation Assessment identified the occurrence of Lesueur Hakea (<i>Hakea megalosperma</i>) flora species in the development envelope. However, no information was provided on the species location, the numbers in the area, or the occurrences in relation to the Disturbance Area. The possible impact on this listed flora species has not been addressed in the referral documentation.</p>	Section 5.4.4 (Lesueur hakea)



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		<ul style="list-style-type: none"> <li>i. Include a map of surveyed individuals with an overlay of the different habitat features within and adjacent to the project area.</li> <li>ii. Discuss the habitat and the number of surveyed individuals in relation to the development footprint, project area and immediate region.</li> <li>iii. Discuss the potential impacts to the species and if the proposed action is likely to adversely affect habitat critical to the survival of the species in alignment with the approved Conservation Advice for Hakea megalosperma (Lesueur Hakea).</li> <li>iv. Surveys for Lesueur Hakea and its habitat must be conducted in accordance with the Environmental Protection Authority (EPA) (2016a) Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment, December 2016.</li> </ul>	
2.2.5	Sandplain duck orchid	<p>The department notes that the Reconnaissance Flora and Vegetation Assessment did not identify these species within the development envelope; however, suitable vegetation types occur within the development envelope. The department considers that these species of orchids may not emerge each year if conditions are not favourable, can be cryptic and sometimes multiple survey efforts may be required to conclude likely absence. Targeted surveying is required to conclude with confidence whether the Sandplain Duck Orchid and Glossy-leafed Hammer Orchid are absent from the project area.</p> <ul style="list-style-type: none"> <li>i. Conduct targeted surveys for the Sandplain Duck Orchid, the Glossy-leafed Hammer Orchid and their habitats within the development footprint, project area and broader region in accordance with the Draft Survey Guidelines for Australia's Threatened Orchids found at Table C Item 2.4d.</li> <li>ii. If follow up surveys detect the species: <ul style="list-style-type: none"> <li>a. Provide information about population size and the number of individuals that will be directly and indirectly impacted by the proposed action as well as habitat quality for the development footprint, project area and broader region.</li> <li>b. Include a map of surveyed individuals with an overlay of the different habitat features within and adjacent to the project area.</li> </ul> </li> </ul>	Section 5.4.5 (Sandplain duck orchid)
	Glossy-leafed hammer orchid	<p>The department notes that the Reconnaissance Flora and Vegetation Assessment did not identify these species within the development envelope; however, suitable vegetation types occur within the development envelope. The department considers that these species of orchids may not emerge each year if conditions are not favourable, can be cryptic and sometimes multiple survey efforts may be required to conclude likely absence. Targeted surveying is required to conclude with confidence whether the Sandplain Duck Orchid and Glossy-leafed Hammer Orchid are absent from the project area.</p> <ul style="list-style-type: none"> <li>i. Conduct targeted surveys for the Sandplain Duck Orchid, the Glossy-leafed Hammer Orchid and their habitats within the development footprint, project area and broader region in accordance with the Draft Survey Guidelines for Australia's Threatened Orchids found at Table C Item 2.4d.</li> <li>ii. If follow up surveys detect the species: <ul style="list-style-type: none"> <li>a. Provide information about population size and the number of individuals that will be directly and indirectly impacted by the proposed action as well as habitat quality for the development footprint, project area and broader region.</li> <li>b. Include a map of surveyed individuals with an overlay of the different habitat features within and adjacent to the project area. Refer</li> </ul> </li> </ul>	Section 5.4.6 (Glossy-leafed hammer orchid)
3	Relevant impacts	<p>The preliminary documentation must include an assessment of potential impacts (including direct, indirect, facilitated and cumulative impacts) that may occur as a result of all elements and proposed action phases of the proposed action (e.g. construction, post-construction and operation) on the MNES addressed at Section 2.</p> <p>Consideration of impacts must not be confined to the immediate area of the proposed action but must also consider the potential of the proposed action to impact on adjacent areas that are likely to contain populations of, or habitat for, MNES.</p> <p>The preliminary documentation must include:</p> <ul style="list-style-type: none"> <li>a) A description of all components of the action, including: <ul style="list-style-type: none"> <li>i. A description of all associated activities.</li> <li>ii. A description of the operational requirements of the action including any anticipated maintenance works.</li> <li>iii. The timing and duration of each component of the proposed action including decommissioning (anticipated start and completion dates).</li> <li>iv. Clarification of any changes made to the proposed action since the referral documentation.</li> </ul> </li> <li>b) A detailed assessment of the nature, extent, likelihood and consequence of the likely short-term and long-term impacts associated with the proposed action on each MNES, including but may not be limited to: <ul style="list-style-type: none"> <li>i. Analysis of the impacts associated with the proposed action, including fragmentation of the habitat in the proposed disturbance area and possible impacts on breeding success;</li> <li>ii. Provide information on the impacts of habitat loss and habitat degradation (e.g. cropping habitat and breeding trees for transmission line clearance).</li> <li>iii. Direct and indirect impacts of the wind turbines and related infrastructure on MNES species.</li> <li>iv. Include a discussion of the wind resources on site noting the presence of potential updrafts/thermal wind currents.</li> <li>v. Provide information on the wind turbines that will be used. Include: turbine height, turbine blade length, turbine blade ground clearance, rotor swept area, and any component that will be included to minimise strikes or barotrauma.</li> <li>vi. Provide information on transmission lines that will be used. Discuss the benefits of above ground versus below and reasons for the pathway of the transmission lines. Include information on the transmission lines and tower set up, line upper height, line lower height, the clearance required under the lines, location of each component of the transmission lines and equipment, and any component that will be included to minimise strikes or electrocution.</li> <li>vii. Based on utilisation studies, collision risk from turbines including clear mathematical modelling explaining how you have assessed the risk of collision for each species. Modelling must be based on best available data and should include flight behaviour, movement (migratory pathways) patterns, the potential attribution of relative risk to individual turbines or clusters of turbines, and the variation in the risk of collision across the site;</li> <li>viii. Low air pressure zones around the blades effecting the behaviour of protected species;</li> <li>ix. Alienation and landscape sterilisation (i.e. Behavioural avoidance of species to habitat near turbines, at various temporal and spatial scales);</li> <li>x. The impact of shadow "flicker", blade "glint", blade throw and night lighting; and</li> <li>xi. Analysis of the volume, composition, origin, destination and route for vehicle movements and other traffic likely to be generated during construction and operational phases, including a breakdown for over-dimension and heavy vehicles and erosion from road construction.</li> <li>xii. An assessment of noise impact on each MNES associated with construction and operation of the proposed action, including a description of all relevant impacts at various wind speeds, temporal and spatial variables and under various meteorological scenarios (including varying atmospheric stability classes);</li> </ul> </li> </ul>	<p>Section 6 (Impact Assessment) provides an assessment of potential direct, indirect and cumulative impacts</p> <p>Section 6 (Impact Assessment) provides an assessment of potential indirect impacts to adjacent areas</p> <p>Section 1.3 (Proposed action details) provides a description of the proposed action</p> <p>Section 6 (Impact Assessment) provides an assessment of potential direct, indirect and cumulative impacts, including a turbine specific impact assessment</p>



No.	Issue	DCCEEW request for additional information (Appendix A)	Preliminary documentation (Rev 1) reference
		<p>c) A detailed assessment of the actual and potential impacts on MNES including:</p> <ol style="list-style-type: none"> <li>A statement on whether any relevant impacts are likely to be unknown, unpredictable, irreversible or sub-lethal (reversible over time) and what confidence level is placed on the predictions of relevant impacts.</li> <li>An analysis of the significance of the relevant impacts.</li> <li>Consideration of potential impacts throughout the life of the proposal – from construction through to operation and decommissioning.</li> <li>A discussion of the potential impacts, considering how the interaction of extreme environmental events (for example: cyclones, flood events) and any related cumulative impacts may impact on the proposal and the environment (both independently and cumulatively).</li> <li>Discuss the risk of fire and any fire management strategies that will be implemented (e.g. fire breaks) and how they may impact MNES species.</li> <li>The framework used to assess impacts, including risk assessment processes, based on best available practice;</li> </ol> <p>d) A risk assessment of changing climate patterns that may affect the proposal and surrounding environment and a description of the preferred and alternative adaptation strategies to be implemented;</p> <p>e) Discuss the presence and prevalence of plant diseases (such as dieback disease <i>Phytophthora</i> spp., or any other plant diseases).</p> <p>f) Full justification of all discussions and conclusions based on the best available information, including relevant conservation advices, recovery plans, threat abatement plans and guidance documents, should be included if applicable. Departmental documents regarding listed threatened species can be found at: <a href="http://www.environment.gov.au/cgi-bin/sprat/public/sprat.pl">http://www.environment.gov.au/cgi-bin/sprat/public/sprat.pl</a></p>	<ul style="list-style-type: none"> <li>Section 6 (Impact Assessment) provides an assessment of potential direct, indirect and cumulative impacts</li> <li>Appendix Y provides individual significant impact assessments for each MNES</li> </ul> <p>Section 6.2 (Other potential operational impacts) provides a high-level assessment of the other potential impacts to MNES, include those linked to climate change (i.e. bushfire)</p> <p>Section 6.2 (Other potential operational impacts) provides a high-level assessment of the other potential impacts to MNES, include those linked to <i>Phytophthora</i> dieback</p> <p>Section 12 (National and international obligations) identifies other published Commonwealth guidance material and its relationship to the proposed action</p>
4	Proposed avoidance and mitigation measures	<p>Avoidance and mitigation measures are the primary methods of eliminating and reducing significant impacts on MNES. Where possible and practicable it is best to avoid impacts. If impacts cannot be avoided, then they should be minimised or mitigated as much as possible. Avoidance and mitigation measures must be investigated thoroughly as a part of the assessment and be supported by evidence to demonstrate likely success.</p> <p>The preliminary documentation must include detailed descriptions of measures proposed to be undertaken by the proponent to avoid, minimise and manage relevant impacts of the proposed action on the listed MNES species. The proposed measures should be based on best available practices, appropriate standards and supported by scientific evidence and must include the following elements:</p> <ol style="list-style-type: none"> <li>Identify and describe potential alternatives and proposed design options (e.g. Turbine models and configurations (including height, blade length and generator models); and mitigation measures, which could avoid or minimise significant impacts on listed birds species, and clearly state which avoidance or mitigation measure will be committed to;</li> <li>Assessment of the expected or predicted effectiveness of the proposed mitigation measures;</li> <li>Any statutory or policy basis for the proposed mitigation measures, including reference to approved conservation advices relevant to the listed threatened species, and discussion on how the proposed mitigation measures are not inconsistent with recovery plans and threat abatement plans relevant to the listed threatened species and communities;</li> <li>Evidence to support the basis for proposed mitigation measures and their likely effectiveness;</li> <li>Any mitigation measures proposed to be undertaken by state and local governments;</li> <li>Details of ongoing management, including monitoring programs to support an adaptive management approach and determine the effectiveness of the measures proposed</li> <li>The name of the agency responsible for endorsing or approving each mitigation measure or monitoring program.</li> </ol> <p>The preliminary documentation must include a revised Bird and Bat Management Plan (BBMP) that sets out the framework for management, mitigation and monitoring of relevant impacts of the action, including any provisions for independent environmental auditing.</p> <p>The revised BBMP must state the environmental objectives, performance criteria, monitoring, reporting, corrective actions, responsibility and timing for each MNES in each stage. The BBMP must be prepared in accordance with the Department's Environmental Management Plan Guidelines (2014), available at <a href="http://www.environment.gov.au/epbc/publications/environmental-management-plan-guidelines">www.environment.gov.au/epbc/publications/environmental-management-plan-guidelines</a></p> <p>The preliminary documentation must include detailed descriptions of the proposed avoidance, mitigation and management measures that will be implemented:</p> <ol style="list-style-type: none"> <li>During the design, construction, operation, maintenance, and decommissioning stages of the proposed action.</li> <li>To address the presence, introduction or spread of plant diseases, weeds and feral pests.</li> </ol> <p>The proposed measures must be based on best available practices, appropriate standards, evidence of success for other similar actions and supported by published scientific evidence. With consideration of the construction, operation and maintenance stages of the proposed action, the Preliminary Documentation must include:</p> <ol style="list-style-type: none"> <li>Details of specific and measurable environmental outcomes to be achieved for relevant MNES;</li> <li>Details of the proposed measures to be undertaken to avoid, mitigate and manage the relevant impacts of the proposed action, including those required through other Commonwealth, State and local government approvals;</li> <li>The use of committed language (e.g. 'will' and 'must') when describing the proposed measures;</li> <li>An assessment of the expected or predicted effectiveness of the proposed measures;</li> <li>Any statutory or policy basis for the proposed measures, including reference to the SPRAT Database and relevant approved conservation advices, and a discussion on how the proposed measures are not inconsistent with relevant recovery plans and threat abatement plans;</li> <li>Details of ongoing management, including monitoring programs to support an adaptive management approach, validate the effectiveness of the proposed measures and overall demonstrate that the environmental outcomes will be achieved;</li> <li>Details of tangible, on-ground corrective actions that will be implemented in the event the monitoring programs indicate that the environmental outcomes have not or will not be achieved;</li> <li>Details of measures, if any, proposed to be undertaken by Western Australia Government, Local Governments, including the name of the agency responsible for approving each measure; and</li> </ol>	<p>Section 7 (Proposed avoidance and mitigation measures) identifies avoidance, minimisation, mitigation and monitoring requirements</p> <p>Appendix Z provides the draft Bird and Bat Management Plan</p> <p>Section 7 (Proposed avoidance and mitigation measures) identifies avoidance, minimisation, mitigation and monitoring requirements</p>

No.	Issue	DCCEEW request for additional information (Appendix A)	Preliminary documentation (Rev 1) reference
		<p>ix. Information on the timing, frequency and duration of the proposed avoidance, mitigation, management and monitoring measures, and corrective actions to be implemented.</p> <p>Avoidance and mitigation measures may be provided in an Environmental Management Plan (EMP). If you provide this information in an EMP then the plan must set out the framework for management, mitigation and monitoring of relevant impacts, including any provisions for independent environmental auditing. The plan must be prepared in accordance with the department's Environmental Management Plan Guidelines (2014) available at: <a href="http://www.environment.gov.au/epbc/publications/environmental-management-plan-guidelines">www.environment.gov.au/epbc/publications/environmental-management-plan-guidelines</a>. The SPRAT Database, and associated statutory documents, may provide relevant mitigation measures for listed threatened species and ecological communities and listed migratory species. All proposed measures for MNES must consider the 'S.M.A.R.T.' principle:</p> <ul style="list-style-type: none"> <li>• S – Specific (what and how)</li> <li>• M – Measurable (baseline information, number/value, auditable)</li> <li>• A – Appropriate and Achievable (timeframe, money, personnel)</li> <li>• R – Relevant (conservation advices, recovery plans, threat abatement plans)</li> <li>• T – Time-bound (specific timeframe to complete) Further detailed guidance is provided below.</li> </ul>	N/A. An EMP has not been provided
5	Residual impacts and proposed offsets	<p>Describe the residual impacts on MNES that are likely to occur as a result of the proposed action in its entirety, after proposed avoidance and mitigation measures are taken into account. If applicable, this should include the reasons why avoidance or mitigation of impacts cannot be reasonably achieved.</p> <p>If residual impacts are likely to be significant, please provide an offset package to compensate for residual impacts to MNES. This should consist of an offset proposal and key commitments and management actions to deliver and implement a proposed offset (i.e. an Offset Management Plan).</p> <p>Offsets must directly contribute to the ongoing viability of the threatened and migratory species. It must deliver an overall conservation outcome that improves or maintains the viability of the protected matter, as compared to what is likely to have occurred if neither the action nor the offset had taken place. The offset proposal should demonstrate how the conservation outcome will be delivered for the protected matter.</p> <p>The proposed offset must meet the requirements of the Department's EPBC Act Environmental Offsets Policy (October 2012) available at: <a href="http://www.environment.gov.au/epbc/publications/epbc-act-environmental-offsets-policy">www.environment.gov.au/epbc/publications/epbc-act-environmental-offsets-policy</a>.</p> <p>The Department's Offset Assessment Guide may be used as a guide to estimate the area of offset required to adequately compensate for the residual impacts of the proposed action, it is available at: <a href="http://www.environment.gov.au/epbc/publications/epbc-act-environmental-offsets-policy">www.environment.gov.au/epbc/publications/epbc-act-environmental-offsets-policy</a>.</p> <p>The Department will assess the offset based on the information provided in the offsets proposal using the offsets assessment guide.</p> <p>The preliminary documentation must include an Offset Strategy that:</p> <ol style="list-style-type: none"> <li>Describes the offset site(s) including location, size, condition and environmental values.</li> <li>Details of the surveys undertaken in accordance with the survey guidelines used to confirm the presence of the protected matter at the offset site.</li> <li>Details of the quality of the offset site including a vegetation condition assessment (VCA) and habitat characteristics for the protected matter.</li> <li>Details of threats to the protected matter at the offset site and how those threats will be mitigated.</li> <li>A comparison of the environmental values as compared to the impact site.</li> <li>Explain how the offset package addresses the principles of the EPBC Act Environmental Offsets Policy.</li> <li>The specific environmental outcomes to be achieved and maintained for the duration of the impact.</li> <li>Details on how the offset will be secured, managed and monitored to meet these environmental outcomes, including: <ol style="list-style-type: none"> <li>Management actions, performance targets, monitoring methodology and review criteria.</li> <li>Responsibility and timing for implementation of actions.</li> </ol> </li> </ol> <p>Please note, in all cases, targets and criteria should be specific and measurable.</p> <p>Offsets required by the state can contribute to offset obligations under the EPBC Act if those offsets also meet the requirements of the EPBC Act Environmental Offsets Policy.</p> <p>If relevant, please provide demonstrated engagement with any third parties engaged to deliver the proposed offset (including the proposed landowner of the offset site and any entity providing a security mechanism for the offset), and confirmation that those third parties are able to deliver the aspects of the proposed offset for which they are responsible, as described in the offset management plan.</p>	<p>Section 8 (Residual impacts and proposed offsets) identifies the residual impacts to MNES</p> <p>An Offset Management Strategy (Surefire Environmental Pty Ltd 2025; Appendix AA) has been prepared to counterbalance the loss of Carnaby's cockatoo foraging, potential breeding and potential roosting habitat attributable to the Proposed Action, that are not able to be otherwise avoided or mitigated onsite. The Offset Management Strategy includes an offset proposal, commitments and management actions to deliver and implement a direct offset.</p> <p>A more detailed Offset Management Plan will be prepared and provided to DCCEEW prior to final determination to align the anticipated offset requirements under Commonwealth and State approval applications.</p>
6	Other approvals and conditions	<p>The preliminary documentation must include information on any other requirements for approval or conditions that apply, or that you reasonably believe are likely to apply, to the proposed action. This must include:</p> <ol style="list-style-type: none"> <li>A description of any approval obtained or required to be obtained from a State or Commonwealth agency or authority (other than an approval under the EPBC Act), including any conditions that apply to the proposed action.</li> <li>A description of the monitoring, enforcement and review procedures that apply, or are proposed to apply, to the action.</li> </ol>	Section 9 (Other statutory approvals) identifies other Commonwealth and State statutory approvals, and the monitoring, enforcement and review procedures, required for the proposed action required for the proposed action
7	Social and economic impacts	<p>The proponent must provide a discussion and analysis of the social and economic impacts of the proposed action, both positive and negative, in the preliminary documentation. Economic and social impacts should be considered at the local, regional and national levels. Matters of interest may include:</p> <ol style="list-style-type: none"> <li>Details of any public consultation activities undertaken, and their outcomes;</li> <li>Details of any consultation with indigenous stakeholders;</li> <li>Proposed actioned economic costs and benefits of the proposed action (in dollars), including the basis for their estimation through cost/benefit analysis or similar studies; and</li> <li>Employment opportunities expected to be generated by the proposed action (including construction and operational phases)</li> <li>Proposed actioned public benefits expected to be generated by the proposed action.</li> </ol>	Section 10.2 (Economic cost and benefits) discusses the social and economic impacts of the proposed action

## APPENDIX

No.	Issue	DCCEEW request for additional information (Appendix A)	Preliminary documentation (Rev 1) reference
8	Ecologically sustainable development	Please include a discussion of how the proposed action will conform to the principles of ESD. To assist you, the National Strategy for Ecologically Sustainable Development (1992) is available at: <a href="http://www.environment.gov.au/about-us/esd/publications/national-esd-strategy">http://www.environment.gov.au/about-us/esd/publications/national-esd-strategy</a> .	Section 11 (Ecologically sustainable development) discussion of how the proposed action will conform to Ecologically sustainable development principles
9	Consistency with national and international obligations	Justify, with supporting evidence, how the proposed action will not be inconsistent with Australia's obligations under: <ol style="list-style-type: none"> <li>Environment Protection Biodiversity Conservation Act 1999,</li> <li>EPBC Act Policy Statements, and guidelines.</li> <li>Any recovery plan or threat abatement plan for the species.</li> <li>The Bonn Convention;</li> <li>China-Australia Migratory Bird Agreement;</li> <li>Japan-Australia Migratory Bird Agreement;</li> <li>International Agreement – Republic of Korea-Australia Migratory Bird Agreement; and</li> <li>Any international agreement approved under subsection 209(4) of the EPBC Act.</li> </ol>	Section 12 (National and international obligations) identifies other published Commonwealth guidance material and its relationship to the proposed action
10	Environmental record	Please provide the following information if updated from that provided with the referral document, details of any proceedings under a Commonwealth, state or territory law for the protection of the environment or the conservation and sustainable use of natural resources against: <ul style="list-style-type: none"> <li>The person proposing to take the action.</li> </ul> If the person proposing to take the action is a corporation, details of the corporation's environmental policy and planning framework must also be included.	N/A
11	Conclusion	The preliminary documentation must provide an overall conclusion as to the environmental acceptability of the proposal, including discussion on compliance with the principles of Ecologically Sustainable Development (ESD) and the objects and requirements of the EPBC Act. To assist you, the National Strategy for Ecologically Sustainable Development (1992) is available on the following web site: <a href="https://www.environment.gov.au/about-us/esd/publications/national-esd-strategy">https://www.environment.gov.au/about-us/esd/publications/national-esd-strategy</a> .  You may wish to include a statement as to whether or not the controlled action should be approved and may recommend conditions pertaining to an approval. This should include justification for undertaking the proposed action in the manner proposed. The measures proposed or required by way of offset for any unavoidable impacts on MNES and the relative degree of compensation, should be restated here.	Section 13 (Conclusion) discusses the environmental acceptability of the proposal, provides a statement identifying that the controlled action should be approved and recommends conditions
12	Information sources	The preliminary documentation must state for the information provided, the following: <ol style="list-style-type: none"> <li>The source and currency (date) of the information.</li> <li>How the reliability of the information was tested.</li> <li>The uncertainties (if any) in the information.</li> <li>The guidelines, plans and/or policies considered.</li> </ol>	Section 15 (Information sources) provides the references