21 November 2025

pgv ENVIRONMENTAL

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ABN 44 981 725 498
Knightside Nominees Pty Ltd

Kellie Johnson

Project Officer (Waste Services)
City of Rockingham
PO Box 2142
Rockingham DC WA 6967

Dear Kellie,

RE: Millar Road Landfill Redevelopment –Tree Assessment Stage 1 and 2

Following is our assessment of trees in the Stage 1 and 2 area on the Millar Road Landfill site. The Stage 1 works have been completed and the proposed Stage 2 works include a new access road and formalising a staff carpark.

1 Methodology

Dr Paul van der Moezel of PGV Environmental undertook a vegetation assessment on 11 December 2023 and 8 July 2025. The assessment included recording any native vegetation (trees, shrubs, herbs) and assessing the native trees in the area.

The following information was recorded for each tree assessed:

- Species
- Location
- Height
- DBH (1.3m above ground)
- Tree health
- Presence of hollows

2 Site Description

The site contains some native trees, mostly standing alone and with a few in small clumps, as well as some non-native trees and shrubs. There were no native shrubs or herbs in the understorey. Therefore, the condition of the vegetation was rated as Completely Degraded.

3 Tree Assessment

A total of 71 trees were recorded in the two areas. Tree data are provided in Attachment 1.

Trees likely to be native to the site included:

- Marri (*Corymbia calophylla*) – 26 trees
- Tuart (*Eucalyptus gomphocephala*) – 23 trees
- Sheoak (*Allocasuarina fraseriana*) – 7 trees
- Jarrah (*Eucalyptus marginata*) – 7 trees

Trees likely not to be native to the site included:

- WA Peppermint (*Agonis flexuosa*) – 1 tree
- Red Ironbark (*Eucalyptus sideroxylon*) – 1 tree
- Eucalyptus sp – 1 tree

In addition, there were 5 Standing Dead Trees recorded in the area.

Photographs of all trees are shown in Attachment 2.

The location of all trees assessed is shown in Attachment 3.

About a third of the trees (24 of 71) were rated as healthy trees. Twenty-five trees were rated as unhealthy or in poor condition. Five trees were dead, one of which had only recently died.

Examples of healthy Tuart trees are shown in Plates 1 and 2.

Plate 1: Healthy Tuart (Tree 60)

Plate 2: Healthy Tuart (Tree 51)

Many of the trees in the area currently used as an informal staff parking area were in poor health or were dead. Examples of unhealthy trees in this area are shown in Plates 3 and 4.

Plate 3: Unhealthy Marri and Sheoak

Plate 4: Unhealthy Marris

4 Black Cockatoo Habitat Trees

According to the EPBC Act Referral Guidelines for three species of Black Cockatoos, any Marri, Jarrah or Tuart tree with a DBH >50cm has the potential to be a breeding habitat tree for Black Cockatoos either currently, if there is a suitable hollow, or in the future if there is no hollow.

A total of 28 trees were recorded with a DBH of 50cm or greater. The species recorded were:

- Tuart – 16 trees
- Marri – 10 trees
- Jarrah – 2 trees

Most (25) of the trees did not have any hollows. Two trees had small hollows and one tree (Tree 24) contained a large vertical hollow that is highly likely to be hollow through to the base of the tree and therefore not be suitable for a breeding hollow for cockatoos (Plate 4).

All Marri, Jarrah, Tuart and Sheoak trees provide foraging habitat for Black Cockatoos. There are also some Standing Dead Trees (Plate 5).

Plate 4: Large Vertical Hollow on Tree 24.

Plate 5: Standing Dead Sheoak

5 Clearing Permit

A clearing permit is required under the State *Environmental Protection Act 1986* (EP Act) to clear native vegetation unless an exemption applies through Schedule 6 of the EP Act or the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004*. Clearing for the proposed works does not appear to qualify for an exemption.

The Stage 1 clearing has been undertaken under Clearing Permit CPS 10485-1 which was granted on 18 June 2024. The clearing permit is valid until 12 July 2029.

The proposed Stage 2 works will result in the clearing of four trees in total, including one Jarrah sapling (Tree 55), one dead *Allocasuarina fraseriana* (SDT), a small Tuart (Tree 58) and one significant tree, a Marri that is infested with termites (Tree 38), as shown in Figure 1. The total amount of additional clearing is 160m^2.

It may be possible to amend CPS 10485-1 to include the Stage 2 area given the location of clearing is in the same location and the amount of clearing is very small (approximately 160m^2).

6 EPBC Act Referral Guidelines

The Marri, Tuart, Jarrah and Sheoak trees on the site provide foraging habitat for Carnaby's Black Cockatoos and Forest Red-tailed Black Cockatoos while four Tuart trees provide potential breeding habitat. Evidence of Black Cockatoo foraging has previously been observed on a Marri tree on the site.

Carnaby's Black Cockatoos and Forest Red-tailed Black Cockatoos are listed as Matters of National Environmental Significance (MNES) under the Commonwealth *Environment Protection and Biodiversity Conservation Act 2000* (EPBC Act). A significant impact on MNES must be referred to the

Commonwealth environment department (DCCEEW) to determine whether the proposed impact needs to be fully assessed or not.

The referral guidelines for Black Cockatoos (Referral Guideline for 3 WA Threatened Black Cockatoo Species, 2022) provides guidance on whether the potential for a significant impact to occur. The statutory document to determine the level of impact is the *Significant Impact Guidelines 1.1.*

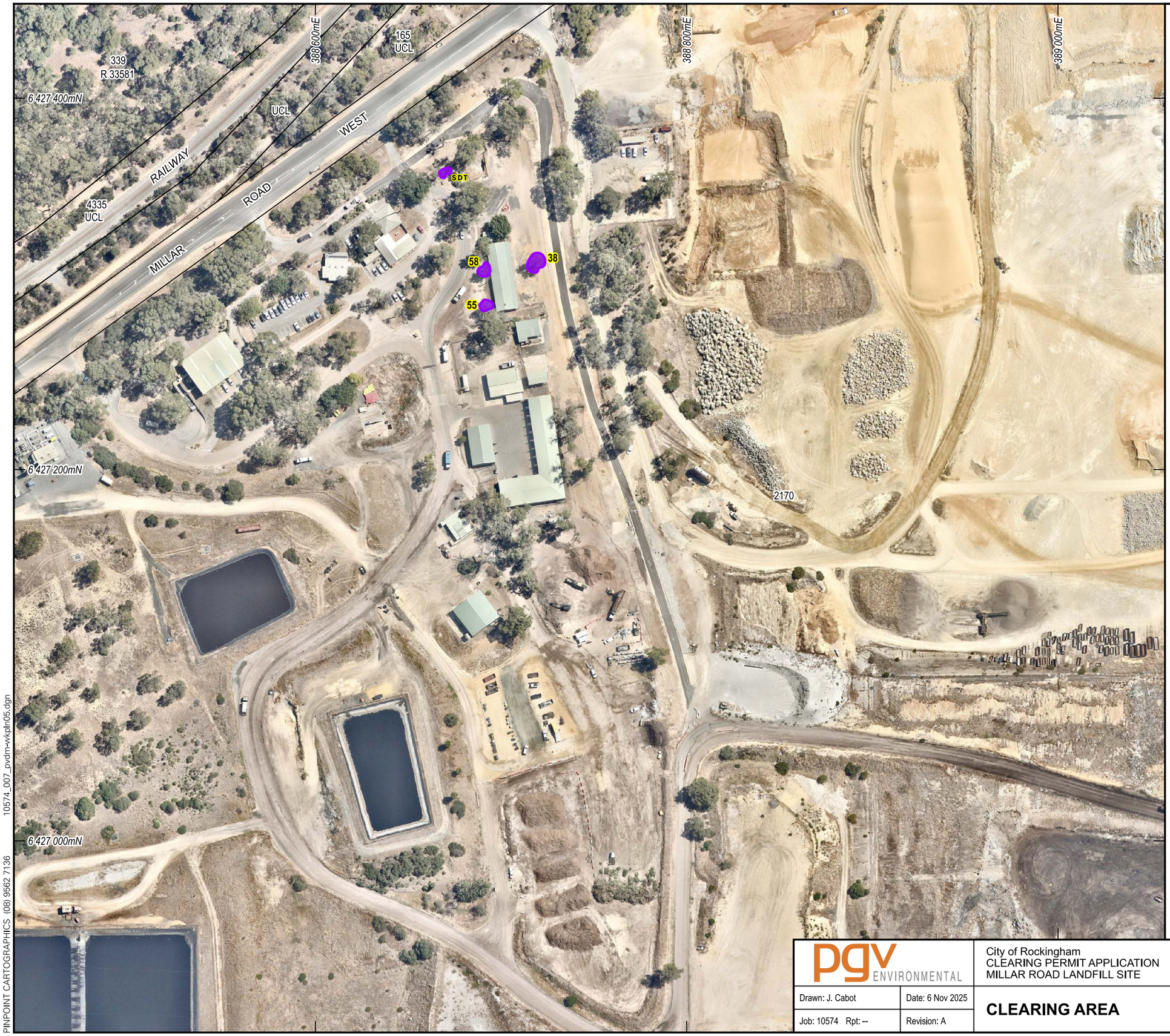
According to the Referral Guidelines the clearing of more than 1ha of quality foraging habitat could lead to a significant impact on Black Cockatoos and a Referral is recommended. The amount of foraging habitat proposed to be cleared (4 trees) is 160m^2 (0.016ha) which is well under the 1ha threshold.

Also, according to the Referral Guidelines the clearing of more than one breeding habitat tree could lead to a significant impact on Black Cockatoos and a Referral is recommended. There is one potential breeding habitat tree proposed to be cleared, however the tree is significantly impacted by termites. In accordance with the *Significant Impact Guidelines 1.1* the clearing of the one tree and a very small amount of foraging habitat is unlikely to lead to a significant impact and a referral should not be required.

7 Conclusion

The assessment of the vegetation in the Stage 2 area proposed for redevelopment on the Millar Road Landfill site in 2025 resulted in the following findings:

- No intact native vegetation occurs on the site;
- A total of 28 native trees occur in the area of which 4 are proposed to be cleared including a small Jarrah, a Sheoak and two small Tuarts;
- A large number of the trees were in unhealthy or poor condition;
- The native trees provide foraging habitat for Carnaby's and Forest Red-tailed Black Cockatoos. The total amount of clearing in Stage 2 is 0.016ha;
- Four Tuart trees were recorded which are defined as potential Black Cockatoo breeding habitat trees. None of the trees contain a hollow suitable for Black Cockatoo breeding and none are proposed to be cleared;
- A clearing permit will be required under the EP Act. The clearing of the four trees could be added to the current clearing permit CPS 10485-1 which was granted for the Stage 1 works and is valid until 2029;
- The clearing will be of one Jarrah sapling (Tree 55), one Standing Dead Tre that was *Allocasuarina fraseriana* (SDT), a small Tuart (Tree 58) and one significant tree, a Marri that is infested with termites (Tree 38); and
- The clearing is not likely to require referral under the Commonwealth EPBC Act.



N

0 20 40 60 80 100m

SCALE 1 : 2 000 at A3
GDA2020 MGA Zone 50

Legend

- Cadastral Boundary
- 46 Tree Number
- Clearing Area

CADASTRAL SOURCE: Landgate, August 2025.
AERIAL PHOTOGRAPH SOURCE: NearMap flown February 2025.

pgv ENVIRONMENTAL

City of Rockingham
CLEARING PERMIT APPLICATION
MILLAR ROAD LANDFILL SITE

Drawn: J. Cabot | Date: 6 Nov 2025
Job: 10574 Rpt: -- | Revision: A

CLEARING AREA

Workplan 5

10574_007_pvdm-wkpln05.dgn

PINPOINT CARTOGRAPHICS (08) 9562 7136

Tree #	Species	Easting	Northing	Height (m)	Diameter (cm)	2nd Branch (cm)	3rd Branch (cm)	Comments
1	Jarrah	388720	6427415	11	59			poor tree, no hollows
2	Jarrah	388710	6427409	11	41			healthy small tree, no hollows
3	Jarrah	388702	6427398	12	57			average tree, no hollows
4	Jarrah	388701	6427394	12	40			average tree, no hollows
5	Marri	388726	6427364	20	61			healthy tree, no hollows
6	Tuart	388735	6427349	25	73	70		healthy tree, no hollows
7	Tuart	388736	6427341	13	37			healthy tree, no hollows
8	Marri	388743	6427275	22	59			upright tree, some dead branches, no hollows
9	Marri	388749	6427259	19	61			healthy tree, no hollows
10	Marri	388762	6427228	18	37			one sided tree, poor condition, no hollows
11	Marri	388757	6427226	9	35			one sided tree, poor condition, no hollows
12	Marri	388751	6427226	12	43			poor tree, no hollows
13	Marri	388767	6427219	15	52			poor tree, no hollows
14	Marri	388766	6427219	12	42			poor tree, no hollows
15	Marri	388763	6427211	17	58			average tree, no hollows
16	Jarrah	388754	6427213	12	49			average tree, no hollows
17	Marri	388732	6427220	16	87			average tree, dead branches, no hollows
18	Marri	388730	6427225	17	53			chlorotic tree, poor condition, no hollows
19	Marri	388735	6427204	18	40			very poor, dead branches, no hollows
20	Marri	388741	6427199	16	35			very poor, dead branches, no hollows
21	Marri	388738	6427208	14	31			poor tree, no hollows
22	Tuart	388744	6427195	22	61	57		dead top, poor health, no hollows
23	Tuart	388735	6427167	21	103			average tree, dead branches, no hollows
24	Tuart	388714	6427163	25	138			large vertical hollow, probably no base. Old tree
25	Tuart	388710	6427171	18	40			healthy tree, no hollows
26	Tuart	388707	6427164	18	52			poor tree, dead top, no hollows
27	Tuart	388703	6427166	18	52	27		poor tree, leaning, no hollows
28	Tuart	388692	6427151	22	164			Very old tree, has been pruneed top branchs, small hollows, spout
29	Marri	388689	6427173	18	60			healthy tree, no hollows, foraging by Fores Red-tails
30	Tuart	388695	6427173	19	46			average tree, leaning, no hollows
31	Tuart	388705	6427114	20	74	61	30	average tree, no hollows
32	Tuart	388716	6427133	12	124			Dead main trunk, small hollows
33	Tuart	388782	6427095	19	99			average tree, no hollows
34	Tuart	388805	6427024	18	51			healthy tree, no hollows
35	Tuart	388807	6427023	15	45			healthy tree, no hollows
36	Marri	388807	6427005	15	38			average tree, no hollows
37	Tuart	388790	6426921	21	86			average tree, dead branches no hollows
38	Marri	388718	6427305	14	93			poor health, no hollows
39	Sheoak	388659	6427371	10	45			average tree, no hollows
40	Marri	388667	6427374	15	51			poor health, no hollows

Tree #	Species	Easting	Northing	Photo	Height (m)	Diameter (cm)
41	Sheoak	388672	6427323	12.29	7	62
42	Eucalyptus sideroxylon	388669	6427313	12.31	18	64
43	Eucalyptus sp.	388652	6427286	12.33L	10	17
44	Marri	388657	6427296	12.33R	10	36
45	Marri	388652	6427294	12.35L	6	22
46	Sheoak	388652	6427297	12.35R	6	33
47	Dead	388639	6427288	12.37L	20	67
48	Marri	388636	6427290	12.37R	19	48
49	Dead	388645	6427283	12.49	14	33
50	Marri	388674	6427269	12:50	5	18
51	Tuart	388694	6427273	12.51	24	77
52	Marri	388706	6427279	12.52	6	20
53	Marri	388707	6427281	12.53	15	45
54	Marri	388695	6427285	12.56	12	42
55	Jarrah	388690	6427289	12.57	4	23
56	Dead	388691	6427300	12.57L	7	34
57	Dead	388693	6427297	12.57R	6	24
58	Tuart	388692	6427306	12.59	9	26
59	Tuart	388692	6427315	1:00	17	46
60	Tuart	388679	6427339	1.01	26	75
61	Tuart	388681	6427351	1.04L	12	32
62	Sheoak	388684	6427350	1.04M	12	37
63	Sheoak	388685	6427347	1.04R	12	24
64	Marri	388679	6427363	1.08	9	25
65	Tuart	388680	6427369	1.08	22	75
66	Sheoak	388688	6427375	1:10	10	60
67	Tuart	388694	6427380	1.11	17	55
68	Peppermint	388700	6427385	1.12	7	25
69	Dead	388696	6427289	1.16	5	90
70	Sheoak	388663	6427196	1.19	10	65
71	Jarrah	388660	6427205		9	48

Black Cockatoo Habitat Trees

2nd Branch (cm)	3rd Branch (cm)	Comments
		healthy, leaning
		healthy
16	15	healthy
		unhealthy, no hollows
		unhealthy, no hollows
15		unhealthy
		Dead, no hollows
32	31	unhealthy, no hollows
		recently dead
		unhealthy, no hollows
		healthy, no hollows
15		unhealthy, no hollows
		unhealthy, no hollows
		healthy, leaning no hollows
		unhealthy, no hollows
		Dead, no hollows
		Dead, no hollows
		healthy, no hollows
		healthy, no hollows
73	67	healthy, nice tree
		healthy, no hollows
35		healthy, no hollows
		healthy, no hollows
		unhealthy, no hollows
		healthy, no hollows
		healthy
		unhealthy, no hollows
24	18+	healthy
		Dead - good wood for salvage
		healthy
		unhealthy

Tree 1

Tree 2 (right), 3 (middle) 4 (left)

Tree 4

Tree 5

Tree 6

Tree 7

Tree 8

Tree 9

Trees 10-16

Tree 17 (centre)

Tree 18

Tree 19 (Right), 20 (Left)

Tree 21

Tree 22

Tree 23

Tree 24

Tree 25

Tree 26 (Left), 27 (Right)

Tree 28

Tree 29

Tree 30

Tree 31

Tree 32

Tree 33

Tree 34 (Right), 35 (Left)

Tree 36

Tree 37

Tree 38

Tree 39

Tree 40

Tree 41

Tree 42

Tree 43 (Left) and 44 (Right)

Tree 45 (Left) and 46 (Right)

Tree 47 (Left) and 48 (Right)

Tree 49

Tree 50

Tree 51

Tree 52

Tree 53

Tree 54

Tree 55

Tree 56 (Left) and 57 (Right)

Tree 58

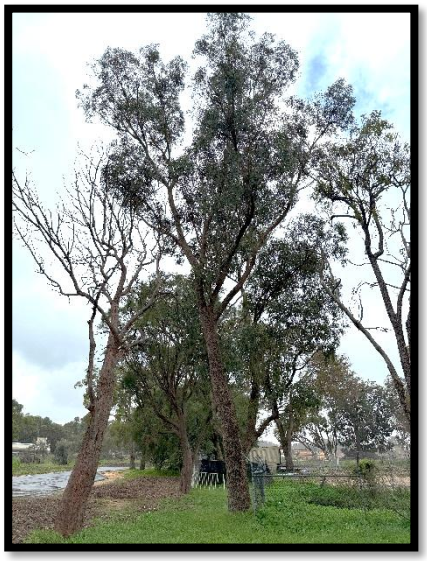
Tree 59

Tree 60

Tree 61 (Left), 62 (Middle) 63 (Right)

Tree 64

Tree 65



Tree 66

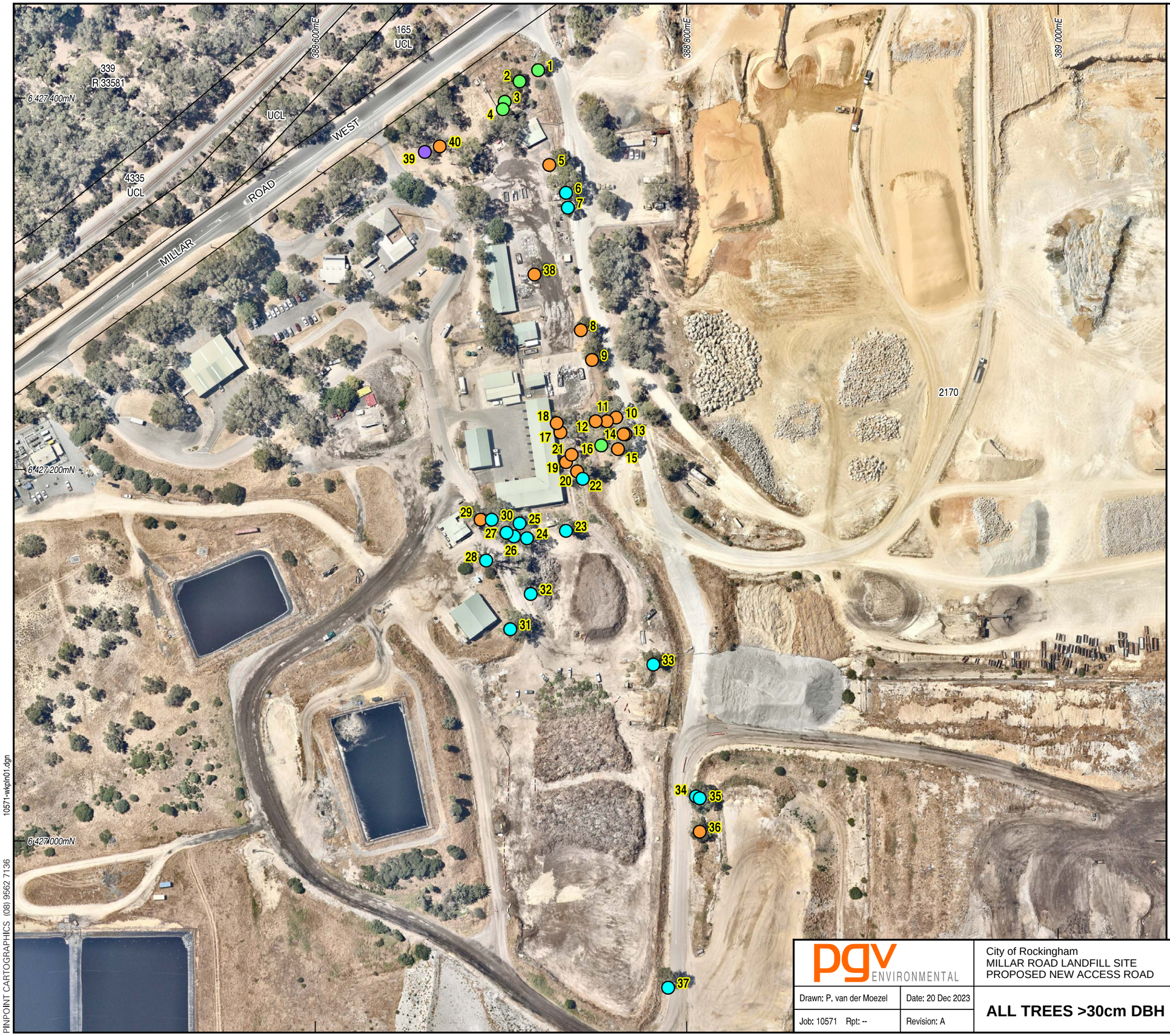
Tree 67

Tree 68

Tree 69

Tree 70

Tree 71 (no photo)



N

0 20 40 60 80 100m

SCALE 1 : 2 000 at A3 (MGA)

Legend

Cadastral Boundary

18 Tree Number

Significant Trees

- Jarrah
- Marri
- Tuart
- Sheoak

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City of Rockingham
MILLAR ROAD LANDFILL SITE
PROPOSED NEW ACCESS ROAD

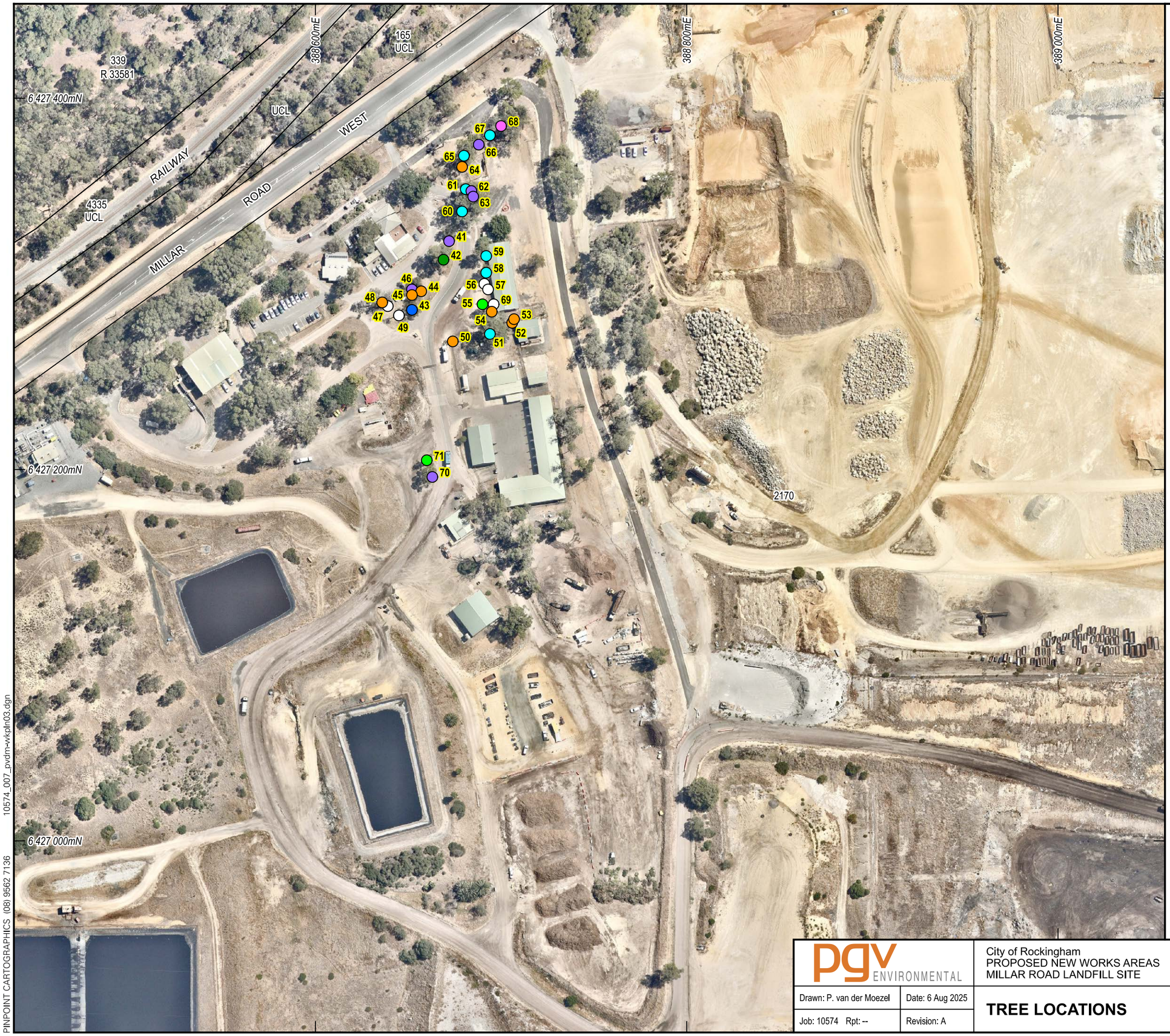
Drawn: P. van der Moezel | Date: 20 Dec 2023

Job: 10571 Rpt: -- | Revision: A

ALL TREES >30cm DBH

Workplan 1

PINPOINT CARTOGRAPHICS (08) 9562 7136 10571-wkpln01.dgn



N

0 20 40 60 80 100m

SCALE 1 : 2 000 at A3
GDA2020 MGA Zone 50

Legend

- Cadastral Boundary
- 46 Tree Number

Significant Trees

- Eucalyptus sideroxylon
- Eucalyptus sp.
- Jarrah
- Marri
- Peppermint
- Sheoak
- Tuart
- Dead

CADASTRAL SOURCE: Landgate, August 2025.
AERIAL PHOTOGRAPH SOURCE: NearMap flown February 2025.

pgv ENVIRONMENTAL

City of Rockingham
PROPOSED NEW WORKS AREAS
MILLAR ROAD LANDFILL SITE

Drawn: P. van der Moezel | Date: 6 Aug 2025
Job: 10574 Rpt: -- | Revision: A

TREE LOCATIONS

Workplan 3

10574_007_pvdm-wkpln03.dgn

PINPOINT CARTOGRAPHICS (08) 9562 7136

Please contact me if you would like to discuss any aspects of this assessment.

Yours sincerely

Paul van der Moezel
Managing Director

Figure 1: Proposed Clearing

Attachment 1: Tree Data
Attachment 2: Tree Photographs
Attachment 3: Tree Locations