GOVERNMENT OF
WESTERN AUSTRALIA

CLEARING PERMIT

Granted under section 51E of the Environmental Protection Act 1986

Purpose Permit number:	CPS 10589/1
Permit Holder:	Co-operative Bulk Handling Limited
Duration of Permit:	From 16 April 2025 to 16 April 2030

The permit holder is authorised to clear *native vegetation* subject to the following conditions of this permit.

PART I – CLEARING AUTHORISED

1. Clearing authorised (purpose)

The permit holder is authorised to clear *native vegetation* for the purpose of constructing railway siding and outloading infrastructure.

2. Land on which clearing is to be done

Lot 101 on Deposited Plan 65758, Perenjori

Railway reserve (PIN 1050583), Perenjori

Mullewa-Wubin road reserve (PIN 11663187), Perenjori

3. Clearing authorised

The permit holder must not clear more than 2.5 hectares of *native vegetation* within the areas cross-hatched yellow in Figure 1 of Schedule 1.

PART II – MANAGEMENT CONDITIONS

4. Avoid, minimise, and reduce impacts and extent of clearing

In determining the *native vegetation* authorised to be cleared under this permit, the permit holder must apply the following principles, set out in descending order of preference:

(a) avoid the *clearing* of *native vegetation*;

(b) minimise the amount of *native vegetation* to be cleared; and

(c) reduce the impact of *clearing* on any environmental value.

5. Weed management

When undertaking any clearing authorised under this permit, the permit holder must take the following measures to minimise the risk of introduction and spread of *weeds*:

(a) clean earth-moving machinery of soil and vegetation prior to entering and leaving the area to be cleared;

(b) ensure that no known *weed*-affected soil, *mulch, fill*, or other material is brought into the area to be cleared; and

(c) restrict the movement of machines and other vehicles to the limits of the areas to be cleared.

6. Fauna management – directional clearing

The permit holder must:

(a) conduct *clearing* authorised under this permit in one direction towards adjacent *native vegetation*; and

(b) allow reasonable time for fauna present within the area being cleared under this permit to move into adjacent *native vegetation* ahead of the *clearing* activity.

7. Flora management

Prior to undertaking any clearing authorised under this permit, the permit holder must:

(a) clearly demarcate the boundaries of the areas authorised to be cleared under this permit using a Global Positioning System (GPS) unit set to Geocentric Datum Australia 2020 (GDA2020), expressing the geographical coordinates in Eastings and Northings or decimal degrees; and

(b) demarcate *recorded priority flora*.

8. Offset – conservation covenant

Prior to 16 April 2026, for the area cross-hatched red in Figure 1 of Schedule 2, within Lot 8269 on Deposited Plan 148612, Perenjori, the permit holder must give a *conservation covenant*, in accordance with the following requirements:

(a) *native vegetation* in the area cross-hatched red in Figure 1 of Schedule 2 must not be cleared, other than for *clearing* required under the *Bush Fires Act 1954*;

(b) the area cross-hatched red in Figure 1 of Schedule 2 must not be used for the purpose of cultivation of crops or pasture, and must be kept free of livestock;

(c) the *conservation covenant* is to apply in perpetuity and be registered on the title of the property;

(d) the permit holder must, within 6 months of executing the *conservation covenant*, ensure an appropriate fence is erected along the area outlined red in Figure 2 of Schedule 2, which must be designed to prohibit access of livestock and prevent native fauna entanglement;

(e) the permit holder must undertake *weed* control within the area cross-hatched red in Figure 1 of Schedule 2, within 12 months of executing the *conservation covenant*, through direct spraying and / or hand pulling methods;

(f) post undertaking the *weed* control required under *condition* 8(e), the permit holder must:

(i) annually monitor the area cross-hatched red in Figure 1 of Schedule 2 for the presence of *Weeds of National Significance* and *declared pests*

(ii) maintain the area cross-hatched red in Figure 1 of Schedule 2 as free of *Weeds of National Significance* and *declared pests* for the life of this permit.

(g) within one month of executing the *conservation covenant*, the permit holder must provide evidence to the *CEO* that demonstrates the *conservation covenant* has been completed.

PART III - RECORD KEEPING AND REPORTING

9. Records that must be kept

The permit holder must maintain records relating to the listed relevant matters in accordance with the specifications detailed in Table 1.

Table 1: Records that must be kept

No.	Relevant matter	Specifications
1.	In relation to the authorised clearing activities generally	(a) the species composition, structure, and density of the cleared areas; (b) the location where the clearing occurred, recorded using a Global Positioning System (GPS) unit set to Geocentric Datum Australia 2020 (GDA2020), expressing the geographical coordinates in Eastings and Northings; (c) the date that the areas were cleared; (d) the size of the areas cleared (in hectares); (e) actions taken to avoid, minimise, and reduce the impacts and extent of clearing in accordance with *condition* 4; (f) actions taken to minimise the risk of the introduction and spread of *weeds* in accordance with *condition* 5; (g) fauna management actions taken in accordance with *condition* 6; and (h) flora management actions taken in accordance with *condition 7*.
2.	In relation to the offset area pursuant to *condition* 8	(a) evidence that the required area has been fenced in accordance with *condition* 8(d); (b) evidence of the *weed* control undertaken in accordance with *condition* 8(e), including the *weed* control methods used; (c) evidence of the annual monitoring, and *weed* maintenance activities undertaken in accordance with *condition* 8(f), including monitoring dates and the *weed* control methods used; and (d) evidence demonstrating the *conservation covenant* has been completed in accordance with *condition* 8(g).

10. Reporting

(a) The permit holder must provide to the *CEO* on or before 30 June of each year, a written report containing:

(i) the records required to be kept under *condition* 9; and

(ii) records of activities done by the permit holder under this permit between 1 January and 31 December of the preceding calendar year.

(b) If no *clearing* authorised under this permit has been undertaken, a written report confirming that no *clearing* under this permit has been undertaken must be provided to the *CEO* on or before 30 June of each calendar year.

(c) The permit holder must provide to the *CEO*, no later than 90 calendar days prior to the expiry date of the permit, a written report of records required under *condition* 9, where these records have not already been provided under *condition* 10(a).

DEFINITIONS

In this permit, the terms in Table 2 have the meanings defined.

Table 2: Definitions

Term	Definition
CEO	Chief Executive Officer of the department responsible for the administration of the clearing provisions under the *Environmental Protection Act 1986*.
clearing	has the meaning given under section 3(1) of the EP Act.
condition	a condition to which this clearing permit is subject under section 51H of the EP Act.
conservation covenant	means a conservation covenant under section 30B of the *Soil and Land Conservation Act 1945*.
declared pest	means any prohibited plant declared as a declared pest under section 22 of the *Biosecurity and Agriculture Management Act 2007*
department	means the department established under section 35 of the *Public Sector Management Act 1994* (WA) and designated as responsible for the administration of the EP Act, which includes Part V Division 3.
environmental specialist	means a person who holds a tertiary qualification in environmental science or equivalent and has a minimum of 2 years work experience relevant to the type of environmental advice that an environmental specialist is required to provide under this permit, or who is approved by the CEO as a suitable environmental specialist.
EP Act	*Environmental Protection Act 1986* (WA).
fill	means material used to increase the ground level, or to fill a depression.
mulch	means the use of organic matter, wood chips or rocks to slow the movement of water across the soil surface and to reduce evaporation.
native vegetation	has the meaning given under section 3(1) and section 51A of the EP Act.
priority flora	means those plant taxa described as priority flora classes 1, 2, 3, or 4 in the *Department of Biodiversity, Conservation and Attractions Threatened and Priority Flora List for Western Australia* (as amended).
recorded priority flora	means populations of *priority flora* species recorded outside of, but within 20 metres of, the area cross-hatched yellow in Figure 1 of Schedule

Term	Definition
	1, during the following surveys: • Bio Diverse Solutions (2022) *Reconnaissance Flora, Vegetation and Basic Fauna Survey Report*. CBH Perenjori Receival Site. Perenjori, WA 6620. Final. • AECOM Australia Pty Ltd (2023) *Perenjori – Flora and Vegetation Assessment*. Prepared for CBH Group Pty Ltd. • AECOM Australia Pty Ltd (2024) *Perenjori – Targeted Flora Survey*. Prepared for CBH Group Pty Ltd.
weeds	means any plant – (a) that is a *declared pest* under section 22 of the *Biosecurity and Agriculture Management Act 2007*; or (b) published in a Department of Biodiversity, Conservation and Attractions species-led ecological impact and invasiveness ranking summary, regardless of ranking; or (c) not indigenous to the area concerned.
weeds of national significance	means an invasive plant species listed as a Weed of National Significance under the Australian Weeds Strategy 2017 – 2027, or future revised publications of this strategy.

END OF CONDITIONS

Meenu Vitarana
Manager
NATIVE VEGETATION REGULATION

Officer delegated under Section 20
of the Environmental Protection Act 1986

24 March 2025

Schedule 1

The boundary of the area authorised to clear is shown in the map below (Figure 1).

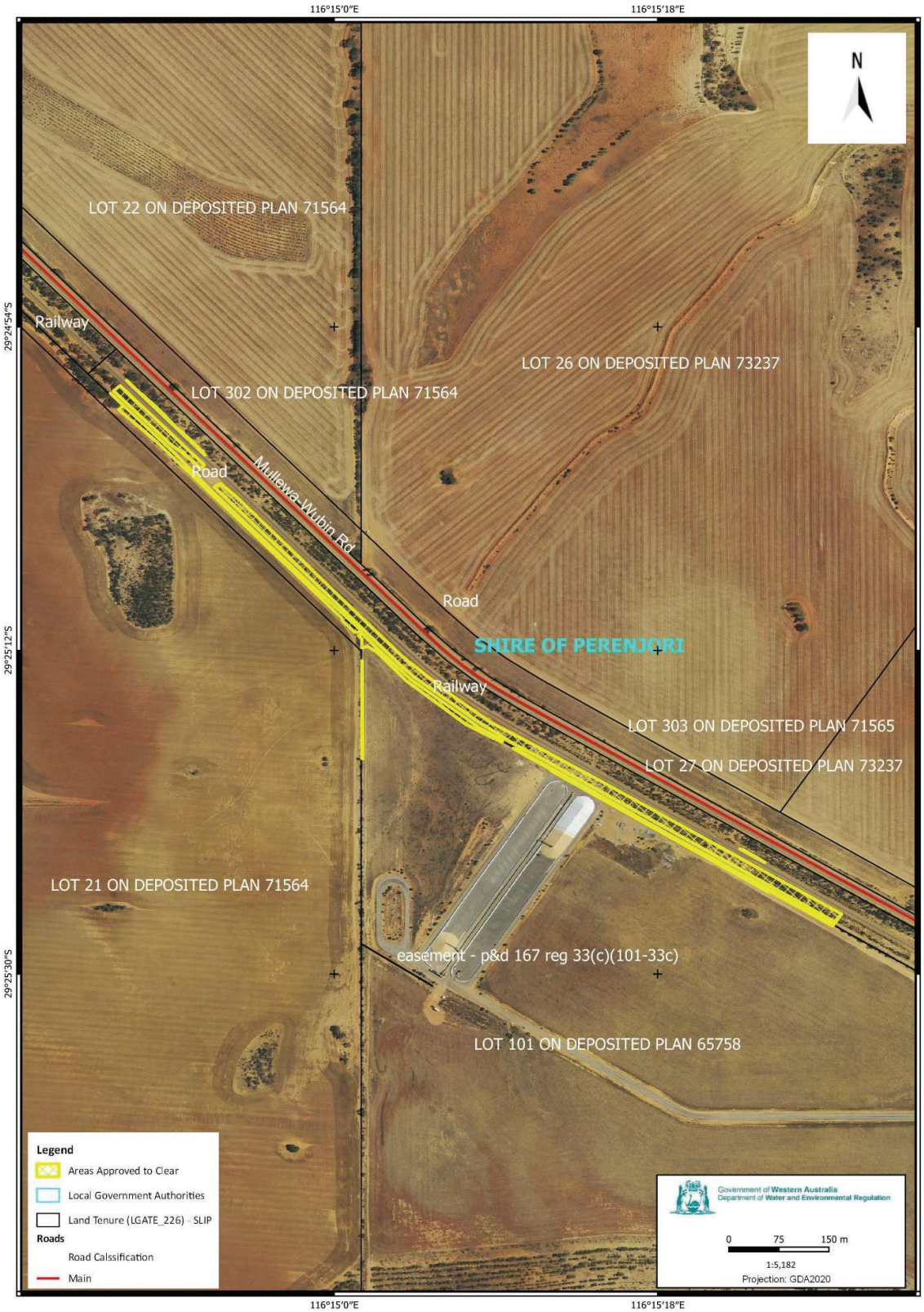

Figure 1. Map of the boundary of the area within which *clearing* may occur cross-hatched yellow.

Schedule 2

The boundary of the area where *condition* 8 (offset) applies is shown in Figure 1. The boundary of the area required to be fenced in accordance with condition 8(d) is shown in Figure 2.

Figure 1. Map of the boundary of the area required to be managed as an environmental offset**.**

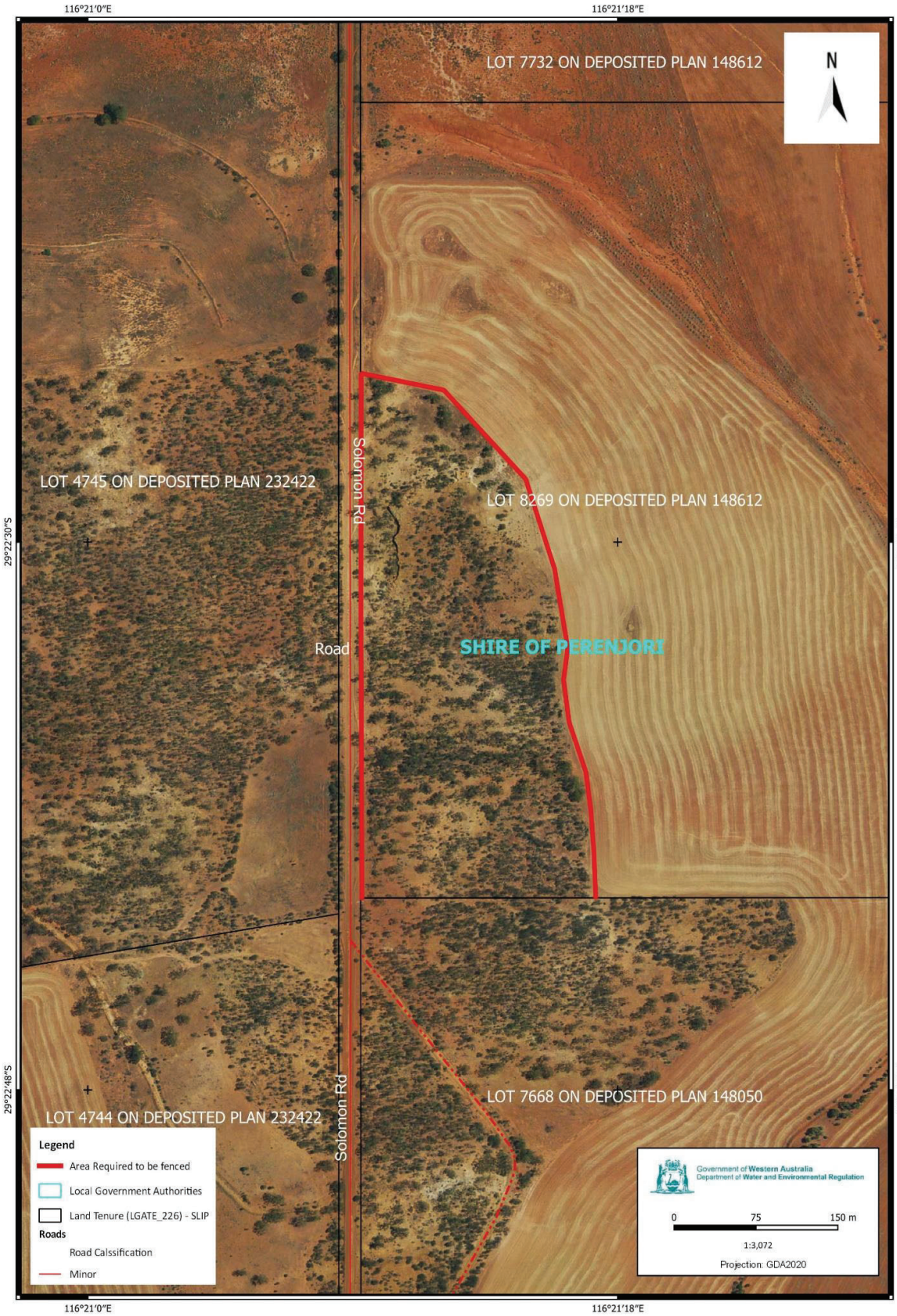

Figure 2. Map showing the area required to be fenced.

Government of Western Australia
Department of Water and Environmental Regulation

Clearing Permit Decision Report

1 Application details and outcome

1.1. Permit application details

Permit number:	CPS 10589/1
Permit type:	Purpose permit
Applicant name:	Co-operative Bulk Handling Limited (CBH)
Application received:	16 April 2024
Application area:	2.5 hectares of native vegetation
Purpose of clearing:	Construction of railway siding and outloading infrastructure
Method of clearing:	Mechanical
Property:	Lot 101 on Deposited Plan 65758 Railway reserve (PIN 1050583) Mullewa-Wubin road reserve (PIN 11663187)
Location (LGA area/s) and locality:	Perenjori

1.2. Description of application

The applicant proposes to clear 2.5 hectares of native vegetation, to expand and upgrade its existing Perenjori rail outloading infrastructure at the Perenjori North Receival Site. The upgrades propose the installation of new outloading infrastructure and approximately 1.3 kilometres of rail siding that will connect to the main railway line (Western Environmental, 2024).

The application area is adjacent to the outloading area proposed for upgrade, largely within the Avon Yard to Mullewa Rail reserve, within the Shire of Perenjori, in the Wheatbelt bioregion and Merredin subregion.

The applicant has advised that the proposed upgrades are in response to increasing market demand to produce and efficiently transport grain to port, and are necessary to (Western Environmental, 2024):

- address issues with current train loading (excessive splitting and shunting)
- improve outloading performance
- increase product storage
- alleviate safety concerns from trains blocking roads, including decreasing truck traffic near schools and within the Perenjori townsite.

The applicant notes that the Perenjori receival site is currently split between two sites, the Perenjori town site, and the Perenjori North Receival site (where most grain will be stored and received in the future). The existing siding and rail loading infrastructure is located at the Perenjori town site, therefore a significant quantity of grain needs to be transported by road from the Perenjori North Receival site to the town site for outloading. The applicant notes that this results in a high number of trucks on the road, and within the Perenjori townsite, which brings safety concerns. The proposed upgrades would significantly reduce the number of trucks moving through Perenjori (Western Environmental, 2024).

1.3. Decision on application

Decision:	Granted
Decision date:	24 March 2025
Decision area:	2.5 hectares of native vegetation, as depicted in Section 1.5, below.

1.4. Reasons for decision

This clearing permit application was submitted, accepted, assessed and determined in accordance with sections 51E and 51O of the *Environmental Protection Act 1986* (EP Act). The Department of Water and Environmental Regulation (DWER) advertised the application for 21 days and no submissions were received.

In making this decision, the Delegated Officer had regard for:

- the site characteristics (see Appendix A)
- relevant datasets (see Appendix D)
- the findings of biological surveys (AECOM Australia Pty Ltd (AECOM), 2023; AECOM, 2024; Bio Diverse Solutions (BDS), 2022; Bamford Consulting Ecologists (BCE), 2023)
- the clearing principles set out in Schedule 5 of the EP Act (see Appendix B)
- relevant planning instruments and any other matters considered relevant to the assessment (see Section 3)
- the purpose of the project, being to accommodate an increased market demand for grain and to address public safety risks arising from increased truck traffic within the Perenjori townsite
- that the Shire of Perenjori (Shire) has in-principle approved the development application for the project, and has provided its support for the project.

The assessment identified that the proposed clearing would result in the following environmental impacts:

- the loss of 2.5 hectares of significant remnant vegetation in an area that has been extensively cleared
- the loss of up to 6 individuals of Priority (P) 3 flora species *Apectospermum exsertum* and 47 individuals of Priority 3 flora species *Grevillea granulosa*
- the potential introduction and spread of weeds into adjacent native vegetation, which could impact on the quality of the adjacent vegetation and its habitat values
- a risk of injury to fauna through clearing operations.

After considering the available information, as well as the applicant's minimisation and mitigation measures (see Section 3.1), the Delegated Officer determined that impacts to priority flora, adjacent vegetation and fauna can be appropriately managed through conditions on the clearing permit.

The Delegated Officer determined that impacts to significant remnant vegetation in an area that has been extensively cleared remained significant even after the application of minimisation measures, and that this impact constitutes a significant residual impact.

The Delegated Officer considered the extent of environmental impact, the necessity for clearing, the applicant's adherence to the mitigation hierarchy, and Shire advice, and determined that it was appropriate to grant a clearing permit requiring management measures and an adequate environmental offset.

The applicant has provided an adequate environmental offset, consistent with the Government of Western Australia's *Environmental Offsets Policy* (2011) and *Environmental Offsets Guidelines* (2014), to counterbalance the abovementioned significant residual impact. The offset involves ensuring the conservation in perpetuity, and maintenance of (through weed control and fencing), 5.52 hectares of significant remnant vegetation in an extensively cleared landscape (in largely very good condition). The offset site, as shown in Figures 4 and 5, occurs around 10 kilometres from the application area within the Shire of Perenjori (see Section 4 for a detailed description of the offset).

The Delegated Officer therefore decided to grant a clearing permit subject to conditions requiring the applicant to:

- implement an environmental offset, as outlined above
- undertake avoid and minimise measures to reduce the impacts and extent of clearing
- undertake hygiene steps to minimise the risk of the introduction and spread of weeds
- undertake slow, progressive one-directional clearing to allow terrestrial fauna to move into adjacent habitat ahead of the clearing activity
- demarcate all priority flora recorded outside of, but within 20 metres of, the application area, to prevent inadvertent impact to these species.

1.5. Site maps

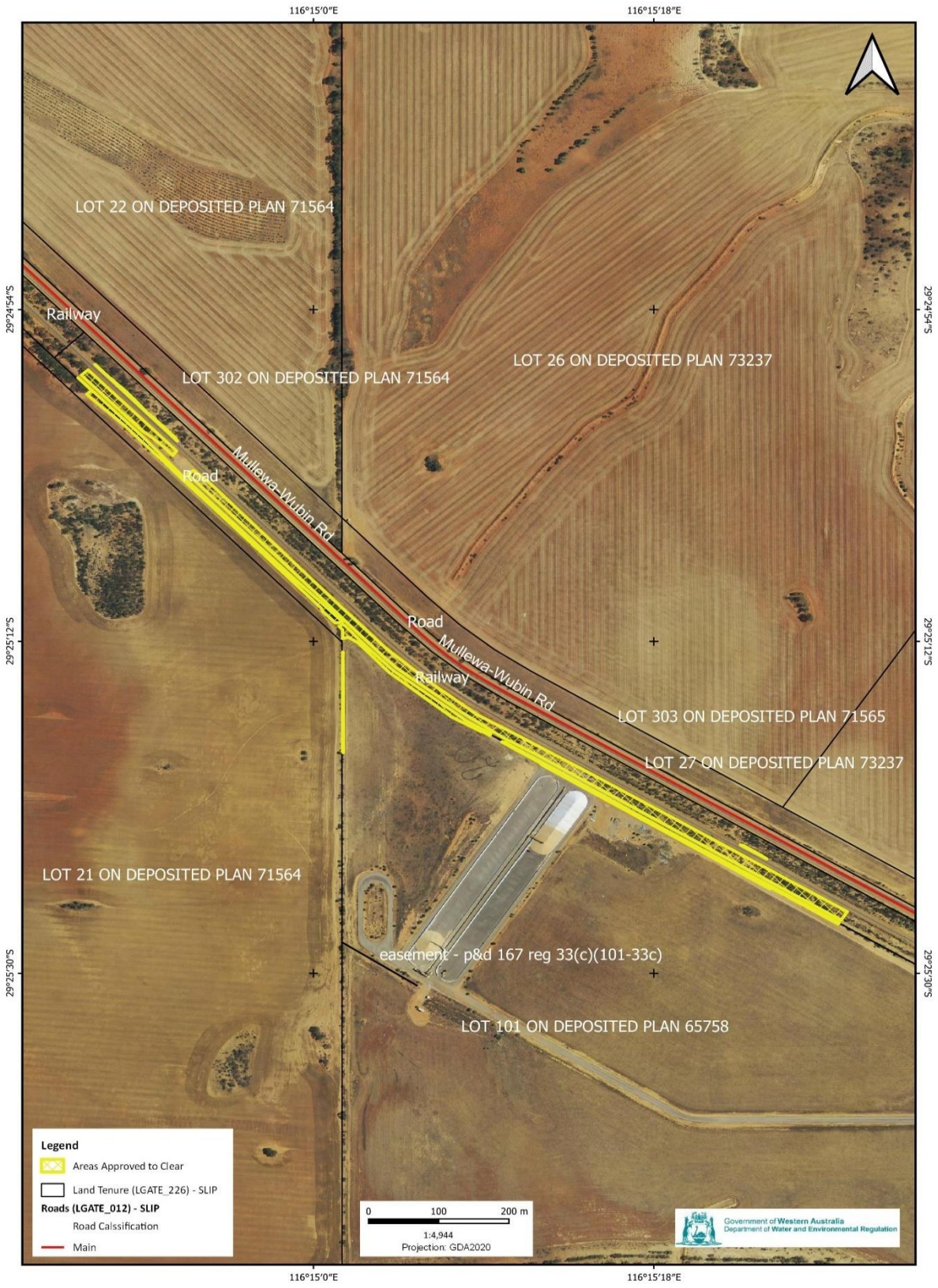

Figure 1 - Map of the application area

The area cross-hatched yellow indicates the area authorised to clear under the granted clearing permit.

2 Legislative context

The clearing of native vegetation in Western Australia is regulated under the EP Act and the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* (Clearing Regulations).

In addition to the matters considered in accordance with section 51O of the EP Act (see Section 1.4), the Delegated Officer has also had regard to the objects and principles under section 4A of the EP Act, particularly:

- the precautionary principle
- the principle of intergenerational equity
- the principle of the conservation of biological diversity and ecological integrity.

Other legislation of relevance for this assessment include:

- *Biodiversity Conservation Act 2016* (WA) (BC Act)
- *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act)

Relevant policies considered during the assessment include:

- *Environmental Offsets Policy* (2011)

The key guidance documents which inform this assessment are:

- *A guide to the assessment of applications to clear native vegetation* (DER, December 2013)
- *Environmental Offsets Guidelines* (August 2014)
- Technical guidance – *Flora and Vegetation Surveys for Environmental Impact Assessment* (EPA, 2016)
- Technical guidance – *Terrestrial Fauna Surveys for Environmental Impact Assessment* (EPA, 2020).

3 Detailed assessment of application

3.1. Avoidance, minimisation and mitigation measures

The applicant has demonstrated its consideration of alternative project options to avoid and minimise the extent of impact to environmental values, including the potential for the upgrades to occur at the Perenjori townsite receival area (Western Environmental, 2024).

The applicant notes the application area was selected as the preferred option as it avoided the need to clear native vegetation for the expansion of the grain storage facility. The current site was also preferred on the basis that it was less likely to contain occurrences of the Eucalypt Woodlands of the Western Australian Wheatbelt threatened ecological community and potential black cockatoo nesting and roosting sites (Western Environmental, 2024).

The applicant advised the project location and final design was informed by spring flora, vegetation and fauna surveys (AECOM, 2023; Bamford Consulting Ecologists (BCE)) undertaken over a much larger footprint area. This allowed the applicant to target the least environmentally significant areas as the project site. The applicants demonstrated avoid and minimise measures include (Western Environmental, 2024):

- siting most of the proposed infrastructure on the southern side of the rail to:
    - largely include native vegetation in a degraded (Keighery, 1994) condition (~76 per cent of the application area)
    - avoid contiguous patches of vegetation in a good or better condition that extend over one hectare on the north side of the rail and provide higher fauna linkage values (see Figure 2 below).
    - avoid 60 locations (319 individuals) of 5 priority flora taxa on the north side of the rail (see Figure 3)
- reducing the original planned siding length from 58 wagons to 54 wagons, to avoid 23 locations of recorded priority flora and reduce the extent of impact to vegetation in a very good (Keighery, 1994) condition
- reducing the siding length north-west to reduce the clearing of higher quality Carnaby's cockatoo foraging habitat
- siting all laydowns in existing cleared CBH land
- designing construction access to occur within existing cleared paddocks to the south which utilises existing cleared areas between vegetation to access rail corridor tracks.

The Delegated Officer was satisfied that the applicant has made a reasonable effort to avoid and minimise potential impacts on environmental values. After considering the applicant's avoidance and minimisation measures, the Delegated Officer determined that an offset to counterbalance the impact to significant remnant vegetation growing in an extensively cleared area was necessary. In accordance with the Government of Western Australia's

Environmental Offsets Policy and *Environmental Offsets Guidelines*, this significant residual impact has been addressed through the conditioning of environmental offset requirements on the clearing permit. The nature and suitability of the offset is provided in Section 4.

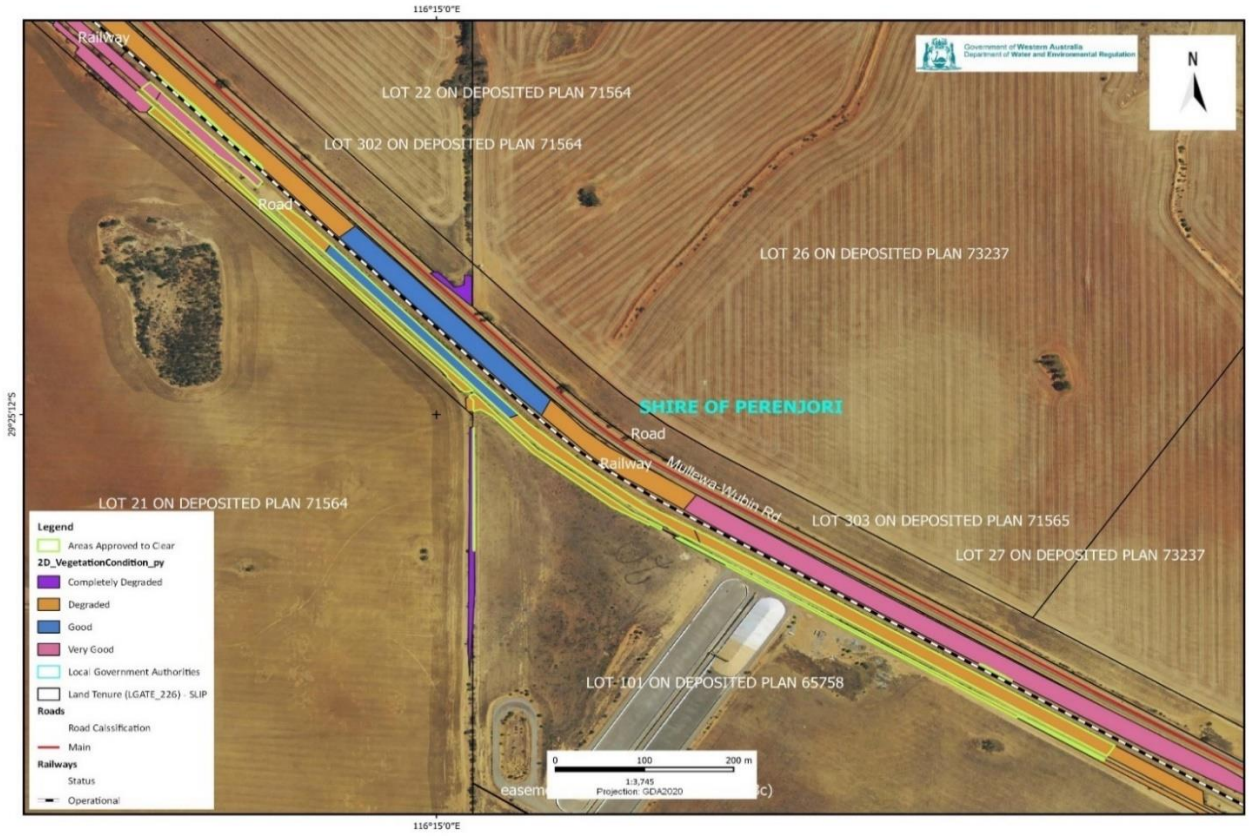

Figure 2 – Vegetation condition of the survey area, showing avoidance of vegetation in a very good condition on the eastern side of the railway.

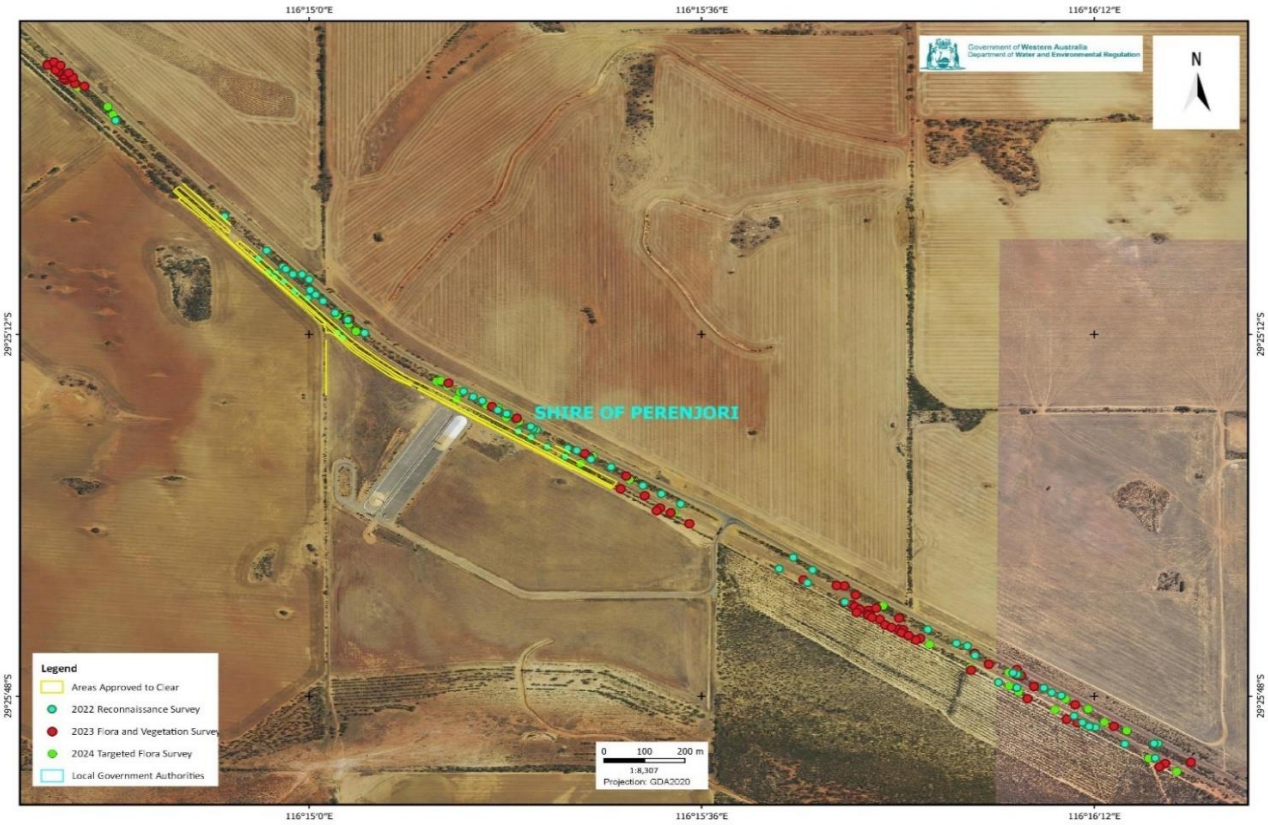

Figure 3 – Priority flora locations within the survey area, showing avoidance of numerous priority flora locations north and south.

3.2. Assessment of impacts on environmental values

In assessing the application, the Delegated Officer had regard for the site characteristics (see Appendix B), biological survey findings, and the extent to which the impacts of the proposed clearing present a risk to biological, conservation, or land and water resource values.

The assessment against the clearing principles (see Appendix B) identified that the impacts of the proposed clearing present a risk to conservation listed fauna, flora and ecological communities, significant remnant vegetation and land resources through degradation. The consideration of these impacts, and the extent to which they can be managed or counterbalanced through conditions applied in line with sections 51H and 51I of the EP Act, is set out below.

3.2.1. Significant remnant vegetation in an extensively cleared landscape – Principle (e)

Assessment

The national objectives and targets for biodiversity conservation in Australia (national objectives) has a target to prevent clearance of ecological communities with an extent below 30 per cent of that present pre-1750, below which species loss appears to accelerate exponentially at an ecosystem level (Commonwealth of Australia, 2001).

The application area is within the Avon Wheatbelt Interim Biogeographic Regionalisation for Australia (IBRA) Bioregion (Wheatbelt Bioregion). The Avon Bioregion has been subject to extensive historical clearing for agriculture and retains 18.51 per cent of its pre-European vegetation extent.

The vegetation within the application area is mapped as the under-represented Beard Vegetation Association (BVA) 352 'Perenjori' which retains 17.27 per cent of its pre-European vegetation (Government of Western Australia, 2018). A very small portion (0.03 hectares) of the application area is considered representative of this BVA.

The native vegetation within the local area (20-kilometre radius surrounding the application area) has been extensively cleared and retains 14.22 per cent of its original extent.

Noting the above native vegetation extents, the clearing of native vegetation within the application area is inconsistent with the national objectives.

The vegetation within the application area comprises *Melaleuca* and *Grevillea* shrubland in a very good to degraded (Keighery, 1994) condition (~76 per cent degraded) (AECOM, 2023). This vegetation includes priority 3 flora species *Apectospermum exsertum* and *Grevillea granulosa*, and provides general habitat for fauna within an extensively cleared landscape (see Sections 3.2.2 and 3.2.3 for the assessment against these specific values). The vegetation is also likely to contribute to the ecological function of the local area given the limited extent of native vegetation remaining in this portion of the Wheatbelt Bioregion. Therefore, the vegetation within the application areas is a significant remnant.

The vegetation within the application area also contributes to northwest - southeast fauna linkage values that exist within the Avon Yard to Mullewa Rail reserve. The proposed clearing will not sever the vegetation within this rail reserve noting that it is almost entirely limited to vegetation on the south side of the rail. The Delegated Officer considered the applicants efforts to avoid vegetation in a better condition on the north side of the rail, which will continue to provide linkage habitat post clearing. The proposed clearing is therefore unlikely to significantly impact on fauna movement through the landscape.

The proposed clearing will increase the risk of weed spread into adjacent vegetation, noting the high degree of weed cover within a large portion of the application area. Weed management measures would assist to minimise this risk.

Noting the above, the proposed clearing will result in the loss of significant native vegetation within an area that has been extensively cleared. This impact is considered a significant residual impact that requires counterbalancing by an appropriate environmental offset. In making this determination, the Delegated Officer also considered the cumulative impacts contributing to the loss of native vegetation resulting from surrounding projects within the local area approved and proposed under Part V and Part IV of the EP Act.

Conclusion

Based on the above assessment, the proposed clearing will result in the loss of 2.5 hectares of native vegetation that is significant native vegetation within an extensively cleared landscape. This impact constitutes a significant residual impact that requires counterbalancing by an environmental offset, as conditioned on the clearing permit (detailed under Section 4). The Delegated Officer considered the extent of impact and the applicant's adherence to the mitigation hierarchy in determining that an offset was suitable to counterbalance the above impact.

The proposed clearing may also increase the risk of weed spread into adjacent native vegetation, which will require management, as outlined below.

Conditions

To address the above impacts, the following actions will be required as conditions on the clearing permit:

- An environmental offset (see Section 4)
- Weed hygiene measures, to ensure protocols are put in place to limit the introduction and spread of weed affected material.

3.2.2. Biological values – Flora and ecological communities – Principle (a)

Assessment

Background

The applicant had commissioned three flora surveys over a larger area (around 125 hectares) encompassing the application area for this project. The applicant notes that these surveys included larger survey areas to allow for design changes to avoid areas with higher environmental values. These surveys included:

- Reconnaissance Flora, Vegetation and Basic Fauna Survey Report (undertaken out of season; winter 2022) (Bio Diverse Solutions, 2022) (herein referred to as the reconnaissance flora survey)
- Perenjori - Flora and Vegetation Assessment (detailed and targeted spring season flora survey) (AECOM, 2023) (herein referred to as the flora and vegetation survey)
- Perenjori - Targeted Flora Survey (targeted spring season flora survey) (AECOM, 2024) (herein referred to as the targeted flora survey).

The Delegated Officer considered the consistency of these surveys with the EPA Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment (EPA, 2016). The Delegated Officer determined that the combined surveys were appropriate to identify the presence of conservation listed flora and threatened and priority ecological communities known from the local area, within the broader survey footprint.

The flora and vegetation assessment identified that the application area comprises the following vegetation types (for full descriptions see Appendix A) (AECOM, 2023), which ranged in condition from very good to completely degraded (76 per cent in a degraded condition):

- Melaleuca Tall Open Shrubland – 1.22 hectares
- Grevillea Tall Open Shrubland – 1.23 hectares
- Eucalyptus Mid Open Woodland– 0.03 hectares
- Planted and Cleared – 0.02 hectares.

The flora and vegetation survey identified 97 native flora species within the survey area. No flora species representing significant range extensions were recorded (AECOM, 2023).

Eucalypt Woodlands of the Western Australian Wheatbelt

The Eucalypt Woodlands of the Western Australian Wheatbelt (Wheatbelt Woodlands) is a critically endangered threatened ecological community (TEC) under the Commonwealth EPBC Act and is state listed as a priority 3 ecological community by the Department of Biodiversity Conservation and Attractions (DBCA).

The application area is mapped as the Wheatbelt Woodlands TEC. This extrapolated mapping is considered indicative, and ground truthing is required to confirm an occurrence of this community (Department of the Environment, 2015). To determine the TEC presence, ground truthing should be compared to the key diagnostic characteristics, and patch size and vegetation condition thresholds that are set out in the Approved Conservation Advice for this TEC (Department of the Environment, 2015).

The flora and vegetation assessment compared the vegetation within the survey area against the key diagnostic characteristics and patch size and condition thresholds for the Wheatbelt Woodlands TEC. The vegetation identified as most representative of the Wheatbelt Woodlands TEC was the 'Eucalyptus woodland' (full description in Appendix A), which occurred over two separate patches (patch 1 and patch 2), comprising 0.73 hectares of the broader survey area. Of this, 0.03 hectares occurs within the application area, being a small portion of patch 1. Patch 2 was recorded well outside the southeastern boundary of the application area (more than 500 metres).

The flora and vegetation survey determined that the two patches of this vegetation type within the broader survey area did not meet the key diagnostic characteristics, and / or patch size and vegetation condition thresholds of the Wheatbelt Woodlands TEC (AECOM, 2023). With respect to patch 1, the survey considered that (AECOM, 2023):

- the patch was too small to meet the patch size threshold of the TEC, as it comprised 0.48 hectares of non-roadside vegetation (AECOM, 2023), which does not meet the 2-hectare minimum patch size requirement (Department of the Environment, 2015)
- the dominant overstorey species of this vegetation type is *Eucalyptus loxophleba* subsp. *supralaevis* which is recognised as an associated canopy species of the TEC, but not a key species (Department of the Environment, 2015).

DWER assessed these survey findings with consideration of the Approved Conservation Advice and the Delegated Officer agreed that the vegetation within the application area is not likely to be representative of the Wheatbelt Woodland TEC. Noting this, and that the application area is not nearby any areas considered representative of this TEC, the proposed clearing is not likely to impact on this TEC.

Priority Flora

A likelihood of occurrence analysis undertaken for the flora and vegetation survey (confirmed by DWER desktop assessment) identified 31 conservation listed flora species that may occur within the broader survey area. This is based on known records within the local area (or just beyond) and habitat suitability within the survey area (AECOM, 2023). Of these species, 5 priority flora were recorded within the survey area (BDS, 2022; AECOM, 2023; AECOM, 2024):

- *Apectospermum exsertum* (Priority (P) 3) (formerly known as *Leptospermum exsertum* (Priority 1) and recorded as such during the flora surveys of the application area)
- *Baeckea* sp. Perenjori (J.W. Green 1516) (P2)
- *Enekbatus longistylus* (P3)
- *Grevillea asparagoides* (P3)
- *Grevillea granulosa* (P3)

Apectospermum exsertum

One individual of this species was recorded one kilometre from the application area during the 2022 reconnaissance flora survey, however this species was not identified as a priority species at initial collection and its numbered occurrence and location was not recorded (BDS, 2022).

The subsequent 2023 flora and vegetation survey identified this species as "common" within the understorey and identified 161 individuals within the broader survey area (AECOM, 2023). None of the recorded individuals occurred within the application area, with recorded locations on the opposite side of the railway, or southeast of the application area. The closest occurrence was 20 metres from the southeastern portion of the application area.

The follow up 2024 targeted flora survey identified 97 individuals within the survey area, despite individuals being sterile at the time of survey and difficult to identify (AECOM, 2024). Two of the 97 individuals recorded during the 2024 survey were located within the application area, from two locations, with numerous individuals recorded on the opposite side of the rail reserve, and southeast. Four individuals from an additional location were recorded within 5 metres of the application area, and would remain largely isolated post clearing.

Noting the above, 6 of the 97 individuals (from three locations) of this species recorded during the 2024 survey may be directly impacted by the proposed clearing. In quantifying this impact, the assessment has precautionarily considered that those individuals recorded within five metres of the application area will be directly impacted by the proposed clearing. This impact represents the loss of 6.18 per cent of individuals recorded within the larger survey area.

Noting that the individuals were sterile at the time of the 2024 survey, there is the potential that further individuals could occur within the larger survey area and potentially the application area. However, based on the 2023 and 2024 survey findings, any differences in the proportion of individuals occurring within the application area relative to the survey area are expected to be minimal.

This species is known from 15 records statewide, and its occurrence within the survey area does not represent a range extension.

Based on the above assessment, the proposed clearing is not likely to impact on the local or regional extent of this species, or impact on its conservation status. This is noting the extent of this species in the surrounding survey area, small proportional direct impact relative to the number of individuals recorded in the survey area, and that the locations of this species within the application area do not represent a range extension.

Baeckea sp. Perenjori (J.W. Green 1516)

This species was not identified during the 2022 reconnaissance survey noting the survey timing was not appropriate to identify this species (BDS, 2022).

This species was identified during the 2023 flora and vegetation survey on the opposite (eastern) side of the railway to the application area (30 metres away). This species was not recognised as a priority species at the time and was a sterile collection, therefore it was not counted. The flora and vegetation survey noted that it was likely that 2 to 5 individuals occurred, given a foliage cover of one per cent (AECOM, 2023).

Noting that the 2023 flora and vegetation survey identified a sterile specimen and did not quantify the number of individuals present, the applicant commissioned a further targeted flora survey of the application area.

The 2024 targeted flora survey did not identify this species, despite several suspected collections recorded (AECOM, 2024). The survey noted that this species is difficult to identify without flowers, and many species were sterile during the survey due to lower-than-expected winter rainfall (AECOM, 2024). This is despite the survey being appropriately timed and of adequate effort. The survey concluded that despite the difficulties in identifying this species, it is unlikely to occur in large numbers within the broader survey area (AECOM, 2024).

This species is known from 20 records statewide and its occurrence within the survey area does not represent a range extension.

Based on the above assessment, the proposed clearing is not likely to impact on the local or regional extent of this species, or impact on its conservation status. This is noting the flora surveys did not identify this species in the application area (with consideration of the difficulties in identifying the species), the presence of higher quality habitat within the broader survey area (on the opposite side of the rail), and that its occurrence within the broader survey area does not represent a range extension.

The Delegated Officer considered that, despite this species being largely sterile during the 2023 and 2024 flora surveys, the requirement for an additional survey targeting this species is not warranted. This is noting the departments above assessment and consideration of multiple flora surveys undertaken over the application area to date, which indicates that there is a low risk of a significant impact to this species.

Enekbatus longistylus

This species was not identified during the 2022 reconnaissance survey noting the survey timing was not appropriate to identify this species (BDS, 2022).

This species was identified during the 2023 flora and vegetation survey on the opposite (eastern) side of the railway to the application area (37 metres away). This species was not recognised as a priority species at the time and was a sterile collection, therefore it was not counted (AECOM, 2023).

Noting that the 2023 flora and vegetation survey identified a sterile specimen and did not quantify the number of individuals present, despite the survey timing and methodology being appropriate, the applicant commissioned a further targeted flora survey of the application area.

The targeted survey was able to better establish the population of this species and identified 22 individuals within the survey area, all on the opposite (eastern) side of the railway to the application area. The closest of these was recorded

24 metres away. The survey identified that the occurrence of this species is likely under-represented given it is difficult to confidently identify (AECOM, 2024).

This species is known from 17 records statewide and its occurrence within the survey area does not represent a range extension.

Noting that this species was not recorded within the application area, and appears to be more prevalent within the opposite side of the rail reserve, the proposed clearing is considered unlikely to impact on the local or regional extent of this species, or impact on its conservation status.

Grevillea asparagoides

The 2022 reconnaissance flora survey identified an estimated 15 locations of this species within the survey area and noted that further targeted searches would assist to quantify the population extent. All locations were recorded on the opposite side of the railway to the application area, with the closest location eight metres from the application area (BDS, 2022).

The 2023 flora and vegetation survey also identified this species. This survey identified 30 records, representing 67 individuals, to the north and east of the application area, with the closest record 78 metres from the application area. The survey recorded the species as locally common where it was identified (AECOM, 2023).

Noting that this species was not recorded within the application area, and extent of this species recorded beyond the application area within the broader survey footprint, the proposed clearing is not likely to impact on the local or regional extent of this species, or impact on its conservation status.

Grevillea granulosa

The 2022 reconnaissance flora survey recorded 60 locations of this species within the survey area (referred to as "abundant" within the survey report). Exact individual and location counts were not undertaken as the survey was not targeted. However, the estimated counts attributed within the survey spatial data records indicate that around 267 individuals occur. Of the 60 locations, six occur within the application area, with an estimated count of 28 individuals (BDS, 2022). A further 7 locations comprising an estimated 19 individuals were recorded adjacent to the application area and would remain vulnerable to edge effects post clearing, as the proposed clearing would remove much of the habitat surrounding these locations.

The 2023 flora and vegetation survey identified seven individuals of this species on the eastern side of the railway and southeast of the application area, with the closest record 27 metres from the application area (AECOM, 2023). The flora and vegetation survey noted that the recorded specimens of this species were sterile at the time of survey which made confident identification difficult (AECOM, 2023). This was despite the survey being undertaken following two months of above average rainfall (AECOM, 2023).

Given the findings of the reconnaissance flora survey, the proposed clearing may impact on an estimated 46 individuals of this species. This impact has considered the risk to those six locations recorded adjacent to the application area (within three metres) noting they may not persist long term as they would remain largely isolated. The proportionate impact to this species is therefore 7 out of an estimated 60 locations, and 47 out of an estimated 267 individuals (17.6 per cent).

This species is known from 50 records statewide and its recorded occurrence within the survey area does not represent a range extension.

Based on the above assessment, the proposed clearing is not likely to impact on the local or regional extent of this species, or impact on its conservation status. This is determination is based on the small proportional impact to the recorded locations and individuals (estimate) within the broader survey area, and that the locations of this species within the application area do not represent a range extension.

The Delegated Officer considered that, despite this species being sterile during the 2023 flora and vegetation survey, the requirement for an additional survey targeting this species is not warranted. This is noting the reconnaissance flora survey findings, which indicate there is a low risk that the proposed clearing will significantly impact on this species.

Conclusion

The proposed clearing is likely to result in the loss of:

- Up to an estimated 46 individuals of *Grevillea granulosa* (P3), representing the loss of 17.2 per cent of individuals recorded within the larger survey area
- Up to 6 individuals of *Apectospermum exsertum* representing the loss of 6.18 per cent of individuals recorded within the larger survey area.

The assessment has determined that the proposed clearing is not likely to significantly impact on the local or regional extent of the above species, or their conservation status.

The proposed clearing may result in indirect impacts to priority flora recorded outside of, but nearby the application area. Appropriate management measures will be required as a condition of the clearing permit (as detailed below) to address this potential impact.

Conditions

To manage the impacts to priority flora, the following actions will be required as conditions on the clearing permit:

- undertake avoid and minimise actions to reduce the impacts and extent of clearing
- undertake specific hygiene measures to minimise the risk of the introduction and spread of weeds into surrounding native vegetation
- demarcate the application area prior to clearing along with all priority flora recorded outside of, but within 20 metres of, the application area, to prevent inadvertent impacts to priority flora.

An offset is not required to counterbalance the impact to priority flora. However, the offset proposed to counterbalance the impact to significant remnant vegetation in an extensively cleared landscape will have the effect of conserving and maintaining remnant vegetation within the Shire of Perenjori,, which provides a high level of biodiversity given it includes priority flora species *Baeckea* sp. Perenjori (J.W. Green 1516) (P2) and *Stenanthemum poicilum* (P3) (CBH Group, 2024) (see Section 4 for details on the offset proposed).

3.2.3. Biological values – Fauna (Principle (b)

Assessment

Background

The applicant commissioned 2 fauna surveys over a larger area encompassing the application area:

- Reconnaissance Flora, Vegetation and Basic Fauna Survey Report (undertaken out of season; winter 2022) (BDS, 2022); and
- Perenjori Fauna Assessment (including a targeted black cockatoo habitat assessment) (BCE, 2023).

The following fauna habitats were recorded within the application area during the above surveys:

- BDS (2022) -
  - Mixed native shrubland (2.475 hectares)
  - York gum woodland (0.025 hectares)
- BCE (2023) -
  - Cleared paddock (2.450 hectares)
  - Complex shrubland (0.053 hectares)

The surveys considered that eight conservation listed fauna species may use the application area based on the known distribution and habitat preferences of these species. This consideration was confirmed by DWERs desktop assessment. These species are:

- Carnaby's cockatoo (*Zanda latirostris*) (Endangered; BC Act and EPBC Act)
- western spiny-tailed skink (*Egernia stokesii badia*) (Vulnerable; EP Act and Endangered; EPBC Act)
- peregrine falcon (*Falco peregrinus*) (Other specially protected fauna; BC Act)
- shield-backed trapdoor spider (*Idiosoma nigrum*) (Endangered; BC Act and Vulnerable; EPBC Act)
- malleefowl (*Leipoa ocellata*) (Vulnerable; BC Act and EPBC Act)
- fork-tailed swift (*Apus pacificus*) (Migratory; BC Act and EPBC Act)

- letter winged kite (*Elanus scriptus*) (Priority 4; DBCA)
- grey wagtail (*Motacilla cinerea*) (Migratory; BC Act and EPBC Act)

The grey wagtail, letter-winged kite, fork-tailed swift and peregrine falcon are all highly mobile avian fauna with large home ranges. Noting this, and that suitable breeding habitat for these species does not occur within the application area (absence of large trees or trees with hollows), the proposed clearing is not likely to impact on significant habitat for these species. These species have therefore not been considered further below.

Carnaby's cockatoo

The application area is just within (by around 4 kilometres) the eastern boundary of the Carnaby's cockatoo's mapped distribution. The closest Carnaby's cockatoo record to the application area is 19 kilometres west, the closest known breeding site is 24 kilometres west and the closest known roost site is 69 kilometres west.

The application area includes suitable foraging habitat for Carnaby's cockatoo, largely in the form of *Grevillea* tall open shrubland (1.23 hectares of the application area).

The importance of foraging habitat for black cockatoos increases when it occurs within foraging distance of nesting sites (around 12 km) as it supports breeding effort (EPA 2019). Food resources within the range of roost sites are also important to sustain populations of black cockatoos (EPA 2019).

The fauna surveys did not identify any foraging or roosting evidence within the broader survey area (BDS, 2022; BCE, 2023). Further, the surveys did not identify any evidence of current or potential nesting trees within the application area (trees with a diameter at breast height of greater than 500 millimetres (DCCEEW, 2023)), or evidence of nesting within any larger trees recorded within the broader survey area (BCE, 2022; BCE, 2023).

The BCE survey noted that Carnaby's cockatoo is likely to occur only as a vagrant in this area of Perenjori due to extensive habitat loss in this far eastern portion of the species mapped distribution (BCE, 2023).

Given the above, the proposed clearing is not likely to impact on significant foraging habitat for Carnaby's cockatoo. This is noting the:

- distance to the closest -
  - individual record
  - breeding and roosting record
- lack of any evidence of Carnaby's cockatoo using the survey area during the fauna surveys
- extent of suitable foraging habitat proposed for impact, with consideration of the above factors.

Malleefowl

There are 26 records of this species within the local area, with the most recent record from 2013. The majority of malleefowl records within the local area and just beyond are confined to nature reserves.

The fauna surveys did not identify any evidence of malleefowl within the broader survey area (mounds or otherwise) (BDS, 2022; BCE, 2023). The BCE survey notes that while individuals may disperse through the survey area infrequently, this species is not expected to be resident due to the small area of suitable habitat present and high levels of predation within the local area (BCE, 2023).

Wheatbelt Malleefowl typically occur within shrublands dominated by *Acacia* and woodlands dominated by mallee *Eucalyptus* (DCCEEW, 2024). The small 0.03-hectare portion of *Eucalyptus* woodland within the application area provides suitable habitat for this species (coincides with the 'York gum woodland' and 'Complex shrubland' fauna habitat types).

Based on the above assessment, the proposed clearing is not likely to impact on significant habitat for this species. This is noting the small extent of clearing proposed of the suitable vegetation type, lack of any malleefowl evidence within the broader survey area, lack of nearby nature reserves that could support breeding for this species, and absence of recent malleefowl records within the local area.

Western spiny-tailed skink

There are 22 records of this species within the local area, the most recent recorded in 2008, around 3.1 kilometres south of the application area. Most records of this species occur within York gum woodland containing piles of hollow

logs, with some records also known from Gimlet (*E. salubris*) and Salmon Gum (*E. salmonophloia*) woodland (Department of Environment and Conservation (DEC), 2012).

The BDS survey noted the presence of marginal habitat for this species within the 0.025 hectares of York gum woodland habitat that occurs within the application area (BDS, 2022). The BCE survey considered this species may be an irregular visitor within the survey area, given an absence of large trees and hollow logs (BCE, 2023). Neither survey identified evidence of this species within the survey areas (BCE, 2023; BDS, 2022).

Noting the small extent of this species suitable habitat proposed for clearing, and absence of preferred habitat features within this habitat type, the proposed clearing is not likely to impact on significant habitat for this species.

Shield-backed trapdoor spider

The BDS survey identified marginal habitat for this species (BDS, 2022). This species was excluded from consideration within the BCE survey as it was considered 'out of range' (BCE, 2023). The BCE survey exclusion was likely because the closest known record of this species to the application area is 47 kilometres southeast.

In the wheatbelt this species typically inhabits clay soils within open York gum (*Eucalyptus loxophleba*), Salmon gum (*E. salmonophloia*) and Wheatbelt wandoo (*E. capillosa*) woodland, where *Acacia* (particularly *Acacia acuminata*) vegetation forms a sparse understorey. There must be enough leaf litter and twigs to build burrows, without being too dense (Commonwealth of Australia, 2013). A very small portion (0.03 hectares) of the application area comprising *Eucalyptus* woodland provides potential habitat for this species, although no *Acacia* was recorded within this vegetation type.

The BDS survey identified one spider burrow around 600 metres from the application area within the *Eucalyptus* woodland vegetation type. The survey could not identify what species was using the burrow (BDS, 2022).

Noting the minimal extent of suitable habitat within the application area for this species, and that burrows were not identified within the application area, the proposed clearing is not likely to impact on this species.

Other impacts

The proposed clearing has the potential to increase the risk of injury to any fauna using the application area at the time of clearing, via machinery strike. Fauna management measures that require slow, one directional, progressive clearing would assist in minimising this risk.

The proposed clearing may also increase the risk of weeds spreading into adjacent area of higher quality fauna habitat. Weed hygiene management measures would assist in minimising this risk.

The impact to ecological linkages has been assessed above under Section 3.2.1.

Conclusion

Based on the above assessment, the proposed clearing is not likely to impact on significant habitat for fauna. It may however:

- increase the risk of fauna strike to any fauna using the application area at the time of clearing
- increase the risk of weeds spreading into adjacent areas of higher quality fauna habitat.

Conditions

To address the above impacts, the following management measures will be required as conditions on the clearing permit:

- avoid, minimise and reduce the impacts and extent of clearing
- take hygiene steps to minimise the risk of the introduction and spread of weeds
- undertake slow, progressive one directional clearing to allow terrestrial fauna to move into adjacent habitat ahead of the clearing activity.

While an offset is not required to counterbalance the impact to fauna habitat, it is noted that the offset proposed to counterbalance the impact to significant remnant vegetation within an extensively cleared landscape will have the effect of conserving and maintaining remnant vegetation within the Shire of Perenjori, which provides fauna habitat values (see Section 4 for details on the offset proposed).

3.2.4. Land degradation – Principle (g)

The land degradation risk mapping for the Granada 1 subsystem soils indicate that this soil type is susceptible to wind erosion, with 30 to 50 per cent of this map unit at a high to very high risk of wind erosion.

The proposed clearing is linear and will not impact on the higher quality native vegetation on the opposite side of the railway (around 15 metres away). This vegetation comprises a belt of around 15 metres width which will remain on the opposite side of the rail, for the entire length of the application area, and beyond. Noting this, and that the proposed clearing is to install and upgrade rail siding infrastructure (meaning soils will not be left bare post clearing), the proposed clearing is not likely to result in appreciable land degradation through wind erosion.

The largely sandy soils mapped over the application area (Granada 1 Subsystem) are highly permeable and not considered to be at high risk of land degradation from water erosion or waterlogging. These soils are also not mapped as being at high risk of land degradation through salinity or nutrient export, despite evidence of salinity on other soil types nearby within the Perenjori locality.

However, the application area is in an extensively cleared Wheatbelt landscape where salinity is a regional issue. While salinity has been recorded from the surrounding area on different mapped soil types, salinity risk mapping indicates the Granada 1 subsystem is not at high or moderate risk of salinity. The surface expression of salinity was not observed within the application area (BDS, 2022; AECOM, 2023; Western Environmental, 2024).

Noting the above, the proposed removal of 2.5 hectares of native vegetation largely comprising *Melaleuca* and *Grevillea* open shrubland (rather than the Eucalypt woodland with larger deeper-rooted trees), across a linear area adjacent to the railway, is not likely to lead to appreciable land degradation through increasing the surface expression of salinity.

The Disturbance Footprint is mapped as having an extremely low probability of Acid Sulfate Soils (ASS) occurring, therefore the ASS risk from clearing is considered minimal.

Conclusion

Based on the above assessment, the proposed clearing is not likely to result in appreciable land degradation, given the mapped soil type, salinity risk, and extent and linearity of proposed clearing.

Conditions

No conditions are required to manage the low risk of appreciable land degradation.

3.3. Relevant planning instruments and other matters

The applicant has applied for development approval from the Shire of Perenjori for the proposed clearing. The Shire has advised the agenda item for the development approval has been approved by council, and the Shire is very supportive of the project (Shire of Perenjori, 2025).

The application area does not intersect any registered Aboriginal Heritage Sites. The closest Aboriginal Heritage Site is Mongers Lake Waterway located around 3.1 kilometres from the application area.

The applicant commissioned a cultural heritage site identification survey of a broader area encompassing the application area in 2022, under the CBH Yamatji Proponent Standard Heritage Agreement with the Yamatji Southern Regional Corporation. The applicant notes that Traditional Owners from the Yamatji Nation Indigenous Land Use Agreement participated in all aspects of the fieldwork for this survey (Western Environmental, 2024). The survey did not identify any new sites of significance or artefacts (Western Environmental, 2024).

It is the permit holder's responsibility to comply with the *Aboriginal Heritage Act 1972* (WA) and ensure that no Aboriginal Sites of Significance are damaged through the clearing process.

4 Suitability of offsets

Significant residual impact

Through the detailed assessment outlined in Section 3.2 above, the Delegated Officer has determined that the following significant residual impact remains after the application of the avoidance and minimisation measures summarised in Section 3.1:

- the loss of 2.5 hectares of significant native vegetation within a highly cleared landscape, including vegetation mapped as the extensively cleared Beard Vegetation Association 352.

The applicant has proposed an environmental offset to counterbalance the above impact, as detailed below. The Delegated Officer determined in this instance it was appropriate to consider an offset to counterbalance the significant residual impact given the extent of proposed impact, and the applicants efforts to avoid and minimise the environmental impacts of the proposed clearing, in accordance with the Environmental Offsets Guidelines (2014).

Proposed offset

The applicant is proposing to conserve (in perpetuity) and maintain 5.52 hectares of native vegetation in a very good to good (Keighery, 1994) condition (majority in a very good condition), within Lot 8269 on Deposited Plan 148612, Perenjori (the offset site).

The offset site is on freehold laned zoned 'rural' under the local town planning scheme. The offset site is 10 kilometres northeast of the application area. The offset area is located within the Avon Wheatbelt bioregion and Merredin subregion, as per the application area. The offset site is bordered by agricultural paddocks to the north and east, native vegetation to the south and an unsealed road to the west (see Figures 4 and 5).

The offset site is privately owned. The applicant has finalised a formal agreement with the property owner which provides a commitment to conserve the offset site in perpetuity via a conservation covenant under section 30B of the *Soil and Land Conservation Act 1945*.

The total area of native vegetation proposed to be placed under a conservation covenant is 8.64 hectares, of which 5.52 hectares will be allocated as an offset to address the significant residual impacts associated with this clearing permit application. The Delegated Officer understands that the remaining area of the vegetation placed under the conservation covenant may be used as a banked offset for potential future proposals.

In addition to ensuring the conservation in perpetuity of the offset site, the applicant has committed to maintain the offset site to ensure it does not degrade over time, through undertaking the following actions (CBH, 2024):

- establish fencing around the western, northern and eastern periphery of the offset site to exclude vehicles (except for management vehicles), people and grazers
- undertaking strict hygiene measures to prevent the spread of weeds into the offset site
- weed control within the first 12 months of the conservation covenant being executed over the offset area, via direct spraying and / or hand pulling
- ongoing weed management as required, to be informed by annual monitoring (visual inspection).

Offset site values

A biological survey of the offset site was undertaken to identify its environmental values. The offset site contains native vegetation that is a significant remnant in a highly cleared landscape. Specifically, the offset site contains (CBH, 2024):

- vegetation in a good to very good (Keighery, 1994) condition comprising –
  - York Gum (*Eucalyptus loxophleba*) open low woodland and low woodland on stony hill slopes
  - *Acacia* / *Melaleuca* thicket or scrub on stony plains and minor floodplains
  - *Melaleuca* / *Allocasuarina* / *Acacia* open scrub on lateritic outcrops, breakaways and stony hill slopes
  - York Gum low woodland with *Acacia* thicket or scrub on drainage lines and adjacent minor flood plains.
- vegetation mapped as the extensively cleared BVA 352, consistent with that mapped over the application area
- occurrences of priority flora species *Baeckea* sp. Perenjori (P2) and *Stenanthemum poicilum* (Priority 3)
- vegetation that provides value as a stepping stone for fauna in an extensively cleared landscape.

Further information on the offset site values is available within the applicants document titled 'Perenjori Offset Proposal (CPS 10589/1)' here - Index of /permit/10589.

Offset adequacy

The Delegated Officer considered that the proposed offset would have the effect of conserving high value native vegetation currently zoned for a rural end land use, that is at risk of deteriorating over time without appropriate management (as proposed), given the surrounding threatening agricultural land use.

In assessing whether the proposed offset is proportionate to the significance of the environmental values being impacted, DWER has undertaken a calculation using the WA Environmental Offsets Calculator. The justification for the values used in the offset calculations are provided online here - Index of /permit/10589.

In accordance with the WA Environmental Offsets Calculator, Environmental Offsets Metric, *WA Environmental Offsets Policy* (2011) and *Environmental Offsets Guidelines* (2014), the Delegated Officer considers that the proposed offset is adequate to counterbalance the significant residual impacts of the proposed clearing.

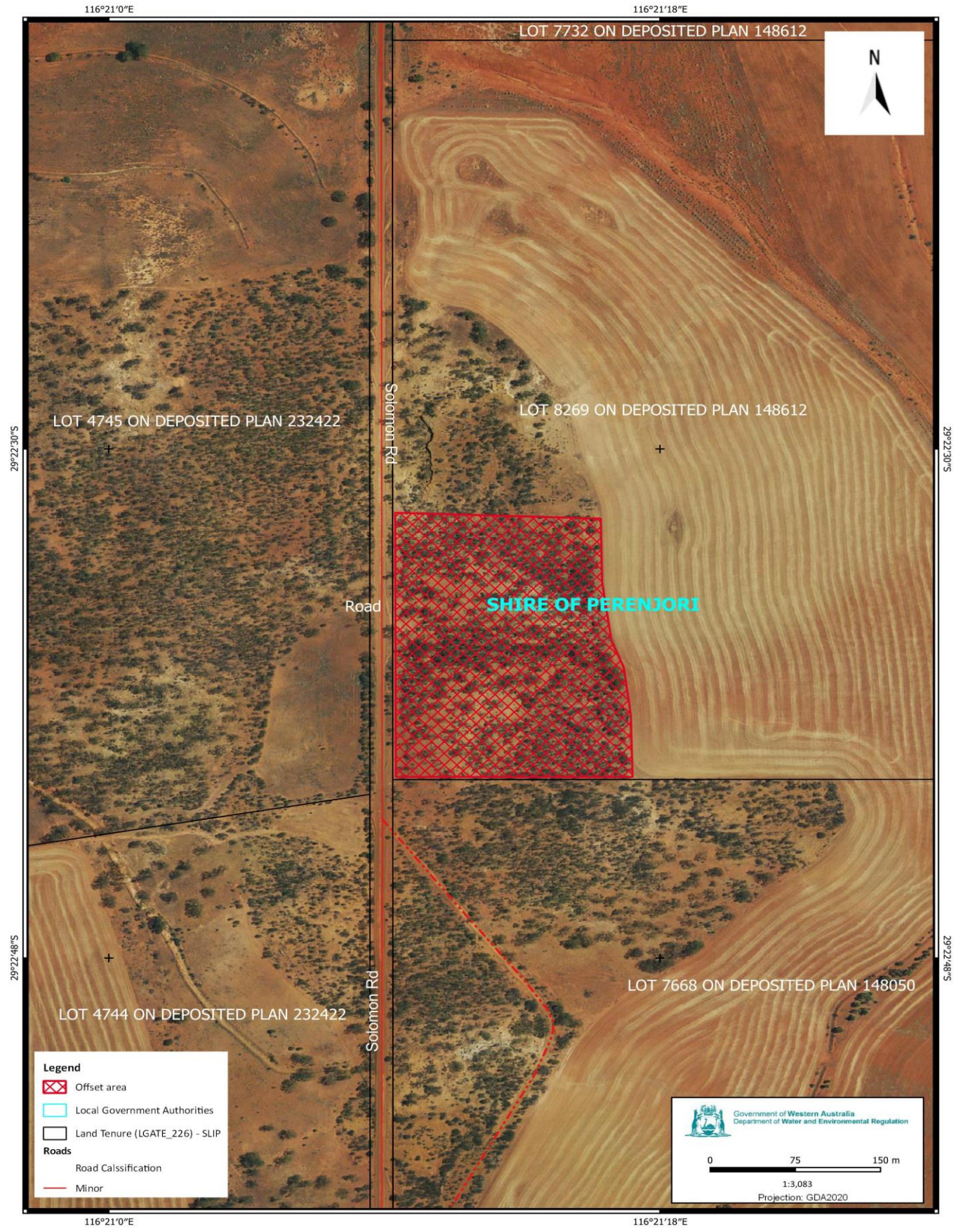

Figure 4 – Map of the proposed offset area

The area cross-hatched red indicates the area required for an offset under the granted clearing permit.

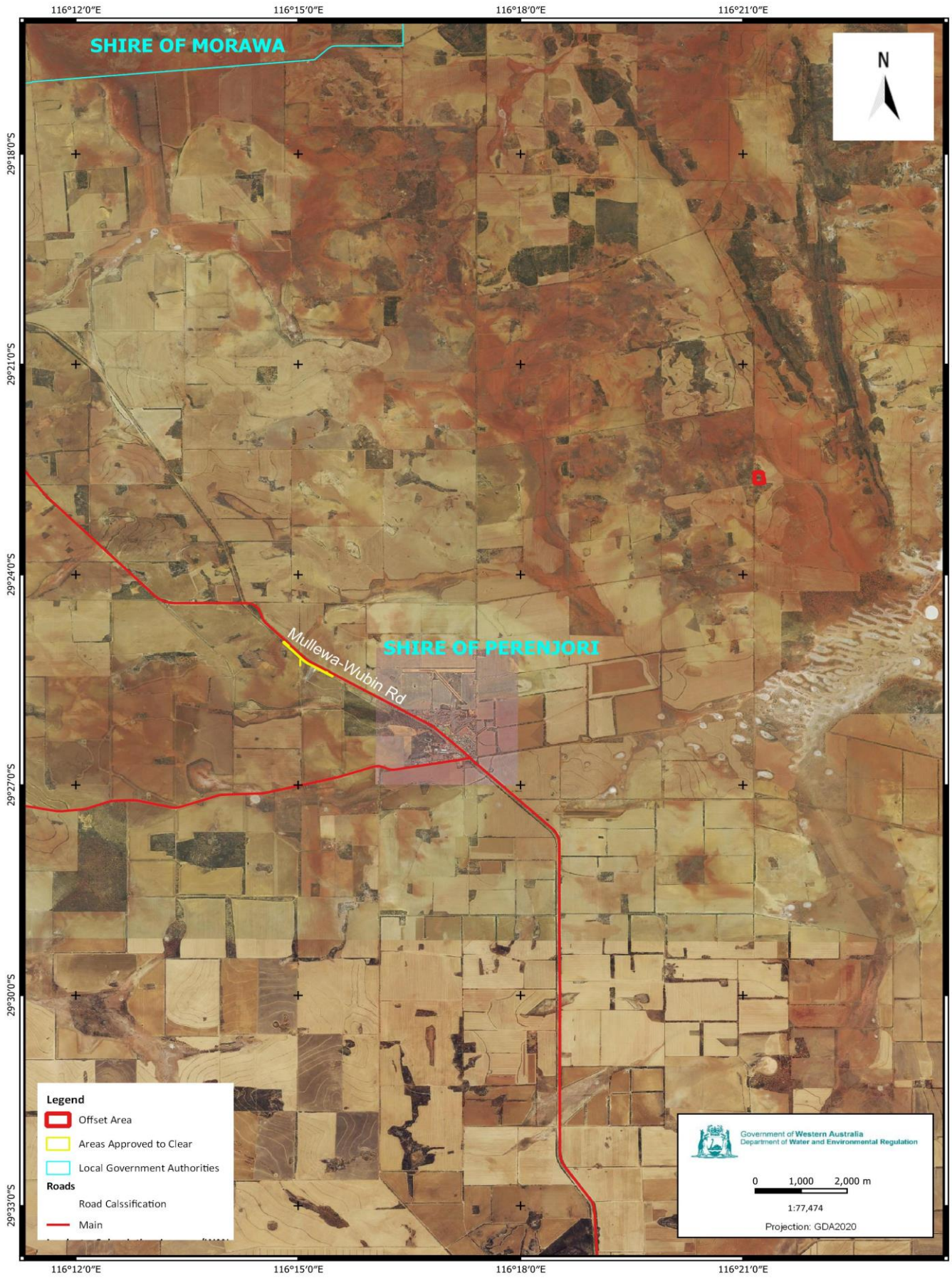

Figure 5 – Context map of the proposed offset area and approved clearing area

The area highlighted yellow indicates the approved clearing area, the area highlighted red indicates the offset area.

Appendix A. Site characteristics

A.1 Site characteristics

Characteristic	Details
Local context	The application area is within the northeastern portion of the Avon Wheatbelt Bioregion and within the Merredin Subregion, which has been subject to extensive historical clearing for agriculture. The local area (20-kilometre radius) surrounding the application area retains around 14.21 per cent native vegetation cover.
Ecological linkage	The vegetation within the application area does not form part of any formally mapped ecological linkages, however it provides north-west to south-east fauna linkage values through an extensively cleared landscape.
Conservation areas	The closest conservation area to the application area is West Perenjori Nature Reserve, located 5.2 kilometres southwest of the application area.
Vegetation description	The biological surveys indicate the vegetation within the application area consists of (Western Environmental, 2024): • **GofWaa**: *Grevillea obliquistigma* subsp. *funicularis, Grevillea paradoxa* and *Leptospermum exsertum* (P1) tall to low open shrubland over *Waitzia acuminata* var. *acuminata, Ecdeiocolea monostachya* and *Amphipogon caricinus* var. *caricinus* low mixed open forb/grass land. **Comprises 1.23 hectares of the application area**. • **EeMhAe**: *Eucalyptus ebbanoensis* low isolated clumps of mallee trees over *Melaleuca hamata, Acacia burkittii* and *Grevillea asparagoides* (P3) mid open shrubland over *Austrostipa elegantissima, Chrysitrix distigmatosa* and *Waitzia acuminata* var. *acuminata* low open mixed grass and forbland. **Comprises 1.22 hectares of the application area**. • **ElsEttCe**: *Eucalyptus loxophleba* subsp. *supralaevis* and *Eucalyptus horistes* mid to low open mixed woodland and mallee woodland over *Enchylaena tomentosa* var. *tomentosa, Chenopodium gaudichaudianum* and *Rhagodia drummondii* mid open shrubland over *Calandrinia eremaea, Leontodon rhagadioloides* and *Austrostipa elegantissima* tall to low mixed forb and grassland. **Comprises 0.028 hectares of the application area**. This broad scale mapped vegetation type(s) is: • Beard Perenjori (352), which is described as Wheatbelt; York gum, salmon gum etc. *Eucalyptus loxophleba*, *E. salmonophloia*. Goldfields; gimlet, redwood etc. E. salubris, E. oleosa. Riverine; rivergum *E. camaldulensis*. Tropical; messmate, woolyb (Shepherd et al, 2001). The mapped vegetation type retains around 17.3 per cent of its pre-European extent (Government of Western Australia, 2019). A very small portion of the application area (0.03 hectares), being vegetation type ElsEttCe, is representative of this community.
Vegetation condition	The biological surveys indicate the vegetation in the application area is in very good to completely degraded (Keighery, 1994) condition (Western Environmental, 2024): • Very good – 0.22 hectares (9 per cent) • Good – 0.36 hectares (14 per cent) • Degraded – 1.89 hectares (76 per cent) • Completely degraded – 0.016 hectares (1 per cent) A description of each vegetation condition type is provided in Appendix C.
Climate and landform	The application area is within the Granada system, characterised by undulating terrain, broad ridges & shallow valleys. Weathered adamellite-granodiorite. Yellow and brown

Characteristic	Details
	deep sands, brown and red sandy earths, red-brown hardpan shallow loams & sandy and loamy duplexes. The application area lies on a relatively flat landform at an elevation of around 300 metres above sea level. The climate of Perenjori is described as semi-arid, with an average annual rainfall of around 290 millimetres.
Soil description and erosion risk	The soils within the application area are mapped as the Granada 1 Subsystem (271Gn1), described as undulating plain to low rises with broad convex gently inclined slopes; yellow and brown deep sands and loamy earths, with some shallow loams over red-brown hardpans. According to land degradation risk mapping, the greatest risk of land degradation associated with these soils is wind erosion.
Waterbodies / watercourses / Hydrogeology	The application area lies within the Yarra Monger Hydrographic Catchment and the Yarra Hydrographic Sub-catchment. There are no wetlands or watercourses within the application area. The closest mapped waterbody is a minor non-perennial watercourse recorded 285 metres north east of the application area. Groundwater salinity within the application area is mapped as 7000 to 14000 milligrams per litre total dissolved solids.
Conservation listed flora	The flora surveys identified two priority flora species within the application area (AECOM, 2023; AECOM 2024; BDS, 2022): • *Apectospermum exsertum* (Priority 3); and • *Grevillea granulosa* (Priority 3) No threatened flora have been recorded within or nearby the application area.
Ecological communities	A small portion of the application area is mapped as the Eucalypt woodlands of the Western Australian Wheatbelt ecological community which is listed as Priority 3 by DBCA, and critically endangered under the EPBC Act. The flora and vegetation survey did not identify an occurrence of this community (AECOM, 2023).
Conservation listed fauna	The closest conservation listed fauna record to the application area is a malleefowl, (*Leipoa ocellata*) (vulnerable) located 2.66 kilometres from the application area.

A.2 Vegetation extent

	Pre-European extent (ha)	Current extent (ha)	Extent remaining (per cent)	Current extent in all DBCA managed land (ha)	Current proportion (per cent) of pre-European extent in all DBCA managed land
IBRA bioregion*					
Avon Wheatbelt	9,517,109.61	1,761,187.42	18.51	174,980.68	1.84
Vegetation association within Wheatbelt Bioregion*					
Beard vegetation association 352 – Perenjori	630,577.61	108,887.52	17.27	10,191.45	1.62

	Pre-European extent (ha)	Current extent (ha)	Extent remaining (per cent)	Current extent in all DBCA managed land (ha)	Current proportion (per cent) of pre-European extent in all DBCA managed land
Local area (calculation - delete if not required)					
20km radius	131,667.23	18,722.11	14.22	-	-

A.3 Fauna analysis table

With consideration for the site characteristics set out above, relevant datasets, and biological survey information, impacts to the following conservation significant fauna required further consideration.

Species name	Conservation status	Suitable habitat features? [Y/N]	Distance of closest record	Are surveys adequate to identify? [Y, N, N/A]
Apectospermum exsertum	Priority (P) 3	Y	Recorded within application area	Y
Baeckea sp. Perenjori (J.W. Green 1516)	P2	Y	Recorded 30 metres from application area	Y
Enekbatus longistylus	P3	Y	Recorded 24 metres from application area	Y
Grevillea asparagoides	P3	Y	Recorded 78 metres from application area	Y
Grevillea granulosa	P3	Y	Recorded within application area	Y

Appendix B. Assessment against the clearing principles

Species name	Conservation status	Suitable habitat features? [Y/N]	Known from within the local area (20 km radius surrounding the application area)	Did surveys identify? [Y, N, N/A]
Egernia stokesii badia (western spiny-tailed skink)	VU; BC Act, EN EPBC Act	Y –marginal habitat	Y	N
Leipoa ocellata (malleefowl)	VU; BC Act & EPBC Act	Y –marginal habitat	Y	N
Idiosoma nigrum (shield-backed trapdoor spider)	EN; BC Act & VU; EPBC Act	Y – marginal habitat	Y	N
Zanda latirostris (Carnaby's cockatoo)	EN; BC Act & EPBC Act	Y – foraging	Y	N

T: threatened, CR: critically endangered, EN: endangered, OS: other specially protected fauna (BC Act) VU: vulnerable, P: priority (DBCA listed)

A.3 Flora analysis table

With consideration for the site characteristics set out above, relevant datasets, and biological survey information, impacts to the following conservation listed flora required further consideration.

Assessment against the clearing principles	Variance level	Is further consideration required?
Environmental value: biological values		
Principle (a): *"Native vegetation should not be cleared if it comprises a high level of biodiversity."* Assessment: The application area comprises a high level of biodiversity as it includes vegetation in a good and very good (Keighery, 1994) condition (Western Environmental, 2024) and two priority listed flora species.	At variance	Yes *Refer to Section 3.2.1, above.*
Principle (b): *"Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna."* Assessment: The application area provides marginal habitat for several conservation listed fauna species (BCE, 2023). While the proposed clearing is not likely to impact on significant habitat for these species, the impact to fauna habitat warranted further assessment under Section 3.2.3.	Not likely to be at variance	Yes *Refer to Section 3.2.3, above.*
Principle (c): *"Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora."* Assessment: There are no threatened flora mapped within or adjacent to the application area. Appropriately timed flora surveys of the application area did not identify any BC Act or EPBC Act listed flora species (AECOM, 2023; AECOM, 2024;	Not likely to be at variance	No

Assessment against the clearing principles	Variance level	Is further consideration required?
BDS, 2022). The application area is therefore unlikely to contain or be necessary for the continued existence of any threatened flora.		
Principle (d): *"Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a threatened ecological community."* Assessment: A small portion of the application area is mapped as the Eucalypt woodlands of the Western Australian Wheatbelt threatened ecological community. The flora and vegetation survey determined that the application area is not likely to represent this community (AECOM, 2023).	Not likely to be at variance	Yes *Refer to Section 3.2.2, above.*
Environmental value: significant remnant vegetation and conservation areas		
Principle (e): *"Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared."* Assessment: The application area is within an extensively cleared landscape and comprises environmentally significant native vegetation.	At variance	Yes *Refer to Section 3.2.1, above.*
Principle (h): *"Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area."* Assessment: The closest conservation area to the application area is West Perenjori Nature Reserve, located 5.2 kilometres southwest. Given the distance to the nearest conservation area, the proposed clearing is not likely to have an impact on the environmental values of this reserve, or on any other conservation areas within the broader Merredin subregion.	Not likely to be at variance	No
Environmental value: land and water resources		
Principle (f): *"Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland."* Assessment: The application area does not intersect any known watercourses or wetlands, and no riparian vegetation was identified during the biological surveys (AECOM, 2023; AECOM, 2024; BDS, 2022). Noting the above, the vegetation within the application area is unlikely to be growing within, or in association with an environment associated with a watercourse or wetland.	Not likely to be at variance	No
Principle (g): *"Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation."* Assessment: The sandy soils mapped over the application area (Granada 1 Subsystem) are susceptible to wind erosion and salinity has been noted in the local area. While the proposed clearing is not likely result in appreciable land degradation, this potential impact warranted further assessment under Section 3.2.4.	Not likely to be at variance	Yes *Refer to Section 3.2.4, above.*

Assessment against the clearing principles	Variance level	Is further consideration required?
Principle (i): *"Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water."* Assessment: The application area is on relatively flat topography and does not intersect any surface water sources. The nearest watercourse is a minor non-perennial watercourse 285 metres northeast of the application area, which is separated from the application area by a road and cleared agricultural land. The proposed clearing is therefore unlikely to impact on surface water quality. Groundwater salinity within the application area is mapped at between 7000 and 14000 milligrams per litre total dissolved solids (moderate – high). Salinity is evident within the local area, and the cumulative removal of native vegetation is known to contribute to the ongoing increase in Wheatbelt salinity. However, the proposed clearing is linear and largely comprises shrubland, rather than large deep-rooted trees. Noting this, the avoidance of native vegetation on the opposite side of the rail, and that the application area is mapped as having a low risk of salinity, the proposed clearing is not likely to impact on the quality of groundwater through salinity. The proposed clearing will not intercept groundwater.	Not likely to be at variance	No
Principle (j): *"Native vegetation should not be cleared if the clearing of the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding."* Assessment: Noting the mapped highly permeable soils, relatively flat topography, and relatively low annual rainfall (290 millimetres), the proposed clearing is not likely to cause or exacerbate flooding.	Not likely to be at variance	No

Appendix C. Vegetation condition rating scale

Vegetation condition is a rating given to a defined area of vegetation to categorise and rank disturbance related to human activities. The rating refers to the degree of change in the vegetation structure, density and species present in relation to undisturbed vegetation of the same type. The degree of disturbance impacts upon the vegetation's ability to regenerate. Disturbance at a site can be a cumulative effect from a number of interacting disturbance types.

Considering its location, the scale below was used to measure the condition of the vegetation proposed to be cleared. This scale has been extracted from: Keighery, B.J. (1994) *Bushland Plant Survey: A Guide to Plant Community Survey for the Community*. Wildflower Society of WA (Inc). Nedlands, Western Australia.

Measuring vegetation condition for the South West and Interzone Botanical Province (Keighery, 1994).

Condition	Description
Pristine	Pristine or nearly so, no obvious signs of disturbance.
Excellent	Vegetation structure intact, with disturbance affecting individual species; weeds non-aggressive.
Very good	Vegetation structure altered, with obvious signs of disturbance. For example, disturbance to vegetation structure caused by repeated fires, the presence of some more aggressive weeds, dieback, logging and/or grazing.
Good	Vegetation structure significantly altered by very obvious signs of multiple disturbances. Retains basic vegetation structure or ability to regenerate it. For example, disturbance to vegetation structure caused by very frequent fires, the presence of some very aggressive weeds at high density, partial clearing, dieback and/or grazing.

Condition	Description
Degraded	Basic vegetation structure severely impacted by disturbance. Scope for regeneration but not to a state approaching good condition without intensive management. For example, disturbance to vegetation structure caused by very frequent fires, the presence of very aggressive weeds, partial clearing, dieback and/or grazing.
Completely degraded	The structure of the vegetation is no longer intact and is completely or almost completely without native species. These areas are often described as 'parkland cleared' with the flora comprising weed or crop species with isolated native trees or shrubs.

Appendix D. Sources of information

D.1. GIS databases

Publicly available GIS Databases used (sourced from www.data.wa.gov.au):

- 10 Metre Contours (DPIRD-073)
- Aboriginal Heritage Places (DPLH-001)
- Cadastre (LGATE-218)
- Contours (DPIRD-073)
- DBCA Legislated Lands and Waters (DBCA-011)
- Directory of Important Wetlands in Australia – Western Australia (DBCA-045)
- Environmentally Sensitive Areas (DWER-046)
- Groundwater Salinity Statewide (DWER-026)
- Hydrography – Inland Waters – Waterlines
- Hydrological Zones of Western Australia (DPIRD-069)
- IBRA Vegetation Statistics
- Local Planning Scheme – Zones and Reserves (DPLH-071)
- Native Title (ILUA) (LGATE-067)
- Offsets Register – Offsets (DWER-078)
- Pre-European Vegetation Statistics
- Public Drinking Water Source Areas (DWER-033)
- Ramsar Sites (DBCA-010)
- Remnant Vegetation, All Areas
- RIWI Act, Groundwater Areas (DWER-034)
- RIWI Act, Surface Water Areas and Irrigation Districts (DWER-037)
- Soil Landscape Mapping – Best Available
- Soil Landscape Mapping – Systems
- Wheatbelt Wetlands Stage 1 (DBCA-021)

Restricted GIS Databases used:

- ICMS (Incident Complaints Management System) – Points and Polygons
- Threatened Flora (TPFL)
- Threatened Flora (WAHerb)
- Threatened Fauna
- Threatened Ecological Communities and Priority Ecological Communities

D.2. References

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AECOM Australia Pty Ltd (AECOM) (2024) *Perenjori – Targeted Flora Survey*. Prepared for CBH Group (DWER reference DWERDT1045686).

Bamford Consulting Ecologists (BCE) (2023) *Perenjori Fauna Assessment*. Prepared for CBH Group. (DWER reference DWERDT1045686).

Bio Diverse Solutions (BDS) (2022) *Reconnaissance Flora, Vegetation and Basic Fauna Survey Report*. CBH Perenjori Receival Site (DWER reference DWERDT945971).

CBH Group Pty Ltd (CBH) (2024) *Perenjori Offset Proposal (CPS 10589/1)* (DWER reference DWERDT1068078).

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Western Environmental (2024) *CBH Perenjori Rail Out-loading. Native Vegetation Clearing Permit. Supporting Documentation*. Prepared for CBH Group (DWER reference DWERDT945265).