GOVERNMENT OF
WESTERN AUSTRALIA

CLEARING PERMIT

Granted under section 51E of the Environmental Protection Act 1986

Purpose Permit number:	CPS 11097/1
Permit Holder:	Co-operative Bulk Handling Limited (CBH)
Duration of Permit:	From 15 July 2026 to 15 July 2044

ADVICE NOTE

Allocation of offset area and rehabilitation

The offset referred to in *condition* 10 provides for the conservation in perpetuity of 7.1 hectares of *native vegetation* (within an 8.4 hectare footprint area), in Lot 18239 on Deposited Plan 139910, North Baandee. The offset area contains vegetation representative of the *Wheatbelt Woodlands TEC* and comprises a significant remnant within an extensively cleared landscape.

The *rehabilitation* offset referred to in *condition* 11 is intended to:

- maintain areas of the *Wheatbelt Woodlands TEC* in '*Very Good*' *condition* and '*Excellent*' *condition* by reducing the threat of the existing surrounding agricultural land use; and
- improve a 1.3-hectare area of the *Wheatbelt Woodlands TEC* from *'Good' condition* to *'Very Good*' *condition* through implementation of the *rehabilitation* measures specified in the *offset management plan*.

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 railway infrastructure upgrades.

2. Land on which clearing is to be done

Lot 7174 on Deposited Plan 118362, Kellerberrin
Lot 7175 on Deposited Plan 118363, Kellerberrin
Unallocated Crown Land (PIN 955681), Kellerberrin
Mather Road Reserve (PIN 11717265), Kellerberrin
Railway Reserve (PIN 955667), Kellerberrin

3. Clearing authorised

The permit holder must not clear more than 1.48 hectares of *native vegetation* within the area cross-hatched yellow in Figure 1 of Schedule 1 and Figure 2 of Schedule 1.

4. Period during which clearing is authorised

The permit holder must not clear any *native vegetation* after 15 July 2031.

PART II – MANAGEMENT CONDITIONS

5. 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.

6. Weed and dieback 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* and *dieback*:

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

(b) ensure that no known *dieback* or *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.

7. Demarcation of the clearing area

Prior to *clearing* under this permit where adjacent to other *native vegetation*, the permit holder must demarcate the *clearing* area to avoid the inadvertent removal of adjacent *native vegetation*.

8. Fauna management – directional clearing

The permit holder must conduct *clearing* authorised under this permit in a slow, progressive manner to allow fauna to move into adjacent areas ahead of *clearing*.

9. Soil erosion management

The permit holder must commence construction works within three months of completing *clearing* to mitigate soil erosion risks.

10. Offset – conservation covenant

Within 12 months of undertaking the *clearing* authorised under this permit, and no later than 15 July 2028, the permit holder must provide to the *CEO* a copy of a conservation covenant registered under section 30B of the *Soil and Land Conservation Act 1945* over the 8.4-hectare area cross-hatched red in Figure 3 of Schedule 1, being a portion of Lot 18239 on Deposited Plan 139910, North Baandee.

11. Offset – vegetation management and rehabilitation

(a) Within 6 months of commencing *clearing* under this permit, and no later than 15 July 2027, the permit holder must commence implementing the *offset management plan* for the area cross-hatched red in Figure 3 of Schedule 1.

(b) In implementing the *offset management plan* under *condition* 11(a), the permit holder must:

(i) maintain the condition of the 1.5 hectares of vegetation *recorded* as *'Excellent' condition* for the duration of the 10 year monitoring period;

(ii) maintain the condition of the 4.3 hectares of vegetation *recorded* as *'Very Good' condition* for the duration of the 10 year monitoring period; and

(iii) *rehabilitate* the 1.3 hectares of vegetation *recorded* as *'Good' condition* to at least *'Very Good' condition*, consistent with *Category A* of the *Wheatbelt Woodlands TEC*, within 10 years.

(c) Within 12 months of commencing implementation of the *offset management plan*, the permit holder must install and maintain *appropriate fencing* around the area outlined red in Figure 4 of Schedule 1.

(d) Within 12 months of commencing implementation of the *offset management plan*, the permit holder must engage an *environmental specialist* to monitor a minimum of six quadrats within the area cross-hatched red in Figure 3 of Schedule 1, annually, for a period of 10 years, including at least two quadrats within each of the *recorded 'Very Good' condition, 'Excellent' condition* and '*Good' condition* areas.

(e) The permit holder must ensure that annual reports are prepared by the *environmental specialist*, based on the monitoring undertaken under *condition* 11(d), outlining success against the vegetation condition requirements under *condition* 11(b).

(f) The permit holder must implement *remedial actions* where monitoring under *condition* 11(d) identifies that:

(i) the vegetation condition requirements under *condition* 11(b)(i) and *condition* 11(b)(ii) are not being maintained; or

(ii) the vegetation condition requirement under *condition* 11(b)(iii) is unlikely to be achieved within 10 years.

(g) If, at the end of the 10 year monitoring period, the *CEO* determines that the vegetation condition requirements in *condition* 11(b) have not been met, the *CEO* may require the permit holder to undertake additional *remedial actions*.

PART III - RECORD KEEPING AND REPORTING

12. 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, vegetation structure, and density of the cleared area; (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 or decimal degrees; (c) the date the area was cleared; (d) the direction in which *clearing* was undertaken; (e) the size of the area cleared in hectares; (f) actions taken to avoid, minimise, and reduce the impacts and extent of *clearing* in accordance with *condition* 5; (g) actions taken to minimise the risk of the introduction and spread of *weeds* and *dieback* in accordance with *condition* 6; (h) actions taken to demarcate the *clearing* area in accordance with *condition* 7; (i) actions taken to avoid and minimise impacts to fauna in accordance with *condition* 8; and (j) actions taken to mitigate soil erosion in accordance with *condition* 9.
2.	In relation to the execution of the conservation covenant over the offset area pursuant to *condition* 10	(a) the location and boundary of the allocated offset area within Lot 18239 on Deposited Plan 139910, North Baandee, recorded digitally as a shapefile; and (b) a copy of the conservation covenant under section 30B of the *Soil and Land Conservation Act 1945* in accordance with *condition* 10.
3.	In relation to vegetation management and *rehabilitation* activities within the offset area pursuant to *condition* 11.	(a) a description of the *rehabilitation* and maintenance activities undertaken; (b) the dates that the *rehabilitation* and maintenance activities were undertaken; (c) the boundaries of the areas maintained and *rehabilitated*, recorded digitally as a shapefile; (d) a list of *native vegetation* species *planted* or *direct seeded*; (e) evidence the required area has been fenced under *condition* 11(c), and actions taken to maintain fencing;

No.	Relevant matter	Specifications
		(f) the location of monitoring quadrats required under *condition* 11(d), recorded using a GPS; (g) at least two photographs of areas *rehabilitated* and maintained, taken annually; (h) in relation to vegetation condition requirements under *condition* 11(b): (i) results of annual monitoring undertaken under *condition* 11(d), against the vegetation condition requirements; and (ii) determinations made by an *environmental specialist* against the vegetation condition requirements. (i) a description of any *remedial actions* undertaken.

13. Reporting

(a) The permit holder must provide to the *CEO*, on or before 31 December of each calendar year, a written report containing:

(i) the records required to be kept under *condition* 12; and

(ii) records of activities done by the permit holder under this permit between 1 July of the preceding calendar year and 30 June of the current 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 31 December of each calendar year.

(c) Prior to 15 April 2044, the permit holder must provide to the *CEO* a written report of records required under *condition* 12, where these records have not already been provided under *condition* 13(a).

DEFINITIONS

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

Table 2: Definitions

Term	Definition
appropriate fencing	means fencing designed to exclude livestock and minimise the risk of native fauna entanglement.
Category A	means a patch condition classification for the *Wheatbelt Woodlands TEC* described in the Approved Conservation Advice (DoE, 2015) for this community. Category A is described as patches likely to correspond to 'Pristine' condition, '*Excellent*' *condition* and '*Very Good*' *condition*, where weed cover is less than 30%.
CEO	Chief Executive Officer of the department responsible for the administration of the clearing provisions under the *Environmental Protection Act 1986*.

Term	Definition
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.
dieback	means the effect of *Phytophthora* species on *native vegetation*.
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.
direct seeding	means a method of re-establishing vegetation through the establishment of a seed bed and the introduction of seeds of the desired plant species.
environmental specialist	means a person with a tertiary qualification in environmental science or equivalent, with at least two years experience relevant to the advice that an environmental specialist is required to provide under this permit, or a person otherwise approved by the *CEO*.
'Excellent' condition	means vegetation described under the Keighery (1994) vegetation condition rating scale as 'Vegetation structure intact, with disturbance affecting individual species; weeds are non-aggressive species' (Keighery, 1994).
EP Act	*Environmental Protection Act 1986* (WA)
fill	means material used to increase the ground level, or to fill a depression.
'Good' condition	means vegetation described under the Keighery (1994) vegetation condition rating scale as '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' (Keighery, 1994).
local provenance	means *native vegetation* seeds and propagating material from natural sources within 50 kilometers and within the same Interim Biogeographic Regionalisation for Australia (IBRA) subregion as the area cleared.
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.
offset management plan	means Appendix E of the following document 'Eco Logical Australia (2026). *Kellerberrin Fixed Rail Siding Upgrade Project, EP Act Offset Proposal (CPS 11097/1)*, prepared for CBH Limited'. The offset management plan describes the actions that will be undertaken to maintain and *rehabilitate* portions of the offset area, including but not limited to: • annual weed control for 10 years • *direct seeding* and/or infill *planting* of *native vegetation* at an *optimal time* using species associated with the Wheatbelt Woodlands TEC • fencing and feral animal control • *remedial actions* if annual monitoring identifies a requirement.
optimal time	means a period suitable for *planting* and *direct seeding*, typically between April and July, unless otherwise approved by the *CEO*.
planting	means the re-establishment of vegetation by planting seedlings of the desired species.
recorded	means as recorded in the following document: 'Eco Logical Australia

Term	Definition
	(2025). *Laird Rd Offset Site Ecological Survey*. Prepared for CBH Group'.
rehabilitate/ed/ing/ion	means the re-establishment of a cover of local provenance *native vegetation* in an area using methods such as natural regeneration, *direct seeding* and/or *planting*, so that the species composition, structure and density is similar to the pre-existing vegetation of the same vegetation type with the offset site.
remedial actions	means actions required to achieve the vegetation condition requirements under *condition* 11(b), including: • infill *planting* or *direct seeding* with species associated with the *Wheatbelt Woodlands TEC* at an *optimal time* using *local provenance,* or where *local provenance* is not available, *native vegetation* from the Avon Wheatbelt Bioregion; • pest control; • fencing upgrades to restrict stock access; • additional targeted *weed* control; and • additional watering, where necessary.
'Very Good' condition	means vegetation described under the Keighery (1994) vegetation condition rating scale as 'Very good condition vegetation is described as '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' (Keighery, 1994).
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.
Wheatbelt Woodland TEC	Means the threatened ecological community known as 'Eucalypt Woodlands of the Western Australian Wheatbelt', listed as critically endangered under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).

END OF CONDITIONS

Meenu Vitarana
MANAGER
NATIVE VEGETATION REGULATION

Officer delegated under Section 20
of the Environmental Protection Act 1986

22 June 2026

Schedule 1

The boundary of the area authorised to clear is shown in Figure 1 and Figure 2. The boundary of the area requiring fencing is shown in Figure 4.

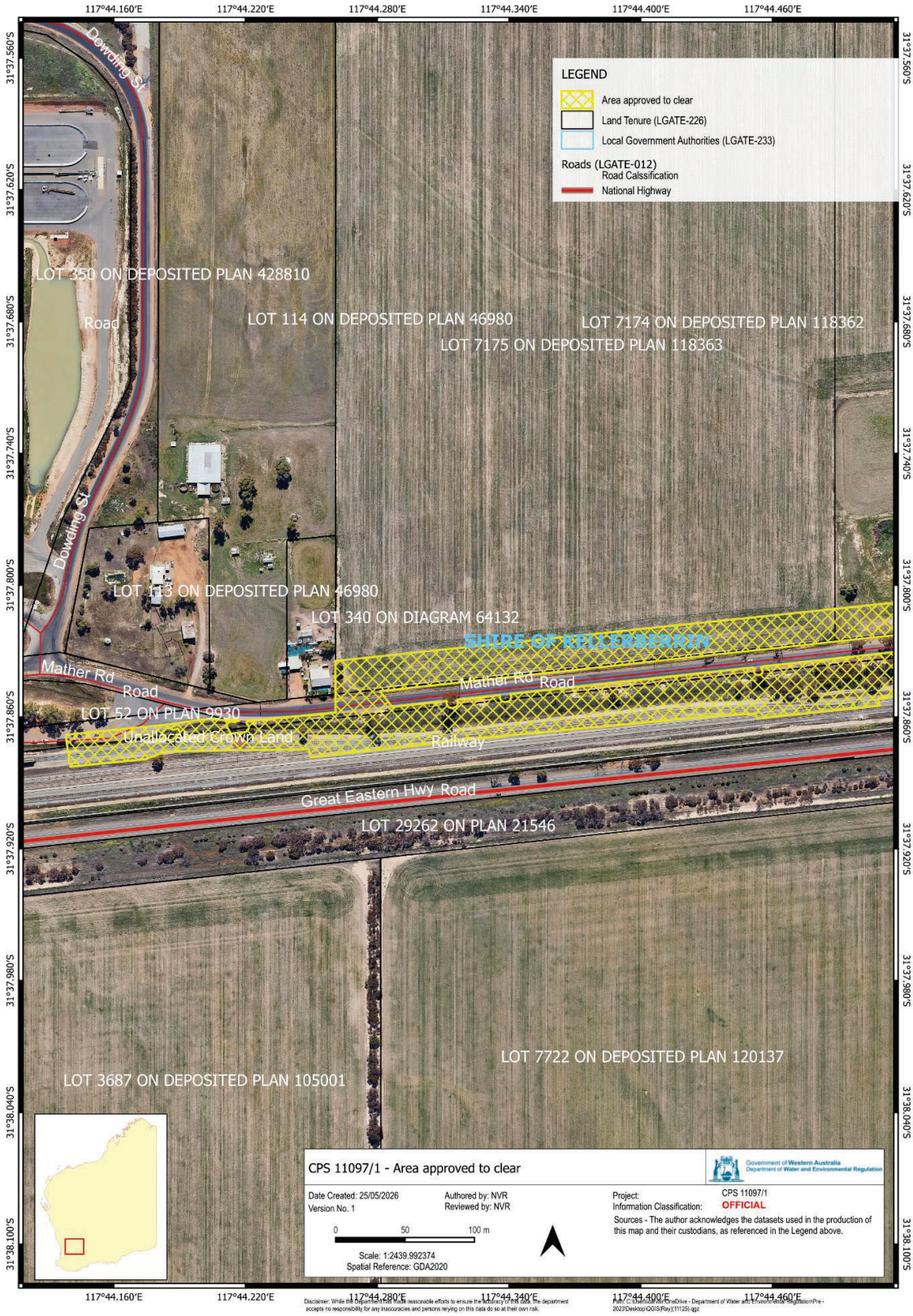

Figure 1: Map of the boundary of the area within which clearing may occur.

Figure 2: Map of the boundary of the area within which clearing may occur.

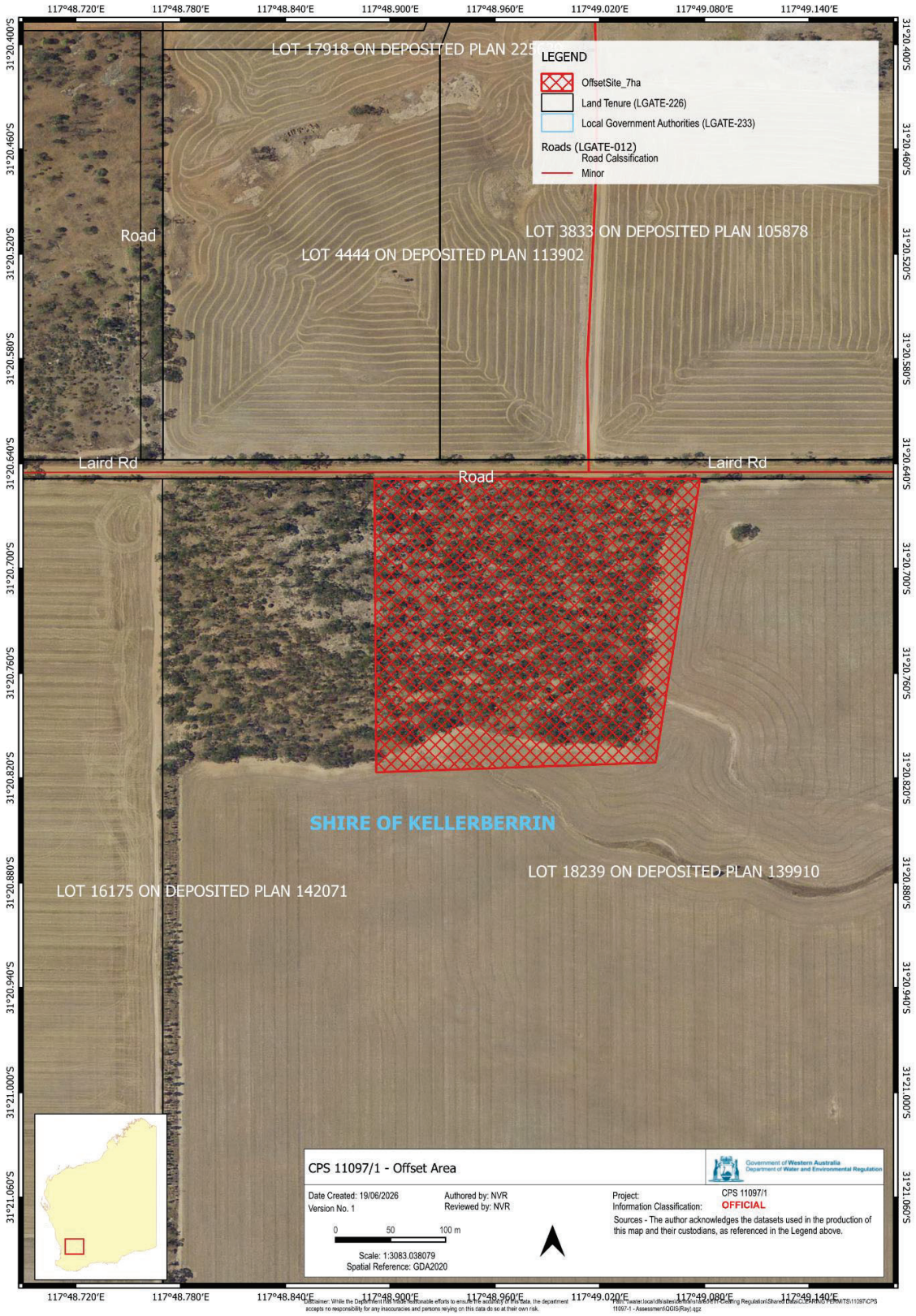

Figure 3: Map of the boundary of the offset area subject to *condition* 10 and *condition* 11.

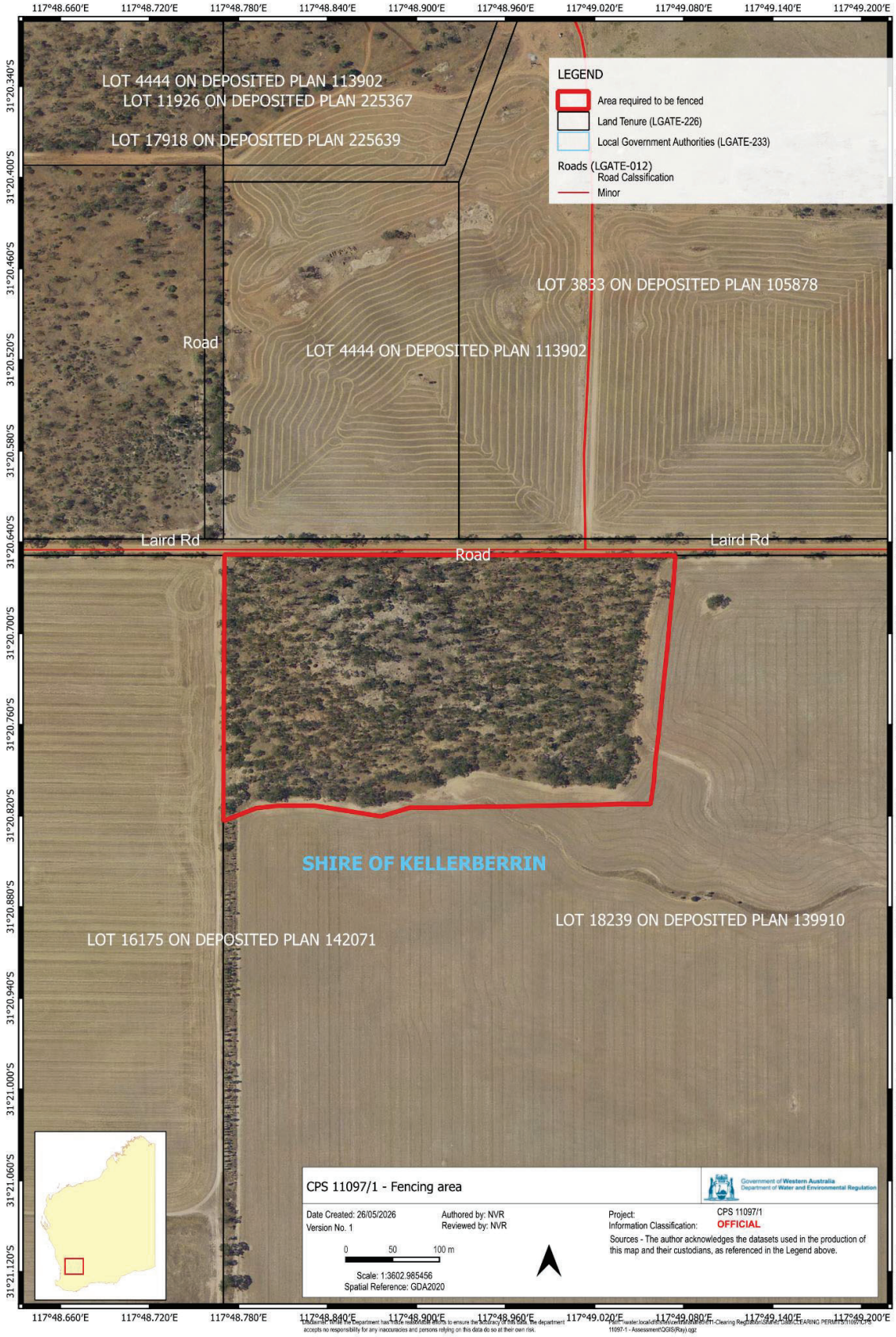

Figure 4: Map of the boundary of the area required to be fenced subject to *condition* 11(c).

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 11097/1
Permit type:	Purpose permit
Applicant name:	Co-Operative Bulk Handling Limited
Application received:	23 May 2025
Application area:	1.48 hectares within a 5.97-hectare footprint
Purpose of clearing:	Upgrading and extending rail infrastructure
Method of clearing:	Mechanical
Property:	Mather Road Reserve (PIN 11717265), Railway Reserve (PIN 955667), Unallocated Crown Land (PIN 955681), Lot 7174 on Deposited Plan 118362 and Lot 7175 on Deposited Plan 118363
Location (LGA area/s):	Shire of Kellerberrin
Localities (suburb/s):	Kellerberrin

1.2. Description of application

Co-operative Bulk Handling Limited (CBH), a Western Australian based agricultural co-operative, proposes to clear up to 1.48 hectares of native vegetation to extend the existing fixed rail siding, adjacent to the CBH Kellerberrin Grain Receival Site. The site is located on the eastern edge of the Kellerberrin townsite and is adjacent to the Great Eastern Highway and Mather Road.

The proposed clearing will enable the extension of the existing fixed rail siding by about 1.2 kilometres to allow the siding to safely and efficiently load trains of up to 88 wagons without impeding the mainline. The works will include:

- ground levelling and compaction;
- the laying of ballast;
- installation and levelling of rail sleepers;
- maintenance of a main access track;
- installation of signage and rail signals; and
- installation of culverts and drainage.

The applicant has advised that the expansion is required to meet projected industry growth (Eco Logical Australia, 2025). The works are also expected to reduce the number of grain truck movements between the facility and the port at Kwinana. This may result in reduced noise levels and potential benefits for emissions, road safety and transport efficiency (Eco Logical Australia, 2025).

The development envelope is 5.97 hectares, of which 4.49 hectares has been previously cleared. The remaining 1.48 hectares of native vegetation is proposed to be cleared (see Figures 1 and 2, Section 1.5). For the purposes of this decision report, the term “development envelope” refers to the 5.97 hectare area, while “application area” refers to the 1.48 hectare proposed clearing area.

1.3. Decision on application

Decision:	Granted
Decision date:	22 June 2026
Decision area:	1.48 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 one public submission was received (refer to Appendix A).

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

- the site characteristics of the application area (see Appendix B);
- relevant environmental datasets (see Appendix G);
- the findings of biological surveys of the application area;
- the clearing principles set out in Schedule 5 of the EP Act (see Appendix C);
- the applicant's efforts to avoid, minimise and mitigate the environmental impacts in accordance with the *WA Environmental Offsets Guidelines* (2014);
- development approval issued by the Shire of Kellerberrin;
- approval issued for the project under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act); and
- other relevant matters detailed in Section 3.

The Delegated Officer also had regard for the need and justification of the proposed clearing, including the following (Eco Logical Australia, 2025):

- the project caters for the growing quantities of grain received from Kellerberrin and the surrounding grain catchment;
- the project supports supply chain efficiencies and aligns with CBH's strategic objectives;
- the project is anticipated to deliver economic and community benefits, including a reduction in haulage trucks on roads, contributing to improved road safety and a reduced risk of roadside impacts to fauna, including Carnaby's cockatoo (*Calyptorhynchus latirostris*); and
- potential benefits including reduced noise, lower emissions, and decreased road maintenance requirements.

The assessment identified that the proposed clearing is likely to result in the following environmental impacts:

- the loss of 1.48 hectares of native vegetation representative of the *Eucalypt Woodlands of the Western Australian Wheatbelt* threatened ecological community (Wheatbelt Woodland TEC)
- the loss of significant remnant vegetation in an extensively cleared area;
- an increased risk of weed and dieback introduction and spread into adjacent vegetation;
- an increased risk of minor localised land degradation; and
- a risk of injury to native fauna during clearing operations.

The Delegated Officer determined that the risks of wind erosion, weed and dieback spread, and fauna injury can be adequately managed through conditions applied to the clearing permit.

The Delegated Officer also considered that the application area is located near the north-eastern extent of Carnaby's cockatoo's distribution, with records of the species in the vicinity limited and dated, with only one record (1975) within 20 kilometres of the application area. As such, the Delegated Officer determined the proposed clearing is not likely to have a significant impact on Carnaby's cockatoo.

The Delegated Officer further determined that the proposed impact to the Wheatbelt Woodland TEC and significant remnant vegetation in an extensively cleared area remain significant after the application of the avoid, minimise and mitigation measures. Therefore, these impacts require counterbalancing with an environmental offset.

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 subject to conditions, requiring management measures and an adequate environmental offset.

The applicant has proposed an environmental offset to counterbalance the abovementioned significant residual impacts. The offset is consistent with the Government of Western Australia's *Environmental Offsets Policy (2011)* and *Environmental Offsets Guidelines (2014)* and is considered adequate to counterbalance the significant residual impacts. The offset involves:

- the conservation in perpetuity of 7.1 hectares of good to excellent condition remnant vegetation representing the Wheatbelt Woodland TEC within an extensively cleared landscape (the offset area); and
- management actions to maintain very good and excellent condition areas and improve areas of good condition (to very good condition) in the offset area, including fencing, weed control, pest control and infill planting, in accordance with an approved offset management plan.

The offset area is located 28 kilometres from the application area in North Baandee, within the Shire of Kellerberrin (see Figure 4). The offset is further described under Section 4.

Given the nature and extent of impacts, the avoidance and minimisation measures applied, and the proposed offset, the Delegated Officer determined that it is appropriate to grant a clearing permit subject to conditions. Therefore, the permit includes conditions requiring the applicant to:

- implement the approved environmental offset, including managing, improving and conserving the offset site in perpetuity;
- demarcate the clearing area to avoid the inadvertent clearing of adjacent native vegetation;
- apply avoidance and minimisation measures to reduce the impacts and extent of clearing;
- implement hygiene and weed control measures to minimise the risk of weed and dieback spread;
- undertake construction within 3 months of clearing to reduce the risk of localised erosion; and
- undertake slow, progressive, one-directional clearing to allow fauna to disperse into adjacent areas.

1.5. Site maps

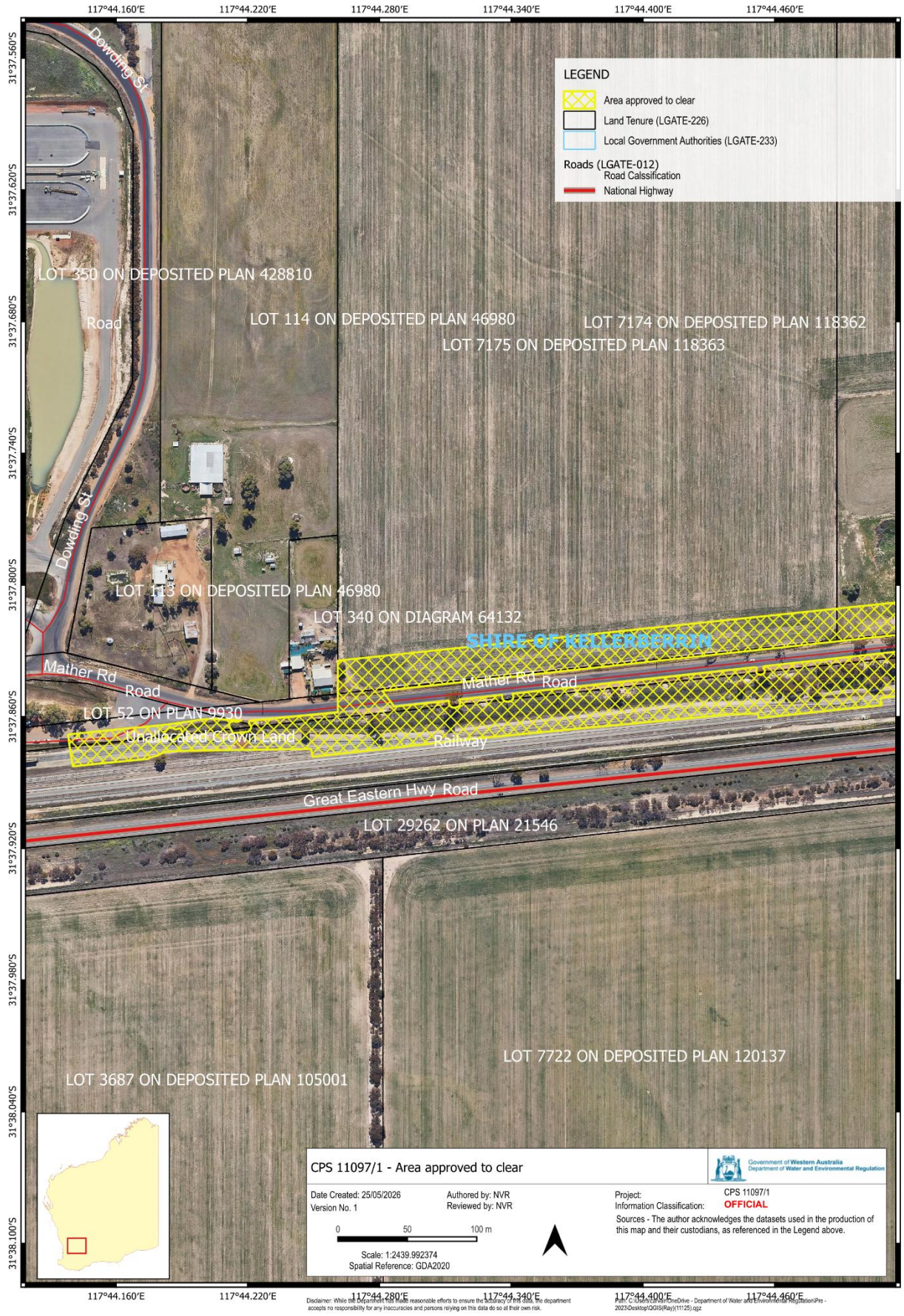

Figure 1 Map of the approved western clearing area, as shown by the area cross-hatched yellow.

Figure 2 Map of the approved eastern clearing area, as shown by the area cross-hatched yellow.

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)
- *Soil and Land Conservation Act 1945* (WA).

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)
- *Procedure: Native vegetation clearing permits* (DWER, October 2019)
- *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, 2016).

3 Detailed assessment of application

3.1. Avoidance, minimisation and mitigation measures

The applicant submitted information outlining measures taken to avoid, minimise and mitigate impacts associated with the proposed clearing (Eco Logical Australia, 2025).

The applicant advised that multiple rail alignments were considered, however only one viable option was identified due to constraints associated with the existing Kellerberrin rail infrastructure and surrounding environment. These constraints included (Eco Logical Australia, 2025):

- the location of existing grain receival site and rail infrastructure;
- requirement to accommodate trains of up to 88 wagons within a single siding;
- proximity to the Kellerberrin townsite;
- land ownership and acquisition constraints;
- rail design requirements specified by Arc Infrastructure;
- requirement to avoid impacts to existing level crossings (Arc Infrastructure requirement); and
- inability to construct a new level crossing by extending the siding north across Mather Road (Arc Infrastructure requirement).

The applicant advised that the proposed clearing footprint represents the minimum extent necessary to achieve the rail upgrade and has used existing cleared areas to the greatest extent (Eco Logical Australia, 2025).

The applicant has also implemented design measures to minimise environmental impacts (Eco Logical Australia, 2025), including:

- avoiding six large *Eucalyptus* trees, including two *Eucalyptus salmonophloia* and one *Eucalyptus loxophleba*, with a diameter at breast height of greater than 500 mm; and
- avoiding 0.3 hectares of a potential patch of the Wheatbelt Woodland TEC recorded on the southern side of the existing rail, towards the end of the proposed rail alignment (see Figure 3).

The avoidance of the *Eucalyptus* trees was achieved by optimising the rail alignment south of Mather Road and refining drainage design, including minimising drainage infrastructure south of Mather Road and locating the majority within areas of cleared agricultural land north of Mather road.

The Delegated Officer is satisfied that the applicant has made a reasonable effort to avoid and minimise impacts to environmental values.

After considering the applicant's avoidance and minimisation measures, the Delegated Officer determined that an environmental offset was required to counterbalance the remaining significant residual impacts, which include the loss of:

- 1.48 hectares of native vegetation that is representative of the Wheatbelt Woodland TEC
- significant remnant vegetation growing in an extensively cleared area.

The applicant has provided an offset proposal to address the above impacts. The offset proposal is in accordance with the Government of Western Australia's *Environmental Offsets Policy (2011)* and *Environmental Offsets Guidelines (2014)*. The offset is considered adequate to counterbalance the significant residual impacts and will be secured through conditions on the clearing permit. The nature and suitability of the offset is provided in Section 4.

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 C) identified that the impacts of the proposed clearing present a risk to conservation listed fauna and ecological communities, significant remnant vegetation and land resources through potential 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. Biological values – ecological communities and conservation listed flora – Principle (a) and Principle (d)

Assessment

Background

The application area was subject to a flora survey to determine the vegetation type, vegetation condition, and the presence of conservation listed flora species and ecological communities (360 Environmental, 2022). The flora survey was undertaken in October 2021 and included targeted searches for conservation significant flora.

The survey also included an assessment of any potential threatened or priority ecological communities against relevant guidance. Specifically, potential occurrences of the *Eucalypt Woodlands of the Western Australian Wheatbelt* threatened ecological community (Wheatbelt Woodland TEC) were assessed against the diagnostic criteria outlined in the Approved Conservation Advice (Department of the Environment (DotE), 2015).

To further clarify the potential presence of this TEC, the applicant commissioned an additional *Wheatbelt Woodlands TEC Assessment Addendum* (TEC Assessment) (360 Environmental, 2023).

The flora survey recorded a total of 34 taxa from 19 genera across 12 families. The dominant families were Myrtaceae (15 species) and Poaceae (four species), with *Eucalyptus* being the most represented genus (14 species). A total of nine introduced (weed) species were recorded, representing about 24% of all taxa. Vegetation within the application area is in degraded to completely degraded condition (360 Environmental, 2022).

Five vegetation types were identified within the application area (refer to Appendix B for full descriptions):

- **EIEs** - *Eucalyptus loxophleba* subsp. *loxophleba* isolated trees over *Acacia* shrubs over weeds (1.46 ha)
- **Es** - isolated *Eucalyptus salmonophloia* (0.03 ha)
- **EI** - *Eucalyptus loxophleba* subsp. *Loxophleba* (0.004 ha)
- **NeE** – Non-endemic *Eucalyptus* (0.02 ha)

- Mixed weeds (1.23 ha).

Threatened and Priority flora

The appropriately timed flora survey did not identify any threatened flora species within the application area. There are no historical records of threatened flora within or adjacent to the site, and no threatened species were considered likely to occur based on site characteristics and habitat requirements of known species in the local area (360 Environmental, 2022).

One Priority species, *Eucalyptus brockwayi* (P3), was recorded in the survey area within the NeE vegetation type (360 Environmental, 2022). This species is not endemic to the Merredin subregion, with all known naturally occurring records around 360 kilometres east within the Eastern Mallee subregion. This individual tree is therefore considered to have been planted, and is not regarded as conservation significant in this location.

No other Priority flora species were recorded, and none were considered likely to occur based on the condition and characteristics of the application area.

Wheatbelt Woodland TEC

The eastern portion of the application area is mapped as the Wheatbelt Woodland TEC (Critically Endangered under the EPBC Act). This Commonwealth TEC is state listed as a priority ecological community (Priority 3). The extrapolated mapping for this TEC is indicative only, and ground truthing is required to confirm its presence (DotE, 2015).

Assessment of TEC presence requires comparison of on-ground conditions against diagnostic characteristics, as well as patch size and condition thresholds outlined in the Approved Conservation Advice (DotE, 2015). These thresholds generally exclude highly degraded areas, including narrow roadside remnants lacking canopy continuity and native understorey structure. For roadside vegetation, a minimum patch width greater than five metres is typically required (DotE, 2015).

The initial flora survey identified three patches potentially consistent with the TEC. However, assessment against diagnostic criteria indicated that these areas lacked one or more defining characteristics (e.g. structure, condition, or patch size; see Table 12 of the flora survey). The survey therefore concluded that no TECs or PECs were present within the survey area (360 Environmental, 2022).

The subsequent TEC Assessment identified four potential TEC patches, one of which (Patch 3) was considered to meet the diagnostic criteria - specifically Category D. Patch 3 largely corresponds with the EIEs vegetation type and comprises the majority of native vegetation within the application area (360 Environmental, 2023).

DWER reviewed these findings against the Approved Conservation Advice and agrees that Patch 3 is likely to represent a Category D occurrence of the Wheatbelt Woodland TEC.

Key threats to this community include (DotE, 2015):

- clearing of native vegetation
- fragmentation
- loss of habitat for native species
- increased salinity and waterlogging associated with landscape modification (DotE, 2015).

Areas critical to the survival of the community include all patches meeting diagnostic and condition thresholds, as well as surrounding buffers, particularly where they comprise native vegetation. This reflects the highly cleared and fragmented nature of the Wheatbelt landscape (DotE, 2015).

Available datasets indicate that about 939,000 hectares of the Wheatbelt Woodland TEC is mapped across Western Australia; however, this remains indicative mapping requiring validation. The proposed clearing represents about 0.00015% of the mapped extent.

While the proposed clearing represents a small overall impact to the mapped extent of the community, the Delegated Officer considers the clearing of 1.48 hectares to be significant given the threat of ongoing clearing of representative patches in the Wheatbelt. The residual impact aligns with the definition of *significant residual impact* under the *WA Environmental Offset Guidelines*, which includes areas defined as being critically impacted in a cumulative context (Government of Western Australia, 2014).

Given the applicant's application of the mitigation hierarchy and the scale of impact, the Delegated Officer determined that an environmental offset is appropriate to counterbalance impacts to the TEC. The applicant has proposed an offset, detailed in Section 4, which is considered to provide an environmental outcome consistent with the Approved Conservation Advice (DotE, 2015).

The proposed clearing will not result in the isolation of any confirmed patches of the community, nor will it considerably increase the distance between patches of the Wheatbelt Woodland TEC. It is considered that the implementation of weed and dieback hygiene management measures will adequately manage the risk of spreading these threats to nearby areas that may support this TEC.

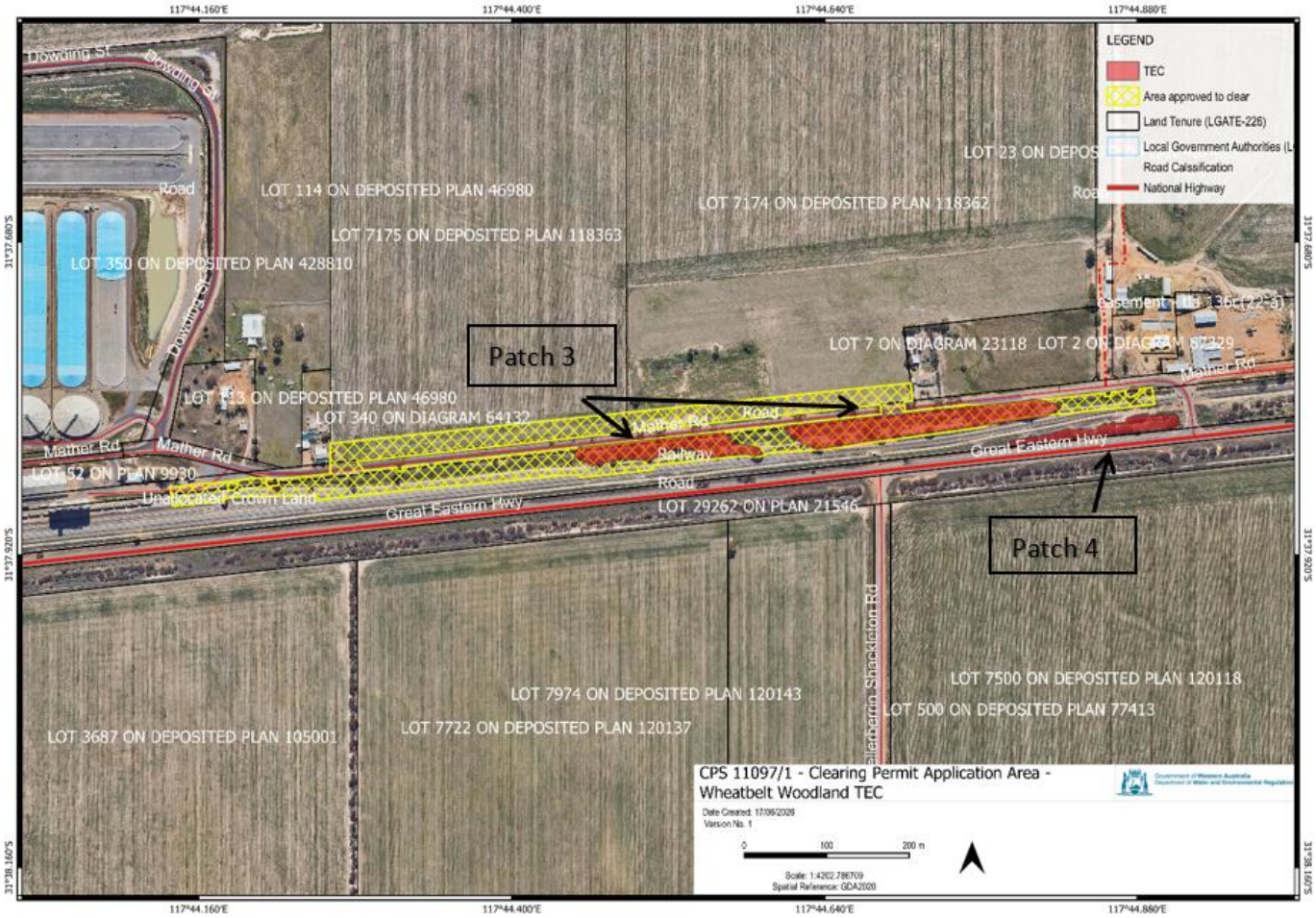

Figure 3. Mapped potential Wheatbelt Woodland TEC within the application area (360 Environmental, 2022).

Conclusion

The proposed clearing will result in the loss of 1.48 hectares of native vegetation representing the Wheatbelt Woodland TEC. This impact is considered significant and therefore requires counterbalancing by an appropriate environmental offset, to be secured through conditions of the clearing permit.

In making this determination, the Delegated Officer considered both the extent of the impact and the applicant's application of the mitigation hierarchy, and determined that an offset is necessary to counterbalance the residual impact.

Conditions

To address the identified impacts, the clearing permit includes conditions requiring the permit holder to:

- implement the approved environmental offset, including managing, improving and conserving in perpetuity the offset site (as described in Section 4);
- demarcate the clearing area to prevent inadvertent clearing of adjacent native vegetation;
- implement avoidance and minimisation measures to reduce the impacts and extent of clearing; and
- implement hygiene management measures to minimise the risk of weed and dieback spread.

3.2.2. Biological values - Fauna - Clearing Principle (b)

Assessment

Background

The applicant commissioned a targeted fauna survey (the fauna survey) over a broader area encompassing the application area, focusing on Carnaby's cockatoo (*Zanda latirostris*) and shield-backed trapdoor spider (*Idiosoma nigrum*) (Bamford Consulting Ecologists (BCE), 2024). The fauna survey included habitat assessments, systematic searches for target species, and opportunistic fauna observations.

Three fauna habitat types were identified within the survey area encompassing the application area (BCE, 2024):

- VSA 1, described as roadside verge and cleared areas with weedy grasses and invasive plant species on sandy brown loam (42% of the survey area);
- VSA 2, described as York Gum as midstorey with scattered mature Salmon Gum over weedy grasses and invasive plant species on sandy brown loam (16% of the survey area); and
- VSA 3, described as *Eucalyptus camaldulensis* and ornamental *Eucalyptus* species over cleared understorey with some weeds and grasses on sandy brown loam (2% of the survey area).

The 360 Environmental (2022) spring biological survey also included a reconnaissance terrestrial vertebrate fauna survey, which similarly identified:

- Mixed endemic and non-endemic Eucalypt woodland;
- Landscaped / garden vegetation; and
- Highly disturbed open grassland.

Database searches identified five conservation significant fauna species within a 10 kilometre radius. Based on habitat suitability, vegetation condition, and proximity of records, the application area is considered to provide suitable habitat for one conservation significant species, being Carnaby's cockatoo. Other species known from the local area, including the shield-backed trapdoor spider (*Idiosoma nigrum*), western spiny-tailed skink (*Egernia stokesii badia*) and peregrine falcon (*Falco peregrinus*) were assessed as unlikely to occur / be significantly impacted. No conservation listed fauna were recorded during field surveys (360 Environmental, 2022; BCE, 2024).

Carnaby's cockatoo (*Zanda latirostris*)

The application area is located near the north-eastern extent of this Endangered (BC Act) species' distribution. DBCA records in the vicinity are limited and dated, with only one record (1975) within 20 kilometres of the application area. The species is considered an irregular visitor to the Kellerberrin area (BCE, 2024).

The application area provides low to moderate quality foraging habitat, primarily through scattered York gum and salmon gum trees. The fauna surveys did not identify any foraging evidence within the broader survey area (BCE, 2024).

The importance of foraging habitat for black cockatoos increases when it occurs within foraging distance of nesting sites (around 12 kilometres) 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 nearest known breeding site is approximately 106 kilometres north-west, and the nearest known (unconfirmed) roost site is 48 kilometres east.

The fauna survey identified 10 trees within the application area that are of a suitable diameter at breast height (300 mm for Salmon and York gum) to provide nesting habitat for Carnaby's cockatoo (BCE, 2024; DAWE, 2023). Of these, seven trees contain hollows that may be suitable for breeding. However, no evidence of breeding was

observed (BCE, 2024). Similarly, while these trees are large enough to provide roost habitat, no evidence of roosting was observed (BCE, 2024).

DWER consulted the Department of Biodiversity, Conservation and Attractions (DBCA) regarding the potential impact to Carnaby's cockatoo habitat. DBCA advised that the application area does not provide significant habitat for Carnaby's black cockatoo given the isolation and degradation of the habitat, limited nearby records of breeding, roosting or individuals, and low foraging value (DBCA, 2025).

Based on the above, the proposed clearing is not likely to impact on significant habitat for Carnaby's cockatoo.

While a specific offset for black cockatoo habitat is not required, the proposed environmental offset may provide conservation benefits for the species through the protection of higher quality Wheatbelt woodland habitat.

Shield-backed Trapdoor Spider (*Idiosoma nigrum*)

The application area falls within the known range of *Idiosoma nigrum* (Endangered (BC Act)) although no records occur within 10 kilometres (closest record approximately 15 kilometres west). A targeted survey was undertaken due to its potential occurrence.

This species has been recorded across an extent of about 8,500 kilometres² within the central-western Wheatbelt bioregions. The species is poorly understood but is generally associated with woodland habitats containing suitable soil and leaf litter for burrow construction (Department of Sustainability, Environment, Water, Population and Communities, 2013).

The fauna survey included systematic searches of suitable microhabitats (BCE, 2024). Limited potential habitat was identified within the broader survey area (14.6 hectares), with only three small shrubs providing suitable leaf litter conditions. No evidence of trapdoor spider burrows was identified (BCE, 2024).

Given the limited availability of suitable habitat, and absence of records or survey detections within the application area, the proposed clearing is unlikely to impact this species.

Other conservation listed fauna

The application area is within the broad range of:

- western spiny-tailed skink (*Egernia stokesii badia*) (Vulnerable; EP Act and Endangered; EPBC Act);
- malleefowl (*Leipoa ocellata*) (Vulnerable; BC Act and EPBC Act); and
- peregrine falcon (Falco peregrinus) (Other specially protected fauna; BC Act).

The application area does not provide suitable habitat for western spiny-tailed skink or malleefowl given an absence of undisturbed hollow log piles and intact shrubland (BCE, 2024), respectively.

The peregrine falcon is highly mobile and typically nests on cliffs or similar structures. No nesting in trees within the application area was observed. Accordingly, the proposed clearing is unlikely to impact these species.

Ecological linkage

Despite being degraded, vegetation within the application area, together with the northern side of the rail reserve and Great Eastern Highway Road Reserve, contributes to east–west fauna linkage values.

The proposed clearing is confined to the northern side of the rail corridor and will not sever this linkage. Vegetation to the south of the rail line and within the Great Eastern Highway reserve (which provides a wider corridor of vegetation approximately 45 metres south) will remain intact. In addition, the applicant has committed to retaining six mature *Eucalyptus* trees on the northern side of the rail adjacent to the application area.

Therefore, the proposed clearing is unlikely to result in a significant disruption to fauna movement, despite the application areas contribution to fauna linkage values.

Other impacts

The proposed clearing presents a risk of injury or mortality to fauna present at the time of clearing. This risk can be minimised through implementing fauna management measures, including slow, progressive, one-directional clearing.

Conclusion

The proposed clearing is not likely to impact on significant habitat for any specific conservation listed fauna. The application area does however contribute to general fauna linkage values in the local area and the proposed clearing may increase the risk of injury to any fauna using the application area at the time of clearing.

While an offset has not be required to counterbalance the impact to fauna habitat, the Delegated Officer considers that the applicants offset proposal will have the effect of improving high quality fauna habitat within the Shire of Kellerberrin, providing a stepping stone for fauna within an extensively cleared landscape.

Conditions

To address the identified impacts, the clearing permit includes conditions requiring the permit holder to:

- demarcate the clearing area to prevent inadvertent clearing of adjacent native vegetation;
- implement avoidance and minimisation measures to reduce the impacts and extent of clearing; and
- undertake slow, progressive, one-directional clearing to allow fauna to disperse into adjacent areas.

3.2.3. Significant remnant vegetation - Clearing 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% 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 extensively cleared for agriculture and retains about 18.51% of its pre-European vegetation extent.

The vegetation within the application area is mapped as Beard Vegetation Association (BVA) 1049, which retains about 6.79% of its pre-European vegetation extent (Government of Western Australia, 2019). This BVA is described as medium woodland comprising wandoo, York gum, salmon gum, morrel and gimlet (Shepherd et al., 2001). Given the presence of York gum and salmon gum throughout the application area, the vegetation is considered representative of this BVA.

The native vegetation within the local area (10-kilometre radius surrounding the application area) has been extensively cleared, with about 9.4% of original vegetation remaining. Based on the above native vegetation extents, the clearing of native vegetation within the application area is inconsistent with the national objectives. The application area contains vegetation representative of the Wheatbelt Woodland TEC, and is therefore a significant remnant within an extensively cleared landscape.

The vegetation within the application area contributes to east-west fauna linkage values associated with the rail reserve and Great Eastern Highway Road Reserve. The proposed clearing is limited to vegetation on the north side of the railway and will not sever the linkage. Vegetation on the southern side of the rail corridor and within the Great Eastern Highway reserve (which provides a wider corridor of vegetation approximately 45 metres south) will remain intact. In addition, the applicant has committed to retaining six mature trees on the northern side of the rail adjacent to the application area. Therefore, the proposal is unlikely to significantly impact fauna movement through the landscape.

Notwithstanding the above, the loss of significant native vegetation within an extensively cleared area represents a significant residual impact that requires counterbalancing by an 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.

The applicant has proposed an environmental offset to counterbalance this impact. The offset involves the permanent protection, maintenance, and improvement of 7.1 hectares of native vegetation representative of the

Wheatbelt Woodland TEC and BVA 1049 within the Shire of Kellerberrin. The Delegated Officer considers that this offset is consistent with the *Environmental Offsets Policy (2011)* and *Environmental Offsets Guidelines (2014)* and is adequate to counterbalance the residual impact.

Conclusion

The proposed clearing will result in the loss of 1.48 hectares of native vegetation that is significant native vegetation within an extensively cleared landscape. This represents a significant residual impact that requires counterbalancing by an environmental offset.

Having considered the extent of impact and the applicant's application of the mitigation hierarchy, the Delegated Officer determined that the proposed offset is appropriate to counterbalance the residual impact.

Conditions

To address the identified impacts, the clearing permit includes conditions requiring the permit holder to:

- implement the approved environmental offset, including managing, improving and conserving the offset area in perpetuity (as described in Section 4);
- demarcate the clearing area to prevent inadvertent clearing of adjacent native vegetation;
- implement avoidance and minimisation measures to reduce the impacts and extent of clearing; and
- implement hygiene measures to minimise weed and dieback spread.

3.2.4. Land degradation - Clearing Principle (g)

Assessment

Land degradation risk mapping for the Kellerberrin–Merredin subsystem soils indicates that this soil type is susceptible to waterlogging and salinity (DPIRD, 2019). In particular:

- 30 to 50% of the map unit is at high to very high risk of salinity-related impacts; and
- more than 70% of the map unit is at moderate to very high risk of waterlogging.

While the soils are also identified as having a high risk of phosphorus export, the proposed clearing is not agricultural in nature, and the application area has not been recently used for agricultural activities. As such, the proposal is not expected to increase the risk of phosphorus export.

The application area is located within an extensively cleared Wheatbelt landscape where salinity is recognised as a regional issue. The applicant identified small areas of potentially salt-affected land adjacent to the application area (Eco Logical Australia, 2025).

Groundwater monitoring data provided by the applicant indicates that the watertable occurs at approximately 5.7 metres below ground level. This is below the level typically associated with high dryland salinity risk (generally less than 2 metres below ground level). The applicant also advised that long-term monitoring data indicates a declining trend in groundwater levels in the vicinity of the application area over the past 20 years (Eco Logical Australia, 2025). However, further clearing has the potential to contribute to localised increases in groundwater levels and mobilisation of stored salts, thereby increasing salinity risk.

The proposed clearing will remove 1.48 hectares of predominantly degraded vegetation within a 1.2 kilometre linear area. The application area contains scattered mature trees, including six living trees with a diameter at breast height of greater than 300 mm. These trees are distributed along the alignment. The fauna survey identified a total of 31 such trees within the broader survey area, indicating that similarly sized trees will remain nearby following clearing. In addition, six mature trees adjacent to the application area will be retained as part of the project design.

Given the extent and linear nature of the proposed clearing, the applicant's tree retention commitment, and the recorded groundwater conditions, the proposed clearing is unlikely to result in a measurable rise in groundwater levels or a corresponding increase in dryland salinity.

Although the mapped soils are susceptible to waterlogging, the scale of clearing, together with the moderate rainfall characteristics of the region and the incorporation of drainage upgrades (including culverts) under the construction environmental management plan, indicate that the proposal is unlikely to result in significant land degradation associated with waterlogging.

The soils are not mapped as being highly susceptible to wind or water erosion. However, there remains a minor risk of erosion and sedimentation if exposed soils are left unvegetated for extended periods following clearing. This risk can be appropriately managed through conditions applied to the clearing permit.

Conclusion

The proposed clearing is unlikely to result in significant land degradation, having regard to soil characteristics, salinity risk, groundwater conditions, and the limited extent and linear nature of the clearing, provided that exposed soils are not left bare for extended periods.

Conditions

To address the identified impacts, the clearing permit includes conditions requiring the permit holder to undertake construction activities within three months of undertaking clearing.

3.3. Relevant planning instruments and other matters

The applicant has obtained development approval from the Shire of Kellerberrin for the proposed works. The approval includes conditions requiring the applicant to:

- manage stormwater on site;
- adhere to CBH's dust management plan; and
- adhere to CBH's construction environmental management plan.

The Shire of Kellerberrin was consulted on the application and advised that it does not object to the proposed clearing (Shire of Kellerberrin, 2025).

The applicant received landowner authority to enter upon and undertake works within Lot 7174 on Plan 118362, and Lot 7175 on Plan 118363.

No Aboriginal Sites of Significance have been mapped within the application area. 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.

The applicant undertook consultation with the South West Aboriginal Land and Sea Council in June, July and October 2022. An archaeological and ethnographic survey of the application area was undertaken in November 2022 with Traditional Owners nominated by the Ballardong Cultural Advice Committee. The survey did not identify any new Aboriginal cultural heritage sites (Eco Logical Australia, 2025).

The applicant advised that Traditional Owners support the project, with a recommendation that cultural monitoring be undertaken by Ballardong representatives during ground disturbance activities (Eco Logical Australia, 2025).

The proposed action was referred to the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW). On 19 June 2025, the delegate determined the proposal to be a controlled action due to potential impacts on the Wheatbelt Woodlands TEC (EPBC reference: 2025/10171). The action was subsequently assessed under the *Environment Protection and Biodiversity Conservation Act 1999*.

On 22 May 2026, DCCEEW granted approval for the controlled action, subject to conditions. While the proposal has not been assessed under an accredited bilateral process, DWER has had regard to relevant Matters of National Environmental Significance in undertaking its assessment.

4 Suitability of offsets

Significant residual impacts

Based on the assessment outlined in Section 3.2, the Delegated Officer has determined that the following significant residual impact remains after the application of avoidance and minimisation measures described in Section 3.1:

- the loss of 1.48 hectares of significant native vegetation within a highly cleared landscape, including vegetation mapped as the extensively cleared Beard Vegetation Association 1049; and
- the loss of 1.48 hectares of vegetation representative of the Wheatbelt Woodland TEC.

The applicant has proposed an environmental offset to counterbalance these impacts. The Delegated Officer considered it appropriate to require an offset given the extent of proposed impact, and the applicant's efforts to avoid and minimise clearing, in accordance with the *Environmental Offsets Guidelines (2014)*.

Proposed offset

Background

To counterbalance the significant residual impacts of this project, the applicant proposes to conserve in perpetuity, maintain, and improve 7.1 hectares of native vegetation within Lot 18239 on Plan 139910, North Baandee, within the Shire of Kellerberrin (Eco Logical Australia, 2026).

The offset area is 28 kilometres from the application area within freehold land zoned 'general agriculture' under the local planning scheme. It occurs within the Avon Wheatbelt bioregion and Merredin subregion, consistent with the application area. The offset area is bordered by agricultural land (see Figure 4).

The offset site is currently privately owned. The applicant has entered into a formal agreement with the landholder to secure conservation of the offset area in perpetuity through a conservation covenant under section 30B of the *Soil and Land Conservation Act 1945* (Eco Logical Australia, 2026).

Offset site values

A biological survey identified that the offset area contains native vegetation of high conservation value within a highly cleared landscape (Eco Logical Australia, 2025a), including:

- 1.5 hectares in excellent condition;
- 4.3 hectares in very good condition;
- 1.3 hectares in a good condition
- vegetation representative of the Wheatbelt Woodland TEC, including:
  - *Eucalyptus loxophleba* woodland; and
  - *Eucalyptus salmonophloia*, *Eucalyptus salubris* and *Eucalyptus sheathiana* woodland.
- vegetation mapped as extensively cleared Beard Vegetation Association 1049, consistent with that mapped over the application area;
- vegetation that provides value as a stepping stone for fauna in an extensively cleared landscape with less than 10% vegetation remaining in the local area; and
- low to moderate quality foraging habitat for Carnaby's cockatoo and 22 trees with a DBH of 300 mm or greater, two of which have suitably sized breeding hollows.

Further information on the offset area is provided in the offset proposal, available online.

Maintenance and rehabilitation measures

In addition to ensuring the conservation in perpetuity of the offset area, the applicant has committed to (Eco Logical Australia, 2026):

- maintain areas in a very good and excellent condition; and
- improve areas in good condition to very good condition, consistent with Category A (highest quality) patch classification, as described in the Approved Conservation Advice (DotE, 2015).

To achieve the above outcomes, the applicant proposes the following management measures (Eco Logical Australia, 2026):

- fencing installation to exclude unauthorised access and grazing stock;
- annual weed control for a minimum 10 years;
- infill planting of good condition areas using species characteristic of the Wheatbelt Woodland TEC;
- implementation of hygiene measures to prevent weed and dieback spread;
- implementing fire management and hygiene protocols;

- feral animal control;
- monitoring using with six quadrats for a minimum of 10 years; and
- implementation of remedial actions where monitoring indicates -
  - a decline in very good and excellent condition areas; and
  - a lack of improvement in good condition areas.

Offset adequacy

To assess whether the proposed offset appropriately counterbalances the residual impacts, DWER applied the WA Environmental Offsets Metric. This assessment determined that the offset is sufficient to counterbalance the significant residual impacts of clearing.

The Delegated Officer considers that the proposed offset is consistent with the *WA Environmental Offsets Policy* (2011) and *WA Environmental Offsets Guidelines* (2014), and adequately counterbalances the residual impacts. Details of the offset calculation and supporting assumptions are available online.

Banked offset

The total area proposed to be placed under a conservation covenant is about 16.3 hectares (of which about 13.3 hectares is vegetated). Of this:

- 7.1 hectares is attributed to this clearing permit application; and
- 1.5 hectares has been allocated to clearing permit CPS 10907/1 (Dowerin rail infrastructure expansion project).

The applicant proposes that the remaining vegetated area secured under the covenant be used as a banked offset for potential future use.

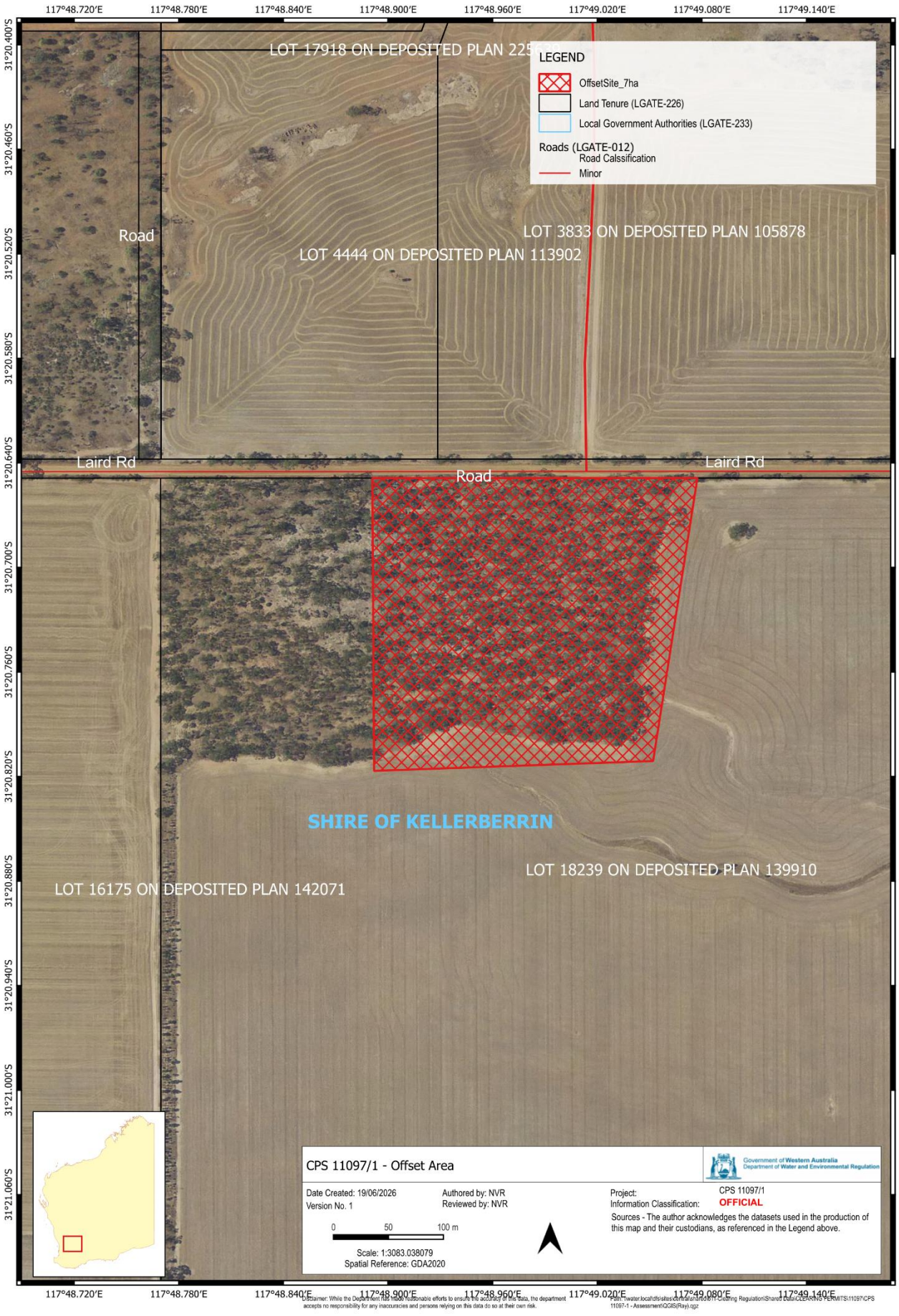

Figure 4. Map of the proposed offset area, as shown cross-hatched red.

Appendix A. Details of public submissions

Summary of comments	Consideration of comment
The vegetation under application has high ecological value given it occurs within an extensively cleared landscape with less than 10% vegetation remaining. Therefore, an offset at a ratio of 5:1 should be secured through the development of a Wheatbelt Environmental Offset fund, which would allow (Submission, 2025): • the purchase of private land containing Wheatbelt woodland for conservation in perpetuity; or • rehabilitation of remnant vegetation in the Wheatbelt on public land.	DWER's assessment identified that the loss of vegetation that represents the Wheatbelt Woodland TEC in the extensively cleared Kellerberrin landscape is a significant residual impact that requires counterbalancing through an environmental offset. As outlined in Section 4, the applicant has submitted an offset proposal that commits to securing around 13.3 hectares of native vegetation in the Shire of Kellerberrin that is representative of the Wheatbelt Woodland TEC for conservation in perpetuity, through a conservation covenant under the SLC Act. Of this area, 7.1 hectares is proposed to counterbalance the impacts of the application, representing an offset ratio of 4.8:1, with the remaining area to be banked for future use. The applicant has committed to implementing management actions within the offset area, including stock exclusion through fencing, maintenance of areas currently in very good to excellent condition, and improvement of approximately 1.3 hectares currently in good condition to very good condition. These actions will be achieved through weed control, infill planting, and feral animal management, in accordance with an approved offset management plan. The Delegated Officer considers that the proposed offset is consistent with the *WA Environmental Offsets Policy* (2011) and *WA Environmental Offsets Guidelines* (2014), and adequately counterbalances the residual impacts.

Appendix B. Site characteristics

B.1. Site characteristics

Characteristic	Details
Local context	The application area is within the intensive land use zone of the Avon Wheatbelt Bioregion and within the Merredin subregion. The application area comprises 5.97 hectares, including 1.48 hectares of native vegetation. It is within a highly cleared agricultural landscape adjacent to the townsite of Kellerberrin. Spatial data indicates the local area (10 km radius from the centre of the application area) retains approximately 9.4% of the original native vegetation cover.
Ecological linkage	The application area is not within a mapped formal ecological linkage, however it does contribute to local linkage values within an extensively cleared landscape.
Conservation areas	The application area is not nearby any known conservation areas. The nearest mapped DBCA managed land is Mournucking Nature Reserve located 6.5 km south. The nearest other mapped conservation area is a 'remnant vegetation protection scheme' area located 1 km east of the application area.
Vegetation description	The flora survey (360 Environmental, 2022) identified the following vegetation types within the application area (where * denotes a weed species): • **EIEs** - *Eucalyptus loxophleba* subsp. *loxophleba* low isolated trees over *Acacia leptopetala*, *A. hemiteles*, and *Rhagodia drummondii* low isolated shrubs over

Characteristic	Details
	Avena* sp., **Lolium rigidum*, and *Rytidosperma caespitosum* low sparse grassland over **Echium plantagineum* low isolated herbs (1.46 ha); • **Es - isolated *Eucalyptus salmonophloia* (0.03 ha); • **El** - *Eucalyptus loxophleba* subsp. *Loxophleba* (0.004 ha); • **NeE** – Non-endemic *Eucalyptus* (0.02 ha); and • Mixed weeds (1.23 ha) Maps of the vegetation types are available online within the flora survey here - Index of /permit/11097. This is consistent with the mapped vegetation type: • Beard 1049, which is described as medium woodland; wandoo, York gum, salmon gum, morrel & gimlet (Shepherd et al, 2001). The mapped vegetation type retains about 6.8% of its original extent (Government of Western Australia, 2019).
Vegetation condition	The flora survey (360 Environmental, 2022) identified that the vegetation within the application area is in degraded to completely degraded (Keighery, 1994) condition. The full Keighery (1994) condition rating scale is provided in Appendix D. Representative photos and the full survey descriptions and mapping are available in the flora survey available online.
Climate	The Avon Wheatbelt bioregion has a semi-arid and warm Mediterranean climate. On average the Kellerberrin weather station receives a total annual rainfall of 328.8 mm, with the highest rainfall occurring between June and August. Mean minimum temperatures range from 5.3°C in August and 16.9°C in February. Mean maximum temperature range from 16.5°C in July to 34.1°C in January.
Soil description and landform	The application area is mapped as the Kellerberrin System (258kb), described as valley floors, in the central zone of ancient drainage, with alkaline red shallow loamy duplex and alkaline grey sandy duplexes mainly in branch valleys (shallow and deep), and calcareous loamy earth and hard cracking clays (DPIRD, 2019). The application is mapped as the 'Kellerberrin, Merredin subsystem' (258KbME) which is described as broad, flat valleys of the eastern Wheatbelt containing heavy, red and grey soils (DPIRD, 2019).
Land degradation risk	The soils of the application area are subject to a high risk of waterlogging and phosphorus export, and a moderate to high risk of salinity.
Waterbodies	According to available datasets and aerial imagery, there are no wetlands or watercourses intersecting or nearby the application area. The closest watercourse is the Yilgarn River (tributary of the Avon River), mapped about 1.1 km from the application area. A man-made drain runs through the western portion of the application area.
Hydrogeography	The application area is within the Avon River System Surface Water Area proclaimed under the *Rights in Water and Irrigation Act 1914*. The area is mapped as having very high salinity levels, with groundwater salinity mapped as >35,000 TDS mg/L (saline).
Flora	There are records of 23 conservation listed flora species within the local area. The nearest mapped record, *Balaustion exsertum* (Priority 3), is located 660 metres from the application area.
Ecological communities	The *Eucalypt Woodlands of the Western Australian Wheatbelt* threatened ecological community (TEC) is mapped within the eastern portion of the application area. The TEC Assessment confirmed that the application area includes 1.48 hectares of vegetation representative of Category D of this TEC.

Characteristic	Details
Fauna	Five conservation listed fauna species have been recorded within the local area. The closest of these records is the western spiny-tailed skink (*Egernia stokesii badia*)(Vulnerable) recorded 2.26 km away.

B.2. Vegetation extent

	Pre-European extent (ha)	Current extent (ha)	Extent remaining (%)	Current extent in all DBCA managed land (ha)	Current proportion (%) of pre-European extent in all DBCA managed land
IBRA bioregion*					
Avon Wheatbelt	9,517,109.95	1,761,187.42	18.51	174,980.68	13.3
Vegetation association					
Beard vegetation association 1049 *	833,384.77	56,618.34	6.79	3,375.83	5.96
Local area					
10 km radius	33,586.52	3,157.97	9.40	-	-

*Government of Western Australia (2019a)

B.3. Flora analysis table

With consideration for the site characteristics set out above, relevant datasets (see Appendix G.1), and biological survey information, impacts to the following conservation significant flora required further consideration.

Species name	Conservation status	Suitable mapped habitat type? [Y/N]	Did survey identify? [Y/N]
Acacia merrickiae	P4	Y	N
Acacia phaeocalyx	P3	Y	N
Baeckea sp. Tammin (R. Coveny 8319 & B. Habberley)	P3	Y	N
Conospermum eatoniae	P3	Y	N
Conospermum galeatum	CR	Y	N
Cryptandra beverleyensis	P3	Y	N
Daviesia nudiflora subsp. drummondii	P3	Y	N
Dicrastylis reticulata	P3	Y	N
Guichenotia impudica	P3	Y	N
Leucopogon amplectens	P3	Y	N
Leucopogon sp. Bungulla (R.D.Royce 3435)	P3	Y	N
Melaleuca manglesii	P1	Y	N
Persoonia pungens	P3	Y	N
Ricinocarpos tuberculatus	P2	Y	N

Species name	Conservation status	Suitable mapped habitat type? [Y/N]	Did survey identify? [Y/N]
Scaevola tortuosa	P1	Y	N
Synaphea constricta	P3	Y	N

CR: critically endangered, EN: endangered, VU: vulnerable, P: priority

B.4. Land degradation risk table

Risk categories	*Risk*
Wind erosion	Nil
Water erosion	Nil
Salinity	30-50% of the map unit has a moderate to high salinity risk of is presently saline
Subsurface Acidification	3-10% of map unit has a high subsurface acidification risk or is presently acid
Flood risk	Nil
Water logging	>70% of map unit has a moderate to very high waterlogging risk
Phosphorus export risk	>70% of map unit has a high to extreme phosphorus export risk

Appendix C. Assessment against the clearing principles

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: While the application area is in a degraded to completely degraded (Keighery, 1994) condition and contains a high weed load, it contains vegetation representative of the Wheatbelt Woodland TEC in a highly cleared landscape, and therefore comprises a high level of biodiversity.	At variance	Yes *Refer to Section 3.2.1.*
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 two conservation-listed fauna species (BCE, 2024). While the proposed clearing is not likely to result in a significant impact to habitat for any particular fauna species, the vegetation contributes to broader fauna linkage values within a highly cleared landscape. Given the role of the vegetation in facilitating fauna movement at a local scale, the proposed clearing may contribute to incremental impacts to fauna habitat connectivity. As such, the potential impacts to fauna values warrant further consideration under Section 3.2.2.	May be at variance	Yes *Refer to Section 3.2.2.*
Principle (c): *"Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora."* Assessment:	Not likely to be at variance	No

Assessment against the clearing principles	Variance level	Is further consideration required?
There are no threatened flora mapped within or adjacent to the application area. An appropriately timed flora survey of the application area did not identify any BC Act or EPBC Act listed flora species (360 Environmental, 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: The application area contains vegetation that is representative of the Wheatbelt Woodland TEC.	At variance	Yes *Refer to Section 3.2.1.*
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 3.2.2.*
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: Given the distance to the nearest conservation area, the proposed clearing is not likely to have an impact on the environmental values of any conservation areas.	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. A drain occurs within the western portion of the application area, however it is unlikely that any native species are growing in association with the drain.	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 soils mapped over the application area are susceptible to waterlogging and salinity. While the proposed clearing is not likely to 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.*
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: Given the absence of nearby wetlands or natural watercourses, the proposed clearing is unlikely to impact on surface water quality. Groundwater salinity within the application area is >35,000 milligrams per litre total dissolved solids (saline). Salinity is evident within the local area, and the	Not likely to be at variance	No

Assessment against the clearing principles	Variance level	Is further consideration required?
cumulative removal of native vegetation is known to contribute to the ongoing increase in Wheatbelt salinity. The proposed clearing will result in the removal of several healthy larger (DBH of greater than 300 mm) deep-rooted trees (mainly salmon gum and York gum). However, the proposed clearing is not likely to impact on the quality of groundwater through salinity given: • the proposed clearing is linear; • larger trees on site are scattered along the 1.2 km alignment; • the degraded to completely degraded understorey; • six large Eucalyptus trees will be retained adjacent to the clearing area; and • the watertable occurs at approximately 5.7 metres below ground level. The proposed clearing is unlikely to intercept groundwater. Potential salinity impacts are further assessed under Section 3.2.4.		
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: Given the absence of nearby wetlands or watercourses, relatively flat topography, and relatively low annual rainfall, the proposed clearing is not likely to cause or exacerbate flooding.	Not likely to be at variance	No .

Appendix D. 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 are non-aggressive species.
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 the area 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/shrubs.

Appendix E. Offset calculator value justification

The offset calculator value justification, using the WA Offsets Metric Calculator, is available online here: Index of /permit/11097.

Appendix F. Biological survey information excerpts

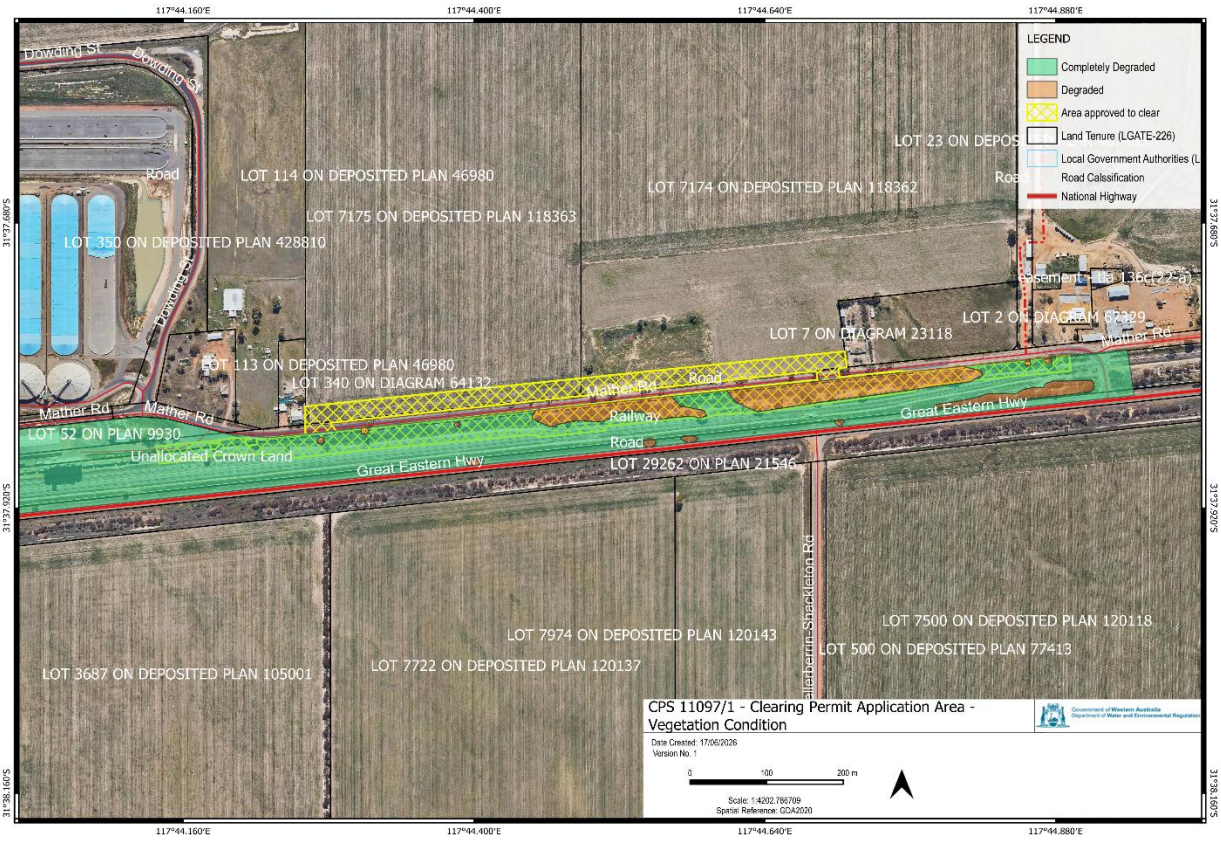

Figure 5. Mapped vegetation condition within the application area (360 Environmental, 2022).

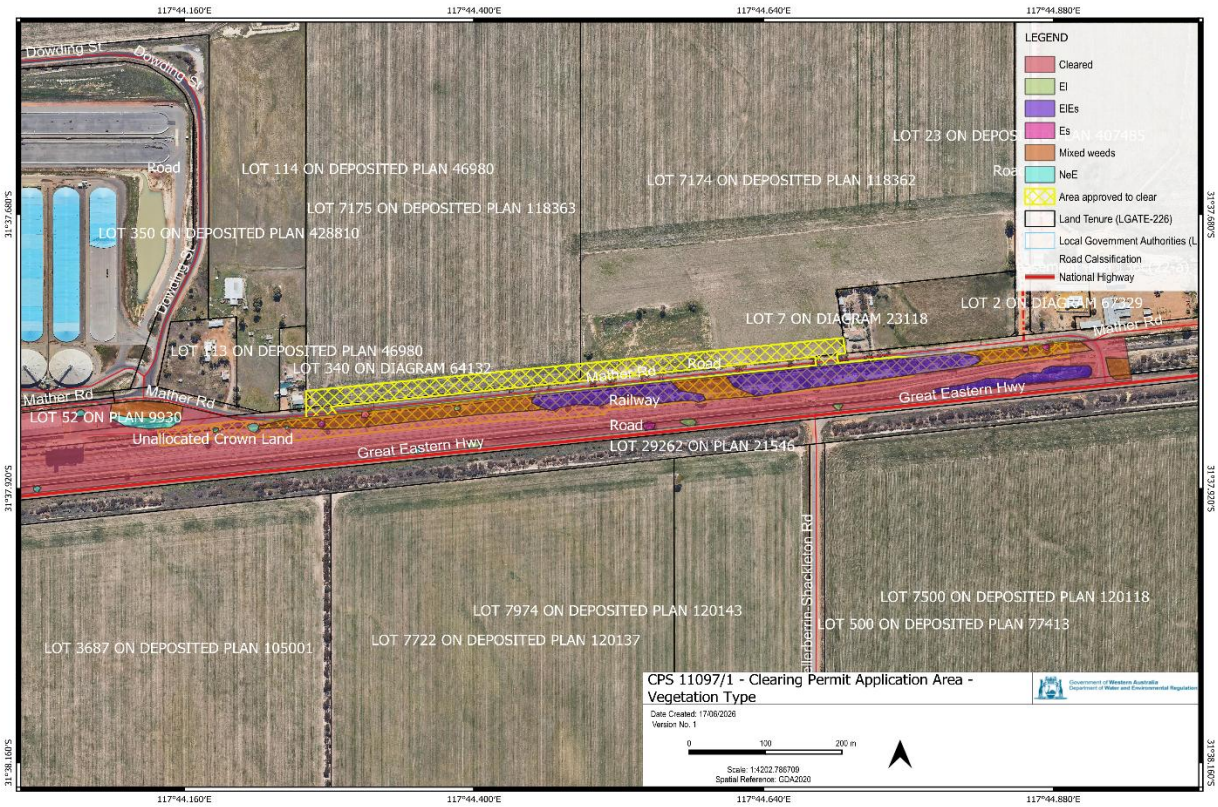

Figure 6. Mapped vegetation types within the application area (360 Environmental, 2022).

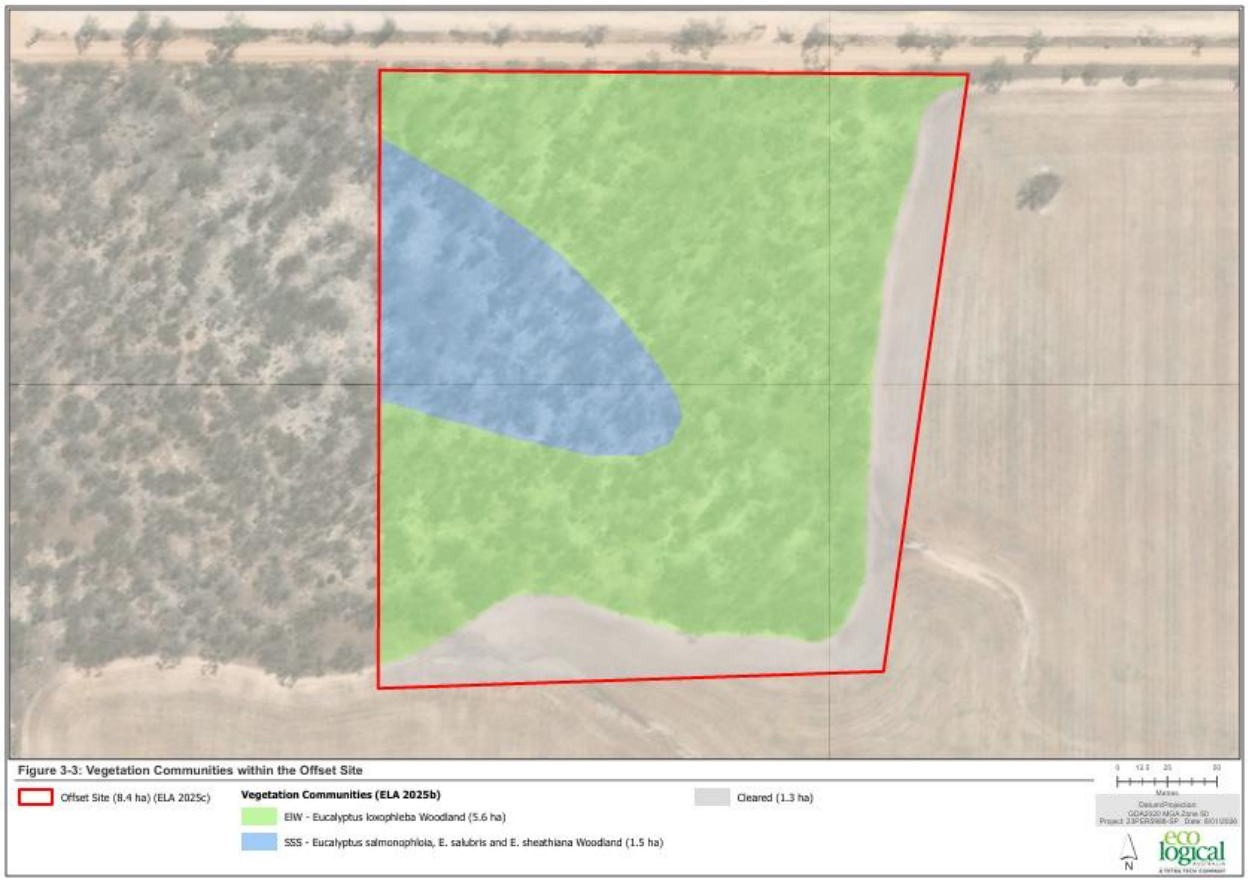

Figure 7. Vegetation type recorded in the offset area (Eco Logical Australia, 2025a).

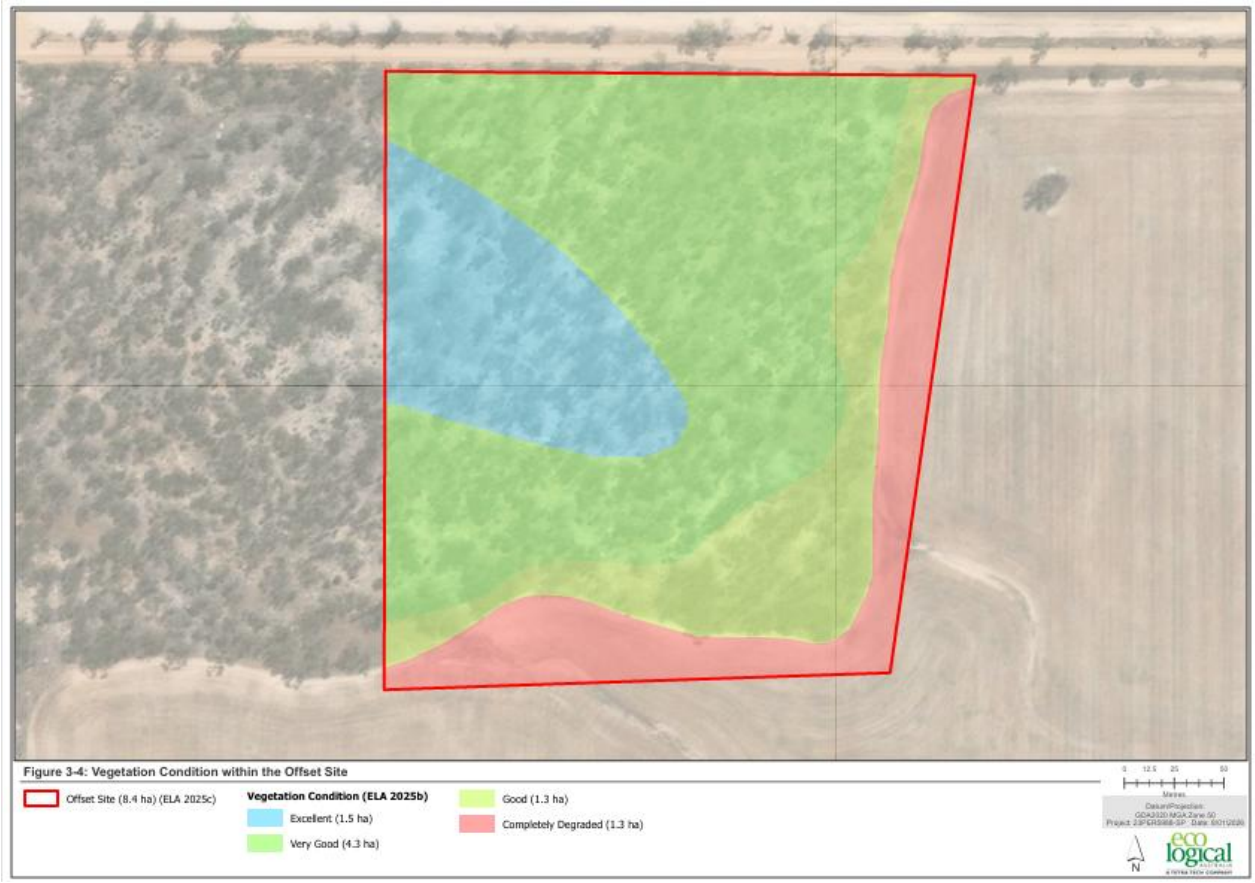

Figure 8. Vegetation condition recorded in the offset area (Eco Logical Australia, 2025a).

Appendix G. Sources of information

G.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)
- Cadastre Address (LGATE-002)
- Contours (DPIRD-073)
- DBCA – Lands of Interest (DBCA-012)
- DBCA Legislated Lands and Waters (DBCA-011)
- Directory of Important Wetlands in Australia – Western Australia (DBCA-045)
- Environmentally Sensitive Areas (DWER-046)
- Flood Risk (DPIRD-007)
- Groundwater Salinity Statewide (DWER-026)
- Hydrography – Inland Waters – Waterlines
- Hydrological Zones of Western Australia (DPIRD-069)
- IBRA Vegetation Statistics
- Imagery
- 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)
- Regional Parks (DBCA-026)
- Remnant Vegetation, All Areas
- RIWI Act, Groundwater Areas (DWER-034)

- RIWI Act, Surface Water Areas and Irrigation Districts (DWER-037)
- Soil Landscape Land Quality – Flood Risk (DPIRD-007)
- Soil Landscape Land Quality – Phosphorus Export Risk (DPIRD-010)
- Soil Landscape Land Quality – Subsurface Acidification Risk (DPIRD-011)
- Soil Landscape Land Quality – Water Erosion Risk (DPIRD-013)
- Soil Landscape Land Quality – Water Repellence Risk (DPIRD-014)
- Soil Landscape Land Quality – Waterlogging Risk (DPIRD-015)
- Soil Landscape Land Quality – Wind Erosion Risk (DPIRD-016)
- 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
- Threatened Ecological Communities and Priority Ecological Communities (Buffers).

G.2. References

360 Environmental (2022) *Kellerberrin Receival Facility Expansion Spring Biological Survey*. Prepared for CBH Group (DWER Reference: DWERDT1202397).

360 Environmental (2023) *Wheatbelt Woodlands TEC Assessment Addendum*. Prepared for CBH Group (DWER Reference: DWERDT1206628).

Bamford Consulting Ecologists (2024) *Kellerberrin Targeted Black-Cockatoo and Trapdoor Spider Assessment.* Prepared for CBH Group (DWER Reference: DWERDT1202396).

Commonwealth of Australia (2001) *National Objectives and Targets for Biodiversity Conservation 2001-2005*, Canberra.

Department of Agriculture, Water and the Environment (DAWE) (2022) *Referral guideline for 3 WA threatened black cockatoo species: Carnaby's Cockatoo, Baudin's Cockatoo and the Forest Red-tailed Black cockatoo.* Department of Agriculture, Water and the Environment, Canberra.

Department of Biodiversity, Conservation and Attractions (DBCA) (2025) *Species and Communities Branch fauna advice for clearing permit application CPS 11097/1*, received 18 December 2020. Department of Biodiversity, Conservation and Attractions, Western Australia (DWER Reference: DWERDT1249937).

Department of Environment Regulation (DER) (2013). *A guide to the assessment of applications to clear native vegetation*. Perth. Available from: https://www.der.wa.gov.au/images/documents/your-environment/native-vegetation/Guidelines/Guide2_assessment_native_veg.pdf.

Department of Primary Industries and Regional Development (DPIRD) (2019). *NRInfo Digital Mapping. Department of Primary Industries and Regional Development.* Government of Western Australia. Available from: https://maps.agric.wa.gov.au/nrm-info/ (accessed May 2026).

Department of the Environment (DotE) (2015). *Approved Conservation Advice (including listing advice) for the Eucalypt Woodlands of the Western Australian Wheatbelt Threatened Ecological Community*. Commonwealth of Australia.

Department of Sustainability, Environment, Water, Population and Communities (DSEWPC) (2013). *Approved Conservation Advice for Idiosoma nigrum (shield-back spider)*. Commonwealth of Australia.

Department of Water and Environmental Regulation (DWER) (2019). *Procedure: Native vegetation clearing permits*. Joondalup. Available from: https://dwer.wa.gov.au/sites/default/files/Procedure_Native_vegetation_clearing_permits_v1.PDF.

Eco Logical Australia (2025) *CBH Kellerberrin Fixed Rail Siding Upgrade Project Native Vegetation Clearing Permit Application Supporting Document*. Prepared for CBH Group (DWER Reference: DWERDT1126436).

Eco Logical Australia (2025a) *Laird Rd Offset Site Ecological Survey*. Prepared for CBH Group (DWER Reference: DWERDT1346054).

Eco Logical Australia (2026) *Kellerberrin Fixed Rail Siding Upgrade Project EP Act Offset Proposal (CPS 11097/1)*. Prepared for CBH Group (DWER Reference: DWERDT1346054).

Environmental Protection Authority (EPA) (2016). *Technical Guidance - Flora and Vegetation Surveys for Environmental Impact Assessment*. Available from: http://www.epa.wa.gov.au/sites/default/files/Policies_and_Guidance/EPA%20Technical%20Guidance%20-%20Flora%20and%20Vegetation%20survey_Dec13.pdf.

Environmental Protection Authority (EPA) (2016). *Technical Guidance – Terrestrial Fauna Surveys.* Available from: https://www.epa.wa.gov.au/sites/default/files/Policies_and_Guidance/Tech%20guidance-%20Terrestrial%20Fauna%20Surveys-Dec-2016.pdf.

Environmental Protection Authority (EPA) (2019). *EPA Technical Report: Carnaby's Cockatoo in Environmental Impact Assessment in the Perth and Peel Region*. Advice of the Environmental Protection Authority under Section 16(j) of the *Environmental Protection Act 1986*. Environmental Protection Authority, WA.

Government of Western Australia (2019) *2018 Statewide Vegetation Statistics incorporating the CAR Reserve Analysis (Full Report). Current as of March 2019.* WA Department of Biodiversity, Conservation and Attractions. Available from: https://catalogue.data.wa.gov.au/dataset/dbca-statewide-vegetation-statistics

Government of Western Australia (2011) *WA Environmental Offsets Policy*. Perth, WA.

Government of Western Australia (2014) *WA Environmental Offsets Guidelines*. August 2014. Perth, WA.

Keighery, B.J. (1994) *Bushland Plant Survey: A Guide to Plant Community Survey for the Community*. Wildflower Society of WA (Inc). Nedlands, Western Australia.

Shire of Kellerberrin (2025) *Advice for clearing permit application CPS 11097/1*, received 10 October 2025 (DWER Reference: DWERDT1210097).

Shepherd, D.P., Beeston, G.R. and Hopkins, A.J.M. (2001) *Native Vegetation in Western Australia, Extent, Type and Status*. Resource Management Technical Report 249. Department of Agriculture, Western Australia.

Submission (2025) *Public submission in relation to clearing permit application CPS 11097/1,* received 29 October 2025 (DWER Reference: DWERDT1220452).

Western Australian Herbarium (1998-). *FloraBase - the Western Australian Flora*. Department of Biodiversity, Conservation and Attractions, Western Australia. https://florabase.dpaw.wa.gov.au/ (Accessed May 2026).