



Your ref: SSD-41294067

Our ref: DOC26/191088

Emily Murray
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure- NSW Planning Group

Via Major Projects Portal: PAE-112832239

Dear Emily

Subject: Copi Mineral Sands Project (SSD-41294067) – Offset credit retirement staging

Thank you for your email dated 1 April 2026 seeking advice from the Conservation Planning and Assessment (CPA) Branch of the NSW Department of Climate Change, Energy, the Environment and Water regarding the Offset Credit Retirement Staging Plan (the letter) for this project.

CPA has reviewed the letter from Biodiversity Australia to DPHI dated 2 April 2026 and the revised Biodiversity Development Report (BDAR) dated 31 March 2026. In summary:

- The credits outlined in Table 1 of the letter for each stage are correct and match the BAM-C cases and the total credits outlined in Table 70 and 71 of the BDAR.
- The stages, BAM-C cases, revision numbers and credits outlined in Table 1 of the letter should be used to draft a Condition of Approval for credit retirement.
- We note that the credit reports provided in Appendix A-4 of the BDAR dated 31 March 2026 should be replaced with the credit reports for each of the six stages. Staged credit summary reports are provided in **Attachment A**.
- Issue 12.2 outlined in our previous correspondence (DOC26/130043 dated 18 March 2026) for Pink Cockatoo has been resolved.

All plans required as a Condition of Approval that relate to biodiversity should be developed in consultation with, and to the satisfaction of, CPA.

If you have any questions about this advice, please contact Leigh Maloney, Principal Conservation Planning Officer via planning.southwest@environment.nsw.gov.au or (02) 6983 4911.

Yours sincerely

Tyrie Starrs
9 April 2026

**Senior Manager South
Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation Group
NSW Department of Climate Change, Energy, the Environment and Water**

ATTACHMENT A – Staged credit reports for Copi Mineral Sands Project (SSD-41294067).

ATTACHMENT A Staged credit reports for Copi Mineral Sands Project (SSD-41294067)

- Stage 1A - 00052608/BAAS25008/25/00055120 – Revision 11
- Stage 1B - 00052608/BAAS25008/24/00052609 – Revision 13
- Stage 2 - 00052608/BAAS25008/26/00065357 – Revision 0
- Stage 3 - 00052608/BAAS25008/26/00065359 – Revision 0
- Stage 4 - 00052608/BAAS25008/26/00065360 – Revision 0
- Stage 5 - 00052608/BAAS25008/26/00065392 – Revision 0

Proposal Details

Assessment Id 00052608/BAAS25008/25/00055120	Proposal Name Copi Sands Linear Corridor	BAM data last updated * 05/08/2025
Assessor Name John Allan Foster	Report Created 02/04/2026	BAM Data version * Current classification (live - default) (82)
Assessor Number BAAS25008	BAM Case Status Finalised	Date Finalised 31/03/2026
Assessment Revision 11	BOS entry trigger	Assessment Type Major Projects

* Disclaimer: BAM data last updated may indicate either complete or partial update of the BAM calculator database. BAM calculator database may not be completely aligned with Bionet.

Ecosystem credits for plant communities types (PCT), ecological communities & threatened species habitat

Zone	Vegetation zone name	TEC name	Current Vegetation integrity score	Change in Vegetation integrity (loss / gain)	Area (ha)	Sensitivity to loss (Justification)	Species sensitivity to gain class	BC Act Listing status	EPBC Act listing status	Biodiversity risk weighting	Potential SAI	Ecosystem credits
Black Oak - Western Rosewood open woodland on deep sandy loams mainly in the Murray Darling Depression Bioregion												
2	58_Mod	Not a TEC	53.8	53.8	48.8	PCT Cleared - 50%	High Sensitivity to Gain			1.75		1150
											Subtotal	1150

Chenopod sandplain mallee woodland/shrubland of the arid and semi-arid (warm) zones												
5	170_Mod	Not a TEC	26.1	26.1	13.6	PCT Cleared - 41%	High Sensitivity to Gain			1.50		133
											Subtotal	133
Narrow-leaved Hopbush - Scrub Turpentine - Senna shrubland on semi-arid and arid sandplains and dunes.												
3	143_Mod	Not a TEC	80.2	80.2	17.2	PCT Cleared - 30%	High Sensitivity to Gain			1.50		517
											Subtotal	517
Pearl Bluebush low open shrubland of the arid and semi-arid plains												
4	154_Mod	Not a TEC	34.2	34.2	102.1	PCT Cleared - 43%	High Sensitivity to Gain			1.50		1308
											Subtotal	1308
Spinifex linear dune mallee mainly of the Murray Darling Depression Bioregion												
6	171_Mod	Not a TEC	63	63.0	6.6	PCT Cleared - 19%	High Sensitivity to Gain			1.50		155
											Subtotal	155

White Cypress Pine open woodland of sand plains, prior streams and dunes mainly of the semi-arid (warm) climate zone											
1	28_Mod	Sandhill Pine Woodland in the Riverina, Murray-Darling Depression and NSW South Western Slopes bioregions	54.6	54.6	0.77	Biodiversity Conservation Act listing status	High Sensitivity to Gain	Endangered Ecological Community	Not Listed	2.00	21
										Subtotal	21
										Total	3284

Species credits for threatened species

Vegetation zone name	Habitat condition (Vegetation Integrity)	Change in habitat condition	Area (ha)/Count (no. individuals)	Sensitivity to loss (Justification)	Sensitivity to gain (Justification)	BC Act Listing status	EPBC Act listing status	Potential SAll	Species credits	
Lophochroa leadbeateri / Pink Cockatoo (Fauna)										
58_Mod		53.8	53.8	3.4	Biodiversity Conservation Act listing status	Species dependent on habitat attributes	Vulnerable	Endangered	False	91
143_Mod		80.2	80.2	0.2	Biodiversity Conservation Act listing status	Species dependent on habitat attributes	Vulnerable	Endangered	False	8

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154_Mod	34.2	34.2	3.9	Biodiversity Conservation Act listing status	Species dependent on habitat attributes	Vulnerable	Endangered	False	67
								Subtotal	166

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00052608/BAAS25008/24/00052609	Copi Mineral Sands Project - Revised Plots	05/08/2025
Assessor Name	Report Created	BAM Data version *
John Allan Foster	02/04/2026	Current classification (live - default) (82)
Assessor Number	BAM Case Status	Date Finalised
BAAS25008	Finalised	31/03/2026
Assessment Revision	BOS entry trigger	Assessment Type
13		Major Projects

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Ecosystem credits for plant communities types (PCT), ecological communities & threatened species habitat

Zone	Vegetation zone name	TEC name	Current Vegetation integrity score	Change in Vegetation integrity (loss / gain)	Area (ha)	Sensitivity to loss (Justification)	Species sensitivity to gain class	BC Act Listing status	EPBC Act listing status	Biodiversity risk weighting	Potential SAI	Ecosystem credits

Black Oak - Pearl Bluebush open woodland of the sandplains of the semi-arid warm and arid climate zones												
3	221_Mod0 1	Not a TEC	57.3	57.3	2.8	PCT Cleared - 30%	High Sensitivity to Gain			1.50		60
											Subtotal	60
Lunette chenopod shrubland mainly of the Murray Darling Depression Bioregion												
1	152_Mod0 1	Not a TEC	49.8	49.8	54.7	PCT Cleared - 27%	High Sensitivity to Gain			1.50		1021
											Subtotal	1021
Pearl Bluebush low open shrubland of the arid and semi-arid plains												
2	154_Mod0 1	Not a TEC	34.2	34.2	71	PCT Cleared - 43%	High Sensitivity to Gain			1.50		910
											Subtotal	910
											Total	1991

Species credits for threatened species

Vegetation zone name	Habitat condition (Vegetation Integrity)	Change in habitat condition	Area (ha)/Count (no. individuals)	Sensitivity to loss (Justification)	Sensitivity to gain (Justification)	BC Act Listing status	EPBC Act listing status	Potential SAI	Species credits

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00052608/BAAS25008/26/00065357	Copi Mineral Sands Project	05/08/2025
Assessor Name	Report Created	BAM Data version *
John Allan Foster	02/04/2026	Current classification (live - default) (82)
Assessor Number	BAM Case Status	Date Finalised
BAAS25008	Finalised	31/03/2026
Assessment Revision	BOS entry trigger	Assessment Type
0		Major Projects

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Ecosystem credits for plant communities types (PCT), ecological communities & threatened species habitat

Zone	Vegetation zone name	TEC name	Current Vegetation integrity score	Change in Vegetation integrity (loss / gain)	Area (ha)	Sensitivity to loss (Justification)	Species sensitivity to gain class	BC Act Listing status	EPBC Act listing status	Biodiversity risk weighting	Potential SAI	Ecosystem credits
Black Oak - Bladder Saltbush on light clays in the arid zone												
12	254_Mod	Not a TEC	60.5	60.5	1.2	PCT Cleared - 10%	High Sensitivity to Gain			1.50		26
											Subtotal	26

Black Oak - Pearl Bluebush open woodland of the sandplains of the semi-arid warm and arid climate zones											
10	221_Mod	Not a TEC	57.3	57.3	70.2	PCT Cleared - 30%	High Sensitivity to Gain			1.50	1509
										Subtotal	1509
Black Oak - Western Rosewood open woodland on deep sandy loams mainly in the Murray Darling Depression Bioregion											
1	58_Mod	Not a TEC	53.8	53.8	148.2	PCT Cleared - 50%	High Sensitivity to Gain			1.75	3489
										Subtotal	3489
Bladder Saltbush shrubland on alluvial plains in the semi-arid (warm) zone including Riverina Bioregion											
5	157_Mod	Not a TEC	77.1	77.1	188.2	PCT Cleared - 60%	High Sensitivity to Gain			1.75	6344
6	157_High	Not a TEC	70	70.0	0.8	PCT Cleared - 60%	High Sensitivity to Gain			1.75	25
										Subtotal	6369

Chenopod sandplain mallee woodland/shrubland of the arid and semi-arid (warm) zones											
7	170_Mod	Not a TEC	26.1	26.1	1.2	PCT Cleared - 41%	High Sensitivity to Gain			1.50	12
										Subtotal	12
Gypseous shrubland on rises in the semi-arid and arid plains											
11	253_Mod	Not a TEC	54.3	54.3	86	PCT Cleared - 30%	High Sensitivity to Gain			1.50	1749
										Subtotal	1749
Lunette chenopod shrubland mainly of the Murray Darling Depression Bioregion											
3	152_Mod	Not a TEC	49.8	49.8	189	PCT Cleared - 27%	High Sensitivity to Gain			1.50	3542
										Subtotal	3542
Pearl Bluebush low open shrubland of the arid and semi-arid plains											
4	154_Mod	Not a TEC	34.2	34.2	824	PCT Cleared - 43%	High Sensitivity to Gain			1.50	10567
										Subtotal	10567

Samphire - Water Weed - Sea-Heath shrubland saline wetland of depressions of the arid and semi-arid (warm) zones											
2	64_Mod	Not a TEC	49.9	49.9	74.9	PCT Cleared - 0%	High Sensitivity to Gain			1.50	1403
										Subtotal	1403
Woollybutt Grass open grassland on red earths of the inland plains											
8	215_Mod	Not a TEC	20.1	20.1	5.1	PCT Cleared - 20%	High Sensitivity to Gain			1.50	38
9	215_High	Not a TEC	31.6	31.6	0.82	PCT Cleared - 20%	High Sensitivity to Gain			1.50	10
										Subtotal	48
										Total	28714

Species credits for threatened species

Vegetation zone name	Habitat condition (Vegetation Integrity)	Change in habitat condition	Area (ha)/Count (no. individuals)	Sensitivity to loss (Justification)	Sensitivity to gain (Justification)	BC Act Listing status	EPBC Act listing status	Potential SAI	Species credits	
<i>Austrostipa nullanulla / A spear-grass (Flora)</i>										
58_Mod		53.8	53.8	1.4	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	58

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64_Mod	49.9	49.9	0.35	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	13
152_Mod	49.8	49.8	1.4	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	52
154_Mod	34.2	34.2	2.2	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	57
157_Mod	77.1	77.1	11.8	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	683
253_Mod	54.3	54.3	17.5	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	713
254_Mod	60.5	60.5	0.83	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	38
								Subtotal	1614

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00052608/BAAS25008/26/00065359	Copi Mineral Sands Project	05/08/2025
Assessor Name	Report Created	BAM Data version *
John Allan Foster	02/04/2026	Current classification (live - default) (82)
Assessor Number	BAM Case Status	Date Finalised
BAAS25008	Finalised	31/03/2026
Assessment Revision	BOS entry trigger	Assessment Type
0		Major Projects

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Ecosystem credits for plant communities types (PCT), ecological communities & threatened species habitat

Zone	Vegetation zone name	TEC name	Current Vegetation integrity score	Change in Vegetation integrity (loss / gain)	Area (ha)	Sensitivity to loss (Justification)	Species sensitivity to gain class	BC Act Listing status	EPBC Act listing status	Biodiversity risk weighting	Potential SAI	Ecosystem credits
Black Oak - Western Rosewood open woodland on deep sandy loams mainly in the Murray Darling Depression Bioregion												
1	58_Mod	Not a TEC	53.8	53.8	2.1	PCT Cleared - 50%	High Sensitivity to Gain			1.75		50
											Subtotal	50

Bladder Saltbush shrubland on alluvial plains in the semi-arid (warm) zone including Riverina Bioregion												
4	157_Mod	Not a TEC	77.1	77.1	102.5	PCT Cleared - 60%	High Sensitivity to Gain			1.75		3455
5	157_High	Not a TEC	70	70.0	2.6	PCT Cleared - 60%	High Sensitivity to Gain			1.75		78
										Subtotal	3533	
Pearl Bluebush low open shrubland of the arid and semi-arid plains												
3	154_Mod	Not a TEC	34.2	34.2	26.3	PCT Cleared - 43%	High Sensitivity to Gain			1.50		337
										Subtotal	337	
Samphire - Water Weed - Sea-Heath shrubland saline wetland of depressions of the arid and semi-arid (warm) zones												
2	64_Mod	Not a TEC	49.9	49.9	336.9	PCT Cleared - 0%	High Sensitivity to Gain			1.50		6309
										Subtotal	6309	
										Total	10229	

Species credits for threatened species

Vegetation zone name	Habitat condition (Vegetation Integrity)	Change in habitat condition	Area (ha)/Count (no. individuals)	Sensitivity to loss (Justification)	Sensitivity to gain (Justification)	BC Act Listing status	EPBC Act listing status	Potential SAI	Species credits
<i>Austrostipa nullanulla / A spear-grass (Flora)</i>									
64_Mod	49.9	49.9	0.04	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	1
154_Mod	34.2	34.2	0.97	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	25
157_Mod	77.1	77.1	0.93	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	54
								Subtotal	80

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00052608/BAAS25008/26/00065360	Copi Mineral Sands Project	05/08/2025
Assessor Name	Report Created	BAM Data version *
John Allan Foster	02/04/2026	Current classification (live - default) (82)
Assessor Number	BAM Case Status	Date Finalised
BAAS25008	Finalised	31/03/2026
Assessment Revision	BOS entry trigger	Assessment Type
0		Major Projects

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Ecosystem credits for plant communities types (PCT), ecological communities & threatened species habitat

Zone	Vegetation zone name	TEC name	Current Vegetation integrity score	Change in Vegetation integrity (loss / gain)	Area (ha)	Sensitivity to loss (Justification)	Species sensitivity to gain class	BC Act Listing status	EPBC Act listing status	Biodiversity risk weighting	Potential SAI	Ecosystem credits
Black Oak - Pearl Bluebush open woodland of the sandplains of the semi-arid warm and arid climate zones												
5	221_Mod	Not a TEC	57.3	57.3	38	PCT Cleared - 30%	High Sensitivity to Gain			1.50		816
											Subtotal	816

Black Oak - Western Rosewood open woodland on deep sandy loams mainly in the Murray Darling Depression Bioregion											
1	58_Mod	Not a TEC	53.8	53.8	7.2	PCT Cleared - 50%	High Sensitivity to Gain			1.75	169
										Subtotal	169
Bladder Saltbush shrubland on alluvial plains in the semi-arid (warm) zone including Riverina Bioregion											
4	157_Mod	Not a TEC	77.1	77.1	61.8	PCT Cleared - 60%	High Sensitivity to Gain			1.75	2083
										Subtotal	2083
Pearl Bluebush low open shrubland of the arid and semi-arid plains											
3	154_Mod	Not a TEC	34.2	34.2	76.2	PCT Cleared - 43%	High Sensitivity to Gain			1.50	977
										Subtotal	977
Samphire - Water Weed - Sea-Heath shrubland saline wetland of depressions of the arid and semi-arid (warm) zones											
2	64_Mod	Not a TEC	49.9	49.9	121.2	PCT Cleared - 0%	High Sensitivity to Gain			1.50	2269
										Subtotal	2269
										Total	6314

Species credits for threatened species

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Vegetation zone name	Habitat condition (Vegetation Integrity)	Change in habitat condition	Area (ha)/Count (no. individuals)	Sensitivity to loss (Justification)	Sensitivity to gain (Justification)	BC Act Listing status	EPBC Act listing status	Potential SAI	Species credits
<i>Austrostipa nullanulla / A spear-grass (Flora)</i>									
64_Mod	49.9	49.9	0.04	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	1
154_Mod	34.2	34.2	0.44	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	11
157_Mod	77.1	77.1	0.53	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	31
								Subtotal	43

Proposal Details

Assessment Id	Proposal Name	BAM data last updated *
00052608/BAAS25008/26/00065392	Copi Mineral Sands Project	05/08/2025
Assessor Name	Report Created	BAM Data version *
John Allan Foster	02/04/2026	Current classification (live - default) (82)
Assessor Number	BAM Case Status	Date Finalised
BAAS25008	Finalised	31/03/2026
Assessment Revision	BOS entry trigger	Assessment Type
0		Major Projects

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Ecosystem credits for plant communities types (PCT), ecological communities & threatened species habitat

Zone	Vegetation zone name	TEC name	Current Vegetation integrity score	Change in Vegetation integrity (loss / gain)	Area (ha)	Sensitivity to loss (Justification)	Species sensitivity to gain class	BC Act Listing status	EPBC Act listing status	Biodiversity risk weighting	Potential SAI	Ecosystem credits
Black Oak - Pearl Bluebush open woodland of the sandplains of the semi-arid warm and arid climate zones												
9	221_Mod	Not a TEC	57.3	57.3	280.9	PCT Cleared - 30%	High Sensitivity to Gain			1.50		6038

10	221_High	Not a TEC	62	62.0	3.1	PCT Cleared - 30%	High Sensitivity to Gain			1.50		72
										Subtotal	6110	
Black Oak - Western Rosewood open woodland on deep sandy loams mainly in the Murray Darling Depression Bioregion												
1	58_Mod	Not a TEC	53.8	53.8	32.4	PCT Cleared - 50%	High Sensitivity to Gain			1.75		762
										Subtotal	762	
Bladder Saltbush shrubland on alluvial plains in the semi-arid (warm) zone including Riverina Bioregion												
5	157_Mod	Not a TEC	77.1	77.1	139.7	PCT Cleared - 60%	High Sensitivity to Gain			1.75		4709
6	157_High	Not a TEC	70	70.0	0.22	PCT Cleared - 60%	High Sensitivity to Gain			1.75		7
										Subtotal	4716	
Chenopod sandplain mallee woodland/shrubland of the arid and semi-arid (warm) zones												
7	170_Mod	Not a TEC	26.1	26.1	0.75	PCT Cleared - 41%	High Sensitivity to Gain			1.50		7
										Subtotal	7	

Gypseous shrubland on rises in the semi-arid and arid plains												
11	253_Mod	Not a TEC	54.3	54.3	54.2	PCT Cleared - 30%	High Sensitivity to Gain			1.50		1103
										Subtotal	1103	
Lunette chenopod shrubland mainly of the Murray Darling Depression Bioregion												
3	152_Mod	Not a TEC	49.8	49.8	5.5	PCT Cleared - 27%	High Sensitivity to Gain			1.50		103
										Subtotal	103	
Pearl Bluebush low open shrubland of the arid and semi-arid plains												
4	154_Mod	Not a TEC	34.2	34.2	566.7	PCT Cleared - 43%	High Sensitivity to Gain			1.50		7262
										Subtotal	7262	
Samphire - Water Weed - Sea-Heath shrubland saline wetland of depressions of the arid and semi-arid (warm) zones												
2	64_Mod	Not a TEC	49.9	49.9	108.4	PCT Cleared - 0%	High Sensitivity to Gain			1.50		2030
										Subtotal	2030	

Spinifex linear dune mallee mainly of the Murray Darling Depression Bioregion											
8	171_Mod	Not a TEC	63	63.0	5.6	PCT Cleared - 19%	High Sensitivity to Gain			1.50	132
										Subtotal	132
										Total	22225

Species credits for threatened species

Vegetation zone name	Habitat condition (Vegetation Integrity)	Change in habitat condition	Area (ha)/Count (no. individuals)	Sensitivity to loss (Justification)	Sensitivity to gain (Justification)	BC Act Listing status	EPBC Act listing status	Potential SAIL	Species credits
<i>Austrostipa nullanulla / A spear-grass (Flora)</i>									
58_Mod	53.8	53.8	1.9	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	75
64_Mod	49.9	49.9	0.51	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	19
152_Mod	49.8	49.8	1.4	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	52

154_Mod	34.2	34.2	3.2	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	83
157_Mod	77.1	77.1	0.75	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	43
253_Mod	54.3	54.3	13.3	Geographic Distribution	Ability to colonise improved habitat	Endangered	Not Listed	True	542
								Subtotal	814
<i>Lophochroa leadbeateri / Pink Cockatoo (Fauna)</i>									
154_Mod	34.2	34.2	3.8	Biodiversity Conservation Act listing status	Species dependent on habitat attributes	Vulnerable	Endangered	False	65
170_Mod	26.1	26.1	0.54	Biodiversity Conservation Act listing status	Species dependent on habitat attributes	Vulnerable	Endangered	False	7
221_Mod	57.3	57.3	7.2	Biodiversity Conservation Act listing status	Species dependent on habitat attributes	Vulnerable	Endangered	False	207

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221_High	62.0	62.0	1	Biodiversity Conservation Act listing status	Species dependent on habitat attributes	Vulnerable	Endangered	False	31
								Subtotal	310