



Department of Planning and Environment

Jeffrey Peng
Senior Environmental Assessment Officer
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Department of Planning and Environment
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Our ref: DOC22/59623
Your ref: SSD-13855453

Dear Jeffrey,

Thank you for your email dated 14 December 2021 seeking advice from the Biodiversity, Conservation, and Science Directorate (BCS) of the Department of Planning and Environment regarding the Environmental Impact Statement, including a Biodiversity Development Assessment Report (BDAR) for the proposed Grenfell Poultry Farm.

BCS is satisfied that the BDAR adequately assesses the impacts of the development to biodiversity in accordance with the Biodiversity Assessment Method (BAM), noting a requirement to retire 24 ecosystem credits prior to commencement of work impacting on biodiversity values. BCS recommend that the requirement to retire the 24 ecosystem credits in accordance with s7.14(4) of the *Biodiversity Conservation Act 2016* be included in the project consent conditions, should the project be approved.

Attachment A includes some recommendations to assist in the development of associated management plans for the project, including but not limited to the Vegetation Management Plan.

If you have any questions about this advice, please contact Rowan Murphy, Senior Conservation Planning Officer, via rowan.murphy@environment.nsw.gov.au or on 0400 337 662.

Yours sincerely,

Samantha Wynn
Senior Team Leader Planning North West
Biodiversity, Conservation and Science Directorate

1 February 2022

Attachment A – BCS's Recommendations

BCS's recommendations

Grenfell Poultry Farm – Environmental Impact Statement

1. Environmental management actions should be auditable and enforceable

The Vegetation Management Plan (VMP) as referred to in Table 14 of the Biodiversity Development Assessment Report (BDAR) should assist operational staff to manage the identified threatened ecological communities (TECs) by providing a clear and concise environmental management framework that can be monitored internally and / or audited by external agencies.

The following recommendations aim to assist the proponent to produce management plans (including a Construction Environmental Management Plan) that are easy for operational staff to use and provide a clear, concise, and auditable environmental management framework.

Recommendations

1.1. Management actions should be presented in a tabulated format such as a Trigger, Action, Response Plan (TARP) with column headings addressing:

- An **environmental variable** known to affect the condition of the vegetation community. i.e., *Weed cover*.
- A specific and measurable **target range** is identified for each environmental variable. i.e., *Less than 5% total groundcover comprised of weed species*.
- An achievable **sampling strategy** or monitoring regime has been designed for each target. i.e., *Seasonal weed survey at each management zone*.
- A **trigger** (value outside of the target range) is established. i.e., *Weed species comprise greater than 10% total groundcover*.
- A realistic **management action** has been identified that is likely to place the variable back within the target range. i.e., *Spot application of herbicide in accordance with the weed control protocol*.
- **Responsibility** is assigned to a specific role(s) to carry out the sampling strategy, identify triggers, and commence the management action. i.e., *Environment Manager will carry out the sampling strategy and Environmental Officer will enact the weed control protocol*.
- A **time frame** is provided for the sampling strategy and management actions. i.e.,
 - Management zones will be surveyed for weeds four times a year, once each during summer, autumn, winter, and spring.
 - The weed control protocol will be implemented within one week (of appropriate weather) of a trigger being reported.

1.2. Environmental variables to be managed should include at a minimum the known threats to the Box-Gum Woodland CEEC. i.e.,

- Habitat loss; through long-term protection against development.
- Grazing pressure; including by over-abundant native species, livestock, and commercial apiaries.
- Degradation by pests; including weeds, and feral animals including predators and the Noisy Miner (*Manorina melanocapala*).
- Human impacts such as harvesting of firewood, removal of groundcover, unauthorised access, and application of fertiliser.
- Altered fire regimes.