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Dear Ms Allan

**Subject: Dendrobium mine modification – Gas Management Infrastructure Modification Report**

Thank you for referring the above matter to the Biodiversity and Conservation Division (BCD) of the Department of Planning and Environment (DPE). The development is for additional gas management infrastructure at the Dendrobium mine in a previously cleared area.

We have reviewed the Biodiversity Development Assessment Report (BDAR) and associated material and provide the following comments:

- The proponent has used the *Streamlined Assessment – Small area* module of the Biodiversity Assessment Method (BAM). Guidelines for applying this module are provided in Appendix C of the BAM. We support the use of the module in this case.
- The development will require the offsetting of biodiversity credits and this needs to be corrected in the BDAR. Section 4.1 states that “...*only impacts to TECs are required to be offset and given the PCT is not a TEC, no credits are required.*” This is incorrect and the development will need to offset the loss of the PCT regardless of its threatened status. Appendix C of the BAM refers to Sections 9 and 10 of the BAM which describes offset requirements for impacts, including non-threatened PCTs (9.2; 10.1.1, BAM 2020).
- Surveys were not done for two threatened orchids (*Caladenia tessellata* and *Genoplesium baueri*) listed as Serious and Irreversible Impact entities (SII) based on the habitat being degraded. Vegetation Integrity scores indicate that while the vegetation is regenerating, it is in relatively good condition. Additionally, these species can occur in areas of disturbance and therefore degraded habitat is not considered justification for excluding them from further assessment. These species must be surveyed at an appropriate time of year, or an Expert Report needs to be prepared, in accordance with Section 5.3 of the BAM.
- Littlejohn’s treefrog was recorded incidentally in the subject area in the vicinity of Sandy Creek. The BDAR found that the pools in Sandy Creek provide suitable breeding habitat however no vegetation or habitat disturbance would occur. The BDAR also stated that mitigation measures (Section 3.2.5) would ensure the proposed bridge works do not impact the species.

- The mitigation measures should also address hygiene protocols for working in areas where susceptible species such as Littlejohn's treefrog occurs:  
<https://www.environment.nsw.gov.au/research-and-publications/publications-search/hygiene-guidelines>
- It is essential these mitigation measures are implemented to protect the species, including adaptive management for any unexpected impacts that arise. If approval is to be granted, these mitigations measures should be referenced in the Conditions of Consent.
- Vegetation zones need to be accurately reflected within the BDAR. Figure 4 needs to reflect the BAM - Calculator assessment which indicates that 2 vegetation zones were assessed.

If you have any questions or require further advice, please do not hesitate to contact Vanessa Allen, Senior Conservation Planning Officer, South East, Biodiversity and Conservation via [Vanessa.Allen@environment.nsw.gov.au](mailto:Vanessa.Allen@environment.nsw.gov.au) or 4224 4186.

Yours sincerely



Michael Saxon  
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