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Your ref: SSI-22338205

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Dear Dr Mazaheri

**Subject: Kurri Kurri Lateral Pipeline Project (SSI-223382505) – Review of Environmental Impact Statement**

Thank you for your e-mail dated 8 April 2022 in which the Planning and Assessment (PA) of the Department of Planning and Environment (the Department) invited Biodiversity and Conservation Division (BCD) of the Department for advice in relation to the 'Kurri Kurri Lateral Pipeline Project (SSI-223382505); which is a linear project that occurs in the Cessnock City, Maitland City and Newcastle City local government areas.

BCD has reviewed the Environmental Impact Statement (EIS) including its appendices for this project in relation to site constraints including biodiversity and flooding. BCD identified no issues with the assessment of flooding and water quality for this stage of the project and notes that potential erosion and sedimentation, and acid sulphate soils may be issues during the construction stage, but further details on their management will be provided in the Construction Environmental Management Plan.

BCD's recommendations are provided in **Attachment A** and detailed comments are provided in **Attachment B**. The Biodiversity Assessment Method Calculator (BAM-C) file for this assessment will need to be re-run and the Biodiversity Development Assessment Report (BDAR) will need to be revised. BCD recommends that the proponent discuss the new BAM-C results with BCD prior to finalising the Response to Submissions Report.

If you require any further information regarding this matter, please contact Robert Gibson, Senior Regional Biodiversity Conservation Officer, via [huntercentralcoast@environment.nsw.gov.au](mailto:huntercentralcoast@environment.nsw.gov.au) or 02 4927 3154.

Yours sincerely

**STEVEN CRICK**  
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**Biodiversity and Conservation Division**

**13 May 2022**

Enclosure: Attachments A and B

## BCD's recommendations

### Kurri Kurri Lateral Pipeline Project (SSI-223380205) – Review of EIS

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#### BDAR assessment

1. BCD recommends that further information on threatened flora survey effort is provided that describes how BCD's threatened plant survey guidelines have been met for the species listed in this letter, particularly in relation to width of survey transect, the density of the vegetation, survey methodology, the extent of suitable habitat covered, and the dates of the surveys. It should be clarified if the dates given in Table A.2 mean that each survey type listed were done on every day in the date range.

Survey requirements from the Threatened Biodiversity Data Collection, where available, will also need to be followed. Further, if several different species were searched for along the same transect at the same time, then details are required of how many species were searched for and how they fall within Section 5.1 'Undertaking field traverses' in BCD's threatened flora survey guidelines (BCD, 2020). If BCD's survey guidelines have not been met, further survey may be required, or an Expert Report may be prepared. BCD notes that several plant species are currently assumed to be present, and that further surveys are planned. Those surveys will need to meet BCD's survey requirements or those species will need to remain assumed present or be covered by an Expert Report.

2. BCD recommends that the section on threatened fauna survey effort is revised, with further details provided about how much the survey meets BCD's survey requirements.
3. BCD recommends the further information is provided that explains how the initial list of predicted threatened species for the project area was reduced to the number considered in the BAM assessment.
4. BCD recommends that an assessment of SAIL impacts for the swift parrot is provided.
5. BCD recommends that the BAM-C assessment is re-run as a linear-type assessment for the pipeline component of the project to be consistent with the BAM.
6. BCD recommends the accredited assessor updates then finalises the BAM-C file and submits the file to the NSW Biodiversity Accredited Assessor System (BAAS) prior to the submission of the Response to Submissions Report.
7. BCD recommends the further information is provided that explains how the species polygons were developed for this assessment.
8. BCD recommends the accredited assessor updates Figure 2.1 'Survey Effort' so that it shows when targeted survey transects were conducted, where stag watching was conducted, and labels each of the vegetation plots.
9. BCD recommends the accredited assessor provides copies of the plot field data sheets of the vegetation quadrats used for this assessment.

10. BCD recommends the accredited assessor provides the GIS shapefiles used for maps in the BDAR.
11. The construction and operational footprints for the project must be clearly defined.
12. BCD recommends that the subject land is defined and further information is provided about the landscape context to meet requirements of the BAM.
13. BCD recommends that the assessment of native vegetation cover is revised to meet Section 3.2 of the BAM and that both woody and non-woody components are described.
14. BCD recommends that the revised BDAR includes an assessment of existing information of native vegetation on the subject land assessment and assessment area to meet requirements of the BAM.
15. BCD recommends that information about additional landscape features, as described in the SEARs, are provided in the BDAR.
16. BCD recommends that existing maps are revised, or new maps are prepared that show all features required by the BAM.
17. BCD recommends that existing tables are revised, or new tables are prepared that provide all of the information required by the BAM.
18. BCD recommends that information is provided about the frequency, duration and timing of indirect impacts from the project, and which threatened communities or species may be affected.
19. BCD recommends that details of mitigation measures for prescribed impacts are provided so as to meet the requirements of the BAM.
20. BCD recommends that details of proposed adaptive management strategies are provided.
21. BCD recommends that Figure 1.2 and 1.3 are redrawn at no more than 1:10,000 scale and that all maps from the BDAR are provided as jpeg files. Both actions would meet BAM requirements.
22. BCD recommends that edits are made to Appendices C and D

## **Matters of National Environmental Significance**

23. BCD recommends that further information is provided about likely impacts on Matters of National Environmental Significance to enable BCD to undertake the Bilateral Assessment.

## BCD's detailed comments

# Kurri Kurri Lateral Pipeline Project (SSI-223380205) – Review of EIS

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## BDAR assessment

### 1. Further details are required of survey effort for 34 threatened plants

The BDAR does not provide enough detail about how the targeted survey effort for 34 threatened plant species meets BCD's threatened plant survey guidelines (Surveying threatened plants and their habitats: NSW survey guide for the Biodiversity Assessment Method', April 2020). Section 2.1 'Targeted threatened species surveys' of the BDAR provides a summary of threatened species surveys for the project. Appendix A 'Methods' of the BDAR provides a summary of targeted survey methodology and Section A1.2.3 'Targeted threatened species searches' states that parallel transects 10 to 20 metres apart were used to search for threatened plant. No details are provided of the density of the groundcover, how much of the potentially suitable habitat was covered, or how species with small growth forms that require more closely-spaced transects were covered. Section A1.2.4 states that meandering transects were also used, which will fill some gaps between transect survey lines. Section 2 states that 1.14 hectares of the project area was not assessable, and thus on-ground surveys were not possible of that land.

Ten to twenty metre spaced transects do not meet BCD's flora survey guidelines (EES, 2020) for several potentially occurring threatened plants, where dense vegetation was present. The information presented in the BDAR does not show that all potential suitable habitat was surveyed. Also, where further surveys are planned, it is not clear how much of the project area has been adequately surveyed for those species. Thus, further details of threatened plant surveys are required as follows:

Trees, mallee trees and tall shrubs (6 metres) – BCD survey requirements are for transects up to 40 metres apart in open vegetation or up to 20 metres apart in dense vegetation. However, details of survey effort in areas of suitable habitat, and how they meet BCD survey guidelines are required for the following species:

- *Acacia pendula*
- *Angophora inopina*
- *Eucalyptus camaldulensis*
- *Eucalyptus castrensis*
- *Eucalyptus glaucina*
- *Eucalyptus parramattensis* subsp. *decadens*
- *Eucalyptus pumila*
- *Melaleuca biconvexa*
- *Melaleuca groveana*

- *Rhodamnia rubescens*
- *Rhodomyrtus psidioides*

Medium shrubs (1-6 metres) – BCD survey requirements are for transects up to 20 metres apart in open vegetation, or up to 10 metres apart in dense vegetation. However, details of transect spacing and vegetation density are required. Transects less than 20 metres apart are too far apart in any areas of dense vegetation for the following species

- *Callistemon linearifolius*
- *Grevillea parviflora* ssp. *parviflora*
- *Ozothamnus tessellatus*
- *Persoonia pauciflora*
- *Pomaderris queenslandica*
- *Prostanthera cineolifera*
- *Tetratheca juncea*

Subshrubs – BCD survey requirements are for transects up to 15 metres apart in open vegetation or up to 10 metres apart in dense vegetation. However, details of survey effort, and how it covers all areas of suitable habitat are required for:

- *Acacia bynoeana*

Herbs and forbs – BCD survey requirements are for transects up to 10 metres apart in open vegetation or up to 5 metres apart in dense vegetation. However, transects already undertaken are too far apart. Details of survey effort undertaken in areas of suitable habitat and how much survey work is required is needed for the following species:

- *Asperula asthenes*
- *Monotaxis macrophylla*
- *Persicaria elatior*
- *Rutidosia heterogama*
- *Thesium australe*

Orchids, epiphytes, climbers and aquatic herbs – BCD survey requirements are for transects up to 10 metres apart in open vegetation or up to 5 metres apart in dense vegetation. However, transects already undertaken are too far apart. Details of survey effort undertaken in areas of suitable habitat and how much survey work is required is needed for the following species:

- *Corybas dowlingii*
- *Cryptostylis hunteriana*
- *Cynanchum elegans*
- *Cymbidium canaliculatum*

- *Diuris pedunculata*
- *Diuris tricolor*
- *Maundia triglochinos*
- *Prasophyllum petilum*
- *Pterostylis chaetophora*
- *Pterostylis gibbosa*
- *Zanichellia palustris*

### Recommendation 1

BCD recommends that further information on threatened flora survey effort is provided that describes how BCD's threatened plant survey guidelines have been met for the species listed in this letter, particularly in relation to width of survey transect, the density of the vegetation, survey methodology, the extent of suitable habitat covered, and the dates of the surveys. It should be clarified if the dates given in Table A.2 mean that each survey type listed were done on every day in the date range.

Survey requirements from the Threatened Biodiversity Data Collection, where available, will also need to be followed. Further, if several different species were searched for along the same transect at the same time, then details are required of how many species were searched for and how they fall within Section 5.1 'Undertaking field traverses' in BCD's threatened flora survey guidelines (BCD, 2020). If BCD's survey guidelines have not been met, further survey may be required, or an Expert Report may be prepared. BCD notes that several plant species are currently assumed to be present, and that further surveys are planned. Those surveys will need to meet BCD's survey requirements or those species will need to remain assumed present or be covered by an Expert Report.

## 2. Clarification of fauna survey effort and results is required in the BDAR

The BDAR does not demonstrate how the targeted survey effort for 39 threatened fauna species meets BCD's threatened fauna survey guidelines. Section A1 'Methods' of the BDAR summarises the targeted fauna surveys done for the project, but it does not specify what the survey requirements are for each species (such as the minimum number of hours, nights or days of survey), number of people who did the survey, or whether additional survey requirements apply from the TBDC. BCD recommends that the information about threatened fauna survey is revised and presented as per Chapter 5 'Habitat suitability for threatened species' in the *Guidance for the Biodiversity Development Assessment Report Template* (EES, April 2022). This can include new survey data for the (then) proposed new surveys for species-credit species proposed in Appendix C of the BDAR. New surveys were planned for the wallum froglet, green and golden bell frog, green thighed frog, brush-tailed phascogale and the southern myotis.

### Recommendation 2

BCD recommends that the section on threatened fauna survey effort is revised, with further details provided about how much the survey meets BCD's survey requirements.

## 3. The process of species selection for survey requires more information

The BDAR does not clearly outline how the steps from predicted species, to candidate species, to those selected for targeted survey were taken. This does not meet the requirements of Sections 5.1 and 5.2, or Appendix K of the BAM. For example, BAM-C reports of predicted species and candidate species are not provided. Ecosystem credit species and species credit

species additional to the BAM-C lists are not clearly identified. Data and justification for including or excluding species are too brief.

### Recommendation 3

BCD recommends the further information is provided that explains how the initial list of predicted threatened species for the project area was reduced to the number considered in the BAM assessment.

## 4. An assessment is required of SAIL impacts for the swift parrot

The swift parrot is a candidate species for serious and irreversible impacts (SAIL) as per Section 9.1 of the BAM. Where mapped 'important habitat' of this species occurs in the development footprint occurs then this triggers an assessment of SAIL. Section 4.0 'Avoidance and Minimisation of Impacts' in the BDAR states that a small amount of 'Important Area' mapped for the swift parrot will be impacted. However, it also states that the mapped area was the former carpark for the Kurri Kurri aluminium smelter and that it has been incorrectly mapped. An assessment of SAIL impacts for the swift parrot, as per Section 9.1.2 is still required.

### Recommendation 4

BCD recommends that an assessment of SAIL impacts for the swift parrot is provided.

## 5. The pipeline component of the BAM-C needs to be re-run as a linear assessment

As described in Table 1.1 'Development Footprint Location in the Landscape' in the BDAR, the BAM-C assessment of this project was run as a site-based assessment in which all components had a 1500-metre-wide buffer applied. No reason for this was given. According to Section 3.1.2 of the BAM 2020, the pipeline component, and should be run as a linear assessment type with a 500-metre-wide buffer applied to the centre line. BCD recommends that the pipeline component of the project is reassessed with the BAM-C set to a linear based assessment, to be consistent with the BAM.

### Recommendation 5

BCD recommends that the BAM-C assessment is re-run as a linear-type assessment for the pipeline component of the project to be consistent with the BAM.

## 6. The Accredited Assessor should update, finalise and re-submit the credit calculator via the NSW BAAS prior to finalising the Response to Submissions Report

The proponent intends to update the BAM-C file in response to new targeted surveys that are discussed in the table of predicted species-credit species (Appendix C) in the BDAR. BCD also recommends changes to the BAM-C based on this review. These changes may change the credit obligation to be offset. Therefore, BCD recommends that the proponent updates the BAM-C with new data, finalises the file, and submits it to the Biodiversity Accredited Assessor System (BAAS). BCD will then be able to access and review the BAM-C file. BCD recommends that this is done prior to finalising the Response to Submissions Report.

### Recommendation 6

BCD recommends the accredited assessor updates then finalises the BAM-C file and submits the file to the NSW Biodiversity Accredited Assessor System (BAAS) prior to the submission of Response to Submissions Report.

## 7. Further details are required of the species polygons in the assessment

The BDAR does not clearly describe the process of the generation of species polygons in the assessment. BCD recommends that the unit of measure is given for all species covered by species polygons, that all species measured by species polygons are shown, and the features used to map the polygons, including the TBDC are described.

### Recommendation 7

BCD recommends the further information is provided that explains how the species polygons were developed for this assessment.

## 8. Revise the map of survey effort in the BDAR

Figure 2.1 'Survey Effort' in the BDAR does not clearly show all information related to survey effort. BCD recommends that the map is revised to show the following:

- give the dates for the survey tracks
- show the location of stag watching surveys, and
- label plots with plot number.

### Recommendation 8

BCD recommends the accredited assessor updates Figure 2.1 'Survey Effort' so that it shows when targeted survey transects were conducted, where stag watching was conducted, and labels each of the vegetation plots.

## 9. Copies of plot field data sheets should be provided

The plot field data sheets have not been included in the BDAR. BCD understands that copies of the field sheets have been uploaded with the BAM-C file in BAAS. However, as the BAM-C file is unfinished and thus not accessible to BCD, BCD are unable to access copies of the plot field data sheets. Providing field data sheets is a requirement under the BAM (2020, see Appendix K). BCD reviews the plot field data sheets to ensure consistency between the data sheets, the BDAR and the credit calculator.

### Recommendation 9

BCD recommends the accredited assessor provides copies of the plot field data sheets of the vegetation quadrats used for this assessment

## 10. Copies of GIS shapefiles should be provided

BCD have been unable to access GIS shapefiles for the project. BCD understands that copies of the GIS shapefiles have been uploaded with the BAM-C file in BAAS. However, as the BAM-C file is unfinished and thus not accessible to BCD, BCD are unable to access the GIS shapefiles. Providing GIS shapefiles is a requirement under the BAM (2020, see Appendix K).

### Recommendation 10

BCD recommends the accredited assessor provides the GIS shapefiles used for maps in the BDAR.

## 11. Details are required of the construction footprint versus the operational footprint of the project

The BDAR does not clearly describe the operational footprint of the project or identify temporary features. For example, what is the planned fate of the pipe laydown yards? Access tracks? Truck turnarounds? How long will these features be used? How are temporary/ancillary works defined? Where native vegetation is cleared for temporary infrastructure, will the land be revegetated to the same PCT? This type of information is required to meet Chapters 2 and 3 of the BAM.

### Recommendation 11

The construction and operational footprints for the project must be clearly defined.

## 12. More information is required of the general description of the subject land

The BDAR does not include all of the required information about the subject land. The subject land for the project is not defined. A general description of the subject land is also required, that gives the topographic and hydrological setting and details of the geology and the soils. This would meet the requirements set out in Table 24 (page 116) of the BAM.

### Recommendation 12

BCD recommends that the subject land is defined and further information is provided about the landscape context to meet requirements of the BAM.

## 13. The native vegetation extent for the project requires clarification

Table 3.1 'Landscape Features in the Development Footprint' in the BDAR gives the native vegetation extent within the assessment area as 50% and states that this is 'predominantly comprised of woodland areas in various conditions from regrowth to intact'. It is unclear if non-woody vegetation has been included in the assessment of native vegetation extent. Further, the mix of woody and non-woody native vegetation may change when the BAM-C for the pipeline is re-run as a linear-based project. The revised BDAR will require further information to meet the requirements of Section 3.2 'Assess native vegetation cover' in the BAM.

### Recommendation 13

BCD recommends that the assessment of native vegetation cover is revised to meet Section 3.2 of the BAM and that both woody and non-woody components are described.

## 14. A review of existing information on native vegetation is required

Section 3.2 'Native Vegetation within the Development Footprint' in the BDAR does not include a review of existing information on native vegetation on or adjacent to the assessment area. For example, the *Vegetation of the Cessnock-Kurri Region: Survey, Classification & Mapping, Cessnock LGA, New South Wales* by Bell and Driscoll (2008), or vegetation assessments on the Donaldson Coal Mine, or the Hunter Power Project. This information would meet the requirements of Appendix K of the BAM.

### Recommendation 14

BCD recommends that the revised BDAR includes an assessment of existing information of native vegetation on the subject land assessment and assessment area to meet requirements of the BAM.

## 15. Information on additional landscape features from the SEARs is required

The Secretary's Environmental Assessment Requirements (SEARs) (on page 16) identifies additional landscape features to be described in the BDAR: Landscape health of rivers & floodplains (nutrient flow, aquatic connectivity, habitat for spawning and refuge – river benches). However, that information does not appear to have been provided in the BDAR. BCD recommends that if the information has been provided in the EIS that its location is given. If the information has not yet been provided, then BCD recommends that it is included in the revised BDAR.

### Recommendation 15

BCD recommends that information about additional landscape features, as described in the SEARs, are provided in the BDAR.

## 16. Additional features are required to be shown on maps

The BDAR does not fully meet the requirements of the BAM with respect to features not shown on maps. These requirements are described in Appendix K of the BAM. BCD recommends that either existing maps are revised, or new maps are produced (and shapefiles) with the following features:

- The final footprint
- Temporary / ancillary works
- The subject land
- The buffer applied to the subject land
- Wetlands and important wetlands
- Locations of known or potential acid sulfate soils
- Direct and Indirect impact zones
- Prescribed impact locations
- The extent of threatened ecological communities at risk of SAI
- The location of threatened species at risk of SAI
- Areas not requiring BAM assessment

### [Recommendation 16](#)

BCD recommends that existing maps are revised, or new maps are prepared that show all features required by the BAM.

## 17. Additional information is required to be presented in Tables in the BDAR

The BDAR does not fully meet the requirements of the BAM with respect to information presented in Tables. These requirements are described in Appendix K of the BAM. BCD recommends that either existing tables are revised, or new tables are produced with the following information:

- The biodiversity risk weighting for all species-credit species
- Threatened entities that may be dependent upon, or may use habitat features associated with any of the prescribed impacts
- Measures to mitigate and manage impacts – with details of action, outcome, timing and responsibility (perhaps revise Table 9.1?)
- Credit class and matching credit profile

### [Recommendation 17](#)

BCD recommends that existing tables are revised, or new tables are prepared that provide all of the information required by the BAM.

## 18. More details are required about indirect impacts

Section 5.1.2 'Indirect Impacts' requires further information to meet the requirements of Section 8.2 of the BAM. Specifically, details are required on the frequency, duration and timing of indirect impacts. Identify any threatened ecological communities or threatened species likely to be affected by indirect impacts.

### [Recommendation 18](#)

BCD recommends that information is provided about the frequency, duration and timing of indirect impacts from the project, and which threatened communities or species may be affected.

19. Mitigation measures for prescribed impacts on biodiversity are required

Mitigation measures for prescribed impacts have not been provided. Section 5.2 'Prescribed Impacts' of the BDAR describes likely prescribed impacts to biodiversity by the project but does not include any mitigation measures. This information is required to meet the requirements of Section 8.4.2 of the BAM.

[Recommendation 19](#)

BCD recommends that details of mitigation measures for prescribed impacts are provided so as to meet the requirements of the BAM.

20. Details of adaptive management strategies to mitigate and manage impacts on biodiversity values are required

The BDAR does not describe adaptive management strategies to mitigate and manage impacts on biodiversity values. This is required to meet Section 8.4.0.2 of the BAM (page 37).

[Recommendation 20](#)

BCD recommends that details of proposed adaptive management strategies are provided.

21. Maps need to be presented at the appropriate scale and also as jpeg files

Figure 1.2 'Development Footprint' and Figure 1.3 A-H 'Landscape Features' are not presented at the correct scale in the BDAR. Figure 1.2 is presented at 1:62,500 (at A4) and Figure 1.3 at 1:18,000 (at A4). To meet the requirement of the BAM both figures would need to be presented at no more than 1:10,000 scale. Further, Appendix K of the BAM states that all maps from the BDAR are required to be provided as separate jpeg files.

[Recommendation 21](#)

BCD recommends that Figure 1.2 and 1.3 are redrawn at no more than 1:10,000 scale and that all maps from the BDAR are provided as jpeg files. Both actions would meet BAM requirements.

22. Data in Appendix C and Appendix D is transposed

The data in Appendix C 'Predicted Threatened Species' and Appendix D 'Vegetation Integrity Data' is transposed in the current version of the BDAR. Further, the vegetation integrity data for plots Q28 and Q29 appears to have the function data out of alignment.

[Recommendation 22](#)

BCD recommends that edits are made to Appendices C and D.

## Matters of National Environmental Significance

23. Additional information is required for the assessment of MNES

The Matters of National Environmental Significant (MNES) assessment for the project requires further information to enable BCD to undertake the Bilateral Assessment on behalf of the Commonwealth Department of Water and the Environment (DAWE). The MNES assessment is contained in Appendix 15 'Kurri Kurri Lateral Pipeline Project: Assessment of Commonwealth Matters' by Umwelt (Australia) Pty Limited (Dated 9 March 2022). The MNES assessment draws heavily on the BDAR, discussed above, and many of the same matters identified for the state assessment of biodiversity also apply to the MNES assessment.

In order for BCD to complete its assessment of MNES, BCD recommends that the following information is provided:

[Background and Description of Action](#)

- The MNES report refers to the BDAR to describe the action in relation to MNES. The BDAR covers impacts to all vegetation types and both NSW and Commonwealth-listed species and makes it difficult to understand the project in relation to MNES. BCD recommends that the operational and construction footprints of the project are described in relation to impacts to MNES.
- More details are required on the staging and timing of the project and its impacts on MNES. This is particularly so for any temporarily cleared areas (e.g., tracks, pipe laydown areas, the turkey nest dam, truck turnaround bays, underground boring locations etc)

#### Landscape Context of MNES

- Further details are required, as per the BDAR assessment (above)

#### EPBC Act Listed Threatened Species & Communities

- New maps are required that show only MNES entities – they are not clearly shown in the maps in the BDAR
- Survey requirements for MNES entities must be spelt out, including any DAWE survey requirements, and species-specific survey requirements in the Threatened Species Data Collection. This will enable survey effort to be measured against survey requirements
- Demonstrate the process of identifying areas of Plant Community Type (PCT) 1594 'Cabbage gum – Rough-barked apple grassy woodland on alluvial floodplains of the lower Hunter' that meet the definition of the Commonwealth listed 'River-flat Eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria Critically Endangered Ecological Community' (as briefly discussed in Section 2.1.1 of the MNES report). Demonstrate how the condition class assessment for vegetation identified as this CEEC was done (as indicated on page A-3 of the MNES report).

#### Avoidance, Minimisation, Mitigation & Management

- A discussion of prescribed impacts on MNES is required.

#### Impact Assessment

- The BAM-C has not yet been finalised, and so the final credit obligation to be offset has not yet been finalised. The BAM-C will need to be re-run to include the results of recent targeted surveys, and to consider advice in this letter.
- Further details are required of the type, timing and location proposed rehabilitation of MNES impacted by temporary clearing.

#### Other Considerations

- Demonstration of how Approved Conservation Advice, Listing Advice and Threat Abatement Plans have been considered for this assessment, including proposed actions for each MNES entity.

#### [Recommendation 23](#)

BCD recommends that further information is provided about likely impacts on Matters of National Environmental Significance to enable BCD to undertake the Bilateral Assessment.