

EcoResolve



Environment & Design

Response to Submissions – Cooranbong Stockpile Extension Centennial Coal Company Ltd



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1 Introduction

EcoResolve was engaged by Centennial Coal Company Ltd to undertake a response to submissions report for the Mod 4 - Cooranbong Coal Stockpile Extension (SSD-5145-Mod-4) associated with the Northern Coal Services Project (hereafter referred to as the 'Project'). The Project is associated with mining activities at Newstan Colliery, 100 Miller Rd, Fassifern 2278.

The Conservation Programs, Heritage & Regulation Group (CPHR) of the NSW Department of Climate Change Environment Energy and Water (DCCEE) provided comments and recommendations on the Submission Report within a letter dated 20 November 2025. EcoResolve has thoroughly reviewed the CPHR comments and recommendations and provides responses within this report to Items 1 to 15 of Attachment 1 of the CPHR 20 November 2025 letter.

2 Study Area

The Project is associated with the proposed modification Centennial is seeking for the Cooranbong Entry Site Coal Stockpile Extension (Northern Coal Services Project: SSD-5145 Modification 4). The Project area totals 2.93 ha (**Figure 1**).

3 Biodiversity Response to Submissions Summary

This response addresses comments and recommendations from CPHR (**Table 1**) between current and desired outcomes associated with the existing Streamline Biodiversity Assessment Report (SBDAR) (EcoResolve, 2025). Summaries of comments are summarised below and EcoResolve's recommendations for addressing are detailed in **Table 1**.

3.1 Required updates for completion

The following biodiversity related items are required for completion:

- The modification application does not meet the minimum requirements of the BAM 2020
- Inadequate avoidance and minimisation of Biodiversity issues
- Incomplete SAI assessment for Swift Parrot
- Further information is required to assess SAI risks to some species.
- BDAR not valid in accordance with the BAM and BC Act
- PCT determination does not meet the minimum requirements of the BAM 2020
- TEC determination does not meet the minimum requirements of the BAM 2020
- The BDAR does not meet the requirements of BAM 2020 Stage 1
- The BDAR does not meet the requirements of the BAM 2020 as set out in BAM Operational Manual – Stage 1.
- Spatial data supplied does meet the requirements of BAM 2020.
- Targeted flora and fauna searches have not been completed in accordance with the BAM, Threatened Biodiversity Database Collection (TBDC) and relevant survey guidelines
- Further assessment and survey requirements for Masked Owl
- The BDAR does not meet the requirements of BAM 2020 Stage 2
- Prescribed impacts have not been adequately assessed

Table 1 – Conservation Programs, Heritage & Regulation Group (CPHR) issues and proposed responses

Issue verbatim	Issue summary	Issue category	Accountability	Centennial Responsibility	Consultant scope (EcoResolve)	Response to Submissions (EcoResolve)
1. The modification application does not meet the minimum requirements of the BAM 2020 In accordance with the BC Act and DCCEEW’s website, the BDAR must be prepared in accordance with the requirements for modifications. To achieve this the BDAR must: - Outline available information about the original impact of the development and consider any measures already taken to avoid, minimise or offset the impact on biodiversity values in connection with the previous approval before the proposed modification - Identify those offset obligations that have been discharged with documentary evidence - Identify new offset requirements and any new measures to avoid and minimise impacts in accordance with the BAM. The establishment of the Offset Area to meet the previous approval is an important element to support the current application and its proposed impacts. Without evidence of this it is unclear how impacts to threatened species can be justified and supported.	Recommended action: - Update the BDAR to include the minimum information requirements for modifications outlined above. - Detail how offset obligations (consent condition 19) have been met and provide evidence that the biodiversity offset areas have been established and are protected by appropriate conservation mechanisms.	S-BDAR	EcoResolve		Where required EcoResolve to update, review resubmit the S-BDAR so it meets the requirements of Section 4.2 of the Biodiversity Assessment Method (BAM) 2020 Operations Manual - Stage 1 (2022).	Information regarding the offset requirements of SSD5145 and its modifications has been added to Section 1.2. Because the disturbance associated with these works has not yet occurred, the compensatory measures have not yet been fully planned, implemented or completed. Plans to fulfil these requirements are documented in Northern Coal Services Biodiversity Management Plan which includes a Biodiversity Offsets Strategy.
2. Inadequate avoidance and minimisation of Biodiversity issues The BDAR does not adequately address the avoid, minimise and offset hierarchy as per section 6.3A of the Biodiversity Conservation Act 2016 (BC Act). The BDAR does not identify how the significant findings of the Stage 1 BAM Assessment have informed the avoid and minimise strategy and led to impacts to biodiversity being avoided. The assessor should document the analysis and evolution of the avoid and minimise options in the BDAR (see Section 3.3 of the BAM (2020) Stage 2) to provide transparency and support decision making. The assessor needs to demonstrate how reasonable avoid and minimise measures have been genuinely and robustly explored, including an evaluation of feasible alternatives, spatial identification of areas avoided, and supporting analyses, data, and justifications for the decisions made. The BDAR lacks any substantive analysis or documentation addressing how impacts have been avoided or minimised in accordance with the BAM. Given the significant impacts to threatened species and threatened species habitat, it is strongly recommended that alternative technologies, processing methodologies, and alternative areas are explored for the stockpile expansion. A refinement in disturbance area is mentioned in the BDAR but this should be further discussed, documented and clearly mapped, as part of Stage 2 of the BAM, demonstrating that alternate locations, technologies or processing methodologies have been considered. The BDAR also needs to document how the findings of Stage 1 BAM Assessment have informed the avoid and minimise strategy. CPHR requests further avoidance of impacts to: - Threatened species (<i>Grevillea parviflora</i> subsp. <i>parviflora</i> and <i>Tetratheca juncea</i>) - Habitat features such as hollow bearing trees used by Squirrel Gliders and possibly Masked Owls and Glossy Black-Cockatoo’s. Loss of hollow bearing trees is a key threatening process. CPHR considers the loss of this high value threatened species habitat to be unacceptable given the rates of habitat loss and extinction in NSW, and the inadequate avoid and minimise strategy presented in the BDAR.	Recommended action: - CPHR recommends that alternate locations, technologies or processing methodologies are considered and genuinely explored in the BDAR to avoid impacting this area of high biodiversity value. - CPHR recommends further avoidance, with demonstration of how biodiversity constraints have informed design of the proposal. - The assessor is required to clearly present evidence of avoiding or minimising impacts on biodiversity values in accordance with Chapter 3 of Biodiversity Assessment Method 2020 Operational Manual – Stage 2. - CPHR recommends refinement of project footprint, to avoid high value biodiversity (i.e. large hollow bearing tree (HBT)s) and thereby updates to the BDAR, BAM-C and spatial package are required as appropriate.	S-BDAR	EcoResolve			We appreciate that the proposed modification has impacts to threatened species and their habitats. As described in Section 5.1, the subject land has been reduced substantially through two revisions, reducing loss of native vegetation from ~9.5 ha down to ~2.93 ha. Direct impacts to aquatic habitat have been eliminated from the proposal as well. While 2.93 ha of woodland will still be directly impacted, further reductions to the footprint of the proposed modification would negatively affect the planned future operational capabilities of the CES. We believe that a reasonable compromise has been reached between the avoidance and minimisation of direct impacts and the operational needs of the CES.

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3. Incomplete SAII assessment for Swift Parrot The species is a dual credit species, assessed for species credits (important habitat map) and ecosystem credits (all other areas the species is likely to occur). No survey is required if the subject land is on an important habitat map for a species unless the species profile in the TBDC states otherwise. The species is considered present and the part of the subject land that is within the important habitat map forms the species polygon used to generate species credits (BAM section 5.2.5 Box 2). Any remaining habitat on the subject land, e.g. unmapped locations used by these species is assessed for ecosystem credits. The area mapped as important habitat for Swift Parrot within the project area is identified as potential SAII. The proponent needs to undertake a full SAII assessment for this species in accordance with section 9.1 of BAM. This assessment in the BDAR is currently not adequate.	Recommended action: Undertake a full SAII assessment for this species in accordance with section 9.1 of BAM	S-BDAR	EcoResolve		Complete full SAII assessment	A full SAII has been completed and added to the S-BDAR (Section 5.4, Table 11. SAII Assessment for the Swift Parrot (<i>Lathamus discolor</i>)).
4. Further information is required to assess SAII risks to some species. CPHR considers that SAII cannot be ruled out for the following species, as the accredited assessor has not completed surveys in accordance with the Threatened Biodiversity Data Collection (TBDC) or relevant guidelines to confidently conclude that these species are absent from the site: • Corunastylis insignis Syn. Genoplesium insigne (SAII) • Corunastylis sp. Charmhaven Syn. Genoplesium branwhiteorum (SAII) • Rhizanthella slateri (SAII) • Thelymitra adorata (SAII) • Stuttering Frog (Mixophyes balbus) (SAII) • Eastern Cave-bat (Vespadelus troughtoni) Note: Eastern Cave Cat (Vespadelus troughtoni) cannot be confidently discounted from the site, given other Vespadelus species were recorded through ultrasonic bat surveys. There are overlapping call characteristics between Vespadelus troughtoni and other Vespadelus sp.; identifying it to species level is not possible through ultrasonic bat surveys, therefore further survey is required, or the proponent can obtain an expert report or assume presence of this species. The following SAII species were recorded on site: • Large Bent-winged Bat (Miniopterus orianae oceanensis) • Little Bent-winged Bat (Miniopterus australis) Further assessment is required to confirm the presence or absence of breeding habitat within the proposed site and within a 100 m radius of the site. Please review potential breeding habitat for this species listed in the TBDC. The current assessment is deemed inadequate by CPHR and not in accordance with BAM and TBDC. All potential breeding habitat needs to be mapped in accordance with The Species credit threatened bats and their habitats – NSW guide for the Biodiversity Assessment Method. If impacts to breeding habitat are predicted or assumed for any of the microbat species, then a SAII assessment should be prepared.	Recommended action: • Undertake surveys in accordance with the BAM, provide a report from a species expert, or assume presence for relevant species • Prepare SAII assessments for species if presence is assumed, or if impacts to breeding habitat are predicted for microbat species. • Reflect all amendments to species polygons within the BDAR and BAM-C.	Fieldwork S-BDAR	EcoResolve		Orchid expert to do report for <i>C.insigne</i> , <i>C. charmhaven</i> , and <i>T.adorata</i>	• <i>C. insignis</i> – orchid expert report resulted in the species being unlikely to occur. See Section 4.2 ‘Expert Report’ and Appendix H for details. • <i>C. sp. Charmhaven</i> – orchid expert report resulted in the species being unlikely to occur. See Section 4.2 ‘Expert Report’ and Appendix H for details. • <i>T. adorata</i> – orchid expert report resulted in the species being unlikely to occur. See Section 4.2 ‘Expert Report’ and Appendix H for details. • <i>R. slateri</i> – It is not a requirement to check a reference population on the TBDC. The TBDC states for the survey effort that: <i>Use buds, flowers and/or fruit to identify to species</i>. Furthermore, there is no listed expert for this species, and the BOS Help Centre does not have this species listed in the NSW Orchid Flowering Lookup. EcoResolve has been unable to locate a reference site for this species, and the survey timing is listed as being October to November on the TBDC with the EcoResolve surveys being conducted in the middle of this period (11-12/10/2023) being considered suitable in the context of the guidelines and available information. • Stuttering Frog (<i>M. balbus</i>) – four more nights of aural-visual surveys have been completed (06-08/01/2026 & 27/01/2026) in accordance with survey requirements for this species (added to BDAR and in spatial files). No evidence of the species presence was recorded during these surveys (not sightings or calls). • Eastern Cave-bat (<i>V. troughtoni</i>) – Bat breeding habitat searches were conducted within a 200m radius of the site (07-08/01/2026) to confirm the presence/absence of breeding habitat. No actual colonies were recorded, and no breeding habitat was identified. • Large Bent-winged Bat (<i>M. orianae oceanensis</i>) - Bat breeding habitat searches were conducted within a 200m radius of the site (07-08/01/2026) to confirm the presence/absence of breeding habitat. No actual colonies were recorded, and no breeding habitat was identified.

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						Little Bent-winged Bat (<i>M. australis</i>) - Bat breeding habitat searches were conducted within a 200m radius of the site (07-08/01/2026) to confirm the presence/absence of breeding habitat. No actual colonies were recorded, and no breeding habitat was identified
5. BDAR not valid in accordance with the BAM and BC Act The BAM-C biodiversity credit report attached to the BDAR was finalised on 14 July 2025 (Appendix E). The BAM-C must be finalised within 14 days of the submission to comply with the certification requirements under the BC Act to ensure that the assessment is based on data that is current.	Recommended action - Revise the BDAR and BAM-C to meet the requirements of the BAM and comply with the certification requirements under the BC Act. submit a certified BDAR within 14 days of the date that the credit report being finalised to be considered valid and attached updated report to revised BDAR. - submit all digital data associated with a BDAR to the decision-maker (see Appendix K BAM 2020).	S-BDAR	EcoResolve			The requirement to meet this timeframe for submission has been met.
6. PCT determination does not meet the minimum requirements of the BAM 2020 The BDAR does not provide adequate justification for the PCT determination (or for areas that cannot be assigned to a PCT) within the subject site. The statement “The vegetation community present and considered to be the best fit for the vegetation on site was identified as PCT 3583, Hunter Coast Lowland Scribbly Gum Forest” in the BDAR is not deemed adequate. PCT determination needs to be supported by evidence-based justification and process needs to be clearly documented with the BDAR, including a short list of other PCTs considered, in accordance with the BAM Section 4.2. Failure to justify PCT selection with the support of quantitative and qualitative data in the BDAR is a failure to comply with the requirements of the BAM.	Recommended action: Revise the BDAR to detail PCT identification within the subject site and include reference (but not limited) to: - Plot survey data - Describe the process for identifying and refining PCTS, including a shortlist - Quantitative and qualitative analysis of survey data - Use of PCT identification tools, such as Plot to PCT, - Abiotic and biotic factors that contribute to PCT justification - Alignment of plot data with PCTS in BioNet. - Adequate justification of areas that cannot be assigned a PCT. - Extent and Timing	S-BDAR	EcoResolve			A detailed justification of PCT assignment has been added (Section 3.2.1). The justification primarily relies on comparison of site floristics survey data and relative abundance data from the PCT descriptions to support selection between the three most likely PCTs.

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7. TEC determination does not meet the minimum requirements of the BAM 2020 The BDAR does not provide adequate justification of TEC determination. The statement “This PCT is not considered to form part of any BC Act or EPBC Act listed EECs” in the BDAR is deemed adequate. The BDAR should include a comparison of the PCT description, plot floristics and other site attributes to relevant NSW Threatened Species Committee Final Determinations and relevant Species Profile and Threats Database (SPRAT) profiles for EPBC Act list communities. The BDAR does not provide adequate justification for why the native vegetation does not meet any BC Act or EPBC Act TEC listing. The BDAR needs to include evidence-based justification for identifying or not identifying TECs and process needs to be clearly documented with the BDAR.	Recommended action: CPHR recommends the proponent revises the BDAR to detail TEC determination within the subject site and include reference (but not limited) to: - Identification of TECs including assessment of PCT against the final determinations for BC Act listed communities and relevant SPRAT profiles for EPBC Act list communities, including adequate justification for why the native vegetation does not meet the EPBC Act listing. - Quantitative and qualitative analysis of survey data i.e. discussion of floristics and associated cover to support conclusions	S-BDAR	EcoResolve			A justification for the absence of TECs within the subject land has been added (Section 3.2.2). TEC absence is given with high confidence based on the lack of any TEC association with the PCT present and geographic limits of the TEC associated with alternative PCTs.
8. The BDAR does not meet the requirements of BAM 2020 Stage 1 The BDAR does not meet the requirements of the BAM 2020 as set out in BAM Operational Manual – Stage 1. For example: (General examples) - the BDAR does not provide an adequate description of how this project meets all the requirements for small area streamlined assessment - the BDAR does not provide an adequate hydrology assessment. Table 1 states that there are no rivers or streams but then Figure 2 shows a waterway adjacent the footprint. Further assessment of hydrological setting of the site is required. - the BDAR does not include mapped areas of habitat connectivity on the subject land and assessment area. - the BDAR does not detail the percent native vegetation cover calculation, in accordance with the BAM. The BDAR needs to clearly document this assessment process and provide a map, in accordance with BAM Section 3.2. - the BDAR does not provide BAM plots shown on a map (relative to vegetation zones) that are labelled in a way to allow cross reference with field datasheet. - The BDAR does not include photographic records of BAM plots, including examples of hollows, leaf litter sub-plots, logs and other attributes, which should be retained as a visual record of vegetation condition. - the BDAR does not provide a description of habitat constraints and or suitability, for example the BDAR does not provide a map of hollow bearing trees - the BDAR does not provide a description of the field survey methods, it does not provide justification when survey effort differs from what is described in TBDC, and it does not provide justification that best practice methods were used where no guidelines is available for a species.	Recommended action: Revise the BDAR to meet the requirements of the BAM 2020, and include the following: - adequate description of how the project meets all the requirements for small area streamlined assessment - description of the hydrological setting and potential aquatic habitat. - provide a map of habitat connectivity within the assessment area. - provide detail and map of the percent native vegetation cover calculation - show Plot IDs on a map with mapped vegetation zones - photos of BAM plots etc to meet requirements of the BAM - further information regarding habitat constraints - further information regarding survey methods, including justification of survey method and effort when it differs from what is prescribed in the TBDC for a species.	S-BDAR	EcoResolve			- Additional description of local hydrology added to Table 1 - Added section 1.5 specifying eligibility for small areas assessment - Percent native vegetation cover added to Table 1 - Native Vegetation v Non-Native Vegetation added to map (Section 2. Landscape Context, Figure 2) - Detailed sections added to describe precise survey techniques that were used during field surveys (Section 4.4. Field Surveys). - BAM plot IDs added to Figure 4 - HBTs have been added to the legend in Figure 10 - Habitat connectivity mapping has been prepared and presented in BDAR Figure 3 - A description of the habitat characteristics of the subject land and surrounds is presented in Section 4.5 - Available plot photos were added to Appendix C
9. Spatial data supplied does meet the requirements of BAM 2020. Appendix D of BAM 2020 Operational Manual – Stage 2 – outlines the requirements of the data submission with a BDAR. At this stage CPHR has only completed a preliminary review of the data, due to the high number of instances where the data provided does not meet the minimum attribute requirements as described in Appendix D of BAM 2020 Operational Manual – Stage 2. Examples of this include: - the data supplied for flora transects does not meet the minimum attribute requirements of the BAM, and only the October 2022 flora transect has been provided (not February and June). - the BAM plot data supplied does meet minimum attribute requirements of the BAM - the data supplied for spotlighting transects lists different dates to those listed in Table 5 of the BDAR. It is not clear what species are being targeted by the transect provided (i.e. forest owls, amphibians squirrel glider etc). This is important as it	Recommended action: - revise the BDAR and the associated spatial package to ensure it is in alignment with Appendix D of BAM 2020 Operational Manual – Stage 2 and ensure that all spatial data files are updated accordingly and resubmitted to CPHR. - ensure the minimum data attributes are included for all supplied digital data in accordance with Appendix D of BAM 2020 Operational Manual – Stage 2	Spatial data	EcoResolve		Review and update field and mapping data to meet minimum attributes requirements as per Appendix D of Operational Manual – Stage 2 Locate all data referenced and required in the BDAR and provide in submission data package	Flora transect data – Threatened Flora Survey Traverses (Oct 2022, Feb 2023, March 2026) added to spatial data folder BAM plot data - added to spatial data folder (plot name, bearing, date, PCT ID and Name, condition class, veg zone ID) Spotlighting data – dates in table 7 have been changed to align with the actual dates from the spatial files. Shape files have been clearly labelled to identify which animals were being targeted. November 2022 referenced in table 7 in the last BDAR iteration was incorrect – spatial file of

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demonstrates survey effort has occurred within suitable habitat for target species, and this is a requirement of BAM. - no data has been supplied for November 2022 spotlighting that is referenced in Table 5 of the BDAR - no data has been supplied for Anabat survey dates and locations - no data supplied for the camera traps surveys in 2023 targeting Brush-Tailed Rock-Wallaby and Squirrel Glider or for 2024 dates targeting Glossy Black-Cockatoo - no data supplied for call playback survey dates or locations for forest owls - no data supplied for spotlighting or call playback dates or locations for amphibians (Stuttering Frog) in December 2022 - no data supplied for dusk and dawn bird surveys - the HBT data that has been supplied does not contain the size of hollow(s) for all HBT data points. These data were not recorded - the recorded ‘threatened fauna’ data file does not meet the minimum attribute requirements of the BAM - the recorded ‘threatened flora’ data file does not meet the minimum attribute requirements of the BAM - the species polygon digital files provided do not meet minimum attribute requirements of the BAM	ensure the data supplied is consistent with what is described in the BDAR and the BAM-C.					spotlighting transects for mammals (glider and wallaby) and owls are dated as May 2023 and July 2024. Spotlighting for the Stuttering Frog occurred partially in November 2022 – this has been made clear in both the BDAR and the spatial files. - Spotlighting files now include – date, surveyor, duration, target species, any species observed Anabat – device ID, survey dates (13/2/2023 – 17/02/2023 & 11-15/12/2023) target species and target species recorded added to spatial file. Two points on map (Figure 8) to reflect two Anabats deployed Camera Traps (Mammals & Glossy Black Cockatoo) – Required detail added to spatial file (Device ID, Deployment and Collection Date, Trap Type, Target Species) Call Playback and Spotlighting (Owls & Mammals) – Two separate spatial files, 1 for call playback and 1 for spotlighting tracks. Required data added to both (date, survey duration, target species, species recorded) Frog Survey – Required data added to spatial file (date, survey duration, weather, target species, survey type) Dawn & Dusk Bird Surveys – Details required (duration, date, target species) have been added to the spatial file. Stag Watch –tracks were missing from Figure 8 and have been added, as have the spatial files (date, duration, surveyor, target species). These details have also been added to stag watch point spatial files. HBT – spatial file includes tree species, tree condition, height of hollow, size of largest hollow and DBH (cm) of tree. Unfortunately, data on the number of hollows and the dimensions of each hollow were not recorded. Threatened Fauna - Required details have been added to spatial file (scientific name, common name, date of observation, survey method, source of record) Threatened Flora - Required details have been added to spatial file (scientific name, common name, date of observation, survey method, source of record) Species Polygons – <i>Tetratheca juncea</i>, Squirrel glider, masked owl, glossy black-cockatoo, swift parrot, <i>Grevillea parviflora subsp parviflora</i>. Details

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						added to spatial files for species polygons of above species – PCT ID, PCT Name, Condition Class, Vegetation Zone, Area (ha), Species Scientific Name, Species Common Name, Rationale for polygon
10. Targeted flora and fauna searches have not been completed in accordance with the BAM, Threatened Biodiversity Database Collection (TBDC) and relevant survey guidelines Survey effort to determine presence for the following species does not meet the minimum requirements specified in the BAM, or Surveying threatened plants and their habitats (2020) or the TBDC: • Corunastylis insignis Syn. Genoplesium insigne (SAII) • Corunastylis sp. Charmhaven Syn. Genoplesium branwhiteorum (SAII) • Rhizanthella slateri (SAII) • Thelymitra adorata (SAII) CPHR recommends the proponent review the TBDC for each, for example most require evidence that a reference population has been checked, they also require repeat surveys if not detected, and Corunastylis sp. Charmhaven has been surveyed outside recommended survey timing. Survey effort to determine presence for the following species does not meet the minimum requirements specified in the BAM, relevant guidelines, or the TBDC: • Stuttering frog (SAII) (the 'NSW Survey Guide for Threatened Frogs' states 4 repeat surveys required)	Recommended action: To meet the minimum requirements of the BAM: • provide adequate justification and evidence to ensure survey for threatened flora and fauna has been completed in accordance with the BAM, TBDC and relevant survey guidelines. Alternatively, presence can be assumed or provide an expert report as per Section 5.2 of the BAM. • describe survey effort with adequate detail, presented in a concise way that describes survey dates, survey effort and survey method. • the start and end time and number of survey repeats must be reported to accurately understand the survey effort. • data supplied needs to meet the requirements of the BAM, described in Appendix D of BAM 2020 Operational Manual – Stage 2.	Field work	EcoResolve			The requirements for assessing SAI threatened orchid species have been detailed in our response to Item 4. The actions taken to address insufficient surveys include: • <i>C. insignis</i> – orchid expert to do report • <i>C. sp. Charmhaven</i> – orchid expert to do report. Further, timing of survey was incorrectly put down as October 2022. The species was actually surveyed for in February 2023 (rectified accordingly in BDAR). However, as an orchid expert is going to do a report this in neither here nor there. • <i>R. slateri</i> – as noted above, we could not locate any reference populations or a nominated species expert. Surveys were conducted in accordance with the TBDC guidance for survey • <i>T. adorata</i> – orchid expert to do report • Stuttering Frog (<i>M. balbus</i>) – four more nights of aural-visual surveys have been completed (06-08/01/2026 & 27/01/2026) in accordance with survey requirements for this species (added to BDAR and in spatial files). No evidence of the species was recorded during these surveys (not sightings or calls). Survey data have been thoroughly reviewed and updated to meet Appendix D minimum data standards
11. Further assessment and survey requirements for Masked Owl Given the Masked Owl was recorded and there are also suitable hollows recorded within the disturbance footprint, the following is required: • in accordance with the updated guidance (Biodiversity Offsets Scheme Update No. 24) if an owl is recorded onsite, an 800 m buffer is to be established (as per TBDC) around the record. • following this, and in accordance with the BAM, the avoid, minimise and offset hierarchy is to be applied. Avoidance of the majority of trees containing suitable hollows for Masked owl is strongly recommended. • if impacts to trees containing suitable hollows is proposed, these should be identified and mapped, including hollows within 200 m of the impact. • surveys should then be undertaken to confidently conclude absence of any breeding activity within any of the identified hollows. This should involve stag watching all trees that contain suitable hollows for breeding for Masked owl (i.e. living or dead tree with a hollow >20cm diameter that occurs >4m above the ground).	Recommended action: • Complete additional recommended surveys to confirm the absence of breeding activity from the proposed site, and to demonstrate adequate avoidance.	Field work	EcoResolve			• Nest Hollow Mapping and stag watch surveys were undertaken for the masked owl in February 2026 (06-08/02/2026). These details have been added to the BDAR (survey detail table, weather data table and fauna survey map). • No evidence of breeding or nesting was recorded during these extra surveys. • The current species polygon for the masked owl includes all mapped suitable PCTs within the site, which includes the five suitable HBTs that were recorded.

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12. The BDAR does not meet the requirements of BAM 2020 Stage 2 (General examples) The BDAR does not meet the requirements of the BAM 2020 as set out in BAM Operational Manual – Stage 2, for example: - the BDAR does not provide an adequate justification for the modification or the final footprint in the Avoid and Minimise chapter. All alternate options that were considered must be outlined - the BDAR does not provide detailed description of the biodiversity values of the previous footprint including mapping. The chapter currently states that the footprint has been reduced from 12.91 ha to 2.98 ha, but further detail is required to meet the requirements of chapter 7 of the BAM - the BDAR does not provide mapping of indirect impact areas and alignment with the impacts listed in Appendix L checklist. - the BDAR does not provide adaptive measurement strategies in the case mitigation measures fail. Tables 8 and 13 within the BDAR currently do not propose adaptive management strategies. These must also be included in a table as per section 8.5 of the BAM.	Recommended action: Revise the BDAR to meet requirements of the BAM 2020 Stage 2, and include the following: - adequate description of all other options considered and adequate justification for the final design footprint. This should include a full analysis of other technologies as per subsection 7.1.1 (4) of the BAM - detailed description of the biodiversity values avoided by reducing the footprint to demonstrate adequate avoidance and minimisation - mapping of indirect impact zones as described in subsection 7.2.1 (3) of the BAM - mitigation measures must include a risk rating for failure (as described in subsection 8.4.1 (2) of the BAM) - adaptive measurement strategies must be outlined and included in a table as per section 8.5 of the BAM	S-BDAR	EcoResolve			Table 10 Impact Mitigation Measures has been updated to include a risk rating, summary of likely consequences and adaptive responses that would be undertaken in the event that the mitigation measure fails to prevent an impact.
13. Prescribed impacts have not been adequately assessed. Prescribed additional biodiversity impacts (prescribed impacts) must be assessed as part of the BOS, in line with clause 1.6 and 6.1 of the Biodiversity Conservation Regulation 2017 (BC Regulation). Clause 1.4 of the BC Regulation notes habitat connectivity as a prescribed impact. The BDAR must further consider impacts to connectivity. The BDAR must provide a description of each species likely to be impacted by the loss of connectivity described in BDAR section 5.7.	Recommended action: further assess the avoidance and minimisation of prescribed impacts as per subsection 7.2.2 of the BAM update Table 12 to include species likely to be impacted	S-BDAR	EcoResolve			A detailed assessment of potential impacts to threatened species, including a list of those potentially affected has been included in Table 12 (now Table 15).
14. Inconsistencies between BDAR and BAM-C The timing of targeted species surveys for two candidate species is not accurately entered into the BAM-C. The survey dates within Table 5 of the BDAR do not match those entered Tab 6 of the BAM-C for the following species: - Corunastylis sp. Charmhaven - Glossy Black-Cockatoo	Recommended action Updates to the BAM-C or the BDAR are required to ensure it reflects when targeted surveys were conducted. Adequate spatial data files need to be supplied as evidence.	S-BDAR & BAM-C				BDAR updated in Table 5 (now Table 7) to include targeted surveys timing. Figures 7 and 8 demonstrate survey effort.
15. Additional mitigation measures should be considered Table 8 of the BDAR provides impact mitigation measures. The BDAR does not detail any mitigation measures to minimise the impacts to fauna during vegetation clearing activities. CPHR considers that a number of additional measures should be included to minimise risk of impacts to threatened fauna. These mitigation measures are described below: - scheduling the clearing works for a time of year to avoid the breeding seasons of identified potential threatened species and other fauna that may breed on site - comparative habitat assessments should be conducted on clearing sites and proposed release sites to ensure that habitat features are available in the released sites - a two staged clearing procedure should be implemented where habitat trees are cleared 24-48 hours after clearing of non-habitat trees to allow fauna an opportunity to leave the disturbed area	Recommendation: Additional mitigation measures should be considered and detailed in the BDAR.	S-BDAR	EcoResolve			EcoResolve acknowledges the comments regarding the inclusion of additional mitigation measures to minimise impacts to fauna during vegetation clearing activities. In response, the BDAR has been updated to strengthen the assessment of fauna impact management. Specifically, Table 9 has been revised to incorporate additional and more detailed mitigation measures addressing fauna protection during clearing. These measures include, where reasonable and practicable, staged and directional clearing, pre-clearing inspections, management of hollow-bearing trees, consideration of temperature constraints, and protocols for identifying and utilising suitable release areas. In addition, a new section (Section 5.3.1 – Fauna Handling and Relocation) has been included in the SBDAR to provide a

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• HBTs should be felled in sections to avoid harm to any fauna remaining in the hollows • release sites should be identified and mapped prior to clearing and all appropriate approvals granted by the landholders • tree clearing should not be conducted above 35°C in the interests of animal welfare • communication should occur with rescue agencies and local veterinarians prior to the commencement of clearing to confirm the availability of resources for any captured/injured fauna that is unable to be released • clearing should be conducted sequentially and directionally towards areas of refuge to prevent the creation of vegetation islands • felled trees should be positioned so that hollows are facing upwards and out to allow any fauna to escape overnight • sections of cleared vegetation containing hollows should be placed in adjoining vegetation to allow re-use • hollows removed should be offset with hollow replacements in adjoining vegetation on a like for like basis given the size of the hollows proposed for removal. The natural replacement of these medium, large and extra-large hollows does not align with the lifetimes of the fauna currently using them • a hollow replacement strategy should be prepared to outline how this replacement will occur. • The BDAR should also provide a detailed appraisal of how injured and uninjured animals will be treated, particularly with respect to relocation to nearby habitat.						detailed appraisal of how both injured and uninjured fauna will be managed during clearing activities. This section outlines the role of qualified ecologists during clearing, procedures for fauna handling, and the approach to relocation into suitable nearby habitat, as well as the management of injured fauna in accordance with relevant animal welfare guidelines. The mitigation measures adopted are consistent with the requirements of the Biodiversity Assessment Method (BAM), which requires impacts to be avoided and minimised where reasonable and practicable. The measures included in the updated BDAR reflect standard industry practice and are considered appropriate to minimise impacts to threatened fauna within the constraints of the Project. Residual impacts to fauna that cannot be avoided or minimised will be addressed through the Biodiversity Offsets Scheme in accordance with the Biodiversity Conservation Act 2016. Accordingly, the BDAR has been updated to address the matters raised and now provides an appropriate and comprehensive framework for fauna impact mitigation and management.
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