

Assessment of EPBC Act listed threatened species and communities using the NSW Framework for Biodiversity Assessment

Suggested information to be included in the submission

1. Identifying MNES

(a) **Confirm** whether all the EPBC Act-listed threatened species and communities that occur on the project site, or in the vicinity are identified in the EIS. Note which species and/or communities have not been identified.

The EPBC Act-listed threatened species and communities that occur on the project site or in the vicinity as generated from the Environmental Reporting Tool (ERT) have been identified in the EIS (Table B2, Attachment B, Appendix F). An assessment of the likelihood of each entity occurring has been undertaken, and a decision as to whether an assessment of significance is required has been made.

All species listed in the referral documentation that are likely to be significantly impacted have been identified in the EIS:

Regent honeyeater (*Anthochaera phrygia*)

Swift parrot (*Lathamus discolor*)

Koala (*Phascolarctos cinereus*)

Species considered by DoEE that may be significantly impacted are:

Corben's long-eared bat (*Nyctophilus corbeni*)

Large-eared pied bat (*Chalinobolus dwyeri*)

Murray cod (*Maccullochella peelii*) - note that this species is assessed in Appendix B of Appendix N (Aquatic Ecology Assessment) of the EIS. Given that this species is not listed under the *Threatened Species Conservation Act 1995* it has not been assessed under the Framework for Biodiversity (FBA), and is therefore not included in the assessment herein.

(b) **Comment** on whether the Framework for Biodiversity Assessment (FBA) has been applied to all EPBC Act-listed threatened species and communities that occur on the project site or in the vicinity.

The Commonwealth assessment footprint (as referred to in the EIS) comprises 901.7 hectares in the mine site footprint and 82.7 hectares in the rail spur footprint. The area referred in the mine site is larger than the area being assessed in the NSW footprint, as part of the approved mine (SSD-5000) was not previously referred under the EPBC Act. The NSW mine site footprint is 775.8 hectares – 208.6 hectares smaller than the Commonwealth footprint.

All entities that were identified as requiring an assessment of significance have been assessed. Impacts on the three species likely to be significantly impacted and the two species that may be significantly impacted were identified and credit liabilities were determined.

Two EPBC Act-listed species have been recorded in the project footprint – the koala and painted honeyeater. The Corben's long-eared bat and the large-eared pied bat have been potentially recorded in the footprint based on call recordings, but these recordings could not be confirmed.

Whilst the minimum number of transects/plots were undertaken for each vegetation zone, seventeen of the flora plots were located in the broader development site, but not in the final site footprint. The final site footprint has been amended over time as outlined in section 4.11.3 of the EIS. It was appropriate to include the information from these plots in the BioBanking Credit Calculator due to one or more of the following:

- the patch of vegetation the plot occurs in enters the site footprint
- the plot occurs in the same vegetation zone and same paddock as other plots used, meaning the plot in question was subject to the same disturbance history as plots located within the footprint
- site attribute scores from the plots outside the footprint were not substantially different from the plots within the footprint.

Little explanation was provided detailing why no flora plots had been completed in the areas mapped as “disturbed land”, and why an offset is not required to be determined for these areas. Additional information provided by the proponent shows photos and recent monitoring information from the Canyon Coal Mine (located in the north of the proposed mine site). The landscape is either disturbed or contains vegetation that is predominantly exotic. The remainder of the land mapped as disturbed has been cropped in recent years.

Ecosystem credits have been generated for EPBC Act-listed threatened species DoEE has determined are likely to be significantly impacted, as well as those with the potential to be significantly impacted. In addition, species credits have been generated for the koala and regent honeyeater.

A Biodiversity Offset Strategy (BOS) has been submitted with the FBA. However, generation of species credits at the proposed offset sites do not conform to the FBA, and additional information is required to satisfy the proposed generation of ecosystem credits at the proposed offsets sites (see section 3 of this assessment).

*(c) In the circumstance where there are EPBC Act-listed species that are not addressed by the FBA (i.e. migratory species) **comment** on whether these species have been assessed in accordance with the SEARs and provide references to where the assessment information is detailed in the EIS.*

Not applicable.

*(d) **Verify** that the proponent has expressed a statement about the potential impact i.e. likely significant, low risk of impact, not occurring, for each listed threatened species and community protected by the EPBC Act referred to in 1(a). Note which species and/or communities have not been addressed in this manner.*

An assessment of whether each threatened species is likely to occur in the project footprint and a subsequent assessment of significance has been undertaken (B3 – Impacts on threatened species and communities listed under the EPBC Act – Attachment B – Appendix F). The results are:

- Regent Honeyeater – unlikely to be significantly impacted as it has not been recorded using potential habitat in the footprint, much of the potential habitat has been cleared, the project is not located in a key breeding area, and similar habitat is widespread in the surrounding landscape.
- Swift parrot - unlikely to be significantly impacted as the species does not breed in NSW, it is a highly nomadic species, and the presence of a greater extent of habitat in the locality.
- Koala – unlikely to be significantly impacted as only one hectare of primary koala feed trees occur in the footprint, similar and better habitat is more widespread outside of the footprint, and koala records are widespread outside of the footprint.

Entities that may be significantly impacted were also assessed:

- Corben’s long-eared bat – unlikely to be significantly impacted as much of the potential habitat has been cleared, similar and better habitat is more widespread outside the footprint, and the species is widespread in the landscape outside the footprint.
- Large-eared pied bat - unlikely to be significantly impacted as there is no breeding habitat in the footprint, and there is a greater extent of habitat in the locality known to be used by the species.
- Murray cod – unlikely to be significantly impacted as there would be little impact to cod habitat, and there would be limited indirect impacts.

Entities that are considered unlikely to be significantly impacted but were still assessed according to the *Significant Impact Guidelines 1.1: Matters of National Environmental Significance* include:

- Weeping Myall Woodland Endangered Ecological Community – unlikely to be significantly impacted as no EEC is located within the footprint.
- Belson’s panic (*Homopholis belsonii*) - unlikely to be significantly impacted as the species is not located within the footprint.
- Winged peppergrass (*Lepidium monoplocoides*) - unlikely to be significantly impacted as the species is not located within the footprint.
- *Tylophora linearis* - unlikely to be significantly impacted as the species is not located within the footprint.

- Painted honeyeater (*Grantiella picta*) – unlikely to be significantly impacted as much of the potential habitat has been cleared, it is likely the painted honeyeaters recorded near the project were recorded in river she-oaks along the Namoi River, and similar and better habitat is located outside the footprint.

(e) **Identify** where further information from the proponent is critical to the assessment of MNES particularly in relation to mapping Table 1 (A), analysis of impacts Table 1 (F) and Table 2 (F), avoidance, mitigation and offsetting, and 6.

The generation of species credits at the proposed offset sites do not conform to the FBA and additional information is required to satisfy the proposed generation of ecosystem credits at the proposed offsets sites. The proponent also proposes to use ecological rehabilitation to generate ecosystem credits, however the information required by the FBA has not been provided in the BOS.

The information requested of the proponent at the EIS exhibition stage was not adequately provided in the Response to Submissions (RTS) report. The RTS states that the proponent will address the inadequacies in the BOS following commencement of the project. The proponent commits to satisfying the project offset requirement through retiring the number and type of offset credits applicable to the project.

2. Assessment of the relevant impacts

All EPBC Act-listed species and/or communities that the Commonwealth consider would be significantly impacted (as noted in the referral documentation) should be assessed and offset. These are referred to as relevant impacts

(a) **Verify** [by ticking the following boxes]:

- ✓ the nature and extent of all the relevant impacts has been described
- ✓ measures to avoid and mitigate have been described
- ✗ an appropriate offset for any residual adverse significant impact has been determined.

Impacts to EPBC Act-listed species have been described throughout the Biodiversity Assessment Report (BAR) as required by the FBA.

Measures to avoid and mitigate have been described in section 5.1 of Appendix F of the EIS.

The proponent has committed to satisfying the project offset requirement, however the BOS provided in the EIS does not conform to the FBA.

(b) **Note** if information in relation to any of these boxes has not been provided for any relevant EPBC Act-listed species and communities.

The BAR proposes that ecosystem credits will be generated from the ecological rehabilitation of the mined land. The BAR does not contain information on the plant community types (PCTs) to be rehabilitated, rehabilitation objectives, or completion/relinquishment criteria for each PCT.

Generation of species credits for the koala and the regent honeyeater do not conform to the FBA. No justification has been provided for the area of habitat attributed to the species to generate the proposed species credits. Species credits can only be generated on offset sites if the species has been recorded on the offset site, or an expert report has determined that the species is likely to be present on site. The regent honeyeater has not been recorded at any of the proposed offset sites. The koala has not been recorded on three offset areas, and it was recorded more than five years ago on the fourth site. No expert reports have been provided for any species.

Information is lacking regarding the generation of ecosystem credits on the proposed offset sites. Detail is lacking regarding survey methodology and survey effort, justification of vegetation community selection, vegetation community descriptions, and information regarding the threatened flora species recorded.

The requested information was not provided in the Response to Submission (RTS) report. The proponent has committed to fulfilling the offset requirement following commencement of the project.

(c) There may be listed threatened species and communities for which the proponent will claim that the impact will be **not** significant in accordance with the EPBC Act Significant Impact Guidelines. Please **provide** advice for cases where OEH disagrees with this finding.

Not applicable.

(d) Provide references to where specific lists or tables are detailed in the EIS i.e. List of EPBC Act-listed EECs Appendix J Table 4 pg 65

Section 4.11.1 – Main report of EIS.

Commonwealth assessment footprint components - Table 21 – Page 77 - Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Vegetation types representing potential habitat for species credit species in the Commonwealth assessment footprint associated with the mining area – Table 27 – Page 86 - Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Threatened species listed under the EPBC Act in the OEH credit calculator – Table 28 – Page 87 - Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Swift parrot ecosystem credit requirements for the Commonwealth assessment footprint – Table 29 – Page 89 - Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Regent honeyeater and koala species credit requirements for the Commonwealth assessment footprint – Table 30 – Page 91 - Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Additional clearance in the Commonwealth assessment footprint – Table 35 – Page 113 - Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Relevant Matters of National Environmental Significance – potential habitat clearance – Table 36 – Page 114 - Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Project species credit requirements – Table 39 – Page 122 - Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Threatened species listed under the EPBC Act – Table B2 – Page B-5 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Relevant threatened species and communities survey effort – Table B3 – Page B-10 - Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Likelihood of a significant adverse impact on weeping myall woodland EEC – Table B4 – Page B-12 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Likelihood of a significant adverse impact on Belson's panic – Table B5 – Page B-13 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Likelihood of a significant adverse impact on winged peppergrass – Table B6 – Page B-15 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Likelihood of a significant adverse impact on *Tylophera linearis* – Table B7 – Page B-16 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Likelihood of a significant adverse impact on the regent honeyeater – Table B8 – Page B-19 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Likelihood of a significant adverse impact on the swift parrot – Table B9 – Page B-22 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Likelihood of a significant adverse impact on the painted honeyeater – Table B10 – Page B-24 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Likelihood of a significant adverse impact on the painted honeyeater – Table B11 – Page B-25 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Koala habitat appraisal – Table B11 – Page B-27 - Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Likelihood of a significant adverse impact on the koala – Table B12 – Page B-28 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Likelihood of a significant adverse impact on the Corben's long-eared bat – Table B13 – Page B-31 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Likelihood of a significant adverse impact on the large-eared pied bat – Table B14 – Page B-33 – Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Protected Matters and Mitigation Measures – Table B15 – Page B-36 - Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Assessment summary – Table B16 – Page B-39 - Attachment B to Appendix F – Biodiversity Assessment Report and Biodiversity Offset Strategy

Table 1 Impact Summary Relevant EPBC Act –listed Ecological Communities (refer to section 3)

A	B	C	D	E		F	G
EPBC Act -listed EEC	Y/N	PCTs	Y/N/comment	Ha	Credits	Comment	Relevant page numbers in the EIS
N/A.							

- (A) **List** the relevant EPBC Act listed ecological communities that will be significantly impacted in accordance with the referral documentation.
- (B) **Verify** that there is evidence in the EIS that listed EEC and species habitat has been mapped in accordance with relevant listing guidelines (Yes/No).
Proponents are required by the SEARs to ensure that EPBC-listed communities are mapped in accordance with EPBC Act listing criteria. It is important that any derived native grassland components of an EPBC listed EEC are included in the mapping of native vegetation extent.
- (C) **List** the Plant Community Types (PCTs) associated with the ecological communities in accordance with Chapter 5 of the FBA.
- (D) **Confirm** that the identification of PCTs has been correct (Yes/No) and comment if not correct.
- (E) **Record** the area of impact (ha) and credits required.
- (F) **Comment** on the analysis of the impacts in relation to the nature and extent of the impact and whether or not the EIS includes an analysis of the direct and indirect impacts to the EEC. Note whether further information might be required.
- (G) **Cite** relevant page numbers for details provided the EIS and Appendices for each EEC.

Table 2 Impact Summary Relevant EPBC Act –listed Species (refer to section 4)

A	B	C	D	E		F	G
Threatened species (listed under the EPBC Act)	Credit Type (SC/EC)	Record PCTs associated with ecosystem credits	Y/N/Comment	Ha (total species habitat)	Credits (total species habitat)	Comment	Relevant page numbers in the EIS and Appendices
Swift Parrot	EC	PCT 397 Poplar box – white cypress pine shrub grass tall woodland of the Pilliga – Warialda region, Brigalow Belt South bioregion (NA 324)	Y	104.7	5,387	The impact has been assessed in accordance with the FBA. PCTs the species is associated with have been identified, and the area to be impacted has been stated. Associated ecosystem credits have been calculated. No further information is required.	Main report: pp 4-86, 4-96 Appendix F: pp 27, 35, 38, 67, 84, 87, 89, 90, 114, 148. Attachment A: pp A-2, A-26 to A-36 Attachment B: pp B-21 to B-23
		PCT 594 Silver-leaved ironbark – white cypress pine shrubby open forest of Brigalow Belt South bioregion and Nandewar bioregion (NA349)					
		PCT 459 Narrow-leaved ironbark – black cypress pine – white box shrubby woodland in sedimentary hills of the Gunnedah region, Brigalow Belt South bioregion (NA311)					
		(NA193)					
Regent Honeyeater	SC		Y	75.2	5,790	The impact has been assessed in accordance with the FBA. Species credit polygons have been created. No further information is required.	Main report: pp ES-3, 4-96, 4-97 Appendix F: pp ES-3, 24, 35, 41-46, 64, 70-72, 86, 90-91 Attachment A: pp A-3, A-45 to A-50 Attachment B: pp B-6, B-10, B-18 to B-23, B-36, B-39
Koala	SC		Y	80.9	2,103	The impact has been assessed in accordance with the FBA. Species credit polygons have been created. Discussions	Main report: pp 4-84, 4-86, 4-87, 4-95 to 4-97 Appendix F: pp ES-2, ES-3, 25, 32, 36, 41-42, 46-49,

						between BCD and the proponent occurred regarding vegetation to be included in the species polygons between the EIS and RTS. Polygons remained the same as those in the EIS. No further information is required.	65, 70, 72, 86, 88, 90-91, 105, 109-112, 114, 122 Attachment A: pp A-3, A-53 to A-57 Attachment B: pp B-10, B-26 to B-29, B-37, B-40
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- (A) **List** the relevant threatened species that will be significantly impacted in accordance with the referral documentation.
- (B) **Record** whether the relevant threatened species is classified as “species credit species” of ecosystem credit species for the purposes of the FBA.
- (C) **List** the PCTs associated with the ecosystem credit species.
- (D) **Verify** that the habitat polygons for MNES have been mapped appropriately representing the foraging and/or breeding habitat for the species that will be impacted by the development.
- (E) **Record** the area of impact (ha) and credits required. For impacts associated with ecosystem credit species identify the total credit requirements associated with the cleared PCTs identified as habitat for the species.
- (F) **Comment** on the adequacy of the analysis of the impacts in relation to the nature and extent of the impact and whether or not the EIS includes an analysis of the direct and indirect impacts to the species. Note if further information is required.
- (G) **Cite** relevant page numbers for details provided in the EIS and Appendices for each threatened species.

3. Avoid, mitigate and offset

Comment on whether or not the EIS identifies measures to avoid and minimise impacts on the relevant EPBC Act-listed threatened species and communities. Section 8 of the FBA requires that proponents detail these efforts and commitments in the EIS. Identify gaps in the discussion on measures to avoid and minimise impacts on Commonwealth matters. Provide references to sections and page numbers in the EIS.

Section 5.1 of Appendix F and section 4.11.3 of the main report detail the measures that have been implemented to avoid and minimise impacts. Standard mitigation measures will be implemented, including pre-clearing fauna surveys, maximising salvage of resources, and collection and propagation of seed.

The location of the mine is dependent on the presence of coal seams. However, the footprint of the mine has been amended to avoid impacts to native vegetation by optimising placement of waste rock in the open cut void, not developing the approved soil stockpile to the west of the Western Emplacement, and siting the rail spur to minimise impacts on mature riparian vegetation. Over 25 percent of the mine footprint is located on disturbed land that does not contain native vegetation.

A Koala Plan of Management (KPoM) will be prepared for the project in order to minimise impacts from the project on the koala.

References:

- Mitigation measures and management – section 4.11.3 – Main Report – page 4-88.
- Impact assessment and measures to avoid and minimise impacts - Section 5.1 of Appendix F – page 92
- Existing impact avoidance and mitigation measures – Table 31 – Appendix F – page 92
- Direct impacts and measures to avoid and minimise impacts – section 5.1.2 of Appendix F – page 96
- Additional impact avoidance and mitigation measures – Table 34 – Appendix F – page 105

Comment on the adequacy and feasibility of measures to avoid and minimise impacts. Identify inadequacies where further efforts could be made to avoid and minimise impacts on Commonwealth matters. Provide references to sections and page numbers in the EIS that discuss avoidance and mitigation measures relevant to EPBC Act-listed species and communities.

See discussion above.

Given the presence of the coal seams, the ability to avoid impacts to native vegetation and fauna habitats is limited. However, waste rock emplacement has been designed to reduce impacts to native vegetation, and a previously-approved soil stockpile will not be developed, thereby reducing impacts to native woodland.

A Plan of Management will be prepared for the least-mobile of the EPBC Act-listed species, the koala. The KPoM will outline mitigation measures to be implemented on-site to minimise impacts to the species.

BCD is satisfied with the avoidance and mitigation measures proposed.

EIS references are the same as above.

4. Offsetting

(a) **Verify** [by ticking the following boxes] that the offsets proposed to address impacts to EPBC-listed threatened species and communities are in accordance with the requirements under the EPBC Act.

- ✓ An appropriate offset for any residual adverse significant impact has been determined.
- ✗ Proposed offsets for EECs provide a like for like outcome i.e. proponents have identified PCTs attributed to the specific threatened ecological community being impacted
- ✗ Proposed offsets have been determined using the FBA

If offsets have not been determined in accordance with the FBA, Planning is required to discuss the proposed approach with the Commonwealth as soon as possible.

The BAR proposes that the biodiversity offset obligation will be met through credits gained from mine rehabilitation, land-based offsets, and potentially through payment into the Biodiversity Conservation Fund or through supplementary measures. Whilst BCD is satisfied that an appropriate offset obligation has been calculated for residual impacts to biodiversity, the proposal to retire the offset obligation has been developed using inadequate information or incorrect assumptions.

Proposed ecological mine rehabilitation should detail the target PCTs to be rehabilitated, completion/relinquishment criteria for each PCT, and rehabilitation objectives. The BOS does not include any of this information.

The generation of species credits for the koala and regent honeyeater does not conform to the FBA. No survey method is provided, no details of targeted fauna survey is provided, and no justification has been provided regarding the area of habitat attributed to each species. Further, species credits can only be generated on offset sites if the species has been recorded, or an expert report has determined that the species is likely to occur on the site. The regent honeyeater has not been recorded on any of the proposed offset sites. The koala has been recorded on only one offset site, and it was more than five years ago.

Additional information is required to justify the generation of ecosystem credits. Inadequate information was provided regarding justification of vegetation community selection, vegetation community descriptions, and discussion of the threatened flora species recorded.

Additional information that was requested by BCD following exhibition of the EIS was not supplied in the RTS. The proponent has committed to satisfying the project's offset requirement through retiring the number and type of offset credits applicable to the project.

BCD is satisfied that appropriate conditions will be included in a development consent requiring the proponent to retire biodiversity offset credits in accordance with the relevant legislation. The proponent will be required to conform to the relevant offset rules for EPBC Act-listed species.

5. Comment on whether the information and data relied upon for the assessment have been appropriately referenced in the EIS. Comment on the validity of the sources of information and robustness of the evidence.

The information and data used in the assessment has been appropriately referenced, and the sources of information are valid.

Seventeen flora plots used in the biobanking Credit Calculator were located outside of the footprint. This occurred due to the footprint changing during the period of the assessment. Use of the plots has been justified by the proponent.

The information used to generate biodiversity credits for the offset sites is not appropriately robust. The proponent has not provided additional information to address BCD's concerns. The proponent has committed to developing a BOS that fulfils the offset requirement following approval of the project.

Table 3 Summary of Offset Requirements

A	B	C	D	E	F
Threatened species or EEC (listed under the EPBC Act)	Credits required as calculated by the FBA	Credits generated from offsets in remnant vegetation	Credits generated from offsets proposed by other means	Comment on the proposed offsets.	Relevant page numbers in the EIS and Appendices
Swift parrot	5,387	5,387	0	As per the EIS, the proponent intends to secure land-based offsets to fulfil the biodiversity credit liability for the three EPBC Act-listed species. However, BCD is not satisfied that the generation of credits on the offset sites has been undertaken in strict accordance with the FBA. Additional information was requested following exhibition of the EIS, however this was not addressed in the RTS report. The proponent has committed to fulfilling the offset obligation in full and in accordance with relevant legislation. BCD is satisfied that the development consent will contain relevant conditions stating the biodiversity obligation to be retired, and the options available to retire the credits.	Appendix F: pp 147-150.
Regent Honeyeater	5,790	5,790	0		
Koala	2,103	2,103	0		

- (A) **List** the relevant threatened species or ecological community included in the proposed offset package (these are the listed species and communities that will be significantly impacted in accordance with the *EPBC Act Significant Impact Guidelines 1.1.*). Identify any relevant species or ecological communities which have not been included in the proposed offset package.
- (B) **List** the total credit requirement identified by the FBA for impacted listed threatened species and ecological community. For EECs and ecosystem credit species this is the sum of the credits generated by PCTs associated.
- (C) **Identify** the total number of required credits which are proposed to be retired through conserving and managing remnant / mature vegetation.
- (D) **Identify** the number of credits proposed to be met through other methods allowable under the FBA, such as rehabilitation of impacted areas or regrowth vegetation.
- (E) **Comment** on the adequacy of the proposed offset in meeting requirements of the FBA and the EPBC Act. In particular is there a reasonable argument for a shortfall in credits required for MNES and/or non-compliance with like-for like? Are the offsets proposed by means other than protection of remnant vegetation adequate?
- (F) **Reference** the relevant page numbers from the EIS and Appendices for each threatened species and community.