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Offset Measures Biodiversity Management Plan

Central-West Orana REZ transmission project

April 2026

Acknowledgement of Country

The Energy Corporation of New South Wales acknowledges that it stands on Aboriginal land. We acknowledge the Traditional Custodians of the land and we show our respect for Elders past and present through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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3	13/03/25	Administrative changes following Planning Secretary approval (ER-approved per condition A12(c))
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Document approvals	
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Appendix A Box Gum Woodland distribution in the project locality

Appendix B Regent Honeyeater distribution in the project locality

Appendix C Regent Honeyeater important habitat present on the Home Hills Offset

Abbreviations

Acronym	Definition
AOO	Area of occurrence
BAM	Biodiversity Assessment Method
BC Act	<i>Biodiversity Conservation Act 2016 (NSW)</i>
BC Regulation	<i>Biodiversity Conservation Regulation 2017 (NSW)</i>
BCS	NSW Department of Biodiversity, Conservation and Science Directorate of the NSW Department of Climate Change, Energy, Environment and Water
BDAR	Biodiversity Development Assessment Report (Revision D, dated March 2024)
BMP	Biodiversity Management Plan
BSA	Biodiversity Stewardship Agreement
CEEC	Critically endangered ecological community
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DNG	Derived Native Grassland
DPHI or Department	NSW Department of Planning, Housing and Infrastructure
EC	Ecological communities
EnergyCo	Energy Corporation of NSW
EP&A Act	<i>Environmental Planning & Assessment Act 1979 (NSW)</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)</i>
EPBC Act Approval	The Commonwealth approval for the Central West Orana REZ transmission project approved by a delegate of the Minister for Environment on 8 August 2024 (EPBC Act referral 2022/09353)
EOO	Extent of occurrence
ha	Hectare
LGA	Local Government Area
NPWS	NSW National Parks and Wildlife Service
NSW Approval	The infrastructure approval for the Central West Orana REZ transmission project that was approved by the Minister for Planning and Public Spaces on 26 June 2024 (SSI 48323210)
PCT	Plant Community Types
Project	Central- West Orana REZ transmission project
REZ	Renewable Energy Zone
SAII	Serious and Irreversible Impacts
SSI	State Significant Infrastructure
TEC	Threatened ecological communities
VIS	Vegetation integrity score

1. Introduction

1.1 Context

This Biodiversity Management Plan, referred to as the Offset Measures Biodiversity Management Plan, has been prepared to address the relevant requirements of the NSW Approval (SSI-48323210), commitments relating to Serious and Irreversible Impacts and mining offsets in the Biodiversity Development Assessment Report (March 2024) and the additional information letter dated 14 June, for the Central-West Orana REZ Transmission Project (the project).

1.1.1 Background

EnergyCo has gained approval to construct and operate new transmission infrastructure, energy hubs, and switching stations within the Central-West Orana Renewable Energy Zone (REZ). The project will provide 4.5 gigawatts of new network capacity and will enable renewable energy generators to access the project to export electricity to the NSW transmission network.

The project is located within the Warrumbungle, Mid-Western Regional, Dubbo Regional, and Upper Hunter local government areas (LGAs) and generally extends north to south from Cassilis to Wollar and east to west from Cassilis to Goolma (see **Figure 1-1**).

An assessment of the biodiversity impacts of the project was carried out in accordance with the NSW *Biodiversity Conservation Act 2016*, the Biodiversity Assessment Method (BAM) and documented in Biodiversity Development Assessment Report (Revision D, dated March 2024) (the BDAR), which forms part of the EIS. The BDAR included an assessment of entities at risk of Serious and Irreversible Impacts (SAIL), and documented a biodiversity offset strategy that included additional measures for Box Gum Woodland and Regent Honeyeater, as well as additional offsets for impacts to mining offsets.

In carrying out an assessment of the project, the NSW Department of Planning, Housing and Infrastructure (DPHI) issued a request for more information for SAIL entities and mining offsets. In response, a letter was issued to DPHI on 14 June that provided more details on each aspect, including commitments to provide additional and appropriate measures (the Additional Information).

The project was approved by the Minister for Planning and Public Spaces on 26 June 2024 under Section 5.19 of the EP&A Act subject to conditions in Schedule 2 (NSW Approval). A modification request was made on 12 September 2024 for minor changes to the conditions of approval in accordance with Section 5.25 of the EP&A Act. The modifications were approved on the 14 October 2024.

The Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) also approved the project on 8 August 2024 subject to conditions in Annexure A (EPBC Act Approval).

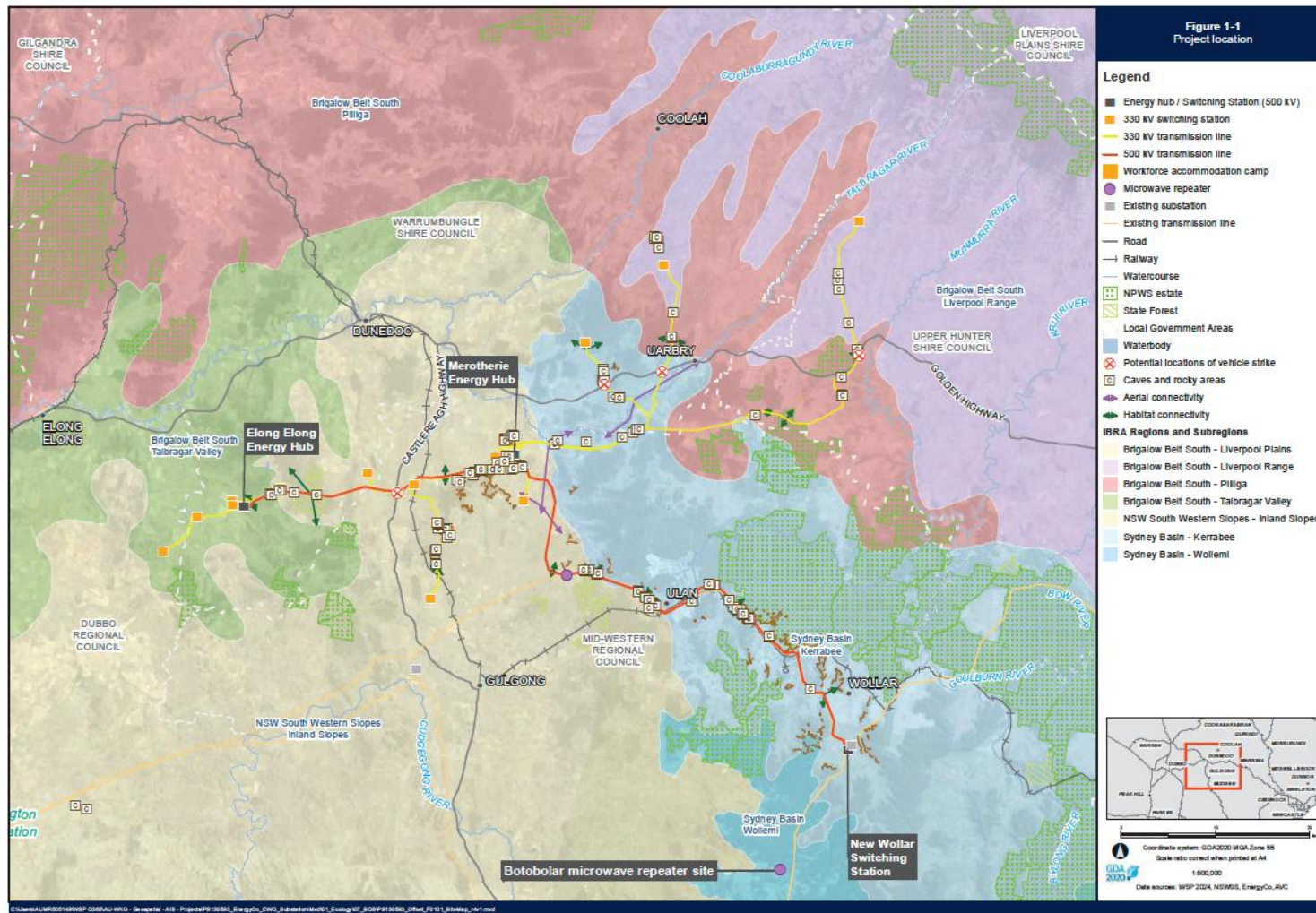


Figure 1-1 Project location

1.2 Staging

Condition C3 of the NSW Approval allows the preparation of strategies, plans or programs on a staged basis, with the approval of the NSW Planning Secretary.

A request was made to the Planning Secretary on 5 August 2024 to stage the Biodiversity Management Plan (BMP), required under NSW Approval condition B26 (post-approval request EnergyCo). The request was to allow the preparation of an Offset Measures Biodiversity Management Plan that addressed the additional measures for Regent Honeyeater and Box Gum Woodland required by B26(d)(xi) and the mine offset replacements required by condition B26(d)(xii) to be satisfied separately to the management of delivery activities associated with the development. The staging request indicated that the Offset Measures Biodiversity Management Plan would be prepared in accordance with condition B26(a) to (c).

The staging request also outlined the approach to revise the Offset Measures Biodiversity Management Plan following targeted surveys required by condition B24 of the NSW Approval. Condition B24 requires further targeted surveys be carried out for the Koala, *Indigofera efoliata* and *Euphrasia arguta* at specified locations. In accordance with B24, and the staging request, the Offset Measures Biodiversity Management Plan would be updated if the targeted surveys indicate that changes to biodiversity offset measures are necessary.

The Planning Secretary approved the staging request on 30 August 2024.

1.3 Preparation of this plan

In accordance with NSW Approval condition B26, this plan has been prepared by the following suitably qualified and experienced personnel:

- Adam Noonan
- Sarah Barker.

Adam Noonan has a master's degree in applied science majoring in environmental science with extensive experience in delivering major linear infrastructure projects through greenfield sites, specifically as part of the recent Pacific Highway upgrade program, Hunter Expressway and Moorebank Intermodal. Adam's responsibility on these projects including other major projects was to the develop and implement construction environmental management plans including sub plans, such as the Biodiversity Management Plan.

Sarah Barker has a degree in science, majoring in land and heritage management. Sarah has over 18 years' experience delivering environmental impact assessments of infrastructure projects, including lead roles on the Central West Orana REZ transmission project (SSI-48323210), Northern Beaches Hospital roadworks (SSI-6434 and SSI-6622),

The Northern Road Upgrade (SSI-7127), the M12 Motorway (SSI-9364), and Sydney Gateway (SSI-9737). Sarah was extensively involved in the biodiversity assessment of the project, including discussions with BAM-accredited assessors, DPHI and relevant specialist agency stakeholders concerning the project's biodiversity impacts, credit liability, offset strategy and appropriate additional measures for potentially impacted serious and irreversible impact entities.

The information contained within this Offset Measures Biodiversity Management Plan has been drawn from the Biodiversity Assessment Development Report (March 2024) that was prepared as part of the project's EIS, and the additional information letter from 14 June 2024. The Biodiversity Assessment Development Report was prepared by Lukas Clews (BAM accredited assessor) and Nathan Stewart (ecologist), reviewed by Toby Lambert (BAM accredited assessor), and reviewed and approved by Alex Cockerill (BAM accredited assessor). The technical content of the additional information letter was prepared by Alex Cockerill. Alex has reviewed and provided input on key matters within this plan and provided technical assistance required to respond to review comments from BCS, NPWS and DPHI.

1.4 Purpose and Objective

The purpose of this Offset Measures Biodiversity Management Plan is to describe the additional measures that will be implemented for Box Gum Woodland and Regent Honeyeater SAI entities and the additional offsets for mining offsets.

The objectives of the Offset Measures Biodiversity Management Plan are to ensure that the following additional measures and commitments relating to SAI entities and mining offsets are met:

- NSW Approval condition B26(d)(xi) - ensuring that an additional 241.16 hectares of Box Gum Woodland and 132.58 hectares of Regent Honeyeater habitat is securely conserved within a Biodiversity Stewardship Agreement within 3 years (over and above the relevant credit obligations)
- NSW Approval condition B26(d)(xii) - ensure appropriate offsets have been provided to replace the obligations of existing offsets on Moolarben, Wilpinjong and Ulan mines (NSW Approval condition B26(d)(xii).
- Commitments in additional information letter to DPHI (14 June 2024), Item 1 and 2.
- Commitments in the Biodiversity Development Assessment Report (March 2024).

1.5 Consultation

1.5.1 Development of this plan

In accordance with NSW Approval condition B26(b), this plan has been developed in consultation with the NSW Department of Biodiversity, Conservation and Science Directorate of the NSW Department of Climate Change, Energy, Environment and Water (BCS) and the NSW National Parks and Wildlife Service (NPWS). The plan has been updated to address the review comments and responses provided to the relevant stakeholders.

1.5.2 Ongoing communication and consultation

Subject to the outcomes of the additional surveys carried out in compliance with SSI approval conditions B24 and B25 and need to update this plan, further consultation with BCS may be required.

1.6 Submission and approval

In accordance with NSW Approval condition A12(a), this plan will be provided to the project Environmental Representative for review and endorsement to ensure the plan is consistent with the requirement(s) under the approval and approved staging request from the Planning Secretary.

This plan will then be lodged with DPHI via the Major Projects portal for review and approval by the Planning Secretary. The approved plan will be forwarded to the Commonwealth DCCEE for information and made available on the project website.

In addition, pending outcomes of the surveys required by NSW Approval condition B24, if substantial changes to biodiversity offset measures in the approved plan are necessary, a revised version of this plan would be lodged with the Planning Secretary for approval. Otherwise, approval from the Environmental Representative in accordance with NSW Approval condition A12(c) will be sought and the approved plan provided to the Department and DCCEE electronically for information.

Following Planning Secretary approval of this plan (and any subsequent revisions), EnergyCo will, within 15 business days, publish this document on the project website per condition 12 b) of the EPBC Act Approval.

1.7 Implementation and Periodic Review

This plan is to be implemented following Planning Secretary approval outlined in Section 2.2 and 5.

This plan will be periodically reviewed until a Biodiversity Stewardship Agreement has been established and appropriate measures have been implemented to satisfy requirements in NSW Approval condition B24 and condition B26(d)(xi) and (xii).

Purpose of the reviews are to ensure measures being implemented remain appropriate and robust to satisfy relevant offset obligations in both the NSW Approval and EPBC Approval.

2. Compliance Requirements

2.1 Regulatory Requirements

Legislation and guidelines relevant to the Offset Measures Biodiversity Management Plan include:

- *Biodiversity Conservation Act 2016 (NSW) (BC Act)*
- *Biodiversity Conservation Regulation 2017 (NSW) (BC Regulation)*
- *Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth) (EPBC Act)*
- *Guidance to assist a decision maker to determine a serious and irreversible impact (DPIE, 2019).*

Serious and irreversible impacts was introduced with the introduction of the BC Act to protect threatened species and threatened ecological communities that are most at risk of extinction through the application of additional consideration for these entities.

Section 6.5 of the BC Act states:

“The determination of serious and irreversible impacts on biodiversity values for the purpose of the biodiversity offsets scheme is to be made in accordance with principles prescribed by the regulations.”

Clause 6.7 of the BC Regulation outlines the principles applicable to determination of “serious and irreversible impacts on biodiversity values” in accordance with Section 6.5 of the BC Act and states:

an impact is to be regarded as serious and irreversible if it is likely to contribute significantly to the risk of a threatened species or ecological community becoming extinct because —

- a) it will cause a further decline of the species or ecological community that is currently observed, estimated, inferred or reasonably suspected to be in a rapid rate of decline (Principle 1), or*
- b) it will further reduce the population size of the species or ecological community that is currently observed, estimated, inferred or reasonably suspected to have a very small population size (Principle 2), or*
- c) it is an impact on the habitat of the species or ecological community that is currently observed, estimated, inferred or reasonably suspected to have a very limited geographic distribution (Principle 3), or*
- d) the impacted species or ecological community is unlikely to respond to measures to improve its habitat and vegetation integrity and therefore its members are not replaceable (Principle 4).*

In relation to Principle 1, DPIE, (2019) defines rapid rate of decline for an ecological community as:

The ecological community should have been observed, estimated, inferred, or reasonably suspected to have undergone, or be projected to undergo, a very large reduction in distribution, being:

- *≥ 90% reduction where the reduction is measured since 1750 (historical decline), or*
- *≥ 80% reduction where the reduction is over a 50-year period, either in the past, future, or any part of the past, present and future.*

The period of decline for an ecological community can be assessed as recent decline, current decline or projected decline which is liable to continue unless remedial measures are taken, or alternatively as historical decline.

In relation to Principle 2, DPIE (2019) defines small population size as those communities with:

- *> 90% extent and severity where the disruption or impacts are measured since 1970; or*
- *80% extent and severity where the disruption or impacts are over a 50-year period, either in the past, future, or any part of the past, present and future*

2.2 Conditions of Approval

The relevant conditions from the NSW Approval are presented in **Table 2-1** and relevant conditions from the EPBC Act Approval are presented in **Table 2-2**. A cross reference and how each condition has been addressed in this plan or other project management documents has been included.

Table 2-1 NSW Approval conditions

Condition No.	Requirement	Where addressed
B24	Prior to carrying out any development that would impact on the relevant biodiversity values, the Proponent must undertake the following further targeted surveys as committed to in the EIS: (a) for koala, in previously unsurveyed patch sizes of less than 5 hectares; and (b) for <i>Indigofera efoliata</i> and <i>Euphrasia arguta</i> , in the area of assumed presence; to confirm whether additional biodiversity offset measures are required for the koala, or reduced biodiversity offset measures are required for the <i>Indigofera efoliata</i> and <i>Euphrasia arguta</i> . Following the completion of the surveys, any required changes to biodiversity offset measures must be incorporated into a revised version of the Biodiversity Offset Package under condition B22 and addressed in a revised version of the Biodiversity Management Plan required under condition B26, in consultation with BCS, to the satisfaction of the Planning Secretary.	N/A ^{1,2}
B26	Prior to carrying out any development that could impact biodiversity values that require offsetting, the Proponent must prepare a Biodiversity Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	This plan
	(a) be prepared by a suitably qualified and experienced biodiversity expert/s;	Section 1.3
	(b) be prepared in consultation with BCS and NPWS;	Section 1.5
	(c) be prepared generally in accordance with the BDAR;	Section 3

Condition No.	Requirement	Where addressed
		Section 4
	(d) include a description of the measures that would be implemented for:	
	(i) meeting the biodiversity mitigation requirements in condition B21;	N/A ¹
	(ii) minimising: - the amount of vegetation clearing on site; - the loss of key fauna habitat (including tree hollows); - the impacts of fauna on site, including undertaking pre-clearance surveys; and - potential indirect impacts on threatened flora and fauna species;	N/A ¹
	(iii) ensuring the development does not adversely affect the native vegetation and habitat outside the disturbance footprint;	N/A ¹
	(iv) protocols for unexpected and incidental finds of threatened species and threatened ecological communities within the disturbance footprint including the requirements for: - all work in the associated location to stop to prevent further impact, and - notification (in writing) and consultation with the Planning Secretary and BCS (and AG DCCEEW where relevant) on any additional measures to be implemented; and - the Planning Secretary to endorse the recommencement of work;	N/A ¹
	(v) rehabilitation of temporary disturbance areas to facilitate natural regeneration with suitable native species;	N/A ¹
	(vi) monitoring the areas of partial clearance within three months of the commencement of construction and provision of a verification report to confirm if any changes are required to this plan;	N/A ¹
	(vii) maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse (such as fauna habitat enhancement) during the rehabilitation and revegetation of the site;	N/A ¹
	(viii) collecting and propagating seed (where relevant);	N/A ¹
	(ix) controlling erosion, weeds and feral pests;	N/A ¹
	(x) bushfire management;	N/A ¹
	(xi) minimising impacts on entities at risk of a serious and irreversible impact (SAII), including	N/A ¹
	(xi) ensuring that an additional 241.16 hectares of Box Gum Woodland and 132.58 hectares of regent honeyeater habitat is securely conserved within a Biodiversity Stewardship Agreement within 3 years (over and above the relevant credit obligations); and	Section 5.1 Section 5.1.2
	(xii) ensure appropriate offsets have been provided to replace the obligations of existing offsets on Moolarben, Wilpinjong and Ulan mines.	Section 5.1.3
	(e) include a program to monitor, evaluate and publicly report on the effectiveness of these measures.	N/A ¹
	Following the Planning Secretary's approval, the Proponent must implement the Biodiversity Management Plan.	Section 1.7 Section 5

Notes:

- 1 Per approved staging approach (refer to section 1.22)
- 2 Will be addressed in future revision to this plan, as required

Table 2-2 EPBC Act Approval conditions

Condition No.	Requirement	Where addressed
3	The approval holder must comply with condition B24 of the NSW Approval in relation to targeted surveys where it relates to Koala	N/A ^{1,2}
6	The approval holder must comply with condition B26 of the NSW Approval in relation to the preparation of a Biodiversity Management Plan to the extent that it relates to protected matters.	This plan
12	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date: (a) the plan is approved by the Minister in writing, if the plan requires the approval of the Minister, (b) the plan is approved by the NSW Planning Secretary as required under the NSW approval which must be complied with in accordance with these EPBC Act conditions.	Section 1.6

Notes:

1 Per approved staging approach (refer to section 1.2)

2 Will be addressed in future revision to this plan, as required

3. Existing environment

The information in this section is sourced from the BDAR and the Additional Information (refer to section 1.3).

3.1 Ecological values

The project is located in a landscape that has been subject to vegetation removal for agricultural and mining purposes. Native vegetation covers approximately 65% of the subject land with the remaining area consisting of cropping land, improved pastures dominated by exotic pasture species, roads and buildings.

The native vegetation recorded within the subject land has been assigned to four vegetation formations and eight vegetation classes that occur across the Brigalow Belt South (Talbragar Valley, Pilliga, Liverpool Ranges), NSW South Western Slopes (Inland Slopes), and Sydney Basin (Kerrabee) IBRA regions.

There were 26 plant community types (PCTs), three threatened ecological communities (TECs) listed under the BC Act, and two ecological communities (ECs) listed under the EPBC Act recorded in the subject land, as documented in the BDAR.

In addition, 16 threatened flora species were recorded or assumed to occur, and fifteen threatened fauna species were recorded or assumed to occur within the subject land, as documented in the BDAR.

An assessment of potential impacts to every potential SAI entity was completed in accordance with Chapter 9 of the Biodiversity Assessment Method and documented in Chapter 9 of the BDAR. The purpose of SAI assessments under the BC Act is to protect threatened species and threatened ecological communities that are most at risk of extinction through the application of additional mitigation.

Section 8.6 of the BDAR details a biodiversity offset strategy for the project that included additional and appropriate measures for SAI entities and mining offset impacts. The additional measures for SAI entities were developed following consultation with BCS and DPHI and with consideration of the SAI assessment. As such, additional measures were included for Box Gum Woodland and the Regent Honeyeater.

It is noted that condition B24 of the NSW Approval requires further targeted surveys for two SAI entities, *Euphrasia arguta* and *Indigofera efoliata*, to confirm whether the species are present within identified assumed habitats. If the surveys confirm presence, additional measures may be required. This Offset Measures Biodiversity Management Plan would be revised to document any additional measures, following consultation with BCS.

3.1.1 Box Gum Woodland

White Box – Yellow Box – Blakely’s Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England Tableland, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South East Corner and Riverina Bioregions (Box Gum Woodland) is listed as a critically endangered ecological community (CEEC) under the BC Act and EPBC Act. The extent of remnant and Derived Native Grassland (DNG) forms of Box Gum Woodland in the locality of the project is shown in **Appendix A**.

Box Gum Woodland is listed as being at risk of SAI under Principle 1 and 2. With regards to reduction in ecological function for the CEEC, activities such as development, mining, agriculture and other anthropogenic factors are impacting on the Box Gum woodland community (DCCEEW, 2023; NSW TSSC, 2020a). While remnants completely cleared will lose all ecological function, remnants which are partially cleared, through clearing of the overstory will have a loss of some but not all ecological function.

The majority of impacts to Box Gum Woodland by the project will occur in largely degraded forms of the community (81.25%) at the edge of existing disturbed areas. The project will not result in significant isolation of any retained patches.

The project will impact 720.83 ha of Box Gum Woodland in varying condition as outlined in **Table 3-1**.

Table 3-1 Impacts to Box Gum Woodland

Condition	Disturbance area A (ha)	Disturbance area B (ha)	Disturbance area HZ (ha)
Woodlands			
Excellent	11.20	26.36	0.00
Moderate to good	37.47	59.68	0.53
Modified and degraded condition			
Thinned	77.94	108.64	0.66
Poor	3.16	4.37	0.00
Regrowth shrubland	0.78	0.00	0.00
Derived native grassland	221.76	0.00	0.00
Highly degraded and below the threshold for offsetting			
No offset	166.95	1.34	0.00
Total	519.25	200.39	1.19

3.1.2 Regent Honeyeater

The Regent Honeyeater is listed as critically endangered under the BC Act (and the EPBC Act) and is at risk of SAI under Principle 1 and 2.

The Regent Honeyeater has undergone and continues to undergo a population reduction, with the apparent loss of some of its minor breeding populations as well as declines at

its two major breeding sites in the Capertee Valley and Bundarra-Barraba. In 2011, it was estimated that the NSW population of Regent Honeyeaters was fewer than 250 mature individuals. Expert opinion suggests that there are currently 350-400 mature individuals in southeast Australia. The NSW Threatened Species Scientific Committee (NSWTSSC, 2011) estimated the extent of occurrence (EOO) at 300,000km² (30,000,000 ha), area of occurrence (AOO) at 250 km² (25,000 ha) in 2000. DoE (2015) estimates the EOO at 600,000km² (60,000,000 ha) and the AOO at 300 km² (30,000 ha). The estimated current extent of the mapped important habitat of 173,984 ha in the locality of the project.

The BDAR assessed a direct impact to 116.18 ha of foraging habitat for the Regent Honeyeater, largely in disturbed environments adjacent to existing mines and infrastructure. In response to BCS advice on the Response to Submissions Report the area of impact was increased to 132.58ha to reflect the mapped important habitat.

The impact will occur at the fringe of large areas of mapped important habitat within the National Parks Estate (mapped as “important habitat” as per green shading in **Appendix B**).

This is given the highly mobile nature of the species and the extensive areas of adjoining and better quality habitats mapped as important areas, including significant areas of securely reserved National Parks Estate and known past and current breeding locations.

Refer to **Appendix C** showing the mapped important habitat of the Regent Honeyeater in proximity to the project. The extent of impact is highlighted in red, with **Table 3-2** providing the area of impact as a percentage of the current geographic extent of the species habitat.

Table 3-2 Impact to Regent Honeyeater habitat

Assessment criteria	Estimated area	% of assessment area impacted (direct impacts)	% of assessment area impacted (direct and partial impacts)
Extent of occurrence (EOO)	60,000,000	<0.001%	<0.001%
Area of occurrence (AOO)	30,000	0.146%	0.389%
Mapped important areas	173,984	0.025%	0.067%

3.2 Mining Offsets

The project traverses areas that were established as biodiversity offsets in accordance with the development consents for Wilpinjong, Moolarben and Ulan coal mining operations. The location of the project across each of the mining offsets is shown in **Figure 3-1**, **Figure 3-2** and **Figure 3-3** for Wilpinjong, Moolarben and Ulan mines, respectively.

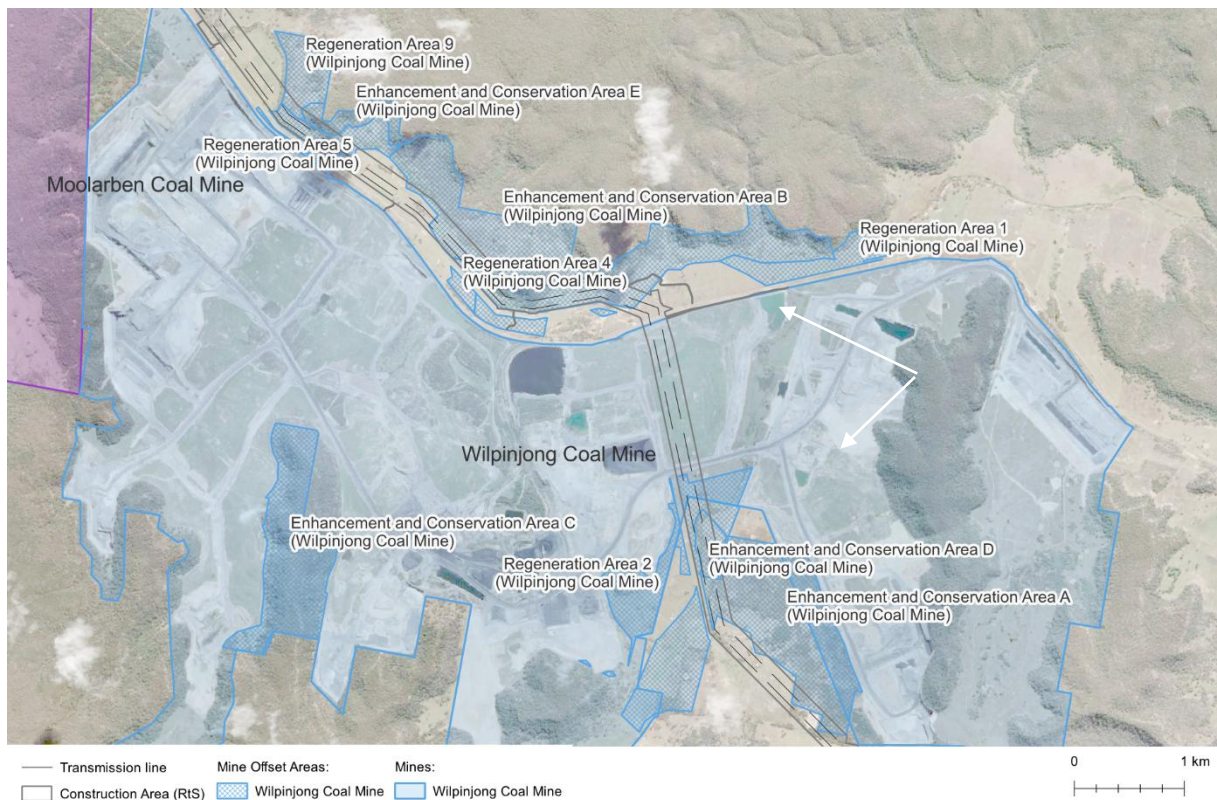


Figure 3-1 Wilpinjong mine offsets

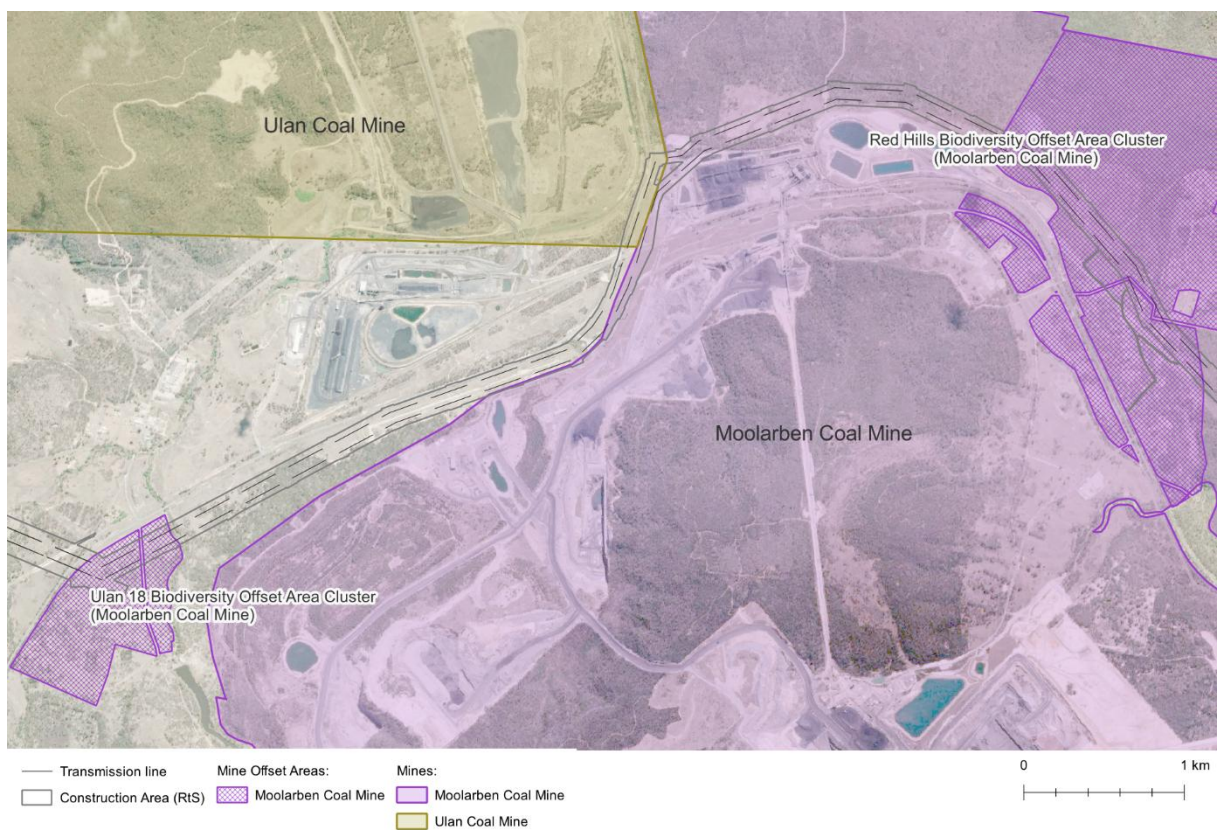


Figure 3-2 Moolarben mine offsets

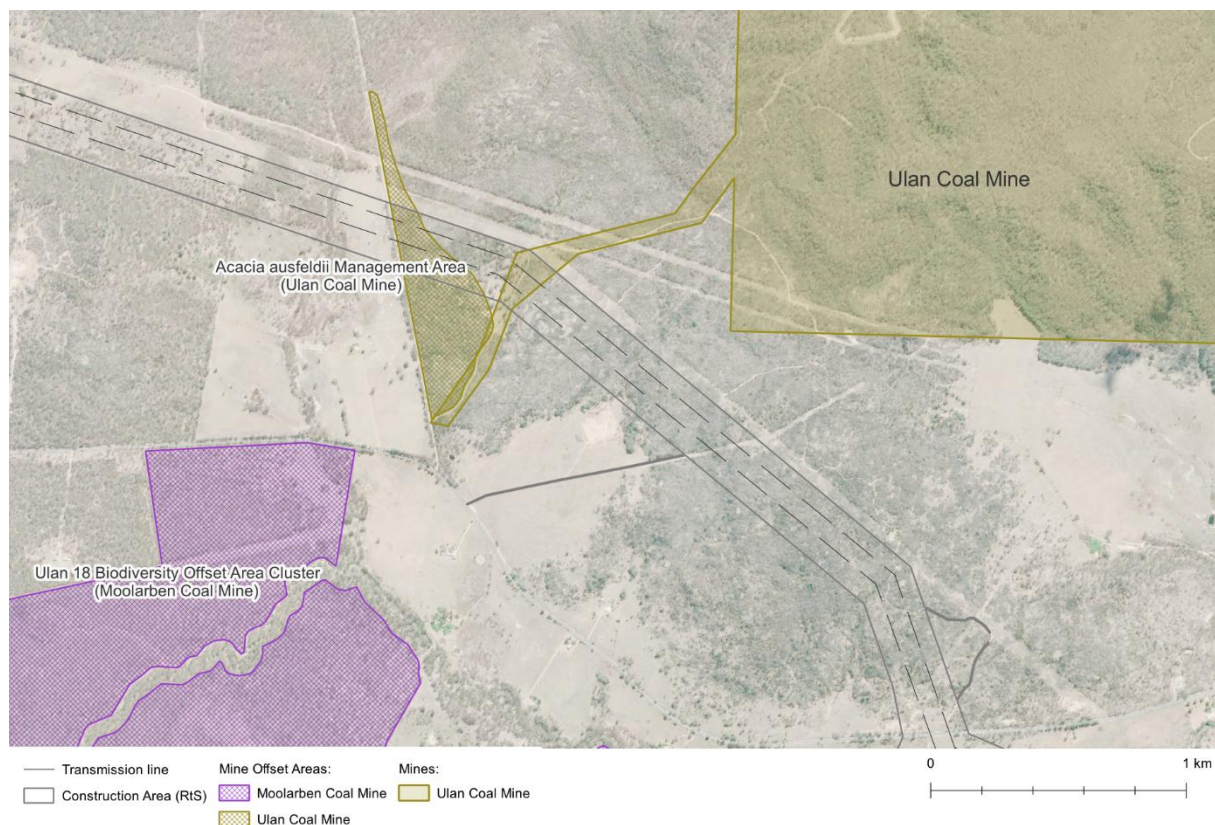


Figure 3-3 Ulan mine offset

The extent of vegetation clearing within each of the five biodiversity offsets is summarised in **Table 3-3** below.

Table 3-3 Project impacts to mining offsets

Mining Operations & operator	Name of offset area impacted by Project	Project clearing requirements (ha)
Moolarben coal mine (YanCoal)	Property 24/25	11.27
	Red Hills Cluster	29.40
Peabody – Wilpinjong coal mine (Peabody)	Enhancement and conservation	54.04
	Regeneration	15.04
	Rehabilitation offset	21.52
Ulan coal mine (Glencore)	<i>Acacia ausfeldii</i> offset	4.35
Total impact to mining offsets by Project		135.62

The development consents for Moolarben and Wilpinjong coal mines required minimum areas to be protected in perpetuity with broad requirements to regenerate and revegetate native vegetation and to provide wildlife corridors to national park estate.

For the Ulan coal mine, the development consent only included a specific requirement to provide long term security for the stand of *Acacia ausfeldii* along the eastern side of Highett Road.

Biodiversity surveys were carried out in accordance with the Biodiversity Assessment Method and identified eleven PCTs in varying condition within the mining offset areas. The surveys also confirmed the presence of *Acacia ausfeldii* within the *Acacia ausfeldii* offset area for the Ulan coal mine. The extent of each PCT, and the condition type, is illustrated in Figure 14-9 of the BDAR.

4. Measures

4.1 Serious and Irreversible Impacts

As noted, Section 8.6 of the BDAR described the additional measures that were proposed for unavoidable impacts to Box Gum Woodland and Regent Honeyeater SAI entities.

The additional measures were derived using a land-based ratio that generated an additional 130.75 hectares of Box Gum Woodland and an additional 116.18 hectares of the Regent Honeyeater habitat to be protected in perpetuity.

4.1.1 Box Gum Woodland

Following lodgement of the revised BDAR in March 2024, and in response to BCS and DPHI feedback (the Additional Information), EnergyCo increased the additional area of Box Gum Woodland to 167 hectares. This was documented in the additional information letter dated 14 June 2024. The area was based on the average vegetation integrity score (VIS) for each condition class across all plant community types associated with Box Gum Woodland using the following formula:

$$\text{Compensation area} = \text{area of impact} \times \frac{VIS}{100}$$

The Assessment Report acknowledges that this formula is a reasonable method for providing additional measures for Box Gum Woodland but noted the 167 hectares was only based upon direct impacts. DPHI required partial impacts to be included, but at a lower rate (equivalent area to 50% of VIS score), which increased the additional area to 241.16 hectares as shown in **Table 4-1**.

Table 4-1 Additional measures for Box Gum Woodland

Condition	Area of impact (ha)	Impact type	Average VIS score	Compensation area (ha)
Excellent	11.2	Direct	90.5	10.14
Mod-good	37.47	Direct	80.4	30.13
Thinned	77.94	Direct	67.9	52.95
Poor	3.16	Direct	32.8	1.04
Regrowth shrubland	0.78	Direct	79.4	0.62
Derived native grassland	221.76	Direct	32.6	72.31
Excellent	26.36	Partial	90.5	11.93
Mod- good	59.68	Partial	80.4	24.20
Thinned	108.64	Partial	67.9	37.13
Poor	4.37	Partial	32.8	0.72
Regrowth shrubland	0	Partial	79.4	0.00

Condition	Area of impact (ha)	Impact type	Average VIS score	Compensation area (ha)
Derived native grassland	0	Partial	32.6	0.00
Total:				241.16

Accordingly, condition B26(d)(xi) of the NSW Approval includes a requirement to ensure an additional area of 241.16 hectares of Box Gum Woodland is conserved within a Biodiversity Stewardship Agreement within 3 years (of the NSW Approval).

The management actions of the Biodiversity Stewardship Agreement will include the protection and regeneration of derived grassland areas, addressing and attempting to reverse the principles under which Box Gum Woodland is listed to be at risk of serious and irreversible impacts, including:

Overstorey Species Planting:

- Planting native canopy species characteristic of Box Gum Woodland to restore degraded areas.
- Enhancing habitat connectivity through strategic overstorey plantings.

Restoration of Remnants and Derived Native Grasslands:

- Implementing targeted restoration measures, including weed control and soil health improvement.
- Encouraging native understory regeneration to improve the ecological condition of degraded areas.

Implementation of Best Practice Management:

- Employing fire management practices tailored to maintain ecological balance.
- Reducing grazing pressure to support regeneration efforts.
- Conducting long-term monitoring to evaluate and ensure the success of restoration initiatives.

Focus on Avoidance:

- Prioritising the selection of BSA sites with the highest restoration potential, ensuring critical biodiversity values are safeguarded rather than impacted.
- Through the integration of these management measures, EnergyCo demonstrates a strong commitment to addressing the SAI Principles. By planting overstorey species, restoring remnants, implementing best practices, and selecting high-potential BSA sites, the project contributes significantly to the protection and recovery of Box Gum Woodland. These efforts ensure alignment with Principles 1 and 2, fostering the long-term resilience and sustainability of this ecological community.

4.1.2 Regent Honeyeater

In response to BCS feedback on the BDAR, EnergyCo increased the commitment for Regent Honeyeater habitat that would be secured as an additional measure.

The initial Biodiversity Offset Package that was included in the additional information letter dated 14 June 2024 (the Additional Information) increased the area of impact to Regent Honeyeater habitat 132.58 hectares. Therefore, applying the 1:1 impact area ratio generates an equivalent 132.58 hectares of Regent Honeyeater habitat that needs to be secured.

Accordingly, condition B26(d)(xi) of the NSW Approval requires 132.58 hectares to be conserved within a Biodiversity Conservation agreement within 3 years (of the NSW Approval).

The additional Regent Honeyeater habitat would minimise impact by focusing on the conservation of habitat and attempting to reverse the principles under which Regent Honeyeater is listed to be at risk of SAIL.

4.2 Mining offsets

Determining the appropriate offsets for impacts to the existing mining offset areas is outside of the scope of the Biodiversity Assessment Method. EnergyCo recognises the need to provide alternative offsets that provide improved conservation outcomes from the current mine offset commitments.

Accordingly, a land-based ratio offset package has been developed that takes into account the existing condition of the offsets and the broad objectives of the development consents. EnergyCo has purchased a property located adjacent to Goulburn River National Park for the purpose of creating BSAs or to function as additional reserve estate under agreement with NPWS.

The land-based ratio would deliver improved conservation outcomes from the current mine offset commitments and potentially contribute to regional connectivity to the reserve estate by providing the following, based on the plant community types (PCTs) that the project will impact within the mine offset areas:

- remnant vegetation (moderate to good condition) at 1:1 ratio
- derived native grasslands (or poor condition vegetation) at 1:1
- additional areas for higher conservation value (Box Gum Woodland) impacts in remnant condition at 2:1 ratio.

The proposed ratios quoted in the additional information dated 14 June 2024 and Assessment Report form part of the approved project and are EnergyCo's obligations concerning the replacement mine offset areas. It is noted section 8.6.4.4 of the BDAR included commitments around the ratio to be applied at an alternative land-based offset, where: Vegetation at the alternative offset site was in good condition, it would be on a 1:1

ratio to the area being impacted, and/or Vegetation at the alternative offset was in derived or poor condition it would be on a 2:1 ratio to the area being impacted, and/or the vegetation being impacted was Box Gum Woodland TEC in remnant condition, the alternative offset vegetation would be at a ratio of 2:1.

EnergyCo proposes to increase the size of the replacement offset to cover all land Highett Road *Acacia ausfeldii* Management Area for the Ulan mine that is available to the project for construction. This increase is proposed as the exact alignment and disturbance footprint through the *Acacia ausfeldii* Management Area is not yet known, and the larger extent will make the required amendment to the associated conservation agreement easier to action. Table 4-2 indicates the contributions from the Highett Road *Acacia ausfeldii* Management Area to the total replacement offset commitment, as assumed in the EIS, and the revised commitment included in this plan.

EnergyCo notes that this will not increase the size of the disturbance footprint in this Management Area, only the size of the replacement offset.

Table 4-2 Increase replacement offset commitment for High Road *Acacia ausfeldii* Management Area (Ulan mine)

PCT	Replacement offset commitment (ha)		
	EIS-assumed	Revised	Change ¹
0	0.15	0.15	-0.01
479	2.61	3.35	+0.73
481	1.58	1.49	-0.09
Total:	4.35	4.99	+0.64

Note:

1 Slight difference due to rounding to two decimals places

In addition to the PCT impacts, the project would impact an *Acacia Ausfeldii* Management Area associated with the Ulan mine (refer to **Figure 3-3**). EnergyCo would secure a commensurate offset to replace the habitat for this species within the management area that the project would impact. The proposed increase in the replacement offset commitment for the Highett Road *Acacia ausfeldii* Management Area described above will increase overall commitment for a replacement offset for the *Acacia ausfeldii* from 4.35 to 4.99 hectares. This increase will occur in consultation with Glencore (the mine operator) and BCT.

5. Implementation

In partnership with NSW National Parks and Wildlife Services (NPWS), EnergyCo has acquired two properties to support meeting the project's offset requirements. The first property is in Ulan and located adjacent to the Goulburn River National Park. It was purchased primarily for to deliver the mining offsets, and with the intention of transferring the land to NPWS to manage in perpetuity. The second property is in Mt Marsden and located adjacent to the Capertee National Park. It was purchased primarily for the Regent Honeyeater, and with the same intention of transferring the land to NPWS to manage in perpetuity.

Both properties contain biodiversity values that will be utilised for the project's credit liability. The biodiversity values used to offset the project's credit liability will not be used for mining offsets or SAI additional measures. In other words, there is no double up.

5.1 Measures

5.1.1 SAI – Regent Honeyeater

The Mt Marsden property, referred to as the Home Hills Offset in the Biodiversity Offset Package, has a total area of 1644 hectares and located adjacent to Capertee National Park. The property was purchased by EnergyCo as it was identified by NPWS as containing a breeding population of the Regent Honeyeater. Establishing the property as a conservation site will result in the protection and conservation of over 1400 hectares of known habitat of the critically endangered Regent Honeyeater, including one of the most significant breeding sites for the species. Refer to **Appendix C** which displays the Regent Honeyeater important habitat present on the Home Hills Offset.

Biodiversity surveys carried out on the property to support preparation of the Biodiversity Stewardship Site Assessment Report (BSSAR) for the Home Hills Offset confirmed the presence of 1471.10 hectares of Regent Honeyeater habitat. Taking into account the 132.58 hectares needed for the additional and appropriate measures (per condition B26(d)(ix)), the property still provides a residual 1,338.52 hectares of Regent Honeyeater habitat, which equates to 6,086 species credits. The project's offset liability for Regent Honeyeater is 4,606 credits.

Active restoration efforts will be implemented within the Home Hills Offset to enhance the Regent Honeyeater habitat. These efforts will target areas within the Box Gum Woodland present on the site and adjacent non-Box Gum Woodland habitats deemed critical or supplementary for the conservation of the species. In total, 75.9 hectares within Home Hills will be subject to restoration activities.

The restoration program is designed to improve and enhance habitat quality for the Regent Honeyeater and bolster the ecological resilience of the site. Specific measures include the removal and control of invasive plant species to facilitate the regeneration of native understory vegetation. Strategic planting of native canopy species will provide essential nectar and foraging resources. Maintenance and enhancement of existing habitat corridors will improve movement and connectivity through the linking of patches of vegetation for the Regent Honeyeater. To protect regenerating vegetation, fencing and exclusion zones will be implemented. Additionally, erosion control measures and the application of organic materials will be used to improve soil structure and promote successful plant establishment.

These actions aim to create a sustainable and thriving habitat for the Regent Honeyeater while improving the overall ecological function of the site. The implementation of these measures will be monitored and adjusted as needed to ensure alignment with the conservation objectives of the BMP.

In addition, the property's proximity to Capertee National Park significantly enhances the connectivity across the landscape and strengthens the local conservation value.

5.1.2 SAI – Box Gum Woodland

In developing the biodiversity offset measures for the project, the Nature Markets and Offsets Division of BCS identified three regions in proximity to the project that contain opportunities to conserve Box Gum Woodland, and with connectivity benefits. EnergyCo would continue to work with Nature Markets and Offsets Division to identify a suitable opportunity to establish a biodiversity stewardship for this purpose.

The Mt Marsden property referred to above has around 405 hectares of Box Gum Woodland. The BSA would conserve more than the 241.16 hectares of Box Gum Woodland required by condition B26(d)(xi). EnergyCo, however requires extensive areas of Box Gum Woodland to address the project's credit liability, which it must address within two years of the NSW Approval. Condition B26(d)(xi), however, allows three years to secure the additional 241.16 hectares of Box Gum Woodland. EnergyCo will decide, at later date based on project need, whether to secure the additional 241.26 hectares of additional Box Gum Woodland within the Home Hills Offset or another BSA site it is pursuing. Importantly the additional 241.16 hectares secured to address the relevant requirement of condition B26(d)(xi) would not be used to offset the project's credit liability.

5.1.3 Mining offsets

The Ulan property referred to as the Ulan Offset in the Biodiversity Offset Package, is 643 hectares and located adjacent to Goulburn River National Park. The property contains predominantly native vegetation with around 80 hectares of Box Gum Woodland and around 40 hectares needing targeted restoration.

EnergyCo has been in discussions with NPWS regarding the potential transfer of this land and management of the targeted restoration efforts. Part of the Ulan Site includes

an area under exploration licence EL6288, held by Moolarben Coal Mines Pty Ltd and renewed through August 2029, which may limit its suitability for reservation as part of the Goulburn River National Park. Recognising this, EnergyCo has proposed reserving the area as a State Conservation Area (SCA), an approach that aligns with regional land management practices. Ongoing discussions with NPWS are exploring this alternative, along with potential partnerships with other organisations or private entities interested in assuming conservation management responsibilities. EnergyCo remains committed to securing a viable offset solution that aligns with the project's biodiversity obligations and supports long-term conservation objectives. If an agreement is not reached with NPWS, EnergyCo will manage the property directly in accordance with BSA obligations or on-sell the property to a party that will do the same.

Table 5-1 outlines the contribution of the property for the mining offsets based upon the biodiversity values present and above ratios. The table also outlines the contribution of the property as an offset for the project, separate to the mining offsets.

In alignment with Clause 6.2 of the Biodiversity Conservation Regulation 2017, offset selection is governed by the like-for-like offset rules within the Offset Trading Groups (OTGs), as mandated by the Biodiversity Assessment Method (BAM). These rules are applied to achieve ecological equivalency, ensuring the selected offsets are within the same OTG to retain ecosystem integrity and function. By choosing offsets that match the impacted PCT within the same OTG, the project can meet requirements for ecological similarity, functional compatibility, and compliance with regulatory obligations. Table 5-1 indicates that the Ulan Offset provides substantial extents of PCT 478, PCT 479, PCT 418 and PCT 1610 that are more than what is required to provide replacement offsets per the land-based ratios. Under like-for-like rules, these PCTs are more than adequate to provide the replacement offsets for PCTs like 281, 401, 468 and 618 that are present within project impacted area in the mine offset areas but are not present in the Ulan Offset.

It should be noted that PCT 0 within the mine offset area (referred to in this plan as PCT 0 – Rehabilitation) is not aligned with any vegetation type and represents rehabilitation areas that aim to restore ecological functions. Vegetation types are present within the Ulan Offset with suitable vegetation structure, species composition, and habitat connectivity. **Table 5-1** indicates that there is a substantial excess (more than 366 hectares) of PCT 479 within the Ulan Offset. PCT 479 is appropriate to use to offset PCT 0 – Rehabilitation due to its alignment with the ecological characteristics and functional requirements of the intended rehabilitation outcomes. PCT 479 provides the necessary habitat values and aligns within the same Offset Trading Group (OTG) as required by the Biodiversity Assessment Method (BAM). This alignment ensures that PCT 479 supports equivalent ecological functions, contributing to the rehabilitation objectives. Additionally, PCT 489's selection maintains landscape connectivity around high-value conservation areas, such as the Goulburn River National Park, which supports broader biodiversity and conservation goals.

In summary, 75.5% of mine offset liability is met by the Ulan offset. The residual 24.5% relates to 44.31 hectares of Box Gum Woodland, which will be addressed through the purchase of equivalent areas of credit (6 credits per hectare), if not secured through additional potential BSA sites that EnergyCo is currently pursuing to address the projects credit liability.

Concerning the commitment to provide a replacement offset equivalent to 4.99 hectares of project impact within the *Acacia ausfeldii* Management Area associated with the Ulan coal mine (Glencore), *Acacia ausfeldii* has been surveyed and confirmed at one of the potential BSA sites that EnergyCo is currently pursuing. If established, EnergyCo proposes to use this site to secure the replacement offset impacts for project impacts in the *Acacia ausfeldii* Management Area. Alternatively, EnergyCo could secure this replacement area through another BSA, purchase and retire species appropriate species credits (if available on the credit market) or make an equivalent payment into the Biodiversity Conservation Fund (20 credits at 4 credits per hectare – per the *additional information dated 14 June 2024* that forms part of the EIS by definition). EnergyCo notes that payment into the Biodiversity Conservation Fund would be adopted as a last resort only, if the required replacement area cannot be secured through BSAs or credit purchase and retirement before the relevant date (refer to section 5.2).

Table 5-1 Mining offsets contributions

Plant Community Type (PCT)	Project clearing within mine offset areas (ha)				Total extent to be cleared (ha)	Offset commitment (including 2:1 ratio for remnant Box Gum Woodland) (ha)	Extent within Ulan offset (ha) ¹	Contribution to mine offset ²
	YanCoal - Moolarben coal operations	Peabody – Wilpinjong coal operations	Peabody – Rehabilitation offset	Additional species area for Glencore - Ulan coal operations				
PCT 0 – Rehabilitation	1.77	6.32	21.52	0.15	29.76	29.76	-	29.76 ^{2,5}
PCT 281 – Rough-barked Apple - Red Gum - Yellow Box woodland on alluvial clay to loam soils on valley flats in the northern NSW South western slopes Bioregion and Brigalow Belt South Bioregion ^{3,4,6}	4.07	16.36	-	-	20.43	40.86	-	-
PCT 281 – DNG ^{3,4,7}	6.98	20.38	-	-	27.36	27.36	-	-
PCT 401 – Rough-barked Apple – Blakely's Red Gum – Black Cypress Pine woodland on sandy flats, mainly in the Pilliga Scrub region ^{3,4,6}	16.8	-	-	-	16.80	33.59	-	-

Plant Community Type (PCT)	Project clearing within mine offset areas (ha)				Total extent to be cleared (ha)	Offset commitment (including 2:1 ratio for remnant Box Gum Woodland) (ha)	Extent within Ulan offset (ha) ¹	Contribution to mine offset ²
	YanCoal - Moolarben coal operations	Peabody – Wilpinjong coal operations	Peabody – Rehabilitation offset	Additional species area for Glencore - Ulan coal operations				
PCT 468 – Narrow-leaved Ironbark – Black Cypress Pine +/- Blakely's Red Gum shrubby open forest on sandstone low hills in the southern Brigalow Belt South Bioregion (including Goonoo)	5.59	-	-	-	5.59	5.59	-	-
PCT 478 – Red Ironbark – Black Cypress Pine – stringybark +/- Narrow-leaved Wattle shrubby open forest on sandstone in the Gulgong – Mendooran region, southern Brigalow Belt South Bioregion	-	6.04	-	-	6.04	6.04	27.3	6.04

Plant Community Type (PCT)	Project clearing within mine offset areas (ha)				Total extent to be cleared (ha)	Offset commitment (including 2:1 ratio for remnant Box Gum Woodland) (ha)	Extent within Ulan offset (ha) ¹	Contribution to mine offset ²
	YanCoal - Moolarben coal operations	Peabody – Wilpinjong coal operations	Peabody – Rehabilitation offset	Additional species area for Glencore - Ulan coal operations				
PCT 479 – Narrow-leaved Ironbark – Black Cypress Pine – stringybark +/- Grey Gum +/- Narrow-leaved Wattle shrubby open forest on sandstone hills in the southern Brigalow Belt South Bioregion and Sydney Basin Bioregion	1.77	-	-	3.35 ⁸	5.12	5.12	370.5	5.12 ⁹
PCT 481 – Rough-barked Apple – Blakely's Red Gum – Narrow-leaved Stringybark +/- Grey Gum sandstone riparian grass fern open forest on in the southern Brigalow Belt South Bioregion and Upper Hunter region	3.7	-	-	1.49 ⁸	5.19	5.19	80.5	5.19

Plant Community Type (PCT)	Project clearing within mine offset areas (ha)				Total extent to be cleared (ha)	Offset commitment (including 2:1 ratio for remnant Box Gum Woodland) (ha)	Extent within Ulan offset (ha) ¹	Contribution to mine offset ²
	YanCoal - Moolarben coal operations	Peabody – Wilpinjong coal operations	Peabody – Rehabilitation offset	Additional species area for Glencore - Ulan coal operations				
PCT 483 – Grey Box x White Box grassy open woodland on basalt hills in the Merriwa region, upper Hunter Valley ^{3,4}	-	-	-	-	-	-	76.6	76.6
PCT 599 – Blakely's Red Gum – Yellow Box grassy tall woodland on flats and hills in the Brigalow Belt South Bioregion and Nandewar Bioregion ^{3,4}	-	-	-	-	-	-	4.2	4.2
PCT 618 – White Box Grey Box – red gum – Rough-barked Apple grassy woodland on rich soils on hills in the upper Hunter Valley ^{3,4,6}	-	8.19	-	-	8.19	16.39	-	-
PCT 618 – DNG ^{3,4,7}	-	6.93	-	-	6.93	6.93	-	-
PCT 1610 – White Box – Black Cypress Pine shrubby woodland of the Western Slopes	-	4.86	-	-	4.86	4.86	30.9	4.86

Plant Community Type (PCT)	Project clearing within mine offset areas (ha)				Total extent to be cleared (ha)	Offset commitment (including 2:1 ratio for remnant Box Gum Woodland) (ha)	Extent within Ulan offset (ha) ¹	Contribution to mine offset ²
	YanCoal - Moolarben coal operations	Peabody – Wilpinjong coal operations	Peabody – Rehabilitation offset	Additional species area for Glencore - Ulan coal operations				
PCT 1661 – Narrow leaved Ironbark – Black Pine – Sifton Bush heathy open forest on sandstone ranges of the upper Hunter and Sydney Basin	-	-	-	-	-	-	53.5	-
Total Box Gum Woodland	27.84 (20.87 ⁶ / DNG 6.98 ⁷)	51.86 (24.55 ⁶ / DNG 27.21 ⁷)	-	-	79.7 (Peabody 24.55 ⁶ and Moolarben 20.87 ⁶ / Peabody 27.31 ⁷ and Moolarben 6.98 ⁷)	125.11 (Peabody 49.10 ⁶ and Moolarben 41.74 ⁶ / Peabody 6.98 ⁶ and Moolarben 27.31 ⁶)	80.8	80.8
Total vegetation (all PCTs)	40.67	69.08	21.52	4.99	135.61	181.02	643.5	136.71

Notes:

1 Subject to final surveys

2 Like for like and/or equivalent PCT in the same OTG in accordance with the BAM

3 White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South East Corner and Riverina Bioregions – Critically Endangered Ecological Community

4 White Box- Yellow Box Blakey's Red Gum Grassy Woodland and Derived Native Grassland – Critically EEC

5 Areas of PCT 0 will be offset with surplus remnant PCT 479 available from within the Ulan Offset

6 High conservation value Box Gum Woodland and Excellent, Mod-Good, Thinned condition classes

7 Cleared and low conservation value Box Gum Woodland in Derived Native Grassland and Regrowth Shrubland condition classes

8 Includes a revised replacement offset commitment associated with Hightett Road Acacia ausfeldii Management Area (Ulan mine)

9 PCT 479 alternative is acceptable under the BAM Variation rules, with the proposed offset adequately meeting the original mining offset requirements

5.2 Timing

The additional areas of Regent Honeyeater habitat and Box Gum Woodland would be secured within three years of the NSW approval (i.e., by 26 June 2027) per the requirements of condition B26(d)(xi).

Condition B26(d)(xii), which requires appropriate replacement of mine offsets, contains no specific timing obligations. As the conservation outcomes required by condition B22 and condition B26(d)(xi) would also provide the required replacement mine offsets, EnergyCo commits to complying with condition B26(d)(xii) by 26 June 2027 (three years from NSW approval).

EnergyCo is actively pursuing the BSAs that will secure the required additional and appropriate measures and the replacement offsets. Depending on the outcomes of that process, the final suite of measures might be subject to some change but would still be in accordance with the protocols set out in this plan.

The Home Hills Biodiversity Stewardship Site Assessment Report (BSSAR) has advanced significantly, with final reviews and credit finalisation targeted for completion by February 2025. This milestone marks a key point in securing the offsets needed for the project. Based on current progress, EnergyCo anticipates that the BSA will be established in Q1 2025.

Similarly, the Ulan BSSAR is underway, with a pre-lodgement meeting scheduled for Q4 2024, and submission is anticipated shortly thereafter. Based on current progress, EnergyCo anticipates that the BSA will be established in Q2 2025.

This timeline underscores EnergyCo's commitment to securing required biodiversity offsets promptly and proactively, ensuring project compliance and facilitating environmental stewardship.

5.3 Monitoring and reporting

EnergyCo will track and monitor the progress with delivering the additional and appropriate measures for the SAI entities and the replacement mine offsets areas, as described in this plan, in regular EnergyCo project environment team meetings and regular project biodiversity offsets meetings.

The Offset Measures BMP will be revised at specific stages to reflect progress toward achieving biodiversity stewardship and offset requirements:

- **Post-Condition B24 Surveys:** After the targeted surveys for *Indigofera efoliata* and *Euphrasia arguta* (expected by the end of 2024), EnergyCo will review the findings in relation to the matters covered in this plan. This plan will be updated (as necessary) to incorporate all data related to Condition B24, including any adjusted offset requirements relevant to this plan based on survey findings.

- **Biodiversity Assessment Verification Report (condition B25):** the outcomes of this requirement might change vegetation biodiversity value mapping within the mining offsets areas, particularly in relation to PCT 0, derived native grassland and Box Gum Woodland. Once the Biodiversity Assessment Verification Report is approved, EnergyCo will review the outcomes, identify if any changes to this Offset Measures Biodiversity Management Plan are required and amend the plan (as necessary)
- **Finalisation of Ulan BSA:** when BSSAR for the Ulan BSA is finalised and the BSA is executed, this Offset Measures Biodiversity Management Plan will be updated as necessary to capture the measures to regenerate and enhance areas of Box Gum Woodland and habitat for Regent Honeyeater.

EnergyCo will pursue the BSAs referred to in this plan through the project's Biodiversity Offset Package, prepared per condition B22. The commitments and requirements of the Offset Measures Biodiversity Management Plan will be considered in the final credit reconciliation process proposed as part of the Final Biodiversity Offset Package.

Once the additional and appropriate measures for the SAll entities and the replacement mine offsets have been secured, EnergyCo will prepare a compliance statement, which will include appropriate supporting evidence, and provide it to the Planning Secretary (via the Major Projects website) as part of notification of compliance. EnergyCo will also publish the compliance and associated evidence of the project website (per condition C17(a)(iv)).

Appendix A Box Gum Woodland distribution in the project locality

Appendix B Regent Honeyeater distribution in the project locality

Appendix C Regent Honeyeater important habitat present on the Home Hills Offset