CBH Kellerberrin Rail Out loading Project

Application Number: **02852** Commencement Date: **31/03/2025** Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

CBH Kellerberrin Rail Out loading Project

1.1.2 Project industry type *

Agriculture and Forestry

1.1.3 Project industry sub-type

Agriculture

1.1.4 Estimated start date *

01/02/2026

1.1.4 Estimated end date *

29/02/2028

1.2 Proposed Action details

1.2.1 Provide an overview of the proposed action, including all proposed activities. *

Co-Operative Bulk Handling Limited (herein 'CBH') is Australia's largest cooperative and a leader in the Australian grain industry, with operations extending along the value chain from fertiliser to grain storage, handling, transport, marketing, and processing. Owned and controlled by approximately 3,700 Western Australian grain-growing businesses, the core purpose of CBH is to sustainably create and return value to growers. Its storage and handling system currently receives and exports around 90% of the Western Australian grain harvest. The CBH network of grain receival sites and port terminals distributed across southern Western Australia are shown in **(Att. 1, Figure 1)**.

The Kellerberrin Rail Project (herein the 'Proposed Action') relates to the extension of the existing CBH rail siding adjacent to the CBH Kellerberrin Grain Receival Site **(Att. 1, Figure 2a-d)**.

The extension will cover 6.04 ha (the 'Project Area') and comprises a Disturbance Footprint of 6.01 ha and an Avoidance Area of 0.03 ha **(Att. 1, Figure 3)**. This will allow the siding to safely and efficiently load trains with up to 88 wagons without impeding the mainline. This expansion is required for the CBH Kellerberrin site to meet projected industry growth.

In addition to expanding the Kellerberrin facilities' export capacity, the Proposed Action will also reduce the number of grain trucks required to travel between the facility and the port at Kwinana, where the grain is exported offshore. This will cause a reduction in noise pollution and provide positive outcomes for emission generation, road safety and overall transport costs for CBH.

The Proposed Action will initially require earthworks, including vegetation clearing, ground leveling, and compaction, to ensure that the rail line meets required construction standards and gradient constraints. Due to the proximity of the existing high-usage rail mainline, the Proposed Action is unlikely to require a large amount of cut and fill activities.

The construction of the rail line itself will require the laying of ballast, which will be transported to the site, followed by the installation, and levelling of rain sleepers. The rails themselves will also be transported to the site in 20 m length and welded in place. The main access track will be unsealed with a width of a narrow single lane (5-6 m) and will be constructed from compacted sand material. Additional items such as signage and rail signals will also be installed as part of the Proposed Action.

Multiple existing drains and culverts exist within the rail corridor and along the existing access road to the CBH Kellerberrin site. The Proposed Action will require the construction of additional culverts and drains to assist with water management and tie in with the existing drainage network.

1.2.2 Is the project action part of a staged development or related to other actions or proposals in the region?

No

1.2.6 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed action, and how are they relevant? *

Commonwealth Legislation

Environment Protection and Biodiversity Conservation Act 1999

The Project Area contains environmental values identified as Matters of National Environmental Significance (MNES) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and potentially impacted by the Proposed Action. These MNES are:

- the Eucalypt Woodlands of the Western Australian Wheatbelt Threatened Ecological Community (herein 'Wheatbelt Woodlands TEC'; Critically Endangered)
- potential habitat for the Carnaby's Black Cockatoo (*Zanda latirostris*; Endangered).

The presence of these MNES within the Project Area prompted CBH to refer the Proposed Action to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) for assessment under the EPBC Act.

State Legislation

Environmental Protection Act 1986

Within Western Australia, native vegetation can only be cleared in accordance with a Native Vegetation Clearing Permit (NVCP) granted under Part V Division 2 of the *Environmental Protection Act 1986* (EP Act), or approved under Part IV of the EP Act, except in limited circumstances where exemptions apply. These exemptions are outlined in Schedule 6 of the EP Act and the Environmental Protection (Clearing of Native Vegetation) Regulation 2004. As none of these exemptions apply to this Proposed Action, CBH will obtain an NVCP from the Department of Water and Environmental Regulation (DWER) prior to any clearing activities being undertaken.

Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) recognises that activities approved under an EP Act approval (i.e. an NVCP), such as the taking of flora and fauna (other than threatened species) or disturbing of fauna (including threatened species), do not require approval under the BC Act, if they are undertaken in accordance with any biodiversity conservation conditions, such as within the authority of an NVCP or in line with a Part IV approval.

However, any threatened flora that is to be taken or cleared for a proposed development requires authorisation under s 40 of the BC Act. As threatened flora species have not been recorded within the Project Area, this authorisation is not relevant to the Proposed Action. The BC Act also requires authorisation from the Minister for the Environment to modify any TEC listed under the BC Act, regardless of any approvals under the EP Act. However, the Wheatbelt Woodlands TEC is only listed under the EPBC Act - as it has no equivalent State TEC listing under the BC Act this authorisation is not required.

Aboriginal Heritage Act 1972

The *Aboriginal Heritage Act 1972* (AH Act) includes provisions for the preservation of sites and objects customarily used by or traditional to the original inhabitants of Australia or their descendants. The act protects and manages Aboriginal heritage by requiring approval for activities that may impact or cause harm. .Any interactions with Aboriginal heritage within the Project Area will be conducted in accordance with the AH Act. There are no known Registered Aboriginal Sites or Other Heritage Places within the Project Area.

Policies and Guidance Documents

The following policies and guidance documents are of potential relevance to the Proposed Action and have been considered in undertaking the environmental impact assessment:

- Referral Guideline for 3 WA Threatened Black Cockatoo Species (***DAWE 2022***)

Approved Conservation Advice (including listing advice) for the Eucalypt Woodlands of the Western Australian Wheatbelt (***DoE 2015***).

1.2.7 Describe any public consultation that has been, is being or will be undertaken regarding the project area, including with Indigenous stakeholders. Attach any completed consultation documentations, if relevant. *

CBH undertook consultation with the Shire of Kellerberrin in February 2022, presenting the Shire with an overview of the Proposed Action, the benefits of the Proposed Action to the local community and CBH's long term outlook for operations within the Shire. The overall response from the Shire was positive, with some concerns being raised about the potential for the Proposed Action to damage the existing roads. However, these concerns were addressed by CBH's commitment to address any potential damage caused. CBH undertook further consultation with the Shire in January 2025 in anticipation of lodging a development application. The Shire were again supportive of the project with no major concerns.

Consultation was also undertaken with the South West Aboriginal Land and Sea Council in June, July and October 2022. An archaeological and ethnographical survey of the project area was undertaken in November 2022 with Traditional Owners nominated by the Ballardong Cultural Advice Committee. The survey found no new culturally significant sites, and the Traditional Owners gave their support for the project, with a recommendation that monitoring should be conducted by Ballardong elders during ground disturbance activities.

1.3.1 Identity: Referring party

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1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details

ABN/ACN	29256604947
Organisation name	CO-OPERATIVE BULK HANDLING LIMITED
Organisation address	6000 WA

Referring party details

Name	Andrew Black
Job title	Manager, Environment and Sustainability
Phone	+61 474 868 780
Email	andrew.black@cbh.com.au
Address	Level 6, 240 St George's Terrace Perth WA 6000

1.3.2 Identity: Person proposing to take the action

1.3.2.1 Are the Person proposing to take the action details the same as the Referring party details? *

Yes

Person proposing to take the action organisation details

ABN/ACN	29256604947
Organisation name	CO-OPERATIVE BULK HANDLING LIMITED
Organisation address	6000 WA

Person proposing to take the action details

Name	Andrew Black
Job title	Manager, Environment and Sustainability
Phone	+61 474 868 780
Email	andrew.black@cbh.com.au
Address	Level 6, 240 St George's Terrace Perth WA 6000

1.3.2.14 Are you proposing the action as part of a Joint Venture? *

No

1.3.2.15 Are you proposing the action as part of a Trust? *

No

1.3.2.17 Describe the Person proposing the action's history of responsible environmental management including details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the Person proposing to take the action. *

Under Western Australia's Environmental Protection (Unauthorised Discharges) Regulations 2004 (UDRs), it is an offence to cause or allow certain materials to enter the environment in connection with a commercial or business activity. The purpose of the UDRs is to cover discharges into the environment from business or commercial activities; which individually are not serious enough to cause pollution and breach the provisions of the Environmental Protection Act 1986 (EP Act), but cumulatively can cause harm (Department of Water and Environmental Regulation 2018a).

In 2019 and 2025, the Proponent received a modified penalty under the provisions of the Environmental Protection (Unauthorised Discharges) Regulations 2004 for an event where grain dust from ship loading activities was observed as settling on Cockburn Sound.

No other legal proceedings, Commonwealth or State, have been commenced or recorded against the Proponent.

1.3.2.18 If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework

CBH is committed to using resources responsibly to support the long-term sustainability of the global environment. It aspires to conduct business in a way that causes no harm to the health and safety of their staff and the community while minimising impact to the environment. CBH is committed to the following environmental objectives:

- compliance with all applicable environmental laws, regulations, and standards
- developing and implementing work practices and policies that promote environmental responsibility and continuous improvement
- creating an awareness of environmental issues through education and training
- consulting openly with government and the community where CBH operations may affect the environment and associated biodiversity
- establishing, implementing, and reviewing a risk management framework that will reduce the impact on the environment in the event of natural disasters or unforeseen accidents
- preventing soil, water, and air pollution
- considering the impact on the environment when designing new projects/concepts or changing existing practices
- reducing greenhouse gas emissions through energy and fuel efficiency programs and initiatives
- promoting and facilitating the reduction, reuse and recycling of waste.

CBH is committed to sustainability, with the vision of '*delivering value to all our stakeholders by protecting, sustaining and enhancing the natural resources needed for the future*'. CBH's Sustainability Policy enshrines company-wide commitment to corporate responsibility and sustainability and directs further change across all CBH activities. CBH's key sustainability objectives are:

- prevent harm to the environment
- strive to enhance the communities in which we operate in
- reduce greenhouse gas emissions
- integrate sustainable development principles
- implement sustainable consumption practices
- foster more sustainable behaviours and consumption patterns
- improve water use efficiencies and protect water quality
- reduce waste produced, maximise resource recovery and recycling
- improve diversity, equity and inclusion education and outcome for staff
- procure more wheatbelt located vendors
- increase sales of sustainably certified grain
- lead the industry in chemical residue traceability.

CBH's Environmental Management System (EMS) currently complies with ISO 14001:2015. The proposed action will be undertaken in accordance with both the CBH Health, Safety and Environment Policy (**Att. 2**), CBH's EMS, and the Sustainability Plan (***CBH Group 2025***). An overview of sustainability at CBH is provided in (**Att. 3)**.

1.3.3 Identity: Proposed designated proponent

1.3.3.1 Are the Proposed designated proponent details the same as the Person proposing to take the action? *

Yes

Proposed designated proponent organisation details

ABN/ACN	29256604947
Organisation name	CO-OPERATIVE BULK HANDLING LIMITED
Organisation address	6000 WA

Proposed designated proponent details

Name	Andrew Black
Job title	Manager, Environment and Sustainability
Phone	+61 474 868 780
Email	andrew.black@cbh.com.au
Address	Level 6, 240 St George's Terrace Perth WA 6000

1.3.4 Identity: Summary of allocation

Confirmed Referring party's identity

The Referring party is the person preparing the information in this referral.

ABN/ACN	29256604947
Organisation name	CO-OPERATIVE BULK HANDLING LIMITED
Organisation address	6000 WA
Representative's name	Andrew Black
Representative's job title	Manager, Environment and Sustainability
Phone	+61 474 868 780
Email	andrew.black@cbh.com.au
Address	Level 6, 240 St George's Terrace Perth WA 6000

Confirmed Person proposing to take the action's identity

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

Same as Referring party information.

Confirmed Proposed designated proponent's identity

The Person proposing to take the action is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

1.4 Payment details: Payment exemption and fee waiver

1.4.1 Do you qualify for an exemption from fees under EPBC Regulation 5.23 (1) (a)? *

No

1.4.3 Have you applied for or been granted a waiver for full or partial fees under Regulation 5.21A? *

No

1.4.5 Are you going to apply for a waiver of full or partial fees under EPBC Regulation 5.21A?

No

1.4.7 Has the department issued you with a credit note? *

No

1.4.9 Would you like to add a purchase order number to your invoice? *

No

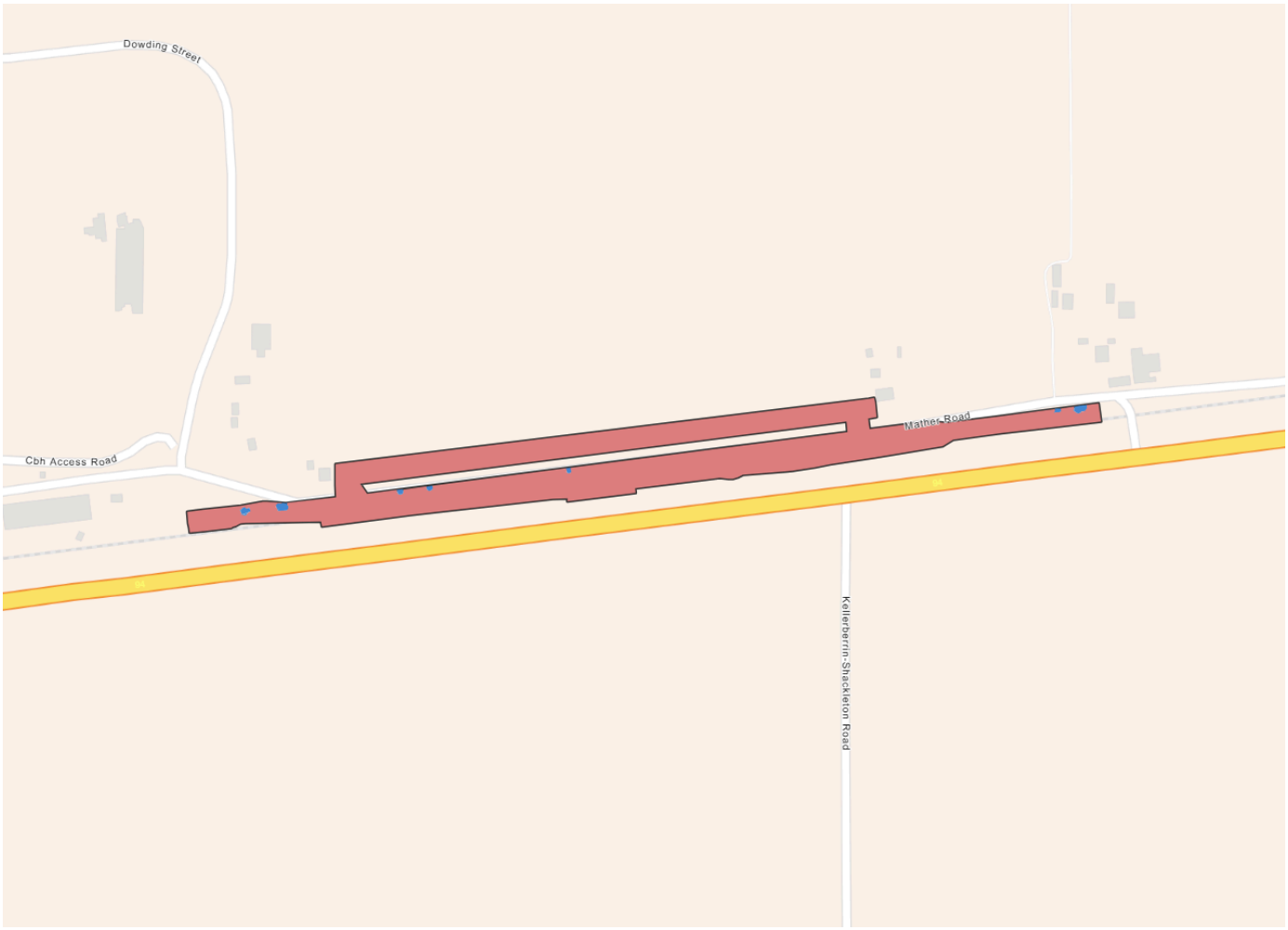
1.4 Payment details: Payment allocation

1.4.11 Who would you like to allocate as the entity responsible for payment? *

Proposed designated proponent

2. Location

2.1 Project footprint



Project Area: 6.03 Ha **Disturbance Footprint:** 5.98 Ha **Avoidance Area:** 0.05 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

128 Mather Road, Kellerberrin

2.2.2 Where is the primary jurisdiction of the proposed action? *

Western Australia

2.2.3 Is there a secondary jurisdiction for this proposed action? *

No

2.2.5 What is the tenure of the action area relevant to the project area? *

The Project Area intersects with the following land parcels:

- Private Property (Land ID: 1827269 and 1827268)
- Vacant Crown Land (Land ID: 3106899)
- Railway Corridor – Railway Reserve (Land ID: 3106898)
- Public Road – Road Reserve, Shire of Kellerberrin (Land ID: 3747509)

3. Existing environment

3.1 Physical description

3.1.1 Describe the current condition of the project area's environment.

The Project Area covers a total of 6.04 ha and has been historically subjected to impacts from surrounding land uses, including agriculture, urban development, and infrastructure construction. Obvious signs of these disturbances were noted during the 360 Environmental (2022) field survey, including weeds and litter (**Att. 4, Section 4.2.9, pg. 18**).

The condition of the vegetation within the Disturbance Footprint was mapped (**Att. 4, Section 4.1, pg. 12**) in accordance with the Environmental Protection Authority's (EPA's) technical guidance (***EPA 2016***). The majority of the Disturbance Footprint (75.2%; 4.48 ha) is Completely Degraded and/or cleared and contains no native vegetation, with the remainder (24.8%; 1.48 ha) containing native vegetation in Degraded condition (**Att. 1, Figure 4**).

It is noted that the section of the Disturbance Footprint to the north of Mather Road, totaling 2.1 ha (**Att. 1, Figure 3**), was not included within the 360 Environmental (2022) survey area. This area consists entirely of agricultural land cleared of native vegetation and thus has been classified as Completely Degraded. This area has already been included in the total given above.

3.1.2 Describe any existing or proposed uses for the project area.

The Project Area occurs across agricultural land, vacant crown land, a railway corridor and road reserves, with the Project Area primarily situated on either side of Mather Road. Most of the Project Area is undeveloped, however, portions of the Project Area's southern boundary intersect with railway infrastructure.

3.1.3 Describe any outstanding natural features and/or any other important or unique values that applies to the project area.

There are no outstanding natural features or any unique values that apply to the Project Area. The Project Area is not located in or near a conservation area (**Att. 1, Figure 7**).

3.1.4 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

The topography of the Project Area is relatively flat with heights ranging between 248 m and 244 mAHD with the land sloping in a south-easterly direction towards the Yilgarn River (***DPIRD 2023***).

3.2 Flora and fauna

3.2.1 Describe the flora and fauna within the affected area and attach any investigations of surveys if applicable.

A biological survey was undertaken by 360 Environmental in Spring 2022 within a Survey Area covering a total of 27.96 ha (herein '360 Environmental Survey Area'), which included the southern vegetated portion (3.85 ha) of the Project Area. An initial desktop assessment identified 74 conservation significant flora species, 34 conservation significant fauna species, four Priority Ecological Communities and one TEC with the potential to occur within the 360 Environmental Survey Area (**Att. 4, Section 4.2-4.3**). The post-survey flora and fauna likelihood of occurrence tables are presented in the 360 Environmental Biological Report (**Att. 4, Appendix C** and **Appendix F**, respectively).

In October 2023, Bamford Consulting Ecologists (Bamford) undertook an updated targeted Black Cockatoo survey and a Trapdoor Spider assessment within a 14.61 ha survey area ('Bamford Survey Area'; Bamford, 2024 [**Att. 5**]).

The results of the two surveys are summarised below. Data is presented for the entire 360 Environmental Survey Area or Bamford Survey Area, where it is unable to be differentiated from the smaller Disturbance Footprint (6.01 ha).

Flora

A total of 34 taxa, from 19 genera across 12 families were recorded within the 360 Environmental Survey Area, with the most dominant genus being *Eucalyptus* (**Att. 4, Section 4.2.4, pg. 16**). A full list of all the flora species recorded within the 360 Environmental Survey Area are presented in **(Att. 4, Appendix D**).

No EPBC Act or BC Act listed Threatened flora species nor any locally endemic Priority species, as listed by the Department of Biodiversity, Conservation and Attractions (DBCA), were recorded within the Disturbance Footprint.

A total of nine introduced species were recorded within the 360 Environmental Survey Area, representing approximately 24% of the total taxa recorded (**Att. 4, Section 4.2.6, pg. 16**). One species (**Echium plantagineum*) is listed as a Declared Pest under the WA *Biosecurity and Agricultural Management Act 2007* (***DPIRD 2021***) and was recorded in several locations within the 360 Environmental Survey Area (**Att. 4, Section 4.2.6, pg. 16**), including one record within the Disturbance Footprint.

Fauna

A total of 21 fauna species, from 14 families, were recorded within the 360 Environmental Survey Area. All of the species recorded were avian, with no mammals, reptiles or amphibians being recorded (**Att. 4, Section 4.3.4, pg. 24**). A full list of the fauna species recorded within the 360 Environmental Survey Area are presented in **(Att. 4, Appendix H**).

No EPBC Act, BC Act or DBCA listed fauna species were recorded within or directly surrounding the Disturbance Footprint (**Att. 4, Section 4.3.5, pg. 24**). The post-survey likelihood assessment identified one conservation significant species, Carnaby's Black Cockatoo (*Zanda latirostris*; Endangered under the EPBC/BC Acts), as having a high likelihood of occurring within the Disturbance Footprint (**Att. 4, Section 4.3.5, pg. 24**). One other species was assessed to have the potential to occur within the Disturbance Footprint, the Peregrine Falcon (*Falco peregrinus*; Specially Protected Fauna under the BC Act), which was identified as having a moderate likelihood of occurrence (**Att. 4, Section 4.3.5, pg. 24**).

A desktop assessment identified the potential for the Shield-backed Trapdoor Spider (*Idiosoma nigrum*; Vulnerable under the EPBC Act and Endangered under the BC Act) to occur within the Disturbance Footprint (**Att. 5, Section 3.4, pg. 30**). However, it was assessed as unlikely to occur within the Disturbance Footprint due to the scarcity of suitable habitat (only three small shrubs) and the absence of any recorded evidence during the survey.

One native broad fauna habitat occurs within the Disturbance Footprint (**Att. 4, Section 4.3.3, pg. 24)**: Mixed endemic and non-endemic Eucalypt woodland (1.5 ha; 24.9%). The habitat is described as open woodland of *Eucalyptus loxophleba*, *E. salmonophloia* and *E. camaldulensis* over sparse tussock

grassland. In addition, 1.22 ha (20.4%) of the Disturbance Footprint is classified as the non-native Weedy grassland habitat, described as open woodland (introduced Eucalypts) over cultivated and landscaped shrubland and heathland over low sparse rushland and/or sedgeland.

The remaining 3.27 ha (54.7%) within the Disturbance Footprint was devoid of vegetation and is thus mapped as 'Cleared' (**Att. 4, Section 4.3.3, pg. 24**). Note that the section of the Disturbance Footprint to the north of Mather Road, totalling 2.1 ha, was not included within the 360 Environmental Survey Area. This is because the area consists entirely of cleared agricultural land; and thus has been classified as 'Cleared'. This section is included in the total Cleared area of 3.27 ha.

Whilst there was no evidence (direct or indirect) of Carnaby's Black Cockatoo foraging within the Disturbance Footprint (**Att. 4, Section 4.4.1, pg. 27; Att. 5, Section 3.3.1, pg. 21**), the high likelihood of the species occurring within the Disturbance Footprint made it necessary for a foraging habitat assessment to be conducted. The assessment found that a total of 3.39 ha of the vegetation within the Disturbance Footprint was identified as suitable foraging habitat for the species (**Att. 1, Figure 6**). Of this, 1.74 ha (51.3%) was of moderate value (4/10), 0.03 ha (0.9%) was of low to moderate value (3/10) and 1.62 ha (47.8%) was of negligible to low value (1/10) (**Att. 5, Section 3.3.2, pg. 23**). The remaining 2.59 ha of the Disturbance Footprint had no foraging value, including the 2.12 ha northern section of the Disturbance Footprint, which was outside the Bamford Survey Area. This northern section consists entirely of cleared agricultural land (i.e. no foraging value).

The Bamford Survey Area also contains a total of 31 trees of a suitable species (***DAWE 2022***) which have a trunk diameter at breast height (DBH) of >500 mm (300 mm for *Eucalyptus salmonophloia*) giving them the potential to support Carnaby's Black Cockatoo breeding (**Att. 5, Section 3.3.3, pg. 25)**. Of these trees, eight occur within the Disturbance Footprint (seven *E. salmonophloia* and 1 introduced *E.* sp.) (**Att. 1, Figure 6**). Six of the potential breeding trees contained suitable breeding hollows for Carnaby's Black Cockatoo. The closest known breeding site for Carnaby's Black Cockatoo is approximately 120 km from the Project Area (**Att. 5, Section 3.3.3, pg. 25)**. No evidence of current or historic Carnaby's Black Cockatoo breeding was observed in relation to these hollows (**Att. 5, Section 3.3.3, pg. 25)**.

Nearby water sources are an important habitat feature for a Carnaby's Black Cockatoo roost (***DAWE 2022***). There are dams located nearby the Project Area (e.g. one is within approximately 200 m, others within approximately 2 km) (**Att. 1, Figure 3**). The large *Eucalyptus* trees within the Disturbance Footprint therefore have the potential to offer suitable Black Cockatoo roosting habitat (**Att. 5, Section 3.3.4, pg. 28)**.

3.2.2 Describe the vegetation (including the status of native vegetation and soil) within the project area.

Interim Biogeographical Regionalisation for Australia (IBRA)

The Project Area is situated within the Avon Wheatbelt IBRA bioregion and the Merredin subregion. The bioregion is characterised by residual lateritic uplands and derived sandplains which support proteaceous scrub-heaths rich in endemics, and Quaternary alluvials and eluvials which support mixed Eucalypt, *Allocasuarina huegeliana* and Jam-York Gum woodlands (***CALM 2002***). Salt Lake chains occur as remnants of ancient drainage systems that only function during years with above-average rainfall (***CALM 2002***).

Soils

Soil landscapes and land system mapping of Western Australia describes the broad soil and landscape characteristics from regional to local scales, ranging from 1:20,000 to 1;250,000 (***DPIRD 2022)***. At a broad scale the Project Area occurs within the Ancient Drainage zone of the Avon Province (Soil-Landscape Zone 258 [***Schoknecht et al. 2004]***). Within this zone the Project Area occurs within the Kellerberrin System and the Merredin Subsystem. This subsystem is defined as being '*Broad, flat valleys of the eastern wheatbelt containing heavy, red and grey soils*' (***DPIRD 2022***).

Vegetation

The Project Area occurs within the Mt Caroline (1049) vegetation association as mapped by Beard (***1976***) and refined by Shepherd et al. (***2002***). This vegetation association is described as '*Medium woodland; Wandoo, York Gum, Salmon Gum, Morrel and Gimle*t'. Approximately 6.8% of this vegetation association remains within the Avon Wheatbelt IBRA bioregion as of 2019 (***Government of Western Australia 2019***).

A total of three native vegetation types were identified as occurring within the Disturbance Footprint (**Att. 4 Section 4.2.8, pg. 19**). Vegetation type ElEs is described as *Eucalyptus loxophleba* subsp. *loxophleba* low isolated trees over *Acacia leptopetala, A. hemiteles*, and *Rhagodia drummondii* low isolated shrubs over **Avena* sp., **Lolium rigidum*, and *Rytidosperma caespitosum* low sparse grassland over **Echium plantagineum* low isolated herbs and covers 1.46 ha (24.4%) of the Disturbance Footprint. The other two native vegetation types are El and Es, described as *Eucalyptus loxophleba* subsp. *loxophleba* and Isolated *Eucalyptus salmonophloia*, respectively. These vegetation types cover <0.01 ha (0.1%) and 0.02 ha (0.3%) of the Disturbance Footprint, respectively.

In addition to the native vegetation types, the Disturbance Footprint contains two non-native vegetation types. The Mixed Weeds vegetation type is described as *Lolium rigidum* and *Avena* sp. herbs (**Att. 4 Section 4.2.8, pg. 19**) and covers 1.22 ha (20.4 %), while the NeE vegetation type is described as Non-endemic Eucalypts (planted) and covers 0.01 ha (0.1%) within the Disturbance Footprint.

The mapped vegetation types cover a total of 2.71 ha within the Disturbance Footprint, with the remaining 3.27 ha devoid of vegetation (native or introduced) and thus mapped as 'Cleared' (**Att. 1, Figure 5**). The 2.12 ha section of the Disturbance Footprint to the north of Mather Road was not included in the 360 Environmental Survey Area. This area consists entirely of cleared agricultural land and thus has been classified as 'Cleared' and is in Completely Degraded condition. This section is included in the total Cleared area of 3.27 ha.

Eucalypt Woodlands of the Western Australian Wheatbelt TEC

The PMST search (***DCCEEW 2023)*** identified that the Wheatbelt Woodlands TEC (Critically Endangered under the EPBC Act) has the potential to occur within the Disturbance Footprint (**Att. 4**, **Section 2.2, pg. 15**).

Based on the updated assessment conducted by 360 Environmental, the 'ElEs' vegetation type within the Disturbance Footprint is considered to meet the key diagnostic and condition threshold criteria for Category D Wheatbelt Woodlands TEC (**Att. 6, pg. 14**). As such, 1.46 ha of the TEC occurs within the Disturbance Footprint (**Att. 1, Figure 5**).

3.3 Heritage

3.3.1 Describe any Commonwealth Heritage Places Overseas or other places recognised as having heritage values that apply to the project area.

There are no National Heritage Places within the Project Area. The closest National Heritage Place is Goldfields Water Supply Scheme, located approximately 100 m to the south of the Project Area (**DCCEEW 2023**).

3.3.2 Describe any Indigenous heritage values that apply to the project area.

According to the Department of Planning, Land and Heritage's Aboriginal Cultural Heritage Inquiry System there are no Registered Aboriginal Sites or Other Heritage Places located within the Project Area (***DPLH 2023***). The closest site is Jureen Rock (Place 15140) approximately 5 km to the north-east of the Project Area. The likely absence of any cultural heritage sites or scattered artefacts was confirmed by advice provided by Ballardong Representatives during an on-site heritage survey (**Att. 7, Section 4, pg. 33**).

3.4 Hydrology

3.4.1 Describe the hydrology characteristics that apply to the project area and attach any hydrological investigations or surveys if applicable. *

The Project Area is not within a Public Drinking Water Source Area proclaimed under the *Metropolitan Water Supply, Sewerage, and Drainage Act 1909* (WA) or the *Country Areas Water Supply Act 1947* (WA), nor is it within a Groundwater Proclamation Area stipulated under the *Rights in Water and Irrigation Act 1914* (WA). However, it does occur within the Avon River System Surface Water Proclamation Area.

The Project Area occurs within the Avon River Catchment and does not intersect with any watercourse, wetland or riparian zone (**Att. 1, Figure 3 and Figure 7**). The closest notable hydrological feature is the Yilgarn River, approximately 1.5 km to the south. This tributary of the Avon River occurs in the northern zone of ancient drainage, a landscape characterised by very low relief with broad, flat valley floors with drainage through chains of salt lakes (***DoW 2008***), typified by this watercourse. Flow along the waterways in this zone is infrequent, typically occurring only in very wet winters or following heavy summer rains associated with cyclones or rain-bearing depressions (***WRC & ARMA 1999***). A tributary of the Yilgarn River, Morranoppin Creek, lies approximately 1.2 km to the east of the Project Area, where it is bisected by the Great Eastern Highway.

The Project Area currently contains an open drain that runs between the existing railway corridor and Mather Road. This drain terminates at a culvert under an existing level rail crossing at the eastern end of the Project Area.

Groundwater was not observed to be present within the depths of boreholes (<2.6 m below ground level [mbgl]) during a geotechnical investigation conducted in January 2018 for the existing CBH Kellerberrin Grain Receival Site (north-west of the Project Area) (**Att. 8, Section 5.4, pg. 13**). Water at approximately 1 mbgl was observed in two small drainage ponds located in the centre of the existing Grain Receival Site.

Groundwater monitoring bores located around the Kellerberrin township show that over the last 20 years, there has been an overall downward trend in the height of the local groundwater (***BoM 2024***). The average height of the four closest bores to the Development Envelope (ARTP00KE01D, ARTP00KE15D, ARTP00KE20D and ARTPOOKE28D) in 2000 was 4.1 mbgl, whilst the average groundwater height across these four bores in 2020 was 5.7 mbgl (***BoM 2024***). This is likely reflective of the overall decline in annual rainfall experienced by this area over the same period (***BoM 2025***).

4. Impacts and mitigation

4.1 Impact details

Potential Matters of National Environmental Significance (MNES) relevant to your proposed action area.

EPBC Act section	Controlling provision	Impacted	Reviewed
S12	World Heritage	No	Yes
S15B	National Heritage	No	Yes
S16	Ramsar Wetland	No	Yes
S18	Threatened Species and Ecological Communities	Yes	Yes
S20	Migratory Species	No	Yes
S21	Nuclear	No	Yes
S23	Commonwealth Marine Area	No	Yes
S24B	Great Barrier Reef	No	Yes
S24D	Water resource in relation to large coal mining development or coal seam gas	No	Yes
S26	Commonwealth Land	No	Yes
S27B	Commonwealth Heritage Places Overseas	No	Yes
S28	Commonwealth or Commonwealth Agency	No	Yes

4.1.1 World Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.1.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.1.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Project Area is situated more than 230 km east from the closest World Heritage Site (Fremantle Prison).

4.1.2 National Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	National heritage
No	No	Goldfields Water Supply Scheme, Western Australia

4.1.2.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.2.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

There are no National Heritage Places within the Project Area. The closest National Heritage Place is Goldfields Water Supply Scheme, located approximately 100 m to the south of the Project Area will not be impacted directly or indirectly due to distance from the project area (**DCCEEW 2023**).

4.1.3 Ramsar Wetland

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.3.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.3.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The nearest Ramsar wetland is Forrestdale & Thomsons Lakes, located in the City of Cockburn. This Ramsar site is approximately 180 km from the Project Area (**DCCEEW 2023**).

4.1.4 Threatened Species and Ecological Communities

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Threatened species

Direct impact	Indirect impact	Species	Common name
No	No	Acacia ataxiphylla subsp. magna	Large-fruited Tammin Wattle
No	No	Aphelocephala leucopsis	Southern Whiteface
No	No	Calidris acuminata	Sharp-tailed Sandpiper
No	No	Calidris ferruginea	Curlew Sandpiper
No	No	Conospermum galeatum	
No	No	Dasymalla axillaris	Native Foxglove
No	No	Dasyurus geoffroii	Chuditch, Western Quoll
No	No	Egernia stokesii badia	Western Spiny-tailed Skink, Baudin Island Spiny-tailed Skink
No	No	Eremophila resinosa	Resinous Eremophila
No	No	Eremophila viscida	Varnish Bush
No	No	Goodenia arthrotricha	
No	No	Grevillea dryandroides subsp. hirsuta	Hairy Phalanx Grevillea
No	No	Idiosoma nigrum	Shield-backed Trapdoor Spider, Black Rugose Trapdoor Spider
No	No	Leipoa ocellata	Malleefowl
No	No	Phascogale calura	Red-tailed Phascogale, Red-tailed Wambenger, Kenngoor
No	No	Rostratula australis	Australian Painted Snipe
No	No	Roycea pycnophylloides	Saltmat
Yes	No	Zanda latirostris	Carnaby's Black Cockatoo, Short-billed Black-cockatoo

Ecological communities

Direct impact	Indirect impact	Ecological community
Yes	No	Eucalypt Woodlands of the Western Australian Wheatbelt

4.1.4.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.4.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

Threatened Flora Species

The Disturbance Footprint does not contain any Threatened Flora species, nor are any likely to be impacted by the Proposed Action.

Threatened Ecological Communities

The 'ElEs' vegetation type covers a total of 1.46 ha within the Disturbance Footprint and is considered to meet the key diagnostic and condition threshold criteria for Category D Wheatbelt Woodlands TEC (**Att. 6, pg. 14**). The implementation of the Proposed Action is expected to result in all of the 1.46 ha of TEC within the Disturbance Footprint being cleared.

Threatened Fauna Species

Despite no direct or indirect evidence of Carnaby's Black Cockatoo being found within the Disturbance Footprint, it occurs within the species natural breeding range and contains suitable breeding and foraging habitat (**Att. 4, Section 5.2.3.1, pg. 31; Att. 5, Section 3.3.1, pg. 21**). As such, the species was determined to have a high likelihood of occurring within the Disturbance Footprint (**Att. 4, Section 4.3.5, pg. 24**).

The Disturbance Footprint contains 3.39 ha of vegetation considered to be suitable foraging habitat for Carnaby's Black Cockatoo (**Att. 1, Figure 6**). A foraging habitat assessment concluded that 1.74 ha was of moderate value (4/10), 0.03 ha was of low to moderate value (3/10) and 1.62 ha was of negligible to low foraging value (1/10) (**Att. 5, Section 3.3.2, pg. 23**).

A total of eight potential breeding trees were recorded within the Disturbance Footprint, including, seven *E. salmonophloia* and one introduced *Eucalyptus* sp. (**Att. 1, Figure 6**). The implementation of the Proposed Action will result in the removal of all potential breeding trees within the Disturbance Footprint. Six of the potential breeding trees contained potentially suitable breeding hollows for Carnaby's Black Cockatoo. No evidence of current or historic Carnaby's Black Cockatoo breeding was observed in relation to these hollows (**Att. 5, Section 3.3.3, pg. 25)**.

The eight large Eucalyptus trees within the Disturbance Footprint have the potential to offer suitable Black Cockatoo roosting habitat (**Att. 5, Section 3.3.4, pg. 28)**.

No direct impacts to Carnaby's Black Cockatoo individuals are anticipated as a result of the Proposed Action. The proposed clearing and construction will occur over a short timeframe; this combined with the highly mobile nature of the Carnaby's Black Cockatoo means that vehicle strike or other direct interaction is not expected.

An assessment of the likelihood of occurrence for other EPBC listed species identified in the PMST search is presented in **Att. 4.** All other EPBC listed fauna species were assessed as 'Unlikely' to occur within the Disturbance Footprint due to lack of suitable habitat (**Att. 4, Section 5.2.3, pg.31**).

4.1.4.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact? *

Yes

4.1.4.5 Describe why you consider this to be a Significant Impact. *

Threatened Fauna Species

The Proposed Action is likely to cause a significant impact to Carnaby's Black Cockatoo as it will result in the loss of eight potential breeding trees (including six trees with hollows potentially suitable for breeding) and 1.77 ha of suitable foraging habitat of moderate and low to moderate value. The Commonwealth Black Cockatoo referral guidelines (***DAWE 2022***) consider the loss or impact to any known, suitable or potential breeding tree and the habitat surrounding the tree to represent a significant impact to the species.

Threatened Ecological Communities

The Proposed Action is likely to significantly impact Wheatbelt Woodland TEC, as it will result in the loss of 1.46 ha of the Category D Wheatbelt Woodland TEC. The Approved Conservation Advice (***DoE 2015***) indicates that any impacts to the community would be considered to be significant.

4.1.4.7 Do you think your proposed action is a controlled action? *

Yes

4.1.4.8 Please elaborate why you think your proposed action is a controlled action. *

The Proposed Action is considered to have a significant impact on the Wheatbelt Woodlands TEC and Carnaby's Black Cockatoo potential breeding and moderate or lower value foraging habitat.

4.1.4.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

Project Area alternatives, avoidance, and mitigation

Multiple concepts for the rail alignment were explored in the early stages of project development. Given the constraints in the area surrounding the existing Kellerberrin railway, alternative potential sites for the Proposed Action were extremely limited. These constraints included (but were not limited to):

- the location of existing Grain Receival Site and rail infrastructure
- ensuring the new rail alignment was fit for purpose and could allow the targeted 88 train wagons to fit within a single shunt
- technical rail considerations due to design criteria of rail infrastructure manager Arc Infrastructure
- avoiding impacts to existing level crossings (Arc Infrastructure requirement)
- inability to construct new level crossing by curving the rail siding to the north over Mather Road (Arc Infrastructure requirement)
- difficulties associated with existing land ownership/acquisition.

In consideration of the above constraints, two options remained, extending the siding east or west. The 27.96 ha 360 Environmental Survey Area (**Att. 4**) covered the areas considered for construction of the Proposed Action. The option to the west brought the noise from the rail operation closer to Kellerberrin town and caused the sensors for the level crossing boom gates to be activated by shunting. This was difficult to correct or avoid through design. The clearing of native vegetation was also required as part of the western option. After consideration of operational and rail network constraints and combined with potential environmental and social impacts, a single viable option (the Proposed Action) remained.

The proposed Disturbance Footprint avoids 23 potential Carnaby's Black Cockatoo breeding trees, and 10.72 ha of foraging habitat identified within the Bamford Survey Area (**Att. 5, Section 3.3.3, pg. 25**). The Disturbance Footprint within the Project Area was intentionally reduced to avoid impacts to six potential Carnaby's Black Cockatoo breeding trees; two Eucalyptus salmonophloia, one E. loxophleba (containing a potentially suitable hollow) and three planted E. sp., which are located within the Avoidance Area. This was achieved by:

- optimisation of the rail alignment and associated infrastructure south of Mather Road
- minimising the extent of earthworks around potential habitat trees, as far as practicable
- adjusting the drainage design, including minimising drainage infrastructure constructed to the south of Mather Road and instead constructing the majority to the north of Mather Road, within areas of cleared agricultural land (**Att. 1, Figure 2 a-d**).

Trees have only been proposed to be cleared where there is no ability for retention given their location as well as construction and operational constraints.

The Disturbance Footprint is inclusive of all areas that may be impacted by the Proposed Action works. However, the final extent of vegetation clearing may be reduced following finalisation of the design and construction methodology of the Proposed Action. The clearing of MNES values will be minimised as much as practicable. The final length of the railway track will be the minimum required for operation and achievement of project technical specifications.

Construction Environmental Management Plan

A draft CEMP will be prepared and finalised prior to the commencement of vegetation clearing/construction to describe how the impacts of activities related to the construction phase of the Proposed Action will be managed to reduce potential direct and indirect impacts on the environment.

This document outlines management measures applicable to MNES during construction (e.g. demarcation of clearing areas and timing of clearing), including a pre-clearance Carnaby's Black Cockatoo survey. To avoid potential impacts to breeding Carnaby's Black Cockatoos, if the Proposed Action is undertaken during the breeding season, within seven days prior to any clearing all potentially suitable breeding trees that may be cleared will be investigated for the presence of nesting Carnaby's Black Cockatoos. If cockatoo breeding

is confirmed or suspected, the breeding tree will be clearly marked with fencing and signage located within 2 m of the base of the breeding tree. The breeding tree, or any vegetation within 10 m of the breeding tree, will not be cleared until the hollow is no longer in use by Carnaby's Black Cockatoos.

The CEMP will also outline other good practice construction environmental management requirements, for example the appropriate storage and handling of chemicals and hydrocarbons, groundwater and surface water management, dust and weed management and other hygiene measures during the construction period, as well as any disturbance rehabilitation requirements, as relevant.

4.1.4.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

CBH understands that the Proposed Action is likely to have a significant residual impact both to Wheatbelt Woodlands TEC and Carnaby's Black Cockatoo habitat within the Project Area, and this impact will require offsets.

Additional details on the Proposed Action's proposed offsets will be provided to DCCEEW during the assessment period, in the form of an Offset Proposal and/or Offset Management Plan outlining the proposed environmental offsets. CBH's preferred strategy is to provide funds to DBCA for the department to acquire suitable land that is currently in unprotected tenure/zoning (e.g. freehold land zoned for general agriculture) or acquire the land directly. This land will either be vested with the Conservation and Parks Commission of Western Australia, or have a conservation covenant placed on the land, securing it in perpetuity for conservation purposes. Rehabilitation/revegetation would likely be proposed to increase the MNES values present onsite (for example, increase their extent and/or improve their condition).

CBH has previously engaged with DBCA regarding areas of remnant vegetation that DBCA would be interested in acquiring that could be suitable as land acquisition offsets for other similar CBH projects. CBH has also conducted detailed desktop studies followed by site assessments of potential land acquisition targets for offsets for projects at Moora and Cranbrook and is evaluating conducting similar processes for this Proposed Action. In the short to medium term, CBH would manage the offset site(s) and coordinate the rehabilitation of the MNES values present, including the establishment and maintenance of Carnaby's Black Cockatoo nest boxes. Once the Offset Management Plan completion criteria are met, the offset site(s) will eventually be transferred to DBCA for management in perpetuity.

4.1.5 Migratory Species

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Species	Common name
No	No	Actitis hypoleucos	Common Sandpiper
No	No	Apus pacificus	Fork-tailed Swift
No	No	Calidris acuminata	Sharp-tailed Sandpiper
No	No	Calidris ferruginea	Curlew Sandpiper
No	No	Calidris melanotos	Pectoral Sandpiper
No	No	Motacilla cinerea	Grey Wagtail

4.1.5.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.5.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

A biological survey has been undertaken by 360 Environmental within the Project Area. The assessment determined that no migratory species of conservation significance are likely to occur within the Project Area (**Att. 4, Section 4.3, pp.23**).

4.1.6 Nuclear

4.1.6.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.6.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action is not a Nuclear Action.

4.1.7 Commonwealth Marine Area

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.7.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.7.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

There are no Commonwealth Marine Areas that will be impacted by the Proposed Action, the closest is over 250 km to the west of the Project Area (**DCCEEW 2023**).

4.1.8 Great Barrier Reef

4.1.8.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.8.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Great Barrier Reef is located approximately 3,500 km to the north-east of the Project Area.

4.1.9 Water resource in relation to large coal mining development or coal seam gas

4.1.9.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.9.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action is not a large coal mining development, nor coal seam gas.

4.1.10 Commonwealth Land

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.10.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.10.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

No Commonwealth land is within the vicinity of the Project Area (***DCCEEW 2023***).

4.1.11 Commonwealth Heritage Places Overseas

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.11.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.11.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Project Area does not intersect with any ‘Commonwealth Heritage Places Overseas’.

4.1.12 Commonwealth or Commonwealth Agency

4.1.12.1 Is the proposed action to be taken by the Commonwealth or a Commonwealth Agency? *

No

4.2 Impact summary

Conclusion on the likelihood of significant impacts

You have indicated that the proposed action will likely have a significant impact on the following Matters of National Environmental Significance:

- Threatened Species and Ecological Communities (S18)

Conclusion on the likelihood of unlikely significant impacts

You have indicated that the proposed action will unlikely have a significant impact on the following Matters of National Environmental Significance:

- World Heritage (S12)
- National Heritage (S15B)
- Ramsar Wetland (S16)
- Migratory Species (S20)
- Nuclear (S21)
- Commonwealth Marine Area (S23)
- Great Barrier Reef (S24B)
- Water resource in relation to large coal mining development or coal seam gas (S24D)
- Commonwealth Land (S26)
- Commonwealth Heritage Places Overseas (S27B)
- Commonwealth or Commonwealth Agency (S28)

4.3 Alternatives

4.3.1 Do you have any possible alternatives for your proposed action to be considered as part of your referral? *

No

4.3.8 Describe why alternatives for your proposed action were not possible. *

Multiple concepts for the rail alignment were explored during the early stages of project development with a single viable option remaining after considering operational and rail network constraints, combined with potential environmental and social impacts (see section 4.1.4.10).

The rail alignment options for the Proposed Action were limited due to site constraints and the requirement for the Proposed Action to avoid any adverse impacts to the operation of the existing high usage rail mainline. The options for extending the siding to the west were considered but were ultimately concluded to not be viable due to potential impacts on the existing level crossing activation sensors. This option would have had a similar impact on existing native vegetation, with two vegetated areas required to be cleared. Ultimately, the option chosen for the Proposed Action was deemed the only one feasible. This option has been optimised as far as is practicable to reduce impacts to the existing environment, including the preservation of six Carnaby's Black Cockatoo potential breeding trees located in the Avoidance Area.

5. Lodgement

5.1 Attachments

1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att. 1 - Figures.pdf The figures pertaining to the action, referenced across the referral form.		Yes	High

1.2.6 Commonwealth or state legislation, planning frameworks or policy documents that are relevant to the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Approved Conservation Advice (including listing advice) for the WWTEC http://www.environment.gov.au/biodiversity/threa..			High
#2.	Link	Referral guideline for 3 WA threatened black cockatoo species https://www.dcceew.gov.au/sites/default/files/do..			High

1.3.2.17 (Person proposing to take the action) Proposer's history of responsible environmental management

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Environmental Protection (Unauthorised Discharges) Regulations 2004: fact sheet https://www.wa.gov.au/system/files/2021-12/2018_..			High

1.3.2.18 (Person proposing to take the action) If the person proposing to take the action is a corporation, provide details of the corporation’s environmental policy and planning framework

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att. 2 - CBH HSE Policy.pdf CBH Health, Safety and Environment Policy			High
#2.	Document	Att. 3 - CBH Sustainability Overview.pdf This document identifies that proponent regards protection of the physical environment and conservation of the natural resources as an essential element to the organisation’s operations and crucial to the long-term sustainability of agriculture in Australia. The Sustainability Action Plan identifies how this will be achieved.			High

#3.	Link	Our Sustainability Plan https://www.cbh.com.au/our-co-operative/sustaina..		High

3.1.1 Current condition of the project area's environment

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att. 1 - Figures.pdf The figures pertaining to the action, referenced across the referral form.		Yes	High
#2.	Document	Att. 4 - Kellerberrin_Flora Fauna and BC Survey Report FINAL.pdf The purpose of the assessment was to identify key biological values within the Survey Area to support the Environmental Impact Assessment (EIA) process and approvals applications to develop the Project. This report presents results of the survey undertaken.		Yes	High
#3.	Document	Att. 4 -Redacted- Kellerberrin_Flora Fauna and BC Survey Report FINAL.pdf The purpose of the assessment was to identify key biological values within the Survey Area to support the Environmental Impact Assessment (EIA) process and approvals applications to develop the Project. This report presents results of the survey undertaken.		Yes	High
#4.	Link	Technical Guidance - Flora and Vegetation Surveys for Environmental Impact Assessment https://www.epa.wa.gov.au/sites/default/files/Po..			High

3.1.3 Natural features, important or unique values that applies to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att. 1 - Figures.pdf The figures pertaining to the action, referenced across the referral form.		Yes	High

3.1.4 Gradient relevant to the project area

	Type	Name	Date	Sensitivity	Confidence

#1.	Link	2-meter contours (DPIRD-072) https://catalogue.data.wa.gov.au/dataset/dpird-2..	High

3.2.1 Flora and fauna within the affected area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att. 1 - Figures.pdf The figures pertaining to the action, referenced across the referral form.		Yes	High
#2.	Document	Att. 4 - Kellerberrin_Flora Fauna and BC Survey Report FINAL.pdf The purpose of the assessment was to identify key biological values within the Survey Area to support the Environmental Impact Assessment (EIA) process and approvals applications to develop the Project. This report presents results of the survey undertaken.		Yes	High
#3.	Document	Att. 4 -Redacted- Kellerberrin_Flora Fauna and BC Survey Report FINAL.pdf The purpose of the assessment was to identify key biological values within the Survey Area to support the Environmental Impact Assessment (EIA) process and approvals applications to develop the Project. This report presents results of the survey undertaken.		Yes	High
#4.	Document	Att. 5 - CBH Kellerberrin BCs and spiders report.docx This report presents the results of the targeted black-cockatoo assessment and targeted trapdoor spider assessment for the Kellerberrin project area. The project area was visited on 6th October 2023.			High
#5.	Link	Declared plants https://www.agric.wa.gov.au/organisms.			High
#6.	Link	Referral guideline for 3 WA threatened black cockatoo species https://www.dcceew.gov.au/sites/default/files/do..			High

3.2.2 Vegetation within the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att. 1 - Figures.pdf The figures pertaining to the action, referenced across the referral form.		Yes	High
#2.	Document	Att. 4 - Kellerberrin_Flora Fauna and BC Survey Report FINAL.pdf The purpose of the assessment was to identify key biological values within the Survey Area to support the Environmental Impact Assessment (EIA) process and approvals applications to develop the Project. This report presents results of the survey undertaken.		Yes	High
#3.	Document	Att. 4 -Redacted- Kellerberrin_Flora Fauna and BC Survey Report FINAL.pdf The purpose of the assessment was to identify key biological values within the Survey Area to support the Environmental Impact Assessment (EIA) process and approvals applications to develop the Project. This report presents results of the survey undertaken.		Yes	High
#4.	Document	Att. 6 - Kellerberrin Flora, Fauna and BC Report Addendum.pdf This addendum presents a re-assessment of those patches against the diagnostic criteria as an amendment to the assessment originally presented in the Kellerberrin Receival Facility Expansion Spring Biological Survey Report (360 Environmental, 2022).			High
#5.	Link	2018 Statewide Vegetation Statistics incorporating the CAR Reserve Analysis (Full Report). https://catalogue.data.wa.gov.au/dataset/dbca-st..			High
#6.	Link	Bioregional Summary of the 2002 Biodiversity Audit for Western Australia https://www.researchgate.net/publication/2737083..			High

#7.	Link	EPBC Act Protected Matters Search Tool. https://pmst.environment.gov.au/#/map?lng=131.52..		High
#8.	Link	Native Vegetation in Western Australia, Extent, Type and Status https://library.dpird.wa.gov.au/rmtr/235/		High
#9.	Link	Soil Landscape Mapping - Systems (DPIRD-064) - GIS Dataset. https://catalogue.data.wa.gov.au/dataset/soillan..		High
#10.	Link	Soil-landscape mapping in south-Western Australia: an overview of methodology and outputs. https://library.dpird.wa.gov.au/rmtr/263/	01/11/2004	High
#11.	Link	Vegetation survey of Western Australia. Western Australia 1: 1 000 000 vegetation series. https://link.springer.com/article/10.1007/BF0238..		High

3.3.1 Commonwealth heritage places overseas or other places that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	EPBC Act Protected Matters Search Tool. https://pmst.environment.gov.au/#/map?lng=131.52..			High

3.3.2 Indigenous heritage values that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att. 7 - Redacted -Archae-aus CBH Kellerberrin Archaeological and Ethnographic.pdf This document details the results of an archaeological and ethnographic survey of CBH Group's proposed Rapid Rail Loading facility in Kellerberrin, Western Australia. The fieldwork was undertaken with Ballardong Traditional Owners on		Yes	High

		the 1 November 2022. Ballardong representatives participated in all aspects of the ethnographic and archaeological survey and site recording.	
#2.	Link	Aboriginal Cultural Heritage Enquiry System https://espatial.dplh.wa.gov.au/ACHIS/index.html..	High

3.4.1 Hydrology characteristics that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att. 1 - Figures.pdf The figures pertaining to the action, referenced across the referral form.		Yes	High
#2.	Document	Att. 8 - 2018_Kellerberrin_Goldeer Geotechnical report.pdf This report presents the results of a geotechnical investigation undertaken by Golder Associates Pty Ltd (Golder) for the proposed upgrade works at the Kellerberrin and Wickepin grain receival facilities.			High
#3.	Link	Australian Groundwater Explorer http://www.bom.gov.au/water/groundwater/explorer/			High
#4.	Link	Avon River Management Programme https://library.dbca.wa.gov.au/static/Journals/0..			High
#5.	Link	Monthly climate data statistics http://www.bom.gov.au/climate/data/			High
#6.	Link	Priority tributaries of the Avon River basin https://old.wheatbeltnrm.org.au/our-information/..			High

4.1.2.3 (National Heritage) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	EPBC Act Protected Matters Search Tool.			High

https://pmst.environment.gov.au/#/map?lng=131.52..

4.1.3.3 (Ramsar Wetland) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	EPBC Act Protected Matters Search Tool. https://pmst.environment.gov.au/#/map?lng=131.52..			High

4.1.4.2 (Threatened Species and Ecological Communities) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att. 1 - Figures.pdf The figures pertaining to the action, referenced across the referral form.		Yes	High
#2.	Document	Att. 4 -Redacted- Kellerberrin_Flora Fauna and BC Survey Report FINAL.pdf The purpose of the assessment was to identify key biological values within the Survey Area to support the Environmental Impact Assessment (EIA) process and approvals applications to develop the Project. This report presents results of the survey undertaken.		Yes	High
#3.	Document	Att. 5 - CBH Kellerberrin BCs and spiders report.docx This report presents the results of the targeted black-cockatoo assessment and targeted trapdoor spider assessment for the Kellerberrin project area. The project area was visited on 6th October 2023.			High
#4.	Document	Att. 6 - Kellerberrin Flora, Fauna and BC Report Addendum.pdf This addendum presents a re-assessment of those patches against the diagnostic criteria as an amendment to the assessment originally presented in the Kellerberrin Receival Facility Expansion Spring Biological Survey Report (360 Environmental, 2022).			High

4.1.4.5 (Threatened Species and Ecological Communities) Why you consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Approved Conservation Advice (including listing advice) for the Eucalypt WWTEC http://www.environment.gov.au/biodiversity/threa..			High
#2.	Link	Referral guideline for 3 WA threatened black cockatoo species https://www.dcceew.gov.au/sites/default/files/do..			High

4.1.4.10 (Threatened Species and Ecological Communities) Avoidance or mitigation measures proposed for this action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att. 1 - Figures.pdf The figures pertaining to the action, referenced across the referral form.		Yes	High
#2.	Document	Att. 4 - Kellerberrin_Flora Fauna and BC Survey Report FINAL.pdf The purpose of the assessment was to identify key biological values within the Survey Area to support the Environmental Impact Assessment (EIA) process and approvals applications to develop the Project. This report presents results of the survey undertaken.		Yes	High
#3.	Document	Att. 4 -Redacted- Kellerberrin_Flora Fauna and BC Survey Report FINAL.pdf The purpose of the assessment was to identify key biological values within the Survey Area to support the Environmental Impact Assessment (EIA) process and approvals applications to develop the Project. This report presents results of the survey undertaken.		Yes	High
#4.	Document	Att. 5 - CBH Kellerberrin BCs and spiders report.docx This report presents the results of the targeted black-cockatoo assessment and targeted trapdoor spider assessment for the Kellerberrin project area. The project area was visited on 6th October 2023.			High

4.1.5.3 (Migratory Species) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att. 4 - Kellerberrin_Flora Fauna and BC Survey Report FINAL.pdf The purpose of the assessment was to identify key biological values within the Survey Area to support the Environmental Impact Assessment (EIA) process and approvals applications to develop the Project. This report presents results of the survey undertaken.		Yes	High
#2.	Document	Att. 4 -Redacted- Kellerberrin_Flora Fauna and BC Survey Report FINAL.pdf The purpose of the assessment was to identify key biological values within the Survey Area to support the Environmental Impact Assessment (EIA) process and approvals applications to develop the Project. This report presents results of the survey undertaken.		Yes	High

4.1.7.3 (Commonwealth Marine Area) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	EPBC Act Protected Matters Search Tool https://pmst.environment.gov.au/#/map?lng=131.52..			High

4.1.10.3 (Commonwealth Land) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	EPBC Act Protected Matters Search Tool https://pmst.environment.gov.au/#/map?lng=131.52..			High

5.2 Declarations

Completed Referring party's declaration

The Referring party is the person preparing the information in this referral.

ABN/ACN	29256604947
Organisation name	CO-OPERATIVE BULK HANDLING LIMITED
Organisation address	6000 WA
Representative's name	Andrew Black
Representative's job title	Manager, Environment and Sustainability
Phone	+61 474 868 780
Email	andrew.black@cbh.com.au
Address	Level 6, 240 St George's Terrace Perth WA 6000

☑ Check this box to indicate you have read the referral form. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

☑ By checking this box, I, **Andrew Black of CO-OPERATIVE BULK HANDLING LIMITED**, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

Completed Person proposing to take the action's declaration

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

Same as Referring party information.

☑ Check this box to indicate you have read the referral form. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

☑ I, **Andrew Black of CO-OPERATIVE BULK HANDLING LIMITED**, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity. *

☑ I, **Andrew Black of CO-OPERATIVE BULK HANDLING LIMITED**, the Person proposing the action, consent to the designation of **Andrew Black of CO-OPERATIVE BULK HANDLING LIMITED** as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

✔ Completed Proposed designated proponent's declaration

The Proposed designated proponent is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

☑ Check this box to indicate you have read the referral form. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *

☑ I, **Andrew Black of CO-OPERATIVE BULK HANDLING LIMITED**, the Proposed designated proponent, consent to the designation of myself as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. *

☑ I would like to receive notifications and track the referral progress through the EPBC portal. *