

Windellama Landfill Project

Application Number: **03391**

Commencement Date:
31/03/2026

Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Windellama Landfill Project

1.1.2 Project industry type *

Waste Management (non-sewerage)

1.1.3 Project industry sub-type

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1.1.4 Estimated start date *

01/07/2026

1.1.4 Estimated end date *

31/12/2028

1.2 Proposed Action details

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

Hi-Quality Waste Management Pty Ltd (HiQ) is a subsidiary of the Hi-Quality Group and is the owner and operator of the Windellama Landfill, an existing non-putrescible landfill facility located approximately seven kilometres (km) south of Windellama, NSW (Figure 1 of Attachment A of this Referral).

The Windellama Landfill site originally operated as a clay quarry in accordance with DA 145-9-1-47 (dated 16 December 1981). The Windellama Landfill currently operates under a development consent (DA 989/130) issued by Goulburn Mulwaree Council (Council) on 3 June 1999.

The proposed Action that is the subject of this Referral includes vegetation clearing within the 'Action Area' (as shown on Figure 2 of Attachment A) to enable the carrying out of the operations approved under DA 989/130. The Action, the subject of this Referral, explicitly does not include any other operational activities being undertaken by HiQ within the Site.

The overall site is approximately 175 hectares (ha) however, the Action Area disturbance footprint is only approximately 4.7 ha, noting the Action would also result in the avoidance of approximately 1.2 ha of vegetation currently approved to be cleared under DA 989/130.

HiQ has lodged a separate Referral for all activities associated with the proposed Windellama Expansion Project. The Action, the subject of this Referral, explicitly does not involve any activities associated with the proposed expansion of operations.

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

Yes

1.2.3 Is the proposed action the first stage of a staged development (or a larger project)?

No

1.2.4 Related referral(s)

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1.2.5 Provide information about the staged development (or relevant larger project).

HiQ has lodged a separate EPBC Act Referral to expand operations at the existing Windellama Landfill (i.e. the Windellama Landfill Expansion [EPBC 2026/10489]). While it is recognised that actions proposed under EPBC 2026/10489 are related, it is important to note that these two referrals constitute two separate Actions (i.e. they are not considered to be a component of a larger action, as contemplated under section 74A of the EPBC Act).

The Action which is subject to this referral relates solely to the clearing of vegetation required to enable the carrying out of the operations already approved under DA 989/130 as outlined in Section 1.2.1.

This Action does not involve any activities associated with the proposed expansion being considered under EPBC 2026/10489.

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

Under the EPBC Act, any action that is likely to have a significant impact on a matter of national environmental significance (MNES) is deemed to be a 'controlled action' and requires approval under the EPBC Act.

This referral has been prepared to assist the Commonwealth Minister for the Environment in determining whether or not the Action is a controlled action by providing a preliminary assessment of potential impacts on all MNES.

State Legislation

The NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and the NSW *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) set the framework for planning and environmental assessment in NSW. These activities are already approved to be cleared under the NSW EP&A Act.

All other relevant leases, licences and approvals required under other NSW legislation have been granted.

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. *

HiQ has consulted with the Commonwealth DCCEEW regarding the need for assessment and approval of the Action. Further to this, it should be noted that extensive consultation has occurred with the NSW Government, local Council and community members in relation to the proposed expansion of the site (subject to separate referral and assessment). As such, HiQ has a strong understanding of the level of community interest in the site.

This engagement has made it clear that the key concern for all parties relates to truck movements along local roads, including impacts on road condition and safety concerns. Beyond the local community, the level of public interest regarding the Windellama Landfill is considered to be very low. Interest in this Action in particular, is considered to be negligible noting that the area of vegetation proposed to be cleared is already approved under DA 989/130.

1.3.1 Identity: Referring party

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By completing and submitting this form, you consent to the collection of all personal information contained in this form. If you are providing the personal information of other individuals in this form, please ensure you have their consent before doing so.

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1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details

ABN/ACN 11664497198

Organisation name VESSI PTY LTD

Organisation address 4151 QLD

Referring party details

Name Joe Fittell

Job title Principal Environmental Manager

Phone 0466445072

Email joe@vessi.com.au

Address South Brisbane, QLD, 4101

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? *

No

1.3.2.2 Is Person proposing to take the action an organisation or business? *

Yes

Person proposing to take the action organisation details

ABN/ACN 25003105379
Organisation name HI-QUALITY WASTE MANAGEMENT PTY LTD
Organisation address PO Box 699 Hoxton Park NSW 2171

Person proposing to take the action details

Name Lance Ingrams
Job title Chief Strategy Officer
Phone (02) 9826 1666
Email lingrams@hiq.au
Address PO Box 699 Hoxton Park NSW 2171

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. *

Details of the compliance and environmental performance history relevant to Hi-Quality Waste Management Pty Ltd is provided below.

- In April 2017, the NSW EPA fined Hi-Quality Waste Management Pty Ltd a total of \$32,500 and issued an official caution relating to the Windellama Landfill for improper cover of waste and unlawful disposal of waste tyres outside the approved landfill cell.

Other than above, Hi-Quality Waste Management Pty Ltd has not:

- had any approval authorising exploration or production of quarry materials, or disposal of waste material, in any jurisdiction, refused, suspended, cancelled or revoked;
- been subject to prosecution under a provision for any work health and safety legislation; or
- had a licence or other authority suspended or revoked under the NSW *Protection of the Environment Operations Act 1997* or NSW *Environmental Planning and Assessment Act 1979*.

Hi-Quality Waste Management Pty Ltd is committed to maintaining responsible environmental management practices that meet industry best practice. Environmental management is an integral part of every stage of the landfill process to ensure that environmental impacts are minimised.

Hi-Quality Waste Management Pty Ltd has a Landfill Environmental Management Plan and Environmental Management System in place for its existing operations, including operations within the Action area. These guide the implementation of environment and community controls, procedures at the site.

As described in the Landfill Environmental Management Plan, Hi-Quality Waste Management Pty Ltd has developed a number of environmental management and monitoring plans which provide guidance for minimising the impacts of its operations. These existing plans already apply to the activities that are subject to this referral.

A copy of HiQ's Environmental Management Policy is provided in Attachment B to this Referral.

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

HiQ's Environmental Management Policy is provided in Attachment B to this Referral

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	25003105379
Organisation name	HI-QUALITY WASTE MANAGEMENT PTY LTD
Organisation address	PO Box 699 Hoxton Park NSW 2171

Proposed designated proponent details

Name	Lance Ingrams
Job title	Chief Strategy Officer
Phone	(02) 9826 1666
Email	lingrams@hiq.au
Address	PO Box 699 Hoxton Park NSW 2171

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	11664497198
Organisation name	VESSI PTY LTD
Organisation address	4151 QLD
Representative's name	Joe Fittell
Representative's job title	Principal Environmental Manager
Phone	0466445072
Email	joe@vessi.com.au
Address	South Brisbane, QLD, 4101

✔ 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.

ABN/ACN	25003105379
Organisation name	HI-QUALITY WASTE MANAGEMENT PTY LTD
Organisation address	PO Box 699 Hoxton Park NSW 2171
Representative's name	Lance Ingrams
Representative's job title	Chief Strategy Officer
Phone	(02) 9826 1666
Email	lingrams@hiq.au
Address	PO Box 699 Hoxton Park NSW 2171

✔ 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

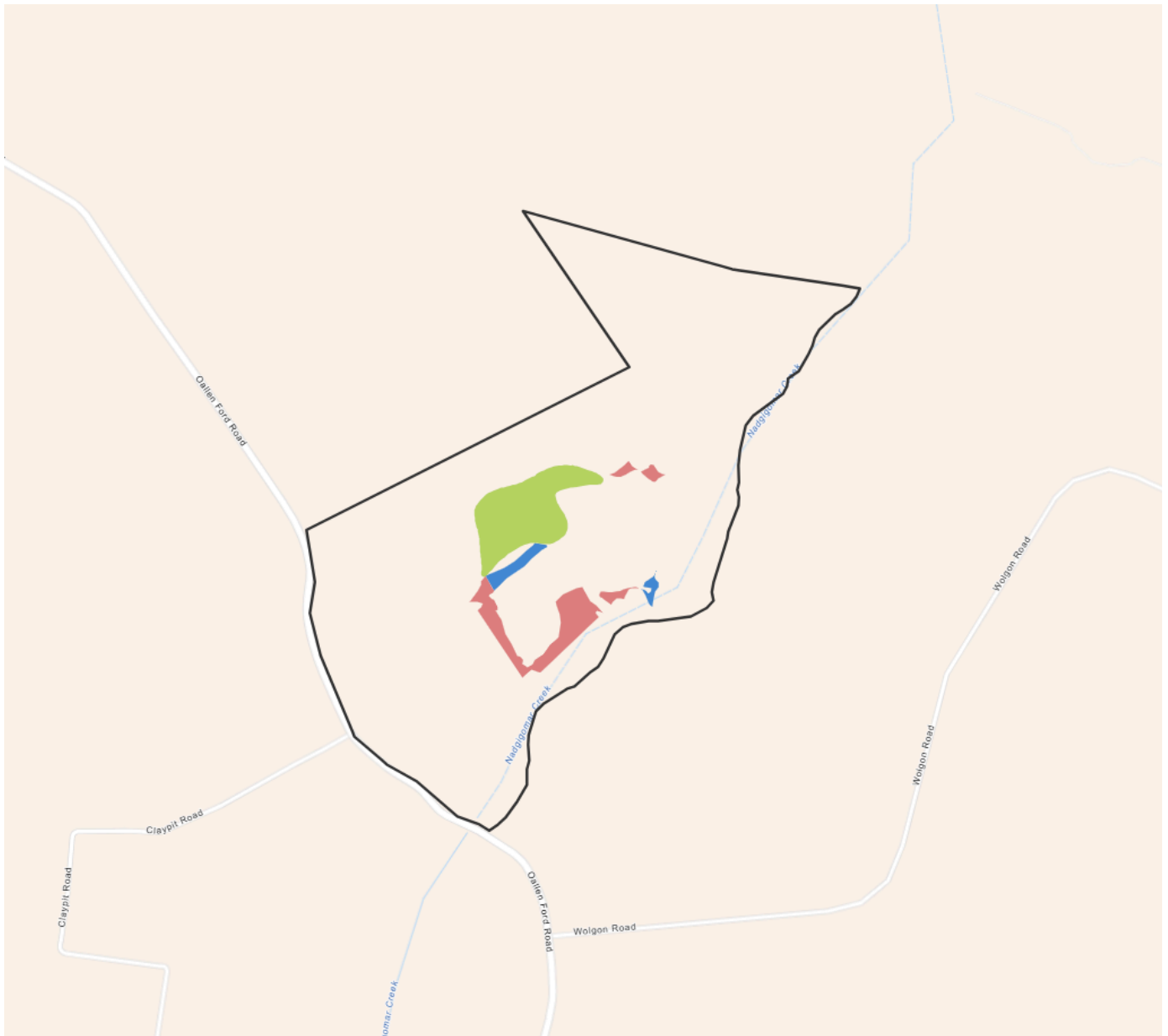
1.4 Payment details: Payment allocation

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

Person proposing to take the action

2. Location

2.1 Project footprint



Project Area: 175.08 Ha Disturbance Footprint: 4.68 Ha Avoidance Area: 1.13 Ha Retention Area: 7.92 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

2622 Oallen Ford Road Windellama NSW 2580

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

New South Wales

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 Action area is freehold land.

3. Existing environment

3.1 Physical description

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

The existing Windellama landfill is located approximately 7 km south of Windellama, and approximately 20 km east of Tarago in NSW. The surrounding landscape is generally comprised of rural properties characterised by undulating hills, with more dense vegetation to the north and east of the existing operations.

The proposed Action area contains remnant vegetation. There is an exclusion zone to the north of the existing development which has been established to protect the two threatened *Eucalyptus recurva* individuals. This area would not be disturbed by the Action (i.e. is not located within the Action area).

Previous surveys conducted over the Action area and immediate surrounds have identified the following introduced flora species (Biosis, in prep.):

- Shepherd's Purse (*Capsella bursa-pastoris*);
- Shivery Grass (*Briza minor*);
- Capeweed (*Arctotheca calendula*);
- Scarlet Pimpernel (*Lysimachia arvensis*);
- Sheep Sorrel (*Acetosella vulgaris*);
- White Horehound (*Marrubium vulgare*); and
- Blackberry complex (*Rubus fruticosus* sp. agg.).

A total of four introduced fauna species have also been recorded within the Action area and immediate surrounds (Biosis, in prep.). These include:

- Common Starling (*Sturnus vulgaris*);
- European Fox (*Vulpes vulpes*);
- European Rabbit (*Oryctolagus cuniculus*); and
- Feral Pig (*Sus scrofa*).

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

The site, where the Action is located, is already approved for use as a landfill. This land use would continue under the proposed Action.

The surrounding land uses comprise predominantly rural residential properties.

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 within the Action area or immediate surrounds.

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 ground surface in the area slopes gently from the north-west to south-east towards Nadgigomar Creek which roughly defines the south-eastern boundary of the site.

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.

Seasonal biodiversity surveys were undertaken across the Action area and wider surrounds in 2020 (Biosis, 2022).

These surveys covered the entire Action area and were undertaken in October, November and December 2020 and included (Figure 3a of Attachment A):

- terrestrial flora surveys, including:
 - ground-truthing plant community types;
 - assessing vegetation against listing criteria for threatened ecological communities; and
 - targeted threatened species transects;
- terrestrial fauna surveys, including:
 - diurnal bird surveys and habitat searches;
 - nocturnal spotlighting and call playback;
 - anabat call recording;
 - motion-sensing cameras;
 - Koala SAT searches; and
 - habitat assessments.

Targeted threatened flora and fauna surveys were undertaken in accordance with the following documents:

- *Threatened Biodiversity Survey and Assessment: Guidelines for Developments and Activities.*
- *Surveying threatened plants and their habitats NSW survey guide for the Biodiversity Assessment Method.*
- *'Species Credit' Threatened Bats and their Habitats: NSW Survey Guide for the Biodiversity Assessment Method.*
- *Survey Guidelines for Australia's Threatened Birds.*
- *Survey Guidelines for Australia's Threatened Mammals.*
- *EPBC Act Referral Guidelines for the Vulnerable Koala.*
- *Koala Habitat Protection Guideline.*
- *The Spot Assessment Technique: a tool for determining localised levels of habitat use by Koalas Phascolarctos cinereus.*

Importantly, more contemporary biodiversity surveys have been undertaken within the Site adjacent the Action area. These surveys have been conducted in accordance with the prescriptive requirements of the NSW BAM, and the relevant EPBC Act survey guidelines listed above in order to support the application for a larger expansion of the operations (subject to separate referral and assessment). These surveys have been undertaken in October, November, and December 2025, and February and March 2026 and have included:

- terrestrial flora surveys, including:
 - ground-truthing plant community types in accordance with the NSW BAM;
 - assessing vegetation against listing criteria for threatened ecological communities in accordance with relevant listing and conservation advice; and
- terrestrial fauna surveys, including:
 - diurnal bird surveys and habitat searches;
 - nocturnal spotlighting and call playback;
 - anabat call recording;
 - motion-sensing cameras;
 - Koala SAT searches; and
 - habitat assessments.

While these surveys have not occurred directly within the Action area, they have occurred within the vegetation immediately adjacent (to the west), noting this includes vegetation is contiguous with the habitat within the Action area. While additional surveys (and data analysis) are ongoing, the results collected over

the last five to six months, have largely validated the results of the original surveys from 2020. Further to this, the Action area is immediately adjacent the operational landfill and regularly traversed by site environmental personnel.

Importantly, no new TECs or threatened species have been recorded within the Site. The mapping provided on Figures 3B and 4 reflect all information collected to date across the Site.

HiQ notes that DCCEEW's website states the following in relation to the age of survey data[1] (emphasis added):

We generally can't accept survey data that's more than 5 years old because:

- *populations of species can change due to fires, drought, flooding and land management changes*
- *some species' ranges can shift due to climate change.*

While HiQ recognises the above, it is considered that the survey work undertaken to date provides a strong basis for determining the likelihood of occurrence of threatened species and communities within the Action area, given:

- the original survey effort within the Action area is only just over five-years old (i.e. approximately 5 years and 4 months);
- there have been no major fires, drought, flooding or land management changes within the Site that would affect species composition (as validated by the more recent survey work); and
- the more contemporary surveys undertaken in 2025 and 2026 have not identified any new TECs or threatened species records within the site, they have largely validated the previous survey findings.

Ultimately, HiQ considers that the ecological composition of the Action area is very well understood and further survey work is not required.

Threatened flora and fauna species and ecological communities identified and potentially impacted by the Action are detailed in Attachment A of this Referral (see Table 1 of Attachment A of this Referral).

Based on the survey work undertaken within the Action area, the following threatened species are known (or considered likely) to occur within the Action area (see Table 1 of Attachment A to this Referral):

- *Bossiaea oligosperma*; and
- *Leucochrysum albicans* subsp. *tricolor* (Hoary Sunray).

No threatened fauna species or ecological communities considered likely to occur within the Action area.

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

The Action area is comprised entirely of native vegetation. A total of approximately 4.7 ha of native vegetation has been mapped within the Action Disturbance Footprint (see Figure 3b of Attachment A of this Referral). While the original mapping prepared by Biosis (undertaken in 2020) used now superseded Plant Community Types (PCTs), updated mapping (using contemporary PCT allocations) has been prepared by Biosis (in prep.) in support of HiQ's proposed extension at the Site.

Contemporary mapping prepared by Biosis (pers comm.) has identified the following PCTs within the Action area (see Figure 3b of Attachment A of this Referral):

- PCT 3348 – Southern Tableland Granites Ribbon Gum Grassy Forest.
- PCT 3738 – Goulburn-Lithgow Tableland Hills Grassy Forest.
- PCT 3744 – Palerang Hills Peppermint Dry Shrub Forest.
- PCT 3746 – Southern Tableland Snow Gum-Candlebark Shrub Forest

Importantly, none of these PCTs conform to any threatened ecological communities listed under the EPBC Act.

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 Commonwealth Heritage Places within the Action area or its surrounds.

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

The surrounding locality was previously subject to archaeology surveys and reporting undertaken by Williams Barber Archaeological Services (1994) for the original Windellama Landfill EIS.

Williams Barber Archaeological Services (1994) concluded there is a high potential for the surrounding area to contain open artefacts scatters based on the presence of a permanent watercourse, aeolian sandsheets and gentle slopes which are common to many previously recorded sites in the region. As part of the archaeology surveys, two Aboriginal heritage sites were identified:

- AHIMS Site 57-3-0243 (Minda 1) – an open site type.
- AHIMS Site 57-3-0243 (Minda 2) – an open site type.

Neither of these sites are located within the Action area.

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 proposed Action is located in the Nerrimunga Creek catchment, which forms part of the Shoalhaven River catchment. The Shoalhaven River catchment drains some 7,250 km² of south-eastern NSW to the Pacific Ocean east of Nowra.

The Action area is located directly north of Nadgigomar Creek, a tributary of Nerrimunga Creek, which joins the Shoalhaven River approximately 45 km downstream of the site.

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 Action would not directly impact any World Heritage properties. The nearest World Heritage property is the Greater Blue Mountains Area, which is located over 100 km north of the Action area.

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.

—

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.

*

The Action would not directly impact any National Heritage places. The nearest National Heritage place is Old Parliament House and Curtilage, which is located over 70 km south-west of the Action area.

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.

—

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 Action would not directly impact any Ramsar Wetlands. The nearest Ramsar Wetland is the Towra Point Nature Reserve, which is located over 150 km north-east of the Action area.

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	<i>Anthochaera phrygia</i>	Regent Honeyeater
No	No	<i>Aphelocephala leucopsis</i>	Southern Whiteface
No	No	<i>Aprasia parapulchella</i>	Pink-tailed Worm-lizard, Pink-tailed Legless Lizard
Yes	No	<i>Bossiaea oligosperma</i>	
No	No	<i>Botaurus poiciloptilus</i>	Australasian Bittern
No	No	<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
No	No	<i>Calidris ferruginea</i>	Curlew Sandpiper
No	No	<i>Callocephalon fimbriatum</i>	Gang-gang Cockatoo
No	No	<i>Calyptorhynchus lathami lathami</i>	South-eastern Glossy Black-Cockatoo
No	No	<i>Chalinolobus dwyeri</i>	Large-eared Pied Bat, Large Pied Bat
No	No	<i>Climacteris picumnus victoriae</i>	Brown Treecreeper (south-eastern)
No	No	<i>Commersonia prostrata</i>	Dwarf Kerrawang
No	No	<i>Dasyurus maculatus maculatus</i> (SE mainland population)	Spot-tailed Quoll, Spotted-tail Quoll, Tiger Quoll (southeastern mainland population)
No	No	<i>Delma impar</i>	Striped Legless Lizard, Striped Snake-lizard
No	No	<i>Dodonaea procumbens</i>	Trailing Hop-bush
No	No	<i>Eucalyptus aggregata</i>	Black Gum
No	No	<i>Eucalyptus recurva</i>	Mongarlowe Mallee
No	No	<i>Falco hypoleucos</i>	Grey Falcon
No	No	<i>Gallinago hardwickii</i>	Latham's Snipe, Japanese Snipe
No	No	<i>Grantiella picta</i>	Painted Honeyeater

Direct impact	Indirect impact	Species	Common name
No	No	Haloragis exalata subsp. exalata	Wingless Raspwort, Square Raspwort
No	No	Hirundapus caudacutus	White-throated Needletail
No	No	Lathamus discolor	Swift Parrot
Yes	No	Leucochrysum albicans subsp. tricolor	Hoary Sunray, Grassland Paper-daisy
No	No	Litoria aurea	Green and Golden Bell Frog
No	No	Macquaria australasica	Macquarie Perch
No	No	Melanodryas cucullata cucullata	South-eastern Hooded Robin, Hooded Robin (south-eastern)
No	No	Neophema chrysostoma	Blue-winged Parrot
No	No	Phascolarctos cinereus (combined populations of Qld, NSW and the ACT)	Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory)
No	No	Polytelis swainsonii	Superb Parrot
No	No	Pomaderris cotoneaster	Cotoneaster Pomaderris
No	No	Pomaderris pallida	Pale Pomaderris
No	No	Pteropus poliocephalus	Grey-headed Flying-fox
No	No	Pycnoptilus floccosus	Pilotbird
No	No	Rhizanthella slateri	Eastern Underground Orchid
No	No	Rostratula australis	Australian Painted Snipe
No	No	Rutidosis leptorhynchoides	Button Wrinklewort
No	No	Stagonopleura guttata	Diamond Firetail
No	No	Thesium australe	Austral Toadflax, Toadflax

Ecological communities

Direct impact	Indirect impact	Ecological community
No	No	Natural Temperate Grassland of the South Eastern Highlands

Direct impact	Indirect impact	Ecological community
No	No	White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland

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. *

Based on the survey work undertaken to date across the Action area and surrounds, the following threatened species are known (or considered likely) to occur within the Action area (see Table 1 of Attachment A to this Referral) (see Figures 5 and 6 of Attachment A):

- *Bossiaea oligosperma*;
- *Leucochrysum albicans* subsp. *tricolor* (Hoary Sunray);

The Action would result in the removal of habitat for the above species, noting that individuals of both species have both been recorded within the Action area (see Attachment A of this Referral).

Importantly, no threatened fauna species or ecological communities have been within the Action area despite the extensive survey work that has been undertaken to date (see Figure 4 of Attachment A).

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. *

While HiQ considers the loss of habitat for these species would not likely result in a significant impact to the species in its own right, it is recognised that approval of the Action would facilitate the proposed larger expansion of operations at the Site, which (if approved) may result in additional impacts to these species. Noting that 'facilitated impacts' are a specific consideration within the Significant Impact Guideline, HiQ is willing to conservatively provide a biodiversity offset for the habitat clearance for this species in order to ensure the long-term protection of other known habitat for the species within the Site.

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. *

As outlined in Section 4.1.4.5, HiQ notes that 'facilitated impacts' are a specific consideration within the Significant Impact Guideline and it is recognised that approval of the Action would facilitate the proposed larger expansion of operations at the Site, which (if approved) may result in additional impacts to these species. Accordingly, HiQ considers that a 'Controlled Action' decision is appropriate for this Action.

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. *

As part of the Action, HiQ is committing to avoiding approximately 1.2 ha of native vegetation, including known and potential habitat for the two threatened flora species, which is already approved to be cleared under the NSW Development Consent (DA 989/130). The Action would also result in no additional clearance beyond the areas already approved to be cleared under DA 989/130.

Noting that operations at the site began in the 1980s, HiQ already implements a Landfill Environmental Management Plan and Environmental Management System in accordance with relevant licenses and consents. This includes implementation of environmental management measures within the Action area. These guide the implementation of environmental controls and procedures within the Site.

As described in the Landfill Environmental Management Plan, HiQ has developed a number of environmental management and monitoring plans which provide guidance for minimising the environmental impacts of its operations. These existing plans already apply to the clearing activities which are subject to this Referral and include the following measures to mitigate and manage potential residual impacts on biodiversity:

- Surface disturbance protocols (including demarcation of clearance areas, pre-clearance surveys and salvage of habitat features for use in rehabilitation activities).
- Progressive clearing of native vegetation to allow fauna species to move away from the clearing area.
- Implementation of environmental management plans, including weed and feral pest control measures.
- Other measures that are relevant to reducing potential indirect impacts on biodiversity, such as invasive species control, erosion and sediment, dust, noise, lighting and groundwater.

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

If the Action is approved, HiQ will provide a biodiversity offset for *Bossiaea oligosperma* and *Leucochrysum albicans subsp. Tricolor* in accordance with the *EPBC Act Environmental Offset Policy*.

Importantly, HiQ is already investigating the availability and location of a suitable Biodiversity Stewardship Area (BSA) for its proposed expansion of the operations (subject to separate referral and assessment) within the Site. These lands include more than 75 ha of native vegetation which provide known and potential habitat for both flora species (see Figures 5 and 6 of Attachment A of this Referral).

It is anticipated that, should an offset be required for these two flora species, HiQ would have sufficient land available within its current landholders to provide an offset in accordance with the *EPBC Act Environmental Offset Policy*.

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	<i>Actitis hypoleucos</i>	Common Sandpiper
No	No	<i>Apus pacificus</i>	Fork-tailed Swift
No	No	<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
No	No	<i>Calidris ferruginea</i>	Curlew Sandpiper
No	No	<i>Calidris melanotos</i>	Pectoral Sandpiper
No	No	<i>Gallinago hardwickii</i>	Latham's Snipe, Japanese Snipe
No	No	<i>Hirundapus caudacutus</i>	White-throated Needletail
No	No	<i>Motacilla flava</i>	Yellow Wagtail
No	No	<i>Pandion haliaetus</i>	Osprey

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.

*

The Action would not involve clearing of habitat for any migratory species. Further to this, no migratory species predicted to occur by the Protected Matters Search are considered to be at the limit of their known migratory ranges. The Action area would not impact an area of important habitat for any of these species.

The Action area does not contain any known breeding place for any migratory species, nor does it contain any potential foraging habitat migratory species, noting there are no areas of wetlands, claypans, saltmarshes or mudflats within the Action area.

By their nature migratory species is wide-ranging and the land undisturbed by the Action would provide a higher quality habitat for these species.

Further to the above, there are no migratory flyways located over the Action area. Migratory flyways correspond with the vast majority of Important Bird and Biodiversity Areas globally. The East Asia/Australasia Flyway extends from Arctic Russia and North America to the southern extents of Australia and New Zealand (Queensland Department of Environment, Science and Innovation, 2023).

This flyway predominately traverses the coastal extents of Australia, occasionally travelling inward through parts of Queensland, South Australia and Western Australia. The Action does not occur within the important extents of this flyway (i.e. coastal areas).

Given the information provided above, it is very unlikely that the Action will have a significant impact on a listed migratory species given it would not:

- *substantially modify (including by fragmenting, altering fire regimes, altering nutrient cycles or altering biological) cycles, destroy or isolate an area of important habitat for a migratory species;*
- *result in an invasive species that is harmful to the migratory species becoming established in an area of important habitat for the migratory species; or*
- *seriously disrupt the lifecycle (breeding, feeding, migration or resting behaviour) of an ecologically significant proportion of the population of a migratory species.*

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 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.

—

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.

*

The Action is not proposed to take place in a Commonwealth Marine Area.

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 Action would not directly or indirectly impact the Great Barrier Reef.

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 Action is not a large coal mining development or coal seam gas project.

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.

—

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.

*

There is no Commonwealth Land within the Action area.

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.

—

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 Action would not impact any places identified on the List of Overseas Places of Historic Significance to Australia (LOPHSA), including:

- Anzac Cove, Gallipoli;
- Kokoda Track, Papua New Guinea; and
- Howard Florey's Laboratory, Sir William Dunn School of Pathology, United Kingdom.

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. *

The location of the Action is completely constrained by the location and progression of the current operations (i.e. the purpose of this Referral is to seek EPBC Act approval for land already approved to be cleared under DA 989/130.

While HiQ has contemplated not proceeding with the vegetation clearance, this would result in the need to cease operations at the existing Site well before completion, severely impacting supply of clay material for brick making, and availability of landfill space for the community.

5. Lodgement

5.1 Attachments

1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att_A_Assessment_Impacts.pdf Assessment of impacts on MNES	13/04/2026	No	High

1.2.5 Information about the staged development

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att_A_Assessment_Impacts.pdf Assessment of impacts on MNES	12/04/2026	No	High

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

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att_B_HiQ_Env_Man_Policy.pdf HiQ Environmental Policy	13/04/2026	No	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_B_HiQ_Env_Man_Policy.pdf HiQ Environmental Policy	12/04/2026	No	High

3.2.1 Flora and fauna within the affected area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att_A_Assessment_Impacts.pdf Assessment of impacts on MNES	12/04/2026	No	High

3.2.2 Vegetation within the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att_A_Assessment_Impacts.pdf Assessment of impacts on MNES	12/04/2026	No	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_A_Assessment_Impacts.pdf Assessment of impacts on MNES	12/04/2026	No	High

5.2 Declarations

Completed Referring party's declaration

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

ABN/ACN	11664497198
Organisation name	VESSI PTY LTD
Organisation address	4151 QLD
Representative's name	Joe Fittell
Representative's job title	Principal Environmental Manager
Phone	0466445072
Email	joe@vessi.com.au
Address	South Brisbane, QLD, 4101

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

Check this box to confirm these are the correct identification details. *

By checking this box, I, **Joe Fittell of VESSI PTY LTD**, 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. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

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.

ABN/ACN	25003105379
Organisation name	HI-QUALITY WASTE MANAGEMENT PTY LTD
Organisation address	PO Box 699 Hoxton Park NSW 2171
Representative's name	Lance Ingrams

Representative's job title	Chief Strategy Officer
Phone	(02) 9826 1666
Email	lingrams@hiq.au
Address	PO Box 699 Hoxton Park NSW 2171

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

Check this box to confirm these are the correct identification details. *

I, **Lance Ingrams of HI-QUALITY WASTE MANAGEMENT PTY LTD**, 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. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

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. *

Check this box to confirm these are the correct identification details. *

I, **Lance Ingrams of HI-QUALITY WASTE MANAGEMENT PTY LTD**, 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. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

