Badgingarra Workers Accommodation Village

Application Number: **03246** Commencement Date: **02/12/2025** Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Badgingarra Workers Accommodation Village

1.1.2 Project industry type *

Commercial Development

1.1.3 Project industry sub-type

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1.1.4 Estimated start date *

04/05/2026

1.1.4 Estimated end date *

04/05/2027

1.2 Proposed Action details

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

Zephyr Energy Pty Ltd (the proponent) proposes to construct and operate the Badgingarra Workers Accommodation Village on the southern edge of the Badgingarra township in the Shire of Dandaragan, Western Australia (the proposed action) (refer **Att A- REDACTED, Figure 1**).

The proposed action will provide a fit-for-purpose, mid-scale workers accommodation facility to support construction of the approved 489 MW Parron Wind Farm, located approximately 11 km north of Badgingarra. The facility will accommodate the Parron Wind Farm construction workforce between late 2026 and late 2029. With a peak workforce of approximately 300 people, wind farm construction would place significant pressure on existing local accommodation infrastructure throughout the region if temporary accommodation is not provided. Construction of the accommodation village is expected to occur over 6-9 months, with operations commencing Q4 2026.

The facility will operate for approximately 10 years, initially housing the Parron Wind Farm workforce for three years before being handed over to the Yued Aboriginal Corporation (YAC) for ongoing management. This will provide YAC with a long-term commercial opportunity through income generation, asset ownership, and skills development. Beyond the wind farm construction phase, the facility may support other renewable energy or infrastructure projects or be repurposed for short-stay accommodation for tourism, regional events, or seasonal workers.

Broader social and economic benefits include:

- Increased local expenditure on goods and services during both construction and operational phases, including fuel, food supplies, services, and hospitality.
- Short-term employment opportunities during construction and longer-term operational roles and services, with a preference for local businesses and contractors.
- Reduced pressure on existing accommodation and infrastructure in Badgingarra, Jurien Bay and Dandaragan caused by the influx of workers.

The project area covers approximately 3.9 hectares (ha) of Unallocated Crown Land (UCL) (PIN 10500435). The land is reserved for the Noongar Boodja Trust under the South West Native Title Settlement and is intended to enter the Noongar Land Estate for the benefit of the Yued People.

The site is bounded by agricultural and light industrial land and remnant native vegetation to the south and east, commercial and tourism land uses to the north, and Brand Highway and Badgingarra National Park to the west. The location and extent of the project area is shown in **Att A - REDACTED, Figure 1**.

The development concept has been prepared in consultation with, and the support of YAC and the Department of Planning, Lands and Heritage (DPLH) as the Crown's landowner representative. A letter of support from YAC and landowner consent from DPLH has been provided as **Att C - REDACTED** and **Att D - RECACTED**, respectively.

The project area comprises a 3.39 ha disturbance footprint and a 0.5 ha avoidance area. Approximately 2.89 ha of native vegetation will be cleared as part of the proposed action. The remainder of the project area consists predominantly non-native vegetation and disturbed land, including Reimers Street, access tracks and firebreaks.

The disturbance footprint represents a worst-case scenario for planning and environmental approvals. Further optimisation during detailed design may allow retention of additional pockets of native vegetation within the project area. The project area, avoidance area, and disturbance footprint are illustrated in **Att A - REDACTED, Figure 2.**

The Proposed Action comprises the construction and operation of a workers accommodation village consisting of the following key components:

- Accommodation units: 75 four-bedroom single storey modules, providing 300 rooms
- Ancillary infrastructure including:

    - Kitchen and dining building: facilities for food storage and preparation, with seating capacity for 210 people.
    - Laundry building: washing and drying facilities, along with linen and cleaning storage areas.
    - Administration building: three offices, several open plan workstations, and a tea preparation room.
    - Car parking: one car park with 75 private vehicle parking bays.
    - Bus parking: five designated bus parking bays.
    - Wastewater treatment system: onsite wastewater treatment plan (WWTP) with disposal via septic tanks with lead drains.
    - Potable water storage: two 50,000 litre (L) water tanks with fire water booster pumps, providing total storage capacity of 100,000 L.
    - Fire water storage: two 50,000 L water tanks with fire water booster pumps, providing total storage capacity of 100,000 L.
- Asset protection zone (APZ): 21 metre (m) wide APZ along the inside of the northern, western and eastern boundary of the site. An additional APZ will be established and maintained between retained vegetation within the avoidance area and accommodation buildings. These areas provide the required hazard separation to ensure all habitable buildings achieve a maximum bushfire attack level (BAL) of BAL-19 and also maintain clear, trafficable access for emergency service vehicles to safely approach and suppress fire within adjacent vegetation during a bushfire event.
- Avoidance area: retention native vegetation within a designated avoidance area to respond to identified environmental values. An additional APZ will be established and maintained in the southern portion of the site between the avoidance area and accommodation buildings, maintaining a minimum buffer distance of 15 m.

The development layout is shown in **Att A - REDACTED, Figure 3**.

Key activities and potential impacts associated with the proposed action are outlined below. Where impacts may occur, they are expected to be localised, temporary, and managed through design and standard environmental controls.

- Pre-construction activities
    - Flora and fauna surveys
    - Planning and environmental approvals
    - Detailed design and site investigations
    - Establishment of environmental controls and exclusion zones.
- Construction activities
    - Demarcation of the avoidance area to prevent direct impacts and minimise indirect impacts during construction.
    - Clearing of approximately 2.89 ha native vegetation, resulting in localised permanent loss of native vegetation and fauna habitat, including foraging habitat for Carnaby’s black cockatoo.
    - Earthworks and trenching, with temporary risks of erosion, compaction, sedimentation, dust generation and fauna entrapment.
    - Installation of accommodation modules and ancillary buildings and infrastructure, generating short term noise, dust, as well as traffic and visual amenity impacts.
    - Construction of internal roads and parking areas leading to minor changes in surface water runoff.
- Operation and maintenance
    - Ongoing human presence, lighting and amenity use that is consistent with surrounding residential, commercial and tourism land uses within the Badgingarra townsite.
    - Vehicle movements generating low-level traffic and noise impacts that are not expected to materially alter existing traffic conditions.
    - Groundwater abstraction for non-potable water supply, undertaken in accordance with a licence issued under the *Rights in Water and Irrigation Act 1914*, ensuring abstraction remains

within licence limits.
    - Operation of the WWTP in accordance with regulatory requirements.
    - Routine maintenance of buildings and infrastructure, resulting in minor, localised and short-term disturbance, most likely through the generation of noise.
    - Routine inspection and maintenance of avoidance area fencing and signage to prevent unauthorised access and minimise edge effects.
- Decommissioning and rehabilitation
    - Removal of accommodation modules and ancillary infrastructure, resulting in temporary noise, dust and ground disturbance comparable to construction activities.
    - Stabilisation and rehabilitation of disturbed areas, subject to future land use requirements.
    - Rehabilitation of cleared areas where practicable, to re-establish vegetation cover and reduce long-term impacts, subject to future land use and landowner requirements.
    - Maintain avoidance area fencing to throughout decommissioning and rehabilitation to prevent disturbance, unauthorised access and minimise edge effects.

No infrastructure upgrades outside of the project area (e.g. road widening) are proposed as part of the proposed action.

The proposed action will involve vegetation clearing, earthworks, construction activities, noise, traffic movements and ongoing operational activities, which have the potential to directly or indirectly impact the environment.

Construction activities described above will result in the clearing of approximately 2.89 ha of native vegetation, predominantly in ‘excellent’ condition, providing foraging habitat for Carnaby’s black cockatoo, a Matter of National Environmental Significant (MNES). As such, the proposed action will result in a direct loss of MNES habitat through vegetation clearing.

Environmental impacts will be managed through an overarching environmental management framework, including:

- Establishment and protection of an avoidance area.
- A *Construction Environmental Management Plan* (CEMP) detailing adaptive management measures and addressing landforms, soils and geology, and erosion control.
- A *Water Management Strategy* (WMS) to guide stormwater and groundwater management during construction and operation.
- Groundwater abstraction in accordance with an approved groundwater licence under the *Rights in Water and Irrigation Act 1914*.
- A *Fauna Management Plan* including pre-clearing fauna inspection, spotter and hygiene protocols.
- Management of visual impact through low-profile, single-story buildings and recessive colours.
- Construction noise management within approved hours and use of noise suppression measures.
- Traffic management measure to minimise impacts on public roads.
- Compliance with the *Bushfire Management Plan* ‘acceptable solution’ for each of the bushfire protection criteria through the establishment of an asset protection zone (APZ), which provides the necessary separation from external classified vegetation.

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? *

Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) provides for the protection of MNES, and it is an offence to implement any action that would have or is likely to have a significant impact on any MNES. If a proponent believes their proposed action (i.e. the proposal) is likely to have a significant impact on any MNES, then they are required to refer the proposal to the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

The project area associated with the Badgingarra Workers Accommodation facility has been assessed for the presence and likelihood of occurrences of MNES using the *Protected Matters Search Tool* (PMST), supplemented by targeted ecological surveys and assessments where a potential likelihood of occurrence was identified. The potential impacts of the proposed action have been assessed against the EPBC Act *Significant Impact Guidelines 1.1 - Matters of National Environmental Significance* and the *Referral Guideline for 3 WA Threatened Black Cockatoo Species*.

While clearing of 2.89 ha of black cockatoo foraging habitat exceeds the referral threshold included in the *Referral Guideline for Three WA Threatened Black Cockatoo Species*, it is not considered to be a significant impact based on assessment against the EPBC Act *Significant Impact Guidelines 1.1*. This is largely due to the small scale of clearing, absence of breeding or roosting habitat, and extensive surrounding foraging habitat. Standard management measures, including pre-clearing fauna inspections and spotter-catcher protocols, will be implemented to minimise risks to fauna. The Proponent is progressing an EPBC Act referral to secure regulatory and investment certainty.

Environmental Protection Act 1986 (WA)

Part IV Section 38(1) of the *Environmental Protection Act 1986* (EP Act) provides that, where a proposal is likely to have a significant effect on the environment, a proponent may refer the proposal to the Environmental Protection Authority (EPA) for a decision on whether or not it requires formal assessment under the EP Act. The EPA then decides whether a proposal should be assessed, and which level of assessment is appropriate, based on consideration of and environmental significance framework guided by EPA policy on environmental factors.

Based on investigations undertaken to date and the nature and scale of the Proposed Action, it is considered that potential impacts to EPA environmental factors can be adequately managed to meet the EPA's objectives through appropriate design and site management measures. Potential environmental impacts will also be addressed through other regulatory pathways, including local planning approval and referral under the EPBC Act. As a result, the Proposed Action is not being referred to the EPA for formal assessment under Part IV of the EP Act.

Planning and Development Act 2005

The Shire of Dandaragan is the relevant local planning authority, and the project area is subject to the Shire's Local Planning Scheme No. 7. To enable the implementation of the Proposed Action, the Proponent has submitted a Development Application with the Shire of Dandaragan seeking approval for the development of the Badgingarra Workers Accommodation Village.

WA - other legislation, policy documents or guidelines

In addition to the primary approvals under the EPBC Act and EP Act, the Proposed Action may also require various secondary approvals and consents under other WA legislation, including:

- *Aboriginal Heritage Act 1972 (AH Act)* – Approval for activities that may impact or harm Aboriginal heritage sites require an approval. It is unlikely that there will be a risk of harm to Aboriginal heritage from the Proposed Action and it is currently not envisaged to be required.
- *EP Act (Part V) Works Approval and License* - A works approval to construct and a license to operate would be required for the Proposed Action if any part is classified to be a 'prescribed premises' (i.e. wastewater treatment infrastructure). This will be confirmed during detailed design.

- *Road Traffic (Vehicles) Regulations 2014 and Road Traffic (Vehicles) Act 2012* - Permit for access to state roads / Main Roads WA Heavy Vehicle Operations Branch for transportation of Over Size Over Mass Vehicles (OSOM) for accommodation modules, ancillary buildings or other infrastructure.
- *Road Traffic (Vehicles) Regulations 2014 and Road Traffic (Vehicles) Act 2012* - Permits for access to local roads for transportation of Over Size Over Mass Vehicles (OSOM) for accommodation modules, ancillary buildings or other infrastructure.
- *Rights in Water and Irrigation Act 1914 RIWI Act* – Water licences are required to extract surface or non-artesian groundwater in proclaimed areas or to extract artesian groundwater in any areas in WA. Water abstraction for construction and operation (if required) would necessitate a *5C licence to abstract water (DWER) and 26D licence to construct a bore (DWER)* – as Proclaimed GW/SW area.
- *Biodiversity Conservation Act 2016 (BC Act)* – The BC Act provides protection for biodiversity, particularly threatened species and threatened ecological communities (TECs). Approvals would be required if the Proposed Action was going to 'take' a listed threatened species or 'modify' a TEC under the BC Act.
- *Dangerous Goods Safety Act 2004* – relates to the safe storage, handling and transport of dangerous goods and for related purposes. An approval will be required if dangerous goods are to be transported to or stored within the site.
- *Environmental Protection (Noise) Regulations 1997 (WA)* – construction and operational noise need to be managed so as to not exceed assigned levels at sensitive receptors as specified in the regulations.
- *Bushfires Act 1954* – The Shire of Dandaragan releases a Fire Break and Hazard Reduction Notice on an annual basis to provide a framework for bushfire management within the Shire. The Shire of Dandaragan are able to enforce this notice in accordance with Section 33 of the *Bush Fires Act 1954*.

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. *

A wide range of consultation has been undertaken with a range of stakeholders as listed **Att E – REDACTED, Table 1**. In summary this has included (but not limited to) the following:

- YAC
- DPLH
- The Shire of Dandaragan
- The Department of Water and Environmental Regulation (DWER)
- The Department of Climate Change, Energy, Environment and Water (DCCEEW) via an EPBC Act pre-referral meeting
- The Badgingarra community through open community forums
- Advertisement of the Development Application and referral to government agencies including DWER and DBCA.

1.3.1 Identity: Referring party

Privacy Notice:

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

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.

The Department of Climate Change, Energy, the Environment and Water (the department) collects your personal information (as defined by the Privacy Act 1988) through this platform for the purposes of enabling the department to consider your submission and contact you in relation to your submission. If you fail to provide some or all of the personal information requested on this platform (name and email address), the department will be unable to contact you to seek further information (if required) and subsequently may impact the consideration given to your submission.

Personal information may be disclosed to other Australian government agencies, persons or organisations where necessary for the above purposes, provided the disclosure is consistent with relevant laws, in particular the Privacy Act 1988 (Privacy Act). Your personal information will be used and stored in accordance with the Australian Privacy Principles.

See our Privacy Policy to learn more about accessing or correcting personal information or making a complaint.

Alternatively, email us at privacy@dcceew.gov.au.

☑ **Confirm that you have read and understand this Privacy Notice ***

1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details

ABN/ACN	57144772510
Organisation name	Emerge Environmental Services Pty Ltd
Organisation address	26 Railway Road, Subiaco, 6008

Referring party details

Name	Jason Hick
Job title	Director, Principal Environmental Consultant
Phone	08 9380 4988
Email	jason.hick@emergeassociates.com.au
Address	Suite 4, 26 Railway Road, Subiaco WA 6008

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	29618978082
Organisation name	ZEPHYR ENERGY PTY LTD
Organisation address	Level 9, 123 Pitt Street, Sydney NSW 2000

Person proposing to take the action details

Name	Tim Stevenson
Job title	Director
Phone	0427008096
Email	tim@parron.com.au
Address	Level 9, 123 Pitt Street, Sydney NSW 2000

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. *

The Proponent (Zephyr Energy) is a partnership between the Parron Wind Farm landowner and Atmos Renewables, established to jointly develop the Parron Wind Farm (EPBC 2024/10062). The Parron Wind Farm project was the first of Zephyr Energy's development phase projects to undergo an EPBC Act Referral and was determined to be not a controlled action on 6 May 2025.

To support construction of the Parron Wind Farm project, Zephyr Energy is also proposing the Badgingarra Workers Accommodation Village. Zephyr Energy will construct, own and operate the accommodation facility for the duration of the Paron Wind Farm construction period (approximately 3 years). Upon completion of the wind farm construction, ownership and operation of the accommodation facility will be ceded to YAC.

Established in Igneo Infrastructure Partners, a specialist global investment management company with over 25 years' experience in infrastructure, Atmos Renewables develops and invests in renewable energy projects at all stages of their lifecycle and is a long-term owner and operator of clean generation and storage assets.

Atmos Renewables was established in 2020 through the acquisition of operating assets and development of a renewable energy project pipeline through Joint Development Agreements, such as that with Zephyr Energy, and internally developed projects.

In addition to the Parron Wind Farm project (EPBC 2024/10062), Atmos Renewables' Senior Environmental Manager Kate Munro has been involved in the following EPBC Act matters:

- Mortlake Wind Farm EPBC 2008/4128
- Exmoor Wind Farm EPBC 2011/6117
- Daroobalgie Solar Farm EPBC 2021/9020

Zephyr Energy and Atmos Renewables have a sound and satisfactory environmental record of responsible environmental management. There are no past or current proceedings under either Commonwealth, State or Territory Law for the protection of the environment or the conservation and sustainable use of natural resources against Zephyr Energy or Atmos Renewables.

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

Atmos Renewables will be the key party progressing the construction and operation of the Proposed Action. The Atmos Renewables Environmental Policy (**Att B – Atmos Renewables Environmental Policy**) has been attached, and outlines the approach taken to drive environmental performance. In summary this requires that Atmos Renewables will:

- Comply with applicable legal obligations and related planning and environmental approval conditions associated with our projects/assets.
- Develop and operate projects in accordance with the Clean Energy Council's Best Practice Charter, to which Atmos is a signatory.
- Undertake a thorough due diligence assessment during the site selection phase to reduce the likelihood that projects will have a significant impact on protected areas, native vegetation and threatened species.
- Identify areas of environmental sensitivity for each project site and avoid these areas during the project design, to the extent possible.
- Implement relevant environmental protection measures during construction and operations.
- Invest in environmental protection and enhancement measures to ensure projects have an overall positive impact on biodiversity.
- Regularly engage with employees and stakeholders to identify opportunities for reducing environmental impacts, promote environmental awareness, and enhance environmental outcomes.
- Establish protocols for rapid response to environmental incidents to effectively mitigate impacts.
- Adopt measures to identify and ensure the efficient use of resources and energy, and minimisation of emissions and waste.
- Provide employees with the necessary resources and training to fulfill their environmental responsibilities.
- Responsibly decommission projects when they reach the end of their lifecycle, allowing sites to be restored or regenerated.

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	29618978082
Organisation name	ZEPHYR ENERGY PTY LTD
Organisation address	Level 9, 123 Pitt Street, Sydney NSW 2000

Proposed designated proponent details

Name	Tim Stevenson
Job title	Director
Phone	0427008096
Email	tim@parron.com.au
Address	Level 9, 123 Pitt Street, Sydney NSW 2000

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	57144772510
Organisation name	Emerge Environmental Services Pty Ltd
Organisation address	26 Railway Road, Subiaco, 6008
Representative's name	Jason Hick
Representative's job title	Director, Principal Environmental Consultant
Phone	08 9380 4988
Email	jason.hick@emergeassociates.com.au
Address	Suite 4, 26 Railway Road, Subiaco WA 6008

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	29618978082
Organisation name	ZEPHYR ENERGY PTY LTD
Organisation address	Level 9, 123 Pitt Street, Sydney NSW 2000
Representative's name	Tim Stevenson
Representative's job title	Director
Phone	0427008096
Email	tim@parron.com.au
Address	Level 9, 123 Pitt Street, Sydney NSW 2000

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

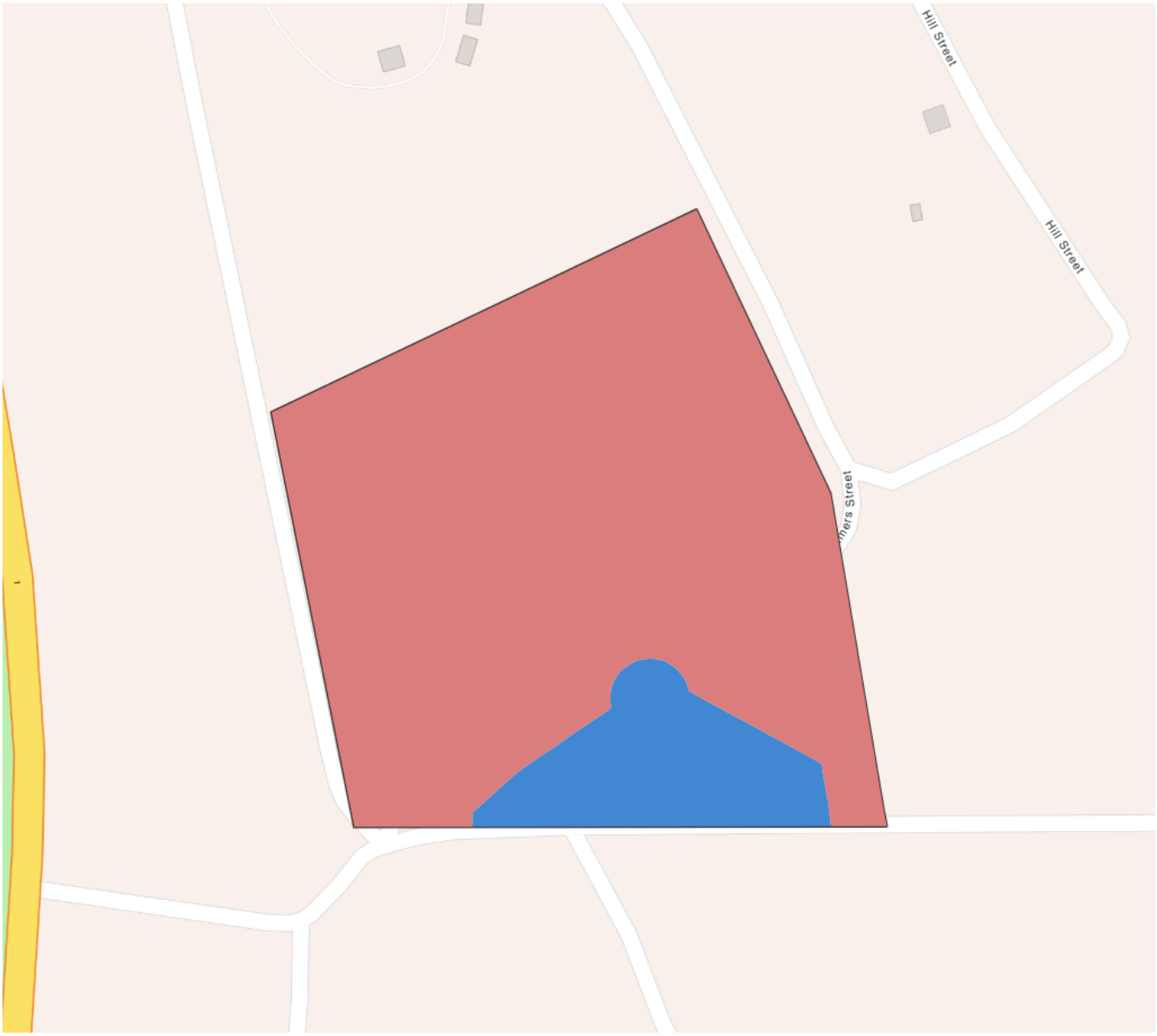
1.4 Payment details: Payment allocation

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: 3.90 Ha **Disturbance Footprint:** 3.40 Ha **Avoidance Area:** 0.50 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

UCL opposite 23 Reimer Street, Badgingarra, Western Australia

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 encompasses the entire untitled parcel (3.9 ha) of UCL (PIN 10500435) which is not currently utilised for any specific purpose. The land is reserved for the Noongar Boodja Trust under the South West Native Title Settlement and has been approved for transfer to the Noongar Boodja Trust, benefiting YAC.

3. Existing environment

3.1 Physical description

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

The proposed action is located on the southern edge of the Badgingarra township in the Shire of Dandaragan, Western Australia. Badgingarra is a small regional township within the northern Wheatbelt region of Western Australia, located approximately 180 km north of the Perth central business district, which is the nearest major metropolitan centre.

The site is located in a mixed landscape of predominantly native vegetation, interspersed with cleared residential, tourism, commercial, and light industrial land uses within the Badgingarra townsite. Beyond the townsite, the surrounding landscape has been extensively cleared for low-intensity agricultural activities since the 1950s, primarily for wheat and sheep farming, with subsequent introduction of crops such as canola and lupins. Agriculture is a vital part of the local economy, with many farms operating on an extensive (large) scale.

The project area itself comprises predominantly native vegetation, with minor disturbance associated with the construction of Reimers Street, which bisects the site, as well as other access tracks and a firebreak along the northern, southern and western boundary. There are no existing dwellings or built structures within the project area.

Despite extensive historical clearing across the broader region, the majority of the project area retains native vegetation in ‘excellent’ condition, encompassing approximately 3.24 ha (83%) of the project area. One small area (0.04 ha, 1.03%) was mapped as ‘very good’ condition due to evidence of disturbance associated with historical clearing under power lines. The remaining areas were mapped as ‘good’ (0.27 ha, 7.04%) or ‘completely degraded’ (0.34 ha, 8.77%) condition due to evidence of disturbance associated with historical clearing, which has resulted in altered vegetation structure, increased weed presence and reduced native species diversity. However, the area mapped as ‘good’ condition, while significantly altered by firebreak clearing, retains the capacity to regenerate and demonstrates relatively high species diversity, consistent with the ‘good’ condition classification under the EPA (2016) condition scale as adapted from Keighery (1994).

Native vegetation within the site comprises sandplain and laterite rise habitats which would contain the highest diversity and abundance of fauna. These areas are contiguous with extensive patches of similar habitat that extend outside of the project area which provide a contiguous ecological linkage. It provides a range of microhabitats suitable for reptiles and vegetation which would provide shelter and food resources for a number of bird species. The predominantly cleared areas provide low habitat value and would support mostly common and widespread species found throughout the wider region.

The full extent of native vegetation within the site (3.28 ha), including both sandplain and laterite rise fauna habitat, represents high quality black foraging habitat for Carnaby’s black cockatoo (*Zanda latirostris*) (see **Att A - REDACTED, Figure 8**). Habitat for the species within the site is limited to foraging habitat, with no suitable nesting or roosting trees present.

The Detailed Flora and Vegetation Assessment completed by Emerge Associates (**Att G - REDACTED**) concluded that the site does not support any Threatened Ecological Communities (TECs) or confirmed threatened flora species. A total of one unconfirmed species that could not be discounted as being a threatened species and 15 priority species were recorded within the project area (**Att K – Threatened and Priority Flora Species**). The single unconfirmed potentially threatened species comprised one individual of *Thelymitra ?stellata*, which is discussed further in the ‘Impact details (Threated Species and Communities)’ section.*Thelymitra ?stellata* has been listed with a question mark in **Att K** as its occurrence has not been confirmed.

The project area is within the Hill River Catchment area. The Hill River, a major tributary, passes approximately 2 km to the north of the site, before continuing north westward to the north of the site. No major or minor tributaries intersect the site.

The land encompassed within the project area has been offered to YAC as part of the future Noongar Land Estate under the South West Native Title Settlement and is intended to enter the Noongar Land Estate for the benefit of the Yued People. A letter of support from YAC and DPLH has been provided as **Att C - REDACTED** and **Att D - REDACTED** respectively. The proposed development is intended to deliver long term economic, social and capacity building benefits for the Yued People through income generation, asset capitalisation, and skills development.

The project area is currently zoned 'Public Purposes – Unvested Crown Land' under the Shire of Dandaragan's Local Planning Scheme No. 7 (LPS 7). No R-Codes, restricted uses, or additional uses apply to the site.

The project area's current reservation does not clearly articulate the intended future use of the land. As the Shire of Dandaragan is currently undertaking a scheduled review of LPS 7, the proponent has proposed that any required zoning or reservation amendments be considered as part of this process. This may include consideration of the project area for inclusion within the adjacent 'tourist' zone to the north.

Land use zoning adjoining the project area includes:

- 'Tourist' zoning immediately to the north
- Road reserve and 'Conservation' zoning to the west, associated with the Badgingarra National Park
- 'Public Purposes – Water' zoning immediately to the south
- A combination of 'Industrial' and 'Public Purposes – Unvested Crown Land' to the east

The broader Badgingarra townsite includes land zoned for Residential, Commercial, Industrial and Parks and Recreation uses, while land beyond the townsite is predominantly zoned Rural and used for agricultural purposes.

The project area is accessed via the Brand Highway, located west of the project area (refer to **Att A - REDACTED, Figure 1**). From Brand Highway, access is provided via Meagher Drive and Reimers Street.

Reimer Street is currently unsealed and provides local access through the project area. To accommodate increased traffic volumes associated with implementation of the action, Reimers Street is proposed to be sealed in the future and will connect to the main site entry located at the north-eastern corner of the project area, proving access to internal roads, car parking, and a designated bus parking area.

The sealing of Reimer Street does not form part of the proposed action. Any sealing works would be undertaken separately by the Shire of Dandaragan and are not associated with the proposed action included in this referral. Accordingly, the sealing of Reimers Street has not been included within the project area as it does not constitute a component of the action being referred and is not anticipated to result in additional environmental impacts beyond those associated with the proposed action.

No upgrades to the Meagher Drive/Brand Highway intersection are required.

During operation, workers will be transported between the Parron Wind Farm and the accommodation village via five 50-seater buses, supplemented by private vehicles where required. The accommodation village will include 75 car parking bays and five designated bus bays. At peak operation, the development is expected to generate approximately 58 two-way vehicle trips during the morning (6:00am to 7:00am) and evening (6:00pm to 7:00pm) periods. These peak movements will not coincide with the typical midday peak traffic periods on Brand Highway.

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

The proposed action is located on the southern edge of the Badgingarra township in the Shire of Dandaragan, Western Australia. The project area is zoned ‘Public Purposes - Unvested Crown Land’ under the Shire of Dandaragan’s Local Planning Scheme No. 7. No R-codes, restricted uses or additional uses apply to the area.

The project area is not currently utilised for a specific purpose and there are no dwellings, buildings or operational facilities within the site. The only existing infrastructure is Reimers Street, which intersects the site and provides local access.

Surrounding land uses comprise a mix of:

- Agriculture (broad-scale cropping and grazing) beyond the Badgingarra townsite
- Tourism uses to the north
- Industrial land uses to the east
- Residential land uses within the Badgingarra township
- Conservation land to the west associated with Badgingarra National Park, located on the opposite side of Brand Highway

A review of historical images available from 2000 onwards show the site has been predominantly native vegetation with only minor clearing completed prior to 2000 for the construction of Reimers Street and a firebreak on the northern boundary of the lot. Since this time, the extent of native vegetation within the site has remained relatively stable with widening of the firebreak occurring between 2016 and 2023 (WALIA 2026).

The proposed future use of the project area includes the operation of a fit-for-purpose, mid-scale workers’ accommodation facility to support the construction of the approved 489 MW Parron Wind Farm, located approximately 11 km north of Badgingarra.

The accommodation facility is anticipated to house the Parron Wind Farm construction workforce between late 2026 and late 2029. The facility will operate for an overall period of approximately 10 years, initially supporting wind farm construction activities for approximately three years, after which it will be handed over to YAC for ongoing management.

This arrangement is intended to provide an enduring commercial opportunity for the Yued People, including long-term income generation, asset ownership, and skills and capacity building. The facility has been designed to allow for future adaptive reuse, including supporting other renewable energy projects or being repurposed for short-stay accommodation associated with tourism, regional events, or seasonal workers, thereby providing ongoing regional economic and social benefits.

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

Badgingarra National Park lies immediately west of the project area, on the opposite side of Brand Highway, which was established in 1973 (see **Att A - REDACTED, Figure 4**). The National Park is approximately 17,600 ha of mostly low scrub with a high diversity of endemic wildflowers. Fauna such as western grey kangaroos, emus, bustards and wedge-tailed eagles inhabit the National Park.

Soil landscape mapping by DPIRD (DPIRD 2022) indicates two units occur within the project area with the most abundant system being Yerramullah 2 Subsystem which covers the western portion of the site and comprises plateau residuals, very gently to gently inclined hillcrest and hillslopes; pale and sandy gravels, shallow gravel over duricrust, gravelly pale deep sand, pale and yellow deep sands (see **Att A - REDACTED, Figure 5**)**.** Yerramullah 3 slopes Phase covers the eastern portion of the site and comprises colluvial slopes; pale and yellow deep sands, pale sandy gravels, shallow gravel over duricrust, some sandy duplexes and sandy earths.

The project area does not contain any restricted landforms or unique geological features.

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 site is characterised as generally flat with portions of the site including undulating terrain, resulting from natural sand dunes. The site generally falls from the south to the north with the highest point on the central southern boundary at 226 metres Australian Height Datum (m AHD). From this high point, the land slopes down to the west, north and south, with the lowest point being at 216 m AHD in the north, as illustrated in **Att A - REDACTED, Figure 5.**

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.

The proponent engaged Emerge Associates to undertake an initial *Flora, Vegetation and Fauna Assessment* to determine broad flora, vegetation and fauna values within the site to inform development considerations and additional survey requirements. A field survey was undertaken on 24 June 2025, documenting vegetation condition, opportunistic fauna and flora records, plant communities and fauna habitat, with particular focus on habitat for threatened fauna *Zanda latirostris* (Carnaby's black cockatoo).

A subsequent *Basic Fauna and Targeted Black Cockatoo Assessment* was undertaken to determine the presence and extent of threatened and priority fauna species (see **Att F – Basic Fauna and Targeted Black Cockatoo Assessment**) (Emerge Associates 2026a). Field surveys for this assessment were carried out on the 15 September 2025.

A *Detailed Flora and Vegetation Assessment* (see **Att G – REDACTED**) was also completed by Emerge Associates, including desktop studies and field surveys to examine the project area's environmental context, threatened flora, and ecological communities. Field surveys were completed on 17 July, 26 August, 1, 15-16 September and 15-16 October 2025. Surveys targeted vegetation composition, condition and conservation significant flora during relevant flowering periods.

Plant communities

Plant communities identified in the Emerge Associates (**Att G**) assessment are listed in **Att H – Plant Communities** and their spatial extent across the project area shown in **Att A - REDACTED, Figure 8**.

Vegetation condition

Vegetation condition mapping (**Att I – Vegetation Condition**; **Att A - REDACTED, Figure 9**) indicates that 3.24 ha (83.16%) of the site comprises remnant native vegetation in 'excellent' condition, with low disturbance and high native species diversity. A small area (0.04 ha; 1.03%) was mapped as 'very good', while 0.27 ha (7.04%) was 'good' and 0.34 ha (8.77%) 'completely degraded', reflecting historical disturbance associated with clearing, firebreaks, Reimers Street and access tracks.

Threatened and priority ecological communities

The desktop search using the *Protected Matters Search Tool* and DBCA's TEC and PEC database (reference no. 18-0725EC) identified three (3) threatened ecological communities (TECs) and two (2) priority ecological communities (PECs) occurring or potentially occurring within a 30 km radius of the project area as detailed in **Att J – Likelihood of Occurrence, Table 3. Pg. 13**.

Field surveys confirmed a 'nil' likelihood of occurrence within the project area.

Threatened and priority flora species

Emerge Associates (**Att G - REDACTED**) identified 34 threatened and 106 priority flora species within 20 km of the project area using the DCCEEW Protected Matters Search Tool and various databases. Of these, 14 threatened and 64 priority flora were classified as having a 'high' or 'moderate' likelihood of occurrence. The remaining species were classified as having a 'low' or 'negligible' likelihood of occurrence.

Emerge Associates (**Att G - REDACTED**) recorded 244 native and 17 non-native flora species during field surveys, including 16 priority flora species (see **Att K – Threatened and Priority Flora Species**). One unconfirmed individual, potentially *Thelymitra ?stellata*, was recorded as a sterile leaf.

The leaf was revisited on multiple occasions; however, the plant did not flower during spring 2025. Positive identification of *Thelymitra* species relies on floral characteristics, and leaf morphology alone is insufficient to distinguish taxa. The leaf observed was superficially similar to that of the more common *Thelymitra benthamiana* (leopard orchid) and therefore could represent either taxon.

Thelymitra stellata was assigned a high likelihood of occurrence due to the presence of suitable habitat within the survey area and the existence of confirmed records in the surrounding area (based on DBCA threatened species and communities' data searches). Targeted surveys were undertaken during the

species flowering period and under suitable seasonal conditions, confirming that survey timing was suitable. Known populations of *T.stellata* in Badgingarra National Park were also visited at the time of survey and were not recorded flowering, only the leaves were present. Consistent with this, the individual recorded within the site did not flower during the survey.

Threatened orchid guidance recognises that *Thelymitra* species may not flower annually and may persist as dormant tubers or sterile leaves, with flowering influenced by cumulative seasonal conditions rather than rainfall in a single year (DoE 2013). Rainfall data at the Badgingarra Research Station (BoM 2026) indicates variability between 2023–2025 with favourable conditions leading up to the 2025 spring period, suggesting flowering is not solely rainfall-dependent. Given nearby confirmed populations within Badgingarra National Park were present as sterile leaves during survey, survey timing was considered suitable to detect non-flowering individuals. As only one unconfirmed individual was recorded despite comprehensive survey effort, additional occurrences within the site are considered unlikely. Further targeted survey during the flowering period or genetic analysis would be required to confirm presence of *T. stellata*.

Fauna and black cockatoos

The *Basic Fauna and Targeted Black Cockatoo Assessment* (see **Att F**) conducted on 24 June 2025 and 15 September 2025, identified three broad fauna habitats as detailed in **Att L – Fauna Habitats**, and illustrated in **Att A - REDACTED, Figure 6**. This assessment also included a targeted black cockatoo assessment, with particular focus on habitat for *Zanda latirostris* (Carnaby's black cockatoo).

Desktop searches identified 27 threatened or priority fauna species as occurring or potentially occurring within 20 km of the project area.

Key MNES fauna

The distribution and habitat preferences of the 27 identified fauna species were reviewed in relation to the project area, classifying the likelihood of occurrence as 'high,' 'moderate,' 'low,' 'negligible,' or 'nil'.

A summary of conservation significant fauna potentially occurring within the project area is provided in **Att J, Table 2**. Based on the outcomes of the likelihood of occurrence assessment, one threatened and one specially protected MNES fauna species was classified as having a 'high' or 'moderate' likelihood of occurrence; the Carnaby's black cockatoo, and the Pacific swift. The remainder of the conservation significant fauna species identified in the desktop assessment were considered as having a 'low', negligible' or 'nil' likelihood of occurrence.

No occurrences of threatened or specially protected MNES fauna species were recorded within the site.

Black Cockatoos

The project area is within the Carnaby's black cockatoo modelled distribution range and many records of this species are known from the local area. Carnaby's black cockatoo wasn't recorded during the field survey, but they are likely to occur. Absence of direct observations of the species may be due to the timing of the survey during breeding season, during which individuals migrate to breeding sites, such as the Coomallo Nature Reserve approximately 20 km north-west of the site. The Proteaceae shrubland vegetation within the site comprises a range of suitable foraging plants.

The project area is located outside of the modelled distribution range of Baudin's black cockatoo and forest red-tailed black cockatoo and so these species are not considered likely to occur and have not been discussed further.

Breeding and roosting

Although within the breeding range of Carnaby's black cockatoos, the absence of suitable habitat trees suggests breeding would not occur within the project area for the foreseeable future.

The nearest documented roost is located 2.6 km north of the site and has consistently recorded white-tailed black cockatoos, between 2019 and 2024. Anecdotal evidence also indicates a roost within Badgingarra town (Yued Rangers, personal communication, 15 October 2025). Vegetation within the project area is too low in height and scattered to provide roosting habitat.

Foraging

The majority of the site supports a diverse range of proteaceous shrubs such as *Banksia* spp., *Grevillea* spp. and *Hakea* spp. which provide a native primary foraging resource for Carnaby's black cockatoo. Scattered *Eucalyptus todtiana* trees provide an additional native secondary foraging resource for the species. While the foraging habitat within the site is not insignificant, a 3.28 ha patch of foraging habitat is a relatively small resource compared to extensive areas of similar value foraging resource within the wider area, especially west of the Brand highway in Badgingarra National Park.

Likelihood of occurrence

The *Basic Fauna and Targeted Black Cockatoo Assessment* (**Att F**) found the key MNES that were identified as having a 'high' or 'moderate' likelihood to occur within the project area or recorded within the project area during surveys, include:

- One threatened fauna species *Zanda lateritic* (Carnaby's black cockatoo) (recorded during surveys)
- One migratory fauna species *Apus pacificus* (Pacific swift)

The Pacific swift is highly mobile and largely independent of terrestrial habitat. Any occurrence of pacific swift would be limited to use of the airspace above the project area, with no breeding or habitat reliance within the project area.

The project area provides a total of 3.28 ha of native primary foraging habitat for Carnaby's black cockatoo. The site also lies directly adjacent to the eastern border of Badgingarra National Park, where banksia-scrub and woodland habitats support a diverse fauna assemblage that could disperse into the site, which expands the varied fauna assemblage supported by the project area. Brand highway lies between the site and Badgingarra National Park, but it should not pose a barrier to the dispersal of most fauna species.

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

Soil

The project area occurs on the Geraldton Sandplains in the Lesueur Sandplain subregion, which is the geomorphic unit that characterises the region spanning from Dongara in the north, to Greenhead in the south and spanning inland to Badgingarra.

The Geraldton Sandplains comprises three subregions: Edel, Geraldton Hills and Lesueur Sandplains, which stretch from the south end of the Carnarvon basin to the northern areas of the Perth Basin and Pinjarra Orogen (CALM 2003). The region is characterised by an undulating lateritic sandplain mantling Permian to Cretaceous strata with areas of coastal aeolian sands and limestone. Alluvial outwash plains exist in areas of valleys and hills (Purdie *et al.* 2004).

Fine scale soil landscape mapping by DPIRD (2022) shows tow units as occurring within the project area (**Att A - REDACTED, Figure 5**). The project area is not known to contain any restricted landforms or unique geological features. The most abundant system covering the majority of the project area is the Yerramullah 2 Subsystem. This comprises plateau residuals, very gently to gently inclined hillcrest and hillslopes; pale sandy gravels, shallow gravel over duricrust, gravelly pale deep sand, pale and yellow deep sands. The system covering the eastern portion of the project area is Yerramullah 3 slopes phase, which comprises colluvial slopes; pale and yellow deep sands, pale sandy gravels, shallow gravel over duricrust, some sandy duplexes and sandy earths.

No ASS risk mapping exists for much of the Wheatbelt regions, including the site. Generally if ASS is present within the site, these would occur beneath the lowest seasonal groundwater levels, and risks only posed when activities are proposed to extent below the groundwater levels, through either deep excavation or dewatering.

No significant dewatering or excavation below groundwater is expected during construction associated with the proposed action, and therefore the potential risk of ASS disturbance is considered to be very low.

Vegetation

The project area is contained within the Geraldton Sandplains IBRA region and within the ‘GES02’ or Lesueur Sandplain subregion. The Geraldton Sandplains region (previously ‘Northern Sandplains’ region) is described as comprising mainly ‘scrub heath on sandplain near the coast, Acacia to Casuarina thickets further inland and Acacia scrub with scattered trees of *Eucalyptus loxophleba* on hard-setting loams’ (Beard 1990).

Variations in native vegetation can be further classified based on regional vegetation mapping. Beard *et al.* (2013) mapping shows the majority of the project area as comprising vegetation association ‘Le Sueur_1031’ which is described as ‘scrub-heath or heath’. A small portion in the north-eastern portion of the project area is mapped as comprising the ‘Le Sueur_1034’ vegetation association which is described as ‘woodland’ (Beard *et al.* 2013).

The ‘Le Sueur_1031’ association was determined to have 34.48% of its pre-European extent remaining in the Geraldton Sandplains region in 2017, with 14.72% protected for conservation purposes. The ‘Le Sueur_1034’ association was determined to have 61.90% of its pre-European extent remaining with 36.73% protected for conservation purposes (DBCA 2018).

Three (3) plant communities (vegetation units) were identified in the *Detailed Flora and Vegetation Assessment* by Emerge Associates (2026b) ranging from ‘excellent ’ to ‘completely degraded’ condition (refer **Att A - REDACTED, Figure 8** and **Figure 9**). The majority of the project area comprises of intact native vegetation in ‘excellent’ condition (3.24 ha, 83.16%). One small area (0.04 ha, 1.03%) was mapped as ‘very good’ condition due to evidence of disturbance associated with historical clearing under power lines. The remaining areas were mapped as ‘good’ (0.27 ha, 7.04%) or ‘completely degraded’ (0.34 ha,

8.77%) condition due to evidence of disturbance associated with historical clearing, which has resulted in altered vegetation structure, increased weed presence and reduced native species diversity. These areas represent firebreaks, Reimers Street, and access tracks.

Native vegetation occurs over 3.28 ha (84.19%) of the project area. The most common native plant community was **PsX** (2.07 ha, 53.02%), Shrubland of *Petrophile shuttleworthiana*, *Hibbertia hypericoides, Melaleuca tinkeri, Xanthorrhoea* spp., *Hakea* spp., and *Banksia* spp. over low sedgeland of *Mesomelaena pseudostygia, Morelotia octandra* and *Schoenus* spp. over forbland of *Alexgeorgea nitens, Blancoa canescens, Crassula closiana, Conostylis* spp. and *Levenhookia* spp. on low laterite rise.

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.

In order to determine the actual or potential presence of sites or features of non-indigenous heritage significance within the site, a review of the Australian Heritage Database (DCCEEW 2025), the State Heritage Office database (Heritage Council WA 2024) and the Local Heritage Survey (DPLH-008) was undertaken to determine if any of the following occur within the site:

- World Heritage Sites
- National Heritage Sites
- Commonwealth Heritage Places
- Sites listed in the State Register of Heritage Places.

The desktop search has indicated there are no state registered heritage sites located within the site.

Nearby sites were identified using the Local Heritage Survey (DPLH-008). Badgingarra Research Station (Herbert Sudholt's Farm) on Winjardie Road Badgingarra (Heritage Place No. 5828) is 5 km north northeast of the proposal area and Old Badgingarra Townsite (Heritage Place No. 5826) is 4 km east of the proposal area.

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

Noongar people are the Traditional Owners of the south-west of Western Australia, which incorporates the proposal area. The proposed action occurs across the South West Settlement Native Title, and within the Yued Region.

In Western Australia, Aboriginal cultural heritage is currently managed pursuant to the *Aboriginal Heritage Act 1972*, which provides a framework for the recognition, protection, preservation and management of Aboriginal heritage. The Act requires approval for activities that may impact or harm Aboriginal heritage. The DPLH maintain the Aboriginal Cultural Heritage Inquiry System (ACHIS), which is a directory containing locations and information about Aboriginal Cultural Heritage (ACH) in the state.

In accordance with the *Aboriginal Heritage Due Diligence Guidelines* (DAA 2013), a search of the ACHIS online database (DPLH 2025) was undertaken which did not identify any Registered Aboriginal Heritage Sites or Other Heritage Places within the site.

The closest Registered Aboriginal Cultural Heritage (ACH) Place in proximity to the project area is JB1 SITE (Place 17118), which is approximately 6.5 km to the north northwest, just north of the Cowalla Road and Brand Highway intersection. This ACH place is not culturally sensitive and is classified as a Camp.

In order to appropriately manage potential impacts on ACH and allow for meaningful engagement, the proponent has entered into a Yued Heritage Protection Agreement (YHPA). Ongoing consultation in accordance with the YHPA is being undertaken to ensure the proposed action is informed by and respectful of any relevant cultural heritage considerations.

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. *

Groundwater

A review of the Water Register (DWER 2025) indicates the project area falls within the Jurien Groundwater Area and the Badgingarra Groundwater Subarea. The site is underlain by a multilayer aquifer system comprised of the 'Perth – Superficial' aquifer and the 'Perth – Yarragadee North' aquifer. Yarragadee aquifer is a major freshwater resource in the Badgingarra Groundwater Subarea which is capable of supplying bore yields of >5000 kL/day.

The Jurien Groundwater Area is an area proclaimed for licensing under the *Rights in Water and Irrigation Act 1914*, which thereby requires that a 5C licence is obtained to abstract water for construction purposes. The 5C groundwater licence allows the licence holder to take a specified amount of water from the proclaimed area, water that may be transferred to another user, traded or leased, subject to approval. The 5C groundwater licence would be considered a temporary groundwater usage, which includes any activity with a set timeframe associated with the activity.

There are no groundwater bores or wells located within the project area, and no groundwater levels are available for the site.

Surface water

The project area is within the Hill River Catchment area. The Hill River, a major tributary, passes to the north, outside the project area boundary before continuing westward to the north of the project area. Multiple minor tributaries of the Hill River intersect the project area. The Hill River flows from Badgingarra westward for about 85 km to the Indian Ocean discharging south of Jurien Bay. The majority of the Hill River catchment area is used for agriculture, predominantly grazing and cropping.

The Hill River and tributaries catchment, as mapped by DWER, is gazetted as a Proclaimed surface water area allowing for the commercial use of water under a license as set out in the *Rights in Water and Irrigation (RIWI) Act 1914*. The RIWI Act's purpose is to regulate the taking of water from watercourses and wetlands.

Wetlands

Wetlands are areas of seasonally, intermittently or permanently waterlogged land such as poorly drained soils, ponds, billabongs, lakes, swamps, tidal flats, estuaries, rivers and their tributaries. Wetlands can be recognised by the presence of vegetation associated with waterlogging or the presence of hydric soils such as peat, peaty sand or carbonate mud (Hill *et al.* 1996).

Wetlands of national or international significance may be afforded special protection under Commonwealth or international agreements. Review of the *Ramsar List of Wetlands of International Importance* (DBCA 2017) and *A Directory of Important Wetlands in Australia – Western Australia* (DBCA 2018) indicates that no Ramsar or listed 'important wetlands' are located within or near the project area.

The Department of Water and Environmental Regulation (DWER) hydrography linear dataset (DWER 2018) indicate that no wetland or water related features exist within the project area.

The *Geomorphic Wetlands of Cervantes Eneabba (DBCA-015)* dataset (DBCA 2024) maps geomorphic wetland features and classifies them based on their landform shape and water permanence. Each wetland feature is classified according to their host landform and hydroperiod.

A review of the *Geomorphic Wetlands, Cervantes Eneabba* dataset indicated that no geomorphic wetlands occur in or within the immediate vicinity of the site (DBCA 2024).

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	Yes	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. *

There are no World Heritage sites listed within or in close proximity to the project area, and therefore this is not an applicable MNES.

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.

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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 listed within or in close proximity to the project area, and therefore this is not an applicable MNES.

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 project area does not directly intersect any RAMSAR wetlands, nor is it in close proximity or hydrologically upstream or up-gradient to any RAMSAR wetlands. On this basis this is not an applicable MNES.

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	Andersonia gracilis	Slender Andersonia
No	No	Aphelocephala leucopsis	Southern Whiteface
No	No	Banksia mimica	Summer Honeypot
No	No	Banksia serratuloides subsp. perissa	Northern Serrate Dryandra
No	No	Caleana dixonii	Sandplain Duck Orchid
No	No	Calidris acuminata	Sharp-tailed Sandpiper
No	No	Calidris ferruginea	Curlew Sandpiper
No	No	Dasyurus geoffroii	Chuditch, Western Quoll
No	No	Egernia stokesii badia	Western Spiny-tailed Skink, Baudin Island Spiny-tailed Skink
No	No	Eucalyptus absita	Badgingarra Box
No	No	Eucalyptus crispata	Yandanooka Mallee
No	No	Eucalyptus dolorosa	Dandaragan Mallee, Mount Misery Mallee
No	No	Eucalyptus leprophloia	Scaly Butt Mallee, Scaly-butt Mallee
No	No	Eucalyptus x balanites	Cadda Road Mallee, Cadda Mallee
No	No	Hakea megalosperma	Lesueur Hakea
No	No	Hemiandra gardneri	Red Snakebush
No	No	Leipoa ocellata	Malleefowl
No	No	Leucopogon obtectus	Hidden Beard-heath
No	No	Numenius madagascariensis	Eastern Curlew, Far Eastern Curlew
No	No	Parantechinus apicalis	Dibbler
No	No	Ptychosema pusillum	Dwarf Pea

Direct impact	Indirect impact	Species	Common name
No	No	Rostratula australis	Australian Painted Snipe
No	No	Thelymitra stellata	Star Sun-orchid
Yes	Yes	Zanda latirostris	Carnaby's Black Cockatoo, Short-billed Black-cockatoo

Ecological communities

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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. *

As part of the ecological assessments undertaken for the project area (**Att F** and **Att G - REDACTED**), a Likelihood of Occurrence assessment was completed for MNES listed threatened flora, fauna and ecological communities identified by the Protected Matters Search Tool (PMST) within and surrounding the project area. This assessment considered desktop database searches and the results of comprehensive field surveys and is provided in **Att J**. The likely direct and indirect impacts of the Proposed Action on relevant MNES are summarised below.

Flora and vegetation

The PMST identified two threatened ecological communities (TECs) as occurring or potentially occurring within 20 km of the project area (**Att J, Table 3**). All TECs identified through database searches were assessed as having a 'nil' likelihood of occurrence, with field surveys confirming that no TECs occur within the project area. Although the vegetation unit **EtB** identified within the project area has similarities to the Banksia woodlands of the Swan Coastal Plain TEC, this TEC is restricted to the Swan Coastal Plain bioregion. As the project area is located outside this bioregion, the vegetation present does not represent this TEC. Accordingly, the proposed action will not result in any direct or indirect impacts to listed ecological communities.

The PMST identified 34 threatened flora species as occurring or potentially occurring within 20 km of the project area (**Att J, Table 2)**. Of these, one species, *Thelymitra stellata* (Star Sun-orchid), was considered 'likely' to occur. This assessment was based on the presence of suitable habitat, nearby confirmed records, and the observation of a sterile leaf potentially representing the species.

One individual recorded as potentially *Thelymitra ?stellata* was observed as a sterile leaf only and could not be positively identified due to the absence of flowering material. As identification of *Thelymitra* species relies on floral characteristics, the occurrence remains unconfirmed. The leaf observed was superficially similar to that of the more common *Thelymitra benthamiana* (leopard orchid), meaning the individual could represent either taxon. Nevertheless, for the purposes of impact assessment under the EPBC Act, the proponent has adopted a precautionary approach by assuming the record could represent a potential occurrence of a listed threatened flora species.

In response, an avoidance area will be established to protect the potential *Thelymitra ?stellata* occurrence and a surrounding buffer of suitable habitat (refer **Att A, Figure 10**). **Att A, Figure 10** has been provided to DCCEEW for review and will not be made public as it contains the location of the potential *Thelymitra ? stellata* occurrence which is considered sensitive information. To the north, the potential *Thelymitra ?stellata* occurrence will be protected from both direct and indirect impacts through the establishment of a 15 m habitat buffer and the exclusion of development within the surrounding APZ, which provides an additional separation distance of approximately 15 m between the development and the avoidance area. The APZ will be landscaped with stone mulch and sparsely planted with native vegetation to maintain a reduced fuel load while minimising ecological disturbance. A 3 m wide access track will also be incorporated to provide safe access for emergency service vehicles during bushfire event. The proposed APZ treatment has been designed to minimise the risk of indirect impacts to the avoidance area, including erosion, sedimentation, soil compaction, changes to surface hydrology and weed incursion.

To the south of the *Thelymitra ?stellata* occurrence, the habitat buffer extends across a broader area, with no development proposed in this portion of the site. This ensures the avoidance area remains contiguous with adjacent native vegetation and prevents the creation of an isolated vegetation 'island' within the development footprint.

This design response avoids direct impacts to the potential occurrence and significantly reduces the risk of indirect impacts, including edge effects, altered surface hydrology, soil compact, weed incursion and unauthorised access.

Given the comprehensive survey effort undertaken across multiple visits during the peak flowering periods for species likely to occur and the known ecology of *T. stellata* as a species occurring at low densities in small, spatially isolated colonies (Hoffman and Brown 1998), there is a high level of confidence that this represents the only potential occurrence within the project area. No other threatened flora species were recorded within the project area by Emerge Associates (**Att G - REDACTED**), and the remaining threatened flora species identified by the PMST were assessed as 'unlikely' to occur and therefore unlikely to be impacted.

Fauna

The PMST search identified 10 threatened fauna species as occurring or potentially occurring within 20 km of the project area (**Att J – Table 2)**. Of these, only Carnaby's black cockatoo (Zanda latirostris) was assessed as 'likely' to occur. All other listed fauna species were assessed as 'unlikely' to occur based on habitat suitability and survey results.

Carnaby's black cockatoo

The Proposed Action will result in the permanent loss of approximately 2.89 ha of high-quality Carnaby's black cockatoo foraging habitat. This constitutes a direct impact through the loss of foraging resources. No breeding habitat or roosting habitat were identified within the project area. As such, the proposed action will not directly impact breeding or roosting resources, and impacts are limited to foraging habitat only.

Indirect impacts to Carnaby's black cockatoo may include temporary disturbance during construction activities, edge effects to habitat quality and short-term displacement from the immediate area.

Confirmed Carnaby's black cockatoo breeding sites exist to the north, east and south of the project area including breeding sites within the Coomallo Important Bird Area, which supports at least 1% of the breeding population (BirdLife International 2022; DPaW 2013). Each of these breeding sites is surrounded by a 12 km buffer zone (see **Att A - REDACTED, Figure 4**), which is expected to be the primary focus for foraging resources during the breeding season. The project area represents a small portion of the available foraging habitat within 12 km of breeding sites, as shown in **Att A - REDACTED, Figure 4**.

Roosting sites comprise stands of tall trees used by Carnaby's black cockatoos for overnight shelter, with site use influenced by the availability of local food resources, water, and broader flock movement patterns. Carnaby's black cockatoos generally forage within 6 km of a roost (DAWE 2022; Le Roux 2017). While no roosts have been identified within the project area, one known roost (DANBADR001) is located approximately 2.6 km north (DBCA 2024). More extensive and higher-quality foraging habitat is available closer to this roost compared to that within the project area, particularly within Badgingarra National Park.

Given the absence of breeding and roosting habitat within the project area, direct impacts will be limited to the clearing of a small area of foraging habitat. Any indirect impacts are expected to be localised and short-term in nature.

While the impacts described above are considered permanent due to the clearing of native vegetation and occupation of part of the project area for an anticipated 10-year operational period, the land use itself is temporary in nature. Upon cessation of operation, the accommodation facility is intended to be decommissioned and the land rehabilitated, with the objective of restoring native vegetation and reinstating the original environmental values and ecological function.

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

No

4.1.4.6 Describe why you do not consider this to be a Significant Impact. *

No listed TECs were recorded within or adjacent to the project area during the field surveys, and no impact to TECs are anticipated (refer **Att J – Table 3**).

The proposed action is not considered likely to result in a significant impact on MNES listed flora species. Comprehensive desktop and field investigations confirmed one threatened flora species, *Thelymitra stellata*, with potential to occur within the project area. A single, unconfirmed individual was recorded as a sterile leaf. Despite targeted surveys conducted across multiple visits during the peak flowering period, no additional individuals were detected.

Consistent with a precautionary approach, an avoidance area will be established to protect the potential *Thelymitra ?stellata* occurrence and a surrounding buffer of suitable habitat (refer **Att A, Figure 10**). **Att A, Figure 10** has been provided to DCCEEW for review and will not be made public as it contains the location of the potential *Thelymitra ?stellata* occurrence which is sensitive information. A 15 m habitat buffer will be applied to the north of the record, supplemented by an additional 15 m separation provided by the surrounding Asset Protection Zone (APZ), within which no development will occur. The APZ will be treated with stone mulch and sparsely planted with native vegetation to maintain a reduced fuel load. The stabilisation and suppression of weeds resulting from the proposed APZ treatment will also reduce potential edge effects on retained vegetation. No development is proposed to the south, ensuring the avoidance area remains contiguous with adjacent native vegetation and is note isolated within the development footprint (**Att A - REDACTED, Figure 3**).

The 15 m habitat buffer will prevent direct construction impacts, while the broader avoidance area and APZ provide further separation to minimise the risk of indirect impacts such as weed incursion, altered surface hydrology, soil compaction and sedimentation.

An adaptive management framework will be implemented, including monitoring of vegetation condition within the avoidance area and review of management measures as required. An additional targeted survey will be undertaken during the spring 2026 flowering period to confirm or discount the presence of *T. Stellata* and refine management if necessary.

Given the absence of confirmed threatened flora, together with the proposed avoidance, mitigation and adaptive management measures, the proposed action will not reduce population size, area of occupancy, fragment habitat, or interfere with the recovery of MNES listed flora. A significant impact is therefore not expected.

Carnaby's black cockatoo was the only MNES listed fauna species assessed as likely to occur and potentially impacted. The proposed action will clear approximately 2.89 ha of high-quality foraging habitat and retain 0.38 ha within an avoidance area. No breeding trees or roosting habitat occurs within the project area.

The *Referral Guideline for 3 WA Threatened Black Cockatoo Species* was used to assess the potential impact. Foraging habitat quality was assessed using the foraging habitat quality scoring tool defined in the guideline and achieved a score of 10 out of 10. Although the area to be cleared exceeds the 1 ha referral trigger, impacts have been assessed in the context of habitat availability and landscape setting. The habitat proposed to be cleared represents a small proportion of foraging resources available locally and regionally, including extensive high-quality habitat in nearby conservation areas such as Badgingarra National Park. No potential nesting trees will be cleared.

The impact on Carnaby's black cockatoo has been assessed against the *MNES Significant Impact Guidelines 1.1* as outlined below:

<u>1) Lead to a long-term decrease in the size of a population</u>

Unlikely to occur.

Carnaby's black cockatoos do not nest or roost within or near the project area. While foraging habitat may be used opportunistically, the project area lies only marginally within the 12 km foraging range of known breeding sites (refer **Att A - REDACTED, Figure 4**). Extensive higher-quality foraging habitat occurs in the surrounding landscape, including closer to breeding and roosting sites, which is more likely to support breeding and roosting individuals. As such, the foraging habitat within the project area is not expected to be relied upon to support breeding activity, and the proposed action is unlikely to result in a sustained reduction in birth rates.

The proposed action is unlikely to result in a sustained increase in mortality rates, either indirectly through a significant reduction of available foraging resources in the region, or directly through activities that could lead to bird deaths as a result of vehicle strikes or destruction of existing nests. Standard best-practice construction management measures will be implemented to minimise the risk of bird strikes during construction (e.g. pre-works fauna inspections, construction vehicle speed limits and directional clearing to encourage bird dispersal).

2) Reduce the area of occupancy of the species

Unlikely to occur.

The project area forms a small component of extensive surrounding habitat, when considered in a broader context due to its location adjacent to Badgingarra National Park. Clearing within the project area will not reduce the species occupancy at a local or regional scale.

3) Fragment an existing population into two or more populations

Unlikely to occur.

Carnaby's black cockatoo are highly mobile, travelling up to 12 km of nests for foraging. Approximately 15,930 ha of habitat occurs within 12 km of the project area. The small-scale clearing will not fragment populations.

4) Adversely affect habitat critical to the survival of a species

Unlikely to occur.

The *Carnaby's black cockatoo recovery plan* defines 'habitat critical to the survival' of the species as:

- The eucalypt woodlands that provide nest hollows used for breeding, together with nearby vegetation that provides feeding, roosting and watering habitat that supports successful breeding.
- Woodland sites known to have supported breeding in the past and which could be used in the future, provided adequate nearby food and/or water resources are available or are re-established.
- In the non-breeding season, the vegetation that provides food resources as well as the sites for nearby watering and night roosting enable Carnaby's black cockatoo to effectively utilised the available food sources.

The project area contains no nesting hollows, breeding habitat or known roost sites. While 3.28 ha of foraging habitat occurs, it is small relative to extensive surrounding habitat, including areas more closely associated with breeding and roosting sites. The site does not meet the definition of habitat critical to survival.

5) Disrupt the breeding cycle of a population

Unlikely to occur.

No breeding occurs within the project area and the habitat is not expected to be relied upon to support nearby breeding individuals.

6) Modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline

Unlikely to occur.

Approximately 0.38 ha of primary foraging habitat will be retained. Substantial foraging, breeding and roosting habitat will remain available locally and regionally. The scale of loss is not of a magnitude likely to cause species decline.

7) Result in invasive species that are harmful to a critically endangered or endangered or vulnerable species becoming established in the critically endangered or endangered or vulnerable species' habitat

Unlikely to occur.

The key consideration for this criterion would be the introduction of species that are known to compete with Carnaby's black cockatoo for nesting hollows or foraging resources. These species include the native and introduced corellas, galahs, Australian shelducks, Australian wood ducks and feral European honeybees. Carnaby's black cockatoo do not roost nor do they nest in the project area, so this is not a relevant consideration.

8) Introduce disease that may cause the species to decline

Unlikely to occur.

Carnaby's black cockatoo can be susceptible to diseases such as beak and feather disease virus, avian *polyomavirus* and *chlamydophilosis*. Insects, *Phytophthora cinnamomi* (dieback) and other soilborne, foliar and canker pathogens can also affect the health of their habitat.

The project area is located on the edge of Badgingarra township within a landscape long subject to agricultural and human disturbance. It is unlikely that the proposal would introduce avian disease or soil-borne pathogens beyond existing risk pathways. Standard construction hygiene measures will be implemented, including use of clean machinery, restricted clearing to approved areas and sourcing certified clean fill if required.

9) Interfere with the recovery of the species

Unlikely to occur.

The Carnaby's black cockatoo Recovery Plan recovery objective is "to stop further decline in the breeding populations of threatened black cockatoo species and to ensure their persistence throughout their current range in the south-west of Western Australia".

As discussed above, the proposed action will not interfere with or disrupt the breeding cycle of Carnaby's black cockatoo, nor will it result in a reduction in their current range. As such, the attainment of the recovery objective would not be compromised by the proposed action.

Although 2.89 ha of high-quality foraging habitat will be cleared, impacts are localised and minor when considered in the context of habitat availability, species ecology, and landscape connectivity. The absence of breeding and roosting habitat, retention of an avoidance area, and availability of substantial alternative foraging resources, particularly within adjacent Badgingarra National Park, further reduce impact.

Accordingly, the proposed action is not considered likely to result in a significant impact on Carnaby's black cockatoo or any other MNES.

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

No

4.1.4.9 Please elaborate why you do not think your proposed action is a controlled action. *

The proposed action is not considered a controlled action under the EPBC Act, as it is unlikely to result in a significant impact on any MNES. The only MNES listed threatened species and ecological communities assessed as likely to occur and potentially be impacted by the Proposed Action are Carnaby's black cockatoo (*Zanda latirostris*) and the Star Sun-orchid (*Thelymitra stellata*). Based on the nature, scale and duration of potential impacts, and with reference to the EPBC Act *Significant Impact Guidelines 1.1*, impacts to these species are not considered significant and therefore not a controlled action.

Star Sun-orchid (*Thelymitra stellata)*

The proposed action is not considered a controlled action in relation to *Thelymitra stellata* as it is unlikely to result in a significant impact on the species. A comprehensive detailed flora and vegetation assessment undertaken across multiple visits during the peak flowering period identified a single, unconfirmed individual, with no additional individuals detected despite targeted searches under suitable conditions (further discussed in **Att G - REDACTED, Section 5.1.2, pg. 21**).

The nature and scale of potential impact are negligible. No direct disturbance to the potential occurrence is proposed. Adopting a precautionary approach, an avoidance area will be established to protect the potential *Thelymitra ?stellata* occurrence and a surrounding buffer of suitable habitat (refer **Att A, Figure 10**). **Att A, Figure 10** has been provided to DCCEEW for review and will not be made public as it contains the location of the potential *Thelymitra ?stellata* occurrence which is considered sensitive information.

The *Thelymitra ?stellata* occurrence will be protected through the establishment of a 15 m habitat buffer to the north, supplemented by an additional 15 m separation provided by the surrounding Asset Protection Zone (APZ), within which no development will occur. The APZ will be treated with stone mulch and sparsely planted with native vegetation to maintain a reduced fuel load. The stabilisation and suppression of weeds resulting from the proposed APZ treatment will also reduce the potential for edge effects impacting retained vegetation within the avoidance area. To the south, no development is proposed, ensuring the avoidance area remains contiguous with adjacent native vegetation and preventing isolation within the development footprint (**Att A - REDACTED, Figure 3**).

The 15 m habitat buffer is intended to prevent direct impacts to the potential occurrence throughout construction, while the broader avoidance area and APZ provide additional separation to minimise the risk of indirect impacts. These measures reduce the potential for incidental disturbance and edge effects including weed incursion, altered surface hydrology, soil compaction and sedimentation. An ongoing adaptive management framework will also be implemented to ensure that mitigation measures remain effective and relevant over time and that any unforeseen impacts are addressed.

Given the absence of confirmed occurrences, the implementation of avoidance, minimisation measures, ongoing management, and the availability of extensive suitable habitat in the surrounding area, including the adjacent Badgingarra National Park, the Proposed Action will not reduce population size, fragment habitat, or interfere with the recovery of *Thelymitra stellata*. On this basis, the proposed action is not considered a controlled action in relation to this species.

Carnaby's black cockatoo (*Zanda latirostris*)

The proposed action is not considered a controlled action in relation to Carnaby's black cockatoo, as it is unlikely to result in a significant impact on the species. Approximately 3.28 ha of high quality foraging habitat for Carnaby's black cockatoo occurs in the project area (**Att F**), of which a portion will be disturbed by the proposed action (2.89 ha, 74.29%) (refer **Att A - REDACTED, Figure 7**). No breeding or roosting habitat occurs within the project area.

While clearing of 2.89 ha of high-quality foraging habitat is not insignificant, the scale of impact is small and localised when considered in a broader context. Extensive foraging habitat of a similar quality is available in the surrounding landscaping, including within nearby Badgingarra National Park, Coomallo Nature Reserve, Hill River Nature Reserve, Lesueur National Park and other reserves and landholdings in proximity to the project area. Approximately 6,530.9 ha of foraging habitat is available within 6 km of the project area, while

approximately 15,930.2 ha is available within 12 km of the project area. The proposed clearing within the project area represents 0.018% of foraging habitat available within 12 km of the project area and is therefore unlikely to represent a critical or preferential foraging resource in comparison to surrounding areas.

Carnaby's black cockatoos were not recorded during field surveys undertaken by Emerge Associates (**Att F**). However, the species are considered likely to occur occasionally and opportunistically. Absence of direct observations of the species may be due to the timing of the survey during breeding season, during which individuals migrate to breeding sites, such as the Coomallo Nature Reserve, approximately 20 km north-west of the project area. The nearest known breeding site is located approximately 11 km from the project area, and the nearest recorded roost (DANBADR001) is approximately 2.6 km north. More extensive and similar quality foraging habitat is available closer to these breeding and roosting sites, particularly within conservation reserves (refer **Att A - REDACTED, Figure 4**).

The Proposed Action will not reduce the area of occupancy of the species, fragment existing habitat, disrupt the breeding cycle, or adversely affect habitat critical to survival. The duration of impact is permanent in relation to foraging habitat loss, however, the limited extent of clearing and the availability of alternative foraging habitat mean the impact will not be significant.

With the implementation of standard construction management measures, the likelihood of indirect impacts (e.g. disease introduction, temporary disturbance during construction or edge effects) is low. On this basis, the proposed action is not considered likely to result in a significant impact on Carnaby's black cockatoo and is therefore not considered to be a controlled action.

In summary, the proposed action is unlikely to result in a significant impact on MNES Threatened Species and Ecological Communities. While impacts to *Thelymitra stellata* are avoided and mitigated, impacts to and Carnaby's black cockatoo are limited, small scale and localised, and do not meet the thresholds for a significant impact under the EPBC Act. As such, the proposed action is not considered a controlled 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. *

The proposed action has been designed to prioritise avoidance of MNES, with mitigation measures applied where impacts cannot be completely avoided. The design process has been informed by site specific ecological investigations (**Att F** and **Att G - REDACTED**).

Avoidance

Initially, the proponent's intention was to clear all vegetation within the project area to provide sufficient area for the required accommodation buildings, ancillary infrastructure, as well as achieving necessary separation in accordance with *Australian Standard 3959:2018 Construction of buildings in bushfire prone areas* (AS3959) and the Shire of Dandaragan's *Fire Break and Hazard Reduction Notice*. There are also constraints associated with topography within the project area meaning that significant earthworks and tiering is required to construct the accommodation facility. Given the space requirement, setbacks to comply with bushfire requirements, as well as the topography, it was initially deemed necessary to clear the entire site of vegetation.

However, the proponent has since developed an avoidance strategy to reduce impacts on MNES and prioritise avoidance, and with more detailed consideration of implications associated with addition earthworks and the required risk treatments through compliance with the policy measures described in the *Planning for Bushfire Guidelines - For the implementation of State Planning Policy 3.7 Bushfire* (the Guidelines).

The initial development concept and the revised development concept have been provided as **Att M.** A comparison of these designs shows how the layout has evolved in response to identified environmental values, with refinements made to avoid and minimise impacts where practicable.

The primary avoidance strategy for the proposed action is the avoidance of a potential occurrence of *Thelymitra stellata*, which also results in the retention of native vegetation that represents foraging habitat for Carnaby's black cockatoo (refer **Att A - REDACTED, Figure 7 and Figure 10**). **Att A, Figure 10** has been provided to DCCEEW for review and will not be made public as it contains the location of the potential *Thelymitra ?stellata* occurrence which is considered sensitive information.

The Badgingarra Workers Accommodation Village layout was refined specifically to consider the MNES values present within the project area. Accommodation buildings and ancillary infrastructure have been positioned outside of the avoidance area, as demonstrated in the development layout (**Att A - REDACTED, Figure 3**). This design avoids direct disturbance to the potential *Thelymitra stellata* occurrence and avoids the removal, loss or fragmentation of associated native vegetation that may be used by Carnaby's black cockatoo for foraging.

The avoidance area incorporates a 15 m habitat buffer to the north, and the exclusion of development within the surrounding APZ, which provides an additional separation distance of 15 m between the development and the avoidance area. The APZ will be treated with stone mulch and sparsely planted with native vegetation to maintain a reduced fuel load. The stabilisation and suppression of weeds resulting from the proposed APZ treatment will also reduce the potential for edge effects impacting retained vegetation within the avoidance area. To the south, no development is proposed, ensuring the avoidance area remains contiguous with adjacent native vegetation and preventing isolation within the development footprint (**Att A - REDACTED, Figure 2**).

This design response avoids direct impacts to the potential occurrence and significantly minimises the risk of indirect impacts, including edge effects, altered surface hydrology, soil compact, weed incursion and unauthorised access.

The avoidance area will result in the retention of 0.5 ha of native vegetation and represents a 25.72 % reduction in the area of clearing initially planned to be undertaken.

Mitigation measures

Where avoidance was not possible, impacts will be minimised through the implementation of standard, best practice construction and operational management measures.

Mitigation measures for flora and vegetation (and therefore Carnaby's black cockatoo foraging habitat) to be implemented during construction include, but are not limited to:

- Protection and ongoing management of the avoidance area.
- Establishment and maintenance of the APZ, including stabilisation of the proposed access track and surrounding areas using stone mulch to suppress weeds and minimise the risk of erosions and sedimentation.
- Installation and maintenance of erosion and sediment control measures where required, to prevent sedimentation impacts to the avoidance area.
- Implementation of a monitoring program to assess vegetation condition within the avoidance area, including indicators of edge effects, weed incursion and soil stability.
- Implementation of weed control and other remedial measures as required to maintain the quality of vegetation retained within the avoidance area.
- Additional targeted survey of the potential *Thelymitra ?stellata* occurrence during the spring 2026 flowering period to confirm or discount its presence and allow for the refinement of ongoing management.
- Preparation and implementation of a *Construction Environmental Management Plan* (CEMP) detailing construction phase mitigation measures.
- Clearly demarcating approved clearing boundaries prior to works commencing to minimise the risk of unauthorised clearing
- Establishing 'no-go' areas for vegetation to be retained within and adjacent to the project area (i.e. the avoidance area) using fencing and signage prior to the commencement of clearing. No access or storage of machinery or equipment will be permitted within these areas.
- Mandatory environmental inductions for all construction personnel, outlining MNES values, environmental constraints and compliance requirements.
- Implementation of hygiene protocols during the clearing and construction process to minimise introduction/spread of weeds and plant pathogens, including:
- Ensuring vehicles, machinery, and personnel are free of mud/soil and plant material upon entering the site. Inspections to be completed prior to works commencing.
- Avoiding clearing and earthworks during wet conditions where practicable.
- Use of landscaping species that are not identified as weeds.

An adaptive management framework will be applied, with monitoring outcomes reviewed regularly and management measures refined as necessary to respond to any observed changes in vegetation condition, emerging threats, or confirmation of the absence or presence of *Thelymitra stellata*. This approach ensures that mitigation measures remain effective and relevant over time and that any unforeseen impacts are addressed.

Impacts to native fauna are expected to be minor and short term, given the availability of extensive adjacent habitat, the limited scale of clearing, and the long-term retention of contiguous remnant vegetation within the avoidance area. To further minimise potential impacts to fauna during construction, the following mitigation measures will be implemented:

- Implementation of fauna management protocols by an experienced fauna specialist under a valid license from the Department of Biodiversity, Conservation and Attractions (DBCA).
- A pre-clearing fauna inspection to identify potential fauna interactions.
- Presence of a fauna spotter during clearing, with works directed to avoid fauna.
- Directional clearing toward retained vegetation to allow fauna to move safely to adjacent habitat.
- Trapping and translocation of small to medium sized (translocatable) native fauna where individuals are encountered and translocation is practical and appropriate.

- Maintaining a clean and tidy construction site, with waste appropriately managed and disposed of to prevent attraction of feral and native fauna species.

During operation of the accommodation facility, permanent fencing and signage will be installed to clearly demarcate the avoidance area and prevent unauthorised access by both accommodation users and staff. Ongoing operational mitigation measures will include maintaining habitat buffers, controlling access, implementing weed management as required, and monitoring the condition of retained vegetation to minimise the risk of indirect impacts over the life of the proposed action.

Through the avoidance of MNES values, minimisation of clearing, and the implementation of construction and operational mitigation measures, the proposed action has been designed to avoid or reduce impacts to MNES as far as reasonably practicable. With these measures in place, any residual impacts are expected to be minor, localised, short term during construction and not significant in accordance with the EPBC Act *Significant Impact Guidelines 1.1.*

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

No significant residual impacts to MNES are anticipated as a result of the proposed action. As described above, impacts to Carnaby's black cockatoo and *Thelymitra stellata* have been avoided or reduced to a level that is not considered significant in accordance with the *Significant Impact Guidelines 1.1*. On this basis, no offsets are considered necessary.

However, recognising the time-sensitive nature of the proposed action and the consequential implications for the timely delivery of the Parron Wind Farm, a contingency offset proposal has been prepared and is provided as **Att N – Offset Proposal**. This offset proposal has been developed in accordance with the EPBC Act Environmental Offsets Policy and is submitted on a precautionary basis only, in the event that the action is determined to be a controlled action and further assessment is required. It is anticipated that providing this information will assist the Department in its assessment and facilitate timely decision-making and further assessment if necessary.

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	Yes	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
No	No	Numenius madagascariensis	Eastern Curlew, Far Eastern Curlew
No	No	Pandion haliaetus	Osprey

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

Yes

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

As part of the ecological assessments undertaken for the project area (**Att F** and **Att G - REDACTED**), a Likelihood of Occurrence assessment was completed for MNES listed migratory species identified by the Protected Matters Search Tool (PMST) within and surrounding the project area. This assessment considered desktop database searches and the results of comprehensive field surveys and is provided in **Att J, Table 2**.

The PMST identified eight migratory species as occurring or potentially occurring within 20 km of the project area (**Att J – Table 2**). Of these, only one species, the Pacific swift (*Apus pacificus),* was assessed as having a 'possible' likelihood of occurrence.

There are no recent or reliable records of the Pacific swift within or near the project area from previous surveys or available database and literature sources (ALA 2025 and **Att F**). While the PMST indicates that the species or its habitat may occur within the broader search area, no records exist within 20 km of the project area in either *Atlas of Living Australia* (ALA 2025) and Birdata (Birdlife Australia 2024a). This aligns with the species known ecology within Australia, where it occurs sparsely across a very broad range and is typically recorded only during brief, opportunistic encounters (DCCEEW 2023; Marchant and Higgins 1990).

Given the Pacific swift's wide distribution and migratory behaviour, it is considered possible that individuals may pass through the airspace above the project area at some time during construction or operation of the Proposed Action. However, any occurrence would be temporary, infrequent, and likely limited to the period between October and April.

Direct impacts to Pacific swift

Pacific swift are typically sighted in singletons or flocks of three (Marchant and Higgins 1990). There is no population estimate for the species, however flocks of up to 90,000 individuals have been recorded in Australia. Therefore, global populations are likely to be much higher than this figure. Additionally, they have a wide distribution across several continents, nowhere in which they are threatened (DCCEEW 2023). Impacts to singletons or small groups is likely to have no effect on the population.

The species would not breed within the project area, and any use of the site would be confined to airspace, independent of terrestrial habitat. Accordingly, no direct impacts to Pacific swift are anticipated as a result of the proposed action.

Indirect impacts to Pacific swift

The Pacific swift lacks specific habitat requirements and mostly forages in a wide distribution across a broad range of habitats. The project area does not contain unique or locally significant habitat attributes that would attract the species, nor does it differ from the surrounding region in terms of foraging value.

Given the species broad habitat preferences, widespread distribution and reliance on aerial foraging, the removal of 2.89 ha of native vegetation within the project area is not expected to affect the species' distribution, abundance or density. Any occurrence within the project area would be incidental and unlikely to be influenced by changes to terrestrial vegetation as a result of development. As such, the risk of indirect impacts to the Pacific swift as a result of the proposed action are considered to be low.

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

No

4.1.5.6 Describe why you do not consider this to be a Significant Impact. *

The Proposed Action is not considered likely to result in a significant impact on the Pacific swift. The species is a highly mobile, migratory, aerial insectivore with no reliance on terrestrial habitat for breeding, roosting or foraging. Comprehensive ecological surveys undertaken for the project area, including a likelihood of occurrence assessment, indicate no recent or reliable records of the species exist within 20 km of the project area (refer **Attach F, Section 4 and 5, pg. 14 - 18** and **Att J, Table 2**). Additionally, no individuals or habitat features that would attract or support the species was recorded during field surveys (**Att F**).

While the species may occasionally pass through the airspace above the project area, any interaction would be infrequent, short-term and independent of ground-level disturbance. The nature of any potential direct or indirect impact is therefore negligible. As such, the proposed action is not likely to result in a significant impact on the Pacific swift.

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

No

4.1.5.9 Please elaborate why you do not think your proposed action is a controlled action. *

The proposed action is not considered to be a controlled action as there are no significant direct or indirect impacts foreseen for Migratory Species.

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

No species-specific avoidance or mitigation measures are proposed for the Pacific swift, as the species has not been recorded within or nearby the project area in previous assessment and the proposed action is not anticipated to result in significant direct or indirect impacts to the species.

The project area does not contain habitat required for breeding or foraging, and any occurrence would be transient and limited to the use of the airspace above the project area, independent of terrestrial habitat and any ground level disturbance.

The proposed action's avoidance strategy is focussed on minimising vegetation clearing associated with Carnaby's black cockatoo foraging habitat and the unconfirmed *Thelymitra ?stellata* occurrence. These measures would not alter prey availability or airspace use for the Pacific swift.

Standard construction management measures, including noise and dust controls, will be implemented as part of the *Construction Environmental Management Plan* and are considered sufficient to manage any unlikely, incidental interactions with this highly mobile, wide-ranging migratory species.

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

There are no significant residual impacts and therefore there is no need for offsets and no offsets have been proposed.

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. *

There are no nuclear actions associated with the Proposed Action and therefore this is not an applicable MNES.

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. *

The Proposed Action is not within or in proximity to a Commonwealth Marine Area and therefore this is not an applicable MNES.

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 Proposed Action is not within or in proximity to the Great Barrier Reef and therefore this is not an applicable MNES.

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 does not include any coal seam gas or large coal mine related development and therefore this is not an applicable MNES.

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. *

The Proposed Action is not being taken on Commonwealth land, nor is it expected to impact upon Commonwealth land and therefore this is not an applicable MNES.

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. *

There are no overseas Commonwealth heritage places that are relevant or in proximity to the Proposed Action and therefore this is not an applicable MNES.

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:

None

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)
- Threatened Species and Ecological Communities (S18)
- 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. *

Alternative locations were considered within proximity to the Parron Wind Farm, the Badgingarra townsite, and land proposed for inclusion within the Noongar Land Estate. The project area has been approved for transfer to the Noongar Boodja Trust and is intended to be managed for the benefit of the Yued People. Locating the accommodation facility on this land enables direct economic participation, asset ownership, and long-term benefits for the Yued People, which would not be achieved at alternative sites outside the Noongar Land Estate.

Most suitably located land parcels near the wind farm and Badgingarra townsite, including those within the Noongar Land Estate, are predominantly vegetated and would require a similar extent of native vegetation clearing to accommodate the accommodation facility. As such, alternative sites would not result in a reduced environmental impact.

Locating the facility within Badgingarra enables use of existing infrastructure and provides social and economic benefits through engagement with local businesses, services and the community.

The Parron Wind Farm site itself was also considered as an alternative location. However, locating the accommodation facility within the wind farm would impact productive agricultural land and would not deliver the same economic benefits to the Yued People or the local community.

No alternative site was identified that would reduce environmental impacts while maintaining proximity to the wind farm, supporting Noongar Land Estate objectives, and delivering comparable community benefits. Accordingly, no feasible alternatives were identified.

5. Lodgement

5.1 Attachments

1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att A - Figures.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values. Figure 10 contains the location of a potential threatened flora species.	25/02/2026	Yes	High
#2.	Document	Att A - REDACTED.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values (redacted version).	25/02/2026	No	High
#3.	Document	Att C - Letter of Support (Yued).pdf Letter outlining the results of an ethnographic and archaeological heritage survey completed for the project area in support of the development. This document contained names and signatures.	17/09/2025	Yes	High
#4.	Document	Att C - REDACTED.pdf Letter outlining the results of an ethnographic and archaeological heritage survey completed for the project area in support of the development (redacted version).	17/09/2025	No	High
#5.	Document	Att D - Landowner Consent Letter (DPLH).pdf Landowner consent letter provided by DPLH for the proposed development. This document contains names, signatures and contact details.	12/11/2025	Yes	High
#6.	Document	Att D - REDACTED.pdf Landowner consent letter provided by DPLH for the proposed development (redacted version).	12/11/2025	No	High

1.2.7 Public consultation regarding the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att E - REDACTED.pdf Record of stakeholder engagement (redacted version)	26/02/2026	No	High
#2.	Document	Att E - Stakeholder Consultation.pdf Details of stakeholders consulted on the proposed development. Attachment E	05/03/2026	Yes	High

contains names of community members.

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 - Atmos Renewables Environmental Policy.pdf Atmos Renewables environmental policy	01/10/2024	No	High

3.1.1 Current condition of the project area's environment

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att A - Figures.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values. Figure 10 contains the location of a potential threatened flora species.	24/02/2026	Yes	High
#2.	Document	Att A - REDACTED.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values (redacted version).	24/02/2026	No	High
#3.	Document	Att C - Letter of Support (Yued).pdf Letter outlining the results of an ethnographic and archaeological heritage survey completed for the project area in support of the development. This document contained names and signatures.	16/09/2025	Yes	High
#4.	Document	Att C - REDACTED.pdf Letter outlining the results of an ethnographic and archaeological heritage survey completed for the project area in support of the development (redacted version).	16/09/2025	No	High
#5.	Document	Att D - Landowner Consent Letter (DPLH).pdf Landowner consent letter provided by DPLH for the proposed development. This document contains names, signatures and contact details.	11/11/2025	Yes	High
#6.	Document	Att D - REDACTED.pdf Landowner consent letter provided by	11/11/2025	No	High

		DPLH for the proposed development (redacted version).			
#7.	Document	Att G - Detailed Flora and Vegetation Assessment.pdf Detailed Flora and Vegetation Assessment completed for the project area. Report figures show the location of a potential threatened species.	02/03/2026	Yes	High
#8.	Document	Att G - REDACTED.pdf Detailed Flora and Vegetation Assessment completed for the project area (redacted version).	02/03/2026	No	High
#9.	Document	Att K - Priority flora species recorded within the site.pdf Priority flora species recorded within the site	05/03/2026	No	Medium
#10.	Link	Technical Guidance: Flora and Vegetation Surveys for Environmental Impact Assessment https://www.epa.wa.gov.au/sites/default/files/Po..	01/12/2016		High

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

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att A - Figures.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values. Figure 10 contains the location of a potential threatened flora species.	24/02/2026	Yes	High
#2.	Document	Att A - REDACTED.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values (redacted version).	24/02/2026	No	High
#3.	Link	Soil Landscape Mapping - Best Available (DPIRD-027) https://www.epa.wa.gov.au/sites/default/files/Po..			High

3.1.4 Gradient relevant to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att A - Figures.pdf Figures showing the project area, disturbance footprint, proposed	24/02/2026	Yes	High

		avoidance and environmental values. Figure 10 contains the location of a potential threatened flora species.			
#2.	Document	Att A - REDACTED.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values (redacted version).	24/02/2026	No	High

3.2.1 Flora and fauna within the affected area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att F - Basic Fauna and Targeted BC Assessment.pdf Basic Fauna and Targeted Black Cockatoo Assessment completed within the project area	30/01/2026	No	High
#2.	Document	Att G - Detailed Flora and Vegetation Assessment.pdf Detailed Flora and Vegetation Assessment completed for the project area. Report figures show the location of a potential threatened species.	03/03/2026	Yes	High
#3.	Document	Att G - REDACTED.pdf Detailed Flora and Vegetation Assessment completed for the project area (redacted version).	01/03/2026	No	High
#4.	Document	Att H - Plant Communities within the Project Area.pdf Details of plant communities within the project area	05/03/2026	No	High
#5.	Document	Att I - Vegetation Condition Categories Within the Project Area.pdf Details of vegetation condition within the project area	05/03/2026	No	High
#6.	Document	Att J - Likelihood of Occurrence.pdf Likelihood of occurrence assessment completed for the project area.	08/01/2026	No	High
#7.	Document	Att K - Priority flora species recorded within the site.pdf Summary of priority and threatened flora species recorded within the project area	05/03/2026	No	High
#8.	Document	Att L - Fauna habitats within the Project Area.pdf Summary of fauna habitats recorded within the project area.	05/03/2026	No	High

#9.	Link	Climate Data Online https://www.bom.gov.au/climate/data/	High
#10.	Link	SURVEY GUIDELINES FOR AUSTRALIA'S THREATENED ORCHIDS GUIDELINES FOR DETECTING ORCHIDS LISTED AS 'TH https://www.dcceew.gov.au/sites/default/files/do..	Medium

3.2.2 Vegetation within the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att A - Figures.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values. Figure 10 contains the location of a potential threatened flora species.	24/02/2026	Yes	High
#2.	Document	Att A - REDACTED.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values (redacted version).	24/02/2026	No	High
#3.	Link	A Biodiversity Audit of Western Australias 53 Biogeographical Subregions in 2002 https://library.dbca.wa.gov.au/FullTextFiles/021..			Medium
#4.	Link	DBCA Statewide Vegetation Statistics https://catalogue.data.wa.gov.au/dataset/dbca-st..			Medium
#5.	Link	The vegetation of Western Australia at the 1:3,000,000 scale. Explanatory memoir. Second edition https://library.dbca.wa.gov.au/Journals/080525/0..	01/01/2013		High

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

	Type	Name	Date	Sensitivity	Confidence

#1.	Link	Australian Heritage Database https://www.environment.gov.au/cgi-bin/ahdb/sear..	High
#2.	Link	State Heritage Office database https://inherit.dplh.wa.gov.au/Public/	High

3.3.2 Indigenous heritage values that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Aboriginal Cultural Heritage Inquiry System https://espatial.dplh.wa.gov.au/ACHIS/index.html..			High
#2.	Link	Aboriginal Heritage Due Diligence Guidelines https://www.infrastructure.gov.au/sites/default/..			High

3.4.1 Hydrology characteristics that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Directory of Important Wetlands in Australia - Western Australia (DBCA-045) https://catalogue.data.wa.gov.au/dataset/directo..			High
#2.	Link	Geomorphic Wetlands Cervantes Eneabba (DBCA-015) https://catalogue.data.wa.gov.au/dataset/geomorp..			High
#3.	Link	Hydrography, Linear (Hierarchy) (DWER-031) https://catalogue.data.wa.gov.au/dataset/hydrogr..			High
#4.	Link	Ramsar Sites (DBCA-010) https://catalogue.data.wa.gov.au/dataset/ramsar-..			High
#5.	Link	Water Register https://maps.water.wa.gov.au/#/webmap/register			High
#6.	Link	Wetlands of the Swan Coastal Plain: Volume 2A - Wetland Mapping, Classification and			Medium

Evaluation

https://library.dbca.wa.gov.au/FullTextFiles/001..

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 - Figures.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values. Figure 10 contains the location of a potential threatened flora species.	24/02/2026	Yes	High
#2.	Document	Att A - REDACTED.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values (redacted version).	24/02/2026	No	High
#3.	Document	Att F - Basic Fauna and Targeted BC Assessment.pdf Basic Fauna and Targeted Black Cockatoo Assessment completed within the project area	29/01/2026	No	High
#4.	Document	Att G - Detailed Flora and Vegetation Assessment.pdf Detailed Flora and Vegetation Assessment completed for the project area. Report figures show the location of a potential threatened species.	02/03/2026	Yes	High
#5.	Document	Att G - REDACTED.pdf Detailed Flora and Vegetation Assessment completed for the project area (redacted version).	01/03/2026	No	High
#6.	Document	Att J - Likelihood of Occurrence.pdf Likelihood of occurrence assessment completed for the project area.	07/01/2026	No	High
#7.	Link	Black Cockatoo Roosting Sites - Buffered (DBCA-064) https://catalogue.data.wa.gov.au/dataset/black-c..			High
#8.	Link	Carnaby's Cockatoo (Calyptorhynchus latirostris) Recovery Plan https://www.dcceew.gov.au/sites/default/files/do..	01/10/2013		High

#9.	Link	Important Bird Areas http://datazone.birdlife.org/site/factsheet/nort..	High
#10.	Link	Nocturnal roost tree, roost site and landscape characteristics of Carnabys Black-Cockatoo https://ro.ecu.edu.au/theses/2017/	High
#11.	Link	Referral guideline for 3 WA threatened black cockatoo species https://www.dcceew.gov.au/sites/default/files/do..	High

4.1.4.6 (Threatened Species and Ecological Communities) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att A - Figures.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values. Figure 10 contains the location of a potential threatened flora species.	24/02/2026	Yes	High
#2.	Document	Att A - REDACTED.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values (redacted version).	24/02/2026	No	High
#3.	Document	Att J - Likelihood of Occurrence.pdf Likelihood of occurrence assessment completed for the project area.	07/01/2026	No	High

4.1.4.9 (Threatened Species and Ecological Communities) Why you do not think your proposed action is a controlled action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att A - Figures.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values. Figure 10 contains the location of a potential threatened flora species.	24/02/2026	Yes	High
#2.	Document	Att A - REDACTED.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values (redacted version).	24/02/2026	No	High
#3.	Document				

Att F - Basic Fauna and Targeted BC Assessment.pdf Basic Fauna and Targeted Black Cockatoo Assessment completed within the project area			29/01/2026	No	High
#4.	Document	Att G - Detailed Flora and Vegetation Assessment.pdf Detailed Flora and Vegetation Assessment completed for the project area. Report figures show the location of a potential threatened species.	02/03/2026	Yes	High
#5.	Document	Att G - REDACTED.pdf Detailed Flora and Vegetation Assessment completed for the project area (redacted version).	01/03/2026	No	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 A - Figures.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values. Figure 10 contains the location of a potential threatened flora species.	24/02/2026	Yes	High
#2.	Document	Att A - REDACTED.pdf Figures showing the project area, disturbance footprint, proposed avoidance and environmental values (redacted version).	24/02/2026	No	High
#3.	Document	Att F - Basic Fauna and Targeted BC Assessment.pdf Basic Fauna and Targeted Black Cockatoo Assessment completed within the project area	29/01/2026	No	High
#4.	Document	Att G - Detailed Flora and Vegetation Assessment.pdf Detailed Flora and Vegetation Assessment completed for the project area. Report figures show the location of a potential threatened species.	02/03/2026	Yes	High
#5.	Document	Att G - REDACTED.pdf Detailed Flora and Vegetation Assessment completed for the project area (redacted version).	01/03/2026	No	High
#6.	Document	Att M - Development Concepts.pdf Initial development concept and	04/02/2026	No	High

updated development concept, revised to respond to environmental values identified within the site.

4.1.4.11 (Threatened Species and Ecological Communities) Proposed offsets relevant to avoidance or mitigation measures

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att N - Offset Proposal.pdf Offset proposal provided in the event that the action is determined to be a controlled action and further assessment is required.	25/02/2026	No	High

4.1.5.2 (Migratory Species) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att F - Basic Fauna and Targeted BC Assessment.pdf Basic Fauna and Targeted Black Cockatoo Assessment completed within the project area	29/01/2026	No	High
#2.	Document	Att G - Detailed Flora and Vegetation Assessment.pdf Detailed Flora and Vegetation Assessment completed for the project area. Report figures show the location of a potential threatened species.	02/03/2026	Yes	High
#3.	Document	Att G - REDACTED.pdf Detailed Flora and Vegetation Assessment completed for the project area (redacted version).	01/03/2026	No	High
#4.	Document	Att J - Likelihood of Occurrence.pdf Likelihood of occurrence assessment completed for the project area.	07/01/2026	No	High
#5.	Link	Birdata https://birdata.birdlife.org.au/explore#map=-22...			High
#6.	Link	Handbook of Australian, New Zealand and Antarctic Birds. Volume One - Ratites to Ducks https://hanzab.birdlife.org.au/hanzab/hanzab-vol..			High
#7.	Link	Spatial Portal https://spatial.ala.org.au/			High

#8.	Link	Species Profile and Threats Database: Apus pacificus - Fork-tailed swift https://Species Profile and Threats Database: Ap..		High

4.1.5.6 (Migratory Species) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Att F - Basic Fauna and Targeted BC Assessment.pdf Basic Fauna and Targeted Black Cockatoo Assessment completed within the project area	29/01/2026	No	High
#2.	Document	Att J - Likelihood of Occurrence.pdf Likelihood of occurrence assessment completed for the project area.	07/01/2026	No	High

5.2 Declarations

Completed Referring party's declaration

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

ABN/ACN	57144772510
Organisation name	Emerge Environmental Services Pty Ltd
Organisation address	26 Railway Road, Subiaco, 6008
Representative's name	Jason Hick
Representative's job title	Director, Principal Environmental Consultant
Phone	08 9380 4988
Email	jason.hick@emergeassociates.com.au
Address	Suite 4, 26 Railway Road, Subiaco WA 6008

☑ 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, **Jason Hick of Emerge Environmental Services 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	29618978082
Organisation name	ZEPHYR ENERGY PTY LTD
Organisation address	Level 9, 123 Pitt Street, Sydney NSW 2000
Representative's name	Tim Stevenson

Representative's job title	Director
Phone	0427008096
Email	tim@parron.com.au
Address	Level 9, 123 Pitt Street, Sydney NSW 2000

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

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

☑ I, **Tim Stevenson of ZEPHYR ENERGY 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, **Tim Stevenson of ZEPHYR ENERGY 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.