

20th August 2025

MG Pastoral Pty Ltd
Level 1, 863 High Street
Armadale Victoria 3143

Attention: Marshall Dennis

By Email – Marshall.dennis@ranfurleam.com.au

Dear Marshal,

RE: ROKEWOOD OFFSET SITE
Spiny Rice Flower Targeted Survey
PROJECT NUMBER 22192.03

DFC Pty Ltd engaged Nature Advisory Pty Ltd to undertake targeted Spiny Rice-flower (SRF) flora surveys of a 78.61 ha offset site in Rokewood. The property subject to this investigation comprised two areas within the property at 1541 Rokewood-Shelford Road, Rokewood (SPI: 46A\PP3485 & 46B\PP3485) (referred to herein as the 'study area', Figure 1). This assessment was undertaken to satisfy EPBC compliance requirements and approval conditions (EPBC 2011/6004) 2 and 3, specifically points relating to SRF surveys; relevant approval conditions are provided below:

EPBC Act Approval Condition 2

The approval holder must meet the following outcomes at the offset site by 10 years following the date of approval:

- There must be at least 22.23 ha of Natural Temperate Grassland of the Victorian Volcanic Plain with a quality score of at least 8;
- There must be at least 22.1 ha of Striped Legless Lizard habitat with a quality score of at least 7; and
- There must be at least 660 Spiny Rice Flower individuals.

EPBC Act Approval Condition 3

At 4 and 7 years from the date of the approval, the approval holder must ensure surveys for Natural Temperate Grassland of the Victorian Volcanic Plain, Spiny Rice Flower and Striped Legless Lizard are conducted by a suitably qualified expert(s) to provide adaptive management recommendations that must be implemented to achieve the outcomes in condition 2.

In accordance with EPBC Act Approval Condition 3, year 4 surveys are required for the following EPBC Act-listed matters at the Rokewood offset site:

- Natural Temperate Grassland of the Victorian Volcanic (NTGVVP);
- Spiny Rice-flower (SRF); and

- Striped Legless Lizard (SLL). The outcome of these site surveys will then inform adaptive management recommendations to be implemented, where required, to meet EPBC Act Approval Condition outcomes at Year 10 (2026) from the date of approval.

The scope of work included the following:

- SRF surveys were conducted timed to coincide with the flowering season of SRF (June-August).
- Transects were undertaken at 5 metre intervals in areas of suitable habitat for detection of the species.
- Any identified SRF were recorded using a hand-held GPS.
- Areas of suitable habitat where transects are conducted were mapped and described.
- Suitable habitat was assessed during the field survey as well as informed by previous survey data.

This investigation was undertaken by a team from Nature Advisory comprising Neassa Fritchley (Botanist), Cody Hajnal (Botanist), and Suzie Moss (Botanist & Project Manager).

Methodology

Suitable Habitat

Targeted surveys of Spiny Rice-flower were conducted in areas already supporting Spiny Rice-flower and in areas of suitable habitat. For this investigation, suitable habitat included areas of previously mapped grassland (BL&A 2015) that met the condition thresholds to be classified as Natural Temperate Grassland of the Victorian Volcanic Plain (NTGVVP).

Some areas had been previously mapped to contain “partial NTGVVP”; these areas were not surveyed using the methods below, as they did not contain suitable habitat for Spiny Rice-flower.

Survey method

The survey methods used for this investigation were in accordance with the methods outlined in the *Significant Impact Guidelines for the critically endangered Spiny Rice-flower Pimelea spinescens subsp. spinescens* (DEWHA 2009), on 12 to 14 August 2025. These methods included:

- Parallel transects were traversed, spaced 5 m apart, while visually inspecting the surrounding area. Transects were tracked using ArcGIS Field Maps® (ESRI), shown on Figure 1.
- The locations of any Spiny Rice-flower individuals found during the survey were recorded using a hand-held GPS to an accuracy of 1–3 m. Individuals with an associated tag were named accordingly; individuals without a tag received a new number.

Existing Information

The initial survey of this offset site was conducted by Nature Advisory (previously Brett Lane & Associates) (BL&A 2015), followed up by EPBC compliance monitoring in 2020 (Nature Advisory 2020).

The initial population of Spiny Rice-flower contained **550 individuals**, most of which were tagged. The population was largely confined to the northeast portion of the study area, with scattered individuals along the northern boundary and to the south of the study area.

Figure 1A: Targeted survey for Spiny Rice-flower

Project No: 22192.02

Project: Rokewood Offset Site, VIC


Date: 19/08/2025

 Study area

 Property boundary

Native vegetation

 NTGVVP

 NTGVVP - Partial Extent

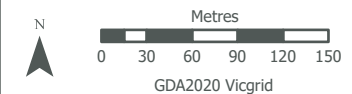
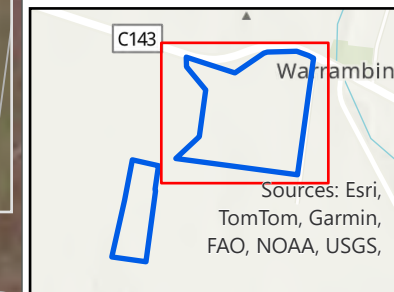
Spiny Rice-flower survey

 Spiny Rice-flower

 Survey effort

Rokewood - Shelford Road

Source: Esri, Maxar, Earthstar
Geographics, and the GIS
User Community



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Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

Figure 1B: Targeted survey for Spiny Rice-flower

Project No: 22192.02

Project: Rokewood Offset Site, VIC

Date: 19/08/2025

 Study area

 Property boundary

Native vegetation

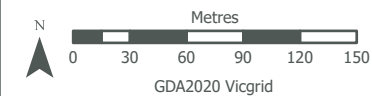
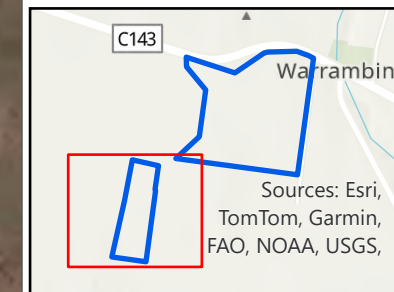
 NTGVVP

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Survey Results & Recommendations

During this survey, 496 Spiny Rice-flower were recorded. Most individuals found in this survey were limited to the reserve in the northeast (Figure 1a). As mentioned above, scattered individuals of Spiny Rice-flower were located outside the reserve in 2014; however, this survey only found one isolated Spiny Rice-flower outside the reserve (Figure 1b).

Previous surveys and number of individuals identified are as follows:

- 2014 – 550 (Report 14094.5)
- 2020 – 350 (Report 14094.10)
- 2025 – 496 (Current)

This corresponded to an increase from the previous survey (2020) but still shows a small overall decline from 2014.

It should be noted that these fluctuations cannot be pinned to one cause and effect and could be the result of a mixture of the following reasons:

- Fluctuations of biomass impacting detectability
- Seasonal challenges for SRF longevity and recruitment (e.g. unusually warm winters and summers)
- Lack of low intensity burning
- Open grazing in the wider offset area (excluded from the large SRF population) meant individuals can be eaten by sheep or other farm animals
- Weed encroachment

Although the trajectory of the SRF population cannot be reliably determined, as it has shown both decreases and increases in previous years, it is considered unlikely to increase without active management; the population has had a relatively small overall but disproportionate loss in individuals, compared to the evidence of recruits overall, however, it seems to have increased substantially since the 2020 survey. This may have been due to poor detectability during the 2020 survey or a combination of successful management and favourable conditions in the following period. The population appears to be increasing, however it is clear from previous survey results that this can fluctuate drastically between surveys.

Therefore, it is considered ongoing management and monitoring is required to meet the approval condition requirement of increasing the SRF population to 660 SRF plants by the end of year 10, or 2026, from the approved date. Management to achieve this is recommended as follows:

- Weed Control - Ongoing weed control as outlined in the approved OMP is recommended to continue.
- Biomass Control - Low intensity mosaic burning within the fenced off SRF population in the northeast of the offset area is recommended (assuming it has not occurred within the last three years). If utilised this must only occur in early April. Biomass throughout the offset area was originally recommended to be managed through strategic grazing only as burning was not considered suitable due to Golden Sun Moth and Striped Legless Lizard habitat. It has since been understood that low intensity mosaic burning is an appropriate tool for management as long as this is restricted to outside the active period for these species, outside the flowering period for SRF and completed at the appropriate intervals (approximately ever three years but may be required more frequently in high rainfall periods or less frequently in drought periods) (DCCEE 2024). Low intensity mosaic burning in early Autumn is

recommended to occur within the northeast corner of the offset site where the large population of SRF are located and currently fenced off, particularly focused around the fringes of the lower lying depression where biomass is currently high. This is not required across the rest of the offset site as it is currently being grazed strategically to control biomass. However, as the SRF area is fenced off and appears to be excluded from strategic grazing, it is not clear how biomass is being managed within this area. It should be highlighted that strategic grazing is not recommended within the SRF area as grazing can be a threat for SRF in some sites.

Yours sincerely,

Suzie Moss

Botanist and Project Manager
Nature Advisory Pty Ltd

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References

- Brett Lane and Associates (BL&A) 2015, *1541 Rokewood-Shelford road, Rokewood: Offset Management Plan for Matters of National Environmental Significance, Report No. 14094 (3.2)*, Brett Lane and Associates Pty Ltd, Hawthorn, Victoria.
- DCCEEW 2024, National Recovery Plan for the Spiny Rice-flower *Pimelea spinescens* subspecies *spinescens*, Department of Climate Change, Energy, the Environment and Water, Canberra,
- Department of the Environment, Water, Heritage and the Arts (DEWHA) 2009, *Significant impact guidelines for the critically endangered spiny rice-flower (Pimelea spinescens subsp. spinescens): Nationally threatened species and ecological communities - EPBC Act policy statement 3.11*, Department of the Environment, Water, Heritage and the Arts, Canberra.
- Nature Advisory 2020, *Burnside Hub Activity Centre: Year 4 Rokewood Offset Site Surveys, Letter Report No. 14094.10*, Nature Advisory Pty Ltd, Hawthorn, Victoria.