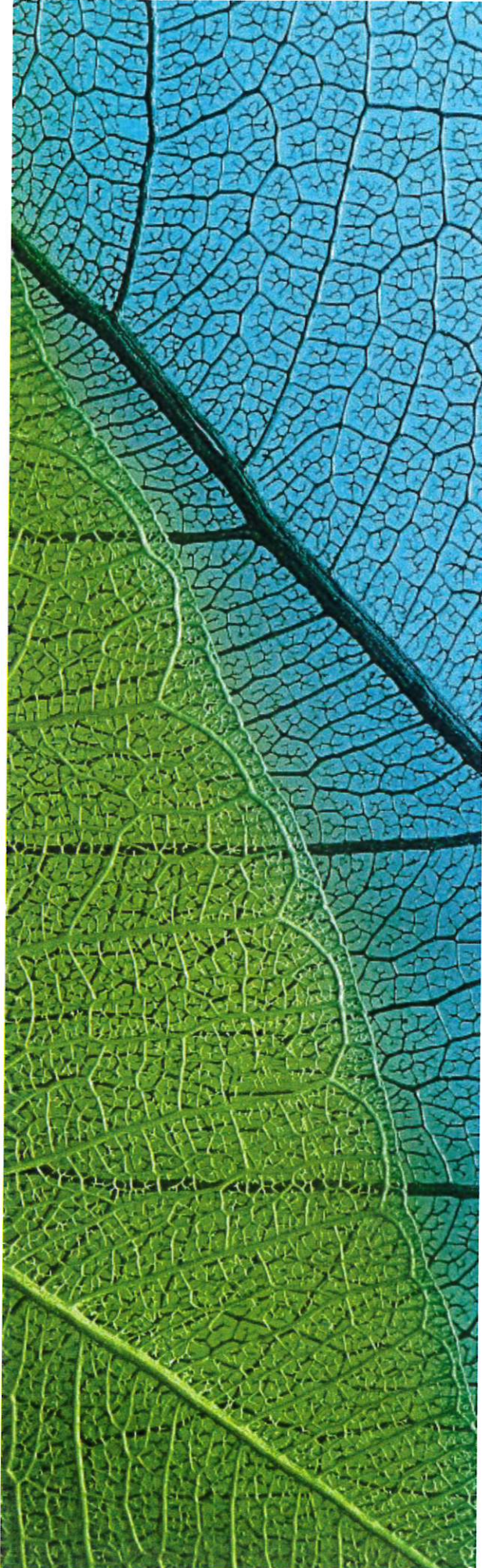




Burnside Hub Activity Centre

Rokewood Offset Compliance Report – Year 8

Prepared for DFC (Project
Management) Pty Ltd

June 2025
Report No. 7045.71 (4.0)



Nature
Advisory

(Formerly Brett Lane & Associates Pty Ltd)

5/61-63 Camberwell Road
Hawthorn East, VIC 3123
PO Box 337, Camberwell VIC 3124
(03) 9815 2111
www.natureadvisory.com.au

Contents

1. Introduction.....	3
2. Compliance with the offset management plan.....	4
2.1. Compliance monitoring – May 2025	4
2.2. Spiny Rice-flower monitoring	4
2.3. SLL monitoring.....	4
2.4. GSM monitoring.....	4
2.5. Ongoing land-use commitments & management actions	4
2.6. Actions required.....	6
2.7. Fencing.....	9
2.8. Weed control.....	10
2.8.1. High threat weeds	10
2.8.2. Dominant weeds	12
2.9. Pest animals	13
2.10. Biomass	14
2.10.1. Strategic grazing for biomass management and annual weed control.....	14
2.10.2. Ecological burning for biomass reduction	14
2.11. Litter	15
3. References.....	17

Tables

Table 1: Ongoing land use and management commitments	4
Table 2: Actions required to comply with OMP	6
Table 3: High threat weed control – method and timing	11
Table 4: Dominant weed control – method and timing	13

Figures

Figure 1: Weeds and key threats within the Rokewood Offset site	16
---	----

Appendices

Appendix 1: Photographs of the offset site	18
--	----

1. Introduction

DFC (Project Management) Pty Ltd engaged Nature Advisory Pty Ltd to conduct a monitoring assessment of a 78.61 ha offset site in Rokewood. The specific area investigated, referred to herein as the 'study area' (Figure 1), comprised two areas within the property at 1541 Rokewood-Shelford Road, Rokewood (SPI: 46A\PP3485 & 46B\PP3485).

This report addresses the compliance of management actions prescribed in the approved Offset Plan (BL&A 2015) to account for the loss of Matters of National Environmental Significance (MNES) associated with the Burnside Hub Activity Centre development following an assessment under the EPBC Act (EPBC 2011/6004).

Specifically, the scope of the investigation included the following:

- Review of compliance requirements and background information including the following:
 - Fencing
 - Weed Control
 - Pest animal control
 - Biomass management

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

2. Compliance with the offset management plan

The Offset Plan (OP) for this site was prepared by Brett Lane & Associates (now Nature Advisory) in 2015 (BL&A 2015).

2.1. Compliance monitoring – May 2025

An onsite compliance monitoring inspection was conducted on 22 and 23 May 2025. During this assessment, information relevant to the OP was gathered across the study area.

2.2. Spiny Rice-flower monitoring

Monitoring of Spiny Rice-flower was not conducted during the current assessment as it is scheduled to be conducted later in the year, during peak detection period for this species.

2.3. SLL monitoring

Monitoring of Striped Legless Lizard was not conducted during the current assessment as it is scheduled to be conducted later in the year, during peak detection period for this species.

2.4. GSM monitoring

Monitoring of Golden Sun Moth was not conducted during the current assessment as it is scheduled to be conducted later in the year, during peak detection period for this species.

2.5. Ongoing land-use commitments & management actions

Table 1 outlines the ongoing management commitments under the OP, and where in this report these are addressed.

Table 1: Ongoing land use and management commitments

Ongoing land use and management commitments			
	Commitment	Compliance	Report Section
Land use commitments	Retain all NTGVVP and Spiny Rice-flower and Striped Legless Lizard habitat in the offset sites;	Compliant	N/A
	- Maintain the improvement gain achieved at completion of this offset plan such that: - Overall weed cover does not increase beyond the level attained at the completion of Year 10; and - Pest animals are controlled to the level attained at the completion of Year 10.	Requires further action	- See section 2.8 - See section 2.9
Management commitments	Control all on-site grazing threats (i.e. rabbits, hares and other herbivorous pests, if identified).	Requires further action	See section 2.9

	▪ Control all on-site predatory pest animals (i.e. foxes, feral cats and other carnivorous pests, if identified.	▪ Ongoing	▪ See section 2.9
	▪ Implement a biomass management strategy (Periodic biomass reduction at agreed timing/frequency) – to the satisfaction of the Commonwealth Department.	▪ Ongoing	▪ See section 2.10
	▪ Eliminate identified high threat weeds, reduce the cover of other identified threatening weeds and ensure that cover of other weeds does not increase beyond the level it was prior to inception of the offset plan.	▪ Requires further action	▪ See section 2.8

2.6. Actions required

Based on the results of the Year 8 monitoring assessment, it is recommended that management actions continue as outlined in the Offset Management Plan. Current management actions to meet the obligations under the OMP are documented in Table 2 as follows.

Table 2: Actions required to comply with OMP

Compliance requirement	OMP obligation		Management actions to be undertaken	Report Section
Fencing	Offset areas will be fenced permanently to prevent uncontrolled stock access and inadvertent damage to vegetation.		- General maintenance and upgrading of fencing around the entire perimeter of the offset sites to maintain suitable stock exclusion. - Ensure the rabbit proof fencing around habitat zone 20 is functional and excluding rabbits effectively.	Section 2.7
Weed Control	Ensure weed cover does not exceed the level at the commencement of the plan.		- Continue weed control using appropriate methods (see Table 3 and Table 4) to meet targets. - Weed control using herbicide is not to be undertaken in Habitat Zone 20	Section 2.8
	Woody Weeds	All woody weeds in the credit site must be eliminated.	Continue control of woody weeds using appropriate methods (see Table 3) to meet elimination targets.	
		Monitoring for new and emerging woody weeds should be conducted throughout the year for the term of the agreement, and any new and emerging woody weeds eliminated.	Continue to monitor for new and emerging woody weeds across the offset site throughout the year.	
	Herbaceous weeds	Ensure that herbaceous weed cover does not increase beyond current levels.	Continue control of herbaceous weeds using appropriate methods (see Table 3 and Table 4) to ensure total cover of herbaceous weeds does not increase beyond baseline assessment levels.	
		Monitoring for new and emerging herbaceous weeds should be conducted throughout the year for	Continue to monitor for new and emerging herbaceous weeds across the offset site throughout the year.	

Compliance requirement	OMP obligation		Management actions to be undertaken	Report Section
		the term of the agreement, and any new and emerging weeds eliminated.		
Biomass management	Strategic grazing	Strategic grazing will be undertaken using sheep in late summer to early winter where it is determined that the proportion of annual weeds is $\geq$ 25% of the total vegetation cover. Grazing will be removed in early winter or if total vegetation cover falls below 70% (whichever is sooner).	- As required, continue management of biomass through ecological grazing within all habitat zones (excluding HZ 20) at the appropriate time with grazing removed in early winter or if total vegetation cover falls below 70% (whichever is sooner). - As required, continue management of biomass through ecological grazing within Habitat Zone 20 at the appropriate time (i.e., not April to August inclusive) with grazing removed in early winter or if total vegetation cover falls below 70% (whichever is sooner). - No grazing is to occur from November to January (i.e., the Golden Sun Moth peak flight period). - No grazing is to occur when the soil is too wet or the soil is too dry. - A record of the timing of ecological grazing in each habitat zone, noting the dates of grazing and number of stock, should be kept to demonstrate that ecological grazing is being conducted in accordance with the OMP.	Section 2.10.1
	Ecological burning		The offset sites are to remain unburnt in accordance with the OMP, however justification for this is not sound and in cases where burning is the most effective means of biomass control, this method should be considered as long it is within a safe period for SLL and GSM and <u>not</u> within SRF habitat or know locations	Section 2.10.2
Pest animal control	Rabbits and hares should be monitored and controlled throughout the year.		- Continue to monitor and control rabbits throughout the year using an integrated approach. - The rabbit burrow identified to the west of offset site A (Figure 1) must be collapsed.	Section 2.9

Compliance requirement	OMP obligation	Management actions to be undertaken	Report Section
		▪ If baiting is being used as a control measure, remove any carcasses to prevent poisoning of native predators.	
	Domestic stock (other than sheep) must be excluded from the offset site.	▪ Maintain fencing to a stock proof standard as a domestic pig and goat were observed within offset site A.	
	Foxes and cats are a threat to native fauna and should be controlled if found on the property. Fox dens, where present, are to be removed.	▪ Continue to monitor and control foxes and cats throughout the year using an integrated approach.	
	Monitor and control all new and emerging pest animals	▪ Continue to monitor for any new and emerging pest animals year-round and implement suitable control where necessary.	
Annual Reporting	Prepare and submit an annual report to the Responsible Authority that is a signatory to the on-title agreement	▪ Annual report is signed, dated and submitted by the landowner no more than 3 months following the anniversary date of the agreement ▪ Report provides enough detail in the form of written comments and supporting evidence that an assessor can easily determine the completion of / progress against the commitments for each zone	N/A

2.7. Fencing

The perimeter fencing of the two offset zones within the property are fenced with wire strands and/or mesh. During the current assessment, new fencing was being erected along the north-eastern boundary of offset site B.

The perimeter fencing of both offset zones was failing to prevent the movement of domestic stock as sheep were seen crossing a fallen fence in the south-east of offset site B (Photo 1) and a goat and pig were observed along the eastern boundary of offset site A. Fallen fences, holes and loose wiring (Photo 2) require general maintenance and/or upgrading to return fencing to a stock-proof standard. Any fencing to be upgraded should be constructed to the standards outlined in the BushBroker®: Standards for management – Fencing – Information sheet No. 12 (DSE 2009).

Furthermore, the western boundary of offset site B was found to encroach upon the credit site (See Figure 1) and is required to be realigned to include the entirety of offset zone B.

Internal 'rabbit-proof' fencing had been erected in the north-east of offset site A to protect a significant population of the Critically Endangered Spiny Rice-flower. However, this fencing was not adequately constructed to exclude rabbits as much of the rabbit netting fixed to the base of the fence was placed over rocks allowing for gaps underneath (Photo 4), a hole from fence construction was not filled in after construction had ceased (Photo 5) and many areas of disturbance under the fence and gates were observed suggesting that rabbits are actively entering/exiting the site (Photo 6). It is crucial that significant works are undertaken to achieve and maintain rabbit-proof status of this area. Additionally, rabbit control is discussed in Section 2.9.



Photo 1: Fallen perimeter fencing that sheep were seen crossing



Photo 2: Fencing with loose wiring



Photo 3: Hole in perimeter fencing that pig was seen using



Photo 4: Rabbit netting placed over rock allowing gaps underneath



Photo 5: Hole made during fence construction that was not filled in



Photo 6: Disturbance under rabbit-proof fence

2.8. Weed control

As per the OP, weed treatment using herbicide is not to be undertaken in Habitat Zone 20 (see Figure 1), as there is a high risk of inadvertent poisoning of Spiny Rice-flower, given the high population density. Additionally, in all other areas hand-weeding is to be undertaken around sensitive and/or threatened flora species, such as Spiny Rice-flower, prior to spot spraying to avoid off-target damage to these plants.

2.8.1. High threat weeds

Woody weeds were observed only within offset site A at very low levels.

A single individual of Sweet Briar was recorded in the south-east of offset site A, a few scattered individuals of African Box-thorn and Giant Honey-myrtle recruits were recorded in the north-east of the site. As all of these species weren't identified in the original OP they are considered new and emerging weeds and must be eliminated.

The low-level cover of woody weeds suggests that they are being actively controlled across the offset site. Ongoing monitoring and control are recommended to prevent the spread of woody weeds across the study area.

High threat herbaceous weeds were scattered across both offset sites. Offset site A had scattered Spear Thistle and a single individual of Bathurst Burr in the south-west. Offset site B had major infestations of Spear Thistle, smaller infestations and scattered individuals of Serrated Tussock and a single individual of Bathurst Burr in the south-east.

Significant action is needed to control all the high threat herbaceous weeds that occur within the offset sites. It is also recommended that these high threat herbaceous weed species are targeted across the broader property to prevent continual re-infestations across the offset site and meet legal responsibilities under the *Catchment and Land Protection Act 1994* (CaLP Act).

Under the CaLP act, property owners who do not eradicate regionally prohibited weeds or prevent the growth and spread of regionally controlled weeds for which they are responsible may be issued with a Land Management Notice or Directions Notice that requires specific control work to be undertaken.

The previously recorded high threat herbaceous weed, Paterson's Curse, was not recorded during the current assessment as it is the wrong time of year to survey for this species.

Table 3: High threat weed control – method and timing

Common name	Scientific name	Offset site(s)	Method	Timing	Current cover (May 2025)	Required cover
African Box-thorn	<i>Lycium ferocissimum</i>	A	▪ <u>Cut and paint with suitable herbicide:</u> Cut stem and paint cut stump immediately (within 20 seconds) with systemic herbicide. ▪ <u>Spot spray seedlings with appropriate herbicide.</u>	All year	< 1%	0%
Sweet Briar	<i>Rosa rubiginosa</i>	A	▪ <u>Cut and paint with suitable herbicide:</u> Cut stem and paint cut stump immediately (within 20 seconds) with systemic herbicide. ▪ <u>Spot spray seedlings with appropriate herbicide.</u>	Autumn and spring	< 1%	0%
Giant Honey-myrtle	<i>Melaleuca armillaris</i> subsp. <i>armillaris</i>	A	▪ <u>Cut and paint with suitable herbicide:</u> Cut stem and paint cut stump immediately (within 20 seconds) with systemic herbicide.	All year	< 1%	0%

Common name	Scientific name	Offset site(s)	Method	Timing	Current cover (May 2025)	Required cover
			▪ <u>Spot spray seedlings with appropriate herbicide.</u>			
Other woody weeds		All	▪ Monitor and eliminate all new and emerging woody weeds.	Ongoing		
Paterson's Curse	<i>Echium plantagineum</i>	All	▪ Spray with an appropriate herbicide	Prior to flowering in late spring and autumn	N/A	< 1%
Spear Thistle	<i>Cirsium vulgare</i>	All	▪ Spray with an appropriate herbicide	Prior to flowering in late spring and autumn	10%	< 1%
Serrated Tussock	<i>Nassella trichotoma</i>	All	▪ Spray with an appropriate herbicide	Prior to seed set in late spring and continually every three months or as required.	2%	0%
Texas Needle-grass	<i>Nassella leucotricha</i>	A	▪ Spray with an appropriate herbicide	Prior to seed set in late spring and continually every three months or as required.	< 1%	0%
Bathurst burr	<i>Xanthium spinosum</i>	All	▪ Spray with an appropriate herbicide	Prior to flowering in late spring and autumn	< 1%	0%
Other high threat herbaceous weeds		All	▪ Monitor and eliminate all new and emerging high threat herbaceous weeds.	Ongoing		

2.8.2. Dominant weeds

The dominant weeds across the study area continue to be Toowoomba Canary-grass and Onion Grass. Whilst not declared high-threat weeds in the OP, cover of these weed species is to decrease from baseline levels.

Control of Toowoomba Canary-grass should be implemented using spot spraying with a suitable herbicide; whilst control of Onion Grass is to be implemented using prescribed grazing (see section 2.10.1).

Table 4: Dominant weed control – method and timing

Common name	Scientific name	Offset site(s)	Method	Timing	Current cover (May 2025)	Required cover
Toowoomba Canary-grass	<i>Phalaris aquatica</i>	All	▪ Spot spray using an appropriate herbicide.	All year	65%	10%
Onion Grass	<i>Romulea rosea</i>	All	▪ Strategic grazing	All year	10%	<2%

2.9. Pest animals

Multiple pest animals were observed in the offset site during the current assessment. As stated in the OP, this offset site requires a greater level of pest animal control than that required under the CaLP Act.

Rabbit and hare activity was recorded within the offset sites and within the broader property during the current assessment. Observations of faeces, diggings (Photo 7) and a warren (Photo 8) were made.

The CaLP Act lists rabbits as established pest animals and requires that all landowners take reasonable steps to prevent the spread of, and as far as possible eradicate, established pest animals on their land.

As per the OP, rabbits must be monitored and controlled throughout the year using an integrated approach. Control must be in accordance with the *BushBroker®: Standards for management – Rabbits - Information Sheet 7* (DSE 2012).

A domestic pig (Photo 9) and goat (Photo 10) were observed. These animals were able to access offset site A through breaches in the eastern boundary fence (See section 2.7; Figure 1). Repairing the fencing to stock-exclusion status will likely fix this problem.

No fox or cat activity was recorded within the study area during the current assessment. Continual monitoring for foxes and cats on the property must occur throughout the year and must be controlled using an integrated approach if detected.



Photo 7: Rabbit activity within the rabbit-proof fenced area in the north-east of offset site A



Photo 8: Rabbit warren observed to the west of offset site A.



Photo 9: Pig within offset site A.



Photo 10: Goat within offset site A.

2.10. Biomass

Biomass levels were suitable (i.e., low to moderate) in all habitat zones.

Strategic grazing and ecological burning for biomass management are discussed in the sections below.

2.10.1. Strategic grazing for biomass management and annual weed control

The biomass levels of all habitat zones were low to moderate with adequate inter-tussock space, organic litter and bare ground cover.

It is recommended that a record be kept of the timing and stocking rate of ecological grazing in each offset site, noting the dates of grazing and number of stock, to demonstrate that it is being conducted in accordance with the OMP.

2.10.2. Ecological burning for biomass reduction

The current Offset Management Plan (OMP) states that the offset site is to remain unburnt due to the presence of Golden Sun Moth and Striped Legless Lizard, claiming that fire would likely have negative impacts on these species. However, this justification is not supported by current scientific literature and is inconsistent with the National Recovery Plans for both species. While prescribed fire can pose risks if applied too frequently or outside of optimal periods, it is not considered detrimental when conducted during the species' dormancy phases.

2.11. If prescribed burning is identified as the most appropriate method for managing biomass and promoting grassland recovery, it should be undertaken during autumn, when post-summer conditions are most conducive to a safe and effective burn. Burning may also be carried out during winter to early spring, provided it avoids the active season of the Striped Legless Lizard and the pupation and flight period of the Golden Sun Moth (both September to January). Additionally, burns must not be conducted within mapped areas supporting Spiny Rice-flower, and an adequate buffer must be applied to prevent off-target impacts and potential mortality of this threatened species. Litter

Litter was observed within offset site A. Litter included scattered rubbish (Photo 11) along the northern boundary adjacent to Rokewood - Shelford Road. Old fencing material comprising posts and wires (Photo 12) was present in the centre of offset site A. All the litter identified within offset site A (Figure 1) must be removed.



Photo 11: Scattered rubbish along the northern boundary of offset site A



Photo 12: Old fencing within the centre of offset site A



3. References

- Brett Lane & 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 & Associates Pty Ltd, Hawthorn East, consultant report prepared for Dennis Family Corporation Pty Ltd.
- Department of Sustainability and Environment (DSE) 2009, *Standards for management – Fencing: Information sheet No. 12*, Department of Sustainability and Environment, Melbourne.
- Department of Sustainability and Environment (DSE) 2012, *Standards for management – Rabbits: Information sheet No. 7*, Department of Sustainability and Environment, Melbourne.

Appendix 1: Photographs of the offset site

All photographs were taken on 22 and 23 May 2025.



Habitat Zone 1



Habitat Zone 2



Habitat Zone 12



Habitat Zone 13



Habitat Zone 14



Habitat Zone 20



Habitat Zone 24



Habitat Zone 28



Habitat Zone 29



Habitat Zone 30



Habitat Zone 31



Habitat Zone 34



Habitat Zone 36



Habitat Zone 37



Habitat Zone 38



Habitat Zone 40



Habitat Zone 41

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

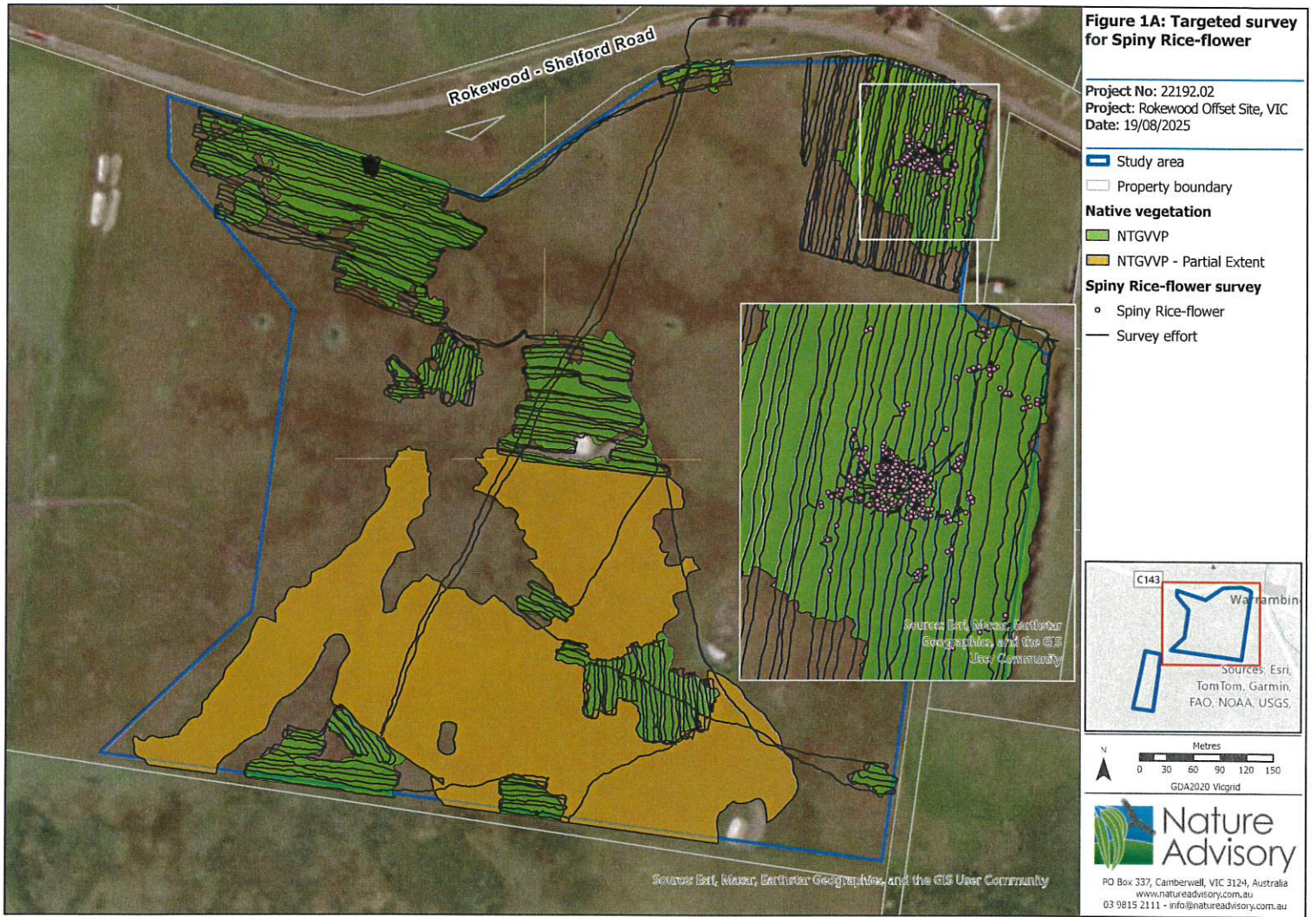
The survey methods used for this investigation were in accordance with the methods outlined in the *Significant Impact Guidelines for the critically endangered Spiny Rice-flower Pimelea spinescens subsp. spinescens* (DEWHA 2009), on 12 to 14 August 2025. These methods included:

- 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.



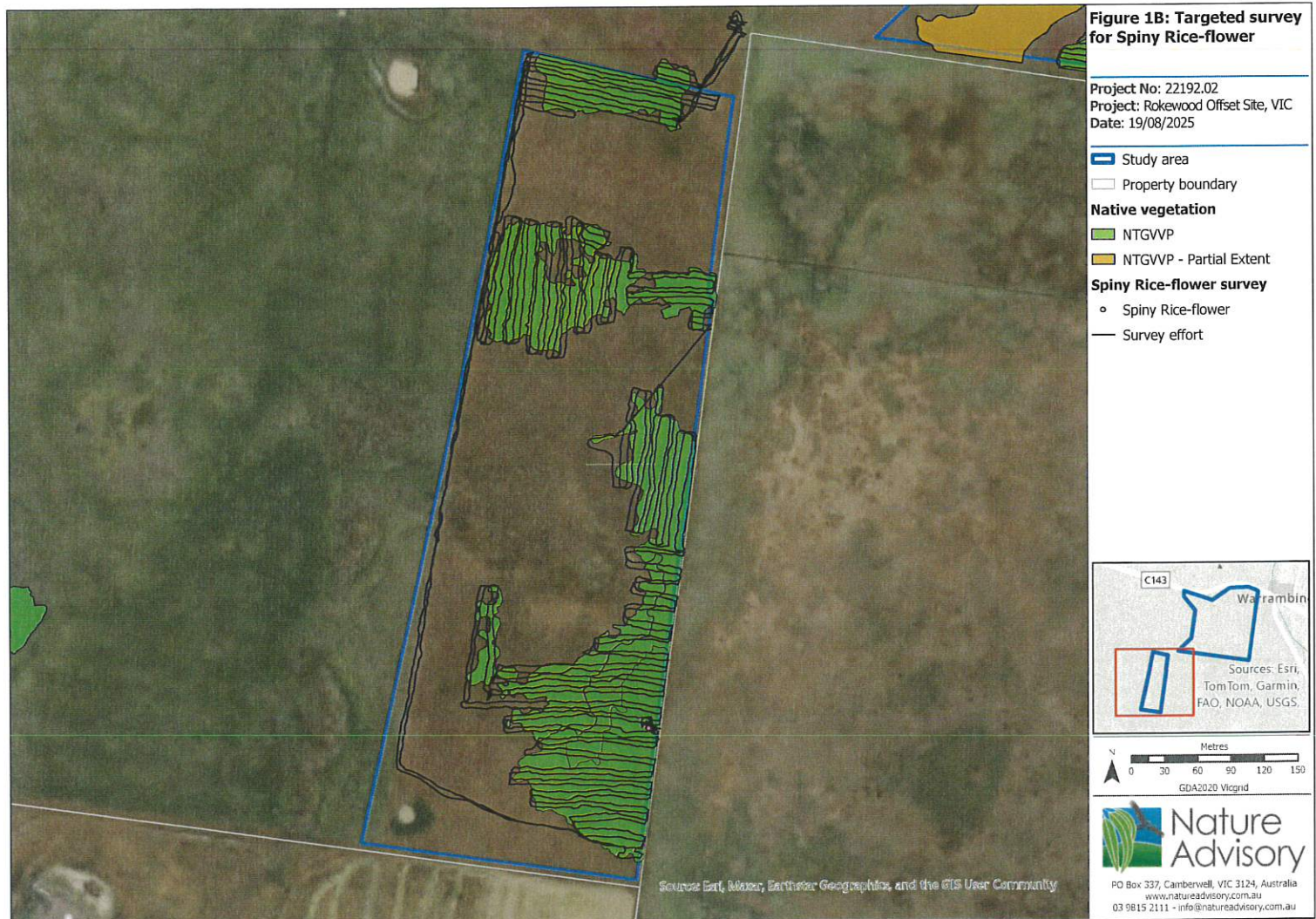


Figure 1B: Targeted survey for Spiny Rice-flower. The map shows the study area, native vegetation, and survey effort. The study area is outlined in blue. Native vegetation is shown in green, with some areas in yellow indicating partial extent. Survey effort is marked with black lines. The map includes a legend, project details, an inset map, a scale bar, and the Nature Advisory logo.

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

(03) 9815 2111 | Suzie@natureadvisory.com.au

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.



~One of the best investments you can make in your property~

2025 ROKEWOOD Offset Compliance REPORT

Overview

Due to the very dry Spring in 2024 followed by a long dry Summer and Autumn in 2025, Small Farm Contracting was able to access all areas of the property.

All rocky areas on the property enabled confident access to the entire property.

Works were undertaken by the Small Farm Contracting Team between and including 18th June and 4th July.

Site A:

In the area of the critically endangered Spiny Rice-flower, the full boundary fence was secured to prevent possible rabbit entry. At the boundary fence, netting was cut for rock protrusion keeping the netting horizontal, secured by rocks and impenetrable to rabbits.

The Sweet Briar and Giant Honey Myrtle (Sticky Wattle) plants were cut and chemically treated-the cuttings removed offsite. Serrated tussock and Spear Thistle plants were also chemically treated.

The Spiny Rice-flower has recovered strongly after SFC control burn in 2024. These areas of Spiny Rice-flower growth are clearly visible by the distribution of shiny bolt washers laid down in these areas by the Bush broker personnel.

In Site A the Small Farm Contracting team found that the eastern boundary fence had been opened and the neighbour (John) allowed his sheep to feed on 'Wyndabar'. The pig and goat also entered through this fence breach. The fence was secured against stock.

The eastern fence is basically sub-standard (John-0432702347). His block is overstocked with minimal pasture and stock are putting pressure on the boundary fence.

Treatment:

Spot spraying and total control of Serrated Tussock particularly high infestations in rocky areas. See images attached.

5 x African Box Thorn plants were found and treated and there were 3 areas of rabbit activity all of which were treated with gas tablets.

Site B:

This site has been grazed by stock in 2024-2025 so visibility of rocky areas was good. The stock have greatly reduced the Canary Grass canopy. The area was combed for weeds and spot spraying of Serrated Tussock, Spear Thistle and Bathurst Burr were controlled. The gate was secured once completed.

All areas of 'Wyndabar':

The remainder of the 'Wyndabar' property was checked for weeds and all Serrated Tussock and herbaceous weeds found were controlled.

Total chemical applied:

Weeds:

3500 litres. Glysophate, Devour 1020 (Wetter) Redye marker dye. Method of application: High pressure-Spot spraying- Spray Utes with twin remote 150m hose reels. In addition, 3 x Landboss side by side 4-wheel drive all-terrain vehicles were used.

Rabbits:

Phostoxin gas tablets

Always committed to best practice and optimal outcomes, Small Farm Contracting was committed to this important Rokewood Offset Compliance project.

Kind regards,

Graham Hewitt
Small Farm Contracting Pty. Ltd.
Manager

www.smallfarmcontracting.com.au
mobile: 0417044464

Marshall G. Dennis

From: grahamrhewitt@gmail.com
Sent: Tuesday, 23 September 2025 3:01 PM
To: Marshall G. Dennis; Marshall G. Dennis
Subject: REPORT Offset Compliance Works for MG Pastoral Pty. Ltd on Site B at 'Wyndabar' Rokewood, Victoria.

Dear Marshall,

Please find attached below:

REPORT

Offset Compliance Works for MG Pastoral Pty. Ltd on Site B at 'Wyndabar' Rokewood, Victoria, services supplied by the Small Farm Contracting team.

Kind regards,
Graham Hewitt
Small Farm Contracting



REPORT

Offset Compliance Works for MG Pastoral Pty. Ltd on Site B at 'Wyndabar' Rokewood, Victoria.

Works:

Completion of a highly intensive, precise, methodical weed-control program, mostly targetting high infestations of Phalaris plants, at 'Wyndabar', Rokewood for OFFSET COMPLIANCE WORKS on SITE B, services supplied by an extended Small Farm Contracting team.

Method of chemical application:

Spot-spraying was undertaken with 2 x Landboss side-by-side ATVs equipped with 300 litre spray tanks for spot-spraying.

Additionally, 1 x Ford ranger Ute equipped with 600-litre spray tank and 2 x 150m remote-controlled hose reels.

2000 litre 'mother tank' on site.

Chemical applied

Glysophate, Devour1020 Wetter & Red marker dye
26 300 litres of chemical applied.

Summary:

Phalaris- 'Toowoomba Canary Grass'

Great care taken to identify weeds, mostly Phalaris, from native grasses -the former now being well-controlled and the latter, the protected plant species, are growing strongly in most areas.

There were several areas of high infestation, other more rocky areas had light to medium infestations.

Excellent control has been achieved.

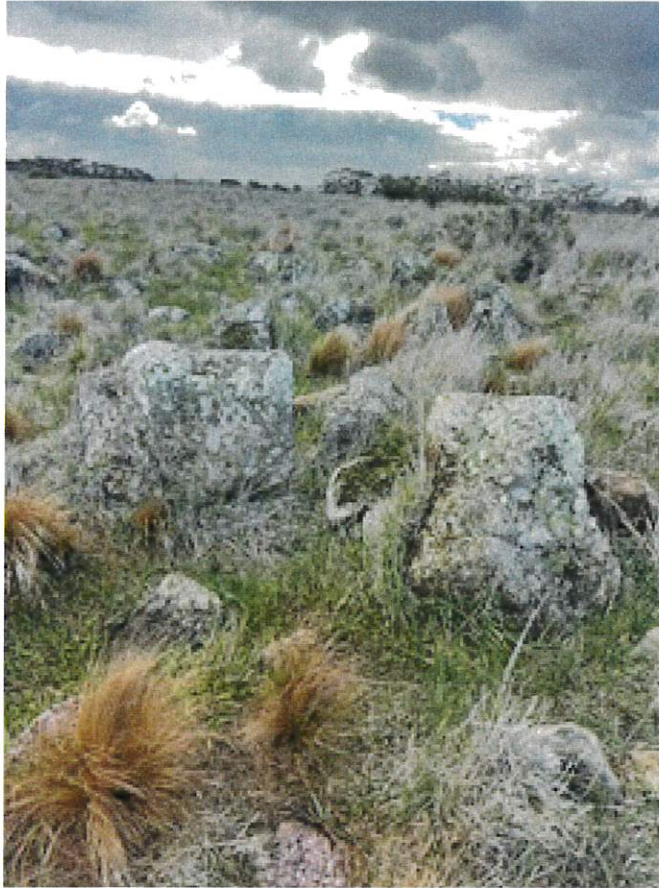
A few Thistles in the rosette stage were found and controlled, and in the rocky ridges approximately 12 areas of newly seeded Paterson's Curse weeds were discovered-now fully controlled.

Photographs can be forwarded.

Always committed to best practice and optimal outcomes, Small Farm Contracting is committed to the important project of crucial weed elimination and native plant protection at 'Wyndabar', Rokewood.

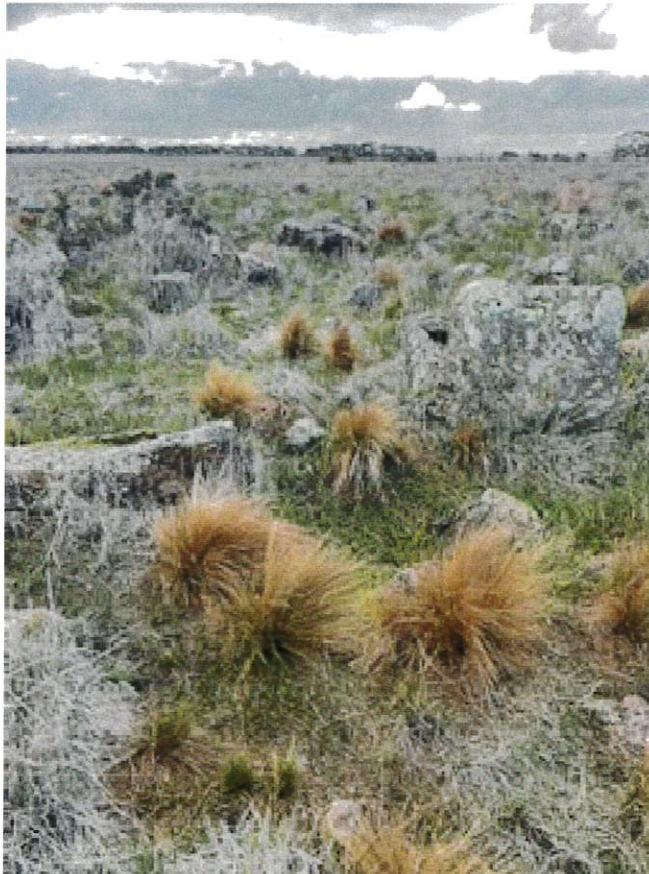
Graham Hewitt
Manager

grahamrhewitt@gmail.com
www.smallfarmcontracting.com.au
mobile: 041 7044464



SERRATED TUSsock
TREATMENT : AREA A
(NOT SRF HAB. ZONE #20).

NOTE: PINK DYE VISIBLE
IN IMAGE (JUST-).



18th December 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
NTGVVP Targeted Survey
PROJECT NUMBER 22192.05

MG Pastoral Pty Ltd engaged Nature Advisory Pty Ltd to undertake targeted surveys for the EPBC Act-listed Natural Temperate Grasslands of the Victorian Volcanic Plain (NTGVVP) ecological community at the 78.61 ha offset site in Rokewood.

The property subject to this investigation involved two areas which comprise the offset site within the property at 1541 Rokewood-Shelford Road, Rokewood (SPI: 46A\PP3485 & 46B\PP3485) (referred to herein as the 'study area', Figure 1); Site A (Figure 1A) and Site B (Figure 1B) refer to the north and south land parcels, respectively.

This assessment was undertaken to satisfy EPBC compliance requirements and approval conditions (EPBC 2011/6004) 2 and 3, specifically points relating to the total area and condition of NTGVVP; 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 7 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).*

This report details the outcome of the required NTGVVP surveys. The outcome of these site surveys will then inform adaptive management recommendations to be implemented, to meet EPBC Act Approval Condition outcomes by Year 10 (2026) from the date of approval. It should also be noted that this letter report is written to satisfy the Year 7 requirements; however, this report and associated surveys were carried out in Year 9 (2025) of management.

This investigation was undertaken by a team from Nature Advisory comprising Neassa Fritchley (Botanist), Kate Thurkle (Botanist), Sage Runciman (Ecologist), and Suzie Moss (Botanist & Project Manager).

Methodology

A field survey was undertaken between 15 - 17 December 2025. The entire study area was assessed, with priority given to areas previously assessed as NTGVVP. During the field survey, vegetation was assessed against the Commonwealth Listing Advice for the NTGVVP (DEWHA 2008). Patches of NTGVVP were mapped using ArcGIS Field Maps® (ESRI) when a patch was a minimum size of 0.05 ha and met **one** of the following condition thresholds:

- The total perennial tussock cover represented by the native grass genera *Themeda*, *Austrodanthonia* (now *Rytidosperma*), *Austrostipa*, or *Poa* is at least 50%.

OR

- If the total perennial tussock cover represented by the above 4 native grass genera is less than 50%, then the ground cover of native forbs (wildflowers) is at least 50% of total vegetation cover during spring-summer (September to February).

OR

- The cover of non-grass weeds is less than 30% of total vegetation cover at any time of the year.

In the initial assessment (BL&A 2014), a large portion of Site A was mapped under *NTGVVP - Partial Extent* (Zone 40). This area was assumed to contained 50% of NTGVVP, given its patchy and irregular occurrence. During the current assessment, the *NTGVVP - Partial Extent* (Figure 1) now highlights grassland with the potential to meet the condition thresholds stated above, but were currently too fragmented or weed-cover was slightly too high to meet the minimum size or cover requirements. Given the significant weed encroachment, the results only attribute 35% of the area of *NTGVVP - Partial Extent* patches to the total area of NTGVVP.

In addition, this survey assessed the condition of NTGVVP within the offset site to determine whether the offset site will meet the requirement of a 0.8 condition score by year 10 (2026).

Patch condition was assessed using the *Habitat Hectare* method (Parkes et al. 2003; DSE 2004b), whereby components of the patch present at the time of the survey were compared against an EVC benchmark. The patch's score effectively measures the percentage resemblance of the vegetation to the original condition (pre-colonisation). Patches of NTGVVP were assessed under the *Habitat Hectare* method only when they exhibited characteristics distinct from those previously mapped to capture a representative average score for the offset site.

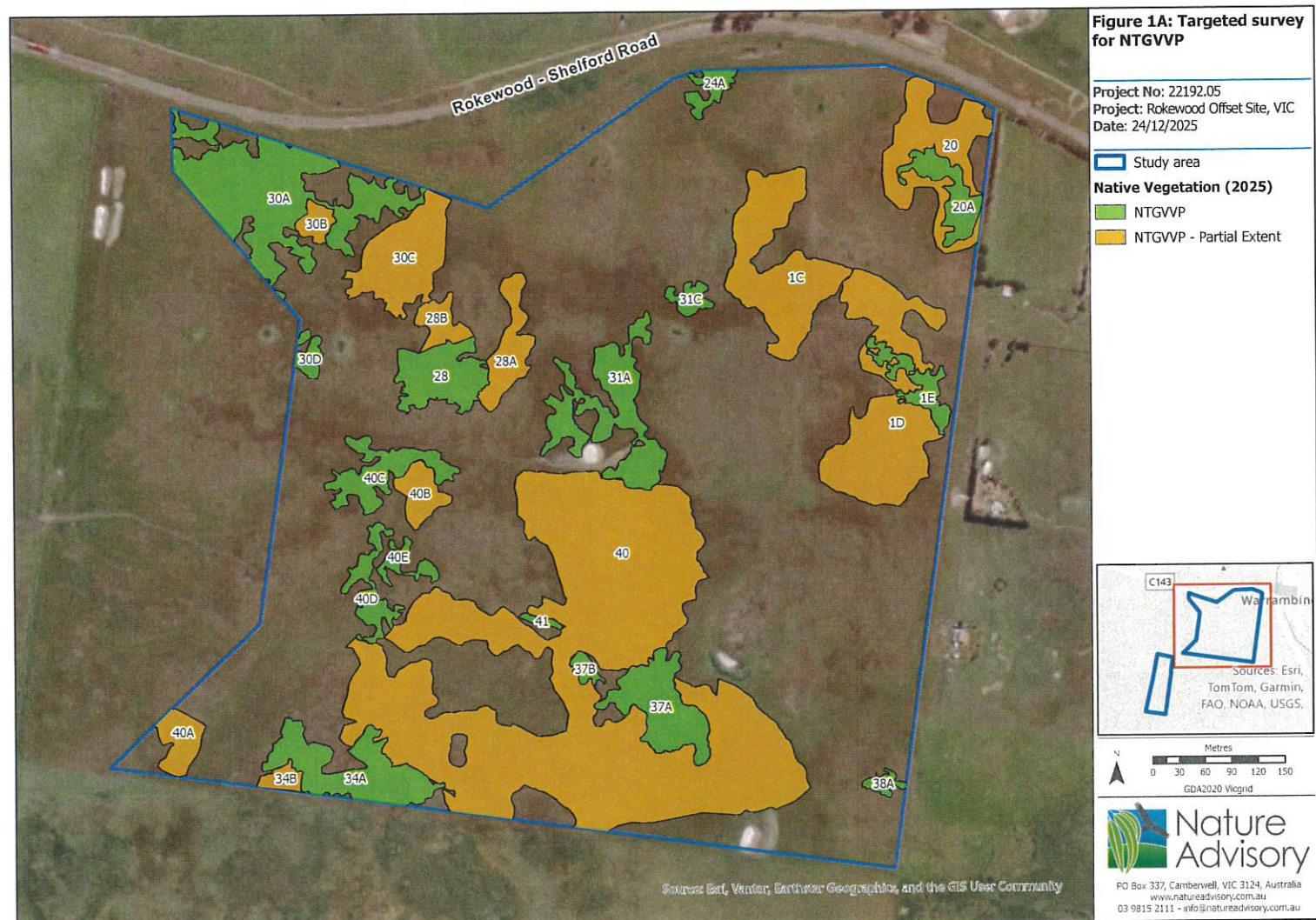
Existing Information

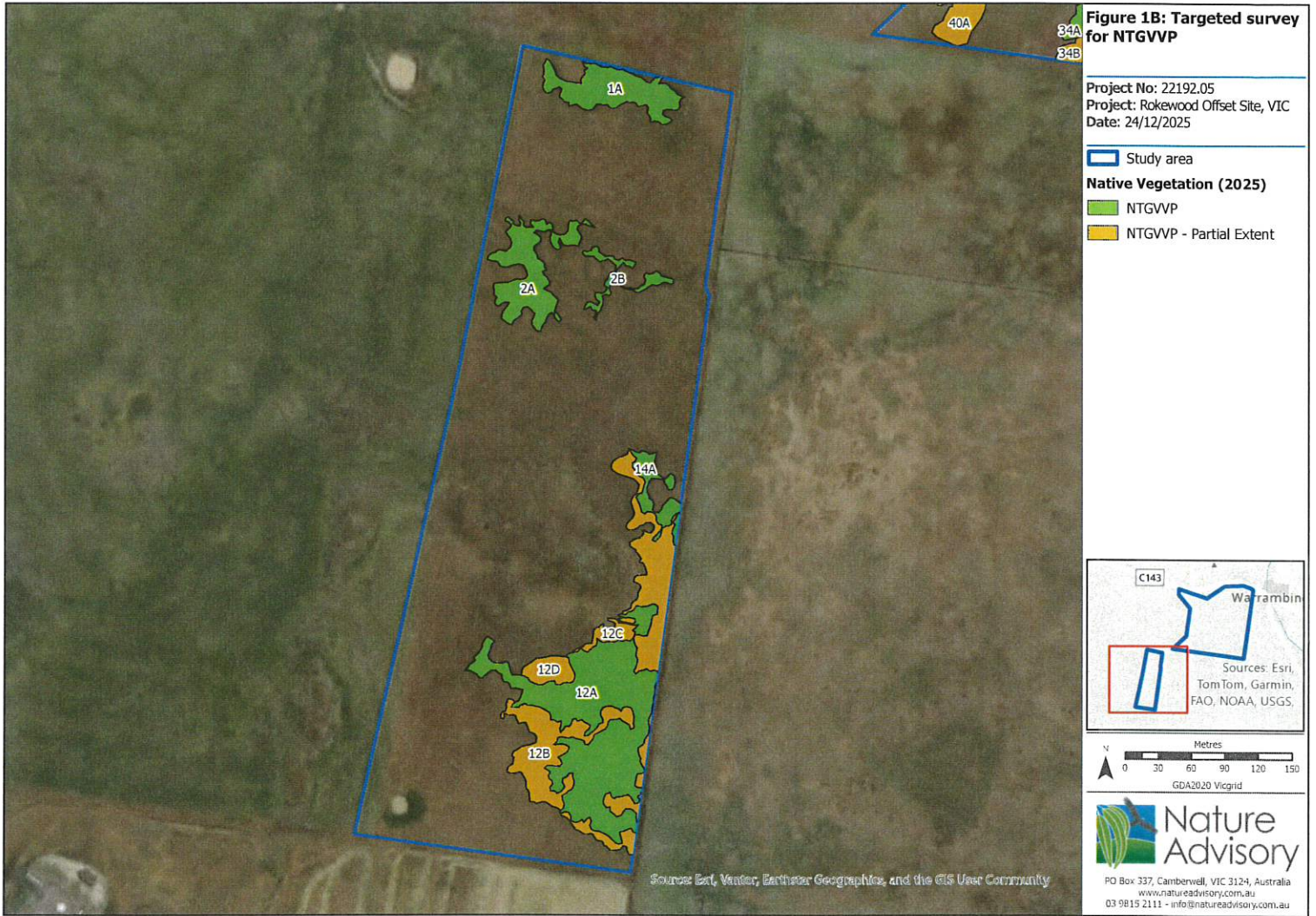
The initial survey of this offset site was conducted by Nature Advisory (previously Brett Lane & Associates) (BL&A 2014), followed by EPBC compliance monitoring in 2021 (Nature Advisory 2021).

The offset site originally supported 22.424 ha of NTGVVP in 2014. 15.31 ha was mapped in detail; the remaining 14.228 ha was considered to constitute 50% (i.e. 7.114 ha) of NTGVVP (BL&A 2014). This area was not surveyed in detail due to its size, condition, and composition, making it extremely difficult to locate and map areas that fulfilled the condition thresholds for NTGVVP.

The 2021 survey was unable to accurately determine the total extent of NTGVVP due to prolonged sheep grazing throughout the site; as such, broad comparisons were made, noting an overall reduction in the extent and quality of NTGVVP in sites A and B. This was due to significant weed invasion, primarily Toowoomba Canary-grass (TCG) (*Phalaris aquatica*), Onion Grass (*Romulea rosea*) and other annual grasses. There was particular concern about the impact this weed invasion will have on the total extent and quality of the NTGVVP, stating a “negative trajectory” in meeting the approval condition requirements to maintain the extent and increase the quality of NTGVVP by the end of year 10.

The results of the 2025 survey are presented below.





Survey Results

NGWVP Area

This survey found 9.6 ha of NTGVVP within the study area and 17.2 ha of partial NTGVVP (Figure 1). Based on the assumption that approximately 35% of the partial NTGVVP mapped comprised NTGVVP, this area likely equates to approximately 6 ha of additional NTGVVP equalling **a total of approximately 15.6 ha of NTGVVP within the study area**. This means that in 2025 there has been an overall **decrease** of NTGVVP in the study area.

Site A has seen a decrease in NTGVVP but contains the majority of current NTGVVP extent (7.4 ha). Some patches have largely maintained their size, such as HZs 34, 36, and 38 while others have naturally fluctuated in shape and size as expected for grassland vegetation. However, there is a clear trend of fragmentation throughout the offset site, for example, HZs 2, 14, 37, 40 and 41 have all decreased in area.

Site B has also seen a decrease in NTGVVP with 2.2 ha remaining in the current extent. Sections of Site B are now considered under the *Partial Extent* (Photo 3), as much of the initial grassland has similarly been overrun by TCG. See Table 1 for a summary of total areas from 2014 to 2025.

HZ 20 has had the largest reduction across the study area since 2014. This is of particular concern given that this area supports the highest proportion of the EPBC Act-listed Spiny Rice Flower population within the offset site. This size reduction is largely due to the continual encroachment of TCG from the surrounding paddocks. If TCG is left unmanaged, small emergent populations in patches of NTGVVP are expected to outcompete native graminoids, herbs, and forbs, thereby reducing the quality of the patch and capacity to meet the condition threshold requirements. See the *Recommendations* section below for more information.

Table 1: Summary of NTGVVP area within offset sites A and B

	2014		2025	
	NTGVVP	Partial (50% NTGVVP)	NTGVVP	Partial (35% NTGVVP)
Site A	10.519	14.228	7.4	16.1
Site B	4.791	0	2.2	1.1
Total	15.31	14.228	9.6	17.2
Overall NTGVVP	22.4 ha		15.6 ha	



Photo 1: NTGWVP in HZ 20A surrounded by Toowoomba Canary-grass



Photo 2: Dense Toowoomba Canary-grass surrounding HZ 20A



Photo 3: Visual representation of the mapped *Partial Extent*.

NTGVVP Condition Score

The average condition score for NTGVVP in 2014 was 0.46, the highest score being 0.61. The 2025 survey found that the average score for NTGVVP was now at 0.38; the highest-scoring patch was HZ 20A at 0.51. This is an overall decrease in the quality of NTGVVP throughout the offset site.

Therefore, at year 9 from the approval date, NTGVVP within the offset site is unlikely to meet the approval condition requirements to maintain the extent of NTGVVP and increase its quality to 0.8 by the end of year 10 (2026) from the approval date.

Recommendations

The comparison between 2014 and 2025 showed an overall decrease in the quality and extent of NTGVVP. Current management of grassland extent, condition, and biomass has largely relied on strategic grazing between late summer and early winter, alongside spot spraying high-threat weeds with herbicide in areas of remnant grassland (BL&A 2015). The results discussed in the letter report highlight that the current management regime requires revision and adaptive management should be implemented in order to maintain and increase the quality of NTGVVP within this offset site.

It should be noted that several factors can affect the quality and extent of native grasslands, including seasonal challenges (e.g. unusually warm winters and summers), which then result in an overall decrease in species abundance and a lack of low-intensity burning that stimulates new growth. The challenge of mapping NTGVVP is also noted and seasonal variation, differences in identifiability of grasses at the time of survey and observer differences are also noted as potential influences in mapping variation.

However, the main threat identified in this survey is the encroachment of Toowoomba Canary-grass, fragmenting and degrading patches of NTGVVP. One potential explanation for its dominance is that during the prescribed grazing months, Toowoomba Canary-grass tends to contain the highest concentrations of toxic alkaloids, which sheep may avoid consuming in favour of other grasses. Sheep are the primary grazers in these paddocks and it appears that TCG is not being effectively reduced by the current strategic grazing regime to suitable covers to maintain and increase NTGVVP. As a result, native grassland species would then be subject to additional grazing pressure, given their palatability.

The Offset Management Plan states that TCG “*comprised the vast majority of weed cover in the offset area...often limiting the regeneration of indigenous species*”. Given a lack of success of previous weed management of TCG, it has become one of the main threats to meeting the permit condition requirements by the end of year 10 (2026). As such, the following recommendations are provided to assist in the targeted management of TCG, increase NTGVVP patch connectivity, and overall diversity:

- **Strategic burning**, conducted by an experienced bushland contractor with expertise in managing native grasslands, should be conducted in April in mapped areas of *Partial extent* and NTGVVP, with an emphasis on the perimeters of patches. **These areas are a priority for future management.** The intent behind this type of management is to strategically reduce biomass and enhance areas that:
 - Already have remnants of NTGVVP grassland, but they are too patchy to meet the condition requirements.
 - OR
 - Have significantly declined in area over the past 9 years due to TCG encroachment.

The timing of burns should ensure that burns occur:

- Outside the active period of Striped Legless Lizards (SLL active period: Spring – Summer) and conducted as patchy, low intensity burns, and

- If burning is to occur in a population of Spiny Rice Flower, then it is to be sensitive to that species' burning requirements; see Spiny Rice Flower Targeted Survey letter report (Nature Advisory 2025).
- **Immediate herbicide control post-fire**. Prescribed burning alone will not reduce the extent of TCG. Follow-up treatments with herbicide application of newly germinated TCG will be needed and are more effective immediately postburn. *Phalaris aquatica* tends to germinate in mass and before native grassland species, so target seedlings are readily identifiable. Weed control post-burn should be conducted by an experienced bushland contractor with expertise identifying native grasses.
 - If burning is not viable and/or outside burn years, slashing within these areas prior to seeding will limit population spread and reduce biomass, increasing germination probability for native grassland species. The use of slashing should be minimised during the SLL active period (spring - summer), and if required should occur during the afternoon when SLL are faster moving).
- **Maintain weed control of other high threat weeds**, these include Serrated Tussock (*Nassella trichotoma*), Spear Thistle (*Cirsium vulgare*), Texas Needle-grass (*Nassella leucotricha*), and Artichoke Thistle (*Cynara cardunculus*).
- **Direct seeding** of suitable indigenous species is recommended to improve diversity and increase overall grassland quality, this is recommended to be conducted following reduction of TCG within existing NTGVVP patches to improve condition scores and also between nearby adjacent patches to improve connectivity between patches.

It should be noted that these recommendations are expected to require additional management in following years in order to be effective, as Toowoomba Canary-grass and other high-threat weeds will generally return to the treated site within a year if management is not continuous.

Yours sincerely,

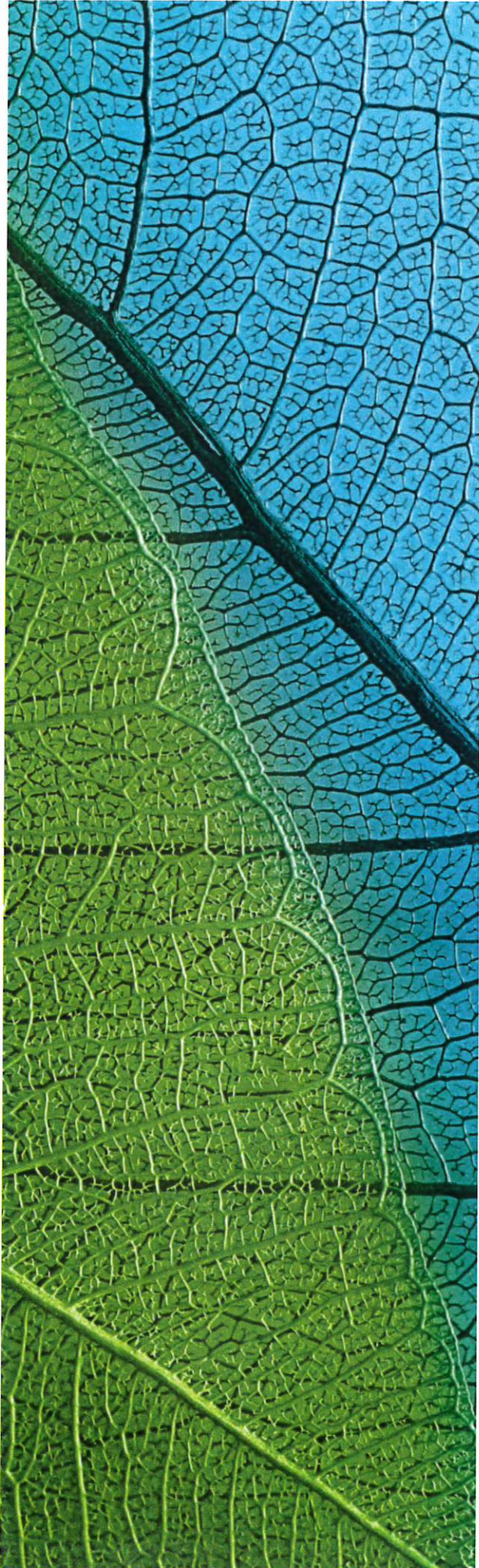
Suzie Moss

Botanist and Project Manager
Nature Advisory Pty Ltd

(03) 9815 2111 | Suzie@natureadvisory.com.au

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.
- Department of the Environment, Water, Heritage and the Arts (DEWHA) 2008, Commonwealth Listing Advice on Natural Temperate Grassland of the Victorian Volcanic Plain (Threatened Species Scientific Committee), Department of the Environment, Water, Heritage and the Arts, 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.
- DSE 2004a, *Ecological Vegetation Class (EVC) Benchmarks by Bioregion*, Department of Sustainability and Environment (DSE), now Department of Energy, Environment and Climate Action (DEECA), East Melbourne.
- Nature Advisory 2020, *Burnside Hub Activity Centre: Year 4 Rokewood Offset Site Surveys, Letter Report No. 14094.10*, Nature Advisory Pty Ltd, Hawthorn, Victoria.
- Parkes D, Newell G AND Cheal D 2003, Assessing the Quality of Native Vegetation: The 'habitat hectares' approach, *Ecological Management and Restoration* 4:29 – 38.



Karabeal & Rokewood Offsets at 1541 Rokewood-Shelford Road, Rokewood

Striped Legless Lizard Assessment

Prepared for MG Pastoral
Pty Ltd

December 2025
Report No. 22192.04 (0.1)



Nature
Advisory

5/61-63 Camberwell Road
Hawthorn East, VIC 3123
PO Box 337, Camberwell VIC 3124
(03) 9815 2111
www.natureadvisory.com.au

Nature Advisory acknowledges the traditional and sovereign custodians of the land on which we work from – the Wurundjeri people of the Woi Wurrung language group. We extend our respect to their Ancestors and all First Peoples and Elders, past, and present.

Executive summary

MG Pastoral Pty Ltd engaged Nature Advisory Pty Ltd to conduct an assessment of the Striped Legless Lizard *Delma impar* (SLL) at 1541 Rokewood-Shelford Road, Rokewood (the 'study area'). This is the site containing 78.58ha of offset area for Striped Legless Lizard, Spiny Rice Flower *Pimelea spinescens* (SRF) and Natural Temperate Grassland of the Victorian Volcanic Plains (NTGVVP).

The current investigation satisfies the requirement under the Offset Management Plan (OMP) (Brett Lane and Associates (BL&A) 2015) to conduct targeted surveys for SLL during the OMP management period at Year 4 and Year 7. Year 4 surveys were conducted by Nature Advisory in 2020, the second survey, satisfying the Year 7 requirement, are detailed in this report and were completed in 2025 (Year 9). This assessment also seeks to provide updated information on SLL occurrence and its population extent at the site to determine progress toward the following outcomes required under Condition 2 of the EPBC Act approval, by Year 10 (2026) from the date of approval:

- There must be at least 22.1 hectares of Striped Legless Lizard habitat with a quality score of at least 7.

SLL Monitoring

The intended purpose for this assessment is to monitor the population of SLL and the effectiveness of the offset site as habitat for the SLL.

The current offset site contains SLL habitat of varying degrees of quality, with the best quality habitat located in the north-east of the study area. These habitats contain varied abundances of basalt rock cover, bare ground and tussock forming grasses.

Majority of historical records of the SLL within a 10km search region were recorded by Nature Advisory zoologists on previous surveys.

During the field assessment, 5 SLLs were recorded in the study area. All SLL observations recorded during this investigation were within Tile Grid SLL1, in the north-east of the study area.

Conclusions and recommendations

As a habitat assessment of the entire offset area was beyond the scope of this targeted survey assessment, areas outside the identified survey grids were not thoroughly assessed. However, the results of the survey grid habitat assessments indicate that there appears to have been a slight decrease in the overall current extent of suitable habitat (due to the decline of Offset area B habitat) as well as a decline in the overall quality of habitat primarily due to weed invasion of Toowoomba Canary-grass. Therefore, at Year 9 from the approval date, the extent of SLL habitat within the offset site appears to be on a **negative trajectory toward meeting the approval condition requirement to maintain the extent of SLL habitat**, and also on a **negative trajectory towards increasing its initial quality from 6 out of 10 to 7 out of 10** by the end of year 10 (2026) from the approval date.

It is expected that the required 22.1 hectares of Striped Legless Lizard habitat is still present currently within the offset area, however, it appears to be declining and is not expected to meet the quality score requirement of at least 7 currently. Additional adaptive management is required in order to improve the quality of SLL habitat in order to meet the full requirements of Condition 7.

In addition to continuing the current grassland management regime in accordance with the OMP additional measures are recommended to assist in achieving compliance with the EPBC

requirements. Recommended actions for improving SLL habitat areas to achieve compliance with Condition 7 include the following:

- Minimise disturbance of suitable SLL habitat where possible.
 - Limit access to SLL habitat areas during breeding/active seasons between August to January. I.e, restrict vehicular and livestock access around known and potential SLL habitat as well as restricting pedestrian access apart from for essential management in line with the OMP
 - Ensure that surface and/or embedded rocks and refuge sites are retained
 - Implement additional grassland management/biomass management. Avoid burning sensitive habitat too frequently (< 3 years) and avoid burning in spring/early summer. Autumn burns and strategic grazing can be conducted to reduce biomass if necessary, however much of the existing biomass comprises Toowoomba Canary-grass which appears is not being effectively reduced by the current strategic grazing regime. As such, targeted burning of dense Toowoomba Canary-grass at appropriate times outside the SLL active period and sensitive to Spiny Rice-flower requirements where adjacent to Spiny Rice-flower, followed up with intensive weed control or alternatively slashing prior to seed set is recommended. The use of slashing should be minimised during the SLL active period (spring - summer), and if required should occur during the afternoon when SLL are faster moving).
- Prevent fragmentation and isolation of populations, where possible
 - Improve the quality of areas adjacent and connecting SLL habitat as it is likely to improve both the quality and area of SLL habitat currently present. Recommended measures include:

Increased weed control, focusing on high-threat species such as Toowoomba Canary-grass as well as ongoing control of other high-threat species present including Serrated Tussock, Spear Thistle and Cane Needle-grass.

Direct seeding to improve native species cover.
- Reduce the impacts of invasive plants and animals.
 - Clean vehicles and machinery passing through SLL habitat to minimise weed dispersal
 - Avoid introducing weeds or other non-indigenous plants
 - Reduce weed cover, taking care to avoid using herbicides on native vegetation, ensure engaged weed contractor is experienced in identifying native grasses

Contents

Executive summary	ii
1 Introduction	1
1 Striped Legless Lizard biology.....	2
1.1 Description.....	2
1.2 Habitat.....	2
1.3 Threats	3
1.4 Legislative protection	3
2 Methods	4
2.1 Existing information.....	4
2.2 Field methods	4
2.2.1 Habitat assessment	4
2.2.2 Tile grid targeted survey.....	4
2.3 Limitations	5
3 Results.....	7
3.1 Existing information.....	7
3.2 Habitat assessment	7
3.3 Field survey results.....	9
4 Conclusions and recommendations.....	13
References.....	15

Tables

Table 1: Assessment of SLL habitat at each survey site within the study area	8
Table 2: Results of the tile grid surveys	11

Figures

Figure 1: Photograph of a Striped Legless Lizard (Benjamint444; Licence: GFDL 1.2)	2
Figure 2: Study area and 2025 tile grid survey results.....	6
Figure 3: SLL VBA records within the search region	10

1 Introduction

MG Pastoral Pty Ltd engaged Nature Advisory Pty Ltd to conduct an assessment of the Striped Legless Lizard *Delma impar* (SLL) at 1541 Rokewood-Shelford Road, Rokewood (the 'study area'). This is the site containing 78.58ha of offset area for Striped Legless Lizard, Spiny Rice Flower *Pimelea spinescens* (SRF) and the Natural Temperate Grassland of the Victorian Volcanic Plains (NTGVVP).

The current investigation satisfies the requirement under the Offset Management Plan (OMP) (Brett Lane and Associates (BL&A) 2015) to conduct targeted surveys for SLL during the OMP management period at Year 4 and Year 7. Year 4 surveys were conducted by Nature Advisory in 2020, the second survey, satisfying the Year 7 requirement, are detailed in this report and were completed in 2025 (Year 9). This assessment also seeks to provide updated information on SLL occurrence and its population extent at the site to determine progress toward the following outcomes required under Condition 2 of the EPBC Act approval, by year 10 (2026) from the date of approval:

There must be at least 22.1 hectares of Striped Legless Lizard habitat with a quality score of at least 7.

The scope of the investigation included:

- A review of existing records of SLL sightings in databases such as the *Victorian Biodiversity Atlas*
- Field surveys of the study area during the September–December period, which involved:
 - A habitat assessment to identify potentially suitable SLL habitat within the study area
 - A tile grid survey to detect SLL presence

This investigation was undertaken by a team from Nature Advisory comprising Michael Sebastian (Zoologist), Rebecca Spence (Zoologist), Tara Cavallo (Zoologist), Maiten Lloyd (Zoologist), Emma Wagner (GIS Analyst), Amanda Dare (Senior Ecologist & Project Manager), and Suzie Moss (Senior Botanist & Project Manager).

1 Striped Legless Lizard biology

1.1 Description

The Striped Legless Lizard (SLL) belongs to the Pygopodidae family, which comprises legless or flap-footed lizard species (Robertson and Coventry 2019). The distinct features of SLLs include visible ear openings, a rounded tongue and scaly hind-limb flaps.

The colour and patterning of the SLL can vary considerably. It typically has a pale grey-brown colour on the dorsal (upper) surface and cream on the ventral surface (Figure 1). Prominent dark-brown or black stripes run the length of the body and transition into rows of spots on the tail (Robertson and Coventry 2019). In certain individuals in northern Victoria, the striped pattern may be reduced or almost absent. The lizard is moderately stout, comparable in thickness to a pencil, and can reach a length of approximately 30 cm, comprising a snout-vent length of 12 cm and a tail of 18 cm (Robertson and Coventry 2019).



Figure 1: Photograph of a Striped Legless Lizard (Benjamint444; Licence: GFDL 1.2)

The SLL is most active in the warmer months of mid-September to mid-May, with breeding most likely in the first half of this timeframe. Being ectothermic, SLLs need warmth from the sun, both direct and indirect (substrate warmth).

1.2 Habitat

The SLL inhabits dense native grasslands, often with rocky rises, and was once widespread on the volcanic plains west of Melbourne (TSSC 2016). It seeks shelter under rocks and in soil cracks, burrows and grass tussocks. Additionally, SLLs can be found in grasslands dominated by introduced species and in secondary grasslands near native grasslands (TSSC 2016).

1.3 Threats

The main threats to the species are habitat loss, modification, degradation and fragmentation caused by urban development, high-intensity grazing, inappropriate fire regimes and rock collection (DSEWPac 2011). In addition, by outcompeting natural vegetation, exotic grasses degrade SLL habitat by changing its structure, removing basking sites and increasing fire intensity. Feral predators (cats and foxes) are also suspected to contribute to the decline of the SLL (TSSC 2016).

1.4 Legislative protection

The SLL is listed as Vulnerable under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth; EPBC Act) and as Endangered under the *Flora and Fauna Guarantee Act 1988* (Vic; FFG Act; DEECA 2023).

2 Methods

2.1 Existing information

Previous records of SLL sightings were obtained from the *Victorian Biodiversity Atlas* (VBA), a public database administered by the Department of the Environment, Energy and Climate Action (DEECA) (DEECA 2025). These records were obtained for a 'search region', which was defined as the area within 10 km of the study area boundary.

2.2 Field methods

2.2.1 Habitat assessment

A habitat assessment was conducted on 28 August 2025 to determine areas of suitable SLL habitat within the study area. Suitable habitat consists of native grassland with an undisturbed soil profile. Habitat was described in terms of relative cover of tussock grasses/bare ground/herbs, presence of rocks and cracking soils.

2.2.2 Tile grid targeted survey

Surveys for SLLs were undertaken in accordance with the survey guidelines outlined in the *Environmental Protection and Biodiversity Conservation Act 1999—Referral Guidelines for the Vulnerable Striped Legless Lizard*, *Delma impar* (DSEWPaC 2011) and the *Victorian Biodiversity Precinct Structure Planning Kit* (DSE 2010). One SLL survey method is to place roofing tiles in areas of suitable habitat. These warm up in the sun, attracting SLLs seeking to gain warmth beneath them.

Five tile grids were set in areas of suitable habitat within the study area on 28th and 29th August 2025 (Figure 2). In each grid, 50 grooved terracotta roofing tiles were placed in a 20 × 45 m grid configuration, with the tiles spaced 5 m apart. The location of the north-west corners of the grid was recorded using a handheld GPS device. The tile grids were left in place for 38 days to allow SLLs to discover and habituate to them.

The tile grid surveys were undertaken in spring to early summer (October to early December), since SLLs are unlikely to use tiles in cold weather. A zoologist checked under each tile every 1–2 weeks to search for SLLs. A total of seven replicate tile checks was conducted, totalling a standardised survey effort of 1,750 *tile-checks* (i.e., number of checks × number of tiles).

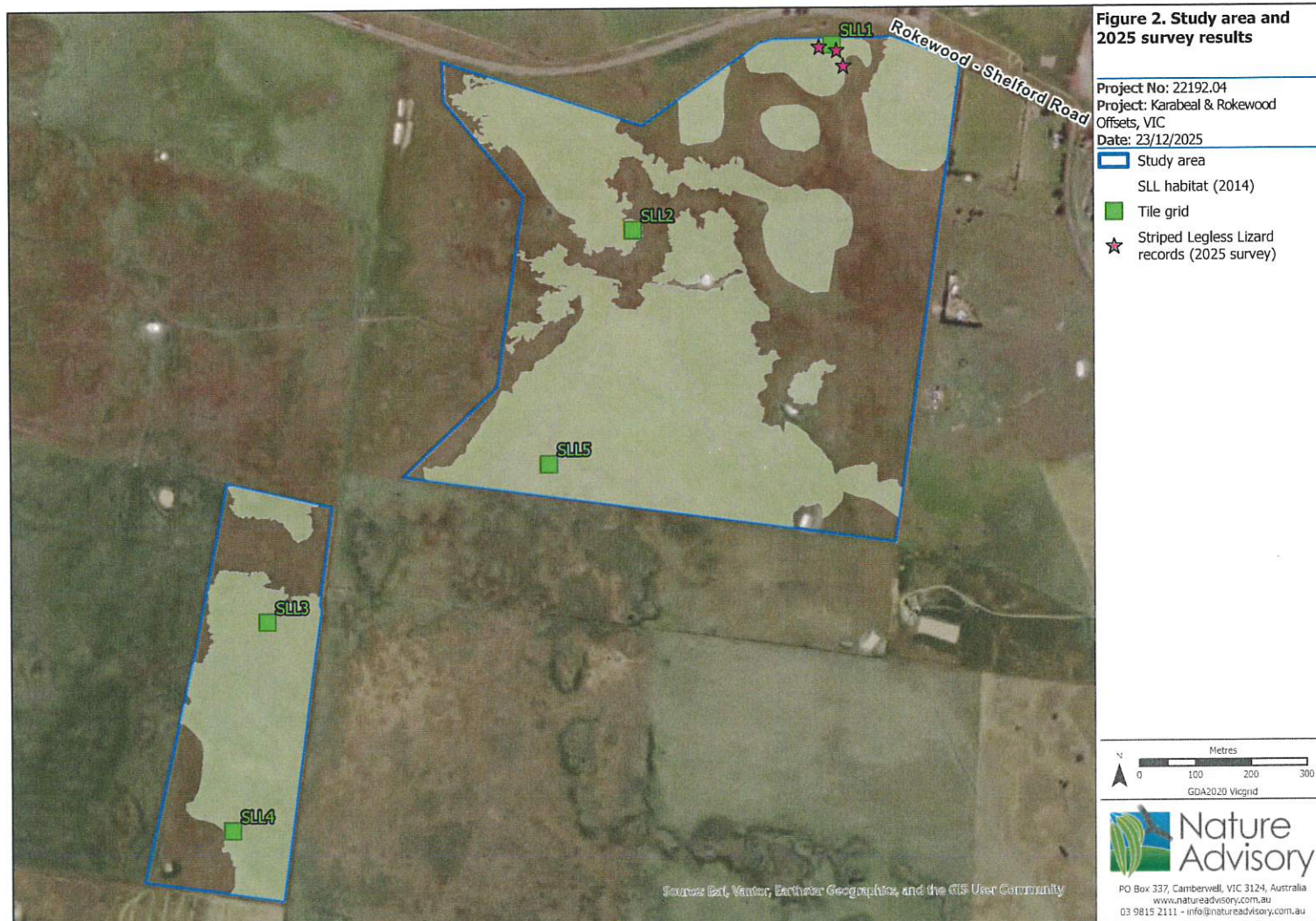
At each inspection of a tile grid, all 50 tiles were turned over to search for SLLs. Species of small mammals, reptiles and frogs were also recorded. All threatened species locations were marked using ArcGIS Field Maps® (Esri) on a hand-held device.

The surveys were conducted under weather conditions considered suitable for detecting SLLs; that is, when they were likely to thermoregulate under the tiles. At the beginning of each tile grid check, the temperature and humidity were measured in the ambient and under a sample tile. Tile checking was not performed at under-tile temperatures > 25 °C, as under these hotter conditions, SLLs are more likely to be foraging than thermoregulating.

2.3 Limitations

The survey timing and duration, and the weather conditions under which surveys were undertaken, were considered suitable for detecting SLLs.

The overall survey effort (1,750 tile-checks) was considered sufficient for detecting SLLs in the study area.



3 Results

3.1 Existing information

The VBA search found 61 records of SLLs within the search region (Figure 3). Most records are relatively recent (from 2014 onwards) and were collected by Nature Advisory zoologists for previous surveys within the property boundary. The remaining 21 records are relatively old (1992–2008). The study area is surrounded by farmland containing livestock and crops, with patches of grasslands throughout. The closest area of native grassland is approximately 0.2 km from the study area, across the Rokewood-Shelford Road, to the north.

3.2 Habitat assessment

All habitat within the study area is currently used for grazing livestock. The neighbouring properties also have agricultural uses, with occasional grassland habitat patches. There is limited connectivity between these grassland sites, with Rokewood-Shelford Road dividing the closest grassland habitats to the north with the study area.

The grassland habitat containing Tile Grid SLL1 comprised a mix of native and exotic grasses including native Kangaroo Grass *Themeda triandra*, and exotic Small quaking grass *Briza minor*, Wild Oat *Avena* sp. and Yorkshire fog *Holcus lanata*. This habitat had a slight gradient with north facing aspect, and moderately abundant basalt rock cover, providing optimal basking locations. Bare ground and small depressions across Tile Grid SLL1 were also moderately abundant. This tile grid location was situated in the best quality habitat within the study area.

The grassland habitat containing Tile Grid SLL2 was situated on a small rise with similar bare ground and rock cover abundances as Tile Grid SLL1. This habitat also comprised the same grassland species and contained one exotic shrub to the south-east of the tile grid.

Tile Grid SLL3 was located in the southern portion of the study area. Habitat within this tile grid was almost completely covered by pasture grasses, dominated by Toowoomba Canary-grass *Phalaris aquatica*. There was little bare ground and some rock cover across this relatively flat habitat. However, the abundant dead plant matter formed an insulating layer above the soil surface providing alternative refuge for small invertebrates and reptile species.

Tile Grid SLL4 was the most southern tile grid within the study area, situated just south of a rise. Habitat within this tile grid was dominated by Toowoomba Canary-grass *Phalaris aquatica*, with occasional Small quaking grass *Briza minor*. There was some bare ground and rock cover across the relatively flat habitat. However, the tussock forming grasses provided alternative refuge for small invertebrates and reptile species.

Tile Grid SLL5 was dominated by Chilean needlegrass *Nasella neesiana*, Yorkshire fog *Holcus lanata* with occasional Naked bluebell *Wahlenbergia gymnoclada* and Small quaking grass *Briza minor*. Due to the relatively flat topography, Tile Grid SLL5 was prone to holding more moisture in the soil than other Tile Grid locations. However, during dry periods, this habitat has high capacity for cracking soils providing potential refuge sites for the SLL. Within this habitat, there was limited bare ground but moderately abundant basaltic rock cover for basking. Additionally, the abundant tussock forming grasses provided alternative refuge for small invertebrates, amphibians and reptile species.

Areas of suitable SLL habitat from the initial assessment in 2014 are shown in Figure 2. The habitat characteristics are summarised in Table 1.

Table 1: Assessment of SLL habitat at each survey site within the study area

Survey site	Habitat variables	Description	Suitable habitat? (Y/N)
Tile Grid SLL1	Habitat type	Grassland with slight gradient (north facing aspect) and moderately abundant basalt rocks, bare ground and tussock forming grasses. Some natural depressions in the south of the tile grid holding moisture. This habitat is the best quality providing a range of refuge, basking and hunting structures.	Y
	Soil characteristics	Potential for cracking soils during dry periods.	
	Cover of overstorey	0%	
	Cover of understorey	70% (groundcover) 20% (basalt rock) 10% (bare ground)	
	Habitat disturbance/modification	This habitat is modified for agricultural purposes including planting exotic pasture grasses for grazing for livestock.	
	Connectivity	Less than 1km from other tile grids and nearby grassland across the Rokewood-Shelford Road.	
Tile Grid SLL2	Habitat type	Grassland on a small rise with moderately abundant basalt rocks, and tussock forming grasses. Some natural depressions in the south-east of the tile grid holding moisture. One exotic shrub present.	Y
	Soil characteristics	Potential for cracking soils during dry periods.	
	Cover of overstorey	5%	
	Cover of understorey	80% (groundcover) 10% (basalt rock) 5% (bare ground)	
	Habitat disturbance/modification	This habitat is modified for agricultural purposes including planting exotic pasture grasses for grazing for livestock.	
	Connectivity	Less than 1km from other tile grids and nearby grassland in neighbouring farmland properties.	
Tile Grid SLL3	Habitat type	Grassland with flat topography, moderately abundant basalt rocks, bare ground, and tussock forming grasses. Some natural depressions holding moisture.	Y
	Soil characteristics	Potential for cracking soils during dry periods. High moisture content and water holding in depressions during wet periods.	
	Cover of overstorey	0%	
	Cover of understorey	80% (groundcover) 15% (basalt rock) 5% (bare ground)	
	Habitat disturbance/modification	This habitat is modified for agricultural purposes including planting exotic pasture grasses for grazing for livestock.	
	Connectivity	Less than 1km from other tile grids and nearby grassland in neighbouring farmland properties.	

Survey site	Habitat variables	Description	Suitable habitat? (Y/N)
Tile Grid SLL4	Habitat type	Grassland with flat topography, minimal to no basalt rocks and bare ground. Dominated by exotic pasture grass <i>Phalaris aquatica</i> , with matting of dead plant matter on soil surface.	N*
	Soil characteristics	Limited potential for cracking soils during dry periods due to insulating dead plant matter layer.	
	Cover of overstorey	0%	
	Cover of understorey	95% (groundcover) 5% (bare ground)	
	Habitat disturbance/ modification	This habitat is modified for agricultural purposes including planting exotic pasture grasses for grazing for livestock. *This tile grid location was previously identified as suitable habitat despite it being identified as suboptimal during the 2025 assessment. However, as it was one of the only two grids that recorded SLL during the 2020 survey it was still determined to be an important tile grid site.	
	Connectivity	Less than 1km from other tile grids and nearby grassland in neighbouring farmland properties.	
Tile Grid SLL5	Habitat type	Grassland with flat topography, possibly shaded by nearby rise. Some basalt rock cover and bare ground visible between tussock forming grasses and insulating dead plant matter.	Y
	Soil characteristics	Potential for cracking soils during dry periods.	
	Cover of overstorey	0%	
	Cover of understorey	85% (groundcover) 5% (basalt rock) 10% (bare ground)	
	Habitat disturbance/ modification	This habitat is modified for agricultural purposes including planting exotic pasture grasses for grazing for livestock.	
	Connectivity	Less than 1km from other tile grids and nearby grassland in neighbouring farmland properties.	

3.3 Field survey results

During the field assessment, 5 SLLs were recorded in the study area all located within Tile Grid SLL1. No other tile grids recorded SLL Three other species were also recorded within the study area, as listed below.

- Fat-tailed Dunnart (*Sminthopsis crassicaudata*)
- Little Whip Snake (*Suta flagellum*)
- Spotted Marsh Frog (*Limnodynastes tasmaniensis*)

The survey results are summarised in Table 2 and shown on Figure 2.

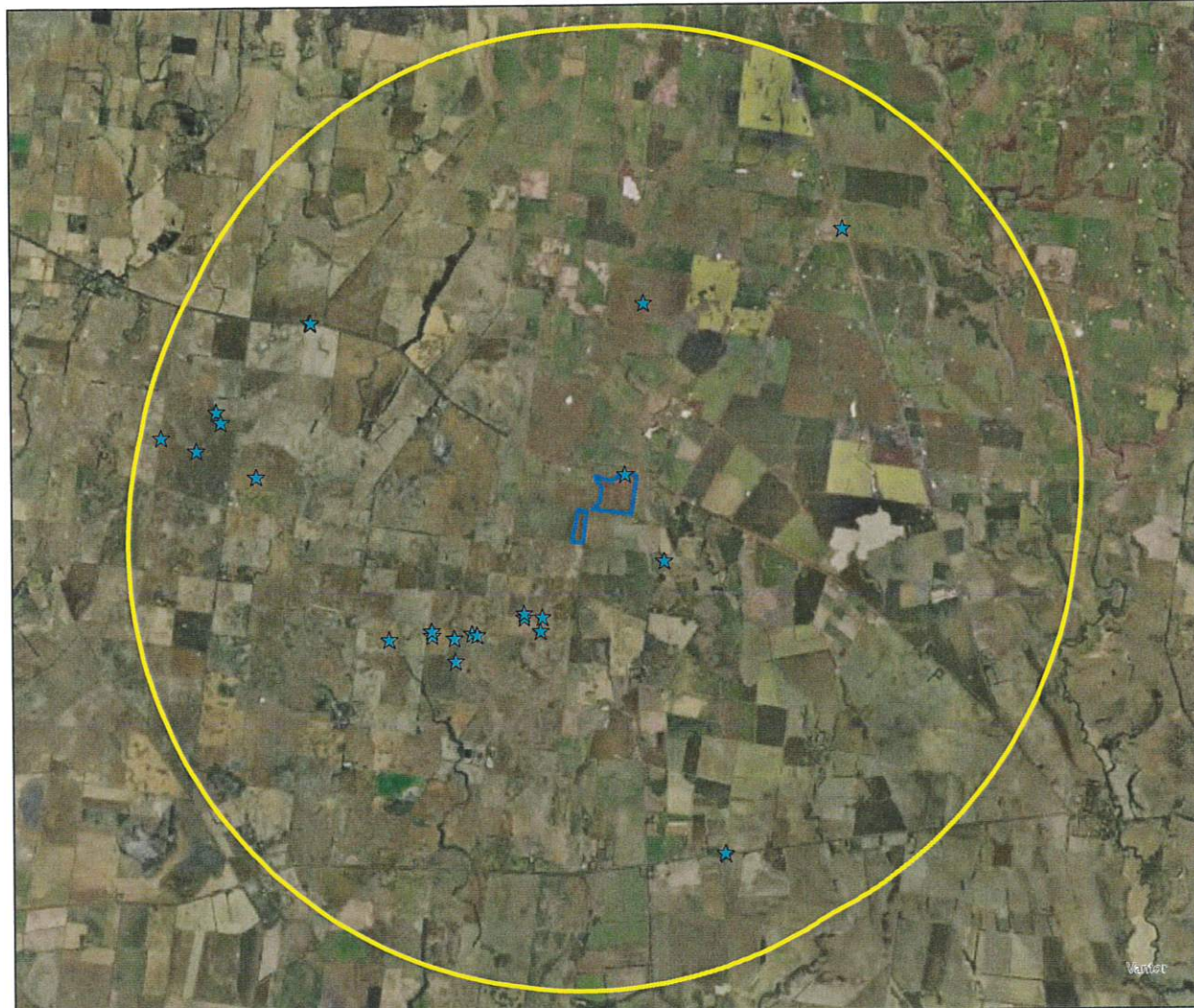
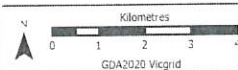


Figure 3. SLL VBA records within the search region

Project No: 22192.04
 Project: Karabeal & Rokewood
 Offsets, VIC
 Date: 23/12/2025

Study area
 Buffer - 10km
 SLL VBA records



 **Nature
Advisory**
 PO Box 337, Camberwell, VIC 3124, Australia
www.natureadvisory.com.au
 03 9815 2111 - info@natureadvisory.com.au

Table 2: Results of the tile grid surveys

Visit number	Date	Grid number	Time	Wind (direction/strength)	Cloud cover (%)	Rain	Temp ambient (°C)	Humidity ambient (%)	Temp sub-tile (°C)	Humidity sub-tile (%)	Species	Count
1	7/10/25	1	11.48	NW Moderate	50	None	18.12	42.4	19.43	81.93	Striped Legless Lizard (<i>Delma impar</i>)	2
		2	12.37								Spotted Marsh Frog (<i>Limnodynastes tasmaniensis</i>)	1
		3	12.50				16.13	49.43	19.2	66.91	Spotted Marsh Frog (<i>Limnodynastes tasmaniensis</i>)	1
		4	12.18				18.29	47.3	24.05	46.21	No species recorded	-
							18.3	42.03	24	52.37	No species recorded	-
		5	13.04				17.44	47.33	20.34	94.26	No species recorded	-
2	13/10/25	1	11.31	W Gentle	60	None	14.8	47.2	21.19	85.47	Striped Legless Lizard (<i>Delma impar</i>)	1
		2	11.55				16.91	37.89	20.4	86.2	No species recorded	-
		3	12.55				16.98	40.34	21.24	87.77	No species recorded	-
		4	13.15				15.32	47.66	23.26	60.94	No species recorded	-
		5	12.20				16.16	43.38	26.2	44.78	No species recorded	-
3	21/10/25	1	9.27	N Gentle	40	None	16.56	54.3	17.26	79.95	Striped Legless Lizard (<i>Delma impar</i>)	1
		2	9.59				19.2	44.75	20.38	86.26	No species recorded	-
		3	9.56				16	53	18	58	No species recorded	-
		4	10.17				18.4	48.63	19	86.5	No species recorded	-
		5	10.22				19.32	47.77	20.56	84.99	No species recorded	-
4	31/10/25	1	9.31	W Gentle	100	None	18.01	59.92	18.2	89.62	No species recorded	-
		2	10.06				18.04	60.42	19.6	72.8	No species recorded	-
		3	11.22				18.31	60.27	19.22	59.72	Little Whip Snake (<i>Suta flagellum</i>)	1
		4	11.46				19.81	62.3	18.17	63.94	No species recorded	-
		5	10.34				20.39	55.14	19.67	82	No species recorded	-
5	5/11/25	1	11.28	SW Fresh	90	Light	17.03	57.57	18.25	86.46	Spotted Marsh Frog (<i>Limnodynastes tasmaniensis</i>)	2
		2	11.53				15.77	61.47	17.17	81.64	Spotted Marsh Frog (<i>Limnodynastes tasmaniensis</i>)	2
		3	12.10				20.83	50.99	21.01	62.7	Little Whip Snake (<i>Suta flagellum</i>)	1
		4	11.55				17.19	55.74	20.52	86	No species recorded	-
		5	12.19				16.69	53.84	19.35	87.93	Spotted Marsh Frog (<i>Limnodynastes tasmaniensis</i>)	1
6	18/11/25	1	10.02	W Fresh	100	Moderate	16.07	72.98	17.9	87.05	Fat-tailed Dunnart (<i>Sminthopsis crassicaudata</i>)	1
		2	10.30				16.6	75.82	17.79	88.75	Spotted Marsh Frog (<i>Limnodynastes tasmaniensis</i>)	2
		3	11.33				20	61.8	19.76	77.53	Spotted Marsh Frog (<i>Limnodynastes tasmaniensis</i>)	3
		4	12.04				21.09	57.19	23.19	65.71	Little Whip Snake (<i>Suta flagellum</i>)	1
		5	10.55				17.45	73.72	18.77	90.76	No species recorded	-
7	2/12/25	1	11.39	W Gentle	50	None	16.83	50.61	18.14	87.79	Spotted Marsh Frog (<i>Limnodynastes tasmaniensis</i>)	2
											Fat-tailed Dunnart (<i>Sminthopsis crassicaudata</i>)	3
											Little Whip Snake (<i>Suta flagellum</i>)	1
		2	12.18				16.47	55	18.98	90.87	Striped Legless Lizard (<i>Delma impar</i>)	1*
											Spotted Marsh Frog (<i>Limnodynastes tasmaniensis</i>)	2

1541 Rokewood-Sheffield Road, Rokewood - Striped Legless Lizard Assessment - Report No. 22192.04 (0.1)

Visit number	Date	Grid number	Time	Wind (direction/strength)	Cloud cover (%)	Rain	Temp ambient (°C)	Humidity ambient (%)	Temp sub-tile (°C)	Humidity sub-tile (%)	Species	Count
		3	12:07				15.5	57.4	18.9	60.5	No species recorded	-
		4	12:38				16.5	50.8	23.5	60.4	No species recorded	-
		5	12:45				18.54	50.99	20.32	89.46	Spotted Marsh Frog (<i>Limnodynastes tasmaniensis</i>)	2

*Please note the record of SLL with an asterisks next to the count refers to a record found at Tile Grid SLL1 after the tile check at approximately 2:30pm.

Records highlighted in grey indicate the species is listed under legislation

4 Conclusions and recommendations

Offset areas of suitable SLL habitat are to be retained and, where possible, enhanced to meet approval conditions. Additionally, areas providing connectivity between SLL habitats should be retained and enhanced where possible. This species has previously been recorded in the northern-eastern section of the property (Offset Site A) and this current survey confirms that a population still exists in this area. SLL has also been confirmed previously as occurring in the southern section of the site (Offset Site B), however it was not detected in this area during the 2025 survey. This species is a cryptic species and is often difficult to detect at a site, the initial survey in 2014 also only detected SLL within the Tile Grid SLL1 area and as such these results are not inconsistent with initial surveys. It is assumed that the Striped Legless Lizard is also likely to occur in other areas of suitable habitat in the study area despite failure to detect the species in these areas.

The 2025 survey has seen a slight decline in the quality of suitable habitat within the offset area. Tile Grid SLL4 was located within areas originally mapped as high quality SLL habitat during the 2014 survey and SLL were detected at Tile Grid SLL4 in the 2020 survey. This habitat appears to have declined in quality during the 2025 survey and appears to be suboptimal habitat currently. Due to presence of SLL during the 2020 survey Tile Grid SLL4 was included during the 2025 assessment. The decline of SLL habitat in Offset Area B (Tile Grid SLL4) appears to be primarily due to the high cover of Toowoomba Canary-grass and high biomass from accumulation of Toowoomba Canary-grass thatch on the soil surface limiting bare ground. Similarly, Tile Grid SLL5 which was originally included in areas mapped as high quality SLL habitat in 2014 appeared to have declined in habitat, this grid was included in the 2025 survey in an attempt to survey additional areas previously mapped as high quality.

As a habitat assessment of the entire offset area was beyond the scope of this targeted survey assessment, areas outside the identified survey grids were not thoroughly assessed. However, the results of the survey grid habitat assessments indicate that there appears to have been a slight decrease in the overall current extent of suitable habitat as well as a decline in the overall quality of habitat. Therefore, at Year 9 from the approval date, the extent of SLL habitat within the offset site appears to be on a **negative trajectory toward meeting the approval condition requirement to maintain the extent of SLL habitat**, and also on a **negative trajectory towards increasing its quality from 6 out of 10 to 7 out of 10** by the end of year 10 (2026) from the approval date.

It is expected that the required 22.1 hectares of Striped Legless Lizard habitat is still present currently within the offset area, however, it appears to be declining and is not expected to meet the quality score requirement of at least 7 currently. Additional adaptive management is required in order to improve the quality of SLL habitat in order to meet the full requirements of Condition 7.

In addition to continuing the current grassland management regime in accordance with the OMP additional measures are recommended to assist in achieving compliance with the EPBC requirements. Recommended actions for improving SLL habitat areas to achieve compliance with Condition 7 include the following:

- Minimise disturbance of suitable SLL habitat where possible.
 - Limit access to SLL habitat areas during breeding/active seasons between August to January. I.e, restrict vehicular and livestock access around known and potential SLL habitat as well as restricting pedestrian access apart from for essential management in line with the OMP

- Ensure that surface and/or embedded rocks and refuge sites are retained
- Implement additional grassland management/biomass management. Avoid burning sensitive habitat too frequently (< 3 years) and avoid burning in spring/early summer. Autumn burns and strategic grazing can be conducted to reduce biomass if necessary, however much of the existing biomass comprises Toowoomba Canary-grass which appears is not being effectively reduced by the current strategic grazing regime. As such, targeted burning of dense Toowoomba Canary-grass at appropriate times outside the SLL active period and sensitive to Spiny Rice-flower requirements where adjacent to Spiny Rice-flower, followed up with intensive weed control or alternatively slashing prior to seed set. The use of slashing should be minimised during the SLL active period (spring - summer), and if required should occur during the afternoon when SLL are faster moving).

Prevent fragmentation and isolation of populations, where possible

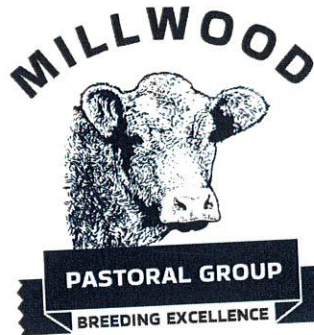
- Improve the quality of areas adjacent and connecting SLL habitat as it is likely to improve both the quality and area of SLL habitat currently present. Recommended measures include:
 - Increased weed control, focusing on high-threat species such as Toowoomba Canary-grass as well as ongoing control of other high-threat species present including Serrated Tussock, Spear Thistle and Cane Needle-grass.
- Direct seeding to improve native species cover.

Reduce the impacts of invasive plants and animals.

- Clean vehicles and machinery passing through SLL habitat to minimise weed dispersal
- Avoid introducing weeds or other non-indigenous plants
- Reduce weed cover, taking care to avoid using herbicides on native vegetation, ensure engaged weed contractor is experienced in identifying native grasses

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)*, consultants report prepared for Dennis Family Corporation Pty Ltd by Brett Lane and Associates Pty Ltd, Hawthorn East, Victoria.
- DEECA 2023, *Flora and Fauna Guarantee Act 1988 Threatened List*. Department of Energy, Environment and Climate Action, East Melbourne, Victoria.
- DEECA 2025, *Victorian Biodiversity Atlas 3.2.5*, Department of Energy, Environment and Climate Action, East Melbourne, Victoria, viewed 18 December 2025.
- DoE 2013, *Matters of National Environmental Significance – Significant Impact Guidelines 1.1* Department of the Environment, Canberra.
- DSE 2010, *Biodiversity Precinct Structure Planning Kit*, Department of Sustainability and Environment, East Melbourne.
- DSEWPac 2011, *Environment Protection and Biodiversity Conservation Act 1999 – Referral Guidelines for the Vulnerable Striped Legless Lizard, Delma impar – EPBC Act Policy Statement 3.28*, Department of Sustainability, Environment, Water, Population and Communities, Canberra.
- Nature Advisory 2025, *Year 4 Rokewood Offset site surveys, Burnside Hub, Report No. 14094.10*, consultants report prepared for MG Pastoral Pty Ltd by Nature Advisory Pty Ltd, Hawthorn East, Victoria.
- Robertson P and Coventry A 2019, *Reptiles of Victoria: A Guide to Identification and Ecology*. CSIRO Publishing.
- TSSC 2016, *Conservation Advice Delma impar Striped Legless Lizard*. Threatened Species Scientific Committee, Canberra.



Land Owner of offset site : M.G. Pastoral Co. Pty. Ltd.

Location and address of offset site : 1541 Shelford Rokewood Rd. Rokewood, Vic.

Offset site number : EPBC 2011/6004

Offset plan ref. number : BL&A 14094 Feb. 2015

Responsible Authority : Dept. of The Environment.

Report No. : #5, April 14, '20 - April 14, '21

Signature:

Name : Marshall G. Dennis

Date : 10/11/25.

Millwood Farm Services Pty Ltd ABN 52 004 427 874
trading as Millwood Pastoral Group
Level 4, 863 High Street, ARMADALE VIC 3143
Telephone: (61) 3 8391 4420



Management Actions – EPBC 2011/6004

Year #5 April 14, 2020 – April 13, 2021.

‘Wandabar’ : 1531 Shelford Rokewood Rd. Rokewood Vic.

Access to inspect the property and NV plots were severely restricted in 2020 due to the Covid '19 Pandemic.

Melbourne was in a State Gov. directed lockdown (#2) from Thursday 9 July, 2020 to Tuesday 27 October, 2020.

The lockdown extended for 111 calendar days. The Gov. encouraged those that could work from home to do so. From Wed. 5th August, a hard lockdown was imposed, whereby only essential and permitted workers could leave work to attend work.

Our legal interpretation from the ‘Approved Worker / Permit’ schedule was that NV offset management onsite works were not an approved activity and therefore, representatives of MG Pastoral were not able to receive the required permits.

However, Nature Advisory undertook the targeted surveys for both Striped Legless Lizards and Spiny Rice Flowers in late August. See attached appendix 1.

Small Farm Contracting undertook noxious weed spot spraying for serrated tussock, in and around the SRF plat as well as the sth. east plot. See appendix 2 attached.

Fencing and gates were routinely inspected, both prior to and subsequent to the lockdowns. The inspections were undertaken by either a representative of MG Pastoral or a sub-contractor, Small Farm Contracting. Specifically, the integrity of the rabbit proof fence of the SRF plot in the nth. east corner, was a particular focus. There were no noticeable penetrations nor deficiencies with the integrity of the fence. The southern boundary fence remains in good stock proof condition.



Suite 5, 61-63 Camberwell Road, Hawthorn East 3123
PO Box 337, Camberwell VIC 3124
Ph: +61398152111 Fax: +61398152685
E-mail: info@natureadvisory.com.au
Website: www.natureadvisory.com.au

Burnside Commercial Pty Ltd
C/- Ranfurly Asset Management
Suite 2, 2-6 Glenferrie Rd,
MAVERN VIC 3144

Client Ref/Contact: Marshall Dennis

Re: Nature Advisory Project - 14094 - Burnside Hub

Appendix #1
Tax Invoice

A.B.N. 12 095 541 334

Invoice date: 30.09.2020

Invoice #: 516393

Invoice due date: 14 days

Project Manager: Brett Macdonald

Description	Service	Quantity	Rate	Total
Striped Legless Lizard (SLL) targeted survey (August - Dec 2020)				4 240.00
Tile grid set-up (4 grids) - August 2020	B. Macdonald	8:00 hour(s)	180.00	1 440.00
Tile grid set-up (4 grids) - August 2020	Zoologist	16:00 hour(s)	125.00	2 000.00
	Vehicle 50-100km	2 rate	180.00	360.00
2 people, one night	Food & Accommodation	2 rate	220.00	440.00
Subheading subtotal:				4 240.00
Spiny Rice-flower (SRF) targeted survey (August 2020)				4 680.00
field survey	B. Macdonald	16:00 hour(s)	180.00	2 880.00
field survey	Botanist	8:00 hour(s)	125.00	1 000.00
	Vehicle 50-100km	2 rate	180.00	360.00
2 people, one night	Food & Accommodation	2 rate	220.00	440.00
Subheading subtotal:				4 680.00

Terms: 14 days
Date Due: 14.10.2020

Sub Total (Ex GST): \$8 920.00
GST Amount: \$892.00
Total Inc GST: **\$9 812.00**
Amount Applied: \$0.00
Balance Due: \$9 812.00

Please cross-check entity name and bank account number prior to transferring funds. If you are advised of a bank account number change and/or the details differ to prior transfers please immediately contact Nature Advisory before paying this invoice on 03 9815 2111

Remittance Advice: Please attach this advice when posting payment. Thank you

Burnside Commercial Pty Ltd
C/- Ranfurly Asset Management
Suite 2, 2-6 Glenferrie Rd,
MAVERN VIC 3144

Please make cheques payable to:
Nature Advisory Pty Ltd

EFT Payment Details Are:

Invoice #: 516393
Balance Due: \$9 812.00

Date Due: 14.10.2020

BSB: 083 755 Account No: 526273388
Please use Invoice # as a reference
Email remittance to
accounts@natureadvisory.com.au

Appendix #2.

G. R. Hewitt trading as

Small Farm Contracting Pty Ltd

A.B.N.: 30 608 262 942

POSTAL ADDRESS:
P.O. BOX 61, LEOPOLD 3224

TRADING ADDRESS:
30 Como Road, LEOPOLD 3224

Tax Invoice

Ph: (03) 5250 1693
Mob: 0417 044 464
Fax: (03) 5250 2743

Online:
www.smallfarmcontracting.com.au
Email: grahamrhewitt@gmail.com

Bill To:

MG Pastoral Pty Ltd

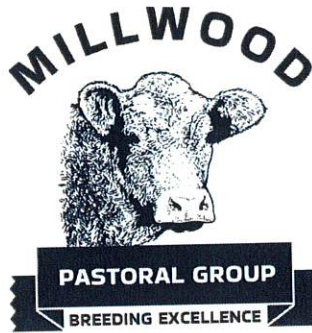
Invoice #: 00002633

Date: 11/09/2020

Page: 1

COMMERCIAL OPERATORS REGISTERED LICENCE NO. 126

DATE	DESCRIPTION	AMOUNT	CODE
28/08/2020	Weed review and control of Serrated Tussock at "Wyndamar", Shelford-Rokewood Road, services supplied by Small Farm Contracting team. Checked property for Serrated Tussock and located various areas: South-east corner, north-east corner, eastern end of the property and isolated plants on the west of the old house. 270 litres of chemical applied. Always committed to best practice and optimal outcomes, Small Farm Contracting were keen to find and eradicate these weeds and worked hard to do so. Kind regards, Graham Hewitt Manager	\$1,784.75	GST
Payment by Cheque to Postal Address or Electronic Funds Transfer (EFT) ***PLEASE NOTE: NEW BANK DETAILS BELOW***		GST:	\$162.25
EFT DETAILS: Account Name: Small Farm Contracting Bank: Bendigo Bank BSB: 633-108 ACCOUNT NUMBER 1559 - 95590		Total Inc GST:	\$1,784.75
		Amount Applied:	\$0.00
		Balance Due:	\$1,784.75



Land Owner of offset site : M.G. Pastoral Co. Pty. Ltd.

Location and address of offset site : 1541 Shelford Rokewood Rd. Rokewood, Vic.

Offset site number : EPBC 2011/6004

Offset plan ref. number : BL&A 14094 Feb. 2015

Responsible Authority : Dept. of The Environment.

Report No.: #6, April 14, '21 - April 14, '22.

Signature:

Name : Marshall G. Dennis

Date: 16/11/25.

Millwood Farm Services Pty Ltd ABN 52 004 427 874
trading as Millwood Pastoral Group
Level 4, 863 High Street, ARMADALE VIC 3143
Telephone: (61) 3 8391 4420



Management Actions – EPBC 2011/6004

Year # 6 April 14, 2021 – April 13, 2022.

‘Wandabar’ : 1531 Shelford Rokewood Rd. Rokewood Vic.

Access to inspect the property and NV plots continued to be restricted in 2021/'22 due to the ongoing Covid '19 Pandemic.

Melbourne was in a State Gov. directed lockdown (#3) from 13th Feb., 2021 to 17th Feb. 2021, totalling 5 calendar days.

Lockdown (#4) extended from Friday May 28 '21, to Thursday, 10 June '21, totalling 14 calendar days.

Lockdown (#5) extended from Friday 16 July, '21 to Tuesday 27 July '21, totalling 12 calendar days.

Lockdown (#6) extended from Thursday 5 August to Thursday 21 October, '21, totalling 77 calendar days.

The lockdown aggregated to a total of 103 calendar days during this reporting period, further frustrating inspections and activities on site.

With continued uncertainty regarding lockdowns it was impossible to plan and undertake onsite actions, considering the seasonal requirements for certain activities.

Small Farm Contracting undertook noxious weed spot spraying for serrated tussock, in and around the sth. east plot. See appendix ² attached.

The extent of volunteer phalaris, was becoming an issue. It was likely that a controlled burn would be required in the near future. We decided to allow sheep onto this plot for an extended period to reduce some biomass prior to the burn, attempting to create the right biomass conditions for a 'cold' burn. This would be undertaken in winter and early spring of '22. *Note: 3 x images of phalaris extent in sth East plot. Appendix 2, 3 & 4.*

Fencing and gates were routinely inspected, when able, complying with the various lockdowns. The inspections were undertaken by either a representative of MG Pastoral or a sub-contractor, Small Farm Contracting. Specifically, the integrity of the rabbit proof fence of the SRF plot in the nth. east corner, was a particular focus. Again, there were no noticeable penetrations nor deficiencies with the integrity of the fence. The southern boundary fence remains in good stock proof condition.

G. R. Hewitt trading as

Small Farm Contracting Pty Ltd

A.B.N.: 30 608 262 942

POSTAL ADDRESS:
P.O. BOX 61, LEOPOLD 3224

TRADING ADDRESS:
30 Como Road, LEOPOLD 3224

Tax Invoice

Ph: (03) 5250 1693
Mob: 0417 044 464
Fax: (03) 5250 2743

Online:
www.smallfarmcontracting.com.au
Email: grahamrhewitt@gmail.com

Bill To:

MG Pastoral Pty Ltd

Invoice #: 00002744

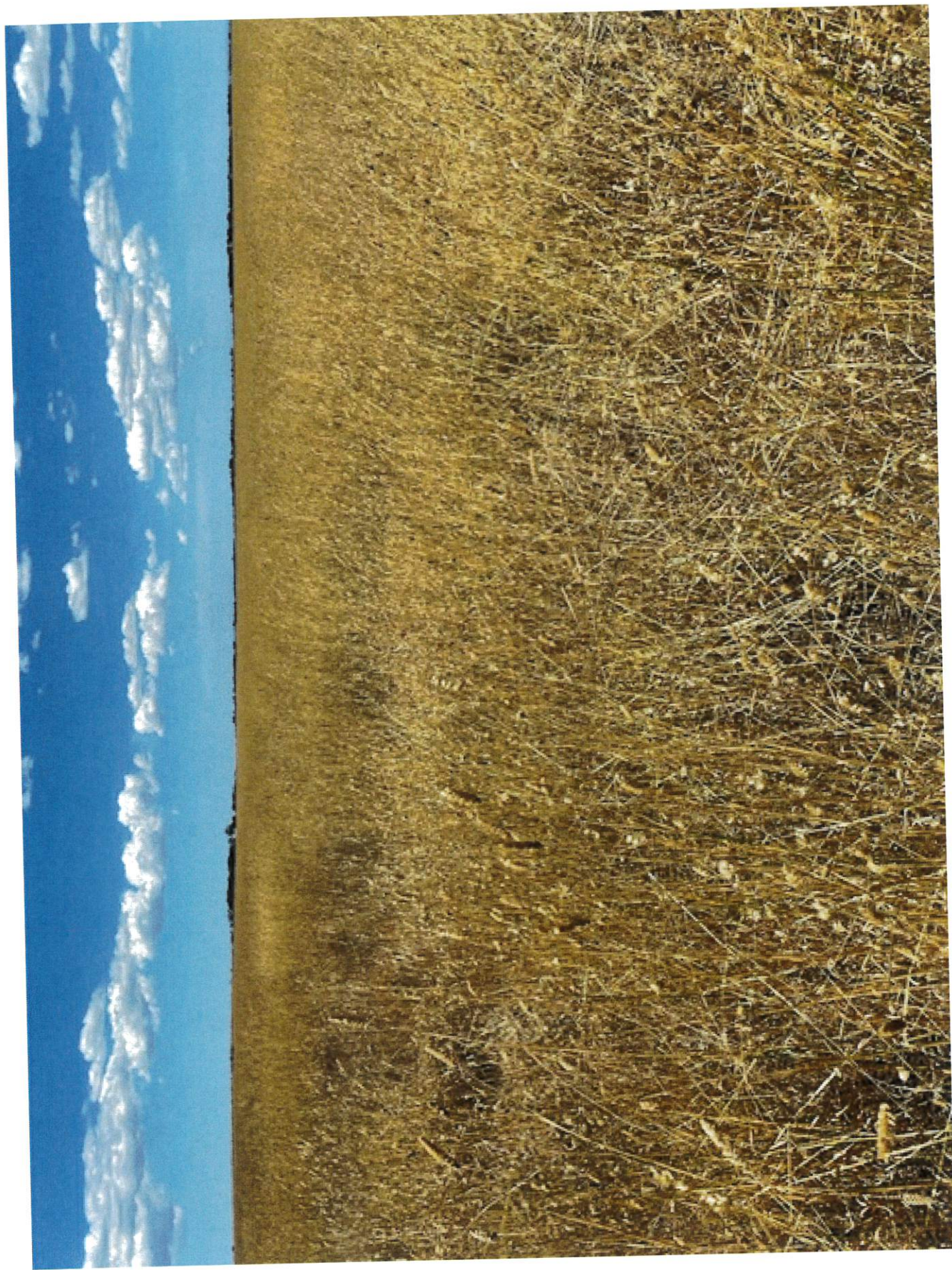
Date: 20/10/2021

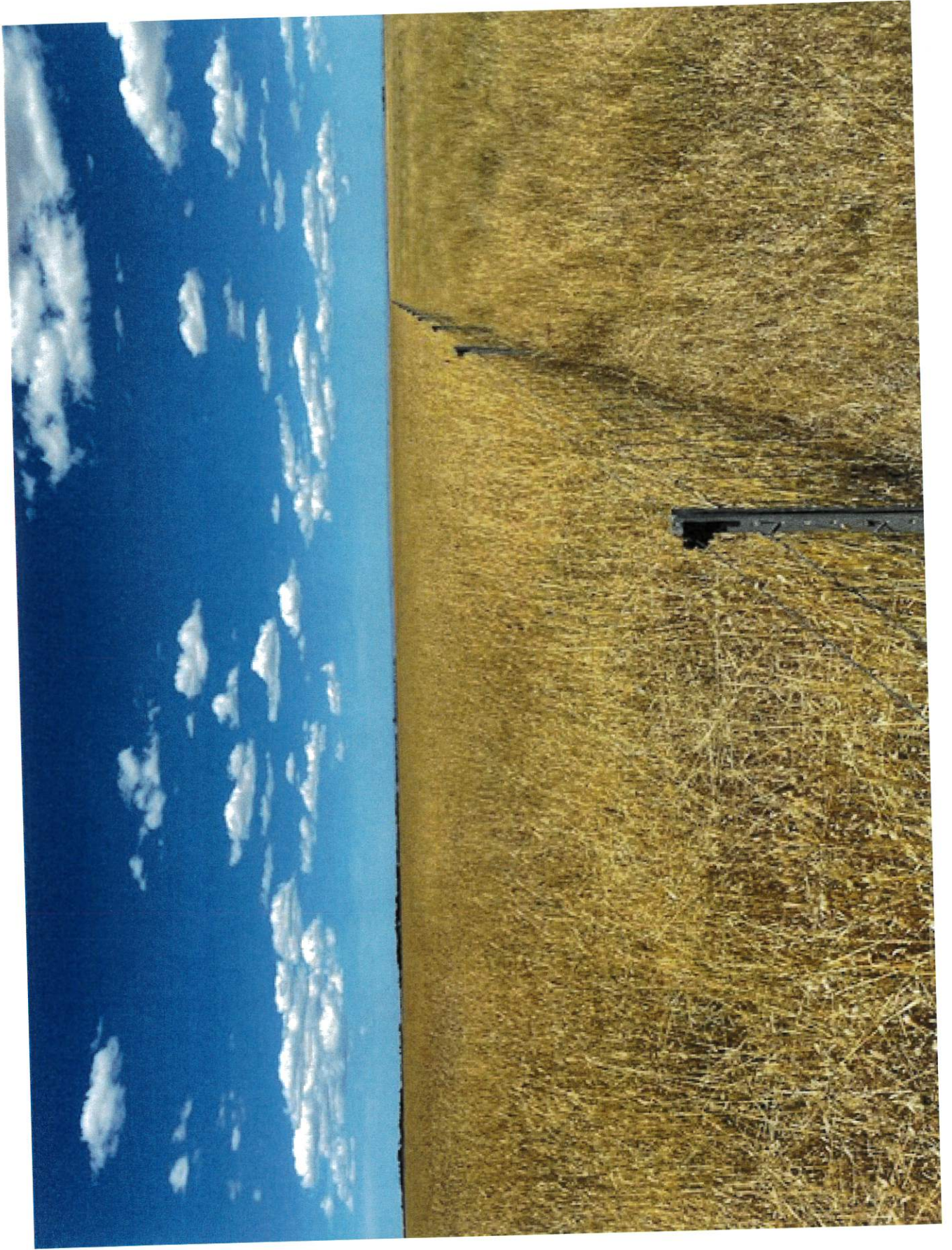
Page: 1

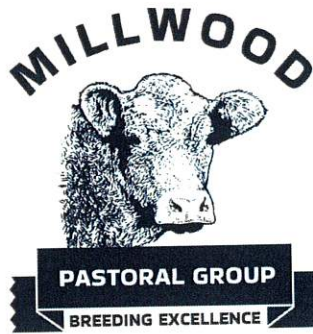
COMMERCIAL OPERATORS REGISTERED LICENCE NO. 126

DATE	DESCRIPTION	AMOUNT	CODE																		
18/10/2021	Commencement of Annual program of Serrated Tussock at "Carrimbar", <i>Wandabur</i>, Shelford-Rokewood Road. Work was undertaken with both spray-equipped Ranger Utes and 3x Polaris Spray Rigs. The most weed-infested areas were in the south-eastern corner of the property and west of sheds. We continue to enjoy providing our tailor-made services for the ongoing maintenance of " Carrimbar". Kind regards, Graham Hewitt Manager <table><tr><td>Authorised by:</td><td>M Dennis</td><td>Date:</td></tr><tr><td>Name</td><td>Marshall Dennis</td><td></td></tr><tr><td>Entity GL Bus. Grp:</td><td>041/8065/504</td><td></td></tr><tr><td>Job No:</td><td></td><td></td></tr><tr><td>Description:</td><td>Contractor/Wandabar</td><td></td></tr><tr><td>Amount Inc GST:</td><td>\$5,568.75</td><td></td></tr></table>	Authorised by:	M Dennis	Date:	Name	Marshall Dennis		Entity GL Bus. Grp:	041/8065/504		Job No:			Description:	Contractor/Wandabar		Amount Inc GST:	\$5,568.75		\$5,568.75	GST
Authorised by:	M Dennis	Date:																			
Name	Marshall Dennis																				
Entity GL Bus. Grp:	041/8065/504																				
Job No:																					
Description:	Contractor/Wandabar																				
Amount Inc GST:	\$5,568.75																				
Payment by Cheque to Postal Address or Electronic Funds Transfer (EFT) ***PLEASE NOTE: NEW BANK DETAILS BELOW***		GST:	\$506.25																		
EFT DETAILS:		Total Inc GST:	\$5,568.75																		
Account Name: Small Farm Contracting		Amount Applied:	\$0.00																		
Bank: Bendigo Bank		Balance Due:	\$5,568.75																		
BSB: 633-108																					
ACCOUNT NUMBER 1559 - 95590																					









Land Owner of offset site : M.G. Pastoral Co. Pty. Ltd.

Location and address of offset site : 1541 Shelford Rokewood Rd. Rokewood, Vic.

Offset site number : EPBC 2011/6004

Offset plan ref. number : BL&A 14094 Feb. 2015

Responsible Authority : Dept. of The Environment.

Report No. : #7, April 14/22 - April 13, '23.

Signature :

Name : Marshall G. Dennis

Date :

20/11/25.

Millwood Farm Services Pty Ltd ABN 52 004 427 874
trading as Millwood Pastoral Group
Level 4, 863 High Street, ARMADALE VIC 3143
Telephone: (61) 3 8391 4420



Management Actions – EPBC 2011/6004

Year # 7 April 14, 2022 – April 13, 2023.

‘Wandabar’ : 1531 Shelford Rokewood Rd. Rokewood Vic.

Vegetation was grazed by sheep in area A in early Sept.’22 for approx. 21 days. A longer than suggested time frame was deemed sensible due to the extent of vegetation cover and the number of sheep used for the grazing. With limited ability for access to water, the sheep had access to both the area A paddock and the adjoining paddocks to the west (outside of the offset zone). Consequently, ‘pulse grazing’ was not possible as per the recommendations of the OMP, however a suitable reduction of the biomass was achieved.

Nature Advisory visited the site in late 2022 to investigate the vegetation and provide some guided comments on forward actions, both short and medium term. Their advice is contained in their written report dated Feb. 1, 2023, is attached at appendix 1. Biomass burning was recommended for both areas A & B.

In early April 2023, Small Farm Contracting (SMF) prepared fire breaks around most of the SRF site, in the nth. east corner of the property, either by mowing or brush cutting. The firebreaks were created outside of the offset zones. SMF’s invoice is attached in appendix 2. Images of the slashed / mown firebreaks are attached at appendices 3,4, & 5.

Fencing and gates were routinely inspected, by either a representative of MG Pastoral or a sub-contractor, Small Farm Contracting. Specifically, the integrity of the rabbit proof fence of the SRF plot in the nth. east corner, was a particular focus. Again, there were no noticeable penetrations nor deficiencies with the integrity of the fence. The north and eastern sections of fencing of the southern plot remains in good stock proof condition. The eastern fence is in a serviceable condition.

During the year, our neighbour to the south requested that we re-fence our adjoining boundary fence, which we did. Consequently, in June ’22 the southern section of the southern plot (area B) was replaced with stock proof fence, Attached is the invoice for fencing at appendix 6.

1st February 2023

MG Pastoral

Attention: Marshall Dennis

By email – marshall.dennis@denniscorp.com.au

Dear Marshall,

**RE: ROKEWOOD OFFSET SITE
MANAGEMENT ADVICE
PROJECT NUMBER 22192.02**

The following outlines the findings of an overview audit of the condition of native vegetation, threats to biodiversity, and adaptive management actions recommended to be implemented in addition to those stipulated in the approved Offset Management Plan,

Rokewood

Site A – Condition

All zones dominated by Kangaroo Grass with Narrow Plantain and Blue Devil also common. Low herb diversity with limited inter-tussock spaces. Weed cover primarily due to high density of Toowoomba Canary-grass surrounding and intruding, with Onion Grass also prevalent. Easternmost regions of Zone 2, 12, 14 overrun with Toowoomba Canary-grass (dominant in adjacent paddock) and native vegetation extent reduced. Areas of NTGVVP still qualify.

Population of Spiny Rice-flower in Zone 20 very good. None detected in Zone 24 and 30. Areas designated as NTGVVP still qualify.

Table 1: Main native components of Rokewood Site A

Common name	Scientific name
Blue Devil	<i>Eryngium ovinum</i>
Bluebells	<i>Wahlenbergia</i> spp.
Crane's Bill	<i>Geranium</i> sp.
Kangaroo Grass	<i>Themeda triandra</i>
Lemon Beauty-heads	<i>Calocephalus citreus</i>
Narrow Plantain	<i>Plantago gaudichaudii</i>
Native Flax	<i>Linum marginale</i>
Prickfoot	<i>Eryngium vesiculosum</i>
Sheep's Burr	<i>Acaena</i> × <i>ovina</i>
Slender Speedwell	<i>Veronica gracilis</i>
Spear Grasses	<i>Austrostipa</i> spp.
Spiny Rice-flower	<i>Pimelea spinescens</i> subsp. <i>spinescens</i>

Common name	Scientific name
Tussock Grasses	<i>Poa</i> spp.
Wallaby Grasses	<i>Rytidosperma</i> spp.

Table 2: Main weed components of Rokewood Site A

Common name	Scientific name
Flatweed	<i>Hypochaeris radicata</i>
Onion Grass	<i>Romulea rosea</i>
Ox-tongue	<i>Helminthotheca echioides</i>
Small Quaking-grass	<i>Briza minor</i>
Spear Thistle	<i>Cirsium vulgare</i>
Toowoomba Canary-grass	<i>Phalaris aquatica</i>
Wild Oat	<i>Avena</i> sp.
Yorkshire Fog	<i>Holcus lanata</i>



Zone 20: Spiny Rice-flower with Narrow Plantain in dense biomass including Toowoomba Canary-grass and Onion Grass.



Zone 31: Very high cover of weeds including Toowoomba Canary-grass, Onion Grass and Flatweed.



Zone 40: Toowoomba Canary-grass and Onion Grass encroaching.

Site A – Recommendations: 1-year adaptive management actions

- Conduct controlled burn (mosaic for larger zones) in autumn to manage Toowoomba Canary-grass and reduce biomass in Zone 20, 24, 28, 31, 345, 36–38, 40 and 41. Spot spray individual Toowoomba Canary-grass carefully in other zones. Slash or burn surrounding areas of high Toowoomba Canary-grass infestation to create at least 20m buffer around zones.
- Follow up with careful spot spraying of emergent weeds, with particular attention to Flatweed, Ox-tongue and Spear Thistle.

- Treat for control of Onion Grass (with metsulfuron-methyl herbicide and an appropriate surfactant, using a wiping application method) in late winter/early spring, 6-8 weeks after emergence of growth from new corms. Treatment will be ineffective if applied too late (such as when the tips of leaves begin to show discoloration/browning from fungal infection).
- Pulse grazing with sheep in early to mid-spring to prevent seed set of annual introduced grasses.
- Ensure no grazing by sheep through summer to limit dispersal of Onion Grass seeds.

Site B – Condition

All zones dominated by Kangaroo Grass with Narrow Plantain and Blue Devil also common. Low herb diversity with limited inter-tussock spaces. Weed cover primarily due to high density of Toowoomba Canary-grass surrounding and intruding, with Onion Grass also over-abundant. Easternmost regions of Zone 2, 12, 14 overrun with Toowoomba Canary-grass (dominant in adjacent paddock) and native vegetation extent reduced. Most areas still qualify as NTGVVP.

Table 3: Main native components of Rokewood Site B

Common name	Scientific name
Blue Devil	<i>Eryngium ovinum</i>
Kangaroo Grass	<i>Themeda triandra</i>
Narrow Plantain	<i>Plantago gaudichaudii</i>
Sheep's Burr	<i>Acaena × ovina</i>
Sundew	<i>Drosera</i> sp.
Tussock Grasses	<i>Poa</i> spp.

Table 4: Main weed components of Rokewood Site B

Common name	Scientific name
Annual grasses	
Onion Grass	<i>Romulea rosea</i>
Rough Sow-thistle	<i>Sonchus aspera</i>
Small Quaking-grass	<i>Briza minor</i>
Toowoomba Canary-grass	<i>Phalaris aquatica</i>



Zone 14, dominated by Kangaroo Grass and Toowoomba Canary-grass, the latter also surrounding and encroaching. Onion Grass cover also high.

Site B – Recommendations: 1-year adaptive management actions

- Conduct controlled burn in autumn to manage Toowoomba Canary-grass. Surrounding vegetation should also be created and maintained by slashing or burning to create a buffer of at least 20 metres so that ongoing re-infestation is reduced.
- Follow up with careful spot spraying of emergent weeds.
- Treat for control of Onion Grass (with metsulfuron-methyl herbicide and an appropriate surfactant, using a wiping application method) in late winter/early spring, 6–8 weeks after emergence of growth from new corms. Treatment will be ineffective if applied too late (such as when the tips of leaves begin to show discoloration/browning from fungal infection).
- No grazing.

I trust the above provides suitable initial guidance for remedial actions for the next year, after which time a more thorough assessment should be undertaken. Please contact me if you have any questions or comments.

Yours sincerely,

Chris Dunk

**Senior Ecologist & Project Manager
Nature Advisory Pty Ltd**

(03) 9815 2111 | chris@natureadvisory.com.au

Appendix #2

G. R. Hewitt trading as

Small Farm Contracting Pty Ltd

A.B.N.: 30 608 262 942

POSTAL ADDRESS:
P.O. BOX 61, LEOPOLD 3224

TRADING ADDRESS:
30 Como Road, LEOPOLD 3224

Tax Invoice

Ph: (03) 5250 1693
Mob: 0417 044 464
Fax: (03) 5250 2743

Online:
www.smallfarmcontracting.com.au
Email: grahamrhewitt@gmail.com

Bill To:

MG Pastoral Co.Pty Ltd DFC#041
Level 4,
863 High Street
Armadale Vic 3143

Invoice #: 00002872
Date: 24/04/2023

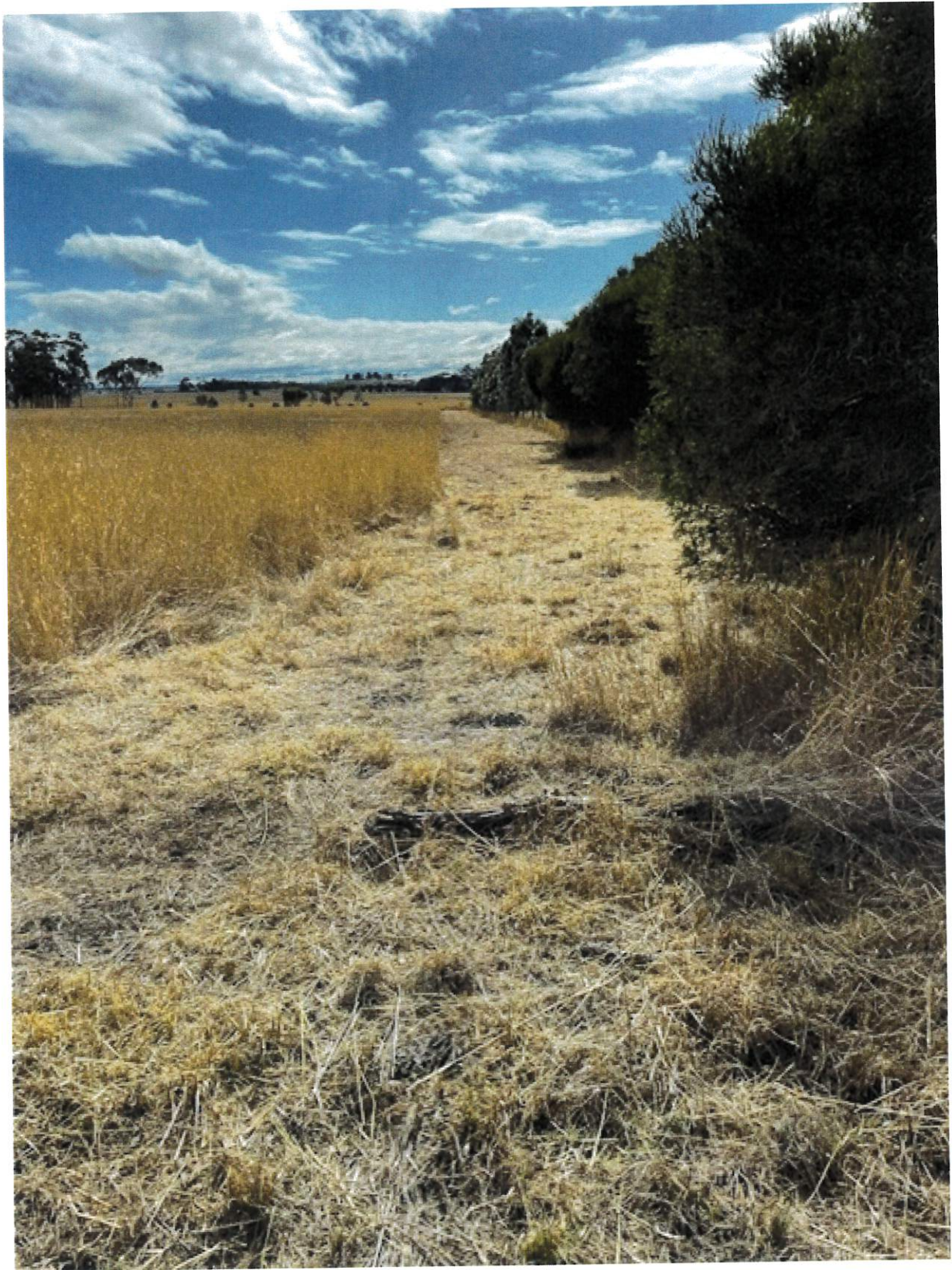
Page: 1

COMMERCIAL OPERATORS REGISTERED LICENCE NO. 126

DATE	DESCRIPTION	AMOUNT	CODE
17/04/2023	Company Code : DFC#041 Completion date of intensive property works for MG Pastoral at 'Wyndabar' Shelford, Victoria. Work undertaken by the Small Farm Contracting team involved weed spraying and preparation of fire breaks by brush cutting and mowing. Preparation for burning back paddock-cutting of fire breaks for safe burning; cutting of south break and mowing of east plantation and north break; spot spraying Serrated Tussock in large back paddock; spot spraying Serrated Tussock in area west of sheds 1890 litres of chemical applied. Always committed to best practice and positive outcomes, the Small Farm Contracting team continues to value the opportunities to contribute to the MG pastoral property developments and management. Kind regards, Graham Hewitt Manager	\$11,426.80	GST
Payment by Cheque to Postal Address or Electronic Funds Transfer (EFT) ***PLEASE NOTE: NEW BANK DETAILS BELOW***		GST:	\$1,038.80
EFT DETAILS:		Total Inc GST:	\$11,426.80
Account Name: Small Farm Contracting		Amount Applied:	\$0.00
Bank: Bendigo Bank		Balance Due:	\$11,426.80
BSB: 633-108			
ACCOUNT NUMBER 1559 - 95590			







Appendix #16.

Tax Invoice

Invoice No 1
Date: 24/06/22

From : K & J Blake
 265 Eastern Access,
 Barunah Park 3329

ABN: 11262249562

Ph 0427813271 KJ

Mb 0417513271 JB

Email: jennyblake1@bigpond.com

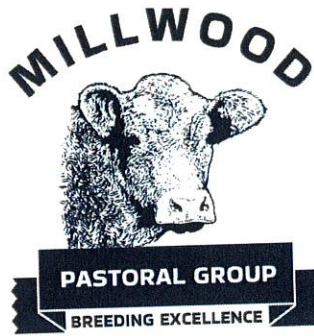
To : Dennis Family Homes
 C/O J. Richmond,
 Rose Grange Pastoral Co
 "Rockleigh"
 Little River Vic 3211

jock@rosegrangepc.com.au

Boundary Fence between K & J Blake & Dennis Family Homes.

	Description	Unit Price (excl. GST)	Taxable Supply (Y/N)	Unit Price (incl. GST)	GST Amount	Total
1	116 Gal Steel posts			10.00	105.45	1160.00
2	4 strainers			53.00	21.20	233.20
3	2 stays			21.00	4.20	46.20
4	3.5 7 line cyclone			287.00	91.31	1004.50
5	2 rolls plain wire			250.00	50.00	550.00
6	1 length sheep mesh			55.00	5	55.00
7	Gripples			15.00	1.36	15.00
8						
9	Labour S. Fagg				135.00	1485.00
10	Labour K Blake:- Removal old fence & wire Level fence line of rocks & Phalaris Spray fenceline with roundup prior to commencement				200.00	2200.00
11						
12	Total sum expended in erection of boundary fence				613.52	6748.90
13	Half Share of costs				306.76	3374.45
14						
15						
16	Balance owing					3374.45
17						

--	--	--	--	--	--	--



Land Owner of offset site : M.G. Pastoral Co. Pty. Ltd.

Location and address of offset site : 1541 Shelford Rokewood Rd. Rokewood, Vic.

Offset site number : EPBC 2011/6004

Offset plan ref. number : BL&A 14094 Feb. 2015

Responsible Authority : Dept. of The Environment.

Report No. : #8, April 14, '23 - April 14, '24

Signature :

Name : Marshall G. Dennis

Date : 11/5/26.

Millwood Farm Services Pty Ltd ABN 52 004 427 874
trading as Millwood Pastoral Group
Level 4, 863 High Street, ARMADALE VIC 3143
Telephone: (61) 3 8391 4420



Management Actions – EPBC 2011/6004

Year # 8 April 14, 2023 – April 13, 2024.

‘Wandabar’ : 1531 Shelford Rokewood Rd. Rokewood Vic.

In mid-April 2023, Small Farm Contracting (SMF) prepared fire breaks around most of the southern site (Area B), in the sth. east corner of the property, either by mowing or brush cutting. The firebreaks were created outside of the offset zones. The slashed / mown firebreaks were in preparation for the ‘cold burn’ in Autumn / Winter of ’23.

After deferring to the offset management plan, the realisation that controlled burning was not recommended became apparent. We engaged in discussion with Nature Advisory (NA) regarding the discrepancy between the biomass management recommended action for SRF at Rokewood versus actions for biomass control at other SRF locations. NA subsequently advised that it may fall under the ‘adaptive management’ concepts within the OMP, (pages 32 & 33). However, the scheduled burn of Area B, did not take place, as it was deemed to potentially be too destructive of the Golden Sun Moth and Striped Legless Lizard populations on site.

Serrated Tussock was targeted with a regime of spot spraying in this area (B).

There continues to be no grazing by livestock (sheep) of Area A, nor has there been any fertilizer of any description applied the offset site(s).

Further discussion arose with NA regarding the controlled burning of Area A. The area within zone 20 has very sparse and intermittent biomass however a moderate infestation of onion weed. It was decided that a controlled burn would be of benefit to the SRF’s. Due to the dryer than normal conditions and as we deliberated the possibility of burning, we missed the ‘window’ of potential burning months. This action was deferred until May of ’24 for Area A.

Fencing and gates were routinely inspected, by either a representative of MG Pastoral or a sub-contractor, Small Farm Contracting. Specifically, the integrity of the rabbit proof fence of the SRF plot in the nth. east corner, was a particular focus. Again, there were no noticeable penetrations nor deficiencies with the integrity of the fence. The north and eastern sections of fencing of the southern plot remains in good stock proof condition. The eastern fence is in a serviceable condition.

G. R. Hewitt trading as

Small Farm Contracting Pty Ltd

A.B.N.: 30 608 262 942

POSTAL ADDRESS:
P.O. BOX 61, LEOPOLD 3224

TRADING ADDRESS:
30 Como Road, LEOPOLD 3224

Tax Invoice

Ph: (03) 5250 1693
Mob: 0417 044 464
Fax: (03) 5250 2743

Online:
www.smallfarmcontracting.com.au
Email: grahamrhewitt@gmail.com

Bill To:

MG Pastoral Co.Pty Ltd DFC#041
Level 4,
863 High Street
Armadale Vic 3143

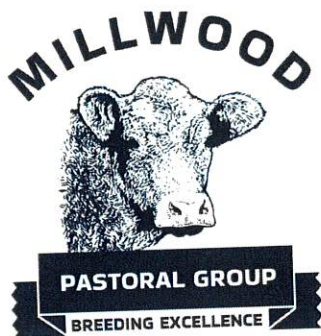
Invoice #: 00002872

Date: 24/04/2023

Page: 1

COMMERCIAL OPERATORS REGISTERED LICENCE NO. 126

DATE	DESCRIPTION	AMOUNT	CODE
17/04/2023	Company Code : DFC#041 Completion date of intensive property works for MG Pastoral at 'Wyndabar' Shelford, Victoria. Work undertaken by the Small Farm Contracting team involved weed spraying and preparation of fire breaks by brush cutting and mowing. Preparation for burning back paddock-cutting of fire breaks for safe burning; cutting of south break and mowing of east plantation and north break; spot spraying Serrated Tussock in large back paddock; spot spraying Serrated Tussock in area west of sheds 1890 litres of chemical applied. Always committed to best practice and positive outcomes, the Small Farm Contracting team continues to value the opportunities to contribute to the MG pastoral property developments and management. Kind regards, Graham Hewitt Manager	\$11,426.80	GST
Payment by Cheque to Postal Address or Electronic Funds Transfer (EFT) ***PLEASE NOTE: NEW BANK DETAILS BELOW***		GST:	\$1,038.80
EFT DETAILS: Account Name: Small Farm Contracting Bank: Bendigo Bank BSB: 633-108 ACCOUNT NUMBER 1559 - 95590		Total Inc GST:	\$11,426.80
		Amount Applied:	\$0.00
		Balance Due:	\$11,426.80



Land Owner of offset site : M.G. Pastoral Co. Pty. Ltd.

Location and address of offset site : 1541 Shelford Rokewood Rd. Rokewood, Vic.

Offset site number : EPBC 2011/6004

Offset plan ref. number : BL&A 14094 Feb. 2015

Responsible Authority : Dept. of The Environment.

Report No.: #9, April 14, '24 - April 13, '25

Signature:

Name : Marshall G. Dennis

Date : 1/5/26.

Millwood Farm Services Pty Ltd ABN 52 004 427 874
trading as Millwood Pastoral Group
Level 4, 863 High Street, ARMADALE VIC 3143
Telephone: (61) 3 8391 4420



Management Actions – EPBC 2011/6004

Year # 9 April 14, 2024 – April 13, 2025.

‘Wandabar’ : 1531 Shelford Rokewood Rd. Rokewood Vic.

The Spiney Rice Flower community contained within Zone 20 of Area A was burnt on May 16, '24. The SRF's were not in flower, nor looking like they were close to flowering at the time of the 'cold burn' In previous weeks, as part of yr. 8 management actions, Small Farm Contracting (SFC) undertook slashing of firebreaks within the fenced off area, but outside of the offset zone. Weather for the day, was sunny with little to no wind, which made for a well-managed 'cold burn'. Images of the burn are attached at appendices 1-4.

Attached at appendices 5-10 are images of Area A post 'cold burn', taken on a site visit by an MGP representative, on July 2, 2024.

Images 11-13 depict the re-growth of SRF's post 'cold burn' also taken on July 2, 2024. Clearly visible are the numbered, stainless-steel washers staked adjacent to each plant within the community.

There continues to be no grazing by livestock (sheep) of Area A, nor has there been any fertilizer of any description applied the offset site(s).

Area B was assessed to require grazing to help minimise the extent of Phalaris; this was done in mid-May early June. Pulse grazing continues to be problematic, given the size of the paddock and the extent of the infestation of Phalaris. Further, the paddock does not have a dedicated water point for sheep, other than a very small dam in the south-west corner of the fenced paddock. As the drier periods continued, ('22, '23 & '24) no runoff of surface occurred and the small dam was all but dry, posing a real welfare risk to grazing sheep, esp. in large numbers. The paddock was unsecured allowing sheep on the adjoining paddock, (outside the offset area) to graze for a lengthier period.

Spot spraying of various weeds, especially Serrated Tussock (*Nassella trichotoma*) was undertaken by SFC in this area.

Fencing and gates were routinely inspected, by either a representative of MG Pastoral or a sub-contractor, Small Farm Contracting. Specifically, the integrity of the rabbit proof fence of the SRF plot in the nth. east corner, was a particular focus. Again, there were no noticeable penetrations nor deficiencies with the integrity of the fence. The north and eastern sections of fencing of the southern plot remains in good stock proof condition. The eastern fence is in a serviceable condition.



























