24th September 2026

MG Pastoral Pty Ltd

Level 1, 863 High Street

Armadale Victoria 3143

Attention: Marshall Dennis
By Email — Marshall.dennis@ranfurlieam.com.au

Dear Marshall,

RE: ROKEWOOD OFFSET SITE

Spiny Rice Flower Targeted Survey

PROJECT NUMBER 22192.06

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 offset site 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 provide information on the SRF population in the offset site to satisfy EPBC compliance requirements and relevant approval condition (EPBC 2011/6004), specifically that *'there must be at least 660 Spiny Rice Flower individuals'* following 10 years of management in accordance with the OMP (BL&A 2015).

The site has since finished its 10th year of management and reporting. This survey details the results of the final Year 10 survey and provides management recommendations.

Scope

The scope of work specifically includes the following:

- SRF surveys conducted and timed to coincide with the flowering season of SRF (June-August).
- Transects were undertaken and recorded at 5 m intervals in areas of suitable habitat with previously detected SRF records.
- Any identified SRF were recorded using a hand-held GPS. Where an original tag was found, its number was assigned to the individual.
- Capture representative photos of SRF present.

- An additional scent detection dog survey trained in locating SRF was undertaken in additional areas of suitable habitat where SRF had either not been identified previously or not identified within the last 2025 survey but had been identified prior. This survey was intended only to supplement the Botanist survey and not to replace the efforts of this survey.

This investigation was undertaken by a team from Naure Advisory comprising Neassa Fritchley (Botanist), Ezra Janetzki (Botanist), Nicola Roysmith (GIS Analyst), Jackson Clerke (Senior Ecologist), Kitty (Scent detection dog) and Suzie Moss (Botanist & Project Manager).

Methodology

Suitable Habitat

As this investigation is aimed at confirming population size within the offset site, botanist targeted surveys for Spiny Rice-flower were conducted only in areas that previously supported populations and not the entire offset area. These included individuals mapped in the initial OMP (BL&A 2015) and more recent surveys (Nature Advisory 2020; Nature Advisory 2025). An additional survey by a qualified ecologist and scent detection dog trained in locating SRF was undertaken in areas where SRF has not been previously detected, or was not relocated during the 2025 surveys but suitable habitat exists, particularly in areas where visibility was low to increase the chance of detection.

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 3 and 4 August 2026.* These methods included:

- Parallel transects were traversed by qualified botanists, spaced 5 m apart, while visually inspecting the surrounding area between the 3rd – 5th August 2026. Transects were tracked using ArcGIS Field Maps® (ESRI), shown on Figure 1. Botanist surveys focused on areas where SRF was known or was previously known to occur.
- 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.
- Each individual was also assigned a sex: Male (M), Female (F), and Hermaphrodite (H) (Photo 1). Sex determination was done by inspecting the plant's floral anatomy:

  Male individuals contain prominent anthers that are bright orange with pollen; the inflorescence tends to be more erect and has an overall showier appearance due to the orange anthers.

  Female individuals have a protruding style and two small, sterile anthers; the inflorescence often has a nodding posture and slightly smaller flowers.

  Hermaphrodite individuals contain a mix of male and female flowers

Photo 1: Representative photos of Male (Left), Female (Middle), and Hermaphrodite (Right) SRF plants

In addition to this, scent detection dog transects were focused mainly on areas where SRF has not been previously detected but suitable habitat exists, especially in areas where visibility was low to increase the chance of detection. These transects were spaced roughly 10m apart within higher quality habitat and 20m within poorer quality habitat and occurred on the 24th August 2026. A qualified ecologist was present during the scent detection dog surveys to confirm any positive indications and visually inspected the surrounding area. This survey was intended only to supplement the Botanist survey and not to replace the efforts of this survey which were considered sufficient on their own. Transects were tracked using ArcGIS Field Maps® (ESRI), shown on Figure 1. Additional detail relevant to the scent detection dog survey is provided below:

- The scent detection dog was initially tested within the dense SRF population within the northeast of the study area. This familiarised the location and focused the scent survey. The scent dog was appropriately indicating a positive response and accurately locating SRF in this area and was then instructed to survey additional areas.
- Weather and timing was considered suitable for the survey, wind was fairly strong however as the scent detection dog was able to accurately locate SRF in the test location this was not considered a limitation: wind N 31km/h gusts, moderate otherwise, temperature 16 C, humidity 91%.

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) and 2025 (Nature Advisory 2025). The following contains the total SRF population across each survey:

- 2014 – **549**
- 2020 – **350**
- 2025 – **496**

The population is almost entirely confined to the northeast portion of the study area, with few lone individuals persisting elsewhere. The initial OMP identified a second population of roughly 5 individuals along the northern boundary of the study area; however, this was not relocated during the 2025 targeted surveys (Nature Advisory 2025).

Survey results and discussion

During the 2026 surveys, 419 Spiny Rice-flower were recorded within the offset area, 418 during the botanist survey and one additional record during the scent detection dog survey (Figure 1). This represented a 15% decline from 2025 and an overall 24% decline from 2014, noting that this may be due to many factors. No additional SRF populations were identified aside from those in the northeast main population, one individual in the southern portion of the Offset Site (Photo 2) and one from the previous northwest population which was relocated during the scent dog survey. This individual appeared to be part of the smaller second population along the northwest boundary, initially identified in the OMP but not relocated during the 2025 surveys. This record had been hidden under dense biomass and appeared to be compacted by sheep tracks and was confirmed by an ecologist in 2026, a targeted survey was conducted around this record, but no other individuals were detected in this area. It is recommended that this individual also be caged to protect it from sheep damage.

Photo 2 (left): Caged SRF in the southern portion of the Offset Site & Photo 3 (right): Tag identified with no SRF

The SRF population was heavily weighted in favour of female flowers (219 individuals), roughly 53% of the persisting population; males (141 individuals), with their prominent yellow anthers, contributed 34%, while hermaphrodites (54 individuals) were roughly 13%.

Of the 419 SRFs, only 143 individuals were identified with their respective tags, set in place during the original assessment. Some tags were also found without any SRF within their vicinity (Photo 3).

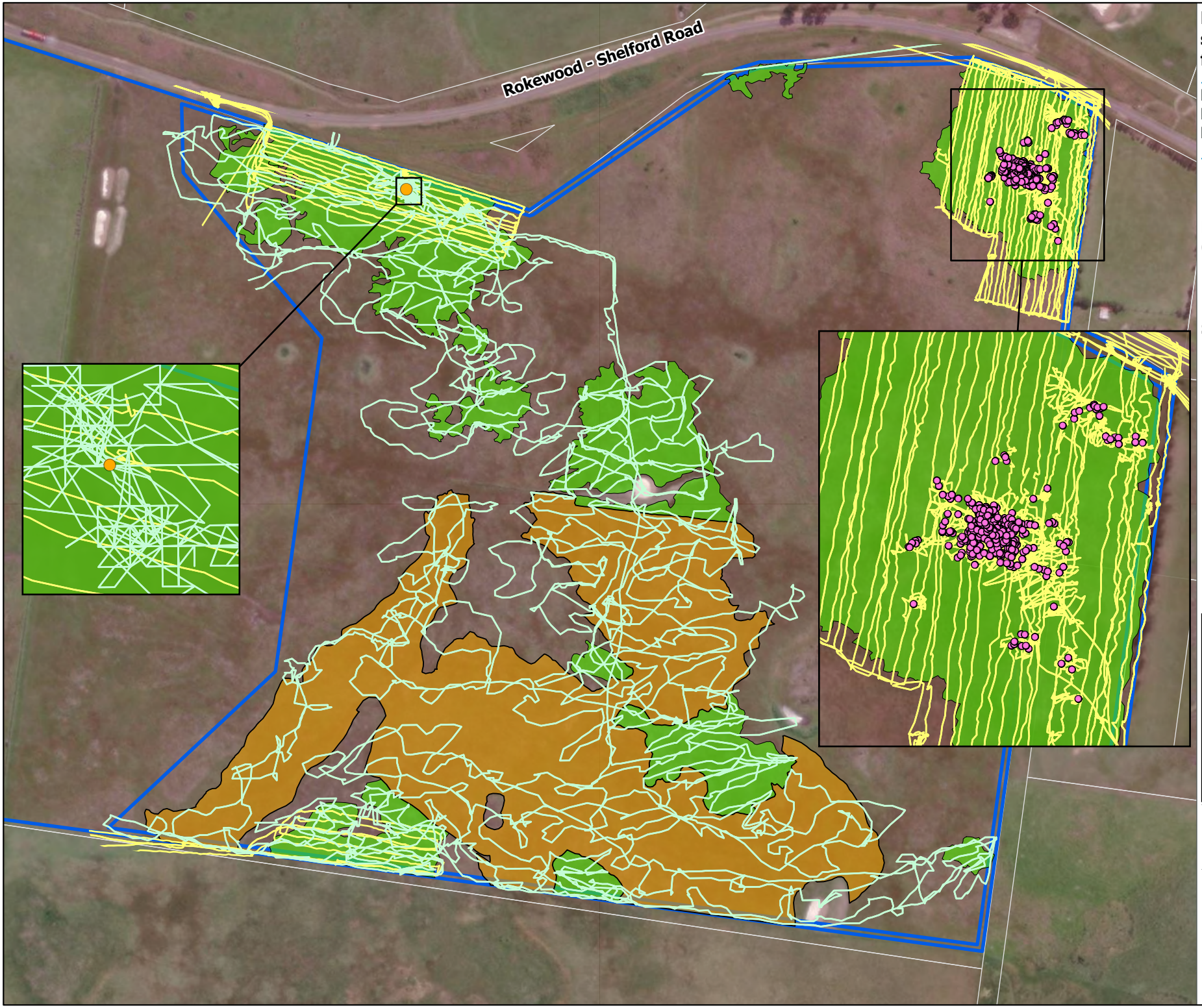


Figure 1A: 2026 Targeted survey for Spiny Rice-flower

Project No: 22192.02
Project: Rokewood Offset Site, VIC
Date: 9/10/2026

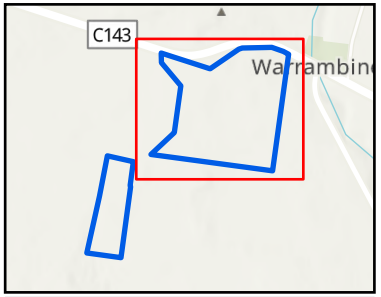
Study Area
Property Boundary

Native Vegetation - OMP (Nature Advisory 2014)

NTGVVP
NTGVVP - Partial Extent

Spiny Rice-flower survey

Spiny Rice-flower
Survey Effort
Survey effort - Scent detection dog
Spiny Rice-flower - Scent detection dog



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Metres
0 30 60 90 120 150

GDA2020 Vicgrid

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Figure 1B: 2026 Targeted survey for Spiny Rice-flower

Project No: 22192.02
Project: Rokewood Offset Site, VIC
Date: 9/10/2026

Study Area
Property Boundary

Native Vegetation - OMP (Nature Advisory 2014)

NTGVVP
NTGVVP - Partial Extent

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Survey effort - Scent detection dog
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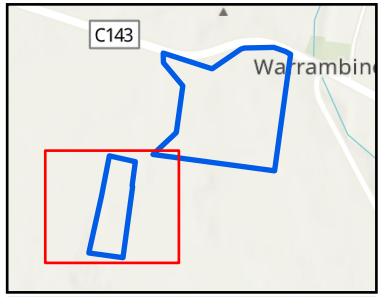

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Active management was also noted within the main SRF population. This was namely cut-and-spray of *Phalaris aquatica* (Toowoomba Canary-grass) tussocks that had germinated. If left to set seed, these individuals would have likely contributed to further fragmentation of the current habitat.

Although this exercise was aimed at detecting the upper limit of SRF within the Offset Site, population fluctuations have been noted throughout the 10 years of management. Differences observed between surveys are likely due to increasing biomass reducing the detectability of smaller, non-flowering individuals visible a year prior (Photo 4). As an ad hoc note, very few recruiting individuals were identified in 2026 compared with those recorded in 2025. Fluctuations in population numbers are susceptible to other influencing factors that are not limited to but could include:

- Seasonal challenges for SRF longevity and recruitment (e.g. unusually warm/dry winters and summers);
- Lack of low-intensity burning/high biomass, it is noted that the site was burned previously in 2024 and would benefit from another burn in 2027;
- Open grazing in the wider offset area (excluded from the large SRF population) meant individuals can be eaten by sheep or other farm animals or trampled as appeared to be the case with the northwest record;
- Weed encroachment reducing recruitment area and increasing competition.

Photo 4: Detectability challenge in increased biomass, red circles represent SRF individuals.

Recommendations

The Year 10 survey recorded 419 SRF individuals, which is less than the 660-individual outcome required under condition 2(c) of EPBC 2011/6004. Although this outcome has not yet been achieved, the population cannot be reliably determined, having shown both decreases and increases in previous years. However, survey results suggest that the population has had a relatively small overall but disproportionate loss in individuals, compared to the evidence of recruits overall. The population is considered unlikely to increase without more intensive active management.

A high proportion of female plants was recorded during the Year 10 survey. The disproportionate ratio of female plants may be limiting germination and recruitment potential within the population. This effect has likely been exacerbated by increased weed cover and reduced bare ground within the population area (DSE 2005). Engaging an experienced bushland contractor to implement more intensive weed control and frequent, low-intensity burns, as intended, is expected to improve habitat structure and support recruitment of new individuals. Adaptive management and rehabilitation methods to address the shortfall against condition 2(c) outcome are being discussed with the proponent and a qualified ecological contractor. These measures are directed at supporting the population towards the outcomes required under condition 2 and include:

- More appropriate biomass management and low-intensity burning (appropriate for both SRF and Striped Legless Lizard which also occurs in the offset);
- Intensive weed control, primarily aimed at controlling Toowoomba Canary-grass and preventing further spread into the SRF main population;
- Improvement of habitat structure and creation of bare ground or inter tussock space through biomass management and weed control to encourage recruitment of SRF;
- Caging individual SRF recorded in the northwest to protect it from grazing;
- Reviewing the suitability of strategic grazing within the offset area and specific guidance around its implementation as per the OMP. Such as only implementing it periodically with suitable rest periods and ensuring it doesn't occur when conditions are too wet or too dry to avoid soil damage; and
- Use of direct seeding with suitable native grass species to improve habitat quality and structure as well as reducing cover and competition from weeds.

Supplementary rehabilitation and management recommendations can be provided to the relevant authority for review as required. Please do not hesitate to reach out for further details

Yours sincerely,

Suzie Moss

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Nature Advisory Pty Ltd

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References

Brett Lane and Associates (BL&A) 2015, *1541 Rokewood-Shelford Road, Rokewood: Offset Management Plan for Matters of National Environmental Significance, Report No. 14094 (3.2)*, Brett Lane and Associates Pty Ltd, Hawthorn, Victoria.

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