Clearing Assessment Report & Vegetation Management Plan (VMP) – CPS 818

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Great Northern Highway (GNH) H006
Fitzroy to Gogo Upgrade

Kimberley Region
EOS 3490

D26#53422
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Document Control

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1 PROPOSAL

1.1 Purpose and Justification

The Fitzroy Crossing to Gogo section of the Great Northern Highway (GNH) crosses an extensive floodplain associated with the Margaret River and Fitzroy River. This section of GNH is subject to annual flooding following wet season rainfall events, resulting in road closures for several days or weeks, depending on the severity of flooding. The project is to upgrade approximately 10 km of GNH between Fitzroy Crossing and Gogo Station to meet current serviceability levels for a national highway, inclusive of three side road intersections at Fossil Downs Road, Gogo Road and Lamey Ave.

A significant number of Aboriginal communities east of this section of GNH become isolated during road closures, with Halls Creek the next closest town, some 290 km east of Fitzroy Crossing. With Bayulu and Gillarong communities located at the eastern end of the project site, the existing highway accommodates pedestrian traffic through to Fitzroy Crossing. Pedestrian traffic currently utilises the unsealed shoulder; the new highway would incorporate sealed road shoulders to provide safer and improved access.

1.1.1 Main Roads Approach to Road Safety and the Environment

Main Roads is committed to minimising the environmental impacts of all of its activities and manages the State road network to achieve balanced economic, social, safety and environmental benefits for the community. Main Roads recognises that Western Australia's environment is significant from a global perspective and the unique conservation values that are contained within its road reserve. Main Roads road network often adjoins natural areas and, in some locations, the reserve itself hosts remnant vegetation with high environmental values. Although the reserves were not established for this purpose, Main Roads recognises that it has a responsibility to conserve the environmental values that occur within the State's road network and minimise the impact its proposals have on the environment. In addition to providing a safe and efficient road network for all people using the roads under its control, Main Roads is also committed to protecting the natural environment.

In accordance with National and State Government road safety policies, Main Roads is also committed to substantially reducing road trauma on the road network through Safe System principles. The Safe System approach acknowledges that more than two thirds of all serious crashes are due to human error rather than deliberate risk taking (e.g. speeding or drink driving) and seeks to improve behaviour through education and enforcement while managing the safety of vehicles, speeds and the road and road infrastructure. It is shown that improving sub-optimal road formation will substantially reduce the likelihood and severity of road crashes. For example, according to the Road Safety Management Guideline, increasing the sealed shoulder from 0.5 m to 2 m will reduce Killed and Seriously Injured numbers by more than 50%.

As the statutory authority responsible for providing and managing a safe and efficient main road network in Western Australia, Main Roads focuses on improving road safety by thoroughly considering all environmental, economic and community benefits and impacts. It operates on a hierarchy of avoiding, minimising, reducing and then, if required, offsetting our environmental impacts. This has been achieved through changes in proposal scope and design. Main Roads regularly reduces its clearing footprint by restricting earthworks limits for proposals, steepening batters, installing barriers, establishing borrow pits in cleared paddocks and avoiding temporary clearing for storage, stockpiles and turn around bays to avoid and minimise its impacts.

Further details on measures to avoid, minimise and reduce are provided in Section 1.6.

1.2 Proposal Scope

The proposal scope includes upgrade and realignment of approximately 10 km of GNH between Fitzroy Crossing and Gogo Station. The works will involve:

- Construction of approximately 10 km of new road (11 m seal on 11 m formation).
- Investigation and development of material pits to support the upgrade works.
- Construction of two new creek crossings, which will comprise of a bridge structure over Two Mile Creek and a large culvert structure at Blue Bush Creek.
- Upgrading floodways and culverts along the new realignment and existing highway.
- Laydown areas for plant and materials supporting the construction works.
- Installation of Intelligent Transport Systems, including remote censoring of flood levels.
- Removal and rehabilitation of existing GNH and demolition of existing single lane single bridges at Two Mile Creek and Blue Bush Creek.

Construction works are planned to commence in 2026 with a 2-3-year build duration.

1.3 Project Background

Investigations into upgrading the Fitzroy Gogo section of GNH have been ongoing since the early 1980s and has been the subject of several waterways investigations. Extensive design and development activities were undertaken between 2006 and 2014 including environmental and heritage surveys, followed by consultation with key stakeholders, including the local community. The Project was referred to the Department of Sustainability, Environment, Water, Populations and Communities (DSEWPaC) under the EPBC Act, in 2011. In 2012, DSEWPaC deemed the proposal to be a 'Controlled Action' due to potential impacts on the:

- National Heritage Places - associated with the Gogo formation
- Listed Threatened Species and Communities - associated with Freshwater Sawfish (*Pristis pristis*) (Endangered and migratory)

Further to the preliminary assessment, DSEWPaC approved the proposal in June 2013 subject to a number of conditions and an expiry date of 31st May 2023. However, due to lack of funding and the significant environmental impacts, the project was not delivered.

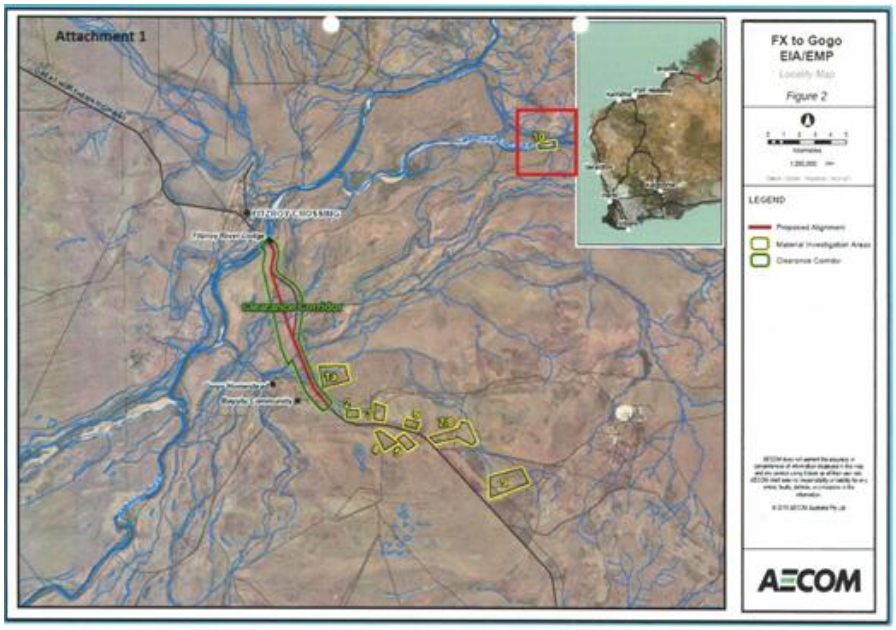
Since then, the project design has been extensively reviewed, and the proposal scope has been significantly reduced to avoid high-risk areas. Key differences between the project proposed in 2012 and 2026 is provided in the table below and further discussed in detail:

Key Elements	2012 Project	2026 Project
Length	11.4 km section of the highway.	Approximately 10 km section of the highway.
Infrastructure	Included construction of four bridges - Coorie Billabong and Gogo (new) and Two Mile Creek and Blue Bush Creek (replacement).	Construction of a bridge at Two Mile Creek (Coorie Billabong and Gogo bridges have been removed and Blue Bush Creek crossing will now be culverts).

	Substantial channels to be excavated under the bridges.	Minor channel widening in the vicinity of bridge.
Embankments	Approximately 7.5 km of high-level embankments averaging 3 to 5 m high with eastern end embankments between 5 and 8 m high.	Less than 4.5 km of low-level embankments average 1 to 2 m high.
Floodways	Raised floodways between 2–4 meters in height, totalling 3.5 km.	Although floodways and culverts will be built along the new realignment, and upgraded on the existing highway, this proposal has less and lower (<2m) raised floodways.
Material Extraction	Up to ten material investigation areas, including Material Investigation Area 10 (Pit 10), which is near the Gogo Fish Fossil Site.	Excludes Material Investigation Area 10 (Pit 10), which is near a registered Gogo Fish Fossil Site.
Clearing	Clearing of up to 275 ha.	Clearing reduced to 198 ha.

Exclusion of Pit 10 (Gogo Fish Fossil Site)

The 2026 project does not include the Material Investigation Area 10, which was identified as a sensitive area due to its proximity to the Gogo Fish Fossil Site, a registered National Heritage site. This eliminates the risk of disturbing paleontological material, including fossils of significant scientific and cultural value (*see figure below from 2012 Project – Pit 10 in red square*).



It should also be noted that Gogo Fossil Site / Gogo Formation is no longer on the official National Heritage List that is maintained by DCCEEW - the list does not include the Gogo Fossil Site or Gogo Formation as a listed place.

Freshwater Sawfish (*Pristis pristis*)

The 2026 project eliminates the construction of two new bridges (Coorie Billabong and Gogo) and instead focuses on upgrading existing creek crossings with a bridge at Two Mile Creek and a culvert at Blue Bush Creek. The clearing footprint has been reduced from 275 ha to 198 ha. The highway length across the Fitzroy River floodplain is 10 km and consists of 55 culvert structures. The scale and nature of the project have changed with less bridges now being built but has been designed to include more effective culverts/drainage infrastructure to significantly improve the movement of surface water than the current road alignment. Given the reduced scope and construction activities are planned to occur during the dry season when the Fitzroy River and its tributaries, including Two Mile Creek and Blue Bush Creek are in "no flow" conditions, the proposal is not expected to impact the Freshwater Sawfish (Sawfish). This was achieved by focusing on using existing infrastructure and thus reducing the need for extensive new construction and associated environmental impacts.

As outlined above, the 2026 Project is less substantial than the original 2012 Project. The structures now being installed are capable of accommodating smaller flood events, while safely allowing road closure during larger, more significant events. By excluding Pit 10, reducing the number of bridges being built and making it less "floodproof" (less and lower embankments and floodways), the current proposal is very different to the proposal approved by DSEWPaC in 2013.

Referral of 2026 Project to DCCEEW

To comply with DCCEEW guidelines and in consideration of the revised project scope, Main Roads has conducted an assessment in accordance with the *Matters of National Environmental Significance - Significant impact guidelines 1.1 - Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth of Australia 2013) for both the National Heritage Place (Gogo Formation) and the Sawfish (Endangered and Migratory), to determine if the revised project is likely to have a significant impact on matters of national environmental significance.

Accordingly, referral of the project to DCCEEW for impacting the Gogo formation is no longer required.

Furthermore, due to the reduce scale of impact and the timing of works to dry conditions, an application of significant impact criteria for both endangered species and migratory species conducted for the Sawfish determined that the 2026 Project will not:

- lead to a long-term decrease in the size of a population
- reduce the area of occupancy of the species
- fragment an existing population into two or more populations
- adversely affect habitat critical to the survival of a species
- disrupt the breeding cycle of a population
- modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline
- result in invasive species that are harmful to a critically endangered or endangered species becoming
- established in the endangered or critically endangered species' habitat
- introduce disease that may cause the species to decline, or
- interfere with the recovery of the species.
- substantially modify (including by fragmenting, altering fire regimes, altering nutrient cycles or altering hydrological cycles), destroy or isolate an area of important habitat for a migratory species

- result in an invasive species that is harmful to the migratory species becoming established in an area of important habitat for the migratory species, or
- seriously disrupt the lifecycle (breeding, feeding, migration or resting behaviour) of an ecologically significant proportion of the population of a migratory species.

As no significant impacts to the MNES are likely to occur, referral under the EPBC Act 1999 is not required.

1.4 Proposal Location

The Project Development Envelope (PDE) is located on Great Northern Highway (GNH) H006 between SLK 2525.0 – 2535.7, starting east of the Fitzroy Crossing River within the Shire of Derby-West Kimberley as shown in Figure 1. The central coordinate of the proposal is:

Latitude: -18.247510
Longitude: 125.588925

1.5 Clearing Details

Proposed Clearing to be undertaken using CPS 818: 198 ha in a 1,019 ha Project Development Envelope (PDE)

Areas of Native Vegetation Clearing:
The areas of native vegetation to be cleared are shown in Figure 1.

Type of Native Vegetation:
The types of vegetation to be cleared under this Proposal is shown in Figure 3a – 3f.

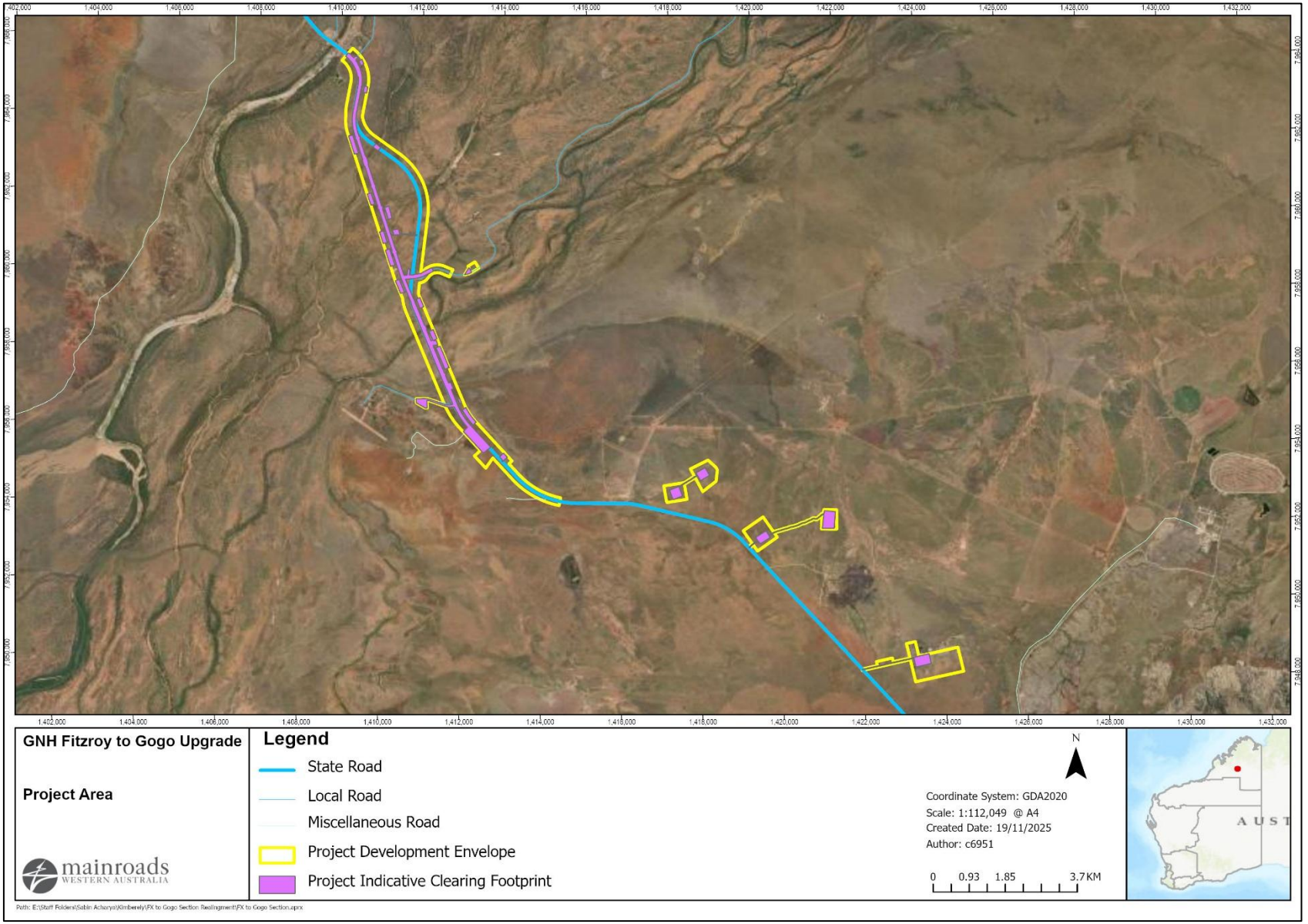


Figure 1. Project Development Envelope and Indicative Clearing Footprint

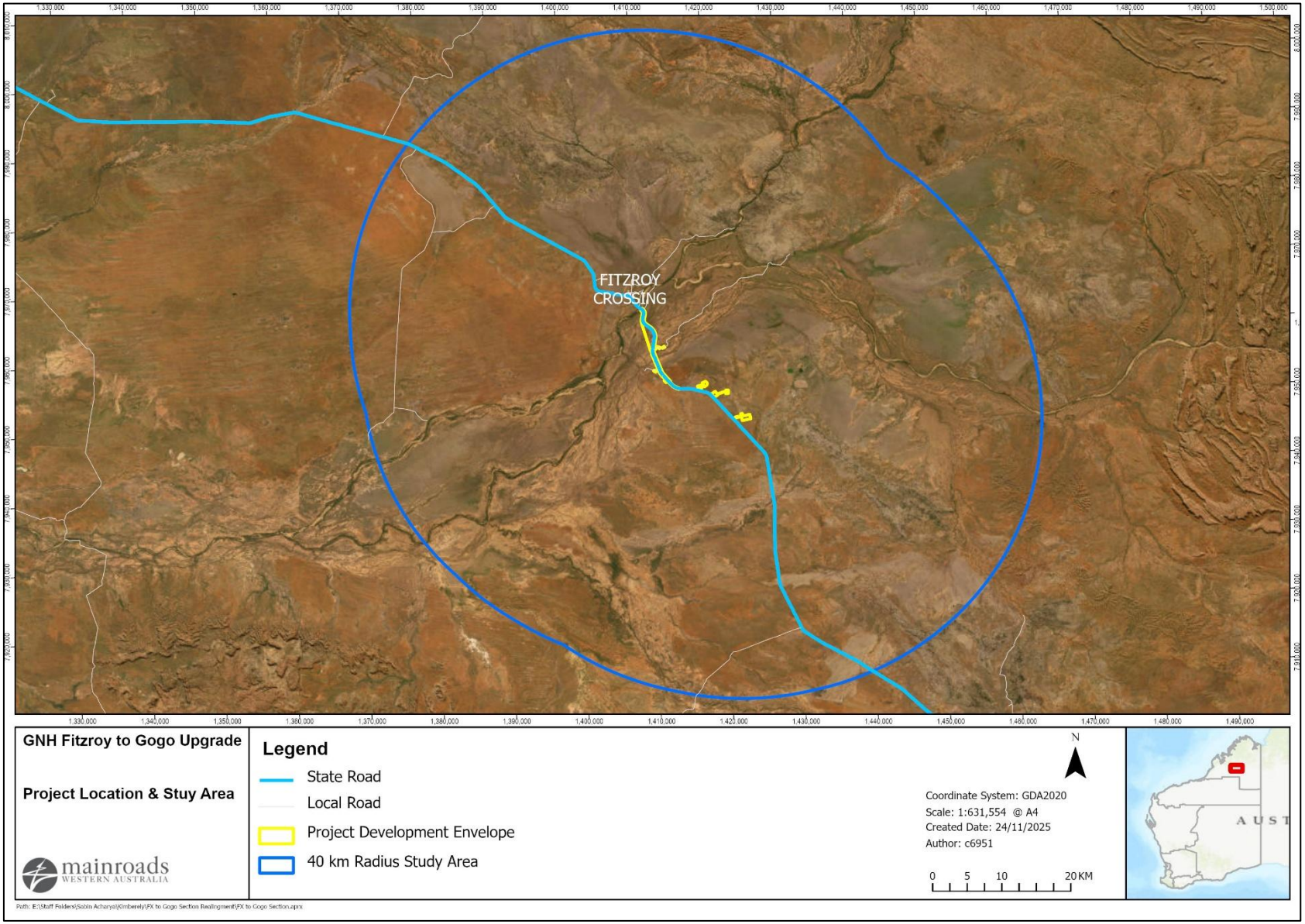


Figure 2. Project Location and Study Area

1.6 Alternatives to Native Vegetation Clearing Considered During Proposal Development

The following alternatives to clearing were considered during the development of the proposal:

- Upgrading other alternative routes that are less vegetated and environmentally constrained, however these are not suitable due to longer travel times, sensitive local receptors (such as residences) or other heritage and planning issues.
- Do not upgrade the road, however this will potentially result in a poorer safety outcome and may result in future fatalities or serious injuries and further degradation of the State road asset.
- Main Roads retains frangible vegetation where a clear zone is to be established for road projects. For this project, however, clearing will only be required to accommodate the road formation, with no clear zone being established. Accordingly, the retention of frangible vegetation does not apply to this proposal.
- Reducing the speed limit to minimise clearing requirements, while still balancing safety (driver fatigue) and freight efficiency. Speed Limits are an essential mechanism to ensure the safe and efficient operation of road networks. The application of appropriate speed limits and other traffic management measures is a key mechanism in managing vehicle speeds to achieve desired safety, mobility, traffic management, local amenity, and road user expectations. There are several factors involved in road safety, including road conditions, driver behaviour and overall road design. Except in special situations, reducing speed limits below national standards on state and national roads is not typically supported as it has the potential to contribute to driver frustration, impatience, tiredness and recklessness. The environmental values protected by reducing the speed limit, do not justify the impacts on freight efficiencies nor road user safety. Accordingly, the reduction of the speed limits to avoid clearing of native vegetation for this proposal is not proposed.
- A significantly larger more expansive project design clearing footprint was initially proposed but was ultimately reduced and existing material pits were proposed to reduce the costs and potential impacts on priority flora.

1.7 Measures to Avoid, Minimise, Reduce and Manage Proposal Clearing Impacts

The design and management measures implemented to avoid and minimise the potential clearing impacts of the Proposal are provided in Table 1.

Table 1. Measures Undertaken to Avoid, Minimise, Reduce and Manage the Proposal Clearing Impacts

Design or Management Measure	Discussion and Justification
Alignment to one side of existing road	The proposed alignment aims to balance safety outcomes by maintaining a suitable curve geometry for a 110km/h rated sealed national highway as well as environmental impacts. Subsequently, alignment to one side of the existing road is not feasible, however the proposal does utilise large portions of the existing road.
Alternative alignment located within pasture or degraded areas	The new alignment chosen for this project compliments the current Great Northern Highway alignment. Based on the safety design the current alignment is the appropriate one. There are no alternative alignments available.
Simplification of design to reduce number of lanes and/or complexity of intersections	The current alignment cannot be further simplified whilst retaining the necessary safety benefits and reduced clearing.
Installation of barriers	Safety barries are not feasible for this section of road due to the long and straight alignment, coupled with the cost of providing and maintaining barriers. Barriers also pose a risk to road users as run-off-road incidents may result in vehicles being directed back onto incoming traffic.
Installation of kerbing	Kerbing is not a practical solution in the Kimberley due to the nature of material used for pavements, rainfall and the types of crashes (high speed, run off-road).
Use of existing cleared areas for access tracks, construction storage and stockpiling	Where possible, existing cleared areas have been included into the drainage design and access points for pits and laydowns. A temporary workers camp on the Pillara Access Road is proposed on an existing cleared area.
Drainage modification	Where possible, existing drainage lines will be utilised to minimise disturbance to existing vegetation. Given the new alignment, the project's location on a floodplain and the region receiving high rainfall in a short period, the project requires installation of new culverts and drainage structures to minimise water erosion and surface run off.

Design or Management Measure	Discussion and Justification
Modification of Clearing footprint to reduce clearing and exclude sensitive areas	The Project Indicative Clearing footprint was refined numerous times, based on the findings of biological surveys. The footprint was reduced to minimise the total clearing extent and avoid areas of high Priority Flora occurrence. Where Priority Flora could not be avoided, efforts have been made to minimise impacts to areas with high population densities.

1.8 Approved Policies and Planning Instruments

The clearing of native vegetation in Western Australia is regulated under the EP Act and the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* (Clearing Regulations).

In addition to the matters considered in accordance with section 51O of the EP Act, Main Roads has also had regard to the below instruments where relevant.

Other Legislation potentially relevant for assessment of clearing and planning/other matters:

- *Biodiversity Conservation Act 2016* (WA) (BC Act)
- *Conservation and Land Management Act 1984* (WA) (CALM Act)
- *Country Areas Water Supply Act 1947* (WA) (CAWS Act)
- *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act)
- *Planning and Development Act 2005* (WA) (P and D Act)
- *Soil and Land Conservation Act 1945* (WA)
- *Rights in Water and Irrigation Act 1914* (WA) (RIWI Act)
- *Aboriginal Heritage Act 1972* (WA).

Environmental Protection Policies:

- Environmental Protection (Peel Inlet - Harvey Estuary) Policy 1992
- Environmental Protection (Western Swamp Tortoise Habitat) Policy 2011.

Other relevant policies and guidance documents:

- Environmental Offsets Policy (Government of Western Australia, 2011)
- A guide to the assessment of applications to clear native vegetation (DER, 2014)
- Procedure: Native vegetation clearing permits (DWER, 2021)
- Environmental Offsets Guidelines (Government of Western Australia, 2014)
- Technical guidance – Flora and Vegetation Surveys for Environmental Impact Assessment (EPA, 2016)
- Technical guidance – Terrestrial Vertebrate Fauna Surveys for Environmental Impact Assessment (EPA, 2020)
- Approved conservation advice under section 266B of the EPBC Act for threatened flora/fauna/vegetation communities.

2 SCOPE AND METHODOLOGY ASSESSMENT OF CLEARING

Native vegetation will be cleared to accommodate this Proposal. This clearing will be undertaken using the Main Roads Statewide Clearing Permit CPS 818.

To comply with CPS 818, Main Roads must prepare a Clearing Assessment Report (CAR).

The CAR outlines the key activities associated with the Proposal, the existing environment and an assessment of native vegetation clearing. This assessment provides an evaluation of the vegetation clearing impacts associated with the Proposal using the ten Clearing Principles listed under s51 of the *Environmental Protection Act 1986* (EP Act) and strategies used to manage vegetation clearing.

2.1 Report Terminology and Sources

The following terms are used in this Clearing Report:

- **Project Indicative Clearing Footprint** – The maximum amount of native vegetation to be cleared for the Proposal that will accommodate the designed earthworks and with a modest buffer to allow for the safe movement of machinery during construction. The Project Indicative Clearing Footprint for this Proposal is 198 ha.
- **Project Development Envelope (PDE)** – The maximum extent within which the Project Indicative Clearing footprint will be located. This envelope is larger than the clearing footprint to allow for changes to the project as the design progresses, and to account for minor and unexpected changes that may occur during construction, such as working to avoid a large tree or encountering buried boulders or services. This flexibility allows the site personnel to make modifications to the project to avoid areas that may contain better environmental values. The CAR has assessed all environmental values within the PDE as though all the values will be impacted, up to the amount specified within the Project Indicative Clearing Footprint. The Project Development Envelope for this Proposal is 1,019 ha.
- **Study Area** – Area covered by the Desktop Assessment. The Study Area for the Proposal is confined to a local area of a 40 km radius.
- **Survey Area** – Area covered by the Biological Survey, which is typically larger than the Project Development Envelope.

2.2 Desktop Assessment

A desktop assessment of the Project Development Envelope was undertaken by viewing internal datasets and other government agency managed databases, and consulting with relevant stakeholders where necessary. Results from searches can be found in Appendix 2.

GIS layer viewing and mapping is done using ArcMap and/or Main Roads corporate mapping system known as iMaps. Referencing of the GIS layers accessed is done under the relevant methodology section of each clearing principle. Government managed databases were searched to locate additional information, which are found under References in Section 10.

2.3 Surveys and Assessments

A Biological survey conducted for the proposal is outlined in Table 2 and a summary of the findings in the report is presented in Sections 3.1.

Table 2. Summary of Biological and Targeted Surveys Relevant to the Proposal

Consultant and Survey Name	Survey Details
Ecoscape (Australia) Pty Ltd., (2025). GNH Plum Plains to Gogo Section Biological Survey, prepared for Main Roads Western Australia.	**Survey Area:** The survey area is comprised of the GNH Fitzroy to Gogo Section, the GNH Plum Plains to Fitzroy Section and the Ngurtuwarta Material Pit. The survey area occupies 1,955.1 ha and is located within the Shire of Derby-West Kimberley around the town of Fitzroy Crossing. The area up to 200 m either side of the survey area was considered as the 'Context Area' and a desktop assessment of 40 km radius of the survey area as the 'Study Area'. **Type:** A desktop assessment of the Study Area followed by a 'Detailed and Targeted flora and vegetation survey, and a Basic and Targeted terrestrial vertebrate fauna survey in accordance with Environmental Protection Authority (EPA) guidelines. **Timing:** The flora and vegetation survey was conducted between 23rd February – 3rd March and between 24th March – 1st April 2025. The terrestrial vertebrate fauna survey was conducted between 25th March – 1st April 2025. **Survey Results Shapefile TRIM Ref:** D25#828842 **Document TRIM Ref:** D25#828826

3 SURVEY RESULTS

In accordance with CPS 818 condition 8 (e) (iii), a copy of the relevant sections of the executive summary and report conclusions from the biological survey and/or field assessments are provided in Appendix 1.

Main Roads WA commissioned Ecoscape (Australia) Pty Ltd., in 2025 to undertake a detailed and targeted flora and vegetation survey and a basic and targeted vertebrate fauna survey for the larger 'GNH Plum Plains to Gogo Section' project. The Survey Area comprised of two road sections and a material pit as listed below, within the Shire of Derby-West Kimberley around the town of Fitzroy Crossing:

- GNH Fitzroy to Gogo Section, GNH SLK 2515.8 - 2552.5
- GNH Plum Plains to Fitzroy Section (including Fitzroy Airport), GNH SLK 2521.8
- Ngurtuwarta Material Pit, GNH SLK 2522.2.

The project proposed under this CAR applies to 'GNH Fitzroy to Gogo Section' between SLK 2515.8 - 2552.5.

3.1 Summary and Analysis of Flora and Vegetation Surveys

The purpose of the biological survey was to understand the environmental values of the survey area and the surroundings to support the environmental impact assessment documentation and approval process for Main Roads project.

Prior to undertaking the field surveys, an initial desktop assessment was completed for the Survey and Study Area. The key findings of the desktop assessment were:

- five pre-European vegetation associations intersect the Survey Area, each with greater than 99% of their statewide extent remaining.

- six Priority Ecological Communities (PECs) identified by the database search from within 40 km (the 'Study Area'); one of these, the Gogo Land System PEC, has been mapped within the Survey Area.
- 15 Priority-listed flora were identified as having been recorded within the study area by the database searches consisting of eight Priority 1, two Priority 2 and five Priority 3. None of the Priority Flora have been previously recorded within the Survey Area. Two P3 taxa (*Corchorus fitzroyensis* and *Goodenia sepalosa* var. *glandulosa*) were identified as being Likely to occur based on the information available during the desktop assessment.
- 45 conservation-listed fauna species were identified by the combined database searches (PMST and DBCA) within the Study Area including eight mammals, 30 birds, five reptiles and two other species of interest. Three of these species (*Malurus coronatus coronatus* [Purple-crowned Fairywren], *Pandion haliaetus* [Osprey] and *Hannia greenwayi* [Greenway's Grunter]) have been previously recorded within the Survey Area and a further five were assessed as 'may occur'.

The flora and vegetation field surveys were conducted during 23rd February – 3rd March and 24th March - 1st April 2025 following a period of above-average rainfall. The key outcomes and findings of the flora and vegetation field surveys from the 'GNH Fitzroy to Gogo Section' survey area were:

- 40 floristic quadrats established within the Survey Area.
- 296 vascular flora recorded from the Survey Area, including:
  - 3 conservation-listed flora: *Corchorus fitzroyensis* (P3), *Goodenia sepalosa* var. *glandulosa* (P3) and *Rothia indica* subsp. *australis* (P3).
  - 28 introduced flora including three Declared Pest Plants (**Azadirachta indica* [Neem Tree], **Calotropis procera* [Calotrope] and *Parkinsonia aculeata* [Parkinsonia]). Parkinsonia is also listed as a Weed of National Significance.
- 15 vegetation types from three landform types (low hills/slopes, plains, drainage lines) including
  - three vegetation types considered representative of the Gogo Land System PEC
  - one riparian vegetation type associated with drainage lines (**EcEa**) and three wetland vegetation types associated with floodplains (**Ae**, **Df** and **EcCf**).
- the vegetation condition ranged from Degraded (1.12%) - Poor (3.72%) – Good (64.77%) - Very Good (23.84%) – Excellent condition (0.31%). The main factors affecting vegetation condition were grazing pressure, the presence/abundance of weeds and historical clearing.

The fauna field survey was conducted during 24 March to 1 April 2025. The findings of the vertebrate fauna field surveys from the 'GNH Fitzroy to Gogo Section' survey area were:

- Six distinct habitat types were recorded from within the Survey Area: Open shrubland over tussock grassland, Open woodland over tussock grassland, Open/sparse woodland over hummock grassland, Grassland, Creek line, Seasonal waterbodies. None are considered of local or regional significance, and all are abundant in the landscape.
- 109 vertebrate fauna species; including three conservation-listed/of conservation interest: Yellow-lipped Cave Bat (DBCA – P2), Peregrine Falcon (DBCA – OS) and Rainbow Bee-eater (EPBC – MA).

4 DESKTOP ASSESSMENT OF VEGETATION

4.1 Desktop Vegetation Description

Ecoscape, (2025) mapped the PDE to consist of following vegetation types and other mapping units as shown in Figure 3a-3f:

- **Ae (PEC)** – *Astrebla elymoides* and *Chrysopogon fallax* mid tussock grassland.
- **AtAh** - *Acacia tumida* low woodland over *Carissa lanceolata* mid sparse shrubland over *Eragrostis eriopoda, Aristida hygrometrica* and *Chrysopogon fallax* mid tussock grassland.
- **CcTi –** *Corymbia cadophora* subsp. *cadophora* low open woodland over Triodia intermedia mid hummock grassland.
- **CgCf –** *Corymbia greeniana* and *Lysiphyllum cunninghamii* low open woodland over *Chrysopogon fallax*, *Sorghum stipoideum* and *Eragrostis eriopoda* mid tussock grassland.
- **CgClTw –** *Corymbia greeniana* low woodland over *Carissa lanceolata* mid sparse shrubland over *Triodia wiseana* mid hummock grassland.
- **CgCp –** *Corymbia greeniana* and *Lysiphyllum cunninghamii* low woodland over *Chrysopogon pallidus* and *Eriachne obtusa* mid tussock grassland.
- **CgTw –** *Corymbia greeniana* low open woodland over *Triodia wiseana* low hummock grassland.
- **EcCf (PEC) –** *Eucalyptus coolabah* low woodland over *Chrysopogon fallax*, *Dichanthium fecundum* and **Urochloa trichopus* mid tussock grassland.
- **EcEa (PEC) –** *Eucalyptus coolabah* mid woodland over *Eulalia aurea, Chrysopogon fallax* and *Urochloa trichopus* mid tussock grassland.
- **LcCf –** *Lysiphyllum cunninghamii* low woodland over *Chrysopogon fallax* and *Eriachne obtusa* mid tussock grassland.
- **LcClTw –** *Lysiphyllum cunninghamii, Grevillea striata* and *Atalaya hemiglauca* low open woodland over *Carissa lanceolata* mid sparse shrubland over *Triodia wiseana, Chrysopogon fallax* and *Eriachne obtusa* mid hummock/tussock grassland.
- **Ti –** *Triodia intermedia* low hummock grassland.
- **Waterbodies.**
- **Cleared.**

Table 3 below provides details of the vegetation types within the survey area, PDE and proposed clearing area:

Table 3. Summary of vegetation types and other mapping units within the PDE

Vegetation Type	Indicative Clearing (ha)	Extent within PDE (ha)	Total Extent within Survey and Context Area (ha)
Ae (PEC)	21.70	91.92	162.41
AtAh	20.0	69.40	167.14
CcTi	2.70	3.56	27.38
CgCf	-	7.51	57.45
CgClTw	11.23	39.89	171.32

CgCp	0.60	23.8	123.52
CgTw	7.84	60.58	130.59
EcCf (PEC)	98.05	506.90	817.41
EcEa (PEC)	6.10	31.27	77.13
LcCf	15.70	60.82	233.02
LcClTw	-	3.65	14.80
Ti	13.50	57.51	160.55
Water	0.40	6.11	7.85
Cleared	-	55.8	-
Total	**198 ha**	**1019 ha**	

Table 4 provides details of the representation of remaining extents of the remnant vegetation associations in the PDE.

Table 4. Pre-European Vegetation Representation

Pre-European Vegetation Association	Scale	Pre–European Extent (ha)	Current Extent (ha)	% Remaining	% Current Extent in DBCA Managed Land (proportion of pre-European Extent)
Veg Assoc No. 61 described as "Grasslands, tall bunch grass savanna woodland, coolabah over ribbon grass (*Crysopogon spp.*)"	**Statewide**	185,472.52	185,315.67	99.92	0.55
	IBRA Bioregion Dampierland	130,880.70	130,785.16	99.93	0.77
	IBRA Sub-region Fitzroy Trough	130,664.11	130,568.56	99.93	0.77
	Local Government Authority Shire of Derby–West Kimberley	182,467.61	182,310.76	99.91	0.55
Veg Assoc No. 569 described as "Hummock grasslands, low tree steppe; bloodwood over soft spinifex & *Triodia wiseana*"	**Statewide**	101,470.94	101,242.00	99.77	2.17
	IBRA Bio region Ord Victoria Plain	29,036.42	28,824.80	99.27	-
	IBRA Sub-region South Kimberley Interzone	29,036.42	28,824.80	99.27	-
	Local Government Authority Shire of Derby–West Kimberley	37,075.63	36,846.69	99.38	5.94
Veg Assoc No. 699 described as "Shrublands, pindan; *Acacia eripoda* shrubland with scattered low	**Statewide**	1,986,450.05	1,984,438.78	99.90	0.47
	IBRA Bio region Dampierland	1,976,313.50	1,974,958.06	99.93	0.48
	IBRA Sub-region Fitzroy Trough	180,118.58	179,963.89	99.91	-

Pre-European Vegetation Association	Scale	Pre–European Extent (ha)	Current Extent (ha)	% Remaining	% Current Extent in DBCA Managed Land (proportion of pre-European Extent)
bloodwood (*Eucalyptus dicromophloia*) & *E. setosa* over soft & curly spinifex on sandplain"	**Local Government Authority** Shire of Derby–West Kimberley	357,807.33	357,647.25	99.96	-
Veg Assoc No. 709 described as "Hummock grasslands, shrub steppe; *Acacia impressa* over *Triodia intermedia* on stony laterite"	**Statewide**	75,847.16	75,617.75	99.70	0.74
	IBRA Bio region Dampierland	61,628.23	61,398.83	99.63	0.91
	IBRA Sub-region Fitzroy Trough	61,628.23	61,398.83	99.63	0.91
	Local Government Authority Shire of Derby–West Kimberley	74,958.59	74,729.18	99.69	0.75

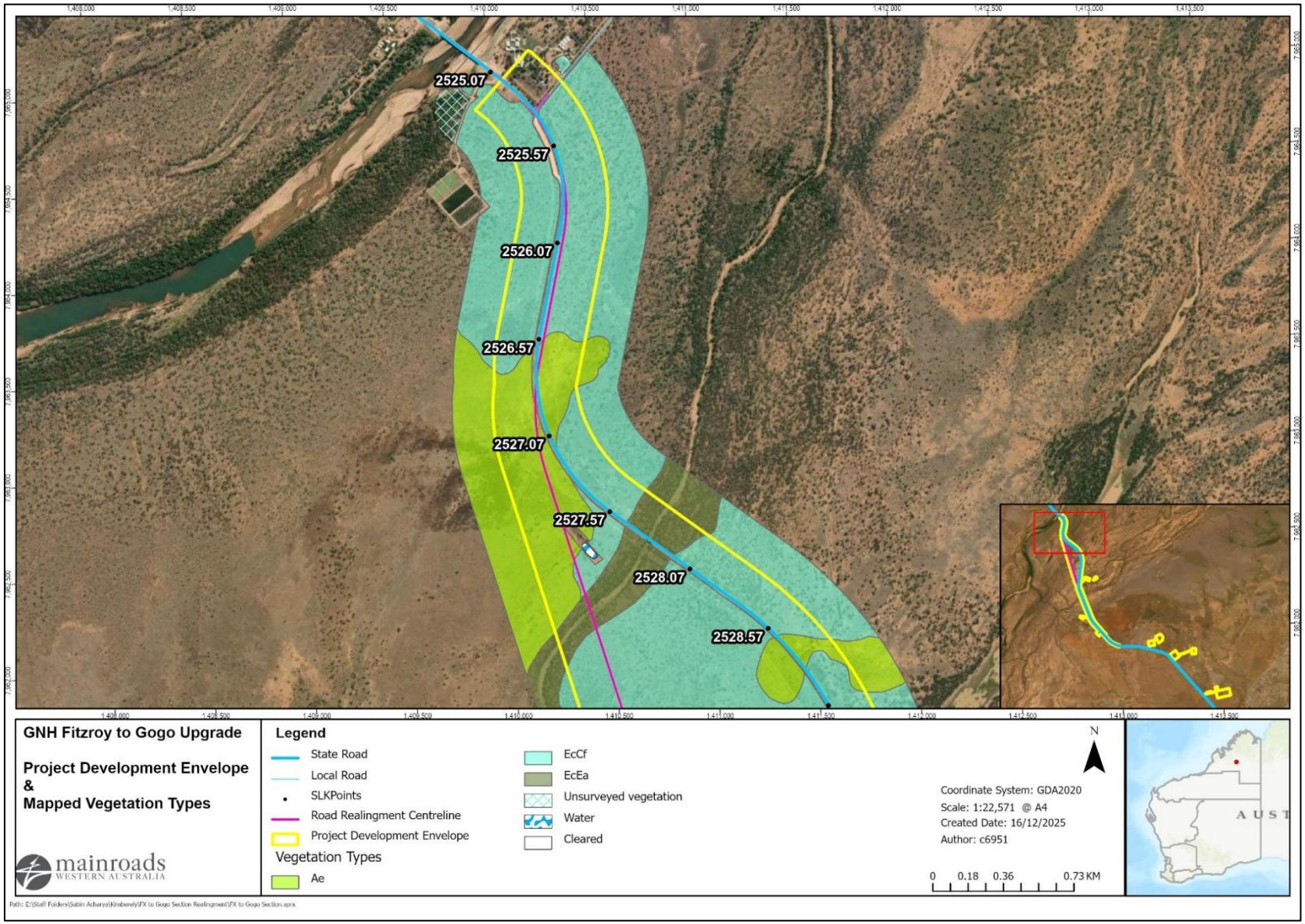


Figure 3a. Project Development Envelope and Mapped Vegetation Types

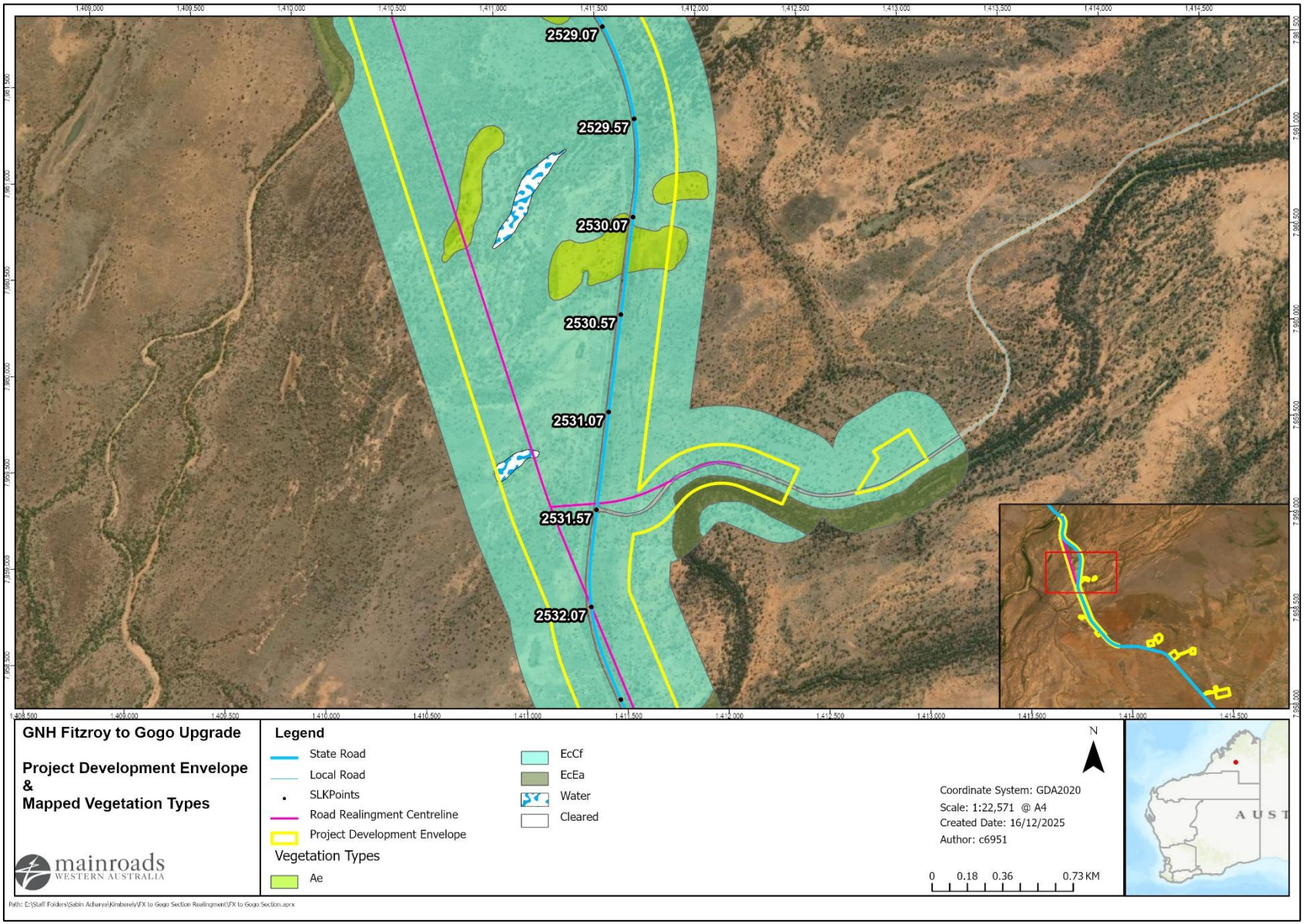


Figure 3b. Project Development Envelope and Mapped Vegetation Types

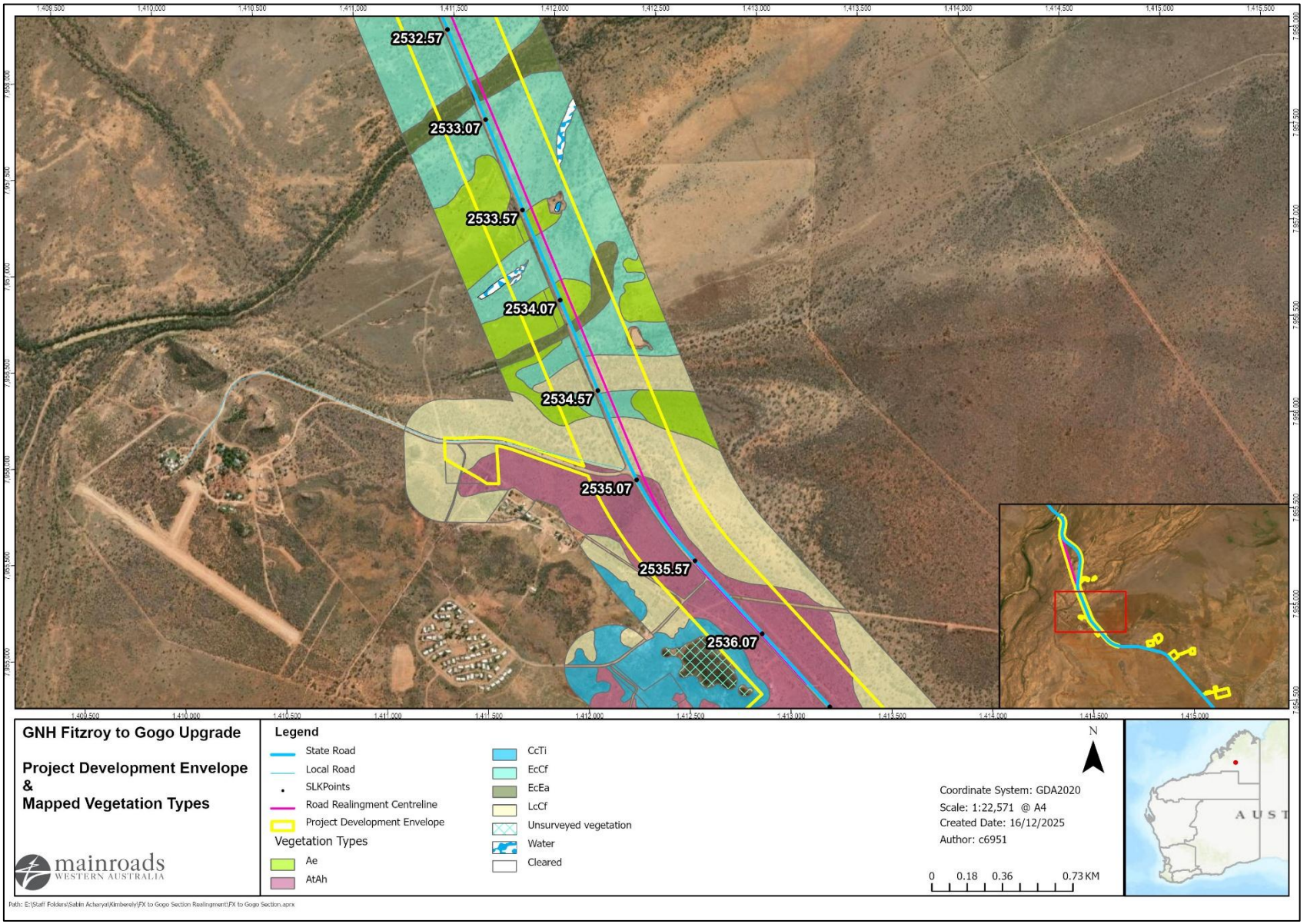


Figure 3c. Project Development Envelope and Mapped Vegetation Types

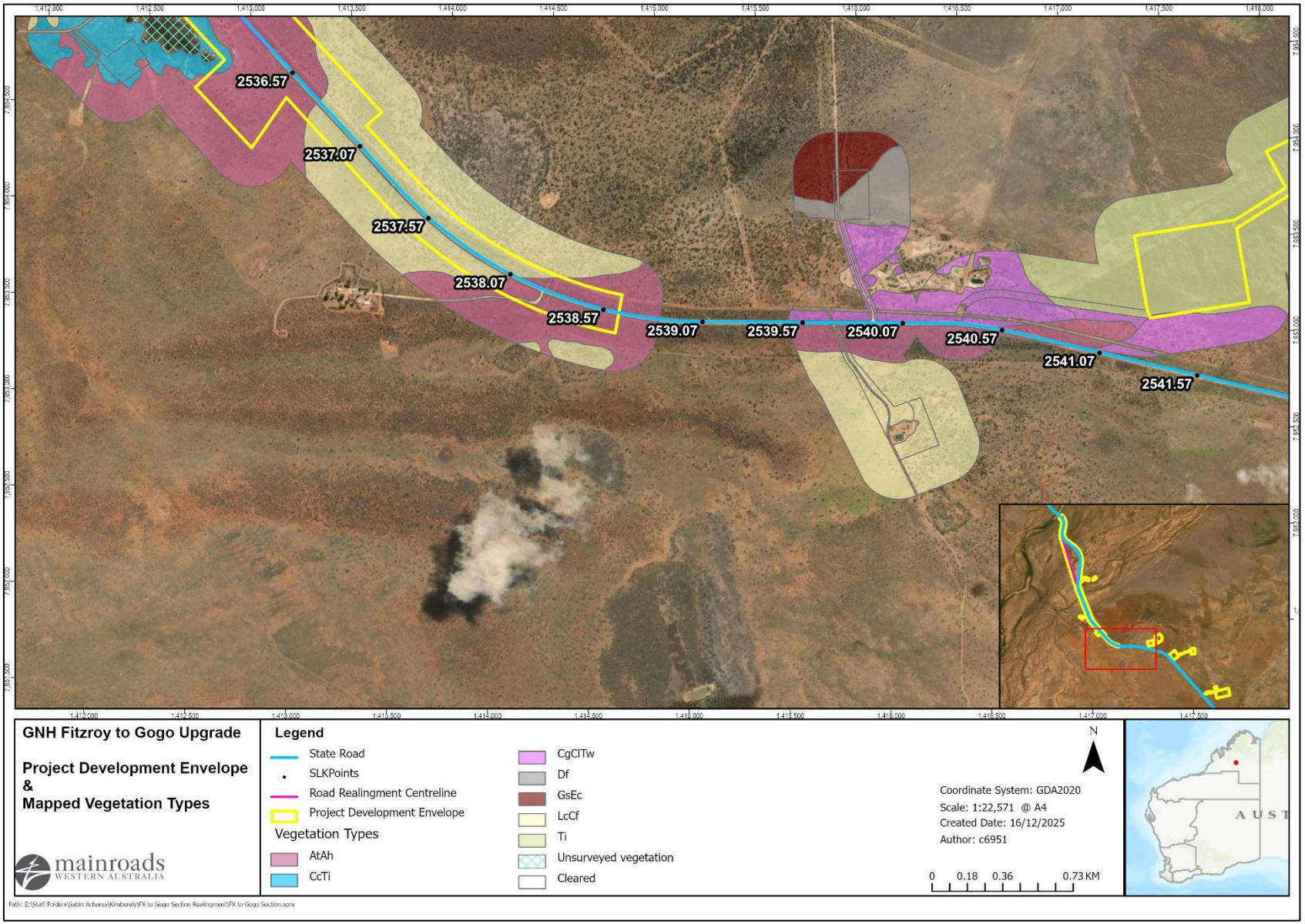


Figure 3d. Project Development Envelope and Mapped Vegetation Types

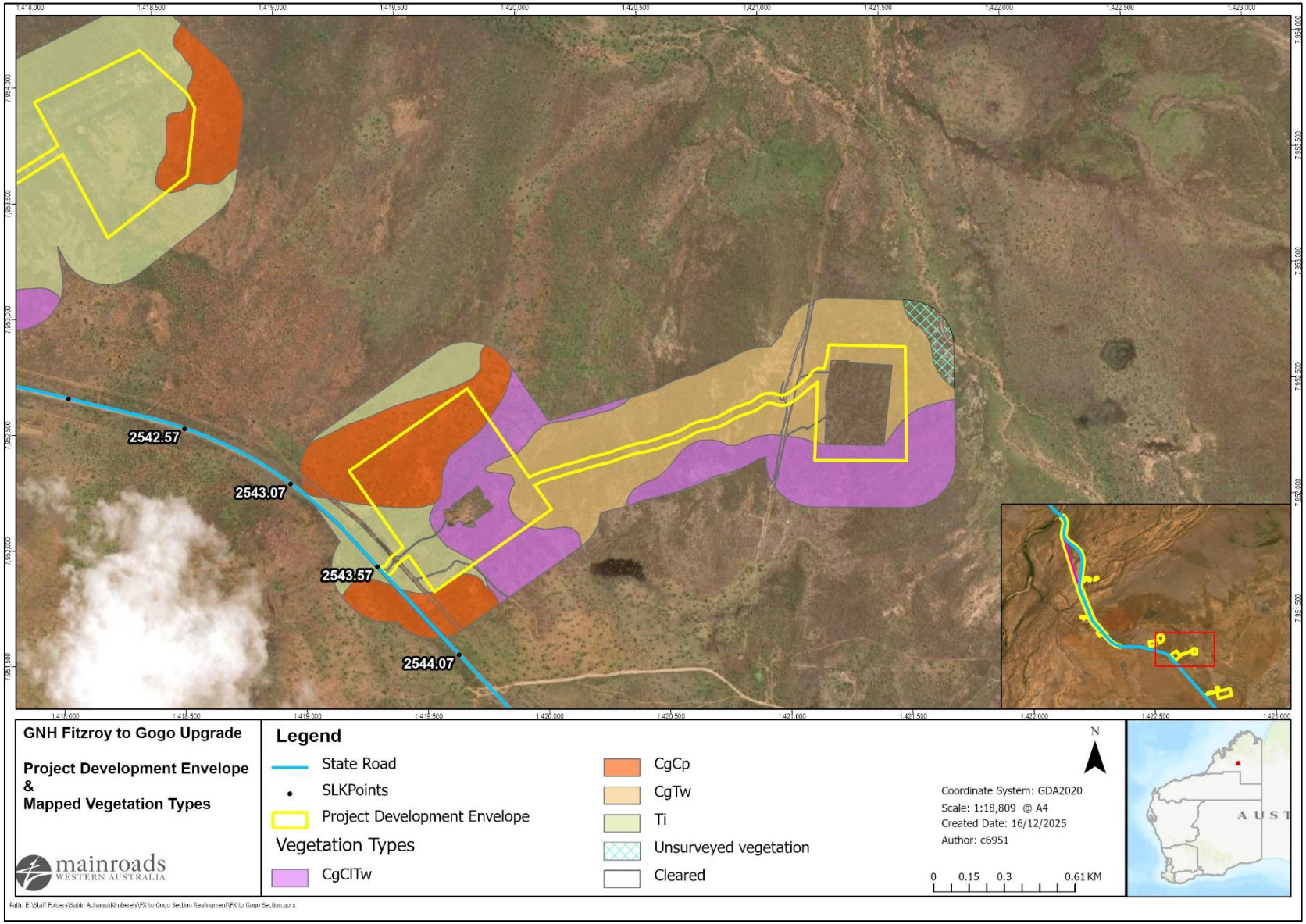


Figure 3e. Project Development Envelope and Mapped Vegetation Types

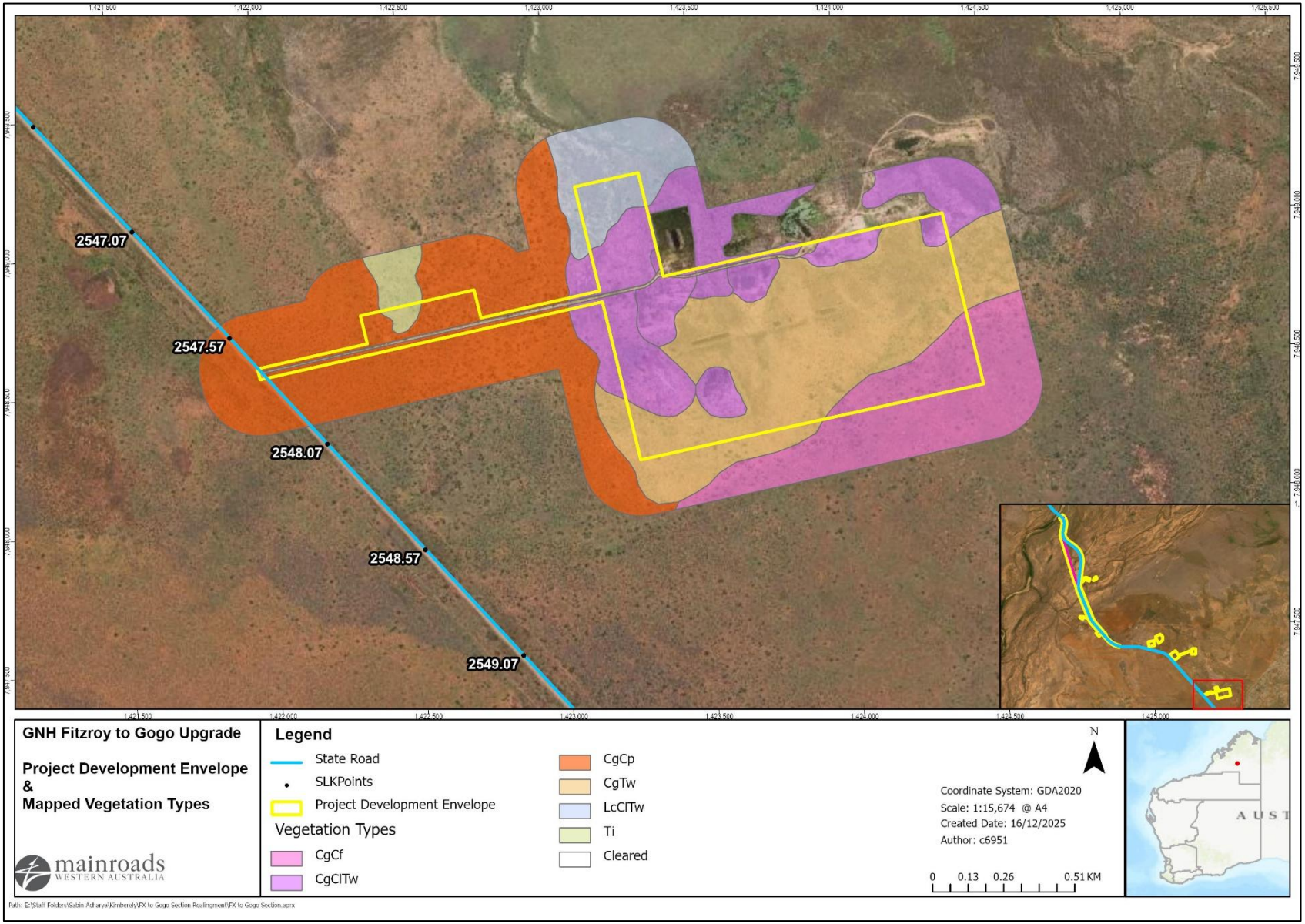


Figure 3f. Project Development Envelope and Mapped Vegetation Types

5 ASSESSMENT AGAINST THE TEN CLEARING PRINCIPLES

In assessing whether the Proposal's proposed clearing is likely to have a significant impact on the environment, the Proposal was assessed against the ten Clearing Principles (EP Act, Schedule 5).

Each principle has been assessed in accordance with the former Department of Environment Regulation (now Department of Water and Environmental Regulation (DWER) '*A Guide to the Assessment of Applications to Clear Native Vegetation*' (Department of Environment Regulation, 2014) and other relevant clearing permit application decision reports prepared by DWER.

The proposed clearing is at variance to Principle (f) and is not at variance, or not likely to be at variance, with the remaining Clearing Principles.

(a) Native vegetation should not be cleared if it comprises a high level of biological diversity.

Proposed clearing is not likely to be at variance to this Principle.

Vegetation and Ecological Communities

No Threatened Ecological Communities (TECs) were identified from the project 40 km radius (Study Area) nor were any TECs recorded by Ecoscape (2025) from the PDE or the larger survey area.

Ecoscape (2025) recorded twelve vegetation types from the PDE (see section 4.1 and Table 3) ranging from Very Good-Good-Poor-Degraded condition. These vegetation types were well represented within the 200 m context area, were broadly aligned with the pre-European vegetation associations and local Land Systems and as such were not considered locally or regionally significant (Ecoscape, 2025).

Three vegetation types - **Ae, EcCf** and **EcEa** were identified as representative of the Priority 3 Gogo Land System Priority Ecological Community (PEC) corresponding with floodplains of the Fitzroy River and drainage channels. Vegetation types of the Gogo Land System PEC comprised 1,056.95 ha of the survey and context area, of which 630.09 ha occurs in the PDE. The design footprint indicates that approximately 125.85 ha of this PEC (11.9 % of the total PEC recorded in the Survey Area) occurs within the indicative clearing footprint. Ecoscape (2025) reported that the distribution of these vegetation types aligned with the existing desktop mapping of the Gogo Land System and the corresponding PEC in the region. Approximately 71, 414.31 ha of the Gogo Land System PEC has been mapped by DBCA within the project's 40 km radius (Study Area), of which 125.85 ha is proposed to be cleared under this proposal, equating to approximately 0.17 % of this land system within the Study Area. The Gogo Land System PEC extends beyond the project's Study Area which suggests that the impact to this PEC as a result of the proposed clearing is unlikely to be significant in a local or regional context.

Flora

No Threatened flora species were identified from the project Study Area nor were any recorded or considered likely to occur in the PDE during the Detailed and Targeted Flora survey by Ecoscape (2025).

Ecoscape (2025) recorded two Priority flora species from the PDE as discussed below:

Corchorus fitzroyensis **(P3)** – The field survey recorded a total of 4,833 individuals from the survey and context area of which 3,124 individuals occurred within the PDE. Not all the individuals within the PDE will be required to be cleared. The design footprint indicates that 456 individuals (9.4% of the total recorded) occur within the indicative clearing footprint. The species was recorded from a variety of habitats including cracking clay plains, floodplains, plains, sandplains and drainage lines in vegetation types of **Ae, EcCf, EcEa** and **LcCf**, and cleared/not vegetated areas. There are known previous records of the species across the Central Kimberley and Dampierland regions, with an overall distribution of approximately 110 km (north south) by 245 km (east-west) (Ecoscape, 2025). Suitable habitat is widespread outside the survey area, and

it is therefore considered unlikely that the proposed clearing will significantly impact this taxon in a local or regional context.

***Goodenia sepalosa* var. *glandulosa* (P3)** – According to the Western Australian Herbarium (1998-), this taxon is a prostrate to sprawling herb, 0.03 – 0.3 m high with yellow flowers (mainly April to July). The species' habitat preferences are broad, being described as red sand or loam. It has been recorded in four IBRA bioregions (Central Kimberley, Dampierland, Northern Kimberley and Victoria Bonaparte), largely from Broome to Fitzroy Crossing (a distance of approximately 400 km). *Goodenia sepalosa* var. *glandulosa* was recorded from six populations throughout the Survey Area, including proposed road sections and the proposed material pits, with a total of 155 plants. Of the 155 plants, 83 occur within the PDE, however none occur within the indicative clearing footprint. This species was recorded from the **AtAh, CgCf and CgCp** vegetation types from the PDE and several other vegetation types from survey area associated with variety of plains. As such, it is not restricted to the vegetation types within the PDE. Suitable habitat is widespread outside the survey area, and it is therefore considered unlikely that the proposed clearing will significantly impact this taxon in a local or regional context.

***Rothia indica* subsp. *australis* (P3)** – According to the Western Australian Herbarium (1998-), this taxon is a prostrate annual herb to 0.3 m high. It flowers from April to August and is known to occur on sandy soils, sandhills and sandy flats. It has been recorded in four IBRA bioregions (Dampierland, Great Sandy Desert, Pilbara and Victoria Bonaparte). *Rothia indica* subsp. *australis* was recorded from four populations from 83 plants within the Survey Area, plus an additional 161 plants in the context area (244 plants in total). Of the 244 plants, none occur within the PDE. The nearest population recorded was approximately 250 m from the PDE in **AtAh** and **CcTi** vegetation types. The other populations were recorded from several other vegetation types that do not occur in the PDE. The record of this species within the survey area represents a range infill, approximately 220 km from the closest known record. Considering the relatively low number of plants recorded, extensive suitable habitat outside the PDE and large known range of the species, it is unlikely that the proposed clearing will significantly impact this taxon in a local or regional context.

Post-survey Likelihood of Occurrence

Ecoscape (2025) undertook a post-survey likelihood of occurrence assessment of the conservation-listed flora taxa identified in the desktop review, taking into account the vegetation condition, habitat availability and search effort. The assessment did not identify any taxa other than those recorded as likely to occur within the PDE, largely due to extensive survey effort undertaken during the optimal timeframe. Only one species listed below was considered as 'may occur' within the PDE.

***Euploca foveolata* (P1)** – The nearest known record of this species is more than 1.7 km from the PDE, recorded in 1952. The preferred habitat for the species is sandy clay or loam, seasonally inundated flats, riverbanks and floodplains (Ecoscape, 2025). The PDE occurs within a floodplain area and as such the species was considered as may occur. However, the preferred habitat for the species occurs widely outside the PDE across the Fitzroy River catchment and it is unlikely the proposed clearing would significantly impact the species or its distribution.

Fauna

Ecoscape, (2025) identified six broad fauna habitat types from the PDE which were typical for the local area and representative of the Fitzroy Trough IBRA subregion. These habitats were not of a particular local or regional significance and were not restricted to the PDE, rather they seemed to occur throughout the survey area and beyond (Ecoscape, 2025). Important habitats for roosting and nesting, such as caves and tree hollows, were not observed by Ecoscape (2025). Fauna habitats in the PDE are unlikely to comprise a high level of biodiversity in comparison to surrounding uncleared areas both locally and regionally. The significance of habitats for fauna species is described in detail in Principle (b).

Summary

There are no known conservation areas, significant wetlands or environmentally sensitive areas within the PDE. The pre-European native vegetation associations are widespread locally and regionally. The assemblage

of flora and fauna species is not unique to the area with broad representation beyond the PDE (Ecoscape, 2025). The clearing footprint indicates that approximately 456 individuals (9.4 % of the total recorded) of *Corchorus fitzroyensis* (P3) will be required to be cleared. There are known previous records of *Corchorus fitzroyensis* across the Central Kimberley and Dampierland regions, with an overall distribution of approximately 110 km (north-south) by 245 km (east-west) (Ecoscape, 2025). Suitable habitat is widespread outside the PDE, and it is therefore considered unlikely that the proposed clearing will significantly impact this taxon in a local or regional context. Three non-perennial watercourses; Blue Bush Creek, Two Mile Creek and an unnamed creek, and some minor drainage lines intersect the PDE. Three riparian and wetland vegetation types associated with the drainage lines and floodplains and the Gogo Land System PEC occur within the PDE and approximately 125.85 ha of these vegetation types are required to be cleared. Potential impacts to watercourses, floodplains and associated habitat are not expected to notably impact local or regional biodiversity, considering a majority of the Fitzroy River catchment (9.4 million ha), both upstream and downstream of the PDE, remains uncleared.

Based on the above, the proposed clearing is not likely to be at variance to this Principle.

Methodology

- DCCEEW (2024b)
- DCCEEW (2025)
- DWER (2023)
- Ecoscape (2025)
- Government of Western Australia (2019)
- Western Australian Herbarium (1998-)
- Government GIS Shapefiles (Accessed 23/12/2025):
  - DBCA Threatened and Priority Ecological Community database search
  - DBCA Threatened and Priority flora database search
  - DBCA Threatened and Priority fauna database search
  - Pre-European vegetation
  - DBCA Legislated Lands and Waters
  - Directory of Important Wetlands in Australia
  - Ramsar Sites
  - Watercourses
  - Hydrography Linear (Hierarchy) (DWER-031)

(b) Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna.

Proposed clearing is not likely to be at variance to this Principle.

Fauna Habitat

As per the list below and Table 5, six broad fauna habitat types were identified from the PDE (Ecoscape, 2025):

- Open shrubland over tussock grassland – Open shrubland dominated by *Lysiphyllum* (Bauhinia) and *Acacia* (Wattle) over an understorey of *Triodia* (Spinifex) and *Chrysopogon* (Golden Beard Grass) hummock/tussock grassland. Soil clay / clay loam and sand undulating plain with minimal litter cover.
- Open Woodland over Tussock Grassland – Low open woodland dominated by *Eucalypts* over an understorey of *Chrysopogon* (Golden Beard Grass) closed tussock grassland Soil clay with no to little litter cover. Subject to seasonal inundation.
- Open / sparse woodland over hummock grassland – Open/sparse woodland or scattered Eucalypt trees (*Eucalyptus* and or *Corymbia spp*.) over hummock grassland. Sandy/gravelly substrate on plains or gentle undulating country.
- Grassland – Tussock grassland (*Chrysopogon*/*Sorghum*) on clay/loam substrate. Density variable based on fire age. Generally associated with floodplains. Occasional low rises or drainage lines with scattered shrubs or *Triodia* (Spinifex).
- Creek line – Two Mile Creek, Blue Bush Creek and another unnamed minor drainage line surrounded by *Corymbia, Eucalyptus* and *Melaleuca* over an understorey of tussock grassland (dominated by *Chrysopogon* and *Eulalia*) / low forbland. Soil clay with no to little litter, rocky in some areas.
- Seasonal Waterbodies – Naturally occurring seasonally inundated waterbodies surrounded by open woodland over tussock grassland.

Table 5. Extent of fauna habitats within the PDE

Habitat Type	Indicative Clearing (ha)	Extent within PDE (ha)	Total Extent Mapped within the Survey Area (ha)
Open shrubland over tussock grassland	20.0 (4.15%)	69.40	481.83
Open woodland over tussock grassland	114.34 (13.31%)	599.03	858.42
Open / sparse woodland over hummock grassland	35.25 (16.64%)	165.20	211.73
Grassland	21.70 (7.79%)	91.92	278.24
Creek line	6.10 (19.48%)	31.27	31.30
Seasonal waterbodies	0.40 (6.54%)	6.10	6.11
Cleared Areas	-	55.8	87.46
Total	**197.79 ha**	**1018.72**	**1955.1**

The fauna habitat types recorded from PDE are typical for the local area and representative of the Fitzroy Trough IBRA subregion. These habitats are not of a particular local or regional significance and are not restricted to the PDE, rather they occur throughout the survey area and beyond (Ecoscape, 2025).

Fauna

The Basic and Targeted terrestrial vertebrate fauna survey by Ecoscape (2025) recorded the following conservation significant vertebrate fauna taxa from the PDE during the field survey:

Vespadelus douglasorum **(Yellow-lipped Cave Bat) – P2 DBCA status**

The Yellow-lipped Cave Bat is restricted to the Kimberley region but is widespread within this region. Very little is known about this species and its habitat requirements other than it forages over riparian habitat and roosts in limestone caves in small colonies. This species was recorded from one location from an existing material pit in an 'Open / sparse woodland over hummock grassland' habitat type (Ecoscape 2025). There are six known records within the Study Area, more than 20 km from the PDE, recorded between 1976 - 1981 mostly along the Fitzroy River. It is likely that this bat species is not common in the area and may use the PDE for foraging only, as the caves it requires for roosting and breeding do not occur in the PDE and more suitable habitat such as Fitzroy River and its tributaries occur nearby (Ecoscape, 2025).

Falco peregrinus **(Peregrine Falcon) – OS DBCA status** – A single Peregrine Falcon was observed during the field survey on the 'Open woodland over tussock grassland habitat' type. There are two historic (> 25 years) DBCA records within the Study Area. The species is not common in the area but wide-ranging throughout Australia, not restricted to any one habitat but prefers areas with rocky ledges, cliffs, watercourses, open woodland, or margins with cleared land (Ecoscape, 2025). Foraging habitat for this species occurs throughout the survey area, however, suitable breeding habitat is limited. The species would likely only be transient and not dependent on any resources occurring in the survey area or PDE.

Merops ornatus **(Rainbow Bee-eater) – MA EPBC status –** Rainbow Bee-eaters are habitat generalists occurring in a broad range of habitats including open woodlands, shrublands, riparian vegetation, inland and coastal dune systems, and often, but not always, located near water. They have almost Australian-wide distribution (Ecoscape, 2025). The species was observed and heard throughout the survey area from most habitat types. Given the species is a habitat generalist and has broad distribution range, it is unlikely to be dependent upon habitats within the PDE.

Tiliqua scincoides intermedia **(Northern Blue-tongue Skink)** – **CR EPBC, P4 DBCA status** – The Northern Blue-tongue Skink was recorded in the field survey (more than 4 km from the PDE) within the 'Open Shrubland over Tussock Grassland' and 'Grassland' habitat type. The species is a large skink distributed across a diverse range of habitats. It has been documented in various ecosystems and geology, including sand plains, sandy watercourses, swamps, cracking clay floodplains and coastal flats. The species is also associated with a wide array of vegetation types from riparian forests to monsoon rainforests, eucalypt woodlands and as well as both spinifex and tussock grasslands. The Northern Blue-tongue Skink was listed as CR in 2023 due to an ongoing and severe population decline, which is predicted to continue as the Cane Toad expands throughout its range. Cane Toads have been recorded in the broader Fitzroy area (Ecoscape, 2025). It is likely to occur sparsely within the PDE and at a similar density in suitable habitat that occurs widely throughout the region. Management actions included in the VMP (Appendix 3) will allow individuals of this species to naturally move into adjacent areas of habitat, thereby minimising injury and mortality to individuals. Furthermore, clearing will not be undertaken during peak activity or breeding season for this species (November to January), further reducing the likelihood of significant impacts.

Post-survey Likelihood of Occurrence

Ecoscape (2025) undertook a post-survey likelihood of occurrence assessment for the significant fauna species identified in the desktop review and identified following as 'may' occur in the PDE based on the species' habitat requirement and previous records:

Malurus coronatus coronatus **(Purple-crowned Fairy Wren) (EN)** – The species occurs patchily within the Kimberley region, inhabiting dense riparian vegetation (Ecoscape, 2025). They breed in fringing river systems (within 20 m of permanent water or swamps) in a dense, permanent riparian vegetation, requiring thick undergrowth of *Pandanus* (screw-palm) or tall, dense river grasses like *Chionachne cyanthopoda*, with

emergent *Eucalyptus/Melaleuca* for flood refuge, nesting in shrubs or grass clumps near water for food and shelter (Thomas, 2013) & (DCCEEW, 2025). There are known DBCA records within the PDE and several records within the Study Area, mostly along the Fitzroy River. The species was assessed as 'may occur' given it is likely be accessing the PDE for foraging purposes only as more suitable breeding habitat is located outside the PDE along the Fitzroy River.

Saccolaimus saccolaimus nudicluniatus **(Bare-rumped Sheath-tailed Bat) (P3)** – The species roosts in deep tree hollows and caves and forages above tree canopies (Ecoscape, 2025). There are no known records within the project 40 km radius. Even if present, the Bare-rumped Sheath-tailed Bat is unlikely to roost within the PDE due to lack of suitable trees or caves. As a wide-ranging forager it may utilise the PDE for foraging purposes on occasion but would not be dependent on the habitat within it, given foraging habitat is abundantly available beyond the PDE (Ecoscape, 2025).

Pandion haliaetus **(Osprey) (MI)** – Ospreys feed mainly on fish and are found throughout Australia in association with coastal or terrestrial wetland habitat (Ecoscape, 2025). There are known DBCA records within the PDE and several records within the Study Area, mostly along the Fitzroy River. The Fitzroy River adjacent to the PDE provides preferred habitat for foraging and breeding, thus, this species is classified as 'May' occur although they are more likely to be an occasional visitor, overflying the PDE for foraging purpose only.

Plegadis falcinellus **(Glossy Ibis) (MI)** –The Glossy Ibis is a small or mid-sized ibis with wide distribution across Australia feeding in shallow water consuming invertebrates and nests in colonies in fresh or brackish wetlands with dense emergent vegetation (Ecoscape, 2025). They are common in the Kimberley during and after the wet season, occasionally occurring in large numbers of up to 4,000. Preferred habitat includes shallow freshwater wetlands and adjacent flats, river pools and flooded samphire (Biota, 2025). There are known DBCA records within the PDE and several records within the Study Area as close as 400 m from the PDE. The suitable habitat exists within the PDE in association with major and minor drainages, particularly in the wet season during periods of heightened water level of drainages and inundation of flood plains. The Glossy Ibis is known to breed at only a limited number of locations within Australia, mostly in Murray Darling Basin in northern New South Wales. In Western Australia, they breed at the lower Ord/Keep Rivers and some isolated small breeding colonies in the south-west (DCCEEW, 2025). The Fitzroy River and immediate surroundings provide habitat for foraging but are not known to provide breeding habitat for the species. Since the on-ground works are proposed to be undertaken in the dry season, the species is unlikely to be impacted by the proposed clearing.

Rhinonicteris aurantia **(Orange Leaf-nosed Bat) (P4)** – This species utilises underground roosts such as limestone caves, tree hollows and forages in a variety of habitats (Ecoscape, 2025). There are known records within the project 40 km radius, more than 16 km from the PDE. The species may utilise the PDE for foraging but is unlikely to be dependent on the habitats in it given the lack of caves and tree hollows for roosting and abundance of foraging habitat beyond the PDE.

Pristis pristis **(Freshwater Sawfish) (EN)** – The Freshwater Sawfish prefers sandy or muddy bottom habitats of shallow coastal waters, estuaries, river mouths, freshwater rivers and lakes. The species spends its first four to five years in freshwater, after which it moves into marine habitats after the wet season and then back into freshwater habitats to breed during the wet season. In the north of Western Australia, the most significant habitat for the Freshwater Sawfish is the marine waters of King Sound and the freshwater habitats of the Fitzroy River. The Freshwater Sawfish has been recorded from several locations in the Fitzroy River as far inland as Margaret River Gorge, which is about 400 km upstream from the river mouth. The Fitzroy River has also been noted for its high abundance of Freshwater Sawfish (AECOM, 2011). The PDE occurs within the Fitzroy River floodplain, with non-perennial watercourses and drainage lines intersecting the project area. As such, Freshwater Sawfish juveniles and adults may possibly utilise the PDE during the wet season when the water levels are high. However, since clearing and construction activities will be limited to the dry season, it is unlikely that clearing will impact significant habitat for Freshwater Sawfish.

Based on the above, the proposed clearing is not likely to be at variance to this Principle.

Methodology

- AECOM (2011)
- Biota (2025)
- DCCEEW (2024b)
- DCCEEW (2025)
- Ecoscape (2025)
- Thomas (2013)
- Government GIS Shapefiles (Accessed 23/12/2025):
  - DBCA Threatened and Priority fauna database search

(c) Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora.

Proposed clearing is not at variance to this Principle.

A desktop database search identified no known records of Threatened flora species within a 40 km radius of the PDE.

No Threatened flora species, listed pursuant to the *Biodiversity Conservation Act 2016*, were recorded during the Detailed and Targeted Flora survey of the PDE and none were considered likely to occur (Ecoscape, 2025).

Based on the above, the proposed clearing is not at variance to this Principle.

Methodology

- Ecoscape (2025)
- Government GIS shapefiles (Accessed 22/12/2025):
  - DBCA Threatened flora database search

(d) Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of a threatened ecological community.

Proposed clearing is not at variance to this Principle.

The desktop database searches identified no known records of any Threatened Ecological Communities (TECs) within the project's 40 km radius Study Area.

The flora and vegetation field survey by Ecoscape (2025) did not record any vegetation communities within the PDE that correspond to any state (BC Act), or Commonwealth (EPBC Act) listed Threatened Ecological Communities (TECs).

Based on the above, the proposed clearing is not at variance to this Principle.

Methodology

- Ecoscape (2025)
- Government GIS shapefile(Accessed 22/12/2025):
  - DBCA Threatened Ecological Community database search

(e) Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.

Proposed clearing is not at variance to this Principle.

The National Objectives and Targets for Biodiversity Conservation recognise that the retention of 30% or more of the pre-clearing extent of each ecological community is necessary if Australia's biological diversity is to be protected (Commonwealth of Australia, 2001) except in constrained areas (Perth and Peel) where 10% representation should be maintained.

As shown in Table 4, the pre-European Vegetation Associations within the PDE are mapped as Vegetation Associations 61, 569, 699 and 709, of which over 99 % of the pre-European extent remains intact at all levels (State, IBRA Bioregion, IBRA Subregion and LGA scales) (Government of Western Australia, 2019). The PDE is not located in an area that has been extensively cleared, rather the vegetation associations are widespread throughout the area and well-represented locally and regionally.

Based on the above, the proposed clearing is not at variance to this Principle.

Methodology

- Commonwealth of Australia (2001)
- Government of Western Australia (2019)
- Government GIS shapefiles (Accessed 22/12/2025):
  - Pre-European vegetation

(f) Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.

Proposed clearing is at variance to this Principle.

The biological survey by Ecoscape (2025) recorded one riparian vegetation type associated with drainage lines (**EcEa**) and two wetland vegetation types associated with floodplains (**Ae** and **EcCf**) from the PDE. Table 6 below provide the details of the extent of these vegetation types within the indicative clearing footprint in relation to the PDE and survey area:

Table 6. Extent of riparian and wetland vegetation types within the PDE

Vegetation Types	Indicative Clearing (ha)	Extent within PDE (ha)	Total Extent within the Survey Area (ha)
EcEa – *Eucalyptus coolabah* mid woodland over *Eulalia aurea, Chrysopogon fallax* and *Urochloa trichopus* mid tussock grassland.	6.10 (7.9 %)	31.27	77.13
Ae – *Astrebla elymoides* and *Chrysopogon fallax* mid tussock grassland.	21.70 (13.36 %)	91.92	162.41
EcCf – *Eucalyptus coolabah* low woodland over *Chrysopogon fallax*, *Dichanthium fecundum* and **Urochloa trichopus* mid tussock grassland.	98.05 (11.99 %)	506.90	817.41
Total	**125.85 (11.90 %)**	**630.09**	**1,056.95**

Approximately 630 ha of the PDE is mapped as consisting of vegetation growing in, or in association with, an environment associated with a watercourse or wetland. Based on the project indicative clearing footprint, up to 125.85 ha of vegetation growing in association with a watercourse or wetland is proposed to be cleared for project activities. As such, the proposed clearing is at variance to this Principle.

The vegetation growing in, or in association with, an environment associated with a watercourse or wetland within the PDE is not part of a RAMAR or Nationally important wetland or Threatened Ecological Community (GIS Databases). As discussed in Clearing Principle (a), vegetation types **EcEa**, **Ae** and **EcCf** are associated with the Gogo Land System Priority 3 Priority Ecological Community (PEC). However, there is over 71,400 ha of this PEC mapped as occurring in the 40 km radius Study Area and impacts from the proposed clearing are therefore unlikely to be locally or regionally significant. As described by DBCA (2023), the Gogo Land System PEC is threatened by threatening processes acting at landscape scales, such as agricultural expansion, weed invasion (buffel), altered fire regimes and over grazing leading to soil loss and loss of vegetation structure. The proposed clearing will not exacerbate these landscape scale threats.

Methodology

- DBCA (2023)
- Ecoscape (2025)
- Government GIS shapefiles (Accessed 23/12/2025):
  - Directory of Important Wetlands in Australia - Western Australia (DBCA-045)
  - Surface_HydroLines_Regional (Geoscience Australia)

(g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.

Proposed clearing is not likely to be at variance to this Principle.

Five soil landscape systems were mapped over the PDE:

- **Camelgooda System** – described as "Extensive dunefields, pindan and other low woodlands."
- **Gogo System** – described as "Active floodplains with broad levee zones and moderately extensive back plains of cracking clays with grasslands and grassy woodlands."
- **Neillabublica System** – described as "Undulating limestone country with scattered low hills and cracking clay plains. Open grassy woodlands, grasslands, and spinifex."
- **St George system** – described as "Sandstone plateau and hill lands with open spinifex and stunted trees, and pindan on the intervening sandplain."
- **Yeeda system** – described as "Sandplain, deep red and yellow sands, pindan and tall woodlands."

These land systems are generally not prone to degradation and are considered to have a low susceptibility to water or wind erosion if the disturbances such as grazing pressure and frequency of burning are controlled (Schoknecht, and Payne, 2011).

Most of the PDE is in a floodplain area naturally prone to wet season rainfall events, which could contribute to land degradation via flooding and heavy runoff. The proposed clearing is linear extending over 10 km and will be distributed across material areas There are several minor non-perennial watercourses and drainage lines along the length of the PDE. Management of these minor short-term risks will be addressed through the implementation of the Main Roads Standard Environment Management Plan that will include measures such as:

- the clearing of native vegetation restricted to occurring in dry conditions when non perennial minor watercourses are dry
- exposed soil working surfaces will be minimised. Material such as gravel, crushed rock and excavated material will be stockpiled away from drainage paths

The proposal is in a region where pre-European native vegetation extent remains largely uncleared (~99 %) and within the areas mapped as Cq(p4) and Co(p4) – 'Extremely Low Probability of Occurrence of ASS' (Commonwealth of Australia (Geoscience Australia), 2021). Since the proposed clearing is linear in nature, will be completed during the dry season and the natural surface water flows will not be intercepted, the proposal is unlikely to cause appreciable land degradation.

Based on the above, the proposed clearing is not likely to be at variance to this Principle.

Methodology

- Commonwealth of Australia (Geoscience Australia), (2021)
- Schoknecht and Payne (2011)
- Government GIS Shapefiles (Accessed 23/12/2025)
  - CSIRO Acid Sulfate Soil Risk Map
  - Soil Landscape Mapping Systems DPIRD
  - Hydrography Linear (Hierarchy) (DWER-031)
  - Pre-European vegetation

(h) Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.

Proposed clearing is not at variance to this Principle.

A search of GIS datasets indicates no conservation areas, Ramsar sites or nationally important wetlands are located within the PDE. The closes reserve is a Class 'A' 'Warlibirri National Park' vested under Conservation and Parks Commission and Gooniyandi Aboriginal Corporation RNTBC. The national park is more than 2.8 km from the PDE and is unlikely to be impacted by the project activities.

Based on the above, the proposed clearing is not at variance to this Principle.

Methodology

- Government GIS Shapefiles:
  - DBCA Legislated Lands and Waters (DBCA-011)
  - Directory of Important Wetlands in Australia – Western Australia (DBCA-045)
  - Ramsar Sites (DBCA-010)

(i) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.

Proposed clearing is not likely to be at variance to this Principle.

The PDE is located within the Fitzroy River and Tributaries Surface Water Area and Canning-Kimberley Groundwater Area, both proclaimed under the RIWI Act. Fitzroy Crossing Water Reserve – a Public Drinking Water Source Area (PDWSA) occurs across the Fitzroy River townsite located approximately 80 m from the PDE at its nearest point.

The PDE is located within the Fitzroy River catchment, which is one of the largest catchments in Western Australia, covering approximately 94,000 km2 / 9.4 million hectares (DWER, 2023). Three non-perennial watercourses - Blue Bush Creek, Two Mile Creek and an unnamed creek, and some minor drainage lines intersect the PDE.

Proposed clearing and construction works will occur during the dry season, potentially during 'no flow' conditions, reducing potential impacts to surface and groundwater. Other measures included in the VMP (Appendix 3) will also minimise the potential for deterioration in the quality of surface and groundwater, such as ensuring natural drainage pathways are not obstructed and ensuring all cleared, exposed and loose surface areas are protected from wind, water and soil erosion.

Given the Fitzroy River catchment is largely uncleared and VMP measures will be implemented to reduce erosion and ensure natural surface flows are maintained, the proposed vegetation clearing is unlikely to cause deterioration in the quality of surface or groundwater.

Based on the above, the proposed clearing is not likely to be at variance to this Principle.

Methodology

- DWER (2023)
- Government GIS Shapefiles (Accessed 22/12/2025):
  - RIWI Act, Surface Water Areas and Irrigation Districts
  - RIWI Act, Groundwater Areas
  - RIWI Act, Public Drinking Water Source Areas
  - Watercourses

(j) Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.

Proposed clearing is not at variance to this Principle.

The subregional climate is described as dry winter and hot semi-arid summer with an average annual rainfall of 485.6 mm (Gogo Station, Site ID- 3014) (Bureau of Meteorology Australia, 2025). Extreme weather events are a significant component of the Kimberley climate. Tropical cyclones and tropical storms can bring heavy and sustained rainfall, particularly in the months leading up to and during the wet season. It is common for a large proportion of the region's rainfall to be recorded in one single event, leading to extensive flooding of rivers, creeks and roadways.

The PDE is located in the Fitzroy River catchment (comprising 94,000 square kilometres / 9.4 million hectares), with non-perennial watercourses and drainage lines intersecting the envelope across the proposed realignment. The proposed clearing will take place in the dry season and natural drainage pathways will not be obstructed. The extent of clearing proposed is negligible in the context of the largely uncleared Fitzroy River catchment and is not expected to have any measurable influence on natural flooding regimes. As noted above, climatic conditions are the main factor influencing flooding. The proposed clearing of up to 198 ha, spread across a PDE of over 1,000 ha is unlikely to cause or exacerbate the incidence or intensity of flooding.

Based on the above, the proposed clearing is not at variance to this Principle.

Methodology

- Bureau of Meteorology Australia (2025)
- Government GIS Shapefiles (Accessed 22/12/2025):
  - Watercourses
  - Hydrography Linear (Hierarchy) (DWER-031)

6 VEGETATION MANAGEMENT

Main Roads will avoid clearing native vegetation where possible. Where clearing cannot be avoided then this clearing is kept to a minimum. A Vegetation Management Plan (VMP) has been developed to manage and minimise vegetation clearing for the Proposal (refer to Appendix 3).

7 REHABILITATION, REVEGETATION AND OFFSETS

7.1 Revegetation and Rehabilitation

No temporary clearing will be undertaken as part of the Proposal activities and therefore no revegetation or rehabilitation will be conducted under CPS 818.

7.2 Offset Proposal

In accordance with CPS 818 condition 11(a), Main Roads is seeking an exemption from submitting an offset proposal.

8 STAKEHOLDER CONSULTATION

Main Roads has undertaken stakeholder consultation in accordance with Condition 8 of CPS 818/17.

The CAR was published on the Main Roads Website for a period of 21 days from 10 February 2026 - 3 March 2026. As part of this process, Main Roads invited submissions from a Gogo Station Land Manger, Environs Kimberley, Shire of Derby-West Kimberley and Department of Water and Environmental Regulation (DWER).

The stakeholders raised technical concerns relating to the project which were noted and responded to accordingly. However, no submissions related to the proposed clearing of native vegetation under CPS 818.

9 COMPLIANCE WITH CPS 818

Table 5 summarises what further pre-clearing impact assessment is required in accordance with CPS 818.

Table 5. Summary of Additional Management Actions Required by CPS 818

Impact of Clearing	Yes/No or NA	Further Action Required
1. The CAR indicates that the clearing is 'At Variance' or 'May be at Variance' with one or more of the Clearing Principles.	**Yes**	**1.** Clearing Report to be published on website and submissions sought for 21 days. **2.** Submissions invited from relevant parties, including the LGA, the owner or occupier of the land and other stakeholders in accordance with Condition 8 of CPS 818. **3.** VMP has been completed, refer to Appendix 3. **4.** Summary of submissions and a statement addressing each of those submissions to be published on website.
2. Clearing is at variance or may be at variance with Clearing Principle (g) land degradation, (i) surface or underground water quality **or** (j) the incidence of flooding.	**No**	No further action required.
3. Clearing is at variance with Clearing Principle (g) land degradation, (i) surface or underground water quality **and** (j) the incidence of flooding.	**No**	No further action required.
4. The Proposal involves clearing for temporary works (as defined by CPS 818).	**No**	No further action required.
5a. Proposal is within a Region that: • has rainfall greater than 400mm; and, • is South of the 26th parallel; and, • works are necessary in 'Other than dry conditions'; and, • works have potential for **uninfested** areas to be impacted.	**No**	Standard Vehicle and Plant management actions from Annexure 204B (TABLE 204B.9.1), Hygiene Checklists will be applied.
5b. Do the proposed works require clearing within or adjacent to DBCA managed lands in non-dry conditions?	**No**	No further action required.
6. Main Roads has been notified by DWER or an environmental specialist that the area to be cleared is susceptible to a pathogen other than dieback.	**No**	No further action required.

Impact of Clearing	Yes/No or NA	Further Action Required
7. Weeds are likely to spread to and result in environmental harm to adjacent areas of native vegetation that are in good or better condition.	**No**	No further action required.
8. Did an environmental specialist conduct the survey or field assessment?	**Yes**	The Environmental Specialist undertaking the biological assessments was suitably qualified and had more than three years' experience.
9. Did an environmental specialist prepare the Assessment Report and any other associated documentation including the VMP, Dieback Management Plan or Offset Proposal?	**Yes**	The Environmental Specialist preparing the Assessment Report and any other associated documentation including the VMP, Dieback Management Plan or Offset Proposal was suitably qualified and had more than three years' experience.

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11 APPENDICES

Appendix 1: GNH Plum Plains to Gogo Section Biological Survey, Main Roads Western Australia, Ecoscape (2025) Executive Summary

Main Roads Western Australia (Main Roads) is planning to commence road development and upgrade works in the Fitzroy Crossing area on the GNH from Plum Plains to Gogo between SLK 2515.8 and 2522.5.

Main Roads appointed Ecoscape to undertake a Detailed and Targeted flora and vegetation plus a Basic and Targeted terrestrial vertebrate fauna survey of three road sections/material pits.

- GNH Fitzroy to Gogo Section, SLK 2515.8-2552.5
- GNH Plum Plains to Fitzroy Section (including Fitzroy Airport), SLK 2521.8
- Ngurtuwarta Material Pit, SLK 2522.2.

The outcome of the assessments will be used to inform the environmental assessment and approvals process and may assist in the preparation of Environmental Impact Assessment documentation.

Prior to undertaking the field surveys, an initial desktop assessment was completed. The key findings of the desktop assessment were:

- five pre-European vegetation associations intersect the survey area, each with greater than 99% of their statewide extent remaining.
- six Priority Ecological Communities (PECs) identified by the database search from within 40 km (the 'study area'); one of these, the Gogo Land System PEC, has been mapped within the survey area.
- 15 Priority-listed flora (PF) were identified as having been recorded within the study area by the database searches consisting of eight Priority 1, two Priority 2 and five Priority 3. None of the PF have been previously recorded within the survey area. Two P3 taxa (*Corchorus fitzroyensis* and *Goodenia sepalosa* var. *glandulosa*) were identified as being Likely to occur based on the information available during the desktop assessment.
- 45 conservation-listed fauna species were identified by the combined database searches (PMST and DBCA) within the study area, including eight mammals, 30 birds, five reptiles and two other species of interest. Three of these species (*Malurus coronatus coronatus* [Purple-crowned Fairywren], *Pandion haliaetus* [Osprey] and *Hannia greenwayi* [Greenway's Grunter]) have been previously recorded within the survey area and a further five were assessed as 'may occur'.

The flora and vegetation field surveys were conducted during 23 February to 3 March and 24 March to 1 April 2025 following a period of above-average rainfall. The key outcomes and findings from the flora and vegetation field surveys and subsequent analysis were:

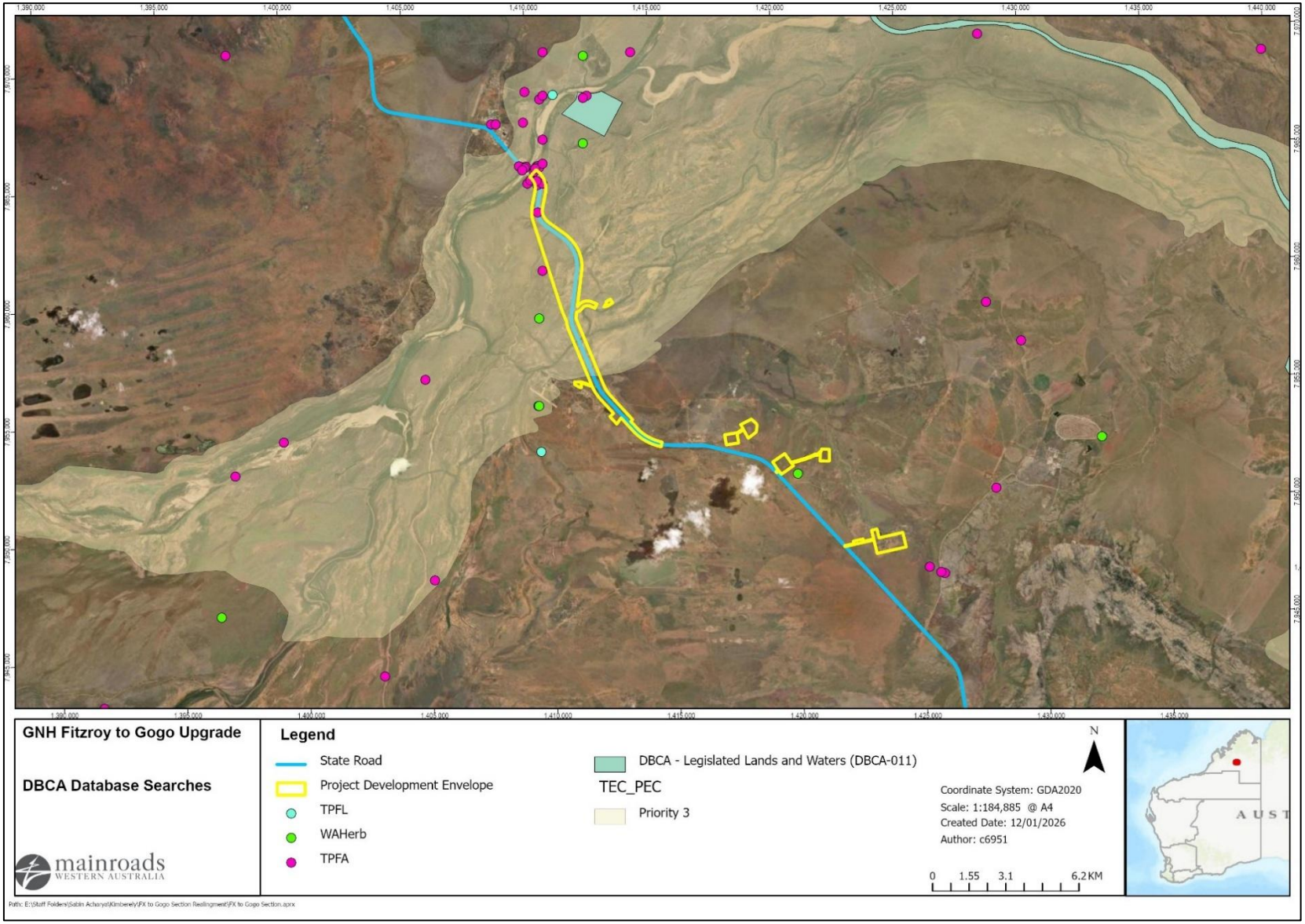
- 65 floristic quadrats established within the survey area.
- 386 vascular flora recorded from the survey area, including:
  - five conservation-listed flora; *Calandrinia sp*. Lennard River (W.V. Fitzgerald 739) (P1), *Polygala crassitesta* (P1), *Corchorus fitzroyensis* (P3), *Goodenia sepalosa* var. *glandulosa* (P3) and *Rothia indica* subsp. *australis* (P3)
  - 29 introduced flora species, including three Declared Pest Plants (**Azadirachta indica* [Neem Tree], **Calotropis procera* [Calotrope] and *Parkinsonia aculeata* [Parkinsonia]). Parkinsonia is also listed as a Weed of National Significance.
- 20 vegetation types from four landform types (low hills/slopes, sand dunes, plains and drainage lines) including:

  - three vegetation types considered representative of the Gogo Land System PEC
  - one riparian vegetation type associated with drainage lines (**EcEa**) and three wetland vegetation types associated with floodplains (**Ae**, **Df** and **EcCf**).
- the vegetation condition ranged from Good to Excellent with the majority in Very Good (41.39%) or Good condition (37.91%). The main factors affecting vegetation condition were grazing pressure, the presence/abundance of weeds and historical clearing

The fauna field survey was conducted during 24 March to 1 April 2025. The findings of the vertebrate fauna field surveys were:

- six distinct habitat types were recorded from within the survey area: Open shrubland over tussock grassland, Open woodland over tussock grassland, Open / sparse woodland over hummock grassland, Grassland, Creek line and Seasonal waterbodies. None are considered of local or regional significance, and all are abundant in the landscape.
- 121 vertebrate fauna species; including four conservation-listed/of conservation interest: Northern Blue tongued Skink (EPBC – CR), Yellow-lipped Cave Bat (DBCA – P2), Peregrine Falcon (DBCA – OS) and Rainbow Bee-eater (EPBC – MA).

Appendix 2: DBCA Threatened Flora and Fauna Database Searches



Appendix 3: Vegetation Management Plan

GNH Fitzroy to Gogo Upgrade

Purpose and Scope

This Vegetation Management Plan (VMP) has been prepared by Main Roads for the purpose of managing native vegetation clearing impacts associated with the project 'GNH Fitzroy to Gogo Upgrade' located on Great Northern Highway (GNH) H006 between SLK 2525.0 – 2535.7, in Shire of Derby-West Kimberley.

The Fitzroy Crossing to Gogo section of the Great Northern Highway (GNH) crosses an extensive floodplain associated with the Margaret River and Fitzroy River. This section of GNH is subject to annual flooding following wet season rainfall events, resulting in road closures for several days or weeks, depending on the severity of flooding. The project is to upgrade approximately 10 km of GNH between Fitzroy Crossing and Gogo Station to meet current serviceability levels for a national highway, inclusive of three side road intersections at Fossil Downs Road, Gogo Road and Lamey Ave. Construction works are planned to commence in 2026 with a 2-3-year build duration. The proposal scope will involve:

- Construction of approximately 10 km of new road, 11 m seal on 11 m formation.
- Investigation and development of material pits to support the upgrade works.
- Construction of two new creek crossings, which will comprise of a bridge structure over Two Mile Creek and a large culvert structure at Blue Bush Creek.
- Upgrading floodways and culverts along the new realignment and existing highway.
- Installation of ITS, including remote censoring of flood levels.
- Removal and Rehabilitation of existing GNH and demolition of existing single lane single bridges at Two Mile Creek and Blue Bush Creek.

In specified circumstances, Main Roads VMP is required to be approved by Department of Water and Environmental Regulation (DWER) as a condition of the Main Roads Statewide Clearing Permit CPS 818.

Actions, and their relevant timeframes, from this VMP will be documented within the relevant Tender Documentation (Specifications), such as:

- Specification 204 Environmental Management
- Specification 301 Vegetation Clearing and Demolition
- Specification 303 Materials and Water
- Specification 304 Revegetation
- Specification 304 Rehabilitation of Disturbed Areas.

Once the Contract has been awarded, the Superintendent's Contract Management Team (or equivalent roles) are to ensure that the requirements are implemented by the Contractor.

Avoiding, Mitigating and Managing the Impacts of Clearing

A number of measures were undertaken to during the development and design of the proposal to reduce its impact the environment.

For further information on the alternatives that were considered during the proposal development, please go to Section 1.5 of the Clearing Assessment Report for the proposal.

For further information on the measures undertaken to avoid, minimise, reduce and manage the proposal's clearing impacts, please go to Section 1.6 of the Clearing Assessment Report for the proposal.

VMP Actions

General vegetation management actions to be undertaken is shown in Appendix 4.1: General Vegetation Management Actions for Clearing.

Appendix 3.1: General vegetation management actions for clearing

Management Action	Responsibility	Timing
The Contractor must ensure plant, machinery and equipment, is cleaned down prior to arrival to the site.	Superintendent	During construction
Vehicle hygiene inspection checklists will be utilised to manage potential weed on earth-moving machinery.	Superintendent	During construction
No known foreign weed infested soil, mulch, fill or other material will be permitted into the works area.	Superintendent	During construction
All Clearing must be undertaken in such a way to allow fauna to move out of the Clearing area.	Superintendent	During construction
The Limits of Vegetation Clearing will be demarcated on site prior to the commencement of clearing to prevent entry into areas of native vegetation.	Superintendent	During construction
Natural drainage pathways will not be obstructed from stockpile gravel, crushed rock and excavated material.	Superintendent	During construction
All recently cleared, exposed and loose surface areas shall be protected from wind, water and soil erosion.	Superintendent	During construction
The Contractor will ensure that clearing of native vegetation is only undertaken in dry conditions, unless otherwise approved and / or directed by the Superintendent.	Superintendent	During construction
All Special Environmental Areas will be pegged in accordance with Main Roads' Drawing 201928-0001-1 Construction Peg Colour Code (https://www.mainroads.wa.gov.au/globalassets/technical-commercial/technical-library/standard-contract-drawings/vegetation/construction-environmental-management/201928-0001-construction-peg-colour-code-drawing.pdf?v=49bd3b).	Superintendent	During construction
The Contractor must develop and detail a Site induction training program as part of the CEMP that includes as a minimum, the significant environmental impacts, actual or potential, of work activities associated with the Contract	Superintendent	During construction

Hold Points

Main Roads' preclearing Hold Point applies to all projects that require vegetation clearing, as documented within Specification 301 (301.12 PRE-CLEARING PROCESS). Accordingly, all Hold Point actions must be signed off prior to clearing commencing. This Hold Point comprises the following actions:

1. Prior to the commencement of any clearing operations, the Contractor must certify for the Superintendent's verification and approval that the following activities have been completed in accordance with the relevant specification:

a) The pegging of limits of vegetation clearing has been undertaken.

b) The pegged vegetation clearing area does not exceed the Limits of Vegetation Clearing.

c) Mature trees have been conserved as far as practicable.

d) The pegging of special environmental areas has been undertaken.

f) All pre-clearing weed control has been undertaken.

g) All pre-clearing fauna operational controls have been undertaken.

h) Suitable and unsuitable topsoil zones have been identified.

i) Vegetation and topsoil stockpile locations have been identified.

j) All clearing machinery is compliant with controls.

Monitoring and Maintenance Program

The Superintendent's Contract Management Team shall monitor the implementation of management actions that are a **Hold Point**. **Hold Point** actions must be signed off by the Superintendent's Representative to confirm it has occurred and recorded within the Superintendent's Contract Management Plan.

Non-Compliance

Non-compliance with management actions will trigger corrective actions, preventative actions and/or an incident investigation. Non-compliances will be recorded with Main Roads incident management system and reviewed by Main Roads Manager Environment.

The need for reporting non-compliances with VMP management actions to DWER will be determined as part of an incident investigation.

Revegetation

Revegetation will be undertaken in accordance with Condition 9 of CPS 818. Relevant requirements from Condition 9 have been incorporated into Project Revegetation Plan Template. The elements to be implemented by the Contractor will be incorporated into the relevant Specification 304.