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WESTERN AUSTRALIA

Annual Compliance Report

**Perth Airport and Freight Access Project
(Gateway WA)
EPBC Approval 2010/5384**

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Western Australia.*

Reporting Period: July 2024 to July 2025

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Contents

Declaration of Accuracy.....	4
1 INTRODUCTION	5
1.1 Description of Activities	5
1.2 Location of the Approved Action	5
1.3 EPBC 2010/5384 Approval Background.....	7
1.4 Purpose of this Report.....	7
2 SUMMARY OF COMPLIANCE	8
2.1 Corrective Measures	8
2.2 New Environmental Risks	8
3 APPENDICES	9
Appendix A: Compliance Table	9

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Declaration of Accuracy

I declare that to the best of my knowledge, all the information contained in, or accompanying this document is complete, current and correct. I am duly authorised to sign this declaration on behalf of the proponent/approval holder. I am aware that:

- a) giving false or misleading information is a serious offence under section 137.1 of the *Criminal Code Act 1995* (Cth);
- b) section 137.2 of the *Criminal Code Act 1995* (Cth) makes it an offence for a person to produce a document to another person in compliance or purported compliance with a law of the Commonwealth where the person knows that the document is false or misleading;
- c) section 140 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) makes it an offence for an approval holder to provide information in response to an approval condition where the person is reckless as to whether the information is false or misleading; and
- d) section 491 of the EPBC Act makes it an offence for a person to provide information or documents to specified persons who are known by the person to be performing a duty or carrying out a function under the EPBC Act or the Environment Protection and Biodiversity Conservation Regulations 2000 (Cth) (EPBC Regulations) where the person knows the information or document is false or misleading.

Signed Martine Scheltema (approval holder)

Full name (please print) Martine Scheltema

Position (please print) Director of Environment and Heritage

Organisation: Main Roads Western Australia (ABN: 50 860 676 021)

Date 27 / 10 / 25

1 INTRODUCTION

1.1 Description of Activities

Main Roads Western Australia (Main Roads) constructed the Gateway Perth Airport and Freight Access project (the Gateway project; the Project), which consisted of a series of upgrades and new construction on Tonkin Highway between Great Eastern Highway and Roe Highway, as well as part of Leach Highway from Orrong Road to Perth Airport.

The Gateway project area occurs approximately 8 km east of the Perth central business district in the eastern Perth metropolitan suburbs of Redcliffe, Belmont, Cloverdale, Kewdale, Welshpool and Forrestfield. The construction of the Gateway project was initially completed for Areas 1, 2 and 4 in September 2015 and Areas 3 and 6 in March 2016 (Figure 1). Main Roads commenced work on the proposal in July 2013.

Some minor additional works were undertaken along Roe Highway in Areas 6 in 2017 and other upgrade works were undertaken within the northern Area 1 between 2020 and the first half of 2024.

No construction or clearing activities were undertaken during the reporting period (July 2024 to July 2025).

1.2 Location of the Approved Action

The location of the approved action is shown in Figure 1.



Figure 1- Project Overview Map

Legend

Northern Zone

- Area 1 – Tonkin Hwy, GEH to Elson
- Area 2 – Tonkin Hwy/Leach Hwy

Western Zone

- Area 4 – Leach Hwy/Abernethy Rd
- Area 5 – Kewdale Area

Southern Zone

- Area 3 – Tonkin Hwy/Kewdale Rd/Horrie Miller Dr
- Area 6 – Tonkin Hwy/Roe Hwy
- Area 7 – Abernethy Rd Ramp Connection

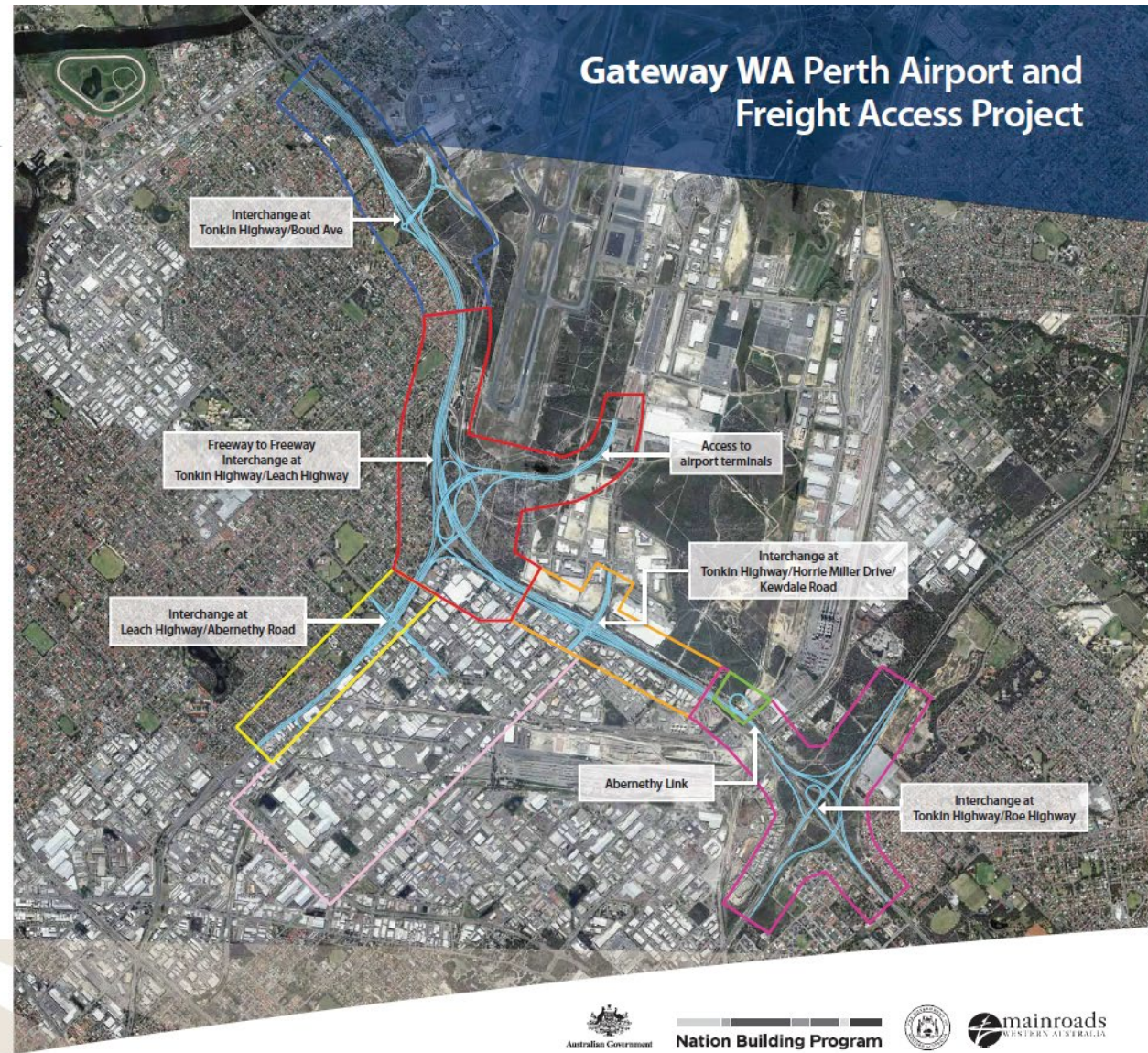


Figure 1. Project staging Location Map

1.3 EPBC 2010/5384 Approval Background

The Project was referred to the Commonwealth Department of the Environment, Water, Heritage and the Arts (DEWHA; now the Department of Climate Change Energy, the Environment and Water (DCCEEW)) in March 2010 for assessment under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The Project was determined to be a Controlled Action on 31 March 2010 due to its potential impacts on listed threatened species and communities and Commonwealth Land. The then Department of Environment (now DCCEEW) granted conditional approval for the Project on 21 February 2013 (EPBC 2010/5384).

Since initial approval, the following correction notices and variation approvals have been issued:

- Corrective Notice 20/03/2013
- Variation Approval 02/06/2013
- Correction Notice 18/06/2013
- Variation Approval 07/10/2013
- Consolidated Approval conditions 07/10/2013.

1.4 Purpose of this Report

This Annual Compliance Report (ACR) has been produced to satisfy Condition 14 of approval EPBC 2010/5384 and covers the period from July 2024 to July 2025.

This report assesses compliance with all conditions of the approval and will be published on Main Roads website.

2 SUMMARY OF COMPLIANCE

Compliance with the conditions of approval will be assessed as one of the following:

- Compliant – the condition has been complied with during the reporting period
- Non-Compliant - the condition has not been complied with during the reporting period
- Not Applicable - the condition falls outside of the scope of the current reporting period and is not relevant.

Conditions deemed completed are shaded grey.

Table 1 in Appendix A of this report details the Project's compliance with regard to each approval condition over the 12 month reporting period: 31 July 2024 to 30 July 2025.

As reported in the 2024 ACR, the Project was found to be non-compliant with Condition 20 of EPBC Approval 2010/5384, which relates to the monitoring and maintenance requirements within the approved Keighery's *Macarthuria* Offset and Management Plan. Main Roads has been working with the Department to develop an approach to meet the objectives of Condition 20.

The specific underlying causes of failure to establish *Macarthuria keigheryi* in the offset site have not been determined. While it is likely that the reasons for the poor establishment are multi-faceted, the biology of *M. keigheryi* is considered a potentially significant limiting factor given it is a disturbance specialist, fire ephemeral species, that spends much of its lifecycle present as seed or below ground, waiting for stimulus to emerge, making it difficult to determine whether the translocation has been successful.

2.1 Corrective Measures

Given the lack of success in achieving the requirements of Condition 20, on 23 July 2025, DCCEEW advised Main Roads that it intended to create a Directed Variation to replace Condition 20 and revise the *Keighery's Macarthuria* Offset Management plan. The intent of the revised Offset Management Plan and Conditions of Approval will be to appropriately account for and mitigate the impact on the species going forward.

Main Roads is liaising with the State Department of Biodiversity, Conservation and Attractions (DBCA) (and other relevant stakeholders as required) to agree on an alternative offset strategy and to revise the Keighery's *Macarthuria* Offset Management plan, for submission to the Department.

2.2 New Environmental Risks

No new environmental risks for the project have been identified during the reporting period.

3 APPENDICES

Appendix A: Compliance Table

Table 1. Compliance with Conditions of EPBC Approval 2010/5384

Condition Number	Condition	Status	Evidence/Comments
1	For the protection of listed threatened species, wetlands and Commonwealth land, the person taking the action must ensure that: a) no more than 27.3 hectares of Black Cockatoo foraging habitat is cleared; b) no more than 360 individuals of Keighery's Macarthuria in an area not exceeding 0.71ha within Area 2 are cleared; c) no more than 62 individuals of Wavy-leaved Smokebush are cleared; d) no more than 16 hectares of wetlands on Commonwealth land are removed or permanently dewatered; e) no more than 9.2 hectares of the Infrastructure Only Conservation Zone is cleared; and f) construction does not occur outside of the project footprint.	Compliant	No clearing of native vegetation occurred during this reporting period. To date, the following impacts have occurred for the Gateway Project includes: a) clearing of 21.25ha of Black Cockatoo foraging habitat b) clearing of 0.66ha of Macarthuria habitat c) clearing of 29 <i>Conospermum undulatum</i> plants d) clearing of 12.81ha of Commonwealth Land e) clearing of 9.16ha of Infrastructure Only Conservation Zone f) No clearing was undertaken during this reporting period.
2	The person taking the action must prepare and submit for approval an Environment Offset Strategy (EOS) to the Minister to fund and implement an environmental offset for the better protection of listed threatened species and wetlands. The EOS must be submitted for approval by the Minister at least one (1) month prior to the	Compliant	The Environment Offset Strategy was approved by SEWPAC (now DCCEEW) on 23 June 2013. Of the 62 individuals of Wavy-leaved Smokebush that were authorised to be taken for the project, only 29 were cleared, with 33

Condition Number	Condition	Status	Evidence/Comments
	commencement of construction. The EOS must provide for the enhancement and protection of native vegetation, including wetland and swamp vegetation types, and individuals and habitat of listed threatened species. The EOS must include, but not be limited to: a) provision of compensatory habitat for impacts to Black Cockatoos, wetlands and the Infrastructure Only Conservation Zone including a commitment to securing the Lowlands offset as a Class A Reserve within 24 months from the commencement of construction; and b) a commitment to compensate for impacts to the Wavy-leaved Smokebush including establishment of a viable population of at least 120 individuals in accordance with the measures listed in Conditions 5) b) i) to vii) Construction must not commence until the EOS has been approved by the Minister. The EOS must be implemented as approved.		plants avoided. 171 <i>Conospermum undulatum</i> were planted during the winter of 2015. Subsequent infill planting of an additional 101 plants occurred in 2017 and an additional 180 plants in 2019. Main Roads has been continuing to work towards establishing the 120 <i>C. undulatum</i> plants in the Pioneer Park. Results to date have not yielded the intended population size within the offset area. Main Roads most recent monitoring identified 19 of the 452 plants propagated and translocated remain within the offset area. Main Roads met with DBCA on 21 November 2024 to determine a strategy to deal with this shortfall in population. Further consultation with DBCA and Perth Airport was recommended to determine a strategy forward. Main Roads is scheduled to meet with DBCA and Perth Airport in Q4 2025 to progress options for suitable alternative offset options. The EOS continues to be implemented as approved.

Condition Number	Condition	Status	Evidence/Comments
3	Evidence that the Lowlands offset has been acquired (subject to Condition 5) must be submitted to the department within five (5) months of the commencement of construction.	Compliant - Completed	Lowlands offset property was acquired on 23 December 2013
4	If the Lowlands offset is not secured as a Class A Reserve within 24 months from the commencement of construction, as per Condition 2)a), and at this time the person taking the action cannot provide to the Minister's satisfaction documentary evidence to demonstrate that all reasonable measures have been undertaken to secure the Lowlands offset as a Class A Reserve within the timeframe, then all construction must cease. Construction may resume at such time as: a) the person taking the action is able to satisfy the Minister that the Lowlands offset is secured as a Class A Reserve; or b) the person taking the action is able to provide documentary evidence to demonstrate to the Minister's satisfaction that all reasonable measures have been undertaken to secure the Lowlands offset as a Class A Reserve; and c) additional compensation to the Minister's satisfaction has been provided that accounts for the additional risk of loss of the Lowlands offset not being a Class A Reserve.	Compliant - Completed	The offset property was created as a Class A Reserve on 30 March 2015.
5	If the Lowlands offset cannot be acquired within five (5) months of the commencement of construction, then construction must cease and an alternative environmental offset strategy (AEOS) for the protection of listed threatened species and wetlands must be provided to the Minister. The AEOS must: a) provide a strategy to effectively secure a suitable direct offset within 100 km of the project site;	Not applicable - Completed	Contingency condition not required as Lowlands offset property was acquired on 23 December 2013.

Condition Number	Condition	Status	Evidence/Comments
	b) contain direct, and if necessary, other compensatory measures that are consistent with the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) Environmental Offset Policy (October 2012) and Offsets Assessment Guide to ensure that for the duration that the impact occurs on the project site, the AEOS contains: i. measures to maintain or improve ecological values to manage threats to the ecological values, including management of fire and measures to exclude people, pests, weeds and dieback; ii. measures to rehabilitate degraded habitat condition to a level consistent with the quality projected in the application of the EPBC Act Environmental Offset Policy (October, 2012) and the associated Offsets Assessment Guide; iii. maps of the proposed offset site showing vegetation quality, areas being rehabilitated (including their current and proposed quality) and dieback free zones; iv. performance indicators for rehabilitation; v. details of monitoring and reporting to the department and contingency measures if performance indicators are not met; vi. timeframes for the implementation and completion of the above measures; and vii. roles and responsibilities of personnel associated with implementing each of the above measures and funding arrangements.		

Condition Number	Condition	Status	Evidence/Comments
	Construction must not re-commence until the AEOS has been approved by the Minister and the identified direct offset has been acquired or legally secured to the satisfaction of the Minister. The AEOS must be implemented as approved.		
6	The person taking the action must prepare and submit for approval a Construction Environment Management Plan (CEMP) (or plans, for each construction zone) to the Minister for the better protection of listed threatened species, permanently protected wetlands and Commonwealth land. The CEMP must be submitted for approval by the Minister at least three (3) months prior to the commencement of construction for any construction zone, except for 'Area 3' (as shown in Attachments B2 and B3), for which a CEMP must be submitted for approval by the Minister at least one (1) month prior to the commencement of construction. The CEMP must include, but not be limited to: a) details on the timing of construction works; b) current and detailed maps of each construction zone that include the location of: i. permanent infrastructure and temporary works (including access tracks, vehicle parking, laydown areas and temporary material stockpiles); ii. no-go areas; iii. fauna exclusion fences and fauna underpasses; and iv. other physical barriers used for the protection of identified listed threatened species and permanently protected wetlands.	Compliant	A Construction Environment Management Plan (CEMP) was approved for works in Area 3 (Tonkin/Kewdale/Horrie Miller Interchange) on 23 June 2013 by DotEE (now DCCEEW). Furthermore a CEMP superseding the Area 3 plan was approved on 18 July 2013 by DotEE (now DCCEEW) covering the entire Gateway WA Project. Construction commencement was identified in 2014-2015 annual report. Works commenced after CEMP was approved. No construction works were undertaken during the reporting period.

Condition Number	Condition	Status	Evidence/Comments
	c) a vegetation clearing strategy that includes: i. measures to minimise the extent of native vegetation clearing; ii. measures to ensure that all vehicle parking, laydown areas and temporary materials stockpiles and other temporary facilities are located within existing hardstand areas or previously cleared sites and that environmental discharges from these areas are contained, controlled and monitored; iii. the erection of a fauna exclusion fence along the boundary of the project footprint and the Infrastructure Only Conservation Zone; and iv. measures undertaken to re-use and maintain removed individuals of Wavy-leaved Smokebush to revegetate other disturbed areas within the project footprint in accordance with the Guidelines for the translocation of threatened plants in Australia (1998), Australian Network for Plant Conservation, Canberra. d) a permanently protected wetland impact strategy that includes: i. the identification, exact location and maximum extent of each permanently protected wetland ii. measures to ensure that all vehicle parking, laydown areas and temporary materials stockpiles and other temporary facilities are located within existing hardstand areas or previously cleared sites; iii. measures to ensure that any environmental discharges that may enter any permanently protected wetland are prevented, or		

Condition Number	Condition	Status	Evidence/Comments
	controlled and monitored to meet acceptable water quality criteria; iv. details of the duration, location, methodology used, and results of, a baseline study of water quality prior to construction for use as a benchmark for monitoring as per condition 6) d) vi); v. stated acceptable water quality criteria during construction and operation; vi. measures to monitor water quality monthly during construction and quarterly for three (3) years following practical completion; vii. the timeframes for, and nature of, corrective, remedial or restorative actions to be taken where a deviation from the criteria specified in condition 6) d) v) occurs; and viii. if the corrective, remedial or restorative actions of condition 6) d) vii) cannot restore water quality to a point equivalent to, or better than, the baseline condition or acceptable criteria specified in conditions 6) d) iv) or 6) d) v) within 12 months of first detecting a degradation, then compensation for the loss of each permanently protected wetland so affected must be provided in accordance with condition 5) b). e) a hygiene management program to minimise the spread of weeds and dieback within the project footprint, during construction and operation, which must include, but is not limited to: i. cleaning procedures for vehicles, equipment and plant prior to entering the project footprint; and ii. the certification of the absence of weeds and <i>Phytophthora</i>		

Condition Number	Condition	Status	Evidence/Comments
	cinnamomi in any imported soils. f) maintenance measures to prevent the slashing/mowing or accidental clearing of Keighery's Macarthuria (<i>Macarthuria keigheryi</i>) and Wavy-leaved Smokebush from ongoing maintenance activities; g) sediment and erosion control measures to restrict the movement of sediment onto and from the project footprint; and h) stormwater management measures compliant with the Stormwater Management Manual for Western Australia and the quantity and quality criteria set by the WA Department of Water. Construction must not commence until the CEMP has been approved by the Minister. The CEMP must be implemented as approved.		
7	The person taking the action must prepare and submit for approval an Operation Environment Management Plan (OEMP) (or plans, for each construction zone) to the Minister for the better protection of listed threatened species, permanently protected wetlands and Commonwealth land. The OEMP must be submitted for approval by the Minister at least one (1) month prior to practical completion of any construction zone. The OEMP must include, but not be limited to: a) measures to prevent the slashing/mowing or accidental clearing of Keighery's Macarthuria (<i>Macarthuria keigheryi</i>) and Wavy-leaved Smokebush from ongoing maintenance activities; b) sediment and erosion control measures to restrict the movement of sediment onto and from the project footprint; and c) stormwater management measures compliant with the Stormwater Management Manual for Western Australia and the	Compliant	The Operational Environment Management Plan was approved by DotEE (now DCCEEW) on 7 July 2015. Main Roads has continued to maintain the roadside in accordance with Main Roads standard management and maintenance guidelines, as outlined in the OEMP. No environmental incidents associated with impacts to MNES as part of the operation occurred during this reporting period.

Condition Number	Condition	Status	Evidence/Comments
	quantity and quality criteria set by the WA Department of Water. Operation must not commence until the OEMP has been approved by the Minister. The OEMP must be implemented as approved.		
8	The person taking the action must prepare and submit for approval a Rehabilitation Management Plan (RMP) (or plans, for each construction zone) to the Minister for the better protection of listed threatened species, permanently protected wetlands and Commonwealth land. The RMP must be submitted for approval by the Minister at least one (1) month prior to the commencement of construction for any construction zone. The RMP must include, but not be limited to: a) the methodology and record keeping to baseline environmental quality prior to construction; b) measures and timeframes to re-establish or rehabilitate any permanently protected wetlands or listed threatened species habitat that is disturbed during construction to the same or higher quality that existed prior to disturbance, including criteria to measure rehabilitation success; c) measures to monitor rehabilitated areas to determine its success against the criteria established under condition 8) b); and d) contingency actions that will be implemented should rehabilitation not meet success criteria established under condition 8) b). Construction must not commence until the RMP has been approved by the Minister. The RMP must be implemented as approved.	Compliant	The current Rehabilitation Management Plan was approved on 18 July 2013 and continues to be implemented. Revegetation works within the majority of the Gateway project were completed in 2015. Vegetation maintenance activities have been conducted in the defects liability period and by Main Roads asset management for the 5 year management period required in the RMP. The monitoring period has now ceased.

Condition Number	Condition	Status	Evidence/Comments
9	The person taking the action must obtain a Dewatering Licence to undertake dewatering where it occurs on state land. A copy of the Dewatering Licence must be submitted to the department at least one (1) month prior to the commencement of dewatering.	Compliant	No dewatering activities occurred within the reporting period.
10	The person taking the action must submit to the Minister for approval, a Dewatering Management Plan (DMP) (or plans, for each construction zone) relating to Commonwealth and state land within the project footprint that is consistent with its corresponding Dewatering Licence required under Condition 9, and contains monitoring, mitigation and management measures. The DMP must be submitted for approval by the Minister at least three (3) months prior to the commencement of dewatering for any construction zone except for 'Area 3' (as shown in Attachments B2 and B3) for which a DMP must be submitted for approval by the Minister at least one (1) month prior to the commencement of dewatering. Dewatering must not commence until the DMP for the relevant construction zone has been approved by the Minister. The DMP must be implemented as approved.	Compliant	A Dewatering Management Plan (DMP) was approved for works in Area 3 (Tonkin/Kewdale/Horrie Miller Interchange) on 23 June 2013 by Department of Sustainability, Environment, Water, Population and Communities (DSEWPAC) (now DCCEEW). No dewatering activities occurred within the reporting period.
11	The person taking the action must prepare and submit a Community Issues Management Plan (CIMP) that includes but is not limited to: a) a consultation strategy to address the concerns of relevant stakeholders relating to visual amenity, environmental degradation and noise impacts, including measures to consult with affected residents regarding appropriate amelioration designs; and b) a communication strategy to inform the public regarding construction activities and expected noise impacts.	Compliant	A Stakeholder Engagement Plan was submitted to DSWEPAC (now DCCEEW) and DCCEEW advised that the plan was found to meet the requirements of the approval conditions on 23 June 2013. CIMP has not been revised.

Condition Number	Condition	Status	Evidence/Comments
	The CIMP must be submitted to the department at least one (1) month prior to commencement of construction and whenever the CIMP is revised.		
12	Within 20 days after the commencement of construction, the person taking the action must advise the department in writing of the actual date of commencement.	Compliant - Completed	As per 2014-2015 annual report.
13	The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including consultation with relevant stakeholders and measures taken to implement the management plans and strategies required by this approval, and make them available upon request to the department. Such records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the department's website. The results of audits may also be publicised through the general media.	Compliant	Main Roads has maintained records in accordance with this condition and their legal obligations under the <i>State Records Act 2000</i> (Western Australia).
14	Within three months of every 12 month anniversary of the commencement of construction, the person taking the action must publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans and strategies as specified in the conditions. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of this approval must be provided to the department at the same time as the compliance report is published.	Compliant	This report will be published on the MRWA website (location below), within three months of the 12 month anniversary of commencement of construction. Documentary evidence will be provided to the Department at the same time as this document is published on the website. Construction Project Compliance Reports Main Roads Western Australia
15	Upon the direction of the Minister, the person taking the action must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The	Not applicable	The Minister has not given direction for an independent audit to be undertaken to date.

Condition Number	Condition	Status	Evidence/Comments
	independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.		
16	If the person taking the action wishes to carry out any activity otherwise than in accordance with the management plans/strategy as specified in the conditions, the person taking the action must submit to the department for the Minister's written approval a revised version of that management plan/strategy. The varied activity shall not commence until the Minister has approved the varied management plan/strategy in writing. The Minister will not approve a varied management plan/strategy unless the revised management plan/strategy would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised management plan/strategy that management plan/strategy must be implemented in place of the management plan/strategy originally approved.	Not applicable	No changes to management plans or strategies have been implemented without prior approval from DCCEEW.
17	If the Minister believes that it is necessary or convenient for the better protection of a listed threatened species, wetland or the Commonwealth land to do so, the Minister may request that the person taking the action make specified revisions to the management plans/strategy specified in the conditions and submit the revised management plan/strategy for the Minister's written approval. The person taking the action must comply with any such request. The revised approved management plan/strategy must be implemented. Unless the Minister has approved the revised management plan/strategy, then the person taking the action must continue to implement the management plan/strategy originally approved, as specified in the conditions.	Not applicable	No changes to any management plans or strategies have been requested by DCCEEW to date.

Condition Number	Condition	Status	Evidence/Comments
18	If, at any time after five years from the date of this approval, the person taking the action has not substantially commenced the action, then the person taking the action must not substantially commence the action without the written agreement of the Minister.	Not applicable - Completed	Contingency condition not required as Action was substantially commenced in 2013.
19	Unless otherwise agreed to in writing by the Minister, the person taking the action must publish management plans and the strategy referred to in these conditions of approval on their website. Each management plan and strategy must be published on the website within one month of being approved.	Compliant	All required management plans are published on the Main Roads website (at location below). Construction Project Compliance Reports Main Roads Western Australia
20	For the better protection of Keighery's Macarthuria, the person taking the action must prepare and submit to the department a Keighery's Macarthuria Offset and Management Plan (KMOMP) to address impacts to Keighery's Macarthuria occurring as a result of construction and operation. The KMOMP must include but not necessarily be limited to: a) a commitment to establish, secure and maintain a viable population of at least 635 individuals of Keighery's Macarthuria within the recipient site; b) detailed methodology, sequencing and timing for translocation of individuals, rootstock and/or seedbank from the donor site to the recipient site that: i. describes measures to ensure the recipient site is suitable habitat for Keighery's Macarthuria on the basis of equivalent soil type, topography, slope, aspect, micro-hydrology and surrounding vegetation to the donor site and is appropriately prepared and secured (e.g fencing, lack of debris) to receive translocated individuals,	Non Compliant	A Keighery's Macarthuria Offset and Management Plan (KMOMP) was submitted and subsequently approved by DotEE (now DCCEE) on 8 October 2013. The KMOMP has been implemented, although the objective hasn't been achieved at this point in time. Main Roads reported in the 2024 ACR that the KMOMP had not been successful. This lack of success was largely due to the biology of Keighery's Macarthuria, which is a disturbance specialist, fire ephemeral species that spends much of its life cycle underground, waiting for stimulus to emerge. Keighery's Macarthuria plants also live for a short time (two to three years), which is not ideal for monitoring translocations and makes demonstrating

Condition Number	Condition	Status	Evidence/Comments
	rootstock and/or seedbank; ii. demonstrates activities will be undertaken in accordance with the Guidelines for the translocation of threatened plants in Australia (1998), Australian Network for Plant Conservation, Canberra with any deviations clearly identified and justified; iii. provides detailed maps of the current location of known Keighery's <i>Macarthuria</i> in relation to construction activities and the locations that translocation is intended to occur within the recipient site showing the relevant boundaries of protected/conservation areas in relation to these and all relevant connectivity to existing populations; iv. identifies all critical risk and success factors related to translocation (e.g mechanised or hand transplanting technique; seed storage conditions and durations; depth of planting; planting density) and how these shall be managed to maximise the successful re-establishment of Keighery's <i>Macarthuria</i> at the recipient site and minimise adverse impacts upon the extant environment at the recipient site; and v. ensures individuals from the donor site and/or insurance population (see below) are planted within the recipient site within 18 months from the commencement of removal of any individuals of Keighery's <i>Macarthuria</i>; c) detailed methodology, sequencing and timing for development, maintenance and use of an off-site insurance population that represents the genetic diversity removed from the donor site and is of sufficient size and health that it can be used to		establishment challenging. On 31 March 2025 Main Roads received a request for information (RFI) from the Department regarding the potential non-compliance with Condition 20 reported in the 2024 ACR. Main Roads provided a response with the relevant information to the Department on 24 April 2025. Main Roads completed a survey of the translocation area in April 2025 that confirmed that of the 1595 plants that were propagated and translocated to the site, there were no remaining <i>Macarthuria keigheryi</i> present. To investigate alternative offset options to address difficulties meeting Condition 20, Main Roads commenced discussions with DBCA. One of the options discussed is the development of a 'species conservation plan' for <i>Macarthuria keigheryi</i>. Main Roads subsequently met with the Department on 9 May 2025 to discuss the RFI response and options to meet the condition requirements. After reviewing a range of information, and after discussions with Main Roads (on 9

Condition Number	Condition	Status	Evidence/Comments
	supplement translocation as described in 20c) to establish a viable population of the specified size; d) measures to ensure that insurance population plants are propagated to a level of plant health and fecundity where there is an extremely low likelihood of plants dying prior to any removal of plants at the donor site occurring1: e) measures to ensure that the insurance population contains sufficient numbers to: safeguard against the complete loss of all individuals at the recipient site following translocation; and the balance of individuals required to achieve a conservation gain at the recipient site in accordance with the department's Environmental Offsets Policy (2012) including allowances for any losses under field conditions; f) commitment that the insurance population will be established prior to the removal of any Keighery's Macarthuria plants from the donor site and that the insurance population will not be discontinued unless agreed to in writing from the department; Note: The department's agreement to a discontinued insurance population is reliant upon persistence of a viable population of at least 635 Keighery's Macarthuria at the recipient site. g) measures to ensure that any individuals of Keighery's Macarthuria at the donor site or recipient site or any other area containing Keighery's Macarthuria otherwise affected by construction and operation are managed in full accordance with the requirements of the Keighery's Macarthuria Recovery Plan; and h) details for recording, monitoring, cataloguing and sharing data		May 2025) the Department initiated a Directed Variation as per their letter of 23 July 2025 to replace Condition 20 and allow for the revision of the Keighery's Macarthuria Offset Management plan. The intent of the revised Offset Management Plan and Conditions of Approval will be to appropriately account for and mitigate the impact on the species going forward from the current status quo. Main Roads provided a letter of support for this approach to the Department on 3 August 2025. The variation is with the Department to progress. The likely approach to revise offset strategy will be to develop a 'species conservation plan' in consultation with DBCA. DBCA has indicated verbally that they are supportive of the proposed 'species conservation plan' approach. Main Roads met with DBCA in October 2025 to discuss development of the revised offset strategy.

Condition Number	Condition	Status	Evidence/Comments
	and information of the translocation of Keighery's Macarthuria from the donor site to the recipient site and the application of an insurance population at a standard suitable for publication in a peer reviewed scientific publication. Such information must be provided to government agencies upon request. The KMOMP must be approved by the minister prior to the removal of any individuals of Keighery's Macarthuria. The KMOMP must be implemented as approved.		