Government of Western Australia
Department of Water and Environmental Regulation

Clearing Permit Decision Report

1 Application details and outcome

1.1. Permit application details

Permit number:	CPS 11204/1
Permit type:	Purpose permit
Applicant name:	Co-Operative Bulk Handling Limited
Application received:	31 July 2025
Application area:	2.16 hectares of native vegetation (revised)
Purpose of clearing:	Railway construction
Method of clearing:	Mechanical
Property:	Railway Land ID 3111247 Railway Land ID 3124108 Lot 127 on Deposited Plan 428813
Location (LGA area/s):	Shire of Wongan- Ballidu
Localities (suburb/s):	Ballidu

1.2. Description of clearing activities

Co-Operative Bulk Handling Limited (CBH) proposed to clear 2.20 hectares of native vegetation with Railway Land ID 3111247, Railway Land ID 3124108 and Lot 127 on Deposited Plan 428813, Ballidu. The vegetation proposed to be cleared is distributed across six separate areas (see Figure 1, Section 1.5). The purpose of the clearing is to expand the Ballidu grain terminal site. The area of clearing is required to establish a new rail siding adjacent to the mainline to enable the efficient transportation of grain from Ballidu to Port via rail. The northernmost area of clearing is required to establish an access road connecting the existing CBH Ballidu site with the proposed rail siding facility.

On 24 December 2025, the applicant requested to reduce the application area from 2.20 hectares to 2.16 hectares based on design refinements to reduce the impacts to critical habitat for *Grevillea dryandroides* subsp. *dryandroides* in response to DWER's request for further information (RFI) letter dated 23 September 2025.

1.3. Decision on application

Decision:	Granted
Decision date:	22 July 2026
Decision area:	2.16 hectares of native vegetation, as depicted in Section 1.5, below.

1.4. Reasons for decision

This clearing permit application was submitted, accepted, assessed and determined in accordance with sections 51E and 51O of the *Environmental Protection Act 1986* (EP Act). The Department of Water and Environmental Regulation (DWER) advertised the application for 21 days and no submissions were received.

In making this decision, the Delegated Officer had regard for:

- avoidance and minimisation actions implemented by the applicant along with consideration of alternative sites (see Section 3.1),
- the site characteristics (see Appendix B),
- relevant datasets (see Appendix G.1),
- the findings of biological surveys of the application area and surrounds (see Appendix F),
- expert advice received from the Department of Biodiversity, Conservation and Attractions (DBCA),
- the clearing principles set out in Schedule 5 of the EP Act (see Appendix C),
- the applicant's efforts to avoid, minimise, mitigate and offset the environmental impacts of the proposed clearing in accordance with the *WA Environmental Offsets Guidelines* (2014) mitigation hierarchy, and
- relevant planning instruments and any other matters considered relevant to the assessment (see Section 3).

The Delegated Officer also took into consideration the need and justification of the proposed clearing including the following:

- clearing to facilitate the Ballidu Rail Project, (the Project) which has been identified as a key Network Site in the Kwinana North Zone that has been prioritised for rail out-loading investment through the Agricultural Supply Chain Initiative (ASCI). ASCI is a jointly funded State and Federal program to boost road and rail capacity to deliver a more efficient supply chain to port during peak export times.
- the Project provides key supply chain benefits in line with CBH's strategic objectives including:
    - Additional peak export capacity of approximately 20,000-25,000 tonnes (t) per month driven by a significant increase in rail out-loading capability at Ballidu which will facilitate loading/shunting of a 52-wagon train in approximately four hours representing an approximately seven-hour reduction in site dwell time from the current state.
    - Incremental export revenue associated with shifting approximately 4,500-5,000t per month (approximately 27,000t in one-hour).
- Operational efficiencies: will reduce site staffing and road resource requirements (currently compensating inefficient rail) and improve the sustainability of rail out-loading operations on site. This will reduce road transport, which is expected to be the largest operational benefit.
- Community/safety benefits: As a result of a reduction in road out-loading requirements, taking trucks off the road, improving safety and providing environmental benefits associated with less emission intensive rail movements

The assessment identified that the proposed clearing would result in the following environmental impacts:

- the loss of 2.16 hectares of native vegetation that is representative of BVA 1024 and a significant remnant of vegetation in an extensively cleared landscape (3.42 per cent vegetation remaining within the local area),
- the loss of 0.11 hectares of critical habitat for Critically Endangered *G. dryandroides* subsp. *dryandroides,*
- the loss of native vegetation that provides suitable habitat for shield-backed trapdoor spider and tree-stem trapdoor spider*,*
- the loss of 1.79 hectares of native vegetation that is suitable foraging habitat for Carnaby's cockatoo (*Zanda latirostris)*,
- the loss of suitable habitat for priority (P) flora species,
- the potential impacts to fauna if present at the time of clearing, and
- the potential introduction and spread of weeds into adjacent vegetation, which could impact on the quality of the adjacent vegetation and its habitat values.

After consideration of the available information, as well as the applicant's minimisation and mitigation measures (see Section 3.1), the Delegated Officer determined that the loss of suitable habitat for priority flora does not represent a significant risk to the ongoing maintenance of priority flora species. The Delegated Officer considered that direct impacts to fauna present at the time of clearing and the potential spread of weeds, can be minimised and managed to be unlikely to lead to an unacceptable risk to environmental values through appropriate conditions on the clearing permit. However, impacts to native vegetation that is a significant remnant of vegetation in an extensively cleared landscape, critical habitat for threatened flora, and impact to low to moderate foraging habitat for Carnaby's cockatoo, remained significant even after the application of minimisation and mitigation measures, and constitutes a significant residual impact (SRI).

In accordance with the Government of Western Australia's *Environmental Offsets Policy* (2011) and *Environmental Offsets Guidelines* (2014), the Delegated Officer determined that the following land acquisition and vegetation management offsets are required to address the above SRI's:

- conservation of 4.67 hectares of native vegetation within Lot 27 on Deposited Plan 428813, Ballidu, to be conserved in perpetuity;

- the revegetation of 1.65 hectares of cleared and Completely Degraded condition vegetation to a Good or better (Keighery, 1994) condition within Lot 27,
- The rehabilitation of 3.66 hectares of Degraded to Good (Keighery, 1994) condition vegetation to a Good and Very Good (Keighery, 1994) condition within Lot 27.

It is considered for the restoration and offset areas within Lot 27 to consist of:

- 3.90 hectares of vegetation that provides suitable habitat for *G. dryandroides* subsp. *dryandroides,*
- 5.02 hectares of vegetation that provides moderate to low value foraging habitat for Carnaby's cockatoo, and
- 5.20 hectares of vegetation that is a significant remnant in an extensively cleared landscape and represents the BVA 1024.

The Delegated Officer determined that the above offset was sufficient to counterbalance the SRI's associated with this project. Further information on the suitability of offsets provided are summarised in Section 4.

The Delegated Officer notes that the assessment against Clearing Principle (e) has determined that the proposed clearing is seriously at variance with this clearing principle (see Section 3.2 for the detailed assessment). Under Section 51O(3) of the EP Act, the DWER's Chief Executive Officer (CEO) may approve clearing which is seriously at variance with a clearing principle if, in the CEO's opinion there is a good reason for doing so. In this instance, the CEO considers that the following good reasons exist for granting a clearing permit:

- the project will:
    - increase supply chain benefits and grower value,
    - community and safety benefits: taking trucks off the road, improving safety and providing environmental benefits associated with less emissions and intensive rail movements,
    - operational benefits by reducing site staffing and road resource requirements to improve the sustainability of rail out-loading operations onsite,
- the impacts of clearing have been avoided, minimised, and mitigated to the extent practicable (See Section 3.1), and
- the significant residual impacts of the clearing have been appropriately offset in accordance with the *WA Offsets Policy 2011, WA Environmental Offsets Guidelines 2014*, and WA State Environmental Offsets Metric and will result in the protection and rehabilitation of at least 5.2 hectares of native vegetation.

In making this decision the CEO also considered the cumulative impacts associated with this application and nearby development approved and proposed under Part V of the EP Act. The Delegated Officer considered that the cumulative impacts to the above environmental values are not at a level that would warrant a decision to allow no further clearing of these values, subject to these impacts being appropriately addressed and managed.

The Delegated Officer decided to grant a clearing permit subject to conditions to:

- avoid, minimise to reduce the impacts and extent of clearing
- take hygiene steps to minimise the risk of the introduction and spread of weeds,
- undertake slow, progressive one directional clearing to allow fauna to move into adjacent habitat ahead of the clearing activity,
- restrict clearing within buffers of the *G. dryandroides* subsp. *dryandroides* individuals as identified on Figure 7,
- ensure priority flora management measures are undertaken,
- implement trapdoor spider management conditions within the buffers of recorded active burrows as identified in Figure 5; and
- implement environmental offsets (land acquisition, revegetation and rehabilitation) as outlined above.

1.5. Site map

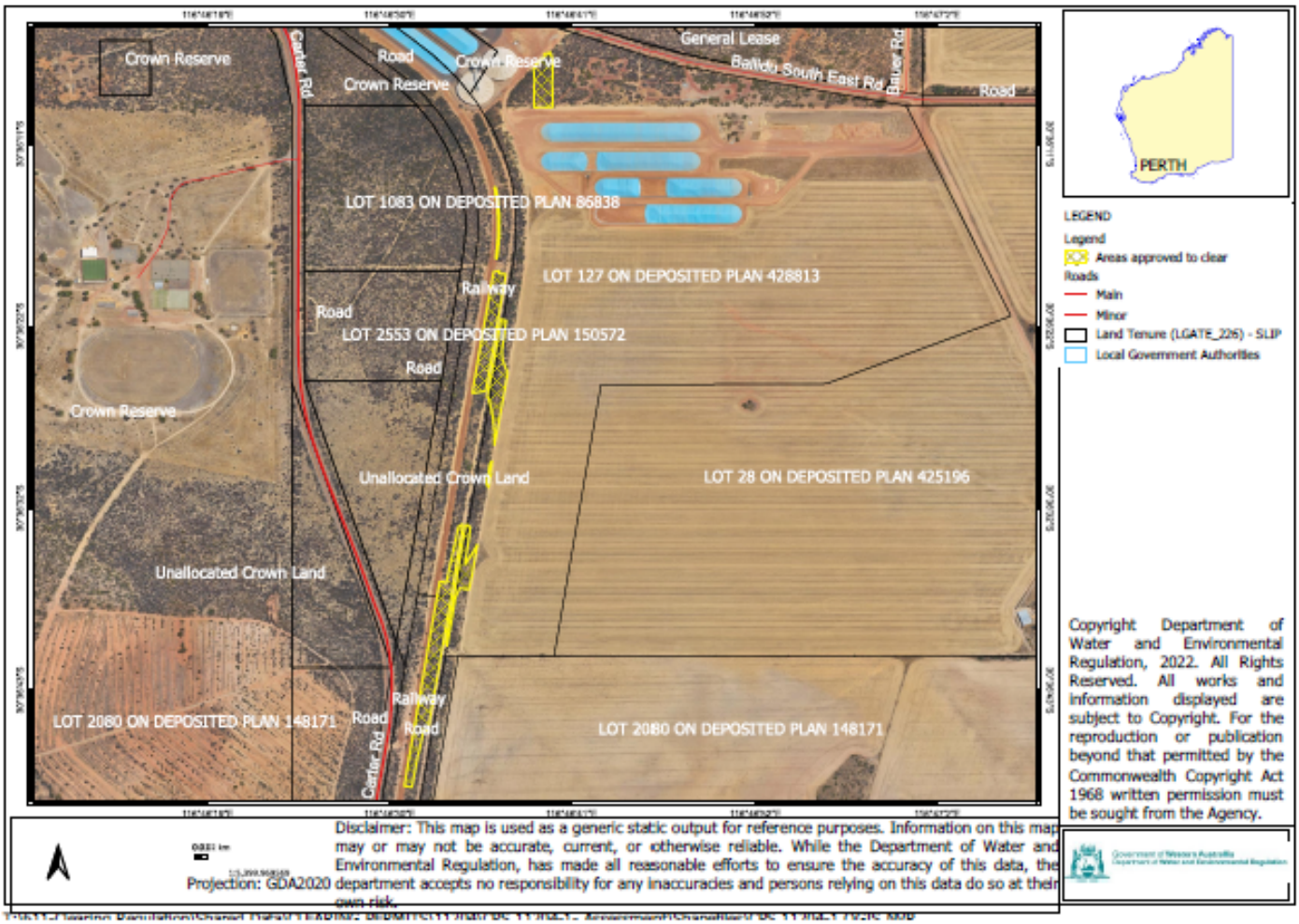


Figure 1. Map of the application area. The areas crosshatched yellow indicate the areas authorised to be cleared under the granted clearing permit.

2 Legislative context

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 (see Section 1.4), the Delegated Officer has also had regard to the objects and principles under section 4A of the EP Act, particularly:

- the precautionary principle
- the principle of intergenerational equity
- the polluter pays principle
- the principle of the conservation of biological diversity and ecological integrity.
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Other legislation of relevance for this assessment include:

- *Biodiversity Conservation Act 2016* (WA) (BC Act)
- *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act)
- *Planning and Development Act 2005* (WA) (P&D Act)

Relevant policies considered during the assessment include:

- *Environmental Offsets Policy* (2011)

The key guidance documents which inform this assessment are:

- *A guide to the assessment of applications to clear native vegetation* (DER, December 2013)
- *Procedure: Native vegetation clearing permits* (DWER, October 2019)
- *Environmental Offsets Guidelines* (August 2014)

- Technical guidance – *Flora and Vegetation Surveys for Environmental Impact Assessment* (EPA, 2016)
- Technical guidance – *Terrestrial Fauna Surveys for Environmental Impact Assessment* (EPA, 2016)

3 Detailed assessment of application

3.1. Avoidance, minimisation and mitigation measures

The applicant has advised the following avoidance, minimisation and mitigation measures have been undertaken (CBH, 2025; 2026):

- The application area has been reduced from 2.2 hectares to 2.16 hectares of native vegetation to reduce disturbance of the buffer of the *G. dryandroides* subsp. *dryandroides* individual at Location 1 of Figure 2,
- A total of 11 design options has been considered during the design process during which efforts were made to minimise the impacts on native vegetation especially regarding:
    - priority flora,
    - exceed 'assigned' levels of noise emissions,
    - environmental sensitive areas,
- Option 6B was chosen after consultation with ARC Infrastructure as this was the preferable design due to the opportunity to minimise impacts to sensitive environmental areas and deliver the best safety outcomes for rail operations.

The applicant has also provided a Construction Environment Management Plan (CEMP) to ensure the mitigation of risks to the environment during clearing and construction of the railway are appropriately managed (CBH, 2026d). The key management factors addressed in the CEMP include but are not limited to:

- All vehicles, plant and equipment will arrive to site clean, free of soil and organic matter.
- Prior to clearing activities, areas to be cleared must be surveyed and clearly delineated.
- To mitigate the risk of trampling from unauthorised access to trapdoor spider burrows, 'No Go Zones' will be established around the known burrows. Access to these areas will be restricted to personnel authorised by the CBH Environmental Team only and any unauthorised access will be recorded as an incident and reported to the Project Manager.
- Clearing will be undertaken progressively towards remnant vegetation to allow fauna to move away from clearing activities.
- Fauna spotter to be present during clearing of native vegetation to supervise the dispersal/relocation of any fauna, and identification of any potential injured fauna, and
- A Tree Protection Zone (TPZ) is to be established for any trees on the construction site that are to be protected, in accordance with Australian Standard AS4970-2009. This is to be fenced off or barricaded where possible to ensure construction activities do not cause damage to the root plate of the tree. Where barricading is not possible, a spotter will be in place when plant is in operation that is posing a risk of unauthorised damage to vegetation.

The applicant has provided a Weed and Hygiene Management Plan (WHMP) (CBH, 2026e). Key management factors addressed in the WHMP include but are not limited to:

- Preconstruction survey including a baseline survey of the WHMP,
- Post construction survey to be conducted in the first late winter/early spring growth season,
- Demarcation of a hygiene line around the WHMP boundary, and
- Soil movement to be undertaken in consultation with an environmental specialist.

Grevillea dryandroides* subsp. *dryandroides

DWER advised through a request for further (RFI) letter sent on the 24 November 2025, that the *G. dryandroides* subsp. *dryandroides* individual at Location 2 on Figure 2 do not require a 50 metre buffer due to separation by existing road and rail infrastructure. However, due to the close proximity of the *G. dryandroides* subsp. *dryandroides* individual at Location 1 to the application area, it is advised that further management actions are required.

As a result, the applicant has committed to (CBH, 2026d):

- mitigating the risk of trampling from unauthorised access to the *G. dryandroides* subsp. *dryandroides*, by establishing a 'No Go Zone' around the known specimens at Location 1 and Location 2. Access to this area will be restricted to personnel authorised by the CBH Environmental Team only and any unauthorised access will be recorded as an incident and reported to the Project Manager,
- A 20 kilometre per hour speed limit will be enforced for any vehicle and plant movement within the 50 metres of the *G. dryandroides* subsp. *dryandroides,*
- Shade cloth will be applied to 'No Go Zone' fencing to minimise impact from dust, and

- Seed from soil collection will be undertaken as well as relocation of topsoil from the disturbance footprint into the Restoration Area.

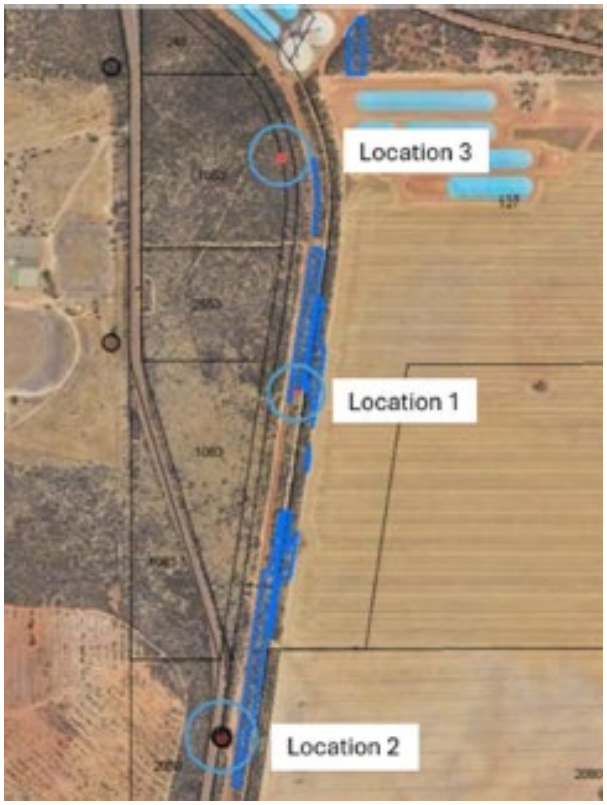


Figure 2. Map showing locations of *G. dryandroides* subsp. *dryandroides* records. The 50-metre buffer of individuals is shown in light blue.

In response to DWER's RFI letter to further reduce impacts to the 50 metre buffer of the *G. dryandroides* subsp. *dryandroides* individual, CBH (2026a) advised the following two design options to further minimise potential impacts:

- Design Option 1: involves reducing the Disturbance Footprint to the north of the *G. dryandroides* subsp. *dryandroides* individual, to create a minimum separation distance of 44 metres. This option requires the least amount of total clearing (2.16 hectares),
- Design Option 2: allows for a 50 metre separation distance to be achieved to the north, however, to accommodate the redesign of the drain, an additional strip of construction will be required. This option requires the most amount of clearing (2.21 hectares).



Figure 3. Design Option 1 identifying the reduced clearing within the 50 metre buffer of the *G. dryandroides* subsp. *dryandroides* individual (CBH, 2026a).



Figure 4. Design Option 2 identifying the additional clearing area to the north of the *G. dryandroides* subsp. *dryandroides* individual (CBH, 2026a).

Advice from DBCA (2026) advised that Option 2 would not be preferred due to the proposed increased clearing area impacting further significant remnant vegetation to the northwest. As a result of this advice, the applicant amended the application area consistent with Option 1 (Figure 3), reducing the impact to the 50 m buffer to the threatened flora by 0.04 hectares.

CBH (2025) advised the revegetation and rehabilitation of 1.31 hectares of native vegetation that is representative of suitable habitat for this species will also be undertaken within the Restoration Area (see Figure 5)

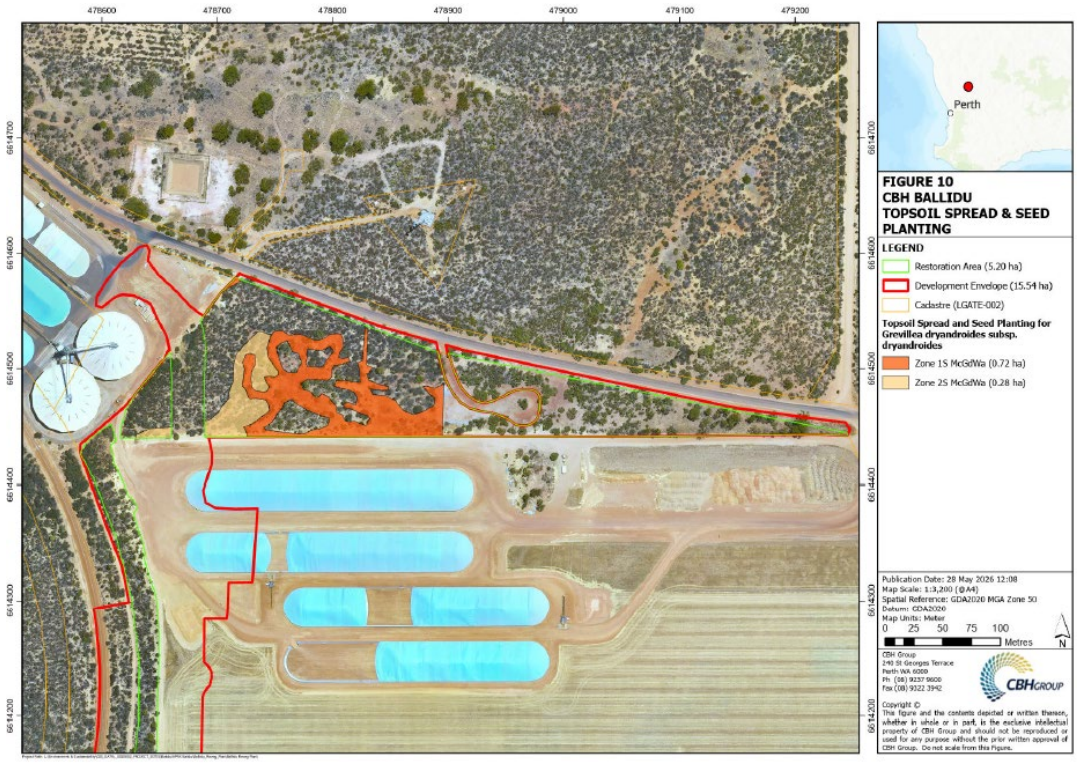


Figure 5. Topsoil spread and seed planting for *G. dryandroides* subsp. *dryandroides* as part of the Restoration Management Plan (CBH, 2026b)

After consideration of avoidance, minimisation and mitigation measures, it was determined that an offset to counterbalance the significant residual impacts to biological values (flora and fauna) and significant remnant vegetation were necessary. In accordance with the Government of Western Australia's *Environmental Offsets Policy* and *Environmental Offsets Guidelines*, these significant residual impacts have been addressed through the conditioning of environmental offset requirements on the permit. The nature and suitability of the offset provided are summarised in Section 4.

3.2. Assessment of impacts on environmental values

In assessing the application, the Delegated Officer has had regard for the site characteristics (see Appendix B) and the extent to which the impacts of the proposed clearing present a risk to biological, conservation, or land and water resource values.

The assessment against the clearing principles (see Appendix C) identified that the impacts of the proposed clearing present a risk to biological values (fauna and flora) and significant remnant vegetation. The consideration of these impacts, and the extent to which they can be managed through conditions applied in line with sections 51H and 51I of the EP Act, is set out below.

3.2.1. Biological values (fauna) - Clearing Principles (a) and (b)

Assessment

The application area is located within the Avon Wheatbelt IBRA bioregion. According to available databases and a desktop assessment, three conservation significant fauna species have been recorded within the local area (10-kilometre radius of the application area). The application area may provide habitat for the following fauna species:

- *Idiosoma nigrum* (shield-backed trapdoor spider) EN
- *Idiosoma castellum* (tree-stem trapdoor spider) P4
- *Zanda latirostris (*Carnaby's cockatoo) EN

This assumption is based on the habitat requirements, distribution, mapped vegetation types and the condition of the vegetation within the application area. Photos provided by AECOM (2023) identified that the vegetation within the proposed area is largely consistent with the mapped vegetation types for the area, consisting of Shrublands, Mallee Woodlands and Heathland (AECOM, 2023).

Available datasets did not identify any records of Carnaby's cockatoo or Tree-stem trapdoor spider within the local area. However, a Level 1 Fauna Assessment, Black Cockatoo and Targeted Trapdoor Spider Assessment (Bamford, 2024) identified low to moderate foraging habitat for Carnaby's cockatoo within the Complex Shrubland and Open Woodland association mapped within the application area and identified trapdoor spider burrows within the Complex Shrubland association.

The Targeted Fauna Assessment (Bamford, 2024) identified four major Vegetation Substrate Associations (VSA) in relation to fauna habitat in the survey area, the VSA's identified are as follows:

- VSA 1 Cleared Paddocks: Weedy grasses and oats, with a ground cover of shrubs and herbs over red loam,
- VSA 2 Complex Shrubland: Low vegetation of sedges, small shrubs of *Hakea, Melaleuca, Conospermum (*smoke bush), *Calothamnus* sp. with emergent Sheoak and *Grevillea* sp. on shallow sandy clay soils,
- VSA 3 Eucalypt Open Woodland: *Eucalyptus salmonophloia* (Salmon gum) and *Eucalyptus salubris* (Gimlet) over salt bush, occasional *Acacia* sp. and weedy grasses on red loam, and
- VSA 4 Planted Trees: Planted species in open areas of township, *Eucalyptus camaldulensis* and *Eucalyptus* sp. *(*unidentified) over grassy weeds and red loam sand.

It is considered for the application area to consist majority of VSA2 (1.79 ha) with a small area to the north consisting of VS3 (0.37 ha).

Vegetation condition across the application area ranges from Degraded to Very Good (Keighery, 1994) condition, with the majority in a Very Good to Good condition. Degradation was caused by earthworks, partial clearing and edge effects from existing railway and road infrastructure (AECOM, 2023).

Shield-backed trapdoor spider

The Shield-backed trapdoor spider is a large sized spider species endemic to Western Australia (WA) (TSSC, 2013). The desktop assessment identified one record of this species mapped within the local area, located 9.5 kilometres from the application area. Shield-backed trapdoor spider's habitat is typically associated with Eucalyptus woodlands and *Acacia* vegetation as this species depends significantly on leaf litter and small twigs to construct its burrows (TSSC, 2013).

The Targeted Fauna Assessment (Bamford, 2024) identified four Shield-backed trapdoor spider burrows within the survey area, all within the Complex Shrubland habitat type (Bamford, 2024) (See Figure 6). Three of the burrows had spiders within them and are considered active burrows. One had a gecko within it at the time of survey (Bamford, 2024). Three of these burrows occur 150m to 200m from the area proposed to be cleared, surrounded by remanent vegetation and are not considered likely to be impacted by the proposed clearing. One spider burrow was recorded 32 metres from the area proposed to be cleared and is separated from the application area by the existing railway and road infrastructure (Figure 6).

Tree-stem trapdoor spider

The tree-stem trapdoor spider is a relatively small spider that grows to around 12 millimetres long. It is listed as a Priority 4 species and has been recorded approximately 24 kilometres from the application area. Tree-stem trapdoor spider builds easily recognised burrows against the stems of shrubs or trees and is only found in the Western Australian Wheatbelt. They live in clumped but sparsely distributed populations that are likely to reflect local soil types (DBCA, 2003).

The Targeted Fauna Assessment (Bamford, 2024) identified one burrow within 41 metres of the southern extent of the application area. However, due to a bend in the burrow it was unable to be identified if it was currently being utilised by a tree-stem trapdoor spider (Bamford, 2024). This burrow is separated from the application area by an existing railway and road.

Burrows of both spider species were found within the Complex Shrubland habitat type (VSA 2) within the survey area and this vegetation type is considered suitable habitat for these species. A total of 1.79 hectares of VSA 2 occur within the application area. Despite the extensive survey effort within the survey area and surrounding bushland, it is likely the trapdoor spiders do not occur at a high abundance and therefore any locations they occur are likely to be important for local populations (Bamford, 2024).

DBCA (2026) advice was obtained regarding the significance of impacts of the proposed clearing on habitat for the Shield Trapdoor spider and Tree-stem trapdoor spider. DBCA advised that considering the linear nature of the

clearing, the high potential for suitable habitat to occur beyond the application area (survey identified two additional burrows in adjacent vegetation outside of the railway corridor), a 50-metre buffer is required between the proposed clearing and the known recorded burrows to minimise indirect impacts to these species. In addition, connectivity between known burrows should be maintained. DBCA (2026) supported the revegetation of cleared areas as proposed by the applicant and also recommended the following:

- Clearly demarcate burrow locations in the field to avoid accidental disturbance; and
- Prevent the burial of burrows during clearing, earthworks and debris removal.

After a review of aerial imagery, it is not considered for the proposed clearing to significant impact connectivity between the recorded burrows as remnant vegetation will remain along and adjacent to, the western side of the railway corridor. While it is noted that the proposed clearing will occur within 32 metres and 41 metres of two of the recorded burrows, the proposed clearing is separated by an existing railway and road and therefore, it is not anticipated for the clearing to significantly impact these burrows.

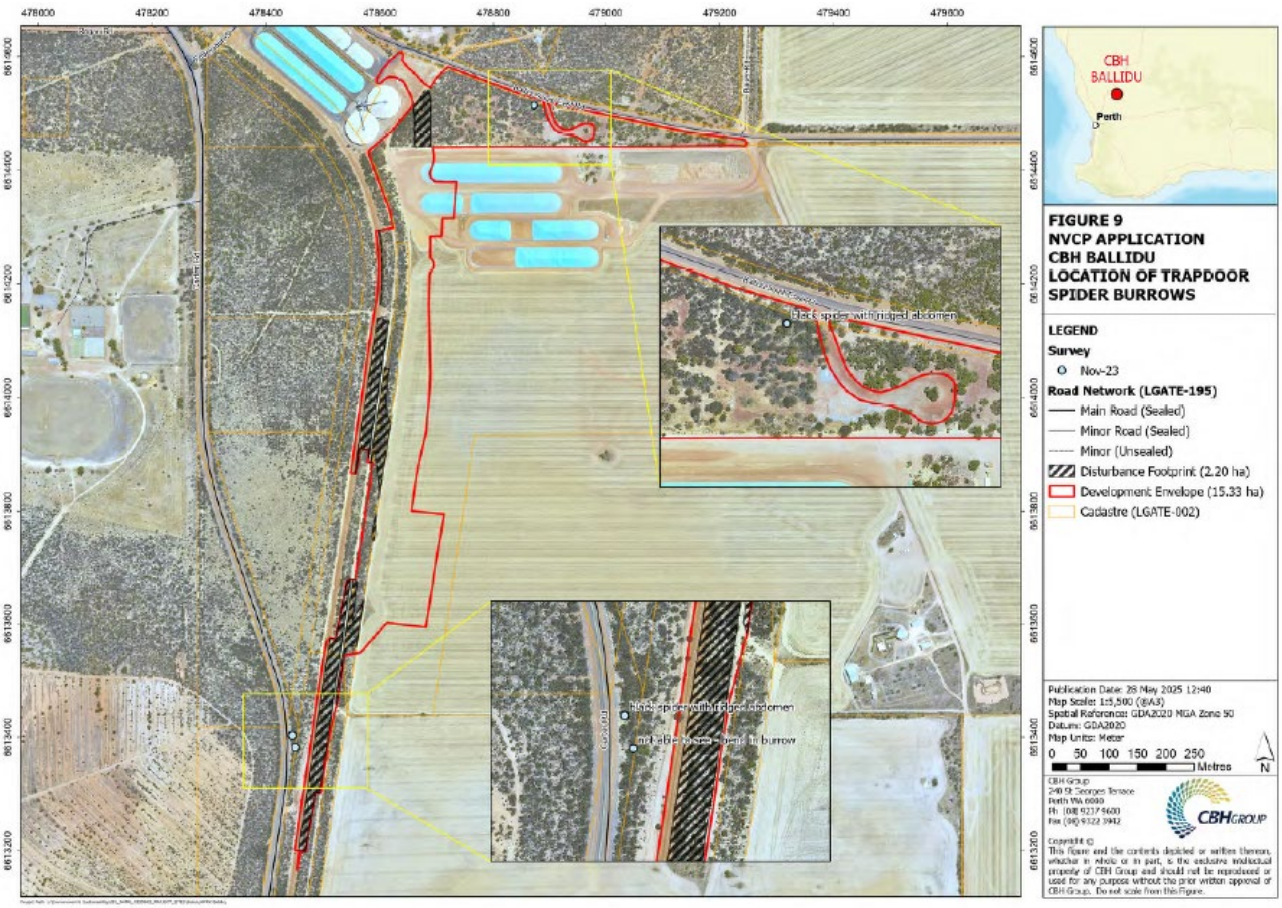


Figure 6. Location of trapdoor spider burrows identified within survey area (CBH, 2025a)

Carnaby's cockatoo

The Wheatbelt region contains open woodlands of eucalypt species that are known to be used by Carnaby's cockatoo for breeding. The application area is within the eastern boundary of the Carnaby's cockatoo's mapped distribution. The closest Carnaby's cockatoo record to the application area is 15 kilometres south, the closest known breeding site is 17.6 kilometres south west and the closest known roost site is 73 kilometres south west of the application area.

Breeding habitat

Breeding habitat for this species of black cockatoos is described within the 'EPBC Act referral guidelines for threatened black cockatoo species' (DAWE, 2022) which includes a list of tree species known to support breeding which either, have a suitable nest hollow or are of a suitable Diameter at Breast Height (DBH) to develop a nest hollow. For most tree species, suitable DBH is 50 centimetres (DAWE, 2022). Carnaby's cockatoo generally breed in woodland or forest, but also breed in former woodland or forest now present as isolated trees. They nest in hollows in live or dead trees of *Eucalyptus salmonophloia* (salmon gum), *Eucalyptus wandoo* (wandoo), *Eucalyptus gomphocephala* (tuart), *Eucalyptus marginata* (jarrah), *Eucalyptus rudis* (flooded gum), *Eucalyptus loxophleba*

subsp. *loxophleba* (york gum), *Eucalyptus accedens* (powder bark), *Eucalyptus diversicolor* (karri) and *Corymbia calophylla* (marri).

The Black Cockatoo Assessment (Bamford, 2024) identified 23 potential breeding trees within the survey area. These were located within VSA 3 and VSA 4. The majority of these were sufficient size but lacked hollows suitable for use by Carnaby's cockatoo (Bamford, 2024). None of these trees are located within the application area, therefore impacts to potential breeding from the proposed clearing is unlikely to occur.

Roosting habitat
Night roosts are typically located in the tallest trees within an area and are generally situated close to reliable food sources and water (DAWE, 2022). Findings from the Black Cockatoo Habitat Assessment (Bamford, 2024) indicate that the Open Woodland, VSA 3 has the potential to provide roosting habitat for Carnaby's black cockatoo. Several water sources occur near the application area, which increases the suitability of this vegetation type as potential roosting habitat (Bamford, 2024).

Given the absence of local records and the lack of evidence of use identified during the Black Cockatoo Habitat Assessment (Bamford, 2024), it is unlikely that Carnaby's cockatoos are currently using the application area for roosting.

Foraging habitat
Black cockatoos will generally forage up to 12 kilometres from an active breeding site (DAWE, 2022). Following breeding, they will flock in search of food, usually within six kilometres of a night roost (DAWE, 2022). Food resources within the range of breeding sites and roost sites are important to sustain populations, and foraging resources are therefore viewed in the context of known breeding and night roosting sites (DAWE, 2022). A review of available data has identified that no black cockatoo roost sites or breeding sites occurred within a 12-kilometre radius of the application area. The application area includes suitable foraging habitat for Carnaby's cockatoo, within the Complex Shrubland, VSA 2, consisting of small shrubs of *Hakea, Melaleuca, Conospermum*, *Calothamnus* sp. with emergent Sheoak and *Grevillea sp.* (1.79 hectares of the application area). These species are considered to be secondary foraging species and provide low to moderate quality foraging habitat. No Carnaby's black cockatoos, nor any evidence of their use of the application area were recorded during the Black Cockatoo Assessment (Bamford, 2024).

Black cockatoo populations have been substantially affected by historical habitat clearing, leading to fragmentation of breeding and foraging areas, loss of suitable nesting hollows, shifts in species distribution, and genetic isolation (DAWE, 2022). Consequently, remnant vegetation patches play an important role in maintaining habitat connectivity across the broader landscape.

Given the extensively cleared nature of the surrounding landscape, the remaining native vegetation in this region is of local significance. Therefore, the proposed clearing of 1.79 hectares of low to moderate foraging habitat for the Carnaby's cockatoo is considered a significant residual impact

The applicant has proposed to undertake revegetation within 5.02 hectares of low to moderate quality foraging habitat foraging habitat adjacent to the application area to mitigate impacts to Carnaby's cockatoo habitat.

Ecological linkage
Given the high level of historical clearing in the surrounding landscape, the application area may play a role in facilitating fauna movement across the landscape. However, as some vegetation will be retained within Lot 27 and the rail reserve following the proposed clearing, together with the implementation of 5.20 hectares of revegetation and rehabilitation proposed by CBH in adjacent remnant vegetation (refer to Section 3.1), the proposed clearing is not expected to result in a significant impact on local fauna linkages or dispersal values.

The proposed clearing may, however, lead to a decline in the condition of adjacent and nearby remnant native vegetation through the potential spread of weeds. These risks can be appropriately managed and mitigated through the application of permit conditions addressing weed management.

<u>Conclusion</u>
Based on the above assessment, the proposed clearing will result in the loss of native vegetation that contains low to moderate foraging habitat for Carnaby's cockatoo and suitable habitat for trapdoor spider species. Indirect Impacts to trapdoor spider burrows may occur through the spread of weeds and dust and accidental clearing. However, it is

considered that the risk of indirect impacts can be minimised and managed to unlikely lead to an unacceptable risk to environmental values through permit conditioning.

For reasons set out above, it is considered that the impacts of the proposed clearing to foraging habitat for Carnaby's cockatoo constitutes a SRI. In accordance with *the Government of Western Australia's Environmental Offsets Policy (2011*) and *Environmental Offsets Guidelines (2014),* this SRI has been addressed through the conditioning of environmental offset requirements, as outlined under Section 4.

Conditions

To address the above impacts, the following management measures will be required as conditions on the clearing permit:

- Directional clearing, which requires, slow progressive, one directional clearing to allow fauna to disperse ahead of the clearing activity should they occur on site at the time of clearing which will minimise impact to individuals,
- Trapdoor spider management measures for clearing within the 50 metre buffered areas,
- Onsite revegetation to improve the condition of 5.2 hectares of native vegetation that contains suitable habitat for trapdoor spiders and Carnaby's cockatoo.
- Offset- to conserve in perpetuity 4.67 hectares of native vegetation in at least Good to Very Good (Keighery, 1994) condition that provides foraging habitat for Carnaby's cockatoo, within Lot 27 on Deposited Plan 428813, Ballidu.

3.2.2. Biological values (flora) - Clearing Principles (a) and (c)

Assessment

The application is located within the Avon Wheatbelt IBRA bioregion. According to available databases 21 conservation significant flora species have been recorded within the local area (10-kilometre radius of the application area). Noting the findings of the Flora and Vegetation Assessment (AECOM, 2023), the site characteristics (Appendix B), and the habitat preferences of the conservation significant flora species recorded within the local area, the application area is considered to contain suitable habitat for the following Threatened and Priority flora species:

- *Acacia lirellata* subsp. *compressa,* (P2)
- *Acacia scalena,* (P3)
- *Dampiera glabrescens,* (P1)
- *Grevillea dryandroides* subsp. *dryandroides,* (CR)
- *Grevillea rosieri,* (P2) and
- *Verticordia venusta* (P3)

The Flora and Vegetation Assessment (AECOM, 2023) identified that the majority of vegetation within the survey area is in Good to Very Good (Keighery, 1994) condition and contains six vegetation types:

- AcBs, Open heathland: *Allocasuarina campestris, Melaleuca orbicularis* and *Styphelia crassiflora* tall open heathland over *Borya sphaerocephala, Ecdeiocolea monostachya* and *Mesomelaena preissii* tall sedgeland.
- AcDr, Shrubland: *Allocasuarina campestris, Hakea meisneriana* and *Melaleuca conothamnoides* tall shrubland over *Dianella revoluta, Pimelea imbricata* var. *piligera* and *Ricinocarpos undulatus* low sparse forbland.
- EpAcTp, Mid Mallee Woodland: *Eucalyptus phenax* subsp. *phenax* mallee woodland over *Allocasuarina campestris, Hibbertia exasperata* and *Chamelaucium brevifolia* tall to low open shrubland over *Trachymene pilosa, Dianella revoluta* and *Amphipogon caricinus* var *caricinus* low mixed grass and forbland.
- EwMhAs, Open Mallee Woodland: *Eucalyptus wubinensis, Eucalyptus moderata* and *Acacia yorkrakinensis* subsp. *acrita* mid open woodland over *Melaleuca hamata, Acacia mackeyana* and *Acacia acuaria* tall to low open shrubland over *Austrostipa scabra, *Pentameris airoides* and *Waitzia acuminata* var. *acuminata* tall to low mixed sparse grass and forbland.
- McEm, Tall Shrubland: *Melaleuca cordata, Allocasuarina campestris* and *Melaleuca conothamnoides* tall shrubland over *Ecdeiocolea monostachya, Platysace trachymenioides* and *Amphipogon amphipogonoides* mixed tall sedge, forb and low grassland.
  McGdWa, Tall Shrubland: *Melaleuca conothamnoides, Allocasuarina campestris* and *Grevillea paradoxa* tall shrubland over *Gahnia drummondii* low to tall open sedgeland over *Waitzia acuminata* var *acuminata, Trachymene pilosa* and *Platysace trachymenioides* low sparse forbland.

Priority flora

***Acacia lirellata* subsp. *compressa* (P2)**
Acacia lirellata subsp. *compressa* is a bushy procumbent spreading shrub that can grow to 0.5 metres high and 1.2 metres wide. Its flowers are yellow and appear June through September. *Acacia lirellata* subsp. *compressa* is commonly found on yellowy sand and clayey loam. It is mainly associated with open heathland of *Allocasuarina campestris, Melaleuca orbicularis* and *Styphelia crassiflora* tall open heathland over *Borya sphaerocephala, Ecdeiocolea monostachya* and *Mesomelaena preissii* tall sedgeland. *Acacia lirellata* subsp. *compressa* is known from five locations throughout the Wheatbelt (Western Australian Herbarium, 1998-).

The Flora and Vegetation Assessment (AECOM, 2023) identified 10 individuals of this species at one location within the survey area with the closest record occurring within two metres of the proposed clearing. The proposed clearing will impact the suitable habitat surrounding this population. The individuals were identified within the AcBs, McEm and McGdWa vegetation types within the survey area. The species is known from several records within the Wheatbelt and are noted to occur within areas subject to disturbance. As no individuals are proposed to be cleared, sufficient plants are likely to persist with the subpopulation and therefore the proposed clearing is unlikely to represent a significant impact to the local population, the regional population or the conservation status of the species (DBCA, 2025).

***Acacia scalena* (P3)**
Acacia scalena is an intricately branched, rigid and often straggly and prickly shrub that can grow 0.5 -1.5 metres high. Its flowers are yellow and appear June through to September. *Acacia scalena* is commonly found on yellow or yellow gravelly sand and loam. It is mainly associated with tall shrubland of *Melaleuca conothamnoides, Allocasuarina campestris* and *Grevillea paradoxa* tall shrubland over *Gahnia drummondii* low to tall open sedgeland over *Waitzia acuminata* var *acuminata, Trachymene pilosa* and *Platysace trachymenioides* low sparse forbland. *Acacia scalena* is known from five locations throughout the Wheatbelt (Western Australian Herbarium, 1998-).

The Flora and Vegetation Assessment (AECOM, 2023) identified 36 individuals of this species within the survey area with the closest record occurring within 12 metres of the proposed clearing. The proposed clearing will impact suitable habitat surrounding recorded individuals. The individuals were identified within the McGdWa, McEm and EpActTp vegetation types. The species is known from several records within the Wheatbelt and are noted to occur within areas subject to disturbance. As no individuals are proposed to be cleared, sufficient plants are likely to persist within this recorded subpopulation and therefore the proposed clearing is unlikely to cause significant impact to the local population, the regional population or the conservation status of the species (DBCA, 2025).

***Dampiera glabrescens* (P1)**
Dampiera glabrescens is an erect perennial herb that grows to approximately 0.5 metres high. It has purple-blue flowers that appear in September. *Dampiera glabrescens* is commonly found on grey/yellow sand and along roadsides and gravel pits. It is mainly associated with tall shrubland of *Melaleuca conothamnoides, Allocasuarina campestris* and *Grevillea paradoxa* tall shrubland over *Gahnia drummondii* low to tall open sedgeland over *Waitzia acuminata* var *acuminata, Trachymene pilosa* and *Platysace trachymenioides* low sparse forbland. *Dampiera glabrescens* is known from six locations within the northern Wheatbelt and Midwest (Western Australian Herbarium, 1998-).

The Flora and Vegetation Assessment (AECOM, 2023) identified 190 individuals of this species within the survey area with the closest record within 20 metres of the proposed clearing. The proposed clearing will impact the suitable habitat surrounding these individuals. The individuals were identified within the McGdWa and EpAcTp vegetation types within the survey area. The species is known from several records within the northern Wheatbelt and are noted to occur within roadside areas subject to disturbance. As no individuals are proposed to be cleared, sufficient plants are likely to persist with the subpopulation and therefore the proposed clearing is unlikely to represent a significant impact to the local population, the regional population or the conservation status of the species (DBCA, 2025).

***Grevillea rosieri* (P2)**
Grevillea rosieri is a low spreading to erect shrub that grows up to 0.5 metres tall. Its flowers are red and appear in July through to August. *Grevillea rosieri* is commonly found on sandy soils. It is mainly associated with tall Shrubland of *Melaleuca conothamnoides, Allocasuarina campestris* and *Grevillea paradoxa* tall shrubland over *Gahnia drummondii* low to tall open sedgeland over *Waitzia acuminata* var *acuminata, Trachymene pilosa* and *Platysace*

trachymenioides low sparse forbland. *Grevillea rosieri* is known from six locations in the Wheatbelt and Midwest (Western Australian Herbarium, 1998-).

The Flora and Vegetation Assessment (AECOM, 2023) identified this species in quadrat 1 in the survey area. The proposed clearing will impact suitable habitat surrounding individuals, with this occurrence being a range extension from the nearest subpopulation approximately 40 kilometres away from the application area. The population size was not provided in the report but a foliage cover of '0' was recorded, indicating the species was not present in high numbers. Based on the mapped location of quadrat 1, this species is far enough south from the application that impacts of the proposed clearing are unlikely to be significant. As no individuals are proposed to be cleared, sufficient plants are likely to persist with the subpopulation and therefore the proposed clearing is unlikely to represent a significant impact to the local population, the regional population or the conservation status of the species (DBCA, 2025).

Verticordia venusta (P3)
Verticordia venusta is an erect spreading shrub that grows up to two metres tall. It has pink-purple/ red-brown flowers that appear September through January. *Verticordia venusta* is commonly found on yellow sand and sandy gravel. It is mainly associated with open heathland of *Allocasuarina campestris, Melaleuca orbicularis* and *Styphelia crassiflora* tall open heathland over *Borya sphaerocephala, Ecdeiocolea monostachya* and *Mesomelaena preissii* tall sedgeland. *Verticordia venusta* is known from numerous locations around the northern Wheatbelt (Western Australian Herbarium, 1998-).

The Flora and Vegetation Assessment (AECOM, 2023) identified two individuals of this species at one location within the survey area with these records occurring within 37 metres of the application area. The proposed clearing will impact the suitable habitat surrounding these individuals. The species is known from several records within the Wheatbelt and are noted to occur within areas subject to disturbance. As no individuals are proposed to be cleared, sufficient plants are likely to persist with this subpopulation and therefore is unlikely to represent a significant impact to the local population, the regional population or the conservation status of the species (DBCA, 2025).

Threatened Flora

***G. dryandroides* subsp. *dryandroides* (CR)**
G. dryandroides subsp. *dryandroides* is a root suckering shrub that grows up to 0.5 metres tall. It usually forms colonies of less than five plants or is scattered singly amongst associated vegetation. The leaves are dull, yellow-green, each with leaf lobes five to 15 millimetres long (Western Australian Herbarium, 1998-).

G. dryandroides subsp. *dryandroides* is endemic to Western Australia where it is confined to the Ballidu area. It is known from five populations that include 115 plants. *G. dryandroides* subsp. *dryandroides* is found in open heath on grey sandy loam and yellow gravelly sand, with shrubs of *Allocasuarina* and *Melaleuca*, none of which occur within conservation tenure (DBCA, 2025).

The Flora and Vegetation Assessment (AECOM, 2023) identified one individual of this species which has not been recorded before. It is likely that this individual would be considered part of existing sub population 3C located in the vicinity of the proposed clearing. This population was last surveyed in 2015 by DBCA, with no individuals identified at the time of the survey, therefore it is likely that this individual has germinated from soil stored seed, which demonstrates the importance of retaining soil stored seed for this species (DBCA, 2025).

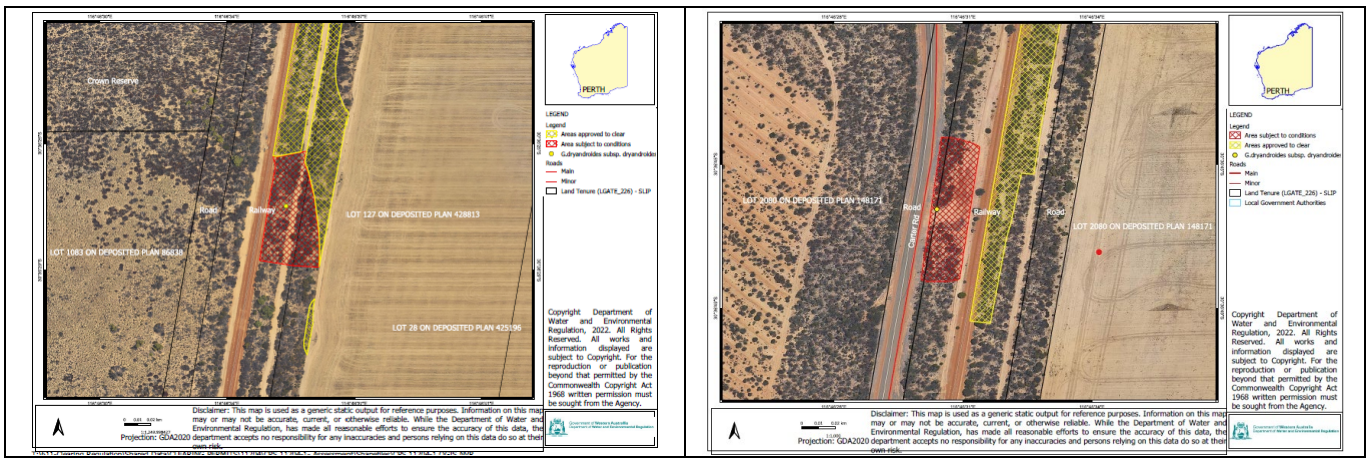
Critical habitat for *G. dryandroides* subsp. *dryandroides* is habitat identified as being critical to the survival of the species and comprises of (DBCA, 2025):

- The area of occupancy of the known populations,
- Areas of similar habitat, for example, open heath on grey sandy loam and yellow gravelly sand, with shrubs of *Allocasuarina* and *Melaleuca*, within 200 metres of known populations (these provide potential habitat for natural range extension),
- Corridors of remnant vegetation that link populations (these are necessary to allow pollinators to move between populations and are usually road and rail verges), and
- Additional occurrences of similar habitat, for example, open heath on grey sandy loam and yellowy gravelly sand, with shrubs of *Allocasuarina* and *Melaleuca.*

Given that the proposed clearing contains vegetation that is representative of suitable habitat for this species, occurs within a corridor of remnant vegetation within an extensively cleared landscape and consist of an area that is known to be occupied by this species, it is considered for the vegetation under application to represent critical habitat for *G. dryandroides* subsp. *dryandroides.*

The proposed clearing within the 50 metre buffer of the individual identified during the flora survey located at location 1 (see Figure 7) is considered to impact possible soil stored seeds and therefore the clearing of approximately 0.11 hectares of native vegetation that is critical habitat within the 50 metres buffer of this *G. dryandroides* subsp. *dryandroides* individual is considered a significant residual impact.

The desktop assessment identified one existing record of *G. dryandroides* subsp. *dryandroides* adjacent to the southern extent of the application area. It was noted that the 50-metre buffer of this record intersected the application area, however as it is separated by road and rail infrastructure, the proposed clearing Is unlikely to significantly impact the persistence of this individual at this location (Location 2, Figure 7).



Location 1 **Location 2**

Figure 7. Records of *G. dryandroides* subsp. *dryandroides* individuals in which flora management conditions apply.

Conclusion

Based on the above assessment, the proposed clearing will result in the loss of suitable habitat for priority flora species, however, for the reasons set out above, it is considered that the proposed clearing of priority flora habitat does not represent a significant impact at species or local level. Based on the avoidance and minimisation measures proposed by the applicant, and expert advice received from DBCA, it is considered that the impacts of the proposed clearing on priority flora species can be managed through permit conditioning and by implementing appropriate construction and design methods to maintain surface drainage patterns, as well as dust and weed control measures.

Based on the above assessment, the proposed clearing will result in the loss of 0.11 hectares of critical habitat for the threatened flora species, *G. dryandroides* subsp. *dryandroides*. For the reasons set out above, it is considered that impacts of the proposed clearing on habitat for *G .dryandroides* subsp. *dryandroides* constitutes a SRI. In accordance with the Government of Western Australia's *Environmental Offsets Policy* (2011) and *Environmental Offsets Guidelines* (2014), this SRI has been addressed through the conditioning of environmental offset requirements, as outlined under Section 4.

Based on the avoidance and minimisation measures proposed by the applicant, and expert advice received from DBCA, it is considered that the impacts of the proposed clearing on the threatened flora species individuals can be managed through permit conditioning and by implementing appropriate construction and design methods as per the CEMP.

Conditions

To address the above impacts, the following management measures will be required as conditions on the clearing permit:

- Flora management- demarcate locations of *G. dryandroides* subsp. *dryandroides* individuals and buffer areas prior to clearing and ensure no clearing of individual occur. Ensure measures are put in place to prevent disturbance, access, altered drainage, erosion or weeds within buffer areas.

- Flora management- demarcate locations of priority flora that occur within 20 metres of the clearing area and ensure no clearing of priority flora occur.
- Weed and hygiene management measures requiring the permit holder to take hygiene steps to minimise the risk of the introduction and spread of weeds to adjacent vegetation,
- Onsite revegetation of 5.2 hectares of native vegetation to improve the condition of suitable habitat for priority and threatened flora species.
- Offset- to conserve in perpetuity 4.67 hectares of native vegetation in at least Good to Very Good (Keighery, 1994) condition that contains suitable habitat for *G. dryandroides* subsp. *dryandroides*, within Lot 27 on Deposited Plan 428813, Ballidu.

3.2.3. Significant remnant vegetation - Clearing Principle (e)

Assessment

The national objectives and targets for biodiversity conservation in Australia has a target to prevent clearance of ecological communities with an extent below 30 per cent of that present pre-1750, below which species loss appears to accelerate exponentially at an ecosystem level (Commonwealth of Australia, 2001).

The application area is located within the Avon Wheatbelt IBRA bioregion which retains approximately 18.51 per cent of its pre-European vegetation extent (Government of Western Australia, 2019). In addition, the vegetation extent in the local area falls below the national targets, with approximately 3.42 per cent of pre-European vegetation extent remaining within a 10-kilometre radius of the application area.

The application area is mapped as Beard Vegetation Association (BVA) 1024 which also has an extent lower than the 30 per cent threshold, both statewide and within the Avon Wheatbelt IBRA bioregion (see Appendix B.2). A Flora and Vegetation survey (AECOM, 2023) confirmed that the vegetation within the application area consists of native vegetation that is representative of this highly cleared BVA and occurs in Good to Very Good (Keighery, 1994) condition.

Noting the above native vegetation extents, the clearing of native vegetation within the application area is inconsistent with the national objectives and occurs within an extensively cleared landscape.

The vegetation within the application area is considered to contribute to a northwest - southeast fauna linkage that exist along the Northam-Pithara Rail Reserve. The proposed clearing will further contribute to fragmentation, in parts, within this rail reserve. The vegetation under application also represents critical habitat for threatened flora, habitat for priority flora, provides significant habitat for Carnaby's cockatoo and trapdoor spiders and is considered to contain high biodiversity (see Sections 3.2.1 and 3.2.2). Given this, the application area is considered a significant remnant of native vegetation.

According to the '*A guide to the assessment of applications to clear native vegetation'* (DER, 2013), clearing principle (e) aims to maintain sufficient native vegetation in the landscape for the maintenance of ecological values. It also recognises the need to protect ecological communities that have been extensively cleared and to retain a representation of each ecological community in local areas throughout its pre-European range. It also applies to landscapes where remaining vegetation plays a critical role in sustaining ecosystem functions or to compensate for a high degree of fragmentation (such as the Wheatbelt region).

Given the biological values present within the application area and that there is 3.42 per cent remnant vegetation remaining within the local area, the proposed clearing is considered to be 'seriously at variance' to clearing principle (e).

The proposed clearing will also increase the risk of the introduction and spread of weeds into adjacent vegetation which is considered to consist of similar values. Weed and hygiene management measures would assist to minimise this risk.

Noting the above, the proposed clearing will result in the loss of 2.16 hectares of native vegetation that is considered significant native vegetation within an area that has been extensively cleared. This impact is considered a significant residual impact that requires counterbalancing by an appropriate environmental offset. In making this determination, the Delegated Officer also considered the cumulative impacts contributing to the loss of native vegetation resulting from surrounding projects within the local area approved and proposed under Part IV of the EP Act.

Conclusion
Based on the above assessment, the proposed clearing will result in loss of 2.16 hectares of native vegetation that is a significant remnant within an extensively cleared landscape. This loss will be partially mitigated by the proposed onsite revegetation to improve the condition of 5.2 hectares of adjacent native vegetation. An offset to counterbalance the remaining significant impacts to significant remnant vegetation in an extensively cleared landscape has also been provided. The implementation of weed management measures will also be required to mitigate the risk of weeds spread.

Conditions
To address the above impacts, the following management measures will be required as conditions on the clearing permit:

- Avoidance and minimisation to reduce the impacts of the clearing,
- Weed and hygiene management measures, requiring the permit holder to take hygiene steps to minimise the risk of the introduction and spread of weeds to adjacent vegetation,
- Onsite revegetation to improve the condition of 5.2 hectares of native vegetation that is considered a significant remnant in extensively cleared landscape, according to the proposed revegetation management plan, and
- Offset-the conservation, in perpetuity, of 4.67 hectares of native vegetation that is representative of BVA 1024 in a Very Good or better (Keighery, 1994) condition and is considered a significant remnant vegetation in an extensively cleared landscape.

3.3. Relevant planning instruments and other matters

In accordance with section 51O(4) of the EP Act, in considering a clearing matter, the Delegated Officer shall have regard to any development approval, planning instrument, or other matter, that they consider relevant. The planning instruments and other matters considered relevant by the Delegated Officer in determining to grant Clearing Permit CPS 11204/1, are outlined below.

Necessity of clearing
DWER's '*A guide to the assessment of applications to clear native vegetation'* (DER, 2013) indicates that the necessity of the clearing is an 'other relevant matter' to be considered when making decisions as to whether a clearing permit should be granted. The assessment guideline prioritises clearing for public use over private benefit or commercial gain (DER, 2013).

The applicant has advised that (EndPlan, 2025):

- Since 2018, CBH has been working closely with the Western Australian Government on an agricultural supply chain freight strategy- the Revitalising Agricultural Region Freight (RARF) Strategy,
- In early 2020, the WA Government commissioned an independent expert to undertake a study on estimating the costs to reinstate Tier 3 rail lines within WA. This report, published in September 2020, was submitted by the WA Government to Infrastructure Australia (IA) for funding. Initially, three lines were funded (York to Quairading, Kulin to Narrogin and Kondinin to Merredin) but this was subsequently expanded to include sidings at Cranbrook, Broomehill, Brookton, and Moora, with the Government's funding initiative renamed the ASCI,
- The ASCI was entered on the IA's infrastructure priority initiative list in February 2021 and formally announced in May of that year. The Commonwealth and WA Governments have jointly funded ASCI Package 1, with $160 million and $40 million of funding, respectively. The projects that have been funded were determined through consultation with the State and Federal Governments, CBH, rail network manager Arc Infrastructure (ARC), grower groups and local government authorities. The $200 million package will go towards four priority project areas:
    - Rail siding extensions at CBH rail out-loading sites at Moora, Brookton, Cranbrook, and Broomehill, which are to complement CBH's investment in the rail loading facilities.
    - Seven additional grain rail siding upgrades planned for Meenaar, Kellerberrin, Dowerin, Konnongorring, Ballidu, Mingenew, and Perenjori North, which will enable CBH to load longer trains much more efficiently.
    - Upgrading the Midland narrow gauge line from 16 Tonne Axle Loading (TAL) to 19 TAL between Carnamah and Mingenew, allowing heavier trains and a 20 % increase in train loads.
    - Progressive recommissioning of the Narrogin-Kulin rail line and associated works to service grain and other potential customers in the Narrogin-Wickepin area via a Tier 3 line.
- Due to the economic advantages associated with using rail, CBH is planning to expand its rail infrastructure at key receival sites such as Ballidu. The program specifically addresses issues with loading of trains including excessive splitting and shunting of trains, low or poor out-loading performance, limited ability to

store a train load of product on demand and safety implications with trains blocking local roads and mainline tracks.

In considering the clearing permit application, the Delegated Officer had regard to the fact that the proposed clearing is necessary to facilitate the Ballidu Rail Project which will deliver community benefits for traffic safety by taking trucks off the road, improving safety and providing environmental benefits associated with less emission intensive rail movements (see Section 1.2 for details).

Consultation
The clearing permit was advertised on the DWER's website on 21 July 2025, inviting submissions from the public within a 21-day period. No submissions were received.

The Shire of Wongan Hills- Ballidu was invited to provide comment on the clearing permit application on 21 August 2025. No formal comments were received to date. However, the applicant has advised that the planning approval for the proposed works was granted by the Shire of Wongan- Ballidu on 8 December 2025 (CBH, 2026a).

In April 2023, the preferred option for the rail siding and out-loading facility was approved by key project stakeholders. The endorsed option includes two times approximately 1750 wheat tonne equivalent over rail bins and approximately 616 metres siding, which will accommodate loading of a 52 wagon train in approximately four hours at CBH Ballidu (EndPlan, 2025).

No Aboriginal sites of significance have been mapped within the application area. It is the permit holder's responsibility to comply with the *Aboriginal Heritage Act 1972* (WA) and ensure that no Aboriginal Sites of Significance are damaged through the clearing process.

4 Suitability of offsets

Through the detailed assessment outlined in Section 3.2 above, the Delegated Officer has determined that the following significant residual impacts remain after the application of the avoidance and mitigation measures summarised in Section 3.1:

- The loss of 2.16 hectares of native vegetation that is significant as a remnant in an extensively cleared landscape,
- The loss of 0.11 hectares of native vegetation that is critical habitat for Critically Endangered *G. dryandroides* subsp. *dryandroides*; and
- The loss of 1.79 hectares of native vegetation that is low to moderate foraging habitat for Carnaby's cockatoo.

In determining the appropriateness of the proposed offset, the Delegated Officer took into consideration the applicant's implementation of the mitigation hierarchy and the public benefit of the proposed clearing (see Section 3.1). The Delegated Officer noted that the proposed Ballidu Rail Project is expected to provide direct public benefit through increased traffic safety by taking trucks off the road.

The applicant has proposed an environmental offset to counterbalance the above impact, as detailed below. The Delegated Officer determined, in this instance, it was appropriate to consider an offset to counterbalance the significant residual impact given the extent of proposed impact, and the applicants efforts to avoid and minimise the environmental impacts of the proposed clearing, in accordance with the *Environmental Offsets Guidelines* (2014).

Proposed offset- Revegetation and rehabilitation
The applicant has proposed revegetation of a total of 5.2 hectares and is supported by a Restoration Plan that is consistent with DWER's guide to preparing Revegetation Plans for Clearing Permits. DWER considers the methods, species list and monitoring methodology are sufficient to ensure the offset can be achieved.

The applicant has proposed the following onsite revegetation and rehabilitation within a restoration area located in Lot 127 on Deposited Plan 428813, Ballidu:

- Revegetating 1.65 hectares of cleared and Completely Degraded condition vegetation to an improved level of Good and Very Good (Keighery, 1994) condition,
- Rehabilitating 3.66 hectares of Degraded to Good condition vegetation to an improved level of Good and Very Good (Keighery, 1994) condition.

It is considered for the restoration area within Lot 127 to consist of:

- 3.90 hectares of vegetation that provides suitable habitat for *G. dryandroides* subsp. *dryandroides,*
- 5.02 hectares of vegetation that provides moderate to low value foraging habitat for Carnaby's cockatoo; and

- 5.20 hectares of vegetation that is a significant remnant in an extensively cleared landscape and represents the BVA 1024.

Proposed Offset- Conservation covenant

The applicant has proposed 4.67 hectares of native vegetation in the restoration area, within Lot 27 on Deposited Plan 428813, Ballidu, to be conserved in perpetuity. Lot 27 is currently zoned Freehold. The majority of the area of rehabilitation and revegetation will be conserved in perpetuity through the application of a conservation covenant under section 30B of the *Soil and Land Conservation Act 1945.*

The applicant has proposed a range of management measures on site to maintain and improve the quality of the native vegetation within the offset area. These measures will include the improvement of quality of native vegetation to at least a Good or better (Keighery, 1994) condition through weed management, installing and upgrading fencing to limit access by public and establishing monitoring sites. Additional measures include weed control and hygiene protocols and fire management. It is considered that these measures are likely to improve the condition of the offset site to be Very Good to Excellent (Keighery, 1994) condition.

The Delegated Officer considers the proposed offset is consistent with the *WA Environmental Offsets Policy* (2011) and the *WA Environmental Offsets Guidelines* (2014), and that it adequately counterbalances the SRI's to native vegetation that is a significant remnant vegetation in an extensively cleared landscape, critical habitat for threatened flora, and low to moderate foraging habitat for Carnaby's cockatoo. The justification for the values used in the offset calculation is provided in Appendix F.

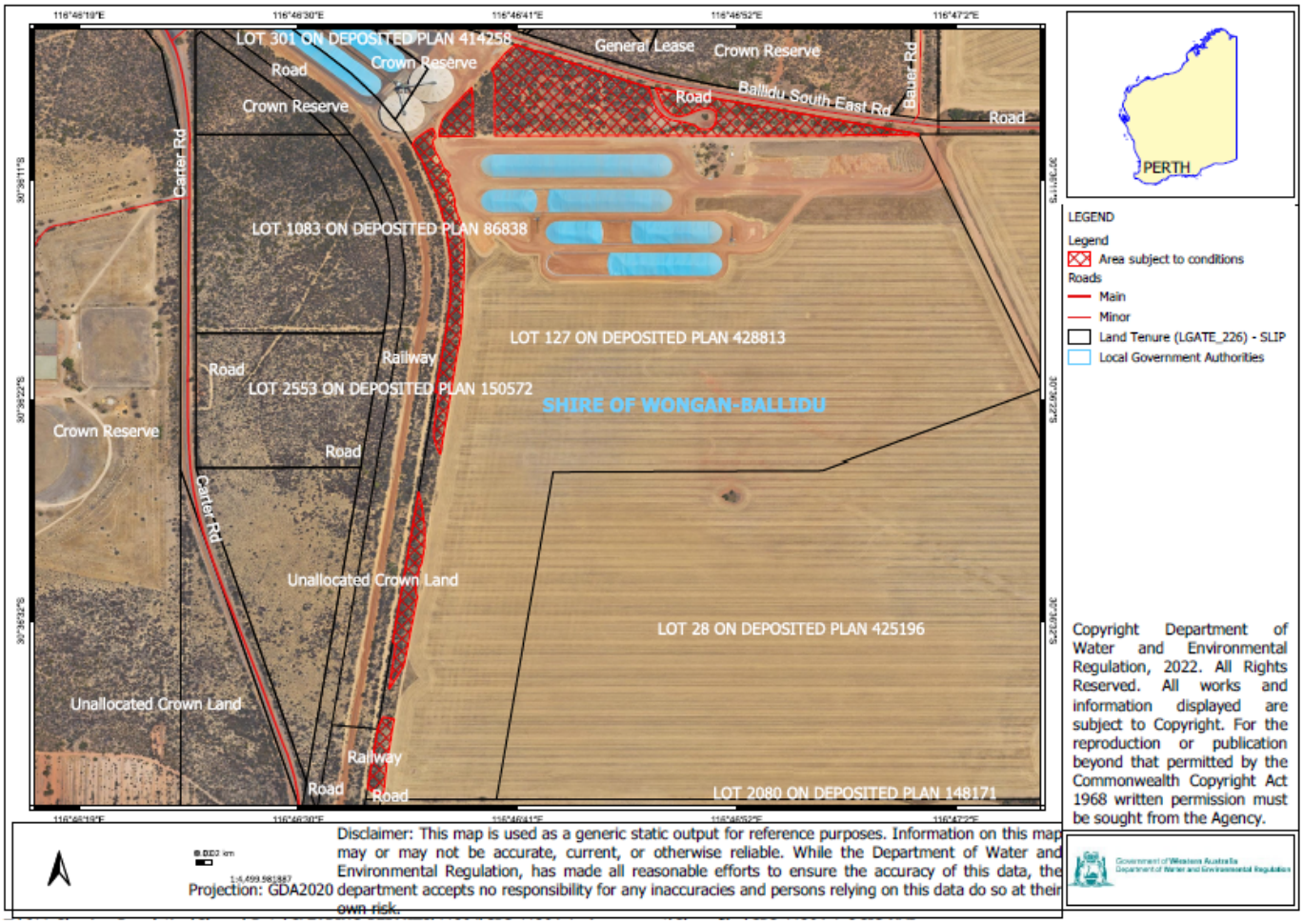


Figure 8. Map of the Restoration Area within Lot 27 on Deposited Plan 428813, Ballidu.

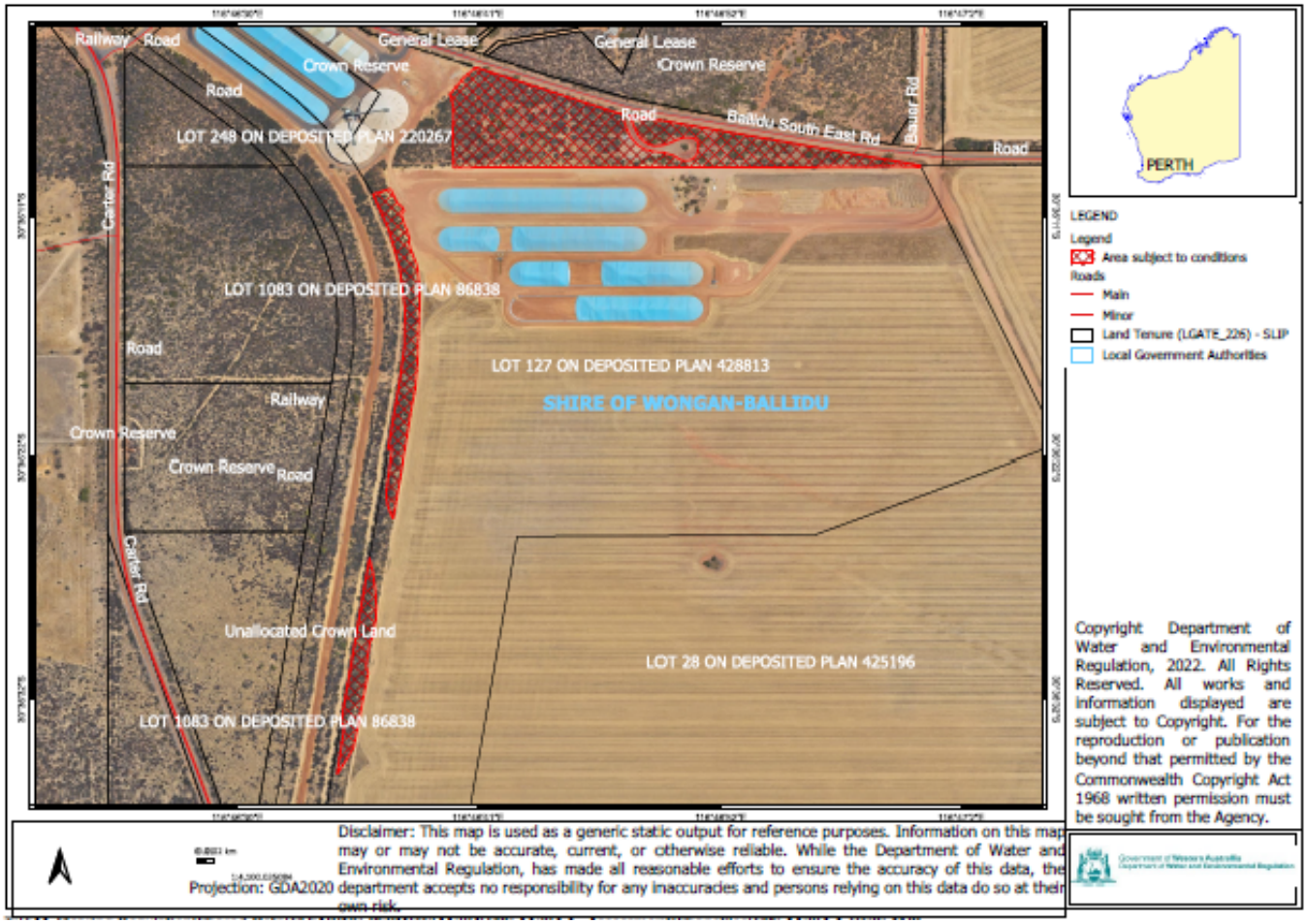


Figure 9. Map of the land acquisition offset area within Lot 27 on Deposited Plan 428813, Ballidu

End

Appendix A. Additional information provided by applicant

Summary of comments	Consideration of comment
Additional information provided by the applicant in response to a request for further information on the 24 December 2025. This information included the following: • Evidence of further efforts taken to avoid and mitigate significant environmental impacts resulting from the proposed clearing, including ○ Two revised application area options to reduce significant impacts of the proposed clearing on critical *G. dryandroides* subsp. *dryandroides* habitat, • A CEMP, including weed and dust measures within the 'No Go Zones', • Rehabilitation and revegetation commitments as part of the offset proposal, and • Evidence of planning approval from the Shire of Wongan-Ballidu	See Section 3.1.
Additional information provided by the applicant in response to a second request for further information on the 22 April 2026. This information included the following: • CBH's offset proposal, including the Restoration Plan, • Updates to the CEMP and WHMP including trapdoor spider management conditions.	See Section 3.2 and 4

Summary of comments	Consideration of comment
On the 25 May 2026 the applicant identified a satisfactory environmental offset to counterbalance significant impacts to native vegetation that is a significant remnant vegetation in an extensively cleared landscape, critical habitat for threatened flora, and low to moderate foraging habitat for Carnaby's cockatoo.	See Section 4.
On the 28 May 2026 the applicant provided an updated onsite Restoration Plan.	See Section 4.

Appendix B. Site characteristics

B.1. Site characteristics

The information provided below describes the key characteristics of the application area and is based on the best information available to DWER at the time of this assessment. This information was used to inform the assessment of the clearing against the Clearing Principles, contained in Appendix C.

Characteristic	Details
Local context	The application area consists of parts of expansive tracts of native vegetation in the intensive land use zone of Western Australia. It is surrounded by existing grain handling facilities, agricultural land and intact remnant vegetation. The proposed clearing area is part of remnant vegetation in a highly cleared landscape. The local area (10-kilometre radius from the centre of the application area) retains approximately 3.42 per cent of the original native vegetation cover.
Ecological linkage	The application area does not intersect any formally mapped ecological linkages. Although, given the extensively cleared local area, it is likely that the application area is contributing to linkage values in the area.
Conservation areas	The application area is not mapped within any conservation areas. The closest mapped conservation area is the Damboring Nature Reserve which is located approximately 10 kilometres north west of the application area.
Vegetation description	Six vegetation types were recorded within the application area during a vegetation survey (AECOM, 2023). The full descriptions and maps are available in Appendix F. • AcBs, Open heathland: *Allocasuarina campestris, Melaleuca orbicularis* and *Styphelia crassiflora* tall open heathland over *Borya sphaerocephala, Ecdeiocolea monostachya* and *Mesomelaena preissii* tall sedgeland. Supports Priority species *Acacia lirellata* subsp. *compressa* (P2) and *Verticordia venusta* (P3). Community occurs on yellow sandplain. • AcDr, Shrubland: *Allocasuarina campestris, Hakea meisneriana* and *Melaleuca conothamnoides* tall shrubland over *Dianella revoluta, Pimelea imbricata* var. *piligera* and *Ricinocarpos undulatus* low sparse forbland. Very dense overstorey over sparse understorey. Recorded on flats with gravelly brown soils • EpAcTp, Mid Mallee Woodland: *Eucalyptus phenax* subsp. *phenax* mallee woodland over *Allocasuarina campestris, Hibbertia exasperata* and *Chamelaucium brevifolia* tall to low open shrubland over *Trachymene pilosa, Dianella revoluta* and *Amphipogon caricinus* var *caricinus* low mixed grass and forbland. One occurrence recorded on flats with yellow brown clay. • EwMhAs, Open Mallee Woodland: *Eucalyptus wubinensis, Eucalyptus moderata* and *Acacia yorkrakinensis* subsp. *acrita* mid open woodland over *Melaleuca hamata, Acacia mackeyana* and *Acacia acuaria* tall to low open shrubland over *Austrostipa scabra, *Pentameris airoides* and *Waitzia acuminata* var. *acuminata* tall to low mixed sparse grass and forbland. *Recorded on* flats with sandy clay soils. Only recorded around carpark/partially cleared area north of CBH infrastructure. • McEm, Tall Shrubland: *Melaleuca cordata, Allocasuarina campestris* and *Melaleuca conothamnoides* tall shrubland over *Ecdeiocolea monostachya, Platysace trachymenioides* and *Amphipogon amphipogonoides* mixed tall

Characteristic	Details
	sedge, forb and low grassland. Includes isolated occurrences of *Santalum acuminatum* and *Eucalyptus rigidula.* Recorded on flats with yellow sand. • McGdWa, Tall Shrubland: *Melaleuca conothamnoides, Allocasuarina campestris* and *Grevillea paradoxa* tall shrubland over *Gahnia drummondii* low to tall open sedgeland over *Waitzia acuminata* var *acuminata, Trachymene pilosa* and *Platysace trachymenioides* low sparse forbland. Recorded on flat terrain with hard yellow orange clay loam soils. Includes isolated occurrences of *Eucalyptus wubinensis* This is consistent with the mapped vegetation type: • BVA 1024, which is described as shrublands; mallee and casuarina thicket (Shepherd et al, 2001) The mapped vegetation type retains approximately 11.74 per cent of the original extent (Government of Western Australia, 2019).
Vegetation condition	The supporting document (EndPlan, 2025) indicates that the vegetation within the proposed clearing area ranges from Degraded to Very Good (Keighery, 1994-) condition, including: • Very Good: 0.62 hectares (28.57 per cent of the application area) • Good: 1.52 hectares (70.05 per cent of the application area) • Degraded: 0.03 hectares (1.38 per cent of the application area) The full Keighery (1994) condition rating scale is provided in Appendix D. Representative photos and mapping are available in Appendix F.
Climate and landform	The region experiences a Mediterranean climate with cool winters and hot summers with a mean annual rainfall of 320-330 millilitres. The topography of the application area ranges from 300 - 310 metres Australian Height Datum (AHD).
Soil description	The soil within the application area is mapped as: • Ballidu 3 Subsystem (258Bd_3) which is described as undulating plain, crests and upper slopes from weathered granite. Mainly loamy gravel, yellow deep sand, sandy and loamy earth, Red shallow loamy duplex, minor of sandy loamy duplex
Land degradation risk	The soils within the application area are mapped as having a high risk of subsurface acidification and a moderate risk of wind erosion (DPIRD, 2025).
Waterbodies and hydrogeography	The desktop assessment and aerial imagery indicated that no waterbodies or wetlands intersect the application area. The closest water body to the application area is a non-perennial lake which is located approximately 2.5 kilometres north east. The application area is located within the Avon River System Surface Water area which is proclaimed under the RIWI Act. Groundwater salinity within the application area is mapped at 14000-35000 milligrams per total dissolved solids.
Flora	The desktop assessment identified that 21 conservation significant flora species have been recorded within the local area, comprising three threatened flora species and 18 priority flora species (Western Australian Herbarium, 1998-). None of these existing records occur within the application area, with the closest record being an occurrence of *Dampiera glabrescens* approximately 8.7 metres from the application area. With consideration of the site characteristics set out above, a targeted flora and vegetation survey (AECOM, 2023), relevant datasets (see Appendix G), and the habitat preferences of the species recorded from the local area, the application area is considered to provide habitat for conservation significant flora species and impacts to these flora species have been detailed under Section 3.2.2.

Characteristic	Details
Ecological communities	The desktop assessment identified that there are no conservation significant ecological communities within the application area. The closest mapped ecological community is the Eucalypt Woodlands of the Western Australian Wheatbelt which is listed as a Priority 3 Priority Ecological Community (PEC) by the Department of Biodiversity, Conservation and Attractions in Western Australia, which is located approximately nine kilometres north east of the application area. With consideration for the site characteristics, a flora and vegetation survey (AECOM, 2023) and relevant datasets (see Appendix G.1), the application area is not considered likely to contain vegetation representative of a Threatened Ecological Community (TEC) or PEC.
Fauna	The desktop assessment identified that two conservation significant fauna species have been recorded within the local area both being threatened fauna species. None of these existing records occur within the application area, with the closest being a historical record of *Egernia stokesii badia* approximately 0.94 kilometres from the application area. With consideration of the site characteristics set out above, a targeted fauna survey (Bamford, 2024), relevant datasets (see Appendix G), and the habitat preferences of the species recorded from the local area, the application area is considered to provide significant habitat for conservation significant fauna species and impacts to these fauna species have been detailed under Section 3.2.1.

B.2. Vegetation extent

	Pre-European extent (ha)	Current extent (ha)	Extent remaining (%)	Current extent in all DBCA managed land (ha)	Current proportion (%) of pre-European extent in all DBCA managed land
IBRA bioregion*					
Avon Wheatbelt	9517109.95	1761187.42	18.51	174980.68	1.84
Vegetation complex					
Beard vegetation association 1024*	742950.54	87192.44	11.74	8762.67	1.18
Vegetation complex in IBRA bioregion					
Beard vegetation association 1024*	738926.59	84606.91	11.45	6622.91	0.9
Local area					
10km radius	33258.48	1138.03	3.42	-	-

*Government of Western Australia (2019)

B.3. Flora analysis table

With consideration for the site characteristics set out above, relevant datasets (see Appendix H.1), and biological survey information, impacts to the following conservation significant flora required further consideration.

Species name	Conservation status	Suitable habitat features ? [Y/N]	Suitable vegetation type? [Y/N]	Suitable soil type? [Y/N]	Distance of closest record to application area (m)	Number of known records (total)	Are surveys adequate to identify? [Y, N, N/A]
Acacia lirellata subsp. *compressa*	P2	Y	Y	Y	2	10	Y
Acacia scalena	P3	Y	Y	Y	12.2	36	Y
Dampiera glabrescens	P1	Y	Y	Y	20	190	Y
Grevillea dryandroides subsp. *dryandroides*	CR	Y	Y	Y	12	1	Y
Grevillea rosieri	P2	Y	Y	Y	640	1	Y
Verticordia venusta	P3	Y	Y	Y	37	2	Y

T: threatened, CR: critically endangered, EN: endangered, VU: vulnerable, P: priority

B.4. Fauna analysis table

Species name	Conservation status	Suitable habitat features? [Y/N]	Suitable vegetation type? [Y/N]	Distance of closest record to application area (m)	Number of known records (total)	Are surveys adequate to identify? [Y, N, N/A]
Idiosoma nigrum (shield-backed trapdoor spider)	EN	Y	Y	41	3	Y
Idiosoma castellum (tree-stem trapdoor spider)	P4	Y	Y	31	1	Y
Zanda latirostris (Carnaby's cockatoo)	EN	Y	Y	17.3km	0	Y

T: threatened, CR: critically endangered, EN: endangered, VU: vulnerable, P: priority

Appendix C. Assessment against the clearing principles

Assessment against the clearing principles	Variance level	Is further consideration required?
Environmental value: biological values		
Principle (a): *"Native vegetation should not be cleared if it comprises a high level of biodiversity."* Assessment: The application area contains significant habitat for conservation significant flora and fauna. The application area consists of Good to Very Good (Keighery, 1994) condition vegetation representative of the highly cleared BVA 1024, contains suitable habitat for priority flora, contains critical habitat for threatened flora and provides habitat for conservation significant fauna species. It is therefore considered for the application area to represent an area of high biodiversity compared to the surrounding cleared landscape.	At variance	Yes *Refer to Section 3.2.1, above.*
Principle (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."* Assessment: The application area contains significant foraging habitat for Carnaby's cockatoo and habitat for conservation significant trapdoor spider species. It is also considered for the application area to be a part of an informal ecological corridor to facilitate movement of local fauna through an extensively cleared landscape.	At variance	Yes *Refer to Section 3.2.1, above.*
Principle (c): *"Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, threatened flora."*	At variance	Yes

Assessment against the clearing principles	Variance level	Is further consideration required?
Assessment: The application area contains critical habitat for *G. dryandroides* subsp. *dryandroides* listed as Critically Endangered under the BC Act.		*Refer to Section 3.2.2, above.*
Principle (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."* Assessment: The application area is unlikely to be representative of any TEC listed under the BC Act or EPBC Act (AECOM, 2023).	Not at variance	No
Environmental value: significant remnant vegetation and conservation areas		
Principle (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."* Assessment: The extent of native vegetation in the local area is inconsistent with the national objectives and targets for biodiversity conservation in Australia. The vegetation proposed to be cleared is considered to be part of a significant ecological linkage in the local area. Given that the proposed clearing will result in the loss of significant native vegetation within an area that retains 3.42 per cent of pre-European vegetation extent remaining in the local area, it is considered that the proposed clearing is 'seriously at variance' with this principle.	Seriously at variance	Yes *Refer to Section 3.2.3, above.*
Principle (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."* Assessment: Given the distance to the nearest conservation area, the proposed clearing is not likely to have an impact on the environmental values of nearby conservation areas.	Not likely to be at variance	No
Environmental value: land and water resources		
Principle (f): *"Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland."* Assessment: Given no water courses or wetlands are recorded within the application area, the proposed clearing is unlikely to impact on- or off-site hydrology and water quality.	Not likely to be at variance	No
Principle (g): *"Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation."* Assessment: The mapped soils are highly susceptible to subsurface acidification. Noting the final land use is for infrastructure construction which will not leave the bare earth exposed to weather, the potential impacts are considered short-term and the proposed clearing is unlikely to cause appreciable land degradation.	Not likely to be at variance	No
Principle (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."* Assessment: Given no water courses or wetlands are recorded within the application area, the proposed clearing is unlikely to impact surface or ground water quality.	Not likely to be at variance	No
Principle (j): *"Native vegetation should not be cleared if the clearing of the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding."*	Not at variance	No

Assessment against the clearing principles	Variance level	Is further consideration required?
Assessment: The mapped soils and topographic contours in the surrounding area do not indicate the proposed clearing is unlikely to contribute to increased incidence or intensity of flooding. Given no water courses or wetlands are recorded within the application area, the proposed clearing is unlikely to contribute to waterlogging.		

Appendix D. Vegetation condition rating scale

Vegetation condition is a rating given to a defined area of vegetation to categorise and rank disturbance related to human activities. The rating refers to the degree of change in the vegetation structure, density and species present in relation to undisturbed vegetation of the same type. The degree of disturbance impacts upon the vegetation's ability to regenerate. Disturbance at a site can be a cumulative effect from a number of interacting disturbance types.

Considering its location, the scale below was used to measure the condition of the vegetation proposed to be cleared. This scale has been extracted from 'Keighery, B.J. (1994) *Bushland Plant Survey: A Guide to Plant Community Survey for the Community*. Wildflower Society of WA (Inc). Nedlands, Western Australia'.

Measuring vegetation condition for the South West and Interzone Botanical Province (Keighery, 1994)

Condition	Description
Pristine	Pristine or nearly so, no obvious signs of disturbance.
Excellent	Vegetation structure intact, with disturbance affecting individual species; weeds are non-aggressive species.
Very good	Vegetation structure altered, with obvious signs of disturbance. For example, disturbance to vegetation structure caused by repeated fires, the presence of some more aggressive weeds, dieback, logging and/or grazing.
Good	Vegetation structure significantly altered by very obvious signs of multiple disturbances. Retains basic vegetation structure or ability to regenerate it. For example, disturbance to vegetation structure caused by very frequent fires, the presence of some very aggressive weeds at high density, partial clearing, dieback and/or grazing.
Degraded	Basic vegetation structure severely impacted by disturbance. Scope for regeneration but not to a state approaching good condition without intensive management. For example, disturbance to vegetation structure caused by very frequent fires, the presence of very aggressive weeds, partial clearing, dieback and/or grazing.
Completely degraded	The structure of the vegetation is no longer intact and the area is completely or almost completely without native species. These areas are often described as 'parkland cleared' with the flora comprising weed or crop species with isolated native trees or shrubs.

Appendix E. Offset calculator value justification

E.1. Significant remnant vegetation

WA Environmental Offsets Calculator
Rationale for scores used in the offset calculator

Calculation	Score (Area)	Rationale
Conservation significance		
Description	Significant remnant vegetation within an area that has been extensively cleared located within the Avon Wheatbelt	The proposed clearing will impact on 2.16 hectares of native vegetation that is significant as a remnant within an area that has been extensively cleared located within the Avon Wheatbelt.

Calculation	Score (Area)	Rationale
Type of environmental value	Vegetation/habitat	Significant remnant vegetation within the Avon Wheatbelt IBRA bioregion.
Conservation significance of environmental value	Terrestrial native vegetation complex - <30% extent remaining in the bioregion	The vegetation within the application area occurs within a local area (10- kilometre radius) that retains approximately 3.42 per cent of its original vegetation extent. The application area contains extensively cleared BVA 1024 which retains 11.74 per cent of its original vegetation extent in the Avon Wheatbelt IBRA bioregion.
Landscape-level value impacted	yes/no	The impact is to an area of in hectares.
Significant impact		
Description	Significant remnant vegetation in Good to Very Good (Keigher, 1994) condition in an area that has been extensively cleared located within the Avon Wheatbelt	Native vegetation that is significant as a remnant within an area that has been extensively cleared is proposed to be cleared for the purpose of works associated with the Ballidu rail upgrades. The application area is located within the Avon Wheatbelt region (18.51 per cent vegetation remaining); The BVA 1024 in the application area retains 11.74 per cent and the local area (10 kilometre radius of the application area) has 3.42 per cent vegetation remaining.
Significant impact (hectares) / Type of feature	2.16	Approximately 2.16 hectares of extensively cleared BVA 1024 located within the Avon Wheatbelt. Given the local area retains 3.42 per cent of its original vegetation extent, the entire application area is considered to be significantly contributing to the ecological function of native vegetation in the local area. Based on information available from the Ballidu Flora and Vegetation Assessment (AECOM, 2023), the proposed clearing area consists of open heathland, shrubland, mid mallee woodland, open mallee woodland and tall shrubland
Quality (scale) / Number	7.00	Based on the available information from the Ballidu Flora and Vegetation Assessment (AECOM, 2023); the vegetation within the application is in Very Good (0.63 hectares), Good (1.5 hectares) and Degraded (0.03 hectares) (Keighery, 1994) condition.
Rehabilitation credit		
Description	Weed management and onsite measures to improve significant remnant vegetation in Good to Very Good (Keighery, 1994) condition	On site management and annual weed control and monitoring with restriction of access for a minimum of 10 years.
Proposed rehabilitation (area in hectares)	0.53	0.53 hectares consisting of significant remnant of native vegetation in a highly cleared area adjacent to area proposed to be cleared. The vegetation has been mapped occurring in a Good to Very Good (Keighery, 1994) condition and consisting of VSA's; McGdWa (Complex Shrublands) and AcDr (Woodland) (AECOM 2023)
Current quality of rehabilitation site / Start number (of type of feature)	6.00	The vegetation has been mapped occurring in a Good to Very Good (Keighery, 1994) condition and consisting of VSA's; McGdWa (Complex Shrublands) and AcDr (Woodland) (AECOM, 2023)

Calculation	Score (Area)	Rationale
Future quality WITHOUT rehabilitation (scale) / Future number WITHOUT rehabilitation	6.00	Vegetation has been mapped occurring in Good to Very Good (Keighery, 1994) and is not expected to change.
Future quality WITH rehabilitation (scale) / Future number WITH rehabilitation	8.00	Revegetation will be undertaken in accordance with a prepared Restoration Management Plan (CBH, 2026c). The offset area will achieve a Very Good to Excellent (Keighery, 1994) condition.
Time until ecological benefit (years)	12.00	It is assumed the benefits of revegetation will be available after 10 years, an extra two years have been allowed to account for the delay in commencement of the revegetation (assumed to commence within 2 years of permit start date).
Confidence in rehabilitation result (%)	0.8	There is a moderate to high level of confidence that the offset will achieve the predicted result given revegetation and rehabilitation will be undertaken in accordance with a Project Revegetation Plan prepared following DWER's *Guide to preparing revegetation plans for clearing permits* (2018).
Offset		
Description	Revegetation of native vegetation that is within a significant remnant and in a highly cleared landscape occurring in good condition	Weed management and infill seeding and planting to improve significant remnant vegetation to a Good and Very Good (Keighery, 1994) condition in accordance with the Project Restoration Plan (CBH, 2026c).
Proposed offset (area in hectares)	3.02	The revegetation of 3.02 hectares of native vegetation that is in Degraded to Good (Keighery, 1994) condition within the offset site. (AECOM, 2023)
	1.65	The revegetation of 1.65 hectares of native vegetation that is cleared or in Completely Degraded (Keighery, 1994) condition within the offset site
Current quality of offset site / Start number (of type of feature)	6.00	The current condition of remnant vegetation has been mapped as Good to Very Good (Keighery, 1994) condition within the offset site (AECOM, 2023)
	1.00	The current condition of the revegetation area is cleared and in Degraded (Keighery, 1994) condition (AECOM, 2023).
Future quality WITHOUT offset (scale) / Future number WITHOUT offset	6.00	Vegetation has been mapped occurring in Good to Very Good (Keighery, 1994) and is not expected to change without management actions .
	1.00	The current condition of the revegetation area is cleared and in Degraded (Keighery, 1994) condition and is unlikely to change without management
Future quality WITH offset (scale) / Future number WITH offset	8.00	Revegetation will be undertaken in accordance with a prepared Restoration Management Plan (CBH, 2026c) . The offset area will achieve a Very Good to Excellent (Keighery, 1994) condition.
	6.00	Revegetation will be undertaken in accordance with a prepared Restoration Management Plan (CBH, 2026c) . The offset area will achieve a Good to Very Good (Keighery, 1994) condition.

Calculation	Score (Area)	Rationale
Time until ecological benefit (years)	12.00	It is assumed the benefits of revegetation will be available after 10 years, an extra two years have been allowed to account for the delay in commencement of the revegetation (assumed to commence within 2 years of permit start date).
Confidence in offset result (%)	0.8	There is a moderate to high level of confidence that the offset will achieve the predicted result given revegetation and rehabilitation will be undertaken in accordance with a Project Revegetation Plan prepared following DWER's *Guide to preparing revegetation plans for clearing permits* (2018).
Duration of offset implementation (maximum 20 years)	20.00	The offset site will be transferred into conservation estate and will be managed in perpetuity. Therefore, the maximum of 20 years is applied.
Time until offset site secured (years)	2.00	It is assumed that the revegetation offset site will be placed under a conservation covenant within 2 years of clearing
Risk of future loss WITHOUT offset (%)	15.0%	Offset site is currently zoned rural and is freehold land which is located adjacent to existing CBH operations.
Risk of future loss WITH offset (%)	5.0%	The future conservation (in perpetuity) of the offset site would result in increased security and substantially reduce the risk of loss.
Offset ratio (Conservation area only)	N/A	100%
Landscape level values of offset?	N/A	Yes

E.2. Significant habitat for *G. dryandroides* subsp. *dryandroides*

WA Environmental Offsets Calculator
Rationale for scores used in the offset calculator

Calculation	Score (Area)	Rationale
Conservation significance		
Description	Significant habitat for *Grevillea dryandroides* subsp. *dryandroides*, within 50 metre buffer of individual	The proposed clearing will impact on 0.11 hectares of significant habitat for *G. dryandroides* subsp. *dryandroides*
Type of environmental value	Species (flora/fauna)	*G. dryandroides* subsp. *dryandroides* is listed as a Threatened flora species under the Commonwealth EPBC Act and state BC Act.
Conservation significance of environmental value	Rare/threatened species- critically endangered	*G. dryandroides* subsp. *dryandroides* is listed as Critically Endangered under the BC Act
Landscape-level value impacted	yes/no	The impact is to an area of in hectares.
Significant impact		
Description	Clearing of native vegetation that comprises significant habitat for *Grevillea dryandroides* subsp. *dryandroides*	Native vegetation that comprises critical habitat for *G. dryandroides* subsp. *dryandroides* is proposed to be cleared for the purpose of works associated with the Ballidu rail upgrades.
Significant impact (hectares) / Type of feature	0.11	0.11 hectares of critical habitat within the 50 metre buffer of one recorded individual. This vegetation consists of shrubland habitat in Good to Very Good (Keighery, 1994) condition (AECOM, 2023)

Calculation	Score (Area)	Rationale
Quality (scale) / Number	6.00	Suitable significant habitat for *G. dryandroides* subsp. *dryandroides* occurs in Good to Very Good (Keighery, 1994) condition, AECOM (2023)
Rehabilitation credit		
Description	Revegetation and rehabilitation of native vegetation onsite that provides critical habitat for *Grevillea dryandroides* subsp. *dryandroides*	On site management and annual weed control and monitoring with restriction of access for a minimum of 10 years.
Proposed rehabilitation (area in hectares)	0.43	Total area being revegetated is 0.43 hectares but 0.10 hectares is not suitable habitat for this rare flora species (consisting of woodland).
Current quality of rehabilitation site / Start number (of type of feature)	6.00	According to the Ballidu Flora and Vegetation Assessment AECOM (2023) the revegetation area occurs in Good to Very Good (Keighery, 1994) condition with some grassy weeds observed.
Future quality WITHOUT rehabilitation (scale) / Future number WITHOUT rehabilitation	6.00	Condition of habitat is not expected to change over time.
Future quality WITH rehabilitation (scale) / Future number WITH rehabilitation	8.00	Revegetation will be undertaken in accordance with the Restoration Management Plan (CBH, 2026c). The offset area will achieve a Very Good to Excellent (Keighery, 1994) condition
Time until ecological benefit (years)	12.00	It is assumed the benefits of revegetation will be available after 10 years, an extra two years have been allowed to account for the delay in commencement of the revegetation (assumed to commence within 2 years of permit start date).
Confidence in rehabilitation result (%)	0.8	There is a moderate to high level of confidence that the offset will achieve the predicted result given revegetation and rehabilitation will be undertaken in accordance with a Project Revegetation Plan prepared following DWER's *Guide to preparing revegetation plans for clearing permits* (2018).
Offset		
Description	Revegetation and rehabilitation of native vegetation that provides habitat for *Grevillea dryandroides* subsp. *dryandroides*	Spreading of topsoil, infill planting and weed management of approximately 4.67 hectares of remnant native vegetation in accordance with Restoration Plan (CBH, 2026c). This remnant of native vegetation contains approximately 2.59 hectares of suitable habitat for the *G. dryandroides* subsp. *dryandroides* in a Completely Degraded to Good (Keighery, 1994) condition.
Proposed offset (area in hectares)	3.07	3.07 hectares of suitable habitat available (shrubland habitat)
Current quality of offset site / Start number (of type of feature)	4.00	The current condition of native vegetation has been mapped as 1.76 ha in Good (Keighery, 1994) condition, with 1.31 ha in a cleared/completely degraded condition within the offset site (AECOM, 2023). Approximately 0.30 ha occurs within the 50 m buffer of one individual of this species.
Future quality WITHOUT offset (scale) / Future	4.00	Condition of native vegetation is not expected to change over time without management.

Calculation	Score (Area)	Rationale
number WITHOUT offset		
Future quality WITH offset (scale) / Future number WITH offset	7.00	The applicant has committed to preparing a Project Revegetation Plan in accordance with DWER's *Guide to preparing revegetation plans for clearing permits* (2018), including measurable completion criteria. Revegetation will achieve a Good to Very Good (Keighery, 1994) condition across the site and to provide suitable habitat for the *G. dryandroides* subsp. *dryandroides.*
Time until ecological benefit (years)	12.00	It is assumed the benefits of revegetation will be available after 10 years, an extra two years have been allowed to account for the delay in commencement of the revegetation (assumed to commence within 2 years of permit start date).
Confidence in offset result (%)	0.8	There is a moderate to high level of confidence that the offset will achieve the predicted result given revegetation and rehabilitation will be undertaken in accordance with a Project Revegetation Plan prepared following DWER's *Guide to preparing revegetation plans for clearing permits* (2018).
Duration of offset implementation (maximum 20 years)	20.00	The offset site will be transferred into conservation estate and will be managed in perpetuity. Therefore, the maximum of 20 years is applied.
Time until offset site secured (years)	2.00	It is assumed that the revegetation offset site will be placed under a conservation covenant within 2 years of clearing
Risk of future loss WITHOUT offset (%)	15.0%	The offset site is currently zoned rural and is freehold land adjacent to existing CBH operations.
Risk of future loss WITH offset (%)	5.0%	The future conservation (in perpetuity) of the offset site would result in increased security and substantially reduce the risk of loss.
Offset ratio (Conservation area only)	N/A	>100%
Landscape level values of offset?	N/A	Yes

E.3. Carnaby's cockatoo foraging habitat

WA Environmental Offsets Calculator
Rationale for scores used in the offset calculator

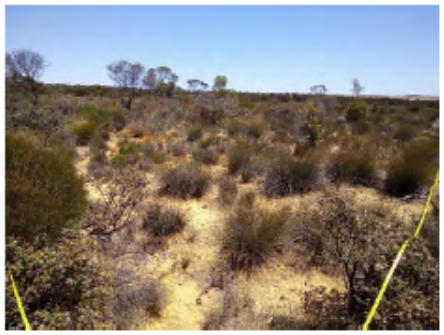
Calculation	Score (Area)	Rationale
Conservation significance		
Description	Carnaby's cockatoo foraging habitat	The proposed clearing will impact on 1.79 hectares of significant foraging habitat for Carnaby's cockatoo.
Type of environmental value	Species (flora/fauna)	Carnaby's cockatoo is listed as a Threatened fauna species under the Commonwealth EPBC Act and state BC Act.
Conservation significance of environmental value	Rare/threatened Species - endangered	Carnaby's cockatoo is listed as Endangered under both the EPBC Act and BC Act.
Landscape-level value impacted	yes/no	The impact is to an area of foraging habitat in hectares.
Significant impact		

Calculation	Score (Area)	Rationale
Description	Clearing of native vegetation that comprises low to moderate value foraging habitat for Carnaby's cockatoo.	The application area contains native vegetation that comprises low to moderate quality foraging habitat for Carnaby's cockatoo is proposed to be cleared for the Ballidu rail construction.
Significant impact (hectares) / Type of feature	1.79	The proposed clearing will impact on 1.79 hectares of low to moderate foraging habitat for Carnaby's cockatoo given low density of suitable foraging species within the application area.
Quality (scale) / Number	3.00	Suitable foraging habitat for Carnaby's cockatoo occurs in Good (Keighery, 1994) condition according to AECOM (2023). However, the native vegetation persists at low densities and consists of low to moderate foraging value plant species.
Rehabilitation credit		
Description	Revegetation and rehabilitation of native vegetation onsite that provides foraging habitat for Carnaby's cockatoo	On site management and annual weed control and monitoring with restriction of access for a minimum of 10 years.
Proposed rehabilitation (area in hectares)	0.53	The Restoration Area (CBH, 2026c) of suitable foraging habitat occurs adjacent to the application area.
Current quality of rehabilitation site / Start number (of type of feature)	3.00	According to the Ballidu Flora and Vegetation Assessment AECOM (2023), the rehabilitation area occurs in Good (Keighery, 1994) condition with grassy weeds observed. Suitable foraging habitat for this species occurs in Good (Keighery, 1994) condition according to the Ballidu Flora and Vegetation Assessment AECOM (2023). However, the native vegetation persists at low densities and consists of low to moderate foraging value plant species.
Future quality WITHOUT rehabilitation (scale) / Future number WITHOUT rehabilitation	3.00	The condition of habitat is not expected to change over time without management.
Future quality WITH rehabilitation (scale) / Future number WITH rehabilitation	4.00	With annual weed management and monitoring, the condition of the foraging habitat is expected to reach an improved Good (Keighery, 1994) condition. However, the recruitment of foraging species is considered to only increase moderately given current vegetation type (VSA; McGdWa- Complex Shrubland with 10 to 15 per cent suitable foraging species)
Time until ecological benefit (years)	12.00	It is assumed the benefits of revegetation will be available after 10 years, an extra two years have been allowed to account for the delay in commencement of the revegetation (assumed to commence within 2 years of permit start date).
Confidence in rehabilitation result (%)	0.8	There is a moderate to high level of confidence that the offset will achieve the predicted result given revegetation and rehabilitation will be undertaken in accordance with a Restoration Management Plan (CBH, 2026c) prepared following DWER's *Guide to preparing revegetation plans for clearing permits* (2018).
Offset		

Calculation	Score (Area)	Rationale
Description	Revegetation and rehabilitation of native vegetation that comprises low to moderate foraging habitat for Carnaby's cockatoo	Spreading of topsoil, infill planting and weed management in accordance with the Restoration Management Plan (CBH, 2026c).
Proposed offset (area in hectares)	2.84	The revegetation of 2.84 hectares of Degraded to Good (Keighery, 1994) condition native vegetation that comprises foraging habitat for Carnaby's cockatoo.
	1.65	The revegetation of 1.65 hectares of cleared to Completely Degraded (Keighery, 1994) condition native vegetation that comprises foraging habitat for Carnaby's cockatoo.
Current quality of offset site / Start number (of type of feature)	3.00	Majority of the offset area in Good (Keighery, 1994) condition with low to moderate quality foraging habitat. Suitable habitat for this species occurs in Good (Keighery, 1994) condition according to the Ballidu Flora and Vegetation Assessment AECOM (2023). However, the native vegetation persists at low densities and consists of low to moderate foraging value plant species.
	1.00	Majority of the offset area is in Degraded to Completely Degraded (Keighery, 1994) condition with limited foraging habitat according to the Ballidu Flora and Vegetation Assessment AECOM (2023).
Future quality WITHOUT offset (scale) / Future number WITHOUT offset	3.00	Condition of native vegetation is not expected to change over time without management.
	1.00	
Future quality WITH offset (scale) / Future number WITH offset	4.00	The applicant has committed to preparing a Project Revegetation Plan in accordance with DWER's *Guide to preparing revegetation plans for clearing permits* (2018), including measurable completion criteria. The revegetation area is to achieve Good (Keighery, 1994) condition and provide low to moderate foraging habitat for Carnaby's cockatoo - to accomplish the Complex Shrubland (AECOM, 2023) vegetation type in Good (Keighery, 1994) condition. The future quality with offset also considers the contextual factors of the revegetation offset areas (i.e., proximity to roost sites, occurring within an extensively modified part of the species' range, etc.).
Time until ecological benefit (years)	12.00	It is assumed the benefits of revegetation will be available after 10 years, an extra two years have been allowed to account for the delay in commencement of the revegetation (assumed to commence within 2 years of permit start date).
Confidence in offset result (%)	0.8	There is a moderate to high level of confidence that the offset will achieve the predicted result given revegetation and rehabilitation will be undertaken in accordance with a prepared Restoration Management Plan (CBH, 2026c) following

Calculation	Score (Area)	Rationale
		DWER's *Guide to preparing revegetation plans for clearing permits* (2018).
Duration of offset implementation (maximum 20 years)	20.00	The offset site will be transferred into conservation estate and will be managed in perpetuity. Therefore, the maximum of 20 years is applied.
Time until offset site secured (years)	2.00	It is assumed that the revegetation offset site will be placed under a conservation covenant within 2 years of clearing.
Risk of future loss WITHOUT offset (%)	15.0%	The offset site is currently zoned rural and is freehold land adjacent to existing CBH operations
Risk of future loss WITH offset (%)	5.0%	The future conservation (in perpetuity) of the offset site would result in increased security and substantially reduce the risk of loss.
Offset ratio (Conservation area only)	N/A	100%
Landscape level values of offset?	N/A	Yes

Appendix F. Biological survey information excerpts (AECOM, 2023; Bamford, 2024)

AcBs Open Heathland *Allocasuarina campestris, Melaleuca orbicularis* and *Styphelia crassiflora* tall open heathland over *Borya sphaerocephala, Eodeiocolea monostachya* and *Mesomelaena preissii* tall sedgeland. Supports Priority species *Acacia lirellata* subsp. *compressa* (P2) and *Verticordia venusta* (P3). Community occurs on yellow sandplain.	**Survey effort:** Quadrats 5, 6 and 7 **Area:** 2.54 ha **Veg Condition:** Very Good **Species Richness:** 48 native and 1 weed species	
AcDr Shrubland *Allocasuarina campestris, Hakea meisneriana* and *Melaleuca conothamnoides* tall shrubland over *Dianella revoluta, Pimelea imbricata* var. *piligera* and *Ricinocarpos undulatus* low sparse forbland. Very dense overstorey over sparse understorey. Recorded on flats with gravelly brown soils.	**Survey effort:** Quadrat 12 **Area:** 0.98 ha **Veg Condition:** Good **Species Richness:** 28 native and 1 weed species	

EpAcTp Mid Mallee Woodland *Eucalyptus phenax* subsp. *phenax* mallee woodland over *Allocasuarina campestris, Hibbertia exasperata* and *Chamelaucium brevifolia* tall to low open shrubland over *Trachymene pilosa, Dianella revoluta* and *Amphipogon caricinus* var *caricinus* low mixed grass and forbland. One occurrence recorded on flats with yellow brown clay.	**Survey effort:** Quadrat 2 **Area:** 0.72 ha **Veg Condition:** Very Good **Species Richness:** 24 native and 2 weed species	
EwMhAs Open Mallee Woodland *Eucalyptus wubinensis, Eucalyptus moderata* and *Acacia yorkrakinensis* subsp. *acrita* mid open woodland over *Melaleuca hamata, Acacia mackeyana* and *Acacia acuaria* tall to low open shrubland over *Austrostipa scabra, *Pentameris airoides* and *Waitzia acuminata* var. *acuminata* tall to low mixed sparse grass and forbland. *Recorded on* flats with sandy clay soils. Only recorded around carpark/partially cleared area north of CBH infrastructure.	**Survey effort:** Relevé 11 **Area:** 1.27 ha **Veg Condition:** Good **Species Richness:** 20 native and 1 weed species	
McEm Tall Shrubland *Melaleuca cordata, Allocasuarina campestris* and *Melaleuca conothamnoides* tall shrubland over *Ecdeiocolea monostachya, Platysace trachymenioides* and *Amphipogon amphipogonoides* mixed tall sedge, forb and low grassland. Includes isolated occurrences of *Santalum acuminatum* and *Eucalyptus rigidula*. Recorded on flats with yellow sand.	**Survey effort:** Quadrats 8 and 9 **Area:** 3.33 ha **Veg Condition:** Very Good to Excellent **Species Richness:** 21 native species	
McGdWa Tall Shrubland *Melaleuca conothamnoides, Allocasuarina campestris* and *Grevillea paradoxa* tall shrubland over *Gahnia drummondii* low to tall open sedgeland over *Waitzia acuminata* var *acuminata, Trachymene pilosa* and *Platysace trachymenioides* low sparse forbland. Recorded on flat terrain with hard yellow orange clay loam soils. Includes isolated occurrences of *Eucalyptus wubinensis*.	**Survey effort:** Quadrats 1, 3, 4, 10 and relevé 13 **Area:** 21.26 ha **Veg Condition:** Good to Very Good **Species Richness:** 48 native species	

Figure 10. Vegetation community descriptions and photographs (AECOM, 2023)

VSA 1. Cleared paddocks. Weedy grasses and oats, with a ground cover of shrubs and herbs over red loam. This VSA covers approximately 55% of the survey area. See Plate 1.	

VSA 2. Complex shrubland. Low vegetation of sedges, small shrubs of *Hakea, Melaleuca, Conospermum* (smoke bush), *Calothamnus* with emergent Sheoak and *Grevillea* on shallow sandy clay soils. This VSA covers approximately 16% of the survey area. See Plate 2.	
VSA 3. Eucalypt open woodland. *Eucalyptus salmonophloia* (Salmon gum) and Gimlet over salt bush, occasional *Acacia* and weedy grasses on red loam. This VSA covers approximately 1% of the survey area. See Plate 3.	
VSA 4. Planted trees. Planted species in open areas of township, *Eucalyptus camaldulensis* and *Eucalyptus sp* (unidentified) over grassy weeds and red loam sand. This VSA covers approximately 5% of the survey area. See Plate 4.	

Figure 11. Fauna Habitat VSA's (Bamford, 2024)

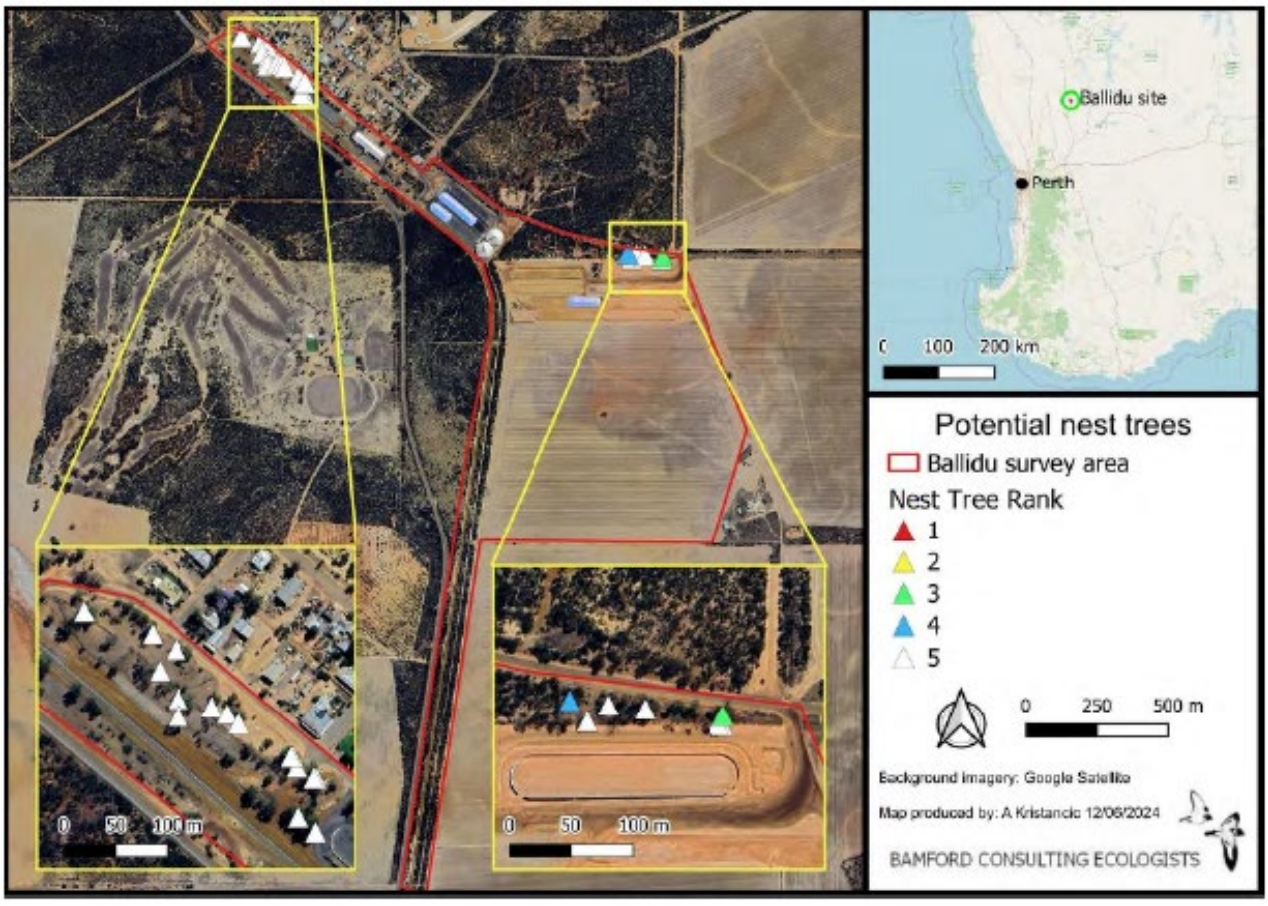


Figure 12. Locations of potential nest trees assessed during the site visit (Bamford, 2024)

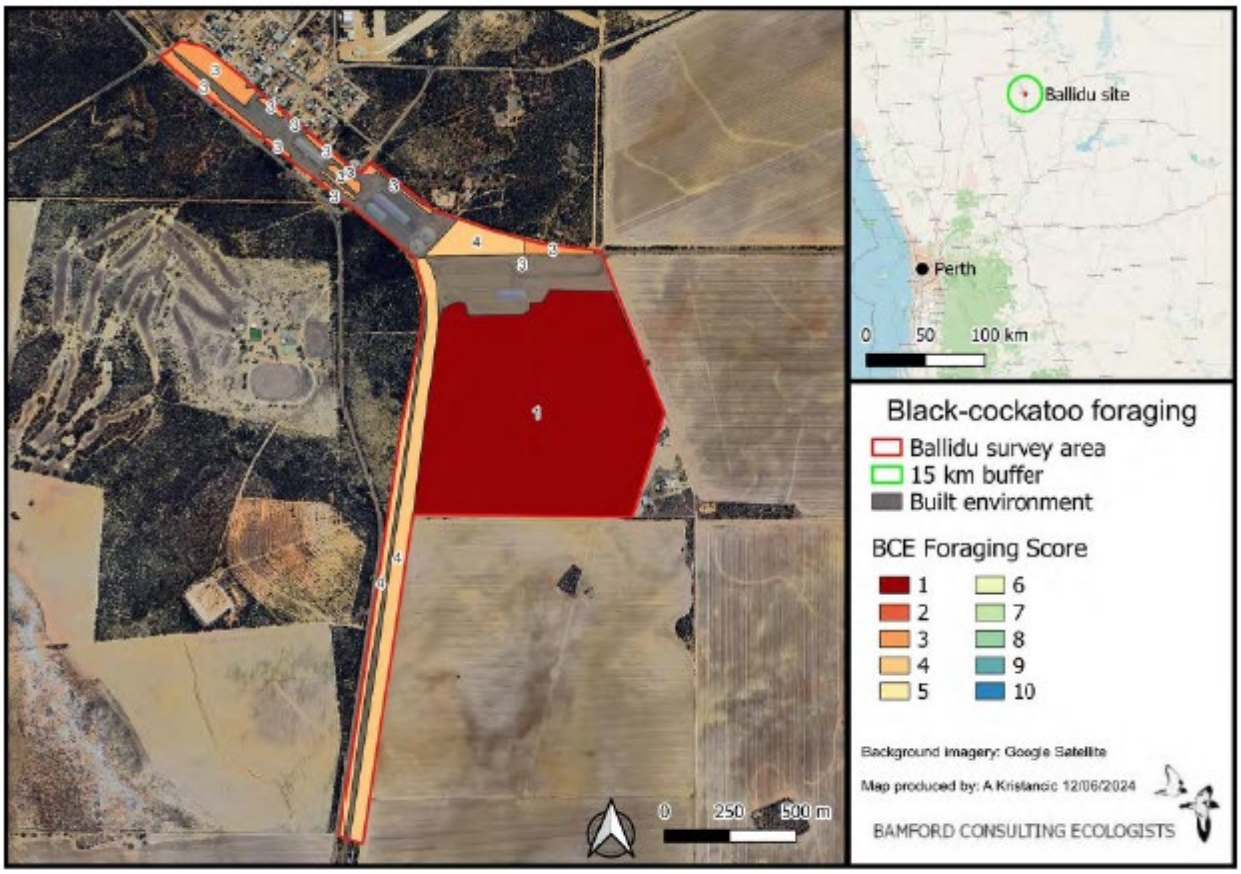


Figure 13. Distribution of Carnaby's cockatoo foraging scores within each VSA (Bamford, 2024)



Figure 14. Active shield-backed trapdoor spider burrow found in November 2023 (Bamford, 2024)



Figure 15. Tree-stem trapdoor spider burrow found in November 2023 (Bamford, 2024)

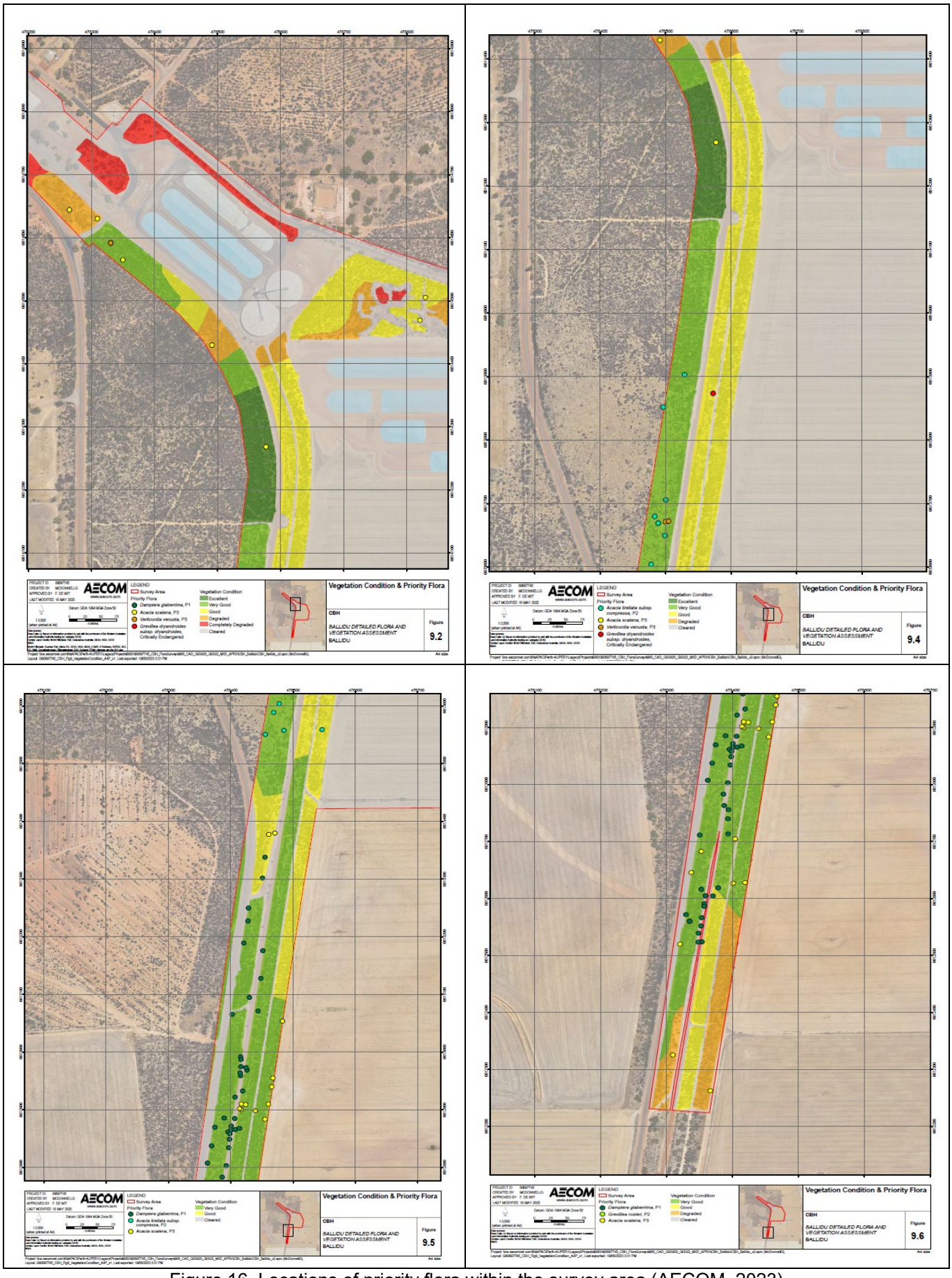


Figure 16. Locations of priority flora within the survey area (AECOM, 2023)

Appendix G. Sources of information

G.1. GIS databases

Publicly available GIS Databases used (sourced from www.data.wa.gov.au):

- 10 Metre Contours (DPIRD-073)
- Aboriginal Heritage Places (DPLH-001)
- Cadastre (LGATE-218)
- Contours (DPIRD-073)
- DBCA – Lands of Interest (DBCA-012)
- DBCA Legislated Lands and Waters (DBCA-011)
- Directory of Important Wetlands in Australia – Western Australia (DBCA-045)
- Environmentally Sensitive Areas (DWER-046)
- Flood Risk (DPIRD-007)
- Groundwater Salinity Statewide (DWER-026)
- Hydrography – Inland Waters – Waterlines
- Hydrological Zones of Western Australia (DPIRD-069)
- IBRA Vegetation Statistics
- Imagery
- Local Planning Scheme – Zones and Reserves (DPLH-071)
- Native Title (ILUA) (LGATE-067)
- Offsets Register – Offsets (DWER-078)
- Pre-European Vegetation Statistics
- Public Drinking Water Source Areas (DWER-033)
- Ramsar Sites (DBCA-010)
- Regional Parks (DBCA-026)
- Remnant Vegetation, All Areas
- RIWI Act, Groundwater Areas (DWER-034)
- RIWI Act, Surface Water Areas and Irrigation Districts (DWER-037)
- Soil Landscape Land Quality – Flood Risk (DPIRD-007)
- Soil Landscape Land Quality – Phosphorus Export Risk (DPIRD-010)
- Soil Landscape Land Quality – Subsurface Acidification Risk (DPIRD-011)
- Soil Landscape Land Quality – Water Erosion Risk (DPIRD-013)
- Soil Landscape Land Quality – Water Repellence Risk (DPIRD-014)
- Soil Landscape Land Quality – Waterlogging Risk (DPIRD-015)
- Soil Landscape Land Quality – Wind Erosion Risk (DPIRD-016)
- Soil Landscape Mapping – Systems

Restricted GIS Databases used:

- ICMS (Incident Complaints Management System) – Points and Polygons
- Threatened Flora (TPFL)
- Threatened Flora (WAHerb)
- Threatened Fauna
- Threatened Ecological Communities and Priority Ecological Communities

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Co-Operative Bulk Handing Ltd (2026d) *Ballidu Rail Out-loading Project, Construction Environmental Management Plan*, received 24 June 2026 (DWER Ref: DWERVT19602).

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