12th February 2026

Coogee Energy Pty Ltd
171 Fitzgerald Road,
Laverton North 3026

Attention: Jeff Muller (Project Manager)
By email — Jeff.Muller@coogee.com.au (M 0407 821 781)

Dear Jeff,

RE: 171 – 181 FITZGERALD ROAD, LAVERTON NORTH (COOGEE ENERGY SITE)
COOGEE ENERGY LAVERTON SITE – COMPLIANCE REPORT
NATURE ADVISORY REF. NO. 22019.03

1.1. Background

In 2013, Coogee Energy Pty Ltd engaged the former Brett Lane & Associates, now Nature Advisory Pty Ltd to conduct a flora and fauna assessment and targeted flora survey for a 2.86 hectare area of land at 171 Fitzgerald Road, Laverton North. This assessment was required to accompany a planning permit application for the proposed development of the land to the west of the existing Coogee Methanol Plant. The project, including the removal of native vegetation, received a planning permit from the City of Wyndham on 15th July 2015.

A subsequent Matters of National Environmental Significance (MNES) assessment concluded that the following impacts on MNES would occur as a result of the proposed development:

- Likely significant impact on 2.58 hectares of Natural Temperate Grassland of the Victorian Volcanic Plain (NTGVVP) - listed as critically endangered under the EPBC Act;
- Likely significant impact on 2.58 hectares of Golden Sun Moth habitat - listed as Critically Endangered at the time but since re-listed as Vulnerable.
- Likely significant impact on 2.61 hectares of Striped Legless Lizard habitat – listed as vulnerable under the EPBC Act; and
- Likely significant impact on Spiny Rice-flower – listed as critically endangered under the EPBC Act, with between 23 and 35 plants to be removed.

The expansion of the Coogee Energy Pty Ltd Methanol Plant at the above address received approval under the EPBC Act (EPBC 2013/6837) on 14th October 2014, with a variation to the approval signed off on 25th May 2015 correcting an earlier condition related to the Striped Legless Lizard offset. Construction commenced 14 November 2024, as such, compliance reporting is required to be provided within 3 months after the anniversary of construction commencing. This report has been prepared to satisfy this requirement.

This investigation has been conducted to assess compliance with the requirements of the EPBC approval, namely the successful implementation of the relevant Site Environment Management Plan (SEMP) and Offset Management Plan (OMP).

1.2. Methods

The field assessment was conducted on the 13th November 2025. During this assessment, the study area was inspected on foot, with the implementation of SEMP measures reviewed in detail. Representative photos of management measures were also taken during this assessment, to better demonstrate their implementation.

Compliance with the OMP measures has meanwhile been based upon detailed records, as provided by the relevant landowner.

1.3. Results

Table 1 below outlines an overview of the required management actions and compliance, as determined during the field assessment and relevant monitoring reports.

Table 1: Compliance with management measures

Section reference	Requirement	Standard outcome observed on site and described in documentation provided	Compliance	Recommendations to achieve compliance
Site Environment Management Plan (SEMP)				
7-8	**Noise** EPA Victoria and Council requirements must be adhered to in relation to the level of noise and working hours, to ensure that residents and other applicable neighbours to the site are not disturbed unreasonably. The generation of noise must be minimised.	Not applicable - outside scope of environmental assessment.	Compliance not assessed.	Proponent to provide evidence of noise management to confirm compliance.
10-13	**Dust** Dust generation must be minimised to ensure there is no health risk or loss of amenity.	The entire site has been scraped and all native vegetation outside the buffer zone has been removed. There is currently no evidence of soil stabilisation works. The client has advised that due to a disruption to construction interim dust control measures such as spraying with water trucks are currently being implemented as required during the interim period between construction.	Partially compliant	Establish sterile Rye Grass across scraped areas, to minimise potential for dust generation. This is also expected to limit the reestablishment of weed infestations. Issues of dust generation are expected to reduce as construction is able to continue.
14-20	**Erosion and sediment** Erosion and sediment must be managed in accordance with current best practice environmental management practices, to prevent sediment-laden water from entering any drainage system or natural waterway.	Sediment fencing in place, though in poor condition. However, the ground is sloping away from the buffer area. This is expected to prevent run-off into the buffer.	Partially compliant.	Repair sediment fencing and ensure ongoing maintenance to achieve full compliance.
21-24	**Waste** Litter and waste must be contained on site, before disposal in a responsible manner. Waste generation must be minimised.	No litter or waste identified within the site. This indicates minimal waste generation and appropriate storage and disposal.	Compliant.	Compliance to be maintained through continued waste management efforts.
25-28	**Chemicals** Storage and spill management practices must be implemented to ensure that no environmental damage can result from the escape or spillage of chemicals or fuels.	Not applicable - outside scope of environmental assessment.	Compliance not assessed.	Proponent to provide evidence of storage and spill management protocol to confirm compliance.
29	**Significant Flora/Fauna** All significant flora and fauna on and adjacent to the site must be protected.	A 10-metre buffer has been appropriately protected with permanent fencing and suitable signage. This is considered sufficient to limit impacts to the adjacent William Angliss Grassland Reserve. Biomass levels are very high within the buffer and high-threat weed infestations are prominent.	Compliant	Compliance to be maintained through continued exclusion of works within buffer. Ecological burns or slashing are advised in the buffer, to reduce biomass levels and assist with weed control.

Section reference	Requirement	Standard outcome observed on site and described in documentation provided	Compliance	Recommendations to achieve compliance
30	**Archaeological/Heritage** Places, sites and objects of archaeological or heritage significance must be protected.	Not applicable - outside scope of environmental assessment.	Compliance not assessed.	Proponent to provide evidence of any efforts to protect archaeological/heritage values to confirm compliance.
31	**Weed control** The aim of weed control in the construction zone and protected buffer is to prevent the spread of high-threat weeds into the adjacent William Angliss Grassland Reserve.	No evidence of weed control noted onsite. Significant outbreaks of Chilean Needle-grass, Sifton Bush, Ribwort, Brassica, Serrated Tussock and Oat identified. Minor outbreaks of Artichoke Thistle and Spear Thistle also identified.	Non-compliant	Engage a suitably-qualified contractor to conduct weed control, with priority weeds (identified in SEMP) being the primary focus of future control efforts. Weed control should be focused in the buffer area on a quarterly basis, as the site is otherwise being colonised by low-threat opportunistic weeds.
32	**Pest animal control** All pest animals are to be monitored and controlled as required within the construction zone and protected buffer for the duration of construction activities.	No pest animal activity identified onsite.	Compliant.	Compliance to be maintained through ongoing monitoring of pest animals and subsequent control as required.
Offset Management Plan (OMP)				
Section 4.4.1	**Offset zone boundaries** Prepare survey plans of offset zones boundaries at commencement of plan.	Zone boundaries clearly described in Nature Advisory OMP.	Compliant.	No further action needed.
Section 4.5	**Undertake baseline weed cover survey of the offset site** Overall weed cover documented; cover of each high threat woody weed species documented.	Weed cover documented in Nature Advisory OMP. Baseline data has also been determined in the 2017 monitoring assessment by Plume Ecology Pty Ltd.	Compliant.	No further action needed.
Section 4.4.1	**Access control** Fencing must prevent unregulated access.	Fencing maintained and successfully restricts unauthorised access	Compliant.	Continue to monitor fencing year-round and repair as required.
Section 4.4.3	**Pest animal control** Pest animals monitored and controlled as required	Spotlighting transects and shooting occurred August 2024 & February 2025. Rabbit numbers remain negligible. Fox numbers fluctuate seasonally. Note that kangaroo numbers are increasing.	Compliant.	Continue implementing pest animal control as described. Closely monitor pressures associated with Kangaroo grazing and implement controls (e.g. Kangaroo-proof fencing) if required.
Section 4.4.4	**Biomass reduction through pulse-grazing** Grassy biomass layer reduced. Inter-tussock spaces maintained at or near 20% to optimise ecological function.	Livestock Grazing occurred 2024 1st July – 31st October (approx. 400 dry ewes) Period: 2-5 days 2025 1st February – 8th March (approx. 300 ewes) Period: 1 light rotation through all paddocks with 2 day graze then removed	Compliant.	Continue to utilise stock grazing when seasonally appropriate and in accordance with biomass control targets.

Section reference	Requirement	Standard outcome observed on site and described in documentation provided	Compliance	Recommendations to achieve compliance
	To the extent that it can be controlled, vegetation cover does not fall below 70%.	Stock type: merino XB Very poor seasonal conditions. Again, there was low biomass produced due to low rainfall. Stocking rate and graze timing was therefore reduced. Stock will be excluded until there has been some growth to protect groundcover.		
Section 4.4.4	**Biomass reduction through ecological burning** Grassy biomass layer reduced. Recruitment of native species enhanced. No more than half the area burnt in any one year (i.e. patch burns).	Not deemed necessary. Biomass control has been achieved through pulse-grazing	Not applicable.	Implement ecological burning if pulse-grazing is no longer deemed effective.
Section 4.4.2	**Weed control** Weed cover does not exceed cover at commencement of plan. Eliminate any high threat woody weeds (<1% cover). Monitor all new and emerging weeds and if detected, eliminate from the offset site.	Strategic grazing used to manage weeds. Weeds within benchmark levels. No new infestations.	Compliant.	Continue to implement weed control measures as required.
Appendix 3	**Golden Sun Moth targeted survey** Monitor population from November to January in Years 1, 4, 7 & 10.	It is understood that surveys have been conducted in previous years. As of Year 7, there is no suspected absence of Golden Sun Moth population.	Compliant.	Conduct monitoring in Year 10, as per OMP.
Appendix 4	**Striped Legless Lizard targeted survey (tile grids)** Determine presence and monitor population from September to December in Years 1, 4, 7 & 10.	It is understood that surveys have been conducted in previous years. As of Year 7, no population presence has not been established.	Compliant.	Conduct monitoring in Year 10, as per OMP.
Appendix 5	**Spiny Rice-flower targeted survey** Monitor population from April to August in Years 1, 4, 7 & 10.	It is understood that surveys have been conducted in previous years. As of Year 7, no marked decrease in Spiny Rice-flower in Offset Zone A.	Compliant.	Conduct monitoring in Year 10, as per OMP.
Section 4.6	**Monitoring of habitat quality against KPIs (where applicable)** Monitor from September to November in Years 4, 7 & 10 Document habitat quality against KPIs; identify contingency measures	Monitoring against KPIs is detailed in the Year 7 monitoring report. All KPIs have been met/achieved.	Compliant.	Conduct monitoring in Year 10, as per OMP.
Section 4.7	**Report to be prepared documenting management actions undertaken and monitoring results** Report delivered to the Responsible Authority no later than three months after end of year.	Only Years 7 and 9 reports have been provided. However, the references of the Year 7 report detail past assessments in Years 1 and 4, in accordance with the specified OMP timeline.	Compliant.	Prepare and provide relevant report for Year 10 monitoring, following assessment.

Compliance with the above requirements is discussed in detail below.

1.3.1. SEMP compliance

Noise

The primary means of ensuring management of noise levels is through appropriate scheduling of work hours (i.e. 7am to 5pm Monday-Friday and 8am to 1pm Saturday), locating noisy activities as far away from neighbours as possible and scheduling noisy activities for the least sensitive times of day.

The implementation of noise controls could not be ascertained during this assessment, given that it was limited to a single day and work scheduling could not be observed. Therefore, to confirm compliance, evidence of the aforementioned noise controls will be required.

Dust

Dust suppression is to be achieved by limiting dust generation (i.e. minimising exposed ground), carrying out dust suppression activities (e.g. spraying exposed ground) and ensuring works are not conducted on dry windy days.

At the time of assessment, all vegetation had been stripped within the site (Photo 1), with the exception of the protected buffer area and areas where a sparse cover of weeds had reestablished. This large-scale removal of vegetation has resulted in exposed bare ground across the majority of the site, which has a high likelihood of resulting in the spread of dust on dry windy days. The clearing of vegetation should have therefore been staged, to minimise exposed bare ground onsite.

Photo 1: Bare ground, present across the majority of the site.

The client has advised that due to a disruption to construction, interim dust control measures such as spraying with water trucks are currently being implemented as required during the interim period between construction. Issues of dust generation are expected to reduce as construction is able to continue.

On this basis, dust control is deemed partially compliant with the SEMP.

Recommendations to support compliance are provided in Section 1.4.1.

Erosion and sediment

Erosion and sediment control is to be achieved through drainage management, soil stabilisation, stockpile protection, sediment traps, dewatering and appropriate vehicle and road management.

At the time of assessment, the primary erosion and sediment control comprised sediment fencing, which had been established around the periphery of the site (Photo 2). This fencing was found to be in poor condition in many areas, indicating that it has not been maintained since its initial establishment.

Photo 2: Sediment fencing, occurring adjacent to the buffer zone.

However, given the topography of the site, the works area occurred downslope of the protected buffer zone. As a result, all drainage appeared to occur internally, with run-off having drained into small depressions within the works area. Furthermore, due to this downslope position, it is considered unlikely that sedimentation will occur in the buffer area.

As mentioned in the previous section detailing dust control, exposed bare ground is also likely to be prone to wind-induced erosion. Erosion controls, which are primarily achieved through staged removal of vegetation, have therefore not been appropriately implemented.

On this basis, erosion and sediment control is only partially compliant with the SEMP.

Recommendations to enable full compliance are provided in Section 1.4.1.

Waste

Waste management is primarily achieved through compliance with EPA standards for imported fill, recycling of materials where feasible and appropriate waste storage and disposal.

The assessment did not identify any litter or waste buildup within the work site or the protected buffer zone. This indicates that waste is being managed appropriately.

Therefore, waste management is deemed compliant with the SEMP.

Chemicals

The primary means of ensuring safe chemical use is through suitable storage, appropriate spill management and the restriction of refuelling to a designated area.

The implementation of chemical controls could not be ascertained during this assessment, given that implementation of these measures is not readily observed outside of active works periods. To confirm compliance, evidence of the aforementioned chemical controls will be required.

Significant Flora/Fauna

The protection of significant flora and fauna values, which comprises the adjacent Williams Angliss Grassland Reserve, is to be achieved through the provision of a buffer area (5-metres width) of retained EPBC Act-listed *Natural Temperate Grassland of the Victorian Volcanic Plain* (NTGVVP). This must include fencing and signage around its extent, detailing its conservation value and preventing unauthorised access.

The assessment determined that a 10-metre-wide buffer area had been protected along the shared boundary with the Williams Angliss Grassland Reserve. Access in this area has also been restricted through the provision of permanent fencing and signage detailing its conservation value (Photo 3). These controls were considered sufficient to prevent unauthorised access to the buffer zone and to limit edge effects to the William Angliss Grassland Reserve.

Photo 3: Protected buffer area, including permanent fencing and conservation area signage.

However, during the assessment, a range of high-threat weeds were found to have established in this buffer area and biomass levels were considered to be very high. Therefore, in recognition of the conservation value of the NTGVVP, this buffer area should be managed for these threats.

Based on the above, the protection of significant flora and fauna values was deemed compliant with the SEMP. However, more ecologically sensitive management of the buffer zone is advised.

Recommendations to better maintain the buffer zone are provided in Section 1.4.1.

Archaeological/ Heritage

No specific measures to ensure protection of archaeological and heritage values are identified in the SEMP. However, these may consist of consultation with traditional owners, implementation of archaeological surveys and limiting work activities where sensitive values are identified.

This aspect of the SEMP implementation is outside the scope of an environmental assessment and therefore compliance can not be confirmed. To determine compliance, evidence of relevant measures will be required.

Weed control

Weed control is required to limit the spread of weeds to the William Angliss Grassland Reserve. Accordingly control of priority weeds is required and these species include African Box-thorn, Sifton Bush, Chilean Needle Grass, Flatweed, Horehound, Galenia, Soursob, Ox tongue, Ribwort, Buck's-horn Plantain, Sticky Ground-cherry, Brassica species and Thistle species. Additionally, cleaning of vehicles and machinery is required when entering and leaving the site.

During the assessment, no evidence of weed control was identified onsite. Furthermore, there had been significant outbreaks of Chilean Needle-grass, Serrated Tussock, Ribwort, Sifton Bush, Brassica and Oats within the buffer zone (Photo 4). Though of comparatively limited extent, outbreaks of Artichoke Thistle and Spear Thistle were also noted. This poses a notable threat to the William Angliss Grassland Reserve, given the high likelihood that seed from these infestations will spread beyond the buffer zone.

Photo 4: High-thread weed infestations in the buffer zone, consisting of Serrated Tussock and Ribwort.

The site was otherwise being colonised by a range of low-threat opportunistic weeds where native vegetation had been removed. These weeds are unlikely to constitute a notable threat and may even assist in stabilising the bare ground where they have established.

On this basis, weed control is deemed non-compliant with the SEMP.

Recommendations to support compliance are provided in Section 1.4.1.

Pest animal control

Pest animal control is to be achieved through rabbit baiting (twice yearly), fumigation and collapsing of fox dens and rabbit warrens and regular monitoring (at least quarterly).

At the time of the assessment, there was no evidence of pest animal activity onsite. Furthermore, no areas of pest animal harbour were identified, and it is therefore considered unlikely that they will readily reestablish onsite.

On this basis, pest animal control is deemed non-compliant with the SEMP.

1.3.2. OMP compliance

The proponent has been fully compliant with the OMP. Ongoing monitoring is continuing within the offset area and an ecological audit is scheduled to occur in 2026 in compliance with the OMP.

Refer to Appendix 1 and 2 detailed OMP monitoring results.

1.4. Conclusions

Compliance with the SEMP was largely achieved and where compliance is unclear it is anticipated that records can provide clarity. The primary issues with SEMP implementation relate to the potential for dust generation and erosion that has resulted from excessive removal of vegetation,

as well as a lack of weed control in the buffer zone. Insufficient maintenance of sediment fencing was also identified, though sedimentation in the buffer zone and adjacent William Angliss Grassland Reserve is considered unlikely. Ultimately, these issues can be readily resolved, provided the recommendations outlined in Section 1.4.1 are implemented.

1.4.1. Recommendations

The proponent was fully compliant with the OMP and therefore it is only recommended that management measures continue to be implemented as specified in the OMP.

The following recommendations are advised to ensure SEMP compliance:

- Re-establish vegetation (e.g. Sterile Rye Grass) across areas of bare ground where practical, to minimise the potential for dust generation and erosion.
- Engage a suitably qualified contractor to conduct weed control within the buffer zone, and the adjacent works site if required. This should occur on a quarterly basis and must prioritise the control of high-threat weeds, as identified in the SEMP. Given the limited area requiring weed control, compliance is deemed readily achievable.
- Repair sediment fencing and regularly monitor its integrity on a quarterly basis.
- Conduct biomass control within the buffer zone. This may occur in the form of ecological burns or slashing/brush-cutting. Importantly, intensive follow-up weed control will be necessary following biomass control efforts.

Yours sincerely,

Chris Armstrong

Team Lead – Development and conservation
Nature Advisory Pty Ltd

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References

BL&A 2016, *Terrinallum South, 833 Pura Road Darlington Offset Management Plan - Report No. 13009 (5.9),* Brett Lane & Associates Pty Ltd, Hawthorn Victoria. Consultant report prepared for Coogee Energy Pty Ltd.

Nature Advisory 2023, *Site Environmental Management Plan – Report 22019.2 (2.3)*, Nature Advisory, East Hawthorn. Consultant report prepared for Coogee Energy Pty Ltd.

Plume Ecology 2023, *Monitoring Report – Year 7 'Coogee' State Vegetation and MNES Offsets,* Plume Ecology Pty Ltd. Consultant report prepared for Tom Clavert.

Tom Calvert 2025, *Landholder Monitoring Report Number 9 2025,* Tom Calvert (Landholder), Darlington. Report prepared for Coogee Energy Pty Ltd.

Appendix 1: OMP Monitoring Report (Year 7)

Monitoring Report – Year 7

‘Coogee’ State Vegetation and MNES Offsets

Report prepared for: Tom Calvert

Offset Address: 833 Pura Road, Darlington Victoria

EPBC Offset Site Number: EPBC 2013/6837

Report prepared by: Lauren Eddy (Plume Ecology P/L) 2023

Spiny Rice-flower *Pimelea spinescens* subspecies *spinescens*

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1. Background:

Plume Ecology Pty Ltd was engaged to conduct ecological monitoring of offsets at 833 Pura Road, Darlington Victoria. Monitoring requirements are set out in the approved offset management plan titled 'Terrinallum South, 833 Pura Road Darlington - Offset Management Plan' (BL&A, 2016).

The sites are described in the offset plan (BL&A, 2016):

- **Offset Zone A** – An area of grassland habitat that supports a thriving Spiny Rice-flower population. This area will be protected and managed to achieve the required Commonwealth offset for Spiny Rice-flower.
- **Offset Zone B** – A large area of Natural Temperate Grassland of the Victorian Volcanic Plain (NTGVVP), in which Golden Sun Moth (GSM) have also been recorded. This area will be protected and managed to achieve the required state native vegetation (grassland) offsets as well as the Commonwealth offsets for Natural Temperate Grassland of the Victorian Volcanic Plain, Golden Sun Moth and Striped Legless Lizard (SLL).
- **Offset Zone C** – A small area of wetland that will be protected and managed to achieve the state native vegetation (wetland) offsets.

2. Aim:

The aim of the data collection and monitoring work is to satisfy the requirements set out in sections 4.6 (Monitoring) and 4.7 (Reporting) of the approved offset management plan (BL&A, 2016) for Year 7. This includes an assessment against Key Performance Indicators (KPIs) for MNES-specific plans: NTGVVP, Spiny Rice-flower, Golden Sun Moth and Striped Legless Lizard.

3. Methodology:

Natural Temperate Grassland of the Victorian Volcanic Plain (Commonwealth) and state native vegetation offsets – monitoring/assessments of weed cover undertaken on the 27th December 2022 (spring was very late this year).

Targeted Golden Sun Moth targeted survey – undertaken on 27th December 2022 and the 1st January 2023. Very limited suitable survey days this flight season.

Targeted Spiny Rice-flower Survey – undertaken on the 21st August 2022 (habitat assessments to inspect weeds and biomass were also undertaken on the 27th December 2022). Spiny Rice-flower population monitoring involved a targeted survey, where known populations were revisited and transect monitoring undertaken within the offset zone. A handheld GPS (Garmin GPS60) was to collect point data. The timing of the Spiny Rice-flower survey was scheduled during the flowering season for optimal detectability of plants.

Targeted Striped Legless Lizard – undertaken the 21st August 2022, 27th December 2022 and 1st January 2023. A non-invasive active searching technique was employed as the targeted survey method. This involved rock turning (surface rock only, minimal disturbance, lifting one end only (not complete removal), rock returned back carefully and placed in the exact same position) and targeted hand-searching for individuals in and around the base of native grass tussocks in early morning to early-afternoon (min. 4hrs each day) within Offset Zone B.

4. Results:

Table 1: Year Seven Monitoring (Weed Cover and KPIs within each zone):

Component	Year Seven Monitoring Results
Offset Zone A • Spiny Rice-flower • Weed Cover	Spiny Rice-flower (SRF) population stable, however the Kangaroo-grass cover is quite dense in some areas and plants were more difficult to detect during this survey event (compared with previous surveys). Total count for Spiny Rice-flower (winter survey 2022) population monitoring within Offset Zone A = 140 plants recorded. - *Total count for Spiny Rice-flower (winter survey 2020) population monitoring within Offset Zone A = 143.* - *Total count for Spiny Rice-flower (winter survey 2017) population monitoring within Offset Zone A = 141.* - *Total initial count in 2014 for Spiny Rice-flower population within Offset Zone A = 140 (BL&A 2016).* Dominant species = Kangaroo Grass and *Poa* Tussock with some Spear Grass and a high cover of Lemon Beauty-heads. Organic litter cover optimal - mostly native litter, recruitment potential low-moderate. Inter-tussock space has slightly decreased since previous assessment. Native perennial grass cover remains high within offset zone, which assists with crowding out weeds, but can also reduce recruitment potential and long-term presence of SRF (hence the need to monitor SRF population). Spring Year 7: Herbaceous Weed Cover: Thistles (<1%) (baseline <1%) = static Flatweed (1%) (baseline 2%) = static Spring Year 7: Annual Grassy Weed Cover: Fescue (1%) (baseline <5%) = decrease Wild Oats (5%) (baseline 5-<10%) = decrease Spring Year 7: Perennial Grassy Weed Cover: Ryegrass <5% (baseline <5%) = static Phalaris <5% (baseline <5%) = static Spring Year 4 high-threat woody weed cover: 0% (baseline 0%) = static No new or emerging weeds detected.

Offset Zone B • Golden Sun Moth • Striped Legless Lizard • Weed Cover	Continued presence of a Golden Sun Moth (GSM) population confirmed during the 2022/23 flight season survey, however GSM numbers were very low this year as a result of wet site conditions and unsuitable survey conditions for the majority of the local GSM flight season. The offset site continues to support optimal GSM habitat, but the site experienced a very wet winter and spring, with soils remaining saturated well into the expected/usual GSM flight season. Even when soils dried out, suitable survey days (weather conditions) were very limited. Refer to recommendations. Striped Legless Lizards were not detected during the year 7 targeted surveys, however the offset site continues to provide suitable habitat for the species with a mix of native tussock habitat, cracking clay soils and both surface and embedded rock – see photos in Appendix 1. Native perennial grass cover remains high within offset zone. Spring Year 7 Herbaceous Weed Cover: Thistles (<1%) (baseline <1%) = static Flatweed (1%) (baseline <2%) = decrease Spring Year 7 Annual Grassy Weed Cover: Fescue (<5%) (baseline <5%) = static Wild Oats (5-<10%) (baseline 5-<10%) = static Spring Year 7 Perennial Grassy Weed Cover: Ryegrass (<5%) (baseline <5%) = static Yorkshire Fog (<10%) (baseline 1%) = increase Phalaris (5%) (baseline <5%) = slight increase Spring Year 7 high-threat woody weed cover: 0% (baseline 0%) = static No new or emerging weeds detected.
Offset Zone C • Weed Cover	Native perennial grass cover remains high within offset zone. Spring Year 7 Herbaceous Weed Cover: Flat-weed (1%) (baseline <1%) = decrease Spring Year 7 Annual Grassy Weed Cover: Barley Grass (1%) (baseline <1%) = decrease Wild Oats (2%) (baseline 2%) = static Spring Year 7 Perennial Grassy Weed Cover: Phalaris (5%) (baseline 5%) = static Spring Year 7 high-threat woody weed cover: 0% (baseline 0%) = static No new or emerging weeds detected.

5. Assessment of Key Performance Indicators (KPIs):

5.1 Natural Temperate Grassland of the Victorian Volcanic Plain – MNES-specific Offset Management Plan

Control of Access KPIs:

- Fencing maintained and unauthorised access is restricted - achieved

Weed Control KPIs:

- Weed cover does not exceed cover at commencement of the plan - **achieved, with the exception of Yorkshire Fog which appears to be prevalent across the wider district this season as a result of seasonal conditions for the past 2-3 years. Refer to recommendations.**
- High threat woody weeds eliminated (<1% cover) - **achieved**
- All new and emerging weeds eliminated if detected - **achieved**
- Weed cover or weed control measures do not reduce the quality and extent of NTGVVP - **achieved**

Pest Animals KPIs:

- Pest animals controlled - **achieved**
- The quality and extent of NTGVVP not impacted by pest animals or pest animal control measures - **achieved**

Biomass Management – Grazing KPIs:

- Grassy biomass layer reduced - **achieved**
- Inter-tussock spaces will be maintained at 20% to optimize the recruitment area for native vegetation - **achieved**
- The vegetation cover will not fall below 70% as this would lead to a reduction in the condition of NTGVVP - **achieved**
- Grazing does not reduce the quality and extent of NTGVVP - **achieved**

Biomass Management – Ecological Burning KPIs:

- Grassy biomass layer reduced - **n/a (managed via grazing)**
- Inter-tussock spaces will be maintained at 20% to optimize the recruitment area for native vegetation - **n/a (managed via grazing)**
- The vegetation cover will not fall below 70% as this would lead to a reduction in the condition of NTGVVP - **n/a (managed via grazing)**
- Ecological burn does not reduce the quality and extent of NTGVVP - **n/a**

No corrective actions or contingency measures are required and no risk analysis has been triggered by the results for NTGVVP offset monitoring (no marked increase in population of pest animals in Offset Zones A and B, no marked decline in quality of vegetation community in Offset Zones A and B and no marked increase in weed species cover in Offset Zones A and B.

5.2 Golden Sun Moth – MNES-specific Offset Management Plan

Control of Access KPIs:

- Fencing maintained and restricts unauthorised access - **achieved**

Weed Control KPIs:

- Weed cover does not exceed cover at commencement of the plan - achieved
- High threat woody weeds eliminated (<1% cover) - **achieved**
- All new and emerging weeds eliminated if detected - **achieved**
- Weed cover or weed control measures do not reduce the quality and extent of Golden Sun Moth habitat - **achieved**

Pest Animal KPIs:

- Pest animals controlled - **achieved**
- The quality and extent of Golden Sun Moth habitat not impacted by pest animals or pest animal control measures - **achieved**

Biomass Management – Grazing KPIs:

- Grassy biomass layer reduced - **achieved**
- Inter-tussock spaces will be maintained at 20% to optimize the recruitment area for native vegetation - **achieved**
- The vegetation cover will not fall below 70% as this would lead to a reduction in the condition of Golden Sun Moth habitat - **achieved**
- Grazing does not reduce the quality and extent of Golden Sun Moth habitat - **achieved**

Biomass Management – Ecological Burning KPIs:

- Grassy biomass layer reduced - **n/a (managed via grazing)**
- Inter-tussock spaces will be maintained at 20% to optimize the recruitment area for native vegetation - **n/a (managed via grazing)**
- The vegetation cover will not fall below 70% as this would lead to a reduction in the condition of Golden Sun Moth habitat - **n/a (managed via grazing)**
- Ecological burn does not lead to a permanent reduction in the quality and extent of Golden Sun Moth habitat - **n/a**

No corrective actions or contingency measures are required and no risk analysis has been triggered by the results for Golden Sun Moth offset monitoring (no suspected absence of Golden Sun Moth population). The season was not suitable for GSM emergence, and a repeat survey is recommended to be carried out in the 2023/2024 flight season. Refer to recommendations.

5.3 Striped Legless Lizard – MNES-specific Offset Management Plan

Control of Access KPIs:

- Fencing maintained and restricts unauthorised access - **achieved**

Weed Control KPIs:

- Weed cover does not exceed cover at commencement of the plan - achieved
- High threat woody weeds eliminated (<1% cover) - **achieved**
- All new and emerging weeds eliminated if detected - **achieved**
- Weed cover or weed control measures do not reduce the quality and extent of Striped Legless Lizard habitat - **achieved**

Pest Animal KPIs:

- Pest animals controlled - **achieved**
- The quality and extent of Striped Legless Lizard habitat not impacted by pest animals or pest animal control measures - **achieved**

Biomass Management – Grazing KPIs:

- Grassy biomass layer reduced - **achieved**
- Inter-tussock spaces will be maintained at 20% to optimize the recruitment area for native vegetation – **achieved**
- The vegetation cover will not fall below 70% as this would lead to a reduction in the condition of Striped Legless Lizard habitat - **achieved**
- Grazing does not reduce the quality and extent of Striped Legless Lizard habitat - **achieved**

Biomass Management – Ecological Burning KPIs:

- Grassy biomass layer reduced - **n/a (managed via grazing)**
- Inter-tussock spaces will be maintained at 20% to optimize the recruitment area for native vegetation - **n/a (managed via grazing)**
- The vegetation cover will not fall below 70% as this would lead to a reduction in the condition of Striped Legless Lizard habitat - **n/a (managed via grazing)**
- Ecological burn does not lead to a permanent reduction in the quality and extent of Striped Legless Lizard habitat - **n/a**

No corrective actions or contingency measures are required and no risk analysis has been triggered by the results for Striped Legless Lizard offset monitoring (no suspected loss of Striped Legless Lizard population, as population presence has not been established).

5.4 Spiny Rice-flower – MNES-specific Offset Management Plan

Control of Access KPIs:

- Fencing maintained and restricts unauthorised access – **achieved**

Weed Control KPIs:

- Weed cover does not exceed cover at commencement of the plan - **achieved**
- High threat woody weeds eliminated (<1% cover) - **achieved**
- All new and emerging weeds eliminated if detected - **achieved**
- Weed cover or weed control measures do not reduce the Spiny Rice-flower population - **achieved**

Pest Animal KPIs:

- Pest animals controlled - **achieved**
- The Spiny Rice-flower population not impacted by pest animals or pest animal control measures - **achieved**

Biomass Management – Grazing KPIs:

- Grassy biomass layer reduced - **achieved**
- Inter-tussock spaces will be maintained at 20% to optimize the recruitment area for native vegetation - **achieved across site, but vegetation cover is getting dense in some areas and will benefit from an additional assessment prior to next scheduled survey event (i.e. in a drier season) – refer to recommendations.**
- The vegetation cover will not fall below 70% as this would lead to a reduction in the condition of NTGVVP (Spiny Rice-flower habitat) - **achieved**
- Grazing does not reduce the Spiny Rice-flower population - **achieved**

Biomass Management – Ecological Burning KPIs:

- Grassy biomass layer reduced - **n/a (managed via grazing)**
- Inter-tussock spaces will be maintained at 20% to optimize the recruitment area for native vegetation - **n/a (managed via grazing)**
- The vegetation cover will not fall below 70% as this would lead to a reduction in the condition of NTGVVP (Spiny Rice-flower habitat) - **n/a (managed via grazing)**
- Ecological burn does not reduce the Spiny Rice-flower population - **n/a**

No corrective actions or contingency measures are required and no risk analysis has been triggered by the results for Spiny Rice-Flower offsets (no marked decrease in Spiny Rice-flower in Offset Zone A). Following a recommended additional biomass assessment, biomass management actions may be further refined for the remainder of the 10-year offset management period (to benefit future Spiny Rice-flower recruitment potential if necessary).

6. Management Recommendations:

In order to maintain and further improve the quality and condition of the vegetation the following management actions are recommended for consideration, subject to seasonal conditions and any other factors that may influence management choices (including specific offset requirements and the strategic management considerations of the Spiny Rice-flower population within Offset Zone A and fauna considerations within Offset Zone B):

6.1 **Offset Zones A and B:** To increase the amount of inter-tussock space and available space for recruitment within the offset zones (in Offset Zone A, this will be the areas dominated by *Themeda triandra* Kangaroo-grass), undertaking low intensity patch/mosaic burning (where practical) should be considered. For Offset Zone B this will also serve to decrease weed cover if required. Burning would need to be undertaken outside of the Golden Sun Moth flight season and consideration must be given to the active growth period of the Spiny Rice-flower and active period of the Striped Legless Lizard (ensure that deep soil cracks/refuge are available). Burning would also require further targeted follow-up work to control any re-emerging infestations of weed species.

6.2 **Offset Zones A and B:** Where it is determined that patch burning is not practical or is unsuitable for any other reason, higher intensity strategic pulse grazing (incorporated as part of the current grazing management strategy to continue to manage biomass and further increase inter-tussock space) may be considered. The offset site could be grazed with more intensity than it has been without compromising vegetation quality (however, grazing regime in Offset Zone A must consider the protection of Spiny Rice-flower plants). Biomass levels could be assessed after the next spring season, to determine conditions following a drier spring/summer if such conditions are experienced. Grazing options/regime could then be refined if required.

6.3 **Offset Zone A:** Undertake an additional biomass assessment within the offset zone to ensure that site remains optimal for Spiny Rice-flower, prior to the next scheduled monitoring event (Year 10).

6.4 **Offset Zone B:** Undertake an additional cover assessment within the offset zone for Yorkshire Fog-grass (*Holcus lanatus*) (suggest spring 2023), or at least prior to the next scheduled monitoring event (Year 10).

6.5 **Offset Zone B:** Undertake an additional GSM survey at the next flight season (assuming more suitable soil conditions and survey days are experienced) to supplement this season's GSM survey, as conditions were not suitable for optimal GSM emergence/activity at this location for this monitoring event.

6.6 **All Offset Zones:** Where necessary, controlling grassy weeds in areas immediately adjacent to the offset area may assist in preventing these weeds from spreading seed and/or encroaching into the offset area – particularly applicable to Offset Zone C which is adjacent to terrestrial vegetation and subject to fluctuating moisture levels. Grazing in these adjacent areas has assisted with this recommendation since the Year 1 monitoring.

7. Conclusion:

Year 7 monitoring within all three offset zones has been completed by an ecologist as per the approved offset plan requirements. This includes the collection of Year 7 overall weed cover data for all three offset zones, Spiny Rice-flower (Offset Zone A) and Golden Sun Moth population (Offset Zone B) monitoring and a targeted Striped Legless Lizard survey (Offset Zone B). All KPIs have been met/achieved as per MNES-specific offset management plans. No corrective actions or contingency measures are required and no risk analysis has been triggered by the results for the above MNES-specific offsets. The monitoring data will be used in future data analysis, specifically to inform refinement of management actions for the remainder of the 10-year offset period and to evaluate offset management success. Refined monitoring and management actions have been recommended in Year 7 to manage any potential issues at an early stage, to allow adequate time should corrective actions be required prior to the end of the 10-year offset site management period.

8. References:

BL&A (2016). '*Terrinallum South, 833 Pura Road Darlington Offset Management Plan*.' Report No. 13009 (5.9). Brett Lane & Associates Pty Ltd, Hawthorn Victoria.

BL&A (2014). '*Terrinallum South, 833 Pura Road Darlington Spiny Rice-flower Targeted Surveys*'. BL&A PROJECT NO. 12155.2.

Plume Ecology Pty Ltd (2020). *Golden Sun Moth Monitoring Report - Year Four - Coogee Golden Sun Moth Offset Site August 2020*. Plume Ecology Pty Ltd, Timboon, Victoria.

Plume Ecology Pty Ltd (2017a). *Golden Sun Moth Monitoring Report - Year One. Coogee Golden Sun Moth Offset Site August 2017*. Plume Ecology Pty Ltd, Timboon, Victoria.

Plume Ecology Pty Ltd (2017b). *Baseline Data and Year One Monitoring Report 'Coogee' Offsets, August 2017.* Plume Ecology Pty Ltd, Timboon, Victoria.

9. Appendices

Appendix 1: Survey Photographs

Figure 1: NTGVVP Offset Zone B –27/12/2022.

Figure 2: Male Golden Sun Moth within Offset Zone B – 1/1/2023.

Figure 3: Male Golden Sun Moth within Offset Zone B – 1/1/2023.

Figure 4: Spiny Rice-flower plant within Offset Zone A – 21/08/2022.

Figure 5: Spiny Rice-flower plant within Offset Zone A – 21/08/2022.

Figure 6: Spiny Rice-flower habitat in spring Offset Zone A – 21/8/2022.

Figures 7 & 8: Rock turning survey for Striped Legless Lizard - Offset Zone B – 27/12/2022 & 1/1/2023.

Figure 9: State native wetland vegetation offset - Offset Zone C – 27/12/2022.

Appendix 2: OMP Monitoring Report (Year 9)

"K.G Calvert & Co"
ABN: 59 709 468 042

Contact: Tom Calvert
"Terrinallum South"
833 Darlington-Carranballac Rd,
Darlington, Vic, 3271
Tom: 0418 992 647
e-mail: terrisouth3271@gmail.com

Tom Calvert (Landholder)
Native Vegetation Offset agreement
with Coogee Energy Pty Ltd & Coogee Laverton Pty Ltd

EPBC 2013-6837

Landholder Monitoring Report Number 9
2025

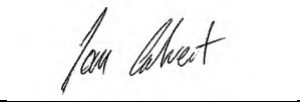
Report Distributed via email to the following parties

- Department of the Environment
  epbcmonitoring@environment.gov.au

- Moyne Shire
  Ms Michelle Grainger
  Manager Planning
  mgrainger@moyne.vic.gov.au

- Mr Grant Lukey
  Methanol Business Manager
  Coogee Energy Pty Ltd
  Via email: Grant.Lukey@CoogeeEnergy.com.au

It would be appreciated it receipt of the report was acknowledged via email. Please note the change of landholder email address.

Landowner of offset site	Tom Calvert		
Location/address of offset site	833 Pura Rd, Darlington, Vic, 3271		
EPBC Offset Site No.	EPBC2013/6837		
Responsible Authority	Department of the Environment & Moyne Shire		
Offset commencement Date	24th May 2016		
Report No. (year since commencement)	9		
Signature:		Date:	08/05/2025

Offset Zone	Management Action	Target to be achieved	Responsible person	Y/N
A, B, C	Monitor and maintain post/wire fencing and gates	Integrity of fencing maintained to exclude unregulated access	Landowner or Fencing contractor	Yes. Note fencing conducted in the wider offset area in August 2023. See previous year landholder reports for details.
A, B, C	Monitoring of pest animals (e.g. rabbits, hares, foxes) and control to be carried out as required	Monitoring year round Late Summer/Autumn	Landowner or Bushland contractor	**Spotlighting transects and shooting** August 2024 & February 2025 Rabbit numbers remain negligible. Fox numbers fluctuate seasonally. Field & Game shooting has not been conducted yet this Autumn. Note that kangaroo numbers are increasing. Continue to monitor this in collaboration with ecologist.
A, B	Biomass reduction through pulse-grazing	Late Summer/Autumn 2-7 days Grassy biomass layer reduced Inter-tussock spaces maintained at/near 20% Vegetation cover not to fall below 70%	Landowner or nominated contractor	**Livestock Grazing** 2024 1st July – 31st October (approx. 400 dry ewes) Period: 2-5 days 2025 1st February – 8th March (approx. 300 ewes) Period: 1 light rotation through all paddocks with 2 day graze then removed Stock type: merino XB Very poor seasonal conditions. Again, there was low biomass produced due to low rainfall. Stocking rate and graze timing was therefore reduced. Only 41mm has been recorded since 1st January compared to the average of 120mm, so stock will be excluded until there has been some growth to protect groundcover. (NB: The offset site is part of a larger area grazed during this period) *See Figure 1.*

A, B	Biomass reduction through ecological burning	Every 3-5 years if required	Nominated contractor	Not required.
A, B, C	Weed control: - Treat high threat weeds - Treat other weeds as required	Autumn/Winter/Spring Hand-weeding/spot spraying Herbicide June-October if required	Landowner or Bushland contractor	Strategic grazing used to manage weeds. Weeds within benchmark levels. No new infestations.
A, B, C	Regular monitoring	Throughout year Ensure management actions are conducted in accordance with this plan	Landowner	Yes, see details of fence, pest animal and weed monitoring, and biomass management above.
B	Targeted survey for Golden Sun Moth	November-January Years 1, 4, 7, 10	Ecologist	Not required.
B	Targeted survey for Striped Legless Lizard	September-December Years 1, 4, 7, 10	Ecologist	Not required.
A	Targeted survey for Spiny Rice-flower	Winter (April to August) Years 1, 4, 7, 10	Ecologist	Not required.
A, B, C	Monitoring of habitat quality against KPIs (where applicable)	September-November Report due end of monitoring year years 4, 7, 10	Ecologist	Not required.
A, B, C	Report to be prepared documenting management actions undertaken and all monitoring results	Due no later than 3 months after end of year	Landholder/Ecologist when required	Herewith the reporting.

Figure 1: Coogee Pty Ltd Offset location at Terrinallum South, Darlington.
(Offset Management Plan: 'Terrinallum South' 833 Darlington – Carranballac Rd, Darlington Vic, 3271. Prepared by Brett Lane & Ass)