Birregurra–Ombersley Poultry Farm:

Preliminary Documentation: Matters of National Environmental Significance Management Plan (EPBC 2025/10098)

Prepared for ProTen Pty Ltd

Final Report

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Biosis staff involved in this project were:

- [redacted]
- [redacted]
- [redacted]

Contents

List of tables

List of figures

Declaration of accuracy

Birregurra-Ombersley Poultry Farm and associated infrastructure upgrades (EPBC 2025/10098)

In making this declaration, I am aware that section 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the *Environment Protection and Biodiversity Conservation Regulations 2000* (Cth). The offence is punishable on conviction by imprisonment or a fine, or both. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

[redacted]

[redacted]

ProTen

Date: _____/_____/_____

Executive Summary

The project

ProTen Pty Ltd (the proponent) proposes to develop the Birregurra–Ombersley Poultry Farm at 320 Mooleric Road, Ombersley, Victoria, together with associated access and service infrastructure.

The proposed action comprises three components:

- Upgrade of an existing unnamed government road to provide all-weather access to the site and the installation of power poles along the road reserve; and
- Construction of a water pipeline connecting the poultry farm to the Birregurra township; and
- Development and operation of a free-range broiler poultry facility.

The poultry farm will be developed on approximately 125 hectares of privately owned agricultural land. The facility will operate as a free-range special class Broiler Farm with a maximum capacity of 1,560,000 birds, and will include poultry sheds, ancillary buildings, internal access roads and hardstand areas.

The road upgrade will be constructed to Colac Otway Shire design standards and will provide the only permanent access to the currently landlocked site. The water pipeline will be installed using a combination of open trenching and directional boring, with trenchless methods used in environmentally sensitive areas to avoid impacts to native vegetation and threatened fauna habitat.

Development will occur in stages, commencing with the road upgrade and power pole installation, followed by the pipeline installation and poultry farm construction. The proposed action was referred under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), with potential impacts to Matters of National Environmental Significance confined to the road upgrade and power poles component. The Department of Climate Change, Energy, the Environment and Water (DCCEEW) determined the proposed action is Controlled Action, requiring further information. This Preliminary Documentation forms the basis of assessment for the proposed action.

Potential impacts

The key impacts to MNES were identified during the flora and fauna assessments (Biosis 2023, Biosis 2024a) and targeted surveys for Striped Legless Lizard *Delma impar (*SLL) (Biosis 2024b). Potential impacts to MNES include:

- Removal of identified habitat for SLL for the upgrade of the existing unnamed government road and the installation of power poles.
  - Reduction in the area of occupancy of the population.
  - May disrupt breeding of the individuals utilising the area.
- Indirect impacts to Growling Grass Frog *Litoria raniformis* (GGF) individuals and habitat through the construction of the water pipeline.
- Impacts to Birregurra Creek through the construction of the water pipeline, and therefore potential impacts to River Swamp Wallaby-grass *Amphibromus fluitans* and Yarra Pigmy Perch *Nannoperca obscura*, which are associated with the Creek and could be present.

- Indirect impacts to patches of the Threatened Ecological Community, Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowlands Plains present on the farm site. The patches provide potential habitat for GGF, Matted Flax-lily *Dianella amoena* and Clover Glycine *Glycine latrobeana*.

This MNES management plan considers the following Matters of National Environmental Significance:

- SLL is listed as Vulnerable under the EPBC Act.
- GFF is listed as Vulnerable under the EPBC Act.
- MNES associated with Birregurra Creek including threatened flora and fauna.
- Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowlands Plains (Critically Endangered) is an ecological community that is listed as Critically Endangered under the EPBC Act.

Background information on these MNES can be found in section 2 of this preliminary documentation. Mitigation measures and protocols to manage these MNES are covered in sections 4 and 8 of this report.

Key management actions

The key management actions are summarised in Table 1 must be implemented by ProTen to minimise potential impacts to MNES. A more comprehensive operational plan is detailed in section 5 of this report.

Table 1 Summary of management actions for Birregurra-Ombersley Poultry Farm

Management action	Requirements	Notes
Pre-Construction Phase		
No-go areas, fencing and bunting	• Separating any works areas and MNES habitat. • Established prior to works. • Regularly checked and maintained.	• Reduce impacts on MNES. • Prevent threatened species entering works area.
Construction staff induction	• Locations of MNES habitat and values. • Fauna management actions. • Threatened species identification and procedure.	• Initial induction for staff. • Covered during daily pre-starts. • Prior to fauna salvage.
Indirect effects controls	• Sediment fencing. • Refuelling and chemicals procedures.	• Contain contaminants to works area.
Engage ecologist	• Pre-clearance habitat survey of vegetation and works areas. • Initial excavator scrape for SLL for the all-weather road. • As required based on ecologist advice.	• Pre-clearance checks to occur within three days of vegetation clearing. • Excavator scrape must occur prior to other works to clear area of SLL habitat.
Construction Phase		
Habitat retention	• No impacts to vegetation or habitat outside of the works footprint. • Salvage of logs from vegetation removal. • Minimise footprint when intersecting habitat.	• As advised by this management plan and the ecologist as required.

Management action	Requirements	Notes
	• Minimise removal of embedded rock and refuge habitat.	
Maintenance of No-go areas	• No vehicles or personnel to enter No-go areas. • No soil disturbance to occur within No-go areas. • No storage of materials, equipment, vehicles or waste outside of designated works zones. • Regular inspections fencing and bunting. • Repairs to fencing as necessary.	• No construction machinery or plant to enter outside marked impact area. • Fencing and bunting to remain in place for works period.
Daily checks of works areas and trenches	• All works areas, trenches and pits. • Beginning and end of daily works.	• Cease works in the works area and engage ecologist if fauna are encountered in trenches or confined work areas. Permits are required to handle all fauna.
Unexpected threatened species	• Stop works when encountering all threatened species. • Follow the threatened species procedure.	• Immediately seek advice from qualified ecologist.
Post-Construction Phase		
Post-Construction Inspection	• Inspection of the construction site once all works are completed. • Identification of any disturbed areas of MNES habitat.	• Ensure no unintentional impacts have occurred to MNES.
Removal of temporary structures	• Removal of all temporary structures.	• Restore construction areas to pre-works condition.
Revegetation of habitat	• Restore disturbed SLL habitat. • Identified disturbed areas of MNES habitat to be restored, including re-establishment of locally indigenous grass species known to be utilised by SLL.	• Restore construction areas to pre-works condition, as far as practicable. • No significant impacts on MNES.
Operational Phase		
Road use and access control	• Restrict all vehicle movements to the constructed road surface. • Prevent access, widening or encroachment into adjacent SLL habitat. • Maintain signage, barriers, or fencing where required to reinforce access controls.	• Ensure no additional impacts to SLL habitat.
Road maintenance and drainage	• Maintain road surface and drainage to prevent erosion or runoff into SLL habitat. • Undertake routine inspections following heavy rainfall. • Implement remedial works promptly where erosion or degradation is identified.	• Implement drainage modifications if erosion persists.

Management action	Requirements	Notes
Vegetation and verge management	• Manage roadside vegetation to maintain sightlines and access without degrading SLL habitat. • Avoid mowing, slashing, or works outside the defined road verge. • Rehabilitate any areas of inadvertent disturbance.	• Adjust mowing methods as required.
Monitoring of SLL habitat adjacent to road	• Periodically inspect retained SLL habitat adjacent to the road. • Identify any signs of degradation attributable to road use. • Engage an ecologist to advise on additional protection or rehabilitation measures if impacts are detected.	• Ensure records are maintained of routine inspections of SLL habitat.

Residual significant impacts

The assessments undertaken to date conclude that the scale and intensity of potential impacts to MNES do not constitute a significant impact considering the broader context of the project area and the availability of surrounding suitable habitat. However, following ongoing consultation with DCCEEW, it is understood that DCCEEW's position is that the permanent removal of 1.255 hectares of SLL habitat constitutes a residual significant impact to the species under the referral guidelines (DSEWPC 2011a) and that offsets are therefore required. Accordingly, the preparation of an offset strategy has been pursued and will be implemented as required. Further information on the proposed offset strategy is provided in section 7.

1. Project Description

1.1 Location

The project area is located approximately 7 kilometres north of Birregurra and approximately 20 kilometres north-east of Colac, within the Colac Otway Shire in south-western Victoria. The proposed poultry farm is located at 320 Mooleric Road, Ombersley, with associated infrastructure extending along an unnamed government road reserve and a proposed water pipeline corridor. The poultry farm site is situated on private freehold land, while the road reserve and portions of the pipeline traverse Crown land. The land is zoned Farming Zone (FZ), with the pipeline also intersecting land zoned Transport Zone (TRZ2) under the Colac Otway Planning Scheme.

The project area is within the:

- Victorian Volcanic Plain Bioregion
- Barwon River Basin
- Management area of the Corangamite Catchment Management Authority
- Traditional lands of the Eastern Maar

The surrounding landscape is dominated by agricultural land uses, primarily grazing and cropping, with a commercial quarry located immediately west of the site. Much of the project area has been highly modified through historical clearing and ongoing agricultural activities and supports predominantly introduced vegetation of generally low ecological condition. Nevertheless, sections of the road reserve and nearby waterways provide habitat for threatened fauna species, contributing to the ecological values of the broader landscape.

The project area includes the proposed poultry farm comprising of the following six land parcels, located at 320 Mooleric Road Birregurra.

- Lot 1 TP247757
- Lot 3 TP372519
- Lot 4 TP247757
- Lot 4 TP372519
- Lot 6 TP247757X
- Lot 7 TP247757X

1.2 Landscape context

The project area is in a rural farming area and most of the surrounding landscape has been cleared for either grazing or cropping. The project area is not located close to any large conservation reserves. It is approximately 20 kilometres from Lake Colac and Lake Murdeduke, and a similar distance to the north of the forested area of the Otway Ranges.

Some neighbouring properties and road reserves support remnant grasslands or wetland vegetation, including the property to the north of the proposed all weather road and poultry farm, which is a wind farm that is managed for grazing.

The property to the south of the poultry farm supports a large, low-lying area that contains Plains Grassy Wetland vegetation, and two sections of this wetland extend short distances into the project area, near the southern boundary (see Figure 1). The Birregurra Creek passes through the project area, crossing over the proposed water pipeline (beneath Birregurra Road) providing connectivity between the project area and the Barwon River.

1.3 Project background

Biosis Pty Ltd was commissioned by ProTen to provide an MNES Management Plan for the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) Referral Request for Further Information (RFI) for the Birregurra–Ombersley Poultry Farm and associated infrastructure upgrades (EPBC 2025/10098).

Two flora and fauna assessments have been undertaken for this project, that being for the proposed poultry farm (Biosis 2023) and for the associated proposed water pipeline and upgrade of the existing unnamed government road to enable access to the farm site (Biosis 2024a). The referral under Part 7 of the EPBC Act was prepared following completion of targeted surveys for SLL (Biosis 2024b), undertaken on the unnamed government road. The project which covered the development of the poultry farm and the installation of the pipeline was referred. The referral was determined to be a controlled action on 20 November 2025.

An RFI was received from DCCEEW on 3 December 2025 outlining the scope of Preliminary Documentation required for further assessment of the proposed action. This MNES Management Plan has been updated to address all matters identified in the RFI and is submitted as the Preliminary Documentation for the purpose of the assessment.

On 8 December 2025, a request to vary the proposed action was submitted to DCCEEW to include the installation of the power poles along the road reserve. The variation request was initially based on a 9m x 9m construction impact area for the power poles. Following revisions to the construction methodology, the extent of temporary disturbance has been modified, with pole installation now resulting in a total temporary disturbance area of 0.01 hectares.

A planning application for the project was submitted to Colac Otway Shire Council under the *Planning and Environment Act 1987.* The Council issued a Notice of Decision on 31 July 2024. An application for review was lodged with the Victorian Civil Administrative Tribunal (VCAT) by two objectors who had concerns relating to odour, noise, traffic, native vegetation and groundwater. Formal proceedings occurred throughout 2024 and 2025. The tribunal upheld the decisions by Council and a permit was issued.

1.4 Project description

The proposed action involves the development and operation of a free-range broiler poultry facility, the upgrade of an existing unnamed government road to an all-weather standard, the installation of power poles, and construction of a water pipeline connecting the site to the Birregurra township water supply. The poultry farm will operate as a free-range special class broiler farm with a maximum capacity of 1,560,000 birds. Further details of the economic benefits associated with the project area provided in Appendix 3.

Construction and operational activities associated with the proposed action will occur across approximately 125 hectares of privately owned agricultural land. The access road, power poles, and pipeline components will be located within public road reserves. The project area and values are shown in Figure 1.

The proposed action will result in direct impacts associated with the upgrade of the unnamed road reserve and power pole installation, including impacts to scattered native vegetation and habitat for threatened fauna species. Impacts associated with the poultry farm site and water pipeline have been designed to avoid native vegetation and sensitive habitats where practicable. Directional drilling will be used in environmentally sensitive areas to avoid impacts to waterways, wetlands and threatened species habitat.

Several design iterations have been undertaken to avoid and minimise impacts to ecological values. With implementation of the proposed mitigation measures, no additional impacts are anticipated beyond those assessed.

The proposed activities include:

- Upgrade of the unnamed government road, including earthworks, pavement construction, drainage works and post-construction revegetation to provide all-weather access to the site.
- Installation of eight power poles along the road reserve including individual boring.
- Construction and operation of the poultry farm, including poultry sheds, ancillary buildings, internal access roads, hardstand areas, utilities and manager accommodation.
- Installation of a water pipeline, using a combination of open trenching and directional boring to connect the poultry farm to the Birregurra township water supply.

1.4.1 Construction activities

Construction activities to facilitate the proposed action will include four main areas of works:

- Civil works associated with the all-weather road upgrade.
  - Establishment of site access from Mooleric Road and fencing of sensitive vegetation and retained habitat with a buffer prior to works.
  - Stockpile and laydown areas will be established within the poultry farm area prior to the commencement of construction.
  - Minor clearing within defined boundaries.
  - Cut and fill earthworks to prepare the road subgrade.
  - Installation of drainage infrastructure, including open drains, culverts, rock check dams, and sediment controls.
  - Construction of road pavement layers, including quarry rubble base, sub-base gravel, and wearing course.
  - Formation of a Council-standard crossover and realigned farm entry to avoid existing tree row adjoining the quarry.
  - Post-construction inspection, clean-up, and demobilisation, followed by revegetation of disturbed verges.
- Power pole installation.

  - Temporary fencing established around pole installation footprint and areas of native vegetation.
  - Boring of individual poles holes with soil carefully removed and deposited around the pole and either spread to the south or removed from the site. This method will facilitate the rehabilitation of the area following installation.
  - Power pole marshalling and assembly undertaken within a designated laydown area inside the poultry farm area to avoid works in the road reserve and near avoidance zones.
- Poultry farm construction works within the private landholding, including:
  - Installation of temporary fencing to delineate construction areas and protect no-go avoidance areas.
  - Earthworks for poultry sheds, managers' dwellings, hardstand areas, internal access roads.
  - Construction of poultry sheds, including steel framing, cladding, roofing, ventilation systems, and internal fit-out.
  - Early construction of one shed per site to be used as a secure construction store for weather-sensitive materials and packaging control.
  - Establishment of designated topsoil stockpile areas located outside of flood-prone and sensitive areas (see Figure 2).
  - Establishment of a shared rock stockpile, avoiding interaction with sensitive environmental zones. (see Figure 2).
  - Progressive stabilisation, drainage, erosion and sediment controls during works.
- Pipeline installation and associated service connections.
  - Trenching along approved pipeline alignment, with excavation limited to the defined footprint.
  - Directional drilling will occur in areas of sensitivity.
  - Progressive installation of pipeline infrastructure, followed by backfilling and surface reinstatement.
  - Daily inspection of open trenches for fauna, with salvage and relocation undertaken if required.
  - Stockpiling of excavated material only in designated on-site areas.
  - Implementation of erosion, sediment, and water management controls during trenching and reinstatement.

An indicative construction and operation schedule is provided in Table 2, with plans illustrating the nature and extent of works included in Figure 2.

Table 2 Project timeline

Stage	Timeline
Pre-construction	4 May 2026 – 5 June 2026
Construction	8 June 2026 – 9 June 2028

Stage	Timeline
Post-construction	12 June 2028 – 21 July 2028
Operation	50 years

1.4.2 Operational activities

The operation of the poultry farm will involve routine activities including daily staff access, shed management and monitoring, feed delivery, and litter removal. The project will generate approximately 5,546 one-way vehicle movements per year, equating to an average of 15 vehicle movements per day. This will vary based on production cycle and activity. Vehicle movements will comprise a mix of heavy vehicles and light vehicle associated with staff and maintenance, with all movements confined to the upgraded access road and managed to avoid disturbance to adjacent habitat.

1.5 Ecological surveys

Targeted and general ecological surveys have been undertaken to inform the assessment of potential impacts associated with the proposed action. A Flora and Fauna Assessment (FFA) was completed for the poultry farm site in May 2023 (Biosis 2023), supported by database reviews, habitat mapping, and field investigations consistent with Victorian and Commonwealth guidance. Subsequent assessments were undertaken for the associated access road and water pipeline corridors and pumping station, including updated flora and fauna surveys in July and September 2023 (Biosis 2024a). Targeted surveys for Striped Legless Lizard (SLL) *Delma impar*, were undertaken between October and December 2023 in suitable habitat within the unnamed road reserve. Survey effort included the establishment and monitoring of artificial shelter transects over multiple visits during the species' recognised activity period. The surveys also considered habitat suitability for other EPBC Act-listed species, including GGF, Gang-gang Cockatoo, and migratory and wide-ranging fauna.

Overall, the survey effort and timing are considered appropriate and adequate to characterise the presence, absence, and likelihood of occurrence of key protected matters potentially affected by the proposed action. Surveys were undertaken during suitable seasonal windows and applied methods consistent with relevant Commonwealth policy, guidance, and significant impact assessment criteria.

2. MNES within the project area

Two flora and fauna assessments have been undertaken for the project, that being for the proposed poultry farm (Biosis 2023) and for the associated proposed water pipeline and upgrade of the existing unnamed government road to enable access to the farm site (Biosis 2024a). In addition, targeted surveys for SLL (Biosis 2024b), were undertaken on the unnamed government road. These technical assessments were included with the referral documentation submitted in January 2025.

The ecological assessment determined that the project area has potential to support the following three ecological values, and as such these are the focus of the following assessment and management plan:

- SLL is listed as Vulnerable under the EPBC Act,
- GGF is listed as Vulnerable under the EPBC Act,
- Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowlands Plains (Critically Endangered) is an ecological community that is listed as Critically Endangered under the EPBC Act.

Background information for these MNES is outlined in the section below. Mitigation measures to protect these MNES are outlined in section 4 and specific protocols for their salvage and handling are outlined in section 8.

2.1 Striped Legless Lizard

2.1.1 Species description

The SLL is a long, thin-bodied lizard of the Pygopodidae family. SLL, like all members of the Pygopodidae, lacks forelimbs and has reduced or vestigial hind limbs (NSW NPWS 1999). SLL reach a maximum length of approximately 300 millimetres with the tail contributing over half of this length. The snout to vent length is approximately 120 millimetres. SLL exhibit considerable variation in colour patterning ranging from pale to grey-brown on the dorsal surface to pale cream on the ventral surface. A series of stripes run the length of the body and become diagonal bands on the tale. Some adults and most juveniles are pale brown with a dark head and lack the dorsal patterning more regularly associated with this species (NSW NPWS 1999). SLL are often confused with snakes but can be differentiated by the presence of ear openings, an undivided (entire) tongue and the high tail to body-length ratio (NSW NPWS 1999). The species is listed as vulnerable under the EPBC Act.

SLL have sometimes been thought to exclusively inhabit native grasslands dominated by *Austrostipa* and *Themeda* species in south-eastern Australia, ranging from the Australian Capital Territory in the north-east to just over the South Australia border in the south-west (DSEWPC 2011b). However, further studies indicate the species also utilises introduced pasture grass and inhabits cleared woodland areas (NSW NPWS 1999). This more general habitat specification indicates that a dense grassland structure along with suitable soil type, is the principal habitat requirement as opposed to a specific composition of native grass species (Harley et al. 2005).

Major threats to the SLL include loss of grassland habitat due to urban expansion, particularly on Melbourne's western fringe and habitat modification from agricultural development across the species range (NSW NPWS 1999). Other threats include inappropriate fire regimes and possibly predation by native and introduced predators (NSW NPWS 1999).

2.1.2 Presence within the project area

Four SLL were recorded within the project area during targeted surveys undertaken in 2024 and these were confirmed to be at least two separate individuals. Key SLL habitat within the project area is mapped in Figure 1 and amounts to a total of 2.43 hectares.

The unnamed government road where SLL were recorded supports several small patches of Plains Grassy Wetland EVC 125, and native vegetation is scattered throughout a largely disturbed area that supports predominantly introduced vegetation such as Toowoomba Canary-grass *Phalaris aquatica*. The soils are black, cracking clays with some surface and embedded rocks. Tussock grasses (such as Common Tussock-grass *Poa labillardierei*) are sparse and appear to have been heavily grazed throughout the road reserve. Although SLL typically prefer native grasslands, the findings are consistent with the current understanding of the species requirements which can include sites with exotic grasses that are used for breeding and foraging by the species (Threatened Species Scientific Committee 2016, Hartley et al. 2005). The surface rocks within the road reserve may be utilised by SLL that could move in from suitable habitat to the north, which supports moderate quality habitat with large tussock grasses, surface rocks and inter-tussock spaces.

The land to the immediate north of the road reserve is occupied by Mount Gellibrand Wind Farm which underwent a Flora and Fauna assessment before development (BL&A 2005). BL&A (2005) determined there was marginal habitat for SLL throughout the wind farm site with the exception of the high-quality grasslands in the southern part of the site, which appears to correspond to the suitable SLL habitat directly north of the project area. That property has not been accessible and survey for SLL has not been feasible. However, during Biosis' ecological assessments of the project area, observations confirmed that habitat immediately north of the road reserve within the adjacent wind farm exhibits characteristics consistent with SLL habitat. Review of aerial imagery (see photo 1) indicates that this habitat is contiguous further to the north, beyond 100 metres of the project area (see Figure 1) over a broad area of that one property of at least 600 hectares. In addition, the project area is located within the Habitat Importance Map (HIM) and Habitat Distribution Model (HDM) areas mapped by the Department of Energy, Environment and Climate Action (DEECA). In addition, there are records of SLL from 2022 approximately 2.5 kilometres west of the project area. As such Biosis is of the opinion that the SLL habitat in the road reserve forms the southern most extent of this larger habitat area.

Photo 1: Aerial imagery of the Mount Gellibrand Wind Farm immediately north of the project area (Source: NearMap 2025)

Photo 2: Habitat within the road reserve

Photo 3: Habitat immediately north of the project area

The area immediately south of the road reserve is occupied by an operational quarry that is not habitat suitable for SLL (Biosis 2014). The remaining land to the south of the road reserve is used for livestock grazing and the soil is highly disturbed. This land has been assessed for the proposed Ombersley Poultry Farm and is considered not suitable habitat for SLL in its current state (Biosis 2023).

2.2 Growling Grass Frog

2.2.1 Species description

The GGF is a species of national conservation significance. It is listed as vulnerable under the EPBC Act and as a vulnerable under Victoria's *Flora and Fauna Guarantee Act 1988*. Prior to European settlement, GGF were widely distributed across south-eastern Australia, including Tasmania. However, over the past three decades, the species has declined markedly across much of this former range. This is particularly evident in south and central Victoria where populations have experienced widespread declines and local extinctions (DEWHA 2009a).

Factors that have contributed to the decline of GGF across its range include habitat loss, the fragmentation and degradation of habitat, predation by introduced species (e.g. Eastern Gambusia *Gambusia holbrooki*), infection by the amphibian chytrid fungus *Batrachochytrium dendrobatidis*, salinisation, pollution of waterbodies and waterways (e.g. fertilisers, pesticides and toxicants), and impacts from climate change

(including direct and indirect/cumulative impacts) (Heard et al. 2010). Populations are threatened by urban and industrial development, particularly throughout Melbourne's urban growth areas (DSE 2012, Heard & Robertson 2022).

Research on the species population structure and spatial occurrence emphasised the importance of landscape scale connectivity for the species (Heard & Scroggie 2009). Across most of Victoria, GGF occur in metapopulations made up of semi-discrete populations inhabiting suitable waterbodies that are connected principally by streams and drainage lines that permit GGF to disperse between waterbodies. Metapopulations exhibit changes over time and can go extinct and be recolonised from connected populations (DEWHA 2009b, Heard & Scroggie 2009).

The species relies on permanent or semi-permanent still or slow flowing waterbodies that typically support adequate emergent, submerged and floating vegetation. Open and partially rocky areas are often preferred for basking, and open grassland habitat surrounding waterbodies is required for foraging and dispersal. Individuals hibernate (overwinter) beneath thick vegetation, logs, rocks and other ground debris, and increase activity during warmer months as breeding occurs in spring and summer (DSE 2012).

2.2.2 Presence within the project area

Potential GGF habitat exists within the previous pipeline footprint beginning south of the Princess Highway and ending at Birregurra Creek (Figure 1). GGF were not detected in the project area during the flora and fauna assessment (Biosis 2024a), however several recent local records exist in the area, and targeted surveys were not conducted to demonstrate absence. The habitat patches are joined by a contiguous movement corridor within the previous pipeline footprint. The revised footprint avoids this area mitigating potential impacts to GGF. Birregurra Creek contains seasonally suitable habitat.

2.3 Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains (Critically Endangered)

Two patches of this EPBC Act listed ecological community exist within the south-eastern and in the southern parts of the proposed poultry facility (Figure 1.6). These areas have been excluded from the disturbance footprint. This threatened community provides important potential habitat for several EPBC Act listed species.

EPBC Act listed species that are most likely to occur within the listed ecological community are:

- Growling Grass Frog *Litoria raniformis*
- Matted Flax-lily *Dianella amoena*
- Clover Glycine *Glycine latrobeana*

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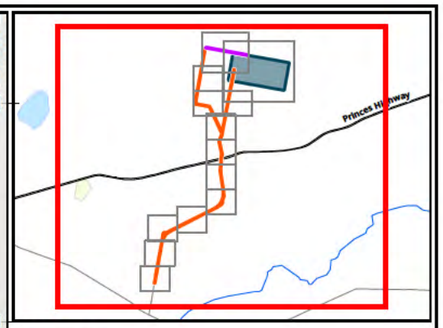
742000 E
743000 E
744000 E
745000 E
746000 E
747000 E
748000 E
749000 E
750000 E
5761000 N
5760000 N
5759000 N
5758000 N
5757000 N
5756000 N
5755000 N
5754000 N

Figure 1.1
Figure 1.2
Figure 1.3
Figure 1.4
Figure 1.5
Figure 1.6
Figure 1.7
Figure 1.8
Figure 1.9
Figure 1.10
Figure 1.11
Figure 1.12
Figure 1.13

Princes Highway
Birregurra Road
Warncoort - Birregurra Road
Cape Otway Road
Ricketts Marsh
Birregurra Creek
Barwon River
Atkin Creek



Legend

Project area

- Poultry farm
- Road development
- Pipeline

Figure 1.0 Key features of the proposed action: overview

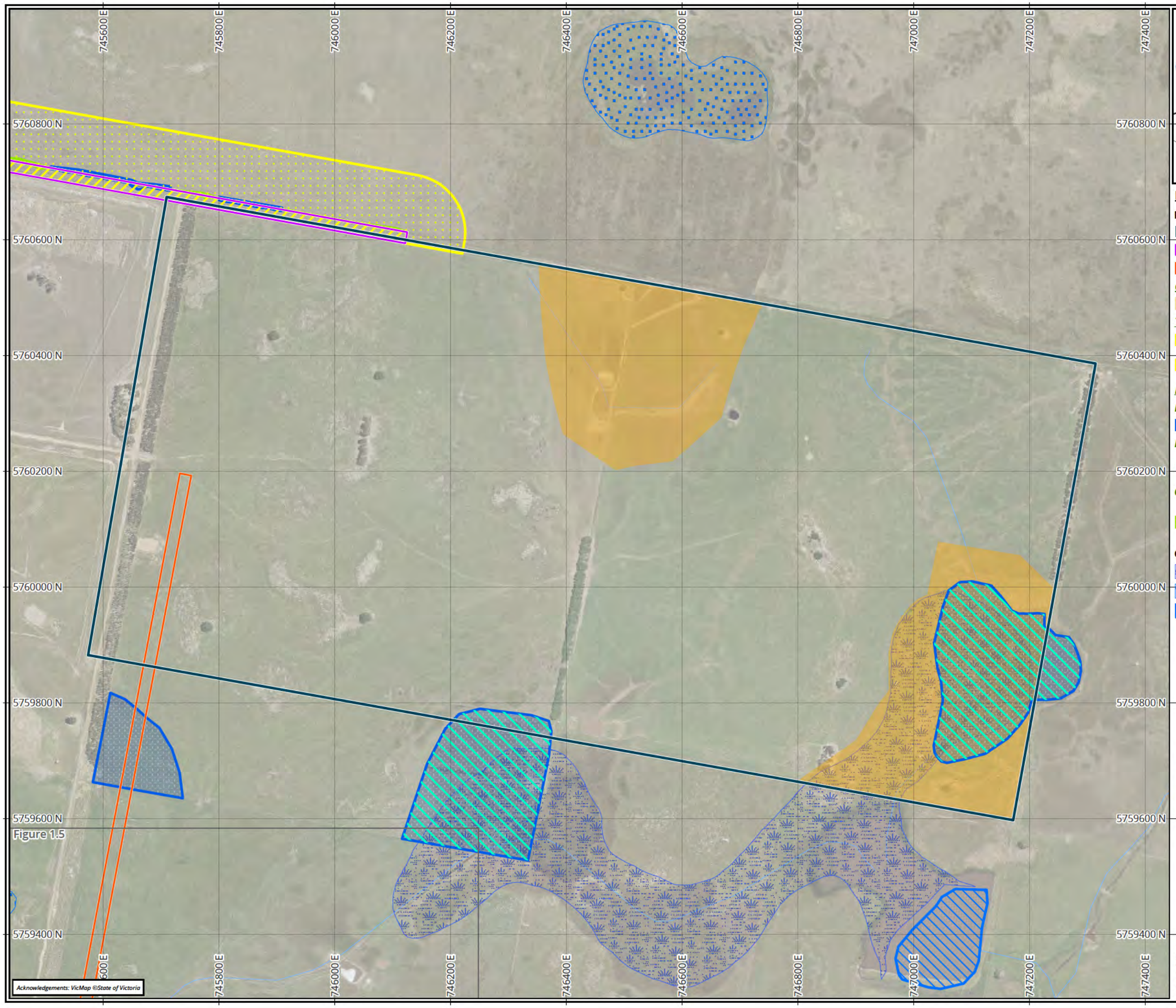
0 210 420 630 840 1,050
Metres

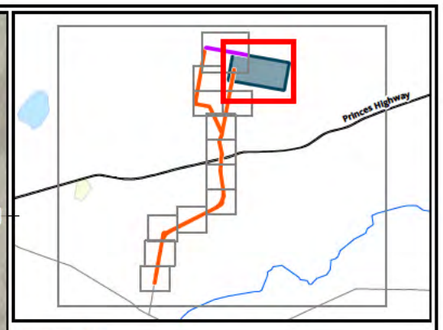
N

Scale: 1:28,000 @ A3
Coordinate System: GDA2020 MGA Zone 54

biosis
APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
Layout: 43957_F1_Key_features
Location: P:\43900s\43957\Mapping\
43957_BirregurraPoultryFarm_EPBC_Var.aprx





Legend

Project area

- Poultry farm
- Road development
- Pipeline

Cultural heritage

- Area of cultural heritage sensitivity

Threatened fauna habitat

- Striped Legless Lizard
- Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

Ecological vegetation classes (EVCs)

- 125 Plains Grassy Wetland

EPBC listed threatened ecological communities

- Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains

Other native vegetation

- Scattered native vegetation including Basalt Poa. However, not considered native vegetation in the Guidelines.

Current wetlands (DEECA)

- 2 - Freshwater meadow
- 3 - Shallow freshwater marsh
- 5 - Permanent open freshwater

Figure 1.1 Key features of the proposed action: poultry farm

0 40 80 120 160 200

Metres

N

Scale: 1:6,000 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
Layout: 43957_F1_Key_features
Location: P:\43900s\43957\Mapping\
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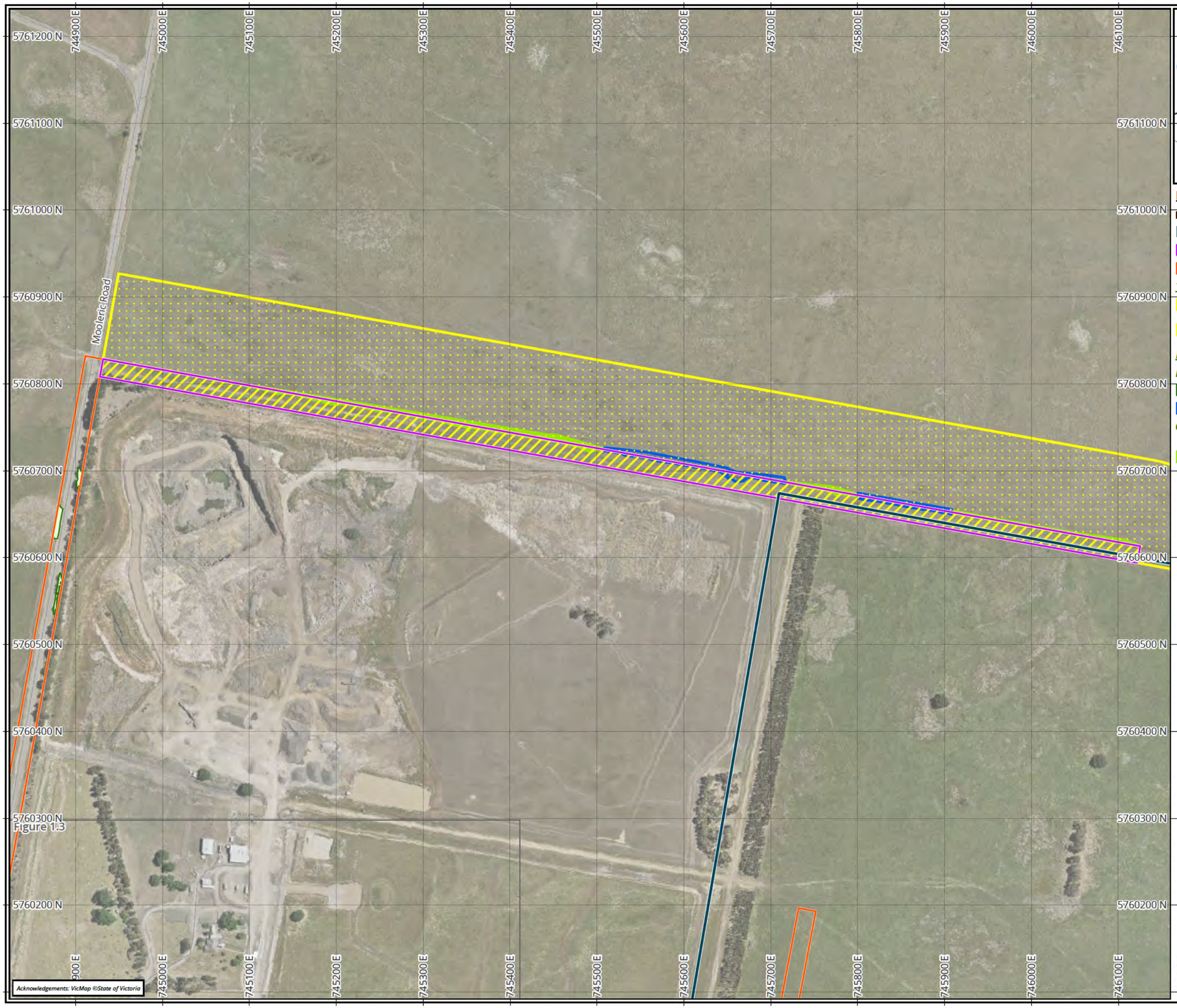

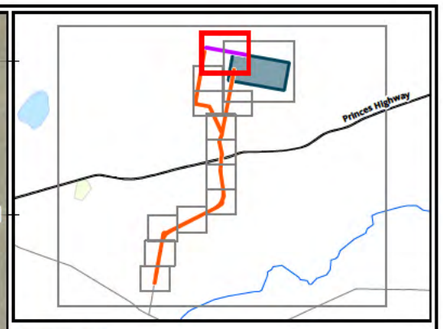

Legend

Project area

- Poultry farm
- Road development
- Pipeline

Threatened fauna habitat

- Striped Legless Lizard
- Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

Ecological vegetation classes (EVCs)

- 55_61 Plains Grassy Woodland
- 125 Plains Grassy Wetland

Other native vegetation

- Scattered native vegetation including Basalt Poa. However, not considered native vegetation in the Guidelines.

Figure 1.2 Key features of the proposed action: road development

0 30 60 90 120 150

Metres

N

Scale: 1:4,000 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
Layout: 43957_F1_Key_features
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43957_BirregurraPoultryFarm_EPBC_Var.aprx

744600 E
744700 E
744800 E
744900 E
745000 E
745100 E
745200 E
745300 E
745400 E
5760200 N
5760100 N
5760000 N
5759900 N
5759800 N
5759700 N
Mooleric Road
Princes Highway

Legend

Project area

Pipeline

Native vegetation

Ecological vegetation classes (EVCs)

55_61 Plains Grassy Woodland

Figure 1.3 Key features of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

N

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
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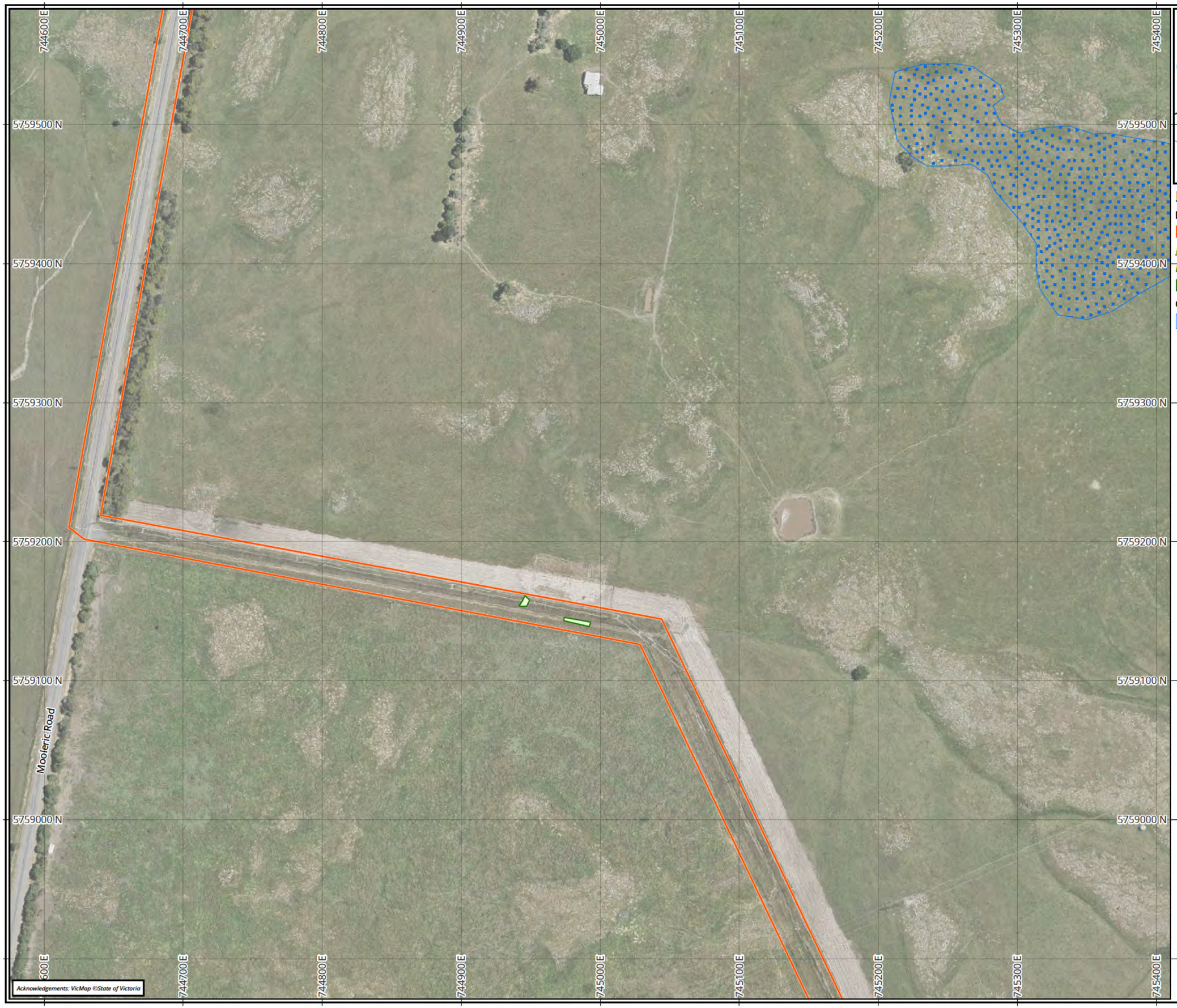

Legend

Project area

Pipeline

Native vegetation

Ecological vegetation classes (EVCs)

55_61 Plains Grassy Woodland

Current wetlands (DEECA)

3 - Shallow freshwater marsh

Figure 1.4 Key features of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

N

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
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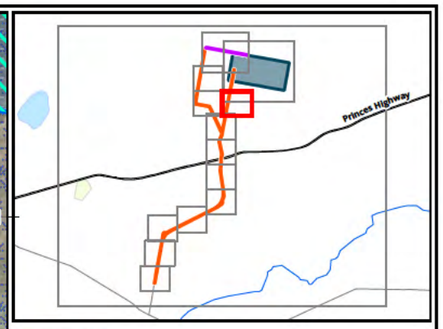

Legend

Project area

Pipeline

Native vegetation

Ecological vegetation classes (EVCs)

125 Plains Grassy Wetland

EPBC listed threatened ecological communities

Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains

Current wetlands (DEECA)

2 - Freshwater meadow

3 - Shallow freshwater marsh

Figure 1.5 Key features of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

N

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
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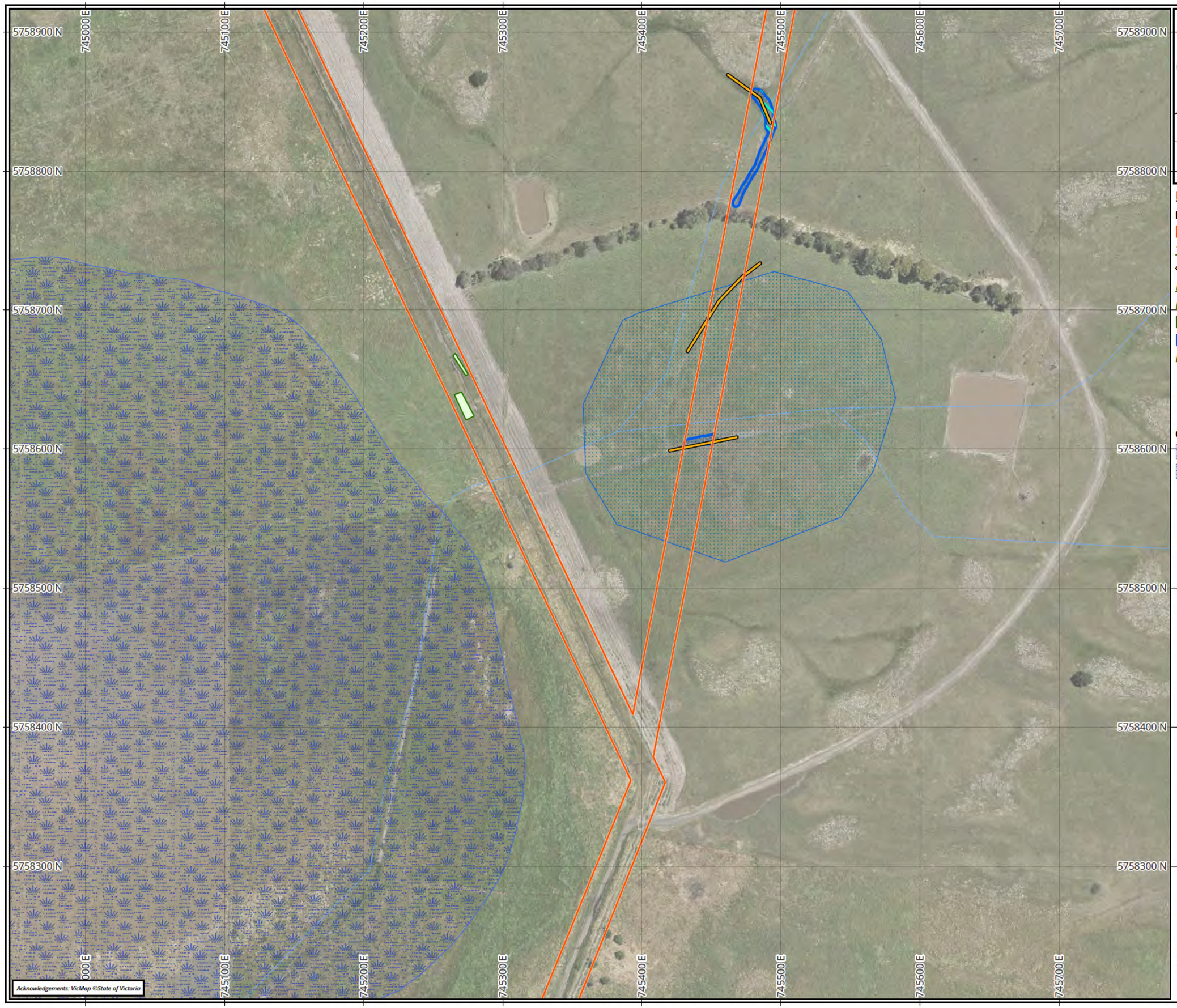

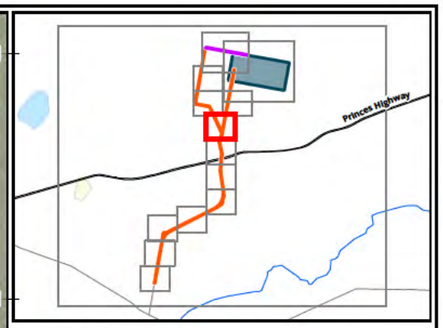

Legend

Project area

Pipeline

Threatened fauna habitat

Burrowing Crayfish burrows

Native vegetation

Ecological vegetation classes (EVCs)

55_61 Plains Grassy Woodland

125 Plains Grassy Wetland

EPBC listed threatened ecological communities

Potential Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains (key diagnostic species present, but wetland too small to qualify as community)

Current wetlands (DEECA)

2 - Freshwater meadow

99 - No Category

Figure 1.6 Key features of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

N

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
Layout: 43957_F1_Key_features
Location: P:\43900s\43957\Mapping\
43957_BirregurraPoultryFarm_EPBC_Var.aprx

Figure 1.7 Key features of the proposed action: pipeline detail

Legend

Project area

Pipeline

Threatened fauna habitat

Growling Grass Frog

Growling Grass Frog movement corridor

Native vegetation

Ecological vegetation classes (EVCs)

647 Plains Sedgy Wetland

Current wetlands (DEECA)

6 - Semi-permanent saline

99 - No Category

Figure 1.8 Key features of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

N

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
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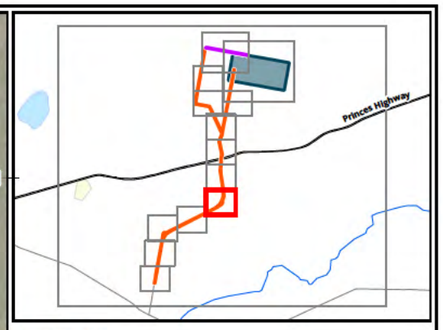

Legend

Project area

Pipeline

Threatened fauna habitat

Growling Grass Frog movement corridor

Native vegetation

Ecological vegetation classes (EVCs)

175 Grassy Woodland

Current wetlands (DEECA)

6 - Semi-permanent saline

99 - No Category

Figure 1.9 Key features of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

N

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
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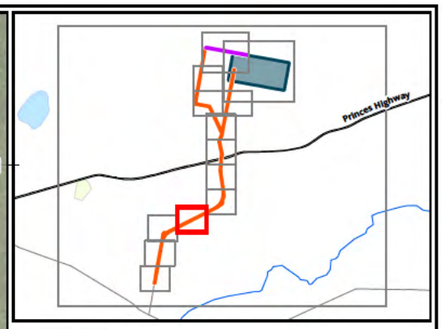

Legend

Project area

Pipeline

Figure 1.10 Key features of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

N

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
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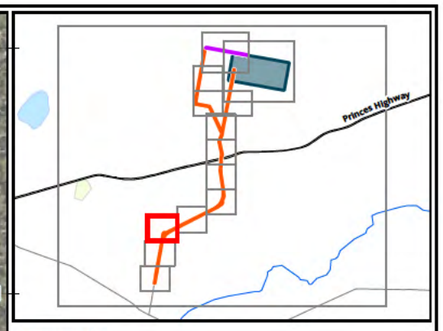

Legend

Project area

Pipeline

Figure 1.11 Key features of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

N

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
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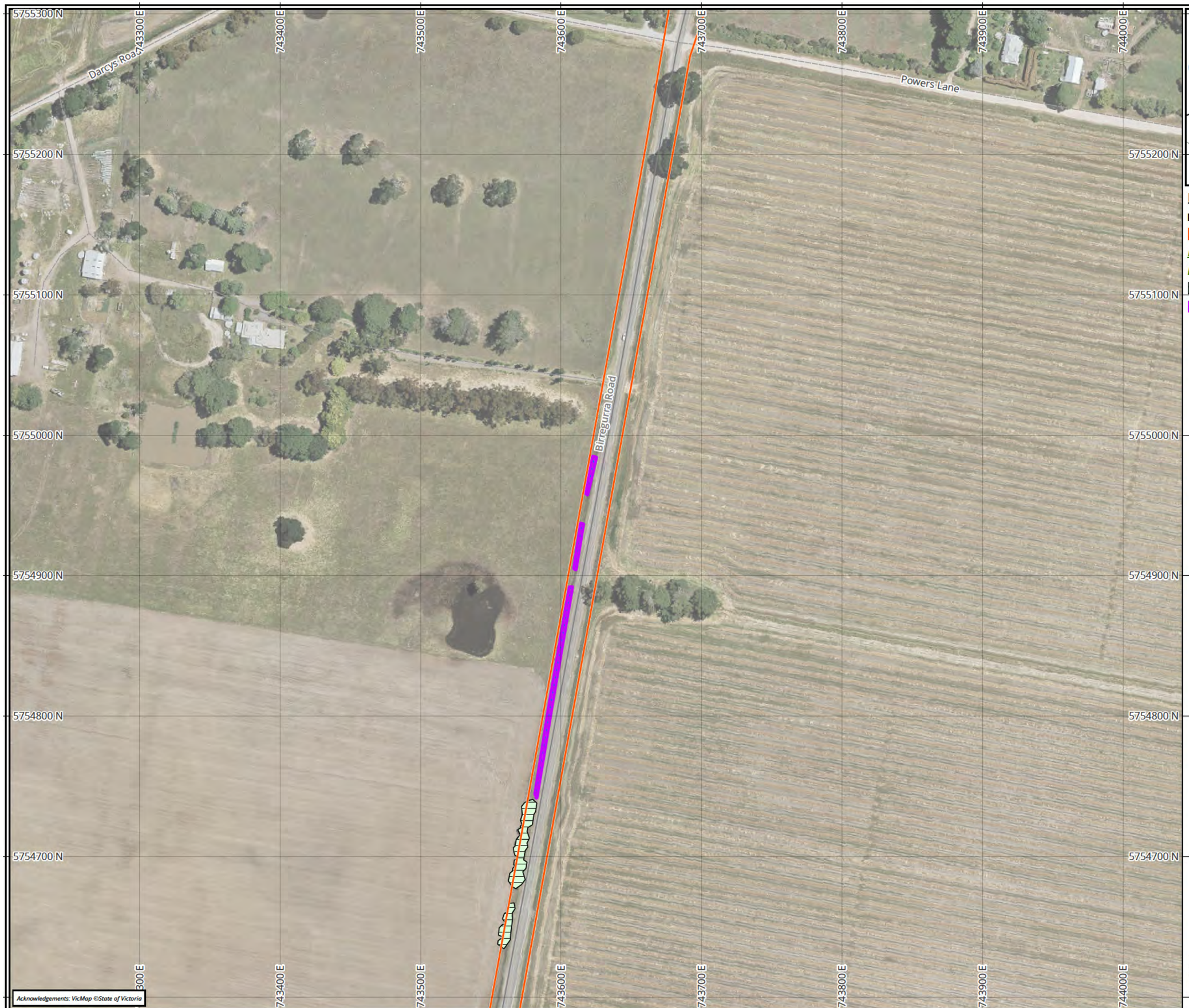


Legend

Project area

Pipeline

Native vegetation

Ecological vegetation classes (EVCs)

175 Grassy Woodland

647 Plains Sedgy Wetland

Figure 1.12 Key features of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

N

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
Layout: 43957_F1_Key_features
Location: P:\43900s\43957\Mapping\
43957_BirregurraPoultryFarm_EPBC_Var.aprx

Legend

Project area

Pipeline

Native vegetation

Ecological vegetation classes (EVCs)

175 Grassy Woodland

647 Plains Sedgy Wetland

Figure 1.13 Key features of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

N

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 19 December 2025,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
Layout: 43957_F1_Key_features
Location: P:\43900s\43957\Mapping\
43957_BirregurraPoultryFarm_EPBC_Var.aprx

3. Potential impacts to MNES

The key impacts to MNES were identified during the flora and fauna assessments (Biosis 2023, Biosis 2024a) and the targeted surveys for SLL (Biosis 2024b). They have been discussed within the EPBC referral and are summarised below for each MNES.

3.1.1 Striped Legless Lizard

The upgrade of the existing unnamed government road to an 'all weather' gravel road bound with clay materials and lime, will enable access from Mooleric Road to the proposed poultry farm site. It is located at the north boundary of the proposed poultry farm. The installation of eight power poles within the road reserve is required to supply power to the site. Suitable habitat for the SLL was identified along the unnamed government road. SLL individuals were recorded in the road reserve during targeted surveys (Biosis 2024b). An informal vehicle track on the natural soil surface currently exists along the government road reserve.

The approved Conservation Advice for SLL under the EPBC Act (Threatened Species Scientific Committee 2016) says, "All populations of the SLL are likely to be important for the species recovery". Therefore, the population inhabiting the study site is considered to be part of an important population.

The proposed road upgrade and power pole installation will require the removal of some of the scattered existing vegetation (tussock-forming grasses), natural surface rock, and soil structure in the road reserve, all of which constitute habitat currently occupied by the species (see Figure 2). There is extensive suitable native grassland habitat within the property directly north of the project area, and the road reserve provides additional habitat, albeit of a lower quality of that to the north. The proposed action has the potential to impact on 1.265 hectares of SLL habitat. Installation of the power poles will temporarily impact on 0.01 hectares resulting in permanent disturbance of 1.255 hectares of SLL habitat. A total of 1.175 hectares of recorded SLL habitat will be retained within the project area.

The proposed action will therefore reduce the area of occupancy of the population. However, as the impact area is limited to the very southern portion of a wider population, the action does not have capacity to fragment the existing population. The property immediately north of the unnamed road reserve and directly east of Mooleric Road, on which a portion of Mount Gellibrand Wind Farm is situated, has not been accessible and survey for SLL has not been feasible. However, visual assessment from outside that property, along with aerial imagery indicates that it contains habitat largely suitable for SLL over a broad area of at least 600 hectares. The wind farm property to the immediate west of Mooleric Road supports a further area of at least 150 hectares of habitat considered suitable for SLL. It is evident that habitat within the project area forms part of a broader area of occupancy for the population.

Introduced vegetation may also establish as a result of native vegetation removal, however it is unlikely that the proposed works would adversely affect habitat deemed critical to the survival of the species, and it is unlikely to impact on the population as a whole. The proposed action may disrupt breeding of individuals utilising the small portion of the broader local distribution, the loss of this portion is unlikely to affect breeding within the broader local population.

An assessment was prepared as part of the SLL targeted survey (Biosis 2024b) using the significant impact criteria for Striped Legless Lizard outlined in *Environment Protection and Biodiversity Conservation Act 1999 referral guidelines for the vulnerable Striped Legless Lizard, Delma impar* (DSEWPC 2011a) and in accordance with the *Matters of National Environmental Significance Significant impact guidelines 1.1* (vulnerable species) (CoA 2013). The assessment of SLL in relation to Significant Impact Criteria determined all categories except one as

an unlikely to result in a significant impact. Likely significant impacts may occur from reducing the area of occupation of an important population. However, whilst the works will modify or destroy a small area of known habitat, the extent and scale of the road is unlikely to result in overall species decline. The impact area is limited to the southern portion of the wider population, and so the reduction in occupancy is minimal. Proposed delineation, marking, as no-go zones and exclusion fencing will minimise the risk of indirect impacts to retained SLL habitat.

Habitat that is not proposed to be impacted will be clearly delineated as a 'no-go' zone prior to construction, with temporary SLL-proof exclusion fencing constructed prior to the installation of the power poles, and upgraded to permanent SLL exclusion fencing prior to road upgrade works, and remain installed until completion of the project construction. The construction activities have the potential to cause direct mortality of individuals and the risk of predation may increase in the short to medium term due to exposure and loss of habitat. However, the road reserve consists of the extreme southern boundary of habitat suitable for SLL and the road has been kept to a minimal width so as to avoid impacts. As there is no habitat to its south, and SLL exclusion fencing is to be installed, the likelihood of SLL crossing the proposed upgraded road and being exposed to these risks appears very low. Implementation of measures outlined in Table 9 will help to mitigate these impacts to SLL during construction.

It is understood that DCCEEW has formed the position that the permanent loss of any amount of known habitat for an important population constitutes an important population. Therefore, despite the conclusions of the FFA, the proponent acknowledges that offsets are required to be secured to account for the deemed residual significant impacts to SLL. Further details on the offset strategy are provided in section 7.

Significant impact assessment

A significant impact is an impact which is important, notable, or of consequence, having regard to its context or intensity. Whether or not an action is likely to have a significant impact depends upon the sensitivity, value, and quality of the environment which is impacted, and upon the intensity, duration, magnitude and geographic extent of the impacts (CoA 2013).

Specific referral guidelines have been prepared for the Striped Legless Lizard, therefore an assessment has been prepared using the significant impact criteria for Striped Legless Lizard outlined in *Environmental Protection and Biodiversity Conservation Act 1999 referral guidelines for the vulnerable Striped Legless Lizard, Delma impar* (DSEWPC 2011a) (Table 3). An assessment has also been prepared in accordance with the *Matters of National Environmental Significance Significant impact guidelines 1.1 for vulnerable species* (CoA 2013). The self-assessment process assists a proponent in determining whether a significant impact is likely and whether a project should be referred. The significant impact assessment for Striped Legless Lizard is based on the current proposed road design provided by ProTen. Impacts can be reassessed upon the confirmation of the project impact area and construction methodologies.

Table 3 Assessment of Striped Legless Lizard *Delma impar* (listed vulnerable species) in relation referral guidelines for Striped Legless Lizard (flowchart in DEWHA 2011)

Referral guidelines for Striped Legless Lizard (DSEWPC 2011a)	**Outcome**	**Notes**
Could the impacts of the action occur within	Yes	The action occurs within modelled distribution for Striped Legless Lizard (DSEWPC 2011) and individuals have been recorded within the project area.

Referral guidelines for Striped Legless Lizard (DSEWPC 2011a)	**Outcome**	**Notes**
modelled distribution of the Striped Legless Lizard?		
Could the impacts of your action affect Striped Legless Lizard individuals or habitat?	Yes	The action will affect Striped Legless Lizard habitat and/or individuals. There is extensive suitable native grassland habitat within the property directly north and north-west of the project area, and although the project area consists of less coverage of native grassland habitat, it provides additional habitat for the species. The proposed action may result in slightly reduced area of occupancy for Striped Legless Lizard.
Have you surveyed for the Striped Legless Lizard using the recommended methods?	Yes	Artificial shelter site survey was undertaken by suitably qualified zoologists in accordance with the *Survey guidelines for Australia's threatened reptiles* (DSEWPC 2011). Striped Legless Lizard were recorded during survey efforts on four separate occasions, determined to be at least two (but potentially three) different individuals.
Could your action impact on an important population of Striped Legless Lizard or the species as a whole?	Yes	The EPBC Act defines an important population as one that is necessary for a species' long-term survival and recovery. This may include populations identified as such in recovery plans (DSEWPC 2011a), and/or that are: • Key source populations either for breeding or dispersal. • Populations that are necessary for maintaining genetic diversity. • Populations that are near the limit of the species range. An important population of Striped Legless Lizard must meet one of the criteria above and is considered likely to be viable in the long term. However, the subsequently approved Conservation Advice for Striped Legless Lizard under the EPBC Act (Threatened Species Scientific Committee 2016) says, "All populations of the Striped Legless Lizard are likely to be important for the species recovery". As a consequence, the population inhabiting the study site is considered to be part of an important population. The property directly north and north-west of the project area is occupied by Mount Gellibrand Wind Farm which underwent a Flora and Fauna assessment before development (BL&A 2005). BL&A determined there was marginal habitat throughout the wind farm site with the exception of the high-quality grasslands in the southern part of the site, which appears to correspond to the suitable Striped Legless Lizard habitat directly north of the project area. It is evident that habitat within the project area forms part of the broader area of occupancy for the population. Due to much of the existing habitat for this species being highly modified and fragmented, this population is important for species conservation. The proposed methodology for the road upgrade and boring required for the power pole installation requires the removal of existing vegetation and natural surface rock in the road reserve, therefore there is the potential to further reduce the area of occupancy of the population in the reserve and thus impact an important population. The project has potential to permanently impact upon 1.255 hectares of habitat that is the very southern portion of a wider population extending to the north. The action is unlikely to impact on the population as a whole.

Referral guidelines for Striped Legless Lizard (DSEWPC 2011a)	Outcome	Notes
Is your impact mitigation best practice so that it may reduce the significance of your impacts?	Yes	Conditional on adherence to mitigation measures recommended in section 4.
Could your action require a referral to the federal environment minister for significant impacts on the striped legless lizard?	Yes	The proposed works will result in decreased habitat for a population of Striped Legless Lizard. The proposed works may also limit dispersal between populations or habitat patches, through removal of vegetation or creation of a physical barrier. The action has been referred.

Table 4 Assessment of Striped Legless Lizard *Delma impar* (listed vulnerable species) in relation to Significant Impact Criteria for vulnerable species (DE 2011)

Significant impact criteria	Likelihood of significant impact	Notes
Lead to a long-term decrease in the size of an important population	Unlikely	As stated, the approved Conservation Advice for Striped Legless Lizard under the EPBC Act (Threatened Species Scientific Committee 2016) says, "All populations of the Striped Legless Lizard are likely to be important for the species recovery". As a consequence, the population inhabiting the study site is considered to be part of an important population. Due to the cryptic nature of the species, the extent and nature of habitat use within the project area is unknown. At least two, but possibly three, individuals were located during surveys, which suggests that the area may provide breeding habitat. However, the area is highly modified and quality of grassland is lower than that on the properties immediately north and north-west of the project area. The habitat to the south is unsuitable for SLL and highly disturbed by a quarry and past land-uses, so the road reserve represents a narrow strip of the southernmost portion of the population. Compliance with recommended mitigation and rehabilitation measures (section 4) will ensure the project does not lead to a long-term decrease in the size of the population. There is a high degree of certainty in the assessment of this criteria considering the local population likely extends into several hundred hectares of grassland north and west of the project area, and is unlikely to be notably impacted given the proposed mitigation measures.
Reduce the area of occupancy of an important population	Likely	Striped Legless Lizards were identified in the project area. Although the area is highly modified and dominated by introduced flora, it is unknown whether the project area acts as primary or secondary habitat for the species. Works in the project area will result in the direct

Significant impact criteria	Likelihood of significant impact	Notes
		removal or modification of known habitat, including impacts on tussock-forming grasses, rocks and soil structure. Therefore, a very small reduction in the area of occupancy for an important population is likely to occur.
Fragment an existing population into two or more populations	Unlikely	Striped Legless Lizards are known to have limited dispersal capability (Threatened Species Scientific Committee 2016) and significant landscape features such as rivers or roads are likely boundaries to their dispersal. The land to the south of the western end of the road reserve is occupied by the Ombersley Quarry, which is too disturbed to provide habitat for Striped Legless Lizard. The remaining land to the south of the road reserve is used for livestock grazing and the soil is highly disturbed, and much of this land has been assessed for the proposed Ombersley Poultry Farm and determined to be currently unsuitable habitat for Striped Legless Lizard (Biosis 2023). The property directly north of the project area is occupied by Mount Gellibrand Wind Farm which underwent a Flora and Fauna assessment before development (BL&A 2005). BL&A determined there was marginal habitat throughout the wind farm site with the exception of the high-quality grasslands in the southern part of the site, which appears to correspond to the suitable Striped Legless Lizard habitat directly north of the project area. There is a high degree of confidence that the adjacent Wind Farm supports extensive suitable habitat and a population of SLL, based on; the assessment of habitat condition from the boundary fence which recorded areas of native rocky grassland,, and review of recent and historical aerial imagery, which revealed minimal habitat disturbance. It is therefore apparent that the proposed project will entail the permanent loss of 1.255 hectares of habitat for Striped Legless Lizards that is the southern-most strip of a wider population extending substantially into adjacent land to the north of the road reserve. As such the action does not have capacity to fragment the existing population.
Adversely affect habitat critical to the survival of a species	Unlikely	It is unlikely that the proposed action would adversely affect habitat deemed critical to the survival of the species. The habitat within the proposed impact area is significantly degraded and subject to ongoing threats and adverse land-use. The project area is not at the edge of the species distribution, and targeted surveys recorded low numbers (two individuals) within the area.
Disrupt the breeding cycle of an important population	Unlikely	The life history of the Striped Legless Lizard is poorly known. However, it is believed that females deposit up to two eggs every year in December to January, within a soil cavity or under rocks in communal nests. It is considered likely that Striped Legless Lizard are distributed throughout the project area and a wider area of land to its north. All habitat suitable for the species is understood to also be suitable for the species to breed. The project may disrupt breeding of individuals utilising the small portion of the broader local distribution occupied by the project area, but loss of that portion is unlikely to affect breeding within the broader local population. To minimise disruption to the

Significant impact criteria	Likelihood of significant impact	Notes
		breeding cycle, works within the road reserve should occur outside of the breeding season (which is from December to February). While there is a degree of uncertainty in the life history of the species, the impacts to the population within the local area are unlikely to impact the breeding succuss of the broader local population as impacts are restricted to a small area of degraded habitat, and are unlikely to cause notable indirect impacts to the population in adjacent habitat.
Modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline	Unlikely	Whilst the works will modify or destroy a small area of known habitat, the extent and scale of the road is unlikely to result in overall species decline. The species occurs throughout Victoria, NSW, and Canberra, across at least 45 individual localities and an estimated 180 km^2 area of occupancy (Clemann et al. 2017).
Result in invasive species that are harmful to a vulnerable species becoming established in the vulnerable species' habitat	Unlikely	The study area is located in an agricultural landscape within close proximity of an active quarry, and major highway. A range of regionally common pest plant and animal species and exotic pasture grasses are established within and surrounding the study area. The proposed project does not include any known mechanism that would result in the establishment of invasive species harmful to Striped Legless Lizard that are not already present in the local area.
Introduce disease that may cause the species to decline	Unlikely	The proposed works do not include any known mechanism that would result in the introduction of a disease relevant to the species that is not already present in the local area.
Interfere with the recovery of the species	Unlikely	The proposed works will not interfere with the recovery of the species in respect to the ten specific objectives for recovery outlined in the in the National Recovery Plan for Striped Legless Lizard (Smith and Robertson 1999). Short-term disturbance or a very small number of mortalities are unlikely to interfere with the species' overall recovery.

3.1.2 Growling Grass Frog

The construction of the water pipeline will link the proposed poultry farm with the Birregurra township and will involve construction techniques of open trenching and directional boring.

Potential GGF habitat and a movement corridor were identified in the original pipeline alignment. The construction of the pipeline via directional drilling would constitute an impact where potholes would need to be dug at regular intervals to under bore the full length of the movement corridor. Therefore, the alignment of the pipeline has since been revised to avoid any direct impacts to areas of GGF habitat. Direct impacts are consequently avoided, however there may still be indirect impacts through construction activities if not managed appropriately. Proposed management measures are outlined in section 5.

3.1.3 Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowlands Plains

The southern boundary of the proposed farm site supports two patches of Plains Grassy Wetland EVC of a high enough quality to qualify for the Threatened Ecological Community, Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowlands Plains (Critically Endangered). The patches of Plains Grassy Wetland and the constructed dam provide potential habitat for GGF, Matted Flax-lily and Clover Glycine. These species were not detected within the site, however a precautionary approach is being taken as there is potential habitat present, and adequate surveys were not conducted to demonstrate absence of these values. Direct impacts to this community could occur if mitigation measures are not in place. Proposed management measures are outlined in section 5.

3.2 Risk assessment for potential impacts to MNES

The following section is a risk assessment based on the potential likelihood and consequences of the above impacts on MNES as identified through the assessment process. This process outlines a risk profile for each stage of the proposed action informed by these impacts.

Each potential impact has been given a rating in terms of likelihood of occurring and consequence using the criteria in Table 5 and Table 6 below. These ratings are then combined using the risk rating matrix outlined in Table 7 to generate a risk rating of low, medium, high or severe.

Details of the potential impacts to MNES and resulting risk rating are included in Table 8 and informs the management measures in section 4 and 5 below.

Table 5 Likelihood

Qualitative measure of likelihood	How likely is it that this event/issue will occur after control strategies have been put in place
Highly likely	Is expected to occur in most circumstances
Likely	Will probably occur during the life of the project
Possible	Might occur during the life of the project
Unlikely	Could occur but considered unlikely or doubtful
Rare	May occur in exceptional circumstances

Table 6 Consequences

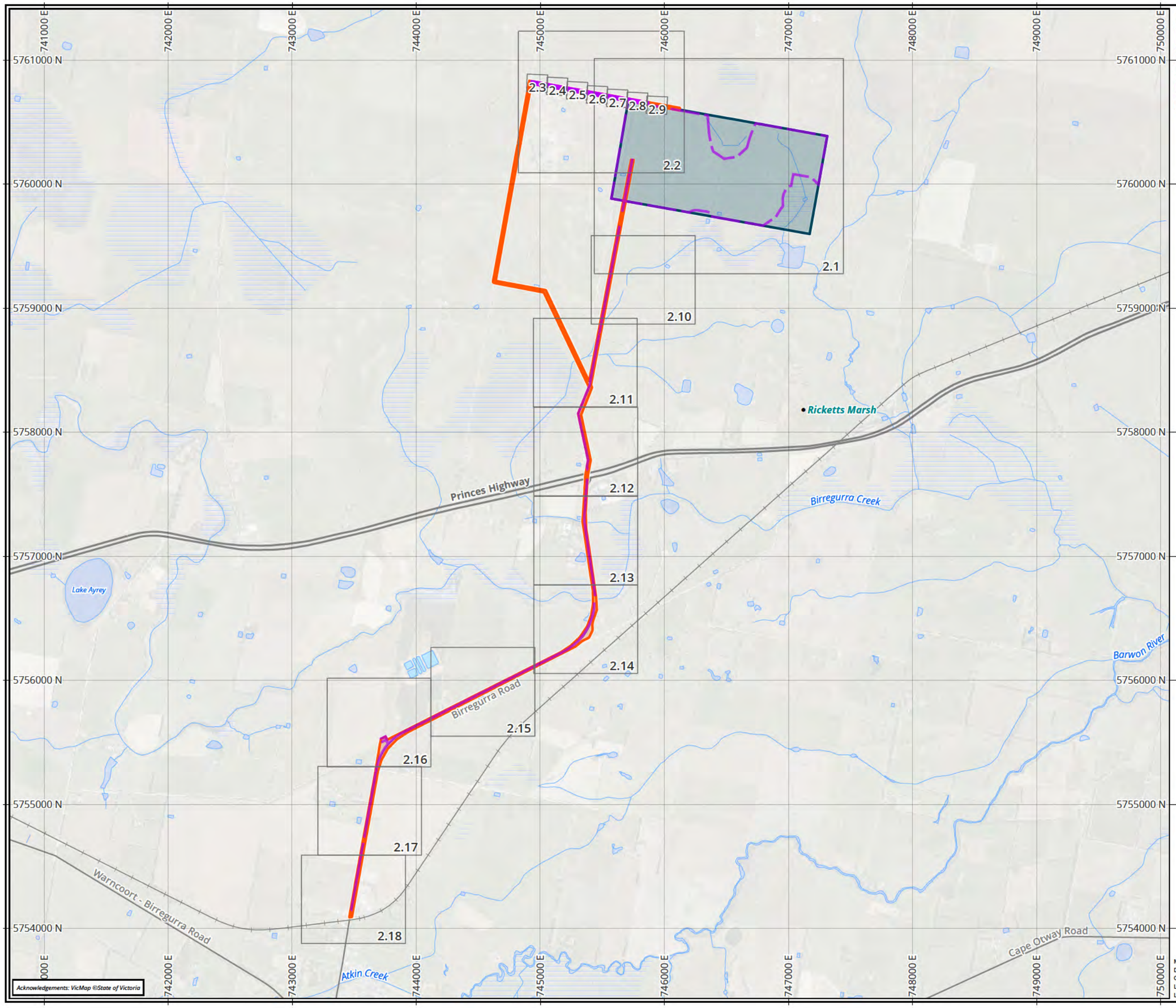
Qualitative measure of consequences	What will be the consequence/result if this issue does occur rating
Minor	Minor incident of environmental damage that can be reversed
Moderate	Isolated but substantial instances of environmental damage that could be reversed with intensive efforts
High	Substantial instances of environmental damage that could be reversed with intensive efforts
Major	Major loss of environmental amenity and real danger of continuing
Critical	Severe widespread loss of environmental amenity and irrecoverable environmental damage

Table 7 Risk rating

Likelihood	Consequence				
	Minor	**Moderate**	**High**	**Major**	**Critical**
Highly Likely	Medium	High	High	Severe	Severe
Likely	Low	Medium	High	High	Severe
Possible	Low	Medium	Medium	High	Severe
Unlikely	Low	Low	Medium	High	High
Rare	Low	Low	Low	Medium	High

Table 8 Potential impacts to MNES

MNES	Potential impacts	Consequence	Likelihood	Risk
Striped Legless Lizard	• Permanent removal and modification of habitat	Minor	Highly Likely	Medium
	• Reduction in area of occupancy of an important population	Minor	Highly Likely	Medium
	• Directly mortality risk	Minor	Rare	Low
	• Exposure to predation	Minor	Rare	Low
	• Introduction of invasive species	Minor	Rare	Low
	• Introduction of pathogens	Moderate	Rare	Low
Growling Grass Frog	• Disturbance from noise and vibration	Minor	Unlikely	Low
	• Risk of fauna entrapment in open trenches.	Minor	Unlikely	Low
	• Potential degradation of nearby dispersal habitat.	Minor	Unlikely	Low
Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains	• Indirect impacts to wetland hydrology.	Minor	Possible	Low
	• Incorrect placement of exclusion fencing leading to direct impacts on community.	Minor	Unlikely	Low
	• Sediment or chemical pollution of wetlands through construction activities.	High	Possible	Medium



Legend

- Disturbance footprint

Project area

- Poultry farm
- Road development
- Pipeline

Figure 2.0 Impacts of the proposed action: overview

0 240 480 720 960 1,200

Metres

Scale: 1:28,000 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 30 January 2026,
Checked by: SH, Drawn by: SP, Last edited by: smitchell
Layout: 43957_F2_Impacts
Location: P:\43900s\43957\Mapping\43957_BirregurraPoultryFarm_EPBC_Var.aprx

Legend

- Disturbance footprint

Project area

- Poultry farm
- Road development
- Pipeline
- Trenching (impacts to scattered native vegetation likely, no impacts to patch vegetation)
- Directional boring of pipeline (impact to native vegetation patches avoided)

Proposed activity

- Temporary disturbance area for power installation
- Powerpole
- High-voltage electricity line
- Laydown area
- Tanks
- Swale drain
- Pipe
- Farmhouse
- Water retention pond

Cultural heritage

- Area of cultural heritage sensitivity

Threatened fauna habitat

- Striped Legless Lizard
- Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

Ecological vegetation classes (EVCs)

- 125 Plains Grassy Wetland

EPBC listed threatened ecological communities

- Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains

Other native vegetation

- Scattered native vegetation including Basalt Poa. However, not considered native vegetation in the Guidelines.

Current wetlands (DEECA)

- 2 - Freshwater meadow
- 3 - Shallow freshwater marsh
- 5 - Permanent open freshwater

Figure 2.1 Impacts of the proposed action: poultry farm

0 50 100 150 200 250

Metres

Scale: 1:6,000 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

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APEM Group

Matter: 42700,
Date: 30 January 2026,
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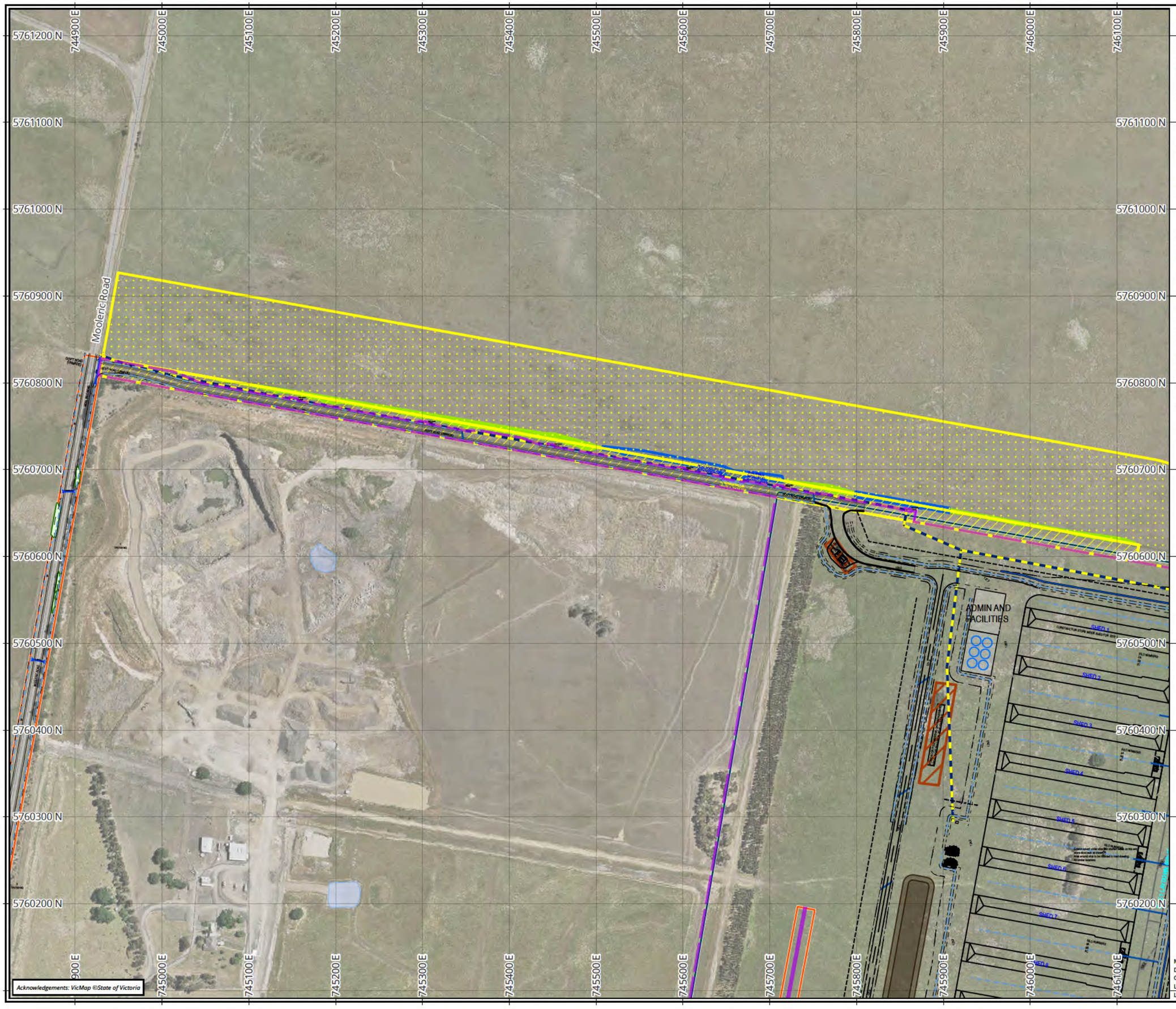

Legend

- Disturbance footprint

Project area

- Poultry farm
- Road development
- Pipeline

Proposed activity

- Temporary disturbance area for power installation
- Powerpole
- High-voltage electricity line
- Laydown area
- Tanks
- Swale drain
- Pipe

Threatened fauna habitat

- Striped Legless Lizard
- Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

Ecological vegetation classes (EVCs)

- 55_61 Plains Grassy Woodland
- 125 Plains Grassy Wetland

Other native vegetation

- Scattered native vegetation including Basalt Poa. However, not considered native vegetation in the Guidelines.

Figure 2.2 Impacts of the proposed action: road development

0 30 60 90 120 150

Metres

Scale: 1:4,000 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

biosis

APEM Group

Matter: 42700,
Date: 30 January 2026,
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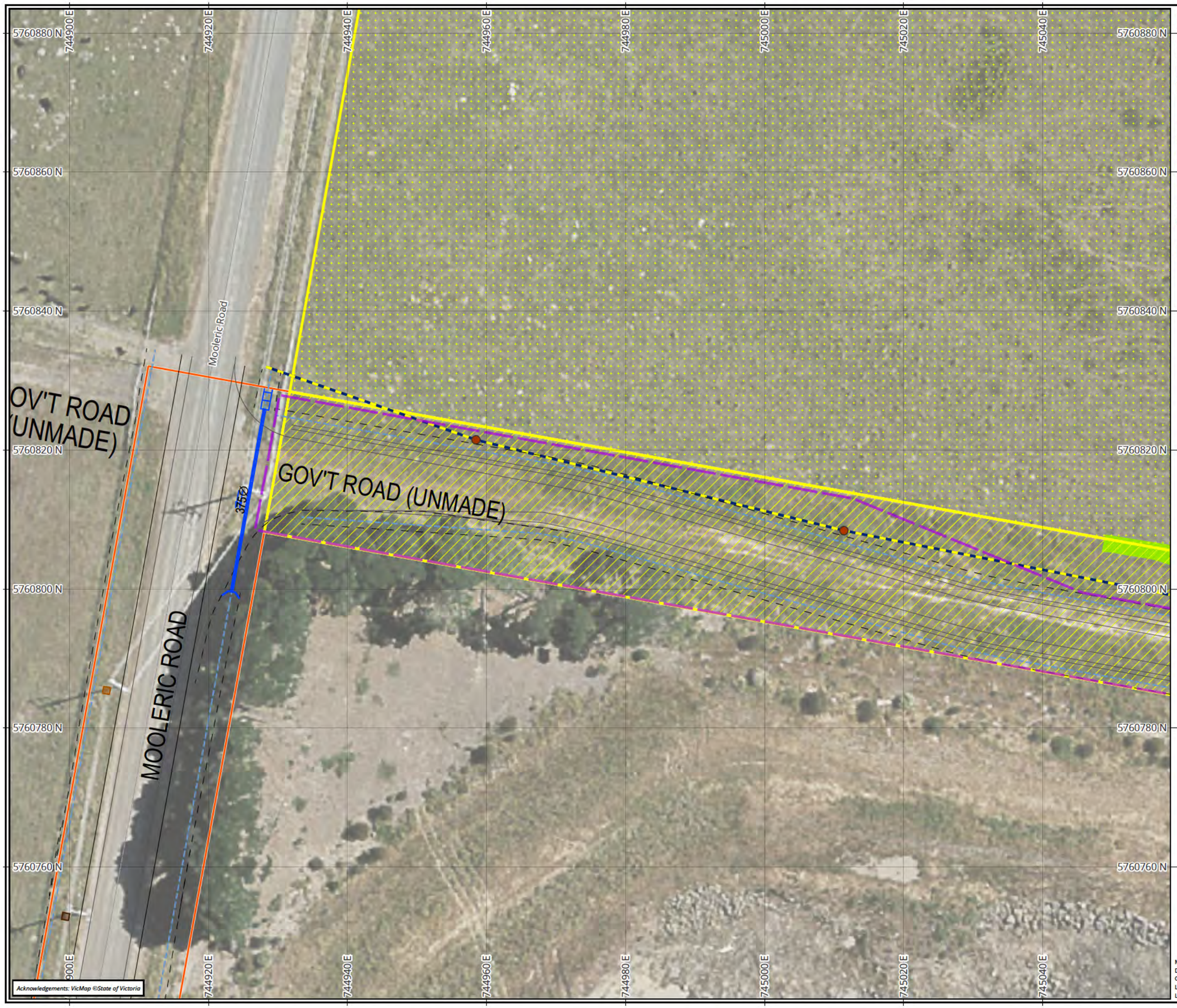

Legend

- Disturbance footprint

Project area

- Road development
- Pipeline
- Powerpole
- High-voltage electricity line

Threatened fauna habitat

- Striped Legless Lizard
- Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

Other native vegetation

- Scattered native vegetation including Basalt Poa. However, not considered native vegetation in the Guidelines.

Figure 2.3 Impacts of the proposed action: road and power detail

0 4 8 12 16 20

Metres

Scale: 1:500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 30 January 2026,
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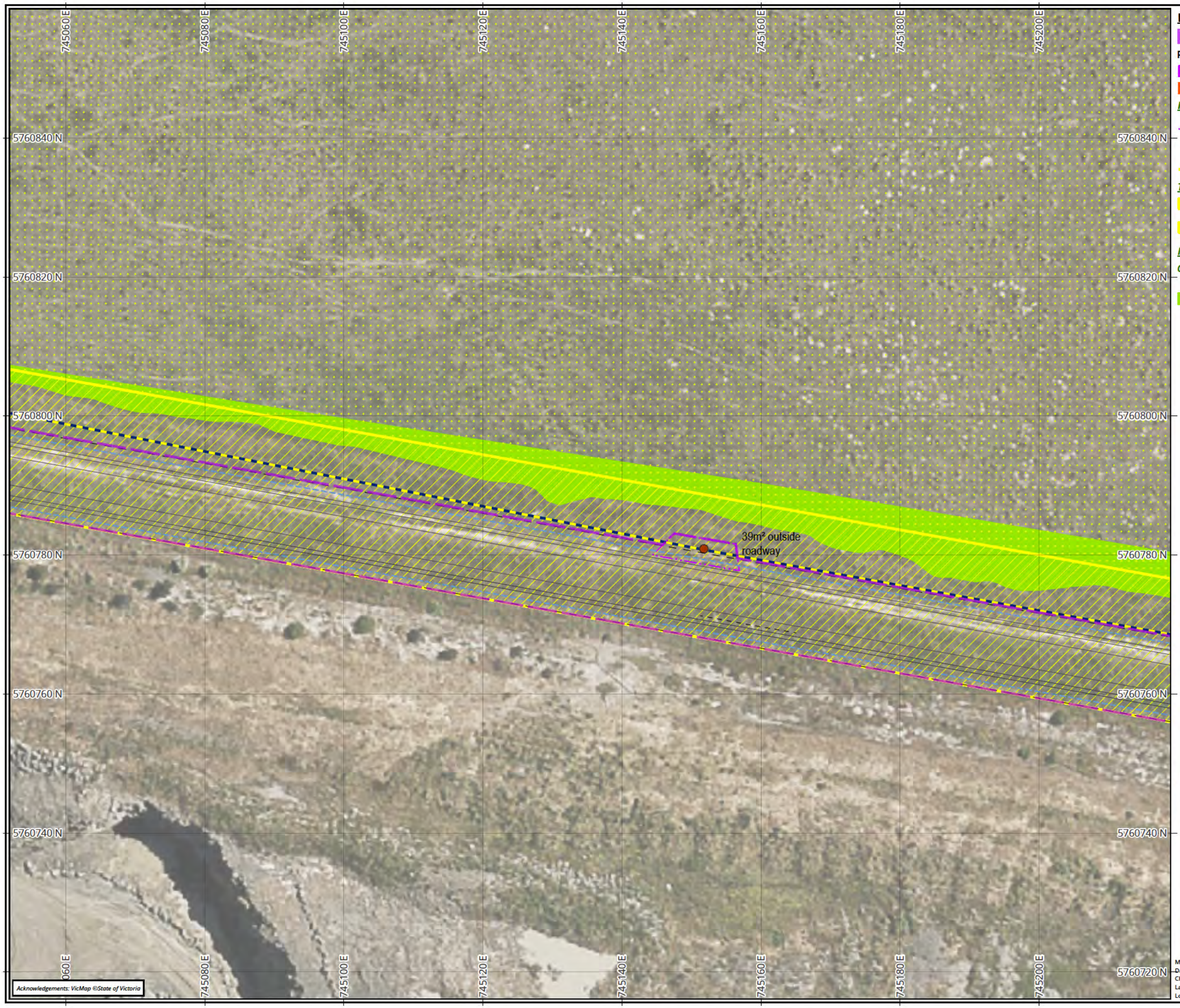

Legend

- Disturbance footprint

Project area

- Road development
- Pipeline

Proposed activity

- Temporary disturbance area for power installation
- Powerpole
- High-voltage electricity line

Threatened fauna habitat

- Striped Legless Lizard
- Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

Other native vegetation

- Scattered native vegetation including Basalt Poa. However, not considered native vegetation in the Guidelines.

Figure 2.4 Impacts of the proposed action: road and power detail

0 4 8 12 16 20

Metres

Scale: 1:500 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

biosis

APEM Group

Matter: 42700,
Date: 30 January 2026,
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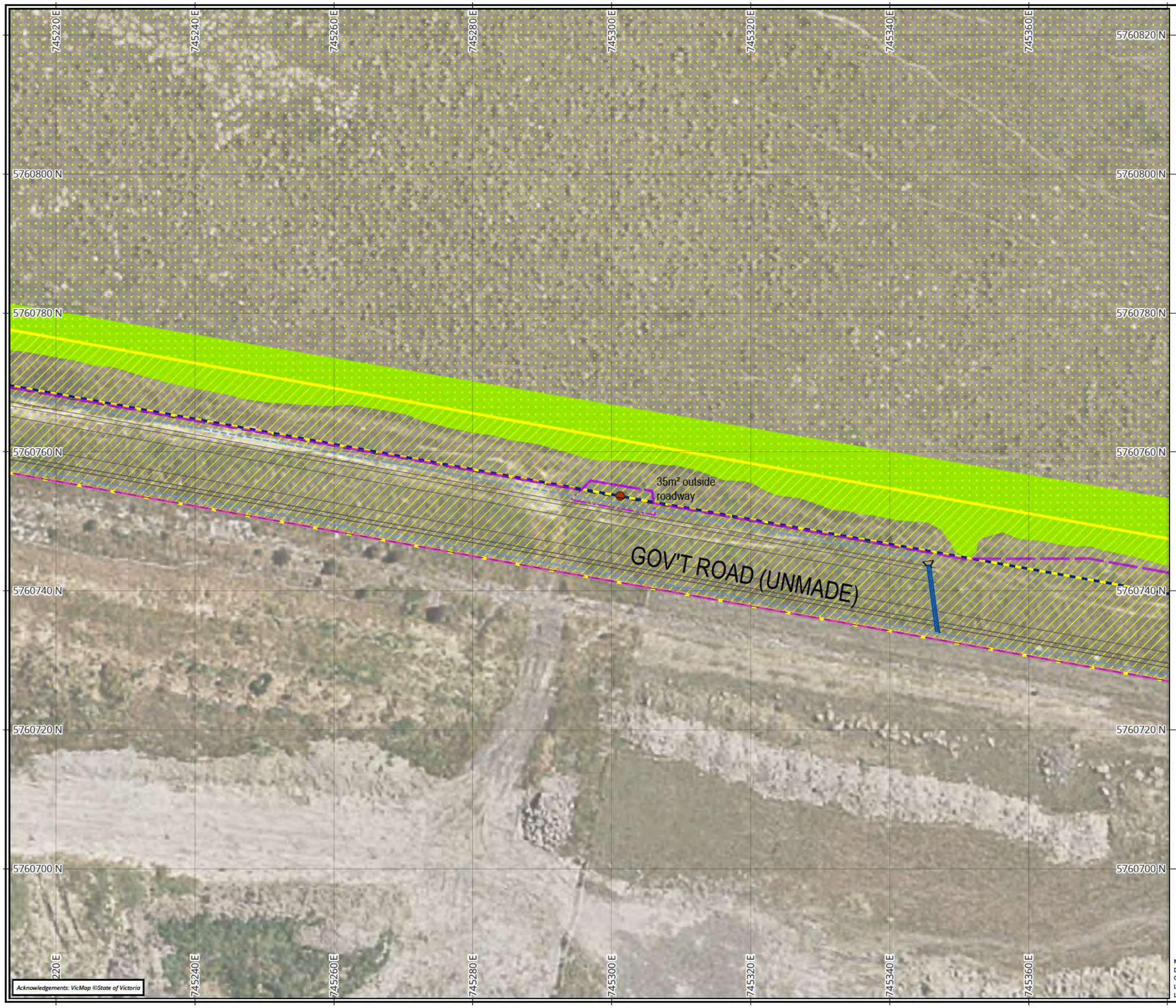

Legend

- Disturbance footprint

Project area

- Road development
- Pipeline

Proposed activity

- Temporary disturbance area for power installation
- Powerpole
- High-voltage electricity line
- Pipe

Threatened fauna habitat

- Striped Legless Lizard
- Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

Other native vegetation

- Scattered native vegetation including Basalt Poa. However, not considered native vegetation in the Guidelines.

Figure 2.5 Impacts of the proposed action: road and power detail

0 4 8 12 16 20

Metres

Scale: 1:500 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

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APEM Group

Matter: 42700,
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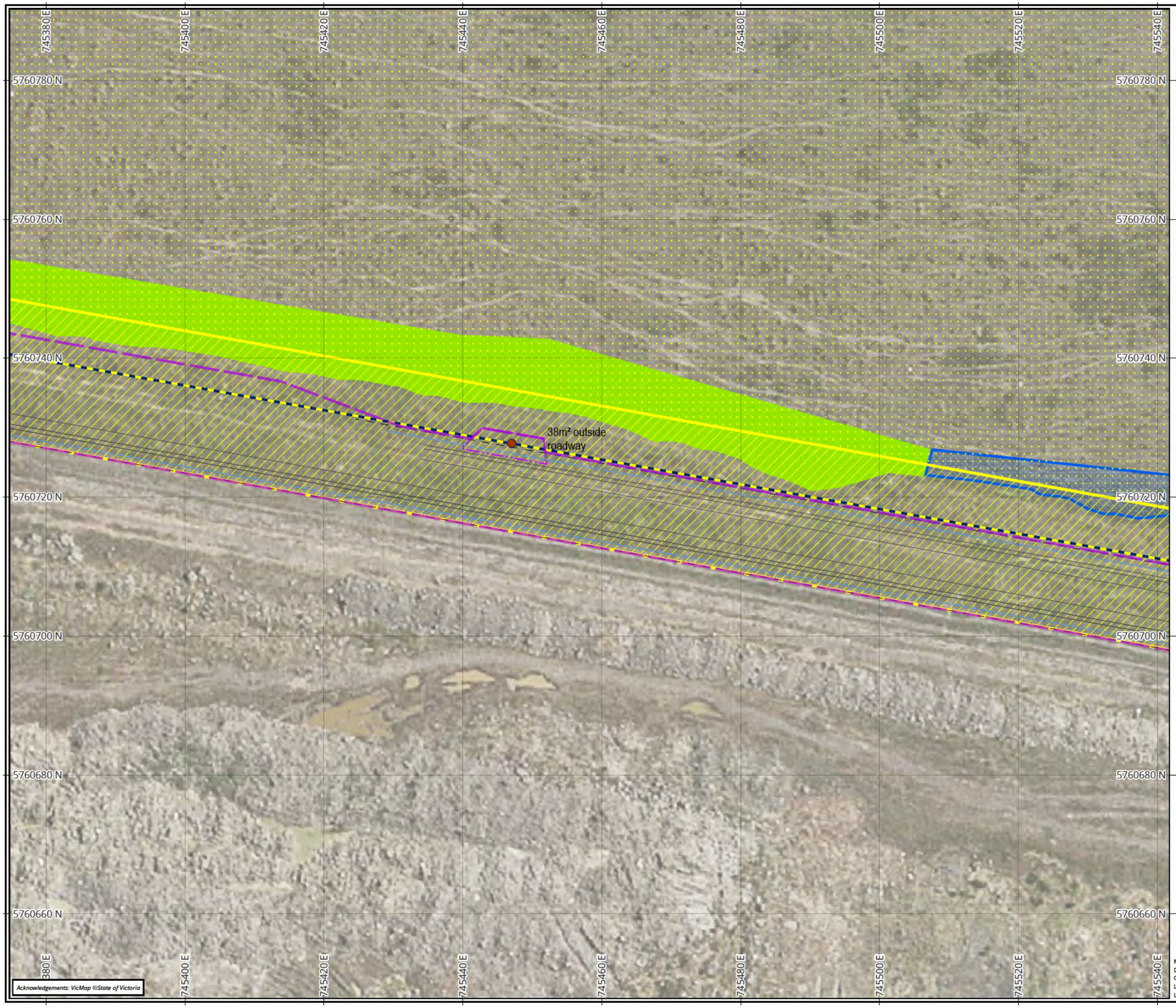

Legend

- Disturbance footprint

Project area

- Road development
- Pipeline

Proposed activity

- Temporary disturbance area for power installation
- Powerpole
- High-voltage electricity line

Threatened fauna habitat

- Striped Legless Lizard
- Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

Ecological vegetation classes (EVCs)

- 125 Plains Grassy Wetland

Other native vegetation

- Scattered native vegetation including Basalt Poa. However, not considered native vegetation in the Guidelines.

Figure 2.6 Impacts of the proposed action: road and power detail

0 4 8 12 16 20

Metres

Scale: 1:500 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

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APEM Group

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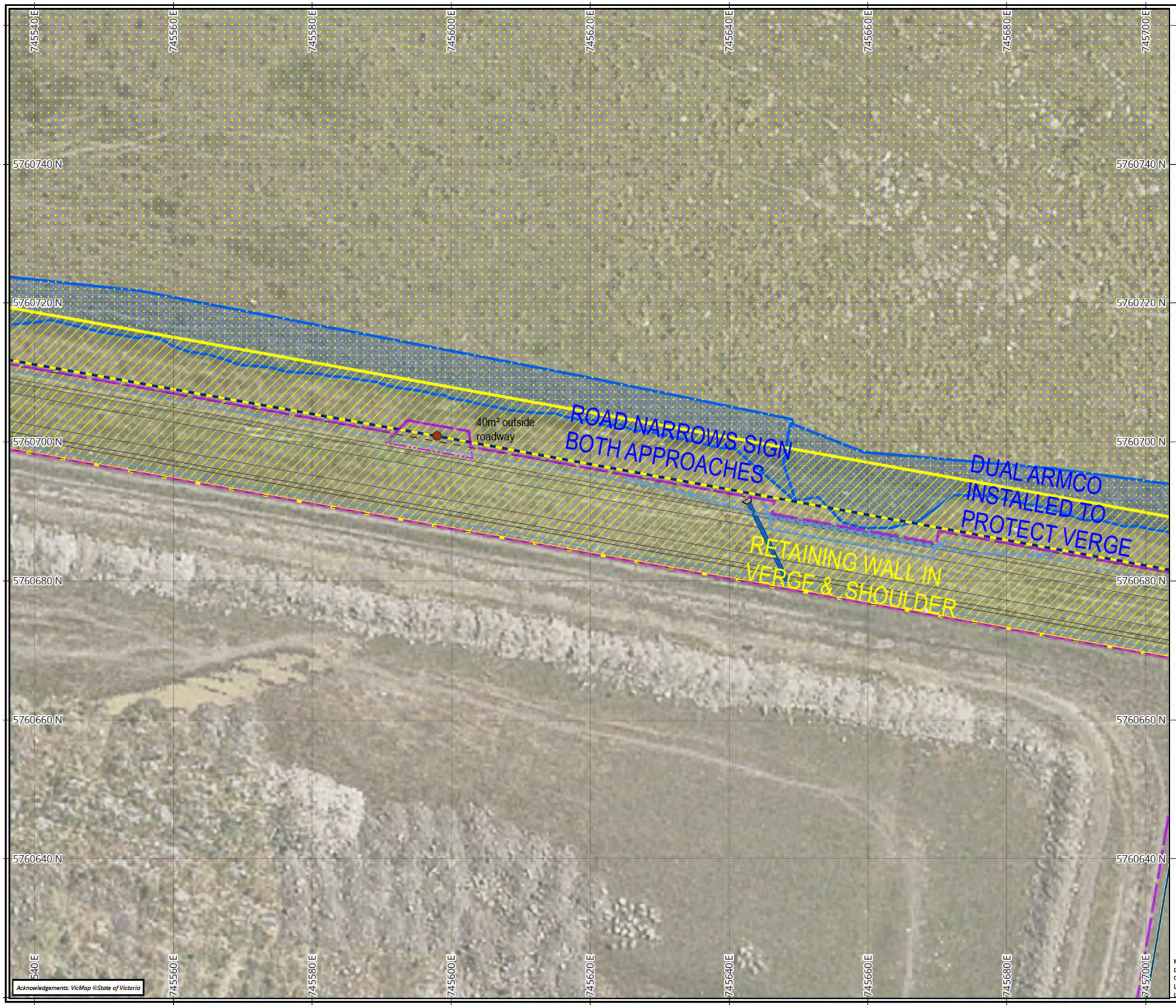

Legend

- Disturbance footprint

Project area

- Poultry farm
- Road development
- Pipeline

Proposed activity

- Temporary disturbance area for power installation
- Powerpole
- High-voltage electricity line
- Pipe

Threatened fauna habitat

- Striped Legless Lizard
- Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

Ecological vegetation classes (EVCs)

- 125 Plains Grassy Wetland

Figure 2.7 Impacts of the proposed action: road and power detail

0 4 8 12 16 20

Metres

Scale: 1:500 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

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APEM Group

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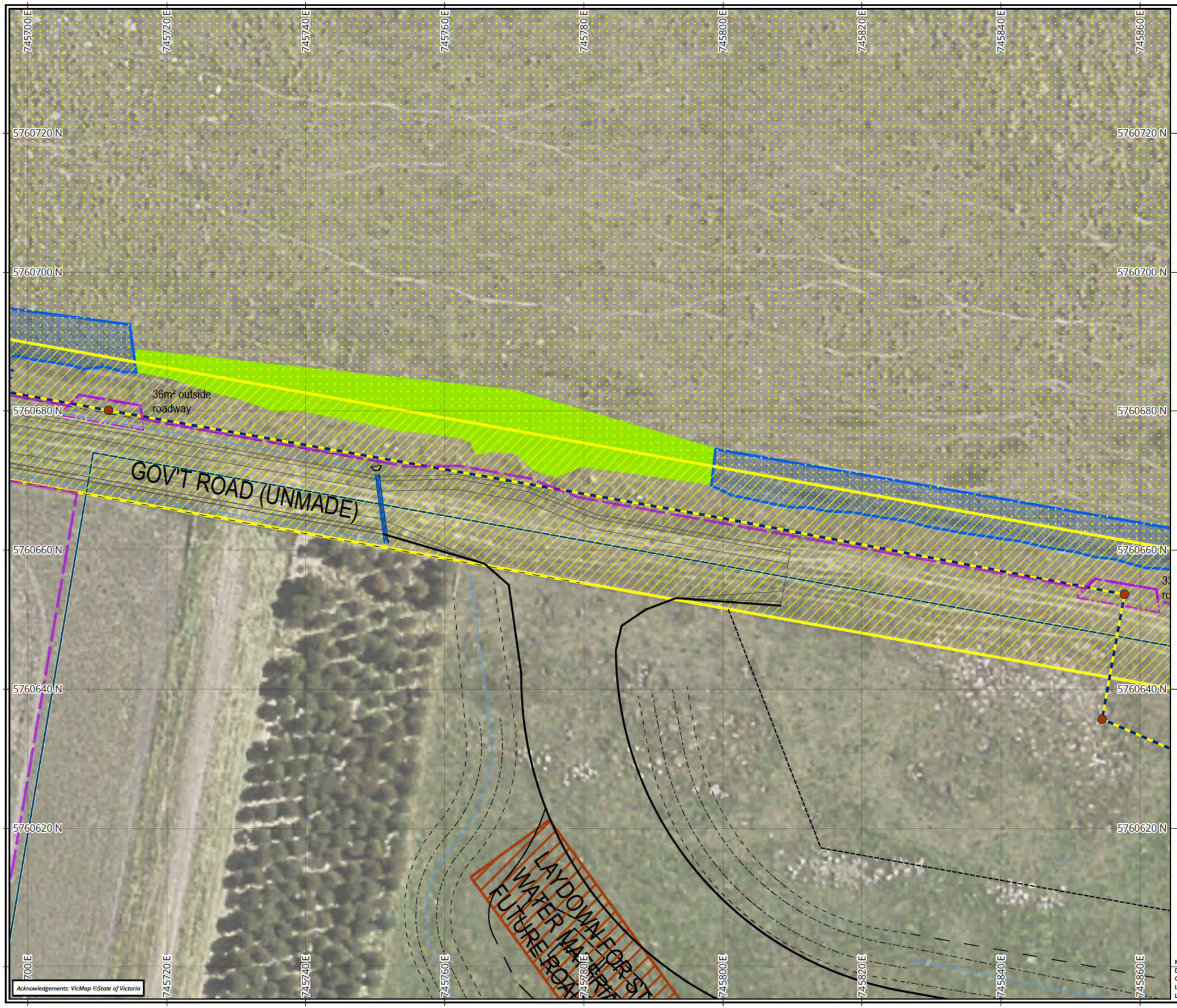

Legend

- Disturbance footprint

Project area

- Poultry farm
- Road development
- Pipeline

Proposed activity

- Temporary disturbance area for power installation
- Powerpole
- High-voltage electricity line
- Laydown area
- Swale drain
- Pipe

Threatened fauna habitat

- Striped Legless Lizard
- Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

Ecological vegetation classes (EVCs)

- 125 Plains Grassy Wetland

Other native vegetation

- Scattered native vegetation including Basalt Poa. However, not considered native vegetation in the Guidelines.

Figure 2.8 Impacts of the proposed action: road and power detail

0 4 8 12 16 20

Metres

Scale: 1:500 @ A3

Coordinate System: GDA2020 MGA Zone 54

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Location: P:\43900s\43957\Mapping\43957_BirregurraPoultryFarm_EPBC_Var.aprx

745860 E
745880 E
745900 E
745920 E
745940 E
745960 E
745980 E
746000 E
746020 E

5760680 N
5760660 N
5760640 N
5760620 N
5760600 N
5760580 N

33m² outside roadway

127.0

Acknowledgements: VicMap ©State of Victoria

Legend

Disturbance footprint

Project area

Poultry farm
Road development
Pipeline

Proposed activity

Temporary disturbance area for power installation
Powerpole
High-voltage electricity line
Swale drain

Threatened fauna habitat

Striped Legless Lizard
Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

Ecological vegetation classes (EVCs)

125 Plains Grassy Wetland

Other native vegetation

Scattered native vegetation including Basalt Poa. However, not considered native vegetation in the Guidelines.

Figure 2.9 Impacts of the proposed action: road and power detail

0 4 8 12 16 20
Metres
Scale: 1:500 @ A3
Coordinate System: GDA2020 MGA Zone 54

N

biosis
APEM Group

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745500 E
745600 E
745700 E
745800 E
745900 E
746000 E
746100 E
746200 E

5759500 N
5759400 N
5759300 N
5759200 N
5759100 N
5759000 N
5758900 N

Legend

Disturbance footprint

Project area

Pipeline

Trenching (impacts to scattered native vegetation likely, no impacts to patch vegetation)

Native vegetation

Ecological vegetation classes (EVCs)

125 Plains Grassy Wetland

EPBC listed threatened ecological communities

Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains

Current wetlands (DEECA)

2 - Freshwater meadow

3 - Shallow freshwater marsh

Figure 2.10 Impacts of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

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5758900 N
5758800 N
5758700 N
5758600 N
5758500 N
5758400 N
5758300 N
745000 E
745100 E
745200 E
745300 E
745400 E
745500 E
745600 E
745700 E

Legend

Disturbance footprint

Project area

Pipeline

Trenching (impacts to scattered native vegetation likely, no impacts to patch vegetation)

Directional boring of pipeline (impact to native vegetation patches avoided)

Threatened fauna habitat

Burrowing Crayfish burrows

Native vegetation

Ecological vegetation classes (EVCs)

55_61 Plains Grassy Woodland

125 Plains Grassy Wetland

EPBC listed threatened ecological communities

Potential Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains (key diagnostic species present, but wetland too small to qualify as community)

Current wetlands (DEECA)

2 - Freshwater meadow

99 - No Category

Figure 2.11 Impacts of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

biosis

APEM Group

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Legend

- Disturbance footprint

Project area

- Pipeline
- Trenching (impacts to scattered native vegetation likely, no impacts to patch vegetation)
- Directional boring of pipeline (impact to native vegetation patches avoided)

Threatened fauna habitat

- Growling Grass Frog
- Growling Grass Frog movement corridor

Current wetlands (DEECA)

- 2 - Freshwater meadow
- 6 - Semi-permanent saline

Figure 2.12 Impacts of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

biosis

APEM Group

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Date: 30 January 2026,
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Location: P:\43900s\43957\Mapping\43957_BirregurraPoultryFarm_EPBC_Var.aprx

Legend

Disturbance footprint

Project area

Pipeline

Trenching (impacts to scattered native vegetation likely, no impacts to patch vegetation)

Threatened fauna habitat

Growling Grass Frog

Growling Grass Frog movement corridor

Native vegetation

Ecological vegetation classes (EVCs)

647 Plains Sedgy Wetland

Current wetlands (DEECA)

6 - Semi-permanent saline

99 - No Category

Figure 2.13 Impacts of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

biosis

APEM Group

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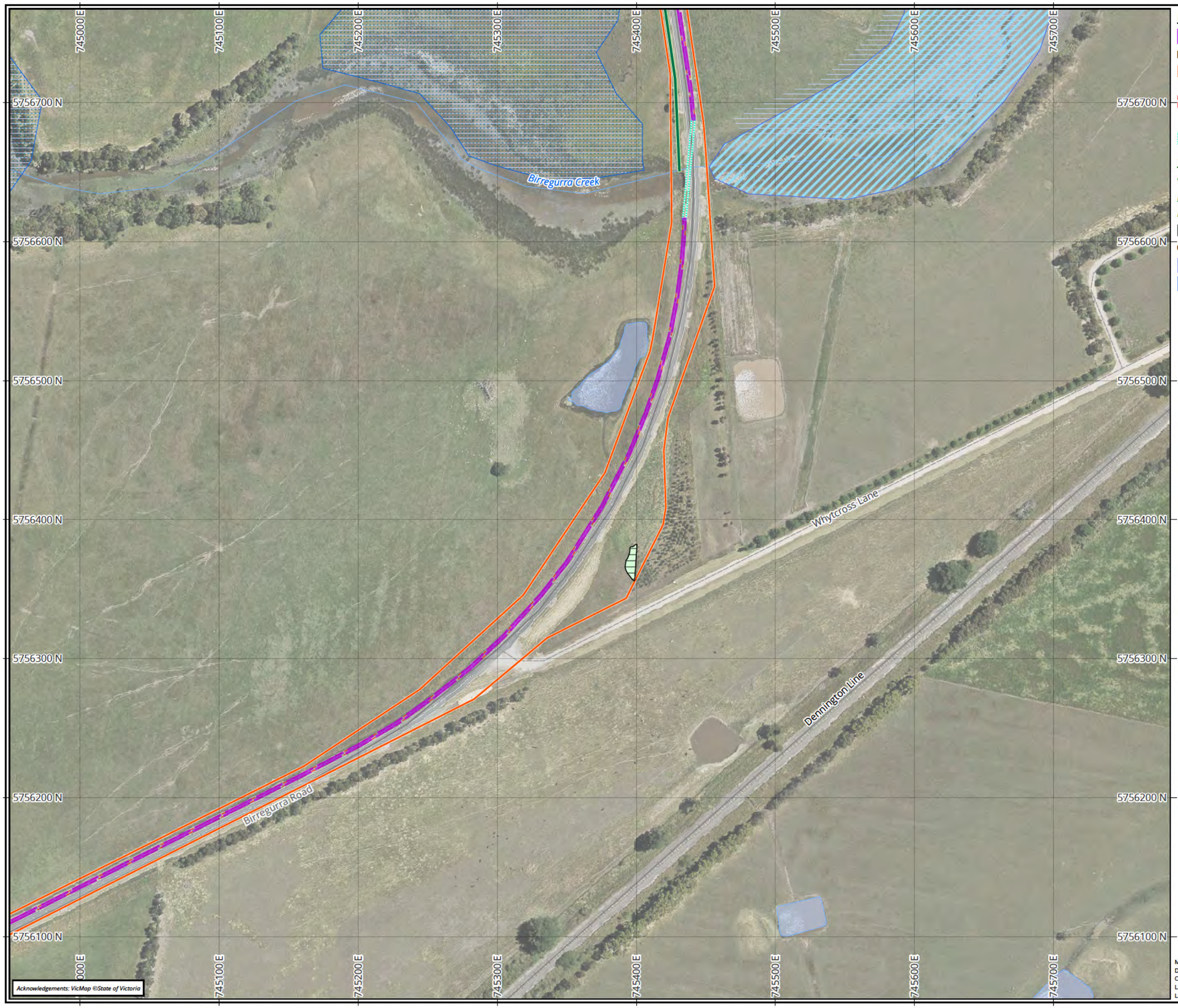

Legend

- Disturbance footprint

Project area

- Pipeline
- Trenching (impacts to scattered native vegetation likely, no impacts to patch vegetation)
- Directional boring of pipeline (impact to native vegetation patches avoided)

Threatened fauna habitat

- Growling Grass Frog movement corridor

Native vegetation

Ecological vegetation classes (EVCs)

- 175 Grassy Woodland

Current wetlands (DEECA)

- 6 - Semi-permanent saline
- 99 - No Category

Figure 2.14 Impacts of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

biosis

APEM Group

Matter: 42700,
Date: 30 January 2026,
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Layout: 43957_F2_Impacts
Location: P:\43900s\43957\Mapping\43957_BirregurraPoultryFarm_EPBC_Var.aprx

Legend

- Disturbance footprint

Project area

- Pipeline
- Trenching (impacts to scattered native vegetation likely, no impacts to patch vegetation)

Figure 2.15 Impacts of the proposed action: pipeline detail

N

0 20 40 60 80 100

Metres

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

Matter: 42700,
Date: 30 January 2026,
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Layout: 43957_F2_Impacts
Location: P:\43900s\43957\Mapping\43957_BirregurraPoultryFarm_EPBC_Var.aprx

Legend

- Disturbance footprint

Project area

- Pipeline
- Trenching (impacts to scattered native vegetation likely, no impacts to patch vegetation)

Figure 2.16 Impacts of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

biosis

APEM Group

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Date: 30 January 2026,
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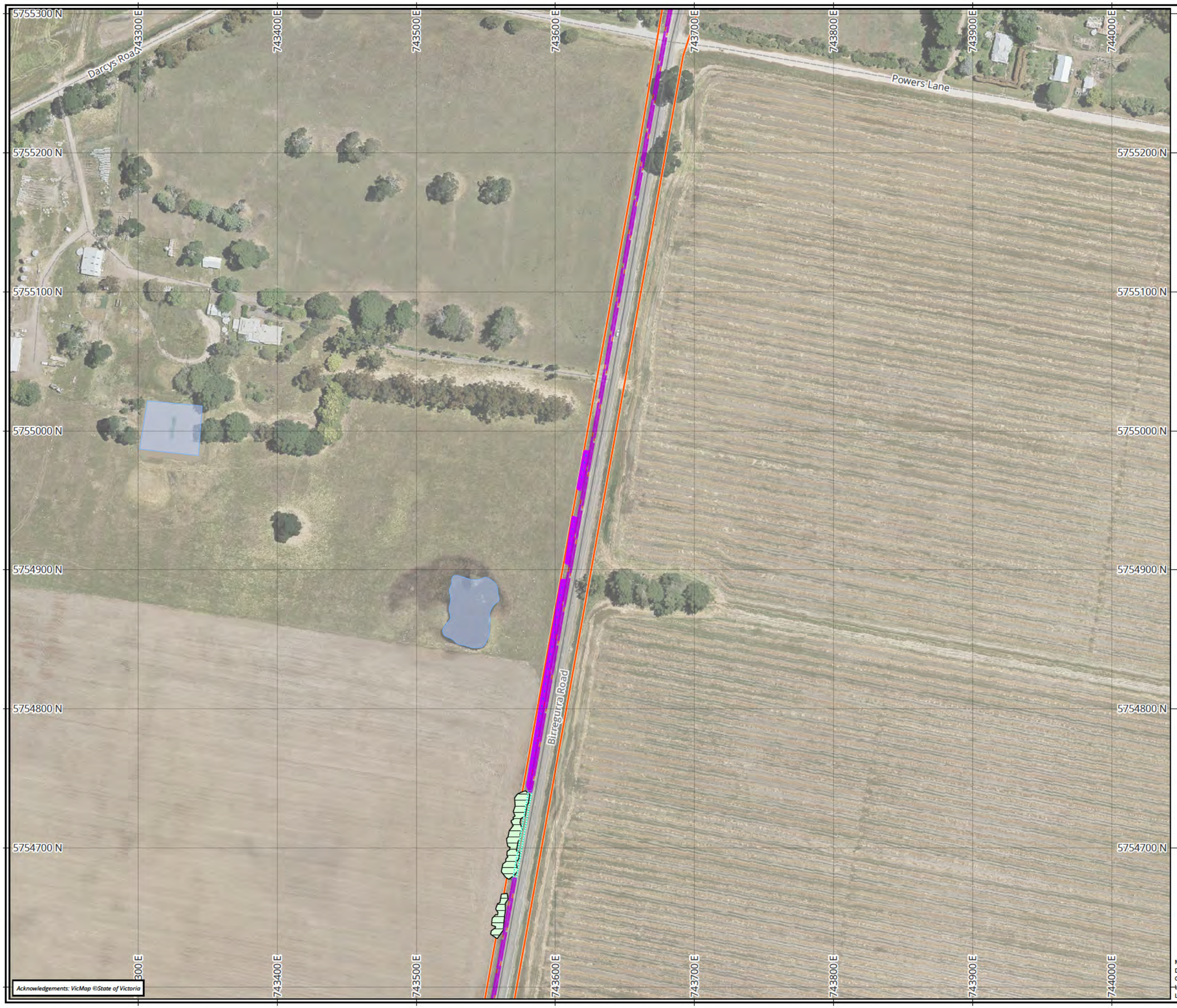

Legend

Disturbance footprint

Project area

Pipeline

Trenching (impacts to scattered native vegetation likely, no impacts to patch vegetation)

Directional boring of pipeline (impact to native vegetation patches avoided)

Native vegetation

Ecological vegetation classes (EVCs)

175 Grassy Woodland

647 Plains Sedgy Wetland

Figure 2.17 Impacts of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

biosis

APEM Group

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Legend

- Disturbance footprint

Project area

- Pipeline
- Trenching (impacts to scattered native vegetation likely, no impacts to patch vegetation)

Native vegetation

Ecological vegetation classes (EVCs)

- 175 Grassy Woodland
- 647 Plains Sedgy Wetland

Figure 2.18 Impacts of the proposed action: pipeline detail

0 20 40 60 80 100

Metres

Scale: 1:2,500 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

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APEM Group

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4. MNES mitigation measures

A list of impact mitigation measures for MNES existing within and adjacent to the works area are outlined in the sections below. The following are general mitigation measures:

- Prior to the commencement of works the Project Manager will ensure that the impact area and key site features are clearly established and identifiable on-ground and on plans. The following items must be established and clearly identified:
  - Impact area – establish the impact area with exclusion fencing appropriate to the site. All construction works must be confined to the defined impact area or 'project area'.
  - Access points for the impact area must be made obvious to all staff and contractors prior to commencement of works and at all times during the construction process.
  - Stockpile locations.
  - Site facilities and vehicle parking area.
  - Site sediment and erosion controls.
  - Site fencing
  - Site waste and recycling storage facilities.
  - Chemical spill clean-up facilities or kits.
- All staff are to be inducted by either an ecologist on-site or induction material that includes photos and descriptions of MNES, their locations and contractor obligations prior to working on the site.
- MNES values, risks and mitigation obligations are to be covered as a reminder in each pre-start/toolbox during morning sign in.
- The project manager should provide/display materials that improve awareness about MNES and contractor obligations for risk mitigation.

4.1 Striped Legless Lizard

Construction of the access road and power pole installation is located within SLL habitat. The construction footprint has been adjusted to minimise impacts to SLL habitat. In addition, the following mitigation measures will be followed:

- Construction exclusion fencing will be used to delineate the boundary of the impact footprint during construction. Outside the construction exclusion fencing is to be a No-go zone for any works including laydown areas or access for vehicle or machinery. This is important to ensure that the condition of SLL habitat surrounding the project area does not deteriorate.
- Construction of an SLL exclusion fence between the mapped SLL habitat and construction area. During construction, salvaged SLL from the impact footprint will be relocated as close as possible to the capture location but within suitable habitat and cover within protected No-go areas. The SLL exclusion fence will mitigate the risk of SLL returning into the construction area. The fence must be constructed with a material impervious to the movement of small fauna such as builder's dampcourse/polycourse, fly mesh or sediment fencing cloth. The material must be taut, dug into the ground at least 10 centimetres deep and sit above the ground at least 40 centimetres. The fence must

be free of all gaps, be checked daily and maintained as necessary throughout the construction period. The fence construction must be supervised by an ecologist to provide fauna salvage where required and signed off by the ecologist as being fit for purpose once constructed.

- The construction methodology for power pole installation will involve bore footing that is limited to the pole footprint only. Each pole is individually installed with excavated material either returned and compacted around the pole, spread within the existing road footprint, or removed to stockpile areas within the farm footprint. All plant and equipment will operate from the existing road surface and pole assembly and fit-out will occur within a designated laydown areas inside the property. Impacts to SLL habitat in the area around the poles will be temporary.
- Laydown and materials storage areas must be identified and clearly defined on-site prior to commencement of any construction.
- As seen in Figure 2, all ancillary infrastructure will be located within the poultry farm area to avoid additional impacts to SLL habitat. All measures outlined in this preliminary documentation must be integrated into the project's Site Environmental Management Plan/s.
- Restore habitat in areas of soil or habitat disturbance using locally indigenous grass species known to be habitat for SLL.
- Earthworks must be carried out in a manner to maintain the existing soil profile by stockpiling relevant layers and restoring them in sequence.
- Ensure that surface and/or embedded rocks, or other refuge sites (e.g. logs) are not removed from the site. As necessary relative to construction disturbance, reintroduce or increase the cover of surface refuges outside the immediate alignment of the new all-weather road to augment existing habitat.
- During construction, all open trenches and holes excavated for poles must be checked daily for the presence of threatened fauna and an ecologist must be on call to remove any trapped animals to adjacent areas of appropriate habitat. To the extent practicable, trenches and holes must be excavated and back-filled on the same day. This should form part of the fauna salvage procedure (see section 6).
- Salvage and relocation of SLL and any other native vertebrate fauna within impacted habitat areas prior to and during works occurring.
- Individuals found within the construction footprint will be relocated into adjacent connected habitat. The SLL exclusion fence will reduce the risk of relocated individuals returning into the construction footprint. See section 6 for detailed fauna salvage protocols.

4.2 Growling Grass Frog

The pipeline footprint has been realigned to the east side of Birregurra Road to avoid direct impact to GGF (Figure 1). To avoid indirect impacts to the adjacent GGF habitat the following mitigation measures should be followed:

- Star pickets with high visibility bunting should be used to delineate the boundary of the impact footprint during construction. Outside the impact footprint is to be a No-go zone for any works including laydown areas or access for vehicle or machinery.
- Appropriate sediment control measures such as silt fencing to avoid runoff and contamination of GGF habitat within or adjacent to the GGF corridor.

- Daily checks of all open pits and trenches are to be conducted prior to works to ensure no GGF are trapped within open pits or trenches.
- Any GGF found within the works area are to be relocated by a suitably qualified ecologist into the closest suitable habitat.

4.3 Habitat for aquatic MNES within Birregurra Creek

- Star pickets with high visibility bunting should be used to delineate the boundary of the impact footprint during construction. Outside the impact footprint is to be a No-go zone for any works including laydown areas or access for vehicle or machinery.
- Sediment and erosion control measures should be implemented prior to construction works commencing (e.g. silt fences, sediment traps), to protect aquatic habitat within Birregurra Creek. These should conform to relevant guidelines, should be maintained throughout the construction period and should be carefully removed following the completion of works.
- Dust suppression measures should be implemented during construction.
- Works will be stopped if conditions are not suitable, such as during and after heavy rain.
- All plant and equipment are to be confined within the works area. This will avoid impacting flora and fauna associated with the Birregurra Creek system.
- All plant and equipment, chemical storage, refueling or any action with the potential to spill contaminants is to be undertaken at least 30 metres away from waterways using a built for purpose fuel tender that is in good condition and does not have defects or leaks. Appropriate procedures must be in place to contain all contaminants within the works footprint.
- Vehicles, plant and equipment will be subject to a clean-down protocol to ensure they are free of weeds and soil which may contain weed seeds before entering the construction site.
    - Ensure all vehicles, plant and equipment wash down occurs in designated areas.

4.4 Seasonal Herbaceous Wetlands (freshwater) of the Temperate Lowland Plains (Critically Endangered)

The following are measures to avoid potential impacts to the areas of Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains. These measures must be further detailed in a CEMP to be prepared prior to the commencement of construction:

- Construction exclusion fencing must be used to delineate the boundary of the impact footprint during construction. Outside the impact footprint is to be a No-go zone for any works including laydown areas or access for vehicle or machinery.
- Sediment and erosion control measures must be implemented prior to construction works commencing (e.g. silt fences, sediment traps), to protect Birregurra Creek. These must conform to relevant guidelines, be maintained throughout the construction period and be carefully removed following the completion of works.
- Dust suppression measures must be implemented during construction.
- The stockpiling of chemicals and materials must be avoided immediately adjacent to the patches of this ecological community in the south-eastern and southern section of the poultry farm.

- All plant and equipment, chemical storage, refueling or any action with the potential to spill contaminants is to be undertaken at least 30 metres away from waterways using a built for purpose fuel tender that is in good condition and does not have defects or leaks. Appropriate procedures must be in place to contain all contaminants within the works footprint.
- Vehicles, plant and equipment will be subject to a clean-down protocol to ensure they are free of weeds and soil which may contain weed seeds before entering the construction site.

5. Operational plan and adaptive management

The management actions required for the works associated with the Birregurra–Ombersley Poultry Farm are summarised in Table 9, including the responsible person, indicative timing of each action and measurable outcomes.

Table 9 Summary of MNES management actions for the project works

Management action	Timing	Frequency	Responsible persons	Measurable outcomes	Adaptive measures
Pre-Construction Phase					
SLL exclusion fence • An SLL-proof temporary exclusion fence must be erected prior to the commencement of any works and remain in place for the entirety of the power pole installation. • Temporary fence must be removed following installation of power poles and be replaced with a permanent SLL-proof fence between the road reserve and SLL habitat. • All fencing installation must be supervised by a qualified ecologist.	Prior to any works or vehicle usage adjacent to SLL habitat.	Initial temporary fence construction and removal. One-off permanent fence construction. Checked daily during construction to ensure SLL cannot enter the works footprint area.	ProTen & construction staff. Checked by ecologist after initial construction.	• No SLL detected within impact area. • Fencing intact for the duration of works.	• Repair fencing as required. • Suspend works if breaches occur. • Review design if repeated incursions.
SLL relocation • Relocation of SLL individuals into adjacent habitat prior to the commencement of work.	Prior to any ground disturbance within SLL habitat.	Salvage undertaken in accordance with the protocol outlined in section 6. Once prior to construction in time of species activity between October and March. Daily trench inspections during construction.	Suitably qualified ecologist. ProTen & construction staff.	• All SLL relocated within 100m of capture site. • Trench inspections documented.	• Revise salvage approach as required. • Increase supervision as required.

Management action	Timing	Frequency	Responsible persons	Measurable outcomes	Adaptive measures
		Relocation undertaken as required.			
No-go areas, fencing and bunting • Construction exclusion fencing or star pickets with high visibility bunting to be erected at the edges of the impact footprint to protect surrounding MNES habitat.	Prior to any works at any currently active work zone within the project area.	Constructed once. Regularly checked to maintain no-go area.	ProTen & construction staff.	• Clear separation of the works zone and impact area from the surrounding MNES habitat. • No access or disturbance in no-go areas.	• Reinstate fencing as required. • Undertake toolbox talks following non-compliance.
Construction staff induction • Construction staff briefed on locations of MNES habitat and ecological value. • Construction staff briefed on fauna management actions.	Initial induction of staff. Daily pre-starts. Prior to any fauna salvage activities.	Daily.	ProTen. Ecologist for fauna salvage activities.	• All staff inducted and have an awareness of MNES requirements and fauna procedures (a list of wildlife carers and veterinary clinics can be found in Appendix 2.	• Repeat inductions as required. • Targeted briefings if incidents occur.
Establish indirect effects controls • Install sediment fencing to contain run-off adjacent to seasonal herbaceous wetlands and Birregurra Creek or areas where sediment can run off downslope. • Procedures for safe refuelling and chemical use that ensures contaminants are contained within the works footprint.	Prior to any works occurring within the works footprint.	Constructed once. Regularly checked to maintain original function.	ProTen & construction staff.	• Sediment, chemicals and contaminants contained within impact area.	• Upgrade or relocate controls. • Cease works during suitable conditions.
Engage ecologist • Pre-clearance check prior to vegetation removal or ground disturbance.	Prior to works and as per advice of the ecologist.	As determined by ecologist.	ProTen.	• Pre-clearance checks completed. • MNES mitigation measures implemented.	• Increase ecological oversight.

Management action	Timing	Frequency	Responsible persons	Measurable outcomes	Adaptive measures
• Initial excavator scrape of the all-weather road prior to works to salvage SLL. • As per the advice of the ecologist determined during pre-works assessment.					
Construction Phase					
Habitat retention • No impact on habitat outside impact area. • Salvage of logs from vegetation removal. • Minimize removal of embedded rock and refuge habitat.	During works.	Ongoing.	ProTen, construction staff & ecologist.	• No degradation of habitat outside of impact area. • Retained habitat is protected. • Maintain existing soil profile by stockpiling relevant layers and restoring them in sequence.	• Stop works as required. • Reinstate fencing as required. • Rehabilitate disturbed areas.
Maintenance of No-go areas • No vehicles or personnel to enter No-go areas. • No trenching, soil excavation or stockpiling of soil to occur within No-go areas. • No storage of materials, equipment, vehicles or waste outside of designated works zones. • Regular inspections of fencing and bunting to ensure compliance and maintenance of No-go areas.	During works.	Ongoing.	ProTen.	• No vehicles, personnel or stockpiling within no-go areas.	• Repair fencing as required. • Enforce site controls.

Management action	Timing	Frequency	Responsible persons	Measurable outcomes	Adaptive measures
• Repairs to fencing to be undertaken as necessary.					
Daily checks of work areas and trenches • Daily checks of works areas, particularly adjacent to SLL habitat. • Daily checks of trenches and pits to determine the presence or absence of protected species. • If species detected, cease work and engage an ecologist to undertake fauna salvage and relocation according to this management plan. • Daily water quality inspections of wetlands and the Birregurra creek during construction works for the proposed farm and water pipeline. • Sediment controls to be maintained throughout the construction period. • Works will be stopped if conditions are not suitable, such as during and after heavy rain.	Beginning and end of works.	Daily.	ProTen & construction staff.	• No fauna entrapment. • Ecologist on-call to remove and re-locate any trapped fauna. • Excavate and back-fill on same day wherever practicable. • Sediment controls functioning effectively.	• Engage ecologist. • Modify controls as required.
Earthworks for power poles • Individual power pole holes will be bored with the soil carefully removed and deposited around the pole, either spread to the south or removed from the site. • Ensure that surface and/or embedded rocks, or other refuge sites (e.g. logs) are not removed from the site. As	During works.	Ongoing.	ProTen.	• Soil successfully reinstated at completion of works.	• Monitor successful reestablishment following completion of works and consider alternative measures if not successful.

Management action	Timing	Frequency	Responsible persons	Measurable outcomes	Adaptive measures
necessary relative to construction disturbance, reintroduce or increase the cover of surface refuges outside the immediate alignment of the new all-weather road to augment existing habitat.					
Unexpected threatened species • Stop work immediately upon discovery of threatened fauna. • Follow the unexpected threatened species procedure in section 8 of this report.	Immediately on identification of unexpected species.	Ongoing.	ProTen, construction staff & ecologist.	• No significant impacts on MNES from unexpected encounters.	• Stop works. • Follow unexpected species procedure. • Notify regulators as required.
Post-Construction Phase					
Post-Construction Inspection • Inspection of the construction site once all works are completed will be undertaken prior to the removal of fences and other protective elements associated with the No-go areas.	At the completion of construction works.	Undertaken once.	ProTen & construction staff.	• No unintentional impacts to MNES. • Identify disturbed areas.	• Implement additional rehabilitation if impacts identified.
Removal of temporary structures • Removal all temporary structures, including sediment controls and construction fencing. • Minimum of soil disturbance must be achieved.	At the completion of construction works.	Undertaken once.	ProTen & construction staff.	• Temporary structures removed. • Minimal soil disturbance.	• Stabilise disturbed ground. • Additional reinstatement.
Revegetation of habitat	ASAP after completion of	Ongoing.	ProTen	• Disturbed MNES habitat restored to pre-works	• Supplementary planting.

Management action	Timing	Frequency	Responsible persons	Measurable outcomes	Adaptive measures
• Restore disturbed SLL habitat through construction of the all-weather road and power poles using retained soil profiles, refuge values and appropriate indigenous grass species. Reintroduce or increase the cover of surface refuges. • Identified disturbed areas of MNES habitat to be restored as soon as possible after construction works are completed.	construction works.			condition as far as practicable.	• Adaptive management if establishment fails.
Operational Phase					
Road use and access control • Restrict all vehicle movements to the constructed road surface. • Prevent access, widening or encroachment into adjacent SLL habitat. • Maintain signage, barriers, or fencing where required to reinforce access controls.	During operation	Ongiong	ProTen	• Vehicle movements confined to constructed road. • No encroachment into adjacent SLL habitat.	• Install additional signage or barriers. • Review access controls if non-compliance observed.
Road maintenance and drainage • Maintain road surface and drainage to prevent erosion or runoff into SLL habitat. • Undertake routine inspections following heavy rainfall. • Implement remedial works promptly where erosion or degradation is identified.	During operation	Routine and circumstantial.	ProTen	• Road surface and drainage maintained to prevent erosion into SLL habitat.	• Undertake remedial maintenance. • Modify drainage if erosion observed.

Management action	Timing	Frequency	Responsible persons	Measurable outcomes	Adaptive measures
Vegetation and verge management • Manage roadside vegetation to maintain sightlines and access without degrading SLL habitat. • Avoid mowing, slashing, or works outside the defined road verge. • Rehabilitate any areas of inadvertent disturbance.	During operation	Routine / as required.	ProTen	• Roadside vegetation managed without degradation of SLL habitat.	• Adjust mowing or methods. • Rehabilitate disturbed verges.
Monitoring of SLL habitat adjacent to road • Periodically inspect retained and reinstated SLL habitat adjacent to the road. • Identify any signs of degradation attributable to road use. • Engage an ecologist to advise on additional protection or rehabilitation measures if impacts are detected.	During operation	Periodic	ProTen	• No observable decline in retained SLL habitat attributable to road use.	• Engage ecologist. • Implement additional protection or rehabilitation measures.

6. Salvage and relocation protocols

6.1 Striped Legless Lizard salvage protocol

SLL have very small home ranges and are considered genetically differentiated at distances of less than 400 metres (Maldonado et al. 2012). We consider the movement of SLL individuals greater than 100 metres from the capture location as a translocation. Translocation of SLL will be avoided due to its high degree of uncertainty for success (DELWP 2015). Translocation requires approval from the Translocation Evaluation Panel in which case all works must cease until the translocation of impacted individuals is granted. Translocation involves the moving of individuals into a new and unfamiliar area, whereas relocating individuals within their previous area of occupancy is less likely to negatively impact the individual or other populations. As such, translocation is deemed to be an unreliable mitigation measure and does not form part of this project.

Suitable contiguous habitat exists immediately north of impact footprint. All salvaged SLL individuals should be relocated into this area, as close as possible to the capture location but within suitable habitat and cover.

SLL salvage prior to construction will involve the following:

- The initial works and fauna salvage for SLL should only be undertaken when the species is active between October and March to reduce the risk of mortality to relocated individuals.
- Prior to undertaking the initial works and fauna salvage, an SLL exclusion fence must be installed between the works footprint and the protected No-go zone SLL habitat. This will allow a location for relocation with a significantly reduced risk of SLL moving back into the works footprint area. The fence should be installed under the supervision of an ecologist.
- A brief induction will be given to the excavator operator to inform them of the salvage and relocation procedure.
- The salvage will require an initial excavator scrape for all SLL habitat within the impact footprint.
- The scrape requires slow and gentle removal of the vegetation and top 100 millimetres of soil with a wide toothed excavator bucket. An ecologist should supervise the scrape within the minimum safe distance of the bucket and signal the operator to immediately stop work in the event SLL are found.

SLL salvage during construction will involve the following:

- During construction, especially while any trenches are open, all trenches must be checked daily for the presence of SLL and other fauna. An ecologist must be on call to re-locate any trapped animals to the adjacent No-go zone SLL habitat area.

6.1.1 Striped Legless Lizard capture and relocation process

The capture and relocation of SLL will involve the following:

- Any SLL caught during all salvage operations will be immediately transferred to securely tied breathable cloth bags prior to relocation.
- Transportation of any obviously injured SLL to a veterinarian experienced with small reptile health management.
- Take photographs of dorsal head-scales to identify individual animals prior to release.

- Any SLL located within the works area are to be relocated into the adjacent grassland north of the road footprint within suitable habitat, and no more than 100m from the capture location.

6.2 Growling Grass Frog salvage protocol

Growling Grass Frog are mobile species that utilises dispersal habitat to move between higher quality patches of breeding habitat, forming dynamic metapopulations throughout the landscape (DEWHA 2009b, Heard & Scroggie 2009). Given their movement patterns throughout the landscape, the species will often intersect construction works within the vicinity of their movement corridors. The footprint for the pipeline has been relocated to avoid the GGF habitat and movement corridors, and several mitigation measures to protect GGF and Birregurra Creek are outlined in sections 5.2 and 5.3 of this management plan. Despite the low likelihood of the works impacting upon the species, fauna salvage protocols are outlined below as a precautionary measure.

The process for GGF fauna salvage is outlined below:

- A brief induction to the excavator operator to inform them of the salvage and relocation procedure.
- During construction, especially while any trenches are open, all trenches must be checked daily for the presence of SLL and other fauna. An ecologist must be on call to remove any trapped animals and relocate to adjacent areas of appropriate habitat.

6.2.1 Growling Grass Frog capture and relocation process

Growling Grass Frog are also highly susceptible to the spread of Chytrid Fungus, a fatal fungal infection and one of the main threatening processes for the species (Heard et al. 2010). In addition, frogs have sensitive skin that easily absorbs contaminants and chemicals. To mitigate these risks there are several hygiene protocols that must be followed when handling the species and these are outlined below. Because the footprint no longer intersects with GGF habitat or movement corridors, we deemed high level hygiene protocols for vehicle and plant sterilisation unnecessary as there will be no cross contamination of frog habitat. The capture and relocation process is outlined below:

- Latex surgical gloves will be worn at all times when handling any frog.
- Alcohol handwash will be used between the handling of frogs and thoroughly rinsed to avoid the spread of infection between individuals or harming individuals with contaminants and chemicals.
- Animals will be relocated to habitat as close as possible to the section of trench from which they are retrieved.
- Animals will be re-located adjacent to the creek, near an appropriate refuge site, e.g. a reedbed or rock outcrop, in long grass with sufficient cover.
- Animals will be released to a suitable site as soon as practicable after capture.
- Individual animals will be retained in separate clean plastic bags (single use or sterilised between uses) between capture and relocation.

7. Residual impacts and offsets

7.1 Residual Impacts

Based on the findings of targeted surveys and the significant impact assessment undertaken in accordance with the EPBC Act referral guidelines, it is Biosis' position that, following the implementation of avoidance and mitigation measures, the proposed action is unlikely to result in residual significant impacts to any MNES. While the road upgrade and power pole installation will result in the permanent loss of a small area of known SLL habitat within the road reserve, this impact is confined to the southernmost edge of a broader, contiguous population extending into higher-quality habitat to the north. The affected habitat is relatively modified and represents a minor proportion of the population's area of occupancy. An informal vehicle track on the natural soil surface currently exists along the government road reserve. Accordingly, while a localised reduction in habitat extent is acknowledged, the SIC assessments undertaken for the project considers that the scale, context, and intensity of the impact are unlikely to compromise population viability at the local or landscape scale.

Notwithstanding this position, DCCEEW has advised that, in accordance with the EPBC Act referral guidelines, the permanent loss of known habitat supporting an important population constitutes a residual significant impact requiring offsets. In acknowledgement of this position, the proponent has prepared an offset strategy on a contingent basis. The proposed action will result in the permanent removal of 1.255 hectares of SLL habitat. Biosis has undertaken an offset analysis which suggests that an offset site of approximately 5 hectares of suitable SLL habitat would be necessary to address the offset requirements. Details of the offset strategy are discussed further in the following sections. An Offset Management Plan (OMP) will be prepared concurrently providing further details on habitat creation measures, proposed gain, and ongoing management, monitoring and reporting requirements.

7.2 Securing Offsets

As there is suitable available land adjacent to the poultry farm, a first part offset strategy for the proposed action is being developed as the preferred approach. Notwithstanding, negotiations with an offset broker have been initiated to explore third party offset options as a possible alternative.

7.2.1 First-party offset

A potential offset strategy is for ProTen to establish a first-party offset site within the project area that is not being used for the poultry farm or associated infrastructure. Following consultation with DCCEEW, an offset strategy was agreed that involves establishing an offset site to enhance and provide suitable habitat for SLL. A site assessment was undertaken by Biosis to confirm the availability of suitable land within the project area for the establishment of an offset site. The site options are identified in Figure 3, with the area to the north-east of the poultry farm identified as the preferred option due to its reduced exposure to potential operational impacts. Whilst this area was originally assessed as not suitable habitat, the area could be conceivable restored and managed to provide habitat.

Table 10 outlines the approach to establishing the offset site to provide suitable habitat for SLL.

Table 10 Establishment of offset site

Habitat feature or threat	Current state at proposed offset site	Recommended rehabilitation and management methods
Fencing	No fencing	Once defined, the offset site must be fenced off with appropriate predator-proof fencing.
Native grassland vegetation	Negligible native vegetation throughout proposed offset area.	Revegetation of local native grasses and herbs, particularly native tussock-forming grasses.
Weeds and exotic vegetation	High cover of introduced pasture grasses.	Weed control through targeted herbicide application, low-intensity small-scale controlled burning, and revegetation with native grassland species.
Biomass	Varies significantly based on season and grazing intensity. High pasture grass biomass as of January 2026.	Biomass management through low-moderate intensity grazing, low-intensity small-scale controlled burning, and/or mechanical removal (targeted slashing).
Surface rock	Surface rock limited to large scattered and stacked boulders, providing negligible habitat value.	Reintroduction of small surface rocks collected during development works of adjacent area.
Embedded rock	Embedded rock cleared from primary proposed offset area. Large areas of remnant embedded rock throughout secondary potential offset area which would be retained as a habitat feature.	Embedded rock cannot be reintroduced without significant soil disturbance and is not a critical habitat feature for SLL. Embedded rock would not be reintroduced to the primary proposed offset area. Embedded rock would be retained at the secondary proposed offset area.
Soil cracks	Some natural soil cracking in areas supporting clay-based soil may provide SLL habitat. Soil cracks partially degraded through stock (cattle) trampling.	Reduction in stock impacts to increase density of natural soil cacks. Use of smaller or soft-hoofed stock recommended to manage biomass.
Pest predators	The site is subject to pressure from pest predators, including Red Fox and Feral Cat, which may predate on SLL.	Pest control recommended throughout and surrounding offset area, particularly as introduction of chickens to the area may increase local predator abundance.
Significant threats (based on threats outlined in species conservation advice)		
Site currently subject to continuous, intensive grazing by livestock or kangaroos, thereby reducing the floristic and structural complexity of the habitat.	• Impact area – Present • Proposed offset areas – Present Site is currently subject to frequent intensive grazing from cattle.	Seasonal low-impact grazing within the offset area may be utilised to maintain biomass, ensuring a suitably open grassland structure to allow for SLL to bask, and prevent reduction in floristic diversity through loss of bare ground and

Habitat feature or threat	Current state at proposed offset site	Recommended rehabilitation and management methods
Site currently not subject to any form of appropriate biomass reduction (e.g. low–moderate intensity grazing or sympathetic ecological burns to maintain structural and floristic diversity of the habitat.	• Impact area – Present • Proposed offset areas – Present Site is subject to regular high-intensity grazing from cattle, and no ecological burning, limiting appropriate floristic diversity. When cattle are absent, high biomass of weeds causes unsuitable vegetation structure and outcompeted native vegetation.	inter-tussock space. Occasional low-intensity small-scale controlled burns may be conducted to manage weeds and biomass in offset area, and promote establishment of native grassland vegetation.
Site subject to frequent, widespread and intense fires, including deliberate burns that are not sympathetic to the maintenance of Striped Legless Lizard habitat.	• Impact area – Absent • Proposed offset areas – Absent Site is not currently subject to frequent fires or deliberate burns.	
Site subject to historical or ongoing ploughing, pasture improvement and agricultural intensification.	• Impact area – Absent • Proposed offset areas – Present Impact area is occasionally grazed as a means to reduce biomass, but is largely maintained as an access laneway. Proposed offset area subject to introduction of pasture grasses, and potential pasture improvements.	Weed control and revegetation with native tussock-forming grasses will rehabilitate degradation caused by introduction of exotic pasture grasses.
Site subject to historical or ongoing removal of surface and/or embedded or rock.	• Impact area – Present • Proposed offset areas – Present Site has been subject to removal and stacking of surface rock.	Historical surface rock removal will be rectified through reintroduction of surface rock to the offset area, using a variety of small-medium rocks collected during clearing and development works on adjacent land.
Site subject to frequent slashing or thereby reducing the structural complexity of the habitat.	• Impact area – Absent • Proposed offset areas – Absent Site has no clear evidence of regular slashing, and frequent slashing will not be conducted within the proposed offset area. Targeted slashing may be conducted during early stages of site rehabilitation as a form of weed and biomass control and may be required following the reintroduction of native grassland vegetation.	
Site dominated by exotic grasses to the extent that the majority of the site is no longer defined as native vegetation.	• Impact area – Present • Proposed offset areas – Present Impact area has some scattered remnant native vegetation. Proposed offset area has negligible native vegetation and is dominated by exotic pasture grasses.	Weed control (including exotic grasses) and revegetation with local native grasses will aim to prevent dominance of exotic grasses and promote establishment of native vegetation.

EPBC Act Environmental Offsets Policy

In the assessment undertaken, the onsite offset proposal is in accordance with the *EPBC Act Environmental Offsets Policy* (DSEWPC 2012). Table 11 outlines how the proposed strategy aligns with the offsets policy.

Table 11 Alignment with EPBC Offsets Policy

Offset Principle	Offset Strategy Response
1. Deliver an overall conservation outcome that improves or maintains the viability of the aspect of the environment that is protected by national environmental law and affected by the proposed action.	The proposed development will result in the permanent removal of 1.255 hectares of SLL habitat. Therefore, the offset site will be established to provide suitable habitat for SLL including appropriate grassland and refuge features, generating habitat availability for the local SLL population.
2. Be built around direct offsets but may include other compensatory measures.	The proposed offset is a direct offset targeting the same protected matter (SLL) affected by the proposed action. The strategy focuses on habitat establishment and management rather than indirect offset measures.
3. Be in proportion to the level of statutory protection that applies to the protected matter.	SLL is listed as Vulnerable under the EPBC Act. The scale and nature of the offset response have been designed to reflect this level of protection, with a focus on improving habitat values relevant to the species' ecology within the local landscape context.
4. Be of a size and scale proportionate to the residual impacts on the protected matter.	The offset site exceeds the area of permanent habitat removal associated with the proposed action. This scale accounts for the residual loss of approximately 1.255 hectares of SLL habitat and provides a buffer against time lags and establishment risk.
5. Effectively account for and manage the risks of the offset not succeeding.	Risks to offset establishment will be managed through targeted site management actions including ongoing weed and biomass control and adaptive management informed by monitoring outcomes.
6. Be additional to what is already required, determined by law or planning regulations or agreed to under other schemes or programs (this does not preclude the recognition of state or territory offsets that may be suitable as offsets under the EPBC Act for the same action).	The offset site is located outside of areas required to be retained or managed under existing approvals or regulatory obligations. The proposed offset site areas are not considered avoidance areas due to not currently providing habitat for the species. Offset actions represent additional conservation outcomes beyond baseline land management requirements.
7. Be efficient, effective, timely, transparent, scientifically robust and reasonable.	The offset strategy is achievable within the project landholding, avoids reliance on third-party offsets, and is informed by ecological assessments. Establishment actions target known habitat requirements of SLL, supporting a practical and scientifically defensible approach.
8. Have transparent governance arrangements including being able to be readily measured, monitored, audited and enforced.	The offset site will be secured under an appropriate legal mechanism. It will be subject to a defined management framework, with performance measures, monitoring and

Offset Principle	Offset Strategy Response
	reporting requirements to be finalised in consultation with DCCEEW. This will enable tracking of establishment success and compliance over time.
9. Be informed by scientifically robust information and incorporate the precautionary principle in the absence of scientific certainty.	Offset design is informed by habitat assessments and an informed understanding of the species' habitat requirements. The offset site size has been conservatively established to provide a margin of ecological benefit and manage uncertainty.
10. Conducted in a consistent and transparent manner.	The offset strategy has been developed following consultation with DCCEEW and is documented within this Preliminary Documentation. A more detailed Offset Management Plan will be prepared, ensuring transparency in how policy principles are being applied and implemented.

EPBC Act Offsets Assessment Guide

A key input to the Offset Assessment Guide is habitat quality which reflects how effectively a site supports a threatened species or ecological community and contributes to its long-term viability. Habitat quality is derived from three related components:

- Site condition – considers how well the site meets the ecological requirements of the species or community, including vegetation structure, habitat diversity, and the presence of key habitat features.
- Site context – reflects the importance of the site within the broader landscape, including connectivity, proximity to other suitable habitat, and its role in supporting population persistence.
- Species stocking rate – accounts for the level of use or density of a species at a site and recognises that habitat value cannot always be inferred from site condition or landscape context alone.

These components are combined to generate an overall habitat quality score, with the relative weighting of each component tailored to the ecological requirements of the impacted species or ecological community. This approach ensures that the scoring system reflects species-specific ecology rather than relying on vegetation condition, providing a robust justification for the proposed first party offset strategy.

The parameters used in the Offsets Assessment Guide resulting in the offset determination are detailed Table 12 below.

Table 12 *Delma Impar* scoring system

Parameter	Scoring system
Site condition (max 3 points)	• 1/3 = Poor – Site (on average) supports a species-poor ground flora with low structural complexity (reflecting inadequate biomass management). Dominated by a few native or predominantly introduced tussock-forming grasses with no or very few native forbs with or without embedded and/or surface rock. • 2/3 = Satisfactory – Site (on average) supports a moderately diverse ground flora with good structural complexity (reflecting some biomass management). Dominated by an average diversity of native tussock-forming grasses and average diversity of native forbs with or without embedded and/or surface rock.

Parameter	Scoring system
	• 3/3 = Good – Site (on average) supports a species-rich and structurally complex ground flora (reflecting appropriate biomass management). Dominated by an above average diversity of native tussock-forming grasses and above average native forbs, together with embedded and/or surface rock.
Site context (max 4 points)	**Site connectivity** • 1/2 = Site less than 0.5 ha • 2/2 = Site equal to or greater than 0.5 ha **Threats present** • 0/2 = Site subject to 5 or more of the threats listed in the species conservation advice. • 1/2 = Site subject to between 1 and 4 of the threats listed in the species conservation advice. • 2/2 = Site subject to none of the threats listed in the species conservation advice.
Species stocking rate (max 3 points)	• 1/3 = One individual or slough encountered in the tile grid during targeted surveys • 2/3 = Two individuals or sloughs encountered in the tile grid during targeted surveys • 3/3 = Three or more individuals or sloughs encountered in the tile grid during targeted surveys

Table 13 applies the scoring system to the proposed offset sites to generate the required offset site area.

Table 13 *Delma Impar* offset scoring inputs

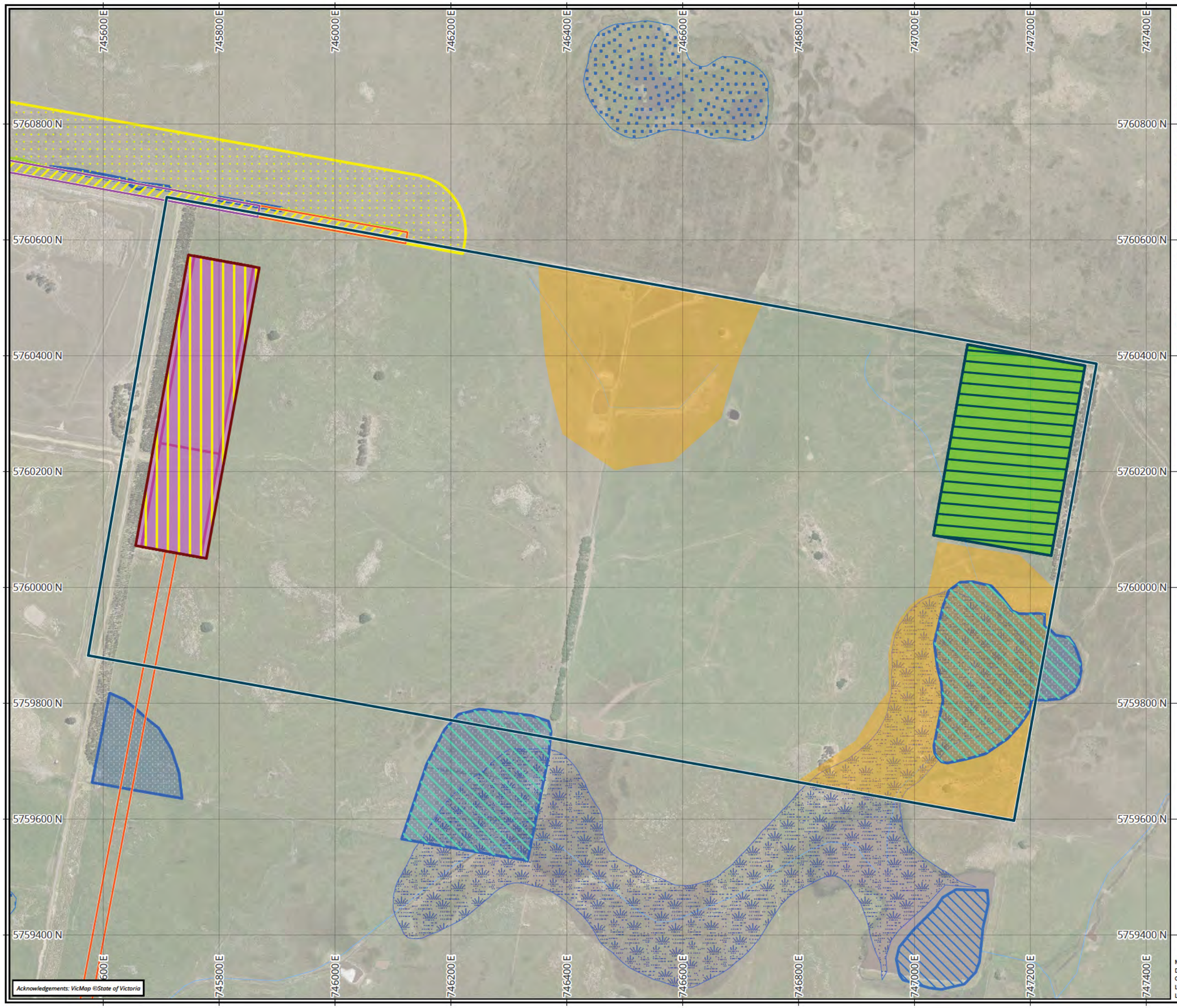
Parameter	Input	Justification for input
Impact area		
Impact area size	1.26 ha	The site supports 2.43 hectares of SLL habitat, approximately 1.26 hectares of SLL habitat will be permanently impacted by the proposed action as shown in Figure 2. The total impact area has been rounded up from 1.255 to 1.26 for input into the offset calculator.
Impact area habitat quality	7/10	• A **site condition** score of 1/3 as the area is dominated by exotic grasses with a low proportion of native species and negligible native tussock-forming grasses. Some scattered patched of surface rock remain. • A **site context** score of 3/4 based on a connectivity score of 2/2 because the total area of contiguous habitat is more than 0.5 ha, and a threat score of 1/2 because the site is subject to four of the proposed threats identified in the conservation advice (Table 10) • A **species stocking rate** score of 3/3 as three or more individuals were recorded within the impact area during targeted surveys.
Proposed offset area		
Time over which loss is averted	20 years	The OMP will require active conservation management (and improvements) for the first 10 years, after which the offset areas are to be managed and maintained as a conservation area in perpetuity. However, 20 years is the maximum value that can be entered into the Offsets Assessment Guide.
Risk of loss without offset	0%	Risk of loss at a species-level or local population level with or without the proposed offset is considered to be 0%. Assessed with guidance for deriving 'Risk of Loss'

Parameter	Input	Justification for input
Risk of loss with offset	0%	estimates when evaluating biodiversity offset proposals under the EPBC Act (Maseyk et al. 2017).
Confidence in result – risk of loss	90%	A 90% confidence reflects that there is a high degree of confidence that there is no (0%) risk that the species will be lost, with or without an offset in place. - **NOTE:** As 0% risk of loss with/without offset has been input, the confidence in result (risk of loss) parameter does not influence the final offset calculation output.
Start habitat quality score	4/10	• A **site condition** score of 1/3 as the area supports a species-poor ground flora with low structural complexity (reflecting inadequate biomass management). Dominated by predominantly introduced grasses with negligible native grassland vegetation and tussock-forming grasses. • A **site context** score of 2/4 based on a connectivity score of 2/2 because the total area is more than 0.5 ha, and a threat score of 0/2 because the site is subject to five of the proposed threats identified in the conservation advice (Table 10) • A **species stocking rate** score of 1/3 as a precautionary approach as while the proposed offset area is currently degraded and unlikely to support a permanent population, the species is known to be present in nearby habitat and may utilise the proposed offset area occasionally. The above scoring related to both offset site options.
Future habitat quality without offset	4/10	The proposed offset area has been managed in its current condition for an extended period and is not expected to degrade further with the current land-use.
Future habitat quality with offset	Minimum 6/10	Active management as an offset has the potential to significantly improve habitat condition for SLL. Active control measures will be put in place to reduce weed cover, maintain suitable biomass, increase proportion and variety of native grassland vegetation and reduce threats. Management as an offset site and increase in habitat condition is also likely to lead to an increase in the species use of the area, and subsequent stocking rate score. The proposed minimum 2-point gain will result from at least two of the following: • A 1-point increase in **site condition** score of from 1/3 to 2/3. A measurable increase in the proposition of native tussock-forming grasses and herbs through revegetation, biomass control, and weed control. • A 1-point increase in **site context** score from 2/4 to 3/4. Maintaining a connectivity score of 2/2 because the total area of contiguous habitat will be greater than 0.5 ha, and, and an improved threat score from 0/2 to 1/2 through elimination of a minimum of one identified threat. • A 1-point increase in **species stocking rate** score of 1/3 to 2/3. The improvements to site condition and reduction in threats is expected to result in increased use of the offset area by SLL, and the establishment of a viable long-term population.
Confidence in result –	90%	A 90% confidence reflects that there is a high degree of confidence in the proposed ecological benefit, considering that the proposed habitat quality gains will be achieved through direct habitat improvement and threat reduction, as well as likely resulting increases to species stocking rate. The high confidence also reflects the potential for a

Parameter	Input	Justification for input
ecological benefit		gain in habitat quality in excess of the minimum 2-points required to offset 100% of the impact offsets.
Time until ecological benefit	20 years	As a precautionary approach to increase confidence in results of ecological benefit, time until measurable ecological benefit has been set at 20 years, however, it is expected that measurable ecological benefit and threat reduction could be seen in as little as five years.
Start offset area	5.2 ha	Using the developed scoring protocol, it was established that to achieve 100% of the direct impact offset requirement, an area of 5.2 ha would be required. For the purposes of offset calculations, it was assumed that a minimum of 5.2 ha of land will be available as an offset. Two potential areas of at least 5.2 ha have been identified within the site (see Figure 3). The primary proposed area is situated within the north-east extent of the site, away from access tracks. The secondary proposed area is situated along the western edge of the site, between the western boundary fence and the proposed development area. The north-east corner area was identified as the most suitable as it has the maximum connectivity to adjacent grassland habitat and is situated furthest from proposed operational infrastructure and tree plantings.
Percentage of impact offset	101.97% of direct impacts will be offset through the above inputs with the proposed minimum of 2-point gain in habitat quality. If a 3-point gain is achieved, 152.95% of the direct impacts will be achieved.	

7.2.2 Third party offset

Preliminary discussions with an offset broker have confirmed availability of suitable third party offsets. Should a first party offset strategy be deemed unacceptable, there remains scope to continue discussions regarding third-party options.



Legend

- Primary offset option
- Secondary offset option

Project area

- Poultry farm
- Road development
- Pipeline
- Area of cultural heritage sensitivity

Threatened fauna habitat

- Striped Legless Lizard
- Striped Legless Lizard (unsurveyed potential habitat)

Native vegetation

EPBC listed threatened ecological communities

Hab Zone (unique ID for each veg patch)

- Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains

Ecological vegetation classes (EVCs)

- 125 Plains Grassy Wetland
- Scattered native vegetation including Basalt Poa. However, not considered native vegetation in the Guidelines.

Figure 3 First-party offset site options

0 50 100 150 200 250

Metres

Scale: 1:6,000 @ A3

Coordinate System: GDA2020 MGA Zone 54

N

biosis

APEM Group

Matter: 43967,
Date: 30 January 2026,
Checked by: CK, Drawn by: SKM, Last edited by: smitchell
Layout: 43957_F3_Offsets
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8. Unexpected threatened species procedure

A list of threatened species that have the potential to occur within the project area and their likelihood of occurrence can be seen in Appendix A and B of the Poultry Farm assessment (Biosis 2023) and Appendix A and B of the water pipeline and proposed all-weather road assessment (Biosis 2024a). ProTen have previously been issued copies of these reports. The below procedure outlines the required action to be taken by ProTen in the event threatened fauna are unexpectedly found on site during works.

Unexpected threatened species discovered

- Immediately stop all work within the current works zone.
- Immediately notify the ProTen project environment officer and contact the project ecologist.
- Seek advice from the ecologist.

The ecologist will then need to make an assessment of discovered species for identification to species level. ProTen should consult with the Biosis about the following:

- The procedure for dealing with the threatened species, with reference to the Conservation Advice for the relevant threatened species (if available).
- Any relevant legislative implication (i.e. under the *Wildlife Act 1975)* of the discovery.
- Recommencement of works.

Works should not recommence until the ProTen ensures:

- All required permits and/or approvals are obtained.
- Any newly required mitigation measures as a result of the discovery of the threatened species are in place.
- All plans, mapping and induction materials are updated to include the details of the unexpected threatened species.

9. Reporting

9.1 Salvage report

All fauna encountered as a result of the clearing works will be recorded by the ecologist. Relevant details to be documented will include:

- Species encountered
- Date/time of salvage
- Location of animal when encountered (description and coordinates)
- Method of capture (if applicable)
- Any injuries noted
- Details of any veterinary care required
- Details of the wildlife carer (if applicable)
- Method of euthanasia (if applicable)
- Date/time of release
- Location of release site (description and coordinates).

A compliance report will be prepared by the ecologist and submitted to ProTen and kept on file based on the staging of the works and fauna salvage required. The report will summarise the fauna salvage and release operation and provide the details as documented above. If requested, the report will be made available to DCCEEEW.

The data recorded during the project will be entered into the Victorian Biodiversity Atlas, in accordance with the requirements of the Research Permit/Management Authorisation.

Any rare or threatened species encountered during the salvage works that is listed under the EPBC Act will be reported to DCCEEEW at the earliest convenience.

9.2 Post works rehabilitation report

An ecologist supervised report will be prepared following the completion of construction that confirms:

- The satisfactory removal of all temporary mitigation measures and install of any permanent measures outlined in the above report
- The success or otherwise of habitat restoration measures, to be informed by at least two monitoring inspections carried out within the first- and second-year post construction.
- An outline of any adaptive management measures that should be undertaken in the event that unexpected impacts should have occurred.

If requested, the report will be made available to DCCEEW.

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Appendices

Appendix 1 General fauna salvage protocols

All native fauna is protected by law under the *Wildlife Act 1975*. Permits and authorisations are required to handle and manage native fauna. Only qualified, experienced and authorised personnel are to handle and relocate native fauna. A summary of general fauna salvage protocols is provided below:

- A Wildlife Management Authorisation is required from DEECA to capture and relocate fauna affected by habitat removal works.
- A qualified, experienced, and authorised ecologist should be engaged under the protocol to monitor fauna habitat removal and undertake fauna salvage and translocation as required.
- Contractor induction must be provided and is to include relevant sections of the protocol and other fauna management issues and obligations under the job specific Environmental Management Plan, the Wildlife Act and/or as required by DEECA, to not interfere with or harm fauna.
- All potential fauna habitat (e.g. nests) should be identified prior to removal. Fauna habitat trees/vegetation should be marked "H" with paint. Other potential fauna habitat should be marked with appropriate flagging tape. This should be undertaken in advance of habitat removal during a pre-clearance survey.
- On the day of habitat removal, the ecologist should inspect the area for any fauna that may be impacted.
- All fauna observed, captured, relocated, injured or killed during the habitat removal phase of the project must be recorded by the ecologist. The following data should be recorded; date, species, sex (if known), location of observation (easting/northings), location of release site (including any nest boxes installed; easting/northings), notes regarding deposit of fauna to veterinarian or wildlife shelter and any other relevant notes. This data is to be supplied to DEECA's Victorian Biodiversity Atlas database by the ecologist.
- Relocation of fauna should be in line with requirements set out in a site-specific Environmental Management Plan (EMP) or advice from regulatory departments when provided. All fauna to be relocated will be moved into adjacent suitable habitat as close as practical to the point of capture. Usually this is within 50 metres of the capture location, but no more than 150 metres unless authorised by DEECA.
- Depending on the fauna encountered during construction and/or vegetation removal when fauna may become evident, the ecologist will determine if capture and relocation is warranted, based on the best interests (animal welfare interests) of the animal concerned.
- For any threatened species that are encountered, advice from the DEECA should be sought prior to relocation. Works may need to cease, pending advice from DEECA.
- If the ecologist determines that construction or tree removal is to cease so that fauna may be safely captured and relocated, the ecologist is to liaise with the site manager and/or the appropriate contractor(s).
- Fauna are to be captured by the ecologist either by hand, nets, capture poles, capture bags, blankets or towels. Captured fauna must immediately be covered and/or placed into a suitable container, to reduce stress and the risk of escape.

- Once a tree or section of tree of interest is on the ground, the ecologist should inspect hollows, loose bark, fissures and nests for fauna. If fauna is found, when practicable, the tree should be left overnight to allow the animals to disperse of their own accord. If trees containing fauna cannot be left overnight, then the entire tree or limb containing the hollow should be moved to a suitable location where it can be left overnight. Care should be taken to prevent the animal attempting to escape while the tree or limb is being transported, this can be achieved by blocking the entrance with a hessian sack or other suitable fabric. Only under circumstances where this is not achievable should the ecologist attempt to extract the animal from the hollow. This may require cutting the entrance of the hollow with a chainsaw. Extreme care is advised. If a chainsaw must be used to increase the entrance size, it is strongly recommended that a suitable plug (for example, several scrunched-up cloth capture bags or towels), be placed between the animal and the chainsaw. Care must be taken not to injure the animal during the extraction process. Firm but gentle pressure should be applied, to encourage the animal from the hollow. The use of an inverted cloth capture bag is recommended if appropriate to the circumstance, so that when the animal is extracted, the bag can be pulled over the animal immediately.
- If nocturnal fauna are required to be kept during the day, they will be kept in either standard pet carrying cages or ventilated cardboard/plastic animal boxes, or cloth capture bags. Captive fauna will generally be kept in ambient temperature and shaded conditions to avoid any heat stress. Water will be provided if necessary. Injured fauna may require external heat. The ecologist is to regularly monitor captive fauna for signs of distress.
- If juvenile fauna is displaced and cannot be re-united with its parent(s), orphaned fauna must be deposited with an authorised wildlife shelter within the region for hand rearing.
- In the event that fauna is injured during construction, the removal of trees or during hand capture, the animal should initially be assessed, and first aid rendered by an experienced ecologist and subsequently taken to a veterinarian for further assessment and treatment and if necessary, euthanasia. DEECA must be advised of any euthanised wildlife should they wish to obtain the body.
- After consultation with the veterinarian, injured fauna that requires recuperation and thus is unable to be immediately released must be deposited with an authorised wildlife shelter. Upon successful recuperation and rehabilitation, the animal is to be released into suitable habitat as close as is practical to the point of original capture.
- Fauna killed by the works will be handled as specified in the relevant Wildlife Act Permit.
- At all times, the welfare of individual animals must be of utmost concern to all involved in the protocol.
- A severely injured animal (for example, deep cut with exposed organs, bone fracture, protruding bone etc.) may require euthanasia. It is preferable to take animals to a veterinarian for euthanasia, however, at times this may not be possible, practical or in the best interests of the animal (i.e. prolonged suffering). In these cases, it may be necessary to undertake euthanasia in the field. The method of euthanasia should be suited to the size of the animal. In general, a sharp and forceful blow to the head with a blunt object (e.g. hammer) to cause instantaneous death is considered to be humane. Only experienced and authorised ecologists are to perform euthanasia in the field.

Appendix 2 Wildlife carers and veterinary clinics

A3.1 Wildlife shelters and wildlife rescuers around Birregurra

The following are wildlife shelters in the local area. Prior to clearing, ProTen or the ecologist should make arrangements for shelters/carers to receive sick, injured or orphaned wildlife.

Name	Type	Location	Number
Winchelsea Wildlife Shelter	Rescue and shelter	55 Harding St, Winchelsea VIC 3241	0439566129
Bannockburn Wildlife Rescue	Rescue	19 Blacker Way, Bannockburn VIC 3331	0430212653
Help for Wildlife	Rescue	PO Box 49, Doreen VIC 3754	0477 555 611
Wildlife Victoria	Rescue	Victoria	136 186

A3.2 Vets located around Birregurra

Vets should be contacted by ProTen contractors or the ecologist prior to clearing to make arrangements to receive sick, injured or orphaned wildlife. It is important that the ecologist keep records of which animals have been received from the clearing works footprint and which wildlife shelter they have been passed onto. Transporter is to leave their details and contact details of ecologist with the vet.

Name	Location	Number	Additional details
Winchelsea Veterinary Hospital	27-31 Willis St, Winchelsea VIC 3241	(03) 4218 6804	Closed Saturday and Sunday
Colac Veterinary Clinic	38 Skene St, Colac VIC 3250	(03) 5232 1792	Closed Sunday
Rhodes Veterinary Clinic	74 Gellibrand St, Colac VIC 3250	(03) 5232 2111	Closed Sunday
Murray Street Veterinary Clinic & Hospital	330 Murray St, Colac VIC 3250	(03) 5231 3375	Closed Sunday

Appendix 3 Economic and social impacts

ProTen's Environmental Management and Climate Transition Policy

ProTen is committed to adopting a best-practice approach to environmental protection and sustainability and embedding this across project planning, construction, and ongoing operations. ProTen commits to meeting all applicable legislative and regulatory requirements and recognises the importance of maintaining its social licence to operate through proactive engagement with regulators, industry, and the community. Environmental risks are identified early and managed through the preparation and diligent implementation of Environmental Management Plans, supported by routine site inspections, monitoring, auditing, and corrective action processes. This framework emphasises continuous improvement, incident response and reporting, waste minimisation, pollution prevention, protection of heritage values, and transparent complaint handling.

ProTen's corporate approach also explicitly integrates climate change considerations into decision-making. The company has adopted a Board-endorsed Climate Transition Plan targeting a 45% reduction in Scope 1 and 2 emissions intensity by FY2030 and net zero emissions by 2050. Environmental performance is monitored through formal management systems and reporting mechanisms, including the use of NGERS data, with ongoing consideration given to energy efficiency, renewable energy, water efficiency, and low-carbon materials and technologies in new developments and upgrades. Together, these policies and procedures demonstrate ProTen's commitment to environmentally responsible development, operational accountability, and long-term sustainability outcomes.

Economic costs and benefits

The proposed Birregurra-Ombersley Poultry Farm will deliver measurable economic benefits at both the regional and broader supply-chain level. The project will support employment during construction and operation, contribute to local procurement and services, and form part of Australia's domestic food production network through modern, efficient poultry infrastructure. The development aligns with ProTen's established operating model, which supports long-term regional investment, stable employment, and secure processor supply arrangements, contributing to economic resilience in south-western Victoria.

The project will deliver the following:

- 40 – 50 jobs during construction with a commitment to use local contractors where possible.
- Approximately 12 ongoing operational jobs, including on-site management.
- Approximately $1.5 million per annum in local expenditure on trades, services, and suppliers.
- Contribution to ProTen's national operations as Australia's largest contract broiler grower, producing approximately 160 million chickens per year (around 23% of the national market) under long-term processor contracts.

The identification of suitable sites for poultry farm development in this part of Victoria is constrained by a combination of operational, environmental, and social factors. A viable site must be located within 1.5–2 hours of a processing facility, have reliable access to water and power, suitable topography, appropriate separation distances from sensitive receptors, and safe access for heavy vehicles. A number of alternative sites within the region were investigated but were not pursued due to environmental and land-use constraints, including cultural heritage considerations, the presence of native grasslands, and proximity to

existing receptors. In this context, the selected site represents a practical balance between operational feasibility, economic benefit, and the minimisation of environmental and social impacts.

Consultation activities

An extensive community and stakeholder consultation program has been undertaken for the project. Table 1 below details these activities and outcomes.

Table 1 Consultation activities

Date of consultation	Stakeholders	Comments
March 2023 10 July 2024 24 July 2024 30 July 2024 28 August 2024	Colac-Otway Shire	• Initial pre-application meeting to introduce the project, discuss permit requirements, environmental matters and community engagement expectations. • Ongoing meetings to discuss design changes, community feedback and statutory requirements.
May 2023	Barwon Water	• Discussion of water supply options, pipeline feasibility and infrastructure upgrades. • Multiple follow up meetings occurred throughout 2023 – 2025.
June 2023	Vic Roads	• Discussion of traffic impacts, heavy vehicle movements and intersection safety requirements.
29 August 2023	Birregurra local community	• Public information drop-in session held at Birregurra Town Hall. • Provided early opportunity for local residents to review the proposed development, ask questions and raise concerns.
October 2023	Corangamite Catchment Management Authority (CCMA)	• Multiple meetings held to discuss landscape hydrology, catchment constraints, native vegetation and waterway protection.
October 2023	Environmental Protection Authority (EPA)	• Discussion on emissions modelling, regulatory thresholds and expectations for further modelling refinement.
April 2024	Eastern Maar Aboriginal Corporation	• Discussion regarding CHMP requirements, artefact sensitivity, and avoidance strategies.
May 2024	Objectors meeting	• Direct engagement with individuals who had lodged objections to the project. • Addressed concerns relating to amenity, environmental impacts and project transparency.
2024	1-2-1 local resident meetings	• Multiple meetings with local community members throughout 2024 to address concerns relating to odour, noise, traffic, native vegetation and groundwater.

Date of consultation	Stakeholders	Comments
September 2024	VCAT proceedings	• Participation in planning appeals process, providing expert clarification on environmental matters, amenity and traffic.
August 2025	DCCEEW	• Pre-referral meeting held with DCCEEW to discuss EPBC referral requirements, flora and fauna surveys and expectations for preliminary documentation.

Monitoring social and economic outcomes

Given the scale and rural context of the proposed development, significant long-term adverse social or economic impacts are not anticipated. However, ProTen has existing systems in place to monitor and respond to any ongoing social or economic effects associated with the project.

ProTen maintains a publicly available hotline (1300 number) which is displayed on the company website and at farm entrances, connecting the caller directly to the Environment Manager. This provides a direct mechanism for community members to raise concerns or provide feedback at any time.

A complaints register and formal process are maintained for all operational sites. All complaints are recorded and investigated, and where contact details are provided, the complainant is contacted directly with a response. The complaints management framework is typically documented within site-specific environmental management plans (which will be prepared for this project) which outlines procedures for recording, investigating, and responding to community concerns.

These mechanisms provide an ongoing basis for monitoring social and amenity-related effects e.g. traffic, noise, odour, and allow for responsive management where issues are identified. Complaint trends and outcomes are reviewed by site management and used to inform operational practices and continuous improvement.

Appendix 4 National Strategy for Ecologically Sustainable Development

Australia's National Strategy for Ecologically Sustainable Development (1992) defines ecologically sustainable development as: 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased'.

Section 3 of the EPBC Act outlines the objects of Act and includes "to promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources".

Section 3A of the EPBC Act goes on to outline the following ESD principles:

- Decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations (the 'integration principle').
- If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation (the 'precautionary principle').
- The principle of inter-generational equity – that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations (the 'intergenerational principle').
- The conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making (the 'biodiversity principle').
- Improved valuation, pricing and incentive mechanisms should be promoted (the 'valuation principle').

Extensive planning, site investigations, and environmental assessments have informed the development of the Birregurra–Ombersley Poultry Farm to ensure that decision-making integrates environmental, social, and economic considerations in accordance with the integration and precautionary principles. The project has been designed to operate on previously cleared agricultural land, with avoidance of areas of higher ecological value, including threatened ecological communities, wetlands, and waterways. Where potential impacts to Matters of National Environmental Significance cannot be entirely avoided, detailed surveys, avoidance measures, and mitigation protocols have been applied to minimise impacts and reduce uncertainty in the assessment of residual effects.

The proposed development will deliver a modern free-range broiler poultry facility that supports regional economic activity through construction and ongoing employment, while incorporating contemporary environmental management practices. These include erosion and sediment controls, water quality protection, avoidance of hydrological impacts to nearby wetlands and Birregurra Creek, and implementation of fauna protection measures during construction. The project aligns with ProTen's commitment to continuous improvement in environmental performance, increased water and energy efficiency, reduced emissions intensity, and long-term climate resilience across its operations. The poultry farm design and operational framework reflect these commitments, contributing to sustainable food production while maintaining environmental safeguards.

Consistent with the biodiversity and intergenerational equity principles, the Proponent has prioritised the conservation of biological diversity through avoidance, minimisation, and management measures, supported by targeted surveys and adaptive management. While the Proponent maintains that residual significant impacts to MNES are unlikely following mitigation, an offset strategy has been prepared on a contingent basis

and will be implemented if required under the EPBC Act approval framework. This approach ensures that any unavoidable impacts are appropriately compensated, maintaining ecological values for future generations while enabling the sustainable operation of the poultry farm.


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