

EPBC Act referral 2015/7516
Lindum Vale Residential Development,
Mickleham Road, Mickleham:

Offset Management Plan for Golden Sun Moth habitat:

235 Muncktons Lane, Glenaroua, Victoria

Prepared for Satterley Property Group

12 June 2020

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Declaration of accuracy

**Lindum Vale Residential Development Project, Mickleham Road, Mickleham,
Victoria
EPBC 2015/7516**

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.

Signed

Stephen Mueck
Senior Consultant Botanist
Biosis Pty Ltd
12/05/2020

Summary

Biosis Pty Ltd was commissioned by Satterley Property Group (SPG) to prepare an Offset Management Plan (OMP) for the Lindum Vale Residential Development Project (LVRD), Mickleham Road, Victoria. The LVRD was declared a controlled action under the EPBC Act and will be assessed via preliminary documentation.

The purpose of this OMP is to describe how SPG will compensate for residual impacts on 97.05 hectares Golden Sun Moth *Synemon plana* habitat by providing Environmental Offsets under in accordance with the requirements of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and the EPBC Act Environmental Offsets Policy. In summary, these conditions will be met in part by securing for conservation and improving the condition of 296.1 hectares of GSM habitat within third party offset areas. Offsets have been secured at 235 Muncktons Lane, Glenaroua (121.0 hectares), Sievers Lane, Glenhope (37.9 hectares) and 5066 Western Highway, Beaufort (137.2 hectares). This, in conjunction with the on-site Conservation Reserve (7.2 ha) provides a total of 303.3 hectares of secured GSM habitat which is just over the required 300.5 hectares.

The specific objectives for the Offset area result from the inputs into and the outputs from the Offsets Assessment Guide. The specific objectives form the basis of the management commitments that the Landholder has agreed to when reviewing earlier versions of this OMP. The management commitments will be implemented on the ground using defined management actions that are practical and feasible within an agricultural context. Each of the individual management actions will have a management target based on maintenance or improvement of the current condition of the Offset area.

The specific objectives of the Offset area will be assessed using the following key performance indicators:

- Permanent legal protection of 121.0 ha of GSM habitat via Trust for Nature (TfN) covenant.
- Permanent exclusion of all agricultural practices except as described in this OMP.
- Completion of the 10-year program of intensive management, including monitoring and reporting.
- Improving the Quality of GSM habitat from 5 (out of 10) to 6 (out of 10).
- Annual works plan in place for on-going management actions from Year 11 onwards.

The broad approach of the management actions is to produce a decrease in the abundance of perennial weeds and maintain open grassland conditions that are suitable for the recruitment (seed production, germination and growth) of native plant species. While decreasing weed cover is an improvement in itself, it is anticipated that this will be accompanied by a commensurate increase in the abundance of native grasses and herbs. The increased abundance of native grasses will also improve food availability for GSM.

A risk assessment has been undertaken to address potential threats to the success of the Offset area. Surveillance of the Offset area is an integral component of risk management for the Offset area and includes both routine inspections by the Landholder and ecological monitoring by a qualified ecologist. These activities allow for early identification of changes, appropriate and timely management responses, and adaptive management to changing conditions. Regular reporting to regulatory bodies will track the improvement of the Offset area over time.

Schedules for management actions, monitoring and reporting are provided at the end of this document. The table on the following page summarises the OMP specific objectives, key performance indicators (KPIs) and management actions to be implemented according to the details in this OMP.

Summary Table Specific objectives, KPIs and management actions

Specific objective	Offsets Assessment Guide	KPI / Measureable target	Management actions		
			Upon commencement	Year 1 to Year 10	Year 11 onwards
Offset area protection (security)	Provide 121.0 ha Offset area	On-title protection via Trust for Nature covenant	Register Trust for Nature covenant on-title		
Offset area protection (threat abatement)	Risk of loss reduced from 10% to 1%	<ul style="list-style-type: none"> No loss of GSM habitat or preventable weed introductions over 20 year time horizon of OMP No unauthorised access or unapproved works within offset area 	Exclude all agricultural practices except those in accordance with OMP	Routine inspections and maintenance of: <ul style="list-style-type: none"> Fencing Signage and access 	Routine inspections and maintenance of: <ul style="list-style-type: none"> Fencing Information and access
Offset area improvement	Quality score of GSM habitat improved from 5/10 to 6/10.	<ul style="list-style-type: none"> Average Habitat hectare Site score improves by at least 10 points for GSM habitat GSM stocking rate is maintained or improved 	Conversion from passive management to active management: <ul style="list-style-type: none"> Signage & markers Convert to active weed control Install monitoring plots 	Intensive program of management actions for: <ul style="list-style-type: none"> Weeds Pest animals Biomass & organic litter Routine inspections by Landholder and Trust for Nature. Ecological monitoring of GSM 	
Offset area maintenance	Quality score achieved at the end of Year 10 maintained from Year 11 onwards	Habitat Hectares score and GSM stocking rate achieved at the end of Year 10 maintained			Maintenance of Year-10 condition with annual works plan for: <ul style="list-style-type: none"> Weeds Pest animals Biomass & organic litter Routine inspections by Landholder and Trust for Nature

Structure of this document

The structure and content of the Offset Management Plan (OMP) is organised as follows: Sections 1 and 2 are aimed at technical professionals at DAWE, SPG, and ecologists undertaking monitoring of the Offset area; meanwhile, Sections 3, 4 and 5 are also aimed at the Landholder who will implement the OMP as well as technical professionals. Appendix 1 contains the detailed schedule of management actions, including monitoring and reporting, to enable implementation of the OMP.

1. Introduction: summarises the background information leading up to the requirement for this OMP, including the purpose and scope of the OMP and who is responsible for its implementation.
2. Offset area description: provides information about the property on which the offset is located and describes the Offset area itself. This section also defines the specific objectives as they arise from the Offset Assessment Guide, rather than detailed management targets.
3. Specific management actions: details the management actions to achieve the specific objectives of the OMP including weed, pest and biomass control targets.
4. Monitoring actions: describes how the progress of the Offset area will be tracked over the 10 year timeframe to achieve the specific objectives.
5. Risk assessment and adaptive management: details how management of the Offset area will adapt to changes conditions, the results of monitoring and any unforeseen events or Incidents.
6. Appendices: provides schedule for management actions and background information.

For common terms, a list of terms and their definitions is provided on the following page. A glossary of technical terms used throughout this OMP is provided in Appendix 5.

Definition of terms

The following terms are taken from previous EPBC Act approval documents:

Credit Trading Agreement means a legal agreement between the approval holder, Trust for Nature (TfN) and the owner of the Offset area to outline the arrangements for the Offset area in accordance with the Offset Management Plan.

Conservation covenant means a binding agreement registered on the title of the property that provides enduring protection of the environmental values of the property.

Environmental services means services including: (i) entering into and registering a conservation covenant over the Offset area; and, (ii) managing the Offset area in accordance with the Offset Management Plan.

EPBC Act Environmental Offsets Policy means the *Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy*, October 2013 or any document published by the Australian Government which supersedes this document.

Golden Sun Moth or **GSM** means the EPBC Act listed threatened species *Synemon plana*.

Golden Sun Moth habitat or **GSM habitat** means the habitat for the Golden Sun Moth as defined in the species approved conservation advice.

Incident means any event which has the potential to, or does, impact on protected matter(s).

Independent audit(s): means an audit conducted by an independent and suitably qualified person as detailed in the *Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines* (2015).

Monitoring data means the data required to be recorded under the conditions of this approval.

Offset area means the area of land to be secured and managed for Golden Sun Moth habitat.

Offset Management Plan or **OMP** means the document outlining the management and protection of the Offset area, or any subsequent version approved by the Minister under section 143A of the EPBC Act.

Preliminary Documentation means the document titled *Lindum Vale Residential Development, Mickleham Road Mickleham, Victoria: Preliminary Documentation (EPBC 2015/7516)*.

Protected matter(s) means a matter protected under a controlling provision in Part 3 of the EPBC Act for which this approval has effect.

Suitably qualified person means a person who has professional qualifications, training, skills and/or experience related to the nominated subject matter and can give authoritative independent assessment, advice and analysis on performance relative to the subject matter using the relevant protocols, standards, methods and/or literature.

Trust for Nature (TfN) means the Victorian based not-for-profit organisation working to protect native plants and wildlife in cooperation with private landowners (ABN: 60 292 993 543).

The following terms are defined below for use in this OMP:

Key performance indicator or **KPI** means a measureable change that provides evidence that the Offset area has achieved/is progressing towards achieving the specific objectives.

Management commitment(s) means the overall changes to land management practices that will be undertaken by the Landholder within the Offset area.

Management action(s) means the works that will be undertaken within the Offset area to improve and maintain GSM habitat within the Offset area.

Management target means a measureable change that provides evidence that the management action has achieved/is progressing towards achieving the improvement in GSM habitat.

Quality means the score out of 10 used in the Offset Assessment Guide to define the conservation values present within an area of Listed threatened species habitat or ecological community.

Specific objectives means the requirements for the performance of the Offset area as defined by the Offsets Assessment Guide.

The following list of the entities are referred to in this document:

Satterley Property Group (SPG) is the proponent applying for approval.

Department of Agriculture, Water and Environment (DAWE) means the Commonwealth Government department responsible for the Environment *Protection and Biodiversity Conservation Act 1999* (EPBC Act). The name of the department may undergo changes throughout the life of this document but it is assumed the department responsible for the EPBC Act will remain the regulator of the approval.

Trust for Nature (TfN) means the statutory body enacted under the *Victorian Conservation Trusts Act 1972* and is responsible to covenants enacted as a result of that Act. Regardless of any future name changes, this document assumes that a successor organisation would take responsibility for and be bound by the covenants should TfN be dissolved.

Landholder means the current or future owner of the Offset area or their legal representative or their delegate, where the delegate is the person responsible for land management within the Offset area (e.g. farm manager).

1. Introduction

1.1 Background information / description of the action

The Satterley Property Group (SPG) is undertaking the Lindum Vale Residential Development (LVRD), Mickleham Road, Mickleham, Victoria (Figure 1). The LVRD was declared a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and is being assessed via Preliminary Documentation (EPBC Act referral number 2015/7516). An ecological assessment of the development site and an environmental impact assessment of the LVRD is provided in the Preliminary Documentation by which EPBC Act referral 2015/7516 is assessed. The controlling provisions on the action are summarised as significant impacts on *Listed Threatened Species and Communities* protected under Section 18 and Section 18A of the EPBC Act.

The impacts on *Listed Threatened Species and Communities* were described in detail in the Preliminary Documentation and are summarised here. The Preliminary Documentation identified that there would be a significant impact on one Matters of National Environmental Significance (MNES):

- 97.05 hectares of Habitat for Golden Sun Moth *Synemon plana* (GSM).

The impact area considered to be GSM habitat is outlined in Figure 2.

The details of the development site are provided Table 1.

Table 1 Development Site Details

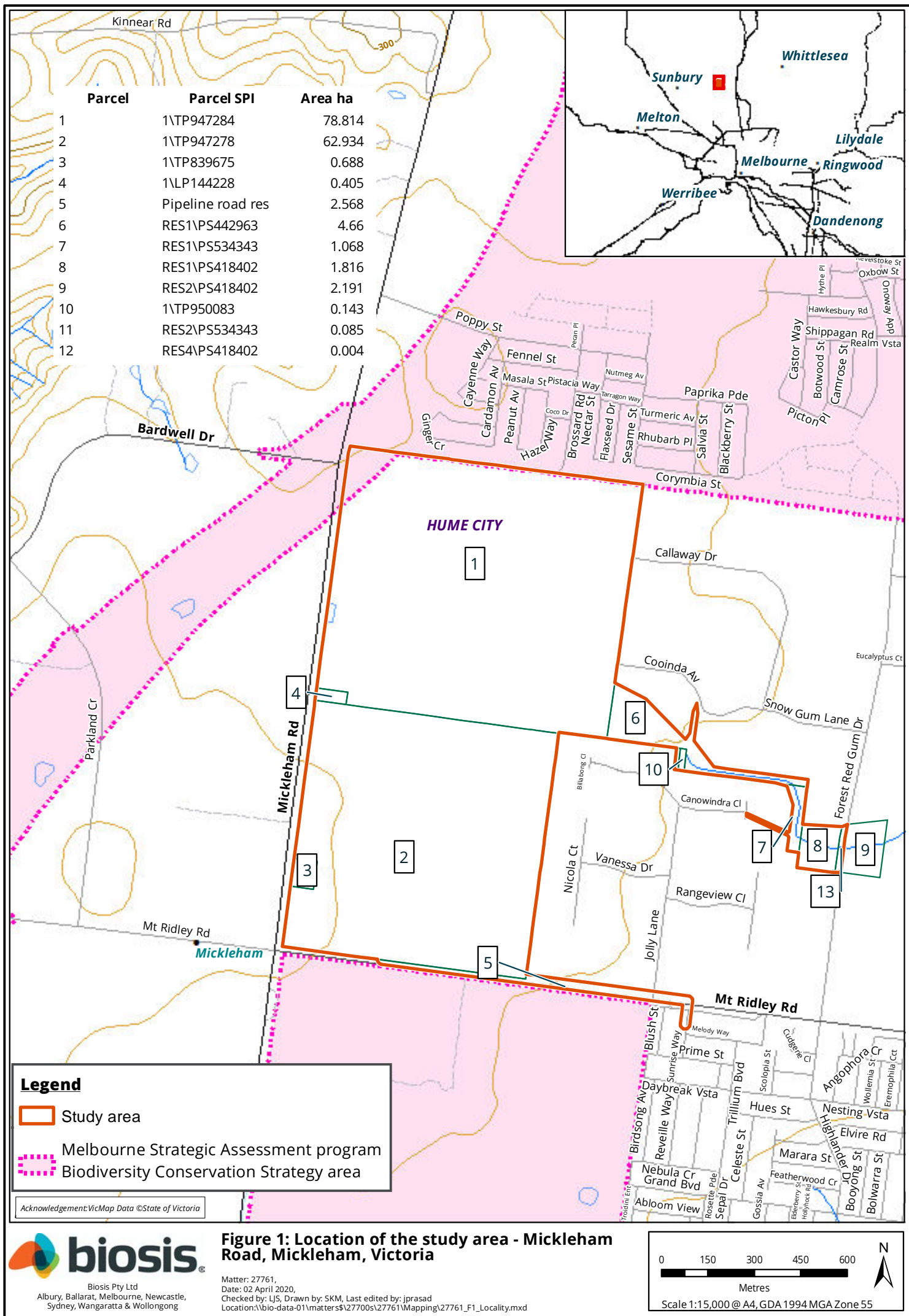
Site details:	
Applicant	Satterley Property Group
Location/address of Development Site	1920 – 1960 Mickleham Road Mickleham
Local Government Area	City of Hume
Catchment Management Authority	Port Phillip and Western Port
Responsible Authority	Department of Environment, Land, Water and Planning
EPBC Act referral	2015/7516

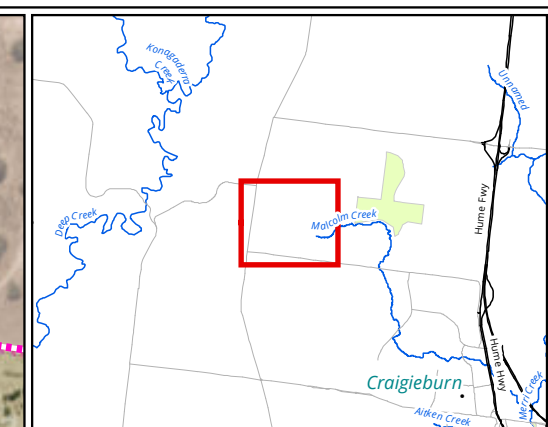
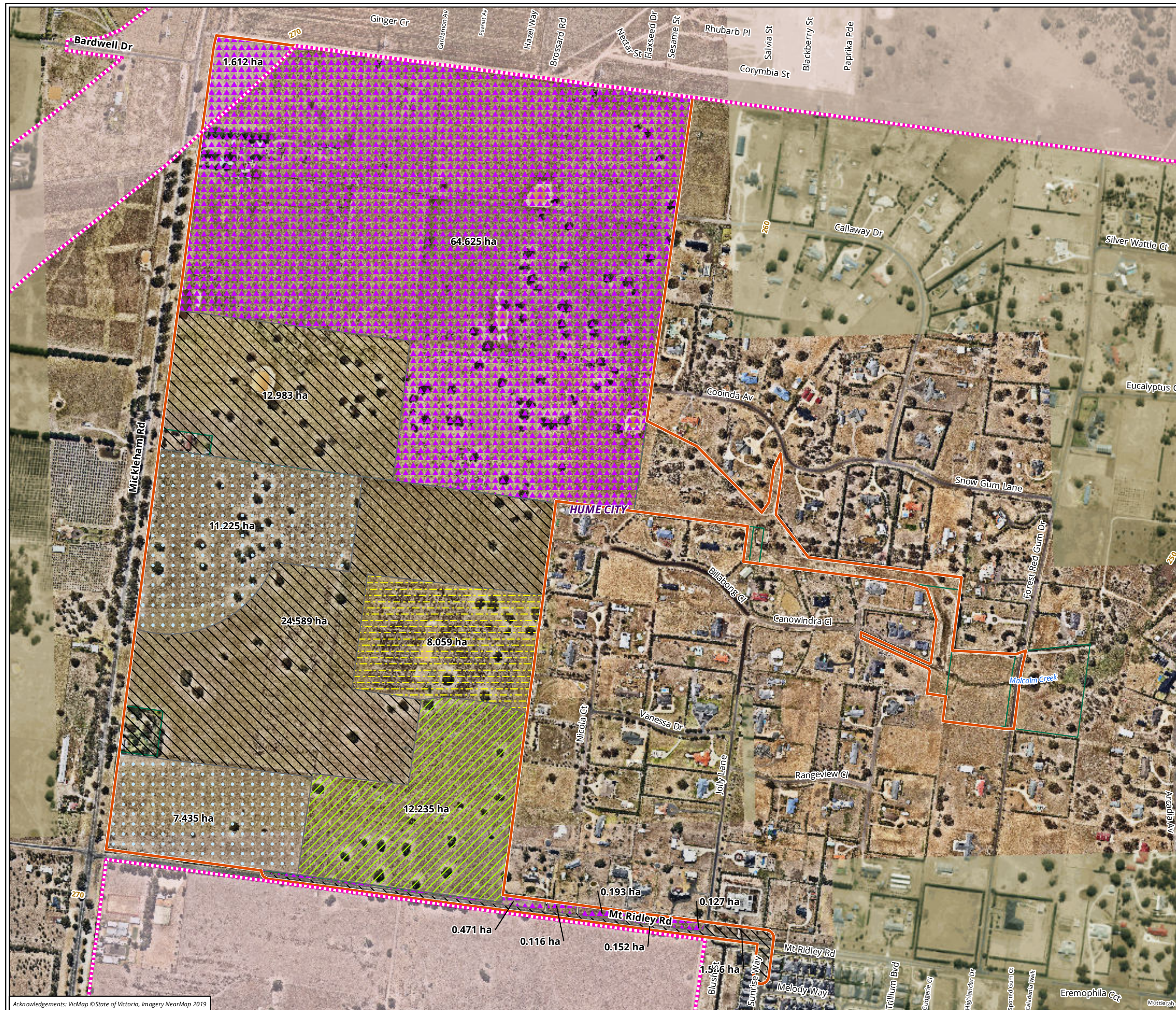
1.2 Purpose

The purpose of this OMP is to describe how the provision of Environmental Offsets under EPBC Act referral 2015/7516 will be met in part by an Offset area established at 235 Muncktons Lane, Glenaroua. The specific objectives of this OMP are as follows:

- Offset area protection (security): In-perpetuity, legal protection of the conservation values of the Offset area.
- Offset area protection (threat abatement): in-perpetuity management commitments for removing the threats posed by agricultural production and current land use rights.
- Offset area improvement: An intensive 10-year program of management actions to be implemented from the commencement of the OMP to improve GSM habitat Quality.
- Offset area maintenance: In-perpetuity management actions that will ensure that the improvement achieved in the first 10 years of the OMP is maintained over time.

The management actions are described in the sections that follow and are supported by schedules at the end of this document (Appendix 1).





Legend

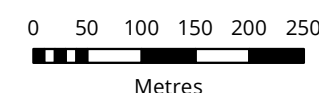
- Study area
- Parcel boundary
- Melbourne Strategic Assessment (MSA) program
- Biodiversity Conservation Strategy (BCS) area

Golden Sun Moth habitat

Suitability Score with area summary

- 0 - 39.158 ha
- 2 - 67.297 ha
- 4 - 8.059 ha
- 5 - 18.660 ha
- 8 - 12.235 ha

Figure 2 The extent of GSM habitat within Lindum Vale



Scale: 1:7,000 @ A3
Coordinate System: GDA 1994 MGA Zone 55



Matter: 27761,
Date: 02 April 2020,
Checked by: SGM, Drawn by: SKM, Last edited by: jprasad
Location: \\bio-data-

1.3 Objectives

This OMP has the following objectives:

- Provide supporting documentation for the establishment of a conservation covenant for the Offset area;
- Describe the Offset area including location, size, condition, environmental values present and surrounding land uses and provide maps of the Offset area.
- Document the presence and baseline Quality of the GSM habitat within the Offset area.
- Define specific objectives to demonstrate GSM habitat Quality improvement.
- Describe specific management actions, and timeframes for implementation, to be carried out to meet specific objectives.
- Define key performance indicators to demonstrate the improvement to the Quality of GSM habitat.
- Detail the nature, timing and frequency of monitoring to determine the success of management actions against key performance indicators.
- Provide information on indicative corrective actions that will be implemented in the event monitoring activities indicate key performance indicators are not or are unlikely to be achieved.
- Explain the roles and responsibilities for implementing the management actions.

All management actions are consistent with conservation advice for GSM, and threat abatement plans relevant to both protected matters. These documents are referenced throughout where necessary.

1.4 Roles and responsibilities

This section is important because it provides the details of which entities (see Definition of terms section above for the full list of entities listed in this document) are responsible for the various components of this OMP. An OMP must include the roles and responsibilities for implementing the management actions. However, this section expands on this requirement to include the execution of the conditions themselves. Note that the Credit Trading Agreement (CTA) and Trust for Nature (TfN) covenant have further contractual obligations defined as part of their terms and conditions and should be referred to as necessary.

Table 2 provides a list of the responsibilities allocated to each entity and further description is provided below. The legal liabilities associated with these responsibilities are not directly controlled by this document but are conferred through an approval under the EPBC Act for EPBC Act referral 2015/7516, the Credit Trading Agreement and the TfN covenant.

Satterley Property Group (SPG): An approval for EPBC Act referral 2015/7516 will be granted to the approval holder, who is the SPG. As the approval holder, SPG will be ultimately responsible for execution of the approval conditions for their project, the LVRD. Unless otherwise agreed in a legally binding document, SPG retains ultimate responsibility for ensuring the approval conditions are met to the satisfaction of DAWE including providing compensation for loss of GSM habitat via implementation of the OMP, ecological monitoring, reporting to DAWE, and ensuring adequate oversight (e.g. auditing). SPG will engaged the Landholder of 235 Muncktons Lane, Glenaroua to deliver Environmental Services on their behalf, including implementation of the management actions in this OMP.

Trust for Nature (TfN): The responsible authority for the conservation covenant under the *Victorian Conservation Trust Act 1972* (VCT Act) is Trust for Nature (TfN). TfN has authority under the VCT Act to enforce restrictions contained in the covenant but also provides advice on land management to the Landholder (both during the 10 year management period and from Year 11 onwards). TfN will bear no responsibility for the execution of approval conditions for EPBC Act referral 2015/7516.

Table 2 Offset area responsibilities

Notes to table: SPG: Satterley Property Group. Landholder: refers to the Landholder or their delegate (e.g. farm manager).

Responsibility	Responsible entity	Obligation arising from	Person who will undertake the work
Executing approval Conditions for EPBC 2015/7516 when provided (i.e. providing offsets)	SPG	Statutory approval conditions for LVRD	SPG or their representative Ecological consultant
Implementation of OMP (i.e. conservation and maintenance works in Offset area)	Landholder	TfN covenant on Offset area	Landholder or their contractor
Routine inspections of Offset area	Landholder	TfN covenant on Offset area	Landholder or their contractor
Keeping records of conservation and maintenance works, and results of routine inspections in Offset area	Landholder	TfN covenant on Offset area	Landholder or their contractor
Ecological monitoring of Offset area	SPG	Statutory approval conditions for LVRD	Experienced ecologist engaged by the SPG/ Landholder with the costs invoiced to SPG
Auditing of compliance with approval conditions for EPBC 2015/7516	SPG	Statutory approval conditions for LVRD	An independent and suitably qualified person as detailed in the EPBC Act Independent Audit and Audit Report Guidelines (2015).
Records and reports of works and routine inspections for TfN	Landholder	TfN covenant on Offset area	Landholder or their contractor
Ecological monitoring reports	Landholder	TfN covenant on Offset area	Experienced grassland ecologist to provide report to Landholder
Annual compliance reporting to DAWE	SPG	Statutory approval condition for LVRD	Landholder or their contractor to provide annual report to SPG as per management action. SPG to provide annual compliance report to DAWE (N.B. will include details of both the development site and Offset area).
Reporting non-compliance to DAWE	SPG	Statutory approval condition for LVRD	Landholder to inform TfN, SPG and DAWE in the event of an Incident. Incident means any event which has the potential to, or does, impact on protected matter(s) occurring in the Offset area. Minor seasonal issues like fluctuations in weed cover can be discussed with TfN in the course of routine works planning but does not meet the description of an Incident.
Review of OMP (in accordance with the adaptive management provisions of OMP)	Landholder	TfN covenant on Offset area	Landholder in consultation with TfN
Providing advice on and monitoring compliance with TfN covenant	TfN	TfN covenant on Offset area	Staff members of TfN

Landholder: The TfN covenant binds the current (and future) Landholder to the standard restrictions in the TfN covenant and to the requirements described in this OMP. As agreed with SPG and TfN, the Landholder will be responsible for carrying out the works and associated reporting to manage the Offset area. The Landholder will also facilitate access to the Offset area for ecological monitoring and auditing, as required. The Landholder can engage suitably qualified contractors to carry out the works on the Landholder's behalf. The Landholder can deputise responsibility for carrying out the works to a designated site manager and/or managing ecologist, however, the Landholder remains responsible for ensuring the works are undertaken (Table 2).

Funding arrangements: Financial liabilities have been agreed between SPG, TfN and the Landholder, who are parties to the TfN agreement. In general terms, TfN will retain sufficient funding to ensure that the Offset area can be managed according to the 10-year management period described in this OMP. A portion of the funds held in trust are released each year to the Landholder, with the exact arrangements stipulated in the TfN agreement. The CTA has further arrangements pertaining to financing the management and monitoring of the Offset area, however, the details of the financial arrangements associated with the Offset area are beyond the scope of this OMP.

1.5 Other offset requirements

The clearing of native vegetation associated with the LVRD was also assessed by the Department of Environment, Land, Water and Planning (DELWP) as part of planning scheme amendment C205 and will also require a planning permit issued by the City of Hume. Any permit issued by the City of Hume will require environmental offsets prescribed under the Victorian *Guidelines for the removal, destruction or lopping of native vegetation* (DELWP 2017). Where possible, the environmental offsets provided to fulfil any approval conditions for EPBC 2015/7516 will contribute to the offset requirements under the relevant planning permit. However, additional environmental offsets may be required to meet all the requirements of any planning permit and these would not be relevant to this **OMP** and are not mentioned further.

1.6 OMP commencement

The implementation of the OMP begins and the agreed funds released to the landholder when the conservation covenant has been executed and registered on-title. The funds due to the Landholder are for the purchase of the offsets and include management costs for the offset site (i.e. all initial and 10-year management costs) over the 10-year management period (Section 3.5). TfN will retain sufficient funds in trust to provide for the 10-year management of the Offset area as well as a contingency for unexpected events or costs.

The registration of the covenant will be completed as soon as possible thereafter noting that administrative requirements may mean that the registration of the covenant with the titles office (currently called Land Use Victoria) takes a further 12 months to be completed and signed-off by the Commonwealth Minister for the Environment. This registration process is an administrative process only and will not prevent the commencement of the management actions of the OMP once the CTA is executed since the funds are non-refundable.

1.7 Financial disclaimer

Please note that any information provided in this OMP regarding financial arrangements is for information purposes only. This OMP is not designed to govern any financial arrangements regarding purchase, management or monitoring of the Offset area. The financial arrangements are governed by TfN agreement and the CTA.

2. Offset area description

This section provides a description of the Offset area including location, size, condition, environmental values present and surrounding land uses. This section also describes the current ecological condition of the GSM habitat using baseline data and other supporting evidence that documents the presence and baseline Quality of the GSM habitat.

2.1 Environmental offsets requirements

The Offsets Assessment Guides for the approved impacts were confirmed as meeting the EPBC Act Environmental Offsets Policy. The resulting offset requirements amounted to the provision of 300.5 hectares of GSM habitat.

As no single site is large enough to provide the entire 300.5 hectare offset requirement, SPG will secure third party offsets at four locations to provide this total area. This OMP covers 40.3% of total requirements (121.0 hectares) for confirmed GSM habitat. The remainder of the offsets that cannot be provided under this OMP will be provided by three other locations, each of which will be the subject of a separate OMP.

2.2 Description of the Offset area

2.2.1 Location and surrounding land uses

The Offset area is located at 235 Muncktons Lane, Glenaroua 3764, Victoria (Figure 2). The offset area is approximately 50 kilometres north of development site, and 20 km north of the regional centre of Kilmore (Figure 3). The site is part of a larger farming enterprise of approximately 300 hectares. It is located within the Victorian Goldfields Bioregion and supports a range of uses including sheep grazing on native pasture. The property includes other Victorian biodiversity offset sites but none that overlap with the proposed GSM offset. The landholder plans to increase the protections in place with further offset agreements if compatible with farm operations while also reserving some areas of the property to maintain farm operations including sheep grazing. The details of the land titles on which the Offset area is located are provided in Table 3.

The Offset area is located across the largely treeless southern portions of the property (Figure 4). The property is otherwise surrounded by agricultural land, much of which is also largely utilised for sheep grazing or cropping.

The Offset Area will, in combination with other existing offsets, be approximately square shape to minimise the edge-to-interior ratio of the Offset area. Because the Offset area provides a large, relatively continuous area of GSM habitat, the landscape values of the Offset area also add to its conservation value.

2.2.2 Size

The Offset area provides a total of 121.0 hectares of GSM habitat (Figure 4).

2.2.3 General description of environmental values present

The Offset area has no known history of cultivation, significant pasture improvement or intensive fertilizer application. The offset area is grazed with sheep, which manages biomass to a level suitable for GSM breeding. The site is subject to sheet and tunnel erosion and significantly impacted drainage lines have had visible areas of active erosion buffered by five metres and excluded from the offset area.

The landowner is actively working with DELWP extension staff and has an active plan for a range of interventions to control erosion. This includes fencing (approximately 40% of active erosion areas fenced to date) and the installation of gabions, rock chutes, timber and steel structures and associated revegetation works. These works will continue until at least the end of 2020 when all DELWP recommended works are scheduled for completion. The landowner has noted that the works conducted to date have had positive results.

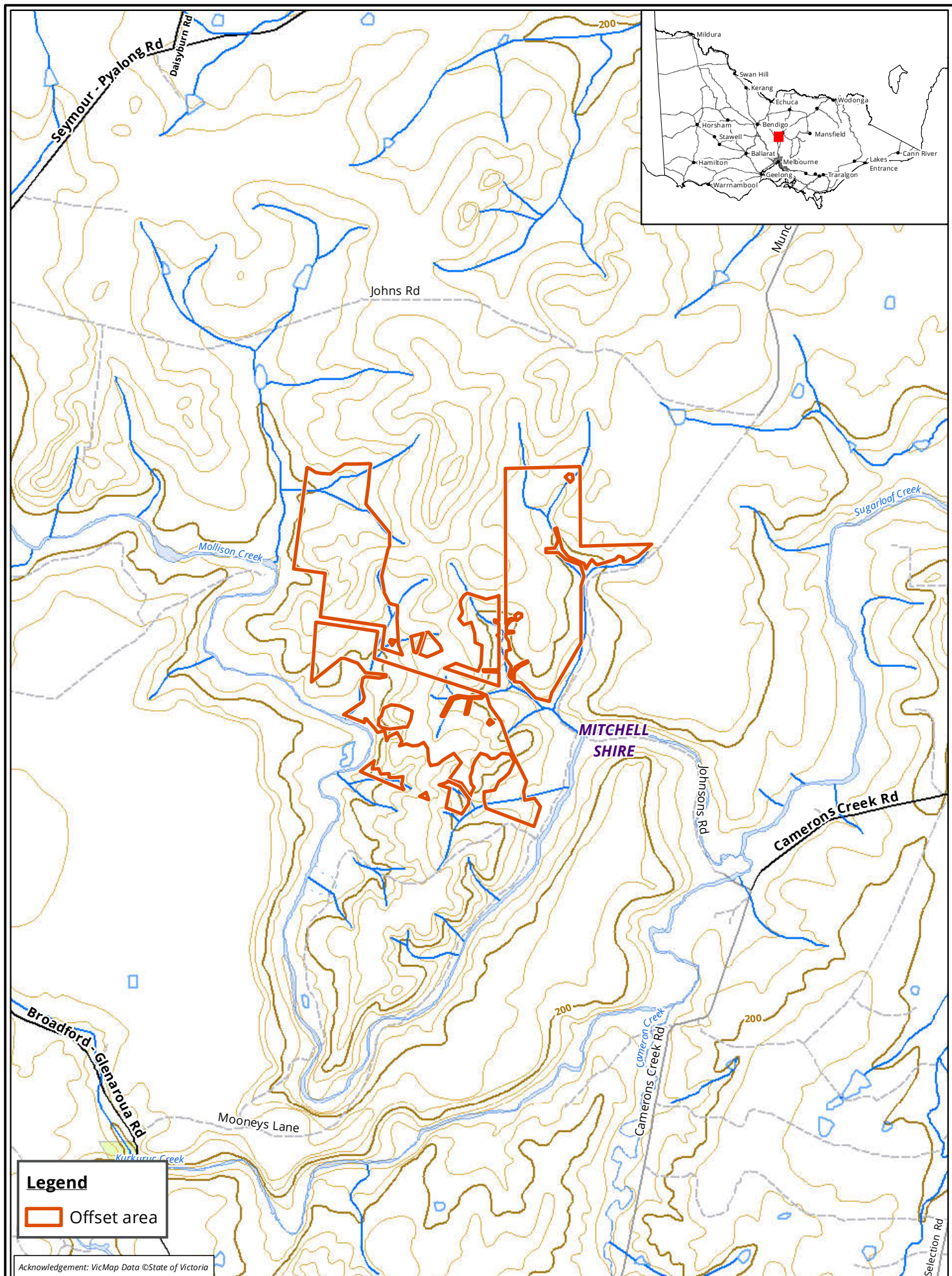


Figure 3 Location of the Muncktons Lane Offset area, Glenaroua, Victoria

Matter: 29865/31287,
 Date: 03 April 2020,
 Checked by: SGM, Drawn by: SKM, Last edited by: smitchell
 Location: F:\29800s\29865\Mapping\29865_F3_Glenaroua.mxd

0 250 500 750 1,000

Metres

Scale 1:25,000 @ A4, GDA 1994 MGA Zone 55



00

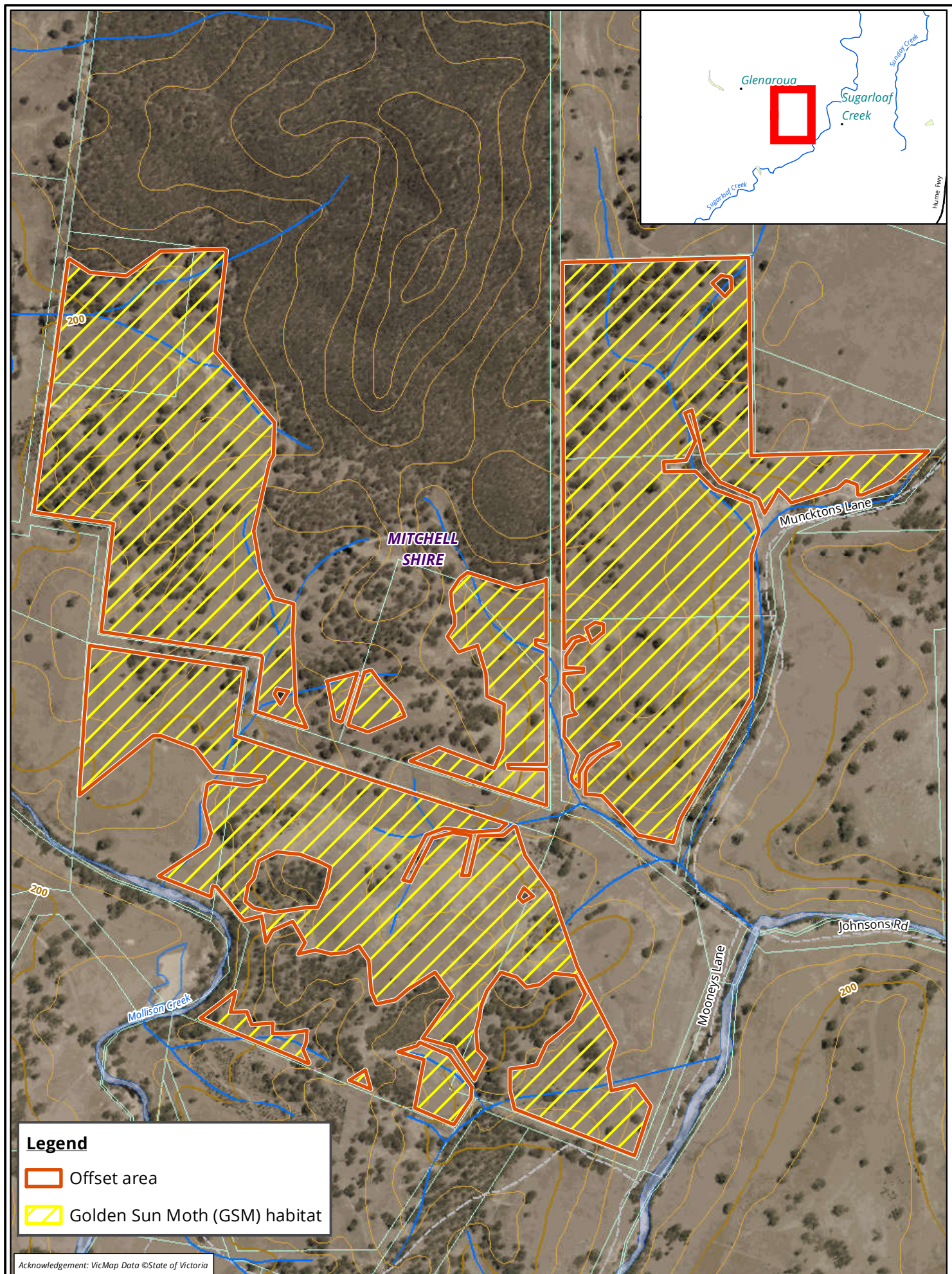


Table 3 Offset area and property details

Site details:	
Type of offset	Third party
Landholder of Offset area	Implexa Property Pty Ltd (ABN 91614987021)
Landholder Contact	Paul Dettmann
Location and address of Offset area	235 Muncktons Lane, Glenaroua 3764
Area of Offset area (ha)	121.0 ha
Allotment	3A, 3B, 6, 14, C18, C4, C5, 16C, 68H
Parcel identifier (SPI)	C4, C5, C18, 68H~C\PP2665, 6, 14, 16C~E\PP2665, 3A & 3B~F\PP2665
Local Government Area	Mitchell Shire
Security mechanism	Trust for Nature covenant registered on title
Bioregion	Goldfields

The Offset area excludes areas covered by existing offset agreements (TfN C2047 and BB 3014) (Figure 4). The offset area supports small patches of eucalypts and scattered individual trees but overall has a canopy cover of less than 5%. Lower lying areas in the east are dominated by River Red-gum *Eucalyptus camaldulensis*, and Yellow Box *Eucalyptus melliodora*. Elsewhere the most common tree is Grey Box *Eucalyptus macrocarpa* with other trees including Bundy *Eucalyptus goniacaylx*, Red Stringybark *Eucalyptus macrorhyncha* and Red Box *Eucalyptus polyanthemus*.

There are no formal easements within the net Offset area and existing undeveloped road reserves have been excluded. No future utilities or road easements can be applied to the Offset area as these are likely to conflict with the objectives of this OMP.

The offset area supports less than a 1% cover of scattered eucalypt regeneration and medium shrubs including a variety of wattles *Acacia* spp.. Scattered small shrubs include species such as Grey Guinea-flower *Hibbertia obtusifolia* and Thin-leaf Wattle *Acacia aculeatissima*.

The ground cover is dominated by native grasses that are food plants for GSM such as Wallaby-grasses *Rytidosperma* spp., Tussock-grasses *Poa* spp., Common Wheat-grass *Anthosachne scabra*, Weeping-grass *Microlaena stipoides*, Five-awned Spear-grass *Pentapogon quadrifidus* and Spear-grasses *Austrostipa* species. This grassy ground cover is locally species rich with common herbaceous species including Grassland Wood-sorrel *Oxalis perennans*, Slender Dock *Rumex brownii*, Bluebells *Wahlenbergia* spp., Smooth Solenogyne *Solenogyne dominii*, Common Onion-orchid *Microtis unifolia*, Sun-orchids *Thelymitra* spp., Wattle Mat-rush *Lomandra filiformis*, Small St John's Wort *Hypericum gramineum*, Common Raspwort *Gonocarpus tetragynus*, and Sheep's Burr *Acaena* species.

The offset area has an average cover of weeds estimated at between 20% and 30%, although small scattered areas support a cover of weeds approaching 50%. The weediest areas are restricted to narrow bands along the ephemeral drainage lines.

Woody weeds are typically rare within this property although a small infestation of Horehound *Marrubium vulgare*, Gorse *Ulex europaeus* and Sweet Briar *Rosa rubiginosa* were observed across the offset area.

Perennial grassy weeds such as Toowoomba Canary-grass *Phalaris aquatica* are relatively rare, although Brown-top Bent *Agrostis capillaris* is ubiquitous and generally has a cover of between 5% and 10%. Other perennial weeds are relatively uncommon and include Yorkshire Fog *Holcus lanatus* and Sweet Vernal-grass *Anthoxanthum odoratum*.

Common geophyte weeds include Onion Grass *Romulea rosea* which is ubiquitous but has a low cover. The introduced South African Orchid *Disa bracteata* is present and locally common. This species has the potential to become problematic.

The most common weeds on the offset area are annual grasses such as Hair-grasses *Aira* species, Fescue *Vulpia* species, Quaking-grasses *Briza* species, Wild Oats *Avena* spp. and Bromes *Bromus* spp.. While common and locally providing a visually obvious cover of up to about 10%, these annuals are not high threat weeds in this environment.

Targeted surveys for GSM were undertaken by Biosis during the 2019/20 summer survey season. The GSM surveys were undertaken using the field methods stipulated in the Commonwealth EPBC Act Policy Statement 3.12 (DEWHA 2009) for the entire Offset area.

A total of 968 male GSM were recorded flying within the area surveyed from three surveys. Female moths, which are more difficult to detect, were not observed during the surveys. The GSM individuals were distributed throughout the area surveyed (Figure 5).

The Offset area is known to support at least one Victorian listed threatened flora species (Biosis 2020):

- Plump Swamp Wallaby-grass *Amphibromus pithogastrus* (Listed under Victorian *Flora and Fauna Guarantee Act 1988*).

A detailed description of the conservation values within the proposed Offset area is included in Biosis (2020). A total of 80 native and 49 introduced plant species were recorded from two inspections of the Offset area in 2018 and 2019 (Biosis 2020). More native and weed species will be present but seasonal conditions and survey intensity typically preclude the detection of all species at any one time. The Offset area supports many grasses that are known GSM food plants including Spear-grasses *Austrostipa* spp. and Wallaby-grasses *Rytidosperma* spp. (Biosis 2020).

2.3 Current condition

The vegetation condition of the Offset area was estimated using the Habitat Hectares method (Parkes *et al.* 2003). The suitability and quality of GSM habitat was assessed against the descriptions provided in (DEWHA 2009). The condition assessments were used in conjunction with consultation with DAWE to calculate the Quality score used to calculate the required offsets.

2.3.1 Vegetation current condition

The vegetation within the Offset area was assessed using the Habitat Hectares method, as assessed against the Grassy Woodland (EVC 175) benchmark (Table 4). Appendix 4 provides the explanation of the GSM Quality scoring method.

2.3.2 GSM habitat current condition

GSM habitat was assessed against the habitat characteristics provided in DEWHA (2009) (Table 5).

Table 6 provides the Quality scoring for the Glenaroua GSM offset. Appendix 4 provides the explanation of the GSM habitat Quality scoring method. The Quality score utilises the Site condition components of the Habitat hectares method only since site context is already accounted for in the first parameter.

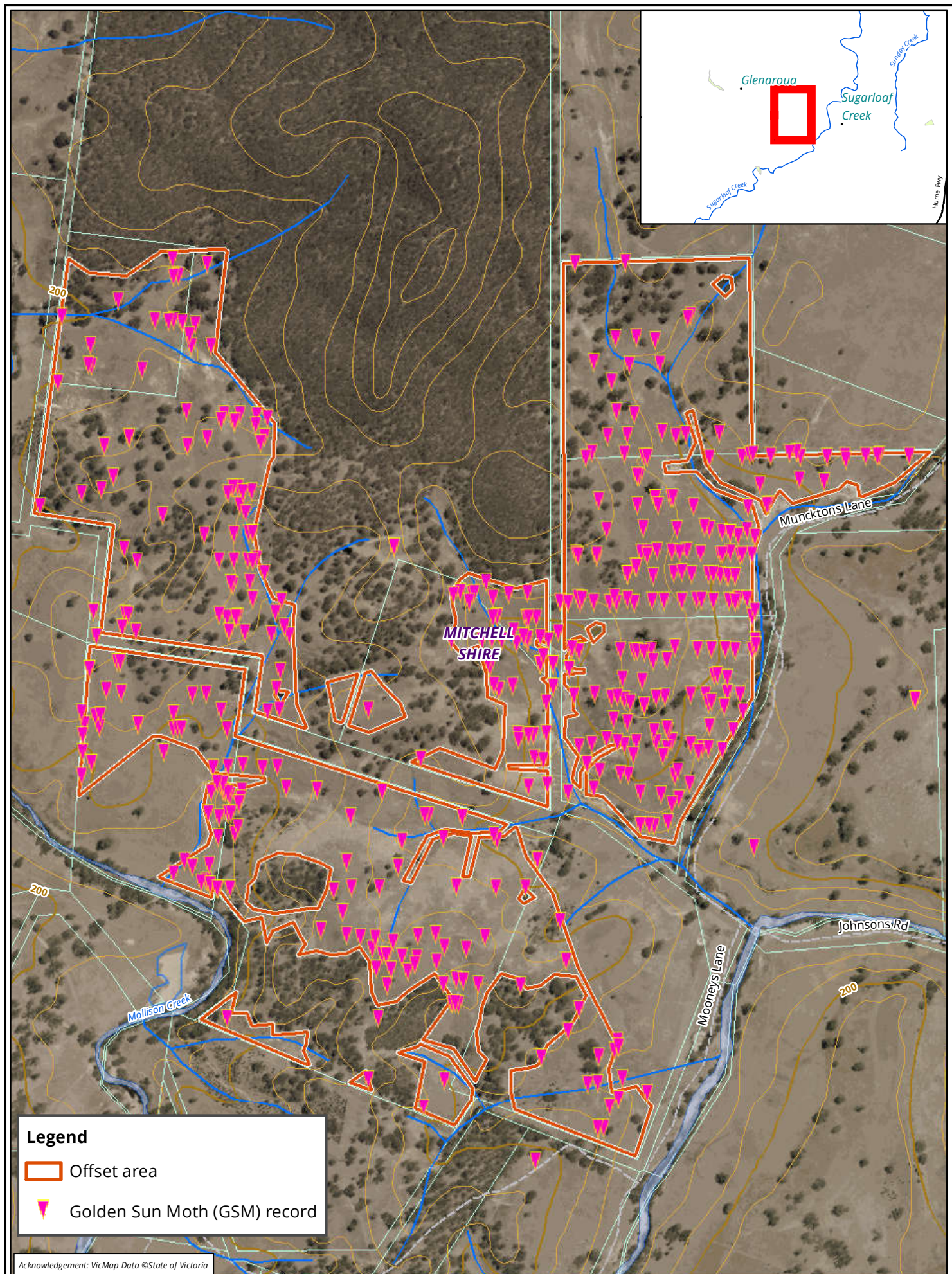


Table 4 Habitat Hectares results, Glenaroua

Site ID			1
Habitat Zone ID			A
EVC Name - #			Grassy Woodland (EVC 175)
Max Score			Score
Site Condition	Large Trees	10	3 (scattered large trees are present)
	Tree Canopy Cover	5	0
	Lack of Weeds	15	6
	Understorey	25	15
	Recruitment	10	3
	Organic Matter	5	3
	Logs	5	0
	Site Score (standardised x1.36)		30
Landscape Value	Patch Size	10	8
	Neighbourhood	10	4
	Distance to Core	5	4
	Landscape Score		16
HABITAT SCORE		100	46
Habitat points = #/100		1	0.46
Habitat Zone area (ha)			121.0
Habitat hectares (Hha)			55.7

Table 5 GSM habitat condition results, Glenaroua Property

Habitat characteristic	Assessment
Size of patch	Patch size is large (greater than 10 hectares)
Cover of food plants	Cover of food plants appeared scattered throughout at time of 2019 assessment, although exact amount of cover difficult to measure
Distance to nearest source population	Contiguous with confirmed population/existing GSM offset area
Amount of shading	Minor
Aspect	Flat with gentle undulations (creekline excluded from Offset area)
Amount of bare ground	Cover of bare ground less than ideal (less than 20%)
Presence of rocky areas	Rocks still present although historical removal of surface rock may have occurred
Soil characteristics	Sedimentary derived duplex soils vulnerable to erosion
Land use history	Long history of sheep grazing, current grazing pressure low to moderate

Table 6 Glenaroua GSM habitat Quality score

Parameter	Score	Justification
Site context	2/3	The Offset area is larger than 10 hectares. The offset area is incorporated with other protected areas, which provides an appropriate configuration for reducing edge effects. The offset has gentle to moderately steep slopes with a variety of aspects and some shading.
Site condition	1/3	The Offset area supports moderate quality native vegetation over most of the site.. As a mostly treeless version of a woodland community the VQA site condition score for the offset area is calculated as 30/75 (Table 4). Both annual and perennial weeds were present throughout noting however that the offset area and the property as a whole does not have Chilean Needle Grass <i>Nassella neessiana</i> such that none of the weeds present are known food plants for GSM. Therefore the offset area cannot qualify for a score of 3/3 and just fails the criteria for 2/3.
Species stocking rate	2/4	A total of 968 GSM were recorded from three surveys (704, 145, 119 & 0) over the 121.0 ha offset area. As the fourth survey did not record GSM it was excluded as being out of the flight season for this area. This gives a stocking rate of about 9 moths per hectare. This places the survey area within the 5-20 moths per hectare category.
Quality score	5/10	A score out 5 (out of 10) indicates that the offset area is of already favourable to the species. There are opportunities to improve Quality by decreasing weed cover and allowing Wallaby Grass cover to increase and greater plant growth overall.

2.4 Suitability of Offset area to provide a conservation gain

Under Section 7.6 of the EPBC Act Environmental Offsets Policy (DSEWPaC 2012), *environmental offsets must deliver a conservation gain for the impacted protected matter, and that conservation gain must be new, or additional to what is already required by a duty of care or to any environmental planning laws at any level of government*. The following sections confirm that the proposed Offset area meets this requirement having no existing environmental offsets, on-title protections or other proposed conservation protections. In addition, the Offset area has current permitted land uses under the Mitchell Planning Scheme that are also recognised threats to GSM habitat as described below. Under these conditions, it was assessed that the risk of loss of GSM habitat from the Offset area was 10%.

2.4.1 Current permitted land uses

The property is zoned Farming Zone (FZ) within the Mitchell Shire Planning Scheme, which controls the use of the land. The purpose of the FZ is to provide for the use of land for agriculture. Uses for which a permit is *not* required include:

- Agriculture
- Cattle feedlot
- Domestic animal husbandry
- Dwelling
- Grazing animal production
- Poultry farm
- Timber production at least 40 hectares in size.

Under the Farming Zone, there are no permit requirements for the following agricultural activities that can lead to the decline or loss of native plant species and/or encourage the proliferation of weeds, which are known threats to GSM habitat:

- Fertiliser application.
- Over-sowing with introduced pasture grasses or clover.

- Over-grazing or grazing with larger livestock that cause more damage to grasslands (especially horses).
- Biomass accumulation and loss of inter-tussock spaces.
- Selling the land to a new owner who may undertake the above activities.

2.4.2 Exemptions for minor native vegetation removal

Clause 52.17 of the Mitchell Planning Scheme controls the removal of native vegetation via a planning permit and avoid, minimise and offset process. In addition to threats from existing uses above, clause 52.17-7 provides a table of exemptions where no planning permit is required to remove native vegetation for certain specified activities. These activities include the following that could lead to incremental loss of condition or extent of GSM habitat:

- Operation or maintenance of an existing fence.
- Removal of dead vegetation.
- Fire protection, including periodic fuel reduction burning or construction of firebreaks and firefighting access tracks.
- Grazing by domestic stock.
- Pruning of up to 1/3 of the foliage of individual plants.
- Treatment of pest animal burrows or weed infestations.
- Geothermal energy/Mineral/Stone exploration or extraction.
- Minor Utility installation.

These activities can be undertaken without a permit to remove native vegetation and therefore there is no requirement to provide environmental offsets under state legislation.

2.4.3 Existing offset arrangements

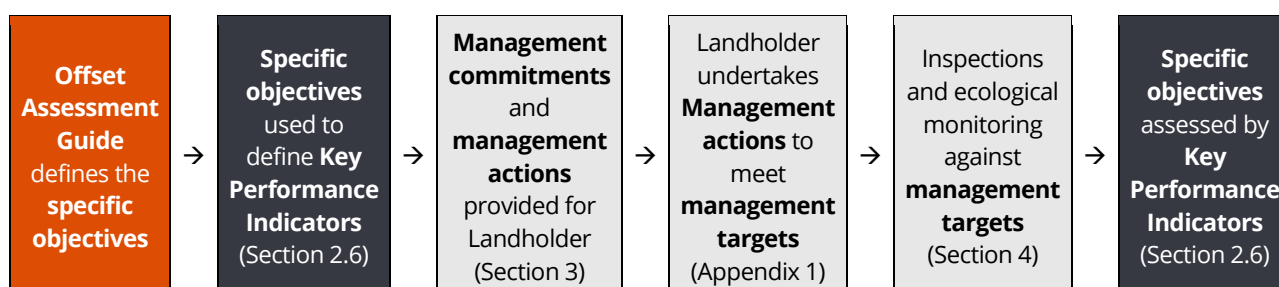
A title search has been completed and the Offset area is not affected by any conservation related encumbrances. The Offset area therefore has not been allocated for the provision of any other offsets, either under the EPBC Act Environmental Offsets Policy or for provision of offsets under any current or past Victorian policy.

2.5 Specific objectives

This section presents the specific objectives to demonstrate GSM habitat Quality improvement over the period of the OMP's implementation. The specific objectives arise from the Offsets Assessment Guide and are used to determine the overall improvements required to be achieved at the end of 10 years. The specific objectives are broader scale objectives than the management commitments and management actions that are specified in Section 3.

Figure 6 below shows how the specific objectives relate to the management commitments, management actions, and management targets.

Figure 6 Specific objectives and their relationship to the management commitments



2.6 Specific objectives and key performance indicators

Table 7 below describes the specific objectives for the Offset area that result from the inputs into and the outputs from the Offsets Assessment Guide (a.k.a offsets calculator). Achieving the specific objectives will therefore ensure that an environmental offset that meets the requirements of the conditions of approval and the EPBC Act Environmental Offsets Policy will be provided. The Offset area as a whole will be assessed against key performance indicators that will determine if the specific objectives have been met (Table 7). The key performance indicators use technical terminology and so are broken down into management targets in for the Landholder to implement on the ground in Section 3.

2.7 Measuring improvement in Quality

The following sections explain how improvements in Quality are to be measured given the limitations of the Habitat hectares and Quality scoring systems.

2.7.1 Vegetation condition

Quality improvement will be measured using the Habitat Hectares method at each of the permanent monitoring plots and as an average Quality for the whole area. The GSM Quality scoring method was used to obtain the Quality score of the Offset area in the Offsets Assessment Guide and should be replicated to determine the final Quality score.

Since the Habitat Hectares method uses categories (which are converted to numeric scores) there is a limited number of ways in which the increase in Quality can be attained within the Habitat Hectares scoring system:

- The Landscape score is not influenced by on-site management actions and so is not expected to change of the 10-year management period (Table 8).
- Large Trees is scored out of 10 but is a function of time (decades to centuries) and so cannot be influenced by the management actions. However, changes to the grazing regime should provide benefit to the remaining large old trees by reducing grazing pressure and ensuring their protection from agricultural development. Management actions should therefore maintain this score at 3 (out of 10).
- Canopy cover is scored out of 10 against a benchmark of 15% cover. Since GSM require open grassland, the aim of management will be to continue grazing in a manner which prevents shrub and eucalypt encroachment and shading out of GSM habitat. The target is therefore to maintain a canopy cover of the current 5% with natural recruitment potentially increasing this to 2 or 3% over the 10 years.
- Recruitment is scored out of 10 and is based on the adequate recruitment of woody species. While the offset area supports an adequate number of woody species when compared to the EVC benchmark, on-going sheep grazing means that only the larger wattle species such as Golden Wattle *Acacia pycnantha* and smaller unpalatable shrubs such as Grey Guinea-flower *Hibbertia obtusifolia*, show adequate recruitment (reflected in the score of 3 out of 10). Changes to the grazing regime or re-introduction of fire may encourage eucalypts and some of the more grazing sensitive species to recruit, which has potential to increase the score to one of the higher possible values, 6 or 10 (out of 10). However, recruitment of woody species is not an aspect of site condition that is relevant to GSM and so will not be the focus of management activities. Management actions should therefore maintain this score at 3 (out of 10). Note that if a mass germination event occurs, monitoring should track the progress of any mass seedling establishment to ensure large areas of native tussock grass cover isn't shaded out in the long term.

- Organic matter is scored out of 5 and is weighted by whether organic matter is non-native or of native plant origin. Organic matter scoring is therefore a result of biomass build up and weed cover. The current score of 3 (out of 5) can only be improved to a score of (5 out of 5) under the habitat hectares method. It is expected that this can be achieved using management actions for biomass control and weed control.
- Lack of Weeds is scored out of 15 with possible improvements for the offset area being 9, 11 or 13 (out of 15). The maximum scores (11, 13 or 15 out of 15) requires there to be <5% weed cover, which is not a practical target for this area due to the high starting weed cover and because the highly modified landscape provides a constant source of wind-borne and animal-borne weed seeds. The minimum improvement target is therefore set at 9 (out of 15). This minimum target requires average cover of weeds to be reduced from the current of 25% - 50% cover with the target to be <25%, with less than 50% of the weed cover provided by high threat weeds. The sub-groups of weeds will have lower targets within the overall target e.g. all woody weeds to be <1%.
- The Understorey is scored out of 25 and is a function of species diversity but also growth stage. The Understorey score is being suppressed by sheep grazing, and this is expected to improve once sheep grazing pressure is reduced and herbs can mature to their full height providing a greater variety of lifeforms. The target improvement is from 15 to 20 (out of 25).
- The Logs score (out of 5) is a function of tree cover but is also reduced by activities that remove woody debris such as tidying up of paddocks or wildfire. The cover of logs is not a habitat requirement for GSM so will not be the target of management actions. However, since coarse woody debris provides habitat for a range of native fauna species and is not known to be detrimental to GSM populations, general conservation principals should be applied to management of the Offset area so that logs are retained within the Offset area. No management target has been set because log production is unpredictable and will only occur in the limited areas where large trees are already present.

The Habitat Hectares scores that can be expected to be achieved at the end of the 10-Year management period are shown in Table 8 below.

Table 7 Offset area management specific objectives and Key performance indicators

Offset Assessment Guide	Specific objective	Key performance indicators (measurable through ecological monitoring)
Start area: 121.0 ha GSM habitat	Offset area protection (security): Provide permanent protection for the conservation values of the Offset area with a conservation covenant.	<ul style="list-style-type: none"> TfN agreement registered on relevant land titles
Risk of loss : 90%* confidence that the risk of loss decreases from 10%* to 1%* risk of loss	Offset area protection (threat abatement): permanently exclude agricultural production except as directed by this OMP.	<ul style="list-style-type: none"> No loss of GSM habitat or preventable weed introductions over 20 year time horizon No unauthorised access or unapproved works within offset area
Time over which loss is averted: 20 years**	Risk management: minimise the risk of the offset area failing to meet specific objectives. Procedures in place to manage and mitigate against incidents or emergencies.	
Gain:	Offset area improvement: Landholder commits to implementing the intensive 10-year program of management actions, routine inspections and facilitating annual ecological monitoring in accordance with the OMP.	<ul style="list-style-type: none"> Management actions adapted to seasonal conditions and/or new or emerging threats based on routine inspections and monitoring results. Large tree score (out of 10): <ul style="list-style-type: none"> <i>maintained at 3</i> Tree canopy cover score (out of 5): <ul style="list-style-type: none"> <i>maintained at 0</i> Lack of Weeds score (out of 15): <ul style="list-style-type: none"> <i>increases from 6 to 9</i> Understorey score (out of 25): <ul style="list-style-type: none"> <i>increases from 15 to 20</i> Recruitment score (out of 10): <ul style="list-style-type: none"> <i>maintained at 3</i> Organic litter score (out of 5): <ul style="list-style-type: none"> <i>increases from 3 to 5</i>
GSM: 85%* confidence GSM habitat Quality can be improved from 5* to 6* (out of 10)	Risk management: minimise the risk of the offset area failing to meet specific objectives. Procedures in place to manage and mitigate against incidents or emergencies.	<ul style="list-style-type: none"> No active rabbit warrens or fox dens, minimal evidence of pest animal impacts Tussock cover always sufficient to provide GSM habitat New weeds eliminated, emerging weed problems controlled to <1% cover, new pest animals eliminated Ecological monitoring undertaken in accordance with OMP Reporting undertaken in accordance with OMP Emergency management undertaken in accordance with OMP
Time to ecological benefit: 10* years		
Time over which loss is averted*: 20 years**	Offset area maintenance: Landholder commits to implementing the management commitments to maintain the improvement achieved in the first 10 years.	<ul style="list-style-type: none"> Habitat hectares score achieved at the end of Year 10 is maintained over next 10 years (to achieve 20 year time horizon) OMP adapted to changing circumstances or ineffective management actions

*input used in approved Offset Assessment Guide **Maximum value permitted to be used in Offset Assessment Guide

^No directly relevant input or output. 20 year time horizon assumed to be the most logical time period for maintenance to be applied

Table 8 Vegetation condition target improvement Habitat hectares scores (bold scores show improvement, italicised scores are maintenance)

Site			Glenaroua	Glenaroua
Time			Baseline	Post ten years management
EVC Name - #			Grassy Woodland (EVC 175)	Grassy Woodland (EVC 175)
Max Score			Score	Score
Site Condition	Large Old Trees	10	3	3
	Canopy Cover	5	0	0 (canopy cover will increase but not to the extent where it significantly shades GSM habitat)
	Lack of Weeds	15	6	9
	Understorey	25	15	20
	Recruitment	10	3	3+
	Organic Matter	5	3	5
	Logs	5	0	No target set
	Site Score		30	40
Landscape Value	Patch Size	10	8	8
	Neighbourhood	10	4	4
	Distance to Core	5	4	4
	Landscape Score		16	16
HABITAT SCORE		100	46	56
Habitat points = #/100		1	0.46	0.56
GSM Site quality score		3	1	2

2.7.2 GSM habitat

Quality improvement will be measured using the results for site score described above and the results of targeted surveys for GSM.

The scoring methods used to obtain the Quality score of the Offset area in the Offsets Assessment Guide is shown in Appendix 4 and should be replicated to determine the final Quality score. There is a limited number of options for recording an improvement in GSM habitat Quality under the 10 point system:

- Site context is not influenced by on-site management actions and so is not expected to change of the 10-year management period (Table 8).
- The expected improvement in GSM habitat quality (i.e. from 5 to 6 out of 10) will be provided by an increase in vegetation condition (as measured by the habitat hectare protocol) by 1 point (see above).
- The management actions have the potential to produce increased cover of GSM food plants and improve the tussock structure, with suitable inter-tussock spaces. Note however, that GSM populations fluctuate naturally in response to seasonal conditions outside the Landholder's control and since GSM are already in high numbers, it is unknown if an already large population will respond to the proposed management actions with further population increases.

2.8 Limitations and uncertainty

It is impossible to eliminate all uncertainty from natural systems. However, this OMP has been formulated using the best available information at the time. The information used includes the results of site inspections in 2018 and 2019, consultation with the Landholder, and the experience of the authors in grassland /grassy woodland management and research. Relevant federal and state government policies, procedures and databases have also been consulted where appropriate. The OMP has been subject to external review and quality assurance by TfN and the Landholder as part of the process to register the TfN covenant.

More than one option is available for the required one point quality score increase (i.e. an increase in population size, or an increase in habitat quality based on three site condition components) (Table 9), and management is expected to provide at least one of these outcomes.

Table 9 Glenaroua GSM habitat Quality score improvement target

Parameter	Score	Justification
Site context	2/3	(N/A management actions are not expected to influence the site context)
Site condition	2/3	It is expected that the cover of weeds will decrease and the ground-layer flora will be able to mature and reach a more natural growth form. The current site condition score of 30 is just below the threshold for obtaining a score of 2/3. Options to increase the habitat site condition score are available from improvements to the Lack of weeds, Understorey, Recruitment and Organic litter scores.
Species stocking rate	2-3/4	It is expected that the GSM population will remain stable and may increase over the 10 year management period. The current stocking rate is within the 5 – 20 moths per hectare category. Over 2400 moths need to be recorded from four surveys for the stocking rate score to increase. There is no way to know if such a large increase is possible in 10 years so Quality score will principally be increased by improving site condition.
Quality score	6/10	It is expected that the Quality will increase from 5/10 to 6/10 over the 10 years.

Management action results

The Offset area already supports a large GSM population, which provides certainty that conservation values are already present within the Offset area on which management actions can improve. The OMP includes a reasonable expectation that weed control combined with strategic grazing will reduce weed cover and impede weed seed production, which in turn, will provide increased recruitment, growth and seed production opportunities for the native grasses and herbs still in place, as well as the recruitment of woody species which will assist in habitat stabilisation and an increased site condition score. There is therefore a reasonable expectation that the management actions will result in an increase in the abundance and cover of native flora species. Since the dominant native grasses present are also GSM food plants, this management strategy along with management of biomass accumulation is expected to improve GSM habitat condition.

Recruitment and growth of native species occurs in response to seasonal conditions so there is a possibility that the recruitment and growth of native species will be slower than expected or may be inhibited altogether in the case of prolonged drought conditions. Such a situation would influence the condition score of the GSM habitat but would be outside the control of the Landholder. Contingencies for these events are dealt with under the adaptive management section of this OMP.

The results of the management actions themselves are also influenced by external factors that cannot be controlled including: annual variation in weather conditions, human-induced climate change, and fluctuations in pest animals and weeds. Contingencies for these events are dealt with under the adaptive management section of this OMP. Especially with unprecedented events expected under human-induced climate change, allowance must be made for the influence of external factors with regard to the assessing the outcomes achieved where in all other respects the OMP has been adhered to satisfactorily.

Vegetation condition

It is acknowledged that the condition of the grassy ground cover varies with micro-topography (gilgais, rocky rises etc.) and it is not expected that ground cover condition will be uniform across all monitoring plots but all plots should show improvement from the Year 1 surveys. If average Quality of the Offset area has improved by 1 point after 10 years, the key performance indicators will be considered to be met.

GSM population

Native flora and fauna are adapted to variable seasonal conditions and many display boom and bust cycles of reproduction. As such, it may not be possible to differentiate between a bust cycle and a decrease in GSM numbers due to management actions in any one particular year. The overall trend in GSM numbers should be referred to when assessing the success of the Offset area after 10 years.

3. Management commitments and actions

This section presents the specific management commitments, management actions, and timeframes for implementation, to be carried out to meet specific objectives to improve the Quality of the GSM habitat within the Offset area. The detailed schedule of management commitments, management actions and management targets is provided in Appendix 1.

The OMP aims to achieve gains in the Quality score of GSM habitat through on-ground actions undertaken by the Landholder and with a high degree of certainty of success. As a result, the management actions are designed to be straightforward, practicable and achievable within the existing land management context.

The specific management actions of the OMP have two distinct stages for improvement and then maintenance of GSM habitat Quality as follows:

- An intensive, 10-year program of management actions to be implemented from the commencement of the OMP. The management actions are directed at achieving an improvement in the ecological condition of the Offset area equivalent to a 1 point increase in Quality.
- A set of in-perpetuity land management commitments that will ensure that the improvement achieved in the first 10 years of the OMP is maintained over time.

These stages are described in the sections that follow and are supported by schedules of actions at the end of this document.

The prescribed management actions are in accordance with the *DELWP Output Delivery Standards for the Delivery of Environmental Activities* (DELWP 2015).

3.1 Management commitments

The management commitments are the over-arching land use commitments made by the Landholder with regard to the in-perpetuity management of the Offset area. The management commitments contribute to fulfilling the specific objectives for the Offset area and apply as long as the conservation covenant is registered on-title. The management commitments also direct what on-ground actions will be undertaken during the 10 Year intensive management and in-perpetuity management periods.

The following commitments have been reviewed and agreed to by the current Landholder. These commitments will be placed on title by the attachment of the OMP to the TfN covenant. Most commitments will apply immediately from the start of the OMP management period and continue in-perpetuity. In addition to the commitments applicable immediately, the grassland condition achieved as a result of the 10 year period of management, will be required to be maintained, in perpetuity.

The in-perpetuity management commitments of the OMP are as follows:

1. Retain all native vegetation:

- 1.1 *Permanently exclude all activities that would result in direct mechanical removal of native vegetation (excavation, geological exploration, ploughing of fire breaks, cultivation etc.). Direct-driving of posts to mark out the Offset area, monitoring plots or install low-impact fencing is permitted to the minimum extent necessary.*
- 1.2 *Permanently exclude all activities that would knowingly introduce new weeds, weed seeds or other non-indigenous vegetation into the Offset area. Examples include: over-sowing with pasture seeds or other pasture improvement; using hay, silage or other supplementary feed from outside Offset area that may contain viable weed seeds; planting of tree belts. It is acknowledged that not all weed invasions are within the control of the landholder.*

- 1.3 *Exclude all broad-acre herbicide application use for purposes not related to weed control for conservation as specified in this OMP (e.g. maintaining fence lines or other easements, creating fire breaks).*
- 1.4 *Exclude installation of additional farm infrastructure excepting low impact fencing needed to stock-proof the offset area or to delineate management zones (e.g. stockyards, higher impact fencing are not allowed).*

2. Protect native herb diversity and native groundcover tussock structure:

- 2.1 *Permanently exclude all fertilizer application.*
- 2.2 *Permanently exclude set-stocking of sheep.*
- 2.3 *Sheep grazing is permitted in the Offset area if it complies with the requirements detailed in this OMP.*
- 2.4 *Permanently exclude any other grazing by domestic livestock not described in this OMP (e.g. cattle, goats or horses).*

3. Implement management actions as detailed in this OMP:

- 3.1 *Secure Offset area for conservation via TjN conservation covenant registered on-title.*
- 3.2 *Years 1 to 10: implement works according to the OMP to achieve a 1 point gain in Quality for GSM habitat. The annual works plan must address:*
 - Fencing, signage & access
 - Adaptive management
 - Woody weeds
 - Herbaceous weeds
 - Pest animals
 - New or emerging threats
 - Grazing for biomass / weed control
 - Ecological burning
 - Inspections, monitoring and reporting
 - Emergency management
- 3.3 *Years 11+: Maintain an annual works plan for the ongoing maintenance of the condition (Habitat Hectares score) of the GSM habitat that was achieved at the end of Year 10. The annual works plan must incorporate methods to ensure that management actions continue to adapt to current conditions for weeds, pest animals, and biomass control as well as:*
 - Maintain fencing and signage.
 - Continued protection of large trees, herb diversity and native tussock grass structure.
 - Woody weeds maintained at <1% cover with no adult plants
 - Cover of herbaceous weeds does not increase beyond levels achieved at Year 10
 - Pest animals do not increase beyond levels achieved at Year 10
 - Biomass is maintained to achieve >20 to 40% cover of bare ground
 - Continued management of woody vegetation to maintain open GSM habitat.
- 3.4 *Revise OMP in response to either ineffective management actions, or improvements identified through on-ground evidence/external research and development, or in response to an incident or emergency.*

The implementation of these commitments provides the reasonable expectation that the Offset area will meet the specific objectives of GSM habitat Quality improvement over the period of the OMP's implementation.

3.2 Offset area management strategy

The key threats to the Offset area derive from the existing permitted uses associated with normal farming practices and the uncertainty created by a change in Landholder. The existing use rights are detailed in Section 2.4.1 and the associated threats are summarised as: inappropriate grazing regimes, pasture improvement, and fertiliser application.

Other threats to the Offset area derive from natural processes that must be managed with on-going works. In particular, expansion of the cover of existing high threat weeds, invasion of new high threat weeds, an explosion in pest animal numbers, expansion of existing areas of active erosion and the excessive accumulation of dead plant material through the over-growth of ground-layer plants (referred to generically throughout as 'biomass').

The broad objective of the management actions is to produce a decrease in the abundance of perennial weeds, maintain an open grassy groundcover structure, and maintain conditions that are suitable for the recruitment (seed production, germination and growth) of native plant species. While decreasing weed cover is an improvement in itself, it is anticipated that this will be accompanied by a commensurate increase in the abundance of native grasses and herbs, including native grasses that are known food plants for GSM. The management of any other parts of the property that are not within the Offset area are to be managed in a manner sympathetic to this broad objective.

Currently weeds and biomass are managed through grazing by sheep for much of the year. It is proposed that sheep grazing continue under a modified regime designed to provide improved conservation of the ecological values of the Offset area. This modified regime is referred to as 'pulse grazing' in this OMP. The term 'pulse grazing' (also referred to as 'crash grazing') is used to describe grazing that occurs at high intensity for a short period of time, followed by a period of rest. The pulses can be repeated multiple times within a season to manipulate the growth patterns of particular types of grasses or herbs and therefore favour desirable species in preference to undesirable species (e.g. weeds). In addition to sheep grazing, an intensive weed and pest management program will be implemented for the first 10-years of the OMP. If the Landholder chooses, ecological burning can be gradually introduced should extra biomass control be needed, however follow up weed control will be essential.

The management actions each have a target to be achieved by the end of the 10-year management period. The management actions and their targets apply to the entire Offset area. However, it is acknowledged that topographic variation (e.g. gilgais and rock areas) over the extent of the Offset area will produce variation in condition of the Offset area. This variation will be captured in the placement of the permanent monitoring plots and each target will be measured as an average across the whole Offset area. The results of the individual management actions will together provide the improvement in Quality required under the management commitments.

3.3 Offset area protection (security)

At the commencement of this OMP, the Offset area will be secured in-perpetuity via a conservation covenant registered on-title under Section 3A *Victorian Conservation Trust Act 1972*. The statutory body that regulates the *Victorian Conservation Trust Act 1972* is TfN and the covenant is known as a Trust for Nature covenant.

A TfN covenant has standard provisions, which bind the owner to managing the land for conservation purposes. In addition, this OMP will be registered on-title as an attachment to the covenant. As a result, the OMP will be binding on the current and any future owners of the Offset area. Details of the security arrangement are shown in Table 10 below.

Table 10 On-title conservation covenant arrangements

Details of security mechanism	Date or other details
Type of security:	Covenant under part Section 3A Victorian Conservation Trust Act 1972
Trust for Nature covenant registered on-title:	DD / MM / 2020
Commencement date for on-title protection:	Upon the on-title registration of the covenant
Commencement date for OMP management actions to improve offset Quality:	Upon the on-title registration of the covenant
Expiry date for OMP management actions to improve offset Quality:	10 years after the on-title registration of the covenant
Expiry date for maintenance of offset Quality at end of 10 management period	Nil - see in-perpetuity commitments in Section 3.1
Review of OMP in response to event or changing conditions	As required

3.4 Offset area protection (threat abatement)

The following actions will be undertaken by the landholder or their contractor to establish the Offset area as a conservation area (Appendix 1). The actions are once-off tasks that are required to set up the Offset area. These tasks are considered separately from the yearly management works that will be required after the Offset area is established.

3.4.1 Boundary fencing

The offset area has existing permanent boundary fencing of a stock-proof standard and able to exclude neighbouring domestic livestock from the property. Where sheep can access the Offset area from adjoining land, the adjoining land must also be grazed in accordance with this OMP. If instead, the existing land-use rights need to be fully exercised in the parts of the paddock not under an offset agreement, stock-proof fencing between the farmed areas and the Offset area will be required. Fencing should meet the minimum standard set by DELWP detailed in *Output Delivery Standards for the Delivery of Environmental Activities* (DELWP 2015).

Where fencing is installed on the boundary of or within an Offset area, the following requirements for the installation of fencing must be followed to ensure minimal disturbance to the Offset area:

- Fencing will use plain wire or electric wire only. Barbed wire is not permitted as it is a hazard to wildlife.
- All fence posts (strainer posts and stays) are to be direct-driven into the ground. Excavation for concrete footings is not allowed within Offset areas.
- Any new gates are to be as wide as possible to avoid disturbance associated with the funnelling of sheep through a confined space.
- Where fencing is installed within an Offset area (e.g. to define management zones), strainer posts and stays will be the minimum number needed.

In the event of the Offset area being affected by a rapidly increased rabbit population that cannot be controlled to an adequate level (based on advice from TfN) then the Offset area fencing will need to be upgraded to a rabbit proof standard (DELWP 2015).

3.4.2 Temporary fencing to aid conservation management

To aid conservation management of the Offset area, additional temporary fences can be used within the Offset area. Temporary fencing is fencing that is not intended to be in place longer than the duration of the grazing season.

Temporary livestock fencing will be established and maintained around the boundary of any burnt area within the Offset area for at least 6 months post-burn to prevent stock access and damage to regenerating vegetation from grazing.

Temporary livestock fencing can be established to delineate smaller cells for higher intensity grazing if this is required. The temporary fencing must have negligible impacts to native vegetation associated with the placement and removal of that fencing.

Fencing will use plain wire or electric wire only. Barbed wire is not permitted as it is a hazard to wildlife.

3.4.3 Other farm infrastructure

No new farm infrastructure or easements are allowed within the Offset area. This includes facilities for livestock such as watering points or yards or easements for linear infrastructure such as pipelines or power-lines.

If temporary infrastructure is required to manage sheep grazing such as temporary fencing around burnt areas or portable troughs, the Landholder is to discuss this with TfN to ensure that it will not adversely affect the Offset area.

All existing and proposed infrastructure for erosion control designed to protect the offset site will be maintained to the extent where the defined offset area will not suffer any loss of GSM habitat as a result of accelerated soil erosion (i.e. tunnel erosion and sheet erosion). If areas are impacted to the point where GSM habitat is considered lost, equivalent alternative areas need to be added to the nominated offset area to the satisfaction of DAWE.

3.4.4 Signage and access control

Direct-driven posts or other low-impact permanent marker, will be installed at the commencement of the OMP to clearly identify the boundary of the Offset area. This is required for auditing, monitoring and management purposes. Posts will be located in accordance with advice from a qualified ecologist to ensure impacts to native vegetation are avoided.

The Offset area remains private property and access or disturbance to the Offset area by unauthorised persons is prohibited. The existing access gates and security arrangement is adequate while the management is being undertaken by the Landholder and his regular staff and contractors. Should the property be sold or new contractors be engaged, signs will need to be placed on the gates to the paddock in which the Offset area is located. The signs will alert farm workers to the protected status of the paddock and that works are strictly limited to the management actions in this OMP. At a minimum, the signs will state to the effect: "Conservation Area – Access not permitted unless strictly authorised by the manager".

No external signage identifying the property as an offset area is proposed in this OMP but could be considered by the Landholder at their discretion. Conservation-related signage has potential to inadvertently attract undesirable impacts.

Monitoring of access will be conducted on an ongoing basis with fencing repaired or upgraded as required.

3.5 Offset area improvement (Year 1 to Year 10)

This section provides the specific management actions and timeframes for implementation, to be carried out to meet specific objectives to improve the Quality of the GSM habitat within the Offset area. The detailed schedule of management commitments, management actions and management targets is provided in Appendix 1.

3.6 Annual works plan

The annual works plan is the key process for implementing the principle of adaptive management used to minimise the risk of the Offset area being unsuccessful. Adaptive management is discussed in greater detail in section 3.7.2 and section 5. Prior to works towards the management actions being undertaken each year, the annual works plan (based on the schedule in Appendix 1) will be reviewed and updated in consultation with TfN. The updates will be based on the results of the management actions implemented the previous

year and any new research or advice that may arise. To enable adaptive management, the review should identify which management actions in the previous year were successful in contributing to achieving the management target but also which actions were ineffective. The annual works plan will need to be updated based on what actions were effective and where relevant, to address any ineffective management actions.

If the management actions were ineffective, it will be necessary to determine the reason why they were ineffective. The most common reasons why a management action was ineffective include the following:

- Incorrect implementation (e.g. herbicides applied at the incorrect rate).
- Insufficient time has passed to determine effectiveness (The management action was not expected to work yet).
- There were seasonal conditions that rendered the management action ineffective (e.g. drought year).
- Management action produced an unexpected result (e.g. emergence of a new weed after ecological burning).

It may also be determined that the management action is generally not the most effective method for achieving the management target and would be better achieved using a different method. Where the management action is deemed to be generally not effective, the Landholder should discuss alternatives with TfN.

The annual works plan will also address any new or emerging issues, even if not anticipated in this OMP or not listed in the schedule in Appendix 1.

The Landholder should be consulted and sign-off on the annual works plan if it is prepared by their manager or other delegate.

3.7 Strategy for biomass / organic litter control

Biomass management is essential to maintain indigenous flora and fauna values throughout the Offset area. The term biomass relates to the amount of plant material (dead or alive) covering the ground. Once the biomass has died, it forms a layer of dried organic litter on the surface of the grassland. The amount of biomass in one year therefore determines the amount of organic litter build up that carries over to the next year. Management of biomass and litter are therefore interrelated.

In the absence of a process to reduce biomass or the resultant litter, the dry conditions experienced in Australia mean that the organic litter builds up over time and threatens the condition of the grassy groundcover. Factors that influence the amount of biomass and organic matter include: seasonal conditions, presence/absence of fire, amount of grazing by herbivores, and the plant species present, with weeds generally growing faster and producing more biomass than native plant species. Biomass management is therefore required regardless of whether weed control is also required. However, controlling highly productive weeds can also assist in biomass management.

In native grassy woodlands, biomass management is required to ensure that grasses do not dominate all the space in the ground cover so that inter-tussock spaces are maintained. Where there are insufficient inter-tussock spaces, native grasses will shade out native herbs and prevent them from photosynthesising, flowering and setting seed. Sufficient inter-tussock spaces are also required by GSM, which favours an open groundcover for breeding. Biomass management is also a method of weed control as discussed in section 3.7.1.

3.7.1 Grazing for biomass / organic matter control

Grazing will be the primary management method to manage ground cover biomass and organic litter within the offset area. Grazing will be done through the application of pulse grazing followed by a grazing exclusion period each year. The grazing exclusion period is required to allow native grasses and herbs to flower and set seed without grazing pressure from sheep. Grazing pressure from kangaroos cannot be controlled by the

Landholder, however, it will need to be considered in drought conditions as the Offset area is likely to have higher grass cover than other parts of the landscape and so attract kangaroo grazing in dry periods. It is also acknowledged that there is a tension between optimal weed management using grazing and the grazing exclusion period, which may prevent grazing at the optimal time to manage some late growing weeds. This is discussed below with regard to control of Brown-top Bent *Agrostis capillaris*. The use of ecological burning for biomass control is discussed in the sections below.

To inform the grazing strategy employed each season, biomass and organic litter will be surveyed using routine inspections by the Landholder in consultation with TfN. Ecological monitoring will also assess the effectiveness of the biomass control techniques applied and the need for any adjustments to the management actions.

The management target for biomass/organic litter is to reinstate a more natural tussock structure, which is currently grazed to a short lawn. The management targets are as follows:

- Cover of native medium tufted graminoids increases to ideally 40% – i.e. native grasses allowed to mature and flower at a height of greater than 10 centimetres.
- Inter-tussocks spaces maintained within the range of 20 to 40% bare ground.
- Organic litter at 10 to 30% cover. Where there is a sustained build up in biomass over any one year, resulting in a reduction of inter-tussock space to an average of less than 20%, biomass will need to be actively reduced.

Currently the Offset area is subject to sheep grazing throughout much of the year. The result is that all native flora species are flowering/maturing almost at ground level rather than at their natural height. To reduce the impact of grazing, sheep grazing will be converted to a pulse grazing system. Biomass control will be consistent with the standards for management of ecological grazing provided by DELWP (2015).

To ensure the conservation values of the grassy woodland are protected, there will be strict restrictions on the grazing activities that are allowed within the Offset area. Grazing of domestic livestock will be restricted to sheep only. Grazing by any other domestic livestock is specifically excluded in the in-perpetuity management commitments in this OMP.

The timing of grazing will be strictly controlled to allow native species to grow and set seed over the spring to mid-summer period (DELWP 2015). Sheep will be excluded from the start of spring to the middle of summer annually, in perpetuity. While the start of the spring growing season is best judged on the ground on a yearly basis, Table 11 provides targets to be met for ongoing management of grazing within the Offset area, including dates for the grazing exclusion period. The only exceptions to requirements specified for pulse grazing is to allow for an ecological burn or if additional strategic grazing is needed to address a specified weed problem. For ecological burns, a fire management plan produced to inform when grazing will be removed to allow for a build-up in biomass to establish a burn. For strategic grazing, see the adaptive management discussion in the paragraph below.

Each pulse grazing event will occur over a short duration and allow for periods of grazing exclusion. The maximum length of continuous grazing is 3 weeks with a minimum 5 weeks rest between cycles. The rest period will need to be judged by the Landholder to ensure native grasses have recovered sufficiently prior to reintroducing sheep.

Grazing intensity needs to exceed the standard stocking rate to provide grazing pressure sufficient to ensure all plant species are grazed evenly in a short amount of time and to prevent selective browsing. The stocking rate will be dependent on the seasonal conditions and the amount of feed available and so cannot be stipulated in this OMP.

Depending on seasonal conditions, at least three pulse grazing cycles will occur within the grazing period, one of which will occur immediately prior to the exclusion period (weather permitting).

Table 11 Requirements and limit of grazing activities within the Offset area

Requirement	Target
Grazing exclusion period (sheep grazing generally not permitted*)	15 th September to 31 st January annually* (4.5 months)
Pulse grazing period (sheep grazing generally permitted in accordance with this OMP)	1 February to 14 th Sept (7.5 months)
Number of rotations	3 or more (dependant on conditions)
Minimum rest from grazing between pulse grazing	5 weeks
Maximum continuous pulse grazing	3 weeks (2 weeks or less preferred)
Biomass management thresholds	Total vegetation cover of approx. 70% (maintain within range of 60 to 80%)
Target inter-tussock space	Approx. 30% of total bare ground cover (maintain within range of 20 to 40%)

* As per adaptive management, strategic grazing may be allowed during this period for specific conservation related purposes.

Grazing will not occur in very wet conditions where pugging will cause unacceptable levels of damage to soil and grassland structure or result in more than 30% bare ground within the Offset area. The Offset area will need to be monitored during wet periods to prevent excessive soil damage in seasonally wet areas. Following any high rainfall events, stock will be removed immediately. Grazing will not occur in very dry conditions where grazing will destroy the tussock structure of the grassland and result in more than 30% bare ground within the Offset area.

Weed hygiene will be important to minimise the risk of sheep introducing new weed problems into the Offset area. Sheep moved into the Offset area will be selected and timed to minimise the potential for weed seed transport via mud, attachment to their fleece or within their faeces. Ideally, sheep will be shorn before entering the Offset area, and will otherwise be kept in paddocks with low weed levels. Sheep will be contained in a low weed area and allowed to shed weed seeds for at least 24 hours before entering the Offset area. Stock movements into the Offset area will be excluded within two days of rainfall and new stock brought onto the property will be excluded from use in the Offset area until shorn.

3.7.2 Adaptive management of grazing

A grazing regime is made up of three factors that are known to influence plant growth: season, duration and intensity of grazing. The correct implementation and fine-tuning of the pulse grazing regime will be essential to the success of the Offset area. Season of grazing will be controlled by the grazing exclusion period with a protocol put in place to allow strategic grazing where needed during the exclusion period. Duration and intensity of the grazing will be controlled by the Landholder and will be adapted to meet season conditions on an annual basis but also throughout the grazing period. Duration refers to both the length of grazing and the length of rest. Intensity refers to the stocking rate within the area being grazed. Grazing should be adapted to meet seasonal conditions, to learn from the experience of previous years or in response to further research or information on grazing in native grasslands. The Landholder is required to keep records of stocking rate and duration to ensure that the results of grazing can be adapted over time.

3.7.3 Grazing protocol for exclusion period strategic grazing

Management of biomass from excessive growth of weeds and to prevent weeds setting seed, may require strategic grazing to occur within the grazing exclusion period. Grazing within the exclusion period can occur under a limited set of circumstances in consultation with TfN. Grazing within the exclusion period will be limited to strategic crash grazing within the areas of the Offset area affected by a specified problem. Such strategic crash grazing will need to meet the following requirements:

- A risk assessment is made (based on the current seasonal conditions) to compare the benefits of the proposed grazing with the risks of not grazing, and the risks associated with undertaking the grazing.
- The strategic crash graze is to be done for conservation purposes only. Reasonable reasons include unusual seasonal conditions resulting in unusual amounts of plant growth, specific weed management objectives.
- Under no circumstances can the crash graze be done for the primary purpose of benefiting agricultural production (e.g. commercial considerations or feed requirements).
- At no time should a change in grazing be undertaken where it poses a threat to the biodiversity values of the grassy ground cover (e.g. very wet conditions that could cause pugging).
- Prior to introducing the sheep, the Landholder is to document with photos and notes in writing as to the specific reason why the crash grazing is to be implemented. This should include information to show that a risk assessment at point 1 above has been done.
- This information is to be provided to TfN prior to introducing the sheep.
- If possible, the grazing strategy should be developed in consultation with TfN. It is acknowledged, however, that strategic grazing needs to be timed precisely so that TfN resourcing constraints may mean that a response is not received before the time when the grazing needs to occur. This should not preclude the Landholder from undertaking adaptive management if all other dot points above are complied with.

Further discussion of pulse grazing is provided in Section 3.9, especially with regard to targeting particular grassy weed species that may require grazing during the exclusion period.

3.8 Use of fire for ecological management

The controlled application of fire is an efficient and cost-effective alternative technique for reducing biomass in grasslands/ grassy woodlands and can be effective at reducing weed cover, especially for species that are difficult to control. Periodic burning that is followed by spot spraying can be an important strategy for difficult to control weed species such as perennial grassy weeds or widespread annuals. Importantly, burning (c.f. grazing or slashing) allows greater access and efficiency for weed control and increased natural regeneration of indigenous plant species. While burning may enhance germination of native species, it can also promote weed species to germinate, however, stimulating the soil stored weed seed bank and then applying follow-up weed control is seen as positive as this allows this seed bank to be exhausted over time.

However, burning also has risks involved that must be managed carefully to avoid creating further problems. The reduction in biomass, increased open space, increased soil nutrients that can follow an ecological burn means that weeds often germinate in high numbers shortly after a burn. Because weeds generally grow faster than native species, if weeds are not controlled immediately after a burn, then there is a risk that weed cover will increase as a result of the burn. The timing of any burning also needs to consider the habitat requirements of GSM and therefore burning is prohibited from the beginning of the GSM flight season (typically about November) until the end of January.

3.8.1 Ecological burning for biomass control

Ecological burning can be used to manage biomass and organic litter. The general ecological burning requirements described in the section below apply to all burns undertaken.

The management target for biomass/organic litter will contribute to maintaining the vigour of the grassy ground cover and allowing adequate space for recruitment of native flora. Biomass management will also improve the openness of the sward to encourage a greater amount of GSM breeding activity and therefore increase the GSM population. The management targets are as follows:

- Inter-tussocks spaces maintained within the range of 20 to 40%.

- Organic litter at 10 to 30% cover. Where there is a sustained build up in biomass over any one year, resulting in a reduction of inter-tussock space to an average of less than 20%, biomass will need to be actively reduced.

3.8.2 General ecological burning requirements

The following section provides guidelines for use of burning only for the purposed of ecological management of biomass and weed control only. Fuel hazard reduction burning is excluded from the Offset area. It should be noted that in some wet years burning may not be possible prior to seed set due to a combination conditions and restrictions.

A fire management plan is to be completed in consultation with TfN and/or the advising ecologist as part of the annual works plan. Any approved fire plan will be provided to TfN at least three weeks prior to any burning event identified within that plan.

Any ecological burns will be conducted during benign (low wind and mild temperature) weather conditions. Burning within the Offset area will be undertaken only with due consideration to relevant health and safety issues. Ecological burning should only occur outside the prescribed declared fire danger period for the region and therefore is unlikely to require a permit. However, the Country Fire Authority should be consulted if there is any doubt about the permit requirements to undertake planned burning. The Landholder is responsible for ensuring the requirements of this OMP are carried out only if compliant with all other government planning requirements and permits. Any planned burns will minimise the potential for fire to spread in an uncontrolled manner.

All parts of the Offset area are suitable for burning, however, the extent of the burn needs to determined based on what is feasible for follow up weed control (as could be determined by a trial burn). For weed control, selected areas of grassland may be burnt to tackle particular weed issues or to assist in the lowering of soil nitrogen and phosphorous, which would also assist in weed control works. For biomass control, selected areas of grassland will be those where biomass is approaching the upper limit allowed under this OMP (70 to 80% cover).

No area is to be burnt more frequently than every three years. After each burn, the Landholder will prepare maps identifying the fire history of the Offset area to ensure the time since an area was last burnt can be documented. If wildfire should happen to occur in the Offset area, this will also need to be recorded in the fire history.

At no time should the entire Offset area be burnt in a single season and burning should never be done in a manner which could endanger the large old trees or adjoining wooded areas. Large trees should be protected from burning because they are likely to be severely damaged or killed if they ignite and fire is carried to the crowns via hollow trunks.

The application of a mosaic burning regime is the preferred burn pattern and therefore any individual burn should not burn all vegetation within the Offset area. Nevertheless, any burns must be planned to meet the requirement to maintain adequate fauna habitat within the Offset area. Planned burns therefore will be restricted to no more than 50% of the Offset area within any 12 month period. Patchy burns are a desirable outcome and an array of small burnt and unburnt patches covering up to a hectare is an appropriate scale on which to gauge the success of the burn.

The extent, intensity and timing of burns must take into account the presence of threatened species, in particular GSM. Fire may kill individuals of GSMs during the warmer months of the year when they are active above the soil surface. Timing of burns should only be undertaken outside the GSM flight season (generally November to January) unless fires are conducted at a small and limited scale. Late spring burns can be implemented if less than 20% of the Offset area is impacted.

Burnt areas will be protected from grazing for at least 12 months to allow species regeneration and recruitment to occur. Temporary fencing should be erected around burn areas if grazing is to be implemented in the surrounding areas.

3.9 Weed control

The management targets for weed control are shown in Table 12 below and further information is provided in the sections that follow.

The weed control strategy is a multi-pronged approach that takes advantage of the ecological conditions of the Offset area. The weed control strategy focuses on ensuring that the ecological conditions stay favourable to native plant species while limiting the growth and reproduction of weed species as well as directly treating weed infestations. This strategy provides the native species with opportunities to recolonise the areas that were previously occupied by weeds once the weeds have been killed. The weed control strategy is similar to that used for well-managed native pastures making the weed control strategy practical and feasible within the agricultural context of the Offset area.

The weed control strategy aims to achieve the following outcomes:

- Maximise recruitment opportunities for native plants species by providing decreased competition from weeds for space, light, nutrients and water.
- Minimise recruitment and reduce recruitment conditions that favour weeds by:
 - *Maintaining sufficient (60% to 80%) ground cover. Insufficient ground cover, resulting in excess bare ground, from over-grazing, post-fire or drought provides increased opportunities for weed seeds to germinate and grow.*
 - *Minimising nutrient enrichment.*
 - *Directly killing weeds prior to seed set with herbicide or physical removal. Chemical free methods of weed control such as steam weeding or flame weeding can also be used.*
 - *Limiting the yearly growth of weeds to minimise the total space they occupy in the Offset area and to prevent excessive build-up of organic litter (i.e. dead grass) that can smother the growth of seedlings and other plants.*
 - *Limiting the yearly growth of weeds at the correct time to also prevent seed set.*
 - *Trialling the use of fire to encourage germination of soil stored weed seed and exhaust the soil weed seed bank.*

Note that while this OMP lists management targets for particular weed species, the target species are likely to change over time. The abundance of weeds will change in response to seasonal conditions, in response to grazing or in response to controlled burns (e.g. post-burn flush of broad-leaf weeds) and new weeds may emerge as a result of wind or animal-mediated seed dispersal or germination of soil-stored seed. The management actions for weed control must be adapted to meet the changing conditions. Weed cover and weed species will need to be monitored by both the Landholder and in yearly ecological monitoring with management adapted in response to the monitoring results. The document *DELWP Output Delivery Standards for the Delivery of Environmental Activities* (DELWP 2015) provides information about acceptable weed control activities for conservation activities. However, for any new or emerging weeds or weeds requiring new management methods, TfN will be consulted for site-specific advice and approve the control techniques.

Table 12 Management targets for weed control

Scientific Name	Common Name	Average cover 2019	Proposed control measures	Management Target for cover 2030
Woody weeds				
<i>Rosa rubiginosa</i> , <i>Marrubium vulgare</i> , <i>Ulex europeus</i>	Sweet Briar, Horehound, Gorse	<1%	Cut and paint or other appropriate application of appropriate herbicide. Mechanical removal only if low impact.	Eliminate all established adult plants, regeneration/seedlings <1%**
Short-lived perennial grasses				
<i>Anthoxanthum odoratum</i>	Sweet Vernal-grass	<1%	Targeted slashing to prevent seed set and reduce biomass. Ecological burning to reduce biomass. Spot spraying appropriate herbicide (or non-chemical methods if available) to prevent seeding.	<1% (prevent any expansion of existing infestations but preferably eliminate)
Annual grasses				
<i>Vulpia</i> spp., <i>Briza</i> spp., <i>Bromus</i> spp., <i>Aira</i> spp., <i>Avena</i> spp.	Fescue, Quaking-grass, Brome, Air-grass, Oats	15%	Targeted slashing to prevent seed set and reduce biomass. Ecological burning to reduce biomass. Spot spraying appropriate herbicide (or non-chemical methods if available) to prevent seeding. Crash grazing to reduce seed set	<10%
High threat herbaceous weeds				
Perennial tussock grasses: <i>Phalaris aquatica</i> , <i>Cynodon dactylon</i> , <i>Juncus acutus</i>	Toowoomba Canary-grass, Couch, Spiny Rush	1%	Targeted slashing to prevent seed set and reduce biomass. Ecological burning to reduce biomass. Spot spraying appropriate herbicide (or non-chemical methods if available) to prevent seeding.	<1%
Broad-leaved weeds: primarily <i>Cirsium vulgare</i> , <i>Carthamus lanatus</i> , <i>Erodium</i> spp. and <i>Hypochaeris radicata</i>	Primarily Spear Thistle, Saffron Thistle, Heron's-bill and Flatweed	1-5%	Spot Spraying appropriate herbicide (prevent flowering). Ecological burning to germinate seed.	1%
Perennial mat-forming grasses: <i>Agrostis capillaris</i>	Brown-top Bent	5 - 10%	Time-controlled pulse grazing by sheep to prevent seed set and reduce biomass (may require grazing within grazing exclusion period). Spot spraying appropriate herbicide (early spring).	<5%
Total		<30%		<20%

**It is expected that seedlings may re-establish from time to time due to the re-introduction of seeds by birds and other animals or re-sprouting of trunks after previous year's treatment. Inspections at Year 10 should not detect any established adult plants

3.9.1 Woody weeds

Woody weeds were recorded within the Offset area but all species were recorded as isolated or small groups (<10) plants only. The total cover of woody weeds was less than 1% of the Offset area. Woody weeds are considered easier to control than herbaceous weeds due to their larger size, slower growth/recruitment, and their occurrence as small numbers of plants. The elimination of all established adult woody weeds is therefore considered practical within the 10 year management period. Woody weeds are generally spread by animals, including birds that have ingested the fruit / seeds, which makes the permanent elimination of all woody weeds unlikely. However, after the adults have been eliminated, weed control will focus on detection and treatment of new seedlings or any re-sprouting stumps that may occur following weed control. Woody

weeds that are detected either incidentally during site management or as part of monitoring activities, should be recorded with GPS and controlled / eliminated as soon as possible and before flowering and seed set. Using this approach, the cover of woody weeds is to be maintained at negligible levels in-perpetuity.

3.9.2 Annual weeds

Annual weeds were recorded throughout the Offset area. Annual grasses are present throughout the Offset area including Fescue *Vulpia* spp., Quaking Grass *Briza* spp., Bromes *Bromus* spp., Hair Grass *Aira* spp. and Wild Oat *Avena* spp. while annual broad-leaved weeds like Cape Weed *Arctotheca calendula* and Heron's-bill *Erodium* spp. are concentrated around high traffic areas such as the high points in the landscape. Annual pasture species such as Subterranean Clover *Trifolium subterraneum* and Rye-grass *Lolium rigidum* are present throughout.

Annual weeds are not considered a key threat to the conservation values of the Offset area. However, uncontrolled growth of annual weeds can reduce the vegetation condition and Habitat Hectares score by decreasing the Lack of Weeds score and Organic Litter score. Given this is the case, management will be directed at minimising the annual weed cover, at worst maintaining it at the existing level and minimising its growth and reproduction. Management using targeted grazing and/or ecological burning is expected to have an impact on the abundance of these species. However, seasonal conditions such as a wet winter followed by a late warm spring may produce growth rates in excess of what can be controlled with strategic grazing before the grazing exclusion period begins. The grazing provisions also allow for strategic grazing to be implemented during the grazing exclusion period under certain circumstances (section 3.7.4).

If grazing and ecological burning have not been able to constrain the spread of annual weeds, direct weed control methods should be applied as discussed below. If chemical weed control is proposed for annual weeds, its use should be evaluated against the risk of damage to non-target (native) plant species prior to application.

3.9.3 High threat herbaceous weeds (perennial tussock grasses, perennial broad-leaved weeds)

High threat herbaceous weeds are those that have potential to displace native species of the same type. For example, perennial grassy weeds like Toowoomba Canary-grass have potential to replace native perennial tussocks grasses like Kangaroo Grass *Themeda triandra*. The overall management objective is to ensure that all high threat herbaceous weeds are controlled to ensure that there is no increase in their cover where they currently occur, no further spread of these weeds into new areas of the Offset area, and where possible, to reduce their cover and abundance. The management targets for high threat weeds are set for weed species grouped according to growth form and status (Table 12).

As discussed above, grazing and ecological burning will be the principal control methods for these species. For unpalatable species or species where grazing is not sufficient to prevent their spread, herbicide or other methods will also be used as described below. Weed control will be a regular activity and undertaken generally in accordance with the schedule in Appendix 1.

3.9.4 Use of herbicide

Spot-spraying involves applying herbicide using a small nozzle so that only the target plant is treated. All spot spraying must be completed in a manner that minimises non-target damage by following all manufacturer's directions regarding rainfall and wind speed on the day of application. There will be no spot spraying in close proximity to threatened flora without protective measures in place (i.e. physical shielding). Spot spraying will be undertaken regularly, particularly in spring and early summer, with a focus on killing weed plants prior to seed set.

There are also a number of chemical-free weed control methods that could be trialled including steam weeding and flame weeding. The Landholder does not have experience with these methods so it is not a requirement that they be used. If, in consultation with TfN, a trial of chemical-free weed control is considered

worthwhile, this can be done within the requirements for adaptive management within this OMP since a move away from chemical usage would be considered to be of general benefit to the local environment.

The Offset area contains aquatic habitat in the form of a creek and dams. All chemicals should be used in accordance with manufacturer's directions when working near these waterways. Given the long history of herbicide use in the surrounding cropping areas, there is no specific runoff risk identified for the application of herbicides to the Offset area if used in accordance with the manufacturer's directions.

3.9.5 Options for control of Brown-top Bent

Brown-top Bent *Agrostis capillaris* has several biological characteristics that make it more difficult to control. Firstly it is a weed of low fertility soils so that it directly competes with other native grass species that are likewise adapted to low fertility soils. Secondly, its rhizomatous growth form means that it can survive undetected until it flowers as well as making it harder to target with spot spraying of herbicide and is less favoured by sheep. For the Offset area, control of Brown-top Bent will require a combination of herbicide application and strategic grazing and/or ecological burning.

The manufacturer's instructions for use of glyphosate (RoundUp) state that herbicide application alone is insufficient to kill the species and follow up management is required involving full disturbance with a tined implement 10-21 days after spraying and then re-seeding. Since this treatment is not possible within a conservation context, it is unlikely that herbicide alone will be effective.

Agriculture Victoria advises that for winter grazing, a change from set-stocking to rotational grazing will help to control Brown-top Bent by giving an advantage to more upright species such as tussock grasses. The control of Brown-top Bent will require the fine-tuning of the duration and stocking rate of the proposed grazing system as well as the duration of each rest period. These adjustments fit within the requirements of the OMP to adapt management to seasonal growth conditions. More information can be found at the following link:

<http://agriculture.vic.gov.au/agriculture/farm-management/pastures/developing-a-bent-grass-control-program>

The species responds readily to summer rainfall and so growth may remain static in drought years but increase rapidly over summer in wet years. Agriculture Victoria advises that in a wet year, grazing may be required late in the year to control growth that can occur after summer rainfall. Grazing will be most effective if done in the early flowering stage but before seed set. <http://agriculture.vic.gov.au/agriculture/farm-management/pastures/what-is-bent-grass>

A late grazing strategy would involve grazing within the grazing exclusion period of this OMP and so would need to be done in consultation with Trust for Nature. In areas where Brown-top Bent cover is highest and if herbicide application has been ineffective, late crash grazing to control growth can be trialled. The trial is to be within the affected areas only and only after confirming that no threatened flora or fauna species would be impacted negatively by the grazing. It is assumed that in years of high Brown-top Bent growth, the growth of native grasses will also be high and so will not suffer any long term effects from the grazing trial. The trial should be done in consultation with TfN who can monitor the effects of late grazing on native species as well as Brown-top Bent. If successful, the grazing can be repeated under the same restrictions in subsequent years.

3.9.6 New and emerging weed problems

A key management action will be to ensure procedures are in place that can detect any new weed species or emerging weed problems in time to take preventative action. The management actions are described in Appendix 1. The requirements comprise routine inspections by the Landholder (on-going), visits from TfN (on-going) and annual ecological monitoring (first 10 years of OMP). Any new or emerging weed problems are to be recorded with GPS or clearly marked in the field and treated as soon as possible. Records are to be kept of

any new or emerging weeds identified, the treatment applied and follow up inspections of the treated weeds. Where possible, new and emerging high threat weeds (noxious weeds or known environmental weeds) will be eradicated from the Offset area. However, if the weed is already established by the time it is detected and cannot be eradicated in must be controlled to less than 1% cover.

The surrounding landscape is the most likely source of new weeds so that it is advisable to have weed monitoring and treatment schedules for the rest of the property (although this cannot be enforced via the OMP or TfN covenant). This is likely to be a cost effective way to reduce weed loads in the Offset area. Public land can also be a source of weeds (e.g. council managed road reserves) and it would be prudent for the Landholder to alert the relevant authority to any weed problems on public land adjoining the property.

An example of an emerging weed is South African Orchid *Disa bracteata*. This species appears capable of rapid spread and may displace many native geophytes. Actions to control this species should be prioritised.

3.10 Pest animals

The *Catchment and Land Protection Act 1994* requires that Landholders must take all reasonable steps to prevent the spread of - and as far as possible eradicate - established pest animals on their land. In addition to this legal duty, the control of declared pest animals including rabbits and other pest herbivores is a requirement of this OMP.

Foxes, rabbits and hares must be monitored and controlled throughout the year. Activity by European Rabbits *Oryctolagus cuniculus* was not evident during site visits.

Pest management should use an integrated approach such as is described in *Output Delivery Standards For The Delivery Of Environmental Activities* (DELWP 2015). For rabbits, an integrated approach involves fumigation, hand collapsing of burrows and baiting. Ripping of rabbit warrens within the Offset area is not permitted. If any warrens develop within the Offset area, they are to be treated by low impact measures such as fumigation or implosion. Remove any carcasses to prevent poisoning of native predators. In the event of an explosion in the rabbit population, rabbit-proof fencing of the Offset area will need to be considered as control options for these pests.

To aid pest management within the Offset area, the Landowner should aim to control rabbit activity on their land within 500 m of the Offset area including removing all active rabbit warrens, shrubby environmental weeds (e.g. Gorse, Sweet Briar) and remove any unnecessary stockpiles or rocks or other materials (although this cannot be enforced via the OMP or TfN covenant).

Other problem pest animals may include mice, cats and foxes that may find shelter in crops, rock formations and rock walls within and adjacent to the Offset area. The Landholder will select from the range of control techniques available and apply the most effective in the local conditions. Control works targeting these pest animals are not expected to have any negative impact on any MNES.

3.11 Understorey diversity and recruitment

The grassy ground cover of the Offset area already supports a relatively high number and diversity of native plant species. The management actions associated with plant diversity therefore aim to protect the existing plant diversity and encourage its growth and recruitment.

The main risks to understorey diversity in the Offset area once it is protected by the TfN covenant will be: over-grazing (either by sheep or other introduced herbivores), uncontrolled weed growth and the accumulation of biomass over a prolonged period (greater than a year). Since all three risks are addressed in the previous management actions no further mitigation measures are required to manage native plant diversity and recruitment.

There is currently no need to do any supplementary planting or revegetation within the Offset area. The Habitat Hectares assessment shows that the Offset area retains between 50 and 90% of the expected number of understorey lifeforms, and is generally not considered deficient in terms of the species diversity of the life-forms that are present. Missing or deficient elements are typically the large herbs or graminoids, which is often a function of the growth stage of the plants present.

If the Landholder wished to undertake works for the reintroduction of native species now considered locally extinct, a risk assessment of the activity will need to be done in consultation with TfN. The risk assessment will need to include the likelihood of:

- Introducing new weeds or plant diseases, which can be brought in on potting mix from nursery-grown seedlings;
- Disturbance to the Offset area by digging holes to plant seedlings; and
- Introduction of weed seeds in seed mixes or machinery.

3.12 Offset area maintenance (Year 11-onwards)

At the end of Year 10, ecological monitoring will determine the condition of the GSM habitat using Habitat Hectares and the results of GSM surveys. The condition measured at the end of 10 years must be maintained in perpetuity to ensure that GSM continues to be provided with a conservation benefit. The following ongoing management actions will apply in-perpetuity and align with the management commitments listed in Section 3.1.

As the responsible authority for TfN covenant, it will be the responsibility of TfN to provide advice, stewardship and monitoring to assist the landowner in fulfilling his obligation under the covenant requirements and the requirements of this OMP.

The Landholder agrees to undertake the following on-going management actions listed in the following table (Table 13).

Table 13 Summary of on-going management actions (Year 11 onwards)

Management action	On-going requirement
Access and signage	<ul style="list-style-type: none"> • Routine inspections to check the condition of fencing and any signs. • Maintaining the existing paddock fencing and signage including the arrangement of gates, unless otherwise authorised by TfN as appropriate.
Weeds	<ul style="list-style-type: none"> • Routine inspections to look for and detect any new and emerging weeds and eliminate to < 1% cover. • Ensuring that overall weed cover does not increase beyond the levels attained at the end of the 10-year management period either.
Pest animals	<ul style="list-style-type: none"> • Routine inspections to look for and detect pest animals, particularly rabbits, hares, foxes and cats; • Ensuring that size of the pest animal population does not increase beyond the levels attained at the end of the 10-year management period.
Biomass	<ul style="list-style-type: none"> • Manage biomass so that bare ground stays at its current level of 20 to 40% cover. • Manage organic litter to meet the EVC benchmark cover of 10% - 20%.
Grazing exclusion	<ul style="list-style-type: none"> • High intensity, short duration (known as 'crash' or 'pulse') grazing of sheep only. • Grazing excluded from 15th September to 31st January, under ideal conditions. • Use of strategic crash grazing can be considered during the grazing exclusion period under the specific circumstances described in section 3.6.4. • Ensuring the in-perpetuity exclusions in Section 3.1 continue to be apply.

3.13 Contractor requirements

Due to the sensitive nature of the working environment, contractors working with Offset area are required to be suitably qualified and experienced. All workers should be familiar with the restrictions associated with working within a conservation area prior to starting works. This can be in the form of a site induction or supervision by the Landholder. Note that the contractor requirements apply to all of the establishment, improvement and on-going management actions.

3.13.1 Required qualifications

All management works are to be carried out by the Landholder (their delegate) or their contractor. All unsupervised contractors should be suitably qualified and experienced and familiar with the Offset area. For labourers being supervised by a suitably qualified contractor, the labourers should be carefully supervised until the Landholder or supervisor is satisfied that the contractor is suitably skilled at the required tasks.

All ecological monitoring of vegetation should be undertaken by a suitably qualified professional ecologist who has at least 3 years of experience in assessment of native grasslands and grassy woodlands. All GSM surveys should be overseen by a suitably qualified ecologist who has experience in identifying GSM for field surveys.

DAWE defines suitably qualified person as follows:

- Suitably qualified person means a person who has professional qualifications, training, skills and/or experience related to the nominated subject matter and can give authoritative independent assessment, advice and analysis on performance relative to the subject matter using the relevant protocols, standards, methods and/or literature.

3.13.2 Required independence

The suitably qualified ecologist undertaking the monitoring must have sufficient independence to objectively assess the results of management actions and therefore cannot be employed by the same contractor engaged to implement the management actions. DAWE also has requirements for auditors to be independent. Please refer to any approval conditions for EPBC Act referral 2015/7516 for auditor requirements.

3.13.3 Site inductions

For contractors that are unfamiliar with the Offset area, the Landholder (or delegate) should provide site inductions to ensure that any contractors undertaking management works within the Offset area are aware of the allowed activities and work methods. Site inductions should include the following key information:

- The Offset area is a conservation area that is protected by federal legislation.
- There are fines associated with damage to the grasslands and grassy woodlands.
- A work order with specific tasks or a list of works permitted in the Offset area.
- A list of works prohibited in the Offset area.
- Weed hygiene protocols to avoid introducing new weeds on boots, vehicles, plant or equipment.
- All vegetation within the Offset area is protected (other than weeds). Protected vegetation includes native grasses and wildflowers, sedges and rushes, mosses and lichen.
- Surface rocks should not be disturbed as these provide habitat for native reptiles.
- Works should have a minimal impact on the grassland and efforts should be made to avoid leaving wheel ruts due to driving in wet conditions or otherwise disturbing the grassy ground cover.
- The emergency management and reporting procedures for Incidents. Note to contractors that possible or actual damage to the grassy ground cover counts as an Incident along with weather-related, bushfire, accidents or medical emergencies.

3.13.4 Contracts

For engagement of new contractors, the Request for Tender or Request for Quote should include a requirement to comply with the relevant provisions in the OMP. The Landholder should request details of the contractor's experience with undertaking works in native grasslands. The services contract should include requirements for compliance with the relevant provisions on the OMP or include requirements to comply with all instructions regarding protection of native plants and animals within the offset area.

4. Monitoring actions

This section presents the nature, timing and frequency of monitoring to determine the success of management actions against key performance indicators. The detailed schedule of monitoring actions is provided in Appendix 1.

Surveillance of the Offset area is an integral component of the regular management actions. Routine inspections and ecological monitoring are separate activities in the OMP but both are important for early identification of changes, allowing an appropriate and timely management response to matters which would otherwise undermine the objectives of the OMP. Routine inspections include observations by the Landholder during normal activities within the Offset area and broader property and which are important for maintaining a record over the entire year that is not possible during annual ecological monitoring events. Ecological monitoring is undertaken by qualified ecologists who will collect data from repeat surveys of permanent monitoring plots to assess the overall improvement in Quality over time.

4.1 Routine inspections undertaken by landholder

The progress of management works will be surveyed and recorded by the Landholder on a regular basis. Most of these records are normally kept in the course of land management activities but the requirement to keep these records has been formalised in this OMP for the Offset area specifically.

The Landholder will provide a progress report to TfN and DAWE on an annual basis. The report will utilize the compiled records of observations and management works as described below.

4.1.1 Records of management works

The Landholder must keep a diary of any management actions/works undertaken within the Offset area. The works will include weed control, pest animal control, fence maintenance and stocking rates and duration of grazing. These records of all management actions must be kept to provide evidence of the implementation of the OMP.

4.1.2 Records of routine inspections

The Landholder is to undertake regular site inspections in accordance with the schedule in Appendix 1 (at a minimum once every 3 months, with additional requirements to inspect grazing results during the grazing period, Appendix 1). During the site inspections the Landholder is to record general observations including on fence condition, weed levels and biomass levels and well as the location and management requirements of any problems observed during the inspections.

As part of these notes, the Landholder must record any observations that could influence or initiate a management response. It is helpful to allocate a timeframe to undertake the identified management response. e.g. “seedlings of a new woody weed seen in the middle of the Offset area today. Will spot spray these with glyphosate by the end of the week”. The Landholder should also record any new or emerging weed problems or if any weed species have been eradicated. These details provide valuable information on the management of the Offset area and contribute to the records that detail the commitment of the Landholder to the OMP.

Some specific requirements are detailed in Table 14 below.

Table 14 Routine inspection requirements each quarter

Management action	Routine inspection requirement
Fence condition	Surveys of the property boundary fence must be conducted quarterly, and when visiting the Offset area to do other monitoring or management actions. Any damage to the fence that may allow vehicles or stock to enter outside of the parameters outlined in this OMP must be repaired immediately.
Weed monitoring	<p>Once a year in spring, the entire Offset area should be surveyed for woody weeds, by walking and / or driving throughout the area such that a visual inspection (including with binoculars) would detect the presence of any woody weeds. Complete coverage of the Offset area will likely require at least six hours of survey. All infestations or individual woody weeds will be mapped with a GPS, and the locations will be supplied to the weed management contractor/Landholder for treatment. Subsequent surveys will then revisit previously mapped infestations to evaluate the success of weed control, as well as inspecting the entire Offset area for new infestations.</p> <p>While conducting the woody weed surveys, notes will be taken regarding the cover of herbaceous weed species, (estimated to the nearest 5%). Species and areas suitable for targeted treatment (such as spot spraying), will be mapped and supplied to the weed management contractor/Landholder for treatment.</p>
Pulse grazing inspections	To inform the annual works plan, the Offset area should be inspected to determine biomass and pulse grazing requirements for the coming season. During the grazing period, the Landholder will inspect the grazing cells to evaluate grazing effectiveness at reducing biomass and weed levels, and to determine grazing duration. Records are to be kept on grazing intensity (stocking rate) and duration during the grazing period each year.
Pest animal monitoring	Signs of pest animals (rabbits, hares and foxes) will be recorded when visiting the Offset area. In particular, the locations of any active rabbit warrens must be mapped using GPS, and the locations supplied to the pest animal management contractor/Landholder for treatment. Subsequent monitoring will then revisit previously mapped warrens to check for on-going use, as well as searching for new warrens throughout the Offset area.

4.2 Routine visits and oversight provided by Trust for Nature

More general supervision/monitoring of the offset site will be undertaken by TfN to ensure the grassy ground covers response to management actions produce the desired outcome outlined by this OMP.

On an annual basis, TfN will liaise with the Landholder regarding the development of an annual works plan in accordance with management actions in Appendix 1. TfN will visit the Offset area a minimum of four times over the 10 year management period (of years 1, 3, 7 and 10). This level of monitoring is the minimum that TfN can commit to as advised in their review of a previous draft of the OMP. TfN can commit to at least one site visit to be undertaken in spring with the other visits undertaken throughout the year, although spring is the best time to assess grassland condition. Further site visits can be requested by the Landholder as needed to address specific management problems or to discuss the progress of the Offset area. During Years 11 to 20, TfN will visit the Offset area a minimum of once every five years. Further site visits can be requested by the Landholder as needed during Years 11 to 20.

On an annual basis, the Landholder provides an annual report to TfN, which is in the form of a template based on the schedule of management actions in Appendix 1. TfN reviews the annual report before releasing funding to the Landholder for works completed. This process ensures that the works are undertaken in accordance with the OMP each year of the 10 year management period or funds are withheld until the works are completed to a satisfactory standard. After the 10 year management period has been completed, TfN has a statutory responsibility to monitor compliance with the TFN covenant. Since the OMP is attached to the covenant, TfN also provides oversight of the OMP.

4.3 Ecological monitoring undertaken by qualified ecologists

Suitably qualified ecologists as defined in section 3.13 must be engaged to undertake ecological monitoring on a regular basis according to the schedule in Appendix 1. The monitoring will include assessments that require expert skills such as Habitat Hectares assessment that cannot be undertaken by the Landholder.

4.3.1 Control plots

To determine if management actions have been effective, it is necessary to have a baseline and a control against which to compare the treatment areas. Monitoring done without control plots can only record change over time but does not provide a way to link the management actions to the changes recorded. To address this problem, the Landholder will allow some small exclusion plots to be installed prior to any management actions being undertaken. Three exclusion plots scattered across the offset area will be installed in consultation with a suitably qualified ecologist. These will be 20 metres x 20 metres and fenced with chicken wire to prevent herbivore grazing as the existing plots show this has been sufficient to exclude most grazing. No weed control works will be undertaken in these plots. The plots can be removed at the end of the 10 years of management if required.

4.3.2 Vegetation condition

Ecological monitoring of the condition of vegetation will be undertaken annually in spring, ideally at the peak flowering time for native grasses. The first monitoring event should occur in 2020 prior to introduction of conservation management. This will provide a baseline or “before” measure against which the results of future management actions can be compared.

The monitoring will consist of the following components:

- General site inspection and average Habitat hectare assessment. The walkover will take at least 7 hours and make notes on woody weed abundance, evidence of biomass management, herbaceous weed cover for target weed species and general condition (evidence of pests, new weeds etc.). This assessment will document the general overall condition of the Offset area and the ability of management works to maintain the condition of GSM habitat.
- Permanent monitoring points (10 over and above the controls) will be established throughout the Offset area, stratified by weed cover and topography. The plots will be a square 20 m by 20 m in size to allow for the detection of herb diversity during the monitoring. The plots will be clearly marked and their location accurately recorded using GPS.
- The following data will be collected from each plot and the control plots. It is estimated an hour will be required to collect these data from each plot:
 - *List of native and introduced species.*
 - *Total vegetation cover (%)*
 - *Total cover of native perennial vegetation (%)*
 - *Total cover of native herbs (%)*
 - *Total cover of perennial weeds (%)*
 - *Total cover of annual weeds (%)*
 - *Cover of bare ground (%)*
 - *Cover of organic litter (%)*
 - *Average height of vegetation (cm).*
 - *Habitat Hectares score.*
- A photo of each plot will also serve as permanent photo points. Using the NE corner of the plot for the photo point, a photo will be taken facing the four points of the compass (N, S, E & W).

Information will be collated as part of the annual reporting requirements (Section 4.4).

4.3.3 Golden Sun Moth monitoring

Monitoring during the flight season for GSM is necessary to evaluate the size of the population over time.

Baseline surveys of the GSM population were undertaken in the summer of 2019/20. It is recommended that GSM surveys be undertaken after one year of management has been achieved and then every second year thereafter for the duration of the 10 year management period. It is unlikely that management actions to encourage increased growth of GSM food plant species will have an immediate effect on GSM numbers, therefore, surveys every second year are considered sufficient to monitor the health of the GSM population. GSM surveys area therefore required in the following summers:

- 2021/22
- 2023/24
- 2025/26
- 2027/28
- 2029/30

Monitoring will record the number of individuals observed from set monitoring transects. A team of 4 people is likely to be needed to survey the entire Offset area in one day using 50 metre wide transects. The chosen method must be repeated exactly the same for each of the four visits done in a survey year (i.e. it is not acceptable to assess a quarter of the Offset area once in order to survey the whole Offset area in four visits).

Monitoring for GSM will be undertaken in accordance with the requirements of DEWHA (2009) with regard to survey season and weather conditions on the day of survey. As GSM are known to occur at this offset area no reference sites are required. The Landholder is likely best placed to watch for when the flight season has started but other GSM sites within the district can also be used. A monitoring event requires four visits to the Offset area on four days approximately one week apart. Surveys will take place when conditions are suitable for male flight (generally >20°C, bright, clear days, full sun, absence of rain and wind other than a light breeze) between 10:00 hrs and 15:00 hrs. Tracks will be recorded using a GPS receiving device and a waypoint taken for each location where GSM are observed. Notes on habitat condition including cover of food plants and inter-tussock spaces will also be recorded.

The results of these surveys will be compared to the original baseline surveys (2019 /20 flight season) and those of the previous monitoring event.

Any observations of GSM during monitoring for vegetation condition and during inspections by the Landholder or TfN will also be recorded.

4.3.4 Monitoring report

Once monitoring is complete, a monitoring report with the following information will be provided:

- Assessment of condition improvement of vegetation
- Results of GSM surveys (every second year).
- Advice on planned burning and weed/biomass control approach for the coming year.

The monitoring report is to be provided to the Landholder, SPG and TfN. It will be the responsibility of SPG to supply the ecological monitoring reports to DAWE as their annual compliance report.

4.3.5 Independent audits

The approval holder (SPG) must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister. In addition, as the approval holder, SPG is responsible for ensuring the implementation and effectiveness of the OMP.

If required, audits will be conducted by an independent ecologist appointed by SPG at the following stages:

- At the end of the first year of offset area management - this is to ensure that initial management actions are conducted to the satisfaction of the approval holder and DAWE, including implementing the legal security mechanism, ensuring the property is securely fenced, and that other initial management actions have commenced.
- At the end of the fourth year of offset area management – this will involve a review of four annual monitoring and management reports, as well as an independent assessment of the condition of GSM habitat within the Offset area.
- At the end of the eighth year of offset area management – as per the four year audit.
- Following the completion of the 10 year management period – to be a final audit of the implementation and effectiveness of the OMP.

Additional audits may be triggered as a result of a review of the OMP or following an environmental Incident resulting in significant change to site conditions, as identified in the risk assessment.

4.4 Reporting

The approval holder (SPG) must submit an annual compliance report to DAWE for the period of the approval. The detailed schedule of reporting is provided in Appendix 1.

As part of this reporting, the Landholder will prepare an Annual Report to address progress against the commitments set out in this OMP. Annual Reports will provide enough detail in the form of written comments and supporting evidence that an assessor can easily determine the completion of/progress against the management commitments and completion criteria for the Offset area. Reports will be submitted prior to the anniversary date of the execution of the OMP to allow time for compliance to be assessed.

The annual report will include:

- Details of management actions undertaken within the reporting period.
- Results of at least four routine inspections, including fence condition, weeds, pest animals, and biomass accumulation.
- Details of compliance or non-compliance with the schedule of management actions (Appendix 1).
- Details of compliance or non-compliance with management targets (Appendix 1).
- Details of any incidents or new and emerging management issues, with required corrective action.
- Any triggers exceeded and which corrective actions were implemented.
- Details of ecological monitoring results including photos from photo points and GSM survey results in relevant years.

The reporting schedule is detailed in Appendix 1.

5. Risk assessment and adaptive management

5.1 Risk assessment

Table 15 on the following pages uses the DAWE risk framework to assess the risk of the KPIs not being met. The risk of the KPIs not being met is assessed by comparing two scenarios: a situation with an approved OMP and a situation without an approved OMP. This is done by identifying a hazard based on each KPI. The risk assessment then provides a summary of how the management actions provide control measures for each of the hazards identified. This allows the risk of the offset failing to meet the KPI's to be reduced. The risk assessment also details the residual risk after the control measures in the OMP are put in place. A strategy for addressing the residual risk is provided in the last column.

The likelihood and consequence classification is summarised in Appendix 2.

5.2 Emergency management

There is residual risk posed by emergency events such as wildfire, floods resulting in significant erosion or unexpected pest outbreak. These events present a risk of damage to the Offset area, because emergency activities may involve any of the following:

- Extreme change in conditions requiring rapid adaptation of management actions and/or management targets (e.g. rapid change from unburnt to burnt in the case of wildfire).
- Emergency works such as earthworks to plough or excavate firebreaks or control significant erosion events.
- New threats previously absent to the Offset area (e.g. new weeds brought in during emergency works).
- Previously controlled threats becoming more prevalent (e.g. rapid increase in existing weed cover).
- Unauthorised access, livestock grazing or trespass (i.e. as a result of fences being destroyed).

While the likelihood of an emergency management scenario occurring over the life of the OMP is rare, the consequences could be Major and resulting in a risk assessment of Medium. The risk assessment of Medium is based on the impacts that emergency management actions can have on the protected matters, especially ploughing of fire breaks.

5.3 Emergency Contacts and procedures

Should any emergency occur, the relevant contacts (listed below) must be notified as soon as possible.

- In the event of a life-threatening emergency, the relevant emergency services should be contacted immediately. Emergency services must be advised of the conservation protections to avoid inadvertent damage (e.g. ploughing fire breaks, use of chemical fire suppressants).
- SPG is required to notify DAWE of any incident within 10 days so that the Landholder must notify SPG and DAWE within this timeframe.
- A delegate of the Landholder (e.g. farm manager) must notify the Landholder within 12 hours and the Landholder must notify TfN within 24 hours.

5.4 Emergency contact details

- Bushfire or other life-threatening emergency: Phone 000, ask for fire brigade
- Non-emergency criminal activity (illegal dumping, trespass): Phone Victoria Police 131 444
- Department of the Environment and Energy (DAWE): Phone 1800 803 772
- Trust for Nature: Offset advisor phone (03) 8631 5888
- Landholder (or their representative): Paul Dettmann

5.5 Review of OMP

This OMP includes an adaptive management framework so that a review of the OMP will only be necessary under the following circumstances:

- A major incident that makes a significant change to the character or condition of the Offset area requiring updates to management targets or KPIs (most likely wildfire, Table 15).
- The Landholder / TFN identifies a beneficial permanent management change such as might arise from new research or on-ground observations and requiring updates to permitted activities or management actions.

If a review required by the Landholder or after a major incident, this will be undertaken by the Landholder in consultation with TfN and DAWE.

If a review is required by DAWE as part of the conditions of approval, the review will be undertaken by SPG.

Table 15 Risk assessment of potential hazards as defined by Key Performance Indicators

Potential hazards as defined by Key Performance Indicators (KPIs)	Likelihood	Consequence	Risk Level	Management action # (see Appendix 1)	Hazard Control Methods	Likelihood	Consequence	Risk Level	Residual risks	Management strategy for residual risks
	Without OMP								With OMP	
Failure to register TfN agreement on relevant land titles	Unlikely	Major	Severe	1, 15	<ul style="list-style-type: none"> Statutory approval condition for LVRD DAWE post-approvals team to regulate execution of approval conditions 	Rare	High	Low	The risk assessment of low is based on the Offset area being identified prior to the approval and secured using a TfN covenant. The funds for the Offset area are only release by TfN after the Credit Trading Agreement has been finalised. This provides a strong financial incentive for both the Landholder and approval holder to ensure the security mechanism is placed on title.	If the TfN covenant is not registered on title, TfN will hold the funds in trust until a TfN agreement is registered.
Failure to implement the OMP to the required standard. (NOTE: for the other risks in the table, when assessing the risk, it is assumed that the OMP has been implemented to the required standard.)	Likely	High	High	5, 6, 14, 15	<p>Checks and balances in place to ensure OMP is implemented to the required standard:</p> <ul style="list-style-type: none"> TfN review of annual report from landholder each year. Release of annual funding from TfN only when satisfied works have been undertaken in accordance with the OMP Ecological monitoring undertaken yearly during 10 year period TfN to visit offset area a minimum of four times during 10 year period TfN to visit offset area every 5 years after Year 10 Independent audits undertaken as directed by DAWE The TfN covenant binds the current and future Landholder to both the standard restrictions in the TfN covenant and to the requirements described in this OMP 	Rare	High	Low	The risk assessment of low is based on the oversight provided by TfN. TfN reviews the annual report before releasing funding to the Landholder for works completed. This process ensures that the works are undertaken in accordance with the OMP each year of the 10 year management period.	In the event that the landholder fails to undertake the management actions in accordance with the OMP, TfN will withhold funds until the works are completed to a satisfactory standard.
Loss of GSM habitat over 20 year time horizon	Likely	High	High	2, 3, 15	<ul style="list-style-type: none"> OMP provides a schedule of ten detailed management commitments to change land management and protect native vegetation in OMP and TfN covenant Offset owner required to maintain erosion control infrastructure to a high standard 	Rare	Moderate	Low	The risk assessment of low is based on the resourcing being provided to the offset area and the proper maintenance of surrounding erosion control infrastructure. That is, Biosis has observed that for grassland/grassy woodland reserves throughout Melbourne and Victoria, loss of native vegetation is usually attributable to insufficient funding to provide for the intensity of management required to address the labile nature of native grasslands/grassy woodlands. Where there is insufficient intensity of management, this has led to invasion of perennial grassy weeds, which dominate the tussock structure. Since the offset area has a dedicated manager (the Landholder), regular monitoring, and funding available to undertake the required works, it is expected that only exceptional climatic conditions or an emergency event would lead to a loss of GSM.	Emergency management provisions are provided in the OMP. Incident reporting procedures of the OMP will also apply - TfN and the consulting ecologist will be consulted for advice, DAWE will be informed and the OMP will be reviewed by the landholder.
Preventable weed introductions over 20 year time horizon	Likely	High	High	2, 3, 15	<ul style="list-style-type: none"> OMP provides a schedule of ten detailed management commitments to change land management and protect native vegetation in OMP and TfN covenant 	Unlikely	Moderate	Low	The risk assessment of low is based on the monitoring and oversight of the offset area such that any introduction of new weeds will be detected early and management actions undertaken to rectify the problem. N.B. This risk addresses preventable weed introductions only (such as weed seeds brought in on vehicles or machinery) so that the source of the introduction can be traced and prevented in future. Non-human mediated introduction of weeds by fauna or wind-blown seed are addressed in "new or emerging threats".	Preventable weed introductions over 20 year time horizon will be addressed using the adaptive management provisions in the OMP and in consultation with TfN. The management actions in Appendix 1 detail the process by which to address new or emerging threats.
Unauthorised access or works within offset area	Possible	Major	High	3, 4, 15	<ul style="list-style-type: none"> OMP provides a schedule of management actions to control access and authorise works within offset area 	Unlikely	Moderate	Low	The risk assessment of low is based on the Offset area being fully fenced and not accessible by the public or easily trespassed upon due to its distance from the road so that contravention of the covenant by malicious damage to the Offset area is Low risk. Signage and site induction will ensure that any workers will be aware of the activities allowed in the offset area.	Since unauthorised access would most likely be a result of trespass, this will be referred to police and will be addressed using the emergency management provisions in the OMP. Where unauthorised access or works within offset area result in an incident, the incident reporting procedures in the OMP will be followed.

Management actions fail to adapt to seasonal conditions or monitoring/routine inspection results.	Likely	High	High	5, 15	<ul style="list-style-type: none"> Landholder to prepare annual works plan in consultation with TfN and incorporating monitoring results and information from routine inspections. 	Rare	High	Low	The risk assessment of low is based on the adaptive management provisions in the OMP being designed to allow the landholder to ensure there are no adverse impacts from management during unfavourable conditions such as drought. Should management actions fail to keep pace with changing conditions, the most likely cause will be extreme seasonal conditions or weather events.	Routine inspections will be used to track seasonal conditions and/or emerging threats. The annual works plan will address the management actions required for the coming season. TfN will be consulted where management actions do not appear to be effective and their advice sought on how to address any problems. For extreme events, the emergency management provisions will apply instead.
Failure to improve Lack of Weeds score or Lack of Weeds score declines.	Likely	High	High	7, 8, 11, 12, (13)	<ul style="list-style-type: none"> Management actions provide multiple methods of weed control that can be implemented in response to changing conditions. OMP provides an adaptive management strategy to allow the landholder to respond to changing the weed levels. Management actions for weed control compatible with other management targets. Options for weed control in OMP are: <ul style="list-style-type: none"> Pulse grazing Herbicide application Non-chemical weed control methods Ecological burning (optional for Offset area) 	Unlikely	High	Medium	This risk assessment of medium is based on the difficulty of controlling weed invasions once a particular weed species is well established. The circumstances when this could occur include unpredictable extreme climatic or weather event or a post wildfire weed outbreak. In such cases, review of the OMP would be warranted to address the failure to improve the Lack of Weeds score.	In the event that the management actions even in accordance with the OMP fail to improve the Lack of Weeds score in any one year, TfN will be consulted for advice. In the event that the management actions even in accordance with the OMP fail to improve the Lack of Weeds score in consecutive years, and no reason for this can be identified, the OMP will be reviewed by the landholder.
Failure to eliminate new weeds, emerging weed problems not controlled to <1% cover, failure to eliminate new pest animals	Possible	High	Medium	6, 10, 15	<ul style="list-style-type: none"> Management actions provide process to Identify and control or eliminate new or emerging threats complimented by oversight by TfN 	Rare	High	Low	This risk assessment of low is based on early detection of new or emerging threats leading to effective control or elimination of the threat.	The management actions in Appendix 1 detail the process by which to address new or emerging threats. Where new or emerging threats are not treated promptly and allowed to proliferate, this will be considered a failure to implement the OMP to the required standard and addressed by TfN as above.
Loss of GSM food plant cover or inadequate inter-tussock spaces, with associated decline in Understorey score N.B. Loss refers to dieback or death of established tussocks rather than changes in projective foliage cover due to pulse grazing or season, the latter being captured using inter-tussock space data	Possible	High	Medium	2, 3, 4, 7, 8, 9, 10, 11 12, (13), 14, 1	<ul style="list-style-type: none"> OMP provides a schedule of ten detailed management commitments to change land management and protect native vegetation all of which are designed to protect native herb diversity and improve cover of native grasses. OMP provides detailed schedule of management actions all of which consider the need to protect native species diversity. Oversight provided by TfN and ecological monitoring annually will record and track vegetation condition. 	Unlikely	Moderate	Low	This risk assessment of low is based on the relatively robust nature of native grasses, the principle component of GSM habitat, when compared with native herbs. The circumstances when a loss of native tussock grass cover could occur include unpredictable extreme climatic or weather event or a post wildfire weed outbreak. N.B. Loss refers to death of established tussocks rather than changes in projective foliage cover due to grazing or drought. In such cases, review of the OMP would be warranted to address the failure to improve the habitat score.	The management actions in Appendix 1 provide a detailed strategy to manage grassy groundcover condition. In the event that the management actions even in accordance with the OMP fail to maintain the Understorey score in any one year, TfN and the consulting ecologist will be consulted for advice, DAWE will be informed and the OMP will be reviewed by the landholder.
Failure to maintain/increase Organic litter score	Likely	Moderate	Medium	8, 11 (12, 13)	<ul style="list-style-type: none"> OMP provides two options for biomass control, pulse grazing with exclusion period and optional ecological burning. OMP provides an adaptive management strategy to allow the landholder to respond to changing the biomass levels. Management actions for biomass control compatible with other management targets. 	Unlikely	Moderate	Low	The risk assessment of low is based on biomass being relatively easy to manage and rectify and therefore space for organic matter is also relatively easy to manage.	Management actions in Appendix 1 provide a strategy to manage grassy groundcover condition. In the event management actions in accordance with the OMP fail to maintain organic litter score in any one year, TfN will be consulted for advice. In the event that the management actions fail to improve the organic litter score in consecutive years, and no reason for this can be identified, the OMP will be reviewed by the landholder.

Failure to eliminate active rabbit warrens or fox dens, evidence of pest animal impacts present	Possible	Moderate	Medium	9	<ul style="list-style-type: none"> Offset area already has a low density of pest animals. OMP provides process for monitoring and treating pest animal populations. Oversight provided by TfN and ecological monitoring annually will record and track evidence of pest animal impacts. 	Unlikely	Moderate	Low	The risk assessment of low is based on pest animals and their impacts being relatively easy to detect and monitor and is undertaken as part of farm management in the rest of the property as well.	Management actions in Appendix 1 provide a detailed strategy to manage pest animals. In the event that the management actions fail to maintain pest animal numbers in any one year, TfN will be consulted for advice. In the event that the management actions fail to manage pest numbers in consecutive years, and no reason for this can be identified, the OMP will be reviewed by the landholder.
Failure to maintain Tussock cover sufficient to provide fauna habitat after ecological burns	Possible	Major	High	(12, 13)	OMP provides clear guidelines for ecological burning requirements. Burn plans will be developed as part of annual works plan in consultation with TfN. Ecological monitoring will track weed levels post-burn.	Rare	Major	Medium	This risk assessment of medium is based on the large scale on which a burn would have to occur for this target not to be met (i.e. more than 50% of the offset area to be burnt in any one year). The most likely cause of a large-scale burn would be escape of a controlled burn, which would be a rare occurrence.	For an escaped burn, the emergency provisions and incident reporting of the OMP will apply. TfN and the consulting ecologist will be consulted for advice, DAWE will be informed and the OMP will be reviewed by the landholder,
Failure to undertake ecological monitoring in accordance with OMP	Highly Likely	Moderate	High	14	Ecological monitoring remains the responsibility of the approval holder. TfN to review annual report from landholder each year and release funding only when satisfied works have been undertaken in accordance with the OMP	Unlikely	Minor	Low	The risk assessment of low is based on the approval holder remaining responsible for ensuring the ecological monitoring is undertaken and the oversight provided by TfN. SPG has agreed to be responsible for engaging an ecologist to undertake monitoring each year during the 10 year management period.	In the event that the ecological monitoring is not undertaken in accordance with OMP, the cause of the failure will be investigated and rectified prior to the next monitoring season (annually for vegetation or alternate years for GSM surveys).
Failure to undertake reporting in accordance with OMP	Highly Likely	Moderate	High	16	Ecological monitoring report remains the responsibility of the approval holder. TfN to review annual report from landholder each year and release funding only when satisfied works have been undertaken in accordance with the OMP	Unlikely	Minor	Low	The risk assessment of low is based on the approval holder remaining responsible for ensuring the ecological reporting is provided and the oversight provided by TfN.	In the event that reporting is not undertaken in accordance with OMP, the cause of the failure will be investigated and rectified prior to the next reporting season (annually for landholder annual report and vegetation or alternate years for GSM surveys).
Failure to undertake emergency management in accordance with OMP	Possible	Major	High	17	OMP provides emergency management procedure. Offset area will have signage to alert emergency services to conservation values within offset area.	Rare	Major	Medium	The risk assessment of medium is based on the large impacts that emergency management actions can have on native vegetation, especially ploughing of fire breaks. However, the frequency of emergency events is expected to be rare and the risk has been reduced compared to the current conditions of no OMP.	Failure to implement the emergency provisions of the OMP will likely result in an incident and the incident reporting provisions of the OMP will apply. TfN and the consulting ecologist will be consulted, DAWE will be informed and the OMP will be reviewed by the landholder if the offset area is affected.
Failure to maintain habitat hectares score achieved at the end of Year 10 from Year 11 to Year 20 (to achieve 20 year time horizon)	N/A	N/A	N/A	18	The TfN covenant binds the current (and future) Landholder to the standard restrictions in the TfN covenant and to the requirements described in this OMP. TfN to visit offset area every 5 years after Year 10. Adaptive management procedure ensures management can response to changing conditions over time.	Possible	High	Medium	This risk assessment of medium is based on the difficulty of improving conditions once they start to decline when compared to simply maintaining conditions. Failure to maintain the habitat hectares score would likely be derived from one of two sources: unpredictable extreme event or insufficient inputs to maintain the vegetation condition, both of which have been addressed above.	The annual works plan will address management actions required for the coming season including routine monitoring. In development of the annual works plan, TfN will be consulted where management actions do not appear to be effective and their advice sought on how to address any problems. TfN will visit the offset area at least twice from Year 11 to Year 20 period and require annual reports to be submitted for review to ensure compliance continues. For extreme events, the emergency management provisions will apply.
Failure to review OMP when circumstances change or management actions become ineffective	N/A	N/A	N/A	19	OMP allows both the landholder and the approval holder to review the OMP and make changes as needed. TfN will provide advice on management to landholder in the event management actions become ineffective.	Unlikely	Moderate	Low	The risk assessment is low because failure to review the OMP after a change of circumstances/due to ineffective management actions would be a failure to implement the OMP to the required standard, which is addressed above.	The OMP provides the details of how and when the OMP is to be reviewed and updated.

N/A = Not applicable, the KPI is only possible if the OMP is in place.

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Appendices

Appendix 1 Schedule of management actions

Table A1 Schedule of management actions and management targets

Legend to table:

Start management action	Progress towards target	Achieve target	Maintain result	As needed	Undertaken by external party
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Mana	Timing of activity	Roles and responsibility	Management results to be achieved	Yr: 0	1	2	3	4	5	6	7	8	9	10
				2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
1	Register the Offset area on title													
	Immediately upon OMP commencement. See OMP commencement in Section 1.	Landholder to register TfN covenant on title	TfN covenant registered on title in accordance with Section 3A <i>Victorian Conservation Trust Act 1972</i> Covenant to cover 121.0 ha											
		Landholder to provide copies of title to SPG within 2 weeks of registration being completed												
		SPG to provide title to DAWE within 4 weeks of registration												
2	Implement management commitments to change land management and protect native vegetation in OMP and TfN covenant													
	Immediately upon OMP commencement. See OMP commencement in Section 1.	Landholder to ensure all excluded activities no longer permitted within Offset area	Permanently exclude all activities involving mechanical disturbance (excavation, geological exploration, ploughing of fire breaks, cultivation etc.). All posts to be direct driven Permanently exclude all activities that would knowingly introduce new weeds/weed seeds, e.g. over-sowing or other pasture improvement using hay, silage or feed that could contain viable weed seeds planting of tree belts. Exclude all broad-acre herbicide use except in accordance with OMP. No creating fence lines or firebreaks with spraying. No farm infrastructure except in accordance with OMP (e.g. no yards, barbed wire fencing etc) Approval is obtained from TfN for any new farm infrastructure not in accordance with OMP All workers are aware of activities that are not permitted in offset area No unauthorised access or unapproved works within offset area Weed hygiene protocol developed for sheep, workers, vehicles, plant and equipment											
3	Implement permanent changes to grazing													
	Immediately upon OMP commencement. See OMP commencement in Section 1.	Landholder to ensure all grazing is in accordance with OMP	Permanently exclude all fertilizer application. Permanently exclude all cattle and horse grazing. All sheep grazing to be in accordance with OMP, see section bellow											
4	Prevent uncontrolled livestock grazing and unauthorised access. Install fencing for Offset area if needed													
	Prior to commencement of Year 1 grazing period	Landholder to ensure all fencing and signage is installed and maintained in accordance with OMP	Fencing installed on boundary or within Offset area must meet the following requirements : <ul style="list-style-type: none"> • Direct-driven posts only, no concrete footings • New gates are as wide as possible • Plain or electric wire only • Minimum number of strainer posts Refer to DELWP (2015) for stock-proof fencing standards if new stock-proof fences are needed											

Mana	Timing of activity	Roles and responsibility	Management results to be achieved	Yr: 0	1	2	3	4	5	6	7	8	9	10
				2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
			Install signage on gates to restrict access into offset site. e.g. "Conservation Area – Access not permitted unless strictly authorised by the manager".											
			Use low impact method to mark boundary off offset area where it is not marked by fencing											
			Undertake regular repairs to prevent uncontrolled sheep grazing or access											
			Fencing, gates and signage maintained to prevent accidental access by livestock or people											
5	Prepare and implement annual works plan													
	Annually, prior to commencement of each grazing period	Landholder to prepare annual works plan in consultation with TfN and incorporating monitoring results and information from routine inspections.	Review results from routine inspections and monitoring, determine management requirements for coming season in timely manner											
		Landholder to ensure overall progress/results are reviewed at least once per year.	Identify areas for improvement, incidents or changing conditions											
		Landholder to ensure works plan adapts to seasonal conditions and/or new or emerging threats	Prepare annual works plan based on review											
			Identify suitably qualified staff or suitably qualified contractors to undertake works. All work to be undertaken by/supervised by suitably qualified individuals											
			Provide site induction to new staff or contractors											
			Seek advice from TfN, CMA, ecologist or other contractor, if necessary											
6	Routine inspections and records of works													
	Minimum of once per quarter (4 times per year)	Landholder to ensure routine inspections record are undertaken at regular intervals	Undertake routine inspections of Offset area at least once every three months											
		Landholder to records are kept of all routine inspections	Identify any maintenance requirements for external paddock fencing, signage. Note if additional impacts from livestock movements become apparent around gates, fencelines or watering points.											
		Landholder to records are kept of all works undertaken in the offset area	Records are kept of any maintenance requirements and timeline for repair.											
			Records are kept of all routine inspections											
			Use GPS to record any weed infestations to target for treatment, new or unknown weeds/pests or weeds/pests that appear to be increasing											
			Record any pest sightings or evidence of pest activating											
			Use GPS to record the location of active rabbit warrens or fox dens											
7	Control woody weeds													
	July–Nov or as detailed in the annual works plan	Landholder to ensure annual works plan details target species, methods and timing of woody weed control	Search offset area and use GPS to record location of woody weeds (at least once per year). Record any areas to target for herbaceous weed control at the same time.											
		Landholder to ensure woody weeds are controlled using minimal impact methods and in accordance with OMP	Treat woody weeds using appropriate herbicide at correct time of year and to prevent fruiting and seeding. Refer to manufacturer's instructions or seek advice from TfN or weed contractor if needed.											
		Landholder to ensure woody weed mapping is undertaken at least once per year.	Treat woody weeds with methods that have minimal impact on native species											
		Landholder to ensure woody weed control starts in Year 1 and the management target is met by Year 2 and then maintained.	Avoid off target damage to native species											
			Eliminate all established adult plants by end of Year 2											
			<ul style="list-style-type: none"> After Year 2, continue treat woody weed seedlings/resprouting stumps to achieve the management target of <1% cover of woody weed seedlings at end of Year 10 											

Mana Whiri Kōwhiri	Timing of activity	Roles and responsibility	Management results to be achieved	Yr: 0	1	2	3	4	5	6	7	8	9	10
				2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
8	Control herbaceous weeds													
	July–Nov or as detailed in the annual works plan	Landholder to ensure annual works plan details target species, methods and timing of herbaceous weed control	Determine target weed species/groups for each season, determine treatment method (grazing/herbicide/combination/other)											
		Landholder to ensure herbaceous weeds are controlled using minimal impact methods and in accordance with OMP	Determine number of spot spraying/chemical free weed control events required and record in annual works plan											
		Landholder to ensure herbaceous weeds control starts in Year 1 and management target is met by the end of Year 10	For spot spraying, determine appropriate herbicide/rate and record in annual works plan											
			For grazing, determine seasonal requirements and record in annual works plan											
			Treat herbaceous weeds with appropriate method at appropriate season according to annual works plan.											
			Avoid off target damage to native species											
			Targets for all areas:											
			• Woody weeds: <1%											
			• Perennial tussock grasses (E.g. Phalaris): <1%											
			• Noxious grassy weeds (e.g. Serrated Tussock): eliminated if found											
			• Broad-leaved high threat weeds (e.g. Thistles): <1%											
			• Annual weeds: <10%											
			• Perennial mat-forming grasses (e.g. Brown-top bent): <5%											
			• Sweet Vernal-grass: <1%											
9	Control pest animals (e.g. rabbits, hares, foxes)													
	Feb–Apr, Sep–Nov or in accordance with annual works plan	Landholder to ensure annual works plan details target species, methods and timing of pest animal control	Determine pest animal control requirements and record in annual works plan. A minimum requirement is quarterly spotlighting searches.											
		Landholder to ensure pest animals are controlled using minimal impact methods and in accordance with OMP	Treat pests with appropriate method at appropriate season, record results in accordance with annual works plan. A											
		Landholder to ensure pest animal control starts in Year 1 and management target is met by the end of Year 10	Treatment methods will be in accordance with OMP and will not cause damage to the grassland. E.g. no ripping of rabbit warrens. Refer to DELWP (2015) for details on low-impact methods											
			Rabbit warrens fumigated within three weeks of detection.											
			Record any incidental sightings											
			• By end of Year 2, no active rabbit warrens within offset area, minimal surface harbour in the form of woody weeds											
			• By end of year 10 there should be no fresh ground disturbance by pest animals (particularly rabbits) observed in the offset area or active rabbit warrens or fox dens.											
10	Identify and control or eliminate new or emerging threats													
	Routine monitoring, treatment as needed	Landholder to ensure routine inspections record any new or emerging threats (including expanded areas of tunnel erosion).	Routine inspections undertaken according to OMP and all new and emerging threats are identified early.											
		Landholder to ensure incidental sightings of any new or emerging threats are recorded.	Identify correct treatment and treat infestation appropriately											
		Landholder to ensure appropriate treatment methods is identified and implemented where new threat is identified	For unknown weeds/pests, consult appropriately qualified person to establish identity											
			If possible, identify source of new infestation, change procedures to prevent further infestations if within control of Landholder											
			For unknown weeds/pests, consult appropriately qualified person to establish identity											
			Adaptive management used to update procedures in response to new or changing conditions											
			If not already established (not reproducing in the site) threat should be eliminated.											
			If already established, threat should be minimised to <1% cover											

Mana	Timing of activity	Roles and responsibility	Management results to be achieved	Yr: 0	1	2	3	4	5	6	7	8	9	10
				2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
			Target to be achieved from Year 1 onwards: <ul style="list-style-type: none"> New weeds eliminated, emerging weed problems controlled to <1% cover, new pest animals eliminated 											
11	Use pulse grazing for biomass/weed control													
	Exclude grazing from 15th September to 31st January each year	Landholder to ensure pulse sheep grazing is in accordance with OMP at all times: Total vegetation cover of approx. 70% (maintain within range of 60 to 80%)	Annual works plan prepared prior to grazing period each year. Determine feed availability/target weed species and adapt grazing strategy to seasonal conditions, record strategy in annual works plan											
	Rotational pulse between 1 February to 14th September each year (grazing adapted to seasonal conditions within these dates)	Landholder to consult with TfN periodically to discuss effectiveness of grazing strategy	Use pulse grazing during grazing period to graze target weeds before seed set											
	Maximum grazing duration: 3 weeks	Landholder to ensure stocking rate and grazing duration are recorded	Record to be kept of stocking rate and grazing duration and compared with results of grazing in annual review											
	Minimum rest period: 5 weeks	Landholder to inspect results of grazing on regular basis (at least 6 times during grazing period and twice during exclusion period)	If needed, use strategic pulse grazing during exclusion period to control a specified weed problem in consultation with TfN											
			Adaptive management used to update procedures in response to new or changing conditions											
			Targets to be maintained from Year 1 onwards: <ul style="list-style-type: none"> Inter-tussock space is maintained at 20 to 40% Organic litter is maintained at 10 to 30% 											
			Weed cover targets as above to be achieve at end of Year 10											
12	Ecological burning trial for Offset area**													
	Sep-Oct or March - May (or as specified in the burn plan)	Landholder to develop trial burn plan in consultation with TfN and where necessary, CFA or ecological consultant	Determine appropriate location for ecological burning trial in consultation with TfN / ecologist and record in annual works plan											
		Landholder to ensure all ecological burns are in accordance with the OMP	Undertake burning trial of up to 2 hectares, followed by 6 to 12 months grazing exclusion and follow up weed control											
		Landholder responsible for determining feasibility of larger burn in consultation with TfN based on results of trial	Data collected to determine that weed cover does not increase in burnt areas compared to unburnt areas											
			Review results of burning trial against management targets for ecological burn below and discuss feasibility with TfN and ecologist											
			Feasibility is determined for follow up weed control and grazing exclusion requirements prior to undertaking further ecological burning											
14	Ecological monitoring													
	Vegetation condition: Oct-early Dec GSM: flight season Nov-early Jan	Landholder to facilitate access to offset area for ecologists undertaking monitoring	Ecologist to establish monitoring plots and undertake baseline surveys in Year 0											
		Landholder to ensure any permanent markers of monitoring plots are not accidentally removed	Ecologist to undertake annual vegetation surveys in mid-late spring, data collected consistently to determine improvement in GSM habitat, identify problems early, identify opportunities for adaptive management											
		SPG to engage and fund ecological monitoring in accordance with the schedule in the OMP	Ecologist to review results of planned burns and provide advice on burn planning (as needed). Data collected to determine weed cover does not increase in burnt areas compared to unburnt areas											
			Ecologist to undertake GSM surveys during flight season at end of Years 1, 3, 5, 7, 9. Data collected consistently to determine improvement in GSM breeding population		(summer 2021/22)		(summer 2023/24)		(summer 2025/26)		(summer 2027/28)		(summer 2029/30)	
15	Trust for Nature routine inspections													
	Years 1, 3, 7 and 10 with at least one visit in spring	TfN will visit the Offset area a minimum of four times over the 10 year management period	Provide advice to landholder, ensure covenant is compliant											

Mana	Timing of activity	Roles and responsibility	Management results to be achieved	Yr: 0	1	2	3	4	5	6	7	8	9	10
				2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
16	Reporting													
	Ecological monitoring report - 15th January	Ecologist to prepare report and supply to Landholder and SPG prior to start of grazing period each year	Ecologist to prepare report on ecological monitoring and planned burn advice as detailed above.											
	Landholder annual report - anniversary of OMP	Landholder to supply annual report to SPG and TfN	Landholder to prepare annual report on based on records of works undertaken and routine inspections.											
		SPG to supply all reports to DAWE in fulfilment of approval conditions	Report must demonstrate progress of offset area has been tracked regularly each year over the 10 year management period											
17	Emergency management													
	Immediately as needed	Landholder to report any incidents that could threaten GSM to TfN with 24 hours	Identify and respond to emergency events according to Glenaroua emergency management plan											
		Landholder to report any incidents that could threaten GSM to SPG and DAWE within 5 days	Report any incidents that could threaten GSM to TfN with 24 hours (03) 8631 5888											
			Report any incidents that could threaten GSM to SPG and DAWE within 5 days post.approvals@environment.gov.au											
18	Years 11+: Maintain an annual works plan as above for the ongoing maintenance of the condition													Start in Year 11
	Year 11 onwards	Landholder to maintain condition achieved at the end of Year 10	Develop annual works plan to ensure management actions continue to adapt to current conditions for weeds, pest animals and biomass control.											
		Landholder to consult with TfN periodically to discuss effectiveness of on-going management	• Maintain fencing and signage.											
			• Continued protection of herb diversity and native tussock grass structure.											
			• Woody weeds maintained at <1% cover with no adult plants											
			• Cover of herbaceous weeds does not increase beyond levels achieved at Year 10											
			• Pest animals do not increase beyond levels achieved at Year 10											
			• Biomass is maintained to achieve >20 to 40% inter-tussock space											
			Seek advice from TfN, CMA, ecologist or other contractor, if necessary											
19	Revise OMP in response to either ineffective management actions, or improvements identified through on-ground evidence/external research and development, or in response to an incident or emergency.													
	As needed	Landholder to Identify any incidents or ineffective management actions and revise OMP where these can't be addressed within adaptive management provisions	Revise OMP to address changed circumstances (e.g. wildfire), ineffective management actions or new research											
		SPG to respond to any plan review request from DAWE	Apply to DAWE post-approvals to update OMP											
			Ensure OMP remains affective over time											

Appendix 2 DAWE Risk matrix

A4.1 Risk Framework

		Consequence				
		Minor	Moderate	High	Major	Critical
Likelihood	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

A4.2 Likelihood

Qualitative measure of likelihood (how likely is it that this event/circumstances will occur after **management actions** have been put in place/are being implemented)

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
Rare	May occur in exceptional circumstances

A4.3 Consequence

Qualitative measure of consequences (what will be the consequence / result if the issue does occur)

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 effort
Major	Major loss of environmental amenity and real danger of continuing
Critical	Severe widespread loss of environmental amenity and irrecoverable environmental damage

Appendix 3 Flora species recorded in 2019

Notes to tables:

EPBC Act: CR - Critically Endangered EN - Endangered VU - Vulnerable PMST – Protected Matters Search Tool	DEPI 2014a: e - endangered v - vulnerable r - rare k - poorly known
FFG Act: L - listed as threatened under FFG Act P - protected under the FFG Act (public land only)	Noxious weed status: SP - State prohibited species RP - Regionally prohibited species RC - Regionally controlled species R - Restricted species # - Native species outside natural range

A3.1 Flora species (80 native, 49 weeds) recorded from the Offset area

Note that this list is for information purposes only, it is not an exhaustive list of all species that currently occur within the Offset area or may occur in the future. Weed monitoring should include the possibility of new species entering the Offset area that are not listed in the table below.

Table A3.1 Flora species recorded from the study area

Status	Scientific Name	Common Name
Indigenous species (80 spp.)		
P	<i>Acacia aculeatissima</i>	Thin-leaf Wattle
	<i>Acacia implexa</i>	Lightwood
P	<i>Acacia mearnsii</i>	Black Wattle
	<i>Acacia melanoxylon</i>	Blackwood
	<i>Acacia paradoxa</i>	Hedge Wattle
P	<i>Acacia pycnantha</i>	Golden Wattle
	<i>Acaena echinata</i>	Sheep's Burr
L, P, e	<i>Amphibromus pithogastrus</i>	Plump Swamp Wallaby-grass
	<i>Amyema pendula</i>	Drooping Mistletoe
	<i>Anthosachne scabra</i> s.s.	Common Wheat-grass
	<i>Aphanes</i> spp.	Piert
	<i>Aristida behriana</i>	Brush Wire-grass
	<i>Arthropodium strictum</i> s.s.	Chocolate Lily
	<i>Asperula conferta</i>	Common Woodruff
	<i>Austrostipa mollis</i>	Supple Spear-grass
	<i>Austrostipa nodosa</i>	Knotty Spear-grass
	<i>Austrostipa scabra</i> subsp. <i>falcata</i>	Rough Spear-grass

Status	Scientific Name	Common Name
	<i>Austrostipa</i> spp.	Spear Grass
	<i>Burchardia umbellata</i>	Milkmaids
r	<i>Callitriche umbonata</i>	Winged Water-starwort
	<i>Carex inversa</i>	Knob Sedge
P	<i>Cheilanthes austrotenuifolia</i>	Green Rock-fern
	<i>Convolvulus</i> spp.	Bindweed
	<i>Crassula decumbens</i> var. <i>decumbens</i>	Spreading Crassula
	<i>Crassula peduncularis</i>	Purple Crassula
	<i>Crassula sieberiana</i> s.s.	Sieber Crassula
	<i>Dichondra repens</i>	Kidney-weed
	<i>Drosera hookeri</i>	Branched Sundew
	<i>Drosera peltata</i>	Pale Sundew
	<i>Drosera auriculata</i>	Sundew
	<i>Eleocharis acuta</i>	Common Spike-sedge
	<i>Epilobium billardierianum</i>	Variable Willow-herb
	<i>Eucalyptus camaldulensis</i>	River Red-gum
	<i>Eucalyptus goniocalyx</i> s.s.	Bundy
	<i>Eucalyptus macrorhyncha</i>	Red Stringybark
	<i>Eucalyptus melliodora</i>	Yellow Box
	<i>Eucalyptus microcarpa</i>	Grey Box
	<i>Eucalyptus polyanthemos</i>	Red Box
P	<i>Euchiton involucratus</i> s.s.	Star Cudweed
P	<i>Euchiton japonicus</i> s.s.	Creeping Cudweed
	<i>Geranium retrorsum</i> s.s.	Grassland Crane's-bill
	<i>Geranium</i> sp. 2	Variable Crane's-bill
	<i>Gonocarpus tetragynus</i>	Common Raspwort
	<i>Hibbertia obtusifolia</i>	Grey Guinea-flower
P	<i>Hyalosperma demissum</i>	Moss Sunray
	<i>Hydrocotyle laxiflora</i>	Stinking Pennywort
	<i>Hypericum gramineum</i> spp. agg.	Small St John's Wort
	<i>Juncus amabilis</i>	Hollow Rush
	<i>Juncus bufonius</i>	Toad Rush
	<i>Juncus homalocaulis</i>	Wiry Rush
	<i>Juncus subsecundus</i>	Finger Rush
	<i>Lobelia pedunculata</i> s.s.	Matted Pratia
	<i>Lomandra filiformis</i>	Wattle Mat-rush
	<i>Lomandra nana</i>	Dwarf Mat-rush
	<i>Luzula meridionalis</i> var. <i>densiflora</i>	Common Woodrush
	<i>Microlaena stipoides</i> var. <i>stipoides</i>	Weeping Grass
P	<i>Microtis unifolia</i>	Common Onion-orchid
	<i>Montia australasica</i>	White Purslane

Status	Scientific Name	Common Name
	<i>Myriophyllum crispatum</i>	Upright Water-milfoil
	<i>Oxalis perennans</i>	Grassland Wood-sorrel
	<i>Pauridia glabella</i> var. <i>glabella</i>	Tiny Star
	<i>Pelargonium</i> spp.	Stork's Bill
	<i>Pentapogon quadrifidus</i> var. <i>quadrifidus</i>	Five-awned Spear-grass
P	<i>Pleurosorus rutifolius</i> s.s.	Blanket Fern
	<i>Poa labillardierei</i>	Common Tussock-grass
	<i>Poa morrisii</i>	Soft Tussock-grass
	<i>Rumex brownii</i>	Slender Dock
	<i>Rytidosperma auriculatum</i>	Lobed Wallaby-grass
	<i>Rytidosperma caespitosum</i>	Common Wallaby-grass
	<i>Rytidosperma erianthum</i>	Hill Wallaby-grass
	<i>Rytidosperma setaceum</i> var. <i>setaceum</i>	Bristly Wallaby-grass
	<i>Schoenus apogon</i>	Common Bog-sedge
P	<i>Solenogyne dominii</i>	Smooth Solenogyne
	<i>Spergularia</i> spp.	Sand Spurrey
P, k	<i>Thelymitra exigua</i>	Short Sun-orchid
P	<i>Thelymitra peniculata</i>	Trim Sun-orchid
	<i>Themeda triandra</i>	Kangaroo Grass
	<i>Tricoryne elatior</i>	Yellow Rush-lily
	<i>Wahlenbergia multicaulis</i>	Branching Bluebell
	<i>Wahlenbergia</i> spp.	Bluebell
Introduced species (49 spp.)		
	<i>Acetosella vulgaris</i>	Sheep Sorrel
	<i>Agrostis capillaris</i>	Brown-top Bent
	<i>Aira caryophyllea</i> subsp. <i>caryophyllea</i>	Silvery Hair-grass
	<i>Aira cupaniana</i>	Quicksilver Grass
	<i>Anthoxanthum odoratum</i>	Sweet Vernal-grass
	<i>Arctotheca calendula</i>	Cape Weed
	<i>Avena barbata</i>	Bearded Oat
	<i>Briza maxima</i>	Greater Quacking-grass
	<i>Briza minor</i>	Lesser Quacking-grass
	<i>Bromus diandrus</i>	Great Brome
	<i>Bromus hordeaceus</i> subsp. <i>hordeaceus</i>	Soft Brome
	<i>Bromus rubens</i>	Red Brome
RC	<i>Carthamus lanatus</i>	Saffron Thistle
#	<i>Cassinia</i> spp. (?sifton)	Cassinia
	<i>Centaurium erythraea</i>	Common Centaury
	<i>Cerastium glomeratum</i> s.s.	Sticky Mouse-ear Chickweed
RR	<i>Cirsium vulgare</i>	Spear Thistle
	<i>Crassula natans</i> var. <i>minus</i>	Water Crassula

Status	Scientific Name	Common Name
	<i>Cynodon dactylon</i> var. <i>dactylon</i>	Couch
	<i>Disa bracteata</i>	South African Orchid
	<i>Erodium botrys</i>	Big Heron's-bill
	<i>Erodium cicutarium</i>	Common Heron's-bill
	<i>Erodium moschatum</i>	Musky Heron's-bill
	<i>Galium murale</i>	Small Goosegrass
	<i>Holcus annuus</i>	Annual Fog
	<i>Holcus lanatus</i>	Yorkshire Fog
	<i>Hypochaeris glabra</i>	Smooth Cat's-ear
	<i>Hypochaeris radicata</i>	Flatweed
	<i>Isolepis hystrix</i>	Awned Club-sedge
	<i>Isolepis levynsiana</i>	Tiny Flat-sedge
RC	<i>Juncus acutus</i> subsp. <i>acutus</i>	Spiny Rush
	<i>Leontodon taraxacoides</i> subsp. <i>taraxacoides</i>	Hairy Hawkbit
	<i>Lolium rigidum</i>	Wimmera Rye-grass
	<i>Lysimachia arvensis</i>	Pimpernel
RC	<i>Marrubium vulgare</i>	Horehound
	<i>Parentucellia latifolia</i>	Red Bartsia
	<i>Petrorhagia nanteuillii</i>	Childling Pink
	<i>Phalaris aquatica</i>	Toowoomba Canary-grass
	<i>Poa annua</i>	Annual Meadow-grass
	<i>Romulea rosea</i>	Onion Grass
RC	<i>Rosa rubiginosa</i>	Sweet Briar
	<i>Sonchus oleraceus</i>	Common Sow-thistle
	<i>Spergularia villosa</i>	Hairy Sand-spurrey
	<i>Stellaria media</i>	Chickweed
	<i>Trifolium dubium</i>	Suckling Clover
	<i>Trifolium subterraneum</i>	Subterranean Clover
RC	<i>Ulex europaeus</i>	Gorse
	<i>Urtica urens</i>	Small Nettle
	<i>Vulpia bromoides</i>	Squirrel-tail Fescue

Appendix 4 Quality scoring methods

VEGETATION

Quality improvement will be measured using the Habitat Hectares method at each of the permanent monitoring plots and as an average quality for the whole area. A Habitat Hectare score is easily converted to a score out of 10 as shown in the Table below. The vegetation quality scoring method was used to obtain the quality score of the offset area in the Offsets Assessment Guide and should be replicated to determine the final quality score. Where the score is a decimal, it is rounded to the nearest whole number for entry into the Offsets Assessment Guide. Scores with a decimal place value of less than 0.5 are rounded down, scores with a decimal place value of 0.5 or above are rounded up.

Table A5.1 Habitat Hectares score conversion to Quality score out of 10

Parameter	Components measured	Max. Habitat Hectares score	Equivalent Quality score
Site context	Number of species, cover and diversity of lifeforms Percentage of weed cover moderated by percentage of high threat weed cover Percentage of recruitment area scaled by herb diversity Percentage cover of organic litter scaled to litter type (native/non-native)	75/100	7.5/10
Site condition & stocking rate equivalent	Size of patch Neighbourhood measured as percentage of surrounding area Distance to large areas of native vegetation (>50 ha)	25/100	2.5/10
Total score		100/100	10/10

GSM habitat

Quality improvement will be measured using the vegetation results for site score described above and the results of targeted surveys for GSM.

The scoring methods used to obtain the Quality score of the Offset area in the Offsets Assessment Guide is shown in Table A5.2 and should be replicated to determine the final Quality score.

Table A5.2 GSM habitat Quality scoring system as advised by DAWE (pers. comm. 2019)

Parameter	Scoring system
Site context (max. 3 points)	<ul style="list-style-type: none"> 0/3 = Habitat patch¹ size <0.25 ha.² 1/3 = Habitat patch size more than 0.25 ha and up to 10 ha.² 2/3 = Habitat patch size more than 10 ha, shaped appropriately³ to reduce edge effects.² 3/3 = Habitat patch size more than 10 ha, shaped appropriately to reduce edge effects, slightly sloped (3° or less) and north-facing, minimal shading.
Site condition (max. 3 points)	<ul style="list-style-type: none"> 0/3 = dominated by introduced vegetation that is not a known food source. 1/3 = dominated by poor condition native vegetation (VQA site condition score up to 30/75) including <20% cover known food source, or dominated by introduced vegetation that is a known food source (i.e. Chilean needle grass) where the species stocking rate⁴ is less than 20 moths per hectare. 2/3 = dominated by moderate condition native vegetation (VQA site condition score 31-45/75) including between 20% and 40% cover known food source with limited inter-tussock space (<5%), or dominated by introduced vegetation that is a known food source (i.e. Chilean needle grass) where the species stocking rate⁴ is greater than 20 moths per hectare. 3/3 = dominated by high conservation value native vegetation (VQA site condition score 46+/75) including >40% cover known food source and appropriate inter-tussock space.
Species stocking rate^{4,5} (max. 4 points)	<ul style="list-style-type: none"> 0/4 = species not present 1/4 = 0-5 males per hectare 2/4 = >5-20 males per hectare 3/4 = >20-50 males per hectare 4/4 = >50 males per hectare
Total (out of 10)	

¹A patch is considered to be an area of GSM habitat separated from other areas of suitable habitat by >200m of unsuitable habitat, or barriers to flight (e.g. buildings, solid fences). A habitat patch should not be defined by administrative boundaries such as farm fencing, title or lot boundaries if habitat is continuous on either side of the boundary. According to the guidelines, if the amount of GSM habitat adjoining the site of the action cannot be determined, the area of habitat will be considered to be the same as that identified within the site.

²Add 1 point (up to a maximum of 3) where a patch is an occupied linkage between 2 populations.

³Assessed on a case by case basis.

⁴Stocking rate (measured as males per hectare) calculated as: total number of males recorded across four surveys in one flight season divided by area of habitat surveyed (with survey area confirmed with GPS tracks). It is not expected that results can be extrapolated across unsurveyed areas unless justification is given (e.g. the surveyed area is a sub-sample of the total area). Stocking rate calculations to be rounded up if required.

⁵It is expected that impact and offset sites to be surveyed on four occasions during the flying season and the survey results to be summed (consistent with survey guidelines). Justification will need to be provided to the Department to support proceeding in the absence of suitable survey effort.

For clarity, if lower survey effort than four complete surveys is accepted, the Department will consider:

- For impact sites: the highest recorded density is assumed to be the remaining score (e.g. if three surveys detect 5, 10, 15 males/ha, the assumed score for the last survey is 15 males/ha).
- For offset sites: the lowest record is assumed to be the remaining score (e.g. if three surveys detect 5, 10, 15 males/ha, the assumed score for the last survey is 5 males/ha).

For either type of site, if one survey records 5 males/ha, then assumed total of four surveys is 20 males/ha.

Appendix 5 Glossary of terms

Benchmark*

A standard vegetation –quality reference point, dependent on vegetation type, which is applied in Habitat hectare assessments. Represents the average characteristics of a mature and apparently long undisturbed state of the same vegetation type.

Biodiversity*

The variety of all life forms, the different plants, animals and microorganisms, the genes they contain, and the ecosystems of which they form a part.

Bioregion*

Biogeographic areas that capture the patterns of ecological characteristics in the landscape or seascape, providing a natural framework for recognising and responding to biodiversity values. A landscape based approach to classifying the land surface using a range of environmental attributes such as climate, geomorphology, lithology and vegetation.

BushBroker

A program coordinated by DELWP to match parties that require native vegetation offsets with third party suppliers of native vegetation offsets.

Ecological vegetation class (EVC)*

A native vegetation type classified on the basis of a combination of its floristic, life form, environmental and ecological characteristics.

EPBC Act

Environmental Protection and Biodiversity Conservation Act 1999

Gain

Predicted improvement in the contribution to Victoria's biodiversity achieved from an offset, calculated by combining site gain with the strategic biodiversity score or habitat importance score of the offset area. Gain is measured with biodiversity equivalence scores or units.

Habitat hectares*

Combined measure of condition and extent of native vegetation. This measure is obtained by multiplying the offset area's condition score (measured between 0 and 1) with the area of the offset (in hectares).

Habitat score*

The score assigned to a habitat zone that indicates the quality of the vegetation relative to the ecological vegetation class benchmark – sum of the site condition score and landscape context score, usually expressed as a percentage or on a scale of 0 to 1.

Habitat zone*

A discrete area of native vegetation consisting of a single vegetation type (EVC) within an assumed similar quality. This is the base spatial unit for conducting a Habitat hectare assessment. Separate *Vegetation Quality Assessments* (or Habitat hectare assessments) are conducted for each habitat zone within the designated assessment area.

Indigenous vegetation*

The type of native vegetation that would have normally been expected to occur on the offset area prior to European settlement.

Offset*

Protection and management (including revegetation) of native vegetation at a site to generate a gain in the contribution that native vegetation makes to Victoria's biodiversity. An offset is used to compensate for the loss to Victoria's biodiversity from the removal of native vegetation.

Offset Management Plan (OMP)

A document which sets out the requirements for establishment, protection and management of an offset area.

Site

An area of land that contains contiguous patches of native vegetation or scattered trees, within the same ownership.

Site gain

Predicted improvement in the condition, or the condition and extent, of native vegetation at a site (measured in Habitat hectares) generated by the landowner committing to active management and increased security.

Recruitment*

The production of new generations of plants, either by allowing natural ecological processes to occur (regeneration etc.), by facilitating such processes such as regeneration to occur, or by actively revegetating (replanting, reseeding). See Revegetation.

Remnant vegetation*

Native vegetation that is established or has regenerated on a largely natural landform. The species present are those normally expected in that vegetation community. Largely natural landforms may have been subject to some past surface disturbance such as some clearing or cultivation (or even the activities of the nineteenth century gold rushes) but do not include man-made structures such as dam walls and quarry floors.

Understorey*

Understorey is all vegetation other than mature canopy trees – includes immature trees, shrubs, grasses, herbs, mosses, lichens and soil crust. It does not include dead plant material that is not attached to a living plant. More information on understorey life forms is set out in the Vegetation Quality Assessment Manual (DSE 2004).