

Technical memorandum

To: Aoife Breathnach, Aurecon Australasia Pty Ltd
From: Natasha Rogers, Botanist
Date: 30 September 2025
Subject: Targeted flora and vegetation survey of the Transmission and Wind Farm survey areas for the Marri Wind Farm Project

Background

Marri WF Pty Ltd as trustee for the Marri WF Unit Trust (the Proponent), a wholly owned subsidiary of Alinta Energy Pty Ltd (Alinta Energy), is seeking approval to develop Marri Wind Farm (the Proposal) located approximately 20 kilometres (km) south of the township of Dandaragan within the Shire of Dandaragan (Figure 1). The proposed Project involves the construction of a up to 550 MW wind farm in Dandaragan. The combined survey area is located in the Shire of Dandaragan and the South West botanical province as defined in EPA (2016).

In June 2024 Phoenix Environmental Sciences Pty Ltd (Phoenix) was commissioned by Aurecon Group (Aurecon), on behalf of the Proponent, to undertake a fatal flaws desktop assessment and reconnaissance survey for the Project within the Wind Farm survey area (Phoenix 2025a). The desktop assessment identified 81 significant flora within the desktop extent, including 4 species (*Hypocalymma serrulatum* P2, *Banksia kippistiana* var. *paenepeccata* P3, *Styphelia allittii* P3 and *Anigozanthos humilis* subsp. *chrysanthus* P4) inside the survey area and the presence of *Banksia* Woodlands of the Swan Coastal Plain Threatened Ecological Community (TEC). The reconnaissance survey confirmed the presence of *Banksia* Woodlands of the Swan Coastal Plain TEC within the Wind Farm survey area and the presence of a significant flora (*Stylidium aceratum* P3).

Subsequently, Phoenix was commissioned in February 2025 to undertake a targeted flora and vegetation survey in the Wind Farm survey area for the Project (Phoenix 2025b). The targeted survey found instances of *Banksia* Woodlands of the Swan Coastal Plain TEC, confirmed presence of a significant flora (*Banksia dallanneyi* subsp. *pollostata* P3), and potentially significant flora (*Synaphea* sp., *Anigozanthos humilis* (sens. lat.) and *Banksia dallanneyi* (sens. lat.)).

For the current July 2025 survey, the Proponent provided an additional Transmission survey area, adjacent to the Wind Farm survey area, also requiring targeted flora and vegetation searches (Figure 1). Both the Wind Farm and Transmission survey areas combined are referred to as the combined survey area.

A review of desktop assessment indicates that 8 Priority flora (*Hypocalymma lateriticola* P1, *Lepyrodia curvescens* P2, *Babingtonia urbana* P3, *Dampiera tephrea* P3, *Haemodorum loratum* P3, *Persoonia rudis* P3, *Eucalyptus macrocarpa* subsp. *elachantha* P4 and *Rumex drummondii* P4) and records of the *Banksia* Woodlands of the Swan Coastal Plain TEC are recorded within the Transmission survey area.

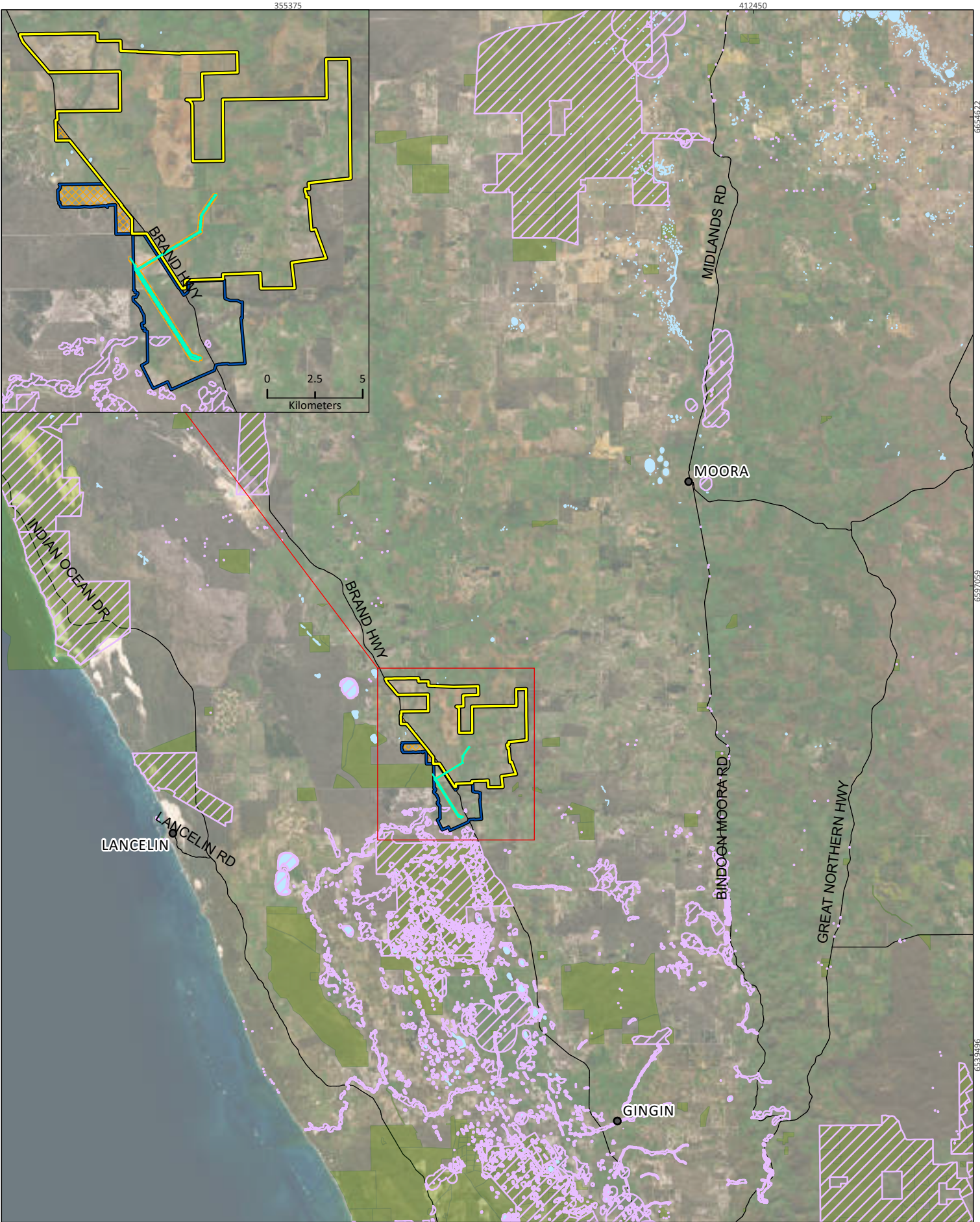
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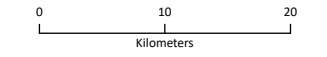
Scope

The scope of the conducted targeted flora and vegetation survey of the Transmission and Wind Farm survey areas for the Marri Wind Farm Project was to:

- Undertake a targeted survey of native vegetation accessible within the Transmission survey area and infill areas of the Wind Farm survey area to record the presence of:
 - significant flora.
 - the *Banksia* Woodlands of the Swan Coastal Plain TEC.
 - locally significant vegetation (habitat for significant flora, highly diverse vegetation in Very Good to Excellent condition).
- Provide maps and spatial data of the presence of significant flora, TEC, and locally significant vegetation identified as no-go areas.
- Provide a brief technical memorandum outlining the methods and the results of the survey.

However, due to time constraints, Aurecon on behalf of the Proponent outlined key priority areas following the initial scope, with the highest priority placed on remnant vegetation within these areas (Figure 1). Additionally, due to access issues encountered within the Transmission survey area, additional supplementary/infill targeted searches within the Wind Farm survey area were requested by the Proponent following initial scope to ensure adequate data was collected.



Alinta Energy Marri Wind Farm Project	
Project No	1738
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Map author	NR
	
	
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


-  Wind Farm survey area
-  Transmission survey area
-  Lakes
-  DBCA managed land
-  Environmentally sensitive areas
-  Key priority areas
-  Roads
-  Transmission corridor

Figure 1

Project location and survey areas


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Methods

Desktop assessment

Results from the previous Phoenix (2025a) desktop assessment were used to inform the current survey (July 2025) of the regional and local contextual information.

Field survey

The field survey current survey (July 2025) was undertaken by a field team comprising of a Senior Botanist and Botanist. Table 1 outlines the surveys undertaken by Phoenix for the Project, including the survey seasons as defined by the technical guidance (EPA 2016).

Table 1 Phoenix surveys for the Marri Wind Farm Project

Phoenix report	Survey type	Dates	Survey season
Phoenix (2025a)	Desktop assessment and Reconnaissance survey	18-19 September 2024	Primary survey season
Phoenix (2025b)	Targeted flora and vegetation survey	21-26 February 2025	Out of season
Phoenix (2025c)	Targeted flora and vegetation survey	9-11 July 2025	Supplementary survey season

Targeted searches were undertaken on foot in meandering transects spaced a suitable distance apart for the particular vegetation type encountered, 10 to 25 metres (m) apart, dependent on vegetation density (Figure 2). Where plants considered representative of significant flora are encountered the following information was collected:

- GPS coordinates, including population boundary, where possible
- description of the habitat and floristic community of the population
- population size estimate, i.e. estimated number of individual plants
- specimen collection for taxonomic identification and lodgement at the Western Australian (WA) Herbarium
- photograph of live plants in-situ and description of important details, such as flower colour, height of individual, or average height of population.

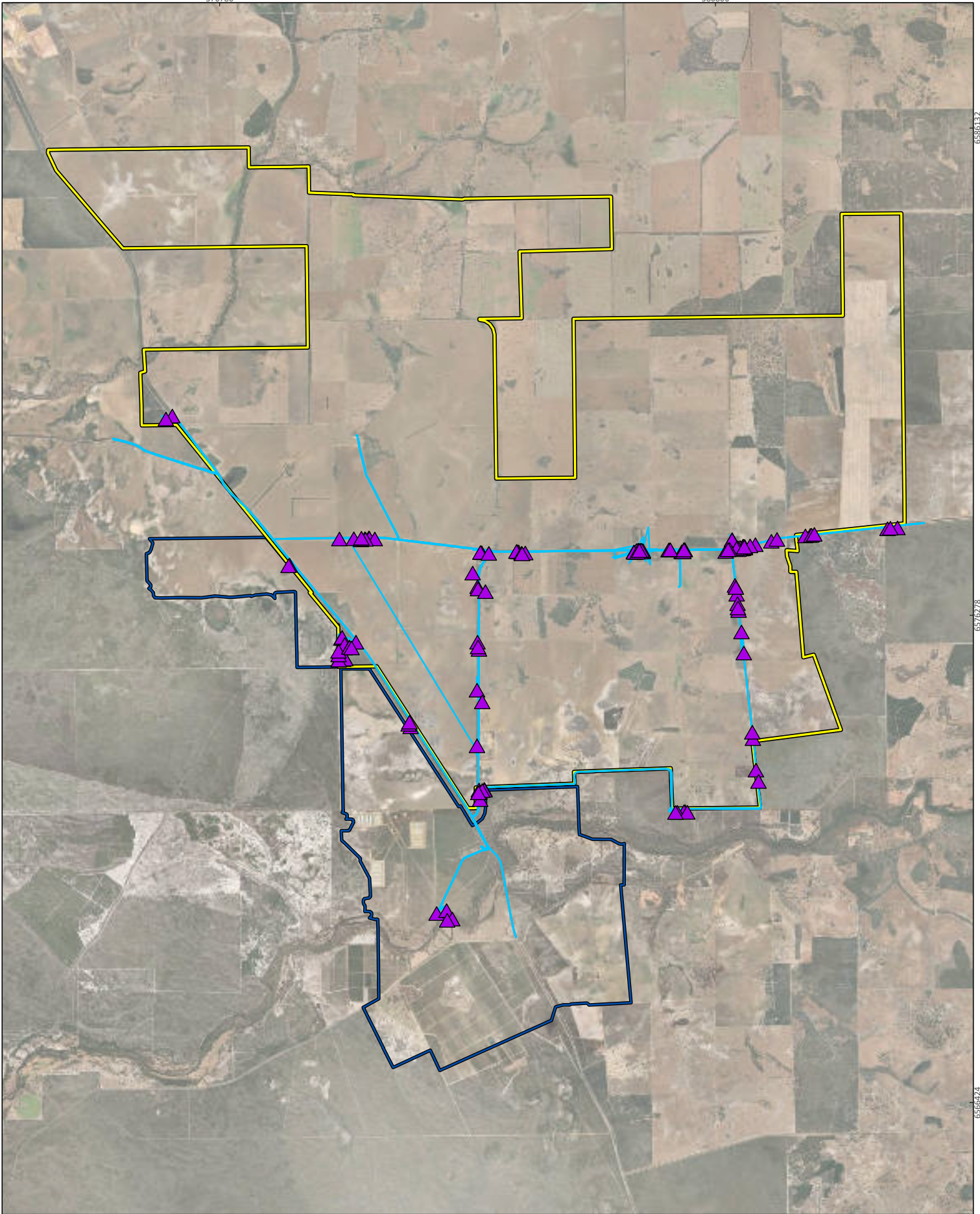
Where vegetation is encountered that is considered representative of the *Banksia* Woodlands of the Swan Coastal Plain TEC a survey was conducted in accordance with the guidance for determining whether the TEC is present provided in TSSC (2016).


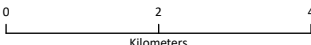
Where areas of remnant vegetation are considered to be in Very Good to Excellent condition utilising the scale for the South West botanical province provided in EPA (2016) and exhibit a high plant diversity, site descriptions were utilised to provide sufficient data of the vegetation composition to support determination of the area as locally significant. The following data was recorded:

- location – a geographic coordinate
- description of vegetation – a broad description utilising the structural formation and height classes based on National Vegetation Information System (ESCAVI 2003) and in accordance with (EPA 2016)
- habitat – a brief description of landform and habitat
- disturbance history – a description of any observed disturbance including an estimate of time since last fire, weed invasions, soil disturbance, human activity and fauna activity
- vegetation condition – using the condition scale in EPA (2016) for the South West Botanical Province
- photograph – a colour photograph of the vegetation within each quadrat in a south-easterly direction from the north-west corner of the quadrat.

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To ensure accurate taxonomic identification of flora species present within the combined survey area, collections were obtained of recorded and suspected significant flora species at least once and each collection pressed and documented for identification using the WA Herbarium resources. All plant specimens collected during the field surveys were identified using appropriate reference material or through comparisons with pressed specimens housed at the WA Herbarium, where necessary. Nomenclature of the species recorded is in accordance with Department of Biodiversity, Conservation and Attractions (DBCA) WA Flora Census Names Database (DBCA 2025).



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-  Wind Farm survey area
-  Transmission survey area
-  Tracks
-  Data collection points

Figure 2
Data collection points and survey effort



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Results

Flora


The previous Phoenix (2025a, 2025b) surveys (respectively recorded 2 Priority species *Banksia dallanneyi* subsp. *pollostata*, *Stylidium aceratum*, and 3 potential Priority species *Synaphea* sp., *Anigozanthos humilis* (sens. lat.) and *Banksia dallanneyi* (sens. lat.)) (Figure 3). The current targeted survey (July 2025) identified 3 Priority flora, *Banksia dallanneyi* subsp. *pollostata* (P3), *Platysace ramosissima* (P3) and *Verticordia lindleyi* subsp. *lindleyi* (P4) (Table 2; Figure 3).

Banksia dallanneyi subsp. *pollostata* (P3) were widespread within the Wind Farm survey area, however, were not observed within the Transmission survey area.


Both the *Platysace ramosissima* (P3) and *Verticordia lindleyi* subsp. *lindleyi* (P4) were observed in the same location.

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Table 2 **Details significant species recorded during the field survey**

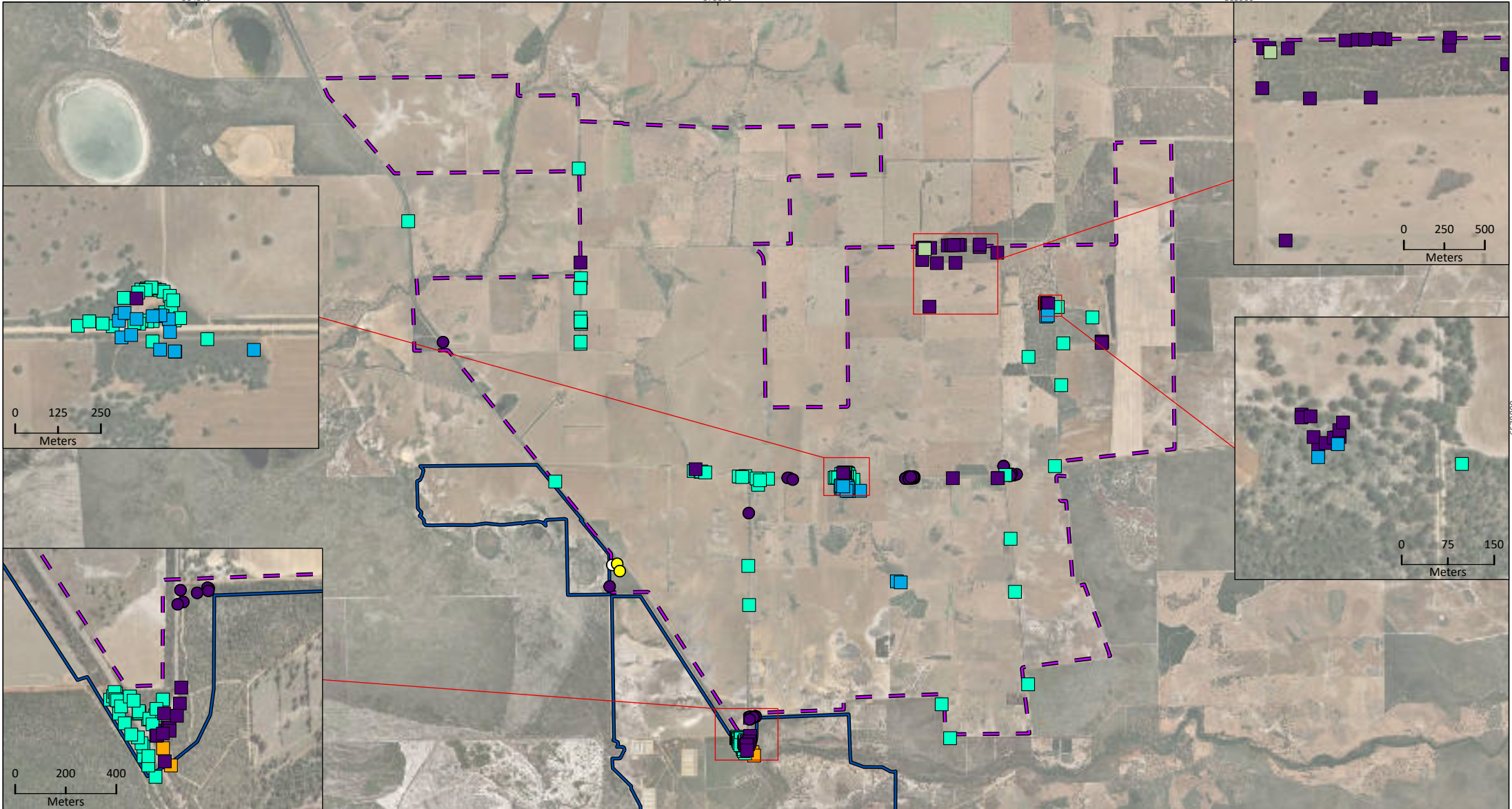
Species	Status	Distribution and ecology	Survey records	Photograph
<i>Banksia dallanneyi</i> subsp. <i>pollostata</i>	P3 (DBC list)	Occurs in the Avon Wheatbelt, Geraldton Sandplains, Jarrah Forest and Swan Coastal Plain bioregions (WA Herbarium 1998–). Habitat descriptions include <i>Banksia</i> and Eucalypt woodlands over mid-low heath, on pale sandy soils. Population sizes range from one to 1,000+ and observations as infrequent to common. (WA Herbarium 1998–).	<p>A total of 648 plants recorded during the current survey. Subsequently, a grand total of 2,722 plants within 16 populations were recorded, inclusive of Phoenix (2025b) results.</p> <p>A total of 2,619 plants (96.2%) of the grand total plants occur within the mapped boundaries of locally and regionally significant vegetation.</p> <p>Recorded within remanent vegetation on road verges, growing amongst <i>Banksia</i>, and <i>Corymbia calophylla</i> woodlands to low kwongan heathlands. Was observed to grow in habitats with deep leaf litter.</p>	 <p style="text-align: center;">Current survey</p>


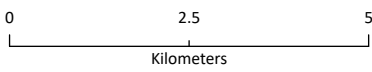
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Species	Status	Distribution and ecology	Survey records	Photograph
<p><i>Platysace ramosissima</i></p>	<p>P3 (DBCA list)</p>	<p>Occurs in the Geraldton Sandplains, Jarrah Forest, Swan Coastal Plain, Warren bioregions (WA Herbarium 1998–). Habitat descriptions include <i>Banksia</i> and Eucalypt woodlands over myrtaceous heath species, on white-yellow sand. Population sizes are typically described as uncommon to scattered (WA Herbarium 1998–).</p>	<p>A total of 50 plants within one new population were recorded during the current survey within the Wind Farm survey area.</p> <p>The population occurs within the mapped boundaries of high value vegetation (locally significant).</p> <p>Recorded growing in low heath dominated by myrtaceous and proteaceous species, on white sandy soils.</p>	 <p>Current survey</p>

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Species	Status	Distribution and ecology	Survey records	Photograph
<i>Verticordia lindleyi</i> subsp. <i>lindleyi</i>	P4 (DBC list)	<p>Occurs in the Geraldton Sandplains, Jarrah Forest and Swan Coastal Plain bioregions (WA Herbarium 1998–). Habitat descriptions include low myrtaceous and proteaceous dominated heath on pale sandy soils. Population sizes are typically described as uncommon to common (WA Herbarium 1998–).</p>	<p>A total of 81 plants within one new population were recorded during the current survey within the Wind Farm survey area.</p> <p>The population occurs within the mapped boundaries of high value vegetation (locally significant).</p> <p>Recorded growing in low heath dominated by myrtaceous and proteaceous species, on white sandy soils.</p>	 <p style="text-align: center;">Current survey</p>



Alinta Energy		
Marri Wind Farm Project		
Project No	1738	
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- Combined survey area**
-  Transmission survey area
 -  Wind farm study area
- Current survey records**
-  *Banksia dallanneyi* subsp. *pollostae*, P3 (DBC list)
- Previous Phoenix survey records**
-  *Verticordia lindleyi* subsp. *lindleyi*, P4 (DBC list)
 -  *Anigozanthos humilis*, Potential Priority species
- Platysace**
-  *ramosissima*, P3 (DBC list)
- Banksia dallanneyi, Potential Priority species**
-  Potential Priority species
 -  *Banksia dallanneyi* subsp. *pollostae*, P3 (DBC list)
 -  *Stylidium aceratum*, P3 (DBC list)
 -  *Synaphea* sp., Potential Priority species

Figure 3
Significant flora recorded from the field surveys



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Vegetation

Vegetation assessed as either regionally or locally significant encompassed a total of 717.30 ha was mapped (comprising of 690.64 ha within the combined survey area and 26.66 ha mapped outside combined survey area) (Table 3; Figure 3).

A total of 427.42 ha of the regionally significant *Banksia* Woodlands of the Swan Coastal Plain TEC was mapped, comprising of 161.06 ha within the Wind Farm survey area, 240.92 ha within the Transmission survey area and 25.44 ha outside the combined survey areas. The majority of the TEC surveyed (352.89 ha) are existing records of the TEC that were visited and confirmed, followed by 62.88 ha represent new records of the TEC not identified in the desktop review, and first encountered by Phoenix during one of the surveys for the Project. The remaining 11.65 ha are pre-existing records of the TEC, assumed to be correct with level of high confidence, but were not visited by the surveys (Table 3). No new instances of TEC were recorded within the Transmission survey area.

The presence of other TEC or Priority Ecological Communities identified in the Phoenix (2025a) desktop review were discounted as occurring within in the Wind Farm survey area and the areas surveyed within the Transmission survey area due to incompatible species composition and/or landform.

Locally significant vegetation within the Wind Farm survey area encompasses 288.66 ha and consists of 2 types; i) vegetation of high value, and ii) vegetation analogous to *Banksia* Woodlands of the Swan Coastal Plain TEC. High value habitat (including suspected high value habitat) encompasses 282.53 ha and was classified as locally significant vegetation for its capacity for high flora species diversity and potential as habitat for significant flora. Though of insufficient size and/or condition to be regarded TEC, vegetation analogous to *Banksia* Woodlands of the Swan Coastal Plain TEC encompasses 6.13 ha within the Wind Farm survey area and is also considered locally significant (Table 3). An additional 1.22 ha of locally significant vegetation analogous to *Banksia* TEC is mapped outside the combined survey areas. No locally significant vegetation was mapped within the Transmission survey area.

An additional 5.68 ha encompassing 2 remnant patches within the Wind Farm survey area are currently recorded as the Endangered *Banksia* TEC within the DBCA (2024) database, were found not to represent the TEC. The instances were assessed and found to be a *Banksia hewardiana* shrubland and a *Corymbia calophylla* woodland rather than the *Banksia* TEC. These patches are not presented by this report as significant vegetation and correction of the DBCA database is recommended.

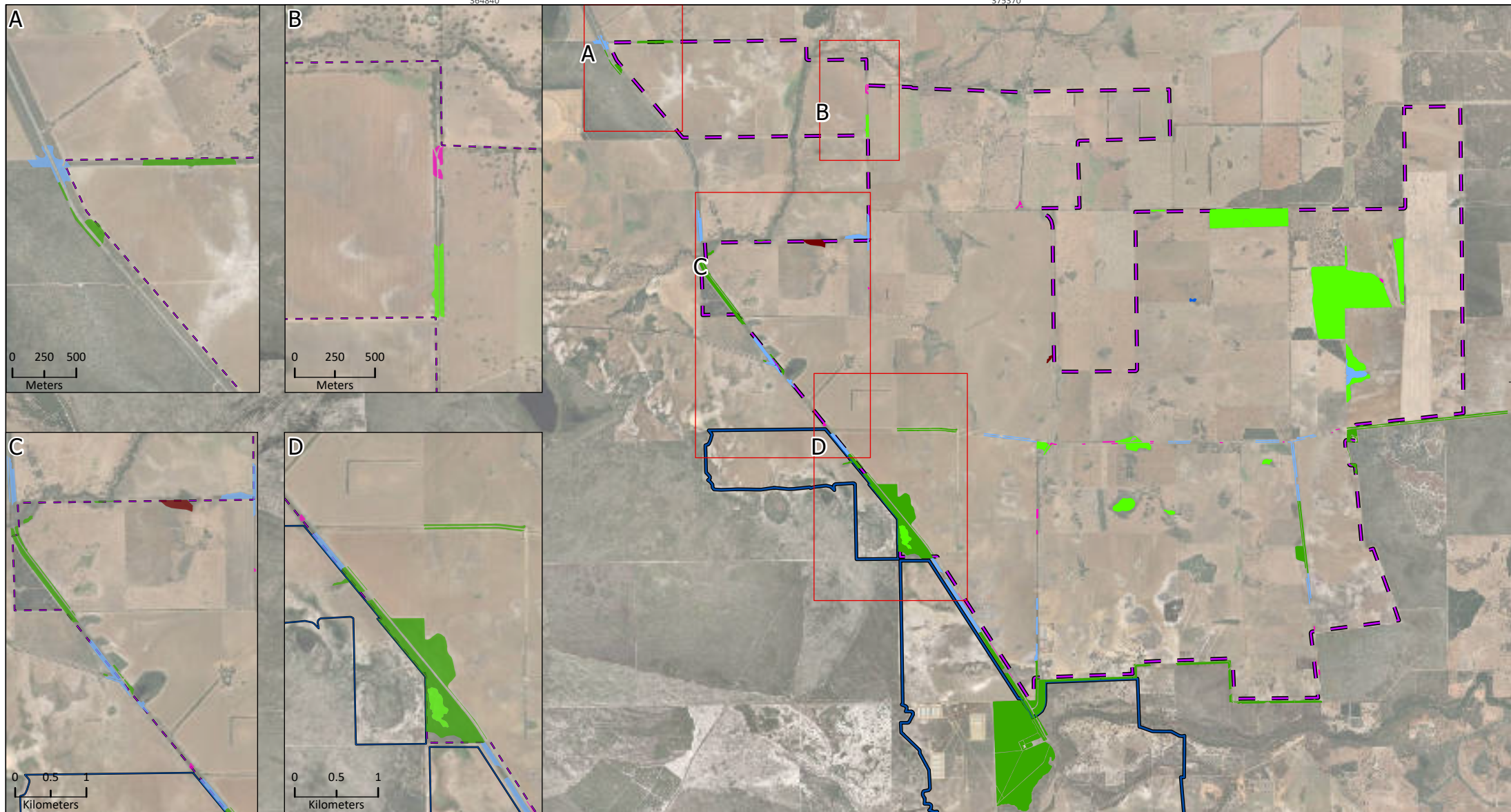
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Table 3 Distribution summary of mapped vegetation for the Project

Vegetation value	Level of significance	Significance	Area of mapped extent (ha)	% of mapped extent	Area within combined survey area (ha)	% mapped extent within combined survey area	Area mapped outside combined survey area	% mapped extent outside combined survey area	Area within Wind Farm survey area (ha)	% of Wind Farm survey area	Area within Transmission survey area (ha)	% of Transmission survey area
<i>Banksia</i> Woodlands of the Swan Coastal Plain TEC	Regionally significant	Represents confirmed existing TEC records.	352.89	48.81	344.88	47.70	8.01	1.11	109.88	0.88	235.00	7.19
		Represents newly recorded instances of TEC.	62.88	8.70	45.44	6.29	17.43	2.41	45.44	0.36	N/A	N/A
		Represents pre-existing TEC record assumed correct with high confidence (not visited by surveys).	11.65	1.61	11.65	1.61	N/A	N/A	5.74	0.05	5.91	0.18
Regionally significant vegetation totals			427.42	59.12	401.98	55.60	25.44	3.52	161.06	1.28	240.92	7.37
High value habitat	Locally significant	Represents vegetation of high value as significant flora habitat and/or areas of higher species richness/diversity.	281.77	38.97	281.77	38.97	N/A	N/A	281.77	2.24	N/A	N/A
Suspected high value habitat		Represents potential vegetation of high value as significant flora habitat and/or areas of higher species richness/diversity.	0.76	0.11	0.76	0.11	N/A	N/A	0.76	0.01	N/A	N/A

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Vegetation value	Level of significance	Significance	Area of mapped extent (ha)	% of mapped extent	Area within combined survey area (ha)	% mapped extent within combined survey area	Area mapped outside combined survey area	% mapped extent outside combined survey area	Area within Wind Farm survey area (ha)	% of Wind Farm survey area	Area within Transmission survey area (ha)	% of Transmission survey area
Analogous to TEC		Represents vegetation analogous to <i>Banksia</i> Woodlands of the Swan Coastal Plain TEC but not meeting condition and patch size thresholds.	7.34	1.02	6.13	0.85	1.22	0.17	6.13	0.05	N/A	N/A
Locally significant vegetation totals			289.88	40.10	288.66	39.93	1.22	0.17	288.66	2.30	N/A	N/A
Pre-existing DBCA TEC proved incorrect	Report– Not significant DBCA– Regionally significant	Represents a confirmed error in DBCA database as the pre-existing TEC record confirmed to not be TEC.	5.68	0.79	5.68	0.79	N/A	N/A	5.68	0.05	N/A	N/A
All mapped vegetation totals			722.98	100.00	696.32	96.31	26.66	3.69	455.40	3.63	240.92	7.37



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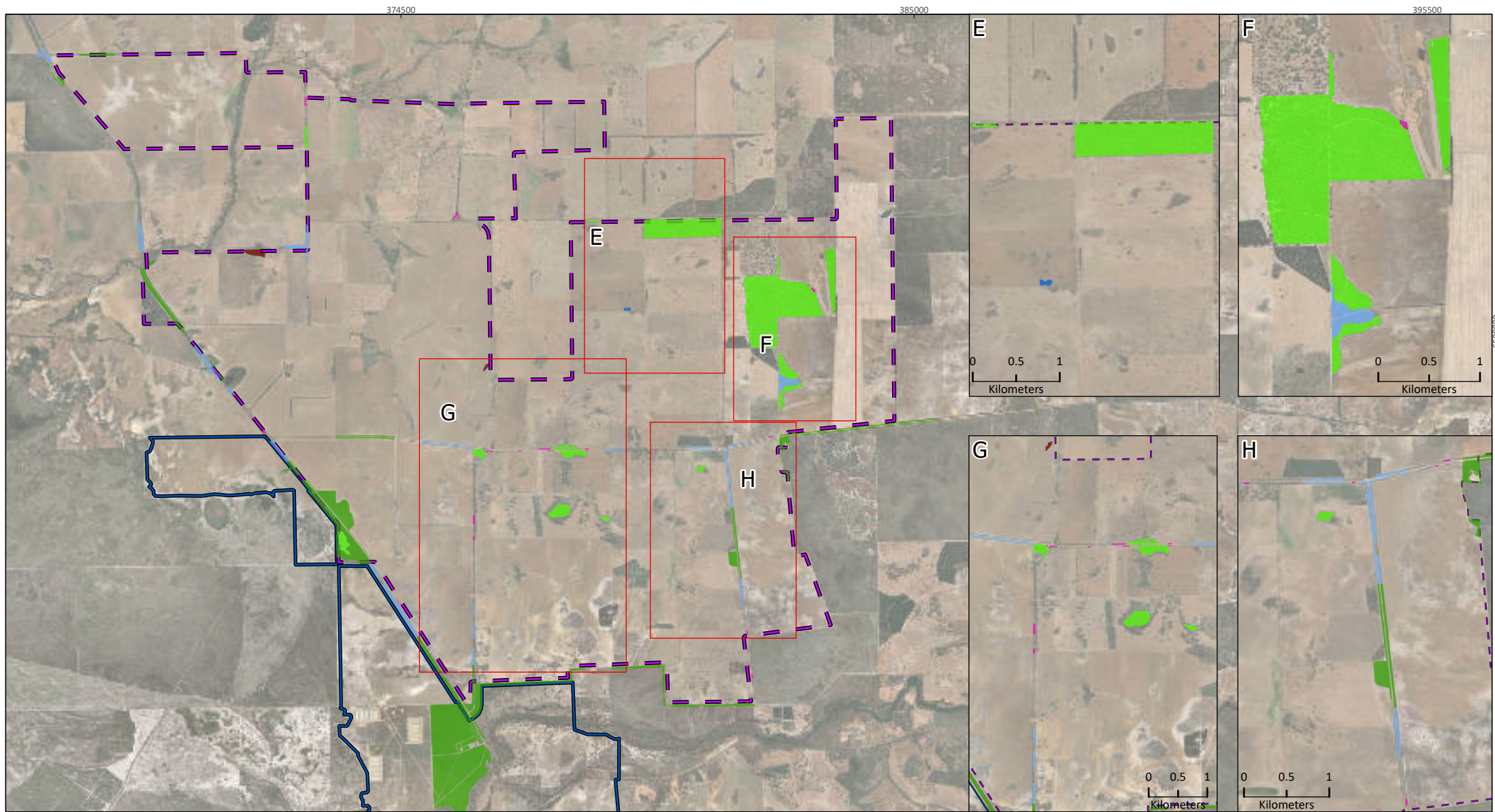
- Combined survey area**
- Transmission survey area
 - Wind Farm survey area
- Vegetation type**
- Analogous to Banksia Woodlands of the Swan Coastal Plain TEC
 - Confirmed error TEC record
 - New Banksia Woodlands of the Swan Coastal Plain TEC
 - Potential vegetation of high value
 - Preexisting Banksia Woodlands of the Swan Coastal Plain TEC
 - Vegetation of high value


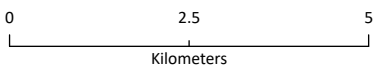
Figure 4a

Significant vegetation recorded from the field surveys

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Combined survey area	
	Transmission survey area
	Wind Farm survey area
Vegetation type	
	Analogous to Banksia Woodlands of the Swan Coastal Plain TEC
	Confirmed error TEC record
	New Banksia Woodlands of the Swan Coastal Plain TEC
	Potential vegetation of high value
	Preexisting Banksia Woodlands of the Swan Coastal Plain TEC
	Vegetation of high value

Figure 4b
Significant vegetation recorded from the field surveys



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Limitations

The limitations of the flora and vegetation survey have been considered in Table 4 in accordance with EPA (2016).

Table 4 Consideration of potential survey limitations

Limitations	Comments
Availability of contextual information at a regional and local scale	Not a limitation Desktop review in the Phoenix (2025a) report provided a sufficient amount of contextual data at regional and local scales.
Competency/experience of the team carrying out the survey	Not a limitation The survey team field lead has 22+ years' experience in the Swan Coastal Plain bioregion.
Scope and completeness	Not a limitation (Wind Farm survey area) The survey was in accordance with the scope provided by Aurecon. The scope of the survey was to undertake a targeted survey to identify the significant vegetation and flora within the survey area. Moderate limitation (Transmission survey area) The survey was in accordance with the scope provided by Aurecon. The scope of the survey was to undertake a targeted survey to identify the significant vegetation and flora within the survey area with preference. However, due to access restrictions within the majority of the Transmission survey area, much of the significant flora and vegetation values cannot be confirmed.
Proportion of flora recorded and/or collected, any identification issues	Not a limitation All specimens collected were able to be identified to species level.
Access within the survey areas	Not a limitation (Wind Farm survey area) Remnant vegetation within the Wind Farm survey area was able to be accessed by either driving on existing tracks or walking on foot. Moderate limitation (Transmission survey area) Much of remnant vegetation within the Transmission survey area was not able to be accessed during the survey, including a portion of the key priority areas (northern-most polygon of the Transmission survey area). All other portions of key priority areas with remnant vegetation were able to be searched.

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Limitations	Comments
Timing, rainfall, season	<p>Moderate limitation–(targeted searches for significant flora)</p> <p>The field survey was completed during the supplementary survey timing for the South West and Interzone Botanical Province (EPA 2016).</p> <p>The majority of significant species identified within the desktop review were not known to flower during this survey timing Phoenix (2025a). Additionally, annual species may not have been detectable/ present during the field survey.</p> <p>Not a limitation–(targeted searches for TEC and other significant vegetation)</p> <p>The out of season survey was not a limitation for TEC and other significant vegetation, as the key components of vegetation types are perennial species and can often be identified in their vegetative state.</p>
Disturbance that may have affected the results of the survey	<p>Not a limitation</p> <p>There were no signs of major disturbances within the combined survey area which would have impacted the results of the survey.</p>

Discussion

The current July 2025 targeted flora and vegetation survey in combination with the previous Phoenix (2025a, 2025b) surveys successfully identified environmental values within the combined survey area (Table 1). A total of 4 confirmed Priority species and 3 taxa presumed significant species were recorded within the Wind Farm survey area over the course of 3 field surveys (Table 1). Furthermore, both regionally significant vegetation (*Banksia* Woodlands of the Swan Coastal Plain TEC) and locally significant vegetation (as high value habitat, suspected high value habitat, and vegetation analogous to *Banksia* Woodlands of the Swan Coastal Plain TEC) were mapped within the combined survey area.

Flora

The previous Phoenix (2025a, 2025b) surveys identified the presence of 2 confirmed Priority 3 species (*Banksia dallanneyi* subsp. *pollostata* and *Stylidium aceratum*) along with the 3 presumed significant species (*Anigozanthos humilis* (sens. lat.), *Banksia dallanneyi* (sens. lat.) and *Synaphea* sp.).

Banksia dallanneyi subsp. *pollostata* was observed to be widespread and abundant within the Wind Farm survey area during the previous Phoenix (2025b) survey. The July 2025 current targeted survey expanded on the previous Phoenix records, with plant counts within the Wind Farm survey area increasing from 2,074 plants within 10 populations, to 2,722 plants within 16 populations. However, irrespective of its abundance within the Wind Farm survey area, it was not recorded within the Transmission survey area during the July 2025 survey. This is likely due to markedly less survey effort within the Transmission survey area comparative to the Wind Farm survey area, and not because it does not occur within the Transmission survey area.

The current July 2025 survey recorded an additional 2 new Priority species within the Wind Farm survey area, *Platysace ramosissima* (P3) and *Verticordia lindleyi* subsp. *lindleyi* (P4). Both species were recorded nearby each other, within low heathlands mapped as high value habitat. It is possible that there are additional undetected plants/ populations of these species within the combined survey area, as there is potential habitat that has not been searched, mainly within the Transmission survey area.

Notably, no significant flora was recorded within the Transmission survey area during the current July 2025 survey, likely due to the survey effort in areas considered suitable habitat were very cursory, and not because they didn't occur there. However, additional surveys with access to these areas would be required to confirm.

The Phoenix (2025b) report documented that following the February 2025 field survey that a change to the Phoenix (2025a) post-field survey likelihood of occurrence assessment was required (*Banksia dallanneyi* subsp. *pollostata* changed from likely to recorded). The findings of the July 2025 field survey incur a further 2 changes to the Phoenix (2025a) post-field survey likelihood of occurrence assessment, being *Platysace ramosissima* (P3) and *Verticordia lindleyi* subsp. *lindleyi* (P4) changed from possible to occur to recorded. However, with the inclusion of the Transmission survey area, there is an additional 8 changed. The desktop records of the 8 Priority flora (*Hypocalymma lateriticola* P1, *Lepyrodia curvescens* P2, *Babingtonia urbana* P3, *Dampiera tephrea* P3, *Haemodorum loratum* P3, *Persoonia rudis* P3, *Eucalyptus macrocarpa* subsp. *elachantha* P4 and *Rumex drummondii* P4) recorded within the Transmission survey area all changed to recorded. However, as not all the Transmission survey area was surveyed the presence of these have not been confirmed.

Vegetation

The current July 2025 survey refined the significant vegetation mapping of the Wind Farm survey area from the Phoenix (2025b) and found that a total of 690.64 ha (an additional 26.66 ha was mapped outside of the combined survey boundaries) of both regional and local significant vegetation was identified within the combined survey area during the field survey. Regionally significant vegetation is characterised as *Banksia* Woodlands of the Swan Coastal Plain TEC (EN EPBC Act; P3 DBCA list). Locally significant vegetation is characterised as high value habitat, suspected high value habitat, and vegetation analogous to *Banksia* Woodlands of the Swan Coastal Plain TEC.

The *Banksia* Woodlands TEC is conservation significant due to it severely reduced Statewide extent, and as it is also known habitat to a wide variety of conservation significant flora (TSSC 2016). The surveys found additions and corrections to pre-existing DBCA records of the *Banksia* TEC within the combined survey area.

Technical memorandum

A total of 5.68 ha of DBCA mapped TEC did not match the characteristics of TEC presented by TSSC (2016). Newly recorded instances of TEC encompassed a total 62.88 ha. These additions and corrections must be reported to the DBCA TEC database.

The significant vegetation mapping undertaken for the Transmission survey area was only mapped in areas visited during the July 2025 survey. The mapped significant vegetation within the Transmission survey area consisted only of confirmed existing TEC records and pre-existing TEC record assumed correct. However, it is highly likely that there is both additional regionally and locally significant vegetation within the Transmission survey area outside what has been currently mapped by Phoenix.

Dependent on the Project's final proposed construction footprint, a Native Vegetation Clearing Permits (NVCP) may be sought as part of the Project's development. Phoenix acknowledges the Project seeks to avoid or minimise impacts to remnant vegetation within the constraints of the Project's development requirements. As such, if NVCPs are sought Phoenix's recommends a tailored approach dependent upon environmental value of individual vegetation patches:

- Agricultural lands occupied by scattered remnant trees or small stands of trees were often devoid of remnant understorey. Such areas are deemed highly unlikely to be habitat for conservation significant flora species and do not warrant further survey (from a flora/vegetation perspective) if NVCPs are sought.
- Vegetation outside of the mapped remnant patches that still clearly have understorey have a low likelihood of containing significant flora species. Partial clearing of such remnant patches is therefore unlikely to have an adverse impact on significant flora species. However, NVCPs sought within such areas may or may not require further targeted survey depending on scale and proportion of clearing within a patch.
- Vegetation mapped as locally significant (either as high value or as analogous to TEC) are best avoided where possible due a higher likelihood of NVCP conditions of additional targeted flora survey. Though not gazetted as TEC or Priority Ecological Communities, these remnants represent likely habitat for significant flora that are surveyable within the seasons recommended by the Technical Guidance EPA (2016).
- Vegetation confirmed and mapped as regionally significant (TEC) are best avoided, likely requiring similar NVCP conditions as for identified locally significant vegetation. Successful application for NVCPs within TEC may also require assessment of proportional impacts upon the TEC in the local region.
- Any remnant vegetation within the Transmission survey area not visited by Phoenix should be avoided. However, if remnant vegetation cannot be avoided, additional surveys targeting pertinent vegetation may be required to obtain a NVCP.

Yours Sincerely,

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