

Alliance Business Park EPBC 2017/7930

Compliance Report

11 September 2024 – 11 September 2025

Final Report

Prepared for MAB Corporation Pty Ltd

3 December 2025

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- Mitch Deaves (quality assurance)

Biosis acknowledges the Aboriginal and Torres Strait Islander peoples as Traditional Custodians of the land on which we live and work.

We pay our respects to the Traditional Custodians and Elders past and present and honour their connection to Country and ongoing contribution to society.

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1 Introduction

1.1 Description of activities

Biosis Pty Ltd (Biosis) was commissioned by MAB Corporation Pty Ltd (MAB) to prepare an annual compliance report for the Alliance Business Park development at 165-195 O'Herns Road, Epping (EPBC 2017/7930).

EPBC 2017/7930 was granted on 25 September 2018 to Alliance Business Park Pty Ltd (a subsidiary of MAB) and remains in effect until August 2038. The approval is to *expand the Alliance Business Park to the east by establishing industrial, commercial and retail development at 165-195 O'Herns Road, Epping Victoria*. An earlier approval was granted in 2013 to MAB for the first portion of the Alliance Business Park development, located at 275 O'Herns Road, Epping (2012/6298). Together, the two approvals facilitated the construction of the Alliance Business Park.

A variation to conditions for EPBC approval 2017/7930 was approved on 23 May 2025.

Condition 17 of the original approval (EPBC 2017/7930) required the approval holder to prepare a compliance report for each 12 month period following the date of commencement of the action. Construction commenced on 11 September 2019 and therefore compliance reporting covered a 12-month period from 11 September each year.

However, Condition 9 of the varied conditions to EPBC 2017/7930 requires that a compliance report be prepared for each annual compliance period (ACR period). The ACR period denotes each subsequent 12-month period following the date of approval decision. As the varied approval decision is dated 23 May 2025, the first compliance report under the varied conditions will need to cover the period from 23 May 2025 – 23 May 2026.

This compliance report has been prepared to cover the period from 11 September 2024 – 11 September 2025 to ensure compliance is reported to the Department in the interim timeframe until the next compliance report is prepared for the period from 23 May 2025 – 23 May 2026 in accordance with the varied conditions of EPBC 2017/7930.

Current activities undertaken during this period covered by this report include:

- Carrying out of management actions relating to the implementation of Offset Management Plans (OMPs) for the three offset sites including:
 - Weed and pest management.
 - Monitoring and reporting.
- Responding to written requests from the Department, providing compliance records and notifications.

1.2 New environmental risk

Biosis conducted an environmental audit in October 2024 to assess compliance with the requirements and conditions of the three approved Offset Management Plans. The audit identified a lack of evidence to demonstrate that the following items have been completed, which may present new environmental risks:

- Formal monitoring for the presence of pest animals (including systematic spotlight surveying) has not occurred annually in November for the Sievers Lane, Glenhope offset site.
- The boundary of the Sievers lane, Glenhope offset site has not been delineated with posts marking.
- Weed mapping and tree/shrub monitoring had not been included in the annual monitoring reports for Sievers Lane, Glenhope.
- Annual monitoring and reporting have not been undertaken at the Shelford-Mt Mercer Road, Shelford offset site in accordance with the Offset Management Plan.
- Annual monitoring and reporting have not been undertaken at the Hamilton Road, New Gisborne offset site in accordance with the Offset Management Plan.

Biosis provided advice and recommendations to the landowners as part of the Year 4 audit.

1.3 Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. 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

Full name

Position

Organisation

Date

____/____/____

2 Compliance table

This section addresses the requirement in the *Annual Compliance Report Guidelines* (DoE, 2014) for a compliance table. Table 1 includes the full wording of all conditions under EPBC 2017/7930 approval, the condition reference number, a designation regarding compliance or non-compliance, a summary of evidence and comments, and references to other parts of this compliance report which relate to the approval condition.

Table 1 EPBC approval compliance table

Condition number	Condition	Is the project compliant with this condition?	Evidence / comments
1	<p><i>The approval holder must not clear more than the following in the project area:</i></p> <ul style="list-style-type: none"> a. 21.75 ha of Golden Sun Moth habitat b. 10.52 ha of Matted Flax-lily habitat c. 1.608 ha of NTGVVP. 	Compliant	No further vegetation or habitat clearing has occurred beyond the areas authorised under EPBC 2017/7930.
2	<p><i>To compensate for the loss of 20.53 ha of Golden Sun Moth habitat; 9.89 ha of Matted Flax-lily habitat; and 1.608 ha of NTGVVP, the approval holder must implement the following offset management plans:</i></p> <ul style="list-style-type: none"> a. The New Gisborne Offset Management Plan b. The Shelford Offset Management Plan c. The Sievers Lane Offset Management Plan 	Partially non-compliant	<p>Three offset sites were secured, and the following offset management plans were submitted and approved by the Department:</p> <ul style="list-style-type: none"> • Sievers Lane, Glenhope, Victoria: Golden Sun Moth Offset Management Plan (EPBC 2017/7930), dated 12 March 2019 (Biosis 2019a). • Alliance Business Park EPBC Act Offset Management Plan: 250-290 Hamilton Road, New Gisborne (EPBC 2017/7930), dated 12 March 2019 (Biosis 2019b). • Alliance Business Park EPBC Act Offset Management Plan: Shelford-Mt Mercer Road Shelford (Thurlgona) (EPBC 2017/7930), dated 13 March 2019 (Biosis 2019c). <p>The OMPs were approved by the Department in March 2019.</p> <p>The three OMPs have not been implemented in full in accordance with the management commitments. More detail is provided in Table 2 below.</p>

2A	<i>To compensate for the loss of 1.22 ha of Golden Sun Moth habitat, the approval holder must, by 31 October 2025, submit to the department for the Minister's approval, an Offset Management Plan for the Boyers Road offset area.</i>	Compliant	An Offset Management Plan for the Boyers Road offset area (Biosis 2025a) was submitted to the Department on 6 th August 2025.
2B	<i>To compensate for the loss of 0.63 ha of Matted Flax-lily habitat, the approval holder must, by 31 October 2025, submit to the department for the Minister's approval, an Offset Management Plan for the Allison's Road offset area.</i>	Compliant	An Offset Management Plan for the Allison's Road offset area (Biosis 2025b) was submitted to the Department on 6 th August 2025.
2C	<p><i>The Offset Management Plans (OMPs) submitted in accordance with conditions 2A and 2B of this approval, must each:</i></p> <ul style="list-style-type: none"> <i>a. be prepared by a suitably qualified ecologist;</i> <i>b. include maps and a description of the relevant offset area including location, habitat quality and the current area of habitat for Golden Sun Moth or Matted Flax-lily;</i> <i>c. specify the method used for assessing habitat quality specific to Golden Sun Moth or Matted Flax-lily;</i> <i>d. specify offset completion criteria that will be used to assess whether the outcomes required under condition 2I of this approval have been achieved or maintained;</i> <i>e. include timebound commitments to achieve the specified offset completion criteria;</i> <i>f. include timebound interim targets derived from the offset completion criteria, that will be achieved to demonstrate progress consistent with attainment or maintenance of those completion criteria;</i> <i>g. detail the management activities, including timeframes or circumstances for implementing those activities, that will be implemented to achieve the interim targets and offset completion criteria;</i> <i>h. detail the nature, timing and frequency of monitoring activities that will be implemented to:</i> 	Compliant	The OMPs for Boyers Road and Allison's Road have been prepared in accordance with the requirements of Condition 2C.

	<ul style="list-style-type: none"> i. <i>detect changes in habitat quality for Golden Sun Moth or Matted Flax-lily at the offset areas; an</i> ii. <i>demonstrate attainment of interim targets and offset completion criteria, and detect potential or actual failure to achieve or maintain interim targets and offset completion criteria;</i> i. <i>detail timebound, feasible and effective corrective measures, to be implemented in the event monitoring indicates any potential or actual failure to achieve or maintain interim targets and offset completion criteria; and</i> j. <i>include a risk analysis, and risk management and mitigation strategy, for all risks to the successful implementation of the Offset Management Plan, including a rating of all initial and post-mitigation residual risks.</i> 		
2D	<i>Following submission of an OMP in accordance with conditions 2A and 2B of this approval, and prior to making any decision regarding the OMP, if the Minister makes a written request to the approval holder to make specified revisions to the submitted OMP in order to address the requirements of condition 2C, the approval holder must revise the OMP and re-submit it to the department in accordance with any such request.</i>	Not applicable	To date, the Minister has not requested any revisions to the Allisons Road or Boyers Road OMPs.
2E	<i>The approval holder must implement the OMP for the Boyers Road offset area approved by the Minister from the date it is approved by the Minister and continue to implement the OMP until the expiry of this approval.</i>	Not applicable	As of November 2025, the Boyers Road OMP has not yet been approved by the Minister.
2F	<i>The approval holder must implement the OMP for the Allisons Road offset area approved by the Minister from the date it is approved by the Minister and continue to implement the OMP until the expiry of this approval.</i>	Not applicable	As of November 2025, the Allisons Road OMP has not yet been approved by the Minister.

2G	<i>The approval holder must legally secure the Boyers Road offset area within 12-months following the Minister's approval of the respective OMP.</i>	Not applicable	As of November 2025, the Boyers Road OMP has not yet been approved by the Minister.
2H	<i>The approval holder must legally secure the Allisons Road offset area within 12-months following the Minister's approval of the respective OMP.</i>	Not applicable	As of November 2025, the Allisons Road OMP has not yet been approved by the Minister.
2L	<p><i>The approval holder must achieve the following outcomes:</i></p> <ul style="list-style-type: none"> <i>a. within 10 years following the Minister's approval of the OMP for the Boyers Road offset area, habitat quality for Golden Sun Moth at the Boyers Road offset area scores at least 7 out of 10 using the habitat quality scoring protocol specified in the approved OMP for the Boyers Road offset area; and</i> <i>b. within 10 years following the Minister's approval of the OMP for the Allisons Road offset area, habitat quality for Matted Flax-lily at the Allisons Road offset area scores at least 6 out of 10 using the habitat quality scoring protocol specified in the approved OMP for the Allisons Road offset area; and</i> <i>c. having achieved the habitat quality improvements required by a. and b., the habitat quality scores for each offset area are maintained or increased for the remainder of the period of effect of this approval.</i> 	Not applicable	As of November 2025, the Boyers Road and Allisons Road OMP have not yet been approved by the Minister, therefore management actions have not commenced.
3	<i>Revoked.</i>	N/A	N/A
4	<i>The approval holder must submit a Matted Flax-lily Translocation Plan for the salvage of all Matted Flax-lily plants to be removed as part of the action, and translocation of those plants to the recipient sites. The approval holder must not commence the action until the Matted Flax-lily Translocation Plan has been approved by the Minister. Once</i>	Compliant	<p>A Matted Flax-lily Translocation Plan was prepared and approved by the Department on 12 February 2019 (Biosis 2019d).</p> <p>The Translocation Plan is being implemented as intended and the following actions have been undertaken:</p> <ul style="list-style-type: none"> • 23 Matted Flax-lily plants were translocated to the Epping North Conservation Reserve in September 2020.

	<i>approved, the approved Matted Flax-lily Translocation Plan must be implemented.</i>		<ul style="list-style-type: none"> Biosis has prepared annual monitoring reports for the first, second, third and fourth-year post-translocation. Year 5 monitoring will take place between 1 October 2025 and 1 March 2026, in accordance with the Translocation Plan.
5	<i>Pre-clearance surveys, as required under condition 4, must be undertaken by a suitably qualified expert within one month prior to any translocation activities being undertaken. The approval holder must document the results of the surveys. Any additional Matted Flax-lily plants identified during the pre-clearance surveys that were not previously recorded must be salvaged and translocated in accordance with the approved Matted Flax-lily Translocation Plan.</i>	Compliant	Pre-clearance surveys for Matted Flax-lily were undertaken on 11 January 2019.
6	<p><i>To protect habitat for listed threatened species, the approval holder must:</i></p> <ol style="list-style-type: none"> <i>establish the Edgars Creek Corridor and install signage and temporary fencing within 20m of the Edgars Creek Corridor prior to commencement of the action;</i> <i>ensure that no vehicles or unauthorised people enter the Edgars Creek Corridor, until all construction has been completed; and</i> <i>until the expiry of this approval:</i> <ol style="list-style-type: none"> <i>prevent access to the Edgars Creek Corridor including through, but not limited to, the installation of permanent fencing following construction; and</i> <i>implement hygiene controls for all vehicles and personnel that will be going within 30 metres of the Edgars Creek Corridor.</i> 	Compliant	<p>Temporary fencing was established along the boundary of the Edgars Creek corridor prior to works in September 2019 and monitored during works until construction permanent fencing was established in November 2020.</p> <p>Where infrastructure works were undertaken in the creek corridor, manual handling was prioritised, machinery movement was kept to a minimum and vehicles decontaminated prior to entry. Outside specified works windows vehicles were not permitted to enter the Edgars Creek corridor with the area considered a 'No Go Zone'.</p> <p>The Edgars Creek corridor has been secured with permanent fencing (i.e. timber bollards) to prevent vehicle access.</p>
6A	<i>The approval holder must implement the Edgars Creek Management Plan until the expiry date of this approval.</i>	Compliant	Previously, two management plans existed for EPBC approvals EPBC 2012/6298 and EPBC 2017/7930: <i>The Alliance Business Park 275 O'Herns Road, Epping: Edgars Creek Management Plan</i> dated 20 September 2013 (EPBC 2012/6298) and <i>165-195 O'Herns Road, Epping: Edgars Creek Management Plan</i>

			<p>dated 18 September 2017. They were consolidated into one management plan: <i>Alliance Business Park, O'Herns Road, Epping: Edgars Creek Management Plan</i> dated 29 July 2022.</p> <p>The northern section of Edgars Creek was handed over to the City of Whittlesea (CoW) in July 2023. The plan is being implemented as intended, including ongoing weed management and wetland monitoring.</p>
6B	<i>By 30 June 2025, the approval holder must submit a revised version of the Edgars Creek Management Plan to the department for the Minister's approval.</i>	Compliant	<p>The consolidated management plan was submitted to the Department for approval on 3 February 2023 (Biosis 2022). Having received no response from the Department, the plan was submitted to the Department again on 26 June 2025 for review and approval.</p>
6C	<p><i>The revised Edgars Creek Management Plan submitted in accordance with condition 6B of this approval must:</i></p> <ol style="list-style-type: none"> <i>be prepared by a suitably qualified expert;</i> <i>be consistent with the Department's Environmental Management Plan Guidelines;</i> <i>include maps that show the location and extent of habitats for listed threatened species in the Edgars Creek Corridor;</i> <i>include survey results, quantified ecological data, and other supporting evidence that demonstrate the habitat quality of habitats for listed threatened species in the Edgars Creek Corridor;</i> <i>include commitments to:</i> <ol style="list-style-type: none"> <i>protect and conserve habitats for listed threatened species in the Edgars Creek Corridor at least until the expiry of this approval; and</i> <i>maintain or improve the habitat quality and extent of habitats for listed threatened species in the Edgars Creek Corridor at least until the expiry of this approval;</i> 	Compliant	<p>The consolidated management plan was submitted to the Department for approval on 3 February 2023 (Biosis 2022) and again on 26 June 2025. Department comments were provided on the Edgars Creek Management Plan on 2 October 2025.</p> <p>The Management Plan is currently being revised in accordance with Department comments and the requirements of Condition 6C.</p>

	<p>f. <i>specify the parties responsible for the stated commitments;</i></p> <p>g. <i>include a risk analysis of all events or circumstances that may prejudice the successful implementation of the commitments, or deleteriously effect the habitat quality or extent of habitats for listed threatened species, in the Edgars Creek Corridor (risks);</i></p> <p>h. <i>detail feasible and effective strategies and management activities, including timeframes or circumstances for implementing those activities, that will be implemented to avoid and mitigate identified risks;</i></p> <p>i. <i>include a rating of all risks pre- and post-mitigation; and</i></p> <p>j. <i>detail the nature, timing and frequency of monitoring activities that will be implemented to detect risks and changes to the habitat quality and extent of habitats for listed threatened species in the Edgars Creek Corridor, and ensure the commitments made in the plan are met.</i></p>		
6D	<p><i>Following submission of the revised Edgars Creek Management Plan in accordance with condition 6B of this approval, and prior to making any decision regarding the revised Edgars Creek Management Plan, if the Minister makes a written request to the approval holder to make specified revisions to the submitted revised Edgars Creek Management Plan, to address the requirements of condition 6C, the approval holder must revise the revised Edgars Creek Management Plan and re-submit it to the department in accordance with any such request.</i></p>	Compliant	<p>The consolidated management plan was submitted to the Department for approval on 3 February 2023 (Biosis 2022) and again on 26 June 2025. Department comments were provided on the Edgars Creek Management Plan on 2 October 2025.</p> <p>The Management Plan is currently being revised in accordance with Department comments and the requirements of Condition 6C.</p>
7	<p><i>Within 14 days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement of the action.</i></p>	Compliant	<p>MAB wrote to the Department on 20 September 2019 (9 days following commencement of the action) as part of the non-compliance reporting associated with Condition 1. Among other items, the letter advised that works had commenced at the site pursuant to EPBC approval 2017/7930.</p>

8	<i>The approval holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records.</i>	Compliant	<p>Accurate records have been kept of all management activities associated with the relevant conditions of approval.</p> <p>Records are stored and documented in an online folder filing system. Records are organised in accordance with the corresponding EPBC approval condition and further separated into the relevant reporting period.</p>
8A	<i>If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.</i>	Not applicable	No such request has been received.
9	<i>Within 3 months following the end of each ACR period, the approval holder must publish the compliance report for that ACR period on the website in a format that is easily accessible and downloadable.</i>	Compliant	<p>The ACR period denotes each subsequent 12-month period following the date of approval decision. As the approval decision is dated 23 May 2025, the first compliance report under the varied conditions will need to cover the period from 23 May 2025 – 23 May 2026.</p> <p>This compliance report has been prepared to cover the period from 11 September 2024 – 11 September 2025 to ensure compliance is reported to the Department in the interim timeframe until the next compliance report is prepared for the period from 23 May 2025 – 23 May 2026 in accordance with the varied conditions of EPBC 2017/7930.</p>
9A	<i>Within 3 months following the end of each ACR period, the approval holder must publish the compliance report for that ACR period on the website in a format that is easily accessible and downloadable.</i>	Compliant	The compliance report was published on the proponent's website in December 2025.
9B	<p><i>Each compliance report must include the following as relevant to the associated ACR period:</i></p> <ul style="list-style-type: none"> <i>a. accurate and complete details of compliance and non-compliance with:</i> <ul style="list-style-type: none"> <i>i. each condition attached to this approval; and</i> <i>ii. all commitments made in each plan;</i> <i>b. a schedule of plans in effect during the ACR period;</i> 	Compliant	<p>This compliance report has been prepared in accordance with the requirements of Condition 9B.</p> <p>See Table 3 for a review of plans in effect during the ACR period.</p>

	<ul style="list-style-type: none"> c. <i>accurate and complete details of how each plan was implemented during the ACR period; and</i> d. <i>maps that show clearly the extent of:</i> <ul style="list-style-type: none"> i. <i>protected matters cleared within the project area; and</i> ii. <i>protected matters cleared within the ACR period; and</i> e. <i>if any incidents occurred, accurate and complete details of each incident.</i> 		
9C	<i>The approval holder must exclude or redact sensitive biodiversity data from each compliance report published on the website or otherwise provided to a member of the public.</i>	Compliant	No sensitive biodiversity data is included within this compliance report.
9D	<i>If sensitive biodiversity data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, the approval holder must submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.</i>	Not applicable	
9E	<p><i>The approval holder must notify the department electronically, within 5 business days of publishing each compliance report, that a compliance report has been published on the website. In this notification, the approval holder must provide the department with:</i></p> <ul style="list-style-type: none"> a. <i>the web address for where the compliance report is published on the website; and</i> b. <i>shapefiles showing all clearing of listed threatened species, and their habitat, undertaken within the ACR period.</i> 	Compliant	The compliance report was published in early December 2025 and the Department was notified within 5 business days.
9F	<i>The approval holder must keep each compliance report published on the website from the date it is published and until the expiry date of this approval.</i>	Compliant	The compliance report was published on the proponent's website in early December 2025.

10	<i>The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period.</i>	Not applicable	The audit period denotes each subsequent 5-year period commencing 1 August 2022. The first independent audit will be undertaken in 2027.
10A	<i>The approval holder must submit details of the proposed independent auditor and their qualifications to the department for approval within 10 business days following the end of each audit period.</i>	Not applicable	
10B	<i>The approval holder must ensure the scope of each independent audit is sufficient to determine the compliance status for each condition of approval, and each commitment made in each plan.</i>	Not applicable	
10C	<i>The approval holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the Independent Audit and Audit Report Guidelines.</i>	Not applicable	
10D	<i>The approval holder must submit an audit report to the department for written agreement from the department within 3 months following the end of each audit period, or as otherwise directed by the Minister in writing.</i>	Not applicable	
10E	<i>The approval holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the Independent Audit and Audit Report Guidelines to the extent that the Independent Audit and Audit Report Guidelines are consistent with these conditions.</i>	Not applicable	
10F	<i>The approval holder must publish each audit report on the website, in a format that is easily accessible and downloadable, within 10 business days of the date the department agrees to the audit report in writing.</i>	Not applicable	
10G	<i>The approval holder must notify the department within 5 business days of the date the audit report is published on the website. In this notification, the approval holder must provide</i>	Not applicable	

	<i>the department with the web address for where the audit report is published on the website.</i>		
10H	<i>The approval holder must keep each audit report published on the website from the first date which that audit report must be published and until the expiry of this approval.</i>	Not applicable	
11	<i>The approval holder may choose to revise the Edgars Creek Management Plan without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the revised Edgars Creek Management Plan would not be likely to result in a new or increased impact.</i>	Not applicable	The Edgars Creek Management Plan is currently being revised in accordance with Conditions 6C and 6D and will be submitted to the Department for review and approval.
11A	<i>If the approval holder chooses to revise the Edgars Creek Management Plan in accordance with condition 11 of this approval, the approval holder must submit the following to the department:</i> <ul style="list-style-type: none"> <i>a. an electronic copy of the revised Edgars Creek Management Plan;</i> <i>b. an electronic copy of the revised Edgars Creek Management Plan, that includes tracked changes, showing the difference between the revised Edgars Creek Management Plan and the Edgars Creek Management Plan;</i> <i>c. a written explanation of all differences between the Edgars Creek Management Plan and the revised Edgars Creek Management Plan; and</i> <i>d. compliance records demonstrating compliance with and implementation of the Edgars Creek Management Plan.</i> 	Not applicable	The Edgars Creek Management Plan is currently being revised in accordance with Conditions 6C and 6D and will be submitted to the Department for review and approval.
11B	<i>Unless otherwise agreed to in writing by the department, the approval holder must not implement the Edgars Creek Management Plan revised in accordance with condition 11, until at least 30 business days after submitting all the information required by condition 11A.</i>	Not applicable	
12	<i>The approval holder may at any time revoke its choice to implement the Edgars Creek Management Plan which has</i>	Not applicable	

	<i>been revised without submitting it for the Minister's approval by giving written notice to the department. If the approval holder revokes the choice to implement the revised Edgars Creek Management Plan, the approval holder must implement the Edgars Creek Management Plan in force immediately prior to the revised Edgars Creek Management Plan.</i>		
13	<i>Revoked.</i>		
14	<p><i>If the Minister notifies the approval holder that the Minister is satisfied that the taking of the action in accordance with the Edgars Creek Management Plan revised in accordance with condition 11 would be likely to have a new or increased impact, then:</i></p> <ul style="list-style-type: none"> <i>a. the approval holder's ability to revise the Edgars Creek Management Plan without submitting it for the Minister's approval ceases to apply in relation to that revision of the Edgars Creek Management Plan; and</i> <i>b. from the date notified, the approval holder must implement the version of the Edgars Creek Management Plan in force immediately prior to the revised Edgars Creek Management Plan.</i> 	Not applicable	No such notification from the Minister has been received to date.
15	<i>Revoked.</i>		
16	<i>If, at any time after 5 years from the date of this approval, the approval holder has not commenced the action, then the approval holder must not commence the action without the written agreement of the Minister.</i>	Not applicable	The action commenced on 11 September 2019.
17	<p><i>Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 30 business days of the date:</i></p> <ul style="list-style-type: none"> <i>a. the plan is approved by the Minister in writing in accordance with the conditions of this approval, or section 143A of the EPBC Act; or</i> 	Compliant	<p>Management reports, including the approved Offset Management Plans, Edgars Creek Management Plan and MFL Translocation Plan, are published on the proponent's website.</p> <p>The Boyers Road and Allison's Road OMPs and the revised Edgars Creek Management Plan will be published once approved by the Minister.</p>

	<i>b. the plan is submitted to the department in accordance with condition 11A of this approval.</i>		
18	<i>The approval holder must keep all plans published on the website, in a format that is easily accessible and downloadable, from the first date which that plan must be published and until the expiry date of this approval. This requirement applies to all current and superseded versions of plans.</i>	Compliant	Management reports, including the approved Offset Management Plans, Edgars Creek Management Plan and MFL Translocation Plan, are published on the proponent's website.
19	<i>The approval holder is required to exclude or redact sensitive biodiversity data from any version of a plan before that plan is published on the website or otherwise provided to a member of the public. If sensitive biodiversity data is excluded or redacted from a plan, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.</i>	Compliant	No sensitive biodiversity data has been identified or redacted.

2.1 Correcting non-compliances

Table 2 specifies all conditions under EPBC 2017/7930 approval that are subject to non-compliance, the condition reference number, and a summary of corrective measures to be implemented.

Table 2 EPBC approval non-compliance table

Condition number	Description of non-compliance	Corrective measure
2	<p>The three OMPs have not been implemented in full in accordance with the management commitments. MAB entered into a Credit Trading Agreement (CTA) for each of the three offset sites in accordance with EPBC 2017/7930. Clause 8 (Offset Management Plan) of all three agreements outlines landowner responsibilities, including the obligation to undertake ongoing management, species surveys (where relevant) and annual monitoring in accordance with the relevant OMP. Non-compliance with these OMP's is described below.</p> <p>Sievers Lane, Glenhope, Victoria: Golden Sun Moth Offset Management Plan</p> <ul style="list-style-type: none"> The Department's compliance audit report noted that the boundary of the offset site was unable to be clearly identified. However, the boundary can be delineated electronically and workers can determine their location using a table or their phone. <p>250-290 Hamilton Road, New Gisborne Offset Management Plan</p> <ul style="list-style-type: none"> One annual report was prepared for the 2021 – 2022 (Year 2) reporting period. No other annual landowner reports have been provided. Control of rabbits has not been successful. <p>Offset Management Plan: Shelford-Mt Mercer Road Shelford (Thurlgona)</p> <ul style="list-style-type: none"> Year 1 annual report prepared, including GSM monitoring during the 2020-21 flight season and vegetation monitoring in spring 2020. Year 2 and 3 annual reports were prepared, however did not include the results of any GSM monitoring. It is unclear whether GSM monitoring has been undertaken in Years 2-3. The Department's compliance audit report noted that the boundary of the offset site was unable to be clearly identified. However, the boundary can be delineated electronically and workers can determine their location using a table or their phone. 	<p>Landowner non-compliance was reported to the Department in October 2024.</p> <p>Biosis, on behalf of MAB, has made attempts to obtain the missing landowner reports as part of its 2022 Year 1 audit, annual compliance reporting, 2024 Department compliance audit and the Year 4 audit.</p> <p>Biosis, on behalf of MAB has discussed annual reporting requirements and ongoing management requirements with the landowners.</p>

2.2 Plans in effect during the ACR period

Table 3 specifies all plans associated with EPBC 2017/7930 approval that were in effect during the ACR period and details on how these plans were implemented.

Table 3 Management plans in effect

Plan	Management action	Implementation
Sievers Lane, Glenhope, Victoria: Golden Sun Moth Offset Management Plan	<ul style="list-style-type: none"> Year 4 ecological audit Landowner monitoring Management works 	<p>In the reporting period, the landowner conducted management works including ongoing weed control, pest animal spotlighting, controlled grazing, regular site inspections and annual reporting. Non-compliance with the OMP is summarised in Table 2.</p> <p>Biosis undertook the Year 4 ecological audit on 11 November 2024. Follow-up advice and recommendations was provided to the landowner to rectify non-compliance with the OMP.</p>
250-290 Hamilton Road, New Gisborne Offset Management Plan	<ul style="list-style-type: none"> Year 4 ecological audit Landowner monitoring Management works 	<p>In the reporting period, the landowner conducted management works including weed control, pest animal shooting (i.e. rabbits) and regular inspections. Non-compliance with the OMP is summarised in Table 2.</p> <p>Biosis undertook the Year 4 ecological audit on 15 November 2024. Follow-up advice and recommendations was provided to the landowner to rectify non-compliance with the OMP.</p>
Offset Management Plan: Shelford-Mt Mercer Road Shelford (Thurlgona)	<ul style="list-style-type: none"> Year 4 ecological audit Landowner monitoring Management works 	<p>In the reporting period, the landowner conducted management works including spot spraying of weeds and regular site inspections. Non-compliance with the OMP is summarised in Table 2.</p> <p>Biosis undertook the Year 4 ecological audit on 7 November 2024. Follow-up advice and recommendations was provided to the landowner to rectify non-compliance with the OMP.</p>
Edgars Creek Management Plan	<ul style="list-style-type: none"> Annual wetland and weed monitoring Management works 	<p>Biosis undertook annual monitoring of the Edgars Creek (southern zone) on 28 October 2024 in accordance with the Edgars Creek Management Plan to evaluate Year 3 actions. Recommendations for weed control were provided to MAB following the monitoring event.</p> <p>Ongoing management of the Edgars Creek corridor (southern zone) continues to be implemented by MAB. Ongoing management of the northern zone continues to be implemented by the City of Whittlesea.</p>
MFL Translocation Plan	<ul style="list-style-type: none"> Annual monitoring Management 	<p>Biosis undertook Year 4 annual monitoring on 3 December 2024 and the report was issued on 11 February 2025. Ongoing management of the MFL plants was undertaken by the City of Whittlesea during the ACR period.</p>

Plan	Management action	Implementation
		Year 5 monitoring will take place between 1 October 2025 and 1 March 2026, in accordance with the Translocation Plan.

References

Biosis 2019a. *Sievers Lane, Glenhope, Victoria: Golden Sun Moth Offset Management Plan (EPBC 2017/7930)*, Report prepared for Alliance Business Park Pty Ltd. Author: Mueck, S., Biosis Pty Ltd, Melbourne, VIC. Project no. 28455.

Biosis 2019b. *Alliance Business Park EPBC Act Offset Management Plan: 250-290 Hamilton Road, New Gisborne (EPBC 2017/7930)*, Report prepared for Alliance Business Park Pty Ltd. Author: Mueck, S. Biosis Pty Ltd, Melbourne, VIC. Project No. 28455.

Biosis 2019c. *Alliance Business Park EPBC Act Offset Management Plan: Shelford – Mt Mercer Road Shelford (Thurlgona) (EPBC 2017/7930)*, Report prepared for Alliance Business Park Pty Ltd. Author: Mueck, S. Biosis Pty Ltd, Melbourne, VIC. Project No. 28455.

Biosis 2019d. *Alliance Business Park, 165 - 195 O'Herns Road, Epping: Matted Flax-lily Translocation Plan*, Report for Alliance Business Park Pty Ltd. Mueck, S, Biosis Pty Ltd, Melbourne. Project No. 28455.

Biosis 2024. *Edgars Creek South, Epping: Land Rehabilitation Plan*, Prepared for MAB Corporation. Author: Davis-Tope, J, Biosis Pty Ltd, Melbourne, VIC. Project no. 38934.

Biosis 2025a. *Boyers Road, Glenhope, Victoria: Golden Sun Moth Offset Management Plan (EPBC 2017/7930)*, Report for Alliance Business Park. Author: Mueck S, Biosis Pty Ltd, Melbourne. Project no. 38934.

Biosis 2025b. *Allisons Road, Nulla Vale: Offset Management Plan for Matted Flax-lily *Dianella amoena* (EPBC 2017/7930)*, Report for Alliance Business Park. Author: Mueck S, Biosis Pty Ltd, Melbourne. Project no. 38934.

