BHP Mitsubishi Alliance

Appendix I

Response to Public Comment Submissions

Abbreviations

BMA	BM Alliance Coal Operations Pty Ltd
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Cth)
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Cth)
MHQA	Modified Habitat Quality Assessment
MNES	Matters of National Environmental Significance
OAG	Offsets Assessment Guide
Offset Policy	EPBC Act Environmental Offsets Policy (Cth)
OMP	Offset Management Plan
PD	Preliminary Documentation
VDec	Voluntary Declaration
VM Act	*Vegetation Management Act 1999* (Qld)

1 Response to submissions

Following the DCCEEW issuing a Direction to Publish, BMA published the Peak Downs Mine Power Lines Realignment Project (EPBC 2024/09983) Preliminary Documentation, inviting public comment. The documentation was available for public comment from 7th April 2026 to close of business 20th April 2026. BMA received two public comment submissions during the notification period. The submissions have been formally considered, and ***Table 1*** provides individual responses to the submissions received.

Table 1 Response to public comment submissions

Submitter Number	Submission	BMA response to submissions
1	EnvA recommends that the Minister refuse the Project based on: • Unacceptable impacts to threatened species and communities that will not be appropriately mitigated through the proposed offsets, and • The Project cannot be justified without the approval and progression of the associated Peak Downs Continuation Project.	Noted. See note below regarding relationship with proposed Peak Downs Mine Continuation Project.
	<u>Significant impact on threatened species and communities and migratory species</u> The project would or has the potential to impact on numerous threatened species and communities listed under the EPBC Act. Of note, the Proponent has identified direct impacts on: • 0.4ha of brigalow (Acacia harpophylla dominant and co-dominant) (Endangered) • 0.57ha of Natural grasslands of the Queensland Central Highlands and northern Fitzroy Basin (Threatened ecological community) • 17.57ha of koala habitat (Phascolarctos cinereus) (Endangered) • 6.42ha of greater glider habitat (Petauroides volans) (Endangered) • 22.77ha of squatter pigeon habitat (Geophaps scripta scripta) (Vulnerable) • 0.19ha of ornamental snake habitat (Denisonia maculata) (Vulnerable) EnvA notes that these species are regularly identified in applications for new and expanding coal mines in Central Queensland. The conservation status of some of these species and communities has declined in the last few years. By way of example, koalas and greater gliders were reclassified from Vulnerable to Endangered in 2022. We also note that the Proponent has indicated that this project has the potential for a significant impact on koalas and greater gliders (Tables 11 and 12 in the MNES Significant Impact Assessment Report), and may also result in some impacts on the other listed MNES. The pre-clearing cover for the Isaac-Comet Downs subregion is estimated at approximately 2,693,397 ha compared to 570,968 ha that remains (Accad et al. 2023). Therefore, 78.8% of vegetation cover has already	Noted. Impact to threatened species and communities has been assessed in accordance with the MNES Significant Impact Guidelines 1.1 as required by the EPBC Act. The guideline criteria incorporate consideration of contribution of the impact to survival of the species. Refer to Appendix C of the PD for the detailed technical assessment for each target species and ecological community against the Significant Impact Guidelines 1.1. Section 4.1.1 of Appendix C of the PD presents Figure 5. This figure presents remnant/high value regrowth vegetation communities within the action area and in a 10km radius. Those areas outside of the action area will not be removed and/or impacted as part of this action.

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	been cleared in this Brigalow Belt subregion which means that any further habitat loss or disturbance is likely to result in significant impact on threatened species and ecosystems. We acknowledge that this Project is comparatively small compared to the large areas already cleared, or proposed to be cleared for coal mining in the Isaac-Comet Downs subregion which include (but not limited to): • Vulcan Coal, Vulcan Coal infrastructure and Vulcan South • Peak Downs and Peak Downs Continuation Project • Saraji, Saraji East, Saraji Grevillea Pit extension, and • Lake Vermont and Lake Vermont Meadowbrook Extension. Combined, these projects have already, or if approved and progressed, will clear thousands of hectares of threatened ecological communities and species habitat, including the species that have been listed above for this Project. Every hectare of threatened species habitat is now critical to protect to prevent the further decline in conservation status. EnvA does not agree with the Proponent's assertion that substantial remnant vegetation within the survey area and broader region will remain undisturbed and continue to provide habitat for MNES (Section 4.1.11). There are also additional coal projects proposed within the Bowen Basin that will further impact threatened species and communities in the broader Central Queensland region. The mapping provided in the referral documents does not clearly define the location of the Project in the context of the proposed coal mine projects, nor does it depict the areas which are secured and "will remain undisturbed and continue to provide habitat for threatened species".	
	<u>Proposed offset management plan</u> The Proponent considers that the proposed offset area of 115.56 ha of land on Croydon Station exceeds legislative requirements – a location approximately 80km from the project area. The Proponent considers that MNES offsets will only be required for the koala and greater glider. It is EnvA's view that offsets must be required for all impacts on MNES to ensure there is a measurable conservation gain as required under the EPBC Act Offsets Policy. The permanent loss of threatened species habitat from this project must be considered significant as the cumulative loss is leading to the further decline of their conservation status.	Noted. Please see the following responses to the corresponding points: 1. The offset site and ongoing management measures to compensate the proposed impacts to MNES have been selected to meet the Offset Policy and requirements from DCCEEW. There are frequent references throughout the OMP

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	In addition to this, EnvA notes that the proposed offset area does not replace the habitat that will be destroyed by this project. The offset area management plan only proposes to marginally improve the habitat quality of an already vegetated area where koalas and greater gliders already occur and at a considerable distance from the project area. EnvA further considers that the proposed offset fails to meet the requirements of the EPBC Act Environmental Offsets Policy. Specifically: 1. Suitable offsets must deliver an overall conservation outcome that improves or maintains the viability of the protected matter. Offsets must deliver an outcome that improves or maintains the viability of the protected matter relative to a "do nothing" scenario. In this case, the offset area already supports the listed species, and no evidence is presented to demonstrate that it can sustain higher population densities or expanded ecological functions. This means the offset does not create new habitat or improve long-term viability; rather, it preserves what already exists. Therefore, it fails to provide an additional conservation outcome. 2. Tenure for direct offsets to constitute a legitimate offset, requires that the site must be legally secured in a way that ensures long-term protection and management. As identified in the Offset Area Management Plan, the proposed offset area is to be secured through a Voluntary Declaration under the Vegetation Management Act 1999 (VM Act). The use of a Voluntary Declaration under the VM Act—while legally recognised—is insufficient for enduring protection. The declaration is dependent on the landholder's agreement and only remains in place until the objectives of the OAMP are achieved, the declaration ends, or when the authorised activities have ended (s19 of the VM Act). 3. Suitable offsets must be of a size and scale proportionate to the residual impacts on the protected matter. The proposed offset area is linear in nature and not connected to any other 'secured' offset area (Figure 2). While improved management of threatened species habitat is positive, the linear nature of the proposed offset and lack of connectivity with secured habitat is inconsistent with the EPBC Act Environmental Offsets Policy and relevant recovery plans for koalas and greater gliders. 4. Suitable offsets must be additional to what is already required, determined by law or planning regulations, or agreed to under other schemes of programs. EnvA considers that the proposed offset area already has a level of protection under the VM Act and the revised EPBC Act. The VM Act regulates the clearing of vegetation in a way that conserves remnant vegetation, prevents loss of biodiversity and maintains ecological function. Likewise, the EPBC Act amendments now require approvals for: • Clearing of vegetation that has not been cleared for at least 15 years, and	that cross-reference compliance and alignment with the Offset Policy. This includes, but is not limited to, Section 1.3 *Compliance with EOP*, Section 3.2 *Management Objectives*, and Appendix D – *Offset Area Habitat Quality Modelling*. 2. The OMP states that a VDec under the VM Act and a covenant under the *Land Act 1994* will be pursued to secure the offset site (refer Section 7.2.2 of the PD Head Document). These legal mechanisms align with the Offsets Policy. 3. At a landscape context, the offset site provides enhanced connectivity along an important riparian corridor which connects to the offset sites sought under the EPBC Act and secured under the VM Act. Refer to Figure 2 and Figure 6 of the OMP that illustrates the landscape connectivity value, including building connection to surrounding offset sites. 4. The offset site has been selected to meet the Offsets Policy, Offsets Assessment Guide (OAG – the offsets calculator), and EPBC Act in force at time of the referral of the proposed action. Please refer to Section 3.2 *Management Objectives* within the OMP for detail on the additionality the offset site provides, and how this is in accordance with the Offsets Policy. Also refer to Section 1.3 *Compliance with the EOP*, Appendix C – *Offset Assessment Guide Output*, and

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	• Clearing of vegetation from land within 50m of a watercourse, wetland or drainage line within the Great Barrier Reef Catchment area. EnvA also notes broader concerns regarding the effectiveness of biodiversity offsets in Australia. Even the previous Federal Environment Minister has acknowledged that "We know the current offset arrangements are broken and making nature worse. This reinforces the need for strict application of the EPBC Act Environmental Offsets Policy and a precautionary approach to habitat loss. Since the Queensland Environmental Offsets Policy was introduced in 2014, biodiversity indicators— including vegetation extent and condition, and populations of threatened species—have continued to decline across the state. It is essential that the avoidance of impact - not offsetting - remains the priority. Offsets should only ever be used as a last resort. The Project will result in the loss and fragmentation of habitat for multiple endangered and vulnerable species within an already heavily cleared bioregion. The proposed offset fails to meet key EPBC Act Environmental Offsets Policy tests, including additionality, enduring protection, and delivery of a genuine conservation gain. Given the cumulative ecological losses, the limited effectiveness of offsets in highly cleared landscapes, and the availability of alternatives that avoid further habitat destruction, EnvA considers the impacts unacceptable. EnvA therefore recommends that the Project be refused.	Appendix D – *Offset Area Habitat Quality Modelling* within the OMP for further demonstration of compliance with the Offsets Policy, OAG and in force EPBC Act.
	<u>Justification</u> The proposed action involves relocation of existing powerlines associated with the Peak Downs Mine. The relocation is required to support the proposed Peak Downs Mine Continuation Project (EPBC 2022/09350), which is currently subject to a delayed bilateral assessment process. This raises concerns regarding the prohibition on "split referrals" under section 74A of the EPBC Act. The powerline realignment is functionally dependent on, and forms part of, the broader Peak Downs Mine Continuation Project. Assessing this component separately risks fragmenting consideration of cumulative impacts. It is further noted that the Initial Advice Statement for Peak Mine Continuation Project also includes the relocation of a section of transmission line which may be a duplication of part of this Project. In the alternative, if DCCEEW does not consider the referral to constitute an impermissible split referral, EnvA submits that a decision on this Project should not be made prior to determination of the Peak Downs Mine	The proposed action is required to support the existing mining activities at Peak Downs Mine. As stated within the PD Head Document (refer to Section 1 and Section 2.4 of the PD Head Document), the realignment is required so that the existing Peak Downs Mine can continue to the Mining Lease boundary without blasting impacting power lines operation and increasing safety risk. The proposed action, being a power line realignment, is necessary to maintain existing operations regardless of the approval of the Peak

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	Continuation Project. The powerline realignment is not required if the continuation project is not approved or does not proceed. EnvA also notes uncertainty regarding the economic justification for continued expansion of the Peak Downs Mine. Recent public statements and operational decisions by the Proponent indicate changing investment priorities and reduced expansion activity, resulting in the loss of jobs and mothballing approved coal mines. Commonwealth environmental assessment frameworks require consideration of environmental risks alongside claimed economic benefits. When considered in the context of the Peak Downs Mine Continuation Project, the inadequate offset proposal, and uncertainty regarding long-term economic benefits, EnvA considers that the Project does not represent a balanced or justified outcome.	Downs Mine Continuation Project (EPBC 2022/09350).
2	My comments relate to the PD and Offset Management Plan (OMP), dated 4 and 5 March 2026 and published on BMA's website. I have had regard for the requirements of the EPBC Act Environmental Offsets Policy 2012 (the Policy) and the How to use the Offset Assessment Guide (the Guide). As I review environmental impact assessment and management documents, I am mindful they are designed to secure approvals that minimise compliance costs and regulatory risk post-approval. It is then for the regulator to ensure evidence-based, precautionary and enforceable decisions are made on irreversible impacts to ecosystems and species at risk of extinction. I note the Policy and Guide impose an obligation on the regulator to decide on offsets that are, amongst other requirements, informed by scientifically robust information and incorporate the precautionary principle in the absence of scientific certainty. I note offsets are proposed at Croydon Station for the residual significant impacts to the Koala and Greater Glider. I consider BMA has failed to demonstrate the offset provides an adequate and enduring conservation benefit for the Koala and Greater Glider. This is because: - Koala are not present in the offset site; - the offset provides little/no conservation benefit; - habitat quality improvement is inflated; - the reporting period is inadequate; - enduring offset outcomes and protection are uncertain and assumed unlikely;	The documents have been prepared in accordance with the EPBC Act Environmental Offsets Policy (Offsets Policy), OAG, and EPBC Act. Direct responses and where this information is located within the PD package are detailed in the subsequent rows.

<table>
<tr><th>Submitter Number</th><th>Submission</th><th>BMA response to submissions</th></tr>
<tr><td></td><td>

- MHQA core indicator weightings and factors are not Policy-based; and
- the ecological benefits are not supported by site specific andrelevant information.

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<u>Koala are not present</u>

Despite fauna surveys April 2022, and March and November 2025, as outlined in Section 2.1.2, BMA has not demonstrated, directly or indirectly (e.g. by scats), that Koala utilise the offset site. Figure 4 on page 18 shows the location of a single Koala and scats, with none located in the Connors River offset area. BMA has also failed to show the presence of Koala otherwise in the Connors River corridor (Figure 2). BMA has therefore not demonstrated the offset is likely to deliver an overall conservation outcome that improves or maintains the viability' of the Koala, required by Policy Principle 1.

<table>
<tr><th rowspan="2">Criteria</th><th rowspan="2">Baseline (Year 0)</th><th colspan="3">Interim Performance Targets</th><th rowspan="2">Completion criteria (Year 20)</th></tr>
<tr><th>Year 5</th><th>Year 10</th><th>Year 15</th></tr>
<tr><td colspan="6">Koala</td></tr>
<tr><td>Presence and relative density</td><td>Relative density to be determined as part of baseline surveys</td><td colspan="4">Koala presence detected in Offset Area and relative density comparable to baseline.</td></tr>
<tr><td>Habitat quality score</td><td>7.34 (7)</td><td>7.38-7.42 (7)</td><td>7.43-7.47 (7)</td><td>7.48-7.52 (7-8)</td><td>7.56-7.63 (8)</td></tr>
</table>

Table 7 (extract above) includes interim targets and completion criteria for the offset area and, according to the above extract, will continue to be an acceptable offset if Koala remain undetected. The offset site and the OMP are therefore not suitable for Koala.

</td><td>BMA acknowledge that there have been no records of Koala within the Offset Area hence the inclusion of an interim performance target, stating that Koala presence must be detected by year 5 at the offset site. Additional clarification on the corrective actions that will be implemented should presence not be identified has been inserted to Table 9 of the OMP for completeness (Appendix F of the PD).</td></tr>
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<u>Little/no conservation benefit</u>

The OMP provides little/no benefit to the protected matters because it does not:

a) increase species presence/usage of the site. Careful review of the tables at Appendix B of the OMP shows that stocking rate scores for Koala and Greater Glider at baseline and offset completion are all 2.86/4 (tables at Attachment); or

</td><td>Noted. The tables provided for the offset area (baseline) contain a species stocking rate of 2.86/4. This stocking rate has been based on the wider Offset Investigation Area as a conservative approach. It is noted that Year 0 surveys will be undertaken within the Offset Area to</td></tr>
</table>

Submitter Number	Submission	BMA response to submissions
	b) improve habitat quality that enhances the viability of these species. Table D2, Appendix D proposes to increase: - <u>site condition for Koala and Greater Glider</u> by increased native species richness in the ground and shrub layer, shrub cover, cover of native grasses in the ground layer, hollow abundance, a marginal increase in species recruitment of the Ecological Dominant Layer and reduced non-native cover. Improvements to site condition, such as above, or controlling low densities of key weeds (e.g. lantana) provide little/no material direct benefit to the (absent) Koala. Increased hollow abundance will benefit the Greater Glider if that results in increased stocking rate – which BMA has not committed to achieve. - <u>site context for Koala</u> by weed management and wild dog control. This double counts benefits from increasing native species richness in the ground and shrub layer and provides no benefit to a species absent from the offset. I suggest it is inappropriate to double count benefits from site condition improvements that also reduce threats, underestimating offset obligations. The benefits of wild dog control should be evidenced through increased stocking rate – which BMA has not committed to achieve. - <u>site context for Greater Glider</u> by removal of top wire of barbed wire fences. This is despite no evidence of Greater Glider entangled at the site, or a risk-based assessment of Greater Glider presence and abundance, and launching trees at or immediately adjacent to the offset site, relative to barbed wire. There are no site details, and subsequent benefits analysis – making this benefit almost certainly exaggerated. Adopting a precautionary approach to the above means that, though aligned with recovery plans etc, the offset outcomes offer little/no benefit to the species unless backed by site specific information, such as threats and risks and species presence and abundance, and a commitment to attain, monitor and demonstrate a statistically significant increase in species stocking rate.	establish the baseline of species presence, per Table 7 of the OMP (Appendix F). The information, assessment and process to identify improvement in habitat quality has been completed in accordance with the Offsets Policy, OAG, and relevant DCCEEW conservation advice documents. Please refer to at minimum Section 1.2 *Offset Conditions*, Section 3.2 *Management Objectives*, Section 2.4 *Threats*, Section 3.3 *Management Actions*, Appendix C – *Offset Assessment Guide Output*, and Appendix D – *Offset Area Habitat Quality Modelling* of the OMP for the specific linkages.
	<u>Inflated habitat quality improvement</u>	Noted. BMA have completed offset calculations and modelling in accordance with the Offsets Policy and the OAG. Please refer to Appendix C – *Offset*

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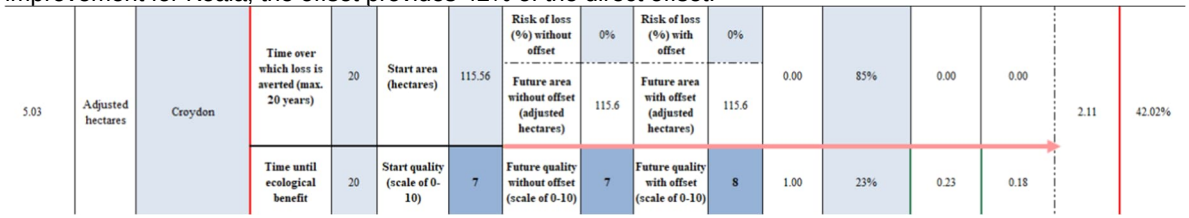
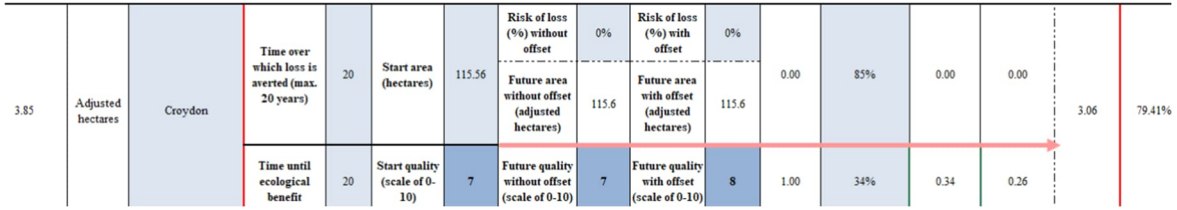
	The habitat quality improvements for Koala and Greater Glider are inflated by start quality and 'rounding' practice in order to use the offsets assessment guide. Table D1 at Appendix D (Attachment) shows that habitat quality for: - Koala will improve from 7.34/10 to 7.63/10, where the 0.29/10 improvement is rounded to one integer improvement, and a 30% discount on offset; and - Greater Glider will improve from 7.17/10 to 7.54/10, therefore 0.42/10 improvement is also rounded to one integer improvement, and a 60% discount on offset Each of the above enables BMA to 'round down' the start quality to 7/10, and 'round up' future quality to 8/10, providing BMA a perverse, anti-precautionary discount on its offset obligations. On the information provided, and a combined 23% confidence (0.8 x 0.29) achieving 1/10 habitat quality improvement for Koala, the offset provides 42% of the direct offset.  On the information provided, and a combined 34% confidence (0.8 x 0.42) achieving 1/10 habitat quality improvement for the Greater Glider, the offset provides 79% of the direct offset.  	*Assessment Guide Output*, and Appendix D – *Offset Area Habitat Quality Modelling* of the OMP for detailed discussion and evidence.

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	Given BMA's subjective and unsubstantiated 'modelling', the tenuous species-specific benefits (discussed above), the perverse 'rounding' outcomes, and that offset decision-making requires a precautionary approach, BMA should adopt at least one of the following options: - provide an alternate offset site with precautionary, site-specific, scientifically robust and species-specific outcomes; - commit to attaining, detecting and reporting short (and then longer) term increase in species Koala and Greater Glider presence/usage of the offset site; and/or - increase habitat quality improvements for species-specific outcomes that, at a minimum, attain no less than an absolute increase of 1/10 'difference from start quality (i.e. achieve 8.34/10 for Koala, 8.12/10 for Greater Glider). I suggest BMA's use of the term 'modelled' may be misleading to the reader. 'Modelled' suggests BMA used a system or procedure to predict or calculate the offset outcomes. On information provided in the PD and OMP, the modelled outcome is more likely speculation and/or opinion.	
	Reporting period, duration of impact Related to Policy Principle 2, the Policy states: *'Offsets should compensate for an impact for the full duration of the impact' and '… as a result of offsetting will instead be protected in an enduring way and actively managed to maintain or improve the viability of the protected matter. In these cases, the tenure of the offset should be secured for at least the same duration as the impact on the protected matter arising from the action, not necessarily the action itself.'* As the offset entirely relates to attaining and maintaining habitat quality improvement, it follows that maintenance of future quality with offset should be reported for the period of effect of the approval and not be limited to the period of the offset management plan.	Noted. The OMP details reporting requirements that are aligned with the Offset Policy, particularly sections 4.2 and 7.2.1 of the Offsets Policy. Refer to Section 6 *Reporting* of the OMP for specific reporting requirements, and Section 3.3.1 *Offset Security* for details on the commitment to securing the offset site legally.
	Enduring outcomes and protection The OMP states:	The offset outcomes and protection within the OMP have been developed in accordance with the Offsets Policy and in consultation with DCCEEW. Refer to

Submitter Number	Submission	BMA response to submissions
	Securement of the Offset Area as Category A area using a Voluntary Declaration (VDec) … , as well as via a covenant pursuant to the Land Act 1994, will … protect the Offset Area from: - *future changes in legislation which could result in reduced protection; and* - *future clearing, including clearing of the currently-mapped Category B regulated vegetation that could potentially be undertaken as Exempt Clearing Work or under future approval.* I am concerned the above does not commit BMA to enduring offset outcomes and protection. This is because it does not: - commit to protecting the future habitat quality from, for example, excessive grazing pressure, reinstatement of barbed wire and reduced pest and weed invasion post the period of the OMP; and - explain Land Act processes and obligations that apply to landowners/managers to prevent clearing and Koala and Greater Glider habitat quality decline post the period of the OMP.	Section 3.2.2 *Offset Area Protection Mechanism*, Table 6, and Section 3.3.1 *Offset Securement* of the OMP.
	<u>Core indicator weightings</u> I am not confident the habitat quality assessments comply with the Guide, and therefore the Policy. The quality scoring method is central to assessing the suitability of direct offset proposals which is - according to the Policy - performed by the regulator. *The Offsets assessment guide is a tool that has been developed for expert users in the department to assess the suitability of offset proposals. The guide is also available to proponents to assist with planning for future development proposals and estimating future offset requirements. (Page 4)* It follows that quality scores selected by the Department are by using a method and metrics developed by the Department in consultation with independent subject matter experts (e.g. academics, researchers) and end users. The final approved scoring method, metrics and justification should be published with justification for each protected matter, and continuously referenced when formulating offset proposals. The Guide states: *There are three components that contribute to the calculation of habitat quality: site condition, site context, and species stocking rates.* *These components contribute to the final habitat quality score … however the weighting given to each component is dependent on the ecological requirements of the impacted species or ecological*	Noted. Habitat quality assessments and weightings have been completed in accordance with MHQA Biocondition Assessment methodologies, as described within the OMP. Refer to Section 2.1.2 *Field Assessments* and Appendix B *Impact and Offset Area Baseline Habitat Quality Data* for detail.

Submitter Number	Submission	BMA response to submissions
	community. For example, for some species the most important consideration is the location of a site in the landscape, whereas for others the presence of important habitat features on the site itself may be the most important influencing factor. The Guide does not 'weight' the three components, only that each must be considered. Neither does the Guide specify that the weighting be numerical, thus it may be conceptual for differentiating between 0 and 10/10, such as at Attachment O of the EPBC Act approval for EPBC 2019/8437. As discussed above, scoring factors that relate to both condition and context should be avoided because it discounts impact site quality and exaggerates offset benefits. In the absence of approved and published EPBC policy statement/s or conservation advice containing a habitat quality scoring method, it rests with BMA to explain and/or direct the reader to the ecological basis for weighting site condition (30%), site context (30%) and species stocking rate (40%), and the parameters that comprise those indicators (Appendix A). Related to the above, I am also concerned the scoring methods score parameters that do not measure how well the impact site supports the Koala and Greater Glider and the offset site supports the ongoing viability of each species. Regarding habitat quality assessments, the Guide states: *The quality score for area of habitat or area of community is a measure of how well a particular site supports a particular threatened species or ecological community and contributes to its ongoing viability … It is important to note that the assessment of quality for threatened species habitat and ecological communities is not simply a scoring of vegetation 'pristineness'.* Superficially, the scoring method appears to comply with the above by attributing only a portion of the assessment to the relative pristineness of the habitat, i.e. scoring site condition against benchmark values for the relevant regional ecosystem. However, MHQA assessment of site condition potentially misrepresents the value of the site, overestimating the start quality and/or ecological benefit to the protected matter by scoring parameters not directly relevant to the protected matter. For example, I question the relevance of coarse woody debris, organic litter and the presence/density of non-perennial ground layer species to Koala and Greater Glider habitat quality.	
	<u>Ecological benefits are not evidenced</u>	Noted. The information, assessment and process to identify improvement in habitat quality within the OMP has been completed in accordance with the Offsets

<table>
<tr><th>Submitter Number</th><th>Submission</th><th>BMA response to submissions</th></tr>
<tr><td></td><td>The ecological benefits of the offset are that, over a 20 year period, Koala and Greater Glider will respectively improve in quality by 0.29/10 and 0.42/10. The offset area is calculated, however, on quality improvement of 1/10. The inappropriateness of that calculation is discussed above.

Table 6 and Sections 3.3.2 - 3.3.4 of the OMP outline ‘Habitat Improvement’, ‘Land Use Management’ and ‘Weed and Pest Management’ actions intended to achieve the targets and criteria in Table 7. The OMP makes only general commitments to the nature, location and timing of management actions, with detail deferred to baseline assessments and the judgement of BMA selected, suitably qualified persons.

The effectiveness of proposed grazing, weed, pest and fuel hazard controls and management to increase native species richness in the ground and shrub layer, shrub cover, cover of native grasses in the ground layer and species recruitment of the Ecological Dominant Layer, as well as reduce non-native cover is not detailed and discussed by reference to scientifically robust, site specific information attached to the plan. It is relevant that, if Greater Glider are not detected during baseline surveys, BMA does not commit to ensuring Greater Glider presence at the offset site.

<table>
<tr><th colspan="6">Greater Glider</th></tr>
<tr><td>Greater Glider occurrence</td><td>Relative density to be determined as part of baseline surveys</td><td colspan="4">Greater Glider presence detected in Offset Area and relative density comparable to baseline.</td></tr>
<tr><td>Habitat quality score – Greater Glider</td><td>7.12 (7)</td><td>7.23-7.27 (7)</td><td>7.32-7.37 (7)</td><td>7.41-7.46 (7)</td><td>7.50-7.54 (8)</td></tr>
</table>
</td><td>Policy, OAG, and relevant conservation advice documents. Refer at minimum to Section 1.3 Compliance with the EOP, Section 2.4 Threats, Section 3.1 Offset Management Framework, Section 3.3 Management Actions, Section 4 Offset Monitoring, Appendix C – Offset Assessment Guide Output, and Appendix D – Offset Area Habitat Quality Modelling within the OMP.</td></tr>
<tr><td></td><td><u>Concluding remarks</u>

On information provided in the PD and OMP, I consider the offset proposal fails to demonstrate compliance with the following Policy Principles:
- #1, Koala are not present at the offset site;
- #2, the offset outcomes may not be for the duration of the impact;
- #4, the offset area is inadequate;
- #7, lacks robust science (including site-specific information); and
- #9, does not enable decision-making that accounts for scientific uncertainty.</td><td>The OMP has been developed in accordance with the Offset Policy (refer Section 1.3 of the OMP). The OMP has been released for public viewing in accordance with DCCEEW assessment requirements.</td></tr>
</table>

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	A draft OMP should not be released for public review unless and until the offset proposal demonstrably complies with the Policy, and is approved. That this has occurred signals the Department has already agreed to BMA's claims, prejudicing the Department's reputation and the credibility of the assessment process. It would be more appropriate to, upon approval of an offset proposal that complies with the Policy's principles, release the draft OMP for public comment in accordance with the provisions of Section 134A of the EPBC Act, circulated to interested parties.	