

La Trobe University EPBC approval (2018/8343)

Annual Compliance Report: Year 3 (November 2023 to November 2024)

Final Report

Prepared for La Trobe University

12 February 2025

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Biosis staff involved in this project were:

- Sarah Hilliar (ecology)
- Sally Mitchell (mapping)
- Clare Emery (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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Declaration of Accuracy

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 (inc. ABN) _____

Date ____ / ____ / ____

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1 Introduction

1.1 Background

Biosis Pty Ltd (Biosis) was engaged by La Trobe University to undertake annual compliance monitoring in accordance with their approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) (EPBC approval 2018/8343). The requirement for the annual compliance report is prescribed under Condition 13 of the approval EPBC 2018/8343 for La Trobe University.

This report addresses each approval condition and documents compliance or otherwise for Year 3 (15 November 2023 to 14 November 2024), including implementation of the following documents:

- La Trobe University Sports Precinct Stage 3: EPBC Act Matted Flax-lily Salvage and Translocation Plan (MFLSTP) (Biosis 2020a) as specified in Condition 4c of the approval.
- La Trobe University Sports Park Precinct Stage 3 Conservation Plan (CMP) (Biosis 2020b) as specified in Condition 6 of the approval.
- La Trobe University Sports Precinct Stage 3: EPBC Act Offset Management Plan (OMP) (Biosis 2020c) as specified in Condition 2 of the approval.
 - Compliance with this document is further addressed in the La Trobe University monitoring and compliance reporting for 2023 (Biosis 2023) and 2024 (currently in preparation).

An amended set of conditions proposed by the Department of Climate Change, Energy, the Environment and Water (the Department) and finalised 15 November 2024, have also been addressed within this report. Consideration of the new conditions of approval are discussed in Section 2.2.

This report is to be published on the La Trobe University website within 60 business days of November 14, 2024. With the submission of this report, La Trobe University will be compliant with Condition 13 of the EPBC approval (2018/8343). This report has been prepared in accordance with the *Annual Compliance Report Guidelines: Reporting under the Environment Protection and Biodiversity Conservation Act 1999* (DCCEEW 2023).

1.2 Description of Activity

The approved action involved the development of the Stage 3 Sporting Precinct at the La Trobe University, Bundoora campus (study area) on a portion of land otherwise known as 906 Plenty Road, Bundoora (Figure 1). The study area is within the Victorian Volcanic Plain bioregion, the City of Darebin, and the Yarra River Basin.

Biosis conducted the initial flora and fauna assessment for the La Trobe University Sports Precinct in 2018 and identified 23 Matted Flax-lily (MFL) *Dianella amoena* individuals (Biosis 2019) (Figure 2). MFL is a matter of national environmental significance (MNES) and is listed as endangered under the EPBC Act.

The proposed works were referred to the Australian Government Minister for the Environment on 20 December 2018 (Referral 2018/8343), and approved subject to conditions on 25 February 2021. The approval and associated conditions are in effect until April 2035.

A first party offset area was established by La Trobe University to meet the quantity and quality requirements for an offset of MFL habitat in association with the approval conditions for referral EPBC 2018/8343 (Figure 3).

The offset site is managed for the protection of native vegetation and MFL habitat in accordance with the approved CMP and MFLSTP.

1.3 Previous non-compliance relating to the Conditions of EPBC 2018/8343.

In relation to the Conditions of EPBC 2018/8343, there have been cases of non-compliance that have been documented below. These breaches have been resolved and are documented here to provide context for this compliance report.

- The Department during correspondence to La Trobe University dated 7 April 2022, considered the University to have contravened Condition 8 of the approval, and issued a warning notice.
 - Concerns were also raised regarding Conditions 2 and 3.
 - La Trobe University was made aware of the compliance reporting requirements of Condition 13 of the approval.
- During an internal audit by Symal Pty Ltd it was discovered that vegetation had been cleared from outside the approved works area / action area for the La Trobe University Stage 3 Sports Precinct. The incident occurred on 20 September 2022 as part of works to build an outfall drain into Darebin Creek. The Department were notified on 21 September 2022 of the incident, in accordance with Condition 14.
 - Biosis undertook a site assessment on 26 September 2022 to determine whether suitable habitat for MFL was cleared. A letter was prepared by Biosis on 16 October 2022 to satisfy Condition 15 of the EPBC Act approval.
 - La Trobe University was consequently considered non-compliant with Condition 1b of the EPBC Act approval. Appropriate offsets were identified in the letter to compensate for the clearing of vegetation outside the approved works area. No infringement was issued.
- Condition 13 requires that the approval holder must prepare an annual compliance report for each 12-month period following the date of commencement of the action. Since commencement of the action, no compliance reports had been prepared or published. An infringement notice was presented to La Trobe University on 28 August 2024 for contravening Condition 13 of the approval.
 - A compliance report was prepared by Biosis for years 1 and 2 was prepared 17 June 2024 and was submitted to the Department to satisfy Condition 13 (Biosis 2024).

Due to the incidents of non-compliance in the first year after development activities, the department recommended the conditions of approval be varied, by direction, in accordance with Section 143(1)(a) of the Act. The amended conditions of approval were finalised 15 November 2024. Consideration of the new conditions of approval are discussed in Section 2.2.

1.4 Activities undertaken during reporting period

During the period of 15 November 2023 to 14 November 2024, the following activities have been undertaken:

- Translocation of salvaged MFL into the offset area occurred on 16 June and 4 September 2024, in accordance with the CMP and MFLSTP. Monitoring of plant condition is ongoing.
- The Department recommended the conditions of approval be varied, by direction, in accordance with Section 143(1)(a) of the Act.
 - These conditions were finalised 15 November 2024.

- Carrying out of management actions relating to the implementation of the OMP, including:
 - Weed management and pest control.
 - Maintaining fences.
 - Ecological burning.
 - Revegetation.
 - Monitoring and reporting (ecological monitoring of the offset site has taken place, and the compliance report is being prepared).
- Responding to written requests from the Department, providing compliance records, and notifications

1.5 New environmental risk

No new environmental risks have become apparent during this reporting period. Should new environmental risks be identified, a risk analysis and reporting will be undertaken, and the relevant management plans reviewed (if required).

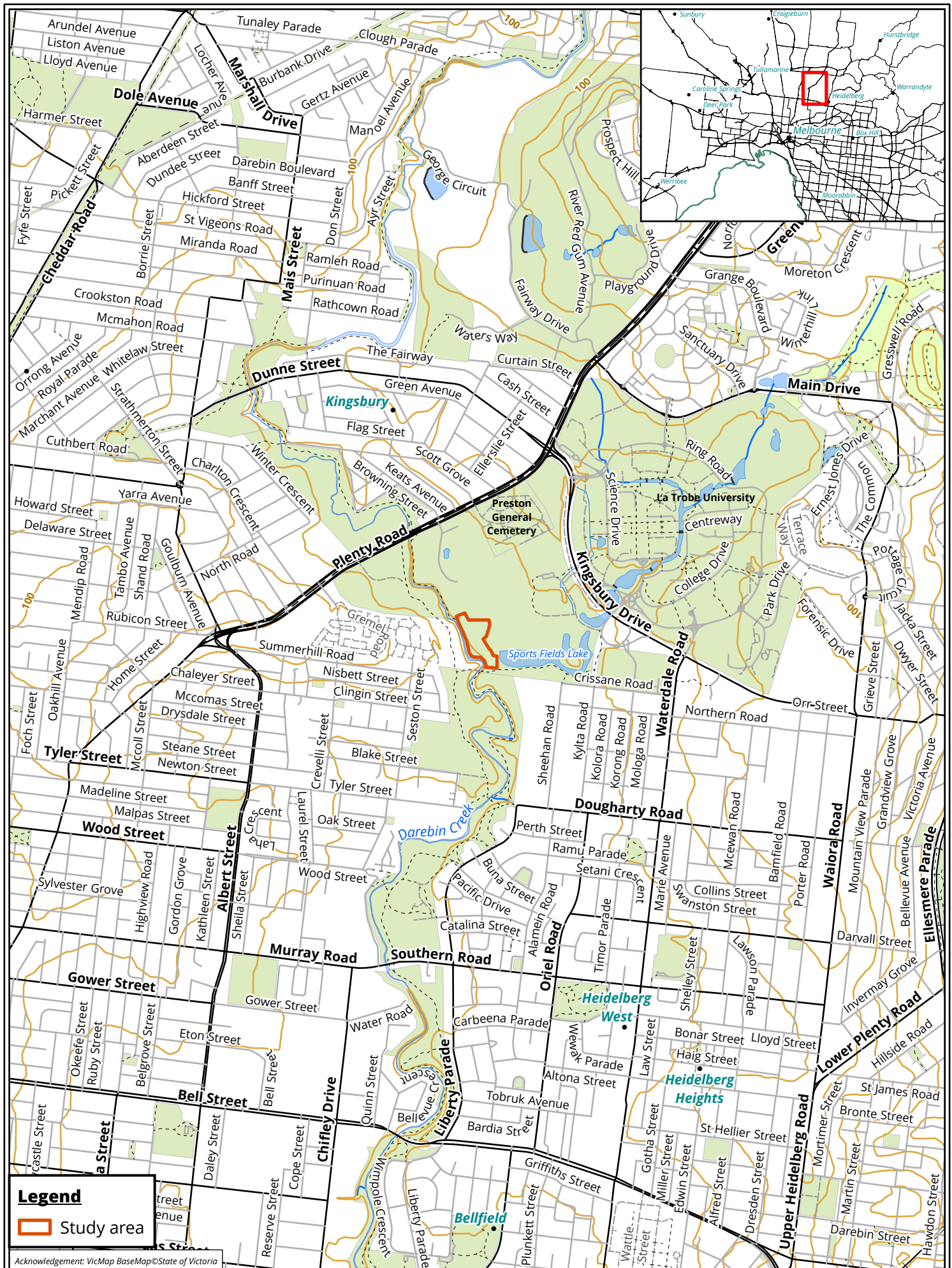
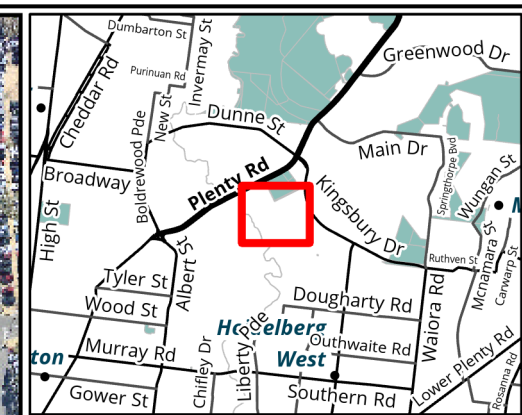
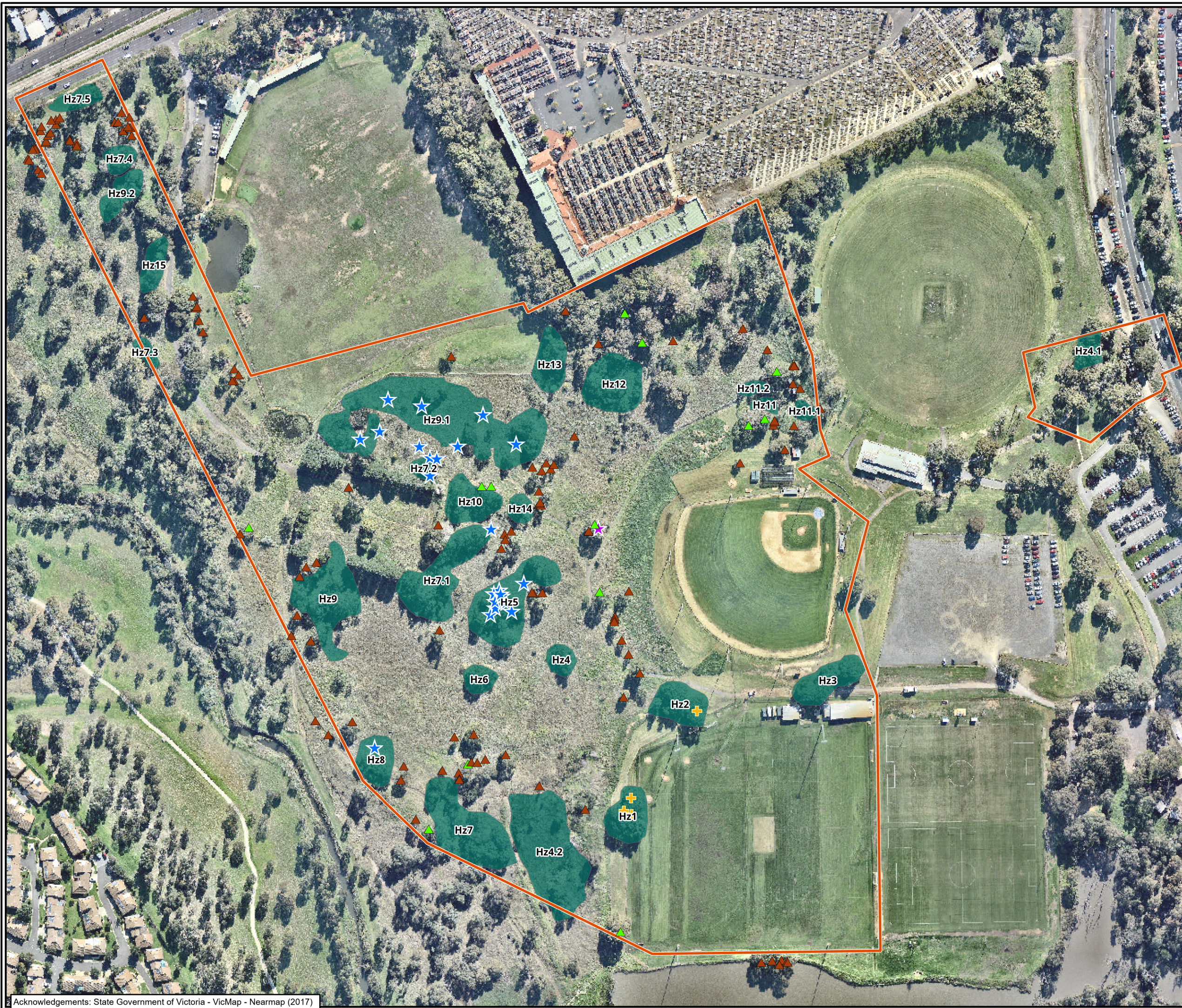


Figure 1 Location of the offset area - LaTrobe University Sports Precinct, Bundoora, Victoria



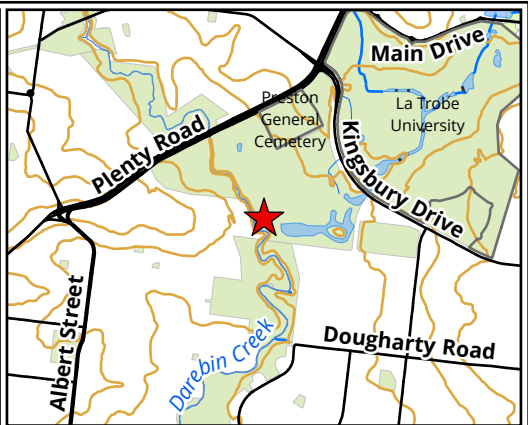
- Legend**
- Study area
- Vegetation**
- Large tree within patch
 - Matted Flax-lily within survey area (Biosis 2018)
 - Matted Flax-lily within survey area (Jacobs 2016)
- Scattered trees**
- Large
 - Small
- Ecological vegetation class**
- Plains Grassy Woodland (VVP_0055)

Figure 2: Ecological features of the study area

0 25 50 75 100 125
Metres
Scale: 1:2,500 @ A3
Coordinate System: GDA 1994 MGA Zone 55

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Biosis Pty Ltd
Albury, Ballarat, Melbourne, Newcastle,
Sydney, Wangaratta & Wollongong

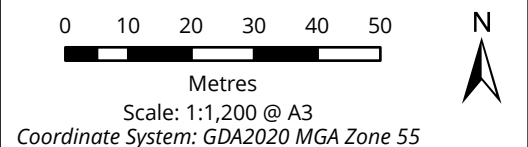
Matter: 27318,
Date: 24 June 2024,
Checked by: SH, Drawn by: LW, Last edited by: gologhlin
Location: P:\39900s\39933\Mapping\39933_LaTrobeRoadWidening.aprx



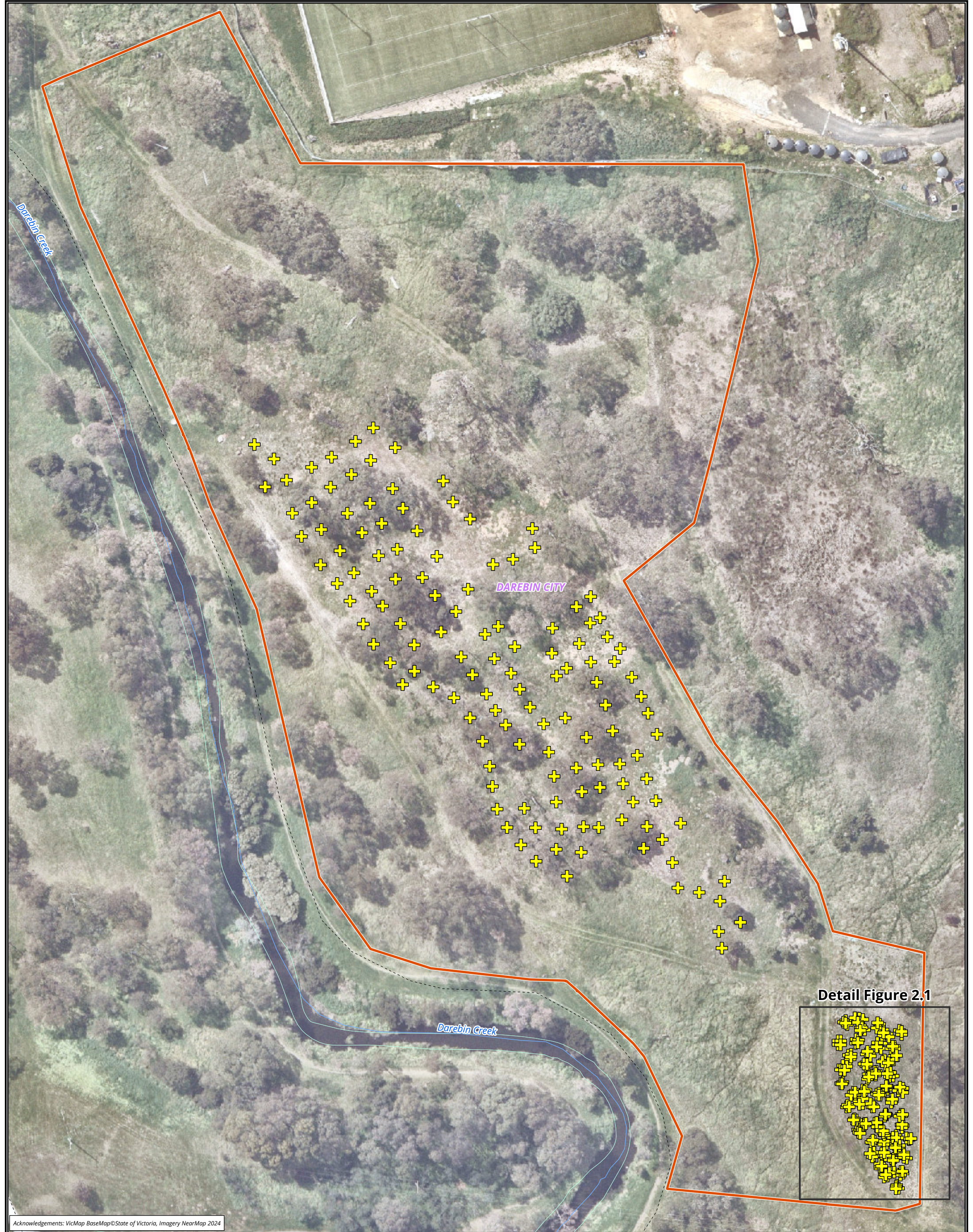
Legend

- Offset area
- Quadrat

Figure 3 Location of quadrats



Matter: 41026,
Date: 07 January 2025 ,
Prepared for: TH, Prepared by: SKM, Last edited by: smitchell
Layout: 41026_OffsetSite
Project: P:\41000s\41026\Mapping\
41026_LTU_OffsetMonitoring_2024.aprx



Acknowledgements: VicMap BaseMap©State of Victoria, Imagery NearMap 2024

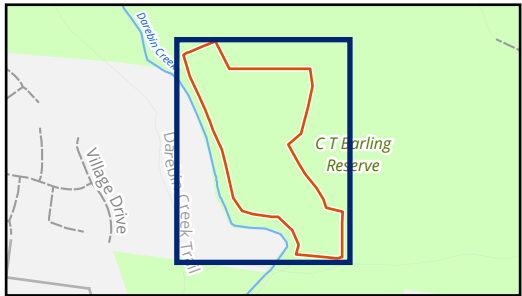


Figure 4.0 Location of translocated Mattex Flax-lillies: overview

- Legend**
- Study area
 - Matted Flax-lily (translocated)
 - Current parcel boundary

0 10 20 30 40
Metres
Scale 1:800 @ A3
Coordinate System: GDA2020 MGA Zone 55

biosis
APEM Group

Matter: 40954,
Date: 14 January 2025,
Prepared for: SAH, Prepared by: SP, Last edited by: spanter
Layout: 40954_F2_MFL_translocated
Project: P:\40900s\40954\Mapping\40954_LTU_MFL_offset_monitoring.aprx



Acknowledgements: VicMap BaseMap©State of Victoria, Imagery NearMap 2024

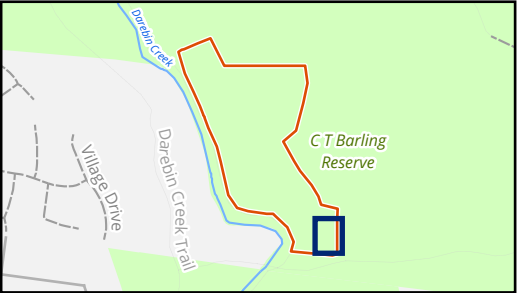


Figure 4.1 Location of translocated Mattex Flax-lillies: detail (south-east)

- Legend**
- Study area
 - Matted Flax-lily (translocated)
 - Current parcel boundary

0 2 4 6 8
Metres
Scale 1:125 @ A3
Coordinate System: GDA2020 MGA Zone 55

biosis
APEM Group

Matter: 40954,
Date: 14 January 2025,
Prepared for: SAH, Prepared by: SP, Last edited by: spanter
Layout: 40954_F2_MFL_translocated
Project: P\40900s\40954\Mapping\40954_LTU_MFL_offset_monitoring.aprx

2 Compliance with EPBC approval conditions

This chapter of the report addresses compliance with the EPBC conditions under EPBC 2018/8343 approval (section 2.1, Table 1) that were current throughout the reporting period. This chapter also provides comment on the amended conditions of approval that were finalised 15 November 2024 (section 2.2, Table 3).

2.1 Compliance with current EPBC approval conditions

This section addresses the requirement in the *Annual Compliance Report Guidelines: Reporting under the Environment Protection and Biodiversity Conservation Act 1999* (DCCEE 2023) for a compliance table. Table 1 includes the full wording of all conditions under EPBC 2018/8343 approval, the condition reference number, a designation regarding compliance (highlighted green), non-applicability (highlighted green) or non-compliance (highlighted red), a summary of evidence and comments, and references to other parts of this compliance report which relate to the approval condition. It should be noted that some conditions are ongoing (highlighted orange) and relevant until completion of the action.

All conditions of the EPBC referral have been considered and addressed.

Table 1 Assessment of compliance with EPBC approval conditions 15 November 2023 – 14 November 2024 (Year 3)

Number	Current condition of approval	Compliance Year 3	Evidence / Comments
Part A Conditions specific to the action			
1.	The approval holder must:		
	a. not clear more than 23 Matted Flax-lily plants within the action area	Compliant	Refer to section 2.1.1 for discussion on this condition.
	b. not clear Matted Flax-lily habitat outside the action area.	Compliant	No MFL habitat was cleared outside the action area within the current reporting period.
2.	The approval holder must secure the offset area and commence implementing the Offset management plan for the offset area prior to undertaking any clearing.	Compliant	<p>The offset area is secured in-perpetuity via a covenant in accordance with Section 3A <i>Victorian Conservation Trust Act 1972</i>. A Covenant with Trust for Nature has been secured and registered and was finalised on 10 May 2023.</p> <p>Implementation of the Offset Management Plan is monitored through the OMP compliance reports for 2023 (Biosis 2023) and 2024 (currently in preparation). Refer to section 2.1.2 for further discussion.</p> <p>The amended conditions for the approval include a requirement for a revised OMP. This is in preparation and discussed further in section 2.2 of this report.</p>
3.	Within 10 business days of the offset area being secured, the approval holder must provide the department with:		
	a. written evidence demonstrating that the offset area has been secured; and	Compliant	An email was sent to PostApproval@environment.gov.au on 7 March 2022 from Antony Inglis at La Trobe University, which notified the Department that the offset area had been physically secured. The process to have the offset site secured via a covenant begun on 5 January 2022 and was finalised on 10 May 2023.
	b. shapefiles and the offset attributes of the offset area.	Compliant	Shapefiles and the offset attributes were provided in Year 1.
4.	To compensate for the removal of up to 23 Matted Flax-lily plants from within the action area:		
	a. Prior to any clearance, the approval holder must undertake a pre-clearance survey to determine the number and locations of Matted Flax-lily plants within the action area.	Compliant	The pre-clearance survey was undertaken in Year 1 prior to the clearance works. The letter produced on 10 October 2021 stated that one MFL individual appeared to have been salvaged prior to the survey, but that the other 22 expected MFL plants remained. The survey also identified an additional 26 MFL plants in the action area.
	b. The approval holder must salvage and translocate all Matted Flax-lily plants identified by the pre-clearance survey.	Compliant	Identified MFL have been translocated and monitoring of their condition is ongoing. As per email correspondence on 7 March 2022 from Antony Inglis at La Trobe University to the Department, the salvaged plants were being held and propagated at their nursery. All salvaged plants had survived the translocation. Email correspondence from Antony Inglis on 31 May 2024 to the Department indicated that the salvaged MFL plants had been propagated into approximately 2,000 individuals. The plants were translocated to the offset site on 16 June and 4 September 2024.
	c. The approval holder must commence implementing the Salvage and translocation plan prior to undertaking any clearing.	Compliant	The MFLSTP (Biosis 2020a) has been implemented. The MFL in the action area were salvaged in 2021 and propagated at La Trobe University's nursery before they were translocated into the offset area on 16 June and 4 September 2024.
5.	The approval holder must ensure that a minimum of 63 salvaged Matted Flax-lily plants have survived at the offset area at least 5 years after the date the last Matted-Flax Lily plant is translocated to the offset area. The approval holder must ensure that the location of each translocated Matted Flax-lily plant is recorded in the Atlas of Living Australia and the Victorian Biodiversity Atlas within 6 months of being translocated.	Ongoing	<p>Translocation of MFL individuals has taken place and monitoring is ongoing as per the approved OMP. This will be recorded in the Year 4 OMP monitoring report, and subsequent monitoring reports.</p> <p>Translocation of MFL was completed on 4 September 2024. To be compliant with this Condition La Trobe University must ensure that a minimum of 63 salvaged MFL survive until 4 September 2029. However, this Condition has been amended to reflect the increased number of salvaged plants. Refer to section 2.2 for details.</p> <p>All translocated MFLs have been georeferenced using a DGPS and is indicated in Figure 4. Biosis will upload this information to the ALA and VBA within the specified timeframe. Translocation of MFL was completed on 4 September 2024 and therefore the georeferenced data must be uploaded by 4 March 2025.</p>
6.	The approval holder must implement the Conservation management plan.	Ongoing	The Conservation Management Plan has been implemented and construction is completed for the proposed action. Remediation measures including site clean up have commenced. All management objectives in this document are being followed.

Number	Current condition of approval	Compliance Year 3	Evidence / Comments
			Email correspondence on 4 June 2024 from the Department and a consequent letter administered on 10 June 2024 outlined a concern that Condition 6 had been breached due to the salvage of 50 MFL plants. Further discussion is provided in Section 2.1.3.
Part B Standard administrative conditions			
7.	Notification of date of commencement of action The approval holder must notify the department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Non-Compliant	<p>The commencement of the action occurred on 15 November 2021. La Trobe University notified the department on 7 March 2022 and was made aware that that this notification was outside of the 10 business days following the commencement of action. The department provided a letter to La Trobe University on 7 April 2022 to confirm that the contravention of condition 7 has been substantiated.</p> <p>There have been no further developments on this condition since Year 1.</p>
8.	Notification of date of commencement of action The approval holder must notify the department in writing of the date the last Matted-Flax Lily plant is translocated to the offset area within 10 business days after the date the last Matted-Flax Lily plant is translocated to the offset area.	Compliant	La Trobe University informed the department on following 16 June and 4 September translocation dates, that the translocations of MFL had occurred.
9.	Compliance records The approval holder must maintain accurate and complete compliance records.	Compliant	The approval holder continues to maintain compliance records.
10.	Compliance records 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. Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the department's website or through the general media.	Compliant	<p>A show cause letter was issued to La Trobe University on 10 June 2024 in response to the potential breaches in the approved conditions 1, 6, 13 and 14. La Trobe University were required to respond by 25 June 2024, which they adhered to.</p> <p>Further information is provided in section 2.1.4.</p> <p>The Department issued a covering letter, infringement notice and invoice, and a table comparing the current conditions of approval with drafted varied conditions on 28 August 2024. The Department sought comments on the draft varied conditions, which would then be discussed further internally. Further consultation with La Trobe University would follow this. The requested timeframe for comments was by 11 September 2024.</p> <p>La Trobe requested an extension to the 11 September deadline, which was granted for one week. Comments were provided prior to this date.</p> <p>The amended conditions were finalised on 15 November 2024.</p>
11.	Submission and publication of plans The approval holder must:		
	a. submit plans electronically to the department;	Compliant	All plans have been electronically submitted to the department.
	b. unless otherwise agreed to in writing by the minister, publish each plan on the website within 20 business days of the date: <ul style="list-style-type: none"> i. of this approval, if the version of the plan to be implemented is specified in these conditions; or ii. the plan is approved by the minister in writing, if the plan requires the approval of the minister; 	Compliant	All plans have been published on the website within 20 days of the approval date (see https://www.latrobe.edu.au/future-city/about/nangak-tamboree).
	c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and	Compliant	All sensitive ecological data from plans has been redacted from the plans.
	d. keep plans published on the website until the end date of this approval.	Compliant	Plans remain on the website (see https://www.latrobe.edu.au/future-city/about/nangak-tamboree).
12.	Submission and publication of plans The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan, is prepared in accordance with the department's <i>Guidelines for biological survey and mapped data</i> (2018) and submitted electronically to the department in accordance with the requirements of the plans.	Compliant	All spatial data has been prepared in accordance with the department's <i>Guidelines for biological survey and mapped data</i> (2018) and submitted with the requirements of the plans.
13.	Annual compliance reporting The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in	Non-Compliant	There was previous non-compliance with this condition that occurred in Year 1 and 2 but was resolved in 2024 as the compliance reports were produced. The resolution was an infringement notice presented to La Trobe University on 28 August 2024 for contravening Condition 13 of the

Number	Current condition of approval	Compliance Year 3	Evidence / Comments
	<p>accordance with an annual date that has been agreed to in writing by the minister. The approval holder must:</p> <ol style="list-style-type: none"> publish each compliance report on the website within 60 business days following the relevant 12 month period; notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication; keep all compliance reports publicly available on the website until this approval expires; exclude or redact sensitive ecological data from compliance reports published on the website; and where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication. <p>Note: Compliance reports may be published on the Department's website</p>		<p>approval. The compliance report for Year 1 and 2 was not originally published on their website, however this has since been rectified. This is discussed further in section 2.1.5.</p> <p>This compliance report addresses this condition and covers the period from 15 November 2023 to 14 November 2024.</p>
14.	<p>Reporting non-compliance</p> <p>The approval holder must notify the department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify:</p> <ol style="list-style-type: none"> any condition which is or may be in breach; a short description of the incident and/or non-compliance; and the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available 	Not applicable	<p>Email correspondence on 4 June 2024 from the Department and a consequent letter administered on 10 June 2024 outlined a concern that Condition 14 had been breached as the department was not notified of the breach in Conditions 1 and 13. This was addressed in the compliance report for Year 1 and 2 (Biosis 2024) and is discussed further in section 2.1.5 of this report. It was also a concern that Condition 6 had been breached due to the salvage of 50 MFL plants. Further discussion is provided in section 2.1.3.</p> <p>It is considered that compliance with this approved condition is not applicable as there has been no further incidents of non-compliance since the breach of Conditions 1, 6, 13 and 14, which have been addressed.</p>
15.	<p>Reporting non-compliance</p> <p>The approval holder must provide to the department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <ol style="list-style-type: none"> any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; the potential impacts of the incident or non-compliance; and the method and timing of any remedial action that will be undertaken by the approval holder. 	Not applicable	<p>La Trobe University provided DCCEEW with details on the breach of Condition 13 by 25 June 2024, which was within the timeframe of 10 business days from the issue of the show cause letter.</p> <p>No further incidents or non-compliance with the approved conditions have occurred in this reporting period.</p>
16.	<p>Independent audit</p> <p>The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the minister.</p>	Not applicable	No independent audits were requested by the minister in Year 3.
17.	<p>Independent audit</p> <p>For each independent audit, the approval holder must:</p> <ol style="list-style-type: none"> provide the name and qualifications of the independent auditor and the draft audit criteria to the department; only commence the independent audit once the audit criteria have been approved in writing by the department; and submit an audit report to the department within the timeframe specified in the approved audit criteria 	Not applicable	No independent audits were requested by the minister in Year 3.
18.	<p>Independent audit</p>	Not applicable	No independent audits were requested by the minister in Year 3.

Number	Current condition of approval	Compliance Year 3	Evidence / Comments
	The approval holder must publish the audit report on the website within 10 business days of receiving the department's approval of the audit report and keep the audit report published on the website until the end date of this approval.		
19.	Completion of the action Within 20 business days after the completion of the action, the approval holder must notify the department in writing and provide completion data.	Not applicable	There have been no further developments on this condition since Year 1.

2.1.1 Condition 1a

The approval holder must not clear more than 23 Matted Flax-lily plants within the action area.

Email correspondence to EPBC monitoring on 31 May 2024 indicated that approximately 50 MFL plants had been salvaged. Plants were salvaged in 2021, however the Department were made aware of this activity in 2024. This activity had the potential to be in breach of Condition 1a as no more than 23 plants should have been cleared.

The approval holder contested that they were not in breach of Condition 1 as they were adhering to Condition 4. The additional plants that were removed beyond the 22 pre-approved plants were first identified during the specified pre-clearance survey in accordance with Condition 4a), and the plants were salvaged and translocated in accordance with Condition 4b).

La Trobe University provided GPS coordinates of all the MFL plants removed, and the GIS shapefiles of both the action area shown at Appendix 1 of the approval and the actual area cleared/disturbed to construct the sports precinct on 25 June 2024.

La Trobe University prepared a letter on 31 July 2024 to support the claim that they were adhering to Condition 4. It should be considered that the increased number of MFL salvaged is a direct result of the pre-clearance survey, and the offset site will be achieving the desired result regardless of the number of salvaged individuals.

No infringement for Condition 1a has been administered, and it is therefore considered that the approval holder was compliant. The approved conditions 1a, 4 and 5 have been amended to reflect the increased number of MFL salvaged. See Section 2.2 for further details.

2.1.2 Condition 2

The approval holder must secure the offset area and commence implementing the Offset management plan for the offset area prior to undertaking any clearing.

La Trobe University is responsible for the implementation of the OMP and the management of the offset site in perpetuity via a covenant. Management responsibilities are detailed in the OMP and include:

- Implementing the OMP.
- Ensuring all staff and contractors comply with all OMP requirements.
- Ensuring preparation of ongoing management audit/review.
- Ensuring preparation of annual management objectives for the next year including targets and standards.
- Appointing of consultant ecologist and specialist bushland management contractor to implement management of the site.
- Reporting to Trust for Nature (TfN) and DCCEEW as required.

La Trobe University satisfactorily complied with most objectives of the OMP during the 2023 reporting year. Most specified management actions for the year were completed in accordance with the OMP, except where they were considered not relevant at that point in time or where environmental conditions prevented them from occurring (i.e. assessing success / health of revegetation) (Biosis 2023). It was noted that some progress

is needed towards meeting certain management objectives and targets over the coming years. Particular attention needs to be given to ensuring that vegetation quality and weed control targets are met.

La Trobe University satisfactorily complied with 24 of the 31 OMP requirements and were partially compliant with three of the requirements during the 2024 reporting year. Management items that were assessed as compliant included:

- Long term protection
- Annual works program
- Fencing, information and access control\
- Weed monitoring
- Pest animals
- Biomass/ organic litter
- Baseline site condition monitoring
- Monitoring of woodland, MFL, and revegetation
- Reporting

Particular attention will need to be given to ensuring that vegetation quality and weed control targets are met, as currently total weed cover is above the target cover levels, and biomass levels are below the target percentage.

More information will be available as the Year 4 OMP monitoring report is finalised.

2.1.3 Condition 6

The approval holder must implement the Conservation management plan.

Email correspondence on 4 June 2024 from the Department and a consequent letter administered on 10 June 2024 outlined a concern that Condition 6 had been breached. It was raised that the salvage of 50 MFL plants was not in line with the document *La Trobe University Sports Precinct Stage 3: Conservation Management Plan* (Appendix 6 of the preliminary documentation).

To assist the Department with their enquiries, La Trobe University confirmed on 25 June 2024 that the current and operational version of the Conservation Management Plan (CMP) to be the version dated 15 July 2020. La Trobe University further stated that all salvaged MFLs had undergone treatment that is in line with the MFLSTP. Weed control and site preparation had occurred within the offset area, and the CMP and MFLSTP had been followed and the intention made clear that “the plans will be adhered to for translocation of the MFLs into the offset site”.

The translocation of MFL into the offset area occurred on 16 June and 4 September 2024.

La Trobe University was asked to demonstrate that the ‘no go’ areas were in place prior to commencement of vegetation removal (in accordance with the CMP), and that the one reported individual MFL plant, located ‘just outside the impact area’, was not disturbed. To respond, La Trobe University confirmed that the exclusion fence was installed in October 2021 and that the MFL outside of the action area was not disturbed. Harvesting of MFL was completed 12 November 2021 and vegetation removal within the action area commenced 15 November 2021.

It is considered that the approval holder is compliant with Condition 6.

2.1.4 Condition 10

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.

The following written request in Table 2 have been made by the Department with responses provided in the timeframe specified in the requests. No further requests have been received from the Department.

Table 2 Responses to written DCCEEW requests

Request	Response
<p>Show cause letter dated 10 June 2024 requesting a response by email to anthony.evans2@dcceew.gov.au and epbcmonitoring@dcceew.gov.au by 25 June 2024. The letter requested:</p>	<p>Email response provided to the Department on 25 June 2024 by Antony Inglis.</p>
<ul style="list-style-type: none"> In relation to Condition 1: <i>please provide GPS coordinates of all Matted Flax-lily plants removed, as well as GIS shapefiles of both the action area shown at Appendix 1 of the approval and the actual area cleared/disturbed to construct the sports precinct.</i> 	<p>GPS coordinates provided in an excel spreadsheet and shapefiles provided to the Department on 25 June 2024.</p>
<ul style="list-style-type: none"> In relation to Condition 6: <i>please confirm the current and operational version of the Conservation Management Plan (CMP) is the version dated 15 July 2020?</i> 	<p>The current and operating version of the CMP has the cover date of 15 July 2020 and is version "Final version 02" dated 17/09/2021 in the document control table on page i. This information was provided to the Department on 25 June 2024.</p>
<ul style="list-style-type: none"> In relation to the possibility of encountering additional MFL plants as described in the CMP: <ul style="list-style-type: none"> <i>Please demonstrate that all MFL removed to construct the sports precinct have been 'subject to all relevant propagation, translocation and management activities in line with this CMP and the MFLSTP'; and</i> <i>'no-go' areas were in place prior to commencement of vegetation removal, and that the one reported individual MFL plant, located 'just outside the impact area', was not disturbed.</i> 	<p>A written response demonstrating compliance with the CMP and the invoice to the fencing contractor confirming completion of works was provided on 25 June 2024.</p>
<ul style="list-style-type: none"> In relation to Condition 13: <i>please submit evidence of compliance reports for each 12 month period following the date of commencement of the action (15 November 2021):</i> <ul style="list-style-type: none"> <i>being published on La Trobe University's website within 60 business days following the relevant 12 month period;</i> <i>notification to the department of the above within 5 business days of the date of publication;</i> <i>that the requirements of Conditions 13(c) to 13(e) are addressed; and</i> 	<p>The compliance report for November 2021 – November 2023 (Year 1 and 2) was submitted to the Department on 25 June 2024 and is published on the La Trobe University website at https://www.latrobe.edu.au/sustainability/protecting-biodiversity.</p>

Request	Response
<ul style="list-style-type: none"> – <i>that the reports meet the requirements of a compliance report according to the definition of compliance reports attached to the approval.</i> 	

2.1.5 Condition 13

The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the minister. The approval holder must:

- publish each compliance report on the website within 60 business days following the relevant 12 month period;*
- notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication;*
- keep all compliance reports publicly available on the website until this approval expires;*
- exclude or redact sensitive ecological data from compliance reports published on the website; and*
- where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication.*

Email correspondence on 4 June 2024 from the Department and a consequent letter administered on 10 June 2024 outlined a concern that Condition 13 had been breached. La Trobe University was in breach of this Condition as a Compliance Report for years 1 and 2 has not been prepared. In response to this a backdated Compliance Report for Years 1 and 2 was prepared on 25 June 2024 (Biosis 2024) and presented to the Department by Antony Inglis at La Trobe University. This was done to correct the incident of non-compliance.

Nevertheless, an infringement notice for the breach of this condition was issued on 28 August 2024. The infringement was for the reporting period of Year 1 and 2 after the commencement of activities.

The compliance report for Year 1 and 2 was not published on their website, however this has since been rectified (see <https://www.latrobe.edu.au/sustainability/protecting-biodiversity>).

This report outlines compliance for Year 3 (November 15 2023 to November 14 2024) against all conditions outlined in the La Trobe University EPBC Act conditions and will be published on the La Trobe University website within 60 business days of November 14 2024. With the submission of this report, La Trobe University will be compliant with Condition 13 of the EPBC approval (2018/8343) for this reporting period.

2.1.6 Condition 14

The approval holder must notify the department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify:

- any condition which is or may be in breach;*
- a short description of the incident and/or non-compliance; and*
- the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.*

Email correspondence on 4 June 2024 from the Department and a consequent letter administered on 10 June 2024 outlined a concern that Condition 14 had been breached. Condition 14 pertains to reporting non-compliance, and as it was considered that Conditions 1 (exceedance of limits for clearing MFL plants) and 13 (publication and notification of compliance reports) were likely breached, it was considered that Condition 14 was also breached as this non-compliance was not reported to the Department.

La Trobe University responded on 25 June 2024 and stated that the removal of additional MFLs was in line with the Conservation Management Plan, which is to be implemented as per condition 6 of the EPBC conditions. In addressing Condition 13 it was confirmed that there has been an administrative non-compliance of the publication of compliance reports, which was an oversight and had since been addressed.

No infringement notice for Condition 14 has been administered. The cover letter pertaining to the breach of Condition 13 dated 28 August 2024 served as a warning notice for, and finalised the compliance matters relating to, Condition 14.

2.1.7 Assessment of Compliance

Despite the breaches of EPBC Conditions that were acknowledged during this reporting period, it is noted that most infringements were addressed in the previous reporting period. La Trobe University is non-compliant with Condition 13 for the previous reporting period as the Compliance report was not published to their website within 60 business days. This has since been rectified.

Not including the ongoing actions or conditions that were not applicable, the operations of 15 November 2023 to 14 November 2024 were compliant with the current EPBC conditions of approval, as supported by the evidence provided in Table 1.

Compliance with the amended conditions is discussed below.

2.2 Varied conditions of approval

Due to the incidents of non-compliance pertaining to condition 1 and 13 in the first year after development activities, the department stated that they would be recommending the conditions of approval be varied, by direction, in accordance with Section 143(1)(a) of the Act. The amended conditions have been finalised and comments relating to compliance into the future have been provided in Table 3.

Table 3 Response to proposed varied condition of approval

Number	Current condition of approval	Proposed varied condition of approval	Notes on Compliance	Compliance Year 3
Part A – Conditions specific to the Action				
1.	The approval holder must:	The approval holder must not clear:		Compliant
	a. not clear more than 23 Matted Flax-lily plants within the action area	a. more than 70 Matted Flax-lily plants within the action area	As per the pre-clearance survey letter written by Biosis on 10 October 2021, 48 MFLs were removed from the action area for translocation. One additional MFL could not be located. It is assumed this individual had already been removed before the pre-clearance survey occurred. In the period Nov 23- Nov 24, no MFL individuals were cleared from within the action area.	
	b. not clear Matted Flax-lily habitat outside the action area.	b. Matted Flax-lily habitat outside the action area.	No further MFL habitat outside the action area will be cleared.	
2.	The approval holder must secure the offset area and commence implementing the Offset management plan for the offset area prior to undertaking any clearing.	No change	Addressed in Table 1.	Compliant
A)		By 1 February 2025, the approval holder must submit a revised version of the Offset management plan to the department for the Minister’s approval.	Updated draft OMP was provided to DCCEEW on 3 rd February 2025 (by agreement as deadline fell on a weekend day).	Ongoing
B)		A revised Offset management plan submitted for the Minister’s approval must:		
		a. be prepared by a suitably qualified ecologist;	The OMP was prepared by a suitably qualified ecologist.	Ongoing
		b. be consistent with the previous version of Offset management plan, unless otherwise necessary to ensure compliance with the conditions of this approval;	Consistent with the previous OMP.	Ongoing
		c. define self-sustaining as relevant to the salvaged Matted Flax-lily plants in the offset area, and detail criteria for determining if a Matted Flax-lily plant is self-sustaining;	As per the MFL translocation plan, a single clone is considered established if still alive after five years. The OMP reflects these self-sustaining timelines as outlined in the translocation plan.	Ongoing
		d. detail measurable completion criteria to be achieved and maintained for the duration of this approval, that: i. are specific to the offset area and derived from improving habitat quality for Matted Flax-lily at the offset area; and ii. will be achieved by 25 February 2031, and subsequently maintained or improved at least until the expiry of this approval;	The OMP details targets to improve habitat quality for MFL within the offset area, however some of the current targets are unachievable (i.e. Chilean Needle Grass, cover to less than 1% and <i>Phalarais aquatica</i> to less than 1%). The OMP has been updated to provide more achievable weed cover targets by 2031.	Ongoing
		e. measurable interim performance targets, derived from the completion criteria, that will be achieved to demonstrate the likely achievement of the completion criteria;	The OMP has been updated with a detailed timeline on when and how to reduce weed cover.	Ongoing
		f. detail the management measures, including the timeframes and circumstances for implementing those measures, that will be implemented to:	La Trobe University has a large insurance population of MFLs, that will be monitored as per the MFLSTP. This insurance population will be used to replace plants that do not survive in order to achieve the target number of MFL in the offset area.	Ongoing

Number	Current condition of approval	Proposed varied condition of approval	Notes on Compliance	Compliance Year 3
		<ul style="list-style-type: none"> i. achieve and maintain the interim performance targets and completion criteria; and ii. maintain at least 189 Matted Flax-lily plants within the offset area; 		
		<ul style="list-style-type: none"> g. detail monitoring measures, including the timeframes and circumstances for implementing those measures, that will: <ul style="list-style-type: none"> i. detect changes in habitat quality from the baseline assessment; ii. demonstrate progress against achieving the interim performance targets and completion criteria; iii. demonstrate compliance with condition 5A of this approval at regular intervals until the expiry of this approval; and iv. demonstrate the maintenance of the completion criteria, once achieved, at least until the expiry of this approval; 	The OMP details monitoring measures with the following timeframes and circumstances: <ul style="list-style-type: none"> i. Undertaken annually. ii. Undertaken annually. iii. The number of MFL plants maintained in the offset area, which are self-sustaining as defined in the OMP, will be documented annually to demonstrate compliance. iv. This information will be included in the annual vegetation monitoring report. 	Ongoing
		<ul style="list-style-type: none"> h. detail corrective measures, including timeframes for the implementation of those measures, that will be implemented in the event interim performance targets are not achieved, to ensure the subsequent interim performance target or completion criterion will be achieved; 	This information is included in the annual vegetation monitoring report.	Ongoing
		<ul style="list-style-type: none"> i. include a risk management strategy that includes: <ul style="list-style-type: none"> i. an assessment of the events or circumstances (risk event(s)) that may prejudice the successful implementation of the Offset Management Plan and achievement of the completion criteria; ii. a risk rating for each identified risk event based on the likelihood and consequence of occurrence; iii. measures that will mitigate identified risk events (mitigation measures) by reducing the likelihood and/or lessening the consequence of occurrence for each risk event; iv. details including the timeframes and circumstances for the implementation of mitigation measures; and a rating of the residual risk for each risk event, based on the likelihood and consequence of occurrence with mitigation measures in place; and 	These details are included in the current OMP, however have been reviewed and updated.	Ongoing
		<ul style="list-style-type: none"> j. include a table comprised of the time-bound management measures, monitoring activities and corrective measures specified in the Offset management plan and a reference to where those actions and activities are detailed in the Offset management plan. 	Included in the current OMP.	Ongoing
C)		The approval holder must implement the Offset management plan at least until the expiry of this approval.	The annual OMP monitoring report will assess whether the approval holder is adequately implementing the OMP.	Ongoing
D)		Prior to expiry of the approval, the approval holder must ensure the version of the Offset management plan that is attached to the securing mechanism for the offset area, is the most recent version approved by the Minister.	To be addressed prior to the expiry of the approval.	Ongoing
E)		The approval holder must ensure the completion criteria detailed on the Offset management plan are achieved by 25 February 2031.	The approval holder will work to ensure the OMP completion criteria is completed in this timeframe.	Ongoing

Number	Current condition of approval	Proposed varied condition of approval	Notes on Compliance	Compliance Year 3
3.	Within 10 business days of the offset area being secured, the approval holder must provide the department with: <ul style="list-style-type: none"> 6. written evidence demonstrating that the offset area has been secured; and 7. shapefiles and the offset attributes of the offset area. 	No change	Addressed in Table 1.	Compliant
4.	To compensate for the removal of up to 23 Matted Flax-lily plants from within the action area: <ul style="list-style-type: none"> a. Prior to any clearance, the approval holder must undertake a pre-clearance survey to determine the number and locations of Matted Flax-lily plants within the action area. b. The approval holder must salvage and translocate all Matted Flax-lily plants identified by the pre-clearance survey. c. The approval holder must commence implementing the Salvage and translocation plan prior to undertaking any clearing. 	To compensate for the removal of Matted Flax-lily plants within the action area: <ul style="list-style-type: none"> a. Prior to any clearance, the approval holder must undertake a pre-clearance survey to determine the number and locations of Matted Flax-lily plants within the action area. b. The approval holder must salvage and translocate all Matted Flax-lily plants identified by the pre-clearance survey. c. The approval holder must commence implementing the Salvage and translocation plan prior to undertaking any clearing. 	This has been undertaken and is addressed in Table 1.	Compliant
5.	The approval holder must ensure that a minimum of 63 salvaged Matted Flax-lily plants have survived at the offset area at least 5 years after the date the last Matted-Flax Lily plant is translocated to the offset area. The approval holder must ensure that the location of each translocated Matted Flax-lily plant is recorded in the Atlas of Living Australia and the Victorian Biodiversity Atlas within 6 months of being translocated.	The approval holder must ensure that by 1 April 2025, the offset area contains a minimum of 189 salvaged Matted Flax-lily plants.	The number of salvaged MFL plants in the offset area currently has not been confirmed. This information will be included in the MFL monitoring report to be completed before 1 April 2025. A comment on this condition can be made once this number is determined.	Ongoing
A)		The approval holder must ensure that following 1 April 2025 and at least for the duration of this approval, at least 189 salvaged Matted Flax-lily plants are maintained in the offset area and are self-sustaining as defined in the Offset management plan.	The number of salvaged MFL plants in the offset area currently has not been confirmed. The annual MFL monitoring reports will confirm whether MFL are maintained in the offset area and are self-sustaining.	Ongoing
B)		The approval holder must ensure that the location of each translocated Matted Flax-lily plant is recorded in the Atlas of Living Australia and the Victorian Biodiversity Atlas within 6 months of being translocated.	All translocated MFLs have been georeferenced using a DGPS. Biosis will upload this information to the ALA and VBA within the specified timeframe.	Ongoing
6.	The approval holder must implement the Conservation management plan.	No change	Addressed in Table 1.	Ongoing
Part B – Standard administrative conditions				
7.	Notification of date of commencement of action The approval holder must notify the department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	No change	Addressed in Table 1.	Compliant
8.	Notification of date of commencement of action The approval holder must notify the department in writing of the date the last Matted-Flax Lily plant is translocated to the offset area within 10 business days after the date the last Matted-Flax Lily plant is translocated to the offset area.	No change	Addressed in Table 1.	Compliant
9.	Compliance records The approval holder must maintain accurate and complete compliance records.	No change	Addressed in Table 1.	Ongoing
10.	Compliance records 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.	No change	Addressed in Table 1.	Compliant

Number	Current condition of approval	Proposed varied condition of approval	Notes on Compliance	Compliance Year 3
	Note: Compliance records may be subject to audit by the department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the department’s website or through the general media.			
11.	Submission and publication of plans The approval holder must: <ul style="list-style-type: none">a. submit plans electronically to the department;b. unless otherwise agreed to in writing by the minister, publish each plan on the website within 20 business days of the date:<ul style="list-style-type: none">i. of this approval, if the version of the plan to be implemented is specified in these conditions; orii. the plan is approved by the minister in writing, if the plan requires the approval of the minister;c. exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; andd. keep plans published on the website until the end date of this approval.	No change	Addressed in Table 1.	Ongoing
12.	Submission and publication of plans The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan, is prepared in accordance with the department’s Guidelines for biological survey and mapped data (2018) and submitted electronically to the department in accordance with the requirements of the plans.	No change	Addressed in Table 1.	Compliant
13.	Annual compliance reporting The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the minister. The approval holder must: <ul style="list-style-type: none">f. publish each compliance report on the website within 60 business days following the relevant 12 month period;g. notify the department by email that a compliance report has been published on the website and provide the weblink for the compliance report within 5 business days of the date of publication;h. keep all compliance reports publicly available on the website until this approval expires;i. exclude or redact sensitive ecological data from compliance reports published on the website; andj. where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the department within 5 business days of publication. Note: Compliance reports may be published on the Department’s website	No change	Addressed in Table 1.	Non-compliant
14.	Reporting non-compliance The approval holder must notify the department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after	No change	Addressed in Table 1.	Not applicable

Number	Current condition of approval	Proposed varied condition of approval	Notes on Compliance	Compliance Year 3
	<p>becoming aware of the incident or non-compliance. The notification must specify:</p> <ul style="list-style-type: none"> d. any condition which is or may be in breach; e. a short description of the incident and/or non-compliance; and f. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available 			
15.	<p>Reporting non-compliance</p> <p>The approval holder must provide to the department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <ul style="list-style-type: none"> d. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; e. the potential impacts of the incident or non-compliance; and f. the method and timing of any remedial action that will be undertaken by the approval holder. 	No change	Addressed in Table 1.	Not applicable
16.	<p>Independent audit</p> <p>The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the minister.</p>	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period.	The audit period is every five years from the date of the approval. An independent audit of compliance with the conditions will be required before February 2026. This condition is not applicable for this reporting period.	Not applicable
17.	<p>Independent audit</p> <p>For each independent audit, the approval holder must:</p> <ul style="list-style-type: none"> d. provide the name and qualifications of the independent auditor and the draft audit criteria to the department; e. only commence the independent audit once the audit criteria have been approved in writing by the department; and f. submit an audit report to the department within the timeframe specified in the approved audit criteria 	The approval holder must submit details of the proposed independent auditor and their qualifications to the department within 10 business days following the end of each audit period.	To be addressed when the independent audit is required.	Ongoing
A)		The approval holder must ensure the scope of each independent audit is sufficient to determine the compliance status for: <ul style="list-style-type: none"> a. each condition of approval, and b. each commitment made in each plan. 	To be addressed when the independent audit is required.	Ongoing
B)		The approval holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the <i>Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines</i> , Commonwealth of Australia 2019.	To be addressed when the independent audit is required.	Ongoing
C)		Within 3 months following approval of the independent auditor, or as otherwise directed by the Minister in writing, the approval holder must submit an audit report to the department for written agreement from the department.	To be addressed when the independent audit is required.	Ongoing
D)		The approval holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the <i>Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines</i> , Commonwealth of Australia 2019.	To be addressed when the independent audit is required.	Ongoing

Number	Current condition of approval	Proposed varied condition of approval	Notes on Compliance	Compliance Year 3
18.	Independent audit The approval holder must publish the audit report on the website within 10 business days of receiving the department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	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 of the department agrees to the audit report in writing.	To be addressed when the independent audit is required.	Ongoing
A)		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 the department with the web address for where the audit report is published on the website.	To be addressed when the independent audit is required.	Ongoing
B)		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 date of this approval.	To be addressed when the independent audit is required.	Ongoing
19.	Completion of the action Within 20 business days after the completion of the action, the approval holder must notify the department in writing and provide completion data.	No change	Addressed in Table 1.	Not applicable

3 Future planning and management

The EPBC approval and associated conditions are in effect until April 2035.

The following actions are required for the ongoing management of the La Trobe University offset site and to remain compliant with EPBC conditions and MFLTP, CMP and OMP actions related to threatened flora:

- Continue implementation of land management activities outlined in the MFLTP, CMP and OMP (to be updated) which must be undertaken by experienced conservation land managers.
- Monitor the condition of the translocated Matted Flax-lily plants salvaged from the action area as per the MFLTP.

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Biosis 2020b. *La Trobe University Sports Park Precinct Stage 3 Conservation Management Plan*, Report prepared for La Trobe University. Authors: Milne, L. & White, J. Biosis Pty Ltd, Melbourne, VIC. Project no. 30363.

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