

Wednesday, 19 August 2026

RZ Resources

Attention: [REDACTED]

Manager - Environment & Approvals

Delivery via: Email [REDACTED]

Copi Minerals Sands Project (EPBC 2024/09955)

Preliminary Documentation: Response to Public Comment Submission RFI

Dear [REDACTED]

As requested, Biodiversity Australia provides the following response to the Request for Further Information (RFI) received via email dated 9 July from [REDACTED], the Senior Assessment Officer at the National Environmental Protection Agency (NEPA) as per Appendix A.

Specifically, this response addresses the following item:

Additional detail on the PCTs in the Bells Grove Property and how this offset contributes to the ongoing viability of the:

- *Pink Cockatoo (eastern) (Lophochroa leadbeateri leadbeateri),*
- *South-eastern Hooded Robin (Melanodryas cucullata cucullata),*
- *Southern Whiteface (Aphelocephala leucopsis),*
- *Corben's Long-eared Bat (Nyctophilus corbeni), and*
- *Mallee Bird Community of the Murray Darling Depression Bioregion. (Particularly in relation to like-for-like offsets for this ecological community).*

The response considers the ecological relationship between the impact and proposed offset sites, including PCT representation, vegetation condition, habitat extent, landscape context and the anticipated conservation benefits of securing and managing the proposed Bells Grove Property under a Biodiversity Stewardship Agreement.

Application of New South Wales Biodiversity Offset Scheme to the Copi Mineral Sands Project

The New South Wales (NSW) Biodiversity Offset Scheme (BOS) was established under the *Biodiversity Conservation Act 2016* (BC Act) to provide a framework for assessing and addressing biodiversity impacts associated with the development. The BOS incorporates the Biodiversity Assessment Method (BAM), which provides a consistent methodology for assessing biodiversity values and impacts and determining biodiversity credit requirements.



The BOS applies the mitigation hierarchy of avoiding and minimising impacts before addressing residual impacts through biodiversity offsets. Where an offset obligation is generated, the NSW framework provides a number of mechanisms through which biodiversity obligations may be satisfied, including:

- Establishing a self-driven Biodiversity Stewardship Agreement (BSA),
- Seeking Biodiversity Credits (the common unit for measuring biodiversity under the Scheme) on the biodiversity credit market,
- Making a payment into the Biodiversity Conservation Fund (BCF),
- Seeking to make a payment into the BCF under the variation rules options, and
- Other biodiversity conservation measures.

Commonwealth MNES listed species or their habitat have been considered and assessed within the BDAR. The Copi Mineral Sands Project has been assessed under the NSW BAM, and Biodiversity Australia has quantified the biodiversity credit requirements associated with the residual biodiversity impacts of the Project in the *Copi Biodiversity Development Assessment Report (BDAR) 2026*. The BDAR identifies the biodiversity credits required to address the residual impacts of the Project following consideration of measures to avoid and minimise impacts.

The BAM therefore provides the principal technical framework for quantifying the biodiversity impacts of the Project and determining the biodiversity credit obligations under the NSW BOS.

Application of the New South Wales Bilateral Agreement for Environmental Assessments

The NSW Assessment Bilateral Agreement with the Australian Government provides for eligible major projects requiring approval under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to be assessed through the NSW environmental assessment process. The Agreement, as amended in March 2020, allows the NSW Government to undertake the environmental assessment of an action on behalf of the Australian Government, thereby reducing duplication between the State and Commonwealth assessment processes. This arrangement aims to streamline biodiversity assessment and offsetting while ensuring that Commonwealth offset requirements are appropriately addressed. Nevertheless, the Australian Government remains the decision-maker under the EPBC Act and uses the NSW assessment report to inform its decision on whether to approve the action.

The Bilateral Assessment Agreement and the NSW BOS are complementary but distinct components of the assessment and offsetting framework. The bilateral agreement establishes the mechanism by which the NSW assessment process can be used to assess an eligible action for EPBC Act purposes, while the Commonwealth has separately endorsed the NSW BOS, including the BAM, biodiversity credit system and applicable offset rules, as an approach for addressing biodiversity offset obligations for relevant EPBC Act projects. The Commonwealth's endorsement applies to NSW projects requiring EPBC Act approval and is not limited to projects assessed under the bilateral agreement.

Under the EPBC Act the mitigation hierarchy requires impacts to protected matters to be addressed through avoidance, mitigation and, where residual impacts remain, offsetting. The NSW BOS applies a complementary hierarchy of avoiding and minimising impacts before addressing residual biodiversity impacts through offsetting.

Measures to avoid, mitigate, or minimise biodiversity impacts from the Copi Mineral Sands Project have been incorporated into the Copi Mineral Sands Project design and are clearly documented in the Copi BDAR

(2026). These measures have informed the final Development Footprint and the assessment of residual biodiversity impacts for which offset obligations have been calculated.

Through the NSW Copi BDAR and the NEPA Preliminary Documentation, the Copi Mineral Sands Project provides the environmental assessment information relevant to both NSW and Commonwealth assessment requirements. The Project is being assessed under the applicable NSW and Commonwealth approval frameworks, with the NSW Biodiversity Offset Scheme providing the principal framework for quantifying the Project's biodiversity impacts and determining the associated biodiversity credit obligations. The Australian Government has endorsed the NSW Biodiversity Offset Scheme, including the Biodiversity Assessment Method, biodiversity credit system and applicable offset rules, for use in addressing relevant biodiversity offset obligations under the EPBC Act.

Status of Proposed Offset Site

The proposed Bells Grove Biodiversity Stewardship Agreement (BSA) site is one of several properties currently being investigated by the proponent as potential offset sites for the Copi Mineral Sands Project. While preliminary investigations of the Bells Grove Property indicate that the site has the capacity to provide sufficient biodiversity values to meet, and potentially exceed, the biodiversity offset obligations identified for the Project, the site has not yet been formally selected, secured or confirmed as the final offset site. Other properties within the surrounding region are also being investigated as potential offset opportunities. The assessment presented below therefore considers Bells Grove as a potential offset site based on the information currently available and should not be interpreted as confirmation that the site will ultimately be utilised to satisfy the Project's offset obligations. Final selection of the offset site or combination of sites will be subject to further ecological assessment, confirmation of biodiversity credit values, landholder arrangements and the relevant approval and stewardship processes.

Accordingly, the findings presented for the Bells Grove Property should be regarded as preliminary and subject to refinement as the offset investigation progresses.

Impact and Offset Site Locations and Conditions

The proposed Bells Grove Biodiversity Stewardship Agreement (BSA) Credit Offset Site is located approximately 7 km southwest of the Copi Mineral Sands Project Development Footprint. Both properties are located within the South Olary Plain IBRA Subregion and occur within the same arid climatic and landscape context. The sites share comparable landscape features, including salt lakes, salt pans and clay pans, and support a number of the same Plant Community Types (PCT) with associated Offset Trading Groups (OTG) as shown in Table 1 below.

Vegetation communities occurring across the two sites include Salt Lake-fringing chenopod shrublands, sparse woodlands, low red-sand spinifex dunes, mallee woodlands and exposed gypseous grasslands. The ecological condition of vegetation at both sites have been influenced by similar environmental and land-use pressures, including periods of drought, floods and heavy goat grazing during the past 10 years. These shared environmental conditions provide an appropriate regional and ecological context for the proposed offset site.

A thorough series of ecological assessments, conducted by Biodiversity Australia, at the Copi Mineral Sands Project Development Footprint in 2024 and 2025 included detailed vegetation surveys and ground-truthing to verify the presence and distribution of thirteen (13) PCTs (

Table 2). These assessments provide a robust basis for comparison between the vegetation values present within the development Footprint and those represented at the proposed Bells Grove BSA Offset Site.



Preliminary ecological assessments undertaken at the proposed Bells Grove BSA Offset Site ground-truthed and verified the presence of six (6) PCTs. Five (5) of these PCTs occur at both sites, demonstrating a high degree of vegetation and ecological similarity between the impact and proposed offset sites.

The sixth (6th) PCT identified at Bells Grove (PCT 153 *Black Bluebush low open shrubland of the alluvial plains and sandplains of the arid and semi-arid zones*) was not recorded within the Copi Mineral Sands Project Development Footprint. However, PCT 153 belongs to the same Offset Trading Group (Aeolian Chenopod Shrublands <50%) as PCT 154 (*Pearl Bluebush low open shrubland of the arid and semi-arid plains*) which occurs extensively across both the Copi Development Footprint and the Bells Grove Property.

The occurrence of PCT 153 at Bells Grove therefore represents vegetation within the same recognised offset trading group as PCT 154 affected by the Copi Project. This provides an appropriate basis for the proposed credit offset, while also demonstrating that Bells Grove supports a broader representation of the vegetation communities and landscape values characteristic of the South Olary Plain Subregion.

The vegetation mapping for the Bells Grove proposed BSA Offset Site is provided in Appendix B.

Table 1: Offset Trading Groups with corresponding PCTs present on both properties

PCT	PCT Name	Offset Trading Group
58	Black Oak – Western Rosewood open woodland on deep sandy loams mainly in the Murray Darling Depression Bioregion	Semi-arid sandplain woodlands <50% - < 70%
64	Samphire - Water Weed - Sea-Heath shrubland saline wetland of depressions of the arid and semi-arid	Inland Saline Lakes <50%
153	Black Bluebush low open shrubland of the alluvial plains and sandplains of the arid and semi-arid zones	Aeolian Chenopod Shrublands <50%
154	Pearl Bluebush low open shrubland of the arid and semi-arid plains	Aeolian Chenopod Shrublands <50%
170	Chenopod sandplain mallee woodland/shrubland	Sand Plain Mallee Woodlands < 50%
171	Spinifex linear dune mallee mainly of the Murray Darling Depression Bioregion	Dune Mallee Woodlands <50%

Table 2: Plant Community Types present within the Copi and Bells Grove properties

PCT	28	58	64	143	152	153	154	157	170	171	215	221	253	254	Total (ha)
Copi Mineral Sands Project Development Footprint	0.77	238.42	641.13	17.52	250.4	0	1,669.8	495.38	15.59	12.11	5.91	395.14	139.72	1.16	3,883.08
Bells BSA Offset Site	0	2,138	2,069	0	0	3,327	832	0	3,637	404	0	0	0	0	12,407



Area and Condition of Native Vegetation

The Copi Mineral Sands Project Development Footprint will impact approximately 3,883.08 ha of native vegetation. In comparison, the proposed Bells Grove BSA Offset Site contains approximately 12,407 ha of native vegetation, providing a substantially larger area of native vegetation within the proposed offset site.

Vegetation Integrity (VI) plots were conducted at both sites in line with Biodiversity Assessment Method (BAM) 2020. Field data collected from the VI plots were entered into the BAM Calculator (BAM-C), with the resulting VI scores used to calculate the average vegetation integrity for the relevant vegetation zones at each site. The results indicate that, at a site-wide level, the vegetation at both the Copi Development Footprint and Bells Grove is generally in moderate to high condition. However, variation in vegetation integrity occurs between individual vegetation zones, reflecting differences in vegetation structure, composition, disturbance history and environmental conditions. The average VI scores for the relevant vegetation zones at each site are presented in Table 3.

Table 3: Comparison of Vegetation Integrity Scores between Copi and Bells Grove properties

	Copi Mineral Sands Project Development Footprint		Bells Grove BSA Offset Site		
PCT	Average VI Scores	Area (ha)	Average VI Scores	Area (ha)	Variation
58	53.8	238.42	34.4	2,138	-19.4
64	49.9	641.13	64.9	2,069	15
153	N/A	N/A	28.9	3,327	N/A
154	34.2	1,669.8	22.2	832	-12
170	26.1	15.59	26.1	3,637	0

Although PCT 171 occurs at both sites, BAM VI plots were not conducted within the mapped area of PCT 171 at the Bells Grove property during field assessments, and therefore BAM VI plot data for PCT 171 is not included in Table 3 above.

The average VI scores recorded within PCT 58 and PCT 154 at the proposed Bells Grove Offset Site were lower than the corresponding average VI scores recorded within the Copi Development Footprint. However, in contrast, the average VI score recorded for PCT 64 at Bells Grove was higher than that recorded within the Development Footprint, while the average VI score of PCT 170 was equal across both sites.

Although some variation in vegetation condition exists between the impact and offset sites, the proposed Bells Grove Offset Site provides substantially larger areas of native vegetation for each relevant PCT. All of the Bells Grove offset areas exceed the extent of the corresponding PCT impacted within the Copi Development Footprint, except for PCT 154.

While the area of PCT 154 at Bells Grove is smaller than the area impacted within the Development Footprint, PCT 154 and PCT 153 are assigned to the same Offset Trading Group (Aeolian Chenopod Shrublands <50%). PCT 153 occurs extensively within the Bells Grove Offset Site and contributes to the overall offset area available within this Offset Trading Group. Consequently, the combined area of PCT 153 and PCT 154 at Bells Grove substantially exceeds the area of PCT 154 impacted by the Copi Development Footprint.



These results demonstrate that vegetation condition varies between the impact and proposed offset sites, with the Bells Grove property supporting vegetation of equal or higher integrity for some PCTs and lower integrity for others. Importantly, the proposed BSA would secure substantially larger areas of the relevant vegetation communities and provide for ongoing management aimed at preventing further degradation and improving vegetation condition over time within the relevant PCTs and Offset Trading Groups.

Threatened Entities and Associated Habitat

Clearing of native vegetation associated with the Copi Mineral Sands Project will impact habitat associated with threatened species and ecological communities listed under the *NSW Biodiversity Conservation Act 2016* and the *Commonwealth Environment Protection and Biodiversity Act 1999*. The proposed Bells Grove BSA Offset Site supports habitat associated with the biodiversity values and provides the corresponding offset area for the Copi Development Footprint.

The relevant threatened species and communities are:

- Pink Cockatoo (eastern) (*Lophochroa leadbeateri leadbeateri*) - Vulnerable (BC Act) and Endangered (EPBC Act),
- South-eastern Hooded Robin (*Melanodryas cucullata cucullata*) - Endangered (BC Act & EPBC Act),
- Southern Whiteface (*Aphelocephala leucopsis*) - Vulnerable (BC Act & EPBC Act),
- Corben's Long-eared Bat (*Nyctophilus corbeni*) - Vulnerable (BC Act & EPBC Act), and
- Mallee Bird Community of the Murray Darling Depression Bioregion - Endangered (EPBC Act).

The following comparison demonstrates that the proposed Bells Grove BSA Offset Site contains substantially greater areas of habitat associated with each of the relevant threatened species and ecological community than the area of corresponding habitat impacted by the Copi Development Footprint. This comparison is based on the overall total associated habitat occurring at each site; with the exception of the Mallee Bird Community (MBC) which has exactly two associated PCTs present at each site, the comparisons below are not like-for-like PCT comparisons as shown in Table 4.

Pink Cockatoo

The Pink Cockatoo habitat within the Copi Development Footprint is associated with 11 PCTs, comprising 2,746.57 ha. The proposed Bells Grove BSA Offset Site supports approximately 10,338 ha of habitat associated with the Pink Cockatoo across 5 PCTs.

Therefore, the area of Pink Cockatoo habitat impacted by the Copi Project represents approximately 26.57% of the corresponding habitat available at the Bells Grove property. Accordingly, the proposed Bells Grove Offset Site provides approximately 7,591 ha more associated habitat than is proposed to be impacted within the Copi Development Footprint.

South-eastern Hooded Robin

The South-eastern Hooded Robin habitat within the Copi Development Footprint is associated with 8 PCTs, comprising 686.62 ha. The proposed Bells Grove BSA Offset Site provides 6,179 ha of South-eastern Hooded Robin habitat across 3 associated PCTs.

Therefore, the area of habitat impacted by the Copi Project represents approximately 11.11% of the corresponding habitat available at the Bells Grove property. Accordingly, the proposed offset site provides approximately 5,492 ha more associated habitat than is impacted within the Copi Development Footprint.



Southern Whiteface

The Southern Whiteface is associated with 9 PCTs within the Copi Development Footprint, comprising 2,350.27 ha. The proposed Bells Grove BSA Offset Site supports approximately 10,338 ha of Southern Whiteface habitat across 5 associated PCTs.

Therefore, the area of Southern Whiteface habitat impacted by the Copi Project represents approximately 22.73% of the corresponding habitat available at Bells Grove. Accordingly, the proposed offset site provides approximately 7,988 ha more associated habitat than is impacted within the Copi Development Footprint.

Corben's Long-eared Bat

Corben's Long-eared Bat is associated with 5 PCTs within the Copi Development Footprint, comprising 662.03 ha. The proposed Bells Grove BSA Offset Site supports approximately 6,179 ha of associated habitat for Corben's Long-eared Bat habitat across 3 associated PCTs.

Therefore, the area of Corben's Long-eared Bat impacted by the Copi Project represents 10.71% of the corresponding habitat available to Bells Grove. Accordingly, the proposed BSA Offset Site provides approximately 5,517 ha more associated habitat than is impacted within the Copi Development Footprint.

Mallee Bird Community of the Murray Darling Depression Bioregion

The MBC within the Copi Development Footprint is associated with 2 PCTs, comprising 27.7 ha. The proposed Bells Grove BSA Offset Site supports approximately 4,041 ha of habitat associated with the community across 2 associated PCTs.

Therefore, the area of MBC habitat impacted by the Copi Project represents 0.69% of the corresponding habitat available at Bells Grove. Accordingly, the proposed BSA Offset Site provides approximately 4,013 ha more associated habitat than is impacted within the Copi Development Footprint.

Overall, the above comparisons demonstrate that the proposed Bells Grove BSA Offset Site provides substantially greater areas of habitat associated with the relevant threatened species and ecological community than are affected by the Copi Development Footprint. The offset site therefore provides a significant area of representative habitat within the same regional landscape context and relevant PCTs and Offset Trading Groups as those affected by the Project.

Table 4: Threatened Species & Ecological Community - PCT Associations and areas

Threatened Entity	Copi Mineral Sands Project		Bells Grove BSA Offset Site		TBDC Profile ID
	Associated PCTs	Footprint Area (ha)	Associated PCTs	Area (ha)	
Pink Cockatoo (eastern) (<i>Lophochroa leadbeateri</i> <i>leadbeateri</i>)	28, 58, 143, 152, 154, 170, 171, 215, 221, 253, 254	2,746.57	58,153, 154, 170, 171	10,338	10,116
South-eastern Hooded Robin (<i>Melanodryas cucullata</i> <i>cucullata</i>)	28, 58, 143, 170, 171, 215, 221, 254	686.62	58, 170, 171	6,179	10,519
Southern Whiteface (<i>Aphelocephala leucopsis</i>)	28, 58, 143, 152, 154, 170, 171, 215, 253	2,350.27	58, 153, 154, 170, 171	10,338	20,442



	Copi Mineral Sands Project		Bells Grove BSA Offset Site		
Threatened Entity	Associated PCTs	Footprint Area (ha)	Associated PCTs	Area (ha)	TBDC Profile ID
Corben's Long-eared Bat (<i>Nyctophilus corbeni</i>)	28, 58, 170, 171, 221	662.03	58, 170, 171	6,179	10,568
Mallee Bird Community of the Murray Darling Depression Bioregion.	170, 171	27.70	170, 171	4,041	20,434

Based on the total habitat areas presented in Table 4, the proposed Bells Grove habitat represents approximately 3.8 times the Pink Cockatoo-associated habitat impacted, 9.0 times the South-eastern Hooded Robin-associated habitat, 4.4 times the Southern Whiteface-associated habitat, 9.3 times the Corben's Long-eared Bat-associated habitat and 146 times the Mallee Bird Community habitat.

A breakdown of the impacts within the Copi Mineral Sands Mine Development Footprint compared to the proposed BSA offset credit areas for each Threatened Species and Community, is presented in Table 5 below.

The comparison demonstrates the extent to which the proposed Bells Grove site provides corresponding vegetation and habitat values within the same regional landscape context. For PCTs that occur at both the impact and proposed offset sites, the comparison is based on the corresponding PCT. Where an exact PCT match is not available, the assessment considers the relevant Offset Trading Group and associated habitat values. The Mallee Bird Community provides the strongest direct like-for-like comparison, with both the impacted and proposed offset areas represented by PCTs 170 and 171. On this basis, the proposed Bells Grove site provides substantially greater areas of corresponding habitat than are affected by the Project for each of the threatened entities considered.

The like-for-like comparison is based purely on the PCTs available at both sites to be offset and demonstrates that the proposed Bells Grove BSA contains substantially greater areas of the relevant PCTs associated with each threatened entity than the areas affected within the Copi Development Footprint.

Table 5: Like-for-like PCT area comparison between the Copi Development Footprint and Bells Grove BSA

Pink Cockatoo (eastern) (<i>Lophochroa leadbeateri leadbeateri</i>) associated PCT	Copi Mine Impacts	Bells Grove Offset
153	N/A	3,327
154	1,669.8	832
170	15.6	3,637
171	12.1	404
58	238	2,138
Total	1,936	10,338



South-eastern Hooded Robin (<i>Melanodryas cucullata cucullata</i>) associated PCT	Copi Mine Impacts	Bells Grove Offset
170	15.6	3,637
171	12.1	404
58	238	2,138
Total	265.7	6,179
Southern Whiteface (<i>Aphelocephala leucopsis</i>) associated PCT	Copi Mine Impacts	Bells Grove Offset
153	N/A	3,327
154	1,669.8	832
170	15.6	3,637
171	12.1	404
58	238	2,138
Total	1,935.5	10,338
Corben's Long-eared Bat (<i>Nyctophilus corbeni</i>) associated PCT	Copi Mine Impacts	Bells Grove Offset
170	15.6	3,637
171	12.1	404
58	238	2,138
Total	265.7	6,179
Mallee Bird Community of the Murray Darling Depression Bioregion associated PCT	Copi Mine Impacts	Bells Grove Offset
170	15.6	3,637
171	12.1	404
Total	27.7	4,041

Averted Loss

The improvement in vegetation and habitat condition expected to occur through the management of land as a biodiversity offset, compared with the likely future condition of the vegetation if the land were to remain unmanaged, is referred to as averted loss. The magnitude of averted loss can vary considerably between vegetation types and locations, depending on the nature and intensity of environmental and anthropogenic pressures affecting the land.



Agriculture land use has historically resulted in substantial modification of vegetation within the South Olary Plain IBRA Subregion. In particular, grazing by feral goats, represents a significant and ongoing pressure on vegetation condition and habitat availability. Overgrazing can reduce vegetation cover and structural complexity, affect regeneration and recruitment, alter floristic composition and reduce the availability of quality habitat for native fauna.

The proposed management of the proposed Bells Grove BSA Offset Site will include the exclusion and management of feral goats and other grazing pressures. Removing or substantially reducing these pressures is expected to prevent further degradation and allow natural regeneration and recovery of vegetation. Over time, this is expected to result in improvements in vegetation integrity, vegetation structure and habitat availability and quality. In addition to protecting existing habitat, improved vegetation condition and ecological function may increase the capacity of the site to support threatened species and ecological communities and contribute to the persistence, recruitment and potential expansion of local populations.

Accordingly, the conservation benefit of the proposed BSA is not limited to the retention of existing habitat; the proposed management regime is also expected to prevent further degradation and facilitate improvement in vegetation condition, thereby increasing the long-term security and ecological function of habitat supporting the relevant threatened species and ecological community.

Viability of the Threatened Species and Community

The proposed Bells Grove BSA provides an opportunity to secure and manage large areas of PCTs 58, 153, 154, 170 and 171 through the exclusion of grazing pressures, ongoing management and monitoring, and implementation of the management actions identified through the Bells Grove Biodiversity Stewardship Site Assessment Report (BSSAR) and subsequent Site Management Plan (SMP).

If approved and established, the Bells Grove BSA Offset Site is anticipated to deliver a beneficial conservation outcome which is expected to improve and maintain vegetation condition and ecological function across the site and consequently increase the capacity of the site to support viable populations of Pink Cockatoo, South-eastern Hooded Robin, Southern Whiteface, Corbens Long-eared Bat and the Mallee Bird Community of the Murray Darling Depression Bioregion.

A key conservation benefit of the proposed BSA is the protection of a large, relatively contiguous area of habitat within the same regional landscape and vegetation communities as those affected by the Copi Mineral Sands Project. The exclusion and management of goats and other grazing stock, together with ongoing monitoring and adaptive management, aims to reduce key threats to habitat condition and assist in maintaining the ecological functions required by the relevant threatened species and ecological community.

A population viability analysis has not been undertaken for the threatened species considered in this assessment. Accordingly, the proposed BSA cannot be relied upon to demonstrate a quantifiable increase in population viability. Rather, the conservation benefit is assessed in terms of the extent, condition, security and management of suitable habitat and the extent to which the proposed management addresses known threats to habitat condition and ecological function.

Pink Cockatoo

Conservation advice for the Pink Cockatoo (DCCEEW 2023¹) lists the following two items (within Conservation and management priorities – Habitat Loss and degradation, page 12) as relating to both species and population viability:

- Protect, restore and enhance the quality of known suitable habitat and increase the extent of habitat for the subspecies across its range (both current and future) to maintain viability in response to threats, including climate change.
- Identify important populations and engage stakeholders in the development and implementation of a local area management plan (a map-based document detailing the works necessary to secure the long-term viability of the population). Undertake baseline studies to support the preparation of these management plans.

The proposed Bells Grove BSA is consistent with these conservation priorities. The BSSAR and subsequent SMP aims to establish a framework for protecting, restoring and enhancing suitable Pink Cockatoo habitat through active and passive management measures. In particular, the management of grazing pressures and protection of native vegetation is expected to improve the condition and ecological function of approximately 10,338 ha of habitat associated with the Pink Cockatoo at Bells Grove.

The proposed management actions are therefore expected to increase the quality, extent and long-term security of suitable habitat and improve the capacity of the proposed Bells Grove site to support the Pink Cockatoo and local populations over the long term.

South-eastern Hooded Robin

Although a population viability analysis has not been undertaken for the South-eastern Hooded Robin, the proposed BSA would secure approximately 6,179 ha of associated habitat across PCTs 58, 170 and 171. These vegetation communities provide the structural and landscape characteristics relevant to the species, while the proposed management of grazing pressures is expected to reduce ongoing degradation and facilitate maintenance and regeneration of native vegetation.

The large area of habitat proposed for protection, combined with its location within the same regional landscape context as the Copi Development Footprint, is expected to maintain and improve the capacity of the site to support South-eastern Hooded Robin individuals and local populations. The conservation benefit is therefore principally derived from the long-term security and management of suitable habitat rather than from a demonstrated change in population viability.

Southern Whiteface

Although a population viability analysis has not been undertaken for the Southern Whiteface, the aim of the BSSAR and subsequent SMP is to improve and sustain the viability of the species through increasing the ecological condition of 10,338 ha of Southern Whiteface habitat associated with the species at Bells Grove.

Conservation advice lists promoting the uptake of biodiversity stewardship programs to retain Southern Whiteface habitat as a conservation and management priority. The proposed BSA is directly consistent with this approach by securing habitat under long-term conservation management and reducing key threats, including intensive grazing and associated habitat degradation (DCCEW 2023³).

The BSSAR and subsequent SMP are intended to maintain and improve the condition and long-term security of suitable Southern Whiteface habitat and thereby increase the capacity of the proposed Bells Grove Offset Site to support the species.

Corben's Long-eared Bat

Corben's Long-eared Bat requires extensive areas of suitable habitat, and fragmentation and reduction of habitat can increase the species vulnerability to local extinction. Small and isolated fragments of vegetation may reduce habitat value and may be less capable of supporting viable populations than large, connected



areas of suitable vegetation (Woinarski *et al.* 2014). Ongoing fragmentation of habitat may leave bats more vulnerable to local extinction through reductions in fitness (Schulz and Lumsden 2010).

The proposed Bells Grove BSA provides approximately 6,179 ha of habitat associated with Corben's Long-eared Bat within a single managed property. The protection and management of this extensive area is anticipated to reduce the risk of further habitat degradation and fragmentation and provide for the maintenance and improvement of vegetation condition under long-term conservation agreement.

The BSSAR and subsequent SMP aims to establish management measures designed to maintain and improve ecological function across the offset site. These measures are expected to improve the quality and long-term security of habitat available to Corben's Long-eared Bat and increase the capacity of the offset site to support the species and local populations.

Mallee Bird Community

The Mallee Bird Community of the Murray Darling Depression Bioregion (MBC) within the Copi Development Footprint is associated with PCTs 170 and 171, comprising approximately 27.70 ha of affected habitat. The proposed Bells Grove BSA contains approximately 4,041 ha of these same two PCTs and therefore provides direct representation of the vegetation communities associated with the MBC at the Development Footprint.

This is particularly relevant to the Commonwealth's like-for-like offset requirements for listed threatened ecological communities. PCTs 170 and 171 occur at both the Copi Development Footprint and Bells Grove, providing a direct vegetation-community relationship between the impact and proposed offset sites.

The proposed BSA would secure the Bells Grove areas under long-term conservation management and address key threats including grazing pressure and associated degradation. Management of these areas is expected to maintain and improve vegetation condition, structural complexity and ecological function and thereby improve the capacity of the offset site to retain the characteristic species assemblage of the MBC.

The proposed offset therefore provides approximately 4,041 ha of the same PCTs associated with the MBC, compared with approximately 27.70 ha affected by the Project, representing substantially greater spatial representation of the community within the proposed offset site.

Conclusion

Biodiversity Australia has responded to the NEPA Request for Further Information (RFI) using the ecological, vegetation mapping, BAM and species information currently available for the Copi Mineral Sands Project and the proposed Bells Grove BSA Offset Site.

The biodiversity assessment and offset calculations for the Project have been undertaken in accordance with the NSW Biodiversity Assessment Method and Biodiversity Offsets Scheme (BOS). The BOS provides the primary framework for quantifying the biodiversity impacts of the Project and determining the associated biodiversity credit obligations.

The proposed Bells Grove BSA Offset Site represents a strong potential offset opportunity for the Copi Mineral Sands Project, subject to confirmation of the site's biodiversity credit values, suitability, availability and completion of the relevant approvals and stewardship process. The proposed offset site is located within the same South Olary Plain IBRA Subregion as the Development Footprint and supports the same or closely related PCTs and Offset Trading Groups that are like-for-like. It also provides substantially greater areas of associated habitat for the threatened species and ecological community considered in this assessment.

Importantly, if established and approved as a BSA site, Bells Grove would secure these biodiversity values under long-term management, protecting and managing the relevant PCTs. Implementation of the proposed



management actions would be expected to improve and maintain vegetation condition and ecological function across the site and, consequently, improve the capacity of the site to support viable populations of Pink Cockatoo, South-eastern Hooded Robin, Southern Whiteface, Corben's Long-eared Bat and the Mallee Bird Community. The resulting averted loss and expected improvement in vegetation condition and ecological function would provide a meaningful conservation benefit for the relevant threatened species and ecological community. Establishment of the BSA Offset Site is anticipated to provide an opportunity to address key threatening processes such as feral goat overgrazing pressures.

Any residual biodiversity credit obligations that cannot be satisfied through direct offsetting are proposed to be addressed through payment into the Biodiversity Conservation Fund, in accordance with the applicable NSW BOS provisions. Where the proposed BSA generates biodiversity credits in excess of those required to satisfy the Project's offset obligations, any surplus credits would remain available to the client and may be retained, used to satisfy other eligible biodiversity offset obligations, or sold or otherwise dealt with in accordance with the provisions and requirements of the NSW Biodiversity Offset Scheme.

The proposed Bells Grove BSA Offset Site has not yet been formally secured or confirmed as the final offset site. Biodiversity Australia is continuing to investigate Bells Grove, together with other potential offset options, to determine the most appropriate mechanism for satisfying the Project's biodiversity offset obligations.



Project Manager / Senior Ecologist

BA. (CSU) & BSc. Biology (MqU)

BAM Accredited Assessor: BAAS 25008



References

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