Annual Compliance Report (EPBC 2014/7126)

Lot 682, Rowley Road, Mandogalup

QUBE Property Group

Suite 3 Level 1 437 Roberts Road Subiaco WA 6008

Prepared by:

SLR Consulting Australia

Level 1, 500 Hay Street, Subiaco WA 6008,
Australia

SLR Project No.: 675.073525.00001

10 November 2026

Revision: 1.0

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1.0	5 November 2026	Ella Holmes	Oliver Jamieson	Meredith Ong

Basis of Report

This report has been prepared by SLR Consulting Australia (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with QUBE Property Group (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

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: Mark Peter Hay Hector

Position: Director

Organisation: QUBE Property Group Pty Ltd

ABN: 19 805 088 556

Date: 10/11/2026

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1.0 Introduction

SLR was commissioned by QUBE Property Group (QUBE) to assess and report on the status of and compliance with the conditions of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval 2014/7126 (EPBC 2014/7126) to clear native vegetation on Lot 682 Rowley Road, Mandogalup, Western Australia (the site). The approval period for EPBC 2014/7126 was extended to 31 July 2029, this decision was made on the 18 October 2023.

This report has been prepared for the purpose of meeting the requirements of Condition 6 of EPBC 2014/7126, which requires the proponent to verify compliance with the conditions of approval.

1.1 Project Background

QUBE is developing the Apsley Estate on Lot 682 Rowley Road, Mandogalup, Western Australia for residential purposes. Located approximately 33 km south of Perth within the City of Kwinana, the site is approximately 98 hectares (ha) in size and comprises three portions of land separated by two easements; one for a Western Power easement and one for the Peel main drain.

Previous clearing undertaken outside of the EPBC 2014/7126 boundary, within the Western Power easement and the Urban Deferred Planning Control Area, was subject to a separate referral EPBC 2018/8186. On 11 April 2018 the referral was determined not a controlled action.

1.2 Description of Activities

Clearing was undertaken within the site during the audit reporting period (20 August 2025 – 23 August 2026). Clearing occurred both inside and outside the Black Cockatoo breeding season (July to November).

Clearing comprised Stages 15 and 16 on 18, 19 and 22 September 2025 and an area south of the Peel Main Drain on 19 January 2026. The Stages 15 and 16 clearing removed 4.54 ha of Black Cockatoo foraging habitat, as mapped for EPBC 2014/7126. The clearing south of the Peel Main Drain was outside the mapped habitat. SLR verified these areas using GIS (Section 2.2 and Appendix C).

1.3 Audit Details

The details of the audit are outlined in Table 1.

Table 1: Audit Details

Audit Details	
Date of Audit	October 2026
Client	QUBE Property
Client Contact	Michael Mignacca, Assistant Development Manager
Auditors	Ella Holmes, Oliver Jamieson, Meredith Ong
Auditee	QUBE Property/Michael Mignacca
Site Address	Lot 682 Rowley Road, Mandogalup

Audit Details	
Contact	michaelm@qubeproperty.com.au / 08 6424 3521

2.0 Methodology

2.1 Purpose and Scope

The purpose and scope of this document are to fulfil the requirements of the EBPC Approval 2014/7126 - Condition 6, which states:

> *Within three months of every twelve-month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each if the conditions of this approval of the last twelve months. Documentary evidence providing proof of the date of publication must be provided to the Department at the same time as the compliance report is published. The compliance reports must remain on the website for 12 months form the date of publishing. Potential or actual contraventions of the conditions of approval must be reported to the Department in writing within two business days of the approval holder becoming aware of the actual or potential contravention. All contraventions must also be included in the compliance reports. Unless otherwise agreed to in writing by the Minister the approval holder must provide a copy of the compliance report to members of the public. Copies must be provided free of charge as soon as reasonably practicable but within no longer than 7 days of the request.*

This Annual Compliance Report (ACR) is intended to address the above condition and covers the period from 20 August 2025 to 23 August 2026. This ACR will address each of the conditions associated with Approval 2014/7126.

2.2 Audit Methodology

The audit was undertaken in October 2026. It involved interviewing the QUBE Assistant Development Manager and a desktop review of evidence documentation and shapefiles provided by QUBE. SLR verified the Black Cockatoo habitat clearing using GIS, as described below (Appendix C).

Condition 1 limits clearing to 38.7 ha of Black Cockatoo foraging and potential breeding habitat. SLR calculated the habitat cleared during the reporting period using the following process. The Black Cockatoo foraging habitat mapped in the preliminary documentation for EPBC 2014/7126 was digitised in GIS. The clearing footprint for the reporting period was then digitised from aerial imagery and the clearing data provided by QUBE. The clearing footprint was clipped to the mapped habitat, and the area inside the mapped habitat was reported as Black Cockatoo habitat clearing. Areas were calculated in GDA2020 MGA Zone 50.

Consistent with the basis of the approval, habitat clearing was measured against the mapped habitat boundary. It was not reduced to the vegetation present at the time of clearing. The vegetation clearing extent is shown in Appendix C for reference only.

This ACR was undertaken according to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) Annual Compliance Report Guidelines (2023), with the Definitions of Compliance summarised in Table 2.

Table 2: Definitions of Compliance

Compliance	Definition
Compliant	'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-compliant	A designation of 'non-compliant' must be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not applicable	A designation of 'not applicable' must be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition that applies to an activity that has not yet commenced.

3.0 Audit Findings

Table 3 displays the Audit Conditions and Compliance status. Conditions 1 through 8 of EPBC 2014/7126 yielded a total of 20 items to confirm compliance against.

3.1 Compliance with conditions.

Of the 20 audit items, seven were assessed as 'Compliant', 13 were assessed as 'Not Applicable', and no 'Non-compliance' with conditions of EPBC 2014/7126 were identified during the audit period.

Table 3: Audit Findings over the Audit Period

EPBC Referral Condition Number	Condition	Timing	Evidence	Compliance Status
(1)	The approval holder must not clear more than 38.7 hectares of Carnaby's Black-Cockatoo and Forest Red-tailed Black Cockatoo foraging and potential breeding habitat within the project area identified as the 'Proposal Area'.	Ongoing.	2018/2019 ACR reports 14.5 ha of Black Cockatoo habitat clearing under EPBC2014/7126. 2019/2020 ACR reports totals 4.04 ha of Black Cockatoo habitat clearing for period. Note: this clearing occurred in the previous reporting period (see Item 3 (a)) but is included in this reporting period. 2020/2021 Clearing report shows 8.64 ha of Black Cockatoo habitat cleared under EPBC 2014/7126 2021/2022 clearing records show 5.53 ha of Black Cockatoo habitat clearing under EPBC 2014/7126. Clearing of approximately 1.7 ha occurred within the Western Power easement which is outside the scope of the audit and not included in the total clearing number. 2022/2023 no clearing undertaken. 2023/2024 no clearing undertaken. 2024/2025 clearing records show 0.65 ha of Black Cockatoo habitat clearing under EPBC 2014/7126. 2025/2026 spatial data verified by SLR shows 4.54 ha of Black Cockatoo habitat clearing under EPBC 2014/7126. All of this clearing was within Stages 15 and 16 (September 2025). Clearing south of the Peel Main Drain (January 2026) was outside the mapped habitat (Section 2.2 and Appendix C). Total Clearing – 37.89 ha of the approved 38.7 ha (0.81 ha remaining).	Compliant
(2)(a)	To offset the loss of Carnaby's Black-Cockatoo and Forest Red-tailed Black-Cockatoo foraging habitat and potential breeding habitat, within twelve months from the date of this approval, the approval holder must provide the Department with written evidence that funds have been provided to DPAW for the acquisition and management of two environmental offset properties that must be: No less than 154 hectares in size, in the Shire of Gingin, Western Australia; and No less than 34 hectares in size at Lot 1143, Wye Road, Nannup, Western Australia.	Within 12 months from date of approval (30 July 2015).	This condition was met in a previous reporting period.	NA
(2)(b)	The written evidence must include a description and map clearly defining the location and boundaries of the offset properties and be accompanied with the offset attributes and a shapefile.	Within 12 months from date of approval (30 July 2015).	This condition was met in a previous reporting period.	NA
(2)(c)	The approval holder must also inform the Department how much of these offset properties will remain unattributed to this action for the purpose of supplying offsets for potential future project.	Within 12 months from date of approval (30 July 2015).	This condition was met in a previous reporting period.	NA
(3)(a)	To avoid and mitigate impacts to the Carnaby's Black-Cockatoo and Forest Red-tailed Black-Cockatoo, if clearing is to be undertaken during the breeding season (July – November), within 7 days prior to clearing, the approval holder must investigate potential breeding trees within the project area to detect the presence of Carnaby's Black Cockatoos or Forest Red-tailed Black - Cockatoos using hollows. The investigation must be undertaken by a suitable qualified and experienced person.	When clearing occurs between July and November, investigation of potential breeding trees must occur within seven days of clearing taking place.	Clearing of Stages 15 and 16 on 18, 19 and 22 September 2025 occurred during the breeding season (July – November). Dr Scott Thompson investigated potential breeding trees on 17 September 2025, within 7 days prior to clearing. Dr Thompson is suitably qualified and experienced for this assessment (Terrestrial Ecosystems, 2025) (Appendix A).	Compliant

EPBC Referral Condition Number	Condition	Timing	Evidence	Compliance Status
			No Black-Cockatoos were recorded breeding on site and no hollows with nesting Black-Cockatoos were identified (Terrestrial Ecosystems, 2025). Clearing south of the Peel Main Drain on 19 January 2026 occurred outside the breeding season. A pre-clearing inspection was still completed and no notable hollows were found (Terrestrial Ecosystems, 2026) (Appendix B).	
(3)(b)	If a Carnaby's Black-Cockatoo and Forest Red-tailed Black-Cockatoo is detected using a hollow in a tree or trees, the approval holder must: Clearly identify the tree or trees with fencing and signage Not clear the tree or trees Undertake measures to avoid the tree or trees from being cut down, felled, removed, killed, destroyed, poisoned, ring-barked, uprooted or burned. until the hollow/s are no longer being used by the Carnaby's Black-Cockatoo and Forest Red-tailed Black-Cockatoo as determined by a suitably qualified and experienced person.	When clearing occurs between July and November, investigation of potential breeding trees must occur within seven days of clearing taking place.	As above. No Black-Cockatoos were detected using a hollow in the project area for either clearing event (Terrestrial Ecosystems, 2025; Terrestrial Ecosystems, 2026) (Appendix A and Appendix B): • Stages 15 and 16 clearing (18, 19 and 22 September 2025) • Clearing south of the Peel Main Drain (19 January 2026)	Compliant
(4)	Within 30 days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement.	Within 30 days after the commencement of the action (20 September 2018).	This condition was met in a previous reporting period.	NA
(5)(a)	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval and make them available upon request to the Department.	Ongoing.	Accurate records of activities associated with or relevant to the conditions of the approval have been maintained. No requests were made by the Department during the audit reporting period.	Compliant
(5)(b)	Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act or used to verify compliance with the conditions of approval.	As required.	Not required.	NA
(5)(c)	Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	As required.	Not required.	NA
(6)(a)	Within three months of every 12-month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of this approval over the previous 12 months.	Within three months of every 12-month anniversary of commencement.	2024/2025 ACR published on the Apsley Estate website on 4 November 2025. Annual Compliance Report (EPBC 2014/7126)	Compliant
(6)(b)	Documentary evidence providing proof of the date of publication must be provided to the Department at the same time as the compliance report is published.	On the day, the compliance report is published.	Email evidence sighted of the notification of the compliance report publication to the Department on 4 November 2025.	Compliant
(6)(c)	The compliance reports must remain on the website for 12 months from the date of publishing.	For 12 months from the date of publishing.	2024/2025 ACR sighted as available on QUBE Apsley website 12 months on from the date of publishing, 4 November 2025. Annual Compliance Report (EPBC 2014/7126)	Compliant
(6)(d)	Potential or actual contraventions of the conditions of the approval must be reported to the Department in writing within two business days of the approval holder becoming aware of the actual or potential contravention. All contraventions must also be included in the compliance reports.	Within two business days of being aware of a potential or actual contravention.	No contraventions reported or noted as part of the ACR process.	NA
(6)(e)	Unless otherwise agreed to in writing by the Minister, the approval holder must provide a copy of each compliance report to members of the public upon request.	As required.	No requests made during audit reporting period. The ACR is available to the public for download on QUBE Apsley website.	NA
(6)(f)	Copies must be provided free of charge as soon as reasonably practicable but within no longer than 7 days of the request.	Within seven days of a request.	No requests made during audit reporting period. The ACR is available to the public for download on QUBE Apsley website.	NA

EPBC Referral Condition Number	Condition	Timing	Evidence	Compliance Status
(7)(a)	Upon the direction of the Minister, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted, and a report submitted to the Minister.	As required.	No requests made during audit reporting period.	NA
(7)(b)	The independent auditor must be approved by the Minister prior to the commencement of the audit.	As required.	NA	NA
(7)(c)	Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.	As required.	NA	NA
(8)	If, at any time after five (5) years from the date of this approval, the approval holder has not commenced the action, then the approval holder must not commence the action without the written agreement of the Minister.	Five years from approval date.	This condition was met in a previous reporting period.	NA

4.0 Recommendations and Conclusions

This Annual Compliance Report for EPBC 2014/7126 QUBE Property Group, Lot 682 Rowley Road, Mandogalup, has found the proponent to be in compliance with the conditions of the approval document. A total of 20 items were checked for compliance with the approval. Of these, thirteen were not applicable, and the remaining seven items being considered compliant with the approval conditions during the 2025/2026 reporting period. It is considered that the proponent, QUBE Property Group, is in compliance with the conditions granted in the EPBC 2014/7126 approval.

Cumulative clearing is now 37.89 ha of the approved 38.7 ha, leaving 0.81 ha. It is recommended that QUBE checks the extent of any proposed clearing against the remaining 0.81 ha before works start. Verified spatial data should be captured for each clearing event.

References

Department of Climate Change, Energy, the Environment and Water (DCCEEW) 2023, *Annual Compliance Report Guidelines,* Canberra. CC BY 4.

Terrestrial Ecosystems. (2025). *Fauna Management for Stages 15 and 16 of the Apsley Development.* Ref. 2021-0072-002-gf V2. Prepared for QUBE.

Terrestrial Ecosystems. (2026). *Terrestrial vertebrate fauna salvage program for the Apsley project area.* Ref. 2025-0220-002-tr. Prepared for Qube Property.

Appendix A Stages 15 and 16 Fauna Report (Terrestrial Ecosystems, 2025)

Annual Compliance Report (EPBC 2014/7126)

Lot 682, Rowley Road, Mandogalup

QUBE Property Group

SLR Project No.: 675.073525.00001

27 September 2025

TERRESTRIAL ECOSYSTEMS

2021-0072-002-gf V2

27 September 2025

Matt Cousins
Development Manager
QUBE
Suite 3, Level 1, 437 Roberts Rd
Subiaco, WA 6008

Re: Fauna Management for Stages 15 and 16 of the Apsley Development

Dear Matt

Terrestrial Ecosystems is pleased to provide the results of the fauna trapping and management program for Stages 15 and 16 of the Apsley Development.

Terrestrial Ecosystems undertook a 7-night trapping program from 4-11 September 2025. The trapping program utilised baited cage traps, aluminium box traps and pit traps and funnel traps supported by drift fences. All traps were checked and cleared daily from first light.

Dr Scott Thompson assessed the area scheduled for vegetation clearing to determine its potential for supporting nesting by Black-Cockatoos. No Black Cockatoos were recorded breeding on site, and no hollows were identified that had nesting Black Cockatoos. The Black-Cockatoo assessment was completed on 17 September 2025, and Dr Thompson is appropriately experienced and qualified for this assessment.

All native vertebrate fauna were caught and relocated under a Department of Biodiversity, Conservation and Attractions, Regulation 28 licence #FR28000102.

Vegetation clearing was undertaken on 18-19 and 22 September 2025. A combination of staff, including Dr Scott Thompson, Griffin Lam, Tom Raymond and Michael Walsh, completed the trapping and fauna management. Fauna caught and relocated are shown in Table 1, and images of some of these animals and the vegetation clearing program are provided below.

Please do not hesitate to contact the undersigned on 0407 385 239 or Dr Graham Thompson (0438 491 227) should you have any queries.

Yours faithfully

S Thompson

Dr Scott Thompson
Director and Principal Zoologist

Disclaimer

This document is prepared in accordance with and subject to an agreement between Terrestrial Ecosystems and the client, Qube Mandogalup Development Pty Ltd. It has been prepared and is restricted to those issues that have been raised by the client in its engagement of Terrestrial Ecosystems and prepared using the standard of skill and care ordinarily exercised by environmental scientists in the preparation of such reports.

Persons or agencies that rely on or use this document for purposes or reasons other than those agreed by Terrestrial Ecosystems and its client without first obtaining prior consent, do so at their own risk and Terrestrial Ecosystems denies all liability in tort, contract or otherwise for any loss, damage or injury of any kind whatsoever (whether in negligence or otherwise) that may be suffered as a consequence.

Table 1. Fauna caught during the trapping and salvage program

Species	Common Name	Total # individuals
Cryptoblepharus buchananii	Fence Skink	3
Ctenotus fallens	West-coast Ctenotus	3
Hemiergis quadrilineata	Two-toed Earless Skink	7
Helioporus eyrei	Moaning Frog	3
Litoria moorei	Motorbike Frog	2
Menetia greyii	Common Dwarf Skink	1
Mus musculus	House Mouse	4
Pogona minor	Bearded dragon	1
Tiliqua rugosa	Bobtail	3



Plate 1. ***Pogona minor***



Plate 2. ***Helioporus eyrei***



Plate 3. ***Menetia greyii***



Plate 4. ***Helioporus eyrei***



Plate 5. ***Tiliqua rugosa***

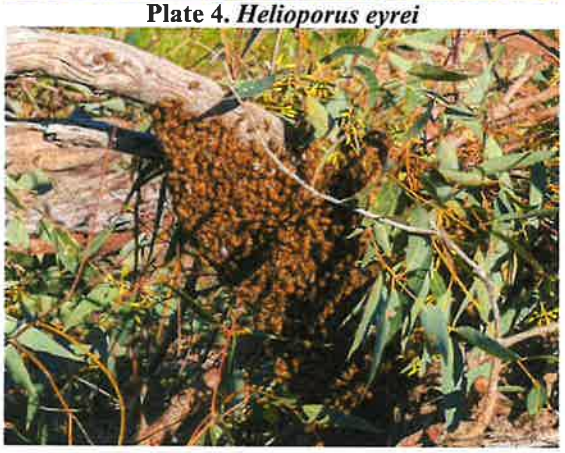


Plate 6. Bees



Plate 5. Vegetation clearing



Plate 6. Vegetation clearing

Appendix B Post-Clearing Fauna Report (Terrestrial Ecosystems, 2026)

Annual Compliance Report (EPBC 2014/7126)

Lot 682, Rowley Road, Mandogalup

QUBE Property Group

SLR Project No.: 675.073525.00001

24 January 2026

TERRESTRIAL ECOSYSTEMS

Ref: 2025-0220-002-tr

24 January 2026

Michael Mignacca
Assistant Development Manager
Qube property
Suite 3, Level 1, 437 Roberts Road,
Subiaco WA 6008

Re: Terrestrial vertebrate fauna salvage program for the Apsley project area

Dear Michael

Terrestrial Ecosystems is pleased to provide a report on the vertebrate fauna inspection and management program during vegetation clearing for the Apsley project area

All site works were undertaken in accordance with Terrestrial Ecosystems' Regulation 28 Licence (FR28000102) that was issued by the Department of Biodiversity, Conservation and Attractions, which authorises the capture and release of fauna.

Dr Scott Thompson undertook a site inspection to ensure no Black Cockatoos were nesting before the vegetation clearing program.

Zoologist Tom Raymond was on site on 19 January 2026. Tom undertook a further site inspection and habitat assessment for vertebrate fauna of conservation significance or anything that might be considered unusual or requiring special attention before trees were knocked down. No notable hollows were located, and one inactive nest was seen high in a tree.

The trees and the nest were re-examined once on the ground; no fauna were recorded and the nest was empty.

Plates 1-6 show images of some of the vegetation clearing.

Please do not hesitate to contact the undersigned (0407 385 239), if you require any further information.

Yours sincerely



Dr Scott Thompson
Director and Principal Zoologist



Plate 1. Site pre-clearing



Plate 2. Site pre-clearing



Plate 3. Clearing



Plate 4. Clearing



Plate 5. Post-clearing



Plate 6. Post-clearing

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Appendix C Black Cockatoo Foraging Habitat Clearing (SLR, 2026)

Annual Compliance Report (EPBC 2014/7126)

Lot 682, Rowley Road, Mandogalup

QUBE Property Group

SLR Project No.: 675.073525.00001

November 2026

Black Cockatoo Foraging Habitat Clearing 2025-2026



10/11/2026, 10:07:46 am

BC Foraging Habitat Clearing 2025-2026

Vegetation Clearing Extent 2025-2026

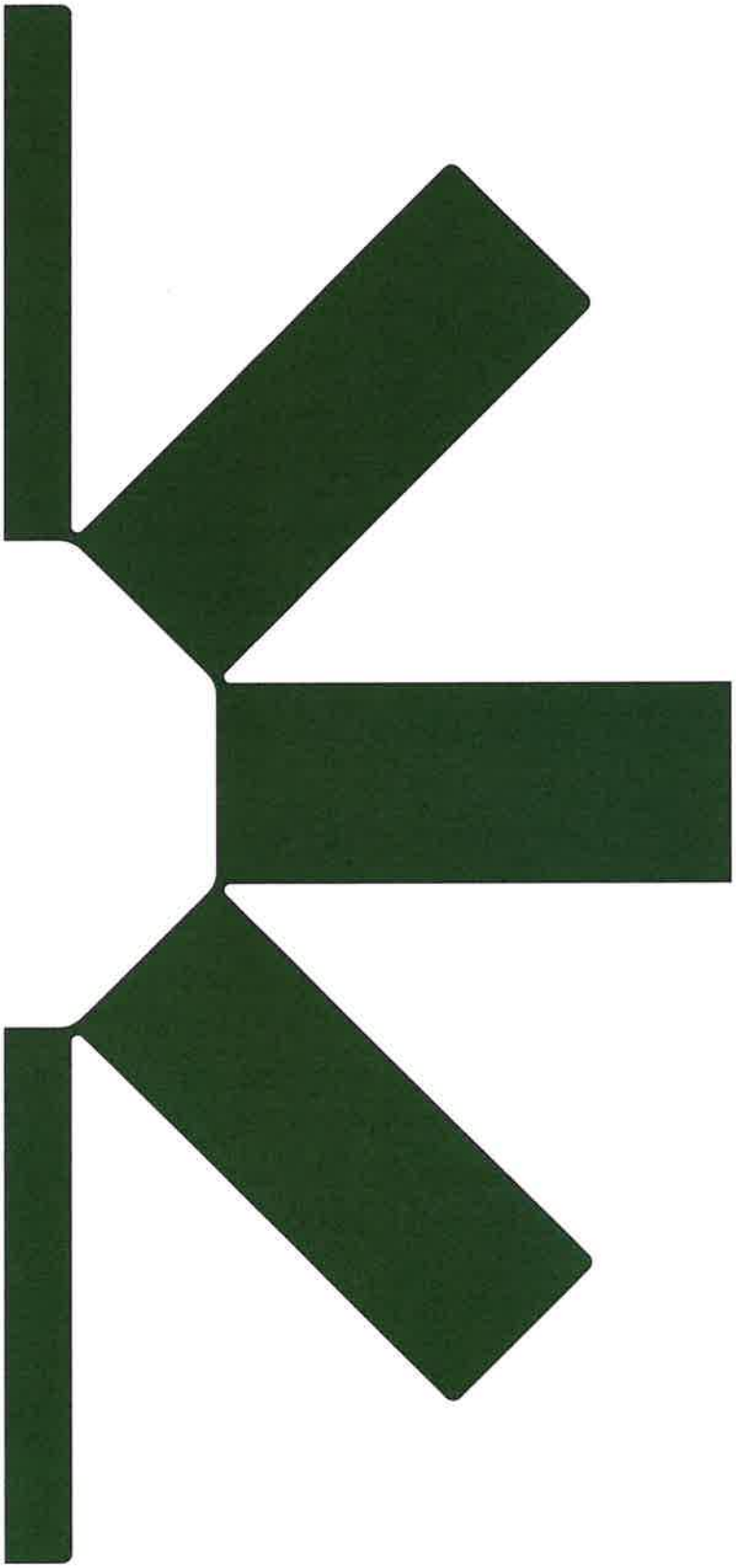
EPBC Approval - Mapped BC Foraging Habitat

1:3,767

0 220 440 880

0 85 130 260 m

SLR Consulting Australia Pty Ltd 2026



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