

# **BENDIGO OPHIR GOLD PROJECT**

## **RFI 11 QUESTION 11 ECOLOGY MEASURES OF SUCCESS FOR REHABILITATION OF CUSHIONFIELDS AND SPRING ANNUALS**

**(Robyn Simcock -MWLR/BSI August 2026)**

High-level feedback to CODC from Mike Harding

### **Consensus Expert Opinion**

- The letter states (page 1) that the “consensus expert position reflects the state of knowledge summarised in the B.16 Applied Research Plan for Conservation Management, Rehabilitation and Expansion of Cushionfield submitted as part of the Substantive Application”. That statement is presumptuous. The ARP presents a well-informed expert analysis but does not necessarily present a consensus. The statements which most closely represent consensus are those in the BOGP Joint Witness Statements for vegetation and ecology.

### **Spring Annuals Success Criteria**

- The proposed success criteria assume that future surveys (Spring 2026) will identify additional populations of *Ceratocephala pungens* outside the DDF. There is no certainty that additional populations will be found, nor the extent or number of those populations.
- MGL do not propose to undertake further surveys within the DDF<sup>1</sup>, even though substantial parts of the DDF have not yet been adequately surveyed. Therefore, it is not known what number of new sub-populations must be established ensure no net loss.
- The letter proposes (page 2) to change Criterion 1 from a “net 50% increase” to “increase the net number” of sub-populations. The justification for this change is the likelihood that additional populations will be found outside the DDF in Spring 2026 (page 3). That change will most likely reduce the number of sub-populations required to be established. Both measures rely on adequate data of existing populations within the DDF and the wider Consent Area. Those data are not yet available.
- It is unclear whether Criterion 2 (ex-situ/nursery propagation and establishment) includes successful establishment on site (in the ESA). There is a big difference between raising plants in a nursery and successfully establishing plants in the wild. There is considerable uncertainty about the latter.<sup>2</sup>

### **Cushionfield Success Criteria**

- The letter proposes that ‘shrubland’ and ‘tussockland’ will be included in the cushionfield definition because these vegetation types (as presently mapped) include areas of cushionfield. The mapped vegetation types are too broad to be useful for measuring change. Cushionfield should be clearly defined (using an accepted method) and its extent precisely mapped, prior to finalisation of success measures (and therefore consent conditions).
- The letter proposes to measure change in the extent of cushionfield by monitoring the 2m x 2m plots within the 10m x 10m Biodiversity Outcome Management Plan plots. That is inadequate. The baseline extent of cushionfield should be mapped and changes to that extent measured.

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<sup>1</sup> RFI 11 Question 11b Ecology Response (MGL), page 3.

<sup>2</sup> JWS Ecology-Effects Management, 10-11 June, para 22; JWS Terrestrial Vegetation, 2-3 June, para 15.

- The letter proposes that a “cushionfield condition score will be developed under the Applied Research Plan” (page 5). That is unsatisfactory. If the cushionfield score is part of the success criteria – as proposed – it should be finalised now, so that it can be described in the Consent Conditions.

#### **Lack of Adequate Baseline Data for Spring Annuals or Cushionfield**

- The proposed success criteria are measured against the existing known populations of the spring annual species. That knowledge is constrained by the limited geographic and temporal scope of the existing survey data. We do not yet know the full extent of the locations of populations (including within the DDF) nor the population numbers of the spring annual species.
- Baseline data on the extent of cushionfield are also inadequate. The existing mapped vegetation types do not accurately identify the extent of cushionfield. Nor is cushionfield clearly defined.
- The limitations of the spring annuals and cushionfield data mean that the proposed measures for success include outcomes that will be impossible to accurately measure. Consent Conditions based on those outcomes will be unenforceable.

Mike Harding

25<sup>th</sup> August 2026