

APPENDIX A

Submissions and comments

We have consulted with DELWP, the local councils and TfN and we considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the agency head.

Responses were received as follows:

DELWP	34
Baw Baw.....	39
Campaspe	41
Nillumbik.....	43
Yarra Ranges.....	45



Department of Environment,
Land, Water and Planning

PO Box 500, East Melbourne,
Victoria 8002 Australia
delwp.vic.gov.au

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31, 35 Collins Street
MELBOURNE VIC 3000

Ref: SEC015553



Dear Mr Greaves

**VAGO - PROPOSED REPORT - OFFSETTING NATIVE VEGETATION LOSS ON PRIVATE LAND
AUDIT**

Thank you for your letter of 7 April 2022 providing the Department of Environment, Land, Water and Planning (DELWP) with the opportunity to comment on the proposed performance audit report – Offsetting Native Vegetation Loss on Private Land.

Please find attached DELWP's response to the recommendations in the report and the actions DELWP proposes to take, including expected completion dates to address these. DELWP has either accepted or accepted in principle each of the recommendations made in the report. The actions that will respond to the recommendations will build on the significant improvements that DELWP has already made to the way native vegetation removal is regulated in Victoria. Many of the actions identified are in progress or were already proposed to be incorporated within DELWP's forward workplan.

While DELWP accepts or accepts in principle each of the audit reports recommendations, DELWP considers that some of the audit report's criticisms of its native vegetation tools could have better recognised the scientific and practical limitations to some findings. DELWP acknowledges that there are threatened species that do not currently have habitat distribution models (HDMs) that can be used to identify potential offset requirements. While a fully comprehensive set of models would be desirable, this is not always feasible. For example, some species are cryptic and difficult to observe, which means it is not feasible to identify sufficient data points to use as the basis of a habitat distribution model. In some cases, HDMs are not required for certain species where the full extent of occupied habitat is already known. In these cases, point locations are used in decision making instead of HDMs. DELWP continues to collect survey data and update models where the new information warrants this.

DELWP will engage with relevant stakeholders to identify a suitable approach for making periodic updates to HDMs and native vegetation tools based on improved information and understanding of the extent and location of native vegetation, including threatened species. DELWP will then develop a risk-based approach to preparing HDMs for those species that do not currently have models and would benefit from having such models.

DELWP does not agree with the audit report's statement that there is confusion about the number of offset sites recorded on the credit register, the land area of those sites or the number of offset credits available for trading from those sites. DELWP acknowledges that process controls for the native vegetation credit register could be improved and notes the audit did not identify any current instances of oversubscription.

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While DELWP has the overall responsibility for the policy and legislative framework for native vegetation removal, implementation is shared primarily with local government. DELWP recognises the challenges that local governments face in implementing the regulations and has already put in place numerous mechanisms to support them in their role. DELWP will continue to engage with local government to further understand key barriers to effective implementation and where DELWP can provide further support.

If you would like more information about this matter, please contact James Todd, Executive Director Biodiversity Division, DELWP on 0407 325 102 or email james.todd@delwp.vic.gov.au.

Thank you again for your audit report.

Yours sincerely



John Bradley
Secretary

26 / 04 / 2022

Encl

Offsetting Native Vegetation Loss on Private Land performance audit

DELWP's Management Action Plan

Recommendations	Agreed Action	Completion Date
Recommendation 1 1. Improve its native vegetation reporting by: <ul style="list-style-type: none"> reporting directly on the no-net-loss policy objective, specifically on net habitat hectares gained or lost as a result of native vegetation clearing on private land consulting and working with relevant stakeholders to obtain the most recent and comprehensive information on the extent and location of Victorian native vegetation, including threatened species reviewing its Monitoring, Evaluation and Reporting Plan 2019 to identify relevant data it needs to collect and manage to enable accurate and reliable reporting on a balance of outcome, output and process measures. (See Sections 2.1 and 2.2). 	Accepted in principle DELWP has updated its annual No Net Loss Report for the 2020-21 financial year to include quantitative data on the extent of losses and gains in the biodiversity metrics (hectares, large trees, general/specific biodiversity units) applied under the <i>Guidelines for the removal, destruction or lopping of native vegetation</i> . DELWP will investigate if there are further quantitative indicators that can be used to better report against whether the no net loss objective is being achieved, and incorporate any appropriate indicators within future reports (commencing 2022-23 financial year). DELWP will include data on the extent (hectares) of illegal clearing in future no net loss reports (commencing 2022-23 financial year), where that can be reasonably identified based on information available. DELWP will engage with relevant stakeholders to review existing available information and identify options to obtain new information to support improved understanding of the extent and location of native vegetation, including threatened species. Based on the outcomes of this consultation, DELWP will develop a risk-based approach to preparing habitat distribution models for those species that do not currently have models. DELWP will also consider if information that identifies co-location of species that do not currently have models with those that do can be better incorporated into its native vegetation removal tools. DELWP will update the Monitoring, Evaluation and Reporting Plan to identify data required to report on outcome, output and process measures.	1 July 2024
Recommendation 2 2. Develop and implement a data management protocol to ensure the currency and completeness of its native vegetation tools and datasets, including its calculator and offset credit register, by: <ul style="list-style-type: none"> establishing and implementing a process to regularly review and update its native vegetation tools and datasets 	Accepted DELWP will review and update procedures and user manuals for its native vegetation tools and data sets and credit register, including further testing and assessing against the Department of Premier and Cabinet's <i>Data Quality Guidelines—Information Management Framework</i> . DELWP has commenced a review of the credit register to ensure that its data is up to date and accurate. This will include examining and	1 July 2023



Environment,
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Offsetting Native Vegetation Loss on Private Land

Recommendations	Agreed Action	Completion Date
<ul style="list-style-type: none"> testing and assessing its data and processes against the Department of Premier and Cabinet's Data Quality Guidelines— Information Management Framework conducting a comprehensive inventory review of its offset sites' data, including but not limited to available offset credits at the time of site establishment, offset credit transactions and remaining offset credits available reviewing its requirements for and revising/upgrading the information management system/platform that houses its credit register datasets developing and implementing a process in the credit register that includes sufficient controls to maintain data security and integrity, including but not limited to appropriate user access, separation of user duties, preventing oversubscription, and compliance with the Department of Premier and Cabinet's Data Quality Guidelines— Information Management Framework (See Section 2.3) 	<p>implementing changes to improve data security, accuracy and integrity controls.</p> <p>DELWP will train additional staff in the use and controls of the credit register to buffer staff absence.</p>	
<p>Recommendation 3</p> <p>3. improve its oversight and monitoring of the extent of native vegetation clearing across the state by:</p> <ul style="list-style-type: none"> using analytic tools such as spatial imagery programming its native vegetation offset calculator to better track and identify council-approved native vegetation permits. (See Section 3.1). 	<p>Accepted in principle</p> <p>DELWP already produces the Victorian Land Cover Time Series dataset, which provides valuable insights into land cover changes across the state. DELWP will consider how this can be used or revised to assist in analysing and investigating potential unauthorised clearing.</p> <p>DELWP has begun exploring additional options, including satellite imagery, to improve monitoring of the extent of native vegetation removal across the state. DELWP will produce a report that outlines options, costs and anticipated operational processes to better utilise analytical tools, and will consult with local government on the feasibility of using such tools to improve enforcement activities.</p> <p>DELWP will continue to work with responsible authorities to improve processes to collect data on approved permits for native vegetation removal. DELWP will investigate options for incorporating a report back function from responsible authorities that enables confirmation of what has been approved by a planning permit to be captured within NVIM and EnSym. Data collected will be spatially recorded by DELWP.</p>	1 July 2024
<p>Recommendation 4</p>	<p>Accepted</p>	1 July 2024

Offsetting Native Vegetation Loss on Private Land

Recommendations	Agreed Action	Completion Date
<p>4. review and improve its management of offset sites by</p> <ul style="list-style-type: none"> ensuring owners of section 69 third-party offset sites continue to undertake proper maintenance works—beyond the first 10 years of their establishment—to preserve the sites' offset gains clarifying and ensuring that management plans are in place for offset sites transferred to the Crown. (See Section 3.2). 	<p>DELWP will prepare a guidance note clearly outlining the system it has developed to monitor the implementation of maintenance works for section 69 offset sites beyond ten years. This will be published on the DELWP website. DELWP will also write to all landowners who have or are about to reach relevant milestones to remind them of their obligations and provide them with a copy of the guidance note.</p> <p>DELWP will write to offset owners to remind them two months prior to their reporting due date and follow up with reminders and compliance actions if reporting and management requirements are not met.</p> <p>DELWP has already committed to creating a framework for offsetting on Crown land, which will include in-perpetuity security arrangements and measures that ensure management actions are in addition to statutory requirements for management of Crown land. This will include entering into a memorandum of understanding for each Crown land offset site with the land manager.</p>	
<p>Recommendation 5</p> <p>5. DELWP, Baw Baw Shire Council, Campaspe Shire Council, Nillumbik Shire Council and Yarra Ranges Shire Council work together and consult with other councils and stakeholders to:</p> <ul style="list-style-type: none"> confirm the root causes for non-compliance with native vegetation regulations determine the staff resources, budget resources, policy, project, reporting, legislative requirements and intervention required to effectively address the state's native vegetation issues develop guidance documentation clarifying how councils must apply the mitigation hierarchy in assessing applicants to ensure that councils approve the removal as a last resort after avoidance and minimisation. (See Section 3.2) 	<p>Accepted in principle</p> <p>DELWP has developed a Compliance Strategy to support local government's implementation of the native vegetation removal regulations. This strategy includes steps that councils can take to identify specific causes for non-compliance in their area and develop tailored compliance approaches to tackle these.</p> <p>DELWP currently participates in the Municipal Association of Victoria's (MAV) Native Vegetation Compliance Community of Practice. DELWP will continue to work with MAV and councils to determine the main overarching causes of non-compliance with the regulations.</p> <p>DELWP, through the Community of Practice, will investigate resources required to address native vegetation issues by local government and identify any potential legislative amendments that could be made to support them.</p> <p>DELWP will clarify expectations regarding the avoid, minimise and offset hierarchy for applicants and responsible authorities:</p> <ul style="list-style-type: none"> Refresh the <i>Applicant's guide – Applications to remove, destroy or lop native vegetation</i> so it better focuses applicants' attention on avoiding/minimising impact to biodiversity values. Refresh guidance/training material for councils to better communicate expectations when considering the avoid, minimise and offset hierarchy. 	1 December 2023

Baw Baw Shire Council's action plan to address recommendations from *Offsetting Native Vegetation Loss on Private Land*

No.	VAGO recommendation	Action	Completion date
5	<p>Work together and consult with other Councils and stakeholders to:</p> <ul style="list-style-type: none"> Confirm the root causes for non-compliance with native vegetation regulations Determine the staff resources, budget resources, policy, project, reporting, legislative and intervention required to effectively implement the native vegetation regulations Review guidance documentation clarifying how councils must apply and independently verify the mitigation hierarchy in assessing applications to ensure that councils approve removal as a last resort after avoidance and minimisation (See Section 3.2) 	<p>Partially accepted Council is of the view that DELWP should be the lead agency to determine the root causes of non-compliance, given DELWP is the authority that compiled the State's Native Vegetation Framework</p> <p>Accepted in principle This recommendation would require Council to undertake a significant service review, which is currently not funded in Council's operating budget. Implementing this action would require Council to undertake a specific project, requiring external resource, to progress this. This would be subject to an allocation of funds in future budgets by Council, considering a range of other competing community priorities, and subject to the decision of the Council.</p> <p>Accepted Council already has this embedded in their existing processes.</p>	<p>N/A</p> <p>Subject to Council decision</p> <p>Complete</p>
6	<p>Develop controls and processes to effectively and consistently apply the mitigation hierarchy when processing permit applications, including by independently verifying that the proposed clearing is unavoidable or cannot be minimised (See Section 3.2)</p>	<p>Partially accepted Council already has this embedded in their existing processes. Council is of the view that DELWP need to provide further direction in the Native Vegetation Framework for those that are assessing permit applications to provide greater clarity on the objective assessment for the mitigation hierarchy. Currently the associated guidelines, provide limited direction for the assessment process.</p>	<p>Complete</p> <p>N/A</p>

7	<p>Develop and implement controls and processes to:</p> <ul style="list-style-type: none"> • Enable them to accurately identify, track and report on the permits with native vegetation requirements they issue, and unauthorised and exempted clearing in their areas of responsibility • Ensure permit holders secure the required offsets before removing native vegetation, remove vegetation consistent with permit conditions, and comply with their obligations under first-party offset agreements (See Sections 3.1 and 3.2) 	<p>Partially accepted</p> <p>Council already has controls and processes embedded in their existing practices to report on permits with native vegetation requirements.</p> <p>Based on current levels of resources Council does not have the capacity, both financial and resources, to inspect, monitor unauthorised and exempted clearings, noting that there is not a mechanism in the planning system for exempted clearing to be reported to Council, and monitoring unauthorised clearing across the Shire area of over 4,000sq.km would require significant skilled resources.</p> <p>Partially accepted</p> <p>Council already has this embedded in their existing processes.</p> <p>Council will consider developing an audit process that periodically reviews a sample of permits for permit compliance.</p>	<p>Complete</p> <p>2022/23FY</p>
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Campaspe Shire Council's action plan to address recommendations from Offsetting Native Vegetation Loss on Private Land

No.	VAGO recommendation	Action	Completion date
1	<p>5. Department of Environment, Land, Water and Planning, Baw Baw Shire Council, Campaspe Shire Council, Nillumbik Shire Council and Yarra Ranges Shire Council work together and consult with other councils and stakeholders to:</p> <ul style="list-style-type: none"> confirm the root causes for non-compliance with native vegetation regulations determine the staff resources, budget resources, policy, project, reporting, legislative requirements and intervention required to effectively implement the native vegetation regulations review guidance documentation clarifying how councils must apply and independently verify the mitigation hierarchy in assessing applicants to ensure that councils approve removal as a last resort after avoidance and minimisation. (See Section 3.2). 	<p>Accept.</p> <p>Campaspe Planning Department will be undertaking changes to the process (through its IT system) for ensuring landowners present ACE reports prior to removing vegetation.</p> <p>Campaspe has already amended the reporting to ensure that the assessment meets the Guidelines in relation to the three-step process.</p>	<p>May 2022</p> <p>April 2022</p>
2	<p>6. Campaspe Shire Council and Baw Baw Shire Council develop controls and processes to effectively and consistently apply the mitigation hierarchy when processing permit applications, including by independently verifying that the proposed clearing is unavoidable or cannot be minimised. (See Section 3.2).</p>	<p>Accept.</p> <p>The planning assessments already considered the mitigation hierarchy; improvements have been made to enhance the assessment about the mitigation hierarchy.</p>	<p>April 2022</p>

3	<p>7. Baw Baw Shire Council, Campaspe Shire Council, Nillumbik Shire Council and Yarra Ranges Shire Council develop and implement controls and processes to:</p> <ul style="list-style-type: none"> • enable them to accurately identify, track and report on the native vegetation permits they issue, and unauthorised and exempted clearing in their areas of responsibility. • ensure permit holders secure the required offsets before removing native vegetation, remove vegetation consistent with permit conditions, and comply with their obligations under first-party offset site agreements. (See Sections 3.1 and 3.2). 	<p>Accept.</p> <p>No notice was provided to Councils that annual data reports were going to be required. After the first report was manually completed Campaspe changed its data retention process in 2018-2019 to ensure the native vegetation permits and the included NVIM report number and extent were able to be retrieved added to the annual report automatically. Once a re-run the 2018 data automatically it was shown 3 permits were missed and revised information submitted with the next years annual report.</p> <p>This automated process has been further enhanced to include the offset report data is recorded when submitted and added to the annual report.</p> <p>Campaspe has processes in place to audit all planning permits within 2 years (except for the COVID period this is achieved).</p> <p>Changes have been made to the processes and IT improvements to ensure the native vegetation planning permit and auditing procedures and documents are clearer to the landowner to assist them to ensure compliance with the planning permit conditions. In addition we are investigating IT automation of alerts to audits.</p>	May 2022
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Nillumbik Shire Council's action plan to address recommendations from *Offsetting Native Vegetation Loss on Private Land*

No.	VAGO recommendation	Action	Completion date
1	<p>Department of Environment, Land, Water and Planning Baw Baw Shire Council, Campaspe Shire Council, Nillumbik Shire Council and Yarra Ranges Shire Council:</p> <p>work together and consult with other councils and stakeholders to:</p> <ul style="list-style-type: none"> confirm the root causes for non-compliance with native vegetation regulations determine the staff resources, budget resources, policy, project, reporting, legislative requirements and intervention required to effectively implement the native vegetation regulations review guidance documentation clarifying how councils must apply and independently verify the mitigation hierarchy in assessing applicants to ensure that councils approve removal as a last resort after avoidance and minimisation. (See Section 3.2). 	<p>Accept</p> <p>Actions:</p> <ol style="list-style-type: none"> Nillumbik will write a letter to the Minister for Planning seeking clearer guidance for addressing illegal veg removal; greater PIN penalty points and direction on how to offset illegal native veg removal. We will copy other peri-urban Councils into this letter. Nillumbik was one of two Councils found to be appropriately applying the mitigation hierarchy. This can be further refined by updating delegate report templates to include the 3 step hierarchy in the template of the report. 	<ol style="list-style-type: none"> 1 August 2022 to send letter. 1 July 2022 to update delegate report templates.
2	<p>Baw Baw Shire Council, Campaspe Shire Council, Nillumbik Shire Council and Yarra Ranges Shire Council:</p> <p>develop and implement controls and processes to:</p> <ul style="list-style-type: none"> enable them to accurately identify, track and report on the native vegetation permits they issue, and unauthorised and exempted clearing in their areas of responsibility. 	<p>Accept</p> <p>Actions:</p> <ol style="list-style-type: none"> We will develop a new register in our CRM (customer relationship management) system that will record all planning permits issued that have granted approval to remove native vegetation under Clause 52.17 of the Planning Scheme. This will allow Council to generate reports from the CRM to accurately report on the 	<ol style="list-style-type: none"> 30 September 2022 1 July 2022 n/a 1 October 2022 1 October 2022

	<ul style="list-style-type: none"> • ensure permit holders secure the required offsets before removing native vegetation, remove vegetation consistent with permit conditions, and comply with their obligations under first-party offset site agreements. (See Sections 3.1 and 3.2). 	<p>number of permits issued, including permit numbers.</p> <ol style="list-style-type: none"> 2. Introduce a new code for enforcement matters specifically for planning scheme breaches under Cl.52.17, as opposed to coding for vegetation removal breaches generally. This will allow Council to generate reports from the CRM to accurately report the number of planning scheme breaches under Cl.52.17. 3. Council is unable to record and track the amount of native vegetation lawfully removed through planning scheme exemptions. The Victoria Planning Provisions are not written in a way that requires the customer to notify Council of exempt activities. 4. Implement bi-annual follow ups utilising the new native vegetation permit register (for permits issued under Cl.52.17) to track if permits have been activated. Spot check applications on site to check the amount of clearance to ensure it accords with the permit. 5. Establish a separate register for permits which establish first party offsets. Timing and inspections can be incorporated into the register with <i>system reminders</i>. 	
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Enquiries: Amanda Kern
Telephone No: 9294 6352
Position No: Manager Planning and Building

28 April 2022

Private & Confidential
Mr Andrew Greaves
Victorian Auditor General's Office
Level 31
35 Collins Street
Melbourne VIC 3000

Via email - vago_onv22@audit.vic.gov.au

Yarra Ranges Council

PO Box 105

Lilydale Vic 3140

DX 34051

Call 1300 368 333

Fax 03 9735 4249

mail@yarraranges.vic.gov.au

www.yarraranges.vic.gov.au



Dear Mr Greaves

Yarra Ranges Shire Council's action plan to address recommendations from *Offsetting Native Vegetation Loss on Private Land*

Thank you for providing Yarra Ranges Council with the proposed Performance Audit Report – Offsetting Native Vegetation Loss on Private Land.

Below is Council's response to the two recommendations within the report for action by Yarra Ranges Council to respond to. The detail indicates Council's acceptance of most of the recommendations, and its actions to implementing each of those accepted recommendations, including realistic timeframes to do so:

No.	VAGO recommendation	Action	Completion date
5	<p><i>Department of Environment, Land, Water and Planning, Baw Baw Shire Council, Campaspe Shire Council, Nillumbik Shire Council and Yarra Ranges Shire Council:</i></p> <p>Work together and consult with other councils and stakeholders to:</p> <ol style="list-style-type: none"> confirm the root causes for non-compliance with native vegetation regulations determine the staff resources, budget resources, policy, project, reporting, legislative requirements and 	<p>5a. Accepted – YRC will</p> <ol style="list-style-type: none"> seek advice from the Department and Minister for Planning on what the root causes are for non-compliance, Review and update its information available to the community to better inform of both the planning controls for native vegetation removal, and the penalties for breaches to deter inclination of some owners to breach the planning scheme rather than obtain approval, and advocate to the State for improvements to the enforcement and infringements system to get more efficient and effective mechanisms to remedy non-compliances as they occur to deter inclination of some owners to breach the planning scheme rather than obtain approval. <p>5b. Accepted in principle – YRC will</p>	<ol style="list-style-type: none"> 31 July 2022 31 December 2022 Ongoing

ABN 21 973 226 012

Yarra Ranges Shire Council

No.	VAGO recommendation	Action	Completion date
	<p>intervention required to effectively implement the native vegetation regulations</p> <p>c. review guidance documentation clarifying how councils must apply and independently verify the mitigation hierarchy in assessing applicants to ensure that councils approve removal as a last resort after avoidance and minimisation. (See Section 3.2).</p>	<p>i. seek advice from DELWP to understand the State's ability to support and provide data to monitor native vegetation removals within the Shire; and</p> <p>ii. review its resources, internal processes, policies, reporting and data collection, and proactive monitoring capabilities where practical to determine what its capacity is to make improvements to better meet its regulatory requirements.</p> <p>5c – No change required to meet recommendation—</p> <p>i. The report confirms YRC already completes the mitigation hierarchy as part of the consideration process and assessment process for planning permits. Continuous internal review of planning report templates and referral processes which may identify opportunity for refinement to ensure best practice is achieved.</p>	
7	<p><i>Baw Baw Shire Council, Campaspe Shire Council, Nillumbik Shire Council and Yarra Ranges Shire Council</i></p> <p>Develop and implement controls and processes to:</p> <p>a. enable them to accurately identify, track and report on the native vegetation permits they issue, and unauthorised and exempted clearing in their areas of responsibility.</p> <p>b. ensure permit holders secure the required offsets before removing native vegetation, remove vegetation consistent with permit conditions, and comply with their obligations</p>	<p>7a. Accepted - YRC will</p> <p>i. Review the ability for Council's current systems to more accurately capture permits issued for Native Vegetation removals.</p> <p>ii. introduce and design more comprehensive data collection mechanisms in its new corporate database system (Tech1 P&R) which is due be delivered and functional by December 2023 (go live date TBC);</p> <p>iii. Review its planning enforcement processes and permit auditing program to include proactive inspections of a proportion of Native Vegetation removal permits issued each year.</p> <p>However, 7a.iv is not accepted as</p> <p>iv. Council cannot monitor exempt vegetation removal, which is unfeasible and unachievable given there is no statutory or legislative reporting requirement for owners to advise or inform Council of activity to undertake lawfully exempt vegetation removal.</p> <p>7b. Accepted –</p>	<p>7a.i. – 30 September 2022</p> <p>7a.ii. – December 2023 (TBC)</p> <p>7a.iii. April 2023</p> <p>7a.iv. Not feasible with current legislation</p> <p>7b.i. In place</p> <p>7b.ii. April 2023</p>

Yarra Ranges Council

PO Box 105

Lilydale Vic 3140

DX 34051

Call 1300 368 333

Fax 03 9735 4249

mail@yarraranges.vic.gov.au

www.yarraranges.vic.gov.au



No.	VAGO recommendation	Action	Completion date
	under first-party offset site agreements. (See Sections 3.1 and 3.2).	<ul style="list-style-type: none">i. YRC already have a process to require offsets to be secured prior to approval of plans;ii. YRC will incorporate auditing of a proportion of first party offset sites into its proactive monitoring program outlined in 7iii above	

If you require anything further, please contact Amanda Kern, Manager Planning and Building on 9294 6352

Yours sincerely,



Tammi Rose
Chief Executive Officer

ABN 21 973 226 012
Yarra Ranges Shire Council

