



NEW HOPE
GROUP

Appendix I Biodiversity Offset Strategy





NEW HOPE
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BIODIVERSITY OFFSET STRATEGY

*New Acland Coal Mine Stage 3
Project*

JANUARY 2014



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1. Introduction

New Acland Coal Pty Ltd (NAC) has developed this Biodiversity Offset Strategy (the Strategy) in accordance with the *Queensland Biodiversity Offsets Policy 2011* (QBOP) and the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC) *Environmental Offsets Policy 2012* (EOP, for the construction of the revised New Acland Stage 3 Project (the revised Project).

The Strategy discusses the State and Federal offset requirements for the revised Project including:

- Policy requirements
- Offset approach
- Impacts on State significant biodiversity values
- Impacts on Federal threatened species and communities
- Proposed offsets for residual impacts on State significant biodiversity values
- Proposed offsets for residual impacts on Federal threatened species and communities
- Securing offsets
- Management of offsets

2. Policy Requirements

Two offset policies apply to the revised Project, at the State and Commonwealth levels. The offset requirements for the revised Project and each applicable policy have been assessed within this Strategy.

The offset policies to be considered for the revised Project are:

- *Environment Protection and Biodiversity Conservation Act 1999 Environmental Offset Policy 2012* (EPBC EOP)
- *Queensland Biodiversity Offset Policy 2011 Version 1* (QBOP)

2.1. EPBC EOP

The following has been extracted from the *Environment Protection and Biodiversity Conservation Act 1999 Environmental Offset Policy 2012*.

The use of offsets to compensate for adverse impacts to heritage values is appropriate in some circumstances. In cases where offsetting of adverse impacts on heritage values is considered possible and appropriate, the principles of this policy apply with regard to determining what constitutes a suitable offset. Offsets for impacts on heritage values should improve the integrity and resilience of the heritage values of the property involved. This may include offsets in areas adjacent to the property.

The EPBC Act environmental offsets policy has five key aims, to:

1. ensure the efficient, effective, timely, transparent, proportionate, scientifically robust and reasonable use of offsets under the EPBC Act
2. provide proponents, the community and other stakeholders with greater certainty and guidance on how offsets are determined and when they may be considered under the EPBC Act
3. deliver improved environmental outcomes by consistently applying the policy
4. outline the appropriate nature and scale of offsets and how they are determined
5. provide guidance on acceptable delivery mechanisms for offsets.

2.2. QBOP

The purpose of the QBOP is to increase the long-term protection and viability of the State's biodiversity where residual impacts from a development on an area possessing State significant biodiversity values cannot be avoided. The QBOP provides the framework to ensure that there is no net loss of biodiversity.

For the purposes of the QBOP, State Significant Biodiversity Values (SSBVs) have been derived from relevant values in the DEHP's Areas of Ecological Significance (**AES**) mapping and Biodiversity Planning Assessments (**BPA**).

The revised Project will need to provide an offset for impacts on State Significant Biodiversity Values in accordance with the *Queensland Biodiversity Offset Policy*. This requirement will be included in the revised Project's Environmental Authority (EA).

Impacts on SSBVs must not occur until the holder of the EA has provided a legally secured direct land based offset, or entered into a Deed of Agreement, with the administering authority for an offset transfer, consistent with the QBOP requirements for reporting on progress of securing the offset.

3. Offset Approach

3.1. Avoidance

In developing the revised Project following concerns raised by government and public stakeholders in relation to the original Project, NHG have considerably reduced its project footprint, including its potential impacts on threatened flora and fauna.

The revised Project includes a reduction in the active area of the MLA 50232 Project area from 5,069 hectares (ha) to 2027 ha. The revised Project avoids mining within Acland and includes a buffer zone along Lagoon Creek, where a revegetation program will be implemented over the life of the revised Project. Figure 2 sets out the revised Project's footprint.

Impacts on all ecological values have been avoided and minimised as far as practicable. The revised Project will use ongoing opportunities to further avoid impacts at a local scale through the detailed design and construction phases.

3.2. Residual Impacts

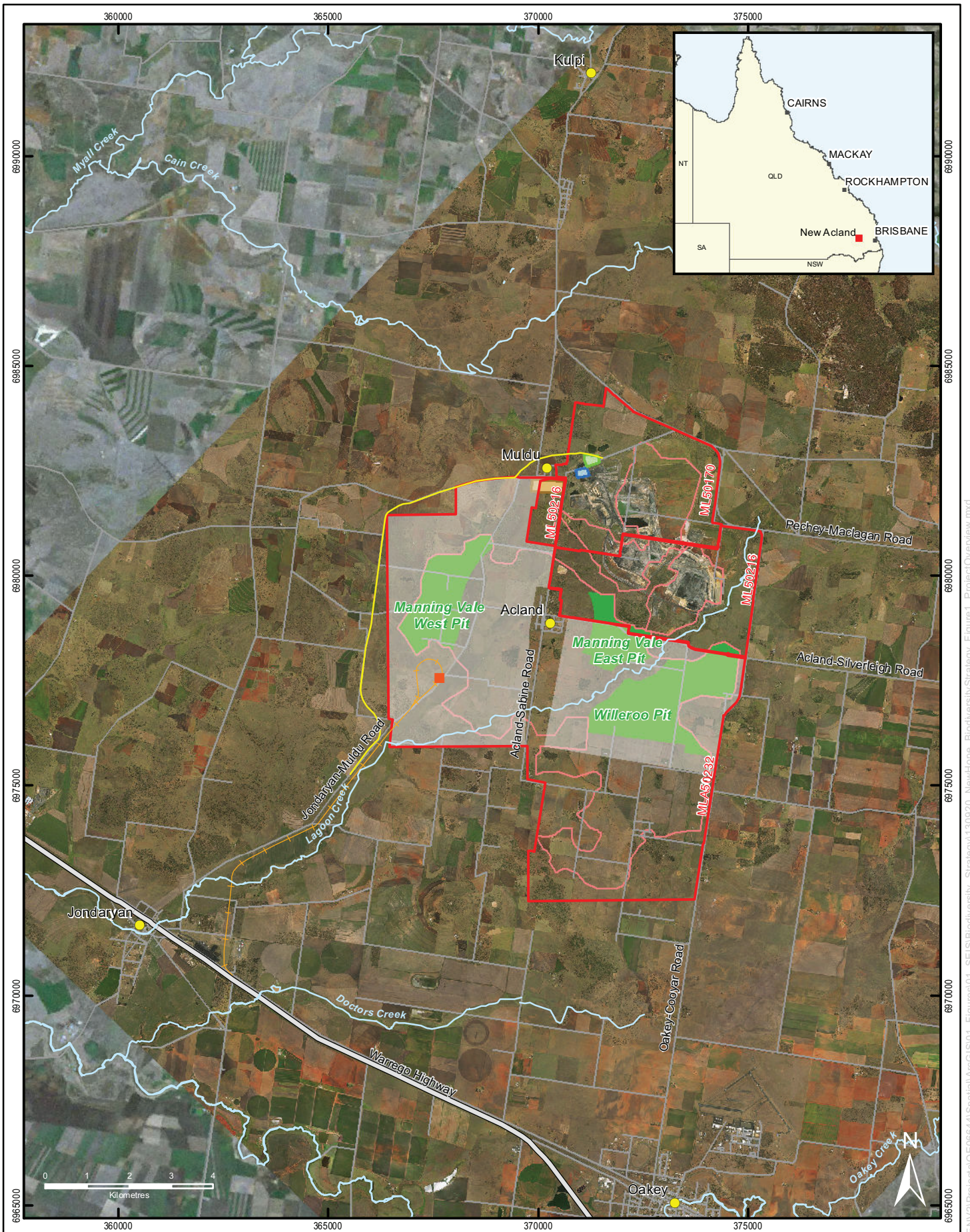
The revised Project will impact on Threatened Ecological Communities (TEC), Endangered and Of Concern Regional Ecosystems (REs), watercourses and threatened species (*Figure 2*). TECs are those communities listed as threatened under the Commonwealth's EPBC Act. REs are those vegetation communities in a bioregion that are consistently associated with a particular combination of geology, landform and soil. A community that is a TEC can correspond with an RE, but not necessarily.

The residual and unavoidable impacts resulting from clearing required for the revised Project will be offset in accordance with QBOP and EPBC EOP. The offsets proposed are intended to satisfy both policies, for example, one offset for Brigalow will satisfy both the QBOP and EPBC EOP requirements.

Residual impacts requiring offsets under EPBC EOP and QBOP have been calculated for the revised Project and verified using the EOP offset calculator. Where watercourses, as defined under the *Vegetation Management Act, 1999* (VMA) will be impacted upon by clearing, the area requiring offsetting has been calculated by applying the applicable buffers as per the regional vegetation management code and Department of Natural Resources and Mines (DNRM) stream order mapping. This buffer has been applied to the field verified vegetation mapping.

The Department of Environment and Heritage Protection (DEHP) Biodiversity Planning Assessment Mapping identifies regional corridors across the project area as seen in *Figure 3*. The value attributed to connectivity has been based on impacts on Endangered and Of Concern REs, watercourses and protected species within the corridor areas. Additionally, with the proposed mitigation measures for fragmentation, barrier effects and reduction in vegetation communities and habitats, the overall function of the corridors are not expected to be compromised or significantly impacted.

The impacts on flora and fauna protected under the EPBC and *Nature Conservation Act 1992* (NCA) that are classified and known to occur on the site have been included in this strategy. The offsets that are proposed under the EPBC EOP and QBOP provide a net environmental gain and cover all of the impacts assessable.



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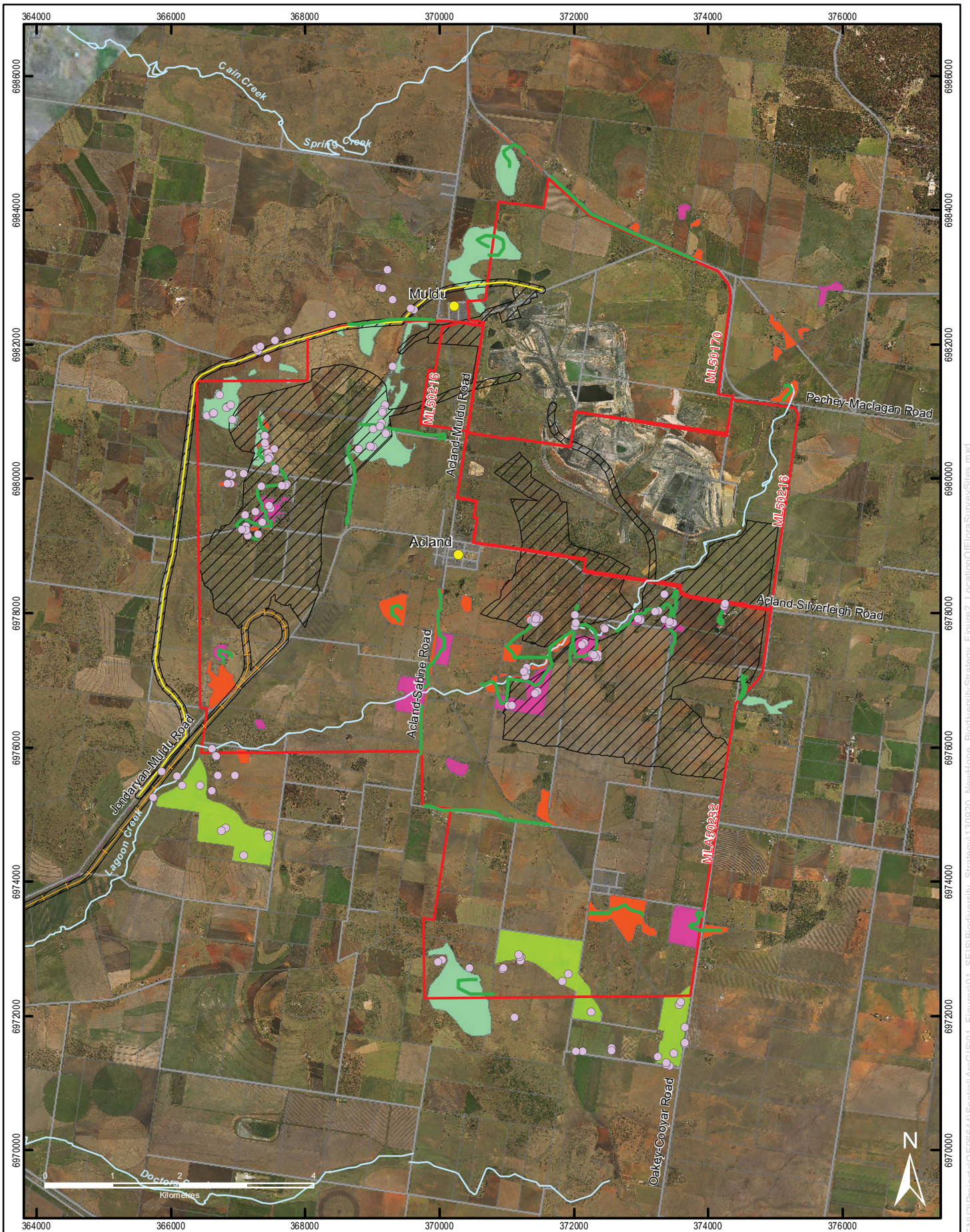
- Towns and Localities
- Train Loadout Facility
- Rail Spur
- Roads
- Creeks
- Jondaryan-Muldu Road Diversion
- Proposed Extent of Surface Rights Area
- Coal Resource Area
- Mining Tenements
- Stage 3 Pit Areas
- CHPP Precinct
- Material Handling Facility
- Mine Industrial Area



**NEW ACLAND COAL MINE
STAGE 3 PROJECT**

Figure 1 - Revised Project Overview

Scale 1:120,000 on A4
Projection: Australian Geodetic Datum – Zone 56 (AGD84)



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- | | | |
|-----------------------------------|---------------------------------------|-------------------------------------|
| ● Towns and Localities | ▭ Cadastre | Observed Regional Ecosystems |
| ● Vegetation & Biocondition Sites | ▭ Mining Tenements | ■ Endangered |
| — Flora Transects | ▨ Disturbance Footprint Area | ■ Of Concern |
| — Rail Spur | ▭ Proposed Bluegrass Offset Locations | ■ Least Concern |
| — Roads | | |
| — Creeks | | |
| — Jondaryan-Muldu Road Diversion | | |



**NEW ACLAND COAL MINE
STAGE 3 PROJECT**

**Figure 2 - Location of
Flora Survey Sites**

Scale 1:75,000 on A4
Projection: Australian Geodetic Datum – Zone 56 (AGD84)

4. Impacts on State significant biodiversity values

The revised Project will have an impact on the following State significant biodiversity values:

- remnant endangered regional ecosystems;
- remnant endangered grassland regional ecosystems Regional ecosystems;
- remnant of concern regional ecosystems;
- remnant of concern grassland regional ecosystems;
- watercourse regional ecosystem;
- protected animals Endangered, vulnerable, near threatened and special least concern animals under the Nature Conservation Act 1992; and
- protected plants Extinct in the wild, endangered, vulnerable or near threatened protected plants under the *Nature Conservation Act 1992*.

The state significant biodiversity values are listed on **Table 1**.

The state significant biodiversity values affected by the revised Project are a combination of endangered and of concern regional ecosystems, as watercourse regional ecosystem and animals and plants listed in the Nature Conservation Act 1992.

An area of 2.39 ha of the poplar box woodland (11.3.2) falls within 50 metres of Lagoon Creek, which is a stream order 2, making the area of the community that is adjacent to Lagoon Creek a state significant biodiversity value.

Table 1 Impact to SSBVs

RE	VMA Class	BVG 1: 1M	Short Description (Regulation)	Total area (ha)	% riparian "Regional" corridor	% "State" terrestrial corridor	Area in Stream Order Buffer
11.3.1	E	25a	Open-forest dominated by <i>Acacia harpophylla</i> and/or <i>Casuarina cristata</i> (particularly in southern parts), with or without scattered emergent <i>Eucalyptus</i> spp.	12.0	0	0	0
11.3.2	OC	17a	<i>Eucalyptus populnea</i> woodland to open-woodland. <i>E. melanophloia</i> may be present and locally dominant. There is sometimes a distinct low tree layer	4.5	0	0	2.39 (SO2)
11.3.17	OC	25a	<i>Eucalyptus populnea</i> woodland with <i>Acacia harpophylla</i> and/or <i>Casuarina cristata</i> on alluvial plains	5.8	0	0	0
11.3.21	E	30a	Grassland dominated by <i>Dichanthium sericeum</i> and/or	35.9	0	0	0

RE	VMA Class	BVG 1: 1M	Short Description (Regulation)	Total area (ha)	% riparian "Regional" corridor	% "State" terrestrial corridor	Area in Stream Order Buffer
			<i>Astrelba</i> spp. (<i>A. lappacea</i> , <i>A. elymoides</i> and <i>A. squarrosa</i>). A wide range of other grass and forb species is usually present and may dominate depending on seasonal conditions and management regime.				
11.8.11	OC	30b	<i>Dichanthium sericeum</i> grassland on Cainozoic igneous rocks	4.1	0	0	0
11.9.5	E	25a	<i>Acacia harpophylla</i> and/or <i>Casuarina cristata</i> open forest on fine-grained sedimentary rocks	12.6	0	0	0
11.9.10	OC	25a	<i>Eucalyptus populnea</i> predominates forming a distinct but discontinuous canopy (15-18 m tall). <i>Acacia harpophylla</i> and sometimes <i>Casuarina cristata</i> usually forms a lower tree layer (8-14 m tall) which occasionally becomes the dominant layer.	4.1	0	0	0
11.9.13	OC	13d	<i>Eucalyptus moluccana</i> or <i>E. microcarpa</i> open forest on fine grained sedimentary rocks	3.6	0	0	0

Listed species	NC Status	Description
<i>Phascolarctos cinereus</i> - Koala	Special least concern	Poplar box woodland, that is habitat for the Koala will be cleared for the revised Project in the Manning Vale West pit and in areas adjacent to Lagoon Creek.
<i>Digitaria porrecta</i> - Finger panic grass	Near threatened	One isolated patch in western part of the revised Project area, in the Manning Vale West Pit.
<i>Homopholis belsonii</i> - Belson's panic	Endangered	Twelve patches found in the bluegrass dominated grassland community and are found in the Manning Vale West Pit and the Willaroo Pit, to the south of Lagoon Creek. This species has been found in the shelter of trees in the brigalow and poplar box vegetation communities.

E – Endangered; OC – Of Concern

5. Impacts on Federal threatened species and communities

The revised Project will result in the clearing of 64.7 ha of three threatened ecological communities, as listed in **Table 2**.

Three flora species that are listed under either the EPBC Act have been recorded from the revised Project site and are within the disturbance footprint. The affected species are listed **Table 2**.

The EPBC Offset calculator the each of the matters of National Environmental Significance are included in **Appendix A**.

Table 2 Impact on MNES

Matters of National Environmental Significance Impacts			
MNES	EPBC Act Status	Significantly Impacted	Primary reason for the outcome
Bluegrass dominant grasslands of the Brigalow Belt Bioregions (North and South)	Endangered	Yes – 40.1 ha	Significant impact as per the MNES Guidelines Version 1.1
Brigalow (<i>Acacia harpophylla</i> dominant and co-dominant)	Endangered	Yes – 24.6 ha	Significant impact as per the MNES Guidelines Version 1.1 Brigalow
Listed Flora Species			
<i>Bothriochloa biloba</i> (lobed blue grass)	Vulnerable	Yes	Significant impact as per the MNES Guidelines Version 1.1
<i>Digitaria porrecta</i> (finger panic grass)	Endangered	Yes	Significant impact as per the MNES Guidelines Version 1.1
<i>Homopholis belsonii</i> (Belson's panic)	Vulnerable	Yes	Significant impact as per the MNES Guidelines Version 1.1

6. Proposed offsets for residual impacts on State significant biodiversity values

The proposed offset for state significance biodiversity values is described below and presented in **Table 3**.

Brigalow Offset

The total Brigalow impact of the revised Project on brigalow is 28.7 ha, which includes both Queensland and Commonwealth listed communities, comprised of RE 11.3.1, RE 11.9.5 and 11.9.10.

NAC is currently investigating several options with regard to suitable Brigalow offset areas within the Bioregion. The Brigalow offset for Queensland and Commonwealth impacts will be collocated to improve the ecological benefit of the offset and to improve the management effectiveness of the offset.

Natural grasslands Offset

The bluegrass community consists of RE 11.3.21 and 11.8.11. Of this, the entire 40.1 ha is listed by Queensland and Commonwealth legislation that require to be offset. The proposed bluegrass offset of 247 ha has been identified on the NHG's property and this should satisfy the Queensland and Commonwealth offset policies. The three listed grass species that may be impacted by the revised Project have been identified as occurring within the proposed offset area, and so will be collocated within the natural grasslands offset area.

Poplar box and Gum-topped box Offset

NAC is investigating options for the establishment of an offset for poplar box (11.3.2 and 11.3.17) and gum-topped box (11.9.13) in the Bioregion. Initial information has identified that an appropriate area is available to offset the clearing of 13.9 ha of these communities. Investigations are continuing and discussions are planned with third party landholders on whose property the offset may be located.

Fauna listed under Nature Conservation Act

Habitat for the Koala, a special least concern species under the Nature Conservation Act, will be cleared for the revised Project. This habitat is poplar box woodland and an area of 10.3 ha is to be cleared, in the Manning Vale West pit and along Lagoon Creek.

An offset for the Koala will be satisfied with the creation of an offset for the poplar box woodland (11.3.2) – an of concern regional ecosystem.

Plants listed under Nature Conservation Act

Two species of plant listed under the Nature Conservation Act will be affected by the revised Project. These species are *Digitaria porrecta* and *Homopholis belsonii*.

These species will be translocated and re-established within areas of bluegrass dominant grassland offset, to be located to the south of the revised Project on land owned by NAC.

Table 3 Proposed State Offsets

RE Impacted	Impacted Area (Ha)	Stream Order (QBOP)	Proposed offset area
11.3.1	12	NA	60 ha within an area of naturally regenerating Brigalow that is part of the Brigalow TEC is being investigated to satisfy both the EPBC EOP requirement and the QBOP requirement
11.3.2	4.5	2	An appropriate offset area will be identified and secured to meet QBOP requirements that is on a stream order of 2, around 20 ha in area.
11.3.17	5.8	NA	To be collocated with offsets for 11.9.5, 11.9.10 and 11.9.13, around 30 ha in area.
11.3.21	35.9	NA	247 ha of Bluegrass dominated grasslands with secured to offset impact to 11.3.21, on land adjacent to the revised Project.
11.8.11	4.1	NA	247 ha of Bluegrass dominated grasslands with secured to offset impact to 11.3.21, on land adjacent to the revised Project around 20 ha in area.
11.9.5	12.6	NA	To be collocated with offsets for 11.3.17, 11.9.10 and 11.9.13 around 60 ha in area.
11.9.10	4.1	NA	To be collocated with offsets for 11.3.17, 11.9.5, and 11.9.13 around 20 ha in area.
11.9.13	3.6	NA	To be collocated with offsets for 11.3.17, 11.9.5 and 11.9.10

6.1. Bluegrass dominated Grasslands

The bluegrass dominated natural grasslands consists of RE 11.3.21 and 11.8.11. Of this, the entire 40.1 ha is captured by the EPBC offset requirements. The proposed bluegrass offset of 90 ha has been identified on the NAC's property and this should satisfy both Commonwealth and State offset policies. The three listed grass species that may be impacted by the revised Project have been identified as occurring within the proposed offset area, and so will be collocated within the natural grasslands offset area.

6.2. Brigalow, Poplar Box and Gum-topped Box RE, s

The proposed offsets for impacts to REs 11.3.1, 11.3.2, 11.3.17, 11.9.5, 11.9.10 and 11.9.13 will be collocated within the proposed offset area/s that has been proposed for the impacted Brigalow TEC, as described in section 7.1 of this strategy. The area of Brigalow, Poplar Box and Gum-topped Box RE needing to be offset is 42.6 ha. The offset area/s will be approximately 250 ha and will satisfy the QBOP. The offset area/s for these communities will most likely be located away from the revised Project site and is yet to be secured.

The combined Brigalow offset will consist of an RE (250Ha) that is listed as a Brigalow TEC under the EPBC Act and will therefore satisfy both Commonwealth and State offset policies and will contribute to a greater environmental outcome due to the larger patch size. NHG is currently investigating several options with regard to suitable Brigalow offset areas within the Bioregion.

7. Proposed offsets for residual impacts on Federal threatened species and communities

The offset areas have been calculated using the EPBC Offset calculator and the assessment of the condition of TECs within the revised Project site. **Table 4** lists the areas to be provided as an offset.

For the Brigalow offset, the area of impact has been calculated as 24.6, being the area of the constituent regional ecosystems – 11.3.1 and 11.9.5. With this area and an assessment of the condition of the community and an conservative estimate for the time of a patch of brigalow to reach ecological benefit and area of 60 ha is produced from the calculator. This area has been used as the size of the brigalow offset to be secured. Once a patch of brigalow has been identified and assessed, this area will need to be revised, with a site assessment of the condition of the offset site.

The bluegrass dominant grassland will be offset on land owned by NAC. The area of land that is suitable for use as a grassland and listed species offset is 247 ha. This area has been determined by condition assessment completed 2013. The area of impact and the assessment of the condition of the impacted communities have been used in the EPBC Offset calculator to determine the expected area of offset needed to offset the impact to the bluegrass dominant grassland.

Table 4 Proposed Federal Offsets

Threatened Species or Community Impacted	Area (Ha)	Proposed Offset area
Brigalow (Acacia harpophylla dominant and co-dominant)	24.6	60 ha within an area of naturally regenerating Brigalow that is part of the Brigalow TEC is being investigated to satisfy both the EPBC EOP requirement and the QBOP requirement
Bluegrass dominant grasslands of the Brigalow Belt Bioregions (North and South)	40.1	90 ha of Bluegrass dominated grasslands will be required to offset the impact to this community. An area of 247 ha is available for this offset.
<i>Bothriochloa biloba</i> (lobed blue grass)	70	70 ha of grasslands will be required to offset the impact to this species. An area of 247 ha is available for this offset.
<i>Digitaria porrecta</i> (finger panic grass)	165	165 ha of grasslands will be required to offset the impact to this species. An area of 247 ha is available for this offset.
<i>Homopholis belsonii</i> (Belson's panic)	87	87 ha of grasslands will be required to offset the impact to this species. An area of 247 ha is available for this offset.

7.1. Brigalow TEC Offset

The total Brigalow impact for the revised Project is 24.6 ha has been classified as the EPBC listed TEC (comprised of RE 11.3.1 and RE 11.9.5).

NAC is currently investigating several options with regard to suitable Brigalow offset areas within the Bioregion. The Brigalow TEC offset will be collocated with the State offset and will contribute to a greater environmental outcome due to the larger patch size.

An offset of approximately 60 ha is expected to be needed to offset the impact of the revised Project on the Brigalow TEC.

7.2. Natural grasslands Offset

The bluegrass dominated natural grasslands consists of RE 11.3.21 and 11.8.11. Of this, the entire 40.1 ha is captured by the EPBC offset requirements. The proposed bluegrass offset of 90 ha has been identified on the NAC's property and this should satisfy both Commonwealth and State offset policies. The three listed grass species that may be impacted by the revised Project have been identified as occurring within the proposed offset area, and so will be collocated within the natural grasslands offset area.

8. Delivery of Biodiversity Offsets

The next phase of the process after the revised Project has been approved and issued with an amended EA will be to finalise arrangements for the potential offset areas.

Prior to construction, a Biodiversity Offset Package will be prepared that will:

- identify and secure an offset package/s – following completion of ecological assessments of proposed offset sites;
- secure a legally binding mechanism on Title; and
- develop an Offset Area Management Plan (**OAMP**) for each offset management area.

There are several legally binding mechanisms available that may be applied to the final Biodiversity Offset Package including:

- ‘gazetted as a protected area (e.g. a nature refuge)’ under the NCA;
- ‘voluntary declaration of an area of high nature conservation value’ under the VMA;
or
- use of a ‘covenant’ under the *Land Title Act 1994* or *Land Act 1994*.

9. Management of Offset Areas

An OAMP will be prepared for each offset site to meet the requirements of the EPBC EOP and QBOP. The OAMPs will include information on the threats and the management actions required at each offset site to abate those threats. Each OAMP will contain an estimate of the costs of management and will provide a monitoring program that will extend until the management outcomes are achieved.

Management actions may include:

- management of grazing;
- weed management;
- feral pest management;
- management of fire; and
- if applicable, active revegetation.

The length of active management will be influenced by the condition of vegetation, type of habitat, climatic conditions and vegetation on site, as well as existing management issues. The OAMPs will incorporate conditions of approval required by the State and Commonwealth departments, including regular monitoring and reporting such as those conditions granted for the Stage Two Project in 2006.

Appendix A – EPBC Offset Calculator

Offsets Assessment Guide

For more information, visit www.ec.gc.ca/offsets or call 1-877-975-2739

2, October 2012

This guide is subject to change without notice.

Name of Offsets Provider		Region
Name of Offsets Buyer		Region
Project Activities		Information
Accountability of Offsets		1.2%
Baseline Emissions		1.2%

Impact calculator			
Projected matter attributes	Description	Quantum of impact	Information source
Area of community	Building houses	Area 24.0 hectares	Vegetation and wildlife survey report (revised) PROPLES, 2013
	Logan Creek Road flows through the mining area	Quality 4 Subtle but Participations of impact of 0.41 hectares	
Area of habitat		Area	
		Quality	
		Participation of impact of 0.00	
Projected matter attributes	Description	Quantum of impact	Information source
Number of hectares	Change in habitat conditions, being a change in extent		
Monthly rate	Change in number of road kills per year		
Number of habitat banks	Change in number of habitat banks		

Key to Cell Colours	
Light blue	Use as projected
Dark blue	Drop-down list
Light green	Calculated output
Light purple	Non-negotiable attribute

Offset calculator															
Projected matter attributes	Total relevant quantum of impact	Units	Proposed offset	Time horizon (years)	Start area and quality	Future area and quality without offset	Future area and quality with offset	Raw gains	Confidence in result (%)	Adjusted gain	Net present value (adjusted hectares)	% of (90%) direct offset requirement met	Minimum offset requirement	Cost (\$ total)	Information source
Area of community	9.41	Adjusted hectares	Offset by year identified, including offset provided by No. 100 Group	Time horizon (years)	Start area (hectares)	Risk of loss (%) without offset (max 25 years)	Future area (hectares) without offset (max 25 years)	Future area (hectares) with offset (max 25 years)	1.00	90%	6.00	9.05	Yes		
Area of habitat	No	No	No	Time horizon (years)	Start area (hectares)	Risk of loss (%) without offset (max 25 years)	Future area (hectares) without offset (max 25 years)	Future area (hectares) with offset (max 25 years)	0.00	0.00	0.00	0.00	No		
Number of hectares	No	No	No	Time horizon (years)	Start area (hectares)	Risk of loss (%) without offset (max 25 years)	Future area (hectares) without offset (max 25 years)	Future area (hectares) with offset (max 25 years)	0.00	0.00	0.00	0.00	No		
Monthly rate	No	No	No	Time horizon (years)	Start area (hectares)	Risk of loss (%) without offset (max 25 years)	Future area (hectares) without offset (max 25 years)	Future area (hectares) with offset (max 25 years)	0.00	0.00	0.00	0.00	No		
Number of habitat banks	No	No	No	Time horizon (years)	Start area (hectares)	Risk of loss (%) without offset (max 25 years)	Future area (hectares) without offset (max 25 years)	Future area (hectares) with offset (max 25 years)	0.00	0.00	0.00	0.00	No		

Summary			
Projected matter attributes	Quantum of impact	Net present value of offset	% of impact offset
Number of hectares	0	0.00	0.00%
Monthly rate	0	0.00	0.00%
Number of habitat banks	0	0.00	0.00%
Number of hectares	0	0.00	0.00%
Number of habitat banks	0	0.00	0.00%
Area of community	9.41	9.05	91.95%
Area of habitat	No	0.00	0.00%
Area of community	9.41	9.05	91.95%
Area of habitat	No	0.00	0.00%
Direct offset adequate?		Yes	
Cost (\$)		0.00	0.00
Other compensatory measures (\$)		0.00	0.00
Total (\$)		0.00	0.00

