

Grassy Plains Network and VNPA response to:
Preliminary Documentation:
Industrial Facility, 276 Rex Road, Campbellfield, VIC
EPBC 2021/8934



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Contact:
Adrian Marshall
Facilitator, Grassy Plains Network Victorian
National Parks Association
adrian@vnpa.org.au
0413 757 173

1.1. Who we are

The Victorian National Parks Association (VNPA) is one of Victoria's leading nature conservation organisations. It is an independent, non-profit, membership-based group, which for 70 years has existed to protect Victoria's unique natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

The Grassy Plains Network represents land management professionals, academics, ecologists and community members concerned about the ongoing decline of grassy ecosystems across Melbourne and its surrounds. We advocate for improved grassland protection and management. We are part of the VNPA.

1.2. Key points

- Site of environmental crime.
 - 276 Rex Road was illegally cleared of Grassy Eucalypt Woodland of the Victorian Volcanic Plain. No offsetting has occurred no recompense for this destruction. The fine paid by the guilty party did not go to environmental works.
 - The proposed development, in its disregard for the environmental values present, and those present until just a few years ago, only exacerbates that insult to nature.
 - DEECCW did not take their own compliance action, despite the clearing being a clear breach of the Act.
- No avoid or minimise.
 - The proponent had made no attempt to retain or mitigate impacts of Matters of National Environmental Significance.
 - The proponent claims that “the only alternative to the proposed action would be to leave the site in its current form”. This is false. No evidence is put forward to support this lack of avoidance or even mitigation.
 - In their discussion ‘Alternative to the Proposed Action’ the proponent seeks to imply that designations of the area as being ‘urban’, for ‘employment, and ‘zoned for industrial purposes’ are relevant when they are not. This is a deliberate attempt to mislead.
 - By proceeding directly to offsetting, the proponent is disregarding their clear responsibilities under the EPBC Act.
- Assessment as Derived Grassland incorrect.
 - The site has had its mature *Eucalyptus cameldulensis* cleared. However, if left, regrowth would occur naturally from the seed bank. To immediately label the site as a derived grassland ignores the very natural ecological processes taking place on the site. If it were decades after clearing and the site was treeless then the case might be made that this is now derived grassland, but that is not the case here.
 - The proponent is putting forward a poor argument for the sake of minimising their responsibilities under the EPBC ACT.

- What should happen.
 - Matted Flax-lily should be retained
 - The site should be managed to restore understory and encourage recruitment to River Red Gums to return the site to its former quality
 - Management should ensure GSM habitat is improved.
- Land use history fails to mention environmental crimes
 - The native vegetation clearing that occurred at 276 rex Road was illegal. The proponent is being disingenuous and trying to conceal the site's history.
- No adequate survey for Victorian Grassland Earless Dragon
 - It is well recognised that DAWE's *Survey Guidelines for Australia's Threatened Reptiles* 2011 guidelines are inadequate for identifying the presence of Victorian Grassland Earless Dragon. New guidelines exist and should be followed. House tiles are not sufficient.
- Poor survey method for Striped Legless Lizard.
 - One tile grid is insufficient. The reason for its location at the back of the site is not given and should be considered suspect.
 - No data on time of day the surveys were conducted and no temperate data is provided. "Morning" is insufficient. If the surveys were conducted before mid-morning, the temperature in Cragieburn, Melbourne, would likely be below 15 degrees for the majority of the survey dates.
- Assessment of impacts ignores impacts of environmental crime.
 - Statements such as the following ignore the fact that the deliberate clearing with heavy machinery has occurred. 'Matted Flax-lily habitat was variable throughout the site and was overall of moderate quality. The canopy component of the Plains Grassy Woodland EVC was absent within the mapped habitat zone, and understory structure and species richness were sub-optimal. A number of lifeforms were present; however, cover and species richness were below the prescribed benchmark for the EVC. The habitat zone comprised a total area of 1.03 ha of native vegetation.'
- Golden Sun Moth were recoded as present in 2020/21. The proponent's failure to identify them in 2025/26 does not mean they are not present. No details are given of the survey methodology. Small populations of Golden Sun Moth do not emerge every year. It is erroneous to assume their absence.
- Environmentally Sustainable Development.
 - The assertion that this project is an example of environmentally sustainable development makes a mockery of the legislation.

- Suitability of offset.
 - We question the suitability of the proposed offset site.
 - It is not in the same catchment.
 - It is distant to the original site.
 - The Matted Flax-lily come from Grassy Eucalypt Woodland and should be translocated to Grassy Eucalypt Woodland
 - We also question the habitat hectare calculations, in particular the low Landscape Context Score.