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4 December 2024

Eurimbula ProjectCo Pty Ltd

Acting Director

Queensland North Assessments

Department of Climate Change, Energy, the Environment and Water

GPO Box 3090, Canberra ACT 2601

Attention: [REDACTED]

Re: Eurimbula Solar Farm – Request to vary proposal to take an action [EPBC2024/09802] and change of person proposing to take an action

Variation to the proposed action

I am writing to formally request a variation to the proposed action EPBC2024/09802, referred by Eurimbula ProjectCo Pty Ltd (Eurimbula ProjectCo) to the Commonwealth Environment Department on 22 February 2024. This request is made in accordance with section 156A of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and relevant parts of the Regulations.

The originally referred action includes the construction, operation and decommissioning of a solar farm within the disturbance footprint (1,280.9 ha), occurring within the larger project area (2,809.3 ha) of six adjacent lots located in the Gladstone Regional Council Local Government Area (approximately 50 km southeast of Gladstone and immediately adjacent and to the west of Eurimbula National Park). The referred action included (but was not limited to) civil works, on-site quarries and installation of temporary and permanent facilities and infrastructure (e.g. photovoltaic system solar arrays, substation and Battery Energy Storage System (BESS)).

Eurimbula ProjectCo referred the Eurimbula Solar Farm under the EPBC Act due to the potential for significant impact to Matters of National Environmental Significance (MNES). On 28 May 2024, the department determined the proposed action to be a controlled action, with the following controlling provisions:

- The World Heritage values of a World Heritage property (sections 12 & 15A)
- The National Heritage values of a National heritage place (sections 15B & 15C)
- Listed threatened species and communities (sections 18 and 18A)
- The environment in the Great Barrier Reef Marine Park (sections 24B & 24C).



Further assessment is required via preparation of Public Environment Report (PER).

Since the referral's submission to the Commonwealth in February 2024, Eurimbula ProjectCo revised the design and layout of the solar farm and associated components. This has resulted in an increased project area (2,824.7 ha), now incorporating the entirety of lot 4 on RP912980. Further, an iterative design optimisation process which incorporated avoidance by design led to altered siting of infrastructure, and a condensed disturbance footprint. The revised layout of the action has eliminated the need for any works to be carried out east of Sandy Creek (thereby posing an opportunity for incorporation of this land and associated habitat into the proposed offset area), and reduced the number of watercourse crossings, the required width of access tracks (down to 5 m) and the overall disturbance footprint (down from 1,281 ha to 1,173 ha). The optimisation resulted in a reduction of the solar resource that would have otherwise been able to be captured.

The varied footprint reduces impacts to MNES through a reduction in the extent of habitat removed for threatened species and ecological communities, and by inhibiting any construction activities from occurring within the Sandy Creek riparian corridor (buffered by a minimum of an 80 m no-go zone from each side from the creek's centreline). Within the project area, Sandy Creek presents the greatest opportunity (although still largely restricted) for connectivity to the Great Barrier Reef. We note that the project area has no hydrological connectivity to Baffles Creek to the south. In all instances, the area of habitat to be disturbed per threatened species or ecological community will be less with the implementation of the varied footprint compared with the referral footprint (see Table 1 below).

Table 1: Impacts to threatened species habitat and TECs presented in the referred and varied proposed action documentation

Threatened species or ecological community	Impact – referral footprint (ha) ¹	Impact – varied footprint (ha)
Subtropical eucalypt floodplain TEC	6	5
<i>Cycas megacarpa</i>	19	17
Greater glider (southern and central)	111	94
Yellow-bellied glider (south-eastern)	97	90
Koala*	234	199
Grey-headed flying-fox*	239	204
Squatter pigeon (southern)	238**	204**

*Species not historically known to the project area nor identified during contemporary surveys.

**Not including dispersal habitat (i.e. non-remnant areas).

There are no new MNES that require consideration, as the varied footprint intersects similar habitat to the referred footprint. Figure 1 below presents a visual representation of the referred project area and disturbance footprint (i.e. 'Development Area'). Figure 2 shows the varied project area and footprint.

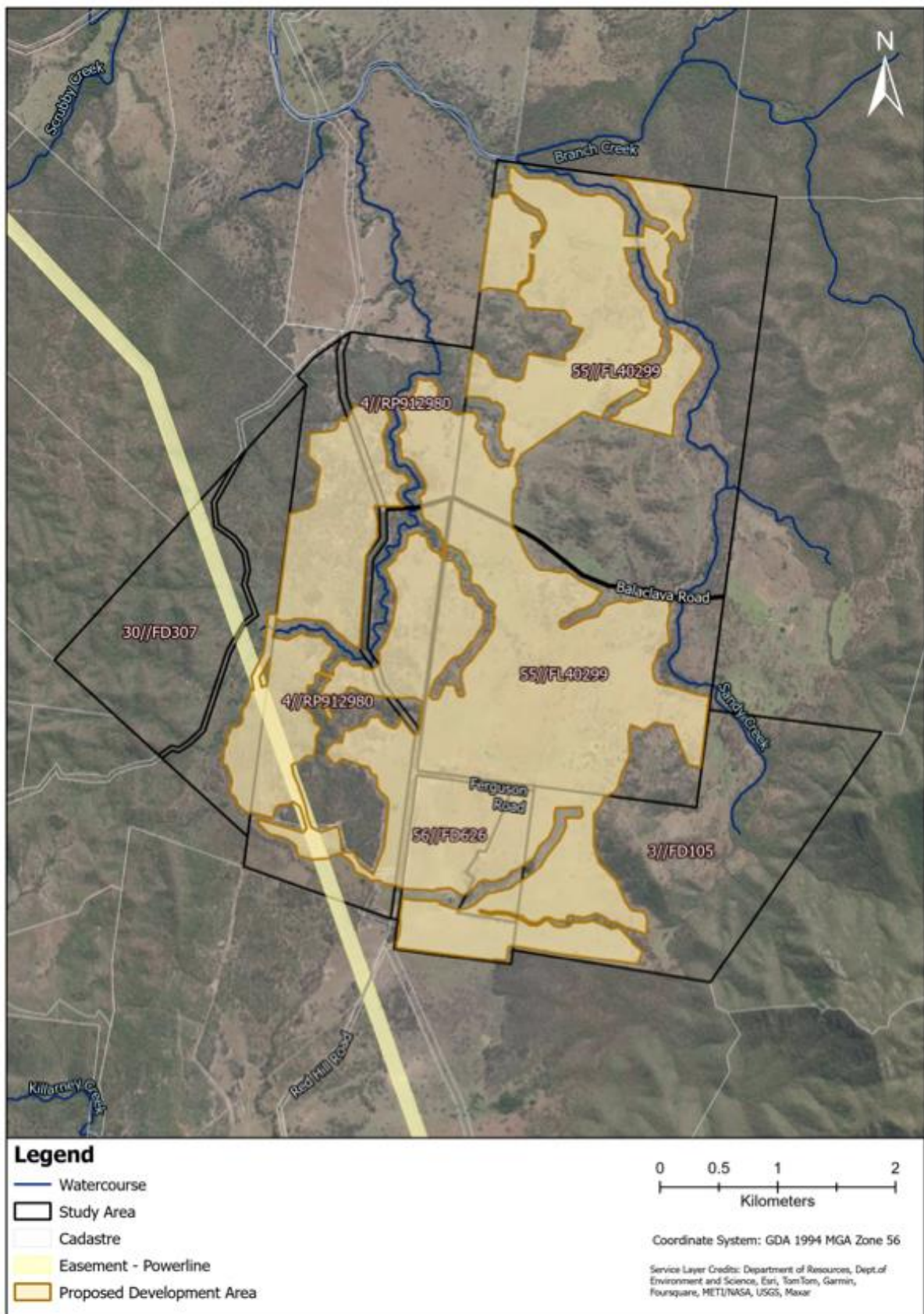


Figure 1: Referred project area and disturbance footprint (i.e. Development Area)

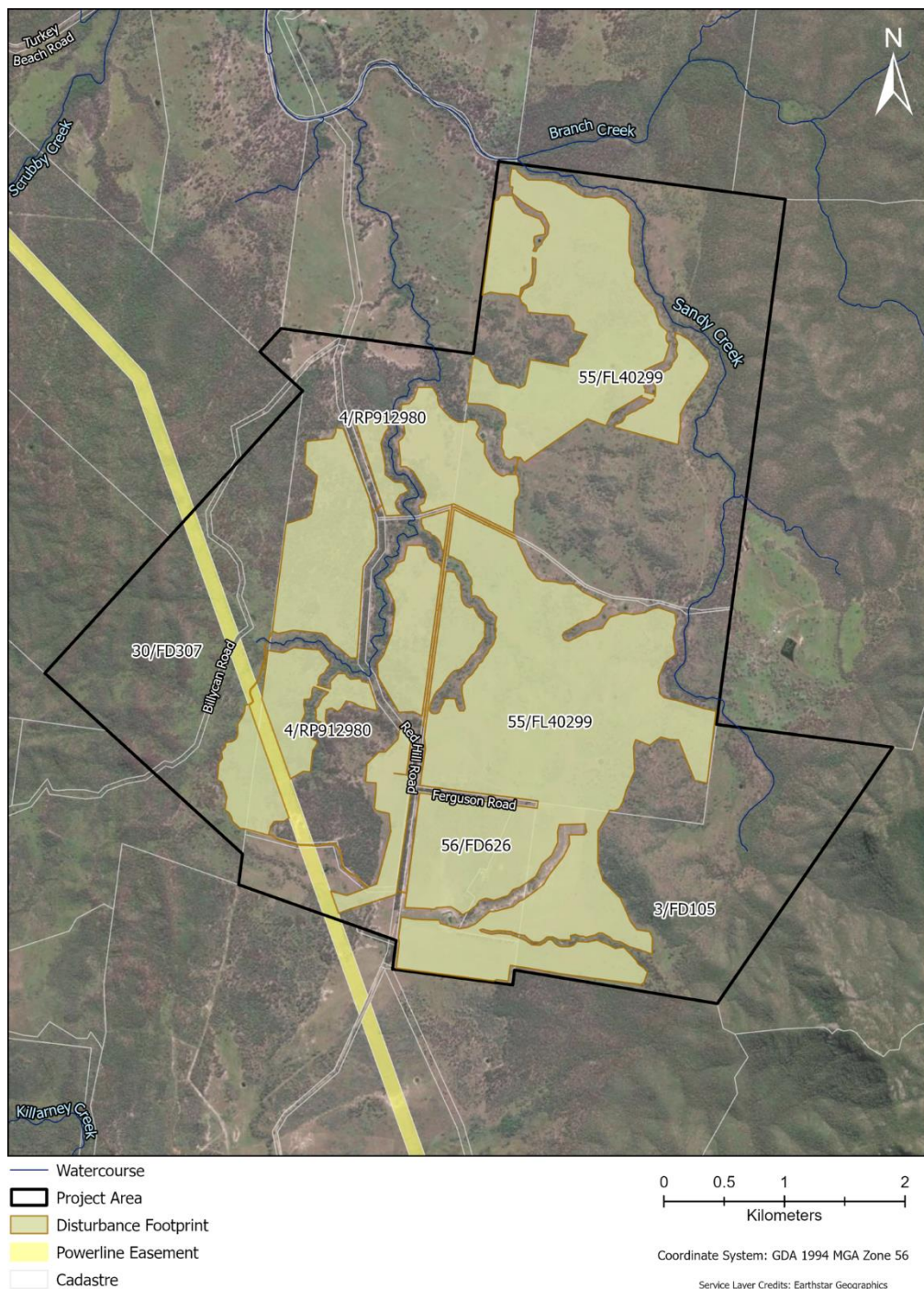


Figure 2: Varied project area and disturbance footprint

The varied proposed action will continue to facilitate the clearing for and construction, operation and decommissioning of the Eurimbula solar farm. Specific activities and infrastructure now comprise:

- High voltage Transmission lines to “cut-in” to facilitate grid connection via existing on-site 275 kV transmission lines
- New High Voltage substation as interface in the existing transmission lines (to be owned by Powerlink)

- New High to Mid Voltage substation and transformer to convert power to 33 kV
- Up to 696 MW Solar Array
- 666 MW / 1,332 MW 2-hour BESS
- On-site Control Building, and operation and maintenance, and warehousing facilities
- Construction and upgrade of access roads (within the disturbance footprint)
- Construction of up to 18 culverts at 5 separate locations within the disturbance footprint to be aligned with site-specific erosion and sediment controls
- On-site ground works within the disturbance footprint to facilitate construction
- Fencing.

Importantly, no quarries are now proposed to be developed within the project area to facilitate the action's construction. Planned activities associated with the varied action include:

- Clearing vegetation
- Earthworks and associated site preparation. Spoil from this will be used as source materials for other site works including substation foundations and internal roads
- Waterway crossing and barrier works
- Construction and operation of temporary facilities
- Construction and operation of permanent infrastructure
- Rehabilitation of temporarily disturbed areas (i.e. those areas required for construction but not operation of the Project).

Changing the person proposing to take an action

In addition to varying the proposed action, this variation request is also concerned with changing the person proposing to take an action, in accordance with section 156F of the EPBC Act. The contact person for the proposed action as nominated in the referral was [REDACTED] (email: [REDACTED]). While the proponent will remain as Eurimbula ProjectCo, the designated contact person is now to be:

[REDACTED]

Australian Country Manager, Elements Green

Ph [REDACTED]

Email [REDACTED]

Furthermore, [REDACTED] (email: [REDACTED]), the nominated referring party (on behalf of 2rog Consulting Pty Ltd), had been designated to receive correspondence from the Commonwealth regarding the referral and progression of assessment of the project. This also requires updating to:

[REDACTED]

Associate Consultant, 2rog Consulting Pty Ltd

Ph [REDACTED]

Email [REDACTED]

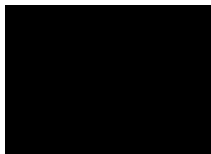
Concluding statements

Overall, we consider that the varied action is substantially the same as the originally referred action and can be assessed via the current process (EPBC2024/09802). The PER has been prepared per the Final PER Guidelines issued by the Commonwealth. The varied disturbance footprint does not affect our ability to provide the required information. Information about the referred versus the varied layouts is discussed in the PER in relation to feasible alternatives.

I trust the above information provides you with the details required to consider this formal request to vary the proposed action and change the person proposing to take an action under s156A and s156F of the EPBC Act respectively. Please send an invoice for the cost recovery fee of varying the action and we will pay immediately.

Please contact [REDACTED] (see above) if you require additional details.

Sincerely yours,

A large black rectangular redaction box covering the signature of the Company Director.

Company Director - Eurimbula ProjectCo Pty Ltd

A small black rectangular redaction box covering the contact information of the Company Director.