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19 December 2025

Branch Head
Environmental Regulation
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090, Canberra Act 2601

Attention: [REDACTED]

RE : Eurimbula ProjectCo Pty Ltd - Variation Request outlining the implications of change in the Eurimbula Solar Farm disturbance footprint

Introduction

I am writing to formally request a variation to the proposed action EPBC2024/09802, referred by Eurimbula ProjectCo Pty Ltd (EPCo) to the Commonwealth Environment Department (the 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 proposed action at present (i.e. as varied in January 2025), includes the construction, operation and decommissioning of a solar farm within the original disturbance footprint (1,173 ha), occurring within the larger project area (2,824.7 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).

Context

EPCo referred the Eurimbula Solar Farm (ESF) under the EPBC Act due to the potential for significant impacts to Matters of National Environmental Significance (MNES). On 28 May 2024, the Department determined the proposed action to be a controlled action, with assessment required via preparation of Public Environment Report (PER) with regard to the following relevant controlling provisions:

- World Heritage properties (sections 12 & 15A)
- National Heritage places (sections 15B and 15C)
- Listed threatened species and communities (sections 18 and 18A)
- Great Barrier Reef Marine Park (sections 24B and 24C).



- A variation request for the proposed action was later submitted to the Department on 4 December 2024, and accepted 15 January 2025.

Rationale

EPCo has continued with multiple areas of development planning which has provided the impetus to reduce the size of the ESF footprint, that is the basis for this request:

- The next step in the EPBC approval process after adequacy review will be public consultation. EPCo has responded to various forms of community feedback in reducing the project's impacts on MNES to ensure the ESF is well received by the public. EPCo has listened to the concerns voiced in the community and reduced the project footprint to minimise impacts on MNES as far as possible;
- The capital expenditure required to complete the project under the revised layout will be reduced thereby supporting the project securing appropriate finance to achieve completion;
- Commercial discussions with industry counterparts have highlighted a reducing appetite for contracting for solar-based energy. EPCo still consider the solar to be an essential part of the project, however the reduction in size / solar arrays, reduces potential negative views held with regard to the large size of the project;
- Other approval processes will be far more accepting of the newly revised layout of the proposed action (i.e. small disturbance footprint).

Variation to the proposed action

The newly revised layout of the proposed action, which is the focus of this variation request, has substantially reduced the original disturbance footprint by removing large areas in the north and west of the project area from the development area. The proposed varied disturbance footprint totals 545.4 ha, down from 1,173 ha (see Figure 1 and Figure 2 respectively, for a comparison of the proposed varied footprint and the original footprint per the variation to EPBC 2024/09802 from December 2024).

The newly revised layout footprint (as proposed to be varied in this letter; Figure 1) reduces impacts to MNES throughout the project area via a reduction in the extent of habitat removed for threatened species and ecological communities, as seen in

Table 1 below. The majority of habitat for MNES with in the project area will now be retained via the revised layout.

There are no new MNES that require consideration as a result of the newly revised (varied) disturbance footprint.

Table 1: Impacts to threatened species' habitat and TECs, per the original and newly revised (varied) footprints

MNES	Habitat type / condition class	Impacts to habitat – original footprint (ha)	Impacts to habitat – proposed varied footprint (ha)
Koala*	Breeding & foraging	199.2	0.8
	Dispersal		6.7 (of which 5.4 ha is non-remnant)
Grey-headed flying-fox*	Potential refuge	1.6	0
	Foraging	201.7	7.5 (of which 5.4 ha is non-remnant)
Squatter pigeon (southern)**	Breeding	203.3	0
	Foraging		7.5 (of which 5.4 ha is non-remnant)
Greater glider (southern & central)	Current & future breeding & foraging habitat***	119.6	0.02
	Dispersal		0
Yellow-bellied glider (south-eastern)	Breeding	3	0
	Foraging	86.3	0
	Dispersal		0
<i>Cycas megacarpa</i>	Suitable	16.8 (incl. removal of 14 individuals)	0
Subtropical eucalypt floodplain TEC	C1	0	0
	C2	4.6	0

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

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

***Per consensus reached with the Department (10 July 2025) as part of the PER's adequacy review process regarding greater glider habitat mapping for the project

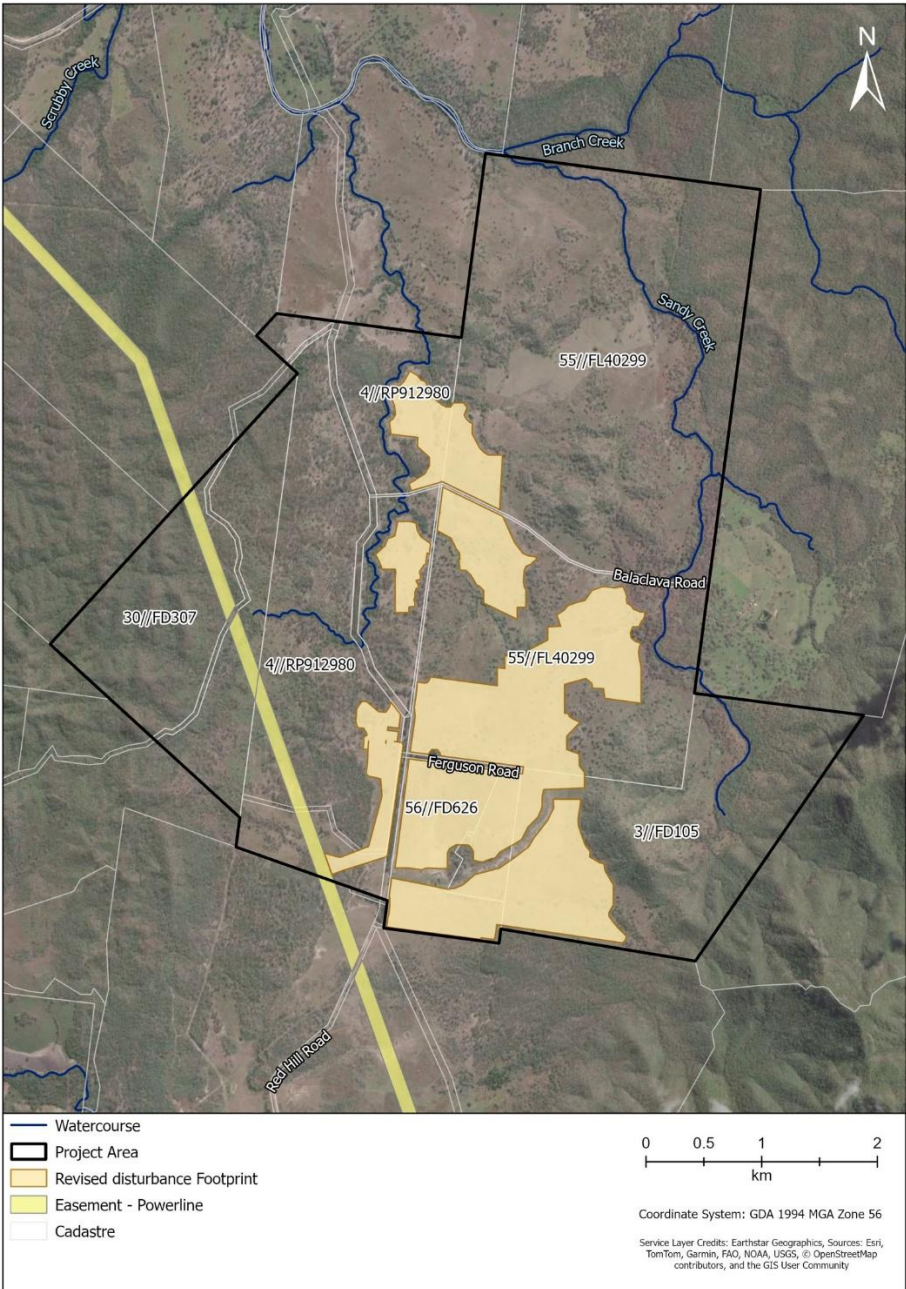


Figure 1: Revised disturbance footprint within the project area (i.e. proposed variation)

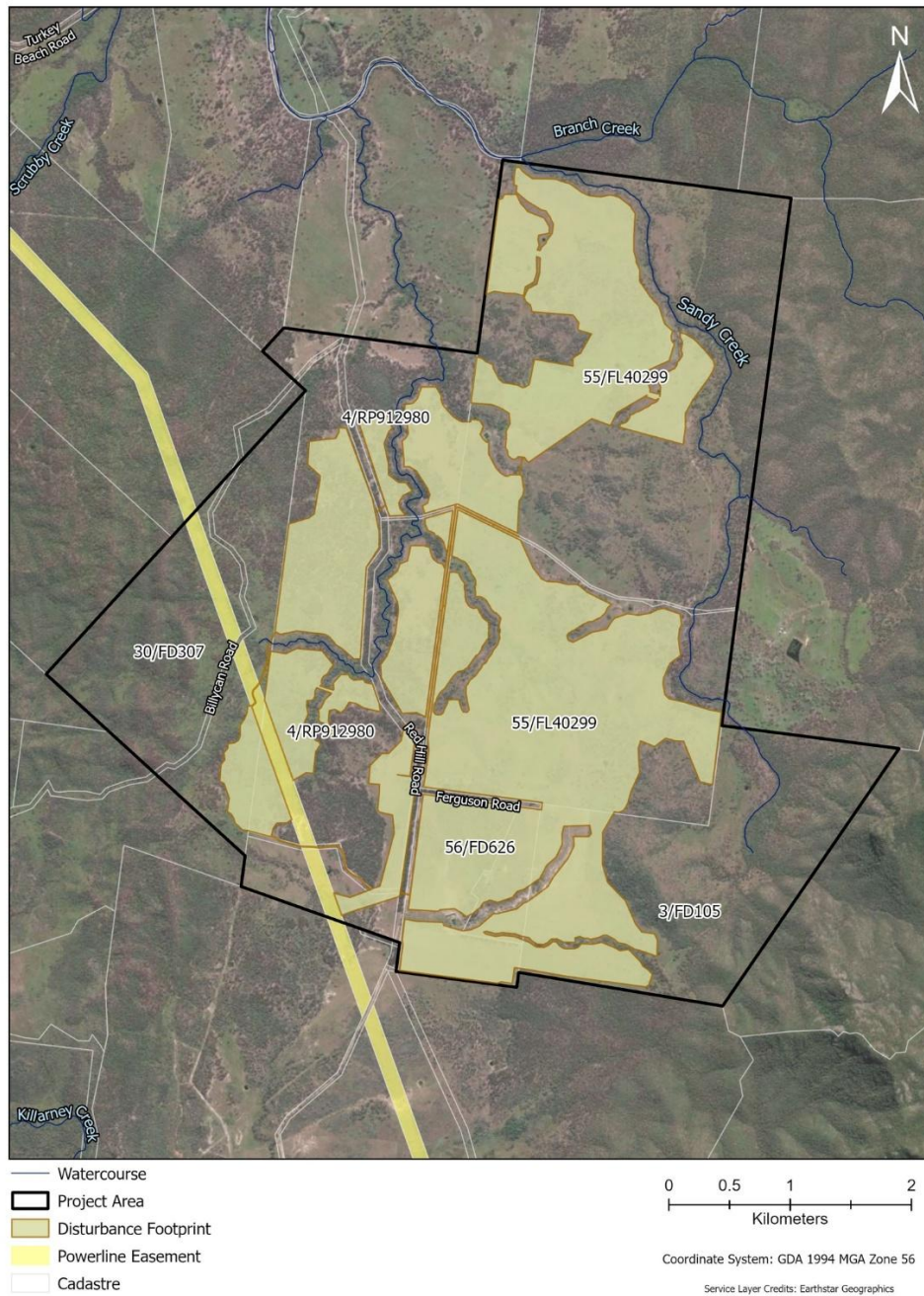


Figure 2: Original ESF disturbance footprint within the project area

Implications of changes to the disturbance footprint

As seen in the table above, impacts to MNES have been substantially reduced. For several MNES (e.g. yellow-bellied glider (south-eastern), *Cycas megacarpa* and Subtropical eucalypt floodplain TEC), there will be no loss of habitat as a result of the newly revised (varied) layout. For other species, habitat loss will be low, with limited removal of habitat coincident with remnant vegetation (i.e. <2.2 ha for koala, grey-headed flying-fox and squatter pigeon (southern), respectively) and the majority of habitat proposed to be removed mapped as non-remnant (comprising, for example, isolated paddock eucalypts of potential value to koala and/or fig (or other fruiting) trees, known to be a viable foraging resource for grey-headed flying-fox). The mapped non-remnant MNES habitat coinciding with the proposed varied disturbance footprint (not including dispersal

habitat for squatter pigeon (southern)), can be seen in red in Figure 3 below, with all other MNES habitat (remnant and high-value regrowth vegetation) coinciding with the footprint in orange.

Under this new development scenario, EPCo believes that significant impacts are unlikely as a result of project activities. Should this variation request be approved, and if the Department agrees with the conclusion of no significant impacts upon adequacy review of the updated PER, it also follows that offsets will no longer be required, as there will be no significant impacts for which liability must be acquitted. These conclusions will be presented and justified in the revised PER.

Project infrastructure and activities

The varied proposed action will continue to facilitate the clearing for and construction, operation and decommissioning of the ESF. Specific activities and infrastructure will 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 350 MW (DC) Solar Array
- 666 MW / 2,664 MWh 4-hour BESS
- On-site Control Building, and operation and maintenance, and warehousing facilities
- Construction and upgrade of access roads (within the proposed varied disturbance footprint)
- Construction of culverts at three separate locations within the disturbance footprint to be aligned with site-specific erosion and sediment controls
- On-site ground works within the proposed varied disturbance footprint to facilitate construction
- Fencing.

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, external and internal roads)
- Waterway crossing and barrier works
- Construction and operation of temporary facilities and permanent infrastructure
- Rehabilitation of temporarily disturbed areas (i.e. those areas required for construction but not operation of the project).

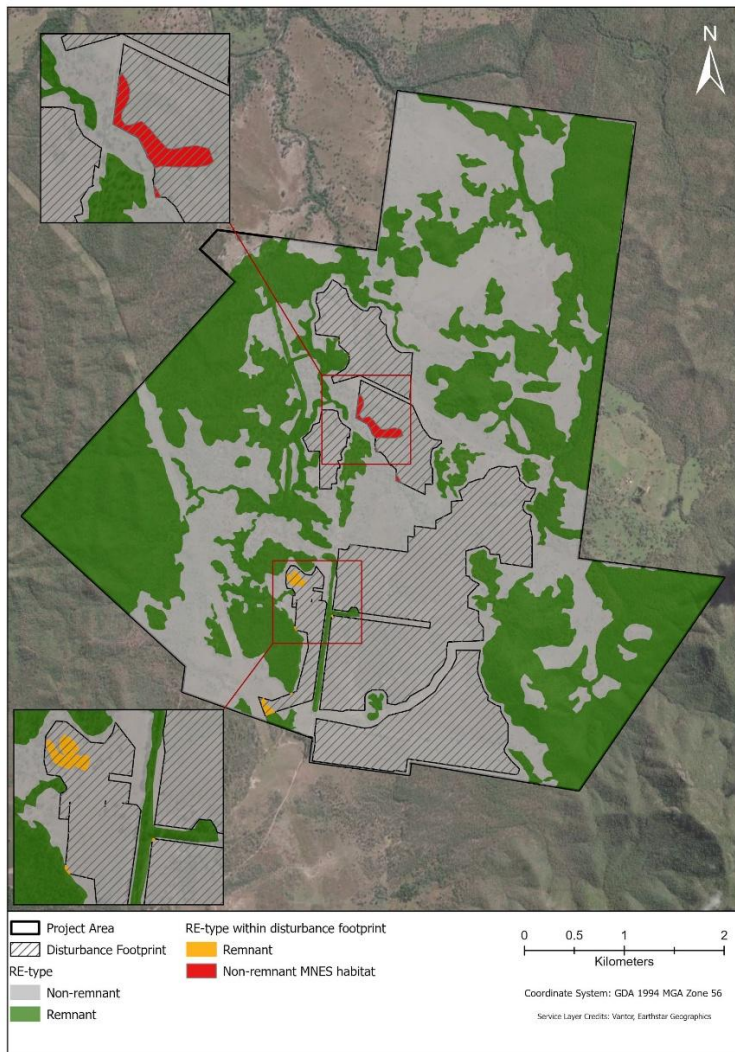


Figure 3: MNES habitat coinciding with the newly revised layout (orange = remnant or high-value regrowth MNES habitat; red = non-remnant MNES habitat)

Next steps and concluding statements

Overall, EPCo considers the newly revised layout of the proposed action (i.e. the focus of this variation request) to be substantially the same as the originally referred action and may be assessed via the current process (EPBC 2024/09802). Upon the Department accepting this variation request, the proponent will update PER documentation in alignment with the changes outlined above. Importantly, these updates will present the case for significant impacts to MNES being unlikely as a result of the project, thus negating the need for offsets, and thus also, the Offset Management Plan previously submitted. Information about the current layout versus the proposed varied footprint will also be included in the PER documentation updates, in relation to feasible alternatives. The PER will then be reissued to the Department for adequacy review to await their decision to issue direction publish.

I trust the above information provides you with the details required to consider this formal request to vary the proposed action under s156A of the EPBC Act. Please send an invoice for the cost recovery fee of varying the action and will pay upon receipt.

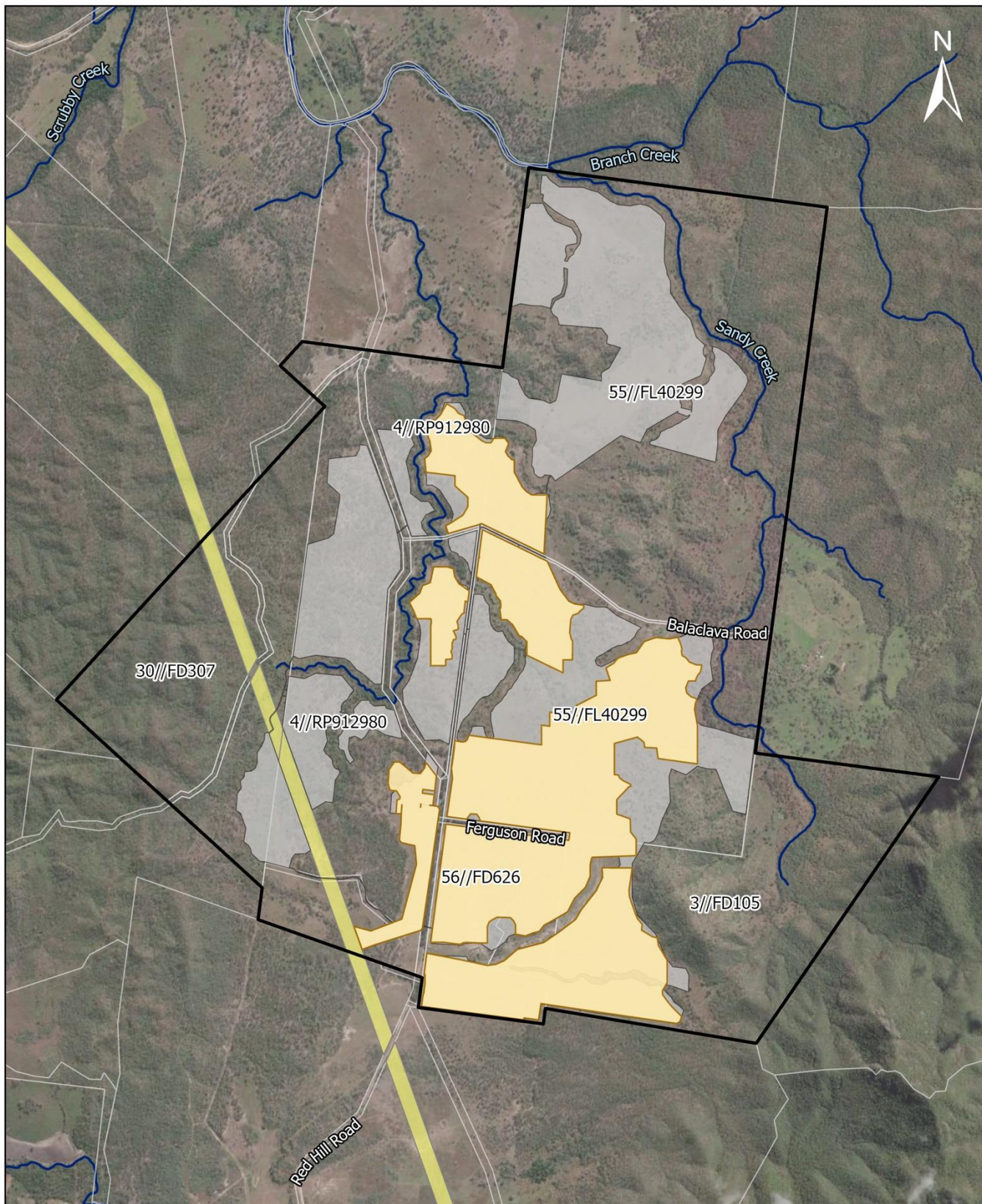
Please contact [REDACTED] if you require additional details:

[REDACTED]
Australian Country Manager, Elements Green

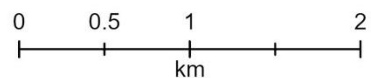
Sincerely,

[REDACTED]
Company Director - Eurimbula ProjectCo Pty Ltd

[REDACTED]



- Watercourse
- Project Area
- Revised Disturbance Footprint
- Original disturbance Footprint
- Easement - Powerline
- Cadastre



Coordinate System: GDA 1994 MGA Zone 56

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