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19 December 2025

Assistant Director - Queensland North Assessments Section
Department of Climate Change, Energy, the Environment and Water
King Edward Terrace
Parkes ACT 2600

**Re: EPBC2024/10026 - Request for variation to proposal to take an action under section 156A of EPBC Act;
Notice to change of person proposing to take action under section 156F of EPBC Act**

Dear [REDACTED],

Introduction

Solquartz Pty Ltd (Solquartz) proposes to construct and operate the Northern Quartz Campus (**NQC**) (formerly Project Green Poly) a sovereign quartz to polysilicon supply chain solution that comprises the following project components:

- Battery Energy Storage System (**BESS**) and substation
- Metallurgical manufacturing facility & biocarbon processing plant
- Polysilicon manufacturing facility.

Situated within the Townsville City Council's (**TCC**) Lansdown Eco-Industrial Precinct (**LEIP**), the Northern Quartz Campus (the **Project**) is located 40 kilometres (km) south of Townsville.

Under *Environmental Protection and Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**), the Project was referred to the Commonwealth Minister for the Environment on 16 October 2024 (EPBC 2024/10026) (**Referral**). The Project was declared pursuant to sections 75 and 87 of the EPBC Act to be a controlled action to be assessed via preliminary documentation on 13 January 2025. The relevant controlling provisions under the EPBC Act relate to listed threatened species and communities (section 18 and 18A).

The purpose of this letter is to:

- (a) request approval to vary the proposal to take an action set out in the referral in accordance with section 156A of the EPBC Act (dealt with in **Part A** of this letter); and
- (b) request to change the person taking the action in accordance with section 156F of the EPBC Act (dealt with in **Part B** of this letter).

PART A – Request to vary proposal

Under regulation 5.08 of the Environment Protection and Biodiversity Conservation Regulations 2000 (Cth) (**EPBC Regulations**), the following information is required in a request to vary a proposal to take an action under s156A of the EPBC Act:

- *details of the proposed variation to the action*
- *the reasons for the proposed variation*
- *how the impacts of the proposed variation on matters of national environmental significance (MNES) compare with those of the original proposal*
- *the impacts of the proposed variation on matters of national environmental significance not considered in the referral or assessment of the original proposal*
- *if applicable, the impacts of the proposed variation on matters of national environmental significance not considered in the referral or assessment of the original proposal, and*
- *if applicable, alternatives, mitigation measures and offsets to compensate for additional impact on matters of national environmental significance.*

The following sections of this letter seek to address the information requirements listed above to support the request to vary the proposal to take an action for associated referral EPBC 2024/10026.

1 Reasons for the proposed variation

1.1 Evolution of delivery approach

The delivery approach underpinning the Referral was based on a single ownership model, with all project components held by Solquartz. Following advice on company and ownership structuring, it was determined that NQC requires a packaged delivery approach supported by dedicated Special Purpose Vehicles (**SPVs**). This approach was identified internally by Solquartz in early-2025 and has since matured into the preferred delivery model for NQC. Its evolution reflects a clearer definition of project components, the need for flexibility across development, and operations, distinct use cases, and well-defined compliance responsibilities.

The packaged approach has been endorsed by Townsville City Council and the Queensland Office of the Coordinator-General who have agreed to consider separate development approval applications for each project component of the NQC.

The proposed variation is necessary to reflect the shift from an integrated delivery model to a packaged delivery model. This change arises from fundamental differences in ownership, operational purpose and technical requirements. The packaged approach enables clear delineation of regulatory and compliance obligations for each project package.

1.2 Rationale for packaged delivery model

The packaged delivery model will assist to address fundamental differences for each of the project components. It has been adopted to ensure clear delineation of responsibilities, reduce delivery risk and improve overall project viability by allowing each component to be developed, operated and governed under a structure tailored to its unique requirements. This is detailed as follows:

- *BESS and substation* - This package represents the infrastructure for energy storage and transmission. It has an independent use case focused on grid stability and energy dispatch, governed by a distinct compliance framework aligned with electricity market regulations. Separate ownership and governance are essential to meet these obligations and maintain operational independence from the manufacturing facilities.
- *Metallurgical manufacturing facility & biocarbon processing plant* – This package involves highly specialised processes requiring advanced technical expertise in metallurgical operations and biocarbon production. These activities are subject to environmental regulatory regimes that differ significantly from those governing the BESS and substation and polysilicon manufacturing infrastructure respectively. A dedicated SPV ensures compliance with these specific requirements and supports separate operational responsibility.
- *Polysilicon manufacturing facility* – Polysilicon production is a complex, high-purity chemical process with stringent safety, environmental and operational requirements. At present, the design is in its early stages and is subject to technical feasibility assessments. Establishing independent ownership and governance for this package enables focused management and design development, technical risks mitigation, progress of feasibility investigations and separation of ownership and compliance obligations.

1.3 Timelines – development and delivery

The transition from a single, integrated delivery approach to a packaged delivery model was driven by the need to accommodate differing project component requirements particularly in relation to timelines, technical support, procurement of plant, and risk profiles. This structure enables critical enabling infrastructure – BESS and substation – to be delivered earlier, supporting the future delivery of associated network augmentation and connection to proposed Powerlink substation. Design maturity across projects is summarised as follows:

- *Battery Energy Storage System (BESS) and substation* – design definition is well advanced, with a high level of maturity and readiness for delivery.
- *Metallurgical manufacturing facility & biocarbon processing plant* – more complex than BESS package with design currently in development and progressing through engineering design phases.
- *Polysilicon manufacturing facility* – design definition is limited subject to feasibility studies planned to be commenced. This component carries the highest level of complexity and the lowest maturity at this time compared to the other packages. Separating this package allows its design to progress through appropriate phases without constraining the delivery of other components.

This approach mitigates risks associated with long lead items and integration complexity, while aligning development timelines with technical and regulatory requirements.

2 Details of the proposed variation to action

Details of the changes from the action proposed in the referral are provided in Table 2.1 below.

Table 3.1 Proposed variation to action

Key theme	Referral approach	Variation approach
Referral Area	<p>Single EPBC referral covering 353 ha, comprised of:</p> <ul style="list-style-type: none"> • 339.32 ha – NQC Project Area • 14.15 ha – Rail Siding 	<p>Based on the delivery model, the referral area (353 ha) is disseminated as follows:</p> <ul style="list-style-type: none"> • NQC Project Area (339.32 ha) <ul style="list-style-type: none"> – 194.15 ha Polysilicon Facility (captured within variation to 2024/10026) – 49.39 ha Supernode North BESS (captured beneath separate referral) – 95.79 ha Metallurgical manufacturing facility & biocarbon processing plant (captured beneath separate referral) • Rail siding (14.15 ha) <ul style="list-style-type: none"> – 14.15 ha TCC Rail Siding Area, Removed <p>This dissemination is shown in Figure 2.1 below.</p>
Project definition and delivery strategy	<p>Single delivery strategy on the basis the NQC development components are dependent on each other</p>	<p>As project definition improved, clear distinct project components emerged with different:</p> <ul style="list-style-type: none"> • Ownership structure (requirement for separate SPVs) • Timelines and maturity levels • Technical complexity • Risk profiles • Delivery sequencing
Proponent	Solquartz Pty Ltd	<ul style="list-style-type: none"> • Solquartz Pty Ltd (noting the proponent is proposed to be changed to Solquartz Poly-Si Pty Ltd per Part B of this letter) <ul style="list-style-type: none"> – Polysilicon Facility captured within the variation to 2024/10026 • Supernode North BESS ProjectCo Pty Ltd <ul style="list-style-type: none"> – Supernode North BESS & Substation (captured beneath separate referral) • Solquartz MG-Si Pty Ltd <ul style="list-style-type: none"> – Metallurgical manufacturing facility & biocarbon processing plant (captured beneath separate referral)

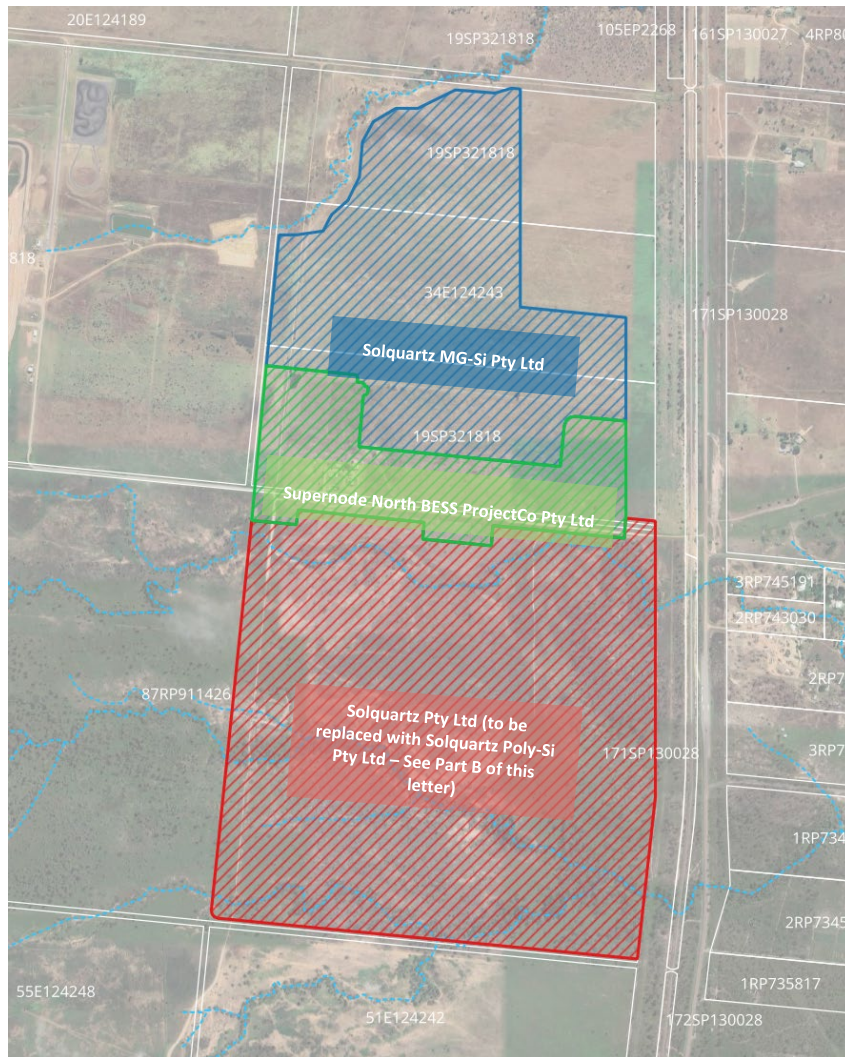


Figure 2.1 Spatial representation of proposed variation and new referral extents

3 MNES comparison and impacts

The relevant controlling provisions under the EPBC Act for the Project were listed threatened species and communities (section 18 and 18A).

The referral for the Project stated that desktop searches indicated that 42 listed threatened species and 18 listed migratory species had the potential to be present in the Project area. During field surveys undertaken throughout 2023 – 2024, Ecologists detected the following fauna species within the project area:

- 91 bird species
- 18 bat species
- Three mammals
- Two reptiles

Following targeted fauna surveys across the project area, the following species were identified within the project area, adjacent to the survey area or conservatively considered based on presence of habitat and/or nearby records:

- Squatter Pigeon
- Bare-rumped Sheathtail Bat
- Rufous Fantail
- Fork-tailed Swift
- Oriental Cuckoo
- Black-throated Funch
- Koala
- White-throated Needletail

In February 2025, following the controlled action determination, DCCEEW issued a ‘further information required’ letter which identified four listed threatened species which may be significantly impacted by the proposed action. A comparison of impacts of the proposed variation on these listed threatened species compared with those identified in the original referral is provided in Table 4.1 below.

Table 4.1 Listed species considered in referral

Listed threatened species and communities	Referral	Proposed variation to action
<i>Geophaps scripta scripta</i> Squatter Pigeon	Confirmed presence at time of referral	No change – all sighting of the Squatter Pigeon were recorded within the varied action area.
<i>Saccolaimus saccolaimus nudicluniatus</i> Bare-rumped Sheathtail Bat	Confirmed presence at time of referral	No change - all sighting of the Bare-rumped Sheathtail-bat were recorded within the varied action area.
<i>Poephila cincta cincta</i> Southern Black-throated Finch	Supporting habitat at time of referral	No change – habitat for this species is mapped within the varied action area.
<i>Phascolarctos cinereus</i> Koala	Supporting habitat at time of referral	No change - habitat for this species is mapped within the varied action area.

The proposed variation seeks to reduce the extent of the impact area from what was originally captured in the referral. The varied referral area is the portion of the site with the most ecological value, as such, there has been no change to the listed of threatened species that are potentially likely to be impacted by the action.

The Preliminary Documentation will consider impacts of the action within the varied area associated with the four species as listed within Table 4.1.

4 MNES not considered in referral

The request to vary related only to the reduction in the referral impact area from 353 ha to 194.15 ha and does not include any new land or proposed activities. Consequently, there is no additional MNES that were not previously considered within the original referral that now need to be contemplated.

Further, the reduction in area also means no further alternatives, mitigations or offsets need to be considered as there are no additional impacts on MNES resultant from the variation request.

5 Assessment against s156B

It is the proponent's view that it is open to the Minister to be satisfied that the character of the varied proposal is substantially the same as the character of the original proposal because:

- no new activities will be added to the proposal – the activities proposed to be carried out as part of the varied proposal would be within the scope of the activities proposed to be carried out as part of the original proposal, albeit some activities would be dropped out of the Referral; and
- the nature and extent of the impacts of the varied proposal are, likewise, within the scope of the impacts of the original proposal, albeit likely reduced. In particular, there will be no additional controlling provisions for the action.

6 Conclusion

Solquartz seeks to vary the proposed action in accordance with Section 156A of the EPBC Act to disseminate the single referral approach for the Northern Quartz Campus and instead pursue a packaged delivery approach. This change is being sought due to the maturing definition of project components, and the requirement for flexibility in development and delivery and compliance which aims to be achieved through separate ownership (via SPVs).

Potential impacts of the dissemination of the single referral will be assessed and documented within the Preliminary Documentation and subsequent new referrals. Notwithstanding this, the evolution and the maturation of the project components descriptions will lead to a reduction in potential impacts to listed threatened species by virtue of a more refined project infrastructure footprint.

We trust the information provided in this letter addresses the requirements of regulation 5.08 of the EPBC Regulations and request that the Commonwealth Minister for the Environment consider and approve the variation request to the proposed action.

Should you have any questions or queries regarding this request, please contact the undersigned at any time.

PART B – Request to change proponent

Under regulation 5.10 of the EPBC Regulations, the following information is required for a notice under subsection 156F(1) of the EPBC Act.

Requirement	Response
The identification number for the action, allocated by the Department	EPBC2024/10026
A brief description or a descriptive title for the action	To construct and operate manufacturing facilities including a metallurgical silicon plant and a polysilicon plant, a biochar processing facility, a battery energy storage system and associated supporting infrastructure, near Townsville, Queensland.
The location of the action	<ul style="list-style-type: none"> part of Lot 19 on SP321818, whole of Lot 34 on E124243 and Part of Lot 87 on RP911426.
The name and contact details of the person who originally proposed to take the action (the <i>first person</i>)	<p>Solquartz Pty Ltd</p> <p>Registered Address: 'Central Plaza One' Level 38, 345 Queen Street, Brisbane QLD 4000</p> <p>Contact Name: [REDACTED]</p> <p>Email: [REDACTED]</p>
<p>A declaration of whether:</p> <p>(i) The first person was exempt from paying the fee mentioned in subregulation 4.02(2), or a fee that would have otherwise been payable under Division 5.6, in relation to the assessment of the impacts of the action, and if so, which fee or fees; or</p> <p>(ii) All or part of the fee mentioned in subregulation 4.02(2), or a fee that would have otherwise been payable under Division 5.6 by the first person, in relation to the assessment of the impacts of the action, was waived, and if so, which fee or fees and the amount of each fee that was waived;</p>	<p>I declare that the first person was not exempt from paying the fee mentioned in subregulation 4.02(2) or a fee a fee that would have otherwise been payable under Division 5.6 in relation to the assessment of the impacts of the action, nor was there any waiver of such fee.</p>
The name and contact details of the person now proposing to take the action (the <i>second person</i>)	<p>Solquartz Poly-Si Pty Ltd</p> <p>Registered Address: 'Central Plaza One' Level 38, 345 Queen Street, Brisbane QLD 4000</p> <p>Contact Name: [REDACTED]</p> <p>Email: [REDACTED]</p>
The second person's ABN.	56 692 310 268
The second person's ACN.	692 310 268

A declaration of whether:

(i) the second person would be exempt from paying the fee mentioned in subregulation 4.02(2), or a fee that would otherwise be payable under Division 5.6, in relation to the assessment of the impacts of the action, and if so, which fee or fees; or

(ii) the second person intends to apply for a waiver of all or part of the fee mentioned in subregulation 4.02(2), or a fee that would otherwise be payable under Division 5.6, in relation to the assessment of the impacts of the action, and if so, which fee or fees.

I declare that the second person is not exempt from paying the fee mentioned in subregulation 4.02(2) or a fee a fee that is otherwise been payable under Division 5.6 in relation to the assessment of the impacts of the action, nor is there an intention by the second person to apply for any waiver of such fee.

Should you have any questions or queries regarding this request, please contact the undersigned at any time.

Yours sincerely

[Redacted]
Associate Environmental Planner
[Redacted]

[Redacted]
[Redacted]
[Redacted]
[Redacted] Solquartz Pty Ltd

Signed by the **second person**:

[Redacted]
Name: [Redacted]
Director, Solquartz Poly-Si Pty Ltd