

July 29, 2020 (revised August 5th, 2020)

Mike Young
Executive Director, Energy, Resources & Compliance
NSW Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street,
Parramatta NSW 2150

Re: **Biodiversity Offset Credits for the Suntop Solar Farm**

Dear Mike,

First, we acknowledge the Department's letter of July 13th providing approval for *Stage 1 - Early TransGrid Substation Works* of the Suntop Solar Farm to begin this month.

As I have discussed with your Department, we are looking at alternatives to buying the 48 credits from the Biodiversity Conservation Trust (BCT) in order to meet the project's biodiversity offset obligations. The necessity for looking at such alternatives is described in our letter to the Department dated July 1st as is the need for more time to identify, analyse and secure the best alternative.

At this stage, we are targeting to issue a full Notice to Proceed for the Suntop Solar Farm on August 28th, 2020.

Canadian Solar have engaged NGH Consulting to evaluate different offset options for the Suntop Solar Farm. Their report is an Attachment to this letter and recommends buying 'like for like' interchangeable PCTs from the Register (Option 1b in their report). Their cover letter states this option is "more aligned with the intentions of the Biodiversity Conservation Act 2016, which gives preference to the establishment of Stewardship Sites to meet offset obligations." As shown in their report, identifying, investigating, potentially surveying and securing the credits could take until May, 2021.

The Suntop Solar Farm's Conditions of Consent (item 12) states:

"Prior to the commencement of construction, unless otherwise agreed by the Secretary, the Applicant must retire the biodiversity credits specified in Table 1 below to the satisfaction of OEH."

Canadian Solar respectfully requests the Secretary to exercise their discretion to allow the Suntop Solar Farm to meet its offset obligations to the satisfaction of OEH by May 31st, 2021 to enable the construction of the Suntop Solar Farm to proceed to full construction in late August. If suitable 'like-for-like' interchangeable PCTs are not able to be secured from the Register by this date, then Canadian Solar will retire the necessary credits by Paying into the Biodiversity Conservation Trust Fund (Option 2 in the attached report).

We look forward to your response. If you have any questions in the meantime, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Upson".

Jonathan Upson
Director Project Development and Origination

cc. Iwan Davies
Natasha Homsey

Attachment: *20-424 Suntop Solar Farm Offset Investigations SSD 8696 v2* - NGH Consulting
