

ABN 70 250 995 390

**180 Thomas Street, Sydney**  
PO Box A1000 Sydney South  
NSW 1235 Australia  
T (02) 9284 3000  
F (02) 9284 3456

Thursday, 20 November 2025

Kiersten Fishburn

NSW Department of Planning, Housing and Infrastructure

Copy to:

Biodiversity Conservation Trust (BCT)

Conservation Programs, Heritage and Regulation (CPHR)

NSW Department of Climate Change, Energy, the Environment and Water

**Author:** Vivian Hamilton  
Offsets Program Manager

**Reviewer/** Daniel Whaite  
**Approver:** Biodiversity Manager

Dear Kiersten

## Re: Six-Monthly Update Report – HumeLink Biodiversity Offset Package

This letter provides the required six-monthly update report on the implementation of the Biodiversity Offset Package (BOP) for the HumeLink Project, in accordance with Condition B26(d) of the Infrastructure Approval. It summarises progress made since approval of the updated BOP on 19 May 2025.

## Overview

---

Construction of HumeLink East and HumeLink West commenced on 25 and 26 September 2025 respectively. The Project's total offset obligation is **167,534 biodiversity credits**, comprising:

- **15,128 ecosystem credits**
- **152,406 species credits** following reductions identified through post-approval surveys and the initial Biodiversity Assessment Verification Report (BAVR)

A bank guarantee of **\$502,332,107** has been lodged in accordance with Condition B27.

## Progress on Biodiversity Conservation Measures

---

Substantial progress has been made across all components of the offset strategy, including credit acquisition pathways, post-approval surveys, and advancement of Biodiversity Stewardship Agreements (BSAs).

## Post-Approval Surveys & BAVR

- The initial BAVR has been completed and submitted following additional surveys detailed in the Supplementary Biodiversity Strategy (SBS).
- These surveys have reduced the species credit liability from **232,223 to an estimated 152,406 credits**, reflecting more accurate presence/absence data and updated habitat assessments
- The majority of the remaining ~152,406 species credits comprise assumed presence
- The Final Layout Plan (FLP) BAVR is scheduled for submission in early 2026, after final design is confirmed. The FLP BAVR will confirm the final species credit liability reduction achieved by supplementary survey

## Biodiversity Stewardship Agreements (BSAs)

Five BSA sites are progressing through assessment and contract stages as detailed in Table 1. The total projected ecosystem credits ('pipeline' credits) from proposed BSA sites is **11,615 credits**. Work continues with landholders to finalise BSA submissions and progress to submission in Q2 2026.

**Table 1: BSAs, pipeline credits and status**

BSA Site	Area (ha)	Pipeline Ecosystem Credits	Status
Michelago	1,020	3,134	Initial landholder agreement in place, biodiversity credit transfer deed awaiting Transgrid execution. Field surveys and assessment underway
Nangus	1,015	4,011	Initial landholder agreement in place, biodiversity credit transfer deed in progress. Field surveys and assessment underway
Adaminaby	390	1,172	Initial landholder agreement in place, biodiversity credit transfer deed in progress. Field surveys and assessment underway
Numeralla	1,445	2,695	Initial landholder agreement in place, biodiversity credit transfer deed in progress. Field surveys and assessment underway
Adelong	269	603	Initial landholder agreement in place, biodiversity credit transfer deed in progress. Field surveys and assessment underway
<b>Total</b>	<b>4,139</b>	<b>11,615</b>	

## Existing Credits & Market Purchases

- Transgrid currently holds **1,503 ecosystem credits** and **1,361 species credits** (895 in the final stages of approval), available for future retirement once the FLP BAVR confirms final credit obligations.
- Transgrid is finalising agreement to purchase **195 market credits** (155 ecosystem, up to 40 species)
- Additional market engagement continues, including discussions with credit holders and participation in Biodiversity Credit Supply Fund processes.

## Prescribed Biodiversity Offset Measures

- Transgrid to engage with DCCEEW regarding potential **SODA options** should residual offsets remain after the primary conservation measures are exhausted.

## Updated Offset Status

---

### Ecosystem credits:

- Required: **15,128 (\$91.5M** in equivalent Biodiversity Conservation Fund (BCF) payment)
- Identified/committed supply: **13,273**
- Outstanding: **1,855 credits worth a total of \$13.2M** in equivalent BCF payment

### Species credits:

- Required: **152,406 (\$261.0M** in equivalent BCF payment)
- Identified/committed supply: **1,401**
- Outstanding: **151,005 credits worth a total of \$259M** in equivalent BCF payment

## Forward Actions (Next 6 Months)

---

- Finalise FLP BAVR (early 2026).
- Progress all five BSA sites to BSA submission.
- Continue market engagement and reasonable steps under the offset rules.
- Commence engagement re: potential SODA with DCCEEW to deliver outstanding offset.
- Prepare next 3-monthly update (due February 2026)
- Prepare next 6-monthly update (due mid-2026).
- Confirm remaining offset measures, consistent with Condition B26(e), or agree alternate timing or pathway with the Planning Secretary to ensure delivery of best-practice biodiversity offset outcomes

## Conclusion

---

Transgrid is continuing to implement all biodiversity conservation measures required under the approved BOP. We welcome continued engagement with DPHI, CPHR and the BCT as the offset program progresses.

Please contact us if any further detail or clarification is required.

Sincerely,

**Vivian Hamilton**

**Offsets Program Manager | Stakeholder and Corporate Affairs**