



Office: 90 Gap Road Alice Springs NT
Mail: PO Box 2796 Alice Springs 0870 NT
Web: www.alec.org.au
Phone: 08 89522497
Email: policy@alec.org.au

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ALEC Submission on SunCable's draft terms of reference

The Arid Lands Environment Centre (ALEC) is central Australia's peak environmental organisation that has been advocating for the protection of nature and ecologically sustainable development of the arid lands since 1980.

ALEC welcomes the opportunity to respond to SunCable's proponent initiated EIS referral and draft Terms of Reference. As advocates of deep decarbonisation and the expansion of renewable energy, ALEC supports the SunCable development with conditions. ALEC recognises the multi-scalar nature of energy transitions and the importance of both large-scale and small-scale renewable energy generation in mitigating the impacts of climate change.

ALEC also has a firm view that environmental development cannot just be tied to economics and carbon savings. As a result, this submission outlines four key priority areas that SunCable should incorporate into their development. The submission focuses on: community; Aboriginal culture; environment; and, economy.

Community

ALEC's support of the development is conditional on local benefit. It is vital that a development of this scale provides opportunities and investment into nearby local economies, not just to stakeholders in Singapore and other ASEAN countries. It is important that the SunCable development guarantees electricity supply to power the Darwin-Katherine Grid with affordable and reliable renewable energy, with the potential to also power the Tennant Creek grid. Additionally, it is essential that the development prioritises and provides safeguards for local jobs from nearby towns and remote Aboriginal communities. Too often large-scale developments in the resources and energy sector ignore the communities in which their projects are based. It is vital that local benefits in terms of jobs, investment and affordable energy are embedded into the project design, as well as ways the community can participate in the developmental process.



Aboriginal Culture

The benefits of the SunCable development should extend to supporting local Aboriginal communities as a matter of priority. ALEC considers it essential that the development engage with Traditional Owners and the local Aboriginal community, and recognise their sovereignty to the land.

SunCable should support local Aboriginal ranger groups and the Northern Land Council to manage the disturbed site. Acknowledging the need for expert and ongoing land management in the development zone.

Additionally, SunCable should ensure that a rigorous Cultural and Heritage assessment is completed as part of their Environmental Impact Assessment. The protection of sacred sites and species should be prioritised in the development. The ongoing destruction and desecration of Aboriginal culture by corporations is strongly opposed.

Environment

The SunCable development will result in the clearing of a huge amount of land. It is vital that ecologically significant species and ecosystems are identified, and to the greatest extent possible, preserved. If ecologically important land is cleared, ALEC considers that it is vital that best practice biodiversity offsets are implemented. This project should ensure that environmental degradation is minimised as far as possible, and it does not become a blight upon the land.

In addition, as the SunCable development will construct the largest solar farm in the world, it is integral that the full life-cycle impacts of the development are managed up front. ALEC sees that it is critical that SunCable work with the Northern Territory Government and relevant industry to ensure that a state of the art solar panel recycling centre is established. With the development likely to include hundreds of thousands, if not millions of solar panels - these resources must not become toxic waste.

Economy

ALEC seeks that Northern Territory Government work with SunCable to ensure their solar farm is integrated into a larger Northern Territory renewable energy action plan. Key priorities include the Territory Government investigating the feasibility of local manufacturing to play a greater role in renewable energy developments. In addition, for the Territory to support local manufacturing, by committing to a commercial solar panel recycling facility. Additionally, the Northern Territory Government integrates and prioritises the SunCable development into their electric superhighway, connecting Darwin and Alice Springs via a



HVDC transmission line. It is important that the Northern Territory Government works with the SunCable development to support local jobs and industries. In addition, the Territory Government uses this opportunity to scale up the Territory's renewable energy transition, building off their successful 'Roadmaps to Renewables' framework.

ALEC's Conditions:

1. The SunCable development guarantees electricity supply for the Darwin-Katherine Grid, with the potential to also power the Tennant Creek grid - ensuring affordable and reliable electricity for Territorians;
2. Embed local benefit into the project, with safeguards in place promoting local employment, including local Aboriginal employment;
3. Invest in, support and provide electricity to nearby communities, including remote Aboriginal communities and provide a pathway for these areas to participate in the developmental process;
4. Conduct a best practice Cultural and Heritage Assessment, ensuring sacred sites are identified and protected;
5. Support local Aboriginal ranger programs to manage the disturbed site, acknowledging the need for expert and ongoing land management;
6. Identify and protect ecologically significant communities and species;
7. Where destruction cannot be prevented, that best practice biodiversity offsets are implemented, ensuring the development is not a blight on the land;
8. SunCable works with the Northern Territory Government and industry to implement a commercial solar panel recycling facility;
9. SunCable where feasible, source their materials and parts from Northern Territory manufacturers;
10. The Northern Territory Government scale up their renewable energy objectives, incorporating the Suncable development into a holistic approach to transition;
11. The Northern Territory Government investigate the feasibility of local manufacturing to play a greater role in the Territory's renewable energy developments; and,
12. The electricity superhighway feasibility study incorporates the SunCable development, making the Darwin to Alice Springs HVDC transmission line a matter of priority.



Alexander Vaughan (Policy Officer)

