Submission on Supplement to Draft EIS

AA Powerlink Assets Pty Ltd - AA Powerlink Project

This submission is made under regulation 140 of the Environment Protection Regulations 2020

Government authority: Aboriginal Areas Protection Authority (AAPA / the Authority)

Section of Referral	Theme or issue	Comment
13.4.2.3	Aboriginal sacred sites	The supplement to the draft EIS states that the proponent has applied to AAPA for Authority Certificates to cover the entire project footprint.
		AAPA has received 12 Authority Certificate applications from the Sun Cable Pty Ltd. The applications cover the Powell Creek area, the railway corridor, the transmission line corridor near Darwin, the infrastructure at Murrumujuk, the Subsea Cable in NT waters and two proposed electrode sites.
		The proponent has submitted subsequent variations to OHTL sections. AAPA is awaiting confirmation from the proponent to finalise the project's spatial data.
		However, there are some discrepancies between the spatial data provided in the supplement to the draft EIS and the most recent spatial data provided by the proponent to AAPA.
		AAPA notes that the Darwin converter site preferred electrode area of interest (see Attachment A) is larger than the area applied for in the Murrumujuk application (AAPA reference 202216640). AAPA recommends amending the subject land in this application if the Darwin converter site preferred electrode area of interest area is intended to form part of the project footprint.
		AAPA also notes that the OHTL alternate options around Adelaide River, Pine Creek and Katherine have not been included in the Authority Certificate applications. Similarly, spatial data for the Darwin converter site alternate electrode area of interest and the Powell Creek alternate electrode area of interest are outside the AAPA application areas.
		AAPA recommends amending the relevant applications for Authority Certificates at the earliest opportunity if these areas are intended to form part of the project footprint.
13.4.8; 13.4.10	Direct impact to heritage features	The proponent states that "there are no known sacred sites in the proposal footprint however, it is possible that sacred site clearance surveys will identify previously unrecorded sites."

		The Authority notes that there are recorded and registered sacred sites within the proposal footprint. As such, the Authority recommends amending this section of the proposal to note that there are known recorded and registered sacred sites in the proposal foot print.
Appendix 8.4	Spoil	Disposal sites identified by the proponent in NT territorial waters should be included in the current Subsea Authority Certificate
2.2.2	disposal	application. This has been communicated to the proponent and AAPA is awaiting subsequent amendment.
4.2.2		

Attachment A



Authority Certificate application area (in blue) and Darwin converter site preferred electrode area of interest (in white).