

Ms Kylie Fitzpatrick  
Department of Environment, Parks and Water Security  
GPO Box 3675  
Darwin NT 0801



Dear Ms Fitzpatrick

**Re: Significant variation - Referral (Proponent Initiated EIS) - Sun Cable Australia-ASEAN Power Link**

The Department of Environment, Parks and Water Security (DEPWS) has assessed the information submitted for the above significant variation and provides the following comments:

**Flora and Fauna Division**

Section of Referral	Theme or issue	Comment
Notice of Significant Variation – section 4.1.2.1 OHTL Utilities Corridor	LAND: Terrestrial Ecosystems	<ul style="list-style-type: none"> <li>The proposed habitat quality surveys along the length of the corridor are not designed to determine presence/absence of threatened species (flora and fauna). Targeted surveys, at times appropriate for detection of target species, are required to determine presence/absence in areas where suitable habitat have been identified.</li> </ul> <p>The Mapping the Future program mapped sensitive and significant vegetation for Gunn Point and south to Black Jungle Conservation Reserve. The utilities corridor runs through the eastern portion of the Priority Protection Area established in the Howard Sandplains Site of Conservation Significance, Black Jungle Conservation Reserve and areas identified as having high biodiversity value (including wetlands, sand sheet heaths, and rainforests) (Stokeld et al. 2020<sup>1</sup>). It is recommended that areas identified as having high biodiversity value be avoided from direct impact (clearing) and appropriate native vegetation buffers applied to sensitive</p>

<sup>1</sup> Stokeld et al. (2020). Mapping the Future project - Gunn Point. Biodiversity Assessment of the Gunn Point Area. Technical Report 4/2020, Department of Environment and Natural Resources, Darwin, NT

Section of Referral	Theme or issue	Comment
		significant vegetation communities as per the Land Clearing Guidelines. Indirect impacts to these habitats should also be assessed.
Notice of Significant Variation – section 4.1.2.2 Darwin Converter Site	LAND: Terrestrial Ecosystems	<ul style="list-style-type: none"> <li>Stokeld et al. 2020 identified there are several point localities of high density stands of <i>Cycas armstrongii</i>, as well as suitable habitat for this species, recorded in and adjacent to the footprint of the proposed converter.</li> </ul> <p>It is recommended that the proponent avoids those parts of the site with higher densities of this species when planning the site layout.</p>
Notice of Significant Variation – section 4.1.7.1 Marine communities	SEA: Marine Ecosystems	<ul style="list-style-type: none"> <li>The assessment of significance of impacts should include macro-algae as well, as they are important for maintaining trophic structure. Seagrass, coral, and macro-algae are all primary producer habitats playing an important role in the food chain. Not only the presence, but the extent of these habitats, should be ascertained during geophysical surveys in order to assess impacts.</li> </ul>
Notice of Significant Variation – Table 4-5	LAND: Terrestrial Ecosystems	<ul style="list-style-type: none"> <li>Clarification is sought regarding the meaning of the following: “OHTL corridor will be reinstated post-construction with only a 12m wide access required in long term”.</li> </ul> <p>Please clarify the clearing requirements for the corridor during both construction and ongoing maintenance operations.</p>
Terms of Reference – Table 5: Minimum information required for assessment of Terrestrial ecosystems	LAND: Terrestrial Ecosystems	<ul style="list-style-type: none"> <li>Dot point 2 in the ‘Potential impacts and risks’ section of Table 5 should not be limited to assessing the indirect disturbance or degradation to flora and vegetation. The Flora and Fauna Division recommends that the dot point be amended to “Indirect disturbance or degradation to flora/ecological communities, including significant and sensitive habitats, possibly resulting in a long-term decline or loss over time, for example from erosion, dust, weeds/pathogens, disturbance of acid sulfate soils, alterations to hydrological regime, etc.”</li> </ul>

### Water Resources Division

No further comments required. All comments previously provided to the proponent relating to water resources remain the same for this significant variation of the project.

## **Environment Division**

### **Environmental Authorisations**

Previous comments remain relevant.

### **Environmental Operations**

Previous comments provided for the original development are still valid. References to the locations of the Darwin Converter Site and Cable Transition Facilities must be updated to Murrumujuk.

Changes to the proposal will not result in any changes to the significance of potential impacts identified in the original proposal.

Changes to the draft Terms of Reference sufficiently address changes in requirements as a result of the variation.

## **Parks and Wildlife Division**

Previous comments for the original development are still relevant.

The Black Jungle Conservation Reserve contains significant environmental and cultural values, and supports suitable habitat for a number of threatened flora and fauna species such as *Ptychosperma macarthurii*, *Typhonium praetermissum* and *Stylidium ensatum*.

The potential risks outlined in the significant variation should be assessed at the level of an Environmental Impact Statement (EIS).

Should you have any further queries regarding these comments, please contact Maria Wauchope by email [maria.wauchope@nt.gov.au](mailto:maria.wauchope@nt.gov.au) or phone (08) 8999 3692.

Yours sincerely



Luis Da Rocha  
Executive Director, Rangelands

24 September 2021