



24 September 2021

Northern Territory Environment Protection Authority  
Level 1  
Arnhemica House  
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PARAP NT 0801

Mode of delivery

Email to: [ntepa@nt.gov.au](mailto:ntepa@nt.gov.au)

To Whom it May Concern,

**Sun Cable Pty Ltd – Australia-Asean Power Link Project**  
***Environment Protection Act (NT) referral - variation***

The Environment Centre NT (ECNT) is the peak community sector environment organisation in the Northern Territory of Australia, raising awareness amongst community, government, business and industry about environmental issues and assisting people to reduce their environmental impact and supporting community members to participate in decision-making processes and action.

Thank you for the opportunity to provide a comment on the variation of the referral (**Referral**) of Sun Cable Pty Ltd's (**Sun Cable**) Australia-ASEAN Power Link Project for assessment under the *Environment Protection Act NT (2020)*.

Due to workload and resourcing constraints, it has not been possible to provide a comprehensive submission on the Variation or the amended Terms of Reference.

However, ECNT advises that it has been engaged for many years in work to protect the Gunn Point Peninsula's environmental, social and cultural values, often in response to development proposals in the area. For over thirty years, ECNT's position has been that we do not support development of industry at the Gunn Point and Glyde Point peninsula.

ECNT wishes to emphasise the immense social, cultural and environmental values of Gunn Point Peninsula, where part of Sun Cable's project will now be sited. It is imperative that rigorous assessment of these values, and any impacts on them, occurs as part of the environmental impact assessment. It is also imperative that Sun Cable engage early, often and constructively with a wide variety of stakeholders with an interest in Gunn Point, including but not limited to Traditional Owners of the area, and preferably to obtain their free, prior and informed consent to the project.

To assist Sun Cable, and the NTEPA, in refining the amended Terms of Reference and the environmental impact statement, ECNT provides the following previous submissions prepared by ECNT and its alliance partners in relation to proposed development or land use changes in the Gunn Point/Glyde Point area:

- (a) ECNT Submission to NT Planning Commission regarding proposed updates to the Litchfield Subregional Land Use Plan dated 29 August 2020;
- (b) Keep Top End Coasts Healthy Submission to NT Planning Commission regarding proposed updates to the Litchfield Subregional Land Use Plan dated 28 August 2020; and
- (c) Australian Marine Conservation Society and ECNT document entitled “An assessment of the conservation values of the Gunn Peninsula/Vernon Islands area and the impacts of the proposed Glyde Point heavy industry and residential estate” dated 2006.

Yours faithfully,

Shar Molloy and Kirsty Howey

Co-Directors