



2025 Annual Compliance Report

EPBC2020/8818 Australia-Asia PowerLink Project

Approval holder: AAPowerLink Assets Australia Pty Ltd

Reporting period: 19 August 2024 to 18 August 2025



Document revision history

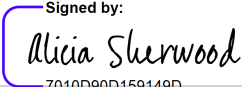
Rev	Status	Date	Prepared by	Position	Reviewed by	Position
A	For Review	11/08/25	Kylie Welch	Development Mgr Environment	Alicia Sherwood	General Mgr Development
00	For Issue	27/08/25	Kylie Welch	Development Mgr Environment	Alicia Sherwood	General Mgr Development

Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed

Signed by:



7010D90D159149D...

Full name

Alicia Sherwood

Position

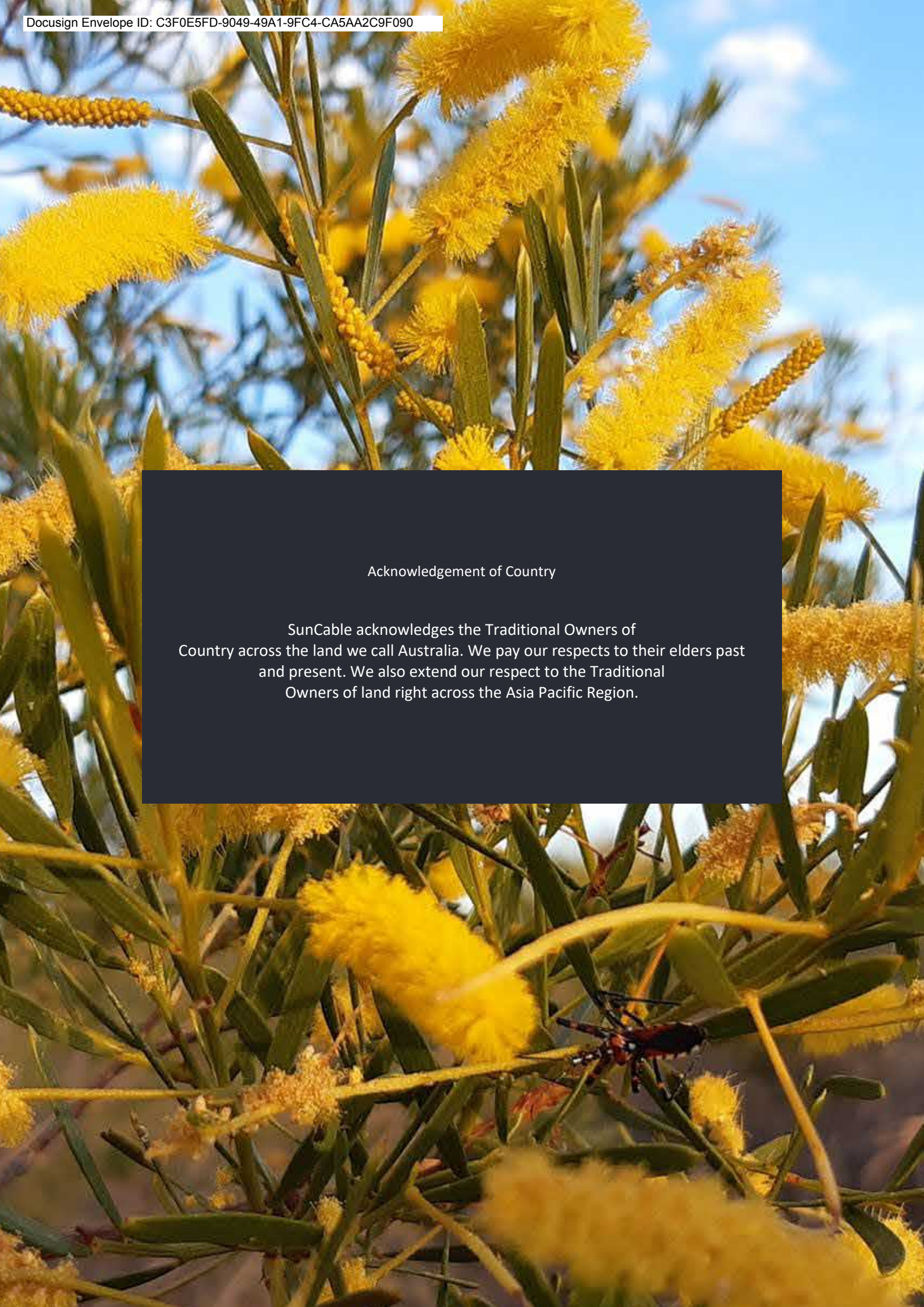
General Manager, Development, Operations and Aboriginal Affairs

Organisation

AAPowerLink Australia Assets Pty Ltd ACN: 653 396 948

Date

27 August 2025 | 12:37 PM AEST



Acknowledgement of Country

SunCable acknowledges the Traditional Owners of Country across the land we call Australia. We pay our respects to their elders past and present. We also extend our respect to the Traditional Owners of land right across the Asia Pacific Region.

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1 Introduction

The Australia-Asia PowerLink Project (EPBC 2020/8818) proposes to construct and operate a large-scale solar generation site in the Barkly region of the Northern Territory (NT) and transmission infrastructure to send renewable energy from the generation site to customers in Darwin and Singapore. The proposed action was referred under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)* and the NT *Environment Protection Act 2019* in late 2020. An Environmental Impact Statement (EIS) was prepared and assessed under the Bilateral Agreement between the NT and Commonwealth Governments. The proposed action was approved by the NT Government on 14 July 2024 and by the Commonwealth Government on 19 August 2024.

This Compliance Report has been prepared to satisfy EPBC approval condition 28 which requires the approval holder (AAPowerLink Australia Assets Pty Ltd) to prepare a compliance report for each Annual Compliance Report period. The report has been prepared in accordance with the *Annual Compliance Report Guidelines*, Commonwealth of Australia 2023. Copies of the approvals and compliance documents are published on the SunCable website <https://www.suncable.energy/>.

2 Proposed Action

The Australia-Asia PowerLink Project (EPBC 2020/8818) approved action encompasses the following components:

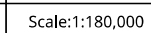
- 12,000ha solar generation and energy storage precinct, with ancillary infrastructure, on Powell Creek Station, near Elliot in the Barkly Local Government Area.
- High-voltage direct current transmission system including ~800km of Overhead Transmission Line (OHTL) from Powell Creek to the Darwin Converter Site (see below).
- Darwin Converter Site (DCS) incorporating up to four voltage source converters, batteries, substations and infrastructure, at Murrumujuk on Gunn Point Peninsula, north-east of Darwin in the Litchfield Local Government Area.
- Cable Transition Facility adjacent to the DCS comprising an underground cable corridor, permanently fenced land sea joint station and shoring crossing site.
- Subsea cable system section in NT waters and the Commonwealth Marine Area.

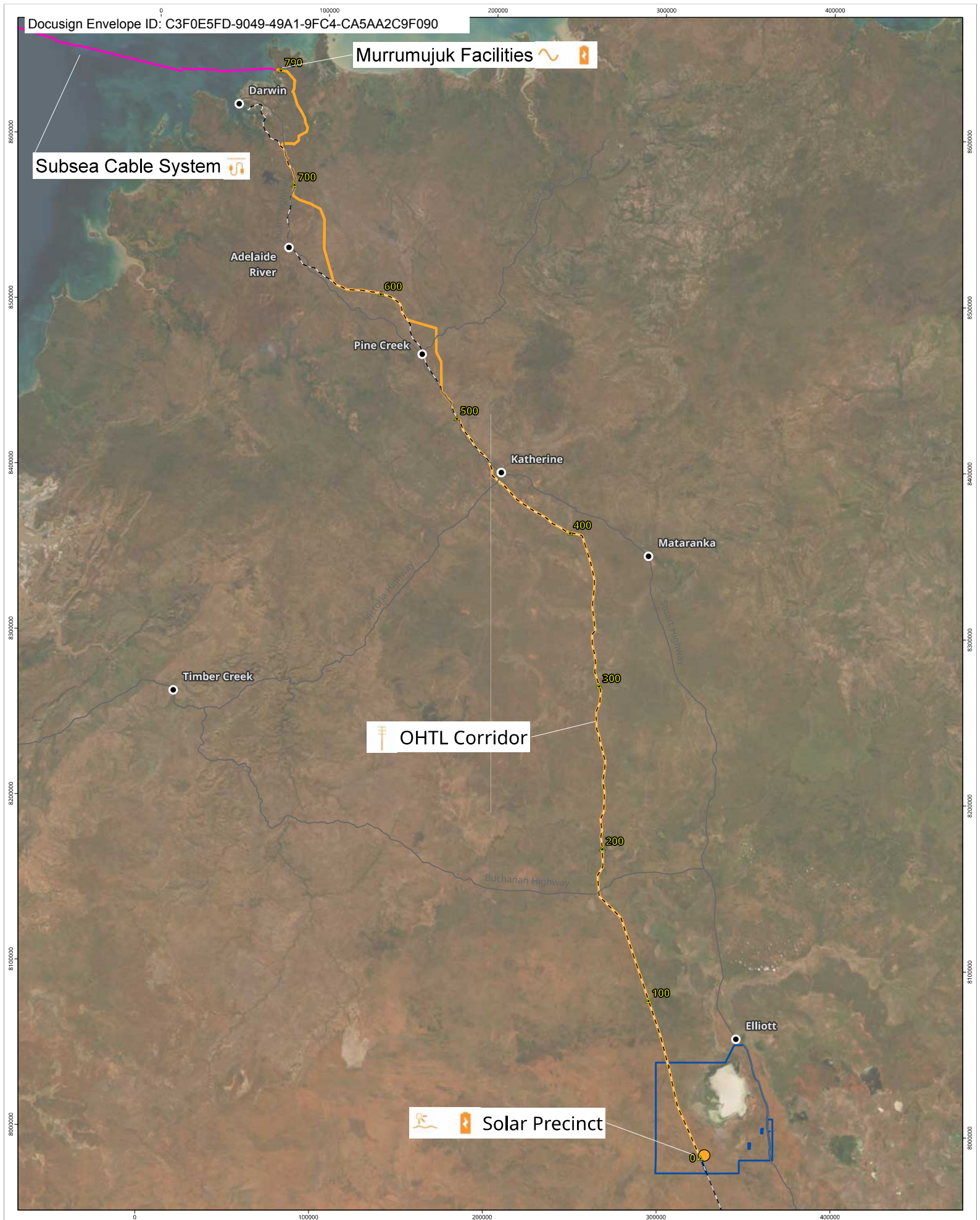
The approved Action Area for each component is shown in Figures 1-4.

3 Activities this reporting period

SunCable has not yet commenced the action. During the reporting period, there have been no activities undertaken by SunCable in the Action Area and no documents submitted to the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

SunCable is currently in the development phase of the AAPowerLink project life cycle. During the reporting period, activities have focussed on optimising the system design, securing land and approvals and negotiating offtake agreements.





Legend

- Kilometre Points
- AAPowerLink Infrastructure
- Overhead Transmission Line
- Subsea Cable System
- Powell Creek Station
- Highway
- Railway Line
- Town



Overhead Transmission Line

Project: Australia-Asia PowerLink

0 20 40 60 80 Kilometres

Scale: 1:2,000,000 Datum: MGA Zone 52

Coordinate System: GDA2020 A3

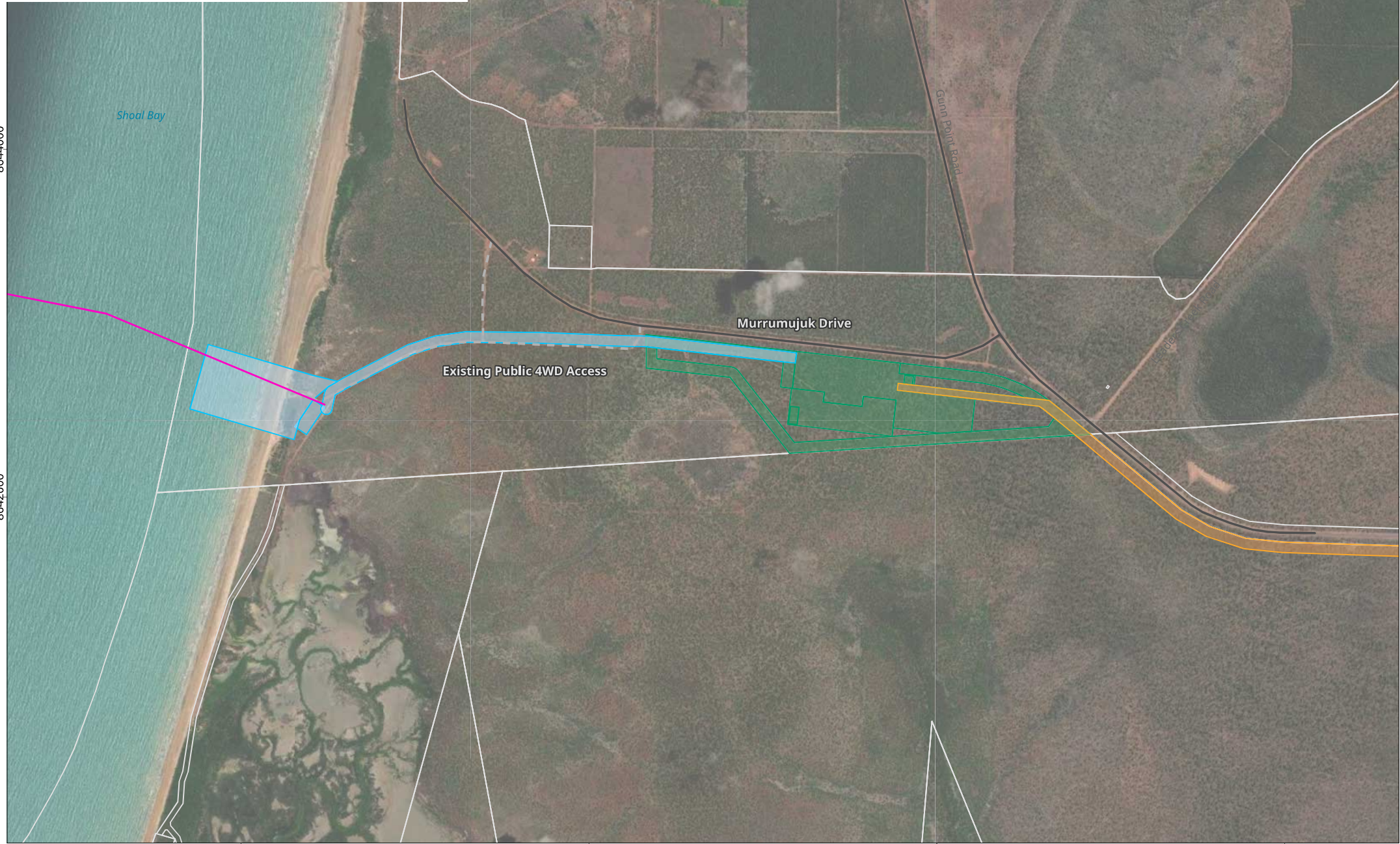
Reference #: AAPL_GNR_CTA_GEN_MAP_0654

Date: 12/04/2024 Figure: 2 of 4 Revision: A



Source: Earthstar Geographics

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Legend

- Subsea Cable System
- Public 4WD Access
- Road
- OHTL Corridor
- Cable Transition Facilities
- Darwin Converter Site
- Cadastre



Darwin Converter Site and Cable Transition Facilities

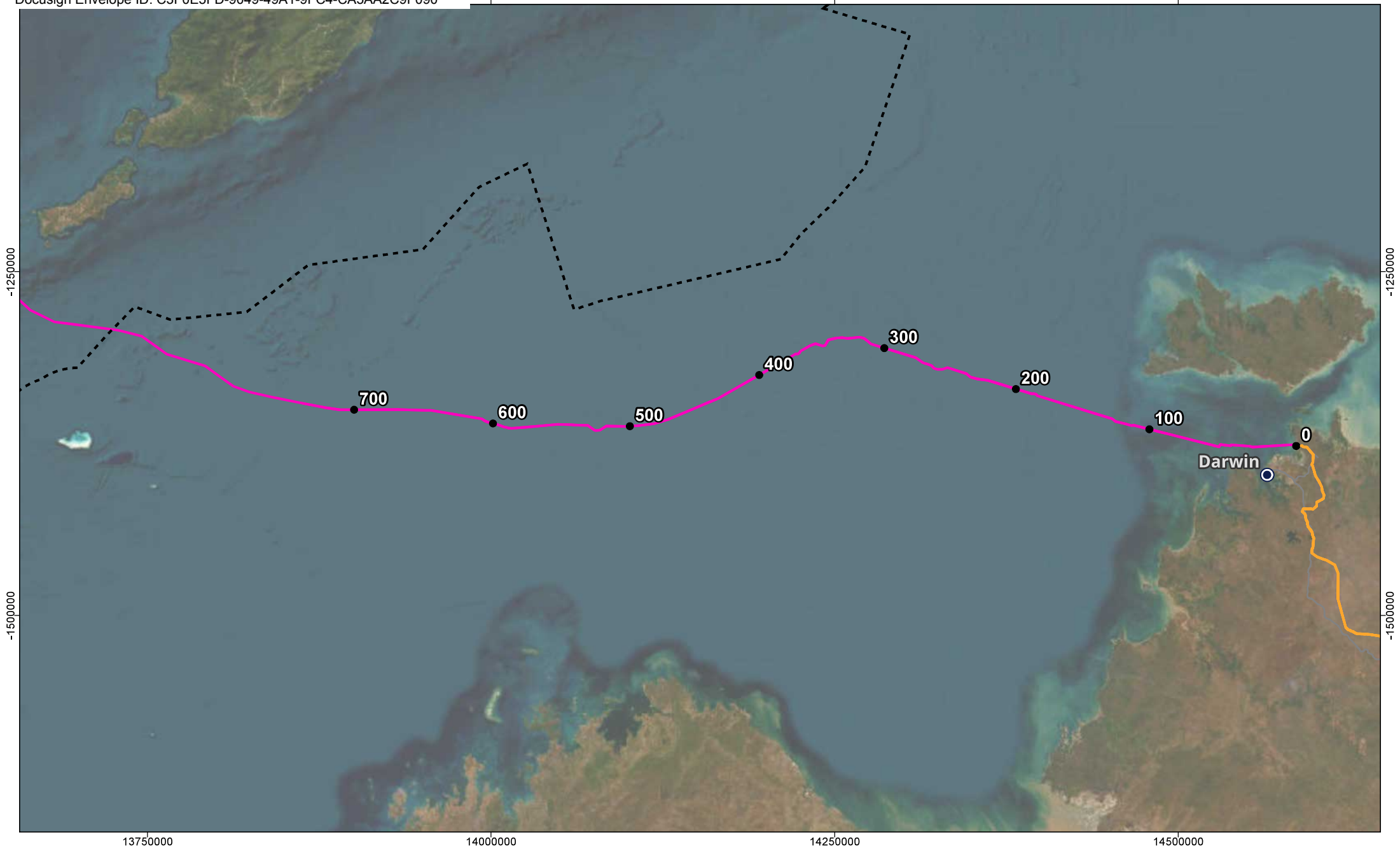
Project: **Australia-Asia PowerLink** Reference #: AAPL_GNR_CTA_GEN_MAP_0655 Figure: 3 of 4 Revision: A

Coordinate System: MGA 52 Datum: GDA2020 Date: 12/04/2024

0 250 500 750 1,000 1,250 Metres

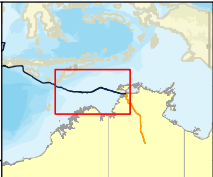
Scale: 1:20,000 A3





Legend

- Kilometre Points
- Subsea Cable System
- - Commonwealth Marine Area
- Land Based AAPowerLink Infrastructure



Subsea Cable System

Project: **Australia-Asia PowerLink** Reference #: AAPL_GNR_CTA_GEN_MAP_0653 Figure: 4 of 4 Revision: A

Coordinate System: - Datum: WGS84 Date: 3/04/2024

0 20 40 60 80 100 Kilometres

Scale: 1:3,500,000 A4



Source: NTG data - Cadastre and roads, Imagery: Source: Esri, TomTom, FAO, NOAA, USGS, Earthstar Geographics
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4 Approval conditions and compliance

Table 2-1 lists each of the approval conditions that apply to the AAPowerLink Project EPBC2020/8818 as per Annexure A of the Approval Decision dated 19 August 2024.

The following designations have been used to record findings in compliance reports in accordance with the *EPBC Act Annual Compliance Report Guidelines 2014*.

Rating	Description
Compliant	‘Compliance’ is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions
Non-compliant	A designation of ‘non-compliance’ is given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not applicable	A designation of ‘not applicable ’ is given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.

Table 2-1. EPBC 2020/8818 – Approval conditions and compliance.

Condition #	Condition	Compliance Rating	Evidence/comments
1	The approval holder must not take the Action outside of the Action area.	Not applicable	The action has not commenced.
2	To avoid and mitigate harm to protected matters as a result of taking the Action, the approval holder must comply with the NT Government approval conditions to the extent that they relate to protected matters.	Not applicable	The action has not commenced.
3	By implementing the NT Government Approval conditions, the approval holder must prevent any avoidable harm to protected matters and mitigate unavoidable and accidental harm to protected matters.	Not applicable	The action has not commenced.
4	Any records of interactions between Ghost bats and the Overhead Transmission Line (OHTL), including harm or any noted changes in flight behaviour as a result of the Action, must be included in the monitoring data.	Not applicable	The action has not commenced.
5	The approval holder must submit an Migratory Shore Management Plan (MSMP) to the department for the Minister's approval, to avoid and mitigate harm to EPBC Act listed migratory and EPBC Act listed threatened bird species as a result of works conducted with the Cable Transition Facility outside of the Australian winter.	Not applicable	The action has not commenced.
6	The approval holder must not undertake construction at the Cable Transition Facility outside the Australian winter unless the Minister has approved an MSMP in writing. The approval holder must commence implementation of the MSMP approved by the Minister in writing from the date it is approved by the Minister and continue to implement the approved MSMP until construction at the Cable Transition Facility is completed.	Not applicable	The action has not commenced.

Condition #	Condition	Compliance Rating	Evidence/comments
7	The MSMP must: a) Be prepared in accordance with the Environmental Management Plan Guidelines to the satisfaction of the Minister, and b) Specify adaptive management measures to respond to any emergent issues during construction within the Cable Transition Facility, and c) Detail monitoring efforts and reporting of monitoring outcomes, and d) Include a commitment to report on the implementation of all management measures and monitoring efforts and outcomes with the compliance reports.	Not applicable	The plan is yet to be prepared.
8	The approval holder must not commence construction in the marine environment until a permit under the Environment Protection (Sea Dumping) Act 1981 (Commonwealth) has been granted in relation to this Action.	Not applicable	The action has not commenced
9	The approval holder must initiate a soft start procedure during any initial or subsequent startup activities involving operation of trenching or dredging equipment within Australian Waters.	Not applicable	The action has not commenced.
10	The approval holder must, in accordance with conditions 22-1 and 22-2 of the NT Government approval, prepare a Cultural Heritage Plan (CHP). The approval holder must submit the portion of the CHP relevant to Underwater Cultural Heritage to the department for the Minister's approval. The approval holder must not commence construction in any marine environment unless the Minister has approved the submitted portion of the CHP in writing. The approval holder must commence implementation of the CHP approved by the Minister in writing from the date it is approved by the Minister and continue to implement the approved CHP until the completion of the action.	Not applicable	The action has not commenced.
11	In addition to the requirements specified in condition 22-2 of the NT Government Approval, to the satisfaction of the Minister, the portion of the CHP relevant to Underwater Cultural Heritage must be: a) be prepared in accordance with the Environmental Management Plan	Not applicable	The plan is yet to be prepared.

Condition #	Condition	Compliance Rating	Evidence/comments
	Guidelines, and b) consistent with the department's other relevant Underwater Cultural Heritage guidelines.		
12	Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan required by the NT Government Approval on the website within 15 business days:	Not applicable	The plan is yet to be prepared.
13	of the date the plan is approved in writing if the plan requires approval, or	Not applicable	The plan is yet to be prepared.
14	of the date the plan is submitted to the NT Government or the department (whichever is earliest) if the plan does not require approval.	Not applicable	The plan is yet to be prepared.
15	The approval holder must keep all plans published on the website, in a format that is easily accessible and downloadable, from the first date which that plan must be published and until the expiry date of this approval. This requirement applies to all current and superseded versions of plans.	Not applicable	The plan is yet to be prepared.
16	The approval holder is required to exclude or redact sensitive ecological data from any version of a plan before that plan is published on the website or otherwise provided to a member of the public. If sensitive ecological data is excluded or redacted from a plan, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.	Not applicable	The plan is yet to be prepared.
17	Keep the plan published on the website until the expiry date of this approval.	Not applicable	The plan is yet to be prepared.
18	The approval holder must notify the department in writing of any proposed change to the NT Government Approval that may relate to protected matters within 2 business days of formally proposing such a change and within 5 business days of becoming aware of any proposed change.	Not applicable	No changes proposed to the NT Government Approval.

Condition #	Condition	Compliance Rating	Evidence/comments
19	The approval holder must notify the department in writing of any change to the NT Government Approval that may relate to protected matters, within 5 business days of such a change to conditions coming into effect. Such notification must include a copy of the changed NT Government approval conditions showing what changes have been made.	Not applicable	No changes proposed to the NT Government Approval.
20	The approval holder must notify the department electronically of the date of commencement of the Action, within 5 business days following commencement of the Action.	Not applicable	The action has not commenced.
21	The approval holder must not commence the Action later than 5 years after the date of this approval decision.	Not applicable	The action has not commenced.
22	The approval holder must notify the department electronically of the date of commencement of construction within 5 business days following commencement of construction.	Not applicable	The action has not commenced.
23	The approval holder must notify the department electronically of the date of commencement of construction in any marine environment within 5 business days following commencement of construction in any marine environment.	Not applicable	The action has not commenced.
24	The approval holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records.	Not applicable	The action has not commenced.
25	If the department makes a request in writing, the approval holder must provide electronic copies of compliance records to the department within the timeframe specified in the request.	Not applicable	No requests received.
26	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guidelines for biological survey and mapped data,	Not applicable	No data prepared.

Condition #	Condition	Compliance Rating	Evidence/comments
	Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.		
27	The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	Not applicable	No data prepared.
28	The approval holder must prepare a compliance report for each Annual Compliance Report period (ACR period).	Compliant	This 2025 compliance report has been prepared to satisfy this condition for the 19 August 2024 to 18 August 2025 ACR period.
29	The approval holder must ensure each compliance report includes: c) accurate and complete details of compliance and any non-compliance with: i) each condition attached to this approval decision, and ii) all commitments made in each plan, d) a schedule of all plans in effect in relation to these conditions during the ACR period, e) accurate and complete details of how each plan was implemented during the ACR period, f) if any incident occurred, accurate and complete details of each incident, and g) all survey data relevant to protected matters collected in accordance with condition 3 of the NT Government Approval.	Compliant	This 2025 compliance report provides accurate and complete details of compliance with each approval condition - refer Table 1. This report does not provide details of plans as no plans were submitted or in effect in the reporting period. This report does not provide details of any Incidents as there were none in the reporting period. This report does not provide details of survey data as there were no surveys in the reporting period.
30	The approval holder must ensure each compliance report is completed to the satisfaction of the Minister and is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.	Compliant	This report has been prepared in accordance with the <i>Annual Compliance Report Guidelines, Commonwealth of Australia 2023</i> .

Condition #	Condition	Compliance Rating	Evidence/comments
31	The approval holder must, within 20 business days following the end of each ACR period, in a format that is easily accessible and downloadable, publish on the website: a) each compliance report, and b) a shapefile showing all clearing of protected matters, and their habitat, undertaken within the ACR period.	Compliant	This 2025 Compliance Report will be published on SunCable website https://www.suncable.energy/ A shapefile showing clearing is not provided as no clearing occurred in the reporting period.
32	The approval holder must: a) Exclude or redact sensitive ecological data from each compliance report and shapefile published on the website or otherwise provided to a member of the public. b) If sensitive ecological data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public. c) If sensitive ecological data is excluded or redacted from a version of a shapefile published or otherwise provided to a member of the public, submit the full shapefile to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.	Not applicable	No sensitive ecological data provided in this 2025 compliance report.
33	The approval holder must notify the department electronically, within 5 business days of each date of publication that the compliance report has been published on the website. In this notification, the approval holder must provide the department with the web address for where the compliance report and related shapefile are published on the website.	Compliant	Email notification made.

Condition #	Condition	Compliance Rating	Evidence/comments
34	The approval holder must keep each compliance report and related shapefile published on the website from the first date which that compliance report must be published and until the expiry date of this approval.	Compliant	2025 compliance report published. No prior reports submitted.
35	The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident. The approval holder must specify in each notification: h) any condition or commitment made in a plan which has been, or may have not been, complied with, i) a short description of the incident, and ii) the location (if applicable, including co-ordinates), date and time of the incident.	Compliant	No incidents occurred in the reporting period.
36	The approval holder must provide to the department in writing, within 12 business days of becoming aware of an incident, the details of that incident. The approval holder must specify: a) all corrective measures and investigations which the approval holder has already taken in respect of the incident, i) the potential impacts of the incident, ii) the method and timing of any corrective measures that the approval holder proposes to undertake to address the incident, and iii) any variation of these conditions or revision of a plan that will be required to prevent recurrence of the incident and/or to address its consequences.	Compliant	No incidents occurred in the reporting period.
37	The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period.	Not applicable	The action has not commenced. The audit period is each subsequent 3-year period following commencement of the action.
38	The approval holder must submit details of the proposed independent auditor and their qualifications to the department within 10 business days following the end of each audit period.	Not applicable	No audit this reporting period.

Condition #	Condition	Compliance Rating	Evidence/comments
39	The approval holder must ensure the scope of each independent audit is sufficient to determine the compliance status for each condition of approval, and each commitment made in each plan.	Not applicable	No audit this reporting period.
40	The approval holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019.	Not applicable	No audit this reporting period.
41	The approval holder must submit an audit report to the department for written agreement from the department within 3 months following the end of each audit period, or as otherwise directed by the Minister in writing.	Not applicable	No audit this reporting period.
42	The approval holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019.	Not applicable	No audit this reporting period.
43	The approval holder must publish each audit report on the website, in a format that is easily accessible and downloadable, within 10 business days of the date of the department agreeing to that audit report in writing.	Not applicable	No audit this reporting period.
44	The approval holder must notify the department within 5 business days of the date the audit report is published on the website. In this notification, the approval holder must provide the department with the web address for where the audit report is published on the website.	Not applicable	No audit this reporting period.
45	The approval holder must keep each audit report published on the website from the first date which that audit report must be published and until the expiry date of this approval.	Not applicable	No audit this reporting period and no prior audits.

Condition #	Condition	Compliance Rating	Evidence/comments
46	Within 20 business days after the completion of the Action, and, in any event, at least 20 business days before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data. The approval holder must submit any spatial data that comprises completion data as a shapefile.	Not applicable	The action has not commenced.
47	The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.	Not applicable	The approval expires in 2094.

5 Addressing non-compliance

Zero (0) non-compliances occurred in the reporting period.

6 New Project Risks

Zero (0) new project risks were identified in the reporting period.