



Friends of Grasslands

supporting native grassy ecosystems

PO Box 440, Jamison Centre ACT 2614

phone: 02 6288 2413

email: advocacy@fog.org.au

web: <http://www.fog.org.au>

Department of Planning and Environment
NSW Government

Dear Sir/Madam

Snowy 2.0 – main works

Friends of Grasslands (FOG) is a community group dedicated to the conservation of natural temperate grassy ecosystems in south-eastern Australia. FOG advocates, educates and advises on matters to do with the conservation of grassy ecosystems, and carries out surveys and other on-ground work. FOG is based in Canberra, with many members in surrounding New South Wales. Its members include professional scientists, landowners, land managers and interested members of the public.

FOG has a particular interest in the Alpine Sphagnum Bogs and Associated Fens ecological community as well as the grassy ecosystems in the project area – Grey Box Grassy Woodlands, Natural Temperate Grasslands and Box- Gum Grassy Woodlands. We are aware of significant threats already impacting upon these communities, such as weed invasion, wild horses and feral animals. Any additional impacts from Snowy 2.0 will further erode the capacity of these communities to survive in the long term.

In principle FOG believes that no developments should impact upon endangered and critically endangered species and ecological communities. As indicated in our submission to EPBC referral 2018/8322, in the case of Snowy 2.0, FOG acknowledges that it has been declared Critical State Significant Infrastructure by the New South Wales government. However, its situation within Kosciusko National Park means that it is inevitable that such a massive engineering project will have localised, negative environmental impacts that would not normally be permitted in this environmentally sensitive area.

Piecemeal approach

Another concern is that the current referral outlines the expected impacts of the main works of the Snowy 2.0 project, but does not include the transmission lines. We understand that at least an additional two EISs are expected: one for the concrete tunnel linings for the main works and another to accompany the application for the proposed underground power station. As well, there has been a recent EPBC referral concerning the segment factory in Cooma (referral no 2019/8481). Our experience is that a piecemeal approach like this understates the total impact of a project on threatened grassy ecosystems and threatened grassland species. We strongly urge that a strategic assessment be undertaken for this project rather than several disconnected EISs and EPBC referrals at different points in time as is occurring at present.

Offset strategy

Our view is that any project impacting on an endangered species or ecological community should not be approved. In the case of Snowy 2.0, we note that measures have been undertaken to minimise the negative impacts of the project on threatened grassy ecosystems, and also the threatened species that occur within them (e.g. *Rutidosia leiolepis*, *Calotis glandulosa* and *Prasophyllum innubum*). However, impacts are unavoidable with this project and, if it proceeds, need to be offset.

Advanced offsets

In our submission to EPBC referral 2018/8322, we presented our view that offsets must be like-for-like and should be in place before any construction work begins. In reviewing the offsets strategy, the timeframe for its implementation is not provided. With a major project such as this, it should be possible to provide at least some advanced offsets, i.e. commence delivery of some of the offsets prior to the full construction phase and definitely prior to completion of the project. Our observation on other projects is that, while significant construction works can be undertaken quickly, agreement on and delivery of the offsets strategy often lags well behind construction. As a result, it isn't known until years downstream from construction completion as to whether or not the offset was successful in preventing no net loss of threatened species and communities – the aim of the offset. In fact, in most cases we still have no evidence that the offsets were completely effective. In some cases, gains have clearly been made, but FOG lacks evidence that shows that there was no net loss in the affected threatened species or ecological community across the landscape. In others our suspicion is that there has been a net loss despite the offset, but there is insufficient data available to a group such as FOG to state this definitively.

In the case of the Snowy 2.0 project, our view is that the offset strategy for grassland and sphagnum moss threatened communities, and species occurring within these communities, should be agreed and implementation commenced by the time construction work for the project starts. There needs to be early review of the offset actions to ensure that they will, in fact, lead to biodiversity gains. There also needs to be made explicit in the offset strategy any further steps that will be undertaken if the offsets proposed initially do not lead to biodiversity gain on the ground.

Content of offsets strategy

In contrast to the rest of the documentation, the offset strategy is brief and offers little detail – something that fills us with considerable doubt about the eventual effectiveness of the offset strategy. The offset strategy should be fully developed and details provided for public comment before the project proceeds any further. Some matters that FOG believes should be included in the offsets strategy follow.

Given the impact on a national heritage area and the number of threatened species and ecological communities, the offsets required should be much more the NSW planning offset formula minimum proposed by Snowy Hydro, for the following reasons:

1. There is insufficient evidence available to be sure that rehabilitation efforts will be as effective as hoped. We are still learning how to rehabilitate grassy ecosystems, and there are examples of other projects where rehabilitation efforts have fallen short. With the increasing extremes due to climate change, e.g. droughts, the chances of effective rehabilitation occurring are even less.
2. Restoration of Snowy 1.0 sites is incomplete, and should be included as an extra offset as well.
3. Some impacts, e.g. the impact on ground water that might affect the Alpine Sphagnum Bogs and Associated Fens ecological community, are not known in full and may not be known until some time after the project is operational. Using the precautionary principle, offsets for these impacts should be overstated to ensure that, in fact, no net loss results.

Trust fund

The NSW Government needs to establish a trust fund to manage the offset monies in perpetuity. Snowy Hydro should make compulsory annual additional contributions to this fund to cover ongoing impacts, monitoring of the project impacts, and further offsets if the original offsets are not completely effective. This fund should be used for monitoring of species, habitats and ecosystems, for long-term restoration management, and for additional management needed in rehabilitation and offset areas as a result of climate change.

Conclusion

FOG is of the view that no development that has an impact on threatened grassland species and ecological communities should proceed. If Snowy 2.0 does proceed, we urge that it not do so until (a) a strategic assessment of the environmental impacts of the whole project is undertaken, rather than the current piecemeal approach, and (b) the offsets strategy is both determined in some detail and expanded in its value to ensure that, in the long term, there is no net loss of our grassy ecosystems and species.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Geoff Robertson', written over a horizontal line.

Geoff Robertson
President

21 October 2019