



STEP Inc

Community-based Environmental Conservation since 1978

5 November 2019

Department of Planning, Industry and Environment
Major Projects Team
Attention: Anthony Ko

Dear Sir

Submission on Snowy 2.0 Main Works Environmental Impact Statement

STEP Inc is a community-based environmental group, with a membership of over 400 in the northern Sydney. Our main objective is to preserve natural bushland in northern Sydney from alienation or degradation and ensuring proper management of this bushland including ensuring its role as habitat for animal species. Our group has considerable experience in environmental issues and the geology and soils in New South Wales.

Our concern about the future of Sydney's bushland naturally extends to interest in the conservation of national parks. The damage that will be done to the sensitive alpine environment of Kosciuszko National Park by the Snowy 2.0 project, as revealed by the Environmental Impact Statement (EIS), is unacceptable. Not only that, the information available so far does not demonstrate any clear benefit to the people of eastern Australia from the financial point of view, nor in providing more certainty in the continuity of electricity supply, the objective of the project.

STEP calls on the NSW government to refuse to proceed with this project until the benefits of the project can be clearly demonstrated by independent analysis. This analysis also must include the parts of the project that have not been included in the EIS process, such as the transmission infrastructure. Alternative options must also be properly considered.

The information available so far clearly shows that it will be irresponsible for the project to proceed because of the costs and risks that will be imposed on the taxpayers of NSW. Not only is the project fiscally irresponsible, it does not meet the standards of Ecologically Sustainable Development under the Environmental Planning and Assessment Act.

Some specific reasons for STEP's assessment of the project are outlined below.

Environmental impacts

The damage to the delicate alpine and sub-alpine environment of Kosciuszko NP includes:

- As acknowledged by the EIS the construction footprint will 'disturb' 1,680 hectares, clear 1,053 hectares of native vegetation, and destroy 992 ha of threatened species habitat (threatened fauna, threatened flora and Threatened Ecological Communities).
- Clearing of a 10km long, 120m wide easement for transmission lines that will have to remain cleared to control fire risk.
- Clearing of 400 ha along the Yarrangobilly River for a construction camp and rock dump
- Dumping of 14 million cubic metres of excavated rock some of which contains naturally occurring asbestos and/or is acidic. 8 million cubic metres of this is to be dumped into the Talbingo and Tantangara Reservoirs, the very reservoirs that are an essential part of the pumped hydro scheme.
- Pest fish species will be transported from Talbingo to Tantangara Reservoir and into downstream rivers

- Watertable drawdown will have a catastrophic impact on the environment along sections of the 27 km tunnel, will dry up existing creeks, impact the local fish and animals and reduce inflows to the reservoirs and hence water releases.

The impacts of a proposal of this scale and intensity will be irreversible and cannot possibly be 'mitigated', offset or otherwise approved under the Environmental Planning and Assessment Act framework. Offsets cannot be found for the habitats that would be destroyed by Snowy 2.0 given that all of the comparable alpine and subalpine areas of NSW are already included in Kosciuszko NP.

Such a proposal is unacceptable and simply should not be contemplated in an internationally renowned conservation reserve in the first place.

Minimal contribution to renewable energy

The data provided in the EIS seriously undermines the claimed benefits of the project. Specifically Snowy 2.0 will be a net consumer of electricity, not a generator, with 'round-trip' losses of 30%, plus another 10% for transmission. If Snowy 2.0 ever generated its claimed 350 GWh of energy, it would take 500 GWh of pumping energy to re-charge, incurring 150 GWh of losses. Better ways of stabilising the electricity supply should be explored. Will the use of some smaller scale projects will be more flexible and cost effective?

As demonstrated by Bruce Mountain from the Victoria Energy Policy Centre the actual workings of the cyclical pumped hydro system Snowy 2.0 adds just 170 GWh of recyclable pumped hydro. This is less than half the claimed storage capacity.¹

The project is probably uneconomic

It is clear that the cost of Snowy 2.0 will be many times greater than the original \$2 billion estimate, later updated to \$3.8 billion. A single contract for \$5.1 billion has recently been awarded that does not include transmission infrastructure. The ultimate cost could be as much as \$10 billion. The Commonwealth has already committed \$1.38 billion as a subsidy for the project. It is not at clear that the project will be economically feasible.

Snowy Hydro is wholly owned by the Commonwealth Government, hence the Australian community. The ultimate bearers of the risk of Snowy 2.0 are the Australian community.

The planning and approval process is flawed

The Main Works EIS is only part of the assessment of the broader Snowy 2.0 Project. It is over 2½ years since Snowy 2.0 was announced (March 2017). Over the intervening period the Snowy Hydro Board has authorised the Final Investment Decision, the Government has approved the project and kicked in \$1.38 billion, a \$5.1 billion contract has been awarded, construction commenced 8 months ago (February 2019) and major equipment is being ordered. Yet, the Main Works EIS has only just been released and the EIS for the high voltage transmission lines is yet to come.

The effect of this incremental piece-meal planning and assessment process has been to deny the community a holistic view of the full scope and impacts of Snowy 2.0. This approach compromises transparency from both a proposal and assessment perspective.


Despite the Environmental Planning and Assessment Regulation 2000 requiring "*an analysis of any feasible alternatives to the carrying out of the development, activity or infrastructure*", no such analysis has been provided. The project must be put on hold until such fundamental information is provided, especially as many alternatives have been identified with far less environmental impacts and better economics, both within and outside KNP.

¹ <https://theconversation.com/snowy-2-0-will-not-produce-nearly-as-much-electricity-as-claimed-we-must-hit-the-pause-button-125017>

Conclusion

The Snowy 2.0 project, as described in the Main Works EIS, does not meet the principles of Ecologically Sustainable Development as mandated in the Environmental Planning and Assessment Act. In short, the staggering scale and severity of environmental impacts are by no means commensurate with the environmental, economic and community benefits of the project.

Yours sincerely,

A handwritten signature in black ink that reads "Jill Green". The signature is written in a cursive, flowing style.

Jill Green
President