

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

4 November 2019

Submission on Snowy 2.0 Main Works Environmental Impact Statement

I want to register my opposition to the way in which Snowy 2.0 is being rushed into a point-of-no-return, without due consideration of the environmental and economic consequences of the scheme.

The impacts, outlined in the Main Works Environmental Impact Statement (EIA), are unacceptable especially in Kosciuszko National Park (KNP) that is already subject to extensive environmental damage from feral animals, with horses totally out of control and deer and pigs not being sufficiently controlled, so say nothing of the impact of weeds species and the impact of climate change. Snowy2.0 does not exist in a vacuum as presumed in the current plans, but exacerbates the profound challenges already facing the fragile KNP.

The assessment process has been broken up into stages, so that should a later stage prove extortionately damaging or expensive, it is nigh impossible not to proceed. The project has not been considered, openly and in detail, as a whole.

The 100 or so pages of this EIS is beyond the scope of ordinary people to digest in its entirety. A lack of submissions in response to the EIS, is likely a response to the difficulty in bringing it down to a manageable task. The need to 'register' seems also designed to thwart people from making submissions.

Some key points though are sufficient to justify a long pause to the project, beyond the next federal election at least, so the problems already apparent, and alternatives to one large hydro battery storage affecting the sub-alpine section of KNP, can be openly investigated.

It is misleading to claim that Snowy 2.0 will only impact 0.25% of KNP. It will significantly impact a much larger proportion of the fragile sub-alpine section, home to many rare species and likely to be sought as a refuge for more species as climate change continues. There is no suitable 'offset' for the areas already being impacted by Snowy 2.0. What is affected is affected without remedy.

The size of this EIS makes it impossible for most people to make a comprehensive response to all the concerns associated with Snowy 2.0, but some of mine are outlined below.

Environmental impacts

While the EIS states that Snowy 2.0 will only have a footprint of 0.25% of KNP, the project area of the EIS shows it as one third of KNP. Not all KNP is equal. The sub-alpine section is much less, and this is the area that will be disproportionately destroyed or compromised by Snowy 2.0.

The roads and transmission lines easements will radically impact the sub-alpine area. Already work camps and new roads are cited by supporters of no-management of feral horses in KNP, as justification for allowing the continued damaging impact of the horses. AS they say, why pick on feral horses if Snowy 2.0 can destroy nearly 1000 ha of threatened species habitat? Government

funded at that. The cumulative effect of assaults on the environmental values of KNP are compounding and severe.

The amount of spoil from tunnelling is massive, much more so than initial Snowy 2.0 briefings just over two years ago suggested. The fact that some will be contaminated with asbestos, and some quite acidic is an environmental problem alone. The proposals to dispose of the majority of it into existing dams is reprehensible. In-filling dams when this country needs all the water storage it can get is irresponsible.

Water table impacts from the tunnelling is a massive concern. Lower water tables will change the vegetation and water-holding capacity of the soil, lessening the important holding function that KNP exerts on water release. This damage will be irreversible. Key habitats lost can't be replaced. The impacts of a water table lowered by 50 metres above some areas of the tunnel, and up to half a metre even 3 kms beyond the tunnel, is not 'acceptable' to any responsible land manager with a say on how their land was affected by a third party.

The movement of pest species, such as the redfin perch, between Talbingo Dam into Tantangara is acknowledged as inevitable, and treated as a non-issue even though it is a Class One Noxious Pest, and it is illegal to transfer it between waterways. Is Snowy 2.0 above the law? Contamination from this species alone will affect recreational fishing and populations of threatened native fish all along Lake Eucumbene, the Murrumbidgee, Snowy and Murray Rivers. The 'we'll do our best', knowing it isn't sufficient, is not acceptable. The redfin issue isn't the only contaminant that the movement of water between the two dams will enable.

The attempt to justify the man-made intrusions into KNP by Snowy 2.0: roads, construction camps, power lines, as a salute to engineering prowess is clutching at straws to justify the unjustifiable. People do not go to KNP to see ugly scars cutting through a pristine landscape. Powerlines and roads detract from the core values of KNP. If I want to see industrialisation, I go to Port Kembla or Portland, not KNP. If I go to KNP, I want nature, untarnished.

Some politicians may want to boast of their roles in large grandiose projects, but Australia is a fragile land, our water resources very finite, and Snowy 2.0 will be a blot on our very limited high country.

The mounting number of environmentally unacceptable consequences from Snowy 2.0 indicate it a wrong project to construct in KNP.

Justifying Snowy 2.0

Snowy 2.0's justification is that it will help stabilise the national energy market as renewable energy dominates the grid. It would use at least 30% of generated electricity in pumping water back up to Tantangara during 'peak' renewable energy generation and will inevitably increase the cost of renewable energy to users.

The system is not necessary for the next decade, and should an event occur where the full capacity of using Tantangara water to produce backup electricity during what are normally renewable energy generation times, it would take a very long time to refill Tantangara. The constant change in water levels between the dams will create damp edges, particularly prone to damage from feral animals, but no program to manage them is proposed.

Cost blowout

The cost of Snowy 2.0 was stated as \$2 billion when it was first announced, and that there would be profits and no government funding would be required. Instead, before submissions on the major works EIS have closed, the Commonwealth has provided a \$1.38 billion subsidy to the project, and a contract has been awarded for \$5.1 billion. All this before the Main Works EIS has been fully considered, and before an EIS for high voltage transmission lines has been completed. If the past is anything to go in, that EIS will reveal even more unacceptable environmental damage, and cost increases.

Current indications are that the project will cost at least \$10 billion. The economics of a project costing \$2 billion compared to the economics of an identical project costing five times as much, need to be urgently reassessed.

Snowy 2.0 has not been assessed as a whole. The potential to obtain the 'deliverables', ie, energy storage for low renewable transmission times, has not been examined and publicly compared against other electricity storage systems, hydro or other battery.

A five-fold increase in estimated cost alone, in just over 2 years, suggests that the whole rationale for Snowy 2.0 as against alternative electricity storage systems needs to be revisited. Until that can be done, Snowy 2.0 should be put on hold.

Conclusion

The proponents of Snowy 2.0 must halt the project whilst it is reassessed. To be allowed, it must meet the principles of Ecologically Sustainable Development, set out in the Environmental Planning and Assessment Act 1979.

As it currently stands, Snowy 2.0 ignores potentially catastrophic environmental consequences by inserting words such as 'acceptable' when an environmental problem is noted. The economic benefit has not been proven when compared with other electricity storage solutions.

Yours sincerely,