

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

5<sup>th</sup> November 2019

### **Submission on Snowy 2.0 Main Works Environmental Impact Statement**

I, John Chapman wish to indicate my strong opposition to the Snowy 2.0 project as described in the Main Works Environmental Impact Statement (EIS). I have worked in and frequently visited Kosciuszko National Park (KNP) and I consider that the scale and intensity of environmental impact described in the EIS is inappropriate in such a sensitive sub alpine region. KNP is one of our nation's most iconic, National Heritage Listed national parks.

I am also a strong supporter of renewable energy and recognise the potential for pumped hydro in maintaining the electricity supply but in the EIS there is a distinct lack of credible consideration of less expensive, lower impact alternatives. The excessive cost will be paid for by the Australian public, the ultimate owners of the Snowy Hydro scheme.

These failures clearly demonstrate that the **Snowy 2.0 project does not meet the standards required of Environmentally Sustainable Development** and accordingly the project should be refused by the Minister for Planning.

The project is of vast scale and the quantity of documentation makes it very difficult to address all my/our concerns about the project. Issues of particular concern are described below:

#### *Environmental impacts*

The EIS repeatedly asserts that the Snowy 2.0 project will have a minor impact on KNP on the basis that the development footprint represents approximately 0.25% of the total area of the park. I consider this assessment to be incorrect for the following reasons:

- The "Project Area", as depicted in the EIS, covers approximately 50 km by 50 km (250,000 hectares), which is a third of KNP - an area twice the size of Greater Sydney.
- While KNP is one of the largest National Parks in NSW (690,000 hectares), the portion containing sub-alpine habitats, the areas to be destroyed by Snowy 2.0, is much smaller, and has some of the rarest habitat in Australia, which will prove increasingly important for the retreat of alpine species affected by the increased heat with climate change. These rare habitats should be appropriately considered for assessing the adverse environmental impacts of Snowy 2.0, not the lower altitude landscapes that characterise the majority of KNP.
- This construction will be largest ever proposed loss of critically important habitats in a NSW National Park. The EIS acknowledges that 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). The construction footprint acknowledged in the EIS substantially understates the full extent of permanent damage outside the heavy construction zones, including Talbingo and Tantangara Reservoirs, 100 kms of new and upgraded roads, 10 kms of

transmission lines with a 120 metre-wide easement swathe, ground water depleted areas above the tunnels, construction camps (for 2,100 workers) and multiple works areas. When all these areas are taken into account, Snowy 2.0 will permanently damage more than 10,000 ha of KNP (100 square kms), rather than the claimed 1,680 ha.

- No development of this scale or intensity is appropriate in the sensitive habitats of a declared conservation reserve. The issue should not be whether the impacts of a proposal of this scale and intensity can be 'mitigated', offset (where else do we offset alpine environments?) or otherwise approved under the Environmental Planning and Assessment Act framework. On the contrary, such a proposal simply should not be contemplated in an internationally renowned conservation reserve in the first place.

The project requires tunnelling through 27 kms of rock, large scale quarrying, road building and widening and the establishment of large accommodation and construction sites. The EIS does not provide a credible account of how 14 million cubic metres of spoil (enough to cover a football field to a height of 3 km), some of which is heavily contaminated, can be disposed in KNP without further significant environmental impacts. It is clear that much of the excavated materials will be used in 'landscaping' works that will further exacerbate the damage to the Park. Unbelievably, over 8 million cubic metres is to be dumped in the active storage areas of Talbingo and Tantangara Reservoirs, depleting their capacities. How could approval be given for anyone to dump waste material, some of which is contaminated, in a National Park?

The EIS describes extensive impacts on water dependant habitats and species through disruption to ground water systems by the tunnelling as well as in works beside 8 kms of the Yarrangobilly River.

Watertable drawdown is predicted to be in excess of 50 m above the tunnel in areas of high hydraulic conductivity (Gooandra Volcanics). The drawdown at 3 km either side of the tunnel is still 0.5 m in the western plateau. This 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.

It is remarkable that Snowy Hydro would show such disregard for the protection of water dependant ecosystems not just in alpine areas but at the headwaters of our major waterways. I/we do not accept the assertion that such impacts are 'acceptable'. Experience demonstrates that once ground water systems are disrupted by mining activities the damage is irreversible and can become even more extensive over time.

Snowy 2.0 will disperse pest species and viruses throughout the waterways of KNP and downstream. Snowy Hydro acknowledges that it is inevitable that these noxious species will be transferred from Talbingo to Tantangara. Establishment of the dominant Redfin Perch will be to the detriment of both recreational anglers and significant populations of threatened native fish.

One of KNP's core values is the sense of wilderness and solitude unique to alpine landscapes. These aesthetic qualities, and the experience of visitors, will be seriously diminished by the increases in roads, permanent large structures and especially the transmission lines. The project will not only impact directly on the areas trashed by the project - the overall sense and experience of the Park landscape will be damaged forever. The implication in the EIS that the community will regard the proposed infrastructure as evidence of the nation's engineering prowess offers hollow recompense for the loss of the Park's unique aesthetic qualities.

*Uneconomic*

It is clear that the cost of Snowy 2.0 will be many times greater than the original \$2 billion and then \$3.8 billion estimates – a single contract for \$5.1 billion has recently been awarded. It is likely that the project, including transmission, will be \$10 billion, or even more. At anything approaching this amount the project is totally uneconomic.

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.

In addition to its shareholding the Commonwealth increased the commitment of public funds through a \$1.38 billion subsidy into the project. Why was this necessary and why is the Commonwealth Government playing favourites in the National Electricity Market?

### *Flawed planning and approval process*

The Main Works EIS is only part of the assessment of the broader Snowy 2.0 Project.

The incremental piece-meal planning and assessment process has an effect of denying 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. Given the scale of the project this approach can only be seen as designed to obscure the full extent of environmental impact on KNP.

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.

The EIS makes multiple references to mitigating the impacts of Snowy 2.0 through promising future plans and works in consultation with NPWS or through formal offsetting processes. No appropriate offsets for the habitats that would be destroyed by Snowy 2.0 could be provided, given that all of the comparable alpine and subalpine areas of NSW are already included in KNP.

### **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,

John Chapman