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

Tuesday 5 November 2019

Re: Submission on Snowy 2.0 Main Works Environmental Impact Statement

Dear Mr Ko,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to comment on the Environmental Impact Statement for the Snowy 2.0 Main Works. Since 1962, the NCSSA has been a strong advocate for the protection of native vegetation and biodiversity with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and management of protected areas.

Whilst our work is primarily focused in South Australia, we believe a project of this scale deserves our attention.

We would like to take this opportunity to indicate our strong opposition to the Snowy 2.0 project as described in the Main Works Environmental Impact Statement (EIS). Our objections are based on:

- **The impact on Kosciuszko National Park**

We believe that the Kosciuszko National Park (KNP), one of our nation's most iconic, National Heritage Listed national parks, should be protected and not damaged as per this proposal. No development of this scale or intensity is appropriate in the sensitive habitats of a declared conservation reserve.

Particularly, we believe the construction footprint acknowledged in the EIS substantially understates the full extent of permanent damage outside the heavy construction zones, and that when all areas that will be damaged are taken into account (including new and upgraded roads, construction camps and works areas), Snowy 2.0 will permanently damage more than 10,000 ha of KNP (100 square kms), rather than the claimed 1,680 ha.

In our view, the issue should not be whether the impacts of a proposal of this scale and intensity can be 'mitigated', offset or otherwise approved under the Environmental Planning and Assessment Act framework. On the contrary, we believe such a proposal simply should not be contemplated in an internationally renowned conservation reserve in the first place.

- **The lack of consideration of less expensive, lower impact alternatives**

Snowy Hydro claims that Snowy 2.0 will play a pivotal role in stabilising the national energy market as new renewable generation is added to the grid. We don't accept that such claims justify the extent and severity of environmental destruction that the project will cause to KNP, especially in the absence of a credible assessment of alternative ways of providing this service.

Specifically, the Environmental Planning and Assessment Regulation 2000 requiring "*an analysis of any feasible alternatives to the carrying out of the development, activity or infrastructure*", however, no such

analysis has been provided. The project must be put on hold until such fundamental information is provided. We understand that alternatives have been identified with far less environmental impacts and better economics, both within and outside KNP.

In South Australia, the current leading cause of native vegetation clearance approval is for solar farms. As with Snowy 2.0, this situation represents a failure to adequately plan for our transition to renewable energies, which we firmly believe can be achieved without further loss of our wild places and native wildlife.

If you would like to clarify or discuss this submission please contact me on (08) 7127 4633 or via email at julia.peacock@ncssa.asn.au.

Yours sincerely,

A handwritten signature in blue ink that reads "Julia Peacock". The signature is written in a cursive style and is set against a light yellow rectangular background.

Julia Peacock
Nature Advocate