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

5/11/19

## Submission on Snowy 2.0 Main Works Environmental Impact Statement

I, Ralph Cartwright, wish to indicate my strong opposition to the Snowy 2.0 project as described in the Main Works Environmental Impact Statement (EIS).

Although a federal project, it requires NSW approval, which I believe should NOT be given for the following main reasons:

The scale and intensity of environmental impact described in the EIS is inappropriate in any sensitive region, let alone one of our nation's most iconic, National Heritage Listed national parks.

Claims about energy storage potential are dubious and the excessive costs will be paid for by the taxpayer.

## Environmental impacts

The EIS repeatedly asserts that the Snowy 2.0 project will have a minor impact on the basis that the development footprint represents approximately 0.25% of the total area of the park. I consider this assessment to be utterly 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 33% of the park, not 0.25%.
- However, the portion containing sub-alpine habitats, the areas to be destroyed by Snowy 2.0, contains some of the rarest habitat in Australia and is already under threat from feral animals, deer and horses plus changes due to global warming.
- This construction will deplete ground water in areas above the tunnels, which will further impact rare flora and bog habitats.
- If one includes construction camps (for 2,100 workers) and multiple works areas, Snowy 2.0 will permanently damage more than 10,000 ha rather than the claimed 1,680 ha.
- The excavated materials will be used in 'landscaping' works that will further exacerbate the damage to the Park. Over 8 million cubic metres is to be dumped in the active storage areas of Talbingo and Tantangara Reservoirs, further depleting their capacities and undermining the feasibility of the scheme even further.
- The threat from dispersal of pest species (including redfin perch, eastern gambusia, wild goldfish, Epizootic Haematopoietic Necrosis Virus (EHNV) and elodea weed) throughout the waterways of KNP and downstream is not adequately covered in the submission and should be reason enough to refuse consent.
- The data provided in the EIS seriously undermines the claimed benefits of the project in that Snowy 2.0 will be a net consumer of electricity.
- For the next decade or so most pumping electricity will come from coal-fired power stations, not renewables, belying the claim that Snowy 2.0 will 'store' electricity from renewable generators.
- 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.