

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

5/11/2019

Submission on Snowy 2.0 Main Works Environmental Impact Statement

I wish to indicate our strong opposition to the Snowy 2.0 project as described in the Main Works Environmental Impact Statement (EIS). The scale and intensity of environmental impact described in the EIS is inappropriate in any sensitive sub alpine region, let alone Kosciuszko National Park (KNP), one of our nation's most iconic, National Heritage Listed national parks.

In addition to the unacceptable environmental impacts on KNP there is a distinct lack of credible consideration of less expensive, lower impact alternatives. Claims about energy storage potential are dubious and the cost – to be born the Australian public – is excessive.

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 vast scale of the project and the quantity of documentation make it very difficult to address specific concerns about the project. Issues of particular concern are:

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. However I consider this assessment to be a vast underestimation and unacceptable, for the following reasons:

- 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. This sub-alpine area has some of the rarest habitat in Australia, and will prove increasingly important for the retreat of alpine species affected by the heating climate. These rare habitats provide the appropriate context 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 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.
- 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.
- 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.

Minimal contribution to renewable energy

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. I don't not 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. In any case, 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.
- 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.

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 or the substantial, sensitive and at risk natural values of the study area.

Yours sincerely,

Claire Coulson