

Sample Submission for Snowy 2.0 Main Works EIS

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

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Submission on Snowy 2.0 Main Works Environmental Impact Statement

I, Jennifer Gill, wish to indicate my strongest opposition to the Snowy 2.0 project as described in the Main Works Environmental Impact Statement (EIS). The scale and intensity of the environmental impacts described in the EIS be immensely deleterious to the sensitive sub alpine regions which the Heritage listed Kosciuszko National Park (KNP) was established to protect. The scope and nature of the works described cannot fail to trash much of what Australians treasure b

The fractured environmental assessment process seems designed to conceal the catastrophic extent of environmental impacts. I find it outrageous that it is only now after works have commenced and billions of dollars have been committed that the extent of the damage that would be caused by this project both at the site and surrounding areas but also in terms of transmission lines and impacts on water and river system begins to be revealed to the public.

There is no credible consideration in the EIS of less expensive, lower impact alternatives to the proposed Snowy Hydro 2.0 scheme which could operate more locally to renewal energy projects and act more nimbly as 'batteries' when electricity is required.

Claims about energy storage potential are dubious and 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.

Some specific objections are detailed below:

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. 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), not the 1,680 ha claimed in the EIS.

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.

The project requires tunnelling through 27 ks 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, some of which is heavily contaminated by asbestos and acidic compounds, can be disposed in KNP without further significant environmental impacts. Should the excavated materials be used in 'landscaping' works as proposed this 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, let alone 14,000,000 m³.

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 km 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 do not accept the assertion that such impacts are 'acceptable'. Once ground water systems are disrupted by mining activities the damage is irreversible and can become even more extensive over time. In our dry country we ignore the negative impacts on our precious life-giving waterways of projects such as this to our peril.

It is enormously concerning that the EIS acknowledges that noxious pest species (including redfin perch, eastern gambusia, wild goldfish, Epizootic Haematopoietic Necrosis Virus (EHNV) and elodea weed) will be dispersed throughout the waterways of KNP and downstream as a consequence of the proposed works. Redfin is a Class One Noxious Pest - it is illegal to transfer Redfin between waterways in NSW. 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. I am outraged that such contamination is even being contemplated. That these noxious species are likely to be transfer downstream to the Murrumbidgee River and Lake Eucumbene and thence throughout the rest of the Snowy Scheme and downstream rivers (Snowy, Murrumbidgee and Murray) is unconscionable.

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.

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.

Flawed planning and approval process

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

It is over 2½ years since Snowy 2.0 was announced (March 2017). Over the intervening period the Snowy Hydro Board has authorised the Final Investment Decision, the Government has approved the project and kicked in \$1.38 billion, a \$5.1 billion contract has been awarded, construction commenced 8 months ago (February 2019) and major equipment is being ordered. Yet, the Main Works EIS has only just been released and the EIS for the high voltage transmission lines is yet to come.

This incremental piece-meal planning and assessment process has denied the community a holistic view of the full scope and impacts of Snowy 2.0. Given the scale of the project this approach can only be seen as designed to obscure from the public the full extent of the proposed 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 can 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. The proposed works will cause extensive adverse environmental impacts over a huge area of Australia’ alpine high country, causing irrevocable loss of its character, natural heritage and conservation values, degrading and diminishing Kosciusko National Park.

I urge you to think again. We should not be asked to sacrifice one of Australia’s treasured National Parks to keep the lights on.

Yours sincerely,

Jennifer Gill