

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

6 November 2019

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

We, Judy and Dave Kelly, are strongly opposed to the Snowy 2.0 project as described in the Main Works Environmental Impact Statement (EIS). Kosciuszko National Park (KNP) being alpine and subalpine in nature is a very sensitive environment already subject to substantial pressures. The pressures include extended droughts, resulting from climate change, tourism and recreation, including horse riding in sensitive alpine areas, and feral animal and plant infestations that an under resourced Parks and Wildlife Service cannot adequately control.

The extent and severity of environmental impact described in the EIS should not occur in any sensitive sub alpine region, let alone an Australian National Heritage Listed national park.

KNP is the source of several of eastern Australia's main rivers: the Snowy, Murray, and Murrumbidgee which provide water to inland towns, cities and agricultural areas including the Murray – Darling River. The river systems are already under severe stress and many rural communities are running out of water. Because KNP is a vital source of water, it should be granted the highest level of protection.

Another reason for granting KNP the highest level of protection is that it contains many threatened and vulnerable plants, animal, and insect species that have nowhere to go if they cannot survive increasing summer temperatures.

Additional storage capacity is needed in south east Australia but Snowy Hydro should not be built in KNP where the impact will be substantial.

Consideration of less expensive, lower impact alternatives is lacking. We do not trust claims about energy storage potential and we the Australian public will have to pay for blow out costs. Ultimately the Australian public own the Snowy Hydro scheme.

*We feel that because Snowy 2.0 project does not meet the standards for Environmentally Sustainable Development the Minister for Planning should refuse the project.*

Because the project is on such a large scale with such substantial documentation it is very difficult to address all our concerns about the project. Issues of particular concern:

## Environmental impacts

The EIS assertion that the Snowy 2.0 project will have a minor impact on KNP because the development footprint represents approximately 0.25% of the total area of the park is unacceptable because:

- The 250,000 hectares “Project Area”, as depicted in the EIS, is a third of KNP, twice the size of Greater Sydney.
- Areas of sub-alpine habitats in Australia are restricted and rare. Snowy 2.0 will have a disproportionate and destructive impact on the small sub-alpine area of KNP which with climate change, will be vital as a refuge for retreating alpine species. 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.
- 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). *This is unacceptable*. 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.

The project’s scale and intensity are inappropriate in the sensitive habitats of a declared conservation reserve. Impacts of the proposal cannot be ‘mitigated’, offset or approved under the Environmental Planning and Assessment Act framework. It is unacceptable especially when **The Biodiversity Impact Assessment Report, p 459 states:**

**“Potential direct impacts that could arise from Main Works, prior to any measures to avoid, minimise or mitigate impacts, include:**

- clearing of large areas of significant native vegetation
- clearing of high-quality threatened species habitat;
- clearing of threatened ecological communities (TECs); and
- disturbance of river/creek beds and banks.

**In addition to the direct impacts arising from this process, clearing of native vegetation has several indirect impacts.”**

**Part C, EPBC Act Assessment, pp 513 – 532 is cursory and inadequate. Endangered species, including the Broad-toothed rat, the Spotted-tailed Quoll, and the Alpine Tree Frog are listed on p524 but under the Conclusion the statement “These assessments concluded that a significant impact was likely to result to the Smoky Mouse. Impacts to all other species and the community were not considered significant in the context of the findings of Snowy 2.0” (p 525)**

## **We think this is simply unbelievable and unacceptable.**

Our other concerns relate to:

- **The extensive tunnelling** through 27 kms of rock, large scale quarrying, road building and widening and the establishment of large accommodation and construction sites. How will 14 million cubic metres of spoil, some of it heavily contaminated by asbestos and acidic compounds, be disposed of in KNP without further significant environmental impacts? How could approval be given to dump waste material, some of it contaminated, in a National Park, let alone 14,000,000 m<sup>3</sup> - enough to cover a football field to a height of 3 km?
- **The 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 plus water drawdown which will dry up existing creeks, affect local fish and animals and reduce inflows to the reservoirs when Australia is facing unprecedented water shortages.
- **Snowy 2.0 will disperse pest species** (including redfin perch, eastern gambusia, wild goldfish, Epizootic Haematopoietic Necrosis Virus (EHNV) and elodea weed) throughout the waterways of KNP and downstream. 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.
- **Snowy Hydro's unacceptable visual impact with more roads and transmission lines.**
- **Minimal contribution to renewable energy**

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.

- **Uneconomic**  
The cost of Snowy 2.0 will be 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.

As former taxpayers and members of the Australian community who own Snowy via the Commonwealth Government, hence the Australian community we strongly object to the spending of public money on Snowy Hydro 2.

- **Flawed planning and approval process**

Although it is over 2½ years since Snowy 2.0 was announced (March 2017), the Main Works EIS has only just been released and the EIS for the high voltage transmission lines is yet to come.

Such piece-meal planning and assessment prevents us from having a holistic view of the full scope and impacts of Snowy 2.0, compromising transparency from a proposal and assessment perspective. One wonders if such an approach is done deliberately 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*”, there appears no such analysis.

The project must be put on hold until such fundamental information is provided, especially as many alternatives have been identified with far fewer environmental impacts and better economics, both within and outside KNP.

The concept of offsets for destroyed habitats is flawed. The rare and endangered sub-alpine habitat of KNP cannot be replaced.

### **Conclusion**

We ask that the Minister for Planning, Industry and Environment reject the plans for Snowy Hydro 2.

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 scale and severity of environmental impacts are incompatible with any perceived environmental, economic and community benefits of the project.

Yours sincerely,

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