

PROPOSED SNOWY 2.0 DEVELOPMENT IN KOSCIUSZKO NATIONAL PARK

A submission to the Environmental Impact Statement

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This is a personal submission as a period recovering from surgery has precluded wide enough consultation to make a representation on behalf of the full Australian membership of the IUCN World Commission on Protected Areas. However, this proposal is of concern not only to Australians, but to the protected area global community which I represent, as it is unlikely that a project of such immense size and environmental destruction has ever before been proposed within a formal protected area. .

This submission is based on interactions with knowledgeable members of the Commission, in particular Dr. Graeme Worboys who is acknowledged as one of Australia's leading authorities on Kosciuszko.

There is widespread consensus that Australia needs a secure energy future based on clean energy sources which do not increase carbon dioxide pollution of the atmosphere and exacerbate climate change. Hydro-schemes can be one source of such energy.

However the location of Snowy 2 is proposed for a globally unique alpine area, home to many species entirely unknown in the rest of the world. It is an iconic park much loved by many Australians. In a largely flat continent it provides the majesty and beauty of the mountains. Despite all the impacts it has suffered, it still retains many areas of wild, aesthetic beauty and cultural evidence of Indigenous people. These rare qualities attract visitors and in turn support the ski industry and local economies. This is not just 'vacant land' for another 'nation building' engineering scheme. It is part of the national heritage of Australia and many would argue should be part of the World's Heritage.

When the original Snowy Mountains Scheme took place there was poor recognition of the ecological or aesthetic importance of the area and a great deal of damage, some of it very long lasting or permanent occurred. As a result the National Parks Service has had to make a costly effort to try to address and correct this damage and restore the ecological integrity of this valuable part of Australia. This damage must not happen again.

Issues with the current Snowy 2.0 Scheme:

1. Unacceptable loss of natural National Heritage listed lands.

Kosciuszko National Park(KNP) was set aside to be actively managed for its natural values but the proposed Snowy 2 will impact and permanent modify a very large area of the this protected area. The disturbance footprint is cited to be "just" 0.25% of KNP. However according to the National Parks Association of NSW the EIS is seriously understating the real impact "*the claim that only 0.25% of KNP would be impacted by Snowy is incorrect and highly misleading*" (NPA NSW Submission p.4). In this valued natural area it will mean roadbuilding, vegetation clearance, earthworks, dumping and damage to streams and water. However the % is not the only issue it is the importance of the areas impacted. The reality is Snowy 2 will particularly impact areas of high natural importance.

Most of the Snowy 2 area is in the special “Back Country Zone” that is managed for its essentially natural condition (2006 KNP Plan of Management). This Back Country Zone includes three “Management Units” that will be impacted by the Snowy 2 developments including the:

- Murrumbidgee Management Unit: Managed for its natural values (Sub-alpine plateau)
- Yarrangobilly Management Unit: Managed for its Outstanding Natural Resources (Limestone and montane forests)
- Tumut Management Unit: Managed for its natural values (Montane Forests of the Deep Northern Valleys)

These unique Natural Heritage listed Management Units (published 1982 POM) will have a much greater proportion of area impacted than 0.25%. The current design and associated enhanced road systems and new power lines will also have substantial impacts, and would inevitably mean an unacceptable loss of natural values.

It is also important to recognise that the uniqueness of these ecosystems makes the concept of offset compensation very unlikely.

2. New Threats

It defies imagination that the Australian government is seriously proposing that 14 million cubic metres of excavated spoil, some of which contains asbestos and/or is acidic, will be dumped in Kosciuszko National Park. Most of the spoil will go into Talbingo and Tantangara Reservoirs, decreasing their storage capacities, with the remainder to go into roads or to ‘landscape’ the park.

There are also immense threats to the valuable hydrology of the Park through the extensive tunnelling proposed which may lower water tables. Kosciuszko’s montane streams and water are already under multiple threats and need greater protection for vulnerable habitats and native species, not greater stresses.

There is also a threat that noxious pests and weeds will be spread throughout the Snowy Scheme and downstream, including Redfin Perch and aquatic weeds. These pests and weeds could be transported from Talbingo Reservoir up to pest-free Tantangara, the Upper Murrumbidgee catchment, and then to Eucumbene and throughout the Snowy Scheme and downstream rivers.

3. Lack of acknowledgment and commitment to the KNP plan of management

The EIS fails to reflect or account for the implications of proposing a major infrastructure project on land gazetted under the *National Parks and Wildlife Act* (NPW Act). It applies the standard environmental impact assessment process and shows little recognition of the purposes for which national parks are gazetted. KNP already copes with the impacts of the Snowy Scheme and associated power lines - seven power stations, 16 major dams, 145 kilometres of interconnected tunnels, 80 Kilometres of aqueducts and major transmission lines through the park. It has therefore been a major challenge for KNP’s management to retain the remaining natural areas in a natural condition. The KNP 2006 Plan of Management (POM) provides leadership for the conservation objectives of conservation and restoration. However the EIS appears to be silent about KNP’s management objectives, rather than seeing them as a central constraint. This lack of consideration is evidenced by the siting much of Snowy 2 into an important Zoned “natural area”. This is in direct conflict with the management objectives of this area.

4. Restoration

The EIS foreshadows restoration, but there is an absence of a commitment to returning the landscape to how it was. There is no driving objective by the EIS to return the park to its previous state. Tracks will become roads, but there is no commitment to returning them to low key tracks. Dams will receive infill and are suggested as visitor amenity sites rather than respecting the POM planning direction of retaining a natural amenity for that area.

5. A New Approach

The world, including Australia is committed to Sustainable Development Goals. These global goals to work with nature, to achieve Life on Land, Clean Water and Affordable and Clean Energy are all relevant to Snowy 2. It is vital that the government in its deliberations considers these commitments to future generations as well as the profound obligations intrinsic to the declaration of KNP as a national park.

Others such as NPA NSW have made strong arguments on the weakness of the economic case and the case for alternatives. I have not had adequate capacity to scrutinise those areas. My conclusion however that is the current EIS has inadequately reflected the considerations set out above and should be substantially revised.

A new EIS should the project remain should reflect a deep commitment to sustainability and nature protection should be embedded in its planning and the culture of all those who implement those plans. The travesty would be if we simply repeat the determined, but ecologically blind, engineering focus of the past and further compromise and degrade an outstanding part of Australia.



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