



I N L A N D
R I V E R S
N E T W O R K

PO Box 216, DUBBO NSW 2830

ph 0428 817 282

email inlandriversnetwork@gmail.com

web inlandriversnetwork.org

ABN 34 373 750 383

DPHI
PO Box 9898
Sydney NSW 2000

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Submission of Objection
Snowy 2.0 Main Works Modification 3
SSI-9687-Mod 3

The Inland Rivers Network (“IRN”) is a coalition of environment groups and individuals concerned about the degradation of the rivers, wetlands and groundwaters of the Murray-Darling Basin. It has been advocating for the conservation of rivers, wetlands and groundwater in the Murray-Darling Basin since 1991.

Member groups include the Australian Conservation Foundation; the Nature Conservation Council of NSW; the National Parks Association of NSW; Friends of the Earth; Central West Environment Council; and Healthy Rivers Dubbo.

IRN strongly objects to the proposed modification to the main works for Snowy 2.0 because of the inadequacy of the assessment of impacts on sensitive upland wetlands, in the form of string bogs, found in the proposed new area of disturbance.

The potentially irreversible damage to the hydrological sustainability and function of the upper catchment, including the string bogs, by the construction of new roads and extension of heavy vehicle access; and the short and long term storage of extracted spoil has not been assessed.

The cumulative impact of these proposed additional works on the hydrology of this extremely sensitive, top of catchment landscape is also not assessed.

The wetland areas known as string bogs are associated with silty bog soils where water is at or near the surface. They were recorded in 1948 and 1950 by Australia’s most eminent alpine ecologist (late) Dr Alec Costin. Their formation likely dated back to periglacial activity during the last ice age (over 15,000 -35,000 years ago) and are of outstanding scientific and conservation significance.

Several decades of mire studies by palaeoecologists and ecologists are summarised in the 2012 technical report: 'Peat-forming bogs and fens of the Snowy Mountains of NSW'¹

It is critical that an assessment of impacts on these significant wetland areas, associated with the water table, is conducted by an independent water and bogs expert to fully understand the environmental cost of the proposed additional infrastructure including roads and new tunnel.

The damage caused by roads and heavy vehicle movements over these sensitive landscape and irreplaceable hydrological features must be clearly identified and considered.

Yours sincerely,

A handwritten signature in black ink that reads "B. Smiles". The signature is written in a cursive, slightly informal style.

Bev Smiles
President

¹ <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Types-of-protected-areas/peat-forming-bogs-and-fens-snowy-mountains-technical-report-120257.pdf>