

**Submission in response to
Snowy 2.0 Connection Project EIS (Application No SSI-9717
3 April 2021**

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This submission is to express my opposition to the proposed project in its current form.

My submission is made as a retired environmental consultant who, for several decades worked at the interface between land uses for a diversity of commercial purposes, biodiversity conservation, and fire management. Although no longer working regularly in this field, my respect for and enjoyment of our National Parks and their role as a centrepiece to conservation remain as strong as ever.

REASONS FOR OPPOSING THE PROJECT

It is my considered view that this Connection Project, as proposed, fails to adequately address an appropriate balance between development and protection of threatened species, their habitats and broader aspects of biodiversity conservation.

Having reviewed the EIS and supporting documents, my reasons for opposing the project as proposed are discussed briefly below.

Failure to adequately address Principles of Ecologically Sustainable Development

Both the Commonwealth *Environment Protection & Biodiversity Conservation Act* 1999 (EPBC Act 1999) the NSW *Environment Planning & Assessment Act* 1979 (EP&A Act 1979), against which this proposed project are being assessed, are predicated on a set of principles.

Despite assertions to the contrary in the EIS (Ch 9), the project as proposed does not adequately meet the requirements of the **Precautionary principle**. Scientific certainty as to the future of the several nationally threatened species affected by the proposed project is far from clear.

The EIS acknowledges that the proposed project will have impacts on the habitat of nationally listed species including the Yellow-bellied Glider, the Squirrel Glider, the Eastern Pygmy Possum, the Gang-Gang Cockatoo, the Powerful Owl, the masked Owl and the Boorolong Frog. Much of the habitat of these species has been removed by severe bushfires that affected vast tracts of land in the region and the recovery of habitat for these species remains uncertain at this time. Addition of pressure from habitat removal, disruption to movement corridors, and acknowledged increased risks to biodiversity add to the uncertainty of the future of these listed threatened species. These impacts, deemed in the EIS not to be 'significant' are inconsistent with the ESD principle of the **conservation of biodiversity and ecological integrity**.

Failure to adequately meet the objects of the EP&A Act (NSW, as follows.

The Connection Project, as proposed, fails to meet several objects of the EP&A Act, as follows.

(a) To promote social and economic welfare...and a better environment by the proper management, development and conservation of the State's natural and other resources

Permanent impacts of the project on the visual amenity of the National Park are acknowledged in the EIS. However, they are under-recognised and are inappropriately described as having "been minimised to the fullest extent possible"

The proposed overhead lines and their supporting towers will traverse some eight kilometres along a 200 metre wide cleared easement across the National Park. Estimated are that the proposed two

sets of 75 metre high towers will be visible over 250 square kilometres of wilderness. Furthermore, this takes no account of suggestions post-summer 2019-20, that clearing under power transmission lines may be increased.

The alternative of micro-tunnelling/HDD lines lists much lesser transmission lines and impacts on biodiversity and visual impacts as 'key environmental issues' but these are clearly not factors in favour of that option over the proposed major overhead lines.

(b) To facilitate ecologically sustainable development

As submitted above, the Connection Project as proposed, fails to meet the principles of ESD.

e) To protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their Habitat

As discussed above and in consideration of Offsetting (see below), this criterion is not adequately addressed.

f) To promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)

That four sites of Aboriginal significance will have seriously affected is acknowledged in the EIS. However, the mechanism for addressing this destruction is no better than that proposed for 'offsetting' of damage to biodiversity. Greater commitment to protection of culturally significant Aboriginal sites must be recognised following recent major national examples of reliance on inadequate legislative protection.

Throughout the EIS, there is as strong reliance on 'Offsetting' as a mechanism for addressing impacts on biodiversity. This is addressed below.

Failure to observe requirements of the NSW National Parks & Wildlife Act and related Plans of Management

As is acknowledged in section 2.4 of the EIS, one of the stated management objectives of the Kosciuszko National Park Plan of Management is that "*Telecommunications and electricity infrastructure are managed in ways that minimise adverse impacts on the values of the park and other users*". No major transmission lines have been constructed in NSW National Parks since the 1970s, and since 2006 the Kosciuszko National Park Plan of Management has required that any additional transmission lines in the Park are located underground.

Inadequate consideration of climate change impacts on bushfire frequency and extent

Following the catastrophic bushfires of summer 2019-20, there has been a considerable focus on the likelihood of increased frequency and intensity of bushfires in Australia, with the south-east and south-west of the country predicted to be most affected. To develop major transmission lines across large areas of significant natural value under these circumstances is irresponsible under such circumstances.

In places overhead transmission lines are no longer acceptable in environmentally sensitive areas, with undergrounding of cables the accepted option.

Consideration of undergrounding options

Section 3.2.2.1 of the EIS does consider options. It dismisses 'underground 'deep cable tunnel' options and trenched cables' as 'unsuitable options', even though other already approved aspects of the Snowy 2.0 project involve "a series of underground tunnels and constructing a new underground hydroelectric power station" (EIS, p.i).

Even more concerning is the fact that the EIS rejects a micro-tunnelling or HDD option (presumably at least in part on cost grounds) even though it is acknowledged as “potentially suitable”. When the numerous unacceptable impacts of the proposed overhead transmission line, discussed below, it is clear that the balance is towards the financial considerations of the proponents at the expense of the environment and biodiversity conservation.

Over-reliance on ‘offsetting’

As discussed in Appendix B to the EIS, the Connection project relies heavily on a Biodiversity Offset Strategy, which is to be developed at a later stage in this proposed project’s development.

In the first instance, this is asking the wider community to place trust in the capacity of a strategy that is yet to be developed, to ensure that key threatened species and their habitat are protected.

That is a particularly significant concern given the Biodiversity Offset Strategy is directed to the proponent making “payments to the NPWS to offset the residual biodiversity impacts of the project” with NPWS, to “carry out actions to significantly improve catchment health, strengthen ecosystems, protect threatened species and communities and deliver long-term strategic conservation benefits for the KNP”. While these are laudable actions for which NPWS undoubtedly requires additional resources, they are not directly specifically to the outcomes for species affected by the proposed Connection project.

CONCLUSIONS

The project as proposed should be rejected.

The significant failings of the EIS to adequately address ESD principles, impacts on threatened species and their habitat, Aboriginal heritage and the amenity of one of Australia’s significant wilderness areas cannot be supported. This is particularly so, given there is an alternative which is feasible. Transgrid/Snowy Hydro profits do not justify the proposed major overhead transmission line.