



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

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

Dear Project Team

Submission on Snowy 2.0 Main Works Environmental Impact Statement

Thank you for the opportunity to make a submission on the Snowy 2.0 Main Works Environmental Impact Statement (the EIS). The National Parks Association of the ACT (NPA ACT) is a community-based conservation organisation with more than fifty years of working to protect our natural environment through an active outings and work party program; participation in Parkcare activities; an extensive publication program; public meetings and conferences and engagement with government policies and programs.

The NPA ACT has a particular interest in Kosciuszko National Park (KNP). NPA ACT members are regular visitors to KNP and have become increasingly concerned about the number of threats affecting the environmental values of KNP. These threats range from climate change to invasive plants and feral animals.

The NPA ACT believes that Snowy 2.0 places significant additional pressures on the environmental values of KNP which outweigh the benefits of that project and strongly objects to the implementation of Snowy 2.0.

KNP is one of Australia's premier national parks and it is inappropriate for a project to be implemented that undermine the very basis for the creation of a national park, i.e. the conservation of nature. Given the range of environmental impacts that is expected to arise from Snowy 2.0 this is a project completely in the wrong place.

While the NPA ACT believes that pumped hydro projects are important components in the range of mechanisms available to reduce carbon emissions, there are many potential alternative sites that would not have the significant environmental impacts of Snowy 2.0 and these alternatives should be evaluated and adopted instead causing greater environmental damage to KNP.

Detailed comments are included as Attachment A.

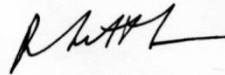
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Should you require any further information please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, Convenor, NPA ACT Environment Sub-committee.

Yours sincerely



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President
National Parks Association of the ACT



Rod Griffiths
Convenor, Environment Sub-committee
National Parks Association of the ACT

6 November 2019

NPA ACT Submission to Kosciuszko National Park Wild Horse Draft Management Plan Review

ATTACHMENT A - Detailed Comments

Environmental Impacts

The range of environmental damage to one of Australia's key national parks is staggering. Snowy 2.0's environmental impacts heavily affect KNP's sub-alpine regions. These are significant ecosystems already under pressure from climate change and incursions by weeds and feral animals. The EIS concedes that Snowy 2.0 will directly damage 3725 hectares including 992 hectares of threatened species habitat. The loss of sub-alpine habitat cannot be mitigated by offsets as very little of this ecosystem exists outside of national parks.

In addition to direct damage as per the EIS the actual project area impacts one third of KNP, one of Australia's most loved national parks. Construction on this scale is completely contrary to the key principle for the establishment of national parks, being the conservation of nature.

In addition, there is the visual impact of transmission lines tracking across KNP. Recently, in New South Wales, a windfarm project was rejected because of its "visual vandalism". That project was nothing compared to the aesthetic impact that Snowy 2.0 will have on KNP, with transmission lines and their easement affecting 10 kilometres of the park.

The EIS also concedes significant groundwater impacts from Snowy 2.0 and massive excavation and dumping within KNP of 14million cubic metres of spoil, irrevocably changing the ecosystems of KNP. The effect of these earthworks will lead to the drying up of streams and the bogs and fens on the plateau west of Tantangera dam, changes in the pH of local areas through dumping of acidic spoil and the introduction and spread of weeds. This is completely inappropriate for any national park but it is even more so in this case due to the importance of KNP.

It is also astounding that Snowy 2.0 will impact the efficiency of the original Snowy scheme through the reduction of storage capacities in Tantangara and Talbingo reservoirs through the dumping of 8 million cubic metres of spoil into them.

The EIS also recognises that there will be the introduction of feral fish species such as redfin and climbing galaxids into areas currently not infested by them. These species have the potential to out-compete local species such as the stocky galaxids. Again, this is a completely unacceptable environmental outcome.

Carbon Impacts

Pumped hydro is a mechanism to store water for later release into a hydro generation system. As such it can be an important component in the reduction of carbon emissions. However, to achieve these emission reduction aims the energy must come from renewable sources. Instead the EIS identifies that non-renewable sources of energy will be used to pump water into storage over the first 10 years of operation. During this time, there will be a net energy usage of 150

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GWh per annum. This means that Snowy 2.0 will fail one of its key justifications in the medium term.

Economics

Snowy 2.0 has seen significant increases in its project cost estimates. Its original budget was \$2 billion but already contracts have been let for more than \$5 billion. Given the size of the project, there is the potential for significant delays or additional construction difficulties that will significantly increase costs. Such increases would be consistent with historical trends for projects of this size and further brings into question the cost-benefits of this project.

Outputs and Alternatives

The stated maximum output of Snowy 2.0 is 350 GWh. However, this is only achievable in certain circumstances, and therefore overstates the actual achievable outputs from the project. Again it is astounding that the viability of other alternatives, as required under the *Environmental Planning and Assessment Regulation 2000*, have not been explored. In particular, examination of other sites has not been conducted in the EIS. A recent ANU project identified more than 8000 potential sites for pumped hydro in New South Wales alone with a generation potential vastly greater than that of Snowy 2.0. These alternative sites provide opportunities to enhance flexibility in the provision of pumped hydro services by spreading water supply risks. Snowy 2.0 increases its supply risk by being limited to one area. These alternatives have the potential to remove the significant environmental threats posed by Snowy 2.0 to KNP.