

Submission
No 4

**INQUIRY INTO ENVIRONMENTAL PLANNING AND
ASSESSMENT AMENDMENT (SNOWY 2.0 AND
TRANSMISSION PROJECT) ORDER 2018**

Organisation: National Parks Association of NSW

Name: Mr Alix Goodwin

Date received: 11 May 2018

The Hon Scott Farlow MLC
Chair
Regulation Committee
Legislative Council
Parliament House
SYDNEY NSW 2000

9th May 2018

Dear Mr Farlow

The National Parks Association of NSW (NPA) welcomes the opportunity to make a submission to the Legislative Council Inquiry into the Snowy 2.0 and Transmission Project State Significance and Critical State Significant Infrastructure (CSSI) Order issued by the Minister for Planning on 7 March 2018.

NPA was formed in 1957 to promote the concept of a network of national parks in NSW under specialist national parks and wildlife legislation managed by a professional agency. This goal was achieved with the passing of the National Parks and Wildlife Act 1974 and the establishment of the National Parks and Wildlife Service (NPWS). Today, in our 60th year, NPA continues to build on this work through a network of 16 branches and over 20,000 members and supporters. NPA promotes nature conservation and sound natural resource management. We have a particular interest in the protection of the State's biodiversity and its supporting ecological processes, both within and outside of the formal conservation reserve system. We are also the largest bushwalking group in NSW, running over 1,000 guided walks per year helping citizens enjoy our magnificent protected areas.

Recommendations

- (1) That the Minister be required to provide the Inquiry with a copy of the business case prepared for the Snowy 2.0 CSSI order in order to inform its deliberations. The business case should be made available to the public given the impact of the proposal on KNP which is recognised under the Commonwealth *Environmental Protection and Biodiversity Act 1999* (EPBC Act) as a matter of national environmental significance (MNES).
- (2) That the Inquiry recommend that Snowy Hydro Limited and TransGrid be required to submit an integrated Environmental Impact Statement for stages 1 to 5 and that no stage of the project be approved to proceed until this has been completed and exhibited for public comment, including the Exploratory Works.

Supporting Information

While NPA supports pump-storage in principle where it is integrated with renewable generation and not used to maintain coal-fired power generation, it does not support the construction of major infrastructure for this purpose within National Parks. National Parks and other protected areas are the primary means of safeguarding our biodiversity for future generations. KNP is one of Australia's premier National Parks, being the largest in NSW encompassing a unique alpine environment. It is affected by a number of key threatening processes including climate change.

The proposed Snowy 2.0 Project would unquestionably have a substantial detrimental impact on MNES as defined in the EPBC Act. Whilst some may contend that Snowy 2.0 would be a relatively minor addition to the original Snowy Scheme, it would be a major project in its own right with substantial permanent adverse impacts over an extensive area of KNP.

Setting aside our fundamental objection to any major project within KNP, the division of the environmental assessment process into five separate stages avoids a comprehensive overall assessment of the entire project. This is exacerbated by the fact that there are two project proponents – Snowy Hydro (exploratory works, tunnels and power and pump station) and TransGrid (transmission works within and outside the park). Clearly all five stages of Snowy 2.0 are integrated and rely on each other for the project to operate. Following such a piece-meal assessment approach separates the environmental impacts and avoids an overall examination of all the impacts at one time. It will result in an incremental assessment of ever-accumulating environmental impacts; impacts which should be seen within the context of other developments and existing threats to KNP including feral and domestic horses in the northern section, the recently announced \$27m expansion of walking and cycle paths in the Mt Kosciuszko/Thredbo section of the park, and possible expansion of resorts.

The Preliminary Environment Assessment (PEA) for the Exploratory Works states (p.47):

The biodiversity values of the subalpine and montane areas in the Exploratory Works project area are unique, and support unique species and vegetation communities. The seasonal presence of snow sets the Australian Alps apart from most other places on mainland Australia. Beyond this, the Alps contain unusual assemblages of plants and animals, many of which are endemic to the Snowy mountains (DEC 2006).

The alpine and subalpine flora of the park is significant due to its diversity and uniqueness. The fauna of the KNP is also significant due to its diversity in relation to reptiles at high altitudes, and the number of cold-climate species of the alpine and subalpine areas. Other significant biodiversity features include the upper slope and inverted treelines and associated subalpine treeless flats and valleys, and changes in elevation resulting in different and unique flora and fauna assemblages across the project.

The PEA identifies one threatened ecological community within the broader project area, an endangered ecological community under the NSW *Biodiversity Conservation Act 2016* (Montane Peatlands and Swamps), and one endangered ecological community under the EPBC Act (Sphagnum Bogs and Associated Fens). Threatened fauna species identified include the Smoky Mouse, Eastern Pygmy-possum, Broad-toothed Rat, Boorolong Frog and Alpine She-oak Skink (pp47-48).

The nature of the Stage 1 Exploratory Works (which also form part of the permanent works) alone demonstrate the significance and likely environmental impacts of Snowy 2.0, and include:

- Access roads – over 20km of existing tracks and new roads. If the full project proceeds the road works for Stage 1 will be substantially augmented.
- Barge access – infrastructure at Talbingo Reservoir and Middle Bay, near Lob’s Hole.
- Exploratory tunnel, construction pad and portal.
- Lob’s Hole Construction Compound – destroying all native flora and fauna over 20ha and disturbing previously contaminated land and materials. The PEA refers to “the region holding outstanding values due to the importance of Aboriginal social gatherings, based on Bogon moth

feasting and ceremonial gatherings” and “historic heritage items in proximity to the Exploratory Works”.

- Placement of excavated rock from the 4km tunnel – 0.5-0.75 million cubic metres covering 10ha. It is proposed that the rock be stored temporarily on-site, with long-term storage elsewhere decided later.
- Construction of a telecommunications tower.

These significant detrimental environmental impacts are dwarfed by those incurred by the total project, which include:

- Placement of tens of millions of cubic metres of excavated rock – from the underground power station and 27km of tunnels.
- Potential changes in underground water flows along the route of the tunnels, with reductions in surface water retention and flows.
- Transporting of noxious and non-native fish from Talbingo into the Tantangara Reservoir and its downstream rivers. Whilst attempts may be made to stop this, it is unavoidable.
- Transmission towers, lines and easements – two 330kV double-circuit lines, with an easement swath 10km long and 100m wide through pristine bush
- Ongoing disturbance from management and maintenance activity, including service roads, and increased visitor numbers due to road improvements.

Given this, NPA is of the view that that Snowy Hydro Limited and TransGrid should be required to submit an integrated and comprehensive Environmental Impact Statement for stages 1 to 5 and that no stage of the project should be approved to proceed until this has been completed and exhibited for public comment, including the Exploratory Works.

NPA is also concerned that the decision to proceed with Snowy 2.0 is being made without a full assessment of other options for the generation and storage of power in response to supply pressures and which may also have a lower environmental impact. Without a thorough assessment of the options available to deliver a clean electricity system fit for the 21st century, it is not possible to assess whether Snowy 2.0 may become redundant and/or economically unviable due to technological improvements and changes to the market approach to energy production and supply in the future. Unfortunately, it is not possible to know whether the government has considered other options for addressing current challenges facing the National Electricity Market and the extent to which changes in technology and supply models have been considered as the business case on the economic, environmental and social impacts of Snowy 2.0 developed to enable the Minister for Planning to make a decision on the issuing of the CSSI order has not been released to the public. NPA believes that the Inquiry should require the NSW Government to provide it with a copy of the business case to inform its deliberations and that this should also be released to the public.

Should you wish to discuss this submission I may be contacted on phone 9299-0000.

Yours sincerely

Alix Goodwin
Chief Executive Officer

