

Open Letter
6 April 2020

The Hon Rob Stokes MP
Minister for Planning and Public Spaces

The Hon Matt Kean MP
Minister for Energy and Environment

Approving the Snowy 2.0 EIS would have unprecedented environmental ramifications

Dear Ministers,

We appeal to you to not approve the Environmental Impact Statement (EIS) for the Main Works of the Snowy 2.0 pumped storage project, located in Kosciuszko National Park (the Park).

Your decision is of profound importance. The consequences of approval would endure for many hundreds of years. This letter adds its voice to those 30 experts who last week signed an Open Letter to the Prime Minister and NSW Premier, copied to yourselves. That Letter called for a comprehensive public review of Snowy 2.0 and alternative energy management options before the Commonwealth Government considers its final approval for the project and the NSW Government completes its assessment of the EISs.

That Letter contends that Snowy 2.0 is not vital for the transition to renewable energy, would incur vast greenhouse gas emissions, not deliver its claimed benefits to the National Electricity Market, lose around 40% of energy cycled and permanently damage a large expanse of the Park. It was noted that there are many pumped hydro alternatives and other energy storage options that are more efficient and cheaper, and without such significant environment impacts.

In this letter we wish to highlight to you, as the relevant NSW Ministers, the environmental and protected area policy issues, the environmental ramifications of the project and the unparalleled precedents that approval would establish.

As you would be aware, in 2014 the Australian and NSW governments hosted the largest gathering in the world on National Parks and Protected Areas – the International Union for Conservation of Nature (IUCN) World Parks Congress. That event showcased the many examples of best practice in park declaration and management around Australia. We were part of the outcome “The Promise of Sydney” which stated that protected areas are *“critical to life on earth and must be protected at much greater scale”* and that *“we recognize that threats to nature, its biological diversity and protected areas are now at the highest level in human history, due to a convergence at immense scale of the impacts of human consumption patterns, population growth, and industrial activity”*. We pledged *“to ensure that protected areas do not regress but rather progress.”*

We believe Australia and NSW would not be honouring our high standards of park management, nor the undertakings of the Promise of Sydney, by the profoundly detrimental precedents that would be established should you approve such a massive industrial development in a National Park.

Instead NSW would consciously erode internationally accepted IUCN standards for National Parks by:

1. Endorsing the construction of a massive industrial development, extending over thousands of hectares, with unparalleled adverse environmental impacts.
2. Dumping fourteen million cubic metres of excavated spoil, much of it contaminated with asbestos and acid-forming compounds, in the Park. The waste is to be dumped on land and in reservoirs, leaching out harmful materials for decades, resulting in untold damage to waterways and catchments.

3. Approving the transfer of pest fish, aquatic diseases and weeds between catchments and waterways in the Park and beyond:
 - invasive pest species, including Redfin Perch and Climbing Galaxias (native to coastal NSW but invasive when artificially spread), would be pumped from Talbingo up into Tantangara Reservoir and thereby throughout the Snowy Scheme into the Upper Murrumbidgee, Upper Tumut, Thredbo, Snowy and Murray Rivers – irrespective of the proposed barriers
 - aquatic diseases such as Epizootic Haematopoietic Necrosis Virus (EHNV) would be transferred by carrier fish, such as Redfin Perch, devastating both native fish and trout (impacting recreational fishing and hatcheries) throughout the Park and beyond
 - the seriousness of the impacts of the proposed transfers has required Snowy Hydro to seek a special exemption under the *NSW Biosecurity Act*
4. Condemning an entire species, the critically endangered Stocky Galaxias, to almost certain extinction, as well as destroying one of the most important remaining populations of the nationally endangered Macquarie Perch.
5. Destroying hundreds of hectares of alpine habitat essential for the continued survival of threatened flora, fauna and ecological communities, including extensive areas of Broad Toothed Rat habitat, an iconic alpine species now on the brink of extinction as a result of last summer's fires.
6. Endorsing the proposition that post-construction landscaping and plantings re-creates areas that are ecologically equivalent to the original undisturbed habitats.
7. Accepting numerous other environmental impacts, including:
 - two transmission lines traversing 10km of the Park, with a 120m wide easement swathe
 - lowered water tables and reduced stream flows above sections of the 27km tunnel
 - fragmented natural landscapes through the construction and widening of more than 100km of roads and tracks
 - the visual blight of infrastructure and landscape scars across the pristine Australian Alps
8. Ignoring other environmental pressures and impacts on the Park, including the recent bushfires, tens of thousands of feral horses, climate change and extensive residual damage at hundreds of locations from construction of the original Snowy Scheme. Kosciuszko and its precious alpine environment are in need of nurture and restoration, not further assault.
9. Incurring tens of millions of tonnes of greenhouse gases during construction and operation of Snowy 2.0, counteracting the NSW Government's target of net zero emissions and costing the Australian economy over \$100 million per annum.
10. Approving an EIS without the proponent fulfilling the mandatory requirements of the *Environmental Planning and Assessment Regulation* requiring "*an analysis of any feasible alternatives*" and a thorough assessment of cumulative impacts.
11. Approving one component of a project without a consolidated assessment of the impacts of the total project. The Transmission Line EIS has yet to be exhibited and its assessment should not be pre-determined. Both EISs must be considered concurrently as they are contingent on each other and each is a substantial development in its own right.

Snowy Hydro Ltd should be not be treated differently to any other developer. What developer would ever be granted the right to excavate and dump contaminated spoil, spread pests and diseases, render species extinct, destroy irreplaceable threatened species habitat, and clear vast areas of Kosciuszko or any other National Park in NSW or Australia?

The destruction that would result from Snowy 2.0 cannot be mitigated to any meaningful extent. No biodiversity offset arrangement or payment could in any way compensate for such impairment to this irreplaceable environment. Snowy Hydro has offered an offset-payment of \$36 million over 20 years – a contemptuous amount in the context of the damage that would be caused by a multi-billion-dollar project with exclusive use of the Park.

It would be tragic if Snowy 2.0 were to proceed, especially when there are better energy storage alternatives. At stake are vast areas of Kosciuszko National Park, the survival of many native species, tens of millions of tonnes of emissions and billions of dollars of Australian taxpayers' money.

Kosciuszko is very special. It is, despite the damage of the past and present, one of the most majestic areas in Australia and one of our planet's natural icons. It has fundamental cultural significance for Indigenous people and is very much loved and enjoyed by all Australians. Many of its plant and animal species are endemic to the Alps and virtually all are unique to Australia.

Ministers, Kosciuszko National Park would never be the same if this project goes ahead - the precedents set and the permanently damaged alpine environment would be grave legacies for the current NSW Government.



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