

Jim Betts
Secretary
NSW Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Director- Resource and Energy Assessments

Dear Sir/Madam,

Exhibition of Modification Application for Snowy 2.0 Exploratory Works (SSI 9208 MOD 1)

I refer to your letter of 25 June 2019, alerting NPA to an application by Snowy Hydro Corporation (SHC) to modify the Minister's approval for the Snowy 2.0 Exploratory Works.

The application by SHC is accompanied by the 562 page, two volume *Modification 1 Snowy 2.0 Exploratory Works Assessment Report* (the Report). The Report is on public exhibition until 9 July 2019, which with notification by post effectively allows only a few days for comment.

Snowy Hydro Corporation is well aware of the strong concerns of community stakeholders, including the National Parks Association of NSW (NPA), about the Snowy 2.0 project. NPA has met with senior representatives of SHC regarding the project and written on several occasions to the Minister for Planning, the Department of Planning and Environment and SHC on this issue. Nonetheless, Snowy Hydro Corporation declined to consult with community stakeholders about the proposed modification on the spurious basis that:

"The proposed modification is expected to have no impacts on the community beyond those anticipated for the Exploratory Works. The stakeholder engagement for Modification 1 has therefore focused on consultation with key agency stakeholders." Report Volume 1 p54

The works proposed under this amendment are significant in their scale and impact on Kosciusko National Park (KNP) They involve extensive clearance of native vegetation within KNP (more than 4 hectares plus an estimated 91 roadside trees), a 300% increase in heavy vehicle movements, expansion of the construction footprint, widening existing roadways and constructing additional roadways through the park and the installation of additional substation, towers and overhead lines.

NPA regards it as entirely inappropriate that environmental impacts of this scale and intensity in a national park should be assessed through the Section 5.25 process, especially where the application is accompanied by such as large Report and subject to a wholly inadequate consultation process. The assessment of major new environmental impacts through an amendment rather than a new application is particularly concerning given that SHC has stated that another four full Environmental Impact Statements (EIS) are in preparation for the Snowy 2.0 project. The proposed works should be incorporated into one of these EISs and thereby subject to the full statutory process, including public consultation.

The proposed amendment confirms our concern that the proponent's fragmented approach to environmental impact assessment seriously undermines the community's consideration of the full scale and intensity of environmental impacts associated with the Snowy 2.0 project.

Accordingly, NPA asks that:

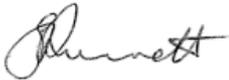
- 1. Snowy Hydro be required to consult with all community stakeholders about the proposed modification.**
- 2. the Department extend the submission period for at least 30 days after such consultations to enable community stakeholders sufficient time to prepare comments on the application.**

I have attached our preliminary comments on the application.

I would appreciate early response to these requests. I also await a response to our correspondence to Minister Stokes asking that he review the department's decision regarding the analysis of alternatives to Snowy 2.0.

I can be contacted at garyd@npansw.org.au or on 9299 0000.

Yours sincerely,



Gary Dunnett
Executive Officer
National Parks Association of NSW

NPA preliminary comments

1. Environmental impact assessment

The NPA wrote to the Minister for Planning on 26 April 2019 noting that SHC had publicly referred to certain works that had not been assessed as part the Exploratory Works EIS. It would appear that the works to which we alerted the Minister have been incorporated into the proposed modification.

NPA also requested that Minister Stokes review the departmental decision not to require *'an analysis of any feasible alternatives to the carrying out of the development'* in the Exploratory Works EIS. The current approval should not be amended until the requested review has been completed.

Applications under Section 5.25 of the *Environmental Planning and Assessment Act* are appropriately applied to minor modifications that do not substantially change the scale or intensity of environmental impacts. The proposed amendments, which requires a report of nearly 600 pages in length to document, does not represent a minor change to the original proposal. On the contrary, it involves:

- removal of 4 hectares of native vegetation
- removal of 91 trees on Lobs Hole Ravine Road and Mine Trail
- 300% increase in peak hour Heavy Vehicle movements
- widening and upgrading of roads to Lob's Hole
- construction of additional access tracks
- additional borehole sites
- construction of a new 330/33 kV substation, 50m high tower and overhead lines
- expansion of the construction footprint into the buffer area along the Yarrangobilly River
- 70 additional workers

A proposal of this magnitude, in the sensitive environmental setting of an alpine national park, clearly warrants a full EIS process.

In combination with the impending release of further EISs for the project, the proposed amendment continues the disjointed environmental impact assessment that has characterised the Snowy 2.0 project to date. The incremental release of critical information denies any holistic assessment of the environmental impacts on KNP. The process appears designed to isolate the impacts of each phase and avoid community scrutiny of the overall merits of the project.

2. Stakeholder consultation

The public exhibition period is insufficient for a proposal of this scale and impact. The posted notification provided NPA with less than a week before the submission closure, precluding a full assessment of the proposal. We ask that the deadline be extended.

Snowy Hydro Corporation has not consulted with community stakeholders regarding the proposed modification, relying upon the argument that:

'The proposed modification is expected to have no impacts on the community beyond those anticipated for the Exploratory Works. The stakeholder engagement for Modification 1 has therefore focused on consultation with key agency stakeholders.' Report Volume 1 p54

This argument is disingenuous as SHC has been repeatedly advised of the concerns of NPA and other community stakeholders about the Snowy 2.0 project. The assertion that the amendment involves no impacts beyond those already approved is simply inconsistent with SHC's application (see above).

The failure to consult with key stakeholders compromises the integrity of the environmental impact assessment process. Accordingly, we ask that Snowy Hydro be required to fully consult with stakeholders and that the department provide adequate time for stakeholders to assess the application and make submissions.

3. Impacts on Kosciuszko National Park

No infrastructure or activity causing significant and irreversible environmental damage should be permitted within a National Park. The proposed modification incurs additional significant environmental impacts to those already identified in the Exploratory Works EIS. Further substantial impacts are expected to be identified in the forthcoming EISs for the Main Works and transmission lines.

This level of environmental impact is completely unacceptable in a national park and stands in breach of NSW's national and international obligations for the appropriate management of protected landscapes.

4. Substation construction

It will take some time to construct and commission the proposed 330/33 kV substation. In the meantime, it is assumed that the diesel power station will be sufficient for construction supplies.

It would appear that the construction of the substation has been brought forward in anticipation of approval for the Main Works. This facility will be superfluous if the Main Works are not approved. The additional environmental impact is not justified as part of the 'exploratory' phase of the project.

5. Visibility of new tower

Page 29 *"The existing transmission Structure 54 will be replaced with a new steel lattice structure approximately 50 m in height."*

There is no consideration in the Report of the visual impact of the new structure. The visual character of KNP is an important element of the park's values and impacts on visual character should be formally assessed.

6. Power lines

Page 29 *"The 33kV construction power supply from the Lobs Hole substation to the Exploratory Works construction areas (including the accommodation camp and portal construction pad) will be reticulated by either overhead or underground cabling."*

Is the intention to use overhead or underground cabling and what are the environmental consequences of each option?

7. Economic justification

Page 45 *"Snowy Hydro's Feasibility Study completed in December 2017, provided a cost estimate, schedule and execution plan. The Feasibility Study found that Snowy 2.0 is expected to be economic, technically feasible and financeable (Snowy Hydro 2017)."*

The basic assumptions in the Feasibility Study have proved inaccurate. For example:

- the cost estimate of \$3.8 - \$4.5 billion for the project did not include all construction or transmission costs and has since been eclipsed by a single contract for \$5.1 billion.
- the construction schedule is now 8 years, double the original estimate.

The outdated Feasibility Study should not be relied upon to demonstrate that the project's economic viability. Following recent revelations by SHC, NPA estimates that the project's capital cost, including transmission, could be as high as \$10 billion (5 times the original estimate of \$2 billion).

The application omits a costing of the proposed modifications or assessment of the impact on the project's economic feasibility. There are real doubts that Snowy 2.0 is an economically responsible investment of public funds.

8. Exploratory Works

Page 45 *"4.1.2 Need for Exploratory Works*

The Exploratory Works are needed to ensure the detailed design and construction of Snowy 2.0 meets high standards for quality, safety, efficiency and the environment to meet the objectives of providing timely security and reliability to the NEM."

The Exploratory Works involve far more than exploration. The proposed construction of a permanent power supply to Lob's Hole provides further evidence that the 'Exploratory Works' are effectively the first stage of construction. Construction should be halted until the full EIS process has been completed.

9. Assessment of alternatives

Page 115 *"[Snowy 2.0] will provide a reliable, secure and relatively low cost and emission solution compared to other alternatives."*

Snowy Hydro Corporation has not provided a comparison of Snowy 2.0 with alternative options. NPA wrote to the Minister for Planning on 26 April 2019 requesting a review of the departmental decision to not require 'an analysis of any feasible alternatives to the carrying out of the development' when assessing the Exploratory Works EIS. We have yet to receive a response.

The project should not proceed until SHC meets its obligation under the Environmental Planning and Assessment Regulations to assess all feasible alternatives to Snowy 2.0 and demonstrates that it is the best option.

10. Life-cycle assessment

Page 115 *"Snowy 2.0 will provide long term reliable energy, environmental and economic benefits"*

Snowy Hydro have yet to provide a life-cycle assessment of the environmental impact of the project.

11. Monitoring

What monitoring of the works is proposed by government agencies? Will Snowy Hydro pay for those costs?