

Australian Edition

Shovel Ready!

EIS Approvals FOR DUMMIES

Jobs,
jobs,
jobs!



Australian Edition

Approving Environmental Impact Statements for DUMMIES (and MINISTERS)

This Dummies Guide reveals the very latest techniques devised by governments to approve Environmental Impact Statements (EIS) for major infrastructure projects. It outlines how even the most environmentally damaging project can be granted speedy approval.

The Guide is a must-have, ready reference for Ministers, bureaucrats, and industry leaders. It examines two recent examples of extraordinary approvals for mega industrial projects with unprecedented environmental impacts, one of which is even in a National Park.

Cheat Sheet. The project ...

- ✓ *is critical*
- ✓ *creates jobs, jobs, jobs*
- ✓ *stimulates recovery from COVID-19*
- ✓ *delivers significant economic benefits*
- ✓ *invests \$millions/billions*
- ✓ *has negligible environmental impact*
- ✓ *is in the public interest*
- ✓ *is subject to the strictest conditions*

EDITOR'S NOTE: this Guide is a spoof on what now passes for the environmental assessment process. Apologies to DUMMIES Publications, but their simple, concise explanatory format is ideal for exposing the cynical manipulation of due process now applied by governments when 'assessing' and approving Environmental Impact Statements, regardless of the environmental cost. Australia's natural environment is being ruined before our eyes, for illusory short-term purposes.

Project approval for DUMMIES

Contents

<u>1.</u>	<u>Introduction</u>	4
<u>2.</u>	<u>The Eight Standard Reasons for Approving a Project</u>	6
<u>2.1.</u>	<u>The project is critical</u>	6
<u>2.2.</u>	<u>Creates jobs, jobs, jobs</u>	7
<u>2.3.</u>	<u>Stimulates recovery from COVID-19</u>	8
<u>2.4.</u>	<u>Delivers significant economic benefits</u>	8
<u>2.5.</u>	<u>Reduces prices</u>	8
<u>2.6.</u>	<u>Environmental impacts minimised/ residual impacts ‘acceptable’</u>	9
<u>2.7.</u>	<u>In the public interest</u>	11
<u>2.8.</u>	<u>Approved, subject to the strictest conditions</u>	11
<u>3.</u>	<u>A ‘text-book’ Announcement and Press Conference</u>	12
	<u>Appendix A - Government Fast-tracking</u>	13
	<u>Appendix B – Synchronised wording for project approvals (Snowy 2.0 and Narrabri CSG)</u>	14

1. Introduction

It is essential in today's political scene for governments to be constantly promoting and approving major construction projects, regardless of merit and environmental consequence.

Every new project conveys progress and action - stimulating the economy, creating jobs etc. And every project provides media opportunities for politicians to be filmed at construction sites, garbed in spotless high-vis jackets, helmets and safety specs.

Governments have become reliant on a steady stream of announcements for all manner of projects – mines, power stations, highways, bridges, metros, dams, skyscrapers, casinos, technology parks, museums, stadiums etc.

The bigger and flashier the project, the better.

'Fast-tracked assessment processes' have been implemented to slash 'green and red tape'. 'Priority lists' of projects have been established. Further projects are excitedly added.

Common catch-phrases (use liberally)

- ✓ *Shovel-ready*
- ✓ *Jobs, jobs, jobs*
- ✓ *Removing bottle necks*
- ✓ *Slashing green tape*
- ✓ *Fast-tracked assessment*
- ✓ *Assessments are no less rigorous, just faster*
- ✓ *COVID-19 pandemic*
- ✓ *Public benefit*

Of course, at every opportunity the government needs to re-assure the public that the environmental assessment process has not become less rigorous, just more streamlined and faster. This is especially relevant when the project involves substantial environmental damage and has significant public opposition. And of course every project must be subject to the most stringent conditions ever applied.

More and more projects in NSW are now badged with an important sounding status such as "State Significant Development" (SSD)¹, "State Significant Infrastructure (SSI)² and Critical State Significant Infrastructure (CSSI)². These projects are of the highest priority and demand urgent approval. Such categorisation 'switches off' certain environmental laws and severely limits the scope for pesky challenges of the inevitable approval of 'significant' projects.

NSW has an enviable track-record of never having rejected a project declared to be CSSI.

This Guide will help ensure this unblemished record is protected.

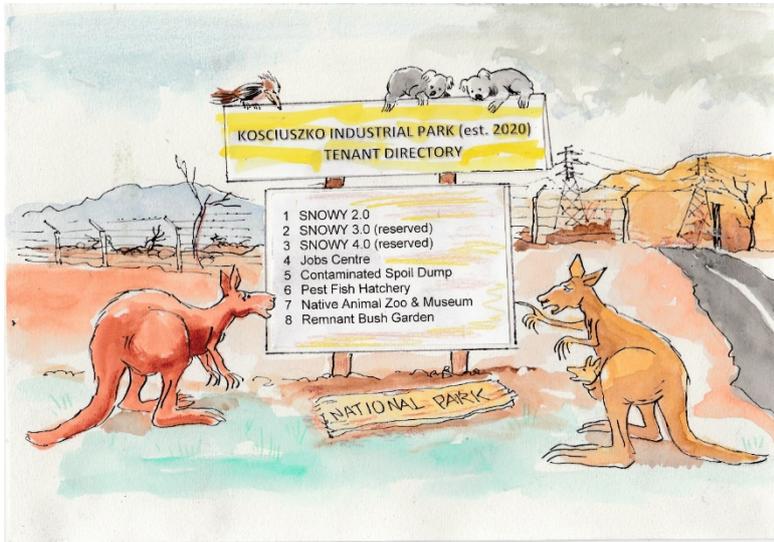
The Guide draws extensively on the NSW and Commonwealth Governments' well-oiled assessment processes for major development and infrastructure projects.

In particular, much of the source material comes from two recent projects. Both are highly controversial, with significant environmental impacts and overstated/false benefits, yet have been successfully rammed through. The techniques and standardised justifications applied, right down to the identical wording used in the approval decisions (Appendix B), are documented as a ready reference for future project approvals.

¹ "State Significant Development", NSW Department of Planning, Industry and Environment
<https://www.planning.nsw.gov.au/Assess-and-Regulate/Development-Assessment/Planning-Approval-Pathways/State-Significant-Development>

² "State Significant Infrastructure", NSW Department of Planning, Industry and Environment
<https://www.planning.nsw.gov.au/Assess-and-Regulate/Development-Assessment/Planning-Approval-Pathways/State-Significant-Infrastructure>

- i) **Snowy 2.0**^{3&4} - a 2,000 MW pumped hydro power station impacting 100 square kilometres of Kosciuszko National Park, is a fine example of a “Critical State Significant Infrastructure” project.



Snowy 2.0 Main Works was approved by the NSW Government on 20 May 2020 and subsequently ‘rubber-stamped’ by the Commonwealth Government on 29 July 2020.

The mind boggles at the potential for further projects and developments that could be approved across all our National Parks.

- ii) **Narrabri Coal Seam Gas**⁵ - drilling 850 wells across 950 square kilometres of Pilliga State Forest and adjoining land, is an excellent example of a “State Significant Development” project.



Narrabri Gas project was supported by the NSW Department of Planning, Industry and Environment on 11 June 2020 and has been referred for determination by the Independent Planning Commission.

Aerial shot of a portion of Santos’s CSG ‘exploration’ project, showing a stunning labyrinth of 11 wells and tracks. Just imagine the amazing vista of 80 times the number of wells when the full project receives final approval.

³ “Snowy 2.0 Main Works Notice of Decision”, 20 May 2020 <https://www.planningportal.nsw.gov.au/major-projects/project/12891https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-9687%2120200520T224223.775%20GMT>

⁴ “Snowy 2.0 Main Works (SSI 9687) Assessment Report”, 20 May 2020 <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-9687%2120200520T224223.775%20GMT>

⁵ “Narrabri Gas Project (SSD 6367) SSD Report”, 11 June 2020 <https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2020/03/narrabri-gas-project/referral-from-the-department-of-planning-industry-and-environment/dpie-final-assessment-report.pdf>

2. The Eight Standard Reasons for Approving a Project

Adherence to the eight standard reasons identified in this Guide should ensure that any project can be justified for approval.

Eight Standard Reasons for Approving a Project

1. It is critical
2. Creates jobs, jobs, jobs
3. Stimulates recovery from COVID-19
4. Delivers significant economic benefits (invests \$millions/billions)
5. Reduces prices (apply when relevant)
6. Environmental impacts minimized/ residual impacts reduced to an acceptable level
7. In the public interest
8. Approved subject to the strictest conditions

Each of these reasons are examined below.

2.1. The project is critical

Projects should be portrayed as critical, with dire consequences if not approved – e.g. the lights will go out, or we will run out of gas, or prices will skyrocket.

Snowy Hydro MD, Paul Broad

“you have to have Snowy 2.0 in place or you are dreaming, and you will have lots of blackouts”

Business NSW CEO, Stephen Cartwright

“without the Narrabri project coming on line, supply will just about disappear, costs will soar, and businesses will be forced to close, meaning even more jobs will be lost in NSW”

NSW Premier, Gladys Berejiklian

“gas was critical to a very smooth transition to other options in terms of our own energy supply. If you do want to use more renewables, you need more gas, because when you are moving from peak to off-peak you actually need gas to facilitate that, so this plan makes perfect sense to us”

There is no need to explain such claims, just keep repeating them.

As an aside, there won't be 'lots of blackouts' if Snowy 2.0 isn't constructed as there are many alternative energy storages that are cheaper, more efficient and less environmentally damaging. Likewise, it would be paradoxical if NSW 'gas supply just about disappeared' without Narrabri CSG being constructed, when Australia is the world's largest exporter of liquefied natural gas.

To guarantee a project will be approved it should be deemed to be a State Significant Development (SSD), State Significant Infrastructure (SSI) or, better still, Critical State Significant Infrastructure (CSSI).

Critical State Significant Infrastructure status is awarded to projects that *in the opinion of the Minister are essential for the State for economic, environmental or social reasons (section 5.13, Environmental Planning and Assessment Act 1979).*

Of course, ‘economic reasons’ are the primary motivator. The inclusion of ‘environmental reasons’ in the criteria is merely to give the pretence that environmental issues are considered. Likewise, ‘social reasons’, other than jobs, can also be largely ignored.

CSSI status is specifically awarded to projects with the greatest environmental impact and affect the most sensitive aspects of the environment (see box).

History shows that once a project has been deemed critical it will always be approved, despite questionable merits or substantial environmental consequences.

SSD, SSI and CSSI projects are usually added to the Government’s Priority Listing and are thereby fast-tracked.

Appendix A details the fast-tracking arrangements recently implemented by the NSW and Commonwealth Governments, which draw liberally on the common catch-phrases and eight standard reasons identified in this Guide.

Politicians and industry leaders should always emphasise the criticality of projects and not hesitate using the scaremongering card of dire consequences if not approved.

CSSI Status for projects with greatest environmental impact²

“The Department of Planning, Industry and Environment has prepared Standard Secretary’s Environmental Assessment Requirements (SEARs) for CSSI projects The objectives of the Standard SEARs are to achieve a better outcome by focusing the environmental impact statement on those issues that:

- *cause the greatest impact;*
- *affect the most sensitive aspects of the environment; and*
- *are of greatest interest or concern to the community.”*

2.2. Creates jobs, jobs, jobs

The number of construction jobs must be at the forefront of every announcement, and repeated incessantly. The more times ‘jobs’ get a mention the better.

To inflate the numbers, add the indirect jobs for local businesses and the broader region.

Focus on construction jobs.

Don’t mention that construction jobs are only temporary and will vanish after a few years. And don’t mention what will happen when construction is complete and the local economy returns to where it was originally, unless there are potential future stages to keep the temporary employment going a bit longer.

Avoid referring to the number of permanent operational jobs, unless in the rare circumstance they are significant.

For example, Snowy 2.0 is lauded as creating 2,000 jobs during construction (up to 4,000 in some announcements). Cleverly, there has been no mention of the local downturn when Snowy 2.0 is completed nor the minimal ongoing operational jobs (viz. eight to sixteen). Though there have been occasional teasers for Snowy 3.0 and Snowy 4.0 – brilliant staging!

2.3. Stimulates recovery from COVID-19

Of course, nowadays it's a given that all project approvals be tagged as aiding the recovery from the COVID-19 pandemic.

The mention of COVID-19, novel coronavirus, pandemic, can justify anything.

Nothing further need be said on this go-to reason.

Santos Chief Executive, Kevin Gallagher
"a decision on the development [Narrabri CSG] is more important than ever after the Covid-19 shutdown"

NSW Minister for Planning, Rob Stokes
"the fast-tracked assessment program is a key part of the NSW Government's COVID-19 Recovery Plan as we continue to get shovel-ready projects out the door to keep people in jobs and keep the economy moving"

2.4. Delivers significant economic benefits

Always refer to 'significant economic benefits' from the project. Spending money always delivers economic benefits, even on worthless or harmful projects.

The greater the capital cost the better. Hundreds of millions of dollars, or better still, billions of dollars, will grab attention and increase the sense that the project is important and critical (Reason 1).

It matters not if the project is financed by the government and the cost is underestimated. The public are well conditioned to government infrastructure projects running well over time and budget. And there are multiple well-worn excuses to explain overruns – COVID, bad weather (wet, hot, bushfires, floods), greedy contractors, previous government mismanagement, environmental hurdles etc.

Mining proposals can always be justified by their huge profitability, which can be many billions of dollars over the life of the proposal. The fact that most of the profits are typically remitted to overseas owners is neither here nor there.

Nor does it matter if most of the expenditure is on overseas equipment or expertise, though obviously the more that can be spent in Australia and the local area the better.

It is important to stress the economic benefits to the specific region and local community from the increased activities. Grants to the local sports club go down well.

2.5. Reduces prices

Wherever possible, the project should be lauded for putting downward pressure on prices, irrespective of the reality. Any naysayers can be easily batted away by responding that bringing on more supply of any commodity will obviously reduce its price – 'it's a fundamental rule of supply/demand economics 1.01.

It doesn't matter when the proponent's own modelling shows that the project will actually increase, not decrease, prices. This is the case with Snowy 2.0, as confirmed in Snowy Hydro's own modelling report. This was an unfortunate oversight and a salutary lesson for proponents to scour their reports and delete all conflicting and negative information before publishing.

Nevertheless, when such an oversight occurs, follow the lead of the Energy Minister by ignoring the facts and keep repeating that the project will ‘bring down power prices’.

Commonwealth Minister for Energy and Emissions Reduction, Angus Taylor
“Snowy 2.0 will reduce volatility in the market, support reliability and bring down power prices for Australian families and businesses. Snowy 2.0 is a key part of the Government’s agenda to deliver affordable, reliable power and ensure Australians get a fair deal on energy.”

Narrabri CSG makes a similarly spurious claim for reducing the price of natural gas. Australian gas prices are inextricably linked to the world price and any additional local production will have no impact on NSW prices. This was confirmed by the Department of Planning Executive Director, David Kitto, at the IPC hearing *“we’re certainly not saying, in our assessment, that the Narrabri Gas Project will reduce gas prices”*.

2.6. Environmental impacts minimised/ residual impacts ‘acceptable’

Feign concern for the environment and state that the project will have an insignificant impact on the environment.

Santos Chief Executive Kevin Gallagher

“It’s very important to me, and to everyone at Santos, that no harm is caused to the environment, or to water. The EIS includes comprehensive data and scientific studies in concluding the Narrabri Gas Project would not have a significant impact on the ecology of the Pilliga Forrest.”

Stress that the environmental impacts of the project have been minimised, mitigated or eliminated.

Even be so bold as to suggest that the project will leave the site in better shape, as has been suggested for Snowy 2.0 on Kosciuszko National Park – i.e. the project will improve on nature.

Snowy Hydro MD, Paul Broad

“When we will leave this site, it will be better than what it was before we came. This scheme is ... protecting the Park. So, getting the environmental approvals through was fundamental”

Minister for the Environment, Sussan Ley

“Snowy 2.0 is good for the environment, absolutely fantastic. It’s all about improving our environment here in Kosciuszko National Park and keeping it pristine and helping the environment”

Give examples of the measures taken and of the reduced impacts that remain. A standard ploy is to compare the impact area of the project to a much larger base.

If necessary, include conditions that mask the real impact of the project and give the impression that something has been done.

An example of such ‘smoke and mirrors deception’ is the lauded installation of so-called barriers in the Snowy 2.0 project to stop the spread of pest fish and pathogens across the Snowy Mountains and downstream rivers. Independent experts dispute the effectiveness of such barriers, which have never been built before. The Planning Department’s own Report expresses *“uncertainty about how*

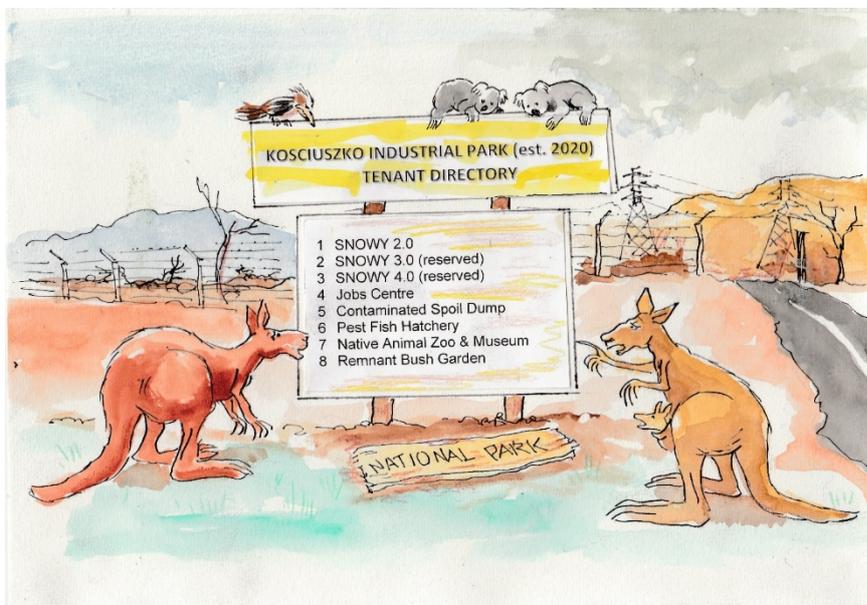
effective the fish screens and fish barrier will be over the long operational life of the project (potentially 100 years)”.

The important point is that mitigating action, costing many \$millions, has been taken to address the issue, irrespective of its effectiveness.

By the time the project is completed, and the pest fish have spread across the Snowy, devastating indigenous fish and the recreational fishing industry, the current politicians, bureaucrats and Snowy Hydro Directors/Managers will be long gone. Future generations will just have to accept one further instance of environmental mismanagement, repeating previous disasters like the introduction of carp, rabbits, foxes, pigs, feral horses, cane toads etc.

Keep emphasising that all residual impacts have been reduced to an ‘acceptable level’. But don’t be drawn into defining what that means.

As demonstrated by the approval of Snowy 2.0, applying these techniques paves the way for approving further industrial developments in National Parks – an unprecedented win.



Approval of Snowy 2.0 opens the door for all manner of industrial developments in National Parks – mines, logging, dams, grazing – there are no limits to what can be approved when applying the techniques in this Guide.

In some cases, a payment will be required by the proponent to compensate and offset the environmental damage. Such payments can be determined on the narrowest of bases.

It doesn’t matter if there are no practical offsets for the destruction of habitat or threatened species. The offset payment can be portrayed as compensating for the permanent damage.

Minister for the Environment, Sussan Ley

“Not only has the approval [for Snowy 2.0] paved the way for critical infrastructure that will help the environment, it has ensured vital funding for protecting the area’s biodiversity [i.e. Kosciuszko National Park]”

An excellent example of how to dismiss this issue is provided in the Snowy 2.0 Decision:

“the residual impacts of the project can be reduced to an acceptable level by requiring Snowy Hydro to rehabilitate the site to a high standard following construction and to contribute at least \$85.8 million (on top of the \$13.46 million already paid) to fund actions to enhance the KNP and address any remaining risks.”

The Prime Minister applied this approach perfectly when he referred to previously ‘barren areas’ of Kosciuszko National Park being transformed into roads, bridges, transmission lines and other infrastructure. And with a witty rhyme to finish – ‘on the go with Snowy two point o’.

Prime Minister, Scott Morrison

“So, it’s exciting to announce the green light for Snowy 2.0. It’s been a long way coming. As you can see, this used to be a goat track and now it is of a great standard in terms of the roadworks that have been put in, the bridges and the other things that have been necessary. Flying in here today you could see the scale of works done. And I remember, Paul, when we took that trip in the chopper to announce the final investment decision and you were telling me where it was all going to go and it was just barren areas across these places and now look at what’s happened in such a short period of time.

So, we’re on the go at Snowy 2.0.

2.7. In the public interest

Respectfully acknowledge all criticisms and objections, but then ignore them and quickly move on.

Our two example projects demonstrate this acknowledgement of overwhelming opposition and a ‘tin ear’ response:

Snowy 2.0: Only 5% of submissions supported the project. As stated in the Notice of Decision:

“Most submissions strongly opposed the project because of its impacts on Kosciuszko National Park and supported the NPA’s detailed submission, which objected on the basis that the project would have unprecedented impacts on KNP and that there are better alternatives to Snowy 2.0.”

Narrabri CSG: as stated in the Planning Department’s report:

“the Department received nearly 23,000 submissions on the project. Most of the submissions (98%) were against the project, raising three key strategic concerns:

- *almost universal opposition to gas development in NSW, arguing that urgent action is required to address climate change and transition away from fossil fuels*
- *the risks of non-conventional gas development*
- *the strategic justification for the project and the assessment of its impacts on water resources, biodiversity values of Pilliga State Forest, greenhouse gas emissions, and the local community”*

Conclude the approval with a general statement along the lines of “weighing all the relevant considerations, the project is clearly in the public interest”.

2.8. Approved, subject to the strictest conditions

Finally, it goes without saying that the approval of every project must be ‘subject to the most stringent of conditions ever applied’.

The more conditions the better. If possible, the Minister should refer to x hundred conditions or yy pages of conditions.

NSW Minister for Planning, Rob Stokes

“Snowy 2.0’s approval includes strict conditions to minimise and offset environmental impacts”

3. A 'text-book' Announcement and Press Conference

There is no better example of applying the techniques revealed in this Guide than the 'Doorstop' Press Conference at the Lobs Hole construction site, in the heart of Kosciuszko National Park, to announce environmental approval by the Commonwealth Government for Snowy 2.0. Also, the timing was perfect, being four days before the Eden-Monaro by-election.

The transcript⁶ provides a classic blueprint for all aspiring politicians, especially Ministers for Planning and the Environment. The extract from the Prime Minister's speech below epitomises the fundamentals outlined in this Guide, and ticks all the boxes - \$billions, jobs, local towns, nation-building, affordable energy, jobs (again), fast-tracked approval, environmental mitigation, critical for energy and emissions reduction, jobs (for the third time) and recovering from COVID. Superb!

The only minor quibble for the performance was that, whilst the dignitaries were decked out in sparkling safety garb, it is not of uniform design and someone forgot to provide safety specs.



Snowy 2.0 gets the 'thumbs up'

Minister for Energy and Emissions Reduction Angus Taylor, Eden-Monaro Liberal Party candidate Fiona Kotvojs, Prime Minister Scott Morrison and Snowy Hydro MD Paul Broad in front of the future entrance to the underground power station – 30 June 2020

Prime Minister, Scott Morrison

"Back at the end of 2018 ... we announced a final investment decision which saw us put \$1.4 billion into what is more than a \$5 billion project, over 2,000 jobs directly created through this project and those jobs feeding into all the local towns all around the Snowy. It's going to take a nation to build this project because it is a nation-building project, and it's addressing our emissions reductions targets, it's about getting affordable energy into the system and it's about creating these local jobs here. We will see a ramp-up in the works on this site here over the next two years like we have never seen before on this project since Snowy was built the first time. These next two years are absolutely vital to the success of this project. That's why we've always known we've had to get a wriggle on and get this thing approved, taking into account the important environmental mitigations which Sussan Ley will speak to because we know we need to get this up and running to meet our timetable for getting this energy into the system, to getting our emissions reduction targets achieved, and ensuring that the jobs that are so necessary now, even more necessary now than when we first approved the final investment decision for this project at a time as we're building our way out of the COVID recession."

⁶ "Snowy 2.0 Doorstop Announcement Lobs Hole", Prime Minister, 30 June 2020
<https://www.pm.gov.au/media/doorstop-lobs-hole-nsw>

Appendix A - Government Fast-tracking

The recent announcements of fast-tracking arrangements by the NSW and Commonwealth Governments draw liberally from the catch-phrases and standard reasons in this Guide.

A.1 NSW Government⁷

On 28 April 2020, the NSW Government announced *the first 24 projects to undergo a fast-tracked assessment process as part of the NSW Government's new Planning System Acceleration Program. A further 24 projects were announced in the second tranche* of the program on 22 May 2020.

The purpose of the Program is to redirect resources within the Department of Planning, Industry and Environment to accelerate the assessment and determination of projects that inject investment into the NSW economy and keep people in jobs during the COVID-19 pandemic.

The assessment process is being accelerated, not changed. The usual planning rules and policies will apply, and all projects will be assessed under the Environmental Planning and Assessment Act 1979.

The three essential criteria are:

- **Jobs** – does the project create jobs during construction and ongoing?
- **Timing** - can a decision on the project be made quickly?
- **Public benefit** – can the project deliver or support public benefits

A.2 Commonwealth Government⁸

To build the pipeline of future projects, we are determined to get out of the way and speed up progress by improving approvals processes.

According to departmental estimates, delays associated with these approvals alone cost industry over \$300 million just in 2019. That's not good enough. The Commonwealth has already taken steps to cut project approval times under the EPBC Act. At the end of 2019, approval decisions took 90 days on average. Today they take 40. That is what we've achieved this year in 2020. Our goal is to cut these times by a further 25 percent by the end of this year – to 30 days for major projects. Ultimately, our objective is the streamlining of Commonwealth and state processes to a point of 'single touch approvals'.

Today I announce a priority list of 15 major projects that are on the fast-track for approval under a bilateral model between the Commonwealth, states and territories. Projects that will support over 66,000 direct and indirect jobs. Under our new approach this investment, and most importantly, these jobs will be brought to market earlier.

I commend the New South Wales government who we have been working with. We are on track to complete Commonwealth assessment and approval for Snowy 2.0 in under two years - unlocking over 2,000 regional jobs.

Successful deregulation has increased competition and economic efficiency, raising productivity and, ultimately supporting jobs and wages.

⁷ "Fast-tracked Assessments", NSW Department of Planning, Industry and Environment, updated 1 July 2020

⁸ "Prime Minister's Address to CEDA's State of the Nation Conference", 15 June 2020

<https://www.pm.gov.au/media/address-%E2%80%93-ceda%E2%80%99s-state-nation-conference>

Appendix B – Synchronised wording for project approvals (Snowy 2.0 and Narrabri CSG)

Appendix B demonstrates the rigid adherence to the 8 Standard Reasons and the identical wording used to justify Snowy 2.0 (S2.0) and the Narrabri Coal Seam Gas (NCSG) project.

Words in italics have been extracted from the S2.0 Notice of Decision³ and the NCSG Assessment Report⁵. For ease of comparison, the reasons have been sorted, but no words have been changed, added, or deleted.

Reasons for Approval		Snowy 2.0 Notice of Decision	Narrabri Coal Seam Gas Assessment Report
1.	Project is critical (and plays an essential role)	<p><i>“the project is critical for energy security and reliability in NSW”</i> (Editor: There are many superior energy storage alternatives to S2.0)</p> <p><i>“would play an essential role”</i> (Ed: S2.0 is more expensive and inefficient than alternatives)</p> <p><i>“in helping to stabilise the NEM as it transitions away from a long-standing reliance on coal-fired power stations to a reliance on renewable energy”</i></p>	<p><i>“is critical for energy security and reliability in NSW”</i> (Editor: gas can be provided from alternative sources, including LNG import terminals and the mooted Queensland-Hunter pipeline.)</p> <p><i>“provide essential gas supplies to the domestic market to address forecast shortfalls from 2024”</i> (Ed: As the world’s largest exporter of LNG, Australia has plenty of gas)</p> <p><i>“support the development of gas-fired power stations in NSW to provide dispatchable energy to the National Electricity Market (NEM) as it transitions away from a long-term reliance on coal-fired power stations to a greater reliance on renewable energy”</i> (Ed: Many experts dispute the need for gas as a transition fuel)</p>
2.	Jobs, jobs, jobs	<p><i>“creating 2,000 construction jobs”</i> (Ed: Only 8-16 operational jobs)</p>	<p><i>“creating [1,300 construction] jobs”</i> (Ed: 200 operational jobs)</p>
3.	Recovery from COVID-19	<p><i>“it would deliver significant economic benefits to NSW and the Snowy Mountains region to assist the recovery from the COVID-19 pandemic”</i></p>	<p><i>“deliver significant economic benefits to NSW and the Narrabri region and stimulate the economic recovery from the effects of the COVID-19 pandemic”</i></p>

Reasons for Approval	Snowy 2.0 Notice of Decision	Narrabri Coal Seam Gas Assessment Report
<p>4. Delivers significant Economic Benefits and attracts investment</p>	<p><i>“attracting at least \$4.6 billion of capital investment”</i> (Ed: S2.0 will cost far more than \$4.6B. Experts predict closer to \$10B, when including transmission. Much of the expenditure will be on overseas equipment)</p>	<p><i>“attracting investment to the region</i></p> <ul style="list-style-type: none"> • <i>providing up to \$14.5 million to Narrabri Shire Council for community projects and infrastructure</i> • <i>setting up a Community Benefit Fund with up to \$120 million to share the benefits of the project with the local community</i> • <i>facilitating economic development in Narrabri, including the development of a new industrial estate”</i> <p>(Ed: NCSG has a stated capital value of \$3.6B. Much of the expenditure will be on overseas equipment)</p>
<p>5. Reduce energy prices</p>	<p><i>“helping to reduce electricity prices”</i> (Ed: S2.0 will increase, not reduce, electricity prices, according to Snowy Hydro’s own modelling)</p>	<p><i>“put downward pressure on gas prices”</i> (Ed: NCSG will have no influence on NSW gas prices, as they are tied to the world price)</p>
<p>6. Increase use of infrastructure</p>	<p><i>“it would maximise the use of the existing Snowy scheme”</i> (Ed: S2.0 would increase, rather than ‘maximise’, the use of the Snowy Scheme. S2.0 requires the construction of many 100’s kms of transmission lines, costing \$billions)</p>	<p><i>“facilitate the extension of the existing gas pipeline network to northern NSW, bringing it closer to the strategic gas supplies in both Queensland and the Northern Territory”</i> (Ed: NCSG requires the construction of a gas pipeline to connect with either the existing Moomba-Sydney pipeline or the mooted Queensland-Hunter pipeline)</p>

Reasons for Approval	Snowy 2.0 Notice of Decision	Narrabri Coal Seam Gas Assessment Report
<p>7. Designed to minimise any environmental impacts</p>	<p><i>“the project has been designed to minimise any impacts on the KNP, including reducing the footprint of the project to less than 0.09% of the KNP during construction and 0.014% during operations”</i></p> <p>(Ed: S2.0 is the first major industrial development to be approved within a National Park. The footprint of S2.0 will be considerably greater than 0.014% of KNP (92 ha). NPA estimates that approximately 10,000 ha (100 square kilometres) will be permanently impacted, plus the waterways of the Snowy Mountains and downstream rivers, due to the spread of pest fish and pathogens)</p>	<ul style="list-style-type: none"> • <i>“has been designed to minimise any impacts on the region's significant water resources, including the Great Artesian Basin, the biodiversity and heritage values of the Pilliga State Forest, and the health and safety of the local community</i> • <i>would comply with the relevant requirements and standards in government legislation, policies and guidelines</i> • <i>would not result in any significant impacts on people or the environment”</i> <p>(Ed: Experts dispute claims of minimal impact, especially on the Great Artesian Basin and the Pilliga Forest)</p>
<p>8. Residual impacts ‘can be reduced to an acceptable level’</p>	<p><i>“the residual impacts of the project can be reduced to an acceptable level by requiring Snowy Hydro to rehabilitate the site to a high standard following construction and to contribute at least \$85.8 million (on top of the \$13.46 million already paid) to fund actions to enhance the KNP and address any remaining risks”</i></p> <p>(Ed: S2.0 residual impacts are unprecedented and cannot be reduced to ‘an acceptable level’. The offset payment is miniscule compared to the project cost of \$10 billion)</p>	<p><i>“any residual impacts of the project can be reduced to an acceptable level by capping total water extraction to 37.5 gigalitres (GL) over the life of the project and requiring Santos to comply with strict standards, rehabilitate the site to a high standard and offset the biodiversity impacts of the project</i></p> <p><i>The Department has recommended a comprehensive suite of strict conditions, which have been developed in consultation with key government agencies and independent experts, to ensure this occurs”</i></p>
<p>The project is ‘in the public interest’ and is approved subject to strict conditions</p>	<p><i>“weighing all relevant considerations, the project is in the public interest”</i></p> <p>(Ed: S2.0 is ‘in the public interest’, despite its exorbitant cost, being more inefficient than any other energy storage, incurring millions of tonnes of CO2e emissions, increasing electricity prices and devastating vast areas of Kosciuszko National Park and downstream rivers, even when there are superior alternatives)</p>	<p><i>“Based on this assessment, the Department considers the project is in the public interest and is approvable subject to strict conditions”</i></p>