

Snowy 2.0 Main Works Modification 4 – Southern Communication Line

Application Number: **03363**

Commencement Date:

Status: **Locked**

04/03/2026

1. About the project

1.1 Project details

1.1.1 Project title *

Snowy 2.0 Main Works Modification 4 – Southern Communication Line

1.1.2 Project industry type *

Commonwealth Development

1.1.3 Project industry sub-type

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1.1.4 Estimated start date *

01/05/2026

1.1.4 Estimated end date *

01/05/2027

1.2 Proposed Action details

1.2.1 Provide an overview of the proposed action, including all proposed activities. *

Snowy Hydro Limited (Snowy Hydro) is developing the Snowy 2.0 Project, comprising a pumped hydro-electric expansion of the existing Snowy Scheme that would link the existing Tantangara and Talbingo reservoirs through 27 km of underground tunnels and an underground hydro-electric power station. Snowy 2.0 is situated within the Snowy Valleys and Snowy Monaro Regional local government areas (LGAs). The nearest large towns to Snowy 2.0 are Cooma, approximately 50 km south-east, and Tumut, which is approximately 35 km north-west. Other nearby towns include Talbingo, Cabramurra, Adaminaby and Tumbarumba.

In March 2018, Snowy 2.0 was declared to be State Significant Infrastructure (SSI) and Critical State Significant Infrastructure (CSSI) in accordance with the provisions of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act).

Snowy 2.0 is being developed in the following stages:

- The Exploratory Works Project, which involves the construction of an approximately 3 km long exploratory tunnel and portal and undertaking other exploratory and construction activities primarily in the Lobs Hole area of Kosciuszko National Park. The NSW Minister of Planning approved the Exploratory Works Project (SSI-9208) on 7 February 2019. On 10 July 2018, it was determined that no assessment was required for the Exploratory Works Project under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) (EPBC 2018/8217).
- The Main Works Project, which involves the construction and operation of Snowy 2.0 to increase the pumped hydro-electric capacity within the Snowy Scheme by linking the Tantangara and Talbingo reservoirs with tunnels feeding a new underground power station. Water would be pumped to the upper dam (Tantangara) when there is a surplus of renewable energy, then released back to the lower dam (Talbingo) when electricity demand is high. The NSW Minister of Planning approved the Mains Works Project (SSI-9687) on 20 May 2020. Since then, the Main Works Project (SSI-9687) approval has been modified on three occasions; being January 2022, November 2023 and December 2024. Approval for the Main Works Project (EPBC 2018/8322) under the EPBC Act was granted in June 2020.

The Main Works Project includes an approved route for the Southern Communications Line (SCL) which is a critical communications line commencing at Tantangara Reservoir, following along Tantangara Road towards Wares Campground (east) after crossing Nungar Creek, then intersecting the Snowy Mountains Highway and ending at Cabramurra. The approved route is approximately 43 km long and includes approximately 2 km of underbore works at Boggy Plain Creek (refer to Figure 1 in Attachment 1).

Snowy Hydro is proposing to relocate a section of the approved SCL route (i.e. eastern alignment of approximately 35 km) to commence at Marica, following Wallace Creek Fire Trail in a southerly direction to Link Road, where it would move east to meet the approved SCL route at Kings Cross Road. The altered alignment would then run south along Kings Cross Road to Selwyn Snow Resort carpark where it would meet the approved SCL route to end at Cabramurra (refer to Figure 1 in Attachment 1).

The Proposed Action would involve the installation of a fibre optic cable along a newly proposed route of approximately 16 km, as shown on Figure 1 in Attachment 1, to replace approximately 35 km of the approved SCL route. The newly proposed route for the Proposed Action would include:

- Approximately 11 km along Wallaces Creek Trail from Marica to Three Mile Dam
- Approximately 1.5 km from Wallaces Creek Trail to Link Road, following west of Three Mile Dam
- Approximately 1.5 km along Link Road to meet up with Kings Cross Road
- Approximately 2 km along Kings Cross Road to Selwyn Snow Resort carpark (note that this length is adjacent to the approved SCL route)

The Proposed Action Area is approximately 19 km shorter than the approved SCL route.

The Proposed Action Area covers an area of approximately 47 ha (refer to Figure 2 in Attachment 1). The final construction footprint (the area of direct disturbance) required for the Proposed Action would be smaller than this and is estimated to be approximately 16 ha, within the Proposed Action Area. The design, final placement of infrastructure and final construction footprint are subject to ongoing environmental assessment and consultation with State government agencies. It is planned that only the area required for construction of the Proposed Action would be disturbed and hence if offsets were identified as being required as part of any determination, only the offsets from the impacts of the final construction footprint would be required.

The Proposed Action Area includes parcels of land owned by NSW National Parks and Wildlife Services (NPWS). A schedule of lands for the Proposed Action Area is provided in Attachment 2.

Construction methodology for the Proposed Action includes a combination of open trenching and horizontal directional drilling (HDD). Open trenching would occur at a depth of approximately 1,200 mm, with backfilling of the trench with clean bedding sand and excavated material. In certain locations, HDD would be implemented where standard open cut trenching methods are less desirable. These include road crossings, areas at risk of groundwater incursion (such as wet areas or alpine bogs and fens) or in highly sensitive and constraint areas. HDD would involve directional drilling at depths of 700 mm to 1200 mm for up to 300 m lengths, reducing the risk of dewatering nearby surface water features and shallow groundwater systems. The exact locations of HDD are yet to be determined based on the outcomes of ongoing environmental assessment and consultation with State government agencies. Construction methodology may change during construction to avoid impacts to sensitive landscapes.

The Proposed Action described in this Referral is still undergoing detailed environmental assessment, which will be documented in a Modification Report to be submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI). It is anticipated that the design, including a detailed project description and updated environmental assessment (involving biodiversity, Aboriginal cultural heritage, historical heritage, water resources and geo-heritage) would be incorporated in the Modification Report for the Proposed Action. Early consultation with DCCEE identified that an accredited assessment process would be sought for the Proposed Action under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act.

1.2.2 Is the project action part of a staged development or related to other actions or proposals in the region?

Yes

1.2.3 Is the proposed action the first stage of a staged development (or a larger project)?

No

1.2.4 Related referral(s)

EPBC Number	Project Title
2018/8217	Snowy 2.0 Exploratory works, Snowy Mountains, NSW
2018/8322	Snowy 2.0 Main Works, Snowy Mountains, NSW
2019/8481	Snowy 2.0 Segment Factory, Polo Flat, NSW
2018/8363	Snowy 2.0 transmission connection project, NSW

1.2.5 Provide information about the staged development (or relevant larger project).

Refer to response to question 1.2.1

1.2.6 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed action, and how are they relevant? *

Environment Protection and Biodiversity Conservation Act 1999:

- EPBC 2018/8322 approval for the Main Works Project associated with Snowy Hydro 2.0
- Additional referrals made by Snowy Hydro include EPBC 2018/8217, EPBC 2019/8481 and EPBC 2018/8363
- The current Proposed Action has potential to impact upon matters of national environmental significance and the whole of environment (as an Action undertaken by a Commonwealth agency)

NSW Environmental Planning and Assessment Act 1979 (EP&A Act):

- Snowy Hydro 2.0 declared State significant infrastructure (SSI) and critical State significant infrastructure (CSSI) under the EP&A Act
- The Main Works Project (SSI-9687) involves the construction and operation of Snowy Hydro 2.0.
- Three modifications (CSSI-9687-Mod 1, CSSI-9687-Mod 2 and CSSI-9687-Mod 3) have already been granted for Main Works Project (SSI-9687).

A fourth modification of the Main Works Project (SSI-9687) is being sought for this Proposed Action.

A Modification Report will be prepared for the proposed modification of the Main Works Project (SSI-9687) providing an environmental assessment of the potential impacts associated with the Proposed Action. The Modification Report will be informed by a Biodiversity Development Assessment Report (BDAR) completed in accordance with the NSW Biodiversity Assessment Method (BAM), an Aboriginal Cultural Heritage Impact Assessment, Historical Heritage Impact Assessment, Water Resources Impact Assessment and Geo-heritage Assessment. The proposed modification of SSI-9687 will be sought under Division 5.2 of the EP&A Act (section 5.25), and as discussed in section 1.21. SHL submits that this should be the applicable accredited assessment process determined under section 87 of the EPBC Act.

1.2.7 Describe any public consultation that has been, is being or will be undertaken regarding the project area, including with Indigenous stakeholders. Attach any completed consultation documentations, if relevant. *

Consultation for the Proposed Action as part of the environmental assessment has commenced and is ongoing. This has involved:

- A program of engagement with the Registered Aboriginal Parties (RAPs) for the Proposed Action undertaken as part of the Aboriginal Cultural Heritage Assessment (AHCA). To date, this has included RAP attendance and involvement during the site survey. Ongoing engagement will involve review and comment on the draft ACHA.
- Ongoing consultation with regulators including both Commonwealth DCCEE and NSW DCCEE, NPWS, DPHI and the EPA regarding assessment requirements and considerations for the Proposed Action.

Prior to determination of the NSW modification application, DPHI will conduct further consultation with key government agencies and stakeholders via the Modification Report public exhibition phase and subsequent assessment and approval process.

1.3.1 Identity: Referring party

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1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details

ABN/ACN 18059519041
Organisation name UMWELT (AUSTRALIA) PTY. LTD.
Organisation address 2284 NSW

Referring party details

Name Alexander Garrett
Job title Senior Environmental Scientist
Phone +61449253999
Email alexander.garrett@umwelt.com.au
Address Unit 3 2/6 Shea St, Phillip ACT 2606

1.3.2 Identity: Person proposing to take the action

1.3.2.1 Are the Person proposing to take the action details the same as the Referring party details? *

No

1.3.2.2 Is Person proposing to take the action an organisation or business? *

Yes

Person proposing to take the action organisation details

ABN/ACN 17090574431
Organisation name SNOWY HYDRO LIMITED
Organisation address 2630 NSW

Person proposing to take the action details

Name Lisa McKeown
Job title General Manager Health Safety and Environment - Snowy 2
Phone 02 6453 2888
Email s2.0centralhse@snowyhydro.com.au
Address PO Box 332, Cooma NSW 2630

1.3.2.14 Are you proposing the action as part of a Joint Venture? *

No

1.3.2.15 Are you proposing the action as part of a Trust? *

No

1.3.2.17 Describe the Person proposing the action's history of responsible environmental management including details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the Person proposing to take the action. *

Snowy Hydro Limited (Snowy Hydro) was fined in September 2008 for causing water pollution to the Snowy River contrary to s120(1) of the *Protection of the Environment Operations Act 1997* (NSW). This resulted from an incident during works to upgrade the Jindabyne Dam spillway in 2006. Snowy Hydro was prosecuted as occupier of the site, and its principal contractor, Fulton Hogan, who carried out the works which introduced the pollutants to the river, was also convicted for the same offence (*Environment Protection Authority v Fulton Hogan Pty Ltd* [2008] NSWLEC 268).

In March 2023, Snowy Hydro was issued with a \$15,000 penalty notice by the NSW EPA for a water pollution incident which occurred as part of the Snowy 2.0 project when sediment laden water entered Nungar Creek on 27 September 2022. The penalty notice was paid by Snowy Hydro which finalised the matter.

In April 2025 Snowy Hydro was issued two infringement notices by DCCEEW (Cwth) relating to the timeliness of incident reporting for an event on the Snowy 2.0 Main Works approval (EPBC 2018/8322). This was later revised to a single \$18,780 infringement in June 2025. Condition 34 of the approval was breached.

In June 2025, Snowy Hydro entered into an enforceable undertaking to pay \$400,000 for a 2023 incident involving the discharge of high-nitrate wash water as part of the Snowy 2.0 project. The enforceable undertaking is committed to supporting the protection of northern corroboree frog.

In November 2025, Snowy Hydro was issued two \$30,000 penalty notices after sediment laden water entered Talbingo Reservoir and the Yarrangobilly River in separate incidents in May and July 2025 related to the Snowy 2.0 project. One notice was issued for polluting waters during the May incident, and the second related to failing to maintain a dirty water drain in the July incident.

In December 2025, Snowy Hydro entered into an enforceable undertaking with DPHI (NSW) to pay DCCEEW (NSW) \$180,000 and provide in-kind support for the conduct of ecological surveys for Leadbeater's possum. The undertaking resulted from non-compliances identified during the fifth independent environmental audit of the Snowy 2.0 Main Works project.

In April 2026, EPA (NSW) issued Snowy Hydro a \$45,000 penalty infringement notice. This resulted from a September 2025 incident where acidic water, reused for dust suppression and irrigation on haul roads and batters, breached the Snowy 2.0 Environmental Protection Licence.

In April 2026, DCCEEW (Cwth) issued Snowy Hydro with two \$19,800 infringement notices relating to delays in reporting events under the Snowy 2.0 Main Works approval (EPBC 2018/8322). Conditions 34 and 35 of the approval were breached.

Prior to these incidents, Snowy Hydro had no convictions and has not had any convictions for environmental offences since. Snowy Hydro is a good corporate citizen that holds the safety of its people, protection of the environment and contribution to the community as its guiding principles. It is currently the licensee for a number of EPLs and has a sound environmental compliance track record with respect to these. We submit that these convictions should not be a reason to deny that Snowy Hydro is a fit and proper person to hold the proposed EPL.

1.3.2.18 If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework

Snowy Hydro's Environmental Policy is available on Snowy Hydro's website (See Link #1 Snowy Hydro Environment Policy)

Snowy Hydro's FY25 Annual Report is available on Snowy Hydro's website (See Link #2 Annual Report for the Financial Year ended 30 June 2025)

The report Annual Report provides an overview of Snowy Hydro's business activities and outlines financial, environmental, social and governance performance for the financial year ended 30 June 2025 (FY25).

It provides an overview of Snowy Hydro's sustainability focus and identifies the nine material topics that guide Snowy's sustainability strategy.

The Snowy 2.0 Project operates under an approved Main Works Environmental Management Strategy (EMS) which provides the planning and environmental framework for the Snowy 2.0 Project.

The EMS is available on Snowy Hydro's website (See Link #3 Main Works Environmental Management Strategy)

1.3.3 Identity: Proposed designated proponent

1.3.3.1 Are the Proposed designated proponent details the same as the Person proposing to take the action? *

Yes

Proposed designated proponent organisation details

ABN/ACN 17090574431
Organisation name SNOWY HYDRO LIMITED
Organisation address 2630 NSW

Proposed designated proponent details

Name Lisa McKeown
Job title General Manager Health Safety and Environment - Snowy 2
Phone 02 6453 2888
Email s2.0centralhse@snowyhydro.com.au
Address PO Box 332, Cooma NSW 2630

1.3.4 Identity: Summary of allocation

✔ Confirmed Referring party's identity

The Referring party is the person preparing the information in this referral.

ABN/ACN	18059519041
Organisation name	UMWELT (AUSTRALIA) PTY. LTD.
Organisation address	2284 NSW
Representative's name	Alexander Garrett
Representative's job title	Senior Environmental Scientist
Phone	+61449253999
Email	alexander.garrett@umwelt.com.au
Address	Unit 3 2/6 Shea St, Phillip ACT 2606

✔ Confirmed Person proposing to take the action's identity

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	17090574431
Organisation name	SNOWY HYDRO LIMITED
Organisation address	2630 NSW
Representative's name	Lisa McKeown
Representative's job title	General Manager Health Safety and Environment - Snowy 2
Phone	02 6453 2888
Email	s2.0centralhse@snowyhydro.com.au
Address	PO Box 332, Cooma NSW 2630

✔ Confirmed Proposed designated proponent's identity

The Person proposing to take the action is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

1.4 Payment details: Payment exemption and fee waiver

1.4.1 Do you qualify for an exemption from fees under EPBC Regulation 5.23 (1) (a)? *

No

1.4.3 Have you applied for or been granted a waiver for full or partial fees under Regulation 5.21A? *

No

1.4.5 Are you going to apply for a waiver of full or partial fees under EPBC Regulation 5.21A?

No

1.4.7 Has the department issued you with a credit note? *

No

1.4.9 Would you like to add a purchase order number to your invoice? *

No

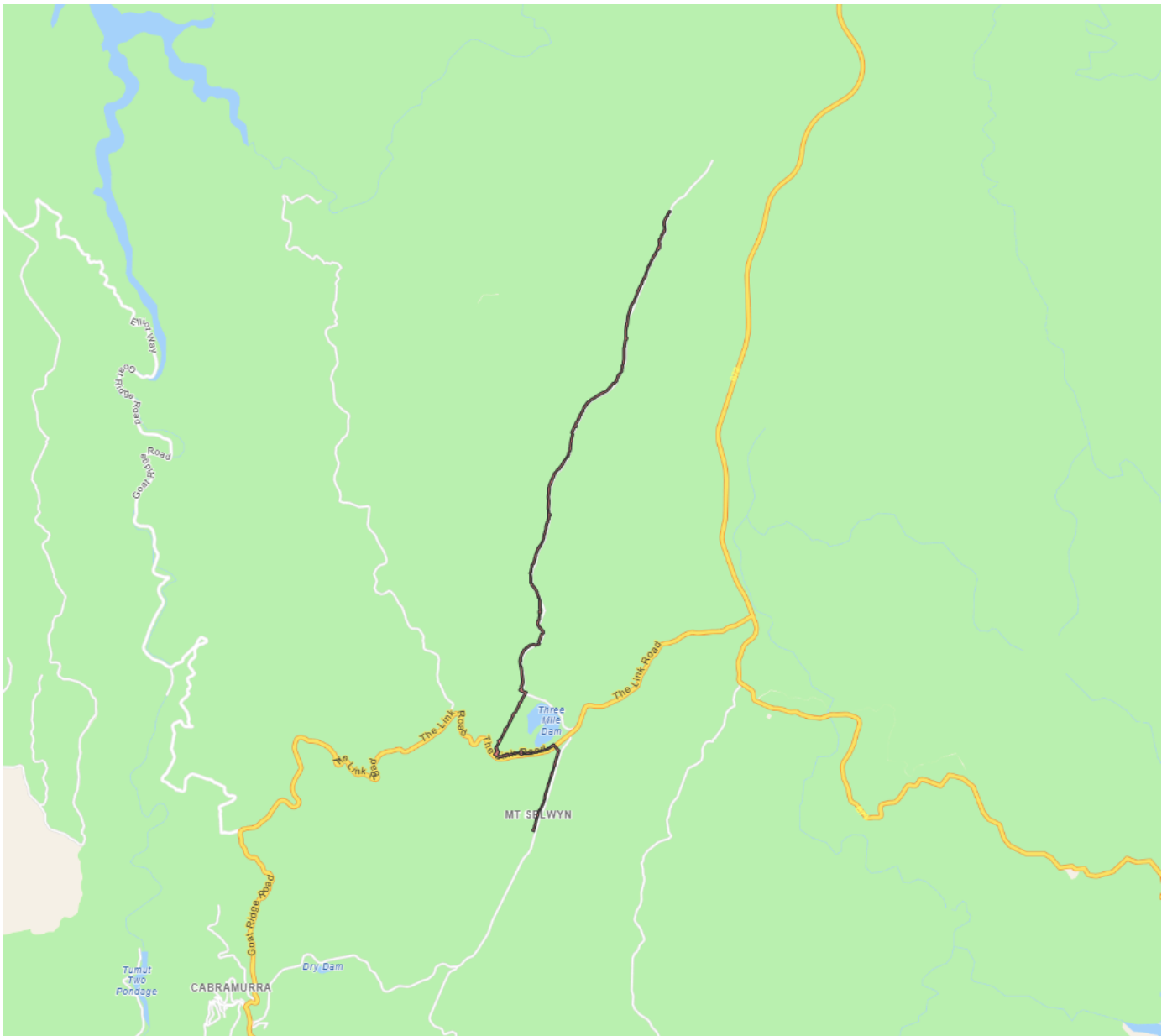
1.4 Payment details: Payment allocation

1.4.11 Who would you like to allocate as the entity responsible for payment? *

Person proposing to take the action

2. Location

2.1 Project footprint



Project Area: 15.88 Ha Disturbance Footprint: 15.88 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

Link Road, Kiandra, NSW 2629

2.2.2 Where is the primary jurisdiction of the proposed action? *

New South Wales

2.2.3 Is there a secondary jurisdiction for this proposed action? *

No

2.2.5 What is the tenure of the action area relevant to the project area? *

The Proposed Action Area traverses across nine land parcels, as detailed in 'Attachment 2 – Schedule of lands.pdf', page 1. The entirety of the Proposed Action Area is located within land that is held by the NSW Government as part of the NSW National Parks and Wildlife Service (NPWS) Estate. Refer 'Attachment 1 – Figures.pdf', Page 5. Land ownership of the Proposed Action Area is therefore held by NPWS.

3. Existing environment

3.1 Physical description

3.1.1 Describe the current condition of the project area's environment.

The Proposed Action Area is located wholly within the Kosciuszko National Park and falls within both the Snowy Valleys and Snowy Monaro Regional local government areas (LGA). Refer 'Attachment 1 – Figures.pdf', Page 1.

The alignment of the Proposed Action traverses across a range of land use types such as fire trails, road reserves and transmission line easement. The majority of the Proposed Action Area consists of remnant native vegetation that has had past tree removal, slashing or other disturbance associated with the above listed land uses. Native vegetation in the Proposed Action Area is generally disturbed compared to the relatively intact native vegetation that occurs along the edges of the Proposed Action Area. The disturbed vegetation occurs in the form of woodlands, forests, shrublands, herbfields, bogs and fens that occur in varying conditions as a result of differing interactions with land uses. Further to this, much of the woodlands and forests vegetation remains in a state of recovery from the previous catastrophic bushfires that burned extensive areas in the locality in 2020. There is evidence of regular occupation and impacts to the vegetation from feral horses within segments of the Proposed Action Area.

Native communities include typical alpine and subalpine environments with a mix of woodland, bog, heath and grassland systems. A list of preliminary PCTs identified in the Proposed Action Area are listed below:

- 3380 Jounama Snow Gum Shrub Woodland
- 3381 Kosciuszko Alpine Sally Woodland
- 3383 Kosciuszko Subalpine Hollows Black Sally Woodland
- 3878 Kosciuszko Frost Hollow Grassy Open Heath
- 3880 Namadgi Subalpine Rocky Shrubland
- 3886 Kosciuszko Frost Hollow Grassland
- 3891 Kosciuszko Range Boggy Herbfield.

3.1.2 Describe any existing or proposed uses for the project area.

Existing uses for the Proposed Action Area include:

- Wallaces Creek Trail (for recreational hikes and to provide bushfire mitigation access)
- A Transgrid transmission line easement (for support of existing electricity infrastructure)
- Existing road reserves (Link Road and Kings Cross Road).

The infrastructure to be installed as part of the Proposed Action would consist of underground fibre optic cable. Maintenance trails would be established where access trails do not already exist along the route for the Proposed Action, noting that the majority of the Proposed Action Area is already accessible by existing trails, road reserves and a transmission line easement.

Other than the installation of maintenance trails, there would be no long-term change to existing land uses within the Proposed Action Area.

3.1.3 Describe any outstanding natural features and/or any other important or unique values that applies to the project area.

The Proposed Action Area is located within Kosciuszko National Park, and is within one National Heritage Place listed for its Natural heritage values, being:

- Australian Alps National Parks and Reserves (National Heritage Place ID: 105891).

Based on the Protected Matters Search Tool (PMST), there are a total of 2 threatened ecological communities, 39 threatened species, and 8 migratory species which have potential to occur within the Proposed Action Area. This reflects the high biodiversity and high conservation value of the land.

Vegetation, targeted flora and fauna surveys remain ongoing until late March 2026. To date, the following MNES values have been identified on site:

- Alpine Sphagnum bogs and associated fens threatened ecological community (endangered) (confirmed)
- *Leucochrysum albicans* var. *tricolor* (endangered) (confirmed)
- *Pimelea bracteata* (critically endangered) (potential)
- *Litoria verreauxii alpina* (alpine tree frog) (vulnerable) (confirmed).

In addition to the MNES listed above that have been confirmed to occur in the Proposed Action Area, the following MNES have also been assumed to be present as a result of suitable habitat being present and multiple records occurring in the locality:

- *Mastacomys fuscus mordicus* (broad-toothed rat) (endangered)
- *Prasophyllum bagoense* (Bago leek-orchid) (critically endangered).

3.1.4 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

The Proposed Action Area runs along a ridgeline between the Murrumbidgee catchment to the west and the Snowy River catchment to the east. Topography consists of a deeply incised ravine to the west, with a slope of 35 per cent. Undulating hilly terrain is present to the east.

Elevation along the Proposed Action Area ranges from 1,452 m Australian Height Datum (mAHD) in the south to 1,563 mAHD in the north

3.2 Flora and fauna

3.2.1 Describe the flora and fauna within the affected area and attach any investigations of surveys if applicable.

The preliminary biodiversity surveys within the Proposed Action Area indicate that the following seven Plant Community Types (PCTs) are present:

- 3380 Jounama Snow Gum Shrub Woodland
- 3381 Kosciuszko Alpine Sally Woodland
- 3383 Kosciuszko Subalpine Hollows Black Sally Woodland
- 3878 Kosciuszko Frost Hollow Grassy Open Heath
- 3880 Namadgi Subalpine Rocky Shrubland
- 3886 Kosciuszko Frost Hollow Grassland
- 3891 Kosciuszko Range Boggy Herbfield

Of the seven PCTs believed to occur, the most dominant in terms of area are 3381, 3380 and 3383. It is expected that the majority of PCTs recorded will only support a single vegetation condition zone, while some PCTs could support two vegetation condition zones (e.g. Moderate Good and Low Condition).

The Alpine *Sphagnum* bogs and associated fens threatened ecological community (endangered) has been confirmed within the Proposed Action Area.

Targeted flora and fauna surveys remain ongoing until late March 2026. To date, the following MNES species have been identified on site:

- *Leucochrysum albicans* var. *tricolor* (endangered) (confirmed)
- *Pimelea bracteata* (critically endangered) (potential)
- *Litoria verreauxii alpina* (alpine tree frog) (vulnerable) (confirmed).

It is noted that ecological survey of the Proposed Action Area is ongoing. As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that the Proposed Action would be assessed under the accredited assessment process under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable DPHI to manage the assessment of this Proposed Action, including the issuing of the assessment requirements for the modification application.

3.2.2 Describe the vegetation (including the status of native vegetation and soil) within the project area.

The majority of the Proposed Action Area consists of remnant native vegetation that has had past tree removal, slashing or other disturbance. Native vegetation occurring within the Proposed Action Area is generally disturbed compared to the relatively intact native vegetation that occurs along the edges of the Proposed Action footprint. The disturbed vegetation occurs in the form of woodlands, forests, shrublands, herbfields, bogs and fens that occur in varying conditions as a result of differing interactions with land uses. Further to this, much of the woodlands and forests vegetation remains in a state of recovery from the previous catastrophic bushfires that burned extensive areas in the locality in 2020. Vegetation surveys remain ongoing. To date, the following MNES TECs have been identified on site:

- Alpine *Sphagnum* bogs and associated fens threatened ecological community (endangered) (confirmed).

It is noted that ecological survey of the Proposed Action Area is ongoing. As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that the Proposed Action would be assessed under the accredited assessment process under section 87 of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable DPHI to manage the assessment of this Proposed Action, including the issuing of the assessment requirements for the modification application.

3.3 Heritage

3.3.1 Describe any Commonwealth Heritage Places Overseas or other places recognised as having heritage values that apply to the project area.

The Proposed Action Area is located within two National Heritage Places, namely the Snowy Mountains Scheme (Place ID: 105919) and the Australian Alps National Parks and Reserves (place ID: 105891). The following information has been summarised from the Australian Heritage Database for the two relevant National Heritage Places

Snowy Mountains Scheme

The Snowy Mountains Scheme (the scheme) is a historically significant dual-purpose hydro-electric and irrigation development that collects and stores water that formerly flowed east to the coast and diverts water through trans-mountain tunnels and power stations to release in to the Murray and Murrumbidgee River to provide water for irrigation to the west of the Great Dividing Range.

The Snowy Mountains Scheme National Heritage place includes: 15 large dams; 80 kilometres of aqueduct pipelines; 13 major tunnels covering more than 145 kilometres in all; 7 power stations, two of them deep underground, and 8 switching stations and control centres (Pearson & Marshall 2001). Additionally, the Scheme was supported by three towns- Khancoban, Cabramurra and Talbingo, and an additional 120 work camps and former construction towns were developed.

Constructed over a 25 year period (1949 – 1974) the Scheme is nationally significant as the largest public works engineering scheme undertaken in Australia and is nationally significant for its engineering success and as a defining project that changed the pre-war workplace practices and industrial relations environment.

The Scheme is recognised for its exceptional technical innovation, design excellence and its role in transforming Australia's energy production and agricultural water security. It is equally valued for its profound social significance: more than 100,000 workers from over 30 nations contributed to its construction, with a large proportion being post-war migrants whose participation helped shape modern multicultural Australia.

Australian Alps National Parks and Reserves

The Australian Alps National Parks and Reserves (AANPR), spanning 1.6 million hectares across New South Wales, Victoria and the ACT, are nationally significant for historical, natural and indigenous heritage values.

The summary statement of significance for the AANPR identifies several historical heritage values attributed to the AALNPR at a national level, a selection of these values is outlined below however is not an exhaustive list of the historical heritage values of the site.

The Australian Alps National Parks and Reserves (AANP) are part of a unique Australian mountainous bioregion extending over New South Wales, the Australian Capital Territory and Victoria. The AANP displays a mosaic of interactions between its natural and cultural environments.

Transhumant grazing commenced in the 1830s and was the practice of using alpine high plains to graze stock during the summer months. It was a significant pastoral activity of the 19th and 20th centuries, continuously practised for over 150 years that made a considerable contribution to Australia's pastoral industry. Transhumant grazing created and sustained a distinctive way of life that is valued as an important part of Australia's pioneering history and culture. As a relict landscape of past grazing leases it conveys the principal characteristics of transhumance and permanent pastoralism being the large areas of open grassy landscapes between timbered ridges and hills, stockman's huts, homestead complexes, stockyards and stock routes.

Scientific research has been undertaken in the AANP since the 1830s. The value is demonstrated by the density and continuity of scientific endeavour. Research sites extending throughout the Alps relate to botanical surveys, soil conservation enclosures, karst research sites, fire ecology plots, arboreta, glacial research sites and space tracking.

Snow-based recreation in the AANP commenced in Kiandra in 1861 with the establishment of the Kiandra Snowshoe Club and expanded from an ad hoc activity by enthusiasts to a multi-million dollar snow sport and tourism industry, today with substantial ski slopes and village resorts. The government hotels established in scenic locations - the Mount Buffalo Chalet, the Yarrangobilly Caves House and Precinct, the Chalet at Charlottes Pass, the Hotel Kosciuszko (former) and Mount Franklin Chalet (former) were major features of the expanding activity in the early twentieth century.

Water harvesting in the AANP has contributed to the social and economic development of Australia. Elements of the Snowy Mountains Hydro-electric Scheme and the Kiewa Valley Hydro-electric Scheme occur within the AANP and contribute to the electricity needs of south-eastern Australia, evident in the major pondages along with the numerous tunnels, aqueducts, power stations, huts, roads and former settlements, town and work camp sites

The AANP is a powerful, spectacular and distinctive landscape and is highly valued by the Australian community for its aesthetic vistas and experiences. The distinctive mountain landscapes of the AANP have been captured by numerous artists and photographers, inspiring poets, writers, musicians and film makers. The AANP has a special association with the Australian community because of its unique landscapes, the experiences of remoteness and naturalness and as the only opportunity for broad-scale snow recreation in Australia. The AANP is widely recognised by Australians as the 'high country'.

Mount Kosciuszko is an iconic feature for all Australians and visited by over 100,000 people each year. The mountain was named by the explorer Paul Edmund Strzelecki after the Polish freedom fighter, General Tadeusz Kosciuszko in appreciation of freedom and a free people, an association that is passionately valued and celebrated by Australia's Polish community.

The Indigenous heritage values of the AANP are discussed in Section 3.3.2 below.

Previous assessment for the Project

It is recognised that the broader area associated with the Snowy 2.0 Main Works Project has been subject to extensive historic heritage assessment as part of the EIS and subsequent approvals for the Snowy 2.0 Main Works Project. This The key historical assessment for the Project the Snowy 2.0 Main Works Heritage Assessment and Statement of Heritage Impact prepared in 2019 by New South Wales Archaeology. This assessment included a summary of the listed heritage items within the Snowy 2.0 Main Works Project footprint, as well as pedestrian survey to identify potentially significant historical structures, features or other elements in the landscape that were not previously identified on statutory heritage registers.

The Proposed Action is partially located within the footprint surveyed for heritage values as part of the Snowy 2.0 Main Works, with some historical items identified within the vicinity (50m) of the Wallace's Creek Fire Trail and the Proposed Action Area.

Heritage survey and a detailed historical heritage assessment of the Proposed Action Area, not previously subject to survey, is ongoing. In addition, a Geo-heritage Assessment is also being undertaken for the Proposed Action. As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that the Proposed Action would be assessed under the accredited assessment process under section 87 of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable DPHI to manage the assessment of this Proposed Action, including the issuing of the assessment requirements for the modification application.

3.3.2 Describe any Indigenous heritage values that apply to the project area.

Aboriginal and Torres Strait Islander heritage is an important part of Australian heritage. As well as being historically important, Indigenous heritage is of continuing significance, creating and maintaining continuous links with the people and the land.

The Proposed Action Area is located within Kosciuszko National Park, a landscape of long-established cultural significance to indigenous peoples. In particular, deep cultural roots are associated with:

- Traditional seasonal movements into the high country for resource harvesting (including Bogong moth gatherings).
- Long-term occupation and use, supported by archaeological evidence throughout the Alps.
- A strong continuing spiritual and cultural relationship between indigenous communities and alpine landscapes.

Since the Proposed Action Area largely traverses native alpine and subalpine environments, with ridgelines and other landforms known to contain indigenous objects elsewhere in the region, there remains:

- Potential for tangible heritage, including stone artefacts or culturally significant landforms.
- Potential for intangible values, such as songlines, spiritual associations, or traditional pathways.
- A possibility of previously unrecorded sites, in areas that were not previously been surveyed for the Snowy 2.0 Main Works.

Indigenous heritage survey was completed in December 2025, with the processing of associated data and assessment of potential impacts still ongoing. As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that the Proposed Action would be assessed under the accredited assessment process under section 87 of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable DPHI to manage the assessment of this Proposed Action, including the issuing of the assessment requirements for the modification application.

3.4 Hydrology

3.4.1 Describe the hydrology characteristics that apply to the project area and attach any hydrological investigations or surveys if applicable. *

The project alignment runs along a major ridgeline separating two significant river systems:

- Murrumbidgee River catchment to the west
- Snowy River catchment to the east.

Runoff would typically flow east and/or west of the Proposed Action Area into these catchments. Due to its position along the catchment boundary, there are no notable rivers or creeks crossing the Proposed Action Area in the northern section. In the southernmost section of the Proposed Action Area, the SCL route crosses Three Mile Creek and the southern extent of Three Mile Dam (refer 'Attachment 1 - Figures.pdf', Page 1 to 3).

Detailed groundwater investigations have yet to be completed. However, alpine regions often contain thin soils with small, discontinuous perched groundwater zones that respond directly to snowmelt and rainfall. Groundwater-surface water interactions at the Proposed Action Area are likely to occur through seepage into headwater drainage lines, discharge into alpine bogs and fens, and through lateral movement through subsurface rock layers.

It is noted that detailed hydrological investigations for the Proposed Action Area are ongoing. As discussed in Section 1.2.1 of this Referral, Early consultation with DCCEE identified that the Proposed Action would be assessed under the accredited assessment process under section 87 of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable DPHI to manage the assessment of this Proposed Action, including the issuing of the assessment requirements for the modification application.

4. Impacts and mitigation

4.1 Impact details

Potential Matters of National Environmental Significance (MNES) relevant to your proposed action area.

EPBC Act section	Controlling provision	Impacted	Reviewed
S12	World Heritage	No	Yes
S15B	National Heritage	Yes	Yes
S16	Ramsar Wetland	No	Yes
S18	Threatened Species and Ecological Communities	Yes	Yes
S20	Migratory Species	Yes	Yes
S21	Nuclear	No	Yes
S23	Commonwealth Marine Area	No	Yes
S24B	Great Barrier Reef	No	Yes
S24D	Water resource in relation to large coal mining development or coal seam gas	No	Yes
S26	Commonwealth Land	No	Yes
S27B	Commonwealth Heritage Places Overseas	No	Yes
S28	Commonwealth or Commonwealth Agency	Yes	Yes

4.1.1 World Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.1.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.1.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

There are no World Heritage sites within proximity to the Proposed Action. The nearest World Heritage site is the Greater Blue Mountains Area located approximately 275 km from the Proposed Action.

4.1.2 National Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	National heritage
Yes	Yes	Australian Alps National Parks and Reserves
Yes	Yes	Snowy Mountains Scheme

4.1.2.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.2.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

The Proposed Action would occur within two National Heritage sites, namely the Snowy Mountains Scheme (Place ID: 105919) and the Australian Alps National Parks and Reserves (AANP) (Place ID: 105891).

The Proposed Action would include vegetation clearing, excavation, trenching, horizontal directional drilling, earthworks, vehicle movements and installation of cable infrastructure. These activities would result in temporary impacts including: ground disturbance; removal or modification of vegetation; increased noise and vibration; and increased human presence and vehicle movements within the construction corridor.

The extent of disturbance would be limited to the construction footprint (approximately 16 ha) within the wider Proposed Action Area (approximately 47 ha) (refer to Figure 2 in Attachment 1) assessed within this referral and would generally be linear in nature along the SCL alignment. Any potential impacts on national heritage values would be minor and temporary (during construction phase only), with disturbed areas rehabilitated following the completion of works in accordance with a Rehabilitation Management Plan to be developed by Snowy Hydro and approved by DPHI in consultation with NPWS. Areas not subject to rehabilitation would be limited to the formed alignment of Wallaces Creek Fire Trail, Link Road and Kings Cross Road, and any areas required to support ongoing maintenance of the permanent infrastructure.. Activities would be undertaken subject to a robust management framework that would aim to minimise impacts and limit the potential loss of national heritage values.

Environmental assessment of the Proposed Action commenced in late 2025 and is ongoing. A detailed historical heritage assessment of these National Heritage places is being undertaken in the environmental assessment for the Proposed Action, as part of the approvals process under the NSW EP&A Act.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.1.2.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact?

*

No

4.1.2.6 Describe why you do not consider this to be a Significant Impact. *

Preliminary findings of the Historical Heritage Assessment being undertaken for the Proposed Action indicate that the Proposed Action is unlikely to result in significant impacts to the national heritage values of the AANP (Place ID: 105891) and The Snowy Mountains Scheme (Place ID:105919).

Based on the review of the heritage values of the AANP, the historical heritage values that would most likely be represented in the Proposed Action Area fall under Criterion A and D of the National Heritage List Criteria:

- Criterion A (Events and Process) associated with long term transhuman grazing practices which commenced in the 1830s.
- Criterion D (Principle characteristic of a class of places) including the North-East Kosciuszko Pastoral Landscape, in which the Proposed Action sits overlooking parts of the Three Mile dam and nearby Kiandra landscape with its former pastures and gold fields.

It is not considered likely that the historical sites recorded within the vicinity of the Proposed Action would be considered as contributory features of the AANP, nor tangible evidence of the national heritage values of the AANP as set out in the Australian Heritage Database entry for this national heritage place.

Additionally, although the Proposed Action Area is located within the boundary of the Snowy Mountains Scheme national heritage place, the description of the place does not cover the Proposed Action Area, nor are there any significant elements of the Snowy Mountain Scheme located in or within the vicinity of the Proposed Action Area.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.1.2.7 Do you think your proposed action is a controlled action? *

No

4.1.2.9 Please elaborate why you do not think your proposed action is a controlled action.

*

Preliminary findings indicate that the Proposed Action is unlikely to result in any adverse impacts to the national heritage values of the AANP and The Snowy Mountains Scheme.

Construction of the Proposed Action would involve activities including vegetation clearing, excavation, trenching, horizontal directional drilling, earthworks, vehicle movements and installation of cable infrastructure. However, construction of the Proposed Action would not require extension, renovation or alteration to significant fabric or elements within the AANP or Snowy Mountain Scheme national heritage places. The Proposed Action is not considered to be inconsistent with the heritage values of the two national heritage places.

It is not considered likely that the historical sites recorded within the vicinity of the Proposed Action be considered as contributory features of the AANP, nor tangible evidence of the national heritage values of the AANP as set out in the Australian Heritage Database entry for this national heritage place.

Additionally, although the Proposed Action Area is located within the boundary of the Snowy Mountains Scheme national heritage place, the description of the place does not cover the Proposed Action Area, nor are there any significant elements of the Snowy Mountain Scheme located in or within the vicinity of the Proposed Action.

As such, the Proposed Action is not considered to be a controlled action in regards to potential impact to National Heritage.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.1.2.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

A tiered approach has been adopted to avoid and minimise impacts to MNES. Refer to Attachment 3 for more detail on avoidance and minimisation of impacts during the early design stages of the Proposed Action.

An iterative design approach is currently being applied to the Proposed Action, informed by the outcomes of the environmental assessment and detailed site investigations, as well as ongoing consultation with State government agencies. The outcome of this iterative design process would be detailed in the Modification Report and the associated specialist studies.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including assessment of the avoidance, mitigation, repair and offset measures adopted by the Proposed Action.

4.1.2.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

Offsets for the Proposed Action have not been proposed for impacts to National Heritage values. In accordance with the Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy (DSEWPC 2012), offsets are only required where residual impacts are determined to be significant. As described in Sections 4.1.2.5 and 4.1.2.8, the Proposed Action is not expected to result in significant impacts to the National Heritage values of the Australian Alps National Parks and Reserves or the Snowy Mountains Scheme.

Accordingly, no significant residual impacts to National Heritage values are anticipated, and offsets are not considered necessary for impacts to National Heritage.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including calculating offset requirements for the Proposed Action.

4.1.3 Ramsar Wetland

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Ramsar wetland
No	No	Banrock Station Wetland Complex
No	No	Barmah Forest
No	No	Hattah-Kulkyne Lakes
No	No	NSW Central Murray State Forests
No	No	Riverland
No	No	The Coorong, and Lakes Alexandrina and Albert Wetland

4.1.3.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.3.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

There are seven Ramsar wetlands which have been identified to be within the catchment of the Proposed Action Area:

- Banrock station wetland complex – 700-800 km downstream from the Proposed Action Area
- Barmah forest – 200–300 km downstream from the Proposed Action Area
- Gunbower forest – 300-400 km downstream from the Proposed Action Area
- Hattah-kulkyne lakes – 500-600 km downstream from the Proposed Action Area
- NSW central murray state forests – 200-300 km downstream from the Proposed Action Area
- Riverland – 600-700 km downstream from the Proposed Action Area
- The coorong, and lakes alexandrina and albert wetland – 700-800 km downstream from the Proposed Action Area.

All identified Ramsar wetlands are located at substantial distances from the Proposed Action Area. This distance mitigates the risk of direct or indirect impacts to the Ramsar wetlands from localised hydrological impacts associated with the Proposed Action.

The Proposed Action may result in localised hydrological impacts to local environmental values. However, the Proposed Action does not involve works which are likely to result in large-scale or regional-scale hydrological changes which would affect the wetlands, such as substantial water extraction, water impounding, or works which would result in large-scale hydrological changes such as substantially altered drainage and runoff patterns.

Therefore, given the distance of the Proposed Action to the identified Ramsar wetlands and the likely localised scale nature of hydrological impacts, it is considered unlikely that the Proposed Action would result in direct or indirect impacts to Ramsar wetlands.

4.1.4 Threatened Species and Ecological Communities

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Threatened species

Direct impact	Indirect impact	Species	Common name
Yes	Yes	<i>Leucochrysum albicans</i> subsp. tricolor	Hoary Sunray, Grassland Paper-daisy
Yes	Yes	<i>Litoria verreauxii alpina</i>	Alpine Tree Frog, Verreaux's Alpine Tree Frog
Yes	Yes	<i>Mastacomys fuscus mordicus</i>	Broad-toothed Rat (mainland), Toarrana
Yes	Yes	<i>Pimelea bracteata</i>	
Yes	Yes	<i>Prasophyllum bagoense</i>	Bago Leek-orchid

Ecological communities

Direct impact	Indirect impact	Ecological community
Yes	Yes	Alpine Sphagnum Bogs and Associated Fens

4.1.4.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.4.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

Based on the Protected Matters Search Tool (PMST), there are a total of two threatened ecological communities and 39 threatened species which have potential to occur within the Proposed Action Area. This reflects the high biodiversity and high conservation value of the land.

Vegetation, targeted flora and fauna surveys and detailed biodiversity assessment remain ongoing until April 2026. To date, the following MNES values have been identified on site:

Alpine Sphagnum bogs and associated fens threatened ecological community (endangered) (confirmed)

- *Leucochrysum albicans var. tricolor* (endangered) (confirmed)
- *Pimelea bracteata* (critically endangered) (potential)
- *Litoria verreauxii alpina* (alpine tree frog) (vulnerable) (confirmed).

In addition to the MNES listed above that have been confirmed to occur in the Proposed Action Area, the following MNES have also been assumed to be present as a result of suitable habitat being present and multiple records occurring in the locality:

- *Mastacomys fuscus mordicus* (broad-toothed rat) (endangered)
- *Prasophyllum bagoense* (Bago leek-orchid) (critically endangered).

The construction phase of the Proposed Action would involve activities including vegetation clearing, excavation, trenching, horizontal directional drilling, earthworks, vehicle movements and installation of cable infrastructure. These activities would result in temporary ground disturbance, removal or modification of vegetation, increased noise and vibration, and temporary increases in human presence and vehicle movements within the construction corridor. Construction activities are expected to be undertaken over an approximately 6-month period.

The extent of disturbance would be limited to the construction footprint within the Proposed Action Area (refer to Figure 2 in Attachment 1) assessed within this referral and would generally be linear in nature along the SCL alignment. Impacts would primarily occur during the construction phase and would be temporary, with disturbed areas rehabilitated following completion of works in accordance with a rehabilitation management plan to be approved by DPHI in consultation with NPWS.

The impacts of the Proposed Action on threatened species and ecological communities is subject to ongoing assessment and refinement. Ecological assessment of the Proposed Action commenced in late 2025 and are ongoing through to April 2026. An assessment of threatened species and ecological communities is being undertaken in the BDAR and Modification Report for the Proposed Action, as part of the approvals process under the NSW EP&A Act.

As discussed in Section 1.2.1, the final construction footprint (the area of direct disturbance) required for the Proposed Action would be approximately 16 ha, within the wider Proposed Action Area. Of the 16 ha of direct disturbance, up to 0.67 ha are expected to conform to threatened ecological communities listed under the EPBC Act, being:

- Up to 0.67 ha Alpine Sphagnum bogs and associated fens threatened ecological community (endangered).

The Proposed Action will impact up to 16 ha of potential habitat for threatened species such as:

- *Leucochrysum albicans var. tricolor* (endangered)
- *Pimelea bracteata* (critically endangered)
- *Litoria verreauxii alpina* (alpine tree frog) (vulnerable)
- *Mastacomys fuscus mordicus* (broad-toothed rat) (endangered)
- *Prasophyllum bagoense* (Bago leek-orchid) (critically endangered).

Snowy Hydro has resolved to take a precautionary approach and nominate that the Proposed Action has the potential to have a significant impact on threatened species and ecological communities so that actual

impacts can be assessed and documented within the BDAR and Modification Report.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.1.4.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact?

*

Yes

4.1.4.5 Describe why you consider this to be a Significant Impact. *

The impacts of the Proposed Action on threatened species and ecological communities is subject to ongoing assessment and refinement. Snowy Hydro has resolved to take a precautionary approach and nominate that the Proposed Action has the potential to have a significant impact on threatened species and ecological communities so that actual impacts can be assessed and documented within the BDAR and Modification Report.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.1.4.7 Do you think your proposed action is a controlled action? *

Yes

4.1.4.8 Please elaborate why you think your proposed action is a controlled action. *

The impacts of the Proposed Action on threatened species and ecological communities are subject to ongoing assessment and refinement. Snowy Hydro has resolved to take a precautionary approach and nominate that the Proposed Action has the potential to have a significant impact on threatened species and ecological communities resulting in a controlled action determination so that actual impacts can be assessed and documented within the BDAR and Modification Report. The Proposed Action would involve up to approximately 16 ha of disturbance to habitat for MNES, including habitat for vulnerable, endangered and critically endangered species within Kosciuszko National Park.

Having regard for the scale and construction methodology of the Proposed Action, and the presence of listed threatened species and ecological communities (including Alpine Sphagnum bogs and associated fens) within the Proposed Action Area, the Proposed Action has the potential to result in a significant impact on threatened species and ecological communities. In addition, the Proposed Action is an integral part of the broader Snowy 2.0 Project, and the cumulative impacts of the project contribute to the assessment of significance.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.1.4.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

A tiered approach has been adopted to avoid and minimise impacts to MNES. Refer to Attachment 3 for more detail on avoidance and minimisation of impacts during the early design stages of the Proposed Action.

An iterative design approach is currently being applied to the Proposed Action, informed by the outcomes of the environmental assessment and detailed site investigations, as well as ongoing consultation with State government agencies. The outcome of this iterative design process would be detailed in the Modification Report and the associated specialist studies.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including assessment of the avoidance, mitigation, repair and offset measures adopted by the Proposed Action.

4.1.4.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

Offsets for the Proposed Action have not yet been determined as environmental assessment of MNES remains ongoing. Offsets would be calculated at a later stage as part of the preparation of the BDAR for this Proposed Action and documented in the Modification Report for the Proposed Action.

The Proposed Action forms part of the broader Snowy 2.0 Main Works (CSSI 9687), for which a biodiversity offset framework has already been established (refer to Conditions 12 and 13 of the Infrastructure Approval CSSI 9687). Snowy Hydro Limited has completed four of the five required biodiversity offset payments under the existing approval. The final offset payment is to be calculated based on the confirmed final disturbance area for the Main Works, inclusive of the SCL.

The Proposed Action represents a change to the approved SCL alignment, and the final disturbance area will reflect the revised footprint associated with the alternate alignment presented in this Referral. The final disturbance area will be confirmed prior to completion of construction, and the value of the outstanding biodiversity offset payment will be determined on a proportionate basis in accordance with the applicable approval conditions.

The Modification Report would confirm the final disturbance boundary and the value and timing of the outstanding biodiversity offset payment in accordance with the applicable approval conditions.

It is anticipated that the Proposed Action would result in a reduction of the overall offset liability for the Snowy 2.0 Project. As stated earlier, the potential impacts to MNES associated with the Proposed Action are expected to be less than with the current approved impacts to MNES associated with the SCL route. Reasons for that being that the Proposed Action Area is approximately 19 km shorter than the section of the SCL route that would be removed, and the area through which the Proposed Action would traverse has been specifically located within in already cleared, developed and/or disturbed areas.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including calculating offset requirements for the Proposed Action.

4.1.5 Migratory Species

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Species	Common name
Yes	Yes	<i>Actitis hypoleucos</i>	Common Sandpiper
Yes	Yes	<i>Apus pacificus</i>	Fork-tailed Swift
Yes	Yes	<i>Calidris acuminata</i>	Sharp-tailed Sandpiper
Yes	Yes	<i>Calidris ferruginea</i>	Curlew Sandpiper
Yes	Yes	<i>Calidris melanotos</i>	Pectoral Sandpiper
Yes	Yes	<i>Gallinago hardwickii</i>	Latham's Snipe, Japanese Snipe
Yes	Yes	<i>Hirundapus caudacutus</i>	White-throated Needletail
Yes	Yes	<i>Motacilla flava</i>	Yellow Wagtail

4.1.5.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.5.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

Based on the Protected Matters Search Tool (PMST), there are a total of 8 migratory species which have potential to occur within the Proposed Action Area.

Vegetation, flora and fauna surveys remain ongoing at the time of lodgement of this Referral. Surveys include targeted species surveys, and assessment of habitat features available which may be suitable for migratory species.

The construction phase of the Proposed Action would involve activities including vegetation clearing, excavation, trenching, horizontal directional drilling, earthworks, vehicle movements and installation of cable infrastructure. These activities would result in temporary ground disturbance, removal or modification of vegetation, increased noise and vibration, and temporary increases in human presence and vehicle movements within the construction corridor.

The extent of disturbance would be limited to the construction footprint within the Proposed Action Area (refer to Figure 2 in Attachment 1) assessed within this referral and would generally be linear in nature along the SCL alignment. Impacts would primarily occur during the construction phase and would be temporary, with disturbed areas rehabilitated following the completion of works in accordance with a Rehabilitation Management Plan to be developed by Snowy Hydro and approved by DPHI in consultation with NPWS. Areas not subject to rehabilitation would be limited to the formed alignment of Wallaces Creek Fire Trail, Link Road and Kings Cross Road, and any areas required to support ongoing maintenance of the permanent infrastructure. Construction activities are expected to be undertaken over an approximately 6-month period.

The impact of the Proposed Action on migratory species is subject to ongoing assessment and refinement. Environmental assessments of the Proposed Action commenced in late 2025 and are ongoing. An assessment of migratory species is being undertaken in the BDAR and Modification Report for the Proposed Action, as part of the approvals process under the NSW EP&A Act.

As discussed in Section 1.2.1, the final construction footprint (the area of direct disturbance) required for the Proposed Action would be approximately 16 ha, within the Proposed Action Area. The Proposed Action will impact up to 16 ha of potential foraging habitat for migratory species including:

- *Gallinago hardwickii* (Latham's snipe) (vulnerable)
- *Hirundapus caudacutus* (white-throated needletail) (vulnerable).

However, Proposed Action Area is not considered to constitute important habitat for the above migratory species as defined under the Significant Impact Guidelines 1.1. The Proposed Action Area is limited to a narrow, linear corridor largely associated with existing disturbance (e.g. fire trails, roads and easements) within a broader landscape that contains extensive similar habitat.

In particular:

- Habitat within the Proposed Action Area is not known to support an ecologically significant proportion of any migratory species population
- The Proposed Action Area does not comprise habitat of critical importance at particular life-cycle stages, such as breeding habitat
- The Proposed Action Area is not located at the limit of the species' range

While some migratory species are declining, the Proposed Action Area is not identified as a key site contributing to that decline.

For Latham's snipe, suitable wetland habitats are present within the broader landscape. However, sensitive wetland areas (including bogs and fens) would be avoided where practicable through design measures such as HDD. For white-throated needletail, the species is highly mobile and largely aerial, and does not rely on discrete habitat patches at the scale of the Proposed Action Area.

Operational impacts are expected to be negligible, as the infrastructure would be underground and would not generate emissions, noise or ongoing disturbance, with activities limited to periodic maintenance within existing access corridors.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEE identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.1.5.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact?

*

No

4.1.5.6 Describe why you do not consider this to be a Significant Impact. *

The impact of the Proposed Action on migratory species is subject to ongoing assessment and refinement. The Proposed Action is not considered likely to have a significant impact on migratory species, having regard to the criteria set out in the Significant Impact Guidelines 1.1.

The Proposed Action would result in disturbance of approximately 16 ha of potential foraging habitat for Latham's snipe and white-throated needletail. However, similar habitat is extensively available within the broader landscape. The Proposed Action Area is linear, and impacts would be localised and temporary, with the area being subject to rehabilitation following construction.

The Proposed Action is not expected to:

- substantially modify, destroy or isolate an area of important habitat for a migratory species
- result in the establishment of invasive species that are harmful to migratory species
- seriously disrupt the lifecycle (including breeding, feeding, migration or resting behaviour) of an ecologically significant proportion of a migratory species population

While the above migratory species may occur within the Proposed Action Area, the area does not constitute important habitat as defined under the Significant Impact Guidelines. In particular, it does not support an ecologically significant proportion of Latham snipe or white-throated needletail species population, nor provide habitat of critical importance at a life-cycle stage, such as breeding habitat.

Additionally:

- White-throated needletail is a highly mobile, aerial species that utilises a broad range of habitats and is unlikely to be affected by localised ground disturbance
- Latham's snipe is associated with wetland habitats, which are not a primary feature of the disturbance footprint and would be avoided where practicable.

On this basis, the Proposed Action is not considered likely to have a significant impact on migratory species.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEE identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.1.5.7 Do you think your proposed action is a controlled action? *

No

4.1.5.9 Please elaborate why you do not think your proposed action is a controlled action.

*

The impacts of the Proposed Action on migratory species is subject to ongoing assessment and refinement. Preliminary findings indicate that the Proposed Action is unlikely to result in significant impacts to migratory species.

Construction of the Proposed Action would involve activities including vegetation clearing, excavation, trenching, horizontal directional drilling, earthworks, vehicle movements and installation of cable infrastructure. These activities have the potential to result in temporary disturbance to foraging habitat for migratory birds. However, impacts would be limited to a narrow, linear construction footprint and would be temporary in nature, with disturbed areas rehabilitated following completion of works.

The Proposed Action is not expected to substantially modify, destroy or isolate an area of important habitat for migratory species. While the Proposed Action Area may provide potential foraging habitat for Latham's snipe and white-throated needletail, it is not considered to constitute important habitat. The Proposed Action Area is not known to support an ecologically significant proportion of any migratory species population, nor to provide habitat of critical importance at a particular life-cycle stage, such as breeding habitat.

Additionally, the Proposed Action will implement standard mitigation and management measures to ensure that invasive species that would adversely affect Latham's snipe or white-throated needletail are not established within the Proposed Action Area. The Proposed Action is not likely to seriously disrupt the lifecycle of an ecologically significant proportion of the population of the above migratory species.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEE identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application

4.1.5.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

A tiered approach has been adopted to avoid and minimise impacts to MNES. Refer to Attachment 3 for more detail on avoidance and minimisation of impacts during the early design stages of the Proposed Action.

An iterative design approach is currently being applied to the Proposed Action, informed by the outcomes of the environmental assessment and detailed site investigations, as well as ongoing consultation with State government agencies. The outcome of this iterative design process would be detailed in the Modification Report and the associated specialist studies.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEE identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including assessment of the avoidance, mitigation, repair and offset measures adopted by the Proposed Action.

4.1.5.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

Offsets for the Proposed Action have not been proposed for impacts to migratory species. In accordance with the *Environment Protection and Biodiversity Conservation Act 1999* Environmental Offsets Policy (DSEWPC 2012), offsets are only required where residual impacts are determined to be significant. As described in Sections 4.1.5.6 and 4.1.5.9, the Proposed Action is not expected to result in significant impacts to migratory species.

Accordingly, no significant residual impacts to migratory species are anticipated, and offsets are not considered necessary for impacts to migratory species.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including calculating offset requirements for the Proposed Action.

4.1.6 Nuclear

4.1.6.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.6.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The Proposed Action is not a nuclear action.

4.1.7 Commonwealth Marine Area

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.7.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.7.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The Proposed Action is not within or near a Commonwealth Marine Area. The Proposed Action is approximately 153 km inland from the nearest coastline.

4.1.8 Great Barrier Reef

4.1.8.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.8.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The Proposed Action is not within or near the Great Barrier Reef. The Proposed Action is approximately 1,300 km from the Great Barrier Reef.

4.1.9 Water resource in relation to large coal mining development or coal seam gas

4.1.9.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.9.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The Proposed Action is not a large coal mining nor coal seam gas development.

4.1.10 Commonwealth Land

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.10.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.10.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The Proposed Action Area is not located on, or adjacent to, Commonwealth land. The Proposed Action is approximately 62 km south-west of the closest Commonwealth land that is recorded on publicly available datasets.

4.1.11 Commonwealth Heritage Places Overseas

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.11.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.11.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact.

*

The Proposed Action does not relate to Commonwealth heritage places overseas.

4.1.12 Commonwealth or Commonwealth Agency

4.1.12.1 Is the proposed action to be taken by the Commonwealth or a Commonwealth Agency? *

Yes

4.1.12.2 Briefly describe the nature and extent of the likely impact on the whole of the environment. *

In July 2018 following the acquisition of all remaining shares of Snowy Hydro by the Commonwealth, Snowy Hydro became a Government Business Enterprise (GBE). As a result, for the purposes of this referral, and under the provisions of the EPBC Act, Snowy Hydro is considered to be a 'Commonwealth agency'.

The construction phase of the Proposed Action would involve activities including vegetation clearing, excavation, trenching, horizontal directional drilling, earthworks, vehicle movements and installation of cable infrastructure. These activities would result in temporary ground disturbance, removal or modification of vegetation, increased noise and vibration, and temporary increases in human presence and vehicle movements within the construction corridor.

The extent of disturbance would be limited to the Proposed Action Area assessed within this referral and would generally be linear in nature along the SCL alignment. Impacts would primarily occur during the construction phase and would be temporary, with disturbed areas rehabilitated following the completion of works in accordance with a Rehabilitation Management Plan to be developed by Snowy Hydro and approved by DPHI in consultation with NPWS. Areas not subject to rehabilitation would be limited to the formed alignment of Wallaces Creek Fire Trail, Link Road and Kings Cross Road, and any areas required to support ongoing maintenance of the permanent infrastructure. Construction activities are expected to be undertaken over an approximately 6-month period.

Impacts to water resources may arise from sediment mobilisation, localised drainage alteration and potential groundwater interaction during trenching and HDD activities, although these would be managed through standard erosion and sediment controls and construction methodologies. Impacts to flora and fauna are primarily associated with vegetation clearing and habitat disturbance within the construction footprint.

The use of fuels, machinery and construction equipment presents a risk of pollutant release. However, these risks are well understood and would be managed through established environmental management measures. Potential impacts to people and communities are limited given the remote location of the Modification Area, with impacts largely confined to temporary construction-related noise and vehicle movements. Impacts to Aboriginal and historical heritage values are expected to be avoided or minimised through established management measures.

During operation, the installed fibre optic cable would be located underground and would not generate emissions, noise or ongoing disturbance to the surrounding environment. Operational activities would be limited to periodic inspection and maintenance, which would be undertaken using existing access tracks and would not result in additional disturbance beyond the established operational footprint. As such, operational impacts to the environment are expected to be negligible.

The impacts of the Proposed Action on the whole of the environment is subject to ongoing assessment and refinement, in accordance with the Significant Impact Guidelines 1.2 (SIG 1.2). Consideration is being given to the potential for the Proposed Action to result in impacts across all aspects of the environment outlined in SIG 1.2, including landscapes and soils, water resources, flora and fauna, pollutants and chemicals, people and communities, and heritage values.

The Proposed Action is not expected to have any impacts on coastal landscapes and processes, or ocean forms and ocean life due to its inland location.

Snowy Hydro has resolved to take a precautionary approach and nominate that the Proposed Action has the potential to have a significant impact on the whole of the environment so that actual impacts can be assessed and documented within the Modification Report.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEE identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth

accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.2 Impact summary

Conclusion on the likelihood of significant impacts

You have indicated that the proposed action will likely have a significant impact on the following Matters of National Environmental Significance:

- Threatened Species and Ecological Communities (S18)

Conclusion on the likelihood of unlikely significant impacts

You have indicated that the proposed action will unlikely have a significant impact on the following Matters of National Environmental Significance:

- World Heritage (S12)
- National Heritage (S15B)
- Ramsar Wetland (S16)
- Migratory Species (S20)
- Nuclear (S21)
- Commonwealth Marine Area (S23)
- Great Barrier Reef (S24B)
- Water resource in relation to large coal mining development or coal seam gas (S24D)
- Commonwealth Land (S26)
- Commonwealth Heritage Places Overseas (S27B)
- Commonwealth or Commonwealth Agency (S28)

4.3 Alternatives

4.3.1 Do you have any possible alternatives for your proposed action to be considered as part of your referral? *

Yes

4.3.2 Do you have an alternative timeline you are proposing for your proposed action? *

No

4.3.3 Briefly describe why an alternate timeline for your proposed action was not possible.

*

The Proposed Action is for the construction and maintenance of communications infrastructure as part of the wider Snowy 2.0 Main Works Project. The timing of construction of this infrastructure is determined by the wider Snowy 2.0 construction schedule.

4.3.4 Do you have an alternative location you are proposing for your proposed action? *

Yes

4.3.6 Do you have alternative activities you are proposing for your proposed action? *

No

4.3.7 Briefly describe why an alternative activity for your proposed action was not possible. *

The Proposed Action involves undertaking an activity (i.e. the construction and maintenance of critical communications infrastructure) that has been approved as part of the Snowy 2.0 Main Works Project, in an area that is considered to be less constrained and environmentally sensitive and also within a shorter distance. The conceptual design for the Proposed Action is optimised to avoid significant environmental impacts whilst meeting Snowy Hydro's operational needs.

As the communications infrastructure is approved and required by the wider Snowy 2.0 Main Works Project, an alternative activity was not possible.

4.3.2 Alternatives: Location



Project Area: 42.63 Ha Disturbance Footprint: 42.63 Ha

4.3.2.1 Describe how the impacts and mitigation measures are different for your alternative location.

The approved SCL route is within proximity to the Proposed Action Area, being located approximately 16 km to the east of the Proposed Action Area at its furthest point in the north, and terminating in the same location as the southernmost extent of the Proposed Action Area (refer to Figure 1 in Attachment 1).

Given the proximity of the approved SCL route to the Proposed Action Area, it is likely that environmental values within the approved SCL route would be similar to those of the Proposed Action Area. Detailed identification and assessment of environmental values within the approved SCL route and the Proposed Action Area, and comparison of these values, is ongoing. It is considered likely that impacts associated with the Proposed Action Area would be much reduced than with the approved SCL route. Reasons for that being that the Proposed Action Area is approximately 19 km shorter than the section of the SCL route that will be removed, and the area through which the Proposed Action will traverse has been specifically located within in already cleared, developed and/or disturbed areas.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.3.2.2 Describe any public consultation that has been, is being or will be undertaken, including with Indigenous stakeholders in relation to the proposed alternative location.

The approved SCL route has already been assessed, including detailed public consultation, as part of the Snowy Hydro 2.0 Main Project. The Proposed Action is being proposed as an alternative to this already approved route.

Consultation with key stakeholders and State government agencies specifically for the Proposed Action has commenced in late 2025 and is ongoing. This has and will continue to involve consultation with First Nations groups and consultation with Federal and State regulators including DCCEE, DPHI and the EPA. Ongoing consultation would include consideration of comparison of the Proposed Action route to the currently approved SCL route.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEE identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.3.2.3 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed alternative location, and how are they relevant?

The following approvals are relevant to the alternative location as they confer approval to the SCL route:

- EPBC 2018/8322 approval for the main works associated with Snowy Hydro 2.0 under the EPBC Act
- The Main Works Project (SSI-9687) approval of Snowy Hydro 2.0 under the EP&A Act

4.3.4 Alternatives: Impact and mitigation

4.3.4.1 Do these alternatives have a different impact, avoidance, or mitigation measure compared to what you have already provided? *

Yes

4.3.4.2 On World Heritage properties *

No

4.3.4.4 On National Heritage places *

Yes

4.3.4.5 Describe how this alternative has different impacts or mitigations from the original proposal, on National Heritage places. *

The potential impact of the Proposed Action on National Heritage places has yet to be determined. Given that the Proposed Action Area is approximately 19 km shorter than the section of the SCL route that will be removed, and the area through which the Proposed Action will traverse has been specifically located within in already cleared, developed and/or disturbed areas, it is considered likely that the Proposed Action would have reduced impacts on National Heritage compared to the currently approved SCL route.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.3.4.6 On the ecological character of a Ramsar wetland *

No

4.3.4.8 Listed threatened species, their habitat, or threatened ecological communities *

Yes

4.3.4.9 Describe how this alternative has different impacts or mitigations from the original proposal relating to listed threatened species, their habitat, or threatened ecological communities. *

The potential impact of the Proposed Action on threatened species and ecological communities has yet to be determined. Given that the Proposed Action Area is approximately 19 km shorter than the section of the SCL route that will be removed, and the area through which the Proposed Action will traverse has been specifically located within in already cleared, developed and/or disturbed areas, it is considered likely that the Proposed Action would have reduced impacts on National Heritage compared to the currently approved SCL route.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.3.4.10 Listed migratory species or their habitat *

Yes

4.3.4.11 Describe how this alternative has different impacts or mitigations from the original proposal relating to listed migratory species or their habitat. *

The potential impact of the Proposed Action on migratory species has yet to be determined. Given that the Proposed Action Area is approximately 19 km shorter than the section of the SCL route that will be removed, and the area through which the Proposed Action will traverse has been specifically located within in already cleared, developed and/or disturbed areas, it is considered likely that the Proposed Action would have reduced impacts on National Heritage compared to the currently approved SCL route.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.3.4.12 Is a Nuclear action *

No

4.3.4.14 On Commonwealth Marine Areas *

No

4.3.4.16 Taking place in or flowing into the Great Barrier Reef Marine Park *

No

4.3.4.18 Impacts a water resource relating to a coal seam gas or large coal mining development *

No

4.3.4.20 On or near Commonwealth Land *

No

4.3.4.22 On Commonwealth heritage places overseas *

No

4.3.4.24 Action undertaken by the Commonwealth or a Commonwealth Agency *

Yes

4.3.4.25 Describe how this alternative has different impacts or mitigations from the original proposal relating to the action being undertaken by the Commonwealth or a Commonwealth Agency. *

The potential impact of the Proposed Action on the whole of environment (as an action being undertaken by a Commonwealth Agency) has yet to be determined. Given that the Proposed Action Area is approximately 19 km shorter than the section of the SCL route that will be removed, and the area through which the Proposed Action will traverse has been specifically located within in already cleared, developed and/or disturbed areas, it is considered likely that the Proposed Action would have reduced impacts on National Heritage compared to the currently approved SCL route.

As discussed in Section 1.2.1 of this Referral, early consultation with DCCEEW identified that an accredited assessment process would be sought under section 87(4) of the EPBC Act where the Commonwealth accredits the assessment process under Division 5.2 of the EP&A Act. This would enable the DPHI to manage the assessment of the Proposed Action, including the issuing of the assessment requirements for the modification application.

4.3.5 Alternatives: Considered alternatives

4.3.5.1 Do you have any other alternative actions, including not taking the action, that you have considered but are not proposing as part of this referral? *

Yes

4.3.5.2 Describe the details of this possible alternative that you have considered but are not proposing. *

“Do Nothing Option” - Not undertaking the proposed action was considered as a feasible alternative to the Proposed Action. This option would involve progressing with the approved route for the SCL for the 35 km route and would forego the benefits of a shorter route, with reduced environmental impacts as part of the Proposed Action.

“Open trenching only” - Open trenching was considered as an alternative construction methodology for the 15.3 km route of the Proposed Action. While this option would avoid constraints and environmentally sensitive areas associated with the approved SCL route, there would be impacts to a number of new sensitive landscapes .

“Combination of open trenching and horizontal directional drilling (HDD)” – The preferred alternative for the Proposed Action is utilising a combination of open trenching and HDD to minimise surface disturbance and impacts to sensitive areas.

Refer ‘Attachment 3 – Avoidance and Mitigation Measures.PDF’, Page 1.

5. Lodgement

5.1 Attachments

1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 1 - Figures.pdf Figures of the Proposed Action	03/03/2026	No	High
#2.	Document	Attachment 2 - Schedule of lands.pdf Schedule of Lands	03/03/2026	No	High

1.3.2.18 (Person proposing to take the action) If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Annual Report For the Financial Year ended 30 June 2025 https://www.snowyhydro.com.au/wp-content/uploads..			High
#2.	Link	Environment Policy https://www.snowyhydro.com.au/wp-content/uploads..			High
#3.	Link	Main Works Environmental Management Strategy https://www.snowyhydro.com.au/wp-content/uploads..			High

2.2.5 Tenure of the action area relevant to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 1 - Figures.pdf Figures of the Proposed Action	03/03/2026	No	High
#2.	Document	Attachment 2 - Schedule of lands.pdf Schedule of Lands	03/03/2026	No	High

3.4.1 Hydrology characteristics that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 1 - Figures.pdf Figures of the Proposed Action	03/03/2026		High

4.1.2.10 (National Heritage) Avoidance or mitigation measures proposed for this action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 3 - Avoidance and Mitigation.pdf	03/03/2026	No	High

Summary of the key avoidance and mitigation strategies for MNES

4.1.4.10 (Threatened Species and Ecological Communities) Avoidance or mitigation measures proposed for this action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 3 - Avoidance and Mitigation.pdf Summary of the key avoidance and mitigation strategies for MNES	03/03/2026	No	High

4.1.5.10 (Migratory Species) Avoidance or mitigation measures proposed for this action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 3 - Avoidance and Mitigation.pdf Summary of the key avoidance and mitigation strategies for MNES	03/03/2026		High

4.3.5.2 (Considered alternatives) Details of possible alternatives that you have considered but are not proposing

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment 3 - Avoidance and Mitigation.pdf Summary of the key avoidance and mitigation strategies for MNES	03/03/2026		High

5.2 Declarations

Completed Referring party's declaration

The Referring party is the person preparing the information in this referral.

ABN/ACN	18059519041
Organisation name	UMWELT (AUSTRALIA) PTY. LTD.
Organisation address	2284 NSW
Representative's name	Alexander Garrett
Representative's job title	Senior Environmental Scientist
Phone	+61449253999
Email	alexander.garrett@umwelt.com.au
Address	Unit 3 2/6 Shea St, Phillip ACT 2606

Check this box to indicate you have read the referral form. *

Check this box to confirm these are the correct identification details. *

By checking this box, I, **Alexander Garrett of UMWELT (AUSTRALIA) PTY. LTD.**, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

Completed Person proposing to take the action's declaration

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	17090574431
Organisation name	SNOWY HYDRO LIMITED
Organisation address	2630 NSW
Representative's name	Lisa McKeown

Representative's job title	General Manager Health Safety and Environment - Snowy 2
Phone	02 6453 2888
Email	s2.0centralhse@snowyhydro.com.au
Address	PO Box 332, Cooma NSW 2630

Check this box to indicate you have read the referral form. *

Check this box to confirm these are the correct identification details. *

I, **Lisa McKeown of SNOWY HYDRO LIMITED**, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

Completed Proposed designated proponent's declaration

The Proposed designated proponent is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

Check this box to indicate you have read the referral form. *

Check this box to confirm these are the correct identification details. *

I, **Lisa McKeown of SNOWY HYDRO LIMITED**, the Proposed designated proponent, consent to the designation of myself as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

