snowy hydro



Cloud Seeding Program 2019 Operations Report

September 2020

Introduction

Snowy Hydro Limited (Snowy Hydro) relies on precipitation falling over the catchments of the Snowy Mountains to supply water for the production of hydroelectricity. Cloud seeding over this area is used to enhance snowfall, ultimately leading to increased runoff and water available to produce energy.

Cloud seeding operations undertaken by Snowy Hydro are authorised by the *Snowy Mountains Cloud Seeding Act 2004* (NSW) (SMCS Act).

The SMCS Act mandates that cloud seeding operations may only be carried out in accordance with an Environmental Management Plan (EMP) approved by the Minister administering the *Environmental Planning and Assessment Act 1979*, and the Minister administering Part 4 of the *National Parks and Wildlife Act 1974* (the 'relevant Ministers').

In accordance with the SMCS Act, the EMP must be reviewed at least once every five years. The current Cloud Seeding Program EMP was formally approved by the relevant Ministers on 28 June 2018.

The SMCS Act requires Snowy Hydro, by 31 March in each year, to report on cloud seeding operations during the previous year to the relevant Ministers and to the EPA. The report must include details of compliance with the EMP and details of research monitoring the impact of seeding agents on the environment. The EPA is appointed to review each report on cloud seeding operations, and report the findings of the review and any resulting recommendations to the Board of the EPA and the relevant Ministers.

Snowy Hydro submitted the Cloud Seeding Program 2019 Annual Compliance Report to the relevant Ministers and the EPA in March 2020. The report demonstrated that Snowy Hydro has complied with all obligations set out within the EMP and responsibly carried out cloud seeding operations in accordance with the SMCS Act. Importantly, the 2019 Annual Compliance Report confirmed there continues to be no evidence of any significant adverse environmental impacts associated with cloud seeding activities.

The subsequent EPA review¹ published in July 2020 supported these findings.

The key points of the 2019 Annual Compliance Report that are described fully in the following sections of this report:

- Operations, including the duration over which cloud seeding occurred and the total amount of cloud seeding agent released over the season;
- Meteorological monitoring, including controls to ensure precipitation falls as snow to at least 1400 metres during cloud seeding operations and assessment of downwind impacts; and
- Environmental monitoring, including summary statistics of the monitoring program and details of research monitoring the impact of seeding agents on the environment.

¹Report on the findings of the NSW Environment Protection Authority's review of Snowy Hydro Cloud Seeding Program. 2019 Annual Compliance Report. Available from https://www.epa.nsw.gov.au/legislation/snowy-hydro-cloud-seed.htm



Finally, the findings and recommendations of the EPA review are provided.

Operations

Target area

The SMCS Act states that the area primarily targeted for increased precipitation must land within the Snowy water catchment.

An area of approximately 2110 km² was targeted during 2019 cloud seeding operations. Figure 1 shows both the target area and the Snowy water catchment boundaries.

Hours of operation

The SMCS Act stipulates that operations are only to be carried out when precipitation is likely to fall as snow to at least 1400 metres. Consequently, cloud seeding operations take place throughout the cool-season months, typically between May and October.

In 2019, a total of 147 hours and 4 minutes of cloud seeding occurred between 27 May 2019 and 08 September 2019.

Seeding agent and method of discharge

Silver iodide is the approved seeding agent. Silver is naturally present in the atmosphere, soil and sediments of the Snowy Mountains. Silver iodide is used as the ice nucleating material because it has similar physical properties to an ice crystal. It is also insoluble in water and does not become biologically available in the environment. In 2019, approximately 59.1 kg of silver iodide was dispersed over the 2110 km² target area (~0.028 kg per square kilometre).

Land-based aerosol generators are the approved method to disperse the seeding material. The seeding agent is released by up to 23 ground-based generators located along the western perimeter of the target area when suitable atmospheric conditions are present².

Operational incidents

There were no accidents or breakdowns resulting in spillage of cloud seeding agents, fuel, or failure of controls specified in the EMP.

² For explanation of how cloud seeding works and the atmospheric conditions required for cloud seeding operations, see http://www.snowyhydro.com.au/our-energy/cloud-seeding





Figure 1: Map showing the Snowy water catchment (the area approved for cloud seeding) and the area which is primarily targeted for increased precipitation from cloud seeding operations (approximately 2110 km²)



Meteorological Monitoring

Snow level criterion

The SMCS Act mandates that the discharge of the seeding agent is to be carried out at a time when increased precipitation is likely to fall as snow to at least 1400 metres above sea level.

Prior to and during cloud seeding operations, weather balloons are released at intervals of three hours or less to monitor atmospheric conditions. Cloud seeding does not commence, or is suspended, if the freezing level measured over the catchment is higher than 1600 metres. This is to ensure precipitation falls as snow to at least 1400 metres.

Additional controls are implemented if the freezing level is between 1550 and 1600 metres, including monitoring live camera feeds and verifying conditions with personnel within the target area.

During 2019:

- Cloud seeding operations did not commence when the freezing level over the catchment was greater than 1600 metres.
- There were no instances where the freezing level rose above 1600 metres during operations.
- There were two seeding events where the observed freezing level was between 1550 1600 metres, triggering additional controls:
 - In one event, cameras within the target area were monitored and no rain was observed falling at locations between 1327 and 1481 metres; in addition, personnel at two locations within the target area at elevations of approximately 1350 metres confirmed no rain precipitation and seeding operations continued.
 - In the second event, external personnel at a location within the target area at an elevation of approximately 1350 m reported rain precipitation at which stage cloud seeding operations were suspended.

Potential downwind impact

The cloud seeding program has been designed so that additional precipitation from cloud seeding falls over the target area. A component of the design is routine monitoring of precipitation to identify any possible effects of cloud seeding extending outside the target area.

Data from the Bureau of Meteorology and Snowy Hydro weather stations provide the basis for comparison of the temporal and spatial variability of precipitation across the region during the winter months, both before and after cloud seeding operations commenced in 2004.

Analyses of precipitation amounts over 1990-2019 continue to show no evidence of an effect from cloud seeding on precipitation downwind of the target area. This supports the results of previous, independent analyses by the Natural Resources Commission (NRC)³.

³ NRC Review of SPERP Annual Report 2011 (July 2012), available from <u>www.nrc.nsw.gov.au/cloud-seeding</u>.



Environmental Monitoring

Environmental chemistry

Snowy Hydro has monitored silver concentrations in a range of environmental matrices at potential accumulation zones within and around the target area since the commencement of cloud seeding over the Snowy Mountains in 2004. Analyses of silver concentrations from samples collected prior to the commencement of cloud seeding in 2004 through to 2019 continues to show no evidence that cloud seeding has contributed to increased levels of silver in any of the areas, or in any of the environmental matrices monitored.

The objectives of the monitoring program are to detect increases in the concentrations of silver compared with baseline concentrations, and to assess concentrations of silver compared with agreed guideline values of 0.1 mg/L for potable water and 1 mg/kg for all other matrices.

The EMP prescribes the number of sampling sites for each matrix and area, the replicates collected and analysed for each site and the sampling frequency. Once environmental samples are collected, they are sent to an independent laboratory for chemical analysis. The results are independently audited and analysed statistically.

In accordance with the EMP, potable water was the only matrix sampled following the cessation of the 2019 season. The total number of samples analysed in 2019 along with summary statistics of silver concentrations is shown in Table 1. All measurements are well below the relevant guideline values.

Table 1: Summary of silver concentrations in 2019 potable water samples (ng/L). The guideline value for silver in potable water is 100,000 ng/L

Matrix	Number of samples	Minimum	Mean	Maximum	Guideline value
Potable Water	33	0.11	2.02	40.78	100,000



Aquatic ecology

Analyses of data collected following the 2018 season showed no evidence of any difference over time in the impairment of the macroinvertebrate assemblages or multivariate structure of edge or riffle assemblages which could be related to cloud seeding. Aquatic macroinvertebrates sampling will therefore take place after the 2023 cloud seeding season, in accordance with the EMP.

EPA Review

Following submission of the 2019 Annual Compliance Report, the EPA published its review in July 2020. The EPA concluded:

- "Snowy Hydro Limited has complied with all of its obligations as detailed in the Act
- Snowy Hydro Limited has complied with all of its obligations as detailed in the Environmental Management Plan for cloud seeding operations approved by the relevant Ministers on 28 June 2018
- Snowy Hydro Limited has complied with all of its obligations as detailed in the Protection of the Environment Operations Act 1997
- silver concentrations in potable water remain several orders of magnitude below relevant guideline values. This finding is based on sampling carried out during the 2019 cloud seeding season."

The recommendations were:

- "monitoring be continued as per the schedule of the EMP, and data compared over time to identify trends
- future reviews to be undertaken in consultation with input from partner agencies of the National Parks and Wildlife Service and the Department of Planning, Industry and Environment
- Snowy Hydro Limited continue to pursue research opportunities on the cloud seeding operations in the Snowy Mountains
- the outcomes of this review are communicated to the relevant Ministers."

Conclusion

The 2019 Annual Compliance Report detailing cloud seeding operations and activities through 2019 was submitted to the relevant Ministers and EPA in March 2020. The EPA reviewed the report and confirmed Snowy Hydro has complied with all obligations set out in the SMCS Act and detailed within the EMP through the reporting period. There continues to be no evidence of any significant adverse environmental impacts associated with cloud seeding activities.

For more information on Snowy Hydro's Cloud Seeding Program please refer to our website, <u>http://www.snowyhydro.com.au/our-energy/cloud-seeding/</u>.