14.12.2020

Dear Commissioners,

I urge you to **reject** the proposed expansion of Dendrobium Mine.

I am a Wollongong resident and have grown up within 10km of Dendrobium Mine. I believe that the arguments in favour of this mine are being overstated and am worried that the proposed expansion will contribute to the degradation of the local and global environment within my lifetime and in the lifetime of generations still to come.

A common argument used to promote projects such as this one is something along the lines of “we need steel and steel needs metallurgical coal, so we need metallurgical coal mines”. I would like to briefly point out that steel does **not** need metallurgical coal. As of last year, around 26% of the world’s steel was produced without the use of coal[[1]](#footnote-1). There are production methods that rely on carbon in the form of biomass, as well as relatively new, up-and-coming technologies such as hydrogen reduction and electrolysis to produce steel. These may be powered entirely by renewable electricity, and for this reason, steel produced in such a matter is often called “green steel”.

There have been many recent cases of green steel around the world, especially in Europe and the US. In Australia, there is also movement towards green steel, with Whyalla steelworks planning to be the world’s largest producer of carbon neutral steel by 2030[[2]](#footnote-2). The Grattan Institute has also published work of the opinion that green steel has the potential to become a major industry in Australia[[3]](#footnote-3).

I believe the cost-benefit analysis (CBA) conducted by Cadence Economics and presented by the proponents does not sufficiently consider this growing industry and the reality that coal will become redundant in the next decades. I also believe it inappropriately underestimates the cost of emissions to the community in two ways:

Scope 3 emissions are not considered

Section 14 (2) of NSW State Environmental Planning Policy (Mining, Petroleum Production and Extractive Industries) Act states:

*in determining a development application for development for the purposes of mining, petroleum production or extractive industry, the consent authority must consider an assessment of the greenhouse gas emissions (including downstream emissions) of the development, and must do so having regard to any applicable State or national policies, programs or guidelines concerning greenhouse gas emissions.*

The IPC is the consent authority in this situation and so you must therefore consider downstream emissions (scope 3 emissions). The CBA does not consider scope 3 emissions and should therefore not be considered conclusive. In addition to this cost-benefit consideration of scope 3 emissions, the IPC ought to consider their relevance to the world’s carbon budget to align with goals agreed as part of the 2015 Paris Accord

The labels of scope 1, scope 2 and scope 3 are designed so that emissions can be counted accurately in an interconnected system such as a state, industry or country. They ensure that when compiling emission information across multiple parties, all emissions are counted, and are counted exactly once. These labels are not intended to represent the moral responsibility that each party holds for such emissions. All parties involved in producing emissions are responsible for them.

**I ask you to consider the moral responsibility of the NSW people to account for the scope 3 emissions that this expansion of Dendrobium mine would lead to. This ought to be enough to reject this proposal.**

Inappropriate scaling of emissions cost by NSW population

The submitted CBA argues that the NSW population is approximately one thousandth of the global population, and so the climate change effects felt by NSW residents are going to be one thousandth of that felt by the global population. This may be the case, but that does not absolve Illawarra Coal of the other 99.9% of responsibility for their emissions.

If this kind of argument were standard, the vast majority of global emissions would be unaccounted for in project proposals. This argument also relies upon borders that are completely arbitrary and have nothing to do with the proposal. If this approach were legitimate, it is conceivable that a mass migration to NSW could lead to this CBA considering the Dendrobium expansion detrimental. If the population of Byron Bay or Broken Hill can swing the result of a CBA for a mine in the Illawarra, there is something wrong with the CBA.

**The IPC has been given 100% authority to reject or approve this mine. The IPC ought to consider 100% of emissions from this mine expansion, not 0.1%.**

I wish I did not have to write documents like this. I wish DPIE would do proper assessments rather than relying on the community to point out problems, and I wish they would properly scrutinise shonky analysis such as that done by Cadence Economics.

I am however a NSW resident, and a Wollongong local. It is not my job, but I still have responsibility to ensure that NSW is a good global citizen. Because of the position you have been granted, you have this same responsibility many times over. Please take this responsibility seriously. Please reject this proposal.

Sincerely,

Dylan Green

BMath, BSc

1. *Gloucester Resources Limited v Minister for Planning [2019] NSWLEC 7,* Land and Environment Court NSW, point 547, accessed 26.10.2020 at: <https://www.caselaw.nsw.gov.au/decision/5c59012ce4b02a5a800be47f> [↑](#footnote-ref-1)
2. *GFG’s Greensteel transformation in Whyalla*, Sherrie Mazur, FENCiT, June 2020, p10, accessed 26.10.2020 at: <https://june2020.thefence.com.au/2/> [↑](#footnote-ref-2)
3. *Green steel is no longer a fantasy*, Tony Wood, 11.05.2020, accessed 25.10.2020 at: <https://grattan.edu.au/news/green-steel-is-no-longer-a-fantasy/> [↑](#footnote-ref-3)