

**Submission regarding the proposed Blast Furnace 6 Reline Proposal
SSI-22545215 by BlueScope Steel (AIS) Pty Ltd (BlueScope)**

I have been born and raised in Wollongong, and continue to reside here. I am the daughter of a metallurgist. My father spent all his working life at Bluescope's Port Kembla steelworks (formerly BHP) and Glenbrook facility (formerly NZ Steel). There have been important incremental improvements over the decades in steel production methods that has greatly reduced the pollution, improved efficiency and improved the wellbeing of both the workforce and the local community. Right now we need a step-jump in innovation in the steel manufacturing process to ensure that Australia can manage the macro-economic challenges to come. It is essential to Australia's sovereign steel production that we rapidly seek best practice in low emissions steel manufacturing, not put lipstick on a pig by relining blast furnace #6.

I strongly object to BlueScope's proposal to reline their No.6 Blast Furnace at this time. I support Australian steel making through low emissions production of option 4, and in the meantime scaling up the recycling of scrap steel in an electric arc furnace powered through renewably sourced electricity.

I object to option 4 – the reline of #6 blast furnace (the project) as it will lock in a very high emissions production method for more than 20 years. A 2% emissions reduction on annual emissions of 6,868,848 tCO₂-e is insufficient, and will continue to accelerate the disastrous social, environmental and economic consequences of climate change. I had family lose their house in the 2019/20 bushfires in the rainforest hamlet of Nymboida in the Clarence Valley. The economic loss and emotional trauma of such climate change exacerbated natural disasters far outweigh the benefit of raw steel production. It is remiss of the social impact report not to include the social impact of high greenhouse gas emissions through climate change. The 6th Intergovernmental Panel on Climate Change Report¹ highlights that "human-induced climate change is causing dangerous and widespread disruption in nature and affecting the lives of billions of people around the world.". Hoesung Lee, Chair of the IPCC states that "It shows that climate change is a grave and mounting threat to our wellbeing and a healthy planet. Our actions today will shape how people adapt and nature responds to increasing climate risks."

This IPCC 6th Report has a particular focus on transformation¹⁶ and system transitions in energy; land, ocean, coastal and freshwater ecosystems; urban, rural and infrastructure; and industry and society. Option 4, the reline of blastfurnance #6 is no where near to meeting that challenge.

This proposal should trigger assessment under the EPBC Act because climate change is a key threatening process for many species and ecosystems, as well as being an existential threat to human life and development. It is a key failure of the existing EPBC Act is the failure to effectively address climate change.

¹ [Climate Change 2022: Impacts, Adaptation and Vulnerability | Climate Change 2022: Impacts, Adaptation and Vulnerability \(ipcc.ch\)](https://www.ipcc.ch/report/ar6/wg2/)
<https://www.ipcc.ch/report/ar6/wg2/>

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The opportunity to scale up recycling, instead of blast furnace production, is particularly evident when we consider how underdeveloped steel recycling is within Australia. The EIS states the high cost and low quality of scrap steel as a reason not to pursue the replacement of blast furnace technology with an electric arc furnace. Waste Management Review reports that “Australia has been exporting an average of 2.39 million tonnes of scrap metal per annum from 2017 to 2021 according to data from the Department of Agriculture, Water and Environment (DAWE)”.² The National Waste and Recycling Industry Council (NWRIC) also has highlighted that “Increasing scrap content in existing primary and secondary steelmaking facilities is an immediate step the steel industry can take as they move towards low carbon “green” steel while hydrogen technology is being developed.” However, “several national and state regulatory changes must happen to keep ferrous scrap in Australia.” I support the NWRIC calls that ““federal government banning the export of unprocessed scrap, state EPAs licensing all car breaking operations.” Furthermore, IEEFA report³ that “buildings and infrastructure take the majority of global steel, with such products as rebar, sections, engineering and construction bars, where impurities in scrap are less of an encumbrance”. Please reject this blastfurnance reline proposal, or at least make the increased use scrap steel a condition of its operation. Recycling scrap steel will also align with Bluescope’s circular economy aspirations.

Furthermore I strongly object to the use of coking coal sourced from under the Sydney-Illawarra drinking water catchment. The recent Independent Planning Commission (IPC) on the Dendrobium expansion highlighted it would have direct devastating impacts through subsidence, dewatering and desiccating the surface vegetation and destroy upland swamps. These upland swamps are Endangered Ecological Communities that are a natural sponge ensuring there is sustained water flow in numerous creeks feeding into our water catchment. Hydrated upland swamps with an intact subsurface layer are retardant to bushfires. Intact upland swamps are a natural sequester of carbon, converting atmospheric carbon to peat through plant photosynthesis and the incomplete decomposition of the remains of plants growing in waterlogged conditions. However if cracked and dried the peat will insatiably burn and lead to total ecosystem collapse.

² [Time to ban the export of unprocessed scrap metal - Waste Management Review](https://wastemanagementreview.com.au/time-to-ban-scrap-metal-export/)
<https://wastemanagementreview.com.au/time-to-ban-scrap-metal-export/>

Published by Waste Management Review on 5 August 2021

³ [IEEFA: Is there scope for faster decarbonisation of Australian steel? - Institute for Energy Economics & Financial Analysis](https://ieefa.org/ieefa-is-there-scope-for-faster-decarbonisation-of-australian-steel/)
<https://ieefa.org/ieefa-is-there-scope-for-faster-decarbonisation-of-australian-steel/>

Published by IEEFA on 24 January 2022

Since the 2021 Dendrobium IPC Bluescope has upgraded their berths with faster ship unloaders so to create gaps on the berth that enable faster import of raw materials. This has increased their capacity to import coking coal from Queensland and other coal fields and reduced their reliance on coal sourced from the under the Sydney-Illawarra drinking water catchment.

Presentation

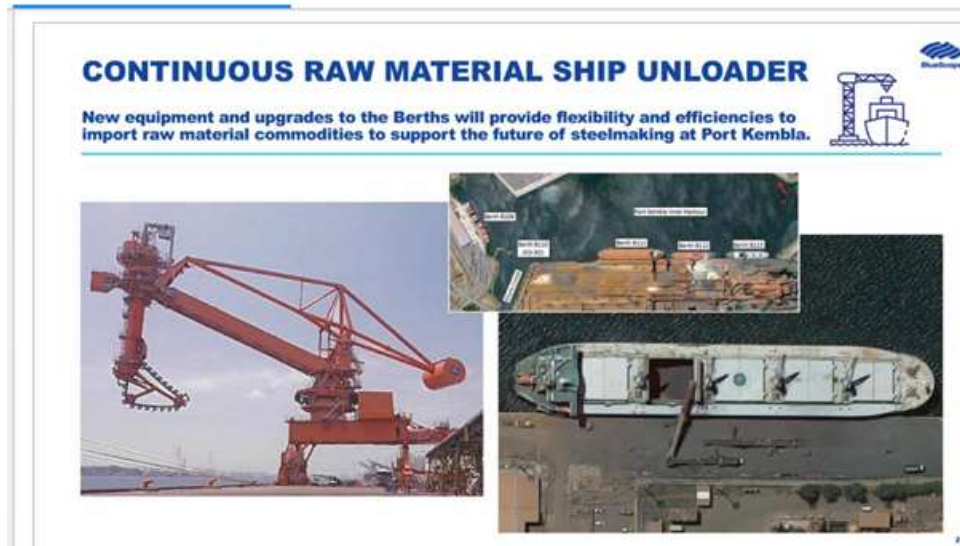


Image source: Bluescope Presentation on the Future of Steel Making, October 2021, slide 27:

<https://services.choruscall.com/mediaframe/webcast.html?webcastid=7AiLhNKM&securityString=I5w7eCBwormYJvEtgs4KtY8j>

Please ensure this key raw materials supply chain issue is addressed to ensure the social impact of degrading the drinking water catchment of 5 million Sydney-Illawarra residents is avoided. There is a significant social benefit to protecting the Sydney-Illawarra drinking water catchment from underground coal mining. During the Dendrobium IPC Bluescope supported the expansion of mining in the drinking water catchment, and were found to make misleading claims. To quote the Statement of Reasons in the IPC determination:

“The dependence of Bluescope Steelworks on Wongawilli Seam coal from the Dendrobium Mine is unclear given that the Wongawilli Seam coal would not be available for some considerable time after the proposed cessation of longwall mining at Denrbobium Mine in 2024 even if the Project was approved. This is based on the Applicant’s (South 32) scheduling of Area 5 (Bulli Seam) from 2024, followed some 19 years later by Area 6 (Wongawilli Seam). The Commission does not accept the suggested dependence of BlueScope Steelworks on ongoing access to the Wongawilli Seam coal from the Project.”⁴

⁴ Dendrobium Extension Project SSD 8194, Statement of Reasons for Decision, Independent Planning Commission Mr Stephen O’Connor (Chair), Mr John Hann.

https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2020/10/dendrobium-extension-project-ssd-8194/determination/210205_ssd-8194-dendrobium-extension-project_statement-of-reasons.pdf

5 February 2021

During the Dendrobium IPC Bluescope also claimed that

“any significant increase in seaborne coal imports would require very substantial capital investment to expand the facilities. BlueScope has recently estimated such investment to be at least \$150 million.”⁵

However, the upgrade of the import berth has now been portrayed as somewhat routine, common-sense upgrade that will benefit the business more broadly, not just enabling larger volumes of coal imports.

Claims that the Bluescope steelworks are dependent on Dendrobium Mine or the Wongawilli Seam coal are having a negative social impact on our decision making systems. There has been a conflation between steel making and coal mining in the Southern Coalfields, even though the majority of locally hewn coal is exported, and there is interstate coal import capacity at Bluescope. This negative impact on decision making system has manifested in calls for political interference to overturn the IPC⁶, scare mongering claims that the determination “creates a period of great uncertainty for over 10,000 coal and steel workers”⁷, abuse of against WaterNSW the lead agency to manage the drinking water catchment⁸, and warnings that “ the credibility of the NSW Planning System was on the line and the Illawarra community faced being short changed by dubious economic claims”⁹. Furthermore, despite being rejected by the IPC the Dendrobium expansion proposal has been granted a new assessment pathway as state significant infrastructure on the alleged claim that it’s critical to the steelworks.

The IPC said:

"Based on the potential for long-term and irreversible impacts — particularly on the integrity of a vital drinking water source for the Macarthur and Illawarra regions, the Wollondilly Shire and metropolitan Sydney — it is not in the public interest."

⁵ Bluescope submission to Dendrobium IPC [201215-bluescope.pdf \(nsw.gov.au\)](https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2020/10/dendrobium-extension-project-ssd-8194/public-submissions/201215-bluescope.pdf)
<https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2020/10/dendrobium-extension-project-ssd-8194/public-submissions/201215-bluescope.pdf>

15 December 2020

⁶ NSW One Nation Mark Latham pushes for legislative solution to Dendrobium mine rejection
<https://www.abc.net.au/news/2021-02-17/one-nations-mark-latham-fights-ipc-dendrobium-mine-rejection/13163864>

Written by Kelly Fuller and published by ABC Illawarra 17 February 2021

⁷ “Statement on Dendrobium Coal Mine application and IPC decision”
<https://paulscullymp.com.au/news/media-releases/statement-on-dendrobium-coal-mine-application-and-ipc-decision/>

Published by the Member for Wollongong, the Honourable Mr Paul Scully on 5 February 2021

⁸ [Dendrobium coal mine expansion rejected by planning commission, John Barilaro vows to overturn ruling - ABC News](https://www.abc.net.au/news/2021-02-05/dendrobium-coal-mine-expansion-rejected-by-planning-commission/13124466)
<https://www.abc.net.au/news/2021-02-05/dendrobium-coal-mine-expansion-rejected-by-planning-commission/13124466>

Reported by Ainslie Drewitt Smith, published by ABC Illawarra on 5 Feb 2021

⁹ [Independent economic assessment of Dendrobium Expansion required for State Significant Infrastructure assessment to have credibility - Justin Field MLC](https://www.justinfield.org/independent_economic_assessment_of_dendrobium_expansion_required)
https://www.justinfield.org/independent_economic_assessment_of_dendrobium_expansion_required

Written by MLC Justin Field and published 6 December 2021

The Minister responsible for Resources, Paul Toole, said that

“The decision to declare the project SSI states that it is due to the mine's role in providing essential metallurgical coal for local steel production in NSW.”¹⁰

Environmental Planning consultants Clayton Utz have commented that

“This is an unprecedented step, providing a pathway for the submission of an alternative mine plan to the NSW Minister for Planning and Public Spaces to be assessed as SSI where the project was already rejected by the IPC. The IPC has the benefit of operating independently of other government departments, including the NSW Department of Planning, Industry and Environment, and plays an important role in building community confidence in the decision-making processes for major development.

The decision to declare the project SSI is particularly interesting in this case as steelmaking is one of the biggest greenhouse gas emitters worldwide and is a focus for the emerging green hydrogen industry.

If the decision to declare the project SSI remains unchallenged and South32 submits an alternative plan for assessment by the Minister, this could serve an interesting precedent for future contentious infrastructure projects that can demonstrate significant economic or social benefits to NSW.”¹⁰

To restore community confidence in the decision making process it is important that the operation of the blastfurnace, should it be approved, does not presume the degradation of the drinking water catchment. This can be achieved by making an exclusion on metallurgical coal hewn from the drinking water catchment within the conditions of consent.

I have another concern about the social impact of this decision making process. I attended an in-person and on-line event in which Bluescope had a platform to present their proposal for the blast furnace reline, and there was never a critical assessment provided. It has fallen to unfunded community volunteers to make critical submissions, an impost considering the lengthy, iterative complicated and difficult to evaluate EIS. The proponent driven presentations mean that the public consultation is not independent or robust. This is a poor decision making process, not a neutral one. Furthermore I object to the conflation of the operation of blastfurnace #5 with the proposed re-opening of blast furnace #6. Blast furnace #5 was granted approval to operate long before the social impact of greenhouse gas emissions were widely understood by the public.

In summary, the social impact of the blast furnace operation, and it's need for coking coal, has been deleterious to health and wellbeing, as well as decision making within NSW.

¹⁰ [IPC rejected mine extension project declared State Significant Infrastructure
https://www.claytonutz.com/knowledge/2021/december/ipc-rejected-mine-extension-project-declared-state-significant-infrastructure#:~:text=The%20NSW%20Government%20recently%20announced,economic%2C%20environmental%20or%20social%20reasons.](https://www.claytonutz.com/knowledge/2021/december/ipc-rejected-mine-extension-project-declared-state-significant-infrastructure#:~:text=The%20NSW%20Government%20recently%20announced,economic%2C%20environmental%20or%20social%20reasons.)

Bluescope's lobbying for overturning the IPC determination on the expansion of Dendrobium mine under the Sydney-Illawarra drinking water catchment, and the government's acquiescence to grant the project rejected by the IPC with a new State Significant Infrastructure assessment pathway based on the unsupported claim that it is essential for blast furnace operation, seriously degrades the blastfurnance's social license¹¹. This seems to be state capture by mining interests and is causing a serious erosion of public confidence in our parliamentary processes, government department and public agencies.

I am also concerned that this blastfurnance reline will be detrimental to livelihoods when blast furnace technology becomes a stranded asset in a carbon constrained economy. We have already seen the gas import hub at Port Kembla become unviable due to the sky-rocketing international gas prices, even before the construction of the import berth is completed. Tim Buckley, financial analyst for Institute for Energy Economics and Financial Analysis (IEEFA) was interviewed recently highlighting that "SAB Sweden and Salzgitter have each pledged to phase out all three of their blast furnaces by 2030 and 2033, respectively. ArcelorMittal will also be phasing out three of its five blast furnaces by 2030."¹² Australia will be left exposed if we don't adopt innovative and efficient low emissions industrial processes.

Also, the social impacts of climate change from committing to operate a relined blast furnace for another 20 years are not taken into account. The greenhouse gas emissions clearly degrade our Way of life, displacing Communities through flood and bushfire and storm inundation along the coast, limiting accessibility through these, and impairing our Health and Wellbeing through smoke, extreme heat and more severe and more frequent severe weather events - all negative social impacts. The Wollongong community has made it clear that we take concerns about climate change very seriously, with Wollongong City Council declaring a climate emergency in August 2019, and making a net zero emissions commitment in Council operations by 2030 as part of the Global Covenant of Mayors on Climate and Energy program.

I am also concerned about the EIS statement that "The majority of these waste streams are either reused or recycled via a range of resource recovery activities authorised by EPL 6092." Indeed EPL6092¹³ has over 100 "Discharge from pollutant stack" monitoring points and 12 "Water discharge from drain" points into various drains and Allans Creek. It's not enough to monitor the discharge of pollution It's important that this proposal, should it succeed, designs to avoid air pollution.

I am concerned that the construction assessment claim that potential air quality impacts are low risk of potential air quality impacts due to a large separation distance between

¹¹ [Media release: Community group condemns reclassification of Dendrobium Mine expansion as State Significant Infrastructure – Protect Our Water Alliance](#)

7 December 2021

¹² Major European steel manufacturers to phase out blast furnaces

<https://www.ausbiz.com.au/media/major-european-steel-manufacturers-to-phase-out-blast-furnaces-?videoid=19169>

Published by AusBiz on 8 February 2022

¹³ <https://apps.epa.nsw.gov.au/prpoeoapp/ViewPOEOLicence.aspx?DOCID=228806&SYSUID=1&LICID=6092>

construction activities and sensitive receptor, because where I have lived in Coniston and in Southern Central Wollongong we already have an issue with black dust on our window sills and balconies, and through our homes when windows are left open. I am concerned that this black particulate matter will be more prevalent during the relining process, particularly impacting my father who suffers from asthma, and my daughter who is too young for a diagnosis, but was recently hospitalised with asthma-like symptoms that respond to Ventolin.

I am also concerned that the neglect of the vegetation in the surrounding lands, particularly around Area 21, feeding into Saltmarsh EEC at Tom Thumb Lagoon and in the riparian corridor of Allans Creek are an increased biosecurity risk. Please make vegetation restoration and weed removal a condition of consent in the unfortunate situation that this project is approved.

There are only limited improvements from the current operation to the proposed reline. If this project is approved please ensure that waste gases are no longer flared to the environment. Carbon abatement can be increased through co-generation to utilise the waste heat and flammable gases that are generated as a by-product of the BF-BOF industrial processes. Should it be approved please ensure that co-generation is a condition of consent.

Thank you for taking these objections and concerns into consideration.