

Why the application by West Cumbria Mining to create a new coal mine (Woodhouse Colliery) should be decisively rejected

This would constitute a significant step forward for efforts to establish the UK as a world leader for efforts to respond to the climate emergency, by helping to build the momentum resulting from:

- **the Government's ground breaking 'Powering Past Coal Alliance', at the launch of which, on 16th Nov 2017, Rt Hon Claire Perry MP stated that *"The time for coal has passed"*;**
- **the Government's commitment to stop financing for fossil fuel projects abroad from 31st March, 2021.**

"Coal is not the future... all over the world, people have made a decision to move to cleaner fuel than coal, which is the dirtiest fuel in the world... The future is very clearly in new technologies."

(John Kerry, US Special Presidential Envoy, when asked specifically about the Cumbrian mine by the BBC's Emily Maitlis on 9th March)

"The claim that opening new coal mines helps stop climate change, because 'local coal' saves greenhouse gas emissions... is, quite simply, economic nonsense... Digging up more coal makes it cheaper... discouraging the uptake of coal-free methods to produce steel, etc. The proposals are would-be climate wreckers."

(Professor Paul Ekins OBE, Director of the Institute for Sustainable Resources, University College London)

"Very low and zero emissions from the iron & steel and cement and concrete industries is a technically and economically reasonable challenge"

(Dr Chris Bataille, OECD Green Growth Papers, No. 2020/02, OECD Publishing, Paris)

"It would be an act of extreme diplomatic delinquency to consent to any new coal mine on the eve of the COP26 summit. The UK has an obligation as host to build confidence that the world can accelerate its currently inadequate progress away from carbon dependency... I hope even now the Government will call a halt to this misbegotten proposal."

(Mr John Ashton CBE, who served three Foreign Secretaries as Special Representative on Climate Change)

"The opening of a new deep coking coal mine in Cumbria will increase global emissions and have an appreciable impact on the UK's legally binding carbon budgets..."

"It is important to note that this decision gives a negative impression of the UK's climate priorities in the year of COP26."

(Lord Deben, Chair of the Committee on Climate Change, in letter to Rt Hon Robert Jenrick MP, Secretary of State Ministry of Housing, etc., 29th January 2021)

"The threat of climate change is now so obvious and so deeply worrying that we need to be closing coal mines as quickly as possible, not opening new ones. Those pushing for the Woodhouse Colliery are either profoundly ignorant of the risks of climate change, or so blinded by money as to be a menace to our children and grandchildren."

(Professor Sir John H. Lawton CBE FRS, Former Chair of the Royal Commission on Environmental Pollution)

"The UK, as host to COP26, has a chance to change the course of our climate trajectory – or it can stick with business-almost-as-usual and be vilified...around the world.

It would be easy to achieve... ignominy and humiliation. Just continue with this new coalmine... in contemptuous disregard of the future of young people and nature."

(Professor James Hansen, NASA's former chief climate scientist, who alerted the world to global heating in 1988)

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In view of the manifest baleful national and global implications of the development of a new coal mine (Woodhouse Colliery), as proposed by West Cumbria Mining, we call for the proposal to be decisively rejected.

The colliery has become a national and international ‘*cause celebre*’, raising concern and alarm on the part of leaders ranging from the legendary scientist, Dr James Hansen; to Lord Deben, Chair of the Committee on Climate Change; and to the iconic Greta Thunberg, on account of its wider implications.

Consent for the mine would send a terrible message to British finance and industry, and to the wider world. It would stand in striking contrast to the policy of the new American administration in its approach to the exploitation of new reserves of fossil fuels – a most damaging development in view of the importance of the USA for a successful outcome of COP26 this year, which the UK will chair.

Asked specifically about the mine by the BBC’s Emily Maitlis on 9th March, US Special Presidential Envoy, John Kerry, stated that, *Coal is not the future... all over the world, people have made a decision to move to cleaner fuel than coal, which is the dirtiest fuel in the world... The future is very clearly in new technologies.*

We hope that the Government will follow up on such a decision with a commitment to provide generous investment to promote a sustainable economy in the County, something for which it is ideally situated.

Dramatic about-turn in US policy

On the first day of his presidency, President Biden signed an executive order blocking the construction of the Keystone XL pipeline and the Department of the Interior has suspended the granting of permits to drill for oil and gas on federal property. Against this backcloth, we have the consent granted by Cumbria County Council to the application by West Cumbria Mining to create a new coal mine (Woodhouse Colliery) and the Government’s decision to ‘call in’ the application and to set up a Public Inquiry to consider it.

As John Kerry stated, coal is the most polluting of all readily available fossil fuels and the coal from the Woodhouse Colliery, when burnt, will discharge the best part of half a billion tonnes of carbon dioxide into the atmosphere over the next 50 years.

‘There is no alternative’, to coal for steelmaking – this is demonstrably false

The principal justification for the proposal is that, *“At the moment, there’s no economic way of making steel without coking coal - there is no viable alternative”* (Mike Starkie, Mayor of Copeland, Cumbria, Note 1). On the contrary, since steel is virtually indestructible, it is increasingly being produced, even *‘at the moment’*, by the Electric Arc Furnace method and, if renewable electricity is used, this is virtually zero carbon. The U.S. now produces 70% of its steel in this way. (Note 2)

Furthermore, according to Dr Chris Bataille, in a major report produced for the OECD in 2020, *“Very low and zero emissions from the iron & steel and cement and concrete industries is a technically and economically reasonable challenge”*. (Note 3) Indeed, the steel giant SSAB *“aims to replace coking coal, traditionally used for ore-based steel making, with fossil-free electricity and hydrogen”*, and hopes to be doing so by 2026. (Note 2) This is only one of a host of examples and it is doubtless what John Kerry had in mind when, speaking about the West Cumbria mine, he said, *“The future is very clearly in new technologies.”* (Note 4)

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‘Open new coal mines to reduce emissions’ (i.e., the ‘Market Substitution’ argument) – “economic nonsense”

The justification outlined above is linked to the argument that coal from the new mine will replace that which would otherwise need to be imported, with the additional ‘carbon cost’ involved in transport of the latter. [But see note 5.] Several of the signatories of this submission have heard this before, in connection with the proposed new surface mine at Highthorn, near Druridge Bay in Northumberland. We rejected it then and do so again now.

Professor Paul Ekins OBE, Director of the Institute for Sustainable Resources at UCL, states that *“The claim that opening new coal mines helps stop climate change, because ‘local coal’ saves greenhouse gas emissions... sounds like common sense – until you ask an economist.”* It is, he says, *“quite simply, economic nonsense.”*

Professor Ekins and his colleagues have characterised this position as *“The Substitution Error”*, since, as they pointed out:

- 1. The expansion of the global coal supply will, in the absence of market features for which there is no evidence in respect of demand for coal, lead to downward pressure on the price of coal and an increase in demand for it.*
- 2. This downward price pressure will worsen the competitive position of those developing coal-free technologies in such currently carbon-intensive industries as steel and cement.*
- 3. The result of these economic forces is highly likely to be an increase in GHG emissions in both the short and long term.*

Rebecca Willis *et al.* drew the same conclusion, stating that the development of new mines would *“decrease the incentive to use coal more efficiently, recycle more steel or produce steel using alternative processes, even though all these are technically possible.”* (Note 6)

Similarly, on 7th February, 2019, Chief Judge Brian Preston dismissed an application to develop the Rocky Hill Mine, in Australia, stating that *“the greenhouse-gas emissions (GHGs) of the coal mine and its product will increase global total concentrations of GHGs at a time when what is now urgently needed... is a rapid and deep decrease in GHG emissions.”* Furthermore, as the FT stated, *“an important part of the ruling was its rejection of the ‘market substitution’ defence.”*

Mining companies conveniently ignore the obvious fact that, if we have more coal mines, whether at home or abroad, we’re almost inevitably going to produce more GHG emissions eventually – ‘More Coal Mines = More Carbon Emissions!’ The only responsible policy is to run down both the extraction and use of coal ourselves – and call on our overseas partners to do likewise.

Consent for the Woodhouse Colliery – “an act of extreme diplomatic delinquency”

Mr John Ashton CBE, who served three Foreign Secretaries as Special Representative on Climate Change, states:

“It would be an act of extreme diplomatic delinquency to consent to any new coal mine on the eve of the COP26 climate summit in Glasgow. The UK has an obligation as host to build confidence that the world can accelerate its currently inadequate progress away from carbon dependency... Now with such consent we would be declaring: ‘Do as we say, not as we do’.

“It is true that Cumbria urgently needs investment. But this project will lock it further into the shrinking carbon-based economy and hold back progress towards the major role it could play in building a carbon neutral future. But it is not too late. I hope even now that the government will call a halt to this misbegotten proposal.”

Furthermore, no less a figure than Lord Deben, Chair of the Committee on Climate Change, agrees with Mr Ashton, stating that, *“It is important to note that this decision gives a negative impression of the UK’s climate priorities in the year of COP26.*

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Doubts raised over sulphur content of Cumbrian coal

The alarm has been raised just this month that the Cumbrian coal would not be suitable for UK steelmaking, on account of its sulphur content. Indeed, according to an exclusive report in the Daily Telegraph on 1st March (Note 7), Cumbria County Council has been aware for some time that *“the level of sulphur content would need to be managed to supply a product currently suitable for British Steel, and it is not clear whether this can be achieved.”*

Conclusion

The application to create a new coal mine (Woodhouse Colliery) by West Cumbria Mining should be decisively rejected. This would constitute a significant step forward for efforts to establish the UK as a world leader for efforts to respond to the climate emergency.

This is imperative, because although decarbonising the steel and cement industries is, as Dr Chris Bataille stated in his major study for the OECD last year, *“a technically and economically reasonable challenge... clear long term policy signals are needed... to incentivise all key actors to play their parts”*. (Note 3)

We will hope that it will accompany such an approach with a commitment to substantial investment in the county in order to make it the major hub for the renewable energy industry for which it is ideally situated.

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Notes:

1. <https://www.newsandstar.co.uk/news/19058740.mayor-hits-back-international-criticism-levelled-proposed-west-cumbria-mine/#:~:text=%22At%20the%20moment%2C%20there's%20no,the%20world%20and%20importing%20it.>

2. Jeff Ferry, October 2020, <https://www.industryweek.com/the-economy/trade/article/21148048/tariffs-are-keeping-us-steel-production-strong>

3. Bataille, C. (2020), "Low and zero emissions in the steel and cement industries: Barriers, technologies and policies", OECD Green Growth Papers, No. 2020/02, OECD Publishing, Paris.

4. "John Kerry on the US fight against climate change." BBC2, 9th March 2012.
<https://www.bbc.co.uk/events/eqbxj5/play/p0994gqk>

5. It has *not* been established that the *overall* level of emissions resulting from use of coal mined at the Woodhouse Colliery would be less than those resulting from using coal from abroad. Supporters of Woodhouse are forward in citing the carbon cost of transport for coal imports (which is modest – about 1% of the total, according to Professor Phil Taylor), but less so in drawing attention to the substantial emissions generated by developing a new deep mine and the (probably) lower carbon cost of extraction by the massive, opencast operations which characterise, for example, many Australian mines.

6. Rebecca Willis, Mike Berners-Lee, Rosie Watson and Mike Elm (2020), "The case against new coal mines in the UK", Green Alliance, London.

7. "Exclusive: Case for Cumbrian mine undermined by doubt over UK market for coking coal. Sulphur content of the coal could mean British companies are unable to use it." (Emma Gatten), Daily Telegraph, 1st March.
<https://www.telegraph.co.uk/environment/2021/03/01/case-cumbrian-mine-undermined-doubt-uk-market-coking-coal/>