

Rt Hon Michael Gove MP Secretary of State Department for Levelling Up, Housing and Communities 2 Marsham Street London SW1P 4DF

26 April 2022

Dear Secretary of State,

PROPOSED WHITEHAVEN COAL MINE

We are writing as the chief executives or senior representatives of 14 environmental NGOs and other organisations to urge you to refuse planning permission for the proposed Whitehaven coal mine. We believe there are three key reasons for you to do this:

- The mine would significantly increase carbon emissions and make it harder to secure the global agreement needed to 'keep 1.5 degrees alive'
- It is far from clear that there is a long- or even medium-term demand for the coal that would be produced by the mine.
- Opening a new coal mine is not the way to create long-term jobs as part of a sustainable levelling up agenda.

Climate change

Opening the mine would lead to an increase in global carbon emissions and, according to the Chair of the Climate Change Committee, would have an appreciable impact on the UK's legally-binding carbon budgets¹.

Granting planning permission and allowing the mine to open would run counter to the conclusions of the International Energy Agency (IEA) that, if the world is to reach net zero emissions by 2050, then no new oil and gas fields or coal mines are required² and to the statement of UN Secretary General António Guterres that countries should end all new fossil fuel exploration and production³.

Granting planning permission for the mine would also harm the prospects of 'keeping 1.5 degrees alive', as the Prime Minister exhorted the world to do at COP 26. As you know, the UK holds the presidency of COP until November 2022, and so is at the heart of negotiations. Given the priority that the UK placed at COP 26 on 'consigning coal to history' and the progress made since then, the strength of the UK's negotiating position and our ability to persuade others to take the action needed will be severely weakened if the coal mine is permitted – it would risk being a case of 'do as we say, not as we do'.

Friends of the Earth Limited Registered in London No 1012357

Need for coal

The European steel industry is investing heavily in greener production methods, such as using hydrogen. The direction of travel is clear - it is moving away from the use of coal - and the speed of the change is increasing. For example, ArcelorMittal has said that its Sestao site in Spain will be the world's first full-scale zero emissions steel plant⁴; Tata Steel has announced that its IJmuiden steel plant in the Netherlands will not in the future use coal with carbon capture and storage, as had originally been planned, but will instead move to using hydrogen⁵; and German firm Salzgitter has said it will move fully to hydrogen and renewable energy-based steelmaking by 2033⁶.

The Climate Change Committee has stated that 'coking coal use in steelmaking could be displaced completely by 2035, using a combination of hydrogen direct reduction and electric arc furnace technology'⁷. We believe that this would provide a much more secure future for the UK steel industry.

At the public inquiry, an expert appearing for West Cumbria Mining accepted that there is only a long-term demand for the coal that the mine would produce in a future in which countries are not meeting Paris Agreement targets. We believe that this is clearly a future which cannot be allowed to happen and which the UK, along with other countries in Europe which form the main target market for the Cumbrian coal, have committed to work to avoid⁸.

Cumbrian coal would not replace imports from Russia: West Cumbria Mining are clear that its coal would replace imports from the US⁹. Nor would mining coal in Cumbria mean that coal for steel production in the UK would no longer need to be imported. Steelmakers use a blend of coal rather than just one source. In hypothetical examples produced by West Cumbria Mining, its coal would make up at most 20% of blends used by a typical European steel maker, with the remainder still imported, including 55% from Australia¹⁰.

Jobs

We do not believe that opening the Cumbrian mine is the way to create long-term and sustainable jobs because, as is explained above, there are real doubts about the medium-and long-term demand for its coal. Your department also has responsibility for levelling up – this is a critical part of the government's agenda and the best way to achieve it is in a way which is joined up with other government priorities, such as tackling the climate crisis.

Cumbria, and West Cumbria in particular, needs new jobs and economic investment. Areas like West Cumbria should be at the forefront of government plans to transform our economy, create new jobs and build the cleaner future we so urgently need. According to the Local Government Association, there is potential for over 6000 green jobs in Cumbria by 2030, in areas such as energy efficiency, solar power, offshore wind and low carbon heating¹¹. Almost 600 of these could be in Copeland, the area where the mine would be built¹².

Opinion polling for Green Alliance¹³ has shown that people want the government to focus on investment in new low carbon industries, and on transitioning carbon emitting industries into low carbon industries, rather than in existing or new carbon-emitting industries. This is true for all respondents, for 2019 Conservative voters and for people in the North of England. This can be seen to apply not just to the Cumbria coal mine, but also to the UK steel industry, which it would supply. The polling also shows that opening a new coal mine is more likely to make

people feel negative rather than positive about the direction the UK is going in. Again, this is true for all respondents, for 2019 Conservative voters, and for people in the North of England.

We urge you to refuse planning permission for the Cumbria mine, and to work with colleagues to provide green jobs in West Cumbria and a green future for the UK steel industry.

If you require any further information or would like to meet to discuss this issue, then we would be very happy to help.

Yours sincerely,

Miriam Turner & Hugh Knowles Co-Chief Executive Officers

1 Knoles

Friends of the Earth England, Wales & Northern Ireland

On behalf of

Shaun Spiers Executive Director Green Alliance

Pat Venditti Interim Chief Executive Greenpeace

Katie-Jo Luxton
Director of Global Conservation
Royal Society for the Protection of Birds

Tom Fyans
Deputy Chief Executive
Campaign to Protect Rural England

Shane Tomlinson Acting Chief Executive Officer E3G

Craig Bennett
Chief Executive Officer
The Wildlife Trusts

Richard Benwell
Chief Executive Officer
Wildlife & Countryside Link

Darren Moorcroft Chief Executive Officer Woodland Trust

Dhananjayan Sriskandarajah Chief Executive Officer Oxfam GB

Kyle Lischak Head of UK Client Earth

Steve Trent
Chief Executive Officer
Environmental Justice Foundation

Duncan Law
Acting Co-Chief Executive
Community Energy England

David Cowdrey
Director of External Affairs
MCS Charitable Foundation

² IEA 'Net Zero by 2050: A Roadmap for the Global Energy Sector' https://www.iea.org/reports/net-zero-by-2050 p51

p51
³ United Nations, 9 August 2021, 'Guterres: The IPCC Report is a code red for humanity' https://unric.org/en/guterres-the-ipcc-report-is-a-code-red-for-humanity/

- ⁴ ArcelorMittal, 13 July 2021, 'ArcelorMittal Sestao to become the world's first zero carbon-emissions steel plant' https://corporate.arcelormittal.com/media/press-releases/arcelormittal-sestao-to-become-the-world-s-first-full-scale-zero-carbon-emissions-steel-plant
- ⁵ S&P Global, 21 September 2021, 'Dutch CCS project scrapped after Tata Steel opts for hydrogen DRI production route' https://www.spglobal.com/platts/en/market-insights/latest-news/electric-power/092121-dutch-ccs-project-scrapped-after-tata-steel-opts-for-hydrogen-dri-production-route
- ⁶ Argus Media, 7 February 2022, 'Steel decarbonisation gathers speed'

https://www.argusmedia.com/en/news/2299399-steel-decarbonisation-gathers-speed

- ⁷ Climate Change Committee, 29 January 2021, 'Letter: Deep Coal Mining in the UK' https://www.theccc.org.uk/publication/letter-deep-coal-mining-in-the-uk/
- ⁸ Whitehaven coal mine public inquiry, Friends of the Earth closing statement paras 14-16 https://cumbria.gov.uk/elibrary/Content/Internet/538/28159/44456104656.pdf (pdf p1742)
- ⁹ Wood Mackenzie, 10 August 2021, 'Steel and Metallurgical Coal Expert Report Prepared for West Cumbria Mining' para 2.34 p410 https://cumbria.gov.uk/elibrary/Content/Internet/538/28159/44426115622.pdf ¹⁰ *ibid* pages 412-413 tables 2.4, 2.5 and 2.6
- ¹¹ Local Government Association, 'Local green jobs accelerating a sustainable economic recovery': data for Cumbria, <a href="https://lginform.local.gov.uk/reports/view/lga-research/estimated-total-number-of-direct-jobs-in-low-carbon-and-renewable-energy-sector?mod-area=E10000006&mod-group=AllCountiesInCountry_England&mod-type=namedComparisonGroup
 ¹² Local Government Association, 'Local green jobs accelerating a sustainable economic recovery': data for
- ¹² Local Government Association, 'Local green jobs accelerating a sustainable economic recovery': data for Copeland, <a href="https://lginform.local.gov.uk/reports/view/lga-research/estimated-total-number-of-direct-jobs-in-low-carbon-and-renewable-energy-sector?mod-area=E07000029&mod-group=AllDistrictInRegion NorthWest&mod-type=namedComparisonGroup
- ¹³ YouGov/Green Alliance Survey Results, October 2021, https://docs.cdn.yougov.com/xdruo5fix1/GreenAlliance_UKInvestment_211004_W.pdf

Friends of the Earth Limited Registered in London No 1012357

¹ Climate Change Committee, 29 January 2021, 'Letter: Deep Coal Mining in the UK' https://www.theccc.org.uk/publication/letter-deep-coal-mining-in-the-uk/