

Yara Pilbara Fertilisers – 'Renewable' hydrogen project proposal

Public consultation closes 10 May 2021 – have your say to protect Murujuga's rock art and our shared heritage. Please make a submission at:

<https://consultation.epa.wa.gov.au/open-for-submissions/ammonia-plant-murujunga-add-info/>

Points you might include in your submission; please reword these for more impact!

Introduction

Companies should be commended for replacing fossil fuel energy with renewable energy sources such as solar. **However, we are very concerned that the proposal by Yara Pilbara Fertilisers to establish a commercial demonstration pilot plant on Murujuga (Burrup Peninsula), using solar-generated electricity to produce hydrogen for ammonia production, will have an unnecessary and substantial impact on the unique petroglyphs of Murujuga .**

The renewable 'green' component of Yara's pilot project is extremely small (0.4%) and there is essentially no timeline for scaling up to produce the large amount of renewable hydrogen that would be required annually for the Yara Fertiliser plant. As it now stands, this appears to be 'greenwashing' for a project that will primarily depend on burning natural gas for years into the future. Gas is a major source of high levels of carbon dioxide and methane, as well as sulphur dioxide and nitrous oxides that are particularly damaging to the unique Murujuga petroglyphs.

It is disturbing although unsurprising that the proposal has the support of the Western Australian Government, which allocated \$2 million in January 2021 to the project. Similarly, Yara gained substantial positive publicity when Prime Minister Morrison visited the site on 16 April 2021. In early 2020, the project was granted \$995,000 from the Federal Government's, taxpayer-funded Australian Renewable Energy Agency (<https://arena.gov.au/news/the-pilbara-looks-to-renewable-hydrogen/>). **Is this how we want our tax dollars to be spent?**

FARA contends that the EPA should not approve the Yara Pilbara Renewable Hydrogen Project on Murujuga as it is currently proposed for these 4 reasons:

1. The solar panels will be a visual desecration of a world unique Aboriginal Heritage site, located adjacent to a national park

The proposed site for the pilot solar array and infrastructure is surrounded on three sides by Murujuga National Park. Noise and truck traffic, during construction and ongoing hydrogen production, will impact visitors to Ngajarli (Deep Gorge) and Hearson Cove. The land is currently undeveloped and in the middle of the world unique rock art landscape with engravings that show >50,000 years of continuous culture and spiritual beliefs of Indigenous Australians.

Solar panels and associated infrastructure in the midst of this globally significant rock art gallery will be an enormous and unnecessary distraction that further degrades the integrity of the cultural landscape, and destroys more natural habitat for native flora and fauna by nearly doubling the land to be cleared.

The cultural interconnections between the Murujuga petroglyphs and standing stones, from valley to valley and ridge to ridge, would be disrupted by the presence of c. 25 hectares of solar infrastructure and the reflections and glare from the solar panels.

Further industrial development at this site will unnecessarily detract from the natural, spiritual and cultural significance of the area.

Yara's proposal to erect the solar/hydrogen infrastructure at this location is another example of desecration of Australia's extraordinary Indigenous heritage for minimal short-term financial gain. This affront is particularly disgraceful when there are alternative locations, including the Maitland Industrial Estate which was purposefully set aside for industry. There, the generated electricity could be used to produce hydrogen for ammonia production and then be transported to the nearby Yara Pilbara Fertiliser plant with little extra cost and without negatively impacting the experiences of users and visitors to Ngajarli and Hearson Cove.

Although the Senate Inquiry into the destruction of the Juukan George caves recently said: ***Never Again!***, approval of Yara's proposed site in the midst of the Murujuga rock art gallery would seem to say: ***We, the State and Federal Governments, don't really care about preservation of our ancient heritage – let's do it again!***

2. This project will have minimal economic value to Australia and is NOT primarily a green initiative – it is 'greenwashing'

Yara's pilot 'green' hydrogen plant will provide only 0.4% of the hydrogen needed for annual production of ammonia – the remaining 99.6% of required hydrogen will be produced using natural gas. ***Importantly***, the Yara proposal does not mention a timeline for scaling up to produce more green hydrogen and there is no firm commitment built into the proposal. Instead the proposal "*will provide a demonstration-scale project to catalyse the global journey of decarbonising ammonia production*".

If Yara is serious about providing solar-generated hydrogen for producing most of its fertiliser, it will require a substantial area of land (>6000 hectares) for the very large number of additional solar panels that would be required. However, the current proposal does not indicate where these would be located.

Yara should show its commitment to providing green hydrogen for the entire project by putting the pilot plant in a suitable alternate location, rather than where it will visually degrade the National Heritage Listed area near Njagali and Hearson Cove, an area which has also been tentatively listed for World Heritage status. The EPA should question this obvious shortcoming in the proposal, and ask Yara to resubmit a proposal with the capacity to produce solar-generated hydrogen for their entire operation, or at least as much larger percentage.

Yara's proposal seems to be intended to improve their social licence and obtain government funding through promotion of their 'green hydrogen' project. This is not surprising knowing Yara International's reputation for '**GREENWASHING**', as evidenced by it being twice awarded in the *Prix Pinocchio du Climat* 'Greenwashing' Award in Paris. The award illustrates and denounces the negative impacts of multinational companies that whitewash themselves with 'green' talk. **There is a wide gap between the virtuous corporate image projected by Yara and the reality of its actions on the Burrup.**

What is the value of Yara to Australia? Does it really provide money and jobs?

Financial return: Yara International had an annual turnover of \$US 12.9 billion in 2019. Yara Australia Pty Ltd was reported to have paid **NO** Australian taxes in 2017-18, despite earning \$386,892,232 (<https://www.abc.net.au/news/2019-12-12/ato-corporate-tax-transparency-data-companies-no-tax-paid/11789048?nw=0>).

People employed: Yara Pilbara Fertiliser states that the plant 'provides employment for approximately 100 production and administrative staff'

(<https://www.yara.com.au/about-yara/about-yara-australia/pilbara/yara-pilbara-fertilisers/>).

This employment is miniscule and certainly does not provide long-term 'jobs, jobs, jobs' as we are told by governments. If this information about taxes paid and job numbers is true, **Australian citizens are paying through our taxes for Yara to be in Australia, degrading our ancient heritage! Where is the logic?**

3. Persistence of long-term acidic industrial emissions that are destroying the petroglyphs

Yara's Burrup plants are responsible for high levels of acidic emissions of nitrogen and sulphur oxides that will continue into the future given the current levels of emission approved in licences granted by the Western Australian Government on **20 April 2020**. The cumulative emissions from these plants will be disastrous for long-term preservation of the petroglyphs and the cultural heritage they represent.

Producing hydrogen using renewable electricity to replace natural gas does NOT reduce the acidic emissions of the fertiliser plant. Instead it would mean that the Yara Ammonia and Ammonium Nitrate plants can continue to emit acidic sulphur and nitrogen oxides indefinitely into the future. Yara's acidic emissions, along with those from industry and shipping, have already increased the acidity of some rock surfaces by over 1,000-fold since industrialisation. Published scientific papers show that increased acidity is dissolving the outer patina needed for preservation of the petroglyphs.

The licences granted to Yara by the WA Government permit levels of emissions that over the long-term will destroy the petroglyphs, despite Yara International having technology that can reduce their emissions to virtually zero. Yara International run other ammonium nitrate plants globally that have lower emissions than the Burrup plant, which demonstrates that stricter emissions control limits are possible and practicable. Industries responded when the Norwegian government announced taxes on their emissions of nitrous oxides (in 2007), because of their extreme detrimental effects on human health.

4. Ongoing dependence on gas from Woodside will result in unacceptable greenhouse gas emissions

Yara's proposal states that **99.6% of the hydrogen for the fertiliser plant will be produced from natural gas (with no projected date of when this % will be reduced), which means that Yara's business plan is integrally dependent on gas from Woodside.** Importantly, Woodside's 2018 assessment states that by processing Scarborough gas, it will extend the life of the Pluto LNG facility and supply domestic and export markets from mid 2020s – indicating that without Scarborough, there would be insufficient gas supply. **However, the Scarborough gas project remains uncertain due to lack of environmental approvals, unbuilt infrastructure (which will potentially damage marine sanctuaries), and unsecured investment funding. As a result, Yara's proposal is equally uncertain because it is primarily reliant on natural gas for the foreseeable future.**

Significantly, there is mounting criticism of Woodside – by its shareholders, insurance and superannuation companies, the public and others – for its huge contribution to Australia's greenhouse gas emissions (GHG). These are currently estimated at about **16% of the total GHG release from Australia** (although it is recognised that some scope 3 emissions will occur in other countries).

If the Burrup Hub is approved, the GHG emissions will increase by the equivalent of 4X the proposed Adani project. The Conservation Council of WA suggests that the figures presented by Woodside are a gross underestimation and that instead the total GHG emissions from the Burrup Hub will be equivalent to 23.7% of Australia's GHG production.

In order to properly assess the true environmental impacts of Yara's 'green hydrogen' proposal, the EPA must consider all emissions from Yara as part of the cumulative emissions on the Burrup, alongside gas developments proposed to be processed at the Burrup Hub complex.

Summary

To date, **economic considerations have greatly outweighed all others when industrial developments are assessed, despite community interest in preserving our shared environmental resources, protecting cultural heritage for future generations and preserving biodiversity** (<https://www.theguardian.com/environment/2015/aug/12/australia-has-denied-environmental-approval-to-just-11-projects-since-2000>).

We have seen that **the Commonwealth EPBC Act is 'ineffective' for protecting our environment and Aboriginal heritage** (words of the Samuel Report), and we know that the **EPBC has proved weak in enforcing compliance** with licence conditions and effectively prosecuting companies for breaches. Instead, it has relied on a **'conciliatory approach to non-compliance'** which will certainly not ensure preservation of the Murujuga petroglyphs!

Given this regulatory background, and the dubious claims that this is a 'green' hydrogen proposal, we urge the EPA to comprehensively assess and evaluate Yara's proposal in the first instance using the Precautionary Principle, not after the damage has been done.

Please make your concerns known about the fallacy of Yara Pilbara Fertilisers 'Renewable' hydrogen proposal – it is time to act to protect our heritage!

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