

POSCO

Port Hedland Green Steel Project

Decarbonisation Project

Emissions Assessment

Document No. 207127-0000-DC00-RPT-0002 June 2024

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1 Executive Summary

The Port Hedland Green Steel (PHGS) opportunity is a joint venture between POSCO (POSCO), Marubeni Corporation (Marubeni), and China Steel Corporation (CSC) on behalf of Port Hedland Green Steel Pty Ltd (PHGS). PHGS, which is wholly owned by POSCO, is a special purpose company formed to develop a largescale downstream iron ore processing facility at the Boodarie Strategic Industrial Area (BSIA) in Port Hedland, Western Australia (the "Project").

The Project will process magnetite concentrate from iron ore operations in the Pilbara to produce hot briquetted iron (HBI) for export to customers who will convert the HBI into a low-carbon emission steel overseas.

The Proposal is located in the BSIA approximately 8 km west of South Hedland town site and approximately 12 km south of Port Hedland town site.

The Project will be developed in stages. Stage 1 will involve the design and construction of an HBI plant, consuming approximately 3-3.5 Mt/a of iron ore. The first processing step is to produce iron ore pellets (3- 3.5 Mt/a). Most of the pellets will be fed into the HBI plant to produce approximately 2 Mt/a HBI. The remainder of the pellets (~0.7 Mt/a) will be sold and exported. The exported pellet and HBI will be shipped to POSCO in South Korea, China Steel in Taiwan, and steel mills in Japan.

PHGS has requested the Wood Decarbonisation Team to assess the Scope 1, 2, and 3 emissions (in tCO_{2e}/tHBI product) that can be expected from the Port Hedland Green Steel Project on an average annual basis for Stage 1, based on the information available in June 2024. This includes emissions over the construction phase, ramp-up period, and Stage 1 of the operation phase. The life-of-asset (LOA) for Stage 1 was reported to be 99 years.

Wood has calculated a Baseline Emissions Assessment, which is representative of the scenario where no carbon abatement options are incorporated into the PHGS. The implication of carbon abatement opportunities including hydrogen (H2) injection carbon capture and storage (CCS), electrification of vehicles and machinery, as well as a higher uptake of renewables in the electrical grid were assessed on the Project product emission intensity. These two studied cases are referred to as the Base Case and Low-carbon Case in the report.

The following results have been obtained from the Baseline and Low-carbon case emissions assessment:

- Emissions assessment over the construction years:
	- \circ Total Scope 1 emissions over the construction period is 179,231 tCO_{2e}.
	- o No grid connection is envisaged during connection years, therefore Scope 2 emissions equal to zero.
	- \circ Total Scope 3 emissions over the construction period is 448,341 tCO_{2e}.
	- o No carbon abatement opportunities have been considered for construction years.
	- \circ The ramp-up period has been merged with the construction years when reporting emissions over the whole life time of the project., as it is only a quarter commencing right after construction in Q4-2029.
- Emissions assessment over the operation years:
	- \circ Total Scope 1 baseline emissions over the operation period is 111,486,086 tCO_{2e}.
	- \circ Total Scope 2 baseline emissions over the operation period is 33,093,285 tCO_{2e}.
	- \circ Total Scope 3 baseline emissions over the operation period is 510,055,067 tCO_{2e}.

- o Integration of green hydrogen, carbon capture and storage, and fleet electrification reduces the total Scope 1 emissions by 84% to 18,352,279 tCO_{2e}. This corresponds to the Scope 1 emissions intensity of 0.55 tCO_{2e}/tHBI and 0.08 tCO_{2e}/tHBI for baseline and Low-carbon case emissions assessment, respectively.
- o Higher uptake of renewable energy, as committed / agreed by power suppliers, reduces total Scope 2 emissions to 2,245,007 tCO_{2e}, corresponding to 93% emissions reduction.
- o No emissions abatement opportunity assessment has been conducted for Scope 3 emissions. Fleet electrification will decrease diesel consumption (Scope 3 – Purchased goods and services) and the use of renewable energy will lead to a lower Scope 3 – Fuel and energy, however, the impact will be marginal (<0.5% reduction).
- \circ The HBI baseline emissions intensity for Scope 1 and 2 is 0.70 tCO_{2e}/tHBI, which is well below the reported Safeguard Mechanism best practice benchmark emission intensity of 1.77 $tCO_{2e}/unit$, where the unit is tonnes of metallic iron products. The implementation of abatement opportunities reduces the HBI emissions intensity to 0.08 tCO_{2e}/tHBI (Scope 1 and 2 emissions).
- o Total emissions intensity (Scope 1, 2, and 3 emissions) for baseline and low-carbon cases are 2.57 tCO_{2e}/tHBI and 1.94 tCO_{2e}/tHBI, respectively.
- The emissions intensity of pellet product is 0.07 tCO_{2e}/tPellet for Scope 1 and 2. Inclusion of Scope 3 increases the pellet emissions intensity to 1.99 tCO_{2e}/tPellet.

The total carbon emissions over the construction years and the emissions over the operating phase (for one average year and LOA) are shown in [Figure 1.1](#page-10-0) to [Figure 1.7](#page-15-1) and in [Table 1.1.](#page-15-0)

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Figure 1.1: Total Emissions (ktCO2e)– Construction and Ramp-up Phases

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Figure 1.2: Average Annual Emissions (ktCO2e/a)– Operating Phase (Base Case)

Figure 1.3: Decarbonisation over LOA (ktCO2e)– Low Carbon Case Operations (Scope 1 and 2 Emissions)

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Figure 1.6: Average Annual Carbon Intensity (tCO2e/tHBI) (Scope 1, 2, and 3)

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¹ Operation emissions only – excludes emissions from the construction and ramp-up phases

² Emissions during construction phase are from the pellet production which starts during the last year of the construction phase in CY29

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Abbreviations

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2 Introduction

The steel industry consumes 5.9% of global energy and emits 6-9% of global $CO₂$ emissions. Moreover, the world has seen an unprecedented increase in steel demand since the industrial revolution and that demand is expected to rise to 1.5 times the current demand in the next 30 years [1]. These facts set the tone for decarbonising the steel-making processes so that the steel industry can maintain its eminent presence in a low-carbon world.

Globally, POSCO is the $7th$ largest steel manufacturer producing 38.64 Mt of crude steel (in 2022) from two steel mills located in Pohang and Gwangyang in South Korea [2]. POSCO recognise that greenhouse gas (GHG) emissions are a global issue that requires a global solution. POSCO has committed to decarbonising their steel manufacturing processes by implementing green technologies to achieve net zero GHG emissions by 2050.

To progress towards this target, POSCO propose to change the way steel is produced for a portion of their South Korea-based Making Operations (SMO). POSCO will systematically replace a portion of their existing blast furnaces (BF) with electric arc furnaces (EAF) which can be operated using renewable energy technology (as opposed to the combustion of fossil fuels as required for the BF; Proposal). POSCO proposes to develop the PHGS project which will produce hot briquetted iron (HBI), a suitable feedstock for steel manufacturing using EAF. HBI can be produced using natural gas or hydrogen (or a blend of both) as a reducing agent, instead of coking coal which is used in POSCOs current BF-based processes. The Proposal has the potential to significantly reduce the GHG emissions intensity of the SMO.

PHGS have identified Western Australia as a prime location for producing HBI due to its proximity to highquality iron ore (feedstock), potential for renewable energy and green hydrogen production, as well as access to import and export infrastructure.

2.1 Port Hedland Green Steel Project

PHGS is a joint venture between POSCO Holdings Inc, Marubeni Corporation, and China Steel Corporation (jointly referred to as the JV Parties). The JV Parties are evaluating the feasibility of developing the PHGS, a large-scale downstream iron ore processing facility at the Boodarie Strategic Industrial Area (BSIA) in Port Hedland, Western Australia (WA). The BSIA is approximately 10 km southwest of Port Hedland in the Pilbara region. The Proposal's regional location is shown in [Figure 2.1.](#page-21-1)

The Project will process magnetite concentrate from iron ore operations in the Pilbara to produce HBI for export to customers who will convert the HBI into a low-carbon emission steel overseas.

The Project will be developed in stages. Stage 1 will involve the design and construction of a HBI plant, consuming approximately 3-3.5 Mt/a of iron ore. The first processing step is to produce iron ore pellets (3-3.5 Mt/a). Most of the pellets will be fed into the HBI plant to produce approximately 2 Mt/a HBI. The remainder of the pellets (-0.7 Mt/a) will be exported from the port as pellets. HBI export volume will be relatively small (2 Mt/a for Stage 1 to 10-13 Mt/a for Stage 6) compared to total iron ore exports through Port Hedland. The disturbance footprint for Stage 1 of the Project will likely be around 390 ha within the BSIA.

Figure 2.1: Project Location

2.2 Project Schedule

The project schedule used in this study is provided in [Figure 2.2.](#page-22-1) The following assumptions have been made with regarsds to the project schedule:

- The second option of the staggered scenario has been used throughout the study as project schedule for different phases of the Project
- Construction starts from April 2026. This will be the construction for the pellet plant and the construction of HBI plant will not be commenced until January 2027.

- The construction, pre-commissioning and commissioning have been grouped together as the construction phase, as there will be no production during these phases. By merging these phases, construction will continue for 43 months. During this period, there will be some pellet production which has been taken into account in calculations.
- HBI plant will ramp-up from middle of October 2029 till middle of January 2030 (3 months). During this period, HBI plant will be in full production.
- Operation phase starts from January 2030.

Figure 2.2: Project Schedule for the Pellet and HBI Plant

2.3 Purpose and Scope

PHGS have requested the Wood Decarbonisation Team to assess the Scope 1, 2, and 3 emissions (in tCO_{2e}/tHBI product) that can be expected from the Project over Stage 1 of the operation phase (99 years), based on the information available in June 2024. This includes emissions over the construction phase and the operating phase.

The report aims to support applications for approval and discussion with the Australian Commonwealth and WA State Government.

Wood has calculated a Baseline Emissions Assessment, which is representative of two scenarios, with and without carbon abatement options, incorporated into the Project.

3 Emissions Assessment – Description

PHGS have requested a **Baseline Emissions Assessment** for the Project in WA.

This section describes the system boundaries of the Emissions Assessment of the Project including the activities that are included or excluded from the assessment.

3.1 System Boundary

The battery limits of the Emissions Assessment are shown in [Figure 3.1,](#page-23-2) with the assessments including Scope 1, 2, and 3 emissions from:

- Pellet plant
- HBI plant
- All associated non-process infrastructure $(NPI)^1$ $(NPI)^1$ designed to support the Project.

The basis of the Emissions Assessment calculation will be each year of operation, reported in tonnes $CO₂$ equivalent (CO_{2e}) per annum.

 CO_{2e} will account for all relevant GHG emissions listed under the United Nations Framework Convention on Climate Change and Kyoto Protocol [3], [4]. However, the most common GHGs – carbon dioxide, methane, and nitrous oxide – will be the focus of the assessment, see [Appendix B](#page-98-0) for the methodology.

Figure 3.1: Port Hedland Green Steel Project System Boundaries

 1 The non-process infrastructure includes water (raw, process, potable, firewater), steam, cooling towers, compressed air, fuel (diesel), facilities (office, workshop, ablution, control room, gatehouse, warehouse, storage, etc.)

3.2 Organisational Boundaries

In this assessment, the Project is treated as an isolated operating division of PHGS, 100% owned and operated by PHGS (POSCO 51%, Marubeni 24.5% and CSC 24.5%).

The projects in WA (or other locations) that PHGS has planned or proposed are not considered in this Emissions Assessment.

3.3 Operational Boundaries

The Project is treated as an isolated operating facility in the Port Hedland area of WA.

The Emissions Assessment will include Scope 1, 2, and 3 emissions from the pellet plant, HBI plant, and all the associated non-process infrastructure that has been designed to support the Project.

It is assumed that the Project facilities will be owned, controlled, leased, or operated by PHGS at the Project site, where the magnetite concentrate and reagents will be received and the HBI and pellets will be dispatched.

The battery limits for this study begin at the facility described above and end at the Project area boundary, as shown in [Figure 3.1.](#page-23-2)

PHGS's planned or proposed future development of the Project, including future stages, is not included in this assessment.

PHGS's other facilities outside of the Project (e.g. offices in Perth, etc.) are not included in this assessment.

3.4 Inclusions

The Emissions Assessment will include the following Scope 1, 2, and 3 emissions from the operation of the Project as designed, as of June 2024:

- Physical or chemical processing
- Stationary combustion (on-site generation of electricity, heat or steam, fire water pump, and bore pumps)
- Mobile combustion (transportation of materials and products)
- Land clearance
- Biogenic impact of sewage treatment and solid waste
- Emissions from the generation of purchased electricity
- Manufacturing of reagents used in the Project
- Capital goods
- Fuel and energy-related activities not included in Scope 1 or Scope 2
- Upstream transportation of reagents and feed
- Waste generated in operations
- Employee commuting

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- Downstream transportation of products
- Processing of the HBI and pellets.

3.5 Exclusions

Scope 3 emissions that were considered immaterial or not applicable have been excluded from the assessment. This includes:

- Business Travel
- Upstream leased assets
- Use and end-of-life treatment of sold products
- Downstream leased assets
- Franchises and investments.

Fugitive emissions – e.g. equipment leaks from joints, seals, packing, and gaskets; hydrofluorocarbon (HFC) emissions during the use of refrigeration and air conditioning equipment; and methane leakages from gas transport have also been excluded from this assessment.

3.6 Assumptions

A baseline emission assessment will be evaluated over Stage 1 of the Project. An additional scenario has also been included to evaluate the impact of carbon abatement opportunities (H₂ substitution and CCS) and other options such as electrified vehicles and a higher uptake of renewables in the electrical grid. This scenario is named the Low-carbon Case. [Table 3.1](#page-27-0) below summarises the assumptions made for the Base Case and the Low-carbon Case.

It should be noted that the assumptions related to timelines are reliant on the best estimates for project approval and hence may vary from those stated in this report.

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4 Baseline Emissions Assessment – Results

The balance of this report presents the PHGS Project carbon intensity data in the format prescribed by the World Economic Forum's Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard (GHG Protocol Corporate Standard) [5].

4.1 Scope 1 Emissions

Scope 1 GHG emissions are defined as the emissions from sources the reporting company owns or controls. The Scope 1 emissions of the PHGS are summarised in this section.

4.1.1 Land Clearing

The extent of land disturbance required for the Project and associated infrastructure and facilities has been estimated. The impact of the clearance is due to the loss of carbon sinks associated with land clearing.

The development envelope is 500 ha and up to 390 ha of disturbance is proposed. This includes an additional 90 ha clearing required for the establishment of the corridors. The Project is located in BSIA approximately 10 km southwest of Port Hedland in the Pilbara region. The indicative footprint and development envelopes are shown in [Figure 4.1.](#page-40-0)

A land clearance emission factor of **78.52 tCO2e/ha** was used to calculate the overall land clearance emissions, outlined in [Table D1](#page-107-0).1 in [Appendix D.](#page-106-0) This factor is an estimate from the full carbon accounting model (FullCAM) and is based on the Project being in a vegetation area of mainly hummock grasslands and eucalypt open woodlands.

The overall emissions due to land clearance is 30 623 tCO_{2e} for Stage 1 of the Project. The clearance schedule is assumed to be in the first construction year (2026), as shown in [Table D1](#page-107-1).2 in [Appendix D.](#page-106-0)

4.1.2 Process Emissions

Based on the information provided by Primetal for the HBI plant, there are six point sources from which GHGs are emitted [\(Figure 4.2\)](#page-42-0). GHG emissions from the pellet plant is discharged through the main stack [\(Figure 4.3\)](#page-43-0). The emissions will be the result of limestone reactions and natural gas combustion. All point source emissions reported here are the combined emissions from burning natural gas (NG) and embodied carbon of the reagents emitted during the process. The identified point source emissions in the HBI plant and pellet plant are listed below.

Point Source 1 – Flue Gas Stack – This is the main source of process emissions in the HBI plant. Flue gas is withdrawn from the reformer in two flue gas headers located on either side of the reformer and is released into the atmosphere. The flue gases leaving the reformer at a temperature of about 1150°C are fed to the recuperator for waste heat recovery. $CO₂$ is emitted as a result of using natural gas as the reducing agent in the Midrex process.

Point Source 2 – Bottom seal gas dedusting – The bottom seal gas system supplies and exhausts seal gas for sealing the bottom of the shaft furnace. The bottom seal gas is vented through the product discharge chamber (PDC) vent line, collected in the dilution hood, cleaned in the dust collection scrubber, and exhausted through the bottom seal dust collection fan and stack. The hood captures sufficient air to maintain a mixture of gases that remains below minimum explosive limits in the dust collection system. The gas stream exhausted from the stack is mainly composed of CO and CO2.

Point Source 3 - Briquetter dedusting- The dust collection system is designed to minimise the escape of dust at the briquette machines. The gas passes through a venturi scrubber and then is pulled by the exhaust fan and discharged into the atmosphere through the stack.

Point Source 4 and 5 – Degasser -Top Gas Weir Drain and Cone Drain– The top gas scrubber receives hot, dust-laden gases from the furnace. The degasser system (CO₂ stripper) is used to liberate dissolved gases from the top gas scrubber weir drain and cone drain water.

Point Source 6 – Degassing unit Process Water Clean– The degasser unit is used to liberate dissolved gases from the reformed gas cooler and sealed gas cooler.

Point Source 7 – Main Stack – GHG gases generated during limestone addition and natural gas combustion are channelled to the main stack and subsequently released into the atmosphere. The quantity of GHG emissions varies based on the ore source, whether it is Ridley or FMG Iron Bridge. For the purposes of this study, it is assumed that the iron ore exclusively originates from FMG Iron Bridge, known to be the most emission-intensive source. This assumption is made due to the absence of a finalised decision on the iron ore supplier at the time of conducting this study.

Figure 4.2: Point Source Emissions from the HBI Plant of the Port Hedland Green Steel Project

Figure 4.3: Point Source Emissions from the Pellet Plant of the Port Hedland Green Steel Project

The annual average emissions from the process and natural gas combustion during the operation phase are shown below in [Figure 4.4](#page-44-0) and summarised in [Table D1](#page-108-0).3 in [Appendix D.](#page-106-0)

4.1.3 Process Combustion – NG

Sources of emissions from process combustion generally include boilers, heaters, furnaces, kilns, ovens, flares, thermal oxidisers, dryers, and any other equipment or machinery that combusts carbon-bearing fuels or waste stream materials.

The sources of stationary combustion in the PHGS are the areas where natural gas (NG) is used as the fuel source in pellet and HBI plants. It has been assumed that NG is supplied to the processing plant via a lateral gas pipeline with a pressure let down and metering station.

The GHG evolved as a result of NG combustion has been already taken into account in Scope 1 – Process Emissions (Section [4.1.2\)](#page-41-0). However, the calculations for NG combustion emissions reveal that approximately 88% and 98% of the total GHGs emitted from the processing plant originate from NG combustion in the pellet plant and HBI plant, respectively. The contribution of process and NG combustion to Scope 1 is shown in [Table](#page-44-1) [4.1](#page-44-1) and summarised in [Table D1](#page-109-0).4 and [Table D1](#page-109-1).5 in [Appendix D.](#page-106-0)

4.1.4 Stationary Combustion – Diesel

Diesel consumption will occur in the operation of one fire water pump and three emergency diesel generators during construction years, while four emergency diesel generators will be utilised during operational years. This consumption will either be in line with their intended operation or when conducting tests to ensure their fitness for service.

It has been assumed that the diesel fire water pump will have 1% availability (88 h/a). It has been assumed that the emergency diesel generators will be operated on the same basis to ensure operational readiness, i.e. 88 hours a year. In addition, an allowance has been made for annual operations due to power outages.

The emergency diesel generator fuel consumption has been estimated based on an average emergency power demand requirement of 3.0 MW and has been summarised in [Table D1](#page-110-0).6.

It was assumed that six borefield pumps would be in operation for both construction and operation years (Groundwater Supply Feasibility Study Report – PW_WODPOSC_R00A). The availability of borefield pumps was assumed to be 67% or 5869 hours.

Using the National Greenhouse and Energy Reporting (NGER) emissions factors for the stationary combustion of diesel, specified in [Table B1](#page-103-0).2 in [Appendix B,](#page-98-0) the CO_{2e} for the stationary combustion of diesel is summarised in [Table D1](#page-110-0).6 in [Appendix D](#page-106-0) and shown below in [Figure 4.5.](#page-46-0)

4.1.5 Mobile Combustion – Construction Vehicles

According to the Greenhouse Gas Protocol Corporate Standard, emissions from mobile equipment that is "owned or controlled" are accounted as Scope 1 emissions. That is, mobile equipment that is owned, operated, or leased for the exclusive use on the company's site is considered under the category of Scope 1 emissions.

The emissions estimation assumes that all construction vehicles use diesel. Annual consumption of diesel is either assumed values from the Wood's Database or has been collected from the vehicles' datasheet and specifications. The type of vehicles and machinery for the construction years are provided by PHSG.

Using the NGER emissions factors for the stationary combustion of diesel, specified in [Table B1](#page-103-0).2 in [Appendix](#page-98-0) [B,](#page-98-0) the CO_{2e} emissions for the mobile combustion of diesel from construction vehicles and machinery are summarised in [Table D1](#page-111-0).7 and shown below in [Figure 4.6.](#page-47-0)

Figure 4.6: Annual CO2e Emissions from Mobile Combustion – Construction Vehicles and Machinery (tCO2e/a)

4.1.6 Mobile Combustion – Plant Operation Vehicles

As above, mobile equipment that is owned, operated, or leased for the exclusive use on the company's site is considered under the category of Scope 1 emissions.

For the Base Case Scenario, it has been assumed that all the plant operation vehicles use diesel over Stage 1 of the operation years. Annual consumption of diesel has been calculated using Wood's database. It was assumed that a total of 50 light vehicles (a combination of light trucks, forklifts, cranes, lighting towers, etc.) and six 30-seater buses would be used. Annual consumption of diesel is either assumed values from the Wood's Database or has been collected from the vehicles' datasheet and specifications.

See [Appendix E](#page-122-0) for a discussion of the Greenhouse Gas Protocol Corporate Standard Selected Consolidation approach to mobile equipment.

Using the NGER factors for mobile combustion of diesel, the CO_{2e} for plant operations mobile combustion are summarised in [Table B1](#page-103-0).2 and [Table D1](#page-112-0).8 and [Table D1](#page-112-0).9 in [Appendix D](#page-106-0) and shown below in [Figure 4.7.](#page-48-0)

Figure 4.7: Annual CO2e Emissions from Mobile Combustion – Plant Operation Vehicles (tCO2e/a)

4.1.7 Product Transportation to the Port

The transportation of products (pellets and HBI) from the processing plant to the Lumsden Port and Utah Port is considered as a Scope 1 emission according to the EPA guidance. It is assumed that the products are transported to the port via triple road trains. In the Base Case scenario, diesel consumption by triple road trains contributes to Scope 1 emissions.

The average annual emissions from the transport of products from the processing plant to Lumdsen/Utah Port during the Stage 1 operating phase is approximately **1,886 tCO2e/a**. This is detailed in [Table D1](#page-114-0).10 i[n Appendix](#page-106-0) [D](#page-106-0) and shown below in [Figure 4.8.](#page-49-0)

The emissions reported for product transport in Q1-Q3 CY29 are attributed to pellet production. Additionally, during the ramp-up period, emissions arise from both full pellet production and the production of HBI.

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Figure 4.8: Annual CO2e Emissions from the Product Transport to the Port

4.1.8 Biogenic Impact

The Project is expected to include a wastewater treatment plant as part of the NPI. An assessment of the biogas emissions has been estimated from the chemical oxygen demand (COD) estimated to be released from wastewater treatment.

The amount of wastewater generated during construction years and an average year of operation has been estimated using the number of personnel on-site during operations specified in [Table D1](#page-115-0).11.

Using the global warming potential for biogenic methane from the Global Battery Passport [6], the CO_{2e} from wastewater treatment has been calculated and shown in [Table D1](#page-115-0).11 in [Appendix D.](#page-106-0)

The biogenic emissions will vary over the project life depending on the number of people on-site. During construction, emissions vary depending on the number of personnel on-site while during operation, emissions are expected to be stable at approximately 131.2 tCO_{2e}/a. This is shown below in [Figure 4.9.](#page-50-0)

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4.1.9 Summary of Scope 1 Emissions

[Table 4.2,](#page-50-1) [Figure 4.10,](#page-51-0) and [Figure 4.11](#page-52-0) below summarise the total Scope 1 emissions from the Stage 1 – POSCO PHGS Project.

Figure 4.10: Scope 1 Carbon Emissions Summary (tCO2e/a) – Construction and Ramp-up

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Figure 4.11: Scope 1 Carbon Emissions Summary (tCO2e/a) – Operations

4.2 Scope 2 Emissions

Scope 2 GHG emissions are defined as the emissions from the generation of purchased electricity that is consumed in a Company's owned or controlled equipment or operations. The Scope 2 emissions of the Project are summarised in this section.

4.2.1 Electrical Load

The overall electrical load for the pellet and HBI plant was provided by PHGS. The predicted operating load is current as of October 2023 and is subject to change as the PHGS progresses into the later stages of the Project.

Assumptions applied in this section are detailed in Section [3.6,](#page-26-0) with operating loads according to plant area shown in [Table 4.3.](#page-52-1) A constant emission factor has been assumed for the purchased power over Stage 1 of operation in the Base Case as confirmed by PHGS. This will exclude any opportunities the power suppliers take to reduce their emissions by introducing renewable energy into their grid.

4.2.2 Emission Factor for Western Australian Power

The Project will be connected to the Northwest Interconnected System (NWIS) electricity grid in WA, as shown in [Figure 4.12](#page-53-0) [7] below. The NWIS is currently supplied by non-renewable generation resources (open-circuit or combined-cycle gas-fired turbines).

According to the publicly available information from the power generators, the power supplier has an emissions factor of 0.52 tCO_{2e}/MWh as of 2022 [8].

Figure 4.12: Pilbara Network Facilities

In the Pilbara region, there are ongoing developments and plans for the construction of renewable energy sources, coupled with the expansion of a high-voltage distribution network. Several power providers are dedicated to executing additional renewable energy generation projects and have set ambitious targets to achieve net-zero greenhouse gas emissions by 2050. The emission reduction objectives declared by these power suppliers should be incorporated into the emission factors utilised for Scope 2 emissions once PHGS makes a final decision regarding their power procurement.

Assumptions for power supply emissions factors are described in Section [3.6.](#page-26-0)

4.2.3 Summary of Scope 2 Emissions

The emissions factor from Section [4.2.2](#page-53-1) was used in the calculation of Scope 2 emissions as shown in [Table 4.4](#page-54-0) below. The calculation has been summarised in [Table D1](#page-116-0).12 in [Appendix D.](#page-106-0)

4.3 Scope 3 Emissions

Scope 3 GHG emissions are the result of activities from assets not owned or controlled by the reporting company, but that the organisation indirectly affects in its value chain.

The calculation of PHGS' Scope 3 emissions outlined in the assumptions table in Section [3.6](#page-26-0) have been included in the scope of this assessment and summarised in this section.

4.3.1 Category 1 – Purchased Goods and Services

The Scope 3 emissions contribution for purchased goods and services has been estimated from the production of reagents used in the PHGS. Emission factors of the reagents were obtained from the suppliers where available or online sources.

Assumptions made regarding the emissions associated with the manufacturing of reagents can be found in Section [3.6.](#page-26-0) The emissions factors used are shown in [Appendix C.](#page-104-0)

[Table D1](#page-117-0).13 in [Appendix D](#page-106-0) summarises the Scope 3 emissions from the manufacturing of reagents used in the pellet and HBI plant. Annual emissions are shown below in [Figure 4.13.](#page-55-0)

Figure 4.13: Annual CO2e Emissions from Purchased Goods and Services (tCO2e/a)

4.3.2 Category 2 – Capital Goods

Indirect emissions from embodied carbon in capital goods purchased (including all vehicles, processing equipment and other infrastructure) have been included. This has been summarised i[n Table D1](#page-118-0).14 i[n Appendix](#page-106-0) [D.](#page-106-0)

Annual emissions are shown in [Figure 4.14](#page-56-0) below. Emissions from the capital goods are evaluated from the following sub-categories:

- Materials used for manufacturing vehicles and machinery utilised during construction and operation years
- Capital goods utilised in the construction phase, including concrete and steel
- Materials used for manufacturing mechanical equipment.

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[Decarbonisation Project](#page-0-5) [Emissions Assessment](#page-0-6)

4.3.3 Category 3 – Fuel and Energy

This category includes the emissions from the extraction, production, and transport of fuel burned by companies generating electricity and the emissions attributable to the electricity lost in delivery in the transmission and distribution network.

The Scope 3 emissions factor for the SWIS (0.04 tCO_{2e}/MWh) has been used as there is no reported factor for the NWIS.

Scope 3 – Fuel and energy emissions are shown in [Figure 4.15](#page-57-0) below and summarised in [Table D1](#page-118-1).15 in [Appendix D.](#page-106-0)

Figure 4.15: Annual CO2e Emissions from Scope 3 Fuel and Energy (tCO2e/a)

4.3.4 Category 4 – Upstream Transportation and Distribution

Assuming all reagents are traveling from various destinations that are not owned or operated by PHGS in WA, the emissions from this transportation, in addition to the transport of feedstock, will contribute to the Scope 3 emissions. This has been summarised in [Table D1](#page-119-0).16 in [Appendix D.](#page-106-0)

Scope 3 emissions from upstream transportation of reagents and feedstock are shown in [Figure 4.16](#page-58-0) below.

Figure 4.16: Annual CO2e Emissions from Upstream Transportation and Distribution (tCO2e/a)

4.3.5 Category 5 – Waste Generated in Operations

This category describes the emissions resulting from the treatment of solid waste generated by the camp accommodation. It has been assumed that there are between 132-1388 people on-site during construction and 350 people on-site during Stage 1 operating phase.

Emissions from waste during construction are approximately **6 216 tCO2e total**, **202 tCO2e total** during rampup, and during operations approximately **809 tCO2e/a** during Stage 1 (see [Table D1](#page-120-0).17 in [Appendix D\)](#page-106-0).

Figure 4.17: Annual CO2e Emissions from Waste Generated in Operations (tCO2e/a)

4.3.6 Category 7 – Employee Commuting

The employee commuting to and from Perth to the Project will be done from the Perth Airport and PHGS' airstrip, which is located within close proximity to the village.

Based on the proposed personnel numbers, roster patterns, and assumptions for visitors, it is assumed that a total of 6370 flights per annum, will be required over the operational phase of the LOA. This is assuming that 90% of occupants will be FIFO on a 8/6 roster.

During the construction phase, it is assumed that there will be approximately between 132-1388 people onsite, resulting in an estimated total of 88 293 flights total over the construction years between 2026 and 2029. It is assuming that all construction personnel will be on 2x1 rosters with 1005 FIFO arrangement.

Employee commuting to and from the mine site and the airport has been assessed based on the proposed site location.

Total emissions for employee commuting during construction are approximately **8 642 tCO2e**, and during operations approximately **635 tCO2e/a,** as shown below in [Figure 4.18](#page-60-0) (see [Table D1](#page-120-1).19 in [Appendix D\)](#page-106-0).

Figure 4.18: Annual CO2e Emissions from Employee Commute (tCO2e/a)

4.3.7 Category 9 – Downstream Transportation and Distribution

The transport of pellets and HBI will be done by shipping. It has been assumed that the product will be shipped to Steel Producers in Japan, South korea and Taiwan via Utah Port and Lumsden Port in a panamax shipping bulk vessel. It should be noted that the transportation of the product from the Project site to the Utah and Lumsden port via road transportation has been considered as part of Scope 1 as per the EPA guidance and the balance of product travel has been calculated as a Scope 3 emission.

The average annual emissions from downstream transportation during the Stage 1 operating phase is approximately 41 022 tCO_{2e}/a. This is detailed in [Table D1](#page-120-2).20 in [Appendix D](#page-106-0) and shown in [Figure 4.19.](#page-61-0)

Figure 4.19: Annual CO2e Emissions from Downstream Transportation and Distribution (tCO2e/a)

4.3.8 Category 10 – Processing of Sold Products

The processing of HBI product and a fraction of iron pellets that is sold (in the form of pellet) to steel producing companies contributes to PHGS' Scope 3 emissions. The emissions have been calculated based on the GHG emitted to convert HBI or pellets to the final steel product, using an indicative emission factor of 0.72 tCO_{2e}/t HBI and 1.19 tCO_{2e}/tPellet [9]. This has been summarised in [Table D1](#page-121-0).21 in [Appendix D](#page-106-0) and shown below in [Figure 4.20.](#page-62-0)

The relatively high amount of emissions in Q1-Q3 CY29, is due to the high export rate of pellet product prior to the start up of the HBI plant in CY30. Once the HBI plant is fully operational, the export of surplus pellets, those not used as feed in the HBI plant, will decrease and hence there is a significant reduction in emissions arising from the processing of pellets.

4.3.9 Summary of Scope 3 Emissions

[Figure 4.21,](#page-62-1) [Figure 4.22,](#page-63-0) and [Table 4.5](#page-63-1) below summarises the Scope 3 emissions from the Project.

Figure 4.21: Scope 3 Emissions Summary (tCO2e/a) – Construction and Ramp-up

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5 Emissions Abatement Opportunities

Decarbonisation of the Project requires addressing emissions from multiple sources. This section summarises the areas and opportunities planned by PHGS or assessed by Wood for Scope 1 emissions reduction in the Low-carbon Case.

5.1 Hydrogen Injection to Replace NG

PHGS have taken a strategic approach that involves gradual integration of hydrogen throughout the Project's lifecycle, aimed at significantly mitigating $CO₂$ footprint associated with HBI production. The proposed schedule for substituting natural gas with hydrogen is outlined in [Appendix F.](#page-124-0)

The integration of hydrogen into the HBI production process results in a significant reduction in HBI plant's CO² emissions. According to projections illustrated for Stage 1 Scope 1 emissions in [Figure 5.1,](#page-65-0) the implementation of hydrogen is expected to lead to a clear decrease in carbon emissions over time as opposed to PHGS continuing their production using 100% Natural Gas. The results are summarised in [Table F1](#page-125-0).1 and [Table F1](#page-127-0).2 in [Appendix F.](#page-124-0)

5.2 Carbon Capture Storage

Carbon Capture Storage (CCS) are processes that are able to capture $CO₂$ emissions and prevent them from being released into the atmosphere. This becomes particularly important for emissions that are difficult to avoid, such as capturing CO₂ released from Midrex process during HBI production.

According the information provided by PHGS and the process licensor, there are two possible points for precombustion and post-combustion capture of $CO₂$ [\(Figure 5.2\)](#page-66-0).

According to PHGS and the process licensor, top gas fuel separated from the gas can capture up to 44% of the $CO₂$ before combustion, and post-reformer flue gas can capture up to 84% of the $CO₂$ before leaving the flue gas stack. In this study, it was assumed that $CO₂$ is captured after reformer before leaving the flue gas stack.

The reformer flue gas contains approximately 0.92 Mt CO₂ at a concentration of 15%, based on a flow rate of 400 000 Nm³ /hr.

Figure 5.2: Potential CO² Capture Points from Modrex Process (HBI Plant)

PHGS have provided the CCS rates as tabulated i[n Table 5.2](#page-66-1) below. The application of CCS technology to further reduce emissions, complementing the already abated levels through H₂ substitution, is illustrated in [Figure 5.3.](#page-67-0) The assessment is also provided in [Table F1](#page-125-0).1 and [Table F1](#page-127-0).2 in [Appendix F.](#page-124-0)

5.3 Electrification of Fleet

5.3.1 Electrification of Operation Vehicles

Wood have assessed the opportunity to electrify the operating vehicles assuming the following schedule:

- Construction vehicles remain as diesel vehicles throughout construction years
- Operation Vehicles are electrified according to the following schedule:
	- Electric buses from the start of the operation \sim
	- 25% of all vehicles are transitioned to electric vehicles by 2031
	- 100% of all vehicles are transitioned to electric vehicles by 2034. \equiv

[Figure 5.4](#page-68-0) compares CO_{2e} emissions from mobile combustion for the Base Case and Low-carbon Case. No carbon is expected to be emitted from operation vehicles in the Low-carbon Case after CY34 as vehicles will be electrified.

Electrifying vehicles results in a higher operating load (i.e. higher electricity power consumption). This has been taken into account in the Scope 2 emissions calculations for the Low-carbon Case.

5.3.2 Electrification of Product Transport Fleet

The products (iron pellets and HBI) are transported via triple road trains to Utah Port and Lumsden Port from the processing plant. Wood have assessed the opportunity where road trains are electrified over the time to decarbonise the product transportation. The product will be shipped via Panamax vessels from Lumsden Port to Asian steel producers.

The vehicle electrification is scheduled as per the following assumptions:

- 25% of all vehicles are transitioned to electric vehicles by 2031
- 100% of all vehicles are transitioned to electric vehicles by 2034.

[Figure 5.5](#page-69-0) provides a comparison for the Scope 1 production transportation for the Base Case and Low-carbon Case.

 \widehat{d}

2026 (Q2-

2029 (Q1-Q3)

5.4 Using Less Emission Intensive Electricity

Base base Case

2034
2037

Renewable energy sources are being constructed or planned in the Pilbara along with an expanded highvoltage distribution network. Power suppliers have commitments/agreements in place to implement more renewable energy generation projects and aim for net zero GHG emissions by 2050 [10].

Low-carbon Case

The emissions factors used to calculate the Scope 2 emissions over the LOA are depicted in [Figure 5.6](#page-70-0) for the Base Case and Low-carbon Case.

[Figure 5.7](#page-70-1) depicts the Scope 2 emissions for the Base Case (where the EF remains constant throughout the LOA) and Low-carbon Case (where the EF reduces over the year as per the power supplier's commitment).

Figure 5.7: Scope 2 Emissions tCO2e/a – Base Case and Low-carbon Case

5.5 Product Emissione Intensity of Low-carbon Case

Integration of emissions abatement opportunities results in lower emission intensive products as shown in [Figure 5.8.](#page-71-0)

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Figure 5.8: Average Annual Carbon Intensity (tCO2e/tHBI) (Scope 1, 2, and 3) for Low-carbon Case

5.6 Other Abatement Opportunities

In addition to the decarbonisation strategies evaluated in the previous sections, there are other opportunities that can be assessed in the future, especially for abating Scope 3 emissions. At a very high-level, some of these opportunities are listed below:

- Waste heat recovery
- Optimising equipment choice, redundancy and sizing
- Sustainable buildings
- Using less emission intensive reagents
- Using green ammonia or biofules for bulk transport via shipping
- Using sustainable aviation fuel.

6 Emissions Summary

The total Scope 1, Scope 2, and Scope 3 emissions during construction years and Stage 1 – operation years from the Project Base Case have been summarised below in [Table 6.1,](#page-72-0) [Figure 6.1](#page-73-0) and [Figure 6.2.](#page-74-0)

The carbon intensity from each category is shown for an average operation year in [Table 6.2](#page-74-1) and [Figure 6.3](#page-76-0) for HBI and in [Figure 6.4](#page-76-1) for pellets.

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Figure 6.1: Carbon Emissions: Scope 1, 2, and 3 (tCO2e/a) – Construction and Ramp-up

Note that there are no Scope 2 emissions during the construction phase as it is assumed that there will be no connection to the grid and everything will be connected to a diesel generator.

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Figure 6.3: Carbon Intensity: Scope 1, 2, and 3 (tCO2e/tHBI)

Figure 6.4: Carbon Intensity: Scope 1, 2, and 3 (tCO2e/tPellet)

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7 Uncertainty

The GHG Corporate Protocol principle of accuracy states "Data should be sufficiently precise to enable intended users to make decisions with reasonable assurance that the reported information is credible. GHG measurements, estimates, or calculations should be systemically neither over nor under the actual emissions value, as far as can be judged, and that uncertainties are reduced as far as practicable. The quantification process should be conducted in a manner that minimises uncertainty. Reporting on measures taken to ensure accuracy in the accounting of emissions can help promote credibility while enhancing transparency."

While every attempt has been made to ensure accuracy in calculations performed in this report, the following sources of uncertainty have been identified.

7.1 Activity Data

- Wood cannot endorse the accuracy of mass balance of the HBI plant, as the information provided by the third party (Primetals) and only restricted to the emission points. No mass balance data on the gaseous emission is provided for the pellet plant. Reagents and other consumables usage have been taken from FS Report.
- The electrical power demand has been calculated using data provided by PHGS outlining the overall consumption rate for HBI and pellet plants.
- Testing and operation protocols for firewater diesel pump and standby generators during Stage 1 operating phase of the Project is based on 1% availability. This can be seen as a conservative assumption and might need to be updated in later stages.
- Reagent suppliers are yet to be confirmed, any changes may affect the transportation distance and emissions.

7.2 Physical Properties and Conversion Factors

• Physical properties used in the report, such as gas calorific values and diesel density are only specific to Australia where available.

7.3 Emissions Factors

• The Emission Factors for some reagents are not well-publicised and few references were found. Assumptions were made where required. All emissions factors used in this report are shown in [Appendix](#page-104-0) [C.](#page-104-0)

8 Benchmarking

This section will cover a benchmarking assessment on iron pellets, HBI, and steel in accordance with the Safeguard Mechanism as outlined in [Appendix G.](#page-130-0)

8.1 Methodology

To ensure the accuracy and reliability of comparison, this benchmarking section relies on publicly available data from diverse sources, such as annual reports, sustainability disclosures, and industrial/academic publications.

The analysis focuses primarily on steel production either using blast furnace-basic oxygen furnace (BF-BOF) route or secondary production from EAF. The emission intensity of interim products such as HBI and direct reduced iron (DRI) were investigated and included in the report where data was available from the producers. Direct GHG emissions stem from steel production, processes, mining, extraction, smelting, and refining. Indirect emissions that arise from energy generation, upstream and downstream transportation, reagent production, etc. may also be taken into consideration where reported by the steel production companies.

The emission intensity metrics employed in this report will be expressed as GHG emissions per unit of product produced, typically measured in metric tonnes of CO₂ equivalent (CO_{2e}) per metric tonne of crude/liquid steel (tCO2e/t Steel). Emission intensity of interim products (resulting from the reduction of oxide iron) was reported as metric tonnes CO_{2e} per metric tonne of DRI or iron pellet. Normalising emissions to steel output allows for meaningful comparison between suppliers of varying scales and production volumes.

8.2 Limitations

It is crucial to acknowledge the inherent limitations of this benchmarking section. The accuracy and reliability of the data hinge upon the transparency and consistency of reporting among the suppliers included in the analysis. Discrepancies in methodologies, data availability, and reporting practices may impact the comparability of emission intensity metrics. Furthermore, this benchmarking analysis may not encompass the entirety of the environmental impacts linked to steel production, such as water consumption, land use, and waste management.

Notwithstanding these limitations, this benchmarking report endeavours to provide a comprehensive overview of emission intensity performance across different steel (or intermediate product) suppliers. By identifying sustainability leaders and pinpointing areas for improvement, it aims to facilitate informed decision-making, foster transparency, and encourage the adoption of environmentally friendly practices within the steel industry.

8.3 Benchmarking of Downstream Steel Plants

Steel production is a significant contributor to total global $CO₂$ emissions. It is estimated that steel products are responsible for 11% of all CO₂ emissions according to Carbon Brief [11]. Other sources like Our World in Data estimate that the emissions contribution is closer to 7.2% [12]. A remarkable fact in these statistics is that more than half of all steel and thus emissions are produced in China. In 2019, 1875 Mt of steel were produced, equating to 3375 Mt of $CO₂$ emitted [13].

The majority of today's CO₂ emissions is the result of BF-BOF steel production, which mainly uses coking coal in the BF to turn iron oxide into iron which is then cast into steel. BF-BOF steelmaking currently accounts for

1.4 billion tonnes of the 1.9 Billion tonnes in annual steel production and has an emissions intensity of an average of 2.2 tonnes of CO_{2e} per tonne of steel [14].

The use of scrap in steelmaking is predicted to increase over the coming decades, meaning that achieving a zero-carbon emissions steel industry by 2050 is predominantly reliant on making net zero primary steel [14].

The amount of CO_{2e} produced per tonne of steel is generally higher in China, with the emission intensity reaching as high as 3 tCO_{2e},t steel. This is because most of China's steel is produced in BF ovens which is the most carbon-intensive process. These ovens mainly produce steel from iron ore which is heated to 1500°C. Oxygen is blasted on the liquid iron to remove unwanted elements [13].

Steel production in Europe is less carbon-intensive. The reason is attributed to the fact that 40% of Europe's steel is produced in a 'cleaner' method which incorporates the EAF route. The heat required to melt the metal comes from an electric arc that arises when the electrodes contact the metal. Temperatures can go up to 3500°C, while the temperature of the steel is around 1800°C [13].

8.3.1 Emission Intensity of Downstream Steel Production

The primary route is what is used most across the world, which is why the average amount of $CO₂$ emitted per metric tonne of steel produced is 1.85 according to the World Steel Association [15].

8.3.1.1 Emission Intensity Based on the Production Route

The BF-BOF route, the traditional method, involves the extraction of iron from iron ore in a blast furnace and subsequent conversion into steel through the basic oxygen process. This route typically results in higher emission intensity due to the reliance on coke and coal in the BF, leading to significant CO₂ emissions. On the other hand, the EAF route utilises scrap steel as the primary raw material, which is melted using electricity in an EAF. The EAF route generally exhibits lower emission intensity compared to BF-BOF, as it relies on electricity rather than coal-based energy sources [\(Figure 8.1\)](#page-80-0). Moreover, the EAF route offers the advantage of producing steel with a lower overall carbon footprint when using recycled steel scrap, reducing the demand for virgin iron ore extraction. As sustainability and environmental concerns continue to drive innovation in the steel industry, the adoption of the EAF route and the promotion of scrap recycling contribute significantly to reducing the emission intensity of steel production.

8.3.1.2 Emission Intensity Based on the Product Type

The emission intensity of various steel products can vary significantly based on their production processes and characteristics. Product types such as plates, sections, tubes, hot-dip galvanised (HDG) steel, and others differ in their manufacturing methods and energy requirements, which ultimately affect their carbon emissions. For example, HDG, commonly used for corrosion protection, involves a coating process that requires additional energy and can influence the emission intensity of the final product. [Table 8.1](#page-80-1) shows the carbon intensity of various steel products and has been derived from Worldsteel database [16].

8.3.1.3 Emission Intensity Based on the Region

Operating steel plants in China account for more than half the global total, followed by Japan and India [11]. More than 60% of installed steelmaking capacity uses the high-carbon BF-BOF method, in which iron ore is smelted with heat from burning coal, which also acts as the "reducing" agent needed to turn the ore into metal. China's steel fleet is particularly reliant on this method, and it notably accounts for 62% of global BF-BOF capacity [11].

Carbon Brief reports that at least 65% of the current global capacity uses the BF-BOF method (orange bars), of which 88% (44 Mt/a) is in China. (The figure for India is likely to be higher than shown given that the method for its remaining 26 Mt/a of proposed capacity has not been disclosed.)

wood

In terms of plants under development using the EAF method (light blue bars above), China and Iran each plan to develop 7.2 M/ta of capacity, together accounting for 53% of the EAF total.

Roughly every 25 years after commissioning a BF in a near-continuous operation mode, it will need to have its internal refractory lining replaced. During operation, this lining is subjected to temperatures in excess of 1400-1500°C and corrosive compounds present in the slag and molten iron, which eventually cause it to degrade. The initial installation cost of a blast furnace is around US\$200-300 M per Mt of capacity, and the relining cost (happening approximately every 25 years) is typically around half of this figure. This significant level of additional investment to renew the life of the furnace must be considered in the context of several competing outlets for capital expenditure, including greenfield investments in a new location [17].

Assuming a typical lifetime of 40 years, alongside an interim investment cycle of 25 years, it is possible to assemble the regional average age profile of the existing fleet of blast furnaces and DRI furnaces [\(Figure 8.3\)](#page-82-0). The weighted global average age of these regional figures is approximately 13 years for blast furnaces and 14 years for DRI furnaces. Coal injection blast furnaces tend to be a little younger at 13 years, whereas gas injection installations stand at around 16 years. For coal- and gas-based DRI furnaces, the figures are 13 years and 14 years respectively. Underlying these global figures is considerable regional differentiation [17].

As mentioned before, China accounts for over 50% of all ironmaking capacity (both DRI and BF). Its relatively young blast furnace fleet (around 12 years on average) is the main factor explaining the youth of the global fleet overall. Its coal-based DRI furnaces are younger still, at just 8 years on average. The range of ages of individual plants within the country will vary considerably, but China's growth in steel output over the past 20 years (more than eightfold) shows the relatively short timeframe over which most of these installations have been added [17].

On either side of the giant share of Chinese capacity in the middle of the age profile curve is a significant variation in average age across the other regions. At either extreme are some of the recently refurbished European BFs (less than 10 years) and coal-based DRI furnaces in South Africa (around 35 years). The other major producing regions at the younger end of the spectrum are the United States (gas injection BFs around 12 years) and the Middle East (gas-based DRI furnaces around 10 years). At the older end are Russian gas injection blast furnaces (around 20 years) and Mexico's gas-based DRI fleet (around 25 years). India and Japan's coal blast furnaces are similar in average age to China's at 15 years and 14 years respectively [17].

The age profiles and typical lifetimes of these larger assets are a good guide to the rate at which the existing stock of equipment in the iron and steel sector will be decommissioned. Without any further investment in new capacity, emissions from the steel industry would decline, but not as fast as one might think. If operated under the conditions typically observed in recent years, existing steel industry infrastructure could lead to roughly 65 Gt CO² of cumulative emissions between now and 2060 [\(Figure 8.4\)](#page-83-0) [18].

Figure 8.4: Projected Emissions from the Existing Equipment in the Steel Industry

8.3.2 Major Steelmaking Companies

8.3.2.1 ArcelorMittal

ArcelorMittal is one of the largest steel producers in the world and has been actively addressing the issue of carbon emissions in its operations. Arceromittal reported 160.3 MtCO_{2e}/a as their absolute CO_{2e} emissions in 2020 for their steel and mining operations. This corresponds to an emission intensity of 2.08 tCO_{2e}/t steel. By comparison, the global average figure provided by the World Steel Association is 1.83 tCO_{2e}/t steel [15]. ArcelorMittal pointed out that the key reason for their higher carbon intensity was that the share of ArcelorMittal production from the more carbon-intensive primary steelmaking route stood at 81% – compared with 72% in the global steel market as a whole [14].

8.3.2.2 Tata Steel UK

Tata Steel UK, a subsidiary of Tata Steel, operates steel production facilities primarily in the United Kingdom (UK). The company has been committed to reducing its carbon footprint and has set ambitious targets to achieve significant emissions reductions.

One notable initiative by Tata Steel UK is its involvement in carbon capture and utilisation (CCU) projects. The company has been exploring and investing in innovative technologies that capture and utilise $CO₂$ emissions from steelmaking processes. By capturing and repurposing CO₂, Tata Steel UK aims to minimise its emissions

and contribute to the development of a more sustainable steel industry. The details about Tata Steel $CO₂$ emissions are provided in [Table 8.2](#page-86-0) [19].

8.3.2.3 POSCO

POSCO, a leading steel producer based in South Korea, has been actively addressing carbon emissions and working towards reducing its environmental impact. The company has been investing in research and development to develop and adopt innovative technologies that improve energy efficiency and reduce CO₂ emissions throughout the steelmaking process. The company has been actively exploring and implementing new methods for eco-friendly steel production, such as hydrogen-based processes, to reduce carbon emissions during steel production. The details on the current $CO₂$ emission from POSCO steelmaking facilities are provided in [Table 8.2](#page-86-0) [20].

8.3.2.4 Nippon Steel

Nippon Steel is a key player in the global steel market. Nippon Steel operates a wide range of steel production facilities, both in Japan and around the world, catering to diverse industries such as automotive, construction, energy, and infrastructure.

Nippon Steel has been committed to implementing measures that mitigate greenhouse gas emissions throughout its operations. The company understands the significance of sustainability and has set ambitious targets to decrease its carbon footprint. Nippon Steel has been investing in research and development to adopt innovative technologies and processes that enhance energy efficiency and reduce $CO₂$ emissions in steel production. They aim to optimise their manufacturing processes, employ cleaner energy sources, and develop low-carbon production methods [21].

8.3.2.5 ThyssenKrupp Steel

Thyssenkrupp, a renowned multinational conglomerate with operations in various industries, including steel production, is actively addressing carbon emissions, and working towards reducing its environmental impact. They have reported emitting 20 MtCO_{2e}/a in their steel production location in Europe. Since 2021, ThyssenKrupp started producing CO2-reduced bluemint® which is greener steel. Thyssenkrupp has announced up to 70% reduction in $CO₂$ emissions with no quality difference from the existing grades [22], [23].

8.3.2.6 Cleveland-Cliffs

Cleveland-Cliffs Inc. is a US-based company and prominent company in the steel mining industry. Cleveland-Cliffs has taken significant strides to address its carbon emissions and reduce its overall environmental impact. By focusing on energy efficiency, adopting cleaner technologies, and investing in renewable energy sources, Cleveland-Cliffs aims to mitigate its greenhouse gas emissions and contribute to a more sustainable future for the industry. Cleveland-Cliffs reported their crude steel emission intensity of 1.97 tCO_{2e}/t steel in 2022 [24]. More details can be found in [Table 8.2.](#page-86-0)

8.3.2.7 Hyundai Steel

Hyundai Steel is a member of Hyundai Motor Group and is headquartered in South Korea. According to the Sustainability Report issued in 2022, the emission intensity of Hyundai's crude steel is 1.14 tCO_{2e}/t steel, including Scope 1 and Scope 2 emissions. Hyundai Steel is planning to implement a carbon-neutral manufacturing system called 'Hy-Cube and introduce a 'hydrogen-based steel manufacturing system' in line

with the 2050 carbon neutrality scenario and the 2030 NDC (Nationally Determined Contribution) [25]. More details can be found in [Table 8.2.](#page-86-0)

8.3.2.8 Metalloinvest, OEMK Enterprise

Metalloinvest is based in Russia and holds the world's largest proven reserves of iron [26]. OEMK is a major enterprise and a part of the Metalloinvest group, one of the leading global producers and suppliers of iron ore and steel products. It is an integrated steel plant that specialises in the production of long products, such as rails, wire rods, and rebar, which are used in various industries, including construction, infrastructure, and transportation. Metalloinvest group has reported an emission intensity of 2.09 tCO_{2e}/t steel for their OEMK enterprise in 2022. More details can be found in [Table 8.2.](#page-86-0)

8.3.2.9 Qatar Steel Company

Qatar Steel Company (QSC) has two MIDREX-based Direct Reduction Plants, three electric arc furnaces, two rolling mills, and two lime calcination plants. The plants are run on electric power supplied by the local electricity distributing entity, KAHRAMAA, and natural gas supplied by Qatar Energy. The use of cleaner energy sources reduces the pollutants emissions substantially. QSCs reported emission intensity of 0.985 tCO_{2e}/t steel in 2021 is well below the industry standard [27]. However, it is worth noting that the reported carbon intensity does not include Scope 3 emissions. Emissions from QSC's steelmaking facilities are provided in [Table 8.2.](#page-86-0)

8.3.2.10 Jindal Shaded Iron and Steel

Jindal Shadeed Iron & Steel (JSIS) is a large privately-owned integrated steel producer in Oman. Approximately 71% of global steel production emits an average of 2.32 tCO_{2e} for every tonne of steel produced through the BF-BOF route. JSIS belongs to the 7% of primary steel producers worldwide (excluding scrap and EAF users) employing the DRI-EAF route with non-scrap based steel production, which results in 30% lower CO₂ emissions compared to the BF-BOF route. By adopting this steel-making process, JSIS achieves emissions of 1.57 tCO_{2e}/t steel, leading to an annual saving of 1.68 million tCO_{2e} compared to the BF-BOF route [28].

8.3.2.11 Nucor Corporation

Nucor is a US-based company that produces sheet steel, plate steel, structural steel, and bar steel in its steel mills facilities. Nucor manufactures steel principally from scrap steel and scrap steel substitutes using EAFs, paired with continuous casting and automated rolling mills. Nucor is committed to an additional 35% combined reduction in the Scope 1 and Scope 2 GHG emissions intensity of its steel mills by 2030. At present, Nucor's GHG emissions are just 0.47 tCO_{2e}/t steel. However, it is worth noting that Nucor's steel carbon intensity does not include Scope 3 emissions [29]. Emissions from Nucor's steelmaking facilities are provided in [Table](#page-86-0) [8.2.](#page-86-0)

8.3.3 Summary of Steel Emission Intensity Reported by Major Steel Producers

A high-level summary of the information available from the literature study can be found in [Table 8.2.](#page-86-0)

posco

 1 POSCO reported 1.84 tCO_{2e}/krw billion

² The reported emissions are for a greener steel product called "bluemint®"

³ Cleveland-Cliffs reported an energy intensity of 25 GJ/t crude steel

⁴ NS: Not Specified

8.4 Benchmarking for DRI/HBI plants

There is currently limited emission intensity information available for intermediate iron products such as HBI and iron ore pellets. Sections [8.4](#page-87-0) and [8.5](#page-88-0) summarises all the information that could be found for HBI, DRI, and pellet plants.

8.4.1 Major HBI/DRI Producer Companies

8.4.1.1 Metalloinvest

The core business of the companies integrated into Metalloinvest Group is the production and sales of metallised products (HBI and DRI), iron ore products (concentrate, iron ore, and metallised pellets), as well as high-quality long products, including SBQ (special bar quality). According to the company structure, LGOK and MGOK are the operational assets for the production and sale of iron ore products, whereas OEMK is the enterprise for the production and sale of steel products. [Table 8.3](#page-87-1) summarises the Scope 1-3 emissions from the Metalloinvest enterprises that produce HBI and DRI, which are used as the feed to the steel plant [26].

8.4.2 Summary of Reported DRI/HBI Emission Intensity

A high-level summary of the information available from the literature study can be found in [Table 8.4.](#page-87-2)

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8.5 Benchmarking of Pellet Plants

Current iron and steelmaking technologies rely on being fed with iron ore feedstock above a characteristic size (diameter). Lump hematite is an ore of sufficient quality and mined rock diameter that can be directly fed to further processing stages. All other ore must first be agglomerated before it can be used.

This process can be decarbonised through the process of pelletisation which uses a hydrogen indium furnace to help form the pellets. Green pellets are a potential next step in the value chain beyond the supply of green hematite ore or magnetite concentrate.

Pelletisation involves heating and binding fine iron ore into larger-sized material. Pellets can be made from extremely finely ground product, and so is a suitable technology to pelletise both magnetite concentrates and processed haematite fines [36].

8.5.1 Major Iron Pellet Producers

8.5.1.1 LKAB

LKAB is a Swedish mining company that mines ores at Kiruna and at Malmberget in northern Sweden. The iron ore is processed into pellets and sinter fines and the product is sold throughout much of the world, with the principal markets being European steel mills, as well as North Africa, the Middle East, and Southeast Asia [37]. LKAB has reported an 84% reduction per tonne of pellet product from 1960 [38]. Based on a note from LKAB project manager, heating in the pelletising plants is the major source of carbon dioxide emissions in the process. LKAB is planning to move towards carbon-free products by step-wise substituting hydrogen [39]. According to the LKAB environmental roadmap, their product will be carbon-free by 2045. $CO₂$ emissions from LKAB facilities are provided in [Table 8.5.](#page-90-0)

8.5.1.2 Vale

Vale has announced the production of green briquette as an alternative to pellets. This can reduce $CO₂$ emissions of steel-making companies by up to 10%. The green briquette is part of Vale's strategy to reduce by 15% Scope 3 emissions, related to its value chain, by 2035. Long-term estimates are that the company will have the capacity to produce more than 50 Mt of green briquette per year resulting in a potential reduction in emissions of 6 MtCO_{2e}/year through the use of this technology [40].

8.5.1.3 Samarco

Samarco is a company based in Brazil that produces iron ore pellets through its operating units in Minas Gerais and Espírito Santo states. In 2022, Samarco produced over 9.2 Mt of iron ore pellets and fines. Samarco have reported Scope 1, Scope 2, and Scope 3 emissions in accordance to the Brazillian GHG Protocol Program and are actively working on studies to reduce climate risks and develop a decarbonisation plan for their operations [41].

8.5.1.4 U.S. Steel

U.S. Steel is a global steel producer that combines integrated BF, BOF and mini mill steel process technologies to produce steel. U.S. Steel is working to develop lower GHG emission steels with all the performance characteristics of existing steel grades and are transparent in reporting their emissions from all their operations including the mini mill and pelletising plant in their sustainability report [42].

8.5.2 Summary of Reported Iron Pellet Emissions Intensity

Minerals Research Institute of Western Australia (MRIWA, 2023) has reported that the use of green pellets in steelmaking would reduce the steel emissions intensity by 0.12 tCO₂/t steel [36]. According to guidelines for national emission inventories (IPCC, 2019), pellet production has an EF of 0.19 tCO2/tPellet (chosen as the maximum reported value and only exclusive to CO_2 emissions (not including CH₄ and N₂O emissions) [35] [43]. [Table 8.5](#page-90-0) provides a summary of reported iron pellets emissions intensity.

¹ Scope 1 emissions only

² Scope 1 and Scope 2 emissions

8.5.3 Safeguard Mechanism Benchmarking

According to the Safeguard Mechanism Document, HBI falls under the Primary Iron production variable which has a best practice benchmark emission intensity of 1.77 tCO_{2e}/unit, where the unit is tonnes of metallic iron products [44].

Based on Wood's assessment, PHGS emission intensity for HBI is expected to be 0.55 tCO_{2e}/ t HBI (Scope 1 emissions only), which is lower than the Safeguard mechanism best practice benchmark of the Primary Iron production variable. With the inclusion of abatement measures (CCS and replacing natural gas with H₂), this emission intensity is expected to decline over time, as depicted in [Figure 8.5.](#page-91-0)

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[Port Hedland Green Steel Project](#page-0-0) [Decarbonisation Project](#page-0-1) [Emissions Assessment](#page-0-2)

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Appendix A The Wood Decarbonisation Process

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A1 The Wood Decarbonisation Process

Responsible and future-looking companies are aligning themselves with the global standards and best-practice of clean energy supply chains. Investors, banks, shareholders, stakeholders and customers are beginning to prefer those companies who are Environmental, Social, and Governance-compliant (ESG), whose processes and products have low-carbon intensity and who have a decarbonisation roadmap.

Minimising the greenhouse gas emissions from the supply, processing and distribution chain is most effectively done in the earlier stages of project development – in the study phase – by applying decarbonisation targets to the design and undertaking a process of assessment, analysis, and optimisation.

Wood applies a methodology for greenhouse gas emission assessment and decarbonisation strategy development. The process is illustrated in [Figure A1.1](#page-96-0) below and includes the preparation of an emissions assessment, minimisation of the carbon intensity of the design, cost estimation, financial analysis, risk assessment and development of decarbonisation strategy.

Figure A1.1: Wood Decarbonisation Process

Wood can prepare a Decarbonisation Strategy report summarising recommended options for decarbonisation of the plant design and can provide details of technological and financial implications for the Project. This will be an input into the plant design and environmental applications for regulatory approvals.

The following is included in the complete Wood Decarbonisation Strategy process:

A1.1 Base Case and Low-carbon Case Emissions Assessment

The **Base Case and Low-carbon Case Emissions Assessment** of the design (with comparison and reference to the Client's emission reduction targets where applicable) including Scope 1, 2 and, as far as possible, Scope 3 emissions.

A1.2 Decarbonisation Opportunities

Recommendations for feasible decarbonisation opportunities via **Elimination, Substitution and Reduction** (and **Capture** and **Offset** where applicable) that can be applied to the design. Where possible and in collaboration with the Client, these adjustments can be made during the design process to optimise the final DFS engineering deliverables.

A1.3 Marginal Cost of Abatement Curves

Costing and Economic Analysis of the decarbonisation opportunities over the short, medium, and long term, include forecast availability of future technologies and commodities, policies and market impacts (development of Marginal Abatement Cost curves).

A1.4 Risk Assessment

- **Risk and Opportunity Register** with likelihoods, consequences, and prioritisation
- Risk **elimination and mitigation** identification
- **Residual Risk Ranking.**

A1.5 Decarbonisation Strategy

Development of a **Decarbonisation Strategy** which is the strategy for:

- An optimised design that balances cost and benefit, including low-carbon choices for, e.g.:
	- \sim Product
	- Process \equiv \equiv
	- **Site** \sim
	- Schedule
	- Procurement strategy.
- Future Actions (e.g. risk mitigation, negotiation of supply and offtake agreements, technology investigation and investment, long-lead equipment procurement)
- Project Capital and Operating Budget for decarbonisation investment for the short, medium and long term for input into the business capital planning cycle.

[Port Hedland Green Steel Project](#page-0-0) [Decarbonisation Project](#page-0-1) [Emissions Assessment](#page-0-2)

Appendix B Assessment Methodology

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wood.

B1 Assessment Methodology

This report has been prepared in compliance with the Greenhouse Gas Protocol and the Intergovernmental Panel on Climate Change (IPCC) guidelines. The assessment includes Scope 1, 2, and 3 emissions, as described below.

B1.1 The Greenhouse Gas Protocol

The GHG Protocol Corporate Accounting and Reporting Standard (GHG Protocol Corporate Standard), was first published in September 2001 and is now adopted and acceptance globally by businesses, non-governmental organisations (NGOs), and governments as the guidance standard for greenhouse gas accounting and reporting [1].

Businesses benefit from using a common standard for GHG inventory, it improves the consistency, transparency, and understandability of reported information, making it easier to track and compare progress over time.

The latest version of GHG Protocol Corporate Standard (3.51) published in 2015 provides requirements and guidance for companies and other organisations, such as NGOs, government agencies, and universities, that are preparing a corporate-level GHG emissions inventory. It has been used as the basis for this assessment as this assessment assumes the Port Hedland Green Steel Project is built and operating as designed, in which case this is the standard that would be applicable for calculating and reporting the GHG emissions.

Greenhouse gas emissions are classified as Scope 1, 2, and 3. See below for an overview of the classification.

B1.2 Scope 1 Emissions

The GHG Protocol Corporate Standard defines Scope 1 GHG emissions as the emissions from sources a company owns or controls. They are generally direct GHG emissions and are principally the result of the following types of activities undertaken by the company:

- **Stationary Combustion –** On-site generation of electricity, heat, or steam. These emissions result from combustion of fuels in stationary sources, e.g. boilers, furnaces, turbines
- **Physical or Chemical Processing –** Most of these emissions result from manufacture or processing of chemicals and materials, e.g. cement, aluminium, adipic acid, ammonia manufacture, and waste processing
- **Mobile Combustion –** Transportation of materials, products, waste, and employees. These emissions result from the combustion of fuels in company owned/controlled mobile combustion sources (e.g. trucks, trains, ships, airplanes, buses, and cars)
- **Fugitive Emissions –** These emissions result from intentional or unintentional releases, e.g. equipment leaks from joints, seals, packing, and gaskets; methane emissions from coal mines and venting; HFC emissions during the use of refrigeration and air conditioning equipment; and methane leakages from gas transport.

B1.3 Scope 2 Emissions

The GHG Protocol Corporate Standard defines Scope 2 GHG emissions as the emissions from the generation of purchased electricity that is consumed in its owned or controlled equipment or operations. Scope 2 emissions are a special category of indirect emissions. For many companies, purchased electricity represents one of the largest sources of GHG emissions and the most significant opportunity to reduce these emissions. Accounting for scope 2 emissions allows companies to assess the risks and opportunities associated with changing electricity and GHG emissions costs.

B1.4 Scope 3 Emissions

Scope 3 GHG emissions are the result of activities from assets not owned or controlled by the reporting company, but that the organisation indirectly affects in its value chain.

The GHG Protocol Corporate Value Chain (Scope 3) Standard [2] categorises the Scope 3 emissions into 15 distinct categories. Table B1.1 summarises the Scope 3 emissions from the indirect upstream (Category 1-8) and down-stream (Category 9-15) activities and outlines a brief description of each category.

B1.5 Calculation Methodology

The calculation of GHG emissions is done as follows:

[Activity Data] x [Emission Factor] = [GHG Emissions]

Where:

- **Activity data** is quantity or usage data in t/a, GJ/a, etc. It can be measured (e.g. from data received from a plant in operation) or calculated (e.g. from a mass balance model or stoichiometric chemical balance) or estimated (e.g. from published specifications on a vehicle type).
- **Emission Factor** is a factor or ratio that has been calculated by relating GHG emissions to a measure of activity at an emissions source. Emissions factors can be determined by experimental measurement, or published, generic emissions factors can be used from reputable organisations globally or locally. Published emissions factors can vary slightly.
- **GHG Emissions** are the mass of carbon dioxide and / or all equivalent greenhouse gases over a period of time, in units such as tCO_{2e}/a .

B1.6 NGER Emission Factors

The NGER emissions factors for stationary and mobile combustion are summarised in Table B1.2 [3].

B1.7 References

In this assessment, the most credible and applicable references for emissions factors, physical properties and conversion factors have been used.

The Australian National Greenhouse Accounts Factors (NGER) August 2021 emissions factors has been used as a source of emissions factors as PHGS is currently based in Australia and this will also allow for comparison with facilities in Australia.

All references for source data, physical properties, and conversion factors have been provided throughout the report.

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Emissions Factors

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Appendix D Data Tables

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Appendix E Selected Consolidation of Mobile **Equipment**

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E1 Selected Consolidation of Mobile Equipment

E1.1 GHG Protocol Chapter 4 page 33

"Selected Consolidation" approach, which was used to determine if up-and down-stream transportation of HBI and iron pellet are Scope 1 emissions.

E1.2 Leased Assets, Outsourcing and Franchises

The selected consolidation approach (equity share or one of the control approaches) is also applied to account for and categorise direct and indirect GHG emissions from contractual arrangements such as leased assets, outsourcing, and franchises. If the selected equity or control approach does not apply, then the company may account for emissions from the leased assets, outsourcing, and franchises under Scope 3. Specific guidance on leased assets is provided below:

E1.3 Using Equity Share or Financial Control

The lessee only accounts for emissions from leased assets that are treated as wholly owned assets in financial accounting and are recorded as such on the balance sheet (i.e. finance or capital leases).

The lessee only accounts for emissions from leased assets that it operates (i.e. if the operational control criterion applies). Guidance on which leased assets are operating and which are finance leases should be obtained from the company accountant. In general, in a finance lease, an organisation assumes all rewards and risks from the leased asset, and the asset is treated as wholly owned and is recorded as such on the balance sheet. All leased assets that do not meet those criteria are operating leases.

E1.4 The Selected Consolidation Approach

For the delivery of reagents to the Western Australian Port Hedland Green Steel Project from suppliers in Perth, it is assumed that PHGS will enter into contracts with transportation companies. It is assumed that these contracts will not constitute equity share, financial or operational control of the transportation companies' assets therefore their emissions will not form part of PHGS's Scope 1 emissions. They will be included in any calculation of PHGS's Scope 3 emissions.

Assuming all reagents are travelling from a facility not owned or operated by PHGS to the Port Hedland Green Steel Project in Western Australia, the emissions from this transport will need to be included as a Scope 3 contribution.

It is also assumed that, for the transport of HBI and Pellet products from the Port Hedland Green Steel Project to overseas Steel companies in Japan, Taiwan and South Korea, PHGS will enter into contracts with transportation companies and this impact will be included in the Scope 3 emissions.

Appendix F Emission Abatement Table

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Appendix G Safeguard Mechanism – Prescribed Production Variables and Default Emissions Intensities.

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G1.1 Safeguard Mechanism – Emission Intensity Values

The Safeguard Mechanism and National Greenhouse and Energy Reporting Act 2007 provides a framework for Australia's largest emitters to measure, report and manage their emissions.

The Department of Climate Change, Energy, the Environment and Water (DCCEEW) document outlining the production variables and default emissions intensities, referred to as the "Safeguard Mechanism document", is referred to in section 16 of the National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015 (Safeguard Rule). The purpose of this document is to define production variables for use in baselines made under the Safeguard Mechanism and determine what emissions are relevantly associated with each production variable in accordance with section 16 of the Safeguard Rule.

Production variable definitions and default emissions intensity values are published in Schedule 1 of the Safeguard Rule. Each production variable definition identifies the emissions sources that can contribute to the calculation of an emissions intensity value for the production variable.

There are three types of emissions intensity values:

- Default emissions intensity values: are set by the Government and published in the Safeguard Mechanism Rule. They represent the industry average emissions intensity of production, calculated in accordance with the Framework.
- Facility-specific emissions intensity values: are set by the Clean Energy Regulator, after an application by a responsible emitter. They represent the emissions intensity of production at an individual facility.
- Best practice (benchmarks): are set at international best practice, adapted for an Australia context, and apply to new facilities.

G1.2 Background – Defining Production Variables and Default Emission Intensities

The process of defining the production variables and default emissions intensity values was undertaken in accordance with the Framework for developing default production variables and emissions-intensity values (the Framework document). It involved extensive stakeholder consultation and independent technical expert review. As part of the reforms to the Safeguard Mechanism in 2023, production variables were reviewed to ensure they remain appropriate and effective in the context of shifting to declining baselines to contribute to Australia's emissions reduction targets.

G1.3 Background – Defining Production Variables and Emission Source Boundaries

Section 16 of the Safeguard Rule requires that when emissions are relevantly associated to production variables in an emissions intensity determination application, that must be done in a way that has regard to this document. This ensures that covered emissions are relevant to the default emissions intensity for that production variable.

It is intended that all scope 1 NGER-reported emissions from a facility can be assigned to a production variable. Where a facility produces multiple products, emissions must be apportioned in a justifiable manner, making sure no emissions are counted more than once and the total emissions counted cannot be more than the total emissions from the facility. In some cases, emissions from a particular process will need to be apportioned among two or more production variables.

The Safeguard Mechanism document provides guidance for businesses and auditors on the emissions sources used in the development of default emissions intensity values, which emissions sources can be used in facilityspecific emissions intensity calculations and how apportioning should be done. The Safeguard Mechanism document set out the emissions sources that were either included in or excluded

from default emissions intensity calculations and specify which emissions sources can be included in the calculation of a facility-specific emissions intensity value for a production variable.

The Safeguard document sets out the emissions intensity values for each production variable. Global Warming Potential values from the Intergovernmental Panel on Climate Change Fifth Assessment Report (AR5) apply to baselines that relate to 2020-21 and later years.

As part of the Safeguard Mechanism reforms in 2023, the Department reviewed production variables to ensure they remained appropriate and effective in meeting the emissions reduction objective.

G1.4 Production Variable - Primary Iron

In accordance with sections 14A and 19A of the Safeguard Rule, if a facility has primary steel as a historical production variable, an emissions intensity determination for that facility may specify a facility-specific emissions intensity number for primary iron using covered emissions relevantly associated with the primary iron (steelmaking) production variable.

G1.5 Production Variable Definition

- 1. Subject to subsection (4), tonnes of metallic iron products, excluding any gangue that:
	- a. are produced as part of carrying on the primary iron production activity at the facility; and
	- b. are exported from the facility; and
	- c. are of saleable quality.
- 2. The metric in subsection (1) is applicable to a facility that conducts the activity of the chemical and physical processing of iron feed materials into a crude iron product suitable for export from the facility Examples: Pig iron, hot briquetted iron (HBI), reduced iron and cast iron are each a crude iron product that may be suitable for export from a facility.
- 3. The activity in subsection (2) is the primary iron production activity.
- a. Example: The production of crude iron products from iron ore pellets using direct reduction.
- 4. For subsection (1), if the amount of coke oven coke imported into the facility to produce the metallic iron products is equal to or greater than 5% of the total amount of coke oven coke consumed in carrying on the primary iron production activity, then tonnes of metallic iron products are given by the following equation: metallic iron products = $Qp + 0.891$ Qi where:
	- a. Qp is the quantity of metallic iron products, in tonnes, that meet the requirements of subsection (1) and are not produced using coke oven coke imported into the facility.
	- b. Qi is the quantity of metallic iron products, in tonnes, that meet the requirements of subsection (1) and are produced using coke oven coke imported into the facility.
	- c. Note 1: Qp may or may not have been produced with coke oven coke.
	- d. Note 2: Qp and Qi do not need to be directly measured, they can be calculated from the consumed ratio of coke oven coke imported into the facility to coke oven coke used to produce metallic iron products that meet the requirements in subsection (1), multiplied by the quantity of iron produced using coke oven coke.

