ILLAWARRA COKE COMPANY PTY LIMITED
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Greenhouse and Energy Reporting Taskforce
Department of Climate Change
GPO Box 854
CANBERRA ACT 2601

Submission to Greenhouse and Energy Reporting Taskforce on Technical Guidelines for the Estimation of Greenhouse Emissions and Energy at Facility Level – Discussion Paper December 2007.

We refer to the National Greenhouse and Energy Reporting System – Technical Guidelines for the Estimation of Greenhouse Emissions and Energy at the Facility Level and thank you for the opportunity to make a submission.

Illawarra Coke would like to express an interest in participating in future detailed consultations and focus groups on the NGERS. We are particularly interested in consultation relating to permit allocation and the treatment of Trade Exposed, Emissions Intensive Industries; greenhouse gas emissions calculation methods; and energy definitions and reporting methodologies.

Yours Faithfully

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Submission to Greenhouse and Energy Reporting Taskforce on Technical Guidelines for the Estimation of Greenhouse Emissions and Energy at Facility Level – Discussion Paper December 2007.

The Illawarra Coke Company (ICC) is the only independent producer of metallurgical and foundry coke in Australia and has been privately owned since 1996.

Its two Cokeworks at Coalcliff and Corrimal (near Wollongong, NSW) produce approximately 250,000 tonnes of coke per annum using non-recovery technology. Coke has been produced continuously at ICC's two sites for over 90 years.

The company supplies premium grade metallurgical and foundry coke to Australian and overseas base metals producers principally for iron production for steelmaking, and for lead and zinc smelting.

Questions for feedback – Overview paper:

Attachment A: Stakeholder views are sought on whether the listed fuel types in Attachment A provide sufficient detail for companies to report on its fuel use? Should any additional fuel types be added?

The fuel types listed in Attachment A should be sufficient for ICC's reporting purposes.

Attachment B: Do companies have data systems in place to facilitate the reporting of equipment in use for the consumption of energy? Are the data systems in place to estimate the consumption of energy by equipment type? Company view are sought on whether the equipment type listings provided in Attachment B adequately cover the processes within your company? Does providing a breakdown of energy consumption at this level present any difficulties? Should this data be reported under the Act?

Providing a breakdown of energy consumption at the level of the listings provided in Attachment B would add considerable difficulty to the process of reporting energy consumption for ICC. The data systems are not in place for such reporting. ICC considers that reporting at facility, or possibly key-activity level for large facilities is the most appropriate level of detail for energy consumption data.

Attachment C – 7.1 General Methodology - Submissions are invited on the relative merits of the two approaches on this topic. Stakeholder view and preferences are sought on the different reporting options for electricity (Scope 2) emissions as outlined in the Attachment C box?

ICC considers that estimating Scope 2 factors based on electricity supplier contract information is preferable because it would allow benefit to be gained from seeking out low-emission suppliers and technologies.

Attachment C – Appendix 7.1 – State-Based annual average Scope 2 Emission factors – Should Scope 2 indirect emissions be estimated using default national or default state Scope 2 emission factors?

State-based Scope 2 emission factors are preferred by ICC.

Feedback – Discussion paper:

Section 3.3.3 – Activity Data - Table 4: Detailed concordance between UNFCC category 1A and ANZSIC categories

The ANZSIC codes in the NGERS Discussion Paper are different from those used in the National Pollution Inventory (NPI).

ICC's activities are currently classed as 2711 – *Basic Iron and Steel manufacturing* for NPI reporting according to the 1993 ANZSIC classification. The ANZSIC – 2006 equivalent of this classification is 2110 – *Iron Smelting and Steel production.*

ICCs interpretation of the discussion paper is that coke manufacturing should be reported using the ANZSIC (2006) classification of 1709 – *Coal coke manufacturing* in the energy industries. ICC considers that a single ANZSIC classification should be used for reporting to all government departments, and that the appropriate classification is 2110 – *Iron Smelting and Steel production.*

Section 3.9.2 – Solid Fuel Transformation (coke ovens) – UNFCCC 1.A.1c p 48

ICC recommends that this section be expanded to include a brief description of the coke making technology used by ICC (which ICC would be willing to provide).

This section currently contains a description of the coke making technology that is used in Australia as part of an integrated steel works. ICC's coke making technology is different to that described, and does not include the recovery or use any of the by-products mentioned in the description.