



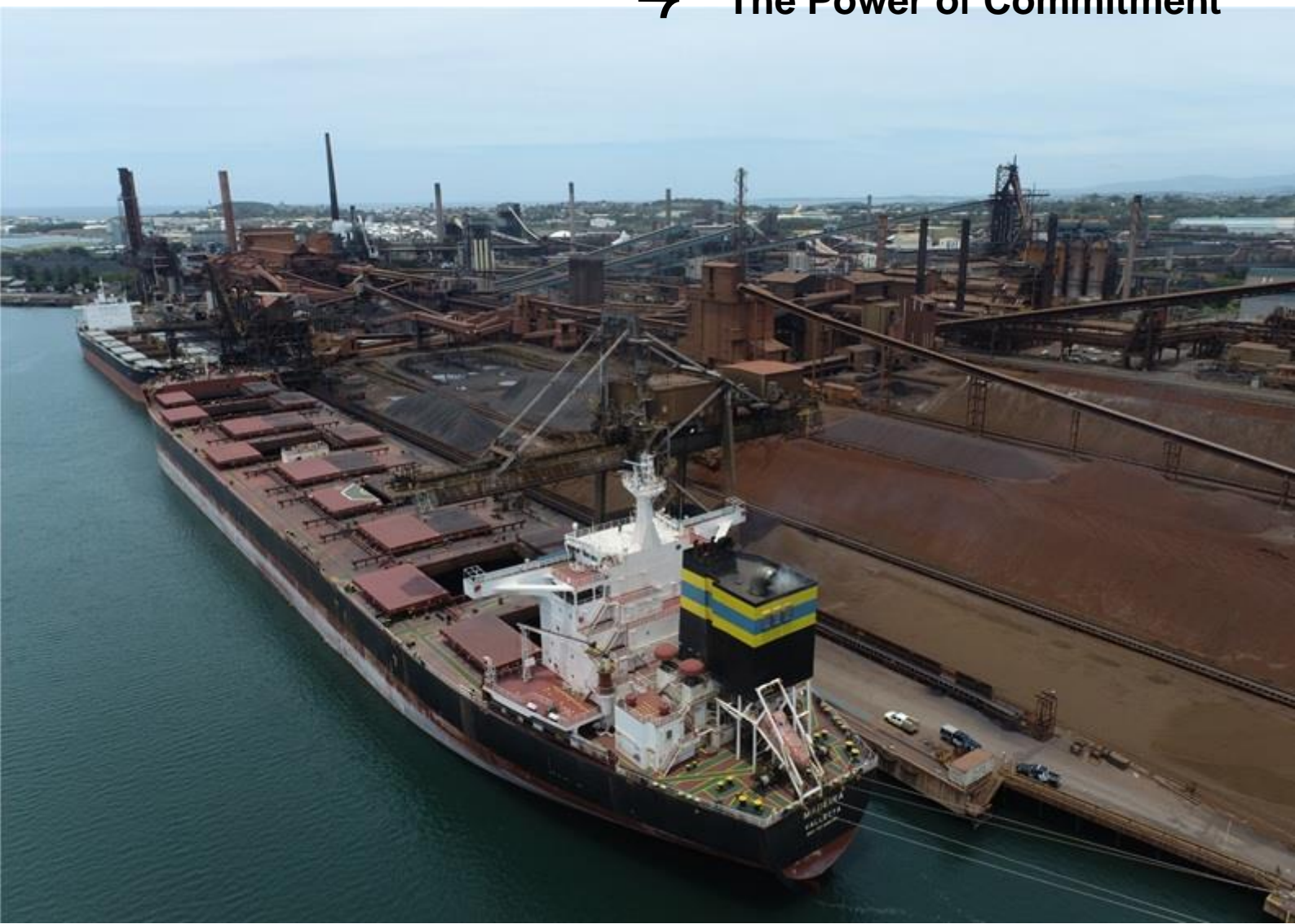
Commodity Logistics & Import Project

Response to Submissions

BlueScope Steel (AIS) Ltd

14 February 2023

→ **The Power of Commitment**



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Executive Summary

Introduction

BlueScope Steel (AIS) Pty Ltd (BlueScope) is proposing to upgrade the Port Kembla Steel Works (PKSW) raw materials berths 111, 112 and 113 (the Berths), including the unloading and conveying infrastructure through the Commodity Logistics and Import Project (CLIP) (the project). The project will include construction of a new continuous ship unloader (CSU), relocation of existing ship unloaders and new conveying infrastructure. These upgrades will allow BlueScope to import the required quantities of raw materials to support continued operations at the PKSW.

The project has been declared Critical State Significant Infrastructure (CSSI) in accordance with section 5.13 of the EP&A Act and clause 26, Schedule 5 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP).

The key objectives of the project are to:

- Maintain the quality of the PKSW metallurgical coal blend.
- Upgrade the BlueScope leased berths in Port Kembla to ensure continuous operations at PKSW are maintained.
- Improve supply chain contingency options and increase the materials handling capacity for all raw material inputs required to maintain existing steelmaking operations.

The project will enable BlueScope to maintain the provision of steel to the domestic and export markets and continue to provide economic benefit to the Illawarra region, and the State and national economies.

This Response to Submissions (RTS) report provides a summary of the submissions received during the exhibition of the environmental impact statement (EIS) and responses to the issues raised in those submissions to allow for a determination of the project by the NSW Minister for Planning.

Public exhibition and submissions

An EIS was prepared for the project and was placed on public exhibition between 18 November 2022 and 16 December 2022. The Department of Planning and Environment (DPE) received a total of 24 submissions during the exhibition of the EIS. Table E.1 groups the submissions received by submitter and whether they are in support, for comment, or objection. No objections to the project were received.

Table E.1 Summary of submissions received

Source	Support	Comment	Objection	Total
State agencies	-	4	-	4
Local council	-	1	-	1
Organisations and interest groups	1	-	-	1
Individuals	18	-	-	18
Total	19	5	0	24

Summary of key themes

A total of 47 issues were raised in the 24 submissions received. Of these, most issues raised were in relation to the positive economic impacts of the project. Figure E.1 provides a summary of the main issues raised in support of the project, and the proportion of each of these matters raised relative to the total amount of matters raised.

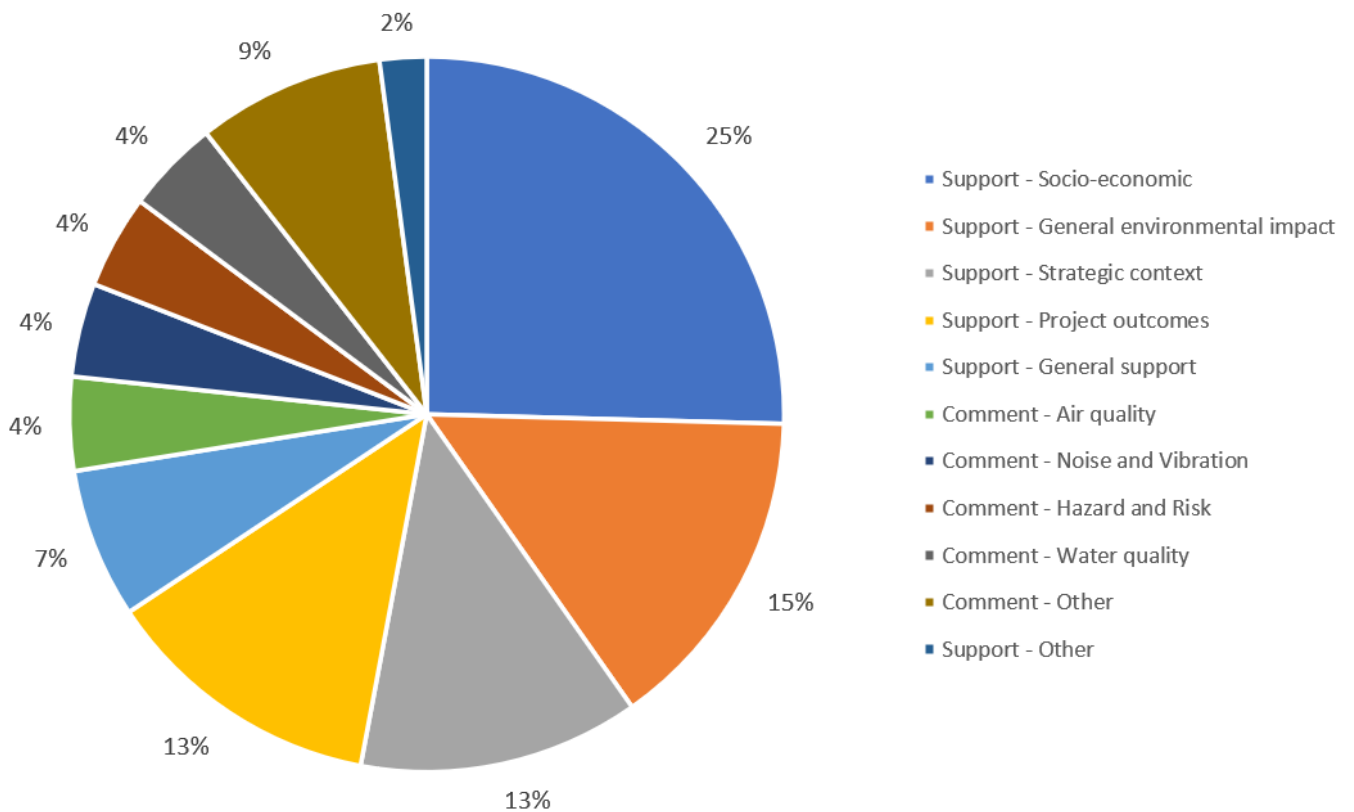


Figure E.1 Categories of issues raised

Support was primarily based on socio-economic factors, the role the project will play in maintaining steel making at the PKSW, and the positive benefits this will have on the local and regional economy through economic flow-on benefits and ongoing employment.

Project amendments

No amendments to the project as described in the exhibited EIS have been deemed necessary based on the submissions received.

Stakeholder engagement

Additional consultation undertaken following the exhibition of the EIS included community briefings, a public information day, and publishing information throughout news sources. No additional issues were raised during these activities.

BlueScope will continue to consult with the community during construction and operation of the project.

Conclusion

No objections to the project were received in response to the exhibition of the EIS. The project has been designed and assessed with regard to the matters for consideration under the EP&A Act and is consistent with the principles of ecologically sustainable development.

Through maintaining supply of critical bulk materials, the project will assist in securing the ongoing production of steel at PKSW, which is an important domestic source of steel for a range of construction and infrastructure projects that are of key importance to the Australian and NSW economies. PKSW also provides a significant contribution to the local economy, with the project facilitating the retention of approximately 4,500 jobs at the PKSW site itself, and supporting approximately 10,000 jobs in total including indirectly in supplier and customer businesses.

The project is therefore of strategic importance to ongoing operations at PKSW, which in turn makes a significant economic and social contribution to the region, State, and nation, including an economic contribution of around 1% of NSW's GSP, and the maintenance of sovereign manufacturing capability in Australia. The EIS and RTS have documented the potential environmental impacts of the project, considering both negative and positive impacts.

With the implementation of the proposed management and mitigation measures outlined in Appendix B, the beneficial effects of the project are considered to significantly outweigh any potential negative impacts.

Glossary and abbreviations

Term/ acronym	Definition
AQIA	Air Quality Impact Assessment
BCD	Department of Planning and Environment - Biodiversity and Conservation Division
BlueScope	BlueScope Steel (AIS) Pty Ltd
BSL	BlueScope Steel Limited
CCC	Community Consultative Committee
CEMP	Construction Environmental Management Plan
Council	Wollongong City Council
CSSI	Critical State Significant Infrastructure
CTMP	Construction Traffic Management Plan
DCP	Development Control Plan
DECCW	Department of Environment, Climate Change
DPE	Department of Planning and Environment
ESCP	Erosion and sediment control plan
EIS	Environmental Impact Statement
EMS	Environmental Management System
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
EPI	Environmental planning instrument
EPL	Environment Protection Licence
ERP	Emergency Response Plan
ESD	Ecologically Sustainable Development
GHD	GHD Pty Ltd
GHG	Greenhouse Gas
GSP	Gross State Product
HNSW	Heritage NSW
IPCC	Intergovernmental Panel on Climate Change
km	Kilometres
km/h	Kilometres per hour
m	Metres
m ²	Square metres
m ³	Cubic metres
ML	Megalitres
MNES	Matters of National Environmental Significance
mm	Millimetres
NIA	Noise impact assessment

Term/ acronym	Definition
NGER	National Greenhouse and Energy Reporting
NPfl	Noise Policy for Industry
NSW	New South Wales
NHVR	National Heavy Vehicle Regulator
OEM	Original Equipment Manufacturer
OEMP	Operational Environmental Management Plan
OSOM	Oversize Overmass
PFD	Process Flow Diagram
PHA	Preliminary Hazard Assessment
PKSW	Port Kembla Steel Works
Planning Systems SEPP	<i>State Environmental Planning Policy (Planning Systems) 2021</i>
R&H SEPP	<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>
RDA	Regional Development Australia
RTS	Response to Submissions
RWS	Recirculated Water System
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SSI	State Significant Infrastructure
SWMP	Soil and Water Management Plan
t	Tonnes
T&I SEPP	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>
TAG	Transport Access Guideline
TAHE	Transport Asset Holding Entity
TfNSW	Transport for NSW
Three Ports SEPP	State Environmental Planning Policy (Three Ports) 2013
WQIA	Water Quality Impact Assessment
WQMP	Water Quality Management Plan
5BF	No.5 Blast Furnace
6BF	No.6 Blast Furnace

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1. Introduction

1.1 Background

BlueScope Steel (AIS) Pty Ltd (BlueScope) is one of Australia's leading manufacturers and with its parent company, BlueScope Steel Limited (BSL), is a global leader in finished and semi-finished steel products. BlueScope's Port Kembla Steelworks (PKSW) operation in NSW includes two blast furnaces. No.5 Blast Furnace (5BF) is currently operating, while No.6 Blast Furnace (6BF) is currently in care and maintenance.

The majority of the coal used at PKSW for coking and blast furnace energy is sourced from South32 via its Appin and Dendrobium Coal Mines. The Bulli Seam coal (known as 1-seam coal) from Appin Colliery has different properties to the Wongawilli Seam coal (also known as 3-seam coal) from the Dendrobium Mine. The two coal types are mixed in a specific ratio to form a metallurgical coal blend known as the Illawarra Blend.

Based on the most recent information that BlueScope has received from South32, South32 may not be able to supply BlueScope with 3-seam coal after 2029, as there is uncertainty as to whether South32 will be able to access additional reserves at its Dendrobium mine after that date. Unless South32's inability to supply 3-seam coal can be addressed, thereby maintaining the quality of BlueScope's overall coal blend, BlueScope will need to blend the existing Appin coal with alternate third-party coal(s) primarily from Queensland to produce an equivalent and suitable metallurgical coal blend.

As there is no immediate replacement for the local 3-seam coal, BlueScope has determined that the importation of metallurgical coal from Queensland by ship will provide a suitable alternative source following the end of extraction of the 3-seam coal. BlueScope leases and operates five berths in Port Kembla Inner Harbour to import raw materials for use at PKSW. These berths are currently used to import minor quantities of coal, however the capacity to import additional coal and other raw materials via these berths is constrained by the existing ship unloading infrastructure.

BlueScope proposes to upgrade the PKSW raw materials berths 111, 112 and 113 (the Berths), including the unloading and conveying infrastructure through the Commodity Logistics and Import Project (CLIP) (the project). The project will include construction of a new continuous ship unloader (CSU), relocation of existing ship unloaders, and new conveying infrastructure. These upgrades will allow BlueScope to import the required quantities of raw materials and continue operation.

The project has been declared Critical State Significant Infrastructure (CSSI) in accordance with section 5.13 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and clause 26 of Schedule 5 of the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP). An environmental impact statement (EIS) has been prepared for the project and was placed on public exhibition between 18 November 2022 and 16 December 2022.

This Response to Submissions (RTS) report provides a summary of the submissions received during the exhibition of the EIS and responses to the issues raised in those submissions to allow for a determination of the project by the NSW Minister for Planning.

1.2 Project objectives

The key objectives of the project are to:

- Maintain the quality of the PKSW metallurgical coal blend.
- Upgrade the BlueScope leased berths in Port Kembla to ensure continuous operations at PKSW are maintained.
- Improve supply chain contingency options and increase the materials handling capacity for all raw material inputs required to maintain existing steelmaking operations.

The project will enable BlueScope to maintain the provision of steel to the domestic and export markets and continue to provide economic benefit to the Illawarra region, and the State and national economies.

1.3 Purpose and structure of this report

This RTS report has been prepared by GHD Pty Ltd (GHD) on behalf of BlueScope to support the application for approval of the project. The purpose of this document is to respond to submissions received for the project, as well as clarify the extent of potential impacts related to the project.

During exhibition of the EIS, the Department of Planning and Environment (DPE) received 24 submissions, comprised of 18 public submissions, one organisation submission, four letters of agency advice, and one submission from the local council. DPE has provided copies of these submissions to BlueScope. In accordance with section 5.17(6) of the EP&A Act, the Secretary requires the proponent to provide responses to the issues raised in the submissions.

This report has been prepared in accordance with the DPE guideline '*State significant infrastructure guidelines – preparing a submissions report*' (DPIE, 2022). The report is structured as follows:

- Chapter 1 introduction and background.
- Chapter 2 analyses submissions, including a breakdown of the agencies, organisations and individuals who made submissions, locations of submitters and a summary of the issues raised.
- Chapter 3 summarises actions taken since exhibition, including any project changes, community and stakeholder engagement, and further assessment.
- Chapter 4 provides an update of statutory changes since the exhibition of the project.
- Chapter 5 responds to issues raised by State agencies and local government.
- Chapter 6 responds to issues raised by organisations.
- Chapter 7 responds to issues raised by individuals.
- Chapter 8 provides environmental management measures.
- Chapter 9 provides an updated project justification.
- Chapter 10 provides a list of references.
- Appendix A includes a register of all submissions received, grouped by agencies, local councils, organisations, and individuals.
- Appendix B provides a list of management measures updated in response to issues raised in the submissions.
- Appendix C provides a summary of stakeholder engagement activities that have occurred immediately prior to, during and since the exhibition of the EIS.

2. Analysis of submissions

2.1 Overview

DPE received a total of 24 submissions during the exhibition of the EIS. Table 2.1 groups the submissions received by submitter and whether they are in support, for comment or objection.

Table 2.1 Summary of submissions received

Source	Support	Comment	Objection	Total
State agencies	-	4	-	4
Local council	-	1	-	1
Organisations and interest groups	1	-	-	1
Individuals	18	-	-	18
Total	19	5	-	24

The designation of submissions as being in support, comment or objection shown in Table 2.1 is based on the designation made by DPE on the Major Projects Website.

2.2 Submitters

The submissions received consist of:

- Government agencies:
 - NSW Environment Protection Authority (EPA).
 - Transport for NSW (TfNSW).
 - Department of Environment and Planning – Biodiversity and Conservation Division (BCD).
 - Port Authority of NSW.
- Local councils:
 - Wollongong City Council (Council).
- Organisations and interest groups:
 - NSW Ports.
- Submissions from individual community members:
 - 18 submissions from individual community members.

2.3 Categorisation of issues

In accordance with the guideline *State significant infrastructure guidelines – preparing a submissions report* (DPIE, 2022), GHD has grouped issues raised in submissions into one of five broad categories:

- Project (e.g., the site / corridor, the physical layout and design, uses and activities, timing).
- Procedural matters (e.g., level or quality of engagement, compliance with the Secretary’s Environmental Assessment Requirements (SEARs), identification of relevant statutory requirements).
- Economic, environmental and social impacts of the project (e.g., amenity, air, biodiversity, heritage).
- Justification and evaluation of the project (e.g., consistency of project with Government plans, policies or guidelines, support for the project).
- Issues that are beyond the scope of the project (e.g., broader policy issues) or not relevant to the project.

Table 2.2 sets out the subcategories of issues raised by the submissions received and to which of DPE’s five broad categories they relate, except for issues which are beyond the scope of the project.

Table 2.2 Issues sub-categories

Project	Procedural matters	Economic, environmental, and social impacts of the project	Justification and evaluation of the project as a whole
Strategic context	Legislative compliance	Social and economic	General support
Project options	Stakeholder engagement	Greenhouse gas and energy	Comments
Project need	-	Water quality	Agency acknowledgement
Project operation	-	Air quality	-
-	-	Traffic and transport	-
-	-	Noise and vibration	-
-	-	General environmental impacts	-

Appendix A provides a register of the submissions received and where in this report each submission has been addressed.

2.4 Summary of issues raised

A total of 47 issues were raised in the 24 submissions received. Of these, most were in relation to the positive economic impacts of the project or other positive aspects of the project. No issues were raised in objection to the project. Figure 2.1 provides a summary of the main issues raised in support of and comment on the project, and the proportion of each of these matters raised relative to the total amount of matters raised.

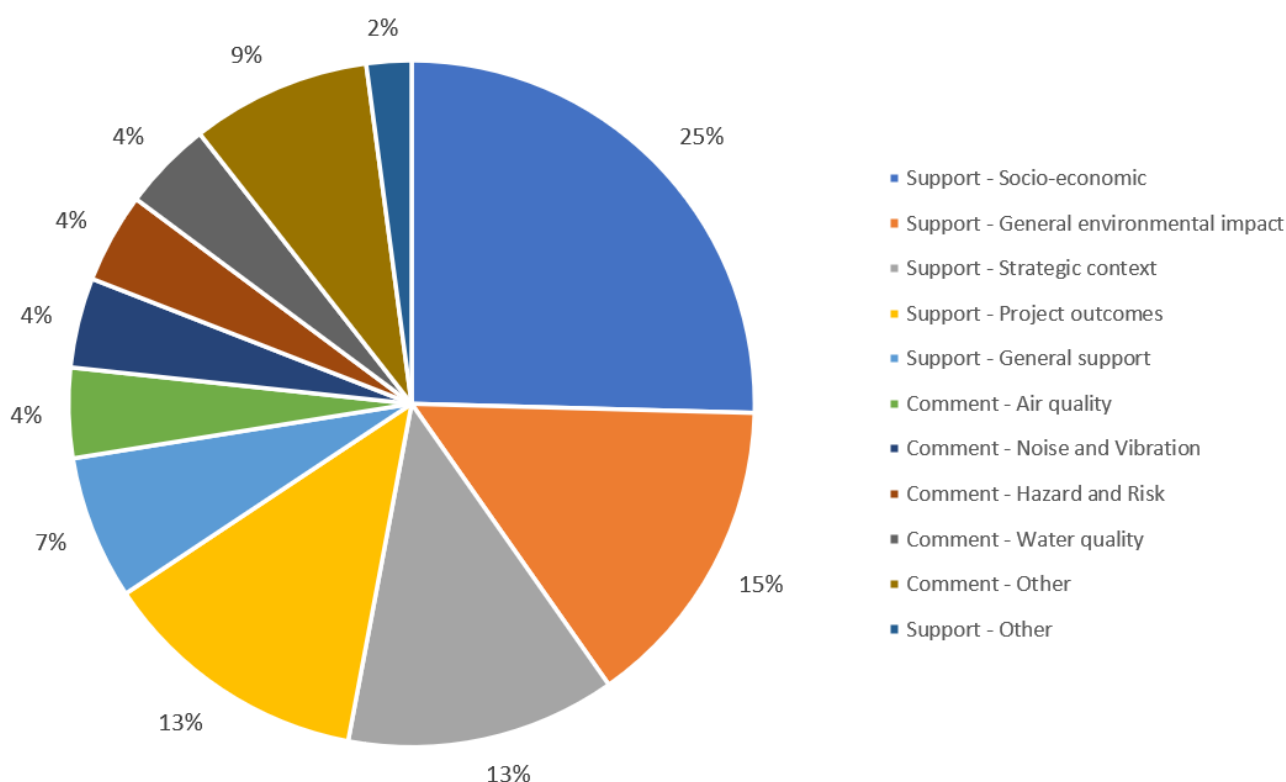


Figure 2.1 Categories of issues raised

Further analysis of the issues raised by organisations and individuals is included in Chapter 6 and 7 respectively.

2.5 Location of submitters

Submissions received have been categorised based on the location of the submitter. Location categories used were:

- Local (within 5 km of the project).
- Regional (between 5 – 100 km project).
- Broader (further than 100 km from the project).

Location of submitters is presented in Figure 2.2.

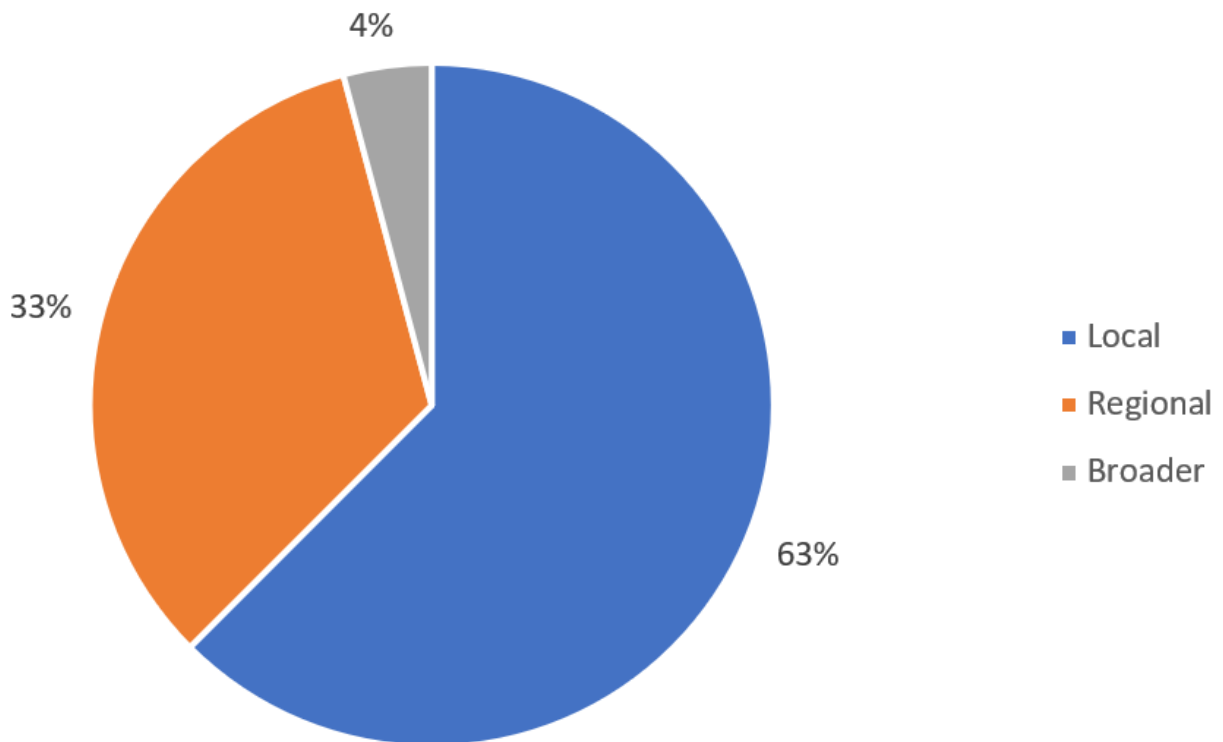


Figure 2.2 Location of submitters

3. Actions taken since EIS exhibition

3.1 Changes to the project

3.1.1 Preferred Project

There are no changes to the project forming the basis of the impact assessment described in detail in Chapter 5 of the EIS. Mitigation measures proposed for the project are detailed in Appendix B.

An overview of the project to provide context is set out in Section 3.1.2.

3.1.2 Project Overview

The project will involve upgrade of the raw materials berths, and unloading and conveying infrastructure, which will allow BlueScope to continue to import raw materials, including iron ore, scrap, coal and other materials for ongoing steelmaking operations. The project provides additional capacity for the import of supplemental coal following anticipated future depletion of supply from the Dendrobium Coal Mine and also increased scrap usage to assist with Greenhouse Gas (GHG) reductions.

The project includes construction of a new CSU at Berth 111, new conveying infrastructure to facilitate transportation materials from the berth to stockpiling areas, and modifications to the berth to allow the relocation of the existing Coke Loader and two Ship Unloaders, No.2 Ore Unloader (2OUL) and No.3 Ore Unloader (3OUL). The project includes the following major components:

- Installation of a new CSU at Berth 111.
- Relocation and modifications to 2OUL and 3OUL to operate across Berths 111, 112 and 113.
- Installation of new conveyors to allow the transportation of coal to the coal storage location (4 Area).
- New truck wash.
- Installation of foundations, crane rails, and relocation of the Coke Loader and its supply conveyors to Berth 113.
- Modifications to berth infrastructure and supporting services infrastructure.

Receival of coal and distribution to the Cokemaking area will be undertaken within existing PKSW transportation and materials storage areas.

As the utilisation of the berth is already near full capacity, the relocation of the Coke Loader, 2OUL, and 3OUL will be undertaken to manage the current shortfall in ship discharge capacity and to provide flexibility during outage periods caused by structural works. It is proposed to split the existing CLIP scope into 2 stages:

- Stage 1- Relocation of the Coke Loader and associated Ship Unloader movements.
- Stage 2- Installation of a CSU and associated conveyors.

A summary of the project is provided in Table 3.1.

Table 3.1 Project Summary

Project element	Summary
Relocation	<p>Modify existing 3OUL to allow it to operate on both Berth 111 and Berth 112 (enable CSU footprint).</p> <p>Modify existing 2OUL to allow it to operate on both Berth 112 and Berth 113 (after the installation of new crane rails).</p> <p>Coke Loader relocated to operate on Berth 113 (to enable footprint for 2OUL and 3OUL, allow greater flexibility across all three berths).</p>
Construction	<p>Construction of a new CSU to operate on Berth 111.</p> <p>New conveying infrastructure to deliver coal from the CSU to the permanent stockpiling location in 4 Area, including the separation of iron ore and coal during the conveying process.</p>
Access	<p>The majority of the construction traffic will access the site via Flinders Street and Old Port Road, connecting to the major roads that service the Port Kembla industrial area, including the Princes Motorway and Princes Highway, Shellharbour Road, Springhill Road, Five Islands Road and Masters Road. No changes to existing access arrangements are proposed.</p>
Ancillary construction facilities	<p>Various locations within the PKSW site within Lot 1 DP606434, Lot 71 DP1182824 and Lot 72 DP1182824, respectively.</p> <p>Temporary storage at Lot 1 DP 190251 and Lot 71 DP 1182824.</p>
Operation	<p>Operation of the Berths will be generally the same as existing operations including the processing and transportation of raw materials (iron ore, scrap, coal, limestone).</p> <p>3OUL will remain in service operating across Berth 111 and Berth 112.</p> <p>2OUL will remain in service operating across Berth 112 and Berth 113.</p> <p>Coke Loader (1OUL) will remain in service, but operations will be relocated to Berth 113.</p>
Waste	<p>Construction:</p> <ul style="list-style-type: none"> – Demolition waste – General construction waste – Excavation spoil – Scrap steel <p>Operation:</p> <ul style="list-style-type: none"> – Conveyor belts – Conveyor transfer point spillage
Workforce	<p>Construction: 80-100.</p> <p>Operation: Approximately 20 direct and 10 indirect FTE jobs as per existing operations.</p>
Construction work hours	<p>Where practical, and subject to the final construction program, construction will be carried out during the following construction hours:</p> <ul style="list-style-type: none"> – Monday to Friday: 7.00 am to 6.00 pm – Saturday: 7.00 am to 6.00 pm – Sundays and public holidays: no work <p>Some construction activities may need to be scheduled to be undertaken as night or early morning works depending on wind and weather conditions.</p>
Construction duration	<ul style="list-style-type: none"> – Stage 1: 1 – 28 months – Stage 2: 1 – 36 months <p>Period between stages to be confirmed based on operational requirements.</p>
Operational duration	Ongoing

3.2 Additional community and stakeholder engagement since EIS exhibition

A summary of consultation activities undertaken since the exhibition of the EIS is provided in Appendix C. Consultation activities did not raise issues outside of the scope of the issues raised in submissions.

4. Statutory context

A detailed analysis of the statutory requirements applicable to the project was provided in Chapter 6 of the EIS. The statutory requirements as presented in the EIS have been reviewed in the preparation of this RTS. The review identified that there have been no legislative changes which require further consideration in this RTS.

5. Response to State agency and local government submissions

This chapter provides a summary of issues raised by state and local government authorities and initial response to issues raised.

5.1 Environment Protection Authority

Comment

The EPA made the following comment:

The Environment Protection Authority (EPA) has reviewed the documentation provided for the Commodity Logistics and Import Project proposed by BlueScope Steel (AIS) Pty Ltd (BSL). The project involves upgrading raw materials management at berths 111, 112 and 113 and includes a new continuous ship unloader, relocation & modifications to the 2 existing ore unloaders, new coal conveyors to the coal storage area, a new truck wash at Number 4 Area, and relocation of the coke loader and its supply conveyors.

The project relates predominantly to the construction of infrastructure associated with berth operations at BSL. The use of the continuous ship unloader and enclosed conveyor(s) should realise reductions in air emissions from current operations.

The EPA and BSL have also been in ongoing discussions on coal stockpile dust controls for new and existing stockpiles. The EPA expects any new coal stockpiles to be fully enclosed or achieve an equivalent level of dust control. The proposal incorporates the existing Number 4 stockpile area. The Proponent has advised the EPA that suppressions sprays will minimise dust emissions for all coal stored in this area. The EPA accepts these controls for this proposal and has recommended an approval condition incorporating these dust controls.

In relation to construction noise, the proponent has requested:

- I. 24 hour construction where required, but will generally adhere to construction hours of 7:00am to 6:00pm Monday to Saturday, and at no times on Sunday or Public Holidays.*
- II. piling activities for between 14 to 16 hours per day and possibly at night-time.*

The EPA recommends that:

- I. standard construction hours be applied, with a caveat that construction works that satisfy the out of standard hours Interim Construction Noise Guideline (ICNG) Noise Management Levels are exempt from standard hours.*
- II. all piling activities be restricted to between the hours of 7:00am and 7:00pm Monday to Friday, and at no times on Saturday, Sunday or Public Holidays.*

The EPA also provided recommended conditions of approval.

Response

The EPA's comments are acknowledged. As noted by the EPA, there have been ongoing discussions with BlueScope regarding the project and the EPA generally accepted the proposed environmental controls including the proposed use of water sprays to manage dust in 4 area. The EPA has indicated that it expects all new material stockpiles to achieve a level of dust protection equivalent to being fully enclosed. For clarity, there are no new stockpiles proposed as part of the project. BlueScope has reviewed the proposed conditions of approval provided by the EPA with its submission and has no objection to the application of those conditions to the project.

5.2 Transport for NSW

5.2.1 General comments

Comment

TfNSW has identified the following areas that should be considered to achieve better outcomes for the road network.

- *TfNSW notes the (CLIP) Commodity, Logistics & Import Project is required to increase the materials handling capacity for raw materials to maintain existing steel making operations.*
- *TfNSW is generally supportive of this project based on the information in the EIS, however not enough information has been provided regarding OSOM routes.*
- *NSW Maritime NSW has reviewed the submitted documents and raised no concerns on the grounds of impact to safe navigation. It is important to note that the proponent, or any entity or contractor acting on their behalf, are not exempt from the provisions of the Marine Safety Act 1998, or any other relevant legislation, and all parties must comply with any direction given by NSW Maritime Authorised officers with regard to safe navigation or the prevention of pollution.*

Response

Responses to TfNSW's general comments are provided below:

- TfNSW's acknowledgement of the project requirements and general support for the project is noted, acknowledging their requirement for additional information regarding oversize overmass (OSOM) routes. Further detail regarding project OSOM movements is provided in Section 5.2.2.
- It is noted that NSW Maritime did not separately respond to the EIS exhibition and in contributing to the TfNSW submission, did not raise any concerns on the grounds of impact to safe navigation. Regardless, BlueScope acknowledges its obligations under the *Marine Safety Act 1998* in relation to safe navigation and prevention of pollution. To ensure that future activities proposed as part of the project meet port operator and navigational requirements BlueScope has and will continue to consult extensively with NSW Ports and the Port Authority of NSW. Both organisations expressed support for the project, acknowledged the ongoing consultation with BlueScope, and requested future consultation to which BlueScope has agreed. Refer to submissions from the Port Authority of NSW and NSW Ports in Sections 5.3 and 6.1 respectively.

5.2.2 Oversize overmass routes

Comment

TfNSW acknowledges that OSOM vehicles are likely to be used for the construction of this project. Further information is required to properly assess the application.

- *A detailed route survey is required to demonstrate the viability of the routes proposed and identify mitigation measures and strategies required.*
- *Any changes to the road network required to cater for OSOM movements (e.g., removal of infrastructure, widening works, vegetation removal, etc) must be outlined at this stage to assess the environmental impact of these ancillary works.*
- *TfNSW suggest discussions with the Special Permits Unit on 1300 656 371 to assess the appropriateness of the routes and identify potential issues. Early consideration of these matters may identify that the proposed routes are not viable, or simply help to avoid unexpected costs and delays at a later stage of the project. It should be noted that the issuing of Special Permit may be subject to route and bridge assessments.*
- *Consideration of the network and customer impacts of the OSOM, as well as heavy vehicle component of the project, is required, including but not limited to the following:*
 - *Proposed start date for the project.*

- Heavy vehicle breakdown mitigation strategies including the availability of a heavy vehicle tow contracted to recover network disruption and mechanic/tyre fitter availability to location, to expedite network disruption.
- Number of OSOM movements per day/week (prediction not indicated.)
- Identified routes for movement (both OSOM and heavy vehicle).
- Any correspondence that has been established with local authorities regarding use/impact/suitability of adjoining road infrastructure.
- Load restrictions on bridges along proposed routes
- Community consultation to date at this stage, and what has currently been circulated (if anything) to local residents.
- Consideration for further significant environmental impacts (weather events) which may force changes/suspension of works if roads deteriorate as a result.

Response

BlueScope acknowledges TfNSW's advice on the importance of early engagement with respect to potential OSOM vehicles and access routes. In connection with the project, BlueScope intends to undertake any required OSOM movements in a manner that minimises network impacts and avoids changes to the road network to cater for these movements wherever practical.

The manufacturer and geographic source of materials and equipment for the project which might require transport under an OSOM permit has not been confirmed at the time of publishing this report. Preliminary investigations indicate some oversize equipment will be trucked to PKSW, as outlined in Table 5.1.

Table 5.1 Indicative list of oversize equipment based on preliminary investigations

Item	Total Qty	Size	Anticipated Transport	Weight (ea)	Potential Manufacture Location
Berth Rail	86	192 kg/m x 12 m	Extendable trailer 12 m long	18.4 t	Whyalla
C01 Conveyor	140 m	15 m x 2.0 m x 1.2 m	Combination of extendable drop deck semi-trailer and extendable flatbed trailer	22 t	Fabrication workshop: – Illawarra – Sydney – Southern Highlands and/or – Newcastle
C02 Conveyor	65 m	15 m x 2.9 m x 3.2 m	Combination of extendable drop deck semi-trailer and extendable flatbed trailer	25 t	Fabrication workshop: – Illawarra – Sydney – Southern Highlands and/or – Newcastle
C03 Conveyor	42 m	15 m x 2.9 m x 3.2 m	Combination of extendable drop deck semi-trailer and extendable flatbed trailer	25 t	Fabrication workshop: – Illawarra – Sydney – Southern Highlands and/or – Newcastle
C04 Conveyor	191 m	15 m x 2.9 m x 3.2 m	Combination of extendable drop deck semi-trailer and extendable flatbed trailer	25 t	Fabrication workshop: – Illawarra – Sydney – Southern Highlands and/or – Newcastle

Item	Total Qty	Size	Anticipated Transport	Weight (ea)	Potential Manufacture Location
C05 Conveyor	175 m	15 m x 2.9 m x 3.2 m	Combination of extendable drop deck semi-trailer and extendable flatbed trailer	25 t	Fabrication workshop: <ul style="list-style-type: none"> - Illawarra - Sydney - Southern Highlands and/or - Newcastle
C06 Conveyor	289 m	15 m x 2.9 m x 3.2 m	Combination of extendable drop deck semi-trailer and extendable flatbed trailer	25 t	Fabrication workshop: <ul style="list-style-type: none"> - Illawarra - Sydney - Southern Highlands and/or - Newcastle

PKSW is well serviced by the NSW Oversize Overmass Load Carrying Network that extends to the potential manufacture locations from both the north and south of the site, and BlueScope is aware of restrictions on certain routes. Equipment entry to the site will be via the Recycling Area gate, accessed from Springhill Road, or the Stockpile Road gate, accessed from Flinders Street or Old Port Road. Springhill Road and Flinders Street are NSW Oversize Overmass Load Carrying Vehicles Network Approved Roads.

As noted above, the oversize equipment list is indicative only. Once suppliers have been confirmed and BlueScope has received detailed dimensions, weight and other characteristics, as well as the origin of the materials/equipment to be transported, BlueScope or its heavy haulage contractors will contact the Special Permits Unit to discuss requirements. It is understood that supporting information for permits may require route and bridge assessments. BlueScope is committed to working closely with the Special Permits Unit at the appropriate time to determine, and address, appropriate routes and permitting requirements.

5.3 Port Authority of New South Wales

Comment

The Port Authority of NSW made the following comment:

The proponent has been in consultation with Port Authority of NSW and the Port Kembla Harbour Master regarding various details of the proposal and has worked collaboratively on various aspects of the berth and loading/discharge infrastructure and berthing speeds. Port Authority requests that consultation continues with the Harbour Master through any detailed design.

Port Authority is generally supportive of the proposal and has no comments on the EIS.

Response

BlueScope acknowledges the Port Authority of NSW's support for the project and is committed to maintaining a collaborative working relationship with the Port Authority of NSW. BlueScope will continue to consult with the Port Authority of NSW on a regular and ongoing basis in relation to the project.

5.4 Biodiversity Conservation Division

Comment

BCD made the following comments:

As noted in our advice for the Environmental Assessment Requirements (DOC22/135191, 23/02/22), the development is proposed on flood prone land and should therefore be considered in accordance with the flood related SEARs and the NSW Government's Flood Prone Land Policy as set out in the Floodplain Development Manual, 2005 (FDM).

The proponent has since provided an Environmental Impact Statement (EIS) and a Water Impact Assessment (WIA) report for the site (GHD, Nov 2022), including a flood section. We have reviewed the EIS and WIA and have identified issues relating to the adequacy of flood risk considerations, consistency with the SEARs and the principles of the Floodplain Development Manual.

The WIA report claims that the site is not identified as being vulnerable to flooding which is contrary to the best available information in Wollongong City Council's adopted Allans Creek Flood Study (Advisian, 2019), available at <https://wollongong.nsw.gov.au/about/environment/floods-andstormwater/catchments/allans-creek-catchment>). It is understood that the proposal is not considered to impact on flood behaviour. However, incorporation of measures to minimise the risk to life in the event of a flood have not been considered as required in the SEARs.

The EIS has not adequately addressed the risks associated with public safety. The determining authority should ensure that risks to life and emergency management measures are considered for the proposed development over the full range of floods including those above the flood planning level up to the PMF.

Response

BCDs comments in relation to the level of flood assessment in the EIS are noted. BCD makes reference to the Floodplain Development Manual and the Allans Creek Flood Study. According to the latter, portions of the PKSW site, including parts of the project area would be subject to partial inundation during a 1% Annual Exceedance Probability (AEP) flooding event from Allans Creek. Refer to Figure 5.1. The 1% AEP flood level is the flood planning level in NSW and as such the appropriate level to assess flood risk to the project.

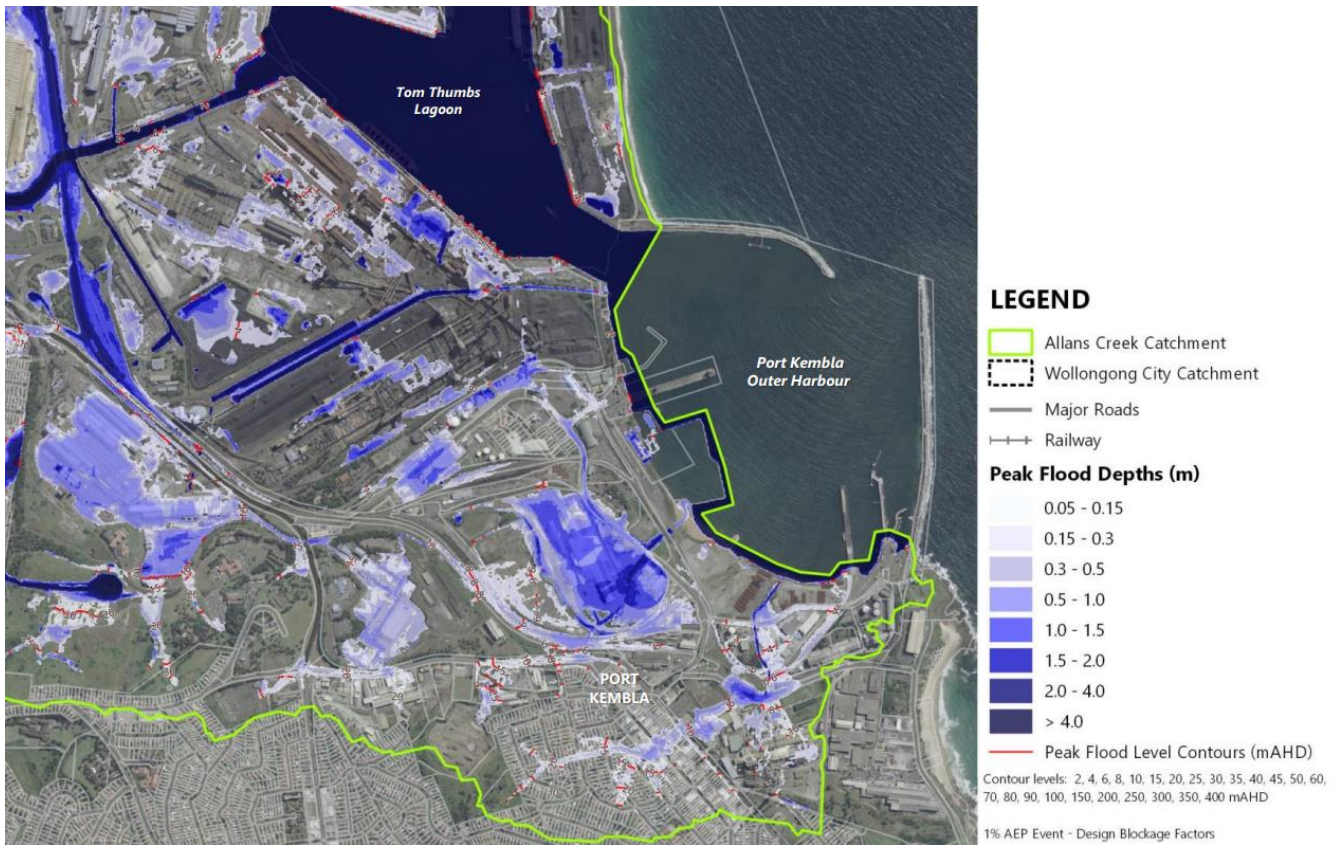
The Allans Creek Flood Study used hydrologic and hydraulic flood modelling to assess the potential floodplain risk for the Allans Creek catchment. Notably, the modelling did not incorporate the stormwater draining system that is in place across PKSW, and the comparison data used to validate the model does not include any data from within the PKSW footprint.

The locations identified as impacted during the 1% AEP event in the Allans Creek Flood Study are areas of existing water management structures including but not limited to No. 2 Blower Station drain, 4 area soak away pits, Ironmaking East Drain, Main Drain, and seep areas associated with the berths. These areas are not frequently accessed by site personnel.

The project does not include proposed changes to the existing hydrology of the project site and does not include any habitable buildings that may require a higher level of assessment. During both the 1% AEP and PMF events modelled in the Allans Creek Flood Study, there are flood free areas and established buildings on the site that can provide refuge to onsite personnel. Worker (employee and contractor) safety at PKSW is managed in accordance with comprehensive safety systems which include emergency management response plans.

Regarding public safety, the public has no access to the project area and therefore is not at any risk of exposure to flood hazards in the project area. The project area drains immediately to the base of the Allans Creek catchment, at the confluence with the Inner Harbour, or to the Inner Harbour directly. Therefore, there is no risk of increased flooding up stream, which may impact publicly accessible areas.

Based on the low level of flood risk within the project area, the nature of the project activities, lack of public access to the project area and there being no potential for the project to impact offsite flooding it is considered that an appropriate level of flooding assessment has taken place.



1% AEP EVENT PEAK FLOOD DEPTHS AND LEVELS

Figure 5.1 Allans Creek flood study 1% AEP map extract

5.5 Wollongong City Council

5.5.1 Noise and vibration

Comment

Noise and Vibration: Once 85% operational, noise validation at sensitive receivers must be conducted with a further noise validation assessment undertaken once 100% operational. The consent conditions should include that all works required to address any recommendations arising from that assessment to be actioned.

Response

The operational noise assessment concluded that the project specific noise criteria are unlikely to be exceeded at any of the representative receivers under any of the assessed scenarios. In addition to the assessment of the standard operating scenarios, an assessment of potential impacts to sleep disturbance was made in the event that a high-level noise event was to occur during the night. The assessed events represented atypical operating conditions which will not occur during standard operations. This provided for a conservative assessment and included modelling of the following events:

- Failure of a conveyor bearing, resulting in a SWL of LA1(1min) 120 dBA.
- Failure of a conveyor drive unit motor, gearbox or bearings, resulting in a SWL of LA1(1min) 120 dBA.

The NVIA predicted that even under these conservative and atypical operating conditions, sleep disturbance screening criterion is not exceeded at any of the residential receivers from worst-case maximum noise events.

Based on the outcomes of this assessment further validation at an 85% and 100% operational phase is not considered necessary, however, it is noted that BlueScope will continue to monitor and report PKSW noise in accordance with EPL 6092. This commitment is reflected in EIS management measure NV22 in which certain additional mitigations will be investigated should compliance monitoring under the EPL indicate a non-compliance.

5.5.2 Air quality

Comment

Air Quality Impact Assessment: Once 85% operational, modelling validation at sensitive receivers must be conducted with a further modelling validation assessment undertaken once 100% operational. Any consent conditions should include that all works required to address any recommendations arising from that assessment to be actioned.

Response

The Air Quality Impact Assessment (AQIA) modelled the potential impact of dust generation from the project on the local air shed. This modelling included consideration of airborne particles up to about 100 micrometres in diameter, known as Total Suspended Particulate (TSP) and particulate matter with a diameter of 10 micrometres or smaller (PM₁₀). The assessment found that the incremental impacts of the project will generally result in less than a 1% increase in TSP or PM₁₀ at the modelled receivers.

BlueScope has an established air quality monitoring system comprising of air quality monitoring stations (AQMS) at North Gate and Scouts Hall. This monitoring and subsequent reporting is undertaken in accordance with EPL 6092. Monitoring conditions include provisions for reporting of results, including any exceedances, and identifying corrective actions as necessary. This monitoring and reporting will continue to be in place during construction and operation of the project.

Additionally, it is noted that the cumulative assessment contained in the AQIA is considered conservative as background particulate concentrations were sourced from the maximum recorded value from either BlueScope's North Gate or Scouts Hall AQMSs. Use of this background data was considered conservative as it contains contributions from some existing emissions sources that would be replaced by the project and will therefore cease to cause emissions to air once the project is operational. As such, modelling validation at 85% and 100% operation is not considered necessary.

5.5.3 Water quality

Comment

Prior [to] the construction phase existing mitigation measures must be assessed and upgraded as needed to address possible water impacting events due to the increased construction activity. Additionally, during the operational phase it is recommended an assessment of the current mitigation measures in place to ensure capacity has/will not be overloaded during a water impacting event following the site changes.

Response

The EIS recommended measures to manage potential impacts to water. EIS management measure E1 recommended the preparation and implementation of a project specific construction Soil and Water Management Plan (SWMP). The SWMP will include proposed water management and erosion and sediment controls to be put in place and maintained during construction. It is expected that the preparation of the SWMP will form a condition of approval and DPE will be provided with the draft plan to review and comment on to ensure its suitability prior to construction.

In relation to the management of operational water quality, it is noted that there will be minimal change in the potential for water quality impacts to occur as a result of the project. With the proposed installation and use of conveyors to move bulk materials compared to this material being trucked through the BlueScope site currently, there will be less potential for materials to be tracked away from stockpile areas due to vehicle movements. The use of the existing water management system augmented as required for the proposed infrastructure is considered adequate to manage operational water quality impacts. As set out in EIS management measure E8, BlueScope is committed to continuing to meet the requirements of the site's existing operational water monitoring program requirements including continuing to meet the conditions of the EPL 6092.

5.5.4 Greenhouse gas

Comment

Council made the following comment in relation to greenhouse gas:

- *The greenhouse gas report supplied in relation to the Commodity Logistics and Import Project (CLIP) does not consider the wider and more immediate impacts of associated emissions. The CLIP is integral to the larger CSSI project involving the Blast Furnace #6 reline which will have significant prolonged emissions impacts for the region. Whilst the direct emissions from CLIP may be negligible in terms of PKSW's overall emissions, they are in addition to the larger project which will be a significant source of PKSW's overall emissions. Additionally, the report does not consider significant scope 3 downstream and upstream emissions including fugitive emissions from the extraction of the coal product and its use in the steel making process.*
- *The report does not consider the CLIPs impact on the NSW State Government's interim target of a 50% emissions reduction on 2005 levels and Federal interim target of a 43% on 2005 levels by 2030, ignoring the urgent emissions reductions required in the short term to achieve the recommendations of the IPCC report, as stated in section 4.2.1 Intergovernmental Panel on Climate Change. Additionally, the report does not consider the significance PKSW's operations and emissions have in a local context. The Wollongong City Council Climate Change Mitigation Plan 2020 is referenced however the region's emissions inventory is excluded being 7,974,000 t CO₂e for 21 FY. According to the information provided in section 5.2.3 Emissions Inventory, PKSW's Scope 1 & 2 contribution to this is 86%, the CLIP and associated larger projects will continue to have significant influence on this regional inventory and are not negligible in this context.*

Response

The greenhouse gas assessment submitted for the CLIP project addresses the project SEARs by assessing project related emissions. BlueScope acknowledges, as the Council submission notes, that the project is an important part of the overall 6BF reline project in that it will facilitate the supply of bulk materials to the blast furnace, however, emissions associated with the operation of the blast furnace have been assessed separately, and recently, in the Blast Furnace No.6 Environmental Impact Statement (GHD, 2022a) and the accompanying Blast Furnace No. 6 Reline Project Greenhouse Gas Report (GHD, 2022b) (6BF GHG report) as submitted to DPE under SSI-22545215. Read in combination with the 6BF GHG report, the project GHG assessment provides a holistic assessment of the PKSW GHG impacts and proposed management actions. In relation to Scope 3 emissions, consideration was given to a number of specific Scope 3 emissions while preparing the project GHG assessment. Ultimately, however, those scope 3 emissions were excluded from assessment due to their minor nature. Other scope 3 emissions were not assessed because they have been assessed as part of separate projects, for example as part of approvals for mines from which bulk materials are sourced.

BlueScope notes the Council's statement that the project greenhouse gas assessment does not fully consider, amongst other things, the significance of its emissions in a local context, however, the project greenhouse gas assessment specifically acknowledges the role BlueScope plays in meeting the Council's climate change objectives, in recognition of the significance of BlueScope's emissions. Further, the inclusion in the project greenhouse gas report of a comprehensive summary of the BlueScope Steel Limited's (BSL's) Climate Action Report, including BSL's goals to pursue net zero scope 1 and 2 emissions by 2050 (subject to the enablers described in the report), in BlueScope's view, provides a response to Council's statement that the project greenhouse gas assessment ignores the urgent emissions reductions required in the short term to achieve the recommendations of the IPCC report.

As a measure of the success of actions taken by BSL to date in meeting its climate change goals, since financial year 2018, there has been a 1.8% reduction in emissions intensity across all of BSL's steelmaking sites (in Australia, New Zealand and North America) and since 2005, the emissions intensity of its steelmaking sites has reduced by 21%. This improvement in emissions intensity sits alongside a reduction in absolute emissions from BSL's steelmaking sites of 28% since 2005. BlueScope and BSL continue to invest heavily in measures to reduce the GHG intensity of operations at the Port Kembla Steelworks and across BSL's global footprint respectively. Having regard to the steelmaking technology which is currently available at commercial scale, and the importance of steel in realising the transition towards an economy significantly less reliant on non-renewable energy sources (for example, large quantities of steel will be required for wind turbines and upgrades to transmission and distribution networks associated with increasing use of renewables), the CLIP project is considered to be consistent with the emissions reduction strategies not only of the Council but also of the NSW and Commonwealth governments.

5.5.5 Traffic and transport

Comment

Based on the documentation provided, there are not expected to be any significant adverse impacts to the local road network during construction or operation following completion. It is however noted that parking areas suggested for use during construction appear heavily used currently. It that regard it is not clear how the expected 100 construction vehicles per day anticipated are to be accommodated.

Response

Existing car parks located across the PKSW site currently have excess capacity and may be utilised for construction vehicle parking. As shown on Figure 5-7 of the EIS, ten ancillary facilities have been identified for use during construction activities. In addition to the existing car parks across the PKSW site which will be available to construction traffic, further parking areas will be demarcated within each of these ancillary facilities as required to accommodate the necessary level of parking. For example the Christy Street carpark is not fully utilised with the eastern portion having been out of service for approximately 10 years. An additional 50 parking spaces are being reactivated in this area to accommodate project traffic.

In EIS management measure TT1, BlueScope has committed to the preparation of a Construction Traffic Management Plan (CTMP). The CTMP will contain specific details for the management of construction parking and traffic and will be provided to DPE for review prior to construction.

5.5.6 Heritage

Comment

Council made the following comments in relation to heritage:

- *Heritage (Aboriginal) – an assessment of the likely Aboriginal impacts of the project including consultation with Aboriginal stakeholders having regard to the Aboriginal Cultural Heritage Consultation Requirements for Proponents (OEH, 2010).*
- *There is evidence of consultation with ILALC and Illawarra Aboriginal Corporation and the Environmental Impact Statement notes: The PKSW site does not contain known Aboriginal items or sites. The project will be undertaken on heavily disturbed, reclaimed lands. Excavations into natural material are not anticipated to be required to construct the project and therefore the likelihood of unexpectedly encountering Aboriginal heritage items is low.*
- *Heritage NSW should be consulted with and provide comment on whether Section 7.2.2 and 9.4.2 satisfactorily address the Aboriginal Heritage Sears Requirements. Council should be provided with these comments.*
- *No additional historic heritage matters are raised and Part 9.4.5 of the EIS satisfactorily considers potential impacts, noting there are no listed heritage items in the vicinity and the proposal involves the upgrade of infrastructure which post dates the 1960s-70s.*
- *The unexpected finds conditions proposed in the EIS are supported.*

Response

The following comments are made in response to Council's comments regarding heritage:

- Council's acknowledgement the EIS included an assessment of the project's potential to impact on Aboriginal heritage and that consultation with the ILALC has been undertaken is noted. Further to the evidence previously provided, BlueScope has undertaken and continues to undertake consultation with the ILALC on an ongoing basis as part of standard operations. This includes providing briefings to the ILALC regarding new projects as well as keeping the ILALC updated on projects as they move through construction and operational phases. BlueScope will continue to engage with the ILALC in this manner in relation to the project.
- In relation to consultation with Heritage NSW, DPE contacted Heritage NSW during the preparation of the SEARs at which point Heritage NSW indicated that it did not have any comment in relation to the project and that the project does not require any further referral to Heritage NSW.
- It is noted that the EIS satisfactorily assessed historic heritage and that there are a lack of historic heritage items in the vicinity of the project.
- Council's support for the implementation of the proposed unexpected finds procedure is acknowledged.

6. Response to organisation submissions

During the exhibition of the project one organisation submission was received. This was a submission in support of the project from NSW Ports. Details of this submission are provided in Section 6.1.

6.1 NSW Ports

Comment

Thank you for providing NSW Ports with the opportunity to comment on Critical State Significant Infrastructure 36408005 for the Commodity Logistics and Import Project (the Project) at Five Islands Road, Port Kembla. NSW Ports is responsible for managing the port and freight assets of Port Kembla, Port Botany, the Cooks River Intermodal Terminal and the Enfield Intermodal Logistics Centre. These assets, along with the efficient movement of freight to and from these assets, are critical to the future economic growth, liveability, productivity and sustainability of New South Wales and Australia. NSW Ports is supportive of the proposal as it provides social and economic benefits to the locality and is in the public interest.

Port Kembla is NSW's port of growth. Port Kembla is a key infrastructure asset for NSW and an economic driver in the Illawarra region. Port Kembla currently accommodates a range of dry bulk, bulk liquid and general cargoes. It is home to NSW's largest motor vehicle import hub and grain export terminal, and is the second largest coal export port in NSW. Port Kembla will be the next container port to service NSW. The diversification and strengthening of trade at Port Kembla is of vital importance and benefit to the people of NSW and the Illawarra.

As outlined in the Environment Impact Statement (GHD, 2022), the project is predominantly located within Lot 1 DP 606434 which is owned by BlueScope and is zoned IN3 – Heavy Industrial under the State Environmental Planning Policy (Transport and Infrastructure) 2021. The project will also be carried out on lots which are subject of a 99-year lease from the NSW Government to NSW Ports. Works on these lots is to be undertaken in consultation with NSW Ports and in accordance with relevant land access agreements.

The proposal meets our strategic objectives of growing port capacity to meet wider market demands and optimising the utilisation and productivity of existing port land and infrastructure, as identified in Navigating the Future: NSW Ports' 30 Year Master Plan. The Commodity Logistics and Import Project will provide new infrastructure to deliver more contingency, flexibility and better environmental and safety performance to the BlueScope operated berths.

NSW Ports supports the Commodity Logistics and Import Project.

Response

BlueScope acknowledges NSW Ports' support for the project. As the project will be partly undertaken on property managed by NSW Ports under its 99 year lease from the NSW Government, BlueScope appreciates that NSW Ports is a key stakeholder and commits to maintaining a collaborative working relationship through ongoing consultation.

7. Response to individual submissions

Submissions received by individual members of the community are made up of the following:

- 18 submissions in total
- 18 submissions in support

Within the 18 submissions, 33 issues were raised, all supportive of the project. A breakdown of these issues is presented in Figure 7.1.

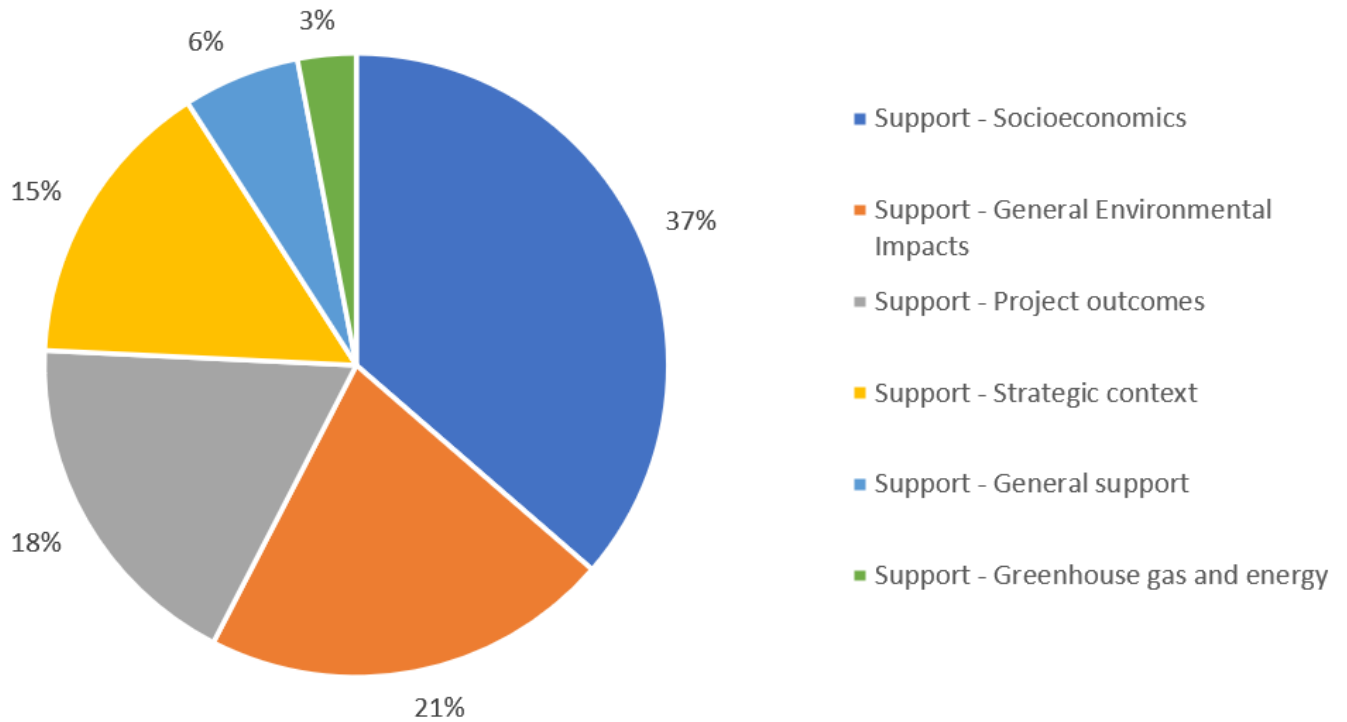


Figure 7.1 Breakdown of issues raised by individuals

A summary of the individual submissions received in support of the project is outlined in Section 7.1. Detailed responses to individual submissions which are comments or objections are outlined in Sections 7.1 to Section 7.2.

7.1 Summary of individual submissions in support

Table 7.1 provides a summary of the issues raised in individual submissions received supporting the project.

Table 7.1 Summary of individual submissions received in support

Issue raised in support	Number of times issues raised	Percentage of total issues raised in support of the project*
Socioeconomics	12	36%
General environmental impacts	7	21%
Project outcomes	6	18%
Strategic context	5	15%
General support	2	6%
Greenhouse gas and energy	1	3%

*rounded to the nearest percent

The project was strongly supported by the community based on the positive socio-economic benefit that the project will have as a key enabler of the continuation of steel making and the benefits this will have for residents of the Illawarra and the State of NSW. Support for the project was also expressed based on the environmental improvements for materials handling which will result from the project, such as improved air quality outcomes.

7.2 Summary of individual submissions in objection

No individual community member submissions were received in objection to the project.

8. Updated environmental management

8.1 Environmental management system

As detailed in the EIS, PKSW operates under an Environmental Management System (EMS) that is certified to the international environment management standard: ISO 14001:2015. The EMS includes a series of management plans and procedures to assess and mitigate environmental risks.

BlueScope also maintains a Pollution Incident Response Management Plan (PIRMP) as required under EPL 6092. EPL 6092 also stipulates the discharge points to air and water and monitoring requirements and limits for discharges from these points.

These plans will be reviewed to incorporate the environmental management commitments and any conditions of approval for the project.

All safeguards and management measures outlined in this RTS report will be managed by implementing a Project Environmental Management Plan. The Project Environmental Management Plan will manage the impacts of all stages of the project and will include the following sub plans:

- Construction Environmental Management Plan (CEMP) to address the impacts of the construction phase.
- Operational Environmental Management Plan (OEMP) to address the impacts of the operational phase.

Each of the above plans will be prepared prior to the commencement of each of the stages and will include but not be limited to the following:

- Roles of specific staff.
- Reporting requirements.
- Monitoring requirements.
- Environmental targets and objectives.
- Auditing and review timetables.
- Emergency response requirements.
- Details of training and inductions required.
- Complaint response procedures.
- Adaptive management mechanisms to encourage continuous improvement.

The above plans will also potentially contain sub-plans for specific issues such as erosion and sedimentation and construction traffic management plans.

8.2 Summary of safeguards and management measures

Environmental safeguards and management measures outlined in the EIS have been updated based on the comments received during the exhibition period. These safeguards will minimise any potential adverse impacts arising from the project on the surrounding environment. Where there have been changes to safeguards and management measures from the EIS, edits are shown in bold and new measures in highlighted rows.

9. Justification and conclusion

9.1 Strategic justification

The EIS included a detailed description of the project's strategic justification and merits confirming the need for the project to proceed. Specifically, the EIS included:

- Strategic justification – Section 11.1.1 of the EIS.
- The project's consistency with the objects of the EP&A Act – Section 11.1.2 of the EIS.
- How the project is consistent with the principles of ecologically sustainable development (ESD). Specifically:
 - The precautionary principle – Section 11.1.3 of the EIS.
 - Intergenerational equality – Section 11.1.3 of the EIS.
 - Conservation of biological diversity and ecological integrity – Section 11.1.3 of the EIS.
- A merits assessment in relation to the biophysical, economic and social costs and benefits of the project – Section 11.2 of the EIS.

The strategic justification, review against ESD principles and assessment of the project's merits provided in the EIS have been reviewed as part of this RTS. This review concluded that the justification as provided in the EIS remains applicable and that based on the outcomes of the EIS and RTS, the project should proceed at proposed.

9.2 Conclusion

The project is required to make feasible the import to PKSW of metallurgical coal from Queensland if and when 3-seam coal is no longer able to be supplied by South32 from its Dendrobium Coal Mine in the Illawarra escarpment. The project will also facilitate increased scrap import to assist in BlueScope's greenhouse gas reduction efforts, and improve supply chain contingency options and increase materials handling capacity for all raw material inputs to the PKSW.

The project will assist in securing the ongoing production of steel at PKSW, which is an important domestic source of steel for a range of construction and infrastructure projects that are of key importance to the NSW economy. PKSW also provides a significant contribution to the local economy, with the project facilitating the retention of approximately 4,500 jobs at the PKSW site itself and supporting approximately 10,000 jobs in total in the Illawarra region and across NSW, including indirectly in supplier and customer businesses.

The project is therefore of strategic importance to ongoing operations at PKSW, which in turn makes a significant economic and social contribution to the region, State, and nation, including an economic contribution of around 1% of NSW's GSP, and maintains sovereign manufacturing capability in Australia. The EIS and RTS have documented the potential environmental impacts of the project, considering both negative and positive impacts. BlueScope will implement measures to manage and mitigate negative environmental impacts as outlined in Appendix B such that the impacts will be minimised.

The project has been designed and assessed with regard to the matters for consideration under the EP&A Act and is consistent with the principles of ecologically sustainable development. With the implementation of the proposed management and mitigation measures, the beneficial effects of the project are considered to significantly outweigh any potential negative impacts.

10. References

Advisian. 2019. Allans Creek Flood Study.

BlueScope. 2021. Climate Action Report.

Commonwealth Government. 2021. Australia's Long-Term Emissions Reduction Plan.

DECC.2008a. Managing Urban Stormwater: Soils and construction - Volume 2.

DECC. 2009. Interim Construction Noise Guidelines.

DPIE. 2021. State significant infrastructure guidelines – Appendix C: preparing a submissions report.

EPA. 2014. Waste Classification Guidelines.

EPA. 2017. Noise Policy for Industry.

GHD. 2022a. No 6 Blast Furnace Reline and Operations Greenhouse Gas Assessment Report for BlueScope Steel (AIS) Pty Ltd.

GHD. 2022b. No 6 Blast Furnace Reline Project Environmental Impact Statement. Prepared for BlueScope Steel (AIS) Pty Ltd.

Hatch and BlueScope Steel. 2009. No. 5 Blast Furnace Reline Project – Environmental Noise Compliance Report.

IPCC. 2021. Summary for Policymakers of IPCC Special Report on Global Warming.

Landcom. 2004. Managing Urban Stormwater: Soils and construction - Volume 1.

NSW Government. 2005. Floodplain Development Manual.

NSW Government. 2020. NSW Climate Change Policy Framework.

11. Limitations

This report has been prepared by GHD for BlueScope Steel (AIS) Pty Ltd and may only be used and relied on by BlueScope Steel (AIS) Pty Ltd for the purpose agreed between GHD and the BlueScope Steel (AIS) Pty Ltd.

GHD otherwise disclaims responsibility to any person other than BlueScope Steel (AIS) Pty Ltd arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

Specifically, this Report does not take into account the effects, implications and consequences of or responses to COVID-19, which is a highly dynamic situation and rapidly changing. These effects, implications, consequences of and responses to COVID-19 may have a material effect on the opinions, conclusions, recommendations, assumptions, qualifications and limitations in this Report, and the entire Report must be re-examined and revisited in light of COVID-19. Where this Report is relied on or used without obtaining this further advice from GHD, to the maximum extent permitted by law, GHD disclaims all liability and responsibility to any person in connection with, arising from or in respect of this Report whether such liability arises in contract, tort (including negligence) or under statute.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report. GHD disclaims liability arising from any of the assumptions being incorrect.

GHD has prepared this report on the basis of information provided by BlueScope Steel (AIS) Pty Ltd and others who provided information to GHD (including Government authorities), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

Appendices

Appendix A

Register of submissions received

Table A1 Register of submissions – State Government Agencies

State Government Agencies	Issue Category	Issue Sub-category
Biodiversity Conservation Division (DPE)	Economic environmental social impacts	Hazard and risk (flooding)
	Economic environmental social impacts	Water (flooding)
Environmental Protection Authority	Economic environmental social impacts	Water quality
	Economic environmental social impacts	Air quality
	Economic environmental social impacts	Noise
Port Authority	Economic environmental social impacts	Socio-economics
Transport for NSW	Economic environmental social impacts	Traffic and transport

Table A2 Register of submissions – Local Government

Local Government	Issue Category	Issue Sub-category
Wollongong City Council	Economic environmental social impacts	Socio-economics
	Economic environmental social impacts	Greenhouse gas and energy
	Economic environmental social impacts	Biodiversity
	Economic environmental social impacts	Environmental management
	Economic environmental social impacts	Water quality
		Stormwater
Economic environmental social impacts	Traffic and transport	

Table A3 Register of submissions – Organisations

Organisations	Issue Category	Issue Sub-category
NSW Ports	Justification evaluation	General support

Table A4 Register of submissions – Individual

Individual submission	Issue Category	Issue Sub-category
Anita Rojas	Economic environmental social impacts	Socio-economics
Chris Zhang	Economic environmental social impacts	Socio-economics
Emilia Silvestru	Economic environmental social impacts	Socio-economics
Gregory Szloch	Economic environmental social impacts	Socio-economics
Jamie Silva	Economic environmental social impacts	Socio-economics
Justin Reed	Economic environmental social impacts	Socio-economics
Kerrie Noakes	Economic environmental social impacts	Socio-economics
Mark Dobbins	Economic environmental social impacts	Socio-economics
Reece Cullen	Economic environmental social impacts	Socio-economics
Steven Broussos	Economic environmental social impacts	Socio-economics
Name withheld	Economic environmental social impacts	Socio-economics
Name withheld	Economic environmental social impacts	Socio-economics

Individual submission	Issue Category	Issue Sub-category
Name withheld	Economic environmental social impacts	Socio-economics
Name withheld	Economic environmental social impacts	Socio-economics
Name withheld	Economic environmental social impacts	Socio-economics
Name withheld	Economic environmental social impacts	Socio-economics
Name withheld	Economic environmental social impacts	Socio-economics
Name withheld	Economic environmental social impacts	Socio-economics

Appendix B

Updated management measures

Where mitigation measures have been updated, they are shown as:

- Strikethrough = ~~deleted measures or text.~~
- Bold = **new text or edit to existing mitigation measures**
- Highlighted grey = **New measures.**

Table B.1 Consolidated list of management measures for CLIP project

Impact	ID	Measure	Timing
Air quality			
Dust management	AQ1	A dust management plan for use during construction activities will be prepared prior to works commencing.	Pre- Construction
	AQ2	Visual monitoring of construction work during dust generating construction activities or adverse weather conditions.	Construction
	AQ3	During demolition of any contaminated areas, extra measures (to be identified in the CEMP) will be implemented to prevent dust leaving the work area.	Construction
	AQ4	The construction contractor will be required to implement additional precautions to prevent dust leaving the worksite if visible plumes of dust are observed.	Construction
	AQ4	Dust generating activities will be ceased or reduced additional controls implemented if a visual plume of dust leaves the site or monitoring shows excessive particulate levels.	Construction
	AQ5	Operations conducted in areas with low moisture content material will be suspended during high-speed wind events or dust suppression will be used.	Construction
	AQ6	Stockpile sizes will be kept to the minimum practical.	Construction
	AQ7	Limit cleared areas of land and stockpiles, and clear only when necessary to reduce fugitive dust emissions.	Construction
	AQ8	Control on-site traffic by following specific routes for haulage and access in accordance with signposted speeds.	Construction
	AQ9	All trucks hauling material on roads external to the PKSW site will be required to be covered and to maintain a reasonable amount of vertical space between the top of the load and top of the trailer.	Construction
Operation air quality management	AQ10	Dust mitigation measures currently being implemented at PKSW will continue in project operation. These include: <ul style="list-style-type: none"> – Use of water cannons to provide dust suppression of the coal stockpiles in 4 Area during periods of high winds – Use of wheel wash at the exit of 4 Area to reduce wheel generated dust from haulage trucks transporting material around the PKSW site 	Operation
	AQ11	The CSU bucket-elevator unloading device and CSU conveyor system will be enclosed to prevent spillage and reduce dust emissions.	Construction Operation
	AQ12	Enclosure of conveyors as much as practicable to minimise dust emissions from conveyors.	Construction Operation
Noise and vibration			
Construction Noise and Vibration Management	NV1	A construction noise and vibration management plan (CNVMP) will be developed once a detailed construction methodology has been prepared. The plan will include: <ul style="list-style-type: none"> – Summary of the construction methodology. – Updated noise predictions at sensitive receivers if required. – A noise monitoring procedure and program for the duration of works. – Feasible and reasonable mitigation measures to be implemented to mitigated predicted impacts to sensitive receivers that may be noise affected. 	Pre-construction

Impact	ID	Measure	Timing
		<ul style="list-style-type: none"> – A community consultation plan to liaise with the noise affected receivers, including: <ul style="list-style-type: none"> • Notification to residences a minimum of 7 calendar days prior to the start of high noise generating works, including information such as total building time, what works are expected to be noisy, their duration, what is being done to minimise noise and when respite periods will occur. • A procedure for complaints, including maintaining a complaints register in accordance with existing BlueScope processes. 	
Site induction	NV2	<p>All project employees, contractors and subcontractors are to receive an environmental site induction. The site induction must at least include:</p> <ul style="list-style-type: none"> – All project specific and relevant standard noise and vibration mitigation measures – Relevant licence and approval conditions – Permissible hours of work – Any limitations on high noise generating activities – Construction employee parking areas – Designated loading/unloading areas and procedures – Site opening/closing times (including deliveries) – Environmental incident procedures 	Pre-construction Construction
At source mitigation measures – pre-construction	NV3	Quieter and less vibration emitting construction methods will be used where feasible and reasonable.	Pre-construction
	NV4	The noise levels of plant and equipment will have an operating sound power lower or similar to the levels presented in Table 8.17 of the EIS.	Pre-construction
At source mitigation measures - construction	NV5	Where practical, noise generating activities with potential to impact any nearby sensitive receivers will be scheduled during standard hours.	Construction
	NV6	<p>Piling will be undertaken between the hours of 7am and 7pm during standard construction hours where possible. Where piling is required during the hours of 10 pm and 7 am, works will be limited to an area at a minimum distance of 1,400 metres from the nearest residential receivers. If impact piling works are required during the hours of 10 pm and 7 am and Piling within 1,400 metres of residential receivers, noise monitoring will be undertaken at the source and at the most affected residential receivers to determine actual noise levels and determine any additional reasonable and feasible mitigation measures to reduce impacts.</p> <p>The EPA will be consulted if it is determined that piling is required outside of these time</p>	Construction
	NV7	As much distance as possible will be placed between the plant or equipment and residences and other sensitive land uses.	Construction
	NV8	Equipment with directional noise characteristics will be oriented away from noise sensitive receivers where possible .	Construction
	NV9	Non-tonal reversing beepers (or an equivalent mechanism) will be fitted and used on all construction vehicles and mobile plant regularly used and for any out of hours work. The use of ambient sensitive alarms that adjust output relative to the ambient noise level will be considered.	Construction
	NV10	Where additional activities or plant may only result in a marginal noise increase and speed up works, the duration of Impact will be limited by concentrating noisy activities at one location and moving to another as quickly as possible.	Construction
	NV11	Only the necessary size and power of equipment will be used if available.	Construction

Impact	ID	Measure	Timing
	NV12	Loading and unloading of materials/deliveries will occur as far as practically possible from sensitive receivers.	Construction
	NV13	The use of engine compression brakes will be limited in proximity to residences.	Construction
	NV14	Vehicles will be fitted with a maintained Original Equipment Manufacturer exhaust silencer or a silencer that complies with the National Transport Commission's 'In-service test procedure' and standard.	Construction
	NV15	Equipment will be regularly inspected and maintained to ensure it is in good working order. The condition of mufflers will also be checked. Equipment will not be operated until it is maintained or repaired, where maintenance or repair will address the annoying character of noise identified.	Construction
Out of hours work	NV16	All construction activities should be undertaken during standard construction hours, with the exception of the following activities (as specified in Table 2 of the ICNG): <ul style="list-style-type: none"> – The delivery of oversized plant or structures that police or other authorities determine require special arrangements to transport along public roads. – Emergency work to avoid the loss of life or damage to property, or to prevent environmental harm. – Maintenance and repair of public infrastructure where disruption to essential services and/or considerations of worker safety do not allow work within standard hour. – Public infrastructure works that shorten the length of the project and are supported by the affected community. – Works where a proponent demonstrates and justifies a need to operate outside the recommended standard hours. In the context of this project, the following activities could be considered appropriate to be conducted outside standard construction hours: <ul style="list-style-type: none"> – The delivery of oversized plant of structures. – Emergency work to avoid the loss of life or damage to property, or to prevent environmental harm. – Large crane lifts taking advantage of calm conditions. – Work required to be completed within tidal ranges. – Piling works at acceptable locations where the NML for noise sensitive receivers is not exceeded. – Works inaudible at residential premises 	Construction
	NV17	An out of hours works procedure will be developed as part of the construction environmental management plan NVMP for the project. This will include a detailed construction noise and vibration assessment for the potential construction activities proposed to occur out of hours.	Construction
	NV17	Out of hours movements will be minimised where possible. The need for out of hours work will be justified in the CEMP from the project and assessed against the noise requirements of the ICNG.	Construction
	NV18	Unless previously approved , approval in writing from the EPA will be sought for construction activities outside of the standard hours of construction per EPL 6092 requirements.	Construction
	NV20	An out of hours works application form for any works outside of the approved working hours for the project will be required where high-intensity construction equipment is proposed to be used, for submission to the EPA. These include, in accordance with license condition L6.2 of EPL 6092: <ul style="list-style-type: none"> — Pile driving — Jack hammering — Warning sirens 	Construction

Impact	ID	Measure	Timing
		Similar high intensity noise sources	
Noise validation	NV19	To check noise model predictions are representative of CLIP noise emission at sensitive receivers, noise validation measurements will be undertaken at intermediate locations in the path between source equipment and receivers. Nearfield source measurements will also be undertaken in order to confirm source noise levels and refine the noise model if required.	Operation
	NV20	If compliance noise measurements indicate that operational noise levels are above noise predictions, mitigation measures to conveyors, conveyor drive houses and the CSU may be considered for noise reduction, such as: <ul style="list-style-type: none"> – Low noise bearing alternatives for conveyors where suitable – Upgraded construction of enclosures for conveyor and conveyor drive units – Local shielding around identified noise components of the CSU 	Operation
Operational noise management plan	NV21	An operational noise management plan will be developed to minimise the risk of adverse noise impacts during the operation. It will be refined throughout the design process taking into account: <ul style="list-style-type: none"> – The relevant licence conditions. – Conditions of approval (to be confirmed). – The Noise Policy for Industry. – Australian Standards 1055 Acoustics – Description and measurement of environmental noise. – Approved methods for the measurement and analysis of environmental noise in NSW – currently in draft form. – Conclusions of verification noise monitoring prior to operations commencing. – The operational noise management plan should include: <ul style="list-style-type: none"> • Operational noise management measures to be implemented. • A complaints handling protocol as per existing BlueScope process. 	Operation
Hazard and risk			
Hazard and risk	HR1	Prior to construction starting, a site Construction Safety Management Plan will be completed. The Construction Safety Management Plan will include: <ul style="list-style-type: none"> – Procedures of isolation and evacuation of the fuel pipeline during relocation and fire management, including fire events at the bunker fuel pipeline. – A construction hazard assessment, identifying identify the proposed methodology of the site construction and/ or installation for hazardous situations. The detailed methodology will indicate the potential hazards and the control measures required to mitigate risks to as low as reasonably practicable during the construction stage. – A risk register produced from the construction hazard assessment which will be treated as a live document to be regularly reviewed during the construction phase. Any information considered to be relevant to the operational phase will be carried forward in the risk register. 	Pre-construction
	HR2	Existing conveyor design and safeguards will be utilised.	Pre-construction Construction
	HR3	Existing emergency management procedures will be updated where relevant.	Pre-construction Construction Operation
	HR4	Inspection and maintenance regime for conveyor systems will be implemented during operation.	Operation

Impact	ID	Measure	Timing
Water and hydrology			
Construction erosion and sediment	E1	Prior to construction commencing, a site-specific Soil and Water Management Plan (SWMP) will be prepared. The plan will include arrangements for managing wet weather events, specific controls and environmental inspection requirements. The SWMP will include an Erosion and Sediment Control Plan (ESCP) which will be prepared in accordance with the Blue Book -Managing Urban Stormwater: Soils and Construction (4th edition, Landcom, 2004) and Volume 2 (DECC, 2008).	Pre-construction
	E2	The ESCP will detail the erosion controls used for the project and where they will be established. The ESCP will include site specific measures to: <ul style="list-style-type: none"> – Prevent sediment moving off-site and sediment laden water entering any watercourse, drainage lines, or drain inlets – Prevent mixing of soils – Ensure soils are replaced in their pre-existing configuration during rehabilitation where possible – Reduce water velocity overland and capture sediment on site – Minimise the amount of material transported from site to surrounding pavement surfaces – Divert clean water around excavations where practical – Install measures and site entry and exit points to minimise movement of material onto public roads 	Pre-construction
	E3	Erosion and sediment controls will be established prior to works commencing on site.	Pre-construction
	E4	Erosion and sediment controls will be inspected on a regular basis and replaced when their function is compromised.	Construction
	E5	Soil from excavation generated will be reused where applicable. Excess spoil not required or able to be reused onsite will be disposed of appropriately as per the EPA's Waste Classification Guidelines (2014).	Construction
	E6	Vehicles will be restricted to existing access routes where practical.	Construction
	E7	Disturbed areas will be returned to pre-existing condition following the completion of construction, where practicable.	Construction
Operational water management	E8	Water monitoring programs under licencing or approval conditions will continue during operation.	Operation
Traffic			
Construction Traffic	TT1	A Construction Traffic Management Plan (CTMP) will need to be prepared prior to the commencement of works. The CTMP will provide: <ul style="list-style-type: none"> – Measures to minimise the impact of the construction vehicle traffic on the overall operation of the road network. – Measures to provide continuous, safe, and efficient movement of traffic for both the general public and construction workers. – Details regarding installation of appropriate advance warning signs to inform users of the changed traffic condition. – A description of the construction vehicles and the volume of these construction vehicles accessing the construction site. – Information regarding access arrangements and a description of the proposed external routes for vehicles, including the construction vehicles, accessing the site. – That all staff and subcontractors engaged on site will be required to undergo site induction. The induction will outline the requirements on the CTMP, including site access routes, environmental and occupational health and safety responsibilities, emergency procedures, potential carpooling opportunities and vehicle height restriction under the power lines, among others. 	Construction

Impact	ID	Measure	Timing
	TT2	Key stakeholders, including owners/operators of adjacent lands and emergency service providers, will be notified of any changes to the traffic management arrangements of public roads prior to the commencement of works.	Construction
	TT3	The construction site access will be reviewed during design development to consider the turn path required for the construction vehicles.	Construction
	TT4	Construction works to occur within the standard hours defined by the Interim Construction Noise Guideline (DECC, 2009) where practical. Some out of hours work may be required to undertake certain tasks	Construction
	TT4	Truck drivers will be directed to follow the predetermined haulage routes.	Construction
	TT5	Workers required to undertake works or traffic control will be suitably trained and hold the required accreditation to carry out works on site and will also be site inducted.	Construction
	TT6	Protection will be provided to workers and road users through advanced warning of roadworks, speed changes, safety barriers with adequate offsets and deflection allowance, where necessary.	Construction
	TT7	Site access will be restricted to authorised project personnel and existing employees on site.	Construction
	TT8	Roadwork speed zones must be logical, credible, and enforceable. They should only be used where they are self-enforcing or will be enforced. Roadwork speed zones will be used with traffic control signs and devices and should not be used in place of more effective traffic controls. They will be used only while road works are in progress or the lower speed road conditions exist.	Construction
	TT9	The following environmental requirements should be adhered to: <ul style="list-style-type: none"> – All vehicles transporting loose materials on public roads will have the entire load covered and/or secured to prevent any large items, excess dust or debris depositing onto the roadway during travel to and from the site, including but not limited to construction rumble strips/wheels wash at the site egress location. – Vehicles operating to, from and within the site shall do so in a manner, which does not create unreasonable or unnecessary noise or vibration. – Public roads and access points will not be obstructed by any materials, vehicles, refuse skips or the like. 	Construction
Soils, geology and groundwater			
Acid Sulphate Soils	S1	If ASS are disturbed during excavations, they will be managed as per the Acid Sulphate Soils Manual (ASS MAC, 1998).	Construction
Contamination	C1	An incident emergency spill plan will be detailed in the CEMP.	Pre-construction
	C2	Spill response kits will be provided on site and will be located in a clearly defined location.	Construction
	C3	Plant and machinery will be inspected regularly to ensure that they are in sound working order.	Construction
	C4	If soils that appear to be contaminated are exposed during construction of the project, works will cease in the area until further investigation can be undertaken. The following factors are indications of potential contamination on site: <ul style="list-style-type: none"> – Stained or discoloured fill – Hydrocarbon or chemical odour 	Construction

Impact	ID	Measure	Timing
		Contaminated soils requiring disposal will be classified under the Waste Classification Guidelines (EPA,2014) prior to disposal.	
	C5	All chemical/fuel storage and loading areas will be bunded or otherwise contained.	Construction, Operation
	C6	All plant personnel that may encounter chemicals/fuels will be trained in required handling procedures.	Construction, Operation
Biodiversity			
General biodiversity	B1	<ul style="list-style-type: none"> – Measures proposed in the SWMP will be implemented to ensure appropriate sediment control measures are put in place to ensure run-off during construction does not result in indirect impacts to surrounding habitats. – Construction machinery will be cleaned prior to entering and leaving site to ensure weed propagules are not transported. – Clearing of trees will be restricted to the trees identified in the Tree Clearing Report. – Laydown areas will be placed on existing hardstand, and where possible, as far away from drainage lines and places where surface water can pool. – These measures will be implemented in the CEMP and may be revised at any time to manage potential environmental impacts. 	Pre-construction Construction
Green and Golden Bell Frog	B2	All measures outlined in <i>Management of Threatened Species, The Green and Golden Bell Frog, Litoria Aurea (BlueScope, 2020)</i> will be implemented during construction of the project.	Construction
	B3	All relevant workers will be trained in the procedures outlined in <i>Management of Threatened Species, The Green and Golden Bell Frog, Litoria Aurea (BlueScope, 2020)</i> and their responsibilities under the BC Act and EPBC Act in the project induction. This will also be discussed periodically during the toolbox talks or through group refresher training sessions.	Construction
	B4	If a Green and Golden Bell Frog is found in the project site or laydown area, work in the vicinity will cease immediately. Work will not recommence until clearance from a qualified ecologist can be provided. Following confirmation of the sighting of Green and Golden Bell Frog either by a local ecologist or by means of identification using the Green and Golden Bell Frog Audit / Inspection Checklist, the sighting must be registered with the EPA and NSW BioNet Species sightings via the web or telephone.	Construction
Unexpected species discovery	B5	If other endangered species are discovered on the project site or in laydown areas, work will cease in the vicinity and a qualified ecologist will be employed to assess the discovery. Additional mitigation measures presented by the ecologist will be incorporated into the CEMP. Work in the area will not commence unless clearance is given by the ecologist.	Construction
Aboriginal heritage			
Unexpected Aboriginal heritage finds	AH1	In the event of an unexpected find of potential Aboriginal object/s (or suspected item), work will cease in the area and DPE will be notified. Works will not recommence until continuation is authorised by DPE.	Construction
Historic heritage			
Unexpected finds	HH1	In the unlikely event that unexpected historical (non-Aboriginal) archaeological remains are discovered during works they will be managed with reference to the standard protocols and procedures of section 146 of the <i>Heritage Act 1977</i> .	Construction

Impact	ID	Measure	Timing
Visual amenity			
Visual amenity – construction works	LV1	Temporary boarding, barriers, traffic management and signage will be removed when no longer required.	Construction
	LV2	Roads providing access to the site and work areas will be maintained free of dust and mud as far as reasonably practicable.	Construction
	LV3	Materials and machinery will be stored neatly during construction works.	Construction
	LV4	Ensure any temporary lighting required during the construction period is sited and designed to avoid light spill into the surrounding area.	Construction
	LV5	Utilise existing site features as screening when positioning plant where practical.	Construction
Light spill	LV6	Lighting to be designed installed and operated in accordance with <i>Australian Standard 4282-1997 Control of the Obtrusive effects of outdoor lighting</i> .	Detailed design and operation.
Land use and property			
Land use	LU1	A CEMP will be developed to manage and mitigate impacts generated by the construction of the project.	Pre-construction Construction
	LU2	BlueScope will coordinate project activities to minimise the impact to land use and services within the PKSW site.	Construction
Property	P1	BlueScope will consult with NSW Ports prior to works on Lot 71 DP1182824 and Lot 72 DP1182824.	Pre-construction
Social and economic			
Investment and employment	SE1	A contracting and procurement strategy focusing on maximising local content and implementation of BlueScope's First Nations Strategy for indigenous employment will be implemented where possible to support local employment and business opportunities during construction. During operation, the project will seek to work with interested local parties to fulfill workforce requirements.	Construction, operation
Community engagement	SE2	The project will include a comprehensive, multi-stakeholder engagement program to inform decisions regarding the project.	Construction
	SE2	A Community Consultative Committee (CCC) will continue to be operated by BlueScope for PKSW.	Construction
	SE3	BlueScope's public website will provide a contact number and email address for the community to provide comments on throughout the project.	Construction
Amenity	SE5	BlueScope will ensure that measures discussed in other sections that reduce environmental impacts are implemented effectively for the duration of the project.	Construction, operation.
Greenhouse gas and energy			
Construction GHG emissions	GHG1	All plant and equipment used during the construction works will be regularly maintained to comply with the relevant exhaust emission guidelines.	Construction
	GHG2	Sustainable procurement practices will be adopted where feasible.	Construction
	GHG3	Where reasonable and feasible, measures to be implemented by contractors will include, but not be limited to: <ul style="list-style-type: none"> – Construction materials sourced locally where possible – Construction materials with high recycled content, such as supplementary cementitious materials in concrete, reclaimed asphalt pavement in asphalt and post post-consumer recycled content in steel will be procured for the project where practical 	Construction

Impact	ID	Measure	Timing
		<ul style="list-style-type: none"> – Construction materials that are low maintenance and durable will be sourced where practical – Plant and equipment will be switched off when not in constant use and not left idling – Plant and equipment brought onsite will be regularly serviced and energy efficient vehicles or equipment will be selected where available – Any plant and equipment that is not working efficiently (e.g. emitting excessive smoke) will be repaired or replaced as soon as possible – Construction works will be planned to ensure minimal movement of plant and equipment, including barges – Opportunities for the reuse/recycling of other construction and demolition waste materials to be investigated and included in construction management plans, where feasible 	
Waste management			
Construction waste	WM1	<p>A waste management plan for the project will be prepared prior to construction commencing. The waste management plan will detail:</p> <ul style="list-style-type: none"> — Statutory requirements for waste in NSW — Measures for separating waste based on classification of management options including colour coded bins – Options for off-site reuse, reprocessing, recycling and energy recovery <p>The project will comply with BlueScope’s existing Waste Management Procedure (DIV-AR-RS-01)</p>	Pre-construction
	WM2	Awareness of waste minimisation practices will be included in the project induction.	Construction
	WM3	Waste will be classified, managed and disposed of in accordance with the <i>Waste Classification Guidelines</i> (EPA, 2014).	Construction
Operational waste	WM4	Operational waste streams will continue to be managed in accordance with EPL 6092.	Operation
	WM5	Recycling and resource recovery activities will continue throughout the life of the project.	Operation
Cumulative impacts			
General impact reduction	CI4	The mitigation measures presented in Appendix C will be implemented effectively to reduce the project’s impact on the environment.	Pre-construction Construction Operation

Appendix C

Stakeholder engagement table

Table C.1 Stakeholder engagement immediately prior to and during EIS exhibition

Date	Stakeholder	Engagement method	Project specific outcomes and feedback
29 September 2022	Inside Industry	Project briefing	<ul style="list-style-type: none"> – BlueScope engaged with members of Inside Industry Board on the project via ongoing quarterly partnership meetings and monthly Board meetings – This included updating representatives on proposed major projects at PKSW – The Board indicated their strong support of the project and other major projects proposed at PKSW – Key considerations noted regarding the project included any potential impact the Inside Industry’s public tours during the construction phase – While impacts are unlikely to occur, this feedback has been included for consideration during the proposed construction phases of the project
4 October 2022	EPA	Project briefing	<ul style="list-style-type: none"> – To update the EPA on the status of the Project, including outlining any key environmental aspects resulting from the progress of technical studies, understand any concerns, and receive feedback prior to lodging the project EIS – Meetings were held as part of BlueScope’s ongoing meeting cadence scheduled with the EPA where updates were provided on all NSW-based Major Projects – No concerns were raised in relation to CLIP
13 October 2022	BlueScope Community Consultative Committee	Project briefing	<ul style="list-style-type: none"> – Provide update on the Project and discuss other Major Projects at BlueScope – Minutes of the meeting are published on the www.bluescopeillawarra.com.au website
19 October 2022	NSW Office of Environment and Climate Change (OECC)	Project briefing and site visit	<ul style="list-style-type: none"> – The meeting was held following a previous meeting request (19 August 2022) to run a site tour and Major Project briefing with representatives from OECC – A total of 10 attendees participated in the site visit and briefing – Senior BlueScope representatives provided an update on the status of all BlueScope Major Projects in NSW – No concerns were raised regarding the project
27 October 2022	Inside Industry	Project briefing	<ul style="list-style-type: none"> – BlueScope representatives provided an update on the project to advise the technical assessments were close to being finalised as part of the EIS and further updates would be shared at the next meeting – No concerns were raised
22 November 2022	EPA	Project briefing	<ul style="list-style-type: none"> – To update the EPA on the status of the project, including outlining any key environmental aspects resulting from the progress of technical studies, understand any concerns, and receive feedback prior to lodging the project EIS – Meetings were held as part of BlueScope’s ongoing meeting cadence scheduled with the EPA where updates were provided on all NSW-based Major Projects – No concerns were raised in relation to CLIP

Date	Stakeholder	Engagement method	Project specific outcomes and feedback
22 November 2022	All stakeholders / shareholders	BlueScope Annual General Meeting	<ul style="list-style-type: none"> – An update on the project was shared at BlueScope's AGM – The AGM was attended by more than 400 registered participants and was held in Wollongong, NSW – The AGM presentation is available at www.bluescope.com
24 November 2022	Inside Industry	Project briefing	<ul style="list-style-type: none"> – BlueScope representatives provided an update on the project to advise the EIS had been submitted to DPE and would be placed on public exhibition in early December 2022 – No concerns were raised
24 November 2022	NSW Office of Environment and Climate Change (OECC)	Working Group meeting	<ul style="list-style-type: none"> – As part of an established ongoing working group meeting between representatives at BlueScope and OECC, BlueScope shared an update on the status of the Project advising the EIS would soon be on public display in December 2022 – No concerns were raised
3 December 2022	BlueScope employees	Notification of public exhibition of project distributed to all sites/shifts at Port Kembla Steelworks	<ul style="list-style-type: none"> – The notification was acknowledged through 'likes' and sharing of post/information – No concerns were raised
7 December 2022	All Illawarra stakeholders	Newspaper advertisement of community information session (available online and through print) via the Illawarra Mercury	<ul style="list-style-type: none"> – A prominent third page advertisement was placed in the Illawarra Mercury on page 3 of the paper on 7 December 2022 – The ad highlighted key details of the community drop-in session including high-level overview of the project, details of timing and venue, notice of project being on public exhibition and contact details for further information
7 December 2022	All stakeholders	Website update with details of Community Information Session	<ul style="list-style-type: none"> – Details of the Project Community Information Session were provided on the BlueScope Illawarra website
8 December 2022	BlueScope Community Consultative Committee	Project briefing	<ul style="list-style-type: none"> – Provide update on the Project and discuss other Major Projects at BlueScope – The Committee were advised of the upcoming Community Information Session, including being provided copies of the advertisement featured in the Illawarra Mercury to share with their stakeholder networks – Minutes of the meeting are published on the www.bluescopeillawarra.com.au website – No concerns were raised

Date	Stakeholder	Engagement method	Project specific outcomes and feedback
10 December 2022	All Illawarra residents	Community Information Session	<ul style="list-style-type: none"> – Provide an update on the project and discuss other Major BlueScope Projects – Four senior BlueScope personnel were on hand to answer questions about CLIP with interactive displays present, large project maps and signage as well as copies of the EIS available to take home – Twenty participants attended the session varying from employees to residents and industry group representatives – Support was noted from all participants with no concerns raised
20 December 2022	BlueScope employees (Australian Steel Products and Manufacturing employees)	<p>Employee engagement platforms including Workplace</p> <p>BlueScope Major Project updates discussed as part of a Live Chat session with Chief Executive Australian Steel Products, John Nowlan. The 'chat' was also recorded and made available to employees on the platform for later viewing</p>	<ul style="list-style-type: none"> – Updates have been shared via the Company's online engagement platform, Workplace (known as 'Facebook for workplaces') and through ongoing ASP chat sessions, held online with Chief Executive Australia Steel Products, John Nowlan – The ASP chat sessions also enables employees to submit questions during the live chat session and the session is recorded and remains accessible on Workplace for those unable to make the 'live' session – It was noted that the Project is progressing with the EIS submitted to DPE and public display period held in December 2022 – Further briefings will be held during each stage of the NSW Government Planning Process



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