



4 October 2013  
Manager – Industry Mining & Industry Projects  
Department of Planning  
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Attention: Mr. C. Ritchie

Dear Chris,

**BLUESCOPE STEEL (AIS) PTY LTD – SINTER PLANT WASTE GAS CLEANING PLANT  
(S00\_01294), SRG GYPSUM (MOD-50-4-2005-I), SINTER PLANT UPGRADE (MP06\_0229).**

We would like to thank you and your personnel for taking the time to discuss the potential to consolidate Environmental Reporting and Independent Environmental Auditing requirements for these approvals. This submission is in response to the discussions held in the meetings held with yourself, Miss Kerry Hamann, Mr. Pascal VandaWelle and BlueScope Steel Environment Department officers on the 7th November 2012 and 11th February 2013.

The Environmental Management and Independent Auditing reporting requirements for these development consents that were the subject of discussion are as follows:

Sinter Plant Waste Gas Cleaning Plant - (DA No 26 – 02 01)

Condition 7.4 of Development Approval (DA No 26 – 02 01) provides that *"the Applicant must submit an Annual Environmental Management Report to the Director General, EPA and the Council. This report must:*

- (a) identify all the standards, performance measures, and statutory requirements the development is required to comply with;*
- (b) review the environmental performance of the development to determine whether it is complying with these standards, performance measures, and statutory requirements;*
- (c) identify all the occasions during the previous year when these standards, performance measures, and statutory requirements have not been complied with;*
- (d) include a summary of any complaints made about the development and indicate what actions were taken (or are being taken) to address these complaints;*
- (e) include the detailed reporting from the Environmental Monitoring Program, and identify any trends in the monitoring over the life of the project; and*
- (f) where non-compliance is occurring, describe what actions are or will be taken to ensure compliance, as well as who will be responsible for carrying out these actions, and when these actions will be implemented."*

Condition 7.6 of Development Approval (DA No 26 – 02 01) requires that *"Within 12 months of commissioning the Waste Gas Cleaning Plant and every three years thereafter unless the Director*

*General directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit:*

*The Independent Environmental Audit must:*

- (a) be conducted by a suitably qualified, experienced, and independent person whose appointment has been endorsed by the Director – General;*
- (b) be consistent with ISO 14010 – Guidelines and General Principles for Environmental Auditing, and ISO 14001 – Procedures for Environmental Auditing, or updated versions of these guidelines/manuals;*
- (c) assess the environmental performance of the development, and its effects on the surrounding environment;*
- (d) assess whether the development is complying with the relevant standards, performance measures, and statutory requirements;*
- (e) review the adequacy of the Applicant's Environmental management plan, and environmental monitoring Program; and , if necessary,*
- (f) recommend measures or actions to improve the environmental performance of the plant, and / or the environmental management and monitoring systems."*

*Condition 7.7 requires that "Within 2 months of commissioning the audit, the Applicant must submit a copy of the audit report to the Director General. After reviewing the report, the Director – General may require the Applicant to address certain matters identified in the report. The applicant must comply with any reasonable requirements of the Director General".*

### Sinter Plant (OPUP) Ore Preparation Upgrade Project

Condition 4.1 of the Approval requires that *"The Proponent shall develop and implement a compliance tracking program to track compliance with the requirements of this approval. The program shall include, but not necessarily be limited to:*

- a) provisions for periodic review of the compliance status of the project against the requirements of this approval;*
- b) provisions for periodic review of the compliance status to the Director General;*
- c) a program for independent environmental auditing at least annually, or as otherwise agreed by the Director General, in accordance with ISO 19011;2002 – Guidelines for Quality and / Environmental Management Systems Auditing; and*
- d) mechanisms for rectifying any non-compliance identified during environmental auditing or review of compliance".*

BlueScope has reviewed all development consent conditions currently included into current Annual Environmental Management and Independent Auditing reports associated with the abovementioned development consents.

Our review has identified that in general, most development consent conditions for these projects have been either completed, modified and or transferred into the Bluescope Steel Environmental Protection Authority (EPL) 6092 Licence and therefore suggest that these conditions have been addressed and that ongoing compliance can be demonstrated through reference to historical reports and/or completion of ongoing regulatory requirements. Comments are provided in Appendix 1 and 2 for your consideration.

Currently Environmental Independent audits are conducted for the "Sinter Plant Waste Gas Cleaning Plant" and "SRG Gypsum Plant" and on a tri-annual basis and annually for the Ore Preparation Upgrade Project. Individual Environmental Management reports for these projects are also provided to the Department on an annual basis.

In order to streamline future Independent Auditing and Environmental Management reporting requirements, BlueScope seeks approval from the Department to:

- align the Independent Environmental Auditing and Environmental Management reporting frequency for these projects to comply to a Tri-Annual frequency auditing and reporting period;
- consolidate Environmental Management reporting for the "Sinter Plant Waste Gas Cleaning Plant", "SRG Gypsum Plant" and "Ore Preparation Upgrade Project" into one combined Tri-Annual Environmental Management Report; and
- that future independent auditing and environmental management reports be forwarded to the DoP at the end of December Tri-annually) commencing 2016.

A copy of a draft Environmental Management report that BlueScope proposes to provide to the department in future is presented in Appendix 3 for the department's consideration.

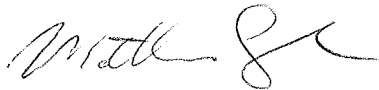
We advise that for the 2013-year reporting period Independent auditing and associated independent audit reports for the "Sinter Plant Waste Gas Cleaning Plant", "SRG Gypsum Plant" and "Ore Preparation Upgrade Project" had been forwarded to the department in June 2013. The annual Environmental management report for the "Sinter Plant Waste Gas Cleaning Plant" and "SRG Gypsum Plant" is attached.

BlueScope is aware of the Department of Planning's proposed reform of the NSW Environmental Planning Legislative framework to transform the current planning legislative system to a simpler and more flexible performance based system, benefiting members from both Business and Community sectors.

BlueScope supports the Department of Planning reform approach. To this end, BlueScope Steel recognises that consolidating future Independent Auditing and Environmental Management development approval reporting requirements for Sinter Plant related development consents is consistent with the Departments' strategic approach to the reform of the planning legislative framework.

We thank you for your consideration in this matter. Please contact Mr. Lawrence Zammit on (02) 4275 7522 Ext. 5998 should you have any questions or request to arrange follow up meetings to discuss this matter further.

Yours faithfully



**MATTHEW IMBER**  
**BlueScope**  
**Environment Manager Manufacturing**