



PUBLIC DISCLOSURE STATEMENT

**BLUESCOPE STEEL LIMITED
PRODUCT CERTIFICATION
XLERPLATE® STEEL
FY2024–25 (ARREARS)**

Australian Government

Climate Active Public Disclosure Statement



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	BlueScope Steel Limited
REPORTING PERIOD	Financial year: 1 July 2024 – 30 June 2025 Arrears
DECLARATION	<i>To the best of my knowledge, the information provided in this public disclosure statement is true and correct and meets the requirements of the Climate Active Carbon Neutral Standard.</i>  Philippa Stone Sustainability Manager, Australian Steel Markets 28 May 2026



Australian Government

Department of Climate Change, Energy,
the Environment and Water

Public Disclosure Statement documents are prepared by the submitting organisation. The material in Public Disclosure Statement documents represents the views of the organisation and do not necessarily reflect the views of the Commonwealth. The Commonwealth does not guarantee the accuracy of the contents of the Public Disclosure Statement documents and disclaims liability for any loss arising from the use of the document for any purpose.

Version 10.

1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	0 tCO2-e (no opt-in during the year)
CARBON OFFSETS USED	N/A (no opt-in during the year)
RENEWABLE ELECTRICITY	N/A
CARBON ACCOUNT	Prepared by: BlueScope
TECHNICAL ASSESSMENT	Date: 9 February 2024 Name: Rob Rouwette Organisation: Start2see Pty Ltd Next technical assessment due: October 2026
THIRD PARTY VALIDATION	Not required – EPD Pathway used

Contents

1. Certification summary.....	3
2. Certification information.....	4
3. Emissions boundary.....	7
4. Emissions reductions	11
5. Emissions summary	15
6. Carbon offsets.....	17
7. Renewable Energy Certificate (REC) summary	19
Appendix A: Additional information	20
Appendix B: Electricity summary.....	21
Appendix C: Inside emissions boundary	22
Appendix D: Outside emission boundary	24
Appendix E: Opt-in product action plan.....	28

2.CERTIFICATION INFORMATION

Description of product certification

This opt-in carbon neutral certification is for XLERPLATE® steel, manufactured by BlueScope in Australia, which have been grouped based on their carbon and alloy content. The different steel grade groups covered are Low carbon steel¹, Medium carbon steel, and Alloyed steel with thickness between 5mm and 150mm (depending on product).

The XLERPLATE® steel carbon neutral certification:

- Is an opt-in programme. Carbon neutral products are available to BlueScope customers on an opt-in basis. The total carbon inventory to be offset will be assessed annually based on the quantity of carbon neutral certified product sold in the Financial Year.
- The functional unit is 1 kilogram of XLERPLATE® steel.
- The scope of the certification is cradle-to-grave. It includes emissions from cradle-to-gate (modules A1-A3), plus rollforming and end-of-life (modules C1-C4). Modules A4-A5 (construction process) and B1-B7 (use) have not been included due to the inability to predict how the material will be used following manufacture. See Figure 1.

The carbon account is based on the Environmental Product Declaration (EPD) for XLERPLATE® steel v2.0 (published 27 November 2020). BlueScope's EPDs are expressions of our strong commitment to environmental transparency and reflect our focus on product stewardship and broader commitment to sustainability.

The XLERPLATE® steel EPD is published under the EPD Australasia Programme and is in accordance with ISO 14025 and EN 15804+A2. The EPD is available on the [EPD Australasia](#) website or [steel.com.au](#).

The EPD covers cradle-to-grave life cycle stages, including cradle-to-gate (modules A1-A3), plus rollforming and end-of-life (modules C1-C4). Modules A4-A5 (construction process) and B1-B7 (use) have not been included due to the inability to predict how the material will be used following manufacture.

The carbon inventory for XLERPLATE® steel has been calculated based on the global warming potential (GWP-total) results of the EPD.

No product has been sold as part of the opt-in carbon neutral certification program between 1 July 2024 and 30 June 2025. This reflects the opt-in nature of the offering and the absence of customer projects electing to purchase product under the Climate Active certified option within the period (see Appendix E for more information).

¹ The terms 'low carbon steel' and 'medium carbon steel' refer to the carbon content in the metal alloy and not to the carbon dioxide (CO₂) emissions associated with the product.

Description of business

BlueScope is a global leader in metal coating and painting products for the building and construction industries, providing vital components for houses, buildings, structures, vehicles and more.

We have built a solid foundation for growth with a diverse portfolio of businesses in some of the largest and fastest growing economies of the world. We are headquartered in Australia, with our people and operations spread across North America, Australia, New Zealand, Pacific Islands and throughout Asia.

Australian Steel Products employs around 7,000 employees at approximately 100 sites, being a mix of large manufacturing plants, roll-forming facilities and distribution centres across Australia. We produce a wide range of steel products including slab, hot rolled coil and plate, cold rolled coil, zinc/aluminium alloy-coated ZINCALUME® steel, galvanised and pre-painted COLORBOND® steel.

XLERPLATE® steel is manufactured by BlueScope. In Australia, BlueScope specialises in flat steel products, including slab, hot rolled coil, cold rolled coil, plate and value-added metallic coated and painted steel solutions.

Produced to the Australian Standards AS/NZS 3678:2016 (certified by the Australasian Certification Authority for Reinforcing and Structural Steels (ACRS)), and AS 1548-2008, the XLERPLATE® steel hot rolled plate range provides the flexibility to select from our standard range or customised grades, width, thickness and length to suit specific design criteria.

XLERPLATE® steel products form part of the following standard classifications: ANZSIC 2711 – Iron and Steel Manufacturing and UN CPC 41211 – Flat-rolled products of non alloy steel, not further worked than hot rolled, of a width of 600mm or more.

XLERPLATE® steel is manufactured by BlueScope in Australia, at facilities which are certified to ISO 14001. The steel in XLERPLATE® steel is manufactured at the Port Kembla Steelworks, a ResponsibleSteel™ certified site.

Life Cycle Assessment (LCA) Information

XLERPLATE® steel Manufacturing and Processing in Australia

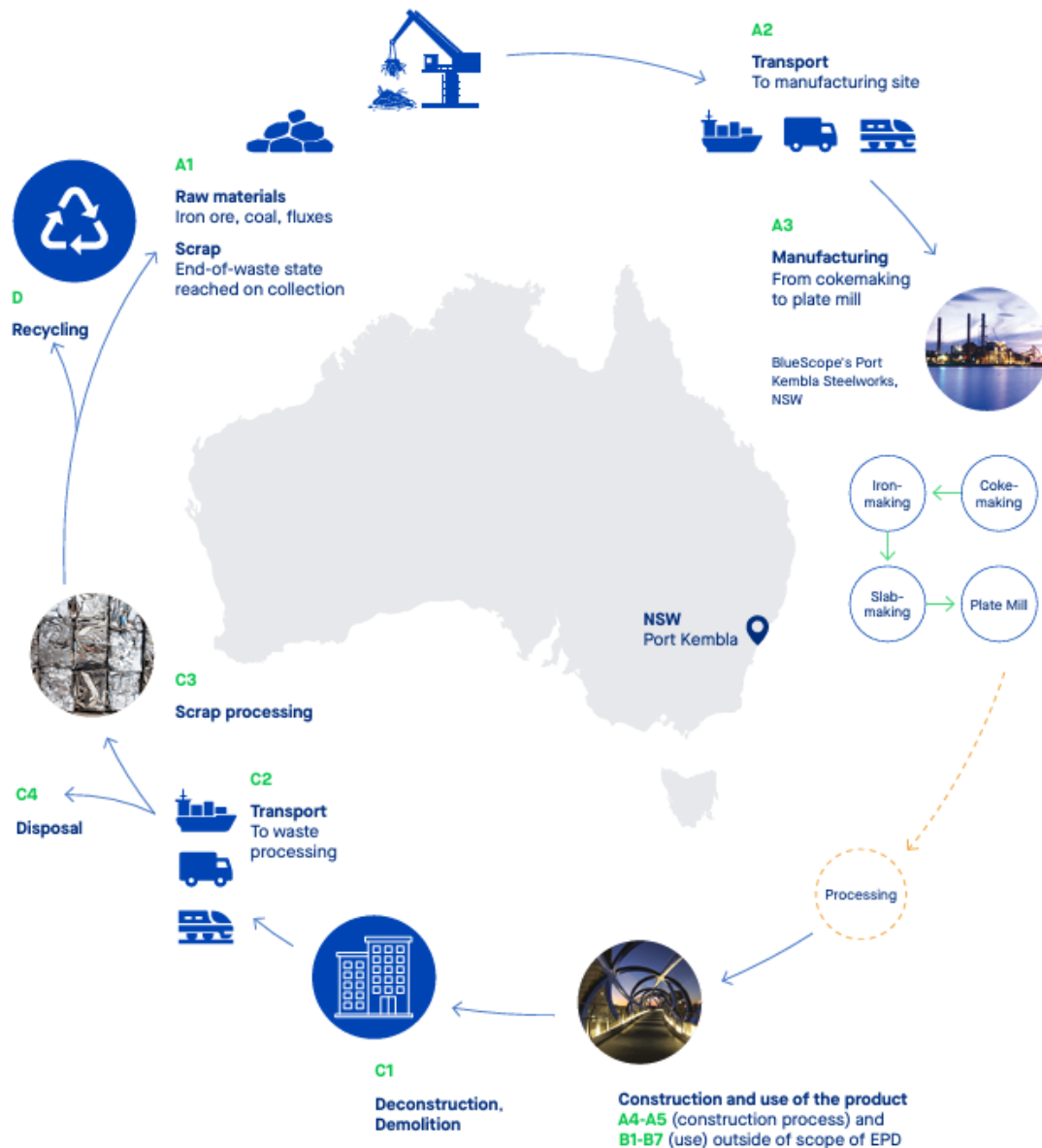


Figure 1 – XLERPLATE® steel manufacturing process and life cycle stages

3.EMISSIONS BOUNDARY

Inside the emissions boundary

All emission sources listed in the emissions boundary are part of the carbon neutral claim.

Quantified emissions have been assessed as 'attributable processes' of a product or service. These attributable processes are services, materials and energy flows that become the product or service, make the product or service and carry the product or service through its life cycle. These attributable emissions have been quantified in the carbon inventory.

Non-quantified emissions have been assessed as attributable and are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. All material emissions are accounted for through an uplift factor. Further detail is available at Appendix C.

Attributable emissions sources can be **excluded** from the carbon inventory but still considered as part of the emissions boundary if they meet **all three of the below criteria**. An uplift factor may not necessarily be applied.

1. A data gap exists because primary or secondary data cannot be collected (**no actual data**).
2. Extrapolated and proxy data cannot be determined to fill the data gap (**no projected data**).
3. An estimation determines the emissions from the process to be **immaterial**.

Outside the emissions boundary

Non-attributable emissions have been assessed as not attributable to a product or service. They can be listed as outside of the emissions boundary (and are therefore not part of the carbon neutral claim). Further detail is available at Appendix D.

Inside emissions boundary

Quantified

Raw materials: iron ore, coking coal, scrap, metal coating/alloys, paint, packaging materials, etc.

Manufacturing operations (incl. downstream rollforming): electricity, fuels, lubricating oils and greases, water, wastewater treatment, waste disposal, air emissions, etc.

Transport: raw materials to BlueScope facilities, between BlueScope facilities and from BlueScope to distributors.

End-of-life: demolition and disposal of product waste from installation and at the end of its useful life.

Non-quantified

N/A

Excluded

N/A

Outside emission boundary

Non-attributable

Personnel

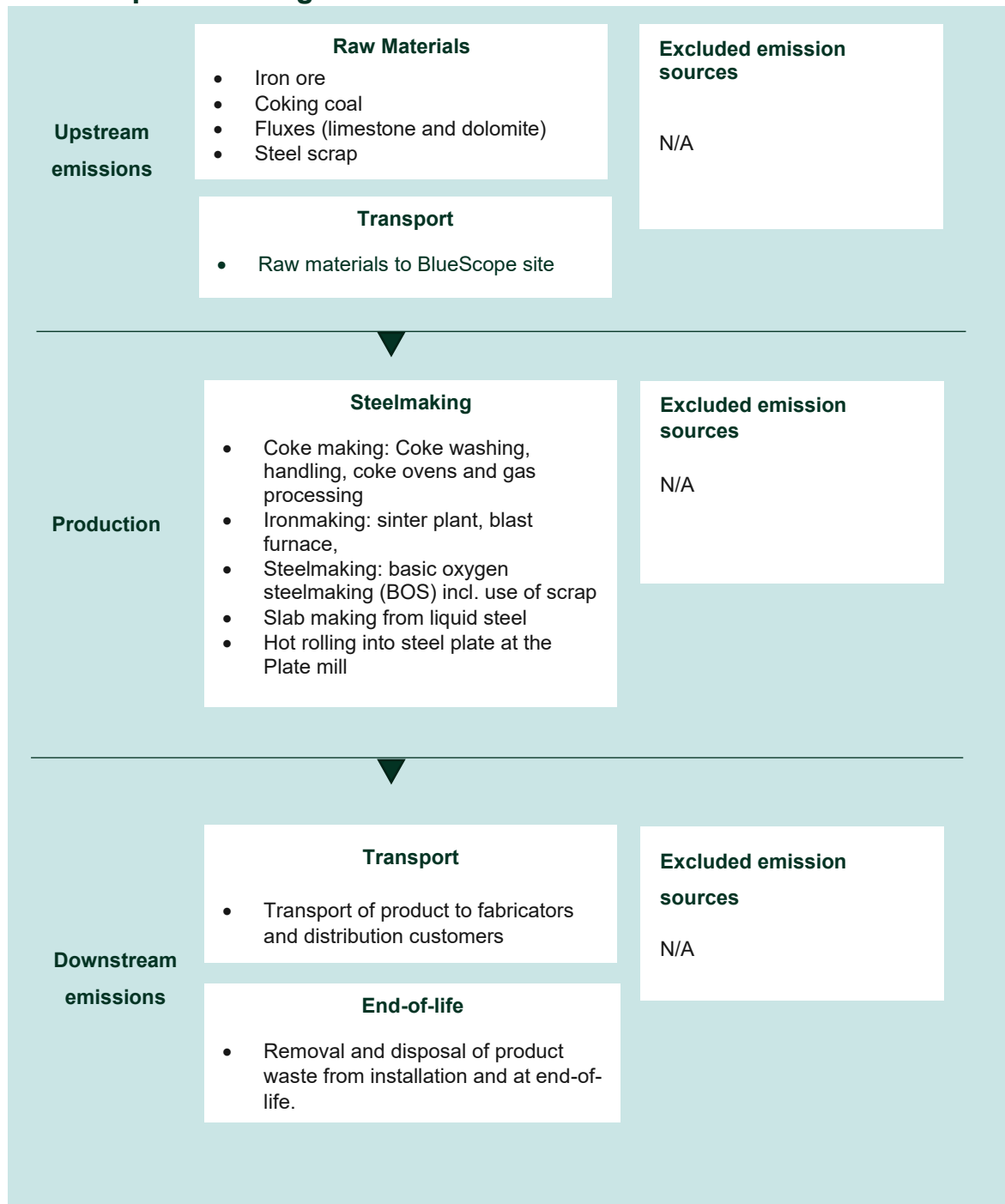
Capital Goods

Packaging materials for minor inputs, such as lubricants, greases, etc.

Construction process

Product use

Product process diagram



Manufacturing Process

The steel in XLERPLATE® steel is made from raw and recycled materials using an ‘integrated steelmaking’ method. This involves the use of iron ore, coal, steel scrap, fluxes (limestone and dolomite) and alloying materials to produce steel slab via the major processes of sintering, cokemaking, Blast Furnace/Basic Oxygen Furnace (BF-BOF) steelmaking and continuous slab casting, prior to hot rolling into the final XLERPLATE® steel plate product.

XLERPLATE® steel is manufactured at Port Kembla, NSW. The manufacturing facilities are accredited to both ISO 9001 (Quality Systems) and ISO 14001 (Environmental Management Systems). See *Figure 1 - XLERPLATE® steel manufacturing process and life cycle stages*.

Downstream processing

XLERPLATE® steel is supplied by BlueScope to downstream processors. Categorised into structural, boiler and pressure vessels and analysis products, XLERPLATE® steel is typically used to manufacture structural sections for buildings, bridges and stadiums and for other heavy industrial applications such as wind towers, pipelines and storage tanks. The finished products are delivered to construction sites for installation.

End of life

The emissions boundary for XLERPLATE® steel includes the end-of-life stages i.e., de-construction, demolition, transport, waste processing, and disposal.

4.EMISSIONS REDUCTIONS

Emissions reduction strategy

BlueScope understands the critical importance of taking action on climate change to our business and our stakeholders. It is crucial to our long-term success, and we have set medium-term targets and a long-term goal to reduce GHG emissions intensity and absolute emissions, respectively, across our global operations.

OUR 2030 TARGETS

In working towards our 2050 net zero goal, we have adopted interim emissions intensity reduction targets for steelmaking and non-steelmaking activities.

Together our 2030 targets cover around 99 per cent of BlueScope's Scope 1 and 2 GHG emissions. The baseline for the steelmaking 2030 target was FY2018.

This baseline was 9.5 per cent below industry average, as measured by worldsteel¹, and 19 per cent lower than BlueScope's FY2005 emissions intensity².

Refer to the Emissions Performance section for further information on our progress.

2030 STEELMAKING TARGET

12% Emissions intensity reduction



Steelmaking sites
(Port Kembla, Glenbrook and North Star)

2030 NON-STEELMAKING TARGET

30% Emissions intensity reduction



Midstream sites that include painting and coating lines

¹ worldsteel CO2Data Report 2023 (2022 data year)

² BlueScope utilises the GHG Protocol Equity Share approach for accounting for GHG emissions. In 2005, BlueScope had a 50 per cent equity share of the North Star steelmaking facility with Cargill. In October 2015 BlueScope acquired the remaining 50 per cent of North Star.

Our goal is to pursue net zero Scope 1 and 2 GHG emissions across our global business by 2050 and is contingent on five key enablers:

OUR 2050 NET ZERO GOAL

NET ZERO Scope 1 and 2 GHG Emissions



All global operations
(steelmaking and non-steelmaking)

Our goal is to pursue net zero Scope 1 and 2 GHG emissions across our business by 2050 and is contingent on five key enablers:



Technology evolution

Development and diffusion of ironmaking technologies to viable and commercial scale



Raw materials supply

Access to appropriate quality and sufficient quantities of economic raw materials



Firmed, affordable renewables

Access to internationally cost-competitive, firmed large-scale renewable energy



Hydrogen and natural gas availability

Availability of competitively priced green hydrogen, with natural gas enabling the transition to green hydrogen



Public policy

Supportive and consistent policies across all of these enablers to underpin decarbonisation

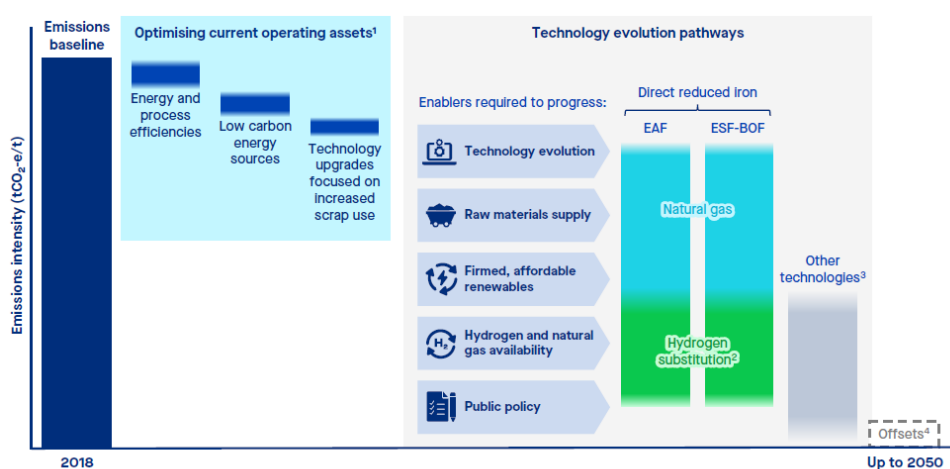
Noting the complexity and uncertainty of transitioning the hard-to-abate steelmaking industry, we will continue to assess the appropriateness of our 2050 net zero goal, including its scope and timing, against developments across these enablers.

Our priority is direct abatement through initiatives to optimise existing assets, as well as pursuing new technology pathways. While we do not intend to rely on offsets as a primary means of decarbonisation, we recognise the potential contribution of offsets to cover future liabilities beyond our ability to directly abate, residual emissions and to meet customer demand ahead of feasible decarbonisation.

BlueScope's Port Kembla Steelworks indicative steelmaking decarbonisation pathway

In Australia, BlueScope manufactures steel at our Port Kembla Steelworks in NSW. Port Kembla Steelworks is placed in the 'top 15% Blast Furnace-Basic Oxygen Furnace performers' (BF-BOF) for the emission intensity of blast furnace-based operations². Since FY2013, the site's emission intensity has declined by 16 per cent to well below the global BF-BOF average of 2.34tCO₂/tonne raw steel³. This is predominantly driven by a significant increase in scrap usage rates in the basic oxygen furnace, as well as higher operational volumes and improved process energy efficiencies.

Across BlueScope, our focus on optimising assets and reusing materials, heat and energy has led to reduced emission intensity from iron and steelmaking over the years. Currently, we have a variety of projects underway and others in the pipeline aimed at achieving further efficiency gains.



1. Optimising current assets involves working within currently available technology options to improve the efficiency of assets and processes, including upgrading technology where there are supportive enablers. This continues beyond 2030 until such time as it is feasible to convert to lower emissions DRI technology. Continuous improvement principles will apply to future production processes.
2. Contingent on commercial supply of hydrogen from renewable sources.
3. Other technologies could include electrolysis, CCS and biocarbon etc.
4. While we do not intend to rely on offsets as a primary means of decarbonisation, we retain the option to use them to meet our 2050 net zero goal where direct abatement is not technically or commercially feasible. Such decisions will be reviewed at the BlueScope Group level and are included in this site level indicative decarbonisation pathway to indicate that offsets may have a role to play.

Figure 2 – Port Kembla's indicative decarbonisation pathway (Source: BlueScope Climate Action Report 2024)

For more information visit [Climate Action | BlueScope](#).

² worldsteel CO₂ Data Report 2025 (2024 data year) has the Port Kembla Steelworks site in the lowest 15th percentile for emission intensity of BF-BOF steel plants. Note that this data is limited to those iron and steelmakers who voluntarily report on emissions data with worldsteel (52 BF-BOF sites in 2024 representing 21.9 per cent of global BOF steel production and 47 per cent of global BOF steel production excluding China. No Chinese steel plants report CO₂ data to worldsteel).

³ Based on steelmakers who reported to worldsteel in 2025 (with 2024 data) where co-product production is applied to the BF-BOF routes considered.

Emissions reduction actions

The following emission reduction activities are specific to BlueScope's Australian steelmaking and non-steelmaking operations.

Energy and process efficiencies

Projects and initiatives to improve energy and process efficiencies include:

- The improved humidity injection control implemented in the blast furnace in FY2022 which has reduced coal use and associated emissions by approximately 70,000 tonnes of CO₂-e per year⁴.
- Various projects to use process gases more efficiently, such as installing a Waste Gas Heat Recovery (WGHR) system on No.6 Blast Furnace and a new more efficient plate mill furnace (expected to be operational by mid-2027) to lower indigenous process gas consumption. The process gases liberated by these initiatives will enable more onsite electricity generation and reduce external electricity consumption.
- Additional electricity generation from a larger Top Gas Recovery Turbine (TRT) to be installed on No.6 Blast Furnace, which will use pressure from top gases to generate electricity and reduce external electricity consumption.

Low carbon energy sources

- In 2023 ARENA co-funded a study into prioritising options for decarbonisation pathways at Port Kembla, highlighting biocarbon (also known as biochar) as a promising short to medium-term option in ironmaking. We successfully completed trials to test biocarbon as a partial replacement for pulverised coal injection in the blast furnace. However, there are challenges in sourcing cost-effective, sustainably produced biocarbon⁵ in the quantities needed for commercial adoption. We are working with several prospective sustainable biocarbon suppliers to explore the potential for an industrial-scale supply chain in Australia.

Increased scrap use

- Increasing the proportion of scrap used in the BOF helps reduce emission intensity. Through optimising the inherent chemical and heat energy within the BOF process, capital upgrades and operating practices have allowed significant increase in scrap additions since 2018. However, the proportion of scrap used in the BOF is also dependent on economic factors and may fluctuate from time to time.

It is important to note that many of these projects remain subject to technical and economic feasibility assessment and require supportive government policies. We will continue to work to optimise the Port Kembla operations beyond 2030 until it is commercially and technically viable to transition to lower emissions iron and steelmaking technologies.

FY25 performance

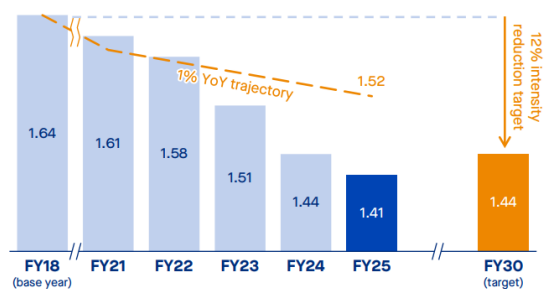
In FY2025, BlueScope achieved a 14 per cent reduction in steelmaking emissions intensity against its FY2018 baseline, above its 2030 target level. This was primarily driven by higher volumes at North Star, along with operating and process efficiencies at Glenbrook and Port Kembla Steelworks.

BlueScope's non-steelmaking emissions intensity has reduced by 12 per cent since FY2018. This has been supported by projects including the installation of a more efficient paint line oven at Western Port in Australia. Midstream emissions reduction performance was again affected in FY2025 by higher levels of value-added production (which have a higher emissions intensity) within lower overall midstream volumes.

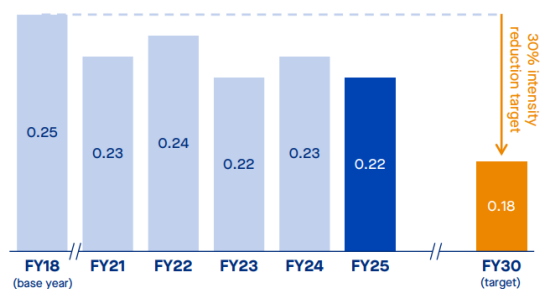
⁴ Based on BlueScope analysis which assumes an annual coke production average of 7,500 tonnes per day, equating to a saving of approximately 19,000 tonnes of coke per year.

⁵ This includes sourcing biocarbon in line with BlueScope's responsible sourcing guidelines, as well as ensuring appropriate treatment and capture of emissions from such sources.

GHG emissions intensity for steelmaking activities (Scope 1 and 2)(tCO₂-e per raw steel tonnes)



GHG emissions intensity for non-steelmaking activities (Scope 1 and 2)^{1,2}(tCO₂-e per despatched tonnes)



1. Our non-steelmaking target applies to our midstream activities that include our cold rolled, metal coating and painting lines and long products. The above graph does not include data from our hollow steel products from 2020 as production ceased in our New Zealand operation.
2. In FY2024, non-steelmaking data was updated to incorporate BlueScope Coated Products assets from FY2023. Non-steelmaking GHG emissions intensity target has not been re-baselined as the acquired facilities do not have a material impact on the GHG emissions intensity in the base year.

Figure 3 – BlueScope’s global GHG performance against 2030 targets (Source: BlueScope Sustainability Report 2025)

5.EMISSIONS SUMMARY

Emissions over time

Emissions since base year		Total tCO ₂ -e	Emissions intensity of the functional unit
Base year:	FY2018–19	N/A	
Year 1:	FY2023–24 (1 July 2023 to 30 June 2024)	0 (nil)	XLERPLATE® steel emissions intensity: • Low carbon steel – 2.63 kg CO₂-e/kg • Medium carbon steel – 2.68kg CO₂-e/kg • Alloyed steel – 2.78 kg CO₂-e/kg
Year 2:	FY2024–25 (1 July 2024 to 30 June 2025)	0 (nil)	

Use of Climate Active carbon neutral products, services, buildings or precincts

N/A

Emissions summary

Life cycle stage	tCO ₂ -e
Manufacturing (A1-A3) Includes raw materials, transport of raw materials to site and manufacturing incl. rollforming.	0 (nil)
End-of-Life (C1-C4) Includes deconstruction/demolition, transport to waste processing site, waste processing and disposal.	0 (nil)

At the end of the FY2024-25 no XLERPLATE® steel products have been sold as part of the opt-in program. This reflects the opt-in nature of the offering and the absence of customer projects electing to purchase product under the Climate Active certified option within the period (see Appendix E for more information).

Product offset liability	
Emissions intensity per functional unit	XLERPLATE® steel: • Low carbon steel – 2.63 kg CO₂-e/kg • Medium carbon steel – 2.68 kg CO₂-e/kg - Alloyed steel – 2.78 kg CO₂-e/kg
Emissions intensity per functional unit including uplift factors	N/A
Number of functional units covered by the certification	0 (nil) tonnes of XLERPLATE® steel
Total emissions (tCO₂-e) to be offset	0 (nil) tCO ₂ -e (no product sold as part of the opt-in program in FY24-25)

6. CARBON OFFSETS

Eligible offsets retirement summary

Offsets retired for Climate Active certification

Type of offset unit	Quantity used for this reporting period	Percentage of total units used
Australian Carbon Credit Units (ACCUs)	0 (nil) tCO ₂ -e	0%

Project name	Type of offset unit	Registry	Date retired	Serial number	Vintage	Total quantity retired	Quantity used in previous reporting periods	Quantity banked for future reporting periods	Quantity used for this reporting period	Percentage of total used this reporting period
Moombidary Forest Regeneration Project	ACCUs	ANREU	11 Mar 2024	<u>8,337,287,983 - 8,337,287,996</u>	2021-22	14	-	14	0 (nil)	0%

Co-benefits

BlueScope's priority is direct abatement through initiatives to optimise existing assets, as well as pursuing new technology pathways. While we do not intend to rely on offsets as a primary means of decarbonisation, we recognise the potential contribution of offsets to cover future liabilities beyond our ability to directly abate, residual emissions and to meet customer demand ahead of feasible decarbonisation. BlueScope has developed a group-wide carbon offsets strategy and internal governance framework that apply to both compliance and voluntary offsets use, and is investigating opportunities to procure carbon offsets to meet potential lower carbon product demands from customers.

Moombidary Forest Regeneration Project - Queensland, Australian Carbon Credit Unit (ACCU):

This project establishes permanent native forests through assisted regeneration from in-situ seed sources (including rootstock and lignotubers) on land that was cleared of vegetation and where regrowth was suppressed for at least 10 years prior to the project having commenced. The project is reducing the impact of agricultural practices on regenerating trees, including by investing in new infrastructure and establishing rotational grazing practices.

The Traditional Custodians have formed a unique collaboration with the property owner and Climate Friendly to partner on this native forest regeneration carbon farming project on Moombidary Station.

The carbon farming project has helped the Traditional Owners to regain access and connection to their traditional country, providing options to return to cultural management practices. As a result of this project an area will be set aside for the Traditional Owners to set up and maintain a bush tucker garden.

The surveying and mapping of cultural sites is also facilitated by the project. The location of such sites will be recorded in order to protect them and help manage Traditional Owner knowledge.

The project also offers some local employment opportunities, as representatives from the Budjiti and Kullilli Bulloo River Aboriginal Corporations are hired and trained to assist in annual field work and monitoring of regenerating forest across the carbon project.

7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) Summary

N/A

APPENDIX A: ADDITIONAL INFORMATION



Australian Government

Clean Energy Regulator

Australian National Registry of Emissions Units

ANREU Home

Account Holders

Accounts

Unit Position Summary

Projects

Transaction Log

CER Notifications

Public Reports

My Profile

Transaction Details

Transaction details appear below.

Transaction ID

AU32644

Current Status

Completed (4)

Status Date

11/03/2024 10:48:31 (AEDT)

10/03/2024 23:48:31 (GMT)

Transaction Type

Cancellation (4)

Transaction Initiator

Transaction Approver

Comment

Cancelled on behalf of BlueScope to meet its carbon neutral product claim for COLORBOND® Coolmax® steel against the Climate Active Carbon Neutral Standard for FY24

Transferring Account

Account Number

AU-1242

Account Name

BLUESCOPE STEEL LIMITED

Account Holder

BLUESCOPE STEEL LIMITED

Acquiring Account

Account Number

AU-1088

Account Name

Australia Voluntary Cancellation Account

Account Holder

Commonwealth of Australia

Transaction Blocks

Party	Type	Transaction Type	Original CP	Current CP	ERF Project ID	NGER Facility ID	NGER Facility Name	Safeguard	Kyoto Project #	Vintage	Expiry Date	Serial Range	Quantity
AU	KACCU	Voluntary ACCU Cancellation			ERF101548					2021-22		8,337,287,983 - 8,337,287,996	14

Transaction Status History

Status Date	Status Code
11/03/2024 10:48:31 (AEDT)	Completed (4)
10/03/2024 23:48:31 (GMT)	
11/03/2024 10:48:31 (AEDT)	Proposed (1)
10/03/2024 23:48:31 (GMT)	
11/03/2024 10:48:31 (AEDT)	Account Holder Approved (97)
10/03/2024 23:48:31 (GMT)	
11/03/2024 09:05:21 (AEDT)	Awaiting Account Holder Approval (95)
10/03/2024 22:05:21 (GMT)	

APPENDIX B: ELECTRICITY SUMMARY

N/A

APPENDIX C: INSIDE EMISSIONS BOUNDARY

Non-quantified emission sources

The following emissions sources have been assessed as attributable, are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. These emissions are accounted for through an uplift factor. They have been non-quantified due to one of the following reasons:

1. **Immaterial** <1% for individual items and no more than 5% collectively
2. **Cost effective** Quantification is not cost effective relative to the size of the emission but uplift applied.
3. **Data unavailable** Data is unavailable but uplift applied. A data management plan must be put in place to provide data within 5 years.
4. **Maintenance** Initial emissions non-quantified but repairs and replacements quantified.

An uplift factor must be applied to account for emissions sources which are estimated to be material, but not practical to measure (such as no actual or projected data).

Relevant non-quantified emission sources	Justification reason
N/A	

Data management plan for non-quantified sources

There are no non-quantified sources in the emission boundary that require a data management plan.

Excluded emission sources

Attributable emissions sources can be excluded from the carbon inventory, but still considered as part of the emissions boundary if they meet **all three of the below criteria**. An uplift factor may not necessarily be applied.

- 1. A data gap exists because primary or secondary data cannot be collected (**no actual data**).
- 2. Extrapolated and proxy data cannot be determined to fill the data gap (**no projected data**).
- 3. An estimation determines the emissions from the process to be **immaterial (less than 1% of emissions)**.

If an emissions source is determined to be material (but does not have actual or projected data), it cannot be excluded and must be considered as a non-quantified emissions source.

Emissions Source	data	No actual	No projected data	Immaterial	Justification
N/A		N/A	N/A	N/A	

APPENDIX D: OUTSIDE EMISSION BOUNDARY

Non-attributable emissions have been assessed as not attributable to a product or service (do not carry, make or become the product/service) and are therefore not part of the carbon neutral claim. To be deemed attributable, an emission must meet two of the five relevance criteria. Emissions which only meet one condition of the relevance test can be assessed as non-attributable and therefore are outside the carbon neutral claim. Non-attributable emissions are detailed below.

1. **Size** The emissions from a particular source are likely to be large relative to other attributable emissions.
2. **Influence** The responsible entity could influence emissions reduction from a particular source.
3. **Risk** The emissions from a particular source contribute to the responsible entity's greenhouse gas risk exposure.
4. **Stakeholders** The emissions from a particular source are deemed relevant by key stakeholders.
5. **Outsourcing** The emissions are from outsourced activities that were previously undertaken by the responsible entity or from outsourced activities that are typically undertaken within the boundary for comparable products or services.

Non-attributable emissions sources summary

For this certification, construction process emissions (modules A4–A5) and product use emissions (modules B1–B7) are treated as non-attributable because they fall outside the product system boundary defined in the EPD life cycle assessment; justification is provided in Appendix D.

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Personnel	N	N	N	N	N	Size: The emissions source is not large compared to other attributable emissions. Influence: The potential influence of the emissions from this source is neglectable compared to the product. Risk: The source does not create supply chain risks, and it is unlikely to be of significant public interest. Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for the product. Outsourcing: Not Applicable
Capital Goods	N	N	N	N	N	Size: The emissions source is not large compared to other attributable emissions. Influence: Not applicable to the EPD pathway. Risk: The source is unlikely to be of significant public interest. Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for the product. Outsourcing: Not Applicable

Packaging materials for minor inputs, such as lubricants, greases, etc., which are used in very small quantities.	N	N	N	N	N	Size: The emissions source is not large compared to other attributable emissions. Influence: Not applicable to the EPD pathway. Risk: The source is unlikely to be of significant public interest. Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for the product. Outsourcing: Not Applicable
Construction process (modules A4–A5) – non-attributable (outside product boundary per EPD).	N	N	N	N	N	Size: The emissions source is not large compared to other attributable emissions. Influence: Not applicable to the EPD pathway. Risk: The source is unlikely to be of significant public interest. Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for the product. Outsourcing: Not Applicable
Product use (modules B1–B7) – non-attributable (outside product boundary per EPD).	N	N	N	N	N	Size: The emissions source is not large compared to other attributable emissions. Influence: Not applicable to the EPD pathway. Risk: The source is unlikely to be of significant public interest. Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for the product. Outsourcing: Not Applicable

APPENDIX E: OPT-IN PRODUCT ACTION PLAN

Justification for zero sales in the reporting period

During the reporting period, no XLERPLATE® steel was sold under the opt-in Climate Active carbon neutral certified offering. This is an opt-in program where customers must specifically elect to purchase product under the certified option. In the reporting period, no customer orders were placed under this opt-in pathway.

Action plan to support uptake in the next reporting period

- Sales enablement and awareness: Provide targeted internal training and guidance to sales and customer-facing teams on when and how to offer the opt-in certified product, including standard messaging and customer FAQs.
- Customer outreach: Proactively engage with customers and segments where carbon neutral procurement is most likely (e.g., Green Star projects, projects with carbon targets) to identify upcoming opportunities.
- Pipeline tracking: Track opt-in enquiries and opportunities throughout the year to better forecast potential uptake and identify barriers to conversion.
- Continuous improvement: Review feedback from customer discussions and internal stakeholders to refine the offer and supporting materials and remove practical barriers where feasible.



An Australian Government Initiative

