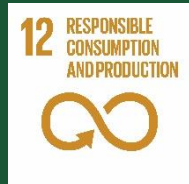


**Core Sustainable  
Development Goals**



# Steel and Steel Products

**Standard No: SSP v1.0i-2019**

Type 1 ecolabel standard in accordance with ISO 14024

Issued 26 May 2021 by GECA

(Good Environmental Choice Australia Ltd)



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# Steel and Steel Products

## DOCUMENT HISTORY

Status: **Current**

Version: **1.0i**

Date Published: **26 May 2021**

<b>Versions</b>	<b>Date Published</b>	<b>Summary of Changes</b>
1.0	27 June 2019	New standard
1.0i	26 May 2021	Update: Change of social criteria, addition of SDGs, addition of new terminologies, change of GECA address, change of text in "USE OF GECA STANDARDS", change of text in "HOW to APPLY FOR GECA CERTIFICATION", change of DOCUMENT HISTORY, change of exemption, audit, auditor and auditing body to exception, assessment, assessor and assurance provider, respectively; criteria sorted into fit for purpose – health – environmental – social criteria; updated Environmentally Hazardous Chemicals Regulation from 2008 to 2017

## HOW TO APPLY FOR GECA CERTIFICATION

Organisations interested in GECA certification using the Good Environmental Choice Australia Ecolabel are encouraged to read carefully through the entire standard. A **checklist at the back of the standard** provides a helpful list of all criteria within the standard.

Please contact us via email [enquiries@geca.org.au](mailto:enquiries@geca.org.au) or complete the [brief form located here](#) on the GECA website to begin the application process. We will then forward an **information pack** and a link to complete an **obligation-free application form**. After receiving the completed application form, an approved GECA Assurance Provider will contact the applicant and give a clear overview of the steps needed to achieve certification and provide a quote for assessment.

Note: GECA reserves the right to refuse, suspend or postpone an application if (a) the organisation does not meet minimum compliance with Environmental Law, Labour Law, Fair Pay, Work, Health and Safety, Lawful behaviour (e.g. pending or ongoing lawsuits), (b) the organisation does not have transparent reporting that is available/accessible on request or (c) the core mission of the organisation and/or product is in conflict with GECA's mission and/or is perceived by GECA to pose a risk to the GECA brand or reputation.

## DEFINITIONS & ACRONYMS

**AS, AS/NZS:** Australian standard, developed by Standards Australia or jointly by Standards Australia and Standards New Zealand.

**Assessment:** Process performed by the assessor to determine if the product conforms with the applicable GECA standard.

**Assessment report:** Full document composed by the assurance provider that states how the nominated product conforms or fails to conform to GECA standards. This report shall include appropriate and substantial evidence to justify conformance decision.

**Assessor:** The individual performing the assessment as an employee or contractor of the assurance provider.

**Assurance provider:** Person or organisation accredited by the GECA Independent Appointment Panel performing the conformance assessment.

**BF/BOF:** Blast Furnace / Basic Oxygen Furnace means a steel-making process that refines molten iron into steel by injecting hot oxygen to drive off impurities.

**C/M/R:** Substances classified as carcinogenic, mutagenic or toxic for reproduction.

**EAF:** Electric Arc Furnace means a steel-making furnace that uses a high-energy electric arc to melt ferrous scrap for refining into new steel.

**EMS:** Environmental Management System.

**Environmental Product Declaration:** Standardised way of quantifying the environmental impact of a product or system via life cycle assessment; based on and verified in accordance with ISO 14025.

**Exception:** An exception is granted when an applicant is given permission by the GECA CEO or Board to become certified despite not meeting a particular criterion in the standard as identified during the assessment process, usually with a mandatory transition period.

**Galvanised:** Galvanised steel (roll or coil) has a thin layer of zinc deposited on its surface, through a hot-dip or electrolytic process, for the purpose of increasing the steel's corrosion resistance. For the purpose of this document, "galvanising" also includes treatments with zinc-iron, zinc-aluminium or other similar zinc-based mixtures.

**Green Star:** Rating system for sustainable buildings by the Green Building Council of Australia.

**IARC:** International Agency for Research on Cancer.

**ILAC:** International Laboratory Accreditation Cooperation.

**ILO:** International Labour Organisation.

**ISO:** International Organization for Standardization.

**Halogens:** Chlorine (Cl), fluorine (F), bromine (Br), iodine (I) and astatine (At).

**Label:** Here means the Good Environmental Choice Australia Ecolabel.

**NATA:** National Association of Testing Authorities.

**NOAEL:** No observed adverse effect level.

**PCB:** Polychlorinated biphenyl.

**PLA:** Polylactic acid.

**PREP:** [Packaging Recyclability Evaluation Portal](#).

**REACH:** Registration, Evaluation, Authorisation and Restriction of Chemicals.

**ResponsibleSteel Standard:** Standard for sustainably sourced steel.

**SDGs (Sustainable Development Goals):** The [2030 Agenda for Sustainable Development](#), adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the [17 SDGs](#), which are a set of goals, targets and indicators.

**SDS:** Safety Data Sheet.

**VOC:** Volatile organic compounds.



## ABOUT GECA

At GECA, we help organisations and individuals to *make, buy and do* better for people and planet. We are a purpose-driven not-for-profit that stands for **integrity, independence** and **impact**.

We offer a suite of services designed for anyone committed to continuous improvement in their sustainability, including Australia's only not-for-profit multi-sector ecolabelling program.

GECA has proudly been a [Certified B Corp](#) since November 2015. We are part of a global movement of organisations in over 50 countries across 130 industries trying to make the world a better place.



## AN OVERVIEW OF GECA'S STANDARDS

Following ISO 14024: *Environmental labels and declarations - Type I environmental labelling - Principles and procedures* and [ISEAL frameworks](#) for global best practice in ecolabelling, we've developed our rigorous standards, which are independently assessed by GECA Approved Assurance Providers.

ISO 14024 is internationally recognised and has been adopted as a benchmark for life cycle-based ecolabels by GEN, the international federation of ecolabelling bodies. Our standards are relevant to critical Australian industries, and GECA is the only Australian [GEN member](#).

ISO 14024 requires environmental labelling specifications to include criteria that are objective, reasonable and verifiable. The purpose of voluntary environmental labels and declarations is to communicate **verifiable and accurate** information for the numerous environmental and social aspects of goods and services. As required by the [Trade Practices Act](#), the information cannot be misleading. Such transparent information encourages the demand for, and supply of, those products or services that cause less harm to people and planet, thereby stimulating the potential for market-driven continuous environmental and social improvement.

While following ISO 14024 for environmental, health and fit for purpose criteria, **GECA's standards go above and beyond**, including social impact criteria. At GECA, we know that nothing can be truly sustainable if it only looks at environmental impacts and ignores the treatment of people. GECA standards identify the **environmental, human health, fit for purpose** and **social impact** criteria that the top environmentally and socially performing products or services sold in the Australian marketplace can meet to be recognised by GECA as "environmentally and socially preferable".

All GECA standards are based on life cycle thinking, allowing organisations to understand their sustainability impacts and where they occur within their operation's life cycle, **from raw materials to end of life**. We have used these principles to set criteria to address relevant sustainability loads typical in a product category. As such, this standard may also offer guidance for organisations to reduce the harmful impacts of their products or services. Organisations may use the criteria in this standard as an optimisation tool to design and refine the processing, manufacturing, packaging and delivery of their products or services. Also, organisations may uncover other sustainability issues and potential measures within the product's or service's life cycle.

At GECA, we encourage both manufacturers and retailers to include and adapt improvements in their processes and product designs that will enable them to achieve even better sustainability results where technically possible. GECA welcomes feedback where this has occurred.

While all GECA ecolabelling standards are voluntary, nevertheless they contain criteria that address compliance with specific laws. Also, a GECA standard may recognise specific Australian standards. A prerequisite for certification under the GECA ecolabel is to satisfy the relevant Australian and international standards, where required by law. However, Australia's compulsory standards typically focus on fit for purpose criteria instead of assuring environmental and social preferability. **GECA's ecolabelling standards go beyond mandatory Australian standards** and define an environmental and social benchmark for specific product categories.

Where a product or service is certified under our standard, it may display the GECA ecolabel (the "Good Environmental Choice Australia Mark") to show that it has been independently assessed and demonstrates conformance with the environmental and social criteria detailed in this standard.

Products or services certified as conforming to our standards may gain a marketing advantage in government and business procurement programs, as well as greater market recognition in general because of their independently verified sustainability attributes. GECA certification demonstrates leadership and may help to future-proof supply chains and improve economic performance. By generating genuine benefits for people and planet, it is possible to gain increased customer loyalty.

**For further information please contact GECA**

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The GECA Certified logo consists of the circular 'GOOD ENVIRONMENTAL CHOICE AUSTRALIA' emblem, a red square with a white checkmark, and the text 'GECA CERTIFIED' below it.

**One ecolabel says it all**  
A better environmental,  
healthier and ethical choice



**ENVIRONMENT**   **HEALTH**   **SOCIAL & ETHICAL**   **FIT FOR PURPOSE**

## STRUCTURE OF THE STANDARD

Within each section of this standard, you will find criteria and Demonstrations of Conformance (DoCs). The criteria outline the requirements for the product and applicant company regarding its sustainability performance. The DoCs list the information required to verify compliance with the criteria. Selected sections also contain introductory text which outlines the purpose behind the criteria or the reason for its inclusion in the standard.

## REQUESTING ADDITIONAL EVIDENCE


DoCs are listed for each criterion within this standard; however, a GECA Approved Assessor may request additional information to ensure conformance on a case-by-case basis. Therefore, the DoCs listed below should be considered a guide to the applicant organisation's minimum DoCs.

## RELEVANCE WITH SUSTAINABLE DEVELOPMENT GOALS

Each of GECA's standards is linked to specific [Sustainable Development Goals](#) (SDGs) set by the United Nations. The 17 SDGs are an internationally agreed framework for urgent action to achieve the [2030 Agenda for Sustainable Development](#) adopted by all UN member states in 2015, including Australia. The goals address global challenges, including global inequality, climate change, environmental degradation, peace and justice. Each standard criterion answers specific SDG targets.

Each criterion within this standard answers to a specific SDG target. These specific SDGs are shown below and are highlighted throughout each section of the standard, including the core SDGs related to this standard as further illustrated.




**12** RESPONSIBLE CONSUMPTION AND PRODUCTION



If the global population reaches **9.6 billion** by 2050, the equivalent of almost **three planets** will be required to sustain current lifestyles

### SUSTAINABLE DEVELOPMENT GOALS

All SDGs relevant to GECA's Steel and Steel Products standard

<b>3</b> GOOD HEALTH AND WELL-BEING 	<b>5</b> GENDER EQUALITY 	<b>6</b> CLEAN WATER AND SANITATION 
<b>7</b> AFFORDABLE AND CLEAN ENERGY 	<b>8</b> DECENT WORK AND ECONOMIC GROWTH 	<b>9</b> INDUSTRY, INNOVATION AND INFRASTRUCTURE 
<b>10</b> REDUCED INEQUALITIES 	<b>11</b> SUSTAINABLE CITIES AND COMMUNITIES 	<b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION 
<b>13</b> CLIMATE ACTION 	<b>14</b> LIFE BELOW WATER 	<b>15</b> LIFE ON LAND 

## Core SDGs relevant to GECA's Steel and Steel Products standard

### 6 CLEAN WATER AND SANITATION



#### CORE SDG: 6 CLEAN WATER AND SANITATION

##### GECA Standard Criterion

- Water management: criteria 16-20

##### SDG 6 Specific target 6.3

By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally.

### 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



#### CORE SDG: 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

##### GECA Standard Criterion

- All criteria contribute

##### SDG 9 Specific target 9.1

Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all.

##### SDG 9 Specific target 9.4

By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities.

### 12 RESPONSIBLE CONSUMPTION AND PRODUCTION



#### CORE SDG: 12 RESPONSIBLE CONSUMPTION AND PRODUCTION

##### GECA Standard Criterion

- Material efficiency: criterion 14
- Waste management: criteria 29-33
- Recyclability: criterion 35

##### SDG 12 Specific target 12.2

By 2030, achieve the sustainable management and efficient use of natural resources.

##### SDG 12 Specific target 12.4

By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment.

##### SDG 12 Specific target 12.5

By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.

### 13 CLIMATE ACTION



#### CORE SDG: 13 CLIMATE ACTION

##### GECA Standard Criterion

- Greenhouse gas emissions: criteria 27, 28

##### SDG 13 Specific target 13.2

Integrate climate change measures into national policies, strategies and planning.

## BACKGROUND

Steel is a vital material for the built environment and vehicles, art, medicine, and information technology. The steel industry contributes \$11 billion to Australia's GDP and [employs over 100,000 people](#). The unique physical properties of this popular material allow it to be reused or recycled without loss of quality. However, like all materials, steel can pose a significant environmental, health and social burden during its manufacture, use and disposal.

For example, steel manufacturing is a significant contributor to worldwide carbon emissions. On average, for 2018, 1.85 tonnes of carbon were emitted for every tonne of steel produced. The steel industry generates between [7 and 9% of direct emissions](#) from the global use of fossil fuel.

The extraction of raw materials can also result in a wide range of environmental issues, including threatening biodiversity and ecosystems in adjacent areas, erosion in coastal and riverbanks, or pollution of waterways. Local impacts may include noise and dust pollution, and landscape damage.

Steel manufacturing processes can result in the emission of significant amounts of pollutants, including dioxins, polychlorinated biphenyls (PCBs), nitrogen oxides (NO<sub>x</sub>), sulphur oxides (SO<sub>x</sub>) and particulate matter. High levels of nitrogen dioxide, for example, are harmful to vegetation – [damaging foliage, decreasing growth or reducing crop yields](#). Nitrogen oxides and sulphur dioxide can also react with substances in the atmosphere to form acid rain. [PCBs are a group of harmful, persistent organic pollutants](#) that are toxic, persist in the environment and animals and bioaccumulate through the food chain.

Toxic heavy metals and their compounds such as mercury, arsenic, selenium, cobalt, tin and antimony are also detrimental to the health of manufacturing staff and users of the finished product. Volatile organic compounds (VOCs) are also present in the coatings of many products. They can trigger allergic reactions, headaches, eye irritation, and asthma problems.

GECA certification removes doubt and confusion and makes identifying environmentally and socially preferable products easier. Products certified under this standard can also contribute toward achieving credit points for projects being certified under the Green Building Council of Australia's Green Star Performance tool. In addition, our standard is also recognised by the ISCA IS rating scheme.

The standard sets requirements that aim to provide a benefit by:

- requiring that virgin mined and quarried raw materials must come from operations with environmental management plans
- restricting carbon emissions
- ensuring manufacturers using post-consumer scrap must implement procedures to exclude feedstocks containing undesirable materials
- requiring that off-gases must be captured to the maximum extent practicable and directed to a treatment system to control particulate matter
- limiting emissions of volatile organic compounds
- preventing the use of specific hazardous materials and toxic heavy metals such as known carcinogens and mutagens
- ensuring workers and suppliers through the supply chain can expect fair pay, equal opportunity, and a safe working environment

# FIT FOR PURPOSE CRITERIA

## 1. STANDARD CATEGORY SCOPE

### 1.1 Scope Schedule

**Criterion 1:** The product shall fall within the scope of this standard. The following steel products are covered by this standard:

Slabs, plates, hot rolled coil plates, cold rolled coil, billets, structural beams and columns, hollow pipes, rolled hollow sections, flat angles and channels, reinforcement bars, hot rolled coil round bar, steel wire, rails, galvanised steel products, coated steel products, assembled steel products.

Other environmentally innovative steel products that do not fit the above categories may be considered for certification provided the product fulfils the requirements of any relevant sections of this standard. Other categories may be added at a later date.

#### Exclusions and Notes

The category does not apply to products that incorporate non-steel elements.

#### Demonstration of Conformance

**DoC 1.1:** Detailed description of the product(s) or product range; and

**DoC 1.2:** Explanation of applicability of the product(s) to the scope of this standard.

## 2. FITNESS FOR PURPOSE

*To be certified, the product(s) shall be fit to perform its intended purpose or application. A minimum level of quality and durability is implicit before the Good Environmental Choice Australia Ecolabel can be displayed on the product. The producer/ manufacturer shall ensure that the product is fit for its intended purpose.*

### 2.1 Applicable Standards and Demonstrated Fitness

**Criterion 2:** The product shall meet or exceed the requirements of the relevant Australian Standard (or equivalent international); including but not limited to:

- AS/NZS 1594 Hot-rolled steel flat products
- AS/NZS 1595 Cold-rolled, unalloyed, steel sheet and strip
- AS/NZS 3679.1 Structural steel Hot-rolled bars and section
- AS/NZS 3678 Structural steel - Hot-rolled plates, floorplates and slabs
- AS 4100 Steel structures
- AS/NZS 4600 Cold-formed steel structures
- AS/NZS 5131 Structural steelwork – Fabrication and erection

#### Demonstration of Conformance

**DoC 2.1:** A detailed description of the product as it relates to relevant Australian (or other) Standards.

**DoC 2.2:** Independent assessment or test reports confirming conformance with the relevant Australian or international safety and/or quality standard.



## HEALTH CRITERIA



### 3. HAZARDOUS SUBSTANCES

*The criteria in this section are intended to address some of the main hazardous substances found within the product category, added to the product, or to ingredients during manufacturing. The intention is to reduce the use of hazardous materials and to prevent pollutants entering the environment.*

#### 3.1 Banned Substances

*Certain substances or compound classes have been identified as particularly harmful for human health and/or the environment.*

**Criterion 3:** In order to promote the reduction of pollutant hazards in the manufacture, use, or disposal of products the following substances (and where appropriate, their compounds) shall not be added to products or used during manufacture:

- Compounds or ingredients that are or may decompose into substances that are classified as a known or suspected endocrine disruptor, carcinogen, mutagen or teratogen, including:
  - any R45 (H350), R46 (H340), R48 (H372, H373), R49 (H350) substances,
  - IARC group 1 or 2A substances,
  - EU consolidated list of C/M/R category 1 or 2 substances.
- Substances of Very High Concern listed on the REACH Candidate list (<http://echa.europa.eu/candidate-list-table>).
- Toxic heavy metals and their compounds, or ingredients containing heavy metals and their compounds, including mercury (Hg), arsenic (As), selenium (Se), cobalt (Co), tin (Sn) and antimony (Sb) must not be deliberately added or used.

#### Exceptions

Above substances may be present as contaminants. Contaminants are defined as residues from raw material production or from a previous life cycle (in case of recycled materials) present in the finished product, in raw materials or in alternative fuels used in the kiln, but not substances that are added to a raw material or product for a purpose, irrespective of quantity. Trace levels of contaminants may not exceed publicly available safety standards.

Exceptions for a specific substance may be permitted only where the applicant can demonstrate that the substance:

- is necessary for performance or safety reasons; and
- is stored and managed in a manner that prevents environmental pollution during manufacture; and
- is chemically bound in a way that will prevent environmental pollution via leaching, upon disposal by landfill or incineration.

Chromium VI compounds may be used for passivating of zinc and zinc alloy coated steel products.

### Demonstration of Conformance

**DoC 3.1:** Ingredients list for the product and Safety Data Sheet (SDS) for each ingredient, identification of potential contamination sources. If a substance is present as contaminant, applicable safety standards and procedures that are met have to be detailed.

**DoC 3.2:** Where an exception is claimed for a substance that is added for a purpose, a signed declaration from an Executive Director of the applicant company stating the purpose for which the given substance is necessary; documentation clearly outlining how each chemical is used, managed and stored; and evidence that human exposure or environmental contamination is prevented.

## 3.2 Hazardous Materials

**Criterion 4:** Licence holders must report on hazardous heavy metals in the steel product, including:

- Results of analysis of hazardous heavy metals (lead (Pb), cadmium (Cd), chromium (Cr) and nickel concentrations in the steel;
- Initiatives taken to minimise levels of hazardous heavy metals in the steel; and
- Initiatives taken to minimise levels of leaching of hazardous heavy metals into the environment.

### Demonstration of Conformance

**DoC 4.1:** A description of the policies, procedures and programmes in place to minimise undesirable heavy metals in the feedstock and finished product;

**DoC 4.2:** Testing results of heavy metal concentrations in steel undertaken in accordance with the relevant ISO or ASTM test methods.

**Criterion 5:** The steel products shall not be treated with:

- Halogenated organic compounds;
- Slushing oil;
- Any of the substances listed in criterion 3.

### Exceptions

Small parts such as screws, hinges, bolts etc. are excepted from the requirements of this criterion unless they are parts that are intended to come into frequent contact with skin.

### Demonstration of Conformance

**DoC 5.1:** Signed declaration of conformance supported by documentation identifying hazardous substances used in the treatment; and

**DoC 5.2:** Description of the policies, procedures and programmes in place to ensure that the hazardous substances are not used in treatment of the product.

**Criterion 6:** Hydrofluoric acid shall not be used for pickling of steel before galvanising and coating.

#### **Exceptions**

For high-alloy stainless steel types a mixture of nitric acid and hydrofluoric acid solution (with hydrofluoric acid between 1 - 5 %) is acceptable.

Other exceptions for a specific substance may only be granted for safety or performance considerations.

In all cases it needs to be proven that

- the substance does not pose a health risk to the end user, or manufacturing/installation staff; and
- the applicant can demonstrate that exposure to the substance is below No Observable Adverse Effect Level or zero if NOAEL is unknown;
- the substance cannot enter the environment during the manufacturing/installation process or as a result of use.

#### **Demonstration of Conformance**

**DoC 6.1:** Documentation showing absence of HF including the list for all acids and other substances used for steel pickling including SDS of each chemical.

**DoC 6.2:** If an exception is claimed, a standard operating procedure (SOP) for the process in which HF is used outlining all key steps including storage and handling requirements shall be available as guidance for all users.

**Criterion 7:** Chromium VI compounds shall not be used for passivation purposes during steel production.

#### **Exceptions**

Chromium VI compounds may be used for passivating of zinc and zinc alloy coated steel products.

#### **Demonstration of Conformance**

**DoC 7.1:** If chromium VI is used, documentation outlining that there is no alternative and that it is reduced to chromium III before disposal or storage.

### **3.3 Coating**

**Criterion 8:** Top-coats and paints used for coating of steel products must meet all the requirements to be classified as non-hazardous and/or be currently licensed under a current GECA certification.

#### **Demonstration of Conformance**

**DoC 8.1:** Product SDS showing all hazard identifications including dangerous goods classifications and relevant supporting documentation.

**Criterion 9:** Paint used to coat the steel products shall not be formulated with chromium VI, mercury, lead, cadmium, arsenic or their compounds.

**Demonstration of Conformance**

**DoC 9.1:** Documentation indicating the full ingredients and formulation of paints and coatings showing it is not formulated with any of the above heavy metals.

**Criterion 10:** The total content of volatile organic compounds (VOCs) in the coatings and paints of steel products must not exceed the values stated below:

Coating type	Limit (g/l)
Coatings for architectural purposes	50
Solvent-based coatings except for architectural purposes	450
Water-based coatings except for architectural purposes	50

**Demonstration of Conformance**

**DoC 10.1:** The documentation including reports from the paint manufacturer indicating the paint formulation and ingredients used, and report of the measurements or calculations of VOC levels (g/litre).

**3.4 Storage of Raw Materials and Waste**

**Criterion 11:** The steel manufacturer must have and implement effective management policies, procedures and systems covering the appropriate storage and handling of raw materials, including steel scrap, solid wastes and environmentally hazardous materials. These procedures shall:

- Ensure any storage of steel scrap and other environmentally hazardous materials is located and managed to prevent contamination of surface water or land;
- Ensure potentially hazardous liquids are banded
- Include a Spill Response Plan detailing procedures to identify, contain and clean-up any spill of potentially hazardous substances;
- Ensure the spent acid solution (if not recovered) and associated rinse water used for pickling and fluxing in galvanising process is being neutralised to a neutral pH (or pH around 6-9) before disposal or storage);
- Ensure the chromium VI produced and present in pickling liquor is being reduced to chromium III; and
- Ensure the dissolved iron salts are being removed from the spent acid and re-used.

### **Demonstration of Conformance**

**DoC 11.1:** Documentation including photos of storage of steel scrap and hazardous materials/liquids;

**DoC 11.2:** Copy of Spill Response Plan;

**DoC 11.3:** Documentation outlining the procedure in which acids are neutralised and stored, and Cr(VI) is reduced to Cr(III), including a copy of results showing achieving such results.

# ENVIRONMENTAL CRITERIA



## 4. MATERIAL REQUIREMENTS

*The criteria in this section are intended to address some of the major life-cycle factors of a product that can be anticipated in sustainable design and are more easily incorporated during the design phase of product development.*

### 4.1 Raw Materials

*Most virgin raw materials (e.g. iron) needed for the production of steel require some form of mining or quarrying. These activities can be linked to an extended land-use and exploitation of natural resources (excavations, quarrying and ground water) which can create environmental and social issues. This can include threatening of biodiversity and ecosystems in adjacent areas, erosion in coastal and river banks, or pollution of waterways through increased turbidity and suspended solids. Local impacts may also include noise and dust pollution, and landscape damage which may be considered significant by the local community.*

**Criterion 12:** Virgin mined/quarried raw materials shall come from mining/quarrying operations:

- Which have and implement a management plan to minimise adverse effects from noise, vibration, dust, and discharges to water and land;
- With a documented rehabilitation program. This shall include a plan to minimise adverse effects on biodiversity with a preference on avoidance and minimisation of adverse effects, then restoration of habitats, then offsets with at least equivalent measures;
- With an implemented EMS in accordance with ISO 14001:2015
- With community engagement or cultural heritage plans.

Due to complex supply chains, it might be difficult to trace the whole supply chain of a specific steel product back to all raw material origins (e.g. quarries). In this case, the applicant shall prove that either on a site level or the company level, all used mining/quarrying sites fulfil above criteria.

#### Demonstration of Conformance

**DoC 12.1:** Information about the virgin material procurement program and records of the supplier, nature and geographical source of all virgin mined material inputs; and

**DoC 12.2:** Certificates or other evidence of implemented EMS; documented mine rehabilitation program, and community engagement or cultural heritage plans.

## 4.2 Use of Recycled Materials

*Steel production is well known for its high recycling rate. As this is also driven by economic factors, GECA estimates that the recycling rates will stay high in the near future. Therefore, no criterion specific to minimum recycled content is introduced for the time being. This may be reconsidered at any time if the average recycling rate in steel production drops or otherwise deemed necessary.*

**Criterion 13:** Manufacturers using post-consumer scrap must implement procedures to exclude feedstocks containing undesirable materials, including:

- Radioactive materials
- Polychlorinated Biphenyls (PCBs)

### Demonstration of Conformance

**DoC 13.1:** Signed declaration of compliance, supported by documentation on procedures and standards for excluding feedstock containing undesirable components.

## 4.3 Material Efficiency

**Criterion 14:** Licence holders shall calculate and report the overall material efficiency of the steel making site.

### Demonstration of Conformance

**DoC 14.1:** Signed declaration demonstrating the overall material efficiency of the steel making site by calculations. The calculation shall be undertaken as follows:

### Notes

- Material efficiency = (crude steel + by-products) / (crude steel + by-products + waste), where waste = material sent to landfill + material sent to incineration.
- Waste includes those materials that ultimately end up in a landfill (onsite or offsite) or are incinerated (with or without heat recovery). This does NOT include utilities waste (e.g. fly ash).
- Slags are only considered waste if they are landfilled or incinerated. Stored slags for future processing or use or slags used for landscaping purposes are not considered waste.
- By-products are residues that are used; residues not used are considered waste (all flows landfilled or incinerated). Scrap steel should NOT be included as a by-product.

## 5. ENVIRONMENTAL MANAGEMENT SYSTEM

*An Environmental Management System (EMS) integrates procedures and processes for training of personnel, monitoring and reporting of environmental performance information to stakeholders of an organisation. The EMS aims to identify and address significant environmental impacts of the manufacturing operations.*

**Criterion 15:** The applicant and manufacturer shall have an Environmental Management System in place that is in accordance with ISO 14001-2015. The environmental aspects including but not limited to the following should be among the ones addressed by the EMS:

- Emissions to air
- Releases to water and land
- Waste management (waste and by-products)
- Water management
- Storage and handling of hazardous raw materials and dangerous goods
- Noise management

### **Demonstration of Conformance**

**DoC 15.1:** Documentation showing an Environmental Management System (in accordance with ISO 14001:2015) is in place which addresses the above-mentioned environmental aspects supported by relevant documentation such as ISO14001 certificate, Aspects and Impacts Register, recent certification assessment report and any other information as per the discretion of the assessor.



## 6. PROCESS EMISSIONS AND RESOURCE MANAGEMENT

*Steel manufacturing processes use energy and water, generate waste, and can cause emissions of significant amounts of CO<sub>2</sub> and a range of pollutants. The main environmental impacts of steel manufacturing can occur on a global, regional or local scale. Global impacts include the use of energy and the release of CO<sub>2</sub>. Regional and local impacts include the emission of pollutants such as NO<sub>x</sub>, SO<sub>x</sub> and particulate matter.*

### 6.1 Water Management

**Criterion 16:** The steel mill, rolling mills and finishing lines must have effective procedures and systems (including an annual improvement plan) in place to minimise emissions of oil and grease, suspended solids and metals in waste water (including cooling water and stormwater if these contaminants may be present) discharged to the natural environment (natural water bodies, ocean or land).

#### Demonstration of Conformance

**DoC 16.1:** Description including photos of procedures and systems to minimise above emissions

**DoC 16.2:** Annual improvement plan to minimise above emissions

**Criterion 17:** The steel product manufacturer must have and implement systems to recover process wastewater sludges and sediments. The steel product manufacturer must report on how it re-uses process waste sludge and sediment or demonstrate that they are disposed to an appropriate location.

#### Demonstration of Conformance

**DoC 17.1:** Description including photos of implemented and planned systems to recover process wastewater sludges and sediments

**Criterion 18:** Discharges of contaminants to the natural environment (natural water bodies, ocean or land) from the manufacturing site including the iron and steel mill, rolling mills, finishing lines, byproduct processing areas and waste disposal areas shall be demonstrated to result in acceptable and environmentally sustainable level of impact on the quality of the receiving environment.

#### Demonstration of Conformance

**DoC 18.1:** Document outlining the compliance with all relevant environmental regulations.

**Criterion 19:** The steel product manufacturer shall have systems in place to recycle and re-use water (including stormwater) and shall implement initiatives to maximise the amount of water recycled including:

- Re-use of scrubbing water from wet-dedusting;
- Re-use of treated process water;
- Re-circulation of cooling water and water from vacuum generation.

#### **Demonstration of Conformance**

**DoC 19.1:** Description including photos of implemented systems to recycle and re-use water;

**DoC 19.2:** Calculation of rate of recycled water.

**Criterion 20:** The EAF must use a closed loop cooling water system;

#### **Demonstration of Conformance**

**DoC 20.1:** Plan/description including photos of the cooling water system

### **6.2 Emissions to Air**

**Criterion 21:** Primary off-gases from steelmaking (both EAF and BF/BOF) and secondary off-gases (from scrap charging, steel tapping and secondary metallurgy) must be captured to the maximum extent practicable. The captured off-gases must be directed to an off-gas treatment system to control particulate matter.

#### **Demonstration of Conformance**

**DoC 21.1:** Description including photos of implemented systems for off-gas capture

**Criterion 22:** Emissions of dioxins and PCBs from steelmaking via the EAF process must be measured at least annually and reported.

#### **Demonstration of Conformance**

**DoC 22.1:** Annual dioxin and PCB emissions reporting

**Criterion 23:** NO<sub>x</sub> and SO<sub>x</sub> emissions in the production of the steel must be measured and reported at least annually.

#### **Demonstration of Conformance**

**DoC 23.1:** Annual NO<sub>x</sub> and SO<sub>x</sub> emissions reporting

**Criterion 24:** Discharges to air from the steelmaking and ancillary processes shall be demonstrated to result in an acceptable and environmentally sustainable level of impact on the quality of the receiving environment.

#### **Demonstration of Conformance**

**DoC 24.1:** Document outlining the compliance with all relevant environmental regulations.

### 6.3 Dust Management

**Criterion 25:** The steel manufacturer must have and implement a dust management plan covering all areas of the mill operation including outside stockpiles and non-point source process emissions.

#### Demonstration of Conformance

**DoC 25.1:** Documentation including photos showing a management system which addresses the above mentioned aspects.

**Criterion 26:** For galvanising processes, facilities such as a hood shall be provided over the galvanising bath capturing ash, particulate matter, zinc iron alloy dross and metal oxides ash e.g. zinc oxide.

#### Demonstration of Conformance

**DoC 26.1:** Documentation including photos showing such facilities are in place and record of exposure limit of particles or ash if applicable.

### 6.4 Greenhouse Gas Emissions

**Criterion 27:** The steel maker supplying the steel must be a member of the World Steel Association's Climate Action Programme.

#### Demonstration of Conformance

**DoC 27.1:** A current Climate Action Programme certificate from the World Steel Association, confirming that the steel maker is a member of the program, must be provided.

**Criterion 28:** The carbon emissions are below 1.6 t CO<sub>2</sub> / t produced steel (i.e. at least 10% below the 2017 world average of 1.8 CO<sub>2</sub> / t produced steel). Basis is the calculation method of the World Steel Association Climate Action Programme.

OR

The annual reduction of carbon emissions is at least 0.04 t CO<sub>2</sub> / t produced steel. Basis is either the calculation method of the World Steel Association Climate Action Programme for a production site-wide calculation; or an Environmental Product Declaration for a product-specific calculation. The reductions may be averaged over a five-year period.

OR

The steel is either sourced from sites certified under the current version of the ResponsibleSteel standard or the steel itself is certified under this standard or all Climate Change and Greenhouse Gas Emissions criteria of the ResponsibleSteel standard are fulfilled.

OR

The steel product fulfils the requirements from Green Star Design and As Built version 1.2, credit 20.1B 'Energy-Reducing Processes in Steel Reinforcement Production'. This includes a life cycle assessment.

### **Demonstration of Conformance**

**DoC 28.1:** Result of most recent calculations submitted to World Steel Association's Climate Action Programme; not older than two years; OR

**DoC 28.2:** Calculations showing annual reductions for a twelve-month or up to five-year average, where the newest data must not be older than two years; for a recertification, at least the last three years must be covered; OR

**DoC 28.3:** Outline of planned carbon emissions reductions within the next three years; OR

**DoC 28.4:** Evidence of ResponsibleSteel standard certification; if the certification is for the production site(s), evidence of sources of steel needs to be included; or – if no certification under the ResponsibleSteel standard – evidence of compliance with all Climate Change and Greenhouse Gas Emissions criteria of the ResponsibleSteel standard; OR

**DoC 28.5:** Evidence of compliance with Green Star Design and As Built version 1.2, credit 20.1B 'Energy-Reducing Processes in Steel Reinforcement Production'.

## **6.5 Waste Management**

**Criterion 29:** The steel product manufacturer must have and implement systems to maximise the recovery of dedusting dusts and sludges.

### **Demonstration of Conformance**

**DoC 29.1:** Documentation including photos of implemented and planned systems of dedusting dusts and sludge recovery.

**Criterion 30:** Uprisings (excluding slags and dusts covered by Criterion 29 above), pre-consumer steel scrap and millscale shall be recycled.

### **Demonstration of Conformance**

**DoC 30.1:** Documentation of recycling systems including recycling rates

**Criterion 31:** The steel product manufacturer must have and implement effective waste management policies and procedures and/or a waste management programme (including improvement plans) covering manufacturing operations.

### **Demonstration of Conformance**

**DoC 31.1:** Copy of waste management policies and procedures and/or waste management programme and improvement plan.

**Criterion 32:** Licence holders must report on waste management, including:

- Quantities and types of waste recovered for reuse internally and externally;
- Quantities and types of waste recycled internally and externally;
- Quantities and types of waste disposed of to landfill;

- Quantities and types of waste burned internally for energy recovery;
- Waste generation related to production;
- Initiatives taken to reduce waste generation and improve recovery/recycling of waste;
- All ferrous wastes must be diverted from the waste stream and recycled;
- Quantities of slag generated and recycled;
- Initiatives undertaken at other steel plants to re-use or recycled steelmaking slags; and
- Quantities of pre-consumer steel scrap, uprisings and millscale and volumes recycled on-site, or exported for recycling.

#### **Demonstration of Conformance**

**DoC 32.1:** Documentation of above items

**Criterion 33:** For galvanising and coating processes, spent acid solution, for instance hydrochloric acid and sulfuric acid shall be recovered and reused.

#### **Demonstration of Conformance**

**DoC 33.1:** Documentation outlining the process in which each chemical is reused or recovered. The documentation should fully explain the recovery/ reuse process and the amount of chemical (acid) recovered/reused.

## 7. PACKAGING, END OF LIFE AND PRODUCT STEWARDSHIP

*Previous sections of this standard apply to the characteristics of the product and the production process. This section addresses the impacts arising during the remainder of the product's life cycle.*

### 7.1 Packaging

**Criterion 34:** Packaging shall comply with at least one of the following:

- Each material constituting >20% by weight of the total primary and secondary packaging used, must contain at least 50% recycled content by weight;
- Each material constituting >20% by weight of the total primary and secondary packaging used, must be derived from plant-based materials (e.g. PLA plastics); or
- Each separable item constituting >20% by weight of the total primary and secondary packaging, must be recyclable in Australia. This may be demonstrated using the Australian Packaging Covenant's Packaging Recyclability Evaluation Portal (PREP).
- Paper and cardboard packaging must be either certified under recognised forest certification scheme (e.g. FSC or PEFC) or contain at least 30% recycled content by weight.

Material used for the transport of products (tertiary packaging) and whose disposal is not the responsibility of the end-consumer may be exempted from the above requirements if they are re-used by the applicant, or are recyclable in specialist recycling facilities.

#### Demonstration of Conformance

**DoC 34.1:** Details of materials used as packaging, including information on the input of recycled and virgin materials reported by weight if applicable. The recycled content can be averaged over a 12-month period to find the amount or range of recycled content; and / or

**DoC 34.2:** Evidence of recyclability or copy of PREP Assessment Report; and/or

**DoC 34.3:** Evidence of certification under relevant forest certification scheme; and/or

**DoC 34.4:** Details of re-use programs for transport materials within the applicant company.

### 7.2 Recyclability

**Criterion 35:** The coating of the steel product must not make the product unusable for recycling in steel mills.

#### Demonstration of Conformance

**DoC 35.1:** Evidence that a steel mill is able to take back and recycle this steel product.

### 7.3 Product Information

**Criterion 36:** The manufacturer shall provide written information to the consumer clearly stating:

- The intended use of the product;
- Instructions for correct use and storage so as to maximise the product lifetime;

- Maintenance instructions, including cleaning instructions, if required. Maintenance instructions shall not specify the use of any chemical or coating limited by any part of this standard; and
- Recycling instructions for the product end of life.

#### **Demonstration of Conformance**

**DoC 36.1:** Copy of documentation to be supplied with the product clearly stating the required information if they are re-used by the applicant or are recyclable in specialist recycling facilities.

## 8. ENVIRONMENTAL CLAIMS

*This section addresses the need to ensure that any environmental claims made beyond this standard's scope by the manufacturer are verifiable.*

### 8.1 Public Claims

**Criterion 37:** The applicant's public claims regarding the product's environmental performance beyond this standard's scope (other than GECA certified content) shall be independently verified as compliant with ISO 14021: Environmental Labels and Declarations – 'Self-Declared Environmental Claims' (Type II Environmental Labelling) requirements. Also refer to the GECA Rules for the Use of the Good Environmental Choice Australia Mark.

#### Demonstration of Conformance

**DoC 37.1:** Report or statement from the applicant listing all public environmental claims regarding the product by the applicant, demonstrating compliance to ISO14021; and

**DoC 37.2:** A signed declaration from an Executive Director of the applicant company stating that any environmental claims made by the company regarding the product in the future will be verified using ISO 14021 and/or the GECA certification.



## SOCIAL CRITERIA



### 9. SOCIAL AND LEGAL COMPLIANCE

*This section addresses compliance with the legal and social attributes of the producer and the applicant company; it also engages with the supply chain to ensure human and labour rights are upheld. These criteria are common to all GECA standards. The social aspect partially addresses the third dimension of sustainability - society. This concept was first understood by producers under the name "Corporate Social Responsibility" (CSR). In this standard, social criteria include laws for equal opportunity, safety and protection of workers, and compliance with human and labour rights. GECA certification cannot be given to any company that illegally exploits workers or their families.*

**Note:** In cases where there is a conflict between GECA requirements in this section and relevant legislation or regulations introduced by governments and agencies, national legislation overrides state legislation and state legislation overrides regulations and standards issued by GECA. Where the GECA requirements go further than the applicable legislation, the producer and/or applicant company shall comply with applicable law while trying as far as possible to act in accordance with the spirit of the GECA requirements.

#### 9.1 Environmental Legislation

**Criterion 38:** The producer of the product and applicant company shall as per law comply with relevant environmental legislation and government orders at the Local, State, and Commonwealth levels (if these have been issued). Where a producer is from an overseas jurisdiction, it is that jurisdiction's environmental regulations that apply. Where the producer has been found guilty of a breach of any environmental legislation or permit(s) within the last two years, there must be evidence of corrective action.

#### Demonstration of Conformance

**DoC 38.1:** Signed declaration from an Executive Officer of the organisation stating compliance with applicable environmental legislation and government orders;

**DoC 38.2:** Signed declaration disclosing any breaches of environmental legislation or permits and the date of the breach. Applicant shall:

**DoC 38.3:** Provide a Legal Register listing applicable environmental legislation (including applicable Regulations under that legislation) in, or as an attachment to the above two declarations (DoC 38.1 and DoC 38.2). The Legal Register shall:

- For each applicable Act and Regulation listed, state whether the manufacturer and applicant company comply; or have a certified ISO 14001, Eco-Management and Audit Scheme (EMAS) or equivalent environmental management system in place; and;
- List relevant permits granted by the EPA or an equivalent national, state or local body;

**DoC 38.4:** Evidence of corrective action following identification of a breach of environmental legislation, if applicable.

**Note:**

In this criterion, 'Regulation' means an entire regulatory instrument (for example, the Environmentally Hazardous Chemicals Regulation 2017) and not the individual sections, provisions or clauses of a regulatory instrument.

## 9.2 Minimum Entitlement including Wages

**Criterion 39:** All employees and contractors must receive at least the applicable minimum wage including penalty rates, allowances and superannuation and be provided with all other minimum entitlements including in relation to hours, leave and termination. All employees shall be covered by a Federal or State award, a certified industrial agreement or registered agreement as determined by the Australian Government Workplace Authority or a State or Territory Workplace Relations Agency, or an agreement that complies with Fair Work Act 2009 section 61 – National Employment Standards. A manufacturer/applicant company shall demonstrate compliance to the following requirements as taken from the [ILO](#) Convention: Convention 100 – Equal Remuneration Convention.

Where a producer is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply.

Where a producer/applicant company or a third party has identified a breach of applicable legislation, including underpayment of wages within the last two years, there shall be evidence of corrective action.

### Demonstration of Conformance

**DoC 39.1:** Signed declaration from an Executive Officer of the organisation confirming compliance with all minimum entitlements including wages; and

**DoC 39.2:** List of applicable awards, certified industrial agreements or registered agreements and the number of workers to which they apply, and number of workers not covered by such; and

**DoC 39.3:** Text or template of a typical workplace agreement offered to employees of the company; and sample payslips; and

**DoC 39.4:** Evidence of corrective action following identification of a breach of legislation, if applicable.

## 9.3 Workplace Health and Safety

**Criterion 40:** A manufacturer/ applicant company shall demonstrate compliance to the following requirements as taken from the ILO Conventions:

a) Convention 155 – Occupational Safety and Health and its accompanying Recommendation No. 164;

b) Convention 161 – Occupational Health Services and its accompanying Recommendation No. 171

And general compliance with applicable State or Territory Legislation concerning Occupational, Health and Safety (OHS) / Work Health and Safety (WHS) and/or the Commonwealth Safety, Rehabilitation and Compensation Act 1988, where applicable. Where a manufacturer is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply. Where a producer/applicant company has been found guilty of a breach of relevant legislation within the last 2 years, there shall be evidence of corrective action.

### Demonstration of Conformance

**DoC 40.1:** Signed declaration from an Executive Officer of the organisation stating compliance to workplace legislation and government orders, as well as declaration of any breaches of legislation and the date of the breach. Applicants shall list all applicable legislation in, or as an attachment to, this declaration;

**DoC 40.2:** Copy of the company Occupational / Workplace H&S policy and procedures;

**DoC 40.3:** Copy of employee induction records, training records, meeting records and risk assessments; or current ISO 45001:2018 (or former OHSAS 18001), AS/NZS 4801 or equivalent certification; or third-party certification stating compliance to Work Health and Safety Act 2011 and the Work Health and Safety Regulation 2011 or equivalent jurisdiction specific legislation; and

**DoC 40.4:** Evidence of corrective action following a breach of legislation, if applicable; and

**DoC 40.5:** WHS incidents register

### 9.4 Equal Opportunity

**Criterion 41:** The manufacturer/applicant company shall demonstrate general compliance with the requirements of the Racial Discrimination Act 1975, Sex Discrimination Act 1984, Disability Discrimination Act 1992, Equal Opportunity for Women in the Workplace Act 1999, and complementary State Legislation. The manufacturer cannot be in the list of 'named' or non-compliant employers under the Workplace Gender Equality Act 2012. Where a manufacturer /applicant company is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply. Where a manufacturer has been found guilty of a breach of relevant legislation within the last two years, there shall be evidence of corrective action.

### Demonstration of Conformance

**DoC 41.1:** Signed declaration from an Executive Officer of the organisation stating compliance with above legislation;

**DoC 41.2:** Copy of relevant company policies and procedures;

**DoC 41.3:** Evidence of corrective action following a breach of legislation, if applicable; and

**DoC 41.4:** The assessor will verify that the company does not appear on the following list: [Non-compliant list | WGEA](#)

### 9.5 Lawful Conduct

**Criterion 42:** The manufacturer/applicant company shall not have been convicted of any breach of criminal law, any breach of the Competition and Consumer Act 2010 or the Corporations Act 2001, including prosecution or de-listing by the Australian Stock Exchange (ASX or international equivalent). Where a manufacturer is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply. Where a producer has been found guilty of a breach of relevant legislation within the last two years, there must be evidence of corrective action.

### Demonstration of Conformance

**DoC 42.1:** Signed declaration from an Executive Officer of the organisation stating compliance with above legislation; and

**DoC 42.2:** Evidence of corrective action following a guilty verdict, if applicable.

## 9.6 Modern Slavery

**Criterion 43:** The applicant company shall promote the elimination of Modern Slavery through collaboration with their supply chain, in accordance with the Australian Commonwealth Modern Slavery Act 2018 or NSW Modern Slavery Act 2018 and the following requirements as taken from the ILO Conventions:

- a) Conventions 29 and 105 – Elimination of Forced and Compulsory Labour; and
- b) Convention 182 – Worst Forms of Child Labour

Where an applicant has found instances of modern slavery in their business operations and or supply chains in the past two years, there shall be evidence of corrective action.

This criterion shall be valid for applicant companies of any size and is not restricted to any annual revenue threshold.

### Demonstration of Conformance

**DoC 43.1:** A copy of the published Modern Slavery Statement from within the previous 12 months. The Modern Slavery Statement shall comply with the seven mandatory criteria of the Act as below:

- a) Identify the reporting entity
- b) Describe reporting entity's structure, operations and supply chains
- c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
- d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
- e) Describe how the reporting entity assesses the effectiveness of these actions
- f) Describe the process of consultation with any entities the reporting entity owns or controls
- g) In addition to the modern slavery report, some supporting documents may be asked to be cited at the main site of manufacturing during the on-site assessment:

If a copy of the Modern Slavery Statement is unable to be presented, a rationale will be required. Also in cases where supportive documentation is unavailable at the time of certification, a grace period of three years or one certification period may be granted (no more than one certification period will be given).

The documents may include but not limited to the following documentation to support the modern slavery report:

- h) Employment records
- i) List of contractors
- j) Leave entitlements policy
- k) Any relevant Human Resources policy

- l) Payslips/ wage scales/ remuneration policy
- m) Minimum age of employment policy
- n) Any other relevant information

Where an organisation has not previously reported on the Australian Commonwealth Modern Slavery Act 2018 or NSW Modern Slavery Act 2018 and does not meet the reporting threshold of the NSW or Commonwealth legislation, the organisation shall publish a Modern Slavery Statement within three years of certification on a voluntary basis. A grace period of up to one cycle of certification may be granted depending on the company's reporting period.

For more information about modern slavery and the *Modern Slavery Act 2018*., please see [News and Resources \(modernslaveryregister.gov.au\)](https://www.modernslaveryregister.gov.au).

## 9.7 Human Rights including Labour Rights

**Criterion 44:** The manufacturer/applicant company shall respect internationally recognised human rights, including labour rights, including the rights set out in:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- ILO Declaration on Fundamental Principles and Rights at Work

In particular, this includes the following aspects and ILO conventions: No child/forced/bonded labour (ILO 29 and 105), Minimum age convention (ILO 138), Worst forms of child labour (ILO182), Health and safety procedures and training (155, 161 and 171), Right of freedom of association (ILO 87 and 98), Non-discrimination (ILO 100 and 111), Discipline/harassment and grievance procedures, Fair working hours and compensation, Anti-corruption and bribery.

The applicant company shall also take steps to ensure human rights are respected in its supply chain.

Where an applicant has been found to breach this criterion in the past two years, there must be evidence of corrective action.

### Demonstration of Conformance

**DoC 44.1:** The manufacturer/applicant company shall provide evidence of its commitments to human rights including labour rights (e.g. policies, published reports containing disclosure in relation to human rights (e.g. sustainability report) commitments to international initiatives such as the UN Global Compact); and

**DoC 44.2:** The manufacturer/applicant shall provide a map of at least one tier of its supply chain; and

**DoC 44.3:** Evidence of implementation of a Supplier 'Code of Conduct'; Code of conduct to include Human and Labour Rights, Health and Safety of workers; and

**DoC 44.4:** Evidence of assessment of suppliers in relation to human rights and recommendations for improvements in their supply chain; and

**DoC 44.5:** Evidence of [ISO20400](https://www.iso.org/standard/62646.html) implementation; or

- Evidence of valid [SA8000® Standard](https://www.sa8000.com/), or other equivalent certification; or
- Evidence of being a signatory to the [UN Global Compact](https://www.unglobalcompact.com/); or

- [SEDEX](#) membership ; or
- [GRI 400](#) Report (Global Report Initiative); and

If any of DoC 44.5 cannot be provided, manufacturer/ applicant shall provide:

**DoC 44.6:** Evidence of commitment to achieve SA 8000 certification within one year; or

**DoC 44.7:** Evidence of becoming a signatory to the UN Global Compact within six months;  
and

**DoC 44.8:** Evidence of corrective action, if applicable.

GECA acknowledges that this is an emerging area of compliance and conformance. Therefore, alternative certifications, standards, ethical membership organisations or compliance reporting may be recognised as demonstration of conformance where an exception is granted by the GECA Board.

## EVIDENCE OF CONFORMANCE

### Demonstration of Conformance (DoC)

This section lists the sources of evidence to be considered during an assessment to establish conformance against GECA's standards. This list is provided to guide the applicant through the standard's requirements and facilitate the preparation of an application. The DoC requirements are specified along with each criterion in the standard define specific sources of evidence acceptable to GECA. In cases where criteria offer several DoC requirements, it is the sole decision of the appointed assurance provider to choose the appropriate option throughout the preliminary stage of the assessment. If none of the recommended DoC requirements stipulated for a particular criterion in the standard is applicable for a product under assessment, then the appointed assurance provider may choose an alternative but equivalent source of evidence. In cases where alternative sources of evidence have been accepted for the verification of the product, the assurance provider will inform GECA by providing a report on the details as far as appropriate. GECA will use this information to continuously improve the DoC requirements stipulated by that standard.

All laboratory testing and analysis shall be carried out by a [NATA](#) accredited laboratory. For tests carried out overseas, all analysis shall be carried out by a reputable lab accredited by an [ILAC](#).

The applicant/manufacture shall have processes in place to ensure on-going compliance with the criteria in this standard; for example in relation to hazardous substances, having a process in place for completing a checklist (signed and dated by the authorised person) that lists all the substances and requirements in that section prior to using in/with the GECA product/s. The process may be carried out by relevant supplier/s of relevant material/s if there is no in-house capacity within the organisation being assessed to carry out this process. Documented information about any communication in regards to this process (i.e. between applicant and suppliers) shall be maintained.

The DoC requirements are summarised in Appendix A to assist applicants in preparing documentation for the verification process with a GECA designated assessor.

# APPENDIX A

## APPLICATION CHECKLIST

The application checklist guides the applicant through the application and verification process. An applicant may collect all information required for the verification of the product and attach the relevant documents to their application. The table below summarises the DoC requirements for each criterion in the standard.

Criterion No.	Criterion Content	Demonstration of Conformance See standard body for details	Evidence Attached	Complies Y/N or NA
<b>FIT FOR PURPOSE CRITERIA</b>				
<b>1. Standard Category Scope</b>				
Criterion 1	Scope schedule	Detailed description of the product(s) or product range; and	<input type="checkbox"/>	
		Explanation of applicability of the product(s) to the scope of the standard	<input type="checkbox"/>	
<b>2. Fitness for Purpose</b>				
Criterion 2	Product shall meet or exceed applicable standards and demonstrated fitness levels	Detailed description of the product as it relates to Australian (or other) standards	<input type="checkbox"/>	
		Independent assessment or test reports confirming conformance with relevant standard	<input type="checkbox"/>	
<b>HEALTH CRITERIA</b>				
<b>3. Hazardous Substances</b>				
Criterion 3	Banned substances	Ingredients list for the product and Safety Data Sheet for each ingredient, identification of potential contamination sources	<input type="checkbox"/>	
		For exceptions: a signed declaration from an Executive Director of the applicant company stating the purpose for which the given substance is necessary; clearly outlining how each chemical is used, managed and stored; and evidence that human exposure or environmental contamination is prevented	<input type="checkbox"/>	



Criterion 4	Hazardous materials: Hazardous heavy metals	A description of the policies, procedures and programmes in place to minimise undesirable heavy metals in the feedstock and finished product	<input type="checkbox"/>	
		Testing results of heavy metal concentrations in steel undertaken in accordance with the relevant ISO or ASTM test methods	<input type="checkbox"/>	
Criterion 5	Hazardous materials: should not be treated with halogenated organic compounds; slushing oil or any banned substances	Signed declaration of conformance supported by documentation identifying hazardous substances used in the treatment; and	<input type="checkbox"/>	
		Description of the policies, procedures and programmes in place to ensure that the hazardous substances are not used in treatment of the product	<input type="checkbox"/>	
Criterion 6	Hazardous materials: Hydrofluoric acid shall not be used for pickling of steel before galvanising and coating	Documentation showing absence of HF including the list for all acids and other substances used for steel pickling including SDS of each chemical	<input type="checkbox"/>	
		If an exception is claimed, a standard operating procedure (SOP) for the process in which HF is used outlining all key steps including storage and handling requirements shall be available as guidance for all users	<input type="checkbox"/>	
Criterion 7	Hazardous materials: Chromium VI compounds shall not be used for passivation purposes during steel production	If chromium VI is used, documentation outlining that there is no alternative and that it is reduced to chromium III before disposal or storage	<input type="checkbox"/>	
Criterion 8	Coating: Top-coats and paints classified as non-hazardous	Product SDS showing all hazard identifications including dangerous goods classifications and relevant supporting documentation	<input type="checkbox"/>	
Criterion 9	Coating: Paint	Documentation indicating the full ingredients and formulation of paints and coatings showing it is not formulated with any of the above heavy metals	<input type="checkbox"/>	
Criterion 10	Coating: VOC	The documentation including reports from the paint manufacturer indicating the paint formulation and ingredients used, and report of the measurements or calculations of VOC levels	<input type="checkbox"/>	

Criterion 11	Storage of raw materials and waste	Documentation including photos of storage of steel scrap and hazardous materials/liquids	<input type="checkbox"/>	
		Copy of Spill Response Plan	<input type="checkbox"/>	
		Documentation outlining the procedure in which acids are neutralised and stored, and Cr(VI) is reduced to Cr(III), including a copy of results showing achieving such results	<input type="checkbox"/>	
<b>ENVIRONMENTAL CRITERIA</b>				
<b>4. Material Requirements</b>				
Criterion 12	Virgin mined/quarried raw materials shall come from mining/quarrying operations with environmental and rehabilitation programs	Information about the virgin material procurement program and records of the supplier, nature and geographical source of all virgin mined material inputs; and	<input type="checkbox"/>	
		Certificates or other evidence of implemented EMS; documented mine rehabilitation program, and community engagement or cultural heritage plans	<input type="checkbox"/>	
Criterion 13	Use of recycled materials	Signed declaration of compliance, supported by documentation on procedures and standards for excluding feedstock containing undesirable components	<input type="checkbox"/>	
Criterion 14	Material efficiency	Signed declaration of compliance, supported by calculations	<input type="checkbox"/>	
<b>5. Environmental Management System</b>				
Criterion 15	The applicant and manufacturer shall have an Environmental Management System in place that is in accordance with ISO 14001:2015	Documentation showing an Environmental Management System (in accordance with ISO 14001:2015) is in place, supported by relevant documentation such as ISO14001 certificate, Aspects and Impacts Register, recent certification assessment report and any other information as per the discretion of the assessor	<input type="checkbox"/>	

6. Process Emissions and Resource Management				
Criterion 16	Water management: The steel mill, rolling mills and finishing lines must have effective procedures and systems in place to minimise emissions of oil and grease, suspended solids and metals in waste water	Description including photos of procedures and systems to minimise above emissions	<input type="checkbox"/>	
		Annual improvement plan to minimise above emissions	<input type="checkbox"/>	
Criterion 17	Water management: The steel product manufacturer must have and implement systems to recover process wastewater sludges and sediments	Description including photos of implemented and planned systems to recover process wastewater sludges and sediments	<input type="checkbox"/>	
Criterion 18	Water management: Discharges of contaminants to the natural environment	Document outlining the compliance with all relevant environmental regulations	<input type="checkbox"/>	
Criterion 19	Water management: The steel product manufacturer shall have systems in place to recycle and re-use water	Description including photos of implemented systems to recycle and re-use water	<input type="checkbox"/>	
		Calculation of rate of recycled water	<input type="checkbox"/>	
Criterion 20	Water management: The EAF must use a closed loop cooling water system	Plan/description including photos of the cooling water system	<input type="checkbox"/>	
Criterion 21	Emissions to air: Off-gases from steelmaking must be captured to the maximum extent practicable	Description including photos of implemented systems for off-gas capture	<input type="checkbox"/>	
Criterion 22	Emissions to air: Emissions of dioxins and PCBs from steelmaking via the EAF process must be measured at least annually and reported	Annual dioxin and PCB emissions reporting	<input type="checkbox"/>	
Criterion 23	Emissions to air: NO <sub>x</sub> and SO <sub>x</sub> emissions in the production of the steel must be measured and reported at least annually	Annual NO <sub>x</sub> and SO <sub>x</sub> emissions reporting	<input type="checkbox"/>	
Criterion 24	Emissions to air: Discharges to air from the steelmaking and ancillary processes	Document outlining the compliance with all relevant environmental regulations	<input type="checkbox"/>	
Criterion 25	Dust management plan	Documentation including photos showing a management system as defined in criterion	<input type="checkbox"/>	

Criterion 26	Dust management: For galvanising processes, facilities such as a hood shall be provided	Documentation including photos showing such facilities are in place and record of exposure limit of particles or ash if applicable	<input type="checkbox"/>	
Criterion 27	Greenhouse gas emissions: The steel maker supplying the steel must be a member of the World Steel Association's Climate Action Programme	A current Climate Action Programme certificate from the World Steel Association, confirming that the steel maker is a member of the program, must be provided	<input type="checkbox"/>	
Criterion 28	Greenhouse gas emissions: Carbon reductions	Result of most recent calculations submitted to World Steel Association's Climate Action Programme; not older than two years; or	<input type="checkbox"/>	
		Calculations showing annual reductions for a twelve-month or up to five-year average, where the newest data must not be older than two years; for a recertification, at least the last three years must be covered	<input type="checkbox"/>	
		Outline of planned carbon emissions reductions within the next three years; or	<input type="checkbox"/>	
		Evidence of ResponsibleSteel standard certification; if the certification is for the production site(s), evidence of sources of steel needs to be included; or – if no certification under the ResponsibleSteel standard – evidence of compliance with all Climate Change and Greenhouse Gas Emissions criteria of the ResponsibleSteel standard; or	<input type="checkbox"/>	
		Evidence of compliance with Green Star Design and As Built version 1.2, credit 20.1B 'Energy-Reducing Processes in Steel Reinforcement Production	<input type="checkbox"/>	
Criterion 29	Waste management: Recovery of dedusting dusts and sludges	Documentation including photos of implemented and planned systems of dedusting dusts and sludge recovery	<input type="checkbox"/>	
Criterion 30	Waste management: Uprisings, pre-consumer steel scrap and millscale shall be recycled	Documentation of recycling systems including recycling rates	<input type="checkbox"/>	
Criterion 31	Waste management: effective waste management policies and procedures	Copy of waste management policies and procedures and/or waste management programme and improvement plan	<input type="checkbox"/>	
Criterion 32	Waste management reporting	Documentation of waste management	<input type="checkbox"/>	

Criterion 33	Waste management: spent acid solution shall be recovered and reused	Documentation outlining how and how much of each chemical is being reused or recovered	<input type="checkbox"/>	
<b>7. Packaging, End of Life and Product Stewardship</b>				
Criterion 34	Packaging	Details of materials used as packaging, including information on the input of recycled and virgin materials reported by weight if applicable. The recycled content can be averaged over a 12-month period to find the amount or range of recycled content; and / or	<input type="checkbox"/>	
		Evidence of recyclability or copy of PREP Assessment Report; and/or	<input type="checkbox"/>	
		Evidence of certification under relevant forest certification scheme; and/or	<input type="checkbox"/>	
		Details of re-use programs for transport materials within the applicant company	<input type="checkbox"/>	
Criterion 35	Recyclability	Evidence that a steel mill is able to take back and recycle this steel product	<input type="checkbox"/>	
Criterion 36	Product information	Copy of documentation to be supplied with the product clearly stating the required information if they are re-used by the applicant, or are recyclable in specialist recycling facilities	<input type="checkbox"/>	
<b>8. Environmental Claims</b>				
Criterion 37	Public claims made by applicant	Report or statement from the applicant listing all public environmental claims regarding the product by the applicant, demonstrating compliance to ISO14021; and	<input type="checkbox"/>	
		Signed declaration from an Executive Director of the applicant company stating that any environmental claims made by the company regarding the product in the future will be verified using ISO 14021 and/or the GECA certification	<input type="checkbox"/>	

SOCIAL CRITERIA				
9. Social and Legal Compliance				
Criterion 38	Environmental legislation	Signed declaration confirming conformance to the criterion; and	<input type="checkbox"/>	
		Signed declaration disclosing any breaches of environmental legislation	<input type="checkbox"/>	
		Legal register listing applicable environmental legislation (including applicable Regulations under that legislation)	<input type="checkbox"/>	
		Evidence of corrective action (if applicable)	<input type="checkbox"/>	
Criterion 39	Minimum entitlement including wages	Signed declaration confirming conformance to the criterion; and	<input type="checkbox"/>	
		List of applicable awards, industrial and registered agreements and number of workers who are covered and not covered	<input type="checkbox"/>	
		Text or template of the typical workplace agreement offered to employees, and sample payslips	<input type="checkbox"/>	
		Evidence of corrective action	<input type="checkbox"/>	
Criterion 40	Workplace health and safety	Signed declaration stating compliance to workplace legislation and government orders, as well as declaration of any breaches of legislation	<input type="checkbox"/>	
		OHS/WHS policies and procedures; and	<input type="checkbox"/>	
		Copy of employee induction records, training records, meeting records and risk assessments; or current ISO 45001:2018 (or former OHSAS 18001), AS/NZS 4801 or equivalent certification; or third-party certification stating compliance to Work Health and Safety Act 2011 and the Work Health and Safety Regulation 2011 or equivalent jurisdiction specific legislation; and	<input type="checkbox"/>	

		Evidence of corrective action (if applicable)	<input type="checkbox"/>	
		WHS Incidents register	<input type="checkbox"/>	
Criterion 41	Equal opportunity	Signed declaration confirming conformance to the criterion; and	<input type="checkbox"/>	
		Copy of relevant policies and procedures and	<input type="checkbox"/>	
		Evidence of corrective action (if applicable)	<input type="checkbox"/>	
		The assessor will verify that the company does not appear on the WGEA non-compliant list	<input type="checkbox"/>	
Criterion 42	Lawful conduct	Signed declaration confirming conformance to the criterion; and	<input type="checkbox"/>	
		Evidence of corrective action (if applicable)	<input type="checkbox"/>	
Criterion 43	Modern slavery	Copy of the published Modern Slavery Statement from within the previous 12 months	<input type="checkbox"/>	
Criterion 44	Human rights including labour rights	Evidence of commitments to human rights including labour rights	<input type="checkbox"/>	
		Map of at least one tier of their supply chain; and	<input type="checkbox"/>	
		Evidence of implementation of a Supplier Code of Conduct; and	<input type="checkbox"/>	
		Evidence of assessment of suppliers in relation to human rights and recommendations for improvements in their supply chain	<input type="checkbox"/>	
		Evidence of ISO20400 implementation; or	<input type="checkbox"/>	
		Evidence of valid SA8000® Standard certification or other equivalent certification; or	<input type="checkbox"/>	
		Evidence of being a signatory to the UN Global Compact	<input type="checkbox"/>	
		SEDEX Membership, or	<input type="checkbox"/>	
GRI 400 Report; and	<input type="checkbox"/>			

		Evidence of commitment to achieve SA8000® Standard certification within one year	<input type="checkbox"/>	
		Evidence of becoming a signatory to the UN Global Compact within six months; and	<input type="checkbox"/>	
		Evidence of corrective action (if applicable)	<input type="checkbox"/>	

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Our vision is for a sustainable  
future for people and planet

