CEMENT CONCRETE & AGGREGATES AUSTRALIA

30 September 2026

Productivity Commission
GPO Box 1428
Canberra City
ACT 2601

CCAA Submission on Business Reporting Requirements

Cement Concrete & Aggregates Australia **(CCAA)** welcomes the opportunity to contribute to the Productivity Commission's inquiry into improving the efficiency and value of non-financial business reporting requirements.

CCAA is the voice of the heavy construction materials industry in Australia. CCAA members produce the majority of Australia's cement, concrete, and aggregates, which are crucial to Australia's building and construction sectors.

These materials support the development of our nation's transport, energy, water, housing, defence, and social infrastructure.

Nationally, the industry contributes $20.7 billion to GDP and supports 112,970 jobs across Australia. It generates $6.8 billion in direct value added and underpins activity across the broader economy through extensive supply chain and induced effects.

Scope and reporting costs

This submission responds primarily to Information requests 2, 5 and 6: sustainability and environmental reporting; significant interactions between reporting requirements; and measures to reduce the resulting burden.

CCAA supports transparent, reliable reporting that enables effective environmental oversight and informed decision-making. Our objective is to eliminate unnecessary duplication in data collection, calculation, verification and submission, while maintaining the quality and availability of information required by regulators and other stakeholders.

Our members operate within extensive environmental, planning and land-use regulatory frameworks and have substantial practical experience managing biodiversity impacts, rehabilitation and environmental obligations associated with cement manufacturing, concrete production and long-life extractive operations.

The inquiry should distinguish between the cost of meeting environmental obligations and the additional administrative cost of demonstrating compliance through multiple reporting processes. The relevant question is whether businesses are required to recollect, recalculate, reformat, verify or resubmit information already available to another regulator, without a corresponding improvement in the information needed for oversight.

Reporting costs should be assessed across the full reporting cycle, including staff time, external consultants, repeated surveys and technical investigations, reconciliation of different methodologies, preparation of consultation and compliance reports, audit and verification requirements, information systems and management review. The assessment should include both routine reporting and information requests associated with project modifications, later development stages and changes to reporting requirements.

The assessment should distinguish upfront implementation costs from recurring costs and consider the cumulative burden across sites, corporate entities and jurisdictions, including the implications for smaller operators.

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Reducing demonstrably unnecessary reporting would allow resources to be redirected towards productive activity, investment and environmental improvements.

The assessment should extend beyond quarry developments to information requirements associated with upgrades to existing cement manufacturing facilities, including alternative fuels, carbon capture, supplementary cementitious materials and resource recovery. CCAA's July 2026 submission to the Queensland Productivity Commission identified these investments as part of the wider construction materials sector affected by overlapping environmental processes.

Recognition and reuse of environmental information

Consistent with this approach, in its July 2026 submission on the Draft National Environmental Standard for Data and Information, CCAA recommended the adoption of a "collect once, use many times" approach to environmental information.

Data, surveys, assessment reports and monitoring information prepared for State and Territory planning, biodiversity, quarry approval or environmental licensing processes should be recognised for Commonwealth purposes where they are fit-for-purpose and equivalent in effect.

Following a meeting of Australia's Environment Ministers on 18 September, CCAA reiterated its support for an "assess once, approve once" approach that recognises equivalent State assessment processes. CCAA welcomed the commitment to deliver new or updated bilateral assessment agreements for all jurisdictions by mid-2027, alongside further work on bilateral approval agreements and clarification of interim arrangements. CCAA's position is that these arrangements should recognise State environmental assessments, technical studies and consultation where they meet Commonwealth requirements.

For this Inquiry, the relevant issue is how these arrangements can give practical effect to "collect once, use many times". Information requests should be coordinated between jurisdictions, with proponents able to maintain one coherent data package and reuse fit-for-purpose surveys, technical studies, assessment reports and monitoring information wherever requirements are equivalent.

Recognition should depend on whether information meets the receiving agency's requirements for coverage, methodology, currency, detail and quality. Regulators should publish objective criteria for when information is sufficient and make their requirements clear early in the process. Once fit-for-purpose information resolves material uncertainty relevant to a decision, repeated requests should not occur without a clear and material reason.

Any further request should identify the specific uncertainty to be addressed; explain why existing information is inadequate and seek only the supplementary information necessary. Requirements should be proportionate to project scale, complexity and environmental risk, supported by clear service standards, rather than seeking perfect or exhaustive datasets.

For later project stages and minor modifications, existing information should remain usable where it is fit-for-purpose, and the change does not materially alter likely impacts on protected matters. Guidance should distinguish when existing information is sufficient, when targeted supplementary surveys are needed and when new data collection is justified.

The same approach should apply to community-engagement documentation. In its 3 July 2026 submission to DCCEEW on the draft EPBC Standard Community Consultation, CCAA sought recognition of equivalent State and Territory consultation. Engagement plans, summaries of public input and reports explaining how feedback was considered should be reusable where they remain current, relevant to protected matters and equivalent in effect. Supplementary documentation and engagement should address material changes or new issues rather than require the whole process to restart. This would preserve meaningful engagement while avoiding parallel reporting and publication requirements.

These observations build on CCAA's June 2026 submission to the Department of Climate Change, Energy, the Environment and Water's consultation package *Environment Protection Reforms Setting up for Success*, in which we supported transparency and accountability in environmental management, while emphasising that reporting obligations should be consolidated wherever possible to avoid multiple reporting requirements addressing substantially the same matters.

A single reporting framework

Accordingly, that submission supported development of a single reporting framework that:

- aligns Commonwealth and State reporting requirements;
- recognises existing reporting systems;
- avoids duplication of data collection;
- uses consistent methodologies; and
- minimises administrative burden.

A single reporting framework should establish common data definitions, compatible formats and clear rules for recognising and reusing information. It should not become an additional reporting layer or require businesses to replace functioning systems without a demonstrated net benefit.

Agencies should be able to access relevant information already supplied, subject to appropriate legal authority, confidentiality and data-quality safeguards. Sharing information between regulators should not automatically make that information publicly available. Transparent arrangements should govern ownership, licensing, access, publication and reuse, with protection for commercially sensitive resource and reserve information, proprietary methodologies, landholder and contractual information, site security, personal information and culturally sensitive material.

Proponents should receive notice of proposed publication and an opportunity to identify information requiring aggregation, de-identification, redaction or withholding. Public registers should distinguish final approved information from draft, contested or superseded material and provide a correction mechanism. Data, publication and confidentiality requirements across the National Environmental Standards should be aligned rather than require businesses to prepare inconsistent versions of the same information.

The Commission should examine barriers to this approach, including restrictions on information sharing, incompatible systems, inconsistent business and site identifiers, and uncertainty about responsibility for validating and correcting shared information. Businesses should have a clear process for correcting reused data and confirming which reporting obligations have been satisfied.

Shared government datasets and registers should identify their source, currency, methodology, confidence, limitations and update arrangements. Where credible, contemporary site-specific evidence differs from government mapping or desktop information, decision-makers should consider that evidence and explain how it has been treated. Accessible spatial data and compatible mapping services should support reuse without unnecessary reformatting.

Reuse for cumulative impact assessment or bioregional planning should operate under transparent rules covering attribution, version control, limitations and permitted uses. Individual proponents should not be required to fill broader regional data gaps beyond impacts reasonably attributable to their action. Strategic studies should reduce repeated information collection and enable more targeted requests, while retaining project-specific investigations where necessary.

Coordination should extend to monitoring, auditing, compliance and incident information. Agencies should clearly identify their respective responsibilities, including which regulator leads relevant activities and how information will be shared. Equivalent State audit processes and compliance evidence should be recognised where suitable, with risk-based verification and minimal unnecessary interference with ongoing operations. Shared reporting arrangements should clearly identify the obligations satisfied while preserving necessary incident notification and regulatory oversight.

For biodiversity offsets, the objective should be a single, outcomes-equivalent information package supported by clear rules for translating metrics, reconciling baselines and recognising monitoring and verification evidence. These matters should be coordinated early rather than requiring separate calculations and reports for substantially the same impact. Reuse should not assume that State approval alone establishes Commonwealth compliance, or permit biodiversity gains to be counted twice.

Where biodiversity information is used for both Nature Repair Market participation and environmental offset assessment, the framework should support a single, consistent evidence base. The respective roles of the Clean Energy Regulator and National EPA should be clearly defined, with coordinated information requests and early guidance on offset eligibility to minimise repeated assessment and documentation.

Sustainability reporting and proportionate requirements

This principle is particularly important in relation to greenhouse gas reporting, biodiversity monitoring and environmental compliance reporting.

The Commission should also examine opportunities to reuse existing emissions and energy data in sustainability reporting and related supply-chain information requests. This should distinguish direct reporting obligations from requests made to suppliers to support another business's reporting. Where underlying data is suitable, standardised requests and recognition of existing information should be preferred to repeated bespoke questionnaires or calculations. This should not assume that different reporting frameworks have identical boundaries or information requirements.

CCAA's June 2026 EPBC subordinate legislation submission also identified a need to clarify whether greenhouse gas reporting thresholds apply to an individual proposed action or the broader facility, the purpose and form of certification for projects below a threshold, and the interaction with existing National Greenhouse and Energy Reporting obligations. Clear rules should identify when existing data and methodologies may be relied upon and what additional information, if any, is required.

Reporting frequency, thresholds and verification requirements should be proportionate to the information's use, environmental risk and business circumstances. Less frequent routine reports, or declarations that there has been no material change, should be considered where justified, without weakening necessary monitoring or prompt incident notification. Reporting data periods should be aligned where practical, while allowing submission arrangements that avoid concentrating multiple obligations into the same workload peak.

State reporting examples

State and Territory agencies should apply the same data-reuse and proportionality principles when developing environmental reporting requirements.

The CCAA 2024 submission to the Queensland Department of Environment, Science and Innovation on a Draft Greenhouse Gas Emission Guideline, stated that the proposed Queensland guideline would introduce another reporting layer covering information similar to that already reported to the Commonwealth. It recommended alignment with the National Pollutant Inventory and the National Greenhouse and Energy Reporting scheme, rather than requiring another reporting format.

CCAA has also raised concerns about reassessing historical, lawfully authorised impacts when an existing authority is amended. Ecological baseline information may not exist for land authorised or disturbed before contemporary assessment requirements commenced. For this inquiry, the relevant reporting issue is the practicality and cost of reconstructing historical information. Requirements should distinguish information necessary to understand additional impacts from unnecessary reworking of previously assessed matters.

For this inquiry, CCAA recommends that existing information be reused where it meets the receiving regulator's needs, with additional collection limited to clearly identified information gaps; and

In the CCAA 2025 submission on the NSW Environment Protection Agency's Draft Environmental Guidelines for Solid Waste Landfills, CCAA supported use of the *National Greenhouse and Energy Reporting (Measurement) Determination 2008* (Cth) to avoid businesses calculating emissions in different ways for different regulators. This illustrates the opportunity to recognise consistent, fit-for-purpose methodologies while preserving the information needed for environmental oversight.

More recently, in the 17 July 2026 CCAA submission on the Draft Biodiversity Conservation Amendment (Biodiversity Offsets Scheme) Regulation 2026, CCAA sought proportionate Biodiversity Assessment Report requirements that recognise existing planning studies, monitoring data and previous investigations. CCAA also identified a risk of substantial rework where new requirements would apply according to a report's certification date, despite surveys and report preparation already being well advanced. It sought transitional protection or targeted supplementary requirements rather than restarting assessment work.

Recommendations

CCAA recommends that the Productivity Commission:

1. **Identify priority duplication through its planned reporting map.** Examine overlapping environmental and sustainability information requirements across Commonwealth, State and Territory agencies, including engagement documentation, biodiversity assessment and offset information, and audit and compliance reporting, distinguishing identical data, similar data requiring reconciliation, and information genuinely needed for different purposes. Prioritise reforms according to their avoidable cost and practical benefit.

2. **Recommend a "collect once, use many times" framework.** Establish agreed data definitions, compatible formats, information-sharing arrangements and recognition of existing fit-for-purpose information. For environmental reporting, examine how these arrangements can be incorporated into bilateral implementation and associated compliance processes, consistent with CCAA's call for recognition of equivalent assessments, coordinated information requests and coordinated reporting requirements. Additional requests should address demonstrable information gaps rather than repeat data collection or submission.

   Establish clear safeguards for data ownership, permitted reuse, confidentiality and publication, together with dataset currency, version control and correction arrangements. Recognise equivalent consultation records, monitoring information and audit evidence wherever suitable.

3. **Recommend proportionate reporting requirements.** Review reporting frequency, thresholds, verification requirements and reporting periods against the value of the information, environmental risk and business circumstances. Remove redundant requirements while retaining information necessary for effective oversight.

   Publish objective information-sufficiency criteria and require further requests to explain the material uncertainty being addressed. For staged developments and minor modifications, recognise existing fit-for-purpose information and require targeted updates rather than a complete refresh unless justified.

4. **Set out a staged implementation pathway.** Identify responsible agencies, published milestones and the costs of transition. For environmental reporting, consider how reporting simplification can be incorporated into the development of bilateral assessment agreements against the mid-2027 timetable, alongside work on bilateral approval agreements and interim arrangements. Assess opportunities to reuse existing systems, avoid unnecessary parallel reporting during transition and measure changes in reporting effort while maintaining the information required for environmental oversight.

   Publish templates, technical guidance and data standards before new requirements commence, with sufficient time for businesses to update systems. Transitional arrangements should recognise surveys and substantial report preparation already undertaken, allowing existing requirements or targeted supplementation rather than unnecessary restarts.

5. **Prevent duplication from re-emerging.** Require proposed reporting obligations to identify their intended users and purposes, explain why existing information cannot meet those needs, and assess cumulative costs alongside existing requirements. Periodic reviews should test whether the information remains useful and whether promised reporting savings have been achieved.

   Assess whether implementation reduces repeated information requests, repeated surveys and administrative rework while maintaining environmental oversight. Regulator service standards and performance should be transparent, publicly reported and regularly reviewed.

For further information or to arrange a meeting, please contact me on or michael.kilgariff@ccaa.com.au.

Yours sincerely

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