

11 April 2025

Climate Change Project Team
EPA Vic
GPO Box 4395
Melbourne 3001

Via online Engage Victoria submission portal available [here](#):

Draft Pre-Application Engagement Guidance

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments to the EPA Vic on the Draft Pre-Application Engagement Guidance.

CCAA is the voice of the heavy construction materials industry in Australia. Our members operate cement manufacturing and distribution facilities, concrete batching plants, hard rock quarries and sand and gravel extraction operations throughout the nation. CCAA members produce the majority of Australia's cement, concrete & aggregates, and ranges from large global companies to SMEs and family operated businesses.

Representing an industry that generates \$15 billion in annual revenues and contributes to the employment of approximately 110,000 Australians, CCAA supports effective community and stakeholder engagement to ensure a sustainable industry.

CCAA **recommends** that the EPA accepts community engagement plans developed under the *Mineral Resources (Sustainable Development) Act 1990 (MRSDA)* and *Mineral Resources (Sustainable Development) (Extractive Industries) Regulations 2019* and relevant guidelines as having satisfied the EPA Pre-Application Engagement requirements. This position was supported by the Minerals Council of Australia and the Construction Materials Processors Association at the EPA Resources Energy & Extraction, Sector Consultation Group meeting on 13 March 2025.

This proposal will reduce regulatory duplication between the EPA and Resources Victoria and provide consistency of approach for industry.

The MRSDA specifies that Work Authority holders have a duty to consult with their community across the entire life cycle of a Work Authority from exploration, through to development, operation, closure and rehabilitation.

In addition, the MRSDA further requires that community engagement plans are prepared to document the commitments that a Work Authority holder has made to engage with the community. The Regulations stipulate the minimum requirements to be included in a community engagement plan.

The Resources Victoria [Guideline](#) follows IAP2 principles and can be used by both mining and extractives industries.

Victoria's regulatory environment needs to be internationally competitive to continue to attract capital to invest into Victoria to ensure a sustainable and competitive heavy construction materials industry. This in turn facilitates Victoria's improved productivity, housing affordability and lower infrastructure costs.

To discuss this submission further, please contact Roger Buckley at roger.buckley@ccaa.com.au.

Yours sincerely

MICHAEL KILGARIFF
Chief Executive Officer