

24 October 2025

EPA Vic
GPO Box 4395
Melbourne 3001

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

Draft Risk Management and Monitoring Program Guideline

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments to the EPA Vic on the Draft Risk Management and Monitoring Program (RMMP) Guideline.

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 and efficient regulation and stakeholder engagement to ensure a sustainable industry.

CCAA **recommends** that the EPA accepts the Risk Management Plan developed as part of a Work Plan or Work Plan Variation developed under the *Mineral Resources (Sustainable Development) Act 1990 (MRSDA)* and *Mineral Resources (Sustainable Development) (Extractive Industries) Regulations 2019* and outlined in the [Preparation of Work Plans and Work Plan Variations, Guideline for Extractive Industry Projects, December 2020](#) (Work Plan Guide) as having satisfied the EPA RMMP requirements.

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

The risk management process outlined in the Work Plan Guide is similar to that outlined for the EPA, requiring:

- Hazard-specific identification of sensitive receptors (environment, public health/amenity, land & infrastructure);
- A risk register, detailing hazard, risk, consequence, likelihood, inherent risk, controls, residual risk, and project phase context;
- A Risk Treatment Plan, equivalent to the EPA's Trigger Action Response Plan;
- Inherent vs. residual risk ratings; and
- Monitoring on effectiveness of controls.

This Risk Management Plan demonstrates to Resources Victoria that operational risks are identified and adequately controlled for approval and regulation. This is exactly the same outcome that EPA requires.

CCAA notes that while the Risk Management Process outlined in the Work Plan is similar to the EPA RMMP process, there are differences in specific risks to be included and emphasised in the respective Risk Registers (e.g. Geotechnical Risks). This may lead to some difficulties in preparation of Risk Treatment Plans that meet both Resources Victoria and EPA guidelines. There is also a possible source of confusion when sites are audited by the EPA and the auditor is unfamiliar with Risk Treatment Plans. Close cooperation with industry during the implementation of this framework is required to ensure any issues are quickly resolved.

The recently updated EPA *Pre-Application Engagement Guidance* has also incorporated this principle of similar requirements under other legislation as satisfying EPA requirements. The EPA Guideline states on page 6:

- Community engagement plans developed under the *Mineral Resources (Sustainable Development) Act 1990* and Mineral Resources (Sustainable Development) (Extractive Industries) Regulations 2019 and relevant guidelines can be used for this purpose.

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, State Director Vic/Tas at roger.buckley@ccaa.com.au.

Yours sincerely

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