CEMENT CONCRETE & AGGREGATES AUSTRALIA

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EPBC Reform Taskforce
Department of Climate Change, Energy, the Environment and Water
Canberra ACT

Via: EPRconsultation@dcceew.gov.au

CCAA Submission – Draft National Environmental Standard for Data and Information

Dear Officials

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to comment on the Draft National Environmental Standard for Data and Information (D&I Standard).

CCAA supports the development of a more consistent, transparent and evidence-based framework for the collection, use and management of environmental information under the EPBC Act.

Improving the quality, consistency and accessibility of environmental information has the potential to support better environmental outcomes, improve decision-making and reduce uncertainty for proponents and regulators alike.

Consistent with CCAA's previous submissions on the EPBC reform package, CCAA considers that the Data and Information Standard should be implemented as a tool for earlier clarity, faster assessment and better decision-making — not as an additional layer of process or a mechanism for open-ended information requests.

The success of the Standard should be measured by whether it reduces rework, repeated surveys, stop-the-clock requests, and inconsistent decision-making, while maintaining strong environmental outcomes.

CCAA notes that this submission should be read together with CCAA's February 2026 submission on the first exposure drafts of the Offsets and MNES Standards, CCAA's May 2026 submission on the revised MNES Standard, CCAA's June 2026 submission on the Environmental Offsets Standard, and CCAA's June 2026 submission on the broader EPBC subordinate legislation package.

Those submissions raise complementary cross-cutting issues regarding alignment, operability, staged projects, State/Commonwealth duplication, fit-for-purpose data and streamlined approvals.

Core recommendation

CCAA recommends that the final Data and Information Standard be implemented to improve up-front clarity, reduce repeated information requests, recognise fit-for-purpose State and Territory data, protect sensitive information, and ensure decision-makers properly consider contemporary site-specific survey evidence.

The Standard should support faster, more predictable assessments rather than creating additional administrative burden.

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General Comments

CCAA broadly supports the principles underpinning the draft Standard, including the objectives of ensuring environmental information is representative, transparent, comparable, reusable and ethically managed.

We also support the policy paper's recognition that environmental information should be capable of supporting multiple regulatory and planning functions, including environmental assessments, cumulative impact assessment, strategic assessments and bioregional planning initiatives.

The proposed framework has the potential to improve consistency between jurisdictions and reduce duplication in environmental information requirements over time.

Industry Context

The cement, concrete and quarrying sectors provide essential materials for housing, transport infrastructure, renewable energy, water infrastructure and broader economic development. Unlike many other forms of development, quarry resources are geographically constrained and can only be developed where suitable resources occur.

Data and information requirements must therefore recognise the practical realities of long-life, staged and location-constrained projects that are already subject to extensive State planning, environmental assessment, biodiversity assessment, quarry approval, monitoring and reporting requirements.

The Standard should support more efficient assessment of these projects, not require unnecessary duplication of surveys or repeated data collection where fit-for-purpose information already exists.

Key Issues

1. Information Requirements Should Remain Proportionate

Environmental information will always involve a degree of uncertainty and professional judgement. The objective of the Standard should be to ensure that information is sufficient to inform sound decision-making, rather than pursuing perfect or exhaustive datasets.

Requiring proponents to continually collect additional information in pursuit of ever-greater certainty risks creating unnecessary delay, cost, and duplication without materially improving environmental outcomes.

The policy paper seeks to improve the quality and consistency of environmental information used in decision-making and proposes a range of requirements relating to metadata, provenance, documentation and information management.

CCAA supports robust environmental information requirements where they contribute meaningfully to decision-making. However, the final Standard should recognise that environmental information requirements must remain proportionate to the scale, complexity and environmental risk of a proposal.

The pursuit of increasingly detailed information should not become an end in itself. Information requirements should focus on reducing material uncertainty and informing decision-making rather than seeking perfect or exhaustive datasets.

2. Data Sufficiency and Decision-Maker Accountability

CCAA recommends that DCCEEW provide objective criteria for when data and information are sufficient for referral, assessment and approval purposes. Once a proponent has provided information that is fit-for-purpose and sufficient to resolve material decision-relevant uncertainty, assessment should proceed without repeated requests for additional information unless there is a clear and material reason.

Further information requests should identify the specific decision-relevant uncertainty to be addressed, explain why existing information is inadequate, and be proportionate to the likely environmental risk. This is particularly important for long-life and staged projects where data collection can otherwise become open-ended and delay approvals without materially improving environmental outcomes.

CCAA also recommends that the final Standard be supported by clear service standards and guidance so that data requirements improve assessment efficiency rather than becoming another source of delay.

3. Recognition of Existing Information

The policy paper appropriately recognises that existing information may be sufficient in some circumstances and that further data collection will not always be necessary.

CCAA strongly supports this principle.

Many quarry and construction material projects occur in landscapes that have already been extensively studied through previous environmental assessments, planning processes and government mapping programs. The final Standard should encourage the use of fit-for-purpose existing information and avoid unnecessary duplication of environmental studies.

4. Currency of Government Datasets and Site-Specific Survey Evidence

CCAA strongly supports the use of authoritative datasets where those datasets are current, transparent and fit-for-purpose. However, published or government-held datasets should not be treated as automatically determinative where they are outdated, incomplete or inconsistent with contemporary site-specific survey evidence.

The final Standard and guidance should require key government datasets, mapping layers and habitat/species records to include clear metadata regarding currency, source, limitations, assumptions and update cycles. Where proponents provide credible, contemporary and site-specific survey evidence that differs from desktop datasets, decision-makers should be required to consider that evidence and explain in the statement of reasons, or equivalent decision record, how it has been treated.

CCAA recommends that the Standard include a clear pathway for proponents to correct, supplement or challenge government datasets where project-specific evidence demonstrates that those datasets are no longer accurate or representative.

5. Data Reuse and Cumulative Impact Assessment

The policy paper identifies reusable and comparable environmental information as an important foundation for cumulative impact assessment, strategic planning and bioregional planning.

CCAA supports improved strategic planning and the use of consistent environmental information. However, the increasing use of project-level information within broader cumulative impact assessment frameworks raises important questions regarding methodology, transparency and accountability.

Proponents should have greater clarity regarding how environmental information submitted for one purpose may subsequently be used in cumulative impact assessments, regional environmental analyses and future strategic planning exercises.

CCAA recommends that guidance be developed regarding the use of shared datasets in cumulative impact assessment and bioregional planning processes.

CCAA also recommends that guidance clarify that project-level data supplied by proponents should not be used to impose responsibility on individual proponents for addressing broader regional data gaps or landscape-scale cumulative impacts beyond the impacts reasonably attributable to their action.

Where project-level data is reused for cumulative impact assessment, strategic assessment, bioregional planning or future policy development, there should be transparent rules governing attribution, version control, data limitations and the purpose for which the data may be used. Reuse of data should not retrospectively reopen settled approvals or create new obligations for projects already assessed.

6. Commercial Confidentiality and Intellectual Property

The draft Standard places considerable emphasis on transparency, accessibility and reusability of environmental information.

While CCAA supports transparency in environmental decision-making, the final framework should provide greater clarity regarding the ownership, use and protection of information supplied by proponents.

Safeguards should be established to protect commercially sensitive information, intellectual property and proprietary methodologies where disclosure could create competitive disadvantages or discourage innovation.

For CCAA members, sensitive information may include resource/reserve data, quarry staging information, land access arrangements, commercial offset strategies, proprietary modelling, operational methods, site security information and confidential contractual or landholder information.

The final Standard should provide clear mechanisms for information to be summarised, aggregated, de-identified, redacted or withheld where publication would be inappropriate. It should also clarify that proponents retain ownership of intellectual property and that any government reuse of proponent-supplied information occurs under transparent licence and use conditions.

7. Alignment Between Jurisdictions

CCAA supports the use of the Standard to improve consistency between Commonwealth and state information requirements.

One of the principal benefits of the reform should be a reduction in duplicate information requests and repeated environmental studies across jurisdictions. Implementation of the Standard should seek to maximise mutual recognition and interoperability of environmental information requirements wherever possible.

CCAA recommends that DCCEEW adopt 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.

This is particularly important under bilateral and accredited assessment pathways. The Standard should support mutual recognition of State and Territory information requirements and avoid requiring proponents to reformat, recollect or resubmit substantially the same information solely to satisfy Commonwealth administrative requirements.

This should form part of a broader “single coordinated process” approach to EPBC implementation. Where State and Commonwealth processes are both engaged, proponents should be able to use one coherent data package that satisfies both regimes wherever requirements are equivalent in effect. This will be critical to achieving the reform objective of faster, simpler, and more predictable approvals.

8. Treatment of Existing, Staged and Modified Projects

CCAA recommends that the final Standard and guidance clarify how data and information requirements will apply to existing approvals, projects already in assessment, staged developments and project modifications.

Long-life quarry projects may proceed over many years and require updated staging, design refinements or modifications as resource knowledge, market demand and operating conditions evolve. The Standard should not require a full refresh of all environmental information for every later stage or minor modification where existing information remains fit-for-purpose and the change does not materially alter likely impacts on protected matters.

CCAA recommends that DCCEEW provide practical examples showing when existing data can be relied upon, when targeted supplementary surveys are sufficient, and when new data collection would be required. An appropriate transition period should also apply so proponents can adjust systems, formats and internal processes before the Standard is fully enforced.

9. Trusted Data Register and Correction Mechanisms

CCAA supports the development of a register of trusted environmental data and information assets, provided it is transparent, current and subject to appropriate quality control.

The register should include clear information on dataset ownership, provenance, age, methodology, confidence, limitations and update frequency. It should also include a practical mechanism for proponents, experts and other data users to identify errors, submit improved information and seek correction or qualification of datasets.

Without such a mechanism, there is a risk that outdated or inaccurate information becomes embedded in decision-making simply because it appears in a trusted register.

10. Interaction with Other National Environmental Standards

The Data and Information Standard will operate alongside the MNES, Environmental Offsets and Community Engagement Standards. CCAA recommends that DCCEEW ensure these Standards are aligned so proponents are not subject to inconsistent data, publication, consultation, privacy or confidentiality requirements.

In particular, data requirements should support clear decision-making on significant impacts, residual significant impacts, unacceptable impacts, offsets and net gain. They should not create separate or inconsistent evidentiary tests across different Standards.

The Standard should also align with the Community Engagement Standard so that information published for engagement purposes is appropriately summarised, de-identified or redacted where required to protect privacy, commercially sensitive information, cultural information or site security.

The Standard should also clarify how information generated through community engagement processes will be treated where it is used in assessment or decision-making. Community feedback may identify useful local knowledge or potential environmental issues, but where that information is relied upon as evidence of impacts to protected matters it should be subject to appropriate standards of relevance, currency, transparency and reliability.

Decision-makers should not treat unverified community claims as equivalent to contemporary site-specific survey evidence unless the claims are supported by fit-for-purpose data or expert assessment.

Recommendations

CCAA recommends that:

1. The final Standard should explicitly incorporate proportionality and materiality principles, ensuring that environmental information requirements are commensurate with the scale, complexity and environmental risk of a proposal.

2. Environmental information requirements focus on reducing material uncertainty and supporting decision-making, rather than pursuing perfect information or exhaustive datasets where additional information is unlikely to materially influence environmental outcomes or regulatory decisions.

3. Existing fit-for-purpose environmental information be recognised and utilised wherever possible, including information generated through previous environmental assessments, government mapping programs and other regulatory processes, to minimise duplication and unnecessary data collection.

4. Clear guidance be developed regarding the future use of environmental information, including how project-level information may be incorporated into cumulative impact assessments, strategic assessments, bioregional planning and other regional planning frameworks.

5. Environmental information requirements be designed to support data reuse and interoperability across jurisdictions, reducing duplication and enabling information collected for one regulatory purpose to be used, where appropriate, for multiple assessment and planning purposes.

6. Clear protections be established for commercially sensitive information, intellectual property and proprietary methodologies, including transparent arrangements governing ownership, access, publication and reuse of information supplied by proponents.

7. Commonwealth and state environmental information requirements be aligned wherever possible, with a focus on mutual recognition, minimising duplicate studies and reducing unnecessary assessment costs and delays.

8. DCCEEW provide objective criteria for when data and information are sufficient for referral, assessment and approval purposes, including clear limits on further information requests where additional data is unlikely to materially reduce decision-relevant uncertainty.

9. Government datasets, mapping layers and “trusted” data assets include clear metadata regarding currency, source, limitations, assumptions, confidence and update frequency.

10. Where credible, contemporary, site-specific survey evidence differs from desktop or government datasets, decision-makers be required to consider that evidence and explain how it has been treated in the statement of reasons or equivalent decision record.

11. A “collect once, use many times” approach be adopted so that data and surveys prepared for State and Territory planning, biodiversity, quarry approval and environmental licensing processes are recognised for Commonwealth purposes where fit-for-purpose and equivalent in effect.

12. The final Standard and guidance clarify how requirements apply to existing approvals, projects already in assessment, staged developments and project modifications, including when existing data may be relied upon and when targeted supplementary surveys are sufficient.

13. DCCEEW establish clear governance arrangements for any trusted environmental data register, including version control, quality assurance, correction pathways and processes for proponents to submit updated or improved information.

14. The Data and Information Standard be aligned with the MNES, Environmental Offsets and Community Engagement Standards so proponents are not subject to inconsistent or duplicative evidentiary, publication, privacy, confidentiality, or engagement requirements.

15. Guidance clarifies how information generated through Community Engagement Standard processes will be treated under the Data and Information Standard, including how local knowledge, community observations and public submissions will be assessed for relevance, reliability, currency, and evidentiary weight.

16. Templates, technical guidance, data standards and transition arrangements be published before commencement, with sufficient time for industry to update systems and processes.

Conclusion

CCAA supports the overall direction of the Draft National Environmental Standard for Data and Information and recognises the important role that high-quality environmental information plays in improving environmental outcomes and decision-making.

The final Standard should remain practical, proportionate and focused on improving decision quality while avoiding unnecessary duplication, excessive information requirements and uncertainty regarding the future use of environmental information.

Should officials wish to discuss this matter, please contact CCAA's Industry Policy Director, Mr David Rynne via david.rynne@ccaa.com.au and 0431 729 509.

Yours sincerely

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About CCAA

Cement Concrete & Aggregates Australia 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.