

3 July 2026

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 Community Engagement

Dear Officials

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to comment on the Draft National Environmental Standard for Community Engagement (CE Standard).

CCAA supports meaningful, transparent and proportionate community engagement as an important component of environmental decision-making. Effective engagement can improve project design, identify local issues early, support impact avoidance and mitigation measures, and contribute to better environmental outcomes.

CCAA also supports the objective of improving consistency and transparency in community engagement requirements across Commonwealth environmental assessment processes.

Core recommendation

CCAA recommends that the final Community Engagement Standard be implemented to support meaningful, proportionate, and timely engagement without creating an additional approval hurdle, duplicating State and Territory consultation processes, or expanding Commonwealth assessment beyond matters relevant to protected matters under the EPBC Act.

General Comments

CCAA supports the intent of the CE Standard and the recognition that engagement should occur early enough to inform project planning and design, rather than being limited to later stages of assessment. We also support the objective of improving transparency regarding how community input is considered in decision-making.

The policy paper recognises that engagement can improve project design and support the mitigation of impacts on protected matters. CCAA agrees that early engagement can assist proponents to identify local issues, refine project design and reduce environmental impacts before formal assessment processes commence.

Consistent with CCAA's previous submissions on the EPBC reform package, CCAA considers that the Community Engagement Standard should support earlier clarity and better decision-making, not create an additional approval hurdle.

The Standard should be implemented in a way that improves the quality of information before decision-makers, reduces rework and disputes, and supports faster, more predictable assessment pathways.

It should not duplicate existing State and Territory consultation processes or broaden Commonwealth assessment beyond matters relevant to the EPBC Act.

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.

Industry Context

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

Community engagement requirements must therefore recognise the practical realities of long-life, location-constrained projects that are already subject to extensive State planning, environmental assessment, and local consultation processes.

Key Issues

1. Community Engagement Should Inform Decisions, Not Determine Whether Projects Can Be Assessed

The policy paper proposes that proponents seeking access to the Streamlined Assessment Pathway may need to demonstrate engagement consistent with the CE Standard before referral, whereas projects that have not undertaken such engagement may be directed to alternative assessment pathways.

CCAA supports early engagement as a means of improving project planning and environmental outcomes. However, it is important that the final Standard clearly distinguishes between undertaking meaningful engagement and obtaining stakeholder support.

The purpose of engagement should be to identify issues, improve project design and inform decision-making. It should not operate as a de facto approval stage or create an expectation that proponents must secure community agreement before a project can proceed through statutory assessment processes.

Environmental approval decisions should continue to be based on legislative requirements, environmental outcomes and broader public interest considerations rather than the existence or absence of stakeholder support.

CCAA recommends that the final Standard explicitly clarify that proponents are required to undertake meaningful engagement, but are not required to obtain community endorsement, consensus or social licence as a condition of referral, assessment or approval.

2. Engagement Should Remain Connected to EPBC-Relevant Matters

CCAA recommends that the final Standard and guidance clarify that engagement required for EPBC purposes should focus on matters relevant to the protection and management of protected matters under the EPBC Act.

Community engagement may identify broader planning, amenity, traffic, land use or social issues. Those matters are important and are commonly addressed through State and Territory planning and approval frameworks.

However, the Community Engagement Standard should not expand the scope of Commonwealth environmental assessment or create a parallel process for issues already assessed through State planning systems.

CCAA recommends that DCCEEW provide guidance confirming how proponents should record broader community feedback, while distinguishing between feedback relevant to EPBC protected matters and feedback more appropriately addressed through State, Territory or local government processes.

3. Avoiding Duplication

The policy paper appropriately recognises that engagement undertaken under other approval processes may be used to satisfy the CE Standard and that duplication should be minimised.

Many projects undertaken by CCAA members are already subject to extensive consultation requirements under state planning, environmental assessment, quarry approval, resource development and local government processes.

This is particularly important for extractive projects assessed through established State pathways, including development assessment, State significant development, environmental impact assessment, quarry approval and local government consultation processes. Where those processes provide equivalent engagement outcomes, they should be recognised for Commonwealth purposes through bilateral, accredited or other equivalence mechanisms.

CCAA recommends that the final Standard expressly support an “engage once, use once” approach wherever equivalent State or Territory consultation has already occurred. Proponents should not be required to repeat consultation solely to satisfy Commonwealth administrative requirements where the earlier engagement is equivalent in effect and relevant to EPBC protected matters.

This should form part of a broader “single coordinated process” approach to EPBC implementation. Where State and Commonwealth assessment processes are both engaged, proponents should be able to rely on one coherent engagement process that satisfies both regimes wherever requirements are equivalent in effect.

4. Proportionality

The draft Standard proposes a range of engagement planning, reporting and documentation requirements, including engagement plans, publication of project information, summaries of public input and reporting on how feedback has been considered.

While these measures may be appropriate for complex projects, the final framework should clearly recognise proportionality. Engagement requirements should reflect the scale, complexity and risk profile of a proposal and should not impose unnecessary administrative burdens on lower-risk projects.

5. Protection of Commercially Sensitive and Security-Sensitive Information

The draft Standard requires proponents to publish project information, disclose information sources and explain how feedback has influenced project planning and design. CCAA supports transparency, but the final Standard must clearly protect confidential, commercially sensitive, culturally sensitive, security-sensitive and privacy-sensitive information.

Proponents should not be required to publish detailed resource data, site security information, commercially sensitive operational information, confidential land access arrangements, or information that could prejudice competitive position or safety.

CCAA recommends that DCCEEW publish guidance on what information should be made public, what can be summarised or de-identified, and when publication would be inappropriate.

6. Clear Guidance on Consultation Timeframes

CCAA notes that the draft Standard specifies a minimum consultation period of 10 business days in certain circumstances. While this provides an appropriate minimum, additional guidance should be provided regarding the circumstances in which longer consultation periods are expected, having regard to the scale, complexity and potential impacts of the proposal.

Clear guidance would improve consistency for proponents while ensuring community engagement remains proportionate to project risk.

7. Certainty for Streamlined Assessment

CCAA supports the principle that early engagement may assist proponents to access more efficient assessment pathways.

However, clear and objective criteria are needed so that proponents can understand what is required to demonstrate compliance with the CE Standard and access streamlined assessment processes. Uncertainty regarding whether engagement has been "adequate" risks undermining one of the key objectives of the reform program, namely improved certainty and efficiency.

CCAA recommends that DCCEEW provide objective criteria for when engagement is considered sufficient for streamlined assessment, and that this determination be made as early as possible in the assessment process.

Once a proponent has demonstrated compliance with the CE Standard, engagement adequacy should not be repeatedly revisited unless there is a material change to the proposal or the likely impacts on protected matters.

The streamlined pathway should also be supported by clear service standards and decision timeframes so that engagement requirements reduce uncertainty rather than becoming another source of delay or stop-the-clock information requests.

These materials should be available before commencement of the final Standard so proponents can plan engagement activities with confidence and avoid unnecessary delay in referrals or assessment documentation.

8. Treatment of Existing, Staged and Modified Projects

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

For long-life quarry operations, projects may proceed in stages over many years and may require modifications or updates as resource knowledge, staging, market demand and operational requirements evolve. The Standard should not require full re-engagement for every minor modification or later project stage where equivalent engagement has already occurred, and the change does not materially alter impacts on protected matters.

The Standard should also clarify that projects already in assessment should not be required to restart engagement processes solely because the CE Standard commences. Where engagement already undertaken is equivalent in effect and remains relevant to the likely impacts on protected matters, that engagement should be recognised. Any supplementary engagement should be targeted to the specific change, later stage, or new protected-matter issue rather than reopening the whole project.

CCAA recommends that DCCEEW provide practical examples showing when previous engagement can be relied upon, when targeted supplementary engagement is sufficient, and when fresh engagement would be required.

9. Guidance on Engagement with Diverse Communities

The draft Standard refers to engagement with culturally and linguistically diverse communities. CCAA supports inclusive engagement where appropriate.

However, additional guidance is needed regarding when translation of information or other communication measures would reasonably be expected, having regard to the characteristics of the affected community and the nature of the proposal.

Clear guidance would provide greater certainty for proponents while ensuring engagement activities remain proportionate.

10. Interaction with the Data and Information Standard

The Community Engagement Standard will operate alongside the proposed Data and Information Standard.

CCAA recommends that DCCEEW ensure these Standards are aligned so proponents are not subject to inconsistent publication, data management, privacy or confidentiality requirements.

Guidance should clarify how engagement material, public submissions, survey data, monitoring information and feedback summaries are to be handled, including how proponents should manage privacy, commercially sensitive information and information that is not relevant to EPBC protected matters.

CCAA also recommends that the Standard recognise that engagement can assist in identifying local knowledge, but that final decisions should continue to rely on fit-for-purpose, scientifically robust and current information.

Where community engagement identifies factual environmental claims, local observations, or information relevant to protected matters, guidance should clarify how that information is to be recorded, tested and considered under the Data and Information Standard.

Community input can be valuable, but it should not displace contemporary site-specific survey evidence or scientifically robust data unless it is itself supported by appropriate evidence. Decision-makers should clearly distinguish between community sentiment, planning or amenity concerns, and evidence relevant to EPBC protected matters.

Recommendations

CCAA recommends that the Standard be amended in the following ways:

1. Clarify that engagement does not require demonstration of community agreement, consensus or social licence.
2. Recognise equivalent consultation undertaken under State and Territory statutory processes.
3. Apply engagement requirements proportionately according to project scale, complexity and environmental risk.
4. Publish guidance explaining what constitutes appropriate engagement, including practical examples for different project types.
5. Publish guidance explaining when the minimum 10-business-day consultation period is appropriate and when longer consultation would normally be expected.
6. Publish guidance on engagement with culturally and linguistically diverse communities, including when translated material or other communication measures are required.
7. Confirm that engagement required for EPBC purposes should focus on matters relevant to protected matters under the EPBC Act and should not duplicate State planning processes for broader land use, traffic, amenity or social issues.
8. Recognise equivalent State and Territory engagement through bilateral, accredited or other equivalence mechanisms, including an “engage once, use many times” approach where engagement is equivalent in effect, remains current and is relevant to EPBC protected matters.

9. Provide guidance on how the Standard applies to existing projects, staged developments, project modifications and projects already in assessment, including when previous engagement may be relied upon.
10. Confirm that projects already in assessment should not be required to restart engagement processes solely because the CE Standard commences, and that any supplementary engagement should be targeted to material changes or new protected-matter issues.
11. Protect confidential, commercially sensitive, culturally sensitive, security-sensitive and privacy-sensitive information, including by allowing information to be summarised, redacted or withheld where publication would be inappropriate.
12. Align the Community Engagement Standard with the Data and Information Standard so proponents are not subject to inconsistent or duplicative data, publication and privacy requirements.
13. Provide objective criteria for streamlined assessment eligibility and confirm that engagement adequacy should not be repeatedly revisited unless there is a material change to the proposal or likely impacts on protected matters.
14. Support engagement requirements with clear service standards and decision timeframes.
15. Clarify how factual environmental information gathered through community engagement will be assessed under the Data and Information Standard, including how decision-makers will distinguish between community sentiment, local observations, planning concerns, and evidence relevant to EPBC protected matters.
16. Publish templates, guidance, practical examples, and transition arrangements before commencement, with sufficient time for proponents to update internal engagement procedures and project systems.

Conclusion

CCAA supports the overall objectives of the Draft National Environmental Standard for Community Engagement and its focus on improving transparency, consistency and early engagement.

With appropriate safeguards around proportionality, duplication and certainty, the Standard can contribute to better environmental outcomes while supporting efficient and effective assessment processes.

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

Yours sincerely

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Chief Executive Officer

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.