Minerals Council of Australia

23 October 2026

Commissioner
Productivity Commission
4 National Circuit
Barton ACT 2600

By email: businessreporting@pc.gov.au

Dear Commissioner

Improving non-financial business reporting requirements

The Minerals Council of Australia (MCA) appreciates the opportunity to provide a submission to the Productivity Commission's inquiry into improving non-financial business reporting requirements.

Non-financial reporting is a significant productivity issue that imposes costs on the industry and ties up company resources, drawing them away from other activities to manage and improve operations and the broader business.

The Australian minerals industry supports transparent, credible and fit-for-purpose reporting where it adds value by providing material and decision-useful information to regulators, investors and the broader community.

However, reporting is not an outcome. Each requirement should have a clearly identified purpose, audience and material use. The benefits of reporting should justify the cost of collecting, verifying, assuring and submitting the necessary in this case non-financial information.

Australia's non-financial reporting architecture has developed incrementally across jurisdictions and policy areas. While each new requirement is additive, the cumulative impact is generally not considered. This has resulted in overlapping data requests, inconsistent definitions, additional assurance costs, inefficiency and more demands on company resources.

The MCA recommends that governments address the reporting burden by mapping requirements at the data-field level, establishing common definitions through a collaborative framework, agreeing a national 'collect once, use many times' model supported by interoperable federated systems, requiring regulators to justify new reporting requirements, including their cost, benefit and duplication, and periodically reviewing and removing requirements that no longer deliver value.

The attached submission outlines key non-financial reporting 'sustainability' issues for consideration. The MCA would welcome the opportunity to provide further input into the inquiry or work with government on resolving these issues.

Should you have any questions, please contact Chris McCombe, General Manager – Sustainability, on 02 6233 0600 or Chris.McCombe@minerals.org.au.

Yours sincerely

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MCA SUBMISSION - INQUIRY INTO NON-FINANCIAL BUSINESS REPORTING

1. OVERVIEW

The Australian minerals industry is subject to Commonwealth, state and territory reporting regimes. Over time, the reporting burden on industry has increased, driven by new government regulatory, policy and transparency initiatives. This is becoming an increasing drag on productivity.

Reporting should not be an end in itself. Reporting requirements should have a clearly identify user and a tangible purpose for which it is required that warrants the impost on business. The level of detail, reporting frequency and assurance should be necessary and proportionate to that purpose. There should be a positive duty for periodic review of reporting obligations and actively reduce or eliminate requirements that are duplicative, unnecessary or no longer proportionate

Individual reporting obligations may be justified when considered in isolation, however the cumulative burden should be also considered. When combined these obligations require the same or similar information to be collected, recalculated, repackaged, verified and submitted multiple times.

Unnecessary or duplicative reporting is a contributing factor that drags on productivity. It creates unnecessary cost for industry and ties up company resources in reporting processes, where those resources would be more effectively deployed to operations or business improvement.

Accordingly, the MCA considers the appropriate starting point is not simply how reporting can be made easier but whether each item of information has a clear user, purpose and genuinely informs decision-making. Where these cannot be demonstrated, the requirement should be removed, reduced or consolidated.

Overarching recommendations

The following recommendations can be broadly applied to the range of reporting frameworks, however, the priority and emphasis given to these will depend on the characteristics of each individual program.

1. **Map the reporting landscape at a data-field level:** Identify specific data requested, including definitions, calculation methods, entity boundary, timing, format, assurance, recipient, purpose, audience, decision-use to identify where sufficient data is collected elsewhere, its similarities and divergences.
2. **Review the continuing value of existing requirements:** Initial and ongoing review to test actual use, purpose, risk, materiality, cost, duplication and data quality, with a clear objective to remove or consolidate obsolete and low-value requirements. Reviews should focus on priority reporting initiatives, such as climate reporting and the National Pollutant Inventory.
3. **Create a collaborative framework for common definitions:** Governments, regulators, reporting entities and technical experts should align definitions and standards where purposes are comparable, and document why any departure is necessary.
4. **Agree a national 'collect once, use many times' model:** A national agreement should be supported by interoperable, federated systems through which authorised agencies can retrieve agreed data. This is similar to the intent of the Environment Information Australia which aims to be a national hub for environmental information
5. **Positive obligation to reuse data and justify new reporting:** Before introducing or expanding a reporting requirement, Commonwealth and state regulators should be required to demonstrate that it is necessary, proportionate and not duplicative. The regulatory impact process should estimate compliance costs for different size businesses; explicitly identify benefits for intended users; and demonstrate equivalent information is not already collected elsewhere. Explicit consideration should also be given to cumulative burden.

2. REPORTING BURDEN

Reporting obligations impact on productivity by diverting financial and human resources from adding value to the business through operational and business improvement activities.

Reporting and required assurance is a significant undertaking for mining companies, particular where they operate across jurisdictions in addition to multiple levels of government.

When reviewing the burden placed on industry by existing and new reporting obligations, all components of reporting should be considered including:

- **System set-up costs:** New or changing reporting requirements require companies to establish or modify data collection, management and reporting systems, creating substantial upfront implementation costs.
- **Data collection/compliance costs**: Direct and indirect costs across data collection, analysis, preparation, review, governance and lodgement of reports.
- **In-house resourcing:** Reporting draws on resources across operational specialist and management functions diverting these resources from core business activity
- **External specialists:** The complexity and specialist nature of some reporting obligations may require engaging specialist consultants which adds material costs to compliance.
- **External assurance:** Assurance requirements can add significant further cost and complexity, particularly where similar information must be subject to different assurance processes across reporting regimes.

The design and implementation of reporting requirements materially affect each of these costs. The principal drivers of unnecessary reporting burden are:

1. **Low-value reporting:** Requirements that lack a clearly identified user, purpose or decision use impose compliance costs without delivering a commensurate regulatory, business or public benefit.
2. **Disproportionate reporting requirements:** Requirements that exceed what is reasonably necessary for the risk, purpose or intended use.
3. **Overlap:** Commonwealth, state and territory regimes may require substantially similar information to be collected, transformed and reported multiple times. In some cases this occurs within departments. Many companies also respond to international reporting frameworks for investment purposes which can further complicate this reporting complexity.
4. **Variation between similar reporting:** Differences in definitions, scope, level of application, methodologies and thresholds and assurance level can result in companies needing to recalculate or reconfigure the same underlying data for different reporting purposes.
5. **Misaligned timeframes:** Misaligned reporting periods and deadlines can require companies to maintain parallel processes and repeatedly extract and reconcile similar information and companies are not provided with flexibility.

3. KEY NON-FINANCIAL REPORTING REQUIREMENTS

This section examines key sustainability and environmental reporting obligations affecting the mining industry and applies the overarching recommendations to each reporting area.

3.1 NATIONAL POLLUTANT INVENTORY (NPI)

The National Pollutant Inventory (NPI), operating since 1998, is the national system for collecting and publicly reporting information on emissions (generally estimated) and transfers of specified pollutants from industrial facilities.

The NPI broadly captures the minerals sector for many of the 93 priority substances listed. The minerals industry is covered under both mining specific and general guidance. NPI emissions are estimated using approved methodologies, which may include direct measurement, mass balance, engineering calculations and emission factors.[1]

NPI reporting is a significant impost on the minerals industry. It requires substantial internal resourcing at facilities to identify and collect data, as well as specialist interpretation and to calculate emissions that are not directly measured. Given the specialist nature of the NPI – companies usually do not hold this in-house as it not deemed beneficial to do so - consultants are often engaged to support companies in responding to this reporting obligation which brings additional costs.

One company with a single asset estimated NPI reporting took up to three weeks of internal resource time to find, verify, audit and input NPI data and cost around $10,000 for specialist consultant support. This is in addition to internal processes for senior review and sign-off of reporting components. NPI reporting would be significantly more burdensome/costly for larger companies with more complex operations.

A central issue for the NPI is whether the information collected continues to deliver sufficient value. The original NPI impact statement states the NPI purpose to enhance and facilitate policy formulation and decision making for environmental planning and management, satisfy community needs about emissions data and promote waste minimisation and cleaner production. However, the extent to which governments and other stakeholders use the information, understand its context and rely on it in decision-making is unclear. Furthermore, in the intervening years since establishment, numerous additional regulatory processes (including environmental impact assessments) have been established which now take the dominant regulatory lead on these environmental matters.

Other issues include confidence in the estimation techniques used to derive NPI data and whether this is sufficient basis to support sound policy making. The Department of Climate Change, Energy, the Environment and Water (DCCEEW) notes the varying level accuracy of estimation techniques.[2] Furthermore, diffuse sources are poorly accounted for and not updated, which further limits the utility of NPI data.

The NPI does not account for risk in reporting obligations and provides data but little information on what it means at the regional or national level or in terms of individual exposure. For example, the emission of particulate matter at remote operation verses operations with neighbouring communities carry different risk profiles in terms of exposure of populations.

Air shed quality is managed by state authorities and emissions of listed substances to air, water or land require site specific authorisations, making NPI further redundant in a policy sense.

It should be noted that Australian mining companies may also report comparable air-emissions information under voluntary international frameworks such as Sustainability Accounting Standards

[1] DCCEEW, *National Pollutant Inventory data*, Australian Government, updated 21 April 2026, National Pollutant Inventory data.
[2] DCCEEW, Understanding NPI data - DCCEEW, viewed October 2026

Board (SASB) in addition to NPI reporting.[3] While SASB is not itself an Australian regulatory requirement, it is incorporated into the broader International Financial Reporting Standards architecture and reference in the voluntary Australian Accounting Standards Board - General Requirements for Disclosure of Sustainability-related Financial Information (AASB S1).[4]

Application of recommendations:

The actual use of NPI information should be reviewed to determine whether the reporting requirements remain material and decision-useful, how they intersect with state pollutant/emissions regimes, and whether overlapping or low-value requirements should be consolidated or phased out.

3.2 CLIMATE REPORTING FRAMEWORKS

Climate reporting imposes significant obligations on the minerals industry and is characterised by overlap, inconsistency and continuing expansion.

Key climate and emissions reporting regimes that commonly apply to the industry include:

- National Greenhouse and Energy Reporting Act 2007 (Cth) (NGER) Act
- Safeguard reporting (linked in NGER)
- State-based emissions reporting
- Australian Accounting Standards Board (AASB) S2 financial climate-related Disclosures.
- Australian Bureau of Statistics Energy and Water Survey
- Environmental approvals (forecasting and ongoing reporting of emissions at the state level).
- Voluntary climate reporting and international/market related obligations for some companies (e.g. carbon footprinting)

In addition, there is an increasing focus on forward reporting of emission estimates in environmental approvals, for example under 2025 changes to the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Some climate-reporting obligations, including climate-related financial disclosures required under the *Corporations Act 2001* and AASB S2, impose substantial costs on business. One MCA member with a single operation estimated that limited assurance alone could cost around $120,000, with higher costs likely for larger companies. While the design of these disclosures is beyond the scope of the Commission's inquiry, Box 1 summarises the MCA's key concerns and recommendations.

Box 1 - AASB S2 Mandatory climate-related disclosures

The MCA submission to recent consultation on improving the efficiency of mandatory climate-related financial disclosures raised its significant cost, resource and administrative burden disproportionate to the value it delivers.

The current settings require private companies to prepare complex disclosures despite having limited need to access capital markets, increasing the call on a limited pool of assurers. Scope 3 imposes substantial data-gathering obligations. Duplication arises where entities are already subject to other domestic emissions reporting or equivalent international disclosure regimes.

The MCA recommended a proportionate approach, reducing the level of assurance to limited as a minimum. make reporting optional for privately owned companies, better align climate-related financial disclosure and NGER reporting periods; and recognise equivalent international reporting to avoid duplicate disclosures by foreign-owned Australian entities.

[3] IFRS, Access to SASB standards, IFRS - Company use, viewed October 2026
[4] Australian Accounting Standards Board - General Requirements for Disclosure of Sustainability-related Financial Information AASBS1_09-24, viewed October 2026

The key issues with climate reporting are the need for proportionality - does the data collected provide value - and the fragmented and duplicative way that data must be reported. Comparable information is required across multiple regimes (e.g. AASB, NGERs, Safeguard), yet differences in definitions, boundaries, reporting periods, assurance levels, calculation methodologies and governance prevent its efficient reuse.

One example of inconsistency in reporting regimes is despite using the same emissions threshold of (>25,000 tonnes CO2-e scope 1 and 2 GHG per year), NGER and the NSW EPA (Climate Change Mitigation and Adaption Plan requirements) apply different reporting boundaries. This requires businesses to disaggregate, reconcile and resubmit substantially the same emissions data, creating unnecessary duplication and compliance costs.[5]

Some companies may also be required to respond to the ABS Energy and Water Survey. The survey collects data on electricity generation, energy, water and fuel usage by businesses and other organisations. The ABS specifically responds to the question of overlap with NGER reporting, noting:

> 'The NGER concept of 'operational control' does not meet all ABS requirements for data necessary to compile estimates comparable to other key ABS economic indicators… Please report all levels of generation and consumption. Do not apply the thresholds used in NGER reporting.' [6]

Reform should therefore focus on creating a more integrated reporting system that reduces repeated processing and assurance costs, makes better use of information already held by government and ensures new requirements do not duplicate existing obligations.

It remains common to report emissions to the State agencies each year as part of the State-based environmental authorisations process in addition to NGER, however requirements may differ such as the reporting boundary.

Application of recommendations

- Allow information reported through NGER or the Safeguard Mechanism to be referenced or reused in other climate disclosures, including AASB S2, without separate reproduction or assurance.
- Align climate and emissions reporting requirements between Commonwealth and state frameworks, including definitions, reporting boundaries, data standards and reporting periods. In general, the aim should be to remove state reporting requirements and instead using NGER reporting wherever possible.
- Avoid repeated assurance of the same data or excessive assurance: The same underlying emissions information should not require separate validation and assurance merely because it appears under another reporting regime.
- Remove the requirement for privately owned companies to report to frameworks (such as AASB S2) designed for those that are publicly listed.
- Improve regulator coordination and data sharing: Commonwealth and state regulators should share emissions information already held by government and coordinate requests for additional data.
- Assess cumulative burden: New climate reporting reforms should be assessed alongside existing and concurrently introduced requirements, recognising the finite availability of emissions, sustainability, finance and assurance expertise. Where new requirements or regimes commences, redundant requires (eg: state emissions reporting following implementation of NGER and Safeguard reforms) should be removed.

[5] Clean Energy Regulator, *Defining a facility for National Greenhouse and Energy Reporting* and *NSW EPA, Climate Change Licensee Requirements* viewed October 2026
[6] Australian Bureau of Statistics, Energy and Water Survey, viewed October 2026

- Apply a climate-reporting duplication test: Before introducing or expanding a requirement, regulators should identify what additional, decision-useful information is needed and demonstrate why existing reporting cannot provide it.

3.3 ENVIRONMENTAL APPROVALS

Environmental regulation can result in significant reporting overlap and duplication within jurisdictions and between Commonwealth and state regimes, particularly where comparable information must be submitted using different terminology, formats or reporting cycles.

For example, For example, in Queensland, related disturbance and rehabilitation data may be required across multiple regulatory processes, including Progressive Rehabilitation and Closure Plans, Annual Returns, Estimated Rehabilitation Costs and the Financial Provisioning Scheme. However, inconsistent terminology, levels of detail and differing reporting cycles can require underlying data to be reconciled or reformatted for different regulatory purposes.

In Western Australia, environmental approvals, environmental licences, groundwater monitoring requirements and Mining Rehabilitation Fund, biodiversity offset reporting and greenhouse gas emissions reporting (where land clearing is an input) can operate on different reporting periods and deadlines, requiring businesses to manage multiple reporting cycles. This requires regular reporting processes throughout the year that divert staff away from operational activities.

Biodiversity information is often reported under both Commonwealth and state approval frameworks. Commonwealth compliance reports and state-based requirements can seek comparable information on monitoring, mitigation, offsets, threatened species, habitat, rehabilitation and offset delivery.[7]

The emergence of other biodiversity reporting should also be recognised, for example the through Taskforce on Nature related Financial Disclosures. There is an opportunity to align definitions and acceptable information sources to reduce complexity and reporting burden for companies.[8]

Commonwealth approval conditions can require reporting of monitoring results, implementation reports and supporting records. Where projects are also regulated under state approvals and environmental licences, similar material may be prepared in different forms for different agencies. While bilateral arrangements can streamline aspects of environmental assessments, they do not necessarily eliminate separate Commonwealth and state compliance reporting requirements.

These overlapping requirements require additional resources to reconcile, validate and repackage data, while inconsistent terminology and detail increase the risk of inconsistent reporting.

In addition to duplication, annual compliance reporting can impose an unnecessary burden where requirements are not proportionate to regulatory need. For example, requiring hundreds of pages of raw data without a demonstrated use can increase preparation and review costs while making material compliance information harder to identify. In these situations, the onus should simply be on the company to retain records to be made available upon request, but not to have to provide this by default.

3.4 WATER

While water reporting is generally captured under environmental approvals compliance requirements, there are other specific reporting requirements that create additional complexity. These include:

- Water take entitlement and/or associated water take reporting – Companies are generally required to record and report surface-water and groundwater extraction under state water

[7] National EPA, *Annual Compliance Report Guidelines*; NSW biodiversity assessment guidance; NSW Biodiversity Offsets Scheme; NSW Biodiversity Management Plan.
[8] The Taskforce on Nature-related Financial Disclosures, viewed October 2026

licences (e.g. reporting take).[9] This may overlap with broader environmental compliance reporting.

- Registration of water interests for foreign investors – certain foreign investors are required to register specific water interests.[10]
- Certain mining companies may also be required to complete the annual ABS Energy and Water Survey, which seeks information on water usage, supply, discharge, consumption and expenditure. The survey informs Australia's environmental-economic water accounts and may draws on underlying information that is also used for water-resource reporting, environmental approvals and corporate water accounts. In responding to the ABS companies often need to reconcile and reformat the same underlying information to meet separate ABS statistical classifications.[11]

It should also be recognised that many companies use international frameworks for water reporting, such as the MCA Water Accounting Framework and other corporate water reporting systems to support annual sustainability reporting. There is an opportunity to align relevant water reporting aspects with these definitions.[12]

Application of recommendations to environmental approvals and water reporting

- Approval compliance reporting should be standardised where risks are comparable, proportionate to risk and linked to the needs of the identified user. Conditions should be reviewed periodically with an explicit focus on ensuring reporting remains necessary, proportionate and fit for its regulatory purposes, and identifying opportunities to remove or consolidate duplicative or obsolete requirements. Obsolete requirements should expire rather than remain indefinitely or be supplemented by further reporting, where they no longer serve an identified regulatory purpose.
- Enhance mutual recognition, cross-referencing and alignment of reporting conditions to reduce duplication while preserving each regulator's oversight.
- Align terminology, data standards and reporting periods, and adopt a 'collect once, use many times' approach so information already provided to government can, where fit for purpose, be reused across agencies, with additional reporting required only where it serves a distinct regulatory purpose. A single digital gateway for submission of this information would support this approach.

3.5 WORKPLACE GENDER EQUALITY REPORTING

The MCA supports the objective of improving workplace gender equality.. Workplace Gender Equality Reporting (WGEA) is relatively distinct from the other reporting regimes considered in this submission and therefore has less interaction with other reporting obligations. However, opportunities may exist to reduce administrative burden through greater alignment with common corporate reporting periods, such as financial year reporting, consistent with broader company sustainability reporting. Aligning these would reduce the need to recalculate workforce data which is measured at an 'as at date' and not cumulative over the reporting period.

[9] For example: Business Queensland, Water reporting for coal and mineral activities
[10] Australian Taxation Office, Registration of water interests for foreign investors viewed October 2026
[11] Australian Bureau of Statistics, Energy and Water Survey, viewed October 2026
[12] MCA, Water Accounting Framework User Guide 2.0, Published 2022