

Community Benefit Principles: draft public guidance

<https://consult.industry.gov.au/future-made-in-australia-community-benefit-principles-draft-public-guidance>

2 February 2026

Dear Minister

***Re: Future Made in Australia (FMA) Community Benefit Principles: draft public guidance***

The Australian Aluminium Council (the Council) represents Australia's bauxite mining, alumina refining, aluminium smelting and downstream processing industries. The aluminium industry has been operating in Australia since 1955, and over the decades has been a significant contributor to the nation's economy. The December 2025 Department of Industry, Science and Resources (DISR) forecast<sup>1</sup> that earnings for Australian exports of aluminium, alumina and bauxite are expected to rise from \$18 billion in 2025–26 to \$19 billion in 2026–27. More than \$14B of this comes from the alumina and aluminium industries, as value adding mineral processing sectors. The industry includes six bauxite mines which collectively produce over 100 Mt per annum making Australia one of the world's largest producers of bauxite. Australia is the world's largest exporter of alumina with five operating alumina refineries producing around 18 Mt per annum of alumina. Australia is the seventh largest producer of aluminium, with four aluminium smelters and additional downstream processing industries including more than 20 extrusion presses. Aluminium is Australia's top manufacturing export.

The Council welcomes the opportunity to provide further input into the draft Community Benefit Principles (CBP) in response to the questions raised in the Consultation Paper (the Paper) to ensure that the principles can be applied in practice across a range of circumstances facing Australia's value adding mining, mineral processing and manufacturing sectors. The Council notes that some of its Members may have also made submissions or provided feedback directly to the Department. This should be considered in conjunction with this submission.

A 2024 study by FTI Consulting<sup>2</sup> on behalf of the Council and its Members found that the industry:

- directly employs more than 21,000 people, including 6,600 full time equivalent contractors;
- average earnings are \$134,000 which is 60% higher than the national manufacturing average;
- indirectly supports a further 55,000 families predominantly in regional Australia; and
- contributes around \$18 B to Australia's GDP annually.

However, in the context of this existing contribution, to the Australian economy, it is worth noting that for these facilities are not "new projects" and consideration therefore needs to be made on how the CBP is applied to existing facilities and their existing contributions to the regions in which they operate. Where these facilitate new projects, for example new renewable energy developments, not all aspects of the CBP will be in control of the entity procuring the energy.

<sup>1</sup> <https://www.industry.gov.au/sites/default/files/2025-12/resources-and-energy-quarterly-december-2025.pdf>

<sup>2</sup> <https://aluminium.org.au/wp-content/uploads/2024/10/250205-AAC-Economic-Contribution-of-the-Australian-Aluminium-Industry.pdf>

Additionally, the Council considers that all requirements should be designed around three core policy principles:

- Clarity — requirements must specify what information is needed, for what purpose, who is responsible for providing it, and how it will be assessed;
- Regulatory efficiency — duplication should be minimised by recognising and leveraging existing regulated plans and reporting frameworks, including clear pathways for the use of already available documentation; and
- Outcomes-based design — settings should maintain a strong focus on achieving measurable outcomes while allowing flexibility to reflect regional, sectoral and workforce differences.

Absent this overarching framework, there is a material risk that the requirements will increase administrative burden without delivering commensurate policy or public interest benefits.

The Council would be happy to provide additional information on any issues raised in this submission.

Kind regards,



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**Feedback on *Future Made in Australia Community Benefit Principles Draft Public Guidance***

**1. Please tell us about you or your organisation, and your interest in the Community Benefit Principles. Future Made in Australia support**

The Council represents Australia's 3 active bauxite exploration projects; 6 bauxite mines; 5 alumina refineries; 4 aluminium smelters and more than twenty aluminium extrusion presses. Alumina and Aluminium have been classified as green metals under the FMA and may be the recipients of future funding, such as through the Green Aluminium Production Credit (GAPC) and other measures. Additionally, the Council represents facilities which currently or in the future may produce Critical Minerals including but not limited to High Purity Alumina (HPA), Fluorine and Gallium which may be eligible for the Critical Minerals Production Tax Incentive (CMPTI).

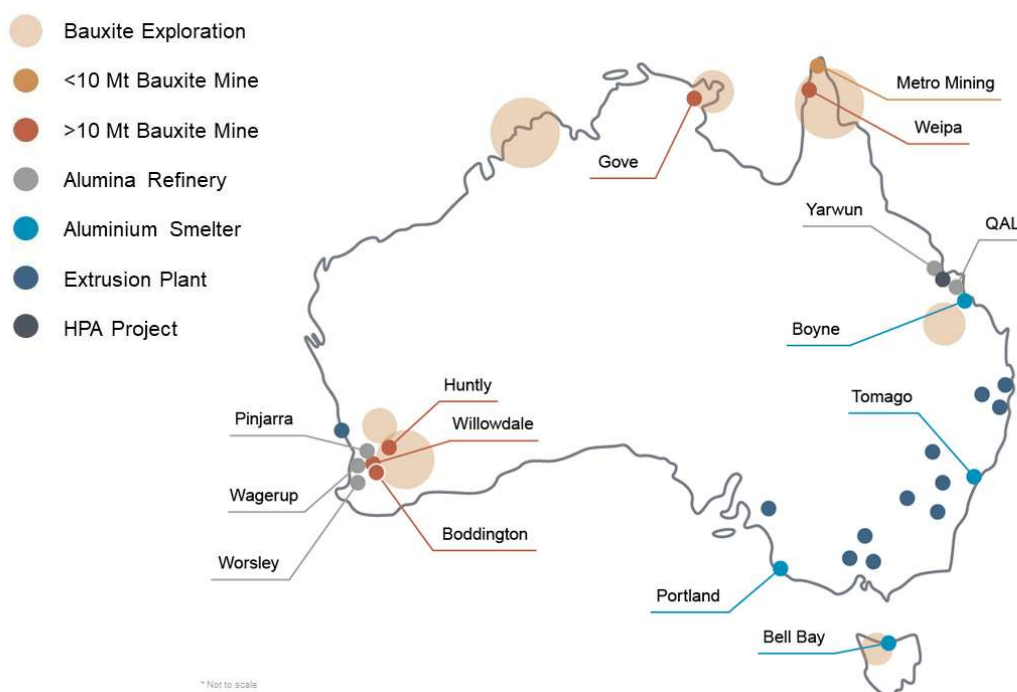


Figure 1. Aluminium Operations in Australia

**2. What feedback do you have on the proposed minimum requirements in Appendix A of the guidance document?**

**Community Benefit Principle 3.1** – The requirement outlines that the proponent should show how it has undertaken *early* engagement with stakeholders. While early engagement may be of relevance for new facilities, in the case of some of the Council’s Members they have been operating for many decades with many facilities operating for >40 years already. The Council believes that this wording needs to be updated to reflect early engagement for new facilities and ongoing engagement for existing facilities.

**Community Benefit Principle 4.1** – The requirement outlines a minimum target of 4 per cent Indigenous employment. ABS statistics<sup>3</sup> show that while 4% is consistent with the total percentage of Aboriginal and Torres Strait Islander people in the population that more than a third are under 15 years of age, with a median age of 24. This means at least a third the local Indigenous population in some areas may not be of working age and those in early career stage may be better suited to training programs than direct employment.

While in some regions, such as Cape York, bauxite mines can have indigenous participation rates of 30%<sup>4</sup> in other regions even 4 % may be unachievable. The Council believes that the minimum target should consider local demographics, including age, rather than being a one size fits all.

Additionally, in some regions, there may be a limited number of people within a particular demographic who aspire to work in these industries. This may mean multiple industries are competing for these same workers.

**3. What is an appropriate threshold amount for applying the threshold requirements and Future Made in Australia plans?**

Appendix D uses \$20 million as a possible cumulative threshold. The Council believes that this needs further testing to ensure this appropriately reflects potential project scale and administrative costs.

<sup>3</sup> <https://www.abs.gov.au/statistics/people/aboriginal-and-torres-strait-islander-peoples/estimates-aboriginal-and-torres-strait-islander-australians/30-june-2021>

<sup>4</sup> <https://www.metromining.com.au/media/33566/metro-investor-presentation-noosa-conference-nov-2022.pdf>