

<https://consult.dcceew.gov.au/draft-epbc-act-information-red-goshawk-erythrotriorchis-radiatus>

12 June 2026

Dear Minister;

Renewables Environmental Research Initiative / EPBC Act information for the Red Goshawk & Cockatoos

The Australian Aluminium Council (the Council) represents Australia’s bauxite mining, alumina refining, aluminium smelting and downstream processing industries. The Council and its members have been actively engaged in consultation on reforms to the *Environment Protection and Biodiversity Conservation (EPBC) Act*, as part of a broader suite of policy reforms needed to support the ongoing operation of Australia’s vertically integrated aluminium industry, including securing existing facilities and enabling future investment. Therefore, it is disappointing that while the industry has been focussed on the EPBC reform process, another major and intersecting reform has been running in parallel with little to no consultation with some of Australia’s most impacted industries.

The Council is concerned that while the *Renewables Environmental Research Initiative* (RERI) is intended to support the more efficient transition to onshore and offshore renewable energy; the consultation to date has not addressed the breadth of impacted industries nor the intersection with the current EPBC Act reforms. The RERI consultation process has been targeted at the renewable energy industryⁱ, while failing to acknowledge that the more than 200 species identified are not just marine species and migratory species, like seabirds, but also reptilesⁱⁱ and land birds which intersect with Australia’s resources and agriculture sectors. Indeed, much of the data has been derived from research undertaken by Australia’s bauxite mining industry – particularly from operations where bauxite miners are successfully protecting species of significance. The Council notes that the consultation is expected to commence in Q2 on Cockatoos including the Forest Red-tailed Black Cockatoo, Carnaby’s Black Cockatoo and Baudin’s Black Cockatoo where the range intersects with Western Australian bauxite mines. For example, the known and potential breeding range of the Red Goshawk and cockatoos of South Western Australia intersects with areas which produce enough bauxite to meet ~25% of the global aluminium production (Figure 1). Increased transparency and engagement with industry, as appropriate, will ensure the information reflects the latest research and information in a fair and balanced way.

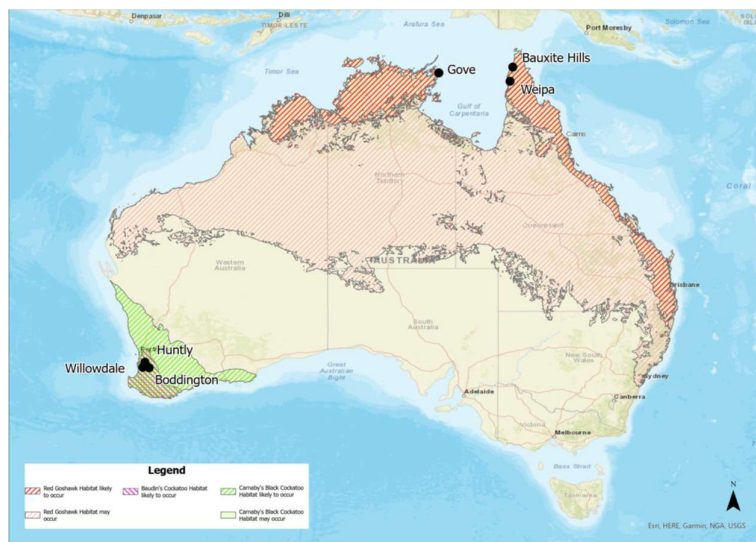


Figure 1. Intersection of Red Goshawk and Cockatoo ranges with Australia’s bauxite minesⁱⁱⁱ

The Council is unaware of any consultation with these land based activities which are vital to Australia's national economy. While consultation indicates that adhering to the information is *not mandatory*, proponents that do apply the information are likely to have a *smoother assessment* experience. Australia's aluminium industry is central to the nation's economic strength, industrial capability and long-term prosperity. It supports regional communities and skilled jobs, providing incomes for more than 75,000 Australian families, predominantly in regional Australia and contributes around \$18B a year to Australia's Gross Domestic Product. The industry's ability to continue to support this sovereign and industrial capability depends on reliable and competitive access to the bauxite that underpins the entire Australian aluminium value chain, as well as emerging critical minerals opportunities including, but not limited to, gallium, high-purity alumina and fluoride compounds. The foundational step in enabling this access is the environmental approvals process. Recent analysis undertaken for the Council found that delays in the approvals processes are forecast to be the single largest contributor to additional alumina refining costs over the next five years^{iv} - to remain internationally competitive Australia's mining and value adding industries need assessments in a manner which reflect both environmental protection but also commercial realities.

Decisions made now will shape Australia's role in global aluminium markets for decades. Globally, most bauxite is sourced from surface mines in tropical and sub-tropical regions. While maintaining high environmental, social and governance standards is essential, it is also important to recognise that global demand for bauxite and aluminium will continue to be met from alternative jurisdictions at an arguably lower environmental standard, if supply is not available from Australia. In reviewing the Paper "Draft EPBC Act information for the Red Goshawk" it is unclear as to how what is the legislative basis for the Paper and how it interacts with Matters of National Environmental Significance (MNES) and Offsets standards which have only recently undergone consultation. The linkage with existing recovery plan and other potential statutory conservation documents for red goshawk, Baudin's and Carnaby's black cockatoo, as provided for under EPBC reforms, is also unclear. The Council strongly encourages the Dept to release draft outputs from RERI project *Species research and guidance: Cockatoos* (delivered by Murdoch in Q2 2026) for public consultation to ensure all relevant information and data has been considered in the development of the draft outputs.

The Council is happy to discuss how the consultation processes to develop guidance on important species such as the Red Goshawk, Baudin's and Carnaby's Cockatoos can be improved so that all impacted sectors which are vital to Australia's economy have appropriate and adequate information, to ensure assessments provide both environmental protection and address commercial realities.

Kind regards,



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ⁱ <https://www.dcceew.gov.au/environment/epbc/advice/renewable-energy-projects/reri>

ⁱⁱ <https://consult.dcceew.gov.au/draft-epbc-act-information-for-the-grey-snake-hemiaspis-dameli>

ⁱⁱⁱ Data sourced from DCCEEW Protected Matters Search Tool

^{iv} <https://aluminium.org.au/wp-content/uploads/2024/10/241010-AAC-Upstream-Vulnerabilities-Report-FINAL.pdf>