

Department of Climate Change, Energy, Environment and Water (DCCEEW)

<https://consult.dcceew.gov.au/environment-protection-reform-consult-shaping-next-phase-environmental-reforms>

12 October 2026

Dear Minister

Re: Environment Protection Reform Consultation: Shaping the Next Phase of Environmental Reforms

The Australian Aluminium Council (the Council) is the peak industry association representing Australia's integrated bauxite, alumina and aluminium industry. We provide a unified voice across the value chain, working with governments, industry and communities to support a resilient, competitive and sustainable sector that underpins Australia's economic strength, industrial capability and energy transition. This value chain is strategically important to Australia's economic strength, regional communities, industrial capability and energy transition.

The Council welcomes the opportunity to provide a submission on Environment Protection Reform Consultation: Shaping the Next Phase of Environmental Reforms. The Council in principle supports the more detailed submissions of other mining related organisations which also represent the bauxite, alumina and aluminium sectors such as the Minerals Council of Australia and the Chamber of Mining and Energy WA. The Council will focus this submission on a single aspect of Consultation Paper 4 (the Paper) that related to radiological exposures.

The *Environment Protection Reform Act 2025* introduced amendments to Section 22(1A) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), providing an updated definition of a "radiological exposure action". This includes the addition of section 22(1A)(e), which captures the mining, processing, stockpiling or disposal of naturally occurring radioactive materials (NORMs). Projects that meet the definition of a radiological exposure action will trigger the EPBC Act and require a "whole-of-environment" assessment, including a detailed analysis of radiological impacts on the environment and the public.

The Council supports the proposed alignment of the EPBC Regulations with the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) framework. In particular, we welcome the clarification in the Paper that a project meeting the definition of a 'radiological exposure action' will require assessment and approval where it will have, will have or is likely to have a significant impact on the environment.

The Paper indicates that activity level and activity concentration thresholds will be used to determine whether an action is a 'radiological exposure action', while project- and site-specific considerations will inform whether that action is likely to have a significant impact on the environment and therefore require approval. It will be important that the final regulations and supporting guidance clearly distinguish these two steps.

1. Exceeding a prescribed radiological threshold should identify that an action falls within the radiological exposure action definition, but should not of itself be treated as establishing that the action is likely to have a significant impact on the environment.
2. The significance assessment should remain risk-based and capable of considering the actual circumstances of the proposed operation, reasonably foreseeable exposure pathways and relevant design and operational controls.

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 Department of Industry, Science and Resources has recently updated its forecastⁱ to earnings reflecting the geopolitical impacts on the sector, remaining at around \$19B in export revenue annually. More than \$14B of this comes from the alumina and aluminium industries, as value adding mineral processing sectors. The industry directly employs more than 21,000 people, including 6,600 full time equivalent contractors. It also indirectly supports a further 55,000 families predominantly in regional Australia. The integrated industry contributes around \$18 B to Australia's GDP.

The Council and its members would be concerned if conservative screening criteria were to be applied as regulatory thresholds, without a subsequent significance assessment, and that this may undermine the ongoing operation of this integrated value chain. We believe that a risk-based approach would deliver the same human health and environmental outcomes while ensuring that regulatory effort is directed towards genuinely significant radiological risks.

We would be pleased to discuss any of the issues raised in this submission.

Kind regards,



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About the Aluminium Industry

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 alumina refineries producing around 17 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.

ⁱ <https://www.industry.gov.au/sites/default/files/2026-07/resources-and-energy-quarterly-june-2026.pdf>