

14 October 2026

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Deputy Secretary  
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Dear Deputy Secretary

### Consultation: Restoration Contributions Calculator

The Chamber of Commerce and Industry of Western Australia (CCIWA) is the peak body advancing trade and commerce in Western Australia, representing businesses of all sizes across the breadth of the economy.

Thank you for the opportunity to provide comment on the Restoration Contributions Calculator (the calculator), following from previous engagement with the Department and Frontier Economics during 2024. The calculator is a key part of the implementation of reforms to the Environmental Protection and Biodiversity Conservation Act (EPBC Act).

Given the importance of the calculator, we strongly recommend that it is revised and that further consultation occurs with industry over the next few months. Our members advise that in its current form, the calculator results in a quantum of restoration obligations and associated costs that are very problematic, excessive, and may result in projects being unable to proceed.

Specific feedback in relation to the calculator includes:

- **Addressing previous feedback:** CCIWA, other peaks, and our respective members all provided significant feedback to the 2024 Frontier Economics draft, and these matters have not been addressed in the current version. We reiterate that the following matters must be reconsidered to deliver a realistic calculator:
  - **The remoteness factor** – this presents a serious risk to regional development, and should be removed or mitigated. Remoteness multipliers will only drive up costs for housing and job-generating projects in the resources, energy and agricultural sectors across regional WA.
  - **Administrative costs** – these are high and remain unjustified.
  - **Climate change matters** – these will influence cost, but there is a lack of guidance on how to account for or discount the influence of climate change.
- **Calculator methodology:** previous iterations of the draft calculator clearly highlighted how the methodology had changed, factors for proponents and decision-makers to consider, and other matters. CCIWA supports further guidance being shared, with industry engagement. Members have highlighted that the current methodology does not detail several matters. In particular, it is not clear how:
  - **Species-specific factors**, such as conservation status, landscape and habitat, and frequency of sighting/habitat use, are incorporated into costs. Advice is needed, and this should extend to marine and freshwater habitats.
  - **Land value assumptions** including investment earnings or depreciation, valuation methodologies or the treatment of existing conservation tenure will be considered.

- **Indigenous protected areas** will be valued.
- **Abatement models** are considered where one form of abatement may be shared across sites or species.
- **To minimise the risk of double counting costs.**
- **Reversal risk and contingency costs:** based on the two case studies provided, costs appear excessive and would create an offset market that risks increasing all offset costs. CCIWA suggests that the Department publishes further guidance on how reversal risk was calculated, and undertakes further consultation with industry.
- **Additional scenarios:** members have suggested that additional scenarios could help to identify cost barriers, opportunities, and ways to deliver intended outcomes and meet legislative goals. The three suggested scenarios are:
  - applying the calculator at a regional scale;
  - specific mining and housing examples; and
  - use of existing offset regimes, in part or in full, where a mixed compensation pathway may provide a positive restoration outcome. This may apply to sequential mining operations, for example.
- **Governance matters:** the calculator could be supported by the Department providing further guidance and information relating to risk and governance, such as how existing offset schemes will be considered against the calculator framework. CCIWA also recommends that further guidance is provided on how unused contingency and administrative costs are managed. This should be supplemented by ongoing reporting, to ensure that the considerable cost-recovery funding raised from industry results in improved approvals performance.
- **Other matters:** The ‘unacceptable uncertainty’ description would benefit from clearer criteria. Previous iterations of the calculator also suggested a review at least every five years, with administrative costs reviewed annually. We welcome a move to review the methodology every five years as part of any statutory review, with an initial two-year review, but urge for administrative costs to be clarified in advance. We also suggest that a working model calculator should be made available for free to enable the public and proponents to test and use for modelling.

To deliver on the EPBC Act reforms, it is critical that all regulations and supporting policy are workable, realistic and concise. Further amendments to clarify intent, support certainty for existing projects and approvals, and simplify processes are required to ensure that this can fulsomely occur.

Should you wish to discuss the content of this letter further, please do not hesitate to contact Andrew Dolling, Manager Policy, via

Yours sincerely

Dr Daniel Kiely  
**Chief Economist**