Australian Government
Productivity Commission

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Business reporting requirements

Call for submissions

The PC has released this paper to assist individuals and organisations to prepare submissions. It contains and outlines:

- the scope of the inquiry
- the PC's procedures
- matters about which the PC is seeking comment and information
- how to make a submission.

September 2026

Acknowledgment of Country

The Productivity Commission acknowledges the Traditional Owners of Country throughout Australia and their continuing connection to land, waters and community. We pay our respects to their Cultures, Country and Elders past and present.

About us

The PC is the Australian Government's independent research and advisory body on a range of economic, social and environmental issues affecting the welfare of Australians. Its role, expressed most simply, is to help governments make better policies, in the long-term interest of the Australian community.

The PC's independence is underpinned by an Act of Parliament. Its processes and outputs are open to public scrutiny and are driven by concern for the wellbeing of the community as a whole.

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Call for submissions

The PC has released this paper to assist individuals and organisations to prepare submissions to the inquiry. It contains and outlines:

- the scope of the inquiry
- the PC's procedures
- matters about which the PC is seeking comment and information
- how to make a submission.

Participants should not feel that they are restricted to comment only on matters raised in the paper. The PC wishes to receive information and comment on issues which participants consider relevant to the inquiry's terms of reference.

Key dates

Receipt of terms of reference	24 August 2026
Due date for submissions	30 September 2026
Release of interim report	November 2026
Final report to Government	24 February 2027

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Improving non-financial business reporting requirements

What this inquiry is about

The Australian Government has asked the Productivity Commission to undertake an inquiry into opportunities to improve the efficiency and value of non-financial business reporting requirements.

Reporting requirements compel businesses to provide transparency about their operations and performance and the risks and opportunities they face. This transparency assists investors, lenders and consumers (including other businesses) to make informed decisions about which businesses they engage with and on what terms. This can ultimately drive behaviour change in businesses. It also assists regulators to monitor the risks they seek to mitigate.

But reporting requirements also impose costs on reporting businesses, and sometimes on the businesses that work with them. Costs can include the time required to understand reporting obligations, establish reporting systems, collect and maintain information, prepare and submit reports, and demonstrate compliance to regulators. Where businesses face many reporting requirements, the requirements can impact operations and dynamism in ways not captured when they are assessed individually, changing the balance of benefits and costs.

The terms of reference ask the PC to identify 'pain points' and ways in which the objectives of reporting could be achieved more efficiently – changes that would better balance the costs and benefits of reporting.

How could reporting burdens be reduced?

There are opportunities to reduce regulatory burdens by reducing the compliance costs imposed on businesses while retaining reporting requirements. For example, by:

- increasing the thresholds that trigger reporting requirements so that fewer businesses need to report
- altering what businesses need to report or the degree of assurance required
- simplifying or providing flexibility in the format in which the reporting occurs
- reducing the frequency of reporting
- gathering the data from an alternative source; for example, via better information sharing between agencies.

Changes along these lines can involve trade-offs between reducing costs for businesses and reducing the transparency and oversight that the reporting supports.

A more fundamental change would be to substantially change a requirement, which could be justified if policy objectives are better met through a different form of policy intervention.

Interactions between reporting requirements and the cumulative effects of multiple requirements might impose additional burdens but also provide opportunities to achieve objectives more efficiently. For example, by:

- harmonising definitions across different reporting requirements
- regulators sharing more data between themselves to facilitate a 'tell us once' approach.

Any proposals for change would need to be mindful of transition costs for business and the Australian Government, as systems and processes have been developed to meet the existing requirements.

What this inquiry will focus on

The terms of reference direct the PC to not consider financial reporting or continuous disclosure obligations under the *Corporations Act 2001* (Cth). This is because the Council of Financial Regulators and other financial sector regulators are considering these reporting requirements as part of their *Better regulation roadmap* (CFS 2026). The terms of reference also direct the PC to not make recommendations that are specific to the *Modern Slavery Act 2018* (Cth).

Despite these exclusions, there are still many non-financial reporting requirements that remain in-scope for this inquiry.

- Some focus primarily on providing information to consumers (such as payment times reporting), investors and lenders (such as sustainability reporting) or regulators (such as critical infrastructure risk management reporting).
- Some are recurring obligations (such as workplace gender equality reporting), while others are triggered by events (such as consumer product recall notifications).
- Some are industry-specific (such as telecommunications annual disclosure reporting), while others are economy-wide (such as data breach notifications).
- Some are Australian Government requirements (such as national greenhouse and energy reporting), while others are state and territory requirements (such as labour-hire reporting in some states) or non-government requirements (such as the corporate governance reporting required of firms listed on the Australian Stock Exchange).

The PC will take a two-pronged approach to this inquiry that reflects that improvements might come from examining both individual reporting requirements and cumulative impact of reporting requirements. The PC will both:

- analyse key non-financial reporting requirements. A preliminary scan has revealed three categories of non-financial reporting requirements that may warrant examination – payment times reporting, sustainability and environmental reporting and workplace gender equality reporting. While some aspects of these requirements are subject to current or upcoming reviews, it is not our intention to create unnecessary uncertainty by duplicating or pre-empting these processes. These were identified because they apply to a relatively large number of businesses from a wide range of industries and require regular and ongoing reporting. We would welcome participants' suggestions for additional or alternative areas of focus.
- investigate interactions between requirements and consider the cumulative burden of multiple requirements on business. This might involve mapping the broader reporting landscape to identify significant interactions between requirements to guide future simplification efforts and investigating common barriers that prevent regulators from achieving 'tell us once'.

Both tasks will rely on businesses that face reporting requirements providing quantitative evidence and worked examples that illustrate issues for the PC to explore. The information requests that follow set out how participants can most effectively contribute at this stage of the inquiry process.

Key reporting requirements

Payment times reporting

The Payment Times Reporting Scheme requires large businesses to report every six months on payment terms, times and practices in relation to their small business suppliers. Reports are published on the Payment Times Reports Register. The intent of the scheme is to encourage improved payment practices through transparency and reputation pressure.

An independent statutory review noted while the reporting scheme had merit, it was not functioning well (Emerson 2023, pp. 26–51). It concluded that some requirements imposed unnecessary regulatory burdens and limited the accuracy, accessibility and usefulness of reported data.

In response, the Australian Government changed the scheme to consolidate group reporting, simplify reporting requirements, strengthen the regulator's powers and improve the transparency and use of reported information (Explanatory Memorandum, Payment Times Reporting Amendment Bill 2024).

Participants to the 2023 review proposed other ways to reduce reporting costs, including annual rather than six-monthly reporting, changes to report sign-off requirements, and integrating the scheme's Small Business Identification Tool with business systems and existing Australian Government data sources (for example, ACCI 2023, p. 5; ASBFEO 2023, pp. 1, 3–4; BCA 2023, pp. 8–9; CA ANZ 2023, pp. 1, 3–4).

A further review of the Act is due to be completed between September 2027 and September 2029.

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Information request 1 – Payment times reporting

What are the main costs associated with complying with the reporting requirements, including any upfront implementation costs and ongoing reporting costs?

What changes to reporting requirements, reporting processes and mechanisms could reduce compliance and reporting costs and data duplication? For example, changes to reporting frequency or systems integration to enable reuse of existing government data.

To what extent is reported information used by stakeholders, and what effects has its availability had on their decisions, activities or outcomes?

- Where payment time and terms have become more favourable to small businesses, have there been offsetting reductions in the prices paid to them?

Please provide worked examples and evidence to support your responses.

Sustainability and environmental reporting

Some large businesses must report on their sustainability and environmental impacts. There are several different reporting requirements, including climate-related financial disclosures (sustainability reporting), emissions reporting, and pollution reporting requirements. Sustainability and environmental reporting requirements support a variety of different policy objectives including implementation of emissions reduction policies, informed decision-making for policymakers and investors, and minimising environmental harm. Some schemes impose overlapping reporting requirements.

While much of this reporting is long-standing, sustainability reporting is being phased in over several years. Larger corporations and those with more emissions started 1 January 2025, other groups started 1 July 2026, and the final phase will commence 1 July 2027 (ASIC 2026). In the 2026–27 budget, the Australian Government announced increases to the thresholds that trigger the requirement so that fewer businesses would need to report (Australian Government 2026).

The Treasury is currently consulting on ways to reduce the burden of sustainability reporting, including changing assurance rules, providing clearer guidance and reducing the burden of information requests across supply chains. The reporting regime is also legislated to be reviewed in 2028 (Treasury 2026, p. 7).

This inquiry is interested in the cumulative costs of sustainability and environmental reporting, opportunities to improve its efficacy, and how the newly introduced requirements fit together with existing reporting. The PC is also interested in feedback on ways to better balance the benefits of reporting and the burden they impose.

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Information request 2 – Sustainability and environmental reporting

What are the main costs associated with complying with the reporting requirements, including any upfront implementation costs and ongoing reporting costs?

- Are these costs exacerbated because of overlapping requirements?

What changes to reporting requirements, reporting processes and mechanisms could reduce compliance and reporting costs and data duplication? For example, changes to reporting frequency or systems integration to enable reuse of existing government data.

To what extent is reported information used by stakeholders, and what effects has its availability had on their decisions, activities or outcomes?

Please provide worked examples and evidence to support your responses.

Workplace gender equality reporting

Businesses with 100 or more employees are required to annually report data relating to 6 gender equality indicators to the Workplace Gender Equality Agency (WGEA): workforce gender composition, governing bodies, flexible work and caring responsibilities, consultation on gender equality, and sex-based harassment and discrimination.

The regulatory framework has recently extended beyond just reporting. Starting from 2026, businesses with 500 or more employees must also meet or demonstrate improvement on 3 gender equality targets which they choose from a list of 19 options (WGEA 2026). Non-compliant businesses are publicly named by WGEA and may become ineligible for Australian Government grants, financial assistance or contracts (*Workplace Gender Equality Act 2012* (Cth)).

The Australian Government made changes to the scheme in 2024 aimed at reducing reporting burdens following a 2021 review. This included removing the requirement to report specific items and increasing investment in digital solutions to assist employers (PM&C 2021, pp. 12–14). This inquiry is interested in whether and how there is further scope to improve these processes, such as by making additional use of administrative data sources.

The review also suggested that there may be a case in the future for extending the reporting requirement to businesses with fewer than 100 employees (PM&C 2021, p. 31). This inquiry is interested in the effectiveness of the WGEA reporting in increasing gender equality and the experiences of smaller reporting businesses (those with 100 to 500 employees) to understand the merits of WGEA reporting for smaller businesses and investigate the potential costs and benefits of expansion.

Information request 3 – Workplace gender equality reporting

What are the main costs associated with complying with the reporting requirements, including any upfront implementation costs and ongoing reporting costs?

What changes to WGEA or other reporting requirements, reporting processes, or mechanisms (such as Single Touch Payroll) could reduce compliance and reporting costs and duplication? For example, changes to reporting frequency or systems integration to enable reuse of existing government data.

To what extent is reported information used by stakeholders, and what effects has its availability had on their decisions, activities or outcomes? For example, have you increased your awareness of or willingness to adopt policies and practices to increase workforce gender equality?

- Has WGEA reporting made an impact on the practices for smaller reporting businesses?
- What other tools could be used to increase gender equality in the workforce? Are these preferable to WGEA reporting, and why?
- To what extent do existing penalties for non-compliance provide incentives for organisations to action on gender equality?

Please provide worked examples and evidence to support your responses.

Other reporting requirements

We would welcome participants' views on other potential areas of focus – additional or alternative non-financial reporting requirements that impose significant costs or where the objectives of reporting could be achieved more efficiently.

Information request 4 – Other non-financial reporting requirements

Do any reporting requirements other than payment times reporting, sustainability and environmental reporting and workplace gender equality reporting that warrant particular attention by this inquiry?

- What are the main upfront and ongoing compliance costs of these other requirements?
- What changes to reporting requirements, processes or mechanisms could reduce costs and data duplication?
- How is the reported information used by stakeholders, and how does it affect their decisions, activities or outcomes?

Please provide worked examples and evidence to support your responses.

Cumulative impacts of reporting requirements

Where businesses face multiple reporting requirements, the cumulative burden of the requirements can exceed the sum of the individual burdens in isolation. Multiple requirements might come to occupy a substantial share of time and attention at the executive and board level, limiting businesses' ability to focus on strategy and growth. Or, if participation in a market triggers multiple reporting requirements, a business may decide against entering even if any one of the requirements alone would be insufficient to dissuade it.

In other cases, the cumulative burden of multiple requirements might be less than the sum of the individual burdens but still unnecessarily high. For example, if businesses provide the same information to multiple regulators, the same regulatory outcome could be achieved at lower cost via a 'tell us once' approach supported by data-sharing. Or if businesses are required to provide similar but slightly different information to different regulators without a clear rationale, the same regulatory outcome could be achieved at lower cost by harmonising the requests.

The PC will map the reporting requirements landscape to identify significant interactions between reporting requirements and instances where businesses face very high volumes of reporting.

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Information request 5 – Significant interactions between reporting requirements

Which types of interactions between non-financial reporting requirements are most prevalent and burdensome for businesses to navigate? For example:

- obligations to report identical data or information to different reporting bodies
- obligations to report very similar data or information to different reporting bodies
- inconsistent definitions, thresholds or classifications that make it unclear which requirements do and do not need to be reported against
- inconsistencies in which entity within a corporate group needs to report (for example, some reporting requirements attaching to subsidiaries and others to parents)
- misaligned reporting periods
- aligned reporting periods
- simultaneous changes to multiple reporting requirements?

Please provide specific examples of these interactions and evidence of how prevalent and burdensome they are.

For which types of businesses (if any) have reporting burdens become especially large, and what is the contribution of non-financial reporting requirements to this? Which sources of data or forms of analysis could best answer these questions?

What evidence is there of step changes in reporting burdens over time that could indicate the effects of particular requirements being introduced?

The PC is interested in ways to resolve these issues. Some might be interaction-specific, such as harmonising definitions of information required by multiple regulators. Others might be more general, such as addressing common barriers to regulators sharing data to facilitate a 'tell us once' approach. If the issue is that the sheer volume of requirements facing some businesses is inhibiting growth and dynamism, there may be a case for a more fundamental resetting of regulatory requirements in that area.

The PC is also interested in whether existing regulatory transparency and accountability measures are effective at preventing negative interactions between reporting requirements from emerging. This includes:

- the requirement that an impact analysis be undertaken for sufficiently material new reporting requirements
- the Regulatory Policy, Practice & Performance Framework (Department of Finance 2025), which provides guidance to regulators and policymakers on effective regulation.

Information request 6 – Ways of ameliaorating negative interactions between reporting requirements

How could burdens arising from interactions between reporting requirements be reduced? What successful examples of this are there in Australia or abroad?

What barriers are there to regulators sharing data to facilitate a 'tell us once' approach? For example, legal or information technology barriers.

Would common reporting platforms or data standards reduce reporting burdens? If so, what are the barriers to greater adoption of these?

Are existing instruments of regulatory policy – such as impact analysis requirements and the Regulatory Policy, Practice & Performance Framework – effective at preventing negative interactions between reporting requirements from emerging? How could they be improved?

Have your say

This inquiry will be informed by public engagement, including submissions. We will release an interim report in November 2026 for public comment.

We invite interested people and organisations to make a **written submission** or a **brief comment**. In preparing your submission or making your comment, please consider the terms of reference (attachment A) and our proposed areas of focus.

There is no minimum length requirement – your submission could be a short statement relating to one or a few topics or a much more substantial document covering a range of issues.

We will have regard to submissions made to previous relevant inquiries. You are welcome to include your previous submissions as attachments if you wish, but there is no requirement to do so.

You are encouraged to identify issues within the scope of the terms of reference and provide suggestions for ways forward. You are also encouraged to provide evidence to support your views where possible, such as relevant data, case studies, research reports and other documentation. Provision of quantitative evidence and worked examples that illustrate issues for the PC to explore is particularly helpful.

Submissions and brief comments are requested by **30 September 2026**. Further information on the inquiry and how to participate is available at www.pc.gov.au/inquiries-and-research/business-reporting.

We will also draw on the significant body of recent and current work on issues around non-financial reporting, including the concurrent PC inquiry into business dynamism.

A. Terms of reference

I, the Hon Jim Chalmers MP, Treasurer, pursuant to Parts 2 and 3 of the *Productivity Commission Act 1998*, hereby request that the Productivity Commission (the Commission) undertake an inquiry into opportunities to improve the efficiency and value of non-financial business reporting requirements in Australia.

Background

As part of its productivity agenda, the Government is taking significant steps to reduce unnecessary regulatory costs for businesses in Australia, including through commissioning deep dives into areas where there may be scope to improve the efficiency of existing regulation and reporting requirements. Non-financial business reporting has been identified as an area for review.

Business reporting provides a strong foundation for a competitive economy, providing transparency around performance, risks and opportunities. Non-financial reporting is designed to make information about the operations of businesses available to stakeholders including on matters such as environmental, social and governance performance. Providing visibility of these non-financial matters enables investment to be directed towards businesses that align with the interests of stakeholders and are managing risks holistically.

Non-financial reporting requirements have been established through a range of Commonwealth laws and regulatory instruments, including corporations and taxation legislation, workplace laws, reporting standards, and environmental legislation. These are administered by multiple regulators including the Australian Securities and Investments Commission, the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Competition and Consumer Commission, the Department of Climate Change, Energy, the Environment and Water, the Attorney-General's Department, and others.

Australia's reporting requirements have generally been designed to align with international best practice. As requirements have evolved over time and have generally been designed independently, this inquiry will allow an opportunity to assess the cumulative cost of reporting obligations on Australian businesses overall.

This review complements the Council of Financial Regulators (CFR), who are working together with other financial sector regulators (CFR Plus) to deliver better regulation of the financial sector through its Better Regulation Roadmap. This inquiry will therefore not consider financial reporting or continuous disclosure obligations under the *Corporations Act 2001*. It also complements consultation in train regarding reforms to modern slavery requirements, so will not make recommendations that are specific to the *Modern Slavery Act 2018*.

Scope of the inquiry

This inquiry tasks the Commission to analyse non-financial business reporting requirements to identify significant regulatory pain points and instances where the objectives of this reporting could be achieved more efficiently.

The purpose of this deep dive is to provide insights about how each set of reporting requirements unfold in practice, including interaction between different reporting requirements. The Commission should also consider the timing of reporting requirements including for regular reporting and reporting that is irregular or event-based.

The Commission should consider where there is scope for efficiencies in collection or reporting of data, such as a 'tell us once' approach. The Commission should also consider the effect of any potential increase in cost that might arise from changing established reporting arrangements.

In undertaking this analysis, the Commission should consider the balance between reducing regulatory cost of non-financial reporting obligations on different industries and firm sizes.

The Commission should consider the value of the data collected through reporting, including consideration of:

- the frequency of reporting and interaction with financial reporting requirements
- differences in data definitions and opportunities to create consistency
- thresholds for reporting requirements
- state and territory reporting requirements
- legal obligations
- international best practices

The Commission should consider the value of the data reported to different stakeholders, including workers, directors, investors and broader stakeholder groups and uses such as insolvency practitioners and government schemes.

The findings from this inquiry will inform further work to improve the utility of non-financial reporting and streamline reporting requirements where possible.

Process

The Commission should undertake wide consultation, including inviting public submissions, consulting with relevant community stakeholders and Commonwealth regulators, and engaging with state and territory governments as required.

The Commission should also have regard to other regulatory reform work in this space to avoid the duplication of efforts, including in particular recent or concurrent reviews of regulatory regimes, international standards and developments, and recent and proposed Government reforms and modernisation initiatives. The Commission should also have regard to any upcoming legislative reviews to avoid duplication or pre-empting established review processes and creating unnecessary uncertainty for stakeholders.

The Commission should provide a final report to government within 6 months of the receipt of this terms of reference.

The Hon Jim Chalmers MP
Treasurer

[Received 24 August 2026]

References

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