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### **DRAFT GREENHOUSE GAS EMISSION GUIDELINE**

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments to the Department of Environment, Science and Innovation on the Draft Greenhouse Gas Emission Guideline.

CCAA is the peak industry body for cement manufacturers, concrete suppliers and extractive operators throughout Australia. Collectively known as the heavy construction materials industry, CCAA members operate cement manufacturing and distribution facilities, concrete batching plants, hard rock quarries and sand and gravel extraction operations throughout the nation to meet Australia's building and construction needs. These businesses are made up of the majority of material producers and suppliers ranging from large global companies to SMEs and family operated businesses.

Heavy construction materials are vital to delivering the infrastructure required to support Australia's built economy which underpins the development of our nation's physical infrastructure, generating approximately \$15 Billion in annual revenue and employing 30,000 Australians directly and a further 80,000 indirectly.

#### **General Comments**

The Australian Cement and Concrete industry recognise the challenges of climate change and the industry remains committed to work towards decarbonisation throughout the value chain, with a strong emphasis on technological, regulatory, structural, and behavioural change. In 2021, the industry declared its ambition to deliver net zero carbon cement and concrete to Australian society by 2050.

CCAA, in partnership with the Cement Industry Federation commissioned VDZ, a consultancy with concrete expertise, to provide a report on the pathways for the Australian cement and concrete sector to decarbonise in late 2021. The report can be read on the [CCAA Website](#).

The VDZ report enables a better understanding of the technologies and practices necessary to decarbonise Australian cement and concrete and identifies eight decarbonisation pathways. A key aspect of achieving these aims is a standard data measurement process and sharing with stakeholders. This Guide should help to achieve this aim and support ESG credentials through a consistent approach for reporting and managing greenhouse gas emissions.

However, CCAA has significant concerns regarding specific aspects of the Guide and provides the following more detailed comments:

### **Section 3 Application Requirements**

CCAA remains concerned that implementing this Guide will introduce another layer of unnecessary red tape to the industry. At the very least, any reporting requirements as per Table 4 should align with requirements already in place and where applicable e.g. Commonwealth NPI, NGERs reporting, and not introduce another format which will create unnecessary duplication of effort for industry.

The current Guide is essentially another level of reporting of similar information that will be reported to the Commonwealth. Given the magnitude and nature of the potential climate change impacts, reporting to the Commonwealth is most appropriate. To duplicate this reporting and impact assessment requirement at a state level is unnecessary when the data can be derived from Commonwealth information.

#### **3.1.2 Background greenhouse gas emissions**

The requirement to calculate background greenhouse gas emissions of 'nearby activities' or sources that are not resulted from the project is unreasonable and impractical given that neighbouring sites emissions would be commercial in confidence. Trying to estimate these emissions without validated data would lead to false results, disputes with neighbours and negative reporting outcomes for DESI.

#### **3.2 Determination of project emission category**

The requirement for Low Emitters to report on Scope 3 carbon emissions will be an unreasonable onerous cost on small business which will affect the viability of these businesses and is not supported.

### **Section 3.4 Risks and likely magnitude of impacts to environmental values**

The Guide states that "... it is difficult to determine the likelihood and magnitude of impacts to environmental values from an individual project's GHG emissions...". CCAA agrees that it will be extremely difficult to calculate the potential impact from an individual project on the greenhouse gas level in the atmosphere, and then correlated to a potential impact on a Queensland environmental value due to that particular project. Such impacts are likely to be intangible.

Given these data and scientific uncertainties, CCAA remains concerned that the assessment of potential impacts from a specific project will be subjective with the potential to be misused by opponents of projects to highlight that there is a negative impact to the environment, when in fact that is not necessarily the case.

CCAA also remains concerned that this additional red tape will discourage operations from seeking amendments to an existing environmental authority that will potentially deliver other beneficial environmental outcomes, risking further investment into Queensland.

Queensland's regulatory environment needs to be internationally competitive to continue to attract capital to invest into Queensland to ensure a sustainable and competitive heavy construction materials industry. This in turn facilitates Queensland's improved productivity, housing affordability and lower infrastructure costs.

Yours sincerely,



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