

19 August 2024

Waste Strategy Review  
Department of Water and Environmental Regulation  
Locked Bag 10  
Joondalup DC WA 6919

Via email: [wastestrategyreview@dwer.wa.gov.au](mailto:wastestrategyreview@dwer.wa.gov.au)

**SUBJECT: REVIEW OF WASTE AVOIDANCE AND RESOURCE RECOVERY STRATEGY 2030**

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments to the Department of Water and Environmental Regulation (DWER) on the review of the Waste Avoidance and Resource Recovery Strategy 2030 - Consultation draft May 2024 (Waste Strategy Review).

CCAA is the voice of the heavy construction materials industry in Australia. Our members operate cement manufacturing and distribution facilities, concrete batching plants, hard rock quarries, and sand/gravel extraction operations throughout the nation. The CCAA membership produces the majority of Australia's cement, concrete & aggregates, and ranges from large global companies to SMEs and family operated businesses.

CCAA provides key recommendations for enhancing the Waste Strategy 2030, with a focus on improving data accuracy and advancing the circular economy in transport infrastructure. CCAA urges DWER to provide timely and up-to-date data for tracking progress toward the Strategy's targets, noting that current data is outdated. CCAA recommends benchmarking WA's targets against those of other states to identify best practices. CCAA also supports increasing recycled content use in regional areas where it is cost-effective, considering factors like transportation and material sourcing.

In the transport infrastructure sector, CCAA highlights the need for stronger incentives for waste reduction, reuse, and recycling in government procurement, drawing attention to the success of Victoria's Recycled First policy. CCAA endorses the general direction of the draft Transport Portfolio Sustainability First policy, which emphasises early design-phase planning for reuse and recycling. CCAA strongly supports the need for fit-for-purpose technical standards and commercial models. CCAA also supports accelerating the implementation of the Recovered Materials Framework to allow for the use of priority materials before the full framework is enacted in 2027.

More details on these aspects are provided in Appendix 1.

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

For further information please contact Roger Buckley, State Director Western Australia on Mobile: 0417 401797 or Email: [roger.buckley@ccaa.com.au](mailto:roger.buckley@ccaa.com.au).

Yours sincerely

MICHAEL KILGARIFF  
Chief Executive Officer

## APPENDIX 1

### DETAILED COMMENTS ON THE REVIEW OF WASTE AVOIDANCE AND RESOURCE RECOVERY STRATEGY 2030

#### Targets

- DWER should be able to provide up-to-date and timely data to track progress on whether the Strategy's targets are being met or not. The provision of 2021-22 data to support the Waste Strategy Review is several years out of date. More timely provision of data needs to be provided.
- The Waste Strategy Review should also provide a comparison of WA targets to interstate targets and how the various jurisdictions are progressing to meet those targets and hence identify best practice in those jurisdictions with high recycling rates and low generation rates. Such best practice should be clearly identified and incorporated within the Waste Strategy Review.

#### Priority 1 – Better outcomes for regional and Aboriginal communities

- CCAA supports the increased use of recycled content in regional areas, where it is practical, fit for purpose and cost effective compared to virgin materials. The cost of transport and distance from source of materials to market is a key consideration in deciding between using recycled versus virgin quarry materials.

#### Priority 4: Realising the economic potential of recycling

##### Transport Infrastructure

- CCAA supports the reuse and recycling of materials in State Government procurement as promoted through the *Roads to Reuse* program and the Waste Authority's C&D Rollout Plan. But more can be done in the transport infrastructure space. Victoria's infrastructure projects have used 3.4 million tonnes of recycled material, more than 17 times the amount of material used in Western Australia's *Roads to Reuse* program.
- Waste reduction, reuse and recycling are not specifically incentivised or targeted commercially by Main Roads WA (MRWA) or Public Transport Authority (PTA).
- The Westport program could be a significant driver for change with innovative, recycled products incorporated into the various projects, including the early works upgrading Anketell Road.
- Wins in reduction, reuse and recycling are often not sought until project delivery commences (sometimes due to lack of a clear pathway for approval), which in most cases is too late for MRWA or PTA to properly consider and approve.
- CCAA supports the general direction of the draft whole of Transport Portfolio Sustainability First policy. This is an attempt of a top-down approach developed after wide consultation to implement a transport portfolio wide circular economy policy which prioritises the reduction, reuse and recycling of materials (similar to Victoria's [Recycled First](#) policy) as well as decarbonising infrastructure projects. This includes the aim to reduce, reuse and recycle in the early design phase of infrastructure projects to ensure there is sufficient time to obtain the required approvals to achieve the set aims.
- The Sustainability First policy also includes a Knowledge Hub which aims to be a tool available across the supply chain to share knowledge, case studies and learnings from applying new low carbon, circular materials in transport infrastructure, operations and maintenance contracts.

- There is also a need for a forum to actively engage suppliers of innovative products, and bringing together suppliers and customers.
- Existing specifications and technical standards are highly prescriptive and do not allow for the use of non-standard materials. An effective circular economy will only be delivered by appropriate fit-for-purpose technical standards and commercial models.
- CCAA supports the proposed Roadmap Actions 4.1.
- Additional Roadmap actions to enable Waste Strategy targets to be achieved should include:
  - Actively develop fit-for-purpose technical standards and commercial models in consultation with industry that facilitate the expanded use of reused/recycled materials.
  - Optimise the reuse of materials over the transport project's life through the expanded use of the Office of Major Transport Infrastructure Delivery's (OMTID's) new *Material Exchange* platform.
  - Stronger Government support for innovation and research & development that creates new markets and business opportunities for reused/recycled materials.

### **Recovered Materials Framework**

- CCAA welcomes the opportunity to be part of the DWER Recovered Materials Framework - Stakeholder Reference Group (SRG). Initiating a practical Framework is an important aspect to realising the broader economic benefit of the circular economy in WA.
- CCAA supports the industry consultation process for the Pilot Recovered Material Declarations (RMDs), using Australian Standards, specifications and interstate models where possible, for priority materials prior to the legislation being enacted in 2027.
- CCAA supports the priority materials to be included in this process including C&D material, fly ash, Incinerator bottom ash aggregate and Lithium mining waste (aluminosilicate and delithiated beta spodumene). These need to be included in the Priority 3 materials.
- The SRG has been advised that the Framework will not legally commence until the end of 2027. This is too long to wait.
- CCAA supports the proposal for Interim Declarations for the priority materials to be used in real-world applications before the Recovered Materials Framework is established in 2027. This will provide businesses with regulatory certainty and facilitate a smoother transition for WA's circular economy. Lessons learnt from the development and implementation of the Interim Declarations will inform development of legislative amendments to the *Environmental Protection Act 1986* and formulation of associated regulations.