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**SUBJECT: DRAFT TRANSPORT PORTFOLIO SUSTAINABLE FIRST POLICY**

Cement Concrete & Aggregates Australia (CCA) welcomes the opportunity to provide comments to the Department of Transport (DoT) on the draft Transport Portfolio Sustainable First Policy – Carbon and Materials.

CCA 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 CCA membership produces the majority of Australia's cement, concrete & aggregates, and ranges from large global companies to SMEs and family operated businesses.

CCA supports many of the aspects included in the Sustainable First Policy, specifically around implementing lifecycle assessments, aligning with national climate targets, and the need for low-carbon materials in infrastructure projects. CCA also supports the DoT approach to a whole-of-life carbon management and of integrating sustainability into project planning, design, and execution. CCA and DoT also have a shared focus on material efficiency, sustainable procurement, and lifecycle analysis underscoring a common objective of minimising the carbon footprint in the transport sector.

CCA recommends that the Sustainable First Policy could be further improved with a greater emphasis on revising standards and specifications, adopting global best practices, offering targeted incentives and supporting the expanded use of supplementary cementitious materials. CCA also supports the importance of tools like Environmental Product Declarations (EPDs) and the need for financial incentives to accelerate decarbonisation and a broader circular economy.

Many of the issues in the draft Policy were also addressed in the recent CCA submission on the Australian Government's Transport and Infrastructure Net Zero Consultation Roadmap available [here](#). More details 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@cca.com.au](mailto:roger.buckley@cca.com.au).

Yours sincerely

MICHAEL KILGARIFF  
Chief Executive Officer

## APPENDIX 1

### DETAILED COMMENTS ON THE DRAFT TRANSPORT PORTFOLIO SUSTAINABLE FIRST POLICY

#### Whole-of-Life Approach

- CCAA supports the Policy's emphasis on whole-of-life costing, lifecycle carbon assessments, and materiality analysis to drive decarbonisation across transport projects. It is important that this approach is integrated into planning, design, and procurement processes.
- CCAA supports the Policy's material demand analysis to understand available market supply and project requirements during construction phases. This should identify any supply chain constraints, including for cement, concrete, and aggregates, early in the project life.

#### Procurement and Contracts

- CCAA supports the procurement guidelines designed to encourage the use of lower carbon concrete in infrastructure as the supply of such concrete becomes available to help enable the WA State target of 80% GHG reductions by 2030.
- Procurement guidelines must recognise the lifecycle carbon impact of a project rather than just the upfront embedded carbon. Projects built from concrete, including roads, bridges and structures typically require less maintenance and last longer.
- Such procurement guidelines should also recognise the challenges of sticking to the initially specified lower carbon concretes. The use of lower carbon concretes can lead to higher construction costs and may impact curing times, or the time taken to reach required performance, such as strength, potentially resulting in project delays.
- These factors often lead to project managers and others seeking concessions to the use of higher carbon concretes. The Policy should financially incentivise projects to comply to their original plans to achieving the stated carbon objectives of the infrastructure project.

#### Revised Standards and Specifications

- CCAA recommends the Policy include a stronger position on revising specifications and standards to support the greater use of innovative materials that include recycled and lower carbon options.
- Existing prescriptive specifications are a real barrier to the increased use of these innovative materials.
- CCAA recommends the Policy support the redesign of standards that facilitate decarbonisation, such as changes to AS3972-2010 (General Purpose and blended cements). Without substantive changes to these Australian Standards and to Department of Transport/MRWA/PTA specifications, decarbonising transport infrastructure will be limited more than the technology allows.
- A procurement framework where these materials are incorporated into transport infrastructure on an appropriate risk basis will properly reflect broader government policies on reducing emissions.

- CCAA supports the fast tracking of standards and specification changes by adopting standards and practices from the USA and Europe that reflect international best practice.

### **Material Efficiency**

- CCAA recommends the early planning for sustainable infrastructure is further supported with a clear focus on material efficiency, specifying lower carbon concrete and recycled and reused materials through revised, performance-based specifications and using improved construction technologies.

### **Environmental Product Declarations (EPDs)**

- CCAA supports the use of Environmental Product Declarations (EPDs) as the key evidence for carbon accounting. Disclosure of embodied GHG emissions through the development of EPDs based on robust and comprehensive data will enable fair comparison of construction materials and products and facilitate procurement of these products with lower embodied greenhouse gas emissions.
- CCAA recommends the Policy supports a grant program, similar to the USA Environmental Protection Agency (EPA) scheme<sup>1</sup>, to support businesses that manufacture cement and concrete to develop and verify Environmental Product Declarations (EPDs) for materials used across the infrastructure sector.

### **Knowledge Transfer and Promotion**

- CCAA supports the concept of a Transport Portfolio Knowledge Hub that will be a tool available across the supply chain to share knowledge, case studies and learnings from applying new low carbon and recycled materials in transport infrastructure, operations and maintenance contracts.
- The Hub could be expanded to incorporate specific training and education offerings to overcome resistance from contractors and stakeholders when implementing low-carbon or recycled solutions.
- The Hub could also be expanded to act as a virtual marketplace for innovative, sustainable products, bringing potential suppliers together with potential customers.

### **Zero-Emission Vehicles (ZEVs)**

- CCAA supports the Policy's transition to zero-emission transport fleets, including non-road vehicles in construction and recommends that this is further extended to financial incentives and support for transitioning to ZEVs within the broader concrete and construction supply chain that supports infrastructure projects.
- CCAA recommends the Policy should investigate the viability for biodiesel to be a transitional fuel to ZEV, given it is compatible with existing plant while potentially delivering a 60% reduction in CO<sub>2</sub>. CCAA also notes the support from the WA Government for BP's biofuel refinery at Kwinana.

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<sup>1</sup> <https://www.epa.gov/greenerproducts/grant-program-reducing-embodied-greenhouse-gas-emissions-construction-materials-and>