

8 April 2025

Climate Change Project Team
Department of Energy, Environment and Climate Action
Victorian Government

Via online submission portal available [here](#):

Victoria's Draft Climate Change Strategy

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments to the Department of Energy, Environment and Climate Action (DEECA) on Victoria's draft Climate Change Strategy.

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 and gravel extraction operations throughout the nation. CCAA members produce the majority of Australia's cement, concrete & aggregates, and ranges from large global companies to SMEs and family operated businesses.

Representing an industry that generates \$15 billion in annual revenues and contributes to the employment of approximately 110,000 Australians, CCAA underscores the critical need to decarbonise cement, concrete, and aggregate production to support a sustainable Victoria and sustainable infrastructure development.

In recognition of the challenge of climate change, the Cement & Concrete industries have declared an ambition to deliver net zero carbon cement and concrete to Australian society by 2050. The industry released the [Decarbonisation Pathways for the Australian Cement and Concrete Sector](#) report (accompanying this submission) that identifies key principles and opportunities for decarbonisation specifically relevant for this sector. This report was further supported by the release of the [Cement & Concrete Industry Decarbonisation Facilitation Plan](#) (accompanying this submission).

CCAA provides the following recommendations aimed at facilitating the transition to net zero and should be included in Victoria's Climate Change Strategy:

- **Whole-of-Life Carbon Approach:**
Implementing a holistic approach to planning, design, and carbon estimates in government projects to accurately represent carbon footprints.
- **Public procurement practices must reflect government policies on reducing emissions.**
- **Revised Standards and Specifications:**
Encouraging federal support for redesigning standards to enable decarbonisation, such as changes to AS3972- 2010 for General Purpose and blended cements.
- **Adopting Global Practices:**
Fast-tracking standards and specification changes by adopting best practices from the USA and Europe.

- **Material Efficiency:**
Promoting designs that prioritise material efficiency, specify lower carbon concrete, and improve construction technologies.
- **Supplementary Cementitious Materials:**
Moving towards performance-based specifications to increase the use of materials like Fly Ash and Blast Furnace Slag.
Funding to facilitate new infrastructure at ready mix concrete plants to support the roll out of low carbon concrete.
- **Supporting EPDs:**
Accelerating the development of Environmental Product Declarations (EPDs) across the industry, through implementing funding programs similar to those available internationally, including grants to facilitate the broader uptake of Green Cement and Green Concrete.
- **Training and Information:**
Providing supply chain training on using lower carbon concrete and mitigating resistance from project managers and contractors as well as promoting successful low-carbon projects and materials.
- **Support for the roll out of zero-emission vehicles (ZEVs)**
Incentivise industry adoption of ZEVs, and upgrade road infrastructure to accommodate these vehicles. There is the need to create certainty for the transport industry to invest in decarbonisation measures, as highlighted in the draft Victorian Freight Strategy.
- **Planning protection for strategic resources**
There needs to be appropriate protections to ensure aggregate and sand resources close to demand can be protected, to minimise transport distances and associated emissions.
- **Government procurement practices should recognise the benefits of concrete in delivering resilient [houses and infrastructure](#).**

More detail to support these recommendations are outlined in CCAA's [submission](#) to the Commonwealth Government's Transport and Infrastructure Net Zero Consultation Roadmap (accompanying this submission). These recommendations are as relevant to the Victorian Government as they are to the Commonwealth Government.

CCAA's recommendations also support *Recommendation 24 - Reduce greenhouse gas emissions from infrastructure* in Infrastructure Victoria's draft *30-year Infrastructure Strategy*.

The Heavy Construction Materials Industry, represented by CCAA, aims to significantly contribute to Victoria's net zero goals, addressing both the supply chain challenges and the broader policy framework required for sustainable infrastructure development and a sustainable economy.

To discuss this submission further, please contact Roger Buckley at roger.buckley@ccaa.com.au.

Yours sincerely

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