CEMENT CONCRETE & AGGREGATES AUSTRALIA

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Renewables, Climate and Future Industries Tasmania
Department of State Growth
GPO Box 536,
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Submission Via Engage with the Department of State Growth website

Independent Review of the *Climate Change (State Action) Act 2008*

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide a submission to the Independent Review of the *Climate Change (State Action) Act 2008* (the Act).

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

It generates approximately $15 billion in annual revenues and employs approximately 30,000 Australians directly and a further 80,000 indirectly. The Heavy Construction Materials Industry is vital to the nation's building and construction industries and underpins the development of Australia's physical infrastructure.

Industry Decarbonisation Pathways

CCAA and its members supports the aims of the Act to reduce emissions, enable reporting on emissions, adapt to the impacts of climate change, facilitate stakeholder and community consultation, enable transition to a low emissions economy and build climate resilience.

In 2021, the Cement and Concrete industry declared its Ambition Statement to deliver net zero carbon cement and concrete to Australian society by 2050.

Achievement of this collective goal will require technological, regulatory, structural, and behavioural change. To better understand the opportunities available to decarbonise, CCAA, in partnership with the Cement Industry Federation (CIF) commissioned VDZ, a global engineering house with concrete expertise to report on the pathways for the Australian cement and concrete sector to decarbonise.

This resulted in the publication of a report, Decarbonisation Pathways for the Australian Cement and Concrete Sector (2021) that has enabled a better understanding of the technologies and practices necessary to decarbonise Australian cement and concrete.

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From the report, eight decarbonisation pathways have been identified (See Figure 1).

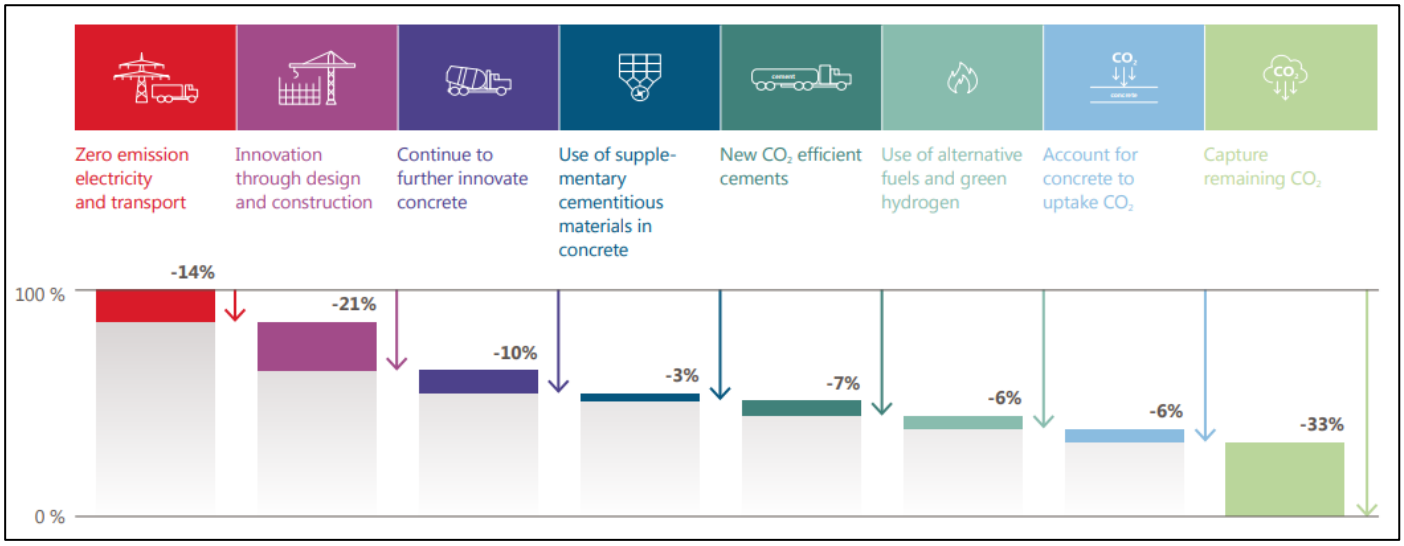

Figure 1 - Identified decarbonisation pathways for cement and concrete

The Report and the subsequent Industry Decarbonisation Facilitation Plan developed by CCAA & CIF shows the impact and actions required for the various pathways necessary to decarbonise Australian cement and concrete.

While industry can take significant steps to decarbonise the cement, concrete, and aggregate supply chains, it must be supported by State Government action underpinned by the various targets and plans required to be made by the Act.

Recommendations

CCAA makes the following recommendations to the Independent Review so the *Climate Change (State Action) Act 2008* better supports a sustainable cement, concrete and quarrying sector while still driving real emissions cuts.

1. **Adoption of the National Sustainable Procurement in Infrastructure Guideline**

CCAA **recommends** that Tasmania should adopt the *National Sustainable Procurement in Infrastructure Guideline*, first prepared in 2025, as the manner by which sustainable procurement practices are given effect in Tasmania.

This will mean the jurisdiction will be adopting national best practice in managing the impact of climate change

2. **Require procurement of low-carbon cement**

The outcomes of the National Guideline can be delivered if government procurement practices mandate the use of performance based low-carbon concrete falling within the internationally recognised AA-G concrete carbon rating framework using the upcoming Australian Adaptation to the Global Cement and Concrete Association's *Global Low Carbon Ratings for Cement and Concrete* .

This would allow for the increased use of Supplementary Cementitious Materials (SCMS) such as fly ash and Ground Granulated Blast-furnace Slag (GGBFS), and other mix innovations.

Why this matters locally: local suppliers can already deliver lower-carbon mixes as the recent UTAS builds demonstrated greater than 30 percent embodied-carbon cuts using low-carbon concrete. Greater market pull is required to further the affordable supply of low-carbon concrete. Support for local suppliers also further reduces the need for imported carbon-intensive goods.

3. **Requirement for specified products to have an Environmental Product Declaration (EPD)**

An EPD is an independently verified and registered document that communicates transparent and comparable information about the life-cycle environmental impact (including carbon emissions) of products and services in a credible way.

The use of an EPD is recommended by both the *National Sustainable Procurement in Infrastructure Guideline* as well as the Infrastructure and Transport Ministers *Embodied Carbon Measurement for Infrastructure Technical Guidance* (2024)

4. **Create a clear approvals pathway for alternative fuels in industrial uses**

CCAA **recommends** a single, streamlined approvals and guidance package (covering both EPA and local council planning requirements) for proposals directly related to significant carbon emission reductions for industrial uses such as co-processing wood waste, tyre-derived fuel, and other waste-derived fuels in cement kilns and other industrial uses.

Current requirements involve significant red tape, time and costs for proponents to make changes within an existing industrial use area with significant existing environmental and planning requirements.

5. **Support circular aggregates (within standards)**

CCAA **recommends** that the Act directs the State to update guidance/specifications so recycled aggregates and suitable alternative sands (e.g., recycled crushed glass in non-structural uses where specifications permit) are considered by default in tenders, consistent with Austroads specifications and industry guidance.

This would include the review and removal of regulatory barriers, such as additional consents, preventing the re-processing of concrete waste by quarries and ensuring that concrete waste, when returned for reprocessing or use, is recognised as a product, and not subject to waste regulations.

6. **Coordinate with the Commonwealth Safeguard Mechanism**

CCAA **recommends** that any Tasmanian measures, including legislation, complement—not duplicate—federal obligations for facilities covered by the Safeguard Mechanism. The Review should recommend explicit alignment with Safeguard baselines, crediting, and timelines to avoid compliance double-handling and carbon-leakage risk.

7. Targeted investment & incentives for hard-to-abate emissions

CCAA **recommends** the Government create a fund to encourage the uptake of industrial carbon reducing upgrades, including kiln upgrades, alternative fuel infrastructure, material handling, and on-site renewables/energy storage/electrification and efficiency opportunities in quarries and concrete batch plants (e.g., crushers, screens, conveyors) and so complement existing federal programs like the Powering the Regions Fund.

8. Decarbonise materials transport & fleets

CCAA **recommends** the legislation should prioritise heavy-vehicle decarbonisation (charging/refuelling at quarry and concrete batching sites, smart routing, last kilometre access, and pilot BEV/renewable-fuel trials) given transport's sizable share of Tasmanian emissions.

The construction and infrastructure industry in Australia relies on about 100,000 heavy vehicle movements daily to deliver vital materials. Shifting to zero-emission heavy vehicles (ZEVs) could significantly support a 7 percent emissions reduction as outlined in Figure 1, but the transition is complex. Challenges include sourcing ZEVs that meet legal and operational requirements in Tasmania and ensuring efficient refuelling. The industry also needs access to every local road, which adds difficulty, especially for concrete delivery. Zero-emission concrete agitator trucks face additional constraints due to higher axle loads, complicating last kilometre road access. Despite these hurdles, ZEV adoption presents a major opportunity to reduce industry emissions.

More detail is provided in CCAA's submission on the Consultation Draft of the Future Clean Fuels Strategy.

Conclusion

While industry is advancing low-carbon solutions, CCAA emphasises the complementary role that State Government plays in ensuring emission reductions targets are met.

To this end, CCAA has provided a range of recommendations designed to reduce emissions while supporting a sustainable supply chain and resilient infrastructure.

To discuss this further, please contact Roger Buckley, State Director, Victoria and Tasmania roger.buckley@ccaa.com.au.

Yours sincerely

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