

16 December 2025

Waste Strategy Review
Department of Water and Environmental Regulation
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Review of Western Australia's *Waste Avoidance and Resource Recovery Strategy 2030*

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments on the Beyond Waste 2030 Resource Recovery Strategy and its accompanying Roadmap.

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 and aggregates, and ranges from large global companies to SMEs and family operated businesses.

CCAA supports the intention to realise the economic potential of recycling and the circular economy set out in the Strategy and Roadmap and is pleased that the CCAA suggestion made in its 2024 submission to Waste Strategy Review (Attached) to adopt 'better practice' approaches to waste management for all forms of waste. 'Better practice' is defined in the Roadmap as meaning benchmarking targets and outcomes against comparable jurisdictions.

More generally we are pleased that, as indicated on page 17 of the Strategy document, every intention is being made to align this strategy to the *National Waste Policy Action Plan* and *Australia's Circular Economy Framework* to ensure efficiency, reduce duplication and facilitate coordination of effort.

This is because many of our members operate in a number of different jurisdictions across the country and so the establishment of more uniform waste reduction goals and requirements will allow members to efficiently develop practices that can be adopted nationally to achieve required outcomes.

We therefore also hope that the intention to improve data collection discussed in the Strategy and Roadmap will lead to the publication of data that will allow comparison of WA's performance with other jurisdictions.

CCAA also endorses proposed Action 1.1.1 contained in the Roadmap to implement the Sustainable Infrastructure Policy.

That policy proposes, among other things, the adoption of the *Embodied Carbon Measurement for Infrastructure: Technical Guidance*, endorsed by the Infrastructure and Transport Ministers Meeting in 2024 and designed to support the consistent measurement and reporting of embodied carbon emissions across public infrastructure projects.

The Guidance document in turn endorses the use of Environmental Product Declarations (EPDs) for materials where they are available.

EPDs are increasingly used to make procurement decisions internationally.

CCAA has recently launched an Australian specific adoption of the GCCA Global Ratings for Low Carbon and Near Zero Concrete¹, which is designed to be used with a third party verified EPD to allow a carbon footprint comparison of concrete products through globally consistent ratings so as to allow end users of cement products to minimise the carbon footprint of the relevant asset in a convenient and efficient manner.

It follows that the final Strategy document should encourage the use of EPDs when procuring cement and concrete products for use in infrastructure.

We also note the intention in Actions 2.1.1 and 2.1.2 of the Roadmap to further develop and implement the Recovered Materials Framework and to transition the Roads to Reuse Program into the Framework, although it is expressed to be something done over the 'medium term'.

As indicated in its 2024 submission to the Waste Strategy Review, CCAA was disappointed to be told the Framework will not legally commence until at least 2027 and hopes that this timeframe can be met if it cannot be done sooner.

We reconfirm that concrete and demolition (C&D) material, fly ash, Incinerator bottom ash aggregate and Lithium mining waste (aluminosilicate and delithiated beta spodumene) should be included as Priority 3 materials in the Recovered Materials Framework.

This will be particularly necessary if the high level of recycling of construction and demolition (currently 88%, as indicated in the Strategy Paper) is to be maintained.

CCAA finally suggests that the Roads to Reuse Program will need to be properly funded if local government authorities are to be incentivised to use recycled materials. As indicated in CCAA's earlier submission, 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.

We hope that the Strategy and Roadmap can be finalised as soon as possible so that the intention to encourage the greater adoption of circular economy goals in WA can be given effect.

Should you require further information, Jason Kuchel, State Director for Western Australia is available on [REDACTED] or Email: [REDACTED]

Yours faithfully

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Michael Kilgariff
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