

17 December 2025

Protected Species and Ecological Communities Branch  
Department of Climate Change, Energy, the Environment and Water  
GPO Box 3090  
Canberra ACT 2601

Attention: [Recoveryplans@dcceew.gov.au](mailto:Recoveryplans@dcceew.gov.au)

**Submission for “Draft National Recovery Plan for Melaleuca sp Wanneroo”, (listed Threatened) under EPBC Act 1999**

Cement, Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comment on the Draft National Recovery Plan for Melaleuca sp. Wanneroo.

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.

**Support for the Draft Recovery Plan**

CCAA supports the overarching objectives of the Draft National Recovery Plan and recognises the importance of conserving Melaleuca sp. Wanneroo as a species of national environmental significance. Our members are committed to operating in accordance with environmental legislation and contributing to conservation outcomes that protect biodiversity while enabling sustainable development.

CCAA members operating in Western Australia have a strong track record of working with regulators and environmental stakeholders to avoid direct impacts on threatened flora wherever practicable. Importantly, our members do not seek to clear Melaleuca sp. Wanneroo and acknowledge the need for appropriate measures to ensure the species' long-term persistence.

**Buffer Zone Considerations**

While supportive of the intent of the Draft Recovery Plan, CCAA is concerned that the plan does not clearly specify an appropriate or evidence-based buffer zone for Melaleuca sp. Wanneroo populations.

Current regulatory practice in Western Australia generally applies buffer distances of 50 metres or less around occurrences of the species, based on site-specific assessments and established guidance. The absence of clear limits or justification within the Draft Recovery Plan creates uncertainty and raises the potential for buffer zones to be increased beyond current practice without sufficient scientific basis.

CCAA members are concerned that any increase in buffer zone requirements would have significant implications for existing and future operations, despite there being no intention to clear the species itself. Certainty regarding buffer distances is essential for long-term planning, approvals, and investment decisions.

CCAA therefore submits that the Recovery Plan should explicitly recognise existing Western Australian buffer practices and ensure that buffer zones are not increased beyond current norms unless supported by robust scientific evidence and informed stakeholder consultation.

### **Importance of Limestone Resources**

Limestone resources in the Wanneroo and broader Perth region are critical to the production of cement, concrete, and aggregates that underpin housing and infrastructure development in Western Australia. These materials are essential to meeting the State's current and future housing demand, particularly in the context of population growth and housing affordability challenges.

Any expansion of buffer zones beyond established practice risks sterilising strategically important limestone resources, potentially constraining supply and increasing construction costs. This would have broader economic and social consequences, including impacts on housing availability and infrastructure delivery.

### **Conclusion**

CCAA supports the Draft National Recovery Plan for *Melaleuca* sp. Wanneroo and its conservation objectives. However, we respectfully submit that the final plan should:

- Recognise existing Western Australian buffer practices, which are generally 50 metres or less
- Avoid increasing buffer zone requirements without strong scientific justification
- Provide certainty for industry while maintaining appropriate protection for the species
- Acknowledge the critical importance of limestone resources to housing and infrastructure development in Western Australia

CCAA and its members remain committed to working constructively with government to achieve balanced outcomes that protect environmental values while supporting sustainable development.

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

Yours faithfully

[REDACTED]

Michael Kilgariff  
Chief Executive Officer