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Green Building Council of Australia
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200 Barangaroo Ave, Barangaroo NSW 2000
Via email: consultation@gbca.org.au

Submission on the Draft GBCA Nature Positive Roadmap for New Developments

On behalf of Cement Concrete & Aggregates Australia (CCAA), I am pleased to submit our response to the [GBCA Nature positive roadmap for new developments - consultation draft](#).

Cement Concrete & Aggregates Australia is the voice of the heavy construction materials industry in Australia. CCAA members produce the majority of Australia's cement, concrete, and aggregates, which are crucial to Australia's building and construction sectors. These materials support the development of our nation's transport, energy, water, housing, defence, and social infrastructure. The industry generates approximately \$15 Billion in annual revenues and employs approximately 30,000 Australians directly and a further 80,000 indirectly.

Consistent with community ideals, and Australia's 2024-2030 Nature Strategy, CCAA supports halting Australia's biodiversity loss and setting a pathway to recovery.

We also recognise that the cement, concrete and aggregates industry has an important role to play in protecting biodiversity. CCAA and our industry is committed to continual improvement in its Environmental, Social, and Governance (ESG) performance, including sustainability and biodiversity.

Importantly, our industry already operates within a highly regulated and effective framework that embeds biodiversity considerations at multiple levels. The Federal *Environment Protection and Biodiversity Conservation Act* and State planning laws, local government development assessment processes, environmental permits, rehabilitation requirements, and conditions of approval all collectively ensure that biodiversity risks are addressed throughout the project lifecycle.

Beyond regulation, market incentives are also driving better biodiversity outcomes. Procurement processes across major infrastructure, Tier 1 residential construction, and project home companies increasingly require Environmental Product Declarations (EPDs), circular economy outcomes, and demonstrated biodiversity stewardship. These processes combined provide strong incentives for continual improvement and ensuring that industry balances environmental protection with community growth aspirations. CCAA also supports the development of practical, science-based indicators of biodiversity performance that build on these existing frameworks, rather than duplicating them.

While challenges remain, examples of biodiversity progress in the cement, concrete and aggregates industry include:

- Reducing the disturbance on ecosystems through offset arrangements. Our members report that offset arrangements greater than 4:1 (eg 1 hectare of cleared habitat requiring 4 hectares of new habitat) are now common.

- Maximising the use of raw materials such as glass and concrete rubble as recycled aggregate. Promoting this will require changes to State-based regulations, to enable more use by creating a product ‘pull’ rather than ‘push’ environment, and developing environmental incentives. These issues were outlined in the CCAA Submission to the Productivity Commission Inquiry into the Circular Economy¹.
- Reducing greenhouse gas emissions through implementation of industry’s *Decarbonisation Pathways for the Australian Cement and Concrete Sector*². Specific actions include:
 - The development of Low Carbon Concretes using supplementary cementitious materials (fly-ash and slag predominantly) to replace cement in the manufacture of concrete and using less limestone in the manufacture of cement. Achieving this will however require changes to State-Government concrete standards, Australian standards, certain state-based regulations, as well as State and Federal Procurement processes³.
 - Continued heavy vehicle (HV) fleet electrification. Promoting this will however require improved access to recharging infrastructure and mass tolerance concessions on our HV network⁴.
 - The adoption of EPDs across the construction materials supply chain to provide a scientifically robust, third-party verified method for reporting the environmental impacts of products, including embodied carbon⁵.

We also note that the draft (page 50) outlines a prescriptive view of the expected response of stakeholders – including Materials manufacturers and product suppliers - to deliver a nature positive built environment. It is important that there is Government and Industry collaboration in the determination of these key industry roles and that CCAA and its members articulate our preferred pathway. This includes resisting overly restrictive planning controls (each project should be assessed on its merits) and onerous reporting requirements which risk diverting valuable resources.

We encourage GBCA to adopt a collaborative implementation approach, recognising that partnerships between government, industry and the community are more effective than prescriptive obligations. The Roadmap should accelerate the use of existing solutions, incentivise innovation and recognise contributions already being delivered, such as circular economy initiatives and low-carbon concretes, to ensure the framework is both ambitious and achievable.

In this spirit, we urge the final paper to adopt more balanced language and greater emphasis on:

- Acknowledging the significant and effective regulatory and market incentives that already exist and that are emerging.

¹ [Submission on the Productivity Commission Interim Report on Australia’s Circular Economy](#)

² [Decarbonisation Pathways for the Australian Cement and Concrete Sector](#)

³ [CCAA Submission to the Transport and Infrastructure Net Zero Consultation Roadmap](#)

⁴ [2025 - 2026 Pre-Budget Submission](#)

⁵ [CCAA Submission on the Development of a National Construction Strategy for Transport Infrastructure](#)

- The importance of stakeholder collaboration in defining the nuanced biodiversity 'problem statement' for each industry and developing the right set of regulatory and market incentives.
- Improved data and science to understand the true cumulative impacts of activity on Australia's biodiversity to inform planning decisions and promote investment certainty⁶.
- Improved R&D and innovation in supporting nature positive outcomes – such as the use of different wastes in the manufacture of concrete to support improved circular economy/recycled aggregate outcomes.

This approach will better guide collaboration between government, industry, and the community in achieving shared biodiversity goals.

We thank you for the opportunity to comment and look forward to working with GBCA to ensure that the roadmap delivers practical and effective outcomes for both biodiversity and Australia's growth aspirations.

For further information, please contact Michael Kilgariff on Michael.kilgariff@ccaa.com.au or 0418 627 995.

Yours sincerely

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⁶ [CCAA Submission on Potential Amendments to Biodiversity Conservation Regulation 2017 Consultation Paper](#)