

6 June 2025

National Competition Analysis 2025  
Productivity Commission  
Locked Bag 2 Collins St  
East Melbourne VIC 8003

### **CCAA/CIF Submission to National Competition Policy Analysis 2025**

Cement Concrete and Aggregates Australia (CCAA) and the Cement Industry Federation (CIF) welcome the opportunity to make a submission on the Productivity Commission's *National Competition Policy Analysis 2025*.

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 and aggregates, and ranges from large global companies to SMEs and family operated businesses. [View CCAA members](#)

The CIF is the national body representing all Australian integrated cement manufacturers - Adbri Ltd, Boral Cement Ltd and Cement Australia Pty Ltd. CIF members are also members of CCAA.

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

We note that the Commission has been asked to advise on:

- adopting international and overseas standards in regulatory frameworks, and
- harmonising regulated standards across Australia in priority sectors identified by governments.

#### International Standards

Standards are essentially frameworks that describe the best ways of doing things and facilitate a common understanding of processes, procedures and methodologies.

Overseas standards may be technically sound, but they are developed in different legal, environmental, and policy contexts.

Standards Australia's system relies on contributions from over 6,500 committee members and hundreds of nominating organisations, which includes CCAA, CIF and our members.

These experts ensure that standards are fit-for-purpose, reflect Australian conditions, and are aligned with regulatory as well as industry needs.

Standards adopting best practices from other jurisdictions, such as the US and Europe, should be encouraged so the best ideas from around the world can be adopted in Australia.

Standards Australia is the national member body at both the International Standards Organisation (ISO) and the International Electrotechnical Commission (IEC).

As such, Standards Australia already has the option to participate or observe on international technical committees, sub-committees, project committees and systems committees, with Australian committees acting as 'mirror committees' to their international equivalents, such that Australian standards can reflect, as appropriate, work developed internationally.

We also note that, absent a legislative requirement, there is nothing which stops a company from adopting an international standard where, in its opinion, there is commercial benefit.

CCAA and CIF consider that the priority should be to encourage governments and commercial entities to work within the Standards Australia framework to shift from prescriptive to performance-based specifications to enable innovation and maximise resource utilisation.

Overly prescriptive specifications and restrictive material requirements are creating barriers to industry innovation and decarbonisation as well as contributing to the increasing cost of infrastructure.

We would therefore encourage the Productivity Commission to recommend to the Australian Government that it fund a review of relevant Australian Standards, so they have the flexibility to capture improvements in processes without compromising safety and so improving productivity outcomes.

One such Standard that should be reviewed as a matter of priority is AS 3972-2010 *General Purpose and Blended Cements*.

In the context of moving towards performance-based specifications and away from prescription, the minimum amounts of Portland cement required by the standard should be reviewed to support increased flexibility in binder content and composition. Allowing for the greater uptake of higher limestone additions and other supplementary cementitious materials (SCM) such as Fly Ash and Blast Furnace Slag would facilitate the adoption of new, lower-carbon cement types.

If implemented, the change would have the added advantage of saving in the order of 10 per cent<sup>1</sup> of the embodied carbon in concrete and so support the Government and Industry's Net Zero objectives.

CCAA and CIF recognise that international standards can be of value when developing Australian Standards. However, Australia's well established technical expertise should be relied upon to ensure that local standards are fit-for-purpose, reflect Australian conditions, and are aligned with regulatory and industry needs.

Further, to enhance productivity outcomes the emphasis should be on the redevelopment of key standards, referred to in legislation or in commercial documentation, to reflect performance-based specifications.

### Harmonising Regulated Standards

Australia's heavy construction materials industry, including cement manufacturers and concrete producers, operate throughout Australia and across all jurisdictions. As such, harmonisation across all jurisdictions is an important concept that has the potential to improve productivity across a number of areas – including regulated standards.

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<sup>1</sup> Source - VDZ. (2021). *Decarbonisation Pathways for the Australian Cement and Concrete Sector*.

For example, there is currently a disparity between national as well as state/territory approaches to emissions reduction and target setting – which leads to differing levels and types of legislation/ regulation depending on the level of ambition of the jurisdiction. This in turn has the potential to flow through to standards and specifications, which may not be as aligned as they could be.

This misalignment is also becoming more pronounced in relation to nature-related regulation. Biodiversity protection, land use, offset requirements and vegetation clearing rules now vary widely across states and territories, creating complexity for nationally operating firms. As governments ramp up efforts to meet their biodiversity and nature-positive goals, greater coordination is needed to ensure that regulatory frameworks remain coherent and do not inadvertently impede investment in development or decarbonisation.

There is also a notable lack of harmonisation in workplace safety frameworks, particularly with respect to workers compensation schemes. These schemes operate with different premiums, claim thresholds, and rehabilitation requirements in each jurisdiction. For companies operating across state borders, these inconsistencies increase compliance burdens and administrative complexity and can lead to unequal outcomes for employees injured while undertaking the same type of work in different states.

CCAA and CIF support Governments actively working to promote a consistent and integrated approach to industry, environment, climate and energy policy – and associated measures (including standards) – across all Australian jurisdictions. Minimising the regulatory burden and working to improve the alignment of standards and specifications should be a key goal of all jurisdictions.

In addition, both CCAA and CIF agree that, as far as practicable, State and Territory jurisdictions should adopt the same standards when procuring goods and services when developing infrastructure projects.

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Yours sincerely

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