

26 June 2025

Queensland Waste Strategy (2025-2030)
Office of Circular Economy
Department of the Environment, Tourism, Science and Innovation
Brisbane

Via: Online survey

Subject: CCAA submission to the Queensland Waste Strategy (2025-2030)

Dear Sir/Madam

Cement Concrete & Aggregates Australia (CCA) welcomes public consultation on the Queensland Government's *Draft Waste Strategy 2025–2030*.

CCA is the voice of the heavy construction materials industry in Australia. CCA 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.

CCA's aggregate and concrete members play a critical role in Queensland's circular economy by recovering and reusing millions of tonnes per year of construction waste such as old concrete and surplus quarry materials. These materials are crushed, treated, and repurposed into road base, drainage aggregate, fill for construction sites, and new batches of concrete thereby keeping valuable resources out of landfill. Washout water at batching plants is also recycled.

Further, CCA's cement and concrete members utilise wastes like fly ash and slag from third-party operations as supplementary cementitious materials (SCM) in the manufacture of concrete. These SCM's replace a portion of traditional cement in concrete production – thereby reducing carbon emissions and enhancing the sustainability of the built environment.

These practices not only reduce environmental impacts and reliance on virgin materials but also lowers water consumption and carbon emissions as less energy-intensive cement and lower energy overall is required and supports the delivery of low-carbon infrastructure across the state.

The Queensland heavy construction materials industry is ready to lead Queensland's transition to a circular economy, but we are being held back by onerous End of Waste (EOW) Codes; outdated concrete standards; a lack of government sustainable procurement policies to 'pull' demand for low-carbon concretes that utilise SCM wastes; missed opportunities to increase utilisation in cement kilns of Tyre Derived Fuel (TDF); regulatory barriers and lack of incentives to increase the use of refuse derived fuels originating from construction and demolition waste and other green waste currently going to land fill; and a lack of financial incentive to recycle.

To address these issues, we support the following strategic recommendations.

CCAA Strategic recommendations

The QLD Government should:

1. Simplify the EOW Framework for low-risk materials like concrete washout and recycled aggregates.
2. Provide clear and consistent definitions of when waste becomes a resource to reduce confusion and support investment.
3. Provide additional flexibility with existing ERA permit use by enabling reuse of materials without needing multiple new permits.
4. Promote policy alignment between circular economy goals and operational regulations, ensuring environmental benefit is matched by practical feasibility.
5. Better utilise and modify Main Roads Technical Standard (MRTS) 70 (Concrete) to increase the utilisation of SCM wastes like fly ash, ground granulated blast furnace slag, calcinated clays, ground limestone and recycled concrete fines.
6. Promote a review of the Cement Standard *AS 3972 General Purpose and Blended Cements* to allow the greater utilisation of fillers in cement to decrease the clinker factor and lower the embodied carbon.
7. Promote a national Sustainable Procurement Framework to promote low-carbon concretes with SCM wastes and a classification scheme for low-carbon concrete.
8. Work with Tyre Stewardship Australia (TSA) to promote cement kilns as a valid and priority end-use for tyres under product stewardship and recycling frameworks.
9. Work with TSA to establish a multi-pathway framework that ensures mechanical, thermal, and energy recovery pathways are considered complementary — not competitive — in delivering circular economy outcomes.
10. Support pilot projects and R&D for emerging technologies that convert waste materials (e.g., concrete fines, washout sludges) into high-value products.
11. Develop or expand voluntary and mandatory product stewardship schemes for construction and demolition (C&D) materials to facilitate increased use as fuel for cement kilns.
12. Offer incentives for upstream producers to design materials that are easier to recycle and recover.
13. Deliver Government procurement policies that prioritise certified construction materials with recycled content.
14. Develop independent certification frameworks to validate recycled content and performance of recycled product.

Queensland has the chance to lead in sustainable construction and resource recovery, but this will require changes to EOW Codes, Australian Standards, QLD specifications, the introduction of government sustainable procurement policies and greater financial incentives to recycle wastes and resources.

Thank you for the opportunity to contribute. We look forward to ongoing engagement with the Department.

Please do not hesitate to contact David Rynne on 0431 729 509 or david.ryne@ccaa.com.au should you wish to arrange a meeting or require additional information.

Yours Sincerely

MICHAEL KILGARIFF
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