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Future Industries
Renewables, Climate and Future Industries Tasmania
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Consultation Draft - Future Clean Fuels Strategy

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments on the Consultation Draft of the Future Clean Fuels Strategy.

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 membership produce the majority of Australia's cement, concrete and aggregates, and ranges from large global companies to SMEs and family operated businesses.

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

CCAA recognises the development of sustainable and innovative clean fuel industries as outlined in the draft Strategy are a key enabler to deliver net zero carbon cement and concrete.

Industry Decarbonisation Pathways

In 2021, the Cement and Concrete industry declared its [Ambition Statement](#) to deliver net zero carbon cement and concrete to Australian society by 2050.

Achievement of this collective goal will require technological, regulatory, structural, and behavioural change. To better understand the opportunities available to decarbonise, CCAA, in partnership with the Cement Industry Federation (CIF) commissioned VDZ, a global engineering house with concrete expertise to report on the pathways for the Australian cement and concrete sector to decarbonise.

This resulted in the publication of a report, [Decarbonisation Pathways for the Australian Cement and Concrete Sector](#) (2021) that has enabled a better understanding of the technologies and practices necessary to decarbonise Australian cement and concrete.

From the report, eight decarbonisation pathways have been identified (See Figure 1).

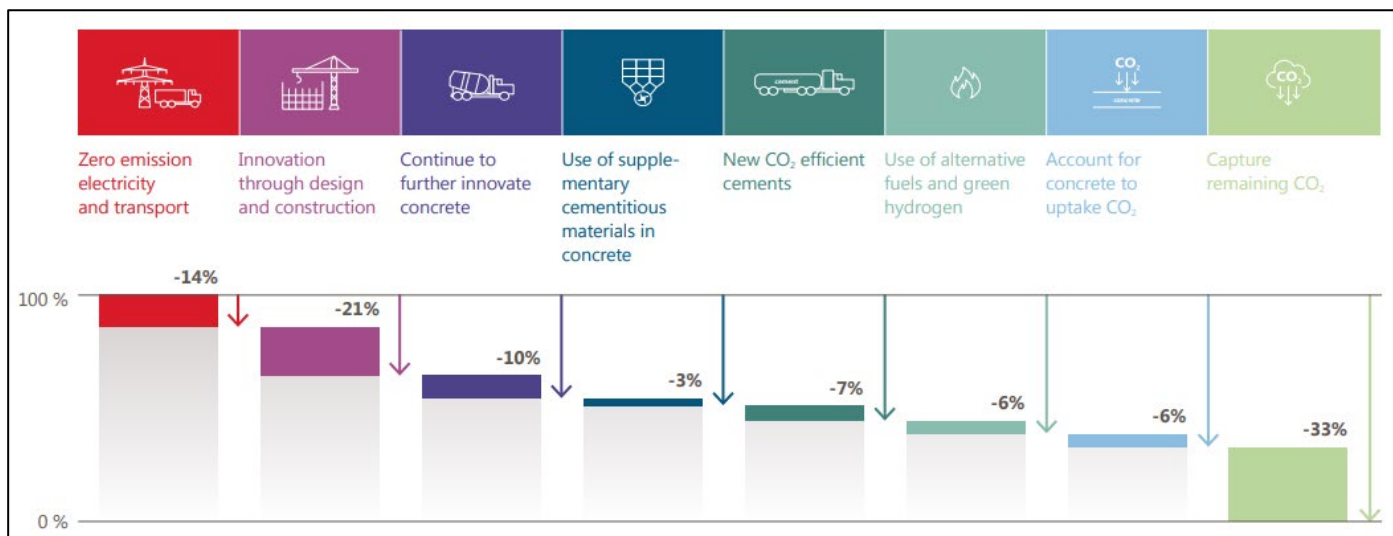


Figure 1 - Identified decarbonisation pathways for cement and concrete

The Report and the subsequent [Industry Decarbonisation Facilitation Plan](#) developed by CCAA & CIF shows that zero emission transport and mobile plant is set to contribute 7 per cent to the total decarbonisation objective.

Whilst industry can make substantial steps to decarbonise cement, concrete and aggregate supply, State Governments as the lead policy makers, procurers of infrastructure and influencers, can facilitate the decarbonisation of transport.

Heavy Vehicles

In the delivery of our Industry's vital materials to their delivery and customer destination, there are approximately 100,000 average heavy vehicle movements in Australia per day (usually during daylight hours) related to our industry.

Delivering these materials using zero emission heavy vehicles would make a strong contribution towards the 7 per cent reduction Pathway opportunity described above.

It is well known however that it is difficult to abate the level of emissions from heavy vehicles. In no small part this is due to the challenges involved in sourcing and purchasing zero emission heavy vehicles (ZEVs) which can be legally used on Tasmanian roads and can be refuelled efficiently.

Perhaps an even greater challenge is that our industry needs to access every single local government-maintained street in Tasmania, at any given point in time, to provide the concrete and aggregates for the infrastructure itself, combined with the housing and commercial developments that are developed along the road network.

Particular to the concrete industry is that zero emission heavy vehicle concrete agitators, required to deliver concrete to local construction projects, may have higher steer axle loads than other industries using heavy vehicles, exacerbating the problem of access to roads generally the domain of lighter vehicles.

This combined with the unique requirement to access every residential street and every country road to deliver concrete, would need to be carefully considered in any strategy.

Recommendations

To make clean fuels more accessible and practical for heavy vehicles in Tasmania, a comprehensive approach addressing infrastructure, policy, technology, and market dynamics is essential. CCAA **supports** the priority areas and actions in the draft Strategy with the following additional recommendations:

1. That the Tasmanian Government identify the extent of road infrastructure upgrades that are required to meet the needs (particularly higher axle loadings) of different types of zero emission heavy vehicles.
2. That the Tasmanian Government determine policy settings for allowing heavier zero emission concrete and aggregate delivery trucks on to every residential street in Tasmania, to give a clear investment signal to industry as to what types of zero emission heavy vehicles will be viable in the medium and long term.
3. That the Tasmanian Government set out a funded plan and timetable for rolling out the infrastructure that would conveniently permit the refuelling of zero emission heavy vehicles throughout the entire Tasmanian road network. Establishing a network of refuelling stations along major freight corridors is crucial for supporting long-haul transport needs.
4. That the Tasmanian Government develop incentives for industry to take up zero emission heavy vehicles for use in the concrete and concrete related product supply chain to enhance vehicle availability and affordability. The Australian market has a limited selection of zero-emission trucks, with most models still in trial phases with often higher initial costs compared to diesel counterparts. Financial incentives, such as subsidies or tax breaks, can help offset these costs and encourage adoption.
5. That the Tasmanian Government establish a Heavy Construction Materials Supply Plan that includes:
 - Appropriate planning protections to ensure aggregate and sand resources and concrete batch plants close to demand can be protected, to minimise transport distances and associated emissions.
 - Streamlined development approvals processes. From a cement manufacturing and quarrying perspective, the cumulative burden of overlapping green and red tape poses a significant barrier to timely investment and innovation. The current regulatory environment — involving multiple agencies with inconsistent requirements — creates uncertainty and delays in the planning, approval, and expansion of essential production facilities. These delays not only inhibit the industry's ability to respond to rising demand but also impact Tasmania's ability to meet sustainability objectives. Streamlined, risk-based environmental assessments and better coordination across agencies are urgently needed to enable lower carbon cement production, supply of quarry materials close to market, encourage circular economy initiatives, and support long-term investment in decarbonisation technologies.

By addressing these areas, Tasmania can create an environment conducive to the adoption of clean fuels in the trucking sector, contributing to net-zero emissions goals and fostering sustainable transport solutions.

To discuss this further, please contact Roger Buckley, State Director, Victoria and Tasmania roger.buckley@ccaa.com.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read "M. Kilgariff".

MICHAEL KILGARIFF
Chief Executive Officer