

25 February 2026

EPA Vic
GPO Box 4395
Melbourne 3001

Via online Engage Victoria submission portal available [here](#).

New methods for calculating EPA financial assurance

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide feedback to EPA Victoria on the *Calculating financial assurance for bulk storage, on-site soil containment and waste and resource recovery facilities Consultation Paper*.

CCAA is the voice of the heavy construction materials industry in Australia. Our members operate cement manufacturing and distribution facilities, concrete batching plants, and hard-rock, sand and gravel extraction operations across the nation. Collectively, CCAA members produce the majority of Australia's cement, concrete and aggregates, and include organisations ranging from large global companies to SMEs and family-owned businesses.

Representing an industry that generates \$15 billion in annual revenue and supports the employment of approximately 110,000 Australians, CCAA supports effective and efficient regulation and constructive stakeholder engagement to ensure a sustainable industry.

CCAA understands from Alison McRae, Manager Compliance Programs, EPA that the current process for assessing financial assurance for certain facilities, such as those processing for recycling purposes paddock rock, asphalt, tiles, bricks or concrete where operational processes are in place to minimise contaminants, will **not** change.

These sites are unlikely to be required to provide financial assurance to the EPA, however, CCAA understands that the EPA will still undertake site-specific assessments to determine the need for financial assurance for individual facilities. This position was outlined in the EPA letter dated 24 March 2023 from Duncan Pendrigh, Director Regulatory Services to CCAA (attached).

EPA should also note that quarry sites are required to provide a rehabilitation bond as calculated by Resources Victoria, and that this bond already accounts for the cost of removing any recycled materials or contaminated materials on the site. Any financial assurance by the EPA will be a doubling up of this cost, and therefore an unnecessary burden on business.

Given there is no proposed change to the assessment method of A13 sites in relation to financial assurance, CCAA has no further comment on the proposed calculation methods.

To discuss this submission further, please contact Tara McCormack, State Director Vic/Tas at

Yours sincerely

MICHAEL KILGARIFF
Chief Executive Officer