

11 July 2023

Waste Strategy Review  
Department of Water and Environmental Regulation  
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Via email: [wastestrategyreview@dwer.wa.gov.au](mailto:wastestrategyreview@dwer.wa.gov.au)

**SUBJECT: DIRECTIONS PAPER: REVIEW OF WESTERN AUSTRALIA'S WASTE AVOIDANCE AND RESOURCE RECOVERY STRATEGY 2030**

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments to the Department of Water and Environmental Regulation (DWER) on the Directions Paper: Review of Western Australia's Waste Avoidance and Resource Recovery Strategy 2030.

CCAA is the peak industry body for the heavy construction materials industry in Australia including the cement, pre-mixed concrete and extractive industries. Our members operate cement distribution facilities, concrete batching plants, hard rock quarries and sand and gravel extraction operations throughout Western Australia.

CCAA members nationally account for 80% of total industry output, with the industry generating \$15 billion per annum in revenue, employing 30,000 Australians directly and supporting the employment of a further 80,000 people. CCAA members produce and supply the heavy construction materials that are used to construct Western Australia's infrastructure. Providing both the raw material and finished product, heavy construction materials contribute to the construction of our roads, railways, bridges, ports, airports, hospitals and school.

CCAA's members service local, regional and national building, construction and infrastructure markets. The reliable and cost-effective supply to these markets is fundamental to sustainable growth and it is CCAA's aim to promote policies that recognise the importance of these materials to Western Australia's sustainable future.

CCAA **recommends** the following aspects are included in the updated Waste Strategy.

- The legislative reform package that will enable the broader use of waste as a resource should be fast tracked to provide policy certainty for industry. It is now almost 3 years since the range of waste discussion papers were released for public comment and this package needs to be finalised to enable investment into the state.
- A specific policy that aims to optimise the use of recycled and reused materials within major transport projects, build a better understanding of the types, volumes and location of recycled and reused material use and support innovation. Such a policy should be based on Victoria's [Recycled First Policy](#). This has been the enabler for Victoria's infrastructure projects to use 2.4 million tonnes of recycled material, more than ten times the amount of material used in Western Australia's Roads to Reuse program.
- Government support for innovation, research and development and the updating of specifications or codes for the use of recycled/recovered materials in the construction sector. This will help commercialise new materials and stimulate market demand. Without these market drivers, the Strategy will not deliver the expected environmental and commercial benefits.

- Recognition of the potential impact of emerging materials such as waste-to-energy bottom ash and lithium processing by product, delithiated beta spodumene (DBS). If a market is not found for these materials, they could add 500,000 tonnes per year to the material going to landfill.
- Encourage the supply chain of recycled products by:
  - Matching areas of demand with location of supply
  - Communicating best practice examples to stakeholders to overturn misconceptions from previous poor experiences with recycled materials
  - Actively managing the change process
  - Expand the Roads to Reuse program
  - Capture data so can measure success
  - Clear guidelines that give practical project examples
- Link in with the Main Roads WA *Industry Sustainability Strategic Approach*. This emerging strategy covers a range of aspects, including innovation, recycling and reuse of materials. The infrastructure construction sector can potentially be a significant market for these materials and the Government's broader Waste Strategy should align with this emerging MRWA strategy.
- The [MetroNet Sustainability Strategy 2021](#) is a good example of how the Waste Avoidance and Resource Recovery Strategy 2030 helped drive positive change in managing waste and increasing recycling. Similar Strategy's should be developed across the infrastructure construction sector.

Western Australia's regulatory environment needs to be internationally competitive to continue to attract capital to invest into the state to ensure a sustainable and competitive heavy construction materials industry. This in turn facilitates Western Australia's productivity, housing affordability and deliver affordable Government infrastructure.

There is no more important time than now for the construction sector, supported by an efficient heavy construction materials supply chain, to provide the engine to build Western Australia's economy and create jobs.

Please do not hesitate to contact me to discuss any of these issues in more detail.

Yours sincerely



**ROGER BUCKLEY**

**State Director Western Australia**