

31 August 2022

Mr Tony Chappel
CEO
NSW Environment Protection Authority
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PARRAMATTA NSW 2124

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Dear Tony,

END OF WASTE CODES TO BOOST CIRCULAR ECONOMY INITIATIVES

Cement Concrete & Aggregates Australia (CCAA) is the peak industry body for cement manufacturers, concrete suppliers and extractive operators throughout New South Wales. Collectively known as the heavy construction materials industry, our members are engaged in the quarrying of sand, stone and gravel, the manufacture of cement and the supply of pre-mixed concrete to meet New South Wales's building and construction needs. These businesses range from large global companies to SMEs and family operated businesses.

Cement, concrete, stone and sand are the critical materials that enables the \$56 Billion New South Wales construction industry, employing 370,000 workers and contributing 45% of the New South Wales taxation revenue base. CCAA notes that the COVID-19 pandemic has had a significant impact upon the economy of New South Wales and we believe that the construction sector, supported by an efficient heavy construction materials supply chain is playing a pivotal role to deliver an economic rebound.

Our industry is committed to the protection and improvement of environmental values and minimising environmental impacts when they arise and we strongly believe that we have an obligation to supply construction materials in an environmentally responsible and sustainable manner and we note the NSW Environment Protection Authority's keen interest in boosting **Circular Economy** initiatives through the recent Resource Recovery Framework.

Members of CCAA's Planning & Environment Subcommittee have referred CCAA to the operation of End of Waste Codes for approved concrete washout operations which are issued by the Queensland Government in accordance with Section 159 of the Waste Reduction and Recycling Act 2011 (WRR Act). The Code places requirements on when the waste becomes a resource and conditions for its reuse.

The key enabler for industry is the ability to process up to 5000 tonnes per annum of recycled concrete at a quarry without the need to apply for planning approval. One of our members recently

sought planning approval for just such an activity, which cost them more than \$100,000 to receive the requisite approvals. The cost and time involved are a disincentive in NSW, whereas the Qld End of Waste Codes encourages the industry to recycle concrete, particularly where their volumes would be unlikely to exceed 5000 tonnes per annum.

The Queensland end of waste code still protects the environment by requiring quarry owners to meet a range of criteria, but simply without the need to seek additional planning approval.

We believe that Qld's End of Waste Codes are a beneficial way to boost broader circular economy initiatives, save industry money with a reduction in red tape and are particularly useful where waste recycling is below 5,000 tonnes annually.

CCAA notes that NSW does not maintain a similar approach and we are keen to advocate for the potential introduction of a similar approach or regulation across New South Wales.

We would appreciate the opportunity to discuss this matter with you in further detail. Accordingly, I can be contacted on 0448 848 848 or email Jason.kuchel@cca.com.

Yours sincerely,



JASON KUCHEL
State Director, New South Wales & South Australia