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Queensland Freight Action Plan project team  
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Dear Queensland Freight Action Plan project team

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide a submission to the Department of Transport and Main Roads on the development of the **Queensland Freight Action Plan 2023-2025**.

CCAA is the peak body for 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 is made up of the majority of material producers and suppliers, 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.

### **About our industry's freight task**

In Queensland each year, the heavy construction materials industry produces approximately: 45 million tonnes of sand, stone and gravel (ie aggregates); 7.2 million cubic metres of pre-mixed concrete; and 2.2 million tonnes of cementitious material (eg cement, flyash). Much of this product is used in building the State's freight networks. For example, to build one kilometre of two-lane highway requires about 14,000 tonnes (or 400 truckloads) of aggregates.

Most of this material is transported via heavy vehicles (with a minor proportion transported by rail, and with some cement clinker transported by ship via ports) and in relatively short distances in urban and peri-urban areas (eg under 60km per delivery for aggregates and under 15km for pre-mixed concrete). There are about 21,000 average heavy vehicle movements in Queensland per day (usually during daylight hours) consisting of:

- 14,000 movements associated with aggregates (eg tippers, truck and dogs)
- 6,400 pre-mixed concrete movements (ie concrete agitators)
- 500 cement tanker movements.

As such, freight efficiency has a big impact on our industry's profitability, and affects our industry's ability to provide cost effective materials for the State's construction sector. Quarries can only be located in certain geographical areas and transport costs are significant. We estimate that an extra 100km haul distance increases material costs by about 36%.

For our industry, the following areas are vital for freight efficiency and safety, with both industry and government having a role:

1. Protection of quarry resource areas (and their transport routes) within local government planning schemes, particularly the prevention of incompatible development (e.g. residential) close by. This ensures our industry can produce and transport materials efficiently.
2. Quality of road and transport infrastructure networks.
3. Being able to utilise Performance Based Standard (PBS) Heavy Vehicles as much as possible – particularly first and last mile access near quarries and concrete plants in industrial areas.
4. Operating hours for quarries. In many quarries, operating hours are restricted to daylight hours only, meaning that there is often a delivery spike from quarries to concrete plants at peak hour times, often a “pinch points” in transport networks.
5. Skilled driver and truck availability as well as attracting and retaining a diverse range of drivers.
6. Investment certainty – companies in our sector make significant investments on transport infrastructure. Certainty in investment parameters are important in making this happen.
7. Ability for legislation to be flexible in relation to technological advances and innovations.

## **Comments on the development of the QLD Freight Action Plan 2023-2025**

### **Shared Commitment 1 – Build Effective Partnerships**

The Olympics and Paralympics being hosted by Brisbane in 2032 will provide a great opportunity for the city, state and nation. Queensland is on the cusp of a decade of growth with the lead up to 2032 also bringing together several other forces that will lead to great opportunities for our region. Interstate and international migration is expected to grow significantly, and we will see the building and completion of other major city and infrastructure projects that will revitalise the region, such as the Cross River Rail project, Queens’ Wharf and critical regional infrastructure such as significant rail upgrades, the Gold Coast Light Rail project, and the Coomera Connector.

To successfully meet these demands, the need for strong and effective partnerships will form a crucial component of the Queensland Freight Action Plan 2023-2025. An integrated, resilient and safe freight system is necessary including improved supply chain efficiency and better planning, coordination and regulation.

CCAA is very supportive of the continuation of the QLD Ministerial Freight Council and recognises the strong leadership demonstrated by the Department of the Transport and Main Roads during COVID19 and recent weather events.

### **Shared Commitment 2 – Unlock Economic Opportunity**

CCAA supports the unlocking of economic benefits such as enabling more urban freight deliveries outside core business hours, in order to improve freight journey times and improve network reliability. With the demand on our road system continues it is vital that “out-of-hours” deliveries be considered to allow operators be able to make deliveries (in addition to their normal operating hours) to reduce road congestion.

Much of the cost associated with heavy construction materials relate to transport costs, particularly heavy vehicle movements in highly congested areas of our major cities. Of those estimated 21,000 truck movements per day associated with our industry, most are currently undertaken during daylight hours, Monday to Friday. If efficiency improvements could be made in the manner that materials are delivered, much of the traffic congestion (and therefore delivery costs) could be alleviated, with negligible or temporary impacts for local communities.

Key improved system productivity could include:

1. Flexibility of delivery times for quarry materials to concrete plants, or for raw cementitious products from cement facilities to concrete plants.
2. Flexibility in local operating conditions in how much raw materials (eg sand, gravel) can be stored at concrete plants allowing heavy vehicle deliveries to be better staggered during the day.
3. Flexibility in site hours for commercial or industrial concrete pours to reduce daytime traffic movements.

### **Shared Commitment 3 – Smarter Connectivity and Access**

CCAA and the heavy construction materials industry agrees with transport options that are safe, efficient and productive. CCAA strongly supports improved heavy vehicle access, including the promotion of strategic road freight routes for higher productivity vehicles and options for addressing first and last mile issues.

CCAA strongly agrees with the importance of having transport and land use planning integrated, as well as future transport corridors protected, and supports planned land use. Our industry requires integrated transport networks that consist of coordinated hubs that allow for the efficient movement of freight by road, rail, air and sea, especially with the predicted increase in freight volumes in the future.

The management of heavy vehicle regulatory requirements is a major issue for our industry, and an area where significant productivity improvements can be yielded. Allowing newer, higher productivity trucks to carry increased loads in a safe manner will reduce truck movements and infrastructure costs.

CCAA members are also supportive of improvements to National Heavy Vehicle Law to accommodate the diversity of the heavy vehicle industry and range of tasks within it – instead of the current “one-size-fits-all” approach.

### **Shared Commitment 4 – A Resilient Freight System**

CCAA is supportive of increased transport system resilience in particular the effects of natural disasters. Our key pavements and infrastructure need to be built to withstand expected increases in the frequency and intensity of major weather events that are associated with climate change. This includes consideration of design and materials, and sustainability assessment tools must include lifecycle and durability indicators, in addition to embodied carbon.

**Shared Commitment 5 – Safer Freight Movements**

Road safety is the shared responsibility of all road users and is taken very seriously by our industry. Our members invest a lot of time and resources into ensuring their vehicles and drivers abide by the highest standards of safety on our roads. As the industry peak body, we work in collaboration with industry to further this objective.

CCAA has also developed a number of initiatives to encourage industry to adopt best practice including the launch of the Agitator Rollover Prevention eLearning Course in 2016, and since 2011 in Queensland, the annual CCAA Innovation Awards in Health & Safety Innovation, Environmental Innovation, Community Engagement and Diversity & Inclusion.

CCAA members also provide road safety education programs surrounding their quarry sites. The aims of these programs are to save lives and keep everyone safe on the roads by learning about heavy vehicles.

**Critical Enabler 1 – Quality Freight Data**

CCAA supports quality freight data regarding freight movement and intelligence.

**Critical Enabler 2 – Skilled Workforce**

CCAA acknowledges that there are significant shortages of skilled drivers and highlights the importance of ensuring that the freight industry is appropriately skilled to face future challenges and meet business needs.

A “step change” is urgently needed by governments at both state and federal levels, together with industry, to ramp up skilled migration programs and efforts from overseas, as well as skilling and upskilling initiatives. Otherwise, the capacity to support infrastructure and construction programs will be severely diminished.

Thank you for the opportunity to comment on the proposed Queensland Freight Action Plan 2023-2025. To discuss further, please contact me on 0439 955 020 or [aaron.johnstone@ccaa.com.au](mailto:aaron.johnstone@ccaa.com.au)

Yours sincerely



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