

25 November 2020

WARR Act Review
Department of Water and Environmental Regulation
Locked Bag 10,
JOONDALUP DC WA 6919

Via: warractreviewqueries@dwer.wa.gov.au

SUBJECT: REVIEW OF THE WASTE AVOIDANCE AND RESOURCE RECOVERY ACT 2007 DISCUSSION PAPER

Cement Concrete & Aggregates Australia (CCA) welcomes the opportunity to provide a submission to the Department of Water and Environmental Regulation on their review of the *Waste Avoidance and Resource Recovery Act 2007* (WARR Act) Discussion Paper.

CCA 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 Victoria. For your information, a list of CCA Western Australia's members is provided in Appendix 1.

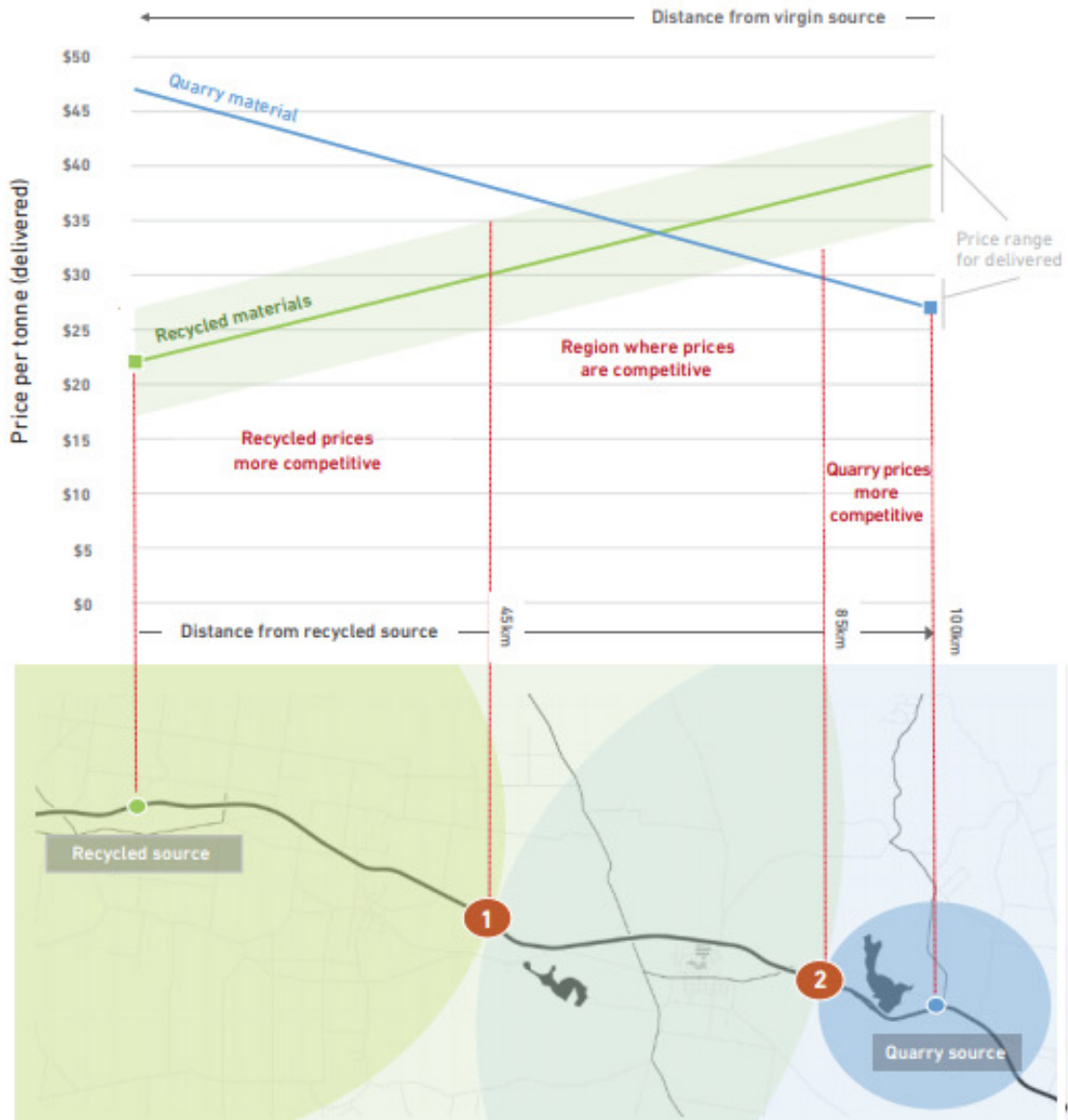
CCA supports the establishment of a commercially viable circular economy where the regulatory barriers to reuse/recycle material are removed and the system incentivizes innovation and the commercial application of previously classified waste streams.

CCA makes the following comments on the proposed WARR Act Discussion Paper:

- Section 8.3 Proposed Reforms - Support increased penalties for illegal waste disposal. This affects many quarry sites which are located in the outer metro area and have vacant bush land surrounding which is often a target for illegal dumping.
- Section 9 Other - Review of the WARR Act needs to address current market constraints with use of recycled products by aiming to develop guidance/standards/state-wide targets for the use of recycled materials in the building and infrastructure sectors. This would further encourage the use of recycled products on a fit for purpose basis.
- CCA does not support the setting of mandatory project specific quotas for the use of recycled materials as this can often lead to perverse outcomes. For example, if the source of recycled materials is a greater distance from market compared to virgin construction materials, then virgin materials can generally be delivered to site at a lower per unit cost and with fewer greenhouse gas emissions and lower environmental impact than the recycled alternative. This is well illustrated in Figure 1.

Figure 1 - The impact of haulage on total cost of pavement construction

The haulage cost component for both quarry materials and recycled products can be seen by the change in price as a project location (points 1 and 2 on the diagram) moves closer or further away from each material source. Note: actual distances quoted in the diagram should be taken as indicative rather than specific.



Copied from: Recycled products in pavement construction. A business case for councils to use local recycled products in pavement construction. Sustainability Victoria. September 2015.

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 lower infrastructure costs.

The provision of affordable heavy construction materials helps to facilitate the delivery of affordable infrastructure, contributing to the completion of Western Australia's infrastructure projects within budget.

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 rebuild Western Australia's post COVID 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

APPENDIX 1

CEMENT CONCRETE & AGGREGATES AUSTRALIA

MEMBERSHIP

FOUNDATION MEMBERS

 <p>ADBRI Adbri Limited</p>	 <p>BORAL Boral Australia</p>	 <p>CEMENT AUSTRALIA Cement Australia Pty Ltd</p>
 <p>Hanson HEIDELBERGCEMENTGroup Hanson Australia Pty Ltd</p>		 <p>Holcim Holcim (Australia) Pty Ltd</p>

WESTERN AUSTRALIA

ORDINARY MEMBERS

<p>Flyash Australia Pty Ltd Fulton Hogan Industries Lime Industries Pty Ltd</p>	<p>Pilatti Bros Transport Ransberg Pty Ltd T/a WA Premix and WA Bluemetal Urban Resources Pty Ltd</p>	
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ASSOCIATE MEMBERS

<p>Concrete Colour Systems Concrete Waterproofing Manufacturing Pty Ltd T/a Xypex Australia</p>	<p>GCP Applied Technologies Sika Australia Pty Ltd Westrac</p>	
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