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QUEENSLAND'S WASTE STRATEGY 2010 – 2020: CCAA SUBMISSION

Cement Concrete & Aggregates Australia (CCAA) is the peak industry body for the heavy construction materials industry in Australia including cement, pre-mixed concrete and extractive industries. We welcome the opportunity to make a submission to the discussion paper *Queensland's Waste Strategy 2010 – 2010*.

The industries represented by CCAA have a significant stake in relation to waste management and resource recovery, and is keen to be closely involved in government reform in this area.

Overall comments on draft strategy

CCAA is supportive of the Queensland Government's efforts to improve waste and resource management in the state – to avoid and reuse waste, to optimise recovery and recycling, to develop sustainable waste industries and jobs, and to foster strategic partnerships with industry and the community. CCAA supports the Queensland Government taking an integrated approach to the issue.

CCAA supports the preparation of a new legislative framework to implement the Queensland Government's proposed policy approach to waste management.

We encourage the Queensland Government to consult widely with the industry in the development of legislative instruments – including the CCAA - to ensure that the resultant legislation is appropriately robust, efficient, and does not have unintended negative consequences.

The manufacturing and production processes for cement, concrete and aggregates rely heavily on the re-use of waste materials, and this has increased in recent years. This includes:

- **An increasing use of by-products from other industries (such as blast furnace slag from steel production and fly ash from electricity generation) in the cement manufacturing process.** The use of fly ash as a supplementary cementitious material is a very effective use of a waste material, and reduces both the fuel and raw materials required per tonne of cement produced. *Fly ash* is used as a supplementary input to making clinker, as well as an addition to ground clinker, thereby replacing some of the clinker required for cement production. This has the effect of reducing the thermal energy requirements at the cement plant. *Blast Furnace Slag*, a non-metallic by-product derived from silicates and alumino-silicates that are created in the production of iron in a blast furnace and is generally incorporated as an addition to ground clinker in the production of blended cements. As a result, it replaces some of the clinker required for cement production, resulting in decreasing the thermal energy requirements at a cement plant.

- **Reusing waste in the production of recycled construction materials.** For example, some quarries utilise concrete return concrete waste for recycled quarry products, thus preserving primary resources.
- **Water recycling at quarries** - Water storage reservoirs at many quarries allows water to be reused for dust washing and suppression. Similarly, rainwater is harvested from water tanks at many of our concrete plants and then redistributed for use in other parts of the plant.

CCAA became a signatory to the National Packaging Covenant in September 2008 on behalf of its members to coordinate the industry's activities in reducing waste from packaging of bagged cement and related dry mixed concrete products. The net effect of these actions will be a reduction in the packaging waste from this industry.

Proposed waste levy

Compared to other industries, the cement, concrete and extractive industries are not significant generators of waste that would be captured through an industry waste levy such as that outlined in the discussion paper.

As outlined above, the waste that is generated in the industry are often recycled for use in other production processes within the industry. Further, by-products of other manufacturing processes outside the industry (eg power generation, steel production) are used to supplement manufacturing processes in the cement industry.

Notwithstanding, some of our members do have concerns about the implications of a waste levy in cases where products need to be inadvertently taken to landfill sites. For example, if a load of pre-mixed concrete is returned from a customer and cannot be recycled, a landfill levy of \$35 a tonne is a significant component of the actual cost of production – approximately a third.

CCAA members are also keen to ensure that the revenue raised as part of an industry waste levy is returned to recycling and waste reduction initiatives – not to consolidated government revenue.

Meeting future infrastructure needs

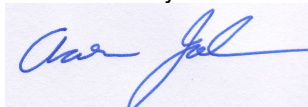
The discussion paper notes that the current location of Queensland's existing processing and recycling infrastructure poses challenges in transporting material for recycling from regional areas, and that regional plans will play an important role in identifying potentially suitable areas to establish waste and resource management precincts for infrastructure.

On this, CCAA believes that there should be acknowledgement that either existing quarries (Key Resource Areas) with 'exhausted' areas, or quarries that are fully exhausted of reserves, could be logically regarded as the most appropriate locations for new landfills & recycling / resource recovery centres, should the market conditions be favourable and impacts on the external environment be manageable.

The potential suitability for these end uses should be nominated in the State-wide planning framework (including the Regional Waste Infrastructure Plans) and provided for in any new legislative framework to implement the Queensland Government's proposed policy approach to waste management.

Thank you again for the opportunity to provide a submission to the discussion paper. To discuss our submission further, please contact me on 3227 5210 or email aaron.johnstone@ccaa.com.au

Yours sincerely



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