

25 October 2021

Native Vegetation Strategy  
Department of Water and Environmental Regulation  
Locked Bag 10  
Joondalup DC WA 6919

Via Email: [nvs@dwer.wa.gov.au](mailto:nvs@dwer.wa.gov.au)

**SUBJECT: CONSULTATION DRAFT. NATIVE VEGETATION POLICY FOR WESTERN AUSTRALIA**

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to comments on the consultation draft of the native vegetation draft for Western Australia.

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. For your information, a list of CCAA members in Western Australia is provided in Appendix 1.

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 recognises the importance of a robust native vegetation policy contributing to improved biodiversity outcomes for Western Australia. CCAA members look forward to the improved biodiversity outcomes at their operational sites being recognised and supported by this strategy.

CCAA **recommends** the draft native vegetation strategy aligns with the CCAA national biodiversity strategy released in 2020, *Enhancing Australia's Biodiversity, Extractive Industry Priorities* that accompanies this submission. The strategy identifies the following priority actions:

- Stronger biodiversity outcomes - taking into account the work of extractive industry that has positively contributed to an increase in biodiversity and environmental outcomes
- Proportionate and risk based regulatory framework and environmental conditions for planning approvals that are not retrospective
- Consistency, clarity and harmonisation of policy and legislation across different levels of government to reduce duplication and regulatory burden
- A regulatory framework that recognises industry improvements, encourages good practices, and focuses compliance on higher risk operators, or those with a history of poor performance

- Allow for offsets to be staged over the life of the quarry as the site is progressively rehabilitated, completing onsite rehabilitation to an appropriate standard that realises biodiversity benefits to be realised across the site, throughout its lifetime
- Biodiversity credits are generated from management actions that improve biodiversity values and are used to offset the loss of biodiversity values. Where possible, they should be carried out in accordance with a bio banking agreement.

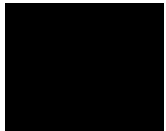
CCAA supports:

- An improved offset system, but DWER will need to continue to consult with industry to ensure the system delivers on the promised benefits.
- Increased data gathering as a matter of priority, so long as data is publicly available and contributes to a more informed, streamlined decision making process
- The bioregional perspective of the draft policy
- The recognition of revegetation of quarry sites within the mitigation hierarchy of avoid, minimise then rehabilitate, before offsets are considered. This provides an incentive for operators to progressively rehabilitate and revegetate during the staged development of quarries and has contributed to improved management of the vegetation impacts of quarries on the Darling Scarp and other numerous examples of excellent revegetation of hard rock, sand, and limestone quarries.

Western Australia's economy 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.

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

Yours sincerely








**State Director Western Australia**

## APPENDIX 1

### CEMENT CONCRETE & AGGREGATES AUSTRALIA

#### MEMBERSHIP

##### FOUNDATION MEMBERS

 <b>ADBRI</b> Adbri Limited	 Boral Australia	 Cement Australia Pty Ltd
 Hanson Australia Pty Ltd	 Holcim (Australia) Pty Ltd	

##### WESTERN AUSTRALIA

##### ORDINARY MEMBERS

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

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