

26 April 2022

Ms. Sally Munk
Principal Planning Officer, Industry Assessments, Development Assessment
Department of Premier & Cabinet
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Sally,

Boral Cement Works Modification (DA401-11-2002-i-Mod-14)

Thank you for your letter of 12 April notifying CCAA of Boral's Cement Works Modification application.

By way of background, CCAA is the national peak body representing companies involved in the production and supply of cement, concrete, and aggregates, collectively known as the heavy construction material sector. Our members supply more than 90% of these products used in Government infrastructure projects, whether that be roads, schools, or hospitals in addition to supplying these materials to support the commercial construction and housing sectors.

Cement is an indispensable material to produce concrete. After water, concrete (including cement) is the most used material in the world and will continue to be essential in supporting our modern way of life and meeting the aspirations of future generations.

Our industry recognises that cement manufacturing is associated with an inevitable demand for energy and CO₂ emissions, which is due to the physical and chemical characteristics of the cement production process. The emissions from cement manufacturing currently account for 6-7 per cent of global CO₂ emissions and approximately 1 per cent of Australia's overall emissions profile.

Our industry accepts that it must play its part in reducing greenhouse gas emissions and as a result, announced late last year its ambition to reduce its CO₂ footprint and deliver society with net-zero carbon concrete by 2050. The [Climate Ambition Statement](#) commits the industry to working across the value chain to deliver this in a circular economy, whole of life context to support a sustainable built environment.

This has been backed up by a new independent report developed by VDZ titled [Decarbonisation Pathways for the Australian Cement and Concrete Sector](#). The report identifies eight critical pathways for decarbonisation of cement and concrete construction. Critically it includes displacing the use of fossil fuels such as coal with alternate fuels in the production of cement clinker.

As you are aware, the NSW Government has adopted a Net Zero Plan objective to deliver a 50% cut in CO₂ emissions by 2030 on the way to achieving net zero emissions by 2050. On page 25 of the Plan, it states:

The NSW Government will also work to improve transparency in the construction supply chain and grow the market for sustainable building materials by:

- *supporting industry led targets and certification schemes for low emissions building materials, such as concrete and aluminium*
- *embedding sustainable building material standards and targets into the design and construction of major NSW Government infrastructure projects*
- ***leading a national strategy to achieve net zero embodied carbon in building materials, through mechanisms such as the National Construction Code and the Green Star Rating System***
- *working with large developers and infrastructure providers to drive their use of low emissions materials in procurement processes.*

These measures will allow the building materials industry to meet increasing demand for low emissions products and allow NSW building suppliers to maintain a competitive advantage against overseas imports.

The increased use of Solid Waste Derived Fuels (SWDFs) is a central element of Boral's proposal to undertake the proposed works. This is a critically important initiative to offset the use of fossil fuels for kiln heating and in reducing the carbon emissions from the manufacture of cement. As the only manufacturer of cement clinker in NSW, this initiative is critical to assisting the construction industry to decarbonise and to assist the Government in achieving the State's emissions reduction objectives as well as their sustainable procurement strategies for infrastructure.

CCAA urges the NSW Government to support this proposal as we work towards the common goal of reaching net zero carbon emissions by 2050 and commends Boral for this initiative.

Should you wish to discuss this submission further, I can be contacted on jason.kuchel@ccaa.com.au or on 0448 848 848.

Yours sincerely,



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