



22 December 2011

Mr Rob Hansen - Research Director
Environment, Agriculture, Environment, Resources and Energy Committee
Parliament House
George Street
BRISBANE QLD 4000

Dear Rob

Review of the Environmental Protection (Greentape Reduction) and Other Legislation Amendment Bill 2011 – CCAA Submission

Cement Concrete & Aggregates Australia (CCAA) is the peak industry body for the \$7 billion-a-year heavy construction materials industry in Australia. Our members are involved in the extraction and processing of quarry products, as well as the production and supply of cement, pre-mixed concrete and supplementary materials. A list of members in Queensland is provided at Annexure 1.

We welcome the opportunity to make a submission to the Environment, Agriculture, Resources and Energy Committee (EAREC) inquiry into this Bill.

Overall comments on the Bill

We are very supportive of the Bill's objective to simplify and improve the licensing processes under the *Environmental Protection Act 1994*, whilst maintaining environmental outcomes.

In particular:

- We strongly support the introduction of a **licensing model that clearly reflects the environmental risk** of a particular Environmentally Relevant Activity (ERA), and are very supportive of increased efficiency for the operational approvals process.
- We agree with the flexibility of being able to **amend operational approvals without the need to change the development approval**, and the ability for an operator licence to cover multiple sites.
- CCAA is also supportive of a system which will reduce the number of annual returns and payments. With regards to the **transfer of an operator license**, in general, industry supports a licence which is attached to the operator rather than the land on which the business is based. The industry believes that this initiative could provide greater efficiency in transferring licences, and takes into account businesses with complex and varying ownership structures. However, any changes should be accompanied by clear guidance and high levels of support and resources for business to transfer current licenses to the new arrangements, including any clear articulation of any transitional arrangements. There also must be a clear understanding of what standard conditions will apply to operator licence.
- With regards to the initiative to **amend operational approvals without having to amend development approvals**, CCAA members are supportive of this change, provided there are effective and efficient ways to amend any conditions attached to the approval.

- In relation to the introduction of an **amalgamated corporate authority**, CCAA believes that the initiative is positive in relation to the ability to make a single annual return in relation to multiple sites, and the potential to significantly reduce the overall number of licences and registrations.
- CCAA strongly endorses the initiative to **streamline and clarify information requirements**, including the provision of clear guidance on the information required and a reduction in the amount of information to be assessed. CCAA members note that clear information requests would be especially beneficial where the approval process has been delayed.
- In relation to use of **third party certifiers** to assess development applications, CCAA in general supports the use of independent and suitably qualified third parties in appropriate situations, provided there are suitable processes for the determination of certifiers. This appears to be addressed in the Bill. However, potentially, third party certifiers may result in additional costs for industry, especially the costs of retaining third party consultants where a development approval is delayed. Additional issues associated with use of third party certifiers include a possible loss of corporate knowledge at DERM if third party certifiers undertake the majority of assessments and increased conditions being imposed due to third party certifier liability responsibilities. CCAA members also note that reduced application costs should apply where third party certifiers are engaged as DERM is not providing resources to undertake the assessment.
- In relation to the **prioritisation of information required with the application**. CCAA is very supportive of technical and supporting information (which is not critical to the application decision) being supplied after approval has been granted. CCAA members note that such prioritisation of information would assist in reducing application processing delays and would like to see this initiative also implemented by local governments.

Additional Comments

As outlined above, CCAA strongly supports the Bill.

However, we also strongly urge that sufficient resources and planning is devoted to the implementation of the Bill, and to be complemented by other improvements in DERM's business processes and customer interfaces so that there is a greater "one-stop-shop" approach in relation to DERM-business interactions.

We would strongly urge that there is continued **close involvement and engagement of DERM regional staff and local government authorities** (as well as industry) in the further development and roll-out of the reforms. This is vital in ensuring that the reforms are practically designed, properly communicated and have broad stakeholder support.

We would also urge that close attention be given to the structure and design of **reform guidance material** to ensure license holders can clearly understand the implications of the proposed changes and can properly plan for any changes.

In summary, we welcome the opportunity to comment on the Bill, and would welcome the opportunity to elaborate on our comments at a public hearing.

To discuss further, please contact me on 3227 5210 or email aaron.johnstone@ccaa.com.au

Yours sincerely



Aaron Johnstone
State Director – Queensland

MEMBERSHIP (at November 2011)

FOUNDATION MEMBERS

 <i>Adelaide Brighton Ltd</i>	 Boral Construction Materials	 Boral Cement Limited
 Cement Australia Pty Ltd	 Hanson Australia Pty Ltd	 Holcim (Aust) Pty Ltd

ORDINARY MEMBERS

<p>Aidan J Graham Pty Ltd Alsafe Pre-Mix Concrete Pty Ltd Axedale Sands & Gravel Barossa Quarries Pty Ltd Barro Group Benedict Sand & Gravel Besmaw Pty Ltd BIS Industries Limited T/A BIS Industrial Logistics Bowen Tug & Barge Pty Ltd Brisbane City Council T/A Bracalba Quarries Broadway & Frame Premix Concrete Pty Ltd Byrne Bros Pty Ltd Clare Quarry Pty Ltd Clay & Mineral Sales Pty Ltd Cleary Bros (Bombo) Pty Ltd Concrete 4 Goulburn Concrete Taxi Pty Ltd Concite Pty Ltd CSR PGH Bricks Davalan Concrete Pty Ltd D K Quarries Pty Ltd Elvin Group Pty Ltd Entire Concrete Pty Ltd</p>	<p>Eziway Concrete (T/as T & M Lynch Pty Ltd) Fulton Hogan Construction Pty Ltd Gaspersic Contracting Pty Ltd Glenella Quarry Pty Ltd Handycrete Concrete Pty Ltd HBMI Pty Ltd H B Resources Pty Ltd Hillview Quarries Pty Ltd Hymix Australia Pty Ltd Lime Industries Pty Ltd Independent Cement & Lime Pty Ltd Lloyd's North Pty Ltd Mackay Sand and Gravel Sales Mantina Quarries Metromix Concrete Pty Ltd MSD Construction Pty Ltd MSP Group Pty Ltd Mount Marrow Blue Metal Quarries Pty Ltd Neilsen's Quality Gravels Pty Ltd Nucrush Pty Ltd Oswald Quarries Pty Ltd Premix Concrete Pty Ltd</p>	<p>Parkes Ready Mixed Concrete Pty Ltd Penrice Soda Products Permian Resources Pty Ltd Premier Resources T/A Hy-Tec Industries Pty Ltd Ransberg Pty Ltd T/a WA Premix and WA Bluemetal RNB Trading Pty Ltd Riverside Industrial Sands Pty Ltd Rocla Pty Ltd Santos Ready Mixed Concrete Pty Ltd Sloans Sands Pty Ltd Southern Pacific Sands Pty L td Southern Quarries Pty Ltd Stornoway Quarrying Stornoway Hewitt Pty Ltd Sunstate Cement Ltd Techcon Resources Pty Ltd The Concrete Yard Pty Ltd T/as Queanbeyan Pre-Mix Concrete Treloar Transport Urban Resources Pty Ltd Wagner Investments Pty Ltd Western Suburbs Concrete Zanows Sand and Gravel</p>
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ASSOCIATE MEMBERS

<p>Astec Australia Pty Ltd BASF Construction Chemicals Australia Pty Ltd Bulkquip Pty Ltd Concrete Colour Systems Concrete Waterproofing</p>	<p>Manufacturing Pty Ltd T/a Xypex Australia Fieldwicks Crushing & Screening Grace Construction Products Sika Australia Pty Ltd</p>	<p>WAM Australia Westrac</p>
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