

08 February 2022

EPA

Via: <https://engage.vic.gov.au/new-draft-guideline-managing-greenhouse-gas-emissions>

Dear Sir/Madam

## **EPA GUIDELINE FOR MANAGING GREENHOUSE GAS EMISSIONS**

### **About CMPA**

CMPA is the premier representative body for the Victorian earth resources industry. It represents a broad spectrum of those involved in construction material processing businesses and has a membership base consisting of over 200 quarries across the industry. Together, these members employ approximately 1500 Victorians which underpins the construction industry of almost 240,000 employees (<https://liveinmelbourne.vic.gov.au/connect/victorian-industries/transport-defence-and-construction>).

CMPA members are typically small to medium sized family and private businesses, local government and utility providers. Many are regionally based employers and service local construction, infrastructure and road maintenance needs. The extractives sector is a key pillar within the construction industry underpinning the growth and economic development of Victoria through supply of the construction materials.

In 2020/21, the sector supplied approximately 68.5 million tonnes (see Figure 1) of construction materials to the market, at a value of approximately \$1B directly supporting Victoria's \$80B Big Build (<https://bigbuild.vic.gov.au/about>) and the estimated 1.6M new homes required by 2050 (<https://earthresources.vic.gov.au/geology-exploration/industry-investment/joint-ministerial-statement-on-extractive-resources>). Small to medium quarries account for approximately half of this production and is submitted to be a vital industry supporting the ongoing economic prosperity of Victorians.

The CMPA supports the principle of responsible, balanced legislation that is in the best interests of the State of Victoria and Australia including the protection of resources that enable extraction of resources that is cost efficient to market and to the Victorian taxpayer who is ultimately the end consumer and beneficiary of that resource.

## About the CMPA

The CMPA Rules contain the following purposes of the Association which are to:

- (i) conduct its affairs with honesty and integrity;
- (ii) demonstrate its commitment to the:
  - viability of the Industry;
  - protection of the environment;
  - community in which it exists;
- (iii) vigorously pursue with government and others issues of widespread concern to members;
- (iv) demonstrate leadership and a sense of direction for the Industry;
- (v) act as a resource and provide support to its members through the delivery of cost savings and assistance in complying with legal obligations;
- (vi) foster unity and cooperation between members and others;
- (vii) promote continuous improvement through education, training and other activities.

As per purpose (vii) through the development of Guidelines, Checklists and Reference Manuals such as:

Guidelines	Checklists	Reference Manuals	Community publications
Noise Management	Excavator	Work Safely	Quarries Build Communities <a href="https://cmpavic.asn.au/community/">https://cmpavic.asn.au/community/</a>
Dust Management	Front End Loader	Conduct Laboratory-based tests	
Blast Management	Mobile Plant	Conduct Screening	
Bushfire Response	On Road Tip Truck	Service & Maintain Crushers	
Slimes Management	Watercart	Conduct Crushing	
Traffic Management	Haul Truck	Collect Routine Site Samples	
Working Safely with Geotechnical Risk in Quarries		Combined Crushing & Screening	

The Guidelines are made available **free to the community** on <https://cmpavic.asn.au/publications/support-sheets/>

The above CMPA profile highlights the seriousness with which the extractive industry undertakes its responsibilities including to maintain community confidence and a social license to operate.

## Discussion

### General:

The Guideline is impractical for small to medium business being 37 pages long with numerous references to other publications (5 pages of references at the end of the Guideline and references interspersed throughout the body of the document).

A quick search on the internet yielded simpler versions for measuring and reporting on GHG emissions:

- United Kingdom Department for Environment Food & Rural Affairs  
Small Business User Guide: Guidance on how to measure and report your greenhouse gas emissions (**7 pages**)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69494/pb13310-ghg-small-business-guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69494/pb13310-ghg-small-business-guide.pdf)
- United States Environment Protection Agency  
Guide to Greenhouse Gas Management for Small Business & Low Emitters (**19 pages**)  
Simplified GHG emissions calculator  
Simplified Inventory Management Plan Form  
<https://www.epa.gov/climateleadership/ghg-inventory-guidance-low-emitters>

It is unclear from reading the Guideline whether:

- It is mandatory;
- The GHG emissions data is to be submitted to the EPA.

### Specific

Page number	Guideline	CMPA comments
p.6	<i>The guideline will help you better understand how to identify and assess (for example, estimate, calculate) and manage (through implementing controls to minimise the risk so far as reasonably practicable) your direct and indirect GHG emissions</i>	If the intent is to encourage the reduction or elimination of direct or indirect Greenhouse Gas (GHG) emissions, it has missed its mark.
p.10	<i>emissions produced from manufacturing processes, such as from the manufacture of cement</i>	Cement is no longer manufactured in Victoria
p.18	<i>using renewable energy</i>	Even renewable energy has indirect GHGs emissions for example manufacture, commissioning, decommissioning and disposal of wind turbines/solar panels


### Submission

- CMPA supports the reduction or elimination of direct or indirect GHG emissions where reasonably practicable.

- Whilst it is assumed that the intent of the Guideline **is not** for small/medium businesses to engage expensive consultants to fulfill their obligations for the General Environmental Duty and GHG emissions, the Guideline recommends third-party independent verification.
- Clarity is required on whether the requirements in the Guideline are mandatory and where (or whether) the data collected on GHG emissions is to be submitted.
- The Guideline should be simplified, amended and/or separated to include a Template and/or Checklist for small businesses that may be more readily audited or revisited.
- The CMPA would be interested to work with the EPA to develop such a Guideline tailored to small/medium quarries including construction and demolition waste recyclers.

I would be pleased to discuss this submission with you further. Please contact me on 0434 692 618 or via email at [elizabeth.gibson@cmpavic.asn.au](mailto:elizabeth.gibson@cmpavic.asn.au) in respect of any matter.

Yours sincerely



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