

9 August 2021

To whom it may concern

Via email:

BUILDING A CLIMATE-RESILIENT VICTORIA – ADAPTION ACTION PLANS

The Construction Material Processors Association (CMPA) is dedicated to the representation and service of its Members in the Victorian Earth Resources industry. The CMPA represents a broad spectrum of businesses that extract and process hard rock, gravel, sand, clay, lime, and soil. CMPA members also operate recycling businesses.

CMPA members are typically small to medium sized family and private businesses, local government and utilities. 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 2019/20, the sector supplied 63 million tonnes of construction materials to the market, at a value of approximately \$1.1 billion. Small to medium quarries account for approximately half of this production.

The CMPA supports the principle of responsible, balanced legislation that is in the best interests of the State of Victoria and Australia.

Thank you for the opportunity to comment on the Building a Climate-Resilient Victoria – Adaption Action Plans.

General Comments

- It is apparent that each Adaption Action Plan is written by a different set of authors;
- The importance of construction materials (sand, stone and gravel) did not get a specific mention; and
- There is a key focus on better understanding climate impacts rather than specific obligations.

Specific comments

Page	Built Environment Adaption Action Plan	CMPA comments
p.4	<i>Over the next 5 years, the Built Environment system must strengthen and extend existing climate change responses, build adaptation capacity across government, the private sector and the community, and establish regulatory and other frameworks needed to support long-term transformative action.</i>	It is assumed that any action taken will be dependent on climate change modelling as it changes with time.
p.8	<i>Medium-term objective (2027–31) All institutional organisations and major infrastructure providers have a plan that incorporates climate change adaptation into how they operate across the built environment.</i>	What is meant by the tautology “institutional organisations” and who does it encompass?
p.13	<i>Key Victorian Government participants in the Built Environment system</i>	Need to include Earth Resources DJPR who are responsible for the regulation of the extractive industry that supplies heavy construction materials (sand, stone and gravel) vital for the built environment.
p.22	<i>Urban design features, such as using lighter-coloured surfaces and building materials, are also important, particularly to reduce heat build up and elevated night-time temperatures.</i>	Only place in the AAP where building materials are mentioned. There needs to be a focus on readily accessible supply, close to where being used (reduced carbon footprint), quality, choice and competitive heavy construction materials.
p.22	<i>Ensuring resilient energy infrastructure Continual consideration of system reliability measures is a key consideration as our energy system transitions, and to keep pace with projected increases in summer temperatures.</i>	Energy system reliability is already unreliable and needs to be more than just a consideration for a viable quarry and manufacturing industry.
p.30	<i>3 priority areas and 19 potential future actions</i>	In general, the priority areas and potential future actions have not had costs assigned.

Page	Draft water cycle adaption action plan	CMPA comments
p.10	<i>Cross cutting policy areas</i>	Earth Resources Regulation (DJPR) and Planning (DELWP) are cross cutting policy areas: enable the supply of heavy construction materials vital to water cycle infrastructure.

Summary

Care must be taken when using predictive and apparently worst case scenarios to ensure that the uncertainty around the prediction is well understood.

Numerous reviews have been proposed in the Action Plans leading to a consultant's feast. The costs associated for the reviews have not yet been defined nor detail given of where and how the funds are to be sourced.

The cost to industry and community for the implementation of the Actions needs to be clearly identified.

There is a lack of focus on the impact of the Actions on industry productivity and competitiveness whereby Victoria is leading the change which may give rise to increased costs to industry in comparison to other States and Territories, and internationally.

The impact of COVID-19 pandemic has been mostly ignored such as the decrease in the number of immigrants.

It is very apparent that there are different authors for each report.

Conclusion

A summary report across all the Adaption Action Plans to tie all Actions together would have been useful that incorporated estimated costs for each proposed Action. The extractive industry (construction materials) is vital to each Adaption Action Plan and so the necessity of ensuring replenishment of supply of construction materials needs to be recognised and acted upon.

Yours sincerely



Dr Elizabeth Gibson
General Manager
Tel: 0434 692 618
Email: elizabeth.gibson@cmpavic.asn.au