

Monday, 30 June 2008

Project Director, Land and Biodiversity White Paper  
Department of Sustainability and Environment  
via email: land.whitepaper@dse.vic.gov.au

Dear Sir/Madam

## **RE: LAND AND BIODIVERSITY AT A TIME OF CLIMATE CHANGE**

The Construction Material Processors Association<sup>1</sup> (CMPA) and its members are aware of the importance of maintaining, developing and enhancing our land, seas and waterways.

Since 1966 the extractive industry has been identified with its own Act (Extractive Industries Development Act) having as one of its key objectives the guardianship of native vegetation and being secured through the issuing of Work Authorities. Work Authority holders are required under the Act to manage their constrained<sup>2</sup> construction material resources in a manner that is compatible with the economic, social and environmental objectives of the state.

The current management regime of the state's environmental resources (and we anticipate that presented in the green paper) is forcing our members' out of this industry as a result of:

- No clear, commercially attainable arrangements or outcomes
- Complex interpretations requiring exorbitant legal and consulting fees throughout the site life-cycle for all business sizes
- An inability to consider the positive environmental benefits of accessing construction material resources resulting in large, highly valuable sites being locked up

Our members require the White Paper to:

1. Undergo proper parliamentary evaluation of this management system, giving due consideration to the environmental, social and economic implications. This evaluation must be undertaken by a large, reputable firm with wide experience in the financial implications and cumulative legislative burden upon industry.
2. Encourage more holistic and flexible policies. For instance, there should be facilities to utilise ideas such as taking a balance sheet approach, giving value to the resource on par with vegetation.
3. Recognise the importance to the state and restrictions already placed upon industries, such as ours. That is to say, these operations provide an essential service to the community from a constrained location and return the land in a modified form.

Yours sincerely

Sarah Andrew  
Project Manager

<sup>1</sup> Members extract, process or otherwise work in hard rock, gravel, sand, masonry, clay, lime, soil, gypsum or recycling

<sup>2</sup> Constrained by the resources' location and quality in relation to its distance from its intended market