CEMENT CONCRETE & AGGREGATES AUSTRALIA

8 October 2026

Ms Victoria MacKirdy
Chief Executive Officer
Local Government Association of South Australia
148 Frome Street
Adelaide SA 5000

Support for Concrete Delivery Reforms

Dear Victoria

Cement Concrete & Aggregates Australia (CCAA) is seeking the support of the Local Government Association of South Australia (LGA SA) for two practical reforms that would significantly increase the capacity and productivity of South Australia's concrete supply sector.

CCAA is the voice of Australia's heavy construction materials industry. Our members produce cement, premixed concrete and quarry materials including sand, stone and gravel. These materials are essential to housing, roads, rail, energy, water and other infrastructure across South Australia.

Oxford Economics estimates the cement, concrete and aggregates industry contributes $0.95 billion to South Australia's Gross State Product and supports 4,479 jobs in FY2024–25.

South Australia is experiencing strong demand associated with major infrastructure projects and the delivery of new housing. This is placing increasing pressure on the availability of trucks, heavy vehicle drivers and other construction industry resources.

CCAA has identified two relatively straightforward reforms that could increase concrete delivery capacity using the industry's existing fleet and workforce, while also reducing the number of truck movements required to deliver a given volume of concrete.

1. Local road access for PBS-certified concrete agitators

CCAA is seeking greater access to local roads for concrete agitators certified under the Performance Based Standards (PBS) scheme.

Importantly, CCAA is not seeking broader PBS access to local roads for heavy vehicles generally. The proposed access would apply only to PBS-certified concrete agitator trucks and only where those vehicles need to use local roads for the purpose of delivering concrete to a destination on those roads.

This would include concrete deliveries for:

- residential construction, including house slabs, footings, driveways and other concrete works at homes and residential developments located on local roads; and

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- local government infrastructure, including footpaths, kerbing, drainage, road works and other council infrastructure located on or accessed from local roads.

Concrete is a time-sensitive product that must be transported directly from a batching plant to the location where it is to be placed. Unlike many other heavy vehicle freight movements, an agitator cannot simply deliver its load at an alternative location if the construction site is situated on a local road. Access to that road is therefore an inherent part of supplying the home, development or council infrastructure being constructed.

Most CCAA members already operate under concessional mass limits that enable a five-axle twin-steer concrete agitator to operate at a gross mass of up to 32 tonnes. PBS-approved vehicles can increase this to approximately 35 tonnes, enabling essentially the same vehicle to safely carry a greater volume of concrete.

Depending on vehicle configuration, PBS operation can provide approximately:

- 0.4 cubic metres of additional concrete per load for a twin-steer, dual-rear-axle agitator; and
- 1.25 cubic metres of additional concrete per load for a twin-steer, tri-rear-axle agitator.

This represents a productivity improvement of approximately 12–16 per cent per load.

Across the metropolitan concrete industry, CCAA members estimate that broader PBS access could enable more than 700 additional cubic metres of concrete to be delivered each day using the same number of trucks and drivers.

Importantly for councils and local communities, carrying more concrete on each agitator can mean fewer truck movements to complete the same concrete pour. For a typical residential house slab, the additional carrying capacity can reduce the number of agitator deliveries required by approximately one truck. This also improves productivity for concrete placers and concrete pump operators and reduces pressure on an already constrained heavy vehicle workforce.

Modern PBS-certified vehicles are designed and strictly verified with road friendly requirements such as load sharing suspension that actually reduce the amount of wear and tear on council roads when compared against older non-PBS concrete agitator trucks. This proposed change will support improved productivity for concrete operators which is expected to fast track investment to reduce older, louder, less efficient trucks from your roads to be replaced with new higher productivity, more road and community friendly PBS- certified agitator trucks.

The productivity benefits of PBS-certified concrete agitators also translate directly into lower fuel consumption and emissions per cubic metre of concrete delivered. By carrying a greater volume of concrete on each trip, fewer vehicle movements are required to deliver the same quantity of concrete to a residential or local government project. Depending on the vehicle configuration, load size and delivery task, CCAA estimates that this improved payload efficiency can provide fuel savings of up to 20 per cent for the delivery of a given volume of concrete. Providing PBS-certified concrete agitators with access to local roads would therefore not only improve construction productivity but also reduce fuel use, operating costs, truck movements and associated transport emissions. Importantly, these savings arise

from making each necessary concrete delivery more efficient, rather than increasing the number of heavy vehicles using local streets.

CCAA recognises the important role of councils as road managers and the need to appropriately consider road infrastructure and safety. The proposal is therefore deliberately narrow. It is not a request to open local streets to PBS heavy vehicles generally. It is a request to allow PBS-certified concrete agitators to access local roads where that access is necessary to deliver concrete to homes, developments or local government infrastructure located on those roads.

CCAA would welcome the opportunity to work with LGA SA and its member councils to establish appropriate access conditions and safeguards so that this productivity benefit can be achieved while continuing to protect local road infrastructure and community safety.

2. Allowing concrete pours to commence from 6.00 am

CCAA is also seeking LGA SA's support for greater flexibility to allow concrete pours to commence earlier in the morning, including from 6.00 am where appropriate.

CCAA members collectively estimate that each additional hour of available concrete delivery time could enable approximately 950 additional cubic metres of concrete to be delivered each day.

To put this into context, a typical residential house slab requires approximately 50 cubic metres of concrete. An additional hour of productive operating time therefore represents sufficient industry capacity to supply the equivalent of approximately 19 additional house slabs each day.

Earlier commencement would allow more productive use of trucks, drivers, batching plants, concrete pumps and construction crews. It would also enable a greater proportion of concrete deliveries to occur before peak traffic periods, potentially reducing congestion impacts and improving the efficiency of the metropolitan road network.

CCAA acknowledges the importance of managing construction noise and protecting residential amenity. We are not proposing unrestricted early-morning construction activity. Rather, we believe there is an opportunity to establish a practical and consistent framework that enables concrete pours to commence from 6.00 am.

A practical response to housing and infrastructure demand

Together, these two reforms have the potential to substantially increase the productive capacity of South Australia's existing concrete supply chain without requiring a corresponding increase in trucks, drivers or batching infrastructure.

Importantly, these are measures that could be implemented relatively quickly and would support both the State's housing objectives and its significant infrastructure pipeline.

For PBS access, CCAA's request is specifically limited to concrete agitators undertaking concrete deliveries. We are not advocating for a general expansion of PBS heavy vehicle access to local streets. The objective is simply to enable an appropriately certified concrete agitator to efficiently deliver concrete to a home, development or council infrastructure project that can only be accessed via the local road network.

Given the important role councils play as road managers and planning authorities, a coordinated approach involving local government, the State Government and industry will be essential if these productivity opportunities are to be realised consistently across metropolitan Adelaide.

CCAA would therefore welcome LGA SA's support in principle for these two reforms and the opportunity to work with the LGA, its member councils and the State Government to develop practical and consistent implementation arrangements.

We would welcome the opportunity to meet with you to discuss these proposals and the potential benefits for local government, the construction industry and the broader South Australian economy. Accordingly, our State Director SA, WA & NT, Jason Kuchel can be contacted on jason.kuchel@ccaa.com.au.

Yours sincerely

MICHAEL KILGARIFF
Chief Executive Officer