CEMBUREAU
The European Cement Association

POSITION PAPER

12 December 2023

UNION CERTIFICATION FRAMEWORK FOR CARBON REMOVALS TRILOGUES – CEMBUREAU POSITION

CEMBUREAU (www.cembureau.eu), the European Cement Association, is based in Brussels and is the representative organisation of the cement industry in Europe.

Our 2050 Carbon Neutrality Roadmap published in May 2020 aligns the cement industry's decarbonisation pathway with the EU Green Deal objectives and spans the full value chain, from production of clinker and cement to the use of concrete in the built environment.

Carbon removals are particularly important in this perspective, as they can occur at different stages of the cement and concrete value chain[1]. With regards to the upcoming trilogues, CEMBUREAU believes that it is important to:

1. **Recognise that permanently bound carbon mineralisation amounts to permanent storage**

CEMBUREAU welcomes the recognition by the European Parliament (EP) of mineralisation, which encompasses carbonation in concrete, as a permanent carbon removal.

We recommend using the definition of permanent carbon storage of the EP first reading position which acknowledges both carbon capture and storage of biogenic emissions and enhanced carbonation in concrete:

Article 2 – paragraph 1 – point g (European Parliament)
'permanent carbon storage' means ***an*** activity ***consisting of one or more practices or processes carried out by an operator*** that, under normal circumstances and using appropriate management practices, stores atmospheric or biogenic carbon for several centuries ***through geological storage of CO_2 or permanently bound carbon mineralisation***;

2. **Support the material-neutral definition of carbon storage in products, allowing for a range of carbon removals in construction products**

In addition to the enhanced carbonation of concrete, other construction products like plastics can be used to perform carbon removals and store CO2. CEMBUREAU considers that, provided chemical products are part of a recycling loop, the putting of CO2 in chemicals should be considered as permanent storage[2]. In a recent study, the Vrije Universiteit Brussel looked at the potential of different CCU uses and their durability. A key finding was that CO2 stored in plastics used in buildings holds both considerable potential for CO2 storage, as well as significant storage times.

[1] Please see our position paper on the Commission proposal on the Union certification framework for carbon removals
[2] Please see our position paper on permanence of CO2 storage in products

CEMBUREAU
55 Rue d'Arlon – 1040 Brussels - Tel : +32 2 234 10 11
secretariat@cembureau.eu – www.cembureau.eu

We therefore support the definition of carbon storage in products included in the Council negotiating mandate, which (1) allows for future technical developments and (2) is material neutral and does not limit that category to only one type of material.

Article 2 – paragraph 1 – point I (Council position)

‘carbon storage in products’ means a carbon removal activity that either permanently chemically binds carbon in a product or stores atmospheric and biogenic carbon for several decades in long-lasting products ~~or materials~~;

Contact:

Jean-Baptiste Gomes

Senior Public Affairs Manager

jb.gomes@cembureau.eu