

CEMBUREAU'S FEEDBACK TO THE POLLUTER PAYS PRINCIPLE PUBLIC CONSULTATION.

Brussels, 25/07/2023

CEMBUREAU, the European Cement Association (www.cembureau.eu), welcomes the opportunity to comment on the public consultation to the Polluter Pays Principle initiative.

CEMBUREAU firmly supports the objectives of the European Green Deal and is determined to contribute strongly to the EU's vision for a carbon neutral society by 2050. In 2020, CEMBUREAU published its [Carbon Neutrality Roadmap](#) setting out its ambition to reach net zero greenhouse gas (GHG) emissions along the cement and concrete value chain by 2050, in line with the European Green Deal.

Already today, the European cement industry is reducing its impact on the air pollution through the deployment of a wide range of abatement emissions technologies such as modern dust filtering devices, closed systems for storing, transporting and dosing the raw materials and fuels, on-line emissions analysers and process control optimisation, selective non-catalytic reduction (SNCR) or selective catalytic reduction (SCR) for abatement of NOx emissions, wet scrubbers or lime injection systems in case of high SO2 emissions, chlorine by-pass systems, etc.

In addition to the above, a positive impact on air pollution results from other technologies supporting the decarbonization of the sector, from the development of alternative fuels to replace fossil fuels in heating processes, improved energy efficiency of kilns, low-clinker cements, innovative binders, innovative concrete solutions, up to the development of carbon capture and storage/use technologies where the industry is leading the way through several pilot programmes in Europe.

Each and every cement plant in the EU operates in accordance with a permit granted by the authorities in the Member States following the principles and provisions of the Industrial Emissions Directive (IED). This Directive specifies how to control emissions from industrial sources other than CO₂, through the application of Best Available Techniques (BAT) which are defined in BAT Reference Documents (BREFs).

CEMBUREAU believes that the IED and the BREFs are delivering environmental performance across Europe because their approach is flexible, focuses on continuous improvements and addresses local environmental issues holistically. The combination of the IED and the BREF-document are the good and efficient "translation" of the polluter pays principle to the industrial community, and we support this. CEMBUREAU firmly believes that more focus should be given on measures to strengthen the implementation of the IED and BREF, rather than creating new legislative requirements.

The European cement industry is a [large user of waste and by-products](#) having used in 2020 approximately 36 million tonnes to replace fuels and raw materials. In the EU, the sector substitutes on average 52% of its fossil fuel thermal energy consumption with secondary materials such as non-recyclable waste or biomass waste. When waste is introduced into the cement kiln to produce clinker (the intermediate product of cement), its organic component provides heat inside the kiln whereas the mineral, non-combustible elements are recycled and become part of the clinker, thanks to what is

called “[co-processing](#)”. Co-processing is a sustainable ecological solution for the treatment of waste, leaving no residue behind, strengthening the circular economy. Moreover, this use of waste fuels and waste biomass fuels are also key for the cement industry to reduce its CO₂ emissions and support our vision to a carbon neutral Europe for 2050. Important to note that the use of alternative fuels in cement industry reduces the dependence on fossil fuels. CEMBUREAU considers that the valuable contribution of the cement sector to the waste management value chain through co-processing should be seen as a contributor to the Polluters Pays Principle initiative.

Finally, CEMBUREAU underlines the recognition in the European Green Deal that the cement industry is indispensable to Europe’s economy, as it supplies several key value chains. As key construction materials for renewable energy equipment, sustainable buildings and mass transit transport, cement and concrete indeed offer the opportunity to accelerate the creation of a carbon-neutral Europe. With the above in mind, we find it is essential that the legislative actions create a regulatory environment which incentivises investment towards supporting the European Green Deal ambitions, taking into account the whole life cycle of the application that manufactured products provide, and provides long-term legal certainty and fosters the industry’s global competitiveness.

CEMBUREAU looks forward to being part of the discussions on the EU Polluter Pays Principle initiative.
