

**CEMBUREAU'S RESPONSE TO THE ROADMAP ON THE "EUROPEAN CLIMATE LAW
– ACHIEVING CLIMATE NEUTRALITY BY 2050"**

CEMBUREAU, the European Cement Association, is determined to contribute strongly to the EU's vision for a carbon neutral society by 2050 and supports the objectives of the European Green Deal.

The European cement industry is currently reviewing its 2050 low-carbon roadmap, with the intention to strive for carbon neutrality along the cement and concrete value chain by 2050 (please see our [press release](#)).

In terms of the upcoming European Climate Law, we offer the following comments:

- The draft law should be simple in scope, and be technology neutral. It should not enter into specific sector consideration, but rather set the objective of 2050 carbon neutrality for the European society as a whole. The development of individual decarbonisation policies, including the review of intermediary climate change targets (e.g. 2030 targets) which is to be consulted on later this year, should only come in a second stage.
- The climate law should foster decarbonisation policies based on life-cycle analysis and full value chain approaches, as outlined in the European Green Deal. As recycling and circular economy become critical parts of industrial decarbonisation, having a "full value chain approach" is critical to reach carbon neutrality.
- The objective of carbon neutrality necessitates considerable investments, and will not be met without appropriate political support and an ambitious industrial policy. In this respect, the [Masterplan for a Competitive Transformation of EU Energy-intensive Industries Enabling a Climate-neutral, Circular Economy by 2050](#) contains clear recommendations on how energy-intensive industries can contribute constructively to the development of policies enabling the transition to a climate-neutral economy by 2050.
- Regarding policies which will be developed in the coming years to reach the EU 2050 carbon neutrality objective (e.g. review of 2030 targets), it is critical that these are subject to comprehensive impact assessments. These should include the impact on carbon leakage and the development of policy tools to prevent this.
- The climate law should recognise the role played by negative emissions to reach carbon neutrality. For instance concrete – which is cement's main product – absorbs CO₂ over its lifetime, turning European cities into carbon sinks.
