JOINT LETTER on the Draft Standardisation Request for cement

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Europe must stay committed to an ambitious reform of the cement standards

To: **Ms. Teresa Ribera Rodríguez**, Commissioner VP for Clean, Just and Competitive Transition
Mr. Stéphane Séjourné, Commissioner VP for Prosperity and Industrial Strategy

Cc: **Ms. Kerstin Jorna**, Director-General of DG Grow
Mr. Olivier Guersent, Director-General of DG COMP

EU Member States Representatives at Committee on Standards

Members of European Parliament

Date: 13 May 2025

Dear Commissioner Vice-Presidents,

Building upon our previous letter (October 2024) on the topic, highlighting the need for technology neutral and performance-based standards to allow for fair market access of clean tech innovations, we would like to bring to your attention a worrying U-turn from the most recent European Commission draft proposal.

Cement – together with concrete – is an area where Europe can have a competitive edge globally in the deployment and scaling of low-carbon technologies. However, this requires an urgent updating of European cement standards to facilitate the large-scale market access and uptake of low-carbon innovations. Performance-based and technology-neutral standards are the only ones capable of delivering on this much-needed change.

All 20 signatories were therefore pleased to see a growing political attention on the subject in recent months. Most notable in this regard are the Clean Industrial Deal, the EU High-Level Forum on Standardisation recommendations[1] ; and the Steel and Metal Action Plan which all highlight the need for substantial reforms to today's cement standards. This illustrates that the topic is not only of relevance for innovations in the European cement and concrete industry, but also has wider ramifications for the decarbonisation and competitiveness of the European industry as a whole. Indeed, key sectors (e.g. aluminium, glass, steel, mining) are in urgent need of better cement standards for the valorisation of their by-products, allowing them to transition to more circular business models.

Against this background, we are extremely worried about the most recent proposal from the European Commission which represents a backwards step from February to April which does not reflect the political sense of urgency needed on the topic, nor are in line with previous proposals and assessments:

[1] https://ec.europa.eu/docsroom/documents/62574

- On 24 February 2025, the European Commission put forward a draft standardisation request, proposing the updating of EN 197, the main EU standard for common (Portland) cements (i.e. less limitative regarding accepting some clinker substitutes) ; and the development of a new performance-based standard for alkali-activated cements. In addition, it was explicitly communicated by the Commission[2] that the development of a European Assessment Document (EAD) would be requested from the European Organisation for Technical Assessment (EOTA) for new technologies not in scope of EN 197 (e.g. novel clinker types) to facilitate the placement on the market of these breakthrough technologies.

- On 24 April 2025, the European Commission presented an updated version of the draft standardisation request. Worryingly, it shows a clear intention to **withdraw the standardisation request for alkali-activated cements,** requesting only a technical report on this type of cement which has no added-value, nor potential for addressing market entrance barriers. **Furthermore, the documents lack any explicit commitment from the side of the Commission to adopt an implementing act to request EOTA to develop an EAD for novel cements not in scope of EN 197.**

The above change of position can be attributed to the heavy pressure exerted by the traditional Portland cement industry – most notably through their dominant position in the European Standardisation Committee (CEN) – to water down the scope and ambition of the standardisation request. Most notable in this regard is the explicit refusal of the respective CEN Technical Committee (TC 51) to develop standards for several types of cements based upon unsubstantiated claims about the maturity of the technologies. Not only is such an approach in conflict with the performance-based logic of the Construction Products Regulation (CPR), it also raises questions about compliance with EU competition law.

We, 20 signatories, call upon the European Commission to stay committed to the development of performance-based and technology-neutral cement standards and not backtrack on previous proposals. The forthcoming Industrial Decarbonisation Accelerator Act will be a high-profile failure if market access for low carbon cement remains blocked by the refusal to develop the necessary standards. We urge the Commission to address in a timely manner the following issues[3]:

- **Alkali-activated cements:** We call upon the European Commission to stay committed to the development of a performance-based standard for alkali-activated cements in line with its original proposal. In case CEN continues to refuse accepting such request, we call upon the Commission to draft the standard itself, in line with the relevant provisions in the Construction Products Regulation (art. 6).

- **Novel clinker and cement types:** We call upon the European Commission to (i) adopt an implementing act to mandate EOTA to develop an EAD by 2027 for cements out of scope of the common cement standard (EN 197), (ii) request CEN to develop a performance-based standard for alternative low-carbon cements to be delivered by 2030. Should CEN refuse to accept this request, we call upon the Commission to develop the standard itself.

- **Supplementary cementitious materials:** We call upon the Commission to further reduce compositional restrictions to main European cement standard (EN 197), most notably by lifting

[2] Annex F, CPR acquis Subgroup Cement, CEM Milestone 3 final
[3] Additional background is provided in Annex I below

scope restrictions to those substitutes currently under review in the CEN Sustacem project. Should CEN refuse to accept this request, we call upon the Commission to develop the standard itself.

Cement – with concrete – is the most consumed product on the European internal market. Technology-neutral and performance-based standards are the only way forward to secure the long-term future and competitiveness of our industry and to lead the way in global decarbonisation and circularity.

We remain at your disposal for any further questions.

ALLIANCE for LOW-CARBON CEMENT & CONCRETE

BOND BETER LEEF VOOR DE TOEKOMST MILIEU

CARBONSAI

CARBON MARKET WATCH

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Cleantech for Europe

CLIMATE STRATEGY & PARTNERS

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PANTHEON PERFORMANCE

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ANNEX – Additional background on the key recommendations

Alkali-Activated Cements

According to the Global Cement and Concrete Association (GCCA), alkali-activated materials are a type of cement which have been developed over 50 years ago, offering *"a lower carbon footprint and contributing to a circular economy, using industry by-products as raw material[4]".*

The standardisation request should remain committed to standardising alkali-activated cements, in line with the original Commission draft from February 2025. The most recent proposal from April 2025 to no longer request CEN to deliver a standard, but a technical report on this type of cements is unacceptable. Europe is home to a fast-growing set of alkali-activated cement technologies and players, willing to invest and scale-up on the internal market. These have in common that they often allow the valorisation of byproducts of other key industrial clusters, including aluminium, steel and mining, as such contributing to a European circular economy. In a conservative market like construction, this will only happen through the adoption of a devoted standard.

Requesting CEN to develop a technical report will change nothing to today's market access barrier. Nor has it any added-value given that respected international prestandarisation bodies like RILEM[5] already rigorously assessed this type of cement, concluding that there is an urgent need for regulators to adopt performance-based standards for alkali-activated cements. Such standards have already been successfully developed and used in other parts of the world e.g. UK[6], US[7], Canada[5]. Furthermore, several EU Member States have standards and assessment methods in place/under development (e.g. Belgium, Netherlands) awaiting action at EU level.

We call upon the European Commission to not backtrack on these technologies and stay committed to the development of a performance-based standard for alkali-activated cements. In case CEN continues to refuse accepting such request, we call upon the Commission to draft the standard itself, in line with the relevant provisions in the CPR and Standardisation regulation.

Novel clinker and cement types

According to a recent study conducted by McKinsey & company, *"investment trends and rapid technological advancements have allowed start-ups to disrupt the alternative-cementitious space with low-carbon offerings[8]"*. Several of these novel technologies are already successfully deployed and scaled outside of Europe, most notably in the UK, US and Canada.

The standardisation request should anticipate upon ongoing breakthroughs with regard to the production of alternatives to Portland cement clinker. These technologies have in common that they rely on alternative feedstocks (e.g. calcium-silicate rocks) and/or production methods (e.g. electrochemical production). We acknowledge that these types of cements might not easily fit into the

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[4] GCCA - Alkali activated cements

[5] https://letters.rilem.net/index.php/rilem/article/view/160

[6] PAS 8820:2016, BSI Flex 350 v2, 2024

[7] ASTM C1157 ; ASTM WK86609

[8] https://www.mckinsey.com/industries/engineering-construction-and-building-materials/our-insights/cementing-your-lead-the-cement-industry-in-the-net-zero-transition#/

standard for common cements (EN 197), as it was developed for Portland cements. However, we do not accept that this revokes the need of developing standards for these cement types altogether.

We call upon the European Commission to (i) adopt an implementing act to mandate EOTA to develop an EAD by 2027 for cements out of scope of the common cement standard (EN 197) ; (ii) request CEN to develop a performance-based standard for alternative low-carbon cements to be delivered by 2030. Should CEN refuse to accept this request, we call upon the Commission to develop the standard itself.

Supplementary cementitious materials

A key policy recommendation from the International Energy Agency (IEA) on cement is to *"revise standards and building codes to incentivise the development of low-clinker cements, namely through the adoption of performance-based specification standards, increasing potential investment in research and implementation of new SCMs*[9]*".* The uptake of new SCMs and/or mixture combinations will be a key driver of cement decarbonisation, and several key markets have anticipated already upon this shift with the adoption of new standards.

Therefore, we call upon the European Commission to anticipate upon the proliferation of a wide range of new clinker substitutes and/or mixture combinations in EN 197. In particular, we would like to draw attention to the EU funded Sustacem project[10], tasked to prepare the standardisation of a wide range of promising clinker substitutes. This project came at the explicit request of CEN to accelerate the integration of new SCMs into EN 197. Given that final project outcomes – i.e. technical reports on how to standardise these novel materials – are expected mid-2027, and thus ahead of the deadline for the delivery of the updated version of EN 197, we find it problematic that attempts to include these materials in the draft standardisation request are actively blocked. Motivated by the fact that several of the materials under review are mature (e.g. recycled glass ; mine tailings ; bauxite residues) ; and in compliance with standards on key non-EU markets (e.g. UK, US, Canada), we call for a greater sense of urgency on behalf of the Commission to let them scale on our single market. This is particularly relevant since a large number of the underlying technologies have been developed in Europe on the basis of public funding at EU and Member States level.

We call upon the Commission to pre-empt the outcomes of the Sustacem project by including the different SCMs and constituents listed in the project description within scope of the request. This can be done in such way whereby flexibility is offered to opt-out on including certain SCMs in the final standard upon providing solid scientific evidence as to why this is needed.

[9] https://www.iea.org/energy-system/industry/cement
[10] CEN Sustacem project