

CEMBUREAU FEEDBACK TO THE EUROPEAN COMMISSION'S PUBLIC CONSULTATION ON ENERGY FROM RENEWABLE SOURCES (RED II)

Brussels, 02/02/2021

CEMBUREAU welcomes the opportunity to provide feedback on the Commission public consultation on the revision of Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources (RED II).

CEMBUREAU's 2050 [Carbon Neutrality Roadmap](#), which was published in May 2020, sets out the cement industry's ambition to reach net zero emissions along the cement and concrete value chain by 2050.

Cement, through its main final product concrete, plays a major role in the building of renewable energy infrastructures, as key component of onshore and offshore wind turbines as well as hydroelectric dams. Concrete is also a key construction material for European buildings and can through thermal mass significantly contribute to energy savings and renewables' integration.

Conversely, the cement industry is a significant user of biomass waste and electricity, which will both play an important role in tackling CO2 emissions from the sector.

When it comes to the upcoming revision of the Renewables Directive, CEMBUREAU has the following comments:

1. It is critical that the Directive provides certainty to users of biomass waste

The European cement industry is a large user of waste and by-products utilizing approximately 36 million tonnes per year. In the EU in 2018, the sector substituted on average 48% of its fossil fuel consumption with non-recyclable waste derived fuels, 17% of which were biomass waste derived fuels. The types of biomass waste used in our industry include for instance animal meal, sewage sludge, sawdust, contaminated agricultural products, or wood from construction waste.

Within a cement kiln waste fuels are co-processed utilising the heat value from the waste fuel to substitute fossil fuels and incorporating the ash as a partial replacement of the raw materials, leaving no waste residue. In addition to providing sound solutions for some waste streams and strengthening the circular economy, 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 for a carbon neutral Europe for 2050 (please see our roadmap for more information).

As it is not possible to determine the initial sources of the biomass for many of the waste biomass fuels use in the cement industry, it is not possible to comply with the sustainability and greenhouse gas criteria featured in the current Directive. **Art. 29 (1) recognises these difficulties and clarifies that "biofuels, bioliquids and biomass fuels produced from waste and residues, other than agricultural, aquaculture, fisheries and forestry residues, are required to fulfil only the greenhouse gas emissions saving criteria".** However, the calculation of GHG savings for those waste biomass fuels also requires information that is not accessible in case of waste (compare Annex VI, Part B of RED II). Therefore, it is crucial that the upcoming review provides clarity to users of biomass waste and facilitates their use. In particular, the Directive should exempt biofuels, bioliquids and biomass fuels produced from waste and residues, other than

agricultural, aquaculture, fisheries and forestry residues from the requirement to fulfil the GHG savings criteria in Art. 29 (10).

2. Additional remarks

Achieving climate neutrality by 2050 will require all sectors of industry and civil society to contribute to greenhouse gas (GHG) emission reductions. This will necessitate the continued program of replacing the generation of electricity by fossil fuels with renewable sources, as well as the reduction of GHG emissions from all forms of buildings and from all forms of transport. CEMBUREAU therefore supports the deployment of large amounts of renewable energy at an affordable price for EU industries.

The objective of deeper CO₂ cuts at a 2030 horizon – and of carbon neutrality by 2050 – necessitates considerable investments, and will not be met without appropriate political support. CEMBUREAU's Carbon Neutrality Roadmap makes several recommendations in terms of regulatory frameworks and concrete support measures. Furthermore, the Masterplan for a Competitive Transformation of EU Energy-intensive Industries Enabling a Climate-neutral, Circular Economy by 2050 also contains key recommendations in this respect. Decarbonisation policies based on life-cycle analysis and full value chain approaches, as outlined in the European Green Deal, will be key.

Referring to energy savings in buildings, much of the European building stock will require significant refurbishment to ensure buildings will meet the future needs of society and not just the application of insulation or changing of heating systems. Deep renovation of buildings can be achieved through the re-use of the building structure and the incorporation of thermal mass which allows maximise the use of renewable energy in building (see E3G [study](#)). This will reduce both the heating and more important cooling requirement, and hence GHG emissions in the future. It will enable buildings to be designed for multi-use making them more adaptable and to meet the increased demand for comfort required by society. In this regard, it is crucial to include the concept of structural energy storage in assessing energy performance of buildings. The role of buildings in active demand response needs to be recognized and enhanced in the policy measures, not only through a revision of RED II but also through a revision of the Energy Performance in buildings Directive which currently only looks at passive thermal inertia. There needs to be a growing recognition that buildings are moving from being highly-energy-demanding and unresponsive elements in a system to becoming highly-efficient micro energy-hubs consuming, producing, storing and supplying energy, making the overall system more flexible and efficient.

In addition to hydrogen, Carbon Capture and Use (CCU) will play an important role and infrastructure needs to be coordinated at both an EU and MS level. This will provide a renewable source of carbon for chemical and refining industries for the future, replacing the current dependency of fossil-based feedstocks. Mineralisation and Carbon Capture and Storage (CCS) will also play major roles in reducing GHG emissions in industry (please CEMBUREAU's [position paper](#) on TEN-E revision).

To ensure GHG reductions are made in all sectors of society, adopting targets for reductions in GHG emissions for buildings and transport, providing non regulatory measures to improve awareness, introducing policies to encourage the switch to low carbon or low energy products and for buildings to take a full life cycle approach to ensure energy usage within the working life of the building is taken into account together with the working life and the end-of-life treatment.

CEMBUREAU stands ready to engage with policy-makers throughout the Directive (EU) 2018/2001 revision process.