

CEMBUREAU'S FEEDBACK TO THE EU ACTION PLAN TOWARDS A ZERO POLLUTION AMBITION FOR AIR, WATER AND SOIL

CEMBUREAU, the European Cement Association (www.cembureau.eu), welcomes the opportunity to comment on the EU initiative to establish an Action Plan towards a Zero Pollution Ambition for air, water and soil.

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.

On 12th May 2020, CEMBUREAU published its new [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 NO_x 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.

CEMBUREAU firmly believes that the Action plan on Zero Pollution should be focused on measures to strengthen enforcement and implementation of the existing legislation, as mentioned in the inception impact assessment. Such swift implementation of the existing legislation should be prioritised. As regards the existing acquis, CEMBUREAU is of the opinion that the IED and the BREF's that look into which best available techniques can be implemented at economically acceptable conditions and which is the result of a broad consultation with a variety of stakeholders, still provides a correct regulatory framework. We therefore do not see an immediate need to update this legislation.

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 post-COVID-19 recovery legislative actions create a regulatory environment which incentivises investment towards supporting the Zero Pollution, 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 Action Plan towards a Zero Pollution Ambition to air, water and soil.
