



Consultation response – Single Market Strategy

The [Alliance for Low-Carbon Cement and Concrete](#) (ALCCC) welcomes the opportunity given by the European Commission to provide feedback on the 'Single Market Strategy 2025'. Representing a wide range of frontrunners in the cement and concrete value, we are committed to a net-zero value chain by 2040. Proven and scalable low-carbon solutions exist, yet need to become the norm.

As highlighted in our [policy roadmap for 2024-2029](#), the EU has a crucial role to play in creating a much-needed level-playing field for low-carbon cement and concrete to scale. All too often EU policies are tailored to the likes of traditional carbon intensive cement and concrete, coming at the expense of the competitiveness of our industry as well as the affordability of housing and construction.

As ALCCC, we believe that a strengthened and deepened internal market is crucial for delivering on cement and concrete decarbonisation. More specifically, we urge the EU to prioritise in the forthcoming Single Market Strategy addressing the long-standing issue of product standards hampering the placement and scaling of innovation on the single market. Applied to the cement and concrete sector, major issues exist today with regard to:

- **Violation of principle of technology-neutrality:** mandatory harmonised product standards for cement and concrete, used for affixing the CE mark to construction products as per requirements of the Construction Product Regulation (CPR), fail to provide a level-playing field to new innovations. This stems from the fact that they do not comply with the performance-based approach required by the CPR (art. 1), according to which the CE marking of construction products should happen on the basis of performance requirements, as such offering a technology neutral framework to market actors. However, in the case of cement and concrete, the EU has a long and harmful tradition of using recipe-based standards, tailored to the composition of a predefined set of products, as such hampering innovation and creating market distortions.
- **Absence of harmonised single market:** despite the ambitions of the CPR to remove barriers-to-trade across the single market by offering a single language (through standards) to member states to assess the performance of construction products, the EU has a hugely fragmented internal market for the most consumed man-made material in Europe: concrete. This stems from the fact that some of the most-used concrete standards (EN 206) are not harmonised, offering national standardisation bodies plenty of room to introduce additional requirements to the type of cements and binders allowed to be used in a given national market. In many cases, national concrete standards (and building codes) impose additional barriers to trade as they restrict the use of cements and binders that are compliant with harmonised European standards and/or successfully affixed a CE mark to their product through the voluntary route of the European Organisation for Technical Assessment (EOTA).
- **Carbon accounting of cement and concrete:** the CPR requires the disclosure of environmental information of construction products prior to the placement on the market on the basis of Environmental Product Declaration (EPDs). However, a full EPD is not a widely used practice in many Member States and the CPR requires the disclosure of environmental impacts only in a stepwise approach in the coming 6 years. In addition, different national practices exist with regard to the use of primary vs. secondary data. In order to move to a strong and functioning single market it is imperative to move much faster to a harmonised approach (e.g. in the context of public procurement), building upon a transparent and harmonised European dataset for development of EPDs.