

Feedback SG Concrete, Mortar and Grout - Milestone I

As [Alliance for Low-Carbon Cement and Concrete](#) (ALCCC), we are committed to bring European cements within planetary boundaries, targeting a net zero value chain by 2040. The swift adoption of performance-based cement and concrete standards in Europe is a key priority for the ALCCC. This is much needed to overcome current market entrance barriers, accelerate decarbonisation of cement and concrete and in doing so strengthen the competitiveness of our industry.

Recommendations

We appreciate the work carried out by the European Commission in relation to the CPR acquis SG on Concrete, Mortar and Grout, and welcome the opportunity to provide input on draft Milestone I (subfamily 1 and subfamily 3).

We wish to make the following comments:

- **Subfamilies 1 and 3 are only one part of the equation:** in the absence of a clear perspective offered by the European Commission on subfamily 2 – referring to the future revisions of EN 206 – it remains impossible to make a full assessment of proposals under revision at present. This stems from the fact that EN 206 – and its different national annexes – at present serve as the main application standard of relevance for the market access and uptake of low-carbon innovations. Therefore, we would like to reiterate our [initial input](#) to this process in which we highlight the crucial importance of moving to a harmonised and performance-based concrete standardisation landscape in Europe.
- **Subfamily 1 – table 1:** explicitly include corrosion inhibiting admixtures, motivated by the current ambiguity in the standards as to whether or not these are covered by the relevant hENs.
- **Subfamily 1 – table 2:** include a performance-based standard for SCMs for use in concrete. This is justified by the unprecedented levels of innovation in the market at present, as well as the need to diversify the range of SCMs due to the phase out of BF/BOF steel making and coal-based electricity production. Inspiration can be drawn from the newly adopted ASTM performance-based standard for SCMs for use in concrete. This performance-based standard can co-exist with today's recipe-based standards.
- **Subfamily 1 – table 2:** to better reflect innovations in the market, we advise to change the product "ground limestone" to "ground limestone or other fine calcium carbonates".
- **Subfamily 1 – table 2:** please include biochar in table 2
- **Subfamily 1 – table 2:** develop a standard for alternative binders for use in concrete, including both novel cement types as well as alkali-activated cements. This is a well-established approach (e.g. BSI Flex 350), addressing gaps in scope of upstream standards.
- **Subfamily 1 – table 2:** please include nanomaterials in table 2.
- **Subfamily 1 – table 3:** we consider the list of fibres for concrete reinforcements to be incomplete, missing amongst others natural fibres, carbon fibres and other fibre technologies. We advise to opt for a performance-based standard to fibres for concrete, covering in its scope all existing (and future) fibres.