

## **JOINT LETTER on the Reform of the European Concrete Standard EN 206**

***A harmonised, performance-based EN 206 is the route to market for low-carbon concrete made in the EU***

### **To:**

Mr Stéphane Séjourné, Commission Executive Vice-President for Prosperity and Industrial Strategy

Ms. Teresa Ribera, Commission Executive Vice-President for a Clean, Just and Competitive Transition

### **Cc:**

Ms Kerstin Jorna, Director-General, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW)

CPR Acquis Expert Group and its Sub-Group on Concrete

**Date: 29 July 2026**

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Dear Executive Vice-President Ribera, dear Executive Vice-President Séjourné,

Concrete is, after water, the most consumed product on the European internal market. It is the backbone of the EU's housing, infrastructure, and industrial ambitions. **The next generation of low-carbon concrete made in the EU already exists technically**, but whether it reaches the market at scale depends on the European concrete standard EN 206.

We are writing to support DG GROW using the CPR Acquis process to give the next generation of low-carbon concrete a harmonised, performance-based route to market. European technologies are ready: low(er)-clinker cements, alkali-activated cements, calcined clays, recycled concrete fines, and qualified industrial-by-products from steel, aluminium, glass and mining, amongst others. Cement reform is necessary but not sufficient: even an approved low-carbon cement must be usable in concrete to reach the construction site. EN 206 is the gate.

On March 2026 the European Commission tabled the Industrial Accelerator Act (IAA), introducing a low-carbon requirement for concrete and mortar in public procurement from 1 January 2029. Without a harmonised and performance-based EN 206, that demand will be met under 27 divergent national rules. The procurement mandate only creates a European lead market if a harmonised and performance-based standard lets EU producers supply it. Demand becomes a legal obligation in under three years, but the supply-side route to market depends on a standard that, in its current form, cannot deliver it.

### **The structural problem: EN 206 is not harmonised, nor performance-based**

**Unlike EN 197 for cement, EN 206 is not a harmonised European standard.** The new EN 206-1:2026 and EN 206-2:2026, currently under ratification at CEN/TC 104, function as recommendations only. Each Member State translates them into a national application rules, DIN 1045-2 in Germany, NF EN 206/CN in France, UNI 11104 in Italy, UNE-EN 206 in Spain, and these diverge substantially on which cements, binders, and supplementary cementitious materials are admissible under which exposure classes. **The result is a fragmented internal**

**market:** a low-carbon concrete validated in one Member State commonly faces a fresh, multi-year national approval in the next. Most novel cements have no harmonised route at all to showcase their performance and are pushed into project-by-project national approvals, when they are not simply deployed outside the EU instead.

A low-carbon procurement requirement implemented on top of 27 national rules will not create the lead market the Clean Industrial Deal promises. Cement and concrete are among the most domestically produced, short-haul goods in the European Union; losing this market to imports for lack of a harmonised standard would be a strategic failure.

## **Our call**

We, the undersigned, call on DG GROW to use the CPR Acquis process to deliver three things:

1. **Adopt a standardisation request for a harmonised EN 206 in 2026.** The ongoing process, initiated by DG Grow under the CPR Acquis, is well placed to deliver on this objective. We fully support the efforts taken by the European Commission to strengthen the Single Market for concrete. To ensure that the future standard is fully aligned with technological developments in the market, we believe it is of vital importance to ensure a balanced representation of different stakeholders, in particular clean tech in the development and drafting of the standard.
2. **Make the standard performance-based and open an EU route for novel cements.** Concrete should be assessed on delivered performance (strength, durability per exposure class, environmental impact, production consistency), not legacy recipes. The Equivalent Concrete Performance and Equivalent Performance of Combinations Concepts should be expanded, not narrowed. This is particularly true for those cements outside the scope of EN 197-1 (e.g. alkali-activated, electrochemically produced, mineralised...) which should be offered a simple and harmonised framework. Furthermore, a level-playing field needs to be created for cements and binders which successfully went through the process of voluntary CE marking through the so-called EOTA route.
3. **Sequence EN 206 with the IAA.** Time the standardisation request so the harmonised standard aligns with the IAA timelines. A procurement obligation without a matching market-access standard would be the most visible failure of the Clean Industrial Deal, a demand mandate European producers cannot consistently and lawfully supply.

The low-carbon requirement from 2029 represents real, predictable demand that European concrete producers are well placed to meet. A harmonised, performance-based EN 206 would let them supply that demand across the single market, rather than ceding it to imports. We would welcome the opportunity to support DG GROW, the CPR Acquis Sub-Group on Concrete and CEN/TC 104 in taking this forward.

Yours sincerely,



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