## Cement sector – Public Consultation on criteria

This document sets out the consultation questions we would like you to consider and provides space for your feed-back and comments. Thank you for your participation.

All feedback, along with the responses and clarifications from the TWG, will be made transparent on the final documentation. Names and organisations that provide feedback are kept anonymous.

**Name**:

**Organisation**:

**Email:**

Please return this form **by close of business 23rd April 2022** to [public.consultation@climatebonds.net](mailto:public.consultation@climatebonds.net)

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| **Question** | **Response** |
| 1 – Is the scope of activity appropriate?  Refer to section 2 of the Criteria document and section 4.2 in the Background document. |  |
| 2 – Please comment on the scope of emissions of the criteria, considering whether it is justified, logical and practicable.  Refer to section 3.3.1 in the Criteria document. |  |
| 3 – Is the [Transition Pathway Initiative pathway](https://www.transitionpathwayinitiative.org/sectors/cement) the best to reference? If not, what else should be considered?  Refer to section 3.2 and 3.3 in the Criteria document, and section 4.3.1 in the Background document. |  |
| 4 – When verifying an issuer’s compliance with a pathway, which of these two options is optimal:  a) Take the mid-point threshold of the bond (e.g., year 10 for a 20-year bond) which the plant must meet once at the point of issuance.  b) Demonstrating continued compliance with the pathway thresholds every three years through annual reporting.  See section 3.2.3 in the Criteria document. |  |
| 5 – The Criteria set additional calculations for the pathway thresholds based on the average cement class (as a proxy for clinker quality) produced by a plant / group of plants.  Please comment on this proposed methodology for this criterion, considering whether it is practicable and verifiable, and if the rationale is reasonable.  Refer to section 3.2.3 in the Criteria document and section 4.3.2 in the Background document. |  |
| 6 – For retrofits or installation of measures which reduce emissions, what might be an appropriate threshold that is suitably ambitious yet realistic for best-practice measures in the sector?  For example, would 30-50% reduction be a suitable threshold?  See section 3.2.2 in the Criteria document and section 4.4.1 in the Background document. |  |
| 7 – For the cases where biomass feedstock (as distinct from biogenic components of waste fuels) is used as a fuel source for kilns, are the additional criteria on their production appropriate?  Refer to section 3.2.4 in the Criteria document and section 4.4.7 in the Background document.  Considering the limited land availability for such feedstocks, is there a timeline on when they should no longer be expected to act as an alternative fuel in the cement sector? For example, when more suitable alternative fuels become readily available. |  |
| 8 – Do you agree with the assumptions that underpin the adaptation and resilience requirements? Is there anything else that needs to be considered?  Consider the additional requirements for Quarry Remediation Plans and Biodiversity Management Plans – are there any other significant environmental risks that the checklist does not already cover?  Refer to section 3.4 in the Criteria document and sections 4.7 and 4.8 in the Background Paper. |  |
| 9 – These Criteria will form the basis for certifying whole cement companies. Acknowledging that few, if any, companies will already lie on or below the transition pathway set, there will likely be a grace period where a company must move towards that pathway, through reallocation of capital, new investment, retirement of ineligible plants, etc.  What should that time period be for the cement industry? Bearing in mind the balance between the need for swift transition today, and technological viability and construction / investment cycles. |  |

### Additional comments and feedback

Please provide all other comments on feedback using the format below.

Consider if there are good practices that you are aware of that are not referred to, additional data sources that would be helpful or further suggestions that could be included. Comments below may answer the following example questions:

1. Do the criteria fulfil low carbon aspirations for the Cement sector? If not, please provide reasons and examples
2. Are the assumptions and science underpinning this work robust, and reflect the most appropriate and up-to-date criteria? Please provide examples of how to improve and specific examples if anything is missing.
3. Do you agree with the assumptions that underpin the mitigation requirements? Is there anything else that needs to be considered? Please, provide as much detail or reference relevant scientific studies or other evidence to substantiate your response.

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| Point number | Page number and section description | Comments and action proposed |
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| 2 |  |  |
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