

UNLOCKING LEAD MARKETS FOR LOW-CARBON CEMENT: A LABELLING PROPOSAL BY CEMBUREAU

11 June 2025

To foster the development of lead markets for low-carbon and circular cement products, in respect of the subsidiarity principle, CEMBUREAU:

(1) supports the European Commission, as part of the *Clean Industrial Deal* and in accordance with the Construction Products Regulation, to mandate the disclosure of the Global Warming Potential (GWP) as required by the forthcoming standardisation request for cement.

(2) encourages interested Member states to further develop national labelling schemes aligned with the CEMBUREAU framework for defining low carbon cements, thereby enabling targeted incentives (public procurement) and promoting the uptake of sustainable construction materials.

Context

As part of its [Clean Industrial Deal](#), the European Commission proposes the development of a voluntary carbon intensity label for industrial products. **For cement, this label/GWP disclosure system is expected to be introduced under the Construction Products Regulation (CPR), with a standardisation request to be issued shortly.** The proposal will be further detailed in the upcoming **Industrial Decarbonisation Accelerator Act**, anticipated by the end of 2025.

CEMBUREAU's Position

Through its [Net Zero Roadmap](#), CEMBUREAU has consistently advocated for the **creation of lead markets to accelerate the uptake of low-carbon, and circular products**. CEMBUREAU supports the Commission's view that carbon labelling will help industrial producers **differentiate their products** based on carbon intensity and **access targeted incentives**.

Regulatory Alignment

The proposed labelling system aligns with two recently revised EU regulations aimed at reducing the environmental impact of buildings across their lifecycle:

- ✓ **Construction Products Regulation (CPR):**
 - Makes it **mandatory** to disclose the **Global Warming Potential (GWP)** in the **Declaration of Performance and Conformity** for CE marking.
- ✓ **Energy Performance of Buildings Directive (EPBD):**
 - Works in tandem with the CPR.
 - Requires **Member States** to introduce **limit values** for the **lifecycle GWP** of new buildings.

- From **2028**, these limits will apply to new buildings over **1,000 m²**, and from **2030**, to **all new buildings**.
- Contractors must disclose lifecycle GWP in **Energy Performance Certificates**.

CEMBUREAU's Proposal

Given that simplification of legislation and respect for the subsidiarity principle are central to the European Commission's competitiveness agenda under the Clean Industrial Deal, CEMBUREAU strongly advocates for a practical and efficient governance model. This model should clearly delineate responsibilities across EU and national level to ensure the effective implementation and operation of the labelling scheme.

✓ **EU level:**

- The disclosure the GWP indicator¹ as required by the forthcoming standardisation request for cement.

✓ **National level:**

- **CEMBUREAU has developed a framework for defining low carbon cements (see Annex I), which is based on the internationally accepted International Energy Agency (IEA) low emission production intensity thresholds². This IEA dynamic scheme based on EPDs has already been adapted:**
 - at international level by the Global Cement and Concrete Association (GCCA) and UN's Industrial Development Organisation (UNIDO) Industrial Deep Decarbonisation Initiative (IDDI),
 - at national level by the *Verein Deutscher Zementwerke* as part of a stakeholder process organised by the German Federal Ministry for Economic Affairs and Climate Action (BMWK), which sets thresholds for climate-friendly products (see Annex II).
- **We encourage Member states, who wish to develop a national labelling scheme, to use our framework definition, in line with schemes developed at the international level, with threshold values that consider the national specificities such as the clinker-to-cement ratio, specific GWP limit values and building codes. These voluntary labels can be certified by national certification bodies as it is already the case for CPR requirements at national level.**

✓ **Single Market**

- Free circulation in the Single Market will be enabled thanks to the mandatory disclosure of the GWP indicator as required by the forthcoming standardisation request for cement.

✓ **Market adoption**

- National labels based on the CEMBUREAU framework definition can be used by public and private actors as a technical specification in their procurement practices. They could eventually benefit from fiscal advantages such as lower VAT rates.

¹ When new harmonised standards are adopted according to the revised Construction Products Regulation, the GWP data of the product will be disclosed in the Declaration of Performance and Conformity (DoPC)

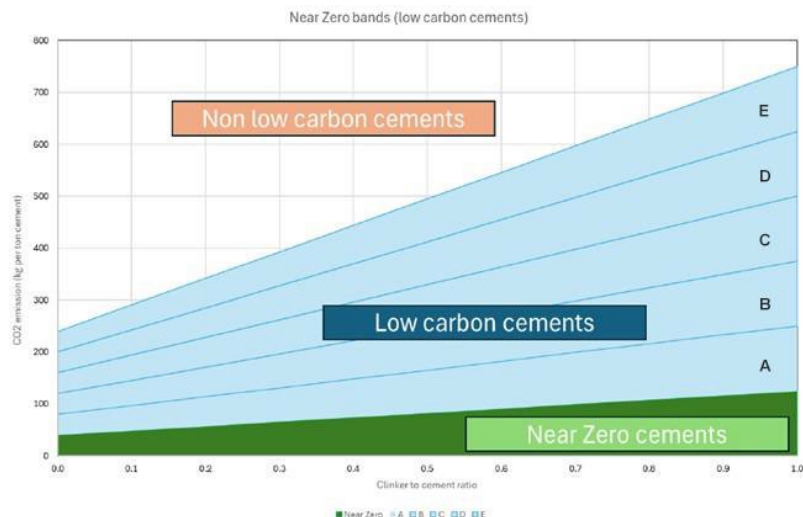
² Page 134 of the report "[Achieving Net Zero Heavy Industry Sectors in G7 Members](#)", IEA May 2022

Annex I – IEA low emission production intensity thresholds proposal from the report “Achieving Net Zero Heavy Industry Sectors in G7 Members”³ adapted by CEMBUREAU to make the framework relevant for the European Union (which can be used by Member States who wish to develop national labels to reflect national specificities)

CEMBUREAU has adapted the IEA’s low-emission production intensity thresholds to reflect the specific conditions of the European cement industry. This adaptation is grounded in the belief that low-carbon cements are a critical enabler of low-carbon concretes, which in turn are essential for delivering low-carbon buildings and infrastructure across Europe.

Acknowledging the diverse conditions across Member States, the classification system is designed to be flexible and adaptable at the national level, considering key local factors such as: The availability of alternative raw materials, access to supplementary cementitious materials (SCMs), the use of biomass and waste-derived fuels.

- Cement types are plotted according to their GWP values against their clinker-to-cement ratios from national Environmental Product Declarations (EPDs) in accordance with EN 15804 and EN 16908 (Product Category Rules for cement).
- Member States can decide to apply a country specific static clinker-to-cement ratio, based on national average values.
- Bands from A – E represent low carbon cements: Band A is associated with the lowest carbon footprint
- Band E, the highest carbon footprint within the low-carbon category.
- The near zero band defined by the IEA⁴ has the lowest carbon footprint, based on full carbon capture projects.
- Cements above Band E are not low carbon⁵.



³ Page 134 of the report “[Achieving Net Zero Heavy Industry Sectors in G7 Members](#)”, IEA May 2022

⁴ From 40 kg CO₂/ton cement for cements with clinker-to-cement at 0% to 125 kg CO₂/ton cement for cements with clinker-to-cement at 100%.
Page 14 of the report “[Achieving Net Zero Heavy Industry Sectors in G7 Members](#)”, IEA May 2022

⁵ The IEA defined maximum level of low carbon cement band for clinker-to-cement ratio of 100%: 750 kg CO₂/ton cement. See Table A.1 page 134 of the report report “[Achieving Net Zero Heavy Industry Sectors in G7 Members](#)”, IEA May 2022

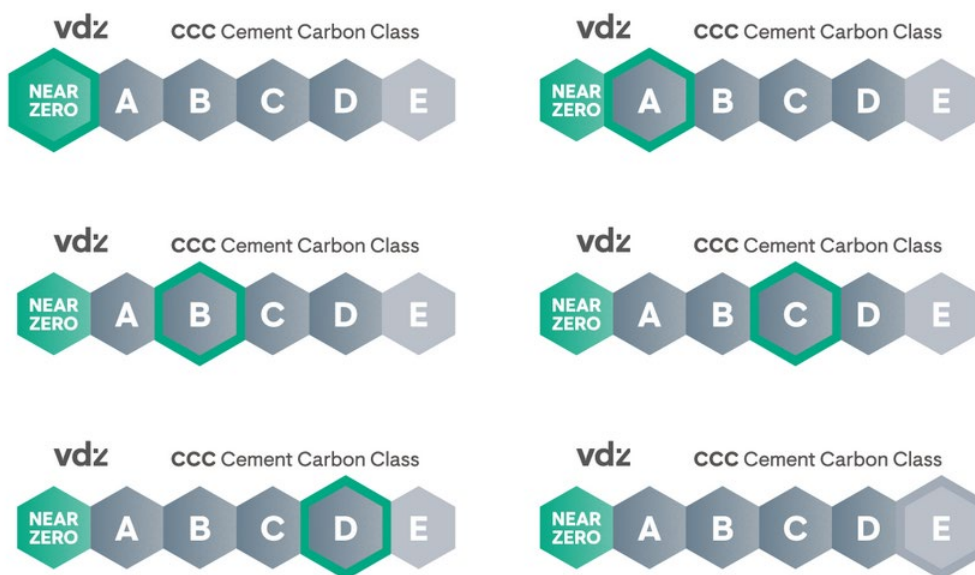
Annex II – VDZ CO₂ label for cement⁶

VDZ's new CO₂ label (Cement Carbon Class, CCC) classifies climate-friendly products as follows: Classes A to D identify low-emission cements with a CO₂ footprint of between 100 kg CO₂/t cement and 500 kg CO₂/t cement in four levels. 'Near zero' cements are those with a CO₂ footprint of less than 100 kg CO₂/t of cement.

Cement classes:

CCC classes for cement		Requirement (GWP) CO ₂ Equ / t cement
Climate-friendly	D	400 ≤ GWP < 500
	C	300 ≤ GWP < 400
	B	200 ≤ GWP < 300
	A	100 ≤ GWP < 200
	Near Zero	< 100

Label:



⁶ <https://www.vdz-online.de/en/news-1/vdz-introduces-co2-label-for-cement>