

Dear Sir/Madam

I have only had a brief chance to review the key findings but the changes to the cement market as envisaged by yourselves are to be welcomed. I would like to comment specifically on GGBS and PFA and their potential role going forward.

I work for [a global engineering, consulting and construction company]. In the UK we are on a construction framework for the Environment Agency (under Defra).

The Environment Agency are likely to introduce a requirement (a 'carbon cap') to reduce the carbon footprint of concrete (in accordance with their climate change goals), which will lead to a change in the composition of cement used. In particular the use of CEM 1 will be reduced and cement including significant proportions of GGBS and PFA will be the norm. [✂].

For a variety of technical reasons GGBS is preferred to PFA, and can certainly be used to replace more CEM 1. This is attractive from a carbon footprint perspective as it is CEM 1 which has by far the highest carbon footprint.

It is conceivable that this proposed reduction in carbon footprint for concrete may become more common across public construction procurement.

Because of fairly conservative construction codes the most likely preferred alternative material to CEM 1 is GGBS (structural concrete codes strictly control what materials can be used in cement). Whilst PFA can be used it can only be used in small proportions for structural use. Therefore an increase in demand for GGBS is perhaps likely beyond the normal pricing signals.

Therefore it may be more vital that a competitive market in GGBS is available, as it may not be easy to find alternatives with the same carbon performance. It is also my view that having key materials under the control of individual companies also serves to stifle both competitors and innovation, as the status quo is probably the most profitable approach for incumbents.

There are a number of technical, organisational and market reasons why innovation in cement composition is limited in the UK (with a few notable exceptions). A more competitive market with more emphasis on innovation would be welcomed.

I should stress these are my personal views and do not represent the views of [the company I work for] or the Environment Agency. Because the UK cement industry seems very insular from international markets it is possible that these emerging changes in public procurement of cement and concrete may be significant in the medium term and influence the market.

Regards

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