

# CCSA UK Low-Carbon Products & CCU Working Group

27/08/2025

9:30 – 11:00 BST / 10:30 – 12:00 CEST



# Housekeeping

- Meeting is being recorded, slides and recording will be circulated with members
- CCSA Competition Law Policy notice is attached to the meeting invite/available on the CCSA website
- If you are not speaking, please mute your microphone
- Please **raise your hand** if you wish to comment, you will be invited to come off of mute, if you can also turn on your camera
- Please also pose any **comments in the chat** and these will be picked up by the secretariat

# Agenda

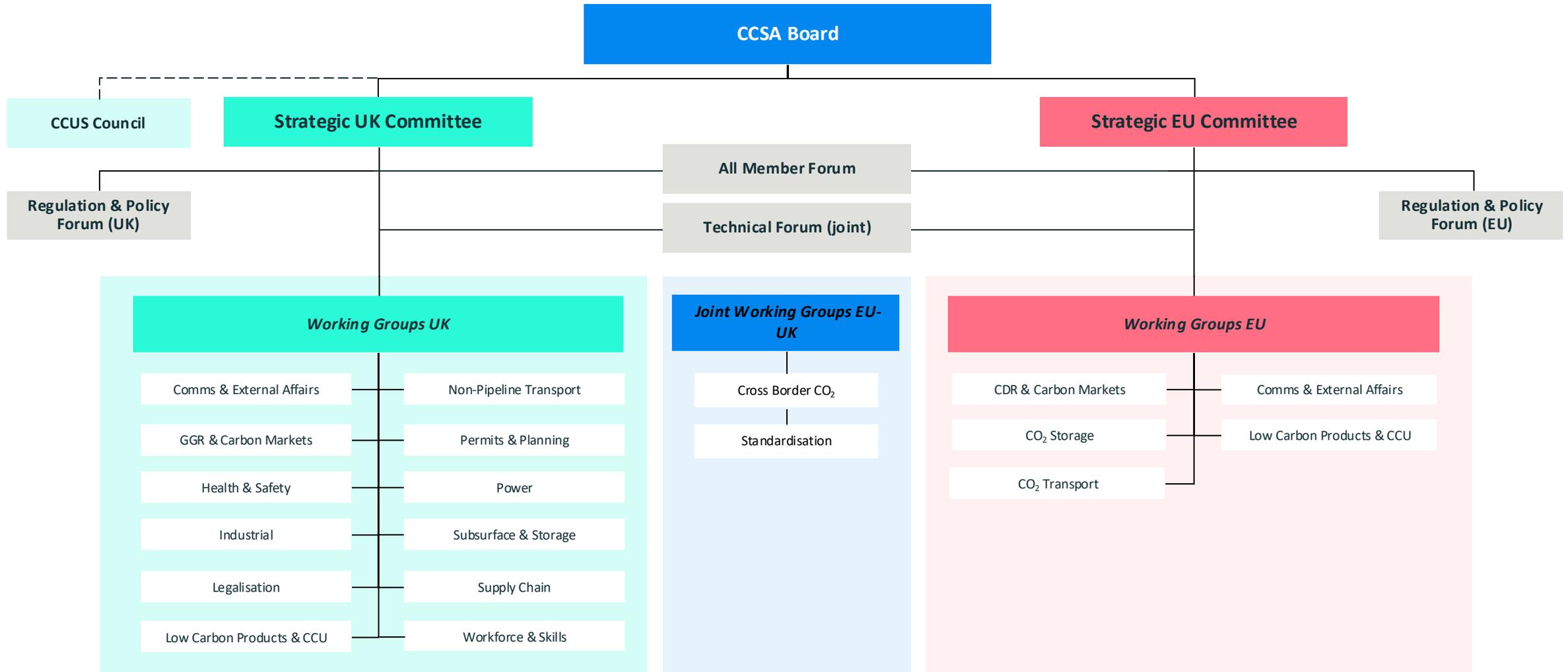
	Time	Topic	Speaker
1.	9:30 BST 10:30 CEST	Introduction	CCSA Secretariat
2.	9:35 BST 10:35 CEST	CCSA Working Group structure updates	CCSA Secretariat
3.	9:45 BST 10:45 CEST	Presentation: Use of CCSA's CCU position paper	DESNZ
4.	9:55 BST 10:55 CEST	Building the evidence base on low-carbon products	CCSA Secretariat
5.	10:10 BST 11:10 CEST	Member positioning call: low-carbon products consultation	All
6.	10:55 BST 11:55 CEST	AOB & conclusion	CCSA Secretariat

# CCSA Working Group structure updates

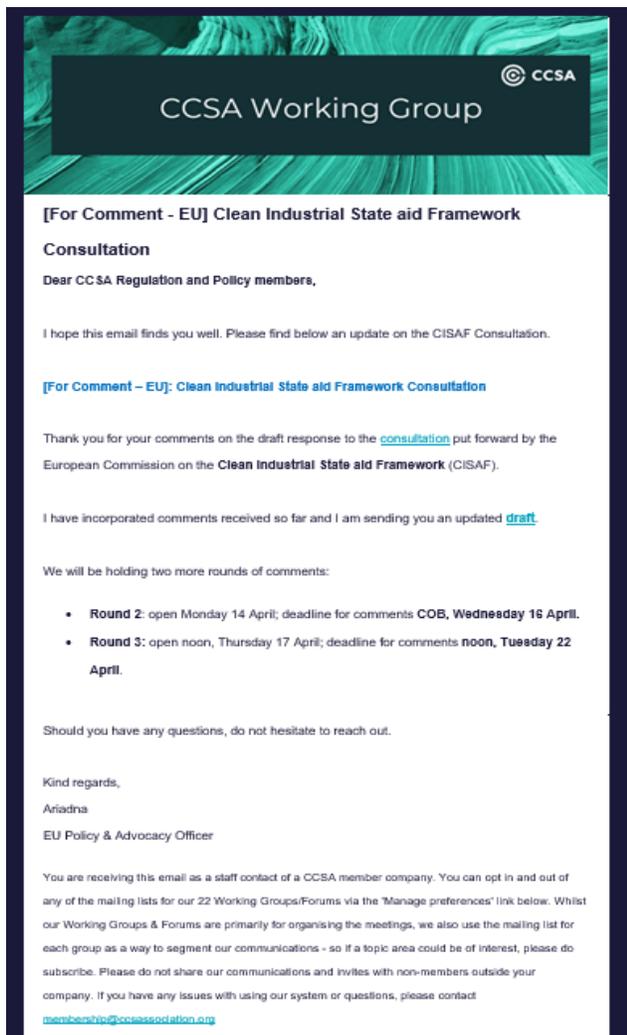
Sophie Deijkers, CCSA



# Committees, Working Groups & Forums Structure



# New email system for member communications



**CCSA Working Group** 

**[For Comment - EU] Clean Industrial State aid Framework Consultation**

Dear CCSA Regulation and Policy members,

I hope this email finds you well. Please find below an update on the CISAF Consultation.

**[For Comment – EU]: Clean Industrial State aid Framework Consultation**

Thank you for your comments on the draft response to the [consultation](#) put forward by the European Commission on the **Clean Industrial State aid Framework** (CISAF).

I have incorporated comments received so far and I am sending you an updated [draft](#).

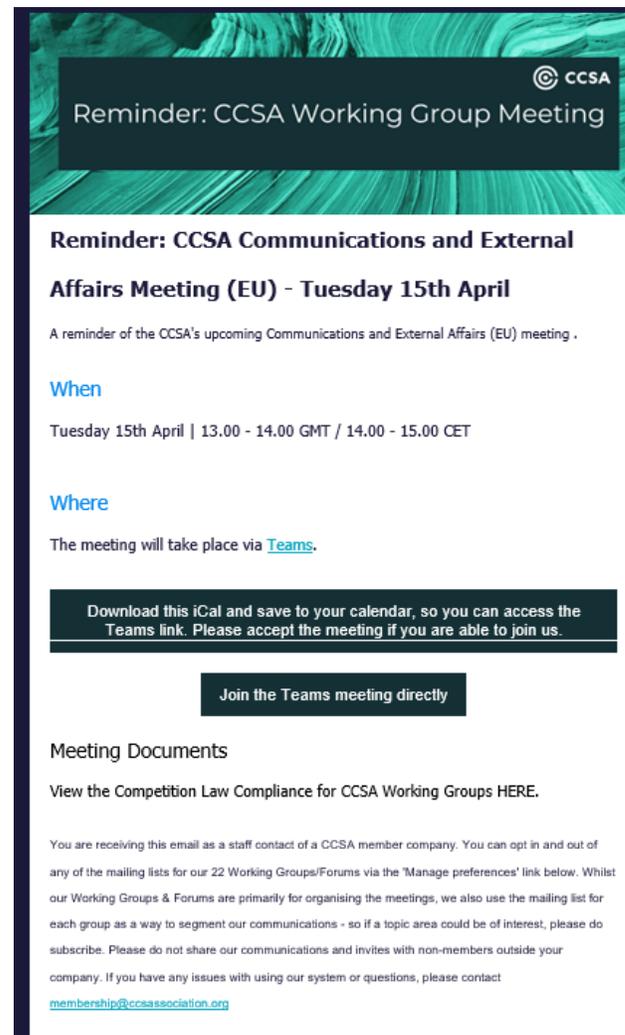
We will be holding two more rounds of comments:

- **Round 2:** open Monday 14 April; deadline for comments **COB, Wednesday 16 April**.
- **Round 3:** open noon, Thursday 17 April; deadline for comments **noon, Tuesday 22 April**.

Should you have any questions, do not hesitate to reach out.

Kind regards,  
Ariadna  
EU Policy & Advocacy Officer

You are receiving this email as a staff contact of a CCSA member company. You can opt in and out of any of the mailing lists for our 22 Working Groups/Forums via the 'Manage preferences' link below. Whilst our Working Groups & Forums are primarily for organising the meetings, we also use the mailing list for each group as a way to segment our communications - so if a topic area could be of interest, please do subscribe. Please do not share our communications and invites with non-members outside your company. If you have any issues with using our system or questions, please contact [membership@ccsasociation.org](mailto:membership@ccsasociation.org)



**Reminder: CCSA Working Group Meeting** 

**Reminder: CCSA Communications and External Affairs Meeting (EU) - Tuesday 15th April**

A reminder of the CCSA's upcoming Communications and External Affairs (EU) meeting .

**When**

Tuesday 15th April | 13.00 - 14.00 GMT / 14.00 - 15.00 CET

**Where**

The meeting will take place via [Teams](#).

**Download this iCal and save to your calendar, so you can access the Teams link. Please accept the meeting if you are able to join us.**

**Join the Teams meeting directly**

**Meeting Documents**

View the Competition Law Compliance for CCSA Working Groups [HERE](#).

You are receiving this email as a staff contact of a CCSA member company. You can opt in and out of any of the mailing lists for our 22 Working Groups/Forums via the 'Manage preferences' link below. Whilst our Working Groups & Forums are primarily for organising the meetings, we also use the mailing list for each group as a way to segment our communications - so if a topic area could be of interest, please do subscribe. Please do not share our communications and invites with non-members outside your company. If you have any issues with using our system or questions, please contact [membership@ccsasociation.org](mailto:membership@ccsasociation.org)



## Practicalities

---

- **WG meetings** to be held as and when required with a minimum of 3 meetings per year and an active workplan. Recordings and notes will be shared via the website. Inactive Working Groups will be disbanded, and new groups – as well as time-limited project-specific groups - can be established to reflect changing work priorities.
- **Terms of Reference:** each WG will agree ToR to set out a workplan/key strategic priorities and deliverables for each group annually, as well as terms of engagement for WG members who will be expected to actively participate in the group.
- **Co-chairs:** each WG will have up to 4 co-chairs.

# Previous WG work streams

---

## Previous CCU WG

- Started in January 2024
- CCSA lead: Despoina Tsimpridikou
- Meetings held: 4
- Reviewed previous CCSA positions on CCU (2022) to form a technical position paper on CCU as part of the UK Govt's CCUS Vision

# Presentation: Use of CCSA's CCU position paper

Carly Leighton, Department for Energy Security and Net Zero



# Building the evidence base on low-carbon products

Rebecca Bell, CCSA



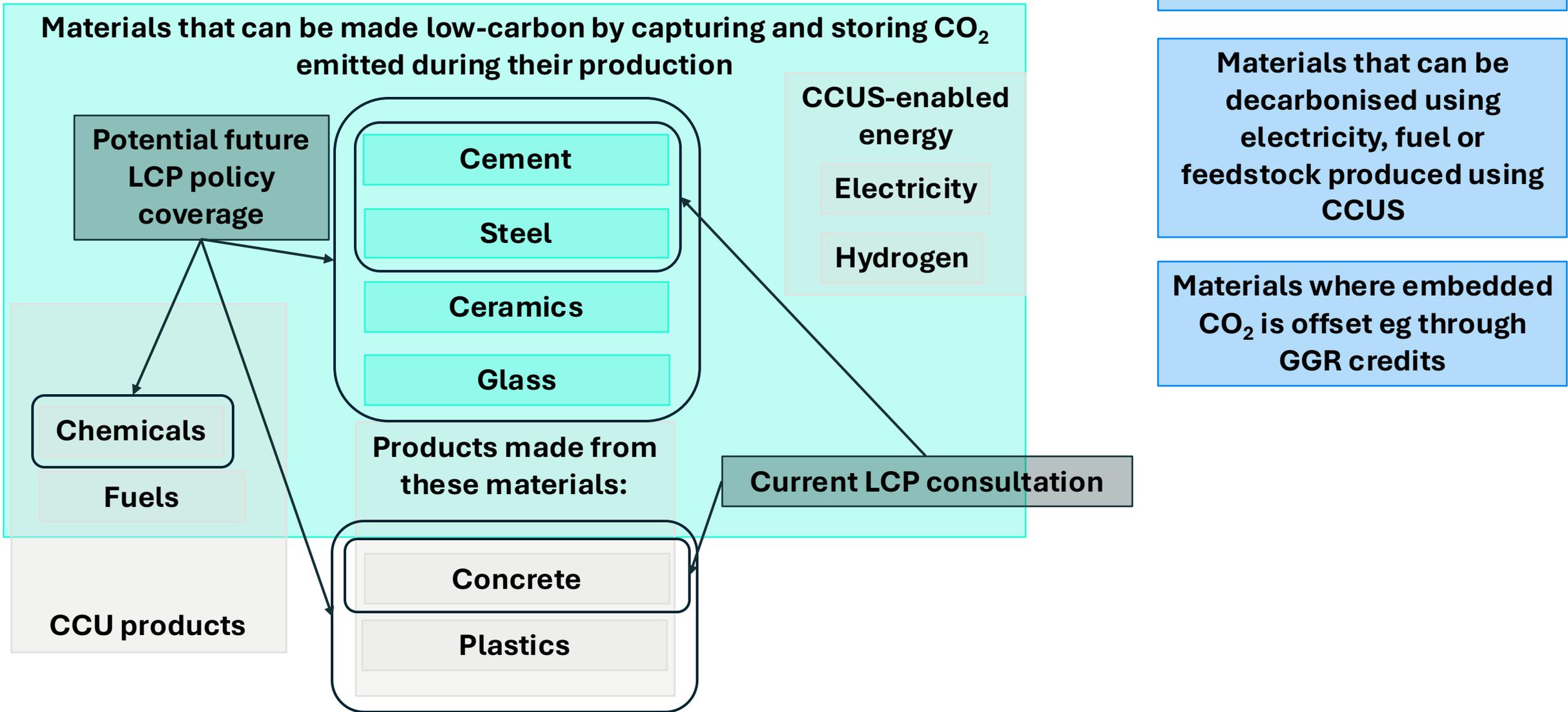
# Purpose

---

- Demonstrate the need for interventions to build a low carbon products market
- Demonstrate the potential for low carbon products – projects in the pipeline
- Demonstrate the size of the prize
- Set out the issues that need to be addressed in policy
- Demonstrate consumers' willingness to pay
- What else?...

**What questions are we trying to answer?**

# Scoping



# Scoping

---

- Geography: UK and EU
- In scope:
  - Current and projected size of the market for construction materials
  - Willingness to pay – housebuilders, mortgage providers?
  - Sectoral decarbonisation plans – timelines, barriers, needs
- Out of scope:
  - Detail on embodied emissions reporting
  - Detailed design of LCP measures
- Partners:
  - Trade associations
  - CCSA members

**What questions are we trying to answer?**

# Member positioning call: low-carbon products consultation

Sophie Deijkers, CCSA



# Context

---

- Follows 2023 carbon leakage consultation where govt committed to establish an **embodied emissions reporting framework (EERF)** and **product classifications** + announcement of CBAM by 2027
- Initial focus = **steel, cement, concrete** used in construction
- Currently no single agreed methodology for measuring embodied carbon of industrial products; multiple definitions = confusing
- Consultation seeks to address:
  - How to measure, report, and verify emissions of a product through EERF (chapter 2-4)
  - How to define a LCP through product classifications (chapter 5)
  - How to encourage use of this info to inform green purchasing decisions (chapter 6)
- **Initially a voluntary approach**, move to mandatory requires more work/consultation

# Chapter 1: Cross-cutting considerations

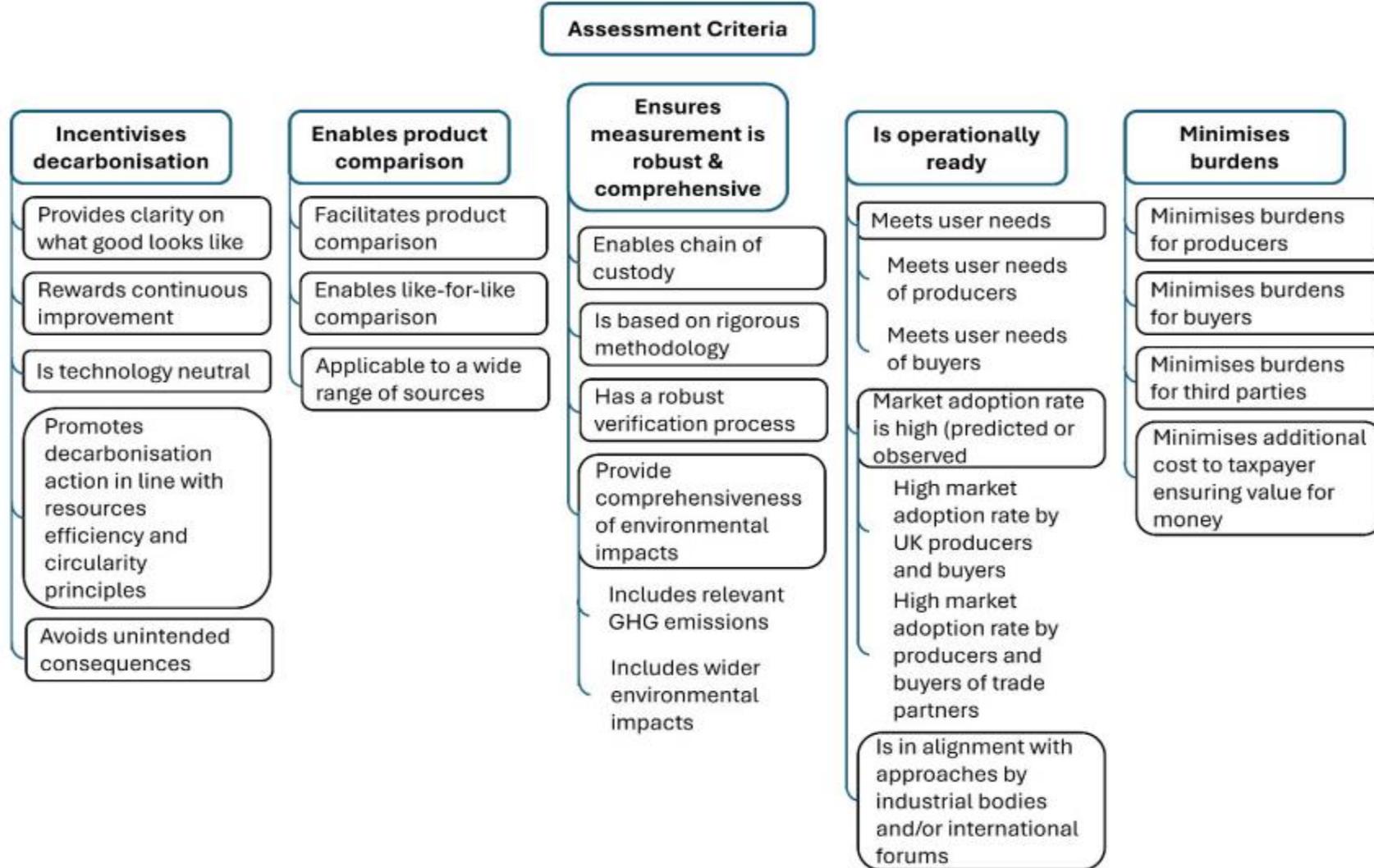


Figure 1: Summary of proposed assessment criteria

# Chapter 1: Cross-cutting considerations

---

## **Proposed response:**

We support the government's primary policy criteria, especially the need to incentivise decarbonisation of heavy industry. For sectors like steel, cement, and concrete CCUS will be essential to meet net zero, so the framework must create strong market signals for its deployment.

Transparent product comparison, robust life-cycle measurement, and cost-effective but ambitious implementation will be key. While global warming potential remains the core metric, the framework should also recognise broader environmental impacts. The policy should boost UK competitiveness in international trade by aligning with digital product passports and other global systems.

## Chapter 2: The EERF: overview and crosscutting considerations

---

- Key principles for the EERF
  - Maximise the use of existing data
  - Ensure sufficient accuracy to inform policy
  - Minimise administrative burdens
  - Align with global standards, where possible
- **Intended users:** producers of in scope products sold on the UK market and buyers of in scope products including public and private sector procurers
- Chapter seeks views on the **purpose** of the EERF:
  - Which features would most benefit the producers and buyers of steel, cement, and concrete
  - Carbon accounting guidance, a database, MRV tools, access to secondary data
  - Weighs voluntary vs. mandatory approaches (initial recommendation: voluntary, possible later transition to mandatory)
  - Discusses guidance styles (prescriptive vs. permissive)
  - Recommends life cycle assessment (LCA)-based reporting as the initial focus

## Chapter 2: The EERF: overview and crosscutting considerations

---

### Proposed response:

We support the EERF as a foundation for transparent markets and informed procurement. Producers and buyers are the primary users, but public authorities, investors, and verifiers must also be integrated. Benefits include enabling product comparison, driving supply-chain decarbonisation, and building investor confidence.

Barriers remain, including inconsistent methodologies, high costs, and data availability, but these can be overcome with harmonised standards, sector-specific guidance, and digital tools. We support an initial voluntary phase **with a clear roadmap to mandatory reporting**. Alignment with best-practice LCA methodologies, existing databases, and international systems is essential, as is explicit recognition of CCUS in emissions accounting.

## Chapter 3: Guidance in the EERF

---

Chapter 3 outlines the rationale for utilising existing internationally recognised standards instead of developing new ones. It seeks views on:

- Which Product Carbon Footprint or Environmental Product Declaration standard(s) the government could endorse
- Recommendations for verifying embodied emissions
- Defining the EERF reporting metric(s)
- Identifying relevant life cycle stages
- Recommended standards for measuring embodied emissions
- Verification of embodied emissions data

To enable methodological consistency four additional technical considerations are consulted on in this chapter:

- Secondary data, emissions factors, and default values
- Emissions allocation of co-products
- Accounting for alternative fuels
- Ensuring data quality

## Chapter 3: Guidance in the EERF

### **Proposed response:**

We agree that consistency and clarity are essential to support a credible market for low-carbon industrial products. We support the use of LCA approaches as the foundation for reporting, provided that guidance sets clear boundaries, ensures comparability, and aligns with international initiatives such as the IDDI and IEA. At the same time, flexibility will be required to accommodate sector-specific circumstances and to avoid disproportionate burdens, particularly for smaller producers.

High-quality data and verification are fundamental to building confidence in the framework. We encourage a strong emphasis on primary data collection, with transparent and consistent use of default factors where this is not possible, and robust third-party verification to ensure trust. The guidance should also build on existing systems such as the ETS, CBAM, and EPDs to avoid duplication and streamline reporting. Critically, the framework must account fully for the role of CCUS, ensuring that captured and stored emissions are recognised transparently and consistently within embodied emissions reporting.

Looking ahead, proportionality will be key to securing widespread uptake, with simplified pathways for SMEs and digital tools to minimise administrative burden. While a voluntary approach is appropriate in the short term, guidance should be designed with a view to supporting a transition to mandatory reporting once international alignment and industry readiness allow. By balancing comparability with flexibility, embedding robust verification, and recognising CCUS, the EERF guidance can provide the foundation for a trusted and effective low-carbon product market in the UK.

# Chapter 5: Product classifications for embodied emissions

Formerly "voluntary product standards" ==> classifications remain voluntary, meaning manufacturers are not required to meet any specific classification

## **Steel product classifications**

1. ResponsibleSteel Decarbonisation Progress Levels (DPLs)
2. Low Emission Steel Standard (LESS)
3. Global Steel Climate Council's (GSCC) product standard
4. Green steel scale in the Construction Leadership Council's (CLC) Five Client Carbon Commitments (5CCCs)
5. U.S. Environmental Protection Agency's (EPA) approach to setting limits for low embodied carbon steel

## **Concrete product classifications**

1. The Lower Carbon Concrete Group's (LCCG) Market Benchmark
2. Arup-Innovate UK's (UKRI) Universal Classification for embodied carbon of concrete
3. The Global Cement and Concrete Association's (GCCA) Global Ratings adapted for the UK by the Mineral Products Association (MPA)

## **Cement product classifications** (none specific to UK, need to be adapted)

1. The International Energy Agency (IEA)
2. The Industrial Deep Decarbonisation Initiative (IDDI)
3. The German Cement Producers' Association (Verein Deutscher Zementwerke, VDZ)
4. The U.S. Environmental Protection Agency (EPA)

# Chapter 5: Product classifications for embodied emissions

## **Proposed response:**

We support the development of product classification frameworks that are internationally aligned, robust, and flexible enough to reflect domestic industry needs. Drawing on established benchmarks will ensure credibility, comparability, and avoid market fragmentation in global trade. At the same time, a UK-specific adaptation can recognise national decarbonisation priorities, including the particular role of CCUS in cement, concrete, and steel production, ensuring classifications remain relevant to domestic stakeholders.

A core principle of any framework must be the explicit recognition of CCUS. Cement, concrete, and steel have limited pathways to deep decarbonisation beyond carbon capture, and clear accounting for captured and permanently stored CO<sub>2</sub> is essential to incentivise investment and create a functioning market for low-carbon industrial products. Technical robustness should be complemented by practical, buyer-facing tools to support procurement and accelerate adoption within the construction sector, while still maintaining integrity against international benchmarks.

We recommend a hybrid, phased approach: anchor UK classifications in internationally recognised frameworks to ensure global comparability, integrate methodological detail from leading approaches to fully credit CCUS and other decarbonisation measures, and develop simplified tools for immediate market use. This approach balances credibility, transparency, and usability, enabling UK industries to mobilise investment in CCUS, meet domestic decarbonisation goals, and position low-carbon cement and steel competitively in international markets.

# Chapter 6: Green procurement for low carbon products

## Gaps & limitations:

- No central government guidance
- Inconsistent definitions of 'low carbon'
- Inconsistent frameworks for setting commitments
- Misunderstanding around market availability and cost implications

Proposal to develop product level green procurement guidance:

- **Stage 1 core guidance**
  - Policies and processes (e.g. organisation-wide commitments or standards for purchasing low-carbon products)
  - Practical resources (e.g. templates and case studies to support implementation)
  - Good practice advice
- **Stage 2 expanded guidance** moves from awareness-raising toward greater consistency and comparability
- **Stage 3 high ambition guidance**
  - Low carbon products (buy in the highest proportions possible)
  - Medium carbon products (buy as a minimum)
  - High carbon products (do not buy)

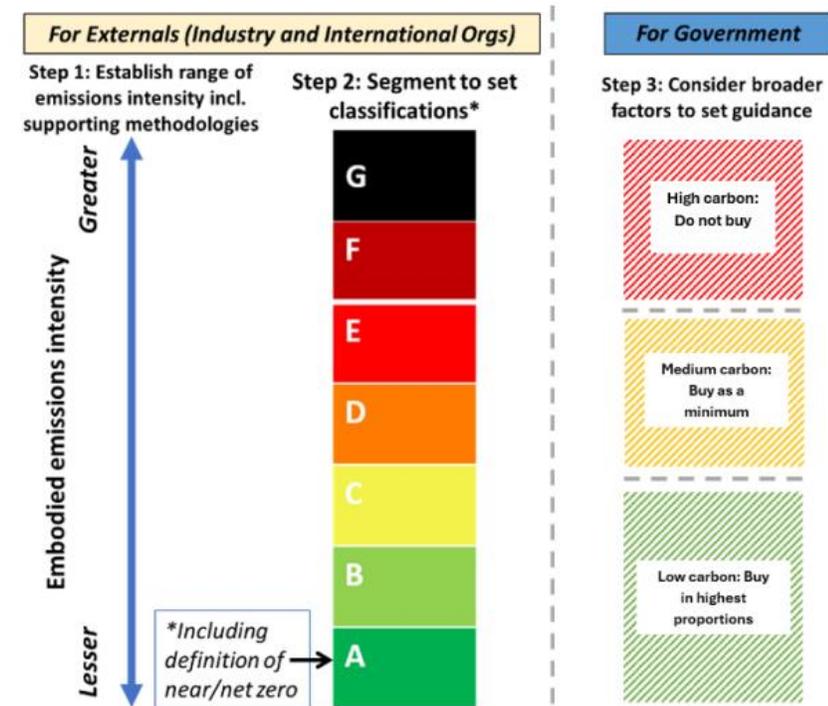


Figure 12: Diagram illustrating the relationship between embodied emissions data, product classifications and proposed buying categories.

# Chapter 6: Green procurement for low carbon products

## Proposed response:

We strongly support the use of public procurement as a market-making tool to stimulate demand for low-carbon industrial products. With public procurement accounting for a significant share of UK GDP, embedding embodied carbon considerations into purchasing decisions can play a decisive role in creating early demand signals, de-risking investment, and scaling up the deployment of decarbonisation technologies.

We welcome the proposed staged approach to guidance. Stage 1 can raise awareness and build capability, while Stage 2 can standardise methodologies and promote consistent use of product classifications and EPDs. Stage 3 should set clear preferences, discouraging the use of high-carbon products and maximising uptake of genuinely low-carbon materials. Across all stages, it is essential that procurement guidance is internationally aligned, practical for buyers, and flexible enough to reflect UK priorities.

CCUS is a primary decarbonisation route, therefore procurement policies must be technology neutral, crediting captured and permanently stored CO<sub>2</sub> on an equal footing with other low-carbon pathways. Alongside this, a balance should be struck between robustness and usability: a technically credible system should be complemented by simplified buyer-facing tools that make procurement practical for contracting authorities. In doing so, the UK can ensure procurement delivers credibility, transparency, and accessibility while driving early demand for low-carbon industrial products and positioning UK industry competitively in global markets.

# Chapter 7: Longer term policy options

## Longer term options:

- **Ecolabelling**
  - **Approach A:** utilise existing ecolabels
  - **Approach B:** develop new forms of ecolabels
  - Govt will need to consider EU plans to implement **Digital Product Passports (DPP)** by 2027
- **Mandatory product standards (MPS)**
  - Sets upper limits on the embodied emissions of certain industrial products produced in or imported into the UK

## Future exploration of sector scope expansion:

- **Approach 1:** Other construction related sectors and products (i.e. asphalt, ceramics, glass, plastics)
- **Approach 2:** The next largest emitting industrial sectors (i.e. chemicals)
- **Approach 3:** Sectors that would enable expansion to downstream products (i.e. aluminium, plastics)

# Chapter 7: Longer term policy options

## **Proposed response:**

The CCSA welcomes the government's consideration of longer-term policy levers such as ecolabelling, Digital Product Passports (DPPs), Mandatory Product Standards (MPS), and potential sector scope expansion. These measures can play an important role in shaping demand, strengthening comparability, and sending clear market signals as supply chains for low-carbon industrial products mature.

On ecolabelling, we support a pragmatic approach that prioritises international alignment and avoids unnecessary proliferation of labels. Building on existing schemes will ensure credibility and comparability, while the use of DPPs can improve traceability and interoperability across borders. Any UK system must recognise captured and permanently stored CO<sub>2</sub>, ensuring that CCUS is properly credited in ecolabelling and DPP frameworks.

Before introducing binding emissions limits, robust reporting systems and product classifications must be in place, alongside safeguards to prevent unintended consequences such as leakage or supply chain distortions. In terms of scope expansion, a phased approach is sensible. Construction-related materials, high-emitting sectors such as chemicals, and eventually downstream products should all be considered, but expansion must build on robust methodologies and ensure consistency with international standards.

By sequencing these policies carefully, the UK can provide clear long-term direction while avoiding duplication, maintaining competitiveness, and ensuring investment in CCUS and other deep decarbonisation technologies is fully recognised.

# Chapter 4: An EERF IT System

---

Aim = centralise data collection, improve transparency, and enable comparability across products and sectors

## **Chapter 4 explores:**

Functionality 1: Publishing and displaying product level data

Functionality 2: Data comparison tools

Functionality 3: A database for life cycle emissions

Functionality 4: Product benchmarking tools

Functionality 5: Reducing administrative burden

# Chapter 4: An EERF IT System

---

## **Proposed response:**

We support the development of an IT system for embodied emissions reporting as a critical enabler of transparency, comparability, and effective market creation for low-carbon industrial products. A well-designed system would provide the data backbone to underpin procurement policies, product classifications, ecolabels, and any future mandatory product standards.

We recommend that the system be aligned with international approaches, particularly EU initiatives such as the Digital Product Passport, to minimise duplication and ensure UK producers remain competitive in export markets. It should also integrate with existing reporting structures, such as EPDs, rather than impose new bespoke requirements. This will reduce administrative burden and build on existing industry practice.

Ensuring robust verification processes while maintaining usability will be essential. If designed effectively, this IT system can provide the foundation for credible, internationally aligned markets that incentivise investment in CCUS and other low-carbon technologies.

# AOB & Conclusions

- Draft LCP response to be shared with members  
1 – 5 Sept (submit 15 Sept)
- Next meeting tbc
- Co-chairs: email Sophie

[Sophie.deijkers@ccsassociation.org](mailto:Sophie.deijkers@ccsassociation.org)

