PARTANNA™

Building a World That Breathes

Sep 8, 2023

Climate Action Reserve
600 Wilshire Blvd. Ste 202
Los Angeles, CA 90017

Re: U.S. Low-Carbon Cement Protocol Development, Public Comment Period

To Whom It May Concern:,

Thank you for the opportunity to submit our comments on the U.S. Low-Carbon Cement Protocol Development. Our company offers a carbon negative cement alternative to Portland cement that both avoids CO2 emissions and offers a net removal of carbon dioxide from the atmosphere.

Currently, the proposed CAR methodology only applies to the displacement of OPC, but we would encourage CAR to consider allowing CO2 capture and utilization to be another means of generating credits. In certain cases, these credits can generate much higher value in the market.

On the theme of higher value, CO2 capture and utilization has drawn the attention of big market movers like Microsoft, Stripe, Shopify, etc. Many of these large companies are looking to ensure credits in this space can eventually be put on established registries, but the methodology options are limited (eg: VM0043).

A significant new ecosystem of companies is emerging that is focusing on CO2 capture and utilization, and the mineralization into cement and concrete is – by all accounts – a permanent removal. But these companies' technologies are emerging and expensive – and the carbon market is perfectly suited to help these companies scale. In fact, catalyzing new, scalable technology is one of the key reasons why the Voluntary Carbon Market exists.

We believe NOT including CO2 capture and utilization in this protocol would be a missed opportunity to help these companies and catalyze this new industry. Also, the methodology options are currently very limited. For example, VM0043 only

covers ready-mix concrete so it would be great to have additional options. In addition, companies involved in the broader CDR (carbon dioxide removal) space are looking to establish alternative (and potentially competitive registries), in part because of the lack of options. CAR can help solve this issue.

It would also appear that the changes required would not be extensive. There would need to be some changes to a couple of equations, but if we think of CO2 as another SCM, the project emissions associated with making that SCM are essentially already there. There would need to be some guidance on how to measure the level of CO2 mineralization, but there are other established precedents we can draw from, including VM0043.

Sincerely yours,

Rebekkah Swisher

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