

McKenzie Smith

From: Ingy El Kafrawy <ielkafrawy@carboncure.com>
Sent: Friday, September 8, 2023 11:02 AM
To: McKenzie Smith
Subject: RE: U.S. Low-Carbon Cement Protocol Development

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Hello,

I hope you're doing well.

As part of the public commentary period for the U.S. Low-Carbon Cement Protocol Development, CarbonCure had the below questions and comments.

- Equivalence between baseline and project scenarios: how this is determined is not clear in the protocol. Without clear guidelines around the strength/performance of the concrete there is a risk that project proponents can over design mixes by reducing total cement content. To keep the integrity of credits issued via this methodology we wanted to ensure that this was accordingly addressed.
- Additionality via the performance standard test nestling project proponents into a 10-year credit period where applicable SCMs are measured against is viewed as fairly lax given the constant changes that occur in the concrete space. A more conservative time-frame to reassess prevalence of SCMs would be better suited, perhaps every 5-years.
- Project Stacking needs to be considered in the wider spectrum of other GHG programs that generally do not allow for multiple projects and project activities to occur in the same location and facilities.

I'm curious how CAR typically circulates all comments and when we can expect the above to be addressed.

Thanks so much,
Ingy

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