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September 8, 2023

McKenzie Smith  
Associate Director  
Climate Action Reserve  
818 W. 7<sup>th</sup> Street, Suite 710  
Los Angeles, CA 90017

**RE: ClimeCo Comment on US Low-Carbon Cement Protocol Public Comment Draft**

Dear McKenzie:

Thank you for the opportunity to participate and comment on the development of the Reserve's Low-Carbon Cement Protocol. ClimeCo is a global sustainability firm and we are pleased that the Reserve is designing a protocol to help decarbonize the cement industry and bring high-quality emission avoidance credits to market. As a leading project developer, we are especially grateful for the Climate Action Reserve's commitment to managing a public and transparent process and prioritizing a high-quality program. ClimeCo has developed these comments in response to the Public Comment Webinar hosted by the Reserve on August 25, 2023 along with the US Low-Carbon Cement Protocol Public Comment Draft.

- I. **We support the Reserve's commitment to developing regional baseline emissions with the Portland Cement Association, however we request clarification on how the baseline inputs are developed.**
  - a. Section 5.1.1.2 states, "Regions for the purposes of the baseline calculations are based on SCM/ACM sales." We request clarification on whether project developers would be required to create a unique baseline for each sale of SCM or if that baseline could also be based on where the SCM is produced. If baseline inputs are set by the sale of SCM, we recommend clarifying that the input region would be established by the bill of lading (BOL) for first point of sale which is already required under the protocol.
  
- II. **We believe that there is sufficient interest and potential applicability to generate Climate Reserve Tonnes from carbon removal through mineralization. We recommend that the Reserve explore this activity, however we suggest pursuing a protocol revision or new protocol if the inclusion of this activity would delay adoption of the Low-Carbon Cement Protocol.**

**III. We support the Reserve's commitment to avoiding double-claiming. However, to reflect the legal and actual limitations of the Project Developer's (i.e., the SCM/ACM manufacturer) influence on supply chain reduction claims, we recommend that the Reserve revise paragraph five of the Attestation of SCM/ACM Use.**

- a. The SCM/ACM manufacturer must attain the legal title and ownership of the emission reductions; however, any emission reduction claims made by end-users of the product are outside of the SCM/ACM manufacturer's knowledge and control. We suggest that the Reserve remove the following statement from paragraph five of the Attestation: "and the end-user shall not claim any rights to the Project Reductions or make any quantifiable claims towards their own greenhouse gas emissions reductions targets or inventory."

**IV. We suggest that the Reserve clarify ownership and project management requirements.**

- a. Section 2.3 (Ownership) includes some conflicting language around ownership. We recommend clarifying that the SCM manufacturer is the default owner to avoid any risk of double counting. For clarity, we suggest removing the second sentence which states, "Project developers may be SCM/ACM suppliers and manufacturers, low-carbon cement technology suppliers, and/or entities that specialize in project development."
  - i. As previously discussed, we recommend that the entity processing and marketing the SCMs or alternative cement be the default credit owner to address the widespread supply gap and direct much-needed financing to one of the most burdened points in the supply chain.
- b. Additionally, it is currently unclear whether project diagrams will be required for registry submission. As previously discussed, these project types contain proprietary design thus we recommend excluding project diagrams from the protocol requirements. Additionally, we recommend ensuring that the protocol contains consistent language around joint verification.