



DATE:
August 29, 2023

Dear McKenzie,

Thank you for the opportunity to provide comments on CAR's latest draft of the Low-Carbon Cement Protocol! We have a few suggestions, the addition of which would enable CarbonBuilt to add upcoming projects and available credits to CAR

1. The proposed protocol currently applies only to the displacement of Portland Cement and does not consider CO₂ capture and storage a creditable activity. This is a missed opportunity. Emerging concrete decarbonization suppliers such as CarbonBuilt, CarbonCure, Solidia, CarbiCrete, etc., use mineralization techniques to permanently sequester CO₂ in concrete -- a critical vehicle for gigatonne-scale carbon dioxide removal (CDR) and CO₂ utilization.

There's enormous demand for permanent CDR and utilization credits and a shortage in supply. Major buyers like Microsoft, Stripe, Shopify, Alphabet, and Meta have shown support for CO₂ utilization-based cement and concrete by pre-purchasing carbon removal.

2. Emissions reductions from concrete production (i.e. steam curing reduction) and new energy use from new equipment should be included.
3. Finally, it would be helpful to include onsite renewables or vPPA to reduce incremental energy emissions from new equipment.

The changes required for the protocol would not be extensive. Suggestions for the additional equations and monitoring guidance have been provided to the working group. Other established precedents, like VM00043, can also be used.

Thank you for your consideration and please do not hesitate to contact me if you have any questions or concerns regarding this commentary.

Best,

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Head of Product

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