



To:

Kadri Simson, EU Commissioner for Energy  
Wopke Hoekstra, EU Commissioner for Climate Action  
Thierry Breton, EU Commissioner for the Internal Market  
Ditte Juul Jørgensen, Director-General DG ENER  
Kurt Vandenberghe, Director-General DG CLIMA  
Kerstin Jorna, Director-General DG GROW

Brussels, 1 February 2024

**Subject: Call for concrete demand and supply side initiatives to promote a market for low-carbon products in the Industrial Carbon Management Strategy (ICMS)**

Dear Commissioner Simson, Commissioner Hoekstra, Commissioner Breton, Director-General Juul Jørgensen, Director-General Vandenberghe, Director-General Jorna,

In the context of the upcoming Industrial Carbon Management Strategy (ICMS), the signatories of this letter are calling on the European Commission to ensure that the ICMS reflects the urgent need to foster a market for low-carbon products, with the inclusion of concrete demand and supply side policy initiatives. Such initiatives targeting the demand and supply for low-carbon products will be crucial to advance industrial decarbonisation, including through the scale-up of European green lead markets.

A strong ICMS is crucial to support a European market for low-carbon products. As enshrined in the European Green Deal, it will be crucial to capture, transport and store emissions from harder-to-abate sectors to reduce emissions by 55% by 2030 and ultimately reach climate neutrality by 2050. Concretely, the signatories to this letter are asking the European Commission to promote an EU market for low-carbon products in the ICMS, through an assessment of different needs and establishment and announcement of different initiatives, including but not limited to:

- Announce and publish a low-carbon products strategy.
- Announce and establish science-based methodologies for low-carbon products to accurately account for their embodied carbon based on their whole life-cycle.
- Revise the EU procurement rules to include mandatory sustainability criteria.
- Support the establishment of private buyers' alliances of European companies to quickly scale demand for green basic materials.
- Assess and establish incentives for upstream producers of low-carbon products and downstream users of low-carbon end-products.

Such initiatives, aimed at advancing lead markets for low-carbon products, would fit well into the aims of the ICMS, and ensure a holistic approach to industrial decarbonisation.

As signatories, we welcome Commissioner Simson's statement during the third CCUS forum in Aalborg that "we will have to scale up CCS under all scenarios". We have noted a recent statement by Commissioner Kadri Simson that the upcoming Strategy will consider the entire value chain of CCS projects, including investment strategies, management processes and access to CO<sub>2</sub> infrastructures. We therefore strongly urge that the above initiatives are included in the ICMS or that a low-carbon products strategy is announced in the ICMS, to ensure this crucial piece of the puzzle is not left unaddressed.

Together, we wish for a successful Green Deal implementation and consider the creation of a market for low-carbon products key to enable Europe to deliver on the green transition.

Yours sincerely,

**Bellona Europa**

**CATF**

**CEMBUREAU**

**CCS Europe**

**EuLA**

**Fertilizers Europe**

**Hafslund Oslo Celsio**

**Heidelberg Materials**

**Horisont Energi**

**Hydro**

**Ocean GeoLoop**

**Yara**

**ZEP**