

September 10, 2021

Shareen Han
Client Services and Permissions Branch
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RE: ERO Posting 019-3544, Amendments to O. Reg. 79/15 to Further Streamline the Use of Alternative Low-Carbon Fuels

I am writing in my capacity as Director of Public Affairs, Sustainability and Stakeholder Engagement for the Cement Association and my over six years working in the cement and concrete industry. I would like to express my support for the proposed amendments to streamline the use of alternative low-carbon fuels (ALCFs).

The use of ALCFs has been a priority for our industry throughout my tenure at the Cement Association of Canada. I believe these changes will have a significant impact, ensuring increased use of low-carbon fuels at our cement plants and having a positive effect in the fight against climate change and reducing GHGs.

Canada's cement and concrete manufacturers have committed to leadership in the global effort to mitigate and adapt to climate change and specifically to the ambition of achieving carbon neutral concrete by 2050. In the last twenty years the cement industry has reduced the energy required to make a tonne of cement by approximately 20%. There are few levers available for us to achieve further reductions but the primary one is to replace fossil fuels to heat our kilns with lower carbon alternatives. This regulation will allow us to do that and bring Ontario's regulatory environment more in line with both British Columbia and Alberta. Alternative low-carbon fuels have been used extensively in Europe and the U.S. for many years.

We will continue to pursue other opportunities to achieve our goals include innovating with lower carbon cements, such as Portland-limestone cement and blended cements and accelerating investments in transformative technologies, including carbon capture utilization and sequestration. These promise to reduce carbon in the manufacturing of cement, but also to sequester that carbon in concrete.

The Ontario government has established emission reduction targets of GHGs of 30% by 2030. We are committed to doing our part and estimate that these proposed regulation changes could facilitate a reduction of up to 400,000 tonnes of GHGs per year or up to 2M tonnes by 2030.

This proposal will benefit the government, industry, and most importantly, the environment. We thank the Ministry of the Environment, Conservation Parks for working with the cement and concrete industry and recognizing the potential of ALCFs for reducing GHGs.

Sincerely,

Martha Murray

Martha Murray
Director, Public Affairs, Sustainability & Stakeholder Engagement