



Civil Society Response to the launch of the Concrete Sustainability Council Scheme

Gland, IUCN HQ, 26 April 2017

Background

In early 2016, the Concrete Sustainability Council invited IUCN, International Union for Conservation of Nature, to convene representatives from civil society covering different technical areas (see list in Appendix A) and facilitate their input and recommendations to the Concrete Sustainability Council (CSC), and in particular the Technical Manual, Governance and Certification Systems of the CSC Scheme.

Between June and December 2016, IUCN organized two rounds of feedback on the Scheme: a face-to-face consultation meeting that brought together 10 representatives of civil society and generated a detailed report with recommendations for improvements to the Scheme. The second round of consultation focused on the revised version of the technical manual in November 2016, prior to the publication of Version 1 of the manual. For more information, please go to: <https://www.iucn.org/theme/business-and-biodiversity/our-work/business-platforms/concrete-sustainability-council>.

The CSC then published Version 1 of the CSC Technical Manual on 17 February 2017.

We welcome the changes made to the Scheme as a result of Civil Society and Expert inputs throughout 2016, especially linked to clarifying the certification levels and the reduction of management-focused criteria for an increase in outcome-based ones.

Nevertheless, IUCN and the civil society organization (CSO) representatives agree that the Scheme continues to have shortcomings which need to be addressed if the Scheme is to demonstrate best practice and aims to contribute to continuous improvement in the cement and aggregates sector.

This document provides the civil society organization (CSO) representatives feedback on the published Version 1 of the CSC Technical Manual (dated 17 February 2017). The comments are organized by topic:

Scope

While the inclusion of cement and aggregates production into the scheme is very welcome, the scheme still assigns the majority of points (60%) to the production of concrete, which has significantly lower social and environmental impacts.

CSOs stress that the relevance of the Scheme in the long-term is contingent on its scientific robustness and on being able to adequately address the sustainability impacts across the entire supply chain.

Transparency

Transparency is not appropriately addressed in the Scheme despite this being an important recommendation of the CSOs during the consultation. Disclosure and availability of data, reports, studies, plans, strategies and assessments relevant to the public is still limited and explicit in only a few Criteria.

Governance

The explicit role for CSOs in the governance of the Scheme is encouraging. However, this role is still limited and the details of how CSOs will be selected and encouraged to engage have not been made available. It is important to strengthen the commitment to increase the balance between CSO and industry representatives in the medium-term and provide a process and timeline for achieving this.

The CSOs have strongly recommended that the CSC establishes a Stakeholder Group that would be convened on a regular basis (e.g. twice a year) to monitor progress of implementation of the scheme, to aid in continuous improvement of the certification scheme, and to represent the views of indigenous and other non-industry groups/interests.

Pre-requisites for certification

The added pre-requisites for certification on Environmental and Social Impact Assessments (ESIAs) and Indigenous rights are a major concern. The wording of these pre-requisites has deteriorated in the course of the consultation with the two pre-requisites now applying only to quarries opened from 2020 onward. Given that the Scheme has been launched in 2017, clear justification should be provided for such a long transition period. ESIAs are also a legal requirement in most jurisdictions and it would be unacceptable for companies entering the Scheme to have infringed on Indigenous People's Rights. Furthermore, with regards to ESIAs, it is not sufficient to have an ESIA; it should focus on assessing the extent to which the ESIA has been done according to good practice. The section would benefit from making reference to guidelines or good practice on ESIA implementation that exists elsewhere, such as the WBCSD ESIA Guidelines:

<http://www.wbcscement.org/pdf/Guidelines%20for%20Environmental%20&%20Social%20Impact%20Assessment.pdf>.

Multiple levels of certification

CSOs welcome the increased clarity achieved through changing of the entry level certificate from "certified" to "bronze". We are also encouraged that the minimal percentage for receiving a bronze certificate has increased from 20 percent to 30 percent. It is important, however, for the Scheme to strive for continuous improvement and raise difficulty in achieving the different levels on a regular basis. Furthermore, it is recommended that a mechanism for withdrawing certificates from companies that do not make specified improvements within agreed timelines be developed.

Biodiversity

While improvements have been made to the biodiversity credit, there are several outstanding and inconsistent issues. Most importantly:

- Points are currently provided to sites that overlap with areas of high biodiversity value regardless of whether appropriate actions are being taken to avoid and minimize impacts on biodiversity. This could have the perverse incentive of encouraging extraction in areas of high biodiversity value.
- Recognition is provided by the Scheme for the use of Net Positive Impact (NPI) methods rather than the outcomes produced. Furthermore, best practice around NPI states that this should be in perpetuity, not just over the lifecycle of an operation.

Species Extinction

The need for companies engaged in the Scheme to assess extinction risk and avoid species extinction is not addressed in the Scheme despite CSO concerns raised throughout the consultation. It is essential for the Scheme to:

- Explicitly refer to the need for assessing extinction risk of operations through the ESIA.

- Require biodiversity baseline assessments in areas of high biodiversity value to consider the surrounding area to the site.

Water

The CSOs welcome CSC's availability and openness for future alignment and advice on incorporating hydrological risks, specifically on how to best manage and mitigate them.

Energy and Climate

While the majority of Green House Gas (GHG) emissions from this sector come from the chemical process of cement production, the climate section still focuses almost exclusively on reducing GHG from energy use and does not mention altering the chemical process at all. Without altering the chemical process of cement production, it will be simply impossible for the industry to reduce GHG emissions in line with international targets.

Air Quality

Public reporting of all emissions and emission breaches in real time should be included in future versions of the Scheme.

Secondary fuels

Besides referring to waste hierarchy, which is welcomed, CSOs are still concerned that the Scheme could create incentives for burning waste when there are better waste management alternatives. Moreover the criteria do not reflect best available techniques (BAT) at all. The scheme needs to take into account the waste related sections of the BAT Conclusions for the production of cement, lime and magnesium oxide¹.

Secondary materials

This credit continues to fall short of rewarding behaviour that favours GHG emission reductions, toxicity reduction by using recycled materials, alternatives to clinker and not using hazardous or other types of waste (municipal, meat and bone, sludge, etc.).

Conclusions

IUCN and experts from Civil Society welcome CSC's openness during the IUCN-convened process and continued interest in receiving input on the Scheme as it evolves. We are encouraged by the 2017 timeline and especially the intention to initiate a consultation process on Version 1 of the Technical Manual by September 2017 with Version 2 expected in 2018.

¹ 2013/163/EU: Commission Implementing Decision of 26 March 2013 establishing the best available techniques (BAT) conclusions under Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions for the production of cement, lime and magnesium oxide (notified under document C(2013) 1728) Text with EEA relevance OJ L 100, 9.4.2013, p. 1–45 <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013D0163>.

Appendix A – List of CSO representatives

Name	Organization
1. Deviah Aiama	IUCN Global Business and Biodiversity Programme (facilitator)
2. Stefano Barchiesi	IUCN Global Water Programme
3. Maria Ana Borges	IUCN Global Business and Biodiversity Programme (facilitator)
4. Charlie Butt	Birdlife International
5. Giulia Carbone	IUCN Global Business and Biodiversity Programme (facilitator)
6. Jinlei Feng	WWF China
7. Jean-Paul Jeanrenaud	Independent Consultant
8. Myrna Semaan	Friends of Nature Lebanon
9. Jim Schermbeck	Downwinders at Risk
10. Mathias Schluep	World Resources Forum
11. Ramananda Wangkheirakpam	NE-PA
12. Dan Ward	Independent Consultant
13. Ivaylo Hlebarov	Environmental Association Za Zemiata