



Climate Advocacy & Association Review 2025

March 2026

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01

Introduction

Heidelberg Materials is dedicated to driving meaningful transformation within our industry and operations. Our ambition firmly aligns the global Paris Agreement objective of limiting warming to 1.5°C. As an energy-intensive company, we acknowledge our responsibility to continuously reduce the carbon footprint of our production processes and are committed to achieving net-zero greenhouse gas (GHG) emissions across the value chain by 2050.

Through our Strategy 2030 **“Making a Material Difference”**, presented at our Capital Markets Day in Brevik in May 2025, we set out a bold course for accelerated growth, competitiveness, and deep decarbonisation. Notable achievements in 2025 include the deployment of Carbon Capture and Storage (CCS) technology at our Brevik plant in Norway, cutting CO₂ emissions by 400,000 tonnes annually. We also launched world’s largest flash calciner for clay in Ghana, enabling the production of calcined clay cement and reducing the finished product’s carbon footprint by up to 40% while leveraging local resources and creating additional employment.

Heidelberg Materials advocacy efforts are focused towards facilitating our transition to a net-zero built environment by championing policy frameworks that encourage both traditional and advanced decarbonisation solutions. We actively promote the adoption of innovative, low- and near-zero emission building materials, supporting not only our climate ambitions but also industrial competitiveness. Throughout 2025, we proactively engaged with policymakers, business partners, and societal stakeholders to help shape the political and regulatory landscape. Maintaining a transparent and responsible advocacy approach, we regularly review our memberships in trade associations and collaborations with strategic partners to ensure alignment with our climate objectives. We assess our engagement based on five core parameters of sustainable climate and energy policies, focusing on both aligned and non-aligned organisations, as well as our direct climate advocacy and related policy positions.

Our assessment for 2025 confirms that the positions of our regional and national associations are broadly aligned with our own, although differences in tone and emphasis exist based on the maturity and reach of the public climate discussion. Continued dialogue and open engagement remain essential for advancing our climate goals and supporting the global transition to a net-zero future.



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Heidelberg Materials' Climate Targets & Commitments

As one of the world's largest construction material companies, we strive to lead the transformation of the sector globally. Our commitment to the United Nations Framework Convention on Climate Change (UNFCCC) and the Paris Agreement is operationalised through an internal group-wide CO₂ roadmap, which includes country-specific and even plant-specific CO₂ roadmaps.

Heidelberg Materials' climate commitments are outlined in our [Climate Policy](#) and [Climate Transition Plan](#). In alignment with the Paris Agreement, the company is dedicated to providing near-zero cement, with the objective of achieving net-zero GHG emissions across the entire value chain by 2050.

As part of this commitment, Heidelberg Materials has pledged to reduce gross scope 1 and 2 GHG emissions by 95% per tonne of cementitious material by 2050, using 2020 as the base year.

Additionally, we aim to decrease absolute scope 3 GHG emissions by 90% within the same timeframe. The target boundary includes land-related emissions and removals associated with bioenergy feedstocks.

Notably, in February 2025, the Science Based Targets initiative (SBTi) validated these long-term carbon reduction targets, confirming their consistency with the SBTi Corporate Net Zero Standard and alignment with a 1.5°C trajectory.

Earlier, at the beginning of 2023, SBTi had already validated the Heidelberg Materials' near-term reduction targets for 2030. These targets include a commitment to reduce gross scope 1 and 2 GHG emissions by 26.7% per tonne of cementitious material by 2030 from a 2020 base year, and to reduce absolute scope 3 GHG emissions from purchased goods and services by 25% within the same

The Group Climate Policy is binding and applies company-wide, serving as a guide for all our advocacy activities in the markets where Heidelberg Materials operates. This includes both direct political engagements and broader stakeholder outreach involving associations, international and societal organisations, communities, and sectoral business partners.



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Responsible Lobbying & Climate Advocacy Governance

Heidelberg Materials recognises the importance of conducting political engagements in a fair and transparent manner. The company is committed to maintaining a constructive dialogue with political stakeholders, ensuring that all interactions are open and based on mutual respect.

To foster transparency, Heidelberg Materials systematically reports on its advocacy activities. The company publishes the names of its representatives in the relevant transparency registers and actively supports the establishment of such registers in jurisdictions where they do not yet exist. These registers provide additional details, including information about meetings conducted and our input provided for public consultations:

- [EU Transparency Register](#) (europa.eu); Identification number: 81970148701-15
- [Registereintrag “Heidelberg Materials AG”](#) – Lobbyregister beim Deutschen Bundestag

All political engagements undertaken by Heidelberg Materials are conducted in strict compliance with the company’s Code of Business Conduct and other relevant policies, including the Climate Policy, Data Protection Policy, Compliance Policy, and Anti-Corruption Guidelines. Policy positions and related documents are accessible via the following link: [ESG Documents and Policies | Heidelberg Materials](#).

Heidelberg Materials requires its representatives to always clearly identify themselves by name and affiliation when acting on behalf of the company. Furthermore, all information provided during political engagements is ensured to be factual and accurate, reflecting the company’s commitment to integrity in all lobby activities.

In addition, Heidelberg Materials has a strong association management overseen by the Group Public Affairs function. It confirms alignment with our positions and helps to ensure that our associations strictly adhere to transparent and responsible lobbying rules and guidelines. A regular exchange with company representatives has been established to ensure the associations’ lobbying is in line with the goals of the Paris Agreement. The progress of our work with our associations is quarterly reviewed with our Chief Sustainability & New Technologies Officer and the Board Member responsible for associations.



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Climate Policy Engagement in 2025 – Advancing Industrial Decarbonisation

With our Strategy 2030: “**Making a Material Difference**”, presented at our Capital Markets Day in Brevik in May 2025, we set out an ambitious pathway for accelerated growth, competitiveness, and deep decarbonisation. The strategy focuses on the realisation of immediate, conventional decarbonisation levers, including increased use of alternative fuels and a systematic reduction of clinker through supplementary cementitious materials (SCMs), as well as the deployment of First-of-A-Kind (FAOK) projects, such as CCUS.

A key milestone was the successful operation of the world’s largest flash calciner for clay in Ghana, reducing the carbon footprint of the finished product by up to 40%. In Poland, we commissioned an industrial pilot plant for enforced carbonation, marking the first large-scale deployment of our patented ReConcrete process, which combines circularity and decarbonisation and serves as a scalable blueprint for global rollout. Together, these projects underpin the continued expansion of evoBuild®, our portfolio of lowcarbon and circular products.

A historic inflection point was reached in June 2025 with the official opening of Brevik CCS, the world’s first industrial-scale carbon capture and storage facility in the cement sector. Capturing around 400,000 tonnes of CO₂ annually, Brevik enables the production of evoZero®, the world’s first carbon captured nearzero cement – already used by customers across Europe in flagship construction projects. Brevik is only the beginning: following a funding agreement with the UK Government, our Padeswood CCS project in North Wales entered the construction phase at the end of 2025. The project is set to capture around 800,000 tonnes of CO₂ per year, making it the world’s first carbon capture facility that enables the fully- decarbonized production of cement.

To scale these types of projects across our markets, we advocate for the necessary political and regulatory frameworks towards global, regional and national organisations in close collaboration with our value chain and societal partners. Our key policy asks include (see Annex I for more details):

- Implementing strong and predictable **carbon pricing mechanisms** complemented by robust carbon-leakage protections, such as the European Carbon Border Adjustment Mechanism (CBAM), to drive decarbonisation.

- Creating **lead markets and corresponding procurement law** to stimulate demand for low-carbon and circular products and developing internationally compatible standards.

- Supporting the implementation of frameworks for **Carbon Capture, Utilisation, and Storage** (CCUS) and developing infrastructure for CO₂ transport and storage.

- Emphasising the importance of **viable business cases** as a prerequisite for a successful transformation and **state funding** for large-scale CCUS projects during the transition period, as many projects are not yet economically viable.

- Promoting the growth of **renewable energy** sources under economically viable conditions.

- Advocating for **circular economy** solutions to support a circular economy, such as the targeted processing and reuse of construction and demolition waste.

- Enhancing **access to alternative fuels**, including waste-based biomass.

Indirect exchange via our trade associations and strategic partnerships

Heidelberg Materials engages with national trade associations in countries where we have a significant footprint. We pursue strong and broad engagement within these associations; often represented at the level of presidents/chairpersons, board members, working group chairs, and working group members.

In 2025, we continued active participation globally and regionally, with Group management consistently advocating for ambitious climate policies aligned with our climate policy and sustainability roadmap, setting a standard for our employees and representatives.

Amongst others, Heidelberg Materials' CEO, Dr Dominik von Achten, and CSO and Member of the Managing Board, Dr Katharina Beumelburg, joined the World Economic Forum in Davos to discuss the role of AI and technological disruption in industrial decarbonisation.

In July, Dr Beumelburg also took part in the launch of the 'European Leaders for Growth and Competitiveness initiative' by the World Economic Forum in Brussel, Belgium. The Business Delegation that met with high-level European policymakers focused on industrial decarbonisation, infrastructure roll-out, energy markets and emerging technologies while emphasising public-private collaboration as an enabler.

Through our collaboration with the Global Cement and Concrete Association (GCCA), which represents 80% of global cement production outside China (as well as some Chinese members), we continued to engage in a sector-wide push towards industrial decarbonisation, in particular also in emerging markets. The GCCA 2050 Net Zero Roadmap sets out the pathway for the global cement and concrete sector to reach net-zero emissions by 2050 and serves as a blueprint for the creation of regional and national roadmaps.

In April, we supported the GCCA in the launch of its Low Carbon Ratings for cement and concrete; a global rating system that will enable cement and concrete to be identified based on their carbon footprints.

In June, Dr Dominik von Achten was elected President of the GCCA at the General Assembly in Mexico City, and he continues to serve as President of the German Construction Materials Association, bbs.

Throughout the year, we also pursued our collaboration with the World Business Council for Sustainable Development (WBCSD) on different work streams including Transformation of the Built Environment, Circularity, Nature Based Solutions as well as Positive Policy Engagement.

In Europe, Area Managing Board member Jon Morrish was appointed President of the European Cement Association, Cement Europe, in June 2025. Cement Europe's roadmap sets out how CO₂ emissions will be reduced across the value chain, projecting a 37% reduction in cement production emissions and a 50% reduction across the value chain by 2030, and carbon-neutral cement by 2050 with potential for net-negative emissions.

As part of Cement Europe and national associations, we actively engaged on the 'Clean Industrial Deal' agenda, emphasising an effective EU Emissions Trading System combined with a robust CBAM implementation, green demand creation, and access to affordable low-carbon energy. In December, we led the publication of the 'Cement Europe Action Plan' detailing specific policy positions.

Direct exchange with political decision makers and non-governmental stakeholders in 2025

To further strengthen our dialogue with key decision makers, Heidelberg Materials goes beyond indirect representation through associations by actively engaging in direct, proactive outreach throughout the year.

At the global level, our Chief Sustainability and New Technologies Officer, Dr Katharina Beumelburg, participated in several high-profile events, including the Munich Security Conference in January, CeraWeek in March, and New York Climate Week in September. These engagements underscore our commitment to driving climate action and technological innovation on the world stage.

In November, we took part in COP30 in Belém, Brazil, where we highlighted decarbonisation strategies tailored for emerging markets and advocated for mechanisms to support green demand. Heidelberg Materials signed the 'Belém Declaration' by the United Nations Industrial Development Organisation (UNIDO) and the Cement Breakthrough initiative, calling on governments to set binding green public procurement targets by COP31. Our team also contributed to ministerial panels organised by the German government, LeadIT, and the Industrial Transition Accelerator (ITA).

We further collaborated in GCCA workshops alongside the OECD, Climate Club, Clean Energy Ministerial, and the Cement Breakthrough, focusing on financing deep decarbonisation including carbon capture, utilisation, and storage (CCUS).

In December, we attended the annual Industrial Carbon Management (ICM) Forum, hosted by the Greek government and the European Commission in Athens, Greece, reinforcing our commitment to collaborative climate solutions across the industry.

At the regional level, 2025 marked significant progress for our CCUS initiatives. In June, we inaugurated the world's first industrial-scale carbon capture and storage facility in the cement sector in Brevik, Norway. Among the more than 320 guests, the opening ceremony was honored by the presence of HRH Crown Prince Haakon of Norway, Minister of Energy Terje Aasland as well as senior representatives from governments and international authorities across the globe, industry, NGOs and start-ups. In addition, Brevik welcomed ministerial delegations from countries including Thailand, Malaysia, Indonesia, the United States, Poland, Italy, and France throughout the year showcasing how cement production can be decarbonised.

Later that year, we also hosted the Global Concrete Decarbonization Convening, bringing together more than 30 organisations and supported by NGOs such as Climate Imperative, ClimateWorks Foundation, European Climate Foundation, and the Global Industry Hub.

In the United Kingdom, Heidelberg Materials reached the Final Investment Decision (FID) in September 2025 for the Padeswood CCS project, which will become the first facility enabling fully decarbonised cement production. The project is supported by the UK government as part of the HyNet Track 1 industry cluster. Additionally, we were awarded grants from the European Union's Innovation Fund grant for four major CCUS projects across Europe, further advancing our leadership in sustainable industrial transformation.

Non-exhaustive list of Heidelberg Material's participation in major conferences and summits in 2025.

Event	Company Representative	Date / Location	Subject
COP30	Dr Katharina Beumelburg	10-21 November 2025 Belém, Brazil	Climate cooperation
10th Annual Conference Stiftung KlimaWirtschaft	Dr Katharina Beumelburg	6 November 2025 Berlin, Germany	German climate agenda
Cement Europe Annual Conference	Jon Morrish	15 October 2025 Brussels, Belgium	Action plan for cement to enable the transition
New York Climate Week	Dr Katharina Beumelburg	21-28 September 2025 New York, USA	Accelerating climate action
Cement Europe General Assembly	Jon Morrish	11-12 July 2025 Brussels, Belgium	Industrial competitiveness and decarbonisation
European Leaders for Growth and Competitiveness initiative launched by the World Economic Forum	Dr Katharina Beumelburg	July Brussels, Belgium	Low-carbon infrastructure, energy markets and emerging technologies
bbs Annual Meeting	Dr Dominik von Achten	9 July 2025 Berlin, Germany	Circular and decarbonization initiatives
GCCA Annual Conference	Dr Dominik von Achten	2-6 June 2025 Mexico City, Mexico	Net-Zero Accelerator, low-carbon ratings, and new market mechanisms
CeraWeek	Dr Katharina Beumelburg	10-14 March 2025 Houston, USA	Decarbonisation of heavy industry
Energy Transition Outlook Germany	Christian Knell	25 February 2025 Frankfurt/Main, Germany	Technologies for the transition of hard-to- abate sectors
Munich Security Conference	Dr Katharina Beumelburg	14-16 February 2025 Munich, Germany	Technology openness in combating climate change
World Economic Forum	Dr Dominik von Achten	20-24 January 2025 Davos, Switzerland	AI-driven innovation, global cooperation and the transition toward a more sustainable future

05

Trade associations review

Methodology of reviewing our engagement in associations

In our 2025 Climate Advocacy & Association Review, we reassessed whether a trade association's lobbying is aligned with the goals of the Paris Agreement or not. The review covers all countries where we operate, as well as the associations of our three main business lines – cement, aggregates, and ready-mixed concrete.

Based on our climate commitments and Group Climate Policy, we seek alignment of associations with two of our main advocacy principles:

- Full support for the Paris Agreement and its targets,
- Policies that support meeting our CO₂ reduction target for 2030 and that enable a transition to Net Zero by 2050 at the latest.

Given their relevance for global GHG emissions, cement trade associations were additionally assessed in more detail. It was examined whether they:

1. are aligned with the Paris Agreement;
2. have a corresponding CO₂ roadmap;
3. advocate for (the introduction of) carbon pricing;
4. advocate for the support of advanced technologies, e.g. CCUS;
5. advocate for the support of low-carbon products; and
6. advocate for the support of renewable energies.

The level of alignment was then categorised based on the outcome of the assessment of the six main criteria:





- **Fully aligned:** The Association meets all 6 defined criteria.
- **Partially aligned:** The Association meets between 1 to 5 of the defined criteria.
- **Misaligned:** The Association does not meet any of the 6 defined criteria.



































































































Findings of the Association Review

In 2025, Heidelberg Materials financially contributed to trade associations and tax-exempted groups with an estimated amount of €14.6 million globally. These associations used around €3.5 million for lobbying activities according to information they provided or internal estimates. Contributions include Heidelberg Materials' memberships in cement, aggregates, and ready-mixed concrete associations. The largest financial contributions in 2025 were made to the German, French & U.S. cement trade associations (i.e. VDZ, France Ciment, PCA). On direct political engagements, the company spent a total of approx. €2.6 million for the same period. The company does not financially contribute to political parties, campaigns, or referendums.





Out of the 28 reviewed cement trade associations, 17 are fully aligned with the goals of the Paris Agreement according to our methodology. Ten associations are partially aligned, and one association is misaligned with the goals of the Paris Agreement.

The advocacy of almost all ready-mixed and aggregates trade associations covered in this review are consistent with the Heidelberg Materials' position on climate.

	Aligned
	Non-aligned
	Unknown (considered non-aligned)
	Not Applicable

Country / Region	Name	Alignment with Paris Agreement...		Engagement in support of...			
		Overall Association's engagement	National CO ₂ Roadmap	Carbon pricing schemes	Advanced decarbonisation technologies	Demand for low-carbon products	Low-carbon and renewable energy
Australia	Cement Concrete & Aggregates Australia (CCAA)						
Bangladesh	Bangladesh Cement Manufacturing Association (BCMA)						
Belgium	Febelcem						
Bulgaria	Bulgarian Association for Cement Industry (BACI)						
Canada	Cement Association of Canada (CAC)						
Czech Republic	Svaz výrobců cementu ČR						
Egypt	Chamber of Building Materials Industries						
France	France Ciment						
Germany	Verein Deutscher Zementwerke (VDZ)						
Ghana	Chamber of Cement Manufacturers Ghana (COCMAG)						
Greece	Hellenic Cement Industry Association (HICA)						
India	Cement Manufacturers Association (CMA)						
Indonesia	Asosiasi Semen Indonesia						
Italy	Italian cement producers association (AITEC)						
Kazakhstan	QazCem						
Morocco	Association Professionnelle des Cimentiers (APC)						
Netherlands	Cement and Beton Centrum (C&BC)						
Poland	Stowarzyszenie Producentów Cementu (SPC)						
Romania	National Association of Cement Producers (CIROM)						
Spain	Oficemen						

Continued...

	Aligned
	Non-aligned
	Unknown (considered non-aligned)
	Not Applicable










































Country / Region	Name	Alignment with Paris Agreement...		Engagement in support of...			
		Overall Association's engagement	National CO ₂ Roadmap	Carbon pricing schemes	Advanced decarbonisation technologies	Demand for low-carbon products	Low-carbon and renewable energy
Russia	Cement Producers Union						
Thailand	Thai Cement Manufacturers Association (TCMA)						
UK	Mineral Products Association (MPA)						
USA	Portland Cement Association (PCA)						
Global	Global Cement & Concrete Association (GCCA)						
	World Economic Forum						
	World Business Council for Sustainable Development						
Europe	Cement Europe (formerly Cembureau)						

Table: Review of cement trade associations and their lobbying activities in alignment with the goals of the Paris Agreement.

Engagement process to continue ensuring alignment

Heidelberg Materials will continue to act on the findings raised in this Association Review. Based on the latest standards and best practice, we refine our survey annually.

If an association's position on a strategically important issue differs from ours, we will increase our engagement and signal our dissent to improve the alignment or to demand the association does not take a position.

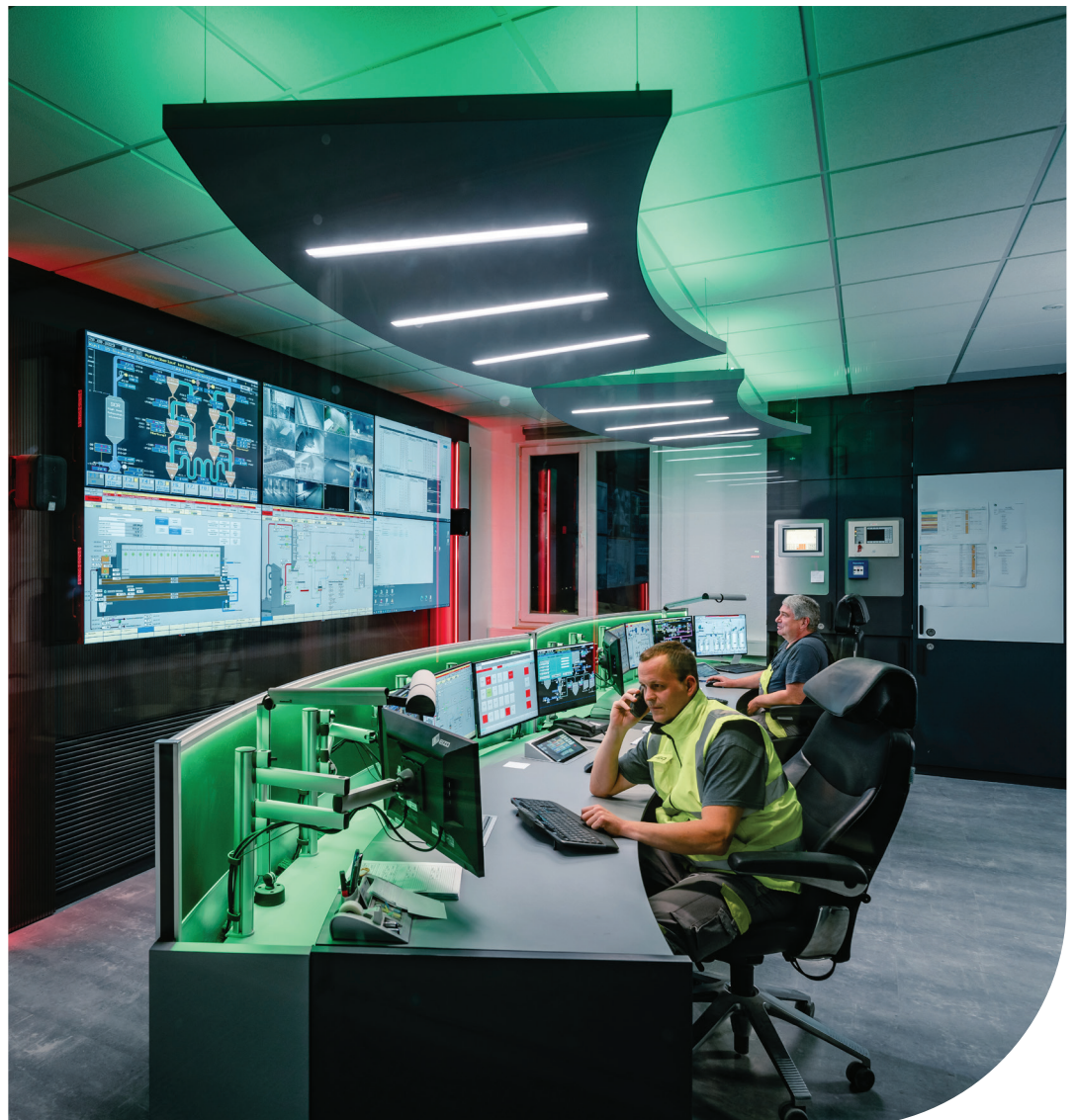
If the association repeatedly pursues policies and actions that are contrary to Heidelberg Materials' positions or if reasonable measures to advance the goals of the Paris Agreement are repeatedly opposed, we will publicly state our disagreement, assess the association's performance and its membership value, and finally review if exiting the association is appropriate. We believe that the latter is only appropriate as a last resort since aligning positions as a sector or industry across companies and associations is a precondition for achieving a net-zero economy.

ANNEX – Climate Policy positions

Carbon pricing

The transformation towards Net Zero will require significant investments along the entire sustainable construction value chain. When designed well, carbon pricing can be an effective instrument to incentivise emission reductions, as it internalises external carbon cost and incentivises investment in emission reduction.

- Price signals must be reliable and enable near-zero or carbon-neutral production to become a viable business case. Speculation in the market and high price volatility need to be avoided. Cost-effective carbon pricing systems should consider sectoral starting points and abatement costs to ensure emissions will fall below predetermined emissions targets.
- A global framework would be the best option to ensure a global level playing field, but it seems out of reach for the time being. In absence of a global carbon price, national or regional carbon pricing schemes can also be effective but need to be combined with carbon leakage protection to negative competitive effects. The EU Carbon Border Adjustment Mechanism is an example.
- In addition, these instruments must be accompanied by demand-side measures to ensure the uptake of low-emission and near-zero products.



Lead markets and procurement law

Already today, Heidelberg Materials can offer low-carbon construction products with a CO₂ footprint reduced by up to 70% or with a high content of recycled materials. evoZero, our carbon captured near-zero cement, and evoBuild together provide a full-range sustainable product portfolio. To ensure the uptake of more sustainable construction materials and achieve market access, measures that stimulate demand are required. Green lead markets is a demand-side mechanism that can complement other support mechanisms, such as funding. Through driving the demand for more sustainable products, sustainable markets are ramped up while also relieving public budgets.

The pursuit of creating lead markets for basic materials is reflected in various upcoming legislative proposals such as the EU Industrial Accelerator Act and changes in several countries' procurement legislation.

- Create binding framework conditions through laws, regulations, and processes that give preference to low-emission, near-zero and circular cements and concretes in procurement and provide for new incentives for all kinds of customers.
- Raise awareness for benefits and necessity of the endorsement of low carbon products.
- Build expertise at all levels – in politics and in public authorities, in public procurement, as well as among customers and end consumers from the private sector.
- Define clear low-carbon cement and concrete thresholds to enhance usability and effectiveness for all stakeholders. Use harmonised and robust labels for cement and/or concrete, based on verified, transparent, and regularly updated standards, to guide procurers to make informed decisions.
- Further develop norms and standards in such a way that they support and accelerate rapid market penetration.
- Pave the way for new sales mechanisms such as mass-balancing and book-and-claim to enable market access for new business models like fully decarbonised products through the use of CCUS. Robust chain-of-custody (CoC) models allow a wider customer base to benefit from low carbon products and enhance the business case for CCUS projects.



Carbon capture, utilisation, and storage (CCUS)

Two thirds of direct emissions in cement production are unavoidable process emissions from calcinating limestone during the clinker production process. Carbon capture, utilisation, and storage technologies are currently one of the main solutions for removing unavoidable process emissions and must therefore be industrialised and deployed at scale.

- The rapid development of national and international CO₂ transport infrastructure (ships, railway, pipe- lines) to connect emission sources with storage sites, including inland locations, is a necessary precondition for CCUS.
- Public funding for the deployment of large-scale CCUS technologies needs to be ensured. This must include support for capital investments as well as for increased operational costs, through instruments such as Carbon Contracts for Difference.
- Emissions avoidance from CCU and BioCCS should be recognised within carbon pricing schemes to incentivise their application. In addition, the capture and storage of biogenic carbon emissions enable negative emission capabilities to offset residual emissions. This should also be recognised in carbon accounting, for example through the issuance of tradeable negative emissions certificates within carbon pricing schemes.

Renewable energy

The transformation process will require the rapid phase-out of fossil fuels and a substantial ramp-up of renewable energy. At the same time, climate mitigation technologies will drive increased energy demand.

- Policies must ensure access to sufficient renewable and low-carbon energy at competitive cost. This must include generation capacity as well as relevant networks.
- Co-processing must be recognised as a sustainable method allowing the effective substitution of fossil fuels and primary raw materials with non-recyclable, residual and biomass waste.
- Policies should also adopt a coherent biomass and alternative fuel strategy to ensure sustainability criteria are respected while increasing access to waste-based resources. Landfilling should be banned or heavily taxed.



Circular economy

Heidelberg Materials' goal is to close the carbon and materials cycle. Using by-products from other industrial sectors in the production of clinker and cement, as well as recycling demolition concrete, enables more resource-efficient production and reduces CO₂ emissions.

- Rerouting material flows towards circular production should be incentivised by revising demolition waste management regulations, including separation of waste streams on site.
- The market access for circular products needs to be improved by revising product, building and construction standards.
- Demand for recycled products needs to be stimulated by providing financial incentives for private customers and by implementing green public procurement schemes that consider full life-cycle-analysis, carbon footprint, and other sustainability-related aspects such as recyclability.

Alternative fuels

To reduce Heidelberg Materials' reliance on fossil fuels and thus CO₂ emissions, the use of alternative fuels is essential. Ensuring reliable and practical access to such fuels is therefore necessary.

- Access to alternative fuels must be ensured.
- Classification of alternative fuels must be practical to keep bureaucratic burden low.



