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Recommendation:CARB should identify specific examples of alternative technologies the cement industry can utilize to mitigate emissions. For example, incorporating recycling practices, such as crushing construction rubble and using it as building blocks.

Other possible recycling practices can be the use of steel which is 85% reused and is the most recycled industrial material. While recycled plastic is considered some of the best building material replacements.

Recommendation CARB needs to clarify in more detail, how just transitions would be developed and implemented in the manufacturing industry’s workforce. For example, when workers are transitioning from oil and gas refineries to renewable energy, the needs of the workers and their families are distributed. This includes not sticking a label on this transition to “green jobs” as the definition is vague and already there is a connotation associated with that term. CARB should emphasize examples of how the industry can ensure just transitions for the workers. This can include education on how the workers can make the transition, workforce training, and any policies that may affect the workers and their families. According to the Environmental Defense Fund, “In this transition, prioritizing fairness for workers and communities that have historically depended on fossil energy economies will be important—what many refer to as a just transition. This research then can lead to policy options for facilitating the transition easily and provides an opportunity for protection of the workers and their families.”

Recommendation: CARB acknowledged a timeline of a proposed scenario for energy demands in buildings. CARB should include a timeline of transitioning to renewable energy and take into consideration the challenges that could occur while considering potential solutions. For example, limitations. There could be technological, economical, and capacity limitations. Infrastructure is another barrier and CARB should address the challenges as well as the solutions such as providing incentives for using renewable energy that is affordable for everyone. Providing education on why we should transition to renewable energy, and slowly start to make the transition to renewable energy by installing EV stations or using recycled materials to build infrastructure.

Recommendation: CARB needs to address the transparency of providing information on different technologies, substituted materials, and the feasibility of these technologies. CARB needs to be more transparent about sharing this information with the public. There could be examples from other countries or states that can be used as a guide to receive information of this transition. Sweden, Switzerland, Norway, Finland, and Denmark are all countries that are leading the transition and should be looked at for strategies. For example, HYBRIT Steel manufacturing in Europe produced one million tons of hi-grade steel for auto manufacturers in 2021.

Recommendation: CARB has acknowledged the short-lived pollutants of “black carbon, methane, and fluorinated gasses including hydrofluorocarbons [HFCs]).” However, CARB should explain how HFCs are harmful to public health and the environment. For example, include a table that shows the effect of the HCFs on public health and how it will contribute to climate change. CARB acknowledges different strategies on how to reduce HCFs. There should be a section that includes the American Innovation and Manufacturing Act that mandates these HFCs be reduced to 85% over a period ending in 2036. Comparing this act with how California is doing in following this act.

­­­\_Samantha Meneses\_\_\_\_\_\_\_\_

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