



EU ETS reform after COP21 - Genuine safeguards are needed -

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Energy Forum – 21 April 2016



Need for global level playing field



video



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COP21 major outcomes



,but are these National Contributions similar?



National contributions are very diverse



How do they compare?

Examples of diversity of INDCs

EU

At least 40% below 1990 levels by 2030

China

-Peak of CO2 emissions by 2030 -lower CO2 emissions per unit of GDP (60-65% below 2005 levels) by 2030

US

26-28% below 2005 levels by 2025

Japan

26% below 2013 levels by 2030

Singapore

36% reduction in **emission intensity** from 2005 levels by 2030

Others for example

X % below Business as Usual level by 2030



Source: Essenscia

EU is the most ambitious region



With -40% absolute emissions, Europe has the highest ambition



EU ETS Reform: provide safeguard to retain and attract industry



Genuine safeguard against <u>unilateral direct and indirect</u> carbon costs for carbon leakage exposed sectors, using precautionary principle

This means that the EU ETS should ensure

No additional carbon cost at best performer level

By at least:

- 1. Safeguarding available free allowances for production and growth
- 2. Not more or less free allocation than eligible at declining and increasing production (dynamic allocation)
- 3. Benchmarks based on real data
- 4. Carbon cost compensation for **indirect costs**



Genuine safeguard requires sufficient allowances buffer

This can be done by:

- 1. **Re-calculation of the auctioning/free-allowances share (57%/43%)**
 - Current calculation is overestimating auctioning share, because based on free allocation estimates of phase 3 without taking new entrants reserve or NER300 into account
- **Expand the "reserve for competitiveness and growth"** by 2.
 - Adding non-allocated free allowances from phase 3
 - Supplementing from MSR

Modernization fur Innovation fund NE 400 Free allocation Auctioning by MS

See also:

, IFIEC position paper: "Avoiding a reduction factor on carbon ..." of 2 March 2016 Kifiec europe



With dynamic allocation, growth is not punished

With **dynamic allocation**, meaning:

- Actual production based free allocation (Year X-1)
- Without production thresholds
- .. windfall profits are avoided and growth is not punished

If production increases:

If production reduces:





Benchmarks based on real EU data

Example ammonia production:



Automatic benchmark cuts (not based on real data) would reduce free allowances <u>beyond</u> best performer level.



Indirects are major part of carbon costs

Example non-ferrous metals:







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Retain and attract sustainable industrial production in Europe

Innovation happens where there is a healthy growth and investment climate.



Only in such **conditions**, European industry can deliver solutions that are needed to reach the climate targets and to **combat global warming**.

Healthy investment climate needs an ETS that provides genuine safeguard against direct and indirect carbon costs for CL sectors, that means:



Safeguard for availability of free allowances for production and growth



Not more or less free allocation than eligible at declining and increasing production (**dynamic allocation**)



Bases benchmarks on real data



Carbon cost compensation for indirect costs

