

Benchmarking Preventing Carbon Leakage & Achieving Emission Reductions

Preliminary views of the Aluminium Industry

CEPS Task Force on Benchmarking for the EU ETS
and Beyond

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General Objective of Benchmarking

- **Benchmarking** is appropriately identified by the ETS Directive as the **default framework** for free allocations
- Already a process that the **aluminium sector uses formally** to benchmark its emissions on a global level
- The ETS Directive is unambiguous in the desire to **protect European industry from the risk of carbon leakage**
- However the **current methodology** being pursued on the creation of benchmarks **may not achieve this objective**
- It is important to assess not only the relative position within a sector but also the **overall economic impact of emission reductions for the sector**

Main issues (1): “spread factor”

- In sectors that have a **large degree of variation** in processes and emissions, the application of a 10% best benchmark will not protect against carbon leakage
- The **spread factor**: ratio between the best and worst performers can be high
- Example:
A **spread factor of 2** would mean that the worst performer would be allocated **only half the number of allowances** of the best performer, regardless of the ability of the installation to improve, which would probably lead to closing down

Spread factor for all?

- The consultation paper suggests that a suitable spread factor for a single benchmark **should be 1.2**
- This concept should be applied **as a general rule for the use of benchmarks**
- However to ensure that the risk of carbon leakage is adequately mitigated the **economic impact** linked to the volume of emissions needs also to be taken into account
- **Alternative allocation methods** are needed to maintain incentives to improve performance & recognise early movers

➔ Assess **economic impact** of benchmarks vs. alternative methods

Main issues (2)

- Limited number of benchmarks & based on **products** is OK where applicable, but different alternatives may be required when there are **too many products** out of same process (e.g. rolling) or major **differences in technology** for same product
 - Need to account for **recycling** (re-melting), to find a balance between the environmental gain from recycling vs. use of primary resources
 - Slightly higher emissions from re-melting
 - Re-melting technology (fossil fuel vs. electricity)
 - Switching not possible in all sectors, unless complete refurbishment of plants
- ➔ Benchmarking should not lead to **disincentives** for environmentally beneficial processes (e.g. recycling)