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CEPS Carbon Market Forum

29 June 2015, Brussels

EU ETS structural reform: what is on the agenda?

Comments from BDI

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Other elements to consider

- Stick to **trading periods** (fixed intervals probably better manageable)
- **Scope** shouldn't be changed (would increase complexity even further)
- **LRF**: reduction obligations need to be oriented on feasible reduction possibilities;
sectors' post-2020 roadmaps provide important guidance
- **Effective carbon leakage protection** still a „must have“ after Paris
- **Dormant ETS provisions**: no to border adjustments,
yes to Art. 24a (COM to develop guidance to make 24a operational)

Benchmarks:

Benchmarks should be realistic and comprehensible, and should be adjusted *only* if technical progress has genuinely been made, i. e. if the benchmarks reflect the state of the art (BAT). Only one update per trading period.

Production levels:

The adjustment of allocations to reflect changing production levels (activity-based allocation) is expressly welcomed.

Carbon leakage:

The importance of an effective carbon leakage regime is growing. The most CO₂-efficient installations in the EU must not be forced to carry any additional and unilateral ETS-related burdens.

Indirect compensation:

The regime for compensating indirect CO₂ costs (electricity price offsets) should be maintained.

Thank you!

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