

**EUROALLIAGES' REPLY TO THE PUBLIC CONSULTATION
ON THE FUNCTIONING OF THE AUCTIONING REGULATION
PURSUANT TO THE SCHEME FOR GREENHOUSE GAS EMISSION
ALLOWANCES TRADING WITHIN THE COMMUNITY (EU ETS)**

EUROALLIAGES, the European association of ferro-alloys and silicon producers representing more than 95% of the sector, wishes to react to the European Commission's public consultation on the Auctioning Regulation.

EUROALLIAGES' members have entered the EU ETS in its Phase 3 and are therefore directly concerned by this piece of legislation.

The European ferro-alloys and silicon producers would like to insist on the need for transparency when it comes to reforms of the EU ETS system.

Should the Auctioning Regulation be revised again in the future, this needs to be done after a thorough impact assessment and while taking into account the global competitiveness of European industry.

With regard to the Market Stability Reserve, it should be ensured that its functioning will be accompanied by transparency measures addressing the concerns of the market actors, and especially of the European industry.

EUROALLIAGES reiterates its support to the principle of the EU ETS as a market-based instrument exempt of political intervention and where the global competitiveness of European industry is adequately ensured.

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ANNEX – P1 TO P11

P.1 What is your profile?

[1] The category of micro, small and medium-sized enterprises (SMEs) is considered to be made up of enterprises which employ fewer than 250 persons and which have an annual turnover not exceeding EUR 50 million, and/or an annual balance sheet total not exceeding EUR 43 million (are defined in the [EU recommendation 2003/361](#)).

* Please explain:

* Please enter the name of your business/organisation/association etc.:

P.2 Please enter your contact details:

* Street & number:

* Office/apt:

* Locality:

* Postal code:

* Country:

* Telephone:

* Email:

P.3 If relevant, please state if the sector/industry you represent falls within the scope of the EU ETS:

* P.4 Please state what sector you/ the entity you represent is active in/ represents:

Select all that apply

- ☐ Electricity generation
- ☐ Non-electricity energy sector
- ☐ Non-energy-intensive manufacturing sector
- ☒ Energy-intensive manufacturing sector
- ☐ Aviation sector
- ☐ Financial sector
- ☐ Other

P.5 Since the introduction of large scale auctions of allowances (from 2012 to 2015) have you/ the entity you represent participated directly or indirectly in the primary market for allowances (auctions of allowances)?

Select all that apply

- ☐ Yes, directly
- ☐ Yes, via intermediary
- ☒ No

* P.6 In the past year (2015) have you/ the entity you represent directly or indirectly participated in the primary market for allowances (auctions of allowances)?

- ☐ Yes, directly
- ☐ Yes, via intermediary

☒ No

* P.7 Have you/ the entity you represent ever been denied direct access to auctions of allowances?

* P.8 In 2015 have you/ the entity you represent participated in the secondary market for allowances (in non-auction exchanges or over the counter)?

Select all that apply

☐ Yes, directly in non-auction exchanges

☐ Yes, via intermediary in non-auction exchanges

☐ Yes, directly over the counter

☐ Yes, via intermediary over the counter

☒ No

* P.9 From 2012 to 2014 have you/ the entity you represent participated in the secondary market for allowances (via non-auction exchanges or over the counter)?

Select all that apply

☐ Yes, directly in non-auction exchanges

☐ Yes, via intermediary in non-auction exchanges

☐ Yes, directly over the counter

☐ Yes, via intermediary over the counter

☒ No

* P.10 Please indicate your preference for the publication of your response on the Commission's website: (Note that whatever option is chosen, your contribution may still be subject to requests for 'access to documents' under Regulation 1049/2001):

☒ Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication;

☐ Anonymously: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication;

☐ Not at all — please keep my contribution confidential (it will not be published, but will be used internally within the Commission).

P.11 Transparency Register ID number (if you/ the entity you represent is registered):