

## **Internet Consultation of the Commission regarding Back Loading of Certificates in the Auctioning Process of the EU ETS**

### **MWV Position**

MWV is against an intervention into the established rules and processes for auctioning of certificates.

- Current claims for a “setting aside” of EUAs are not in line with the basic principles of the EU ETS. Core element of the EU ETS is a defined emission reduction target – and not a particular price level for the EUAs.
- The EU Emission Trading Scheme is working successfully. The reduction target will be achieved. There is no reason for any intervention.
- The German refineries need regulatory clarity to make investments. Questioning the established framework for the EU ETS phase 3 interferes with this target.
- German refineries are under severe economic pressure from competitors from outside the geographical area of the EU ETS. Setting aside EUAs would impair this already sensitive situation by increasing the cost burden.

For further details MWV is referring to the position paper filed in this consultation by EUROPIA, the European association of the petroleum industry. The EUROPIA paper is fully supported by MWV.

#### *About MWV:*

- *MWV is the German Petroleum Industry Association*
- *MWV is a non-profit organization with 11 Members*
- *For more details on MWV see: [www.mwv.de](http://www.mwv.de)*