

#### **Solutions for an improved ETS**

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ETS Review Group meeting on 21/22 May 2007





#### **ETS Review objectives**

#### ETS design should be

- enabling industry to meet, in a more cost-effective manner, emission reduction goals
- consistent with efficient growth and competitiveness
- globally compatible
- minimizing competitive distortions between sectors or installations inside and also outside the EU



#### ETS design and competitiveness

#### **Competitive impacts**

- indirect costs through electricity prices ('windfall profit' issue)
- administrative costs e.g. from monitoring, reporting and verification requirements
- compliance costs for direct emissions



#### ETS design and competitiveness

- The chemical sector is vulnerable
- We act in global markets and are unable to pass on ETS costs, i.e. impact on electricity price
  - The chlor alkali industry output the electricity cost of the full manufactured cost is about 50%. Some 60% of the EU chemical industry as a whole is itself dependent on some form of chlorine product supply.





# Targeted introduction of performance-based allocation (e.g. through benchmarks) to large emitting, homogenous processes

 Other activities may remain allocated with reference to historical emissions where this is the most workable methodology





#### Linking allocation to production

- Helps meeting better allocation needs
- Addresses issues of
  - relocation of production ("carbon leakage")
  - binding of market share
  - 'windfall profits'



#### **ETS design: Solutions**

# Small emitters must be excluded from EU ETS since their participation is not cost effective

- The European chemical industry consists of some 27.000 SMEs (small and medium size enterprises)
- UK Environment Agency: Operators below 25KtCO2/a have total costs of participation of €3/tCO2 to > €8/tCO2



#### **Auctioning aggravates ETS impacts**

- Theoretically, auctioning of allowance would be an ideal way of allowance allocation - if applied world-wide
- Auctioning limited to the EU will result in a
  - large up-front payment which will harm global competitiveness of EU business and
  - remove funding for research and development, innovative solutions for climate change



#### Recycling of auctioning revenues

#### **Challenges:**

- ETS impacts on competitiveness are bigger than auctioning revenues – even if 100% redistributed
- Recycling
  - leads to additional administrative procedures and costs
- Diversity of practice in member states may not lead to leveling the playing field

## **Backup slides**

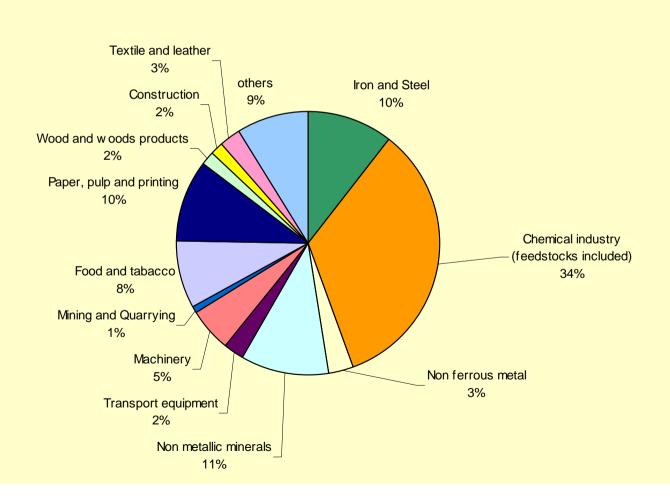


#### **Chemical industry energy profile**

Source: IEA

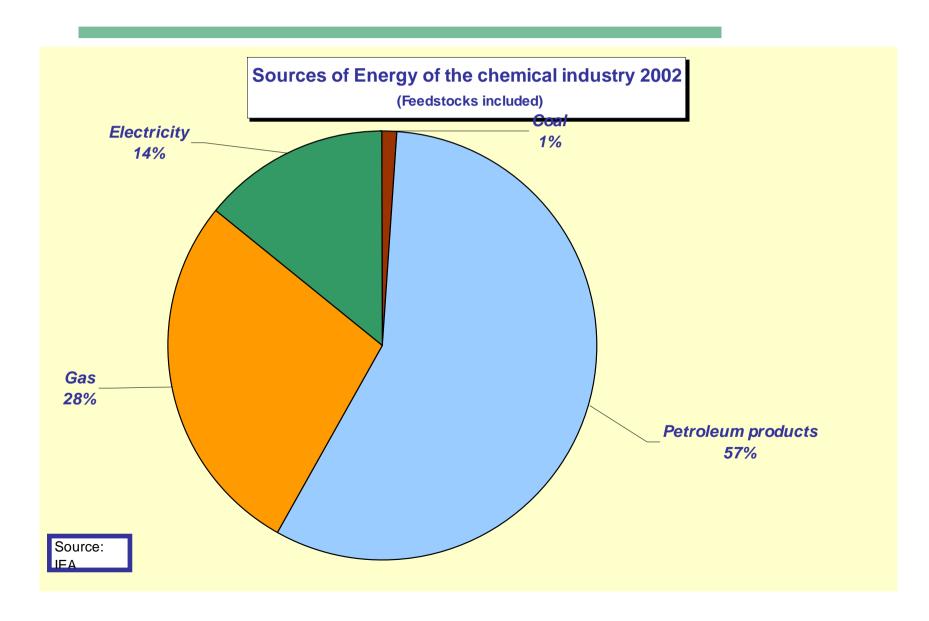






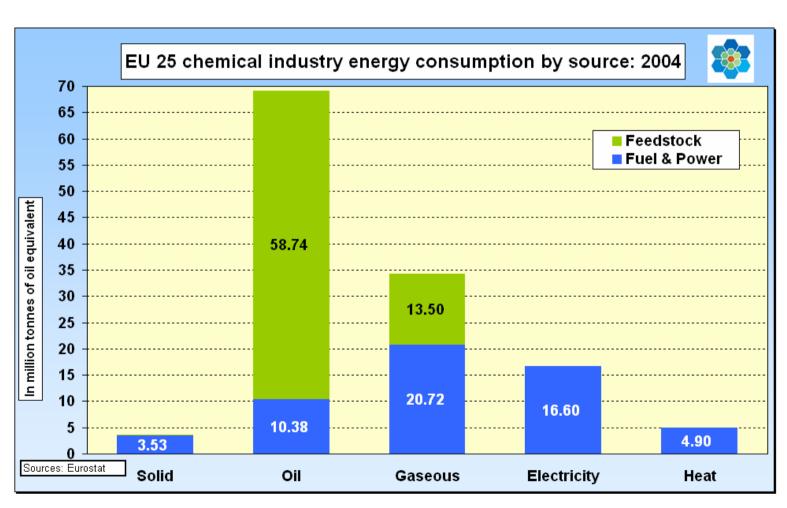
#### **Chemical industry Energy sources**





#### **Energy Consumption by source**







#### **Energy is a huge cost factor:**

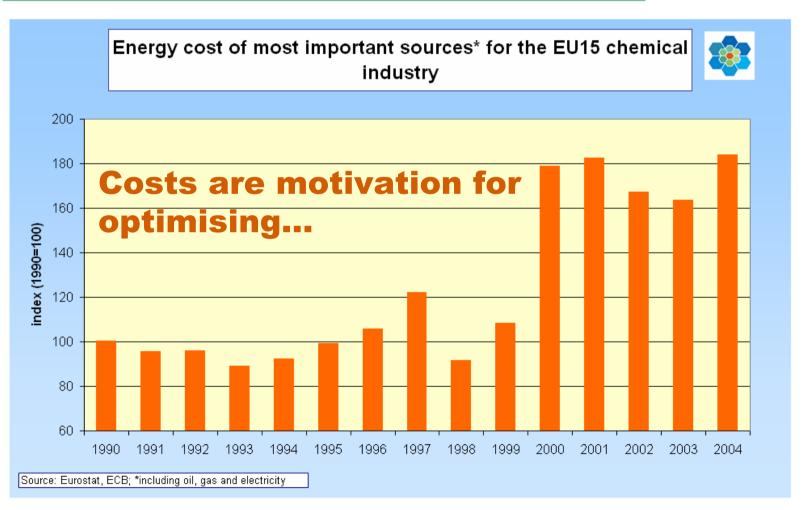
Consumption accounts for roughly 160Mtoe (3% of global and about 12% of EU energy demand\*1)

**Costs** account for 10 – 60% of production costs of most products

<sup>\*1</sup> Source: EC European Energy Outlook and Cefic

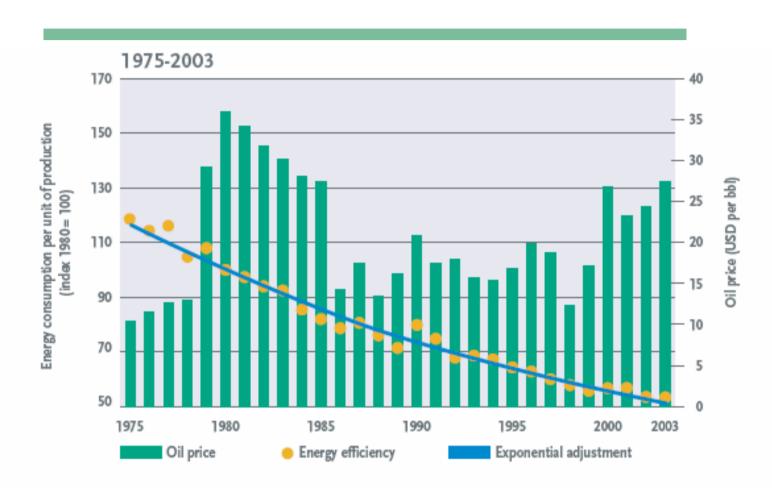
### Energy cost of most important sources for EU15 chemical industry











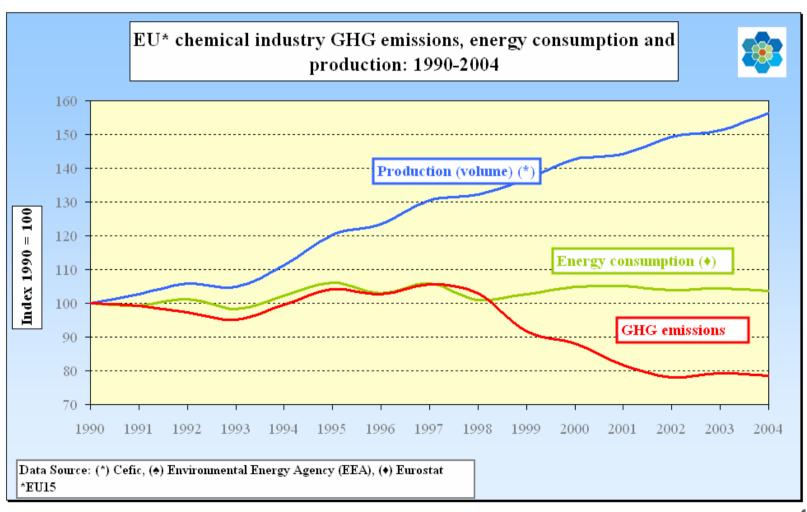
Sources: Cefic, IEA and UN

Notes: Energy efficiency is measured by energy input per unit of chemicals production

\* EU 15

#### **GHG** emissions, energy consumption, production trends







#### **GHG** emission trends

