
Consultation Response – The State of the Carbon Market in 2012.

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The State of the Carbon Market in 2012.

Options for Structural Reform of the EU Emissions Trading Scheme



Summary

ClientEarth recognises a sequence of priorities in approaching structural reforms to the Emissions Trading Scheme (ETS). Economic analyses demonstrate that if the backloading is not followed swiftly by the permanent cancellation of allowances, or other structural measures exerting the same upward pressure, the carbon price will crash even further than if the backloading never happened. For this reason, we call for the urgent cancellation of the set aside allowances as the first surgical step to restoring some confidence in the market. This step is essential to help fix the ETS on the path to 2020. Even after this is completed, it is clear that deeper structural reforms to the ETS will be required if it is ever to do enough to shift investment patterns and avoid lock in of high carbon infrastructure in line with the Roadmaps. These deeper reforms must be examined in the context of the post 2020 climate and energy package anticipated to be proposed this year. That joint process must also recognise the limitations and risks to relying on the ETS as the primary driver of power sector decarbonisation, and consider complimentary measures such as CO₂ emissions performance standards to manage the risk of decarbonisation agenda failing, or not occurring in ways that are optimised for cost or time.

We strongly support a move to 30% for the EU reduction target in line with climate science and preserving the possibility of averting the catastrophic levels of climate change. In addition we consider that, even with the increased scarcity implicit in the move to 30%, additional structural reform is also required to create a scheme that works in harmony with other EU climate policies, and that preserves a space for national complementary measures in the traded sector to have an impact on global emissions. This is in keeping with the general position for environmental measures adopted under the environmental legal basis of the Treaty of the Functioning of the European Union – which should not prevent more stringent protective measures at national level. Achieving these objectives will ultimately either require price support measures and/or cancellation mechanisms to ensure a match between real world scarcity and the allocation of allowances (the cap).

Modern economies are cyclical in nature. There will be future recessions. ClientEarth calls on the Commission to ensure the ETS is fit for purpose by proposing improved mechanisms for corrective action to maintain scarcity in the face of changing productivity and other real world scenarios. A guiding theme for the establishment of new mechanisms or institutional capacity should be the desirability of separating policy and regulatory functions for the management of the ETS. This could point to the need to establish new institutional capacity at arms length from the Commission, which may help improve the political acceptability of increased powers of intervention within the Scheme.

We do not support adding additional sectors until such a time as the ETS is proven to be functioning effectively and a full analysis and debate of the merits of alternative regulation for those sectors has been performed. However, we do call for equal treatment of all emissions within the sectors currently within the scope of the ETS Directive. For bioenergy (biomass, biofuels and bioliquids), this means that we call for an end to the zero rating of emissions from bioenergy. Combustion emissions from bioenergy should be fully counted, with a possibility of discounting in line with actual

greenhouse gas savings achieved. This reform would help distinguish among different types of bioenergy, promoting the best-performing ones over the others through the establishment of a price signal for bioenergy.

Finally, we call on the Commission to propose mandatory revenue recycling as a component of structural reform to the ETS. We consider that this has the potential to improve the political acceptability of more ambitious ETS caps, while increasing emissions reductions. Lessons could be learned from the US Regional Green House Gas Initiative (RGGI), where many States direct all or most revenue into home energy efficiency and refurbishment schemes. Many consider that recent decisions to significantly increase the ambition of the cap under the RGGI was influenced by the political attractiveness of more State money for these clean energy and refurbishment schemes that directly help consumers and protect them from rising energy bills.

Issues:

1. The need to ensure remedies that take effect urgently before 2020 - permanently cancel set aside allowances and push for move to 30% reductions

ClientEarth strongly supports the move to higher environmental ambition in the EU in line with latest climate science and increasing evidence that prospects of holding the world to no more than 2 degrees of warming are fast vanishing. Option A (move to 30%) has the advantage of having *potential* to address the short term crisis of the ETS and restore confidence and an investment signal of some sort by 2020. Such a decision to move to 30% would clearly require taking steps outlined in other options in the State of the Carbon Market report. In the current form of the ETS, the linear reduction factor extends beyond 2020 indefinitely on a path that is not in line with EU 2050 objectives or climate science. A move to 30% would necessitate revising the linear reduction factor on the path to 2020, while establishing an improved trajectory on the path to 2030 and 2050. However, particularly in the likely scenario that the EU's move to 30% is not decided upon swiftly or is not yet politically achievable, it will be essential to cancel the set aside allowances as soon as possible as a first step to remedying the short time price signal.

2. Adding additional sectors not yet advisable, but all emissions should be treated equally within the sectors covered

The ETS should not be extended to other sectors at present. Any extension should be subject to a strengthening of the Scheme, an examination of the peculiarities of candidate sectors, and an evaluation of alternative policy options.

Within the sectors covered by the ETS, all emissions should be treated equally. The State of the Carbon Market report explicitly mentions the possibility of extending the ETS to biomass.

ClientEarth welcomes this step and notes that the sectoral coverage of the ETS would not be extended as a result of changes in the treatment of biomass. Our proposal is to end the zero emission rating of biomass, biofuels and bioliquids. Emissions from the combustion of biomass, biofuels and bioliquids should be counted under the ETS, with discounting allowed if and to the extent that emission reductions are achieved.

If implemented, this proposal would:

- Contribute to higher emissions reductions (at the moment hard to quantify) by intervening on the demand for allowances, without the need to modify the activity coverage of the ETS.
- Improve the availability and quality of data in relation to emissions from biomass within the ETS.
- Help promote the best performing types of biomass by relating the level of public support with the level of emission reductions achieved, thereby making the price signal operational also for biomass.

ClientEarth believes it is not yet appropriate to consider bringing additional sectors into the Emissions Trading Scheme. Before extending the Scheme to new sectors, it must be reformed in a way that ensures the achievement of actual emission reductions. Moreover, the verifiability and stability of emission reductions in candidate sectors should be fully assessed prior to their inclusion. Additionally, the appropriateness of the ETS as a tool to achieve emission reductions in new sectors should be evaluated and questioned, as other policy instruments may fit such sectors better.

While ClientEarth does not support the inclusion of new sectors into the ETS, we maintain that, within the sectors covered by the Scheme, all emissions should be treated equally. At present, this is not the case for emissions from biomass. Currently, emissions from biofuels, bioliquids, and biomass are treated differently under ETS rules, as detailed below.

Emissions from certain types of biomass, namely biofuels used in aviation and bioliquids used for energy generation, are considered to be zero under the ETS on condition that sustainability criteria laid down in Directive 2009/28/EC are met. These criteria include a requirement that the production and use of biofuels and bioliquids should result in emissions at least 35% lower than fossil fuels. It is clear that the use of biofuels and bioliquids for energy does have positive emissions and there is no factual reason why those emissions should be rated as zero for ETS purposes. The reason behind the zero emission treatment is clearly not factual but political. As the Monitoring and Reporting Regulation acknowledges, such treatment is a support scheme.¹ Even so, it would be desirable to pitch the level of support in line with actual emissions reductions. Redesigned in this way, the support scheme would discriminate among biofuels and bioliquids and

¹ As Recital 2 of Commission Regulation (EU) No 601/2012 (so-called Monitoring and Reporting Regulation) states: 'preferential treatment with regard to allowance surrender obligations under the Union's greenhouse gas emission allowance trading scheme pursuant to Directive 2003/87/EC constitutes a "support scheme" within the meaning of Article 2(k) and consequently financial support within the meaning of Article 17(1)(c) of Directive 2009/28/EC'.

accord higher preference to the best performing ones. The resulting price signal would reward operators who use better biofuels and bioliquids while imposing a cost on less diligent competitors. Such an outcome is perfectly in line with the ETS method.

Biofuels and bioliquids which do *not* meet the sustainability criteria of Directive 2009/28/EC are at present treated in the same manner as fossil fuel. This choice finds its justification in the desirability of promoting only those biofuels which achieve at least a minimum greenhouse gas saving – thereby justifying the expenditure of public money – while at the same time safeguarding against the potentially negative impacts of biofuels and bioliquids production on other environmental values. ClientEarth believes that conditioning the granting of public support to meeting certain minimum objectives is sound policy. Biofuels and bioliquids not meeting the sustainability criteria should therefore continue to be treated as they are now.

The sustainability criteria laid down in Directive 2009/28/EC only apply to biofuels and bioliquids, but not to solid and gaseous biomass used for energy. For ETS purposes, the combustion of biomass for energy always receives a zero emission treatment, independent of any safeguard. While this situation will change if sustainability criteria will be introduced for solid and gaseous biomass, similar considerations as those made above would likely apply to biomass even after the approval of those criteria, should the current structure of the ETS support scheme remain unchanged.

ClientEarth therefore proposes the following reforms:

- Requiring that operators account for, and report to competent authorities, the combustion emissions from biomass, biofuels and bioliquids in an accurate manner;
- Discounting those emissions to the extent that combustion emissions are shown, or can reasonably be assumed, to be balanced by carbon sequestration occurring upstream;²
- Requiring operators to surrender allowances against the remaining level of emissions;

² Several options may be envisaged for the definition and quantification of such a discount. One option which would be in line with the approach of Directives 2009/28/EC and 98/70/EC, as amended, is to use as “discount” factors the savings reported for the purposes of those Directives for biofuels and bioliquids (and, perhaps in the future, biomass). Another possible option which would in part avoid the difficulties inherent in the accounting for the carbon balance of bioenergy would be to distinguish the different types of feedstocks according to the risks they pose in terms of emissions and wider environmental sustainability. Under these option, “safe” feedstocks would receive a zero emission treatment; “dangerous” feedstocks would be banned or treated as fossil fuels; “acceptable with safeguards” feedstocks would only be given a discounted or zero factor if certain conditions are met. The categorization of feedstock should rest on the basis of qualitative and quantitative analyses of impacts (including ILUC and the carbon debt), while avoiding that policies are stalled due to the difficulty in pinning a specific figure to a possible impact. Such an approach could be modeled on the Biomass Policy Regulation enacted by the Department of Energy Resources in Massachusetts (USA) (see [web page](#)). A further issue to consider is whether the discounting should take into account avoided emissions from fossil fuel displacement. In such case, difficulties would arise in the identification of the counterfactual. ClientEarth hopes that clarity on the possible definitions of the concept of carbon debt, and on the overall impacts of biomass for energy, will increase following the expected release of the literature review drafted by the Commission’s Joint Research Centre. ClientEarth and Stichting Birdlife Europe have recently challenged in court the Commission’s implied refusal to grant access to the document (Case T-56/13).

- Providing for information on both combustion emissions and the discounting applied to be transmitted to the Commission and be made available to the public.

ClientEarth believes that these reforms are legally feasible³ and that they should not be postponed on the unjustified assumption that emissions from biomass, biofuels and bioliquids are adequately dealt with under other European or international frameworks.⁴

It is difficult for ClientEarth to provide accurate information on the expected impact of our proposal on biomass. In order to assist the Commission in its evaluation, we can however provide at least the following comments:

Emissions reductions.

It is difficult to provide exact figures about the precise impact that the implementation of our proposal would have on emissions. We understand that this is primarily because data on the use of biomass and resulting emissions are at the moment not reported to the Commission, but rather remain within Member States, making it difficult to compute aggregate figures at EU level.

It is however relevant to note that, according to the National Renewable Energy Action Plans submitted by the Member States pursuant to Directive 2009/28/EC, biomass is projected to constitute 6.5% of total electricity consumption in the EU in 2020 (for context, offshore wind will cover 10.2% of EU consumption in 2020, hydro 10.5%, solar photovoltaic 2.35%, etc.)⁵ Nearly all projections to 2050 indicate a further increase of the share of biomass in total electricity consumption, in certain scenarios to 10% or more.⁶

It can be acknowledged that figures for biomass electricity do not exactly reflect the use of biomass in the ETS. This is both because not all biomass electricity necessarily comes from installations covered by the ETS and because figures for heat generation are not included. However, it appears realistic to envisage that most biomass electricity does in fact come from installations covered by the ETS (for example, from the co-firing of biomass in coal plants). Moreover, if figures for heat generation were included, data for the use of biomass would be even higher.

ClientEarth believes that the messages to be taken from these (admittedly imperfect) data sets are, first, that the use of biomass within the ETS is far from negligible and should therefore be regulated in a smarter way than under current rules and, second, that it is necessary to monitor more closely the use of biomass within the ETS and the

³ See ClientEarth, *Bringing the ETS in line with reality: Making biomass emissions count through the Monitoring and Reporting Regulation*, June 2011, at <http://www.clientearth.org/climate-and-forests/climate-forests-publications/biomass-emissions-1384>.

⁴ See ClientEarth, *Carbon impacts of bioenergy under European and international rules*, November 2012, at: <http://www.clientearth.org/reports/carbon-impacts-of-bioenergy.pdf>.

⁵ European Renewable Energy Council (EREC), *Mapping Renewable Energy Pathways towards 2020: EU Roadmap*, 2011, p. 15.

⁶ Smart Energy for Europe Platform (SEFEP), *Metastudy Analysis of 2050 Energy Scenarios: Policy Briefing*, 2012, p. 6.

resulting emissions in order to gather more accurate data.

The introduction of rules distinguishing among different types of biomass would appear appropriate on the basis of the fact that emissions from the combustion of biomass differ depending on what biomass is burnt:⁷

Biomass material	Preliminary EF [t CO₂ / TJ]	NCV [GJ/t]
Wood / Wood waste	112	15.6
Sulphite lyes (black liquor)	95.3	11.8
Other primary solid biomass	100	11.6
Charcoal	112	29.5
Biogasoline	70.8	27.0
Biodiesels ⁴¹	70.8	37.0
Other liquid biofuels	79.6	27.4
Landfill gas	54.6	50.4
Sludge gas	54.6	50.4
Other biogas	54.6	50.4
Municipal waste (biomass fraction) ⁴²	100	11.6

The levels at which combustion emissions may be considered not to happen or be recovered elsewhere will also differ between alternative types of biomass, further confirming that not all types of biomass should be treated alike and that the ETS public support scheme for biomass should reflect this reality.

Ability of the EU ETS to meet the EU long-term target of an 80-95% reduction in a cost-effective manner.

It may become slightly more difficult for the EU ETS to meet the envisaged targets. However, this would not be due primarily to a change in actual emissions, but to their more accurate measurement. At the same time, the introduction of a price signal able to differentiate among biomass, biofuels and bioliquids and promote the best performing ones should lead to higher actual emission reductions in a cost-effective manner.

Your activities or the activities of the business under your jurisdiction, including estimated changes in compliance and administrative cost.

Not applicable.

Employment and households.

⁷ European Commission, *Biomass issues in the EU ETS*, MRR Guidance document No. 3, Final Version of 17 October 2012, p. 23.

As the proposed reform would not change the sectoral coverage of the ETS, no impact on employment is expected. Energy prices may increase as a result of biomass, biofuels and bioliquids no longer being treated as zero emissions in certain cases. However, given the way these fuels are used (co-firing in power plants, process energy, aviation) the impact on prices may be rather small overall.

3. Move to 30% more achievable when full Effort Sharing potential considered

The State of the Carbon market notes that the move to 30% reductions by 2020 cannot be shouldered by the ETS alone and would require changes not only to the quantity of allowances in the EU ETS but would also affect the targets adopted under the EU Effort Sharing Decision. The Effort Sharing Decision covers approximately 50% of the EU's GHG emissions. ClientEarth considers the current EU wide Effort Sharing target of 10% as severely undermining the maximum feasible contribution such sectors can make in the years leading into 2020. ClientEarth urges the Commission to acknowledge the mitigation potential that sectors outside the non-ETS are capable of providing, and reassess the overall target taking into account policy scenarios that respond to recent Commission studies demonstrating cost effective 'low hanging fruit' in the non-traded sector. Part of the value of the Effort Sharing Decision, were it functioning properly, is to drive Member State *additional* action in cost effective ways, above the lowest common denominator that can be achieved by EU level climate policies in transport and other sectors. These include the scenario where methane ceilings are included in the reform of the National Emissions Ceiling Directive, and national or EU driven interventions to unlock the large amount of cheap potential from consumer behaviour change. With low demand for Effort Sharing allowances due in part to the economic crisis (and low ambition to begin with), combined with evidence showing the majority of Member States will not have to do much to meet their 2020 targets, the Effort Sharing Decision is an example of the EU 'sitting on its hands' unless reformed.

Recent studies solicited by the Commission demonstrate large amounts of low cost abatement potential by non-ETS sectors - additional to implemented, adopted and expected policies in 2009. An ECOfys study published last year showed that an additional 454Mt CO₂e in reductions can be achieved by 2020 at a marginal cost of 50 EUR/t CO₂e.⁸ Meanwhile, 'simultaneous behavioural change' referenced in a CEDelft study on consumer behaviour change⁹ last year showed a maximum of 600Mt CO₂e in reductions by 2020 (N.B. many abatement options in this category can be implemented at below 0 cost). The two figures together represent an increase of 27% on the current 10% overall target in the Effort Sharing Decision. Examples of cost effective measures Member States can introduce include remedying gas leakage from natural gas compression stations, incentivising biomethane capture for energy use, school interventions and awareness campaigns to

⁸ *Potentials and costs for mitigation of non-CO2 greenhouse gas emissions in the European Union unit 2030, Results, 2012, (DG Climate Action contract 07.030700/2009/545854/SER/C5)*

⁹ *Behavioural Climate Change Mitigation Options and Their Appropriate Inclusion in Quantitative Longer Term Policy Scenarios, 2012, (DG Climate Action contract 070307/2010/576075/SER/A4)*

shift consumer behaviour patterns and activity levels.

In parallel with an increase in an overall target, the Commission should consider an early revision of the Effort Sharing Decision so that it delivers incentives for domestic action and is capable of unlocking a higher range of the cheap available mitigation potential. ClientEarth suggests the Decision undergoes those critical changes that will facilitate Member States in attaining the range of abatement measures - from the low to high hanging fruit. This includes revising the current standards and criteria for compliance and importantly, filling the incentive void in the current Effort Sharing market. The flexibility provisions in the Effort Sharing Decision must engage Member States in sharing best practice, recycling revenue into sectoral activities and provide incentives that will drive real and additional emission reductions. The text of the Effort Sharing Decision should offer practical measures and mechanisms that can drive game changing sector based investment. In short - it is not just the ETS Directive that requires deep structural reform due in part to the financial crisis. The same script applies to the Effort Sharing Decision, with the market of allowances it created experiencing very low demand with resulting risk of little domestic action between now and 2020 in the non-traded sector.

4. Limit access to international credits

ClientEarth strongly supports EU climate policies that drive domestic action and is aware of many concerns regarding the use of international offsets within the ETS. However, limiting offsets must not be considered as a sufficient option in itself to address oversupply. The report itself makes clear that limiting offsets will not be enough to deal with oversupply. Additionally, while rules around offsets must be tightened, lessons must be learned in the execution of such bans or reforms. For example, lessons must be learned from the timelines of the recent banning of controversial HFC23 and N2O credits, which led to a floodgates of increased numbers of these credits entering the marketing prior to the date of effect of the ban. Additionally, although these industrial gas credits will no longer be permitted for compliance after this year's accounting period, research shows that there will be a new wave of low grade international offsets, registered prior to the cut-off. A rush of credits from unsustainably large scale hydro and wind farms (under controversial additionality assessments) into the market will diminish the price of carbon in the EU ETS. All of these evidence bases demonstrate the need to take tough action on offsets, (coupled with more agile legislative powers of intervention) in the next evolution of the ETS.

On a comprehensive approach, the Commission should evaluate the entire EU market with respect to further restrictions on international credit use in the EU Effort Sharing Decision. Consequently, any current and future measures on international credit use in the EU ETS must also be followed by action on Member States purchasing credits for compliance with the Effort Sharing Decision. A revision of the relevant provisions in the Effort Sharing Decision alongside EU ETS policy will send a consistent message to the international credit market. Currently, the quantitative and qualitative restrictions on international credit use in the Effort Sharing Decision are incongruent. The inconsistencies in the Effort Sharing Decision are explained in more detail in the following two paragraphs.

The ability to use international credits (CDM and JI credits) to comply with Member States' Effort Sharing targets is limited to 3% of each Member State's allowances in 2005 - meaning that 2/3 of the overall emission reductions required by 2020 by the Effort Sharing Decision can come from these international credits. The rules on quantitative restrictions should, at the very least, be brought in line with the EU ETS which restricts use over the entire compliance period, capped at 50%.

Currently, the Effort Sharing Decision does not explicitly exclude the use of HFC23 and N₂O adipic acid credits for compliance. To date, 11 Member States have declared that they will not use these types of credits towards their Effort Sharing targets. Other Member States have also made informal declarations. The Commission should consider this declaration as indicative of the currently poor standards on international credit use in the Effort Sharing Decision.

To conclude, ClientEarth calls on the Commission to evaluate the above quantitative and qualitative criteria on credits in its report under Article 6(3) and (4) of the Effort Sharing Decision. On the basis of early studies showing little abatement effort by Member States (see Ecofys study referenced above), the report should be brought forward to this year. The risk that Member States will take no domestic action is too high for the Commission to leave proposals to accelerate Member State action until the following year.

5. Cancellation mechanisms and revenue recycling

Oversupply is the primary failing in the ETS but it is not the only failing. A lack of synergy with other climate policies influencing both operation and investment in the traded sector must also be addressed in order to avoid 'policy cannibalism.' The 'cap and trap' function of an in-adjustable cap also strongly discourages Member State complementary measures to decarbonise the power sector. This played out in the parliamentary debates for the UK's introduction of CO₂ emissions performance standards for the power sector. One of the counter arguments was the accurate observation that under the current ETS, any emissions saved by this proposed UK regulation could or would be shifted to other sectors or Member States. The best way to deal with these failings is to consider reforms that would ensure that real world reductions in demand due to either the positive effect of energy efficiency policies or economic recession do not undermine ambitious reductions of GHG emissions.

The ETS has suffered multiple wounds due to overly inflexible legal architecture that fails to provide the Commission (or other centralised administration) the necessary powers to ensure its effective functioning. As one of many illustrations, article 10a) of the ETS Directive provides a mechanism to protect sectors deemed at significant risk of carbon leakage. The recitals of the ETS Directive make clear the objective to avoid unnecessary windfall profits flowing to installations as a result of free allowances granted under this article. However, the law only provides for the *removal* of sectors from the eligibility every 5 years, even if sectors no longer meet the criteria for more than 1 year. Worse still, the legislation does not require any revision of the baseline emissions upon which eligibility criteria are to be measured. Modern economies have cyclical lifespans. There will be future recessions and an ETS with a tighter cap that fails to provide the legal architecture to allow for corrective action to maintain scarcity in the face of a changing world will not

be fit for purpose. In addition, an important theme is the desirability of separating the policy and regulatory functions for the administration of the ETS. New institutional capacity could be established in ways that are less politicised than the European Commission to perform certain kinds of corrective action or administration within set out in legislation.

Allocation schedules should be designed so that allowances available for both auction and free allocation reflect more closely the actual emissions for a given year. If such an approach was applied at installation level, the end of an accounting period would signify a true-up period, whereby the installation takes account of those allowances that were over allocated to them for that year. While incentives must remain in order to ensure a functioning secondary market, this should be coupled with limits on the ability to 'bank' allowances. A stringent approach would place the onus on the operator to demonstrate that over supply was a direct result of energy saving technology would grant the installation the privilege to bank the surplus forward. This would strengthen incentives for mitigation. In the case of non-surrender of allowances, a limit could be placed on the amount of surplus that may be traded in any given year (or longer accounting period). Above this threshold of tradable surplus, surplus allowances should be returned to the established registry and cancelled immediately. Any 'rewarded' surplus allowances, could be used for subsequent years or sold on the market. The installation would undergo the same verification procedure every year whereby any surplus correlated to a decrease in production levels (as opposed to efficiency gains or mitigation efforts) must be returned to the reserve and cancelled.

Alternatively, cancellation mechanisms could be applied at national level by linkages with national auctioning platforms established by the Auctioning Regulation. This approach would require matching national emissions inventories (see Monitoring Reporting and Verification Regulation) against the aggregate 'bubble' of allowances released for auction (and or granted for free.) Drops in emissions (or aggregate productivity levels) above a certain threshold could trigger an automatic or discretionary cancellation mechanism.

Finally ClientEarth notes that lack of mandatory revenue recycling into GHG mitigation projects was the huge missed opportunity from the current version of the ETS. We also consider that this has led to missed political opportunities. For example, in the US Regional Greenhouse Gas Initiative (the voluntary cap and trade scheme employed in several US States), revenue recycling is a key component. For example, the State of Massachusetts directs all of its revenues into clean energy programmes (over \$178 million US since 2008) with a big focus on Energy Efficiency Investment programmes that help consumers with energy bills and living in more comfortable homes.¹⁰ Many consider that recent decisions to significantly increase the ambition of the cap under the RGGI was influenced by the political attractiveness of more State money for these clean energy and refurbishment schemes that directly help consumers and protect them from rising energy bills.

¹⁰ <http://www.mass.gov/eea/grants-and-tech-assistance/guidance-technical-assistance/agencies-and-divisions/doer/rggi-auction-proceeds.html>

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ClientEarth is a non-profit environmental law organisation based in London, Brussels and Warsaw. We are activist lawyers working at the interface of law, science and policy. Using the power of the law, we develop legal strategies and tools to address major environmental issues.

As legal experts working in the public interest, we act to strengthen the work of our partner organisations. Our work covers climate change and energy system transformation, protection of oceans, biodiversity and forests, and environmental justice.

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