



**International
Association
of Oil & Gas
Producers**

26 September 2012

*To: European Commission
Directorate-General Climate Action
Unit B1 – Implementation of ETS & Unit A4 - Strategy and Economic Assessment
Avenue de Beaulieu, 5
B-1049 Brussels
Belgium*

Dear Ms Yvon Slingenberg & Mr Stefaan Vergote,

Conc: OGP's response to the European Commission's consultation on review of the auction time profile for the EU ETS.

I am writing in connection with the Commission's Consultation on "Review of the auction time profile for the EU Emissions Trading System",

We appreciate the opportunity to present the view of the Oil and Gas Producers community (OGP) regarding the proposal to backload the EU ETS auction profile. I have attached our Position Paper on the subject; we trust you will find it helpful.

OGP is not supportive of the back-loading proposal; however we are keen to participate in constructive discussions as to the future regulatory development of the EU ETS. Any action taken must be the result of an open transparent process following a full assessment of the dimensions and longevity of the problem. It must be a considered response and avoid market interference.

We are supportive of solutions that take into account international developments and avoid exacerbating carbon leakage. We look forward to continuing to work collaboratively with the EU institutions in establishing a framework which contributes to this goal.

Please contact me, should you require any further information.

Marcus Wiemann
Director EU Affairs

Enc.: OGP Position on EU ETS "Rebalancing" Activity