Plugging the holes in the ETS



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Why set a cap?

- ETS best placed to deliver cost-effective domestic cuts
- The larger the quantity of CDM/JI credits in the ETS...
 - ... the greater the threat to its environmental integrity, if credits of dubious <u>quality</u> are allowed,
 - ... the greater the risk to its market stability,
 - ... the less domestic emission reductions it triggers.

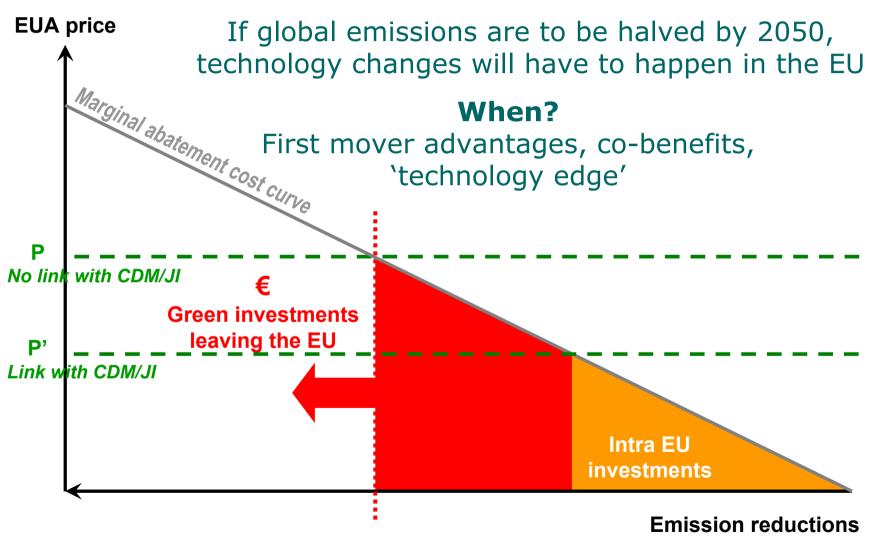


Cion predicting the future in 2003

- `Linking ... will affect the emission trajectories of installations using these credits...
- ...the environmental co-benefits from further greenhouse gas emission reductions ... are foregone...
 - ... it would discourage initiatives for the reduction of emissions within the EU...
- ... it could also have a perverse effect by retarding technological development of the most promising emission reduction technologies within the EU
 - while these are necessary for fighting against climate change over the medium to long-term.'

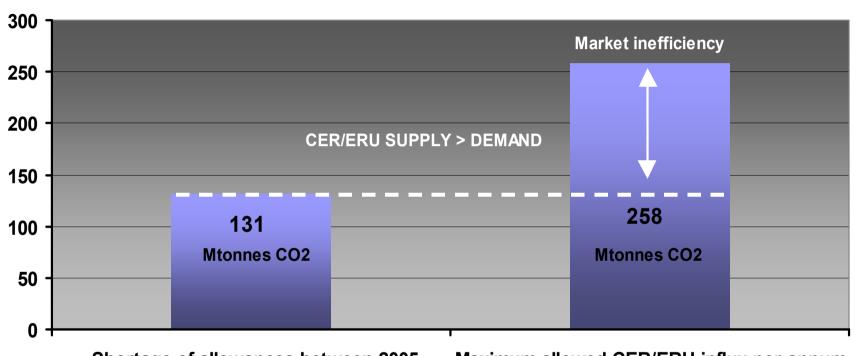
Commission's original Linking Directive Explanatory Memorandum, 2003

Bigger link with CDM/JI: ⇒ less investments in EU ⇒ less innovation in green-technology





Lessons Learnt



Shortage of allowances between 2005 (comparable) verified emissions and 2008 allocation

Maximum allowed CER/ERU influx per annum



Lessons Learnt

Looking at NAPs for 2008-2012:

Compliance will be overwhemingly achieved through CERs and ERUs

Between **87 - 197%** of reduction effort will NOT be domestic...

⇒ A different type of supplementarity:

'In the ETS, domestic action

is supplemental to use of external credits'



Which cap?

Current situation can not continue after 2012

- Principles for determining cap:
 - Environmental effectiveness
 - Price impacts versus marginal green investment costs
- l How much (of allocation?)
- In principle, 0%
- Commission's initial 6%?
- What type of cap ?
 - EU-wide limit (AND annual installation-level cap)

and QUALITATIVE SAFEGUARDS!!!!



Thank You

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