

Dear Sir / Madam,

The Federation of Enterprises in Belgium (FEB, Transparency Register number: 47676761061-93) hereby wishes to react on the consultation on review of the auction time profile for the EU Emissions Trading System.

FEB supports the central role played by the EU Emissions Trading Scheme as a market instrument in the EU climate policy. Therefore we have called on EU policymakers to start an open and inclusive debate, involving all stakeholders, on the necessary level of ambition for the ETS by 2030. We are therefore thankful for this consultation.

To incentivise the necessary investments, there is an urgent need for a clear and stable framework with regard to the long term objectives we want to achieve by 2050. Furthermore it is equally important to start the debate about the post 2020 regulatory framework and the intermediary greenhouse gas reduction targets. In contrast to the proposed one off interventions and short-term measures, business should be allowed to plan the typically big and long-term investments this requires.

Secondly, we would like to express our deep concern about the fact nor an impact assessment, nor a competitiveness proofing was carried out in preparation of these proposals. I must be clear that measures of great magnitude like the ones in question cannot be swiftly implemented without any dialogue with stakeholders. Therefore, any proposed measure must be accompanied by a bottom-up impact assessment which carries out a thorough competitiveness proofing for the sectors most likely to be affected by these measures. For that reason we encourage you to make sure that the necessary analysis is carried out, and that a transparent process is set up. Needless to say, we are aiming at providing constructive input concerning this matter.

For these reasons, in the context of efforts at EU level to support growth and economic recovery, and because given the current economic situation it would be detrimental to increase operational costs for businesses as well as to increase uncertainty, we would like to ask you to take into consideration the views and opinions of European businesses.

Best regards,

Pieter-Jan Van Steenkiste



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17.09.2012 // VBO **FORUM FEB**

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