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Directorate-General Climate Action
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| Date: 28-02-2013 | Your ref.: | Our ref.: ETS-2013-01 | Direct tel.: +31(0)251 262207 | E-Mail: h.jansen@cvg.nl |
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Ref.: Answer to the consultation on structural options to strengthen the EU Emissions Trading System.

Dear Sir / Madam,

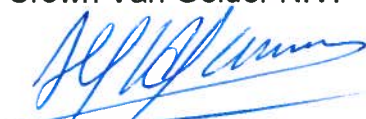
Because there is no formal questionnaire in the consultation request Crown van Gelder N.V. (CVG) hereby wishes to react by means of this letter on the structural options to strengthen the EU Emission Trading System.

CVG supports the central role played by the EU Emission Trading System as a market instrument in the EU climate policy but the ETS should be more effective and not only focused on price management but on structural features towards a GHG reduction target for 2020 and beyond in the industry sectors.

On a high level we feel that:

- The free allocation of emission rights should remain and based on a benchmark method.
- Auction revenues should be returned to and used in the high energy intensive industry as innovation support.
- Create long term investment security and stability by means of legislation. Because the low carbon technologies are financially intensive.
- Set clear targets also after 2020 coupled to an international level playing field.
- Prevent local solutions to avoid the creation of strong upsets in an EU cross border energy market.
- Apply uncoupling of the energy production for own use so that the emission connected to that are free or given by means of benchmark. (Segregation between the energy sector and industry).

Yours sincerely,
Crown Van Gelder N.V.



Herman J.A. Jansen
Manager Technical Department

cc: M. Dronkers, CEO