

Stakeholders Consultation on structural options to strengthen the EU Emissions Trading System

CIROM - the Romanian Association of the Owners from the cement industry and other mineral products for constructions - appreciates the opportunity to comment on the structural options and views reflected in the report "The State of European Carbon market in 2012" (the Report).

CIROM waives the confidentiality and legal privilege of this document and agrees that its comments can be disclosed.

CIROM understands the need to undertake structural changes to the ETS in order to strengthen it and believes that the 2012 carbon market report is only a first step towards a comprehensive assessment.

CIROM is strongly opposed to any proposal that would introduce changes in the third trading period and that would result in multiple reforms in the space of a few years.

None of the option presented in the report are real structural measures. All proposed options concentrate on the short term carbon price, thus addressing the consequence and not the root cause of the problem.

For post 2020, CIROM calls for an integrated approach which takes into account climate change, energy, industrial policy and resource efficiency. The fundamentals should be addressed in such a way that:

1. Predictability is ensured;
2. A level playing field from both a geographical and a sectoral point of view is ensured;
3. Long-term growth, jobs and investments in Europe are stimulated.

Other avenues than the one currently addressed in the report should be explored. This includes allowances supply management mechanisms as well as mechanisms aiming at creating a level playing field with importers.

CIROM fully supports and endorses the Cembureau position attached at this email and strongly recommends that the European Commission, the European Parliament and Council engage in a proper consultation in relation to a predictable, consistent and simple legal framework which provides industry with the legal certainty required. Long term investment planning in Europe requires legislation that ensures both legal certainty and predictability.

We are looking forward for further involvement in developing such a legal framework.

Best Regards,

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Executive Director