

Why do policy makers struggle with getting the carbon costs internalized

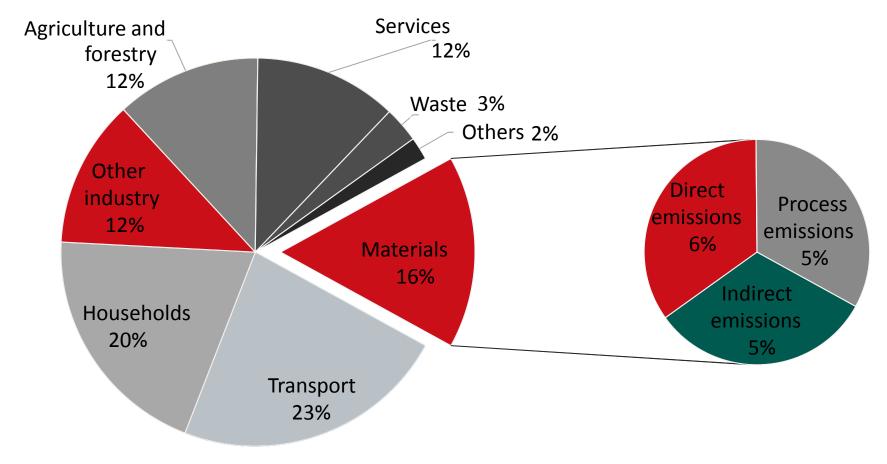
- Distributional effect
 - In most instances small and can be directly compensated
 - -> in transport sector effects most prominent but gasoline taxes high
- Complexity of instruments and analysis
 - No differnt from other taxes, and better data available for analysis
 - -> overall increase number of charges and provisions
- Concernes voiced about competitiveness / carbon leakage
 - Motivated excemptions from energy taxes&charges, free EU ETS allowances
 - Motivated reductions in stringency / charge level of EU ETS, RE support ...
 - -> Topic of particular relevance for basic material production



Focus is on Basic materials = 16% of EU greenhouse gas emissions

Share of EU greenhouse gas emissions

[power sector emissions are attributed to each sector as indirect emissions reflecting electricity use]



Carbon price not "active" for most mitigation opportunities

Mitigation option

Role that carbon pricing can play:

ETS with free allocation

Fuel shifting and production efficiency

Savings with more efficient production

Carbon price effective with benchmarks (level too low ...)

Carbon focused process innovation

Extra Innovation funding

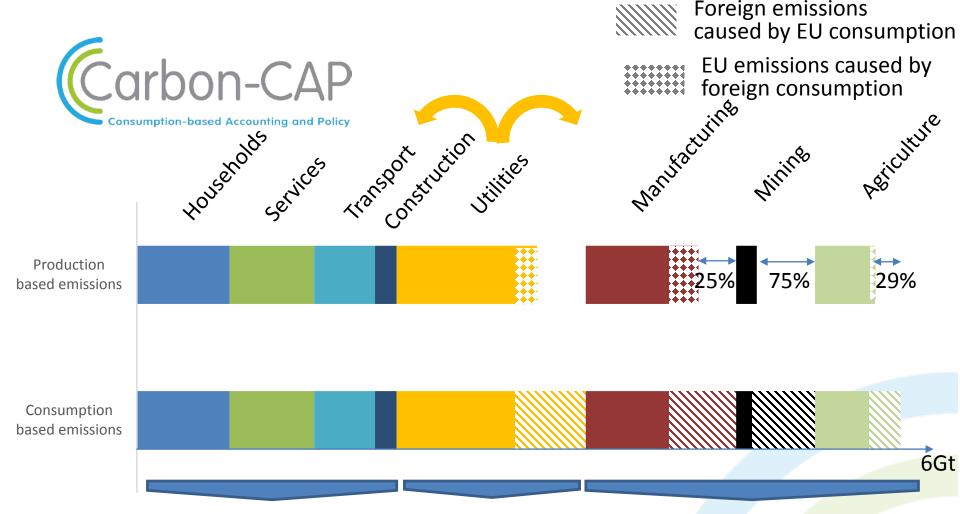
Covering incremental costs

Material efficiency and substitution

Savings with efficient / lower-carbon material use

Carbon price muted:

- International Trade
- Dynamic allocation: global steel demand 55% of capacity
- Persistent allocation at high benchmark level



- Success of measures tailored to consumption decisions (efficiency standards, financial support, advice).
- Higher feasibility and fiscal preference for energy taxes over production based policies (e.g. oil cartel).
- EU ETS for fuel shift
 - RE policy
- impact on consumption choices.
 Consumption based policy emerging (labeling, Eco-Design),

Largely production based policies

like EU ETS, so far with limited

emerging (labeling, Eco-Design)
but not price based

How can we resolve?

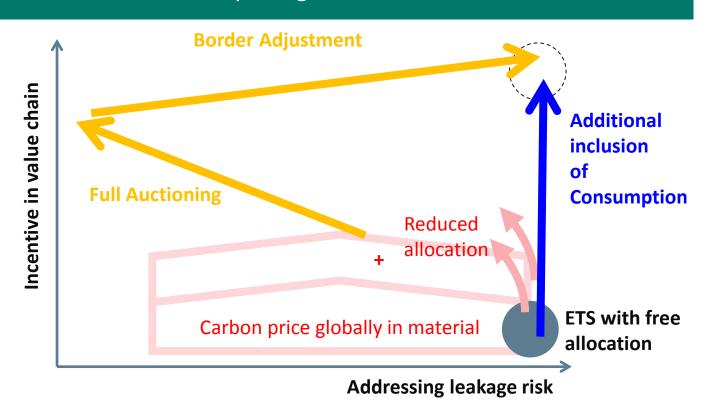
Three options to extend carbon pricing to value chain

Incentives for

Climate friendly production with incremental cost

Efficient material use and substitution

Production efficiency and fuel shifting



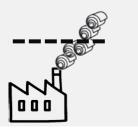
- Three options for leakage protection in post Paris world of differentiated carbon prices:
- 0. Iterative increase of carbon price in traded materials with reduction of free allocation
- 1. Full auctioning for incentives backed by Border Adjustment for leakage protection
- 2. Free allocation for leakage protection & Inclusion of Consumption for incentives



Option 1: Border related approaches - politically or economically difficult



Carbon leakage protection Surrender allowance to cover CO2 emissions



Reimburse export

Charge on import

benchmark * weight *EU ETS price

also material in product

- Incentive for climate friendly material production
- Consumers contribute to carbon cost: Essential for viability of technologies with incremental cost

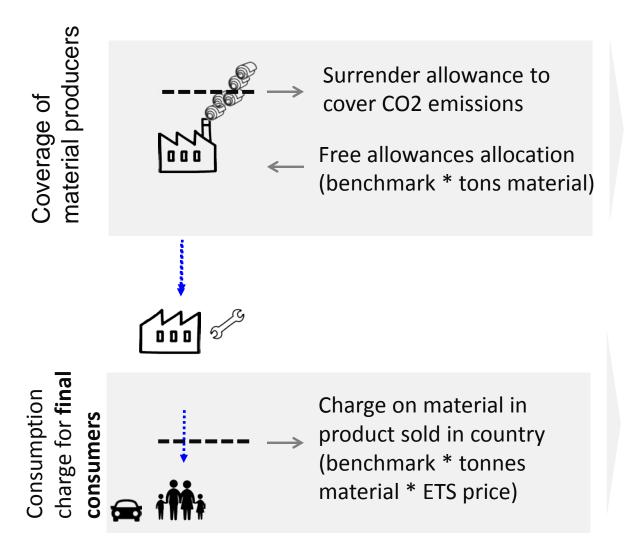
Incentives for efficient material use and substitution: Saves European consumers the consumption charge



For WTO compatibility (Art 3 GATT), use best available technology benchmark in combination with full auctioning to avoid discrimination



Option 2: Inclusion of Consumption of basic materials in carbon pricing



Incentive for climate friendly material production and carbon leakage protection

Consumers contribute to carbon cost: Basis for viability of technologies with incremental cost

Incentives for efficient material use and substitution: Saves European consumers the consumption charge

Finding from technical reports on Inclusion of Consumption (IoC)

What to learn from international experience?

- Engaging consumers can unlock unexpected potentials (Japan)
- Inclusion of power consumption established in Korea and China

What is the legal basis?

- IoC can be part of EU ETS Directive and deliver environmental objectives
- IoC is consumption based and thus on good side of WTO law

What administrative approach can limit public and private costs?

- Small fraud risk because no pay-out and value only fraction of product price
- Simplified procedures possible, e.g. aggregate quarterly reporting

What can we learn from quantifying the impact across product categories?

- Focus on basic materials: steel, clinker, aluminum (plastics, pulp&paper)
- De-minimis rules possible



Conclusions

Policy packages essential for low-carbon transformation

- Can effectively address satisficing, optimizing and strategizing behavior.
- Carbon pricing particularly important in industry and power.

Carbon pricing approach in industry has been focused upstream

- Trade of materials creates leakage concerns, free allocation -> muted price.
- Carbon leakage concerns have undermined effective carbon pricing.

We need a new strategy for making ETS effective for industry

- Converging carbon prices + phase out free allocation: Slow +Uncertain
- Shift from auction to border adjustment: **Difficult politics/economics**
- Inclusion of consumption in ETS: Suitable for basic materials



Conclusion: Inclusion of Consumption of Carbon Intensive Materials in ETS

IoC restores carbon price signal to be effective for all mitigation opportunities

-> More mitigation opportunities can be realized at lower cost.

Effective carbon price provides clarity for strategic choices of companies

-> Makes ETS more effective in supporting innovation and investment.

IoC builds on international experience and avoids lock-in with national systems

- -> Pool data for better benchmarks and thus stronger incentives.
- -> Once carbon prices converge, free allocation with IoC can be easily abandoned.

Producers of materials covered by IoC receive free allocation at full benchmark

- -> Long-term clarity on carbon leakage protection good for investments.
- -> Addresses political concerns about leakage allowing for stringent carbon prices.

