



Article 29a EU ETS Directive

EU Measures in the event of excessive price fluctuations

February 25, 2022

ERCST

Roundtable on
Climate Change and
Sustainable Transition

ERCST Views

1. Governance

- Rapid reaction.

2. Transparency – menu of aspects

- Higher clarity in the level of trigger price
- Table explaining the triggering values (UK example)
- Date for decision on action
- Method of communication – e.g.: announcement after trading hours.

3. Timeline

- Clear and precise timeline
- E.g.: 10 days to produce a report (UK)

4. Trigger

- 6 months is too long
- 3 times is too high -> 2 times to be triggered instead

5. Action

- Price-based
 - Bring EUAs to market at a price 2x average price over the last 2 years
 - Use EUAs from MSR
 - +10% price increase after MSR is depleted.
 - I.e.: California offering covered entities additional metric tons if needed for compliance.
- Volumes-based
 - Auction from MSR until clears at 2x 2-year average
 - If MSR empty borrow from future allowances.

Thank you

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