



13 December 2011

Dear Members and Substitutes of the ENVI Committee,

The ENVI Committee will soon vote on the Liese Opinion on the European Commission's proposal for the Energy Efficiency Directive.

BUSINESSEUROPE and its 41 member federations have welcomed the publication of the Commission's proposal. Energy efficiency has unfortunately received too little attention at European level in recent years. However, I would like to draw your attention to some specific amendments which are strongly opposed by BUSINESSEUROPE.

The amendments listed below aim to modify the regulatory framework for phase III of the EU Emission Trading Scheme (ETS) in order to set-aside allowances.

Amendment 324 (Bas Eickhout, Linda McAvan, Pavel Poc, Dan Jørgensen, Sirpa Pietikäinen, Corinne Lepage, Sabine Wils)

Amendment 343 (Chris Davies, Vladko Todorov Panayotov, Gerben-Jan Gerbrandy)

Amendment 353 (Kriton Arsenis)

BUSINESSEUROPE believes that, while a higher carbon price could provide a stronger incentive to reduce emissions, regulators should refrain from undue intervention in the market mechanisms to steer the allowances' price in one direction or another. The EU ETS is primarily an instrument designed to achieve a pre-determined emission reduction objective in a cost-effective and economically efficient manner.

European business supports the climate policy framework and the targets set by the "Climate and Energy Package" in 2008 and is against any attempt to alter them by setting aside allowances as proposed in the above-mentioned amendments.

Moreover it is legally and politically highly questionable to realise such a change in the ETS legislation through the Energy Efficiency Directive.

This would reduce predictability for industry and the market's faith in the EU ETS.

I thank you in advance for the consideration you may give to our concerns.

Yours sincerely,

Philippe de Buck