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Operational procedures for dealing with carbon leakage

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Enhancing the carbon market



The challenge for the carbon market

- The 8 year time span carbon of Phase 3 is price unprecedented
 - What does the market know about abatement costs?
 - Market price may be very volatile and vulnerable
- Almost all emerging ETS include some kind of mechanism to stabilize the carbon price
 - RGGI (Regional Greenhouse Gas Initiative)



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Strategic mandate for a carbon authority

- Almost all emerging ETS include some kind of mechanism to stabilize the carbon price
 - **RGGI (Regional Greenhouse Gas Initiative)**
- Timing of supply of allowances for auctioning
 - > Liquidity management -
 - timing of auctioning, new entries reserve, purchases on market
 - linking
- Controlling the liquidity of the carbon market
 - **7** Carbon Authority intervenes on market
- Carbon authority
 - ↗ Could be an EU agency
- Recent non-paper by the Commission
 - Emphasizes that fundamentals and the long time horizon will stabilize the carbon price



The Commission proposal on carbon leakage



The Commission proposal

Three sectors

- **Power sector**
 - 0 / 0 % free allowances
- **Normal sector**
 - 80 / 0 % free allowances
- **7 Exposed sector**
 - up to 100 % free allowances

Procedure for exposed sector

- Find criteria for qualifying as exposed sector
- Decide upon the allocation of free allowances





Commission non-papers on carbon leakage

Two non-papers

Indicator 1

- Industry's additional costs relative to product prices, related to CO2 emissions
 - Direct costs
 - Indirect costs from electricity
- Indicator 2
 - **Openness to international trade**
 - Exposure to international competition



Proposals from Germany and France



The emerging consensus

- The risk of carbon leakage should be dealt with by issuing free allowances
- The risk of carbon leakage will be determined by two indicators
 - (1) Carbon cost intensity(2) Trade intensity



The modified proposals by DEU and FRA

DEU proposal

- kg CO2 / Euro Value Added
- **7** Contains a list of about 15 sectors

FRA proposal

- ↗ No suggestions as to sectors affected
- Cost indicator needs to reflect carbon price
- How to determine thresholds?



Operational procedures based on competitive position of sectors and installations



Carbon Leakage Impact on production



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Carbon Leakage Impact on investments

- C-Cost intensity
 - Relocation of new installations
- Relocation competition for new installations
 - C-Costs in gross value added





Deciding about the exposed sector

- Stage 1 Whenever at least one indicator for a sector (subsector or installation) exceeds a threshold, this constitutes excessive exposition to carbon leakage.
- Stage 2
 These indicators may serve for political decisions about the amount of free allocations.



- All sectors are exposed to carbon leakage for different reasons and to different degrees
- Early political decision about carbon leakage is possible based on a set of operational criteria



An extended proposal that emphasizes a unified procedure for all sectors



Elements of an operational procedure (1)

- All sectors start with the same share of free allowances
 - **∂** e.g. 80%
- If sectors / sub-sectors see no risk of CL this share is reduced by a fixed rule
 - **a** e.g. 0% in 2020



Elements of an operational procedure (2)

- If sectors / sub-sectors see a risk of CL they may opt-in for CL Monitoring
- The CL Monitoring is done annually and determines
 - The amount of risk of CL by indicators for carbon cost intensity and trade intensity
 - 7 The amount of free allowances allocated to sectors / sub-sectors for the next year
 - These dynamic adjustments reflect changes in the carbon price and in the trade flows
- The information provided for CL Monitoring also serves for the distribution of free allowanced to installations by a EU benchmarking procedure



Advantages of this procedure

High flexibility with respect to

- 7 The sub-sectors involved
- **7** Unexpected changes in the carbon price and trade flows
- The Package needs a consensus only for the procedure of CL Monitoring but no numbers for sectors / sub-sectors.
 - **7** This enables a decision of the Package by December

