

## **ontwerpbeslissing (B)2364 / projet de décision (B)2364**

**Openbare raadpleging over ontwerpbeslissing (B)2364 tot goedkeuring van de studie betreffende de marktgebaseerde bepaling van de CO<sub>2</sub>-emissiefactor voor België**

***Consultation publique relative au projet de décision (B)2364 d'approbation de l'étude relative à la détermination du facteur d'émission CO<sub>2</sub> pour la Belgique fondé sur le marché***

### Reaction of Febeliec

Febeliec thanks the CREG for the opportunity to respond to the consultation on this draft decision. Febeliec fully supports the draft decision and particularly the position of the CREG:

- to recognize the need to compensate companies from selected sectors for the cost of indirect emissions in the framework of the ETS mechanism in order to protect their global competitiveness;
- to approve the methodology used by CompassLexecon for calculating a market-based emission factor for Belgium;
- to apply the same national market-based emission factor for Belgium as the one for France.

Febeliec understands the reservation made by the CREG in this draft decision concerning the use of the same emission factor for the whole of the trading period 2022-2030. It should therefore be possible to review the national market-based emission factor if the protection against carbon leakage for industrial consumers is not appropriate given evolutions in the national and regional fuel mix, however without undermining legal certainty for the concerned companies.

Kind regards,

***Peter Claes\****

**on behalf of Febeliec vzw/asbl**

***Federation of Belgian Industrial Energy Consumers***

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***Febeliec represents the industrial consumers of electricity and natural gas in Belgium.***

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*Febeliec represents industrial energy consumers in Belgium. It strives for competitive prices for electricity and natural gas for industrial activities in Belgium, and for an increased security of energy supply. Febeliec has as members 5 business associations (Chemistry and life sciences, Glass, pulp & paper and cardboard, Mining, Textiles and wood processing, Brick) and 39 companies (Air Liquide, Air Products, Aperam, ArcelorMittal, Arlanxeo Belgium, Aurubis Belgium, BASF Antwerpen, Bayer Agriculture, Bekaert, Borealis, Brussels Airport Company, Covestro, Dow Belgium, Evonik Antwerpen, Glaxosmithkline Biologicals, Google, Ineos, Infrabel, Inovyn Belgium, Kaneka Belgium, Kronos, Lanxess, Nippon Gases Belgium, Nippon Shokubai Europe, NLMK Belgium, Nyrstar Belgium, Oleon, Pfizer, Proxiums, Recticel, Sol, Tessenderlo Group, Thy-Marcinelle, Total Petrochemicals & Refining, UCB Pharma, Umicore, Unilin, Vynova and Yara). Together they represent over 80% of industrial electricity and natural gas consumption in Belgium and some 230.000 industrial jobs.*