



Association des Amidonneries
de Céréales de l'Union Européenne

AAC POSITION ON THE INTERPRETATION AND IMPLEMENTATION OF DIRECTIVE 2003/87/EC ESTABLISHING A SCHEME FOR GREENHOUSE GAS EMISSION ALLOWANCE TRADING WITHIN THE EU

The AAC (European cereal starch association) is very concerned by the possible different interpretations and implementations of Directive 2003/87/EC establishing a scheme for greenhouse gas emission allowance trading within the Community in all the 25 European Member States.

The AAC supports the European food and drink industry's (CIAA) request to be excluded from the scope of the Directive because as a whole, the food and drink industry is only responsible for a small part of the CO₂ emissions and because it is not mentioned in the list of categories of activities (Annex I) covered by the Directive. The reference to combustion installations with a rated thermal input exceeding 20 MW only relates to energy activities.

However, we understand that some Member States are not in favour of excluding the food and drink sector from the scope of this Directive. In this framework, it is of the utmost importance that when Member States draft their National Allocation Plan (NAP), and the EU Commission assesses them, they strictly respect the criteria of non-discrimination between companies or sectors and therefore adopt the NAPs taking into account a coherent and harmonised approach throughout the new enlarged EU.

In order to respect this essential criterion to avoid distortion of competition between companies and sectors, the AAC also believes that the Directive should be implemented at the same time in all EU countries, including the new Member States.

In this context, and still in order to avoid distortion of competition, the AAC favours the use of the benchmarking approach (i.e. specific energy consumption per ton of product x volume x annual growth factor) to distribute the allowances for emission of greenhouse gases. In fact, the EU cereal starch industry has a continuous positive growth rate that can only be taken into account in the benchmarking approach and that should not be hampered by the establishment of emissions quota on a fixed historical basis as proposed by the historical approach. This second approach would also require that the reference years are the same in all the EU countries.

In addition, the benchmarking approach also takes into consideration the progress already made regarding energy use and the possible improvements in this field.

As an important user of the Combined Heat and Power (CHP) system, the AAC believes that after having promoted such a technique (Directive 2004/8/EC), its use should not be penalised and should even be harmonised throughout the EU also via this new Directive.

April 2004