

Ministry of Infrastructure and the Environment

# Level playing field effects of EU-ETS

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#### ETS = cap-and-trade system

- Started in 2005
- Parties involved: different industries, power supply
- Emissions need to be covered by emission allowances
- Total number of emission allowances is limited (cap)
- On 1 January 2012 aviation was brought within the EU-ETS
- The total cap has therefore been increased with approx. 10%







- Not a cap for each individual company, but a general cap
  - → Growth of individual participants is still possible as long as emissions of *all* participants combined are lower than the cap
- Flexibility for participants: purchasing/selling allowances or realising reductions
- CO<sub>2</sub> reductions are achieved at the lowest cost
- Environmental effect is guaranteed (=cap)

# Geographical scope





Flight(segment) within ETS

---> Flight(segment) outside ETS

### Aviation 'cap'



- All flights from/to/within EU-27 + Iceland, Norway and Liechtenstein
- Historic emissions = average yearly emissions in period 2004-2006
- 'Cap' 2012 = 97% of historic emissions
  - 85% allocated for free based on benchmark
  - 15% through auctioning
- 'Cap' 2013 = 95% of historic emissions
  - 82% free
  - 15% auctioning
  - 3% special reserve



Excluded from EU-ETS (a.o.):

- Government, military and police flights
- Search and rescue flights
- Training flights, scientific research flights
- Commercial aircraft operators with:
  - less than 243 flights per 4 months

OR

- Emissions of CO<sub>2</sub> less than 10,000 tonnes/year
- Incoming flights from countries with 'equivalent measures'

# Allowance shortage





# Allocation method



• Free allocation per airline:

RTK 2010 <sub>airline A</sub> \* benchmark

• Benchmark (2012):

=  $\Sigma$  RTK's 2010 /  $\Sigma$  free allowances 2012 = 0.6796 allowances per 1,000 RTK

 Number of free allowances per airline depends on efficiency compared to average efficiency (benchmark)!

### Results benchmark





- allocated free allowances in 2012 (Mtonne)
  - percentage covered by free allowances in 2012

# Allowance shortage





# Buying allowances



- Emissions forecast:
  - RTK's grow 3.5% per year
  - Autonomous efficiency improvement 1% per year
  - = CO<sub>2</sub> emissions grow 2.5% per year
- 2012: on average 25% purchasing of allowances
- 2020: on average 42% purchasing of allowances

# Costs for airlines



- In 2012 airlines need to buy 60 million allowances
- In 2020 this will be 120 million.
- At a price of 10 euro per allowance, costs will be:
  - 2012: 0.6 billion euro
  - 2020: 1.2 billion euro
- Value of freely allocated allowances is ca. 1.8 billion euro each year
- Passing on costs to passengers is strategic choice:
  - price sensitivity, degree of competition, marketsegments etc.

### Passing on costs





# Effects on ticket prices



	Distance (return)	€10/ton Purchase costs (scen. 2)	€10/ton Also value free allowances (scen. 3)
Amsterdam – Londen	740 km	€ 0.2	€ 0.8
Amsterdam – Barcelona	2,480 km	€ 0.6	€ 2.4
Amsterdam – New York	11,730 km	€ 2.7	€ 10.8
Amsterdam – Jakarta	22,730 km	€ 5.2	€ 20.8

At a price of 10 euro per allowance:

Scenario	EU airlines	Non-EU airlines	KLM
Purchase costs (scen. 2)	-0.2%	0%	-0.6%
Also value of free allowances (scen. 3)	-0.9%	0.2%	-2.2%

- Effects in relation to expected market growth curve!
- Effects proportional to allowance price
- Outcome is not level...

# Effects on pax. demand





# Effects on pax. demand 🚲



Airline	Passengers in 2011 (x mln.)	Relative effect	Change in number of pax (x 1.000)
KLM	25.1	-0.6%	-150
Air France	50.7	-0.2%	-100
Lufthansa	65.5	-0.3%	-200
British Airways	37.1	-0.7%	-260
Emirates*	8.2	0.7%	60
Swiss Airlines*	10.1	0.5%	50
Turkish Airlines*	11.1	0.1%	10

\*) Only that part of the market served by that airline, that is affected by ETS (not necessarily within ETS!).

# Environmental effects





- 29% reduction of CO<sub>2</sub> in relation to expected emissions in 2020.
- Little increase of CO<sub>2</sub> in markets outside ETS: 0.5 Mton (scen. 2) / 1.1 Mton (scen. 3) at 10 euro per allowance.

# **Risk of retaliation**



- Non-compliance (China, India, US(?), ... )
- Economic measures (China blocking Airbus orders)
- Increasing overflight fees (Russia) or airport tariffs
- Traffic rights
- Could be applied `generally', or country-specific
- Not imaginary; has happened in the past
  - Reduced frequency of KLM-flights to St. Petersburg

• Retaliation could further distort outcome in terms of LPF





Conclusion:

- Rule based:
  - Flights of some commercial operators are excluded.
  - Equivalent measures might raise LPF issues
- Outcome based:
  - Allocation of free allowances (benchmark)
  - Effects of ETS differ per market and thus airline
  - Retaliation might raise LPF issues