

Cefic comments on the UBA draft discussion paper: Allocation rules EU ETS post 2012 (v3, 20/07/2010)

Cefic welcomes the debate on the 3rd draft UBA discussion paper on allocation rules. We would like to provide the European Commission and Member States with our comments, also based on our experiences with a pilot project. We would appreciate if our point of view is taken into account.

Please find below our key points:

1. A **clear and unambiguous definition of “(sub-)installation”** taking the different MS permitting systems into account must be added. The term “installation” is not always used in the same way and in some chapters should be replaced by “sub-installation”.
2. **The CHP treatment and the consequences of electricity generator definition are not fairly solved.** As allocation rules should encourage GHG-efficiency no reduction factor should be applied to CHP heat generation or any other source of heat.
3. The reference period should neither be extended to include 2009 nor 2010 because the activity levels during this deep recession are unrepresentative of levels experienced in the usual economic cycle and due to uncertainties about 2010. Therefore, if the reference period is expanded by the crisis year 2009 or even 2010 (instead of 2005-2008) the option to delete one year in the reference period to account for temporary installation revisions in that base period must be extended to two or three years.
4. The industry **cap must be fully consistent with the full amount of free allowances for industry in the base period** to avoid inappropriate correction factors. Reductions in the industry cap due to a too low reference of heat related emissions and waste gases are not in line with the directive.
5. The method of **allocation to the heat consumer in case it is part of ETS** is simple, straightforward, environmentally correct and workable, both for larger and smaller sites. Extensions of non-ETS (sub-)installations that consume ETS heat should be eligible for allocation as new entrant to avoid discrimination with respect to Annex I sectors.
6. The standard capacity utilization factor (SCUF) should be based on the 10% best installations. A generic fall-back SCUF for the chemical industry should be set at 95%.
7. It is unacceptable not to allocate fallback approaches of <[1-5]% of the installation's emissions.
8. The introduction of “non-eligible emissions” necessitates a clarification that safety flaring belongs to the category of process emissions eligible for free allocations.
9. The **thresholds on significant extension for New Entrants are much too high:** Cefic advocates a threshold maximum of 10% capacity or 10.000 t CO₂e per annum or an emission increase percentage value of 10%, whichever is the smaller. Cefic supports the eligibility of consecutive growth by creep and small debottlenecks for new entrants allocation if the capacity threshold for significant expansions is reached. This secures the continuous growth of new and efficient the chemical industry installations.
10. **Capacity extensions before June 2011 should have no minimum threshold** for free allocations as these extensions have already taken place.
11. Allocations **for sub-installations under the regime of fuel/electricity exchangeability** should be floored at the benchmark level of the best 10% direct emissions and these sub-installations should automatically qualify for financial compensation of in the indirect cost of CO₂ in the power price.

Detailed Cefic comments on the discussion paper (per article):

3.1 Scope of the EU ETS

- The revised Directive requires a harmonised Community-wide approach, therefore and because of the definition of “installation” all allocation rules must be independent of different permitting practices (“permit practice proof allocation rules”).

3.2 Incumbents and new entrants

- With regard to the use of waste gases we would like you to consider an individual treatment for the specific case of Carbon Black. Please see our suggestion in section 4.14 of this paper.

3.3 Eligibility for free allocation

- No fair solution for article 10a(4) on CHPs is offered. Electricity generators should not only be eligible for allocation for heat, but be granted the same allocation for heat as any other heat generating installation. In particular the linear reduction factor in Equation 6 should be skipped. Otherwise, this reduction will lead to a discrimination of efficient heat production which cannot be an intended effect of the directive. In addition, we suggest that electricity generators should be defined as installations which exclusively produce electricity from non-waste gas fossil fuels.
- Still the **definition of electricity generator leads to a reduction of the industry cap** which doesn't match the actual emissions from heat production. Therefore emissions resulting from heat generation by electricity generators must be included in the industry cap.
- **With regard to Article 10a(1)** of the ETS directive which allows free allocation for electricity produced from waste gases Cefic demands to establish a separate regime for the specific product benchmark of Carbon Black. Please see our suggestion in section 4.14 of this paper.

3.4 NIMs

- We ask that small emitters which MS choose to exclude from the EU ETS do not have to be listed based on a full allocation application procedure in order to reduce the administrative burden.

4.1 General approach for calculating the number of free allowances

- The term “installation” is used in different paragraphs and different senses. A clear and unambiguous definition of “installation” must be added with reference to the boundaries of the GHG-permit. In the light of this definition, the word “installation” in some chapters should be replaced by “sub-installation” in order to avoid discrimination between different GHG-permit systems (e.g. in case of capacity installations in Member States with large GHG-permits would be penalised against installations in Member States with narrow GHG permits (see para 4.11 below) while the opposite penalisation will occur for some heat allocation).
- In our understanding, the cross-sectoral correction factor (CCF) should be calculated starting from the annual basis amount for each installation but taking into account the relevant carbon leakage exposure factors. Otherwise the CCF will be too strict!

4.2 Sub-installations – the concept

- Cefic supports the application of one carbon leakage factor (CLF) for one fall-back approach in case more than 95% can be attributed to this CLF as it simplifies the allocation rules.
- In contrast, it is unacceptable to introduce a de-minimis rule of <[1-5]% regarding the allocation of fallback approaches. This would not save any M&R bureaucracy, be not according to the directive but simply lead to reduced allocation and penalise sectors that made great efforts to cover as much as possible of their emissions with explicit product benchmarks. The offered alternative in the discussion paper, i.e. that the operator may propose to the CA to define another "product benchmark" sub-installation with a very close and similar definition, requires more clarification. Currently, this approach cannot be regarded as a comprehensive solution.

4.3 Allocation methods to be used for sub-installations

We tested the procedure to start from the product benchmarks and in a second step define the installations falling under the fall back methods in the pilot project. This is indeed the most workable approach.

4.4 Definitions needed for deciding on the appropriate fall back allocation method

(1) "Measurable heat" (heat benchmark allocation method):

- For completeness, **"auxiliaries" should be added to "production processes" when specifying the accountable heat.** In smaller sites, they are constructed next to the process installation. In bigger sites, they are often aggregated and located separately. Uncertainty on the allocation to auxiliaries should be avoided.

(2) Other fuel combustion:

- The chemical industry supports the exclusion of fuels, acting as reactant in a chemical reaction from this method, since no replacement by less GHG-emitting fuels is possible in those cases.
- Auxiliary fuel of flares which are necessary due to environmental, health or safety reasons should be included to this allocation method. The pilot has proved this readily feasible since the input fuel data are readily available.

(3) Process emissions:

- Point 2: "Emissions from decomposition of carbonates": specification is needed clarifying that the **use of carbonates in non-Annex I-activities is not subject to ETS.**
- Point 3: The text should be adapted in order to also accommodate a particular case in the chemical sector, as follows: "Such reactions include the reduction of metal ores, the removal of impurities from metals, or organic chemical syntheses where the "fuel" participates in the reaction as material and not for heat input only, or the use of specific hydrocarbons for stoichiometry purpose to avoid undesirable side reactions."
- Point 4: The chemical industry supports the workable proposal to allocate unavoidable combustion of waste gases due to environmental, safety or health reasons (as performed e.g. in flaring for safety or environmental reasons) as process emissions. In the view of Cefic and Europa safety and operational flaring is the occasion related activity of flaring that is required by virtue of the design of an installation for its safe and efficient operation, while taking account of unavoidable operating variability – without such flaring, the installation would not be permitted to operate." In the text it is proposed to introduce the definition of "safety flaring" as the

combustion of process off-gases on limited occasions due to safety and environmental reasons, making the recovery of those process off-gases economically not feasible. We therefore ask to rephrase the restriction “only if ... feasible” to ensure that this does not give rise to disincentives to not recover energy, even if the resulting efficiency is now comparable to that in natural gas boilers. Additionally, we propose to add to the last but one sentence of para 4.4. (3) 4. “...but where the combustion of the waste gases is necessary due to environmental, health or safety reasons” the example of **safety flaring**”.

“Non-eligible emissions”:

- Flaring should be eligible if qualified as process emission (e.g. for safety flaring as described above).
- Electricity production should be eligible if produced from qualified waste gases.

4.7 Heat benchmark allocation method (method B)

- Cefic supports the proposal to base the heat allocation for products that are not benchmarked but consume a measurable amount of heat on the consumption of heat.
- As noted above (3.3), the linear reduction factor in Equation 6 should be skipped. Otherwise, this reduction will lead to a discrimination of efficient heat production which cannot be an intended effect of the directive.
- Further it should be added: “Only district heating networks are regarded as complex networks, where especially the burden of proof is to the consumer, if such a consumer is exposed to the risk of carbon leakage”.
- Also, we support the proposal to treat heat consumption by non-ETS consumers as consumed inside the installation which produces that heat. We suggest adding a provision that safeguards the benefits of the allocation to the exposed party (the consumer), wherever possible.

4.9 Historical emissions allocation method (method D)

A “proportionate reduction factor” on process emissions as suggested should not be applied because process emissions do not show any major reduction potential – which becomes obvious from the process emission definition.

4.10 Cross boundary heat flows

We support the limitation of cross boundary heat flows to exchange of heat between ETS-producers and ETS-consumers with a different GHG-permit and the allocation to the consumer.

However, regarding situation 2 (4.10.1) the consumer should receive the full share of heat equivalent allowances to ensure that the allocation result is irrespective of the different national permitting schemes.

- Since the allocation rules for heat are based on allocation to ETS-consumers, we do not see the added value to file a joint application with producers and consumers since only the consumer and his data are relevant.
- **In case of heat consumption by non-ETS consumers we suggest to add a provision that safeguards the benefits of the allocation to the exposed party (the consumer).**

4.11 Historical activity levels

Generally, in this sub-chapter the word “installation” must be replaced by “sub-installation” in order to ensure equal treatment between different permit systems.

4.11.1 Historical activity levels: General Rule

- The reference period should neither be extended to include 2009 nor 2010 because the activity levels during this deep recession are unrepresentative of levels experienced in the usual economic cycle and due to uncertainties about 2010. Therefore, if the reference period is expanded by the crisis year 2009 or 2010 (instead of 2005-2008) the option to delete one year in the reference period to account for temporary installation revisions in that base period must be extended to two or three years. Instead of using a reference period fixing allocation regardless of the realised output, a rolling average (future allocation based on most recent average output) for products with a product benchmark would simplify many rules (e.g. on heat and temporary closures, as suggested by the COM in para 7.2). Also, this would be more in line with the aims of the Directive to avoid competitive distortions, over-allocation in case of economic downturns as addressed by the Commission in their May 2010 analysis and the risk of de-facto auctioning for growth.
- The use of the median in the base period does not take adequately into account the occurrence of both turn-around and a general reduced economical activity end 2008 and 2009. **It remains therefore essential to include the possibility to exclude the 2 (or 3) lowest activity years within that period. In addition, it is recommended to calculate the historical activity as the average over the chosen reference years.**
- It should be possible for the operator to choose the most appropriate years for deletion per sub-installation. For “fall-back” cases, the operator must be allowed to disaggregate further if verified data are available. Using a common period to delete would not reflect economic reality for those cases. Furthermore, in cases with many permits this choice will be available, in contrast with less permits or one permit for a site. These kinds of distortions must be avoided.
- In alignment with article 7.2, temporarily ceasures are not representative and must be subtracted from the reference period.

4.11.2 Specific rule 1:

- With regard to new installations during the general reference period the UBA paper suggests to use the time from start-up until 2009 (or 2010) as a reference period without the deletion of one year. But this does not reflect economic reality since start-up periods generally correspond with atypical production volumes, e.g. fine tuning etc. As no relevant and fair long enough base period can be found e.g. for installations that started operation in 2007 (e.g. the base periods would be just 2008-2010) we advocate for all these cases with start up during the reference period to use the same approach as for new entrants: production volume = capacity x SCUUF (standard capacity utilisation factor).

4.11.3 Specific rule 2: significant capacity increases or reductions between 1 January 2005 and 30 June 2011

- Capacity extensions before June 2011 should not be treated with the same principles as those that might occur after June 2011. The decisions to implement the capacity extensions before June 2011 cannot be penalized retro-actively. Hence all **capacity extensions before June 2011 should be treated as suggested under**

4.11.3, not just “significant” capacity extensions. Such minimum threshold should be applied only for “New entrants” with operational start after June 2011.

- We refer to our comments on paragraph 9.3 regarding the determination of the **standard capacity utilization factor (SCUF)**.
- The “added capacity” must be defined as the new installed capacity minus the historical activity level that was used to determine the 2013-2020 allocations. The new installed capacity is determined by the same merit order as suggested in our comments in paragraph 4.12.3.
- For fallback approaches, the procedure set out in 6.2.5 for establishing which capacity is relevant should be followed when assessing capacity increases.

4.12.3 Determination of installed capacity

We propose to change the merit order agreed between competent authorities and operators of the determination of installed capacity as follows:

1. Standard method
2. Relevant permit and approved by the competent authority
3. Experimental verification
4. Use of nameplate capacity

4.14 Rules for specific product benchmarks

We propose to add specific paragraphs for the styrene, phenol-acetone, carbon black and PVC benchmarks.

10% best in case of less than 30 installations in Europe:

- A risk of non representativeness: In many of our sectors, e.g. styrene, phenol-acetone, ethylene oxide, carbon black, adipic acid, the number of plants is small and the average of the 10% best performers may equal to only a single plant – or even less. The Chemical Industry requests to insert more plants as reference basis. The concern is that otherwise the benchmark would be based on installations with technologies that are not representative for the other plants of a subsector. As a result, even best performers could be short of allowances. In contrast, if benchmarks were based on the 3-4 best plants in case of less than 30 installations it would secure an average of best performance and a variety of the best available technologies.
- A risk of disclosing confidential data: Cefic has a concern on getting all individual data points published in the Rule Books designed to run the implementation of the ETS. Such method, potentially based on a very small number of plants, could disclose confidential performance

Case of Carbon Black:

- With regard to the use of waste gases, Cefic demands free allocation in case of energy improvement / new energy installations. As in this special case energy out of waste gas (tail gas) is considered as a “product” it should conversely be treated as new entrant.
- According to Article 10a(1) of the ETS directive free allocation shall be made in respect of any electricity production from waste gases (see also our general comment on 8.7, Point 8). This exemption should be clearly mentioned in the text. With regard to the product benchmark that was set-up for the Carbon Black sector we strongly recommend to establish a separate regime which reflects the needs of

that specific case, also with regard of allocation for heat to the producer, in a more appropriate manner.

4.14.1 Rules for specific product benchmarks: Exchangeability of fuel and electricity

- Sub-Installations that are allocated under this regime, should **automatically qualify for financial compensation of in the indirect cost of CO₂ in the power price.**
- With respect to the definitions of Equation 11:
 - The **historical direct emissions (Em dir) and the historical indirect emissions (Em indir) should be based on the available and verified average values of 2007 and 2008** in order to assure coherence between inclusion of effect of electricity and back correction as part of the product benchmark. The back correction data must refer to the same period as used for the determination of the product benchmark.
 - The elimination method used to avoid allocations due to electricity use must be corrected to ensure that for each installation the lowest benchmark value is equal to the one determined as if no heat/electricity interchangeability would be present. This is achieved by **flooring the installation benchmark value to the average of the 10% best installation without taken heat/electricity interchangeability** under consideration.

4.14.2 Rules for specific product benchmarks: CO₂ used as feedstock

Paragraph 4.13.2 relates to cases in the chemical industry where generated CO₂ can be used as feedstock for downstream products after it has been introduced in a production process in the form of fuels or other carbon containing process instead of being emitted to the atmosphere. The case of ammonia production with downstream use of CO₂ shall be taken as an example as presented at other occasions (e.g. Stakeholder Meeting on M&R). For the specific case of ammonia we reject this proposal and suggest that product benchmarks and ex-ante allocation shall be based on “generated CO₂” in order to balance stack CO₂ emissions and CO₂ used as feedstock in downstream products. Also, the annual verification of emissions and surrendering of allowances shall be based on this same “generated CO₂”.

This approach avoids undue allocation distortion and ensures a CO₂ cost neutral solution for outlet fluctuations towards beverages, urea, and melamine. Equally, it avoids an unwanted incentive to produce more urea fertilizer. Without this proposed approach, customers of pure CO₂ could switch supplier, leave the original supplier with undue high costs and ask for a price rebate from the new supplier as the latter one would generate a lot of allowance for sale. The effect of such a huge competitive distortion would be that the overall emissions remain the same.

Moreover, EU Member States are able to meet the possible future UN GHG Protocol requirements if the operators of the affected installations within the value chain report on the different CO₂ outlets which go into the air and into the downstream products. For the sake of clarity, the above does not relate to CO₂ which is captured in recognised Carbon Capture and Storage (CCS) projects.

For this reason the general allocation formula should be applied: $F = BM \times HAL \times EF$.

4.14.2 Rules for specific product benchmarks: Aromatics (including Cumene)

In section 4.14.1, it is stated that in case of interchangeability of steam and electricity, a correction will be applied for specific processes. This correction factor is essentially the ratio between the direct emissions and the sum of direct and indirect emissions of that process. Despite the fact it is indicated in section 4.14.5 that the aromatics process is

one of this processes where the interchangeability correction is applied, in section 4.14.5, the correction factor of the total site is used. In order to represent the diversity of petrochemical sites Cefic requests to use only the correction factor for the aromatics unit.

Example:

For instance, the aromatics unit could be part of a complex which contains several PE, PP or other polymer production units or could be situated on a site with electrolysis units. These units typically tend to be large consumers of electricity. An aromatics unit lying on a petrochemical site with several polymer production plants would according to formula 4.14.5 receive fewer allocations than an aromatics unit on a site with few big electricity consuming plants. Therefore, to avoid discrimination, the factor U/T in equation (15) should be calculated for the aromatics unit and not for the full site.

4.14.8 Vinyl chloride monomer (VCM)

- With respect to the definitions of Equation 16:
 - The formula does not clarify on what the **historical direct emissions (Em dir) and the historical indirect emissions (Em hydrogen) should be based on. Cefic would like to suggest using the available and verified average values of 2007 and 2008** in line with the reference period of the product benchmark. The same problem occurs for Syngas and other benchmarks where fuel and electricity is exchangeable (see also para 4.14.1).

6. Specific rules for new entrants

In this chapter the word “installation” should be replaced by “sub-installation” in order to ensure equal treatment between different permit systems.

6.1.2 Definition of significant extension of installed capacity

- Cefic welcomes that the Commission has now introduced this chapter for fall-back approaches. However, the procedure set out in 6.2.5 for determining which capacity is relevant for allocation should be followed when assessing significant extensions.
- The threshold of [10-20]% capacity extensions AND [50 000] ton extra emissions or [10-20]% more allocation is much too severe: **Cefic advocates a 10% capacity increase or a threshold maximum of 10,000 t CO₂e per annum or a percentage value of 10%, whichever is the smaller.**

6.2 Calculation of the free allocation

To encourage investment in new and hence more efficient installations, a preliminary allocation decision should be made by the competent CA towards the investor. According to this definition, important parts of the chemical industry which are not explicitly mentioned in Annex I will now be recognised under new entrant provisions. Cefic welcomes this definition which is important for the heat allocation and for being eligible as new entrant in case of production capacity expansions.

6.2.1 Calculation of free allocation: General approach

- Point 3: The linear reduction factor (1.74 %) should only be applied on the overall cap and not on the calculation for free allocation for any single installation.

6.2.2 Calculation of free allocation: Definition of “starting date of normal operation”

- Cefic suggests changing the proposed threshold of 40% to 65% in order to reflect operational reality of a plant. This issue loses its significance if COM and MS follow

our request to base the allocation of new installations and capacity extensions from the reference period on the general capacity based formula 17.

6.2.4.2 New entrants (due to significant capacity extensions)

The “added capacity” must be defined as the new activity level (production volume) minus the historical activity level that was used to determine the 2013-2020 allocations. The new activity level is determined by the same merit order as suggested in our comments in paragraph 4.12.3.

6.2.5 Determination of “historical activity levels” for fallback approaches

We suggest having the possibility for the operators to provide individual utilization degrees to the CA if verifiable data are available, or use a generic SCUF of 95% for chemical installations if no historic capacity utilization rate can be determined.

7. Specific rules for closures

In this chapter the word “installation” should be replaced by “sub-installation” in order to ensure equal treatment between different permit systems.

- A sufficiently extended time should be allowed on a case-by-case basis rather than on a given time interval for temporarily ceases to avoid misinterpretation of maintenance shut down (that can take several months and sometimes more than a year in complex sites). The re-start up after a temporarily closure must lead to fully the same allocation as before the temporary closure.
- In order to be consistent, in the determination of the historical activity level, the temporarily ceased activities must be allowed to subtract these periods from the reference period.

7.2 Installations that have partly ceased operations

This section demonstrates that a pure ex-ante approach is not a complete solution. Instead of using a reference period fixing allocation a rolling average (future allocation based on most recent average output) for products with a product benchmark would simplify many rules and address many issues (e.g. see 4.11.1).

8.1 Administration of free allocation

- Since the allocation rules for heat are based on allocation to ETS-consumers, **we do not see the added value to file a joint application with producers and consumers** since only the consumer and his data are relevant.
- We suggest minimizing the data collection to the data needed to calculate the allocations to the installations and/or sub-installations. Detailed information on e.g. emissions, heat flows or production levels that are not necessarily needed on sub-installation level for these calculations should be available for verification by the competent authority but not included in the formal report.
- The detailed data reports per sub-installation are only needed to determine the allocations for 2013-2020. There is **no need to continue the detailed reporting by sub-installation yearly throughout the period 2013-2020.**
- The industry cap must be fully consistent with the amount of free allowances for industry in the base period to avoid that an undue cross-sectoral correction factor is applied only to correct for an initially under dimensioned industry cap. Towards that end, the reference base emissions from heat (including from electricity producers), from electricity produced from waste gases and from all new Annex I related GHG emissions must be fully included in the industry cap.

8.3 Content of the baseline data reports

- Cefic suggests minimising the data collection to the data needed to calculate the allocations to the installations and/or sub-installations. Detailed information on e.g. emissions, heat flows or production levels that are not necessarily needed on sub-installation level for these calculations should be available for verification by the competent authority but not included in the formal report.
- Plausibility checks shall be made to avoid double counting or gaps, however, these should be in line with current and future monitoring requirements.

8.5.2 Determining net heat flows

The assumptions for the temperature of condensate return where data is not available are extremely conservative (90°C) and unfair. Therefore, Cefic would like to suggest using a generic factor of 50°C in cases where no measurement has been done in the past. In addition, where possible return mass assumptions should take account of individual circumstances as condensate may be used directly in the production process.

8.5.3 Proxy data for measurable heat

In case no historical heat production data are available, it is a good suggestion to work with fuel input and a calculation with suitable reference efficiency. **We support the option to use a heat production efficiency based on technical documentation or suitable measurements** because this allows the operator of the concerned installation to prove to the CA his specific verified efficiency. The proposed efficiency (0.7-0.8) does not reflect reality for all installations.

8.6 Guidance on monitoring and reporting of Production Data

We support the first guiding principle that the **same product definition as used for the determination of the benchmark curves** is applied.

8.7 Guidance on Attribution of Data to sub-installations

Whereas the section on cross boundary heat flows mentions that only consumer data are required for heat, a lot of information is requested including e.g. an entire heat balance. This implies a high administrative burden. The useful process of verification and cross checking should be kept for verification by the competent authorities but kept out of the allocation application procedure in order to minimise administrative burden.

8.7.2 Step-by-step guidance

Point 8: Electricity production from unavoidable waste gases should receive free allocation without any deduction.

Point 9: as mentioned under issue 4.14.2 we demand that CO₂ as feedstock in ammonia downstream applications are treated under the ammonia allocation and not downstream.

8.7.3 Attribution of measurable heat to sub-installations

For completeness “export heat out of product benchmarked sub-installations” should be added to the list of possible heat sources.

9.3. Annex III: Standard Capacity Utilisation Factors

The standard capacity utilization factor (SCUF) should be based on the 10% best installations within the sectors that made benchmarks since newly installed capacity uses the most recent technologies leading to improved performance.

New installations and expansions lead to higher efficiencies and therefore should not be penalized by imposing the average SCUF.

It should however be possible for the operator to provide individual utilization degrees to the CA if verifiable data are available, since this would bring allocation closer to economic reality.

In cases where a SCUF cannot be determined it is advised to i) use the historic capacity utilization rate of the previously installed capacity, or ii) use a **generic SCUF of 95% for chemical installations** if no historic capacity utilization rate can be determined; the proposed generic SCUF of 80% is much too low and not acceptable.

Also the principles for SCUF determination should not be different for new entrants and incumbents.

10.3 Annex IX: significant capacity extensions before and after 30 June 2011

It is recognized that extensions before and after 30/06/2011 are intrinsically different.

The decisions on the extensions before 30/06/2011 were made before legislation was finished. **Capacity extensions before June 2011 should not have any threshold for eligibility for free allocations.**

In case of any further questions please contact [REDACTED] ([REDACTED]@cefic.be) or [REDACTED] ([REDACTED]@cefic.be).