

**From:** [redacted]@cefic.be>  
**Sent:** vendredi 20 décembre 2019 11:20  
**To:** PESONEN Timo (GROW); JUUL-JOERGENSEN Ditte (ENER); PETRICCIONE Mauro Raffaele (CLIMA); Cecilio.MADERO-VILLAREJO@ec.europa.eu  
**Cc:** JORGENSEN Kim (CAB-VESTAGER); [redacted]  
**Subject:** Qualitative review indirect compensation EU ETS State Aid Guidelines

Dear Director Generals,

We have been informed that interservice consultation has taken place on the *"Guidelines on certain State aid measures in the context of the greenhouse gas emission allowance trading scheme post 2021"* – Indirect cost compensation for EU ETS

We understand this issue is now at Director General level.

As Director General of Cefic, I have contacted several of you already to raise attention to the fact that a sector that currently has qualified for indirect compensation, NACE 20.14 (former 24.14) *Manufacture of other organic basic chemicals*, seems to fall of the list in the coming proposal.

This sector qualified last time through a qualitative assessment, where it was able to make its case based on clear arguments. These circumstances have not changed. At the core of the sectors are the crackers, the basis of all chemical value chains in Europe.

We do not ask you to use different criteria for a quantitative assessment.

What I would like to ask is that already in the first proposal, for reasons of continuity, legal certainty and proper policy making *those sectors that are currently on the list but not match the quantitative criteria, will be allowed to again take part in the process of qualitative assessments and be eligible to make their case towards the Commission, so that a final decision can be taken based on those qualitative reviews.*

I look forward to a further dialogue with you.

Kind regards and Merry Xmas

[redacted]

[redacted]



European Chemical Industry Council - Cefic aisbl

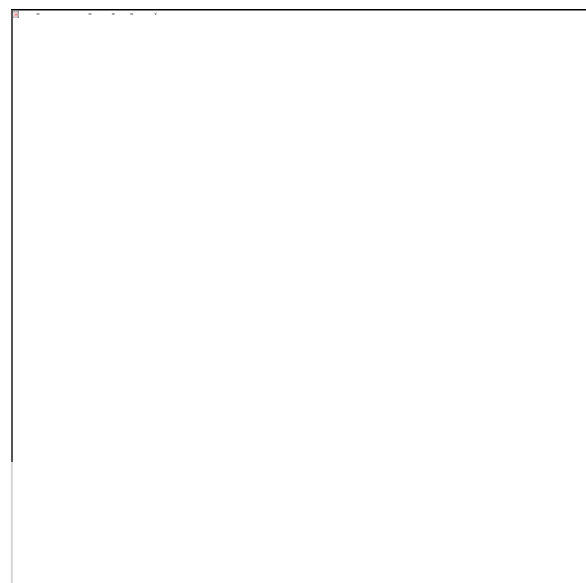
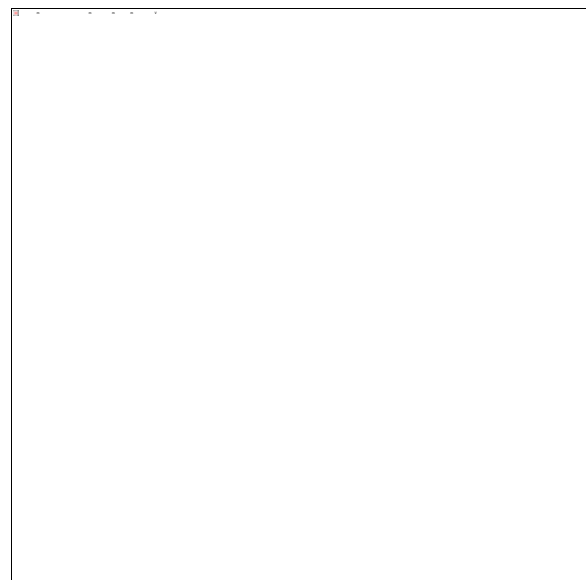
Belliard 40, 1040 Brussels

[www.cefic.org](http://www.cefic.org)



@Cefic

EU Transparency Register n° 64879142323-90



Visit our [ChemistryCan website](http://ChemistryCan.org) to discover how chemistry creates solutions for a sustainable future