



# Revision of the benchmark values for free allocation of emission allowances (2026-2030)

## Feedback to public consultation

Brussels, June 2026

### About ECOS

The [Environmental Coalition on Standards](#) (ECOS), is an international NGO with a network of member and experts advocating for environmentally friendly technical standards, policies, and laws. We are an active member of the European Commission CCEG expert group with strong expertise on key industrial sectors such as cement, steel, and chemicals.

### Feedback

We welcome the opportunity provided by the European Commission to give feedback on the public consultation on the Revision of the benchmark values for free allocation of emission allowances (2026-2030).

As ECOS, **we strongly believe in the added value of a strong EU ETS to contribute to a clean, competitive and climate neutral European industrial basis.** With the EU CBAM having become fully operational as from January 2026, we are convinced that the European Union has a solid framework in place which successfully shields European industry from carbon leakage risks.

As for the proposed delegated act, we would like to highlight the following points:

- **Continue with the foreseen update of the benchmark values:** regulatory predictability and stability is key for market actors, in particular industry frontrunners. Therefore, we urge the European Commission to stay the course on the EU ETS. Under no circumstances, we believe it is justifiable to explore a temporary freezing of the EU ETS benchmark values, as is proposed by some actors.
- **Avoid double compensation for indirect emissions due to the interaction with the ICC, in line with state aid guidelines:** the revised methodology proposed in the DA risks creating double protection for ETS installations who already receive compensation from their Member States to compensate for higher electricity prices passed on by energy producers exposed to the EU ETS. As this is aligned with EU State Aid Guidelines, we urge the European Commission to provide a transparent and periodic monitoring and reporting per ETS installation so that relevant

measures can be taken where and whenever necessary. In additions, we urge the Commission to develop a structural fix to the situation (e.g. phase out of ICC).

- **Turn the current clinker benchmark into a technology cement benchmark in the upcoming ETS1 revision:** the current revision of the benchmark values highlighted once more the urgent need to revise and update the definition of the product benchmark for grey cement clinker. While some modest and positive changes were made to the benchmark definition in the most recent revision, they fall short from providing a technology neutral ETS product benchmark for cement, in line with the ongoing technological evolutions in the sector (e.g. alternative and low-clinker cement types, electro-chemical production of cement, electric production of clinker, clinker recycling...). Such revision would also require an update of Annex I to the ETS regulation.