Umsögn

Samtök iðnaðarins

European Commission

Sent via Have your say Portal

Reykjavík, November 3rd 2026

Regarding: EU Emissions Trading System for Maritime, Aviation and Stationary and Market Stability Reserve

The Federation of Icelandic Industries ("hereafter the Federation") welcomes the opportunity to provide feedback on the European Commission´s proposal for the revision of the EU Emission Trading System (ETS) for maritime transport, aviation and stationary installations, and the Market Stability Reserve. The Federation represents aluminium and ferroalloys producers in Iceland, data centers, the construction industry as well as other sectors.

The Federation supports a slower phase-out of free allocation for sectors covered by the EU´s Carbon Boarder Adjustment Mechanism (hereafter "CBAM"), as well as an extension of free allocation for sectors not covered by CBAM. CBAM does not eliminate all carbon leakage risks while sectors outside its scope are at high risk of carbon leakage. Phasing out free allowances too rapidly can undermine the competitiveness of the European industry relative to manufacturers in countries with less stringent carbon pricing. A slower phase-out for CBAM sectors and an extended period of free allowances for non-CBAM sectors is therefore essential in safeguarding the European industrial competitiveness while providing the industry additional time to invest in decarbonization technologies.

For Iceland's aluminium and ferroalloy industries to achieve further significant emissions reductions, the development and commercial deployment of viable carbon capture technologies will be essential. Both industries already rely on renewable energy in their production processes, resulting in aluminium and ferroalloys with some of the lowest carbon footprints globally. Their access to renewable energy makes a valuable contribution to the EU's climate objectives. A slower phase-out of free allowances for CBAM sectors and an extended period of free allocation for non-CBAM sectors are therefore crucial to safeguarding the competitiveness of these industries, while allowing sufficient time for the development and deployment of the technologies needed to achieve further emissions reductions.

Respectfully,

On behalf of the Federation of Icelandic Industries

Gudny Hjaltadottir

Key Account Manager