COMMISSION OF THE EUROPEAN COMMUNITIES

COM(92) 226 final

Brussels, 30 June 1992

PROPOSAL FOR A COUNCIL DIRECTIVE INTRODUCING A TAX ON CARBON DIOXIDE EMISSIONS AND ENERGY

(presented by the Commission)

EXPLANATORY MEMORANDUM

INTRODUCTION

The European Community's action programmes for the environment adopted in 1973,[1] 1977,[2] 1983,[3] 1987[4] and 1992[5] have stressed the importance of preventing and reducing atmospheric pollution.

At its meeting in Dublin in June 1990, the European Council pressed for the adoption, at the earliest possible opportunity, of targets and strategies for limiting emissions of greenhouse gases, and in particular carbon dioxide (CO_2) emissions, given their contribution to the greenhouse effect.

Recognizing that the greenhouse effect had to be seen as a global problem, the Community nevertheless took the view that preventive measures to reduce CO_2 emissions should be taken at Community level and that more efficient use of energy should be encouraged. At its meeting on 29 October 1990 (energy/environment), the Council of Ministers undertook to stabilize CO_2 emissions in the Community at 1990 levels by the year 2000.

Following on from these undertakings and in order to launch the discussion, the Commission presented to the Council on 14 October 1991 a communication on a Community strategy for attaining the stabilization target.[6]

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1 OJ No C 112 of 20 December 1973, p. 1.

2 OJ No C 139 of 13 June 1977, p. 1.

3 OJ No C 46 of 17 February 1983, p. 1.

4 OJ No C 328 of 7 December 1987, p. 1.

5 COM(92) 23 final of 7 April 1992.

6 SEC(91) 1744 final of 14 October 1991.

The components of that strategy lie in the following four main fields:

- conventional measures and instruments, including R&D programmes and technical measures to reduce CO_2 emissions;
- national programmes designed to supplement the other measures in the light of Member States' own particular economic, cultural, geographical or technical circumstances;
- measures to help Member States in those areas where the level of pollution poses the greatest problems for them either in terms of emission abatement or as a result of economic constraints;
- tax measures, including the possibility of a specific CO_2/energy tax.

Tax measures are an important component of an overall strategy based on a "no regrets" policy, in view of their repercussions on economic performance and on the behaviour of different branches of the economy. The Commission communication also emphasizes the measures necessary to safeguard the international competitiveness of the Community economy and to ensure compliance with the principle of general tax neutrality.

The Economic Policy Committee has looked into the different aspects of the overall strategy proposed by the Commission; it presented the Council and the Commission with a report of its findings on 5 November 1991. The Committee stresses that the strategy proposed by the Commission is compatible both with the objectives pursued and with economic efficiency and recognizes the advantage of setting up new tax schemes that preserve the competitiveness of Community firms in the context of world trade.

At its meeting on 13 December 1991 (environment/energy), the Council called on the Commission to table official proposals for concrete measures to implement the Community strategy, including proposals for the tax measures necessary at Community level.

The Ecofin Council of 16 December 1991 took note of the work of the Council (environment/energy) and asked for a prior study to be carried out of the practical details and implications of a possible tax. It also stressed the need for compliance with the destination principle.[1]

The aim of this proposal is to introduce a specific tax on CO2 emissions and energy.

I. CONDITIONS FOR USE OF THE TAX INSTRUMENT

The way in which the tax instrument would be used is determined by the following concerns.

1. Long-term action

Although there are good reasons for wishing to optimize the economic operation of energy markets by internalizing the external costs - and particularly the environmental costs - which they generate but do not so far incur, we must address the question of the circumstances in which the instrument would be deployed.

1 Note from the Presidency of the Fiscal Aspects Group to the Ecofin Council (FISC 119 of 21 November 1991).

This is of no small importance in that the spectacular short-term effect brought about by vigorous measures on the prices front has to be weighed against gradual, but far-reaching long-term action geared instead to motivating economic agents.

The Commission's preference is for the latter approach.[1]

That is why the Commission is in favour of introducing the tax progressively, with the rate rising from $3 per barrel in 1993 to $10 per barrel in the year 2000.

2. Safeguarding the competitiveness of Community firms

In using taxation as an instrument for combating the greenhouse effect, the Community nevertheless has to contend with specific constraints, namely the problems of competitiveness that can arise where the additional cost incurred by Community operators employing energy-intensive processes leaves them vulnerable, on their markets both within the Community and outside, to competitors operating from countries that do not levy equivalent taxes. Care must be taken here to ensure that the introduction of the CO_2/energy tax does not have an adverse effect on growth, investment and employment.

Steps must also be taken to avert the risks of European industries being tempted to relocate to third countries where environmental standards are less stringent than in the Community.

Community operators would indirectly incur a further cost penalty if the Community economy as a whole were to suffer higher induced inflation as a result of the new tax not being neutralized so as to maintain the overall tax burden at the same level as before it was introduced.

It follows that the Community will be unable to apply the tax until such time as its main competitors within the OECD have introduced a similar tax or measures having an equivalent financial impact.

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1 SEC(91) 1744 final, point 19.

II. CONSTRAINTS ATTACHING TO USE OF THE TAX INSTRUMENT

The tax arrangements proposed below take the above factors into account and draw them together into a package that is consistent with Member States' existing tax systems so as to avoid as far as possible additional administrative costs or any interference with commitments entered into as part of the internal market programme or international agreements.

1. Need to take all the constraints into account

The arrangements for taxing carbon dioxide and energy must meet several objectives.

(a) Stage of taxation

In accordance with the rules generally accepted in the taxation field, the tax ought preferably to be levied at the stage when the energy is consumed in its final form.

We must address the question whether fossil fuels are to be taxed as soon as they enter the processing chain or only at the point when the products are delivered in their final form to users for the purpose of combustion or motor propulsion. It would thus seem preferable to tax products resulting from the coking process than to tax coal intended for coking plants when it leaves the mine.

In the case in point, tax efficiency - which increases when energy is taxed at the point furthest upstream - clashes here with traditional taxation techniques. This applies to the competitive neutrality of the tax (there should be no residual tax in the prices of derived products), to its transparency (the system should allow (i) the remission of tax on exports to third countries and on intra-Community

deliveries, and (ii) the imposition of tax on imports from third countries and on intra-Community acquisitions at the rate applicable in the country of consumption), and to allocation of the tax yield to the country where the fuel is used (destination principle). The corollary of this rule as far as international trade is concerned is that the tax should be levied at the stage closest to consumption of the energy in its final form, this being tantamount to taxation in the country of destination.

The foregoing tax considerations are vital to the functioning of the internal market and to undistorted free trade in goods between Member States and between them and third countries. The system of taxation must ensure that there is no residual tax; otherwise, it would be difficult to grant remission of tax on exports (or to tax imports) and the special treatment for industry in the form of tax incentives in particular would become more cumbersome.

(b) Special treatment for industry

The proposed system of taxation also has to contend (at least for as long as Community firms have to operate in a tax environment that penalizes them in relation to their foreign competitors) with a conflict between the effectiveness of the measures in combating the greenhouse effect and the economic interests of Community industry. The latter's costs would rise in relation to third-country competitors active on both Community and world markets. As indicated in the Commission communication of 14 October 1991,[1] the proposed arrangements include special treatment for industry.

1 SEC(91) 1744 final, point 22.

(c) Compliance with the principle of tax neutrality

All other things being equal, a new tax would add to the overall tax burden. On the whole, statutory contributions and charges are already very high in the Community, so that introduction of the new tax "should not involve increasing the tax burden".[1] Such neutrality is essential if the impact on inflation and growth of introducing the tax is to be cushioned. However, it is for the Member States to decide individually how to achieve tax neutrality.

2. <u>Incorporation in the existing tax framework</u>

As stated in the communication of 14 October 1991,[2] the system devised should be as effective and as simple as possible and should keep administrative costs to a minimum.

While satisfying established taxation principles, the proposed system as outlined above meets this condition, although it would in fact be the first tax unified at Community level in terms of both arrangements and rates.

The tax could be incorporated in existing arrangements because, in accordance with the principle of subsidiarity, many technicalities of the day-to-day management of the system could be left to the discretion of the Member States without prejudicing its very substance or creating even minor distortions.

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1 SEC(91) 1744 final, point 20.

2 SEC(91) 1744 final, point 28.

Clearly, where products are already subject to harmonized Community rules and in the case of solid fossil fuels and gas, the system of taxation envisaged is compatible with established principles, particularly in the excise duty field. Similarly, for the sake of simplicity and uniformity, existing principles and definitions have been taken as benchmarks where they can be applied to the case in point.

3. Special cases

Application of the CO_2/energy tax gives rise to certain specific difficulties as regards the need for a coherent and balanced approach to the treatment of energy.

(a) Exclusion of raw materials

Most primary energy sources and the products derived from them can be used either as feedstocks or as fuels. As stressed in the communication of 14 October 1991,[1] energy sources used as feedstocks - either in their crude state such as peat in agriculture or as derivatives, e.g. coal and oil distillates - should be exempt from the tax. Nevertheless, it is evident that, where fossil fuels are used in the production of secondary energy sources (heat, electricity), they do not count as feedstocks and should be covered, via the appropriate arrangements for those energy sources, although they are partially exempt as inputs for power generation.

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1 SEC(91) 1744 final, point 25.

(b) Exclusion of renewables

Renewable energy sources - wind power, solar energy, biomass, biofuels, etc. - should be exempt from the tax too, either because they are not responsible for CO_2 emissions and/or on account of the contribution they make to other common policies. Thé same goes for small hydroelectric installations of less than 10 MW, which are not usually harmful to the environment.

4. A tax devised at Community level

For imperative reasons to do with management, the tax arrangements to be introduced should be independent of other taxes on goods or on turnover, even where they have been harmonized. This is because, although the tax yield will accrue to the Member States, the aims of the tax and the essential arrangements for administering it will have to be established and managed at Community level.
Care also has to be taken to ensure that the tax is kept separate from other indirect taxes of a similar nature levied on the same products; otherwise, its effectiveness would be undermined.

This need for independence means that the Commission has to be given the means to ensure that the arrangements function in a consistent and flexible manner.

II. DETAILED PRESENTATION OF THE TAX ARRANGEMENTS ENVISAGED

The tax, which would be introduced at Community level but collected by the Member States, should have the following features:

1. **Tax base**

The arrangements would provide for the taxation of fossil sources of energy. One component of the tax - fixed at 50% of the total tax of ECU 17.70 per tonne of oil equivalent (toe)[1] - would be based on CO_2 emissions, while the other component would relate to the calorific value of the energy sources, whether fossil or not, excluding renewables.

The tax would be levied on all solid, viscous or gaseous fossil fuels, either in their crude state where they are used as a motor or heating fuel or in their final form where the motor or heating fuel is obtained by processing the crude product.
Confining the scope of the tax to motor or heating fuel means that raw materials are not taxed.

2. **Tax regime**

The chargeable event would be the extraction of the crude products, the production of their derivatives, or importation.

Overall, the techniques used for the practical application of the tax are essentially those introduced for excise duties, with a number of implementing details being left to the Member States in accordance with the principle of subsidiarity. This flexibility is intended to enable the Member States to optimize the use of existing administrative structures so as to reduce as much as possible the administrative burden and the cost for operators, users and the authorities.

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1 This represents a tax of $3 per barrel at the average ECU/dollar exchange rate in 1991.

Also borrowed from the existing arrangements for excise duties are the rules on the chargeable event and chargeability. Chargeability arises when the products are released for consumption. It should be noted that, on the basis of rules to be laid down by the Commission, the Member States will apply duty-suspension schemes (including for electricity), on the expiry of which release for consumption will take place. It will be left to the Member States to charge and collect the tax in accordance with established practice. Parallelism also applies as regards the production, holding, movement and monitoring of products already subject to harmonized excise duties on mineral oils and of solid fossil fuels and gas.

3. Tax rates

The tax would be additional to existing excise duties harmonized at Community level.

(a) Basic rate

In accordance with the guidelines on rates laid down in the communication of 14 October 1991, the basic rate, which would be common to all Member States, would be fixed at ECU 2.81 per tonne of carbon dioxide emitted by fossil fuels and at ECU 0.21 per gigajoule as regards the energy component; this represents a total tax of ECU 17.75 per toe, corresponding to $3 per barrel at 1991 prices. In the case of hydroelectricity generated by installations with a capacity of over 10 MW, only the "energy" component of the tax is payable, at the rate of ECU 0.76 per MW/h. The rate for the "energy" component of electricity produced using other inputs is fixed at ECU 2.1 per MW/h.

Member States which wished to do so could apply higher rates.

While it is easy to fix the total amount of tax straightaway for fluid hydrocarbons given their precise definition and homogeneity, this is not the case with solid fossil fuels (coal, lignite and peat), where the number of types and the range of quality is almost unlimited; even in the case of natural gas, quality can vary significantly. Thus, the task of implementing the above basic rate using the best available method is left to the Member States, which may choose to apply a graduated rate, thereby avoiding extra administrative costs due to unduly frequent or thorough inspections.

(b) Secondary sources of energy

The process of setting the rates of tax on heat and on the electricity generated deserves special attention. The scheme is designed in such a way that, as regards the tax component based on CO_2 emissions, the heat and electricity produced from primary fossil sources of energy are not taxed as such, but on the basis of the fossil inputs used. As indicated above, in the case of electricity, the tax component based on energy is fixed at ECU 2.1 per MW/h of electricity produced, irrespective of the input used, except for hydroelectricity, which is taxed at a rate of ECU 0.76 per MW/h.

Provision is made for the measures necessary to preserve the transparency of taxation via the requirement to indicate on invoices relating to supplies of electricity or heat the amount of tax included in the price.

In order to ensure equity with regard to the shifting of tax, it is stipulated that the amount of tax per kW/h sold is to be indicated on the invoice and that it must be the same, over a given period, for all customers of a particular firm selling electricity.

(c) Other details relating to rates

Provision should also be made for annual adjustments in the national currency equivalents of the amounts expressed in ecus and for a number of other practical arrangements, including:

- systematic annual increase of $1 per barrel (i.e. one third of the rate applicable as at 1 January 1993), and the derived effects on the average rates for heat and electricity;
- the possibility for the Council to authorize, on an exceptional basis, one or more Member States to suspend application of the tax temporarily so as to take into account the special situation in Member States, other particulars relating to the economic situation or progress towards the goal of stabilizing emissions; this possibility will be put into effect on a proposal from the Commission.

4. <u>Taking account of the situation of firms</u>

In the interests of safeguarding the international competitiveness of Community industry, specific treatment needs to be envisaged for firms.

The Commission communication of 14 October 1991 clearly underscored this need.

The aim is twofold: to safeguard the competitiveness of firms employing energy-intensive production processes (e.g. aluminium and glass), and to encourage all firms to invest in energy saving or in reducing CO_2 emissions.

(a) <u>Competitiveness of energy-intensive firms</u>

Although the intention is that introduction of the tax should be conditional on similar measures being introduced in the Community's main competitors, the competitiveness of certain firms in the Community may be harmed by the tax. This is because, in relation to firms in countries which were not among those bound by the conditionality principle and which had not introduced a CO_2/energy tax, Community firms might be faced with an unusually pronounced deterioration in their competitiveness.

Consequently, if the principle of conditionality were not sufficient to safeguard the competitiveness of industry, additional provisions would be needed.
These provisions would relate to conditional exemptions and to graduated reductions in the tax.

- **Graduated tax reductions**

The arrangements include, first of all, graduated reductions in the tax rate in line with the increase in the total energy cost burden, so as to maintain pressure for greater efficiency. Such reductions will be granted once the Commission has given its authorization.

The reduction in the amount of tax payable would be granted to firms in accordance with the following schedule when the total energy cost, inclusive of all taxes except VAT, expressed as a percentage of the value added in respect of the products obtained using the energy taken into account in determining the above cost, exceeds 8%:

Band	Reduction
8%-12%	25%
12%-17%	50%
17%-30%	75%
30% and above	90%

Taking the example of a firm which satisfies the aforementioned criteria, has a consumption equal to 15% of its value added and should, in theory, pay tax amounting to ECU 1.5 million, the tax payable will be reduced as follows:

- for the 0%-8% band no reduction, giving an amount of tax of ECU 800 000
- for the 8%-12% banda reduction of 25%, or ECU 100 000, giving an amount of tax of
  ECU 400 000 - ECU 100 000 =
  ECU 300 000

- for the 12%-15% banda reduction of 50%, or ECU 150 000, giving an amount of tax of
  ECU 300 000 - ECU 150 000 =
  ECU 150 000

The aggregate amount of tax payable is:
ECU 800 000 + ECU 300 000 + ECU 150 000 = ECU 1 250 000

- **Conditional exemptions**

There is no doubt that a straightforward exemption above a certain energy cost burden expressed as a proportion of value added - as provided for above - would give too much encouragement to firms which consume large amounts of energy since there would be hardly any incentive to use energy more efficiently. As an option, the full exemption to be introduced would be reserved for those firms which used energy-intensive production processes and were very dependent on external trade, provided that these facts were ascertained by the Member States applying the customary rules.

(b) Tax incentives for investment

Given the importance which tax incentives are bound to have for the overall strategy and for the need to ensure revenue neutrality, both of which have been recommended to the Member States, the CO_2/carbon tax arrangements contain a clause allowing the Member States to reduce the amount of tax payable by the cost of new investments made in energy saving and CO_2 abatement. They also allow for the possibility of introducing a tax credit if those investments exceed the amounts of tax payable over a twelve-month period.

The term "investment" is to be interpreted in the broad sense: it would include, for instance, research expenditure and expenditure on the development of prototypes. The nature and proportions of investment expenditure to be taken into account will be determined by the Commission.

5. Tax neutrality

The Commission is proposing the introduction at Community level of a CO_2/energy tax only on condition that the principle of tax neutrality is respected.

If agreed on, the introduction of a CO_2/energy tax will, therefore, have to be accompanied by measures ensuring that in each Member State it has a neutral effect on the overall tax burden.

(a) Justification

This means that a new tax must not involve an increase in the overall tax burden. In other words, if a new tax were to be introduced, it should be offset in full by tax incentives or by reductions in taxes and other statutory contributions for firms and individuals alike.

Observance of tax neutrality will be an essential condition of the introduction of the tax. Neutrality will have to be imposed at the same time as the CO2/energy tax is brought in, and this applies both to firms and individuals.

The main justification for monitoring is that there should be no increase in the total tax burden, i.e. the combination of taxes and social security contributions.

The particular point here is that the competitiveness of Community industry should not be harmed vis-à-vis its main competitors.
The Community's general approach is, therefore, not to increase taxation. The new CO_2/energy tax, provided it is neutral in tax terms, should help, however, to modernize taxation, through progressive reform in the medium term aimed at ensuring that taxation has a propitious effect on measures to protect the environment.

Apart from asserting this principle, it will also be necessary to clarify the arrangements for ensuring tax neutrality.

In the case in point, use of the tax instrument to reduce CO_2 emissions must be reconciled with the Community's more general objective of promoting growth, industrial competitiveness and employment.

(b) Arrangements for ensuring tax neutrality

As the Member States are responsible for collecting and administering this tax, they will have to decide on the arrangements for ensuring overall neutrality. These arrangements might include:

- Reduction in direct taxation or social security contributions;

- Reduction in indirect taxation:

  In particular, the Member States with the highest VAT rates as compared with the minimum rates adopted in connection with the abolition of tax frontiers might choose to reduce those rates;

- Tax incentives:

  . **An effective instrument**

  The use of tax incentives has shown that they could be especially effective in altering the behaviour of firms and individuals.
  For example, as a result of the tax advantge given to unleaded petrol in most Member States, consumption of this type of fuel in the Community increased from 3% of total motor fuels in 1987 to 35% in 1990.
  Similarly, the Commission has put forward a proposal for a Council directive on the introduction of a tax advantage for motor fuels from agricultural sources.[1]

  . **Technical details**

  Like the choice of taxes, the decision as to the technical details for the tax incentives should be left to the Member States.

  For instance, in addition to the proposals concerning investment by firms in reducing CO_2 emissions, an incentive might also be granted enabling firms to reduce the amount of corporation tax payable by them.

  In the case of individuals, reductions in direct taxation could be granted for the purchase of cleaner or energy-efficient equipment in the fields of housing and household appliances.

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1 COM(92) 36 of 28 February 1992.

- **Scope**

It would be for the Member States to decide on the scope of the tax incentives, which should have in common a link with activities or measures promoting energy savings or reduced CO_2 emissions.

Examples of possible measures could include the following:

- Tax incentives for electrically powered means of transport including electric vehicles and hybrid (petrol/diesel and electricity) vehicles, particularly where used for public transport

  Following an experimental project lasting several years, electric vehicles are now at a pre-industrial stage and ready for development on a wider scale. They offer promising alternatives especially as regards air-pollution problems in urban areas;

- Tax incentives for more environmentally friendly means of transport

  In a recent document,[1] the Commission stressed the importance which it attaches to cleaner forms of transport such as railways, inland waterways, sea transport, and combined transport, as well as public transport - alternatives that permit reductions in air pollution, infrastructure costs, road hazards, etc.;

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1 Green Paper on the impact of transport on the environment: a Community strategy for sustainable mobility, COM(92) 46.

- Tax incentives for forestry investment

  Forests are CO^2 "sinks" in that, through photosynthesis, they absorb CO_2 and so help to mitigate the greenhouse effect.[2] Forestry development and, more generally, deforestation and reforestation are among the Community's priorities.[3,4] It would seem appropriate to encourage such forestry development through tax incentives too;

- Residential and tertiary sector

  This sector, which accounts for some 25% of CO_2 emissions, is a major potential source of energy savings and CO_2 reductions.

  Tax incentives, for which both firms and individuals would be eligible, could be used to stimulate the appropriate investment (thermal insulation, replacement of boilers, temperature control devices, double glazing, etc.).

(c) Arrangements for monitoring tax neutrality

Given the novelty of the proposed approach, it would be important to examine periodically the cost effectiveness of the new tax, ensuring in the process that tax neutrality were effectively guaranteed.

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2 Report by the Forward Studies Unit entitled "Biomass - a new future", SEC(92) 232 of 31 January 1992.

3 Commission Communication to the Council on a Community strategy and action programme for the forestry sector, COM(88) 255 of 23 September 1988.

4 Regulations (EEC) Nos 1609/89, 1610/89 and 1614/89 concerning aspects of the implementation of forestry policy.

The conditions under which tax neutrality was applied in the different Member States would have to be regularly monitored on the basis of the information supplied by the Member States.

6. Conditionality

It is important that the taxation of carbon and energy should safeguard the Community's competitiveness and prompt other countries to follow suit. It is stipulated, therefore, that the tax arrangements will not be implemented until such time as other OECD countries have brought in a similar instrument or measures having an equivalent financial impact.

7. Scope for temporary suspension

The Commission communication of 14 October 1991 stressed the need to take account of changes in the economic situation in certain Member States and of progress made in achieving the objectives of stabilizing CO_2 emissions as a result of the introduction of the tax.

For this reason, the tax arrangements will have to stipulate that certain Member States may be authorized by the Council, acting on a proposal from the Commission, to suspend application of the tax temporarily. This might help resolve certain aspects of the problem of burden sharing.

8. Mutual assistance

It is self-evident that the Member States will apply, with regard to the CO_2/energy tax, the current provisions on administrative cooperation and assistance in the recovery and monitoring of tax.

Annex I: A few examples of taxes on products (in ecus on the basis of $3/barrel)

Product	Unit	CO2 tax 1,5	Energy tax	Total tax [5]
1. Petrol[2]	1000 l (=32,7 Gj)	6,59 (0,202)	6,87	13,46 (0,412)
2. Kerosene/aviation spirit[3]	1000 l (= 35 Gj)	7,05 (0,201)	7,35	14,40 (0,411)
3. Diesel/fuel oil[4]	1000 l (= 37 Gj)	7,66 (0,207)	7,76	15,42 (0,417)
4. Heavy fuel oil	1000 kg (= 40,2Gj)	8,77 (0,218)	8,44	17,21 (0,428)
5. Petroleum coke	1000 kg (=31,5 Gj)	8,74 (0,277)	6,62	15,36 (0,488)
6. LPG	1000 kg (=48,1 Gj)	8,66 (0,18)	10,10	18,76 (0,390)
7. Natural gas	1000 m3 (= 34,6 Gj)	5,44 (0,16)	7,14	12,58 (0,370)
8. (a) Hard coal	1000 kg (= 25 Gj)	6,5 (0,26)	5,25	11,75 (0,48)
(b) Low-grade anthracite	1000 kg (= 19 Gj)	4,94 (0,26)	3,99	8,93 (0,48)
(c) Sub-bituminous coal	1000 kg (=12,6 Gj)	3,28 (0,26)	2,64	5,92 (0,48)
9. Coke	1000 kg (= 26 Gj)	7,8 (0,30)	5,46	13,26 (0,51)
10. (a) Opencast lignite	1000 kg (=7,5 Gj)	2,25 (0,30)	1,58	3,83 (0,51)
(b) Lignite briquettes	1000 kg (= 20 Gj)	5,6 (0,28)	4,2	9,8 (0,49)
(c) Deep-mined lignite	1000 kg (= 17 Gj)	4,76 (0,28)	3,57	8,33 (0,49)
11. Peat	1000 kg (= 10 Gj)	3,0 (0,30)	2,1	5,1 (0,51)

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1 CO_2 and thermal conversion rates: source Eurostat.
2 Specific gravity: 0.74 t per 1 000 l.
3 Specific gravity: 0.81 t per 1 000 l.
4 Specific gravity: 0.87 t per 1 000 l.
5 The values in brackets represent the tax per gigajoule; the amount of the energy tax is ECU 0.21 per gigajoule in all cases.

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THE COUNCIL OF THE EUROPEAN COMMUNITIES,

Having regard to the Treaty establishing the European Economic Community, and in particular Articles 99 and 130S thereof,

Having regard to the proposal from the Commission,

Having regard to the opinion of the European Parliament,

Having regard to the opinion of the Economic and Social Committee,

Whereas the greenhouse effect is a problem that should be resolved in an efficient and coherent manner;

Whereas the establishment and functioning of the internal market necessitates free movement of goods, including those subject to specific duties;

Whereas a number of Member States have already introduced, or are planning to introduce, taxes on carbon dioxide emissions and the use of energy; whereas a harmonized approach is needed to ensure the functioning of the internal market;

Whereas Article 1(1) in fine of Directive 92/12/EEC of 25 February 1992[1] excludes from the arrangements laid down by that Directive taxes established by the Community;

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1 OJ No L 76, 23.3.1992, p. 1

Whereas the Community's action programmes for the environment adopted in 1973,[1] 1977,[2] 1983,[3] 1987[4] and 1992[5] stress the importance of reducing and preventing air pollution; whereas the 1987-92 environmental action programme stresses the importance of concentrating Community action on the priority area of reducing air pollution at source;

Whereas, at its meeting in Dublin in June 1990, the European Council pressed for the adoption, at the earliest possible opportunity, of targets and strategies for limiting emissions of greenhouse gases; whereas carbon dioxide emissions are the major component of such gases;

Whereas, at its meeting on 29 October 1990, the Council concluded that aggregate carbon dioxide emissions should be stabilized at 1990 levels by the year 2000;

Whereas the global dimension of the greenhouse effect has been recognized; whereas this phenomenon should be tackled at that level;

Whereas the introduction of a carbon dioxide/energy tax is an essential element of an overall strategy for improving the efficient use of energy and bringing about changes in the use of forms of energy in favour of less-polluting sources;

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1 OJ No C 112, 20.12.1973, p. 1.

2 OJ No C 139, 13.6.1977, p. 1.

3 OJ No C 46, 17.2.1983, p. 1.

4 OJ No C 328, 7.12.1987, p. 1.

5 COM(92) 23 final, 30.3.1992.

Whereas, in order to safeguard the competitiveness of Community industry, the tax arrangements cannot be applied in the Member States until such time as other member countries of the OECD have brought in a similar tax or measures having an equivalent financial impact;

Whereas, since the tax is to be established at Community level, it is necessary to determine the territory to which it will apply as well as the system of taxation for the products covered, the rules relating to the holding and movement of such products, and the tax rates and exemptions or reduced rates at Community level;

Whereas use of the existing administrative structures and application of the definition of territory applicable in the case of harmonized excise duties will ease the burden on the administrations and firms without giving rise to any distortions of competition;

Whereas the tax must be levied on fossil energy sources as regards its objective of limiting carbon dioxide emissions and on all forms of energy as regards its objective of promoting efficient use of energy; whereas use of energy sources as feedstocks should be excluded; whereas, however, as regards the taxation of energy as such, steps should be taken to avoid distortions between various energy sources arising in connection with the extraction process; whereas the arrangements should provide for appropriate treatment of electricity;

Whereas, in order to promote the use of alternative sources of energy, renewables should be excluded from the scope of the tax;

Whereas, in order to achieve these two objectives, the tax should be based on the energy content and on the level of carbon dioxide emissions from the products used;

Whereas, in order to ensure that the tax yield accrues to the Member States without impeding the free movement of the products subject to the tax and without giving rise to any distortions of competition, harmonized monitoring arrangements must be introduced; whereas such arrangements exist for products already subject to excise duty; whereas the Commission should adopt the appropriate measures for monitoring the other products while ensuring, however, that such monitoring does not impede their free movement;

Whereas, in order to allow economic operators to adapt in a flexible manner to the new conditions created by the tax, the rates must be fixed at a tolerable level at the outset and raised gradually to the desired level;

Whereas, subject to certain limits and conditions, the Member States should, in exceptional circumstances, qualify for temporary derogations;

Whereas, in order to safeguard the competitiveness of Community industry, it is appropriate to grant conditional exemptions from, or reductions in, the tax to energy-intensive firms in so far as their competitors in third countries are not encumbered with a similar tax or financial burden; whereas such exemptions and reductions must be authorized subject to the conditions laid down by Community law and in compliance with the Community's international commitments;

Whereas provision should be made in this connection for a system of tax incentives for investment in energy saving or carbon dioxide abatement; whereas the conditions for such incentives must be fixed uniformly in order to ensure that they do not display the characteristics of aid likely to distort the conditions of competition;

Whereas a committee needs to be set up in order to ensure that the provisions of this Directive are applied in a coordinated manner;

Whereas it is essential that introduction of the new tax should not result in an increase in the overall tax burden; whereas compliance with the principle of tax neutrality will help to modernize tax systems by encouraging behaviour conducive to greater protection of the environment; whereas tax neutrality will cushion the effects on inflation and growth of introducing the tax;

Whereas, however, determination of the arrangements for ensuring tax neutrality is a matter for each Member State,

HAS ADOPTED THIS DIRECTIVE

TITLE I - GENERAL PROVISIONS

Article 1

1. The purpose of this Directive is to provide for the harmonized introduction in the Member States of a specific tax on the products specified in Article 3 and to be levied on carbon dioxide emissions and energy content. The rate of the tax shall be in addition to the rates applied by the Member States to the products concerned by the Council Directives on the harmonization of the structures of excise duties on mineral oils[1] and on the approximation of the rates of excise duties on mineral oils.[2]

2. Member States shall take the measures necessary to collect for themselves the tax referred to in paragraph 1 and to monitor its application.

   Application of the tax arrangements provided for in paragraph 1 shall be conditional on the introduction by other member countries of the OECD of a similar tax or of measures having a financial impact equivalent to those provided for in this Directive. The Council, acting by qualified majority on a proposal from the Commission, shall fix the date on which the tax arrangements are to take effect.

Article 2

1. This Directive shall apply in the territory of the Community as defined, for each Member State, by the Treaty establishing the European Economic Community,

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1 OJ No L...., ... 1992.

2 OJ No L ......, ... 1992.

and in particular Article 227 thereof, except for the following national territories:

- in the case of the Federal Republic of Germany: the Island of Heligoland and the territory of Büsingen;

- in the case of the Italian Republic: Livigno, Campione d'Italia and the Italian waters of Lake Lugano;

- in the case of the Kingdom of Spain: Ceuta and Melilla.

2. By way of derogation from paragraph 1, this Directive shall not apply to the Canary Islands, Madeira or the Azores. However, the Kingdom of Spain or the Portuguese Republic may give notice, by means of a declaration, that this Directive applies to those territories in respect of all or some of the products specified in Article 3 as from the first day of the second month following deposit of that declaration.

3. By way of derogation from paragraph 1, this Directive shall not apply to the overseas departments of the French Republic. However, the French Republic may give notice, by means of a declaration, that this Directive applies to those territories, subject to measures to adapt to their extreme remoteness, from the first day of the second month following deposit of the declaration.

4. The provisions of this Directive shall not prevent Greece from maintaining the specific status granted to Mount Athos and guaranteed by Article 105 of the Greek Constitution.

5. If the Commission considers that the exclusions provided for in paragraphs 1 to 3 are no longer justified, particularly in terms of fair competition, it shall present appropriate proposals to the Council.

Article 3

1. The tax referred to in Article 1(1) shall be levied on the products specified below and intended for use as heating fuels or as motor fuels:

   (a) coal, lignite, peat and their derivatives (coke, gas, tar, etc.), with the exception of blast-furnace gas, falling within CN codes 2701 to 2706;

   (b) natural gas falling within CN codes 2711 21 00 to 2711 29 00;

   (c) mineral oils; the following shall be considered as such for the purposes of this Article:

      - products falling within CN codes 2707 10, 2707 20, 2707 30, 2707 50, 2707 91 00 and 2707 99 (with the exclusion of CN codes 2707 99 30, 2707 99 50 and 2707 99 70);

      - products falling within CN code 2709;

      - products falling within CN code 2710;

      - liquefied petroleum gases falling within CN codes 2711 12 11 to 2711 19 00;

- products falling within CN codes 2712 20 00, 2712 90 31, 2712 90 33, 2712 90 39 and 2712 90 90;

- products falling within CN codes 2712 10 and 2713, with the exception of resinous products, used bleaching earth, acid residues and basic residues;

- products falling within CN code 2715;

- products falling within CN code 2901 and CN codes 2902 11 00, 2902 19 90, 2902 20, 2902 30, 2902 41 00, 2901 42 00, 2902 43 00 and 2902 44;

- products falling within CN codes 3403 11 00 and 3403 19;

- products falling within CN code 3811;

- products falling within CN code 3817.

2. The tax referred to in Article 1(1) shall also be levied on:

   (a) ethyl and methyl alcohol falling within CN codes 2207 and 2905 where obtained by distillation from products specified in paragraph 1 and intended for use as heating fuels or as motor fuels. The tax shall also be levied on any other product intended for use, offered for sale or used as motor fuel or as an additive or extender in motor fuels, with the exception of those specified in paragraph 3 below;

(b) electricity falling within CN code 2716, and heat, generated:

- in hydroelectric installations with a capacity of over 10 MW;

- or using products falling within CN codes 2612, 2844 10 to 2844 50 and 2845 10.

3. The tax referred to in Article 1(1) shall not be levied on:

- fuel wood and wood charcoal falling within CN codes 4401 and 4402, and products resulting from the distillation or processing of wood;

- any product of agricultural or vegetable origin obtained directly or after chemical modification, and in particular alcohols falling within CN codes 2207 and 2905 and crude or esterified vegetable oils falling within CN codes 1507 to 1518.

4. Products specified in paragraphs 1 and 2 and used in metallurgical or electrolytic processes shall be regarded as being intended for use as heating fuels.

TITLE II - CHARGEABLE EVENT AND CHARGEABILITY

Article 4

1. The chargeable event for the tax shall be the extraction or manufacture of the products specified in Article 3 on the territory of the Community, as defined in Article 2, or their importation into that territory.

2. Member States shall not be obliged to treat as "extraction or manufacture of products":

   (a) operations during which small quantities of products specified in Article 3(1) and (2)(a) are obtained incidentally;

   (b) the operation consisting of mixing in a tax warehouse products specified in Article 3(1) and (2)(a) with other products or substances specified in that same Article provided that:

      - the tax referred to in Article 1(1) and chargeable on the basic substances has been paid previously, in cases where the mixture obtained is intended for use as heating fuel or as motor fuel;

      - the amount paid is not less than the amount of the tax referred to in Article 1(1) that would be chargeable on the mixture intended for use as heating fuel or as motor fuel.

3. The consumption of products specified in Article 3 on the site of an establishment in which these products or some of them are obtained shall not be considered as a chargeable event for the tax referred to in Article 1(1), except where such consumption is for purposes not related to that production.

Article 5

1. The tax referred to in Article 1(1) shall become chargeable at the time of release for consumption or when shortages are recorded.

   Release for consumption of products subject to the tax means:

   (a) any departure, including irregular departure, from a suspension arrangement;

   (b) any extraction or manufacture, including irregular extraction or manufacture, of those products outside a suspension arrangement;

   (c) any importation, including irregular importation, of those products where they have not been placed under a suspension arrangement.

2. The chargeability conditions and rate of the tax referred to in Article 1(1) shall be those in force on the date on which the tax becomes chargeable in the Member State where release for consumption takes place or shortages are recorded.

   The tax shall be levied and collected according to the procedure laid down by each Member State, it being understood that Member States shall apply the same procedures for levying and collection to national products and to those from other Member States.

TITLE III - PERSONS LIABLE FOR PAYMENT OF THE TAX: HOLDING AND MOVEMENT OF PRODUCTS

Article 6

The tax referred to in Article 1(1) shall be payable by persons who carry out a taxable transaction within the meaning of Article 5.

Article 7

1. The production, holding, movement and monitoring of the products specified in Article 3(1) and (2)(a) shall be determined in accordance with the provisions of Council Directive 92/12/EEC of 25 February 1992 on the general arrangements for products subject to excise duty and on the holding, movement and monitoring of such products.[1]

2. In the case of electricity falling within CN code 2716 and generated using products or in installations specified in Article 3, the Commission shall, where necessary, determine the appropriate measures relating to trade between Member States and with third countries in accordance with the procedure provided for in Article 13.

3.(a) Invoices issued by electricity-generating enterprises shall indicate the amount of tax per kW/h supplied and the total amount of tax payable on the inputs used for the electricity supplies invoiced; these amounts of tax shall be indicated on invoices issued by electricity-distributing enterprises.

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1 OJ No L 76, 23.3.1992, p. 1.

(b) The amounts of tax shown on invoices shall be the same per kW/h for all the customers of electricity-producing or electricity-distributing enterprises over a given period.

4. Invoices issued in respect of supplies of the primary energy sources specified in Article 3(1) and (2)(a) shall indicate the unit rate of the tax applied and the amount payable; such information shall, where appropriate, be given on a pro rata basis on invoices issued in respect of subsequent supplies.

TITLE IV - DETERMINATION OF THE TAX BASE

Article 8

The tax base shall be:

- for the energy component of the tax: the energy content of the products specified in Article 3(1) and (2). However, electricity as specified in Article 3(2)(b) and that generated using the products referred to above shall be taxed on the basis of the electricity generated, the said products used being exempt from the tax;

- for the carbon dioxide component of the tax: the volume of carbon dioxide emitted on combustion in the presence of excess oxygen of the products specified in Article 3(1) and (2)(a).

TITLE V - RATES

Article 9

1. The rates of the tax referred to in Article 1(1) shall be determined as follows:

   (a) for the products specified in Article 3(1)(a) and (b) and (2)(a), with the exception of the products specified at (b) below:

   - ECU 2.81 per tonne of carbon dioxide emitted on combustion in the presence of excess oxygen, and

   - ECU 0.21 per gigajoule of energy content. However, electricity as specified in Article 3(2)(b) and that generated using the products specified in Article 3(1) and (2)(a) shall be taxed at the rate of ECU 2.1 per MW/h, with the exception of electricity generated by the hydroelectric installations specified in the first indent of Article 3(2)(b), which shall be taxed at the rate of ECU 0.76 per MW/h.

   In the interests of simplifying application of the tax and effective monitoring, Member States may, in the case of coal, lignite, peat and natural gas, apply a simplified tax schedule based on bands each equivalent to 5% of the carbon content convertible into carbon dioxide on combustion in the presence of excess oxygen and to 1.5 gigajoule of energy content of the crude products per tonne of solid fossil energy sources or liquefied petroleum gas or per 1 000 m^3 of non-liquefied gas;

(b) for mineral oils:

- leaded or unleaded petrol falling within CN codes 2707 and 2710: ecu 13.46 per 1 000 l;

- diesel and gas oil as defined in additional note 1(f) of CN Chapter 27: ecu 15.42 per 1 000 l;

- kerosene and aviation fuel as defined in additional note 1(d) of CN Chapter 27: ecu 14.40 per 1 000 l;

- heavy fuel as defined in additional note 1(g) of CN Chapter 27: ecu 17.21 per 1 000 kg;

- petroleum coke, etc. falling within CN codes 2713 11 00 to 2713 90 90: ecu 15.36 per 1 000 kg;

- liquefied petroleum gases falling within CN codes 2711 12 11 to 2711 19 00: ecu 0.39 per gigajoule;

(c) Member States may apply a higher rate than that provided for at (a) and (b).

2. The value in national currency of the ecu to be taken into consideration in applying this Directive shall be fixed once a year. The rates to be applied shall be those obtaining on the first working day in October with effect from 1 January of the following year.

Member States may round the amounts in national currency resulting from conversion of the amounts in ecus referred to in the first paragraph in accordance with their own rules provided that the rounding operation does not result in an amount that is higher or lower than the conversion value by more than 5%.

3. For the first time at the end of the twelfth month following the date specified in Article 1(2) and at the end of each of the ensuing six periods of twelve months, the Commission shall, in accordance with the procedure provided for in Article 13, raise the rate of the tax by one third of the amount fixed in paragraph 1.

4. Exceptionally, the Council, acting unanimously on a proposal from the Commission, may, if so requested and on the basis of information obtained by it in connection with the Council Decision for the monitoring mechnism of Community CO2 and other greenhouse gas emissions[1] and additional information provided in this respect, authorize one or more Member States to suspend temporarily the application of the tax in order to take account of the particular situation in Member States, developments in the economic situation, and progress made in achieving the objective of stabilizing carbon dioxide emissions.

5. Products subject to the tax referred to in Article 1(1) shall be exempted from the tax where they are intended:

   - for delivery in the context of diplomatic or consular relations;

   - for international organizations recognized as such by the public authorities of the host Member State and by members of such organizations, within the limits and under the conditions laid down by the international conventions establishing such organizations or by headquarters agreements;

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1 COM(92)181 final of 1.6.1992

- for the armed forces of any State party to the North Atlantic Treaty other than the Member State within which the tax is chargeable as well as for the armed forces referred to in Article 1 of Decision 90/640/EEC,[1] for the use of those forces or for the civilian staff accompanying them;

- for consumption under an agreement concluded with third countries or international organizations provided that such an agreement is allowed or authorized with regard to exemption from VAT.

These exemptions shall be subject to the conditions and limitations laid down by the Commission in accordance with the procedure provided for in Article 13. Eligibility for exemption may be granted in accordance with a procedure for reimbursing the tax.

Article 10

In the case of firms with a high energy consumption that are seriously disadvantaged on account of an increase in imports from third countries which are not specified in Article 1(2) and which have not introduced a similar tax or measures having an equivalent financial impact, the Commission may authorize Member States, after notification of the corresponding plans, to grant such firms:

(i) a graduated reduction in the tax payable under Article 9 or an equivalent refund where the total energy cost, inclusive of all taxes except VAT, expressed as a percentage of the value added as defined in Article 2 of Directive 67/227/EEC of

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1 OJ No L 349, 13.12.1990, p. 19.

11 April 1967[1] generated in respect of the products obtained using the energy taken into account in determining the above cost, amounts to at least 8%;

(ii) a full and temporary exemption from the tax referred to in Article 1(1) or an equivalent refund provided that the firms have made substantial efforts to save energy or to reduce carbon dioxide emissions.

The conditions for granting the tax reductions or exemptions referred to at (i) and (ii) above shall comply with the rules of Community law and with the Community's international commitments.

Article 11

Member States shall reduce the amounts of tax payable or, where appropriate, grant equivalent refunds to the extent of new investment expenditure incurred by a firm during a given reference period in improving the efficient use of energy or in limiting carbon dioxide emissions. The nature and proportion of the investment expenditure taken into consideration and the reference period shall be determined by the Commission in accordance with the procedure provided for in Article 13. Where the amount of such expenditure exceeds the amount of tax payable or paid, a tax credit or a corresponding entitlement shall be carried over to subsequent years.

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1 OJ No L 71, 14.4.1967, p. 1302.

Article 12

The arrangements for granting tax exemptions, reductions or refunds referred to in Article 10 and the arrangements for tax incentives referred to in Article 11 shall be reviewed every three years.

Before expiry of each three-year period, and for the first time before expiry of the third year of application of the tax, the Commission shall present to the Council a report on the operation of the system accompanied, where appropriate, by a proposal for amending this Directive.

TITLE VI - COMMITTEE ON THE CARBON DIOXIDE/ENERGY TAX

Article 13

1. The Commission shall be assisted by a Committee on the Carbon Dioxide/Energy Tax, hereinafter referred to as the "Committee". The Committee shall be composed of representatives of the Member States and chaired by a Commission representative.

2. Without prejudice to the matters falling within the remit of the Committee provided for in Directive 92/12/EEC of 25 February 1992,[1] the measures necessary for the application of the provisions of this Directive shall be adopted in accordance with the procedure laid down in paragraphs 3 and 4.

3. The Commission representative shall submit to the Committee a draft of the measures to be taken. The Committee shall deliver its opinion on the draft within a time-limit which the Chairman may lay down according to the urgency of the matter. It shall take its decision by the majority laid down in Article 148(2) of the Treaty. The Chairman and the Commission representative shall not vote.

1 OJ No L 76, 23.3.1992, p. 1.

4. The Commission shall adopt the intended measures where they are in accordance with the Committee's opinion. Where the intended measures are not in accordance with the Committee's opinion or in the absence of any opinion, the Commission shall forthwith place before the Council a proposal relating to the measures to be taken. The Council shall act by qualified majority.

   If, on expiry of a period of three months from the date on which the matter was referred to it, the Council has not adopted any measures, the Commission shall adopt the proposed measures.

5. In addition to the measures referred to in paragraph 2, the Committee shall examine the matters raised by its Chairman, either on his own initiative or at the request of the representative of a Member State, and concerning the application of the Community provisions on the tax referred to in Article 1(1).

TITLE VII - MUTUAL ASSISTANCE

Article 14

1. A fifth indent shall be added to Article 1(1) of Directive 77/799/EEC[1] , as last amended by Directive 92/12/EEC[2]:

   "- the carbon dioxide/energy tax introduced by Council Directive 92/.../EEC of .../1992[1].

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   [1] O.J. No L ...of ....1992, p. .."

2. A fourth indent shall be added to Article 3(f) of Directive 76/308/EEC[3], as last amended by Directive 92/.../EEC of ....1992[4].:

   "- the carbon dioxide/energy tax introduced by Council Directive 92/.../EEC of ... 1992[1].

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   [1] OJ No L ... of .... 1992, p. ...."

TITLE VIII: GENERAL TAX NEUTRALITY

Article 15

1. Member States shall:

   - notify the Commission, when introducing the tax referred to in Article 1(1), of the steps they have taken to ensure tax neutrality;

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1 OJ No L 336, 27.12.1977, p. 15
2 OJ No L 76, 23.3.1992, p. 1
3 OJ No L 73, 19.3.1976, p. 18
4 OJ No L ..., ...1992, p. ..

- inform the Commission each year of the conditions under which tax neutrality has been achieved.

2. The measures taken by the Member States to ensure tax neutrality shall comply with Community law.

TITLE IX - FINAL PROVISIONS

Article 16

1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive on 1 January 1993.

   When Member States adopt them, such measures shall contain a reference to this Directive or shall be accompanied by such reference on the occasion of the their official publication. The arrangements for making such a reference shall be laid down by Member States.

2. Member States shall inform the Commission of the main provisions of national law which they adopt to comply with this Directive.

Article 17

This Directive is addressed to the Member States.

Done at Brussels, For the Council,

The President

FICHE D'IMPACT SUR LES PME ET L'EMPLOI

La présente proposition de directive vise, dans le cadre de la stratégie communautaire de limitation des émissions de dioxyde de carbone, à instaurer une taxe communautaire sur le dioxyde de carbone émis et sur l'énergie dont le revenu revient aux Etats membres.

I. Obligations administratives découlant de l'application de la présente directive pour les entreprises:

- la circulation, la détention et le contrôle des produits soumis à la taxe ne requièrent, dans une très grande majorité des cas, que l'utilisation de documents administratifs ou de méthodes administratives existants.

II. Quel sont les avantages pour les entreprises?

Du fait des dispositifs prévus aux articles 10 et 11 (traitement allégé des entreprises) et à l'article 15 (neutralité fiscale) l'impact sur les entreprises sera limité, voire positif, dès lors qu'elles s'engagent dans des réductions de leurs émissions de CO2.

III. Y-a-t-il des inconvénients pour les entreprises en termes de coûts supplémentaires?

Les coûts pour certaines entreprises devraient s'accroître. Cependant la directive prévoit des mesures d'exonération, de réduction de taux ou de suspension de la taxe dans des cas particuliers (entrepries à haute intensité d'utilisation d'énergie, les énergies renouvelables, les entreprises qui s'engagent par des accords volontaires à lutter contre les émissions de CO2 ou à utiliser de façon plus rationnelle l'énergie).

En tout état de cause, le système envisagé évite les distorsions de concurrence entre entreprises européennes. De plus, une neutralité fiscale au plan des prélèvements obligatoires globaux est recommandée aux Etats membres.

IV. Effets sur l'emploi:
En principe: néant.

V. Les partenaires sociaux n'ont pas été consultés.

VI. Le volet fiscal fait partie d'un ensemble de mesures en vue de combattre l'effet de serre.

ISSN 0254-1475

COM(92) 226 final

DOCUMENTS

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Catalogue number : CB-CO-92-250-EN-C

ISBN 92-77-44818-0

Office for Official Publications of the European Communities
L-2985 Luxembourg