

Mr António Costa
President of the European Council
Ms Ursula von der Leyen
President of the European Commission

Cc:
Executive Vice-President Teresa Ribera
Executive Vice-President Stéphane Séjourné
Commissioner Wopke Hoekstra
Commissioner Valdis Dombrovskis

Brussels, 8 April 2026

Subject: Concerns of the European Ceramic Industry regarding ETS Benchmarks Review (2026–2030)

Dear President Costa,

Dear President von der Leyen,

On behalf of the European ceramic industry, we would like to express our serious concerns regarding the recently unofficially presented in press: **Commission draft implementing act determining revised benchmark values for free allocation of emission allowances for the period from 2026 to 2030.**

Despite the Commission’s commitment, made in the context of the European Council of 19-20 March, to update the ETS benchmarks “*taking into account concerns expressed by industry*”, the proposed values for the ceramic relevant revised benchmarks are identical to draft values circulated before the European Council and do not represent any improvement reflecting our industry’ concerns.

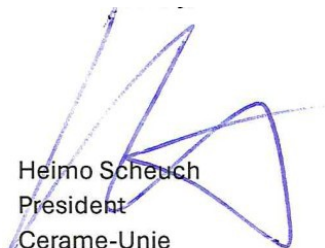
Accordingly, and as substantiated with detailed data submitted to the Commission’s services, such values will have a significant negative impact on the competitiveness of our sector and they do not align with the current technological and economic realities of the ceramic industry. At present, viable low-carbon alternatives remain limited. Electrification of firing processes is not yet economically and technologically feasible, green hydrogen is not available at scale in the short or medium term, and biomass cannot provide a comprehensive solution due to the lack of its availability and regulatory barriers at the national level. As a result and as illustrated in the table [in Annex](#), the CO₂ efficiency gains in the ceramic sector have been very limited in the last decade as natural gas has remained the best available technology in terms of CO₂ emissions for ceramic processes. Consequently, a reduction of the ETS benchmarks relevant to ceramics – including the fallback “fuel” benchmark – by up to 35% compared to 2020-25, would be completely disconnected from this reality.

At the same time, the sector is already facing rising CO₂ costs and high energy prices. Carbon costs are estimated to reach €7.6 billion in the period 2021-2030 (assuming the CO₂ price reaches 140 EUR/t by 2030), with carbon costs expected to triple between 2025 and 2026 due to the maximum update rates being applied to the ETS benchmark reductions. Such tightening of benchmarks risks further undermining production in the EU to the benefit of production in third countries with lower environmental & social standards, weakening investment capacity, and ultimately delaying the transition to low-carbon technologies in the period of high energy prices and the manufacturing crisis.

We believe that the methodology for updating the ETS benchmarks should better reflect the specific constraints of the ceramic sector. A more differentiated approach should be considered, taking into account the availability of technologies and energy sources. In addition, the installations relying on solutions that are not scalable at industrial level should be treated as outliers and excluded from the benchmarks calculations.

In the meantime and until the methodology can be adapted, and given the current economic, industrial and difficult geopolitical context, we consistently **urge the European Commission to suspend further reductions of the ETS benchmarks for the period 2026–2030, keeping the benchmarks at the same level as in 2021-2025, which was already on average 22,4% lower for ceramics compared to 2013-2020 benchmark levels.** This would provide a necessary prerequisite to restore the stability required for the ceramic industry to recover from recent crises and resume its investments in decarbonisation.

Yours sincerely,



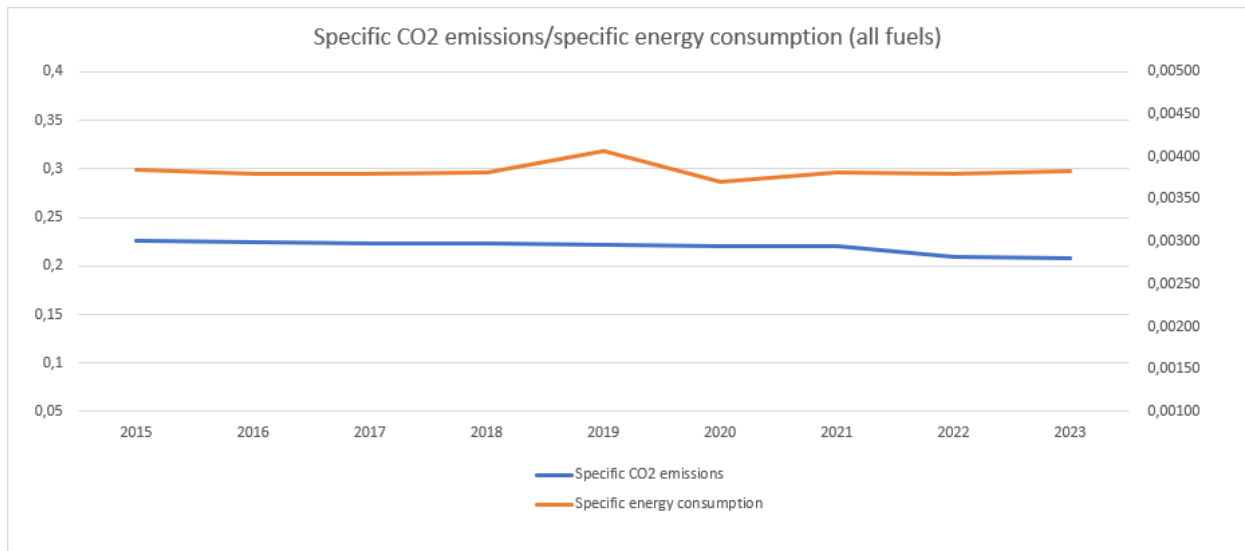
Heimo Scheuch
President
Cerame-Unie

Signed on behalf of Cerame-Unie and the Presidents of all ceramic sectors directly affected by the ETS benchmark updates:

- Mario Cunial, Vice-President of Cerame-Unie - Industrie Cotto Possagno
- Pau Abello, incoming President of FECS (sanitaryware) - Roca Group
- Charles Bernardaud, President of FEPF (tableware) - Bernardaud
- Murray Rattana-Ngam, President of TBE (bricks & roof tiles) - Ziegelwerk Bellenberg Wiest GmbH
- Matthias Stalzer, President of PRE (refractories) – RHI Magnesita
- Johan van der Biest, President of FEUGRES (vitrified clay pipes) – Wienerberger
- Richard van Doesburg, President of EXCA (expanded clay)
- Graziano Verdi, President CET (wall & floor tiles) - Italcra Group

Annex: CO2 reduction trend in ceramic v/. production benchmark reduction

No major reduction can be observed in the specific CO2 emissions and specific energy consumption across the ceramic industry (Below graph presents aggregated values for all ceramic sectors, all products and all fuel sources).



Source: Cerame-Unie data collection

There is a large discrepancy between the average CO₂ intensity trend observed in the EU ceramic industry as illustrated in the graph above, and the benchmark values' reduction draft proposals circulated on 1 April:

Ceramic ETS benchmarks - reductions since their adoption in 2011 - 2026 based on draft leaked proposal of 01/04/26						
Benchmarks relevant to the ceramic industry	2013-2020 Benchmark values (10% best installations in 2007-2008) - adopted in 2011	2021-2025 Benchmark values (reduction based on 10% best installations in 2016/2017 compared to 2007-2008)	% variation (2011-2021)	(Draft) 2026-2030 Benchmark values (reduction based on 10% best installations in 2016/2017 compared to 2007-2008)	% variation (2011-2026) (based on leaked draft proposal of 01/04/26)	% variation (2025-2026) (based on leaked draft proposal of 01/04/26)
Fuel benchmark	56,10	42,60	-24,06	28,10	-49,91	-34,04
Facing bricks	0,139	0,106	-23,74	0,085	-38,85	-19,81
Pavers	0,192	0,146	-23,96	0,108	-43,75	-26,03
Roof tiles	0,144	0,12	-16,67	0,121	-15,97	0,83
Spray-dried powder	0,076	0,058	-23,68	0,046	-39,47	-20,69