UPEI
THE VOICE OF EUROPE'S INDEPENDENT ENERGY AND MOBILITY SUPPLIERS

For the kind attention of:

Mr. Darragh O'Brien, Minister for Transport and for Climate, Energy and the Environment, Ireland.
Mr. Wopke Hoestra, Member of the European Commission, Climate, Net Zero and Clean Growth.
Mr. Dan Jørgensen, Member of the European Commission, Energy and Housing.
Mr. Apostolos Tzitzikostas Member of the European Commission, Transport.

Concerns: Early auctioning of ETS2 allowances

Brussels, 30 October 2026.

Dear Minister, dear Commissioners,

UPEI, the voice of Europe's independent energy and mobility suppliers, has followed very closely the preparation, the adoption, and the steps towards the implementation of the ETS2 Regulation, which, as it affects energy for road transport and heating, directly concerns our members. In a position paper of 29 June 2026, we clearly indicated our conviction that the ETS2 is not an appropriate tool for our sector and called to review - alongside the revision of ETS1 - its necessity, proportionality, and appropriateness for the transport sector.

The application of the Regulation has been postponed from 1st January 2027 to 1st January 2028, but several Member States, most recently the Visegrad Group in a statement on 19 October, are calling for its further postponement to 2030. The primary reason for this request for a postponement is the social impact on society, at a time when many Member States have introduced emergency measures aimed at reducing energy prices.

However, the Member States are currently focusing exclusively on the prices of crude oil and diesel, whilst high gas prices are to be expected in the coming months. We would add that the chosen ETS2 mechanism has the potential to cause significant damage to the fuel market and could lead to the closure of small and medium-sized enterprises, in particular.

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In this context, UPEI has observed with great concern that the early auctioning of ETS2 allowances is still scheduled for 18 January 2027, as confirmed on 30 September by the common auction platform for ETS1 and ETS2 (EEX - European Energy Exchange).

Considering the uncertainties on the effective date of application of the ETS2, UPEI strongly requests the postponement of the early auctioning calendar and would highly appreciate your consideration for this request. We fear that once pre-trading begins, it will be difficult, if not impossible, to make adjustments to the ETS2 mechanisms.

We remain at the disposal of your Cabinets, of the Commission services in DG CLIMA and DG ENER and of the administration of the Irish Ministries for Transport and for Climate, Energy, and the Environment to discuss this matter.

Yours sincerely,

Pierre Lucas
Secretary General

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