

The **German Emissions Trading Association** (bvek – Bundesverband Emissionshandel und Klimaschutz e.V.) is a non-for-profit organization registered in Berlin (Germany). **Bvek** is in favour of an economically efficient system of tradable emission allowances for the protection of the climate. The European Union System of tradable emission allowances and its current implementation in Germany are in urgent need of improvement. The rules and regulations need to be made more market-oriented and less bureaucratic. Complete auctioning of allowances without any exception has to be introduced. The EU internal boundaries have to be extended and all sectors, especially the ground traffic and households, have to be included on an upstream basis. Externally, the EU system has to be linked to other national or regional systems under consideration as well as the system for international air and sea traffic. In the long term, this system has to be extended to a truly global system covering all countries and all emitters.

In this period of transition the Clean Development Mechanism shall be subject to a governance and institutional reform leading to a more efficient and legitimate fulfilment of its mandate and it has to include mechanisms that will deliver a direct contribution to the reduction of global GHG emissions, such as the discounting of CERs by a factor taking into account per capita emissions and per capita income of the host country.

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