# EU ETS Market Stability Reserve review: Flexibility is the magic word

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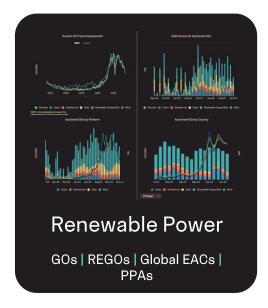
Ariadne project, Brussels 8 December 2025

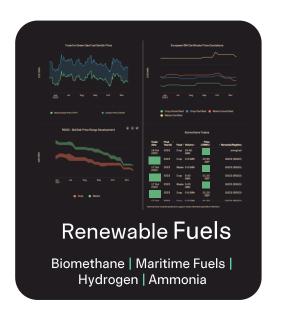


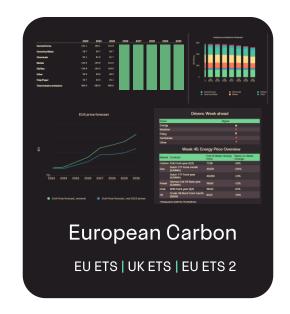


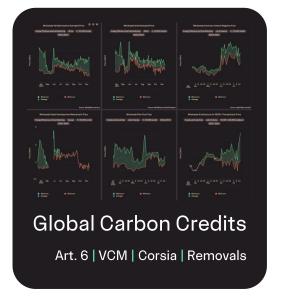
# Net-zero market solutions

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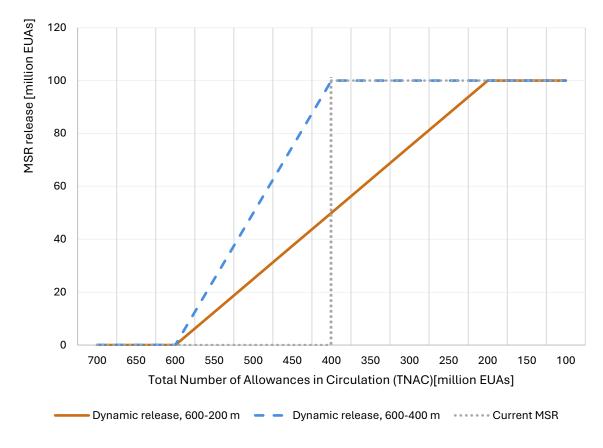






# The dynamic MSR trigger function supports a more targeted release

#### MSR release rate as a function of the TNAC value

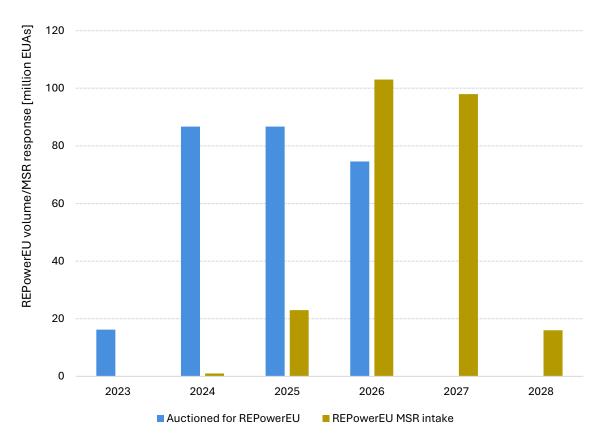


#### Technicalities of the release will be key for price foundation

- Step-function with current set-up
- Dynamic release accounts for the marginal value of each allowance in the MSR
- Allows for the MSR to release for a longer period, adding supply back to the market when it gets significantly tight
- Buffer (starting at 600m) accounts for the fact that TNAC is not the "real" oversupply due to accounting rules for aviation sector demand (pre-2024) and Effort-sharing flexibility

### Implications of REPowerEU on MSR operations

#### REPowerEU volumes increase the MSR intake



#### EU ETS is getting tighter as a result of REPowerEU

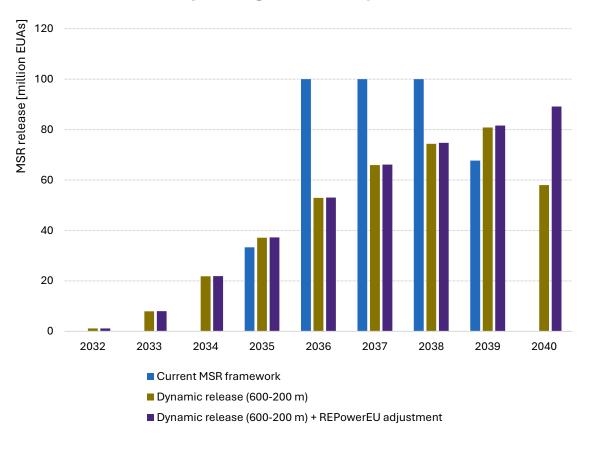
- MSR holdings are limited to 400 million allowances; all additional allowances are invalidated
- REPowerEU monetization happens during a period when the MSR is actively withdrawing allowances
- Frontloaded REPowerEU volumes are agnostically treated by the MSR as additional supply
- This results in more than 200 million allowances being soaked up by the MSR and invalidated as a result of REPowerEU.
- This is why an increased MSR holding by these volumes is re-installing cap neutrality
- But, he market-tightening effect is twofold. Due to the frontloading nature, REPowerEU volumes are also missing in a period when the market is getting very tight.



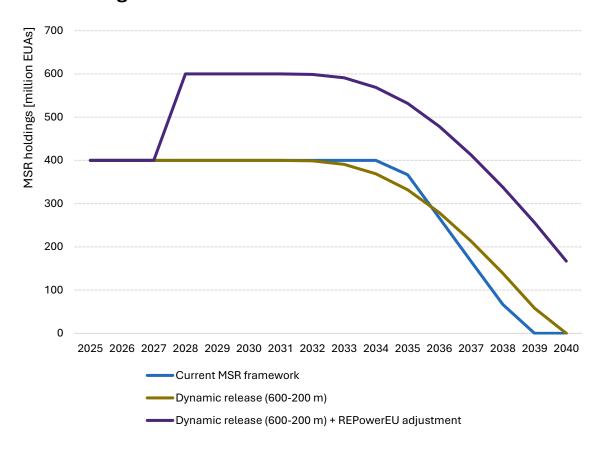
Note: 2023 shows only front-loaded volume not the repurposed volumes from Innovation Fund. REPowerEU volume in 2026 is estimated based on 2025 average EUA auction price and might be subject to revision.

## Amendments to MSR can add more flexibility to the system when the balance gets tight

#### MSR release can be prolonged with > 4 years

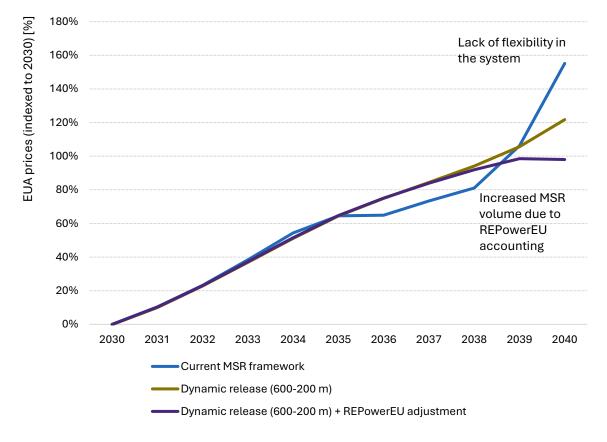


#### MSR holdings show a different rate of decline

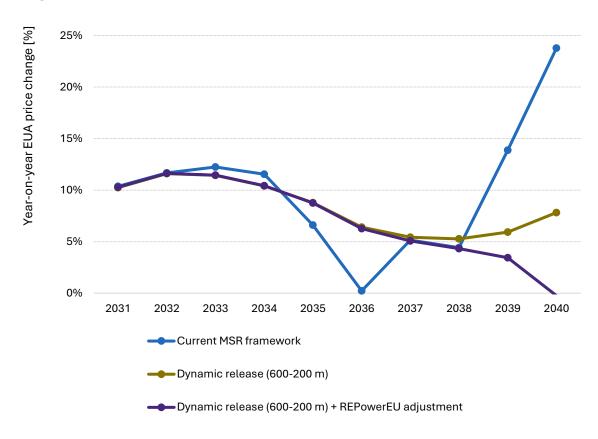


Veyt modelling shows that a dynamic release function reduces year-on-year price volatility

#### Price path stability is dependent on MSR design



# The rate of annual price change stabilises without supply step-function



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