

Regulating Aviation

Let Europe be the first to create an effective climate policy for aviation

CORSIA is not good enough:

- Too late (starting 2021)
- Too short (till 2035)
- Too little (excluding global annual emissions till total amount in 2021)
- Too small (excluding non-CO2 greenhouse effects)
- False (claims to be climate neutral but is not at all)
- Unfair (violates human rights)
- Insufficient (not enough compensation projects available)
- Ineffective (compensation does not eliminate the greenhouse gas exhaust)
- Not feasible (biofuels are too expensive and not sufficiently available)
- Non-committal (voluntary)
- Not enforceable (no authorised supervision)
- Without sanctions (nothing happens if countries don't comply)

But worst of all:

- It does not limit the growth (expected to be 7,8 times the current number of flight miles in 2050)

So greenhouse gas emissions for aviation will absorb the total global carbon budget by 2070

Alternative fuels are no solution

- Not enough waste oil available
- Palm oil creates more climate damage than it solves
- Food crops are needed to feed the people. Burning them causes hunger
- Not enough land available for switching to rape seed oil
- Not enough feedstocks available (10%)
- Genetically modified algae are a threat to biodiversity
- Biofuels can't replace more than 50% of fossil kerosene
- Synthetic fuel from Carbon Capture is just re-emitting carbon dioxide we want to get rid of and uses half of the available amount of sustainable energy
- Too expensive (while airlines have very small margins)
- Greenhouse gas emissions will keep rising at the same rate aviation grows while using biofuels

Technical solutions insufficient

- Fuel efficiency can only be improved by 1% per year
- Airplanes last 20 years, so it takes too long before all planes are replaced by more efficient ones
- No large scale commercial available electrical airplanes before 2040
- Even then they can not fly longer than 1.5 hours
- With just a few (19) passengers

Taxes hardly reduce emissions

- Swedish ticket tax of 6 to 39 euro per ticket reduces carbon dioxide emissions by 2% (non-CO2 excluded)
- 200% ticket-tax
 - plus \$1000/ton CO₂ carbon pricing
 - plus maximal technological improvements
 - plus 90% subsidising of sustainable fuels
 - and \$200 billion high speed rail investmentswon't keep the climate impact of aviation within the Paris climate agreement limits

Emission Trade Insufficient

- Non CO2 effects (at least 50%!) not included
- Too many emission rights (85%) handed out for free EVERY YEAR
- Cap is declining at a far too low rate (2.2% per year)
- Cap starts declining far too late (from 2021)
- Carbon price is far too low to be effective (now € 11/ton)

Limiting the number of flights

- The only effective climate policy for aviation:
- Set a declining cap on the annually allowed number of flights per country and divide them over the countries airports
- Alternative: limiting the amount of airplane flight passenger miles combined with limiting the amount of air freight kilograms times air transport distance which is very difficult to regulate

System changes required

- Change the European Slot Regulation in order to be able to
 - Limit of the number of slots available per country
 - Use slot coordination on airports without capacity problems
- Change the European Regulation for operating restrictions at Union airports in order to be able to
 - Limit the number of flights because of the climate
 - Without consulting interested parties
 - Without having to compare the cost-effectiveness of all possible measurements for every single airport
 - Also on smaller airports than those with 50.000 flight movements per year
- Change the European Guideline Airport Charges
 - Undo the 5 million passengers per year requirement
 - So that all airports will charge higher prices for the most polluting and noisy planes

Other suggestions from Dutch groups

- Follow the money: publish who is paying for those cheap tickets and who gains the profit
- Demand stricter European State Aid Rules for airport investments in cooperation with Transport and Environment
- More focus on health risks of aviation emissions (both sound and particles)
- More attention for hazardous emissions such as ultra fine particles
- European agreement for kerosine excise
- European agreement for VAT on tickets
- Carbon price for aviation (€ 80 /ton)
- Investing the yields of these taxes in intra European high speed trains and rail infrastructure
- Make it possible that countries decide themselves how to regulate airports instead of forbidding restrictions by European (ICAO) rules