



**Submission to EU Commission**

**On Consultation on the policy options for market-based measures to  
reduce the climate change impact from international aviation**

Dear Sirs,

Please find our answers to your questions below.

Kind regards

A handwritten signature in black ink, appearing to read 'Dr. Kolmetz', written in a cursive style.

Dr. Sven Kolmetz  
Co-Vice chair Project Developer Forum

**Project Developer Forum Ltd.**  
100 New Bridge Street  
UK London EC4V 6JA

Europe: +44 1225 816877  
Asia: +65 6578 9286  
office@pd-forum.net  
www.pd-forum.net

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## F. Questions for consultation

### F.1. ICAO Framework for Market-Based Measures and Global MBM scheme

1) What should be the major considerations to assess the four different geographical scope options for the ICAO Framework listed above? [Max. 1000 characters]

*By 2020 at least 90% of all aviation emissions shall be covered as otherwise some airlines would have an advantage depending on their flight routes. Moreover, perverse incentives could be created if alternative routes outside national airspace are prioritised by airlines. Before 2020 there could be a phase-in starting with the e.g. 10 biggest emitters covering 50% (case 1 or case 3 of the HGCC paper on co2 emission coverage)*

2) Which elements of the "Roadmap for a Global MBM" do you consider a priority, and what would be the optimal timeline for implementation? [Max. 1000 characters]

*Priority shall be given to e) the quality criteria for offsets because offsets will have an important role for aviation industry due to the limited saving potential and offset credits must be available before the global MBM starts to allow for cost-effective offsetting. Only offsets generated under international control such as CER or ERU track 2 shall be allowed for compliance purposes while further qualitative restrictions can be defined e.g. regarding technology. Ideally the MBM starts in 2016 or 2017, while a trial period may start in 2015 already. There is no time too lose, so the earlier, the better. Second priority should be given to the timetable and legal mechanism while the other elements must be resolved simultaneously to be available when the mechanism will start.*

3) What essential requirements should be taken into account for the development of a common set of monitoring, reporting, and verification standards for measuring greenhouse gas emissions from international aviation? [Max. 1000 characters]

*Relevant, transparent, accurate, complete and consistent reporting AND Independent Third Party Assessment under international control. The MRV shall be based on international standards such as ISO 14064-1 and -3 and ISO14065.*

### F.2. Simplifications for small aircraft operators

Certain flights are exempt from the Community system. According to paragraph (j) of Annex I to the EU ETS Directive, certain flights operated by a commercial air transport operator are exempt from the provisions of the EU ETS (*de minimis* exemption). The conditions are the following:

- the operator is a commercial air transport operator; AND
- the operator either operated less than 243 flights per three consecutive period of four months (Jan-Apr, May-Aug, Sep-Dec) or emitted less than 10,000 tonnes of CO<sub>2</sub> annually.

This exemption applies to commercial air transport operators. Non-commercial aircraft operators below the threshold are covered by the EU ETS. Small emitters can take advantage of simplified procedures to monitor their emissions. Recently, the threshold to make use of the simplified procedures has been increased to 25000 tonnes of emissions per year.

1) What could further decrease the compliance cost (cost for monitoring, reporting, verification, and registry) significantly for small aircraft operators? [Please rank the options below.

Rank 1 - greatest cost decrease, 4 - no cost decrease]

4 Management companies could be attributed to Member States for administration;

1 No additional verification would be required in case of using the Eurocontrol Support Facility;

2 All Member States would provide IT-tools for reporting;

3 Simplified requirements to open an aircraft operator holding account in the Union Registry for small emitters (only for receiving and surrendering allowances).

2) Would you be in favour of exempting non-commercial aircraft operators altogether from the scope of EU ETS similar to the *de minimis* exemption of commercial operators? [Possible answers: "Yes"/"No"/"Cannot decide"]

No

3) Which consideration is the most important when choosing a *de minimis* threshold for small aircraft operators? [Possible answers: "overall environmental effectiveness of the system", "administrative effort for operators", "other"]

*Overall environmental effectiveness as all operators should be treated similar without creating loopholes or space for gaming for small operators.*