

Dear all,

We, DC Aviation GmbH, representing one of the major and worldwide operating business aviation companies in Europe, want to participate on the Clima Consultation concerning the aviation sector. Please find our opinion to the questions for consultation below:

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

- 1) To fulfill the goals stopping or slowing the global warming the ICAO Council should consider that the coverage should be as wide as possible. Only including national flights or flights, overflying the national airspace will have the result that the efforts for the countries, which commit to the framework, or the companies will be increases and the climate changes policy will not accomplish the goals.
- 2) The priority is as follows:
  - 1) Assessment of, and agreement to, the most effective means of allocating emissions limits/responsibilities in a global MBM (until the end of the year)
  - 2) Agreement to establish a harmonized monitoring, reporting and verification system for a global MBM (until the end of 2014)
  - 3) Agreement to a timetable and legal mechanisms for the introduction of a global MBM (until the end of 2014)
- 3) Monitoring – the standard density should be adopt as the only one way to convert the uplifted amount into mass. The most of the airports worldwide don't show the real density anyway. For companies with very divers fleet it is almost impossible for apply the same rules for every aircraft of the fleet.  
Reporting – the same platform and software should be used worldwide. It ensures the same standards for companies based in different countries and reporting to different local authorities. Also the local authorities, where the reports will be submitted and approved should fulfill the same criteria regarding documentation and the time period.  
Verifying - one framework for verifiers worldwide

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

- 1)
  - 1- No additional verification would be required in case of using the Eurocontrol Support Facility
  - 2 - Simplified requirements to open an aircraft operator holding account in the Union Registry for small emitters (only for receiving and surrendering allowances)
  - 3 - All Member States would provide IT-tools for reporting;
  - 4- Management companies could be attributed to Member States for administration
- 2) Yes – most of the private operated aircrafts are only a single A/C and there is just the captain. There are huge efforts needed to comply without paying penalties for those operator. Most of them have possibly not the know how to monitor and report the emissions anyway.
- 3) administrative effort for operators – as a business aviation company we are producing CO2 emission on the boarder to the small emitters. This means for us that we need to fulfill all the criteria complying to the EU-ETS, but the added value for the environment is minimal. If we would emit less than 25000 tons of CO2 instead 26000 we could use the small emitters tools and use the simplify procedures. Another point is that as mentioned we are on the boarder and the emission amounts may vary over and under the boarders, which means that we need to change our monitoring concepts constantly.

Thank you very much for the chance participating on this consultation.