

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]

In order to access the four different geographical scope options for the ICAO Framework, several considerations have to be kept in mind:

- **COMPETITIVITY** and level playing field between countries and operators so as to preserve operator's competitiveness, in a context of increased international competition. A non-balanced measure could quickly put in danger the economic health of operators.
- **APPLICABILITY** and consistency of the measure with the international treaties and bilateral agreements
- **RELEVANCE** of the scope selected from an environmental and economic point of view
- **CLARITY** of the selected scope so as to guarantee its understanding from each state and spread its application widely.
- **SIMPLICITY** of the system established so as to limit the cost of compliance for operators.
- **SIGNIFICANCE** of the scope of coverage of CO₂ emissions.

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]

For the FNAM, priority elements of the « Roadmap for a global MBM » are proposals:

- b) "Agreement to the effective and non-distortionary means of taking the special circumstances and respective capabilities of developing states into account within the design of a global MBM" because it will allow operators of developing countries to fully integrate the global MBM and to comply with the regulations.
- a) "Assessment of, and agreement to, the most effective means of allocating emissions limits/responsibilities in a global MBM" because a shared global agreement is necessary in order to guarantee the success and the spread of the MBM.
- f) "Agreement to a timetable and legal mechanisms for the introduction of a global MBM."

If we want a strong and shared global MBM, we can't consider a reasonable calendar before January 2015. Indeed, some developing countries and small aircraft operators are far away from establishment of a MBM and need time to comply with the regulation.

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]

For the development of a common set of monitoring, reporting, and verification standards for measuring greenhouse gas emissions from international aviation, some requirements are necessary:

- **MINIMIZE** management costs
- **SIMPLICITY** of the reporting and monitoring systems and **NON-DUPLICATION** with other regulatory and mandatory reporting
- **HARMONIZATION** of verification standards between states

F.2. Simplifications for small aircraft operators

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]

- Management companies could be attributed to Member States for administration; **Rank 3**
- No additional verification would be required in case of using the Eurocontrol Support Facility; **Rank 2**
- All Member States would provide IT-tools for reporting; **Rank 4**
- Simplified requirements to open an aircraft operator holding account in the Union Registry for small emitters (only for receiving and surrendering allowances). **Rank 1**

2) Would you be in favor 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"]

YES

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"] Please, explain your answer [max 1000 characters].

The most important consideration when choosing a *de minimis* threshold for small aircraft operators is to have a "overall environmental effectiveness of the system".

Indeed, any system that involves higher administrative efforts than the environmental benefits proves to be counterproductive.