

Dear Sirs and Madams,

please find my contribution to your consultation in the following lines:

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]

As in the draft assembly resolution the airspace approach is already fixed, no need to comment on this. In general, the more CO2 is included the better.

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]

All elements a) to f) are important elements. Priority should be given to easiness of the allocation rules. We have seen in Europe in the first two trading periods of the ETS that too many allocation rules make the system incredibly complex and administration expensive. The administration should be done by environment authorities, not transport or financial authorities. It should be tried to include non CO2 climate effects into the scheme.

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]

The MRV system should not be too simple, the incentives to operate flights emission efficient/ to reduce emissions by operation should be maintained. Real fuel consumption is essential, but it should be allowed to calculate it by fuel bills instead of flight-by-flight measurement.

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; 3

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

- All Member States would provide IT-tools for reporting; 4

- Simplified requirements to open an aircraft operator holding account in the Union Registry for small emitters (only for receiving and surrendering allowances). 2

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

No! It's neither fair nor justified to exempt a group of people who are rich enough to be able to afford a business jet. They should pay for their climate costs, too, especially as a business jet is more or less the least energy efficient means to travel! The administrative effort is

relatively high, but to exempt them from the scheme is like throwing the baby out with the bath water.

3) Which consideration is the most important when choosing a de minimisthreshold for small aircraft operators? [Possible answers:

"overall environmental effectiveness of the system", "administrative effort for operators", "other"]

Please, explain your answer [max 1000 characters]

other: social fairness, see answer to question 2. Rich people with business jets should pay for their climate threatening travelling in very energy inefficent transport means.

Second priority should be environmental effectiveness of the system: as many CO2 emissions as possible should be included.

Best regards,

Dr. Olaf Hölzer-Schopohl