



The International Air Cargo Association

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1) What should be the major considerations to assess the four different geographical scope options for the ICAO Framework listed above?

ICAO's priority must be the agreement of a single, simple and sustainable global measure. This is the only appropriate means for the comprehensive, non-discriminatory coverage of civil aviation CO2 emissions. Any geographical framework for MBMs must be temporary and applied in a non-discriminatory manner which is respectful of international law. A key issue with the inclusion of international aviation in the ETS was its encroachment upon the sovereign authority of each State over its own airspace.

This is of particular relevance to options 3 and 4, which would cover 100% of emissions. Such a framework would require very careful consideration and the support of all affected States.

Any framework for MBMs must be in line with, and build on, the principles outlined in the annex to ICAO Assembly Resolution A37-19.

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

In line with our response to question 1, we believe all elements of the Roadmap to be of critical importance for the successful implementation of a global MBM.

In order for a global MBM to be proportionate and appropriate, emissions limits and responsibilities must be allocated so as to ensure cost-efficiency and preserve fair competition. Responsibilities must not be so onerous as to place an unfeasible burden on carriers, and should be calculated taking account of carriers' share of overall emissions and projected growth. Moreover, the MBM must be just one part of a broader effort to address aviation emissions, and take into account other activities including technological improvement.

Administration of the MBM should be focused on a clearly-defined structure, incorporating national authorities and ICAO, with common standards for monitoring, reporting and verification. Furthermore, revenues should not be used for general expenditure, but be devoted to environmental improvement activities.

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?

Simplicity and flexibility are essential in determining the monitoring, reporting and verification standards. Not all methodologies may be suitable for all carriers, so scalable reporting methodologies, based on a basic common framework, would be appropriate in order to fit the abilities of different-sized operators.