

Berlin, 13.09.2013

**Submission on behalf of Verkehrsclub Deutschland e.V.,  
Registriernummer: 20396927547-17**

Thank you for the opportunity to contribute to this consultation. We regret that the only way to contribute to this process is to submit a response in English and would like to ask the Commission to provide consultations in other languages than English in the future. The representativeness of such an exercise is unfortunately rather limited if English is the only language option provided.

Question:

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

Answer:

We strongly criticise that the Commission has not included the 50/50 option amongst the options mentioned and the EU failed to promote it at ICAO. From an environmental point of view even the 50/50 option is insufficient, as it would not cover 100% of the CO2 emissions from aviation compared to the current scope of EU ETS. The other options outlined in the paper would cover even less scope of the EU ETS.

The most important consideration in this context should be environmental effectiveness at EU and global level. A 50/50 approach if copied worldwide would cover 100% of emissions; an airspace approach only 22%.

At the time aviation was included into the EU ETS Verkehrsclub Deutschland criticised the chosen policy options as environmentally insufficient to tackle the environmental problems caused by growing aviation emissions. Therefore options that would further weaken the current scope of the EU ETS such as options based on airspace/regional airspace are unacceptable because of the vastly reduced geographical coverage and CO2 reductions.

It is important that the Commission's impact assessment of the environmental coverage of the various options shows the tons of CO2 reduced for each option not only for the base year (2014) but also for 2020 and 2025 given the large disparity in effectiveness between the options that will develop over time. It must also show the climate warming (RF)/temperature response impacts over similar periods.

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Question:

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

Answer:

Priority 1. It is essential that the 38<sup>th</sup> ICAO Assembly formally agree to apply a global market based measure to international aviation. International action to reduce aviation emissions has been much too slow in the past.

Priority 2. We think an international agreement should not be based on offsetting because it is not an environmentally viable solution. If the offsets are of low quality, climate impacts actually get worse, which is contrary to the purpose of tackling the climate impact of aviation.

Priority 3. In addition to the points mentioned above ICAO action should also address the non CO2 climate effects as well.

Yours sincerely,

Michael Ziesak, Bundesvorsitzender VCD

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