

Naturefriends International (NFI) Response
Transparency register: 88140777010-24
Consultation on the policy options for market-based measures to reduce the climate change impact from international aviation
13 September 2013

In cooperation with "Transport and Environment (T&E)"

F. Questions for consultation

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]

NFI believes that the geographic scope options for the ICAO Framework should be considered in light of the EU ETS. Although the Commission excluded the 50/50 option, NFI thinks that the EU should promote the 50/50 option, which we find as the most environmental effective option in times of rapid growing CO₂ emissions from international aviation. The 50/50 option would cover 100% of emissions if applied worldwide. NFI strongly argues that the reduced geographical coverage (such as options based on national airspace/regional airspace) would not result in achieving desired incentives to operators to reduce their 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]

It is a priority that the 38th ICAO Assembly agrees to apply a global MBM to international aviation. The EU should promote and insist for an EU ETS based approach. The civil society should be involved in the processes and have the access to documents and have the sufficient instruments to contribute. It needs to be recognised in ICAO that offsetting is not a long term solution as it does not lead to emissions reductions in the aviation sector but compensates these emissions throughout investment in reduction projects elsewhere.

EU needs to ensure that ICAO addresses the following issues in relation to the use of offsets: quality restrictions should be placed on CDM offset credits to ensure that only CERs that come from projects with high environmental quality can be used; offset credits from JI should not be eligible; NMM credits should only be eligible if they are verified to be real, permanent and additional; offset credits from the voluntary market should not be eligible and offset credits from bilateral offsetting mechanisms should not be eligible.