

Responses to "Consultation on market-based measures to reduce the climate change impact from international aviation" from organisations registered in the EU Transparency Register and from public authorities"

Registered Organisations

1. Avocet Risk Management Limited	23. Association of European Airlines
2. FuelsEurope	24. Air Berlin PLC & Co. Luftverkehrs KG
3. Naturschutzbund Deutschland (NABU) e.V.	25. Quercus - Associação Nacional de Conservação da Natureza
4. Energy Norway	26. Austrian Federal Economic Chamber
5. Carbon Market Watch	27. Thomas Cook Group
6. Community of European Railway and Infrastructure Companies	28. WWF European Policy Programme
7. Zero - Associação Sistema Terrestre Sustentável	29. Fern
8. AVIONS DE TRANSPORT REGIONAL	30. Amadeus IT Group S.A.
9. Airlines for America	31. Bundesverband der Deutschen Luftverkehrswirtschaft e. V.
10. International Air Carrier Association	32. Bürgerinitiative gegen Fluglärm Raunheim
11. Global Shippers Forum	33. International Emissions Trading Association
12. European Regions Airline Association	34. European Union Against Aircrafts Nuisances
13. International Airlines Group	35. Austrian Airlines
14. International Air Transport Association	36. Sandbag
15. European Biodiesel Board	37. EasyJet
16. Transport and Environment	38. Airlines for Europe
17. Air France	39. Total
18. GE Europe	40. European Low Fares Airline Association
19. Austrian Institute of Economic Research WIFO	41. Bürgerinitiative Südbadischer Flughafen Anrainer
20. KLM Royal Dutch Airlines	42. Bundesvereinigung gegen Fluglärm
21. Finnish Association for Nature Conservation	43. Climate Action Network Europe
22. European Express Association	

Public Authorities

44. Bayerisches Staatsministerium für Umwelt und Verbraucherschutz	48. Ministry of National Development, Hungary
45. Ministry of the Environment of the Czech Republic	49. Belgium: joint submission by the Federal and Regional transport and environment authorities
46. The Danish Government	50. The French authorities (Permanent Representation to the EU)
47. Finland/Ministry of Transport and Communications	

1.

Name of the individual or organisation
Avocet Risk Management Limited
Capacity in which the individual/organisation is completing Questionnaire
Private enterprise
Business Sector
Aviation Risk Management including aviation EU ETS compliance
If private enterprise
Yes - small enterprise
If your organisation is registered in the Transparency Register, please give your Registry ID number
132505820943-88
Please give your country of residence/establishment
United Kingdom
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
The Paris Agreement requires all anthropogenic emission sources to be addressed to reach a global peaking of greenhouse gas emissions (GHG) as soon as possible and to undertake rapid reductions thereafter. However, Carbon dioxide (CO ₂) emissions from international aviation are expected to grow by at least 250% from 2005 levels by 2050. Unlike EU ETS, the proposed ICAO GMBM is not a carbon emissions reduction scheme but a business as usual scheme employing carbon offsets to mitigate emissions in excess of baseline thresholds. If the ICAO proposals are to be effective then the GMBM must reduce carbon emissions rather than offset. The White House has calculated the societal cost of carbon emissions at \$36 per tonne. Little of this societal cost is incurred by the aviation industry whereas other industries have to contribute considerably. The fairest way of dealing with this is to impose an aviation fuel tax in addition to ICAO's offsetting proposal.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Carbon offsetting has been stealthily promoted by ICAO and IATA as the sole option to be put to the ICAO TGA. This is at odds with EU ETS and other regional emissions reduction schemes based on a cap and trade system that have successfully achieved positive results in reducing emissions. As far as Europe is concerned, ICAO's proposed GMBM scheme is unfit for purpose in all respects as not one of the proposals within the scheme can be positively benchmarked as exceeding the EU ETS aviation 'Equivalent Measures' criteria. If ICAO's proposals are not to fall considerably short of the EU's equivalent measures criteria it must be fully accountable, robustly enforced and totally transparent. GDP Phase in and route exemptions will do nothing to achieve a reduction in global warming and Chicago convention principles should override CBDR ideals if aviation emissions are to be constrained.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
International aviation should be included in EU ETS participating States' carbon budgets with immediate effect
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
First whether an agreement is reached at ICAO or not. If an ICAO GMBM scheme is agreed then it should be benchmarked against current aviation EU ETS 'Equivalent Measures' criteria. Any ICAO GMBM that falls short of that measure will weaken the EU ETS and create a market distortion between aviation and other industries.
Which options should be considered for the EU ETS for the period 2017-2020?
EU ETS full scope should be re-introduced from 2016 until at least 2020.
Which options should be considered beyond 2020?
An amended 'full scope' EU ETS including small emitters. 100% EUA/EUAA allowance auctioning (i.e. no free allocation of allowances post 2020) and a reduction in the aviation cap
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
We do not believe that any of the current ICAO GMBM proposals are equal to or exceed EU ETS equivalent

measures and therefore the ICAO proposals will be detrimental to environmental effectiveness and create distortion within the EU ETS. EU ETS is far from being a perfect scheme to deal with aviation emissions but for all its faults it is likely to be a much more effective and environmentally robust than ICAO's current GMBM proposals. The greatest flaw to aviation EU ETS has been failure of the EU to stick to its principles under international pressure and to effectively use enforcement measures for non-compliant aircraft operators. The fact that so many of ICAO's proposals concerning governance, reporting and application have not been defined, it is impossible to say which would enhance an amended aviation EU ETS, if any.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Small emitters should not continue to be exempted from EU ETS beyond 2020. Emissions per capita from small emitters far exceed those of commercial fare paying passengers who are often charged an EU ETS levy, even if most airlines are receiving free allowances covering the majority of their emissions (i.e. Ryanair and a number of US carriers). Whilst there are administrative costs, these can be and in many instances are currently outsourced by a number of commercial and non-commercial aircraft operators to professional EU ETS service providers.
Submit any other comments you may have.
We fully endorse MEPs action to return to full scope EU ETS in the event that a robust GMBM is not agreed at the ICAO GMBM. The EU has an obligation to work towards Paris Agreement principles and these must include aviation emissions regardless of the fact that they were deliberately omitted from the COP 21 agreement.

2.

Name of the individual or organisation
FuelsEurope
Capacity in which the individual/organisation is completing Questionnaire
Professional organisation
Please indicate the sectors your organisation represents
Refining, distribution and marketing of transport fuels (road, maritime and aviation)
Where is your company located?
Belgium
If your organisation is registered in the Transparency Register, please give your Register ID number:
26207914726-42
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
FuelsEurope is of the opinion that in order to reduce GHG emissions from transport activities, all actors of the aviation sector should contribute taking into account the availability of cost-effective GHG reduction efforts specific to their transport sub-sector.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
FuelsEurope expects that the 2016 ICAO Assembly will endorse the basket of measures approach, including energy efficiency, traffic optimization, bio-jet and a global MBM as a complementary tool to close the emission gap of the Carbon Neutral Growth 2020 (CNG2020) objective. This gap could arise when GHG reductions from technology, operational or infrastructure would not be sufficient to reach the CNG 2020 target.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
All sovereign entities not covered by ICAO regulations regarding international transport should be allowed to implement specific measures provided that they do not lead to market distortion for aviation industry.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
The review of the ETS after the 2016 ICAO Assembly should be oriented towards a cost-effective reduction of domestic aviation GHG reduction. . Greater certainty is required for in order to sufficiently hedge emissions exposure to 2020.
Which options should be considered for the EU ETS for the period 2017-2020?
The current EU ETS for domestic aviation should be extended until at least 2020.
Which options should be considered beyond 2020?

GHG reductions in the EU aviation as results from technology, operational and infrastructure improvements and bio-jet should be maintained eligible for credits. Those could be used as compliance mechanism for the domestic aviation sector.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
We support the exemption of non-commercial aircraft operators emitting less than 1000 tons of CO2 per year.
Submit any other comments you may have.
We would like to call for a stronger support of research and development for all aviation fuels in order to contribute at the maximum to a reduction in GHG emissions from aviation. Alternative low carbon fuels for the aviation sector should be included in the range of technologies eligible to access the Innovation Fund.

3.

Name of the individual or organisation
Naturschutzbund Deutschland (NABU) e.V.
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus:
Nature and Biodiversity Conservation
If your organisation is registered in the Transparency Register, please give your Register ID number:
0285583802-96
Please give your country of residence/establishment
Germany
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
<ul style="list-style-type: none"> The proposed 2020 carbon neutrality goal under ICAO must be increased in line with the long-term goals agreed in Paris; ICAO policies must not in any way limit more ambitious policies by states and regions; Reductions should be achieved in the sector itself: Emissions from flights that start or end in the EU must not be compensated with carbon offsets from other sectors; Aviation must raise revenue to contribute to climate finance; The CO2 emissions from aviation must be subject to a multiplier of at least two as the total climate impact of aviation is 2-5 times higher than its CO2 emissions alone; Since no global cap on aviation emissions is currently in place, the ETS must start operating again in its full scope in 2017.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<ul style="list-style-type: none"> A substantial increase of the proposed 2020 carbon neutrality goal in line with the long-term goals agreed in Paris. A provision encouraging states to take additional measures and greater ambition. Ambitious in-sector reduction targets: No compensation through carbon offsets from other sectors. A multiplier of at least two on CO2 emissions from aviation, as the total climate impact of aviation is 2-5 times higher than its CO2 emissions alone. Proper accounting of all warming effects including for alternative fuels.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
An ICAO agreement should be seen as a floor for ambition, not a ceiling. Nothing in the Assembly Resolution should prohibit states to implement more ambitious measures. States must be able and encouraged to establish their own more ambitious emissions caps for the aviation sector. Since an ICAO agreement will only cover international travel (departing in one state, arriving in another), countries must establish caps for domestic aviation emissions in line with the long-term goals agreed in Paris.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Combined ICAO and EU action must ensure emissions reductions in line with the long-term goals agreed in Paris. The EU must set aviation sector targets in line with Paris if ICAO establishes a GMBM: <ul style="list-style-type: none"> that is not legally binding; without a higher target than 2020 carbon neutrality;

- weak accounting rules;
- based on offsetting and not on in-sector reductions.

The ETS must start operating again in its full scope in 2017. From 2021 the ETS must cover all inner-EU flights and 50% of all international flights:

- Aviation must be subject to the same 2030 target as all other ETS sectors;
- Emissions from flights that start or end in the EU must not be offset with carbon credits from other sectors;
- No free ETS allowances to the aviation sector from 2017 onwards. Auctioning revenues must be earmarked for the Green Climate Fund;
- The ETS target must be brought in line with the Paris Agreement. Therefore 2030 ETS target must be raised significantly.

[Which options should be considered for the EU ETS for the period 2017-2020?](#)

The Stop the Clock provision was implemented in order to grant ICAO more time to negotiate a GMBM. Since no GMBM is currently in place, the ETS must start operating again in its full scope in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by the Paris outcome.

[Which options should be considered beyond 2020?](#)

From 2021 onwards, the ETS must cover all inner-EU flights and 50% of all outgoing and 50% of all incoming international flights:

- Aviation must be subject to the same 2030 target as the other ETS sectors;
- No free ETS allowances must be given to the aviation sector from 2017 onwards and its auctioning revenues must be earmarked for the Green Climate Fund;
- Emissions from flights that start and/or end in the EU must not be compensated with international carbon offsets;
- The ETS target must be brought in line with the Paris Agreement. Therefore the currently proposed 2030 ETS target of minus 43% below 2005 levels must be raised significantly.

[According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS \(...\), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness \(e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.\)?](#)

The Stop the Clock provision was implemented in order to grant ICAO more time to negotiate a GMBM. Since no GMBM is currently in place, the ETS must start operating again in its full scope in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by the Paris outcome.

From 2021 onwards, the ETS must cover all inner-EU flights and 50% of all outgoing and 50% of all incoming international flights:

- Aviation must be subject to the same 2030 target as the other ETS sectors;
- No free ETS allowances must be given to the aviation sector from 2017 onwards and its auctioning revenues must be earmarked for the Green Climate Fund;
- Emissions from flights that start and/or end in the EU must not be compensated with international carbon offsets;
- The ETS target must be brought in line with the Paris Agreement. Therefore the currently proposed 2030 ETS target of minus 43% below 2005 levels must be raised significantly.

[Should small non-commercial aircraft operators \(emitting less than 1000 tonnes of CO2 per year\) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?](#)

Fuel taxation and/or VAT is a more effective measure for small operators since there are fewer or no legal barriers to such policies for small non-commercial aircraft.

[Submit any other comments you may have.](#)

ICAO significantly lacks transparency and therefore breaches the Aarhus convention. Transparency has to be increased substantially to ensure any agreement reached by ICAO reflects the needs and voices of civil society. The recently agreed ICAO CO2 standard fails to reduce emissions from the sector. The EU must provide complementary measures - fuel taxation, VAT, improved efficiency standards etc.

Currently the EU does not speak with a unified voice at ICAO meetings. This significantly weakens the EU's impact and undermines a push for strong climate action in the aviation sector. The EU should negotiate at ICAO in a unified single voice that advocates for strong climate action in line with the Paris Agreement.

Handing out 85% free ETS allowances, perpetuating the fuel tax exemption and VAT exemption for aviation while charging busses and trains disproportionately favors a more climate damaging mode of transportation.

4.

Name of the individual or organisation
Energy Norway
Capacity in which the individual/organisation is completing Questionnaire
Professional organisation
Please indicate the sectors your organisation represent
Renewable Energy
If your organisation is registered in the Transparency Register, please give your Register ID number:
50098025830-01
Please give your country of residence/establishment
Norway
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
Stabilisation and reduction of emissions in line with 2050-targets.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Cap on CO2 emissions and market based instrument for mitigation.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Ambition level in line with 2050 targets and markets based instrument.
Which options should be considered for the EU ETS for the period 2017-2020?
Inclusion of emissions
Submit any other comments you may have.
All sectors should be subject to a cap on emissions.

5.

Name of the individual or organisation
Carbon Market Watch
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus:
Carbon Markets
If your organisation is registered in the Transparency Register, please give your Register ID number:
75365248559-90
Please give your country of residence/establishment
Austria
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
The international CNG2020 goal should be legally binding & enforced from the GMBM's 2021 start. The cap should be progressively tightened & further measures implemented to ensure emissions are reduced in the aviation sector consistent with a 1.5°C pathway: <ul style="list-style-type: none">• ICAO policies must not in any way limit more ambitious policies by states or regions• CO2 emissions from aviation must be subject to a multiplier of ≥ 2• Aviation must contribute to climate finance At EU level: <ul style="list-style-type: none">• Aviation emissions should be reduced in the aviation sector• The EU should reject international credits as reductions achieved should be domestic• Restart the clock in 2017 Both: <ul style="list-style-type: none">• Cover all aviation emissions, not just those above 2020 levels• Promote in-sector reductions ie by incentivizing technology & performance improvements & demand management• Routes between developed countries should be subject to more ambitious measures

Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?

A legally binding agreement that comes into force in 2021, should demonstrate strong political support from states, with sufficient detail to give confidence that an effective GMBM will work. It should include:

- Recognition that CNG2020 is an (insufficient) starting point towards contributing to the Paris Agreement 1.5°C goal and GMBM & other measures' ambition must be ratcheted up every 3 years
- All air travel from one country to another
- A provision encouraging states to take additional measures & increase ambition
- Strict, mandatory criteria for emission units with a commitment to common social and environmental standards, including a negative list of ineligible project types
- No undermining of the CNG2020 through exemptions
- A ≥ 2 multiplier on CO₂ emissions from aviation, as the total climate impact of aviation is 2-5x higher than its CO₂ emissions alone
- Proper accounting and MRV rules for alternative fuels and offset credits to avoid double counting

In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?

- The GMBM should be seen as a floor for ambition, not a ceiling. States or groups of states should be encouraged to use the GMBM to increase ambition through, e.g. discounting
- Nothing in the Assembly Resolution should prohibit states implementing more ambitious measures (e.g. addressing non-CO₂ emissions & emissions below CNG2020, stricter technical & operational standards)
- Additional policies should be considered by ICAO and/or states e.g. taxation, phase outs, technological standards, operational measures
- States should be allowed to set higher quality criteria for credits used to offset emissions from flights using their airports
- A single global MRV system would provide additional administrative simplicity for operators. However it will only be effective if the quality of the MRV is high. ICAO MRV standards should therefore be of the highest environmental integrity
- ICAO should work with UNFCCC to exclude double counting efforts in different fora

Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?

Combined ICAO & EU action must ensure aviation emissions reductions are in line with 1.5°C. The EU must take significant additional action & set aviation sector targets if the GMBM:

- Is not universally legally binding,
- Sets CNG2020 without a mechanism to increase ambition every 3 years,
- Has exemptions to CNG2020,
- Weak accounting rules.

Stop the Clock was implemented to give ICAO time to negotiate a GMBM. The GMBM is not in place so ETS must restart in its full scope in 2017 (as stipulated by Reg 421/2014). From 2021, the ETS must cover all intra-EU flights & 50% of all inbound and outbound international flights. Aviation must be subject to the same 2030 target as the other ETS sectors:

- No free ETS allowances must be given to the aviation sector from 2017 onwards; auctioning revenues must be earmarked for the Green Climate Fund
- The ETS target must become in line with the 1.5C goal: the proposed 2030 ETS target of -43% below 2005 levels needs to be raised significantly

Which options should be considered for the EU ETS for the period 2017-2020?

Reg 421/2014 stipulates that from January 1 2017, the EU ETS should cover all emissions from international flights into or out of the EU. In the absence of other emissions trading systems for international aviation, or other equivalent measures, during this period this provision should remain in force. No free ETS allowances should be given to the aviation sector from 2017 on; auctioning revenues must be earmarked for the Green Climate Fund.

Which options should be considered beyond 2020?

- The EU must be more ambitious than CNG2020: the ETS target must be consistent with 1.5°C. Aviation must be subject to the same 2030 target as other ETS sectors; the currently proposed 2030 ETS target needs to be raised significantly
- The ETS must be retained for intra-EU routes to avoid undermining EU 2030 objectives & avoid market distortions between transport modes. Reforms must include full auctioning, be subject to the linear reduction factor & addressing non-CO₂ effects
- EU ETS must cover all intra-EU flights & 50% of all outgoing & 50% of all incoming international flights & any emissions not covered by the GMBM (eg through exemptions) to ensure the Paris 1.5°C ambition is met
- Appropriate measures should be put in place to avoid double-counting
- 100% of aviation allowances should be auctioned from 2017 on and revenues should be earmarked for the Green Climate Fund

<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>The ETS must restart with full force in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by the Paris outcome. From 2021 onwards, the ETS must cover all inner-EU flights and 50% of all outgoing and 50% of all incoming international flights. Aviation must be subject to the same 2030 target as the other ETS sectors:</p> <ul style="list-style-type: none"> • No free ETS allowances must be given to the aviation sector from 2017 onwards; auctioning revenues must be earmarked for the Green Climate Fund. • Emissions from flights that start and/or end in the EU must not be compensated with international carbon offsets in order to avoid market distortions • ETS target must be consistent with 1.5°C; the currently proposed 2030 ETS target of minus 43% below 2005 levels needs to be raised significantly • The EU should aim to take part in a single MRV scheme proposed by ICAO provided that it has integrity equal to that for EU ETS. The EU should push for an approach based on the EU ETS
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO₂ per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>Fuel taxation and/or VAT is a more effective measure for small operators since there are fewer or no legal barriers to such policies for small non-commercial aircraft. Where there are legal ways to do so, the EU should consider measures to regulate efficiencies of aircraft and policies to speed the scrapping of inefficient aircraft designs to encourage the use of more efficient designs.</p>
<p>Submit any other comments you may have.</p>
<p>Paris' 1.5°C goal will require drastic emissions reductions by 2050. ICAO's CNG2020 target is a first step, but must be increased greatly every 3 years to reach 1.5°C. Emissions from any exemptions made in the GMBM need to be covered elsewhere. Credit quality is also important: credits should represent real emissions reductions, contribute to the sustainable development of the host country and do social or environmental harm. Certain project types are known as problematic & should be placed on an ICAO negative list. Avoiding double claiming will require ICAO accounting rules to be in line with existing & future multi-laterally agreed practices. The GMBM must be seen to function well: current lack of transparency will ensure there is no confidence in the GMBM. The public should have access to information, including on quantity & types of credits used & be able to present inputs to the GMBM governing body, which should be guided by technical experts with no conflicts of interest</p>

5.

<p>Name of the individual or organisation</p>
<p>Community of European Railway and Infrastructure Companies (CER)</p>
<p>Capacity in which the individual/organisation is completing Questionnaire</p>
<p>Professional organisation</p>
<p>Please indicate the sectors your organisation represent</p>
<p>Railway operators and railway infrastructure companies</p>
<p>Where is your company located?</p>
<p>Belgium</p>
<p>If your organisation is registered in the Transparency Register, please give your Register ID number:</p>
<p>7574621118-27</p>
<p>Please give your country of residence/establishment</p>
<p>Belgium</p>
<p>Please indicate your preference for the publication of your response on the Commission's website</p>
<p>Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication</p>
<p>Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?</p>
<p>Momentum gained during the international climate negotiations should be continued after the Paris Agreement: implement more ambitious policy measures both at global and EU level. All sectors need to contribute in a fair manner to the greenhouse gas emission reductions, including international aviation. Aviation reductions should be driven by efforts at ICAO level as well as EU level. As the EU has committed to achieving domestic emission reductions, EU policies should reject the use of international credits. All aviation emissions should be covered. Ambition should soon be increased in line with the 1.5 degrees goal agreed in</p>

Paris.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Clear commitment from ICAO member states and sufficient detail to provide confidence that an effective GMBM, with a binding goal of Carbon Neutral Growth 2020 (CNG2020), will be operational by 2020. This should not restrict any greater ambition by particular countries.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
GMBM should not limit more ambitious tools to reduce aviation emissions. Countries as a group or on a bilateral basis should be able and encouraged to use the GMBM mechanism to increase ambition. The Assembly Resolution in principle should not prohibit countries to implement more ambitious measures such as addressing non-CO2 emissions, addressing emissions below CNG2020 or stricter standards. Where possible, complementary policies should be considered: taxation, technological standards, operational measures etc.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
The original EU provisions should be applied also to flights into or out of the EU and a legislative proposal should correct the existing weakness of ETS rules on the aviation sector. See Question 6 "Which options should be considered beyond 2020?".
Which options should be considered for the EU ETS for the period 2017-2020?
According to the ETS Directive, in 2017 the ETS will cover all emissions from international flights from or to the EU, in the absence of other market based measures for international aviation. This provision should remain untouched.
Which options should be considered beyond 2020?
Within the ETS, aviation should have to buy all its allowances just like most other sectors. Combined action of ICAO and EU could be explored. In aviation, only 15% of allowances are auctioned over the 2013-2020 period and the remaining 85% given for free. This distorts competition between high-speed rail and short-haul aviation. The ETS should be reformed to have full auctioning for aviation. International credits should be avoided beyond 2020. The aim of market-based measures is to reduce emissions but experience has shown that offsetting does not always work as intended to effectively reduce emission reductions.
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
Auctioning shares should be increased to 100% and aircraft operators should not be allowed to use international offsets to avoid market distortions. See Question 6 "Which options should be considered beyond 2020?".
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
The polluter-pays principle should apply. All operators should pay for their emissions. This could be done by removing exemptions in the ETS. Additional measures could be introduced to reduce the administrative burden. An alternative approach could be fuel taxation.
Submit any other comments you may have.
Additional policy messages: 1. Any move of intra-EU aviation from the ETS to the GMBM should only happen once the GMBM is a strong and effective system. 2. Even if the GMMB is equally effective for the environment, it might be reasonable to maintain the intra-EU ETS as a system based on EU law for any future improvements in carbon pricing for aviation emissions. The carbon price for intra-EU aviation in any emissions-reduction system should have the ETS price as a floor. 3. Complementary measures such as fuel taxation could be introduced in the EU.

7.

Name of the individual or organisation
ZERO - ASSOCIAÇÃO SISTEMA TERRESTRE SUSTENTÁVEL
Capacity in which the individual/organisation is completing Questionnaire

Civil society organisation
Please indicate your main area of focus:
Energy and Climate
If your organisation is registered in the Transparency Register, please give your Register ID number:
150692021687-73
Please give your country of residence/establishment
Portugal
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
<p>The aviation sector is responsible for 3-5% of global greenhouse gas emissions. These are expected to triple by 2050 unless action is taken. Therefore:</p> <ul style="list-style-type: none"> • The proposed 2020 carbon neutrality goal under ICAO must be increased in line with the long-term goals agreed in Paris; • ICAO policies must not in any way limit more ambitious policies by states and regions; • Reductions should be achieved in the sector itself: Emissions from flights that start or end in the EU must not be compensated with carbon offsets from other sectors; • Aviation must raise revenue to contribute to climate finance; • The CO2 emissions from aviation must be subject to a multiplier of at least two as the total climate impact of aviation is 2-5 times higher than its CO2 emissions alone; • Since no global cap on aviation emissions is currently in place, the ETS must start operating again in its full scope in 2017.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<p>A legally binding agreement that comes into force in 2021 that includes:</p> <ul style="list-style-type: none"> • All air travel from one country to another. To ensure equity, routes between developed countries should be subject to more ambitious climate policies. • A substantial increase of the proposed 2020 carbon neutrality goal in line with the long-term goals agreed in Paris. • A provision encouraging states to take additional measures and greater ambition. • Ambitious in-sector reduction targets: No compensation through carbon offsets from other sectors. • A multiplier of at least two on CO2 emissions from aviation, as the total climate impact of aviation is 2-5 times higher than its CO2 emissions alone. • Proper accounting of all warming effects including for alternative fuels.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
<p>An ICAO agreement should be seen as a floor for ambition, not a ceiling. Nothing in the Assembly Resolution should prohibit states to implement more ambitious measures. States must be able and encouraged to establish their own more ambitious emissions caps for the aviation sector.</p> <p>Since an ICAO agreement will only cover international travel (departing in one state, arriving in another), countries must establish caps for domestic aviation emissions in line with the long-term goals agreed in Paris.</p>
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
<p>Combined ICAO and EU action must ensure emissions reductions in line with the long-term goals agreed in Paris. The EU must set aviation sector targets in line with Paris if ICAO establishes a GMBM:</p> <ul style="list-style-type: none"> • that is not legally binding; • without a higher target than 2020 carbon neutrality; • weak accounting rules; • based on offsetting and not on in-sector reductions. <p>The ETS must start operating again in its full scope in 2017. From 2021 the ETS must cover all inner-EU flights and 50% of all international flights:</p> <ul style="list-style-type: none"> • Aviation must be subject to the same 2030 target as all other ETS sectors; • Emissions from flights that start or end in the EU must not be offset with carbon credits from other sectors; • No free ETS allowances to the aviation sector from 2017 onwards. Auctioning revenues must be earmarked for the Green Climate Fund; • The ETS target must be brought in line with the Paris Agreement. Therefore 2030 ETS target must be raised significantly.
Which options should be considered for the EU ETS for the period 2017-2020?

<p>The Stop the Clock provision was implemented in order to grant ICAO more time to negotiate a GMBM. Since no GMBM is currently in place, the ETS must start operating again in its full scope in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by the Paris outcome.</p>
<p>Which options should be considered beyond 2020?</p>
<p>From 2021 onwards, the ETS must cover all inner-EU flights and 50% of all outgoing and 50% of all incoming international flights:</p> <ul style="list-style-type: none"> • Aviation must be subject to the same 2030 target as the other ETS sectors; • No free ETS allowances must be given to the aviation sector from 2017 onwards and its auctioning revenues must be earmarked for the Green Climate Fund; • Emissions from flights that start and/or end in the EU must not be compensated with international carbon offsets; • The ETS target must be brought in line with the Paris Agreement. Therefore the currently proposed 2030 ETS target of minus 43% below 2005 levels must be raised significantly.
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>The Stop the Clock provision was implemented in order to grant ICAO more time to negotiate a GMBM. Since no GMBM is currently in place, the ETS must start operating again in its full scope in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by the Paris outcome.</p> <p>From 2021 onwards, the ETS must cover all inner-EU flights and 50% of all outgoing and 50% of all incoming international flights:</p> <ul style="list-style-type: none"> • Aviation must be subject to the same 2030 target as the other ETS sectors; • No free ETS allowances must be given to the aviation sector from 2017 onwards and its auctioning revenues must be earmarked for the Green Climate Fund; • Emissions from flights that start and/or end in the EU must not be compensated with international carbon offsets; • The ETS target must be brought in line with the Paris Agreement. Therefore the currently proposed 2030 ETS target of minus 43% below 2005 levels must be raised significantly.
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>Fuel taxation and/or VAT is a more effective measure for small operators since there are fewer or no legal barriers to such policies for small non-commercial aircraft.</p>
<p>Submit any other comments you may have.</p>
<p>ICAO significantly lacks transparency and therefore breaches the Aarhus convention. Transparency has to be increased substantially to ensure any agreement reached by ICAO reflects the needs and voices of civil society. The recently agreed ICAO CO2 standard fails to reduce emissions from the sector. The EU must provide complementary measures - fuel taxation, VAT, improved efficiency standards etc. Currently the EU does not speak with a unified voice at ICAO meetings. This significantly weakens the EU's impact and undermines a push for strong climate action in the aviation sector. The EU should negotiate at ICAO in a unified single voice that advocates for strong climate action in line with the Paris Agreement.</p> <p>Handing out 85% free ETS allowances, perpetuating the fuel tax exemption and VAT exemption for aviation while charging busses and trains disproportionately favors a more climate damaging mode of transportation.</p>

8.

Name of the individual or organisation
AVIONS DE TRANSPORT REGIONAL (ATR)
Capacity in which the individual/organisation is completing Questionnaire
Private enterprise
Business sector
Aviation - Original Equipment Manufacturer
If your organisation is registered in the Transparency Register, please give your Register ID number:
069449920691-52
Please give your country of residence/establishment
France

<p>Please indicate your preference for the publication of your response on the Commission's website</p>
<p>Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication</p>
<p>Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?</p>
<p>Air transport industry has set objectives of stabilization of net emissions from 2020 through carbon neutral growth net aviation carbon emissions contraction by half by 2050 of what they were in 2005. Achieving these goals require a strong commitment from all stakeholders, including governments and non-governmental organizations working together through four strategic approaches:</p> <ul style="list-style-type: none"> - Improved technology; - Aircraft operations; - Infrastructure improvements; - A properly-designed global market-based measure (MBM). <p>Significant emission reduction will only be possible with the contributions of every stakeholder, and with global regulations ensuring fair competitions.</p> <p>ATR participates in industry's improvements and is committed to offer airlines and their passengers an environmentally sustainable solution for regional transport. It must be noted that our turboprop aircraft consume 25 to 40% less fuel and produce up to 50% less CO₂ than similar-sized regional jets.</p>
<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p>
<p>A MBM needs to fill any remaining emissions gap. We should bear in mind that MBM for aviation can only have significant results if part of a broader package of measures to address aviation's CO₂ emissions. As aviation is one of the motor of global economy (in 2013, it accounted for 57million jobs and \$2.2 trillion in global GDP), it should not suppress demand for air travel or hamper economic development.</p> <p>MBM applied to aviation must be global in scope, preserve fair competition, and take account of different types and levels of operator activity. The safe, orderly and efficient functioning of today's air transport system relies on a high degree of uniformity in regulations, standards and procedures.</p> <p>It is critical that an agreement is reached at the 39th ICAO Assembly. A failure to do so would further expose our industry to the costs of a complex patchwork of climate-related taxes, charges, emissions trading schemes and other overlapping and contradictory measures.</p>
<p>In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?</p>
<p>The industry has already invested billions of dollars and undertaken collaborative actions in order to cut passenger carbon dioxide per kilometre by half compared to 1990. The aviation industry is confident that technology, operations and infrastructure measures will provide long-term solutions for aviation's sustainable growth but it needs as well action from governments in accordance with emissions reduction objectives.</p> <p>Indeed, authorities can act with the adoption of a global offsetting scheme (GMBM) but also on diverse key variables:</p> <ul style="list-style-type: none"> - Air traffic management investment and reform; - The right policy framework for continued support for research into new technology and operation improvements, and for fastest availability of sustainable alternative fuels for aviation. <p>For instance, ATR contributes to European research programs in greener aviation transport, CleanSky and Sesar, which are improving aviation environmental performance.</p> <ul style="list-style-type: none"> - Improved intermodal transport planning.
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>Firstly, it is necessary to specify that ATR aircraft are considered as low emission emitters. As we strive for technology improvements and a continuous reduction of ATR aircraft's environmental footprint, we are constantly decreasing our aircraft's emissions.</p> <p>Yet, on the assumption that a fair and robust MBM will be adopted at the 2016 ICAO Assembly in September, the main principles and criteria guiding a review of the EU ETS should consist of:</p> <ul style="list-style-type: none"> - preserve competitiveness of European aviation industry; - avoid competitive disadvantages or market distortions that would add burdens on air transport activities; - pave the way for an efficient implementation of a global MBM in 2020.
<p>Which options should be considered beyond 2020?</p>
<p>In recent years, the number of carbon pricing instruments, such as CO₂ taxes or emissions trading schemes, has grown dramatically across the globe. A similar proliferation of carbon pricing instruments on aviation would result in an unsustainable patchwork of measures for air transport industry.</p>

Therefore, it is needed to move toward a global MBM that would ensure the limitation of emission in a context of fair competition worldwide. To maintain EU ETS scheme would create market distortions and unfair competition rules for European civil aviation.

As air transport industry is a global industry, it should be regulated globally: that is why ICAO must continue to play the leading role in these efforts.

9.

Name of the individual or organisation
Airlines for America (A4A)
Capacity in which the individual/organisation is completing Questionnaire
Non-governmental organization; airline trade association
If your organisation is registered in the Transparency Register, please give your Registry ID number
78160685782-84
Please give your country of residence/establishment
United States
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
International aviation has a tremendous fuel efficiency improvement and GHG emissions savings record and is committed to a series of goals and measures to continue to reduce aviation's climate impact going forward. Our global aviation coalition has committed to 1.5% annual average fuel efficiency improvements through 2020 and carbon neutral growth from 2020 (CNG2020), subject to critical aviation infrastructure and technology advances achieved by government and industry. To the extent we are not able to meet CNG2020 through concerted industry and government investments in new aircraft technology, sustainable alternative aviation fuels and air traffic management and infrastructure improvements, we support the development of a properly-designed global carbon offset program under the ICAO as a "gap-filler." Governments should support the effort to reach a consensus agreement at ICAO and work with industry to further advance technology, operations and infrastructure measures.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Overall, States should agree to a global carbon offset program to be used as a gap-filler for CNG2020. This must be premised on continued government support for technology, operations & infrastructure measures and a commitment that the ICAO GMBM will be in lieu of other MBMs. States should commit to finalizing ICAO work on MRV, emissions units criteria and registries and prepare to implement these provisions in a timely manner after the Assembly. To the extent that phase-ins or exemptions are agreed for purposes of differentiation, it is essential that mutual exemptions be provided on routes to and from excused States and there should be no redistribution of excused emissions so distortions are minimized and the non-discrimination imperative under the Chicago Convention is met. Moreover, States should determine a way to allocate responsibility for offsetting the growth emissions beyond 2020 that includes a reasonable balance between individual and collective sectoral responsibility.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
The ICAO GMBM should be in lieu of applying existing and new economic measures to international aviation. For domestic aviation, governments should support industry in advancing technology, operations & infrastructure measures. Governments should take action to enhance ATC efficiency and the EU should fully implement the Single European Sky, which would bring significant emissions savings. Key means for advancing ATC efficiency, management and procurement includes separating the air navigation service provider from the government regulatory function. Governments should further support the deployment of sustainable alternative jet fuels. The EU should financially support work to have proven alternative jet fuels included in the jet fuel specification, which to date has been funded by the US government and industry. States should be encouraged to address their efforts to advance both domestic and international aviation emissions efficiency & savings through ICAO's State Action Plans.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
The focus of the EU States as well as all States should be on finalizing the work on an ICAO carbon offset system and on preparing to implement that system. Accordingly, while appreciating that EU Regulation 421/2014

<p>“stops the clock” on the extraterritorial application of the EU ETS for flights to and from Europe through year-end 2016, the EU should revise the regulation and relevant legislation to fully eliminate the extraterritorial application of the EU ETS to international aviation. Further, given that the flights between European countries are international flights, the EU should take steps to transition the intra-EU ETS system as applied to such flights to an ICAO-agreed system. Applying unilateral, conflicting and/or duplicative MBMs applying to aviation would impose undue burden on the industry, harm local and regional economies and create unnecessary international conflicts that can be avoided by continuing to work through ICAO and consistent with international agreement.</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>As noted, the EU should revise the EU ETS Regulation 421/2014 and corresponding legislation to fully eliminate the extraterritorial application of the EU ETS to international aviation – another short-term “stop the clock” approach would be insufficient and could undermine the trust necessary for global implementation of an ICAO GMBM. Also as noted, given that the flights between European countries are international flights, the EU should take steps to transition the intra-EU ETS system as applied to such flights to an ICAO-agreed system.</p>
<p>Which options should be considered beyond 2020?</p>
<p>The ICAO GMBM is intended as a “gap-filler” to support CNG from 2020. This is an appropriate target for international aviation emissions given the tremendous fuel efficiency already achieved by aviation, which shepherds aviation CO2 emissions to good use in helping drive local and national economies and the global economy. Thus, the focus should be on implementation of the ICAO GMBM under the agreed emissions target and on continued government and industry initiatives to further advance technology (including sustainable alternative jet fuels), operations and infrastructure to achieve additional GHG efficiency savings and emissions reductions within the sector.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>As noted, the EU should revise the EU ETS Regulation 421/2014 and corresponding legislation to fully eliminate the extraterritorial application of the EU ETS to international aviation – another short-term “stop the clock” approach would be insufficient and could undermine the trust necessary for global implementation of an ICAO GMBM. Also as noted, given that the flights between European countries are international flights, the EU should take steps to transition the intra-EU ETS system as applied to such flights to an ICAO-agreed system. The GMBM for international aviation is slated to be a carbon offset system. Yet, to date, the EU has severely limited the use of carbon offsets under the EU ETS, particularly for aircraft operators subject to the scheme. The EU States and others should take steps to promote carbon offset projects around the world to foster carbon emissions reductions and stimulate a robust market.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>A4A supports technical exemptions for very small operators. For international aviation, these should be consistent with what is agreed at ICAO.</p>
<p>Submit any other comments you may have.</p>
<p>Although U.S. airlines contribute only 2% to the U.S. GHG inventory & the world’s airlines contribute only 2% to global CO2, we take our role in controlling GHG emissions very seriously. U.S. airlines improved fuel efficiency over 120% since 1978, saving 3.8 billion metric tons of CO2 emissions, equivalent to taking 23 million cars off the road each year. They carried 20% more passengers & cargo in 2014 than in 2000, while emitting 8% less CO2, improving fuel efficiency 31% over this time period alone. A4A and its members are committed to continuing to implement measures that improve fuel efficiency and reduce CO2 emissions and potential climate change impacts, while allowing commercial aviation to continue to serve as a key contributor to the global, regional & local economies. We support the recently agreed ICAO CO2 certification standards for future aircraft and the development of a GMBM to serve as a gap-filler for CNG2020. We urge the EU States continue to work through ICAO.</p>

10.

Name of the individual or organisation
International Air Carrier Association (IACA)
Capacity in which the individual/organisation is completing Questionnaire
International organisation
If your organisation is registered in the Transparency Register, please give your Register ID number:

686630315059-63
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
<p>IACA has always been in favour of a single GMBM as it is the optimal market mechanism aimed at improving environmental performance without creating distortion of competition, extra taxes or unjustified burdens on airlines.</p> <p>Such GMBM should be agreed internationally by ICAO. This is consistent with the international nature of aviation and with the need to find a global response to a global issue.</p> <p>Indeed, regional schemes capture fewer emissions than the expected GMBM. A patchwork of parallel / competing / conflicting schemes would inevitably result in competitive distortion and unnecessary administrative complexity.</p> <p>Hence, IACA expects that the adoption and implementation of the GMBM will replace the current EU ETS. Today the EU ETS only applies to flights within the EEA. We trust that this legislation can be amended to provide for an appropriate transition mechanism to ensure that operators currently subject to the EU ETS are not subject to a double scheme with overlapping measures.</p>
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<p>IACA hopes that ICAO's Assembly decides on a GMBM design that is not only robust, but is also satisfies the following criteria</p> <ul style="list-style-type: none"> - be mandatory and non-discriminatory (i.e. avoids market distortion), equal and fair opportunities. Competing flights, on a route-by-route basis, must be treated in the same way. - easy to implement; avoid a high administrative burden on airlines - no duplication of measures: a ton of aviation CO2 which is subject to the ICAO GMBM should not be subject to any other measure. - provide for an equitable balance between a 'collective' element (reflecting the individual carrier's share of total industry emissions) and an 'individual' element (reflecting the individual carrier's growth above baseline emissions); - be seen together with important actions in technology, operations and infrastructure efficiency improvements; <p>ICAO should also issue guidance with respect to the MRV requirements, as well as to the eligibility of emission units.</p>
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
<p>IACA considers that if any measures to address emissions from domestic aviation (which is not included in the ICAO GMBM) are adopted by individual (groups of) countries, the design of such measures should be inspired as much as possible by the design of the ICAO GMBM. Airlines should indeed not be subject to systems which are in complexity much different for their international and domestic CO2 emissions. IACA reiterates that any ton of CO2, of international or domestic flights, has an identical impact on global climate change. Therefore, the design of related climate change mitigation measures for domestic flights should not be fundamentally different.</p>
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
<p>The review of the EU ETS following the 2016 ICAO Assembly should follow the principles of the adopted ICAO Resolution.</p> <p>IACA considers that non-discrimination, equal and fair opportunities are principles that are not only valid in a beyond 2020 timeframe, but should also be activated before that year.</p> <p>IACA further advocates administrative simplification as well as clear, predictable and consistent long-term legislative planning as to provide air operators with the necessary legal certainty for their business plans.</p>
Which options should be considered for the EU ETS for the period 2017-2020?
<p>IACA considers that, in line with the ICAO principles of non-discrimination, equal and fair opportunities, no block of countries should be subject to climate change mitigation measures, unless the entire world is subject to such measures. As CO2 emissions have a world-wide impact on climate change, any stand-alone regional scheme on such emissions would entirely miss the point.</p> <p>As a consequence, IACA sees no other option but to suspend the entire aviation EU ETS Directive until 2021 after ICAO reaches an agreement on a GMBM which would cover CO2 emissions from 2021.</p>

<p>Which options should be considered beyond 2020?</p> <p>An ICAO agreement would establish a GMBM which would cover CO2 emissions from 2021. As MBMs should not be duplicative, international aviation CO2 emissions should only be subject to one single measure. As a result, no other options for international aviation CO2 emissions should be considered.</p> <p>Nevertheless, IACA would like to reiterate that a GMBM is only one element out of a basket of ICAO measures, besides the implementation of the recently adopted CO2 efficiency standard for new aircraft, the development of guidance documents on operational measures and initiatives to promote the development and testing of alternative sustainable fuels from non-fossil sources.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>The aviation sector has a strong international character. This implies that even a small cost-differential in climate mitigation measures results in market distortions, for example between operators providing services through exempted routes vs operators providing services through routes which are subject to the EU ETS obligations.</p> <p>As CO2 emissions have no local but have instead a worldwide impact, airlines that are flying routes within Europe should not be subject to other rules than those imposed on airlines that are operating other routes. Airlines are not in competition with stationary installations under the EU ETS. Also, these stationary installations are not subject either to many other rules that are imposed on aviation. Therefore, IACA does not agree with the principle of a “better alignment of the rules applicable to aviation and stationary installations”.</p>
<p>Submit any other comments you may have.</p>
<p>IACA regrets the poor level of consultation and information flow from the European Commission (and EU Member States) on the European views and negotiating position on both the design elements of the Global Market Based Mechanism and, most importantly, on the detailed conditions to be met for the EU to consider the GMBM as a satisfactory scheme to tackle international CO2 emissions.</p>

11.

<p>Name of the individual or organisation</p> <p>Global Shippers Forum</p>
<p>Capacity in which the individual/organisation is completing Questionnaire</p> <p>Trade Association</p>
<p>If your organisation is registered in the Transparency Register, please give your Register ID number:</p> <p>056183221914-36</p>
<p>Please give your country of residence/establishment</p> <p>United Kingdom</p>
<p>Please indicate your preference for the publication of your response on the Commission's website</p> <p>Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication</p>
<p>Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?</p> <p>The Global Shippers’ Forum (GSF) is the international body for global shippers established by over 20 national and regional shippers’ organisations worldwide. It believes that air freight is core to making supply chains operate efficiently and notes that it will be challenging for the aviation industry to respond to the need to reduce greenhouse gas emissions.</p> <p>We believe the sector is under increasing scrutiny due to the absence of aviation from the Paris Agreement, with the emphasis on ICAO to make progress in this area. We believe that ICAO is making sufficient effort to ensure that international aviation makes a contribution to reducing the impact of climate change. ICAO has developed a comprehensive strategy to progress technology, operations and alternative fuels to reduce emissions as much as possible and is then due to establish carbon offsetting as a market-based measure to make up the shortfall.</p>
<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p> <p>We understand that carbon offsetting is likely to be the chosen GMBM. ICAO should ensure that there is a robust data collection system that includes efficiency standards place to form the basis of offsetting. However with airline margins tight and the economy only just in recovery, there is a concern that the cost of offsetting will be passed on to customers. GSF would therefore call for a MBM that shares the cost burden between</p>

operators and customers, and for an impact assessment to be carried out in advance of an agreement, to ensure the wider economic, social and environmental impacts are fully understood.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
As aviation is a globalised sector, the most efficient way to address greenhouse gas emissions is via global measures. Countries are already obliged to submit state plans to ICAO on aviation carbon emissions and EU Member States are also part of the European Civil Aviation Conference. If national governments wish to impose additional measures on domestic flights they have the power to do so, however the ideal situation would be to have a single approach agreed at ICAO.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
There should be a fundamental review of whether including aviation in the EU ETS is still necessary to reduce European greenhouse gas emissions in light of the agreement at ICAO. A full regulatory impact assessment should be carried out to assess the policy cost of this approach.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
This exemption should be kept under review, and should remain in place unless the number of small operators becomes so great as to cause a material increase in GHG emissions.

12.

Name of the individual or organisation
European Regions Airline Association
Capacity in which the individual/organisation is completing Questionnaire
International organisation
If your organisation is registered in the Transparency Register, please give your Register ID number:
73491621553-11
Please give your country of residence/establishment
United Kingdom
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
ERA has always been supportive of market-based measures as one of a series of potential mechanisms aimed at improving the environmental performance of aviation without creating distortion of competition, additional taxes or unjustified burdens on airlines. As a part of a global industry, Europe should contribute to and support the adoption of global market-based measures, under the aegis of ICAO, aimed at the adoption of a balanced approach based on four pillars: technology progress, operational measures, infrastructure improvements and economic incentives (for example to promote sustainable aviation fuels). ERA, as well as the rest of the industry, is committed to carbon neutral growth as of 2020. In light of the above, we expect that the adoption and implementation of the ICAO global solution (GMBM) will replace the EU Emissions Trading System. We therefore call upon the Commission to take these considerations into account when drafting its legislative proposal
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Be a mandatory global carbon offsetting scheme effective as of 2020; Limit exemptions to the minimum so as to preserve its environmental integrity; Competing flights, on a route-by-route basis, must be treated in the same way; the cost of a global offsetting scheme should be a minor element in airlines' operating costs and the impact on the development of aviation, or on trade and tourism, must be also minimised; emissions should be counted for only once and multiple (national) environmental taxes and charges should be removed as a result of the adoption of a global MBM; complement the other three ICAO pillars; be non-discriminatory (i.e. avoids market distortion), equal and fair; be easy to implement; avoid disproportionate and unnecessary administrative burden on airlines, especially smaller operators; no duplication of measures on CO2; eligibility criteria for emissions units (allowances, offsets) must be credible, clear, transparent, based on sound evidence
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Any domestic or regional market-based mechanism not covered by the global scheme should be adopted following a sound assessment showing that the ICAO system, as well as the combination of the three other

<p>climate-related ICAO pillars is not sufficient to deliver the overall environmental goals. Should any domestic/regional scheme be imposed, its functioning, design, concept and rules must be largely inspired and harmonized to the ICAO GMBM. Airlines should not be subject to a plethora of systems whose divergence and complexity would simply result in disproportionate costs to the industry. The design of related climate change mitigation measures for domestic and for international operations should not diverge. Where an impact assessment is launched by national or regional authorities to show that the imposition of a national or regional market-based mechanism is necessary, the burden from existing taxes on the aviation sector must be taken into due account</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>After the ICAO Assembly the EU ETS legislation should be replaced by the agreed GMBM. An appropriate transition mechanism should be agreed to ensure that operators currently subject to the EU ETS are not subject to a double scheme with separate, overlapping measures and duplicated administrative obligations. To ensure a more robust business certainty and in order not to unduly discriminate and penalize intra-EU operators, the EU ETS should be suspended in its entirety before the full implementation of the GMBM. The review of the EU ETS should be based on: non-discrimination, equal treatment, fair opportunities, administrative simplicity, cost effectiveness, environmental integrity, administrative simplification, a clear, predictable and consistent long-term legislative planning, strong commitment to re-invest revenues from ETS on aviation-related green technologies, research and development, general decrease in the level of environmental charges and taxes currently imposed on aviation</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>In line with the ICAO principles of non-discrimination, equal and fair opportunities, no block of countries should be subject to climate change mitigation measures, unless the entire world is subject to them. As CO2 emissions have a world-wide impact on climate change, any stand-alone regional scheme on such emissions would entirely miss the point and, as demonstrated by the recent history of the EU ETS, may only trigger serious international disputes, embarrassing political consequences to the credibility of the entire scheme, and diminished environmental integrity of a regional scheme as opposed to a global one. The only option is for the EU Institutions to suspend the aviation EU ETS Directive until a full GMBM is in force. Such strategy would defuse international tensions in case the full scope of the original ETS legislation was re-imposed and it would prevent any direct or indirect discrimination against those air carriers operating mainly intra-European routes.</p>
<p>Which options should be considered beyond 2020?</p>
<p>Options beyond 2020 depend on the nature, scope, environmental integrity and political credibility of the agreement reached at ICAO in the next months. An ICAO agreement would establish a GMBM to cover CO2 emissions as of 2021. As MBMs should not be duplicative, international aviation CO2 emissions should only be subject to one single measure. As a result, no other options for international aviation CO2 emissions should be considered.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>The aviation sector has a strong international character. This implies that even a small cost-differential in climate mitigation measures results in market distortions, for example between operators providing services through exempted routes as opposed to operators providing services through routes which are subject to the EU ETS obligations. As CO2 emissions have a worldwide impact, airlines flying routes within Europe should not be subject to other rules than those imposed on airlines that are operating other routes. Airlines are not in competition with stationary installations under the EU ETS. Also, these stationary installations are not subject to many other rules that are imposed on aviation. Therefore, the principle of a "better alignment of the rules applicable to aviation and stationary installations" does not seem to be justified.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>Exemptions should be considered for commercial and non-commercial small emitters up to 25,000 tonnes per annum. This exemption reflects the greater administrative burden on small operators versus the environmental effectiveness of the scheme on reducing CO2 emissions from small operators. Consideration should also be given to a simple compliance method for reporting and verification for smaller emitters above 25,000 tonnes to reduce the administrative on such operators.</p>
<p>Submit any other comments you may have.</p>
<p>ERA regrets the poor level of consultation and information flow from the European Commission on its views and negotiating position on both the design elements of the Global Market Based Mechanism and, most</p>

importantly, on the detailed conditions to be met for the EU to consider the GMBM as a satisfactory scheme. At present, the future of the EU ETS legislation post 2016 is obscure and the uncertainty faced by the air operators risks affecting their short and mid-term planning decisions, delaying investment plans and, ultimately, threatening the profitability prospects of the European operators, with a direct impact on employment, mobility, GDP and regional connectivity. The EU should refrain from initiatives that ultimately lead to the manipulation of carbon market and contradict the spirit of a market-based mechanisms. EU institutions and States are also urged to move the Single European Sky from concept to reality and secure funding to SESAR projects' technology solutions.

13.

Name of the individual or organisation
International Airlines Group
Capacity in which the individual/organisation is completing Questionnaire
International organisation
If your organisation is registered in the Transparency Register, please give your Register ID number:
60340504060-88
Please give your country of residence/establishment
United Kingdom
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
IAG calls on Governments to reach an agreement on a global market-based measure (GMBM) to address global aviation emissions and to replace the EU ETS for aviation with the GMBM. We support the ICAO objective to cap the growth of net carbon dioxide from international aviation emissions from 2020. The aviation industry also advocates a goal to halve net carbon dioxide emissions by 2050 compared to 2005.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
For the GMBM to take effect from 2020, the 2016 ICAO Assembly will need to reach an agreement on the key design elements of the GMBM that keep the GMBM as simple as possible in terms of administration and avoids any market distortion. There will need to be continuing effort on the detailed design elements after the 2016 Assembly to allow the GMBM to become fully operational from 2020 and many States will require support with its implementation. Key design elements of the GMBM to be agreed at the Assembly include potential provisions for differentiation at route-level (phase-in), and a non-distortive mechanism to determine operator obligations.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Implementation of the GMBM should make existing and new economic measures for international aviation emissions unnecessary. We expect the ICAO GMBM to replace the aviation Emissions Trading Scheme in Europe. The GMBM should be flexible enough to enable its application to domestic aviation emissions should a State or group of States wish to voluntarily deploy the GMBM to cover these emissions. This will make it far simpler for airlines to comply with schemes that all follow the same design principles of the GMBM.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
The priority must be the implementation of the GMBM and completion of the work in ICAO. During the EU ETS review, the legislator should ensure the competitiveness of European carriers and avoid adverse financial and political implications. The EU ETS review should take into account the global political will to make progress on a global solution and the extent of positive engagement from States in the development of a GMBM through ICAO. Agreement of the key elements at the ICAO 2016 Assembly, with a robust roadmap outlining the timelines to the final detailed design would demonstrate significant progress towards a GMBM. We expect the ICAO GMBM to replace the aviation ETS in Europe. The review should thus provide for an appropriate transition mechanism to ensure that operators will not be regulated twice with separate, overlapping measures and a duplication of administrative obligations.
Which options should be considered for the EU ETS for the period 2017-2020?
To enable focus on the implementation of the GMBM, the EU ETS for aviation should be unchanged for the

period 2017 – 2020 continuing with an intra-European scope.
Which options should be considered beyond 2020?
Implementation of the GMBM should make existing and new economic measures for international aviation emissions unnecessary including the EU ETS. The EU needs to ensure that there is a smooth transition from the intra-European coverage of the EU ETS to allow these emissions to be covered by the GMBM. The EU should also provide assistance to those states that wish to use the GMBM to cover their domestic aviation emissions. In addition, the EU and its member states should support the detailed implementation of the GMBM including potential support to non-EU member states that require assistance particularly with the Monitoring, Reporting and Verification requirements
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
Following agreement at the ICAO General Assembly the EU should at the earliest opportunity prepare plans for the smooth transition from coverage of aviation emissions within the intra-European to coverage through the GMBM. There should be no overlap of emissions coverage by the EU ETS and the GMBM for any period of time. This transition should aim to minimize any administrative burden on airlines as there will already be a significant amount of effort required by carriers to ensure full compliance to the GMBM.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Insofar as small operators are subject to EU ETS, we believe exemptions are appropriate to avoid placing a disproportionate administrative burden on operators that only account for a very small quantity of CO2 emissions. In general, the treatment of small operators under the GMBM and EU ETS should be aligned to the maximum extent possible.

14.

Name of the individual or organisation
International Air Transport Association
Capacity in which the individual/organisation is completing Questionnaire
Professional organisation
Please indicate the sectors your organisation represent
Air transport
Where is your company located?
Canada
If your organisation is registered in the Transparency Register, please give your Register ID number:
1805107590-28
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
The Paris Agreement can be seen as a bridge between today's policies and the objective of climate-neutrality before the end of the century. The aviation industry is already committed to carbon neutral growth from 2020 (CNG2020). Economies around the world wish to foster and develop further the vital connectivity for trade, investment and tourism that air transport makes possible. These aspirations are legitimate but must be accompanied by efforts in all industrial sectors. Aviation supports around 60 million jobs, a third of global trade by value and half of all international tourists. The industry must continue to respond to the economic and social demands of society, particularly in the developing world, whilst at the same time addressing its emissions in line with what is economically reasonable and technologically feasible. IATA therefore calls on Governments to reach an agreement on GMBM to complement technology, operational and infrastructure measures and achieve CNG2020.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
In IATA's view, for the GMBM to take effect from 2020, the 2016 ICAO Assembly should reach an agreement on the key design elements of the GMBM, including initial guidance for monitoring, reporting and verification

<p>(MRV) requirements as well as for the eligibility of emissions units. IATA recognizes that some outstanding work will need to be undertaken after the 2016 Assembly to allow the GMBM to become fully operational from 2020 and assist States with its implementation.</p> <p>Key design elements of the GMBM to be agreed in 2016 include potential provisions for differentiation at route-level (phase-in), allocation of offset obligations at operator level and technical exemptions (i.e. potential adjustments for specific categories of operators).</p>
<p>In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?</p>
<p>Implementation of the GMBM should obviate the need for existing and new economic measures to be applied to international aviation emissions on a regional or national basis. To address emissions from domestic aviation, IATA believes that national policies should first concentrate on the deployment of sustainable alternative fuels and the implementation of optimized procedures and infrastructure.</p> <p>Whilst recognizing that domestic aviation is beyond the scope of the GMBM, IATA believes that any market-based measures for domestic aviation should be aligned and compatible with the GMBM to the greatest extent possible with the aim to avoid regulatory fragmentation and minimize the administrative burden for operators and potential market distortions.</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>IATA believes that the priority should be the implementation of the GMBM and completion of the work in ICAO. Our major concern is that if EU ETS was reintroduced on flights between the EEA and third countries, other ICAO Member States would perceive this as a step back from the agreement to be reached in ICAO. IATA expects that the adoption and implementation of the ICAO GMBM will replace the EU ETS legislation currently applicable to all flights within the European Economic Area (EEA). We are confident that the EU ETS legislation can be amended to provide for an appropriate transition mechanism to ensure that operators currently subject to the EU ETS will not be regulated twice with separate, overlapping measures and a duplication of administrative obligations.</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>The adoption of Regulation 421/2014 has contributed to creating a positive setting for negotiations in ICAO. An extension of the application of Reg. 421/2014 for the period 2017-2020 would have a similarly beneficial effect and avoid any political distractions from the remaining tasks (e.g. finalization of MRV requirements in ICAO, adoption of national legislation to implement the GMBM). This is particularly important as, in the period 2017-2020, experts from the European Commission and EU Member States will have a key role to play in contributing to ICAO's remaining work on the operationalization of the GMBM.</p> <p>It should be noted that many States and industry stakeholders have agreed to support the GMBM but only on the premise that it would prevent the introduction of unilateral measures for international aviation.</p>
<p>Which options should be considered beyond 2020?</p>
<p>In IATA's view, the implementation of a single GMBM should obviate the need for existing and new economic measures to be applied to international aviation emissions on a regional or national basis. Therefore, all international flights to/from airports in the EEA should be subject exclusively to the GMBM and removed from the scope of the EU ETS.</p> <p>In IATA's view, while domestic flights are beyond the scope of the GMBM, any market-based measures applicable to domestic flights should be aligned and made compatible with the GMBM to avoid regulatory fragmentation and to reduce the administrative burden for operators and Governments and minimize potential market distortions.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>In IATA's view, the implementation of a single GMBM should obviate the need for existing and new economic measures to be applied to international aviation emissions on a regional or national basis. In addition, while domestic flights are beyond the scope of the GMBM, any market-based measures applicable to domestic flights should be aligned and made compatible with the GMBM to avoid regulatory fragmentation and to reduce the administrative burden for operators and governments and minimize potential market distortions.</p> <p>Insofar as the continued application of EU ETS to domestic aviation is considered, the economic and competitive impact on domestic and regional operations should be thoroughly assessed and taken into account in particular in a potential review of the rules applicable to the allocation or auctioning of allowances.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>

Insofar as small operators are subject to EU ETS, IATA believes exemptions are appropriate to avoid placing a disproportionate administrative burden on operators that only account for a very small quantity of CO2 emissions. In general, the treatment of small operators under the GMBM and EU ETS should be aligned to the maximum extent possible.

15.

Name of the individual or organisation
EBB - European Biodiesel Board. Non-profit organisation established in January 1997, the EBB groups the large majority of EU biodiesel producers, accounting for more than 75% of EU biodiesel output
Capacity in which the individual/organisation is completing Questionnaire
European industry association
If your organisation is registered in the Transparency Register, please give your Register ID number:
84244281858-12
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
To reduce transport GHG emissions, all actors in the aviation sector should contribute, considering the availability of cost-effective GHG reduction efforts in their sub-sector. The aviation industry ambitious goals to reduce emissions by 2050 are unattainable without an unprecedented expansion of biofuels production. Aviation biofuel can potentially save over 1 billion metric tons of CO2 annually by 2050 – more than all of the other potential sources of carbon abatement combined. In addition, as well as reducing emissions, diversifying fuel supply can also be an important risk management strategy, reducing carriers' exposure to jet fuel price volatility in the long term. The aviation sector should expand RD&D of sustainable biofuels, and governments and airlines should work together to advance renewable jet fuel technology to reach a commercial scale, while ensuring the delivery of real GHG reductions compared with alternatives, and the use of stringent sustainability criteria.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Together with the global MBMs for aviation, more biofuels for aviation can contribute significantly to the reduction of GHG emissions in the sector. Unlike road traffic, the EU doesn't have mandated biofuels levels on for air transport to encourage their uptake. As a result, its usage has been limited to isolated trials. Since biojet remains much more expensive than traditional kerosene, for its further deployment, EU-level incentives are key. Even low blends, for example 5-10% biofuel blend in kerosene, might lead to significant cost imbalances. If this fuel is purchased only by some airlines on a voluntary basis, these will not be able to pass on their costs to the passenger. Government should support 1) further investment and R&D in emerging feedstocks such as waste based biofuels (to increase their production); 2) building new infrastructure for biofuel production; and 3) policies such as extending biodiesel production grants to biojet fuel to make them more commercially viable.
Which options should be considered beyond 2020?
For aviation, liquid biofuels are the only low-CO2 option for substituting kerosene, as they have high specific energy content. Beyond 2020, if the right support measures are put in place at EU level, we believe aviation biofuels will have an increasing role in climate change mitigation. In particular, if the MBMs currently under negotiation at ICAO level deliver the expected results (i.e. a global strong and ambitious carbon market for aviation), a future rise of prices on the carbon market would favour greater biojet uptake in the future, and contribute to reduce GHG emissions from air transport. For the time being, as the carbon price is too low, there is a need for biojet mandates in order to prepare the future and have available biojet molecules when they will be needed.
Submit any other comments you may have.
A stronger support of research and development for all aviation fuels is key in order to contribute at the maximum to a reduction in GHG emissions from aviation. Alternative low carbon fuels for the aviation sector should be included in the range of technologies eligible to access the Innovation Fund and other EU funding mechanisms.

Name of the individual or organisation
Transport and Environment
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus:
T&E is Europe's leading NGO campaigning for cleaner transport. Our mission is to promote, at EU and global level, a transport policy based on the principles of sustainable development.
If your organisation is registered in the Transparency Register, please give your Register ID number:
58744833263-19
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
Emission reductions should be driven at both ICAO & EU level. Aviation should pay for all external costs, not just those above 2020 levels. In-sector reductions have to be promoted, e.g. by incentivising technology & operations improvements. ICAO's CO2 standard contributes nothing towards this and has perverse effects. The EU should fix or abolish. As well as ending fuel tax & state aid subsidies, demand management, VAT & ticket taxes should be introduced. Routes between developed countries should have more ambitious reduction goals. Increase ambition over time in line with the 1.5° Paris goal. EU measures should rely on domestic reductions, not on international credits which in ICAO must comply with strict quality criteria in line with the SDGs & the Paris commitment to no double-counting. EU should reject US/ICAO's attempts to constrain ambitious policies at state/regional level. Aviation will continue to drive climate change; the sector must contribute to climate finance.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
The Assembly Resolution must deliver an environmentally effective GMBM, i.e. true Carbon Neutral Growth 2020 (CNG2020) from 2021. A large emissions gap as at present is a showstopper. EU must ensure developed states/airlines MUST do more. It should set strict and mandatory criteria for emission units that comply with common social and environmental standards. All credits that are listed as lacking environmental integrity should be excluded. ICAO must commit to strengthen measures beyond CNG2020 at each review and encourage ambitious states to go further. An early MRV start is imperative. To avoid double-counting, stringent and environmentally sound accounting and MRV rules for alternative fuels and offset credits, linked to UNFCCC accounting rules, should be put in place. ICSA developed an exhaustive checklist to ensure an effective GMBM. ICAO needs to start work on non-CO2 emissions.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
States, as a group or on a bilateral basis, should be empowered and encouraged to use the GMBM to increase ambition through e.g. discounting, including non-CO2 emissions, increasing ambition on route groupings such as the Atlantic. A single global MRV provides administrative simplicity for operators, but the environmental integrity of the MRV needs to be high, otherwise states will deviate. ICAO and UNFCCC registries should be coupled to avoid double-counting. Nothing in the Assembly Resolution should prohibit states to implement more ambitious measures (such as addressing non-CO2 emissions, addressing emissions below CNG2020, stricter standards). All Annex I countries, especially the USA, should make domestic aviation cuts in line with Paris. Parallel policies should be applied as appropriate, such as taxation, phase outs, technological standards, operational measures, etc.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Combined ICAO & EU action should ensure a fair contribution to the 1.5° limit. Since early action is crucial, all aviation emissions from/to Europe should be covered. Stop the Clock is prejudicial. The Directive says that emissions from international flights to/from the EU should be fully covered from 2017 onwards. The combination of ICAO & EU measures must meet the EU 2030 reduction goal. Therefore, the share of emissions to be covered by the EU ETS from 2020 should be determined after the 2019 ICAO Assembly. The EU ETS must fill the ambition gap between the EU 2030 goal and the ICAO target, taking into account whether the ICAO ambition will be increased prior to 2030, as well as any gap in environmental integrity between EU ETS allowances and ICAO international credits. The EU should ensure a level playing field between transport modes in the single market. As other EU sectors cannot use international credits for ETS compliance, this option should not be accepted for aviation.

Which options should be considered for the EU ETS for the period 2017-2020?
Regulation 421/2014 stipulates that from January 1 2017, the EU ETS should cover all emissions from international flights from or to the EU. In the absence of other emissions trading systems for international aviation, other equivalent measures, or certainly if ICAO's ambition falls short – as things currently stand is surely will -, this provision should remain untouched. Early action is essential. Stop the Clock has already given ICAO 5 years.
Which options should be considered beyond 2020?
The scope (routes) covered by the EU ETS should depend on a review of ICAO GMBM ambition and on measures implemented by other countries. EU ambition must achieve the 2030 -40% objective taking into account what ICAO does. Since the ETS has proven to be an effective method of reducing emissions, the intra-EU aviation ETS must be retained. The cap must be consistent with the 2030 goal and be subject to the common linear reduction factor. All allowances should be auctioned. Non-CO2 can be addressed through a multiplier or by levying a charge. The EU ETS should address all emissions of inbound and outbound flights that are not covered by the ICAO GMBM to ensure Paris-level ambition. International allowances and offsets should not be used for compliance with the EU ETS. Appropriate measures should be put in place to avoid double-counting. Since fuel tax & VAT exemptions and airport subsidies work at cross purposes to the ETS, they must be abolished.
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
The EU ETS should exclude international offsets in order to avoid market distortions. The EU should aim for a single MRV aligning ICAO and EU requirements provided no loss of environmental integrity. Free allowances should no longer play a role within the EU aviation ETS since there is no carbon leakage. The aviation cap should be reduced in line with the Paris Agreement ambition. Stop the Clock has given ICAO 5 years and since no GMBM is currently in place, the EU ETS should revert to its full scope in 2017 as part of pre-2020 ambition required by the Paris Agreement.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Small non-commercial aircraft operators could continue to be exempted from the EU ETS since fuel taxation and VAT are more effective measures and should be implemented. For small non-commercial aircraft there are fewer or no legal barriers to such policies.
Submit any other comments you may have.
The ICAO CO2 standard fails to reduce in-sector emissions. Reform it immediately or reject & replace by EU phase-outs. EU tolerance of ICAO's lack of transparency breaches Aarhus. The EU must reform ICAO and accept its sovereign responsibility to reduce EU departing flight emissions. Outsourcing EU aviation climate policy to Airbus and ICAO betrays EU's Paris commitments. EU should develop complementary policies to reduce emissions, eg, a fuel tax, VAT & ticket taxes, improved efficiency standards. An ETS with 85% free allowances combined with the fuel tax & VAT exemptions, while charging busses & trains and thus distorting competition, is simply self-defeating. MS and EC Vice-Presidents must take responsibility for these failures and start to address aviation in a joined up way, not via silos where Directorates abrogate joint responsibility for addressing cross-cutting questions such as fuel tax, VAT or state aid scandals. Non-CO2 emissions must be taken seriously & measures prepared.

17.

Name of the individual or organisation
Air France
Capacity in which the individual/organisation is completing Questionnaire
Private enterprise
Please indicate the sectors your organisation represent
Aviation
If your organisation is registered in the Transparency Register, please give your Register ID number:
458155911854-78
Please give your country of residence/establishment
France
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of

it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
<p>Since 2009, the aviation sector has a common set of goals on climate action and is meeting these goals:</p> <ul style="list-style-type: none"> -1.5% per year average fuel efficiency increase until 2020 -Stabilising net CO2 emissions from 2020 -Halving the net CO2 emissions by 2050, compared to 2005 <p>These targets are ambitious and robust, particularly for a sector that is growing to meet the needs of the world's economies and society</p> <p>The industry has a strategy in place to meet our climate action obligations through:</p> <ul style="list-style-type: none"> -investing in new technology -implementing better operational performance -implementing innovative infrastructure efficiencies -developing sustainable alternative fuels (Industry needs incentives/recognition that related CO2 savings will count) -pushing for GMBM at ICAO <p>AF/KL and the aviation industry make a strong call on Governments to reach an agreement on a GMBM to address aviation emissions at global level and to replace the unilateral European system, EU ETS for aviation, with the GMBM</p>
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<p>The Assembly must adopt a GMBM scheme with key design elements such as allocation of offset obligations per operator, potential provisions for differentiation at route-level (phase-in), initial guidance for monitoring reporting & verification (MRV), requirements and eligibility of emissions units</p> <p>The scheme should respect following criteria: environmental integrity, transparency, simplicity, no extra administration or cost burden for the operators</p> <p>On the distribution of obligations a high level of collective share is more likely to be accepted by a majority of ICAO States. It would also ensure simplicity of the system as no further adjustments would be necessary, and would also minimize market distortion</p> <p>The provisions for differentiation should not create undue market distortion. For the exempted flights all operators on the same route must be treated equally irrespective of the State of origin</p> <p>Exempted emissions should not be redistributed to operators subject to the scheme.</p>
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
<p>Implementation of the GMBM should make existing and new economic measures to be applied to international aviation emissions on a regional or national basis unnecessary. Following this logic, AF/KL's expectation is that the ICAO GMBM will replace the aviation ETS in Europe. To address emissions from domestic aviation, national policies should first concentrate on the deployment of sustainable alternative fuels, the implementation of optimized procedures and the provision of infrastructure.</p> <p>Although domestic aviation is beyond the scope of the GMBM in ICAO; If a State considers to apply any kind of market-based measure to domestic flights, the measure should be aligned and compatible with the GMBM to the greatest extent possible and/or eventually include the domestic flights in the GMBM with the aim to avoid regulatory fragmentation and to minimize the administrative burden for operators and potential market distortions.</p>
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
<p>The priority must be the implementation and MRV of the GMBM and completion of the work in ICAO. During the EU ETS review the legislator should ensure the competitiveness of European carriers and avoid adverse financial and political implications</p> <p>The aviation ETS should be amended to provide for an appropriate transition mechanism to ensure that operators will not be regulated twice with separate, overlapping measures and a duplication of administrative obligations</p> <p>As operators should be equally treated on the same route, no regional model decided by a group of countries or a country can come in addition on an international route already covered by the GMBM. To that extent, GMBM shall replace aviation EU-ETS as soon as possible:</p> <ul style="list-style-type: none"> -first, "stop the clock" shall be extended up to 2020 or the decided pre-implementation phase of the GMBM -then, GMBM shall fully substitute to aviation EU-ETS starting no later than 2020 <p>Many States and industry stakeholders oppose unilateral measures</p>
Which options should be considered for the EU ETS for the period 2017-2020?
<p>The adoption of Regulation 421/2014 has contributed to creating a positive setting for negotiations in ICAO. An extension of the application of Reg. 421/2014 for the period 2017-2020 would have a similarly beneficial effect and avoid any political distractions from the remaining tasks (e.g. finalization of MRV requirements in ICAO,</p>

<p>adoption of national legislation to implement the GMBM). Experts from the European Commission and EU Member States will have a key role to play in contributing to ICAO's remaining work on the operationalization of the GMBM. For the period 2017-2020, the same scope as today (i.e. intra EU flights only) should be considered ("stop the clock") to aviation EU-ETS, as long as the GMBM has not set agreed targets on international aviation and started with its pre-implementation phase on MRV.</p>
<p>Which options should be considered beyond 2020?</p>
<p>The single GMBM should make existing and new economic measures to be applied to international aviation emissions on a regional or national basis unnecessary. Following this logic, AF/KL's expectation is that the ICAO GMBM will fully replace the aviation ETS in Europe and all international flights to/from airports in the EEA should be subject exclusively to the GMBM. AF/KL recognizes that domestic aviation is beyond the scope of the GMBM in ICAO; should a State consider to apply any kind of market-based measure to domestic flights, the measure should be aligned and compatible with the GMBM to the greatest extent possible and/or eventually include the domestic flights in the GMBM with the aim to avoid regulatory fragmentation and minimize the administrative burden for operators and potential market distortions.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>Please see above, no element of the EU ETS should be considered if and when ICAO agrees on a GMBM. The general EU ETS will continue to be applicable to stationary installations whilst aviation will be covered at global level through the GMBM.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>Insofar as small operators are subject to EU ETS, the prolongation of existing exemptions are appropriate to avoid placing a disproportionate administrative burden on operators that only account for a very small quantity of CO2 emissions. Also the treatment of small operators under the GMBM and EU ETS should be aligned to the maximum extent possible.</p>

18.

<p>Name of the individual or organisation</p>
<p>GE Europe on behalf of GE Capital Aviation Services (GECAS) and GE Aviation</p>
<p>Capacity in which the individual/organisation is completing Questionnaire</p>
<p>Private enterprise</p>
<p>Business sector</p>
<p>Multinational conglomerate corporation with the following segments: Lighting, Power, Water, Oil and Gas, Energy Management, Grid, Renewables, Aviation, Healthcare, Transportation and Capital</p>
<p>If your organisation is registered in the Transparency Register, please give your Register ID number:</p>
<p>4016736872-59</p>
<p>Please give your country of residence/establishment</p>
<p>Belgium</p>
<p>Please indicate your preference for the publication of your response on the Commission's website</p>
<p>Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication</p>
<p>Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?</p>
<p>The sector has already adopted technical standards to reduce carbon emissions from in-production and new-type aircraft. GE endorses the CNG2020 goal and supports a global market based measure (GMBM) from 2020, making operators accountable for the emissions of aircraft they control whilst appropriately protecting new entrants and small emitters. A GMBM should complement wider carbon emissions reduction measures (technical/operational improvements & sustainable fuel use). A globally harmonized program, not a patchwork of regional/national programs, will be most effective. The GMBM should ensure transparency and environmental integrity via robust MRV and Emissions Unit Criteria ("EUC") and be administratively clear and reasonable. Periodic reviews should assess its effectiveness and recommend improvements, including whether the GMBM should be terminated or extended beyond 2035, taking account of the contribution made by the wider "basket of measures" towards achieving ICAO's objectives.</p>

<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p>
<p>GE supports the EU's ambition for ICAO to adopt "the key design elements of a GMBM that allows the ICAO goal of stabilizing net CO2 emissions from international aviation at 2020 levels to be met and to establish a clear roadmap for an effective implementation from 2020".</p> <p>Key design elements to be agreed upon include:</p> <ul style="list-style-type: none"> • The need for a single GMBM for international aviation emissions; • The nature of the GMBM; • Program principles, including transparency, environmental integrity, and administrative feasibility; • The level of ambition, and the target 'end point' for the GMBM; • Which operators will be obligated under the GMBM; • Commencement date (including any phase-in provisions); • Method of calculating operators' compliance obligation; • Appropriate treatment of small emitters; • Flexibility to allow for continued market growth for all operators; • A feasible timetable post-2016 for development of MRV, EUC and other technical aspects in time for 2020 implementation.
<p>In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?</p>
<p>Domestic aviation emissions actions have an important role in complementing a GMBM for international aviation and achieving ambitions to reduce global aviation emissions in the long term. Individual nations that already have or adopt mandatory national emissions reduction schemes should align their scheme with the GMBM in terms of both the technical aspects and the level of ambition, to avoid a patchwork of domestic schemes developing. In addition, individual nations/regions should introduce improvements to domestic/regional aviation management, including ground control policies that minimize idle time, introduce next gen flight control to improve flight management, and promote policies that help accelerate the availability of sustainable alternative fuels. This would be consistent with the wider basket of measures. Regional initiatives to improve flight path efficiency (e.g. EU Single Skies) should be adopted or improved to reduce emissions from indirect/inefficient flight paths.</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>Global harmonization will likely be key to ensuring carbon reductions in a transparent, cost-effective and robust program that achieves a high level of environmental integrity and minimizes market distortion. The European Commission should undertake a complete and thorough review of the Aviation ETS following the 2016 ICAO Assembly, having regard to the following key principles/criteria:</p> <ul style="list-style-type: none"> • Alignment with and avoidance of duplication between the EU scheme and any global scheme agreed upon at the ICAO Assembly, with respect to goals, timeline, and mechanism; • Avoidance of a patchwork of EU member state domestic schemes developing, by retaining/implementing a scheme that applies consistently across the EU for non-international flights; • Accountability for compliance within the EU scheme to continue to fall on those with day-to-day operational control of aircraft.
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>GE will be in a position to comment more meaningfully on this question once there is greater certainty over the ICAO scheme that will be put forward for adoption at the 2016 ICAO Assembly. The principles/criteria set out in the response to question 4 above are indicative of GE's current high-level thinking on this issue.</p>
<p>Which options should be considered beyond 2020?</p>
<p>GE will be in a position to comment more meaningfully on this question once there is greater certainty over the ICAO scheme that will be put forward for adoption at the 2016 ICAO Assembly. The principles/criteria set out in the response to question 4 above are indicative of GE's current high-level thinking on this issue.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>EU legislation from 2021 onwards should recognize the importance of crafting appropriate exemptions. In addition to a suitable de minimis, GE continues to support appropriate exemptions that avoid administrative burden or complexity that is not proportionate to the emissions reduction benefits or conflicts with other key aims (e.g. safety). We recommend careful consideration of separate exemption of particular categories of flight, to support aviation safety, certification, innovation and improvement, including categorical exemptions for:</p> <ul style="list-style-type: none"> • flights taking off and landing at the same aerodrome (e.g. observation and demonstration flights); • ferry flights (e.g. delivery/collection of new/replacement aircraft or flights required exclusively to return aircraft for modification at a maintenance or storage facility). <p>Such exemptions would be consistent with encouraging the sector to adopt more efficient aircraft in a safe way and to increase deployment of sustainable fuels.</p>

Submit any other comments you may have.
Background on GECAS and GE Aviation can be found at: www.gecas.com and www.geaviation.com Roughly 38% of the world's commercial aviation fleet is leased. Aircraft leasing provides operators with flexibility to adapt to changing market conditions. GECAS would be pleased to provide further information regarding the leasing market and those considerations relevant to aircraft leasing in the EU ETS and any GMBM.
GE supports carbon policies that aspire to reduce emissions, specifically:
<ul style="list-style-type: none"> • encourage early adoption of cleaner technologies & energy efficiency; • reward R&D, innovation and private risk-taking; • encourage free flow of goods and ideas consistent with the WTO; • reflect national and local circumstances; • set realistic timetables for reductions with periodic reviews and updates in contributions as knowledge of the science evolves and technology improves. • Are flexible and dynamic, allowing for both reduced emissions but also growth for current and future operators.

19.

Name of the individual or organisation
Austrian Institute of Economic Research WIFO
Capacity in which the individual/organisation is completing Questionnaire
Academic/research institution
If your organisation is registered in the Transparency Register, please give your Register ID number:
408679621888-24
Please give your country of residence/establishment
Austria
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
In the European Union (EU) as well as world-wide, air traffic has been growing considerably in the long run. Between 2008 and 2014, the number of air passengers has increased by almost 10% in the EU. Since 1990, carbon emissions from aviation have doubled. They now account for about 3% of the EU's total greenhouse gas emissions, being to a large part caused by international flights. Recent forecasts predict a considerable expansion of air traffic in the EU also for the future: carbon emissions as well as the number of flights are expected to grow by 45% each between 2014 and 2035. Therefore international aviation needs to be included into decarbonisation efforts. In particular, the various tax exemptions international aviation is enjoying (with regard to value added and mineral oil tax) need to be phased out.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Considering the insufficient coverage of carbon emissions from air traffic by the EU Emission Trading System (grandfathering of the large majority of certificates which implies that 85% of emissions from commercial aviation are not covered by the ETS) alternative price-based instruments to curb carbon emissions from air traffic are required at least in the medium term. While it may be less environmentally effective than a fuel tax, a carbon-based flight ticket tax has one crucial advantage: it is not outlawed by international agreements such as the Chicago Convention, which refers to the taxation of fuel but not to the taxation of carbon emissions. Thus, given the current political and legal situation a European carbon-based ticket tax has better chances of implementation compared to a tax on aviation fuel and is therefore a financial instrument which could foster sustainable growth in the very near future.

20.

Name of the individual or organisation
KLM Royal Dutch Airlines
Capacity in which the individual/organisation is completing Questionnaire
Private enterprise
Please indicate the sectors your organisation represent
Commercial Aviation
If your organisation is registered in the Transparency Register, please give your Register ID number:

KLM R277836132
Please give your country of residence/establishment
Netherlands
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
<p>Since 2009, the aviation sector has a common set of goals on climate action and is meeting these goals:</p> <ul style="list-style-type: none"> -1.5% per year average fuel efficiency increase until 2020 -Stabilising net CO2 emissions from 2020 -Halving the net CO2 emissions by 2050, compared to 2005 <p>These targets are ambitious and robust, particularly for a sector that is growing to meet the needs of the world's economies and society</p> <p>The industry has a strategy in place to meet our climate action obligations through:</p> <ul style="list-style-type: none"> -investing in new technology -implementing better operational performance -implementing innovative infrastructure efficiencies -developing sustainable alternative fuels (Industry needs incentives/recognition that related CO2 savings will count) -pushing for GMBM at ICAO <p>AF/KL and the aviation industry make a strong call on Governments to reach an agreement on a GMBM to address aviation emissions at global level and to replace the unilateral European system, EU ETS for aviation, with the GMBM</p>
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<p>The Assembly must adopt a GMBM scheme with key design elements such as allocation of offset obligations per operator, potential provisions for differentiation at route-level (phase-in), initial guidance for monitoring reporting & verification (MRV), requirements and eligibility of emissions units</p> <p>The scheme should respect following criteria: environmental integrity, transparency, simplicity, no extra administration or cost burden for the operators</p> <p>On the distribution of obligations a high level of collective share is more likely to be accepted by a majority of ICAO States. It would also ensure simplicity of the system as no further adjustments would be necessary, and would also minimize market distortion</p> <p>The provisions for differentiation should not create undue market distortion. For the exempted flights all operators on the same route must be treated equally irrespective of the State of origin Exempted emissions should not be redistributed to operators subject to the scheme</p>
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
<p>Implementation of the GMBM should make existing and new economic measures to be applied to international aviation emissions on a regional or national basis unnecessary. Following this logic, AF/KL's expectation is that the ICAO GMBM will replace the aviation ETS in Europe. To address emissions from domestic aviation, national policies should first concentrate on the deployment of sustainable alternative fuels, the implementation of optimized procedures and the provision of infrastructure.</p> <p>Although domestic aviation is beyond the scope of the GMBM in ICAO; If a State considers to apply any kind of market-based measure to domestic flights, the measure should be aligned and compatible with the GMBM to the greatest extent possible and/or eventually include the domestic flights in the GMBM with the aim to avoid regulatory fragmentation and to minimize the administrative burden for operators and potential market distortions.</p>
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
<p>The priority must be the implementation and MRV of the GMBM and completion of the work in ICAO. During the EU ETS review the legislator should ensure the competitiveness of European carriers and avoid adverse financial and political implications The aviation ETS should be amended to provide for an appropriate transition mechanism to ensure that operators will not be regulated twice with separate, overlapping measures and a duplication of administrative obligations</p> <p>As operators should be equally treated on the same route, no regional model decided by a group of countries or a country can come in addition on an international route already covered by the GMBM. To that extent, GMBM shall replace aviation EU-ETS as soon as possible</p> <ul style="list-style-type: none"> -first, "stop the clock" shall be extended up to 2020 or the decided pre-implementation phase of the GMBM -then, GMBM shall fully substitute to aviation EU-ETS starting no later than 2020

Many States and industry stakeholders oppose unilateral measures
Which options should be considered for the EU ETS for the period 2017-2020?
The adoption of Regulation 421/2014 has contributed to creating a positive setting for negotiations in ICAO. An extension of the application of Reg. 421/2014 for the period 2017-2020 would have a similarly beneficial effect and avoid any political distractions from the remaining tasks (e.g. finalization of MRV requirements in ICAO, adoption of national legislation to implement the GMBM). Experts from the European Commission and EU Member States will have a key role to play in contributing to ICAO's remaining work on the operationalization of the GMBM. For the period 2017-2020, the same scope as today (i.e. intra EU flights only) should be considered ("stop the clock") to aviation EU-ETS, as long as the GMBM has not set agreed targets on international aviation and started with its pre-implementation phase on MRV.
Which options should be considered beyond 2020?
The single GMBM should make existing and new economic measures to be applied to international aviation emissions on a regional or national basis unnecessary. Following this logic, AF/KL's expectation is that the ICAO GMBM will fully replace the aviation ETS in Europe and all international flights to/from airports in the EEA should be subject exclusively to the GMBM. AF/KL recognizes that domestic aviation is beyond the scope of the GMBM in ICAO; should a State consider to apply any kind of market-based measure to domestic flights, the measure should be aligned and compatible with the GMBM to the greatest extent possible and/or eventually include the domestic flights in the GMBM with the aim to avoid regulatory fragmentation and minimize the administrative burden for operators and potential market distortions.
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
Please see above, no element of the EU ETS should be considered if and when ICAO agrees on a GMBM. The general EU ETS will continue to be applicable to stationary installations whilst aviation will be covered at global level through the GMBM.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Insofar as small operators are subject to EU ETS, the prolongation of existing exemptions are appropriate to avoid placing a disproportionate administrative burden on operators that only account for a very small quantity of CO2 emissions. Also the treatment of small operators under the GMBM and EU ETS should be aligned to the maximum extent possible.

21.

Name of the individual or organisation
Finnish Association for Nature Conservation
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus
Finnish Association for Nature Conservation is the main environmental organisation in Finland. We also host the International EKOenergy secretariat
If your organisation is registered in the Transparency Register, please give your Register ID number:
73282515553-33
Please give your country of residence/establishment
Finland
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
The aviation sector is responsible for 3-5% of global greenhouse gas emissions. These are expected to triple by 2050 unless action is taken. Therefore: <ul style="list-style-type: none"> · The proposed 2020 carbon neutrality goal under ICAO must be increased in line with the long-term goals agreed in Paris; · ICAO policies must not in any way limit more ambitious policies by states and regions;

<ul style="list-style-type: none"> Reductions should be achieved in the sector itself: Emissions from flights that start or end in the EU must not be compensated with carbon offsets from other sectors; Aviation must raise revenue to contribute to climate finance; The CO₂ emissions from aviation must be subject to a multiplier of at least two as the total climate impact of aviation is 2-5 times higher than its CO₂ emissions alone; Since no global cap on aviation emissions is currently in place, the ETS must start operating again in its full scope in 2017.
<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p>
<p>A legally binding agreement that comes into force in 2021 that includes:</p> <ul style="list-style-type: none"> All air travel from one country to another. To ensure equity, routes between developed countries should be subject to more ambitious climate policies. A substantial increase of the proposed 2020 carbon neutrality goal in line with the long-term goals agreed in Paris. A provision encouraging states to take additional measures and greater ambition. Ambitious in-sector reduction targets: No compensation through carbon offsets from other sectors. A multiplier of at least two on CO₂ emissions from aviation, as the total climate impact of aviation is 2-5 times higher than its CO₂ emissions alone. Proper accounting of all warming effects including for alternative fuels.
<p>In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?</p>
<p>An ICAO agreement should be seen as a floor for ambition, not a ceiling. Nothing in the Assembly Resolution should prohibit states to implement more ambitious measures. States must be able and encouraged to establish their own more ambitious emissions caps for the aviation sector.</p> <p>Since an ICAO agreement will only cover international travel (departing in one state, arriving in another), countries must establish caps for domestic aviation emissions in line with the long-term goals agreed in Paris.</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>Combined ICAO and EU action must ensure emissions reductions in line with the long-term goals agreed in Paris. The EU must set aviation sector targets in line with Paris if ICAO establishes a GMBM:</p> <ul style="list-style-type: none"> that is not legally binding without a higher target than 2020 carbon neutrality weak accounting rules based on offsetting and not on in-sector reductions. <p>The ETS must start operating again in its full scope in 2017. From 2021 the ETS must cover all inner-EU flights and 50% of all international flights:</p> <ul style="list-style-type: none"> Aviation must be subject to the same 2030 target as all other ETS sectors; Emissions from flights that start or end in the EU must not be offset with carbon credits from other sectors; No free ETS allowances to the aviation sector from 2017 onwards. Auctioning revenues must be earmarked for the Green Climate Fund; 2030 ETS target must be raised significantly (to bring it in line with Paris Agreement)
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>The Stop the Clock provision was implemented in order to grant ICAO more time to negotiate a GMBM. Since no GMBM is currently in place, the ETS must start operating again in its full scope in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by the Paris outcome.</p>
<p>Which options should be considered beyond 2020?</p>
<p>From 2021 onwards, the ETS must cover all inner-EU flights and 50% of all outgoing and 50% of all incoming international flights:</p> <ul style="list-style-type: none"> Aviation must be subject to the same 2030 target as the other ETS sectors; No free ETS allowances must be given to the aviation sector from 2017 onwards and its auctioning revenues must be earmarked for the Green Climate Fund; Emissions from flights that start and/or end in the EU must not be compensated with international carbon offsets; The ETS target must be brought in line with the Paris Agreement. Therefore the currently proposed 2030 ETS target of minus 43% below 2005 levels must be raised significantly.
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>

<p>The Stop the Clock provision was implemented in order to grant ICAO more time to negotiate a GMBM. Since no GMBM is currently in place, the ETS must start operating again in its full scope in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by the Paris outcome.</p> <p>From 2021 onwards, the ETS must cover all inner-EU flights and 50% of all outgoing and 50% of all incoming international flights:</p> <ul style="list-style-type: none"> · Aviation must be subject to the same 2030 target as the other ETS sectors; · No free ETS allowances must be given to the aviation sector from 2017 onwards and its auctioning revenues must be earmarked for the Green Climate Fund; · Emissions from flights that start and/or end in the EU must not be compensated with international carbon offsets; · The ETS target must be brought in line with the Paris Agreement. Therefore the currently proposed 2030 ETS target of minus 43% below 2005 levels must be raised significantly.
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>Fuel taxation and/or VAT is a more effective measure for small operators since there are fewer or no legal barriers to such policies for small non-commercial aircraft.</p>
<p>Submit any other comments you may have.</p>
<p>ICAO significantly lacks transparency and therefore breaches the Aarhus convention. Transparency has to be increased substantially to ensure any agreement reached by ICAO reflects the needs and voices of civil society. The recently agreed ICAO CO2 standard fails to reduce emissions from the sector. The EU must provide complementary measures - fuel taxation, VAT, improved efficiency standards etc.</p> <p>Currently the EU does not speak with a unified voice at ICAO meetings. This significantly weakens the EU's impact and undermines a push for strong climate action in the aviation sector. The EU should negotiate at ICAO in a unified single voice that advocates for strong climate action in line with the Paris Agreement.</p> <p>Handing out 85% free ETS allowances, perpetuating the fuel tax exemption and VAT exemption for aviation while charging buses and trains disproportionately favors a more climate damaging mode of transportation.</p>

22.

<p>Name of the individual or organisation</p>
<p>EUROPEAN EXPRESS ASSOCIATION (EEA)</p>
<p>Capacity in which the individual/organisation is completing Questionnaire</p>
<p>International organisation</p>
<p>If your organisation is registered in the Transparency Register, please give your Register ID number:</p>
<p>1894704851-83</p>
<p>Please give your country of residence/establishment</p>
<p>Belgium</p>
<p>Please indicate your preference for the publication of your response on the Commission's website</p>
<p>Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication</p>
<p>Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?</p>
<p>EEA, in common with other aviation Associations fully understands the need to reduce aviation's environmental footprint. The global industry has set itself ambitious emissions-reduction goals. These include stabilising net aviation emissions at 2020 levels by means of carbon-neutral growth, as well as halving the sector's net CO2 emissions by 2050, compared to a 2005 baseline. To achieve these ambitious environmental goals, the industry pursues a four-pillar strategy that consists of technology improvements, more efficient aircraft operations, infrastructure improvements and a single GMBM. In light of the above, we expect that the adoption and implementation of the ICAO global solution (GMBM) will replace the EU ETS currently applicable to all flights within the European Economic Area . We are confident that the EU ETS legislation can be amended to provide for an appropriate transition mechanism to ensure that operators are not subject to a double scheme.</p>
<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p>
<p>An ICAO GMBM should be a cost effective and non-discriminatory mandatory offsetting scheme covering international air services. It should limit exemptions/exceptions to the minimum so as to preserve its environmental integrity and provide equal non-discriminatory treatment of all operators (regardless of nationality) operating services on common routes and on all routes to/from an exempted State. The industry emission baseline should be established upon average annual emissions over a three-year period (say 2018-2020) to avoid any risk of a single reference year that may, for various reasons, not be representative (for example a reduction in aviation activity due to circumstances beyond the control of the industry). While</p>

<p>preserving its environmental objectives, it should be designed to permit implementation simplicity, avoiding unnecessary and costly administrative burdens for both operators and States.</p>
<p>In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?</p>
<p>CO2 emissions do not come with “domestic” or “international” labels and each unit of CO2 has the same potential climatic impact. It follows therefore that, subject to an impact assessment, both should be treated in exactly the same way. This would appear to dictate that a measure covering CO2 emissions from domestic services should mirror the ICAO GMBM thereby ensuring commonality of elements such as MRV, allocations, and offset requirements etc so as not to place any conflicting or differing requirements on operators. If implemented however, any domestic scheme must be subject to the requirement mentioned above, viz “It must avoid any double counting of emissions through other local/regional schemes or measures (including environmental taxes and charges which should be withdrawn, or future implementation prevented, as a result of the adoption of a GMBM).”</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>The main objective of the review of the EU ETS following the adoption of a GMBM at the ICAO Assembly must be to replace the EU ETS with legislation adopting that ICAO agreement. Failure to do so would place EU operators in an unacceptable (and potentially costly) position being subject to separate, overlapping and differing obligations.</p> <p>Since operators (and States) will need to put in place (and test) the procedures necessary to comply with the GMBM long before its actual introduction, it is our firm view that the existing intra-EU ETS should be terminated well before the GMBM comes into effect. Such action would not only be consistent with the principles proposed for inclusion in the ICAO Resolution but would also end the existing discriminatory situation in which operators of intra-EU services are unduly penalised. Such action would also provide business and investment certainty for operators.</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>As noted above, it is our view that on the assumption of ICAO’s adoption of a GMBM the existing intra-EU ETS should be terminated well before the GMBM comes into effect, for the above stated reasons.</p> <p>In the hopefully unlikely event of ICAO’s failure to adopt such a measure, this would present a whole new situation which would need extremely careful consideration, particularly in view of the international reaction to the terms of the original EU aviation ETS. Exactly how this might be handled will ultimately depend on exactly what transpires during the Assembly and it would be premature to now comment on the options that might be considered. It is however our position that re-establishment of a discriminatory intra-EU only aviation ETS as currently in place should not be an option for consideration.</p>
<p>Which options should be considered beyond 2020?</p>
<p>Assuming ICAO agreement, no other options for international aviation CO2 emissions should be considered for the reasons set out above. MBMs are however simply one of a basket of measures, with the majority of reductions coming from the three remaining ICAO pillars. In addition we would urge a more rapid movement of the Single European Sky from a long standing concept to genuine and effective reality by removing state protectionism of airspace, reducing duplication of services, fully implementing the EU performance scheme, breaking the monopoly provision of ATM and taking advantage of economies of scale by securing funding for SESAR projects’ solutions. We would also suggest that specific and stringent requirements be imposed on States to invest the revenues which may accrue from any future MBM on R&D projects aimed at improving the green credentials of aviation and that any future MBM should be accompanied by a requirement for general decrease in the in the level of environmental charges</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>Stationary installations and aircraft operators are not in competition under the EU ETS, neither is the former subject to the numerous other regulations and requirements placed on aircraft operators. We do not see either the logic or requirement for the “better alignment of the rules applicable to aviation and stationary installations”.</p> <p>The international nature of aviation means that EU aircraft operators are in competition with other operators on a global basis, hence the need for non-discriminatory treatment when compared not only to each other but also to operators from third countries. This principal of non-discrimination must be paramount in any GMBM or, in the absence of a global agreement, any local/regional MBM. Unlike noise which is local in character, CO2 emissions have a global impact and operators on intra-EU routes must be subject to common rules with their 3rd country counterparts operating other routes.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to</p>

<p>be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>The relatively greater administrative burden both on small emitters and their administrating authorities is seemingly recognised in the ICAO discussions towards a GMBM. Assuming a successful outcome at the Assembly it is therefore likely that this will be reflected in the final agreement, although at what emission level remains to be determined. A simpler compliance methodology for small emitters is also likely to emerge. We would see no objection to either of these issues which would then be incorporated into the EU measure adopting the ICAO GMBM.</p>
<p>Submit any other comments you may have.</p>
<p>Over its fairly limited lifespan, the aviation elements of the EU ETS have been subject to many regulatory changes which have caused great uncertainty and had undoubted detrimental effects on operators planning and investment. While cited as a market based measure there has been unwanted and unwarranted interference with elements which should have been market driven (including artificial manipulation of unit costs) and which have effectively served to disqualify it as “market based”. As operators we look forward to a period of stability under a global measure which will provide a degree of planning and investment certainty which has been sadly lacking. In relation to the debate in ICAO, many Associations such as our own have no direct involvement with ICAO and have relied on feedback from the Commission on progress and, crucially, on European objectives. We therefore call for more effective stakeholder involvement in the future which can only be of benefit to all concerned.</p>

23.

<p>Name of the individual or organisation</p>
<p>Association of European Airlines</p>
<p>Capacity in which the individual/organisation is completing Questionnaire</p>
<p>Professional organisation</p>
<p>Please indicate the sectors your organisation represents</p>
<p>Airlines</p>
<p>Where is your company located?</p>
<p>Belgium</p>
<p>If your organisation is registered in the Transparency Register, please give your Register ID number:</p>
<p>78089286892-19</p>
<p>Please give your country of residence/establishment</p>
<p>Belgium</p>
<p>Please indicate your preference for the publication of your response on the Commission's website</p>
<p>Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication</p>
<p>Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?</p>
<p>The global industry has set itself ambitious goals: fuel efficiency of 1.5% per year from 2010, stabilising net aviation emissions at 2020 levels through carbon-neutral growth as well as halving the sector's net CO2 emissions by 2050 compared to a 2005 baseline. To achieve these goals, the industry pursues a four-pillar strategy that consists of technology, more efficient operations, infrastructure improvements (e.g. Single European Sky) and a Global Market Based Mechanism.</p> <p>Aviation emissions are a global issue which require a global solution. AEA therefore strongly supports the ICAO process to develop a market-based measure for aviation to be applied from 2020. A global solution offers the best prospects for ensuring sustainability in the long term. As any modifications to the EU/ETS following the outcome of the ICAO Assembly would apply from January 2017, AEA insists that a decision regarding any such changes is taken as soon as possible after an agreement on a global scheme.</p>
<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p>
<p>AEA supports mandatory offsetting. It is the quickest to implement, the easiest to administer and the most cost-efficient, while at the same time maintaining environmental integrity. There should be an equitable balance between a collective ‘emissions share’ element and an individual post-2020 ‘growth’ element. Measures to address the SCRC of States (including a route-based approach) must avoid market distortion. Exempted emissions should not be redistributed to participating airlines.</p> <p>With regard to MRV, any new standard should respect the following criteria: environmental integrity; transparency; simplicity; no extra burden for airlines. The MRV system should distinguish between sustainable alternative fuel and fossil kerosene: sustainable alternative fuels should be exempted from a carrier's obligation, based on the “buy and claim” principle. There should also be incentives to develop such fuels. It would also be necessary to review the scheme on a regular basis.</p>
<p>In what ways could action being taken by countries and groups of countries to achieve their respective climate</p>

<p>goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?</p>
<p>As all emissions, whether international or domestic, have an identical impact, AEA believes that in order to ensure a level playing field and limit administrative burden States should collectively opt to include domestic flights in the GMBM. Existing regional schemes capture fewer emissions than the expected global solution. Besides, a patchwork of parallel, competing and conflicting regional/national schemes and GMBM would inevitably result in competitive distortions and unnecessary administrative complexity for operators.</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>The adoption and implementation of a GMBM should lead to the replacement of the EU ETS legislation currently applicable to the aviation sector as soon as the global scheme is implemented. The transition to the GMBM must be designed in a way that avoids double counting.</p> <p>Appreciating that ICAO will deliver on its ambition to agree on a GMBM, there would no longer be any need for an EU ETS, in whatever form or scope. In reviewing the system, the EU would have to decide to abandon the EU ETS all together and focus implementation and MRV of the GMBM.</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>It makes sense to use and maximise the period 2017 – 2020 to prepare for full implementation and MRV of the GMBM from 2020 onwards and abolish the EU ETS all together from 2017 onwards. It is much more effective from an environmental point of view to have a well-functioning GMBM in 2020 than to run the risk of re-introducing distortions of competition and increasing the administrative complexity and burden of such an ‘in-between system’.</p>
<p>Which options should be considered beyond 2020?</p>
<p>If ICAO agrees on and delivers a GMBM, please see the answers above.</p> <p>However, should the situation at ICAO level change and/or should the European legislator consider a continuation of the aviation ETS after 2020, AEA and its member airlines expect to be consulted separately and at every stage.</p> <p>Furthermore, we would also request a robust impact assessment which takes into consideration the competitiveness of European airlines before any changes to the existing parameters of the aviation ETS are considered and introduced, including the introduction of more stringency. In addition, the impact assessment should take into account developments at international level, and more specifically within ICAO.</p> <p>Moreover, the EU would need to take into account the fact that considerable international pressure led to the introduction of the stop the clock in the first place. It would be ineffective, inefficient and politically unwise for the EU to leave itself open to such a situation again.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>Please see above. No element of the EU ETS should be considered if and when ICAO agrees on a GMBM. The general EU ETS will continue to be applicable to stationary installations whilst aviation will be covered at global level through the GMBM.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>A solid analysis should be undertaken to find an appropriate de-minimis rule, balancing administrative simplicity and environmental credibility. Also, alternatives such as a phased-in approach for other operators or obligations to register and inform should be taken into account.</p>

24.

<p>Name of the individual or organisation</p>
<p>Air Berlin PLC & Co. Luftverkehrs KG</p>
<p>Capacity in which the individual/organisation is completing Questionnaire</p>
<p>Private enterprise</p>
<p>Business sectors</p>
<p>Aviation - Airline</p>
<p>If Private Enterprise</p>
<p>Yes - medium-sized enterprise</p>
<p>If your organisation is registered in the Transparency Register, please give your Register ID number:</p>
<p>60772936647-87</p>

Please give your country of residence/establishment
Germany
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
<p>The Paris Agreement is a bridge towards the objective of climate-neutrality before the end of the century. The aviation industry is already committed to carbon neutral growth from 2020. The legitimate aspirations of world economies in terms of trade, investment and tourism must be accompanied by efforts in all industrial sectors to reduce emissions. Aviation supports 60 million jobs, a third of global trade and half of all international tourists. While continuing to these benefits, the industry must address its CO2 emissions in line with what is economically reasonable and technologically feasible.</p> <p>As aviation is a globally functioning industry, only global market based mechanisms will be successful in tackling CO2 emissions.</p> <p>Airberlin therefore makes a strong call on Governments to reach an agreement on a global market-based measure (GMBM) to complement technology, operational and infrastructure measures and to cap net CO2 emissions from international aviation at 2020 levels.</p>
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<p>The 2016 ICAO Assembly must reach an agreement on the key design elements of the GMBM, including initial guidance for monitoring, reporting and verification (MRV) requirements as well as for the eligibility of emissions units.</p> <p>Key design elements of the GMBM to be agreed include potential provisions for differentiation at route-level (phase-in), allocation of offset obligations at operator level and technical exemptions (i.e. potential adjustments for specific categories of operators). Offsets should not be limited to geographical or sectorial specifications. This creates a dynamic and global market for aviation offsets.</p>
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
<p>Implementation of the GMBM should obviate the need for existing and new economic measures to be applied to international aviation emissions on a regional or national basis.</p> <p>To address emissions from domestic aviation, national policies should concentrate on reducing the regulatory burdens for airlines so that they are able to invest in CO2 efficient technology.</p>
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
<p>airberlin believes that the priority must be the implementation of the GMBM and completion of the work in ICAO. We would be concerned, if the EU-ETS was reintroduced on flights between the EEA and third countries. Other ICAO Member States would perceive this as a step back from the agreement to be reached. We expect that the adoption and implementation of the ICAO GMBM must replace the EU-ETS legislation currently applicable to all flights within the EEA. Intra-EU flights between member states should generally be considered as international flights.</p> <p>We are confident that the EU ETS legislation can be repealed to provide for an appropriate transition mechanism to ensure that operators currently subject to the EU ETS will not be regulated twice with separate, overlapping measures and a duplication of administrative obligations.</p> <p>To support the results of ICAO negotiation and to avoid market distortions for European airlines however, the best solution would be to fully repeal EU-ETS.</p>
Which options should be considered for the EU ETS for the period 2017-2020?
<p>The adoption of Regulation 421/2014 has contributed to creating a positive setting for negotiations in ICAO. An extension of the application of Reg. 421/2014 for the period 2017-2020 would have a similarly beneficial effect and avoid any political distractions from the remaining tasks (e.g. finalization of MRV requirements in ICAO, adoption of national legislation to implement the GMBM). This is particularly important as, in the period 2017-2020, experts from the European Commission and EU Member States will have a key role to play in contributing to ICAO's remaining work on the operationalization of the GMBM. It should be noted that many States and industry stakeholders have agreed to support the GMBM but only on the premise that it would prevent the introduction of unilateral measures for international aviation. To support the results of ICAO negotiation and to avoid market distortions for European airlines however, the best solution would be to fully repeal EU-ETS for this period.</p>
Which options should be considered beyond 2020?
<p>The Implementation of the GMBM should obviate the need for existing and new economic measures to be applied to international aviation emissions on a regional or national basis. Therefore, all international flights to/from airports in the EEA should be subject exclusively to the GMBM and removed from the scope of the EU ETS.</p>

While domestic flights are beyond the scope of the GMBM, any regulative measures applicable to domestic flights should be aligned and made compatible with the GMBM to avoid regulatory fragmentation and to minimize the administrative burden on operators and potential market distortions.
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
The Implementation of the GMBM should obviate the need for existing and new economic measures to be applied to international aviation emissions on a regional or national basis. Insofar as EU ETS requirements would continue to apply to domestic aviation, any change to the rules applicable to the allocation or auctioning of allowances should not adversely affect the financial situation of domestic and regional carriers, something which should be duly considered and thoroughly assessed. Trading of offsets is already part of the EU-ETS and it should be therefore possible to apply them to the new single global market mechanism on ICAO level.

25.

Name of the individual or organisation
Quercus - Associação Nacional de Conservação da Natureza
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus
Quercus is a Portuguese environmental NGO, working also on transport and climate change policies, in coordination with EU NGOs that is part, like T&E, EEB, CAN-Europe and ECOS.
If your organisation is registered in the Transparency Register, please give your Register ID number:
269613521588-12
Please give your country of residence/establishment
Portugal
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
Emission reductions should be driven at both ICAO & EU level. Aviation should pay for all external costs, not just those above 2020 levels. In-sector reductions have to be promoted, e.g. by incentivising technology & operations improvements. ICAO's CO2 standard contributes nothing towards this and has perverse effects. The EU should fix or abolish. As well as ending fuel tax & state aid subsidies, demand management, VAT & ticket taxes should be introduced. Routes between developed countries should have more ambitious reduction goals. Increase ambition over time in line with the 1.5 ^o Paris goal. EU measures should rely on domestic reductions, not on international credits which in ICAO must comply with strict quality criteria in line with the SDGs & the Paris commitment to no double-counting. EU should reject US/ICAO's attempts to constrain ambitious policies at state/regional level. Aviation will continue to drive climate change; the sector must contribute to climate finance.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
The Assembly Resolution must deliver an environmentally effective GMBM, i.e. true Carbon Neutral Growth 2020 (CNG2020) from 2021. A large emissions gap as at present is a showstopper. EU must ensure developed states/airlines MUST do more. It should set strict and mandatory criteria for emission units that comply with common social and environmental standards. All credits that are listed as lacking environmental integrity should be excluded. ICAO must commit to strengthen measures beyond CNG2020 at each review and encourage ambitious states to go further. An early MRV start is imperative. To avoid double-counting, stringent and environmentally sound accounting and MRV rules for alternative fuels and offset credits, linked to UNFCCC accounting rules, should be put in place. ICSA developed an exhaustive checklist to ensure an effective GMBM. ICAO needs to start work on non-CO2 emissions.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
The GMBM should be a floor for ambition, not a ceiling. States, as a group or on a bilateral basis, should be empowered and encouraged to use the GMBM to increase ambition through e.g. discounting, including non-

<p>CO2 emissions, increasing ambition on route groupings such as the Atlantic. A single global MRV provides administrative simplicity for operators, but the environmental integrity of the MRV needs to be high, otherwise states will deviate. ICAO and UNFCCC registries should be coupled to avoid double-counting. Nothing in the Assembly Resolution should prohibit states to implement more ambitious measures (such as addressing non-CO2 emissions, addressing emissions below CNG2020, stricter standards). All Annex I countries, especially the USA, should make domestic aviation cuts in line with Paris Agreement. Parallel policies should be applied as appropriate, such as taxation, phase outs, technological standards, operational measures, etc.</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>Combined ICAO & EU action should ensure a fair contribution to the 1,5° limit. Since early action is crucial, all aviation emissions from/to Europe should be covered. Stop the Clock is prejudicial. The Directive says that emissions from international flights to/from the EU should be fully covered from 2017 onwards. The combination of ICAO & EU measures must meet the EU 2030 reduction goal. Therefore, the share of emissions to be covered by the EU ETS from 2020 should be determined after the 2019 ICAO Assembly. The EU ETS must fill the ambition gap between the EU 2030 goal and the ICAO target, taking into account whether the ICAO ambition will be increased prior to 2030, as well as any gap in environmental integrity between EU ETS allowances and ICAO international credits. The EU should ensure a level playing field between transport modes in the single market. As other EU sectors cannot use international credits for ETS compliance, this option should not be accepted for aviation.</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>Regulation 421/2014 stipulates that from January 1, 2017, the EU ETS should cover all emissions from international flights from or to the EU. In the absence of other emissions trading systems for international aviation, other equivalent measures, or certainly if ICAO's ambition falls short – as things currently stand is surely will – , this provision should remain untouched. Early action is essential. Stop the Clock has already given ICAO 5 years.</p>
<p>Which options should be considered beyond 2020?</p>
<p>The scope (routes) covered by the EU ETS should depend on a review of ICAO GMBM ambition and on measures implemented by other countries. EU ambition must achieve the 2030 -40% objective taking into account what ICAO does. Since the ETS has proven to be an effective method of reducing emissions, the intra-EU aviation ETS must be retained. The cap must be consistent with the 2030 goal and be subject to the common linear reduction factor. All allowances should be auctioned. Non-CO2 can be addressed through a multiplier or by levying a charge. The EU ETS should address all emissions of inbound and outbound flights that are not covered by the ICAO GMBM to ensure Paris level ambition. International allowances and offsets should not be used for compliance with the EU ETS. Appropriate measures should be put in place to avoid double-counting. Since fuel tax & VAT exemptions and airport subsidies work at cross purposes to the ETS, they must be abolished.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>The EU ETS should exclude international offsets in order to avoid market distortions. The EU should aim for a single MRV aligning ICAO and EU requirements provided no loss of environmental integrity. Free allowances should no longer play a role within the EU aviation ETS since there is no carbon leakage. The aviation cap should be reduced in line with the Paris Agreement ambition. Stop the Clock has given ICAO 5 years and since no GMBM is currently in place, the EU ETS should revert to its full scope in 2017 as part of pre-2020 ambition required by the Paris Agreement.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>Small non-commercial aircraft operators could continue to be exempted from the EU ETS since fuel taxation and VAT are more effective measures and should be implemented. For small non-commercial aircraft there are fewer or no legal barriers to such policies.</p>
<p>Submit any other comments you may have.</p>
<p>The ICAO CO2 standard fails to reduce in-sector emissions. Reform it immediately or reject & replace by EU phase-outs. EU tolerance of ICAO's lack of transparency breaches Aarhus. The EU must reform ICAO and accept its sovereign responsibility to reduce EU departing flight emissions. Outsourcing EU aviation climate policy to Airbus and ICAO betrays EU's Paris commitments. EU should develop complementary policies to reduce emissions, eg, a fuel tax, VAT & ticket taxes, improved efficiency standards. An ETS with 85% free allowances combined with the fuel tax & VAT exemptions, while charging buses & trains and thus distorting competition, is simply self-defeating. MS and EC Vice-Presidents must take responsibility for these failures and start to address</p>

aviation in a joint way, not via silos where Directorates abrogate joint responsibility for addressing cross-cutting questions such as fuel tax, VAT or state aid scandals. Non-CO2 emissions must be taken seriously & measures prepared.

26.

Name of the individual or organisation
Austrian Federal Economic Chamber (AFCO) - Wirtschaftskammer Österreich (WKÖ)
Capacity in which the individual/organisation is completing Questionnaire
Professional organisation
Please indicate the sectors your organisation represents
All Austrian businesses (crafts and trades, industry, mining, finance, banking and insurance, transport, information and communication, broadcasting, tourism and leisure, as well as other services)
Where is your company located?
Austria
If your organisation is registered in the Transparency Register, please give your Register ID number:
10405322962-08
Please give your country of residence/establishment
Austria
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
AFCO supports the ICAO efforts and calls upon the Members States to agree on a globally applicable, ambitious and competitively neutral treaty. A CO2 offsetting scheme contrary to taxes and levies is the most practicable, efficient and easiest system to administer to address CO2 emissions, to secure environmental integrity and to mitigate climate change. Aviation industry has set itself ambitious goals to minimize CO2 emissions. They will be met through technical improvements of aircraft, propulsion (e.g. alternative fuels), operations and infrastructure. Additionally a Global Market Based Mechanism will be needed to enable the industry to reach the climate goals, contribute to environmental integrity and to prevent a patchwork of national/regional Systems.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Cost efficiency (e.g. EUC – Emissions Unit Criteria); administrative simplicity (MRV – Monitoring, Reporting and Verification); prevention of competitive distortions; equal treatment on same routes for operators; no redistribution of excepted emissions (e.g. routes); GMBM must be the sole, global mechanism to address CO2 emissions; no duplicative measures through national/regional systems (e.g. EU-ETS); prevention of a door opener clause within the ICAO agreement, which would allow a patchwork of different schemes and inappropriately burden european airlines
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
As a result of different geographical circumstances large states (e.g. USA, China, Australia) operate a high share of domestic flights, which would not be included within the GMBM system. As a result each state could implement national offsetting systems. Hence this could create market distortions, depending on the fact, if and where such national schemes will be established (e.g. EU-ETS).
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
European airlines will still be under additional burden from EU-ETS, unless ICAO Member States agree upon the GMBM treaty in the Sept./Oct. 2016 Assembly. Additionally a valuable contribution from aviation industry to climate change mitigation in a global context has to come into effect as soon as possible. ICAO Market Based Mechanism has to replace EU-ETS in aviation. A global system is the best option with regard to competitiveness and environmental integrity, furthermore European airlines may not be burdened twice. European cross-border flights have to be classified as international flights in terms of GMBM. A door opener clause for ETS within the treaty must be prevented in any case. A suitable framework for Transition from EU-ETS to GMBM must be ensured, which will not oblige aviation industry with different measures from various CO2 offsetting systems at the same time.
Which options should be considered for the EU ETS for the period 2017-2020?
See above.
Which options should be considered beyond 2020?
See above.

<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>ICAO Market Based Mechanism has to replace EU-ETS in aviation. A global system is the best option and could be the first step for a real global ETS (installations and aviation). Important is, that any unwarranted political interventions in the carbon market that would directly interfere with natural market dynamics and influence price or availability of emissions units must be avoided. Alternative Fuels must be taken into account and there may not be the same offsetting obligation for biofuels as implemented for traditional jet fuel. Concrete requirements, environmental integrity, transparency, avoidance of administrative and cost burden for operators must be the criteria for the MRV system.</p>

27.

Name of the individual or organisation
Thomas Cook Group
Capacity in which the individual/organisation is completing Questionnaire
Private enterprise
Business sectors
Thomas Cook Group plc is one of the world's leading leisure travel groups. The Thomas Cook Group Airlines consist of four airlines: TC UK, TC Belgium, TC Scandinavia and Condor Flugdienst.
If your organisation is registered in the Transparency Register, please give your Register ID number:
75615285927-45
Please give your country of residence/establishment
Germany
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
The Paris Agreement can be seen as a bridge between today's policies and the objective of climate-neutrality before the end of the century. The aviation industry is since 2009 already committed to carbon neutral growth from 2020. Economies around the world wish to foster and develop further the vital connectivity for trade, investment and tourism. These aspirations are legitimate but must be accompanied by efforts in all industrial sectors to reduce emissions. The industry must continue to provide benefits as e.g. 60 million jobs, particularly in the developing world, whilst at the same time addressing its CO2 emissions in line with what is economically reasonable and technologically feasible. We therefore make a strong call on Governments to reach an agreement on a global market-based measure (GMBM) to complement technology, operational and infrastructure measures and to cap net CO2 emissions from international aviation at 2020 levels.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
In TC Airlines' view, for the GMBM to take effect from 2020, the 2016 ICAO Assembly must reach an agreement on the key design elements of the GMBM, including initial guidance for monitoring, reporting and verification (MRV) requirements as well as for the eligibility of emissions units. We recognize that some outstanding work will need to be undertaken after the 2016 Assembly to allow the GMBM to become fully operational from 2020. Key design elements of the GMBM to be agreed include potential provisions for differentiation at route-level (phase-in), allocation of offset obligations at operator level and technical exemptions (i.e. potential adjustments for specific categories of operators).
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Implementation of the GMBM should obviate the need for existing and new economic measures to be applied to international aviation emissions on a regional or national basis. To address emissions from domestic aviation, we believe that national policies should first concentrate on the deployment of alternative propulsions and sustainable alternative fuels and the implementation of optimized procedures and infrastructure. Whilst recognizing that domestic aviation is beyond the scope of the GMBM, TC Airlines believe that any

market-based measures for domestic aviation should be aligned and compatible with the GMBM to the greatest extent possible with the aim to avoid regulatory fragmentation and minimize the administrative burden for operators and potential market distortions.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
TC Airlines believe that the priority must be the implementation of the GMBM and completion of the work in ICAO. We would be concerned that if EU ETS was reintroduced on flights between the EEA and third countries, other ICAO Member States would perceive this as a step back from the agreement to be reached in ICAO. We expect that the adoption and implementation of the ICAO GMBM must replace the EU ETS legislation currently applicable to all flights within the European Economic Area (EEA). We are confident that the EU ETS legislation can be suspended to provide for an appropriate transition mechanism to ensure that operators currently subject to the EU ETS will not be regulated twice with separate, overlapping measures and a duplication of administrative obligations. To support the results of ICAO negotiation and to avoid market distortions for European airlines however, the best solution would be to fully repeal EU-ETS.
Which options should be considered for the EU ETS for the period 2017-2020?
The adoption of Regulation 421/2014 has contributed to creating a positive setting for negotiations in ICAO. An extension of the application of Reg. 421/2014 for the period 2017-2020 would have a similarly beneficial effect and avoid any political distractions from the remaining tasks (e.g. finalization of MRV requirements in ICAO, adoption of national legislation to implement the GMBM). This is particularly important as, in the period 2017-2020, experts from the European Commission and EU Member States will have a key role to play in contributing to ICAO's remaining work on the operationalization of the GMBM. It should be noted that many States and industry stakeholders have agreed to support the GMBM but only on the premise that it would prevent the introduction of unilateral measures for international aviation. To support the results of ICAO negotiation and to avoid market distortions for European airlines however, the best solution would be to fully repeal EU-ETS for this period.
Which options should be considered beyond 2020?
The implementation of a single GMBM should obviate the need for existing and new economic measures to be applied to international aviation emissions on a regional or national basis. Therefore, all international flights to/from airports in the EEA should be subject exclusively to the GMBM and removed from the scope of the EU ETS. While domestic flights are beyond the scope of the GMBM, any regulative measures applicable to domestic flights should be aligned and made compatible with the GMBM to avoid regulatory fragmentation and to minimize the administrative burden on operators and potential market distortions.
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
The implementation of a single GMBM should obviate the need for existing and new regulative measures to be applied to international aviation emissions on a regional or national basis. Insofar as EU ETS requirements would continue to apply to domestic aviation, any change to the rules applicable to the allocation or auctioning of allowances should not adversely affect the financial situation of domestic and regional carriers, something which should be duly considered and thoroughly assessed.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Insofar as small operators are subject to EU ETS, we believe exemptions are appropriate to avoid placing a disproportionate administrative burden on operators that only account for a very small quantity of CO2 emissions. In general, the treatment of small operators under the GMBM and EU ETS should be aligned to the maximum extent possible.

28.

Name of the individual or organisation
WWF European Policy Programme
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of interest
WWF's ultimate goal is to stop the degradation of our planet, building a future in which humans live in

harmony with nature, ia. through promoting action to reduce pollution.
If your organisation is registered in the Transparency Register, please give your Register ID number:
1414929419-24
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
<p>WWF supports agreement on an Market Based Mechanism (MBM) in ICAO to ensure its CNG2020 goal is achieved. However, this support is entirely contingent on there being a mechanism in place to increase this goal over time in line with the long-term temperature goals of the Paris Agreement, just as Nationally Determined Contributions to the Paris Agreement are to be improved on a 5-yearly basis.</p> <p>Aviation must above all maximise fuel efficiency and shift from fossil fuel to sustainable alternative fuels (SAF). Any shortfall in efficiency improvements and SAF that can be sustainably supplied must be addressed through modal shift, demand moderation and/or economic measures.</p> <p>Additionally, efforts on international aviation must address the non-CO2 climate impacts of flying (including the effect of emissions at altitude) and such efforts must be made at all levels: national, regional and global.</p>
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<p>The 2016 Assembly Resolution must:</p> <ul style="list-style-type: none"> • Equitably distribute the CNG2020 goal between countries, ensuring its full achievement, and a process to strengthen the goal in line with the Paris Agreement • Effectively incentivise in-sector emissions reductions • Clearly signal that any emissions units and alternative fuels credited under the scheme must generate real emissions reductions while supporting sustainable development • Encourage additional action to address aviation's climate impacts <p>The following must be finalised well ahead of the 2019 Assembly:</p> <ul style="list-style-type: none"> • Clear, robust and transparent monitoring, reporting and verification (MRV) systems and registries, with support for implementation in countries that require capacity building • Binding standards for emissions units and alternative fuels credited under the scheme, to ensure they generate real emissions reductions while supporting sustainable development and ensuring no double counting. <p>See ICSA MBM Checklist http://bit.ly/1WBf9Ya</p>
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
<p>An ICAO agreement must be a floor for ambition, not a ceiling. The Assembly Resolution should encourage, and must not prohibit, more ambitious measures by states or groups of states.</p> <p>The EU will need to assess the contribution of the ICAO MBM to its own climate change targets, and where the MBM falls short, must introduce/maintain additional measures to achieve its own targets (in particular the aviation ETS). Since an ICAO agreement will only cover international flights (departing in one state, arriving in another), EU countries should establish caps for domestic aviation emissions in line with the long-term goals agreed in Paris. Countries must ensure that emissions reductions on internal flights are not claimed in the MBM and vice versa. This is very relevant when it comes to alternative fuels, as it is envisaged that both internal and international flights will use the same fuelling systems. Alternative fuel use on an internal flight must not contribute to the ICAO CNG2020 target.</p>
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
<p>In assessing the contribution of the ICAO MBM to EU climate action, the EU must ask:</p> <ul style="list-style-type: none"> • Will the MBM be legally binding? Are the MBM MRV rules and emissions unit criteria robust/enforceable? If not, the MBM is inadequate. • How far short of the EU's own climate ambition does the ICAO MBM fall? CNG2020 is below the EU's domestic level of ambition. Therefore, the EU will require additional measures to achieve its own ambition. • To what extent does the MBM rely on carbon offset credits? Bearing in mind that offset credits are phased out in the EU, and their current contribution to the climate targets subject to stricter controls. The MBM is expected to rely heavily on offsetting. Therefore, the EU will require additional measures to achieve its own ambition. <p>The stronger the ICAO MBM, the less action the EU and Member States will have to take domestically to achieve EU climate ambition. Therefore, it is in the EU's interests to push for the strongest possible outcome in</p>

ICAO.
Which options should be considered for the EU ETS for the period 2017-2020?
<p>The Paris Agreement and ICAO MBM will both come into effect in 2020. However, at current emissions levels the carbon budget for a strong likelihood (66%) of keeping warming below 1.5°C could be exhausted in as little as six years. With the current INDCs even the carbon budget for a 50% likelihood of keeping warming below 1.5°C will be exhausted by 2025.</p> <p>The Paris Agreement therefore clearly recognizes the need for enhanced mitigation actions in the period prior to 2020. Europe cannot afford the MBM to become too little too late.</p> <p>Therefore, the aviation EU ETS must start operating again in its full scope in 2017 (as stipulated by Regulation (EU) No 421/2014) as part of pre-2020 enhanced action required by the Paris Agreement.</p>
Which options should be considered beyond 2020?
<p>From 2021 onwards, the ETS should cover all intra-EU flights and 50% of all outgoing and 50% of all incoming international flights.</p> <p>The ICAO MBM may make a contribution towards the EU's climate objectives, reducing the effort required through the EU ETS, but only if it is consistent with EU law, and subject to satisfactory responses to the questions in section 4. The shortfall between ICAO's CNG2020 target and EU ambition must be effectively addressed. The EU ETS is the most appropriate measure for addressing this "ambition gap".</p> <p>Aviation should be subject to the same 2030 target as other ETS sectors. Additionally, no free ETS allowances should be given to the aviation sector from 2017 onwards, and its auctioning revenues should be earmarked for the Green Climate Fund.</p> <p>Finally, the ETS target must be brought in line with the Paris Agreement. Therefore the currently proposed 2030 ETS target of minus 43% below 2005 levels must be raised significantly.</p>
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
<p>EU climate policies are rightly focused on reducing the EU's own emissions, including those from international aviation, rather than relying on international offset credits. The EU should coordinate on implementation of the MBM's MRV and registry systems, and maintain the principle of not relying on international offset credits.</p> <p>Aviation should be subject to the same 2030 target as other ETS sectors. Additionally, no free ETS allowances should be given to the aviation sector from 2017 onwards, and its auctioning revenues should be earmarked for the Green Climate Fund.</p> <p>Finally, the ETS target must be brought in line with the Paris Agreement. Therefore the currently proposed 2030 ETS target of minus 43% below 2005 levels must be raised significantly.</p>
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Fuel taxation and/or VAT is a more effective measure for small operators since there are fewer or no legal barriers to such policies for small non-commercial aircraft.
Submit any other comments you may have.
<p>WWF welcomes efforts made by the EU to consult civil society, and participates in ICAO's Committee on Aviation Environment Protection (CAEP). However, CAEP's confidentiality procedures are excessive. They go far beyond the level of confidentiality required to protect commercial interests, and therefore significantly undermine the public interest. The EU should challenge CAEP for its consistency with the Aarhus Convention. Civil society has been excluded from the ICAO groups discussing differentiation. IATA, however, has been involved in these talks. Civil society has a key role to play in ensuring that differentiation proposals are equitable and consistent with the need for environmental integrity. Had ICAO included civil society in these talks, they would surely be much closer to agreement by now, and the current proposals would surely have a much greater degree of environmental integrity. The EU should champion the need for transparency and the role of civil society in such processes</p>

29.

Name of the individual or organisation
Fern
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus
Forests

If your organisation is registered in the Transparency Register, please give your Register ID number:
40538475090-82
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
The Paris agreement has limited increases in global average temperature to well below 2°C/1.5°C. Carbon budgets to help achieve these targets have been estimated; for a likely chance of reaching 1.5°C our total carbon budget in 2011 was 400MTCO ₂ . Since our carbon budgets are highly constrained, every sector needs to make a fundamental shift and get as close as possible to zero: the aviation sector cannot be an exception if the long-term goal in the PA is to be achieved. By 2100, there must be a balance between emissions and removals, which recognizes the role that forests play in sequestering CO ₂ . However, it is important to note that any removals of CO ₂ by sinks does not compensate for emissions of fossil fuels, since it takes millennia for CO ₂ to be fully removed from the atmosphere. For more information see: http://www.fern.org/sites/fern.org/files/fern-comment/Untangling%20the%20confusion%20around%20land%20carbon%20science%20and%20climate%20change%20mitigation%20policy.pdf
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Given how limited our carbon budget is, and how limited the possibility to sequester more CO ₂ from the atmosphere is, it is crucial that ICAO put forward a real plan to reduce emissions. In reality, this will also mean significantly reducing the total number of flights. Fern is critical of the plan to allow emissions to increase under the false pretense that these can be offset through emissions reductions in other sectors. Given how restrained our carbon budgets are, emissions reductions must be sought everywhere. Fern made this position clear by signing onto a letter to ICAO, available at www.fern.org/icao
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Nothing in the Assembly Resolution should prohibit states to implement more ambitious measures. Stop the Clock was implemented to give ICAO time to negotiate a GMBM. Since no GMBM is yet in place, the ETS must restart in its full scope in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by Paris.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
The principle criteria should be whether ICAO's GMBM puts the aviation sector on course to ensuring that the planet does not overshoot the carbon budgets estimated to keep within 2 Degrees and 1.5 degrees, paying careful attention to the fact that growing forests do not compensate for continued fossil fuel emissions.
Which options should be considered for the EU ETS for the period 2017-2020?
Reg 421/2014 stipulates that from January 1 2017, the EU ETS should cover all emissions from international flights into or out of the EU. In the absence of other emissions trading systems for international aviation, or other equivalent measures, during this period this provision should remain in force. No free ETS allowances should be given to the aviation sector from 2017.
Which options should be considered beyond 2020?
Any options considered should make sure they put the aviation sector in the EU on a pathway to ensuring global average temperatures do not increase beyond 1.5 degrees. If, as the Paris Agreement insists, that developing countries should be allowed to peak later than developed countries, this means that the EU must have reduce emissions by 90 per cent by 2030. The aviation sector must make comparable emissions reductions.
Submit any other comments you may have.
Fern was one of more than 80 organisations that issued a strong critique of ICAO's GMBM so far and called for more to be done to reduce emissions. Fern wishes to submit this open letter as part of this consultation, on behalf of those organisations. The letter is available here: www.fern.org/icao

30.

Name of the individual or organisation
AMADEUS IT GROUP S.A.
Capacity in which the individual/organisation is completing Questionnaire
International organisation
If your organisation is registered in the Transparency Register, please give your Register ID number:
193056815367-44
Please give your country of residence/establishment
Spain
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come

<p>from international aviation and how should this develop over time?</p> <p>It is fundamental to address the long-term goal through consensus among all parties involved. Since climate change is global by definition, it would make more sense to address it with global solutions, rather than with local, isolated initiatives. The responsibility for emissions reductions of each stakeholder should be set according to the principle of “common but differentiated responsibilities” and considering actions undertaken by early adopters before the date of reference for reduction.</p> <p>We believe that the efforts to reduce emissions should be taken at all possible levels and by all stakeholders involved. Such efforts should range from the implementation of new and more efficient technologies and co-operation between all different stakeholders including airlines, airport operators and ground handlers, and sharing information which could help improving operational efficiency and environmental performance.</p>
<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p> <p>We believe that GMBM should include mechanisms to reduce the unpredictability and volatility of the carbon price. This could be achieved by reviewing CO2 emission targets regularly and by adapting them to the evolution of external factors that influence the carbon price. By adapting emissions targets regularly, there would also be guarantee that the GMBM will achieve its objective of pushing stakeholders to reduce emissions, without being totally dependent on market prices.</p>
<p>In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?</p> <p>The GMBM should set a system by which national emission reduction actions are properly taken into account in order to avoid duplication of efforts and to take into consideration all the existing measures put in place prior to the implementation of the GMBM.</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p> <p>As explained in the answer to the first question, it is fundamental to establish one global framework through consensus among all parties involved. Since climate change is global by definition it would not make sense to address it with local solutions over the long term. The responsibility for emissions reductions of each stakeholder should be set according to the principle of “common but differentiated responsibilities” and considering actions undertaken by early adopters before the date of reference for reduction.</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p> <p>We believe that the options will depend on the outcome of the ICAO General Assembly of September 2016 and that they should be aligned with its results.</p> <p>It would be ideal to implement mechanisms to reduce the volatility of carbon prices so as to reduce uncertainty, facilitate planning from operators and encourage investments in low-carbon-emissions technologies.</p>
<p>Which options should be considered beyond 2020?</p> <p>We believe that if the ICAO’s GMBM is launched by 2020, the EU ETS should integrate seamlessly with it for the aviation sector.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p> <p>The GMBM should allow a mechanism for periodic reviews and adaptation of the targets according to external factors, such as air traffic growth or new low-carbon technologies (more efficient engines, lighter aircraft, use of biofuels, etc.) that seriously affect the achievement of the emission reduction objectives.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p> <p>Assuming that emissions from small non-commercial operators are marginal compared to commercial operations, it probably makes sense to leave small emitters exempted on a first phase and eventually include them once a significant progress has been achieved with the larger commercial operators.</p>
<p>Submit any other comments you may have.</p> <p>Amadeus, as a technology provider and transaction processor for the travel industry, processes more than two million air reservations daily. Capitalising on this privileged position, we foster environmental awareness among travellers by displaying in our distribution platforms the CO2 estimated emissions released as a consequence of flights. The emissions are displayed thanks to our agreement with the ICAO to use their carbon calculator as an industry standard.</p> <p>At Amadeus, we develop IT solutions that provide operational improvements for our customers, including environmental benefits related to reduced fuel consumption, greenhouse gas emissions, local pollution at</p>

airports and noise. These environmental benefits are mainly targeted for airlines and airports.

31.

Name of the individual or organisation
Bundesverband der Deutschen Luftverkehrswirtschaft e. V. (BDL) German Aviation Association
Capacity in which the individual/organisation is completing Questionnaire
Professional organisation
Please indicate the sectors your organisation represents
Aviation (airlines, airports, air traffic control and aviation service providers)
Where is your company located?
Germany
If your organisation is registered in the Transparency Register, please give your Register ID number:
76163986870-10
Please give your country of residence/establishment
Germany
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
<p>The Paris Agreement can be seen as a bridge between today's policies and the objective of climate-neutrality before the end of the century. Within this context, the aviation industry is since 2009 already committed to carbon neutral growth from 2020. Economies around the world wish to foster and develop further the vital connectivity for trade, investment and tourism that air transport brings. These aspirations are legitimate but must be accompanied by efforts in all industrial sectors to reduce emissions. Aviation supports around 60 million jobs, a third of global trade by value and half of all international tourists. The industry must continue to provide these benefits, particularly in the developing world, whilst at the same time addressing its CO2 emissions in line with what is economically reasonable and technologically feasible.</p> <p>BDL therefore makes a strong call on Governments to reach an agreement on a global market-based measure (GMBM).</p>
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<p>In BDL's view, for the GMBM to take effect from 2020, the 2016 ICAO Assembly must reach an agreement on the key design elements of the GMBM, including initial guidance for monitoring, reporting and verification (MRV) requirements as well as for the eligibility of emissions units. BDL recognizes that some outstanding work will need to be undertaken after the 2016 Assembly to allow the GMBM to become fully operational from 2020.</p> <p>Key design elements of the GMBM to be agreed include potential provisions for differentiation at route-level (phase-in), allocation of offset obligations at operator level, technical exemptions (i.e. potential adjustments for specific categories of operators) and the eligibility of emission units.</p> <p>Offsets should not be limited to geographical or sectorial specifications. This creates a dynamic and global market for aviation offsets.</p>
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
<p>Implementation of the GMBM should obviate the need for existing and new economic measures to be applied to international aviation emissions on a regional or national basis. To address emissions from domestic aviation, BDL believes that national policies should first concentrate on the deployment of alternative propulsions and sustainable alternative fuels and the implementation of optimized procedures and infrastructure.</p> <p>Whilst recognizing that domestic aviation is beyond the scope of the GMBM, BDL believes that any market-based measures for domestic aviation should be aligned and compatible with the GMBM to the greatest extent possible with the aim to avoid regulatory fragmentation and minimize the administrative burden for operators and potential market distortions.</p> <p>In 2013, Germany's domestic flights accounted for 0.25 per cent of total CO2 emissions in Germany and the emissions decline for years: since 1990, a reduction of 16 percent was achieved.</p>
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
<p>BDL believes that the priority must be the implementation of the GMBM and completion of the work in ICAO. We would be concerned that if EU ETS was reintroduced on flights between the EEA and third countries, other</p>

<p>ICAO Member States would perceive this as a step back from the agreement to be reached in ICAO. BDL expects that the adoption and implementation of the ICAO GMBM must replace the EU ETS legislation currently applicable to all flights within the European Economic Area (EEA). We are confident that the EU ETS legislation can be suspended to provide for an appropriate transition mechanism to ensure that operators currently subject to the EU ETS will not be regulated twice with separate, overlapping measures and a duplication of administrative obligations.</p> <p>To support the results of ICAO negotiation and to avoid market distortions for European airlines however, the best solution would be to fully repeal EU-ETS.</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>The adoption of Regulation 421/2014 has contributed to creating a positive setting for negotiations in ICAO. An extension of the application of Reg. 421/2014 for the period 2017-2020 would have a similarly beneficial effect and avoid any political distractions from the remaining tasks (e.g. finalization of MRV requirements in ICAO, adoption of national legislation to implement the GMBM). This is particularly important as, in the period 2017-2020, experts from the European Commission and EU Member States will have a key role to play in contributing to ICAO's remaining work on the operationalization of the GMBM. It should be noted that many States and industry stakeholders have agreed to support the GMBM but only on the premise that it would prevent the introduction of unilateral measures for international aviation.</p> <p>To support the results of ICAO negotiation and to avoid market distortions for European airlines however, the best solution would be to fully repeal EU-ETS for this period.</p>
<p>Which options should be considered beyond 2020?</p>
<p>In BDL's view, the implementation of a single GMBM should obviate the need for existing and new economic measures to be applied to international aviation emissions on a regional or national basis. Therefore, all international flights to/from airports in the EEA should be subject exclusively to the GMBM and removed from the scope of the EU ETS. In BDL's view, while domestic flights are beyond the scope of the GMBM, any regulative measures applicable to domestic flights should be aligned and made compatible with the GMBM to avoid regulatory fragmentation and to minimize the administrative burden on operators and potential market distortions. In 2013, Germany's domestic flights accounted for 0.25 per cent of total CO2 emissions in Germany and the emissions decline for years: since 1990, a reduction of 16 percent was achieved. Following this trend in the next decades, a system to limit emissions from domestic flights would not be necessary for Germany.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>In BDL's view, the implementation of a single GMBM should obviate the need for existing and new regulative measures to be applied to international aviation emissions on a regional or national basis. Insofar as EU ETS requirements would continue to apply to domestic aviation, any change to the rules applicable to the allocation or auctioning of allowances should not adversely affect the financial situation of domestic and regional carriers, something which should be duly considered and thoroughly assessed.</p> <p>Trading of offsets is already part of the EU-ETS and it should therefore be possible to apply this instrument to the new single global market mechanism on ICAO level.</p> <p>In 2013, Germany's domestic flights accounted for 0.25 per cent of total CO2 emissions in Germany and the emissions decline for years: since 1990, a reduction of 16 percent was achieved. Following this trend in the next decades, a system to limit emissions from domestic flights would not be necessary for Germany.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>Insofar as small operators are subject to EU ETS, BDL believes exemptions are appropriate to avoid placing a disproportionate administrative burden on operators that only account for a very small quantity of CO2 emissions. In general, the treatment of small operators under the GMBM and EU ETS should be aligned to the maximum extent possible.</p>
<p>Submit any other comments you may have.</p>
<p>You will find detailed information on facts and figures regarding energy efficiency and climate protection of German aviation in the BDL-report at http://www.bdl.aero/en/bdl-reports-en/energy-efficiency-report/</p>

32.

Name of the individual or organisation
Bürgerinitiative gegen Fluglärm Raunheim
Capacity in which the individual/organisation is completing Questionnaire

Civil society organisation
Please indicate your main area of focus
Fight against aircraft noise and emissions
If your organisation is registered in the Transparency Register, please give your Register ID number:
026847321188-01
Please give your country of residence/establishment
Germany
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
As well as other sectors, international aviation must contribute to real reductions in climate-relevant emissions, i.e. also in emissions with a special climate effect in high altitudes. Reduction plans for this kind of emissions must be compatible with the goal of limiting the global temperature increase below 2°C. Therefore actual measures, such as the development of new technologies, operational measures and CO2 standards for engines must be pursued with much more ambition. Operational measures must include restrictions to avoid unnecessary emission.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
The GMBM must include a strict cap from 2020 on all climate relevant emissions from international aviation, which must decrease until 2050 according to the decided goals. Emissions from operators or states temporarily or permanently exempted must be assigned to the actual participants. Allowances must be strictly limited and should be allocated free of charge only in very special cases. No price-manipulating mechanisms should be allowed. The quality of compensation measures should fulfil highest requirements for effectiveness and durability as well as ecological, social and developmental aspects. Criteria for accounting of CO2 reductions by alternative fuels must be equally strict, and all other emissions from such flights must be compensated independently. Double counting of compensations must be avoided. First generation biofuels, compensations from fossil fuel projects and from agriculture and forestry should be excluded. All aspects of the GMBM must be transparent for the public.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Rules for domestic aviation must supplement the GMBM in such a way that all aviation emissions are covered. Special programs and targets must be developed in accordance with the Paris climate goals. Where appropriate, traffic should be transferred to more climate-friendly modes of transportation. For short distance traffic, there is a huge potential for transfer to rail in most countries, for passengers as well as freight.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
EU-ETS must regain credibility and effectiveness. Excess certificates must be permanently withdrawn from the market and emissions must be effectively priced. The EU-ETS must be extended to compensate for and finally reduce all climate-relevant emissions from aviation. Since the European aviation market is (over-)developed, it must significantly contribute to real emission reductions. EU-ETS should lead the development of new compensation mechanisms as foreseen by the Paris agreement as well as of the necessary mechanisms for an effective and qualitatively demanding implementation.
Which options should be considered for the EU ETS for the period 2017-2020?
As originally planned, EU-ETS should include all flights within, to and from the European Economic Area from 2017 on. Free Allowances for aircraft operators should be reduced to an absolute minimum during this phase.
Which options should be considered beyond 2020?
As the ICAO-GMBM will cover emissions from international aviation only partially, the missing parts must be covered by EU-ETS. The cap on aviation emissions must decrease in this phase at least according to the decrease for stationary equipment. The reduction factor for the total number of certificates must be assessed according to the requirements to fulfil the Paris climate goals and must probably be higher than the 2.2% foreseen by now.
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
As already mentioned, EU-ETS should adapt the number of certificates to meet the Paris climate goals, reduce free allowances to an absolute minimum, and guarantee a high quality of compensation measures.

Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Exemptions of emitters should generally be avoided. If exemptions are granted, the respective emissions should be covered by others included in the scheme. If necessary, small emitters can be entitled to use simplified measures for emission calculation, monitoring and reporting.
Submit any other comments you may have.
Emission trading systems can no longer be seen as the most efficient instruments to reduce GHG emissions with the velocity and to the amounts dictated by a changing climate. International policy should be developed such that a certain price for emission units is established, which drives the transition to low emission technologies in such a way as is necessary to contain the negative impacts of climate change. Income from the respective taxes or fees should be used for mitigation of the social, ecological and economic consequences of climate change and for research and development of new measures and instruments to slow climate change and cope with its consequences.

33.

Name of the individual or organisation
IETA (International Emissions Trading Association)
Capacity in which the individual/organisation is completing Questionnaire
International organisation
If your organisation is registered in the Transparency Register, please give your Register ID number:
7157999502-14
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
International aviation lends itself to an international carbon mitigation mechanism across all countries to address climate change. IETA views the Global Market-Based-Mechanism (GMBM) as an important contribution and encourages the adoption of ICAO's resolution this year, so it can enter into force by 2020. Key recommendations: <ul style="list-style-type: none"> • Avoid "reinventing the wheel" in designing the GMBM and use lessons from earlier carbon markets • Avoid delaying the full implementation of the GMBM • Offsetting obligations for the aviation sector can be met with existing and future international credits. The GMBM should remain 'open' to future types of international credits. • Potential inconsistency in reference to emission units that meet the Emission Unit Criteria on the one hand, and emission units generated from programmes, on the other. • The resolution should clearly specify that the global MBM will not allow double-counting of reductions
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<ul style="list-style-type: none"> • Robust emissions monitoring reporting and verification criteria and accounting rules to underline safeguard environmental integrity. • A centralised registry is necessary in view of tracking trades and avoiding double-counting. The registry would create shadow units to reduce transaction costs & enable greater liquidity and price discovery by allowing entities access to one single registry account. • Clarity on the asset classes that may be recognised in the GMBM, and efforts to encourage early action, which provides an important signal to investors and project developers. It also enables the airline industry to engage with the carbon market. • Clarity on the process for raising ambition over time, including a clear timetable for full inclusion of all parties if a segregated approach is initially adopted. • Governance considerations and identifying the various bodies' responsibilities and market oversight are important. • A clear timeline should be adopted for the next steps
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Action taken by countries or groups of countries to address emissions from domestic aviation should be complementary to the GMBM for international aviation. It is possible to foresee a mix of measures to reduce GHG emissions from aviation. However, efforts to reduce the administrative burden to those who operate in different jurisdictions need to be addressed. Ideally global and domestic measures should be part of a single global scheme. However, as a minimum, any domestic action should not undermine global efforts and should at least be as ambitious as international efforts.

Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?

The following basic principles should be taken into account:

1. Long-term, science- and environmentally-based goals should be set.
 - This assumes a clear and stable regulatory regime that drives a stable market.
 - Supply and demand should create a dynamic market that drives the price.
 - Clear rules will provide confidence to participants and investors.
2. An open and broad market will perform the best.
 - The design should promote broad participation to enhance liquidity.
 - An open market will allow entities to hedge their exposure and minimise costs.
 - Use of existing offset standards and asset classes will help assure adequate supply.
3. Sound market infrastructure should underpin the system.
 - Solid measurement, reporting and verification techniques build confidence amongst market participants, regulators and other stakeholders.
 - Market information should be made available in a fair and transparent manner.
 - The registry must operate efficiently and securely.

Which options should be considered for the EU ETS for the period 2017-2020?

It is important for all sectors to contribute towards the environmental target, and the aviation sector should also play its part.

IETA has identified 3 possible options that could occur in the EU between 2017 and 2020:

- Option 1: Extend the current rules of the EU ETS under 'stop the clock' for the aviation sector until 2020
- Option 2: Exempt the aviation sector from the EU ETS until 2020
- Option 3: Include all flights to/from the EU in the scope of the EU ETS until 2020

IETA recommends option 1 for the EU for the period 2017-20. Options such as excluding the aviation sector altogether from the EU ETS would put into question the contribution of the sector towards achieving the long-term target, and would represent a step back in terms of coverage of the EU ETS and environmental efforts. The option of including all flights (domestic and international) in the scope of the EU ETS for the period 2017-2020 risks undermining international negotiations and is counter-productive.

Which options should be considered beyond 2020?

IETA has identified 3 possible post 2020 options. However, the priority must be to enact a global MBM for aviation.

Option 1: Extend the current rules of the EU ETS for the aviation sector beyond 2020

Pros: Ensures emissions from all flights are covered, either via the EU ETS or via the GMBM for international flights.

Cons: Are intra-EU flights international? If not, extension of the current rules is against the spirit of the GMBM.

Option 2: Exempt the aviation sector from the EU ETS after 2020

Pros: 1 compliance mechanism for all flights simplifies the rules

Cons: Environmental concerns: Carbon Neutral Growth target is less ambitious than emission reductions in EU ETS. Other regions are considering including domestic aviation in a national ETS

Option 3: Include all flights to/from the EU in the EU ETS

Pros: Extending EU ETS scope gives a greater opportunity for emission reductions.

Cons: High risk of political objection. Contradicts international efforts to reach a global deal

According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?

Consider the timing of auctions: EUAA auctions are much more compliance-driven and this could be reflected in the timing of volumes. Previous EUAA auctions show that interest in the auctions is highest at the beginning of the year before 31 March compliance deadline, as well as in December for the settlement of futures. Instead of an even distribution of auction volumes across the year, offering higher volumes in the first quarter of the year and in December, may be more suitable. This could increase participation, which is important given the relatively small size of the EUAA market. However, greater analysis is needed, as some operators may value auctioning to be evenly spread throughout the calendar.

Criteria for participation should be reviewed: IETA believes the list of eligible participants in auctions is adequate; however we would like to point out some further considerations. The paramount argument is to ensure market integrity.

Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO₂ per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?

IETA believes that it makes practical and operational sense to exclude small aircraft operators from EU legislation from 2021 onwards. However a discussion is needed on how excluded/exempted flights would be covered through other means or other parties, in view of reaching the carbon neutral growth target.

Submit any other comments you may have.

For further detailed responses, please go to:

<https://ieta.wildapricot.org/resources/Resources/Submissions/IETA%20EU%20stakeholder%20consultation%20Aviation%20-%20Detailed%20responses.pdf>

Name of the individual or organisation
UECNA - European Union Against Aircrafts Nuisances
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus
protection of the populations overflown by aircrafts at low altitude from nuisances
If your organisation is registered in the Transparency Register, please give your Register ID number:
932640120950-51
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
The right effort should have been to include aviation into the Paris Agreement discussions. Aviation will be one of the biggest contributors of emissions leading to a climate change. The industry must focus on low emission engines with a view to have a lesser impact on the climate but also to emit less toxic gases for the populations. Operational restrictions should be applied.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
From 2020 on, a rigid limit for all climate-relevant emissions must be implemented in the GMBM. These limits must decrease until 2050 as already stated. Distributed emission shares must expire respectively. The distribution of emission shares free of charge especially for the climate-damaging aviation as well as cost limiting or cost restricting mechanisms should be prohibited. National subsidies and compensations for certificates should be inhibited. The quality of measures for emission compensation must be based on effectiveness and durability. Strict standards are to be applied to the consideration of environmental, social and development policy aspects. Double counting compensations, e.g. for national goals, must be avoided. The GMBM must be transparent for the people. Excluding aviation from the GMBM is unacceptable.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
The regulations for domestic air traffic of countries and groups of countries must complete the GMBM in order to cover all emissions caused by aviation. In addition, programs and objectives must be developed which are in accordance with the climate targets of Paris. Here, the focus should be on shifting transportation from aviation to more climate friendly means. This is limited when it comes to international transportation but has a high potential regarding short distances for passengers and cargo, e.g. by train. It is unlikely that the ICAO conference will decide on a sufficient amount of elements concerning climate change. Therefore it must be prevented that ICAO Resolutions are introduced in EU directives and regulations as mandatory.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
The priority of the EU-ETS is to regain credibility and effectiveness. For that purpose excess certificates must be taken off the market entirely and an effective price needs to be developed for emissions. The approaches to include aviation in the EU-ETS must be extended to include, compensate and in the end reduce all climate relevant emissions The European aviation business already is (over)developed and therefore must contribute to a large extend in the reduction of emissions in this area. The EU-ETS should be a pioneer in the development of new compensation mechanisms envisaged by the agreement of Paris. All necessary mechanisms for their effective and demanding implementation must be developed as soon as possible.
Which options should be considered for the EU ETS for the period 2017-2020?
From 2017 on, the EU-ETS should cover all flights within, coming to and leaving the European economic area as it was originally planned. Allowances free of charge for air traffic operators must be minimized.
Which options should be considered beyond 2020?
Presumably, emissions from international aviation covered by the GMBM will be incomplete and fragmentary, thus the listing of all international flights must remain included. Flights covered partially by the GMBM should include the non-listed emission shares. The maximum threshold of emissions caused by aviation must decrease as much as for stationary sites in this stage. The Reduction of the overall number of certificates must be rechecked based on the climate targets of

Paris and thus probably needs to be higher than the envisaged 2.2%
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Non-coverage of emitters should be avoided in general. If necessary simplified measures of emission calculation and supervisory reporting could be applied for small emitters.

35.

Name of the individual or organisation
Austrian Airlines
Capacity in which the individual/organisation is completing Questionnaire
Private enterprise
Business sector
Airline
If Private Enterprise
Yes - medium-sized enterprise
If your organisation is registered in the Transparency Register, please give your Register ID number:
983474516327-48
Please give your country of residence/establishment
Austria
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
Air transport is an enabler of economic activity; the liberalisation of air transport in the EU is estimated to have boosted EU GDP by as much as 4.0 %, notably in promoting business travel and tourism. The industry must continue to provide these benefits whilst at the same time addressing its CO2 emissions in line with what is economically reasonable and technologically feasible. Austrian Airlines and the aviation industry as a whole therefore make a strong call on Governments to reach an agreement on a global market-based measure (GMBM) to address global aviation emissions at global level and to replace the European standalone system, EU ETS for aviation, with the GMBM.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
For the GMBM to take effect from 2020, the 2016 ICAO Assembly must reach an agreement on the key design elements of the GMBM, including initial guidance for monitoring, reporting and verification (MRV) requirements that keep the GMBM as simple as possible in terms of administration as well as for the eligibility of emissions units. Very likely there will be some outstanding work to be undertaken after the 2016 Assembly to allow the GMBM to become fully operational from 2020 and assist States with its implementation. Key design elements of the GMBM to be agreed include potential provisions for differentiation at route-level (phase-in), allocation of offset obligations at operator level and technical exemptions.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Implementation of the GMBM should make existing and new economic measures to be applied to international aviation emissions on a regional or national basis unnecessary. Following this logic our expectation is that the ICAO GMBM will replace the aviation ETS in Europe. To address emissions from domestic aviation, national policies should first concentrate on the deployment of sustainable alternative fuels, the implementation of optimized procedures and the provision of infrastructure. Austrian Airlines recognise that domestic aviation is beyond the scope of the GMBM in ICAO; should a State consider to apply any kind of market-based measure to domestic flights, the measure should be aligned and compatible with the GMBM to the greatest extent possible and/or eventually include the domestic flights in the GMBM with the aim to avoid regulatory fragmentation as well as potential market distortions and to minimize the administrative burden for operators.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
The priority must be the implementation of the GMBM and the completion of the work in ICAO. During the EU ETS review, the legislator should ensure the competitiveness of European carriers and avoid adverse financial and political implications. Our expectation is that the ICAO GMBM will replace the aviation ETS in Europe. It should therefore be amended to provide for an appropriate transition mechanism to ensure that operators will not be regulated twice with separate, overlapping measures and a duplication of administrative obligations.
Which options should be considered for the EU ETS for the period 2017-2020?

The adoption of Regulation 421/2014 has contributed to creating a positive setting for negotiations in ICAO during the past two years. It should be noted that Austrian Airlines support the GMBM and expect that it would prevent the continuation of unilateral measures for international aviation and replace existing schemes such as the aviation ETS in Europe.
Which options should be considered beyond 2020?
The single GMBM should make existing and new economic measures to be applied to international aviation emissions on a regional or national basis unnecessary. Following this logic, our expectation is that the ICAO GMBM will replace the aviation ETS in Europe and all international flights to/from airports in the EEA should be subject exclusively to the GMBM. Austrian Airlines recognise that domestic aviation is beyond the scope of the GMBM in ICAO; should a State consider to apply any kind of market-based measure to domestic flights, the measure should be aligned and compatible with the GMBM to the greatest extent possible and/or eventually include the domestic flights in the GMBM with the aim to avoid regulatory fragmentation as well as and potential market distortions and minimize the administrative burden for operators.
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
The single GMBM should make existing and new economic measures for international aviation emissions at regional basis unnecessary. Should the legislator decide that EU ETS requirements would apply following the 2016 Assembly, we do not see any need to consider the rules related to the allocation or auctioning of allowances as this would adversely affect European carriers.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Insofar as small operators are subject to EU ETS, the prolongation of existing exemptions are appropriate to avoid placing a disproportionate administrative burden on operators that only account for a very small quantity of CO2 emissions. In general, the treatment of small operators under the GMBM and EU ETS should be aligned to the maximum extent possible.

36.

Name of the individual or organisation
Sandbag
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus
Sandbag is Europe's leading NGO on market based measures in climate policy, focused since 2008 on understanding and reforming the Emissions Trading Scheme
If your organisation is registered in the Transparency Register, please give your Register ID number:
94944179052-82
Please give your country of residence/establishment
United Kingdom
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
Whilst across Europe in many sectors energy use and emissions are falling, aviation emissions continue to grow. Internationally, aviation is responsible for up to ~5% of global greenhouse gas emissions, and growing. Thus far, international aviation has avoided payment or penalty for the large climate impact of its emissions. Therefore: <ul style="list-style-type: none"> • Emission reductions should first be incentivised in the sector itself, rather than purely through offsets; • The proposed 2020 carbon neutrality goal under ICAO must be increased in order that aviation plays its fair part in keeping the world to a 1.5c temperature rise; • ICAO policies must not in any way limit more ambitious policies by states and regions; • Radiative forcing must be included - the CO2 emissions from aviation must be subject to a multiplier; • Since no global cap on aviation emissions is currently in place, the ETS must start operating again in its full scope in 2017.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust

<p>GMBM by 2020?</p> <p>A legally binding agreement that comes into force in 2021 that includes:</p> <ul style="list-style-type: none"> o MRV beginning as soon as practicable o All air travel from one country to another. To ensure equity, routes between developed countries should be subject to more ambitious climate policies. o A substantial increase of the proposed 2020 carbon neutrality goal in line with the long-term goals agreed in Paris. o A provision encouraging states to take additional measures and greater ambition. o Ambitious in-sector reduction targets. o A multiplier of at least two on CO₂ emissions from aviation to incorporate aviation emission's radiative forcing. o Proper accounting of all warming effects including for alternative fuels.
<p>In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?</p> <p>An ICAO agreement should be seen as a floor for ambition, not a ceiling. Nothing in the Assembly Resolution should prohibit states to implement more ambitious measures. States must be able and encouraged to establish their own more ambitious emissions caps for the aviation sector.</p> <p>Since an ICAO agreement will only cover international travel (departing in one state, arriving in another), countries must establish caps for domestic aviation emissions in line with the long-term goals agreed in Paris.</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p> <p>Combined ICAO and EU action must ensure emissions reductions in line with the long-term goals agreed in Paris. The EU must set its own aviation sector targets in line with Paris if ICAO establishes a GMBM:</p> <ul style="list-style-type: none"> · that is not legally binding; · without a higher target than 2020 carbon neutrality; · with weak accounting rules; · that is based only on offsetting and not on in-sector reductions. <p>The ETS must start operating again in its full scope in 2017. From 2021 the ETS must cover all inner-EU flights and 50% of all international flights:</p> <ul style="list-style-type: none"> · Aviation must be subject to the same 2030 target as all other ETS sectors. The EU must fill in the gap between the ICAO target and the overall EU 2030 target; · No free ETS allowances to the aviation sector from 2017 onwards. · The ETS target must be brought in line with the Paris Agreement. Therefore 2030 ETS target must be raised significantly.
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p> <p>The Stop the Clock provision was implemented in order to grant ICAO more time to negotiate a GMBM. Since no GMBM is currently in place, the ETS must start operating again in its full scope in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by the Paris outcome. This will be a helpful exercise, particularly in MRV, for the global MBM to begin in 2021. There is no further space for delaying any climate action.</p>
<p>Which options should be considered beyond 2020?</p> <p>From 2021 onwards, the ETS must cover all inner-EU flights and 50% of all outgoing and 50% of all incoming international flights:</p> <ul style="list-style-type: none"> · Aviation must be subject to the same 2030 target as the other ETS sectors; · No free ETS allowances must be given to the aviation sector from 2017 onwards; · The ETS target must be brought in line with the Paris Agreement. Therefore the currently proposed 2030 ETS target of minus 43% below 2005 levels must be raised significantly.
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>The Stop the Clock provision was implemented in order to grant ICAO more time to negotiate a GMBM. Since no GMBM is currently in place, the ETS must start operating again in its full scope in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by the Paris outcome.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO₂ per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>Fuel taxation and/or VAT is a more effective measure for small operators since there are fewer or no legal barriers to such policies for small non-commercial aircraft.</p>

Name of the individual or organisation
easyJet
Capacity in which the individual/organisation is completing Questionnaire
Private enterprise
Business sector
Airline
If your organisation is registered in the Transparency Register, please give your Register ID number:
291219715847-52
Please give your country of residence/establishment
United Kingdom
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
<p>easyJet supports the Paris agreement and the long term goal for global temperature increases. We believe that the aviation sector should play its role in tackling climate change. For this reason we supported the development of EU ETS and its application to aviation.</p> <p>The development of new technology more efficient aircraft, alongside other carbon saving measures such as biofuels, is the key to reducing the growth in aviation emissions. It is important that any emissions scheme that applies to aviation provides the right incentives for airlines to invest in new technology.</p>
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<p>ICAO should deliver a credible and simple scheme which provides the right incentives for airlines to become more efficient. The main elements of this are:</p> <p>(1) low compliance costs; so as wide a scope as possible in terms of its reporting and offset requirements, rather than a route by route scope</p> <p>(2) direct incentives for airlines to become more efficient; so a scheme where the offset requirement is linked to each airlines own emissions</p> <p>(3) a predictable offset requirement on each airline; so a scheme where each airline is required to offset its own growth in emissions. If the obligation is linked to other airline emissions the offset requirement, and therefore cost, only becomes known once the reporting process is complete.</p> <p>We recognise that there are aspects of the potential GMBM design that may be not be consistent with the principles we set out above. This does not mean that the GMBM should not be taken forward, but is simply a recognition that the design may be suboptimal.</p>
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
<p>easyJet supports the Global Market Based Measures and the implementation of a single scheme worldwide. To support this aim we believe that the EU should include domestic flights in the scheme as it applies to Europe together with all international flights. In this way all emissions would be included in the scope of the scheme and airline emissions would be treated on a consistent basis.</p> <p>As regards to actions that could be taken by group of countries we believe that all European countries should treat all their emissions on a single consistent basis, with a single scheme for all European aviation. The effect of this is that the scope of the scheme applied within Europe should include domestic emissions..</p>
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
<p>easyJet thinks that the main principles and criteria should be the following:</p> <ul style="list-style-type: none"> • Aviation should be part of a single scheme covering international and domestic flights. • Efficiency – to ensure that emissions reductions are achieved as efficiently as possible by incentivising the most efficient emission savings. • Simplicity – the scheme should be simple, clear and easy to implement. • Deliver effective incentives for airlines –the scheme should be designed to deliver incentives for airlines to increase the efficiency of their flying.
Which options should be considered for the EU ETS for the period 2017-2020?
<p>For the period 2017-2020 we think it would be helpful to ensure that EU ETS covers the greatest possible scope of emissions. This requires the inclusion of some or all of the flights with destinations outside the EU that are currently subject to a derogation. We suggest that a reasonable compromise might be to ensure that EU ETS applied to all flight departing EU airports.</p>
Which options should be considered beyond 2020?

<p>For the period beyond 2020 we support the application of the Global Market Based Measures in Europe, on the condition that:</p> <ul style="list-style-type: none"> • It applies to domestic flights – one single scheme should cover all flights, international and domestic • For simplicity the scope of the scheme applies to all European emissions as a single grouping, with no route or country based scope.
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>We see no reason to adjust the design of the aviation scheme within EU ETS. This includes the allocation of free permits etc. The logic of the provision of free permits remains the same as when the system was put in place. Auctioning permits simply acts as a tax on aviation and passengers. There are no windfall gains from the allocation of free permits, as the level of competition within the airline sector ensures that airlines are unable to sustain any increase in fares that is not justified on the basis of cost.</p> <p>However, if the scope of EU ETS remains altered from the original design then the application of the design metrics (the RTK and emission basis for the allocation of free permits) should be recalibrated to reflect this new scope.</p>

38.

Name of the individual or organisation
Airlines for Europe
Capacity in which the individual/organisation is completing Questionnaire
Professional Organisation
Please indicate the sectors your organisation represents
Aviation/European Airlines
Where is your company located?
Belgium
If your organisation is registered in the Transparency Register, please give your Register ID number:
807912421050-91
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
<p>Air transport is an enabler of economic activity; the liberalisation of air transport in the EU is estimated to have boosted EU GDP by as much as 4.0 %, notably in promoting business travel and tourism. Flying more than 500 Million passengers per year, the members of Airlines for Europe (A4E) account for half of the continent's passenger journeys. Every day, more than 2,300 of their aircraft cross the continent, and more than 300,000 employees in the air and on the ground ensure safe and reliable operations. The industry must continue to provide these benefits whilst at the same time addressing its CO2 emissions in line with what is economically reasonable and technologically feasible. A4E airlines and the aviation industry as a whole therefore make a strong call on Governments to reach an agreement on a global market-based measure (GMBM) to address global aviation emissions at global level and to replace the European standalone system, EU ETS for aviation, with the GMBM.</p>
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<p>For the GMBM to take effect from 2020, the 2016 ICAO Assembly must reach an agreement on the key design elements of the GMBM, including initial guidance for monitoring, reporting and verification (MRV) requirements that keep the GMBM as simple as possible in terms of administration as well as for the eligibility of emissions units. Very likely there will be some outstanding work to be undertaken after the 2016 Assembly to allow the GMBM to become fully operational from 2020 and assist States with its implementation. Key design elements of the GMBM to be agreed include potential provisions for differentiation at route-level (phase-in), allocation of offset obligations at operator level and technical exemptions.</p>
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?

<p>Implementation of the GMBM should make existing and new economic measures to be applied to international aviation emissions on a regional or national basis unnecessary. Following this logic, A4E's expectation is that the ICAO GMBM will replace the aviation ETS in Europe. To address emissions from domestic aviation, national policies should first concentrate on the deployment of sustainable alternative fuels, the implementation of optimized procedures and the provision of infrastructure.</p> <p>A4E recognises that domestic aviation is beyond the scope of the GMBM in ICAO; should a State consider to apply any kind of market-based measure to domestic flights, the measure should be aligned and compatible with the GMBM to the greatest extent possible and/or eventually include the domestic flights in the GMBM with the aim to avoid regulatory fragmentation as well as potential market distortions and to minimize the administrative burden for operators.</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>The priority must be the implementation of the GMBM and the completion of the work in ICAO. During the EU ETS review, the legislator should ensure the competitiveness of European carriers and avoid adverse financial and political implications. A4E's expectation is that the ICAO GMBM will replace the aviation ETS in Europe. It should therefore be amended to provide for an appropriate transition mechanism to ensure that operators will not be regulated twice with separate, overlapping measures and a duplication of administrative obligations.</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>The adoption of Regulation 421/2014 has contributed to creating a positive setting for negotiations in ICAO during the past two years. It should be noted that A4E supports the GMBM and expects that it would prevent the continuation of unilateral measures for international aviation and replace existing schemes such as the aviation ETS in Europe.</p>
<p>Which options should be considered beyond 2020?</p>
<p>The single GMBM should make existing and new economic measures to be applied to international aviation emissions on a regional or national basis unnecessary. Following this logic, A4E's expectation is that the ICAO GMBM will replace the aviation ETS in Europe and all international flights to/from airports in the EEA should be subject exclusively to the GMBM. A4E recognises that domestic aviation is beyond the scope of the GMBM in ICAO; should a State consider to apply any kind of market-based measure to domestic flights, the measure should be aligned and compatible with the GMBM to the greatest extent possible and/or eventually include the domestic flights in the GMBM with the aim to avoid regulatory fragmentation as well as and potential market distortions and minimize the administrative burden for operators.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>The single GMBM should make existing and new economic measures for international aviation emissions at regional basis unnecessary. Should the legislator decide that EU ETS requirements would apply following the 2016 Assembly, A4E does not see any need to consider the rules related to the allocation or auctioning of allowances as this would adversely affect European carriers.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>Insofar as small operators are subject to EU ETS, the prolongation of existing exemptions are appropriate to avoid placing a disproportionate administrative burden on operators that only account for a very small quantity of CO2 emissions. In general, the treatment of small operators under the GMBM and EU ETS should be aligned to the maximum extent possible.</p>

39.

Name of the individual or organisation
Total
Capacity in which the individual/organisation is completing Questionnaire
Private Enterprise
Please indicate the sectors your organisation represents
Energy
Where is your company located?
France
If your organisation is registered in the Transparency Register, please give your Register ID number:

1849405799-88
Please give your country of residence/establishment
France
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
<p>We are of the opinion that in order to reduce GHG emissions from transport activities, all actors of aviation industry should contribute.</p> <p>Further considerations for the long term:</p> <ul style="list-style-type: none"> • The ambitious goals of the aviation industry to reduce emissions by 2050 are unattainable without an unprecedented expansion of biofuels production for use in the aviation sector. Aviation biofuel can potentially save over 1 billion metric tons of CO₂ annually by 2050 – more than all of the other potential sources of carbon abatement combined. • The aviation sector should expand the research, development and demonstration (RD&D) of sustainable biofuels, and governments and airlines should work together to advance renewable jet fuel technology to reach a commercial scale, while ensuring the delivery of real emission reductions compared with alternatives and the use of stringent sustainability criteria.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
We expect that the 2016 ICAO Assembly will endorse the basket of measures approach including energy efficiency, biojet, traffic optimization and global MBM as a complementary tool to close the emission gap of the Carbon Neutral Growth 2020 (CNG2020) objective. This gap could arise when GHG reductions from technology, operational or infrastructure would not be sufficient to reach the CNG 2020 target taking into account the continuous growth of air traffic (5% per year worldwide).
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
<p>The ideal solution is to have an international regulation for aviation. Nevertheless all sovereign entities should be allowed to implement specific measures provided that they do not lead to market distortion for aviation industry and are consistent and complementary to existent and future ICAO regulations.</p> <p>Together with the envisaged global MBMs for aviation emissions, the increase in the use of biofuels for aviation can contribute significantly to the reduction of GHG emissions in this sector.</p> <p>Further considerations: Unlike road traffic, the EU does not have mandated levels on the use of biofuels for air transport to encourage their uptake. As a result, its usage has been limited to isolated trials. Since biojet remains much more expensive than traditional kerosene, for its further deployment, EU-level incentives are needed. Even low blends, for example 5-10 % biofuel blend in kerosene, might lead to significant cost imbalances. If this fuel is purchased only by some airlines on a voluntary basis, these will not be able to pass on their costs to the passenger</p> <p>Government should support for 1) further investment and research and development in emerging feedstocks such as waste based biofuels (to increase their production); 2) building new infrastructure for biofuel production; and 3) supporting policies, such as extending biodiesel production grants to biojet fuel to make them more commercially viable, can have a crucial impact in the uptake of biofuels for aviation.</p>
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
The review of the ETS after the 2016 ICAO Assembly should lead to pragmatic solutions taking into account existing levers to start decarbonizing the aviation sector such as biojet, new engine technologies, traffic management.
Which options should be considered for the EU ETS for the period 2017-2020?
We are of the opinion that the current EU ETS for domestic aviation should be extended till at least 2020.
Which options should be considered beyond 2020?
<p>We are of the opinion that GHG reductions in aviation as results from technology, operational and infrastructure improvements and biojet should be maintained eligible for credits. Those could be used as compliance mechanism for the domestic aviation sector.</p> <p>For aviation, liquid biofuels are the only low-CO₂ option for substituting kerosene, as they have high specific energy content. Beyond 2020, if the right support measures are put in place at EU level, we believe aviation biofuels will have an increasing role in climate change mitigation. For the time being as carbon price is low there is a need for biojet mandates in order to prepare the future and have available biojet molecules when they would be needed.</p>
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment

of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
EU-ETS should be consistent with ICAO basket of measures to abide with “non carbon growth”.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
We support the exemption of non-commercial aircraft operators emitting less than 1000 tons of CO2 per year.
Submit any other comments you may have.
We would like to call for a stronger support of research and development for biojet in order to reach cost effective biojet solutions and contribute at the maximum to a reduction in GHG emissions from aviation. Alternative low carbon fuels for the aviation sector should be included in the range of technologies eligible to access the Innovation Fund.

40.

Name of the individual or organisation
European Low Fares Airline Association (ELFAA)
Capacity in which the individual/organisation is completing Questionnaire
International Organisation
Please indicate the sectors your organisation represents
Energy
Where is your company located?
United Kingdom
If your organisation is registered in the Transparency Register, please give your Register ID number:
64625695988-92
Please give your country of residence/establishment
France
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
ELFAA points to the basket of measures, planned to reduce the carbon footprint of international aviation. These notwithstanding, ELFAA accepts the need for an MBM to complement other measures in the short-medium term.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
The GMBM to be adopted at the ICAO GA of 2016 should be based on: <ul style="list-style-type: none"> - global carbon offset scheme - route-based system - 100% sectoral approach - baseline actual 2020 emissions - widest possible scope, therefore ideally - no exemptions - if exemptions agreed by states for economic/political reasons, no redistribution of obligations, so exempted - no patchwork of schemes of varying environmental effectiveness, stringency/cost-effectiveness, requiring - exclusive scheme, supplanting national/regional measures - non-discriminatory - no competitive distortions, therefore all states/carriers on a route to be treated identically
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
<ul style="list-style-type: none"> - The ICAO GMBM will address all emissions from international aviation. ICAO correctly defines flights between two EU states as international therefore there should be no continuation of EU ETS for international flights between EU states, from entry into force of the GMBM. - EU ETS, if applied to flights within an EU state, would have only very marginal environmental effectiveness. As such a measure is unlikely to be replicated by many states, with whose carriers European

operators compete on the global network, it would constitute a self-inflicted penalty on the competitiveness of European aviation, running counter to one of the stated objectives of the EU aviation strategy, for no meaningful environmental gain.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
The EU Derogation exempting international flights to and from third countries from complying with EU ETS was predicated on the landmark progress at ICAO to develop a global MBM, which the Commission, Parliament and Council, in adopting the Derogation and revised Regulation, acknowledged to be the preferred global response to a global problem. Consistent with this, inclusion of aviation in EU ETS should be discontinued, once ICAO has met the stated objective of agreeing at the 2016 General Assembly the design of a GMBM for application from 2020.
Which options should be considered for the EU ETS for the period 2017-2020?
See response to Q4 above.
Which options should be considered beyond 2020?
Reversion to full scope EU ETS is generally acknowledged to be politically unthinkable. The conditionality of Regulation 421/2914 described above should realistically be seen. Therefore, as intended to maintain pressure on the ICAO process – a tactic which has succeeded admirably, and for which the EU can take considerable credit. EU ETS can rightly be seen to have acted as an effective catalyst, spurring ICAO into action at the more environmentally-effective global level. Having served its purpose, it should reasonably lapse.
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
See response to Q6 above.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
As stated in our response to Q2, ELFAA would prefer there be no exemptions. If any are granted notwithstanding, they should not result in any reallocation of obligations to those within the scope of the GMBM.

41.

Name of the individual or organisation
Bürgerinitiative Südbadischer Flughafen Anrainer BISF
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus
Protection from the burden of flight traffic emissions
If your organisation is registered in the Transparency Register, please give your Registry ID number
637687021774-86
Please give your country of residence/establishment
Germany
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
As transport with the emissions causing the most damage to the climate, international aviation must contribute to the reduction of greenhouse gas emissions. Aircraft emit not only CO ₂ , but also nitrogen oxides, ozone, sulphates, soot and water vapour, which have specific climate change impacts at high altitudes. For these emissions, reduction schemes must follow the objective of limiting the temperature increase to well below two degrees centigrade. To this end, the existing measures (development of alternative propulsion systems, operational measures, and demanding, dynamic limit values for climate-damaging engine exhaust emissions) must be pursued very much more intensively and ambitiously. In operational measures, restrictions (operational limitations) to avoid unnecessary emissions should also not be taboo.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
The GMBM must contain a strict cap from 2020 for all greenhouse gas emissions from international aviation

<p>which is decreased in accordance with the already agreed objectives up to 2050. Emission allowances allocated are to lapse pro rata in accordance with the requirements of the reduction targets. Allocation of free emission allowances for particularly climate-damaging air transport, as well as price-curbing or limiting mechanisms must not be allowed. National subsidies or offsets for allowances must be prohibited. The highest demands must be made in terms of effectiveness and sustainability, as well as environmental, social and development policy aspects, regarding the quality of the emission offsetting measures. Double counting of offsets, for example for national targets too, must be strictly avoided. The GMBM must in all respects be transparent to the public. The exclusion of the aviation sector from participation in the GMBM is not acceptable.</p>
<p>In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?</p>
<p>The rules of countries and groups of countries for the respective domestic aviation must complement the GMBM in such a way that all emissions from aviation are fully covered. In addition, they must also develop programmes and objectives that are consistent with the Paris climate objectives.</p> <p>In particular, use should be made of the instrument of the shift from air transport to more environment-friendly modes of transport, which in international traffic is available only to a limited extent. For short-haul traffic, there is huge potential in most countries for shifts to rail transport, for both passengers and freight. It is not expected that at the ICAO Conference sufficient elements for climate protection will be decided. It is necessary to prevent the resolutions of the ICAO Conference being introduced as mandatory by the 'back door' through EU regulations or directives.</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>It is crucial for the EU ETS to regain its credibility and effectiveness. To this end, surplus allowances must be removed completely and permanently from circulation and an effective price for emissions must be developed. Existing approaches to the inclusion of aviation in the EU ETS must be widened so that all climate-relevant emissions can be included, offset and finally reduced.</p> <p>As the European aviation market is already (over-)developed, it must make a significant contribution to the real cuts in emissions in this sector.</p> <p>The EU ETS should be at the forefront of the development of the new offsetting mechanisms provided for by the Paris Agreement and as soon as possible develop all necessary instruments for their effective and high quality implementation.</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>The EU ETS should, as initially planned, as from 2017 again cover all flights within, into or out of the European Economic Area. Free allocations for air transport operators need to be reduced in this phase to the absolute minimum.</p>
<p>Which options should be considered beyond 2020?</p>
<p>Since in all likelihood the cover of the emissions from international aviation by the GMBM will be very incomplete and fragmentary, the inclusion of international flights must be retained. For flights partially covered by the GMBM, the parts of the emissions not covered should be included.</p> <p>The cap for the aviation emissions allowed must decrease at least as much in this phase as that for stationary installations; the reduction factor for the total quantity of allowances needs to be reviewed in the light of the requirements of the Paris climate targets and therefore very likely will be increased well above the 2.2% target planned so far.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<ol style="list-style-type: none"> 1. Binding rules on the documentation of flight movements and their emissions based on flight paths actually flown. 2. Draw up an obligation to analyse the discrepancy between emissions from the procedures actually flown from the flight procedure variant for reaching the destination which is most favourable in terms of CO₂ (in tonnes of CO₂).
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO₂ per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>In principle, exemptions of emitters should be avoided. Where necessary, simplified measures for the emission calculation and reporting can be considered for small emitters.</p>
<p>Submit any other comments you may have.</p>
<p>Air transport is essential for our positive economic and social development. A situation must be reached which unites the 3 pillars of air transport (safety, economic efficiency, load). We believe that the only way to achieve</p>

this is that the need for air transport must exist in terms of safety and economic efficiency. Only this air transport produces the load which follows the rules of common sense.

42.

Name of the individual or organisation
Bundesvereinigung gegen Fluglärm
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
If your organisation is registered in the Transparency Register, please give your Register ID number:
289297821029-02
Please indicate your main area of focus:
Förderung des Umweltschutzes, insbesondere der Schutz der Bevölkerung vor Fluglärm und anderen nachteiligen Auswirkungen des Luftverkehrs
Please give your country of residence/establishment
Germany
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
Aircraft greenhouse gas emissions include not only CO2 but also water vapour. The climate effect of CO2 emissions is therefore approximately 3 times stronger than on the ground. Aviation should therefore (absolutely!) reduce its fuel consumption, at least in accordance with the general reduction targets.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
In particular, no allocation of free allowances; all allowances should be sold by the Nation States. Every country should receive allowances in proportion to its population; this would, in particular, help developing countries. The sale should take place by means of a central auction. Grandfather rights are not part of the market economy. Competition may not be distorted to the detriment of newcomers. Allowances should be necessary for the entire route; the evidence should be provided at the respective airport of departure.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Emissions trading for national aviation and granting rights should be integrated in the international emissions trading.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
No free allocations. CO2 emissions from aviation, due to the impact on the climate of water vapour, should be assigned triple weighting. Number of additional allowances to include aviation should not exceed the present situation. The reduction target in the coming years should be at least 4% per annum.
Which options should be considered for the EU ETS for the period 2017-2020?
The system should be fully implemented by 2018.
Which options should be considered beyond 2020?
Rapid full implementation is necessary by 2018; therefore no proposals for the post-2020 period.
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
Here only measures eroding the ETS principle are discussed; such erosion is not worth discussing.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
In view of the red tape involved, not absolutely necessary; on the other hand, taxation of fuel at least corresponding to the value of the allowances.
Submit any other comments you may have.
What is needed is a complete departure from the allocation of allowances for free and a limitation of the

period of validity. Experience in the field of energy is not positive; the operation of efficient new plants is not worthwhile if additional allowances must be purchased, while existing installations continue to operate with allowances issued free of charge. This problem is far greater in aviation, due to the large number of air carriers and the growth trend, than in the energy sector; the free allowances distort competition to the detriment of newcomers, which for that matter often use more environmentally friendly planes. If the allowance prices do not reach an adequate level, the supply must be reduced.

43.

Name of the individual or organisation
Climate Action Network Europe
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
If your organisation is registered in the Transparency Register, please give your Register ID number:
5588881123-49
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
The aviation sector is responsible for 3-5% of global greenhouse gas emissions. These are expected to triple by 2050 unless action is taken. Therefore: <ul style="list-style-type: none"> · The proposed 2020 carbon neutrality goal under ICAO must be increased in line with the long-term goals agreed in Paris; · ICAO policies must not in any way limit more ambitious policies by states and regions; · Reductions should be achieved in the sector itself: Emissions from flights that start or end in the EU must not be compensated with carbon offsets from other sectors; · Aviation must raise revenue to contribute to climate finance; · The CO2 emissions from aviation must be subject to a multiplier of at least two as the total climate impact of aviation is 2-5 times higher than its CO2 emissions alone; · Since no global cap on aviation emissions is currently in place, the ETS must start operating again in its full scope in 2017.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
A legally binding agreement that comes into force in 2021 that includes: <ul style="list-style-type: none"> · All air travel from one country to another. To ensure equity, routes between developed countries should be subject to more ambitious climate policies. · A substantial increase of the proposed 2020 carbon neutrality goal in line with the long-term goals agreed in Paris. · A provision encouraging states to take additional measures and greater ambition. · Ambitious in-sector reduction targets: No compensation through carbon offsets from other sectors. · A multiplier of at least two on CO2 emissions from aviation, as the total climate impact of aviation is 2-5 times higher than its CO2 emissions alone. · Proper accounting of all warming effects including for alternative fuels.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
An ICAO agreement should be seen as a floor for ambition, not a ceiling. Nothing in the Assembly Resolution should prohibit states to implement more ambitious measures. States must be able and encouraged to establish their own more ambitious emissions caps for the aviation sector. Since an ICAO agreement will only cover international travel (departing in one state, arriving in another), countries must establish caps for domestic aviation emissions in line with the long-term goals agreed in Paris.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Combined ICAO and EU action must ensure emissions reductions in line with the long-term goals agreed in Paris. The EU must set aviation sector targets in line with Paris if ICAO establishes a GMBM: <ul style="list-style-type: none"> · that is not legally binding; · without a higher target than 2020 carbon neutrality; · weak accounting rules; · based on offsetting and not on in-sector reductions.

The ETS must start operating again in its full scope in 2017. From 2021 the ETS must cover all inner-EU flights and 50% of all international flights:

- Aviation must be subject to the same 2030 target as all other ETS sectors;
- Emissions from flights that start or end in the EU must not be offset with carbon credits from other sectors;
- No free ETS allowances to the aviation sector from 2017 onwards. Auctioning revenues must be earmarked for the Green Climate Fund;
- The ETS target must be brought in line with the Paris Agreement. Therefore the 2030 ETS target must be raised significantly.

[Which options should be considered for the EU ETS for the period 2017-2020?](#)

The Stop the Clock provision was implemented in order to grant ICAO more time to negotiate a GMBM. Since no GMBM is currently in place, the ETS must start operating again in its full scope in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by the Paris outcome.

[Which options should be considered beyond 2020?](#)

From 2021 onwards, the ETS must cover all inner-EU flights and 50% of all outgoing and 50% of all incoming international flights:

- Aviation must be subject to the same 2030 target as the other ETS sectors;
- No free ETS allowances must be given to the aviation sector from 2017 onwards and its auctioning revenues must be earmarked for the Green Climate Fund;
- Emissions from flights that start and/or end in the EU must not be compensated with international carbon offsets;
- The ETS target must be brought in line with the Paris Agreement. Therefore the currently proposed 2030 ETS target of minus 43% below 2005 levels must be raised significantly.

[According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS \(...\), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness \(e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.\)?](#)

The Stop the Clock provision was implemented in order to grant ICAO more time to negotiate a GMBM. Since no GMBM is currently in place, the ETS must start operating again in its full scope in 2017 (as stipulated by Reg 421/2014) as part of pre-2020 ambition required by the Paris outcome.

From 2021 onwards, the ETS must cover all inner-EU flights and 50% of all outgoing and 50% of all incoming international flights:

- Aviation must be subject to the same 2030 target as the other ETS sectors;
- No free ETS allowances must be given to the aviation sector from 2017 onwards and its auctioning revenues must be earmarked for the Green Climate Fund;
- Emissions from flights that start and/or end in the EU must not be compensated with international carbon offsets;
- The ETS target must be brought in line with the Paris Agreement. Therefore the currently proposed 2030 ETS target of minus 43% below 2005 levels must be raised significantly.

[Should small non-commercial aircraft operators \(emitting less than 1000 tonnes of CO2 per year\) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?](#)

Fuel taxation and/or VAT is a more effective measure for small operators since there are fewer or no legal barriers to such policies for small non-commercial aircraft.

[Submit any other comments you may have.](#)

ICAO significantly lacks transparency and therefore breaches the Aarhus convention. Transparency has to be increased substantially to ensure any agreement reached by ICAO reflects the needs and voices of civil society. The recently agreed ICAO CO2 standard fails to reduce emissions from the sector. The EU must provide complementary measures - fuel taxation, VAT, improved efficiency standards etc.

Currently the EU does not speak with a unified voice at ICAO meetings. This significantly weakens the EU's impact and undermines a push for strong climate action in the aviation sector. The EU should negotiate at ICAO in a unified single voice that advocates for strong climate action in line with the Paris Agreement.

Handing out 85% free ETS allowances, perpetuating the fuel tax exemption and VAT exemption for aviation while charging buses and trains disproportionately favors a more climate damaging mode of transportation.

National Public Authorities - Publication Preference: Under the name given

44.

Name of the individual or organisation
Bayerisches Staatsministerium für Umwelt und Verbraucherschutz (contact person: Martin.Frede@stmuvm.bayern.de)
Capacity in which the individual/organisation is completing Questionnaire
Public Authority
Please give your country of residence/establishment
Germany
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication.
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
Increasing energy efficiency, reduction of greenhouse gas emissions, long term switch to greenhouse gas free fuels.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Decision to introduce a GMBM ideally in terms of an emission trading system (ETS); time table to reducing emissions in accordance with long term goals of Paris agreement to reduce greenhouse gases to zero in the second half of the century.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Only possible in international context, national actions not appropriate; close interaction between GMBM and emission trading system.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
depending on the results of ICAO session in autumn 2016; close relationship of GMBM and emission trading system; consideration of equal opportunities of airlines inside and outside the ETS with respect to environmental effectiveness and competitiveness and without discrimination of certain airlines.
Which options should be considered for the EU ETS for the period 2017-2020?
vide supra; consideration especially of hubs and turnstiles near but outside the European ETS, avoiding of disadvantages for European airlines with transfer hubs inside the ETS (vs. others, e.g. in Turkey or Arabian peninsula); hence development of a global worldwide GMBM or ETS.
Which options should be considered beyond 2020?
Advancement of GMBM/ETS under consideration of mitigation goals of Paris Agreement
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
vide supra
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Yes, because of low emissions and high transaction costs

45.

Name of the individual or organisation
Ministry of the Environment of the Czech Republic
Capacity in which the individual/organisation is completing Questionnaire
Public authority
Please give your country of residence/establishment
Czech Republic
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of

it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
With regard to the international aviation emissions, the ICAO agreed the global aspirational goal - Carbon Neutral Growth from 2020 (CNG 2020), which should be fulfilled by basket of measures (aircraft technologies, operational improvements, sustainable alternative fuels and market-based measures). Each individual measure should be reviewed over time in order to support meeting the CNG 2020 goal. Those actions, if implemented effectively and globally, are from our point of view sufficient contributions to Paris Agreement's long term goal.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Environmental integrity, universal participation of aircraft operators (AOs), equal treatment and non-discrimination (especially is necessary to ensure that distortion of competition is avoided by treating competing flights on the same route in the same way), robust Monitoring, Reporting and Verification (MRV) system and Emissions Unit Criteria (EUC) rules, administrative simplicity and cost effectiveness, review and governance.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
If GMBM is implemented from 2021 onwards it shall be up to each EU Member States to decide in what way to address the domestic aviation emissions not covered by the GMBMs. It is clear that for some small EU Member States with very limited domestic aviation transport it is not essential, taking into account the administrative burden for AOs and Competent Authorities, to take part of an another complex EU measure, for instance the EU ETS.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Administrative simplicity, environment integrity, no overlap between global and EU measure to reduce aviation emissions and cost effectiveness.
Which options should be considered for the EU ETS for the period 2017-2020?
It depends on the outcome of the 2016 ICAO Assembly, but we foresee two general options: 1. Continuation of the EU ETS with reduced geographical scope to EEA states only; 2. Full scope of the EU ETS as it was designed originally.
Which options should be considered beyond 2020?
This question also depends on the outcome of the 2016 ICAO Assembly. If the GMBM is implemented from the 2021 onwards, the EU ETS has to address this new development. We believe that the option of continuation of the EU ETS covering the domestic flights should be considered, but EU Member States with limited domestic aviation emissions should be able to choose the alternative measure to address domestic aviation emissions.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Yes. The Czech Republic supports the exemption of the small non-commercial AOs from the EU ETS, because it should reduce significantly the administrative burden of the Member States as well as of the AOs.

46.

Name of the individual or organisation
The Danish Government
Capacity in which the individual/organisation is completing Questionnaire
Public authority
Please give your country of residence/establishment
Denmark
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
International Air Transport Association (IATA) has adopted targets to mitigate CO2 emissions from air transport on carbon neutral growth by 2020 and reducing emissions by 50 % by 2050 compared to 2005 emissions. These targets are welcomed by Denmark and are considered as an important step in assuring that international aviation contributes to the objective of "holding the increase in the global average temperature to well below 2 °C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5 °C above pre-industrial levels" as set out in the Paris Agreement adopted by Conference of the Parties of the United Nations Framework Convention on Climate Change at COP21 in December 2015. Over time all sectors should be regulated to be in line with the 2/1.5 degree objective in the Paris Agreement.

Due to space limitations, please refer to the last section (“any other comments”) for the second half of the Danish response to this question.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
The ICAO Assembly should deliver an agreed resolution with specific timelines for implementation of a GMBM. The agreed GMBM scheme should be environmentally effective allowing for the use of high quality emission units and not introduce competitive distortion. It should also not constitute an excessive administrative burden upon operators.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
The possibility of extending the GMBM to domestic flights on a voluntary basis for each country could reduce the reporting obligations compared to having different schemes for international and domestic aviation.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
A clear timeline for the implementation of a GMBM should be set as well as targets consistent with the 2/1½ degree objective in the Paris Agreement. The assessment of the EU ETS should – in light of the outcome of negotiations in ICAO - include a review of the pros and cons of the continuation of the EU ETS, including competitive distortion between operators, environmental benefits, legal consequences and political consequences.
Which options should be considered for the EU ETS for the period 2017-2020?
In light of the elements contained in a potential agreement by ICAOs General Assembly in September 2016 the European Commission should report to the European Parliament and Council and propose measures as appropriate to take international developments into account with effect from 2017. Potential measures depend on the outcome of the ICAO Assembly. The options to be considered should include a continuation of the present “Stop The Clock”-scheme, if the ICAO process produces fruitful results.
Which options should be considered beyond 2020?
Potential EU measures beyond 2020 depend on the outcome of the September 2016 ICAO Assembly and whether a GMBM will be in operation beyond 2020. The long term solution should be one global solution, preferably a GMBM.
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
The Commission’s November 2015 Carbon Market report documents that a huge surplus of emission allowances for stationary installations has accumulated in the ETS due to over-allocation and furthered by extensive use of external credits from projects carried out under the flexible mechanisms of the Kyoto Protocol. There is therefore a need to strengthen the ETS through further structural reforms.
Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) should continue to be exempted due to the disproportional high administrative costs of inclusion. In considering any alternative measures, it should be ensured that the potential effects are proportional to the administrative costs of aircraft operators and national authorities.
Submit any other comments you may have.
This is a continuation of the Danish response to the first question: Denmark finds that a solution with one global market based measure best secures both an effective environmental outcome as well as minimizes the risk of market distortions. The March 2016 ICAO Draft Assembly GMBM-proposal (Global Market Based Measure) of the President of ICAO suggests carbon neutral growth by 2020 and applies until the end of 2035. The suggestion is that international aviation should offset emission growth beyond the 2020 emission level through buying emission reduction credits. The suggested GMBM is due for an extensive review by 2032, and furthermore the proposal includes a review every 3 years. The present proposal is, in Denmark’s view, largely in line with the targets proposed by IATA. Denmark would also emphasize the need for developing and using new advanced aircraft technologies and suggests that attention should be paid to the use of 2nd generation biofuels in aircraft.

Name of the individual or organisation
Finland/Ministry of Transport and Communications
Capacity in which the individual/organisation is completing Questionnaire
Public authority
Please give your country of residence/establishment
Finland
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
International aviation sector should meet the ambition level of the Paris Agreement. This goal should be reached through the so called basket of measures set by ICAO; <ul style="list-style-type: none"> • Optimization of airspace use and aircraft operations • Improvement of fuel efficiency via fleet renewal • Deployment of sustainable alternative fuels • Offsetting of CO2 emissions growth via a global market-based measure
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<ul style="list-style-type: none"> • Global route-based system • Non-discrimination between aircraft operators on the same route • Environmental integrity • Accommodation of the Special Circumstances and Respective Capabilities (SCRC) of states • Periodic review of the performance and effectiveness of the GMBM • Robust monitoring, reporting and verification rules • Transparent eligibility criteria for high-quality emission units • Administratively simple system • Support and capacity building
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
In domestic aviation CO2 emission reductions should be accomplished through optimization of airspace use and aircraft operations, improvement of fuel efficiency via fleet renewal and deployment of sustainable alternative fuels. Especially sustainable alternative fuels offer huge but yet almost untapped potential to cut CO2 emissions. Supportive actions are needed to increase the use sustainable alternative fuels. It is also very important that the European and global decision makers understand the differences in sustainability of different production methods and different raw ingredients that are used to produce alternative fuels. The sustainability of certain raw ingredient also varies greatly within EU due to the differences in geography and typical vegetation.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
In its original scope the EU ETS caused serious problems for many flight operators due to the difficulties with, for example, over flight permits. Similar situations must be avoided in future.
Which options should be considered for the EU ETS for the period 2017-2020?
The EU ETS should cover only intra-EEA flights in order to avoid the problems caused by the original scope.
Which options should be considered beyond 2020?
International aviation should be covered by single global MBM. The aviation sector has a strong international character and therefore the approach should be global to avoid market distortion. Only the global approach can make a meaningful contribution to climate change mitigation and ensure sustainability in the long term. A combination of global and regional MBMs will increase administrative burden and will most likely distort competition.
According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?
If a global agreement on MBM is reached in the 39th ICAO assembly it is not recommendable that considerable changes are made in EU ETS before the start of the GMBM. Otherwise it would impose unnecessary administrative burden on flight operators preparing for the start of the GMBM.

Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?
Yes, to avoid a disproportionate administrative burden for the smallest flight operators (2021 onwards this question should be decided in GMBM). The use of sustainable alternative fuels should be supported so that it becomes widespread.

48.

Name of the individual or organisation
Ministry of National Development, Hungary
Capacity in which the individual/organisation is completing Questionnaire
Public authority
Please give your country of residence/establishment
Hungary
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
International civil aviation has always showed great commitment in participating in the mitigation of its own carbon footprint. Nonetheless, in 2013 upon Assembly Resolution A38-18, a world-wide collaboration has emerged aiming at creating a market based mechanism with a global coverage. The recent signature of the Paris Agreement supports the original goals of ICAO. Efforts now shall be made by ICAO and its Member States during the upcoming Assembly and the technical negotiations. These efforts shall aim at a compromise in order to agree on the framework of the mechanism as outlined in the President's Proposal for a draft assembly resolution.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
1) Governance and central registry 2) MRV and EUC rules that are not too complex 3) Phase-in and exemptions without endangering the amount of emissions to be addressed 4) Route-based implementation 5) Review
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Introduction of appropriate national schemes might be a solution especially in countries with significant amount of domestic air transport. However, it must be ensured that national schemes are complementing and feeding into a global mechanism, therefore, MRV and registry criteria should be as unified as possible in order to avoid duplication of administrative burdens on states and operators.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Efforts should be focused on making the ETS conciliate with the accepted system of the GMBM as much as possible minimising administrative burden and avoiding unnecessary complexity. Proper answer can be provided to this question once the outcome of the 39th ICAO Assembly is known in relation to the global market based measure. However, the review of the EU ETS in light of the 39th ICAO Assembly must take the volatile market conditions of European air carriers into consideration without putting extra burden on EU carriers which might unnecessarily distort the global aviation market by favouring those carriers operating outside the territory of the European Union.
Which options should be considered for the EU ETS for the period 2017-2020?
Upon the adoption of an Assembly resolution on GMBM, the further 'stop-the-clock' of the EU ETS similarly to the current situation might be considered by the European Commission.
Which options should be considered beyond 2020?
Upon a well-functioning GMBM scheme the fade-out option might be one solution to avoid the duplication of administrative burden on states and operators (MRV, registry). In an opposite scenario, EU ETS must continue to function with full scope again in order to fulfil the goals laid down in the Paris Agreement, if the GMBM proves to be insufficient for that in itself.

Name of the individual or organisation
Belgium: joint submission by the Federal and Regional transport and environment authorities
Capacity in which the individual/organisation is completing Questionnaire
Public authority
Please give your country of residence/establishment
Belgium
Please indicate your preference for the publication of your response on the Commission's website
Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication
Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?
As a minimum requirement, the resolution to be agreed by the General Assembly in September 2016 must achieve Carbon Neutral Growth 2020, as already agreed by the ICAO Assembly in 2010 and 2013. This CNG 2020 is a first step, but will not be enough to have the international aviation sector contribute a fair share to the Paris goals. The ambition level for international aviation needs to be strengthened over time, in line with the Paris agreement to keep a global temperature rise this century well below 2°C above pre industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre industrial levels Belgium would like to recall the Council conclusions of 31 October 2009, considering that the global reduction targets for greenhouse gas emissions from international aviation should have been set to -10 per cent below 2005 levels by 2020.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
<ul style="list-style-type: none"> - Carbon Neutral Growth from 2020 for the aviation sector as a whole, not undermined by a phased approach and exemptions. - Periodic review of GMBM + option to strengthen ambition level in line with the Paris agreement and its long-term temperature goal + basis for a long term commitment for international aviation after 2035 (as requested by ICAO Assembly resolution from 2013). This gradual increase of the ambition level should be aligned with the timing of the ambition cycle under UNFCCC and should be considered as part of the Global Stocktake (art. 14 Paris Agreement). - No discrimination based on state of operator, but taking into account the SC-RC principle. - Robust rules for monitoring, reporting and verification, consistent with reporting under UNFCCC. - Clear criteria for offsetting units, ensuring environmental integrity and avoiding double counting. - Clear definition of responsible entity, clear rules for new entrants and closures; and clear compliance provisions.
In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?
Domestic aviation should contribute to the Paris goals. Belgium is in favor of a balanced reduction policy measure, minimizing administrative burden and keeping this burden in balance with the environmental benefits and the direct reduction costs. The MRV burden for domestic flights could be minimised by using the ICAO MRV structure for these flights as well, or by using EU ETS Support Facility data, without verification. Which obligation operators should have based on their emissions (pay tax, surrender allowances, other) should be evaluated on environmental benefit, simplicity and cost effectiveness. An alternative for buying credits or taxing could be to investigate the feasibility of obliging operators to use sustainable biofuels for a certain percentage of the fuel used for domestic flights (based on purchase records "Book & Claim system"). This is a system which could also stimulate the take off of the aviation biofuel market.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Criteria to be used: <ul style="list-style-type: none"> - Is CNG 2020 achieved by the GMBM? If not completely, are the (minimal) (temporal) deviations from the CNG2020 due to exemptions and phase ins acceptable? - Does the resolution include the possibility to strengthen the ambition level over time? - Is the environmental effectiveness of the GMBM ensured by the quality of MRV and offsetting? Are clear, robust and durable rules for both MRV and offsetting included in the resolution, ensuring the environmental integrity of the system and avoiding double counting? - Does the ICAO resolution put restrictions on the EU ETS?
Which options should be considered for the EU ETS for the period 2017-2020?
If the answer to the first three bullet points in the reaction to the question above is YES, the option to be considered is: EU ETS with intra EEA scope until 2020.
Which options should be considered beyond 2020?

<p>CNG 2020 is not sufficient to have the international aviation sector contribute to the Paris goals in a fair manner. Therefore it should be considered to implement an additional EU ETS for intra EEA flights with stronger ambition. This consideration of an additional EU ETS should be done carefully, as it may not jeopardize the GMBM.</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>For the improvement of the environmental effectiveness:</p> <ul style="list-style-type: none"> - Increase auctioning percentage (cfr. Stationary installations) - Lower emission cap (cfr. Stationary installations) <p>Taking into account international developments:</p> <p>Evaluate which adjustments to the EU ETS are needed to include the new international offset mechanism established by the Paris agreement.</p>
<p>Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO2 per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?</p>
<p>Yes, the threshold of 1000 tonnes for small non-commercial aircraft operators should remain part of the EU ETS.</p> <p>It could be considered to have the operators, excluded as a result of this threshold, pay an emission charge per ton, based on EU ETS support Facility data.</p> <p>An alternative could be to investigate the feasibility of obliging such operators to use sustainable biofuels for a certain percentage of the fuel used (based on purchase records "Book & Claim system"). This is a system which could also stimulate the take off of the aviation biofuel market. However the use of sustainable biofuels must be accompanied by robust and standardized monitoring, reporting and verification rules, in order to avoid double counting; and by stringent social, environmental and sustainability criteria.</p>
<p>Submit any other comments you may have.</p>
<p>When reviewing the EU ETS in 2016, the revised ETS directive or the Monitoring and Reporting Regulation should allow aircraft operators emitting less than 100 or 500 tonnes of CO2 in the intra-EEA scope to use the simplified monitoring method (i.e. use ETS Support Facility data without verification to fulfill their reporting requirements).</p> <p>Almost every year Belgium administers a large aircraft operator (> 25 000 ton CO2 per year) who is included in the (full) EU ETS scope, according to Annex I of the directive, but who – under normal conditions- does not perform any intra EEA flights. When such an operator has a diverted flight due to weather conditions, leading to an unexpected intra EEA flight, this operator cannot use the simplified reporting method, because he is not below 25.000 ton CO2 full scope. This operator then has to monitor, report and pay for external verification just for one flight. This approach does not respect the proportionality principle.</p>

50.

<p>Name of the individual or organisation</p>
<p>The French authorities (Permanent Representation of France to the European Union)</p>
<p>Capacity in which the individual/organisation is completing Questionnaire</p>
<p>Public authority</p>
<p>Please give your country of residence/establishment</p>
<p>France</p>
<p>Please indicate your preference for the publication of your response on the Commission's website</p>
<p>Under the name given: I consent to publication of all information in my contribution and I declare that none of it is subject to copyright restrictions that prevent publication</p>
<p>Following the Paris Agreement and considering the agreed long-term goal, what kind of effort should come from international aviation and how should this develop over time?</p>
<p>France considers that the ICAO objective of neutral carbon growth from 2020 is an important first step which must be achieved at the 39th Assembly. It involves stabilising global net CO2 emissions for international aviation, whose traffic is increasing by an average annual rate of 5% and thereafter, to propose a progressive reinforcing of environmental objectives. In the spirit of the Paris Agreement, France pleads for a regular review mechanism of the measure's climate ambition in order to increase the contribution of the aviation sector in reaching a peak of global emissions as early as possible and towards their cancellation in the second half of the century.</p> <p>France encourages the acceleration of real emissions reduction efforts which aviation can accomplish by means</p>

<p>of other levers in the basket of measures (technology, aviation operations, sustainable alternative fuels), complimentary to the GMBM.</p>
<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p>
<p>International aviation must contribute to the fight against climate change, particularly following the long term objectives fixed by the Paris Agreement. France considers that the environmental benefits resulting from international aviation's commitments will not be achieved in the framework of a decision by the entire international community in order to provide the necessary dynamism and therefore the highest environmental ambition for the climate. These discussions are currently taking place at the ICAO level.</p> <p>A robust GMBM in 2020 must have the following characteristics:</p> <ul style="list-style-type: none"> - Must be global - Must permit the reaching of the objective of carbon neutral growth from 2020 - Must provide for a regular review of the ambition - Must be non-discriminatory between airline companies on the same route - Must be founded on a robust Monitoring, Reporting and Verification system - Must only accept credits of a high environmental standard.
<p>In what ways could action being taken by countries and groups of countries to achieve their respective climate goals, notably by addressing emissions from domestic aviation, complement and interact with a GMBM addressing emissions from international aviation?</p>
<p>Aviation being international by definition, France considers that the GMBM must not interact nor take part in the contributions of each state pursuant to their climate commitments. However, states should be inspired by concepts developed within ICAO which deal with issues linked to their domestic emissions, in particular via technological progress, the optimisation of aviation operations or the development of biofuel use. On the GMBM side, other economic measures must be put in place to deal with domestic aviation which may be founded upon the same administrative requirements as the GMBM in order to minimise administrative costs for companies and to simplify and harmonise the processes. In a general sense, the GMBM is an incentive for all air transport actions to improve their energy efficiency and to implement the entirety of the levers in the ICAO basket of measures.</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>A revision of the EU-ETS must pursue the following objectives:</p> <ul style="list-style-type: none"> - Have a deepened discussion, linked to the evolution of the negotiations at ICAO, on the future of the EU ETS for aviation; - Ensure, for domestic flights, that the EU ETS remains the tool with the best cost-efficiency ratio to deal with the question of CO2 emissions from aviation and to evaluate whether other measures would not be more appropriate. - Adapt the administrative requirements in order that they can be harmonised with both the GMBM and the EU ETS.
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>Starting from the premise that an agreement will be reached on the GMBM at the ICAO Assembly in 2016, the period 2017-2020 must be put to use to prepare for the implementation of the GMBM from 2020 and to adapt the EU ETS as a result. Also, during the period 2017-2020, and while waiting for the implementation of the GMBM, France considers that the geographic parameters of the EU ETS must not revert that that which initially applied in 2012 (at the departure from, or the arrival to European Economic Area aerodromes). Furthermore, the exemption provided for by EU Regulation 421/2014 for flights originating from, and destined for outermost regions must be maintained.</p>
<p>Which options should be considered beyond 2020?</p>
<p>After 2020, France will look to the GMBM to deal with all the emissions from international flights and, in parallel, the need to satisfy European goals with respect to the contribution of the air sector, in favour of the climate. France therefore considers that it will be necessary to analyse the effects of the GMBM on the contribution of the aviation sector with regard to European emissions reduction ambitions defined in the political agreement under the 2030 energy-climate framework which had served as the basis of the European Union's contribution to the Paris Agreement. Furthermore, France hopes that the treatment of CO2 emissions from domestic aviation will be examined within European Union Member States.</p> <p>To respond to these major concerns, a deeper analysis is necessary (see the last question).</p>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should "swiftly propose measures in order to ensure that the international developments can be taken into account", and "give particular consideration to the environmental effectiveness of the EU ETS (...), including better alignment of the rules applicable to aviation and stationary installations respectively". Which elements of EU ETS could be considered in order to take into account international developments as well as to improve its environmental effectiveness (e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.)?</p>
<p>During the period 2017-2020, there ought to be studies into the possibility of air companies to progressively</p>

acquire eligible emissions units through the GMBM to fulfil their obligations vis-à-vis the EU ETS in order to progressively adapt to procedures which will be in place in the framework of a global mechanism from 2020. This measure should facilitate the emergence and the growth of medium-term or long-term programmes which should be eligible under the GMBM.

[Should small non-commercial aircraft operators \(emitting less than 1000 tonnes of CO2 per year\) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?](#)

Small non-commercial operators and small commercial operators alike must continue to be exempt. Otherwise, the exemptions under the EU ETS and the GMBM must be harmonised meaning that operators emitting less than 10,000 tonnes of CO2 per year must equally be exempted.

[Submit any other comments you may have.](#)

The European policy on the fight against climate change with respect to aviation must take into account the necessity of benefiting from a wide international consensus in order to obtain the highest environmental efficiency and to favour multilateral discussions to promote the European goal of reducing CO2 emissions. Concerning the deepened analysis into the question of post-2020 events, which has been evoked, the analysis should:

- Examine the effects of substituting the EU ETS by the GMBM for international, intra-European flights, particularly with regard to the European objective of emissions reductions and to ensure the attainment of the European ambition;
- Examine the retention of the EU ETS and the alternative solutions to deal with domestic emissions;
- Harmonise the administrative requirements of the ETS and the GMBM, in analysing the impact of the envisaged solutions on costs.