

## Anonymous responses to "consultation on market-based measures to reduce the climate change impact from international aviation" from individuals and organisations

### 1.

Capacity in which the individual/organisation is completing Questionnaire
Private enterprise
Please indicate the sectors your organisation represent
Biofuel producer
Please give your country of residence/establishment
France
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?
Every actors in the sector directly and not have to bring their contribution. To get the target of saving 1 billion metric tons of CO2 annually by 2050, aviation biofuel is a solution. Also biofuel give an energetic independence for aviation Company. R&D department in aviation Company should work on sustainable biofuel to reduce emission greenhouse gas
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Need introduce minimum level of biofuel incorporation
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 increase in the use of biofuels for aviation can contribute significantly to the reduction of GHG emissions in this sector. But to develop aviation biofuels, governments should encourage new investment for more production and using extra biomass (as waste & residues). and also create law to push using of biofuel for aviation sector.
Which options should be considered for the EU ETS for the period 2017-2020?
For now, price of carbon is very low, but this situation will change in every case. But it's the good time to think about future and prepare incorporation of biofuels in aviation transport.
Submit any other comments you may have.
R&D for biofuel aviation is necessary. And those projects should benefit from help and funding from EU

### 2.

Capacity in which the individual/organisation is completing Questionnaire
Private enterprise
Please indicate the sectors your organisation represent
Airline
Business Sector
Yes - medium-sized enterprise
Please give your country of residence/establishment
Hong Kong
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?
Aviation is vital to world economy, supporting 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 our society, particularly in the developing world, whilst at the same time addressing its carbon emissions in line with what is economically reasonable and technologically feasible. As recognised in the Paris Agreement, international aviation emissions should be addressed at the international level under the auspices of ICAO. Cathay Pacific calls on governments to reach an agreement on a global

<p>market-based measure (GMBM) to complement technology, operational and infrastructural measures, and to cap net carbon emissions from international aviation at 2020 levels.</p>
<p><a href="#">Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</a></p>
<p>Key design elements of the GMBM to be agreed in 2016 should include potential provisions for differentiation at State-level (phase-in), fair allocation of offset obligations at operator level and technical exemptions (i.e. potential adjustments for specific categories of operators). In addition, ICAO Assembly should reach an agreement on initial guidance for monitoring, reporting and verification (MRV) requirements as well as for the eligibility of emissions units.</p>
<p><a href="#">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?</a></p>
<p>Cathay Pacific strongly believes that implementation of the GMBM should obviate the need for existing and new economic measures to be applied to international aviation emissions. In terms of emissions from domestic aviation, it is up to individual States to explore options that best suits individual countries circumstances. Having said that, preference should be given to focus on optimising procedures and infrastructures and including promoting sustainable alternative fuels, if relevant. If individual States wishes to pursue market-based measures for domestic aviation, it should preferably be aligned and compatible with the GMBM to the greatest extent possible with the aim to avoid regulatory fragmentation and minimise the administrative burden for operators and potential market distortions.</p>
<p><a href="#">Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</a></p>
<p>We believe that priority should be the implementation of GMBM and completion of the work in ICAO. It is expected that the adoption of GMBM will replace the EU ETS legislation currently applicable to all international flights within the EEA. Our concern is that if the EU ETS is reintroduced to flights between the EEA and third countries, other ICAO States would perceive this as a step back from the agreement reached in ICAO. Whilst it is not for us to comment on how the EU ETS should be applied to flights within the EEA for EEA registered operators, we strongly believe that upon the implementation of the GMBM, any intra EEA flights operated by NON- EEA registered operators should fall under the GMBM. In that sense, there should not be a need for non-EEA operators to continue to participate in the EU ETS scheme as they do currently. This will ensure operators are not regulated twice (or more) by separate overlapping measures and subjected to duplication of administrative obligations.</p>
<p><a href="#">Which options should be considered for the EU ETS for the period 2017-2020?</a></p>
<p>Cathay Pacific believes that the adoption of Regulation 421/2014 has contributed to creating a positive setting for negotiations in ICAO. An extension of the application of the regulation, or indeed suspending it for the period 2017-2020, would have a similarly beneficial effect and avoid any political and resource distractions from the remaining tasks (e.g. finalisation of MRV requirements in ICAO, adoption of national legislation to implement 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 on international aviation.</p>
<p><a href="#">Which options should be considered beyond 2020?</a></p>
<p>As described above, in our 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. What to do with the domestic flights is a decision for the EEA community but we would imagine any scheme applicable to domestic flights should be aligned and made compatible with the GMBM to avoid regulatory fragmentation, reduce the administrative burden for operators and Governments, and minimise potential market distortions.</p>
<p><a href="#">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.)?</a></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. With respect to eligible credits under GMBM, the definition and criteria of allowances should be aligned with criteria set out under GMBM (albeit in development at the moment) as well as any new mechanism established by Paris Agreement or other notable carbon markets. This should ensure that credits generated can be potentially fully transferable and tradable- thereby creating a uniform and accessible carbon market for aviation industry.</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>Cathay Pacific believes exemptions are appropriate to avoid placing a disproportionate administrative burden on operators that only account for a very small quantity of carbon 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>We would like to reiterate our views from the perspective of a non-EEA registered operator, that in the event of an ICAO GMBM agreement, the scope of the EU ETS should exclude all flights (including intra-EEA) operated by non-EEA operators. Emissions from these flights would be covered under the GMBM. This would help avoid duplication and additional administrative burden on these operators.</p>

### 3.

<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>European Aviation Sector</p>
<p>Where is your company located?</p>
<p>Germany</p>
<p>Please give your country of residence/establishment</p>
<p>Germany</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 Paris Agreement can be seen as a bridge between today's policies &amp; 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 &amp; 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 &amp; 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. LHG makes a strong call on Governments to reach agreement on GMBM to complement technology, operational &amp; infrastructure measures &amp; to cap net CO2 emissions.</p>
<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p>
<p>In LHG'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. LHG 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 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>

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, LHG 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.

Whilst recognizing that domestic aviation is beyond the scope of the GMBM, LHG 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.

For Germany, a system to limit the domestic flights would not be necessary because of the emissions decline for years: since 1990, a reduction of 16 percent was achieved.

[Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?](#)

LHG 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 ICAO Member States would perceive this as a step back from the agreement to be reached in ICAO.

LHG 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.

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?](#)

In LHG'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 LHG'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.

For Germany, a system to limit the domestic flights would not be necessary because of the emissions decline for years: since 1990, a reduction of 16 percent was achieved.

[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 \(e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.\)?](#)

In LHG'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.

For Germany, a system to limit the domestic flights would not be necessary because of the emissions decline for years: since 1990, a reduction of 16 percent was achieved.

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, LHG 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.

#### 4.

Capacity in which the individual/organisation is completing Questionnaire

Civil society organisation

Please indicate your main area of focus

Reducing aircraft noise and air pollution from flights in Hamburg, Germany.

Please give your country of residence/establishment

Germany

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 aviation emissions have the most severe climate impact, air traffic clearly must be reduced.

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 which is decreased in accordance with the already agreed objectives up to 2050. Free allocations must be restricted to a minimum.

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 must be strictly avoided. No biofuels and no offsets from projects with fossil fuels and agriculture and forestry.

No national subsidies or offsets for certificates. 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.

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 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. They must also develop programmes and objectives that are consistent with the Paris climate objectives.

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.

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

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.

As the European aviation market is already (over-)developed, it must make a significant contribution to the real cuts in emissions in this sector.

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.

<a href="#">Which options should be considered for the EU ETS for the period 2017-2020?</a>
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.
<a href="#">Which options should be considered beyond 2020?</a>
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. 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.
<a href="#">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?</a>
In principle, exemptions of emitters should be avoided. Where necessary, simplified measures for the emission calculation and reporting can be considered for small emitters.
<a href="#">Submit any other comments you may have.</a>
The influence of lobby firms should to be countered more vigorously.

## 5.

<a href="#">Capacity in which the individual/organisation is completing Questionnaire</a>
Civil society organisation
<a href="#">Please indicate your main area of focus</a>
Noise abatement for citizens; prevention of 3rd runway in Vienna
<a href="#">Please give your country of residence/establishment</a>
Austria
<a href="#">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?</a>
Air traffic is more damaging to the environment than ground traffic. The former must in future make a significant contribution to reducing greenhouse gases. Climate research therefore forecasts a temperature increase, which has partly already occurred. A further uncurbed increase of CO2 and other greenhouse gases in the atmosphere through 'business as usual' could lead to a dangerous rise in temperature by several degrees Celsius. The Earth's climate is what is known as a 'complex system' with many feedback effects and possible 'tipping points'.
<a href="#">Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</a>
A strict cap for all emissions from aviation must be adopted. The aviation sector must be included in the emissions trading system without exception. Alternative fuels or similar reduction measures should be supported. A corresponding incentive scheme will help to speed up alternatives.
<a href="#">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?</a>
The rules of individual countries should complement the GMBM objectives. Tax exemptions and tax breaks for aviation should be abolished.
<a href="#">Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</a>
Full inclusion of air transport; development of alternatives to the current propulsion systems; raise awareness of the damage to the climate caused by air transport.
<a href="#">Which options should be considered for the EU ETS for the period 2017-2020?</a>
This provision should apply to all flights within the EU; no derogation
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.)?
All measures and assessment criteria will be available publicly and comprehensibly.
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?
No
Submit any other comments you may have.
The project of the 3rd runway in Vienna is based on the continuation of 'business as usual' and it is not to be made 'climate friendly' by offsetting measures. This is in contradiction with the much needed reduction of GHG emissions, to achieve the important 2°C objective. The aviation industry cannot grow without limit at the expense of others and the environment!

## 6.

Please give your country of residence/establishment
United Kingdom
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?
I teach a group of undergraduate students at the University of Leeds on issues of environmental governance. As a group, we would like to appeal to you to show support for ICAO plans for a GMBM. We believe that a global market based mechanism can be an effective way to regulating aviation emissions, and that the ETS is proof of this. However, we also recognise that an effective market based mechanism, must be based on ambitious limit setting. As a minimum, we feel that the ICAO must set emissions limits at the projected 2020 emissions level and that there may be need for intervention in order to ensure that a competitive emissions price is maintained. We also recognise the need for market mechanisms to be accompanied by enforcement and strict financial penalties for emitting beyond permits. We would further like to make the case that capital raised from penalties should be invested

## 7.

Please give your country of residence/establishment
Netherlands
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?
Convert the IATA 2050 Targets ( <a href="http://www.iata.org/policy/environment/Pages/climate-change.aspx">http://www.iata.org/policy/environment/Pages/climate-change.aspx</a> ) into a binding commitment.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Agreement in principle on * Minimum sustainability criteria of renewable jet fuel * CO2 emission accounting methodology * Verification process * Baseline emissions by Party * Allocation methodology * Options for MBMs.
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?
Promote use of renewable jet through e.g. mandates, variable ATM and airport fees.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Ensure compatibility of EU ETS with ICAO GMBM.
Which options should be considered for the EU ETS for the period 2017-2020?
Suspension of EU ETS for Intra-European flights, or Free Allocation of Allowances for Intra-European Flights.
Which options should be considered beyond 2020?

<p>Exempt aviation from EU ETS if ICAO GMBM applies.  Subject EU internal flights to EU ETS and exempt from ICAO GMBM.  Integrate ETS fully with ICAO 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>In view of the diversity in INDCs under the Paris Agreement, it seems unlikely that a single global carbon market will emerge for all installations. Preference should be given to the lowest cost options and avoidance of distortions in the carbon markets which could lead to a competitive disadvantage for European Airlines. The options identified for beyond 2020 (above) should be considered seriously.</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, a de minimis exemption would seem justified. As an alternative measure a fuel tax corresponding to the average implied carbon price under the EU ETS should be considered.</p>

## 8.

<p>Please give your country of residence/establishment</p>
<p>Austria</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 traffic is the most toxic one. The reduction of aviation pollution must have the top priority. Limits to airplane use must be set if necessary.</p>
<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p>
<p>Air traffic must be regulated by emissions trading. The limits must be related to climate related exhausts (by defined caps). These caps are to be defined internationally according to the 2020 emissions targets and to be reduced in the following years until 2020 as agreed in the climate regulations.</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 regulations on all countries must complete the GMBM, so that emissions from air traffic are covered completely. We must take care that the decisions by ICAO ensure that this objective is met.</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 confidence in EU-ETS must be increased again. All climate related emissions must be included.</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>From 2017 onwards the EU-ETS should - as originally planned – consider all flights within and outside the EU to account for environmentally damaging emissions.</p>
<p>Which options should be considered beyond 2020?</p>
<p>Because the GMBM is on to cover the air traffic emission problems not really effective, the international flights must keep covered. For partial by GMBM covered flights, the not reported emissions should be included. The limit of allowed emissions must be as strict as for local installations at least.</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>Exceptions from aviation emissions regulation should be avoided in general.</p>

## 9.

Please give your country of residence/establishment
Germany
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?
Limitation of air traffic as necessary, no cheap flight offers, no subsidization of air traffic or of fuel.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Reduction of fuel consumption and of aircraft noise, expansion of night flight bans.
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?
Limitation of the air traffic on the necessary amount, no cheap airmen offers, no subsidization of the air traffic and the fuel
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Limitation of the air traffic, no subsidization of the air traffic and the fuel
Which options should be considered for the EU ETS for the period 2017-2020?
Limitation of the air traffic, no subsidization of the air traffic and the fuel
Which options should be considered beyond 2020?
additionally reduction of the fuel consumption per aircraft and the aircraft noise
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.)?
Same as described 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?
No!

## 10.

Capacity in which the individual/organisation is completing Questionnaire
As an individual / private person
Please give your country of residence/establishment
Germany
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 CO2, 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 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.

[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 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.

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.

[Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?](#)

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.

As the European aviation market is already (over-)developed, it must make a significant contribution to the real cuts in emissions in this sector.

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.

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

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.

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

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.

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.

[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 \(e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.\)?](#)

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.)?

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?
Should small, non-commercial aircraft operators (emitting less than 1,000 tonnes of CO2 per year) continue to be exempt from the EU legislation? If so, what alternative measures should, if needed, be considered? In principle, exemptions of emitters should be avoided. Where necessary, simplified measures for the emission calculation and reporting can be considered for small emitters.
Submit any other comments you may have.
Make use of this opportunity and restore the credibility of the European Commission and the trading system through the inclusion of aviation in the ETS.

## **11.**

Please give your country of residence/establishment
Austria
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 CO2, 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 which is decreased in accordance with the already agreed objectives up to 2050. In so far as sectors are temporarily exempt from participating in the GMBM, their emissions must also be offset by the participants. Free allocations must be restricted to a minimum. 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. Similarly, the criteria for the evaluation of alternative fuels concerning CO2 reductions eligible for offsetting must be strict; all other climate-relevant emissions must be offset independently of this. Double counting of offsets must be strictly avoided. Double counting of offsets, must be strictly avoided.
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?
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Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
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>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><a href="#">Which options should be considered for the EU ETS for the period 2017-2020?</a></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><a href="#">Which options should be considered beyond 2020?</a></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><a href="#">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?</a></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><a href="#">Submit any other comments you may have.</a></p>
<p>The airlines must finally have to pay the external costs which they cause and it is unacceptable that VAT is charged on the tickets for the 13 times more environmentally friendly railways – and not on plane tickets! For the much more environmentally harmful flights, provision should be made for a higher VAT rate on tickets than for the railways!</p>

## **12.**

<p><a href="#">Please give your country of residence/establishment</a></p>
<p>Austria</p>
<p><a href="#">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?</a></p>
<p>The aviation sector must in any case contribute. The efforts to make engines less polluting have so far been focused only on saving fuel costs. The aviation sector with its strong lobby believes it can claim a special status.</p>
<p><a href="#">Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</a></p>
<p>The aviation sector must be fully included in the emissions trading system. The vital objectives for humanity will never be achieved if everyone is granted exceptions.</p>
<p><a href="#">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?</a></p>
<p>Countries and groups of countries must devise regulations for air transport which complement the GMBM in such a way that all emissions from aviation are fully covered. Programmes and objectives must be developed in line with the Paris climate objectives.</p> <p>A shift must be made to more environment-friendly modes of transport.</p>
<p><a href="#">Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</a></p>
<p>If it is to become a reality that everyone pulls together, the will to achieve the objectives must be clearly shown. This cannot happen when everyone asking for an exception is granted one.</p>
<p><a href="#">Which options should be considered for the EU ETS for the period 2017-2020?</a></p>
<p>The EU ETS should, as planned, from 2017 cover all flights within, into or out of the European Economic Area.</p>
<p><a href="#">Which options should be considered beyond 2020?</a></p>
<p>It should be ensured that all emissions caused by air traffic internationally are covered.</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?

All exemptions must be avoided.

### 13.

Please give your country of residence/establishment

Germany

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<sub>2</sub>, 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 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.

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 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. 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.

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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.

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

The EU ETS should, as initially planned, as from 2017 again cover all flights within, into or out of the European

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<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>
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In principle, exemptions of emitters should be avoided. Where necessary, simplified measures for the emission calculation and reporting can be considered for small emitters.
<a href="#">Submit any other comments you may have.</a>
<p>After the EU ETS was ruined by various factors, I am very pessimistic that global emissions trading will work. The interest of the economy in short-term profits is so great that the loopholes in a trading system will be found and used. This may happen both at national and international level. Unfortunately, we have no more time to try out systems, such as a GMBM, to reduce greenhouse gases. We must reduce emissions of pollutants which harm the environment now!!</p>

#### **14.**

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Austria
<a href="#">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?</a>
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<p>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>
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<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><a href="#">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?</a></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><a href="#">Submit any other comments you may have.</a></p>
<p>In principle, the cost of air transport should reflect the real impact on the environment and all current preferential treatment in terms of cost of air transport compared with other modes of transport should be abolished.</p>

## 15.

<p><a href="#">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?</a></p>
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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.

[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?](#)

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[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 principle, exemptions of emitters should be avoided. Where necessary, simplified measures for the emission calculation and reporting can be considered for small emitters.

Submit any other comments you may have.

The airlines must finally have to pay the external costs which they cause and it is unacceptable that VAT is charged on the tickets for the 13 times more environmentally friendly railways – and not on plane tickets! For the much more environmentally harmful flights, provision should be made for a higher VAT rate on tickets than for the railways!

## 16.

Please give your country of residence/establishment

Germany

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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. Similarly, the criteria for the evaluation of alternative fuels concerning CO<sub>2</sub> reductions eligible for offsetting must be strict; all other climate-relevant emissions must be offset independently of this. Double counting of offsets, for example for national targets too, must be strictly avoided. 'First generation' biofuels and offsets from projects with fossil fuels and agriculture and forestry should be excluded.

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?

Use should be made of the instrument of the shift from air transport to more environment-friendly modes of transport. 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.

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Austria
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The GMBM must contain a strict cap from 2020 for all greenhouse gas emissions from international aviation 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-curling 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.
<a href="#">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?</a>
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. 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.

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

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.

As the European aviation market is already (over-)developed, it must make a significant contribution to the real cuts in emissions in this sector.

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.

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

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.

Which options should be considered beyond 2020?

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.

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.

Should small non-commercial aircraft operators (emitting less than 1000 tonnes of CO<sub>2</sub> per year) continue to be exempted from the EU legislation from 2021 onwards? If so, what alternative measures, if any, should be considered?

In principle, exemptions of emitters should be avoided. Where necessary, simplified measures for the emission calculation and reporting can be considered for small emitters.

## 18.

Please give your country of residence/establishment

Austria

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?

Due to the particular climate damage of its emissions, international aviation must contribute to the reduction of greenhouse gas emissions. Aircraft emit CO<sub>2</sub>, as well as nitrogen oxides, ozone, sulphates, soot and water vapour, *inter alia*, which especially at high altitudes give rise to specifically greater climate change impacts and a great deal of noise, detrimental to health. Reduction schemes for these emissions must pursue the aim of limiting the temperature increase to well below 2 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 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 which is decreased in accordance with the already agreed objectives up to 2050. In so far as sectors are temporarily exempt from participating in the GMBM, their emissions must also be offset by the participants. Free allocations must be restricted to a minimum.

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. Similarly, the criteria for the evaluation of alternative fuels concerning CO<sub>2</sub> reductions eligible for offsetting must be strict; all other climate-relevant emissions must be offset independently of this. Double counting of offsets must be

strictly avoided.
<a href="#">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?</a>
<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 (and implement!) programmes and objectives that are consistent with the Paris climate objectives.</p> <p>In particular, use should be made of the shift from air transport to more environment-friendly modes of transport, in which 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.</p> <p>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>
<a href="#">Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</a>
<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>
<a href="#">Which options should be considered for the EU ETS for the period 2017-2020?</a>
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.
<a href="#">Which options should be considered beyond 2020?</a>
<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>
<a href="#">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.)?</a>
The auctioning of the allowances and the reduction of the number of allowances would seem to be the most effective measures in this sense.
<a href="#">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?</a>
No
<a href="#">Submit any other comments you may have.</a>
The EU urgently needs to do all it can to help ensure that the unfair and distortive preferential tax treatment of air transport and the aviation industry as a whole are terminated (value added tax on airline tickets, full energy tax on aviation fuel, special tax rules for airports, etc.) and that in addition to air pollution, the harmful heavy pollution through aircraft noise in many airport regions is also reduced.