

Responses to "Consultation on market-based measures to reduce the climate change impact from international aviation" from individuals and from organisations not registered in the EU Transparency Register

1. Hallfarth, Dagmar	16. Arab Air Carriers Organization
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7. Karl Sperker	22. Verkhersclub der Schweiz
8. Grazyna König	23. Asociación Compañías Españolas de Transporte Aéreo
9. Elisabeth Kolb	24. Comitato Fuori PISTA
10. Gerald Schuller	25. France Nature Environnement
11. Siegfried Buchholz	26. Conference of Presidents of the Outermost Regions
12. Bärbel Geissner	27. Bürgerinitiative Lebenswertes Enzersdorf an der Fischa
13. Dr. Jutta Leth	
14. Wolfgang Pirkhuber	
15. Reinhard Gschöpf	

1.

Name of the individual or organisation
Hallfarth, Dagmar
Capacity in which the individual/organisation is completing Questionnaire
As an individual / private person
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 effort taken should be decided according to measures in other industries and transportation. Keeping cheap international mobility is essential for global societies growing peaceful together. The development and optimization of effective technology should be invested in to reduce 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?
Countries and groups can be convinced by a very good comparable dataset distinguishing domestic, international aviation and their emissions in direct context to their business. Countries, groups and industries should be treated equally in a win-win situation also compared to measures in other industries (e.g. ship-transport, energy-production....) and the effectiveness of measures should be carefully followed up and given benefit to good developers.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?

Collecting and publishing very good trends of datasets to monitor the development of effectiveness per country, the kind of aviation, the kind of technology used (e.g. CO2-emissions, fuel-consumption per flight, fuel consumption per passenger, number of passengers per flight, distance per flight, weight per flight....).
Which options should be considered for the EU ETS for the period 2017-2020?
Creating emission certificates on the basis of the data sets for every flight and make them obligatory and visible on flight tickets. Extra fees on ineffective and non-climate friendly technology (>95% percentile CO2-emission value of all planes); investments in research projects to develop optimized and new climate friendly technology (involving industry and research centres).
Which options should be considered beyond 2020?
Extra fees on ineffective and non-climate friendly technology (> 50 percentile CO2-emission value of all planes).
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 small non-commercial aircraft operators (museums, clubs,...) with the status of public interests or demonstration status of flight technology should continue being excluded but not privileged private persons flying just for private use.
Submit any other comments you may have.
The measures taken into account for the international aviation should take into account measures in other industries. A great concept and AGREED roadmap including ALL CO2-emissions in general is still needed. There are some roadmaps but roadmaps in the member states are different and partly contradictory. Follow up is needed in answering the following: do we want huge planes or small ones and between which connections? How many restrictions for the markets are useful? Are CO2-emissions really the right criteria? What information does trending of datasets give us?

2.

Name of the individual or organisation
Erich Kohlhauser
Capacity in which the individual/organisation is completing Questionnaire
As an individual / private person
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?
Reduce air pollution and prevent climatic temperature increases.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Take necessary actions to meet targets.
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?
Improve engine efficiency and reduce output pollution.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Take old, inefficient and polluting aircraft out of service!
Which options should be considered for the EU ETS for the period 2017-2020?
Continue with improvements.
Which options should be considered beyond 2020?
See above.
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 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 - include them!

3.

Name of the individual or organisation
Dr Susanne Heger
Capacity in which the individual/organisation is completing Questionnaire
As an individual / private person
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?
International aviation should assume responsibility for the pollution it causes and the EU Commission should take care that the polluter-pays principle applies to the full extent.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
The EU Commission has (paid) experts to answer this question.
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?
This is definitely something the EU-Commission should give thoughts to. Please do your job!
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Polluter-pays principle, principle of true costs.
Which options should be considered for the EU ETS for the period 2017-2020?
The EU-ETS should apply without exemptions to all flights within, into and from the European Economic Area. No free certificates – aviation is a major polluter and does not deserve to be spared in any respect.
Which options should be considered beyond 2020?
Full implementation of a system that provides for a coverage of 100% of climate costs caused by the aviation industry.
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 simpler the system, the less polluters will be spared
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.](#)

This survey is somewhat hypocritical and pseudo-democratic. The aviation industry enjoys incredible privileges which grossly violate basic democratic principles, such as the principles of true cost, the polluter pays and fair taxation. The EU Commission, instead of making an end to these privileges, consults "the public". This is a very unfair way of handling the claims of the rich, perfectly organised and powerful aviation lobby.

Thousands of citizens have expressed their opinion on the privileges of the aviation industry through the petition "Taming Aviation" signed by 120 citizens' initiatives from 10 European countries. They have requested to apply the principles of true cost, the polluter pays and fair taxation to the aviation industry. But the Commission hardly pays any attention to it. This shows how little the Commission values the opinion of the public.

4.

Name of the individual or organisation
Helen Ampt
Capacity in which the individual/organisation is completing Questionnaire
As an individual / private person
Please give your country of residence/establishment
Italy
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?
Aviation emissions should be counted on all flights. Airlines should pay VAT on tickets and aviation fuel. Airports and airlines should not receive state aid.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
Aviation emissions should be counted on all flights. Airlines should pay VAT on tickets and aviation fuel. Airports and airlines should not receive state aid.
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 there is no GMBM for international aviation there can be no complementing. Both types of aviation should be under the same rules.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
All emissions must be counted.
Which options should be considered for the EU ETS for the period 2017-2020?
Move towards counting all emissions as quickly as possible.
Which options should be considered beyond 2020?
By 2020 everything must be in place.
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 exemptions.
Submit any other comments you may have.
Aviation emissions should be counted on all flights. Airlines should pay VAT on tickets and aviation fuel. Airports and airlines should not receive state aid.

5.

Name of the individual or organisation
Martin Ulrich Fischer
Capacity in which the individual/organisation is completing Questionnaire
As an individual / private person
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?
International aviation has to assume responsibility for the pollution caused by it; application of the polluter-pays principle to be supervised by the EU authorities.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
To be assessed by the Commission's experts - paid with our tax money.
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?
To be assessed by the Commission's experts - paid with our tax money.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Polluter pays; true cost (incl external effects etc); equal treatment
Which options should be considered for the EU ETS for the period 2017-2020?
The EU-ETS should apply without exemptions to all flights within, into and from the EEA. No free certificates, no subsidies.
Which options should be considered beyond 2020?
Implementation of a system that provides for full coverage of all climate cost caused by the aviation industry.
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.)?
Keep the system simple to avoid loopholes.
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.
<p>This, like comparable surveys is somewhat hypocritical and pseudo-democratic - instead of doing the job it is paid for the EU-Commission consults "the public". This is a very unfair way of handling the claims of the rich, perfectly organised and powerful aviation lobby.</p> <p>The aviation industry enjoys incredible privileges which grossly violate basic democratic principles as well as even the most basic competition rules, such as the principles of true cost, the polluter pays and fair taxation. Thousands of citizens have expressed their opinion on the privileges of the aviation industry through the petition "Taming Aviation" signed by 120 citizens' initiatives from 10 European countries. They have requested to apply the principles of true cost, the polluter pays and fair taxation to the aviation industry. But the Commission hardly pays any attention to it. This shows how little the Commission values the opinion of the public.</p>

6.

Name of the individual or organisation
Johanna Aschenbrenner-Faltl
Capacity in which the individual/organisation is completing Questionnaire
As an individual / private person
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 the transport sector causing the most environmentally-damaging emissions, 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 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?
Air transport should be included in the emissions trading system without exception. The emission allowances allocated in accordance with an internationally agreed distribution plan (allocation plan) are tradable. The volume of emissions allowances is calculated on the basis of caps for greenhouse gases. The caps are to be established internationally under the 2020 emissions targets and to be reduced during the subsequent years until 2050 in accordance with the climate decisions. Allowances allocated must expire in accordance with the cap reduction. A free allocation of emissions allowances is permissible only for aircraft with the lowest emission propulsion technology.
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 shift from air transport to more environment-friendly modes of transport, in which international aviation 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 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?

<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>
<p>New mechanisms introduced 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>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>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>

7.

<p>Name of the individual or organisation</p>
<p>Karl Sperker</p>
<p>Capacity in which the individual/organisation is completing Questionnaire</p>
<p>As an individual / private person</p>
<p>Please give your country of residence/establishment</p>
<p>Austria</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>As the transport sector causing the most environmentally-damaging emissions, 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 much more intensively and ambitiously. In operational measures, restrictions (operational limitations) to avoid unnecessary emissions should also not be taboo.</p>
<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p>
<p>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</p>

<p>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 shift from air transport to more environment-friendly modes of transport, which in international aviation 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>
<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>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>

8.

<p>Name of the individual or organisation</p>
<p>Grazyna König</p>
<p>Capacity in which the individual/organisation is completing Questionnaire</p>
<p>As an individual / private person</p>
<p>Please give your country of residence/establishment</p>
<p>Austria</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>

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?
After aviation, which is indeed the most damaging to the climate, it is necessary to proceed here more consistently than hitherto. 1) Make curved approach mandatory for flights over the large towns and cities. 2) Promote aircraft development technology. 3) Operating restrictions should also be made possible.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
1) Introduce a strict cap for all international aviation emissions. 2) Double counting of offsets must be strictly avoided. 3) Environmental, social aspects and also the effectiveness and sustainability of measures are to be taken into account to the maximum possible extent. 4) Free allocation of emission allowances for aviation, as well as price-curling or limiting mechanisms, must not be allowed. National subsidies or offsets for allowances must be prohibited. 5) Transparency in all respects for the public (including making questionnaires available in the respective languages)
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?
1) Internal shift from air transport to more climate-friendly transport options (rail, ships) 2) Development of own programmes in line with Paris climate objectives
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
1) To include and reduce all greenhouse gas emissions. 2) To remove surplus allowances from circulation altogether and no longer to permit them, then develop an effective price for emissions. 3) Air transport must contribute significantly to the reduction of emissions.
Which options should be considered for the EU ETS for the period 2017-2020?
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?
The cap for authorised emissions for air transport must fall very steeply in this phase. The reduction factor for the total quantity of allowances needs to be reviewed in the light of the requirements of the Paris climate targets.
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.)?
Ensure environmental effectiveness of the EU ETS, taking into account international developments.
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.

9.

Name of the individual or organisation
Elisabeth Kolb
Capacity in which the individual/organisation is completing Questionnaire

As an individual / private person
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?
As the transport sector causing the most environmentally-damaging emissions, 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 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 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 ₂ 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. '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?
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 shift from air transport to more environment-friendly modes of transport, in which international aviation 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?

<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>
<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>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>In future, all costs arising must be passed on to air passengers and the enticement of low-cost flights abolished; there is an absolute price disproportion compared to alternative modes of transport. Subsidisation of air traffic needs to be stopped.</p>

10.

<p>Name of the individual or organisation</p>
<p>Gerald Schuller</p>
<p>Capacity in which the individual/organisation is completing Questionnaire</p>
<p>As an individual / private person</p>
<p>Please give your country of residence/establishment</p>
<p>Austria</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>As the transport sector causing the most environmentally-damaging emissions, 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 much more intensively and ambitiously. In operational measures, restrictions (operational limitations) to avoid unnecessary emissions should also not be taboo.</p>
<p>Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?</p>
<p>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 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 should 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. '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?](#)

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

11.

Name of the individual or organisation
Siegfried Buchholz
Capacity in which the individual/organisation is completing Questionnaire
As an individual / private person
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 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.
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

<p>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>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>

12.

<p>Name of the individual or organisation</p>
<p>Bärbel Geissner</p>
<p>Capacity in which the individual/organisation is completing Questionnaire</p>
<p>As an individual / private person</p>
<p>Please give your country of residence/establishment</p>
<p>Germany</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>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.</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 transport should be included in the emissions trading system without exception. The emission allowances allocated in accordance with an internationally agreed distribution plan (allocation plan) are tradable. The volume of emissions allowances is calculated on the basis of caps for greenhouse gases. The caps are to be established internationally under the emissions balances 2020 and to be reduced during the subsequent years until 2050 in accordance with the climate decisions. Allowances allocated expire in accordance with the cap reduction. A free allocation of emissions allowances is permissible only for aircraft with the lowest emission</p>

propulsion technology.
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.
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.

13.

Name of the individual or organisation
Dr. Jutta Leth
Capacity in which the individual/organisation is completing Questionnaire
As an individual / private person
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?

<p>The aviation sector has to reduce its greenhouse gas emissions (CO₂, nitrogen oxides, ozone, PAH, sulphates etc./diesel combustion emissions) — the global temperature increase must remain below 2 degrees Celsius, climate-friendly propulsion procedures must be researched intensively and implemented, dynamic limits for climate-damaging exhaust gases and possibility of operating restrictions are needed.</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 transport should be included in the emissions trading system without exception, allocation plans (distribution plans) are necessary, the volume of emissions allowances is calculated on the basis of caps for greenhouse gases, these caps are to be established internationally under the emissions balances 2020 and to be reduced by 2050, in accordance with the climate decisions, allowances allocated expire in accordance with the cap reduction, free allocation of emission allowances exists only for aircraft with low emission propulsion technologies (e.g. solar).</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/groups of countries for domestic aviation must complement the GMBM in such a way that all emissions from aviation are fully covered. In addition, programmes and objectives must be developed in line with the Paris climate objectives (e.g. shift from aviation to more climate-friendly modes of transport, e.g. the railways in terms of passenger and freight for national and international short-haul routes). In any event, it must be avoided that resolutions of the ICAO Conference are introduced as mandatory through EU regulations or directives as a kind of 'back door'.</p>
<p>Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?</p>
<p>Excess allowances must be entirely and permanently withdrawn from circulation and an effective price for emissions must be developed (permanently and covering all damage arising, e.g. healthcare costs, etc.), all greenhouse gas emissions must be included, offset and reduced in the longer term. Air transport must make an essential contribution to the real emission reductions. The EU ETS must be a pioneer in developing new offsetting mechanisms (as provided for in the Paris Agreement) and immediately develop all necessary measures for efficient, high quality implementation.</p>
<p>Which options should be considered for the EU ETS for the period 2017-2020?</p>
<p>The EU ETS, as from 2017, must cover all flights within and into or out of the European Economic Area, free allocations may still be granted only in justified individual cases.</p>
<p>Which options should be considered beyond 2020?</p>
<p>The coverage 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 as much in this phase as for stationary installations. The reduction factor for the total quantity of allowances must be reviewed in the light of the requirements of the Paris climate targets and therefore also be increased beyond the 2.2% 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>
<p>According to Regulation 421/2014, the Commission proposal following the 2016 ICAO Assembly should swiftly propose measures which ensure that international developments are 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. Above all it must be ensured that international developments are taken into consideration and environmental effectiveness improved (e.g. revision of the auctioning of allowances, use of international offsets, etc. — see actions 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>Exemption of issuers should be rejected.</p>
<p>Submit any other comments you may have.</p>

The aviation sector must pay all consequential costs (climate, health, etc.) and can no longer enjoy a special status in many areas (e.g. in the field of taxes, levies, etc.).

14.

Name of the individual or organisation
Wolfgang Pirkhuber
Capacity in which the individual/organisation is completing Questionnaire
As an individual / private person
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?
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. The Europe-wide introduction of taxation of aircraft fuels (kerosene) can contribute to greater true-cost pricing of different transport systems (alternatives to air transport).
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 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. '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?
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.
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.
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?
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.)?
Alternative climate-friendly terrestrial transport systems should be given a major boost through research & development and possibly also by positive tax incentives. This is also particularly applicable for developing countries and within the framework of international economic cooperation.
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.
An EU-wide uniform kerosene tax would be an important measure in order to achieve a more level playing field between alternative means of transport and as such also suitable for gradually curbing air transport.

15.

Name of the individual or organisation
Reinhard Gschöpf
Capacity in which the individual/organisation is completing Questionnaire
As an individual / private person
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?
International aviation is the transport sector with the most climate-damaging emissions. Therefore, international aviation should make a disproportionate contribution to the reduction of greenhouse gas emissions and to achieving the climate objectives of Paris. Aircraft emit not only CO2, but also nitrogen oxides, ozone, sulphates, soot and water vapour, which also have specific, major climate change impacts in the upper layers of the atmosphere. Reduction plans for these emissions must meet the objective to limit the warming to well below two degrees centigrade. Continuing with 'business as usual with small improvements' is therefore too little. 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 more ambitiously. In operational measures, operational limitations to avoid emissions should 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 also must fall by 2050, in line with the objectives. In so far as sectors are temporarily exempt from participating in the GMBM, their emissions are also to be offset by the participants. Free allocations should consequently be prohibited. Measures for offsetting emissions may be allowed only if, technically proven, they correspond to the highest standards of efficiency and sustainability as well as environmental, social and development policy aspects. 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 fully offset independently of this. Double counting of offsets must be strictly avoided. Provision should be made for expedient, effective sanctions for infringements.
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 their 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 objectives, programmes and measures 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 the railways (rail transport), for both passengers and goods.

It is not expected that at the ICAO Conference sufficient elements for climate protection will be decided. It is therefore necessary to prevent such inadequate decisions by the ICAO Conference then 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 the credibility and effectiveness which in the meantime have been largely lost. To this end, the surplus allowances must be completely and permanently withdrawn from the market 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, without exception, all climate relevant emissions can be included, technically verifiably priced, offset and finally reduced.

Since Europe's aviation market is already (over-)developed and its greenhouse gas emissions are particularly harmful, it must pay a disproportionately large 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?](#)

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

Free allocations for aircraft operators should already in this phase be reduced to zero if the path towards reduction targets is not to be missed already from the beginning and therefore permanently!

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

In all likelihood the cover of the emissions from international aviation by the GMBM will only be very fragmentary and incomplete. The inclusion of international flights must therefore 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 more in this phase than that for stationary installations, because these aviation emissions have been proved to be more damaging. 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 certainly 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 \(e.g. review of auctioning shares, use of international offsets – including from the new mechanism established by the Paris Agreement, etc.\)?](#)

The auctioning of allowances needs to be regulated far more strictly. In general, however, additional measures, apart from the EU ETS, are necessary and inevitable if the climate-damaging emissions from aviation are to be curbed to the extent necessary to meet the Paris climate objectives.

The European Commission is urged firstly to propose appropriate regulatory measures at EU level and secondly not to hinder such measures in the Member States.

[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. And for the period up to 2021 contributions from this sector to reduce emissions must also be prompted.

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

The European Commission is urged to contribute actively to terminating existing unjustified tax benefits of air transport. The exemption from value added tax/turnover tax of airline tickets, as well as the exemption from energy tax of all aircraft fuel (going well beyond what is mandatory in the ICAO resolution!) and further inflows

of public funds (e.g. payments to airlines so that they serve certain airports) are a blatant distortion of competition in the transport sector. This distortion of competition, with the air transport sector, also favours the transport sector which is the most damaging to the climate and so is doubly problematic. The European Commission is also urged firstly to take steps itself to reduce aircraft noise in airport region and secondly not to hinder such measures in the Member States. This will require very significant tightening up of the Environmental Noise Directive and considerable attention in EIA and SEA procedures.

16.

Name of the individual or organisation
Arab Air Carriers Organization
Capacity in which the individual/organisation is completing Questionnaire
International organisation
Please give your country of residence/establishment
Lebanon
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 should have a unified measure in place to tackle aviation's emissions without hampering the growth of the aviation industry. This unified measure or agreement should tackle all aspects of the aviation industry such as technologies, operational improvements and infrastructure developments in addition to a cost effective measure that takes into account special circumstances and respective capabilities of states.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
States should have a clear understanding, agreement, and commitment to the structure and design elements of the proposed GMBM: - The target needs to be agreed upon recognizing the different capabilities and aviation maturity of states. - States should recognize the fact that by 2020 we might not have a 100% coverage of the international aviation emissions which can be achieved at a later stage. - Differentiation element based on a GNI metric is not an acceptable criteria. - Differentiation element which recognizes the fact that full CNG will be achieved starting 2026 - Clear unified simple MRV , as well as a clear unified guidance on the implementation of the scheme - Openness of Carbon Markets which allow States to purchase their offset obligation without incurring additional cost due to monopoly in markets - The need to apply exemption for developing states - removal of taxes and individual schemes introduced prior to the application of the GMBM
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?
it will add burdens on the aircraft operators for the following reasons: - double counting of emissions: flights under a measure taken by group of countries which can be identified as domestic or intra, will be considered under the GMBM as international aviation. ex: flights between CDG/ROM under the EU ETS is intra EU flights while under ICAO GMBM its international aviation. - If applied, airlines will have to report twice, offset differently, trade differently since emission units, criteria and markets are not the same. - Administratively complex since airlines need to report to both schemes with a different reporting and verification criteria as well as different baselines.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
EU ETS should be reviewed to: - Amend the baseline from 2005 to 2020 levels - Apply same MRV as the GMBM - Restructure the EU ETS to be a tool to implement the GMBM - Withdrawal of the EUAA and replacing that by the GMBM EU criteria - EU ETS should be an offsetting scheme rather than a trading scheme - Deletion of the article of the EU ETS related applicability on 3rd countries
Which options should be considered for the EU ETS for the period 2017-2020?
- ONLY MRV to be done by a similar criteria of the GMBM and should be simple. - Airlines already are applying individual measures and initiatives to cut down their emissions prior to 2020 and that is reflected in the industry achieving its 1.5 % target. - So that period should be left for capacity building, training - States to put in

place the right measures to implement the GMBM
Which options should be considered beyond 2020?
- removal of taxes introduced prior to 2020 in the EU - removal of the EED which duplicates the current measures - removal of the intra EU ETS or amending it to replicate the 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.)?
No comment since the EU ETS is a measure that is supposed to be replaced by the GMBM in as far as international aviation is concerned.
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?
Same exemption as the GMBM should apply with same levels

17.

Name of the individual or organisation
MHS Aviation GmbH
Capacity in which the individual/organisation is completing Questionnaire
Professional organisation
Please indicate the sectors your organisation represents
Commercial Aircraft Operator
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?
Simplified duty for all non-sustainable Carbon products
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Stopping the EU ETS and introducing a CO2 tax
Which options should be considered for the EU ETS for the period 2017-2020?
Keeping the EUA on a low price
Which options should be considered beyond 2020?
Exemption of all Operators emitting less than 30 000t CO2
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.)?
Additional EUA free of Charge for emerging operators
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, no alternative measures should be considered cause of too much red tape

18.

Name of the individual or organisation
J.W. Pulles
Capacity in which the individual/organisation is completing Questionnaire
Private enterprise
Business Sector
Consultancy for environmental issues related to aviation
If private enterprise
Yes - micro enterprise
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?
ICAO considers a basket of measures consisting of: technical improvements (no action by governments needed as it is driven by economy), improvements in ATC (just facilitating and take out the no fly zones), market based measures and alternative fuels. MBM's have the best perspectives, alternative fuels have to be verified on the carbon foot print. The EU should focus in September in getting a global agreement, fine tuning and tighten the constraints is something that can be achieved over time once the basic decision is made. Don't shoot for something perfect, but get something in place.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
At the moment several options are under discussion within ICAO. Europe should accept the sectoral approach even though the individual approach gives lower costs for the EU airlines, but this alternative would be unacceptable for countries like China. The sectoral approach has the advantage that no exemptions for fast growers new entrants and early movers are necessary. These exemptions will distort the competition between airlines. Only exemptions for Low Emitting States are acceptable. With the present proposals the impact of aviation is only fractional addressed. Over time one could tighten the reductions to be made.
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 best way would be to include the emissions from domestic traffic in the global system. It increases the transparency, makes the system simple and reduces the chances on distortions of competition between airlines. However this seems now politically difficult to achieve. Therefore one could consider those emissions like in the Kyoto protocol part of the national emissions and by that part of the national reduction targets. Unfortunately this will result in very different actions and different costs to airlines in various parts of the world
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
Europe has a choice for the emissions of the intra-EU traffic. It could maintain the present situation where the intra EU traffic is obliged to follow the rules of the directive. This means that two different set of rules would apply for the EU airlines. The flights outside the EU have to follow the ICAO system (sectoral approach base year 2020) and for the flights within the EU the EU-ETS (base year is 2004-2006 and it is based on the individual approach, auctioning etc.) If one would like to follow this approach this should be communicated at the 2016 ICAO Assembly. The other possibility is that all the international flight of the intra EU traffic are part of the ICAO system. That means that the domestic flights within the EU are not covered. It remains to be seen if it is worthwhile to use the EU-ETS for these fights given the administrative burden and the small amounts of emissions That are covered.
Which options should be considered for the EU ETS for the period 2017-2020?
Continue with the EU_ETS for the intra EU traffic. Even if no agreement is reached at the 2016 Assembly this is the only way forward. The EU has no means to enforce another option for the fights to and from countries outside the EU.
Which options should be considered beyond 2020?
Seek to tighten the constraints for the ICAO system, Look for alternative fuels such as the biofuel from algae

and such. Taking in account the carbon foot print.
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.)?
Skip the auctioning, it is only a method to create revenues for governments and it creates another layer of administrative complexity. International offsets should be reviewed on their credibility and should not be part of the so-called hot air.
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 yes, but one could assign them a forfaitair unit for which they should buy permits. If they consider that unfair they could choose to follow the emission trading scheme alike the other airlines with all the administrative burden going with it.

19.

Name of the individual or organisation
Braunegg Lufttaxi GmbH.
Capacity in which the individual/organisation is completing Questionnaire
Private enterprise
Business Sector
Air Taxi
If private enterprise
Yes - small enterprise
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 goal should be achieved by equal treatment of all participants whereby the cheapest and least burden way should be chosen. The targets can only achieved if air traffic is reduced. Other sources, like improvement of engines are not feasible. The reduction of traffic can be reached by taxes, reduction of registration of a/c, reduction of flights by restrictive regulations. Through this intervention the free marked will be disturbed. The question is, if through this actions the economy will be damaged more, than emissions reduced. The consideration is, that we reduce emissions most effective, if we stop air traffic. In this case we reduce economy, which nobody wants. The most effective way is to interfere as far as necessary and as cheap as possible.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
A system which fulfils the requirement of equal treatment and cheap implementation, is payment of each passenger dependent from duration of flight and use of most effective a/c with respect to emissions. The payments have to be supervised by an international organisation.
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?
Air traffic is so global that a national solution, which stands alone, is not feasible.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO Assembly?
A global approach in the above mentioned sense.

Which options should be considered for the EU ETS for the period 2017-2020?
Without ICAO consent the EU ETS system will have the effect that only European Airlines will have the disadvantage of the system and non EU carriers will have the revenue.
Which options should be considered beyond 2020?
If no global solution can be achieved, there are no national solutions possible.
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.)?
My opinion is that the EU ETS system is complicated, expensive and until now not effective.
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?
Since the payments should be based on passengers and effective equipment all operators of small aircraft should be exempted, because costs of the system are in no relation to the payment by the operators.

20.

Name of the individual or organisation
Good Energy
Capacity in which the individual/organisation is completing Questionnaire
Professional organisation
Please indicate the sectors your organisation represents
Power & gas
If your organisation is registered in the Transparency Register, please give your Registry ID number
Don't know
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 international aviation sector has avoided its obligations, in the wider context of emissions reductions, for far too long. Efficiency claims made by the sector, whilst laudable, have been driven by economic expediency rather than any environmental necessity, which other large emitting sectors have had to face. Therefore the time has come for aviation companies to have explicit reduction targets which are in line with nation's INDCs. Preferably there should be a sector target to meet with ICAO determining the burden share amongst its members, rather like the EU did. Carbon leakage needs to be avoided, in that if there are nation specific targets, better treated nations should not be able to offer 'flags of convenience' to airlines from less well treated countries. Or ICAO should simply have the burden fall on the companies according to historic baselines, regardless of their location.
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?
A proper methodology with absolute cuts rather than efficiency promises.
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 ICAO handle the burden sharing amongst members, it will be a simple matter of crediting the reductions from the airline according to its domicile. If they seek to allocate the reductions by nation, this will be more difficult to work out an allocation mechanism
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO

Assembly?
To avoid over allocation, free allowances and carbon leakage payments.
Which options should be considered for the EU ETS for the period 2017-2020?
The EU should re-introduce its previously mothballed scheme covering the aviation sector for all flights within Europe. It should implement similar measures for the marine sector
Which options should be considered beyond 2020?
The same - unless there is a global scheme for the aviation sector in place by then
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 thus far employed in the EU ETS should be employed, with the exception of free allowances and carbon leakage payments. International offsets have a role , and the EU can define which they find acceptable. The sector should be able to use EUAs, but all other covered sectors not use EUAs. However scheme design and specific instruments needs to be subjected to some rigorous analysis and scenario testing
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 - aviation fuel tax
Submit any other comments you may have.
At present it's absurdly cheap for people to fly. The environmental cost of their actions has to be reflected through a stringent emissions reductions scheme. There are however some important safety issues to be taken into account in scheme design to avoid, for example, planes flying with minimum fuel loads. i.e. low cost operators must not be allowed to cut safety corners in meeting the requirements of an emissions reductions scheme for aviation

21.

Name of the individual or organisation
Werkgroep Toekomst Luchtvaart
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus:
Sustainable aviation in the Netherlands and the EU
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?
<ul style="list-style-type: none"> • Aviation reductions should be driven by efforts at ICAO level as well as EU level. ICAO and EU policies should: <ul style="list-style-type: none"> o Cover all aviation emissions, not just those above 2020 levels o Promote in-sector reductions, i.e. by incentivising technology and performance improvements as well as demand management o Routes between developed countries should be subject to more ambitious climate policies o Ambition of all measures should increase over time in line with the 1.5° goal agreed in Paris • Aviation will continue to drive climate change so must contribute to climate finance • EU policies should reject the use of international credits as reductions achieved should be domestic • ICAO policies should not in any way limit the use of more ambitious policies by states and regions • If ICAO resorts to international credits, it should only allow those which comply with strict criteria in

line with the SDGs the commitment to no double-counting as agreed in Paris
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"> • Sufficient political support from states and sufficient detail to provide confidence that an effective GMBM, with a binding goal of Carbon Neutral Growth 2020 (CNG2020), will come into operation from 2021 • Strict, mandatory criteria for emission units with a commitment to common social and environmental standards. Exclusion of all credits that are listed as lacking environmental integrity • Recognition that CNG2020 is an insufficient contribution to the Paris Agreement objectives and the GMBM and other measures must be increased substantially over time • No provisions which prohibit greater ambition by states, while encouraging states to be more ambitious • Proper accounting and MRV rules for alternative fuels and offset credits to avoid double counting • Early MRV start, interlinkage with UNFCCC accounting for 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?
<ul style="list-style-type: none"> • GMBM should be seen as floor for ambition, not a ceiling. States as a group or on a bilateral basis should be able and encouraged to use the GMBM mechanism to increase ambition through, for example, discounting • A single global MRV would provide additional administrative simplicity for operators. However it will only serve this role if the quality of the MRV is high: otherwise states will depart from it in order to ensure environmental integrity. The ICAO MRV should therefore be of the highest environmental integrity. Registries should be coupled to those under the UNFCCC to ensure avoidance of 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) • Additional policies should be considered, as appropriate, e.g. 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?
<ul style="list-style-type: none"> • Combined ICAO and EU action should ensure a fair contribution to the 1.5° limit and aim to cover all aviation emissions to and from Europe • With regard to emissions from international flights departing and arriving in the EU, the Directive stipulates that these should be fully covered from 2017 onwards. Depending on the outcome of the 2019 ICAO Assembly, the exact share of emissions needing coverage by the EU ETS can be reviewed at that time • Estimating the gap in ambition between the EU 2030 objective and the ICAO target, incl whether the ICAO target will be increased prior to 2030 • Estimating the gap in environmental integrity between EU ETS allowances and international credits permitted under the GMBM. The EU should ensure a level playing field between transport modes in the single market (i.e. exclude use of international credits) • The strength of the EU ETS should reflect the above mentioned gaps
Which options should be considered for the EU ETS for the period 2017-2020?
<ul style="list-style-type: none"> • Reg 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, or other equivalent measures, during this period this provision should remain untouched
Which options should be considered beyond 2020?
<p>ICAO, or other countries, implement</p> <ul style="list-style-type: none"> • The EU must step forward with greater ambition than CNG2020. ETS, as a proven method of reducing emissions, must be retained for intra-EU routes. This avoids undermining EU 2030 objectives and avoids market distortions between transport modes. It must be reformed and include full auctioning, be subject to the linear reduction factor and address non-CO2 effects • The EU ETS should also cover all emission of inbound and outbound flights that are not covered by the GMBM to ensure ambition required by the Paris Agreement is met • International allowances and offsets should not be permitted for compliance with EU ETS • Appropriate measures should be put in place to avoid double-counting
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.)?
MRV scheme as a level of integrity equal to that for EU ETS. The EU should push for an approach based on the EU ETS <ul style="list-style-type: none"> • Free allowances are no longer required within the EU aviation ETS. Furthermore, the aviation cap should be reduced in order to be in line with the ambition set by the Paris Agreement • 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 EU ETS should start operating again in 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?
<ul style="list-style-type: none"> • 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.
<ul style="list-style-type: none"> • ICAO's lack of transparency breaches the Aarhus convention • The recently agreed ICAO CO2 standard fails to reduce emissions from the sector • EU should provide complementary measures such as fuel taxation, VAT, improved efficiency standards • The EU should not entirely outsource its climate policy to ICAO - action at EU level also required • Reduction efforts should include non-CO2 emissions as they contribute significantly to climate change

22.

Name of the individual or organisation
VCS - Verkhersclub der Schweiz ATE – Association Transport et Environnement Suisse ATA – Associazione Traffico e Ambiente (Member of T&E – Transport & Environnement)
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please give your country of residence/establishment
Switzerland
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"> • Aviation reductions should be driven by efforts at ICAO level as well as EU level. ICAO and EU policies should: <ul style="list-style-type: none"> o Cover all aviation emissions, not just those above 2020 levels o Promote in-sector reductions, i.e. by incentivising technology and performance improvements as well as demand management o Routes between developed countries should be subject to more ambitious climate policies o Ambition of all measures should increase over time in line with the 1.5° goal agreed in Paris • Aviation will continue to drive climate change so must contribute to climate finance • EU policies should reject the use of international credits as reductions achieved should be domestic • ICAO policies should not in any way limit the use of more ambitious policies by states and regions • If ICAO resorts to international credits, it should only allow those which comply with strict criteria in line with the SDGs the commitment to no double-counting as agreed in Paris
Which elements should emerge from the 2016 ICAO Assembly to provide for the implementation of a robust GMBM by 2020?

- Sufficient political support from states and sufficient detail to provide confidence that an effective GMBM, with a binding goal of Carbon Neutral Growth 2020 (CNG2020), will come into operation from 2021
- Strict, mandatory criteria for emission units with a commitment to common social and environmental standards. Exclusion of all credits that are listed as lacking environmental integrity
- Recognition that CNG2020 is an insufficient contribution to the Paris Agreement objectives and the GMBM and other measures must be increased substantially over time
- No provisions which prohibit greater ambition by states, while encouraging states to be more ambitious
- Proper accounting and MRV rules for alternative fuels and offset credits to avoid double counting
- Early MRV start, interlinkage with UNFCCC accounting for 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?

- GMBM should be seen as floor for ambition, not a ceiling. States as a group or on a bilateral basis should be able and encouraged to use the GMBM mechanism to increase ambition through, for example, discounting
- A single global MRV would provide additional administrative simplicity for operators. However it will only serve this role if the quality of the MRV is high: otherwise states will depart from it in order to ensure environmental integrity. The ICAO MRV should therefore be of the highest environmental integrity. Registries should be coupled to those under the UNFCCC to ensure avoidance of 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)
- Additional policies should be considered, as appropriate, e.g. 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 and EU action should ensure a fair contribution to the 1.5° limit and aim to cover all aviation emissions to and from Europe
- With regard to emissions from international flights departing and arriving in the EU, the Directive stipulates that these should be fully covered from 2017 onwards. Depending on the outcome of the 2019 ICAO Assembly, the exact share of emissions needing coverage by the EU ETS can be reviewed at that time
- Estimating the gap in ambition between the EU 2030 objective and the ICAO target, incl whether the ICAO target will be increased prior to 2030
- Estimating the gap in environmental integrity between EU ETS allowances and international credits permitted under the GMBM. The EU should ensure a level playing field between transport modes in the single market (i.e. exclude use of international credits)
- The strength of the EU ETS should reflect the above mentioned gaps

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 from or to the EU. In the absence of other emissions trading systems for international aviation, or other equivalent measures, during this period this provision should remain untouched

Which options should be considered beyond 2020?

- The scope covered by the EU ETS should depend on the ambition of the GMBM as well as measures implemented by other countries. The exact share of a flight's emissions covered by the EU ETS can thus be reviewed in light of what ICAO, or other countries, implement
- The EU must step forward with greater ambition than CNG2020. ETS, as a proven method of reducing emissions, must be retained for intra-EU routes. This avoids undermining EU 2030 objectives and avoids market distortions between transport modes. It must be reformed and include full auctioning, be subject to the linear reduction factor and address non-CO2 effects
- The EU ETS should also cover all emission of inbound and outbound flights that are not covered by the GMBM to ensure ambition required by the Paris Agreement is met
- International allowances and offsets should not be permitted for compliance with EU ETS
- Appropriate measures should be put in place to avoid double-counting

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.)?
<ul style="list-style-type: none"> • The EU ETS should exclude international offsets in order to avoid market distortions • The EU should aim to take part in a single MRV scheme proposed by ICAO provided that MRV scheme as a level of integrity equal to that for EU ETS. The EU should push for an approach based on the EU ETS • Free allowances are no longer required within the EU aviation ETS. Furthermore, the aviation cap should be reduced in order to be in line with the ambition set by the Paris Agreement • 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 EU ETS should start operating again in 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?
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.
<ul style="list-style-type: none"> • ICAO's lack of transparency breaches the Aarhus convention • The recently agreed ICAO CO2 standard fails to reduce emissions from the sector • EU should provide complementary measures such as fuel taxation, VAT, improved efficiency standards • The EU should not entirely outsource its climate policy to ICAO - action at EU level also required • Reduction efforts should include non-CO2 emissions as they contribute significantly to climate change

23.

Name of the individual or organisation
Asociación Compañías Españolas de Transporte Aéreo (ACETA)
Capacity in which the individual/organisation is completing Questionnaire
Professional organisation
Please indicate the sectors your organisation represents
Our organisation represents to the Spanish Airlines and includes Iberia, Air Europa, Vueling, Iberia Express, Air Nostrum, Gestair, Evelop, Binter, Canair and Naysa.
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 from international aviation and how should this develop over time?
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?
The main design elements of a GMBM should be agreed, or a roadmap defined in to finalise agreement in the near future, at the ICAO 2016 Assembly. Key elements include any route-based differentiation between States 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?
The GMBM should be flexible enough to enable its application to domestic emissions should a State or group of States wish to voluntarily apply the measure here.
Which should be the main principles and criteria guiding a review of the EU ETS following the 2016 ICAO

Assembly?

The EU ETS review should take into account the global political will toward making progress on a global solution, assessing the extent to which there is positive engagement from States in the development of a GMBM through ICAO. Agreement of some of the key elements, or a firm roadmap to their agreement, at the ICAO 2016 Assembly would demonstrate significant progress towards a GMBM. Avoidance of competitive distortion and avoidance of international political discord are key principles.

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

EU ETS for aviation should be unchanged for this period while a GMBM is being finalised, with the scope set to intra-European flights.

Which options should be considered beyond 2020?

On successful implementation of the GMBM, the EU ETS should be removed for aviation. This will avoid double regulation of the same emissions. The GMBM would cover both domestic and international flights in the EU, as well as the majority of intercontinental flights departing and arriving the EU.

Name of the individual or organisation
Comitato Fuori PISTA
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus:
Environment protection and acoustic emissions in aviation caused by Rome Fiumicino (FCO) airport
Please give your country of residence/establishment
Italy
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?
Amongst all means of transportation, international aviation is the number one emitter of climate-damaging gases and thus must contribute to reduce emissions responsible for climate change. Besides CO ₂ , nitrogen oxides, ozone, sulfates, black carbon and water vapor are emitted by aircrafts in high altitudes leading to specific climate impacts. Concepts to reduce these emissions must focus on restricting the increase in temperature considerably below two degrees Celsius. Measures taken so far (development of alternative engine concepts, operational measures, challenging dynamic limits for climate-wrecking jet engine fumes) must be pursued more intensively and ambitiously. Operational restrictions to avoid unnecessary emissions must not be out of limits.
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.

25.

Name of the individual or organisation
France Nature Environnement (FNE)
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus: sectors your organisation represent
France Nature Environnement. All skills about Environment : biodiversity; global warming, air pollution, biofuels in ILUC, TAFTA, etc. 3500 associations federated and 850 000 members.
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?
Aviation reductions should be driven by efforts at ICAO level as well as EU level. ICAO and EU policies should: <ul style="list-style-type: none"> - Cover all aviation emissions, not just those above 2020 levels - Promote in-sector reductions, i.e. by incentivising technology and performance improvements as well as demand management - Routes between developed countries should be subject to more ambitious climate policies - Ambition of all measures should increase over time in line with the 1.5^o goal agreed in Paris - Aviation will continue to drive climate change so must contribute to climate finance - EU policies should reject the use of international credits as reductions achieved should be domestic - ICAO policies should not in any way limit the use of more ambitious policies by states and regions - If ICAO resorts to international credits, it should only allow those which comply with strict criteria in line with the SDGs the commitment to no double-counting as agreed in Paris
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"> - Sufficient political support from states and sufficient detail to provide confidence that an effective GMBM, with a binding goal of Carbon Neutral Growth 2020 (CNG2020), will come into operation from 2021 - Strict, mandatory criteria for emission units with a commitment to common social and environmental standards. Exclusion of all credits that are listed as lacking environmental integrity - Recognition that CNG2020 is an insufficient contribution to the Paris Agreement objectives and the GMBM and other measures must be increased substantially over time - No provisions which prohibit greater ambition by states, while encouraging states to be more ambitious - Proper accounting and MRV rules for alternative fuels and offset credits to avoid double counting - Early MRV start, interlinkage with UNFCCC accounting for 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?

- GMBM should be seen as floor for ambition, not a ceiling. States as a group or on a bilateral basis should be able and encouraged to use the GMBM mechanism to increase ambition through, for example, discounting
- A single global MRV would provide additional administrative simplicity for operators. However it will only serve this role if the quality of the MRV is high: otherwise states will depart from it in order to ensure environmental integrity. The ICAO MRV should therefore be of the highest environmental integrity. Registries should be coupled to those under the UNFCCC to ensure avoidance of 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)
- Additional policies should be considered, as appropriate, e.g. 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 and EU action should ensure a fair contribution to the 1.5° limit and aim to cover all aviation emissions to and from Europe
- With regard to emissions from international flights departing and arriving in the EU, the Directive stipulates that these should be fully covered from 2017 onwards. Depending on the outcome of the 2019 ICAO Assembly, the exact share of emissions needing coverage by the EU ETS can be reviewed at that time
- Estimating the gap in ambition between the EU 2030 objective and the ICAO target, incl whether the ICAO target will be increased prior to 2030
- Estimating the gap in environmental integrity between EU ETS allowances and international credits permitted under the GMBM. The EU should ensure a level playing field between transport modes in the single market (i.e. exclude use of international credits)
- The strength of the EU ETS should reflect the above mentioned gaps

[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 from or to the EU. In the absence of other emissions trading systems for international aviation, or other equivalent measures, during this period this provision should remain untouched

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

- The scope covered by the EU ETS should depend on the ambition of the GMBM as well as measures implemented by other countries. The exact share of a flight's emissions covered by the EU ETS can thus be reviewed in light of what ICAO, or other countries, implement
- The EU must step forward with greater ambition than CNG2020. ETS, as a proven method of reducing emissions, must be retained for intra-EU routes. This avoids undermining EU 2030 objectives and avoids market distortions between transport modes. It must be reformed and include full auctioning, be subject to the linear reduction factor and address non-CO2 effects
- The EU ETS should also cover all emission of inbound and outbound flights that are not covered by the GMBM to ensure ambition required by the Paris Agreement is met International allowances and offsets should not be permitted for compliance with EU ETS
- Appropriate measures should be put in place to avoid double-counting

[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 to take part in a single MRV scheme proposed by ICAO provided that MRV scheme as a level of integrity equal to that for EU ETS. The EU should push for an approach based on the EU ETS
- Free allowances are no longer required within the EU aviation ETS. Furthermore, the aviation cap should be reduced in order to be in line with the ambition set by the Paris Agreement
- 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 EU ETS should start operating again in 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?
- 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's lack of transparency breaches the Aarhus convention - The recently agreed ICAO CO2 standard fails to reduce emissions from the sector - EU should provide complementary measures such as fuel taxation, VAT, improved efficiency standards - The EU should not entirely outsource its climate policy to ICAO - action at EU level also required Reduction efforts should include non-CO2 emissions as they contribute significantly to climate change

26.

Name of the individual or organisation
Conference of Presidents of the Outermost Regions
Capacity in which the individual/organisation is completing Questionnaire
The organisation of political and technical cooperation of the outermost regions
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
Which options should be considered for the EU ETS for the period 2017-2020?
The European regulations have established a system of exchange for greenhouse gas emissions quotas for the period 2013-2016. To take account of the permanent and structural dependence of outermost regions on the aviation sector, the emissions from flights between an aerodrome situated in an outermost region and an aerodrome situated in another region of the European Economic Area are exempted from the system until 31 December 2016. This derogation reflects the absence of alternatives and therefore the extreme dependence of outermost regions on air transport. Also, for the period 2017-2020, the Conference of Presidents of the Outermost Regions pleads for the extension of this derogation in order to guarantee an accessible air service, at competitive prices.
Which options should be considered beyond 2020?
With the perspective of the implementation of an international agreement establishing a global market mechanism for international aviation emissions from 2020, the Conference of Presidents of the Outermost Regions asks the European Commission to continue to fully taking the situation of outermost regions into account in accordance with its previous positions and its strategy in favour of outermost regions, of which the first limb is the reduction of their deficits in terms of accessibility. Maintaining the derogation of outermost regions is indispensable considering the economic and strategic issues facing the aviation sector of the outermost regions for which tourist revenues constitute an important part of their Gross Domestic Product. It also involves limiting the serious consequences of this system on the freedom of travel and the equal treatment of the residents of outermost regions.

27.

Name of the individual or organisation
BILEF Bürgerinitiative Lebenswertes Enzersdorf an der Fischa
Capacity in which the individual/organisation is completing Questionnaire
Civil society organisation
Please indicate your main area of focus
Saving the environment and health of people
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?](#)

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?](#)

Air transport should be included in the emissions trading system without exception. The emission allowances allocated in accordance with an internationally agreed distribution plan (allocation plan) are tradable. The volume of emissions allowances is calculated on the basis of caps for greenhouse gases. The caps are to be established internationally under the emissions balances 2020 and to be reduced during the subsequent years until 2050 in accordance with the climate decisions. Allowances allocated expire in accordance with the cap reduction. A free allocation of emissions allowances is permissible only for aircraft with the lowest emission propulsion technology.

[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.

[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.