

## **ICAO Global MBM Process**

### **European NGO Comments**

The lack of substantive discussion at ICAO's June Council meeting to move the issues forward is regrettable. There had been every expectation that this meeting was of critical importance to narrow differences given that the HGCC largely failed in its mission to provide a consensus view on the policy guidance questions the Council had referred to it last November. In its bilateral discussions this summer and at the reconvening of Council on September 4<sup>th</sup>, Europe needs to maintain pressure for an ambitious and meaningful outcome ie a decision at the 2013 Assembly to agree to implement a global MBM with a timely plan to do so (see below).

NGOs are dismayed that ICAO States have not shown more ambition towards a global MBM, with the most progressive text that governments have put on the table talking only of a roadmap towards implementation in 2016. NGO's press Europe to call for an in-principle decision at the 38<sup>th</sup> Assembly to adopt a global MBM for implementation by 2016 at the latest. This is the absolute minimum that needs to flow from this Assembly to avoid discussions stalling again, perhaps indefinitely.

Such timing is sadly lacking from the Council President's draft, despite the added stimulus of industry and NGOs calling for a decision this year. Having raised expectations with the Secretary-General's call for agreement by the end of 2012 on a global measure, and the Council's formation of the Expert and High Level Groups last year with this explicit objective in mind, an Assembly decision to defer the issue for another 3 years with no assured outcome would rightly be seen by many, including the European Parliament, as an abrogation of ICAO responsibility.

The EU should strongly reject such an outcome which would leave Europe with little option but to revert to its original policy of early action.

Any decision this year to develop details of a global MBM needs to be accompanied by a transparent, participatory, and clearly defined process on the technical aspects, on the environmental benefits including quality criteria for emission reduction units, and on economic impacts and modalities of the three options. This 2013/2014 work should culminate in recommendations for a decision on the global MBM design at an extraordinary Assembly session in 2015.

Many details remain to be addressed whatever the Assembly decision this year and it is regrettable that momentum has been lost. Of particular concern to NGOs is the question of access to offsets. There are fundamental questions of offset quality and quantity which have yet to be addressed by ICAO. Low quality offsets actually increase global emissions. Discussions currently underway in the UNFCCC on the role that offsets will play in a future climate will also have a bearing.

**As regards SCRC, NGOs could support**

De minimis exemptions from the MBM of a particular route or a particular market serving a developing country on the basis of low levels of activity, while ensuring that greater than [95%] of international aviation emissions are covered;

b) Adjustments to MBM requirements for select routes to developing countries on the basis of fast growth;

c) Adjustments to MBM requirements for aircraft operators on the basis of early action to improve fuel efficiency or reduce international aviation emissions;

d) Provisions for new entrants from developing countries;

e) Use of financing generated through implementation of the MBM;

and

f) Other appropriate route-based approaches;

To the extent that an MBM generates revenues, they could be used to alleviate the environmental impact of aircraft CO<sub>2</sub> emissions including mitigation and adaptation, to provide assistance to and support for developing States and to channel finance through existing multilateral institutions for mitigation and adaptation in developing countries.

**As regards the Framework,**

NGOs firmly support geographical scope on the basis of departing flights.

An alternative with equal environmental impact that may well be more politically acceptable would be the 50% of departing/50% of arriving flights option.

NGOs do not consider the airspace or FIR approach to be environmentally or politically acceptable and the EU should continue to oppose this option at ICAO.

Aviation Environment Federation  
Carbon Market Watch  
Friends of the Earth Germany  
RAC-France.  
Transport and Environment  
Verkehrsclub Deutschland e.V.  
WWF European Policy Office

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