

To: [Environment/Climate Minister responsible for UNFCCC]

Cc: [Transport/Aviation Minister responsible for ICAO MBM]

Dear [Minister],

In a spirit of international collaboration, last December's Paris climate Agreement set a new global ambition to aim to limit global warming to 1.5°C above pre-industrial levels. The next global moment to act on climate change will be this October, when the UN International Civil Aviation Organization (ICAO) will decide at its Assembly<sup>1</sup> on proposals for a global market-based measure (GMBM) to address carbon emissions from international flights. We urge you to continue to actively promote strong international ambition on tackling climate change in the lead up this meeting.

International aviation is a significant contributor to greenhouse gas emissions; emitting more than the 129 lowest emitting countries combined. If its emissions continue to grow as other sectors decarbonise, it will breach our global carbon budget in 2050, undermining the good work achieved in Paris. The ICAO decision this October is our best opportunity to cap this growth in net terms, and to agree a ratcheting clause to increase ambition over time, to bring aviation in line with the rest of the world's efforts. ICAO has taken almost 20 years to get to this point and we cannot afford any further delay.

As the Assembly draws nearer, we would like to ask you personally to take an active role in this process to ensure good engagement by both transport and environment ministries at the national level. Internationally, we would encourage you to send a delegation of officials from your ministry to the next key event in the MBM calendar: the Global Aviation Dialogue<sup>2</sup> in [insert country] on [insert date]. These meetings provide a clear opportunity to engage with other countries to ensure a successful outcome on the GMBM.

We are keen that the GMBM make a strong and equitable contribution towards the global climate effort, specifically, that:

- The obligation to reduce emissions is shared out fairly between different countries in view of common but differentiated responsibilities (CBDR) and special circumstances and respective capabilities (SCRC).
- There is a mandate to ratchet the ambition over time, from the current goal of carbon neutral growth from 2020 to a goal consistent with a fair share towards the Paris Agreement's 1.5°C goal
- Only high quality credits are eligible for use in the GMBM that achieve real, additional, permanent and verified emissions reductions, and do no environmental or social harm.
- A robust MVR system is agreed with clear provisions to avoid double counting of emissions reductions, as required by the Paris Agreement
- Only sustainable biofuels are supported that promote sustainable development and achieve real emissions reductions, fully accounting for lifecycle emissions and emissions from direct and indirect land use change.

For a fuller account of essential environmental criteria, please see the "ICSA Litmus Test" that follows this letter.

We hope that you will engage in the process to ensure a successful outcome in the ICAO Assembly, and we very much hope to be able to work closely with your department in [insert country] and beyond to Montreal. We would of course be very happy to meet with you to discuss these issues in more detail.

Yours sincerely,

National NGOs  
ICSA members

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<sup>1</sup> The ICAO Assembly will take place in Montreal from 27 September to 7 October. For more information, see: <http://www.icao.int/Meetings/a39/Pages/default.aspx>

<sup>2</sup> The GLADs are a platform for States and stakeholders to give feedback to ICAO on its MBM proposals. For more information, see: <http://www.icao.int/Meetings/GLADs-2016/Pages/default.aspx>

## The Litmus Test: An On-Time Departure for ICAO's Global Market-Based Measure

The International Coalition for Sustainable Aviation (ICSA) calls upon the International Civil Aviation Organization (ICAO) and its Member States to deliver on their leadership commitment to finalize a global market-based measure (MBM) to cap international aviation's net carbon pollution at no more than 2020 levels, and adopt the MBM at ICAO's 2016 Assembly. The litmus test for ICAO's leadership is an on-time launch for the global MBM, together with an open process to establish a "review and ratchet" mechanism to cut emissions below 2020 levels.

- Serious climate impacts—e.g. droughts, floods, and heatwaves—are already being experienced around the world.
- Aviation is a top-ten global climate polluter, and its pollution is forecast to triple by 2050.
- Aviation itself is at high risk from climate change, as many of the world's airports are located in low-lying coastal areas subject to sea level rise, and flights risk disruption from extreme weather.
- More than 50 jurisdictions around the world have or are starting carbon markets. Several are beginning to extend their emissions caps to aviation. ICAO must move swiftly to ensure an on-time departure for a single global market-based measure for international aviation, which is the preferred choice of industry.

ICSA, therefore, calls on ICAO and its Member States to adopt, at the 2016 Assembly, a global MBM that:

1. Initially caps the net total carbon emissions of international civil aviation at 2020 levels.
2. Effectively solves the question of how to differentiate among varied airlines and destinations.
  - ICSA proposes a simple route-based approach: Regional routes with already-heavy carbon pollution would shoulder greater initial responsibility; obligations of small, fast-growing regional routes would increase as their pollution grows; and responsibilities would be updated regularly.
3. Allows only emissions units that deliver real, additional, verifiable, permanent emissions reductions and sustainable development co-benefits.
  - Offset credits coming from questionable sources such as HFC-23, adipic acid, carbon capture and storage, large hydro, nuclear and fossil fuel projects have low environmental quality and must be excluded.
4. Avoids double counting/double-claiming of emissions units within the MBM and by other mitigation systems.
5. Ensures that if any exemptions are allowed, the integrity of the emissions cap is maintained through compensations elsewhere in the MBM policy.
6. Ensures no cap-busting price ceilings: the environmental goal must remain.
7. Builds on a solid foundation of transparency through:
  - Simple, accurate flight-by-flight emissions monitoring, reporting and verification (MRV); transparency of compliance with reasonable safeguards for commercial confidentiality, broad geographic availability of emissions units, and clear registry and tracking of transactions.
  - Robust lifecycle emissions accounting of all alternative fuels, whether they result in emissions savings or increases relative to conventional fuel. The MBM should only "credit" biofuels that reduce net lifecycle emissions beyond set thresholds and that meet environmental, social and economic sustainability criteria, including low indirect land use change.
  - The governance of the MBM should be publicly transparent and accountable, and free of conflicts of interest.
8. Is readily and transparently enforceable using existing regulatory authorities, and has provisions for ICAO and its Member States to support developing countries in the MBM's implementation and enforcement.
9. Allows jurisdictions to institute more ambitious aviation carbon pollution reduction measures.

10. Ensures that ICAO builds on its commitment for a 2020 emissions cap and creates provisions to allow aviation to cut carbon pollution to levels actually in line with a safe climate future.
- As the 2013 ICAO Assembly agreed, ICAO must work on an emissions cap that extends beyond 2020.
  - The 2016 ICAO Assembly Resolution must establish a commitment to cut emissions beyond the 2020 cap and mandate the development of measures to achieve this.
  - A “review and ratchet” process would help industry work towards its stated goal of a 50% emissions cut based on 2005 levels, and allow countries to periodically review and strengthen that cap in line with what the science demands and to take into account low carbon technological advancements in aviation.
  - As part of helping the aviation industry reduce its emissions in line with science, ICAO should set the stringency level for the ICAO CO<sub>2</sub> standard for new aircraft to ensure emission cuts beyond what would happen without the standard.
  - ICAO should consider setting additional targets to ensure that in-sector technical and operational emissions reductions are maximized.

*The International Coalition for Sustainable Aviation (ICSA) is a network of non-governmental, non-profit advocacy organizations with millions of members concerned with the environmental impacts of air travel. ICSA is the only environmental civil society organization accredited as an observer in the International Civil Aviation Organization (ICAO), the UN body constituted to develop standards for the international civil aviation sector.*

<http://www.icsa-aviation.org/>