

## Letter to VP Šefčovič, and Commissioners Bulc and Arias Cañete

Brussels

03/06/2016

Dear Vice President and Commissioners,

Talks in Montreal last month to prepare the draft Assembly Resolution for ICAO's Global Market Based Measure (GMBM) for emissions from international aviation have potentially moved us even further away from an effective environmental measure. We, the European NGOs observing the ICAO process, call on European member states, their ICAO Council representatives and the European Commission to take urgent action before the 208<sup>th</sup> June ICAO Council, to call for environmentally effective provisions and save the deal.

We were pleased to see European States working to secure improved language in Montreal on future linking of sectoral ambition to the Paris Agreement and the need for mandatory emissions unit criteria. However, other developments are of grave concern. We call on the EU to ensure the following key issues are addressed:

### Resolve differentiation while limiting exemptions:

The High Level Meeting resulted in further weakening of the scheme's coverage – down from around two thirds to a half of emissions above 2020 levels in the first phase. Eurocontrol has still not transparently quantified this “emissions gap” despite it being an issue of clear public and parliamentary concern.

One reason for the ballooning exemptions is the failure to differentiate the scheme's costs in line with the concerns of developing countries on common but differentiated responsibilities (CBDR). We urge the EU to step up diplomatic efforts on differentiation (paragraph 9 in the draft text), both bilaterally and through the ICAO Council, and to particularly seek out the views of civil society and developing countries. For NGOs the choice is clear: either a fair and robust route-based system - as the EU has previously proposed - or European and North American routes will have to compensate for the ballooning exemptions. We expect Europe to deliver on this.

### Ensure that any pre-implementation phase is concluded before 2020:

A “pre-implementation” or “pilot” phase (as proposed by Singapore) to give stakeholders an opportunity to learn by doing could be a valuable exercise. But any such phase must end by 2020 in order to fully deliver on the carbon neutral growth goal. Any offsets surrendered during the pilot phase must not be carried over to the system proper.

### Protect the European sovereign right to pursue more ambitious regional measures:

Any provision to prevent states from taking more ambitious measures is unacceptable, cuts across European sovereignty and would undermine the EU ETS and Europe's ability to meet its 2030 emissions reduction goals. ICAO ambition must constitute a floor on climate action, not a ceiling.

While we need a global effort through ICAO, we also need ambitious measures at EU level to meet the EU's 2030 goals. The EU negotiating mandate must reflect this.

### Accurate accounting:

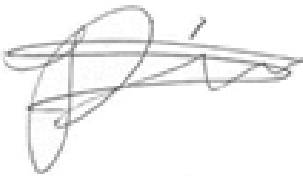
It is unclear how emissions units in a GMBM for aviation would be accounted for in the UNFCCC. Europe must call on ICAO and UNFCCC Parties to align accounting methods to accurately reflect effort and exclude the possibility of double counting. This will ensure the GMBM goes beyond the Nationally Determined Contributions to the Paris Agreement already put forth.

There is currently a very real risk of no deal at all in ICAO, or a deal that sacrifices environmental integrity for the sake of a lowest common denominator agreement. Both these outcomes are unacceptable. We call on the EU to address urgently the elements set out above - both through bilateral and multilateral outreach and at the June ICAO Council. We need an environmentally effective ICAO agreement supplemented by ambitious action at EU level.

Yours sincerely,



**Tim Johnson, Director**



**Jos Dings, Executive Director**



**Aki Kachi, International Policy Director**

