



Brot
für die Welt



Bund für
Umwelt und
Naturschutz
Deutschland



**NATUUR
& MILIEU**



Mrs. Connie Hedegaard,
European Union Commissioner for Climate Action

Mr. Siim Kallas,
Vice-President of the European Commission and Commissioner for Mobility and Transport

Brussels, 30 November 2012

Dear Commissioner and Vice-President,

European NGOs are eager to ensure that the one year “stop the clock” on the inclusion of aviation in the EU Emissions Trading System (ETS) brings real progress towards agreement on a global market based measure (MBM) at ICAO. It must be ensured that this stoppage is limited to solely one year and we set out here what we see as achievable objectives for Europe in the forthcoming ICAO negotiations over this year.

The June 2013 ICAO Council must finalise a proposal for a global MBM whose principles could be agreed at the ICAO Assembly in September 2013. The global MBM should:

1. Be based on a robust reduction target – e.g. 10% below 2005 levels (carbon neutral growth from 2020 is not acceptable) and with a view to a more stringent long-term goal;
2. Come into effect, at the latest by 2016, while allowing for states to implement their own regional schemes earlier in line with the framework;
3. Emissions of operators should be regulated by states on the basis of all outbound flights irrespective of nationality of carrier and generate revenue for national and international climate change purposes, including in-sector emissions reductions and to address the question of CBDR;
4. Be a global emissions trading system;
5. Recognise respective capabilities of states through de minimis, exemptions (on the basis of phased implementation), use of revenues or differentiated obligations, any of these options should be implemented on a route approach and apply to all carriers on that route.

It is critical that substantive progress is made on these issues before the March 2013 ICAO Council and the EU should make this expectation clear early on.

It is further important to mention that when regulating CO₂ emissions from aviation one half - or even three quarters - of the warming effect from aviation expressed in radiative forcing is ignored because the warming from contrails and cirrus clouds are not being discussed as the possible subject of a MBM. Further measures are necessary to counter these effects.

In relation to the Framework discussions which are in parallel to the MBM work, NGOs emphasise that securing an ICAO Framework agreement is far inferior to obtaining a global MBM. At the same time we appreciate that the contents of the Framework are critical for the ETS Aviation Directive. There can be no question but that the basis of the Framework needs

to be outbound flights. This should be a red line in negotiations at ICAO and with Washington but a global MBM must remain the ultimate goal.

As regards the existing legislation, NGOs urge the Commission to work with Member States on the question of auction revenues of flights. In order to further international agreement, the EU should guarantee these revenues will be used, as suggested in the Directive, to support national climate policy and for climate change purposes in developing countries.

Because civil society has not been afforded access to the ICAO negotiations, we look to Member States and the Commission to involve NGOs fully in deliberations on a European strategy.

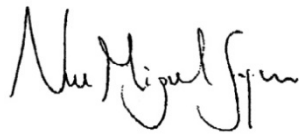
Yours sincerely,



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Jos Dings, Director
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Nuno Sequeira, President
Quercus - Associação Nacional de
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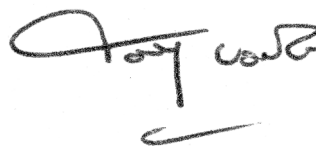
Olaf Bandt, CEO
Friends of the Earth Germany



Klaus Seitz, Head of Policy Department
Bread for the World



Christoph Bals, Politischer
Geschäftsführer
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