

Letter from the International Coalition for Sustainable Aviation to International Civil Aviation Organisation (ICAO) Council Members and the Technical Advisory Body (TAB) regarding the transparency of the TAB's offset programme eligibility assessment.

Dear Members of the ICAO Council,
Dear Members of the Technical Advisory Body,

The decision on which offset programmes should be recognised as eligible under the Carbon Offset and Reduction Scheme for International Aviation (CORSA) will have a crucial impact on the integrity of this market-based measure. We urge you to ensure that the decision-making process be transparent. As we have repeatedly indicated¹, the lack of transparency around CORSA both contradicts ICAO's own transparency rules and endangers the effectiveness of the policy itself by damaging its credibility. The three elements outlined below demonstrate how the lack of transparency around the ongoing process is in contradiction with the Technical Advisory Body's (TAB) Terms of Reference to operate "in a transparent manner".

As part of its assessment of offset programmes' compliance with the Emissions Unit Criteria, the Technical Advisory Body ran a public consultation on programme eligibility over the summer of 2019, and aims to provide its final recommendations to the ICAO Council in early 2020. While we welcomed the opportunity to submit comments to the TAB, the comments received have still not been published. The call for comments published on the CORSA website clearly states that the comments received "may be published online", which means that stakeholders who decided to submit comments were fully informed of the possibility for these comments to be made public. Therefore, there is no reason not to publish the received comments. It is very unusual, and sets a worrying precedent, to conduct a public consultation without making the results available to the public.

¹ See for example our [letter from February 27th, 2019](#), addressed to ICAO Council Members, or our [information note addressed to Parties to the Aarhus Convention](#)

In addition to this, the TAB's Terms of Reference clearly state that programmes will be assessed against the Emissions Unit Criteria (EUC), using the Programme Testing Group's procedures and guidelines for applying the EUC. While the EUC are publicly available on the CORSIA website, there is no direct link to the Programme Testing Group's procedures and guidelines, which means that not all documents used by the TAB to assess programmes' eligibility are easily accessible on the CORSIA website.

Finally, we call upon TAB and Council members to make the TAB's recommendations on programme eligibility publicly available on the CORSIA website, as soon as they are communicated to the Council, and well in advance of the Council's decision on programme eligibility. Transparency will allow civil society and businesses to better prepare for, and assess, the Council's decision on programme eligibility, including whether and how the final decision adopted by the Council differs from the TAB's technical recommendations. In addition, it will allow all stakeholders which have submitted public comments to see how these comments may have been reflected by the TAB in their recommendations.

Transparency and public participation are fundamental principles of democracy and good governance. Citizens have the right to know what their governments negotiate, and to take part in designing policies. For the seven countries represented at the ICAO Council and which are also Parties to the Aarhus Convention², failing to support and promote public access to information on environmental matters is a breach of the international convention they have joined. The practice of holding closed meetings and failing to publish documents prevents any acceptable level of transparency in the ICAO process and therewith the credibility of CORSIA, which is already being seriously questioned around the world.

Therefore, ICSA calls on TAB and ICAO Council members to:

1. Publish without delay all inputs received through the public consultation launched by the TAB, which closed on September 5th, 2019.

² The United Kingdom, Germany, Italy, Sweden, France, Spain and the Netherlands

2. Reactivate a direct access link to the Programme Testing Group's procedures and guidelines on the public CORSIA website.
3. Publish the TAB's recommendations on programme eligibility on the public CORSIA website, as soon as these are communicated to the ICAO Council and well in advance of the Council's final decision on programme eligibility.

We look forward to continuing to engage with ICAO's work, and contributing to limiting the climate impact of the aviation sector.

Sincerely,

Members of the International Coalition for Sustainable Aviation (ICSA)

About ICSA:

The International Coalition for Sustainable Aviation (ICSA) works to reduce pollution from air travel. As a network of nonprofit organizations representing millions of members, ICSA is the only environmental civil society group accredited as an observer by the International Civil Aviation Organization (ICAO), the United Nations standard-setting body for international air travel. ICSA member organizations include Aviation Environment Federation, Carbon Market Watch, Environmental Defense Fund, the International Council on Clean Transportation, Transport & Environment, and WWF. For more information, please visit www.icsa-aviation.org.