

# Public Consultation on EU emissions trading system - updated rules for aviation

Fields marked with \* are mandatory.

## Introduction

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Transport accounts for a quarter of the EU's greenhouse gas emissions, and is still growing. As stated in the 2019 [European Green Deal](#) communication, to achieve climate neutrality, a 90% reduction in transport emissions is needed by 2050. All transport sectors, including aviation, have to contribute to the required reduction.

Aviation in 2019 accounted for 2-3% of global CO<sub>2</sub> emissions. At EU-level, aviation made up 3.8% of total CO<sub>2</sub> emissions, or 13.9% of CO<sub>2</sub> transport emissions in 2017. In addition, aviation is also an important source of non-CO<sub>2</sub> climate impacts with significant warming on climate. Notwithstanding the recent reduction in emissions as a consequence of the COVID-19 pandemic, these impacts could grow further given the sector's historically consistent and enduring over-average growth relative to other economic sectors, including in the EU. While at the global level, CO<sub>2</sub> emissions have been increasing by around 3% per year, aviation's emissions in Europe have increased on average by 5% year-on-year between 2013 and 2018<sup>1</sup>. Pre-COVID-19 estimates by Eurocontrol projected an increase in European aviation emissions by 53% until 2040 compared to 2017 in the scenario deemed most likely<sup>2</sup>. Given the impact of the pandemic, the airline industry does not expect air travel demand to return to pre-COVID-19 levels before 2024. Eurocontrol or the International Civil Aviation Organization (ICAO) have yet to publish any revised longer-term estimates taking into account the impacts of COVID-19.

Based on the policy that all sectors should contribute to the EU's emission reduction commitments, the aviation sector has been included in the EU's Emissions Trading System (EU ETS) since 2012, and, up until 2019, has purchased around 160 million allowances from other sectors to cover its growing emissions. Since the inclusion of the aviation sector in the EU ETS, Article 3d of the Directive provides that 15% of aviation allowances are auctioned based on airlines' historical emissions. While the EU ETS covers emissions from flights landing in and departing from the European Economic Area (EEA), including to and from third countries, the EU has adopted temporary derogations to limit the geographical scope to intra-EEA flights (with the exception of flights to and from EU outermost regions), in order to encourage the development of an effective global carbon pricing scheme by the ICAO.

Following the adoption and entry into force of the Paris Agreement, the 2016 ICAO Assembly adopted a Resolution for a global measure to offset growth in international aviation emissions above 2020 levels<sup>3</sup>, known as the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), which aims to offset emissions through cancellations of international credits.

Pending the development of the rules and modalities for CORSIA, the EU ETS Directive was revised in 2017 to extend the current geographic scope derogation until the end of 2023. The 2017 revision notably requests the Commission to address the specific issues identified in Articles 3d and 28b of the EU ETS

Directive in a report. According to the Directive, the Commission is to present a report to the European Parliament and to the Council (a) assessing CORSIA in relation to a set of features, (b) regarding an increase of the percentage of the auctioning share from the current level and (c) considering ways to implement CORSIA in Union law through the EU ETS Directive. Where appropriate, a legislative proposal should be made that is consistent with the Union economy-wide greenhouse gas emission reduction commitment for 2030, with the aim of preserving the environmental integrity and effectiveness of Union climate action. This work will be considered in the context of the European Green Deal and the objective of enhanced climate ambition for 2030 and climate-neutrality by 2050.

This public consultation invites citizens and organisations to contribute to the assessment of how to revise the EU ETS Directive as regards aviation. Please note that relevant questions and topics may also be covered under other public consultations, in particular the ones for the [EU climate ambition for 2030](#) and for the design of certain climate and energy policies of the European Green Deal and the [Sustainable and Smart Mobility Strategy](#).

<sup>1</sup> Those emissions covered by the EU ETS, not including flights to/from outermost regions, dependencies and territories.

<sup>2</sup> Eurocontrol (2018), European Aviation in 2040.

<sup>3</sup> Due to the COVID-19 crisis, the ICAO Council decided that 2019 emissions shall be used as baseline in the pilot phase instead of the average between 2019 and 2020 emissions. <https://www.icao.int/environmental-protection/CORSIA/Pages/CORSIA-and-Covid-19.aspx>

## Guidance on the questionnaire

This public consultation consists of some introductory questions related to your profile, followed by a questionnaire split into two parts. **Please note that you do not need to respond to both parts of the questionnaire, and can choose to fill in only one of the two. In addition, not all questions in the questionnaire need to be answered.**

The first part of the questionnaire deals with implementation of CORSIA through the EU ETS Directive, including the interaction between CORSIA and the EU ETS for aviation. The second part addresses possible policy changes on free allocation and auctioning of allowances in the EU ETS for aviation. At the end of the questionnaire, you are invited to provide any additional comments and to upload additional information, position papers or policy briefs that express your position or views or those of your organisation. If you select to fill in both parts of the questionnaire, please upload any position papers or policy briefs only once.

## About you

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### \* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English

- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

\* First name

Laurent

\* Surname

DONCEEL

\* Email (this won't be published)

laurent.donceel@a4e.eu

\* Organisation name

*255 character(s) maximum*

Airlines for Europe A4E

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

807912421050-91

\* Country of origin

Please add your country of origin, or that of your organisation.

- |                                      |  |                                     |  |
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| <input type="radio"/> Afghanistan    | <input type="radio"/> Djibouti           | <input type="radio"/> Libya         | <input type="radio"/> Saint Martin                     |
| <input type="radio"/> Åland Islands  | <input type="radio"/> Dominica           | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon        |
| <input type="radio"/> Albania        | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania     | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria        | <input type="radio"/> Ecuador            | <input type="radio"/> Luxembourg    | <input type="radio"/> Samoa                            |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt              | <input type="radio"/> Macau         | <input type="radio"/> San Marino                       |
| <input type="radio"/> Andorra        | <input type="radio"/> El Salvador        | <input type="radio"/> Madagascar    | <input type="radio"/> São Tomé and Príncipe            |

- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria

- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay

- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena, Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

\* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

**Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

**PART I: Market-based measures: EU ETS and CORSIA**

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While the EU ETS and CORSIA are both market-based measures, they differ in various respects, including:

- **Geographic scope:** the EU ETS is a route-based system that includes any flight to or from an EEA<sup>1</sup> aerodrome (with certain exceptions), whereas CORSIA is an operator-based system that covers international flights between participating countries operated by an airline from any country, excluding domestic flights (being defined as flights within a State).
- **Objectives and ambition level:** for the EU ETS the objective is domestic emissions reductions in line with the EU climate objectives, while for CORSIA stabilization of emissions at the level of the baseline through the use of international offsets is the goal.
- **Governance and timeline:** the EU ETS is already legally binding in Union law, and in force since 2012, whereas for CORSIA, whose first phase starts in 2021, States need to develop binding provisions in their domestic legal systems. One of the objectives of the revision of the ETS Directive is to develop these provisions.
- **Type of measure:** the EU ETS is a cap-and-trade system (allowances, a financial instrument, have to be surrendered covering all CO<sub>2</sub> emitted or else, a fine is due) while CORSIA is an offsetting scheme (emissions of CO<sub>2</sub> above a certain level should be compensated by offsets generated by an approved programme).

Against this backdrop, the Commission is considering ways for CORSIA to be implemented in the EU through the EU ETS Directive. Therefore, this questionnaire enquires on the relationship between the two measures.

It should be recalled that in the absence of an amendment legislative act adopted by the European Parliament and the Council of the EU by the end of 2023, the EU ETS will revert to its originally intended scope, covering flights departing from the EEA as of 2024 and, unless exempted, incoming flights to the EEA (see, for example, [Commission Delegated Decision \(EU\) 2020/1071 so as to exclude incoming flights from Switzerland](#)).

<sup>1</sup> Note that the options below refer to EU/EFTA to simplify analysis. However the EU and Switzerland have two distinct emissions trading systems linked since 2020, each system covering the outgoing flights to the other.

1) Do you think that aviation should contribute more to climate action than it presently does?

- Yes
- No
- No opinion

Please explain:

*1000 character(s) maximum*

European airlines are closely exploring potential pathways towards a net-zero, or low-carbon European air transport through reduction of CO2 emissions in absolute terms and CO2 mitigation. A4E members want to be part of the fight against climate change. It is a challenge we face head-on, and one we will only achieve through integrated, cross-sector efforts across policy fields: transport, climate, energy and research. The solution is not to fly less, but to fly more efficiently and more sustainably. Our core objective is that aviation can grow sustainably while continuing to benefit the social and economic development of countries across Europe in the coming decades.

2) Do you think that market-based measures can be effective means of tackling aviation emissions in line with the European Green Deal?

- Yes
- No
- No opinion

Please explain:

*1000 character(s) maximum*

The ETS is the most appropriate solution to limit and reduce CO2 emissions and price CO2. To ensure cost-effectiveness, economic measures must be market-based. Climate policies through national taxes, levies or bans are ecologically and economically counterproductive and distort competition, as they are not applied simultaneously in all Member States. Imposing taxes without reinvesting their revenues in de-carbonization does not help effectively lower emissions from flying, as it hampers connectivity without effectively contributing to aviation's green transformation. Already in the short term, economic measures such as the ETS and CORSIA will contribute to reducing net CO2 emissions and reaching EU and global climate goals. They bridge the gap until breakthrough technologies and sustainable aviation fuels become widely available. By 2050, it is expected that the role of MBMs is reduced when larger contributions come from improvements in technology, ATM and operations as well as SAFs.

3) The European Commission is assessing six policy options of whether and how to implement CORSIA by the EU. These are namely:

- **Option 1 - EU ETS full legal scope:** In case no amendment to the ETS Directive is adopted by the European Parliament and Council by December 2023, the EU ETS for aviation would cover flights departing from airports in the EU/EFTA and arriving to other airports in EU/EFTA or to third countries and, if not exempted through delegated acts, incoming flights to airports in the EU/EFTA from third countries (exercising empowerment in Article 25a of the EU ETS Directive). Flights to, from and within outermost regions would be covered.
- **Option 2 - Intra-EU/EFTA ETS only:** Maintaining the status quo, the EU ETS would be applied exclusively and confined to the geographical scope of the system as currently applied: allowance surrendering obligations for aircraft operators would be based solely on emissions from flights between aerodromes located in the EU/EFTA, with the exception of flights between EU outermost regions and other regions of the EU/EFTA (including other outermost regions), while including flights within any given outermost region<sup>1</sup> (NB: in this option, CORSIA is neither applied to ETS-exempted routes).

- **Option 3 - CORSIA only:** Only CORSIA would be applied to international flights, non-domestic intra-EU/EFTA flights, flights to and from the EU/EFTA States (including their outermost regions) and third countries. As domestic flights are not covered by CORSIA, flights within a Member State would not be covered at all.
- **Option 4 - ETS-CORSIA “clean cut”:** The EU ETS would continue to apply to the current intra-EU /EFTA scope, as in option 2 above, and CORSIA would be introduced for extra-EU/EFTA flights, i.e. flights to and from EU/EFTA States (including their outermost regions) and third countries. In other words, the EU ETS would be applied as at present and CORSIA would be applied to all other flights (to the extent that CORSIA is applicable to them).
- **Option 5 - ETS-CORSIA “mix”:** Regarding non-domestic intra-EU/EFTA flights, the EU ETS would apply up to each operator’s 2020 emissions<sup>2</sup>. Above the 2020 emissions, CORSIA would apply. Regarding flights between EU/EFTA States (including their outermost regions) and third countries, CORSIA would apply on emissions above 2020 levels. This option would cover domestic flights.
- **Option 6 - ETS-CORSIA “mix” according to licence of aircraft operators,** as a variant of option 5: The EU ETS would apply to non-domestic, intra-EU/EFTA flights, operated by operators with licences issued by Member States. For operators with licences issued by third countries, only CORSIA would apply on those non-domestic intra-EU/EFTA flights and flights between EU/EFTA States (including their outermost regions) and third countries. Also contrary to option 5, this option would not cover domestic flights.

<sup>1</sup> Without prejudice to the exemption in Annex I of Directive 2003/87/EC: “(i) flights performed in the framework of public service obligations imposed in accordance with Regulation (EEC) No 2408/92 on routes within outermost regions, as specified in Article 299(2) of the Treaty, or on routes where the capacity offered does not exceed 30 000 seats per year”

<sup>2</sup> Due to COVID-19 impacts, the ICAO Council decided that [2019 emissions shall be used as baseline in CORSIA’s pilot phase](#) (2021-2023) instead of the originally planned average of 2019-2020 emissions.

### 3.1) Which option(s) among these six would be most preferable in your view?

- Option 1 - EU ETS full legal scope
- Option 2 - Intra-EU/EFTA ETS only
- Option 3 - CORSIA only
- Option 4 - ETS-CORSIA “clean cut”
- Option 5 - ETS-CORSIA “mix”
- Option 6 - ETS-CORSIA “mix” according to licence of aircraft operators

Please explain:

*1000 character(s) maximum*

A4E recommends amending policy option 5 to ensure it respects the principle of no double counting of the same emission twice under the ETS and CORSIA. The "EU ETS applying to CO2 emissions not already obligated by CORSIA" should then be fully assessed by the Commission in light of the objectives of the initiative.

### 3.2) Which option(s) among these six would be least preferable in your view?

- Option 1 - EU ETS full legal scope
- Option 2 - Intra-EU/EFTA ETS only
- Option 3 - CORSIA only
- Option 4 - ETS-CORSIA “clean cut”
- Option 5 - ETS-CORSIA “mix”
- Option 6 - ETS-CORSIA “mix” according to licence of aircraft operators

Please explain:

*1000 character(s) maximum*

The policy options currently proposed are unsuitable and fail to meet the stated aims. Option 6 is particularly unacceptable as it would introduce an unfair competitive advantage to non-EU airlines to the detriment of EU-registered airlines in their own home market, i.e. non-domestic intra-EU routes. It is important to ensure that all airlines, whether EU-registered or non-EU, comply with the same obligations in order not to upset the level playing field.

3.3) Is there any other option (or variant of one of the six assessed) that you would prefer instead of the above six and why?

*1000 character(s) maximum*

A4E recommends the assessment of additional policy options that more closely respect the policy objectives announced of 1/ No double regulation of CO2 emissions, 2/ CORSIA implementation in the EU with minimum deviation from the scheme, 3/ Avoidance of market distortion between EU/EEA and third countries, 4/ Highest CO2 mitigation efficiency in the current COVID-19 context, 5/ Long-term regulatory stability and 6/ Limited administrative burden.

4) The EU ETS Directive refers to various aspects that are to be examined in relation to the ambition and overall environmental integrity of CORSIA.

4.1) How would you assess the CORSIA aspects referred to in the EU ETS Directive and listed in the table below?

	Very Positive	Rather positive	Neither positive nor negative	Rather negative	Very negative	No opinion
General ambition in relation to targets under the Paris Agreement	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Level of participation and implementation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enforceability and penalties for non-compliance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Transparency and processes for public input	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Quality of offset credits (i.e. the ability to achieve the effective compensation of CO <sub>2</sub> emissions)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitoring, reporting and verification of emissions (e.g. robustness of the monitoring and verification system)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Registries	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accounting (e.g. avoidance of double counting)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules for the use of eligible fuels: sustainable aviation fuels (biofuels) and lower carbon aviation fuels (fossil fuels) to contribute to emission reductions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Assurance of equal treatment of airlines operating on the same routes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

#### 4.2) Would you like to elaborate on one or more of the aspects listed above regarding the ambition and overall environmental integrity of CORSIA?

*5000 character(s) maximum*

[Max. 500 characters per aspect, i.e. ambition in relation to the Paris Agreement, level of participation, enforceability, etc.]

Aviation is a global activity, therefore a global policy framework is preferred. A4E support CORSIA as the global policy instrument. At least 88 states, representing 77% of international aviation, are covered by the scheme as from 2021. No other industry has a comparable framework. Whilst the scope of CORSIA should extend over time, and further work to improve the scheme's robustness will be welcomed, CORSIA is an unprecedented effort whose success should not be endangered by unilateral moves.

An intra-EU/EFTA regulatory scheme synchronised with CORSIA as a variant to "Option 5" listed in point 3.2. above (ETS-CORSIA "mix") should be further explored, but including provisions ensuring no overlap between measures which would leave the door open to a double counting of the same CO<sub>2</sub> emissions and would ensure no market distortions.

Under such a scenario (possible "Option 7"), CORSIA would apply to CO<sub>2</sub> emissions for all international flights (including intra-EU/EEA flights) as obligated in that scheme. In addition, an evolution of the EU ETS policy as applied to intra-EU/EEA flights would apply to CO<sub>2</sub> emissions that are not already covered by CORSIA. The intra-EU/EEA policy reference year would align with CORSIA (2019) and adopt the same approach to surrender of units above an emissions reduction target, with a choice of units (CORSIA and/or EUAs).

This hybrid system could thereby align EU climate policy closely with CORSIA, whilst respecting the spirit of a single market-based measure instrument for international flights. Close alignment of MRV and design parameters would then reduce administrative complexity.

5) Flights to and from [outermost regions](#) are exempt from the current scope of the EU ETS (see Questions 4 and 5 in the [FAQ on Regulation 421/2014](#)), while flights within a given outermost region are included. The CORSIA rules, in contrast, expect States to regulate non-domestic flights to and from outermost regions. In your view, how should flights regarding outermost regions be covered? Please indicate any of the following reflecting your preference:

	Agree	Disagree	No opinion
Flights within an outermost region: inclusion under the EU ETS (i.e. current situation)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Domestic flights to or from outermost regions: inclusion under the EU ETS (currently excluded until end of 2023)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Non-domestic flights to or from outermost regions: inclusion under the EU ETS (currently excluded until end of 2023)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
International flights to or from outermost regions: inclusion under CORSIA	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your choice considering Art. 349 TFEU that lists the specific constraints of the outermost regions

*1000 character(s) maximum*

6) Considering the European Green Deal, the EU's climate neutrality objective for 2050 and a green recovery...

6.1) ...do you think that market-based measures such as the EU ETS and CORSIA should be combined with other policies such as support for innovative aviation technologies, operational (ATM) improvements, [taxation](#), and the [production and use of sustainable aviation fuels](#)?

- Yes
- No
- No opinion

Please explain:

*1000 character(s) maximum*

To limit the climate impact of air travel, it is essential that a basket of measures be applied simultaneously to allow European aviation to fully contribute to the climate effort while long-term solutions are implemented to reduce emissions. Other policies should therefore include: 1. support the deployment and development of greener aircraft technologies, 2. More efficient operations and infrastructure, and 3. The development of and appropriate support for sustainable aviation fuels (SAFs).

Taxes, on the other hand are environmentally ineffective and would divert the industry's capacity to invest and innovate at a crucial moment where research and development in low carbon technologies should be supported. At the same time, they risk distorting competition, discriminating between actors and risk shifting CO2 emissions to other regions, which is contrary to the desired effect.

## 6.2) ...what level of effort to fight climate change should the aviation sector itself contribute and how should this develop over time?

*1000 character(s) maximum*

Airlines for Europe members commit to work together with all stakeholders and policy-makers to achieve the following climate objectives:

- Reaching Net Zero CO2 emissions by 2050 from all flights within and departing from the EU. This means that by 2050, emissions from these flights will be reduced as much as possible, with any residual emissions being removed from the atmosphere through negative emissions, achieved through natural carbon sinks (e.g., forests) or dedicated technologies (CCS).
- Reach significant net CO2 emission reductions from all flights within and departing from the EU by 2030.

Through these commitments, we aim to align our ambition with the Paris Agreement, recognising the urgency of pursuing the goal of limiting global warming to significantly less than 2°C. By doing so, A4E members are also making a significant contribution to the European Green Deal and EU's climate neutrality objectives.

## 7) Are there any other comments you would like to share?

*2000 character(s) maximum*

These objectives can only be reached through close cooperation between all stakeholders in the value chain and by a collaborative effort between policy-makers and the industry to put the right policies in place to support the transition, (eg. Single European Sky, support to innovative fuels SAFs, hydrogen). In this process, innovation is key, and should be supported. Ensuring a level playing field within Europe and vis-à-vis the rest of the world is also a prerequisite to achieve these objectives.

Considering the strong efforts that will be required to achieve CO2 emission reduction objectives, support for innovative aviation technologies should be proposed and managed at EU level, to ensure equal access by EU airlines. The access to funding programs should also be made clearer for the entire aviation sector where so many programs are very disseminated, making them partially non accessible in practice. Funding aid intensity should also be increased to cover up to 100% of Co2 cost overruns (only for the part beyond the free allowances benefit of course). Bearing in mind that breakthrough technologies will not be available at a realistic scale before minimum 15 years from now, we need also access to support mechanisms allowing to make the bridge timewise.

## PART II: Free allocation and auctioning

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Currently, under the EU ETS, airlines receive a share of the allowances they have to surrender for free, the so-called free allocation. While emitting 68.1 million tonnes of CO<sub>2</sub> emissions in 2019, airlines received free allowances covering 31.3 million tonnes of emissions, or 46% of the total. The remaining 54% were covered by allowances acquired from auctions (approx. 5 million) or from other sectors. (These numbers differ from the percentage of 85% provided for in the EU ETS Directive because the sector's actual emissions have increased and because not all airlines are eligible to receive the allocation, resulting in large variations of the share of free allocation among individual airlines).

The [Political Guidelines](#) for the European Commission 2019-2023 state that there will be a proposal to reduce the free allowances allocated to airlines. This was re-stated in the recent [Communication](#) on a European Green Deal: "the Commission will propose ... to reduce the EU Emissions Trading System allowances allocated for free to airlines". The EU ETS Directive, as revised in 2017, requests the Commission to present a report on the cost pass-through of the aviation sector with the intention of making a proposal to increase the percentage of auctioning, considering alignment with other sectors and the competitiveness between different modes of transport. In this context, cost pass-through refers to the ability of airlines to transfer the cost of required emission units to their passengers (or cargo clients). Among the other sectors under the EU ETS, full auctioning is the method used for allocating allowances in the power sector, while free allocation based on sector benchmarks continues to be used to various degrees for industrial sectors exposed to carbon leakage.

8) Do you agree with the statements that reducing or removing the free allocation of allowances to airlines would...

	Yes	No	Don't know
...increase the climate change mitigation impact by the EU ETS	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
...increase fairness between those airlines eligible to receive the allocation and those that are not	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
...improve the level playing field among transport modes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
...increase the cost of flying for operators and consumers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

9) The European Commission is assessing five policy options as regards the modulation of the share of free allocation, relative to the current situation (a de jure 85% free allocation):

0. Status quo: The current legal situation is perpetuated until 2030, i.e. the 15% auctioning share.
1. Immediate phase-out: 100% auctioning from the entry into force of the revision.
2. Swift phase-out: Full auctioning by 2025, starting with an auctioning share of 60% in 2023, and a share of 80% in 2024.
3. Slow phase-out: A linear increase year-by-year to full auctioning by 2030 starting from 20% in 2023.
4. Slow reduction: A linear increase year-by-year starting with an auctioning share of 20% in 2023 and ending at 55% in 2030.

9.1) Which option(s) among these five would be most preferable in your view?

- Status quo
- Immediate phase-out
-

Swift phase-out

Slow phase-out

Slow reduction

Please explain:

*1000 character(s) maximum*

Modifying the share of allowances auctioned will have no impact on CO2 emissions. Under a cap-and-trade mechanism, the climate benefit is defined by the cap, not by the level of auctioning. If the auctioning of allowances generates revenues for EU and EFTA Members States, it does not lead to an additional mitigation in CO2 emissions from aviation unless the revenues from such auctioning is reinvested into the development or deployment of aviation decarbonization technologies.

For the compliance year 2019, A4E airline members purchased CO2 certificates for around 60% of their emissions. For 2019, the value of these purchases under the ETS reached €650 million. This is a significant contribution to the EU's decarbonization effort coming from an industry currently experiencing one of its worst crises as a result of the COVID-19 pandemic.

9.2) Which option(s) among these five would be least preferable in your view?

Status quo

Immediate phase-out

Swift phase-out

Slow phase-out

Slow reduction

Please explain:

*1000 character(s) maximum*

A4E recommends to take into account the current extraordinary circumstances in the drafting of the proposals related to the increase of the auctioning percentage of allowances. The realities of the large structural changes required to enable the aviation sector to decarbonise should also be considered. For these reasons, any future change in the allocation of allowances should take place only after the crisis has passed.

Similarly, the review of the share of auctioning should not create market distortion within the EU/EEA and globally. To ensure such a level playing field and prevent carbon leakage, decisions related to the free allowances must be handled in conjunction with the establishment of mechanisms seeking to address the displacement of traffic flows or the competitive distortion such as a carbon border adjustment mechanism.

9.3) Is there any other option (or variant of one of the five assessed) that you would prefer instead of the abovementioned five and why?

*1000 character(s) maximum*

A4E recommends to take into account the current extraordinary circumstances in the drafting of the proposals related to the increase of the auctioning percentage of allowances. The realities of the large

structural changes required to enable the aviation sector to decarbonise should also be considered. For these reasons, any future change in the allocation of allowances should take place only after the crisis has passed.

Similarly, the review of the share of auctioning should not create market distortion within the EU/EEA and globally. To ensure such a level playing field and prevent carbon leakage, decisions related to the free allowances must be handled in conjunction with the establishment of mechanisms seeking to address the displacement of traffic flows or the competitive distortion such as a carbon border adjustment mechanism.

10) The conclusions of the European Council in July 2020 invited the Commission to put forward a revised proposal on the ETS, possibly extending it to aviation and maritime sectors in the context of creating new own resources for the EU budget. What are your views on the best use of the revenues from the auctioning of aviation allowances to foster climate neutrality?

*1000 character(s) maximum*

The share of revenues of Member States' auctioning of aviation ETS allowances used in supporting SAFs, fleet renewal or zero-emissions hydrogen and electric technologies is minimal. At European level too, the development of alternative fuels for aviation and zero-emissions technologies should be supported by the EU's ETS Innovation Fund.

In the absence of an alternative to liquid drop-in sources of energy for mainstream commercial flights in the next years, coupled with the commitment for aviation to reduce its CO<sub>2</sub> footprint, the decarbonisation of air transport will have to be achieved by switching to aviation fuels increasingly CO<sub>2</sub> neutral, whilst remaining cost-competitive. The development and deployment of Sustainable Aviation Fuels (SAFs), Research and innovation on alternatives to fossil fuels including hydrogen and electric propulsion are ongoing and should be supported. To mobilise the huge amounts of investments needed, financing for R&D and deployment must be improved.

11) Are there any other comments you would like to share?

*2000 character(s) maximum*

The review of the ETS for aviation rules should consider regulatory improvements concerning the methodology to account for the use of sustainable aviation fuels and other aviation decarbonisation technologies such as hydrogen or electric-propulsion engines in the EU ETS. Anticipating the accounting of the use of these technologies would increase the future-proofing of the rules and provide a clearer regulatory framework supporting their deployment.

## Final remarks

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Should you wish to provide additional information (for example a position paper) or raise specific points not covered by the questionnaire, you can upload your additional document here.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

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