



INTERNATIONAL CIVIL AVIATION ORGANIZATION

Submission from the International Civil Aviation Organization - ICAO to AWG-LCA in relation to the elements contained in paragraph 1 of the Bali Action Plan **(FCCC/AWGLCA/2008/16)**

The submission below was prepared following the text structure of the Assembly Paper - Note by the Chair of the AWG-LCA, *Ideas and proposals on paragraph 1 of the Bali Action Plan* (FCCC/AWGLCA/2008/16). Please note that the suggestion of a specific paragraph for the insertion of the ICAO proposed text in the Assembly Paper is only intended to facilitate its consideration.

Para. 23. (a)

- (iv) Be based on the realization that in a carbon-constrained world, fossil fuels should be used in those applications where alternatives are least available (ICAO);

Para. 23 (b)

- (v) Assign appropriate priority to drivers of economic activity, such as air transport. Such drivers are key contributors to not only the well-being of hundreds of millions of people around the world but also to achieving the United Nations Millennium Development Goals, particularly for less-developed and island countries that rely on air travel to reach international markets for their goods and for attracting business and tourist travel (ICAO);

Para. 23.(c)

- (iv) Regarding the issue of funding adaptation/mitigation measures in relation to climate change through levies imposed on international aviation, ICAO is concerned over the proliferation of charges and taxes on air traffic, aviation being too often used as an easy target to raise revenue in various fields. It is important to remember that whenever levies are applied to address the protection of the environment, the principles of non-discrimination, transparency and cost-relatedness enshrined in the UNFCCC and the ICAO policies on charges and taxes should be taken into consideration, as well as the impact on all parties concerned, in particular the developing countries (ICAO);

Para. 66

- (d) Emissions from international aviation are, by definition, global in nature and are not restricted to national boundaries. Accordingly, the task of assigning them would be extremely complex at best and equally difficult to implement or enforce (ICAO);

Para. 67

- (h) Given the projected growth of aviation emissions, it is essential that aviation is addressed by a global policy framework encompassing a basket of measures of a technological, operational and market-based nature, one that takes into account the specific realities of States, Regions and stakeholders and that the level of emissions to be reduced be based on science-based information (ICAO);

Para. 85

- (h) ICAO is currently preparing a Programme of Action on aviation and climate change, a comprehensive framework for addressing the global impact of aircraft emissions, that is intended to ultimately reflect the shared vision and strong will of all Member States of ICAO to address

emissions from international aviation. It is important to note that the membership of ICAO represents a virtually identical constituency as the States that are parties to the UNFCCC (ICAO);

Para. 129

- (d) Optimum compatibility between environmental sustainability and the safety and efficiency of the global air transport system must not be compromised. An environmentally friendly aviation industry that is not safe or efficient is not viable. An effective and lasting solution to handling emissions from international aviation must therefore involve a global organizational framework encompassing a basket of measures of a technological, operational and market-based nature, one that takes into account the specific realities of States, Regions and stakeholders. This will require unprecedented levels of cooperation with all parties concerned.(ICAO);

Para. 135

- (d) Research and development in aviation technologies, such as advanced materials, improved aerodynamics, and use of alternative fuels, offers great promise and, once developed for aviation, will also trickle down to other sectors for an overall better environmental performance (ICAO);

Para. 140

- (c) Technological research is essential for development in aviation. Although technology alone cannot resolve aviation's emissions of CO₂, it has been and will continue to be a key element of the solution in improving efficiencies in the air transport system. Significant research and development efforts are underway on further reducing aviation's impact on the environment. These efforts are expected to result in technological solutions that will enable a continuing trend of improvement in aviation efficiencies and benefits that, in turn, will allow ICAO to develop appropriate policies. A new and very promising area for research and development is aviation alternative fuels. This could be a win-win solution in that it would reduce aviation's GHG emissions while reducing its dependency on fossil fuels and stabilizing the associated economic volatility (ICAO);

Para. 166

- (e) The main principles of non-discrimination, transparency and cost-relatedness should be considered in any measure contemplated, as well as the impact on all parties concerned, in particular the developing countries (ICAO);
- (f) ICAO is concerned with the simultaneous implementation of several different schemes to address the same aviation CO₂ emissions. Initiatives such as the application of air transport environmental levies, the inclusion of aviation emissions in emissions-trading schemes and the use of aviation emissions offset programmes at a government, airline or individual level, would be directed at the same unit of CO₂ emitted by air transport operations (ICAO);

The text to Para.166 (e) and (f) above also apply to paragraph 172 (c) and (d).

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