

Civil Society Recommendations on the ICAO CORSIA Package

On October 6, 2016, the 191 Member States of the Assembly of the UN International Civil Aviation Organization (ICAO) adopted a resolution establishing the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). CORSIA aims to stabilize the international aviation sector's net carbon dioxide emissions at 2020 and will be in effect from 2021-2035. On December 5, 2017, the ICAO Secretary General distributed to all ICAO Member States the draft Standards and Recommended Practices (SARPs), also known as the CORSIA Package,¹ to implement CORSIA. ICAO Member States can send their comments on the CORSIA Package to the ICAO Secretary General **by March 5, 2018**. The International Coalition for Sustainable Aviation (ICSA)² developed this summary document to aid States in their responses to the CORSIA Package. This summary document is derived from the ICSA's full report, "Understanding the CORSIA Package, A critical guide to key provisions in the draft Standards and Recommended Practices and related guidance material for the UN International Civil Aviation Organization's Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)" which can be found at <http://icsa-aviation.org/understanding-the-corsia-package/>.

While the majority of the CORSIA Package is technically sound and should be maintained, ICSA identifies several areas of the CORSIA Package that must be strengthened before the Package is agreed in order for CORSIA to function properly and achieve its environmental purpose.

ICSA's top-line recommendations on the CORSIA Package are:

- **CORSIA reporting as proposed in the CORSIA Package is not sufficiently transparent.** Allowing third parties to access aeroplane operator emissions reports would help ensure the environmental integrity of CORSIA and avoid market distortion by deterring special treatment of carriers. However, if States choose to keep the CORSIA Package text as it is, the burden is on them to actively verify other States' emissions reports with the tools and approaches currently laid out in the SARPs.
- **The CORSIA Package must continue make clear that *only* CORSIA Eligible Emissions Units can be used for compliance with CORSIA.** A State must not be able to apply these criteria or some other criteria unilaterally.
- **ICAO should refrain from crediting aviation alternative fuels under CORSIA until the sustainable aviation fuels provisions in the CORSIA Package, particularly the sustainability criteria, are strengthened.**³ The sustainability criteria—the criteria against which aviation alternative fuels are evaluated to be eligible for credit under CORSIA—must be strengthened to encompass not only emissions reductions of the fuels, but also their social, economic, and other environmental sustainability attributes. Comprehensive, robust sustainability criteria should be included in the final CORSIA Implementation Elements before the CORSIA pilot phase begins on January 1, 2021.
- **States should publicly disclose their responses to the CORSIA Package State Letter.** If a critical mass of States discloses this information, it will encourage greater public confidence in this ICAO State Letter process, including any text changes made by ICAO or the ICAO Council.

The table on the following page provides a summary of all ICSA recommendations.



- ¹ The draft CORSIA Package is available at http://icsa-aviation.org/wp-content/uploads/2018/01/ICAO_CORSIA_draft_-SARP.pdf
- ² 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. For more information, please visit www.icsa-aviation.org.
- ³ According to the CORSIA Package, an aviation alternative fuel is defined as "[a] non-petroleum-based drop-in aviation fuel," (page A-10). Sustainable aviation fuels are defined as "[an] aviation alternative fuel that meets the CORSIA Sustainability Criteria" (page A-11). ICSA stresses that aviation alternative fuels should not be classified as "sustainable" unless they meet comprehensive and rigorous sustainability criteria.

Summary of all ICSA recommendations

TOPIC		ICSA RECOMMENDATION
Processes to translate CORSIA's emissions coverage through State pairs		MAINTAIN No changes recommended.
Emissions monitoring, reporting, and verification procedures		ENHANCE Allowing third parties to access aeroplane operator emissions reports would help ensure the environmental integrity of CORSIA and avoid market distortion by deterring special treatment of carriers.
Emissions unit quality	Emissions units criteria for selection of CORSIA Eligible Emissions Units	MAINTAIN While ICSA has some concerns about certain aspects of these criteria and notes the need for their continuous elaboration, they are fit for purpose and we recommend no changes to them at this point in time.
	Eligible emissions units under CORSIA	ENHANCE The note under Section 4.2.1 should be duplicated in the document "ICAO CORSIA Implementation Elements, Section 2.4 CORSIA Eligible Emissions Units (page C-15)."
Sustainable aviation fuels	Sustainability criteria for aviation alternative fuels	ENHANCE Comprehensive and robust sustainability criteria should be included in the final CORSIA Implementation Elements before the CORSIA pilot phase goes into effect on January 1, 2021, to avoid unsustainable aviation fuel production being encouraged and potentially grandfathered in later phases.
	Structure of the eligibility framework for sustainability certification schemes (SCS)	MAINTAIN The structure of the eligibility framework for SCSs currently captured in the CORSIA Package is the right way forward and should be maintained.
	Default life cycle assessment (LCA) values for sustainable aviation fuels	ENHANCE The underlying life cycle assessment methodology should be maintained. However, some current research suggests that wastes, residues, and by-products, such as PFAD, have indirect emissions associated with them, even though these fuel feedstock categories currently qualify as having zero indirect emissions, including zero ILUC. Therefore, the default LCA values should be revisited by CAEP alternative fuels experts, taking into account the associated indirect emissions, no later than the start of the CORSIA pilot phase (January 1, 2021).
	Actual life cycle assessment (LCA) values for sustainable aviation fuels and the role of sustainability certification schemes (SCSs)	ENHANCE Several elements in the text of Section 2.3.2 of the Implementation Elements need to be modified in order to (1) consistently characterize who will apply the methodology within the CORSIA Package, and (2) to ensure that references to ICAO CORSIA Supporting Documents are correct.
Procedures for aeroplane operators to register and report their use of emissions units and sustainable aviation fuels	Cancelling CORSIA Eligible Emissions Units for compliance	ENHANCE The text in the note on definition of cancellation under Section 4.2.2 should be changed from a "note" to text and be moved to Part I. Definitions, Abbreviations and Units; Chapter 1.— Definitions (page A-10). The recommendation in Section 4.3.3 should replace the word "publish" with the words "publicly communicate on a webpage and subsequently include this link in their emissions unit cancellation report to ICAO, as defined in Appendix 5 Table A5-8, using an ICAO approved form" when describing the elements for States to publish.
	Ensuring that emission reductions are not counted twice	MAINTAIN No changes recommended at this time. However, it will be paramount that ICAO strictly adhere to the "Avoidance of Double Counting, Issuance and Claiming" criterion as it evaluates offset programs.
	Monitoring, reporting, and verification (MRV) of sustainable aviation fuels	ENHANCE The current MRV system for sustainable aviation fuels is not well-equipped to address high volumes of alternative fuels. Additional MRV procedures, need to be developed in order to avoid double claiming of SAF and ensure the environmental integrity of CORSIA.