



Mr Jos Dings
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Dear

With this letter the Green 10 group of environmental NGOs would like to draw your attention to the intended Commission communication 'Reducing the climate change impact of aviation', which is scheduled to be decided upon in the College meeting of 27 September. The Communication is expected to propose the inclusion of CO₂ emissions from European flights into the EU Emission Trading System (EU ETS).



Although the environmental NGOs have always stressed that an appropriate climate policy for the sector requires a broader package of measures, we urge you to swiftly publish this important communication as a first and necessary step, and to issue a concrete legislative proposal to tackle the climatic impact of aviation as soon as possible thereafter.



We base this advice on the following grounds:

Environment: the issue is more than urgent

Aviation already accounts for 5 to 12 per cent of the EU's impact on the climate. Air travel is the fastest-growing source of greenhouse gas emissions. Emissions from international aviation are not tackled through the Kyoto Protocol or any other environmental policy. Last March, EU Heads of States pledged to limit climate change to 2 degrees and said that a 15 to 30 per cent reduction in emissions would therefore have to be considered. This target will be totally out of reach if aviation emissions remain unchecked¹.



Friends of the Earth Europe

Subsidiarity: the EU is the appropriate regulatory level

Obviously, the character of the aviation sector is too international to expect much from individual Member States.

But the international level is not appropriate either. ICAO, the UN's aviation agency, has explicitly endorsed setting up an emission trading system by its Contracting States, and ruled out establishing such a system itself.



Competitiveness: an opportunity, not an obstacle

The impact on competitiveness of the EU *airlines vis-à-vis* their foreign competitors will be negligible. The study on the topic done for the Commission² concludes that '*introduction of none of the three policy options would affect the operating efficiency of EU carriers significantly compared with non-EU carriers*' and '*although aviation is an international business, it is less vulnerable to economic distortions [as a result of the introduction of an emissions trading system] than other sectors of the EU economy*' (p16). The main reason for these conclusions is that the system will treat carriers on EU routes equally, regardless of their nationality.

In addition, this policy is very likely to benefit the airframe and engine *manufacturing* industry. It provides an incentive to replace older aircraft by newer ones that have a better environmental performance.



¹ Tyndall Centre for Climate Change, *Growth scenarios for EU & UK aviation – contradictions with climate policy*, April 2005

² CE Delft, *Giving wings to emission trading*, Delft, July 2005

Support from important stakeholders

The policy at stake has received strong support during the Commission's internet consultation and from all relevant stakeholders. The EU Presidency, the European Parliament, the Airports Council International, the Association of European Airlines and NGOs have publicly all expressed support for inclusion of aviation into the European emissions trading system.

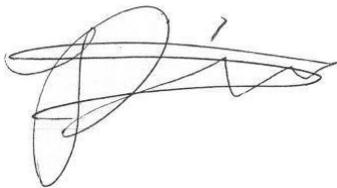
A clear way forward is needed now

The Commission has been considering pros and cons of different climate policies for aviation since 1999, when the first study on the matter was published. So far the only policy has been to 'keep all mitigation options open'. All options have been studied now in depth, and there is ample technical and scientific understanding of their pros and cons. While no door should be definitively shut, a clear choice is to be made now.

Any short-term issues related to high oil prices cannot be an excuse for not taking a decision on the future climate policy for aviation now. On the contrary, the policy at stake is a structural element in reducing the EU's oil consumption and oil dependence – which is expected to reach 86% by 2020.

There is no reason to prolong uncertainty. It is clearly time to decide, and act. We therefore urge you to pursue the publication of this long-awaited and indispensable communication, and to publish a concrete proposal to tackle the climatic impact of aviation as soon as possible thereafter.

Your sincerely,



Jos Dings
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On behalf of

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Matthias Duwe, Director, Climate Action Network Europe
John Hontelez, Secretary General, European Environmental Bureau
Genon K. Jensen, Director, European Public Health Alliance Environment Network
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