

**SUBMISSION BY ROMANIA AND THE EUROPEAN COMMISSION ON  
BEHALF OF THE EUROPEAN UNION AND ITS MEMBER STATES**

**Item 8(e) Emissions from fuel used for international aviation and maritime transport  
of the 50th session of the Subsidiary Body for Scientific and Technological Advice**

Bonn, 20 June 2019

The EU welcomes the co-facilitators' invitation to submit its views on this agenda item.

Together, international aviation and maritime transport account for almost 5% of global CO<sub>2</sub> emissions. Furthermore, aviation emissions other than CO<sub>2</sub> also have an impact on global warming. We are concerned by current trends, as well as by predictions showing the expected strong emissions growth of these sectors under a business as usual scenario. In the Paris Agreement, Parties set ambitious temperature goals and agreed to achieve a balance between anthropogenic emissions by sources and removals by sinks of greenhouse gases in the second half of this century. All economic sectors, including international aviation and maritime transport, which are clearly anthropogenic, have to contribute to attaining these goals. Any sector that fails to reduce its emissions puts the global effort to combat climate change at risk. Therefore, robust and adequate action should not be delayed.

We welcome the efforts made by the International Civil Aviation Organization (ICAO) and the International Maritime Organization (IMO) in addressing international transport greenhouse gas emissions. In particular, we welcome the adoption in April 2018 of the Initial IMO Strategy on reduction of GHG emissions from ships which includes the long-term target to decarbonise international shipping as soon as possible and the adoption by the ICAO Assembly in 2016 of a global market-based mechanism (GMBM) in the Carbon Offset and Reduction Scheme for International Aviation (CORSIA) as important steps in mitigating GHG emissions from international aviation and maritime transport.

We also welcome the follow-up work to implement these decisions, while expressing concerns on the need to enhance its implementation through the adoption and implementation of effective remaining and complementary measures. For international shipping some progress has been made, in particular the agreement on strengthening the EEDI phase 3 requirements for new ships at MEPC 74, to be adopted at MEPC 75 in April 2020. We furthermore welcome the approval of the terms of reference of the Fourth IMO GHG Study, and the approval of the procedure for assessing the impacts on States of candidate measures. However, no agreement has been reached on the prioritisation of work on meaningful reduction measures, nor on the working arrangements required to swiftly implement the initial IMO GHG reduction strategy. ICAO has made significant progress through the adoption of the CORSIA SARPs in 2018, as well as through agreement of some implementation elements, which includes the Emissions Unit Criteria which will be used to assess emissions unit programmes, and the creation of the Technical Advisory Body (TAB). We look forward to the adoption of the full set of robust implementing rules, including on vintages, timeframes and provisions for the operationalisation of no double counting to complement the adopted Emission Unit Criteria and Sustainable Alternative fuel criteria, leading to a successful start of CORSIA in 2021.

On this background the EU wants to draw attention to two issues:

**Short- and long-term mitigation ambition:** International aviation and international shipping should contribute to keeping global temperature rise well below 2°C and pursuing efforts to stay below 1.5°C. Greenhouse gas emissions from shipping and aviation should therefore be addressed accordingly through their respective specialised UN agencies in a way that does not lead to carbon leakage or distortion of competition within the respective sectors and with other means of transportation.

As the EU, for international shipping, we call on IMO to adopt ambitious short-term measures to help peak emissions and keep in line with the requirement in the strategy to achieve reductions before 2023. We also encourage all Parties to submit proposals for ambitious mid- and long-term measures to MEPC 75 to allow work on mid- and long-term measures to be initiated in time to ensure their timely approval and contribution to the emission reduction goals agreed in the IMO Initial Strategy.

Taking into consideration the long-term goal adopted by the aviation industry, which aims to reduce its net emissions by 50% by 2050, and the goals recently adopted by IMO, we furthermore consider it necessary to establish a long-term goal for international aviation within ICAO which is consistent with the well below 2°C/1.5°C scenario at the 40<sup>th</sup> ICAO general Assembly (September-October 2019). In this context, due consideration should be given to non-CO<sub>2</sub> climate impacts from aviation.

**Environmental integrity:** For the EU, environmental integrity as a guiding principle is key when designing policy instruments (including MBMs). Therefore, a key priority for the EU during these negotiations is to ensure the avoidance of double counting. This includes ensuring that there are corresponding adjustments for offsets used towards non UNFCCC schemes that contribute to the Paris Agreement goals, such as CORSIA. Without clear rules to avoid the double counting of offsets, we see a severe risk that mitigation efforts are undermined and do not result in reducing global GHG emissions.

All policies adopted under ICAO and IMO should, in the same spirit as agreed for NDC's under the Paris Agreement, allow for highest ambition possible and increasing ambition over time to achieve absolute emission reductions as soon as possible. Both sectors' contributions should be taken into account during the global stock take of the UNFCCC. As the EU, we aim at cooperating with other Parties and working through ICAO and IMO, with a view to lowering the emissions from international civil aviation and maritime emissions and their impact on the climate.

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