Avoiding double-counting under CORSIA

In 2009, the aviation industry set three global goals to address its climate impact: an annual average fuel efficiency improvement of 1.5% from 2009 to 2020; the stabilization of net CO₂ emissions at 2020 levels; and, by 2050, the reduction of net CO₂ emissions to half of what they were in 2005.

IATA views the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) of the International Civil Aviation Organization (ICAO) as a critical element of the aviation industry’s strategy to mitigate its impact on climate change. It is estimated that CORSIA will result in the mitigation of at least 2.5 billion tonnes of CO₂ between 2021 and 2035. By way of context, this is more than the total volume of offsets ever issued under the Clean Development Mechanism or traded in the voluntary carbon market.

The agreement in ICAO was a major political achievement as the diverse views of ICAO’s 192 Member States were reconciled in a single mechanism which takes into account their respective circumstances and capabilities. International cooperation, including in addressing environmental impacts, is critical for a sector like aviation. This is why, in 1944, signatories to the Chicago Convention committed to collaborate in securing the highest practicable degree of uniformity in regulations and bring their domestic regulations in line with the international standards adopted by ICAO as Annexes to the Chicago Convention.

The aviation sector is committed to advances in technology, operations and infrastructure to continue to reduce the sector’s emissions. Offsetting is not intended to replace these efforts. Nor would CORSIA make fuel efficiency any less of a day-to-day priority. Instead, CORSIA can help the sector achieve its climate targets by complementing emissions reduction initiatives within the sector.

Offsetting and carbon markets are fundamental components of global, regional and national emissions reduction policies. They have operated for decades for compliance purposes and voluntary emissions reductions, and continue to be an effective mechanism to underpin action against climate change. There are many ways to achieve greenhouse gas emissions reductions that can be used as offsets, many of which bring other social, environmental or economic benefits relevant to sustainable development.

To ensure the environmental integrity of CORSIA, ICAO will adopt a list of emissions units that can be used for compliance. ICAO’s decision will be guided by eligibility criteria to guarantee that emissions units deliver the desired greenhouse gas emissions reductions.

IATA is confident that the emissions unit eligibility criteria, which are based on principles commonly applied under existing trading mechanisms and well-accepted carbon offset certification standards, provide a robust framework for the evaluation of offset programs and project types and that their application will maintain market access whilst ensuring that eligible emissions units bring about genuine emissions reductions.

IATA supports the approach taken by ICAO to address the risk of double-counting under CORSIA. The approach, whereby the risk of double-counting is addressed at the level where it would occur, is the most effective. Any potential double-use by an aircraft operator is to be addressed through the verification by an independent third party of the emissions unit cancellation report, in which detailed information on the emissions units used by an operator will be reported. In addition, the emissions unit eligibility criteria require that emissions unit programs have measures in place to avoid double-counting.

While it is beyond the remit of ICAO, we would like to emphasize that IATA believes that the Conference of the Parties to the United Nations Framework Convention on Climate Change needs to deliver clear guidance, as soon as possible, to address in an effective way the situation where a country which hosts emissions unit programs might also seek to count the reductions associated with units used for CORSIA towards its own mitigation pledges. Robust rules on double-counting will give aeroplane operators confidence that the emissions units they use are not claimed by another party and that their environmental integrity is preserved.