

# European Business Aviation Association

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# BusAv Committed to Minimising Impact on Environment at the global level



- improved fuel efficiency by 40% over the past 40 years
- plus industry committed to:
  - 2% improvement in fuel efficiency per year from now until 2020 on a fleet-wide basis
  - A reduction in its total CO2 emissions by 50% by 2050 relative to 2005
  - participating in market-based measures

**But....**

## ...EU-ETS is a Mess!



- with no small emitter threshold for non-commercial operators, the system is **disproportionate and unworkable**
- “the list” published in February is full of **inconsistencies and errors**

# EU-ETS Way Forward

1. Eurocontrol Support Facility
2. Raise the small emitter reporting threshold
3. Raise the Framework ETS Directive exemption threshold for non-commercial operators
4. Auctioning for Small Emitters



# ETS Support Facility

- EBAA supports Eurocontrol's ETS Support Facility and has been working hard for its validation as a simplified MRV tool
- No need for additional case by case verification as the tool would become useless
- Users of this tool will have to cover all the Eurocontrol costs including overheads

## Small emitter reporting threshold

- Raise the simplified Monitoring, Reporting and Verification procedure's threshold for small emitters in accordance with the accuracy required by the EU regulations
- If the ETS Support Facility is within a 2% accuracy margin the threshold could go as high as 500,000 tonnes of emissions per year

# Level playing field between commercial and non-commercial

- Raise the framework ETS Directive exemption threshold for non-commercial operators to 10,000 tonnes of CO<sub>2</sub> per year as commercial operators
- The inclusion of non-commercial operators from the first tonne of CO<sub>2</sub> is creating a huge administrative burden for operators, administration as well as raising the costs for all whilst the environmental benefit is minimal

# Auctioning for small emitters

- Commission has released a draft. We feel our needs are not well taken into account. It is essential the following is ensured:
  - Member States to hold easily-accessible auctions, open to all recognised aviation emitters regardless of size
  - Protected allocation of auctioned permits for small aviation emitters, in multiples of one tonne
  - Proportionality between the purchased amount and the price
  - The minimum required amount of credits to be able to access the system needs to be small to take into account small emitters