

Public consultation on EU Emissions Trading Scheme (EU ETS) – Monitoring, Reporting and Verification (MRV) for Aviation

1 INFORMATION ON THE CONSULTATION

This internet consultation is available only in English.

All the background documents for this consultation can be found at [Aviation webpage](#)

Please send your contribution to this e-mail address [ENV AVIATION QUESTIONNAIRE](#)

The results of this survey will be published on [the Aviation website](#) and will be used as an input for guidance that will be developed by the Commission on MRV for aviation sector in the EU ETS.

This internet consultation will open on 7 October 2008 and will close on 3rd November 2008. No further contributions will be accepted after that date.

Please note that this consultation does not prejudice the final form of any decision to be taken by the Commission. The consultation should not be considered an opinion poll or a forum for voting about these issues. The Commission's aim is to generate the widest possible set of responses.

2 BACKGROUND INFORMATION ABOUT YOU

Please provide some information about yourself or your organisation before proceeding to the questionnaire. Your comments will not be processed unless you provide us with this background information.

2.1 *My role in answering this questionnaire*

Please tick as applicable

I am responding as a private individual	
I represent an organisation	X

2.2 *Name of the organisation*

CLECAT

2.3 *Purpose of the organization*

INTEREST REPRESENTATIVE

2.4 Size of the organisation

Please tick as applicable

Up to 10	
11-100	X
101-1000	
More than 1000	

2.5 Country of residence

BELGIUM

2.6 Contact details of the organisation

RUE DU COMMERCE 77
B- 1040 BRUSSELS
TEL: +32 2503 4705
FAX: +32 2503 4752
EMAIL: INFO@CLECAT.ORG

2.7 Type of the organisation

Please tick as applicable

Individual aircraft operator (go to question 2.8)	
Commercial aircraft operator	
Non-commercial aircraft operator	
Other individual private company	
Industry association	X
Competent Authority	
Other public sector organisation	
Academic organisation/thinktank	
Environmental NGO	
Other NGO	
Other (please specify)	

2.8 Size of individual aircraft operator [This question only addressed to those organisations that in question 2.7 have selected "Individual aircraft operator"]

Please tick as applicable

(number of flights per year)

Up to 10.000	
10.000-50.000	
50.000-100.000	

More than 100.000	
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3 QUESTIONNAIRE

The following questionnaire is based on the [consultation document](#). Questions in the consultation document are numbered similarly as in this questionnaire. Please read carefully the consultation document and provide answers to all questions relevant for yourself or your organisation. There are not space limits for your responses, but please limit your answers to the specific content of the question. For general comments please fill up the section “other issues/additional comments” at the end of the questionnaire.

3.1 *Administrative processes*

Tonne-kilometre data

Question 1- Should there be common dates, set by the Commission, across all MS for the submission of tonne-kilometre monitoring plans to Competent Authorities, and for the approval of tonne-kilometre monitoring plans, or should the deadlines be left open for each Competent Authority to set to reflect their own circumstances?

In the interest of harmonization and an EU wide application of the rules, we prefer a common date, set by the Commission, across all MS. Thus it can be avoided that users are faced with different demands from Member States.

It makes sense to have one date, which will be applied in all MS. This is the only way to avoid distortion of competition and allow for confidential data. Different dates could as a result lead to the outsourcing or relocation of airline operators to MS, where restrictions are less stringent. It also has to be taken into account that the date for allocating allowances is set already, so that there would not be much leeway for MS anyway.

Question 2- If common dates should be set by the Commission for the submission of tonne-kilometre monitoring plans to Competent Authorities, and for the approval of tonne-kilometre monitoring plans, do you agree with the timing proposed in this document?

CLECAT does not object to the dates in this document. The Commission should however ensure that operators have the ability to comply with the dates. It has to be taken into account that many operators are in fact Small and Medium Enterprises that deal now with stringent changes in the areas of security and customs. This puts financial burdens and time constraints on them. It should therefore be ensured that this is taken into account and possible transition dates are included – if possible.

Annual emissions

Question 3- Should there be common dates, set by the Commission, across all MS for the submission of annual emissions monitoring plans to Competent Authorities, and for the approval of emission monitoring plans, or should the deadlines be left open for each Competent Authority to set to reflect their own circumstances?

Common dates are preferred.

Question 4- If common dates should be set by the Commission for the submission of annual emissions monitoring plans to Competent Authorities, and for the approval of emission monitoring plans, are those proposed in this document suitable?

Yes.

Question 5- How should it be ensured that maximum benefit is derived from experiences learned during the pre-trading scheme monitoring period?

Apply all the mechanisms for the actual regime, which will come into effect in 2012. Do the validation as well. Thus the EU and operators should be prepared for the time after the 'dry-run', while it has to be clear that no stringent penalties await wrong declaration. As this is comparable to a test-run, operators should encounter a certain leniency from authorities.

Question 6- Do you think that the submission of an updated monitoring plan before the start of the first trading period in 2012 will contribute to improve the quality of monitoring and reporting in the emissions trading period? If yes, how and in what areas of the monitoring plan?

Yes, we think that the EU and the operators can benefit of an early application. The sooner operators can make themselves known with the new regime the better.

3.2 Monitoring and reporting: Main Issues

General issues

Question 7-In which circumstances would the ICAO designator not be considered as the appropriate way to define the aircraft operator?

ICAO is a viable choice for defining aircraft operators, as the organisation is best suited to define the ownership of flight routes, which are the means to identify the aircraft operator.

Question 8- What evidence should be required to ensure that applications to the special reserve refer to additional or new activity?

CLECAT welcomes the possibility to gain additional allowances, if airlines are entering the market or outperform their expectations. In our opinion increase in operations may exceed the reserve of 3%.

Question 9 - Is listing flight routes in a monitoring plan for tonne kilometre data sufficient to gauge potential expansion of aircraft operators? How could it be demonstrated that this growth is not a continuation of an aviation activity previously performed by another aircraft operator?

In our opinion this would be sufficient. We also do not see a problem, if aviation activity has been previously allocated to another operator. Either this means that operator is out of business or it was taken over by the first operator in question. Both ways the operator has gained additional flight routes, without this resulting in the necessity of additional allowances. Only if new, additional allowances would have to be allocated, this would result in the fact that no new allowances could be given to the operator.

Monitoring and reporting tonne-kilometre data

Question 10 - Do you consider a standard source of GCD data from Eurocontrol as the most appropriate approach for your needs? If not, explain why and detail what would be the preferred approach for your specific situation.

We would opt for option 1 with a standard source of GCD from Eurocontrol to achieve consistency and harmonization. The negligible problem, what happens if Eurocontrol does not have the data, will be rectified once the first flight operates to the former 'unknown' airport. As a result the data will be monitored for this flight and can then be taken into account in the future.

Question 11-If an aircraft operator chooses to use measurements of actual passenger weight, what type of weighing instruments are used in the industry and what are their typical levels of uncertainty across a whole year?

CLECAT does not have the competence of passenger operations.

Question 12- For non commercial operators, where freight and mail mass data are not required by JAR-OPS/EU-OPS what type of weighing instruments are used for weighing freight and mail mass and what are their typical levels of uncertainty across a whole year?

Weighing of cargo is sufficiently reliable for the purpose.

Question 13 - Do you consider that an uncertainty assessment should be required for tonne-kilometre data? If so, in which cases? and what would be the added value of this?

No, we do not think it is necessary.

Question 14 - For competent authorities, do the proposed tonne-kilometre templates fit your purpose?

Not applicable, CLECAT members are not airlines.

Question 15 - For operators, do the proposed tonne-kilometre templates fit your purpose?

Not applicable, CLECAT members are not airlines.

Question 16 - Are there other parameters that should be covered in the tonne-kilometre templates? If so, which?

Not applicable.

Question 17 - Is there a need to link to the content of the tonne-km templates to special software/databases? If yes, which ones?

Not applicable.

Monitoring and reporting annual emissions

Question 18 Do you think that different levels of accuracy (or uncertainty) in monitoring and reporting of annual emissions should be required for different aircraft operators according to pre-defined categories of operators per annual emissions?

This might be an initial help, but accuracy should eventually be the aim.

Question 19 If yes, what are the reasons and what would be the benefit of such differentiation?

Phasing in.

Question 20 Do you consider minor and de minimis sources relevant in the context of the aviation sector? In which situations?

As you point out, the provision of minor and de minimis sources was intended for occasional usage in stationary installations. While it is of course not the general rule that infrequent flight occur, it might be worth taking into account that alternative fuels, especially the wider category of bio-fuels, are more and more used in airplanes as well. While today most of these flights are test-runs, the move to bio-fuels in the future will be further enhanced, as soon as it is a viable economic alternative. So far flights with biofuels could therefore fall under the minor and de minimis rule, as special rules will be adopted for bio-fuels.

Question 21 If you consider that minor and de minimis sources warrant consideration in the context of the aviation sector, would the thresholds considered for stationary installations be applicable and for which kinds of flights not falling under the current exclusions?

The thresholds for stationary installations cannot be transferred into the aviation sector per se. However, if there is no other source of information, the thresholds can be used until more information is available for the aviation sector, e.g. after one year of application.

Question 22 Is there a standard level of uncertainty for fuel metering in the industry, which could be proved through calibration certificates? Please provide details of sources proving the level of uncertainty in fuel metering in the aviation industry (eg. according to metering devices, suppliers specifications or to safety requirements)

Not applicable.

Question 23 Is there any specific requirement for the use of standard fuel density factors in the industry?

Not applicable to CLECAT members.

Question 24 Should the MRV guidelines for aviation explicitly mention (temperature dependent) standard density conversion factors to be used in fuel measurement? In this case, which would be the most appropriate standard density values applied to aviation fuels and why?

Fuel density varies according to temperature, therefore an adjustment factor is logical.

Question 25 Should density measurement be required every time instead of using standard values? What would be the benefit of this?

Standardized measures would be less cumbersome.

Question 26 Are there any barriers that prevent some aircraft operators from gathering data on actual fuel consumption per flight? Could you please describe the situations where this data would not be available?

Not applicable to CLECAT members.

Question 27 Could aircraft operators not able to provide information on fuel consumption per flight provide instead total annual fuel consumption figures for their operations covered by the EU ETS? In this case, what estimation method could be used to ensure that fuel consumption covered by the EU ETS is not underestimated?

Not applicable to CLECAT members.

Question 28 The MRG 2007 Decision requires that all information needed to reconstruct reported emissions data, including all fuel consumption data, should be kept for at least 10 years. Would there be any obstacles to data storage for this period? How could these obstacles be overcome?

We do not see any obstacles to that requirement. Data storage is rather easy and cheap nowadays. However the period of 10 years seems too long, operators should be able to provide the data, electronically for no longer than 3 years.

Question 29 Do you want to have the option of using specific values for NCV to define the energy content of aviation fuels or would you prefer standard values for everyone?

We would prefer option 2, i.e. have flexibility and simplification. A single standard approach will avoid comparative disadvantages and lead to further harmonization and clarity.

Question 30 If standard values are used would the IPCC default values for NCV be appropriate? If not, why not?

As the IPCC values are nowadays common scientific knowledge, they can be a good basis for default values.

Question 31 How accurate in practice is the NCV data provided by fuel suppliers?

Quite accurate.

Question 32 If none of the above options is appropriate for your specific situation, which would be your preferred method to provide accurate NCV for aviation fuels?

Not applicable to CLECAT members.

Question 33 Do you want to have the option of using specific values for emission factors of aviation fuels or would you prefer standard values for everyone?

It is preferable to use a standard value to ensure harmonization and avoid any distortion of competition.

Question 34 Would IPCC default emission factors expressed as tCO₂/TJ be considered as an appropriate standard value for all aircraft operators? If not, please explain why.

We agree that the IPCC default emission factor could be used as standard.

Question 35 Are there any barriers or concerns for aircraft operators developing activity-specific emission factors expressed as tCO₂/TJ?

Not applicable to CLECAT members.

Question 36 Could standard emission factors expressed as tCO₂ per tonne of fuel provide a more accurate measurement of emissions at lower costs? Could you provide official references for these standard emission factors?

They would probably not provide a more accurate measurement, but they may be easier to handle.

Question 37 Which situations could you consider that would require the use of a fall-back approach?

CLECAT does not have sufficient information to answer this question.

Question 38 What would be the minimum requirements for the approval of fall-back approaches by the Competent Authority?

CLECAT does not have sufficient information to answer this question.

Question 39 Is special treatment of bio-fuels necessary, or can the emission factor and NCV of bio-fuel blends be satisfactorily determined using the above requirements for standard fuels?

Bio-fuels will play a major role not only in road traffic, but more and more so in aviation as well. One of the main goals for politicians and economic entities alike has to be to break free of the dependency on fossil fuels. A special treatment for biofuels would be favoured as it is political wanted scenario to replace parts of fossil fuels with bio-fuels (see also the 10% bio-fuel target for road vehicles). This support is needed to make bio-fuels a viable business alternative and support the move from older engines to newer ones. An additional gain could be the advances in technology research. It thus is preferable to develop special standards for biofuels to reflect the latest information showing their performance in terms of emissions to be better than expected.

Question 40 Would fuel suppliers be able to provide the percentage biogenic carbon content for blended fuels determined using international or national standards?

CLECAT has no fuel suppliers among its members, and thus is unable to answer this question. In principle international standards are preferable.

Question 41 Do you agree with the proposed methodology to account for measurement uncertainty in a given aircraft operator?

Not applicable, CLECAT does not represent aircraft operators.

Question 42 Is listing fuel metering uncertainties that apply to an entire aircraft operator appropriate? If not, why?

Not applicable, CLECAT does not represent aircraft operators.

Question 43 Will it be possible to demonstrate an aggregate uncertainty range for a range of fuel meters through the error propagation law? If not, why? If yes, how?

From a statistical point of view it is feasible, but CLECAT does not have the competence for this reply.

Question 44 Should it be allowed to carry out monitoring without uncertainty assessment in the two pre-trading years?

Yes, it may contribute to the assessment of the uncertainty assessment.

Question 45 Do the proposed annual emissions templates fit your purpose?

Not applicable to CLECAT members.

Question 46 Are there other parameters that should be covered in the annual emissions templates? If so, which?

Not to our knowledge.

Question 47 Can the proposed annual emissions templates be completed with your existing data records?

Not applicable to CLECAT members.

Question 48 Is there a need to link annual emissions templates to special software/databases? If yes, which ones?

It is logical that the templates are compatible with the software and databases already used in daily commercial traffic.

3.3 Verification

Completeness

Question 45 Will the existing records of the aircraft operators, cross-checked with Eurocontrol data be enough to ensure completeness of flight and emission data?

Yes, the information will be sufficient.

Question 46 Will the use of the ICAO designator ensure that emissions data is not duplicated for aircrafts operated by different operators? If not, how could it be ensured that all flights within the EU ETS are taken into account for MRV by exactly one operator?

Yes, we believe this information is sufficient.

Question 47 Will additional checks be required to ensure completeness?

This should be ascertained through a trial period.

Materiality

Question 48 Do you agree with the proposed materiality levels?

Not applicable to CLECAT members.

Question 49 Do you think additional guidance should be provided to verifiers outlining a recommended data sampling procedure, such as one which would consider the appropriate temporal and spatial data representation? Or should verifiers be allowed to apply their own professional judgement as part of verification?

A recommended uniform data sampling procedure would be preferable.

Question 50 Do you think that the proposed templates for the monitoring plan and annual reporting will help reduce the verification risk? Please explain.

CLECAT is not able to answer this question.

Accreditation

Question 51 What are in your view the specific competencies needed by a verifier active in the aviation sector additional to competencies for verifiers of stationary installations?

In addition to the skill of verifiers for stationary installation, the verifier needs to have thorough knowledge of airline operations.

Question 52 Regarding extra-EU operators or EU operators who operate outside the EU, where will verification best take place in order to be cost efficient while still ensuring a reasonable level of assurance?

Verification should take place at the site, where operators have their main business/headquarter or where they select to make data available.

Question 53 If verification needs to take place outside the EU or outside the MS where an aircraft operator has been assigned, which of these would be the most suitable approach: 1) Each operator is verified by a verifier accredited in the country where it has been assigned; 2)

there is a minimum requirement that the verifier acts under the accreditation of an EU accreditation body?

We would prefer option 2 to ensure quality standards and a certain amount of security.

4 Other issues / additional comments

Are there any other issues related to Monitoring, Reporting and Verification for Aviation that you would like to raise? Please be brief and specific

Thank you for taking the time to reply to this questionnaire.