



DIRECTORS GENERAL OF CIVIL AVIATION-MIDDLE EAST REGION

First Meeting (DGCA-MID/1) (Abu Dhabi, UAE, 22-24 March 2011)

Agenda Item 7: Environment

THE POSITION OF THE KINGDOM OF SAUDI ARABIA CONCERNING THE ENVIRONMENT IN THE FIELD OF CIVIL AVIATION

(Presented by Saudi Arabia)

SUMMARY

Dealing with green house gas emissions resulting from international civil aviation undoubtedly requires a universal approach to be carried out by ICAO, especially in the period following the expiry of Kyoto Protocol in 2012. However such a universal approach should not ignore the interests of developing countries, or place unreasonable financial or economic burdens on these countries. These countries are not historically responsible for climate change in the first place as the main responsibility lies on the shoulders of the advanced industrialized countries. Therefore, any universal approach should take into consideration the Common but Differentiated Responsibilities (CBDR) principle, and the countries' abilities and capabilities. It should also be consensual, just and non-discriminatory.

Action by the meeting is at paragraph 5.

1. INTRODUCTION

1.1 The Kingdom of Saudi Arabia has always been careful to tackle the issue of the impact of aviation on climate change. It has effectively participated in related international and regional conferences including the Group on International Aviation and Climate Change (GIACC) meetings under the auspices of ICAO Council. The outcome of these meetings has paved the way for the High Level Meeting on Environment (HLM-ENV) held between 7 - 9 October 2009 at ICAO in Montreal, and the conference laid the foundation for ICAO's position at the 15th Conference of Parties (COP 15) of the United Nations Framework Convention on Climate Change (UNFCCC) at Copenhagen, Denmark. The Kingdom of Saudi Arabia, in all international circles, has always sought to strike a balance between the growth of air transport and the impact of aviation on climate change, particularly when it benefits the interests of developing countries and developing air transport therein.

2. DETAILS

2.1 It must be stressed that the mandate for reducing emissions from international aviation originates from Article 2.2 of the Kyoto Protocol, which specifically places the obligation on industrial countries and not developing countries. Hence, any goals agreed in that regard must respect this fact which is further emphasized in the principle of common but differentiated responsibility.

2.2 This was carefully considered in the work of GIACC and the report of the high level meeting on aviation and climate change. The deliberations and outcome that followed in the preparation of the General Assembly resolution 37-19 did not follow the same boundaries and included some goals that are unattainable without adverse impacts on developing countries.

2.3 Achieving carbon balance by 2020, compared to 2005 levels, without identifying the responsibilities emerging from historical contributions to climate change, could necessitate obliging developing countries to reduce emissions resulting from air transport by approximately twice the growth witnessed in the air transport industry in these countries. This is impossible to achieve by simply improving operations, technologically developing aircrafts, or controlling air traffic without increased economic burdens. This will undoubtedly oblige developing countries to purchase carbon units resulting from the measures based on market mechanisms, and what that involves in terms of economic burdens.

2.4 These measures are expected to serve the interests of industrialized countries to a larger extent as the air transport industry in these countries has reached equilibrium, hence they will no longer have to bear the burden of any notable growth. It will be easy for these countries to achieve this goal through their modern fleets compared to the out-dated fleets of the developing countries. Furthermore, trading in carbon units will largely benefit advanced countries as they will be the owners of tradable carbon units due to their highly developed fleets, and income from this trade will contribute to the development and improvement of their own industry at the expense of the developing countries.

2.5 Moreover, reducing the carbon emissions of international civil aviation to this extent is almost impossible to realize by developing countries without resorting to alternative fuel, this would turn developing countries into importers of such fuel. This will benefit some industrialized countries that possess financial and scientific resources to develop this fuel, with the additional possibility of applying legal obligation that would provide economic feasibility for investment in this domain. Undoubtedly, relying on alternative fuel would create an economic burden on developed countries and hence the growth of air transport therein.

3. THE POSITION OF THE KINGDOM OF SAUDI ARABIA

3.1 We would like to reconfirm the position of the Kingdom of Saudi Arabia toward the issue of environment. We realize the necessity to tackle the issue of the impact of international aviation on climate change on an international scale through ICAO. However any action should take into account the interests of developing countries and should not impose additional burdens on them as a result of dealing with issues they are not historically responsible for compared to the responsibility of advanced industrialized countries. Implementing individual measures, by countries or regions, with an impact that encroaches on the interests of other countries, should not be encouraged without consensual agreement. It is also important to emphasize the CBDR principle, countries' abilities and capabilities, and non-discrimination against the civil aviation industry compared to other means of transport.

3.2 The Kingdom of Saudi Arabia also supports providing assistance to developing countries in the fields of building capabilities, transferring technology, and adjusting to environmental effects in order to support cooperative efforts exerted by ICAO and the countries collectively.

3.3 In light of the Kingdom's objectives mentioned above, Saudi Arabia expresses its reservations on articles 6,12,14,15 and 16 of the resolution by the General Assembly no. 19-37 issued during the 37th session held in September-October 2010.

4. RECOMMENDATIONS

4.1 In order to achieve progress in this field, the Kingdom of Saudi Arabia presents the following suggestions to tackle the issue of civil aviation emissions:

- a. Creating a high-level work team composed of countries participating in this conference, ICAO's General Assembly, and organizations representing the civil aviation industry in order to reach an **International Document** that addresses all issues pertaining to aviation fuel emission and methods for supporting developing countries, and which is open to discussion with other parties.
- b. Inviting the High Level Team to conduct Negotiations with all parties to **achieve some operational and technical solutions** aimed at avoiding, as much as possible, the imposition of fees and taxes, or to prevent increased emissions beyond the allowances which may need to be agreed upon; for example reducing aircraft waiting time in the air and on the ground, demanding better air traffic control measures, shorter air paths, etc.
- c. Inviting the High Level Team to Study innovative financial resource ideas to cover the costs of adjustment measures, transferring technology, etc., without imposing fees or taxes on carrying or consuming aircraft fuel.
- d. Reconfirming that the most important methods of reducing international aviation emissions are those reached by the GIACC meeting and HLM-ENV. These involve **improving fuel consumption efficiency** through operational measures that would, in the long term, take aviation to the growth phase without increasing carbon dioxide emission by 2050, supported by ICAO in this domain.
- e. **To seek the avoidance of making amendments to the Convention on International Civil Aviation (CICA) known as Chicago Convention** which would encumber the economy of developing countries with additional unaffordable financial burdens.

5. ACTION BY THE MEETING

5.1 The meeting is invited to:

- a) note Saudi Arabia's position as presented in this paper; and
- b) to adopt the recommendations proposed by the Saudi Arabia as presented in this paper in this regard.

-END-