

**60th CONFERENCE OF
DIRECTORS GENERAL OF CIVIL AVIATION
ASIA AND PACIFIC REGIONS**

*Sendai, Japan
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AGENDA ITEM 7: AVIATION AND ENVIRONMENT

**AIR TRANSPORT INDUSTRY'S VIEWS ON CRITICAL
ACTIONS TO ENSURE ROBUST IMPLEMENTATION OF
CORSIA**

(Presented by International Air Transport Association (IATA) and the Association of
Asia Pacific Airlines (AAPA), Supported by Japan, Malaysia, Papua New Guinea,
Singapore and Vietnam)

SUMMARY

Aeroplane operators' offsetting obligations under CORSIA have kicked off since 2024. For its first phase, from 2024 to 2026, CORSIA is estimated to mitigate around 140 million metric tons of CO₂. Joint action from States, including in the Asia Pacific region, is integral to ensuring the successful implementation of CORSIA. The Conference is invited to:

- a. Urge more States in the Asia Pacific region to join CORSIA in its voluntary phase to enhance its coverage of international aviation emissions;
- b. Recommend that States in the Asia Pacific region take prompt action to issue the necessary Letters of Authorization to upscale CORSIA Eligible Emissions Units supply and facilitate aeroplane operators' compliance;
- c. Reiterate the importance of (1) maintaining the exclusivity of CORSIA as the only global MBM for international aviation emissions, and (2) following ICAO's Policies on Taxation in the Field of International Air Transport (Doc 8632), calling for States and other UN agencies to refrain from introducing national/regional/international patchwork to address international aviation emissions.
- d. Urge States in the Asia Pacific region to implement CORSIA in a unified way as per CORSIA SARPs (Volume IV, Annex 16, of the Chicago Convention).

AIR TRANSPORT INDUSTRY’S VIEWS ON CRITICAL ACTIONS TO ENSURE ROBUST IMPLEMENTATION OF CORSIA

1. INTRODUCTION

1.1 CORSIA is an essential element within the basket of measures for international aviation to achieve the long-term global aspirational goal for international aviation (LTAG) of net-zero carbon emissions by 2050.¹ To date, the scheme is underpinned by the strong support from governments across the world and the international air transport industry.

1.2 The operators’ offsetting obligations under CORSIA have kicked off since 2024. To comply with CORSIA, aeroplane operators must procure and cancel CORSIA EEUs against their offsetting requirements accumulated across every 3-year compliance period. While the factors affecting the demand for CORSIA EEUs have been well defined, aeroplane operators continue to face a shortage of the supply of CORSIA EEUs, primarily due to host countries’ delay in issuing the Letters of Authorisation (LoAs)/Attestation Statements. LoAs remain an important requirement of CORSIA’s Emissions Unit Criteria (EUC), to avoid the risk of double-claiming emissions reductions.

1.3 While awaiting a sufficient supply of CORSIA EEUs to be unlocked to enable aeroplane operators to comply with the expected demand during the scheme’s first phase (2024-2026), there is also a need to protect CORSIA’s exclusivity to avoid a potential patchwork of duplicative State or regional market-based measures (MBMs) and ensure that international aviation CO₂ emissions are accounted for only once.

2. DISCUSSION

INCREASING CORSIA’S DECARBONIZATION POTENTIAL

2.1 As CORSIA is a route-based mechanism, more States participating in CORSIA implies higher coverage of the international aviation emissions under the scheme. Figure 1 illustrates the number of historical (solid bar) and the number of minimum projected (dashed bar) participation of States in CORSIA from 2021, along with their implications on the proportion of international aviation emissions covered under the scheme (line).

2.2 The growing commitment of States to CORSIA is evident, with the number of volunteering States increasing from 88 in 2021 to 129 in 2025. Between 2021 and 2023, about 60% of international aviation emissions occurred on routes between two States participating in CORSIA.² CORSIA is projected to cover, at least, over 85% of international aviation emissions from 2027 onwards.

2.3 This projection takes into account that States whose individual share of international aviation activities in Revenue Tonne Kilometres (RTKs) in the year 2018 is higher than 0.5 per cent of total RTKs are required to join CORSIA from 2027, as established in Assembly Resolution A41-22. It is important to note that earlier participation of the States with high international traffic volumes in 2026 could significantly impact CORSIA’s coverage in that year. Volunteering from other States not currently participating in CORSIA is also expected to increase CORSIA’s coverage.

¹ ICAO Assembly [Resolution A41-21](#); and ICAO Assembly [Resolution A41-22](#)

² According to data from the CORSIA Central Registry

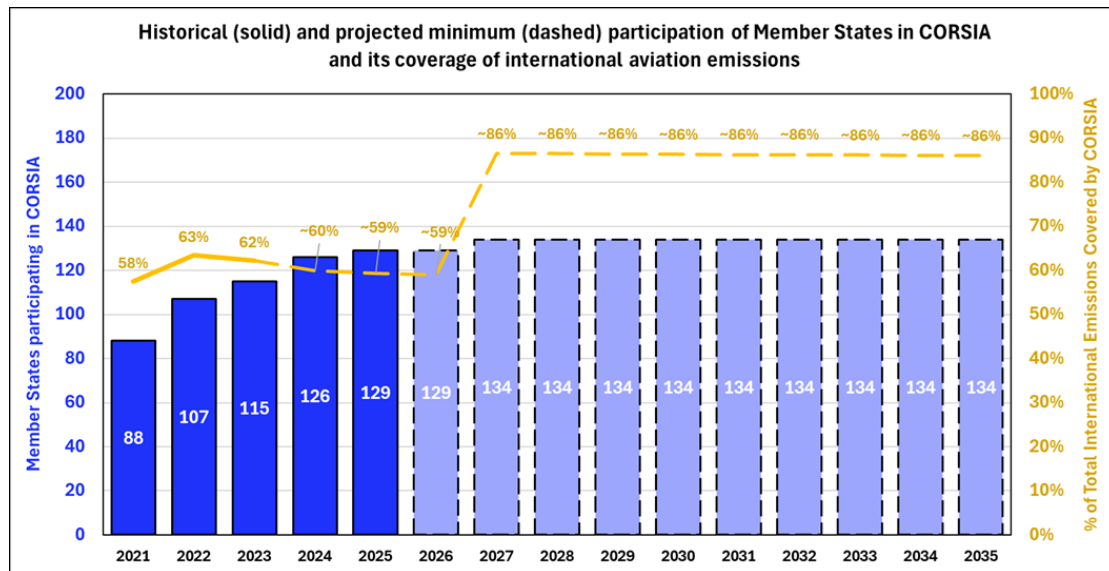


Figure 1: Historical and projected minimum participation of ICAO Member States in CORSIA and its corresponding coverage of international aviation emissions (Sources: Versions of the [ICAO document – CORSIA States for Chapter 3 State Pairs](#), [CORSIA Central Registry](#), and [IATA Sustainability & Economics](#))

2.4 This further underlines CORSIA's growing potential to contribute to the international aviation sector's decarbonization, which would be augmented through increased participation of Member States in the scheme's voluntary phase and beyond, along with its strong implementation according to the CORSIA SARPs (Volume IV, Annex 16, of the Chicago Convention).

ENSURING SUFFICIENT SUPPLY OF CORSIA EEUs WHILE ALIGNING WITH THE REQUIREMENTS OF THE PARIS AGREEMENT

2.5 The CORSIA Emissions Unit Eligibility Criteria define the elements and measures that must be in place to ensure the units have social and environmental integrity, guarantee that CORSIA EEUs deliver the desired CO₂ emissions reductions, and that no double-counting of their associated emissions reductions occurs. Mitigating the risk of double claiming requires prompt action from the host countries to implement the institutional arrangements that ensure the timely issuance of Letters of Authorization (LoAs)/Attestation Statements.

2.6 Important decisions regarding the operationalization of Article 6 of the Paris Agreement were achieved at UNFCCC COP29, facilitating the implementation of CORSIA. Particularly, finalization of the rules in Article 6.2, which provide essential guidance on the process and timing of authorization, its content, voluntary format, changes to authorization, transparency, including the requirement to state the conditions under which authorizations can be revoked, applications of first transfer, sequencing and timing of reporting, correcting inconsistencies, and interoperability of registries, among other elements. This development is a breakthrough in implementing Article 6 and CORSIA as it clarifies to host countries the steps needed to issue LoAs and apply corresponding adjustments toward CORSIA EEUs.

2.7 Despite increased clarity about these requirements, CORSIA EEUs with attestations or those that have already undergone corresponding adjustments are extremely limited in supply and are currently insufficient to meet the demand during the first phase. Therefore, it is essential that host countries take prompt action to issue the LoAs to upscale the supply of CORSIA EEUs in a timely manner, which would not only facilitate aeroplane operators' compliance but also ensure that the flexibility regarding the range of procurement strategies that they may employ is conserved, hence, minimizing any unnecessary burden on operators' finances.

STRENGTHENING CORSIA'S EXCLUSIVITY AND PROMOTING ITS UNIFIED IMPLEMENTATION

2.8 The ICAO Assembly established CORSIA as the “only global market-based measure applying to CO₂ emissions from international aviation so as to avoid a possible patchwork of duplicative State or regional MBMs, thus ensuring that international aviation CO₂ emissions should be accounted for only once.”³

2.9 The unified implementation of CORSIA by all Member States, without regional or national derogations, is crucial to uphold its exclusivity. The regional derogation in CORSIA's implementation is particularly worrisome. For example, the European Union (EU) fails to implement CORSIA for international flights between the European Economic Area (EEA)⁴ countries but rather implements its regional scheme, the EU Emissions Trading System (ETS), for those flights. The intra-EEA flights are international flights and should not be treated as domestic flights outside the scope of the Chicago Convention.⁵

2.10 There is also serious concern about the threat to CORSIA as the only global market-based mechanism for international aviation emissions. A number of countries have already implemented levies and carbon taxes on international air transport, which present a fragmented approach and are at odds with CORSIA's exclusivity. Furthermore, they contradict ICAO's Policies on Taxation (Doc 8632). The patchwork of MBMs is observed not only at the regional and national levels but also internationally, for example, the proposals by the Global Solidarity Levies Task Force (GSLTF), an alliance established at UNFCCC COP28 in 2023.⁶

2.11 In light of these concerning developments, it is crucial for ICAO Member States in the Asia Pacific region to reaffirm the agreement that CORSIA remains as the only global MBM for international aviation emissions, as it presents the fairest, non-distortive, cost-effective way to achieve effective CO₂ reductions through its unified implementation as per the Standards and Recommended Practices in Volume IV of Annex 16 to the Chicago Convention. For States in the Asia Pacific region to align behind CORSIA as the only global MBM for international aviation emissions, it will also be important to recognize the difference in readiness among States in the region. CORSIA takes this into account through the phased approach, and the region should continue the strong collaboration to support States in capacity building, for example through the ICAO ACT-CORSIA program.

3. ACTION BY THE CONFERENCE

3.1 The Conference is invited to:

- a) Urge more States in the Asia Pacific region to join CORSIA in its voluntary phase to enhance its coverage of international aviation emissions;
- b) Recommend that States in the Asia Pacific region take prompt action to issue the necessary Letters of Authorization to upscale CORSIA Eligible Emissions Units supply and facilitate aeroplane operators' compliance;
- c) Reiterate the importance of (1) maintaining the exclusivity of CORSIA as the only global MBM for international aviation emissions, and (2) following ICAO's Policies on Taxation in the Field of International Air Transport (Doc 8632), calling for States and other UN agencies to refrain from introducing national/regional/international patchwork to address international aviation emissions.

³ ICAO Assembly [Resolution A41-22](#)

⁴ 27 EU member states, Iceland, Liechtenstein, and Norway

⁵ Convention on International Civil Aviation (1944)

⁶ The impact of these fragmented levy-based proposals is discussed in detail in the separate discussion paper jointly presented by the Association of Asia Pacific Airlines (AAPA) and IATA.

- d) Urge States in the Asia Pacific region to implement CORSIA in a unified way as per CORSIA SARPs (Volume IV, Annex 16, of the Chicago Convention).

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