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CONSIDERATIONS ON THE PROPOSED EXPANSION OF THE EU ETS FOR AVIATION AND THE INTEGRITY OF CORSIA

(Presented by Türkiye)

EXECUTIVE SUMMARY

Türkiye reaffirms its full support for ICAO's environmental objectives and the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), and its appreciation of the European Union's climate ambition. This paper shares Türkiye's considerations regarding the proposed 2029 extension of the EU Emissions Trading System (EU ETS) for aviation, including possible overlapping obligations with CORSIA and implications for fair competition and air connectivity. It emphasizes constructive cooperation and the importance of preserving CORSIA as the single global market-based measure for international aviation.

1. INTRODUCTION

1.1 Türkiye attaches great importance to ICAO's environmental objectives, including the long-term global aspirational goal of net-zero carbon emissions from international aviation by 2050. Türkiye fully supports the ICAO framework, implements the applicable environmental Standards and Recommended Practices, and remains firmly committed to the effective implementation of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), including its monitoring, reporting and verification requirements.

1.2 Türkiye likewise highly appreciates the European Union's ambitious climate objectives and its valuable contribution to international efforts to decarbonize aviation, including its role in the development of CORSIA. As an EU candidate country, Türkiye continues to make sincere and sustained efforts throughout its accession process to advance alignment with the relevant EU acquis, while pursuing its own measures to promote sustainable aviation.

2. DISCUSSION

2.1 Türkiye has taken note of the European Commission's legislative proposal of 17 July 2026 (COM(2026) 616 final), which envisages extending the EU ETS from 2029 to flights departing from the

European Economic Area (EEA) to certain third-country destinations within 5,000 km of Frankfurt. While recognizing the environmental objectives underlying the proposal, Türkiye respectfully wishes to draw attention to its potential implications for the globally agreed ICAO framework.

2.2 ICAO Assembly Resolution A42-22 reaffirms CORSIA as the only global market-based measure applying to CO₂ emissions from international aviation, intended to prevent a patchwork of duplicative national or regional measures. Türkiye strongly believes that the integrity and effectiveness of CORSIA are best served by its consistent implementation and continued support by all States, together with constructive engagement in ICAO's agreed review processes.

2.3 The concurrent application of the EU ETS and CORSIA to the same international flights could create overlapping compliance obligations, administrative complexity and additional costs. Türkiye takes note of the proposed provisions addressing CORSIA-related costs; nevertheless, their practical effectiveness in preventing double charging and avoiding unintended duplication would warrant careful consideration. A coherent approach developed through multilateral consultation would help maintain predictability for all operators.

2.4 Although the proposed EU ETS requirements would apply irrespective of an airline's nationality on the routes concerned, the resulting effects could differ according to network structures and access to decarbonization support mechanisms. Additional carbon costs may affect the competitive balance between Turkish and EU air carriers, particularly for connecting services. They may also have adverse implications for the international connectivity and hub functions of Istanbul Airport, as well as other Turkish airports, with possible repercussions for passenger flows, tourism and investment.

2.5 In this spirit, Türkiye would welcome continued constructive dialogue among ICAO, the European Union and affected States, with due regard to the findings of a transparent assessment of potential environmental, economic and connectivity impacts. Türkiye respectfully encourages consideration of approaches that avoid duplication, preserve fair and equitable conditions of competition and reinforce, rather than fragment, the global CORSIA framework.

3. CONCLUSION

3.1 Türkiye reiterates its steadfast commitment to ICAO's environmental goals and CORSIA, alongside its respect for the European Union's climate ambitions. In a spirit of partnership and mutual understanding, Türkiye encourages all States to sustain their support for CORSIA as the single global market-based measure for international aviation and to pursue cooperative solutions to the concerns identified above. The Conference is invited to note the information contained in this paper.

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