



WORKING PAPER

**SEVENTH WORLDWIDE AIR TRANSPORT CONFERENCE
(ATCONF/7)**

Montréal, HQ, 16 to 20 November 2026

**Agenda Item 3: Strengthening regulatory and institutional frameworks
3.4: Levies on international air transport**

**MAINTAINING REGULATORY COHERENCE TO SUPPORT
COMPETITION, CONNECTIVITY AND THE SUSTAINABLE
DEVELOPMENT OF INTERNATIONAL AVIATION**

(Presented by Qatar)

EXECUTIVE SUMMARY

Adopted by International Civil Aviation Organization (ICAO) Member States in 2016, the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) is the first and only global market-based measure for addressing CO₂ emissions from international aviation. With CORSIA entering mandatory Second Phase in 2027 and work towards ICAO's Long-Term Aspirational Goal (LTAG) gathering pace, the sector needs a stable, predictable and internationally coordinated regulatory environment.

Recent regional initiatives on aviation emissions, including the proposed revision of the European Union Emissions Trading System (EU ETS) published in July 2026, have renewed attention to the need for regulatory coherence. While States may choose different ways to pursue their environmental objectives, increasing differences between global and regional measures could have implications for competition, global connectivity and the long-term efforts of the aviation sector to reduce emissions.

The State of Qatar believes that approaches agreed through ICAO offer the most effective way to advance environmental objectives while protecting a level playing field, preserving global connectivity and giving the aviation sector the certainty needed for long-term investment.

Action: The conference is invited to

- a) recognize the importance of maintaining regulatory coherence and predictability in measures addressing international aviation emissions;
- b) reaffirm the value of globally coordinated approaches in supporting the achievement of ICAO environmental objectives, including the LTAG;
- c) encourage Member States to pursue coordinated approaches through ICAO and avoid unilateral or regional market-based measures that could fragment the regulation of international aviation; and
- d) request the Council, to examine the implications of divergent regulatory approaches to international aviation emissions for fair competition, market access and connectivity, and to consider guidance to support regulatory coherence.

*Strategic
Goal:*

This working paper relates to Strategic Goals: *The Economic Development of Air Transport Assures the Delivery of Economic Prosperity and Societal Well-Being for All and Aviation is Environmentally Sustainable*

<i>Financial implications:</i>	None
<i>References:</i>	ICAO statement on proposed EU ETS aviation scope expansion, 17 July 2026 Assembly Resolution A41-22 Annex 16 — <i>Environmental Protection</i> , Volume IV — <i>Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)</i> Convention on International Civil Aviation (Chicago, 1944), Preamble

1. INTRODUCTION

1.1 Since CORSIA was adopted in 2016, ICAO Member States have worked together to build a common global framework for addressing CO₂ emissions from international aviation. That framework reflects a shared commitment to environmental action while allowing international air transport to develop sustainably.

1.2 The sector is now at an important point in implementing both CORSIA and the LTAG. Progress will depend on major investment in newer aircraft, sustainable aviation fuels (SAF), lower carbon aviation fuels (LCAF), cleaner energy pathways and other measures that reduce emissions.

1.3 For States, airlines, airports, fuel suppliers and investors, these decisions require clear and predictable rules. Better coordination at the international level can provide that certainty and make environmental measures easier to implement across a global aviation network.

2. REGULATORY COHERENCE AND INTERNATIONAL AVIATION

2.1 Competition and a Level Playing Field

2.1.1 International aviation depends on fair competitive conditions for operators serving markets across different regions. Consistent rules support those conditions by limiting unnecessary complexity and giving operators a clearer basis for long-term planning.

2.1.2 When operators serving similar markets are subject to different or overlapping carbon requirements, their regulatory obligations can vary significantly. This may undermine the long-standing principle, recalled in the Preamble to the Chicago Convention that international air transport should develop on the basis of equality of opportunity. For example, operators competing for the same traffic between the same regions could face materially different obligations depending on the location of their hubs, rather than on the emissions their services produce.

2.1.3 Divergent requirements can also affect decisions on fleets, routes and fuel supply. Because these investments are made over many years, operators need rules that are stable, predictable and coordinated internationally.

2.1.4 Many international air services are operated under bilateral air services agreements that provide for a fair and equal opportunity for the designated carriers of both Parties to compete and, in many cases, for consultation before measures affecting the agreed services are introduced. Measures affecting the services of foreign carriers are therefore best developed through dialogue and agreement between the States concerned.

2.2 **Global Connectivity**

2.2.1 International air transport supports trade, tourism, economic development and links between communities. Hub airports and international airline networks connect markets, carry passengers and cargo across regions, and help sustain global economic activity.

2.2.2 A patchwork of regulatory requirements can make these networks less efficient and may weaken connectivity. The effect can be especially significant for international hubs that link several regions and support long-haul services.

2.2.3 Coherent international approaches can therefore help States meet environmental objectives without losing the connectivity benefits that support economic growth and sustainable development.

2.3 **Resilience of International Aviation and the Net-Zero Transition**

2.3.1 Reaching ICAO's LTAG will require sustained cooperation among States and industry, backed by substantial investment across the aviation value chain. Investors and operators will be better able to commit resources where the regulatory direction is clear and dependable.

2.3.2 CORSIA's mandatory Second Phase begins in 2027, marking a decisive stage for the framework agreed by ICAO Member States in 2016. Broader participation strengthens CORSIA's role as the only global market-based measure for addressing CO₂ emissions from international aviation and for supporting collective progress towards the LTAG.

2.3.3 Against this background, overlapping or duplicative carbon requirements could add complexity for States, operators and other stakeholders. Different policy approaches can support environmental goals, but poorly aligned frameworks make future obligations harder to anticipate and can weaken confidence in long-term investment decisions.

2.3.4 The consequences go beyond carbon offsetting. Delivering ICAO's Global Framework for SAF, LCAF and other cleaner aviation energy pathways will require sustained investment throughout the value chain. Such investment is more likely when policy signals are stable and internationally coordinated.

2.3.5 Operators are already adapting to carbon offsetting obligations, SAF-related measures, and the associated monitoring, reporting and verification requirements. If separate frameworks apply without sufficient alignment, administrative work and compliance costs will increase, potentially drawing resources away from practical decarbonization measures.

2.3.6 Connectivity may also be affected. Uneven compliance burdens can shape decisions on routes, capacity and investment, particularly for hub operations that connect regions and support global passenger and cargo flows.

2.3.7 For these reasons, the State of Qatar considers regulatory coherence and the avoidance of unnecessary fragmentation to be essential as States advance their environmental objectives. Cooperation through ICAO offers the best means of ensuring that these measures reduce emissions while safeguarding competition, connectivity and the long-term sustainability of international aviation.