



International Civil Aviation Organization

WORKING PAPER

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ASSEMBLY — 40TH SESSION

EXECUTIVE COMMITTEE

Agenda Item 15: Environmental Protection – General provisions, Aircraft Noise and Local Air Quality– Policy and Standardization

ICAO'S ENVIRONMENTAL STANDARDS AND POLICIES

(Presented by the International Air Transport Association)

EXECUTIVE SUMMARY

The International Air Transport Association (IATA) considers that global standards and policies ensure that aviation's impact on the environment is addressed in a coherent way and with a high degree of uniformity. IATA highlights the need for ICAO to continue to ensure the integrity and independence of the technical processes and criteria that may provide context for ICAO policy decisions and invites the Assembly to reiterate its support for the ICAO Balanced Approach. IATA expresses its concerns about the proliferation of environmental taxes, which do not address aviation's environmental impact in an effective manner.

Action: The Assembly is invited to:

- Reiterate that ICAO's environmental certification standards have been developed for certification purposes and are not designed to serve as a basis for operating restrictions or emissions levies;
- Note IATA's view that any decisions on certification limits for supersonic aircraft need to be data-driven and informed by analysis to ensure they are aligned with the CAEP Terms of Reference.
- Reiterate its support for the ICAO Balanced Approach and to urge States to adopt it when addressing noise problems at their airports;
- Reaffirm the previously agreed principles on the phase-out of subsonic jet aircraft which exceed the noise levels in Annex 16 Volume I and introduction of local noise-related operating restrictions;
- Note IATA's support for ICAO's policies which recognize that environmental levies should only be applied at airports experiencing a defined noise or LAQ problem and that, if introduced, they should be in the form of a charge rather than a tax and that the funds collected should be applied, in the first instance, to mitigating the environmental impact of aviation.

<i>Strategic Objectives:</i>	This working paper relates to Strategic Objective Environmental Protection
<i>Financial implications:</i>	Not applicable
<i>References:</i>	

¹ English, Arabic, Chinese, French, Russian and Spanish versions provided by IATA.

1. INTRODUCTION

1.1 ICAO plays a leading role in addressing aviation's impact on the environment. Global standards and policies ensure that aviation's impact on the environment is addressed in a coherent way and they guarantee a high degree of uniformity in regulations, standards and procedures. This is fundamental to ensure the safe, orderly and efficient functioning of today's air transport system, to the benefit of all stakeholders, including passengers and shippers.

1.2 ICAO environmental standards are an important means of securing technological improvements and creating regulatory predictability for airlines and other aircraft operators, which in turn benefits the people and businesses using their services. IATA, therefore, strongly welcomes the adoption by CAEP of recommendations on the non-volatile particulate matter mass and number standards for aircraft engines.

1.3 As recognized by the Assembly and CAEP, ICAO's environmental certification standards have been developed for certification purposes and are not designed to serve as a basis for operating restrictions or emissions levies. IATA therefore supports the wording proposed in paragraph 7 of Appendix B of the Draft Assembly Working Paper – *Consolidated Statement of Continuing ICAO Policies and Practices Related to Environmental Protection – General Provisions, Noise and Local Air Quality* (A40-WP/054).

2. NEW TECHNOLOGIES, INCLUDING SUPERSONIC

2.1 Continued progress in mitigating aviation's environmental impacts remains a top priority for IATA. It is our expectation that new technologies, including supersonic aircraft, should not compromise this progress. IATA also supports the principle that sonic boom from aircraft should not create an unacceptable situation for the public. However, recognizing that what may be acceptable ultimately is a policy decision, IATA urges ICAO to continue to ensure the integrity and independence of the technical processes and criteria that inform ICAO policy decisions made by the ICAO Council and Assembly.

2.2 IATA believes it is important to preserve the integrity of the existing standard-setting process, the technical nature of CAEP, and the CAEP Terms of Reference used to develop and make recommendations regarding environmental standards. Any decisions on certification limits for supersonic aircraft need to be data-driven and informed by analysis to ensure they are aligned with the CAEP Terms of Reference.

2.3 Attempts to translate concepts such as public acceptability or annoyance, which though important are highly subjective and influenced by local factors, into the CAEP Terms of Reference or CAEP recommendations for certification requirements would compromise its technical role and the objective bases for recommendations on certification standards, slowing down and undermining the standard-setting process. Accordingly, IATA supports ICAO's long-standing approach for separating technical and policy assessments.

3. ICAO POLICIES ON NOISE MANAGEMENT AND OPERATING RESTRICTIONS

3.1 IATA invites the Assembly to reiterate its support for the ICAO Balanced Approach and to urge States to adhere to it when assessing and addressing noise problems at their respective airports, as proposed in Appendix C of the Draft Assembly Working Paper – *Consolidated Statement of Continuing ICAO Policies and Practices Related to Environmental Protection – General Provisions, Noise and Local Air Quality* (A40-WP/054).

3.2 IATA would like to emphasize the importance of land-use planning as an element of the ICAO Balanced Approach. As land-use planning has a direct effect on the number of people affected by aircraft noise, proper land-use planning policies are critical to preserve the noise reductions achieved through the introduction of quieter aircraft. Therefore, we invite the Assembly to reaffirm that States are encouraged to apply policies to limit the encroachment of incompatible development into noise-sensitive areas, as proposed in Appendices F of the Draft Assembly Working Paper – *Consolidated Statement of Continuing ICAO Policies and Practices Related to Environmental Protection – General Provisions, Noise and Local Air Quality* (A40-WP/054).

3.3 We also invite the Assembly to reaffirm the previously agreed principles on the phase-out of subsonic jet aircraft which exceed the noise levels in Annex 16 Volume I and introduction of local noise-related operating restrictions, as proposed in Appendices D and E of the Draft Assembly Working Paper – *Consolidated Statement of Continuing ICAO Policies and Practices Related to Environmental Protection – General Provisions, Noise and Local Air Quality* (A40-WP/054).

3.4 The introduction of aircraft-specific operating restrictions can have a significant impact on airlines as they may prevent them from operating to an airport using the most appropriate aircraft for that specific market and thus meeting the demands of the people and businesses that rely on their services. As a result, an operating restriction may result in a suboptimal use of airport capacity, higher operating costs and potentially also additional emissions if the replacement aircraft is less fuel efficient than a more appropriate aircraft for the market and associated flight distance. Where operating restrictions aim at the withdrawal or phase-out of aircraft which are certified in accordance with ICAO's noise standards, they undermine the role of international standards in securing a high degree of uniformity and stability in regulations. Considering the international nature of air transport and the long lifespan of aircraft, airlines must have the assurance that aircraft certified in accordance with all applicable standards can be operated worldwide during their entire lifespan and without undue restrictions that hamper international air transport.

3.5 Night curfews limit the ability of airlines to schedule flights in an optimal manner and to facilitate connectivity for travellers. They worsen existing capacity constraints and may result in additional congestion particularly in the evening and early morning. Also, where night curfews do not provide for sufficient flexibility to allow delayed traffic to operate, airlines may have to divert flights to other airports or delay them to the following day. This causes serious inconvenience to travellers both on the diverted or delayed flights and on other flights consecutively affected by the disruption to the airlines' operations.

3.6 Furthermore, recent experience has shown that the failure to adhere to ICAO's policies related to local noise-related operating restrictions could penalize operators using the latest generation of aircraft and, therefore, undermine efforts to improve the noise situation at an airport. This may notably be the case if an operating restriction is not based on the noise performance of the aircraft, as determined by

the certification procedure conducted consistent with Annex 16, Volume I, but on undemonstrated assumptions of its noise performance.

4. ENVIRONMENT-RELATED LEVIES

4.1 In recent years, national governments and local authorities have increasingly targeted air transport as a source of revenue, asserting environmental concerns as a justification. Too often these levies have been introduced in the form of taxes and the revenues have not been applied to mitigating the environmental impact of aviation or, at best, only to marginal effect.

4.2 IATA is concerned by the proliferation of such taxes as they further increase the administrative and financial burden on the air transport system without addressing aviation's environmental impact in a cost-effective manner. In particular, the effectiveness of levies as an incentive for the introduction of cleaner and quieter aircraft is not demonstrated as fleet choices are primarily driven by market needs, the normal fleet renewal process and considerations such as capacity and fuel efficiency.

4.3 In reality, the main impact of taxes is to increase the overall cost of air transport to the passengers and shippers that rely on it and thus discourage its use. If traffic decreases, the economic opportunities that air transport provides are hampered, with impacts rippling out in the air transport supply chain and in sectors that are particularly dependent on aviation, notably tourism.

4.4 IATA therefore underlines the importance of applying ICAO's policies on Charges for Airports and Air Navigation Services (Doc 9082) and stresses that environmental levies should only be applied at airports experiencing a defined noise or LAQ problem and that, if introduced, they should be in the form of a charge rather than a tax and that the funds collected should be applied, in the first instance, to mitigating the environmental impact of aviation.

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