



WORKING PAPER

ASSEMBLY — 42ND SESSION

EXECUTIVE COMMITTEE

Agenda Item 17: Environmental Protection – Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)

CORSIA IMPLEMENTATION AS THE SOLE GLOBAL MARKET BASED MEASURE

(Presented by the African Civil Aviation Commission on behalf of 54 African States²)

EXECUTIVE SUMMARY

This paper presents the views on Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) as the only Global Market Based Measure (GMBM) for addressing carbon dioxide emissions from international aviation. It outlines the progress made by African States, identifies capacity and implementation challenges, and emphasizes the need for enhanced global cooperation. In addition, the paper highlights emerging concerns regarding the introduction of overlapping regional MBMs, which may compromise the environmental integrity, economic fairness, and cohesion of global climate action in international aviation.

Action: The Assembly is invited to:

- a. re-affirm CORSIA as the sole Global Market-Based Measure (MBM) under ICAO to address CO₂ emissions from international aviation;
- b. request that duplicative or unilateral MBMs, particularly those that risk double counting of CO₂ emissions be avoided and ensure that international aviation CO₂ emissions are accounted for only once;
- c. strengthen the support programs such as Assistance, Capacity-building and Training for CORSIA (ACT-CORSIA) and technical assistance efforts to developing States in need, industry and all relevant stakeholders;
- d. use the information contained in the paper to review and amend the International Civil Aviation Organization (ICAO) Assembly Resolution A41-22; and
- e. urge the Council to clearly define the CORSIA periodic review “methodology/mechanism” and the role of the CAEP technical periodic review.

<i>Strategic Goals:</i>	This working paper relates to the Strategic Goal – <i>Aviation is Environmentally Sustainable</i> .
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<i>Financial implications:</i>	Subject to budgetary allocation by ICAO
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¹ English and French versions provided by AFCAC

² Algeria, Angola, Benin, Botswana, Burkina Faso, Burundi, Cameroon, Cabo Verde, Central African Republic, Chad, Comoros, Congo, Côte d'Ivoire, Democratic Republic of Congo, Djibouti, Egypt, Equatorial Guinea, Eritrea, Eswatini, Ethiopia, Gabon, Gambia, Ghana, Guinea, Guinea-Bissau, Kenya, Lesotho, Liberia, Libya, Madagascar, Malawi, Mali, Mauritania, Mauritius, Morocco, Mozambique, Namibia, Niger, Nigeria, Rwanda, Sao Tome and Principe, Senegal, Seychelles, Sierra Leone, Somalia, South Africa, South Sudan, Sudan, United Republic of Tanzania, Togo, Tunisia, Uganda, Zambia and Zimbabwe.

<i>References:</i>	<ul style="list-style-type: none">• Doc 7300 Convention on International Civil Aviation• ICAO Assembly Resolution A41-21• ICAO Assembly Resolution A39-3• CORSIA States for Chapter 3 State Pairs 1st, 2nd, 3rd, 4th and 5th Editions• IATA Annual Review 2024• AFRAA Air Transport Report Quarter 3 of 2024
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1. INTRODUCTION

1.1. The preamble of the Chicago Convention recognizes the importance of international civil aviation in creating and preserving friendship among nations. At the 39th Session of the International Civil Aviation Organization (ICAO) Assembly, the international civil aviation community adopted the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) as the only global MBM to address CO₂ emissions from international aviation (Assembly Resolution A39-3).

1.2. Since the 39th Assembly, ICAO successfully developed Annex 16 Volume IV for CORSIA and the associated Environmental Technical Manual. In addition, various CORSIA implementation elements have been developed and made available to States and aeroplane operators to complement the three phases of CORSIA implementation (Pilot Phase 2021-2023, First Phase 2024-2026 and Second Phase 2027-2035).

1.3. Appropriately, the Council has conducted CORSIA Periodic reviews every three years and made necessary adjustments to the scheme to respond to the dynamic nature of international aviation.

2. DISCUSSION

2.1. CORSIA is currently in its first phase (2024-2026) of implementation. Since the beginning of the Pilot Phase (2021-2023), the number of participating States has steadily increased, as shown in the analysis of the published editions of the CORSIA States for Chapter 3 State Pairs. The table below illustrates these increases at both the Global and African level. The African countries that have volunteered to participate in CORSIA represent 50% of the 54 African States

Year (From 1 st January of the year)	Global	% Increase Globally	Africa	% Increase Africa versus Global
2020				
2021	88	Base	17	19 %
2022	107	6 %	20	18 %
2023	115	14 %	21	18 %
2024	126	25 %	25	20 %
2025	129	28 %	27	21 %

2.2. The annex of the ICAO Assembly Resolution A41-21, which outlines the guiding principles for the design and implementation of market-based measures (MBMs) for international aviation calls for MBMs to avoid duplication and ensure that international aviation CO₂ emissions are accounted for only once.

2.3. Most of African States “about 50% now” were encouraged to join the Pilot Phase and First Phase to experience implementation challenges and benefits before the mandatory phases commence. These States have received support through ICAO regional workshops, Assistance, Capacity-building and Training for CORSIA (ACT-CORSIA) assistance from various States, and capacity-building initiatives for CORSIA implementation. This highlights a commendable collaborative approach within the continent and at the global level, emphasizing the need for continued support throughout the CORSIA implementation phase, particularly; where it’s expected that “offsetting” would be applicable by the next years.

2.4. Despite the robust CORSIA framework, aeroplane operators are also subject to other regional market-based measures (MBMs). These regional MBMs impose additional Monitoring, Reporting, and Verification (MRV) requirements, as well as offsetting obligations directly on aeroplane operators. For African aeroplane operators, many of which operate in aviation markets that are still in the growth stage, these overlapping requirements create market distortions, increase administrative and economic burdens, and undermine the effectiveness of CORSIA and ICAO’s central role as envisioned in the Chicago Convention. The introduction of global solidarity levies for aviation could further exacerbate these challenges by imposing additional costs on aeroplane operators from developing regions, potentially slowing down their growth and competitiveness in the international market. Meanwhile; aeroplane operators from those regions that may apply its unilateral regional MBM’s are waived from CORSIA offsetting, if they fulfill that regional MBM only. This practice, if confirmed, may lead to unfair competitions between aeroplane operators from developing States and others.

2.5. The implementation of multiple regional MBMs requires aeroplane operators to invest in compliance mechanisms, staff training, updated reporting systems and contracting third party verifiers, all of which contribute to increased operational costs. This makes flying more expensive, introduces unfair competition and potentially push Africans toward less safe modes of transportation.

2.6. As a result of the existence of these regional MBMs, African airlines have incurred significant costs and additional administrative burdens as detailed in the table below:

MBM	African State/ Airline	Comments	Costs
EU ETS	Ethiopian Airlines Kenya Airways Egypt Air, Air Senegal SA	Costs of MRV Cost of Offsetting	
UK ETS	Ethiopian Airlines Kenya Airways Egypt Air	Costs of MRV Cost of Offsetting	
Global Solidarity Levy <i>Source: Global Solidarity Levy Task Force Interim Report of on November 2024</i>	Kenya (co-chair), Senegal, Sierra Leone, Zambia, Djibouti, Somalia, Togo (joined at COP29), The African Union (Observer)	Proposes an aviation ticket levy for a frequent flyer	Starting at USD 9 for a person’s second flight and rising to USD 177 for their twentieth within the same year

2.7. According to the 2024 African Airlines Association (AFRAA) annual report, Africa’s aviation accounted for only 2.1% share of the global traffic. This is however projected to grow by 4% annually from 2018-2050 according to **ICAO Long-Term Traffic Forecast**.

2.8. According to the International Air Transport Association (IATA), African airlines are projected to achieve a collective net post-tax profit of \$100 million in 2024, marking the second consecutive year of profitability following the COVID-19 crisis. However, this translates to a profit of just \$0.90 per passenger, significantly below the global average of \$6.14 per passenger. IATA notes³ that Africa, with 17% of the world's population, contributes approximately 2% of total global travel.

³ https://www.iata.org/en/pressroom/2024-releases/2024-07-02-02/?utm_source=chatgpt.com

2.9. Aviation sustainability is an imperative for the socio-economic development of Africa. The existence duplicative MBMs and levies affect the sustainability of aviation by increasing costs of operations and amounts to double offsetting of international aviation CO₂ emission.

3. CONCLUSION

3.1. The spirit of the ICAO Assembly Resolutions must be upheld to ensure that no more unilateral measures are imposed on States beyond what is agreed multilaterally at ICAO. African States and industry face many challenges such as infrastructure deficiencies, high operational costs, and limited connectivity, impacting their profitability and market share. While African States continue to actively participate in CORSIA and benefit from capacity-building efforts, concerns remain over its design and economic impact. The upcoming CORSIA reviews provide an opportunity to address these issues and enhance alignment with the Paris Agreement. More and clear definition for the CORSIA periodic review “methodology/mechanism” may be needed to be documented together with the role of the Committee on Aviation Environmental Protection (CAEP) technical periodic review.

3.2. African States reaffirm their commitment to CORSIA, adopted by ICAO as the only global MBM to address CO₂ emissions from international aviation. African States urge the Assembly to end all and any potential regional duplicative MBMs, Taxes/Levies and uphold ICAO’s leadership in aviation environmental sustainability.

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