

Dear Mr. Jan Pie,

Taking this opportunity, the Union of Aviation Industrialist of Russia presents its compliments to the President of the ICCAIA Chairman and would like to express our profound gratitude for the kind invitation to send our comments on the draft of the CORSIA support letter on behalf of the ATAG Group.

We regret to inform you, Mr. Jan Pie, that the Union of Aviation Industrialist of Russia cannot share the encouraging spirit of the letter in support of the CORSIA project implementation for a number of good reasons.

We are forced to note that the proposed scenario of the CORSIA implementation contradicts the interest of aviation industry. Just for the first 15 years of the CORSIA implementation the sector of international civil aviation will lose around 150 billion of US dollars just for the purchasing of emission credits on the open carbon markets outside the aviation industry sector. It should be emphasized that 39th Assembly session of ICAO in preambular paragraph 10 of the resolution A39-3 has reaffirmed “...*the concern with the use of international civil aviation as a potential source for the mobilization of revenue for climate finance to the other sectors, and that MBMs should ensure the fair treatment of the international aviation sector in relation to other sectors*”. Obviously, such financial losses will have direct and negative effect on investments into air fleets renewal and the aviation infrastructure modernization. Consequently, this technological development slowdown will stimulate an accelerated growth of CO₂ emissions of in the sector of civil aviation, and most important it will have an adverse impact on the overall global flight safety level.

The complexity, as well as main elements of the CORSIA scheme, as it described in the draft of Volume IV of Annex 16 to the Chicago Convention, contradicts most of provisions listed in the Annex to the ICAO Assembly resolution A39-2 (see attachment). We have no doubts that the proposed scenario of the CORSIA implementation will fail at the global level, that with high probability can trigger a number of regional economic conflicts. Obviously, it goes against the interests of the global aviation industry also.

There is no any scientific evidence that such hasty and ill-designed the CORSIA climate actions will meet the main global environmental goals. At the same time, we believe that the “Aviation Clean Development Mechanism”, proposed by the Russian Federation for the consideration of 39th ICAO Assembly session (see attached A39-WP/387), completely meets

letter and spirit of the Chicago Convention and the Paris Climate Agreement, as well as would be able to reconcile the principle of “non-discrimination” with the CBDR principle while completely meets the interest of all global aviation industry sectors.

I would like to express my sincere hope that you, Mr. Jan Pie, will inform other ICCAIA members on the opinion of the Union of Aviation Industrialist of Russia regarding the CORSIA project implementation.

Please, accept, your Mr. Jan Pie, the assurance of my highest consideration.

- Attachments:
1. Annex to the ICAO Assembly resolution A39-2 on 1 page.
 2. ICAO Assembly working paper A39-WP/387 on 7 pages.

Sincerely yours,

President
of the Union of Aviation Industrialists

Yuri KOPTEV