

**TABLE FOR COMMENTS**

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#	Para No./ Annex / Figure / Table	Line Number	Type of comment  ge = general  te = technical  ed = editorial	Comment  (including justification for change)	Proposed change  (including proposed text)	Assessment of comment  (to be completed by UNFCCC secretariat)
1	Panel Question a)		te	<p>As described in Paragraph 5.5: Installing the e-taxiing devices will increase the weight of the airplane, which would lead to slightly greater fuel consumption en route. The emissions due to added weight from engines en route should be considered as a leakage. ICAO is of the view that the methodology as proposed which measures the CO<sub>2</sub> emissions saved from the use of an e-taxi system and leakage of CO<sub>2</sub> due to the extra weight is appropriate.</p> <p>The scientific community has not yet reached consensus on the use of Radiative Forcing Index (RFI) or other such multipliers to quantify the non-CO<sub>2</sub> effects of aircraft emissions. Until the scientific community reaches a general agreement on this issue, ICAO strongly recommends that the methodology only consider CO<sub>2</sub> emissions from aviation.</p>		
2	Panel Question b)		te	<p>E-taxiing systems are used before take-off or after landing with electric motors powered by Auxiliary power units instead of requiring aeroplane's main engines. Their use offers CO<sub>2</sub> emissions savings from the start of operations. However, ICAO is not aware of any significant commercial use of the systems.</p>		

Template for comments

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3	Panel Question c)		te	<p>The two options as written, following further clarification with the UNFCCC, are as follows:</p> <ul style="list-style-type: none"> <li>• (Option 1) Flights of commercial airplanes operating between two airports of the host country are eligible to claim emission reductions using this methodology.</li> <li>• (Option 2) Operational cycles of commercial airplanes operating e-taxi systems at the host country are eligible to claim emission reductions using this methodology.</li> </ul> <p>It is understood that Option 1 intends to include domestic flights only, and the Option 2 allows to include: (a) any landing in the host country regardless of the origin and (b) any take-off regardless of the destination.</p> <p>Under the UNFCCC process and procedures (including both the Convention and the Kyoto Protocol) domestic and international aviation are treated differently. According to the current accounting rules, all Parties are to distinguish emissions from domestic aviation from those resulting from international aviation. The former are to be included as part of the national total greenhouse gas (GHG) emissions, while the latter are to be excluded from national totals and reported separately in Parties' GHG inventories.</p> <p>It is understood that international civil aviation is excluded from the CDM, however there are no restrictions for domestic aviation CDM projects. Therefore, ICAO is of the view that the methodology should only be applied to flights meeting the definition of Option 1, domestic aviation.</p>		

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