Transport for London



Via email to: corsiaconsultation@dft.gov.uk

Transport for London City Planning

5 Endeavour Square Westfield Avenue Stratford London E20 IJN

Phone 020 7222 5600 www.tfl.gov.uk

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Dear Sir / Madam,

Consultation on implementing the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)

I am writing on behalf of the Mayor of London in response to the consultation on implementation of CORSIA by the United Kingdom. The importance of tackling the climate crisis has never been clearer, and the commitment by both London and the UK to achieving net zero carbon emissions are central to that. Like other sectors, the aviation sector must play its part. Failing to do so will undermine efforts to reach net zero. CORSIA is a potentially useful step towards supporting the sector to reducing its emissions.

Aviation is inherently international in its nature and so we welcome an approach which seeks to weave together the different national and international emissions schemes – namely CORSIA, the EU emissions trading scheme and the UK emissions trading scheme. The consultation presents a number of options and whichever is pursued, the Government should ensure an environmentally ambitious approach which secures the inclusion of all flights to the greatest extent possible, while avoiding any oversupply of emissions credits which could reduce their price and undermine emissions reduction objectives. An effective regime requires effective compliance monitoring, enforcement and penalties. We welcome the provisions proposed, notwithstanding that key will be how they are applied in practice.

Nevertheless, it is also important to recognise the limitations of any carbon offsetting scheme. These efforts need to be part of a package of measures to encourage meaningful emissions reductions from the aviation sector.

Moreover, it is clear that the CORSIA scheme as it stands is not the destination so much as an intermediate stop. In its Sixth Carbon Budget, the Committee on Climate Change (CCC) has called for CORSIA to be strengthened if it is to be consistent with the Paris Agreement. We believe that the recommendation of the CCC for future international measures that incentivise greenhouse gas



removals for all emissions from aviation, not just emissions above a 2019 baseline, should be pursued. We urge the Government to take this forward, working with the International Civil Aviation Organisation (ICAO) and other international partners, and follow through on its stated intent to push for progress in emissions reductions from the aviation sector in its role presiding over the UN COP26 climate conference later this year.

The UK implementation of CORSIA is a welcome step, but it is only a first step if we are to meet our international obligations on carbon emissions and our duty to future generations.

Yours sincerely

Alex Williams

Director of City Planning
Email: alexwilliams@tfl.gov.uk
Direct line: 020 3054 7023

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