



Aviation industry plan to offset emissions is serious distraction from need to reduce emissions from the sector

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Aviation is one of only two sectors worldwide with no existing targets to reduce emissions. Under business-as-usual, aviation is projected to increase emissions by between 300-700 per cent by 2050. In September 2016, the International Civil Aviation Organization (ICAO) plans to adopt measures to achieve “carbon-neutral growth”¹ from 2020. To achieve this, the main proposal on the table is carbon offsetting. As countries involved in ICAO are consulted on this proposal, the undersigned organisations call on them to ensure that ICAO will adopt a serious plan to reduce emissions. Plans to offset the majority of the sector's growth in emissions are a significant distraction from real measures to reduce aviation emissions.

Greenhouse gas emissions from aviation almost doubled from 1990 to 2006, making global aviation the world's seventh largest polluter, disproportionately large given that it is caused by between 3-7 per cent of the world population². Against this backdrop, the proposal being elaborated by the **International Civil Aviation Organization (ICAO)** has been criticised for its lack of ambition.³

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ICAO's proposal to reduce the climate impact of aviation relies heavily on carbon offsetting. A position paper released by the "Global Aviation Industry" in 2013 states that "*The industry believes that a simple carbon offsetting scheme would be the quickest to implement, the easiest to administer and the most cost-efficient.*"⁴ Offsetting is widely considered a false solution because it does not lead to emission reductions but merely shift emissions from one sector to another and, at best, is a zero-sum game.⁵

So far, ICAO have elaborated a number of principles which carbon offsets would need to comply with, such as avoiding double counting, being calculated against a realistic baseline, be permanent and do no harm. However, experience from the Clean Development Mechanism (CDM) has deeply discredited the notion that offsets provide climate benefits. Offset projects have proved themselves, by and large, incapable of respecting the principles laid out by ICAO.

Fraudulent sales of carbon credits as investments have swindled many vulnerable pensioners out of their life savings.⁶ As a result of the experience with the CDM as well as controversies and scandals around carbon offset projects in the voluntary carbon markets, the world's largest offset market, the EU Emissions Trading System, has officially banned the use of offset credits to meet the EU emission targets post 2020.

This will no doubt lead to serious reputational issues since a significant number of offset projects, particularly from offsets that aim to 'Reduce Deforestation from Deforestation and Forest Degradation' (REDD+) face local opposition and are challenged over wrongly blaming peasant farming practises and forest use by indigenous peoples for deforestation while being silent about the real causes of large-scale forest destruction.

Forests and soils do not offset fossil fuel emissions

Land-based carbon offsets, such as from REDD+ type projects or from agriculture are particularly contentious, with greater risks for the climate.

By nature, REDD+ projects place restrictions on existing land use - that is how they generate the carbon savings sold as offset credit. Because the large majority of REDD+ projects (wrongly) blames deforestation on small-scale peasant farming, in particular where it involves shifting cultivation, such restrictions have a detrimental impact on peasant livelihoods and forest peoples' way of life. By contrast, REDD+ projects that tackle the real drivers of large-scale deforestation – extraction of oil, coal, mining, infrastructure, large-scale dams, industrial logging and international trade in agricultural commodities – are by and large absent.⁷

With the challenges of counting emissions reductions and distributing offset payments to multiple small-scale farmers, there is a risk that agricultural offsets would favour large-scale farmers or monoculture farming practices, creating one more driver of land dispossession of smallholder farmers, particularly in the Global South.

Offset credits from forest conservation, tree plantation or soil carbon sequestration carry the additional risk of becoming null and void when wildfires, storms or natural decay cause uncontrollable release of carbon stored in the trees, soils or other natural habitats. This is one of the reasons why the CDM excludes all offset categories related to forest or agriculture land use except for afforestation, reforestation and biomass energy projects. Even then, credits from these tree planting offset projects are sold as temporary carbon credits that need to be bought again in a matter of years because credits from tree planting projects cannot be considered to permanently store carbon.

In short, land-based offset credits are controversial, and experience from REDD+ has shown that certification standards or safeguards cannot prevent conflicts.⁸

We, the undersigned, call on the members of ICAO to ensure measures adopted at the 39th ICAO meeting will make an adequate and fair contribution to the global effort to limit global warming to well-below 2 degrees Celsius. Any measure adopted at the 39th ICAO meeting must make a serious proposal to reduce emissions. It must also exclude land based offset credits, such as REDD+ type projects for the reasons given in this letter.

1 To achieve carbon neutral growth, ICAO proposes to improve the fuel efficiency of the aviation fleet worldwide by an average 1.5 percent per annum (a goal already being exceeded); to stabilize net aviation CO2 emissions at 2020 levels through so-called "carbon-neutral growth"; and to halve net CO2 emissions from the industry by 2050, compared with 2005. For detail, see <http://www.icao.int/environmental-protection/Pages/market-based-measures.aspx>

2 Carbon Market Watch/Nature Code (2013): International Aviation. Addressing emissions while respecting equity issues. Bread for the World. http://www.brot-fuer-die-welt.de/fileadmin/mediapool/2_Downloads/Fachinformationen/Aktuell/Facts_36_international_aviation.pdf

3 Airplane CO2 standard too weak, MEPs tell industry. 25.02.2016 <http://www.transportenvironment.org/news/airplane-co2-standard-too-weak-meps-tell-industry>; European NGO Comments on the ICAO Global MBM Process. 2013. <http://carbonmarketwatch.org/wp-content/uploads/2013/07/EU-NGOs-on-ICAO-MBM-Process.pdf>

4 <https://www.iata.org/policy/environment/Documents/atag-paper-on-cng2020-july2013.pdf>

5 See for example, World Rainforest Movement (2015): REDD: A Collection of Conflicts, Contradictions and Lies. http://wrm.org.uy/wp-content/uploads/2014/12/REDD-A-Collection-of-Conflict_Contradictions_Lies_expanded.pdf

6 REDD-Monitor (2016). Another 19 credit boiler room scams bite the dust. 16 Februar 2016. <http://www.redd-monitor.org/2016/02/11/another-19-carbon-credit-boiler-room-scams-bite-the-dust-including-not-before-time-carbon-neutral-investments/>

7 See for example, GRAIN (2015): How REDD+ projects undermine peasant farming and real solutions to climate change. <http://wrm.org.uy/browse-by-subject/mercantilization-of-nature/redd/>

8 See, for example, the large number of blog posts on the REDD-Monitor website, www.redd-monitor.org