

A call to action: Ensuring CORSIA's robust implementation

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Introduction

CORSIA is an essential element within the basket of measures for international aviation to achieve the long-term global aspirational goal for international aviation (LTAG) of net-zero carbon emissions by 2050.¹ As of today, CORSIA is the only global market-based measure (MBM) that applies to an entire transport sector. To date, the scheme is underpinned by the strong support from governments across the world and the international air transport industry.

While aeroplane operators have been complying with the monitoring, reporting, and verification (MRV) requirements of CORSIA since 2019, 2024 is likely to mark the first year when operators' offsetting obligation kicks in. For the offsetting part, aircraft operators are required to procure and cancel CORSIA Eligible Emissions Units (EEUs) against their offsetting requirements in every 3-year compliance period (for example, from 2024 to 2026, and then 2027 to 2029, and so on).

While the factors affecting the demand for CORSIA EEUs have been well defined, airlines are continuing to face a shortage in their supply. On the positive side, the conclusion of operational rules of Article 6 of the Paris Agreement at the United Nations Framework Convention on Climate Change's (UNFCCC) 29th Conference of the Parties (COP 29) at Baku in November 2024 provides more certainty to unlock the supply of CORSIA EEUs. However, the various factors that would individually or jointly present

challenges for CORSIA's robust implementation cannot be ignored. Those factors include, but are not limited to, the duplicative market-based measures imposed by regions and countries, the complex and often fragmented landscape of international environmental policies concerning aviation, and the delay in the issuance of letters of authorization/national attestations from host countries towards CORSIA EEUs.

CORSIA is at an important turning point, and its success demands collaborative efforts between different UN agencies, governments, the industry, and carbon market stakeholders to find practical solutions to overcome these challenges, which are discussed further in the following sections.

Increasing CORSIA's decarbonization potential

As CORSIA is a route-based mechanism, more States participating in CORSIA implies higher coverage of the international aviation emissions under the scheme. Figure 1 illustrates the number of historical (solid bar) and the number of minimum projected (dashed bar) participation of States in CORSIA from 2021, along with their implications on the proportion of international aviation emissions covered under the scheme (line).

The growing commitment of States to CORSIA is evident, with the number of volunteering States increasing from

1 Resolution A41-21: Consolidated statement of continuing ICAO policies and practices related to environmental protection — Climate change; and Resolution A41-22: Consolidated statement of continuing ICAO policies and practices related to environmental protection — Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)

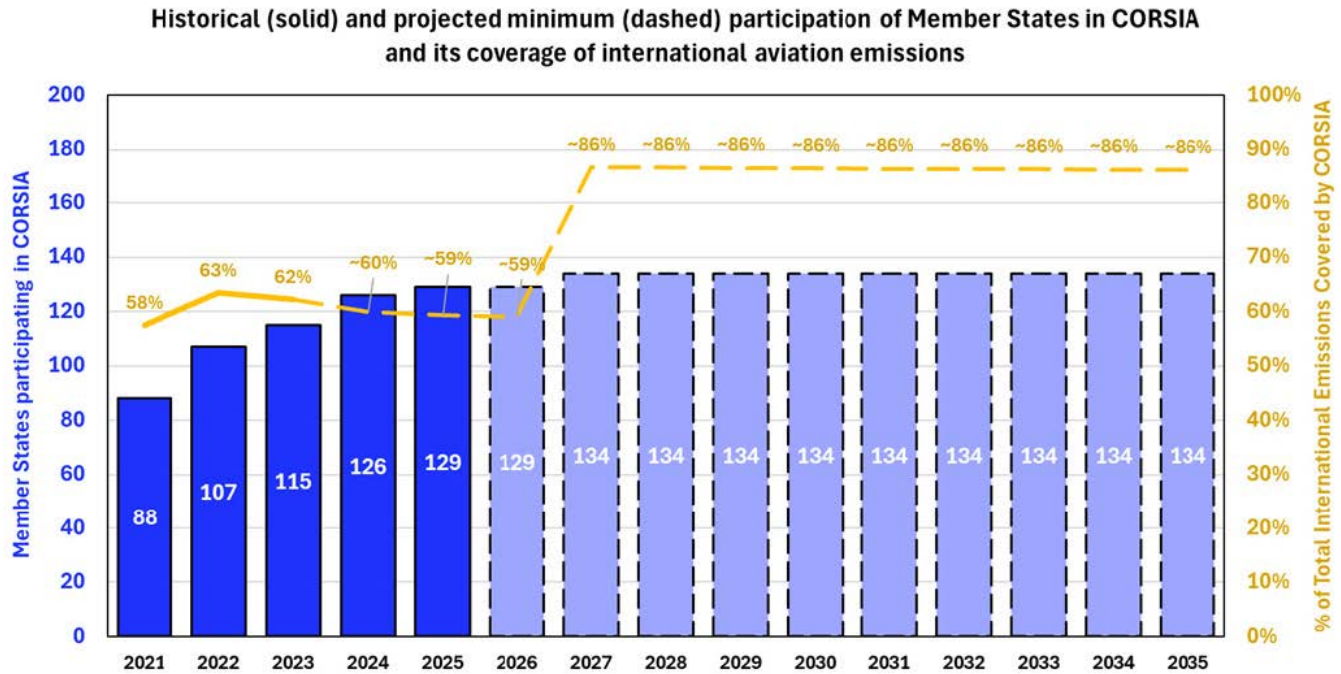


FIGURE 1: Historical and projected minimum participation of ICAO Member States in CORSIA and its corresponding coverage of international aviation emissions (Sources: Versions of the ICAO document – CORSIA States for Chapter 3 State Pairs, CORSIA Central Registry, and IATA Sustainability & Economics)

81 in 2021 to 129 in 2025.² Between 2021 and 2023, about 60% of international aviation emissions occurred on routes between two States participating in CORSIA.³ CORSIA is projected to cover, at least, over 85% of international aviation emissions from 2027 onwards.

This projection takes into account that States whose individual share of international aviation activities in the Revenue Tonne Kilometres (RTKs) in the year 2018 is higher than 0.5 per cent of total RTKs are required to join CORSIA from 2027, as established in Assembly Resolution A41-22. It is important to note that earlier participation of the States with high international traffic volumes, such as Brazil, China, India, the Russian Federation, and Viet Nam, in 2026 could significantly impact CORSIA's coverage in that year. Volunteering from other States not currently participating in CORSIA is also expected to increase CORSIA's coverage. This further underlines CORSIA's growing potential to contribute to the international aviation sector's decarbonization and the need to ensure its strong implementation.

Continuous effort to strengthen CORSIA's environmental integrity

To ensure the environmental integrity of CORSIA, the ICAO Council awards eligibility to programs that can issue CORSIA EEUs based on a set of eligibility criteria. CORSIA Emissions Unit Eligibility Criteria define the elements and measures that must be in place to ensure the units have social and environmental integrity, guarantee that CORSIA EEUs deliver the desired CO₂ emissions reductions, and that no double-counting of their associated emissions reductions occurs.

Double claiming could occur when the emissions units used by aircraft operators in CORSIA are also claimed by another party, such as the host country seeking to meet its nationally determined contributions (NDCs) under the Paris Agreement. To address this issue, ICAO requires eligible programs to obtain a host country attestation to avoid double claiming, a key measure defined in the CORSIA eligibility criteria, and make it publicly available

² Versions of the ICAO document – CORSIA States for Chapter 3 State Pairs, CORSIA Central Registry

³ According to data from the CORSIA Central Registry

before operators can use the associated CORSIA EEU. Essentially, the national attestations demonstrate that the host countries will refrain from using reductions associated with CORSIA EEUs for their NDCs compliance. This is a welcome approach to minimizing the risk of double claiming.

Accelerated implementation of Article 6 of the Paris Agreement is key

Mitigating the risk of double claiming requires prompt action from the host countries to implement the institutional arrangements that ensure the timely issuance of the national attestations (also known as host country authorization).

In this context, it is important to note that under the UNFCCC process, countries have adopted provisions under Article 6 of the Paris Agreement. Following decade-long negotiations, agreement on open items in Articles 6.2 and 6.4 was achieved at UNFCCC COP 29, resulting in the finalization of the rules in Article 6.2 that provides essential guidance on the process and timing of authorization, its content, voluntary format, changes to authorization, transparency, including the requirement to state the conditions under which authorizations can be revoked, applications of first transfer, sequencing and timing of reporting, correcting inconsistencies, and interoperability of registries, among other elements. This development is a breakthrough in implementing Article 6 and CORSIA as it clarifies to host countries the steps needed to issue letters/statements of authorization (essentially, the national attestations, in ICAO language) and apply corresponding adjustments toward CORSIA EEUs. This is expected to increase certainty for project developers and, consequently, the supply of CORSIA EEUs.

Progress in unlocking and upscaling CORSIA EEUs

In February 2024, the first batch of CORSIA EEUs for airlines' compliance under the scheme was made available through the Architecture for REDD+ Transaction (ART)

program for a jurisdictional project based in Guyana. This was followed by the Guyana government's announcement that the associated emission reductions had undergone corresponding adjustment, authorized, and reported to the UNFCCC.

With more programs being approved by the ICAO Council towards the end of 2024, the industry is hopeful that this will lead to an increased timely supply of CORSIA EEUs with the necessary national attestations.

Avoiding a patchwork of market-based measures and pushing for the unified implementation of CORSIA

The ICAO Assembly established CORSIA as the “only global market-based measure applying to CO₂ emissions from international aviation so as to avoid a possible patchwork of duplicative State or regional MBMs, thus ensuring that international aviation CO₂ emissions should be accounted for only once.”⁴

Despite this, certain States and regions have established MBMs that also apply to international aviation CO₂ emissions. For example, since 2012, the European Union has implemented its Emission Trading System (EU ETS), a cap-and-trade mechanism, on international routes between European Member States, which also falls within the scope of CORSIA. Furthermore, some countries have already implemented levies on air transport aimed at either achieving an environmental benefit or raising funds to decarbonize other industries, double-charging international aviation emissions.

Apart from complicating operators' compliance requirements, such duplicative efforts also differ from CORSIA's approach as an offsetting mechanism that guarantees robust CO₂ reductions. For some operators, they imply double charging the same tonnes of CO₂ emissions under two different MBMs. It is also worth noting that countries that have implemented such duplicative efforts are also Member States of ICAO and were instrumental in developing and establishing CORSIA.

4 Resolution A41-22: Consolidated statement of continuing ICAO policies and practices related to environmental protection — Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)

The patchwork of MBMs is observed not only at the regional and national levels but also internationally. The governments of France, Barbados, and Kenya led the Global Solidarity Levies Task Force (GSLTF), established at COP 28 in 2023, to examine innovative sources of climate finance. In its recent public consultation in February 2025, the GSLTF proposed various options for these innovative sources of climate finance. Aviation was identified as one of the targeted sectors for this climate finance.⁵ As the United Nations does not apply taxes on businesses or individuals, such measures are more likely to be implemented by individual States.

It is important for the GSLTF and the UN agencies to respect the deliberations and decisions of the States under the auspices of ICAO, which has the prerogative to manage international aviation emissions. The ICAO Member States decided that CORSIA presents the fairest, non-distortive, cost-effective way to achieve effective CO₂ reductions through its unified implementation as per the Standards and Recommended Practices in Volume IV of Annex 16 to the Convention on International Civil Aviation. This approach would also reduce the regulatory and compliance burden and limit any adverse impacts on developing countries' trade and tourism.

Conclusion

The strong commitment from ICAO Member States so far to CORSIA is also reflected on the air transport industry's side, with 670 operators from 131 Member States successfully complying with the requirements of CORSIA (including MRV) in 2024.⁶ However, to maintain the scheme's integrity and enable it to function as a credible decarbonization lever for the sector, actions must be taken to avoid duplicative MBMs on international aviation CO₂ emissions.

Furthermore, the landmark agreements on Article 6 of the Paris Agreement achieved at COP 29 provide sufficient clarity to host countries to issue letters of authorization/ attestation statements for projects aiming to supply credits for operators to use under CORSIA as CORSIA EEUs. Accelerating these efforts is crucial to creating sufficient liquidity in the CORSIA EEUs market in a timely manner.

5 The following options were proposed for aviation: a kerosene fuel levy; private jets fuel levy; a modular ticket levy; and a frequent flyer levy

6 According to data from the CORSIA Central Registry