



February 6, 2015

The Honorable Gina McCarthy
Administrator, U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

The Honorable Michael P. Huerta
Administrator, Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Administrators McCarthy and Huerta:

We write to reconfirm our commitment to a global sectoral approach to aviation and climate change under the International Civil Aviation Organization (ICAO) and to the development of appropriate regulatory provisions under U.S. law to help implement that approach. An aircraft standard for carbon dioxide (CO₂) that meets the ICAO Committee on Aviation Environmental Protection (CAEP) Terms of Reference can be an important part of that package.

As the record of the U.S. aviation sector demonstrates, we take our role in controlling greenhouse gas (GHG) emissions very seriously. For the past several decades, U.S. airlines and aircraft operators have dramatically improved fuel efficiency and reduced CO₂ emissions by investing billions in fuel-saving aircraft and engines, innovative technologies like winglets (which improve aerodynamics) and cutting-edge route-optimization software. As a result of our efforts, U.S. airlines have improved their fuel efficiency 120 percent since 1978 and together with other aircraft operators account for only 2 percent of the nation's GHG inventory,¹ while driving 5 percent of the nation's GDP.

Despite our strong record to date, we are not stopping there. Our organizations participate in a global aviation coalition that has committed to 1.5% annual average fuel efficiency improvements through 2020 and carbon neutral growth from 2020, subject to critical aviation infrastructure and technology advances achieved by government and industry. We are keenly focused on these advances, both at the national and international levels. For example, we are partnering to modernize the air traffic management system and to reinvigorate research and development in aviation environmental technology. And we are dedicated to developing commercially viable, sustainable alternative aviation fuel, which could be a game-changer in terms of aviation's output of GHG emissions while enhancing U.S. energy independence and security.

¹ U.S. Environmental Protection Agency, *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2012* (April 2014) at ES-2, Table 2-5, and Table 3-12, available at <http://www.epa.gov/climatechange/ghgemissions/usinventoryreport.html#fullreport>.

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But as aviation is a global industry, with airlines and aircraft operators operating internationally and aircraft manufacturers selling their aircraft in international markets, it is critical that aircraft emissions standards continue to be agreed at the international level. Accordingly, we appreciate the direct engagement of your organizations in the development of the CO₂ certification standard at ICAO.²

As you know, ICAO has a proven track record for developing and advancing rigorous aircraft environmental standards, with the aircraft standard for oxides of nitrogen having been tightened significantly in 2005 and 2011 and a new noise standard adopted in 2014.³ As EPA and FAA have done with other ICAO emissions standards, we urge you to ensure that any standard that moves forward for final approval at ICAO meets the CAEP Terms of Reference for technological feasibility, economic reasonableness, environmental benefit and consideration of the interrelationships between the various emissions parameters and noise. Besides being well-established for international standard-setting, the CAEP Terms of Reference and the ICAO/CAEP standard-setting process align well with the bases for the adoption of aircraft engine emission standards under Section 231 of the Clean Air Act.

We understand from the Information Paper that the U.S. submitted at the CAEP Steering Group last September and from the U.S. regulatory agenda that the EPA, with input from the FAA, plans to issue proposed "endangerment" and "cause or contribute" findings for the U.S. regulation of aircraft GHG emissions this spring. We concur with the observation the U.S. made in the CAEP Information Paper that such findings are a prerequisite to U.S. adoption of the expected ICAO CO₂ standard for aircraft.⁴ We urge you to rely on well-established science and to keep our industry's strong fuel efficiency and emissions-savings record, relative GHG emissions contribution and global sectoral approach commitment squarely in mind as you proceed to proposal.

Sincerely yours,



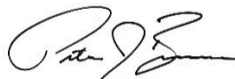
Nicholas E. Calio
President and Chief Executive Officer
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Aerospace Industries Association



Stephen A. Alterman
President
Cargo Airline Association



Peter J. Bunce
President and CEO
General Aviation Manufacturers Association



Ed Bolen
President and Chief Executive Officer
National Business Aviation Association

² We also support the work being undertaken in ICAO to develop proposals for a potential global market-based measure to serve as a "gap-filler" should we not be able to achieve carbon neutral growth from 2020 through concerted industry and government investments in technology, operations and infrastructure.

³ These standards, which were only the latest in a long series of ICAO noise and emissions standards, were respectively developed and recommended for ICAO adoption by CAEP/6, CAEP/8 and CAEP/9.

⁴ U.S. Aircraft Greenhouse Gas Rulemaking Process, CAEP-SG/20142-IP/13.