



International Civil Aviation Organization

**WORKING PAPER**

A40-WP/482  
EX/203  
3/9/19  
(Information paper)  
English only

**ASSEMBLY — 40TH SESSION**

**EXECUTIVE COMMITTEE**

**Agenda Item 17: Environmental Protection – Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)**

**JAPAN'S EXPERIENCE OF CORSIA IMPLEMENTATION**

(Presented by Japan)

**EXECUTIVE SUMMARY**

Japan welcomes the adoption of SARPs related to CORSIA. It is important to continually and timely proceed CORSIA implementation on ICAO and States.

This paper introduces how Japan has implemented CORSIA MRV in line with the timeline recommended by the Environmental Technical Manual, Volume IV as a case study, and shares the voices of all stakeholders with a view to contributing to the better implementation of CORSIA.

<i>Strategic Objectives:</i>	This working paper relates to Strategic Objective E – <i>Environmental Protection</i> .
<i>Financial implications:</i>	Not applicable
<i>References:</i>	<ul style="list-style-type: none"><li>• Doc 10075, <i>Assembly Resolutions in Force (as of 6 October 2016)</i></li><li>• ICAO Annex 16, Volume IV</li><li>• Doc 9501, <i>Environmental Technical Manual, Volume IV</i></li><li>• A40-WP/229, <i>Ensuring the success of CORSIA implementation</i></li></ul>

**1. INTRODUCTION**

1.1 Keeping in mind that the reduction of CO<sub>2</sub> emissions from international aviation is an important issue to be addressed by all ICAO Member States in a united manner, Japan welcomes the adoption of SARPs related to CORSIA in 2018 as a huge step forward for the globally shared goal. Japan implemented CORSIA MRV requirements into national legislations in 2018 and announced its willingness of voluntary participation in the pilot phase from 2021.

1.2 It is important to continually and timely proceed CORSIA implementation on ICAO and States under ICAO leadership as described on A40-WP/229, *Ensuring the success of CORSIA*

*implementation*, presented by Singapore. As a first step, Japan considers it essential for the success of CORSIA that all Member States implement the scheme in accordance with ICAO SARPs. In view of this, Japan is eager to share its experiences of CORSIA implementation.

## 2. IMPLEMENTATION INTO NATIONAL LEGISLATION

2.1 Japan enacted the amended national regulations related to CORSIA MRV on 9 November 2018, followed by the completion of all the EMPs submitted by aeroplane operators by 30 November 2018, meeting the recommendation deadline on Environmental Technical Manual, Vol. IV. In achieving this, Japan attached the most importance to swiftness, strictness and transparency as explained below.

### 2.1.1 Swiftness

2.1.1.1 Japan's legislative framework for civil aviation mainly consists of the Civil Aeronautics Act (the Act) which stipulates the basic principle and requires the approval of the Diet, the Ordinance for Enforcement of the Civil Aeronautics Act (the Ordinance) which stipulates concrete requirements based on the Act and is established by the Ministry, and subsequent Circulars which stipulate further detailed requirements set by the Civil Aviation Bureau Japan (JCAB) based on the Act and the Ordinance. In order to amend the Act, it generally takes an immense amount of time.

2.1.1.2 Meanwhile, considering the timeline set by SARPs and guidance, i.e. approval of all EMPs to be completed by 30 November 2018 after the adoption of SARPs in July 2018, Japan determined to implement CORSIA MRV requirements by amending the Ordinance and Circulars, thereby avoiding possible delay caused by amendments of the Act.

### 2.1.2 Strictness

2.1.2.1 In order to ensure that aeroplane operators responsibly implement CORSIA requirements without any amendments of the Act, it is essential to regulate them on the clear legal basis. Bearing this in mind, Japan incorporated the compliance with CORSIA MRV in the Ordinance as an additional requirement for international aeroplane operators to obtain a certificate stipulated in the Act, which enables a strict operation of CORSIA MRV including punitive provisions such as withdrawal of a certificate in case of material violations.

2.1.2.2 Further, Japan has legally mandated all international aeroplane operators, including those whose annual CO<sub>2</sub> emissions are less than 10,000 tonnes and having no obligation under the SARPs, to at least internally monitor the annual emissions and report to JCAB when coming closer to the threshold (the difference has already been notified to ICAO). This gives any aeroplane operator a responsibility related to CORSIA and enables JCAB to more strictly operate CORSIA by preventing any operators from unintentionally falling into the scope of CORSIA.

### 2.1.3 Transparency

2.1.3.1 Japan fully recognized the importance of providing stakeholders with sufficient explanations of CORSIA at an early stage in order to appropriately implement the completely new scheme within the limited time. For this purpose, Japan took finely-tuned responses holding explanatory meetings and training workshops several times for various stakeholders, including the National Accredited Body and possible candidates for verification bodies, as well as aeroplane operators.

2.1.3.2 Most frequently asked questions at the meetings were related to the preparation and submission of EMPs/Emission Reports, and the expected costs for offsetting. Japan answered the questions about the procedures, passing through the first stage of comprehension of provisions of SARPs and then the stage of in-depth discussions simulating the actual work flows. As for the cost related questions, Japan estimated the cost including a number of uncertainties though and provided aeroplane operators with an image of expected level of burdens, and sought an understanding of the background and intention of CORSIA through persevering explanations.

2.1.3.3 The above process led to better understanding of the stakeholders on the system from an early stage, which enabled the completion of approval of EMPs without delay as well as the timely amendments of national regulations.

### 3. CURRENT STATUS

3.1 All Japanese international aeroplane operators started the monitoring of CO<sub>2</sub> emissions based on the approved EMPs from 1 January 2019. So far, JCAB has not received any complaint from them.

3.2 In this situation, Japan sent out questionnaires to nine applicable operators in order to have their feedbacks on the current implementation status, and all of them returned their questionnaires.

#### 3.3 Outcomes of Questionnaire

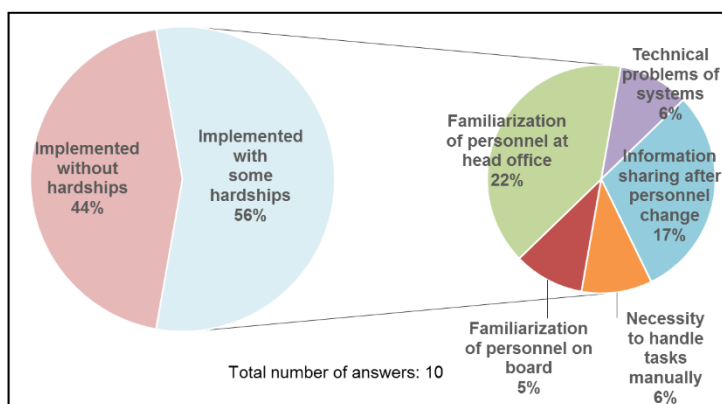


Figure 1: Current Implementation Status of CO<sub>2</sub> Monitoring and Details of “Hardships”

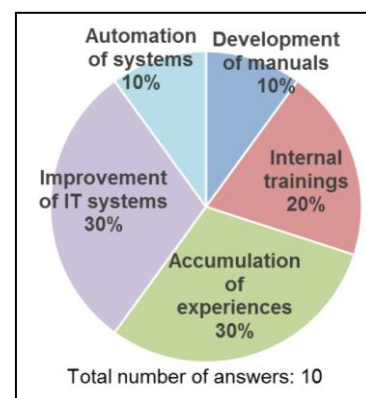


Figure 2: Countermeasures against the “Hardships”

3.3.1 The questionnaire showed that all operators successfully launched the monitoring, while half of them experienced some hardships either already solved or being addressed. Half of the hardships were related to personnel in charge, such as taking time for their familiarization with the new tasks and the sharing information after personnel change; the rest was related to technical problems of the system for data transfer and/or record (Figure 1). Each operator took proactive countermeasures such as development of manuals, holding internal training sessions, improvements of IT systems, etc., while there is also a case where the hardship was settled naturally after nearly six months of accumulation of experiences (Figure 2). The results have shown that the monitoring of CO<sub>2</sub> emission is appropriately conducted in Japan.

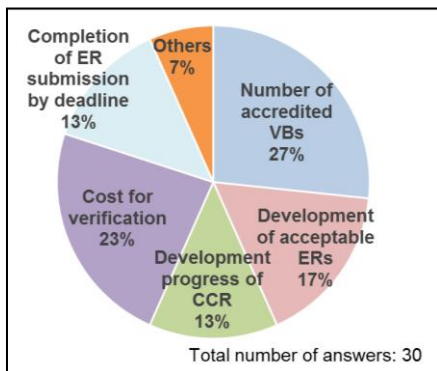


Figure 3: Concerns on Verification and Reporting

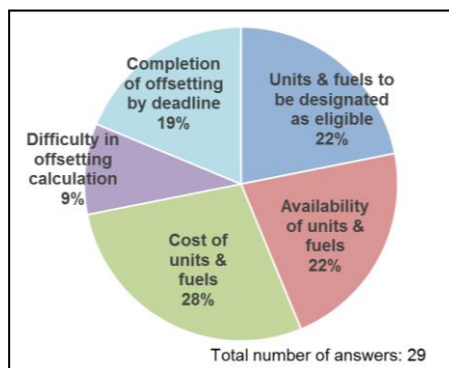


Figure 4: Concerns on Offsetting

3.3.2 Figure 3 shows that all operators have concerns to some extent about the future tasks of verification and reporting, which is quite understandable given their inexperience. The most frequently raised concerns were whether a sufficient number of verification bodies would be accredited in the future and how much the cost for verification would be, because there is no accredited verification body yet in Japan, and the number of verification bodies listed on the ICAO website is not sufficient at present. Likewise, all operators have some concerns about the uncertainty in the availability and costs for CORSIA eligible emission units and CORSIA eligible fuels as shown in Figure 4. They are keen to monitor the discussions on which emission units and fuels would be designated as eligible under CORSIA.

3.3.3 As for the future expectation and request, there is a strong demand for further information on the accreditation status of verification bodies as well as its prospect, and the progress of discussions on offsetting, which is particularly about CORSIA eligible emission units and CORSIA eligible fuels. Also, the necessity was raised for the online operation of CERT and its user manual together with the clarification of baseline-setting for new entrants during 2019-2020 (Figure 5). It is important to facilitate the discussions on these matters within ICAO and derive the conclusion as soon as possible in order to shake off the future uncertainties the stakeholders are facing.

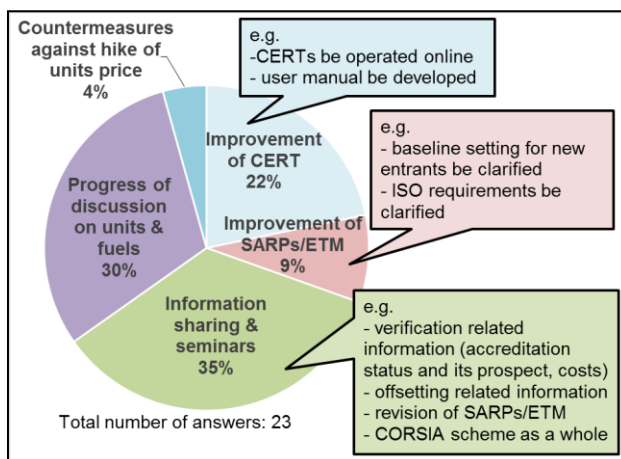


Figure 5: Expectation and Request for Future CORSIA Implementation

#### 4. CONTRIBUTION TO ACT-CORSIA

4.1 As Japan believes it is crucial that CORSIA, for its success, should be appropriately implemented by all Member States not only by specific State, Japan is proactively engaging in the Assistance, Capacity-building and Training for CORSIA (ACT-CORSIA) programme. In 2018, Japan provided technical assistance to five States, namely: Afghanistan, Bangladesh, Bhutan, Cambodia and Myanmar. In addition, Japan intends to expand the assistance to Malaysia as well this year.

4.2 During the course of such activities, Japan found that a number of States were struggling to find a way to introduce CORSIA into their national system, in addition to understand CORSIA scheme itself. Despite the differences in the legal structure and situation in each State, there was a strong demand from the recipient States that precedents of implementation be shared.

4.3 Assuming that the above would also be applied to the recipient States in the regions other than Asia, Japan is convinced that setting up a framework to consolidate donor States' experiences of implementation as case studies and provide them to the recipient States would be instrumental for the smooth implementation of CORSIA on a global scale.

#### 5. CONCLUSION

5.1 For the success of CORSIA, proper implementation in accordance with ICAO SARPs by all Member States is essential. In order to ensure this goal, many States are encouraged to share the experiences of CORSIA implementation and to participate in ICAO implementation activities such as ACT-CORSIA.

5.2 Furthermore, as indicated by the results of the questionnaire in Section 3, many stakeholders are hoping that ICAO's conclusions would be derived from the ongoing matters in a timely manner. Especially, the Council's adoptions with regard to CORSIA eligible emission units and CORSIA eligible fuels should be done as early as possible so that their sufficient availability would be secured without delay. Therefore, the progress of discussions at ICAO in a swift and collaborative manner is very important.

#### 6. DISCUSSION

6.1 Encourage States to share the experiences of CORSIA implementation and to participate in ICAO implementation activities such as ACT-CORSIA; and

6.2 Recognize that the Council's adoptions necessary for CORSIA implementation, such as matters regarding CORSIA eligible emission units and CORSIA eligible fuels, in a timely manner are important for the success of CORSIA.