

August 31, 2015

Air and Radiation Docket and Information Center
Environmental Protection Agency
Mail Code 28221T
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Docket ID No. EPA-HQ-OAR-2014-0828, Proposed Finding that Greenhouse Gas Emissions from Aircraft Cause or Contribute to Air Pollution that May Reasonably Be Anticipated to Endanger Public Health and Welfare and Advance Notice of Proposed Rulemaking

The National Business Aviation Association (NBAA) represents the interests over 10,000 Member companies that either use general aviation aircraft in support of their businesses travel needs or support the business aviation industry. NBAA and our Member companies have long supported local, regional and global efforts to address aircraft emissions.

NBAA's Member companies utilize aircraft to reach a wide diversity of locations in the US and around the globe. With nearly 90% of airports in the U.S. unserved by scheduled air transport, business aviation remains the only link for most of these small communities to the global marketplace. Business aviation allows companies of all sizes to be more productive, competitive and responsive to changing business climates. And in times of crisis, business aviation is often the first, best resource to transport relief aid and experts.

In the U.S. the general aviation industry contributes \$219 billion annually to the national economy while employing over 1.1 million people. According to the General Aviation Manufacturers Association (GAMA) 2014 General Aviation Statistical Databook and 2015 Industry Outlook, business jets, the segment that includes most general aviation aircraft affected by this proposal, constituted 11,637 of the total and were responsible for approximately 3.5 million hours of flying in the U.S.¹ in 2013.

Business Aviation's Commitment to the Environment

In 2009, GAMA and global operator groups represented by the International Business Aviation Council (IBAC) jointly issued a set of aspirational goals to improve the global business aviation fleet's efficiency going forward². The commitments, listed below, closely parallel similar commitments made by the commercial aviation industry:

¹ "2014 General Aviation Statistical Databook and 2015 Industry Outlook", tables 2.1 and 2.2, pp. 23-24

² IBAC/GAMA Business Aviation Statement on Climate Change: http://www.ibac.org/wp-content/uploads/2010/08/Bizav_and_ClimateChangeA4_full-statement.pdf

1. Achieving carbon-neutral growth from 2020 onward;
2. Improving fuel efficiency by 2% per year from 2009 to 2020, and;
3. Reducing CO₂ emissions by 50% by 2050 relative to 2005.

The business aviation industry stands by these goals, which are part of a four-pillar strategy that includes: improvements in the efficiency of operations; modernization of the air traffic control infrastructure; investing in new technology (including alternative fuels), and; market-based measures. This approach is supported by all sectors of the aviation industry and was endorsed at ICAO's 38TH General Assembly in October, 2013.³

Business aviation has established an excellent record of constantly improving fuel efficiency, delivering 40% improvement over the past 40 years. Business Aviation's global CO₂ emissions are very small, being approximately 2% of all aviation and .04% of global man-made carbon emissions. Business aircraft are operated for specific missions and they fly efficient, direct routes between airports. Modern navigation equipment, combined with the latest technologies in aircraft and engine design and operational best practice provide for ever improving fuel efficiency and reduced GHG emissions.

EPA Must Respect Global Efforts

In February, 2016, the aviation industry expects the several-year CAEP (Committee on Aviation Environmental Protection) effort to finalize an internationally supported emission standard for CO₂. With less than six months remaining in the group's deliberations, we are puzzled by EPA's preemptive efforts to develop a U.S. standard in the absence of CAEP's recommendations.

As EPA notes in its proposal,

"The EPA and the Federal Aviation Administration (FAA) traditionally work within the standard-setting process of ICAO's Committee on Aviation Environmental Protection (CAEP) to establish international emission standards and related requirements. Historically, under this approach, international emission standards have first been adopted by ICAO, and subsequently the EPA has initiated rulemaking under CAA (Note: Clean Air Act) section 231 to establish domestic standards equivalent to ICAO's standards where appropriate."

While we recognize the deliberative timeline that accompanies most rulemaking efforts in the U.S., it is also imperative that U.S. efforts not be viewed as unilateral or ignorant of international visibility. As with nearly every aviation standard, coordinated implementation

³ International Civil Aviation Organization (ICAO) Assembly – 38th Session. Report of the Executive Committee on Agenda item 17 (Section on Climate Change) A38-WP/430; P/44; 3/10/13 recommending adoption of Resolution 17/2.

across all of ICAO's Member states helps to ensure compliance while reducing confusion and unintended market impacts.

Aviation remains a vital export for the U.S. economy and it is a key tool for helping U.S. businesses compete across the globe. We strongly urge the EPA to delay action until the CAEP/10 meeting next February where we expect significant progress on a CO₂ standard.

Finally, NBAA recognizes that environmental advocates will be pressuring the EPA to adopt an emissions and stringency standard that exceeds internationally adopted recommendations. NBAA believes that any recommendation for changes in aviation emissions or stringencies must flow from internationally developed and supported standards. Aviation is a global industry that regularly moves across regulatory boundaries. Arbitrarily setting a higher standard will have significant negative consequences that could result in a patchwork of uncoordinated standards, stifle innovation, increase costs and harm U.S. exports.

Substantial Industry Comments

In addition to our views, NBAA also strongly supports the statements and concerns raised by the General Aviation Manufacturers Association (GAMA) and Airlines for America (A4A). NBAA has worked with GAMA and A4A over the last several years as participants in the CAEP process. We believe that their efforts and leadership on this issue sets a high bar for our industry's shared ideals of commitment, support and concern.

The business aviation community remains committed to improving our sector's environmental performance through a variety of operational, technical and policy measures. We appreciate the opportunity to offer our comments. Please let us know if we can provide any additional information.

Sincerely,



Douglas Carr
Vice President, Regulatory & International Affairs