

【欧州】 【Common, 航空】

Common - Fit for 55 package/Aviation - Gas emissions: European Parliament and the Council reach provisional agreement on amending the EU-ETS for aviation towards the 2030 GHG emission reduction target

Andrea Antolini Former Researcher JTTRI

【概要 : Summary】

The EU's transport sector's GHG emissions currently represent around 25% of the EU's total GHG emissions. To achieve the EU's climate neutrality target by 2050, the European Commission presented the European Green Deal in 2019 and introduced the European Climate Law (Regulation (EU) 2021/1119) with an increased GHG emission reduction target of at least 55% to be reached by 2030, compared with 1990 levels.

On 14 July 2021, the European Commission presented the "Fit for 55" legislative package with proposals to align the EU's climate, energy, transport, and taxation related legislation with the new 2030 GHG emission reduction target. This also includes a proposal for the revision of the EU-ETS for aviation with stricter rules to reduce GHG emissions in the aviation sector. Aviation is one of the sectors most difficult to decarbonise due to its strong reliance on fossil energy. At the same time, it has only limited technological options available for reducing its CO₂ emissions, while it is also one of the fastest-growing sources of GHG emissions within the transport sector. Therefore, the "Fit for 55" package also contains the ReFuelEU Aviation proposal (COM (2021) 561 final), which will

oblige fuel suppliers to blend increasing levels of sustainable aviation fuels (SAFs) into jet fuel at EU airports.

Meanwhile, on 6 December 2022, the European Parliament and the Council found a provisional political agreement on the revision of the EU-ETS for aviation regarding the aviation sector's contribution to the 2030 target of reducing GHG emissions by at least 55% by 2030.

【記事 : Article】**1. Background of the revision of the EU-ETS for aviation**

Aviation accounts for 2-3% of global CO₂ emissions and is one of the fastest-growing sources of GHG emissions due to further major increases in traffic. At EU-level, aviation made up 3.7% of total CO₂ emissions. While until 2019, aviation emissions continued to increase steadily, during the COVID-19 pandemic, the aviation traffic dropped by 90% and the CO₂ emissions dropped accordingly (European Parliament 2022a). However, it is expected that by 2024, the aviation sector will have reached its pre-pandemic levels in traffic volumes as well as GHG emissions. Initially, the reduction of the aviation sector's GHG emissions was excluded from the EU-

ETS, which was introduced as one of the main tools for reducing GHG emissions from installations in several manufacturing industries in 2005.

While the aviation sector's GHG emissions are not included in the Paris Agreement, the International Civil Aviation Organisation (ICAO) had to accept the responsibility for introducing measures to reduce the aviation sector's GHG emissions. However, since the decision-making process within the ICAO was difficult and delayed, the EU introduced the EU-ETS for aviation in 2012. Since 2012, the EU-ETS for aviation covers the GHG emissions of intra-EU aviation within the European Economic Area (EEA), based on Regulation No. 421/2014 and Regulation (EU) 2017/2392, until 2023 (European Commission 2021a, EEA n.d.).

Under the 2012 EU-ETS for aviation, the reduction of GHG emissions from aviation was originally supposed to cover all flights, extra and intra-EEA flights (European Parliament 2022a).

However, after international criticism, the EU decided to maintain the geographic scope of the EU-ETS for aviation limited to intra-EEA flights. The introduction of this geographic limitation is also known as the “stop-the-clock” measure in an effort to support the setting-up of an international system under the ICAO's lead. The Stop-the-clock measure is set to expire on the 31 December 2023 (European Parliament 2022a).

At international level, only in October 2016, the ICAO agreed on a Resolution for a global market-based measure to address CO₂ emissions from international aviation as of 2021. The agreed Resolution sets out the objective of the global scheme, and a roadmap for implementing modalities (European Commission n.d.b). The Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) intends to limit CO₂ emissions from international aviation and aims to stabilise CO₂ emissions at 2020 levels by requiring airlines to offset the growth of their GHG emissions after 2020 (European Commission n.d.b). It is expected that the CORSIA scheme could achieve a modest

reduction of the net climate impact of international aviation up to 2035, but only if high-quality offsets are used. In fact, if airlines increase their GHG emissions while using cheap or inadequate carbon offsets, it could lead to a further increase of GHG emissions in aviation. In 2032, the ICAO will review the CORSIA scheme and decide, whether the scheme should be ended, extended, or improved for the period after 2035. While the CORSIA scheme entered the pilot phase, the EU-ETS for aviation continues to be applied within the EEA. In 2019, aviation emissions covered by the EU-ETS amounted to 68.2 Mt Coe, representing an increase of 1.0% compared to 2018. According to the Commission, 54% of these emissions were covered by allowances acquired from auctions or other sectors (European Commission 2021a). Aircraft operators received free allocation of 31.3 million allowances, covering 46% of their total emissions.

However, according to the European Commission (2022a), the aviation sector's GHG emissions in Europe increased by an average of 5% year-on-year between 2013 and 2019 and they are expected to further grow (European Commission 2022a). Consequently, the European Commission presented also legislative proposals under the “Fit for 55” package to achieve a reduction of GHG emissions in the EU's aviation sector.

2. The “Fit for 55” package proposals to reduce the aviation sector's CO₂ emissions and the ICAO's CORSIA scheme

Currently, the EU's transport sector is responsible for around 25% of the EU's total GHG emissions, and a clear path is needed to achieve the 2050 net-zero GHG emissions target as well as the 90% reduction of transport-related GHG emissions by 2050. The European Climate Law (Regulation (EU) 2021/1119) establishes the framework for achieving the European Green Deal's target. Accordingly, the European Commission adopted a set of proposals to align

the EU's climate, energy, transport, and taxation legislation with the new 2050 GHG emission reduction target and the mid-term target of an at least 55% reduction by 2030, compared to 1990 levels (European Commission n.d.a).

In parallel, the voluntary CORSIA pilot phase started in 2021. It will continue until 2023 and will be followed by the voluntary first phase from 2024 to 2026. A mandatory phase will start in 2027 and will end in 2035. All EU Member States decided to take part in the CORSIA pilot phase from 1 January 2021 (European Parliament 2022a, European Commission n.d.b). During the period 2021-2035, and based on expected participation, the scheme is estimated to offset around 80% of the GHG emissions above 2020 levels.

The introduction of the ICAO's CORSIA in the EU and the continuation of the EU-ETS for aviation leads to the parallel existence of the two systems. However, since the CORSIA scheme is not expected to significantly reduce the CO₂ emissions from aviation, the EU-ETS will remain the EU's main scheme to achieve the net-zero GHG emission level by 2050 and the 90% reduction of GHG emissions from the transport sector. Therefore, the "Fit for 55" package covers also measures to amend the EU-ETS for aviation and to further reduce the aviation sector's GHG emissions within the EEA. Relevant proposals for the aviation sector in the "Fit for 55" package are the proposal on EU-ETS and CORSIA (COM (2021) 551 final) and COM (2021) 552 final; the ReFuelEU Aviation initiative (COM (2021) 561 final) to introduce a SAF sustainable aviation fuels' blending mandate, and the review of the Energy Taxation Directive (ETD) (COM (2021) 563 final), which puts forward minimum rates of taxation in aviation that should also encourage a switch to SAFs in aviation.

The "Proposal for a Directive of the European Parliament and of the Council amending Directive 2003/87/EC establishing a system for greenhouse gas emission allowance trading within the Union, Decision (EU) 2015/1814 concerning the

establishment and operation of a market stability reserve for the Union greenhouse gas emission trading scheme and Regulation (EU) 2015/757 " (COM (2021) 551 final) as well as the "Proposal for a Directive of the European Parliament and of the Council amending Directive 2003/87/EC as regards aviation's contribution to the Union's economy-wide emission reduction target and appropriately implementing a global market-based measure " (COM(2021) 552 final) mainly contain amendments regarding the aviation sector's CO₂ emission calculation of the total number of allowances in circulation and a further reduction of free EU-ETS allowances. Flights within the European Economic Area (EEA), as well as flights to Switzerland and the UK, will continue to be covered (COM (2021) 551 final).

The total number of aviation allowances in the EU-ETS will be capped at current levels and be reduced annually by 4.2% (linear reduction factor). Furthermore, allocation of the free allowances will stop by the end of 2026 and full auctioning of allowances will then start by 2027 to create a stronger price signal to drive emissions reduction (COM (2021) 551 final).

In parallel, the proposal COM (2021) 551 implements also the International Civil Aviation Organization (ICAO)'s Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) for emissions from extra-EEA international aviation flights in the EU legislation (European Commission 2021a).

The EU already has an integrated monitoring, reporting and verification framework for the EU-ETS and CORSIA in place (European Commission 2021b). From 2021, airlines will need to start offsetting the growth in emissions from the routes between states, which have volunteered to participate in CORSIA's pilot phase. When emissions from flights outside the EEA reach levels above 2019, they will have to be offset with corresponding carbon credits.

Furthermore, the proposal COM(2021) 552 final contains amendments regarding the treatment of the aviation sector's CO₂ emissions under the EU-ETS and the transposition of the CORSIA scheme's rules into the EU's legislation. The review of the EU-ETS for aviation should ensure that CORSIA is implemented appropriately, and it needs to ensure equal treatment of airlines. One of the main legal amendments in the EU-ETS Directive will be to continue the application of the EU-ETS for intra-European (EEA) flights while applying CORSIA to extra-European flights. Therefore, the EU-ETS, including deadlines and surrender obligations, remains in force and unaffected for the time being (DEHSt 2020). To ensure that the EU's CORSIA implementation supports the Paris Agreement goals and gives incentives for broad participation to CORSIA, the compliance credits must originate from states that are Parties to the Paris Agreement and that participate in CORSIA, and double counting of credits is avoided (COM/2021/552 final).

The EU-ETS reform is expected to incentivise the decarbonisation of the aviation sector by introducing costs-effective aviation emission reductions. This should be achieved by the inclusion of the aviation emissions into the calculation of the total number of allowances in circulation, by capping the total number of aviation allowances in the EU-ETS. Furthermore, the number of free allowances allocated to aircraft operators will be phased out until the end of 2026.

While long-term solutions for reducing GHG emissions from aviation could range from more efficient jet engines to new aircraft designs, including battery-electric and hydrogen-powered solutions, in mid-term, the aviation sector's decarbonisation will highly depend on the increase of the use of SAF, as currently, 99% of all jet fuels used is Kerosene. The ReFuelEU Aviation initiative (COM (2021) 561 final) intends to significantly increase the aviation

sector's utilisation of renewable energies and sustainable aviation fuels (SAFs) The ReFuelEU Aviation will impose a blending mandate and a minimum share of SAF to be used by airlines (COM (2021) 561 final). The ReFuelEU Aviation will also aim at ensuring electricity supply for stationary commercial aircraft at all gates by 2025, and at all outfield positions by 2030.

Tax increases on kerosene are also considered being a meaningful measure for reducing GHG emissions in aviation. Therefore, the revision of the Energy Tax Directive COM (2021) 563 final will be important to align the taxation of energy products with EU energy and climate policies (COM (2021) 563 final). The wide range of national exemptions and reductions that in fact favour the use of fossil fuels in the EU must be gradually abolished. Moreover, the revision of the Renewable Energy Directive (COM (2021) 557 final) complements the ReFuelEU Aviation initiative and also supports the decarbonisation of aviation.

3. Council and Parliament find agreement on the revision of the EU-ETS for aviation

Under the EU-ETS for aviation, airline companies flying within Europe must obtain permits from the EU carbon market to cover their CO₂ emissions. However, the airlines receive most of the permits for free since 2012 (COM(2021) 552 final). Since auctioning of emission permits is the default method in EU-ETS, the allocation of allowances for free under the EU-ETS for aviation is considered being a derogation from the "polluter pays" principle.

Therefore, the increased ambition in the amended EU-ETS will strengthen the current provisions and extend the scope of the EU-ETS for aviation. The proposal aims to phase out the free allocation of emission allowances to aviation and will implement the CORSIA scheme through the EU-ETS (Council of the EU n.d., COM(2021) 552 final).

The main legal amendments are a consolidation of the total quantity of aviation allowances at

current levels, and to introduce a linear reduction factor. In accordance with Article 9 of the EU-ETS Directive (COM(2021) 552 final), the auctioning of aviation allowances will increase, intra-European application of the EU-ETS will continue while applying CORSIA to extra-European flights; and airlines are treated equally on the same routes regarding their obligations among others (COM(2021) 552 final).

In the European Parliament, the proposal COM(2021) 552 final was referred to the Committee on Environment, Public Health, and Food Safety (ENVI) and Sunčana Glavak was appointed as rapporteur.

The ENVI Committee adopted its report on 17 May 2022 and presented it for voting in the European Parliament's Plenary in the June I 2022 session. The ENVI Committee's report called for a further acceleration of the phasing out of free EU-ETS allowances for aviation, reaching full auctioning in 2025 versus 2027 in the Commission proposal (European Parliament 2022a). The ENVI also proposed to expand the EU-ETS for aviation's scope to cover not only intra-EEA flights but also flights to third countries departing the EEA (European Parliament 2022b).

The ENVI report also requested a monitoring, reporting and verification (MRV) framework for non-CO₂ emissions from aviation, with a view to expand the scope of EU-ETS to these, if deemed appropriate, among others. The Parliament adopted the report during the June I 2022 plenary session with a mandate for starting trilogue negotiations with the Council (European Parliament 2022b).

On 29 June 2022, the Council of the European Union adopted its negotiating positions with its general approach on the EU-ETS revision. Among other topics, the Council agreed to phase out free emission allowances for the aviation sector gradually by 2027 and aligning the EU-ETS for aviation proposal with the global CORSIA (Council of the EU 2022). The Council agreed on applying the EU-ETS for intra-European flights

including the UK and Switzerland, while CORSIA will apply to EU operators for extra-European flights to and from third countries participating in CORSIA. The Council agreed to set aside 20 million of the phased-out free allowances to compensate for the additional costs associated with the use of sustainable aviation fuels (SAFs) (Council of the EU 2022a).

After the Council agreed its negotiation position, the trilogue negotiations with the European Parliament began to reach a final agreement on the proposal's legal text.

On 6 December 2022, the Council of the EU and the European Parliament reached a provisional political agreement on the revision of the EU-ETS rules applying to the aviation sector.

The reform of the current EU-ETS for aviation will include a gradual phasing out of free allowances between 2024 and 2026 (Council of the EU 2022c). In 2024, the free emission allowances will be reduced by 25%, 50% in 2025 and 100% from 2026 with a full auctioning starting from 2026 (Council of the EU 2022b). Regarding the use of revenues, the Council and Parliament agreed to transfer 5 million allowances from the aviation sector to the innovation fund. They also agreed to set aside 20 million free allowances to incentivise the uptake of fuels that are promising for the decarbonisation aviation in the short term (Council of the EU 2022b).

Regarding the scope of the revised EU-ETS for aviation, the revised EU-ETS for aviation will apply to intra-European flights including departing flights to the United Kingdom and Switzerland, while CORSIA will apply to extra-European flights to and from third countries participating in CORSIA from 2022 to 2027 (Council of the EU 2022b). Therefore, until the start of 2027, EU carbon pricing will maintain its current scope and mechanism to exclude international flights to and from third countries ("stop the clock" mechanism). When GHG emissions from flights to and from outside the

European Economic Area (EEA) reach levels above 85% of 2019-levels, they will have to be offset with corresponding carbon credits, invested in emissions reductions in countries participating in CORSIA (Council of the EU 2022b).

The political agreement of the Council and the Parliament also contains a new support scheme to speed up the use of SAFs in aviation, which is financed by the EU-ETS revenues. Furthermore, they agreed that all fuels eligible under RefuelEU, except fuels derived from fossil fuels, will be eligible for the SAF allowances until 2030 (Council of the EU 2022b).

Moreover, a new monitoring system will be introduced to monitor, report and verify the aviation sector's non-CO₂ emissions and climate effects of aviation (European Commission 2022a). According to the Czech minister of the environment Marian Jurečka, this agreement effectively paves the way for meeting the EU's objective of reducing transport emissions by 90% by 2050 (Council of the EU 2022b). It also ensures the aviation sector's contribution to the EU's emission reduction objectives under the Paris Agreement and to the European Green Deals target to reach carbon neutrality by 2050 (Council of the EU n.d.).

Furthermore, the Council and Parliament agreed that after the 42nd Assembly of the ICAO, which will take place in 2025, the Commission will assess if the implementation of CORSIA by operators is sufficient to reduce the aviation sector's GHG emissions considering the objective of the Paris agreement (Council of the EU 2022b). Depending on the assessment results, the European Commission will make a legislative proposal. If CORSIA delivers on its objectives, the Commission will make a proposal to the Council and Parliament that CORSIA will continue to apply to extra-European flights to and from third countries participating in CORSIA (Council of the EU 2022b). If CORSIA is not sufficient, the Commission will make a proposal to extend the scope of the EU-ETS

to all flights departing from the EEA (Council of the EU 2022b, European Commission 2022a).

The co-legislators' agreement also provides for a new support scheme to speed up the use of sustainable aviation fuels, financed with EU-ETS revenues which are estimated at €1.6 billion. As non-CO₂ effects on climate from aviation are at least as important as the impact of CO₂ alone, the amended EU-ETS will also create a new system for airlines to monitor, report and verify non-CO₂ emissions and climate effects of aviation (European Commission 2022a). The monitoring, reporting and verification (MRV) system for non-CO₂ effects in aviation will be implemented from 2025. By 2027, the Commission will submit a report based on the MRV and, by 2028, after an impact assessment, the Commission will make a proposal to address non-CO₂ effects (European Commission 2022a).

The provisional agreement of the Council and the Parliament will allow to address aviation emissions within the EU, but also outside by aligning the EU-ETS for aviation with the ICAO's CORSIA (Council of the EU 2022b). The European Commission welcomed the agreement, setting in law the aviation sector's contribution to the 2030 GHG emission reduction target (European Commission 2022a).

Once the provisional political agreement will be formally adopted by the Council and the Parliament, the new legislation will be published in the Official Journal of the European Union and enter into force with immediate effect (European Commission 2022a, Council of the EU 2022b).

4. Conclusion

To achieving the net-zero GHG emissions target by 2050 and the mid-term target for 2030, the European Commission presented the set of legislative proposals under the "Fit for 55" Package, including significant CO₂ emission reduction measures.

The EU-ETS for aviation reform will include a phasing out of free allowances allocated to aircraft operators, which is expected to incentivise the decarbonisation of the aviation sector over time. Furthermore, the ReFuelEU Aviation (COM (2021) 561 final) will oblige fuel suppliers to blend in an increasing amount of SAFs into jet fuel at EU airports. The widening of the scope of the EU-ETS for aviation and the phasing out of free allowances means that the aviation sector will have a greater responsibility to pay for its carbon footprint. The political agreement on the revision of the EU-ETS for aviation also includes the option to change the EU's policy regarding the coverage of flights to third countries, pending the outcome of the European Commission's assessment on the CORSIA scheme's success in the voluntary pilot and the first phase.

References

COM/2019/640 final: COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE EUROPEAN COUNCIL, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS. The European Green Deal. COM/2019/640 final. In: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1588580774040&uri=CELEX:52019DC0640>, 11.12.2019, accessed 20 July 2021

COM (2021) 551 final: Proposal for a Directive of the European Parliament and of the Council amending Directive 2003/87/EC establishing a system for greenhouse gas emission allowance trading within the Union, Decision (EU) 2015/1814 concerning the establishment and operation of a market stability reserve for the Union greenhouse gas emission trading scheme and Regulation (EU) 2015/757 “(COM (2021) 551 final). In: https://ec.europa.eu/info/sites/default/files/revision-eu-ets-with-annex_en_0.pdf, 14 July 2021, accessed 12 December 2022

COM(2021) 552 final: Proposal for a Directive of the European Parliament and of the Council amending Directive 2003/87/EC as regards aviation's contribution to the Union's economy-wide emission reduction target and appropriately implementing a global market-based measure (COM (2021) 552 final). In: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021PC0552>, 14.7.2021, accessed 12 December 2022

COM (2021) 561 final: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on ensuring a level playing field for sustainable air transport. COM (2021) 561 final. In: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021PC0561>, accessed 12 December 2022

COM (2021) 563 final: Proposal for a COUNCIL DIRECTIVE restructuring the Union framework for the taxation of energy products and electricity (recast). COM (2021) 563 final. In: https://ec.europa.eu/info/sites/default/files/revision_of_the_energy_tax_directive_0.pdf, 14.7.2021, accessed 12 December 2022

Council of the EU (n.d.): Fit for 55. In: <https://www.consilium.europa.eu/en/policies/green-deal/fit-for-55-the-eu-plan-for-a-green-transition/>, no date, accessed 12 December 2022

Council of the EU (2022a): Fit for 55 package: Council reaches general approaches relating to emissions reductions and their social impacts. In: <https://www.consilium.europa.eu/en/press/press-releases/2022/06/29/fit-for-55-council-reaches-general-approaches-relating-to-emissions-reductions-and-removals-and-their-social-impacts/>, 29 June 2022, accessed 12 December 2022

Council of the EU (2022b): ETS aviation: Council and Parliament strike provisional deal to reduce flight emissions. In: <https://www.consilium.europa.eu/en/press/press-releases/2022/12/07/ets-aviation-council-and-parliament-strike-provisional-deal-to-reduce>

[flight-emissions/](#), 7 December 2022, accessed 14 December 2022

Council of the EU (2022c): Infographic - Fit for 55: reform of the EU emissions trading system. In: <https://www.consilium.europa.eu/en/infographics/fit-for-55-eu-emissions-trading-system/>, accessed 14 December 2022

DEHSt 2020 (Deutsche Emissionshandelsstelle): Climate protection in Aviation - CORSIA and the EU ETS. Fact sheet. In: https://www.dehst.de/SharedDocs/downloads/EN/publications/Factsheet_CORSLIA_EU_ETS.pdf;jsessionid=9E3C42E09B14AB5888624E907F053B48.2_cid331?__blob=publicationFile&v=3, accessed 12 December 2022

European Commission (n.d.a): Transport and the Green Deal. Providing efficient, safe, and environmentally friendly transport. In: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/transport-and-green-deal_en, no date, accessed 12 December 2022

European Commission (n.d.b): Reducing emissions from aviation. In: https://climate.ec.europa.eu/eu-action/transport-emissions/reducing-emissions-aviation_en#aviation-emissions, no date, accessed 12 December 2022

European Commission (2021a): Questions and Answers - Emissions Trading - Putting a Price on carbon. In: https://ec.europa.eu/commission/presscorner/detail/en/qanda_21_3542, 14 July 2021, accessed 12 December 2022

European Commission (2021b): European Green Deal: Commission proposes transformation of EU economy and society to meet climate ambitions. In: https://ec.europa.eu/commission/presscorner/detail/en/qanda_21_3525, 14/07/2021, accessed 12 December 2022

European Commission (2022a): European Green Deal: new rules agreed on applying the EU emissions trading system in the aviation sector. In:

https://ec.europa.eu/commission/presscorner/detail/en/IP_22_7609, 9 December 2022, accessed 12 December 2022

European Environment Agency (EEA) (n.d.): Climate and Energy in the EU. Intro. In: <https://climate-energy.eea.europa.eu/topics/climate-change-mitigation/european-trading-system-emissions/intro>, no date, accessed 12 December 2022

European Parliament (2022a): Draft Report on the proposal for a directive of the European Parliament and of the Council amending Directive 2003/87/EC as regards aviation's contribution to the Union's economy-wide emission reduction target and appropriately implementing a global market-based measure (COM(2021)0552 - C9-0319/2021 - 2021/0207(COD)) Committee on the Environment, Public Health, and Food Safety Rapporteur: Sunčana Glavak. In: https://www.europarl.europa.eu/doceo/document/EN_VI-PR-703137_EN.pdf, 17.1.2022, accessed 14 December 2022

European Parliament (2022b): Revision of the EU Emissions Trading System for aviation, as part of the European Green Deal. In "A European Green Deal". Legislative train schedule. In: <https://www.europarl.europa.eu/legislative-train/package-fit-for-55/file-revision-of-the-eu-emission-trading-system-for-aviation>, 20.11.2022, accessed 14 December 2022