



Information for aircraft operators

Linking the European Emissions Trading System (EU-ETS) with the Swiss Emissions Trading System (CH-ETS)

**Umwelt
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1 When did the agreement on linking the European Emissions Trading System (EU-ETS) to the Swiss Emissions Trading System (CH-ETS) enter into force and where can the text of the agreement be found?

The European Union and Switzerland concluded an agreement to link their emissions trading systems on 7 December 2017. After being ratified by both sides in December 2019, the agreement entered into force on 1 January 2020. The [text of the agreement](#) and the [relevant version of Annexes I and II](#), effective from 1 January 2020, can be accessed via the “EUR-Lex” Portal of the Publications Office of the EU. The annexes set out common rules for recording emissions in the EU-ETS and the Swiss ETS. They are directly applicable through Article 28a(7) in conjunction with Article 25a of the Emissions Trading Directive 2003/87/EC.

2 Which authority will be responsible? What does the so-called “one-stop shop” involve?

According to the Linking Agreement, aircraft operators with a Swiss operating licence will be administered by Switzerland; the administering state will not change for any other aircraft operator.

In order to avoid an additional administrative burden for aircraft operators, the principle of the so-called “one-stop shop” has been implemented. Aircraft operators whose flights fall under both emissions trading systems will be administered by only one state. This means that all previous IT systems or communication channels are retained and the duplication of work is avoided. Emission reports or monitoring plans need only be submitted to one authority and allowances to be surrendered in one registry. The allocation of emissions and allowances to the two emissions trading systems is carried out by the competent authority.

3 Which flights or emissions must be reported from 2020 onwards? For what emissions is there an obligation to surrender allowances?

Under the agreement, flights from the European Economic Area (EEA) to Switzerland are governed by the EU-ETS, while flights from Switzerland to the EEA and within Switzerland by the CH-ETS. For all these flights, CO₂ emissions must be monitored and reported from 1 January 2020. However, the previous exemptions for flights to and from outermost regions (e.g. the Canary Islands) or flights for medical care will continue to apply. For flights subject to reporting obligations surrendering of the corresponding amount of allowances will be required. This must be completed for the first time by 30 April 2021 for the 2020 emissions.

4 Do allowances have to be surrendered in both emissions trading systems?

No, allowances equal to the emissions generated in both systems need only be surrendered in one emissions trading system or registry.

5 Can allowances from both systems be used to meet surrender obligations without restrictions?

Yes, allowances in both emissions trading systems are equal for all aircraft operators and can generally be used in full to meet the surrender obligation in the other system.

6 Will aircraft operators, who have low emissions in one of the two emissions trading systems, still have to report them and surrender allowances?

If an aircraft operator is subject to emissions trading in one of the two systems, i. e. if he has exceeded the relevant thresholds, then there is also a reporting and surrender obligation for flights or emissions from the other system. This applies regardless of whether the flights or emissions of the other system, taken alone, would fall below the thresholds in that system.

Aircraft operators are therefore only excluded from emissions trading if they are below the relevant thresholds in both the EU-ETS and the CH-ETS.

7 Are there exceptions for certain flights in the CH-ETS?

The exemptions for certain flights (e. g. flights under visual flight rules or flights with aircraft having a maximum take-off mass of less than 5,700 kg) within the CH-ETS are almost identical to those of the EU-ETS. The relevant exemptions are listed in Annex I, Part B, No. 2.2 of the Agreement.

8 Is there a change in the basic geographical scope (“full scope”) to be used for the assessment of the ET obligation?

No. The European Commission has ruled in its Decision 2020/1071 that flights from Switzerland to the European Economic Area (EEA) must continue to be included.

9 Will there be additional free allowances due to the linking of the two systems?

A distinction must be made between free allocation for the EU-ETS and the CH-ETS. For aircraft operators that had submitted their tonne-kilometre data for 2010 to DEHSt in 2011, the data was used to calculate the amount of free allowances for the transport service provided on flights from the EEA to Switzerland. The resulting amount of free allowances was issued in August 2020. In order to receive a free allocation for the CH-ETS, aircraft operators had to submit transport performance data for the year 2018 to Switzerland. The Swiss authority then used this data to calculate the amount of free allowances for transport services on flights from Switzerland to the EEA and within Switzerland.

10 Does a new monitoring plan have to be submitted if flights covered by the CH-ETS are also operated?

No. The previously valid monitoring plan remains valid. However, aircraft operators should make sure that their internal procedures ensure that flights affecting Switzerland are taken into account.

11 What must be observed with regard to CORSIA reporting for Swiss flights?

The linking of the two emissions trading systems has no effect on the previous CORSIA reporting under the Delegated CORSIA Regulation (EU) 2019/1603 for aircraft operators who have to report their CORSIA emissions to Germany. Flights between the EEA and Switzerland continue to be subject to reporting requirements under Article 2(1) of the Delegated CORSIA Regulation. However, since Switzerland, despite the link, has still to be regarded as a third country in the sense of the Delegated CORSIA Regulation, flights between Switzerland and a non-EEA state continue not to be subject to reporting requirements, but may be reported voluntarily in accordance with Article 2(4) of the Delegated CORSIA Regulation.

12 How are emissions from Swiss flights reported in the Form Management System (FMS)?

Due to the linking, all flights between the EEA and Switzerland (both directions) subject to reporting and surrendering must be entered exclusively in the form “Carbon dioxide emissions in EU-ETS by aerodrome pair” from the reporting year 2020 onwards. Flights between Switzerland and non-EEA countries can still be reported voluntarily in the form “Carbon dioxide emissions under article 2 del. Regulation (EU 2019/1603) by aerodrome pair”.

13 Where can further information be found?

Further information can be found on the website of the European Commission and on the website of the Swiss Federal Office for the Environment.



European Commission

https://ec.europa.eu/clima/policies/ets/markets_en#tab-0-3

Swiss Federal Office for the Environment

www.bafu.admin.ch/bafu/en/home/topics/climate/info-specialists/climate-policy/emissions-trading/linking-the-swiss-and-eu-emissions-trading-schemes.html

Of course, the DEHSt is also available at any time to answer your questions.

