



Information for aircraft operators

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

Editorial information

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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 (see links above). 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 license will be administered by Switzerland; the administering state will not change for other aircraft operators.

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 one state only. 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 to be submitted only to one authority and allowances need to be surrendered in one registry only. 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? For what emissions is there an obligation to surrender allowances?

Under the agreement, from 1 January 2020 flights from the European Economic Area (EEA) to Switzerland are governed by the EU ETS, while flights from Switzerland to the EEA, within Switzerland and from 1 January 2023 also from Switzerland to UK by the CH ETS. For all these flights, CO₂ emissions must be monitored and reported from 1 January 2020 respectively from 1 January 2023. 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 had to 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 by the aircraft operator in both systems need to be surrendered in one emissions trading system or registry only.

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 geographical 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. Further information on the different geographic scopes can be found on our homepage under “Scope”.

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 has 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 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) as well as flights within Switzerland 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. From the reporting year 2023, this also applies to flights from Switzerland to the UK. All other flights between Switzerland and non-EEA countries have to be reported in the form “Carbon dioxide emissions under Article 2 del. Regulation (EU 2019/1603) by aerodrome pair”.

12 What are the consequences for the exemption from the verification requirement if the emission report is based on data from Eurocontrol’s ETS Support Facility (ETS SF)?

Pursuant to Article 28a(6) of the Emissions Trading Directive, emission reports from aircraft operators with total annual emissions of less than 3,000 t CO₂ within the reduced geographical scope (see our homepage under “Scopes”), or less than 25,000 t CO₂ within the full geographical scope, are considered verified if they were generated entirely using ETS SF data.

In order to decide whether the threshold of 25,000 t CO₂ has been exceeded, all flights that take off **or** land within the EEA, including those that take off or land in Switzerland, must be taken into account in the same way as before. For the 3,000 t CO₂ threshold, all flights that take off **and** land in the EEA must also be taken into account as before, but now, in addition, flights from Switzerland to the EEA and from the EEA to Switzerland must be considered. Flights within Switzerland and from Switzerland to UK are not taken into account for any of the thresholds.

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/reduction-measures/ets.html

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

