



**ON: “Control of Air Pollution From Airplanes and Airplane Engines:
GHG Emission Standards and Test Procedures rule”**

TO: U.S. Environmental Protection Agency Public Hearing

**BY: Chuck Chaitovitz, Vice President, Environmental
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The Chamber’s mission is to advance human progress through an economic,
political and social system based on individual freedom,
incentive, initiative, opportunity and responsibility.

My name is Chuck Chaitovitz, and I am Vice President of Environmental Affairs and Sustainability at the U.S. Chamber of Commerce (“Chamber”). The Chamber appreciates the opportunity to provide input today on the important role of the aviation sector in the economy and in addressing climate change.

The Chamber supports the proposed “Control of Air Pollution From Airplanes and Airplane Engines: GHG Emission Standards and Test Procedures” rule, implementing carbon dioxide emissions standards for aircraft.

Completion of this rule is critical for the environment, the regulated industry, and the U.S. economy.

We thank EPA for your work on this standard, which is consistent with the standards agreed to by 190 countries and the UN International Civil Aviation Organization (ICAO).

A U.S. standard in alignment with the ICAO standards is an important step in creating a level international playing field for American airplane manufacturers, which means that aircraft designed and built in the U.S. should be more competitive in the global marketplace.

As you know, the COVID-19 pandemic continues to significantly impact the global economy and especially the aviation sector:

- The second quarter of 2020 saw the largest quarterly contraction of GDP in U.S. history of almost -32%. The economy has stopped contracting and is currently tracking to expand by about 23%, which would be the record high for growth in a quarter.
- However, not all industries are growing at the same rate. In fact, some are still contracting. This has given rise to the notion of a “K-shaped” recovery, in which some companies have had a sharp recovery – these represent the top side of the “K” – while for other companies the virus has kept them from operating at full capacity, or operating at all. These represent the bottom part of the “K.”
- The aviation industry is in the bottom of the “K” as airline traffic is still down significantly compared to before the pandemic. It will probably not rebound until the pandemic is fully over.

During these challenging economic times as businesses fight to recover from the pandemic, certainty in the regulatory landscape is more important than ever before.

We urge the Agency to finalize the rule by the end of 2020 to bolster economic growth and environmental stewardship, especially as our nation and the aviation sector recover from the economic and public health crises.

Commercial airplane manufacturing accounts for nearly 8% of total U.S. exports and supports more than 1 million U.S. jobs. Approximately 75% of the aircraft built here are sold overseas. Aviation also contributes significantly to global economic activity and employment. Before the pandemic, aviation flew more than 4 billion people and carried nearly \$7 trillion in goods every year while supporting 65.5 million jobs.

Implementing this regulation will also help ensure that older, less efficient airplanes are replaced by newer, more efficient models, thereby enabling aviation to continue growing sustainably and responsibly.

Today's aircraft are well over 70% to 80% more efficient than the first jets. Continued investment by manufacturers in new technologies will further improve efficiency and reduce emissions.

The ICAO standards are an important part of the industry's strategy to cut net global aviation carbon dioxide emissions to half of what they were in 2005 by 2050. These ambitious emission standards would formalize technology improvements into the airplane certification process that, until now, have been purely voluntary.

In conclusion, when finalized this critical rule promises to provide equipment manufacturers with predictability, a critical component to getting back on their feet and to reducing emissions in the most cost-effective way, while maintaining their competitiveness in world markets.

Thank you again. We stand ready to assist in finalizing this rule.

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