

October 13, 2020

Office of Transportation and Air Quality Assessment and Standards Division (ASD)  
U.S. Environmental Protection Agency  
2000 Traverwood Drive, Ann Arbor, MI 48105

**Re: National Business Aviation Association comments on the EPA Proposed Rule Control of Air Pollution from Airplanes and Airplane Engines: GHG Emission  
Docket ID No. EPA-HQ-OAR-2018-0276**

The National Business Aviation Association (NBAA) welcomes the opportunity to provide comments to this Environmental Protection Agency (EPA) Notice of Proposed Rulemaking (NPRM) on Airplane Greenhouse Gas Emission Standards. NBAA represents the interests of over 11,000 members who use aviation to support their business. These members include companies who operate, repair, service, and manufacture aircraft; that later which will be directly affected by this proposed rule.

Our Member companies utilize aircraft to reach a wide diversity of locations in the United States 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. The value of business aviation is most prevalent in times of crisis. The current COVID-19 pandemic has seen organizations across the globe use business aviation to move passengers and patients to keep the economies of the world moving.

### **Business Aviation's Commitment to the Environment**

Business aviation is consistently at the forefront of aviation technology in a manner that is both innovative and environmentally responsible. NBAA and our Member companies have long supported local, regional, and global efforts to address aircraft emissions. In 2009 business aviation manufacturers and service providers, represented by the General Aviation Manufacturers Association (GAMA), and business jet operators, represented by the International Business Aviation Council (IBAC), jointly announced the Business Aviation Commitment on Climate Change.<sup>1</sup> This aggressive program is designed to address the industry's carbon emissions by meeting the three following targets:

#1: Improving fuel efficiency 2% per year from 2010 until 2020

#2: Achieving carbon-neutral growth from 2020

#3: Reducing CO<sub>2</sub> emissions 50% by 2050 relative to 2005

A 2015 review of the progress indicated that we were on track to achieve the first of these three goals; improved fuel efficiency by 2% per year from 2010 to 2020. As a member of IBAC, NBAA is active in the Committee on Aviation Environmental Protection (CAEP) work. This includes the efforts that lead to the adoption of airplane carbon dioxide (CO<sub>2</sub>) standards by ICAO in 2017.

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<sup>1</sup> IBAC/GAMA Business Aviation Commitment on Climate Change: [https://ibac.org/wp-content/uploads/2016/07/GAMA-IBAC\\_Environment\\_Brochure.pdf](https://ibac.org/wp-content/uploads/2016/07/GAMA-IBAC_Environment_Brochure.pdf)

As noted in this proposed rule, the need for a single global standard is vitally important to promoting international harmonization. NBAA fully supports this mindset and would like to identify key subject areas that we submit for reconsideration.

### **Reporting Requirements**

The request to submit annual production numbers is not included in the ICAO CO<sub>2</sub> standards. Should it be decided that this information is necessary, it can be obtained using public data sources. An additional area of difference is concerning the requirement to submit Reference Geometric Factor (RGF) data. The omission of RGF data in the ICAO CO<sub>2</sub> standard was deliberate, after careful consideration of concerns from manufacturers. The CO<sub>2</sub> Standard metric consists of a mathematical calculation using three Specific Air Range (SAR) points and the RGF. Specific Air Range information is a definition of the fuel burn of a product and is considered highly commercially sensitive. We feel that this information should then be identified as Confidential Business Information (CBI). However, should this not be the case, and the information made publicly available, it would be possible to calculate the SAR. NBAA suggests that the RGF data be excluded from the reporting requirements or be identified as CBI.

### **Special Mission Aircraft**

Due to the extraordinary capability and versatility of business aviation aircraft, they are often selected as platforms for special mission aircraft operated by various organizations and states. The roles for special mission aircraft regularly require modifications to the original Type Certificate (TC). NBAA supports language that would exclude these few unique aircraft, as identified in the proposed rule.

### **Summary**

There are few subject areas that a global policy position is more important than that surrounding environment. Moving forward with this proposed rule will demonstrate that the EPA supports this viewpoint. Aside from these few identified areas, NBAA supports the EPA's decision to implement this important rule. We applaud the EPA for continuing this work and taking the action to adopt the ICAO CO<sub>2</sub> standard. The business aviation community remains committed to improving our sector's environmental performance through a variety of operational, technical and policy measures. We look forward to working with the EPA in these areas and are thankful for the opportunity to submit these comments on behalf of NBAA members. Please contact me at 202-361-6435 or [sdleon@nbaa.org](mailto:sdleon@nbaa.org) if NBAA can provide any additional information.

Sincerely,



Stewart J. D'Leon  
Director, Technical Operations