Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)
Frequently Asked Questions
Last Updated: 7/24/23

Q: CORSIA has two voluntary phases (i.e., the 2021-2023 “Pilot Phase” and the 2024-2026 “First Phase”) and a mandatory phase (i.e., the 2027-2035 “Second Phase”). Currently, the FAA CORSIA Monitoring, Reporting and Verification (MRV) Program is being administered on a voluntary basis. So what is really voluntary and mandatory?

A: According to the CORSIA Standards and Recommended Practices (SARPs), ICAO Member States may choose whether to participate in the two CORSIA voluntary phases. The United States, as an ICAO Member State, has volunteered to participate in the CORSIA voluntary phases, meaning the United States must report all subject emissions, and where appropriate, emissions unit cancellations, for U.S. operators that are subject to the requirements of the CORSIA SARPs.

According to the FAA CORSIA MRV Program, U.S. operators may choose whether to voluntarily participate in the MRV requirements of the CORSIA SARPs. The FAA CORSIA MRV Program includes Emissions Monitoring Plan (EMP) reporting, and annual Emissions Report (ER) reporting that covers the original 2019 and 2020 baseline years, as well as emissions reporting for the Pilot Phase (2021-2023) and First Phase (2024-2026) of CORSIA. While U.S. operators may choose not to voluntarily report their emissions by participating in the FAA CORSIA MRV Program, the United States will estimate emissions data for any U.S. operators that do not participate and report that data to ICAO to ensure the United States complies with the CORSIA SARPs.

Data collected from the CORSIA MRV Program may be used to inform any potential regulations or other initiatives that might be developed in the future. To date, the CORSIA MRV Program covers over 98 percent of U.S. emissions subject to the CORSIA SARPs, and includes participation of all major U.S. operators.

Q: Who can participate in the FAA CORSIA Program?

A: The CORSIA SARPs are applicable to all airplane operators that produce annual CO2 emissions greater than 10,000 tonnes (i.e., 10,000 metric tons) from international flights, excluding emissions from excluded flights. U.S. operators who are outside this scope of applicability are welcome to participate in the program; however, the emissions from these operators will not be included in the U.S. information that is reported to ICAO.

Q: What is the role of CORSIA in the U.S. 2021 Aviation Climate Action Plan

A: The U.S. 2021 Aviation Climate Action Plan prioritizes emissions reductions from new airplane and engine technology, improvements in operational efficacy - including NextGen air traffic management and infrastructure; and the use of Sustainable Aviation Fuel (SAF).

CORSIA, and emissions offsetting generally, are considered to be “gap fillers” in the U.S. 2021 Climate Action Plan. The use of high-integrity emissions offsets are expected to help address any remaining in-sector emissions reductions that may be needed before the sector is able to shift to net-zero fuels.

Q: What is the role of sustainable aviation fuel (SAF) in CORSIA?

A: Sustainable Aviation Fuel (SAF) and Lower Carbon Aviation Fuel (LCAF) are two types of CORSIA Eligible Fuels (CEF) with lower lifecycle emissions than conventional jet fuel. Operators that purchase either SAF or LCAF may report the emissions reduction from these fuels in their annual CORSIA Emissions Report.

Q: Are operators required to purchase SAF under CORSIA?

A: No, operators are not required to purchase SAF under CORSIA. Operators can choose to use SAF as a means to reduce their reported emissions, similar to how they can choose to acquire new airplanes or invest in aircraft upgrades to reduce airplane emissions, thereby reducing their resulting CORSIA offsetting obligations.

Q: Can SAF used to comply with a national mandate (e.g., in France) be reported under CORSIA?

A: Emissions reductions from the purchase of SAF may be reported under CORSIA irrespective of any domestic SAF incentives or mandates that may have been used to support its production. However, operators cannot claim SAF emissions reductions under CORSIA in instances where the associated emissions reductions have been sold to a third party or where the SAF has been reported under another greenhouse gas emissions reporting schemes.

Q: Can the same CORSIA Eligible Fuel be claimed by different parties in different GHG programs?

A: Per Annex 16, Volume 4, paragraph 2.3.3.2: “The aeroplane operator shall provide a declaration of all other GHG schemes it participates in where the emissions reductions from the use of sustainable aviation fuels may be claimed, and a declaration that it has not made claims for the same batches of sustainable aviation fuel under these other schemes.”

For CORSIA, “other GHG schemes” refers to mandatory GHG emission reduction programs other than CORSIA in which the aeroplane operator can reduce its quantified emissions through the use of CEF. (see ICAO Doc. 9501, CORSIA ETM, pg. 3-46). An example of this is if an aeroplane operator is subject to compliance with both CORSIA and the EU Emissions Trading Scheme (EU ETS). Under this example, the aeroplane operator could not claim CORSIA eligible fuel against both GHG emission reduction programs and instead would elect to take those benefits through CORSIA or the "other GHG scheme."

Q: Are CORSIA Eligible Fuels (CEF) claimed under CORSIA eligible for stacked incentive credits issued under other programs?

Yes. The stacking of incentives for renewable fuels is well established and accepted, having been applied in practice for road transport in the United States for the Renewable Fuel Standard, Biodiesel Blenders Tax Credit, and California Low Carbon Fuel Standard (LCFS) for several years.

GHG emissions reductions claimed in CORSIA through the use of CEF are not affected by stacking potential incentives. Thus, an operator could claim the emission reduction benefits in CORSIA through the use of CEF, which also utilizes incentives from the U.S. EPA's Renewable Fuel Standard, the Biodiesel Blenders Tax Credit, and the California Low Carbon Fuel Standard (LCFS). From a CORSIA standpoint, there is no restriction on the stacking of incentives.