



Council of the European Union  
General Secretariat

Brussels, 11 March 2022

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**Interinstitutional files:**

2021/0211 (COD)

2021/0207 (COD)

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WK 3525/2022 INIT

LIMITE

CLIMA

ENV

AVIATION

ENER

TRANS

COMPET

ECOFIN

CODEC

**DOCUMENT PARTIALLY  
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## CONTRIBUTION

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From:	General Secretariat of the Council
To:	Working Party on the Environment

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N° prev. doc.:	WK 3189/2022
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Subject:	Fit for 55 package - ETS: Comments from a delegation
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Following the call for comments on the above set out in WK 3189/2022 regarding ETS aviation (cluster 3), delegations will find attached comments from the FI delegation.

## FINLAND

### Written comments on the proposal for amending directive 2003/87/EC (ETS Aviation)

#### 1. ETS and CORSIA scopes

[REDACTED]

[REDACTED]

[REDACTED]

Finland is in favor of the proposal to limit the ETS exemption of flights to and from the outermost regions to national flights. Considering EU climate ambition it is justifiable that also these national flights are included in the ETS after the proposed transition period.

## 2. Phasing out free allowances

[REDACTED]

We also, once again, call for more in-depth impact analysis on aviation proposals taking into consideration the radically changed operational environment and its effects on member states.

[REDACTED]

[REDACTED]

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