

US-Citizens Aviation Watch Association

a not-for-profit corporation

"Protecting the public's health, environment, property and promoting safety."

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November 27, 2001

Mr. Kofi A. Annan
Secretary-General
United Nations
New York, New York 10017

Dear Secretary-General Annan:

In response to letters from Patrizio Civili dated November 12, 2001 and Gene Griffiths dated November 5, 2001, which responded to our original September 28, 2001 letter, we are writing again to express our deep disappointment in the most recent standards and recommendations adopted by the International Civil Aviation Organization (ICAO), and to share with you our testimony for the November 14, 2001 U.N. Environment Programme Aviation Workshop held in Paris. The ICAO's latest standards will allow the grave, worldwide, harmful impacts of the air transport industry on public health, safety, welfare, and the environment to continue unabated. These standards include a new, extremely weak "Chapter 4" aircraft noise standard that will continue to allow noisy planes to fly, a complete lack of any improved standards for protecting public health, air, land, and water from aviation pollution, and a complete lack of any standards to control the climate-changing nature of toxic jet emissions.

Airport and aircraft operations generate staggering amounts and various types of toxic air, noise, ground, and water pollution in major population centers, which include tens of thousands of pounds of known human carcinogens emitted around each major airport. The health of seventy percent (70%) of the U.S. population could already be significantly affected. Yet, despite the compelling evidence of serious health and environmental damage that the air transport industry is causing (please refer to our enclosed submission to the Environment Programme Aviation Workshop), the ICAO has once again provided little or no progress in protecting us from it.

Advocating a sustainable, equitable and accountable aviation industry.

Contrary to Mr. Griffiths' characterization in his letter to us that the consensus conclusion reached on "the difficult question of operations restrictions on the noisiest Chapter 3 aircraft" represents a "breakthrough," all of the ICAO's new noise standards represent a negligible reduction in aircraft noise. The new "Chapter 4" noise standard requires only a 10 decibel reduction in noise from jet engines that would apply only to production of new planes after 2006. Environmental advocates and even airport managers had called for ICAO to set the new standard at a 14-18 decibel reduction for all planes, including existing ones, by 2006. One group, the International Coalition for Sustainable Aviation, believed the Chapter 4 standard needed to be reduced further, by 30 decibels by the year 2020. Because the new standard applies to the cumulative sum of noise from each individual take-off, landing, and sideline noise event, and not to individual noise events (how the person perceives and is affected by noise), any noise reduction for planes produced after 2006 would most likely be imperceptible. Further, all existing Chapter 3-certified aircraft will meet the new limit without any further noise reduction action, and therefore may be "re-certified" to meet the new "Chapter 4" standard. So most existing noisy aircraft, which are effectively "grand-fathered" in under the even weaker "Chapter 3" standard, will be allowed to fly for the next thirty years.

The ICAO also made no changes to any aircraft emissions specifications, leaving in place provisions that are at least a decade old, and completely failing to reduce the tons of toxic and carcinogenic aircraft exhaust emitted per flight. See, for example, one exhibition of this problem, the ICAO's policy in Appendix I, 2, b of its October 2001 "Report on Agenda Item 14":

Urges States to refrain from unilateral action to introduce emission-related levels inconsistent with the current guidance.

These weak resolutions represent the failed "market" approach of cost-benefit calculations of the airline industry-dominated ICAO. These calculations totally disregard the true costs of air industry-caused environmental degradation, global climate change, lost productivity and increased healthcare costs from air-industry caused noise and disease, other social problems, pain and suffering from noise and disease, and premature deaths from the almost unregulated, toxic and carcinogenic jet emissions and other air transport industry related problems. These all are "externalities," that is, actual costs being incurred from the air transport industry's operations but which are not taken into account in the current price of its operations. See, for example, the following exhibitions of this problem, the ICAO's policy in Appendix A of its October 2001 "Report on Agenda Item 14":

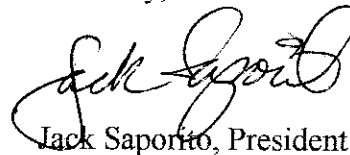
5. Urges States to refrain from unilateral environmental measures that would be harmful to the development of international civil aviation.

See also, the same document, Appendix D:

4. Urges States not to introduce measures to phase-out aircraft which comply, through original certification or recertification, with the noise certification standards in Volume I, Chapters 3 or 4 of Annex 16,
- and;
5. Urges States not to impose any operating restrictions on Chapter 3 compliant aircraft, except as part of the balanced approach to noise management developed by ICAO and in accordance with Appendices C and E to this Resolution.

We ask for your assistance in beginning to honestly face and examine the very serious problems posed by the world-wide air transport industry, and in working together to find solutions. Thank you very much for your time and attention to these very important matters.

Sincerely,



Jack Saporito, President

c: Patrizio Civili, Assistant Secretary-General
for Policy Coordination and Inter-Agency Affairs

Gene Griffiths, Chief, ICAO External Relations and Public Information Office

- encl.: 1) Comments of US-Citizens Aviation Watch Association for United Nation Environment Programme, Aviation Workshop, Paris, France, November 14, 2001
- 2) Press Release, "UN Protects Air Transport Industry, Not Human and Environmental Health"