

**October 20, 2020**

**ATTORNEY GENERAL RAOUL URGES FEDERAL GOVERNMENT TO STRENGTHEN STANDARDS  
REGULATING GREENHOUSE GAS EMISSIONS FROM AIRPLANES**

**Chicago** — Attorney General Kwame Raoul today, as part of a coalition of 12 attorneys general, filed comments urging the U.S. Environmental Protection Agency (EPA) to strengthen standards regulating greenhouse gas (GHG) emissions from airplanes and other aircraft. Recently, the EPA put forward an insufficient proposal that would not reduce greenhouse gas emissions from airplanes. [In the comment letter](#), Raoul and the coalition argue that this proposal fails to fulfill the EPA's obligations under the Clean Air Act and must be abandoned in favor of stronger standards.

"The EPA's proposal fails to control greenhouse gas and carbon dioxide emissions from the airline industry," Raoul said. "I am committed to protecting the health of Illinois residents and the environment from the disastrous causes of climate change."

Aviation emissions are a significant source of the world's total GHG emissions, and the United States is the single largest emitter. Globally, the aviation industry is responsible for approximately 2.4 percent of all carbon dioxide emissions and 12 percent of GHG emissions from all transportation sources. The United States contributes more than a quarter of global aviation GHG emissions, and its emissions from aircraft alone are higher than total GHG emissions in more than 150 countries. GHG emissions from U.S. aircraft are expected to grow 43 percent in the next two decades, and globally, aviation emissions are expected to triple by 2050 unless governments and industry take aggressive action.

Section 231 of the Clean Air Act authorizes and directs the EPA to issue appropriate emission standards for dangerous pollutants from aircraft engines based on a reasonable assessment of aircrafts' contribution to GHG emissions and the technological feasibility of emissions controls. Strengthening emission standards now would not only benefit public health and the environment, but will lead to fuel savings in future decades that can recoup the cost of developing new technology or be passed on to the consumer through lower ticket prices. However, the EPA has proposed standards that lag behind existing technology by more than 10 years and would result in no GHG reductions compared to business-as-usual. The EPA has not considered any form of emission control that would reduce GHGs, despite its determination that these emissions endanger public health and the environment. The EPA also fails to consider the co-benefits of GHG regulation and the environmental justice impacts of pollution from aircrafts in its proposal.

In the comment letter, Raoul and the coalition urge the EPA to strengthen standards regulating GHG emissions for aircrafts, arguing that the proposed standards are unlawful because:

- The EPA must take into account, at the very least, the danger of GHG emissions and the technological feasibility of emissions control in exercising its discretion to promulgate "appropriate" emission standards under Section 231 of the Clean Air Act.
- Failure to consider any options that reduce greenhouse gas emissions violates Section 231 of the Clean Air Act and is arbitrary and capricious.
- The United States' obligations under the Chicago Convention do not excuse the EPA's failure to protect the United States from dangerous pollution.

Joining Raoul in filing the comment letter are the attorneys general of California, Connecticut, the District of Columbia, Maryland, Massachusetts, Minnesota, New Jersey, New York, Oregon, Vermont and Washington, as well as the California Air Resources Board.