T&E response to the public consultation on the Flight Emissions Label

The proposed Flight Emissions Label is a missed opportunity to allow consumers to make truly informed choices.

While Transport & Environment welcomes the Label as an opportunity to provide greater transparency in aviation emissions, the proposed Implementing Act has several issues:

- **The non-CO_2 effects of aviation are yet again hidden from passengers.**
- **The proposed method to apportion emissions to belly cargo would hide an additional 4 Mt of CO_2 from European consumers, equal to 4% of all passenger emissions.**
- **CO_2 efficiency per kilometre is not a relevant indicator to assess the environmental impact of a flight.**
- **Comparing the emissions of a given flight only to emissions of other flights on the same route is misleading whenever a train alternative is available.**
- **Passengers should be given more information about SAF than its life cycle emissions.**

On 22 September 2024, the European Commission released a draft Implementing Act for the Flight Emissions Label, in application of the Regulation (EU) 2023/2405 of 18 October 2023 on ensuring a level playing field for sustainable air transport (ReFuelEU Aviation).

While T&E welcomes the intention “to enable consumers to make informed choices regarding flights and other alternative modes of transport”, the proposed regulation suffers from several issues which prevent it from achieving that objective.

Not including the non-CO_2 effects of aviation in the scope of the Label conceals from passengers a significant part of the climate impact of their flights.

The best available science estimates that non-CO_2 effects warm the planet at least as much as the carbon emissions from aviation. Although their precise quantification may differ depending on the models and assumptions used, their complete omission from the Flight Emissions Label is unfortunate and hides relevant information that would enable more conscious climate choices from passengers.

This is particularly true for multimodal emissions comparison. Not including non-CO_2 effects hides part of aviation's climate impact, unfairly benefitting it vis a vis other transport modes, such as rail. Not displaying this information also penalises those leading aircraft operators taking steps to reduce their non-CO_2 impact.

Being conscious of the current state of play of aviation emissions reporting and quantification, T&E would like to propose the following 2-step approach:

1. From the launch of the Flight Emissions Label: provide information describing the nature and impacts of non-CO_2 effects, to raise consumer awareness.
2. From 2026: provide quantitative information of the non-CO_2 climate impact of flying. The quantification can be based on a combination of EU ETS Non-CO_2 MRV scheme data, and on models currently under development by the industry. Non-CO_2 climate impacts may be quantified for each airport pair + aircraft operator + aircraft type, and may also include factors such as time and date of the flights.

CO_2 efficiency per kilometre does not allow passengers to make “informed choices”.

Article 14 of ReFuelEU stipulates that the indicators of the Label must include the expected CO_2 efficiency per kilometre, alongside the expected carbon footprint per passenger. CO_2 emissions per passenger-kilometre are a misleading metric to assess the climate impact of a flight, as they can be negatively correlated to flight distance[1]. In other words, the longer the route, the

[1] Aviation Impact Accelerator. (2024). Five Years to Chart a New Future for Aviation. p.21.

better the CO_2 efficiency, but the higher the absolute flight emissions. Total CO_2 emissions is the only criteria that matters to assess the environmental impact of a flight.

T&E welcomes the decision to remove CO_2 emissions per passenger-kilometre from the primary display of the Label, although it is still included in the secondary display.

The method proposed to apportion emissions to belly cargo would hide emissions from passengers.

Air freight accounted for an estimated 15% of CO_2 emissions by commercial aviation in 2019. 57% of freight was belly cargo, transported in the belly of passenger aircraft. A correct apportionment of emissions on those dual purpose flights, which carry both passengers and cargo, is essential.

The Flight Emissions Label proposes the use of an equal mass apportionment of emissions, assuming a mass of 100 kg per passenger. This approach does not consider the weight of the cabin furnishing needed for passenger transport, such as seats, galleys or lavatories. As a result, part of the emissions that should be allocated to passenger transport are incorrectly apportioned to belly freight.

The ICCT has estimated that applying the proposed equal mass approach would inadvertently hide an additional 4 million metric tons of carbon dioxide (CO_2), equal to 4% of all passenger emissions, from European consumers.

Furthermore, this approach provides inconsistent accounting methods for freight emissions, penalising belly cargo compared to dedicated freight.

T&E recommends the use of a 50 kg per seat furnishings correction factor when apportioning emissions to belly cargo, instead of using the equal mass approach as currently proposed. For more information, please refer to the ICCT public consultation response.

Average emissions by train would be a better benchmark than average flight emissions for routes where a train alternative exists.

The current proposal stipulates that the primary display of the Label must include the relative difference, in percentage, between the expected cabin emissions per passenger (or the expected freight emissions per tonne) and “the average emissions of the aircraft operators operating the route in question”. Limiting that comparison to aviation emissions is a missed opportunity to make that Label an instrument to guide passengers towards other, less polluting, options of mobility.

T&E recommends that the expected carbon footprint per passenger is not only compared to average emissions by plane for a given route, but also to average emissions by rail, when the alternative exists.

SAF accounting methodology: T&E supports the use of RED and CORSIA accounting frameworks for consistency with Union Law and international standards, but consumers should be given access to more information about SAF.

The proposed regulation states that life-cycle emissions of aviation fuels will be calculated in accordance with the Renewable Energy Directive methodology (Directive (EU) 2018/2001) and, where relevant, the CORSIA framework. T&E supports this approach for consistency with EU law and international standards.

However, life cycle analysis is an imperfect tool that does not tell passengers everything about the sustainability of a fuel[2]. For instance, it does not say anything about the feedstocks used to produce the SAF used on a given flight, or their origin, and whether these feedstocks could have been better deployed elsewhere.

T&E recommends that the secondary display of the Label includes as much information as possible regarding the feedstocks used to produce the SAF used on a given flight. Consumers should be able to easily access that information, which should be provided by the airlines through this label. The flight emissions website should also include information about what SAFs are.

Additionally, T&E would like to draw the Commission's attention to the following points:

- The use of the colour green for the logotype to be used against light-coloured backgrounds is misleading and should be avoided.
- The fact that the Flight Emissions Label is a voluntary scheme could result in underestimating the environmental impact of flying if only airlines with better environmental records (due to using more SAF, for instance) decide to apply. For this reason, T&E believes the Flight Emissions Label should become mandatory as of 2027.

[2] Dr Chris Malins and Dr Cato Sandford. (September 2023). *Scrutinising the future role of alternative fuels in delivering aviation decarbonisation.* Part I - Life Cycle Analysis.

Key recommendations

1	Provide information on non-CO2 effects, first describing the impacts from the start of the program, and then quantifying them by 2026 with the support of the best available models and EU ETS data.
2	Use a correction factor of 50 kg/passenger for cabin furnishings, to better apportion emissions between passenger and belly freight.
3	Whenever relevant, use average emissions by rail on the same route as an additional benchmark, alongside average emissions by other aircraft operators.
4	Provide as much information as possible regarding the feedstocks used to produce the SAF used on a given flight.
5	Keep CO_2 efficiency per kilometre out of the primary display of the label.

Annex: European routes with the highest contrail climate impact

Ranking	Airport Pair	Airport 1	Airport 2	Included in reduced MRV scope?
1	AMS-PVG	Amsterdam Airport Schiphol (Netherlands)	Shanghai Pudong International Airport (China)	No
2	LUX-HKG	Luxembourg-Findel International Airport (Luxembourg)	Hong Kong International Airport (Hong Kong)	No
3	FRA-ICN	Frankfurt am Main Airport (Germany)	Incheon International Airport (South Korea)	No
4	CDG-PVG	Charles de Gaulle International Airport (France)	Shanghai Pudong International Airport (China)	No
5	FRA-PVG	Frankfurt am Main Airport (Germany)	Shanghai Pudong International Airport (China)	No
6	CDG-JFK	Charles de Gaulle International Airport (France)	John F Kennedy International Airport (United States)	No
7	MXP-JFK	Malpensa International Airport (Italy)	John F Kennedy International Airport (United States)	No
8	CDG-HND	Charles de Gaulle International Airport (France)	Tokyo Haneda International Airport (Japan)	No
9	CDG-ICN	Charles de Gaulle International Airport (France)	Incheon International Airport (South Korea)	No
10	CDG-PEK	Charles de Gaulle International Airport (France)	Beijing Capital International Airport (China)	No
11	LUX-CGO	Luxembourg-Findel International Airport (Luxembourg)	Zhengzhou Xinzheng International Airport (China)	No
12	AMS-JFK	Amsterdam Airport Schiphol (Netherlands)	John F Kennedy International Airport (United States)	No
13	AMS-HKG	Amsterdam Airport Schiphol (Netherlands)	Hong Kong International Airport (Hong Kong)	No
14	MAD-JFK	Adolfo Suárez Madrid–Barajas Airport (Spain)	John F Kennedy International Airport (United States)	No
15	CDG-SVO	Charles de Gaulle International Airport (France)	Sheremetyevo International Airport (Russia)	No
16	MAD-MIA	Adolfo Suárez Madrid–Barajas Airport (Spain)	Miami International Airport (United States)	No
17	FCO-JFK	Leonardo da Vinci–Fiumicino Airport (Italy)	John F Kennedy International Airport (United States)	No
18	MAD-BOG	Adolfo Suárez Madrid–Barajas Airport (Spain)	El Dorado International Airport (Colombia)	No
19	CDG-ATL	Charles de Gaulle International Airport (France)	Hartsfield Jackson Atlanta International Airport (United States)	No
20	CDG-HKG	Charles de Gaulle International Airport (France)	Hong Kong International Airport (Hong Kong)	No
21	MXP-ICN	Malpensa International Airport (Italy)	Incheon International Airport (South Korea)	No
22	ORY-PTP	Paris-Orly Airport (France)	Pointe-à-Pitre Le Raizet (Guadeloupe)	Yes
75	HEL-MUC	Helsinki Vantaa Airport (Finland)	Munich Airport (Germany)	Yes

Source: Transport & Environment, based on data by Teoh et al. (2024) and OAG (2024) for the year 2019 • Routes (cargo+passenger) include return flights, except for flights between the EEA and the UK and Switzerland where outbound and inbound flights are listed separately.