



InfluenceMap

Aviation Industry Lobbying & European Climate Policy

How the aviation industry has lobbied to weaken and delay climate regulation

June 2021

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Executive Summary

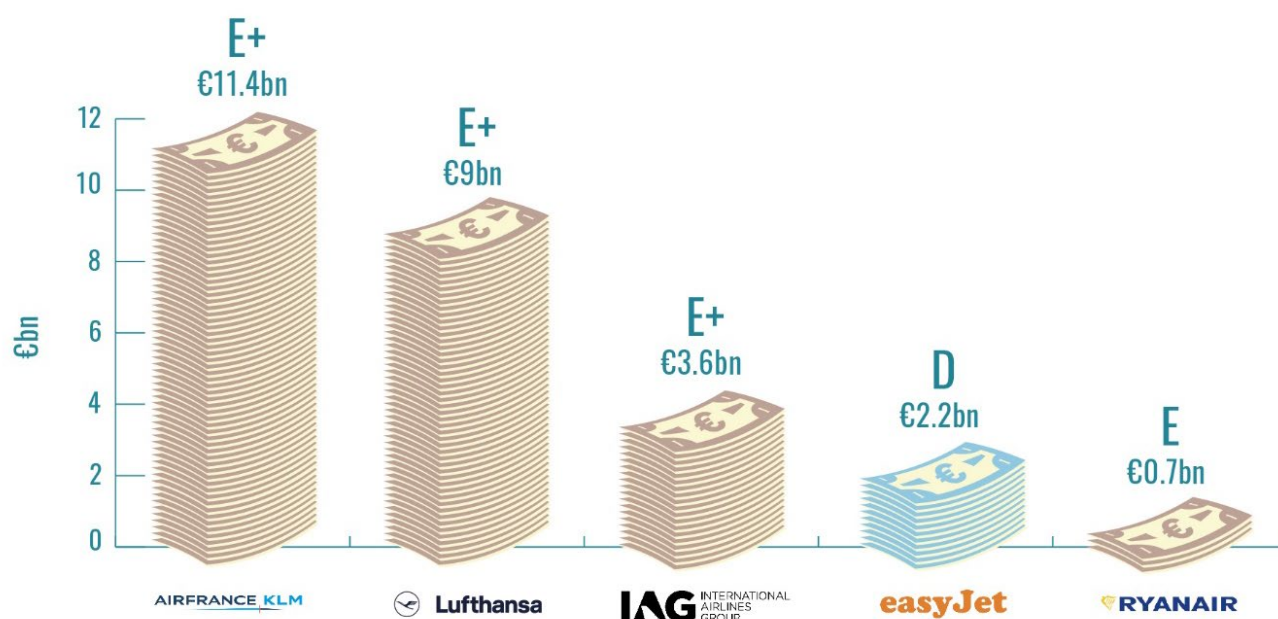
- New research shows the aviation sector has emerged as one of the strongest opponents of climate policy in Europe. While many industrial sectors are in the process of transformation in response to the EU's strengthened climate agenda, the aviation sector has instead pursued a lobbying strategy to avoid effective regulation. The research further shows that many airlines have initiated extensive, climate-focused PR campaigns to deflect growing concern from governments and the public over the sector's climate footprint. At the same time, the ten airlines covered by the study have accepted **around €30bn in government bailouts** since the beginning of the Covid-19 crisis.
- The research highlights a threat to the EU's climate targets if the aviation sector's emissions are allowed to grow at pre-COVID-19 trajectories, with European GHG emissions from aviation more than doubling from 1990-2018. This is significant given the EU Commission will announce its key policies to decarbonize aviation as part of the **European Green Deal** in July 2021. The findings will be of particular interest to European investors who, through the **Climate Action 100+ aviation sector strategy**, have recommended that the sector engages with national, regional, and international climate policy in a way that is consistent with the goals of the Paris Agreement.
- The analysis draws from InfluenceMap's platform which assesses policy engagement against Paris-aligned government and science-based benchmarks, covering over 300 companies and 150 industry associations globally. This research covers the 10 largest European airline companies by GHG emissions, along with the two largest global aircraft manufacturers (Airbus and Boeing) and two key industry associations (International Air Transport Association and Airlines for Europe). It involved the collection and analysis of around 800 individual items of evidence on climate policy engagement, with nearly 60% of these dated since 2020. This includes a significant amount of previously unseen information, accessed from over 20 freedom of information requests by InfluenceMap.

European Airlines Compared on Climate Policy Engagement

- Negative climate lobbying efforts appear to be led (with their climate policy engagement scores in brackets on a scale of A to F) by **Air France-KLM (E+)**, **International Airlines Group (IAG) (E+)**, **Lufthansa (E+)**, and **Ryanair (E)**, the four European airlines with the largest disclosed CO₂ emissions in 2019. They are joined by two main aviation industry groups, **International Air Transport Association (IATA) (E+)**, and **Airlines for Europe (A4E) (E+)**. Collectively, these entities have actively opposed key national and EU aviation climate policies including the full inclusion of aviation in the EU Emissions Trading System (EU ETS), kerosene fuel taxes, and ticket taxes on flights.
- In contrast, **easyJet (D)** appears to have a more mixed stance, with more progressive positions on numerous EU climate policies including a kerosene fuel tax. The other five largest airlines by disclosed CO₂ emissions (**Virgin Atlantic**, **Scandinavian Airlines SAS**, **TAP Air Portugal**, **Norwegian Air Shuttle**

ASA, and Wizz Air) appear to have very limited direct engagement with climate policy, but most retain memberships of Airlines for Europe and/or IATA. As do both **Boeing (D-)** and **Airbus (D)** where there is likewise limited transparency on EU policy engagement positions and activities, despite the significance of the two companies to delivering a low-carbon transition for aviation (collectively they represent *around 99% of global large plane orders* and 90% of the worldwide plane market).

COVID-Related Bailouts to Airlines and Climate Policy Scores



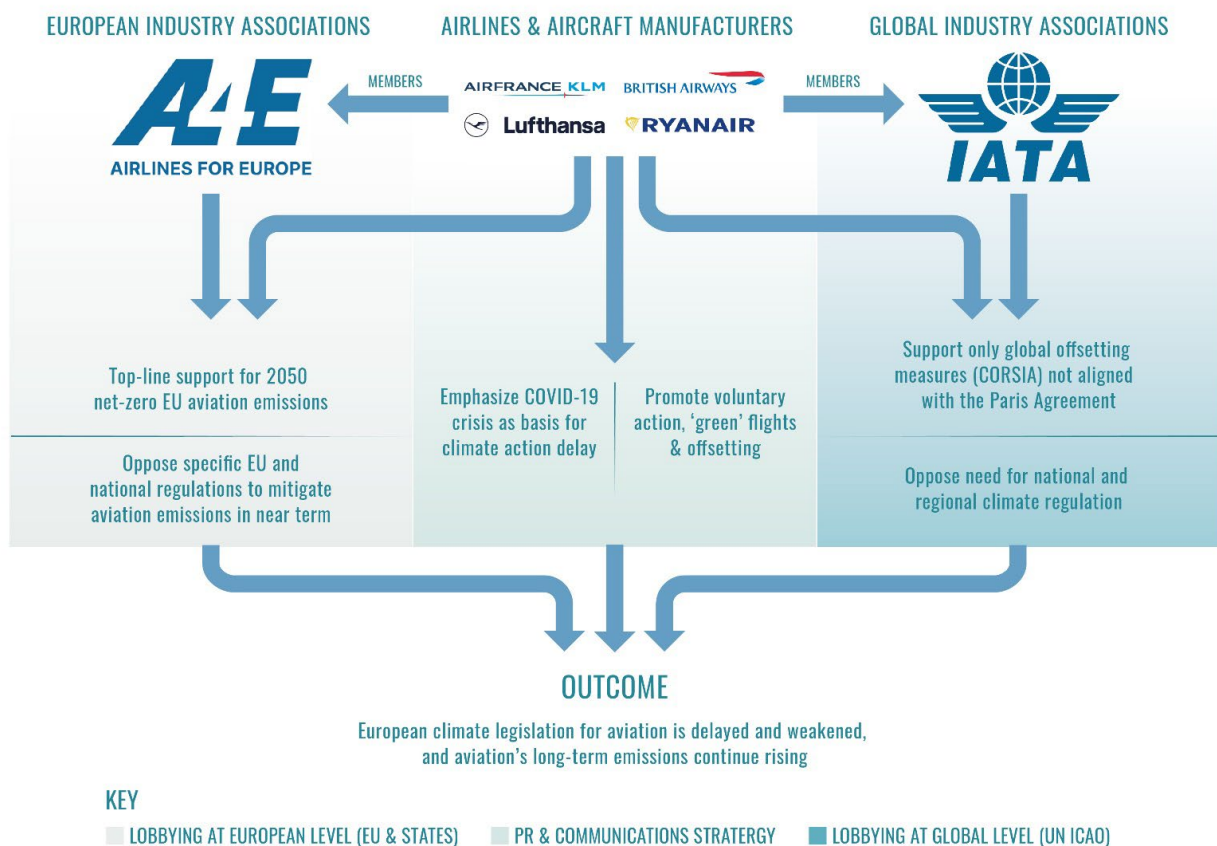
Climate policy organization score on A - F scale, with A being fully supportive and F being fully opposed

- Negative aviation lobbying presents a clear risk to science-based policy required in Europe to reach the temperature goals of the Paris Agreement, as recently detailed in the scenarios of the *IPCC 1.5C* and *IEA Net Zero by 2050* reports. The sector's positions also seem at odds with EU policymakers, as Europe's climate goals could be undermined by a sector refusing to contribute its fair share. The UN Principles for Responsible Investment considers corporate misalignment with 'inevitable' regulatory measures on climate a *critical source of market risk*, likely to build in 2023-25 as governments accelerate policy action.
- It is likely far that more forceful engagement by investors on the aviation sector will be needed, given their apparent strategic opposition to all EU and European regulatory measures to achieve medium-term and long-term climate targets. This may include a focus by investors on the use of shareholder resolutions should progress not be forthcoming, with climate lobbying resolutions already filed in 2021 to United Airlines and Delta Air Lines (see InfluenceMap's response [here](#)) in the US. The latter is a key trend within investor stewardship of companies on climate, and the aviation sector will likely be in focus here.

The Lobbying Strategy of Europe's Aviation Sector

- This research identifies a two-point strategy used by the sector to avoid regulation directly addressing their climate emissions. Firstly, at a European level, the industry has communicated high-level support for net-zero EU aviation emissions by 2050 while opposing specific national and EU-level climate regulations to help deliver that target in their direct engagements with policymakers. Secondly, at a global level through the UN body for aviation, the International Civil Aviation Organization (ICAO), industry has lobbied for the CORSIA offsetting scheme to take precedent over policies addressing absolute aviation emissions reductions. At the same time, using the context of the COVID-19 pandemic, industry lobbyists have successfully pushed for the scheme to be watered down further.

The Aviation Sector's Climate Policy Strategy Explained



- In Europe, this climate policy engagement has been led by Airlines for Europe (A4E) which *has pushed* for the EU ETS for intra-EU flights to be replaced with a hybrid CORSIA-EU ETS scheme, while *opposing efforts* to increase the EU ETS scope to all international flights to and from the EU. In contrast, *European Commission research* has found that CORSIA was "unlikely to materially alter the direct climate impact associated with air travel." In other 2020 EU consultation responses, A4E appeared *opposed* to a jet fuel tax and *unsupportive* of a stringent EU sustainable aviation fuels (SAF) mandate.

- At a global level, the International Air Transport Association (IATA) has opposed the need for *regional and national climate regulations* for aviation and urged ICAO to prioritize the *CORSIA offsetting scheme*. At the same time, IATA *led efforts* at ICAO to weaken CORSIA in 2020 after a pandemic-driven decline in air travel. New evidence uncovered in an FOI request shows that IATA also *lobbied* EU officials at a private meeting in April 2020 to support such a change, later agreed by ICAO in June 2020.
- The five largest European airlines, IATA, A4E, and the aircraft manufacturers Boeing and Airbus have a collective annual EU lobbying expenditure of around **€6.75 million** according to their most recent disclosures to the *European Transparency Register*. However, this figure represents only a proportion of their overall climate-related policy engagement spend. It excludes expenditure on national level lobbying and other climate influencing activities (e.g., advertising, PR messaging etc.) as set out in the *UN's Guide for Responsible Corporate Engagement in Climate Policy* but not covered by the register.
- Newly uncovered documents reveal that, in addition to A4E and IATA, airlines including **Air France-KLM** and **Lufthansa** have made use of another group, the **Airline Coordination Platform**, to push for weakening EU climate policies. The Airline Coordination Platform has no dedicated website and appears to be coordinated by an EU-based consultancy firm. In January 2021, **Lufthansa** emailed a policy document written by the Airline Coordination Platform to EU Commission officials. It *advocated against* an EU kerosene tax for reasons including it “would have a negative impact on the profitability of certain routes”, supported reforms to *exclude feeder flights* from the EU ETS for aviation, weakening the scheme, and *appeared unsupportive* of an EU sustainable aviation fuels blending mandate.
- This research also finds the aviation industry has used the COVID-19 crisis to weaken European climate policy. New data from FOI requests reveal that **Airbus** and **Air France** privately lobbied EU policymakers to support subsidizing new aircraft purchases as part of an EU green stimulus scheme. An *Air France-KLM paper* sent to EU Commission officials in March 2021 appeared to support a green stimulus subsidy scheme for new aircraft. Similarly, in a February 2021 meeting with the EU Commission, an *Airbus presentation* advocated for EU policymakers to support an “aircraft fleet renewal” scheme as part of a “green stimulus” to provide “post C19 crisis support to airlines”. The COVID-19 crisis has also been invoked by the industry group **Airlines for Europe** to advocate to *defer or waive new aviation taxes*, by **Air France-KLM's** CEO to *suspend new flight taxes*, and by **Lufthansa** to *oppose reforms* to the EU ETS to include all international aviation emissions in its scope.
- The European aviation industry has also invested in climate-focused PR and ad campaigns like those employed by Big Oil to link their brands to positive climate action, while simultaneously lobbying against climate regulations. These include rebranding carbon-intensive flights as 'green' and promoting lower-cost offsetting measures over absolute GHG emissions reductions. IATA coordinates the Fly Aware campaign, which attempts to shift the cost and responsibility of climate action *from industry to consumers*, and a new FOI reveals is designed to counter the flight shame (flygskam) movement.

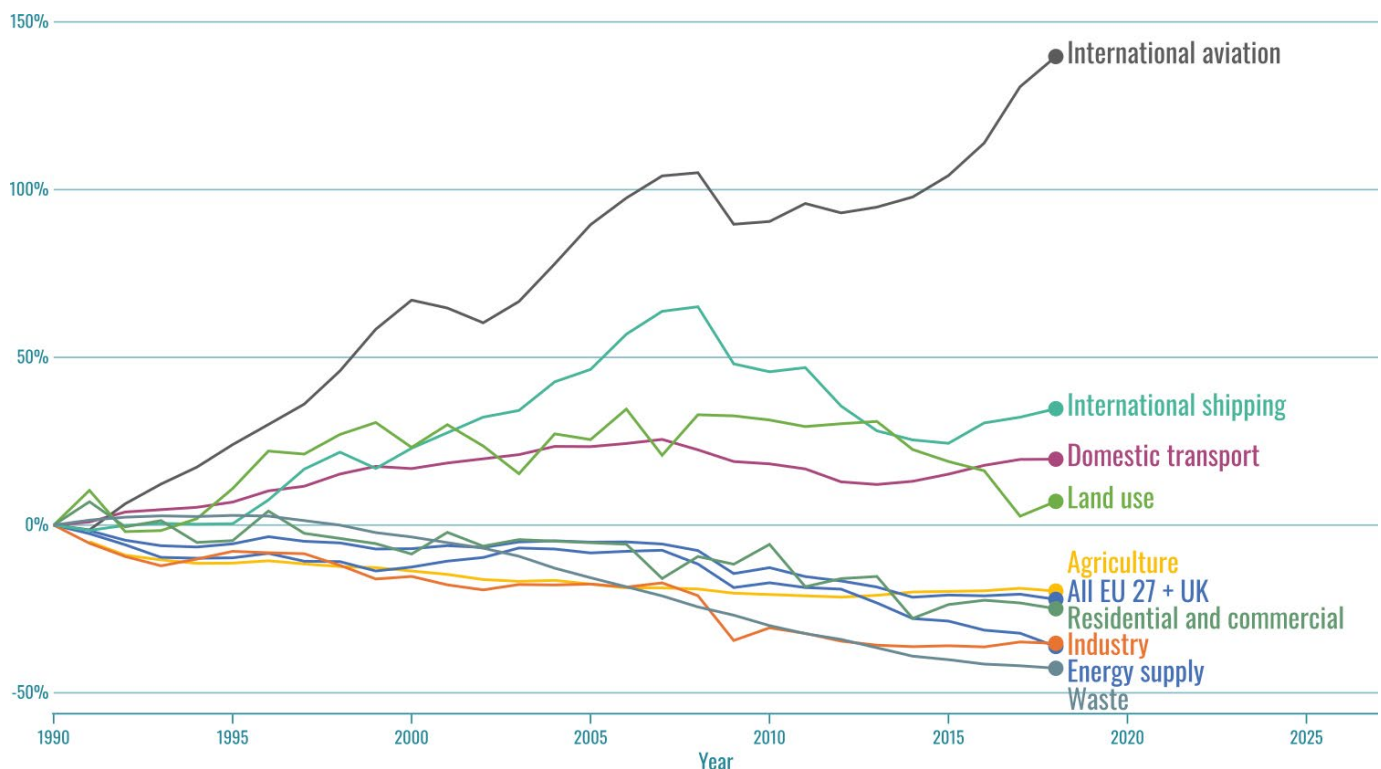
European Aviation and Climate Change

Aviation's Climate Impacts

Aviation is one of the most carbon-intensive forms of transport, and its greenhouse gas (GHG) emissions continued to rapidly grow in Europe until the COVID-19 crisis. The European aviation industry is fossil fuel-dependent, with oil-derived jet fuel directly estimated to account for over **97% of airline GHG emissions**. Air transport on average is the least carbon-efficient form of passenger transport per kilometer in Europe, producing over four times the emissions of an equivalent journey by train, according to a March 2021 **European Environment Agency study**. Yet rapid growth in air travel means flying is now one of Europe's fastest-growing sources of GHG emissions, accounting for **3.9% of all EU GHG emissions** in 2018, the second-largest transport emissions source after road transport.

Since 1990, while overall GHG emissions in the EU have fallen by **more than 25%**, GHG emissions from aviation have more than doubled. Individual airlines have significantly contributed to Europe's climate impacts, with Ryanair in 2019 the **seventh highest individual GHG emitter** in the EU Emissions Trading System, alongside numerous coal plants in the top ten. Sector-wide, while GHG emissions in Europe fell by 3.7% compared to from 2018-19, in the same period European GHG emissions from international aviation **rose by an estimated 3%**, before a sharp COVID-19 driven decline in 2020-21.

Change in European (EU 27 + UK) GHG Emissions by sector 1990-2018 (source: **EEA**)



The COVID-19 crisis has severely affected the European aviation industry, with numerous airlines threatened by collapse after European air traffic *declined by 55%* from 2019 to 2020, with airlines facing *€22.2 billion in net losses* in 2020 alone. Yet even taking into account a temporary post-COVID decline in demand, European air travel is still forecast to return to its 2019 flight peak *as early as 2024*, with post-COVID industry forecasts from the Air Transport Action Group (ATAG) projecting average annual growth of *2.1% from 2018-38* for international European air traffic. In Europe, while efficiency improvements have reduced fuel burned per passenger by *24% between 2005-17*, the rapid growth in flights, partly driven by *the rise of low-cost airlines*, has outpaced such efficiency improvements, with passengers flying on average *60% further from 2005-17*. Consequently, as other European sectors begin to rapidly decarbonize, aviation's growth is projected to take an increasingly large share of Europe's carbon budget, threatening the Paris Agreement's temperature goals.

Furthermore, in November 2020 an *EU Commission study* for the first time comprehensively analyzed the non-GHG impacts of European aviation (including oxidized sulfur, soot particles, and nitrogen oxide). It discovered that aviation's non-CO₂ effects may be *two-thirds* of aviation's total climate impact, with aviation's non-CO₂ effects warming the climate twice as much as CO₂ alone. Yet such climate impacts are currently unaccounted for in European climate legislation, with the EU Commission arguing the report's findings "need to be addressed" in an *accompanying note* to policymakers.

The IPCC and IEA on 1.5°C and Aviation

The 2018 *Report on Global Warming of 1.5°C* from the Intergovernmental Panel on Climate Change (IPCC) stated the urgent need for ambitious policy interventions by governments to dramatically lower global GHG emissions. Regarding transport, it noted that "the 1.5°C pathways require an acceleration of the mitigation solutions already featured in 2°C-consistent pathways (e.g., more efficient vehicle technologies operating on lower-carbon fuels), as well as those having received lesser attention in most global transport decarbonization pathways up to now (e.g., mode-shifting and travel demand management)."

Consequently, significantly more ambitious policy for aviation is required both globally and in Europe to ensure the sector reduces its GHG emissions in line with the temperature goals of the Paris Agreement.

In May 2021, the International Energy Agency (IEA) released its landmark *Net Zero by 2050 report*, detailing the policies required to meet the Paris climate accord goal of limiting global warming to 1.5°C above pre-industrial levels. Regarding aviation, some of the report's key findings to reach net-zero by 2050 include;

- Emissions from heavy trucks, shipping, and aviation fall by an annual average of 6% between 2020 to 2050
- By 2040, 50% of fuels used in aviation are low emissions. Advanced liquid biofuels increase their share of the global aviation fuel market from 15% in 2030 to 45% in 2050.

- Of the emissions reductions in transport in 2050, nearly 80% come from measures to reduce passenger aviation demand, with the remainder from road transport.
- The NZE (Net-Zero Emissions by 2050 Scenario) assumes that air travel, measured in revenue-passenger kilometers, increases by only around 3% per year to 2050 relative to 2020. This compares with about around 6% over the 2010-19 period. The NZE assumes that aviation growth is constrained by comprehensive government policies that promote a shift towards high-speed rail and rein in the expansion of long-haul business travel, e.g. through taxes on commercial passenger flights

European Climate Regulation for the Aviation Sector

The EU and European national governments have recently vowed to take stronger climate action to reduce the climate impacts of aviation. In the EU, the Commission is considering numerous policies to decarbonize aviation as part of the *European Green Deal*, with key proposals now expected in *July 2021*. These regulations include the first EU-wide *sustainable aviation fuels (SAFs) mandate*, a tax on jet fuel, and increasing the ambition of aviation's inclusion in the *EU Emissions Trading System (EU ETS)*.

Such action comes after nine EU countries, including France and Germany, *urged the EU* in 2019 to tax aviation in line with other forms of transport to account for its environmental impacts. Similarly, in April 2021, a cross-party group of 73 MEPs wrote to EU Commission leaders to "*end the tax exemption for aviation fuel*". Frans Timmermans, chief of the European Green Deal, further *stated last year* that "it is high time that the aviation industry would contribute to decarbonization like other industries" and in May 2021 *backed calls* to tax kerosene "like other fuels". Reports from May 2021 further suggest that European finance ministers were considering an *EU-wide tax on kerosene jet fuel*. A *2019 European Commission study* found that European aviation "has a unique fiscal regime" wherein international flights are excluded from fuel taxes, unlike other transport modes like passenger cars. Moreover, unlike many *cross-border European rail services*, some European states exempt air tickets from paying VAT, and only a *minority of EU member states* levy ticket taxes on international aviation.

Simultaneously, many European national governments are actively pursuing increasingly ambitious climate legislation for aviation. For example, in April 2021, France approved measures to *ban short-haul domestic flights* under 2.5 hours where rail alternatives exist, and in 2019-21 numerous states, from *Germany to the Netherlands*, have introduced new climate-related ticket taxes for flights. Additionally, in April 2021, the UK government *announced* that, for the first time, international aviation emissions will be included in its 78% 2030 GHG emissions reduction target, with ambitious accompanying decarbonization measures soon expected. Subsequently, this analysis identifies the four, key European climate regulations for aviation over which industry is likely to be engaged in the following table.

| Regulation | Region | Comments |
|---|-----------------|--|
| EU Emissions Trading System (EU ETS) | EU | The <i>EU Emissions Trading System (EU ETS)</i> includes aviation in the world's largest GHG emissions trading system. While the EU ETS was originally designed to apply to all flights to and from the EU, only <i>intra-EU (EU to/from EU) flights</i> are currently included until 2024, severely reducing the scheme's emissions reduction potential. As part of the European Green Deal, revisions to <i>aviation in the EU ETS</i> are currently being considered. These include proposals to address the EU ETS scope as regards to international (EU to/from non-EU) flights and reduce the significant free emissions allowances currently allocated to aviation. |
| Kerosene-based jet fuel taxation | EU and national | Kerosene jet fuel is currently <i>exempt from tax in Europe</i> , unlike other fossil-based fuels for cars, and some cross-border rail services. Taxing jet fuel is currently being reviewed as part of the EU's <i>Revision of the Energy Taxation Directive</i> . |
| Ticket taxes | National | In the absence of other climate-related regulations or taxes for aviation, many European states have introduced national ticket taxes for flights, <i>citing environmental concerns</i> . A 2019 <i>European Commission study</i> found that only six member states (including the UK) levied ticket taxes on flights, averaging €11 per ticket, with most European states applying no flight ticket taxes at all. |
| Sustainable aviation fuels mandate | EU | Increased use of sustainable aviation fuels (SAFs) is <i>widely recognized</i> to be crucial to the long-term decarbonization of aviation, especially for long-haul flights, yet SAFs currently represents only <i>0.05% of total jet fuel consumption</i> . The EU Commission is reviewing the introduction of an EU-wide SAF mandate to promote their use in the <i>ReFuelEU initiative</i> . |

The Global CORSIA Scheme and Europe

While European governments have sought to introduce more ambitious climate policies, the aviation industry has instead argued that the carbon offset and reduction scheme for international aviation (CORSIA), a globally agreed offsetting scheme, should be Europe's primary climate regulation for flights. CORSIA was *first agreed in 2016* by the International Civil Aviation Organization (ICAO), the UN agency responsible for global climate regulation for aviation. CORSIA, a market-based mechanism, requires airlines to purchase offsets or deploy lower-carbon fuels to compensate for aviation GHG emissions above a 2019 baseline, while aviation's absolute GHG emissions can grow unchecked. The policy remains *voluntary* for all member states until 2027 and *does not account* for aviation's non-GHG climate effects, with a pilot phase operating from 2021-23 that represents around three-quarters of international flights, including *all EU member states and the UK*.

CORSIA has been widely criticized for its reliance on offsetting and failure to reduce aviation's absolute GHG emissions. A previously *unpublished report* for the European Commission released in March 2021 found that CORSIA was "unlikely to materially alter the direct climate impact associated with air travel", and

would achieve little more than a scenario "in which international aviation emissions remain unregulated." *It found* that CORSIA-compliant carbon offset credits available to be purchased by airlines may be low quality, resulting in questions surrounding if such credits could achieve their stated emission reductions. The report concluded that "participating in CORSIA - and leaving all international aviation [...] outside the scope of the EU ETS" would risk undermining the EU's climate objectives, including a 2050 net-zero emissions target, and weakening current EU climate policies. In contrast, it found that expanding the EU ETS to include international (EU to/from EU) flights would lead to the largest GHG emissions reductions.

Similarly, in an independent scientific analysis, *Climate Action Tracker* found that CORSIA and ICAO's aviation climate strategy is "*critically insufficient*" in meeting the temperature goals of the Paris Agreement, with aviation's fair share of GHG emissions leading to a 4°C+ world. It describes CORSIA as having "significant shortcomings, meaning the scheme is highly unlikely to deliver the substantial reductions needed to achieve ICAO's aspiration goal" of post-2020 carbon-neutral growth. It further criticized the quality of the carbon offsetting credits involved in CORSIA, the low decarbonization potential of alternative fuels that airlines can use under CORSIA, and ICAO's lack of Paris-aligned policies to decarbonize aviation. It estimates that under current global aviation climate policies, including CORSIA, and "taking into account the near-term adverse impact of the COVID-19 pandemic on travel", GHG emissions from international aviation are projected to *increase by 220-290% between 2015 and 2050*, putting the Paris Agreements' temperature goals at risk.

Investor Expectations for the Aviation Sector on Climate Change

In January 2021, the Climate Action 100+ (CA100+) initiative released its *aviation sector strategy*, outlining recommended investor expectations on how the sector should manage climate-related risks and opportunities and position itself for the transition to a net-zero emissions economy. Regarding climate policy engagement, some of the report's key recommendations are outlined below.

- Lobby national, regional, and international policymakers in a manner that is transparent and consistent with the goals of the Paris Agreement.
- Support ambitious national and regional climate change policy, and not lobby in a way that undermines Paris Agreement goals or ambitious national or regional climate change policy.
- Establish robust governance procedures on climate lobbying, including conducting regular reviews of whether the lobbying activities of the company's industry associations and industry bodies align with the goals of the Paris Agreement.
- Be transparent about the company's lobbying activities via appropriate disclosures.
- Lobbying the International Air Transport Association (IATA) and the Air Transport Action Group (ATAG) to support a Paris Agreement-aligned decarbonization pathway for the industry.

Assessing Corporate Climate Policy Engagement

Overview

The IPCC's October 2018 *Special Report on Global Warming of 1.5°C* laid out the urgency to act on climate and the key role of government policy in driving this process. However, current Nationally Determined Contributions (NDCs) to the Paris Agreement remain insufficient to meet even the 2°C target and governments worldwide are lagging on introducing meaningful policy designed to drive this transition, according to a *2020 UNEP report*. A key reason for this gap is both the historical and ongoing global opposition by corporate vested interests. Details of this are found within InfluenceMap's *corporate policy engagement* online report.

To understand this picture at a company level, InfluenceMap maintains the world's leading platform tracking and scoring companies and industry associations on their climate policy engagement, a platform that has been operational since 2015. InfluenceMap's analysis and metrics inform the global institutional investor community who wish to have a full understanding of how corporations are impacting climate change. InfluenceMap introduced the concept of a corporation's *Carbon Policy Footprint* (or *Scope 4 Emissions*), a metric to be considered alongside its physical scope 1, 2, and 3 emissions (direct, supply chain, and product emissions, respectively). InfluenceMap's methodology for scoring and ranking companies and industry associations based on their Carbon Policy Footprint is available [here](#).

InfluenceMap's analysis has featured in over *1,500 media articles* and InfluenceMap is part of the Technical Advisory Group of the *Climate Action 100+* (CA100+) investor engagement process with 540 investors with over \$52 trillion in assets collectively under management. The CA100+ initiative works directly with the world's largest corporate greenhouse gas emitters to ensure they take necessary action on climate change, including in their climate policy engagement.

Methodology

InfluenceMap has developed a process for scoring and ranking companies and industry associations on their activities to influence climate change policy. Full details of the methodology are [provided on the page linked here](#). Listed below are some of its key features and resulting outputs.

- InfluenceMap's system adheres to key features of sound corporate assessment metrics: objectivity, transparency, ease of comprehension and use, and includes like-for-like comparisons across and within sectors.
- InfluenceMap's system does not judge climate policy itself but instead measures corporate positions against Paris Agreement-aligned benchmarks of government policy and Science-Based Policy (SBP) benchmarks based on analysis of IPCC statements.

- InfluenceMap defines "policy engagement" based on the UN *Guide for Responsible Corporate Engagement in Climate Policy* (2013), which defines a range of corporate activities as engagement, such as advertising, social media, public relations, sponsoring research, and direct contact with regulators and elected officials.
- InfluenceMap relies on a range of data sources that are publicly accessible and are reliable representations of corporate policy engagement. These include organizational websites, top management statements, regulatory consultation comments, financial disclosures, and reliable media reporting.
- Although the system does not require the cooperation of the organizations being assessed, InfluenceMap has engaged with over 100 large corporations, industry associations, and other stakeholders on our methodology and results.
- InfluenceMap's system is updated continuously as new information becomes available, which is then assessed and added to the InfluenceMap.org online database. These results are freely available and in the public domain. The results are provided in the form of metrics and analysis on individual organizations (see, for example, *Unilever's online InfluenceMap profile*), and *CA100+ company tables*.

To assess which industry associations are the most influential on climate issues, InfluenceMap's method considers the following independent metrics:

- The **Organization Score** (0-100) expresses how supportive or obstructive the organization is towards climate policy aligned with the Paris Agreement, with 100 being fully supportive and 0 being fully opposed.
- The **Engagement Intensity** (0-100) expresses the intensity of this activity, whether positive or negative.
- The **Relationship Score** (0-100) expresses how supportive or obstructive the company's industry associations are towards climate policy aligned with the Paris Agreement, with 0 being fully opposed and 100 being fully supportive (aggregated).
- The **Performance Band** (A+ - F) expresses a measure of a companies' climate policy engagement that accounts for both its and its own industry groups' activity on an A+ through to F scale (A+ = support, F = opposition).

Corporate Lobbying on European Climate Policy for Aviation

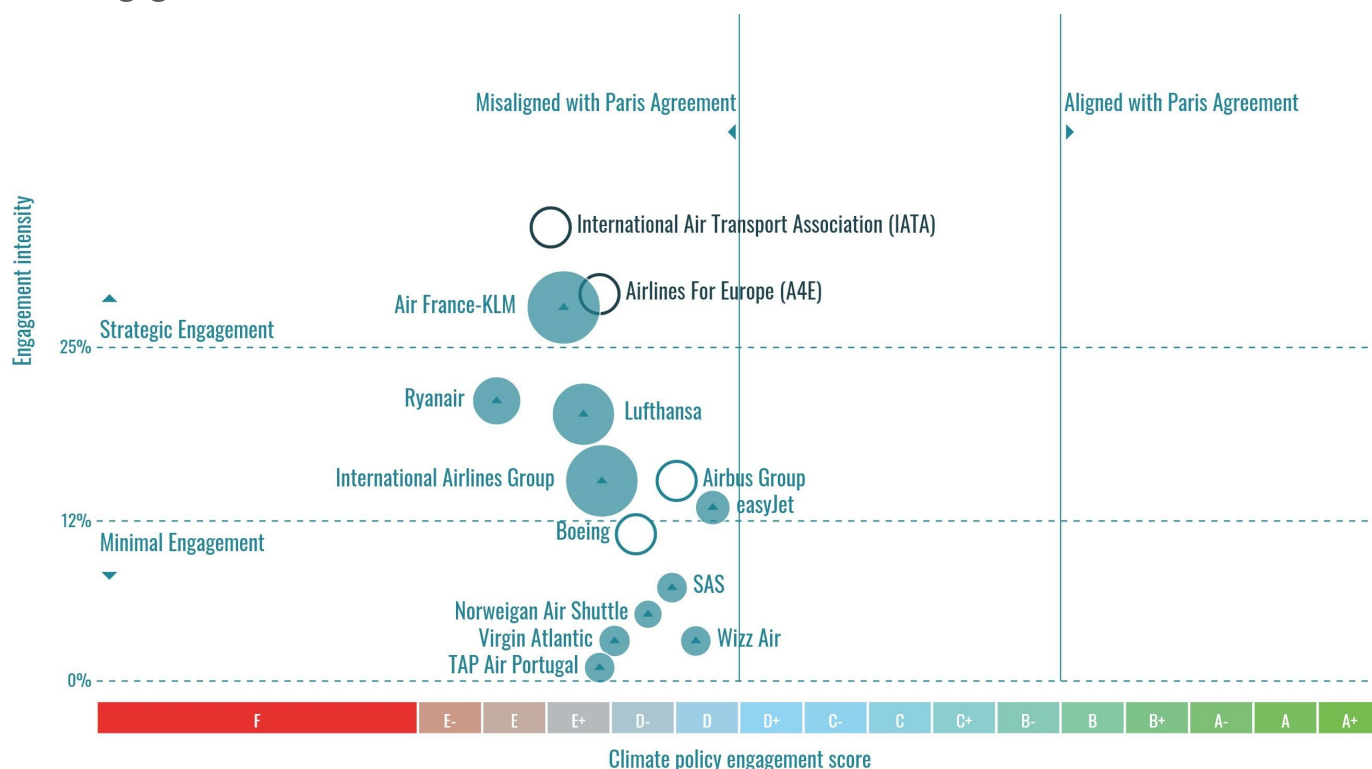
This chapter analyzes recent lobbying from the aviation industry over specific climate regulations in Europe.

Introduction

InfluenceMap has applied its methodology for assessing corporate influence over climate regulation to the European aviation industry. This analysis is based on over 800 independent data points, including data found from over 20 new freedom of information requests. It studies the direct climate policy engagement of the ten European airlines with the *largest available disclosed GHG emissions* in 2019, including both international (EU to/from non-EU) flights, and intra-EU flights¹. This data is combined with analysis of the two largest global aircraft manufacturers, Airbus and Boeing, who collectively represent *around 99% of global large plane orders* and 90% of the worldwide plane market.

The relative positions of the key airlines, manufacturers and airline trade associations in this study are summarized in the quadrant plot below.

Aviation Companies and Industry Associations Compared on Climate Policy Engagement

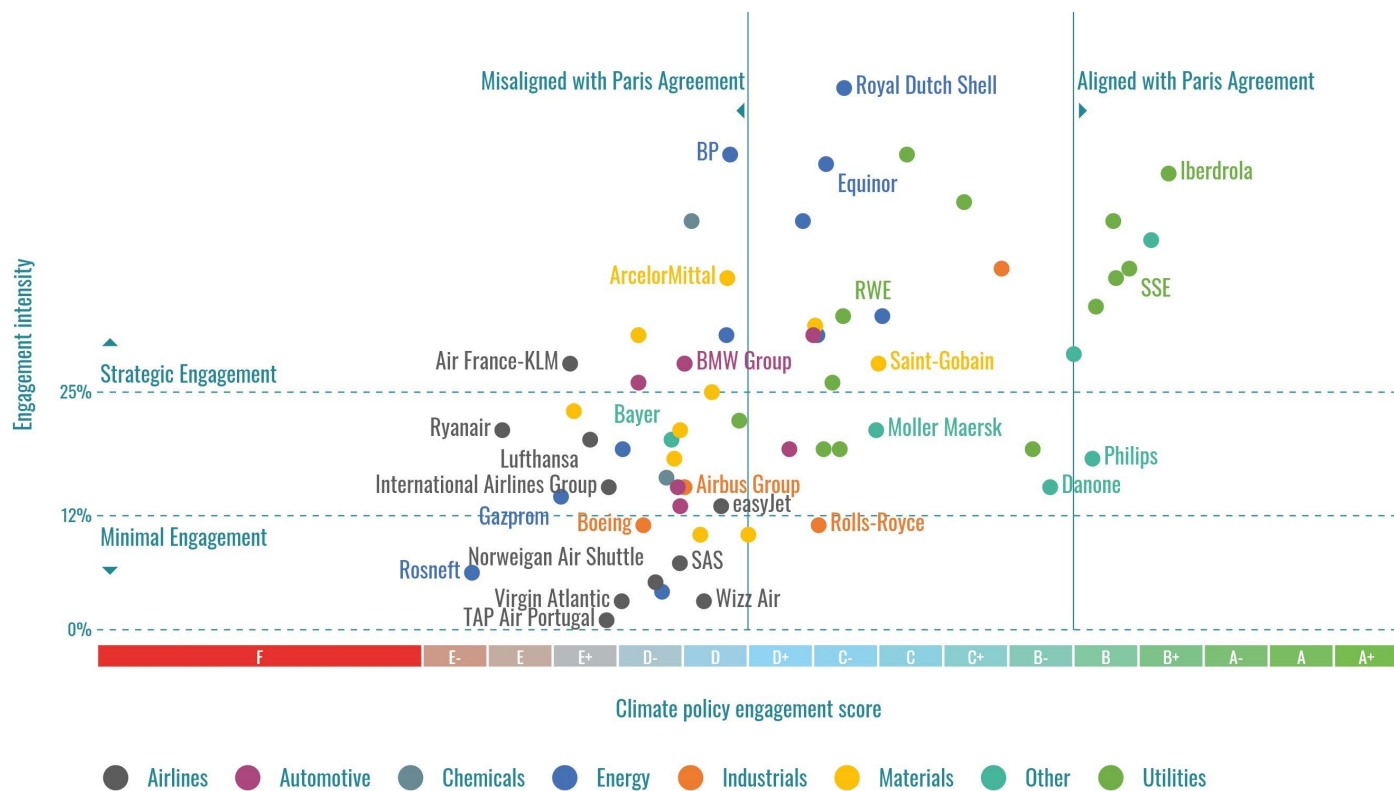


¹ This ranking includes 2019 GHG emissions data from international flights for European airlines (KLM & Air France, and Iberia & British Airways emissions have been combined), apart from Wizz Air and Norwegian, where 2019 EU ETS transaction log data has been used.

The circle size for each airline represents their disclosed GHG emissions, with standardized circle sizes to further represent Boeing, Airbus, IATA, and A4E. Circles closer to the top-left hand corner are actively engaged and opposed to Paris-aligned climate policy, while circles closer to the top-right hand corner are actively engaged in support of Paris-aligned climate policy, with circles closer to the bottom having significantly less direct engagement with climate policy. Notably, every analyzed European airline and industry association has scored D or below, indicating sector-wide misalignment with the Paris Agreement. There is also a clear trend showing airlines with the largest CO2 emissions have the most active and negative climate policy engagement.

This report further studies the indirect climate policy engagement of these companies through the most active aviation-related industry associations at a European (Airlines for Europe (A4E)) and global level (International Air Transport Association (IATA)), whose members collectively represent the wider aviation industry. All analyzed corporations, excluding Wizz Air, are a member of either association, with half of all studied corporations a member of both A4E and IATA. Full scoring profiles of each entity are available on the InfluenceMap website and details of company membership to A4E, and IATA are available in [Appendix 1](#). The following quadrant plot contrasts airlines' climate policy engagement score with every other European CA100+ company in the InfluenceMap system ([InfluenceMap's full CA100+ scoring available here](#)).

The European Corporate Climate Policy Engagement Landscape



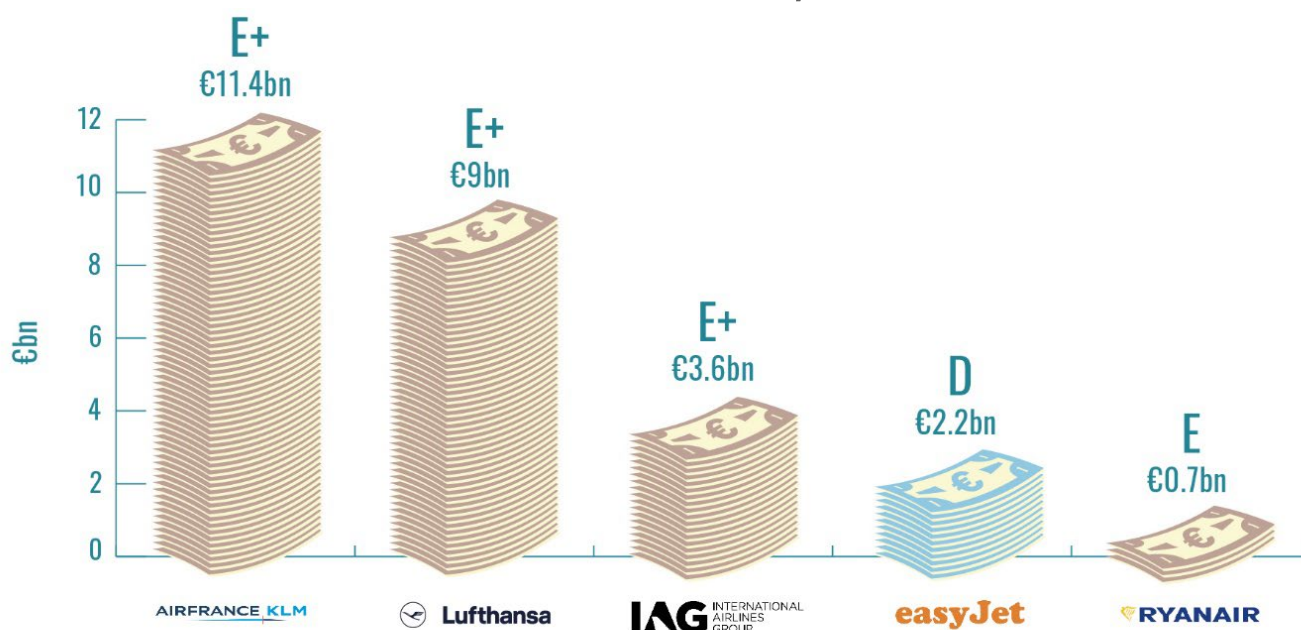
Notably, the airline sector is clustered in the bottom left-hand side of the table, with considerably more collective misalignment than other analyzed sectors. Unlike other sectors, such as utilities (green), the airline sector (gray) is relatively unified in its opposition to Paris-aligned policy, with its scoring range (E to D). This Europe-wide sector comparison shows that the aviation sector is a significant laggard when it comes to Paris-aligned climate policy engagement in Europe.

Detailed Results of InfluenceMap's Analysis

The European aviation industry has actively and collectively opposed key strands of European climate regulation for aviation aligned with the Paris Agreement in 2019-21. The sector has strong alignment in their opposition to key Paris-aligned climate policies in Europe, including taxes on jet fuels and flight tickets and the full inclusion of aviation in the EU ETS, while taking a more mixed position on an EU-wide SAF mandate. A complete table detailing company-level and industry association engagement on European climate policy for aviation is in [Appendix 2](#), with full company lobbying scorecards on specific policies available in [Appendix 3](#).

- The four largest European airlines by GHG emissions (*Air France-KLM*, *International Airlines Group (IAG)*, *Lufthansa*, and *Ryanair*), representing over 50% of EU flight passengers in 2019, have the most active and negative climate policy engagement. They therefore likely have the largest carbon policy footprints (scope 4 emissions) in Europe, with all four airlines disclosing the largest EU lobbying spend of all airlines covered in this report (see [Aviation spending on climate lobbying](#)). Three of these airlines further have historically close ties to key European governments (Air-France KLM, Lufthansa, and International Airlines Group – whose airlines include British Airways, Iberia, and Vueling) and have collectively received the three largest COVID-19 government bailouts in Europe (see image below).

COVID-Related Bailouts to Airlines and Climate Policy Scores



Climate policy organization score on A - F scale, with A being fully supportive and F being fully opposed

- The aviation sector is supported in their negative lobbying by key two industry associations of which many airlines and aircraft manufacturers are members (*see Appendix 1*), *Airlines for Europe (A4E)* and the *International Air Transport Association (IATA)*. Through these associations, aviation companies have indirectly engaged to oppose Paris-aligned climate policy for aviation. This is led by Airlines for Europe at a European level and IATA at a global level.
- The aviation industry has actively opposed measures to increase the ambition of the **EU Emissions Trading System (EU ETS)** for aviation. In multiple 2020-21 EU consultation responses, A4E appears to have *advocated* replacing the direct regulation of intra-EU aviation emissions under the EU ETS, with a hybrid system including both the EU ETS and CORSIA. At the same time, A4E has *questioned* the legality of the proposal to extend the EU ETS to international (EU to/from non-EU) flights and *opposed* a reduction in free EU ETS emissions allowances.
- Furthermore, extensive new evidence **accessed by InfluenceMap via FOI requests²** reveals multiple instances of industry privately lobbying EU officials to weaken or replace the EU ETS as a measure to address aviation emissions in 2020-21 by playing it off against the UN's CORSIA offsetting scheme (*a strategy explained in detail the following chapter*). Notes from a *private February 2020 meeting* between IATA and EU Commission staff disclose IATA viewed the EU ETS as "endangering CORSIA", with IATA calling on the "EU to show full support to CORSIA" as "the only global market based measure to apply". In a January 2021 email to EU Vice-President of the European Green Deal, Frans Timmermans, Lufthansa advocated for policies including the potential *exemption of intra-EU feeder flights* from the EU ETS, and in a March 2021 *policy paper* emailed to EU Commission officials, Air France-KLM advocated that "changes to the EU ETS must allow for a full and proper implementation of CORSIA". Similarly, IAG's *2020 CDP disclosure states* they are "actively lobbying UK and EU Governments on the issue that CORSIA should replace aviation's inclusion in the EU ETS"
- The sector has also opposed an **EU-wide kerosene tax on jet fuel** in 2019-21. In 2020 EU consultation responses to the Energy Taxation Directive, *Airlines for Europe*, *Air France-KLM*, *Ryanair*, and *IATA* directly advocated to EU policymakers to oppose an EU kerosene tax on jet fuel. Furthermore, in a 2019 press conference, Ryanair's CEO, Michael O'Leary, appeared to *oppose* a jet fuel tax, asserting that "fuel taxes damage EU competitiveness and distort traffic flows".
- The aviation industry has actively opposed national **ticket taxes** for flights in 2019-21. In April 2020 KLM appeared to *oppose* a Netherlands ticket tax, communicating that taxes "do not help the environment", with Air France-KLM's CEO, Ben Smith, later similarly stressing new taxes "do not

² All 20+ FOI requests originally from InfluenceMap, excluding a single FOI regarding Air France sent by Lora Verheecke.

support emissions reductions" to *oppose* increasing French ticket taxes in September 2020. Furthermore, IATA messaging in 2019-20 stated opposition to ticket taxes in *Switzerland, France*, and *Germany*. and a Lufthansa spokesperson *advocated against* increasing the German ticket tax for flights in 2020.

- In contrast, the aviation industry has mixed to negative engagement with an **EU sustainable aviation fuels (SAFs) mandate**. In an April 2020 EU consultation response, Airlines for Europe *argued* a SAF mandate should only be considered "under mature market conditions". Similarly, **new FOI requests accessed by InfluenceMap reveal** that Air France *advocated* that an EU SAF mandate should only be introduced on a "mature" market in a March 2021 paper emailed to EU Commission officials, with Lufthansa further emphasized "competitiveness issues" around a SAF mandate in private emails to EU Commission officials in *January* and *February 2021*. In an April 2020 EU consultation response, IAG *urged policymakers* to only include intra-EU flights in a SAF mandate, while asserting they are lobbying to "prevent mandates that create competitive distortion [...] at EU and UK levels" in their *2019 Annual Report*. Additionally, *Ryanair* and *easyJet* appear to support including international (EU to/from non-EU) flights alongside intra-EU flights in a SAF mandate.
- In contrast to *Air France-KLM, International Airlines Group, Lufthansa*, and *Ryanair*, *easyJet* appears to have a more progressive, mixed stance on numerous EU climate policies. easyJet has stated support for the inclusion of intra-EU flights, but not international (non-EU to/from EU) flights, in the EU ETS in its *2020 Annual Report*. **FOI requests from InfluenceMap** also uncover that in private 2019 emails to the EU Commission easyJet *stated* that "if a tax is needed, it must be directly linked to GHG – i.e. a fuel tax" regarding climate taxes for aviation. Furthermore, while easyJet publicly urged the UK government to suspend the Air Passenger Duty (APD) tax for twelve months due to the Covid-19 crisis in September 2020 *testimony* to the UK government, it advocated for APD reforms to ensure flights are taxed based on their carbon emissions per journey.
- The next five largest airlines by GHG emissions in this analysis (*Virgin Atlantic, Scandinavian Airlines (SAS), TAP Air Portugal, Norwegian Air Shuttle ASA*, and *Wizz Air*) have limited disclosure and low direct engagement with European climate-related regulations, although all but Wizz Air retain memberships to either IATA or A4E. Evidence collected by InfluenceMap does suggest some engagement with regional policies in Europe, for example *SAS* and *Norwegian Air Shuttle ASA* have communicated opposition to national ticket taxes in Sweden and Norway,
- There is likewise limited transparency regarding the EU policy engagement activities of *Boeing* and *Airbus*, despite the significance of the companies to delivering a low-carbon transition for aviation. Both Boeing and Airbus have communicated high-level support for climate action on aviation emissions, particularly emphasizing the importance of global policy actions via ICAO. However, both companies also appear to have shared European airlines' positions on regional and national regulations.

For example, Airbus appears to have joined Air-France KLM in using the COVID-19 crisis to lobby EU officials in private meetings and emails in 2021 to *subsidize new aircraft purchases* through a "green stimulus" scheme (*explained in the following chapter*) while Boeing *expressed similar concerns* to Lufthansa and other airlines regarding a stringent EU SAF mandate in a 2020 consultation response.

- Furthermore, both Airbus and Boeing are members of IATA and A4E. The companies also retain memberships to other powerful cross-sector industry associations InfluenceMap has found to be highly oppositional to ambitious climate policy in the US and Europe including *the National Association of Manufacturers* (Boeing) and the *US Chamber of Commerce* (Boeing) and the *Federation of German Industries* (Airbus) and *Mouvement des Entreprises de France* (Airbus).

Airline Coordination Platform

Alongside major industry associations, companies also often strategically employ professional, external public affairs agencies to privately influence climate regulations. The Airline Coordination Platform is a Brussels-focused lobbying organization, which appears to be run through *a consultancy firm*, with national, "legacy" airline members including *Air France, KLM, Lufthansa, Scandinavian Airlines, and TAP Air Portugal*. While the Airline Coordination Platform appears to have previously focused competition law issues for airlines, during the COVID-19 crisis, it appears to have focused on lobbying EU climate policy.

New documents, uncovered by InfluenceMap freedom of information requests, reveal that the Airline Coordination Platform has written climate policy papers directly emailed to EU Commission officials by Lufthansa. These documents include a December 2020 position paper on the 'Greening of European Aviation' which states *top-line support* for the EU's climate neutrality 2050 objective and specifies that policies measures to enforce the Green Deal should apply to all airlines serving the European Market and compensated by third country airlines via a Carbon Border Adjustment Mechanism.

However, the group appears unsupportive of stringent near-term action to reduce GHG emissions. It argues that distortions like carbon leakage will continue "as long as regional instruments, such as the EU Emissions Trading System (EU ETS), remain in place". This position paper *advocates* for policies including an increased free allocation of EU ETS allowances for airlines operating feeder flights (flights to hub airports from destinations not served by larger airlines). This would likely weaken the scheme's emissions reduction potential. Moreover, the position paper appears *unsupportive* of a sustainable aviation fuels (SAFs) mandate, arguing that "given that the high price of SAFs remain, the blending mandates as currently being discussed would adversely impact the competitiveness of EU airlines.". It also urges the Commission to use EU ETS auction revenues to subsidize SAFs and/or exempt feeder flights from an EU-wide SAF mandate, and for SAF mandates to be dealt with only at a global level.

The December 2020 paper further *argues* "an EU kerosene tax will not reduce emissions – the opposite effect may occur", opposing both EU-level and national jet fuel taxes and later stressing that a jet fuel tax "would have a negative impact on the profitability of certain routes, leading to a reduction of connectivity if such routes could no longer be served profitably". Lastly, while the *paper* argues to promote rail as an alternative to short-haul flights, it suggests banning short-haul flights is "counterproductive", and advocates to "stop levying airlines and using the revenues to subsidize domestic state-operated rail transport", suggesting opposition to aviation ticket taxes.

In an October 2020 EU consultation response, the Airline Coordination Platform similarly emphasized concerns around costs, and the risks of *"tankering"* regarding an EU SAF mandate, suggesting an unsupportive position, and advocated for an *exemption for intra-EU feeder flights* from the EU ETS.

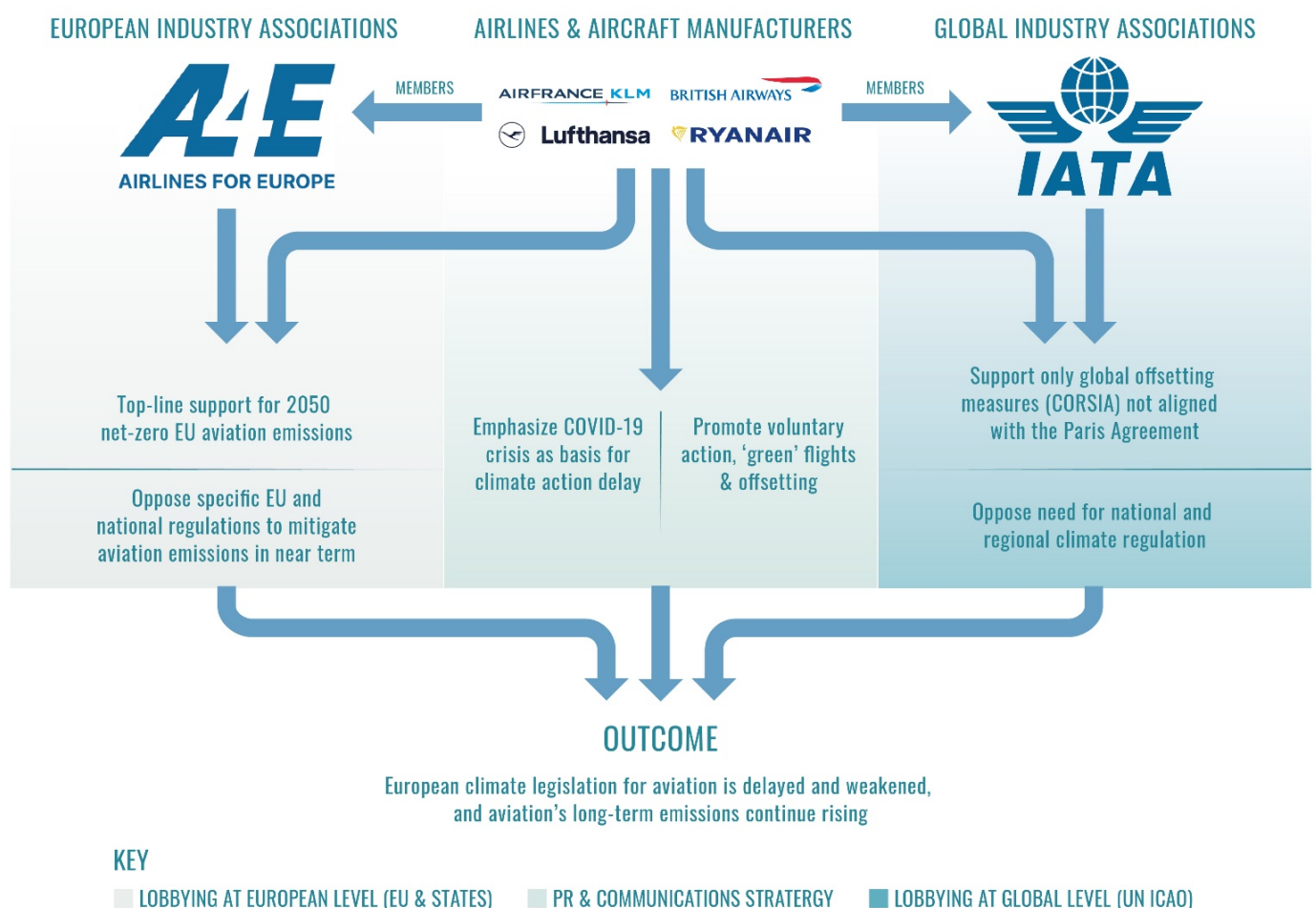
The Lobbying Strategy of Europe's Aviation Sector

This chapter outlines the key lobbying and influencing strategies employed by the European aviation sector on climate change, including their lobbying strategies, disclosed EU lobbying spend and public relations narratives.

Aviation Industry Lobbying Strategy

The European aviation industry has employed three key strategic narratives to collectively delay, weaken and block ambitious climate legislation for aviation at national, EU, and global levels, in addition to lobbying directly against specific climate regulations.

The Aviation Sector's Climate Policy Strategy Explained



The Aviation Sector Supports Net-Zero EU Emissions by 2050 - While Opposing Specific Near-Term EU and National Regulations to Reduce Emissions

InfluenceMap's analysis on climate-related lobbying has identified an increasingly common industry strategy to support long-term net-zero targets while opposing specific Paris-aligned near-term policy measures to achieve them. The European aviation industry has fully embraced this tactic, strategically delaying ambitious climate regulation for aviation while hiding near-term inaction on decarbonization.

- In February 2021, the European aviation industry (including Airlines for Europe) announced sector-wide support, as part of the *Destination 2050 Initiative*, for net-zero aviation emissions from all flights within, and departing the EU, UK, and EFTA by 2050. The report was released during key EU deliberations on climate regulation for aviation, and was emailed to EU Commission officials pre-release in February 2021 by Airlines for Europe, who *stated* that "in the current crisis the industry is finding itself, the strategic significance of such commitments cannot be underestimated". However, the report's *key commitments* do not appear to outline support for any specific, ambitious near-term climate policies to decarbonize the sector.
- Simultaneously, the European aviation industry has actively and collectively lobbied against nearly all strands of specific European climate regulation for aviation, including all climate-related taxation for aviation. For example, Airlines for Europe, Europe's leading aviation industry association, in an April 2020 EU consultation response *argued* that "climate policy regulation in the form of sector-specific taxes, levies or bans are ecologically and economically counterproductive". Similarly, statements from airline CEOs in 2019-20 including *International Airlines Group*, *Ryanair*, and *Air France-KLM* appear to oppose climate-related aviation taxes, disputing their environmental benefits, with an Air France paper emailed to EU Commission officials in March 2021 arguing "new taxation must be avoided".

Support Weak, Global Climate Regulations only - the CORSIA Offsetting Scheme

Alongside strategically lobbying against all Paris-aligned EU-level and national-level climate regulations, the aviation industry has urged the EU to prioritize global-only aviation climate policy that relies on offsetting over reducing the sector's absolute GHG emissions. This includes supporting the replacement of the EU ETS with CORSIA, while also lobbying to weaken the CORSIA offsetting scheme at a global level. This is despite *EU Commission* analysis that European participation in CORSIA over the EU ETS would achieve little more than a scenario "in which international aviation emissions remain unregulated". This two-point strategy to disable climate policy for aviation in Europe is outlined below.

- **European-level:** At a European level, Airlines for Europe have advocated that CORSIA replaces more ambitious EU and national-level climate regulations in EU consultation responses. In EU consultations, A4E *argued* in October 2020 that "regional climate solutions risk shifting GHG at the expense of airlines based in the region", further *stating* in an August 2020 consultation response that "all national and regional policy on aviation emissions must now be done with the utmost care to align with and support

CORSIA". Companies have also directly lobbied aviation climate policy in Europe. In March 2021 emails to EU Commission officials, *Air France advocated* for a "full and proper implementation of CORSIA", and in a 2020 EU consultation response Lufthansa urged the EU *to apply CORSIA* "in its full scope". Similarly, International Airlines Group's 2020 CDP response *discloses* that "we are also actively lobbying UK and EU Governments on the issue that CORSIA should replace aviation's inclusion in the EU ETS". Regarding CORSIA they *further disclose* that "IAG has actively supported negotiations to secure 'CORSIA' at ICAO, and have "sent delegations to participate in the negotiations in ICAO as part of our industry trade association IATA's delegation".

- **Global-level:** At a global level, IATA, of which eight of the twelve aviation companies analyzed in this report remain a member (see *Appendix 1*) has *lobbied* for the CORSIA offsetting strategy to be "the only market-based measure applied to international flights", opposing all other *regional and national climate regulations* for aviation. In Europe during the COVID-19 crisis, IATA urged the EU in an August 2020 consultation response to *support CORSIA* over more ambitious regional climate measures, and in September 2020 argued that national and regional climate regulations for aviation, such as a *French ticket tax* on flights, "*could jeopardize CORSIA*". In 2020 IATA also led lobbying efforts to weaken the CORSIA offsetting scheme (see box below).

IATA and the CORSIA Offsetting Scheme

At a global level, during the COVID-19 crisis, the International Air Transport Association (IATA) *led efforts* at the International Civil Aviation Organization (ICAO) to change CORSIA's baseline year from the average emissions of 2019-20, to solely 2019. The change was first proposed in a *March 2020 IATA position paper*, after a pandemic-driven dramatic decline in air travel. Alongside *lobbying a senior ICAO official* in April 2020 to support the baseline change, **new evidence uncovered in an FOI request by InfluenceMap** reveals IATA *lobbied* EU officials in a private April 2020 meeting for their support. Following intensive lobbying, in June 2020 *ICAO agreed to change* the baseline date for CORSIA to 2019, in line with IATA's demands.

The baseline change date significantly reduced the emissions reduction potential of CORSIA. Under the new baseline, offsetting is not required until aviation's emissions increase above previous 2019 records, which IATA forecasts will not be *until 2024*, due to a worldwide air traffic decline during the COVID-19 crisis. IATA estimated that weakening the baseline date would save airlines *\$15 billion in offsetting costs*, with ICCT research finding the change would *leave around 81 million tons of emissions* no longer required to be offset.

Use the COVID-19 Crisis to Delay and Weaken Climate Regulation for Aviation

While the ten airlines covered by this study have received **€30bn in government bailouts** since the beginning of the Covid-19 crisis without binding environmental conditions, the airline industry has used the Covid-19 crisis to lobby to weaken and delay climate regulation for aviation in Europe in the following ways.

- **COVID-19 and European lobbying:** Airlines for Europe in March 2020 used COVID-19 to advocate for a **defer or waiver new aviation taxes** in a March 2020 press release, and referenced COVID-19 to justify **not reducing** free EU ETS allowances for aviation in a February 2021 EU consultation submission. Similarly, in March 2020, Air France-KLM CEO, Benjamin Smith, **argued** that “in view of the coronavirus outbreak, we are asking governments to suspend the introduction of new flight taxes” and in May 2020 the **Ryanair CEO, Michael O’Leary stated** that “I suspect an awful lot of the environmental agenda and targets will be put on the back burner for a number of years” during the COVID-19 crisis. IATA also **lobbied policymakers** to provide flexibility with EU ETS compliance for the aviation industry due to COVID-19 in a private April 2020 meeting, and **Lufthansa argued** that reductions for free emissions allowances in the EU ETS “should only start after the COVID-19 crisis” in a November 2020 EU consultation response. Lastly, both IATA and A4E opposed climate conditionality attachments to COVID-19 related airline bailouts during the COVID-19 crisis. In April 2020, IATA’s former Alexandre de Juniac **stated**, “it’s no time for requirements”, while an A4E spokesperson similarly **argued** that “this is not the time to be discussing green conditions for government support to airlines”.
- **UK Air Passenger Duty:** In the UK, Ryanair, easyJet, and British Airways (an IAG subsidiary) used the COVID-19 crisis to advocate directly to the UK government to suspend the UK air passenger duty (APD), a ticket tax on flights, for twelve months or more. Ryanair’s CEO, Michael O’Leary provided oral evidence to the UK Government in March 2021, using the Covid-19 crisis to **advocate** for the APD to be repealed “for a one or two-year period”. Similarly, easyJet **supported** the repeal of the Air Passenger Duty for twelve months in September 2020 in a UK parliamentary committee meeting. In September 2020, the CEO of British Airways, an IAG subsidiary, **urged** the government to suspend the APD for “a minimum of a 12-month period” for domestic travel in a parliamentary committee meeting. Following such advocacy, the UK government announced plans to **cut the UK air passenger duty on domestic flights** in March 2021.
- **EU subsidies for new aircraft:** Airbus and Air-France KLM also appear to have directly used the COVID-19 crisis to lobby EU Commission officials in private meetings and emails in 2021 to subsidize new aircraft purchases for airlines through a “green stimulus” scheme. **In documents accessed by InfluenceMap from FOI requests** **Air France argued** for a green stimulus subsidy scheme for new aircraft that “should at least be allowed in the context of the EU Taxonomy and the EIB lending policy”. Similarly, in a February 2021 meeting with the EU Commission, an **Airbus presentation advocated** for EU policymakers to support an “aircraft fleet renewable” scheme as part of a “green stimulus”, including through the EU’s taxonomy, that would provide “post C19 crisis support to airlines”.

Aviation Spending on Climate Lobbying

Comprehensive spending disclosures from companies on climate lobbying and PR activities from the aviation sector across Europe are limited. However, companies and industry associations lobbying EU regulations are legally required to disclose their estimated annual lobbying costs related to the [EU Transparency Register](#). However, such data has numerous limitations. It does not disclose the proportion of overall lobbying costs spent on climate-related regulations and excludes lobbying costs in national states or at a global level. Moreover, it does not include spending on public relations, advertising, and other influencing activities defined as policy engagement according to the [UN Guide for Responsible Corporate Engagement in Climate Policy](#).

However, EU Transparency registry data does provide a limited indication of the scale at which the aviation industry is actively lobbying EU regulations, including on climate change. In its 2020 Annual Report, Air-France KLM disclosed a €2.75 million global "[expenditure for policy influence](#)" in 2019, with "the majority of these costs relate to memberships of national and international trade associations". However, Air France-KLM only disclosed a [2019 lobbying spend](#) in the EU Transparency Register of between €400,000 - €499,999 relating to EU activities, with this figure doubling to €900,000 - €999,999 from [2019 to 2020](#), suggesting a significant increase in lobbying activities during the COVID-19 crisis.

In total, the annual EU lobbying spend for the five largest European airlines, the two primary aircraft manufacturers (Boeing and Airbus), and two key industry associations (A4E and IATA) is around **€6.75 million** per year (see [Appendix 4](#) for a full breakdown). Notably, only the five largest airlines disclosed a lobbying spend of over €9,999 per annum, indicating that climate-related lobbying spending for aviation is dominated by these five companies (Air France-KLM, easyJet, International Airlines Group, Lufthansa, and Ryanair).

Public Relations, Branding, and Climate Change

InfluenceMap research (see [Big Oil's Real Agenda on Climate Change](#), March 2019) has previously identified corporations have increasingly invested in PR and ad campaigns designed to link their brands to positive action on climate. However, simultaneously many of the industry associations they fund engage in lobbying largely misaligned with the Paris Agreement. Similarly, recent academic research by Robert Brulle, Director of Research at the Climate Social Science Network ([2019](#)) found that advertising by fossil fuel companies has become a dominant strategy to influence climate policy through manipulating the public narrative on climate.

The European aviation industry appears to have employed similar advertising and PR strategies and narratives to Big Oil to suggest the sector has been contributing to climate action, while simultaneously lobbying against Paris-aligned regulation for aviation. Three key public relations strategies found by this study employed for the aviation industry to link their brands to positive action include.

- **'Green' flights:** Although aviation in Europe is the *most carbon-intensive* form of transport, with EU GHG emissions from international aviation *more than doubling since 1990*, many airline companies are attempting to rebrand flights as 'green' or low-carbon. Notably, two major European airline advertising campaigns were stopped by regulators for misleading consumers over their "green" credentials in 2020. In the UK, an *ad campaign* that claimed Ryanair was Europe's "lowest emissions airline" was banned for being misleading, and *Ryanair's website* in 2021 still claims to be "Europe's greenest" airline. In June 2020, KLM was also *ordered by the Dutch advertising regulator* to change its advertising campaign for misleading consumers on the scale of its biofuel use.
- **Prioritizing offsets over real-world GHG emissions reductions.** The European aviation industry has consistently promoted the importance of offsetting schemes like CORSIA in their messaging, rather than reducing their absolute GHG emissions reductions at source, while other sectors such as electricity have seen *rapid decarbonization* since 1990. European airlines appear to be strategically embracing offsets to green their public image at low cost while simultaneously increasing the number of European flights they operate each year, and therefore their direct GHG emissions. In Europe, while some airlines like *Lufthansa* encourage passengers to offset their flights, others like *easyJet* or *British Airways*, purchase offset credits to cover many or all of their flights.
- However, a major investigation in *May 2021* found that offset credits used by European airlines including British Airways and easyJet were sometimes "not fit for purpose", overstated emissions reductions, and resulted in "phantom carbon credits" that did little for climate action. Similarly, in 2020 Ryanair *dropped two carbon offset schemes* funded by passengers after criticisms they failed to reduce real-world GHG emissions. Such offsetting schemes have been further criticized by major airlines, with the *CEO of United Airlines arguing* in March 2021 that "the truth is that most carbon offsets aren't even real".

IATA and the FlyAware Campaign

At a global level, IATA coordinates the Fly Aware campaign, *first announced in 2019* to counter the 'flight shaming' movement weakening demand for air travel in Europe. An InfluenceMap FOI request from a 2020 International Airlines Group meeting with the EU Commission revealed that the *FlyAware* website was being developed by IATA to "inform the public on the environmental impact of aviation in a nuanced way, as they see the flygskam movement as potentially damaging and unfair to the sector". FlyAware promotes the role of *flyers* in reducing aviation emissions – "From offsetting your flights emissions to packing lighter, you can already make some simple changes to reduce your own carbon footprint when you fly", attempting to strategically shift the cost and responsibility of GHG emissions reductions to consumers.

- **Flying as a social good:** Low-cost European carriers like Ryanair and easyJet, are increasingly employing arguments around inequality to push back against climate regulation and secure the aviation industry a social license for unconditional growth. For example, Ryanair's CEO, Michael O'Leary in March 2021 stated that the *UK Air Departure Tax* for flights "is regressive, and it hits the poorest people hardest". Similarly, easyJet's CEO, Johan Lundgren, *argued in 2020* "if people connect less, if there's less mobility in the world, the higher the inequality" in response to proposals to reduce flying in Europe.
- Research however indicates that growing European aviation emissions are strongly linked to wealthy, frequent fliers. A *2020 academic study* found that only 2-4 % of the global population flew internationally in 2018, with wealthy frequent flyers that represented 1% of the world population emitting 50% of GHG from commercial aviation in 2018. Similarly, a *2021 Possible study* found such trends mirrored within European states, like in France, where 2% of the population take 50% of all flights, and that frequent fliers tend to have higher incomes. Similarly, *in the UK*, 70% of all flights are made by a wealthy 15% of the population, with 57% not flying at all. Consequently, climate-related regulations for aviation are likely to *impose greater costs on globally wealthy households*.

Appendices

Appendix 1: Corporate Membership of Aviation Industry Associations

| Table Key | |
|--------------------------------|--------------------------------------|
| Member of industry association | Not a member of industry association |
| | |

| Corporation | <i>Airlines for Europe (A4E)</i> | <i>International Air Transport Association (IATA)</i> |
|---|----------------------------------|---|
| Airline | | |
| <i>Air France-KLM</i> | | |
| <i>International Airlines Group (IAG)</i> | | |
| <i>Lufthansa</i> | | |
| <i>Ryanair</i> | | |
| <i>easyJet</i> | | |
| <i>Virgin Atlantic</i> | | |
| <i>Scandinavian Airlines (SAS)</i> | | |
| <i>TAP Air Portugal</i> | | |
| <i>Norwegian Air Shuttle ASA</i> | | |
| <i>Wizz Air</i> | | |
| Aircraft Manufacturer | | |
| <i>Airbus</i> | | |
| <i>Boeing</i> | | |

Appendix 2: Engagement on EU and National-Level Aviation Climate Policy

| Table Key | | | |
|-------------------------------------|----------------------------------|-------------------------------------|--|
| Negative positioning and engagement | Mixed positioning and engagement | Positive positioning and engagement | Has not disclosed positioning and engagement |
| | | | |

| Industry Association | | Engagement intensity | | Organization score | Performance Band | EU emissions trading system | Kerosene jet fuel taxation | National ticket taxes | Sustainable aviation fuels mandates |
|---|-------------------------------------|----------------------|--------------------|--------------------|------------------|-----------------------------|----------------------------|-----------------------|-------------------------------------|
| <i>Airlines for Europe (A4E)</i> | | 28% | | 39% | E+ | | | | |
| <i>International Air Transport Association (IATA)</i> | | 34% | | 35% | E+ | | | | |
| Airline | COVID-19 bailout money ³ | Engagement intensity | Relationship score | Organization score | Performance Band | EU emissions trading system | Kerosene jet fuel taxation | National ticket taxes | Sustainable aviation fuels mandates |
| <i>Air France-KLM</i> | €11.4bn | 28% | 38% | 35% | E+ | | | | |
| <i>International Airlines Group (IAG)</i> | €3.6bn | 14% | 47% | 37% | E+ | | | | |
| <i>Lufthansa</i> | €9.0bn | 20% | 37% | 38% | E+ | | | | |
| <i>Ryanair</i> | €0.7bn | 21% | 39% | 30% | E | | | | |
| <i>easyJet</i> | €2.2bn | 12% | 39% | 49% | D | | | | |
| <i>Virgin Atlantic</i> | N/A | 3% | 35% | 41% | E+ | | | | |

³ European Airline Bailout Tracker, April 2021. Data includes bailouts for International Airline Group and Lufthansa subsidiaries.

| Scandinavian Airlines (SAS) | €1.13bn | 6% | 35% | 46% | D- | | | | |
|-----------------------------|---------|----------------------|--------------------|--------------------|------------------|-----------------------------|----------------------------|-----------------------|-------------------------------------|
| TAP Air Portugal | €1.2bn | 0% | 37% | 39% | E+ | | | | |
| Norwegian Air Shuttle ASA | €0.3bn | 4% | 39% | 43% | D- | | | | |
| Wizz Air | €0.3bn | 2% | N/A | 47% | D | | | | |
| Aircraft Manufacturer | | Engagement intensity | Relationship score | Organization score | Performance band | EU emissions trading system | Kerosene jet fuel taxation | National ticket taxes | Sustainable aviation fuels mandates |
| Airbus | | 14% | 48% | 44% | D | | | | |
| Boeing | | 11% | 36% | 46% | D- | | | | |

Appendix 3: Corporate Climate Policy Engagement on Specific European Regulations

| Table Key | | | |
|-------------------------------------|----------------------------------|-------------------------------------|--|
| Negative positioning and engagement | Mixed positioning and engagement | Positive positioning and engagement | Has not disclosed positioning and engagement |
| | | | |

| EU Emissions Trading System (EU ETS) | | |
|---|----------|---|
| Industry Association | Position | Evidence |
| <i>Airlines for Europe (A4E)</i> | Negative | In 2020-21, Airlines for Europe (A4E) stated <i>opposition</i> to including international (EEA to/from non-EEA) flights in the EU ETS and <i>questioned</i> the legality of extending the EU ETS to international non-EEA flights in multiple EU consultation responses. Furthermore, evidence suggests A4E <i>supports</i> replacing the current inclusion of intra-EEA flights (EEA to/from EEA) in the EU ETS with a hybrid system that includes both <i>the EU ETS and CORSIA offsetting</i> scheme. In a January 2021 consultation, A4E has also appeared to <i>oppose</i> other measures to strengthen the EU ETS. In a February 2021 consultation response, A4E further <i>supported</i> the continued free emissions allocation of permits for aviation in the EU ETS, stating that "free allocation and a possible Carbon Border Adjustment Mechanism (CBAM) must be complementary". |
| <i>International Air Transport Association (IATA)</i> | Negative | In a private meeting with EU DG Transport staff in February 2020, IATA <i>asserted</i> that it viewed the EU ETS "as endangering CORSIA", called on the "EU to show full support to CORSIA". Similarly, in its <i>2020 response</i> to the EU ETS consultation, IATA opposed the application of the EU ETS to aviation, questioned its legality, rejected a reduction in free aviation emissions allowances, and supported replacing it with CORSIA. Additionally, in a private meeting with the EU Commission in April 2020, IATA <i>lobbied policymakers</i> to provide flexibility with EU ETS compliance for the aviation industry due to Covid-19. |
| Airline | Position | Evidence |
| <i>Air France-KLM</i> | Negative | In an August 2020 <i>consultation response</i> , Air France-KLM advocated for CORSIA to replace international (EU to/from non-EU) flights in the EU Emissions Trading System (EU ETS) and stated "the option of exempting intra-EU feeder flights from EU ETS to rebalance the playing field should in particular be assessed by the Commission." In the same <i>consultation response</i> , they also opposed a reduction for free emissions allowances for aviation in the EU ETS and supported the exemption of intra-EU feeder flights from the EU ETS. In a March 2021 policy paper emailed to the EU Commission, Air-France KLM appeared to <i>oppose</i> reducing free emissions allowances for aviation in the EU ETS and supported the "full and proper implementation of CORSIA". Similarly, in its 2020 <i>public policy position</i> statement, Air France-KLM argued that participation in CORSIA should exempt the sector from policies including the EU ETS. Air France-KLM further disclosed through its 2020 CDP <i>disclosure</i> that it "expects CORSIA to be the only measure applicable to emissions from international flights within Europe in the future." |
| <i>International Airlines Group (IAG)</i> | Negative | IAG's 2020 CDP response <i>disclosed</i> that it is "actively lobbying UK and EU Governments on the issue that CORSIA should replace aviation's inclusion in the EU ETS." Similarly, a 2019 presentation from IAG communicated that it is <i>lobbying</i> to repeal the EU ETS and replace it with CORSIA. |

| | | |
|------------------------------------|-----------------|---|
| <i>Lufthansa</i> | Negative | In multiple EU consultation responses in 2020, Lufthansa <i>advocated against</i> reducing free emissions allowances for aviation and opposed the inclusion of international (EEA to/from non-EEA) flights in the EU ETS with an unclear position on including intra-EU flights in the EU ETS scope. Additionally, in a January 2021 email to the Vice-President of the European Green Deal, Lufthansa <i>advocated</i> for intra-EU feeder flights (flights to hub airports from destinations not served by larger airlines) to be exempt from the EU ETS. Similarly, a 2019 policy brief from Lufthansa <i>criticized</i> the “competitive disadvantage” of the EU ETS for aviation, asserting that “a way must be found to coordinate the ETS and CORSIA optimally in order to avoid dual burdens on European airlines”. |
| <i>Ryanair</i> | Negative | In a 2021 EU consultation response, Ryanair appeared <i>unsupportive</i> of reducing free emissions allowances for aviation in the EU ETS and argued increased carbon leakage protection should be provided for “sectors most at risk”. |
| <i>easyJet</i> | Mixed | In its <i>2020 Annual Report</i> , easyJet advocates for intra-EU flights to remain in the EU Emissions Trading System (EU ETS), and that international (EU to/from non-EU) flights “should remain in CORSIA to support global efforts, but with an obligation equivalent to that of the EU ETS”. |
| <i>Virgin Atlantic</i> | Undisclosed | N/A |
| <i>Scandinavian Airlines (SAS)</i> | Undisclosed | N/A |
| <i>TAP Air Portugal</i> | Undisclosed | N/A |
| <i>Norwegian Air Shuttle ASA</i> | Undisclosed | N/A |
| <i>Wizz Air</i> | Undisclosed | N/A |
| Aircraft Manufacturer | Position | Evidence |
| <i>Airbus</i> | Undisclosed | N/A |
| <i>Boeing</i> | Undisclosed | N/A |

| Kerosene jet fuel taxation | | |
|---|----------|---|
| Industry Association | Position | Evidence |
| <i>Airlines for Europe (A4E)</i> | Negative | A4E stated vocal <i>opposition</i> to a jet fuel tax for aviation in a 2020 EU consultation, further <i>arguing</i> in an October 2020 policy paper that a fuel tax would “reduce the global competitiveness of European airlines”. Additionally, in a March 2020 press release, A4E <i>advocated</i> for a moratorium on new aviation taxation during the Covid-19 crisis. A4E’s Managing Director, Thomas Reynaert also <i>argued</i> in a February 2020 media piece that “not one single study” shows that ticket or fuel taxes impact passenger behavior enough to “very much decrease” aircraft traffic. |
| <i>International Air Transport Association (IATA)</i> | Negative | In a 2020 EU consultation, IATA <i>opposed</i> the introduction of an EU jet fuel tax to help decarbonize aviation. |
| Airline | Position | Evidence |
| <i>Air France-KLM</i> | Negative | Air France-KLM appeared to oppose an EU jet fuel tax in an April 2020 EU <i>consultation response</i> , stating that “measures that merely add costs and do not help us in this green transition such as additional national or European fuel, CO2 or ticket taxes must be avoided”. Furthermore, a policy paper emailed by Air France-KLM to the EU Commission in March 2021 <i>opposed</i> ending the fuel tax exemption for aviation in the EU. |

| | | |
|---|-----------------|---|
| <i>International Airlines Group (IAG)</i> | Negative | A 2019 <i>media report</i> from the Wall Street Journal stated that International Airlines Group reportedly opposed an EU-wide jet fuel tax. |
| <i>Lufthansa</i> | Negative | Lufthansa's "key messages on climate policy" website statement in 2021 appears to <i>oppose</i> a national jet fuel tax, arguing it would distort competition. Lufthansa also <i>opposed</i> a potential German tax on jet fuel in a 2019 policy brief, stating that it would weaken Germany's position as an aviation hub without gaining any significant environmental benefit. A 2019 <i>media report</i> from the Wall Street Journal stated that Lufthansa reportedly opposed an EU-wide jet fuel tax. |
| <i>Ryanair</i> | Negative | In a 2020 EU consultation response, Ryanair <i>stated</i> "taxing kerosene and other aviation fuels for intra EU flights would be counterproductive because of the risk of "tankering"", suggesting opposition to an EU jet fuel tax. A 2019 <i>report</i> from the Irish Times stated that Ryanair reportedly opposed an EU-wide jet fuel tax, with Ryanair asserting that any such tax would be "very damaging for Ireland". In 2019, Ryanair CEO, Michael O'Leary, further <i>argued</i> that "fuel taxes damage EU competitiveness and distort traffic flows" in a press conference. Similarly, in 2019 O'Leary reportedly stated <i>opposition</i> to "a bunch of f**king Dutch people telling us to pay more taxes" before a meeting with the EU Transport Commissioner that included taxation discussions. While Ryanair's chief marketing officer in 2019 <i>appeared to support</i> a tax on jet fuel over the EU ETS in an interview, a Ryanair statement clarified that "it favors no new taxes at all". |
| <i>easyJet</i> | Mixed | Evidence included in private letters from easyJet to the EU Commission suggest potential support for a jet fuel tax, <i>stating</i> in November 2019 that "if a tax is needed, it must be directly linked to CO ₂ – i.e. a fuel tax", In February 2020, an easyJet <i>private email</i> to the EU Commission stated that "I would like to share thoughts with you on [...] ensuring that European aviation reaches its environmental objectives for 2050 - including how this could involve taxation, in particular a fuel tax on kerosene". However, <i>meeting notes</i> from December 2019 between easyJet and the EU Commission suggest an unsupportive position for an EU fuel tax, with easyJet criticizing the level of taxes paid by them in Europe and the "wrong belief that aviation is exempted to tax due to no tax on kerosene". Additionally, a 2019 article from the Wall Street Journal suggested easyJet reportedly <i>opposed</i> an EU-wide tax on jet fuel. |
| <i>Virgin Atlantic</i> | Undisclosed | N/A |
| <i>Scandinavian Airlines (SAS)</i> | Undisclosed | N/A |
| <i>TAP Air Portugal</i> | Undisclosed | N/A |
| <i>Norwegian Air Shuttle ASA</i> | Undisclosed | N/A |
| <i>Wizz Air</i> | Undisclosed | N/A |
| Aircraft Manufacturer | Position | Evidence |
| <i>Airbus</i> | Undisclosed | N/A |
| <i>Boeing</i> | Undisclosed | N/A |

| National ticket taxes | | |
|----------------------------------|----------|--|
| Industry Association | Position | Evidence |
| <i>Airlines for Europe (A4E)</i> | Negative | Airlines for Europe has communicated consistent opposition to European ticket taxes for aviation. An October 2020 A4E policy paper <i>recommended</i> that governments "steer clear of |

| | | quick fixes (e.g., ticket taxes) to pressing and complex environmental challenges". In 2019, A4E further stated specific opposition to a <i>Netherlands</i> ticket tax on Twitter and in 2020 its Managing Director appeared unsupportive of the <i>UK Air Passenger Duty</i> in a November 2020 media interview. |
|---|-------------|--|
| <i>International Air Transport Association (IATA)</i> | Negative | In 2019-20, IATA communications have stated vocal opposition to ticket taxes on aviation, including in <i>Switzerland</i> and <i>France</i> . Furthermore, in 2019, IATA's former CEO, Alexandre de Juniac, specifically stated <i>opposition</i> to a German ticket tax for aviation, arguing that "taxes are not the way to cover our environmental costs". Similarly, in a 2019 ICAO working paper, IATA <i>opposed</i> the introduction of any ticket taxes in states covered by CORSIA. |
| Airline | Position | Evidence |
| <i>Air France-KLM</i> | Negative | In 2019-20, Air France-KLM opposed a ticket tax for aviation in France, according to a 2019 <i>press release</i> and a 2020 <i>Reuters article</i> , while <i>Forbes</i> in 2020 reported that Air France-KLM appeared to oppose a Dutch ticket tax for aviation. Air France-KLM further disclosed <i>opposition</i> to "jet fuel taxation, carbon taxation and/or ticket taxation" for aviation in France and the Netherlands in its 2020 CDP response. In March 2020, Air France's CEO, Benjamin Smith, also <i>argued</i> that "in view of the coronavirus outbreak, we are asking governments to suspend the introduction of new flight taxes". |
| <i>International Airlines Group (IAG)</i> | Negative | In March 2020, an IAG spokesperson <i>supported repealing</i> the UK Air Passenger Duty, a ticket tax on flights, in media communication. In evidence provided to the British parliament in September 2020, the CEO of British Airways, an IAG subsidiary, appeared to <i>advocate</i> for the UK Air Passenger Duty (APD) tax to be suspended for at least twelve months for domestic travel due to the COVID-19 pandemic. In a 2019 presentation, IAG also appeared <i>unsupportive</i> of other national European ticket taxes on flights. |
| <i>Lufthansa</i> | Negative | In 2021 website communications, Lufthansa stated <i>opposition</i> to a German air ticket tax and national jet fuel taxes. Similarly, in 2020 a Lufthansa spokesperson <i>stressed</i> competitiveness concerns to argue against increasing the German aviation tax. In 2020, Swiss Airlines (a wholly-owned subsidiary of Lufthansa) publicly <i>opposed</i> a ticket tax on Swiss flights. Lufthansa's CEO, Carsten Spohr further stated <i>opposition</i> to national-level taxes on aviation in a 2019 interview and argued that similar EU-wide measures would harm competition. |
| <i>Ryanair</i> | Negative | Ryanair's 2019 'Environmental Policy' report states <i>opposition</i> to airline ticket taxes in the Netherlands, France, and Ireland, with Ryanair also urging Portugal to <i>scrap</i> a proposed air travel eco-tax in November 2020 on Twitter. In March 2021, Ryanair's CEO, Michael O'Leary provided oral evidence to the UK Government, using the Covid-19 crisis to justify <i>advocating</i> for the UK air passenger duty tax to be repealed "for a one or two-year period", after Ryanair called for its <i>suspension</i> previously in a June 2020 media statement. In a 2019 press conference, Michael O'Leary stated <i>opposition</i> to a French ticket tax on aviation, also <i>arguing</i> in 2020 that "we would like to see the removal of rights of EU governments to use aviation as a tax grab against consumers". |
| <i>easyJet</i> | Negative | In August 2020, easyJet publicly <i>urged</i> the UK government to suspend the Air Passenger Duty (APD) tax for twelve months due to the Covid-19 crisis. This recommendation was further repeated by easyJet in a September 2020 <i>testimony</i> to the UK government, while also arguing for APD reforms to ensure flights are taxed based on their carbon emissions per journey. A media statement from easyJet in 2020 also communicated opposition to a <i>Dutch ticket tax</i> , while in 2019 easyJet's CEO, Johan Lundgren, <i>criticized</i> the Danish ticket tax on flights in a private meeting with the UK Transport Secretary. In a 2019 private letter to the EU Commission, easyJet stated <i>support</i> for ticket tax reforms to better ensure taxes are linked to their carbon emissions and supported ending exemptions for transfer passengers, private aviation, and cargo flights under such taxes. |
| <i>Virgin Atlantic</i> | Undisclosed | N/A |

| | | |
|-----------------------------|-------------|--|
| Scandinavian Airlines (SAS) | Negative | SAS communicated <i>opposition</i> to ticket taxes for aviation in Sweden and Norway in its 2020 Sustainability Report. |
| TAP Air Portugal | Undisclosed | N/A |
| Norwegian Air Shuttle ASA | Negative | Norwegian stated <i>support</i> for the temporary repeal of the Norwegian ticket tax for aviation in response to the pandemic in a March 2020 press release. |
| Wizz Air | Undisclosed | N/A |
| Aircraft Manufacturer | Position | Evidence |
| Airbus | Undisclosed | N/A |
| Boeing | Undisclosed | N/A |

| Sustainable aviation fuels mandate | | |
|--|----------|---|
| Industry Association | Position | Evidence |
| Airlines for Europe (A4E) | Mixed | Airlines for Europe argued in a <i>2020 consultation</i> that a SAF mandate should only be considered under “mature market conditions”, suggesting an unsupportive position. Similarly, A4E’s Managing Director, Thomas Reynaert, <i>stated</i> in 2020 that regarding SAFs, “such legislation needs to prioritize additional incentives for aviation, instead of putting in place compulsory mandates for blending irrespective of price, production volumes or competitiveness considerations”. However, in November 2020, as part of the Aviation Round Table report, A4E appeared to <i>endorse</i> an EU SAF blending mandate. |
| International Air Transport Association (IATA) | Mixed | IATA also appeared <i>unsupportive</i> of an EU blending mandate for Sustainable Aviation Fuels (SAFs) in a 2020 EU consultation response, emphasizing cost concerns. Furthermore, in a February 2020 <i>meeting</i> with EU DG Transport officials, IATA stressed that blending mandates may affect EU airline competitiveness. However, in March 2021 comments in Euractiv, IATA appeared to take a more mixed position, <i>supporting</i> an EU SAF mandate “to intra-EU flights only in the first phase, with a potential to be extended in a second phase”. |
| Airline | Position | Evidence |
| Air France-KLM | Mixed | In an October 2020 response to the RefuelEU consultation, Air France-KLM took an <i>unclear position</i> on an EU SAF mandate. In March 2021, Air-France KLM appeared unsupportive of an EU SAF mandate in a policy paper sent to EU Commission officials, <i>arguing</i> it should only be introduced in a “mature market” and “should not be imposed if high-quality SAF is still too scarce in Europe”. |
| International Airlines Group (IAG) | Mixed | In its 2019 Annual Report, International Airlines Group <i>disclosed</i> that they are “lobbying to prevent mandates [...] at an EU and UK level” on sustainable aviation fuels (SAFs), arguing they should only apply at a global level. In its April 2020 <i>response</i> to the RefuelEU consultation, IAG stressed that an EU-wide blending SAF mandate would cause competitive distortion, urging policymakers to only include intra-EU (EU to/from EU states) flights in a potential mandate. However, IAG in October 2020 appeared to <i>endorse</i> an EU-wide SAF blending mandate through its endorsement of a Clean Skies for Tomorrow initiative strategy on European aviation. |
| Lufthansa | Negative | In March 2020 Lufthansa’s CEO argued that European regulations on SAFs should not “push us into <i>mandated</i> fuels unless it is done worldwide, otherwise it decreases the competitiveness of European airlines”. Similarly, in an October RefuelEU consultation response, Lufthansa <i>stated</i> regarding SAFs that “instead of a mandate, a feed-in tariff could help to differentiate between technologies and level the costs”. However, in October 2020, as part of the Clean Skies for Tomorrow initiative, Lufthansa appeared to <i>endorse</i> an EU SAF blending mandate. Yet in private emails to EU Commission officials in <i>January</i> and <i>February</i> |

| | | 2021, Lufthansa appeared unsupportive of a SAF mandate, emphasizing “competitiveness issues”. |
|-----------------------------|-------------|--|
| Ryanair | Mixed | In a March 2020 EU consultation response, Ryanair <i>emphasized</i> cost and competitiveness concerns to “strongly advise against introducing mandates on Sustainable Aviation Fuels (SAFs) in the nearest future.” In an October 2020 EU consultation response, Ryanair <i>stressed</i> cost concerns around a SAF mandate while arguing it should apply to international (non-EU to/from EU) flights alongside intra-EU flights. Similarly, in March 2021, Ryanair signed a joint letter to policymakers that <i>opposed</i> excluding long-haul flights from an EU SAF mandate. |
| easyJet | Mixed | In a 2020 response to the EU Refuel consultation, easyJet stated support for an EU Sustainable Aviation Fuels (SAFs) mandate with the exception that it only applies to only long-haul flights over 1500km. Similarly, in March 2021 easyJet signed a joint letter to policymakers that <i>opposed</i> the exclusion of long-haul flights in a potential EU SAF mandate. |
| Virgin Atlantic | Undisclosed | N/A |
| Scandinavian Airlines (SAS) | Undisclosed | N/A |
| TAP Air Portugal | Undisclosed | N/A |
| Norwegian Air Shuttle ASA | Undisclosed | Norwegian <i>references</i> SAF mandates in their “Sustainability Strategy 2020-23” report without taking a clear position on such mandates. |
| Wizz Air | Mixed | In March 2021, Wizz Air signed a <i>joint letter</i> opposing the exclusion of long-haul flights in a potential EU sustainable aviation fuels mandate. |
| Aircraft Manufacturer | Position | Evidence |
| Airbus | Mixed | In 2020, as part of the <i>Clean Skies for Tomorrow initiative</i> , Airbus appeared to endorse an EU sustainable aviation fuel (SAF) blending mandate alongside other measures to increase European SAF supply and demand. However, in a 2020 EU consultation response to the Refuel EU initiative on sustainable aviation fuels, Airbus appeared to take an <i>unclear position</i> regarding an EU SAF mandate. |
| Boeing | Mixed | Boeing appeared to <i>oppose</i> an EU mandate for sustainable aviation fuels (SAFs) in an April 2020 consultation response, citing competitiveness concerns. Similarly, in an October 2020 RefuelEU consultation response, Boeing <i>stated</i> “we caution against imposing a minimum share of sustainable fuel in the form of mandates”, arguing that “without mechanisms to advance production and R&D, a blending mandate is premature”. However, Boeing in October 2020, as part of the Clean Skies for Tomorrow initiative, appeared to <i>endorse</i> an EU SAF mandate. |

Appendix 4: Disclosed Aviation Lobbying Spend in Europe

| Industry association | Declared lobbying spend in Europe ⁴ | Financial year |
|---|--|-------------------|
| <i>Airlines for Europe (A4E)</i> | €950,000 | 01/2020 - 12/2020 |
| <i>International Air Transport Association (IATA)</i> | €950,000 | 01/2018 - 12/2018 |
| Airline | | |
| <i>Air France-KLM</i> | €950,000 | 01/2020 - 12/2020 |
| <i>International Airlines Group (IAG)</i> | €250,000 | 01/2019 - 12/2019 |
| <i>Lufthansa</i> | €350,000 | 01/2019 - 12/2019 |
| <i>Ryanair</i> | €250,000 | 04/2019 - 03/2020 |
| <i>easyJet</i> | €150,000 | 10/2019 - 09/2020 |
| <i>Virgin Atlantic</i> | N/A | N/A |
| <i>Scandinavian Airlines (SAS)</i> | N/A | N/A |
| <i>TAP Air Portugal</i> | €0 | 01/2020 - 12/2020 |
| <i>Norwegian Air Shuttle ASA</i> | N/A | N/A |
| <i>Wizz Air</i> | €0 | 04/2019 - 03/2020 |
| Aircraft Manufacturer | | |
| <i>Airbus</i> | €1,875,000 | 01/2019 - 12/2019 |
| <i>Boeing</i> | €550,000 | 01/2019 - 12/2019 |
| Total combined lobbying spend | €6,275,000 | |

⁴ Data taken from the [EU Transparency Register](#). Data used is an average of estimated disclosed figures (e.g., €950,000 when disclosed estimate is €900,000 - €999,999) and €0 if costs of < €9,999 are disclosed.