



# AEF response to consultation on a Flight Emissions Label

**October 2024**

There is demand for the provision of environmental information to consumers and the public regarding the impact of flying. This is a timely opportunity to consider how a Flight Emissions Label can contribute to the public's understanding, and in doing so, raise awareness of the sector's greenhouse gas emissions, and support consumer choice and behaviour change.

Providing information that is clear and can be trusted will be key to success. Information should also be available prior to completion of a booking regardless of the booking method used by the customer. Based on these objectives, AEF believes that the proposal for a Flight Emissions Label could be significantly improved by addressing the following issues in the proposed methodology and application:

- 1. Introduce a mandatory requirement for aircraft operators to use the Flight Emission Label.** It is likely that a voluntary approach may not be adopted universally by airlines, especially if an airline believes that the label would not present its operations in a favourable position compared to those of its competitors. This would prevent consumers from making comparisons and informing consumer choice. It also risks that non-users of the label could introduce, or continuing to use, their own environmental information which could create public confusion if different approaches and methodologies are adopted. This outcome would undermine the purpose and value of having a standardised European label.
- 2. Ensure all design parameters promote the highest level of accuracy.** We place the highest priority on the information provided being accountable and accurate. This is currently not the case with the proposal to use a definition of 100kg as the weight of a passenger in the equal mass approach. For the reasons highlighted by the International Council for Clean Transportation (ICCT) in its response to this consultation, this approach to calculating the flight emissions label would hide 9% of the long-haul passenger emissions from consumers. Instead, we strongly recommend the addition of a 50kg per seat furnishings correction factor when apportioning emissions between passengers and belly cargo. Adopting the approach

of adding a furnishings correction factor would also promote international standardisation as it aligns with the methodology adopted by ICAO in its Carbon Emissions Calculator (ICEC) and users of the Travel Impact Model developed by ICAO.

3. **Ensure the public has comprehensive information by including non-CO2 impacts.** In addition to including a CO<sub>2e</sub> requirement to cover the Kyoto gases, we support a minimum requirement to provide additional information on how non-CO<sub>2</sub> impacts contribute to net warming. Using scientific uncertainty as a reason to ignore non-CO<sub>2</sub> impacts would be more misleading than including them with the appropriate caveats. Information could be as simple as a text box informing consumers about the net warming from non-CO<sub>2</sub> impacts, their scale, and why altitude and time of day matter to contrail formation, through to making calculations (for example, using flight-specific non-CO<sub>2</sub> factors, or average non-CO<sub>2</sub> factors for long, medium, short and domestic flights). Improving public awareness of non-CO<sub>2</sub> emissions is important and could have significant benefits for creating public acceptance of policy goals and measures in the future. It could also inform consumer choice (for example, whether to avoid flights predominantly during hours of darkness if there is a likely risk of contrail formation).
  4. **Information should be relevant to the public and support choice** For example, to ensure that information is useful to consumers, we would like to see the label provide links to additional information relating to a) the impact of distance b) alternatives such as videoconferencing or travelling by rail, and c) guidance on how emissions vary by the choice of seating class.
  5. **The information should be presented in a clear way that avoids misleading consumers.** We oppose the use of any presentational tool for the label that implies some flights are a 'green' choice.
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