

Ensuring a harmonized measurement and reporting framework for GHG emissions from business travel

GBTA's position on [CountEmissions EU](#)

The [Global Business Travel Association](#) (GBTA) strongly supports the creation of an EU framework for harmonised measurement of emissions from all modes of transport – including rail, road and air – in order to increase transparency and help promote the uptake of low-carbon business travel.

Business travel brings people together and promotes economic growth within and across national borders. The climate emergency has led our industry to rethink the way people travel for business and place climate action at the forefront of corporate travel management programmes, to allow for effective reductions in greenhouse gas emissions (GHG) generated by business trips.

The lack of emissions data is a key barrier to climate action

GBTA has been championing these efforts for the business travel community – including both users and suppliers of corporate travel – to demonstrate the important contribution the business travel sector can make to climate action and corporate responsibility.

Earlier this year, GBTA published a landmark [study on the State of Sustainability for Global Business Travel](#), which showed that **almost two-thirds (63%) of the industry identifies the lack of transparent sustainability data as a main barrier to climate action.**

'Not having industry standards holds the industry back short-term due to a lack of data. If you don't know what your emissions are, how can you put in a plan to reduce them.', Industry Respondent, GBTA Sustainability Study, April 2022

We agree with some of the **problems drivers** outlined by the European Commission, namely:

- There is currently **no common methodology** and default values for GHG calculations
- There is a perceived **complexity and high costs** of GHG emissions tracking and reporting

We would however like to flag, from a business travel perspective, that:

- The **demand for GHG emissions data is strong** from users of business travel services. As business leaders commit to their own net zero strategies, corporate travel managers are being asked to track and reduce emissions from business travel.
- The perceived **reluctance to reveal commercially sensitive data** should be expected to lessen as ESG reporting requirements become more codified, providing a level playing field for the industry.

Corporate travel managers currently rely on various calculation methods

Right now, our members who already took steps to calculate emissions from their business travel programmes are often relying on [GHG scope 3.6 protocol standards](#) to calculate their emissions from business travel, identified as 'emissions from the transportation of employees for business-related activities in vehicles owned or operated by third parties, such as aircraft, trains, buses, and passenger cars.'

The 3 main calculation methods include:

1. **Spend-based method**, which involves determining the amount of money spent on each mode of business travel transport and applying secondary (EEIO) emission factors;
2. **Distance-based method**, which involves determining the distance and mode of business trips, then applying the appropriate emission factor for the mode used;
3. **Fuel-based method**, to determine the amount of fuel consumed during business travel (i.e., scope 1 and scope 2 emissions of transport providers) and applying the appropriate emission factor for that fuel.

The use of default emission factors by e.g., [Defra](#), [EPA](#), [IPCC](#), or [ICAO](#) aims to balance issues such as the lack of accurate data on specific journeys or a limited administrative capacity to provide and consider every additional effect that contributes to the carbon footprint of travel.

Common standards and incentives are needed to drive change at scale

Global intervention is critical to help harmonize standards and promote transparency in calculating, tracking and disclosing emissions data. **These conclusions are supported by the perception of our members, as identified in our study, that the two most effective ways to help the sector accelerate its sustainability journey are achieving a culture change within the industry and ensuring better data tracking.**

GBTA has been playing its part in terms of sharing best practices and supporting industry learning, including via the release of our [GBTA sustainability toolkit](#) for members, which include dedicated modules and guidelines on sustainability data, emissions tracking and reporting. We believe this effort is complementary to far-reaching, ambitious government-led action to standardize the ways emissions from various travel modes are being calculated and reported.

Establishing a level playing field for GHG emissions accounting in transport and logistics sectors will incentivize the reduction of emissions from transport and logistics and facilitate behavioural change.

To ensure this legislation is future proof, GBTA is looking forward to collaborating with EU policymakers and would like to share the following recommendations:



1. Ensuring the availability of accurate and comparable data for each trip

Currently, one of the main concerns for travel managers seeking to monitor emissions from the business trips of their employees is the availability and reliability of data. Being able to access this data is the first step of any credible climate action plan and **supports both employee/traveler engagement to select greener options and supplier engagement to support green procurement.**

As there is no harmonized international standard for calculating transportation emissions, the business travel industry must rely on different methodologies that provide proxy or emission factor calculations,

using data collected from a variety of sources, such as travel management companies, suppliers, offset partners and consultants. However, to help travelers make more informed choices, it is crucial that emissions are measured using a clear and harmonized methodology – **at service level, i.e., for each individual trip taken by a traveler.**

2. Providing a usable, affordable common framework for emissions calculations

The chosen methodology should make available reliable, consistent and comparable **information on the GHG emission intensity of individual transport services.** It should include a clear verification regime and implementation specifications providing detailed guidance on how to apply the harmonised methodology in specific sectors.

As a company embarks on its sustainability journey and commits to reducing its transport emissions, it is essential to be able to benchmark progress against the targets it has set out. This can be facilitated by establishing a baseline at the beginning of the emissions reduction effort against which future efforts can be compared. A harmonised methodology used by travel managers to calculate emissions would facilitate the setting of such a baseline.

It is also critical to ensure that **such harmonized framework does not become an excessive burden – either administrative or financial** – for either users or providers of business travel services.

To this end, GBTA believes that:

- **Sector specific associations** and bodies have a key role to play in developing sector specific guidelines for the calculation of emissions, in collaboration with independent experts and NGOs
- **Standardization bodies like ISO** should be responsible for adopting, ratifying and maintaining these sector specific guidelines

3. Mandating the use of the harmonized framework for measurement and reporting

Making the CountEmissionsEU provisions voluntary in nature would not bring about the necessary harmonization needed in terms of calculation and reporting standards of transport-related emissions.

Mandatory provisions – as long as they are balanced and provide for a feasible transition period in their implementation – would be the way to move the needle in a meaningful way and deliver on the expectations of travel managers.

This is why GBTA believes that **using the harmonised method both for calculating and reporting transport emissions should be mandatory** – with necessary adjustments for Small and Medium Enterprises, and with the European Commission providing the basic tools for supporting the new requirements, to make sure there is no barrier to entry.

The entity responsible for providing the emissions data on which the calculations will be based should be the transportation service providers. These service providers have the most accurate numbers and data on the emissions associated with the trips they undertake.

Down the line, GBTA believes that disclosing emissions data should also become a mandatory provision for all organizations, based on the appropriate regulatory vehicle, such as the Corporate Sustainability Reporting Directive (CSRD).

4. Covering both pre-travel (ex-ante) and post-travel (ex-post) emissions data

Pre-trip emissions data displayed at the point of sale is critical to the shift to sustainable business travel models, as it provides clear information on the most environmentally friendly travel modes and thus enables travel managers to choose the most sustainable travel options.

At the same time, **post-trip emissions data reporting** is key to the ongoing reduction of greenhouse gas emissions by providing an accurate picture of the actual emissions associated with the trip.

Based on the above reasoning, GBTA believes measurement frameworks should be harmonized for both pre-trip estimates and post-trip data on emissions associated with the trip. They are both necessary and fit different purposes: pre-travel estimates being used to nudge travelers towards greener options and post-travel actual data being used for reporting purposes.

We however recognize the **challenges related to this ask**, as this would require travel service providers to feed pre-trip emissions data to all Travel Management Companies (TMCs) and Online Booking Tools (OBTs). With this in mind, GBTA would like to flag that the **European Commission's priority should remain on the post-trip reporting to make sure there is an alignment and the highest level of accuracy possible.**

5. Working towards global uptake of this EU-led standard

GBTA believes that the calculation tool should be based on a common methodology that is **widely used and globally applicable and that reflects an unbiased, net-based calculation**. This would avoid patchwork of regional measurements and ensure that standardisation meets the objectives of the business travel industry and is internationally recognised. It is important that the legislation ensures that transport operators publish usable data so that customers can make sustainable choices.

In addition, promoting the use of a widely used international standard could **encourage other regions of the world to follow the EU's lead** and adopt a similar instrument, thereby further reducing emissions from the transport sector.

About the Global Business Travel Association

The Global Business Travel Association (GBTA) is the leading business travel and meetings trade organization with operations on six continents. GBTA's 7,000-plus members manage more than \$345 billion of global business travel and meetings expenditures annually. GBTA delivers world-class education, events, research, advocacy, and media to a growing global network of more than 28,000 travel professionals and 125,000 active contacts. To learn how business travel drives lasting business growth, visit www.gbta.org.